Inspector's Report

ABP-321278-24

Development	Railway (Luas Finglas - Broombridge to Charlestown) Order [2024]
Location	3.9km in length running from the existing Green Line terminus at Broombridge to a new terminus at Charlestown, Dublin.
Planning Authority	Dublin City Council/ Fingal County Council
Applicant(s)	Transport Infrastructure Ireland
Type of Application	Railway Order Application
Prescribed Bodies	A. Commission for Railway Regulation B. Coras Iompair Éireann (CIE) C. Department of Housing, Local Government and Heritage D. Dublin City Council E. Fingal County Council F. National Transport Authority G. Uisce Éireann

Observers/ Objectors

1. Adrez Ltd.
2. Aldi Stores (Ireland) Ltd.
3. An Post
4. Appian Holdings Ltd. (Mongey Plunkett Motors)
5. Atlas Autoservice
6. Brooks Timber & Building Supplies Ltd.
7. Cllr. Mary Callaghan
8. Colorman (Ireland) Ltd.
9. Dessie Ellis TD
10. Downshire Propco Ltd. (Brookes Timber & Building Supplies)
11. Dublin Commuter Coalition
12. Fashionflo Ltd.
13. Finglas Counselling Services Board of Management
14. Finglas Youth Resource Centre CLG
15. Firehorn Ltd. (Manhattan Peanuts Ltd)
16. Heetland Ltd. (Jamestown Business Park)
17. HPC Sales (TJ O'Mahoney Builders Providers)
18. Jack & Lily O'Neill
19. Jennifer Caul & Jason Neeson
20. Joe Duffy Motor Group
21. John Duffy
22. Lidl (Ireland) GmbH

23. Mary Davitt
24. Megan Coughlan
25. Megrick Ltd.
26. Mellow Spring Childcare Development Centre
27. Michael Coughlan
28. Michael Liam Coughlan
29. Murdocks Builders Suppliers
30. Niamh Mooney & Darren Hanlon
31. Paul McAuliffe TD
32. Rory Hearne TD
33. Susan Coughlan
34. Tempside Ltd (Polonez Finglas)
35. The National Graves Association
36. Sport Ireland/ Connolly Hospital Blanchardstown/ TUD Blanchardstown
37. Tricia Everitt & Tony Jones
38. Turlough Hamill & Michael Cosgrove (Square Fit Ltd. & Alliance Automotive)
39. Voice of Vision Impairment

Date of Site Inspection	15th April 2024
Inspector	Donal Donnelly

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1.0 Introduction

1.1. This report relates to an application by Transport Infrastructure Ireland (TII) for a Railway Order (RO) for the Finglas - Broombridge to Charlestown Luas project made pursuant to the provisions of Section 37 of the Transport (Railway Infrastructure) Act 2001 (as amended and substituted).

1.2. It is proposed to compulsorily acquire certain lands on a permanent or temporary basis in order to implement the proposed development. As required by section 37(3) of the Act, the application is accompanied by a draft Railway Order, a plan of the proposed works and a Book of Reference.

2.0 Project Background

2.1. The applicant made a request to enter into pre-application consultation under section 47B of the Transport (Railway Infrastructure) Act 2001, as amended, on 1st March 2023 (ABP-315939-23). Pre-Application Consultation meetings took place between An Bord Pleanála (the Board) and the prospective applicant on 26th May 2023 and 15th March 2024.

2.2. Following closure of pre-application consultations on 11th April 2024, TII submitted an application to the Board for approval of the Railway Order on 18th November 2024. The following application documents were submitted to the Board:

(a) A draft of the proposed Railway Order, entitled “Railway (Luas Finglas – Broombridge to Charlestown) Order [2024]”;

(b) A plan of the proposed railway works;

(c) A book of reference to the plan of the proposed railway works (indicating the identity of the owners and of the occupiers of the lands described in the plan);

(d) An Environmental Impact Assessment Report assessing the likely significant effects on the environment of the proposed railway works; and

(e) An Appropriate Assessment Screening Report and Natura Impact Statement.

3.0 Site Location and Description

3.1. The Electoral Divisions that the proposed route passes through are Cabra West A & B, Finglas South A, B & C, Finglas North B & C and Dubber to the north of Dublin City. The proposed extension to the Luas Green Line will continue from the existing terminus at Broombridge over through the north or Dublin city to a new terminus at Charlestown.

3.2. As the proposed scheme travels northwards from Broombridge, it crosses the Royal Canal and then continues along Broombridge Road before crossing the River Tolka in Tolka Valley Park. The route then continues upgradient along a green strip at St. Helena's and then along the eastern side of Farnham grass pitches. More linear green spaces are utilised alongside Casement Road, Patrickswell Place and Cardiffcastle Road before the alignment passes through a new corridor created within the Finglas Garda Station car park and then onto the Mellowes Road. The route then travels along the eastern side of Mellows Park, across Finglas Road and finally along St. Margaret's Road to Charlestown.

3.3. Corrine mapping illustrates land uses along the corridor from south to north as comprising industrial and commercial units, green urban areas, discontinuous urban areas, and back to industrial and commercial units. At the southern end, the line will pass through the existing Dublin Industrial Estate which now forms part of the Draft Ballyboggan Masterplan lands.

3.4. The route then passes through St Helena's in south Finglas, an area dominated by two-storey social housing developments largely built in the 1970s; then on to Finglas Village; to St Margaret's Road, which will serve the new Jamestown Masterplan lands, before terminating close to the M50 at Charlestown, an area dominated by a shopping centre and high-density apartment schemes built over the past 20 years.

4.0 Proposed Development

4.1. The proposed scheme comprises a 3.9km extension of the Luas Green Line northwards from its current terminus at Broombridge to a new proposed terminus at Charlestown. The proposed scheme commences at the existing Luas stabling area to the south of the current Broombridge stop, where an additional four new track

lines will be installed to accommodate an increase in Light Rail Vehicle (LRV) storage. The layout of the existing bus interchange at Broombridge Luas stop will be modified to facilitate easier interchange and improved pedestrian flow.

4.2. The proposed Luas extension will then pass over the Maynooth railway line and the Royal Canal on a new bridge structure located alongside the existing Broome Bridge (Royal Canal) (RPS 909). The existing pedestrian access ramp to the inbound rail platform at this location will be removed. The new Luas bridge ramp will extend down to surface level, where the tracks will continue along the eastern side of Broombridge Road before entering Tolka Valley Park and over the Tolka River via another new bridge structure (65m). A two way cycle track is also proposed along the western side of Broombridge Road and the cycle track will continue onto the bridge structure.

4.3. The tracks will then continue across Tolka Valley Road and upgradient through St. Helena's Park. New footpaths and cycle lanes are proposed parallel to the tracks as well as landscaping and the provision of public amenity space at St Helena's Stop. Reconfigured bus stop arrangements, traffic calming and improved pedestrian crossing facilities are proposed along St. Helena's Road.

4.4. Pitches in Farnham Park will be relocated to allow the Luas tracks to proceed along the eastern side. A footpath will be provided adjacent to the alignment where the tracks continue through the green space opposite Casement Road. Farnham Drive will be reduced in width and traffic-calmed for pedestrian safety and to facilitate a proposed future cycle lane under the NTA Cycle Strategy. A new signal controlled junction is proposed at Wellmount Road and Patrickwell Place.

4.5. The alignment proceeds parallel to Cardiff Castle Road and west of Raven's Court before passing through the Garda station car park. The Finglas Village stop will be located on Mellowes Road in front of the Finglas Youth Resource and Sport Centre and adjacent to the fire station. Protected cycle lanes are proposed on Mellowes Road and a cycle storage area will be situated at the tram stop. A bus stop will be provided adjacent the tram stop.

4.6. The tracks will pass along the eastern side of Mellows Park where footpaths will be realigned. At the northern end of Mellows Park, the footbridge over Finglas Road will

be removed and a be protected junction will be installed with at grade crossing facilities for pedestrians and cyclists.

4.7. The St. Margaret's stop will be situated at the southern end of St. Margaret's Road to provide easy access to bus services and with the newly proposed park and ride on North Road. McKee Avenue junction on St. Margaret's Road will be reconfigured and a new access off McKee Avenue will be constructed to access properties that will no longer have access off St. Margaret's Road. This is due to the installation of the Luas tracks on the eastern side of St. Margaret's Road.

4.8. At the termination of the line at Charlestown stop, there will be major reconfiguration of the Charlestown Place / Melville Road junction in order to provide better pedestrian and cycling crossing facilities. A tram crossover is located just before the terminus stop to facilitate trams entering or leaving either of two proposed platforms.

4.9. When completed, the journey time from Charlestown to College Green will be approximately 30 minutes.

5.0 Policy Context

5.1. Sustainable and Smart Mobility Strategy 2020 (EU Commission 2020)

5.1.1. The Smart and Mobility Strategy is part of the EU Green Deal which aims to reduce transport emissions by 90% until 2050. The Commission intends to adopt a comprehensive strategy to meet this target, and to 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.

5.2. Climate Action Plan 2025

5.2.1. The Climate Action Plan (CAP25) sets out a roadmap to halve emissions by 2030 and reach net zero by no later than 2050. CAP25 maintains continuity and builds upon CAP24, refining and updating the measures and actions required to deliver

carbon budgets and sectoral emissions ceilings. CAP25 provides a roadmap for taking decisive action to halve Ireland's emissions by 2030 and achieve climate neutrality by no later than 2050, as committed to in the Climate Action and Low Carbon Development (Amendment) Act 2021.

5.2.2. CAP25 is to be read in conjunction with CAP24 by taking account of key developments in the policy and evidence base in the previous year, while setting out a range of new actions in response to the latest data. This is intended to facilitate a focus on the delivery of outstanding actions from CAP24 and high-impact legacy actions from CAP23.

5.2.3. Over the past year, the greatest reductions in emissions have been from the energy sector, with electricity emissions down 17% in the first half of 2024. Agricultural emissions have reduced by 4% in the past year and the emissions in the built environment have reduced by 21% since 2018. It is noteworthy, however, that transport remains one of the biggest challenges, with emissions increasing by 0.3% in 2023. Notwithstanding this, there are over a million passenger journeys a day on public transport, and over 100,000 rural transport passenger journeys every week, up five-fold on passenger numbers in 2022.

5.2.4. For transport, CAP23 reframed the previous pathway outlined in CAP21 under the Avoid-Shift-Improve Framework to achieve a net zero decarbonisation pathway. This hierarchical framework has been applied again in CAP24 to prioritises actions to reduce or **avoid** the need to travel; **shift** to more environmentally friendly modes; and **improve** the energy efficiency of vehicle technology.

5.2.5. Actions and updates for 'Avoid' and 'Shift' measures and initiatives are set out in CAP25 on the national demand management strategy – 'Moving Together'; the Sustainable Mobility Policy Action Plan, 2026-2030; the role of local authorities in transport decarbonisation; shared mobility; and Connecting Ireland Rural Mobility Plan. It is recognised that the revision of the National Planning Framework will present the opportunity for enhanced spatial and land use planning. Compact growth Transport Orientated Development, improved 'Active Travel' infrastructure, better public realm and planning consents for alternative fuel, and EV charging infrastructure are highlighted in this regard. 'Improve Measures' include Zero

Emissions Vehicles Ireland (ZEVI) programme initiatives; Renewable Transport Fuel Policy 2025-2027; and National Policy Framework for Alternative Fuel Infrastructure.

5.2.6. There is no change in the key targets set out in CAP24 of 20% reduction in total vehicle kilometres travelled relative to business-as-usual, 50% reduction in fuel usage, and significant increases to sustainable transport trips and modal share. It is noted that fleet electrification and biofuels are expected to provide the greatest share of emissions abatement in the medium term.

5.3. Opportunities for Transport Orientated Development (TOD) in Major Urban Centres – Dublin Study, May 2023 (DHLGH and Department of Transport)

5.3.1. This report identifies opportunities for TOD in Dublin as a form of urban development that seeks to maximise the provision of housing, employment, public services and leisure space in close proximity to frequent, high quality transport services.

5.3.2. A working group identified 14 optimum locations in Dublin that are proximate to existing or planned high-capacity public transport nodes and have the potential for comprehensive development or redevelopment. Nine of the locations are for short to medium terms opportunities with a capacity for c. 60,000 residential units, and a further five locations are for medium to long term opportunities with an estimated capacity of up to 70,000 residential units. These longer term locations are at an early stage in the planning process and / or where future development will be dependent on the delivery of a major public transport project.

5.3.3. The proposed Luas extension is located adjacent to two of the medium to long term opportunity sites at Broombridge including Glasnevin and Dublin Industrial Estates (c. 52 ha), and at Jamestown and Charlestown (c. 70 ha). It is noted that there are strong levels of existing public transport services to support TOD at Broombridge, as well as planned transport provision which includes Dart+ by 2030 and Luas Finglas extension. The BusConnects Ballymun/ Finglas Core Bus Corridor and the Luas extension to Finglas will also serve the Jamestown and Charlestown lands.

5.4. National Planning Framework – First Revision, April 2025

5.4.1. The National Planning Framework (NPF) is the Government's high-level strategic plan for shaping the future growth and development up to the year 2040. The NPF

provides policies, actions and investment to deliver 10 National Strategic Outcomes and priorities of the National Development Plan. These include compact growth, enhanced regional accessibility, sustainable mobility and transition to a low carbon and climate resilient society. In terms of sustainable mobility, a progressive change in the way we travel is required by reducing car usage and increasing the number of journeys taken by sustainable modes of transport.

5.4.2. The NPF was replaced with the Revised National Planning Framework in April 2025. Key drivers of change in Ireland that were a significant focus for the revision process were population growth and the associated housing requirement; infrastructure delivery; and climate and the environment. Approximately 50,000 housing units per annum will be required by 2040 and this will be aligned with strategic planning for Transport Orientated Development (TOD).

5.4.3. Within Dublin City and the Metropolitan Area, there will be significant development on sites that can be integrated into the existing built-up area of the city, and serviced by existing or planned high capacity public transport, with a focus on large-scale brownfield and greenfield Transport Orientated Development opportunities, particularly along high-capacity rail corridors. The delivery of critical strategic infrastructure such as the expansion of the public transport network including the delivery of DART+, MetroLink, Luas expansion and BusConnects, is essential to the sustainable growth of Dublin.

5.5. National Development Plan, 2021-2030

5.5.1. 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 light rail. Luas Finglas was identified as the most advanced in terms of new light rail projects.

5.6. National Investment Framework for Transport in Ireland, 2021

5.6.1. This is the strategic framework for future investment decision making in land transport to enable the National Planning Framework and to support climate change.

The four investment priorities under the NIFTI are decarbonisation, protection and renewal, mobility of people and goods in urban areas, and enhanced regional and rural connectivity. These investment priorities are supplemented by modal and intervention hierarchies which encourage the use of active travel and public transport ahead of solutions reliant on private transport. Maintenance/ optimisation of existing assets, e.g., demand management, is preferred to extensive enhancements or outright new infrastructure.

5.7. National Sustainable Mobility Policy

5.7.1. This Policy sets out a strategic framework to 2030 for active travel and public transport journeys to help Ireland meet its climate obligations. An Action Plan for sustainable mobility to 2025 is included, which aims to provide safe, green, accessible and efficient alternatives to car journeys. Action 21 is the continued appraisal and planning for new light rail in Dublin, including the completion of : planning application documentation for Luas Finglas.

5.7.2. Safe and green mobility is supported in the Policy by:

- Continuing to protect and maintain the safety of existing walking, cycling and public transport networks and ensuring that new sustainable mobility infrastructure meets the highest safety standards.
- Developing pedestrian enhancement plans and cycle network plans to guide investment in new active travel infrastructure and retrofitting of existing infrastructure.
- Improving rail infrastructure in the five cities.
- Continuing the design and development of other light rail projects in the Greater Dublin Area and Cork, and considering the feasibility of light rail in Galway.
- Rebalancing transport movement in metropolitan areas and other urban centres away from the private car and towards active travel and public transport.
- Identifying a pathway for the implementation of suitable demand management measures at national and local level to reduce reliance on the private car.

5.8. Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities

5.8.1. The guidelines set out policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on sustainable residential development and the creation of compact settlements.

5.8.2. Key indicators of quality design and placemaking listed in the Guidelines are sustainable and efficient movement; mix and distribution of uses; green and blue infrastructure; and responsive built form.

5.8.3. In terms of mix and distribution of uses, it is stated that "in city and town centres and at high capacity public transport nodes and interchanges, development should consist of high intensity mix-use development (residential, commercial, retail, cultural and community uses) that responds in scale and intensity to the level of accessibility. At major transport interchanges, uses should be planned in accordance with the principles of Transport Orientated Development."

5.9. Eastern & Midlands Regional Spatial & Economic Strategy, 2019-2031

5.9.1. The RSES provides a spatial strategy, economic strategy, metropolitan plan, investment framework and climate action strategy to support the implementation of Project Ireland 2040 and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the Region.

5.9.2. This strategy sets out 16 Regional Strategic Outcomes aligned to the three key principles of healthy placemaking, economic opportunity and climate action. These RSOs include sustainable settlement patterns, creative places, integrated transport and land use, building climate resilience, a global city region and enhanced regional connectivity.

5.9.3. The Strategy includes the Dublin Metropolitan Area Strategic Plan (MASP), which is an integrated land use and transportation strategy that sets out guiding principles for the sustainable development of the Dublin Metropolitan Area. In terms of Integrated Transport and Land use, the aim is 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. The following Regional Policy Objectives are relevant to the proposed scheme:

- 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.

5.9.4. Connectivity is addressed in Chapter 8 of the Strategy where it is recognised that there is a need to ensure alternatives to the car in the design of streets and public spaces, with prioritisation of cycling and walking as active transport modes. Furthermore, it is stated that the success of transport planning in meeting society's needs requires close integration of transport investment and land use planning, to guide the direction of future development within the Region.

5.9.5. Transport investment priorities are set out in Section 8.4. Within the Dublin Metropolitan Area, investment in rail projects for the region will include LUAS Green Line Capacity Enhancement in advance of Metrolink and appraisal, planning and design of LUAS network expansion to Bray, Finglas, Lucan and Poolbeg.

5.9.6. The RSES also supports delivery of the strategic park and ride projects (including Finglas) subject to the outcome of appropriate environmental assessment and the outcome of the planning process.

5.10. Transport Strategy for the Greater Dublin Area 2022-2042

5.10.1. The 2022-2042 Strategy sets out a framework for investment in transport infrastructure and services for the GDA up to 2042. The Transport Strategy

recognises a wide range of challenges for transport underpinned by climate change; the Covid 19 pandemic; servicing the legacy development patterns; revitalising city and town centres; transforming the urban environment; ensuring universal access; serving rural development; improving health and equality; fostering economic development; and delivering transport schemes.

5.10.2. The overall aim of the Transport Strategy is *"to provide a sustainable, accessible and effective transport system for the Greater Dublin Area which meets the region's climate change requirements, serves the needs of urban and rural communities, and supports the regional economy."* The four objectives to deliver this aim are an enhanced natural and built environment; connected communities and better quality of life; a strong sustainable economy; and an inclusive transport system.

5.10.3. Chapters 10, 11 and 12 of the Transport Strategy address walking, accessibility and the public realm; cycling and personal mobility vehicles; and public transport respectively, and these sections relate both directly and indirectly to the proposed Luas extension.

5.10.4. Chapter 12 sets out the strategy for an overall public transport system for the region, where it is recognised that a network of multiple high-capacity lines incorporating bus and light rail is a more viable option in serving a city of the scale and density of Dublin in that a much wider population can be served directly with a high quality system. Light rail can also be delivered incrementally with extensions added to the original lines as and when demand for travel justifies them.

5.10.5. The Luas network in the Strategy is categorised into existing lines; lines to be delivered by 2042; and lines to be delivered after 2042. Proposed light rail elements of the comprehensive public transport network for Dublin to be delivered by 2042 include Luas extensions to Finglas, Lucan, Bray and Environs and Poolbeg.

5.10.6. Measure LRT3 – Luas Finglas states that *"it is intended to extend the Luas Green Line northwards to Finglas, inclusive of a potential park and ride facility at or close to its terminal stop."* An indicative number of parking spaces is set at 350, with the nearest junction being Junction 1 on the N2/ M2.

5.10.7. It is recognised in Section 12.3.13 that as services expand, the need for depot space also increases. The extension of the Green Line to Finglas therefore requires an

extension to depot facilities at Broombridge. This is reflected under Measure LTR12 – Additional Depot Facilities.

5.10.8. With respect to walking, accessibility and the public realm, it is recognised in the Transport Strategy that better urban design and placemaking will encourage more people to walk, cycle or use public transport. Specific measures are outlined to incorporate a high standard of urban design and placemaking into major public transport infrastructure schemes and walking and cycling projects, taking account of architectural heritage and biodiversity (PLAN14 and PLAN15).

5.10.9. In terms of cycling and personalised mobility vehicles, it is the intention of the NTA and the local authorities to deliver a safe, comprehensive, attractive and legible cycle network in accordance with the updated Greater Dublin Area Cycle Network, which is published alongside the Transport Strategy (Measure CYC1 – GDA Cycle Network). As the number of cyclists grows, the requirement to ensure that cyclists can travel unimpeded along their entire journey becomes critical and this needs to be reflected in how cycle infrastructure is managed. In this regard, Measure CYC2 – Cycle Infrastructure Design, seeks *"…to ensure that cycle infrastructure in the GDA provides an appropriate quality of service to all users, through the implementation of the design guidance contained in the latest version of the National Cycle Manual."*

5.10.10. It is also recognised that the availability of cycle parking at the beginning and end of a journey can greatly influence the decision to choose to cycle. The NTA will work with transport operators and local authorities to address the need for sufficient cycle parking at rail stations, transport interchange locations and mobility hubs. Under Measure CYC5 – Cycle Parking *"…it is the intention of the NTA to deliver, through the statutory planning process and liaison with relevant stakeholders, high quality cycle parking at origins and destinations, serving the full spectrum of cyclists including users of non-standard cycles."* The updated Greater Dublin Area Cycle Network is published along with the Greater Dublin Area Transport Strategy, 2022-2042.

5.10.11. Chapter 17 provides the outcomes and how the Strategy contributes to an enhanced natural and built environment (consolidated development, public realm and placemaking, reduced impacts of traffic, improved air quality and noise levels); how the Strategy leads to more connected communities and better quality of life

(enhanced community interaction, high quality public transport coverage); how the Strategy contributes to a strong and sustainable economy; and how the Strategy fosters an inclusive transport system (equality, health and access to jobs).

5.11. Cycle Design Manual, September 2023

5.11.1. The Cycle Design Manual draws on the experience of cycle infrastructure development over the past decade and international best practice to help deliver safe cycle facilities for people of all ages and abilities. The Manual is intended as a live document that will be updated to reflect emerging best practice.

5.11.2. Chapter 2 of the Manual sets out the five main requirements (safety, coherence, directness, comfort and attractiveness), that designs should fulfil to cater for existing cyclists and to attract new cyclists to the network. Key design principles include a network approach, segregation and inclusive mobility. It is advised that promoters of cycle facilities should cycle. Information is also provided on the types of cycle vehicles, cycle links, appropriate facilities and width calculations.

5.11.3. Chapter 3 of the Manual addresses cycle network planning, as well as the planning of cycling in private developments and public infrastructure projects. Designing for cycling is covered in Chapter 4, with guidance provided on the following:

- Geometric requirements (design speed, sight distance, visibility splays, horizontal and vertical alignments, surface crossfall, clearance and headroom),
- Cycle links (segregated cycle facilities, standard and stepped cycle tracks, protected cycle lanes, two-way cycle tracks, greenways and shared active travel facilities, cycle lanes, cycling in mixed traffic, contraflow cycling, parking and loading on links, bus stops, transitions, pedestrian crossings at cycle tracks),
- Priority junctions,
- Signal-controlled junctions (including protected junctions),
- Crossings,
- Roundabouts.

5.11.4. Details relating to implementation and maintenance, including public lighting and signage/ wayfinding, are provided in Chapter 5, and Chapter 6 sets out the various

design principles on cycle parking. Finally, typical layouts for cycle infrastructure are included in the appendix.

5.12. Dublin City Development Plan, 2022-2018

5.12.1. The main strategic approach of this plan is to develop a city that is low carbon, sustainable and climate resilient. Under Chapter 8: Sustainable Movement and Transport, it is highlighted that the sustainable and efficient movement of people and goods is crucial for the success and vitality of the city, along with the need to move away from private car and fossil-fuel-based mobility to reduce the negative impacts of transport and climate change.

5.12.2. It is an objective (SMTO1 – Transition to More Sustainable Travel Modes) *"to achieve and monitor a transition to more sustainable travel modes including walking, cycling and public transport over the lifetime of the development plan, in line with the city mode share targets of 26% walking/cycling/micro mobility; 57% public transport (bus/rail/Luas); and 17% private (car/van/HGV/motorcycle)."*

5.12.3. Policy SMT3 – Integrated Transport Network, seeks *"to support and promote the sustainability principles set out in National and Regional documents to ensure the creation of an integrated transport network that services the needs of communities and businesses of Dublin City and the region."*

5.12.4. Policy SMT4 – Integration of Public Transport Services and Development seeks *"to support and encourage intensification and mixed-use development along public transport corridors and to ensure the integration of high quality permeability links and public realm in tandem with the delivery of public transport services, to create attractive, liveable and high quality urban places."*

5.12.5. Table 8.1 sets out current and target mode share, with cycling expected to increase by 7% and public transport by 3% by 2028. It is stated that the impact of public transport infrastructure projects on mode share is more likely to come into fruition during the lifespan of the following plan. Key strategic transport projects have the potential for a transformative impact on travel modes over the coming years and 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.

5.12.6. In this regard, Policy SMT22 – Key Sustainable Transport Projects seeks *"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."*

5.12.7. Dublin City Council notes the importance of reducing car dominance and that encouraging walking, cycling and use of public transport as a sustainable travel mode requires improving the attractiveness of the environment and public realm within the city and urban villages. It is recognised that there are opportunities for developing public realm around the city and in the urban villages where new public transport proposals are being developed. The following policies are relevant in this regard:

> *Policy SMT12 – Pedestrians and Public Realm: To enhance the attractiveness and liveability of the city through the continued reallocation of space to pedestrians and public realm to provide a safe and comfortable street environment for pedestrians of all ages and abilities.*
>
> *Policy SMT13 – Urban Villages and the 15-Minute City: To support the role of the urban villages in contributing to the 15-minute city through improvement of connectivity in particular for active travel and facilitating the delivery of public transport infrastructure and services, and public realm enhancement.*
>
> *Policy SMT16 – Walking, Cycling and Active Travel: To prioritise the development of safe and connected walking and cycling facilities and prioritise a shift to active travel for people of all ages and abilities, in line with the city's mode share targets.*

SMT19 – Integration of Active Travel with Public Transport: To work with the relevant transport providers, agencies and stakeholders to facilitate the integration of active travel (walking/cycling etc.) with public transport, ensuring ease of access for all.

5.12.8. Also of relevance to the proposed development is Objective SMTO19 – Park and Ride Services, which seeks *"to promote 'Park and Ride' services at suitable locations in co-operation with neighbouring local authorities and to support the implementation of the NTA's Park and Ride Strategy for the Greater Dublin Area."*

5.12.9. At its southern end at Broombridge, the proposed Luas Finglas extension commences within Z10 Inner Suburban and Inner City Sustainable Mixed-Uses. The route then passes by Z6 – Employment/ Enterprise lands along Broombridge Road before entering Z9 Amenity/ Open Space Lands/ Green Network at Tolka Valley Park. To the north of Tolka Valley Park, the route goes through green space which is zoned Z1 – Sustainable Residential Neighbourhoods, and then around Farnham Crescent Park (Z9). There is a mix of Z1 and Z9 lands either side or along the route as it progresses past Casement Road, Patrickswell Place and Cardiff Castle Road. To the east of the Garda Station, the route passes through Z4 – Key Urban Villages/ Urban Villages before entering Z9 lands again at Mellows Park. On St. Margaret's Road, the route passes Z1 and Z6 lands, as well as a Z14: Strategic Development and Regeneration Area 3: Finglas Village Environs and Jamestown Lands. Finglas is also designated as a Key Urban Village in the Development Plan Core Strategy.

5.12.10. The route passes Records of Monuments and Places (RMP) as Established under Section 12 of the National Monuments (Amendment) Act 1994 at Tolka Valley Park and Finglas village.

5.13. Baile Bogáin (Ballyboggan) Draft Masterplan

5.13.1. Dublin Industrial Estate and Environs is identified as one of three statutory local plans that will be commenced over the Development Plan period. These lands are not yet zoned for residential purposes, but it is anticipated that they will, through the variation process, and will come forward for the first phase of development during the lifetime of the plan. Objective CSO1 seeks *"to prepare a feasibility study and a local statutory plan for the Z6 zoned lands at Glasnevin (Dublin Industrial Estate and*

environs) in consultation with the relevant stakeholders, including an infrastructural audit with costings and implementation strategy to enable sustainable regeneration and development."

5.13.2. Following on from Objective CSO1, the preparation of master plan for Ballyboggan commenced in January 2025. The masterplan is being developed for c. 77 hectares of land either side of the southern end of the proposed Luas extension and bounded by Ballyboggan Road to the north, Finglas Road to the north-east, the Claremont Estate and the Phoenix Park tunnel railway to the east, and Cabra to the south.

5.13.3. A non-statutory Draft Masterplan was issued for public consultation between Monday 14th April 2025 and Monday 12th May 2025 inclusive. *The vision for the area is that of a modern, mixed use urban neighbourhood with a strong residential and community focus which maintains complementary commercial uses, supports existing employment and provides the opportunity for new employment growth. The area will support a thriving local economy, which caters for the health and well-being of people at all stages of their life. The area will have excellent community facilities and will be underpinned by a high quality green and biodiverse public realm, well integrated with surrounding natural amenities and accessible to the wider city.*

5.14. Jamestown Masterplan, 2023

5.14.1. The Jamestown Masterplan was made in accordance with the requirements of Strategic Development and Regeneration Area (SDRA) 3 – Finglas Village Environs and Jamestown Lands, and was incorporated into the Dublin City Development Plan 2022-2028 by way of variation.

5.14.2. The Masterplan sets out detail to inform the sustainable and sequential regeneration and development of 43 hectares of land currently comprising Jamestown Industrial Estate. The Masterplan lands will be developed at an approximate ratio of 65% residential and 25% employment/commercial, complemented with community, education and ancillary uses. Approximately 3,500-3,800 homes will be supported by the Masterplan together with 138,000 sq.m. of employment floorspace.

5.14.3. St. Margaret's Road and McKee Avenue form the western boundary of the Masterplan lands. A sustainable mobility hub will be located to the north west of the masterplan lands proximate to the proposed Luas station on St Margaret's Road and

the new park and ride on the R135. Strategic pedestrian/cycle amenity links cross the masterplan lands will be aligned with key desire lines to the proposed Luas station and the will form an integral part of the integrated green infrastructure network.

5.15. Fingal County Development Plan, 2023-2029

5.15.1. The northern end of Finglas Luas is within the Fingal County Development Plan area. Lands to the west of the route at this location are zoned TC-Town and District Centre (Charlestown Shopping Centre) and OS-Open Space (McKelvey Celtic A.F.C.). The TC zoning objective is to "protect and enhance the special physical and social character of town and district centres and provide and/or improve urban facilities." The OS zoning objective is to "preserve and provide for open space and recreational amenities." To the east of the route, lands are zoned GE-General Employment with the objective to "provide opportunities for general enterprise and employment."

5.15.2. In terms of connectivity and movement, one of the key strategic objectives of the Development Plan is to strengthen the integration of land-use and transport planning, with a priority focus on increased provision of walking, cycling and public transport infrastructure. Alongside this, it is noted that the creation of attractive public realms and healthy placemaking will ensure that communities are connected in a sustainable and efficient way. Furthermore, easy access to and from residential developments, workplaces, schools and services and reliable commercial deliveries and servicing will be dependent on an increasingly efficient system of transport.

5.15.3. The role of transportation policy in addressing climate change is recognised in the development plan by promoting the need for a shift to more sustainable travel choices. The following policies are relevant:

> *Policy CMP1: Decarbonisation of Motorised Transport - Support the decarbonisation of motorised transport and facilitate modal shift to walking, cycling and public transport and taking account of National and Regional policy and guidance, while supporting an efficient and effective transport system.*

Objective CMO1: Transition to Sustainable Modes - Work with the NTA, TII and other transport agencies in facilitating the integrated set of transport objectives for the County as set out in this Plan, in line with National and Regional policy including the NTA's GDA Transport Strategy and any subsequent plan to encourage modal shift towards more sustainable modes of transport and patterns of commuting to reduce reliance on the private car.

5.15.4. It is noted that the integration of new housing, employment and services with high-capacity public transport corridors in conjunction with attractive walking and cycling networks and permeable links to rail and bus stations can reduce the need to travel and support the functioning of a connected and sustainable transport system. This is reflected in the following policies:

Policy CMP3: Integrated Land-Use and Transport Approach - Provide for an integrated approach to land-use and transportation aimed at minimising the demand for travel and prioritising sustainable modes of transport including walking, cycling and public transport.

Objective CMO3: Integration of Public Transport and Development - Support and facilitate high-density, mixed-use development and trip intensive uses along public transport corridors and to ensure the integration of high-quality permeability links and public realm in conjunction with the delivery of public transport services through plan frameworks to generate and reinforce sustainable patterns of compact growth and development in the County.

5.15.5. Public transport is recognised as being crucial in supporting future sustainable and economic growth, providing more efficient and reliable access to key urban centres, and enabling mode shift which in turn will help to reduce traffic congestion and harmful emissions. The following policies are set out in the Development Plan:

Policy CMP18: Public Transport - Support the provision of a high-quality public transportation system that is accessible to all to serve the needs of the County and to enable a significant shift from car-based travel to public transport.

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.

Objective CMO29: Integration of Public Transport Services and Development - Work with the NTA, TII and other relevant national transport agencies to optimise accessibility to public transport, increase catchment and maximise permeability through the creation of high-quality walking and cycling routes linking to public transport stops.

Objective CMO30: Cycling and Walking Links – Avail of the opportunities provided by any public transport infrastructure works to improve and provide new cycling and walking links, including crossings of motorways and major roads which currently represent major permeability barriers to active travel especially in South Fingal.

5.16. Natural Heritage Designations

5.16.1. The closest European sites to the proposed scheme are South Dublin Bay and River Tolka Estuary SPA (4.14km) and South Dublin Bay SAC (6.35km).

5.16.2. The Royal Canal pNHA adjoins the proposed scheme at its southern end.

5.16.3. The table below sets out all the designated sites within 10km of the proposed scheme:

Site Name	Site Code	Distance (nearest point to proposed development)
Liffey Valley pNHA	000128	
Santry Demesne pNHA	000178	
Dolphins, Dublin Docks pNHA	000201	

North Dublin Bay pNHA	000206	
South Dublin Bay pNHA	000210	
Dodder Valley pNHA	000991	
Booterstown Marsh pNHA	001205	
Royal Canal pNHA	002103	0km
Grand Canal pNHA	002104	
Feltrim Hill pNHA	001208	
Malahide Estuary pNHA	000205	
North Dublin Bay SAC	000206	7.17km east
South Dublin Bay SAC	000210	6.35km south-east
Malahide Estuary SAC	000205	9.33km north-east
North Bull Island SPA	004006	7.16km east
South Dublin Bay and River Tolka Estuary SPA	004024	4.14km east
North-West Irish Sea SPA	004236	9.67km east/ north-east
Malahide Estuary SPA	004025	9.37km north-east

6.0 Planning History

6.1. The following significant applications appear along the route Luas Finglas

An Bord Pleanála Ref: ABP-310350-21

6.2. Strategic housing development at Charlestown for 590 no. apartments, 2 no. retail/ commercial units, 4 no. office suites, a health/ medical centre, a creche and all associated site works granted permission in September 2021.

An Bord Pleanála Ref: ABP-314610-22

6.3. Ballymun/ Finglas to City Centre BusConnects Core Bus Corridor scheme approved in March 2024. This scheme interacts with Luas Finglas at Finglas Road.

Dublin City Council Reg. Ref: 3278/22 (ABP-313917-22)

6.4. Permission granted in April 2024 for demolition of the existing Aldi store on St. Margaret's Road and construction of a 2-storey commercial block incorporating a foodstore, with ancillary off-licence sales area at first floor level over under croft car parking and revised southern vehicular access off St. Margaret's Road.

An Bord Pleanála Ref: ABP-314232-22

6.5. The DART+ West Railway Order - Dublin City to Maynooth and M3 Parkway was made in July 2024. This scheme interacts with Luas Finglas at Broombridge. It appears that a site to the west of Broombridge Road will be used as a construction compound. The same site is shown as a construction compound for Luas Finglas.

Dublin City Council Reg. Ref: 4865/22 (ABP-315286-22)

6.6. Permission refused in January 2024 for demolition of warehouse / factory / office buildings and removal of vehicular entrance, and the construction of mixed use development comprising of 14 retail units, hotel, creche, office, 304 residential units, restaurant, bar, recreational areas and associated works at lands within the Broombridge Industrial Estate and Dublin Industrial Estate (Colorman).

6.7. It was considered under the reason for refusal that the proposed development would be premature pending the finalisation of the design for the Luas extension and bridge/ viaduct alignment.

Dublin City Council Part 8 Ref: 2870/15

6.8. The Royal Canal Greenway was approved in December 2015. This included Phase 4: Phibsborough Road, Dublin 7 to Ashtown, Dublin 15 comprising the construction of c. 4.3 km of cycle and pedestrian route from Phibsorough Road, Dublin 7 - Cross Guns Bridge to Ashtown, Dublin 15 along the northern towpath. The works traverse past Broome Bridge (Protected Structure) and H.S. Reilly's Bridge (Protected Structure). A toucan (pedestrian and cycle) crossing is proposed at Broombridge Road/ Broome Bridge.

6.9. Under Part 8 amending application Ref: 4513/23, permission is sought to *inter alia* to widen the existing towpath by realigning the northern bank of the canal west of Broombridge for approximately 345m, realigning by up to 1.4 metres. This is similar to Part 8 amending application Ref: 3513/21, which also sought the widening of the existing towpath west of Broombridge over a distance of approximately 345m.

Dublin City Council Reg. Ref: 2477/20

6.10. Permission granted in August 2020 at Erin's Isle GAA Club for a new GAA pitch with 6 no. 18m high floodlights and new 2.5m high boundary wall to western boundary at Farnham Drive circa 180m with 5m high safety netting and ancillary works including new kit store, generator and car parking 22 no. spaces and associated site works.

Dublin City Council Reg. Ref: 2439/21

6.11. Permission refused on a site at 1 St. Margaret's Road for the demolition of all existing buildings on site and the construction of 27 no. apartments. The first reason for refusal related to impact on residential amenities of adjacent properties by way of excessive overshadowing, undue overlooking, overbearing and potential noise and disturbance from external terraces. The second reason stated that the proposal may compromise the delivery of the Luas Finglas.

Dublin City Council Reg. Ref: 3364/23

6.12. Permission granted in January 2024 for extension to the existing food production and warehouse building at Manhattan Peanuts Ltd., McKee Avenue comprising an additional floor area of 1,913 sq.m.

Dublin City Council Reg. Ref: 4034/24

6.13. Permission sought at Cardiff's Bridge Road for removal of the existing sports pitches and construction of a 4 no. storey Primary Care Centre; provision of 3 no. astro pitches and a GAA Pitch and accompanying flood lights; 88 no. car parking spaces; 46 no. additional car parking spaces to support City of Dublin Education and Training Board Campus and sporting facilities; cycle parking; and all associated works.

7.0 Prescribed Bodies

7.1. Córas Iompair Éireann (CIÉ)

- CIÉ and Iarnród Éireann are required to maintain the operational safety and integrity of the railway network throughout the country. Compulsory purchase of railway lines is precluded by Section 130 of the Transport Act 1944.
- Any interface between CIÉ/ IÉ railway land and the proposed extension of the Luas shall be by way of agreement and not CPO.
- In similar situations, the property requirements of the acquiring authority have been regularised by way of Bridge Agreement(s).
- Subject to the foregoing, CIÉ/ IÉ support the application or the Railway Order and it is understood that there has been liaison between respective technical experts of CIÉ/ IÉ and the applicant in this regard.

7.2. Commission for Railway Regulation

- CRR acknowledges application for the Railway Order for Luas Finglas.
- CRR will engage with the applicant for approval in accordance with CRR's remit under the Railway Safety Act 2005, as amended.

7.3. Development Applications Unit, Department of Housing, Local Government and Heritage

Archaeology

- Department advises conditions of any grant of permission aligning with Sample Conditions C4 and C5 as set out in OPR Practice Note PN03: Planning Conditions (October 2022), with appropriate site specific additions/ adaptations based on the particular characteristics of this development and informed by the findings of the EIAR.

Nature Conservation

- Department notes that the proposal could result in significant effects on flora and fauna along and downstream of the extension's planned route.

- Of most concern would be any potential adverse effects on otter frequenting the section of the Royal Canal adjacent to Broombridge Station, and on the ex-situ winter season usage by light bellied brent goose of playing fields in the Farnham Drive area of Finglas.
- Also concerned that pollutants mobilised into surface water runoff from the proposed Luas extension particularly during construction could result in adverse effects on flora, fauna and habitats of the Royal Canal and the River Tolka, or associated with European Sites downstream. Measures set out in the EIAR, NIS and CEMP to avoid adverse effects should, if diligently implemented, prevent any such detrimental effects.
- Department recommends that it should be a condition of any Railway Order that all mitigation measures to avoid adverse effects on flora, fauna and important habitats shall be implemented in their entirety.

7.4. Dublin City Council, Planning & Property Development Department

National & Regional Policy Context

- Rail infrastructure is a key component for achieving the policy objectives of the National Planning Framework and will enable delivery of compact sustainable growth in Dublin City.
- Revised NSO5 – Sustainable Mobility seeks to *"deliver Transport Orientated Development at scale at suitable brownfield and greenfield locations in cities and metropolitan areas, along high capacity public transport corridors with a focus on land management, institutional and funding arrangements needed to accelerate this type of development."* Luas expansion is listed amongst the transformation investments in public transport and sustainable mobility solutions that will deliver integrated sustainable transport and enhance the competitiveness with Dublin City.
- Chapter 9 of the National Development Plan outlines five key Strategic Investment priorities to support the delivery of sustainable mobility, namely, active travel, Metrolink and light rail and the advancement of Luas capacity and

enhancement projects to better connect communities and enable transport-led development.

- CAP24 public transport proposals include a range of actions for the development of public transport coverage, including enhanced integration with cycle infrastructure.
- Climate Action & Low Carbon Development (Amendment) Act legally binds Ireland to have net-zero emissions no later than 2050, and to a 51% reduction in emissions by 2030, against the baseline of 2018 emissions.
- National Sustainable Mobility Policy Action Plan 2022-2025 aims to improve and expand sustainable mobility options by providing safe, green, accessible and efficient alternatives to car journeys.
- "Smarter Travel – A Sustainable Transport Future, 2009" sets out necessary steps to ensure that people choose more sustainable transport modes such as walking, cycling and public transport.
- The Regional Spatial and Economic Strategy supports the delivery of key sustainable transport projects including MetroLink and Luas extension under Regional Policy Objective 5.2.
- The "Greater Dublin Area Transport Strategy 2022-2042" provides a framework for a sustainable transport network for long-term key projects including MetroLink, BusConnects, Dart+ Programme, Luas Finglas and the Greater Dublin Area Cycle Network Plan.
- The Greater Dublin Area Cycle Network Plan identifies the planned cycle network for the GDA and core to the proposed network is the delivery of infrastructure to facilitate multimodal "cycle – LRT trips", through the delivery of integrated Luas and cycling infrastructure.

Dublin City Development Plan

- Chapter 1 - Strategic Context and Vision: Core Strategy and Settlement Hierarchy (North West MASP corridor area) identifies Finglas Village Environs and Jamestown (SDRA 3 & KUV) for a mixed-use development with the potential yield of 2800 units, and Glasnevin as an area for mixed-use regeneration (Dublin Industrial Estate and Environs).

- Chapter 3 – Climate Action: Policy SC8 Development of Inner Suburbs
- Chapter 5 – Quality Housing and Sustainable Neighbourhoods: Policy QHSN11 15-minute City
- Chapter 6 – City Economy and Enterprise:
  - Policy CEE7 Strategic and Targeted Employment Growth
  - Policy CEE10 – The Outer City
- Chapter 8 – Sustainable Movement and Transport
  - Policy SMT1 - Modal Shift and Compact Growth
  - Policy SMT2 - Decarbonising Transport
  - Objective SMTO1 - Transition to More Sustainable Travel Modes
  - Policy SMT3 - Integrated Transport Network
  - Policy SMT4 - Integration of Public Transport Services and Development
  - Policy SMT5 - Mobility Hubs
  - Policy SMT11 - Pedestrian Network
  - Objective SMT02 - Improving the Pedestrian Network
  - Policy SMT19 - Integration of Active Travel with Public Transport
  - Policy SMT22 - Key Sustainable Transport Projects
  - Objective SMTO28 - Investigate the Feasibility of Pedestrian/ Cycle Connections (linking Broombridge, Tolka Greenway, Phoenix Park and the Dunsink Observatory; and linking East Wall to the Docklands Station/ North Wall/ Royal Canal).
- Chapter 13 – Strategic Development Regeneration Areas
  - Luas Finglas is fundamental to ensuring the successful delivery of regeneration at Jamestown based on planned and coherent integration between public transport infrastructure, land use and function.

- Masterplan for Ballyboggan is being developed in full anticipation of the Luas Finglas extension and will be consistent with TII's proposals as presented in the Railway Order.

Assessment

- DCC supports Luas Finglas and considers that the assessment of the proposal, as carried out in the EIAR and in terms of statutory and planning context, is satisfactory.
- Luas Finglas is a key infrastructure project for the city which will support strategic and planned growth in the Dublin MASP area.
- Luas Finglas reinforces the spatial strategy of the Development Plan and will integrate land use and transport and the continued consolidation/ densification of the city in line with compact growth principles.
- Luas Finglas will allow greater integration and more equitable access to employment, housing and educational opportunities.
- Luas Finglas aligns with the Development Plan and is supported by the higher-level policies in place.
- Luas Finglas will be a foundation that will support DCC in addressing major regeneration challenges to the north of the city sustainably.
- Luas Finglas will significantly contribute towards a reduction in transport-related carbon emissions.
- Proposal will be a critical piece of infrastructure to realise the full economic potential of the growth areas at Jamestown, Finglas and the Dublin Industrial Estate, Glasnevin. Planned transport improvements will play an important role in increasing the attractiveness of Dublin as a place to live, work and invest in.
- There is potential to provide a positive contribution to the urban design and public realm of the city through excellence in design and use of highest quality materials.
- It is important that the proposal adequately addresses *inter alia* conservation impacts along the route, as well as the potential to improve green infrastructure and pedestrian and cycle connectivity and permeability.

- Overall, the proposal would be consistent with the zoning objectives for the area and DCC is satisfied that the elements of the development that fall within its administrative boundary, would not have excessive or undue impacts on the amenities of the area.
- Proposed route alignment travels through Finglas Village KUV4 and would support the development and growth of the centre in line with the general principles for these centres.
- Should Railway Order be approved, it is recommended that a Project Liaison Office with multi-disciplinary input be established.

City Architects Division Comments:

- Welcomes the objectives of the proposed scheme to provide tram infrastructure along with enhanced walking and cycling infrastructure.
- There are transitions between new infrastructure and the existing condition which are not fully described by either the alignment or landscape drawings. Railway Order does not provide sufficiently detailed information for an assessment of its impact on the public realm.
- Drawings do not adequately identify public space, landscape and structures to be taken in charge.
- City Architect's Division requests that the development is subject to continued engagement during detailed design and construction stages.
- Railway Order does not fully detail the proposals to the extent that previous comments and queries submitted by the City Architect's Division are fully resolved.
- Siting of utility cabinets, poles and other above ground utility infrastructure may have significant impacts on the space, visual impact and quality of the public realm.
- Photomontages do not clearly show overhead line equipment (OHLE) - any impact or risk on trees/greening from OHLE shall be considered at detailed design stage.

- Proposals to retain and/ or reuse/ reposition boundary walls, railings, fences in the interests of the circular economy to be considered carefully along the scheme.
- Provision of minimum width footpaths in areas of high pedestrian traffic may not be sufficient.
- Safety audit should be carried out were pedestrians and cyclists share a surface for any distance. In some locations, bicycle storage/ racks are located such that cyclists must cross pedestrianised areas to access and this could create conflict. Footpath widths also need to account for congregations of passengers.
- Design of cycle lanes at bus stops and plans for improvements in Finglas Village must comply with the NTA Cycle Design Manual having regard to providing sufficient space to pedestrians, cyclists and commuters. Dimensions and setting of bus stops required. Reference to Greater Dublin Area Cycle Network also required.
- Accessibility Audit on the design does not appear to be included.
- Proposed scheme includes limited information on public realm improvements at Broombridge Station and tram stop, St. Helena's tram stop and adjacent spaces, Raven's Court, Finglas tram stop, St. Margaret's tram stop, and Charlestown tram stop.
- Confirmation sought on land acquisition and taking in charge. Responsibility for maintenance to be consulted through detailed design and construction.
- Insufficient detail to assess if required essential parking is being reinstated at the Childcare Development Centre. There are opportunities to provide electric charging points, e.g. Broombridge Station, Ravens Court, Finglas Village and Garda Station and St. Margaret's Court.
- Further clarification needed on material build up and finish intended for buff cycle track, surface finish, design life and construction detail two paving and kerbs, as well as a full palette of street furniture and whether there will be uniformity across the Luas scheme.

- Conservation impact statement and conservation method statement carried out by a RIAI accredited, or equivalent Conservation Architect Grade 1 or Grade 2, is requested for any proposed works to the existing stone bridge at the Royal Canal. More detail of works immediately surrounding or impacting the bridge, including cross sections, landscaping, access and protective measures is requested. Tolka River Bridge photomontage is limited.
- Cycle stands in pedestrian area at Tolka Valley Bridge potentially encourage cyclists to cross tracks on pedestrian paths.
- Further details on material selection and input for bike store/ shelter are required.
- There are concerns about security, anti-social behaviour and quality of public realm at the Finglas stop location. There is risk of graffiti and rust run-off at proposed park structures.
- Not clear where the Percentage for Art Strategy is to be incorporated into this project.
- Strategy for the rollout of water drinking fountains should be incorporated into the proposed scheme.
- 14 no. conditions recommended by the City Architects Division.

City Archaeology Section

- 14 cultural heritage constraints of high importance including town defences, a historic town, a monastic enclosure, houses, wells, bridges, canal, etc.
- Notes the potential archaeological impacts associated with the construction and operational phases and concurs with the proposed archaeological mitigation and monitoring measures outlined in the EIAR.

Forward Planning/ Development Management Section

- Boundary treatment and planting at the rear of St. Margaret's Station will provide both visual and acoustic screening for the neighbouring residential area.
- Unclear if a new wayleave is to be created to service land at 234 McKee Avenue. Details of boundary treatment between the proposed station plaza and the privately owned lands to the rear, as well as details of cabinets should be provided. Condition recommended.

- Proposed scheme should not prejudice the realisation of Jamestown Masterplan green infrastructure strategy with respect to de-culverting watercourses in the area.
- Applicant should contact Dublin City Council's Active Travel Office at detailed design stage to obtain the most current update on Royal Canal Greenway proposals.

Parks, Biodiversity & Landscape Services Division

- Drawings do not provide sufficient detail at 1:500; however, conditions recommended on liaison, tree bond, soft landscaping/ planting strategy, tree strategy, taking in charge, attenuation/ SuDS, etc.
- Detail sheet comments on tree pits/ planting; anti-social behaviour; use of green tracks; intervisibility of park users on tram drivers; visual impact of OLE poles and wires and CCTV; lighting restrictions; consideration of a stop in the park; detailed design at St. Helena stop; Farnham Park boundary treatment; provision of a path alongside Casement Road; pedestrian movement in the green area adjacent Cardiff Castle Road; impact of attenuation area opportunity for improved recreational offer in Mellowes Park; and further development of tree planting, SuDS and tree planting strategy along St. Margaret's Road.

Environment and Transportation Department

- Welcomes and is very supportive of the proposed extension of the Luas line to Finglas. Provision of segregated cycle and pedestrian paths alongside the route is also welcomed.
- **Noise** - Proposed development may help to reduce road traffic volumes in the area and associated noise.
- Recommends that TII consults with St. Helena Childcare Centre to confirm the noise control measures within the building and coordinate activities during the construction phase.
- It is questionable whether noise monitoring for a period of 24 hours or less is sufficient to establish a baseline - monitoring for a period of at least two weeks what provide a more reliable baseline. Comparison that baseline aligns well with the Strategic Noise Maps from Round 4 of the Dublin Agglomeration

Environmental Noise Action Plan appears to be limited to 4 of 23 survey locations, and covers sites very close to existing traffic sources.

- Not clear why Patrickswell Place is only considered medium sensitivity for operational rail noise.
- Noise assessment concludes that mitigation is required at one location and for one receptor only (St. Helena's Child Care Centre) - Some other locations appear questionable for daytime noise (2057) based on information presented in EIAR.
- Baseline for nighttime noise has been established against a very limited period of noise measurement. Baseline levels being used are in all cases a minimum of 5dB above the threshold and up to a maximum of 18dB above the threshold for nighttime noise. Questions whether the assessment should be based on calculated rail noise against the threshold rather than cumulative noise levels against the baseline.
- Receptors exposed to nighttime rail noise at Cardiff Castle Road and St. Margaret's Road - suggested that further consideration be given to final mitigation measures at these locations. Consideration should be given to providing suitable mitigation at any locations where rail noise thresholds are exceeded.
- Best way to mitigate noise impacts is to deal with them at the planning and design stage rather than leaving mitigation to subsequent rounds of the Environmental Noise Regulations.
- Careful consideration should be given to the design of the scheme to minimise noise levels at all receptors and to ensure that no new areas of higher environmental noise exposure are created.
- **Drainage Planning, Policy & Control** – Proposed use of SuDS is welcomed. SuDS design should refer to the new Dublin City Council Sustainable Drainage Design and Evaluation Guide, 2021.
- Concerns are noted in EIAR regarding commitments of surface water infrastructure and impacts on existing Integrated Construction Wetland (ICW) in Tolka Valley Park.

- Disappointing that application did not also include drainage drawings showing clearly the lines of demarcation between rail drainage agency another parties.
- Appears that a number of existing manholes are in close proximity/ adjacent to the proposed rail track.
- ICW will be impacted because the proposed railway line/ bridge will pass over Cell 1 of the ICW. Increased areas of impermeable surfaces including bridges and tracks will need carefully designed mitigation measures to ensure no increase in flows to the Finglaswood Stream.
- Flow regimes must not be affected by construction works or structures which could lead to alterations to erosion/depositional processes and changing scour patterns in watercourse channels and floodplains. There shall also be no deterioration of riparian margins or river substrate.
- Proposed mitigation measures not entirely clear and the approach to the ICW mitigation measures seems to contain contradictory statements. Not clear if proposed expansion compensates for area of lost habitat, or impacts on the riparian zone. Submitted drawings do not fully demonstrate the ICW proposals.
- Appears that mitigation proposes pumping as a permanent solution, where the existing ICW works by gravity. Proposal also seems to suggest that Finglaswood Stream will now bypass the ICW. Many mitigation measures for the ICW appear to be outside the red line boundary. ICW performs an important environmental function and the level of detail from a surface water perspective is unsatisfactory.
- **Transportation matters** – Active Travel Programme Office welcomes the Railway Order for Luas Finglas.
- Desirable minimum cycle track widths of 2m and an associated buffer of 0.5m should be achievable on Mellowes Road.
- Proposals for Finglas to Killester Cycle Scheme should be able to tie in safely with active travel proposals.

- Bus stop measures on Mellowes Road appear to be substandard – risk of pedestrian/ cyclist conflict at stop outside Garda station. Crossings on Mellowes Road would be Toucan crossings with minimum width of 4m.
- Stop lines are missing on the circulatory cycle lanes at junction of McKee Avenue and St. Margaret's Road And additional road markings are needed (primarily arrows).
- Toucan crossing midway between McKee Avenue and McKelvey Road should be a fully segregated, parallel pedestrian and cyclist crossing.
- **Traffic Sections** - Final detailed design for road layouts, signing and lining and traffic signals shall be agreed in writing prior to commencement of works.
- Traffic Advisory comments on tactile paving, stop lines, crossing details, swept path analysis, road safety audits, and adherence to standards.
- Traffic Signals comments on absence of full signalised drawings, traffic signalling agreement, Luas standalone crossings, and the location of trees and traffic signals.
- Public Lighting – no detailed lighting design and details on how existing street lighting may be affected. Trees may have blocking effect on lights and access for light maintenance. Luas station lights must be on separate electrical supplies.
- A total of 65 conditions recommended on liaison between TII and DCC; handover; existing condition record; roads design & construction; reinstatement and maintenance; construction period; air quality; noise and vibration; community engagement and notification procedures; out of hours work notification; operational phase; drainage and water protection; and public lighting.

Conservation Section

- Proposed work should, where possible avoid any direct material losses of historic fabric and take into account the setting of protected structures and other historic buildings, structures and settlements.

- Proposed Luas bridge is sufficiently close to have a significant and adverse visual impact on the setting of Broome Bridge, a protected structure, and on Finglaswood Bridge. Reconstruction of masonry where the existing pedestrian ramp is removed shall be specified by a conservation expert and executed by an experienced heritage stone mason in accordance with best conservation practice.
- Important that all existing fabric defects within historic bridges and canal walls are inspected, recorded in and detail and photographed. Defects shall be stabilised prior to construction of the new bridge to avoid further deterioration and repaired defects shall be monitored during construction.
- Recommended additional photomontages provided of the new bridge from the western side of the historic bridge. Only way to remove the visual impact on the setting of the historic bridge would be to locate the new bridge more remotely.
- Acknowledged that structural supports, details and guardings at all the new bridges at Broomsbridge and Finglaswood have been designed to a high standard to mitigate against the visual impacts arising on historic bridges.
- Proposed Luas is sufficiently close to have a significant and adverse visual impact on the setting of St. Helena's House, a protected structure. Utilitarian and perfunctory galvanised steel security railing is entirely inappropriate and detracts from the setting of the protected structure.
- It is possible that there will be some level of visual impact on Finglas Village Architectural Conservation Area.
- Mitigation measures and recommendations includes the use of expertise in architectural conservation to ensure adequate protection of retained and historic fabric during proposed works. Significant defects should be inspected and stabilised to avoid further deterioration of significant architectural heritage. Detailed specifications and method statements for any lifting/ temporary removal, storage and reinstatement, or any other conservation repairs, shall be submitted by conservation expert for written approval.

- All works shall be executed in accordance with best conservation practice and the Architectural Heritage Protection Guidelines for Planning Authorities (2011) and advice series.

7.5. Fingal County Council

- Proposal promotes sustainable travel and benefits the social, economic and environmental assets of Charlestown and the area which lies within Fingal.
- Sets out national, regional and local policy context.
- Luas Finglas supports local objectives in Fingal of becoming climate resilient, reducing car use and more frequent public transport.
- Section 5.6.7 of the Development Plan is explicit in its support for high quality public transport provision, including extension of the Luas network.
- Chapter 11 acknowledges that land-use planning, transportation, and the provision of essential infrastructure are interdependent and require and integrated approach by all stakeholders.
- Board will be aware of the development potential to lands at Dunsink of Luas Finglas and the importance of realising the green line extension to Tyrrelstown and city centre to Blanchardstown.
- Proposed new junction layout at Charlestown Place, St. Margaret's Road is significant. Consideration should be given that buses linking to the area will not be adversely impacted upon (queuing at nearby junction and adequate waiting area for future interchange).
- There will be the need for adequate secure bike parking near the terminus at Charlestown during the operational stage.
- *Planning Authority View in Relation to the Decision to be made by the Board:*
    - Fully supports the development of the Luas Finglas project.
    - Will provide high capacity, high frequency sustainable transport infrastructure linking Charlestown to the city centre and integrating with the wider public transport network.

- Represents a prime opportunity for strategic development and regeneration along the corridor.
- Have significant and positive impacts on communities along the corridor by promoting active travel, removing cars from local streets and making these areas more attractive and vibrant.
- Will bring about enhanced community integration between Charlestown, Meakstown and Dublin City and improved access to education, healthcare, employment, and amenities along the route.
- Fulfils key strategic objectives of the Development Plan including sustainable growth, healthy placemaking and economic prosperity, sustainable travel and enhanced connectivity and permeability.

- Conditions giving affect to community gain (sport, recreation, leisure, and community development initiatives) should be included in any forthcoming approval.
- Conditions should be in the form of direct provision/ once off direct capital contribution towards the provision of specific projects and an annual levy towards ongoing maintenance.
- Suggests that a committee comprised of members of the local community Fingal County Council and the applicant decide on the nature and extent of appropriate community gain projects arising.
- Refers to Objective DMSO123 on Section 48 and 49 Contributions.
- A total of 11 conditions are suggested including those relating to landscaping, construction management, C&D waste management, water supply and surface water management, hours of construction, noise control, spillages, undergrounding of services, financial contributions and community gain.

7.6. **National Transport Authority**

- Luas is a significant objective of the Government as expressed by, *inter alia*, National Strategic Outcome 4 of the National Development Plan and Measure LTR3 of the Transport Strategy for the Greater Dublin Area 2022-2042.

- Proposed development is central to the achievement of a wide range of national, regional and local objectives.
- Avoid-Shift-Improve principle is embedded within the NSMP and Transport Strategy and Luas Finglas will facilitate a move towards more environmentally friendly public transport.
- Compact Growth incorporating Transit Oriented Development drives land use policy at all levels - development of key locations has been pursued over time in tandem with the planning and design of Luas Finglas. Proposal will provide for close integration of land use planning and transport planning by facilitating compact growth in Ballyboggan, Jamestown and Charlestown through the provision of high capacity connectivity to range of employment destinations and other services.
- Proposed Luas Finglas integrates with the wider Dublin Metropolitan and Regional transport system by extending the reach of the metropolitan light rail network; extending the catchment of the permitted Dart+ West scheme; interchanging with BusConnects orbital and F-spine services; by providing strategic part and ride; and by providing cycle infrastructure as appropriate.
- GDA Cycle Network Plan identifies Finglas Road as the primary cycle route for this broader corridor leading to St. Margaret's Road - Facilities required for this corridor will be provided through BusConnects and by Luas Finglas on St. Margaret's Road. Parts of the route are also identified as secondary cycle network.
- Proposed development should, where feasible, cater for the delivery of elements of the cycle network within and adjacent to its boundary. Proposal would make a positive contribution to achieving the objectives of the GDA Cycle Network Plan within the constraints of the light rail scheme.
- Design should reflect the requirements of the NTA's Cycle Design Manual, particularly in relation to the width of some links and the continuity between sections (condition recommended).

- Luas Finglas overlaps with the Ballymun / Finglas to City Centre BusConnects scheme and it is considered that the requirements and objectives of BusConnects will continue to be delivered.
- Recommend the attachment of a condition that TII will liaise and coordinated with NTA.

7.7. Uisce Éireann

- No connections proposed to public infrastructure; however temporary connections to water supply is proposed for construction compounds. Connection agreements to be addressed by way of condition.
- There can be no impacts arising to public drinking water sources, or deterioration in water quality during construction and operational phases.
- Separation distances to Uisce Éireann infrastructure shall be in accordance with the Uisce Éireann's Code of Practice and Standard Details.
- EIAR refers to 60 potential major water infrastructure diversions and seven potential wastewater infrastructure diversions - applicant shall agree outline designs and Uisce Éireann can then provide the applicant with a Confirmation of Diversion Feasibility letter.
- Applicant has not provided sufficient information through the diversion inquiry process to support any agreement of the proposed diversions. Some proposed diversions would impact on existing access and maintenance arrangements.
- Red line boundary may not be wide enough at all locations to accommodate the measures required to divert, protect and maintain access to Uisce Éireann assets. Luas infrastructure will be built above Uisce Éireann assets and a 600mm truck watermain will be diverted and proposals cannot achieve the required separation distances.
- Recommends further information to include confirmation of diversion feasibility from Uisce Éireann to be submitted to the Board before any approval.

8.0 **Observations/ Objections Received**

8.1. A total of 39 observations were received by the Board on the proposed scheme. The applicant responded to each of these submissions and following the decision to not hold an oral hearing, a further round of consultation was help, which attracted 25 submissions. The tables below summarise the issues raised within the first round of consultation, separated into submissions from business and residential and other community organisations. The main points raised in these observations/ objections are described further under Sections 6.4 to 6.42; the applicant's response to same in Section 8; and the further responses from observers/ objectors in Section 11.

No.	Name	Zoning – non compliance	Supports proposal	Impact on business operation	Construction impacts including timescale	Access and Deliveries/ right of way	Lack of design detail	Traffic Study/ Impacts	Non-compliance with Jamestown Masterplan	Pedestrian/ active travel access	Scale/ duration of Acquisition	Impact on development capacity/ potential	Loss of parking	Boundary impacts/ road frontage
1	Adrez Ltd.					✓	✓	✓	✓	✓	✓			
2	Aldi			✓	✓	✓	✓			✓		✓	✓	✓
3	An Post		✓	✓		✓								
4	Appian			✓	✓	✓		✓						
5	Atlas			✓		✓					✓		✓	
6	Brooks	✓		✓		✓	✓	✓			✓		✓	✓
10	Downshire	✓		✓		✓	✓	✓			✓		✓	✓
8	Colorman	✓		✓		✓	✓	✓			✓	✓	✓	✓
12	Fashionflo	✓		✓		✓		✓		✓	✓		✓	✓
15	Firethorn			✓	✓	✓	✓		✓			✓		
16	Heetland		✓			✓				✓				
17	HPC Sales			✓										✓
20	Joe Duffy					✓								
22	Lidl			✓		✓		✓				✓	✓	

No.	Name	Zoning – non compliance	Supports proposal	Impact on business operation	Construction impacts including timescale	Access and Deliveries/ right of way	Lack of design detail	Traffic Study/ Impacts	Non-compliance with Jamestown Masterplan	Pedestrian/ active travel access	Scale/ duration of Acquisition	Impact on development capacity/ potential	Loss of parking	Boundary impacts/ road frontage
25	Megrick				✓	✓	✓							
29	Murdock			✓		✓	✓		✓			✓		
34	Polonez					✓	✓	✓		✓			✓	
38	Hamill & Cosgrove					✓	✓	✓	✓					

Table 8.1 – Submissions from businesses

No.	Name	Type	Supports proposal	Removal of Parking	Ravens/ St. Margarets Crt. loss of green space	Safety & Access (Ravens Court, Finglas Civic Centre)	Noise/ vibration	Boundary treatment	Increased Footfall & Security/ Anti-social	Link to Metro	Construction impacts/ disruption	Pedestrian/ disabled access	Improved cycle provision/ cycle-ped conflict	Ped. crossing facilities/ public realm/ desire lines	Junction reconfiguration	Privacy
8	Callaghan	Cllr.	✓	✓	✓	✓	✓		✓	✓						
9	Ellis	Cllr.		✓		✓			✓		✓					

No.	Name	Type	Supports proposal	Removal of Parking	Ravens/ St. Margarets Crt. loss of green space	Safety & Access (Ravens Court, Finglas Civic Centre)	Noise/ vibration	Boundary treatment	Increased Footfall & Security/ Anti-social	Link to Metro	Construction impacts/ disruption	Pedestrian/ disabled access	Improved cycle provision/ cycle-ped conflict	Ped. crossing facilities/ public realm/ desire lines	Junction reconfiguration	Privacy
11	Dublin Commuter Coalition	Advocacy group	✓									✓	✓	✓	✓	
13	Finglas Counselling Service	Counselling		✓		✓	✓	✓			✓					✓
14	Finglas Youth Resource	Youth support	✓	✓		✓	✓		✓		✓					
18	J&L O'Neill	Residents (Ravens)		✓	✓	✓	✓									
19	Caul & Neeson	Residents (Ravens)			✓	✓	✓									
21	John Duffy	Residents (Ravens)		✓	✓	✓	✓		✓							
23	M. Davitt	Residents (Ravens)		✓	✓	✓	✓									
24	Megan Coughlan	Residents (Ravens)		✓		✓										
26	Mellow Spring	Child care	✓	✓		✓	✓		✓		✓					

No.	Name	Type	Supports proposal	Removal of Parking	Ravens/ St. Margarets Crt. loss of green space	Safety & Access (Ravens Court, Finglas Civic Centre)	Noise/ vibration	Boundary treatment	Increased Footfall & Security/ Anti-social	Link to Metro	Construction impacts/ disruption	Pedestrian/ disabled access	Improved cycle provision/ cycle-ped conflict	Ped. crossing facilities/ public realm/ desire lines	Junction reconfiguration	Privacy
27	Michael Coughlan	Residents (Ravens)		✓	✓	✓	✓									
28	ML Coughlan	Residents (Ravens)		✓	✓	✓	✓									
30	Mooney & Hanlon	Residents (Ravens)			✓	✓	✓									
31	McAuliffe	TD	✓	✓	✓	✓	✓			✓		✓		✓		
32	Hearne	TD	✓	✓	✓	✓	✓		✓	✓	✓					
33	S. Coughlan	Residents (Ravens)		✓	✓	✓	✓									
35	National Graves	Memorial Association	✓						✓		✓			✓		
36	SI, CHB & TUD[1]	Combined	✓													

[1] Sport Ireland, Connolly Hospital Blanchardstown and Technological University Dublin, Blanchardstown Campus

No.	Name	Type	Supports proposal	Removal of Parking	Ravens/ St. Margarets Crt. loss of green space	Safety & Access (Ravens Court, Finglas Civic Centre)	Noise/ vibration	Boundary treatment	Increased Footfall & Security/ Anti-social	Link to Metro	Construction impacts/ disruption	Pedestrian/ disabled access	Improved cycle provision/ cycle-ped conflict	Ped. crossing facilities/ public realm/ desire lines	Junction reconfiguration	Privacy
37	Everitt & Jones	St Margarets. Crt. residents		✓				✓	✓			✓				✓
39	VVI[2]	Representative Organisation										✓	✓	✓		

Table 8.2 – Residential and other submissions

Other issues raised:

Broombridge should be redesigned as a less compact bus hub.

P&R will feature no bus transfer facilities.

Delay in accessible documentation

Public lighting

Flyover bridge along Broombridge Road

Proposed access road from McKee Avenue

Access/ security at Jamestown Business Park and ability to collect service charges

Alternative route along Finglas Road

[2] Voice of Vision Impairment

Impact on mental health

Impact on property value

Tree removal

Lack of consultation

Impact on Cardiff Castle Heritage site

Funding

Opportunity for all weather pitch at Farnham and to redesign Mellows Park

Tie in opportunities between Luas Finglas and Luas Tyrrelstown do not appear to have been considered in the design.

8.2. **Sudway & Company Limited Chartered Surveyors on behalf of Adrez Ltd., St. Margaret's Road**

- Oral hearing requested.
- It is currently possible to access the observer's site via St. Margaret's Road with an articulated lorry for deliveries.
- Appears that TII propose to acquire the internal road but drawing only indicates the extent of the permanent and temporary acquisition and does not provide any detail of the road design or layout.
- Only drawings which indicate anything remotely resembling a layout is contained in the landscape section of the EIAR and the Alignment Details Book - neither of these drawings could be construed as being a detailed design.
- Appears to be no traffic movement study carried out to assess whether the volume and type of traffic movements for existing properties will be facilitated.
- Proposal is not in compliance with the Jamestown Masterplan - observer made it clear during the preparation of the masterplan that a public road through their site would destroy its future development. Road should stop at observer's boundary and this would allow flexibility to develop the site and may also allow for some limited use of the existing commercial premises.
- There is uncertainty as to when the new access roads will be provided and therefore it would be premature for the Board to approve the scheme as currently proposed.
- Construction of public road through the site as currently proposed will have the effect of making all uses of the existing premises impossible.
- There is simply not enough room on the land to provide a properly designed road given that one of the tenants is a retail shop with a lot of traffic movements for deliveries and customers. It has not been demonstrated how deliveries to the front would work during temporary land acquisitions.

- There has been no consideration of how pedestrians would use the proposed road to access the retail unit - it would be unsafe to have pedestrians walking on a road with trucks and delivery vans.
- EIA is defective and does not address the environmental impacts on observer's property.
- Acquisition is excessive in so far as the lands are not required for the actual scheme itself, namely the provision of a railway.

8.3. **Aldi Stores (Ireland) Ltd. c/o John Spain and Associates**

- Requests oral hearing.
- Lands proposed for permanent and temporary acquisition and the extinguishing of private rights shall be utilised for a mix of cycle track, bus stop, landscaped and planted footpath edge, pedestrian footpath, low shrub and herbaceous planting, and asphalt carriageway.
- Concerned with the implications on the operation of the existing Aldi store on St. Margaret's Road – Luas line and associated cycle and pedestrian infrastructure will significantly encroach upon the eastern edge of the Aldi store, and result in the loss of 19 car parking spaces (minimum).
- Construction phase will have a substantial impact on the trading environment for the Aldi store and its accessibility from St. Margaret Road. Concerned regarding the lack of detail within the draft Railway Order and the duration of the temporary acquisition.
- Proposal will potentially require a planning application for revised layout at the Aldi development.
- Temporary land take extends to the eastern elevation and will disrupt the primary access to the development, including the retail units to the north.
- It is likely that the time scale will be greater and 3 ½ years given the complexity of large scale infrastructure projects. Objector concerned with the commercial impacts on store revenue during this phase.

- Impacts on entrance from St. Margaret's Road will have implications for deliveries - there is a lack of detail in relation to the management of traffic and delivery movements to and from the store. Restriction on truck movements will pose a health and safety issue.
- Mitigation measures for businesses is on the eastern side of St. Margaret's Road should extend to the western side including the Aldi store.
- Reduction in parking should be provided for elsewhere on the site or adjacent, and referred to in the Railway Order.
- Details should be provided to confirm the purpose of the temporary possession and in what form this will take in practice, i.e. to assist construction as a compound, provide parking, etc.
- Requests further details and engagement with TII in relation to road closures and potential impacts on accessibility. Seeks firm commitment from applicant that access to the Aldi store will be maintained at all times during construction.
- Letter from transport consultant attached to objector's submission notes the lack of technical information submitted to enable a proper assessment of the Luas extension.
- No details are being provided on how the realigned road will provide pedestrian access, access for cyclists, and access for non-able bodied to the Aldi site.

8.4. **An Post, c/o RMLA Planning Consultants**

- An Post operate a Delivery Service Unit at Jamestown Business Park, which is long established in providing an essential public service delivering mail and parcels across Dublin.
- An Post fully supports the need to upgrade the public transport network and TII and the Board are requested to consider the importance of maintaining safe access for all road users during construction. An Post are willing to engage with TII during all the stages of the planning process and construction phase of the project.

- It is imperative that in order to protect the smooth operation of the existing postal service, that unrestricted access for staff, customers and deliveries/ collections are protected.
- Any limitations and impacts such as road closures can have serious knock-on effects on the ability of An Post to meet the postal needs of the public and service their legal agreements with the State.
- An Post's operational requirements at Jamestown Business Park, including HGVs, deliveries, early/ late operational hours, etc. are of critical importance to the public service. Welcomes direct engagement with TII to ensure minimal disruption during construction and advanced notification of any planned road closures.

8.5. **Appian Holdings Ltd. and Mongey Plunkett Motors, c/o Hughes Planning & Development Consultants**

- Requests oral hearing.
- Requests that the Board duly consider the negative implications arising on observer's lands as a result of the construction phase.
- Car dealership and vehicle repair and maintenance service carried out on observer's site is heavily reliant on the surrounding road network and it is imperative that unimpeded access is available at all times.
- Significantly scaled park and ride facility will be located on neighbouring site and there is concern that the construction works will adversely impact of observer's business. There will also be an uplift in traffic along North Road as a result of the park and ride facility. Observer asks the Board to carefully consider the impacts of such as facility and whether this is the most appropriate location for same. Assurances are sought that any impacts from the facility would be mitigated as far as possible.
- Established rights of way which facilitate access to the south of observer's site will be extinguished as per the current proposal as submitted. All viable alternatives should be considered to maintain established rights of way or loss of these private rights should be appropriately compensated for.

- TII should engage with the observer to identify appropriate mitigation measures to ensure the safeguarding of commercial viability of their property during construction and operation.

8.6. **Atlas Autoservice Ltd. c/o Kellarch Ltd.**

- Loss of 16 car parking spaces would have an unsustainable impact on the car servicing business.
- Major realignment of St. Margaret's Road cannot be executed without disruptions - high level of site management and agreement will be required to mitigate this this disruption.
- Drawing appears to show that the present back of the footpath at the Atlas site will not be altered - Board should review this detail to determine if indeed the temporary or otherwise, acquisitions are required.
- Business owner confirms that the Atlas Autoservice depot in Finglas has been operating in the local community for many years and is one of their busiest motor vehicle servicing centres.
- Business has 14 staff working on a daily basis dealing with an average of 30 customers vehicles per day.
- On any given day, up to six extra customer cars remain on site for a number of days that could be waiting on parts, etc.
- There would be approximately 12 deliveries each working day coming in and out of the car park/ outside areas.
- Observers have an upstairs area that they intend to use as a training school.
- Observers cannot afford to lose any of their current car park or outdoor area space with the number of vehicles and customers/ staff utilising them on a daily basis six days a week.

8.7. **Brooks Timber & Buildings Supplies Ltd. c/o Hughes Planning**

- Requests oral hearing.

- Proposed development has not had regard to the daily operations and development capacity of observer's lands at Broombridge Close.
- HGVs currently circumnavigate the site, thus allowing unhindered offload/ collection of goods.
- Proposal will have a significant impact on observer's site due to the extent of land acquisition for permanent/temporary use; reduced attractiveness for existing/ potential customers due to reduced operational efficiency; and increased operating costs due to hiring additional personnel for traffic management.
- Scheme will provide for a significant revision of existing boundary treatments between the subject site and the adjoining road network along its eastern boundary.
- Observer's concerns present a material rationale for the seeking of compensation in the event that TII does not see fit to make appropriate amendments to the scheme to ensure no detrimental impact on commercial operations on the associated monetary value of same.
- Proposed Railway Order will permanently disrupt the longstanding way the site has been operated by removing the ability of HGV's to circumnavigate the site; by removing several parking spaces; and by removing a significant quantum of external storage area.
- Slower turnaround times for deliveries and collections will result in frustration and inconvenience for customers and increased likelihood that customers will seek alternative suppliers.
- New requirement for reversing manoeuvres onto incoming traffic will present significant safety risks. This will likely require site specific instruction on training procedures. Proposed changes leaves observer's business exposed to liability and creating unsafe conditions for all stakeholders, which may contravene relevant provisions under the Safety, Health, and Welfare at Work Act 2005.
- Works to Broombridge Road are wholly accommodated by virtue of the extension of this road westwards - requests that an alternative solution is found to ensure the protection of the existing business.

- Subject proposal is not compliant with the Z6 Employment/ Enterprise zoning objectives for this area.
- Applicant should conduct a site specific traffic impact assessment and the inclusion of appropriate safety infrastructure such as barriers, signage, undesignated pedestrian zones to mitigate risks associated with any unavoidable changes.
- Observer confirms their willingness to engage with TII in relation to public realm improvements and access infrastructure upon lands within their control.
- True assessment of impact as it affects the property is challenged without accurate final design drawings, thus limiting the scope of the objection lodged.
- EIAR is incomplete due to the lack of proper information regarding the design and construction methods to be employed. Alterations can occur during the design and construction phase without consultation with the affected landowner.
- Generic solution proposed by TII instead of an engineered site-specific solution – there is a lack of detailed design and site specific mitigation showing how the existing business is to operate.
- Should consider the proposal to ensure that the road works are revised to provide significantly reduced impacts on observer's land.

8.8. **Downshire Propco Ltd., 184 Newry Road, Banbridge, Co. Down**

- This submission relates to the land owner of the Brooks Timber & Buildings Supplies Ltd. site, which also requests the holding of an oral hearing. The submission repeats the same points raised in the submission on behalf of the tenant, Brooks Timber & Buildings Supplies Ltd.

8.9. **Cllr. Mary Callaghan, City Hall, Dame St.**

- Strongly supports the extension of the Luas Green Line to Finglas - delivery of this public transport infrastructure is essential to benefiting the social and economic interests of Finglas, and serves as a major opportunity for the area's regeneration.

- The projects importance should be recognised in respect of moving from cars to public transport, thus contributing significantly towards climate action.
- Several houses on St. Margaret's Road (opposite McKelvey) will have some of their driveways/ front gardens removed – stakeholders should engage with residents in relation to where exactly compensatory parking spaces will be and how the arrangement will operate.
- Green space in St. Margaret's Court should be retained or provided elsewhere in the cul-de-sac. St. Margaret's Court residents also concerned about the possible lack of parking in the estate because of the current plans, as well as noise nuisance from trams.
- Residents from Ravens Court are also concerned about the loss of green space in their estate.
- Access to Raven's Court will be dangerous, particularly for young children, with trams passing every few minutes. Mitigation or route revisions should be put in place. Emergency service vehicles will also be impacted.
- There is a severe lack of parking in Raven's Court and proposed Luas may make this problem worse.
- There will be significant disruption, including noise from passing trams, and residents would like to be informed how this will be mitigated and addressed in full.
- Finglas Youth Resource Centre is concerned about disruption to its services as part of the 2nd, 4th, 9th and 10th Schedules under the Railway Order:
    - Land required under 2nd Schedule includes a car park, which is an essential resource for the centre's staff - alternative parking arrangements should be considered.
    - Questions about land temporarily required under 4th schedule and whether access to the front of the building will be restricted. If so, rear access should be made available.

    - In respect of public and private rights of way being extinguished under the 9th and 10th schedules, there is a possibility that the centre would have to cease operations or relocate.
- Risk assessments should be carried out and regular health and safety meetings should take place to identify and mitigate potential hazards for young people who use the FYRC.
- Centre is concerned that the planting of additional trees near the counselling and training rooms will not adequately mitigate noise.
- Increased footfall may result in the centre transitioning from an open door policy to an invitation only one - front door would then require modifications and enhanced security features.
- There is a missed opportunity to link Luas Green Line with the proposed Metrolink at Ballymun.

8.10. **Colourman (Ireland) Ltd. c/o Hughes Planning & Development Consultants**

- Requests oral hearing.
- Proposed development does not have full regard to the daily operations and development capacity at observer's site located on the eastern side of Broombridge Road and to the immediate north of the Royal Canal Way towpath.
- If lands indicated for temporary acquisition are required for long periods, it has the potential to damage and devastate the business and seriously jeopardise its commercial viability.
- Company currently employs over 200 people, most of whom work from the current premises on Broombridge Road on a daily basis. Proposed development will put significant pressure on car parking that will remain on site.
- New access point onto Broombridge Road is proposed by TII but there is an apparent lack of detail as part of the Railway Order as to when this access will be provided, and the design specifics associated with same. Existing access to the site from Boyne Road is not suitable in its current form to accommodate both staff/ visitor vehicles and larger goods vehicles during Luas works.

- Acquisition required for this project, together with the temporary acquisition required along the southern boundary as part of the Dart+ West project, will result in a virtually unworkable on site situation.
- There is a lack of clarity regarding the effect of works on the existing boundary treatment and what will be proposed in its place in order to secure observer's premises.
- Approximately 891 sq.m. of observer's premises will be permanently acquired and over 1,000 sq.m. will be temporarily acquired. More suitable alternative must be considered further by TII which poses less detrimental impacts to existing businesses, e.g. western side of Broombridge Road for site compounds.
- Area of Colorman owned lands subject to temporary and permanent acquisition is entirely excessive. Less land intensive alternative must be explored further.
- Does not appear that any phasing plans where submitted as part of the Railway Order and therefore sequencing of construction programme is unknown. Lack of clarity regarding access design and delivery timeframe places a significant degree of uncertainty as to whether it would be possible to continue with operations at this location. Requests that access to the premises from Broombridge Road is maintained at all times.
- Significant land take and disruption of the longstanding way that the site has been operated will lower the value of this property. Larger HGVs will have to travel through staff and visitor parking areas and there are concerns this will create road safety issues on site. Additional resources will have to be allocated to mitigate safety risks.
- Proposal is not compliant with the applicable Z6 zoning objective for the site as it will indirectly compromise the daily operation of the existing commercial business.
- Board is asked to consider a reduced area for permanent and temporary acquisition at this site; further details of entrance arrangements and a traffic assessment; and a detailed construction programme and time frame for delivery.
- TII should engage directly with observer to identify appropriate mitigation or compensation.

8.11. **Dessie Ellis TD, Poppintree Mall, Finglas**

- Proposal to use the back of Finglas Leisure Centre and FYRC is not a solution to loss of existing parking to the front of the buildings - There is not adequate space at the back to support the existing volume of cars for both staff and clients using these facilities.
- Proper pre construction arrangements should be put in place that will take account of the health and safety of those using existing facilities at this location.
- There should be greater clarity regarding access at the rear of the DCC building and FYRC for parking.
- Consideration should be given to the safety of people accessing the buildings, especially young people, who may also have to cross the tram lines.

8.12. **Dublin Commuter Coalition, Kill Avenue, Dún Laoghaire**

- Very supportive of Luas Finglas but have identified a number of issues that they would like to see rectified.
- Encourages the delivery of Luas Finglas as soon as physically possible.
- *Pedestrian access to Broombridge Station* - distance to southbound Irish Rail platform will be quadrupled from 70m to 270m.
- Current design is a missed opportunity to enhance access to the Irish Rail platforms particularly with the redevelopment plans for the industrial estate.
- People with mobility issues will be forced to rely on an elevator to get across to the platform - elevators can be out of service with little or no notice.
- Access ramp from Broombridge Road should be retained in some form.
- *Cycling access to Broombridge Station* - design creates a large risk of conflict between users across the steep humpbacked bridge due to limited visibility. Southbound cyclists will have to turn back on themselves. Junction should be made safe for cyclists as part of the conditions of approval.

- There is an opportunity to provide segregated cycle access on the side of the Luas bridge which would enhance access to the station. Bridge would need to be wider as can be seen on the Tolka Valley Bridge.
- *Junction of Ballyboggan Road and Tolka Valley Park* – There is space on Ballyboggan Road for cycle lanes on both sides. Connection from cycle track to eastbound cycle lane is also unclear.
- Cross section shows cycle track width only 3.2m for 2-way cycle track on Broombridge Road.
- Cycle track through the park is below the desirable minimum width outlined in the national cycle design manual of 3m. There is adequate space for increased width.
- *Tolka Valley bridge and cycle track* – 3m cycle track along bridge could be extended to provide a pedestrian space. Pedestrians will use the dedicated cycle lane given peoples natural desire lines.
- *Discontinuity of cycle track after St. Helena's Stop* – should be continued alongside tram route through the park as a two-way cycle track. Farnham Drive listed as secondary cycle route in the Greater Dublin Cycle Network 2022 but there is no cycle provision included in the design. There are also schools to the east on St. Helena's Road.
- *Junction of Finglas Road and St. Margaret's* - positioning of yellow box and stop line on northbound section invites cars to advance to the stop line and block the tram lanes. Entire area between first stop line and pedestrian crossing should be designated in yellow.
- Staggering of pedestrian crossing on Finglas Road is not aligned to DMURS. Two-stage crossing leaves pedestrian isolated on traffic islands and may encourage pedestrians to cross during a break in traffic.
- Cycle parking provided in park and ride building but there is no cycle lane provision on North Road, which is designated a primary cycle network.
- Cyclops layout would significantly improve cyclist and pedestrian utility at protected junction TL502 and at the Lidl car park entrance.

- Junction design chosen for McKelvey Road and St. Margaret's Road does not appear in the National Cycle Design Manual. TL502 protected T-junction design would provide shorter crossing distances and better cycle visibility.
- Junction at the Charlestown stop would be improved if Cyclops design was utilised. Cyclists going straight through the junction would have their visibility increased to left turning cars and pedestrian crossing distances would be shortened.
- Appropriate amount of public lighting should be put alongside the new cycleways and footpaths. This is particularly important in the new green areas in previously unused parklands for safety reasons.
- Secure lockers should be provided at the new tram stops, in addition to an appropriate amount of Sheffield bike stands.

8.13. **Fashionflo Ltd. c/o Sheehan Planning**

- Requests Oral Hearing.
- Objects to the Railway Order and calls on the Board to refuse to confirm/ grant Railway Order.
- Proposed development will impact all vehicle movement on site and will greatly reduce parking. About 60% of site's entire road frontage will be lost and it appears that pedestrian access will not be possible from Broombridge Road.
- Objector would be interested in a modified scheme presented at an Oral Hearing or conditions to any grant, including, for example, extension of flyover bridge further along Broombridge Road. This would allow the track to be moved further west.
- Some 50 employees are associated with the operation of the site. Accessibility by rigid and articulated trucks to the site is required. Vehicle access from Broombridge Road will be severed as part of the Railway Order.
- Development Plan states that Z6 zoned lands constitute and important land bank for employment use in the city, which is strategically important to protect. These lands provide for intensive employment and accommodate a wide range of local

services. Uses in this zone are likely to generate a considerable amount of traffic by both employees and service traffic. Sites should, therefore, have good vehicular and public transport access.

- Proposed revised access arrangements will result in increased complexity and traffic hazard for pedestrians and cyclists in a changing junction environment, with HGV movements being particularly problematic.
- Proposed land take and new access arrangements will create highly complex HGV turning movements for on-site loading docks and egressing in forward gear. Swept path analysis shows that articulated truck movement will likely become impossible.
- Egressing eastbound HGVs would encroach on the opposite lane up to c. 18m upstream from the yellow box, and any westbound queuing would prevent such a turning movement.
- Temporary land take will prevent HGV circulation by severing the northern and southern portions of the site, with no mitigation proposed.
- HGV gate will be located at the corner of the site, with acute angles to be expected between approaching and egressing trucks and pedestrians. Queuing across the access on Lagan Road may frequently occur, thereby further hindering site access and egress.
- Routing of commercial vehicles through car park will give rise to traffic hazard. Land take will result in loss of c. 70% of existing on-site car parking capacity.
- Proposed land take will affect the site's long-term viability for zoned employment land use.
- Board is asked to consider the following mitigation measures:
    - Retention of site access on Broombridge Road via an underpass or modification of Luas track and provision of traffic signals.
    - If the above is not possible, alternative access arrangements should be identified so that excessively complex turning movements are avoided, e.g. via Colorman site to the south.
    - Reduction in temporary land take, duration clarified, and mitigation identified.

- Proposed development is not consistent and may materially contravene the site's zoning.
- Acquisition of land will further prevent and/or severely impact the viability of the business and will reduce the value of the site.
- Railway Order would have a disproportionate impact on objector's property rights, would diminish the value of their land and would be contrary to the proper planning and sustainable development of the area.
- Submission accompanied by a transport submission prepared by transport consultants.

8.14. **Finglas Counselling Service Board of Management**

- Currently leasing a property at D11 R2N1 and are providing a non-profit low cost community counselling service to over 100 client per week.
- Any disruption to service will have real life impact to clients and trainees.
- Main concerns are access, privacy and noise. Request that following works take place before construction work starts:
  - Relocation of entrance and front door to the opposite side at fire station including wheelchair ramp.
  - Building should be soundproofed and insulated including windows.
  - Boundary treatment to protect privacy.
  - Car park area at back of building for six car spaces beside new entrance.
- If service cannot remain in situ, it is requested that a suitable facility be sourced within Finglas village.

8.15. **Finglas Youth Resource Centre CLG, c/o Martin Eastwood**

- Car park to be permanently acquired is an essential resource for staff, and for recruitment and retention efforts. Seeks alternative parking arrangements.
- Seeks timeline for when land will be under temporary possession and options for access to the building.

- Queries weather extinguishment of public and private rights of way would necessitate FYRC to cease operations or relocate. Relocation could present significant challenges for young people and staff. Seeks clarification as to whether temporary or permanent shutdowns are expected.
- Proposes that risk assessments are carried out to identify and mitigate potential hazards for individuals using the building and surrounding areas during construction.
- Concern that additional planting of trees near counselling and training rooms will not be adequate to mitigate noise. Requests the inclusion of proven soundproofing measures to minimise impact.
- Have historically operated an open door policy and increased footfall outside the centre may necessitate an invitation only access policy - requests modifications to door to incorporate enhanced security features.
- Introduction of Finglas village stop raises several concerns relating to anti social behaviour, congregating gangs, and risk of injury.
- Strongly supports Luas Finglas subject to parking solutions; access during temporary possession; noise mitigation; front door security; health and safety; clarity on rights of way; and safety of young people.

8.16. **Firethorn Ltd. (Manhattan Peanuts Ltd.) c/o Hughes Planning & Development Consultants**

- Requests an Oral Hearing.
- Proposed development has not had regard to the daily operations and development capacity at Manhattan Peanuts Ltd., McKee Avenue, D11 F654.
- Loss of lands along St. Margaret's Road will impact on the accessibility and development potential of observer’s lands – lands have significant capacity for development as demonstrated under Reg. Ref: 3364/23.
- New access route from McKee Avenue should be revised to mitigate the proposed impacts on the subject lands. Proposed road involves a concerningly

large portion of observer's lands, which would be detrimental to the existing and proposed plans for the site.

- Proposed access road does not align with that contained within the Jamestown Masterplan. New access road should only run up to the boundary of observer's land.
- EIAR is incomplete due to the lack of proper information regarding how the proposed design correlates with the adopted Jamestown Masterplan.
- If Board is minded to approve the Order, a condition must be attached that the proposed road from McKee Avenue is built and in operation prior to the St. Margaret's front access being removed.
- No phasing plans submitted with Railway Order and therefore sequencing of construction is unknown. Given the lack of detailed design and mitigation measures showing how the business is to operate, it would be premature for the Board to approve the scheme at this juncture.

8.17. **Heetland Ltd., c/o Padraig Kehoe, South Circular Road**

- Heetland is owner of Jamestown Business Park. Supports the scheme but would like the following clarified:
  - Extending footpath from St. Margaret's Road through the estate to make pedestrian access safe.
  - St. Margaret's Road entrance has a full time manned security hut - no details are being proposed as to how access/ security can be maintained or controlled to the remainder of the estate.
  - Lands to be acquired are to facilitate a new public road. Some units which are inside Jamestown Business Park will find themselves outside the estate - this will have implications for the ability to collect service charges from these units.
  - Provision of new road through business park will cut off the loading bay to unit 34/ 35, along with making access to units 36 and 37 very difficult.

8.18. **HPC Sales, c/o PCOT Architects, Fitzwilliam Square North**

- Observer currently leases Units 125/126 Broombridge Close, Ballyboggan Road, D11 H003 (TJ O'Mahony builder providers).
- Dimensions of area lost vary in size from approximately 2.5m at Ballyboggan Road/ Broombridge Road junction to approximately 7m on Broombridge Road. This sterilises 56m of road frontage.
- Both proposed and temporary acquisition areas occur within an area which is fundamental to day to day operation of the premises. There is an existing door on the eastern elevation used for deliveries and access and trucks will no longer be able to turn.
- Day-to-day operation will be untenable and trading from the premises will no longer be commercially viable.
- If Railway Order is granted, a condition should be attached modifying the route to omit the CPO affecting observer's premises.

8.19. **Jack & Lily O'Neill, Ravens Court**

- Main concern is safety of pedestrians, especially children, living in Ravens Court and Cardiff Castle Road.
- Passing trams every 3.5 minutes is an obvious increase in risk of a collision.
- Proposed plan introduces a blind spot where a child darting out from the cul de sac would potentially appear from behind a brick wall into the path of the Luas. TII confident that low speed would mitigate such a risk; however, 2021 study (Gaca, S. and Franek, L., 2021) into the impact of tram speed on pedestrian fatalities estimates that the fatality rate to be as high as 10% at speeds lower than 10km/h and recognises increased risks for children. Design should be revised to remove hazard, e.g. by installing gates at entrance to cul de sac.
- Proposal will result in loss of green space and amenities in Raven's Court. Green space is extensively used as a safe and quiet play area for children. Additional green space should be provided within the estate to mitigate loss.

- Proposal will dramatically change the noise environment. TII estimates that the noise levels of a Luas turning a corner is 77-80 decibels, which is significantly above the 45 decibels limit recommended by WHO to prevent sleep disturbance at night. Measures to prevent sounding of Luas bell may present an additional safety risk. Suggests that houses be insulated with sound proof materials and windows.
- Concerns regarding emergency services access to cul de sac, along with services such as bin trucks and oil lorries. Credible access proposal should be developed in consultation with Dublin Fire Brigade and National Ambulance Service.
- Residents are reliant on the parking provided on the curbs at the entrance, which will be lost – suggest that additional parking be provided within the estate boundary if the current space is repurposed.
- Much of the planning and assessment done for the rest of the route was not carried out in Raven's Court.

8.20. **Jennifer Caul & Jason Neeson, Ravens Court**

- Concerned about young children in the estate and the blind spot so near rail tracks, which poses a risk of serious injury or death.
- Residents did not receive a satisfactory answer as to how any emergency services would access the estate without delay. Deliveries will also be impacted.
- Green area within estate will be lost, which is used for leisure and child play and parking.
- Concerns about vibration during construction on existing houses and to long term damage when Luas is operational.
- Noise levels will increase significantly – trams will be slowing down and applying the brakes, which will give rise to noise.
- Luas should take an alternative route along Finglas Road – disturbance to people's property and lives could then be kept to a minimum. It would also pass through a high population catchment.

8.21. **Joe Duffy Property Company Ltd., Charlestown, D11 XH5N**

- Folio DN161215F includes a right of way along the rear of the property, which forms part of the proposed scheme – this folio is in the freehold ownership of Joe Duffy Property Company Ltd.

8.22. **John Duffy, Ravens Court**

- Requests Oral Hearing.
- Objects for similar reasons relating to safety risk to elderly/ vulnerable and children; blocking of access to the estate; car parking; noise and vibration; and removal of greenspace.
- Residents will no longer have access to greenspace within walking distance that does not have Luas tracks.
- Proposal will negatively impact of residents' mental health.
- At present, Ravens Court is affected by noise from Garda Station.
- Section of track opposite Erins Isle GAA Club and pitch at Mellowes Park will require children to cross the track to play matches or train.
- Ravens Court would be left with just 5.8% of greenspace when the estate presently has 10.5%. Should be at least 10%.
- Proposal will impact negatively on property prices – tracks will be too close.
- A total of seven green areas will be destroyed (Tolka Valley Park, Barnamore Park, Farnham Park/ Erins Isle GAA pitch, Farnham green area, Cardiff Castle Road green area, Ravens Court green area and Mellowes Park). Established trees will also be removed in these areas.
- Concerned about removal of car parking at Finglas civic centre – this will impact on the surrounding area, including Ravens Court, Cardiff Castle Road and Mellowes Estate.
- There is no parking at the St. Helena's stop and limited parking in the already busy car park at the village stop.

- Route would be better suited on the N2 to serve both sides of Finglas, or be pushed west along Cardiffbridge Road.
- Village stop is actually 500m from the village.
- St. Helena's stop is in an area dominated by anti-social behaviour at night and the stop will be isolated from nearby housing and shops.
- Hasn't been possible for residents of Ravens Court to engage in meaningful consultation.
- Estate is already quite small and will be reduced further in size.

8.23. **Lidl Ireland GmbH, c/o BMA Planning**

- Submission being made in respect of Lidl Supermarket on St. Margaret's Road and Discount DIY on North Road.
- Construction phase will make Lidl supermarket difficult to access for customers, as temporary road layouts and additional traffic signals will be required. Store may need to cease trading for a period of time or work to restricted hours. HGV access will also be impacted.
- Existing Lidl car park will be reduced by c. 35 spaces, which represents a loss of 38% of existing parking. Access to alternative spaces in park & ride is not possible in the current configuration and therefore this offer or mitigation only applies in a redevelopment scenario.
- ESB substation is proposed to be relocated into the Lidl supermarket site – TII should find an alternative location for reasons related to traffic hazard.
- Permanent acquisition of land to the rear of Lidl will have implications for the maintenance and management of the supermarket.
- Acquisition of Discount DIY site for a park & ride significantly impacts on the development potential of the overall lands, whether independently or as an integrated development across both sites. Acquisition of these lands will mean that this potential is lost to Lidl permanently.
- Lidl is willing to continue to explore the option of redevelopment of supermarket to integrate with the future park & ride structure – Railway Order should be

amended to more clearly describe and define the accommodations for Lidl within the proposed park & ride, Including access and number of spaces.

8.24. **Mary Davitt, Ravens Court**

- Observer will lose some of these back garden and communal open space.
- Also objects for reasons relating to decrease in play area and parking; safety risks to elderly/ vulnerable and children; access; noise and vibrations; visual impacts; devaluation of homes; congestion; impact on Cardiff Castle heritage site; impact on mental health; and consideration of alternative (Finglas Road).

8.25. **Megan Coughlan, Ravens Court**

- Residents own 17 cars and there are 10 parking spaces in Ravens Court - even without visitors there is no space at all.
- Bins are put on the pathway to the entrance for collection and they are placed where the Luas is proposed.
- Also concerned about access, safety of children, deliveries, and emergency services.

8.26. **Megrick Limited, c/o Sudway & Associates Ltd.**

- Requests oral hearing.
- Board should indicate the provisions of the Planning and Development Act 2024 which will apply, and which will ensure the incorporation and application of the compensation provisions of the 1919 Act to this case.
- Acquiring authority have not demonstrated that funding is available to implement the proposed scheme and complete its construction. This will cause unfair delay in the implementation of the project.
- Detailed final design drawings for the scheme should be submitted to the Board for their approval as part of this application. Lack of final design drawings will create delays and uncertainty over an unacceptably long period in relation to the future development of claimant's retained lands. Deviation areas contained in the

application make it extremely difficult for observers to progress with any proposals to redevelop the site. This constitutes a contravention of the landowner's rights.

- In the event that lands are to be acquired temporarily, the CPO must state the precise nature of the interest to be acquired, including the duration of time. Information must also be provided on the precise works to be carried out.
- Lands to be permanently acquired cause considerable severance to observer's retained property. Appears that these lands are being acquired solely to provide access to the retained lands of adjoining owners - acquiring authority has not made a case for the inclusion of these lands in the CPO. Not known if this access will be a private or public road and TII or NTA are not a road authority with any capacity to take these lands in charge. This plot and associated temporary plots should be removed from the CPO.

8.27. **Mellow Spring Childcare Development Centre, Finglas Civic Centre**

- Supports the project but believes it is crucial to address key challenges to ensure the continued operation and safety of observer's service.
- Removal of car park outside FYRC building is a significant concern as it will increase reliance on parking in front of Mellow Spring. Alternative parking arrangements should be discussed.
- Temporary possession and access timeline is requested - it is essential to establish safe entry and exit routes for children and families during construction.
- Any relocation of public and private rights of way or extinguishment would present a significant challenge given the difficulty of finding premises for 135 children.
- Construction activities could pose risks to families and staff who access the building daily - regular risk assessments and health and safety meetings should be conducted to identify and mitigate potential hazards.
- Designated sleep room is located at the front of the building - seeks assurances that tram noise will not disrupt the building's interior. Requests proven soundproofing measures such as cladding or soundproof windows.

- Proposed Finglas village tram stop will increase footfall and associated risks.
- With thoughtful planning and clear communication, this project can benefit the entire Finglas community.

8.28. **Michael Coughlan, Ravens Court**

- Objects for reasons relating to proposals to acquire 3m from the estate, car parking, bin collection and deliveries, obstruction of traffic, safety for children, devaluation, construction and operational noise, and emergency access.

8.29. **Michael Liam Coughlan, Ravens Court**

- Objects to the proposed route of Luas Finglas past Ravens Court.
- Objects for reasons relating to car parking, noise, safety, oil deliveries, emergency access, and refuse collection.
- Reduction in space will greatly impact on the lives of residents of Ravens Court.

8.30. **Murdock Builders Merchants, c/o Hughes Planning & Development Consultants**

- Requests an Oral Hearing.
- Proposed development will significantly impact on the ability of the subject lands to carry out their daily operations by impeding access to the site and resulting in complications for the future development of the site.
- Subject lands are considered to have significant development capacity due to their locational context, availability of services and amenities, and support within the Development Plan for development of vacant and underutilised sites and well served areas.
- Murdock Builders Merchants currently operate a clockwise one-way system for customers. Larger suppliers turn in the yard area and are directed out against the one-way flow. Current system will not be able to be maintained and two existing external fire exits will be impacted.

- Proposed access from McKee Avenue will be harmful to Murdock's daily operations and future plans. Murdock's must enter into a commercial agreement with the neighbouring landowner for access and parking that is functional and appropriate. The cost of this will need to be included in the compensation afforded to those impacted by Luas Finglas.
- Rear access will mean that the existing warehouse will need to be entirely reconfigured, with retail area to the front and building material storage to the rear being reversed. Compensation afforded will need to take account of this required change.
- Disruption caused by proposed works will have a detrimental impact on Murdock's business operations - there will be slower turnaround times for deliveries and collections and an increased likelihood of customers seeking alternative suppliers.
- Murdocks will be able to design their own new entrance to the site and a small car parking area - request that the access route is substantially minimised to allow Murdocks to continue to operate.
- Requests that new access road only runs up to boundary of neighbouring property (Manhattan Peanuts Ltd.). It will therefore be Murdocks and their neighbour's prerogative as to what form the access route takes from there.
- Access road as depicted in the Railway Order does not align with that contained within the Jamestown Masterplan.
- Requests that condition is attached to the Railway Order instructing the developer that the proposed road from McKee Avenue is built and in operation prior to the St. Margaret's front access being removed.
- No phasing plans were submitted as part of the Railway Order and therefore the sequencing of construction of Luas Finglas is unknown. Lack of detailed design and mitigation measures showing how the businesses to operate would render the proposal premature at this juncture.
- EIAR is incomplete due to the lack of proper information regarding how the proposed design correlates with the adopted Jamestown Masterplan.

8.31. **Niamh Mooney & Darren Hanlon, Ravens Court**

- Concerned about blind spot for Luas drivers and those trying to leave Raven's Court. Blind spot should be a strong feature within the EIAR.
- Risk posed to young children by construction and operation is high, even at low speeds. Proper barriers and warning essential to avoid accidents.
- Also concerned about emergency access, deliveries, landscape and visual amenity impacts, loss of greenspace, noise and vibration, and lack of information.
- Considers that alternative route should be taken along Finglas Road or Ratoath Road and onto Cappagh Road.

8.32. **Paul McAuliffe TD, Leinster House**

- Very supportive of Luas Finglas, which will be transformative for the Finglas area. Hopefully the project can be brought forward to an earlier construction date.
- Welcomes proposals not to open pedestrian access from Lakeglen.
- There is an opportunity for an all weather pitch to be built at Farnham pitches. It is important that safe crossing points for pedestrians are provided at the alignment and Farnham Drive to facilitate access for Erin's Isle GAA Club.
- Issues raised by residents from Ravens Court on access, removal of greenspace and parking. Operational noise from Luas will also be an issue for both Ravens Court and Cardiff Castle Road.
- Concerns raised with respect to loss of parking and lack of clarity around temporary possession at Finglas Youth Resource Centre.
- Project is a great opportunity to redesign Mellowes Park in conjunction with the Parks Department of Dublin City Council and residents.
- Area around St. Margaret's Road stop should be pedestrian friendly and residents should be consulted before any major changes take place. Concerns remain about the potential noise from the substation given its proximity to local houses.

- Provision for parking for residents at the back of St. Margaret’s Court remains unresolved.
- There is no mention of pedestrian improvements from Jamestown Road to St. Margaret's stop or the Charlestown stop to allow access from Jamestown Road.
- Connectivity should be examined in future years when the Metrolink project is operational.

8.33. **Rory Hearne TD, Leinster House**

- Strongly supports the extension of the Luas green line to Finglas. Delivery of this public transport infrastructure is essential to benefiting the social and economic interests of Finglas and serves as a major opportunity for the area's regeneration.
- It is important that stakeholders engage with residents of St. Margaret's Court in relation to parking spaces. There are concerns about the lack of parking and the potential for Luas to exacerbate the problem.
- Green space should be retained within St. Margaret's Court or provided elsewhere in the cul de sac.
- Residents querying what will be done in relation to noise from trams operating in such close proximity to their homes in St. Margaret’s Court.
- Refers to issues raised by residents of Ravens Court regarding loss of green space, passing trams and danger for children, lack of parking, access for emergency vehicles, noise and disruption.
- Finglas Youth Resource Centre is concerned about disruption to its services from removal of car parking, access to the building, possibility of relocating or ceasing operations, impact of construction works on young people, proposals to mitigate noise, and enhanced security features.
- Many people in the area have expressed disappointment about the omission of Ballymun from the green line extension - this is a missed opportunity to link the green line to Metrolink.

8.34. **Susan Coughlan, Ravens Court**

- Not against Luas but has similar concerns relating to car parking, loss of green space, noise, safety, deliveries, emergency access, refuse collection, and obstruction.

8.35. **Tempside Ltd., trading as Polonez Finglas, c/o Sudway & Company Ltd.**

- Request an oral hearing.
- As part of the lease, observer has use of the car parking to the front of the shop for customers and deliveries and has access to St. Margaret's Road.
- Under the proposed scheme access to St. Margaret's Road will be removed and replaced with access to the rear from Jamestown Industrial Estate.
- EIAR does not include any traffic movement surveys indicating how delivery trucks would access observer's premises. There also does not appear to be any detailed design drawings of the new road.
- There appears to be no pedestrian access to the observer's premises and no consideration of the effect of the temporary acquisition on business viability.
- It would seem premature for the Board to grant approval for this scheme in the absence of a detailed analysis of the impact on the property. Scheme, as proposed, is not fully designed and CPO of observer's interest in the lands would constitute a breach of their constitutional rights.

8.36. **The National Graves Association, c/o Liam Ó'Culbáird**

- Association looks after monuments and graves of patriot dead through a network of volunteer associate members throughout Ireland and further afield.
- Statue and memorial garden to Liam Mellows are important assets in the cultural wealth of the Finglas area and every effort needs to be made to safeguard these assets for future generations.
- Fully support the Luas project and recognise the benefit it will bring to the people of Finglas and Dublin. Opportunity now exists to enhance and further protect the Liam Mellows Memorial Garden.

- Concerned at the proposed temporary acquisition which includes the entire area of the memorial garden. Seeks clarification as to whether the garden would be closed to the public; how long the temporary possession would be for; the intended use of the area if temporarily acquired; confirmation that the statue and plinth will not be removed from the site; and confirmation that the statue, flagpole and other fixtures would be adequately protected if the area is temporarily acquired.
- Proposed pedestrian path should not extend eastwards from behind the Liam Mellows statue towards the N2. There is adequate public access from Casement Road to the N2 via the footpaths proposed on both sides of the road that leads from Casement Road to the location of the existing roundabout. Existing Liam Mellows Park path could be extended from Barry Avenue/ Casement Road towards N2.
- Removal of proposed path to the east would deter potential vandalism, littering and general antisocial behaviour.
- Incline on existing paths surrounding the memorial garden is quite steep and can be dangerous during winter.

8.37. **Sport Ireland (SI), Connolly Hospital Blanchardstown, and Technological University Dublin – Blanchardstown Campus, c/o Transport Insights**

- Welcomes planned Luas green line extension to Finglas, which has potential to enhance Sport Ireland's lands in North Blanchardstown via improved transfer connections and further expansion of the light rail network in the form of Luas Tyrrelstown.
- Collectively, observers' operation's in North Blanchardstown generate substantial travel demand, with further expansion of their facilities planned. This is not reflected by the quality of available public transport in the area.
- Current design of Luas Finglas does not appear to recognise and reflect the importance of convenient intermodal transfers, with the existing set down facilities at Broombridge being lost without replacement and no seamless bus/ Luas transfer facilities being provided elsewhere along the route.

- Tie in opportunities between Luas Finglas and Luas Tyrrelstown do not appear to have been considered in the design.
- Expedited delivery of Luas Finglas is supported but this should not delay delivery of Luas Tyrrelstown.
- Westbound bus stops at Finglas Village tram stop is c. 60m to the west and c. 80m to the east - seamless door to door transfer opportunity is therefore not being exploited. 2 no. westbound bus stops should be replaced with a single stop opposite the Luas stop on Mellowes Road and appropriate pedestrian crossing provided.
- Capacity at bus stops in Finglas Village should be increased so that shuttle buses to the SI campus and/ or other locations in North Blanchardstown can be accommodated.
- Luas Finglas integration with scheduled orbital bus service N4 and shuttle bus services along the alignment should be further considered and accommodated.
- Broombridge bus, rail and Luas hub provides opportunities for rapid shuttle bus services to the SI campus on event days.
- Proposed bus stop arrangement at Broombridge will not offer capacity for shuttle buses or additional regular services - should be redesigned as a less compact bus hub. Relocation of bus terminus further3 east into car parking area would minimise distance between public transport. Any temporary bus stop arrangement during construction should provide extra capacity to enable use by shuttle bus services. Also concerned about loss of set down facilities at Broombridge.
- Proposed P&R facility will feature no bus transfer facilities. Alternatively, connectivity between the proposed P&R building and the St. Margaret's Road/ McKee Avenue junction (bus/ Luas stops) could be improved by providing a more direct pedestrian route via the supermarket site. Stop capacity should also be increased for shuttle services.
- Luas Tyrrelstown will have a transformation of impact on the accessibility of multiple existing trip destinations and future strategic development areas

including Dublin Enterprise Zone, TUD Blanchardstown Campus, SI Campus, Connolly Hospital, and Dunsink Land Reserve.

- Future public transport travel demand within catchment of Luas Tyrrelstown is conservatively estimated at c. 54,000 one-way trips per day.
- High level tie-in study should be completed for the Tyrrelstown spur as part of the Luas Finglas design process, e.g. tie in location north of River Tolka or alternatively between Ballyboggan Road and the River Tolka.

8.38. **Tricia Everitt & Tony Jones, St. Margaret's Court**

- Residents of 1-4 St. Margaret's Court not objecting to the application but have been left out of consultations - these houses will be directly impacted through CPO.
- There will be loss of secure parking within the boundaries of the properties; loss of capability for residents to have CCTV on their own properties; and safety concerns in relation to persons and properties.
- Additional parking space should be provided for visitors, as well as pedestrian access, disabled parking, boundary treatment, ducting for future electric charging, CCTV and provision of electric gates or bollards to new parking area.

8.39. **Turlough Hamill & Michael Cosgrove, c/o Sudway & Company Ltd.**

- Requests oral hearing.
- Property leased to Square Fit Ltd. and Alliance Automotive and is currently accessed from St. Margeret's Road for customers, staff and deliveries.
- There is no detailed design drawing indicating how the property is to be accessed.
- No traffic management study has been done to show how large vehicles will be able to use the access for deliveries and how pedestrians will be accommodated in the layout.

- There is not enough space to create a road wide enough, and the amount of traffic that would have to be accommodated on this new road has not been analysed as part of the EIAR.
- Proposed scheme not aligned with Jamestown Masterplan, which indicates that there would be no access road through the adjacent site and there would be access from St. Margaret's Court.
- It would be premature for the Board to grant approval for the scheme in the absence of detailed analysis of the impacts on the property in the EIAR. Scheme is not fully designed and to allow the CPO of the lands would constitute a breach of observer's constitutional right.

8.40. **Voice of Vision Impairment (VVI), c/o Robert Sinnott**

- Ireland's only 'Disabled Persons' Representative Organisation specialising in the human rights of blind and partially sighted people. Independent access to our built environment is a human right under the Convention on Human Rights.
- Accessible documentation was not presented to observers until three working days before the deadline for observations and this documentation is far from comprehensive, e.g. there is no description of images.
- There will be an over-reliance on operational lift at Broombridge Station with proposed removal of pedestrian access ramp. Members state that lift is out of action 50% of the time. It will be unduly difficult, if not impossible, to change from the railway station to the Luas station at Broombridge. Consideration should be given to maintaining the pedestrian access ramp from Broombridge Road down to the Irish Rail citybound platform.
- Understands that there will be no perimeter railings or walls at the Luas extension to Finglas stations and that TII will be using a differential surface between the platform and the adjoining area. It is critical that VVI have a guarantee that differential surfacing will be suitable and adequate.
- Luas platform as a large open space or plaza is extremely disorientating for independent visually impaired travellers, e.g. it is impossible to locate passenger help points.

- Observer could get no confirmation that in the absence of perimeter railing or wall that a raised bed or alternative landscaping will act as the boundary between the Luas station and the surrounding area.
- Guide dogs require a minimum of 60mm kerb height to differentiate between a carriageway and footpath. Advice Note No. 6 of DMURS recommending raised crossings and continuous footpaths has had a devasting and hazardous effect on the independence of VVI members. Dished/ dropped crossings are a superior option.
- It is reckless to allow toucan crossings where cyclists and vulnerable pedestrians share space. Toucan crossings are tantamount to shared space which is a dangerous concept according to research in Ireland and the UK.
- Since vulnerable pedestrians are supposed to be top of the road user hierarchy, there is no reason why cyclists cannot dismount at shared spaces.

9.0 Applicant's Response to Prescribed Bodies

9.1. Transport Infrastructure Ireland (TII) responded to prescribed/ public bodies as follows:

9.2. **Response to Submission from Commission for Railway Regulation**

- TII confirms that it has commenced consultation with the CRR and will formally engage under the Railway Safety Act, 2005, as amended.

9.3. **Response to Submission from Coras Iompair Éireann (CIE)**

- TII acknowledges that the compulsory purchase of railway lands is precluded by Section 130 of the Transport Act 1944.
- Discussions with CIE and Iarnród Éireann will continue and will proceed with the necessary land acquisition through a formal Bridge Agreement.

9.4. **Response to Development Applications Unit (DoHLGH)**

Archaeology

- Notes the Department's comments on Archaeological Impact Assessment and implementation of mitigation measures in relation to archaeology.
- The Project Archaeologist shall liaise with the National Monuments Service of the Department and the Planning Authority
- TII Project Archaeologist will, in consultation with the DHLGH, prepare a 'Luas Finglas Cultural Heritage Strategy'.
- Advance Targeted Test Excavations were undertaken as a component of the archaeological monitoring and excavation of utility slit trench works.
- EIAR identifies constraints (bridges, canal, tow path) to be protected by hoardings and signage during all works to prevent plant and machinery impacts. Cultural Heritage Strategy will set out the relevant archaeological or cultural heritage constraints which is required to be followed in accordance with CEMP.
- Archaeological reports will not be provided to the Planning Authority, but the results of archaeological works will be made publicly and freely available.
- It is an agreement of the Code of Practice for Archaeology that TII will provide the necessary funding to fulfil the post-excavation and reporting requirement(s) of the project to a standard that is acceptable to the Minister.

Flora & Fauna

- Measures to protect flora and fauna during the construction phase are set out in Luas Finglas EIAR.
- Avoidance, design requirements and mitigation measures are set out within the NIS and their effective implementation will ensure that any impacts on the site-specific conservation objectives of Natura 2000 sites will be avoided.
- Impact on otter - EIAR outlines mitigations to safeguard the Otter population and their protected local resting site from the proposed scheme.
- Light-bellied brent goose use of Farnham playing fields -EIAR outlines mitigations to ensure no disturbance to these SCI bird species during the construction of the proposed scheme, and minimal disruption during operation.
- Pollutants mobilised into surface water runoff during construction - TII is committed to diligently implementing the measures outlined in the EIAR, NIS and

CEMP, including Surface Water Management Plan and measures to minimise potential for pollutants to the Royal Canal and the River Tolka or the European sites downstream of these watercourses in Dublin Bay.

9.5. **Response to Dublin City Council**

- Cumulative assessment – Dart+ West has now been approved with certain modifications. These modifications do not affect the assessment already conducted from an EIA or AA perspective. New applications and projects (July 2024 – February 2025) were reviewed with the proposed scheme for cumulative impacts and it is concluded that there are no overall or combined cumulative impacts.
- TII confirms its intention to continue to maintain dialogue with the relevant DCC departments and other stakeholders during the detailed design and construction stages of the project.
- The level of detail contained in the application is appropriate for the planning stage - further dialogue is planned to refine the detailed design. Co-ordinated drawings will be developed in accordance with the permitted Railway Order design for agreement with DCC both prior to the tender of construction works.
- Details of materials and 3D visualisations will be developed in accordance with the permitted Railway Order for agreement. 3D BIM model of the entire scheme has been developed.
- Likely significant impacts of the proposed scheme on protected structures were comprehensively evaluated. Conservation methods statements will be prepared. The likely significant visual impacts of the proposed scheme on all heritage constraints are set out in the EIAR.
- Detailed road safety audit of the whole scheme for consultation with Dublin City Council will be prepared at the detailed design stage.
- Visual Impact Study will agreed prior to commencement of development.
- Detailed risk assessment of the suitability of proposed structures and their associated materials to be carried out for the operational phase will be carried out prior to commencement of development.

- Detailed risk assessment for anti social behaviour and public safety at locations along the proposed route will be carried out prior to commencement of development.
- TII support the inclusion of universal design principles, and an accessibility audit has been carried out.
- Location and proposals for public art to be provided as part of Luas Finglas will be agreed with DCC and other stakeholders. Water drinking fountains beyond the scope of the proposed scheme.
- Current level of detail provided is appropriate for use in assessments and at this stage of the planning process.
- Layout and design of utility cabinets, poles and other above ground infrastructure will be agreed during the detailed design stage and construction stages of the project. It is an objective of the proposed scheme to rationalise the amount of street furniture.
- TII will retain and/or reuse boundary treatments in accordance with the Urban Integration Report submitted as part of the EIAR.
- Proposed footpath widths will be reassessed at detailed design stage – 2m widths are generally adopted. Footpath widths take account of congregations.
- TII intend to revisit the design of cycling infrastructure to align it closer to the Cycle Design Manual 2023 and consider increasing the level of segregation between cyclists and pedestrians at detailed design stage.
- TII supports the inclusion of universal design principles - accessibility audit will inform detailed design phase.
- Further information on the public realm improvements will be provided at detailed design stage.
- Further details will be provided a detailed design stage of Broombridge station and Luas stop, including matters around access to the tow path, risk assessments and anti-social behaviour. Trees in footpath to south of bicycle store will have paved tree grills to maximise circulation space.

- Better public use of the space at St. Helena's stop will increase passive surveillance – TII supports further development of these spaces for community use.
- Cycle track not being provided through Cardiff Castle Road, which is consistent with the Greater Dublin Area Cycling Network Plan (2022) - road is narrow and there is low speed/ low traffic volumes.
- TII agrees to continued engagement at detail design stage for Finglas substation, Luas stop and surrounding environment in order to mitigate any perceived security concerns.
- St. Margaret's stop – vehicular access required to east of stop. Signalised junction to the north will be in accordance with Cycle Design Manual. Bus stop to the north will still allow for 3m boarding/ alighting area.
- Apparent doubling up of cycle track at Charlestown Place junction allows cyclists to turn left to bypass traffic signal. TII accepts that existing cycle track and footpath where the proposed scheme ties into are quite narrow at this point.
- Areas within the boundary of the swept path of the Luas will be permanently acquired in order to secure the alignment and ensure operational continuity. Other areas will be transferred or will revert back to public ownership.
- TII intends to provide electric charging at the proposed park and ride facility on North Road and also at the redesigned car park on Mellowes Road.
- TII welcomes further discussion on the provision of mobility hubs during detailed design stage.
- There will be continued engagement with DCC on detailed design and specification of landscape materials for cycle track infrastructure and street furniture. Proposed palette of materials creates a line-wide identity.
- Conservation expert will be appointed as necessary where there is direct or indirect impact on a protected structure or built heritage constraint.
- 3D BIM model with virtual reality capabilities is available to assist in detailed design.

- Provision of gates to the parks is not possible as the access on the alignment of the tracks must remain open for the Luas at all times.
- At Luas Finglas stop there is Uisce Éireann pumping station. Appropriate security including CCTV coverage of the structure will be considered in the detail design stage.
- Location and proposals for public art under the percent for art scheme to be provided as part of Luas Finglas will be agreed with DCC and other stakeholders.
- Cycle track infrastructure aligns with the Greater Dublin Area Cycling Network Plan (2022) - rubber insert products available to reduce the risk of cyclist falls at tracks. Each of the 4 new Luas stops will include cycle parking facilities.
- Social and commercial impacts of Luas Finglas are referenced in the Population chapter of the EIAR.
- Luas will generally have priority at all road crossings and junctions will be more favourable to active travel.
- Proposed scheme design has taken sustainability and sustainable design into account and is a pilot circular economy project for TII.
- Drawings include details of tree removal and replacement, and EIAR includes planting strategies and a full arborist report.
- OHLE details to be resolved through further consultation with DCC. Further discussion on the location and design of proposed utility cabinets will take place during the detailed design stage.
- Consideration will be given to Your City Your Space - Dublin City Public Realm Strategy (2012), 2016- 2020 Dublin City Tree Strategy, and Construction Standards for Road and Street Works in Dublin City Council (2016) during detailed design.
- Boundary map has been prepared post submission showing maintenance responsibilities within red line and will be shared with DCC.
- Cycle infrastructure will be revisited at detailed design stage to align it closer to the Cycle Design Manual 2023 and in particular for bus stop locations. This will include reassessment of shared surfacing.

- Red line extents of the project is indicated on the alignment drawings.
- Proposed grass track will limit the visual and physical impact on the parkland public open space.
- Pedestrian connection from Broombridge down to the greenway on the north side of the Royal Canal is proposed to be retained.
- TII is committed to continued engagement with DCC and welcomes further discussion on the public realm at Broombridge Stop; pedestrian crossings, rest stops and public realm at Tolka Valley Park; landscape and planting design in St. Helena's; SuDS measures; swept paths; cycle parking; track level, materials etc. along the edge of the Mellows Road; quantum of essential parking required for the creche; Finglas Stop public realm; public realm design of St Margaret's stop; St. Margaret's future site for sheltered housing; public realm design at the Charlestown junction to provide a more pedestrian-focused link between the shopping centre and the Luas terminus during the detailed design stage.
- Implementation of the Greater Dublin Area Cycling Network Plan to provide cycle tracks on Farnham Drive may encourage some cyclists not to use the park.
- Corridor along Broombridge is constrained by the existing businesses on the west side of the road.
- Suggested expansion of the red line in this case is outside the scope of the proposed development.
- Adoption of a compact signalised junction will be favourable to active travel at the Finglas Road junction.
- Amending works to include undergrounding and coordination of services infrastructure at this stage is not possible.
- Discussions took place in February 2025 between TII and DCC to exchange latest design information and progress the DCC housing scheme design on Bannow Road.
- *Archaeology* - TII will ensure full compliance with the mitigation measures and monitoring procedures outlined in the EIAR.

- *Forward Planning/ Development Management* - land at the rear of St. Margarets Stop is not required for construction or operation of Luas. Service road has been preserved to allow access to the site, which would otherwise be landlocked. TII is committed to continued engagement with DCC and welcomes further discussion on the area south of the St. Margaret's Station Plaza with DCC planners during the detailed design stage.
- Proposed scheme will not compromise the integrity of the green infrastructure strategy outlined for the Jamestown Masterplan.
- TII committed to continued engagement with DCC and welcomes further discussion to ensure that the most up to date information on the Royal Canal Greenway scheme is available during the detailed design stage.
- Requirement for a landscape architect, ecologist, and an arborist is noted and agreed. Tree bonds, tree protection and tree strategy to be agreed.
- *Parks, Biodiversity & Landscape Services Division* – current level of detail appropriate for assessments.
- Luas stop at Tolka Valley Park not justified from a catchment perspective.
- Additional footpath can be considered along the park side of Casement Road at detailed design stage.
- It is possible to amend at detailed design stage to have a narrower SUDS feature and amend the above ground planting in Mellowes Park to minimise impact on active recreation.
- *Air Quality Monitoring & Noise Control Unit* – TII will consult with St. Helena's Childcare Centre to confirm noise control measures.
- Length of noise monitoring period – taken from TII document Guidelines for the Treatment of Noise and Vibration on National Roads (2004), which is for similar linear transportation development and is the only applicable national guidance. Carried out over a 24 hour period and longer for several unattended locations.
- At all locations where a comparison is possible, there is good agreement between the measured results and the EPA noise mapped results.

- There are errors in Table 5-3 Rail Noise significance ratings at Impacted Locations – Daytime 2057 but these do not alter the assessment and have no consequential interactions with other assessments.
- No applicable national guidelines or standards for the assessment of rail noise impacts. Therefore, reference has been made to other projects both within Ireland and in the UK to determine an appropriate approach. Thresholds for the proposed scheme are identical to those adopted by DART+ West and Metrolink.
- Scale of the impact will depend on the degree of noise change - if ambient noise level is currently below the threshold, then the scale of impact is dependent on the extent to which the predicted noise levels exceed the thresholds. Pre-existing baseline noise environment is often elevated in urban areas and therefore mitigating noise from the proposed scheme would not offer any noticeable benefit.
- *Drainage Planning, Policy & Development Control* - A line wide set of operation and maintenance drainage drawings are being prepared, based on principles previously discussed with DCC and TII Operations.
- DCC, FCC, Dublin City Parks Department and the Luas Operator will be responsible for the maintenance of their respective drainage systems.
- Locations of proposed and existing drainage infrastructure are indicative and final locations are to be determined during the detailed design phase.
- Integrated Constructed Wetland (ICW) will be impacted due to the loss of treatment area within Cell 1 as a result of overshadowing from the proposed bridge. To compensate for this loss, Cell 1 will be slightly extended to both the north and south - there would be no net loss in habitat within the ICW footprint. There is also an opportunity to carry out refurbishment works on other elements of the ICW.
- The proposed works will offset the lost treatment area, ensuring that the ICW is capable of providing improved passive treatment of through-flowing waters. Works will also improve access across the ICW for operations, maintenance and sampling works.

- TII confirms that discussions are ongoing with DCC regarding the ICW and long-term maintenance boundaries and responsibilities.
- *Active Travel Programme Office* - intention at detailed design stage to revisit the design of cycling infrastructure to align it closer to the Cycle Design Manual 2023, in particular in relation to bus stop facilities on Mellowes Road; warning tactile paving to warn of conflict with cyclists; bus stop facilities and the level difference between cycle track and footpath; improvement of the design and operation of crossings on Mellowes Road; and road markings at protected junctions.
- The proposals for Finglas to Killester Cycle Scheme will be reviewed at detailed design stage to tie-in safely with these active travel proposals.
- *Travel Advisory Group* - intention of the proposed scheme to provide tactile paving at pedestrian crossings as appropriate.
- Issue of stop lines directly after turns to be addressed at detailed design stage.
- Intention at detailed design stage to revisit the design of cycling infrastructure to align it closer to the Cycle Design Manual 2023 and this will include footpath/cycle track crossings
- Vehicle swept path analysis will be reviewed and Stage 2 Road Safety Audit will be carried out as part of the detailed design. Detailed design will be based on appropriate national and local authority standards.
- Public lighting locations, maintenance, electrical supply, etc. for the proposed scheme will be addressed at detailed design stage.
- *Liaison between TII and DCC* – committed to engagement throughout the duration of the project.
- TII committed to ongoing engagement in relation to handover and photographic record.
- *Road Design & Construction* - committed to engagement at detailed design in relation hard landscape materials; new access road through Jamestown Industrial Estate; design of proposed pedestrian and cyclist connectivity to and within stations; any alterations to kerbside spaces; and works that impact on bridges.

- Road Safety Audits will be carried out at appropriate stages throughout the design of each individual scheme.
- *Reinstatement and Maintenance* – DCC's comments noted and agreed. Carried out in accordance with Construction Standards for Road and Street Works in Dublin City Council.
- *Construction period* – TII refers to Construction Traffic Management Plan appended to EIAR.
- DCC's comments on removal of antique setts, infrastructure to be taken in charge, and ground anchor installations noted and agreed.
- *Air Quality* – TII will ensure full compliance with the assessment methodology, mitigation measures, and monitoring procedures.
- Commitment to carry out dust deposition, particulate monitoring (PMlO, PM2.5) and NO2 monitoring indicated in the EIAR will be carried out.
- *Noise & Vibration* - TII will ensure full compliance with the assessment methodology, mitigation measures, and monitoring procedures.
- *Community Engagement and Notification Procedures* – procedures as agreed in EIAR will be adhered to. Community Liaison Officer will be nominated.
- *Out of Hours Work Notification* - Out of hours work will require at least 4 days prior notification. The nature of the works, why the works are necessary, the duration, date and times shall be detailed.
- *Operational Phase* - Assessment methodology, mitigation measures, and monitoring procedures will be complied with, and cumulative effects of all site activities will be continuously assessed.
- TII and the design team shall work collaboratively with the Noise Mapping Bodies (NMBs) and Action Planning Authorities (APAs). Any exceedances of the Luas Finglas EIAR noise criteria shall be mitigated through the development of suitable noise mitigation measures as part of any future Noise Action Plan.
- *Drainage & Water Protection* - in keeping with Sustainable Drainage Design and Evaluation Guide 2021, the Greater Dublin Regional Code of Practice for

Drainage Works and the Greater Dublin Strategic Drainage Study (DCC). Detailed drainage design will be agreed in writing with DCC.

- Comprehensive site survey will be carried out to establish all public surface water sewers that may be on site.
- TII notes and agrees with DCC comments/ requirements on foundations and details of all affected sewers; pre- and post-construction surveys; as constructed drawings and a CCTV survey; licensing and connection procedure; groundwater discharge or any other trade effluent; basement drainage; ICW mitigation; riparian margins/ river substrate; and public and bridge lighting.
- *Lagan Road* – committed to engagement regarding safety at crossing points for cyclists and possible conflict with general traffic and/or LUAS, during the detailed design stage.
- *Broombridge* - Visibility can be reviewed at the uncontrolled pedestrian crossing near the bus stops on Broombridge Road during detailed design.
- *Tolka Valley Park* - existing park paths will form the basis for the proposed scheme. Incorporating a footpath on the proposed Tolka Valley Bridge is considered unnecessary.
- Provision of a footpath on the western side of the tracks on Broombridge Road would require additional land take and building acquisition.
- Junctions will be on the DCC SCATS signalling system which will allow for queue management.
- *St. Helena's Road opposite Montessori* - uncontrolled crossings will have at least the minimum required stopping sight distance to the back of tactile paving as per Table 4.2 of DMURS.
- *Wellmount Road* – raised table will augment existing traffic calming measures creating conditions where uncontrolled crossing is suitable. Safety at pedestrian crossing could be improved at detailed design stage.
- *Cardiff Castle Road/ Ravens Court Junction* – drivers exiting Ravens Court are not encouraged to stop across Luas tracks. Uncontrolled crossing on the bend

could be removed by not providing tactile paving / dished kerbs. Can be reviewed at detailed design stage.

- *St. Margaret's Road/ McKee Avenue* – Level of detail provided for bus stop is appropriate for assessment. Further engagement at detailed design stage regarding the positioning of bus stops.
- *St Margaret's Road/McKelvey Road junction* – Pedestrian/ cyclist conflict addressed by way of toucan crossing. Happy to engage in further discussion regarding the form of this crossing during the detailed design stage.
- *St Margaret's Road/ESBN private road junction* – Bus stop overhanging junction opposite will only cause momentary obstruction. Uncontrolled pedestrian crossing is proposed to cater for strong anticipated pedestrian desire line. Buses at stop blocking visibility would only be momentary. Controlled crossing not possible at this location.
- *Removal of footbridge* - required due to clash with Luas OHLE. Staggered crossing to be provided for safety reasons, with the aim of providing single continuous crossing as much as possible.
- If length of yellow box is excessive, there is a greater risk of non-compliance by drivers. Traffic lingering beyond stop line can be flushed out by extending the inter-green period. Luas Finglas is compatible with BusConnects and TII can comply with 15-20m bus stop location requirement. Road markings on the proposed scheme to be as per the Traffic Sign Manual.
- TII confirms it is the intention at detailed design stage to revisit the design of cycling infrastructure to align it closer to the Cycle Design Manual 2023, in particular in relation to tactile paving.
- Vehicle Swept Path Analysis has been used to inform the preliminary design. This will be reviewed as part of the detailed design process. Stage 2 Road Safety Audit will be carried out as part of the detailed design.
- Detailed design will be based on appropriate national and local authority standards including but not limited to Construction Standards for Road and Street Works in Dublin City Council, Traffic Signs Manual (Government of Ireland), Design Manual for Urban Road and Streets, Cycle Design Manual.

Traffic Signals

- *Traffic signals drawings* - current level of detail provided is appropriate for use in the assessments and at this stage of the planning process. Dialogue will continue at detailed design stage.
- All pedestrian/cycle crossings of the Luas line will be non-signalised and there will be two non-signalised vehicular crossings at Ravens Court and the ESBN access.
- *Broombridge Station* - removed metal pedestrian ramp will not be replaced due to insufficient headroom beneath the new overbridge. Bridge deck of the existing bridge will also be raised for Dart+ project.
- *Lagan Road – new signalised junction* – no pedestrian crossing on third arm as there is no frontage activity on the west side of Broombridge Road. Stop lines are required to be set back to accommodate swept-path requirements. Two new induction loops would also be installed.
- *Ballyboggan Road* - junction has been made as compact as possible and moderate traffic volumes will ensure that congestion is kept to acceptable levels.
- Advanced cycle stop lines (ASL) at this junction and south-bound stop line for cyclists – will be revisited at detailed design stage. Eastbound cyclists will be given a pre-signal to allow them to clear the junction ahead of traffic from Broombridge Road. ASL at Tolka Valley junction will also be revisited at detailed design stage.
- *St. Helena's Road* – simple junction that can operate with three stages and pedestrian crossing will only proceed if called.
- *Wellmount Road* - TII committed to continued engagement with DCC on whether or not this junction should be signalised; how pedestrian facilities can be improved; and how cycle track provision can be improved. Traffic modelling did not indicate that this junction required signalisation.
- *Mellows Road area* - proposed Ravens Court estate boundaries have been positioned to provide at least the minimum sight distance requirements.

- *R135 - St Margaret's Road* - traffic modelling indicated that congestion would be within acceptable thresholds. Cycle infrastructure will be revisited at detailed design to align closer with Cycle Design Manual.
- *St Margaret's Road- McKee Avenue* – TII will revisit the design of cycling infrastructure to align it closer to the Cycle Design Manual 2023.
- *McKelvey Road junction* - Stop lines are required to be set back to accommodate swept-path requirements for articulated HGVs.
- *St Margaret's Road/ McKelvey Avenue* - both the bus stop and pedestrian crossing are ideally placed to serve the residents of McKelvey Avenue.
- *Charlestown Place - St Margaret's Road* - Traffic modelling indicated that congestion at this junction would be within acceptable limits.
- Design and size of protected islands at junction will be revisited to align closer with Cycle Design Manual.

Conservation Section

- TII is committed to further engagement with DCC Conservation Section, and welcome further discussion in relation to cultural heritage constraints.
- Six Protected Structures are located within the vicinity of the proposed route - Broombridge (RPS 909), Finglaswood Bridge (RPS 906), St. Helena's House (RPS 7575), King William's Ramparts, Southern Section (RPS 8733), St. Patrick's Well (RPS 8735) and King William's Ramparts, Northern Section (RPS 8734) – Impacts assessed in EIAR. Other protected structures in the wider area were descoped.
- Red hatch conservation areas at Royal Canal, the Tolka Valley and three areas within Finglas Village – assessed in EIAR.
- NIAH entries in the vicinity – assessed in EIAR.
- Archaeological entries including the site of 16th/17th manor house (DU014-066005), 17th century house (DU014-066003), Ritual Site - holy well (DU014-066002), North Section of King William's Ramparts (DU014- 066008), Church, Graveyard and High Cross on the site of an earlier monastery associated with St. Canice (DU014-066009, DU014-066017, DU014-066010) – assessed in EIAR.

- Dublin City Industrial Heritage Records (DCIHR) at the Royal Canal, Broom Bridge, Finglaswood Bridge, and Broombridge (RPS 909, NIAH Reg. No. 50060126) assessed within EIAR.
- Written, drawn and photographic record of the setting of the historic bridges and canal walls will be prepared by a suitably qualified person with expertise in architectural conservation prior to construction.
- Photomontage locations were agreed between LVIA and Cultural Heritage specialists in consultation with Dublin City Council. BIM model, and associated flythrough animations will play a more important role in capturing these visualisations from a range of perspectives.
- TII committed to further engagement with DCC and will liaise with the Conservation Section in relation to the existing security railing near St Helena's House during the detailed design and construction stage. There is an error in the extent of noise barrier at this location.
- TII is continuing liaising closely with Irish Rail, DCC and Waterways Ireland regarding the impacts to the existing bridges. TII does not agree to the proposal that the Luas works should not proceed in advance of or be dependent on works by others.
- Notes and agrees with comments relating to best conservation practice, conservation expertise, discovery of unrecorded architectural heritage, and repair and retaining maximum amount of historic fabric.

9.6. **Response to Fingal County Council**

- TII welcomes the general submission of Fingal County Council confirming its full support for Luas Finglas. Welcomes the potential of the Council to utilise Section 48 & 49 to generate financial contributions. Luas Finglas will contribute significantly to the future redevelopment of areas along its corridor. TII will engage will FCC & DCC in respect of establishment of a potential supplementary contributions scheme.
- Existing and proposed bus services at Charlestown and St. Margaret's Road are included as part of the proposed scheme.

- Notes that FCC is available to meet with TII and its project team to consider how the transport scheme can be delivered while improving quality for buses, pedestrians and cycles and maintain movement for other vehicles.
- Sheffield stands are proposed at two locations adjacent to Charlestown and secure internal parking is proposed at the St. Margaret's stop (multi-storey park & ride).
- Community gain – Luas Finglas will contribute significantly to the future redevelopment of areas along its corridor and will bring about transformative change for residents, commuters, and visitors within the area from a social, economic and environmental perspective.
- Updated planning history search concluded that there are no overall or combined cumulative impact with Luas Finglas.
- *Conditions* – CEMP, CTMP and C&D RWMP prepared for the proposed scheme. C&D RWMP shall be produced by the construction contractor in accordance with the 'Best Practice Guidelines on the Preparation of Resource and Waste Management Plans for Construction and Demolition Projects' (EPA, 2021).
- Standard working hours from 07:00hrs to 19:00hrs on weekdays (excluding Bank and Public Holidays) and from 07:00hrs to 13:00hrs on Saturdays. Noise and Vibration Management Plan has been prepared within the CEMP.
- CTMP outlines measures to reduce the impact on road condition - roads being used for dedicated construction vehicle access routes shall be regularly inspected for cleanliness.
- TII committed to working closely with the various utilities stakeholders to reduce the overall visual clutter of cables and poles.
- Impact on surface water have been robustly assessed in EIAR - proposed scheme includes comprehensive mitigation measures to manage surface water effectively, ensuring public health and environmental protection. Surface Water Management Plan has been prepared along with the CEMP.

- Subject scheme is in itself a form of public infrastructure and facilities that will benefit the area and can be funded under development contributions as opposed to a form of development on which contributions are levied.

9.7. Response to NTA

- Luas Team remains committed to ensuring that, where feasible, the proposed Scheme enhances cycling connectivity and aligns with the objectives of the GDA Cycle Network Plan. TII will contribute meaningfully to improving cycling infrastructure, facilitating modal shift, and promoting LRT-cycle integration.
- Cycling facilities will be reviewed and amended as necessary during the Detailed Design stage to ensure full compliance with the latest requirements of the Cycle Design Manual – a condition attached to the Railway Order in this regard is acceptable.
- TII will continue to liaise with the NTA BusConnects Ballymun/Finglas to City Centre Core Bus Corridor Scheme Luas Team, and any condition attached to the Railway Order requiring such coordination is acceptable and will be implemented.

9.8. Response to Uisce Éireann

- Water and wastewater connections will be organised by the appointed contractor via locally available connection points agreed by the contractor with service providers.
- All necessary precautions will be rigorously implemented to prevent any impacts on public drinking water sources.
- Railway Order design demonstrates that all Utility Service Providers assets have been fully assessed in relation to potential impact of the proposed Luas alignment.
- Detailed design is developed with as few derogations as possible, presenting a compliant, constructable, operational and maintainable network of services.

- Derogations and alternative options will be agreed if needed, ensuring that Uisce Éireann's assets and services are uninterrupted in their operation and maintenance insofar as practicable.
- TII agrees to engage with Uisce Éireann in relation to proposed diversions and the impact that they may have on access and maintenance. Uisce Éireann requirements will be incorporated and, where possible, TII will ensure that Uisce Éireann's assets and services are uninterrupted in their operation and maintenance.
- With certain services where the required clearances would not be achievable, derogations would be sought. TII intends to progress derogation agreements at the detailed design phase when there is more certainty with the developed designs.

10.0 Applicant's Response to Submissions

10.1. Transport Infrastructure Ireland (TII) submitted individual responses to each of the observations as follows:

10.2. **Applicant's Response to Submission from Adrez Ltd.**

- Acquiring the internal road owned by Adrez Ltd. is necessary for the Luas Finglas scheme, and will ensure continuous access to existing properties in Jamestown Little Industrial Estate.
- *Detailed design* - Property drawings outline the extent of land requirements for the project and are not intended to illustrate road layouts. Design and alignment of road is comprehensively presented in the alignment drawings and referenced landscape drawings. Drawings are sufficiently detailed and comprehensive to facilitate the approval process and to inform the EIA.
- *Traffic movement study* - Swept-path analysis shows that the proposed scheme will facilitate the necessary vehicle movements while improving access conditions compared to the existing situation.
- Where changes in traffic volumes as a result of the proposed scheme are less than the 100 vehicle threshold (as is the case here), then the impacts are

deemed to be not significant, and a further traffic capacity analysis is not required as part of the EIA

- *Compliance with Jamestown Masterplan* – Adrez lands are identified for future 'residential led mixed-use' having regard to their location along the Luas corridor.
- Dublin City Council, confirms that regenerative mixed use development proposals along the proposed route at, *inter alia*, Jamestown, *"have / are being developed to ensure compatibility with the project delivery and future operation"* of the Luas. Proposed development complies with the movement strategy and will deliver a local street consistent with the masterplan framework.
- Masterplan includes measures to support existing uses while facilitating envisaged masterplan change in the area – States that *"access to Polonez and Finglas Auto Parts to be provided from the north, aligned with the urban structure set out, if Luas Finglas operations prevent the continuation of access from St. Margaret's Road."*
- *Provision of new access roads* - existing access will remain in place until the new road and access are fully available for use. Construction activities and programme of works are set out in the EIAR.
- *Sufficiency of access road* - proposed scheme includes a 7m wide corridor through Jamestown Little Industrial Estate designed to accommodate necessary access requirements. It is acknowledged that turning manoeuvres for larger vehicles may be more challenging during the period of temporary land use.
- *Pedestrians* - Footpath is proposed between the new Luas tracks and the property boundary, and pedestrian access will be facilitated directly from St. Margaret's Road to the retail unit.
- *EIAR* - prepared in full compliance with the EU EIA Directive, Guidelines and the Act. Potential environmental impacts have been identified and assessed, and mitigation for these impacts has been proposed.
- *Extent of land take* – Lands to be acquired are necessary for the provision of the Luas line and associated footpath plus new access road - considered by TII to be both reasonable and proportionate. Alternative access to the premises is

facilitated by the new road arrangement making use of the current access through Jamestown Business Park and is aligned with the masterplan.

- Lands compulsorily acquired under the Railway Order are not limited just to the railway line or tracks but encompass lands which are necessary for giving effect to the Railway Order. Interference with the use of the lands is entirely proportionate to the legitimate aim being pursued by Luas Finglas, in the interests of common good.
- TII will serve Notice to Treat if Railway Order becomes operative, and those parties with interests and rights in the lands being acquired will be entitled to submit a claim for compensation.
- Consultation was extended to allow for the Christmas period to ensure that the statutory requirement for a six week consultation was met.

10.3. Response to Submission from Aldi Stores (Ireland)

- *Impact on operation of store and loss of parking* - There will be a loss of 11 parking spaces and there are 171 existing spaces serving the supermarket and retail units.
- Planning permission has been granted for the redevelopment of the site showing a total of 154 parking spaces (ABP-313917-22), none of which are impacted by the proposed scheme.
- Nearby Luas stop segregated cycle tracks will improve overall access to the premises in the long term, thereby reducing requirement for parking.
- Access from St. Margaret's Road to Aldi will be maintained throughout construction and advanced public consultation and stakeholder engagement will reduce significance of traffic management arrangements on access to businesses. Notification to stakeholders will detail estimated duration of works, working hours and the nature of the works. A Community Engagement Plan will be developed to encompass the construction and operational phases.
- *Impact of accessibility* - continuity of access will be maintained throughout construction and details regarding temporary access will be discussed prior to

construction starting. Entrance does not need to be relocated – 16.48m articulated HGV will be able to use entrance with careful manoeuvring.

- Planning permission would not be required for minor pavement works, removal of parking bays and road markings.
- Expected overall construction programme for main works is 3.5 years - construction works directly impacting on Aldi will be shorter.
- TII confirms their intention to engage with stakeholders during detailed design and construction stages.
- Compensation is not a factor in the assessment of impacts nor the mitigation thereof for the purposes of EIA to be conducted by the Board. TII has published a CPO guide and Land Acquisition Strategy.
- Proposed temporary works areas at Aldi are needed to allow for construction of new boundaries and access arrangements.
- Alternative arrangements for pedestrians will be facilitated on site – a safe route will be provided past the work area matching existing facilities were practicable. Contractor/ Planning Supervisor Construction Stage will be appointed to coordinate development of traffic management plan.
- Significance of impacts on the finished scheme are considered slight or moderate as the property can continue to operate with minimal impact on its character.
- Temporary crossing facilities are to be maintained across St. Margaret's Road at the McKee Avenue Junction throughout construction. Utility supplies will be maintained throughout construction.
- Proposed land takes both permanent and temporary are proportionate and necessary for the road widening due to the insertion of the Luas alignment and the associated upgrades to the footpaths and landscaping.
- Where possible alternative temporary parking will be arranged and TII is committed to ongoing engagement with stakeholders during the detailed design and construction stages regarding this issue.

- Phased lane closures will be required for the works and some limited road closures, which are intended to be undertaken at night works to reduce disruption.
- Preliminary analysis of swept path and site access designs have been taken into account and are illustrated on the alignment and landscape drawings.

10.4. Response to Submission from An Post

- TII note the significant knock on effects on An Post's ability to meet public postal needs.
- Vehicular and pedestrian access to An Post facilities will be maintained throughout the duration of the works.
- Works will be carried out in accordance with the Construction Traffic Management Plan.
- Any road closures will be minimised and scheduled as night works to reduce disruption.
- Details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area.
- An Post will be consulted regarding any planned access restrictions, and the opportunity to engage will be availed of throughout the process.

10.5. Response to Submission from Appian Holdings (Mongey Plunkett Motors)

- Existing vehicular and pedestrian access to the business will be maintained for the duration of the works. Proposed permanent works on North Road are not expected to extend to the property in question.
- Phased lane closures will be required for the works along North Road and businesses will be informed in advance of works.
- There will be a reduction in traffic volumes along North Road as a result of the proposed scheme due to modal shift to sustainable travel; localised traffic redistribution; and the nature of the park and ride to capture traffic which would normally use North Road and transfer them onto Luas.

- Proposed development will not directly or indirectly compromise the daily operation of the existing commercial business - business is outside the development boundary and proposed scheme will improve accessibility.
- Right of way along the eastern and southern boundaries of the Joe Duffy car dealership is not used for accessing the premises referred to and has no links to the road. Existing rights of way as referred to are to be extinguished by acquisition to facilitate construction and operation of the park and ride.
- Park and ride is a permissible use under the Z6 – Employment/ Enterprise zoning objective. It is recognised that uses in this zone generate a considerable amount of traffic and therefore good vehicular and public transport access is required. Luas Finglas will deliver the public transport requirement.
- Loss of private rights of way - entitlement to submit claim for compensation. TII understands the importance for property owners to be able to plan their affairs with this much notice as possible.

10.6. **Response to Atlas Autoservice Ltd.**

- Loss of parking - once the land is returned, it leaves the potential to reinstate most car parking.
- High level of site management and agreement has been identified to mitigate disruption. CEMP sets out management framework for the delivery of the proposed construction works and illustrates how the proposed scheme could be delivered in a logical, sensible, and safe sequence with the incorporation of specific environmental commitments.
- Permanent land take line is set back in the order of 700mm to 1m behind the current property boundary line (back of footpath / bollards). The back of the proposed footpath will coincide with the permanent land take line.

10.7. **Response to Brooks Timber & Building Supplies Ltd.**

- Impact on daily operations - will be entitled to submit a claim for compensation. CPO guide and Land Acquisition Strategy will be published by TII.

- Proposed permanent and temporary land takes at this location are proportionate and necessary for the road widening due to the insertion of the Luas alignment and the associated upgrades to the footpaths, cycleways, roads and landscaping.
- TII acknowledges that a change to the current circulation and access arrangement is required. TII does not agree with the contention that this could result in reduced attractiveness for existing/potential customers.
- Compensation is not a factor in the assessment of impacts nor the mitigation thereof for the purposes of the EIA to be conducted by the Board.
- The impacts on access will result in a change in how stock is delivered and how customers collect purchases. There will not be an increased risk of collisions in this low speed/ low volume environment and changing to 2-way system will make no difference to safety.
- Personnel for traffic management of articulated HGV deliveries may be required to the north side of the site. 10m or 7.2m HGVs have a greater ability to turn and are less likely to require supervision.
- Legal & financial implications - Land take is pursuant to section 45(1) of the Transport (Railway Infrastructure) Act 2001 (as amended), and the RO shall have effect as if it were a compulsory purchase order referred to in section 10(1) of the Local Government (No.2) Act 1960 (inserted by Section 86 of the Housing Act 1966), which has been duly made and confirmed with necessary modifications. Accordingly, TII is authorised to serve a Notice to Treat pursuant to the provisions of the Housing Act, 1966 (as amended), including Section 79 thereof. In default of agreement for compensation, this will be determined by a Property Arbitrator in accordance with the relevant statutory provisions namely, the Acquisition of Land (Assessment of Compensation) Act 1919 as amended and extended by section 69 and the Fourth Schedule of the Local Government (Planning and Development) Act 1963 and section 48 of the Planning and Development (Strategic Infrastructure) Act 2006.
- Proposed scheme has been designed to minimise as far as possible impacts on existing occupied premises on either side of the alignment.

- Proposed scheme not precluded under zoning objectives. It will contribute positively to the realisation of development aspirations for the area and maximise access to public transport connections to serve the needs of existing and future employees in the area.
- Policy SMT22 seeks to support the expeditious delivery of key sustainable transport projects, including delivery of Luas to Finglas.
- TII confirms intention to continued engagement with the stakeholder during the detailed design and construction stages. TII has previously engaged directly with business owners to explore alternative access arrangements.
- Use of the building can continue with modifications to the circulation, storage and access.
- Design and construct nature of the project - nature of the contract type has no bearing on the of impacts.
- Documents submitted with the application comply with all legal requirements including under the EIA Directive and the Transport (Railway Infrastructure) Act 2001 (as amended). Drawings are sufficiently detailed for the likely significant effects on the environment to be considered and assessed.
- Railway Order and drawings clearly identifies all the lands and rights in lands required for the construction and operation of Luas Finglas. Level of design provided is intended to facilitate the planning process and inform the EIAR. A general description of construction activities and methodologies, along with the procurement strategy and limits of deviation are set out in the EIAR.
- Proposed scheme will also have a positive effect on the business by increasing people familiarity with its location.
- Temporary land take is required for construction of new boundary treatment, landscaping and utility services relocation which are all detailed in the alignment, utilities and landscape drawings and EIAR.

10.8. **Response to Cllr. Mary Callaghan**

- There has been engagement throughout the process with residents who may be affected by the construction and/or operation of Luas Finglas. Engagement will continue.
- Option chosen for St. Margaret's Court would allow improved accessibility to secure parking; enhanced green space and landscaping compared to the alternatives; and the number of car parking spaces will increase from 24 to 32. Proposed solution offers an overall increase in greenspace available to the residents along with additional/relocated car parking and new landscaping works.
- Increase in noise at St. Margaret's Court for both the average and peak hour of day or night-time operation is slight as the overall noise increase is less than or equal to 1dB above baseline - therefore, no mitigation is required at this location.
- Loss of green space in Ravens Court is assessed as slight, permanent and negative - comprehensive landscape plan will be prepared and agreed with residents as part of detailed design.
- Scheme has been designed to ensure that both drivers exiting Ravens Court and pedestrians crossing the Luas line have appropriate visibility in accordance with relevant design standards.
- Proposed scheme does not impact existing residents parking in Ravens Court – there will be some loss of on-street parking at the entrance to the estate.
- Access will be maintained for emergency vehicles along the proposed Scheme, throughout the Construction Phase. Trams are expected to yield to emergency vehicles during operational phase.
- Comparison of future operational noise of Luas to the existing baseline, is that the increase in noise within Ravens Court for both the average and peak hour of night-time operation is slight as the overall noise increase is in the range of 1.1 to 1.8dB above baseline.
- Loss of public parking is needed to facilitate the Luas alignment and Finglas Village stop – Luas will provide an alternative to the car in the longer term.

- There will be no requirement for Finglas Youth Resource Centre to close and access will be maintained at all times. Proposed works include reconfiguration of the car park for the childcare/resources/sports centre in this area. A public right of way is to be maintained throughout construction and temporary alternative parking will be provided. External area will need to be temporarily closed for a short period to facilitate adjustments to the boundary wall.
- All relevant Irish and EU safety legislation will be complied with at all times – Health and Safety Plan will be formulated in accordance with Regulations.
- Luas will operate at a low speed in the vicinity of the Finglas village stop, which will be located in a safer car free environment with greater footfall. Luas will greatly improve the centre's accessibility and strengthen its ability to cater for young people.
- New noise from Luas operation adjacent to Finglas Counselling Services will be several orders of magnitude lower than the existing baseline noise environment due to road traffic. Residual noise and vibration impact of both the operation and construction is not significant and sound insulation measures to buildings along the proposed scheme are therefore not required.
- The use of hoarding at the resource centre and the short-term re-routing of access within a small area may be required. Measures will also be taken to ensure the continued safe and convenient access of persons with disabilities.
- There is currently no policy supporting the extension of the green line to Ballymun or Metrolink and this is beyond the scope of this application.

10.9. **Response to Colorman (Ireland) Ltd.**

- Proposed access solution from Broombridge Road beneath the proposed bridge was the result of constructive on-site engagement with Colorman. Design of the alignment and road in this location has to take cognisance of geometric constraints and the relative positions of the proposed new bridge and existing rail/canal bridge (a historic structure), the new road alignment and configuration.
- Provision of alternative access to the south is aligned with Colorman's main east-west running internal access road, thereby facilitating daily operations at the site.

Centrally located new access presents more opportunities than disadvantages for the future development capacity of the site. Scheme will also create a 13m long paved access between Broombridge Road and the proposed boundary for Colorman underneath the Luas line, with associated benefits for those entering and leaving the property.

- Temporary lands indicated further south of the bridge structure will not be required continuously and this will allow access to be maintained throughout construction.
- Permanent land take within Colorman's boundary is less than 7% and temporary land take is 7%. Not considered by TII to be significant.
- EIAR has taken into account the operational requirements of Colorman at both construction and operation stage and TII is firmly of the opinion that the impacts have been mitigated to allow the business to continue functioning at this location.
- Access to the Colourman site will be maintained during construction through phasing or construction works so as to first complete the demolition works, and road alignment works outside the existing roads. More space can then be provided to facilitate construction works and traffic lanes can be shifted to a new space.
- Works along Broombridge Road are estimated to be undertaken in the initial 18 months of the programme. Permanent access will be facilitated toward the end of this programme and temporary access will be facilitated as necessary.
- Drawings illustrate the proposed scheme for the approval process and to inform the EIAR are sufficiently detailed and comprehensive.
- Cumulative effects of the adjacent Dart + project have been considered and close coordination between both projects will ensure impacts are minimised.
- Revised internal layout for Colorman will make the frontage car park area less busy compared to the existing situation - there are currently considerable mixed private car parking / commercial vehicle scenarios throughout the Colorman site.

- Some limited road closures are required to facilitate road pavement works and construction of Tolka Valley River Bridge and to facilitate material deliveries - these will be undertaken as overnight works to reduce disruption.
- Boundary treatment will provide at least the current level of security for the site, subject to detailed design and subsequent landowner consultation.
- Proposal will offer people travelling to the Broombridge Road area alternative ways to do so and encourage a modal shift away from car dependency.
- Temporary working areas within the Colorman site are required to facilitate the construction of the permanent works.
- The Colorman site is quite large and has extensive areas of paved surfaces, such as to the rear of the site, that have the potential to be used for parking.
- Construction or operational phases of the Luas Finglas development will not compromise the on-going employment use of the 2.41-hectare site subject to the adoption of effective transport mitigation measures.
- TII does not accept that a site-specific traffic assessment demonstrating how this access will allow the business to operate, is required at this stage.

10.10. **Response to Dessie Ellis TD**

- Access and parking at Civic Offices, FYRC and Finglas Leisure Centre – as per responses above (improved public transport and cycle connections, attractive car free plaza). Loss of parking will be partly compensated by new parking to the rear of the building were safer access can be provided from Cardiff Castle Road.
- Irish and EU safety legislation will be complied with at all times and Health and Safety Plan will be formulated by the Project Supervisor Design Process (PSDP) and Project Supervisor Construction Stage (PSCS).
- Temporary alternative parking will be provided for people with disabilities and parents delivering children to Finglas Childcare / Mellow Spring Childcare Centre. Consideration will also be given to the car parking needs of employees of FYRC.
- The Luas Stop will have standard safety attributes and procedures common to all Luas stations in the city.

10.11. Response to Downshire Propco Ltd.

- Refer to response provided to Brooks Timber and Building Supplies Ltd.

10.12. Response to Dublin Commuter Coalition

- *Removal of ramp at Broombridge Station* - Due to spatial and track parameters there is insufficient headroom for the current ramped access to remain. Iarnród Éireann also plan to modify old canal bridge to facilitate electrification of line further reducing available headroom. TII and the Luas Operator will maintain lifts to a high standard of service to ensure the lifts provide the linkage needed. Adequate set-down and disabled parking spaces will be provided at the interchange.
- *Enhancement of access to Irish Rail platforms* - selected option directs all users through the interchange plaza, utilising the existing lift and stair structure installed as part of the Luas Green Line to access inbound Iarnród Éireann services. This option is the least environmentally intrusive (EIAR).
- *Humpbacked bridge* - DART+ West Project aims to provide two-way access across Broome Bridge for buses as well as for cyclists with one-way access northbound only for all other vehicles as per existing.
- Catering for cyclists on the proposed Luas bridge over the canal / railway line would add unwarranted cost and complexity to the proposed scheme.
- Proposed design at Ballyboggan Road ties into the existing road layout: on-road eastbound cycle track and no westbound cycle track. Consideration will be given to improving junction layout for cyclists at detailed design stage.
- Further widening of new bridge across Tolka River would lead to additional loss of treatment area within Cell 1 of the ICW.
- *Width of cycle lanes within Tolka Valley Park* – TII will consult with observer and relevant stakeholders.
- *Termination of cycle track at St. Helena's* - Farnham Drive roadway will be reduced in width and traffic-calmed for pedestrian safety and to facilitate proposed future cycle tracks. Additional land take in the vicinity of Erin's Isle

playing pitches has been avoided and this area hosts several wintering bird species. Trees will also be retained.

- Cycle provision on Farnham Drive to be provided as part of the NTA network plan but will be for Dublin City Council to progress.
- *St. Margaret's/ Finglas Road Junction* - If the length of the yellow box is excessive, there is a greater risk of non-compliance by drivers.
- Staggered crossings warranted at this location due to desire lines - skewed crossing will allow pedestrians to progress quicker compared to single movement straight crossings.
- *Cycle lanes on North Road* - Casement Road identified as a more desirable possible future offline north-south cycle track.
- Cyclops junction can be considered for the Finglas Road / North Road junction at detailed design stage.
- *McKelvey Road/ St. Margarets Road* - design will be updated to align with the updated Cycle Design Manual 2023, in particular for the Jamestown Business Park junction.
- *Charlestown junction* - use of a Cyclops junction can be considered at detailed design stage.
- *Previously unused park-lands after the Tolka Valley Road* - pedestrian and cyclist thoroughfare will be located in the western section of this green area and will feature appropriate lighting to ensure the security and safety of park users.
- *Cycle lockers* - combination of secure cycle storage facilities and "Sheffield" type cycle stands are proposed at Luas stops. Cycle lockers will be considered at detailed design stage.

10.13. **Response to Fashionflo Ltd.**

- TII does not accept that the effect on business and lands would be serious or profound. Access will be maintained during construction and temporary vehicle parking will be provided.

- Current business operates with low frequency HGVs movements into and out of the site. Appropriate access arrangements have been provided to allow the business to continue to operate. HGV's will access via the gate closer to Lagan Road.
- Modal shift away from car dependency should translate to a lower requirement for parking at the Fashionflo site.
- Approximately 13% of the paved area in front of Fashionflo is being acquired.
- Luas vertical alignment elevated to facilitate an underpass access at Fashionflo would be 550m long and unjustified in terms of cost, impact on programme and environmental grounds.
- Compliance with current land use zoning – zoning map cannot be read in isolation. There is a specific policy which supports the delivery of Luas Finglas.
- TII disagrees with the contention that the new access arrangement will be complex. Car park on site is also considered a low risk environment.
- TII acknowledges that there will be less space available for HGV movements; however, proposed solution is considered to be the least impactful arrangement.
- Proposed temporary land take will be limited to the duration required in completing these specific works and will be coordinated with the stakeholder in advance.
- Does not agree that proposal will result in loss of 70% of car parking on site. Net loss of parking is 13 no. spaces, representing 38% of the existing total of 34.
- TII does not accept the assertion that the tracks will reduce visibility of the site.
- New quality surfaces for footpath and cycleway and new property boundary treatment represents a significant positive aspect of the proposed scheme in this area. Luas will also create aspects of interest in a visually poor environment.
- Compensation is not a factor in the assessment of impacts nor the mitigation thereof for the purposes of the environmental impacts assessment to be conducted by the Board.

- All of the lands and rights in lands proposed to be acquired pursuant to the Railway Order are necessary and required for the construction and operation of Luas Finglas and there is no question of these acquisition being excessive.
- Proposed scheme will provide much improved accessibility for prospective employees from the catchment to the north and interconnections with other public transport.
- Proposal to retain Luas track at-grade in front of Fashionflo to permit continued access at the existing access gate is not feasible due to vertical geometry constraints for the track alignment. Signal-controlled access is not practical as it would cause issues with Luas operations being close to the Lagan Road Luas crossing.
- Providing access through adjoining third party's property is not feasible.
- Where changes in traffic volumes are less than the 100 vehicle threshold (as is the case here), then the impacts are deemed to be “not significant”.
- Luas Finglas clearly meets the test of being clearly justified by the exigencies of the common good (Clinton v the Board (No. 2) [2007] 4 IR 701).
- Enhanced connectivity and accessibility provided by the Luas extension could increase the attractiveness of the area and the promotion of 3-4 storey developments indicates a positive outlook for future growth and investment in the area.
- Extent of land take has been minimised as far as possible while allowing sufficient space for cycle / pedestrian paths, the Luas tracks and the continued two-way function of Broombridge Road.
- Traffic control measures for Broombridge road are outlined in the Construction Traffic Management Plan. Phased lane closures and some limited road closures will be required for the works. The intention is these will be undertaken as night works to reduce disruption.
- TII held meetings/site visits with Fashionflo on 6 occasions and in addition 2 site visits by technical staff took place - TII welcomes the opportunity to provide further clarification of the Luas Finglas project with all stakeholders.

- Scope of topographic survey includes the Fashionflo frontage and north side of the site along Lagan Road. Area required at this location entails a strip of land to the back of the permanent works and is required for the construction of the boundary treatments. A strip is also required for a short period for utility connection.
- Yellow box has been provided on Lagan Road to ensure that HGV's entering the property are not blocked - detailed design can consider extending the length of the yellow box.
- TII does not accept the assertion that queuing at Lagan Road is likely to be present for extended time periods throughout the day. Traffic lights will put order on what is currently an uncontrolled junction.
- Van drivers exiting the site can utilise the opposing lane to manoeuvre and therefore cross the footpath on Lagan Road at right angles. TII disagrees that the proposed road infrastructure will contribute to increased hazard particularly to pedestrians.
- Consideration can be given to providing a wider gate opening, at detail design stage, to increase the tolerance between the turning vehicle's swept path and the access gate.
- Illustrations indicate that it is possible to manoeuvre an articulated vehicle with due care within the site, assuming that the existing ramp at the gable end of the building be moved circa 10m length east to create a level paved area from edge of building to boundary wall.
- During the design of the proposed scheme, the turning circle options at Fashionflo were examined using standard design tools and it is illustrated that a 16.48m length articulated HGV can be managed on the site.
- TII accept that certain areas of the site currently being used for storage would need to be cleared to facilitate articulated HGVs. There is potential for HGV trailer parking along the western boundary of the site.
- Urban pathway will allow direct access to the property frontage along the western boundary. It is anticipated that any future development would include appropriate setbacks which would enable this footpath to be widened.

- TII do not accept that the tracks will reduce visibility of the site. The current landscape sensitivity in this area is determined as low. The magnitude of landscape change during the operational phase is assessed as medium and the quality is positive.
- New noise at the nearest monitoring location from Luas operation will be lower than the existing baseline noise environment due to road traffic. Assessed as not significant.
- Proposal to connect an additional 4 stops north of this location offers a significant increase in catchment and as such will have a significant positive impact on the site's accessibility.

10.14. **Response to Finglas Counselling Service Board of Management**

- Main construction works will not require the relocation of the counselling service. Access will be maintained during construction, including maintaining safe entry points and minimising noise and construction-related disturbances.
- Entrance and access paths will be subject to compensation agreements with the landowner. TII will engage with stakeholders to reach agreements – any implications for the entrance and ramp to the facility can be discussed and agreed upon.
- Soundproofing - daytime noise levels due to operation of the Luas range from 48 – 49 dB LAeq,16hr, which is lower than the threshold of 55dB for daytime noise. New noise from Luas operation will be several orders of magnitude lower than the existing baseline noise environment due to road traffic at the nearest monitoring location on Mellowes Road. Floating slab track will be provided in this location to mitigate noise due to curvature of track.
- New boundary walls and fences will be provided – relocation will be agreed with landowner as part of the compensation agreements.
- Tarmac area at the back of the building for 6 no. car parking spaces – provision of new parking spaces falls outside to scope of this project. The provision of formal parking will be subject to compensation agreements with the landowner.

10.15. Response to Finglas Youth Resource Centre CLG

- Land acquisition includes car park - Finglas Sports and Leisure Centre will be more accessible to people within a larger catchment and enhancing its ability to serve as a public community facility. Combination of public transport and cycling infrastructure will be particularly beneficial to young people. Loss of parking will be partly compensated for by new parking to the rear of the building from where safer access can be provided from Cardiff Castle Road.
- There will be no requirement for the centre to close, either temporarily or permanently and access to the centre will be maintained at all times during construction. Contractor will provide temporary alternative, nearby parking.
- Public right of way will be maintained throughout construction to ensure safe access to FYRC, meaning the centre will not need to close at any stage. External area will need to be temporarily closed for a short period to facilitate adjustments to the boundary.
- Requirements of the Safety, Health and Welfare at Work Act 2005, the Safety, Health and Welfare at Work (Construction) Regulations, 2013 and other relevant Irish and EU safety legislation will be complied with at all times.
- Finglas stop will be located within a safer car free environment of a new civic plaza. The number of people alighting at the stop will provide for natural surveillance with regard to anti-social behaviour, combined with the provision of good lighting, security cameras and emergency help buttons.
- New noise from Luas operation will be several orders of magnitude lower than the existing baseline noise environment due to road traffic. The noise impact at this location is concluded to be not significant (as above). Sound insulation measures to buildings along the proposed scheme are therefore not required.

10.16. Response to Firehorn Ltd. Manhattan Peanuts Ltd.

- TII has had full regard to the daily operations and development capacity at Manhattan Peanuts Ltd.

- Access to the premises will be maintained throughout construction and alternative access will be provided prior to the existing access from St Margaret's Road being removed. No need for condition to be attached in relation to access.
- Design of Luas Finglas will inform the masterplanning of the Jamestown Lands, the urban structure of which will include a strategic pedestrian/cycle amenity link crossing the Manhattan Peanuts lands aligned with key desire lines to the proposed Luas extension forming part of the green infrastructure network
- Part of the subject lands are identified for future 'residential led mixed use' having regard to their location along the Luas corridor, with the eastern component part of earmarked public open space.
- Proposed alternative access via McKee Avenue is in line with the master plan for Jamestown Business Park. TII has included land take within the subject lands to ensure a direct link to allow public access to the adjoining business premises.
- Proposed scheme complies with the adopted movement strategy and will deliver a local street consistent with the Masterplan framework. Masterplan includes another potential future local road north through the subject lands. Adopted masterplan allows for alternative access arrangements to be developed to support the maintenance of the existing use on the site. The Masterplan includes measures to support existing uses while facilitating envisaged masterplan change in the area.
- It is recommended that the site-specific access solution from McKee Avenue be reviewed to minimise any potential impact. Delivery of this to be sequenced ahead of closure of St Margaret's Road access.
- Construction phasing has been considered throughout the process - works along St Margaret's Road are estimated to be undertaken in the initial 18 months of the programme.

10.17. **Response to Heetland Ltd.**

- Proposed footpath on the south side of the access road to Jamestown Business Park will terminate at the proposed scheme tie-in as there is no internal southside footpath to connect to.

- TII confirms their intention to engage in discussions during the detailed design stage to find a suitable long-term solution with regard to the location of the security hut and security provision within the Jamestown Business Park. Provision of new boundary fences are not required for the proposed access road to function.
- Private estate management issues, including service charge collection and the financial implications for Jamestown Business Park, are not matters for the Board.
- TII acknowledges that access to existing units will be affected by the change in use of the existing road pavement and permanent removal of a loading bay to unit 34/35. Solutions will be explored to minimise these impacts at detailed design stage.

10.18. **Response to HPC Sales Ltd.**

- Exact timeline of the works is dependent on a number of factors including approvals, third-party developments and construction tendering.
- TII accepts that vehicle accessibility to the eastern gable end of building will be restricted, and paved areas at the gable end that are currently being used for storage may need to be cleared.
- TII has determined that 7.5 tonne 7.17m length HGVs will still be able to drive to the access at the eastern gable end of building, turn into the building and reverse out to perform a 3-point turn.
- Reduced operational area may require changes to the existing loading and access arrangements to the premises - a turning movement is possible.
- Permanent and temporary land takes are proportionate and necessary. It is not possible to modify the route or to omit the CPO for this plot.

10.19. **Response to Jack & Lily O'Neill, Ravens Court**

- Measures to protect pedestrians at entrance to Ravens Court and along Cardiff Castle Road will include slow Luas speeds, clear visibility, driver training, designated pedestrian crossings, separate footpaths, and safety regulation.
- Recognised that the Luas crossing outside of the boundary to the estate, together with passing trams, will introduce an element of social and physical severance which is assessed as being significant, negative and long-term. Mitigation includes a slight relocation of the entrance to maximise visibility, and provision of pathway.
- Some relief from severance will be provided by the new direct access to Mellowes Road alongside the Luas.
- Pedestrians intending to cross the Luas tracks will be presented with the standard suite of traffic signs, pavement markings and surface treatments to alert them of the presence of the crossing.
- Proposed scheme has been designed to ensure that pedestrians crossing the Luas line have appropriate visibility in accordance with relevant design standards.
- Trams tend to have higher visibility than cars and are more predictable in their movements, making interaction with normal pedestrians and users safer. Residents and Luas users will quickly assimilate to the use of the Luas as has happened in other urban parts of Dublin.
- A gate at the entrance to the estate is not feasible and would, in fact, create additional problems including pedestrian access obstruction, space constraints, operational impact, and emergency access concerns.
- Comprehensive landscape plan will be prepared and agreed with residents at detailed design stage. This may include feature tree planting, evergreen flowering, street furniture and grasscrete.
- The western boundary wall 2.25m high will require relocation, to be rebuilt 4m closer to the residential properties and reducing the amount of grass in the semi-private open space. Two trees would also be removed. The impact of the loss of green space on the residential amenity of the properties in the courtyard is

assessed as slight, permanent and negative – the courtyard will continue to function as a semi-private open space, albeit smaller in size.

- TII has considered first how to mitigate the impacts but also has repeatedly consulted and continues to engage with those affected parties on relevant issues. There have been 81 communications between TII and Ravens Court residents and TII is committed to ongoing engagement.
- Mitigation for noise at this location will include floating slab track given the curvature of the track.
- EIAR demonstrates that the residual noise impact at all locations as a result of the proposed scheme operation is not significant - WHO thresholds are achieved at many locations and where they are not achieved, the assessment compares the rail noise level to the existing baseline to conclude residual impacts are slight. Sound insulation to buildings is not therefore required.
- In this particular location, with pedestrians set well back from the rail at controlled crossing points, which are also signalised together with Luas/road traffic, there is no need for drivers to activate bells during normal operation.
- Scheme does not encroach into the paved areas of the Ravens Court estate but only affects a portion of the green space - manoeuvring space remains unchanged. Emergency vehicles are always given priority and there will be no safety issues associated with alternative options available to service vehicles.
- Low speed and relatively flat section near Ravens Court reduces the likelihood of Luas breakdown – there is capability for the Luas to be towed.
- Proposed scheme does not impact existing resident car parking spaces – 3-4 unofficial on-street parking may be affected. Proposed scheme will bring positive outcome by ensuring that footpaths are not obstructed by parking. Luas and enhanced cycling facilities will help to encourage a modal shift away from private car use. Grasscrete could be used to repurpose some of the greenspace for intermittent parking.
- Consultation on the preferred route took place over an eight-week period and an options study was carried out in 2 stages. Four options were selected for further review and the emerging preferred route was identified. Non-Statutory Public

Consultation (NSPC) was then held to gather feedback from the public and stakeholders and several changes were made as a result of the feedback, leading to the final preferred route. Options between Cappagh Road and Mellowes Road underwent a full suite of environmental assessments and as a result, adjustments were made to the alignment at Ravens Court/Mellowes, leading to the final selection of the Preferred Route.

- TII has engaged in extensive consultation with residents throughout the design process, and the evolution of the proposed scheme design demonstrates the significant effort to minimise impacts and to balance the needs of the project with the concerns of local residents.

10.20. **Response to Jennifer Caul & Jason Neeson, Ravens Court**

- As above.
- Design-related risks are normally addressed separately under health and safety regulations, engineering standards, and project design reviews, rather than set out in environmental risk assessments or the EIAR.
- Limits of deviation not possible at this location due to constraints in the immediate vicinity.
- Some loss of space and amenity is unavoidable but residents will experience benefits in terms of better accessibility via the new public transport service during the operational phase.
- The vibration thresholds outlined within the EIAR are to ensure that there is no risk of damage including cosmetic damage.
- Freed up space from relocation of substation will be incorporated into the new proposed landscaping to the communal space.
- Garda station ground floor level building is located at 6.6m minimum distance from the nearest running rail and the distance from No.12 Ravens Court to the nearest running rail is 13.8m.
- At night there are some locations that slightly exceed the night-time absolute threshold of 45dB Lnight - increase in noise within Ravens Court for both the

average and peak hour of night-time operation is slight as the overall noise increase is in the range of 1.1 to 1.8dB above baseline.

- Alternative route - Multi Criteria Analysis (MCA) was conducted on 14 Options. Option including Finglas Road scored significantly lower than other options on social inclusion, safety, and compatibility with Development Plans, lower than other options on integration with transport policies and impact on material and cultural assets, but it delivered some or significant advantages over other options on journey time (very fast option), catchment, and key trip attractors.
- Any suggestion that the EIAR is a ticking of the box exercise is unfounded as is evident from the extent and comprehensive nature of the data and information contained in the main volume and extensive appendices.

10.21. **Response to Joe Duffy Property Company Ltd.**

- There are no land acquisition requirements that fall within the curtilage of the lands in the ownership of Joe Duffy Property Company Limited. Right of way to the rear is not impacted.

10.22. **Response to John Duffy, Ravens Court**

- As above.
- TII does not agree with the contention that there will be no greenspace within walking distance that does not have a Luas track going through it - existing greenspace to the south of Ravens Court will still be accessible and usable.
- Proposed scheme will reconfigure existing pathways in Farnham and Mellowes Park so that the new uncontrolled pedestrian crossings of the Luas line are situated in positions that reflect desire lines and offer good visibility. Ball stop protective netting will be provided at Farnam and Mellowes Park.
- Proposed green space in Ravens Court is approximately 8.5%. The 10% open space requirement outlined in the Sustainable and Compact Settlements Guidelines for Planning Authorities applies specifically to new planning applications for housing developments.

- Acknowledges that the value of properties can fall if subject to negative environmental effects by virtue of being in very close proximity to tracks. Estate is also located within 5 minutes' walk of the proposed Finglas Village Stop.
- Alignment has been adjusted to minimise the numbers of mature trees impacted and landscape proposals to enhance and protect biodiversity along the corridor.
- Proposed scheme will provide a new public transport connection, together with connections to local bus services, making Finglas Sports and Leisure Centre more accessible to people within a larger catchment and enhancing its ability to serve as a public community facility.
- Stop at Tolka Valley Park was not justified from a catchment perspective - the selected stops represent the best-performing locations in terms of overall scheme objectives and transport planning guidelines.
- There is suitable lighting, CCTV and emergency call points on all stops – animation, passive security and increased active travel will reduce the issue of anti-social behaviour at stop include St. Helena's. Operator will manage security and safety during the operational phase.
- Development of Luas Finglas is supported by numerous policies at National and Local level. The NDP identifies the progress made on the proposed scheme as well as continued support for project development.
- Luas Finglas project will deliver significant transport and environmental benefits to the Finglas area – however, it is recognised that broader benefits must be balanced, while also minimising disruption and impacts on existing communities.
- Based on feedback received from Ravens Court residents and An Garda Síochána, TII developed the Railway Order application design solution, which resulted in moving the alignment further west to minimises the impact on Ravens Court residents insofar as possible. Engagement is iterative, and comments and feedback are taken on board throughout the project lifecycle.
- TII is committed to addressing risks throughout the planning, delivery and operational stages of Luas Finglas – TII will continue to engage with CRR throughout the project.

- The eastern side of the Luas line will occupy a strip of land which is currently green space for Ravens Court and garden space for two properties.

10.23. **Response to Lidl Ireland GmbH**

- The business will not be required to close for the works. Traffic control measures to be maintained for St Margaret's Road are outlined in the CTMP. Intention is that some limited road closures will be undertaken at night to reduce disruption.
- There will only be a slight change to Lidl's internal layout at their entry and this is unlikely to cause significant disruption of deliveries.
- Loss of c. 35 car parking spaces must be viewed in the context of significant increases in public transport accessibility. Store will also benefit from adjacency to large P&R facility and significant future residential led mixed use development.
- TII has engaged with Lidl to explore a number of options to develop this site, with a view to maximising the Park and Ride benefits. Drawings show an indication of how the ground floor of the P&R could potentially be used by Lidl in a future redevelopment scenario.
- Relocation of the proposed substation away from the isle within the carpark can be investigated further during the detailed design phase.
- Loss to Lidl of development potential of adjoining DIY Discount site for P&R - any issues about development potential and site value, etc. will be addressed via the CPO process in the event of a Railway Order granting permission. Compensation is not a factor in the assessment of impacts nor the mitigation thereof for the purposes of the environmental impacts assessment to be conducted by the Board. All of the lands and rights in lands proposed to be acquired pursuant to the Railway Order are necessary and required for the construction and operation of Luas Finglas and there is no question of these acquisitions being excessive.
- TII does not intend to include specific details on the access arrangements, nor number of car parking spaces to be provided for Lidl, which will be subject to a separate planning application for the redeveloped site.

10.24. **Response to Mary Davitt, Ravens Court**

- As above.
- Comprehensive landscape plan would not mitigate the loss of green space but would enhance the quality of the semi-private open space in terms of function and aesthetics.
- Noise impact at Ravens Court has been robustly assessed in the EIAR submitted with the Railway Order and mitigation in the form of floating slab track has been provided. The noise impact at this location is concluded to be not significant.
- Potential impacts on Cardiff Castle and an area of modified parkland to the east of its recorded location have been robustly assessed in the EIAR. Cardiff Castle has been demolished, and its location is outside the proposed scheme boundary in an area occupied by modern housing.
- TII Project Archaeologist will agree a Cultural Heritage Strategy for Luas Finglas. Proposed scheme is located in the Zone of Archaeological Potential for the historic town of Finglas and it is a legal requirement that all works in this area are archaeologically monitored.
- There is potential for positive psychological effects during the operational phase for residents who live close to the line. There haven't been reported increased mental health problems adjacent to previous Luas lines.
- Visibility distances in the proposals significantly exceed the minimum requirements, ensuring that drivers have sufficient sightlines before entering the Luas corridor.
- Lands owned by objector required to access two neighbouring sites whose access from St. Margaret's Road is being removed. Access is aligned with the Jamestown Business Park Masterplan and will serve future development at this location. These lands are absolutely necessary for giving effect to Luas Finglas Railway Order.

10.25. **Response to Mellow Spring Childcare Development Centre**

- Statutory requirement for a 6-week consultation period was met, providing stakeholders ample opportunity to review the documents and make submissions to the Board.
- Proposed scheme will provide much improved public transport access to community facilities on Mellowes Road with benefits for Mellow Spring Childcare. Luas will provide an alternative to car use.
- During construction, alternative, nearby and convenient temporary parking and appropriately timed parking for people with disabilities and parents delivering children to Finglas Childcare/Mellow Spring Childcare Centre will be provided.
- Public right of way is to be maintained throughout construction for the safe access to be maintained to Mellow Springs facilities. There will be no requirement for facility to relocate.
- Relevant Irish and EU safety legislation will be complied with at all times. TII will continue to engage with the stakeholders at all stages of the process to ensure business concerns are considered to the fullest extent possible.
- Noise levels measured at the closest monitoring location were of the order of 68dB during the daytime. Therefore, the new noise from Luas operation will be several orders of magnitude lower than the existing baseline noise environment due to road traffic. Luas will also operate at low speeds at this location and floating slab track will be used. Soundproofing not required.
- Number of people alighting at the stop will, in itself, provide for natural surveillance with regard to anti-social behaviour, combined with the provision of good lighting, security cameras and emergency help buttons.
- Luas line will have a knee-rail fence and a landscaped strip between the footpath and Luas line leading up the pedestrian crossing point, thereby acting as a barrier between the Luas and footpath.

10.26. **Response to Megan Coughlan, Ravens Court**

- As above.

10.27. **Response to Megrick Limited (Ciarán Sudway & Associated on their behalf)**

- Enactment of the Planning and Development Act 2024, which provides for the repeal of the Planning and Development 2000 (as amended), does not impact the application of the above provisions in respect of Luas Finglas.
- Should the Railway Order be granted, a detailed business case and procurement strategy will then be provided to Government for consideration and consent must then be acquired at Approval Gate 3 of the Infrastructure Guidelines for funding to be secure for the project and for construction to commence.
- Drawings are sufficiently detailed and comprehensive to facilitate the approval process, and they provide the necessary information to inform the EIA - further detailed design will take place following completion of the planning process and stakeholders will be kept informed.
- Not possible to apply limits of deviation along St. Margaret's Road due to the existing / realigned St. Margaret's Road, the land available and the proximity to existing properties.
- Provisions of European Convention on Human Rights shall not, in any way, impair the right of a State to enforce such laws as it deems necessary to control the use of property in accordance with the general interest. Compulsory acquisition is necessary for the implementation of Luas Finglas.
- Lands are required for the construction and operation of Luas Finglas including the construction of trackwork, utilities diversions, provision of new boundaries, provision of new access roads, and landscape works, as well as the temporary acquisition of lands to allow the safe construction of boundary walls and fences. Expected overall construction programme for the main works is identified as 3.5 years. Timescale impacting objector will be much shorter, with St. Margaret's Road in total being 18 months. TII has published CPO Guide and Land Acquisition Strategy.

10.28. **Response to Michael Couglan, Ravens Court**

- As above.

10.29. **Response to Michael Liam Coughlan**

- As above
- Robust option selection process was undertaken to determine the alignment for proposed scheme.
- Increase in noise within Ravens Court for both the average and peak hour of night-time operation is slight as the overall noise increase is in the range of 1.1 to 1.8dB above baseline.
- Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works.

10.30. **Response to Manhattan Peanuts Ltd.**

- TII in the design, preparation, and assessment of proposed scheme has had full regard to the daily operations and development capacity at Manhattan Peanuts Ltd.
- Access from to the premises will be maintained throughout construction and alternative access will be provided prior to the existing access from St. Margarets Road being removed.
- Design of Luas Finglas will inform the masterplanning of the Jamestown Lands, the urban structure of which will include a strategic pedestrian/cycle amenity link crossing the Manhattan Peanuts lands aligned with key desire lines to the proposed Luas extension forming part of the green infrastructure network.
- Proposed access road at the rear of the premises is provided to ensure continuity of access for the general public and to provide access for the current business. Access road is aligned with the Masterplan for the Jamestown Business Park.
- Masterplan establishes the urban structure for the future development of the area – proposed scheme complies with the adopted movement strategy and will deliver a local street consistent with the Masterplan framework. Masterplan allows for alternative access arrangements to be developed to support the maintenance of the existing use on the site.

10.31. **Response to Murdock's Builders Merchants (Hughes Planning & Development Consultants)**

- As above.
- TII acknowledges that a change to the current circulation and access arrangement is required.
- Fire exit routes to St Margaret's Road are still available from the building as a footpath is provided alongside the building.
- Compensation is not a factor in the assessment of impacts nor the mitigation thereof for the purposes of the environmental impacts assessment to be conducted by the Board. Once the Railway Order becomes operative, those parties with interests in the lands and rights in lands being acquired will be entitled to submit a claim for compensation.
- Masterplan states that "any proposed expansion of existing business operations or the provision of on-site movement requirements that differ from those set out in the Masterplan will not be restricted, as long as they relate to the current established businesses and uses on site".
- EIAR for Luas Finglas is accurate and fully reflects the adopted Jamestown Masterplan, and that the Board has sufficient information to enable it to carry out an environmental impact assessment of Luas Finglas.
- TII will ensure new access arrangements are in place for businesses on St. Margaret's Road consistent with the Jamestown Masterplan. Highly visible signage will be provided to direct customers and suppliers to this new access. There is no need for condition to be attached to Railway Order relating to access from McKee Road. Existing access will not be removed until the new road and access is available to use.

10.32. **Response to Niamh Mooney & Darren Hanlon**

- As above.
- Standard Luas warnings for crossings will be provided for both drivers and pedestrians and will take the form of alternative surfacing, traffic signs and road

markings. A gate is not feasible as there would be insufficient distance from the likely gate location to the Luas swept-path envelope.

- Limits of Deviation (and increased land take up to 2m) are not possible along Cardiff Castle and Ravens Court due to constraints in the immediate vicinity.
- A loss of green space is acknowledged, but sufficient green space will remain to provide an amenity for children's play.
- At distances of greater than 4.5m from the track perceptible, vibration within buildings will not occur - vibration impacts at Ravens Court during operation will not cause any long-term damage and are expected to be imperceptible.
- Works entail provision of a new boundary treatment, the new access arrangement, utility works and finishes. It is expected this would take 2 months. Details regarding temporary access provisions will be discussed with homes prior to construction starting in the area.
- An option of running the Luas up Ratoath Road would be even further from the Village, would also have a large number of junctions and would be even longer - approximately 5.5km thereby adding significant cost and run times.
- Railway Order application comprises a detailed environmental impact assessment that has identified and assessed the potential environmental impacts of Luas Finglas and proposed mitigations for these impacts where necessary.

10.33. **Response to Paul McAuliffe TD**

- As above.
- Commitment to not open pedestrian access from Lakeglen remains unchanged.
- Ecologist classified grassland habitat at GAA pitches as of county level ecological importance given its capacity to support the foraging Light-bellied Brent Goose and other species. All weather pitch would also negatively impact all the other local fauna of value. Although all-weather pitch was not feasible from a biodiversity standpoint, the playing pitches will be re-aligned and equipped with a new subsurface drainage system.

- Safe crossing points of the Luas line are proposed at two locations to facilitate pedestrian access to the Farnham pitches.
- At night there are some locations that slightly exceed the night-time absolute threshold of 45dB Lnight.
- Broader redesign of Mellowes Park is outside the scope of the study.
- Substation equipment is fully enclosed within a masonry structure which effectively contains the noise – EIAR concluded that noise impacts do not occur as a result of any substation installations, including the one near the St Margaret's Road stop.
- Trees and grass will become semi-private open space for the residents of St Margaret's Court and will include additional parking spaces to ensure sufficient parking for residents and visitors.
- Footpath facilities and connectivity will be considerably enhanced by the proposed scheme in the vicinity of the Charlestown stop. Footpaths on both sides of St. Margaret's Road will provide connections to Jamestown Business Park.
- There is currently no policy supporting the extension of the green line to Ballymun or Metrolink and this is beyond the scope of this application. The demand for travel between Finglas and Ballymun would be unlikely to justify investment in light rail and is currently being met by the N6 and N4 bus services.

10.34. **Response to Rory Hearne TD**

- As above.
- Proposed scheme design and EIAR have been prepared to ensure a thorough and structured evaluation of the potential environmental effects of the proposed scheme and following an extended public consultation process.
- TII confirms its intention to continue to engage with the stakeholders and their representatives during the detailed design and construction stages to minimise impacts to the fullest extent possible.

- Reconfiguration parking spaces on St. Margaret's Road including issues of security/CCTV, landscape etc. is under discussion with residents and Dublin City Council. Parties with interests in the lands and rights in lands being acquired will be entitled to submit a claim for compensation.
- Luas scheme at St Margaret's Court will result in an increase in semi-private open space to the rear of the properties due to the relocation of the northern boundary wall.
- Increase in noise at St. Margaret's Court for both the average and peak hour of day or night-time operation is slight as the overall noise increase is less than or equal to 1dB above baseline. No mitigation required at this location.
- TII is continuing to engage with DCC regarding parking arrangements for staff at the Finglas District centre - parking area directly in front of the resource centre will be permanently removed.
- Proposed scheme will create a new space with an open area covered by CCTV and with passive security in place at the plaza.

10.35. **Response to Sport Ireland/ Connolly Hospital/ TUD**

- Bus turning area at Broombridge will be reconfigured to retain and enhance opportunities for intermodal transfers. Secure and adequate cycle storage facilities will also be provided. Removal of set down facilities aligns with the goal of reducing car use. Charlestown is designated as an interchange hub within the BusConnects network.
- Acknowledged that Greater Dublin Area Transport Strategy 2022-2042 includes for a post 2042 Light Rail extension of the green line to Tyrrelstown. Tyrrelstown Luas is subject to separate appraisal, planning and design work, and Luas Finglas does not constrain the development of this future scheme.
- TII will continue to engage with NTA and BusConnects project teams to ensure project coordination in terms of bus stop location.
- The existing interchange at Broombridge will be modified during the delivery of Luas Finglas. TII will continue to work closely with NTA and CIE to minimise any disruption during construction.

- Current design of the Park & Ride facility does not include a bus interchange; however, proposed scheme design does not preclude such provision should such a demand be identified.
- Provision of a direct link as part of the future redevelopment of the supermarket on St. Margaret's Road is anticipated and has been discussed with the owners.

10.36. **Response to Susan Coughlan, Ravens Court**

- As above.

10.37. **Response to Tempside Limited (Polonez Finglas)**

- A thorough swept-path analysis was conducted during the design development process to assess vehicle access and manoeuvrability for the existing property - proposed scheme will facilitate the necessary vehicle movements while improving access conditions compared to the existing situation.
- Drawings are sufficiently detailed and comprehensive to facilitate the approval process, and they provide the necessary information to inform the EIA. Property drawings are not intended to illustrate road layouts. Instead, their focus is on landownership and acquisition details.
- Pedestrian access will be facilitated directly from St Margaret's Road to the retail unit in question.
- During the construction phase, TII will support the viability of affected businesses by ensuring uninterrupted access for businesses impacted by the proposed scheme.
- Temporary working area to the front and west is required to construct the new boundary and the utility diversion and the duration for these will be limited to these specific works.
- Existing access will not be removed until the new road and access is available to use.
- Detailed property-specific matters are typically addressed at later stages through mechanisms such as the detailed design phase, mitigation plans, and direct

engagement with affected parties. Purpose of the EIA process is not to resolve every minor detail at this stage, but rather to assess the likely significant effects and overall implications of the project on the environment taking into account the information presented in the EIAR.

- Lands of Tempside Ltd/Polonez Finglas are required for the purposes of construction and operation of the LRT line, footpaths, landscaping, utilities diversions, etc.
- Compulsory purchase of lands does not constitute a breach of objector's constitutional right to the quiet enjoyment of their property - acquisition is necessary for the greater public good and objector will be entitled to compensation.
- TII acknowledges that the timing of the consultation period coincided with the holiday season; however, the consultation period was extended to allow for this, ensuring that affected parties had a sufficient window to engage with the process.

10.38. **Response to The National Graves Association**

- No works anticipated within the boundaries of the Liam Mellows memorial site itself apart from protective measures to prevent accidental damage. Statue and plinth and flagpole will not be disturbed in any way.
- Removal of pedestrian bridge will require the closing of the park for safety reasons – this will be limited to the days either side of a night works operation.
- Proposed path connects to the existing ramped paths to provide access close to the new crossing of the N2 and preserves as closely as possible an existing desire line for pedestrians - TII is satisfied to omit this section of footpath and will continue to engage with the stakeholders.
- Opening up pedestrian routes will encourage more footfall that will be self-regulating, with less chance of antisocial behaviour; however, TII is satisfied to omit this section of footpath.
- Ramps form an effective backdrop to the memorial and afford it an elevated view – removal of ramps and replacement with level footpaths and a new boundary would entail significant works. TII will consider resurfacing of existing paths.

10.39. **Response to Tricia Everitt, St. Margaret's Court**

- It was evident that there was disagreement on how to proceed between residents of houses 1-4 and 5-12 - some meetings took place with each group separately. TII followed up with a meeting with residents of 1-4 after they were erroneously not notified of an earlier meeting on parking regulations in estates taken in charge.
- Design proposal includes for a total of 16 additional parking spaces to the rear of St Margaret's Court - TII confirms that the reconfiguration of spaces including issues of security/CCTV etc. is still under discussion with residents, in consultation with Dublin City Council.
- TII believe that a solution close to what was proposed by residents 1-4 can be achieved, which balances the needs of the front and rear residents. Gate is not the correct solution and with demarcation and signage it will be possible to clearly identify private resident parking for residents 1-4. Proposed changes would result in the loss of a mature tree to parking, which can be mitigated by additional planting.

10.40. **Response to Turlough Hamill & Michael Cosgrove (Sudway)**

- Landscaping drawings explicitly show that a new entrance will be provided by the new access road constructed through Jamestown Business Park - property will have the necessary access as part of the proposed scheme.
- Swept path analysis demonstrates that the proposed scheme will facilitate the necessary vehicle movements while improving access conditions compared to the existing situation.
- Traffic impact deemed to be "Not Significant", and a further traffic capacity analysis is not required as part of the EIA.
- Footpath is proposed between the new Luas tracks and the property boundary. Pedestrian access can be facilitated directly from St Margaret's Road to the retail unit in question.

- New access road is a cul-de-sac with no through route for traffic onto St. Margaret's Road - the road should experience similar volumes of traffic.
- Jamestown Masterplan identifies that the Adrez lands are situated in the Phase 2 development area, with the following key infrastructure requirement: "Luas Finglas either under construction or operational before the granting of planning permissions for residential developments".
- Masterplan includes measures to support existing uses while facilitating envisaged masterplan change in the area. Masterplan states that "any proposed expansion of existing business operations or the provision of on-site movement requirements that differ from those set out in the Masterplan will not be restricted, as long as they relate to the current established businesses and uses on site."
- While the EIA provides a comprehensive analysis of the expected impacts, detailed property-specific matters are typically addressed at later stages through mechanisms such as the detailed design phase, mitigation plans, and direct engagement with affected parties.
- Mitigation at this property includes provision of a new road access from the rear; development of a cycle track and cycleway; and construction of a new boundary wall. EIAR states that the measures reduce the significance of residual impacts to slight.
- Final details will be undertaken during the detailed design stage, ensuring compliance with a potential planning permission.
- Proposed compulsory acquisitions are entirely proportionate and justified and are in the interests of the common good - there is no question of any breach of the constitutional rights.
- TII extended the consultation period to allow for the Christmas period, ensuring that affected parties had a sufficient window to engage with the process.

10.41. **Response to Voice of Vision Impairment**

- Certain images within the document could not be adequately described by text. A text only version of the document was available on demand.

- Prior to the EIAR being in a finalised state, progress updates were provided on the project in Luas User Group Meetings and in more detail with Luas Team members in direct Bilateral Meetings with VVI.
- Not all documentation within the EIAR is accessible; however, the Luas Team raised and discussed the key interfaces in the bilateral meetings.
- TII will continue to engage in dialogue with DCC, FCC and relevant stakeholders including Voice of Vision Ireland, National Disability Authority and the Luas Users Group throughout all project phases.
- Access ramp to the Iarnród Éireann inbound platform is incompatible with the proposed new Luas alignment and bridge structure - there is insufficient headroom for the current ramped access to remain.
- TII and the Luas Operator are committed to ensuring these lifts are consistently well-maintained to provide the necessary linkage.
- At detail design stage TII will design the Luas platforms to integrate with adjacent footways - tactile guidance is provided through the provision of a dished channel, which is identifiable by white cane users and also serves as necessary surface water drainage. Railings are used where other design interventions are not feasible.
- TII is amenable to the concept of differential surfacing and will engage with VVI and other visually impaired consultative groups at detail design stage in relation to this and other aspects of the design.
- TII will further engage with VVI and other visually impaired consultative groups at the detail design phase of the project in relation to tactile guidance, use of channel guidance strips, Luas stop furniture, help points and planted areas.
- TII will continue to consider the safety of all users in the detail design of Luas Finglas and will further engage with VVI on the design of kerbs, footpaths and crossings through the detail design period. Bevelled kerbs with a 60mm upstand are being provided between footpath and cycle track in accordance with the Cycle Design Manual.

- The design intent is that all raised and continuous footpath crossings will have tactile paving to indicate to people with a visual impairment the presence of the crossing, as per standard practice. All raised crossings and continuous footpath crossings on the proposed scheme will have a segregated continuous cycle track running parallel to the footpath in a contrasting colour to the footpath which will provide a guide for people with a partial visual impairment.
- Toucan crossing is proposed on St. Helena's Road where the cycle track terminates to facilitate cyclists at the road crossing. Three mid-block signalised pedestrian crossings on St. Margaret's Road are also intended to be in the form of toucan crossings. TII will continue to consider the safety of all users in the detail design of Luas Finglas and will further engage with VVI on the design of kerbs, footpaths and crossings through the detail design period.
- Cyclists dismount signage can be used but is usually not very effective. A designed solution is preferable.

11.0 Further Responses

11.1. The Board decided that this case can be dealt with adequately through written procedure and without recourse to an oral hearing. Accordingly, the Board considered it appropriate to invite submissions in accordance with Section 47D(1) of the Transport (Railway Infrastructure) Act 2001, as amended, in relation to TII's submission of 27th March 2025. In response to this invitation, the Board received a further 25 submissions which are summarised as follows:

Third Parties

11.2. **Further Response from Adrez Ltd. (Sudway & Co. Ltd.)**

- Will not be viable for any of the six businesses on site to continue to operate, in particular during construction.
- TII still have no detailed design of the proposed road.
- Proposed scheme not consistent with Jamestown Masterplan which indicates road stopping at observer's boundary.

- There is not 7m available to construct an access road through Jamestown Little Industrial Estate.
- Current access capable of accommodating a 40 feet articulated lorry.
- No swept path available and it is proposed road would meet requirements of DMURS, including safe movement of pedestrians.
- Proposed road through the site would destroy any redevelopment potential.
- Board requested to refuse permission as the proposed scheme is not in compliance with the Jamestown Masterplan.

11.3. **Further Response from Aldi Stores (Ireland) Ltd.**

- Application documents lack detail which is fundamental to observer's understanding of the real impact on their lands.
- Unable to fully understand access and operation during construction, as well as manoeuvrability of delivery vehicles and pedestrian access and loss of parking in the long term. Board does not have sufficient information to make a decision on the application as submitted.
- Aldi would seek to undertake the redevelopment of the store in alignment with the Luas works - however, there is uncertainty regarding the timing of these and duration of same.
- Disagreement between TII and observer regarding the amount of parking to be lost (19 v 11 no.). Unacceptable that the loss of car parking and the nature of temporary acquisition is not provided by TII currently.
- Observer wishes to be contacted an absolute minimum of 28 days in advance of commencement of works.
- Compensatory car parking should be provided to Aldi during construction phase to ensure normal operations can be maintained. Welcomes TII's offer of temporary car parking nearby during construction subject to satisfactory pedestrian accessibility.
- Not acceptable that information regarding temporary acquisition is deferred to a post planning/ detailed design stage.

- Greater level of detail required to ensure that full access to the store will be retained throughout construction.
- Applicant has not provided any evidence of the capability of delivery vehicles to access the store safely - road safety audit and swept past drawings required.
- Further detail drawings required to show acceptable gradients for vehicular and pedestrian traffic. Section drawings do not extend into the Aldi site and sections required to review impact to the north of the vehicular entrance.
- Details required of landscaping, boundary treatments and retaining measures to resolve level changes.
- Concerns regarding the impact of the construction timescale, which will have significant impact on the commercial viability of the store.
- Proposed Luas would appear to encroach on private drainage and watermains. Detailed design drawings required by Aldi.

11.4. **Further Response from Atlas Autoservice Ltd.**

- Extensive temporary loss of car parking during construction will significantly affect the business's ability to operate and trade.

11.5. **Further Response from Brooks Timber and Building Supplies Ltd.**

- TII confirmed that they would examine an alternative access point from Broombridge Road to assist with traffic circulation on site (meeting held on 19th May 2025).
- General principle of direct access off Broombridge Road is accepted by observer - Board could seek additional information or attach a condition to any forthcoming Railway Order in this regard.
- Observer is still concerned at the loss of overflow parking and storage space from the eastern portion of the site and the requirement for more complex circulation routes, including reverse manoeuvres for large vehicles. At present HGVs can circumnavigate the site.

- Even with additional entrance point off Broombridge Road, observer's original concerns regarding impacts to commercial operation remains valid. It is entirely reasonable that observer would seek monetary compensation to offset against these anticipated impacts.
- TII would be supportive of progressing the revised entry point should it receive approval from ABP and subsequent agreement from Dublin City Council.
- Observer commissioned an engineering review of the proposed entry point, which confirmed that it should restore a workable solution for the site. However, refinement would be required during detailed design stage of entrance geometry for articulated lorries and rigid HGVs, and sightline provision of oncoming traffic and pedestrian/ cyclist flows.
- Engineering review recommends full swept path analysis, optimised kerb profiles and pavement designs, horizontal and vertical sightline clearance, and integration of signage, tactile paving, and safety measures for vulnerable road users.
- Observer wishes to formally record objection on the basis of the extent of the permanent and temporary acquisition, which goes beyond what is necessary to achieve the stated objectives of realigning Broombridge Road.

11.6. **Further Response from Colorman (Ireland) Ltd.**

- Importance of company does not appear to have been fully understood - unimpeded operations at the Colorman site are not only critical for the business itself, but are also paramount for critical industries that it serves.
- Observer maintains position that the proposed scheme does not have full regard to the daily operations and requirements of the Colorman site, and will have a detrimental impact on the business if approved in its current form.
- Requests that the area of observer's lands subject to acquisition (temporary and permanent) is relooked at by TII and ABP and reduced. This could be requested by way of further information and implemented by condition.
- As a leading European print manufacturing company, there is a constant flow of source materials and products to and from the site – LGVs and HGVs must be

able to safely circumnavigate the site at all times. There is also a high intensity of staff related traffic from almost 200 people employed by Colorman.

- Existing access should not be extinguished until the new access off Broombridge Road is in place and fully operational.
- Colorman would need to consider directing all traffic to the Boyne Road access to the east - this access is not sufficient in its current form to cater for HGVs and staff/ visitor access. Substantial upgrades on site would be required as well as parking restrictions along Boyne Road.
- Confirmation of the timing and duration that temporary lands will be required is critical to the observer – clarity from TII is sought. Site specific traffic plan should be furnished to Colorman.
- Loss of parking may lead to haphazard parking on site which presents a safety issue for Colorman. Significant internal upgrades would be required to facilitate parking elsewhere.
- More HGV movements along the western frontage has the potential to create safety issues. New access is generally welcomed but it still alters the way in which the site operates and will cause disruption. Detailed drawings of proposed access are important so that Colorman can prepare accordingly.
- Seven day notice to traffic disruption in and around the site is not considered sufficient.

11.7. **Further Response from Downshire Propco Ltd.**

- See Brooks response above. Potential access solution generally welcomed by Downshire, the owners of the site.
- Requests that the Board attach a condition to any approval of the Railway Order requiring implementation of the new access point from Broombridge Road and obliging TII to consult with owners and occupiers to agree on detailed design of access before commencement of development.

11.8. Further Response from Fashionflo Ltd.

- Proposed development and CPO would have serious material adverse impacts on the use of the site in terms of viability of the current employment use. There is nothing in policy SMT22 to show that it overrides the meaning and purpose of the site's Z6 zoning.
- High Court has determined that zoning objectives have a higher status than other Development Plan objectives as noted by Simons J in Redmond v An Bord Pleanála [2020] IEHC 151.
- Development will have serious implications for access to the site and will undermine the viability of the site for employment.
- Difficult to understand how the Board could correctly or fairly come to conclusion, without hearing from third parties, that the case could fairly be dealt with through written procedure.
- Proposal at oral hearing to drop the entire Metrolink tunnel by number of metres lower that had been proposed to address concerns regarding impact on building basements would likely not have happened unless the hearing had been held.
- Rule of law requires all decision makers to act fairly and rationally, meaning that they must not make decisions without reasons. In cases where there is a factual dispute to be resolved, it is more likely that an oral hearing will be the only adequate means of resolving same. TII have not offered solutions outside Fashionflo's site – least worst option may not be deliverable as it appears to be reliant on future planning applications, outside TII's control.
- Documentation that should be before the Board, like a Stage 1 Road Safety Audit, is not included in the planning documentation. There are also disputes in relation to swept paths and the amount of parking that will remain. In the interests of fair procedures, Fashionflo needs an opportunity to cross question TII before the Board.
- Transport consultant's report finds that TII's stated loss of car parking (13 no. spaces) is clearly incorrect, with 18 no. of the 34 no. spaces (c. 53%) deemed likely to be lost.

- Board should revisit decision to hold an oral hearing. Board requested to refuse to confirm/ grant Railway Order. In the event that the Board is minded to confirm/ grant the Railway Order, It is requested that the emerging alternative solution (in line with the proposals set out in Transport Insight's report) be conditioned as part of the Railway Order, rather than be subject to a separate planning application, the outcome of which is unknown.
- TII advised that creation of a cul-de-sac at western end of Lagan Road, thereby mitigating negative impacts of the current proposed vehicular access arrangements, would not be possible as part of the Luas project.
- HGV manoeuvre within site could only be undertaken by 5-point-turn and would be infeasible in practice.

11.9. **Further Response from Firethorn Ltd.**

- Proposed development has not had full regard to the daily operations and development capacity of observer's lands at Manhattan Peanuts Ltd.
- Proposed development will significantly impact the ability to carry out daily operations by impeding access and resulting in complications for the future development of the site.
- Requested that access road is substantially minimised to allow observer to continue to operate – observer submitted a sketch to TII of the access road continuing approximately 1m past the boundary line. TII confirmed that it would be supportive of this. Board should seek revised plans reflecting same or amend by condition to any approval of the Railway Order.

11.10. **Further Response from Jennifer Caul & Jason Neeson, Ravens Court**

- Duplicate submission from that sent in January 2025.

11.11. **Further Response from John Duffy, Ravens Court**

- Similar points to those raised in submissions previously.

11.12. **Further Response from Lidl**

- Regarding previous submission on loss of car parking and implications for Lidl redevelopment/ expansion potential, Lidl has engaged further with TII in relation to the potential to accommodate the Luas and P&R without undue impact on the level/ quality of parking provision in particular. Proposals within the Railway Order which identify parking for 'others' within the P&R facility are being examined to try to mitigate the impacts of the CPO.
- Lidl has no further comments at this time in relation to temporary construction access disruption, the ESB substation, and lands to the rear of Lidl.

11.13. **Further Response from Jack & Lily O'Neill, Ravens Court**

- Similar points to those raised in submissions previously.

11.14. **Further Response from Mary Davitt, Ravens Court**

- Similar points to those raised in submissions previously.

11.15. **Further Response from Megan Coughlan, Ravens Court**

- Similar points to those raised in submissions previously.

11.16. **Further Response from Megrick Ltd.**

- Confirms principle of support for Luas Finglas and that Megrick is satisfied that matters raised in the previous submission can be addressed through normal CPO procedures.
- LRD planning application on the main KSG site was submitted to Dublin City Council (WEBLRD6056/25-S3) on 1st May 2025.
- Different version of the TII link road and its junction with McKee Avenue, designed in consultation with Dublin City Council Roads Department, have been included in the LRD application.
- A "Statement of Common Ground between TII and Megrick Ltd." confirms that TII is satisfied with the road as presented in the planning application.

- There is potential for construction phases of both projects to overlap and coordination may therefore be required.
- Megrick requests that the Board makes provision in the Railway Order that the alternative configuration of the TII link road can be agreed as part of the implementation of the Railway Order. It is appropriate that this is addressed in Schedules such as the 13th Schedule (dealing with landowner/ stakeholder agreements) and/ or the 14th Schedule (conditions imposed by the Board).

11.17. **Further Response from Michael Coughlan**

- Similar points to those raised in submissions previously.

11.18. **Further Response from Murdock Builders Merchants**

- Proposed works will significantly impact on daily operations by impeding access and resulting in complications for the future development.
- Even with the introduction of a new access route, the loss of land and circulation space associated with the current operations will have serious implications for observer's business.
- Murdocks will have to enter into a commercial agreement with neighbouring landowner to design and implement an entrance and parking area that is functional and appropriate – cost will need to be included in the compensation afforded to those impact by Luas.
- Retail area and warehouse will need to be relocated and reconfigured – compensation will also need to take this into account.
- Does not appear to be any measures to ensure that observer can access their site continuously during construction works. There is a lack of detailed design and mitigation measures and it is premature for the Board to approve the scheme.
- Proposal to acquire land does not represent the minimum necessary interference with property rights - adverse consequences for the business are wholly disproportionate to the asserted public benefit.

- Despite ongoing discussions, TII has not exhausted less harmful options, demonstrated why the precise lands of Murdocks must be acquired, and not offered any form of site-specific mitigation strategy.
- Revised layout displays a reduction in length of the proposed access road at the site boundary to Manhattan Peanuts Ltd./ Firethorn Ltd – Observer accepts that it does appear to offer some improvement. However, effects to business would still be significant.

11.19. **Further Response from Niamh Mooney & Darren Hanlon, Ravens Court**

- Similar points to those raised in submissions previously.

11.20. **Further Response from Susan Coughlan, Ravens Court**

- Similar points to those raised in submissions previously.

11.21. **Further Response from Tempside Ltd. (Polonez)**

- Reiterates that It will not be viable for business to continue to operate, in particular during temporary acquisition, should the scheme be approved as proposed.
- Currently have approximately 400 customers per day (800 traffic movements), as well as other businesses now meant to use new road. Safe movement of pedestrians has not been demonstrated.
- Scheme has clearly not been fully designed and is not in compliance with the Jamestown Masterplan.
- Other similar points to further response submission from Adrez Ltd. above.

11.22. **Further Response from Tricia Everitt & Tony Jones, St. Margarets Court**

- Similar points to those raised in submissions previously.
- Residents in no. 1-4 will lose their gardens and have been excluded from consultations.

- TII's duty of care to residents under CPO has been inadequate given overall lack of communication. There are grounds for judicial review.

11.23. **Further Response from Turlough Hamill & Michael Cosgrove**

- There is not enough space to accommodate a 7m road corridor through Jamestown Industrial Park on lands owned by Adrez Ltd.
- Jamestown Masterplan does not show does not show a road through the adjacent lands owned by Adrez Ltd.
- TII say they have carried out a swept path analysis but have not provided same.
- Assessment based on 100 vehicles (combined 2-way flow) is a gross under estimation of traffic flow.
- TII has not considered how new road would meet DMURS road design standards, or how it can be safely used by pedestrians.
- No details on available car parking arrangements.
- In its existing form, existing use of the building will no longer be viable.
- No thought given to how businesses would operate during temporary acquisition.
- Requests that Board refuses permission for the scheme as currently proposed.

Prescribed Bodies

11.24. **Further Response from Dublin City Council**

- No additional comments.

11.25. **Further Response from Fingal County Council**

- No additional comments.
- Reiterates its support for Luas Finglas.
- Notes commitment by TII to ongoing engagement with key stakeholders including Fingal County Council to continuously refine and enhance the accessibility features of the proposed scheme.

11.26. **Further Response from NTA**

- No additional comments.

12.0 Assessment

12.1. Having regard to the requirements of the Planning and Development Act, 2000 (as amended), this assessment is divided into three main parts, the planning assessment, environmental impact assessment and appropriate assessment. In each assessment, where necessary, reference is made to issues raised by all parties. There is an inevitable overlap between the assessments, for example, with matters raised falling within both the planning assessment and the environmental impact assessment. In the interest of brevity, matters are not repeated but such overlaps are indicated in subsequent sections of the report.

13.0 Planning Assessment

13.1. In my opinion, the main issues to be addressed under the planning assessment are as follows:

- Policy considerations
- Need and justification for the proposal
  - Expanding the network and Encouraging Modal Shift
  - Serving Existing and Future Population Catchments
  - Land Use and Transport Integration
- Impacts on Public Realm Open Space and the Street Environment:
  - Pedestrians
  - Provision for cyclists
  - Tram Users
  - Access to commercial premises
  - Private cars
- Impact on residential amenity

- Ecological impacts
- Consultation
- Environmental Impact Assessment
- Appropriate Assessment
- Compulsory Purchase Order
- Overall Conclusion

13.2. Policy Considerations

National Level

13.2.1. The **Climate Action Plan, 2025** (CAP25), refines and updates measures and actions to deliver carbon budgets and sectoral emissions ceilings for different sectors. It provides a roadmap for taking action to reduce greenhouse gas emissions by 51% by 2030 and to achieve climate neutrality by no later than 2050.

13.2.2. The Avoid-Shift-Improve Framework is outlined to achieve a net zero decarbonisation pathway for the transport sector, whereby actions are prioritised to *avoid* the need to travel; *shift* to more environmentally friendly modes; and to *improve* the energy efficiency of vehicle technology. Specific measures under this approach include compact growth transport orientated development, improved active travel infrastructure and better public realm. A Dublin Study commissioned by the Department of Housing, Local Government and Heritage and the Department of Transport in 2023 on Opportunities for Transport Orientated Development (TOD) in Major Urban Centres identified 14 optimum locations in Dublin that are proximate to existing or planned high-capacity public transport nodes. Luas Finglas will support TOD at two medium to long term opportunity sites at Glasnevin and Dublin Industrial Estates (c. 52 ha), and at Jamestown and Charlestown (c. 70 ha).

13.2.3. Luas Finglas will also promote active travel through the provision of enhanced cycle tracks along certain sections of the corridor. Protected junctions for cyclists and improved cycle parking provision will also provide for a safer and more secure experience for cyclists travelling along the corridor and interchanging with Luas. Cycle provision is assessed in more detail below.

13.2.4. Active travel will also be encouraged by the public realm improvements associated with Luas. Footpaths along the route will be upgraded and new planting will improve visual amenity. The presence of trams passing through existing green space will provide an element of passive surveillance and an overall increase in activity along the corridor. This is also assessed in more detail under pedestrians and the public realm and open space considerations.

13.2.5. Overall, Luas Finglas will encourage an increase in sustainable transport trips and modal share and this is seen as a key action for delivering an abatement in transport emissions in CAP25, i.e. 20% reduction in total vehicle kilometres travelled relative to business-as-usual, 50% reduction in fuel usage, and significant increases to sustainable transport trips and modal share.

13.2.6. **The Revised National Planning Framework** outlines a set of goals expressed as ten National Strategic Outcomes (NSO) to deliver shared benefits for communities across the country. Of most relevance to Luas Finglas is National Strategic Outcome - Sustainable Mobility, which recognises the need to move away from combustion engine driven transport systems. This will be achieved through the expansion of public transport alternatives to car transport, thereby reducing congestion and emissions, and catering for longer term strategic planning for Transport Orientated Development.

13.2.7. The proposed scheme will also help to deliver other NSO's relating to compact growth and transition to a low carbon and climate resilient society. The proposed scheme can therefore be viewed as a wider integrated land use and transportation plan that sets out to fulfil the National Strategic Outcomes and National Policy Objectives of the NFP. Of particular relevance are, National Policy Objective 10 which aims to *"deliver Transport Orientated Development (TOD) at scale at suitable locations, served by high capacity public transport and located within or adjacent to the built up footprint of the five cities or a metropolitan town and ensure compact and sequential patterns of growth"* and National Policy Objective 37 which seeks to *"ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages."*

13.2.8. As noted above, Luas Finglas will enable TOD at Jamestown and Baile Bogáin. These sites will make a significant contribution towards compact growth and the target of delivering 40% of all new housing within the existing built-up areas of cities, towns and villages on infill and/or brownfield sites. TOD is a form of urban development that seeks to maximise the provision of housing, employment, public services and leisure space in close proximity to frequent, high quality transport services, such as Luas Finglas.

13.2.9. The **National Development Plan** makes provision for investment in public transport and sustainable mobility solutions, with Luas Finglas being recognised as the most advanced light rail project, with approval recently received under Decision Gate 0 (Strategic Assessment) of the Public Spending Code. Funding through the NDP will also have a transformative potential to substantially increase the numbers choosing to make active travel part of their daily life, improving personal health and mental well-being, making our city, town, and village centres more vibrant and people focused spaces, and significantly addressing our climate action challenge. Investment priorities in **The National Investment Framework for Transport in Ireland** are supplemented by modal and intervention hierarchies which encourage the use of active travel and public transport ahead of solutions reliant on private transport. It is an action of the **National Sustainable Mobility Policy** to continue the appraisal and planning for new light rail in Dublin, including the completion of : planning application documentation for Luas Finglas.

Regional Level

13.2.10. The **Eastern & Midlands Regional Spatial & Economic Strategy** (RSES) provides an investment framework and climate action strategy to support the implementation of Project Ireland 2040 (National Planning Framework and National Development Plan) at a regional level. The Strategy includes the Dublin Metropolitan Area Strategic Plan (MASP), which is an integrated land use and transportation strategy that sets out guiding principles for the sustainable development of the Dublin Metropolitan Area. This plan seeks to focus growth along existing and proposed high quality public transport corridors in the interests of transport and land use integration and to support the delivery of Luas extension and other major transport programmes.

13.2.11. RSES also states that the 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), in addition to public transport use, and the creation of a safe attractive street environment for pedestrians and cyclists. This is reflected in Luas Finglas whereby streets and public spaces are being redesigned to prioritise active transport modes and bus transport as alternatives to the car. The RSES also supports the delivery of the strategic park and ride projects, including Finglas.

13.2.12. Bus and light rail are seen as a key part of the overall public transport system within the **Transport Strategy for the Greater Dublin Area, 2022-2042** as a more viable option in serving a city of the scale and density of Dublin, in that a much wider population can be served directly with a high quality system. It is also noted that light rail can also be delivered incrementally with extensions added to the original lines as and when demand for travel justifies them. Proposed light rail elements of the comprehensive public transport network for Dublin to be delivered by 2042 include Luas extensions to Finglas, Lucan, Bray and Environs and Poolbeg.

13.2.13. Specifically, Luas Finglas accords with 'Measure LRT3 – Luas Finglas', which states that *"it is intended to extend the Luas Green Line northwards to Finglas, inclusive of a potential park and ride facility at or close to its terminal stop."* The proposed extension to the depot facilities at Broombridge also accords with 'Measure LTR12 – Additional Depot Facilities'.

13.2.14. Specific measures are outlined in the Strategy to incorporate a high standard of urban design and placemaking into major public transport infrastructure schemes and walking and cycling projects, taking account of architectural heritage and biodiversity (PLAN14 and PLAN15). Upgrades to the public realm with form part of the Luas Finglas project, most notably at east of the tram stops at St. Helena's, Finglas Village, St. Margaret's and Charlestown.

13.2.15. The updated **Greater Dublin Area Cycle Network Plan** is published alongside the Transport Strategy. Cycle facilities proposed under Luas Finglas will contribute towards the intention to deliver a safe, comprehensive, attractive and legible cycle network in accordance with the updated Greater Dublin Area Cycle Network.

13.2.16. The 2022 Greater Dublin Area Cycle Network Plan illustrates the northern section of the proposed scheme along St. Margaret's Road as a "Primary Radial" route. This route continues along McKee Avenue. Luas Finglas will interact with "Secondary" routes at the junction on the N2, before the route continues along Casement Road, parallel to the Luas. Mellowes Road is designated as a "Primary Orbital" route and Patrickswell Place is a "Secondary" route. The section of Farham Drive parallel to the Luas alignment is also designated as a "Secondary" route. The Luas alignment will cross the "Greenway" at Tolka Valley Park before joining the "Secondary" route along Broomfield Road.

13.2.17. The proposed scheme will help to deliver the Cycle Network through installation of cycle tracks and safer junctions, many of which are located at intersections with other routes in the network, e.g. Finglas Road Roundabout works at the intersection of a primary radial and secondary routes.

<u>County Wide Policy</u>

13.2.18. Luas Finglas extends partly through Fingal County Council and mostly through Dublin City Council. The current operative plans for these local authorities are the Fingal County Development Plan 2023-2029 and the Dublin City Development Plan, 2022-2028.

13.2.19. Luas Finglas accords with the key strategic objective of the **Fingal County Development Plan, 2023-2029** of strengthening the integration of land-use and transport planning, with a priority focus on increased provision of walking, cycling and public transport infrastructure. The proposed scheme will also contribute towards the creation of attractive public realms and healthy placemaking to ensure that communities are connected in a sustainable and efficient way.

13.2.20. The integration of land use and transportation is a core theme of the Development Plan in terms of connectivity and movement. This is reflected in Objective CMO3 which seeks to *"support and facilitate high-density, mixed-use development and trip intensive uses along public transport corridors and to ensure the integration of high-quality permeability links and public realm in conjunction with the delivery of public transport services through plan frameworks to generate and reinforce sustainable patterns of compact growth and development in the County."*

13.2.21. Luas Finglas is referred to directly under *Objective CMO23: Enabling Public Transport Projects,* which aims to *"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."* Furthermore Objective CMO24 seeks to stakeholders in implementing the NTA Strategy including MetroLink, BusConnects, DART +, LUAS and the GDA Cycle Network. Fingal County Council will also work with stakeholders to optimise accessibility to public transport, increase catchment and maximise permeability through the creation of high-quality walking and cycling routes linking to public transport stops, (Objective CMO29). Finally, Objective CMO30 aims to avail of the opportunities provided by any public transport infrastructure works to improve and provide new cycling and walking links, including crossings of motorways and major roads which currently represent major permeability barriers to active travel.

13.2.22. In general, Luas Finglas is consistent with the connectivity and movement policies and objectives of the Fingal Development Plan for modal shift to sustainable transport, transport orientated development and provision of enhanced public transport. The proposed scheme will also facilitate the Council's aims with respect the promotion of active travel, public realm improvements and improved linkages and efficient interchange between transport modes.

13.2.23. The Sustainable Movement and Transport chapter of **Dublin City Development Plan, 2022-2028** highlights that the sustainable and efficient movement of people and goods is crucial for the success and vitality of the city, along with the need to move away from private car and fossil-fuel-based mobility to reduce the negative impacts of transport and climate change.

13.2.24. It is acknowledged that the impact of public transport infrastructure projects on mode share is more likely to come into fruition during the lifespan of the following Development Plan. Notwithstanding this, Dublin City Council under Policy SMT22 – Key Sustainable Transport Projects supports the delivery of an integrated public transport network serving existing and future needs of the city.

13.2.25. Improvements to the environment and public realm will be necessary to encourage walking, cycling and public transport use and the opportunities are recognised for developing public realm when new public transport proposals are being developed. This will be implemented through the Luas Finglas facilitating active travel and public transport improvements and associated public realm improvements. Placemaking will occur as a result of Luas Finglas, most notably at each of the tram stops, and through the provision of a more pedestrian friendly and active environment. These measures will comply with Policy SMT12 – Pedestrians and Public Realm, which aims *"to enhance the attractiveness and liveability of the city through the continued reallocation of space to pedestrians and public realm to provide a safe and comfortable street environment for pedestrians of all ages and abilities."*

13.2.26. The integration of active travel with public transport will comply with Policy SMT19 which seeks *"to work with the relevant transport providers, agencies and stakeholders to facilitate the integration of active travel (walking/cycling etc.) with public transport, ensuring ease of access for all."* Dublin City Council has actively engaged with TII during the consultation process. Furthermore, the Board has received submissions from both local authorities and the points raised will be considered in this assessment.

13.2.27. The overall aim of Dublin City Council with respect to transport and sustainable movement is a key objective of the Luas Finglas and this can be summarised under Policy SMT4 – Integration of Public Transport Services and Development, which seeks *"to support and encourage intensification and mixed-use development along public transport corridors and to ensure the integration of high quality permeability links and public realm in tandem with the delivery of public transport services, to create attractive, liveable and high quality urban places."*

<u>Local context</u>

13.2.28. The **Jamestown Masterplan, 2023** was prepared by Dublin City Council to inform the sustainable and sequential regeneration and development of 43 hectares of land currently comprising Jamestown Industrial Estate. Approximately 3,500-3,800 homes will be supported by the Masterplan together with 138,000 sq.m. of employment floorspace. A sustainable mobility hub will be located alongside the masterplan lands that will bring together the proposed Luas station at St. Margaret's,

the BusConnects Core Bus Corridor to the city centre, and the proposed park and rise on North Road. The sustainable mobility hub will be linked to community hub of the masterplan lands by a community/ cultural corridor. Key pedestrian/ cycle routes will be formed along this corridor to facilitate active travel.

13.2.29. Luas Finglas forms an integral part of the masterplan by enabling the park and ride and St. Margaret's light rail station elements of the sustainable mobility hub. The proposed scheme will also contribute to active travel in this area through provision of enhanced footpaths, cycle tracks, protected junctions, crossings, desire lines, cycle parking and rest and amenity areas.

13.2.30. It is also a specific objective of the Fingal County Development Plan, 2023-2029 to prepare a Framework Plan for Jamestown Industrial Estate to examine future rejuvenation opportunities for the lands, due to their location adjoining regeneration lands in the Dublin City Council area. The boundary between Dublin City Council and Fingal County Council continues through the northern part of the Jamestown lands. Luas Finglas will also contribute to the future Framework Plan through provision of active travel measures and the light rail station at Charlestown.

13.2.31. A **Draft Masterplan for Baile Bogáin (Ballyboggan)** was issued for public consultation until 12th May 2025. The masterplan is being developed for c. 77 hectares of land either side of the southern end of the proposed Luas extension within Dublin Industrial Estate and Environs. The vision for the area is that of a modern, mixed use urban neighbourhood with a strong residential and community focus which maintains complementary commercial uses, supports existing employment and provides the opportunity for new employment growth.

13.2.32. The masterplan lands will be served by the existing Luas station at Broombridge. The proposed Luas extension will improve accessibility to and from the masterplan land from the north. Upgrades to the public realm along Broombridge Road will also benefit the masterplan lands by increasing on-street activity and improving visual amenity. This will include major SuDS features, street trees and amenity space along the proposed Luas alignment. It is also noted in the Draft Masterplan that the provision of an existing transport interchange at Broombridge and proposals for BusConnects, Dart+ West and Luas Finglas will support a compact form of development.

13.2.33. Overall, the proposed Luas Finglas remains an integral and pivotal part of the requirement to tackle climate change and to enable a meaningful shift within the transport sector to active and sustainable transport modes. I would be satisfied that the proposed development is acceptable in principle and follows the consistent message within all levels of policy that there must be a transition to a low carbon and climate resilient society. This requires a reduction in car dependency to contribute towards lower energy consumption, CO_2 levels and pollutant emissions. Sustainable mobility, compact growth and land use and transportation integration through TOD are essential for the creation of sustainable communities that minimise private car use, prioritise cycling, walking and public transport and promote the efficient use of land. I am therefore satisfied that the proposed development is in accordance with the policy objectives set out in various plans and documentation referred to above.

13.3. Need and Justification for the Proposal

13.3.1. It has been demonstrated above that Luas Finglas is needed and justified in terms of overarching policy considerations on climate change and a necessary shift to sustainable transport modes to reduce greenhouse gas emissions in the transport sector and to promote Transport Orientated Development. Continuing on from policy considerations, this section addresses more specific ways that the proposed scheme is needed and justified to encourage modal shift by expanding the network (mention links to airport and metro); encourage land use and transport integration; and to improve connections, particularly for disadvantaged groups.

<u>Expanding the Network and Encouraging Modal Shift</u>

13.3.2. As noted in the policy section above, modal shift from the private car onto sustainable transport modes is critical from the point of view of alleviating congestion and reducing emissions from combustion engines. For this to happen, realistic high quality sustainable transport alternatives are needed. Alternatives become realistic when sustainable transport journeys become more comprehensive, efficient and comfortable.

13.3.3. Expansion of the public transport network can have a multiplier effect in terms of patronage when linear infrastructure expands into a wider network. The wider the network, the more people that are brought within the catchment of high quality public

transport. This is evidenced in the expansion of Luas in Dublin. Two separate tram lines (Red and Green) began operating in 2004 and these lines served distinct linear catchments. Luas Cross City from St. Stephen's Green to Broombridge opened in 2017 as an extension of the Green line through the city centre and north-west to Broombridge. This facilitated the intersection of the Green and Red lines and the ability to interchange at Marlborough Street/ Abbey Street/ O'Connell Lower. Luas Cross City and the extension of the Green line to Brides Glen therefore enabled passengers boarding on any of the 13 tram stops between St. Stephen's Green and Sandyford on the original green line to access a total of 66 other stops.

13.3.4. The current Luas network allows for interchange with mainline train services at Broombridge, Heuston Station and Connolly Station. A terminus will be provided at Spencer Dock as part of the Dart + West project, which will integrate Luas Red Line services with the new electrified Dart to Maynooth and M3 Parkway. Luas Finglas will also interact with BusConnects F Spine Services at Finglas Road where the sustainable transport hub is proposed, including the park & ride.

13.3.5. Luas Finglas will add a further four stops to the light rail network. These stops will initially act more as origin than destination stops, thereby serving the local population rather than bringing outsiders to the area. There are few major trip attractors along the new alignment and therefore Luas Finglas will serve the purpose of bringing people from the catchment onto the wider public transport network. Notwithstanding this, any expansion of the network also has the potential to attract new trips to the area for routine purposes, e.g. to places of employment, retail of leisure. There is also the increased potential for one-off trips to be made by public transport.

13.3.6. In terms of coverage, the proposed extension will help to fill the gap in the network in the north-western part of the city and this will have the effect of drawing in catchments, particularly with the proposed park & ride which will serve the wider hinterland to the north and north west of the city. Overall, the proposed extension to the Green line will contribute towards network building and the accumulative ability of public transport journeys to replace private car journeys. The proposed extension will directly serve the local population but indirectly a greater catchment of facilitated through the proposed park & ride. An assessment of the existing and potential catchment is assessed in further detail below to arrive an overall view on the need and justification for the proposal.

13.3.7. A number of third-party submissions, including those from public representatives, focused on what was considered to be the lost potential to extend the Green line further towards Dublin Airport or eastwards towards Ballymun to intersect with the proposed MetroLink at Northwood Station. In response to these submissions, TII submitted that there is currently no policy supporting the extension of the Green line to Ballymun or Metrolink and this is beyond the scope of this application. It is highlighted that the demand for travel between Finglas and Ballymun would be unlikely to justify investment in light rail, and public transport between these centres is currently being met by the N6 and N4 bus services.

13.3.8. I would be in agreement with the applicant that the further extension of the Luas Green line along St. Margaret's Road is outside the scope of this study and is not supported by policy. I note also that a new bus service from Charestown to Dublin Airport is proposed under BusConnects. Route 24 (Airport-Charlestown-Ballygall Road-Merrion Square) will operate at 20-minute frequencies during weekdays, 20- and 30-minute frequencies on Saturday, and 30- and 40-minute frequencies on Sundays. The N4 and N6 orbital services referred to by the applicant will operate mostly on 10 minute frequencies. I concur that these services will provide a good level of connection to the Charlestown Luas stop.

13.3.9. In general, the surrounding area will be well provided for in terms of public transport connections. Realistic modal shift is therefore attainable. The proposed park & ride facility is also well placed to contribute towards modal shift in this context by facilitating longer distance mixed modal journeys from areas poorly served by public transport in north Co. Dublin and is surrounding counties.

<u>Serving Existing and Future Population Catchments</u>

13.3.10. Any new public transport infrastructure must be justified for its potential to attract trips. The existing and future catchment population must therefore be calculated for this purpose, as well as other trip generators such as employment, retail and leisure activities.

13.3.11. The **existing** population catchment for the proposed Luas extension is set out in the EIAR. The existing population within 1km of proposed stops (CSO, 2022) is 17,892 for Broombridge, 19,550 for St. Helena's, 19,166 for Finglas Village, 17,676 for St. Margaret's, and 14,874 for Charlestown. There would be significant overlap where a

proportion of a population falls within the radius of two stops. Notwithstanding this, I would be satisfied that there is a significant catchment to support each of the Luas stops at their proposed locations. It was suggested in a submission from Dublin City Council that Tolka Valley Park would be an appropriate location for an additional tram stop; however, TII discounted this on the basis that a Luas stop at this location would not be justified from a catchment perspective. It is also noteworthy that the emerging preferred route was identified as the shortest in length and with the highest catchment per kilometre.

13.3.12. Also of relevance for the existing population, the proposed development has the potential to promote local regeneration; provide for gender equality, child, and elderly friendly spaces; and provide societal benefits for Finglas by placing emphasis on place-making and public realm. These items are addressed in more detail below. The proposal also has the potential to improve access to and from the area with associated benefits for the local community. It is a key objective of the proposed scheme to improve accessibility to jobs, education and other social and economic opportunities through the provision of improved sustainable connectivity and integration with other public transport services.

13.3.13. Improved connections as a result of the proposed scheme can disproportionately benefit those who are most disadvantaged or socially excluded. There are several areas along the length of the proposed Luas route that are categorised as extremely disadvantaged or very disadvantaged as indicated by the Pobal Deprivation Index (Census Small Area, 2022). The area to the west of St. Helena's Stop is categorised as very disadvantaged and only the area around the Charlestown terminus stop to the north is within an area marginally above average. In addition, it is noteworthy that around a quarter of households within the Finglas area do not have access to a private car. Access to a car also tends to be proportionately lower for people with disabilities compared to the general population.

13.3.14. The proposed scheme will allow for the provision of high quality public transport along the Luas corridor, thereby providing better connections to those on low incomes or those disabilities without access to car transport. Households along the route will benefit from improved access to a wider range of job opportunities, which can result in wealth increase and improved mental and physical wellbeing. Better

access to services across the city can encourage activity and footfall to support new businesses and services, either within the catchment or elsewhere.

13.3.15. The Building for Everyone – A Universal Design Approach (Centre for Excellence in Universal Design 2020 guidelines have been followed in the design of the proposed scheme. This will make the urban environment easier and safer for people with visual impairment and mobility difficulties, as well as parents with pushchairs. Tactile paving and dropped kerbing will be installed throughout and trams will be wheelchair accessible. Light rail may also be easier to access for those with impairments compared to bus transport.

13.3.16. It is likely that young and elderly people will benefit from more reliable public transport and a safer pedestrian and cycling environment. Independent mobility for children can grow as road safety improves and this can increase social interaction and exercise. It should be noted that there are a number of schools along the Luas corridor. The most vulnerable road users are pedestrians and cyclists who are five to 10 times at risk of injury per kilometre than a motorist in a car-dominated environment (Elvik 2009). One of the main advantages of the proposed scheme will be the improvement in pedestrian and cyclist facilities, thus making the corridor safer, more accessible and usable for vulnerable road users and those with no access to a car.

13.3.17. As noted above, the other main benefit of the proposed scheme in terms of improved connections is better integration between transport services and facilities. Multi modal journeys will be facilitated through provision of cycle parking at tram stops and a general increase in cycle parking will encourage walking along with cycling. The proposed scheme will integrate with the Broombridge Interchange at its southern end and exchange between transport services will be made easier by next generation ticketing and integrated fare structure proposals.

13.3.18. In terms of the **future** population served by the proposed Luas, the traffic and transport assessment carried out for the EIAR reports a population growth estimate for the catchment of the proposed scheme from 49,866 in 2022 to 56,641 in 2035. This corresponds approximately to the National Planning Framework, 2018, which forecasts that the population of the Greater Dublin Area will increase by 25% by

2040. Up to 2050, the population in the catchment area around Luas Finglas is forecast to grow to just over 64,000.

13.3.19. It is estimated that 73% and 55% of the forecasted population growth in Finglas respectively will be within a 10-minute and 5-minute walk of a Luas Stop. The introduction of the additional transport capacity brought about by Luas will result in a doubling of public transport trips across the canal into the city. Overall, it is forecasted that the proportion of people travelling via sustainable modes increases from 71% in the Do Minimum scenario to 81% with the delivery of Luas Finglas (Do Something). Luas Finglas will lead to an increase of 1.3 million low carbon public transport trips in 2035, increasing to 1.8 million in 2050. Without Luas, travel from the north-west of the city is constrained by pinch points on the road network for both cars and bus-based public transport crossing the Royal Canal and this will be exacerbated by the population growth planned for the study area.

13.3.20. 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 is projected to result in an approximate reduction of 10,000 car trips daily and 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.

13.3.21. Section 19.3.4 of the Greater Dublin Area Transport Strategy 2022-2042 sets out criteria for appropriate locations for new development. In this regard, it is stated that statutory plans should *inter alia* seek to provide for the review of existing zonings for residential and employment development with a view to ensuring development takes place within the 1km walking catchment of an existing or committed future public transport service. In this regard, the following section looks at the potential of the proposed scheme to promote Transport Orientated Development.

<u>Land Use and Transport Integration</u>

13.3.22. One of the main objectives of the proposed scheme is to enable compact growth, regeneration opportunities and more effective use of land in Dublin, for present and

future generations, through the provision of safe and efficient sustainable transport networks. The ability to move greater numbers of people along transport corridors also presents the opportunity to increase the volumes of people living, working and staying along the corridor.

13.3.23. A number of significant projects are proposed, have been permitted or are under construction along the proposed Luas extension corridor. At the northern end, the Charlestown development is currently proceeding with the development of up to approximately 1,000 apartments in proximity to the existing shopping centre. The Jamestown Masterplan site off St. Margaret's Road will support approximately 3,500-3,800 homes, together with 138,000 sq.m. of employment floorspace. At the southern end of the proposed Luas extension, a masterplan is being developed for Ballyboggan covering an area of c. 77 hectares.

13.3.24. As noted above, the Jamestown and Ballyboggan sites are identified as two of 14 optimum locations in Dublin that are proximate to existing or planned high-capacity public transport nodes within the "Opportunities for Transport Orientated Development (TOD) in Major Urban Centres" study by the Department of Housing, Local Government and Heritage and the Department of Transport in 2023.

13.3.25. It is crucial that Luas Finglas is implemented to serve the compact growth that is occurring along the length of the corridor so that walking, cycling and public transport emerge as the preferred modes of travel in the interests of sustainable city living and environmental impacts. Sustainable travel patterns should be easier to achieve if the new population along the corridor has high quality active travel and public transport infrastructure in place. New residents will be less habituated to the private car and can utilise active modes and public transport without having to perform a modal shift. It should also be re-emphasised that larger scale Transport Orientated Development (TOD) is planned and permitted on the basis of high quality public transport.

13.3.26. In addition to greater demand for travel along the Luas corridor, compact growth and higher densities will also require improved public realm both in terms of quality and quantity. There is an opportunity for TOD to actually discourage travel, by providing for critical mass as noted, and leading to the provision of better services and facilities for everyday living and the creation of local jobs within walking distance. This could also have the effect of decreasing travel distances as a greater number of

destinations on the Luas corridor begin to emerge and the need to travel into the city centre diminishes. As a next step, Luas Finglas and associated TOD could result in new destinations and greater levels of travel to the area.

13.3.27. Overall, good land use and transport integration complies with the Avoid/ Shift/ Improve hierarchy promoted within CAP24/ CAP25. The need to travel is minimised; modal shift to public transport and active travel is encouraged due to better services and infrastructure that will be widely used; and electrified public transport becomes more practical. In general, the Luas Finglas extension and the associated compact growth along the corridor is an excellent example of land use and transport integration taking place in a planned manner that will be hugely beneficial to existing and future residents and users of the corridor.

13.4. Impact on Public Realm, Open Space and the Street Environment

13.4.1. Under DMURS, the creation of walkable, cycleable and public transport orientated communities will require designers to re-examine the way streets are designed in order to meet the needs of all users. Pedestrians must be placed at the top of the street user hierarchy, followed by cyclists and public transport. The car is placed at the bottom of the hierarchy, but it is recognised that this may be the only option for many users for medium to longer distance journeys. The key issue is one of balance, and the needs of the car should no longer take priority over the needs of other users or the value of place. The balanced approach is to be achieved through the four key principles of integrated and connected networks, multi-functional place-based streets, a pedestrian focus and a multi-disciplinary approach.

13.4.2. The proposed scheme will give rise to significant changes in the way that the corridor is experienced along the route of Luas Finglas. The tram stops will form new hubs for the local community; there will be significant improvements to the street environment; open spaces will experience a degree of severance; there will be improvements to cycle infrastructure; access to certain commercial premises will be altered; and access for general traffic will be affected.

13.4.3. This section examines the impacts of the proposed scheme on open space, public realm and the street environment by reference to each of the main affected users,

i.e., pedestrians, cyclists, tram users, commercial premises and private motor vehicles.

Pedestrians

13.4.4. A transport project of this nature focuses purely on the efficient movement of people along the corridor by public transport and bicycle. By extension, there is the risk that Luas Finglas becomes more of a movement corridor at the expense of developing good quality places for people to stop along the route. The proposed scheme does include a series of improvements to the public realm that may encourage people to use and enjoy these spaces, in particular at St. Helena's and Finglas Village stops. There will also be general landscaping works, which will help to improve the visual attractiveness of the route.

13.4.5. Jan Gehl surveys carried out for the proposed scheme on existing social and physical activity taking place in open spaces and parks showed that in certain areas, no young children or seniors were observed and two-thirds of users were male. In areas where there has been an issue with anti-social behaviour, no stationary activity was recorded on the days of the Jan Gehl survey. As noted in the EIAR, certain green spaces have been neglected and are little visited, containing no walking or play facilities and often serving as simply a green barrier between neighbourhoods.

13.4.6. A successful public realm is usually determined by the quantity of people using the space. People friendly streets and parks have an ability to attract and retain activity. It is therefore essential that these spaces are designed so that at least a small amount of people are utilising them most of the time on a year-round basis. This will help to provide public realm that is safe, pleasant and inviting, and enlivened by people walking, talking, exercising and resting. An appropriate mix of soft and hard landscaping should be provided; an ecologically rich public realm that is landscaped with trees and planting will provide habitat and food for animal and bird species, allow for intimacy and shelter, improve visual amenity and assist with drainage.

13.4.7. Variety in terms of space and visual appearance is also an important determinant for successful public places. Small intimate spaces with plenty of detail are preferable to wide open passive green spaces, which tend to be bland, impersonal and formal. Visual surroundings that are varied also add interest and help to retain people on a regular basis. The presence of people has the multiplier effect of attracting more

people simply because there is a crowd or due to the perceived safety of natural surveillance. Key aspects for good public spaces include limitation of traffic, good resting opportunities, passive surveillance, active edges, variety of use, landscaping, good access and pedestrian desire lines, comfort from the elements, views of people and space, and adequate facilities such as toilets, bins, bollards, cycle parking, etc. Proper consideration of these factors can help to provide places that are attractive for people to linger.

13.4.8. The presence of the Luas moving through open space areas will, in itself, provide a degree of passive surveillance of these spaces, as well as movement and animation in areas that can otherwise feel empty and uninviting. In particular, St. Helena's Park will benefit from the presence of the trams and increased levels of active travel in an area that has suffered from anti-social behaviour. Existing green spaces along the route tend to be linear in nature and in some respects the tram line and active travel paths will reflect this pattern and help to connect each greenspace.

13.4.9. Significant landscaping and public realm works are proposed around the St. Helana's stop. I would have some concern that the layout in this area is overly complicated and that pathways do not follow desire lines. There is also an issue with the cycle track, which I shall address further below. The treatment of the roadway may also need to be addressed so that the area around St. Helena's Stop can integrated better with the adjacent playing pitches. Motorists travelling along St. Helena's Road at this location should be made to feel that they are travelling through an area with pedestrian activity. I propose the attachment of a condition to any approval requiring the applicant to submit proposals for shared surfacing along St. Helena's Road at this location. This would have the effect of creating better connections for active travel and increasing animation in this area. A more open boundary to the pitches may also be desirable.

13.4.10. An adverse impact associated with the proposed scheme is the degree of visual severance through open spaces. Tolka Valley Park in particular will experience linear intrusion with the proposed track, overhead lines and the moving trams themselves. However, tracks will be level with the ground and grassed, and trams will move slowly through this space. In my opinion, benefits of natural surveillance and increased activity will outweigh any adverse effects associated with severance.

13.4.11. In addition to the improved appearance along the route, as well as increases in natural surveillance and a reduction in traffic noise and dominance, the proposed scheme will also result in better facilities for pedestrians through upgrades to footpaths, increased directness and new pedestrian crossing facilities. I note that proposed 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).

Provision for Cyclists

13.4.12. From the outset, it should be highlighted that the proposed scheme introduces enhanced cycle infrastructure into areas where there was previously none. The main positive impacts in terms of cycling are the provision of approximately 3km of segregated cycle tracks and 100m of non-segregated cycle lanes along the corridor, as well as high quality cycle parking at trams stops, including covered cycle storage facilities at Broombridge Terminus, Finglas Village Stop and St Margaret's Road Stop and within the Park & Ride facility.

13.4.13. In comparison to the current situation, I consider that the greatest improvement in terms of cycle infrastructure is along St. Margaret's Road. It is suggested in submissions that a "cyclops" junction would be more appropriate at the Charletown stop. With this arrangement, cyclists going straight through the junction would have their visibility increased to left turning cars and pedestrian crossing distances would be shortened. TII has agreed that a "cyclops" junction can be considered for the Charlestown junction and also for the Finglas Road / North Road junction at detailed design stage.

13.4.14. The proposed scheme will introduce a cycle linkage along Broombridge Road between two greenways along the Royal Canal and Tolka Park. This positive intervention will widen the traffic free network over greater distances for both leisure and commuting cyclists. There is some concern in terms of cycle safety at the humpback bridge. In response, TII highlight that the DART+ West Project aims to provide two-way access across Broome Bridge for buses as well as for cyclists with one-way access northbound only for all other vehicles as per existing. TII also state that consideration will be given to improving junction layout at Ballyboggan Road for

cyclists at detailed design stage. I agree that this is necessary to afford better clarity and protection for cyclists and pedestrians.

13.4.15. There is concern that the proposed cycle way along the new Luas bridge over the Tolka River would also be used by pedestrians. It is suggested that the bridge is widened so that there is sufficient room for pedestrians and cyclists to share space. TII note, however, that further widening of this bridge would lead to additional loss of the treatment area of the Integrated Constructed Wetland in Tolka Valley Park. I agree that this is an issue, and one that will be exacerbated with the downgradient nature of the cycle track and the potential for bicycles and scooters to travel at speed. Notwithstanding this, I would be satisfied the instances of pedestrians using the cycle track would be low, as footfall in this area is currently not high. Moreover, many existing pedestrian trips in this area would be to/ from Broombridge and some of these will be replaced with the new stop at St. Helena's.

13.4.16. I have concerns regarding the termination of the cycle track at St. Helena's Stop. More clarity for cyclists is preferable at this location. It appears that cyclists will share space with pedestrians and would be expected to use the pedestrian crossing to access Farnham Drive. This leads to one of the main sections along the Luas corridor without any cycle track/ lane provision. It is suggested that cyclists will proceed along Farnham Drive, as this road is designated as part of the Cycle Network Plan. Notwithstanding this, there may be scope for a cycle track to be put in place through Farnham pitches. It may be possible for the soccer pitch to be relocated to the west by removing the perimeter path and having a wider path between the pitches that can be shared by pedestrians and cyclists. Should the Board agree that Farnham Drive should be used by cyclists, it may be prudent for the cycle track to cross the tram tracks on the southern side of St. Helena's stop, before proceeding to a toucan crossing of St. Helena's Road to the east of the tracks.

13.4.17. There is another section of the corridor without cycle provision along Casement Road (south). Cycle tracks are then proposed along Patrickswell Place before there is another gap in provision along Cardiff Castle Road and through to Mellowes Road. Along Mellows Park, there are no cycle tracks when there would appear to be ample room. It should be noted that Casement Road is designated as a secondary route on the Cycle Network Plan.

13.4.18. There also appear to be instances where cycle tracks/ paths are quite narrow in locations where there are no apparent pinch points. I recommend the attachment of a condition that cycle tracks should not be reduced when there is scope for minimum width to be achieved. I also note the use of advanced cycle stop lines in certain locations when the Cycle Design Manual states that these do not remove conflict with motor vehicles and are therefore unlikely to be an attractive proposition for a range of cycle users.

13.4.19. Overall, I consider that provision for cyclists is less than satisfactory and represents one of the main outstanding problems with the proposed scheme. I accept that consideration is given to the Cycle Network Plan in the selection of cycle provision, and in this regard, the proposals for St. Margaret's Road appear to meet the required standards for its designation as a primary radial route. I also note that there is no cycle provision to/ from the park and ride.

13.4.20. Having regard to the above, I recommend that the condition is attached to the Railway Order requiring the applicant to prepare a Luas Finglas cycle strategy. This should look at reassessing junction designs and consider cycle track provision in proximity to the Luas alignment.

Tram Users

13.4.21. As noted above, the existing population within 1km of proposed stops (CSO, 2022) is 17,892 for Broombridge, 19,550 for St. Helena's, 19,166 for Finglas Village, 17,676 for St. Margaret's, and 14,874 for Charlestown. In the opening year 2035, Luas Finglas will deliver an increase of 1.3 million low carbon public transport trips per annum, increasing to 1.8 million in 2050. Passengers will experience public transport journey time savings of approximately 12% between the Finglas area and the city centre during AM peak hour. In comparison to the private car, there will be savings of over 30% during congested peak periods. These figures justify the need for the proposed scheme.

13.4.22. From the perspective of public realm and the street environment, the interface that tram users will have with the system will be at tram stops. As noted above, tram stops will emerge as transport hubs and as centres for the local community. Footfall will increase and these area can evolve as destinations in their own right.

13.4.23. The Urban Integration Report appended to the EIAR describes the context of each of the four tram stops. At the northern end, the Charlestown terminus is set in the context of a large road junction, overlooked by existing and proposed new apartment development. Luas Finglas provides an opportunity for traffic calming and new soft landscaping, improving the quality of the local environment. St. Margaret's stop is characterised by the adjacent pedestrian, cycle, and car movement patterns, with particular attention paid to integration of cycling infrastructure. Finglas Village is located at the Local Authority offices, community sports centre, and preschool facility, and is contextualised as a suburban node. St. Helena's is primarily parkland, and the edge detail of the hard paving is broken down to acknowledge the transition to the adjacent grassland.

13.4.24. The Urban Integration Report illustrates the design precedent for each of the stops, including cultural analysis, user movement patterns and design zoning. Rendered views are produced for each of the stops. Design challenges are also considered, such as the specific mobility needs and concerns of women. The Jan Gehl observation studies were used as valuable data and insights to inform the final layout of stops, ensuring that the design of public spaces and the light rail system would be safe, inclusive, and responsive to the needs of the community.

13.4.25. In general, I consider that a thorough exercise has been carried out to determine the location of stops within catchments and local design and layout having regard to surrounding uses. Each stop has a different character and all have the potential to develop over time as active hubs. At the northern end, the Charlestown stop will serve high density residential development currently under construction, as well as the Charlestown Shopping Centre which can become a destination at the end point of the line. The reconfiguration of the major junction will reduce traffic dominance and allow for a better pedestrian experience. As noted above, the junction may be better designed as the "cyclops" version and TII has agreed to consider this at detailed design stage.

13.4.26. The St. Margaret's stop will develop as a mobility hub with interchange potential between trams and buses, park and ride and public transport, and between all these modes and cyclists. Pedestrian directness and safety is also critical at this location as people interchange on foot. The installation of the at-grade junction on Finglas road should assist in this regard.

13.4.27. The Finglas Village stop will also reduce traffic dominance and the car free civic plaza will act as a focal point for the local community. Concerns about anti-social behaviour can be addressed by the natural surveillance from passing trams and the increased footfall in the area. The proposed scheme will also introduce additional greenery in an otherwise hard landscape at this location.

13.4.28. The potential for improvement to the character of the area is most apparent at the location of the St. Helena's stop. This area is devoid of activity at present. The green space is little used and there is no interconnection with the pitches on the northern side of St. Helena's Road. I have indicated above that this area should be reassessed at detailed design stage through consideration of shared surfacing on St. Helena's Road; a more open character along the southern boundary of the pitches; better consideration of pedestrian desire lines; and continuation of cycle infrastructure. It is noted in the Urban Integration Report that the reference design will form the basis for tender specifications and detailed design stages. The review process will be concluded with a series of comment/response logs which will form the basis for the development of the urban realm detailed design proposals at the next design stage of the project. The detailed design stage will integrate all further design developments and revisions including further stakeholder consultation comments. This should include any conditions/ requirements of the Railway Order pertaining to this area. To inform this process, I consider that the applicant should prepare a public realm and access strategy for this area.

13.4.29. I have some concerns with the proposed removal of the pedestrian access ramp at Bloombridge Station. However, I understand that it is not possible to maintain this ramp having regard to the spatial and track parameters of the new Luas bridge over the canal and railway. TII and the Luas Operator plan to maintain lifts to a high standard of service to ensure the lifts provide the linkage needed

<u>Access to Commercial Premises</u>

13.4.30. Access to commercial premises is a recurring issue within submissions from businesses and other organisations located along the proposed light rail corridor. The compulsory acquisition of land will also affect the operation of certain businesses along the route, and this is addressed in further detail in Section 16 below. This section addresses the issues raised regarding access arrangements

during the construction and operational phases of the proposed scheme for deliveries, customers and staff members.

13.4.31. Clearly, a scheme of this nature will cause disruption and inconvenience for adjoining businesses during the **construction phase**. The roadway is the main point of access for businesses and other organisations along Broombridge Road, St. Margaret's Road and Mellowes Road and the main construction phase is likely to last approximately 3.5 years. The main construction activities will involve site preparation and clearance works, installation of light rail infrastructure, road and street upgrades, and construction site decommissioning, including the removal of all construction facilities and equipment. Impacts will include temporary traffic diversions or lane restrictions and disruption to footways, car parks and other areas.

13.4.32. Access will be maintained to adjacent businesses, residences and community facilities during the construction period. In addition, the proposed scheme will be constructed in sections and therefore businesses within each section will not be directly impacted for the full 3.5 years of the main construction phase. A Construction Environmental Management Plan (CEMP) will be prepared for the proposed scheme, and this will contain mitigation measures to ensure that disruption and nuisance are kept to a minimum.

13.4.33. A Construction Traffic Management Plan (CTMP) forming part of the CEMP will identify opportunities for the maximum movement of people during the construction phase with access being maintained for emergency vehicles. Temporary traffic management measures will be included to minimise the impacts during peak periods and safe routes past works areas will be provided for pedestrians and cyclists. TII will liaise with local authorities, An Garda Síochána and residents and businesses prior to all road closures and diversions.

13.4.34. In general, I consider that the construction works can be adequately managed so that significant effects on the road and street environment are minimised. Impacts on businesses are an inevitable consequence during construction and it is incumbent on the applicant to minimise these impacts to the greatest extent possible. I note that all temporary traffic measures to facilitate the works will be undertaken in accordance with Department of Transport's 'Traffic Signs Manual, Chapter 8 Temporary Traffic Measures and Signs for Roadworks' (DTTAS 2019a) and

associated guidance. Furthermore, general traffic redistribution is not expected to be a significant issue during construction, and emergency access will be maintained for emergency vehicles along the proposed scheme throughout the construction phase. Any impact during construction will therefore only be temporary, affecting commercial premises along the route for a relatively short period of time.

13.4.35. The main objections from businesses along the proposed scheme relates to impacts during the **operational phase**. Businesses/ facilities that object to the potential impacts of the proposed scheme on their operation include Aldi Stores, An Post, Appian Holdings, Atlas, Brooks Building Supplies (Downshire), Colorman, Fashionflo, HPC Sales, Lidl, and Murdock Builders Merchants. A number of other business are concerned at the loss of parking outside their businesses. Issues have also been raised along the Luas corridor concerning vehicular access. I consider that many of these are issues that can be addressed between the applicant and the parties on an ongoing basis. TII has indicated that it will continue to liaise with relevant bodies and will work with developers subject to the conclusion of the planning process.

13.4.36. One business that has raised particular concerns is Fashionflo on Broombridge Road. It is submitted that the proposed development will have serious implications for access to the site and will undermine the viability of the site for employment. In the event that the Board is minded to confirm/ grant the Railway Order, It is requested that the emerging alternative solution (in line with the proposals set out in Transport Insight's report) be conditioned as part of the Railway Order, rather than be subject to a separate planning application, the outcome of which is unknown. I agree that no part of the proposed scheme, including proposed access arrangements to businesses, should be reliant upon a separate planning application. A condition reflecting same should therefore be attached, as suggested.

13.4.37. On the whole, I recognise that the road and streetscape is being radically altered and businesses along Broombridge Road and St. Margaret's Road in particular are amongst those who are likely to the most affected by the proposals. Businesses are critical to the functioning of the city and must be facilitated as best as possible through construction and operational stages. Whilst businesses and other facilities along the Luas corridor will experience a general reduction of vehicular access for parking and deliveries, this will be outweighed by the benefits to these businesses

and facilities from an improved public realm and better footpaths, as well as improved public transport access.

Private Cars

13.4.38. It is considered that the impact on general traffic will not be significant notwithstanding the nature, scale and location of the proposed scheme. This is mainly due to the proposed alignment, which for large parts, travels through linear green spaces.

13.4.39. The main sections of the tram alignment adjoining the public road are along Broombridge Road and St. Margaret's Road (R104). The distance along Broombridge Road is approximately 310m and along St. Margaret's Road is approximately 740m. The proposed scheme will also travel along Mellowes Road (R103) for approximately 130m. Public roads will be crossed at Ballyboggan Road, Tolka Valley Road (R102), St. Helena's Road, Wellmount Road, Cappagh Road, and Finglas Road (R132).

13.4.40. The main objections to the proposed scheme from the point of view of the private motorist were mostly of a local nature and related to issues of access and parking at individual properties. There were also concerns regarding the redistribution of traffic as a result of the proposed scheme and the extent of traffic assessment carried out.

13.4.41. I consider that the level of traffic surveying and assessment is appropriate for the proposed scheme. The NTA's East Regional Model (ERM) was used for strategic transport assessment and a Local Area Model (LAM) was used to provide a more detailed understanding of traffic movement within the study area. A microsimulation model was then developed for the area to the northern end of the Luas Finglas alignment where there is likely to be the largest interaction between the Luas and road infrastructure during operation.

13.4.42. The majority of junctions will continue to operate well within capacity in AM peak with the proposed scheme in place. Junctions with capacity issues would operate with a V/C ratio of above 100% in both the Do Something and Do Nothing scenarios. The conclusion is reached in the EIAR that the potential impact of redistributed traffic on the surrounding road network would not be significant. I refer to Section 5.4.2 of DMURS (2019), which recognises that a certain level of traffic congestion is an

inevitable feature within urban networks and junctions may have to operate at saturation levels for short periods of time during the peak hours of the day.

13.4.43. The main benefit from the proposed scheme for private motorists will be the park and ride facility. This will be located at the northern end of the scheme in proximity to the St. Margaret's tram stop and will contain 350 spaces. The P&R will be accessed from North Road (R135), which links directly to Junction 5 of the M50 and the N2/ M2. Junction 5 is approximately 750m from the access to the P&R.

13.4.44. Essentially, the P&R will have the effect of extending the catchment of the Luas further into north Co. Dublin. Motorists can undertake mix-modal journeys by parking in the P&R and using the tram to carry out the next leg of their journey. Cycle parking at the P&R will also offer motorists the choice of cycling their own bicycle stored at the P&R. In theory, the P&R would intercept traffic on the N2/M2 before congestion begins to form in the AM peak.

13.4.45. In general, I consider that the impacts on private car users have been kept to a minimum. The proposed park and ride, tram, cycle and pedestrian infrastructure supplemented by traffic calming, should be of a quality to encourage a modal shift away from the private car and this should satisfy what is essentially one of the main of objectives of the proposed scheme. Reductions in traffic will have a positive impact on the environment and it has been adequately demonstrated that the surrounding road network has capacity to accommodate redistributed traffic resulting from the proposed scheme.

13.5. Impact on Residential Amenity

13.5.1. A scheme of this nature has the potential to impact on residential amenity, most notably through its construction phase. The effects of noise, air quality and construction traffic are assessed in the EIA and appropriate mitigation measures are put forward to minimise impacts on population and human health. It is concluded that the overall impact of the proposed scheme will be adverse and short term during the construction phase and generally positive during the operational phase. Benefits to residential amenity will occur from improved air quality and noise standards, a reduction in traffic congestion and better connections, particularly for disadvantaged groups.

13.5.2. Clearly, the most significant impact on residential amenity will be the permanent acquisition of residential land for the operation of the proposed scheme and temporary acquisition of residential land during construction. The proposal will therefore impact on the affected landowners. In addition, the proposed scheme will impact on existing access arrangements along the tram alignment.

13.5.3. The actual amount of residential land requirement for a project of this nature through an urban area is not substantial, owing mainly to the use of existing roads and green spaces. Some green space adjacent to Wellmount Parade, which does not appear to be taken in charge, will be permanently acquired. Private rights of way from St. Margaret's Road to St. Margaret's Court may be extinguished. Other residential properties to be affected from permanent acquisition are No's. 1 & 12 Raven's Court (part of gardens), part of the common area at Raven's Court, No. 174 North Road (part of garden), No. 234 McKee Avenue (part of garden), 1-4 St. Margaret's Court (part of ground/ driveway), 15 & 17 St. Margaret's Road (part of garden/ driveway), 1 & 2 McKelvey Road (part of garden/ driveway), No's. 19, 21, 23, 33, 35 St. Margaret's Road (part of garden/ driveway), No. 1A McKelvey Avenue (part of garden). These properties will mostly be affected by temporary acquisition adjoining the area to be permanently acquired.

13.5.4. I consider that the proposed scheme will not give rise to significant impacts on adjoining residential amenity during the operational phase of the proposed scheme. The impacts on residential amenity that will occur, will be offset by a reduction in traffic and boundary reinstatement works. The loss of land and the setting back of the boundary is addressed further in the CPO section of this report. Objections to the CPO element of the proposed scheme have been submitted on the basis of residential amenity impacts. For the most part, the land to be permanently acquired consists of narrow strips and temporary acquisitions are required behind these areas. The issue of property devaluation is a matter for the arbitration process.

13.5.5. I would also be of the opinion that the proposed works during the construction phase will not affect the amenity of local residents to a significant degree. As noted in the EIA and AA sections below, mitigation measures will be implemented during the construction phase of the proposed scheme. TII state that local arrangements will be made on a case by case basis to maintain continued access to homes and

businesses affected by works. Access will be maintained for emergency vehicles along the proposed scheme throughout the construction phase.

13.5.6. As noted, the Compulsory Purchase Order is assessed further under Section 16 below under the four criteria of Development Plan compliance; community need; suitability of land to meet that need; and alternatives. From a residential amenity perspective, however, I consider that the lands to be temporarily and permanently acquired will have no significant impact on the residents of the properties in question.

13.5.7. On balance, I consider that the proposed scheme will have positive impacts on residential amenity through the general improvement to the street environment and increased levels of passive surveillance. Residential areas along the Luas corridor will then become healthier, safer and better places to live. This substantially outweighs the negative impacts of the proposed scheme which will mostly be short term and concentrated in the construction phase. Over time, as landscaping matures, any adverse impacts during the operational phase will become less perceptible.

13.6. Ecological Impacts

13.6.1. The ecological impacts of the proposed scheme are addressed in the Biodiversity section of the EIA in Section 14.9 below. In addition, the Appropriate Assessment in Section 15 addresses the effects of the proposal on European sites. Potential impacts on biodiversity could occur from vegetation and tree removal; construction and earthworks; drainage and additional silt/ pollutant release into drainage network; lighting during construction and operation; noise and vibration; and invasive species. The Department of Housing, Local Government and Heritage highlight the potential for adverse effects on otter frequenting the section of the Royal Canal adjacent to Broombridge Station, and on the ex-situ winter season usage by light bellied brent goose of playing fields in the Farnham Drive area of Finglas.

13.6.2. However, it is concluded in the EIA that, subject to conditions, no significant direct, indirect or cumulative adverse effects on water quality, habitats and species are likely to arise. Mitigation measures will be put in place to protect the ecological integrity of the site during the construction phase and an Otter Derogation Licence Application was granted on 31st October 2024. It has also been ascertained in the

Appropriate Assessment that the proposed development, individually or in combination with other plans or projects would not adversely affect the integrity of any European site in the zone of influence, in view of these sites' Conservation Objectives. I would be satisfied that the overall ecological surveying effort has properly informed the environmental assessment of the proposed scheme.

13.6.3. The main issues raised in submissions relating to biodiversity concerns the loss of trees and green space. However, this will be compensated through additional planting, landscaping and public realm works. These are illustrated on the landscaping drawings accompanying the application. As required by the Department of Housing, Local Government and Heritage, all mitigation measures to avoid adverse effects on flora, fauna and important habitats shall be implemented in their entirety. The measures set out in the EIAR, NIS and CEMP to avoid adverse effects should, if diligently implemented, prevent any such detrimental effects.

13.6.4. Overall, the impact of the proposed scheme on certain aspects of biodiversity is unavoidable. However, the proposed works will mostly occur within the existing built-up area and along green spaces and therefore any species would be habituated to human disturbance. Additional planting will compensate for vegetation removal, which will take place outside the bird nesting season. Measures will also be put in place to avoid mobilisation of sedimentary material during construction and to prevent the spread of invasive species. There will be beneficial impacts on surface water quality due to the inclusion of SuDS measures.

13.7. Consultation

13.7.1. It was contended within submissions that the consultation process has been inadequate for a project of this complexity and that further consultation is warranted along with the holding of an oral hearing.

13.7.2. Following my recommendation, the Board decided that the holding of an oral hearing was not required in this case. It was decided that there is sufficient written evidence on file to enable an assessment of issues raised. The Board also decided to invite further submissions on TII's response to submissions received pursuant to Section 47D(1) of the Transport (Railway Infrastructure) Act 2001, (as amended). It should be noted that the holding of hearings is a discretionary function of the Board.

13.7.3. A total of 25 submissions were received on TII's responses to the issues raised by objectors and within original submissions to the Board. From a general consultation perspective, there were objections to the time given for responses, the decision itself not to hold an oral hearing, and the meaningfulness of consultations. It is considered by certain parties that no detailed design is available.

13.7.4. From the outset, it should be noted that three rounds of non-statutory consultation were held, and a number of consultation tools were used, including a dedicated website, virtual consultation room, booklet, leaflet drops, response form and advertisements in local papers. Design alternatives were examined during the different phases of public consultation and route alternatives were considered during the design development of the proposed scheme and informed by public consultation and survey data. TII intend to continue collaboration in advance of, and during, the subsequent construction stage. Construction works will therefore be carried in consultation with local residents.

13.7.5. The statutory process has made available for public review all application information as set out in legislation, as well as allowing for submissions in relation to the proposals to the Board. All owners as per Land Registry are set out in the CPO schedule, and site notices were erected and newspaper notices published. Information was also sent out to all recorded interested parties.

13.7.6. Overall, I am satisfied that extensive public consultation and stakeholder engagement was undertaken. The applicant has clearly engaged with all third parties, residents, businesses, community groups and other organisations and has amended the scheme accordingly where it has been feasible to do so and in response to concerns raised. I am also satisfied with the level of clarity provided within application and statutory consultation documentation and consider that the applicant has complied with the requirements of the Aarhus Convention in its relevance to the statutory process and note that such requirements are not relative to any non-statutory consultation which is carried out at the discretion of the applicant.

13.8. Other Issues Raised in Submissions

13.8.1. The following table sets out a summary of the issues raised in submissions and the response to same:

Issue	Observer Number:	Response/ Main References (Not Exhaustive)
Zoning – non compliance	6, 8, 10, 12	- DCC consider that proposed scheme would be consistent with the zoning objectives for the area. - TII note that proposed scheme is not precluded under zoning objectives. - There are specific polices within all levels that support the delivery of Luas Finglas. - I also note that the lands in question are the subject of masterplanning. Lands within the Ballyboggan Draft Masterplan are not zoned for residential purposes but it is anticipated that they will through the variation process.
Impact on business operation	2, 3, 4, 5, 6, 8, 10, 12, 15, 17, 22, 29	See Section 13.4, 16.8. & 16.9
Construction impacts including timescale	2, 4, 15, 25	See Section 13.4 and EIA. Main constructions works will take place of a 3.5 year period. However, works will be carried out in sections and will not affect the concerned properties for the entire construction period.
Access, Deliveries and Rights of Way	1, 2, 3, 4, 5, 6, 8, 10, 12, 15, 16, 20, 22, 25, 29, 34, 38	See Section 13.4, 16.8. & 16.9 and Section 14.11 of the EIA.
Lack of design detail	1, 2, 6, 8, 10, 15, 25, 29, 34, 38	Refer to TII's response to submissions. Under Urban Integration Report, detailed design stage will integrate all further design developments and revisions including further stakeholder consultation comments. As noted by TII, While the EIA provides a comprehensive analysis of the expected impacts, detailed property-specific matters are

		typically addressed at later stages through mechanisms such as the detailed design phase, mitigation plans, and direct engagement with affected parties.
Traffic study/ impacts	1, 4, 6, 8, 10, 12, 22, 34, 38	Refer to Section 14.11 of EIA. I am satisfied with the qualitive assessments carried out on pedestrian and cycle infrastructure and bus services, and the quantitative assessments in terms of people movement, public transport performance, and on general traffic on the surrounding road network. There is potential for significant positive impacts on traffic and transport during the operational phase from improvements for walking, cycling, public transport and people movements, and reductions in general traffic and associated GHG emissions.
Non compliance with Jamestown Masterplan	1, 15, 29, 38	See Section 5.14 and 16.8. I consider that the proposed scheme will help to achieve the visions and objectives of the Jamestown Masterplan.
Pedestrian/ active travel access	1, 2, 12, 16, 34	See Section 13.4, 16.8. & 16.9; Section 14.11 of the EIA; and Urban Integration Report. Pedestrian access will be facilitated directly from St. Margaret's Road/ Broombridge Road and safe route will be provided past works areas.
Scale/ duration of acquisition	1, 5, 6, 8, 10, 12	See Section 16.7 Proposed temporary land take will be limited to the duration required in completing these specific works and will be coordinated with the stakeholder in advance.
Impact on development capacity/ potential	2, 8, 15, 22, 29	See Section 16.8

Loss of parking	2, 5, 6, 8, 10, 12, 22, 34, 13, 14, 18, 21, 23, 24, 26, 27, 28, 30, 31, 32, 33	Loss of parking will be partly compensated by new parking and temporary parking will be provided during construction. Loss of parking should viewed in the context of significant increases in public transport accessibility.
Boundary impacts/ road frontage	2, 6, 8, 10, 12, 17	See Section 16.8. New boundary walls and fences will be provided and any relocation will be agreed with landowner as part of the compensation agreements.
Loss of green space	8, 18, 19, 21, 23, 27, 28, 30, 31, 32, 33	Loss of green space in Raven's Court will be mitigated by a comprehensive landscaping plan for the estate to be agreed with residents at detailed design stage.
Safety and access	8, 9, 13, 14, 18, 19, 21, 23, 24, 26, 27, 28, 30, 31, 32, 33	Mitigated during construction through implementation of Construction Traffic Management Plan. Proposed scheme has been designed to ensure that both drivers exiting Ravens Court and pedestrians crossing the Luas line have appropriate visibility in accordance with relevant design standards.
Noise and vibration	8, 13, 14, 18, 19, 21, 23, 26, 27, 28, 30, 31, 32, 33	See Section 14.10 of EIA. Following mitigation, there will be moderate to significant impacts for brief periods when construction works are immediately adjacent to sensitive properties.
Boundary treatment	13, 37	See Section 16.8. New boundary walls and fences will be provided and relocation will be agreed with landowner as part of the compensation agreements.

Increased footfall and security/ anti-social behaviour.	8, 9, 14, 21, 26, 32, 35, 37	Concerns about anti-social behaviour can be addressed by the natural surveillance from passing trams and the increased active travel along the corridor.
Link to Metro	8, 31, 32	Currently no policy supporting the extension of the Luas Green Line to Ballymun or Metrolink and this is beyond the scope of the current Railway Order application.
Construction impacts/ disruption	9, 13, 14, 26, 32, 35	See Section 14 – EIA. A Construction Environmental Management Plan (CEMP) will be prepared for the proposed scheme, and this will contain mitigation measures to ensure that disruption and nuisance are kept to a minimum.
Pedestrian/ disabled access	11, 31, 37, 39	Proposed scheme designed in accordance with the principles of DMURS and the National Disability Authority (NDA) 'Building for Everyone: A Universal Design Approach' (NDA, 2020).
Improved cycle provision/ pedestrian/ cyclist conflict	11, 39	See Section 13.4. Intention at detailed design stage to revisit the design of cycling infrastructure to align it closer to the Cycle Design Manual 2023.
Pedestrian crossing facilities/public realm/desire lines	11, 31, 35, 39	See Section 13.4. TII submit that safety at pedestrian crossing could be improved at detailed design stage.
Junction reconfiguration	11	TII state that cyclops junctions can be considered for the Finglas Road / North Road and the Charlestown junction at detailed design stage.
Privacy	13, 37	TII confirm that new boundary walls and fences will be provided and any relocation will be agreed with landowner as part of the compensation agreements.

Broombridge as less compact bus stop	36	TII confirm that bus turning area at Broombridge will be reconfigured to retain and enhance opportunities for intermodal transfers. I consider that it is in the interests of all transport operators and passengers that efficient interchanges are facilitated. TII will continue to engage with NTA and BusConnects project teams to ensure project coordination in terms of bus stop location.
P&R bus transfer facilities	36	TII stated that the current design of the Park & Ride facility does not include a bus interchange; however, proposed scheme design does not preclude such provision should such a demand be identified. I note that the proposed P&R is within walking distance of the future sustainable mobility hub.
Accessible documentation	39	TII state that certain images could not be adequately described by text, and a text only version of the document was available on demand. Progress updates were provided by Luas team members in direct bilaterial meetings with Voice of Vision Ireland, and I note TII's commitment to continue to engage in dialogue with DCC, FCC and relevant stakeholders including VVI, National Disability Authority and the Luas Users Group throughout all project phases.
Public lighting	11	Public lighting locations, maintenance, electrical supply, etc. for the proposed scheme will be addressed at detailed design stage.
Flyover bridge along Broombridge Road	12	See Section 16.9. Proposal would be excessive when alternative access to the premises can be provided.
Proposed access from McKee Avenue	15, 29	See Section 16.9. Proposed alternative access from McKee Avenue is in line with the masterplan for Jamestown.

Access/ security at Jamestown Business Park	16	TII confirms their intention to engage in discussions during the detailed design stage to find a suitable long-term solution with regard to the location of the security hut and security provision within the Jamestown Business Park.
Alternative route along Finglas Road	19, 30	See Sections 14.6 and 16.6.

Table 13.8 – Summary of Issues Raised in Submissions

14.0 Environmental Impact Assessment

14.1. Statutory Provisions

14.1.1. The Transport (Railway Infrastructure) Act 2001 (as amended by the 2006 Planning and Development (Strategic Infrastructure) Act) provides for the making of an application for a Railway Order to An Bord Pleanála. The European Union (Railway Orders) (Environmental Impact Assessment) (Amendment) Regulations 2021 (S.I. No. 743 of 2021) gives effect to the transposition of the EIA Directive (2011/92/EU as amended by Directive 2014/52/EU).

14.1.2. Section 37 of the 2001 Act, as amended, (including by SI 743/2021) requires that the application be accompanied by a report on the likely effects on the environment. Section 42A requires that in carrying out an environmental impact assessment the Board shall, where appropriate, co-ordinate the assessment with any assessment under the Habitats Directive. Section 42B states that the Board shall reach a reasoned conclusion on the significant effects on the environment of the activity to which the application relates.

14.2. EIA Structure

14.2.1. This section of the report comprises the Environmental Impact Assessment (EIA) of the proposed development in accordance with the provisions of Section 37(3)(e) and Section 39 of the Transport (Railway Infrastructure) Act 2001 (as amended) and associated Regulations, which incorporate the European Directives on Environmental Impact Assessment (Directive 2011/92/EU as amended by

2014/52/EU). The applicant must submit an EIAR with the application for a Railway Order to the Board as required by Section 37(3)(e) of the Transport (Railway Infrastructure) Act, 2001 (as amended).

14.2.2. Sections 39 of the Transport (Railway Infrastructure) Act, 2001 (as amended), specifies the information that must be provided in the EIAR that accompanies a Railway Order application. The European Union (Railway Orders) (Environmental Impact Assessment) (Amendment) Regulations 2021 (S.I. No. 743/2021) amend the 2001 Act, to include the requirements of Directive 2014/52/EU. In the case of this application for a Railway Order, EIA is the process by which the likely significant effects on the environment of the proposed scheme are assessed by the Board. Article 1(2)(g) of the EIA Directive defines EIA as a process consisting of the preparation of an Environmental Impact Assessment Report (EIAR) by the applicant, the carrying out of consultations, the examination of the EIAR and relevant supplementary information by the Board, the reasoned conclusions of the Board and the integration of the reasoned conclusion into the decision of the Board.

14.2.3. Information required under EIA Directive includes a description of the factors likely to be significantly affected by the project. This is reflected in Section (1)(b)(ii) of the Transport (Railway Infrastructure) Act 2001 (as amended) which requires a description of the likely significant effects of the proposed railway works on the environment. Under Section 2, the applicant shall further ensure that an environmental impact assessment report, in addition to and by way of explanation or amplification of the specified information referred to in subsection (1), contains any additional information specified in Annex IV to the EIA Directive relevant to the specific characteristics of the particular railway works, or type of railway works, proposed and to the environmental features likely to be affected.

14.2.4. This EIA section of the report is divided into two sections. The first section assesses compliance with the requirements of the Directive and Transport (Railway Infrastructure) Act 2001 in term of the requirements on the contents of an EIAR. The second section provides an examination, analysis and evaluation of the development and an assessment of the likely direct and indirect significant effects of it on the following defined environmental parameters, having regard to the EIAR and relevant supplementary information:

- population and human health,
- biodiversity, with particular attention to species and habitats protected under the Habitats Directive and the Birds Directive,
- land, soil, water, air, and climate,
- material assets, cultural heritage, and the landscape,
- the interaction between the above factors, and
- the vulnerability of the proposed development to risks of major accidents and/or disasters.

14.2.5. It also provides a reasoned conclusion and allows for integration of the reasoned conclusions into the Board's decision, should they agree with the recommendation made.

14.3. Compliance with the Requirements of the EIA Directive and the Transport (Railway Infrastructure) Act 2001 (as amended)

14.3.1. Compliance with the requirements of the EIA Directive and the Transport (Railway Infrastructure) Act 2001 (as amended) is set out below.

Information required under EIA Directive and the Transport (Railway Infrastructure) Act 2001 (as amended)		
EIA Directive	**Transport (Railway Infrastructure) Act 2001 S39 (as amended by Regulation 6(a) of S.I. No. 743/2021)).**	**Compliance**
EIA Directive Article 5(1)		
(a) A description of the project comprising information on the site, design, size and other relevant features of the project.	1)(b)(i) a description of the proposed railway works comprising information on the site, design, size and other relevant features of the proposed works	The proposed development is comprehensively described in Section 5 of the EIAR and depicted in the associated drawings. Information is included on the site, design, size and features of the proposed Luas Green Line extension from its current terminus at Broombridge

		to a new proposed terminus at Charlestown. Key features of the proposed scheme will include grass track (2.9km), embedded track (0.7km) and plinth/ structure track (0.4km); 4 no. Luas stops at St. Helena's, Finglas Village, St. Margaret's Road and Charlestown; 2 no. bridge structures over the railway line/ canal and over the River Tolka; and 12 no. at-grade signalised road junctions and 13 no. at-grade uncontrolled junction; new pelican, toucan, uncontrolled road and uncontrolled alignment crossings; protected (3km) and on-road (100km) cycle lanes; 3 no. substations; a new stabling facility at Broombridge; a 350 space P&R facility; and 3 no. uncontrolled vehicle accesses across the alignment. The EIAR also describes the construction, reinstatement and operation phases of the development. I am satisfied that adequate detail has been provided to enable decision making.
(b) A description of the likely significant effects of the project on the environment.	(1)(b)(ii) a description of the likely significant effects of the proposed railway works on the environment. (1)(b)(iii) the data required to identify and assess the main effects which the proposed railway works are likely to have on the environment.	An assessment of the likely significant direct, indirect, and cumulative effects of the development is carried out for each of the technical chapters of the EIAR (Chapters 7-24). I am satisfied that the assessment of significant effects is comprehensive and robust and enables decision making.

(c) a description of the features of the project and/or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment.	(1)(b)(iv) a description of any features of the proposed railway works, and of any measures envisaged, to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment.	These are included in each of the technical chapters of the EIAR and the associated appendices. They are brought together in Chapter 25 of the EIAR and in the CEMP.
(d) a description of the reasonable alternatives studied by the developer, which are relevant to the project and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the project on the environment.	(1)(b)(v) a description of the reasonable alternatives studied by the applicant which are relevant to the proposed railway works and their specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the railway works on the environment.	Chapter 4 of the EIAR considers alternatives in respect of do nothing, strategic alternatives, route options, emerging preferred route, preferred road, preferred route following consultation and further design changes, technological alternatives, and consideration of construction phase alternatives. This section provides the main reasons for selecting the proposed option and a comparison of environmental effects, taking account of environmental impacts, alongside other factors including economy, integration, safety, accessibility and social inclusion. I consider, therefore, that the description of alternatives is reasonable, in the context of the proposed development, and satisfactory.
EIA Directive Annex IV (Information for the Environmental Impact Assessment Report)		
1. Description of the project, including in particular: (a) a description of the location of the project; (b) a description of the physical characteristics of the whole project, including, where relevant, requisite demolition works, and the land-use	(2) The applicant shall further ensure that an environmental impact assessment report, in addition to and by way of explanation or amplification of the specified information	As above Chapter 6 of the EIAR provides an overview of the construction activities and methods for the proposed scheme. The main characteristics of the operational phase as set out within each of the technical

requirements during the construction and operational phases; (c) a description of the main characteristics of the operational phase of the project (in particular any production process), for instance, energy demand and energy used, nature and quantity of the materials and natural resources (including water, land, soil and biodiversity) used.	referred to in subsection (1), contains any additional information specified in Annex IV to the EIA Directive relevant to the specific characteristics of the particular railway works, or type of railway works, proposed and to the environmental features likely to be affected.	chapters. I consider that the construction and operational phases of the proposed scheme are properly described with adequate detail provided to enable informed decision making.
(d) an estimate, by type and quantity, of expected residues and emissions (such as water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation) and quantities and types of waste produced during the construction and operational phases.	(2) The applicant shall further ensure that an environmental impact assessment report, in addition to and by way of explanation or amplification of the specified information referred to in subsection (1), contains any additional information specified in Annex IV to the EIA Directive relevant to the specific characteristics of the particular railway works, or type of railway works, proposed and to the environmental features likely to be affected.	An assessment of any expected residues and emissions and quantities and types of waste produced during the construction and operational phases can be found in the technical chapters of the EIAR and associated appendices. This includes a C&D Resource and Waste Management Plan, a Surface Water Management Plan and an Invasive Species Management Plan. I consider expected residues and emissions are properly described and assessed to enable informed decision making.
2. A description of the reasonable alternatives (for example in terms of project design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an	(1)(b)(v) a description of the reasonable alternatives studied by the applicant which are relevant to the proposed railway works and their specific characteristics, and an indication of the	As above

indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.	main reasons for the option chosen, taking into account the effects of the railway works on the environment	
3. A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the project as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.	(2) The applicant shall further ensure that an environmental impact assessment report, in addition to and by way of explanation or amplification of the specified information referred to in subsection (1), contains any additional information specified in Annex IV to the EIA Directive relevant to the specific characteristics of the particular railway works, or type of railway works, proposed and to the environmental features likely to be affected.	The baseline environment is set out for each environmental factor under the relevant chapter. This includes the context and character of the baseline, existing transport infrastructure, community/ social infrastructure and economic facilities. A do-nothing scenario is presented in each chapter to assess the likely evolution of each environmental factor without implementation of the project. I consider that sufficient information and detailed assessment have been provided in this regard to enable informed decision making.
4. A description of the factors specified in Article 3(1) likely to be significantly affected by the project: population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage,	(1)(b)(ii) a description of the likely significant effects of the proposed railway works on the environment (2) The applicant shall further ensure that an environmental impact assessment report, in addition to and by way of explanation or amplification of the specified information referred to in subsection (1), contains any	As above.

including architectural and archaeological aspects, and landscape.	additional information specified in Annex IV to the EIA Directive relevant to the specific characteristics of the particular railway works, or type of railway works, proposed and to the environmental features likely to be affected.	
5. A description of the likely significant effects of the project on the environment resulting from, inter alia: (a) the construction and existence of the project, including, where relevant, demolition works; (b) the use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources; (c) the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste; (d) the risks to human health, cultural heritage or the environment (for example due to accidents or disasters); (e) the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources; (f) the impact of the project on climate (for example the nature and	2) The applicant shall further ensure that an environmental impact assessment report, in addition to and by way of explanation or amplification of the specified information referred to in subsection (1), contains any additional information specified in Annex IV to the EIA Directive relevant to the specific characteristics of the particular railway works, or type of railway works, proposed and to the environmental features likely to be affected.	As above

magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change; (g) the technologies and the substances used. The description of the likely significant effects on the factors specified in Article 3(1) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the project. This description should take into account the environmental protection objectives established at Union or Member State level which are relevant to the project		
6. A description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.	(2) The applicant shall further ensure that an environmental impact assessment report, in addition to and by way of explanation or amplification of the specified information referred to in subsection (1), contains any additional information specified in Annex IV to the EIA Directive relevant to the specific characteristics of the particular railway works, or type of railway works, proposed and to the environmental features likely to be affected.	Forecasting methods and/or evidence to identify and assess significant effects are included in the EIAR, as required for relevant environmental topics. Technical difficulties are identified where necessary, and I am satisfied that there are no significant deficiencies that prevent decision making.

7. A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements (for example the preparation of a post project analysis). That description should explain the extent, to which significant adverse effects on the environment are avoided, prevented, reduced or offset, and should cover both the construction and operational phases.	(1)(b)(iv) a description of any features of the proposed railway works, and of any measures envisaged, to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment	As above
8. A description of the expected significant adverse effects of the project on the environment deriving from the vulnerability of the project to risks of major accidents and/or disasters which are relevant to the project concerned. Relevant information available and obtained through risk assessments pursuant to Union legislation such as Directive 2012/18/EU of the European Parliament and of the Council (*) or Council Directive 2009/71/Euratom (**) or relevant assessments carried out pursuant to national legislation may be used for this purpose provided that the requirements of this Directive are met. Where appropriate, this description should include measures envisaged to prevent or mitigate	(2) The applicant shall further ensure that an environmental impact assessment report, in addition to and by way of explanation or amplification of the specified information referred to in subsection (1), contains any additional information specified in Annex IV to the EIA Directive relevant to the specific characteristics of the particular railway works, or type of railway works, proposed and to the environmental features likely to be affected.	Likely significant effects of the development on the environment, arising from its vulnerability to risks of major accidents and/or disasters addressed, are described in Chapter 22 of the EIAR and are adequate to support decision making.

the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies. (*) Directive 2012/18/EU of the European Parliament and the Council of 4th July 2012 on the control of major-accident hazards involving dangerous substances, amending and subsequently repealing Council Directive 96/82/EC (OJ L 197, 24.7.2012, p. 1). (**) Council Directive 2009/71/Euratom of 25th June 2009 establishing a community framework for the nuclear safety of nuclear installations (OJ L 172, 2.7.2009, p. 18)..		
9. A non-technical summary of the information provided under points 1 to 8.	(1)(b)(vi) a summary in non-technical language of the above information.	This information has been submitted as a separate standalone document (Volume 1 – Non-Technical Summary). I am satisfied that the document is concise and comprehensive and is written in a language that is easily understood by a lay member of the public.
10. A reference list detailing the sources used for the descriptions and assessments included in the report.	(2) The applicant shall further ensure that an environmental impact assessment report, in addition to and by way of explanation or amplification of the specified information referred to in subsection (1), contains any additional information specified in Annex IV to	Sources used for the description and assessment of environmental effects are included in each technical chapter of the EIAR.

	the EIA Directive relevant to the specific characteristics of the particular railway works, or type of railway works, proposed and to the environmental features likely to be affected.	

14.4. Consultations

14.4.1. The main EIA issues raised within submissions relate to the quality of the EIAR with respect to information on design and construction methods; the assessment of environmental impacts on observer's property; design correlation with the Jamestown Masterplan; lack of opportunities for consultation; analysis of roads and traffic; and the quality of drawings for the purposes of EIA. These and other specific issues are raised in submissions relating to noise, impacts on residential amenity, impacts on biodiversity, water quality impacts, and landscape and visual impacts are addressed in detail under the relevant EIA sections below taking into account the applicant's response to same.

14.4.2. The Railway Order application has been submitted in accordance with the requirements of Section 37(1) of the Transport (Railway Infrastructure) Act 2001 (as amended and substituted). The draft Railway (Luas Finglas - Broombridge to Charlestown) Order [2024], the accompanying documentation and a copy of the newspaper notice has been served on:

- Each of the Planning Authorities in whose functional area (or any part thereof) the proposed railway works are proposed to be carried out (being Dublin City Council and Fingal County Council),
- Each of the Designated Bodies specified by the Minister for Transport pursuant to Section 39A of the 2001 Act, and
- Such other persons as directed by the Board, in accordance with Section 40(1)c of the 2001 Act described by the Bard as Prescribed Bodies

14.4.3. A copy of the newspaper notice, together with relevant extracts from the Railway Order application documents have been served on every owner and occupier of

lands referred to in the draft Railway Order. This includes relevant extracts from the AA Screening Report and Natura Impact Statement.

14.4.4. The Railway Order application also includes a SID application form, a draft of the proposed Railway Order, a plan of the proposed railway works, a book of reference, an EIAR and Appropriate Assessment Screening Report and NIS, letters of consent and support, newspaper notices, a schedule of submitted documents, list of prescribed bodies, list of landowners and occupiers, EIA Portal Notification and a schedule of planning drawings.

14.4.5. Section 1.9 of the EIAR sets out details of consultations with the public and stakeholders in accordance with the Aarhus Convention, consolidated EIA Directive requirements and the requirements of national law. Non-statutory consultation was carried out in three phases, initially in July 2020 in relation to the emerging preferred route, followed in December 2021 on the preferred route, and then for EIA scoping in April 2022.

14.4.6. The first non-statutory public consultation on the emerging preferred route took place over a period of three weeks and was supported by a programme of stakeholder and community engagement activities. Letters were sent to residents and landowners prior to an event on 28th July 2020 where the Minister for Climate Action, Communications Networks and Transport, launched the non-statutory public consultation. A Senator, TD and Councillor online briefing also took place on the day of the consultation launch, which was delivered by the Luas Finglas TII Project Manager. A press release was then issued by TII and stakeholders were contacted to request them to participate in the consultation. A leaflet drop to 10,000 local residents and businesses was undertaken and advertisements were placed in local newspapers. Promotion content was also posted on social media.

14.4.7. A total of 626 submissions were received following the non-statutory consultation period. Submissions were also received from 33 stakeholders. As a result of the non-statutory public consultation on the emerging preferred route, a number of changes were made to the proposed scheme at Mellowes Crescent, Casement Road/ Dunsink Road, Lakeglen Estate and St. Margaret's Court. The preferred route was then determined and consultations took place over an 8-week period and a total of 363 submissions were received. As with the emerging preferred route

consultation, information on the preferred route was provided via a website, virtual consultation room, booklet and response form.

14.4.8. The non-statutory consultation on EIA Scoping included an invitation to stakeholders to provide feedback on the EIA Scoping Report. A total of 19 submissions were received on the adequacy of the scope of the proposed assessment for the EIAR; any additional information that should be considered; and any additional environmental issues that should be taken into consideration in preparing the EIAR. Information and advice received from the consultation process was subsequently incorporated into the design of the proposed scheme, where possible, and addressed in the relevant chapters of the EIAR.

14.4.9. Additional consultation on particular areas of interest took place between 2020 and 2024 with more than 50 organisations, including representatives from Fingal County Council and Dublin City Council, Uisce Éireann, Iarnród Éireann, Waterways Ireland and An Garda Síochána. Consultations and meetings are still ongoing.

14.4.10. A pre-application consultation meeting took place on 26th May 2023, where the Luas project team provided the Board with an overview of the proposed scheme and an outline of key environmental issues being considered in the EIAR (ABP-315939-23). A second pre-application meeting took place on 15th March 2024 where procedural processes and matters were agreed. The Board decided to close the pre-application consultation on 11th April 2024.

14.4.11. Finally, under the statutory consultation process, interested parties and stakeholders made submissions on the proposed scheme to the Board. A total of 39 submissions were received from third parties and seven submissions were received from prescribed bodies. TII submitted a response to each of these submissions on 27th March 2015.

14.4.12. The Board decided that the proposed scheme could be assessed without recourse to an oral hearing and that this case can be dealt with adequately through written procedure. Accordingly, the Board considered it appropriate to invite submissions in accordance with Section 47D(1) of the Transport (Railway Infrastructure) Act 2001, as amended, in relation to TII's submission of 27th March 2025. In response to this invitation, the Board received a further 25 submissions.

14.4.13. Overall, I am satisfied that appropriate consultations have been carried out and that third parties have had the opportunity to comment on the proposed development and engage with the application process in advance of decision making.

14.5. Compliance

14.5.1. Having regard to the foregoing, I am satisfied that the information contained in the EIAR, and the supplementary information provided by the developer is sufficient to comply with Section 39 of the Transport (Railway Infrastructure) Act 2001 (as amended by Regulation 6(a) of S.I. No. 743/2021)).

14.6. Consideration of Alternatives

14.6.1. Chapter 4 of the EIAR considers alternatives in respect of previous studies, strategic alternatives, the do nothing scenario, alternative route options, the emerging preferred route, the preferred route, technological alternatives, and consideration of alternatives for construction. A number of alternatives were also put forward in submissions, including the use of Finglas Road or Ratoath Road and onto Cappagh Road.

14.6.2. The Railway Procurement Agency undertook two separate studies on a Luas extension from Broombridge to Finglas in 2010 and 2013. The 2010 study **"Luas Line D1 – Broombridge to Metro West via Finglas – Route Corridor Identification and Feasibility Report"** included a "spiderweb" assessment, resulting in a set of eight preferred options. The purpose of this study was to connect the unconstructed section of the Luas green line with the now abandoned Metro West. The "spidersweb" was nonetheless used for identifying the emerging preferred route and assessing the suitability of the existing roads network in accommodating a Luas corridor. The conclusions of this study informed the **"Luas Line D – Analysis of Route Options"** 2013 study, which analysed in technical detail some of the emerging corridor.

14.6.3. Strategic alternatives were assessed in the **Fingal / North Dublin Transport Study (NTA, 2015)** to identify the optimum long-term public transport solution to connect Dublin City Centre, Dublin Airport and Swords. The first stage identified a list of 25 potential public transport schemes for the area and six were shortlisted for analysis

in Stage 2. Amongst the 25 schemes was light rail from Broombridge to Finglas (Luas D1), which was eliminated from further consideration as it did not meet key project objectives of providing connectivity to Swords. The light rail option of Broombridge to Swords via the airport and Finglas was also eliminated because the estimated journey time would have been very long. An optimised Metro North was identified as the best medium and long-term transport project for the Greater Dublin Area. This option also retained the opportunity to extend Luas Cross City to Finglas.

14.6.4. Another strategic study was conducted in 2015. **'The North West Corridor Study'** on behalf of the NTA analysed the demand for transport in north-west Dublin. This study concluded that light rail was required in addition to the bus network to support the sustainable growth of the area. The full impact on demand management measures, park & ride facilities and bus network redesign were not modelled as part of this study and therefore demand levels for public transport were considered to be conservative.

14.6.5. The extension of the Luas from Broombridge into Finglas was subsequently identified in the Transport Strategy for the Greater Dublin Area (GDA) 2016 – 2035 (and its recent successor for 2022-2042), as a key measure for improving public transport connections in the area. This service would be complemented by the extension of the DART to Maynooth, BusConnects and a range of demand management measures.

14.6.6. Under the **'do nothing'** scenario, the current transport system will not increase its capacity to meet future predicted demand from population increases. Private car use will increase and associated congestion levels will cause detrimental environmental impacts. Around 50% of work trips and 42% of school / college trips from Finglas are made using private vehicles (Census 2022) and this is high when compared to the wider Dublin city and suburbs. Other consequences of the 'do nothing' scenario would be increased air, noise and GHG emissions.

14.6.7. The appraisal methodology for selection of the **emerging preferred option** includes a two-stage approach comprising Stage 1 – Preliminary Appraisal (sifting) of a long list of options and Stage 2 – Multi-Criteria Analysis (MCA) of a shorter list of feasible options. The headline criteria at preliminary appraisal stage were engineering, environment and economy. A screening analysis was also carried out on the ability

of each option to serve Finglas Village, the directness of the route, interactions with road/ junctions, and alignment. These criteria were informed by the 14 environmental aspects listed on Annex IV of the Directive 2011/92/EU as amended by the Directive 2014/52/EU. Only biodiversity, noise and cultural heritage were identified as directly influencing the development of route options.

14.6.8. At Stage 2, the common set of comparative assessment criteria are economy, integration, accessibility and social inclusion, environment, safety and physical activity. Four shortlisted route options brought forward to this stage from Broombridge to Charlestown. Route 2A (Broombridge/ St. Helena's/ Finglas Village/ Mellows Park/ Charlestown) was determined to be the most positive corridor, particularly in terms of economy and physical activity, and also for accessibility, social inclusion and safety.

14.6.9. Option 2A was identified as the **emerging preferred route** being the most direct end to end route (13 minutes), with a comparatively high benefit cost ratio, and the highest catchment per km. The disadvantaged areas west of Finglas are served and this is considered to better integrate with existing and planned public transport. There is also less interface with the R135 and it is considered safer to run the route through parklands and open spaces.

14.6.10. Following public consultation, the **preferred route** was identified. A number of key improvements from the emerging preferred route to the preferred route included an improved site layout at the depot stabling site; minor track realignments; increased footpath and cycle lane provision; realignment at Mellowes Road; relocation of stop from Mellowes Park to St. Margaret's Road; replacement car parking at St. Margaret's Court; and a new P&R at Lidl, North Road/ St. Margaret's Road. A local options assessment was also carried out for **Broombridge depot**. Four locations were assessed, with the option brought forward of expanding Broombridge stabling yard. Key environmental considerations included impact on surrounding properties, key biodiversity differentiating factors, and land risks.

14.6.11. A number of other assessments were undertaken for minor alignments along the route. The included Broombridge Road track and road layout, Tolka Valley Park, St. Helena's Stop location, Farnham Crescent Park, Casement Road and Patrickswell Place, McKee Avenue/ St. Margaret's Road junction, and Mellowes Crescent and

Court. As a result of the Mellowes Crescent and Court assessment, the route was altered to continue passed Ravens Court and through the Garda Station car park. Different options were also examined for the park & ride which result in two options being shortlisted (site adjacent to Charlestown and the chosen Lidl site). It was decided that the Lidl site worked better from a property, traffic and cost viewpoint. Micro options for this site were then explored to maximise the benefits of P&R and to allow for any future redevelopment of the Lidl lands. A number of assessment options were also considered for the Broombridge tie-in. the Royal Canal and rail bridge, the Tolka River Bridge, and ESBN substation locations.

14.6.12. Some further design changes were made following consultations. These changes were relatively small and included landscaping and drainage, roads and active travel designs, access and parking. An alternative access to Ravens Court was considered but discounted and options were assessed for a pedestrian bridge over the Royal Canal. An assessment was undertaken to identify the preferred alignment and boundary adjacent to Finglas Garda Station. The relocation of vehicle access for Finglas Garda Station onto Finglaswood Road was adopted, together with realignment of the scheme further west away from Ravens Court, and the removal of the pedestrian crossing between Ravens Court and Mellowes Road.

14.6.13. The final considerations where **technological alternatives** and **alternatives of the construction phase**. Trackform options that were assessed included embedded and street running track, grass track, and shallow track on structures. During construction, consideration was given to the location of construction compounds.

14.6.14. In general, all reasonable alternatives that are relevant to the design of the project and its specific characteristics as presented are clearly set out in the EIAR. The main reasons for the chosen options and the development of the design process are included, together with the background to the statutory planning process. I would therefore be satisfied that this section of the EIAR is sufficient to comply with the provisions of the EIA Directive; which states that an EIAR must contain *"a description of the reasonable alternatives (for example in terms of project design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects."*

14.7. Assessment of Likely Significant Effects

14.7.1. This section of the report sets out an assessment of the likely environmental effects of the proposed development under the following headings, as set out in the European Union (Railway Orders) (Environmental Impact Assessment) (Amendment) Regulations 2021:

- Population and human health,
- Biodiversity, with particular attention to species and habitats protected under the Habitats and Birds Directives (Directive 92/43/EEC and Directive 2009/147/EC respectively),
- Land, soil, water, air and climate,
- Material assets, cultural heritage and the landscape, and
- The interaction between these factors.

14.7.2. This assessment includes an examination, analysis and evaluation of the application documents, including the EIAR, the associated drawings, documents/appendices and the submissions received and identifies, describes and assesses the likely direct and indirect significant effects (including cumulative effects) of the development on the environmental parameters set out in the Regulations and the interaction of these. Each topic section is therefore structured under the following headings:

- Issues raised.
- Examination, analysis and evaluation.
- The Assessment: direct and indirect effects.
- Conclusion.

14.8. Population and Human Health

<u>Issues Raised</u>

14.8.1. Consideration should be given as to whether issues raised in submissions concerning the proposed Luas Finglas scheme, such as noise and impact on residential amenity, would have cumulative and indirect impacts on population and human health. Issues outlined in submissions may either directly or indirectly impact

on population and human health or act in combination with other environmental factors. Impacts can also be divided into residential and economic in the way that they affect the local resident and working populations. There is potential for operational noise and construction impacts on the health of local residents, and businesses along the route have expressed concern that the proposed scheme will adversely impact on their operation in both construction and operational phases. This could indirectly impact on the employment, health and wellbeing of the local population.

14.8.2. There are also significant benefits associated with Luas Finglas which is recognised by those who have expressed support for the proposed scheme. The local population will experience superior levels of connectivity to the rest of the city and there is potential to draw people into the area. More "eyes on the street" can also help to reduce anti-social behaviour and improve levels of local health and safety. There may also be opportunities for job creation as Luas Finglas forms an essential part of future Transport Orientated Development.

14.8.3. The proposed development by itself and cumulatively is assessed in terms of population and human health below. In addition, the conclusion is reached above, that the cumulative impact of the proposed development has been assessed in the EIAR and this included population and human health. I also note that Dublin City Council supports Luas Finglas and considers that the assessment of the proposal, as carried out in the EIAR and in terms of statutory and planning context, is satisfactory.

<u>Examination, Analysis and Evaluation</u>

14.8.4. Population and Human Health are considered separately in Chapters 8 and 7 of the EIAR. Associated appendices include the following:

- Appendix A8.1 – Jan Gehl Surveys
- Appendix A6.1 – Construction Environmental Management Plan
- Appendix A6.6 – Environmental Incident Response Plan

14.8.5. The EPA Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (EPA, 2022) note that in an EIAR: *'the assessment of impacts on population & human health should refer to the assessments of those factors*

under which human health effects might occur, as addressed elsewhere in the EIAR e.g. under the environmental factors of air, water, soil etc." The potential impacts of the proposal on population and human health arising from other environmental factors are also addressed under the relevant chapters.

14.8.6. It is recognised in the EIAR that individuals living within 500 metres from the proposed scheme will be potentially most affected by noise, vibration and air emissions. The 500m distance is also used to replicate the average resident's walking speed, time and distance threshold to access services within their vicinity. A radius of 1km around the tram stop locations reflects people's propensity to travel further to a transport hub.

14.8.7. The baseline environment is an urban/ suburban environment with residential, commercial, industrial, as well as community and leisure/ amenity land uses. Along much of the length of the corridor, the proposed scheme passes through green areas. Jan Gehl Surveys on public life were carried out to assess social and physical activity taking place in open spaces and parks. The surveys recording the approximate age and gender of people; those undertaking stationary activity; counts of people moving (when and by what means); and an assessment of the quality of the spaces based on twelve criteria structured around three themes, i.e. Protection, Comfort and Enjoyment.

14.8.8. The EIAR identified noise and vibration and air quality as the two single major influences on human health. All receptors occupied by human beings are considered sensitive. Certain neighbourhoods can be described as sensitive if they contain high levels of social deprivation. Two specific receptor types meriting special attention are healthcare and educational facilities, including medical centres, nursing homes, primary and secondary schools. Population aspects examined primarily relate to local population, local journeys, use of community facilities, and the social and economic well-being of people at a community level.

14.8.9. Other baseline considerations for population are existing transport infrastructure; active travel and public transport; community/ social infrastructure and economic facilities; green areas/ open space; education; health and social services; religious facilities; sports and leisure; other community infrastructure; and economic and retail activity.

14.8.10. In terms of demographics, the EIAR assesses population, age profile, employment and socio-economic status, travel to work and journey times. It is noted that most established residential areas in proximity to the proposed scheme have experienced only modest population growth in recent years as the population age cycle has matured. The population within 1km of proposed stops (CSO, 2022) is 17,892 for Broombridge, 19,550 for St. Helena's, 19,166 for Finglas Village, 17,676 for St. Margaret's, and 14,874 for Charlestown. However, there is significant overlap where a proportion of a population falls within the radius of two stops.

14.8.11. Age profile results show that there is a good degree of variation in the family cycle, with Cabra East A to the south having a higher proportion of younger couples (26%) and Dubber to the north having a higher proportion of families with younger children (43.6%). Finglas South C, Finglas South D, and Finglas North A demonstrate a more mature stage in the family cycle, with over 40% of all household members being adults.

14.8.12. The proportion of the population of working age between 20 and 65 years is quite similar across the study area, but highest in Cabra East A at 71.6% and lowest in Ballygall B at 53.5%. The highest levels of employment in 2022 were in Dubber (which includes much of the airport), at 67.4%, and Cabra East A at 65.1%. Unemployment was highest in Finglas North A at 9.2% and Finglas North A and Finglas North B had the highest proportions of people who were unable to work at 7.8% and 7.7%, respectively. The highest and lowest proportion of retired people are found in Ballygall B (27.8%) and Dubber (3.6%), with the State average being 15.6%. Finglas South C has the lowest levels in the managerial / technical socio-economic groups at 12.8%. The Pobal HP Deprivation Index (Pobal, 2023) also describes Finglas South C as very disadvantaged. Seven other Electoral Divisions are described as disadvantaged.

14.8.13. With respect to travel to work patterns, the highest proportion of trips to work or college were taken by private vehicles (28.2% average), with a large proportion also using public transport (19.0%). The average proportion who walk to work, school or college was 15.9%. The proportion travelling by bicycle at an average of 6.2% is below that for Dublin City as a whole (9.6%). The highest proportion of journeys to work, school or college are completed in between 15 and 30 minutes (30.2% on average) and shorter journeys of up to 15 minutes account for 20.6%. Commuting

trips in Cabra West A and Cabra West B tended to be longer despite the more central location. The average proportion of households without access to a private car was 29.9%.

14.8.14. Table 14.8.1 below summarises the likely significant effects of the proposed development on population & human health as identified in the EIAR.

Potential Population & Human Health Impacts	Potential Effects in the absence of Mitigation	Mitigation and Monitoring Measures	Residual Impact
Construction (Human Health)			
Air Quality	- Air quality standards predicted to be exceeded locally and briefly. - Risk of dust impacts and ecological impacts for demolition, earthworks, construction, and trackout is high, but the impacts on human health are low. - Annoyance from soiling of surfaces. - No significant construction traffic impact on local air quality.	- Implementation of dust mitigation plan. - Implentation of Construction Environmental Management Plan. - Preparation of an Aspergillus Prevention Plan. - No additional mitigation over and above that outlined in other sections.	- Neutral/ not significant and medium-term impact on dust soiling, human health and ecological from demolition, earthworks, construction and trackout.
Noise & Vibration	- Noise and vibration from construction will occur and are likely to cause some degree of annoyance, particularly close to the construction activity.	- Extensive mitigation plan to ensure that the effects of noise and vibration are minimized. - No additional mitigation over and above that outlined in other sections.	- Slight, negative and short terms effects. - Following implementation of mitigation, elevated levels of noise are not expected to pose any risk to human health.
Electromagnetic effects & stray current	- No significant effects.	-	- Negligible
Vermin	- Any construction activity that involves groundworks can result in the mobilization of vermin. Displaced vermin would move rapidly out of sight again.	- Implementation of CEMP	- Adverse effects not predicted.

Psychological effects	- Communities likely to experience annoyance from temporary traffic management and other effects. - Certain individuals may experience a heightened psychological response to noise, but there is no evidence to suggest a broader population-wide psychological impact.	- Implementation of CEMP	- Slight and short-term.
Construction (Population)			
Broombridge Railway Station to St. Helena's Stop	*Journey Characteristics and Connectivity:* - Potential impacts on pedestrian, cycle and vehicle traffic, including accessibility of premises. - Impacts on use of Broombridge Road and Lagan Road given the presence of Broombridge station as a destination on the concentration of places of employment. - Short delays likely but traffic flow will be maintained.	- Signalling required for a temporary two-way traffic arrangement or phased stop/ go shuttle. - Traffic Management Plan to minimise impacts on business access. - Temporary signalisation/flag person restrictions on access to some businesses. - Temporary vehicle parking provided where existing parking is impacted.	- Moderate/ significant short term. - Delay to traffic will not be significant enough to impact on business performance. - No significant detours for pedestrians or cyclists. - Mitigation measures will ensure that impacts will not be significant.
	Journey Amenity and Physical Activity: - Environmental effects due to construction noise or visual intrusion where scheme crosses canal and railway. - Similar effects at Tolka Valley Park Bridge. Works less substantial but sensitive amenity use and contribution of fauna and flora to amenity values.	- Secure hoarding at Tolka Valley Park. - Signage indicating the reason for the works. - Accessibility needs and safety of people with disabilities to be addressed. - Any temporary closure of the canal should occur between Oct. and mid March when canal is closed for boating.	- Brief duration of impact - Slight to moderate significance. - Mitigation measures will ensure that impacts will not be significant.

	General Amenity, Community and Social Infrastructure: - Construction traffic will follow Faussagh Avenue to the R135 or R147 Navan Road Using residential roads. - Construction works for proposed stabling area around 150m from nearest dwellings and over 200m from school. Construction access will be via existing depot. - Impact on Hamilton Apartments from works on the footbridge over railway/ canal. - Noise and vibration impacts on pedestrians/ cyclists and people working in adjacent offices. - Impacts on amenity at southern entrance to Tolka Valley Park. - Impact on the pitch and putt players. - Impacts on residents adjoining 'The Valley'. - Given levels of usage of 'The Valley', Impact on amenity will be low. - Sensitivity of residential area at St. Helena's Road is high in terms of deprivation.	- Implementation of Construction Traffic Management Plan. - Pedestrian access to Tolka Valley Park will be maintained. - Noise mitigation as per Chapter 15 of EIAR. - Secure holding to enclose construction compound and along haul route. - Advanced warning of time and duration of the temporary closure of towpath and greenway.	- Construction traffic volume will be light, presenting a slight moderate impact given sensitivity of the area. - Sensitivity of area is low and effect on population will be slight. - Temporary and significant impact on general amenity Of Tolka Valley Park. - Mitigation measures will ensure that impacts will not be significant.
	Community Severance: - Temporary short term severance of one path in Tolka Valley Park (alternative paths available). - Sense of visual severance from haul route and construction hoarding. - Maximum of eight and six HGV trips will access or egress the southern section of the	- Construction hoarding will be open unless there is a specific need for solid hoarding. - Hard surface diversion proposed for sensitive people to use the park. Park run will be maintained with diversions as necessary.	- Slight residual effect on Tolka Valley Park. - At least a slight impact in terms of construction traffic On access to community facilities.

	works per hour at the AM and PM peak times respectively.	- Signalised crossing facilities at church and Gaelscoil, and traffic calming measures elsewhere.	- Mitigation measures will ensure that impacts will not be significant.
	Economic Activity and Employment: - Noise and vibration impacts on offices within Broombridge Business Centre. - Direct impacts on boundaries of several businesses, e.g. Colorman. - Slight to moderate and short term impacts to less sensitive industrial or warehouse related businesses. - Permanent loss of business car parking, changes to internal vehicle movement and small losses of internal yard space.	- New vehicle access for Colorman.	- Slight negative impact. - Mitigation measures will ensure that impacts will not be significant.
St. Helena's Stop to Finglas Village Stop	*Journey Characteristics and Connectivity:* - Short delays are likely on St Helena's Road due to signalisation but cycle and pedestrian movements maintained. - Short period of signalised counter flow and diversions during localised temporary closures. - Signalisation/ flagman for a short period at entrance to Raven's Court.	- Implementation of Traffic Management Plan.	- Slight temporary negative effects. - Mitigation measures will ensure that impacts will not be significant.
	Journey Amenity and Physical Activity: - Highly sensitive location at St. Helena's Resource Centre and St. Malachy's National School from the perspective of access with a high magnitude of journeys at certain times of day such as early morning, mid and late afternoon, and on Saturdays.	- Measures to ensure that construction works do not impede Garda access to vehicles in times of emergency. - Allow for continuity and safety of the weekly park runs.	- Slight short-term negative journey amenity effects. - Mitigation measures will ensure that impacts will not be significant.

	- Potential for impacts on both journey amenity and physical activity, and a need to minimise any safety risk.		
	General Amenity, Community and Social Infrastructure: - Impacts on St Helena's Resource Centre due to short-term environmental effects, primarily noise, arising from the proximity of the works. - Scale of the works, including tracks, the new Stop and a proposed plaza area, will cover a relatively large area and are likely to have a slight to moderate impact on general amenity in the wider community. - Significant and temporary impact from Farnham pitch realignment. - Environmental impacts such as noise due to the proximity of the works will affect some dwellings, schools and places of worship. - Construction compound on Wellmount Road likely to cause short term environmental impacts on residents. - This area of South Finglas relatively sensitive with a high proportion of families and pockets of older housing with longer term residents. - Direct impact on boundary of Raven's Court - Magnitude low as estate only contains 12 dwellings what location is sensitive. Noise would be significant to very significant at this location prior to mitigation. - Significant impact on Garda station requiring demolition of a building and reconfiguration of car park and access.	- Clear and advanced signage for new access arrangements for St Helena's Resource Centre and St Malachy's National School with managed space for school drop-offs that does not conflict with the access needs for both community facilities. - Support local sports clubs in search for alternative facilities during the realignment of the pitch at Farnham Crescent. Alternatively, works will be undertaken outside of season. - Provide for visible and safe access across works at Wellmount Road / Patrickswell Place, noting morning and afternoon use of the route by school children. - Works at the Garda station will be undertaken as quickly as possible. - Provide temporary alternative, nearby and convenient temporary parking and appropriately timed parking for people with disabilities and parents delivering children. - Give consideration to the car parking needs of employees of the Finglas Resource Centre.	- Mitigation measures will ensure that impacts will not be significant.

	Community Severance: - Impact on single access to Ravens Court. - Physical severance impact on green space between Casement Road and Farnham Crescent and at Welmount Road. - Severance introduced by works along Patrickswell Place.	- Signalisation or a flagman needed for a short period at the entrance to Raven's Court. - Impact moderated by hard surface Resulting in minimum risk and low physical effort for users with buggies or people with disabilities. - Minimise the duration of works wherever possible in neighbourhoods in the vicinity of St Helena's and Raven's Court.	- Mitigation measures will ensure that impacts will not be significant.
	Economic Activity and Employment: - Construction works will require some diversion of traffic but this will not be significant enough to impact on business or retail performance along this section of the route.	- Implementation of Construction Traffic Management Plan.	- Mitigation measures will ensure that impacts will not be significant.
Finglas Village Stop to St. Margaret's Road Stop	*Journey Characteristics and Connectivity:* - Short period of signalised counter flow needed on Mellowes Road. - Works on the new junction arrangements between the R135 North Road/Finglas Road and St Margaret's Road will require significant reconfiguration. - High magnitude of the impact due to the volume of traffic means that some delays are likely at peak time. - Delays could impact on public transport trips and those of workers employed in the many commercial businesses along North Road and St Margaret's Road, as well as non-local traffic.	- Phasing of the works will ensure that new pedestrian crossing facilities are in place in advance of the demolition of the pedestrian bridge. - Pedestrian and cyclist crossings at the new crossing at Finglas Road are to be safe and well-signposted.	- Mitigation measures will ensure that impacts will not be significant.

	Journey Amenity and Physical Activity: - Loss of parking from in front of Finglas Sports and Fitness and the Resource Centre – slight to moderate impact given sensitivity of social facilities. - Construction works on St. Margaret's Road will have a slight to moderate negative impact on journey amenity.	- Safety of crossings of Mellowes Road will need to be maintained until the signalised crossing facility has been installed. - Safe access will be needed to community facilities on St. Margaret's Road.	- Mitigation measures will ensure that impacts will not be significant.
	General Amenity, Community and Social Infrastructure: - Impact of construction noise on community facilities, including outdoor activities. - Demolition noise and visual intrusion of hoardings will affect amenity. - Noise assessed to be slight to moderate in the immediate facility of Mellows Park. - Works will affect paths at two places - short temporary diversions will be provided.	- Southern entrance should remain accessible given that it connects Finglas Village to residential areas west of Casement Road. - Implementation of a Construction Traffic Management Plan to minimise impacts on users of Mellows Park. - Secure hoarding will be provided to enclose construction works at the compound and along the haul route.	- Temporary and direct impacts on amenity use of no more than slight to moderate.
	Community Severance: - Proposed at-grade pedestrian crossing of Finglas Road will be functional, at least as a temporary arrangement, prior to the demolition of the pedestrian overbridge.	- Demolition of the bridge will only proceed once the final proposed pedestrian and cycle lanes and crossings are in place. - Provide temporary crossing facilities at St Margaret's Road in the vicinity of the proposed stop to permit access to bus stop and nearby supermarkets or places of employment.	- Mitigation measures will ensure that impacts will not be significant.
	Economic Activity and Employment: - Impacts on parking at Finglas Sport and Leisure. - Temporary counterflow measures on Mellowes Road are not expected to have a	- Implementation of Construction Traffic Management Plan	- Impacts on parking will be very slight.

	significant impact on retail activity in Finglas Village.		
St. Margaret's Road Stop to Charlestown Stop	*Journey Characteristics and Connectivity:* - Short period of signalised counterflow will be needed during works at McKee Avenue – traffic flow will be maintained. - Disruption to traffic, pedestrians & cyclists along St. Margaret's Road. - Short diversions affecting pedestrians and changes to the entrances to business, residential entrances and McKelvey Celtic AFC.	- As above	- Mitigation measures will ensure that impacts will not be significant.
	Journey Amenity and Physical Activity: - Construction works and traffic management are likely to affect the journey amenity of cyclists, pedestrians and other road users along St. Margaret's Road. - Small diversions for pedestrians and narrowing of footpaths, particularly on the east side. - Impacts on journey amenity will be a significant in themselves, but with the additional effect of noise and visual intrusion from the works.	- As above	- Mitigation measures will ensure that impacts will not be significant.
	General Amenity, Community and Social Infrastructure: - Removal of private driveway parking at St. Margaret's Court. - Significant short term impact on residential amenity from construction noise, vibration and visual intrusion.	- Replacement of parking with parking to the rear of St. Margaret's Court. - Ensure new uninterrupted access arrangements are in place for residents of St Margaret's Court and McKelvey estate. - Agree times of any temporary disruption to access with McKelvey AFC due to works on footpath and cycle lane.	- Mitigation measures will ensure that impacts will not be significant.

	- Temporary disruptions to driveway access reduction of roadside parking. - Permanent closure of the southern entrance to McKelvey Road requiring detour to remaining entrance 120m north. - Visual impact on green space between St. Margaret's Road and Century Business Park.		
	Community Severance: - Works required along the length of St. Margaret's Road.	- Provision of temporary signalised crossing facilities and short detours at regular intervals.	- Mitigation measures will ensure that impacts will not be significant.
	Economic Activity and Employment: - Profound impact on business to be demolished for P&R. - Profound impact on Pizza Hut franchise and North Road Motors, including a car valeting service as businesses will be demolished to make way for St. Margaret's Road Stop. - Impacts on business boundaries and car parking on both sides of St. Margaret's Road. - Construction works for new access road from McKee Avenue will impact directly on lands occupied by KSG which are currently grassed or paved for parking. - Significant impact in the short term on businesses that have to change their access from front to rear.	- Facilitate new vehicle parking or reconfiguration of parking for businesses where spaces have been lost on the east side of St Margaret's Road. - Ensure new uninterrupted access arrangements are in place for businesses. - Provide highly visible signage to direct customers and suppliers to this new access. - Ensure continuity of electricity supply for businesses on the east side of St Margaret's Road or otherwise minimum interruptions flagged in advance. - Agree times of any temporary disruption to access with businesses on west side of St Margaret's Road due to works on footpath and cycle lane.	- Mitigation measures will ensure that impacts will not be significant.

Operational Phase (Human Health)			
Air Quality	- Proposed scheme is electrified and there will be no air pollutants from its operation. - Impacts on local air quality from alterations to traffic patterns (P&R and redistributed traffic on surrounding road network). - Properties along the existing roads will experience a net reduction in road traffic pollution. - In areas predicted to have an increase, predicted air pollutant concentrations at sensitive receptors will remain in compliance with ambient air quality standards.	- Mitigation outlined in other chapters will effectively mitigate any human health risks without the need for any additional mitigation.	- Negligible or slightly positive and long term.
Noise and Vibration	- WHO recommend reducing noise levels produced by rail traffic below 54 decibels (dB) Lden, as LRT traffic noise above this level is associated with adverse health effects (below 44dB Lnight, night-time). - 38 assessment locations, of which only 13 are residential or educational Noise Sensitive Locations, exceed the WHO recommended rail noise threshold of 54dB Lden. Pre-existing baseline levels are such that the rail noise level is not contributing any significant amount to the overall noise environment. - 17 Noise Sensitive Locations were identified with night-time sensitivity which would exceed the WHO night-time recommended rail noise threshold of 44dB Lnight. Once added to the prevailing ambient noise environment, the impact is Slight.	- Mitigation outlined in noise chapter will effectively mitigate any human health risks without the need for any additional mitigation.	- Slight

	- Proposed scheme is expected to reduce the volume of Rd. traffic in the area leading to decreases in road traffic noise.		
Electromagnetic Effects & Stray Current	- Similar projects such as the existing Luas currently operate well inside the guideline limits on human exposure to EMF	- Continued monitoring of the performance of the traction circuit with respect to current returns to the substation will be required.	- No significant human health impact.
Psychological Impacts	- Positive psychological impact expected for those who will use the proposed scheme to meet their transport needs. - Positive effect on psychological health, as well as physical health because of the easier, more frequent access to public amenity areas.	-	- Overwhelming majority will experience positive effects, but at worst, neutral.
Physical Activity	- Modal shift from car to rail transport will have a resultant increase in physical activity. - Connections will be provided to the proposed GDA Cycle Network and new cycle and pedestrian infrastructure will have a profoundly positive impact.	-	- Profoundly positive and long term impacts.
Socio-economics Effects on Health	- Reduction of social isolation. - Better access to community centres, libraries and recreational facilities. - Better access to major employment hubs. - Enhanced public transport can attract businesses and investors to the area. - Opening up of opportunities for higher education.	-	- Positive and long term.
Access to Services	- Improved access to services including healthcare. - Greatest benefit will be individuals living in the vicinity of the proposed scheme itself.	-	- Significant Positive and Long-term benefit

Reduction in Inequalities	- Improved access to employment for those dependent on public transport (car ownership among disabled people and socially disadvantaged is lower). According to Census data, around a quarter of people in Finglas do not have access to a car. - Improvement of active travel infrastructure and reduction of traffic, further increasing safety for pedestrians and cyclists.	-	- Positive, very significant and long-term.
Climate	- Delivery of an efficient, low carbon and climate resilient public transport service, which supports the achievement of Ireland's emission reduction targets. - Luas Finglas will deliver an increase of 1.3 million low carbon public transport trips per annum in 2035. - Reductions in general traffic flows will have a positive impact on the environment.	-	- Significant contribution to reduction in carbon emissions.
Operation (Population)			
General (All Zones)	*Journey Characteristics and Transport Integration:* - Profoundly positive impact on connectivity for people living in Finglas. - People of working age will be provided with more opportunities for work by virtue of areas of employment being more accessible. - Integration with the Iarnród Éireann Dublin-Sligo railway line which connects to Drumcondra and Maynooth. - Integration with local Dublin Bus services and cycle lanes, including the existing Royal Canal Greenway and cycle lanes proposed	- Provide drop-off space or limited timed car parking at Luas Stops where space allows, combined with parking restrictions on roads in nearby residential estates. - Extend integration of the scheme with the bus network by facilitating access from Luas Stops to nearby bus stops with associated signalised crossing facilities or good lines of sight for road crossings. - Ensure that all stops, and nearby access routes to Stops, are open, brightly lit and monitored by CCTV, that emergency assistance buttons are provided at all Stops, and that details on how to promptly	- Enhancement of social inclusion and reduction in social disadvantage. - Net effect is positive, long-term and profound. - Slight impact on amenity and in terms of severance. - Negative impact for residents living in those houses closest to the tracks.

	separately by the NTA GDA Cycle Network Plan (2022). - Journey times will be typically shorter and more predictable than alternative public transport services. - Connections will expand the employment catchment and range of destinations for social activity, providing a positive impact especially for women, disadvantaged and minority groups. - Profoundly positive impact from new cycle infrastructure. - Significant positive impact for footpaths, including new smooth surfacing. - Connections with regional and local roads, although demand for car parking is likely to be an issue in some locations.	contact control centres are included on all trams. - Include pedestrian and cycle sequence in new signalised crossings.	- Transformational change in the local environment.
	Journey Amenity and Physical Activity: - New LRT will also encourage pedestrian and cycle movement once combined or connected with footpaths, pedestrian crossing facilities and cycle lanes. - Step free tram access and smooth surfacing will better-suit people with disabilities and those with buggies. - Provision of passive surveillance, especially where the proposed route crosses open space. Adequate lighting will also be provided.	- As above	- As above
	General Amenity, Community and Social Infrastructure: - Landscaping proposed along the alignment will have a long-term positive effect.	- Severance minimised by use of open and grass track.	- As above

	- Introduction of more activity to green areas currently suffering from anti-social behaviour. - New plaza facilities at stops will have positive impact on amenity. - Sence of severance through parks and open spaces.		
	Community Severance: - Improved connectivity will reduce levels of severance overall. - A sense of new severance is inevitable where the alignment crosses parks and green space or travels between residential properties. - Proposed scheme will also help to provide a sense of physical connection through open spaces.	- Sense of severance minimised by signalised crossing facilities and open track design flush with the ground. Space between tracks will be grassed in green areas. - Important that Luas crossings facility older people, wheelchairs and buggies.	- Physical severance will be slight. - As above
	Economic Activity and Employment: - Benefit economic development by providing for shorter journey times and more journey time reliability to destinations along the route. - Increase catchment for people to work, and socialise, providing a positive long-term effect for local people and for businesses employing staff, or selling products or services. - Increased footfall in vicinity of Luas Stops supporting small businesses. - More active travel will encourage more stops at shops or other businesses along the route.	- As above	- As above

Broombridge Railway Station to St. Helena's Stop	*Journey Characteristics and Transport Integration:* - Significant to profound positive effect for south-north journeys across the study area and to destinations outside. - Businesses in the Broombridge and Dublin Industrial Estates will benefit from new improved accessibility for employees. - Some specific community facilities will benefit from improved accessibility for employees and users. - Improved connectivity to the remainder of the Luas network, Iarnród Éireann services, Dublin Bus services. - Connection to Royal Canal Towpath and greenway and a segregated pedestrian path cycle lane is proposed along Broombridge Road.	- As above	- As above
	Journey Amenity and Physical Activity: - Level of Service improvements for pedestrians and cyclists. - Vegetation along the Royal Canal will be restored and enhanced to screen the industrial boundary to the north. - Grassed track will contribute to less industrial and more landscaped streetscape. - Positive amenity impacts from road junction improvements. - Wider and more open pedestrian access to Tolka Valley Park, with views of river and wetlands.	- As above	- Positive, significant and long term for journey amenity. - As above

	General Amenity, Community and Social Infrastructure: - Operational noise impacts at extended stabling not expected to be significant. - Slight impacts on amenity use of Royal Canal and greenway. - Positive long-term effect for amenity, including for businesses, along Broombridge Road due to the enhanced landscaping. - Landscaping and ground level activity provided by passing LRVs will soften the industrial appearance. - Any negative operational impacts on Tolka Valley Park are judged to be slight. - Only one path in the park crosses the alignment and trams will move relatively slowly. - Green space between Barnamore Grove and the Carrigallen and Gortmore estates will be extensively redesigned as St. Helena's Park. - The combined effect of LRT movements, new pedestrian paths and cycle lanes, new low-level lighting and seating, will be positive for environmental and residential amenity.	- Trams will move relatively slowly and their approach will be forewarned by a bell system. - Tracks will be flush with footpaths so as not to be a barrier to movement. - Design response within Urban Integration Report would support multiple uses to create activity and provide an assurance of security for St. Helena's Park. - Passive surveillance from passing trams. - Provide sufficient drop-off and collection space for parents at St Malachy's School to reduce the risk that access to the St Helena's Resource Centre will be blocked. - Provide disabled parking, timed and permitted parking spaces at St Helena's Stop to provide assurance and safety for vulnerable passengers.	- As above
	Community Severance: - Broombridge Road will be crossable at the railway station, below the overbridge and at the signalised junctions with Lagan Road and Ballyboggan Road. - Canal and towpath will not be severed. - New severance will arise within Tolka Valley Park.	- As above	- Slight impact on Tolka Valley Park. - As above

	- New junction at Tolka Valley Road will improve accessibility of the park from nearby residential estates.		
	Economic Activity and Employment: - Significant positive impact on local businesses, particularly for employee commuting and businesses' capacity to attract workers. - Degree of land take and changes to premises' boundaries will not have a significant impact on business performance along Broombridge Road. However, there will be impacts on access for some businesses.	- As above	- As above
St. Helena's Stop to Finglas Village Stop	*Journey Characteristics and Transport Integration:* - St Helena's Stop will provide access to community facilities. Most of these community facilities are much accessed by private car or public bus using roads which are crossed by vulnerable population subsets. - Particular positive impact for facilities used by people from outside of the immediate area, e.g. Clearwater Shopping Centre and the GAA grounds. - Profound positive impact for the wider community from new pedestrian and cycle connection provided in this section.	- Possible car parking management at community facilities and at Clearwater Shopping Centre.	- Moderate to significant positive effect for public transport and pedestrian accessibility to community facilities.
	Journey Amenity and Physical Activity: - Improvement in Level of Service for pedestrians and cyclists.	- Road signage will be needed to facilitate entry to St. Malachy's National School.	- As above

	- Mix of Accesses, crossings and bus stops will improve safety at Saint Malachy's National School. - Impact on traffic and positive impact on pedestrian and cycle journey amenity. - Positive impact on physical activity for local people.		
	General Amenity, Community and Social Infrastructure: - No direct impact on community facilities aside from green space. - Two reconfigured playing fields at Farnham park, along with proposed shelter, will have positive long term effect. - Erin's Isle GAA Club will have access to a larger catchment. - Change will be a balance of both negative (social or psychological severance) and positive effects (activity and passive surveillance). - Improve access for a minority of students, mainly those attending college or secondary school who arrive from a larger catchment. - Non-significative but negative and long term noise impact on the environment of Ravens Court. - Small area of the public green space in Ravens Court and of two private gardens will be impacted by the land take.	- Mitigation in Ravens Court will be provided in terms of landscaping and new boundary.	- As above
	Community Severance: - Slight level of new severance between Casement Road and Farnham Crescent.	- Pedestrian and cycle crossing will provide relief from severance across St Helena's Road and Farnham Drive.	- As above

	- Significant new severance impact will be introduced where the scheme crosses the entrance to Ravens Court (social and momentary physical severance). - Positive impact from the provision of new access directly linking the Cardiff Castle Road to community facilities on Mellowes Road. - Positive operational impacts on Garda station from new dual vehicular access.	- New signalised crossing for pedestrians and cyclists. - Measures to ensure that the LRT does not significantly impede on Garda access to vehicles in time of emergency.	
	Economic Activity and Employment: - Moderate positive impact for the Clearwater Shopping Centre and its customers.	- As above	- As above
Finglas Village Stop to St. Margaret's Road Stop	*Journey Characteristics and Transport Integration:* - Finglas Village Stop will provide access to a large number of community facilities, as well as to Finglas Village 500m east. - The prospective number of journeys provides for a high magnitude of impact. - Good integration with existing transport modes including Dublin Bus and increased opportunities for active travel. Attractive car free plaza at Finglas Sports Centre. - Loss of some car parking at Finglas Village Stop. - New integrated signalised junction and LRT crossing on Finglas Road will be a more spacious environment in which vehicle traffic speeds would be reduced and which will be easier to mentally map and navigate	- As above	- As above

	compared to existing footbridge to be removed.		
	Journey Amenity and Physical Activity: - Improved Level of Service for pedestrians and cyclists. - Physical activity will be encouraged by connections to the proposed GDA cycle lane along Mellowes Road and by footpath connections to Finglas Village. - Roundabout replacement on Finglas Road will slightly extend vehicle journey times but provide journey amenity gains. - Ground-level crossing will prove a positive journey amenity effect for sensitive population subsets.	- As above	- As above
	General Amenity, Community and Social Infrastructure: - Scheme's location on the eastern boundary of the Mellows Park means that its presence will be a background one.	- As above	- As above
	Community Severance: - Proposed signalised pedestrian crossing will provide a superior alternative to the existing pedestrian island at the roundabout with Finglaswood Road. - Mixture of positive and negative impacts from the proposed demolition of the existing footbridge.	- Provisions will be necessary for the Garda Station and Dublin Fire Brigade to allow emergency fire and Garda services to cross the Luas line to destinations to the west at times when there is queued traffic.	- As above
	Economic Activity and Employment: - Potential to expand the catchment for the community facilities on Mellowes Road and	- As above	- As above

	to attract more people to use Finglas Sports and Leisure. - Easier access to community facilities, including shops and services in Finglas Village.		
St. Margaret's Road Stop to Charlestown Stop	*Journey Characteristics and Connectivity:* - Very significant positive improvement in accessibility in this area of St Margaret's Road. - Improved pedestrian access to residential areas to the south and to commercial and employment destinations. - P&R will minimise impacts on local traffic. - New signalised junctions will have a significant positive effect in making it easier and safer for all journeys. - Proposed scheme integrates as far as possible at this time with the Jamestown Masterplan. - Slight negative permanent effect on accessibility for residents at the end of McKelvey Road. - Impact on property boundaries due to the widening, requiring new accesses for businesses on the east side of St. Margaret's Road.	- As above	- As above
	Journey Amenity and Physical Activity: - Cycle lanes, landscaping and proposed pedestrian and cyclist signalised junctions at the start of St Margarets Road and at McKee Road, and the reconfigured Charlestown junction, will provide for a	- As above	- Significant positive long term impact.

	major improvement in pedestrian and cycle accessibility and journey amenity. - Positive impact houses on at St. Margaret's Road (St. Margaret's Court) with easier and safer vehicle crossings from the northbound carriageway. - Improvement of pedestrian and cyclist Level of Service.		
	General Amenity, Community and Social Infrastructure: - More attractive environment along St. Margaret's Road. - Loss of private driveway parking at St. Margaret's Court and impact on residential amenity due to proximity; however, tracks will provide a degree of separation with road traffic. - Loss of some layby parking on west side of St. Margaret's Road. New dedicated residents' parking will be provided in McKelvey Estate. - Replacement of a narrow length of amenity green space at Charlestown with an open plaza area, represents a slight positive change.	- New landscaping and residents' parking area proposed to the rear of St. Margaret's Court.	- As above
	Community Severance: - Signalised junctions of the start of St Margaret's Road, at McKee Avenue and at Jamestown Industrial Estate will provide significant positive relief from severance when compared with the existing situation.	Ensure new access arrangements are in place for businesses on St Margaret's Road, and for residents of St Margaret's Court, consistent with the Jamestown Masterplan, where existing access will be directed impacted by the proposed Scheme.	- Significant positive long-term effect.

	Economic Activity and Employment: - Several of the businesses on St Margaret's Road will experience improved accessibility for customers and employees from the south. - P&R facility will have a significant positive long-term effect in attracting new prospective customers for local retail businesses. - Negative effect of businesses changing their access arrangements to the rear will moderate over time as customers and suppliers become familiar with new arrangements and if the area is gradually redeveloped in line with the objectives of the Jamestown Masterplan. - Negative impact from longer commercial vehicles having to execute three-point turns or to back out of premises.	- Ensure new access arrangements are in place for businesses on St Margaret's Road, consistent with the Jamestown Masterplan. - Provide highly visible signage to direct customers and suppliers to new access arrangements.	- Significant negative and short term impacts on access arrangements for businesses.
Do Nothing:			
- Residents of Finglas would continue to rely on the private vehicle, bicycle or public bus to access destinations too distant to walk. - Congestion and journey length could increase if current upward trends and local vehicle use continue. - Pedestrian journeys along Broombridge Road would continue to be confined to the east side. - Most crossings on North Road would continue via the existing overhead pedestrian bridge. - Significant severance for pedestrians would persist along St. Margaret's Road. - Amenity of local cycle journeys would remain poor. - Continued high dependence on buses for north-south journeys. - Adverse psychological impacts from progressively longer journey times and uncertainty.			
Monitoring:			
- No additional monitoring over and above that outlined for other sections in the EIAR is proposed for human health (monitoring of dust, noise and vibration, invasive species, and surface water control measures).			

Cumulative Effects:
- Due to the distance away of the 43 other developments reviewed and assessed, they would not result in any likely significant cumulative impacts on human health with the proposed scheme. - 26 ‘other developments’ were screened in for potential likely significant cumulative impacts on Population with the proposed scheme prior to the implementation of any mitigation measures. Cumulative impacts may arise due to additional construction traffic having negative severance and journey amenity impacts, together with an impact on residential amenity. CTMP will be implemented, and consultations will be necessary to prevent any unintended cumulative impacts if construction periods overlap. With standards mitigation measures, the cumulative impact during construction is expected to be not significant. - 14 ‘other developments’ have the potential to yield significant positive cumulative impacts when integrated with the proposed scheme, e.g. BusConnects, Metrolink and the Jamestown Masterplan.

Table 14.8.1 – Consideration of Impacts, Significance and Mitigation Measures for Population and Human Health

The Assessment: Direct and Indirect Effects

14.8.15. I have examined, analysed, and evaluated Chapters 7 and 8 of the EIAR, and all of the associated documentation and submissions on file in respect of effects on population and human health. I am satisfied that the applicant has presented a good understanding of the baseline environment, and that the key impacts in respect of likely effects on population and human health, have been identified.

14.8.16. I am also satisfied that the local population (residents, community and economy); road users (pedestrians, cyclists, public transport users and motorists) and businesses are the main sensitive aspects that may potentially be impacted by the proposed development. The main indirect and cumulative effect will be positive in nature and will relate to the increased active travel and associated health benefits; reduction in traffic emissions; more equitable access to transport; increased employment opportunities; reduction in journey times; improvement in transport reliability; better north-south connectivity; and safer, quieter, more comfortable and visually pleasing street environments for pedestrians and cyclists. There will also be positive effects on property values along the route and the potential for business to attract new customers.

14.8.17. Negative effects on population on human health will be mostly confined to the construction phase. These impacts will be short term and will be mitigated by standard construction practices and implementation of the CEMP. There will also be adverse operational stage effects particularly for those businesses and residents who will have their property compulsorily purchased. Other adverse operational stage effects will include impacts on business operations, i.e. deliveries, access and parking. Operational impacts in terms of noise and vibration will affect those residents living closest to the proposed route, in particular those at Raven's Court and St. Margaret's Court. The proximity of the Luas will also impact on Finglas Garda Station. This will be mitigated through new access arrangements.

14.8.18. Overall, and notwithstanding the various items raised by third parties, it is considered that there will be no significant adverse impacts of population and human health during the construction or operational phases of the proposed development. I am satisfied that the impacts identified would be avoided, managed or mitigated by measures forming part of the proposed development, proposed mitigation measures

and measures within suitable conditions, and that no significant direct, indirect or cumulative adverse effects on population and human health are likely to arise. The longer-term benefits of the proposed development will substantially outweigh any adverse impact which are likely to occur in the short term.

14.8.19. Following the assessment, it can be concluded that the proposed development will have no significant negative impact on people and communities. There will be no significant cumulative effects on population and human health with any existing, permitted or proposed project/ plan.

Conclusion

14.8.20. Having regard to the foregoing, it is considered the main direct and indirect effects on population and human health are as follows:

- Positive long term impacts on **population and human health** through facilitation of improved pedestrian and cyclist safety, faster and more reliable public transport services, reduced traffic congestion, improved air quality and noise reduction, improved road/ street safety, more social interaction and positive accessibility and amenity impacts for community areas.
- Adverse short-term impacts on **population and human health** from the construction phase in terms of access restrictions, noise, vibration, dust, contaminated material, traffic and visual impact. This will be adequately mitigated through compliance with the CEMP and measures outlined in the Land, Soils, Water, Air and Climate and Material Assets sections of the EIAR.
- Adverse long-term impacts on **population and human health** from the temporary and permanent acquisition of land. This will be adequately mitigated through provision of new accesses, replacement boundaries and monetary compensation.

14.9. Biodiversity

Issues Raised

14.9.1. The Development Applications Unit of the Department of Housing, Local Government and Heritage noted in its submission on the application for approval that the proposal could result in significant effects on flora and fauna along and

downstream of the extension's planned route. Of most concern would be any potential adverse effects on otter frequenting the section of the Royal Canal adjacent to Broombridge Station, and on the ex-situ winter season usage by light bellied brent goose of playing fields in the Farnham Drive area of Finglas. There are also concerns that pollutants mobilised into surface water runoff from the proposed Luas extension, particularly during construction could result in adverse effects on flora, fauna and habitats of the Royal Canal and the River Tolka, or associated with European Sites downstream. It is highlighted, however, that measures set out in the EIAR, NIS and CEMP to avoid adverse effects should, if diligently implemented, prevent any such detrimental effects.

14.9.2. Other issues raised in third party submissions that could directly or indirectly affect biodiversity include the removal of greenspace, tree removal, and the opportunity to replace Farnham grass pitches with astro pitches. As noted in TII's response to this submission, an all weather pitch at this location would negatively impact on local fauna of value. The grassland habitat at GAA pitches is of county level ecological importance given its capacity to support the foraging Light-bellied Brent Goose and other species.

Examination, Analysis and Evaluation

14.9.3. Biodiversity is addressed in Chapter 9 of the EIAR. Associated appendices include the following:

- Appendix A9.1 - Aquatic Plant Survey and Report (Royal Canal, Oct. 2022)
- Appendix A9.2 – Breeding Bird Species Survey (June 2021 & June 2024) and Report
- Appendix A9.3 – Breeding Bird Species Data from the Desktop Review
- Appendix A9.4 – Wintering Bird Species Survey (Dec. 2021-Feb. 2022, Dec. 2022-Feb. 2023, Dec. 2023-Feb. 2024) and Report
- Appendix A9.5 – Wintering Bird Species Data from the Desktop Review
- Appendix A9.6 – Otter Derogation Licence Application (Licence granted on 31st October 2024)

14.9.4. The study area was determined from a desk study of protected habitats, flora and fauna. Surveys were conducted for key ecological receptors (KERs) within the study area to assess potential impacts within the zone of influence (ZoI) of the proposed scheme. The ZoI Is based on a judgement of the likely extent of ecological impacts on KERs. The baseline gathers information from existing reports and desk studies, and from a series of ecological site visits.

14.9.5. Consultations were carried out in the preparation of the EIAR with the National Parks and Wildlife Service (NPWS); Inland Fisheries Ireland (IFI); DCC Parks, Biodiversity and Landscape Services Division; Bat Conservation Ireland; BirdWatch Ireland; Irish Brent Goose Research Group; Botanical Society of Britain & Ireland; and other members of the public.

14.9.6. Field surveys were conducted initially on 11/03/21, with an additional habitat survey on 26/03/21. An updated habitat and invasive species survey was carried out on 20/06/2023. Terrestial mammal surveys were conducted on March and May 2021, January and May 2022, and August 2023. Preliminary bat roost and habitat suitability surveys, as well as transect bat activity surveys were undertaken in June 2021, May 2022, May/June/August 2023. Static bat activity surveys were carried out between 26/05/2021 - 28/09/2021; 29/05/2022 - 26/09/2022; and 18/05/2023 – 28/08/2023. Breeding bird surveys were conducted on 26/05/2021, 16/06/2021 and 28/06/2021, and from 22/05/2023 – 28/05/2024. Wintering bird surveys were conducted for 2021/ 2022/ 2023/ 2024. Other surveys were carried out for amphibians, terrestrial invertebrates, freshwater invertebrates and aquatic flora at different dates in 2021, 2022 and 2023.

14.9.7. The KERs identified are European Sites within the ZoI, pNHAs and the Unesco Dublin Bay Biosphere, together with habitats, flora, fauna and Invasive non-native species. Habitats within the study area of higher local valuation and above that are included within the impact assessment process include other artificial lakes and ponds (County); reed and large sedge swamps (Higher Local); tall-herb swamps (National); depositing/lowland rivers (County); canals; amenity grasslands (County); marsh (Higher Local); dry calcareous and neutral grassland (County); and dry meadow and grassy verges (Higher Local). Other habitats of Higher Local valuation in the study area are (Mixed) broadleaf woodland, scattered trees and parkland,

hedgerows, treelines, wet willow-alder-ash woodland, scrub, and ornamental/non-native shrub.

14.9.8. Flora identified as KERs are opposite-leaved pondweed, tassel stonewort, pointed stonewort, rare/ uncommon freshwater microphytes: clustered stonewort, and uncommon/ rare terrestrial flora: Pyramidal orchid and Bee orchid. Fauna identified as KERs are otter, bats, other terrestrial mammals, marine mammals, breeding birds[3], wintering birds[4], reptiles, amphibians, fish, terrestrial invertebrates, protected freshwater invertebrates, and glutinous snail.

14.9.9. The Appropriate Assessment of European Sites is carried out in Section 15.

14.9.10. Table 14.9.1 below summarises the likely significant effects of the proposed development on biodiversity KERs as identified in the EIAR.

[3] Kingfisher - Other Annex, Red and Amber-listed breeding bird species - Green-listed breeding bird species
[4] Light-bellied Brent Goose - Black-headed Gull - Other Red and Amber listed wintering bird species - Green-listed wintering bird species

Potential Biodiversity Impacts	Potential Effects in the absence of Mitigation	Mitigation and Monitoring Measures	Residual Impact
Construction			
European Sites: - North Dublin Bay SAC - South Dublin Bay SAC - Rockabill to Dalkey Island SAC - North Bull Island SPA - South Dublin Bay and River Tolka Estuary SPA - North-West Irish Sea SPA	- Surface water; groundwater-to-surface water; and air-to-surface water pollution. - Air (dust) pollution within supporting ex-situ habitats. - Visual and audible disturbance in supporting ex-situ habitats. - Disruption and spread of invasive non-native species.	- Standard environmental best practice guidance. - Environmental management procedures for site compounds. - Measures within surface water management; pollution control; and dust management plans. - Measures within invasive species management plan. - Area Specific Mitigation Measures (Area 30 – Broombridge Stabling Site, Area 31 – Broombridge to Tolka Valley Park, Area 32 – Tolka Valley Road to Finglas Village Stop). Includes seasonal construction constraints to mitigate risk of disturbance to KER bird species on amenity grasslands and for removal of vegetation.	- Long-term neutral residual impact that is not significant.
Proposed Natural Heritage Areas: - Royal Canal pNHA - North Dublin Bay pNHA - South Dublin Bay pNHA - Booterstown Marsh pNHA	- Surface water; groundwater-to-surface water; and air-to-surface water pollution. - Air (dust) pollution within supporting ex-situ habitats. - Visual and audible disturbance in supporting ex-situ habitats. - Disruption and spread of invasive non-native species.	- As above - Measures specific to all groups of rare and protected floral and faunal species. - Measures specific to wintering bird species.	- Long-term neutral residual impact that is not significant.

- Dolphins, Dublin Docks pNHA	- Physical degradation of associated habitats, and disturbance to and accidental fatalities of associated fauna (Royal Canal).		
UNESCO Dublin Bay Biosphere	- As per European Sites above	- As above	- Long-term neutral residual impact that is not significant.
Habitats			
Stone walls and other stonework	- Potential to be physically degraded or damaged during the construction works on the light rail bridge crossing. - Air (dust) pollution during construction works within Tolka Valley Park has the potential to negatively impact vegetation associated with this habitat.	- Standard environmental best practice guidance. - Environmental management procedures for site compounds. - Measures within surface water management; pollution control; and dust management plans. - Measures within invasive species management plan. - Area Specific Mitigation Measures (Area 31 – Broombridge to Tolka Valley Park)	- Long-term neutral residual impact that is not significant.
Other artificial lakes and ponds	- Introduction of deleterious substances into the habitat resulting in the degradation of the floral communities, lowering the biodiversity value of the habitat. - Air (dust) pollution has the potential to degrade the vegetation associated with this habitat, degrading the biodiversity value. - Installation of falsework for the construction of the light rail bridge has the potential to result in physical degradation of flora species in this habitat. - Accidental spreading of invasive species from where they currently are in Tolka Valley	- As above.	- Long-term neutral residual impact that is not significant.

	Park, to this habitat along Royal Canal may result in displacement of native species.		
Reed and large sedge swamps	- As above (deleterious substances, dust and falsework).	- As above	- Long-term negative residual impact that is not significant.
Tall-herb swamps (Potential Annex I habitat: 'Hydrophilous tall herb fringe communities of plains and of the montane to alpine levels' (6430))	- Degradation of overall water quality and the vegetation associated with this habitat because of hydrocarbon pollution. - Water pollution impacts to this habitat have the potential to indirectly impact bird and mammal species by negatively impacting the local food chain. - Groundwater to surface water pollution may occur due to the Tolka Valley site previously being a landfill. - Air (dust) pollution generated during the construction may harm floating and emergent flora within the pond. Alkaline cement-based dusts have the potential to affect the pond's pH levels, potentially harming pH sensitive aquatic flora and fauna.	- As above. - Area Specific Mitigation Measures (Area 30 – Broombridge Stabling Site, Area 31 – Broombridge to Tolka Valley Park.	Long-term positive residual impact of slight significance.
Depositing / lowland rivers (River Tolka)	- As above (hydrocarbon pollution, local food chain, dust)	- As above	- Long-term neutral residual impact of that is not significant.
Canals (Royal Canal)	- As above (deleterious substances, dust)	- As above	- Long-term neutral residual impact of that is not significant.

Amenity grassland (improved)	- As above (deleterious substances, dust, falsework). - Accidental spread of invasive species.	- As above - Area Specific Mitigation Measures (Area 33)	- Long-term negative residual impact that is not significant.
Marsh	- As above (hydrocarbons, dust). - Potential physical degradation from the excessive footfall of workers and compaction from machinery on-site during construction. This degradation may allow invasives species (e.g. Butterfly Bush) nearby to colonise this habitat.	- As above	- Long-term negative residual impact that is not significant.
Dry calcareous and neutral grassland	- As above (deleterious substances, compaction, dust, and spread of invasive species).	- As above	- Long-term neutral residual impact that is not significant
Dry meadow and grassy verges	- As above (deleterious substances, compaction, dust, and spread of invasive species).	- As above	- Long-term positive residual impact of moderate significance
(Mixed) broadleaved woodland	- As above (deleterious substances, compaction, dust).	- As above	- Long-term positive residual impact of slight significance.
Scattered trees and parkland	- Direct habitat loss due to the footprint of the proposed scheme. - As above (deleterious substances, compaction, dust).	- As above - Tree protection measures.	- Long-term negative residual impact of slight significance.
Hedgerows	- As above (deleterious substances, compaction, dust). - Habitat loss and fragmentation.	- As above	- Long-term positive residual impact of slight significance.

Treelines	- As above (deleterious substances, compaction, dust, habitat loss and fragmentation).	- As above	- Long-term positive residual impact of slight significance.
Wet willow-alder-ash woodland	- Three trees will be lost from this habitat due to the footprint of the proposed scheme. - As above (deleterious substances, compaction, dust).	- As above	- Long-term neutral residual impact that is not significant.
Scrub	- Approximately 82% of this habitat will be lost due to the footprint of the proposed scheme. - As above (deleterious substances, dust, invasive species).	- As above	- Long-term positive residual impact of slight significance.
Ornamental / non-native shrub	- Habitat will be entirely removed in order to facilitate the proposed scheme.	- As above	- Long-term positive residual impact of slight significance.
Flora			
Opposite-leaved Pondweed	- Potential introduction of deleterious substances (e.g. hydrocarbons and solvents) resulting in the degradation of the species population. - Introduction of sedimentation may lead to eutrophication which will be detrimental to the species.	- Standard environmental best practice guidance. - Environmental management procedures for site compounds. - Measures within surface water management; pollution control; and dust management plans. - Measures within invasive species management plan. - Area Specific Mitigation Measures (Areas 30 & 31).	- Long-term neutral residual impact that is not significant.
Tassel Stonewort	- Pollution sensitive species particularly vulnerable to pollution spills (e.g.	- As above	- Long-term neutral residual impact that is not significant.

	hydrocarbons) into the Royal Canal which may degrade the local population. - Species is vulnerable to excessive nutrient-based pollution. Sediment entering the canal via spills or dust settlement into the canal during construction works will prove detrimental.		
Pointed Stonewort	- As above (deleterious substances)	- As above	- Long-term neutral residual impact that is not significant.
Rare / Uncommon Freshwater Macrophytes: Clustered Stonewort	- As above (deleterious substances)	- As above	- Long-term neutral residual impact that is not significant.
Uncommon / Rare Flora: Pyramidal Orchid Bee Orchid	- Both species at risk of potential trampling underfoot or compaction from machinery. - Pyramidal Orchid is present within the red line boundary and present within close proximity to the construction works, making it vulnerable to degradation via pollutant spills. - Both rare orchid species have the potential to be impacted by dust-based pollution, with cement-based dusts being of particular concern given their ability to degrade the species' cellular structures.	- As above - Measures specific to uncommon and rare flora. - Area Specific Mitigation Measures (Areas 30, 31, 32 & 33).	- Long-term neutral residual impact that is not significant.
Fauna			
Otter	Adverse impacts during the Construction Phase may arise in the form of disturbance to foraging, resting (holt) and commuting activities. Potential loss of life to Otter in the case of accidents within the construction site	- Standard environmental best practice guidance. - Environmental management procedures for site compounds.	- Long-term neutral residual impact that is not significant.

	and detrimental impacts to health of Otter from hydrocarbon pollutants.	- Measures within the surface water management; pollution control; and dust management plans. - Measures within invasive species management plan. - Tree protection measures. - Measures specific to Otter (pre-construction surveys of inactive holt, covering of excavations, mammal ramps, exclusionary fencing, replacement commuting shelter including log rafts, toolbox talks, monitoring of site lighting). - Area Specific Mitigation Measures for Areas 30 & 31.	
Bats	- Direct and indirect impacts likely to occur on foraging and commuting bats located within the scheme, resulting from the temporary or permanent land take and/or artificial light/noise/vibration pollution during this phase. - Removal of mature and dark zones may impact commuting.	- As above - Measures specific to bat species (monitoring of newly formed potential bat roost features, directing of lighting away from dark corridors/ high quality foraging areas, carrying out of works in daylight hours wherever possible, toolbox talks).	- Long-term negative residual impact that is not significant.
Other terrestrial mammals: - Badger - Pine marten - Irish hare - Stoat - Hedgehog - Pygmy shrew	- Physiological impact via ingestion / contact with deleterious substances leading to potential fatalities. - Disturbance to foraging and commuting activities. - Potential loss of life in the case of accidents within the construction site. - Surface water and groundwater-to-surface water-based pollution causing a deterioration of prey items in the food chain.	- As above - Measures specific to terrestrial mammals (pre-construction surveys, Covering of excavations, use of mammal ramps, exclusionary fencing, toolbox talks, checking before vegetation clearance)	- Long-term positive residual impact of slight significance.

Marine mammals	- Adverse impacts may arise in the form of accidental introduction of pollutants, such as hydrocarbons, into the local surface water network, which can degrade the insulative qualities of mammals furs living in the River Tolka Estuary. - Surface water and groundwater-to-surface water-based pollution have the potential to impact mammals via the deterioration of prey items in the food chain and have the potential to lead to the bioaccumulation of toxic substances within local marine mammal populations.	- As above - Measures specific to marine mammals (strict adherence to mitigation measures outlined in the CEMP to safeguard downstream marine mammal populations).	- Long-term neutral residual impact that is not significant.
Breeding birds: - Kingfisher. - Other Annex, Red and Amber-listed breeding bird species. - Green-listed breeding bird species.	- Removal of trees will result in loss of 4 or 5 active nests. Impacts to grasslands and woodlands will also have knock-on effect of availability of nesting for bird species in the area. - Environmental pollutants accidentally introduced via surface water, groundwater and/or air pathways into the on-site and adjacent habitats will reduce capacity of these habitats to support foraging activities of breeding birds. - Breeding bird species using the site for foraging purposes may be visually and/or audibly disturbed by works. - Surface water and groundwater-to-surface water-based pollution have the potential to impact breeding birds via the deterioration of prey items in the food chain, leading to bioaccumulation of toxic substances within local breeding bird populations.	- As above - Measures specific to breeding birds (pre-construction surveys, seasonal restrictions on removal of vegetation, breeding bird nest check, toolbox talks on nests, fallen nests and hatchling/ fledglings).	- Long-term positive residual impact of slight significance.

	- Pollution has the potential to indirectly impact breeding birds via the deterioration of food / prey items, and bioaccumulation of toxic elements up the food chain. - Audible and visual disturbance may also disturb breeding bird species, causing them to vacate the site during works.		
Herbivorous Wintering birds: - Light-bellied Brent Goose. - Other Red and Amber listed wintering bird species. - Green-listed wintering bird species.	- Environmental pollutants accidentally introduced via surface water, groundwater and/or air pathways into the on-site and adjacent habitat will reduce the capacity of these habitats to support foraging activities of wintering birds. - Wintering bird species using the site for foraging purposes may be visually and/or audibly disturbed by works. - Surface water and groundwater-to-surface water-based pollution have the potential to impact wintering birds via the deterioration of the food chain, leading to bioaccumulation of toxic substances within local wintering bird populations. - Physiological impact via ingestion or contact with polluted water. - Pollution impacts have the potential to indirectly impact wintering birds via the deterioration of food, and bioaccumulation of toxic elements up the food chain.	- As above. - Measures specific to wintering birds (pre construction wintering bird surveys up to commencement of enabling works/construction phase; monitoring by ECoW; seasonal construction constraints for amenity grasslands; toolbox talks on wintering bird sensitivity to audible and visual disturbance).	- Long-term negative residual impact that is not significant.
Frugivorous Wintering Birds: - Redwing (Red - listed) Green-listed wintering bird species.	- As above for Herbivorous Wintering birds.	- As above	- Long-term positive residual impact of slight significance.

Insectivorous Wintering Birds: - Black-headed Gull. - Green-listed wintering bird species.	- As above for Herbivorous Wintering birds.	- As above	- Long-term negative residual impact that is not significant.
Omnivorous Wintering Birds: - Amber and Red-listed species. - Green-listed wintering bird species.	- As above for Herbivorous Wintering birds.	- As above	- Long-term negative residual impact that is not significant.
Reptiles	- Deleterious pollutants accidentally introduced via surface water pathways into the on-site and adjacent habitats will reduce the capacity of these habitats to support foraging activities of local Common Lizard populations. - Common Lizard using the site for foraging activities may be visually/audibly disturbed by works leading to them vacating sections of the site. - Surface water and groundwater-to-surface water-based pollution have the potential to impact Common Lizard via the deterioration of prey items in the food chain, leading to bioaccumulation of toxic substances within local Common Lizard populations. - Common Lizard may be subjected to disturbance-based impacts, which have the potential to disrupt their foraging and commuting activities, as well as potential	- As above - Measures specific to Common Lizard (pre-construction surveys for common lizard, perform checks of potential basking locations prior to vegetation clearance, toolbox talks about Common Lizard potentially appearing within works area).	- Long-term positive residual impact of slight significance.

	loss of life for individuals within the construction site.		
Amphibians	- Deleterious pollutants accidentally introduced via surface water pathways into the on-site and adjacent habitats will reduce the capacity of these habitats to support foraging activities of amphibians. - Common Frog and Smooth Newt may be subjected to disturbance-based impacts, which have the potential to disrupt their foraging and commuting activities, as well as potential loss of life for individuals within the construction site.	- As above. - Measures specific to amphibians (pre-construction surveys for common frog and smooth newt, toolbox talks, checks prior to vegetation clearance).	- Long-term positive residual impact of slight significance.
Fish: - Atlantic Salmon. - Lamprey species. - European Eel. - Other fish species.	- Adverse impacts may arise from the accidental introduction of pollutants, such as hydrocarbons, into the local surface water network. - Increase in vehicle presence adjacent to local waterbodies will increase nitrogen oxides resulting in acidification of the surface water network, increasing mortality of fish species. - Several fish species within the marine and freshwater environment are known to bioaccumulate pollutants, which can damage their physiological health and introduce toxins into the lowest trophic level of the food web.	- As above. - Measures specific to fish species (strict adherence to the mitigation measures outlined in the CEMP, seasonal restrictions for works along the River Tolka and its riparian zone)	- Long-term neutral residual impact that is not significant (Royal Canal and Tolka Valley Park Pond populations). - Long-term positive residual impact that is not significant (River Tolka populations).
Terrestrial Invertebrates	- Accidental introduction of environmental pollutants via surface water, groundwater and air (dust) pathways, into the terrestrial and semi-aquatic/wetland habitats present	- As above - Measures specific to terrestrial invertebrate (strict adherence to the mitigation measures outlined in the CEMP,	- Long-term positive residual impact of slight significance.

	within and adjacent to the proposed scheme may notably degrade the foraging resources of local terrestrial invertebrates, including the red-listed Large Red-tailed Bumblebee and Moss Carder-bee. - Several invertebrate groups (e.g. Lumbricina – earthworms) are known to bioaccumulate pollutants, damaging their physiological health and introducing toxins to the lowest trophic level of the food web. - Negative impacts have the potential to arise for local terrestrial invertebrates in the form of disturbance to foraging and commuting activities. Removal of vegetation will remove a notable section of foraging grounds as well as create habitat fragmentation for terrestrial invertebrates.	toolbox talks, pre-clearance checks of vegetated areas to be cleared for hives, relocation of hives where practical, checking for any larval stage pollinators located in large groupings upon host-flora and relocation).	
Protected Freshwater Invertebrates: - Glutinous Snail. - Other Freshwater Invertebrates	- Glutinous snail has a very low tolerance to pollution, particularly eutrophication and biodegradable pollution. It is believed that this species' glutinous mantle allows for greater absorption, making it more susceptible to changes in its environment. - Potential introduction of deleterious substances (e.g. hydrocarbons, solvents and cement leachate) have the potential to lead to physiological decline or fatalities for this species.	- As above - Measures specific to Glutinous Snail and other freshwater invertebrate species (strict adherence to the mitigation measures outlined in the CEMP, in order to safeguard the downstream Glutinous Snail population within the Royal Canal and the local freshwater invertebrate species within the Royal Canal, River Tolka and Tolka Valley Park pond.	- Long-term neutral residual impact that is not significant.
Operational Phase			
European Sites: - North Dublin Bay SAC	- None predicted	- Functioning SuDS design to provide surface water run-off attenuation, infiltration, and in-situ retention of	- Long-term neutral residual impact that is not significant.

- South Dublin Bay SAC - Rockabill to Dalkey Island SAC - North Bull Island SPA - South Dublin Bay and River Tolka Estuary SPA - North-West Irish Sea SPA		sediments (and associated nutrients), metals, and hydrocarbons. Vegetation within SuDS will also provide refuge and foraging opportunities for terrestrial invertebrates, with knock-on benefits to bird, amphibian and mammal populations. - Installation of deflectors on overhead lines to minimise collision-based fatalities for KER bird species. - Completion of all remedial and enhancement planting. - Prescribed post-construction monitoring programme for wintering bird species.	
Proposed Natural Heritage Areas: - Royal Canal pNHA - North Dublin Bay pNHA - South Dublin Bay pNHA - Booterstown Marsh pNHA - Dolphins, Dublin Docks pNHA	- None predicted.	- As above - Prescribed post-construction monitoring programme for rare and protected macrophyte species.	- Long-term neutral residual impact that is not significant.
UNESCO Dublin Bay Biosphere	- None predicted.	As above	- Long-term neutral residual impact that is not significant.
Habitats			
Stone walls and other stonework	- None predicted	- Functioning SuDS design.	- Long-term neutral residual impact that is not significant.

Other artificial lakes and ponds	- None predicted.	- As above - Completion of all remedial and enhancement planting.	- Long-term neutral residual impact that is not significant.
Reed and large sedge swamps	- Negative shading impact on vegetation as a result of the new light-rail bridge within Tolka Valley Park.	- As above	- Long-term neutral residual impact that is not significant.
Tall-herb swamps (Potential Annex I habitat: 'Hydrophilous tall herb fringe communities of plains and of the montane to alpine levels' (6430))	- None predicted.	- As above	- Long-term positive residual impact of slight significance.
Depositing / lowland rivers (River Tolka)	- Shading from new light rail bridge will help stabilise water temperatures.	- As above	- Long-term neutral residual impact of that is not significant.
Canals (Royal Canal)	- Shading impact as a result of the new light rail bridge considered a neutral impact given the lack of emergence and floating vegetation flora in this section of the Royal Canal.	- As above	- Long-term neutral residual impact of that is not significant.
Amenity grassland (improved)	- Habitat loss as a result of new light-rail, road and pedestrian infrastructure, as well as conversion to higher quality habitats. - Amenity grasslands associated with wintering bird species will remain intact.	- As above.	- Long-term negative residual impact that is not significant.
Marsh	- Negative shading impact on vegetation as a result of the new light-rail bridge within Tolka Valley Park.	- As above	- Long-term negative residual impact that is not significant.

Dry calcareous and neutral grassland	- Habitat loss during early operational phase.	- As above	- Long-term neutral residual impact that is not significant
Dry meadow and grassy verges	- Habitat loss during early operational phase.	- As above	- Long-term positive residual impact of moderate significance.
(Mixed) broadleaved woodland	- Initially only neutral impacts predicted.	- As above	- Long-term positive residual impact of slight significance.
Scattered trees and parkland	- Habitat loss as a result of new light-rail, road and pedestrian infrastructure, as well as conversion to other habitat types.	- As above	- Long-term negative residual impact of slight significance.
Hedgerows	- Habitat loss during early operational phase.	- As above	- Long-term positive residual impact of slight significance.
Treelines	- Habitat loss during early operational phase.	- As above	- Long-term positive residual impact of slight significance.
Wet willow-alder-ash woodland	- Habitat loss during early operational phase.	- As above	- Long-term neutral residual impact that is not significant.
Scrub	- Habitat loss during early operational phase.	- As above	- Long-term positive residual impact of slight significance.
Ornamental / non-native shrub	- Habitat loss during early operational phase.	- As above	- Long-term positive residual impact of slight significance.

Flora			
Opposite-leaved Pondweed	- None predicted	- Functioning SuDS design. - Prescribed post-construction monitoring programme for macrophytes.	- Long-term neutral residual impact that is not significant.
Tassel Stonewort	- None predicted	- As above	- Long-term neutral residual impact that is not significant.
Pointed Stonewort	- None predicted	- As above	- Long-term neutral residual impact that is not significant.
Rare / Uncommon Freshwater Macrophytes: Clustered Stonewort	- None predicted	- As above	- Long-term neutral residual impact that is not significant.
Uncommon / Rare Flora: Pyramidal Orchid Bee Orchid	- None predicted	- As above	- Long-term neutral residual impact that is not significant.
Fauna			
Otter	- None predicted	- Completion of all remedial and enhancement planting. - Functioning of all the elements operational SuDS design. - Prescribed post-construction monitoring programme for Otter.	- Long-term neutral residual impact that is not significant.
Bats	- Bottle-necking of existing dark corridors present within the boundaries of the proposed scheme.	- As above - Design specifications within the lighting plan ensuring minimal light pollution impacts for nocturnal species. - Prescribed post-construction monitoring programme for bat species.	- Long-term negative residual impact that is not significant.

Other terrestrial mammals: - Badger - Pine marten - Irish hare - Stoat - Hedgehog - Pygmy shrew	- Low collision mortality risk.	- As above - Design specifications within the lighting plan ensuring minimal light pollution impacts for nocturnal species.	- Long-term positive residual impact of slight significance.
Marine mammals	- None predicted	- As above	- Long-term neutral residual impact that is not significant.
Breeding birds: - Kingfisher. - Other Annex, Red and Amber-listed breeding bird species. - Green-listed breeding bird species.	- Low collision (LRV and overhead cables) mortality risk. - Loss of habitats providing foraging and nesting during early operational phase.	- As above - Installation of deflectors on overhead lines to minimise collision-based fatalities for KER bird species.	- Long-term positive residual impact of slight significance.
Herbivorous Wintering birds: - Light-bellied Brent Goose. - Other Red and Amber listed wintering bird species. - Green-listed wintering bird species.	- Low collision (LRV and overhead cables) mortality risk. - Minimal noise disturbance impact (LRV) - Minor visual disturbance (humans and dogs) at Farnham green area.	- As above - Prescribed post-construction monitoring programme for wintering bird species.	- Long-term negative residual impact that is not significant.
Frugivorous Wintering Birds:	- As above for Herbivorous Wintering birds.	- As above	- Long-term negative residual impact that is not significant.

- Redwing (Red - listed) Green-listed wintering bird species.			
Insectivorous Wintering Birds: - Black-headed Gull. - Green-listed wintering bird species.	- As above for Herbivorous Wintering birds.	- As above	- Long-term negative residual impact that is not significant.
Omnivorous Wintering Birds: - Amber and Red-listed species. - Green-listed wintering bird species.	- As above for Herbivorous Wintering birds.	- As above	- Long-term negative residual impact that is not significant.
Reptiles	- Low collision (LRV) mortality risk.	- As above	- Long-term positive residual impact of slight significance.
Amphibians	Low collision (LRV) mortality risk.	- As above - Design specifications within the lighting plan ensuring minimal light pollution impacts for nocturnal species. - Measures outlining the creation of beneficial deadwood piles within woodland habitat.	- Long-term positive residual impact of slight significance.
Fish: - Atlantic Salmon. - Lamprey species. - European Eel. - Other fish species.	- Minor increase in shading for the River Tolka and Royal Canal.	- As above	- Long-term neutral residual impact that is not significant (Royal Canal and Tolka Valley Park Pond populations).

			- Long-term positive residual impact that is not significant (River Tolka populations).
Terrestrial Invertebrates	- None predicted	- As above	- Long-term positive residual impact of slight significance.
Protected Freshwater Invertebrates: - Glutinous Snail. - Other Freshwater Invertebrates	- None predicted	- As above	- Long-term neutral residual impact that is not significant.

Do Nothing:

- Ecological value of the site would remain largely unchanged given that the majority of the site area is currently managed by Local Authorities.
- Only changes to the habitats within the boundaries of the on the Waterways Ireland section along the Royal Canal would be those resulting from grassland (biodiversity) management change, i.e. allowing more dry meadow habitats to grow in areas currently occupied by amenity grassland.
- Dry meadow sections will develop into scrub, while the existing scrub section will grow into immature woodland where tree species are present.
- These minor changes to the habitats within the proposed scheme's boundaries would result in slight positive impacts for specific faunal groups, including terrestrial mammals, breeding birds, and terrestrial invertebrates.

Monitoring:

- Monitoring programs for dust, water, noise and vibration will be implemented during the construction phase.
- CEMP may need to be altered during the lifecycle of the construction period to take account of monitoring results.
- Water quality monitoring to ensure compliance with environmental quality standards.
- Silt fences will be repaired and/or replaced as necessary by contractor as part of the on-going environmental monitoring programme.
- Contractor shall carry out visual inspection of surface water control measures (settlement tanks, silt fences, fuel storage areas etc.) on a daily basis for any damage and correct functioning.
- Contractor will be required to update the Final Invasive Species Management Plan (ISMP) with a detailed Monitoring Plan and Programme which will require approval by NPWS.

- Regular (seasonal) pre-construction surveys will be required for monitoring of the currently inactive Otter holt located along the south bank of the Royal Canal at Broombridge. - Regular (seasonal) pre-construction surveys will be required for monitoring of newly formed potential bat roost features within structures and trees present within the works area. - 24-month post-construction monitoring period will be conducted by a suitably qualified wintering bird ecology team on the migrant wintering bird species, in particular the Light-bellied Brent Goose. - Prescribed post-construction monitoring programme for rare and protected macrophyte species.
Cumulative Effects:
- Due to the distance, scale and nature of the 43 other developments reviewed and assessed, they would not result in any likely significant cumulative impacts on biodiversity with the proposed scheme during construction or operational phases. Biodiversity ZoIs do not overlap, and spatial separation ensures that any potential disturbances to local ecosystems are isolated and do not combine to create any cumulative effects.

Table 9.8.1 – Consideration of Impacts, Significance and Mitigation Measures for Biodiversity

The Assessment: Direct and Indirect Impacts

14.9.11. I have examined, analysed, and evaluated Chapter 9 of the EIAR, all of the associated documentation (notably breeding and wintering bird survey data 2015-2024, the Otter Derogation Licence Application, and Aquatic Plant Survey and Report), as well as submissions on file in respect of effects on biodiversity. I am satisfied that the applicant has demonstrated a good understanding of the baseline environment and the likely environmental effects of the development.

14.9.12. The proposed Luas Finglas extension to the Green Line will be situated along a 3.9km corridor from Broombridge depot to Charlestown. The route passes along Broombridge Road and through Tolka Valley Park with bridges proposed over the Royal Canal and Tolka River. The route then continues from Tolka Valley Road through a green strip at St. Helena's and around Farnham pitches before it utilises more green corridors on the approach to Finglas Village Stop. After Finglas Village Stop, the route skirts along Mellows Park. The final section to Charlestown is along St. Margaret's Road. Most of the route will be built using grass track.

14.9.13. The proposed scheme corridor comprises a wide range of habitats, including artificial urban landscapes, amenity grasslands, dry meadows, scattered tree and parkland, mixed broadleaved and riparian woodlands, reed and tall-herb swamps, marshes, hedgerows, treelines and scrub; as well as the Royal Canal and River Tolka. Key Ecological Receptors (KERs) were surveyed to identify and assess the potential impacts of the proposed scheme on biodiversity. KERs for the proposed scheme include designated sites, habitats, flora and fauna.

14.9.14. The proposed development was assessed in the EIAR for the following direct and indirect impacts in the absence of mitigation:

- Direct habitat loss and fragmentation;
- Physical degradation of habitats;
- Disturbance and displacement of protected faunal species (visual and audible);
- Pollution of surface and groundwater networks; air (dust) pollution; and
- The spread of invasive non-native species.

14.9.15. Having regard to the application of standard best practice mitigation measures, as set out in the EIAR, the site-specific and species-specific measures referred to above, together with the scale and duration of the proposed works and the largely neutral to slight impacts on terrestrial habitat, birds, mammals, and aquatic habitats and species, I am satisfied that significant effects on biodiversity will not arise. With the application of standard environmental best practice guidance; environmental management procedures for site compounds; measures within the surface water management, pollution control, and dust management plans; and detailed measures within invasive species management plan, as well as measures specific to protect all groups of rare and protected species, the residual construction phase impacts will be not significant.

14.9.16. Other specific measures are included during the construction phase for otter, bat and other terrestrial mammal protection and monitoring, as well as measures for marine mammals, reptiles, amphibians and invertebrates. Measures specific to breeding and wintering birds include pre-construction surveys, seasonal restrictions on removal of vegetation, breeding bird nest check, seasonal construction constraints for amenity grasslands, and toolbox talks on nests, fallen nests and hatchling/ fledglings, and on wintering bird sensitivity to audible and visual disturbance. Measures specific to fish species include strict adherence to the mitigation measures outlined in the CEMP, and seasonal restrictions for works along the River Tolka and its riparian zone.

14.9.17. During the operational phase of the proposed scheme, the main impacts are disturbance and potential displacement and injury of protected faunal species, e.g. bird species such as Light-Bellied Brent Goose and Mute Swan, as well as mammals such as Otter and local Bat species. The CEMP includes dynamic plans and mitigation measures, updated as necessary by the appointed contractor, and this will also form the basis of operational phase ecological safeguards. The Luas Finglas - Urban Integration Report will help to ensure that the temporarily / short-term impacted habitats will return to their original or enhanced condition.

14.9.18. In terms of cumulative impacts, other developments reviewed and assessed would not result in any likely significant cumulative impacts on biodiversity with the proposed scheme during construction or operational phases having regard to the distance, scale and nature of these projects.

Conclusion

14.9.19. Having regard to the foregoing, it is considered there are no significant impacts on biodiversity. Notwithstanding this, any potential for cumulative impact will be mitigated as follows:

- Neutral to slight impacts on **Biodiversity** in terms of direct habitat loss and fragmentation; physical degradation of habitats; disturbance and displacement of protected faunal species (visual and audible); pollution of surface and groundwater networks; air (dust) pollution; and spread of invasive non-native species. Mitigation will nonetheless be implemented to protect water quality through works scheduling, invasive species management, measures to mitigate against the release of suspended solids, fuels and oils, and cements, and measures to minimise disturbance to protected species.

14.10. Land, Soil, Water, Air and Climate

Issues Raised

14.10.1. A number of issues were raised in submissions pertaining to these environmental factors. The most significant is noise, both at construction stage but more so the noise associated with the operation of the light rail system. Noise was a concern of both prescribed bodies and in third party submissions. Third party concerns regarding noise came mainly from residents living in closest proximity to the proposed tram line. Other organisations who object about the potential impacts include nearby counselling and youth support groups, as well as a public representative. Concerns were raised about the noise and vibration of passing trams and the sounding of tram bells.

14.10.2. Dublin City Council noted the proposed development may help to reduce road traffic volumes in the area and associated noise. However, it is considered questionable that noise monitoring for a period of 24 hours or less is sufficient to establish a baseline, and that monitoring for a period of at least two weeks would provide a more reliable baseline. It is also considered that the baseline for nighttime noise has been established against a very limited period of noise measurement and that the assessment should be based on calculated rail noise against the threshold rather than cumulative noise levels against the baseline. The Council requests that TII

consults with sensitive noise receptors along the route and that further consideration should be given to final mitigation measures at certain locations.

14.10.3. Dublin City Council also made submissions pertaining to the impact of the proposed scheme on surface water infrastructure and on the existing Integrated Constructed Wetland (ICW) in Tolka Valley Park. Clarity is requested on mitigation for impacts on the ICW. Uisce Éireann also refers to 60 potential major water infrastructure diversions and seven potential wastewater infrastructure diversions that would occur as a result of the proposed scheme. It is requested that the applicant shall agree outline designs in advance of a Confirmation of Diversion Feasibility letter issuing from Uisce Éireann.

14.10.4. A significant impact with respect to land will be the permanent acquisition of residential and commercial property for the operation of the proposed scheme and temporary acquisition of land during construction. The proposal will therefore impact on the affected landowners. In addition, the proposed scheme will impact on existing access arrangements along the light rail corridor.

<u>Examination, Analysis and Evaluation</u>

14.10.5. There are a number of chapters throughout the EIAR that pertain to Land, Soil, Water, Air and Climate. Water is addressed in Chapter 10 and Land and Soils (Soils, Geology, and Hydrogeology) in Chapter 11. Land Take is covered in Chapter 12. Air Quality, Climate, Noise and Vibration and Electromagnetic Compatibility and Interference are assessed in Chapters 13, 14, 15 and 16 respectively.

14.10.6. Associated appendices to these chapters include the following:

- Appendix A10.1 - Water Framework Directive Compliance Assessment
- Appendix A10.2- Flood Risk Assessment
- Appendix A10.3 - Surface Water Quality Results
- Appendix A10.4 - Integrated Constructed Wetland Mitigation and Works Proposal
- Appendix A10.5 - Drainage Design Basis Statement
- Appendix A11.1 - GII Factual Ground Investigation Report
- Appendix A11.2 - Generic Qualitative Risk Assessment Report

- Appendix A14.1 - Carbon Tool Memorandum
- Appendix A15.1 - Baseline Noise & Vibration Monitoring Report
- Appendix A15.2 - Construction Plan Source Data
- Appendix A16.1 - Electromagnetic Compatibility Survey Plan
- Appendix A16.2 - Electromagnetic Compatibility Desktop Survey
- Appendix A16.4 - Soil Resistivity Survey

14.10.7. In terms of Land, the proposed scheme is located within an urban setting in a mix of industrial and commercial lands, green urban areas and discontinuous urban fabric. The alignment is alongside existing public road corridors at Broombridge Road at the southern end and St. Margaret's Road at the northern end. In between, the route continue through Tolka Valley Park, St. Helena's Park, alongside Farnham Pitches, and along green strips as far as Finglas Garda Station. The route will be located along Mellowes Road and along the edge of Mellows Park before crossing Finglas Road at a new at-grade junction to replace the existing roundabout.

14.10.8. The topography of the area steadily increases as the alignment moves northwards. The River Tolka is the lowest elevation at 19m OD. Limestone-derived till overlies the bedrock geology across much of scheme area, which is mostly underlain by a 'Locally Important Bedrock Aquifer' that is moderately productive in local zones (LI). There is a potential groundwater-to-surface water pathway within the locality of the proposed scheme, as the underlying aquifer is likely to rapidly discharge to the nearby watercourses.

14.10.9. Ground investigation works along the route were carried out between September 2021 and January 2022. There is generally a low sub-soil permeability throughout the boundary of the proposed Scheme (GSI, 2023). An historic waste zone is expected at Tolka Valley Park either side of the proposed alignment.

14.10.10. A total of 66 property owners and over 340 stakeholders (leaseholders and tenants) will be directly affected by the proposed scheme. Individual plots include 19 residential properties, 14 industrial and commercial properties, 16 community properties, and four vacant potential development sites. Some of the temporary land take will be used for construction compounds, crane operation areas and material storage.

14.10.11. The proposed scheme is entirely within the Tolka_SC_020 Water Framework Directive Sub-catchment and it underlain by the Dublin Groundwater Body. The proposed scheme crosses the Tolka River at Tolka Valley Park and Finglaswood Stream at this location. Batchelor's Stream is in proximity to the proposed scheme near the proposed St. Margaret's Stop. Other key surface water features in the study area include the Royal Canal and the Integrated Constructed Wetland in Tolka Valley Park. Surface water and groundwater sampling was conducted between January 2022 and January 2024 and a site-specific Flood Risk Assessment was undertaken to assess the potential impact of the proposed Tolka Valley Park bridge on flood extents. An assessment of proposed scheme's compliance with the WFD requirements was also undertaken.

14.10.12. Air quality monitoring was conducted at sensitive locations along the proposed scheme and it was determined that national and European air quality standards are met along the proposed scheme corridor. The assessment for noise and vibration included a review of baseline noise data, and completion of baseline noise and vibration monitoring. The main current source of noise within the study area is road traffic, with elevated noise levels being particularly noticeable on St Margaret's Road and the junction of Broombridge Road / Ballyboggan Road. Road traffic and occasional train movements recorded negligible levels of vibration.

14.10.13. The proposed scheme will generate Direct Current (DC) fields (from train power); Alternating Current (AC) fields (generated by the electricity drawn from the Electricity Grid); and Radiofrequency (RF) fields (generated by radio systems). The most sensitive receptors to Electromagnetic Interference (EMI) would be research facilities (universities and third level institutes), scientific institutions, medical centres, and hospitals.

14.10.14. The climate assessment was undertaken using TII's carbon calculator tool, which assesses lifecycle carbon emissions for national road and light rail infrastructure projects in Ireland. Changes in road traffic volumes in the operational phase and associated GHG emissions are also considered. Furthermore, the proposed scheme is assessed in terms of its vulnerability to climate change.

14.10.15. Table 14.10.1 below summarises the likely significant effects of the proposed development on Land, Soil, Water, Air and Climate as identified in the EIAR.

Potential Land, Soil, Water, Air and Climate Impacts	Potential Effects in the absence of Mitigation	Mitigation and Monitoring Measures	Residual Impact
Construction			
Land & Soils (Soils, Geology & Hydrogeology)	*Surplus soil arising from earthworks:* - Proposed scheme to be constructed predominantly at grade, requiring limited overburden removal. - Subsoils to be excavated are generally urban soil comprising made ground of low commercial value. - Bare earth exposed during excavation works may be subject to erosion. - Excavated soil and rock material identified for re-use/disposal shall be stockpiled on site and will require temporary treatment and storage. - Surplus material characterised as being of low commercial value, generally comprising construction and demolition waste, low fertility topsoil and made ground. *Potentially contaminated soils arising from earthworks during construction:* - Direct contact, ingestion, inhalation of dust from historic municipal landfill and made ground. - Chemical attack from aggressive ground works. - Of the 51 waste samples assigned a waste category, 39 are designated Category A (unlined recovery sites), 10 are designated	- Historic Waste encountered during construction, including that already identified at Tolka Valley Park, will be removed to a suitably licensed facility. - Excavation in areas of historic waste will be carried out as per requirements specified in the CEMP. - Existing concrete structures scheduled for demolition as part of the project scope, will be crushed and processed for re-use as structural fill. - Adverse impacts via the groundwater pathway are not anticipated given the distance to European sites within the ZoI as identified in the AA screening report. - Vertical alignment predominantly at grade so most excavations will be both spatially and temporally limited. - CEMP (including Construction and Demolition Resource and Waste Management Plan) will detail procedures to manage the excavation and removal of soil. - Where unidentified contamination is encountered, material shall be segregated and stockpiled on a low permeability surface with bunding and shall be covered to allow further testing.	- Neutral and negligible.

	Category B1 (inert landfills), and 2 are designated Category C (non-hazardous landfills). - Potential asbestos containing material considered to be sufficiently deep that there is negligible risk to site users. - Highest likelihood of encountering potential sources of contamination is within Tolka Valley Park as the site of a former landfill. *Importation of fill:* - Approximately 12,000m^3 of structural fill required for importation. - Increased truck movements potentially risk of damage to soils *Loss of soil cover, soil erosion and compaction:* - Stored and stockpiled materials will be subject to erosion if left exposed over a long period of time. - Vehicle and plant movements have the potential to erode soil cover and/or compact the underlying subsoil. *Contamination of existing soils, geology and groundwater by construction activities:* - Exposure of historic waste deposits during earthworks may result in mobilising potential contaminated material through leaching or surface run-off. - Localised accidental spillages of fuel or chemicals have the potential to contaminate the underlying soils. May result in the requirement to excavate/remediate a small	- Contractor will be responsible for the appropriate segregation of excavated materials, and appointment of environmental engineer/ scientist to identify any previously unidentified contamination. - Consideration of transfer of non-reusable material as a by-product. Material not suitable for reuse will be removed off site for treatment, recycling or disposal at an authorised waste management facility. - Contractor responsible for the compliant management of all waste generated by construction activities and for updating and implementing the CEMP. - Contractor responsible for regular testing of excavated soils to monitor suitability of soil for re-use. - Construction workers will be briefed on the possible presence of localised asbestos. - Imported materials will be sourced from reputable quarries as listed on the registers maintained by local authorities. - Topsoil stripping and earthworks removal will not be carried out over large areas in advance. - Appropriate piling method will be selected to reduce risk of cross-contamination from made ground into the underlying groundwater. - In the unlikely event the identified well is intercepted by the proposed scheme, it will be tested to confirm existing yield rates in advance of being decommissioned.	

	proportion of contamination or result in a minimal risk of pollution to soils. - River Tolka, Royal Canal, Finglaswood Stream, and Bachelors Stream vulnerable to potential groundwater contamination from the above unplanned activities. *Disruption to an existing well:* - Considering the urban setting and readily available main water supply, this well is likely no longer in use. - Probability of encountering unknown groundwater supply wells in an urban setting is low.	Replacement supply will be put in place as necessary.	
Land Take	*Acquisition of properties on a temporary and permanent basis and demolition of structures, including boundary walls / fencing:* - 170,625.5m^2 is to be acquired temporarily to accommodate construction compounds and construction activities and 53,490.5m^2 is to be acquired permanently. - Demolition works including 2 industrial premises 13 access gates on boundary walls on Broombridge Road; parks storage facility within Tolka Valley Park; freestanding building at rear of Garda Station; substations at Raven's Court and Garda Station combined into one; boundary walls/ metal fencing at Raven's Court/ Garda Station; DCC Parks storage at side of Finglas Civic Centre and fencing and walls	*Mitigation by design:* - Process of assessment and refinement of the route and stop layouts has determined the proposed requirements for permanent land take. - Temporary land take required for construction activities has been minimised wherever possible and boundaries adjusted to avoid and / or minimise impacts as far as possible. *Compensation for Compulsory Purchase:* - Owners, leaseholders and occupiers of acquired lands will be entitled to submit a claim for compensation which, in default of agreement, will be determined by a Property Arbitrator. However, compensation is not a factor in the assessment of land take impacts nor the mitigation thereof. *Specific Mitigation Measures:*	- All residual impacts imperceptible to moderate apart from the following: *Profound:* - Permanent reduction in land at industrial site, realignment of road, utilities relocation, demolition of industrial building and boundary fence (D1-31A-A17). - Demolition of existing Parks Department building (D1-33O-A8). - Realignment of road, demolition of existing building, private right

	in this area; pedestrian overbridge at N2; North Road Motor Company and Pizza Hut Delivery for new shop; domestic boundary walls on St Margaret's Road, North Road and a garden shed at 234 McKee Avenue; electrical substations Manhattan Peanuts and Lidl; small storage building within Jamestown Little Industrial Estate; small lean-to extension of the Finglas Auto Parts; loading dock within Jamestown Business Park; and Discount DIY. - Temporary land take will be used for construction compounds, crane operation areas and material storage. - Access to a number of properties will be affected, involving some limited restrictions/diversions from time to time as agreed with the owner / occupier. - Minor demolition requirements associated with utility structures and boundary walls and fencing along the alignment. - Reduction in developable land area. - Reduced circulation space and loss of parking spaces and loading bays. - Extinguishment of right of way. - Reduction in garden area	- Provision of new boundary treatments. - Use of grass track, minimised construction areas, reinstatement of landscape areas and additional new drainage, planting, lighting, cycleways, accessible footpaths, general improvement in public amenity, replanting and improved landscaping. - Regrading, reinstatement and landscaping. - Rearrangement of circulation/ parking/ access within site. - Enhancement of public realm. - Garden reinstatement. - New signage for guidance/wayfinding. - Coordination with landowner to seek to limit impacts on potential redevelopment. - Temporary local traffic management and access controls will be put in place as required and all impacted owners / occupiers will be notified and consulted to minimise any temporary impact	of way to be acquired at proposed St. Margaret's Stop (D1-33B-A19, D1-33B-A20, D1-33B-A24, D1-33B-A25). - Realignment of road, demolition of existing building at St. Margaret's Road Stop (D1-33B-A27). - Permanent acquisition of land, demolition of existing building, private ROW at Discount DIY. (D1-33B-A33, 34, 36, 39, 40, 41, 43 & 44). *Very Significant:* - Permanent and temporary reduction in land, realignment of road, utilities relocation, demolition of extension to commercial building at St. Margaret's Road Stop (D1-33B-A18, D1-33B-T10). *Significant:* - Demolition of community building

			(D1-31B-A4, D1-31B-A6) - Permanent and temporary reduction in land, acquire private ROW, access, utilities, retaining wall, boundary fence, and reconfiguration of car park. Demolition of building at Garda Station, relocate memorial garden, exercise area and TII equipment (D1-32D-A18, D1-32D-A19, D1-32D-T18, D1-32D-T19, D1-323-T2, D1-32D-A21, D1-32D-A22). - Permanent and temporary reduction in residential land areas at St. Margaret's Stop (D1-33B-A29, D1-33B-T11) - Permanent and temporary reduction in land area, access road, utilities relocation at St Margaret's Road Stop (D1-33B-A30) - Permanent and temporary reduction in land area, realignment, utilities relocation.

			- Permanent and temporary reduction in land area, track construction, realignment of road, utilities relocation. Removal of access onto St Margaret's Road for vehicles. Private ROW to be acquired (D1-33C-A4-A11, A13, T2-T5, T6 & T7). - Permanent and temporary reduction in land area, realignment, utilities relocation, relocation of substation, access modifications, demolition, and private ROW to be acquired (D1-33B-A21-23, D1-33B-A23, D1-33B-A26, D1-33B-A32, D1-33B-A35, D1-33B-T12, D1-33B-T15. - Permanent and temporary reduction in land area, realignment, utilities, relocation of wall and removal of parking access from St Margaret's Road, private ROW at St.

			Margaret's Court (D1-33C-A17, D1-33C-T10, D1-33C-A19, D1-33C-T12, D1-33C-A21, D1-33C-T14, D1-33C-A22, D1-33C-T15).
Air Quality	*Construction Phase Traffic Emissions:* - There will be fewer than 200 AADT heavy duty vehicles (HDV) on the existing road network during construction and therefore no significant air quality impacts from construction vehicle emissions. *Construction Phase Dust Emissions:* - Type of construction activities that could cause fugitive dust emissions are demolition; earthworks; handling and disposal of spoil; wind-blown particulate material from stockpiles; handling of loose construction materials; and movement of vehicles, both on and off-site. - Main effect is annoyance due to soiling of surfaces, particularly windows, cars and laundry. - There are human receptors within 350m and an ecological receptor within 50m of site boundary. - Total building volume to be demolished is >50,000m^3 and therefore dust emission magnitude for demolition is defined as large. - Total site area where earthworks will occur is >100,000 m^2. The site contains moderately dusty soi and there will be >10	- Construction dust control measures and good construction site management and practice. - Implementation of Stakeholder Communications Plan. - Dust Management Plan with CEMP updated prior to commencement of construction. - Site management and recording of dust and air quality complaints, recording of incidents and liaison with other high risk construction site. - Monitor dust by undertaking daily on-site and off-site inspections where receptors are nearby. - Prepare and maintain the site so that machinery and dust causing activities are located away from receptors. Erect screens around dusty activities; fully enclose site for specific operations; avoid site runoff; keep site fencing, barriers and scaffolding clean; remove dust producing materials or cover if being reused; and cover, seed or fence stockpiles. - Measures for operating vehicles/ machinery and sustainable travel, including speed limits and construction logistics plan.	- Potential for fugitive dust emissions at nearest sensitive receptors will be controlled to ensure potential impacts are of negligible significance. - No significant construction traffic impact on local air quality.

	heavy moving earth moving vehicles active at any one time. The total material moved is >100,000 tonnes. Dust emission magnitude for earthworks is defined as large. - The total building volume will be >100,000m3. There will be potentially dusty construction material and on-site concrete batching. - There will be >50 outward HDV trips on average / day and the unpaved road length will be >100m. Construction works will progress in multiple locations at one time with several activities occurring concurrently. - Sensitivity of people to dust soiling his high. - Sensitivity of the area to human health impacts from demolition, earthworks, construction and track-out dust impacts is low. - High sensitivity to ecological impacts in terms of earthworks, construction and trackout because the proposed scheme traverses the Royal Canal pNHA. - High risk of dusk soiling and ecological impacts from demolition, earthworks, construction, and trackout.	- Measures during construction operations including dust suppression, enclosed chutes, minimising drop heights, Cleaning up of spillages. - Waste management measures. - Measures specific to demolition. - Measures specific to earthworks. - Measures specific to construction. - Measures specific to track out. - Aspergillus Prevention Plan taking into account the National Guidelines for the Prevention of Nosocomial Aspergillosis. - Removal of asbestos containing materials identified by the Management Asbestos Survey and Refurbishment and Demolition Survey.	
Climate	*GHG Assessment:* - Pre-construction including clearance & demolition activities emissions; land use & vegetation loss activities emissions (carbon sink removal); and water use emissions. - Embodied carbon including raw materials embodied activities emissions and transport of raw materials.	- Low carbon construction methods and low embodied carbon materials will be specified as far as practicable; and zero-emissions delivery and haulage vehicles will be used, where possible. - Maintaining existing tree corridors, where possible to minimise tree clearance.	- Construction phase emissions, with this mitigation commitment, is assessed as a 'not significant' effect with a 'minor adverse' significance.

	- Light rail construction including excavation emissions, construction emissions, construction water use emissions, construction worker travel emissions, and construction waste emissions. - Embodied carbon in the materials required for construction is the largest component of construction activity carbon emissions. - GHG emissions (tCO2eq) contribution due to construction phase will be 0.036% of the carbon budget emissions. - Risk to the construction works from flooding has been mitigated to reduce the likelihood of such an event having a significant adverse impact. - Working practices around standard emergency response and weather informed work planning reduce any potential significant risk for extreme winds to reduce the risk of climate change impacts to not significant.	- Incorporation of concrete with 25% or 50% ground granulated blast furnace slag (GGBS) to reduce the carbon footprint. - Proposed Vignole grass-track indicates >50% reduction in structural concrete. - Proposal to reuse approximately 4,000m3 of site won material to reinstate an existing void at the stabling site. - Larger construction site areas to facilitate optimised construction phase and reduce the transportation of waste. - Provision of satellite compounds to reduce travel distances to reduce the overall fuel consumption associated with the construction phase. - Implementation of nature-based SuDS solutions. - Implementation of a whole-life Carbon Management Plan - Undertake updated Climate Change Risk Assessments. - Other construction mitigation measures such as facilitating sustainable material use, minimise idling of vehicles, and waste management.	
Noise and Vibration	*Potential impacts will arise from:* *- Enabling works & demolition;* *- Sections of rail and trackwork;* *- Utility works;* *- Structures; Road works; and* *- Construction traffic.* - Both local and distant road traffic are the dominant noise sources.	- Contractor will prepare an updated Construction Noise and Vibration Management Plan (CNVMP), which will be formulated for the Construction Phase and used by all contractors based on the mitigation measures outlined in this chapter, and the CEMP. The CNVMP will be a live document.	- With the residual noise levels across the construction sites, noise levels are reduced to below the CNTs in most scenarios - There are a few phases that will result

	- Most construction activities will be undertaken during standard working hours with the possible exception of utilities, roadworks and other works; large structure works and concrete pours track bed and track laying; dewatering excavations; and special/ abnormal deliveries. - Peak HGV and plant activity will take place during demolition works; boundary/ retaining wall construction; drainage and utility/ ducting works; earthworks; road construction; principal structure works (Tolka Valley Park Bridge); park & ride facility; substation construction; track works including stabling works; overhead contact system; and stops and surface finishing works. - There are potentially significant/ very significant construction noise ratings at Hamilton Square, Barnmore Grove, St. Helena's Court, St. Helena's Childcare Centre, Farnham Crescent, Wellmount Parade, Assumption Convent, Aylward Green, Cardiff Castle Road, Mellowes Court, Ravens Court, Finglas Garda Station, North Road, and St. Margaret's Road. - Noise from crushing activities (if they occur) within construction compounds would be of the order of 64dB(A) at the nearest sensitive locations. This would be a negative, not significant and temporary impact. *Construction traffic:*	- As part of the CNVMP, a baseline noise study will be undertaken prior to the commencement of construction works in order to characterise the prevailing noise environment at impacted NSLs. This information will be used to inform the relevant CNTs. - Contractor will be required to take specific noise abatement measures to the extent required and comply with the recommendations of BS 5228–1 (BS 5228-1, 2014). - Contractor will undertake a reassessment of noise levels once further information is available as part of the identification of mitigation measures. This will include details of all anticipated out of core hours work. - Plant items will be required to comply and European Communities Noise Emissions by Equipment for Use Outdoors (Amendment) Regulations 2006 (EC, 2006). - Noise control at source (selection of quiet plant, site layout, attenuation at source, operational control) and noise control along pathway (localised screening to plant items on site, enclosures, site buildings, site hoarding and noise barriers). - Measures are contained in CEMP relating to selection of quiet plant; noise control at source; hours of work; screening; consultation with stakeholders; and monitoring. *Construction Traffic:*	in potentially moderate to significant impacts for temporary periods when works are immediately adjacent to sensitive properties. - Residual effect of noise and vibration during construction is negative, slight to significant and temporary to short term.

	- Effect due to construction traffic along the majority of roads will result in a less than +3 dB increase (negative, short-term and not significant). - Four routes along Finglas Wood Road and Casement Drive are predicted to have increases of between 3dB and 6dB. However, absolute construction traffic noise levels at locations adjacent to the roads are less than 55dB(A). - Noise level from haul road activity during the peak hour period is 61dB LAeq,1hr at locations 25m from the haul road. This is well below the threshold of significance for construction noise. *Construction Vibration:* - Activities with the greatest potential to generate vibration are demolition works, piling for structure foundations and rolling to compact material. - At a distance of 3.5m to 7m, piling activities (including auguring, driving and hammer hitting base of hole) do not result in any significant vibration levels. - Piling work limited to the principal structural works for the Royal Canal and Rail Overbridge, the Tolka Valley Park Bridge and the Park and Ride facility. There are no residential properties within 20m of any of these sites. - Negative, temporary, significant impact is likely for people within buildings within 20m of demolition works.	- Measures to reduce noise from construction traffic by restricting speed limits; maintaining road surfaces; ensuring all vehicles are properly maintained; and securely fastening any covering before leaving site to avoid excessive 'rattling'. *Construction Vibration:* - Minimise obstructions between the vibration source and the sensitive receiver. - Reduce the resistance to bored piles by "mudding in", (lubricating the borehole with a small amount of bentonite slurry). - Communication programme with adjacent building occupants. - Restriction to daytime hours of activities capable of generating significant vibration effects. - Appropriate vibration isolation applied to plant. - Monitoring of vibration levels to avoid significant impacts occurring.	

	- St Helena's House (Resource Centre), historic bridges and the upstanding wall at Patrickswell Court (King William's Rampart) would be vulnerable to vibration impacts.		
Electromagnetic Compatibility	- No impacts from an EMI, EMF or stray current perspective are likely during construction phase. - Significance of effects on all identified receptors will vary between imperceptible to slight. - Largest sources of elevated baseline levels in the AC range will be in the immediate vicinity (within 5m) of on-site generators used to power electronic tools and lighting. Levels will not exceed public exposure guideline limits outside of the construction works and neither are they expected to exceed limits for workers. - Temporary on-site communications and IT infrastructure will result in emissions in the RF range of frequencies. Any such emissions will be governed by EMC and Radio Directives. - DC field perturbations and AC fields from the on-site electrical equipment will not pose any impact to any of the identified receptors. - Change to the baseline EM environment from RF emissions of on-site communications equipment or AC emissions from local power generators is likely and will be constant during the construction but will disappear once the site ceases its activity.	- Carry out an induced voltage study to quantify the magnitude of induced voltage and determine the risk and if technical or operational mitigation measured are required. - Review working procedures to ensure OHL is earthed when personnel are working near the line. - Carry out assessment to determine the separation between the two systems and if there are any EMF risks to passengers/ staff. - Review the radiated emission data for the LRVs to ensure emissions are low at the radio operating frequency. Review the OHL design to ensure it minimises arcing (e.g. no gaps) in the area near the Garda station. - Calculate the field strength from the radio systems at the LRV and wayside equipment. Review immunity levels for LRV and wayside equipment. - Ensure LRV equipment meets EN 50121-3-2 immunity levels. Ensure wayside equipment and LRV stop equipment meets appropriate immunity standard. Ensure substation equipment meets immunity levels in EN 50121-5 or other appropriate immunity standard. - Liaise with utility companies to determine potential assets that may be affected.	- No significant residual impact.

		Produce stray current management strategy in line with EN 50122-2 and best practice and addresses any identified utilities assets. Review design to ensure it is aligned with strategy and minimises stray current. Inspect installation to ensure stray current mitigates are implemented. - Ensure cable routing and substation design minimise EMF levels. Ensure LRT meets the limits in the 'Low Action Levels' of the EMF Directive. - Do not bury spoil or contaminate the ground during the removal of the pedestrian fly-over. The following plans/reports will be developed and Implemented throughout the lifecycle of the proposed Scheme: - EMC Control Plan; - EMC Hazard Analysis & Risk Assessment; - Stray Current Strategy Management Plan; - EMC Simulation Studies; and - EMC Test Plans.	
Operational Phase			
Land & Soils (Soils, Geology & Hydrogeology)	- No potential direct impacts. - As the Luas is an electrified transport system, the operational contamination risks are significantly lower compared to transport vehicles powered by internal combustion engines and hydrocarbon fuel. *Climate Change:*	- Infrastructure will be maintained by TII, or local authority, and will be subject to their management procedures to ensure that the correct measures are taken in the event of any accidental spillages.	- Negligible and imperceptible.

	- Shortening of pathways to groundwater aquifers and an increased risk of potential contaminant mobilisation. Does not alter current assessment of proposed scheme. *Soil & Groundwater Pollution:* - Drainage system will capture surface water, including accidental spillages, which will pass through a pollutant interceptor prior to outfall.		
Land Take	- No additional negative impacts on property as all land take would occur during construction.	- No further mitigation required. - Mitigation measures to reduce any predicted impacts on property due to vibration, dust or changes in visual amenity are addressed in other EIAR chapters.	- No residual operational property impacts on plots associated with land take as addressed under construction residual impacts.
Air Quality	*Impact on Human Receptors:* - Proposed scheme itself is not an air pollutant emission source. - There are properties along the existing roads in the study area that will experience a net reduction in road traffic pollution, e.g. Patrickswell Place, Finglaswood Road, St Margarets Road and North Road (south and north of St Margaret's Road). - There are properties along the existing roads in the study area that will potentially experience a net increase in road traffic pollution, e.g. a short section of Finglas Road (R135), Wellmount Road, Glasanaon Road, Jamestown Road (south and north of Melville Rd) and Charlestown Place.	- No specific mitigation measures required. Predicted air pollutant concentrations along Porch diverted traffic routes will remain in compliance with ambient air quality standards. - Proposed scheme is electrified and there are no air pollutant emissions.	- Neutral impact at all modelled receptors.

	However, there will be a 'neutral' impact on nitrogen dioxide (NO2) and particulate matter (PM10 & PM2.5) concentrations in these areas. *Impact on Ecological Receptors:* - Impact of the proposed scheme crossing the Royal Canal pNHA will be insignificant in terms of local air quality because the proposed scheme is electrified.		
Climate	- Proposed scheme projected to result in an approximate reduction of 10,000 car trips daily. *GHG Assessment:* - Operational power supply equating to approx. 1,035 tCO2eq (3,440,000 kWh) per annum. - Electricity usage for the maintenance and operation of the two substations, stops, and park & ride facility equating to approx. 8,177.1 tCO2eq per annum. - Overall decrease in annual road traffic CO_{2eq} emissions (4% per annum within the study area). - Operational phase GHG emissions will be 0.029% of the carbon budget emissions. *Climate Change Risk Assessment:* - Proposed scheme design ensures that the potential for fluvial flooding and/or pluvial flooding due to occurrences of heavy rainfall have been minimised to a very low potential of occurrence.	- Habitat retention creation and enhancement. Carbon storage associated with habitats and gains in vegetated land. - Inclusion of a solar array on the roof of the park & ride.	- Operational phase emissions, with the mitigation commitments, is assessed as a 'not significant' effect with a 'negligible' significance, (impact significance must be taken for the project as a whole over its lifecycle rather than individual phases). - The impact on climate due to the overall reduction in road traffic GHG emissions is long-term and beneficial due to expected modal shift.

	- Extreme weather events with potential to damage to rail track, pavements, utilities or other assets are extremely rare in Ireland, with very low potential of occurrence.		
Noise and Vibration	*Potential impacts will arise from the following sources and activities:* *- Noise from operational LRTS;* *- Operational noise associated with substations and LRT Stop Cubicles;* *- Car parking and traffic noise at the Park & Ride facility; and* *- Changes in road traffic noise along surrounding road network.* *Noise from Rail:* - Highest operational daytime rail noise impacts are significant at NSLs in proximity to the track at St Helena's Childcare Centre (moderate during peak). - Some commercial operators will experience a moderate impact but mitigation not proposed for those locations. - All locations experience a slight or not significant impact for night-time periods, including peak (between 05:00 and 07:00). Ambient levels are higher for peak. *Vibration from Rail:* - Results of monitoring on existing Luas network have found that measured Vibration Dose Value levels from operational Luas movements do not exceed the thresholds for adverse impacts, even at properties immediately adjacent to the track at	- Noise mitigation required at St. Helena's Childcare Centre to include new solid sound boundary treatment. - Impact of rail noise corrugation, vibration and squeal can be minimised through preventive and corrective rail grinding, rail lubrication, and floating slab track detail. - Advanced notice will be provided to affected residents of any rail maintenance activities are scheduled over night-time periods.	- With noise mitigation measures, daytime LAeq,16hr and daytime peak LAeq,1hr values are less than or equal to the threshold of significance at all residential or educational receptors. Residual impact is assessed to be negative, not significant and long term. - With mitigation, rail noise impacts are reduced to negative, slight and long term at all residential locations when assessed over the full day and night periods as well as during peak hour periods. - A negative, slight to moderate but not significant and long-term impact is calculated at other

	comparable speeds and track types to those associated with the proposed scheme. - Previous studies found that sections of track where decelerating, stopping and accelerating take place had the potential to generate perceptible vibration levels within occupied buildings at a distance of 4.5m or less from the track. Closest receptor where decelerating, stopping and accelerating occur, is the dwelling at the junction of North Road and St Margaret's Road - a distance of 5.8m from the track. - There is a risk of adverse vibration levels being generated within buildings close to this curved section of track at Finglas Village stop. Mitigation is therefore proposed. *Substations and LRT Stop Cubicles:* - No significant noise emissions expected from the substations (less than 42dB LAeq at 10m from the building for 110 & 220 kV). - This noise level at substations and LRT stop cubicles is considerably lower than the prevailing background noise level and therefore the noise impact is expected to be imperceptible at nearest sensitive locations. *Noise from ongoing maintenance:* - On-going condition-monitoring of assets. - Inspection and maintenance of electrical and mechanical equipment. - Rail re-profiling and rail grinding. - Preventative maintenance for other equipment including 'maintenance by replacement' whereby components are		non-residential locations adjacent to the proposed scheme alignment. No mitigation required. - 20 residential or educational NSLs exceed the WHO recommended rail noise threshold of 54dB Lden. Pre-existing levels are such that rail noise is not contributing any significant amount to the overall noise environment. - 26 NSLs with night-time sensitivity exceed the WHO night-time recommended rail noise threshold of 44dB Lnight. When added to prevailing ambient noise environment, impact is slight. - Residual noise impacts at closest NSLs to tram stops as a result of pedestrian activity; from the park & ride; from substations and LRT stop cubicles are

	exchanged and serviced offline in a depot or factory. - Planned periodic refurbishment and replacement of assets. - General housekeeping, cleaning including all public areas, pest control and weed control. *Noise from people accessing stops:* - Only the St Helena's and St Margaret's Road Stops are within 25m of NSLs. Mitigation to be provided at St. Helena's and existing baseline at St. Margaret's is dominated by road traffic noise. *Noise from Park & Ride:* - Noise levels associated with the Park & Ride car parking activities, traffic flow and rail sources have been combined to obtain a cumulative noise level. Change in noise level at nearest NSLs will be negative, slight to imperceptible and long-term. *Noise from additional road traffic on surrounding roads:* - Noise level at various junctions for the Do Minimum scenarios have been assessed against the predicted traffic noise levels for the Do Something scenarios for the year opening year of 2035 and the design year of 2050. - For the year 2035, 95.1% of road links experience a change in noise level of less than 3dB.		negative, slight but not significant and long term. - Residual noise from maintenance of the railway will negative, slight to moderate but not significant and brief. - Residual noise impacts due to changes to road traffic on the local road network are long-term, negative and not significant impact.

	- Seven road links will experience an increase in noise level ranging from 3 to 10 dB, four of which are within the Casement Drive area – noise impact not considered significant. - For the year 2050, 94.3% of road links will experience a change in noise level of less than 3dB. - 15 road links are identified to experience an increase in noise level ranging from 3 to 9dB. Considering the absolute traffic noise level in the context of the baseline noise environment it is concluded that the resulting impact is not significant along these roads. *Operational noise from Luas Broombridge Hamilton Depot:* - Noise impacts from the extended stabling area are not expected to be significant, as located away from sensitive receptors and, when stabled, noise generating activity is minimal. LRVs will also travel at low speeds in the area.		
Electromagnetic Compatibility	- Proposed scheme itself could be susceptible to external EMF that are generated by sources such as electricity cables and local RF transmitters. - Stray currents could potentially occur on nearby receptors including buried tanks, water pipes and utilities running parallel to the system. Entry / exit points of potential receptors for the stray current may	- As above. - System contractor(s) will ensure that the electrical systems, communications, and equipment associated with the proposed scheme comply with the EMC Directive 2014/30/EU and the Radio Equipment Directive 2014/53/EU. - Location of radio transmitters will be such to ensure that the levels of emissions do	- No significant residual impacts.

	experience corrosion over time without adequate mitigation measures. - LRT systems are known to generate transient emissions that are not controlled by EMC regulations. These can pose a threat to the operation of nearby electrical and electronic equipment. - Large electrical installations can also cause voltage fluctuations on the public supply that cause the phenomenon of flicker when not mitigated correctly. - Potential EMI sources arising from the operation of the proposed scheme include radiated interference from the DC magnetic fields, AC magnetic fields and radiofrequency electric fields. - Stray current is generated from the traction system. - Significance of effects from DC Magnetic Fields during operational phase is neutral. - Elevated levels of E-Fields can be expected at the substations but will be within guideline limits for exposure. - Significance of effects for public exposure to AC fields has been determined to be imperceptible with a quality of effects classed as neutral. - Radiofrequency emissions levels will be controlled to levels that will ensure the absence of interference with radio, TV, and telecommunications apparatus. - Significance of effects from RF and Microwave Fields during operational phase is neutral.	not cause interference with electrical and electronic equipment. - Proposed scheme itself will act as a sink for the stray currents already present in the subterranean environment while having its own stray current emissions mitigated through its design.	

	- For all identified receptors, the significance of effects for stray currents has been rated as slight or imperceptible. - HV substations will be above ground and are considered significant in relation to EMR for the baseline environment.		

Do Nothing:

- Proposed scheme would not be constructed, resulting in no impact to existing soils, geology, or hydrogeology baselines.
- There would be no impact arising from land take. Some urban impacted areas may form part of development sites.
- For noise and vibration, and air quality, the do minimum scenario (including any transportation schemes which have taken place, been approved or have significantly progressed through the planning process), without the proposed scheme in place is compared against the do something scenario with the proposed scheme in place.

Monitoring:

- Competent person to manage and supervise soil excavation and removal from the site.
- Experienced environmental engineer or scientist during bulk excavation works, primarily to identify any previously unidentified contamination.
- Regular testing of excavated soils to monitor the suitability of the soil for re-use.
- Monthly monitoring of construction phase dust deposition levels as part of Dust Management Plan. Monitoring shall be carried out at a minimum of three locations at each construction compound and further monitoring locations shall be designated at sensitive receptors along the proposed scheme alignment.
- During the construction phase, the Contractor will be required to carry out noise and vibration monitoring at representative NSLs to evaluate and inform the requirement and/or implementation of noise and or vibration management measures. Full monitoring and auditing programme forming part of the CNVMP will include an alert system for threshold exceedances, remote access and a platform for sharing monitoring results between the contractor, TII and DCC.
- Continued monitoring of the performance of the traction circuit with respect to current returns to the substation will be required.
- Monitoring of the earthing system and stray currents to ensure that potential faults in these mitigation measures or degradation over time is adequately detected.

Cumulative Effects:

- Due to the separation distances, and their nature and scale, the 43 other developments considered for cumulative impacts would not result in any likely significant cumulative impacts on Land & Soil with the proposed scheme.
- Potential for cumulative impacts in terms of land take clashes if construction was to overlap with DART+ Programme West, Royal Canal Greenway and the proposed extension at Manhattan Peanuts Ltd.

- Potential for cumulative air quality impacts with Metrolink, Dart +, BusConnects, proposed multi-modal transport scheme along a section of the N3 between the M50 and Clonee, and the Royal Canal Greenway. Given that standard dust mitigation measures will be implemented for each of these developments, there will be no likely significant cumulative dust impacts. Distance to these developments is also substantial and dust impacts are expected to be localised. Other developments also have the potential to reduce cumulative private car emissions. - Climate assessment identified major transport projects as those with the potential for cumulative significant impacts on GHG emissions during the operational phase for improvements in connected public transport infrastructure. Potential to reduce private car emissions through reduced congestion, which could lead to an overall reduction in greenhouse gas emissions from transport. - Potential cumulative noise impacts if construction and foundation works for six other developments were to take place at the same time as the construction phase of the proposed scheme. Additional mitigation not required beyond that specified and no significant impacts predicted. - Likely significant cumulative impacts on electromagnetic interference are not expected to occur.

Table 14.10.1 – Consideration of Impacts, Significance and Mitigation Measures for Land, Soil, Water, Air and Climate

The Assessment: Direct and Indirect Effects

14.10.16. I have examined, analysed, and evaluated Chapters 10, 11, 12, 13, 14, 15 and 16 of the EIAR, all of the Appendices to these Chapters and the associated Construction Environmental Management Plan and Water Framework Directive Compliance Assessment. I am satisfied that the applicant has provided sufficient survey data to enable assessment of likely effects on land, soil, water, air and climate. Further, having regard to the detailed assessment carried out, the location of the development and the site surroundings, together with the proposed mitigation measures, which are standard good practice measures and which are proven to be effective in particular at preventing adverse effects on water flows, hydromorphology and water quality, I am satisfied that no significant, adverse direct, indirect, or cumulative effects on soils, geology and hydrogeology; hydrology; air quality; climate; and noise and vibration will arise as a consequence of the development.

14.10.17. The proposed scheme will not require deep or extensive excavations and construction will primarily comprise of shallow earthworks carried out above the water table. Potential impacts could occur during the construction phase on soils, geology and hydrogeology from surplus soil arising from earthworks; potentially contaminated soils arising from earthworks during construction; importation of fill; loss of soil cover, soil erosion and compaction; contamination of existing soils, geology and groundwater by construction activities; and potential disruption to an existing well. I am in agreement that appropriate mitigation measures can be implemented to avoid or reduce negative impacts on land, soils, geology and hydrogeology during the construction phase and it is expected that there will be no significant residual construction impacts.

14.10.18. There will be no direct impacts on land, soils, geology and hydrogeology during the operational phase. Minor indirect impacts may include accidental leaks or discharges resulting in potential contamination of soils and groundwater. With the implementation of the proposed design, no additional mitigation measures for land, soils, geology and hydrogeology are considered necessary and operational phase infrastructure will be subject to the management procedures of TII or the local authority.

14.10.19. Construction phase impacts on land take will include acquisition of properties on a temporary basis; acquisition of properties on a permanent basis; and demolition of structures, including boundary walls / fencing. During the operational phase, there would be no additional negative impacts on property as all land take would occur during construction. During the design process, I agree that every effort has been made to minimise impacts through careful consideration of alternatives. Owners will be entitled to submit a claim for compensation where land and property is necessary in order to ensure the delivery of the proposed scheme in its entirety.

14.10.20. Potential surface water impacts during include construction runoff and watercourse disturbance due to site clearance, earthworks, utility diversions, road resurfacing, junction realignments, construction of watercourse and canal crossing structures, alterations to existing footpaths and general LRT construction works, together with new footpaths and cycleways, and remediation works to the existing Integrated Constructed Wetland in Tolka Valley Park. There are potential surface water impacts during the operational phase from changes in surface water runoff, increased hardstanding and watercourse disturbance.

14.10.21. A Surface Water Management Plan and CEMP have been developed to detail the control and management measures for avoiding, preventing, or reducing any significant adverse impacts on the surface water environment during the construction phase. Most impacts during the operational phase will be positive due to the amount of newly introduced SuDS and attenuation features along the scheme. The WFD assessment has determined that proposed scheme will not compromise the achievement of the objectives of the WFD for any of the surrounding waterbodies. A Site-Specific Flood Risk Assessment confirm that the proposed bridge crossing over the River Tolka will have negligible impacts on the river's flood levels and that there will be no material increase in flood risk due to the proposed scheme. Overall, I am satisfied that it has been adequately demonstrated there will be no likely significant residual impacts for surface water receptors from the construction or operational phase of the proposed scheme.

14.10.22. The main potential impact on air quality during the construction phase is from construction dust emissions and nuisance dust deposition at the nearest air quality sensitive receptors. There is also potential for increased construction traffic emissions. During the operational phase, altered traffic flows on the surrounding

road network have the potential to impact on air quality. The proposed scheme itself will be powered by electricity, which is more environmentally friendly than combustion engine transport. Appropriate construction dust mitigation measures have been outlined for the construction phase in the CEMP. I agree that with the implementation of these measures, the impact of emissions from the proposed scheme will not be significant. It has also been appropriately demonstrated that the effects of emissions from altered traffic flows on the surrounding road network will not be significant.

14.10.23. A Greenhouse Gas (GHG) assessment and Climate Change Risk Assessment are carried out for the proposed scheme in the EIAR. TII's carbon calculation tools was used to assess lifecycle carbon emissions and emissions associated with changes in road traffic volumes. During the construction phase, there are potential impacts from embodied carbon used for construction, embodied GHG emissions from land clearance activities, embodied carbon from materials and transport, and waste production. Mitigation measures have been incorporated into the construction design aimed at reducing the embodied carbon, e.g. reuse of materials, maximising tree corridors and use of grass track. There is a predicted positive impact on climate during the operational phase due to the overall reduction in road traffic GHG emissions. The proposed scheme will contribute towards the national target of 500,000 additional trips by walking, cycling and public transport per day by 2030.

14.10.24. Baseline surveys determined that the main source of noise within the study area is road traffic, with elevated noise levels being particularly noticeable on St Margaret's Road and the junction of Broombridge Road / Ballyboggan Road. Noise and vibration impacts will occur during the construction phase from utility diversions, demolitions, earthworks, principal structure works, road / track works and construction traffic routes. Mitigation measures during construction will include the selection of a quieter plant, the consideration of the construction working hours, the appropriate use of acoustic enclosures or screens, and the monitoring of vibration at identified sensitive receptors. There will nonetheless be moderate to significant impacts for brief periods when works are immediately adjacent to sensitive properties. Operational phase impacts will include the noise and vibration from operating trams; maintenance activities; car parking, plant and traffic noise at the Park & Ride facility; and changes in road traffic noise levels along the proposed

scheme. Following implementation of mitigation measures, I concur that there will be no significant residual noise or vibration impacts during construction or operational phases of the proposed scheme.

14.10.25. Finally, it is recorded that the proposed scheme will generate three types of electric and magnetic fields known as; Direct Current (DC) fields (generated by train power); Alternating Current (AC) fields (generated by the electricity drawn from the Electricity Grid); and Radiofrequency (RF) fields (generated by radio systems). Following mitigation, there will be no residual impacts during construction, and in the operational phase, residual impacts will be reduced to non-significant levels.

14.10.26. A total of 43 other developments were assessed for cumulative impacts and such impacts may occur in some cases if construction periods were to overlap. However, standard mitigation measures will be implemented for each of these developments and no significant cumulative impacts are predicted.

Conclusion

14.10.27. Having regard to the foregoing, it is considered the main significant direct and indirect effects on land, soils, water, air and climate are as follows:

- Beneficial cumulative impact of the proposed Luas Finglas scheme on **Climate** during the operational phase due to the overall reduction in road traffic GHG emissions.
- Adverse impacts on **Land** through acquisition of properties on a temporary basis; acquisition of properties on a permanent basis; and demolition of structures, including boundary walls / fencing. Impacts have been minimised through careful consideration of alternatives and owners will be entitled to submit a claim for compensation where land and property is necessary in order to ensure the delivery of the proposed scheme in its entirety.
- Potential impacts on **Water** during construction from runoff and watercourse disturbance. A Surface Water Management Plan and CEMP have been developed to detail the control and management measures for avoiding, preventing, or reducing any significant adverse impacts on the surface water environment.

- Potential impact on **air quality** during the construction phase is from construction dust emissions and nuisance dust deposition. Appropriate construction dust mitigation measures have been outlined for the construction phase in the CEMP.
- Potential for construction and operational **noise and vibration** impacts. Following mitigation, there will be moderate to significant impacts for brief periods when works are immediately adjacent to sensitive properties.

14.11. Material Assets, Cultural Heritage and the Landscape

Issues Raised

14.11.1. Submissions were received by the Board on various issues relating to material assets, cultural heritage and the landscape. Material assets for the purposes of the EIAR includes infrastructure and utilities, traffic and transport, and resource and waste management. Cultural heritage incorporates resources of archaeological, architectural, cultural and industrial heritage significance. The landscape includes a landscape and visual impact assessment of the proposed scheme.

14.11.2. Many of the submissions on the proposed scheme concerned matters of access, traffic and transport. These were mostly of a local nature and related to revised access arrangements to individual properties. It was considered in some submissions that proper traffic movement studies have not been carried out and there is a lack of technical information submitted to enable a proper assessment of the proposed Luas extension. There are also concerns regarding the loss of parking and the uplift of traffic on certain other routes as a result of the proposed scheme. Alternative routes for the proposed scheme were raised, together with the potential for linkage to Metrolink and consideration of tie-in opportunities with Luas Tyrrelstown. Other concerns were highlighted on pedestrian/ cyclist provisions and junction reconfigurations.

14.11.3. In terms of architectural heritage, the Conservation Section of Dublin City Council submit that the proposed work should, where possible avoid any direct material losses of historic fabric and take into account the setting of protected structures and other historic buildings, structures and settlements. For any proposed works to the existing stone bridge at the Royal Canal, a conservation impact statement and conservation method statement should be carried out by a RIAI accredited, or

equivalent Conservation Architect Grade 1 or Grade 2. More detail of works immediately surrounding or impacting the bridge, including cross sections, landscaping, access and protective measures is also requested by Dublin City Council.

14.11.4. The Archaeology Section of Dublin City Council refers to the 14 cultural heritage constraints of high importance including town defences, a historic town, a monastic enclosure, houses, wells, bridges, canal, etc. The potential archaeological impacts associated with the construction and operational phases are noted, and the proposed archaeological mitigation and monitoring measures outlined in the EIAR are concurred with. The Department of Housing, Local Government and Heritage advises that archaeological conditions of any grant of permission should align with sample conditions C4 and C5 as set out in OPR Practice Note PN03: Planning Conditions (October 2022), with appropriate site specific additions/ adaptations based on the particular characteristics of this development and informed by the findings of the EIAR.

<u>Examination, Analysis and Evaluation</u>

14.11.5. Chapters in the EIAR pertaining to materials assets, cultural heritage and the landscape include Chapter 17 – Material Assets: Infrastructure and Utilities, Chapter 18 – Material Assets: Traffic and Transport, Chapter 19 – Material Assets: Resource and Waste Management, Chapter 20 – Cultural Heritage, and Chapter 21 – Landscape and Visual Amenity. Associated appendices include the following:

- Appendix A18.1 – Transport Modelling Report
- Appendix A18.2 – Pedestrian and Cycle Infrastructure Impact Assessments
- Appendix A20.1 - Archaeological Monitoring Report GI
- Appendix A20.2 - Archaeological Monitoring and Test Trench Excavation Report
- Appendix A20.3 - Photographic Records
- Appendix A21.1 - Arboricultural Impact Assessment
- Appendix A21.2 - Urban Integration Report
- Appendix A21.3 - Photomontages

14.11.6. For the **Material Assets (Infrastructure and Utilities)** section of the EIAR, existing utility information was requested from utility companies and service providers. This information was used to determine any potential clashes with the permanent and temporary works required for the proposed scheme. Consideration was also given to the requirement for connections to public utilities during construction and operational phases.

14.11.7. The baseline environment for infrastructure and utilities includes Broombridge transport interchange, navigable canal waterways; ESBN transmission and electricity lines (high, medium and low voltage) and associated infrastructure; Gas Networks Ireland transmission and distribution gas mains (high, medium and low pressure) and associated infrastructure; Uisce Éireann potable water mains and associated infrastructure; Uisce Éireann sewer lines (foul and combined sewers) and associated infrastructure; Local Authority surface water drainage network and associated infrastructure; Eir, Enet, BT and Virgin Media telecommunications lines and associated infrastructure; and Local Authority traffic signal and public lighting ducting and associated infrastructure.

14.11.8. Data collection and collation for **Material Assets - Traffic and Transport** was undertaken from the NTA count database and TII traffic counters. Traffic surveys were also conducted in the study area to include Automatic Traffic Counts (ATCs) at 6 locations and Junction Turning Counts (JTCs) at 14 locations. TomTom Road Journey Time Data was sourced for journey times using vehicle position data from GPS-enabled devices. Three levels of transport modelling were carried out to determine the baseline and future scenarios for the proposed scheme. The NTA's East Regional Model (ERM) for strategic assessment and a Local Area Model (LAM) was used to provide a more detailed understanding of traffic movement within the study area. A microsimulation model was then developed for the area to the northern end of the Luas Finglas alignment where there is likely to be the largest interaction between the Luas and road infrastructure during operation. Qualitative assessments have been carried out for pedestrian infrastructure, cycling infrastructure, and bus services. The modelling tools have been used to carry out quantitative assessments on people movement, public transport performance indicators, and general traffic. Level of service impact assessment is used to outline the changes in conditions between the Do Minimum and Do Something scenarios.

14.11.9. In terms of the baseline environment, transport and commuting along the proposed scheme is dominated by private car transport. In general, there are footpaths along roads but there is a lack of controlled pedestrian crossings. Cyclists mostly share traffic lanes in both directions and there are no bus lanes along the route. There is an existing off-road cycle track through Tolka Valley Park and there are various pedestrian pathways through greenspaces along the route. The main roads along the corridor, for which the proposed scheme will intersect, are Broombridge Road, Tolka Valley Road, St. Helena's Road, Wellmount Road, Patrickswell Place, Cardiff Castle Road, Mellowes Road, Casement Road, North Road and St. Margaret's Road. These roads are generally single carriageway in both directions. The main junctions are the roundabout at Finglas Road/ St. Margaret's Road/ North Road and the signal controlled junction at Charlestown Place/ St. Margaret's Road.

14.11.10. The assessment of **Material Assets - Resource and Waste Management** identifies the types of waste generated by the proposed scheme and the potential for reuse of materials. Data collection and collation included a review of the national and regional availability of construction aggregates; a review of existing and proposed waste management facilities; a description/ estimate of the typical waste materials/ arising; and a detailed ground investigation campaign to ascertain site-specific information on the local ground conditions, including the potential presence of contaminated ground.

14.11.11. Ireland has abundant natural reserves of high quality aggregates, which are the basic raw materials for concrete products. Materials will be reused on site and sourced from local suppliers to minimise costs and to support the local economy. The proposed scheme lies within the Eastern Midlands Waste Region. The C&D waste and excavations generated by the proposed scheme will be primarily inert and non-hazardous waste; however, it is understood that a historic landfill operated within Tolka Valley Park. The EIAR sets out details including capacity at soil recovery facilities, licenced waste transfer stations, inert landfill licenced facilities, non-hazardous landfill licenced facilities, and existing waste facilities licenced to accept asbestos.

14.11.12. **Cultural Heritage** refers to archaeological constraints, architectural heritage constraints, including associated lands, industrial heritage, vernacular structures, objects, underwater archaeological remains, historic street furniture and paving,

museums, statues and commemorative plaques. Intangible cultural heritage includes folklore, oral tradition, sports, religion, traditional crafts, language and historical associations, which may be multifaceted in nature and incorporate attributes of archaeological, architectural, cultural and industrial heritage significance. Archaeological and architectural conservation field surveys of the study area were carried out in April 2021, April and June 2022 and October 2023. Site investigations were also conducted and consultations with relevant stakeholders took place.

14.11.13. A baseline assessment of the prehistoric periods (c. 8000BC–AD 400), early medieval period (c. AD 400–1190), Anglo-Norman and later medieval periods (c. AD 1171–1550), post-medieval period (c. AD 1550–1850), and the early modern period (c. 1850 to present) is carried out in the EIAR. A field survey of a number of accessible extant structures located within the environs of the proposed scheme includes Broome Bridge (CHC001.1) and Royal Canal (CHC003), Finglaswood Bridge (CHC009), St Helena House (CHC020), and King William's ramparts (CHC027). In total there are 14 cultural heritage constraints of high importance identified within the study area (town defences, a historic town, a monastic enclosure, houses, wells, bridges, canal, etc), as well as 14 cultural heritage constraints of medium importance (Areas of Archaeological Potential, conservation areas, railway structures, religious building, memorials, one sculpture, etc.). There are also 14 cultural heritage constraints of low importance and 10 cultural heritage constraints of very low importance. Fifteen levelled cultural heritage constraints of neutral importance have been identified.

14.11.14. In terms of **landscape and visual**, the proposed scheme passes through open green spaces, various of parks and along roads. Surrounding uses are mostly residential and commercial. The Landscape and Visual Impact Assessment has been informed by the findings of the cultural heritage assessment, as well as an Arboricultural Impact Assessment and a number of photomontages. The study area was identified using a Zone of Theoretical Visibility and field surveys were carried out to visit the locations of all known constraints, open spaces, and areas of significant vegetation. Jan Gehl survey data 2022-2023 was also used to verify amenity use and movement in the open spaces. An Urban Integration Report provides a summary of the design principles and detail on the urban approach, with descriptions

and illustrations on design palettes and elements of the tramway's landscape and urban realm design including the tram stop design.

14.11.15. For the baseline assessment, ten local character areas have been identified to reflect the local-scale changes in vegetation and built environment and the presence of elements of landscape sensitivity. These are the Royal Canal, Broombridge Road/ Industrial Estate, Tolka Valley Park, St. Helena's, Farnham Park, Wellmount Road, Finglas Main Street West, Mellowes Park, Finglas Road Corridor and Charlestown/ St. Margaret's. Only the Royal Canal and Tolka Valley Park are assessed to have a high baseline sensitivity. There are no protected views or prospects overlapping the ZTV of the proposed scheme.

14.11.16. Table 14.11.1 below summarises the likely significant effects of the proposed development on Material Assets, Cultural Heritage and the Landscape as identified in the EIAR.

Potential Material Assets, Cultural Heritage and Landscape Impacts	Potential Effects in the absence of Mitigation	Mitigation and Monitoring Measures	Residual Impact
Construction			
Material Assets (Infrastructure and Utilities)	- Activities related construction/ installation of stops, tracks, substations, ancillary roadworks and paved areas; structures; Park & Ride facility; earthworks; and construction compounds (e.g. Broombridge) will particularly have impacts on utility services. - Main impacts will arise from the requirement to divert existing utilities. This may result in temporary local interruptions to electricity and water provision, wastewater collection, gas provision, and telecommunications. - There will be some demand on existing utilities due to construction activities. - Utility diversions required crossing both the canal and railway line which will be completed by directional drilling. - Requirement to temporarily restrict access along the towpath of the canal during construction.	- Works have been designed to avoid interactions with major utility infrastructure, where possible. - Where there are interfaces with existing utility infrastructure, and protection in place is not viable, diversion measures are proposed to prevent long-term interruption to the provision of the affected services. - Proposals will ensure that efforts are made to ensure disruption to any utility service is minimised and where necessary, subject to service level agreement, will take alternative measures to ensure continuity of the service whilst diverted. - Consultations have been undertaken with all the major utility companies regarding the design and consultations will continue through the design development. - Latest service records will be sought, service providers will be consulted and localised confirmatory surveys will be undertaken to verify the locations of services. - Precautions will be implemented by the contractor to protect infrastructure from damage, in accordance with best practice	- Impact magnitude will reduce to low and the significance of effects will decrease to moderate to slight.

		methodologies and the requirements of the utility companies, where practicable. - Protection measures will include warning signs and markings indicating the location of utility infrastructure, safe digging techniques, and isolation of the section of infrastructure. - Notification of any interruptions to services to impacted properties.	
Material Assets (Traffic & Transport)	- Expected construction programme for main works including testing and commissioning is 3.5 years. To minimise traffic disruption, work will be carried out on more than one section at any one time. - Assumed that all national and regional roads in the immediate vicinity of the proposed scheme would be used by construction vehicles. A number of local roads will also be used. - Pedestrians and cyclists may be temporarily impacted by construction activities along the proposed scheme corridor. - Some existing bus stop locations will need to be temporarily relocated to accommodate the works. - When roads and streets are being upgraded, there will be some temporary disruption / alterations to on-street and off-street parking provision, and access to premises in certain locations. - Some localised temporary lane closures, road closures and diversions will be necessary to facilitate construction.	- Implementation of the CEMP will ensure disruption and nuisance are kept to a minimum. - Construction Traffic Management Plan (CTMP) to demonstrate the manner in which the interface between the public and construction-related traffic will be managed and how vehicular movement will be controlled. Impacts to public road network will be minimised and transport related activities can be carried out as safely as possible and with the minimum disruption to other road users. - Project Supervisor for the Construction Stage shall co-ordinate the implementation of the CTMP. - All works will be undertaken in accordance with DTTS 'Traffic Signs Manual, Chapter 8 Temporary Traffic Measures and Signs for Roadworks' and associated guidance. - Where footpaths and cycle facilities are affected by construction, a safe route will be provided past the work area, with provisions for matching existing facilities.	- Negative, slight and temporary for pedestrians, public transport, and parking and access. - Negative, moderate and temporary for cyclists and general traffic.

	- Significant impacts due to general traffic redistribution away from the study area are not anticipated. - Generation of additional construction traffic (HGVs) for clearance of existing site material and waste; earthworks cut/ fill operations; deliveries of construction material; and removal of construction waste material.	- Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works. - Access for general traffic to existing residential and commercial units immediately adjacent to the proposed scheme is to be accommodated throughout. - Construction Stage Mobility Management Plan is included in the CTMP and includes measures to actively discourage personnel from using private vehicles to travel to site. - CTMP will control construction vehicular movement, including restrictions on the number of HGVs accessing and egressing the construction works throughout the day to mitigate the impacts to general traffic on surrounding roads.	
Material Assets (Resource & Waste Management)	*Demolition:* - Demolition waste will be classified as either inert or non hazardous wastes including concrete, bricks, glass, and metals. - Predicted hazardous wastes include asbestos containing materials, bituminous oils, chemicals, and waste electrical and electronic equipment. - Predicted total of 28,259 tonnes key demolition waste generated from the proposed scheme. 95% to be reused, recycled or recovered. - Potential impact is slight adverse prior to mitigation. *Excavation:*	- All material will be considered for reuse for construction in accordance with Article 27 of the Waste Directive Regulations. - Overall recovery rate of 95% can be achieved for C&D wastes. - All material generated by the proposed scheme will be managed in accordance with circular economy principles and the waste hierarchy, with prevention, reuse, recycling, and other recovery methods favoured over disposal. - Five key principles are minimise resource consumption and waste generation; design for reuse and recovery; design for materials optimisation; design for off-site	- Residual impacts will not be significant.

	- Proposed scheme will involve shallow excavation and associated earthworks. - Earthworks including excavation of station boxes section, open cut, and cut and cover sections will take place and will result in large quantities of excavated soil, stone and made ground. - Excess materials will require placement elsewhere within the proposed scheme or removal off-site. - Excavated materials likely to be generated by the proposed came are classified as inert, non-hazardous and hazardous. Predicted that approximately 900 tonnes would be classified as contaminated. - Potential impact is slight adverse prior to mitigation. *Construction activities:* - Construction materials will include soil, aggregates, asphalt, concrete, steel, plant, fuel, oils, material finishes, glass, and wood. - Potential waste includes surplus materials from over-ordering or mishandling of construction materials, packaging waste, mixed municipal waste and food waste from construction staff. - Hazardous wastes from the maintenance of construction machinery or with chemicals required as part of construction processes. - Potential impact is slight adverse prior to mitigation. *Consumption of materials during construction:*	construction; and design for the future (deconstruction and flexibility). - All waste will be managed in accordance with the waste hierarchy as set out in the Waste Framework Directive (2008/98/EC), in such a way as to prevent harm to human health, amenity and the environment. - CEMP details requirements for contractor to update the Construction & Demolition Resource and Waste Management Plan (C&D RWMP) with site specific information. - C&D RWMP roles and responsibilities with regards to waste management; key materials and estimated quantities of waste generated; waste management measures; procedures for communication; environmental management procedures; and environmental management. - For waste excavated material, there will be three separate stockpile storage areas, namely an area for the storage of material to be reused within the proposed scheme, an area for storage of by-product material, and an area for excavated material which is to be removed from site. - Inert excavated waste will be reused on site for backfilling such as bunding and landscaping purposes. - 30,000 tonnes of non-hazardous excavated material would be classified as a waste and would need to be managed off site, i.e. sent to landfill. - Approximately 900 tonnes of excavated hazardous waste would be generated by the proposed scheme. Assumed that	

	- Commitment to source at least 20% (by weight, volume, value) of materials from re-used or recycled sources. *Hazardous Waste:* - Hazardous wastes (e.g. oils, batteries, solvents, excavated material) will comprise a relatively small proportion of the total construction waste. - Potential source of contamination across the whole proposed scheme alignment is from made ground. - Historic landfill may have operated within Tolka Valley Park but was decommissioned and capped by DCC during the 1970s. Material is classified as non-hazardous (Class U1) but allowance for encountering Class U2 material within Tolka Valley Park will also be considered. - Assumed that approximately 52% of the hazardous waste (excluding soils) and approximately 99% of contaminated soils will be treated, with remaining material exported. All asbestos will be sent off-site for disposal. - Per- and Polyfluoroalkyl Substances (PFAs) are likely to be present in small amounts in some materials used in the light rail sector including, for example, lubricants and hydraulic fluids. - Potential impact is assessed as slight adverse. *Other waste types:*	approximately 52% of the hazardous waste (excluding soils) and approximately 99% of contaminated soils will be treated, with remaining material exported. All asbestos waste will be sent for off-site disposal. - Product that contains PFAs will be managed in accordance with environmental standards to prevent spillage and/or environmental risks. - MSW will be managed in accordance with the waste hierarchy.	

	- Surplus material and waste may occur where material supply exceeds material demand. - Municipal solid waste (MSW) will be generated by construction workers. - Small quantities of waste would be generated through ESDN works.		
Cultural Heritage	- Potential to result in very significant, direct, adverse permanent impacts on CHC026 (Archaeological Site: Finglas ZAP), CHC027 (Archaeological Site: Town defences (King William's ramparts)). - Potential to result in significant, direct, adverse permanent impacts on CHC001.8 (Sculpture); CHC005 and CHC033 (AAPs); CHC015 (Archaeological Site: Finglaswood House); and CHC054 (Memorial Garden). - Potential to result in moderate, direct, adverse permanent impacts on CHC0201.1 and CHC024 (Demesne features); CHC028 (LRV poles); and CHC042 (Townland boundary). - Potential to result in moderate, indirect, adverse short-term impacts on CHC001 (MWGR); CHC001.1 and CHC009 (Bridges); CHC003 (Royal Canal); CHC003.1 (Towpath); CHC004 and CHC012 (CA); CHC020 (St Helena House); CHC027 (Town defences (King William's ramparts)); CHC031 (Jehovah's Witness Kingdom Hall); and CHC039 (Liam Mellows memorial). - Potential to have slight, direct adverse permanent impacts on CHC022 (AAP);	- TII Project Archaeologist has been appointed to oversee and manage the archaeological elements of the proposed scheme. - All contractors and cultural heritage consultants shall comply with the TII Luas Finglas Cultural Heritage Strategy. - Mitigation measures will seek to preserve in situ any cultural heritage constraints, and where this is not possible, a hierarchical range of mitigation measures will be implemented in advance of and during construction. - All archaeological investigations, including test excavations, preservation by record (excavation) and archaeological monitoring, will be undertaken by a suitably qualified archaeologist in accordance with a Section 26 (2) Excavation Licence. - Preliminary report and a final report on the findings to fulfil licence conditions. Details of the reporting requirements will be contained within the Luas Finglas Cultural Heritage Strategy. - Specific mitigation for certain features including written and photographic record, bridge protection measures, monitoring of	- No moderate or significant residual adverse impacts.

	CHC007, CHC009, CHC043, CHC045, CHC046 and CHC052 (site of buildings); and CHC044 (site of well).	vibration, detail method statements, pre-works condition surveys, measures for works within environs of the canal, reinstatement and sensitive design, protection by hoardings and signage, archaeological test excavations, invasive species measures, boundary treatments, etc.	
Landscape & Visual Amenity	*Common construction activities:* - Removal of existing soft landscape features. - Removal of existing hard landscape features. - Installation of temporary fencing and hoarding. - Installation of traffic management infrastructure. - Construction of temporary footpaths. - Diversion of overhead and underground services and utilities. - Construction works associated with the proposed engineering works for the track, OCS and poles, bridges, stations and associated car parking and maintenance building. - Construction works associated with proposed pedestrian footpaths, cycle, road bridges and vehicular access routes. - Construction work associated with replacement of soft landscape treatment and regrading works within public open space or private gardens. - Construction work associated with replacement hard landscape features	*Standard construction mitigation measures:* - Location of construction compounds in areas with minimal vegetation clearances and low-quality landscape/ visual sensitivity. - Site compounds in proximity to residential properties will implement appropriate site management procedures to control construction vehicular access, control of site / compound lighting to divert away from residential properties and maintain effective dust and dirt control measures. - Storage of construction materials will be organised to avoid obstruct visibility from residential properties. - All trees and vegetation within and adjoining the works area will be protected in accordance with the British Standard Institution (BSI) British Standard (BS) 5837:2012 'Trees in relation to in relation to design, demolition, and construction - Recommendations' (BSI 2012). - Works required within the root protection area (RPA) of trees to be retained will follow a project-specific arboricultural methodology.	- Following the implementation of Primary Design and Secondary Mitigation Measures, including the establishment (10 years of growth to a semi-mature state for the proposed 916 trees) of mitigation measures, due to gradual acceptance of the proposed changes by receptors, the proposed Scheme will become increasingly integrated within its landscape (townscape) setting and the residual impacts will reduce over time.

	including footpaths, roads, and boundary treatment. *Site-specific Construction Activities:* - Construction of site compounds (two primary and seven temporary) - Cranes including the gantry crane over railway, mobile crane over Royal Canal and River Tolka and for P&R. - For Royal Canal Landscape Character (**LLCA 01**), works will result in minor disruption to mature hedgerow and riparian vegetation along the canal towpath, and obstruction of the west facing view of Broome Bridge arch way (CHC001.1). The Royal Canal Way used for walking, cycling and fishing will be disrupted during construction, and diverted to a temporary access route close to the canal. The total number of trees to be removed in LLCA 01 is 23. There is be a significant, temporary and negative impact on landscape character of the conservation area. - Magnitude of change during construction is high for residents on Bannow Road/ Broombridge Road and medium for people using the canal towpath. - For Broombridge Road / Industrial Estate Landscape Character (**LLCA 02**), a total of 27 trees will be removed but the sensitivity of the area is low. - Magnitude of change during construction is high but visual receptors (workers) are in sensitivity.	- Where trees must be removed for construction activities, they should be replaced in the first planting season following construction as advanced planting for the operational phase. - Where pedestrian routes are disrupted during construction, alternative routes will be provided. - Where construction activities are located in open space and parks, construction should be phased to minimise disruption to seasonal activities where possible. - Temporary construction related lighting along the alignment will be to divert away from residential properties. *Preliminary design mitigation measures:* - Minimising the removal of existing trees (341 to be removed), taking into consideration the information in the Tree Survey to maintain healthy trees where possible and protect the tree root protection zone. - Reinstatement of bankside vegetation along Royal Canal and River Tolka from bridge construction. - Use of green track bed treatment rather than a hard track design. - Provide Street trees and soft landscape areas as a planted buffer between road, cycle path and footpath, to aid traffic calming and to highlight safe crossing points.	

	- For Tolka Valley Park Landscape Character (**LLCA 03**), the sensitivity and magnitude of change during construction is high. A total of 18 trees will be removed and there will be disruption to riparian vegetation and the greenway. The setting of Finglaswood Bridge will also be altered. - Visual receptors of high sensitivity at Barnamore Grove, Barnamore Park and Carriggallen Park. Significant, temporary and negative visibility of construction activities. Moderate, temporary and negative visual impact for park users. - For St Helena's Landscape Character (**LLCA 04**), the sensitivity is low and magnitude of change during construction is medium. 12 trees will be removed. - Residents in 78 properties are high in sensitivity and there will be a moderate, temporary and negative impact on visual amenity. Linear open space users and users of social infrastructure are low in sensitivity. - For Farnham Park (**LLCA 05**), the sensitivity is medium. Spors pitch use will be disrupted, paths will be relocated and 46 tress will be removed. - High sensitivity residents of 25 properties will have visibility of construction activities and for park users (medium sensitivity), the magnitude of change is high. - For Wellmount Road (**LLCA 06**), the sensitivity and magnitude of change are medium. 24 trees to be removed and	- Provide native woodland planting to create visual screening for residential areas. - Implement a tree planting strategy to ensure long-term tree cover with a tree mix focussed on biodiversity and climate resilience. 916 trees are proposed as part of the design, (street trees, parkland trees, feathered trees, SuDS trees, and edible trees). This Strategy will also describe the function of the tree types in relation to the rail corridor i.e. avenue trees and linear planted areas to create buffers between road, cycle path and footpath, to aid traffic calming and to highlight safe crossing points. - Strengthen linkages to green spaces to create ecological corridors and provide for biodiversity enhancement, 50-80 % of plant mixes to be pollinator friendly plants. - Maintain pedestrian, bicycle, and maintenance access along Royal Canal. - Improve connectivity between local spaces by provision of new footpaths and removal of fencing. - Relocating open space areas and sports pitches as opposed to removal of open space areas. - Provide public realm enhancements and street furniture including seating areas, shelters (including bicycle storage in strategic areas) careful position and clustering of utility cabinets, signage, high quality, dynamic bridge structures and alternative-coloured finishes for OCS poles	

	magnitude of change for 70 residential properties is high. - For Finglas Main Street West (**LLCA 07**), the sensitivity and magnitude of change is medium. 25 trees to be removed. 20 residential properties will have visibility of construction activities. - For Mellowes Park (**LLCA 08**), the sensitivity and magnitude of change is medium. 90 trees to be removed and 53 residents will have visibility of the construction activities. Magnitude of change for construction phase is high. - For Finglas Road corridor (**LLCA 09 / 09A**), the sensitivity is low and magnitude of change is high. 5 trees will be removed and residents of 31 residential properties will have visibility of construction activities. - For Charlestown / St. Margaret's (**LLCA 10**), the sensitivity is low and the magnitude of change is high. 71 trees to be removed and 37 residential properties will have visibility of construction activities. Other workers and users of this area are of low sensitivity.	to mitigate their visual impact i.e. poles to be a dark colour in planted areas to visually blend in with a planted backdrop and light grey steel elsewhere. - Provide safe, lit, crossing points for Luas tracks for pedestrians and cyclists and LRT timber bollards to further delineate the green track perimeter and the LRT swept path. - Provision of ball stop fencing beside LRT line to protect LRT line passage. - SuDS based drainage proposals. - New boundary treatment along boundaries disturbed by the proposed scheme, as agreed with local residential and commercial stakeholders. - Provision of anti-trespass measures and wheel traps at park entrances to prevent anti-social wheeled access. - Minimise light emission where sensitive habitats and nocturnal species are present. - Provide lighting which avoids light pollution for surrounding residential areas. - Limit lighting within parks and open space where night-time activity is required for passenger safety. - Public open space maintenance strategies aligned with DCC Parks management objectives including monitoring of reinstatement works in public areas. *Secondary mitigation measures:*	

		- Soft landscape treatment and finishes to walls including noise barriers in specific locations. - Soft landscape treatment to create immediate visual screening. - Ecological mitigation within the landscape character areas.	
Operational Phase			
Material Assets (Infrastructure and Utilities)	- Potential impacts assessed to be minimal. - Ability to undertake future utility maintenance or diversion activities would be affected by the presence of a live LRT. - Future utility maintenance or diversion activities could affect LRT operations. - Timings for repair to any damaged utility may result in service disruptions.	- Utilities infrastructure modifications will ensure reliable provision of power (electricity / gas), water and other services across the live LRT in accordance with service level agreements which will mitigate impacts during the operational phase.	- No significant residual effects.
Material Assets (Traffic & Transport)	***Qualitative Analysis*** *Area 31 (Broombridge to Tolka Valley Road):* - For pedestrians, Level of Service (LoS) during the Do-Nothing scenario ranges between D and C. LoS will improve to an A rating at three of the impacted junctions and B rating in one of the impacted junctions in the Do Something scenario. - Proposed improvements 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. - Removal of ramp access to the north Broombridge rail platform will have a very	- Given that the proposed scheme results in a positive impact for walking, cycling, public transport and people movements, mitigation and monitoring measures are not required. - All proposed facilities designed in accordance with the principles of DMURS and the National Disability Authority (NDA) 'Building for Everyone: A Universal Design Approach' (NDA, 2020). - No additional mitigation, beyond what is already included in the design, are required to alleviate the effects of redistributed traffic.	- Imperceptible to slight adverse residual impacts within the study area. - Significant to very significant positive long-term residual transport impacts. - Significant economic impact, improving the attractiveness of the area and supporting the delivery of regeneration and development investment.

	slight negative impact on pedestrians north of the Royal Canal accessing the northern Broombridge rail platform with increases in walking distances of approximately 200m. - For cyclists, LoS rating of the cycling facilities will improve from D and B in the Do-Nothing scenario to A in the Do Something scenario. - Proposed improvements in the form of new secure bike parking; provision of 2-way cycle track; signalisation of the Broombridge Road/Ballyboggan Road junction; and provision of fully segregated cycle lanes across Tolka Valley Park. - For public transport, no major changes to bus stop locations. Positive slight and long-term effect due to Luas connectively northwards. *Area 32 (Tolka Valley Road to Finglas Village Stop)* - For pedestrians, LoS during the Do-Nothing scenario ranges between E and C and this will improve to an A at all of the impacted junctions in the Do Something scenario. - Proposed improvements to 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.		

	- For cyclists, LoS rating of the cycling facilities will improve from D in the Do-Nothing to A at two impacted areas in the Do Something scenario. - Improvements include 2m wide cycle lane on both sides of the road on Patrickswell Place and Mellows Road and upgraded cycle facilities through green space. - For public transport, one bus stop will be relocated and two new bus stops will be added. Two Luas stops are also proposed in Area 32. There will be a positive, significant and long term effect for public transport passengers. *Area 33 (North of Finglas Village Stop to Charlestown Stop)* - For pedestrians, LoS during the Do-Nothing scenario ranges between D and B, with three of the five impacted junctions along this section given the low C and D ratings and two given a B rating. LoS will improve to an A at four of the impacted junctions and B at one. - Proposed improvements 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. - For cyclists, LoS rating of the cycling facilities will improve from D in the Do Nothing to A at the R135/ R014 roundabout		

	to Charlestown Place / Melville Road / St Margaret's Road. - Proposed improvements in the form of continuous segregated cycle lanes along the route improving safety for cyclists along with greater priority at signalised junctions. - For public transport, six new bus stops will be added and two bus stops will be relocated. St Margaret's and Charlestown Luas Stops are proposed along Area 33, which will have a high impact, positive, significant and long term effect on public transport passengers. ***Quantitative Analysis*** *People Movement:* - Within the catchment area around Luas Finglas, the population is forecasted to grow by over 6,700 people (23%) by 2035, and to just over 64,000 people by 2050. - 73% of forecasted population growth in Finglas will be within a 10-minute walk of a Luas Stop. - In the opening year 2035, Luas Finglas will deliver an increase of 1.3 million low carbon public transport trips per annum, increasing to 1.8 million in 2050. - In the Do minimum scenario, an additional 400 trips represents a relatively low growth in trips to the city centre given the estimated population increase of around 10,500 persons within the same time period, reflecting the transport capacity constraints.		

	- Proportion of people travelling via sustainable modes (public transport, walk, cycle) increases from 71% in the Do Minimum to 81% with the delivery of Luas Finglas (Do Something). - Proposed scheme has been adjudged to deliver a positive, very significant and long-term impact in terms of people movement by sustainable modes. *Public Transport Performance Indicators:* - Luas Finglas will lead to an average reduction in journey times to the city centre of 15 minutes (over 30%) during the congested peak periods when compared to travel via private car. - Luas Finglas will significantly reduce public transport journey times between the Finglas area and the city centre by an average of 12% (just under 4 minutes) during the AM peak hour. - Proposed scheme is considered to deliver a positive, significant and long-term impact for public transport users. *General Traffic Network Performance Indicators:* - Luas Finglas will interact with the road network at St. Margaret's Road and the R135 North Road, along with crossings of Mellowes Road, Cappagh Road, Wellmount Road, St Helena's Road, Tolka Valley Road and Ballyboggan Road. - There will be an overall reduction in operational capacity for general traffic,		

	particularly along St Margaret's Road, and at the junction with the R135 which will be converted to a signalised junction to facilitate Luas crossings as well improved safety for pedestrians and cyclists. - Surrounding road network largely has the capacity to accommodate the redistributed general traffic as a result of the proposed scheme. - Majority of assessed junctions that required further traffic analysis have V / C ratios that are broadly similar before and after the proposed scheme implementation, resulting in a not significant and long-term effect. - Effect from the redistributed general traffic is considered acceptable in line with the scheme objectives and the considerable improvements for sustainable modes.		
Material Assets (Resource & Waste Management)	- Operational waste would be generated from stops, stabling site and other areas associated with the proposed scheme. - Amount of waste expected to be generated is negligible and the magnitude is minor. - Maintenance wastes are likely to be generated from the depot and maintenance yards and which would include hazardous wastes such as waste oils and greases, paints, chemicals. - WEEE such as Information Technology (IT) and telecommunications equipment, appliances, lighting equipment, electrically powered tools and batteries will be	- All wastes generated during this phase will be managed in accordance with the waste hierarchy. - Operator will be required to have a Sustainability Plan, linked to the ISO 14001 accreditation (or similar). Operational waste plans will be prepared to ensure the aims of the sustainability plan are met.	- No significant residual effects.

	generated during the operation of the proposed scheme. - Potential impact of waste is neutral or slight.		
Cultural Heritage	- No positive or adverse direct impacts to cultural heritage constraints will occur. - Potential for permanent, significant, indirect impacts on the setting of Broome Bridge (CHC001.1), Royal Canal (CHC003) and towpath (CHC003.1) and Finglaswood Bridge (CHC009). - Potential for permanent, moderate, indirect impacts on the setting of MGWR (CHC001), town defences (King William's ramparts) (CHC027), CA (CHC004), and CA (CHC012). - Potential for permanent, slight, positive indirect impact on the setting of St Helena House (CHC020) and Mellows memorial (CHC039).	- As above.	- Moderate adverse indirect residual impact on the setting of Broome Bridge and Finglaswood Bridge and moderate adverse residual impact on the setting of the Royal Canal and towpath. - All other residual impacts are slight or neutral and none are significant.
Landscape & Visual Amenity	- 16 photomontages prepared from key locations/ viewpoints. - **LLCA 01**: Luas bridge involves the introduction of an uncharacteristic new element or feature that contributes to an overall change of the landscape in terms of character, value and quality. Setting of Broome Bridge will also be altered. - Potential effects on landscape character will be significant, permanent and negative. - Visual impact for residents will also be significant, permanent and negative.	- As above.	- Following the implementation of Primary Design and Secondary Mitigation Measures, including the establishment (10 years of growth to a semi-mature state for the proposed 916 trees) of mitigation measures, due to gradual acceptance of the proposed changes

	- **LLCA 02**: Proposed scheme will introduce quality surfaces for footpath and cycleway on the western side of the road and new property boundary treatment. Potential effects on the landscape will be slight, permanent and positive. - Potential effects on people working and travelling along Broombridge Road will be slight, permanent and positive. - **LLCA 03**: The proposed bridge close to Ballyboggan Road, the presence of trackside infrastructure in the river valley, and the movement of the LRVs will alter the quiet riverside character of this part of the park. View of Finglaswood Bridge will be obscured and Tolka Greenway will be diverted. - Potential effects on landscape character of Tolka Valley Park will be significant, permanent and negative. - Potential effects on visual receptors is significant, permanent and negative for residents and moderate, permanent and negative for users of the park. - **LLCA 04**: Proposed scheme will introduce quality surface footpath and cycleway with low level, directional lighting on the western side of the space and new property boundary treatment. Potential effects on the landscape will be slight, permanent and positive. - Impact on visual receptors (residents and people using the linear open space) will be slight/ moderate permanent and positive.		by receptors, the proposed Scheme will become increasingly integrated within its landscape (townscape) setting and the residual impacts will reduce over time. - Residual negative impacts of moderate or greater significance on local landscape character areas (LLCA) and visual receptors will remain during the operational phase at Royal Canal, Tolka Valley Park (landscape & visual), and residential properties on Bannow Road, Barnamore Grove, Barnamore Park, Carrigallen Park, Raven's Court, Cardiff Castle Road, Casement Road, McKee Avenue, and St. Margaret's Court. - Residual positive impacts on landscape character of Broombridge Road, St,

	- **LLCA 05**: Character area will remain as a local amenity area with two sports pitches. The existing boundary tree planting will be strengthened by additional boundary trees to enhance this feature and create further enclosure within the park. There will be a loss of a portion of the open space along the eastern boundary and significance of effect will be slight, permanent on negative. - Potential effect on visual receptors will be slight, permanent and negative. - **LLCA 06**: Wellmount Road's character area will remain as linear open space, but the presence of the trackside infrastructure, the cycleway and footpath will alter the character. Effect of the proposed scheme on this landscape character area will be slight, permanent and negative. - Impact on visual residential receptors will be slight, permanent and negative, apart from Ravens Court which will be significant, permanent and negative. Workers and park users have low sensitivity. - **LLCA 07**: There will provision of an enhanced public realm in front of the civic buildings and a noticeable improvement in streetscape quality. The potential effects on the landscape will be slight, permanent and positive. - The potential effect on visual receptors will be imperceptible, permanent and positive. - **LLCA 08**: Mellowes Park will remain as a local amenity area, with the introduction of the trackside infrastructure and realigned footpath on the eastern side of the park.		Helena's, Finglas Main St. West, Finglas Road Corridor, Charlestown/ St. Margaret's, and the visual amenity of 78 no. residential properties around St. Helena's, works, open space users, 20 residential properties on Mellowes Crescent, and 69 residential properties on North Road, Margaret's Road, Melville Lawn and properties above Charlestown Shopping Centre.

	Sensitivity is medium and potential impact is slight, permanent and negative. - Impact on visual receptors will be moderate, permanent and negative for residents and slight, permanent and negative for park users. - **LLCA 09**: Proposed scheme will open up the junction to pedestrians, slow down the through traffic, create a more human scale environment and give rise to a noticeable improvement in streetscape quality. Effect of the proposed scheme on this landscape character area will be slight, permanent and positive. - Potential impact on visual receptor residents will be slight, permanent and positive. - **LLCA 10**: Proposed scheme will introduce quality surface footpath and cycleway on the eastern side of the road and new property boundary treatment, with a noticeable improvement in the streetscape. Effect of the proposed scheme on this landscape character area is slight, permanent and positive. - Impact on residential visual receptors without mitigation is moderate, permanent and positive, apart from McKee Avenue (R138), and St. Margaret's Court (R151), which will be significant, permanent on negative. People using sports pitches and workers have low sensitivity and potential effects will be imperceptible, permanent and positive.		

Do Nothing:
- Proposed scheme would not be implemented and there would be no changes to existing infrastructure or utilities as a result of the proposed scheme. - Infrastructure provision for public transport, pedestrians and cyclists would remain the same, and the streetscape would continue to be based around the movement and parking requirements of private cars, rather than people. - Traffic & transport assessment compares 'do minimum' against 'do something'. Do Minimum scenario is based on the 'likely' conditions of the transport network without the proposed scheme and includes for any known permanent improvements or changes to the road or public transport network that have taken place, been approved or are planned for implementation. Do something includes the proposed scheme. - There will be no effects as there will be no construction phase or operational phase occurring to use materials or generate waste. - There may be future impacts on the cultural heritage baseline environment through future developments within lands zoned for development within the study area. - The landscape character and visual amenity along the proposed alignment would remain low in quality for the majority of locations and the opportunities for enhancement of public realm and biodiversity will remain low.
Monitoring:
- Efficacy of mitigation measures for infrastructure and utilities will be managed and monitored through the construction contract. - Archaeological monitoring will be carried out during enabling and construction works. Should archaeological remains be confirmed, further archaeological mitigation such as preservation in situ or full archaeological excavation will be required. - Monitoring of vibration levels during construction in proximity to sensitive cultural heritage. - Monitoring of reinstatement works in public areas aligned with DCC Parks management objectives.
Cumulative Effects:
- Five other developments have potential for significant cumulative impacts on infrastructure and utilities if construction works were to take place at the same time. Further consultations will be required to prevent unintended cumulative impacts. With standard mitigation for all developments, there will be no likely significant cumulative impacts. - Developments mentioned in the cumulative impact list are included in the forecast growth predictions for traffic and transport, and as such, have been captured in the main traffic impact assessment. Ballymun-Finglas BusConnects scheme has potential cumulative traffic and transport impacts if construction works were to take place at the same time. Liaison will be required between the NTA, TII and the appointed contractors to ensure that there is coordination between projects so as to avoid significant cumulative impacts. With standard mitigation for all developments, there will be no likely significant cumulative impacts. - 18 other developments have the potential for likely significant cumulative impacts on waste management and resources if construction works were to take place at the same time. With the standard mitigations measures included for the proposed scheme, the cumulative impacts will not be significant.

- Dart + Programme West and the Royal Canal Greenway have the potential for likely significant cumulative impacts on cultural heritage during the construction phase. There are also moderate to significant cumulative impacts during the operational phase on a protected structure (Broome Bridge), with modifications and introduction of new features into its setting. - There are potential cumulative impacts with the Ballymun-Finglas BusConnects scheme at the roundabout of North Road and St Margaret's Road, if construction works were to take place at the same. As a result of the new function of the Luas, it is not possible to retain the footpaths and proposed planting designed for the BusConnects. Cumulative disruption in this area will have high levels of impact to the landscape character, visual amenity and land use for local residents during construction. Liaison will be required between the NTA, TII and the appointed contractors to ensure that pedestrian footpaths, road crossing points and new planting constructed as part of BusConnects, should be incorporated into the Luas streetscape design where possible to minimise disruption to the landscape character.

Table 14.11.1 – Consideration of Impacts, Significance and Mitigation Measures for Material Assets, Cultural Heritage and the Landscape

The Assessment: Direct and Indirect Effects

14.11.17. I have examined, analysed, and evaluated Chapters 17, 18, 19, 20 and 21 of the EIAR, all of the Appendices to these Chapters and the Construction Environmental Management Plan. I am satisfied that the applicant has provided sufficient survey data to enable assessment of likely effects on archaeology, architectural heritage and cultural heritage; traffic and transport; material assets; and landscape and visual. Further, having regard to the detailed assessment carried out, the location of the development, other developments considered for cumulative impact, and the proposed mitigation measures, which are standard good practice measures and which are proven to be effective in particular at preventing adverse effects on archaeology and disruption to traffic/ transport and utilities, I am satisfied that any significant, or cumulative effects on the environmental factors will be greatly outweighed by the benefits of the proposed scheme.

14.11.18. The location and function of major utilities was collated to assess their sensitivity and to avoid any clashes with the permanent and temporary works. Potential impacts on material assets (infrastructure and utilities) could occur from the construction of stops, tracks, substations, ancillary roadworks and paved areas; the park and ride facility; diversion of utilities; and construction compounds. Interactions with major utilities will be avoided, where possible, or protected/ diverted to avoid long term disruption to services. Any diversions/ disruptions will be planned with prior notification given to all the impacted property owners and precautions will be implemented to protect the infrastructure from damage, including localised confirmatory surveys. I would be in agreement that the residual impact on infrastructure and utilities will be slight to moderate during the construction phase and that minimal impacts will occur during the operational phase.

14.11.19. The impact of the proposed development on Material Assets – Traffic and Transport is one of the main considerations of the EIA. The main purpose of a scheme of this nature is to encourage modal shift to sustainable modes and to reduce GHG emissions. Qualitative assessments are carried out in the EIAR on pedestrian and

cycle infrastructure and on bus services. Quantitative assessments are carried out in terms of people movement, public transport performance, and on general traffic on the surrounding road network.

14.11.20. Temporary traffic arrangements, implemented through the Construction Traffic Management Plan, will be put in place for the construction phase to minimise impacts on non-motorised users and to maintain flows. I concur that with the implementation of mitigation measures during the construction phase, the impact of traffic and transport will not be significant.

14.11.21. During the operational phase of the proposed scheme, the improvements for walking, cycling, public transport and people movements will be significant. There will be a reduction in journey times for tram users and active travel will become safer and more comfortable. Reductions in traffic will have a positive impact on the environment and it has been adequately demonstrated that the surrounding road network has capacity to accommodate redistributed traffic resulting from the proposed scheme.

14.11.22. The types of waste generated by the proposed scheme and the potential for reuse of materials are identified in the EIAR, together with a review of waste management facilities. The Waste Hierarchy Model will apply throughout construction and operational phases to ensure that waste generation is minimised. Construction and demolition waste and excavated material will be primarily inert and non-hazardous; however, small quantities of hazardous wastes are predicted. The construction phase will be managed by a Construction and Demolition Resource and Waste Management Plan. I am satisfied that the construction waste and resources will be adequately managed during the construction phase and that the municipal solid wastes generated during the operational phase will not be significant.

14.11.23. Fourteen cultural heritage constraints of high importance were identified. These included town defences, a historic town, a monastic enclosure, houses, wells, bridges, and the canal. Direct impacts during construction could potentially arise from ground disturbance, demolition, removal of a constraint, ground borne vibration,

and nearby construction activities. Archaeological monitoring and inspection of excavation works will occur and the section of the bridge structures adjacent to works will be protected by hoardings and signage to prevent plant and machinery impacts. I agree that there will be no direct impact on cultural heritage constraints occuring during the operational phase and indirect impacts will be limited to visual impacts on constraints.

14.11.24. Ten Local Landscape Character Areas (LLCA) were identified along the corridor to reflect the local-scale changes in vegetation and built environment and the presence of elements of landscape sensitivity. A Tree Survey indicated that 178 individual trees and 163 small trees are required to be removed from a total of 1,037 individual trees surveyed. The main potential impacts during construction will be site mobilisation and establishment, fencing and hoarding of the construction compounds and works areas, demolition, site activity and visual disturbance, construction works, and decommissioning of works areas and compounds. Receptors of high sensitivity during construction will be the Royal Canal and Tolka Valley Park and the impact on these landscape characters and visual amenities will be moderate to significant, temporary, and negative. During the operational phase, there will be an introduction of 'uncharacteristic new element or feature that would lead to an overall change in landscape character and quality' of the Royal Canal and Tolka Valley Park LLCAs. However, I consider that having regard to the on-street improvements and proposed landscaping, the overall residual impact on landscape character and visual amenities will be positive as the proposed scheme becomes increasingly integrated within its setting.

<u>Conclusion</u>

14.11.25. Having regard to the foregoing, it is considered the main significant direct and indirect effects on material assets, cultural heritage and the landscape are as follows:

- Potential for slight to moderate adverse impacts on **Material Assets (Utilities and Infrastructure)** during the construction phase through diversion/ interruption

of services that will be mitigated through prior notification given to all the impacted property owners and precautions will be implemented to protect the infrastructure from damage, including localised confirmatory surveys.

- Potential for significant positive impacts on **Material Assets (Traffic & Transport)** during the operational phase from improvements for walking, cycling, public transport and people movements, and reductions in general traffic and associated GHG emissions.
- Potential for moderate to significant impacts on **Landscape and Visual Amenity** through the introduction of an uncharacteristic new element or feature that would lead to an overall change in landscape character and quality of the Royal Canal and Tolka Valley Park Local Landscape Character Areas. The overall residual impact on landscape character and visual amenities will be positive as the proposed scheme becomes increasingly integrated within its setting.

14.12. Risks Associated with Major Accidents and/ or Disasters

14.12.1. The risks of major accidents and/ or disasters is assessed in Chapter 22 of the EIAR. Sensitive receptors along the route of the proposed scheme are the population; cultural heritage sites; the Liffey and Dublin Bay Catchment; sensitive habitats and protected designated European sites; air quality zones; existing pedestrian infrastructure, cycle infrastructure and bus infrastructure; climate change and the likelihood of natural disaster; groundwater; and open green spaces. The proposed scheme does not fall within the consultation zone for any Seveso site.

14.12.2. There are potential medium level risks associated with the construction phase of the proposed scheme including the potential for impacts on critical infrastructure due to construction works from settlement; major road traffic accident due to increase in traffic and heavy goods vehicles; significant release event or long-term seepage of pollutants into watercourse due to working over or adjacent to watercourses (e.g. Royal Canal and River Tolka); and collapse/ damage to structures. Potential risks during the operational phase include a major road traffic accident, Luas derailment,

infectious disease, fire and/ or explosion, long-term seepage of pollutants, and heavy and prolonged rainfall entering stops and adjacent lands and watercourses.

14.12.3. The proposed scheme complies with relevant standards and has been designed to avoid risk of collapse and to cater for increased rainfall events. The Safety, Health and Welfare at Work (Construction) Regulations 2013 (S.I. No. 291/2013) (as amended) have also been considered in the design of the proposed scheme. Mitigation for the construction phase provided within the CEMP will ensure that disruption and nuisance are kept to a minimum. A Construction and Demolition Resource and Waste Management Plan, a Construction Traffic Management Plan, a Non-Native Invasive Species Management Plan, a Surface Water Management Plan, and an Environmental Incident Response Plan have been prepared for the planning application. These documents will also mitigate the risk of major accidents and/ or disasters.

14.12.4. Following implementation of all mitigation measures, the only residual risk of significant impacts is from infectious disease. However, the risk of such impacts will be managed to be as low as reasonably practicable and there will not be any likely significant environmental effects arising from the vulnerability of the proposed scheme on major accidents and disasters. Overall, I am satisfied that given the nature of the proposed development, and the mitigation measures proposed, together with the low-medium probability of a major accident/ natural disaster, it is not likely that significant effects on the environment would arise in this regard. There are no cumulative impacts that would combine to result in significant residual environmental impacts.

14.13. Cumulative impacts and Environmental Interactions

14.13.1. The cumulative impacts of the proposed scheme are considered along with any other major developments that are in pre-planning and preliminary design, or have been approved/ still to be implemented.

14.13.2. A long list of other relevant development that may overlap with the proposed scheme was identified to determine cumulative impacts. In addition, desk-based analysis was undertaken of development plan allocations up to 30th June 2024. TII also reviewed new applications and projects between July 2024 and February 2025 for cumulative impacts. It was noted in TII's response to submissions that Dart+ West has now been approved but this does not affect the assessments already conducted from an EIA or AA perspective. I have also considered any updates in terms of forward planning and development management that have taken place in 2025, e.g. the Ballyboggan Draft Masterplan.

14.13.3. The EIAR has considered a total of 402 developments of which 43 have been 'screened in' for cumulative impacts. No likely significant cumulative impacts were determined for human health, biodiversity, and land and soils due to distance, scale and nature. Broombridge, Finglas Village, and Charlestown were also assessed as hubs for cumulative impacts.

14.13.4. There is potential for cumulative impacts in terms of land take during construction and operational phases; traffic and transport during the construction phase; cultural heritage during the operational phase; and landscape and visual during the construction phase. The construction related cumulative impacts could occur if there is an overlap in construction phases with other nearby developments. Standard construction mitigation measures will also be implemented for other developments that will be sufficient to reduce any cumulative impacts. In particular, coordination and integration between other major projects, such as BusConnects and Dart+ will be required to ensure mitigation measures dealing with cumulative impacts are managed properly.

14.13.5. The proposed scheme will have significant positive cumulative impacts with other transport projects in the operational phase. This will potentially result improvements to public transport services, improvement in air quality, reduction in emissions, potential for modal shift from private vehicles to public transport, and long-term positive effects for businesses due to redevelopment of the area. Implementation

the Jamestown and Ballyboggan Masterplans will also facilitate Transport Orientated Development in the area. A notable negative residual cumulative impact on cultural heritage will occur at Broome Bridge with modifications to this structure and the introduction of new features into its setting. However, the overall cumulative impact will be profound, long term and positive for businesses through area redevelopment and increased residential accessibility facilitated by enhanced public transportation infrastructure.

14.13.6. Chapter 23 of the EIAR sets out the cross-factor interactions between environmental factors during the construction and operational stages of the proposed development. The key interactive impacts are as follows:

- Population and Human Health – potential interactive impacts from noise, emissions, vibration, changes to the landscape, and visual disturbances affecting residential areas and travel experiences. Potential impacts on surface water and groundwater resulting from the construction phase can indirectly affect communities and human health, especially those relying on domestic well supplies. Mitigation measures for other environmental factors will specifically address these effects to a level where they do not significantly impact community well-being.
- Biodiversity – Potential interactions between waste management and water environment which can have a potential impact on key ecological receptors during construction. During the operational phase, the adoption of SuDS for surface water collection and attenuation will provide environmental benefits, including the provision of refuge and foraging opportunities for a range of bird, amphibian and mammal populations. Noise and disturbance generated during the construction period has the potential for adverse interactions with people and biodiversity. Land take can also impact on biodiversity through loss of open space, biodiversity and amenity value.

- Water – Potential inactions with climate through increased rainfall intensity due to climate change. The proposed design maximises the use of green track, for landscaping, infiltration, visual amenity and reducing of urban heat intensity.
- Land and soils – Potential interaction with waste because the likelihood of excavated materials being suitable for use on-site will depend on whether it is contaminated, and the extent of contamination. Detailed ground investigations will be carried out. Excavation could also expose archaeological remains which would require mitigation.
- Material Assets (Traffic & Transport) - It is expected that there will be positive impacts on sustainable travel, which in turn will contribute positively to climate change through the reduction of carbon emissions during the operational phase.
- Landscape & Visual – Introduction of new or replacement planting will contribute to improved air quality and climate interactions among other environmental factors. Interactions are due to the introduction of uncharacteristic new elements or features, such as the tram and associated overhead lines and utilities, that will lead to changes in landscape character. There will also be interactions in this regard with cultural heritage.
- Noise & Vibration - Temporary to short term indirect interactions on Cultural Heritage features could potentially arise as the result of construction dust and noise, as well as vibration impacts from the use of heavy plant and machinery, construction traffic, directional drilling and foundation piling.
- Cultural Heritage - potential for impacts on visual setting of features caused by effects to landscape.

14.13.7. I agree that the likely significance of these combined and interrelated impacts has been assessed, and mitigated where required, within the individual assessment chapters. Overall, I would be satisfied with the methodology provided within the EIAR for interactions and cumulative assessment. Construction stage interactions will mostly be short term and any mitigation for one environmental factor can be

applicable to other environmental factors. The subject development is assessed with all the other relevant plans and projects in the wider area, and overall, this provides for a robust and complete assessment of the proposed scheme by itself and any cumulative interactions with projects and activities in the area. I am therefore satisfied that sufficient information has been acquired to fully inform the cumulative assessment of the proposed development and other relevant projects and activities.

14.14. Reasoned Conclusion

14.14.1. Having regard to the examination of environmental information contained above, and in particular to the EIAR and supplementary information provided by the developer, and the submissions from third parties and from prescribed bodies in the course of the application, it is considered that the main significant direct and indirect effects of the proposed development on the environment are as follows:

- Positive long term impacts on **population and human health** through facilitation of improved pedestrian and cyclist safety, faster and more reliable public transport services, reduced traffic congestion, improved air quality and noise reduction, improved road/ street safety, more social interaction and positive accessibility and amenity impacts for community areas.
- Adverse short-term impacts on **population and human health** from the construction phase in terms of access restrictions, noise, vibration, dust, contaminated material, traffic and visual impact. This will be adequately mitigated through compliance with the CEMP and measures outlined in the Land, Soils, Water, Air and Climate and Material Assets sections of the EIAR.
- Adverse long-term impacts on **population and human health** from the temporary and permanent acquisition of land. This will be adequately mitigated through provision of new accesses, replacement boundaries and monetary compensation.

- Neutral to slight impacts on **Biodiversity** in terms of direct habitat loss and fragmentation; physical degradation of habitats; disturbance and displacement of protected faunal species (visual and audible); pollution of surface and groundwater networks; air (dust) pollution; and spread of invasive non-native species. Mitigation will nonetheless be implemented to protect water quality through works scheduling, invasive species management, measures to mitigate against the release of suspended solids, fuels and oils, and cements, and measures to minimise disturbance to protected species.
- Beneficial cumulative impact of the proposed Luas Finglas scheme on **Climate** during the operational phase due to the overall reduction in road traffic GHG emissions.
- Adverse impacts on **Land** through acquisition of properties on a temporary basis; acquisition of properties on a permanent basis; and demolition of structures, including boundary walls / fencing. Impacts have been minimised through careful consideration of alternatives and owners will be entitled to submit a claim for compensation where land and property is necessary in order to ensure the delivery of the proposed scheme in its entirety.
- Potential impacts on **Water** during construction from runoff and watercourse disturbance. A Surface Water Management Plan and CEMP have been developed to detail the control and management measures for avoiding, preventing, or reducing any significant adverse impacts on the surface water environment.
- Potential impact on **air quality** during the construction phase is from construction dust emissions and nuisance dust deposition. Appropriate construction dust mitigation measures have been outlined for the construction phase in the CEMP.
- Potential for construction and operational **noise and vibration** impacts. Following mitigation, there will be moderate to significant impacts for brief periods when works are immediately adjacent to sensitive properties.

- Potential for slight to moderate adverse impacts on **Material Assets (Utilities and Infrastructure)** during the construction phase through diversion/ interruption of services that will be mitigated through prior notification given to all the impacted property owners and precautions will be implemented to protect the infrastructure from damage, including localised confirmatory surveys.
- Potential for significant positive impacts on **Material Assets (Traffic & Transport)** during the operational phase from improvements for walking, cycling, public transport and people movements, and reductions in general traffic and associated GHG emissions.
- Potential for moderate to significant impacts on **Landscape and Visual Amenity** through the introduction of an uncharacteristic new element or feature that would lead to an overall change in landscape character and quality of the Royal Canal and Tolka Valley Park Local Landscape Character Areas. The overall residual impact on landscape character and visual amenities will be positive as the proposed scheme becomes increasingly integrated within its setting.

15.0 Appropriate Assessment

15.1. The areas addressed in this section are as follows:

- Compliance with Articles 6(3) of the EU Habitats Directive
- Geographical Scope and Main Characteristics
- Screening the need for Appropriate Assessment
- The Natura Impact Statement and associated documents
- Appropriate Assessment of implications of the proposed development on each European site

15.2. **Compliance with Articles 6(3) of the EU Habitats Directive:** The Habitats Directive deals with the Conservation of Natural Habitats and of Wild Fauna and Flora throughout the European Union. Article 6(3) of this Directive requires that any

plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. The competent authority must be satisfied that the proposal will not adversely affect the integrity of the European site.

15.3. The proposed development comprising the development of Luas Finglas is not directly connected with or necessary to the management of any European site and is therefore subject to the provisions of Article 6(3).

15.4. **Geographical Scope and Main Characteristics**

15.4.1. Luas Finglas comprises a 3.9km extension to the Luas Green Line from the existing terminus at Broombridge to a new terminus at Charlestown. The route passes through industrial and commercial units, green urban areas, discontinuous urban areas, and industrial and commercial units according to Corrine land cover mapping.

15.4.2. As the proposed scheme travels northwards from Broombridge, it crosses the Royal Canal and then continues along Broombridge Road before crossing the River Tolka in Tolka Valley Park. The route then continues upgradient along a green strip at St. Helena's and then along the eastern side of Farnham grass pitches. More linear green spaces are utilised alongside Casement Road, Patrickswell Place and Cardiffcastle Road before the alignment passes through a new corridor created within the Finglas Garda Station car park and then onto the Mellowes Road. The route then travels along the eastern side of Mellows Park, across Finglas Road and finally along St. Margaret's Road to Charlestown.

15.4.3. Habitats recorded during the ecological habitat survey adjacent to the proposed scheme include Stone walls and other stonework (BL1), buildings and artificial surfaces (BL3), other artificial lakes and ponds (FL8), Reed and large sedge swamps (FS1), tall-herb swamps (FS2), depositing / lowland rivers (FW2), canals (FW3), amenity grassland (improved) (GA2), marsh (GM1), dry calcareous and neutral

grassland (GS1), dry meadows and grassy verges (GS2), (mixed) broadleaved woodland (WD1), scattered trees and parkland (WD5), hedgerow (WL1), wet willow-alder-ash woodland (WN6), scrub (WS1), and ornamental/non-native shrub (WS3).

15.4.4. Seven SCI bird species, namely Light-bellied Brent Goose, Black-headed Gull, Curlew; Herring Gull; Lesser Black-backed Gull; Common Gull; and Cormorant frequented the Tolka Valley Park pond and/or the maintained amenity grassland areas within and adjacent to the boundaries of the proposed scheme. A total of eight invasive non-native species were recorded during ecological surveys, two of which, (and potentially a third), namely Himalayan Balsam, Japanese Knotweed and potentially Giant Hogweed, are located in a sensitive location by the proposed Tolka Valley Park Luas bridge.

15.4.5. The proposed scheme lies within the Water Framework Directive (WFD) Liffey and Dublin Bay catchment, and within the Tolka_SC_020 sub-catchment (EPA, 2023). The River Tolka (Tolka_050), Bachelors Stream (Tolka_050) and the Royal Canal (Royal Canal Main Line - Liffey and Dublin Bay) lie within the area of the proposed scheme. Tolka Estuary and the Liffey Estuary (Lower), which both flow out into Dublin Bay, are downstream of these watercourses. The proposed scheme is located within the Dublin (IE_EA_G_008) groundwater body. A historic landfill is understood to have operated within Tolka Valley Park.

15.4.6. The main characteristic of the proposed scheme are the light rail track (including 2.8km of grass track, 700m of embedded track and 360m of structure track); a depot stabling facility to the south of the existing Broombridge terminus; four Luas stops at St Helena's, Finglas Village, St Margaret's Road and Charlestown; 3 no. power substations; and a park and ride facility with 350 spaces. Two new light rail bridges are proposed over the River Tolka and Royal Canal/ railway line. The existing pedestrian bridge over Finglas Road at Mellows Park will be demolished along with a number of non-residential buildings. A total of 10 no. new at grade signalised junctions will be created and approximately 3km of segregated cycle lanes and 100m of non-segregated cycle lanes are proposed along the route. Covered cycle storage

facilities will be provided at Broombridge, the Finglas Village and St. Margaret's stops and within the park and ride facility.

15.4.7. Three principal construction compounds will be situated to the west of Broombridge Road (2 no.) and to the north of Mellows Park. There will also be other secondary site compounds for small works/ storage. The main construction activities will be enabling works, main works activities, site finalisation works, and systems testing and commissioning. The total construction timeline for the proposed scheme is expected to be 4.5 years.

15.4.8. SuDS based drainage systems will be used, where possible. This will alleviate pressure on the existing drainage network through use of filter drains, tree pits and bioretention systems. The impact on water quality will also be reduced through the level of treatment, as well as preventing an increase in runoff rates.

15.5. Screening the Need for Appropriate Assessment

15.5.1. The first test of Article 6(3) is to establish if the proposed development could result in likely significant effects to a European site. This is considered stage 1 of the appropriate assessment process i.e., *screening.* The screening stage is intended to be a preliminary examination. If the possibility of significant effects cannot be excluded on the basis of objective information, without extensive investigation or the application of mitigation, a plan or project should be considered to have a likely significant effect and Appropriate Assessment shall be carried out.

15.5.2. Having regard to the information and submissions available, 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, the European sites set out in Table 1 below are considered relevant to include for the purposes of initial screening for the requirement for Stage 2 appropriate assessment on the basis of likely significant effects. A total of 8 European sites are included (4 SACs & 4 SPAs) for initial screening.

15.5.3. European sites considered for Stage 1 screening:

European site (SAC/SPA)	Site code	Distance to Proposed Development (km)	Connections (source, pathway, receptor)	Considered further in Screening (Y/N)
North Dublin Bay SAC	000206	7.1	Possible connections	Y
South Dublin Bay SAC	000210	6.4	Possible connections	Y
Howth Head SAC	000202	13.3	No potential connections	N
Rockabill to Dalkey Island SAC	003000	13.2	Possible connections	Y
South Dublin Bay and River Tolka Estuary SPA	004024	4.1	Possible connections	Y
North Bull Island SPA	004006	7.1	Possible connections	Y
Baldoyle Bay SPA	004016	10.6	No potential connections	N
North-West Irish Sea SPA	004236	9.6	Possible connections	Y

Table 1 – Summary Table of European sites considered in Screening for Appropriate Assessment

15.5.33. The applicant's AA Screening Report concluded that there is potential for effects on the qualifying interests of North Dublin Bay SAC, South Dublin Bay SAC, Rockabill to Dalkey Island SAC, South Dublin Bay and River Tolka Estuary SPA, North Bull Island SPA and North-West Irish Sea SPA.

15.5.34. Having reviewed the documentation and submissions on file, I am satisfied that the information allows for a complete examination and identification of any potential significant effects of the development, alone, or in combination with other plans and projects on European sites. Based on my examination of the AA Screening Report

and other supporting information, the NPWS website, aerial and satellite imagery, the scale of the proposed development and likely effects, separation distances and functional relationships between the proposed scheme and the European sites, their conservation objectives, and taken in conjunction with my assessment of the subject site and the surrounding area, I conclude that a Stage 2 Appropriate Assessment is required for the following European sites in view of the conservation objectives of these sites:

- North Dublin Bay SAC
- South Dublin Bay SAC
- Rockabill to Dalkey Island SAC
- South Dublin Bay and River Tolka Estuary SPA
- North Bull Island SPA
- North-West Irish Sea SPA.

15.5.35. Table 2 below provides a screening summary matrix where there is a possibility of significant effects from the proposed development, or where the possibility of significant effects cannot be excluded without further detailed assessment

Site name **Qualifying Interest feature**	**Is there a possibility of significant effects in view of the conservation objectives of the site?** **General impact categories presented**		
	Habitat loss/ modification	Water quality and water dependent habitats (pollution)	Disturbance/ displacement barrier effects
North Dublin Bay SAC *Qualifying Interests:* Mudflats and sandflats not covered by seawater at low tide [1140] Annual vegetation of drift lines [1210] Salicornia and other annuals colonising mud and sand [1310] Atlantic salt meadows (Glauco-Puccinellietalia maritimae) [1330] Mediterranean salt meadows (Juncetalia maritimi) [1410] Embryonic shifting dunes [2110]		Downstream habitats and species at risk of hydrological effects from proposed scheme and associated surface water drainage discharge. Risk associated with the proposed scheme to downstream European site from spread/ introduction of non-native invasive species.	

Shifting dunes along the shoreline with Ammophila arenaria (white dunes) [2120] Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130] Humid dune slacks [2190] Petalophyllum ralfsii (Petalwort) [1395]			
South Dublin Bay SAC *Qualifying Interests:* Mudflats and sandflats not covered by seawater at low tide [1140] Annual vegetation of drift lines [1210] Salicornia and other annuals colonising mud and sand [1310] Embryonic shifting dunes [2110]		Downstream habitats and species at risk of hydrological effects from proposed scheme and associated surface water drainage discharge. Risk associated with the proposed scheme to downstream European site from spread/ introduction of non-native invasive species.	
Rockabill to Dalkey Island SAC *Qualifying Interests:* Reefs [1170] Phocoena phocoena (Harbour Porpoise) [1351]		Downstream habitats and species at risk of hydrological effects from proposed scheme and associated surface water drainage discharge.	

North Bull Island SPA *Qualifying Interests:* Light-bellied Brent Goose (Branta bernicla hrota) [A046] Shelduck (Tadorna tadorna) [A048] Teal (Anas crecca) [A052] Pintail (Anas acuta) [A054] Shoveler (Anas clypeata) [A056] Oystercatcher (Haematopus ostralegus) [A130] Golden Plover (Pluvialis apricaria) [A140] Grey Plover (Pluvialis squatarola) [A141] Knot (Calidris canutus) [A143] Sanderling (Calidris alba) [A144] Dunlin (Calidris alpina) [A149] Black-tailed Godwit (Limosa limosa) [A156] Bar-tailed Godwit (Limosa lapponica) [A157]	Potential for loss of ex situ inland feeding sites used by SCI wintering bird species for the duration of the construction works.	Downstream habitats and species at risk of hydrological effects from proposed scheme and associated surface water drainage discharge. Risk associated with the proposed scheme to downstream European site from spread/ introduction of non-native invasive species.	Potential disturbance of SCI wintering bird species utilising ex situ inland feeding sites.

Curlew (Numenius arquata) [A160] Redshank (Tringa totanus) [A162] Turnstone (Arenaria interpres) [A169] Black-headed Gull (Chroicocephalus ridibundus) [A179] Wetland and Waterbirds [A999]			
South Dublin Bay and River Tolka Estuary SPA *Qualifying Interests:* Light-bellied Brent Goose (Branta bernicla hrota) [A046] Oystercatcher (Haematopus ostralegus) [A130] Ringed Plover (Charadrius hiaticula) [A137] Grey Plover (Pluvialis squatarola) [A141] Knot (Calidris canutus) [A143] Sanderling (Calidris alba) [A144] Dunlin (Calidris alpina) [A149]	Potential for loss of ex situ inland feeding sites used by SCI wintering bird species for the duration of the construction works.	Downstream habitats and species at risk of hydrological effects from proposed scheme and associated surface water drainage discharge. Risk associated with the proposed scheme to downstream European site from spread/ introduction of non-native invasive species.	Potential disturbance of SCI wintering bird species utilising ex situ inland feeding sites.

Bar-tailed Godwit (Limosa lapponica) [A157] Redshank (Tringa totanus) [A162] Black-headed Gull (Chroicocephalus ridibundus) [A179] Roseate Tern (Sterna dougallii) [A192] Common Tern (Sterna hirundo) [A193] Arctic Tern (Sterna paradisaea) [A194] Wetland and Waterbirds [A999]			
North-West Irish Sea cSPA Common Scoter (Melanitta nigra) [A065] Red-throated Diver (Gavia stellata) [A001] Great Northern Diver (Gavia immer) [A003] Fulmar (Fulmarus glacialis) [A009] Manx Shearwater (Puffinus puffinus) [A013] Shag (Phalacrocorax aristotelis) [A018]	Potential for loss of ex situ inland feeding sites used by SCI wintering bird species for the duration of the construction works.	Downstream habitats and species at risk of hydrological effects from proposed scheme and associated surface water drainage discharge.	Potential disturbance of SCI wintering bird species utilising ex situ inland feeding sites.

Cormorant (Phalacrocorax carbo) [A017] Little Gull (Larus minutus) [A177] Kittiwake (Rissa tridactyla) [A188] Black-headed Gull (Chroicocephalus ridibundus) [A179] Common Gull (Larus canus) [A182] Lesser Black-backed Gull (Larus fuscus) [A183] Herring Gull (Larus argentatus) [A184] Great Black-backed Gull (Larus marinus) [A187] Little Tern (Sterna albifrons) [A195] Roseate Tern (Sterna dougallii) [A192] Common Tern (Sterna hirundo) [A193] Arctic Tern (Sterna paradisaea) [A194] Puffin (Fratercula arctica) [A204] Razorbill (Alca torda) [A200] Guillemot (Uria aalge) [A199]			

Table 2 Screening summary matrix: European sites for which there is a possibility of significant effects (or where the possibility of significant effects cannot be excluded without further detailed assessment)

15.5.36. The remaining sites can be screened out from further assessment because of the scale of the proposed works, the nature of the Conservation Objectives, Qualifying and Special Conservation Interests, the separation distances and the lack of a substantive ecological linkage, hydrologically or otherwise, between the proposed works and the European sites. Howth Head SAC QIs are located above the coastal waters, there is no hydrological connection from the proposed scheme to the SAC. Baldoyle Bay SPA is located beyond the reasonable surface water impact pathway and as such, no likely significant effects are predicted. Furthermore, the SCI bird species of Baldoyle Bay SPA do not frequently land within the disturbance buffer of the proposed scheme.

15.5.37. The proposed Luas Finglas scheme does not overlap with any European site and there is no potential to cause direct habitat loss, fragmentation or disturbance in any of the Special Areas of Conservation screened out within the study area due to the location of the works outside of any such European sites. Indirect terrestrial or aquatic habitat loss or degradation will not occur in all sites screened out due to the absence of hydrological connectivity and/ or the separation distance between construction works, or any operational stage work. It is not considered likely that invasive species could spread to European sites which are located a significant distance from the outfall locations and separated by a large marine waterbody.

15.5.38. The proposed scheme has the potential to result in habitat degradation of the qualifying /special conservation interest species of European sites as the result of hydrogeological impacts. However, there is substantial distance to sites located outside of Dublin Bay, which is hydrologically connected to the proposed scheme site. There is potential for hydrological impacts on European sites within Dublin Bay leading to degradation of sensitive habitat, which in turn would negatively affect the SCI bird species that rely upon these habitats as foraging and / or roosting habitat. It could also negatively affect the quantity and quality of prey available to SCI bird species. These European sites have therefore been screened in.

15.5.39. It is therefore reasonable to conclude that on the basis of the information on the file, which I consider adequate in order to issue a screening determination, that the proposed development, individually or in combination with other plans or projects would not be likely to have a significant effect on Baldoyle Bay SPA (004016) and Howth Head SAC (000202) in view of the sites' conservation objectives and a Stage 2 Appropriate Assessment for these sites is not therefore required. I am therefore satisfied that no additional sites other than those assessed in the NIS need to be brought forward for Appropriate Assessment.

15.5.40. Having carried out Screening for Appropriate Assessment of the project, it has been concluded that the project individually, or in combination with other plans or projects, could have a significant effect on European site No's. 000206, 000210, 003000, 004024, 004006 and 004236 in view of the sites' Conservation Objectives, and Appropriate Assessment is therefore required.

15.6. The Natura Impact Statement and Associated Documents

15.6.1. The application was accompanied by an Appropriate Assessment Screening Report and Natura Impact Statement dated 2024 and submitted to the Board on November 2024. The NIS examines the effects of the proposed Luas Finglas scheme alone, and in-combination with other projects and activities, on the integrity of European sites in respect of their conservation objectives and their structure and function. The NIS Appendices include (A) Site Layout Plan, (B) Habitat Maps, (C) Wintering Bird Survey Data Summary, (D) Desktop Study Wintering Bird Data Summary, (E) Construction Environmental Management Plan, (F) Surface Water Management Plan, (H) Construction & Demolition Resource And Waste Management Plan, and (I) Invasive Species Management Plan.

15.6.2. In general, I am satisfied that the Appropriate Assessment Screening Report and Natura Impact Statement submitted with the planning application adequately describes the proposed scheme, the project site and the surrounding area. The Stage 1 Screening Assessment concluded that a Stage 2 Appropriate Assessment

(NIS) was required. The Appropriate Assessment Screening Report and NIS outlined the methodology used for assessing potential impacts on the habitats and species within the European sites that have the potential to be affected by the proposed development. It predicted the potential impacts for the site and its conservation objectives, suggested mitigation measures, assessed in-combination effects and identified any residual effects on the European site and its conservation objectives.

15.6.3. The Appropriate Assessment Screening Report and NIS were informed by the following studies, surveys and consultations:

- Desk Study:
  - EC (2013) Interpretation Manual of European Union Habitats. Version EUR 28. European Commission;
  - NPWS, 2019a. The Status of EU Protected Habitats and Species in Ireland. Volume 1: Summary Overview. Unpublished NPWS report. Edited by: Deirdre Lynn and Fionnuala O'Neill;
  - NPWS, 2019b. The Status of EU Protected Habitats and Species in Ireland. Volume 2: Habitats Assessments. Unpublished NPWS report. Edited by: Deirdre Lynn and Fionnuala O'Neill;
  - NPWS, 2019c. The Status of EU Protected Habitats and Species in Ireland. Volume 3: Species Assessments. Unpublished NPWS report. Edited by: Deirdre Lynn and Fionnuala O'Neill;
  - Aerial photography available from www.osi.ie and ESRI World Imagery;
  - NPWS website (www.npws.ie): Natura 2000 site synopses, data forms and conservation objectives, along with Annex I habitat distribution data and status reports;
  - River Basin Management Plans (www.wfdireland.ie);
  - NBDC Biodiversity Maps (maps.biodiversityireland.ie);

- Catchments (www.catchments.ie);
- Environmental Protection Agency Maps (https://gis.epa.ie/EPAMaps);
- Geological Survey Ireland (GSI) website (www.gsi.ie);
- GSI - Groundwater data viewer (https://dcenr.maps.arcgis.com); and
- Planning Applications (myplan.ie).

- Consultations:
  - National Parks and Wildlife Service (6th June 2023 & 17th April 2024)
  - Inland Fisheries Ireland (3rd November 2020)
  - Dublin City Council (DCC)
  - Fingal County Council (FCC)
  - Iarnród Éireann
  - Inland Fisheries Ireland
  - Waterways Ireland
- Baseline surveys:
  - Initial ecological walkover survey carried out on 26th May 2021 by the Luas Team Ecologists.
  - Updated habitat and invasive species surveys conducted on 20th June 2023.
  - SCI-species focused wintering bird surveys (eight per season) conducted during the optimum survey months (December, January and February) for the 2021- 2022, 2022-2023 and 2023-2024 winter periods.
  - Aquatic botanical surveys conducted along the Royal Canal on 5th May 2022 and 6th June 2022.
  - Aerial photographs and site maps assisted the survey. Habitats have been named and described following Fossitt (2000). Nomenclature for higher

plants follows that given in The New Flora of the British Isles 4th Edition (Stace, 2019). Identification of Irish plants generally follow Webb's An Irish Flora (Parnell and Curtis, 2012).

15.6.4. The NIS concluded that, following an examination, analysis and evaluation of the relevant information, including in particular the nature of the predicted impacts from Luas Finglas and the effective implementation of the mitigation measures proposed, that Luas Finglas will not adversely affect (either directly or indirectly) the integrity of any European site in view of the site's conservation objectives, either alone or in combination with other plans or projects, and there is no reasonable scientific doubt in relation to this conclusion.

15.6.5. Having reviewed the NIS and the supporting documentation, I am satisfied that it provides adequate information in respect of the baseline conditions, clearly identifies the potential impacts, and uses best scientific information and knowledge. Details of mitigation measures are provided, and they are summarised in the NIS. I am satisfied that the information allows for a complete assessment of any adverse effects of the development, on the conservation objectives of the following European sites alone, or in combination with other plans and projects:

- North Dublin Bay SAC,
- South Dublin Bay SAC,
- Rockabill to Dalkey Island SAC,
- North Bull Island SPA,
- South Dublin Bay and River Tolka Estuary SPA,
- North-west Irish Sea SPA

15.7. Appropriate Assessment of implications of the proposed development on each European site

15.7.1. The following is an assessment of the implications of the project on the relevant conservation objectives of the European sites using the best available scientific knowledge in the field. All aspects of the project which could result in significant effects are identified and mitigation measures designed to avoid or reduce any adverse effects are examined and assessed.

15.7.2. I have relied on the following guidance:

- DoEHLG (2009, 2010 revision). 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.
- EC (2021) Assessment of plans and projects significantly affecting Natura 2000 sites. Methodological guidance on the provisions of Article 6(3) and 6(4) of the Habitats Directive 92/43/EC
- EC (2018) Managing Natura 2000 sites. The provisions of Article 6 of the Habitats Directive 92/43/EEC
- EC (2011) Guidelines on the implementation of the Birds and Habitats Directives in Estuaries and coastal zones.
- EC (2022) Guidance document on assessment of plans and projects in relation to Natura 2000 sites - A summary (European Commission. Directorate General for Environment).

15.7.3. **Relevant European sites:** The following sites are subject to appropriate assessment.

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

- North Bull Island SPA,
- South Dublin Bay and River Tolka Estuary SPA,
- North-West Irish Sea cSPA

15.7.4. A description of these site and their Conservation Objectives and Qualifying Interests, including any relevant attributes and targets for the site, is set out in the NIS and outlined in the tables below. I have also examined the Natura 2000 data forms as relevant and the Conservation Objectives supporting documents for these sites available through the NPWS website (www.npws.ie).

15.7.5. **Aspects of the proposed development:** The main aspects of the proposed development that could adversely affect the conservation objectives of European sites include:

- Indirect habitat loss and fragmentation as a consequence of habitat damage degradation from a reduction in water quality and/ or change to hydrological regime.
- Reduction in water quality resulting in degradation of sensitive habitat present within European sites, which in turn could negatively affect SCI bird species relying on these habitats for foraging/ roosting.
- Habitat degradation as a result of introduction/ spreading of non-native invasive species to downstream European sites.
- Habitat degradation as a result of air quality impacts.
- Disturbance and displacement impacts on SCI bird species known to forage and/ or roost at inland sites, such as playing pitches.

15.7.6. **Tables 3 to 8** summarise the appropriate assessment and site integrity test. The conservation objectives, targets and attributes as relevant to the identified potential significant effects are examined and assessed in relation to the aspects of the proposal (alone and in combination with other plans and projects). Mitigation

measures are examined, and clear, precise and definitive conclusions reached in terms of adverse effects on the integrity of European sites.

15.7.7. Supplemental to the summary tables, key issues that arose through consultation and through my examination and assessment of the NIS and further information request are expanded upon in the text below.

15.8. Table 3 – South Dublin Bay SAC

Table 3

South Dublin Bay SAC (Site code: 000210)

Key Issues:

- Habitat degradation as a result of hydrological impacts
- Habitat degradation as a result of introducing / spreading non-native invasive species.

Conservation Objectives: https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000210.pdf

		Summary of Appropriate Assessment			
Conservation Objective	Targets & Attributes (as relevant)	Potential adverse effects	Mitigation Measures	In-combination effects of Plans & Programmes/ Major Projects	Can adverse effects on site integrity be excluded?
To maintain the favourable conservation condition of the following:	**The favourable conservation status of a species is achieved when:**	**Construction Stage Effects:** - Temporary/ permanent reduction in habitat as a result of deleterious substances entering the habitat via	**Construction Stage Mitigation:** - CEMP will be updated and finalised prior to construction commencing. Contractors will comply with all the mitigation	No in combination effect: - Plans subject to AA prior to adoption and contain policies and objectives to ensure protection of European sites.	Yes - Due to mitigation measures, best practice measures and implementation of monitoring, no adverse effects on water quality or the
Mudflats and sandflats not covered by seawater at low tide [1140]	Stable or increasing habitat area; maintenance of extent/ conservation of high quality of				

	Zostera-dominated community and conserve its high quality; and conserve the community type in a natural condition of fine sands with *Angulus tenuis* community complex.	surface water and groundwater-to-surface water pathways. - The natural (River Tolka) and artificial (Royal Canal) watercourses have the potential to transport these pollutants downstream, resulting in hydrocarbon pollution. - Habitat degradation as a result of introducing / spreading non-native invasive species. There is Japanese Knotweed, Himalayan Balsam and Giant Hogweed in close proximity to the proposed scheme and these species could temporarily or permanently impact the floral species composition within Annex habitat. Construction activities may result in the	measures set out in this NIS and included in the CEMP. There will be oversight of specified measures by an ecologist. - Adherence to standard environmental best practice. - Surface Water Management Plan including measures for management of silt-laden water on-site; fail-safe site drainage and bunding; prevention of accidental discharge into the surface water network; handling of concrete, stockpiling, excavation of contaminated soils; and silt fencing. - Measures for construction compound layout, site establishment, security, fuel storage, welfare and sanitary facilities, construction phase haul road mitigations, and control of sediment. - Measures for fuel and chemical spillages.	- Proposed major projects and proposed development along the route, will be subject to planning consent, including AA screening and NIS as required, and it will be necessary to determine that the projects will not result in adverse effects on European sites. - Prescribed mitigations will safeguard local vector pathways to European Sites, and moreover, there are mitigation measures outlining the requirement to liaise with other overlapping large-scale project teams. - Proposed scheme alone will not adversely affect the integrity of any European sites, and therefore will not act in combination any other major project to have	designated conservation interests of the European sites will occur.
To restore the favourable conservation condition of the following:					
Annual vegetation of drift lines [1210]	Increasing habitat area; no decline in habitat distribution; maintain appropriate physical structure (functionality and sediment supply/ presence/ absence of physical barriers/ maintain natural circulation or sediment and organic matter); maintain range of coastal habitat; maintain presence of species-poor communities with typical species; and appropriate levels of negative indicator species.				
Salicornia and other annuals colonising mud and sand [1310]	No decline in habitat distribution; stable/ increasing habitat area; maintain/ restore natural circulation of sediments/ organic matter; maintain creek and pan structure and natural tidal				

	regime; maintain range of coastal habitat and structural variation within sward; maintain >90% of areas outside creeks vegetated; maintain presence of listed species poor communities; and no significant expansion of common cordgrass.	dispersal of invasive species, which have the potential to become established in Annex habitat. **Operational Stage Effects:** - Due to SuDS measures, surface waterbodies, which hydrologically connect the proposed scheme with the designated sites, will not experience any operational contamination from surface water run-off of hardstanding surfaces.	- Surface water monitoring to include visual inspection of surface water control measures; daily visual inspections of the Royal Canal and the River Tolka; and surface water quality sampling. - Measures for investigating any environmental incidents. - Implementation of Dust Management Plan, which will include monitoring of dust deposition, dust flux, real-time PM10 continuous monitoring and visual inspections. - Development of stakeholder communications plan. - Site management including record of complaints, exceptional incidents and liaison with other construction sites. - Undertake daily on-site and off-site inspection, where receptors (including roads) are nearby, to monitor dust.	an adverse effect on the integrity of any European sites.	
Embryonic shifting dunes [2110]	Stable/ increasing habitat area; no decline in habitat distribution; maintain appropriate physical structure (functionality and sediment supply); maintain range of coastal habitat; maintain healthy sand couch grass and/ or lyme-grass; maintain presence of species-poor communities with typical species; and appropriate levels of negative indicator species.				

			- Preparing and maintaining the site having regard to dust causing activities. - Operating machinery and sustainable travel measures (idling, generator use, speed limits, and construction logistics). - Dust suppression measures for operations and waste management. - Dust suppression measures specific to demolition, earthworks, construction and track-out. - Construction stage Aspergillus and asbestos mitigation. - Implementation of Invasive Species Management Plan to include pre-construction survey; final Invasive Species Management Plan; general measures to avoid the spread of INNS; biosecurity mitigations; soil excavation measures; disposal of material;		

			measures to be implemented during application of herbicides; post construction monitoring; assessment of management options for Third Schedule Non-native Invasive Species; and selected management controls. - Specific measures for Japanese Knotweed, Giant Hogweed and Himalayan Balsam. - Area Specific Mitigation for run off control at the Royal Canal; biosecurity and surface water control measures at Tolka Valley Park Bridge; and installation of silt fences and geotextile sandbag barriers to safeguard the Tolka Valley Park ICWs and pond. **Operational Phase Mitigation:** - SuDS features will collectively provide surface water run-off		

			attenuation, infiltration, and in-situ retention of sediments (and associated nutrients), metals, and hydrocarbons, and therefore terrestrial habitats within and directly adjacent to the proposed scheme will not experience any operational contamination. - One of SuDS features connected to the ICW within the Tolka Valley Park will be pre-emptively constructed before the construction works in order to sustain the performance and protection of the Tolka Valley Park ICWs.		

Overall Conclusion: Integrity test

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.

Based on the information provided, I am satisfied that adverse effects can be excluded for South Dublin Bay SAC. Adverse effects from deleterious substances entering habitat via surface water and groundwater-to-surface water pathways can be effectively prevented by mitigation measures ensuring protection of the natural (River Tolka) and artificial (Royal Canal) watercourses, both of which drain to Dublin Bay. During the operational phase, SuDS measures will mitigate against the potential for contamination from surface water run-off of hardstanding surfaces.

The spread of invasive species can also be controlled via mitigation measures, including pre-construction surveys, implementation of management plan and monitoring in subsequent years following treatment will be carried out in accordance with the Invasive Species Management Plan appended to the NIS.

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 South Dublin Bay SAC.

15.9. Table 4 – North Dublin Bay SAC

Table 4

North Dublin Bay SAC (Site code: 000206)

Key Issues:

• Habitat degradation as a result of hydrological impacts • Habitat degradation as a result of introducing / spreading non-native invasive species. **Conservation Objectives:** https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000206.pdf					
		Summary of Appropriate Assessment			
Conservation Objective	Targets & Attributes (as relevant)	Potential adverse effects	Mitigation Measures	In-combination effects of Plans & Programmes/ Major Projects	Can adverse effects on site integrity be excluded?
To maintain the favourable conservation condition of the following: Mudflats and sandflats not covered by seawater at low tide [1140]	**The favourable conservation status of a species is achieved when:** Stable or increasing habitat area; maintenance of extent/ conservation of high quality of *Mytilus edulis*-dominated community and conserve its high quality; and conserve the community type in a natural condition of fine sand to sandy mud with *Pygospio elegans,*	**Construction Phase:** - Temporary/ permanent reduction in habitat as a result of deleterious substances entering the habitat via surface water and groundwater-to-surface water pathways. - The natural (River Tolka) and artificial	**Construction Stage Mitigation:** - CEMP will be updated and finalised prior to construction commencing. Contractors will comply with all the mitigation measures set out in this NIS and included in the CEMP. There will be oversight of specified measures by an ecologist.	No in combination effect: - Plans subject to AA prior to adoption and contain policies and objectives to ensure protection of European sites. - Proposed major projects and proposed development along the route, will be subject to planning consent, including AA screening	Yes - Due to mitigation measures, best practice measures and implementation of monitoring, no adverse effects on water quality or the designated conservation interests of the European sites will occur.

	Crangon crangon and *Spio martinensis* community complex.	(Royal Canal) watercourses have the potential to transport these pollutants downstream, resulting in hydrocarbon pollution. - Habitat degradation as a result of introducing / spreading non-native invasive species. There is Japanese Knotweed, Himalayan Balsam and Giant Hogweed in close proximity to the proposed scheme and these species could temporarily or permanently impact the floral species composition within Annex habitat. Construction activities may result in the dispersal of invasive species, which have the potential to become established in Annex habitat.	- Adherence to standard environmental best practice. - Surface Water Management Plan including measures for management of silt-laden water on-site; fail-safe site drainage and bunding; prevention of accidental discharge into the surface water network; handling of concrete, stockpiling, excavation of contaminated soils; and silt fencing. - Measures for construction compound layout, site establishment, security, fuel storage, welfare and sanitary facilities, construction phase haul road mitigations, and control of sediment. - Measures for fuel and chemical spillages. - Surface water monitoring to include visual inspection of surface water control	and NIS as required, and it will be necessary to determine that the projects will not result in adverse effects on European sites. - Prescribed mitigations will safeguard local vector pathways to European Sites, and moreover, there are mitigation measures outlining the requirement to liaise with other overlapping large-scale project teams. - Proposed scheme alone will not adversely affect the integrity of any European sites, and therefore will not act in combination any other major project to have an adverse effect on the integrity of any European sites.	
Atlantic Salt Meadows (Glauco-Puccinellietalia maritimae) [1330]	No decline in habitat distribution; stable/ increasing habitat area; maintain/ restore natural circulation of sediments/ organic matter; maintain creek and pan structure and natural tidal regime; maintain range of coastal habitat and structural variation within sward; maintain >90% of areas outside creeks vegetated; maintain range of sub-communities with typical species; and no significant expansion of common cordgrass.				
Mediterranean salt meadows (Juncetalia maritime) [1410]	Stable/ increasing habitat area; no decline in habitat distribution; maintain appropriate physical structure (sediment supply); maintain creek and pan structure; maintain natural tidal regime; maintain range of coastal habitat; maintain structural variation in sward; maintain more than 90% of the area outside of creeks vegetated; maintain range of sub-communities with typical				

	species; and no expansion of common cordgrass.	**Operational Stage Effects:** - Due to SuDS measures, surface waterbodies, which hydrologically connect the proposed scheme with the designated sites, will not experience any operational contamination from surface water run-off of hardstanding surfaces.	measures; daily visual inspections of the Royal Canal and the River Tolka; and surface water quality sampling. - Measures for investigating any environmental incidents. - Implementation of Dust Management Plan, which will include monitoring of dust deposition, dust flux, real-time PM10 continuous monitoring and visual inspections. - Development of stakeholder communications plan. - Site management including record of complaints, exceptional incidents and liaison with other construction sites. - Undertake daily on-site and off-site inspection, where receptors (including roads) are nearby, to monitor dust. - Preparing and maintaining the site having regard to dust causing activities.		
Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]	Stable/ increasing habitat area; no decline in habitat distribution; maintain appropriate physical structure (functionality and sediment supply); maintain range of coastal habitat; appropriate bare ground; maintain range of sub-communities with typical species; maintain structural variation in sward; appropriate levels of negative indicator species; and appropriate levels of scrub/ trees.				
Petalwort *Petalophyllum ralfsii [1395]*	No decline in population distribution, spread and size; no decline in suitable habitat; maintain hydrological conditions; and maintain low vegetation structure with high percentage of bryophytes and bare ground.				
To restore the favourable conservation condition of the following:					
Annual vegetation of drift lines [1210]	Increasing habitat area subject to natural processes; no decline				

	in habitat distribution; maintain appropriate physical structure (functionality and sediment supply); maintain range of coastal habitat; maintain presence of species-poor communities with typical species; and appropriate levels of negative indicator species.		- Operating machinery and sustainable travel measures (idling, generator use, speed limits, and construction logistics). - Dust suppression measures for operations and waste management. - Dust suppression measures specific to demolition, earthworks, construction and track-out. - Construction stage Aspergillus and asbestos mitigation. - Implementation of Invasive Species Management Plan to include pre-construction survey; final Invasive Species Management Plan; general measures to avoid the spread of INNS; biosecurity mitigations; soil excavation measures; disposal of material; measures to be implemented during application of herbicides; post construction		
Salicornia and other annuals colonising mud and sand [1310]	No decline in habitat distribution; stable/ increasing habitat area; maintain/ restore natural circulation of sediments/ organic matter; maintain creek and pan structure and natural tidal regime; maintain range of coastal habitat and structural variation within sward; maintain >90% of areas outside creeks vegetated; maintain presence of listed species poor communities; and no significant expansion of common cordgrass.				
Embryonic shifting dunes [2110]	Stable/ increasing habitat area; no decline in habitat distribution; maintain appropriate physical structure (functionality and sediment supply); maintain range of coastal habitat; maintain healthy sand couch grass and/ or lyme-grass;				

	maintain presence of species-poor communities with typical species; and appropriate levels of negative indicator species.		monitoring; assessment of management options for Third Schedule Non-native Invasive Species; and selected management controls. - Specific measures for Japanese Knotweed, Giant Hogweed and Himalayan Balsam. - Area Specific Mitigation for run off control at the Royal Canal; biosecurity and surface water control measures at Tolka Valley Park Bridge; and installation of silt fences and geotextile sandbag barriers to safeguard the Tolka Valley Park ICWs and pond. **Operational Phase Mitigation:** - SuDS features will collectively provide surface water run-off attenuation, infiltration, and in-situ retention of		
Shifting dunes along the shoreline with Ammophila arenaria (white dunes) [2120]	Stable/ increasing habitat area; no decline in habitat distribution; maintain appropriate physical structure (functionality and sediment supply); maintain range of coastal habitat; maintain healthy marram grass and/ or lyme-grass; maintain presence of species-poor communities dominated by marram grass; and appropriate levels of negative indicator species.				
Fixed Coastal Dunes with herbaceous vegetation (grey dunes) [2130]	No decline in habitat distribution; stable/ increasing habitat area; maintain/ restore natural circulation of sediments/ organic matter; maintain range of coastal habitat; bare ground should not exceed 10% of fixed dune habitat; maintain structural variation within sward; maintain range of sub-communities with typical species; negative indicator species to represent less than 5% cover; and no				

	more than 5% shrub/ tree cover or under control.		sediments (and associated nutrients), metals, and hydrocarbons, and therefore terrestrial habitats within and directly adjacent to the proposed Scheme will not experience any operational contamination. - One of SuDS features connected to the ICW within the Tolka Valley Park will be pre-emptively constructed before the construction works in order to sustain the performance and protection of the Tolka Valley Park ICWs.		
Humid dune slacks [2190]	Increasing habitat area; no decline in habitat distribution; maintain appropriate physical structure (functionality and sediment supply); maintain hydrological regime; maintain range of coastal habitat; appropriate bare ground; maintain range of sub-communities with typical species; maintain structural variation in sward; appropriate levels of creeping willow and negative indicator species; and appropriate levels of scrub/ trees.				

Overall Conclusion: Integrity test

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.

Based on the information provided, I am satisfied that adverse effects can be excluded for North Dublin Bay SAC. Adverse effects from deleterious substances entering habitat via surface water and groundwater-to-surface water pathways can be effectively prevented by mitigation measures ensuring protection of the natural (River Tolka) and artificial (Royal Canal) watercourses, both of which drain to Dublin Bay. During the operational phase, SuDS measures will mitigate against the potential for contamination from surface water run-off of hardstanding surfaces.

The spread of invasive species can also be controlled via mitigation measures, including pre-construction surveys, implementation of management plan and monitoring in subsequent years following treatment will be carried out in accordance with the Invasive Species Management Plan appended to the NIS.
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 North Dublin Bay SAC.

15.10. Table 5 – Rockabill to Dalkey Islands SAC

Table 5

Rockabill to Dalkey Island SAC (Site code: 003000)

Key Issues:

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

Conservation Objectives: https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO003000.pdf

		Summary of Appropriate Assessment			
Conservation Objective	Targets & Attributes (as relevant)	Potential adverse effects	Mitigation Measures	In-combination effects of Plans &	Can adverse effects on site

				Programmes/ Major Projects	integrity be excluded?
To maintain the favourable conservation condition of the following:	**The favourable conservation status of a species is achieved when:**	**Construction Phase:** - Temporary/ permanent reduction in habitat as a result of deleterious substances entering the habitat via surface water and groundwater-to-surface water pathways during construction. - The natural (River Tolka) and artificial (Royal Canal) watercourses have the potential to transport these pollutants downstream, resulting in hydrocarbon pollution during construction. - Loss of foraging resources as result of pollution events or the consumption of food items containing	**Construction Stage Mitigation:** - CEMP will be updated and finalised prior to construction commencing. Contractors will comply with all the mitigation measures set out in this NIS and included in the CEMP. There will be oversight of specified measures by an ecologist. - Adherence to standard environmental best practice. - Surface Water Management Plan including measures for management of silt-laden water on-site; fail-safe site drainage and bunding; prevention of accidental discharge into the surface water network; handling of concrete, stockpiling, excavation of	No in combination effect: - Plans subject to AA prior to adoption and contain policies and objectives to ensure protection of European sites. - Proposed major projects and proposed developments along the route, will be subject to planning consent, including AA screening and NIS as required, and it will be necessary to determine that the projects will not result in adverse effects on European sites. - Prescribed mitigations will safeguard local vector pathways to European Sites, and moreover, there are mitigation measures outlining the	Yes - Due to mitigation measures, best practice measures and implementation of monitoring, no adverse effects on water quality or the designated conservation interests of the European sites will occur.
Reefs [1170]	Stable or increasing habitat area and habitat distribution; and conserve intertidal reef community complex and subtidal reef community complex in natural condition.				
Harbour porpoise *Phocoena phocoena* [1351]	No restriction of species range by artificial barriers to site use; and human activities should occur at levels that do not adversely affect the species at the site.				

		polluting elements may impact the health of the Harbour Porpoise population that inhabits Dublin Bay, including the River Tolka Estuary. **Operational Stage Effects:** - Due to SuDS measures, surface waterbodies, which hydrologically connect the proposed scheme with the designated sites, will not experience any operational contamination from surface water run-off of hardstanding surfaces.	contaminated soils; and silt fencing. - Measures for construction compound layout, site establishment, security, fuel storage, welfare and sanitary facilities, construction phase haul road mitigations, and control of sediment. - Measures for fuel and chemical spillages. - Surface water monitoring to include visual inspection of surface water control measures; daily visual inspections of the Royal Canal and the River Tolka; and surface water quality sampling. - Measures for investigating any environmental incidents. - Implementation of Dust Management Plan, which will include monitoring of dust deposition, dust flux, real-time PM10 continuous monitoring and visual inspections.	requirement to liaise with other overlapping large-scale project teams. - Proposed scheme alone will not adversely affect the integrity of any European sites, and therefore will not act in combination any other major project to have an adverse effect on the integrity of any European sites.	

			- Development of stakeholder communications plan. - Site management including record of complaints, exceptional incidents and liaison with other construction sites. - Undertake daily on-site and off-site inspection, where receptors (including roads) are nearby, to monitor dust. - Preparing and maintaining the site having regard to dust causing activities. - Operating machinery and sustainable travel measures (idling, generator use, speed limits, and construction logistics). - Dust suppression measures for operations and waste management. - Dust suppression measures specific to demolition, earthworks, construction and track-out.		

			- Construction stage Aspergillus and asbestos mitigation. - Area Specific Mitigation for run off control at the Royal Canal; biosecurity and surface water control measures at Tolka Valley Park Bridge; installation of silt fences and geotextile sandbag barriers to safeguard the Tolka Valley Park ICWs and pond; and measures to mitigate for the risk of disturbance to SCI bird species. **Operational Phase Mitigation:** - SuDS features will collectively provide surface water run-off attenuation, infiltration, and in-situ retention of sediments (and associated nutrients), metals, and hydrocarbons, and therefore terrestrial habitats within and		

			directly adjacent to the proposed Scheme will not experience any operational contamination. - One of SuDS features connected to the ICW within the Tolka Valley Park will be pre-emptively constructed before the construction works in order to sustain the performance and protection of the Tolka Valley Park ICWs.		

Overall Conclusion: Integrity test

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.

Based on the information provided, I am satisfied that adverse effects can be excluded for Rockabill to Dalkey Islands SAC. Adverse effects from deleterious substances entering habitat via surface water and groundwater-to-surface water pathways can be effectively prevented by mitigation measures ensuring protection of the natural (River Tolka) and artificial (Royal Canal) watercourses, both of which drain to Dublin Bay. During the operational phase, SuDS measures will mitigate against the potential for contamination from surface water run-off of hardstanding surfaces.

The spread of invasive species can also be controlled via mitigation measures, including pre-construction surveys, implementation of management plan and monitoring in subsequent years following treatment will be carried out in accordance with the Invasive Species Management Plan appended to the NIS.
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 Islands SAC.

15.11. **Table 6 – North Bull Island SPA**

Table 6			
North Bull Island SPA (Site code: 004006) Key Issues: • Loss of ex situ feeding sites. • Habitat degradation/ effects on QI/SCI species as a result of hydrological impacts. • Habitat degradation as a result of introducing/ spreading non-native invasive species. • Disturbance and displacement impacts. **Conservation Objectives:** https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004006.pdf			
		Summary of Appropriate Assessment	

Conservation Objective	Targets & Attributes (as relevant)	Potential adverse effects	Mitigation Measures	In-combination effects of Plans & Programmes/ Major Projects	Can adverse effects on site integrity be excluded?
To maintain the favourable conservation condition of the following:	**The favourable conservation status of a species is achieved when:**				
Light-bellied Brent Goose *Branta bernicla hrota* [A046]	Long-term population stable or increasing; and no significant decrease in range, timing or intensity of use of area.	**Construction Phase:** - Temporary and permanent habitat loss associated within construction phase, and deterioration of retained habitats through surface water, groundwater or air-based pollutants. Reduction and/or degrade of foraging grounds of SCI bird species, with impacts on insectivorous bird species (i.e. Black-	**Construction Stage Mitigation:** - As above *SCI Bird Construction Mitigations:* - Continuation of pre-construction wintering bird surveys up until the commencement of the enabling works / construction phase so that mitigation can be adjusted accordingly in the event of wintering bird species establish new foraging areas.	No in combination effect: - Plans subject to AA prior to adoption and contain policies and objectives to ensure protection of European sites. - Proposed major projects and proposed developments along the route, will be subject to planning consent, including AA screening and NIS as required, and it will be necessary to determine that the projects will not result	Yes With the effective implementation of mitigation measures, the proposed scheme will not have any adverse effect on the Special Conservation Interests of the SPA and will not therefore affect its integrity. - All of the mitigation measures set out in this NIS for visual and audible disturbance, as well as control of surface
Shelduck *Tadorna tadorna* [A048]	As above				
Teal *Anas crecca* [A052]	As above				
Pintail *Anas acuta* [A054]	As above				
Shoveler *Anas clypeata* [A056]	As above				
Oystercatcher *Haematopus ostralegus* [A130]	As above				
Golden Plover *Pluvialis apricaria* [A140]	As above				
Grey Plover *Pluvialis squatarol* [A141]	As above				

Knot *Calidris canutus* [A143]	As above	headed Gull and Curlew). - Light-bellied Brent Goose negatively impacted by the reduction in quantity and quality of their preferred grazing flora species. - SCI birds may come in contact with hydrocarbon pollution, impacting their feathers' insulative qualities and potentially being ingested when preening. - Direct ingestion of contaminated water by SCI species, potentially resulting in reduced egg production and hatching; increased clutch or brood abandonment; reduced growth and	- Continued monitoring of wintering bird populations during the construction phase by ECoW. - Seasonal construction constraints required to mitigate risk of disturbance to wintering bird species within the amenity grasslands, (no enabling or construction works to be conducted within 400m buffer for winter months). - Toolbox talk to site personnel about the wintering bird species, focusing on audible and visual disturbance. **Operational Phase:** - As above. - New bridges over the railway line / Royal Canal and River Tolka have been designed without cables in order to reduce the risk of SCI bird collision.	in adverse effects on European sites. - Prescribed mitigations will safeguard local vector pathways to European Sites, and moreover, there are mitigation measures outlining the requirement to liaise with other overlapping large-scale project teams. - Proposed scheme alone will not adversely affect the integrity of any European sites, and therefore will not act in combination any other major project to have an adverse effect on the integrity of any European sites.	water, groundwater, and dust will negate any residual impacts on the local surface water and groundwater networks, and the associated QI / SCI habitats and species. - No operational residual impacts given the appropriately designed SuDS features and the suitable operational noise levels of the light-rail network within the disturbance buffers of the SCI bird species.
Sanderling *Calidris alba* [A144]	As above				
Dunlin *Calidris alpina* alpin [A149]	As above				
Black-tailed Godwit *Limosa limosa* [A157]	As above				
Curlew *Numenius arquata* [A160]	As above				
Redshank *Tringa tetanus* [A162]	As above				
Turnstone *Arenaria interpres* [A169]	As above				
Black-headed Gull *Chroicocephalus ridibundus* [A179]	As above				

		increased organ weights. - Surface water, groundwater, and air (dust)-based pollution impacts could indirectly impact wintering bird species via the deterioration of food / prey items. - Wintering bird species that utilise the amenity grasslands within and adjacent to the site (i.e., Tolka Valley Park, Farnham, Mellowes Park and Erin's Isle playing pitches) for foraging purposes may be visually and/or audibly disturbed by the construction works. Light-bellied brent goose are heavily reliant on inland foraging. - Impacts on water quality from accidental pollutant discharges	- Installation of deflectors on wires parallel to the overhead lines at a number of strategic locations to mitigate for the risk of collision with overhead lines. - 24-month post-construction monitoring period will be conducted by a suitably qualified wintering bird ecology team on the migrant wintering bird species, in particular the Light-bellied Brent Goose, to establish any changes to flock.		

		may temporarily affect the population distribution of SCI bird species, with pollution events driving individuals away from the affected area. **Operational Stage Effects:** - Due to SuDS measures, surface waterbodies, which hydrologically connect the proposed scheme with the designated sites, will not experience any operational contamination from surface water run-off of hardstanding surfaces. - Operational disturbance of SCI birds from the light-rail activity will be negligible, as they are already habituated to a regularised baseline noise levels of 54dB at			

		distances as close as 50m. - Visual disturbance from increased pedestrian traffic, with associated activities such as dog-walking, will prove to be more disruptive to SCI birds than the operation of the LRT. Species will be sheltered from disturbance by walls and trees. - Terrestrial habitats within and directly adjacent to the proposed Scheme will not experience any operational contamination, protecting the terrestrial habitats and the foraging resources of SCI bird species therewithin.			
Wetlands [A999]	Permanent area occupied by the wetland habitat should be stable and not significantly less than the area of 1,713 hectare.	- As above. - Impacts on surface water quality from accidental pollutant			

		discharges may temporarily reduce the total functional habitat area through degradation of flora and local ecological food chains.			

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 this European site in view of its conservation objectives.

Based on the information provided, I am satisfied that adverse effects can be excluded for 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 deleterious substances entering habitat via surface water and groundwater-to-surface water pathways can be effectively prevented by mitigation measures ensuring protection of the natural (River Tolka) and artificial (Royal Canal) watercourses, both of which drain to Dublin Bay. During the operational phase, SuDS measures will mitigate against the potential for contamination from surface water run-off of hardstanding surfaces.

The spread of invasive species can also be controlled via mitigation measures, including pre-construction surveys, implementation of management plan and monitoring in subsequent years following treatment will be carried out in accordance with the Invasive Species Management Plan appended to the NIS.

There is potential for reduction and/ or degradation of ex-situ foraging grounds for SCI species within the ZoI of proposed scheme. Wintering bird species utilise the amenity grasslands within and adjacent to the site (i.e., Tolka Valley Park, Farnham, Mellows Park and Erin's Isle playing pitches) for foraging purposes and may be visually and/or audibly disturbed by the construction works. Seasonal construction constraints will mitigate the risk to wintering birds within amenity grasslands and continued monitoring will be carried out during construction and for 24 months post construction. Operational phase mitigations will include bridge design without

cables and deflectors on overhead lines to mitigate for the risk of collision. Operational disturbance from the LRT will be negligible as SCI birds are already habituated to a regularised baseline noise levels of 54dB at distances as close as 50m. SCI bird species will be sheltered from visual disturbance by walls and trees.

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 this SPA site in Dublin Bay and beyond.

15.12. Table 7 – South Dublin Bay and River Tolka Estuary SPA

Table 7

South Dublin Bay and River Tolka Estuary SPA (Site code: 004024)

Key Issues:

- Loss of ex situ feeding sites.
- Habitat degradation/ effects on QI/SCI species as a result of hydrological impacts.
- Habitat degradation as a result of introducing/ spreading non-native invasive species.
- Disturbance and displacement impacts.

Conservation Objectives: https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004024.pdf					
		Summary of Appropriate Assessment			
Conservation Objective	Targets & Attributes (as relevant)	Potential adverse effects	Mitigation Measures	In-combination effects of Plans & Programmes/ Major Projects	Can adverse effects on site integrity be excluded?
To maintain the favourable conservation condition of the following:	**The favourable conservation status of a species is achieved when:**				
Light-bellied Brent Goose *Branta bernicla hrota* [A046]	Long-term population stable or increasing; and no significant decrease in range, timing or intensity of use of area.	**Construction Phase:** - Temporary and permanent habitat loss associated within construction phase, and deterioration of retained habitats through surface water, groundwater or air-based pollutants. Reduction and/or degrade of foraging grounds of SCI bird species, with impacts	**Construction Stage Mitigation:** - As above *SCI Bird Construction Mitigations:* - Continuation of pre-construction wintering bird surveys up until the commencement of the enabling works / construction phase so that mitigation can be adjusted	No in combination effect: - Plans subject to AA prior to adoption and contain policies and objectives to ensure protection of European sites. - Proposed major projects and proposed developments along the route, will be subject to planning	Yes With the effective implementation of mitigation measures, the proposed scheme will not have any adverse effect on the Special Conservation Interests of the SPA and will not therefore affect its integrity.
Oystercatcher *Haematopus ostralegus* [A130]	As above				
Ringed Plover *Charadrius hiaticula* [A137]	As above				
Grey Plover *Pluvialis squatarol* [A141]	Proposed for removal				
Knot *Calidris canutus* [A143]	Long-term population stable or increasing; and no significant				

	decrease in range, timing or intensity of use of area.	on insectivorous bird species (i.e. Black-headed Gull). - Light-bellied Brent Goose negatively impacted by the reduction in quantity and quality of their preferred grazing flora species. - SCI birds may come in contact with hydrocarbon pollution, impacting their feathers' insulative qualities and potentially being ingested when preening. - Direct ingestion of contaminated water by SCI species, potentially resulting in reduced egg production and hatching; increased clutch or brood abandonment; reduced growth and	accordingly in the event of wintering bird species establish new foraging areas. - Continued monitoring of wintering bird populations during the construction phase by ECoW. - Seasonal construction constraints required to mitigate risk of disturbance to wintering bird species within the amenity grasslands, (no enabling or construction works to be conducted within 400m buffer for winter months). - Toolbox talk to site personnel about the wintering bird species, focusing on audible and visual disturbance. **Operational Phase:** - As above. - New bridges over the railway line / Royal Canal and River Tolka have been designed without cables in order to reduce	consent, including AA screening and NIS as required, and it will be necessary to determine that the projects will not result in adverse effects on European sites. - Prescribed mitigations will safeguard local vector pathways to European Sites, and moreover, there are mitigation measures outlining the requirement to liaise with other overlapping large-scale project teams. - Proposed scheme alone will not adversely affect the integrity of any European sites, and therefore will not act in combination any other major project to have an adverse effect on the integrity of any European sites.	- All of the mitigation measures set out in this NIS for visual and audible disturbance, as well as control of surface water, groundwater, and dust will negate any residual impacts on the local surface water and groundwater networks, and the associated QI / SCI habitats and species. - No operational residual impacts given the appropriately designed SuDS features and the suitable operational noise levels of the light-rail network within the disturbance buffers of the SCI bird species.
Sanderling *Calidris alba* [A144]	As above				
Dunlin *Calidris alpina* alpin [A149]	As above				
Bar-tailed Godwit *Limosa limosa* [A157]	As above				
Redshank *Tringa tetanus* [A162]	As above				
Black-headed Gull *Chroicocephalus ridibundus* [A179]	As above				
Roseate Tern *Sterna dougallii* [A192]	No significant decline of breeding population, productivity rate, passage population, breeding colonies, roosting areas, available prey biomass and barrier to connectivity; and human activities should occur at levels that do not adversely breeding and numbers among the post-breeding aggregation.				
Common Tern *Sterna hirundo* [A193]	No significant decline of breeding population, productivity rate, passage population, breeding colonies, roosting areas, available prey biomass and barrier to connectivity; and human activities should occur at levels that do not adversely				

	breeding and numbers among the post-breeding aggregation.	increased organ weights. - Surface water, groundwater, and air (dust)-based pollution impacts could indirectly impact wintering bird species via the deterioration of food / prey items. - Wintering bird species that utilise the amenity grasslands within and adjacent to the site (i.e., Tolka Valley Park, Farnham, Mellowes Park and Erin's Isle playing pitches) for foraging purposes may be visually and/or audibly disturbed by the construction works. Light-bellied brent goose are heavily reliant on inland foraging. - Impacts on water quality from accidental pollutant discharges	the risk of SCI bird collision. - Installation of deflectors on wires parallel to the overhead lines at a number of strategic locations to mitigate for the risk of collision with overhead lines. - 24-month post-construction monitoring period will be conducted by a suitably qualified wintering bird ecology team on the migrant wintering bird species, in particular the Light-bellied Brent Goose, to establish any changes to flock.		
Arctic Tern *Sterna paradisaea* [A194]	No significant decline of passage population, roosting areas, available prey biomass and barrier to connectivity; and human activities should occur at levels that do not adversely affect numbers among the post-breeding aggregation.				
Wetlands and Waterbirds [A999]	Permanent area occupied by the wetland habitat should be stable and not significantly less than the area of 2,192 hectare.				

		may temporarily affect the population distribution of SCI bird species, with pollution events driving individuals away from the affected area. - Impacts on surface water quality from accidental pollutant discharges may temporarily reduce to the total functional habitat area through degradation of flora and local ecological food chains. **Operational Stage Effects:** - Due to SuDS measures, surface waterbodies, which hydrologically connect the proposed scheme with the designated sites, will not experience any operational contamination from surface water run-off			

		of hardstanding surfaces. - Operational disturbance of SCI birds from the light-rail activity will be negligible, as they are already habituated to a regularised baseline noise levels of 54dB at distances as close as 50m. - Visual disturbance from increased pedestrian traffic, with associated activities such as dog-walking, will prove to be more disruptive to SCI birds than the operation of the LRT. Species will be sheltered from disturbance by walls and trees. - Terrestrial habitats within and directly adjacent to the proposed Scheme will not experience any operational			

		contamination, protecting the terrestrial habitats and the foraging resources of SCI bird species therewithin.			

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 this European site in view of its conservation objectives.

Based on the information provided, I am satisfied that adverse effects can be excluded for 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 deleterious substances entering habitat via surface water and groundwater-to-surface water pathways can be effectively prevented by mitigation measures ensuring protection of the natural (River Tolka) and artificial (Royal Canal) watercourses, both of which drain to Dublin Bay. During the operational phase, SuDS measures will mitigate against the potential for contamination from surface water run-off of hardstanding surfaces.

The spread of invasive species can also be controlled via mitigation measures, including pre-construction surveys, implementation of management plan and monitoring in subsequent years following treatment will be carried out in accordance with the Invasive Species Management Plan appended to the NIS.

There is potential for reduction and/ or degradation of ex-situ foraging grounds for SCI species within the ZoI of proposed scheme. Wintering bird species utilise the amenity grasslands within and adjacent to the site (i.e., Tolka Valley Park, Farnham, Mellows Park and Erin's Isle playing pitches) for foraging purposes and may be visually and/or audibly disturbed by the construction works. Seasonal construction constraints will mitigate the risk to wintering birds within amenity grasslands and continued monitoring will be carried out during construction and for 24 months post construction. Operational phase mitigations will include bridge design without cables and deflectors on overhead lines to mitigate for the risk of collision. Operational disturbance from the LRT will be negligible as SCI birds are already habituated to a regularised baseline noise levels of 54dB at distances as close as 50m. SCI bird species will be sheltered from visual disturbance by walls and trees.

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 this SPA site in Dublin Bay and beyond.

15.13. Table 8 - North-West Irish Sea SPA

Table 8

North-West Irish Sea SPA (Site code: 004236)

Key Issues:

- Habitat loss and fragmentation.
- Habitat degradation/ effects on QI/SCI species as a result of hydrological impacts.
- Disturbance and displacement impacts.

		Summary of Appropriate Assessment			
Conservation Objective	Targets & Attributes (as relevant)	Potential adverse effects	Mitigation Measures	In-combination effects of Plans &	Can adverse effects on site

				Programmes/ Major Projects	integrity be excluded?
To maintain or restore the favourable conservation condition of the following:	**The favourable conservation status of a species is achieved when:**				
Common Scoter (Melanitta nigra) [A065] Red-throated Diver (Gavia stellata) [A001] Great Northern Diver (Gavia immer) [A003] Fulmar (Fulmarus glacialis) [A009] Manx Shearwater (Puffinus puffinus) [A013] Shag (Phalacrocorax aristotelis) [A018] Cormorant (Phalacrocorax carbo) [A017]	No significant decline, stable or increasing population trends, sufficient number of locations, area and availability of suitable habitat to support the population, sufficient number of locations, area of suitable habitat and available forage biomass to support population target, intensity, frequency, timing and duration of disturbance, barriers not significantly impacting populations access to the SPA or other ecologically important sites outside the SPA.	**Construction Stage:** - Temporary and permanent habitat loss associated within construction phase, and deterioration of retained habitats through surface water, groundwater or air-based pollutants. Reduction and/or degrade of foraging grounds of SCI bird species, with impacts on insectivorous bird species (i.e. Black-headed Gull and Common Gull). - SCI birds may come in contact with	**Construction Stage Mitigation:** - As above *SCI Bird Construction Mitigations:* - Continuation of pre-construction wintering bird surveys up until the commencement of the enabling works / construction phase so that mitigation can be adjusted accordingly in the event of wintering bird species establish new foraging areas. - Continued monitoring of wintering bird populations	No in combination effect: - Plans subject to AA prior to adoption and contain policies and objectives to ensure protection of European sites. - Proposed major projects and proposed developments along the route, will be subject to planning consent, including AA screening and NIS as required, and it will be necessary to determine that the projects will not result in adverse effects on European sites.	Yes With the effective implementation of mitigation measures, the proposed scheme will not have any adverse effect on the Special Conservation Interests of the SPA and will not therefore affect its integrity. - All of the mitigation measures set out in this NIS for visual and audible disturbance, as well as control of surface water, groundwater, and dust will negate

Little Gull (Larus minutus) [A177]		hydrocarbon pollution, impacting their feathers' insulative qualities and potentially being ingested when preening. - Direct ingestion of contaminated water by SCI species, potentially resulting in reduced egg production and hatching; increased clutch or brood abandonment; reduced growth and increased organ weights. - Wintering bird species that utilise the amenity grasslands within and adjacent to the site (i.e., Tolka Valley Park, Farnham, Mellowes Park and Erin's Isle playing pitches) for foraging purposes may be visually and/or audibly disturbed by the	during the construction phase by ECoW. - Seasonal construction constraints required to mitigate risk of disturbance to wintering bird species within the amenity grasslands, (no enabling or construction works to be conducted within 400m buffer for winter months). - Toolbox talk to site personnel about the wintering bird species, focusing on audible and visual disturbance. **Operational Phase:** - As above. - New bridges over the railway line / Royal Canal and River Tolka have been designed without cables in order to reduce the risk of SCI bird collision. - Installation of deflectors on wires parallel to the overhead lines at a number of strategic locations to mitigate for	- Prescribed mitigations will safeguard local vector pathways to European Sites, and moreover, there are mitigation measures outlining the requirement to liaise with other overlapping large-scale project teams. - Proposed scheme alone will not adversely affect the integrity of any European sites, and therefore will not act in combination any other major project to have an adverse effect on the integrity of any European sites.	any residual impacts on the local surface water and groundwater networks, and the associated QI / SCI habitats and species. - No operational residual impacts given the appropriately designed SuDS features and the suitable operational noise levels of the light-rail network within the disturbance buffers of the SCI bird species.
Kittiwake (Rissa tridactyla) [A188]					
Black-headed Gull *Chroicocephalus ridibundus* [A179]					
Common Gull (Larus canus) [A182]					
Lesser Black-backed Gull (Larus fuscus) [A183]					
Herring Gull (Larus argentatus) [A184]					
Great Black-backed Gull (Larus marinus) [A187]					
Little Tern *Sterna albifrons* [A195]					
Roseate Tern (Sterna dougallii) [A192]					
Common Tern (Sterna hirundo) [A193]					
Arctic Tern (Sterna paradisaea) [A194]					

Puffin (Fratercula arctica) [A204]		construction works. Light-bellied brent goose are heavily reliant on inland foraging. - Impacts on water quality from accidental pollutant discharges may temporarily affect the population distribution of SCI bird species, with pollution events driving individuals away from the affected area. - Surface water, groundwater, and air (dust)- based pollution impacts could indirectly impact SCI bird species via the deterioration of food / prey items. **Operational Stage Effects:** - Due to SuDS measures, surface waterbodies, which hydrologically connect	the risk of collision with overhead lines. - 24-month post-construction monitoring period will be conducted by a suitably qualified wintering bird ecology team on the migrant wintering bird species, in particular the Light-bellied Brent Goose, to establish any changes to flock.		
Razorbill (Alca torda) [A200]					
Guillemot (Uria aalge) [A199]					

		the proposed scheme with the designated sites, will not experience any operational contamination from surface water run-off of hardstanding surfaces. - Operational disturbance of SCI birds from the light-rail activity will be negligible, as they are already habituated to a regularised baseline noise levels of 54dB at distances as close as 50m. - Visual disturbance from increased pedestrian traffic, with associated activities such as dog-walking, will prove to be more disruptive to SCI birds than the operation of the LRT. Species will be sheltered from			

		disturbance by walls and trees. - Terrestrial habitats within and directly adjacent to the proposed Scheme will not experience any operational contamination, protecting the terrestrial habitats and the foraging resources of SCI bird species therewithin.			

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 this European site in view of its conservation objectives.

Based on the information provided, I am satisfied that adverse effects can be excluded for 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 deleterious substances entering habitat via surface water and groundwater-to-surface water pathways can be effectively prevented by mitigation measures ensuring protection of the natural (River Tolka) and artificial (Royal Canal) watercourses, both of which drain to Dublin Bay. During the operational phase, SuDS measures will mitigate against the potential for contamination from surface water run-off of hardstanding surfaces.

The spread of invasive species can also be controlled via mitigation measures, including pre-construction surveys, implementation of management plan and monitoring in subsequent years following treatment will be carried out in accordance with the Invasive Species Management Plan appended to the NIS.

There is potential for reduction and/ or degradation of ex-situ foraging grounds for SCI species within the ZoI of proposed scheme. Wintering bird species utilise the amenity grasslands within and adjacent to the site (i.e., Tolka Valley Park, Farnham, Mellowes Park and Erin's Isle playing pitches) for foraging purposes and may be visually and/or audibly disturbed by the construction works. Seasonal construction constraints will mitigate the risk to wintering birds within amenity grasslands and continued monitoring will be carried out during construction and for 24 months post construction. Operational phase mitigations will include bridge design without cables and deflectors on overhead lines to mitigate for the risk of collision. Operational disturbance from the LRT will be negligible as SCI birds are already habituated to a regularised baseline noise levels of 54dB at distances as close as 50m. SCI bird species will be sheltered from visual disturbance by walls and trees.

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 this SPA site in Dublin Bay and beyond.

15.14. Appropriate Assessment Conclusions

15.14.1. Having carried out screening for appropriate assessment of the proposed Luas Finglas scheme, it was concluded that it may result in significant effects on the South Dublin Bay SAC, North Dublin Bay SAC, Rockabill to Dalkey Islands SAC, North Bull Island SPA, South Dublin Bay and River Tolka Estuary SPA, and North West Irish Sea SPA. Consequently, an appropriate assessment was required of the implications of the project on the qualifying features of these sites in light of their conservation objectives.

15.14.2. Following an appropriate assessment, it has been ascertained that the proposed development, individually or in combination with other plans or projects would not adversely affect the integrity of these European sites, or any other European site, in view of the sites' Conservation Objectives. No reasonable scientific doubt remains as to the absence of such effects.

15.14.3. This conclusion is based on:

- A full and detailed assessment of all aspects of the proposed project including proposed mitigation measures and ecological monitoring in relation to the Conservation Objectives of the South Dublin Bay SAC, North Dublin Bay SAC, Rockabill to Dalkey Islands SAC, North Bull Island SPA, South Dublin Bay and River Tolka Estuary SPA, and North West Irish Sea SPA.
- Detailed assessment of all aspects of the proposed development that could result in significant effects on European sites within a zone of influence of the proposed scheme.
- Application of mitigation measures designed to avoid adverse effects on site integrity and likely effectiveness of same.
- Detailed assessment of in combination effects with other plans and projects including historical projects, current proposals and future plans.

- No reasonable scientific doubt as to the absence of adverse effects on the integrity of the South Dublin Bay SAC, North Dublin Bay SAC, Rockabill to Dalkey Islands SAC, North Bull Island SPA, South Dublin Bay and River Tolka Estuary SPA, and North West Irish Sea SPA

16.0 Compulsory Purchase Order

16.1. For the Board to confirm the subject CPO, it must be satisfied that TII has demonstrated that the CPO is clearly justified by the "common good". Case law[5] has determined that, in order to satisfy the common good, the following minimum criteria are required.

- The works to be carried out should accord or at least not be in material contravention of the policy and objectives contained in the statutory development plan relating to the area.
- There is a community need that is to be met by the acquisition of the lands in question.
- The project proposed and the associated acquisition of lands is suitable to meet the community need.
- Any alternative method of meeting the community need have been considered but are not demonstrably preferable.
- The extent of land-take should have due regard to the issue of proportionality.

16.2. The Board should note that a number of these issues have been raised in preceding sections of this assessment which should therefore be read in conjunction with the CPO assessment.

[5] See also Mc Dermott and Woulfe 'Compulsory Purchase and Compensation in Ireland: Law and Practice' (1992).

16.3. Development Plan Compliance

16.3.1. The proposed Luas Finglas scheme continues through areas administered by Dublin City Council and Fingal County Council. The policy contexts for the Dublin City Development Plan 2022-2028 and the Fingal County Development Plan 2023-2029 are set out in Sections 9.12 and 9.15 of this report respectively.

16.3.2. Section 9 above details the consistent message within all levels of policy at EU, national and regional level, and reflected at local level within the Dublin City Development Plan 2022-2028 and the Fingal County Development Plan 2023-2029, that there must be a transition to a low carbon and climate resilient society, and that active and sustainable mobility must be encouraged to reduce congestion and emissions.

16.3.3. The main objectives of the proposed scheme include the delivery of an efficient, low carbon and climate resilient public transport service, which supports the achievement of Ireland's emission reduction targets, as well as the enhancement of the potential for cycling by providing safe cycling infrastructure, segregated from general traffic, wherever practicable.

16.3.4. These scheme objectives fully accord with the aims of the current Dublin City Development Plan to transition to more sustainable travel modes, including walking, cycling and public transport, and to move away from private car and fossil-fuel-based mobility to reduce the negative impacts of transport and climate change. The proposed scheme also provides opportunities for developing public realm around new public transport proposals, as sought by Development Plan policies pertaining to pedestrians and public realm; urban villages and the 15-minute city; and integration of active travel with public transport. Luas Finglas is identified as a key transport proposal in the Dublin City Development Plan, the expeditious delivery of which will provide an integrated public transport network with efficient interchange between modes.

16.3.5. One of the key strategic objectives of the current Fingal County Development Plan is to strengthen the integration of land-use and transport planning, with a priority focus on increased provision of walking, cycling and public transport infrastructure. The role of transportation policy in addressing climate change is encouraged through modal shift and reduction in traffic congestion and harmful emissions.

16.3.6. Having regard to the above, I am satisfied that the proposed scheme is justified and in overwhelmingly in accordance with the overriding development plan policy position as set out within the policy section of this report above.

16.4. Community Need

16.4.1. The proposed scheme is being developed in response to the need for a sustainable, reliable form of public transport, and a safe and comfortable active transport network serving this part of Dublin city. Sustainable transport infrastructure is known to assist in creating better communities and places to live and work, while also stimulating economic development and enhanced health and well-being when delivered effectively. In this context, it can be reasonably argued that a community need is being fulfilled with the implementation of this project.

16.4.2. Critically, there needs to be improved scope to avoid travel altogether or to shift away from private car use to more sustainable means. The existing means of travel must also be improved in terms of emissions. Improvement could mean a reduction in vehicle size, e.g., a personal electric vehicle instead of an electric car. The effect of these avoid-shift-improve measures will be less on-street congestion and the ability of the transport to move more people safely, comfortably, reliably and in a more environmentally friendly manner.

16.4.3. The more active usage of urban green spaces and streets, the more community benefits this will have through increased comfort and interaction between people. Other benefits to the community include better accessibility to community facilities; passive surveillance making places safer; people meeting each other and creating a

sense of community; better air quality and reduced noise; and improved public realm.

16.4.4. The community benefits of the proposed scheme are set out above. However, the issue of community need becomes more apparent when population growth forecasts are factored in. According to the National Planning Framework, 2018, the population of the Greater Dublin Area is forecast to increase by 25% by 2040. Significant congestion already occurs throughout the GDA from private car dependence and intervention is therefore required to prioritise the movement of people over the movement of vehicles. 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.

16.4.5. Overall, the proposed scheme will deliver essential physical infrastructure necessary to sustain the projected population growth along the corridor. It will also provide more accessible and reliable public transport to the most disadvantaged and vulnerable in society and will facilitate safer and more comfortable active travel. It is clear that there is an obvious community need and justification for the proposed scheme from a population growth and congestion perspective; through the provision of the necessary connections and opportunities for all sections of the local community; and in terms of the wider community benefits that the proposed scheme will bring.

16.5. Suitability of Land to Meet Community Need

16.5.1. It is proposed to permanently acquire land along the proposed Luas extension corridor and additional land will be temporarily acquired for construction works. At present the land is mostly in private amenity, recreational, commercial and community use. No habitable dwellings will be permanently acquired. The Board should note that the scheme for the most part will comprise lands within the existing public road and public open spaces.

16.5.2. The extent of the land that would be acquired under the order is determined by the specifications of the proposed Luas scheme layout and associated construction works. I would be in agreement that the land-take for the proposed CPO along the corridor is necessary and proportional to ensure the delivery of the proposed scheme to appropriate standards as designed.

16.5.3. The proposed scheme passes by “red-hatched” conservation areas at the Royal Canal and River Tolka, as well as the Record of Monuments and Places at Finglas, and the Strategic Development and Regeneration Area at Jamestown. A Draft masterplan has also been prepared for Ballyboggan. It is considered that the proposed works are compatible with the objectives of these designations and will not prevent or negatively impact the achievement of same. Zonings pertaining to the lands along the alignment from include the following:

- Z10 Inner Suburban and Inner City Sustainable Mixed-Uses (DCC)
- Z6 – Employment/ Enterprise
- Z9 Amenity/ Open Space Lands/ Green Network
- Z1 – Sustainable Residential Neighbourhoods
- Z4 – Key Urban Villages/ Urban Villages
- Z14: Strategic Development and Regeneration Area 3: Finglas Village Environs and Jamestown Lands.
- TC-Town and District Centre (FCC)
- OS-Open Space
- GE-General Employment

16.5.4. The proposed scheme will continue through or along the edge of open space lands that are either zoned for residential use or as amenity/ open space within the Dublin City Development Plan. I note that the secondary elements of the proposed scheme, such as tram stops and poles fall within the definition of Public Service Installations as defined within Appendix 21 of the Dublin City Development Plan, or

as Utility Installations as defined within the Fingal County Development Plan. I am satisfied that these elements of the proposed works, along with the use of public street and green space for the provision of public transport and active travel infrastructure, are compatible with the zoning objectives of both Development Plans.

16.5.5. Due to the restricted width of the existing carriageway along certain sections, the proposed scheme encroaches minimally onto third party lands to allow for provision of the proposed Luas infrastructure. Areas of land will be temporarily acquired mainly alongside and on the third-party side of the lands to be permanently acquired. Land acquisition typically comprises of narrow roadside strips. Areas of land will be temporality acquired to accommodate construction compounds and will be landscaped and returned to their original use once construction is complete.

16.5.6. The CPO and Schedule and corresponding deposit map booklet clearly identify all lands that are being acquired on both a permanent and temporary basis, as well as locations where public and private rights of ways are being extinguished, acquired, restricted or otherwise interfered with.

16.5.7. Overall, given the current use of lands and the minimal additional lands to be acquired, which lie directly adjacent to the existing carriageway and footpath or through areas of public open space, I am satisfied that the lands to be acquired are suitable and appropriate for such use and for the community need.

16.6. Alternatives

16.6.1. An assessment of reasonable alternatives set out in Section 14.6 of the EIA considers a range of alternatives in respect of previous studies, strategic alternatives, the do-nothing scenario, alternative route options, the emerging preferred route, the preferred route, technological alternatives, and consideration of alternatives for construction. It is concluded that all reasonable alternatives that are relevant to the design of the project and its specific characteristics as presented are clearly set out in the EIAR. The main reasons for the chosen options and the

development of the design process are included, together with the consideration of alternatives for the construction phase.

16.6.2. Multi-Criteria Analysis was carried out against environmental considerations such as biodiversity, land, soils, waste, water, air, climate, noise and vibration, electromagnetic radiation and stray current, material assets – property and agronomy, landscape, population and human health, vulnerability of the proposed scheme to risks of major accidents and / or disasters, and cultural heritage. The appraisal criteria of Economy, Safety, Environment, Accessibility and Social Inclusion and Integration were then considered in greater detail for each of the 14 route options. It was noted that all route options will result in some degree of both temporary and permanent land take; however, land was not considered to be a significant differentiator in determining preferred routes.

16.6.3. The result of the process was the selection of four feasible route options taken to a more detailed Multi-Criteria Analysis (MCA2), including Cost Benefit Analysis (CBA). An emerging preferred route was identified as the shortest in length and with the highest catchment per kilometre. An option further to the west serving more disadvantaged areas is better for social cohesion and will better integrate with existing and planned public transport. Shorter lengths of shared track with the road network are considered to be the safest options for road users, cyclists and pedestrians.

16.6.4. 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. This includes alternatives for Broombridge Road track and road layout, Tolka Valley Park, St. Helena's Stop location, Farnham Crescent Park, Casement Road and Patrickswell Place, McKee Avenue/ St. Margaret's Road junction, and Mellowes Crescent and Court. As a result of the Mellowes Crescent and Court assessment, the route was altered to continue passed Ravens Court and through the Garda Station car park.

16.6.5. 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. The consideration of alternatives also factors in the surrounding catchments.

16.7. Proportionality of Land Take

16.7.1. I consider that the land to be acquired permanently for the operation of the proposed scheme, and temporarily for the construction phase, is modest and proportionate, and is required in the context of meeting an identified community need. The land take ensures that as far as practically possible, geometric design standards to facilitate the Luas infrastructure, cycle paths, pedestrian movement and general traffic movement are adhered to, and that such land take is commensurate with the requirements to implement the project to a sufficient design standard.

16.8. CPO Issues Common to Multiple Objectors

16.8.1. Concerns were raised in relation to a number of common issues which are examined hereunder. The Board should note that concerns relating to planning matters such as noise, air and visual and residential amenity impacts are dealt with in the EIA under Section 14 and the planning assessment under Section 13 of this report.

<u>Property Value</u>

16.8.2. Residents and businesses are concerned that the proposed scheme will devalue their properties. I would be of the opinion that in overall terms the public realm improvements as part of the proposed scheme will lead to an increase in value of both residential and retail property prices, especially in the community centres along the corridor. There is evidence that investing in public realm creates places that are more desirable for people and business to locate in, with the effect of increasing the value of properties in the area rather than devaluing it, as suggested in some of the submissions.

16.8.3. In general, the presence of high-quality public transport, such as Luas, has the potential to increase business and property values in proximity to the line by increasing accessibility. It is also acknowledged, however, by TII that the value of properties can fall if subject to negative environmental effects by virtue of being in very close proximity to tracks. Notwithstanding this, it has been demonstrated in the EIA that impacts will not be significant to an extent that would warrant refusal of permission. Moreover, in many cases, adverse effects will be offset by the positive impacts associated with the location in proximity to a tram stop.

Impact on Business Operations

16.8.4. TII has confirmed that access to commercial properties will be maintained during the construction phase of the proposed scheme and the manner in which businesses access their properties at present will remain largely unchanged once the scheme is operational. There are cases where access arrangements will change significantly; however, existing accesses will remain in place until new road and access proposals are fully available for use.

16.8.5. During construction, TII confirms that arrangements will be made on a case-by-case basis to maintain continued access to businesses affected by the works, at all times, where practicable, and measures will be put in place to provide for adequate security. Advanced public consultation and stakeholder engagement will reduce the significance of traffic management arrangements on access to businesses. A safe route for pedestrians will be provided past the work area matching existing facilities, were practicable.

16.8.6. There will inevitably be some loss of parking and disruption to businesses operation on a permanent basis but most impacts will be temporary in nature. The CEMP sets out a management framework for the delivery of the proposed construction works and illustrates how the proposed scheme could be delivered in a logical, sensible, and safe sequence with the incorporation of specific environmental commitments. Businesses will also be entitled to submit a claim for compensation and a CPO guide and Land Acquisition Strategy will be published by TII.

Boundary Impacts

16.8.7. A number of residential and commercial objectors are concerned that the proposed scheme will impact on their boundaries during construction and operational phases. Issues are raised regarding the protection of privacy, security arrangements, boundary treatment and detailed design.

16.8.8. TII confirm that new boundary walls and fences will be provided and any relocation will be agreed with landowner as part of the compensation agreements. Existing security fencing, boundaries and access are normally replaced on a like for like basis as close as possible to the line of the permanent land acquisition, and in many cases, the temporary land acquisition is for the purposes of carrying out this work. Any underground electrical services can be accommodated during the construction phase. Overall, construction works will be carried out in a manner that minimises disturbance to residents, businesses and road users. Upon completion, new quality surfaces and property boundary treatments can represent a significant positive aspect of the proposed scheme.

16.8.9. I am satisfied that the proposed permanent and temporary land acquisitions are necessary and proportionate to construct the proposed scheme and to reinstate property boundaries where necessary. If the CPO is confirmed, a Notice to Treat will be served on the landowner, who will be required to submit a claim for compensation. The issue of compensation for loss of land and other issues such as the devaluation of property are matters for arbitration.

Impacts on Development Potential/ Capacity

16.8.10. It was highlighted in a number of submissions that the proposed scheme could impact on the development potential of lands, e.g. commercial properties on St. Margaret's Road. The applicant stated in response that any issues concerning development potential will be addressed via the CPO process in the event of the Railway Order being approved. I would also highlight that the proposed scheme will contribute to the development potential of lands along the corridor. Lands with development potential adjacent to the corridor are reliant on the proposed scheme to

achieve Transport Orientated Development at Ballyboggan and Jamestown. New business opportunities will also arise when the proposed scheme becomes operational, with advantages associated with improved access into the area. In this regard, it is noted by Dublin City Council that Luas Finglas is fundamental to ensuring the successful delivery of regeneration at Jamestown based on planned and coherent integration between public transport infrastructure, land use and function. Moreover, a masterplan for Ballyboggan is being developed in full anticipation of the Luas Finglas extension and will be consistent with TII's proposals as presented in the Railway Order. The NTA also submit that the proposed scheme will provide for close integration of land use planning and transport planning by facilitating compact growth in Ballyboggan, Jamestown and Charlestown through the provision of high capacity connectivity to range of employment destinations and other services.

Engagement with Jamestown Masterplan

16.8.11. A number of submissions refer to the Jamestown Masterplan and consider that the proposed scheme has not fully engaged with this project and may be premature. Observers submit that access roads do not align with those illustrated in the masterplan. It is therefore considered that the EIAR is incomplete due to the lack of proper information regarding how the proposed design correlates with the adopted Jamestown Masterplan.

16.8.12. In response, the applicant stated that the proposed scheme will not compromise the integrity of the green infrastructure strategy outlined for the Jamestown Masterplan. The applicant is nonetheless committed to engagement at detailed design in relation to the new access road through Jamestown Industrial Estate. It is emphasised that the acquisition of the internal road owned by Adrez Ltd. is necessary for the Luas Finglas scheme, and will ensure continuous access to existing properties in Jamestown Little Industrial Estate. Dublin City Council also confirms that regenerative mixed use development proposals along the proposed route at, *inter alia*, Jamestown, *"have / are being developed to ensure compatibility with the project*

delivery and future operation" of the Luas. The proposed scheme complies with the movement strategy and will deliver a local street consistent with the masterplan framework.

16.8.13. In general, I consider that the proposed scheme will help to achieve the visions and objectives of the Jamestown Masterplan. I also note that the masterplan includes measures to support existing uses while facilitating envisaged masterplan change in the area. In this regard, it the stated that *"any proposed expansion of existing business operations or the provision of on-site movement requirements that differ from those set out in the Masterplan will not be restricted, as long as they relate to the current established businesses and uses on site."*

Engagement in the Process

16.8.14. Third parties raised concerns and expressed dissatisfaction in relation to the level of engagement with the process. I have reviewed the file in relation to engagement with landowners and note that TII has complied with its statutory obligations in this regard. Landowners have been property notified and the process advertised accordingly. I am therefore fully satisfied in relation to TII's compliance with the relevant legislation in this regard.

16.8.15. I note that the appointed contractor will ensure dialogue between property owners and TII with respect to any accommodation works to be carried out. In response to concerns raised on the detailed design of replacement boundaries, the Board should note that such matters are appropriately dealt with as part of the detailed accommodation works plans in consultation with impacted landowners upon confirmation of CPO.

Detailed Design

16.8.16. A number of parties submit that the level of detail on application drawings is insufficient. It is contended that only the landscape drawings and Alignment Details Book indicate anything remotely resembling a layout and neither of these sets of drawings could be construed as being detailed design. The lack of detailed design and

site specific mitigation is considered to be insufficient for showing how existing business can continue to operate and therefore it is submitted that it would be premature for the Board to approve the scheme at this juncture.

16.8.17. In response, TII confirm that level of detail contained in the application is appropriate for the planning stage. Further dialogue is planned to refine detailed design and co-ordinated drawings will be developed in accordance with the permitted Railway Order design for agreement prior to the tender of construction works. A detailed road safety audit of the whole scheme for consultation with Dublin City Council will be prepared at the detailed design stage. Risk assessments will also be carried out for impacts on protected structures and for anti-social behaviour and public safety at locations along the proposed route.

16.8.18. Other matters to be addressed at detailed design stage are the layout and design of utility cabinets, poles and other above ground infrastructure; materials and finishes; footpath widths; cycle infrastructure aligning with Cycle Design Manual 2023 and consideration of greater segregation between cyclists and pedestrians; accessibility audit; further information on public realm improvements; further detail on Broombridge station and Luas stop, Finglas substation and Luas stop, St. Margaret's Station and plaza, and Charlestown junction; provision of mobility hubs; interaction with Royal Canal Greenway; SuDS and drainage features; stop lines and vehicle swept paths; public lighting; kerbside and temporary parking; visibility at crossings; positioning of bus stops; and boundary treatments.

16.8.19. On the one hand, it appears that many matters relating to the proposed scheme are to be addressed at detailed design stage. However, on the other hand, a project of this scale and nature would require certain details to be agreed before construction commences. Indeed, there may be certain works that could be carried out in any event under the Roads Acts.

16.8.20. Overall, I would be satisfied that CPO property drawings are sufficient to illustrate the extent of land requirements and the detail of the proposed scheme. As noted by TII, detailed property-specific matters are typically addressed at later stages through

mechanisms such as the detailed design phase, mitigation plans, and direct engagement with affected parties. I agree that the purpose of the planning application and EIA process is not to resolve every minor detail at this stage, but rather to assess the likely significant effects and overall environmental implications of the project taking into account the information presented with the application and in the EIAR. The appointed contractor will ensure dialogue between property owners and TII with respect to any accommodation works to be carried out. The Board should also note that such matters relating to access and boundaries will be appropriately dealt with as part of the detailed accommodation works plans in consultation with impacted landowners upon confirmation of CPO.

16.9. Other CPO Issues from Individual Submissions

Raven's Court

16.9.1. The residents of Raven's Court are objecting to the proximity of the Luas alignment to their estate and the loss of communal greenspace. The residents of No's. 1 & 12 will also lose some private garden space and there will be a reduction in car parking. There are safety concerns from residents egressing the estate into the pathway of the proposed Luas.

16.9.2. The western boundary wall of the estate will be built to a height of 2.25m and will be relocated 4m closer to residential properties, thereby reducing the amount of grass in the semi-private open space. Two trees would also be removed. The loss of green space in Raven's Court will be mitigated by a comprehensive landscaping plan for the estate to be agreed with residents at detailed design stage. The landscaping plan may include feature tree planting, evergreen flowering, street furniture and grasscrete.

16.9.3. A total of 3-4 unofficial parking spaces will be lost but the proposed scheme will not impact on existing residents' parking. A positive outcome would occur in that footpaths would not be obstructed. Manoeuvring space within the estate will remains

unchanged; emergency vehicles are given priority and there will be no safety issues associated with alternative options available to service vehicles.

16.9.4. TII recognise that the Luas crossing outside of the boundary to the estate, together with passing trams, will introduce an element of social and physical severance which has been assessed as significant, negative and long-term. This will be mitigated by slightly relocating the entrance to maximise visibility, and the provision of pathways. There will also be the standard suite of traffic signs, pavement markings and surface treatments to alert pedestrians leaving the estate of the presence of the Luas crossing. The outcome for residents of Raven's Court will also be mitigated by the provision of a new direct access through to the new Finglas Luas Station.

St. Margaret's Court

16.9.5. Issues are also raised by residents of St. Margaret's Court on parking and loss of greenspace. As noted by TII, the option chosen for St. Margaret's Court would allow improved accessibility to secure parking; enhanced green space and landscaping compared to the alternatives; and the number of car parking spaces will increase from 24 to 32.

16.9.6. I recognise that the residents of St. Margaret's Court facing onto St. Margaret's Road will be most affected by the proximity of the proposed scheme. However, the proposed solution, offering an overall increase in greenspace, new landscaping works and additional/relocated car parking appears to be the best outcome for all residents.

Colorman Site

16.9.7. One of the most affected properties will be the Colorman site in Broombridge Industrial Estate. The alignment of the new Luas bridge over the railway line and Royal Canal will be elevated over the southern and western sides of the Colorman site and land will be acquired to facilitate this arrangement.

16.9.8. TII notes in its response to the third party submission that permanent land take within Colorman's boundary is less than 7% and temporary land take is 7%, and this is not

considered to be significant. Access to the site will be maintained during construction and permanent access will be facilitated towards the end of the 18 month works programme at this location. It is submitted that there are alternative locations within the site that can be used for parking and the centrally located new access presents more opportunities than disadvantages for the future development capacity of the site.

16.9.9. Having regard to the above, I am satisfied that the impacts on the Colorman site can be mitigated to allow the business to continue to function at this location. Disruption can be kept to a minimum during construction and alternative arrangements can be put in place during the operational phase.

Fashionflo Site

16.9.10. Further to the north, it was requested that the elevated Luas line be continued so that access could be provided underneath to the Fashionflo site. I agree with TII that such a proposal would be excessive when alternative access to the premises can be provided. The volumes of traffic accessing this site are low and I note that TII will consider the provision of a wider gate opening at detailed design stage.

16.9.11. The objector responded to the applicant's submission by highlighting that the least worst option for accessing their site may not be deliverable as it appears to be reliant upon future planning applications outside of TII's control. It was therefore requested that the objector be afforded the opportunity to cross question TII before the Board.

16.9.12. As noted above, the Board decided that this case can be dealt with adequately through written procedure and without recourse to an oral hearing. The holding of hearings is a discretionary function of the Board and I am satisfied that extensive public consultation and stakeholder engagement was undertaken.

16.9.13. The objector requests that in the event that the Board is minded to confirm/ grant the Railway Order, the "emerging alternative solution" (in line with the proposals set out in Transport Insight's report) should be conditioned as part of the Railway Order,

rather than be subject to a separate planning application, the outcome of which is unknown.

16.9.14. TII had agreed that consideration can be given to providing a wider gate opening, at detail design stage, to increase the tolerance between the turning vehicle's swept path and the access gate. Following a meeting on 30th May 2025, Fashionflo indicated that the option of a larger HGV access and egress at Lagan Road, with loading/ unloading of vehicles accommodated in the north-east corner of the site, and materials transported via forklift trucks, or similar, to the warehouse in the southern part of the site would be the least worst option regarding impacts on the operation of the site. However, TII advised that it does not intend to seek planning permission for this option. The Board is requested by Fashionflo that all works associated with this option are included as part of the Railway Order. I agree that a condition should be attached reflecting same.

Brooks Site

16.9.15. Following the Board's invitation to respond to TII's submission of 27th March 2025, Brooks Timber and Building Supplies Ltd., confirmed that TII would examine an alternative access from Broombridge Road to assist traffic circulation on the Brooks site. It is requested that the Board should seek further information or attach a condition to the Railway Order in this regard.

16.9.16. I consider that an access to this site from Broombridge Road is acceptable having regard to the difficulties with the original proposals. I note that this access will impact on the 2-way cycle track and footpath on Broombridge Road. I would have concerns with this being a two-way access for HGVs and the ability of drivers to see oncoming pedestrians and cyclists, particularly when entering the site from Broombridge Road. Therefore, I proposed that a condition shall be attached to the Railway Order stating that the access on Broombridge Road shall be one-way for egressing HGVs only and shall not be used as a customer access for cars and LGVs.

Megrick Site

16.9.17. The further submission by Megrick Ltd. confirms in principle their support for Luas Finglas and satisfaction that matters raised in the previous the submission can be addressed through normal CPO procedures.

16.9.18. It is submitted that an LRD planning application on the main KSG site was submitted to Dublin City Council (WEBLRD6056/25-S3) on 1st May 2025. A different version of the TII link road and its junction with McKee Avenue, designed in consultation with Dublin City Council Roads Department, has been included in the LRD application. Megrick requests that the Board makes provision in the Railway Order that the alternative configuration of the TII link road can be agreed as part of the implementation of the Railway Order. I note, however, that this application has now been withdrawn.

Finglas Village Stop

16.9.19. Submissions were received from organisations currently operating around the proposed Finglas Village Stop. There are concerns about loss of parking, security and the ability of these organisations to continue operating. At this location, there are the Civic Offices, Finglas Youth Resource Centre, Finglas Counselling Service, Finglas Leisure Centre, and Mellow Spring Childcare Centre, as well as the fire station and Garda station.

16.9.20. The loss of parking will be partly compensated by new parking and temporary parking will be provided during construction. TII confirm that all organisations can continue to operation during construction. In my opinion, the proposed works at Finglas Village Stop will greatly benefit the area through provision of a pedestrian plaza and reduction in car dominance through the area. The additional footfall generated by the Luas stop will also lead to pedestrian activity and improved levels of security with more “eyes on the street”. The Luas can have the effect of creating a hub for this part of Finglas and a counterbalance to the historic village centre.

New Access from McKee Avenue

16.9.21. Owing to the alignment of Luas on St. Margaret's Road, a new access road is proposed from McKee Avenue. This will require the reorientation of certain businesses to address the newly proposed access to the rear, whilst the existing frontage onto St. Margaret's Road can continue to be used for pedestrians. TII confirms that access to these premises will be maintained throughout construction and alternative access will be provided prior to the existing access from St Margaret's Road being removed.

16.9.22. The proposed alternative access from McKee Avenue is in line with the masterplan for Jamestown. The masterplan includes measures to support existing uses while facilitating envisaged masterplan change in the area. TII agrees that the site-specific access solution from McKee Avenue is reviewed to minimise any potential impact, with its delivery sequenced ahead of closure of the St. Margaret's Road access.

16.10. CPO Conclusions

16.10.1. I am satisfied that the process and procedures undertaken by TII in seeking confirmation of the CPO have been fair and reasonable, that TII has demonstrated the need for the lands and that all the lands being acquired are both necessary and suitable to facilitate the provision of Luas Finglas.

16.10.2. Having regard to the constitutional and Convention protection afforded to property rights, I consider that the acquisition of lands and restriction/ interference with public rights of way, and the acquisition/ restriction of private rights of way as set out in the compulsory purchase order and on the deposited maps pursues, and is rationally connected to, a legitimate objective in the public interest, namely the development of Luas Finglas.

16.10.3. I am also satisfied that the acquiring authority has demonstrated that the means chosen to achieve that objective impair the property rights of affected landowners as little as possible; in this respect, I have considered alternative means of achieving the objective referred to in submissions to the Board, and am satisfied that the

acquiring authority has established that none of the alternatives are such as to render the means chosen and the CPO made by the acquiring authority unreasonable or disproportionate.

16.10.4. The effects of the CPO on the rights of affected landowners are proportionate to the objective being pursued. I am further satisfied that the proposed acquisition of lands and restriction/ interference with public rights of way, and the acquisition/ restriction of private rights of way would be consistent with the policies and objectives of the Dublin City Development Plan 2022-2028 and the Fingal County Development Plan, 2023-2029. Accordingly, I am satisfied that that the confirmation of the CPO is clearly justified by the exigencies of the common good.

17.0 Conditions Assessment

17.1. It is noted that several parties including the planning authorities, prescribed bodies, observers and objectors seek the imposition of conditions should the Board be minded to approve the Railway Order and confirm the Compulsory Purchase Order. The Board should note that the conditions do not raise any significant issues in relation to the principle of the proposed development and were largely focused on detailed design and service issues.

Conditions Requested by the Planning Authorities

17.2. Dublin City Council propose a total of 65 planning conditions on matters regarding liaison between TII and DCC; handover; existing condition record; roads design & construction; reinstatement and maintenance; construction period; air quality; noise and vibration; community engagement and notification procedures; out of hours work notification; operational phase; drainage and water protection; and public lighting. A further 14 conditions were recommended by the City Architect's Division, as well as those from the Conservation Section.

17.3. Many of the conditions that Dublin City Council has requested are seeking to implement the presented design or mitigation measures already proposed by the

applicant as part of the Railway Order application. They are also covered by the general conditions which the Board typically applies, e.g. Condition 2, which seeks to implement measures proposed in the EIAR, NIS and any associated documents will ensure the appropriate management of the construction phase and render the attachment of such conditions unnecessary. Other conditions relate to matters that will be covered at detailed design stage, e.g. street furniture, materials palette, bus stop layout, tactile paving, etc.

17.4. I agree that conditions should be attached relating to the requirement for accessibility auditing, road safety auditing, conservation method statements, and taking in charge. Dublin City Council also recommend the attachment of a condition stating that the new access road through Jamestown Industrial Estate to serve existing businesses along St. Margaret's Road shall be designed to include pedestrian and cyclist priority, including crossings in line with the requirements of the Jamestown Masterplan. I agree that this should be included as a condition of the Railway Order for clarity.

17.5. A total of 11 conditions are recommended by Fingal County Council, including those relating to landscaping, construction management, C&D waste management, water supply and surface water management, hours of construction, noise control, spillages, undergrounding of services, financial contributions and community gain. I consider that the issues concerning these conditions are captured within mitigation measures, detailed design or the recommended conditions.

<u>Conditions Recommended by Prescribed Bodies</u>

17.6. The Development Applications Unit, Department of Housing, Local Government and Heritage recommends the attachment of conditions relating to archaeology, and a condition that all mitigation measures to avoid adverse effects on flora, fauna and important habitats shall be implemented in their entirety. Conditions reflecting same are attached (Section 22).

17.7. The NTA states that the design should reflect the requirements of the NTA's Cycle Design Manual, particularly in relation to the width of some links and the continuity

between sections. It is proposed to attach a condition stating that all junctions shall be designed in accordance with the detailed standards set out in DMURS and the Cycle Design Manual, 2023.

17.8. Uisce Éireann recommend that temporary connections agreements for water for construction compounds should be addressed by way of condition. I consider that this is not necessary. The applicant has consulted extensively with the Uisce Éireann and will be required to further engage during construction phase.

Conditions Requested by Owners/ Occupiers

17.9. Certain individual owner/occupiers have sought specific conditions in respect of their properties relating to matters of access, extent of land take, amenities, completion of works, etc. I do not consider such bespoke conditions are necessary in all cases. However, locations where I consider that a condition addressing a certain issue is necessary are at Brooks Timber and Building Supplies, and Fashionflo Ltd. I am of the view that a condition in these situations can provide clarity and a degree of certainty to the property owners/ occupiers.

18.0 Overall Conclusion

18.1. There is a consistent message throughout all levels of policy that there must be a transition to a low carbon and climate resilient society. This requires a reduction in car dependency to contribute towards lower energy consumption, CO_2 levels and pollutant emissions. Sustainable mobility, compact growth and land use and transportation integration are essential for the creation of sustainable communities that minimise private car use, prioritise cycling, walking and public transport and promote the efficient use of land.

18.2. Luas Finglas comprises a 3.9km extension to the existing Luas Green Line with four tram stops at St. Helena's, Finglas Village, St. Margaret's and Charlestown. New tram stabling facilities are proposed at the existing Broombridge terminus and a park and ride will be situated in proximity to the St. Margaret's stop. The tram extension

will form a critical element for Transport Orientated Development taking place at Jamestown and Ballyboggan in the coming years. There are also significant existing catchments at each of the proposed tram stops, including those covering disadvantaged areas to the west of Finglas. Luas Finglas is expected to carried 1.3 million passengers by 2035, rising to 1.8 million in 2050.

18.3. The benefits of the proposed scheme will also extend to pedestrians and cyclists through extensive active travel measures and public realm improvements. Tram stops will form new hubs for the local community and there will be significant improvements to the street environment along the route. Passive surveillance brought about by passing trams and the associated extra footfall will also help to make the corridor feel safer. Increased animation along green spaces forming part of the corridor will outweigh the linear intrusion and severing of these areas. Grass tracks will also help to integrate the line into the green surroundings.

18.4. I have some concerns regarding the disjointed nature of cycle infrastructure along the corridor. I acknowledge that cycle infrastructure provision in the area will be implemented by other bodies under the Cycle Network Plan. However, there is an opportunity the provide segregated cycle tracks along what would be considered a desire line. Better cycle connections also result in more activity along the route. I recommend the attachment of a condition to requiring the applicant to prepare a cycle strategy for the route. This should address gaps in the corridor, junction design, cycle track widths and access to the park and ride. I also recommend that a public realm strategy should be prepared for the area around St. Helena's and Farnham pitches. This should include consideration of shared surfacing along St. Helena's Road, continuation/ relocation of cycle track and better north/ south connections.

18.5. The proposed scheme will result in adverse impacts on residents and businesses particularly in the construction phase, but also during the operational phase for certain parties. Access arrangements, parking and internal business operations will be affected and this can only be mitigated through provision of new accesses,

replacement boundaries and monetary compensation. On balance, however, residents and businesses in proximity to the line will benefit from having access to high quality public transport.

18.6. My overall conclusion is that the Railway Order application for the proposed scheme should be granted. I have assessed the impacts of the proposed scheme on properties aligning the route that will be most affected and my conclusion is that there is a community need that is to be met by the acquisition of the parcels of land in question; the parcels of land to be acquired are suitable and proportionate to meet that community need; alternative methods of meeting community need have been considered but are not demonstrably preferable; and works to be carried out accord with or at least are not in material contravention of the provisions of the statutory Development Plans.

19.0 Recommendation

I recommend that the application under Section 37 of the Transport (Railway Infrastructure) Act 2001 (as amended and substituted) for Luas Finglas should be **granted** for the reasons and considerations below and subject to the following conditions.

20.0 Reasons and Considerations

In performing its functions in relation to the making of its decision, the Board had regard to:

(a) Section 15(1) of the Climate Action and Low Carbon Development Act 2015, as amended by Section 17 of the Climate Action and Low Carbon Development (Amendment) Act 2021, and the requirement to, in so far as practicable, perform its functions in a manner consistent with Climate Action Plan 2024 and Climate Action Plan 2025 and the national long term climate action strategy, national adaptation framework and approved sectoral adaptation plans set out in those

Plans and in furtherance of the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State).

(b) Directive 2000/60/EC, the Water Framework Directive and the requirement to exercise its functions in a manner which is consistent with the provisions of the Directive, and which achieves or promotes compliance with the requirements of the Directive.

In coming to its decision, the Board also had regard to the following:

a) EU legislation including in particular:

- The relevant provisions of **EU Directive 2014/52/EU** amending **Directive 2011/92/EU (EIA Directive)** on the assessment of the effects of certain public and private projects on the environment,
- **Directive 92/43/EEC (Habitats Directive) and Directive 79/409/EEC as amended by 2009/147/EC (Birds Directives)** which set out the requirements for Conservation of Natural Habitats and of Wild Fauna and Flora throughout the European Union.
- **Sustainable and Smart Mobility Strategy 2020 (EU Commission 2020)**

b) National Policy and Guidance including in particular:

- **Project Ireland 2040 encompassing the National Planning Framework and the National Development Plan.**
- **Climate Action Plan, 2024 / 2025**

c) Regional Policy including in particular:

- **The Transport Strategy for the Greater Dublin Area 2022-2042.**
- **Eastern & Midlands Regional Spatial & Economic Strategy, 2019-2031.**

d) Local Planning Policy including in particular:

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

- **The Fingal County Development Plan 2023-2029**

e) Other relevant guidance documents

f) The following matters:

- the nature, scale and design of the proposed development as set out in the planning application and the characteristics and pattern of development along the railway corridor and in the vicinity,
- the documentation and submissions of Transport Infrastructure Ireland (applicant), including the environmental impact assessment report and associated documentation submitted with the application, 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 compulsory acquisition.

It is considered that the proposed scheme 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.

21.0 Environment Impact Assessment

(i) The Commission completed an Environmental Impact Assessment of the proposed development taking into account:

(ii) the nature, scale and extent of the proposed development,

(iii) the Environmental Impact Assessment Report and associated documentation submitted in support of the application,

(iv) the submissions made in the course of the application; and

(v) 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 application.

The Board considered, and agreed with the inspector's reasoned conclusions, that the main significant direct and indirect effects of the proposed development on the environment are as follows:

- Positive long term impacts on **population and human health** through facilitation of improved pedestrian and cyclist safety, faster and more reliable public transport services, reduced traffic congestion, improved air quality and noise reduction, improved road/ street safety, more social interaction and positive accessibility and amenity impacts for community areas.
- Adverse short-term impacts on **population and human health** from the construction phase in terms of access restrictions, noise, vibration, dust, contaminated material, traffic and visual impact. This will be adequately mitigated through compliance with the CEMP and measures outlined in the Land, Soils, Water, Air and Climate and Material Assets sections of the EIAR.

- Adverse long-term impacts on **population and human health** from the temporary and permanent acquisition of land. This will be adequately mitigated through provision of new accesses, replacement boundaries and monetary compensation.
- Neutral to slight impacts on **Biodiversity** in terms of direct habitat loss and fragmentation; physical degradation of habitats; disturbance and displacement of protected faunal species (visual and audible); pollution of surface and groundwater networks; air (dust) pollution; and spread of invasive non-native species. Mitigation will nonetheless be implemented to protect water quality through works scheduling, invasive species management, measures to mitigate against the release of suspended solids, fuels and oils, and cements, and measures to minimise disturbance to protected species.
- Beneficial cumulative impact of the proposed Luas Finglas scheme on **Climate** during the operational phase due to the overall reduction in road traffic GHG emissions.
- Adverse impacts on **Land** through acquisition of properties on a temporary basis; acquisition of properties on a permanent basis; and demolition of structures, including boundary walls / fencing. Impacts have been minimised through careful consideration of alternatives and owners will be entitled to submit a claim for compensation where land and property is necessary in order to ensure the delivery of the proposed scheme in its entirety.
- Potential impacts on **Water** during construction from runoff and watercourse disturbance. A Surface Water Management Plan and CEMP have been developed to detail the control and management measures for avoiding, preventing, or reducing any significant adverse impacts on the surface water environment.
- Potential impact on **air quality** during the construction phase is from construction dust emissions and nuisance dust deposition. Appropriate construction dust mitigation measures have been outlined for the construction phase in the CEMP.

- Potential for construction and operational **noise and vibration** impacts. Following mitigation, there will be moderate to significant impacts for brief periods when works are immediately adjacent to sensitive properties.
- Potential for slight to moderate adverse impacts on **Material Assets (Utilities and Infrastructure)** during the construction phase through diversion/ interruption of services that will be mitigated through prior notification given to all the impacted property owners and precautions will be implemented to protect the infrastructure from damage, including localised confirmatory surveys.
- Potential for significant positive impacts on **Material Assets (Traffic & Transport)** during the operational phase from improvements for walking, cycling, public transport and people movements, and reductions in general traffic and associated GHG emissions.
- Potential for moderate to significant impacts on **Landscape and Visual Amenity** through the introduction of an uncharacteristic new element or feature that would lead to an overall change in landscape character and quality of the Royal Canal and Tolka Valley Park Local Landscape Character Areas. The overall residual impact on landscape character and visual amenities will be positive as the proposed scheme becomes increasingly integrated within its setting.

The Board completed an environmental impact assessment in relation to the proposed development and concluded that, subject to the implementation of the mitigation measures set out in the Environmental Impact Assessment Report, and subject to compliance with the conditions set out below, the effects on the environment of the proposed development, by itself and in combination with other development in the vicinity, would be acceptable. In doing so, the Board adopted the report and conclusions of the inspector.

22.0 **Appropriate Assessment**

The Board agreed with and adopted the screening assessment and conclusion carried out in the inspector's report that the South Dublin Bay SAC, North Dublin Bay SAC, Rockabill to Dalkey Islands SAC, North Bull Island SPA, South Dublin Bay and River Tolka Estuary SPA, and North West Irish Sea SPA are the European sites for which there is a likelihood of significant effects.

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 South Dublin Bay SAC, North Dublin Bay SAC, Rockabill to Dalkey Islands SAC, North Bull Island SPA, South Dublin Bay and River Tolka Estuary SPA, and North West Irish Sea SPA, 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.

23.0 **Proper Planning and Sustainable Development**

The proposed scheme would deliver a key component for achieving the policy objectives of the National Planning Framework and will enable delivery of compact sustainable growth in Dublin City. 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 tram corridor would also be improved. The Board considered that the proposed scheme, 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 scheme has been adequately demonstrated, that it is acceptable in terms of its likely effects on the environment and that an approval for the proposed scheme would be consistent with national climate ambitions and with the relevant provisions of the Climate Action Plan 2024 / 2025 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 scheme would, therefore, be in accordance with the proper planning and sustainable development of the area.

24.0 **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 and the proper planning and sustainable development of the area and to ensure the protection of the environment.

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. The proposed development shall be amended as follows:

   (a) A cycle strategy shall be carried out of the existing and proposed cycling environment along the corridor with conclusions, recommendations and detailed designs for protected junctions; continuous cycle track provision; proposals to integrate with greenways; and proposals for cycle access to the park and ride facility along North Road.

   (b) A public realm strategy shall be carried out of the existing and proposed environment around St. Helena's stop and Farham pitches, with conclusions, recommendations and detailed designs for shared surfacing on St. Helena's Road; pedestrian and cyclist desire lines; continuation of cycle infrastructure to the north; and better north/ south connection for active travel.

   (c) All junctions shall be designed in accordance with the detailed standards set out in DMURS and the Cycle Design Manual, 2023.

(d) Pinch points shall be in line with the road user hierarchy as designated within DMURS, i.e., the width of the general traffic lanes should reduce first, then the width of the cycle track should be reduced before the width of the pedestrian footpath is reduced. Footpaths and cycle lanes shall not be reduced below 2m where there is scope to reduce the adjoining general traffic lane to 2.75m.

Revised drawings showing compliance with these requirements shall be submitted to the planning authorities for written agreement before commencement of development.

Reason: In the interests of pedestrian and cyclist safety and convenience.

4. Prior to commencement of development, a Safety and Accessibility Audit shall be agreed in writing with the local authorities for locations where pedestrians and cyclists will share surfaces.

Reasons: In the interests of pedestrian and cyclist safety.

5. Option 5 – Larger access at Lagan Road, as presented at the meeting of 30th May 2025 between TII and Fashionflo Ltd., and as set out in the report of 10th June 2025 prepared by Transport Insights accompanying Fashionflo's submission following the Board's invitation to respond to TII's submission of 27th March 2025, shall form the basis for accessing the Fashionflo Ltd. site. Revised drawings showing compliance with these requirements shall be submitted to the planning authority for written agreement before commencement of development.

Reason: In the interests of clarity.

6. The proposed access to the Brooks Timber and Building Supplies Ltd. site from Broombridge Road as presented in the observer's submission following the Board's invitation to respond to TII's submission of 27th March 2025, shall be one-way for egressing HGVs only. Revised drawings showing compliance with these requirements shall be submitted to the

planning authority for written agreement before commencement of development.

Reason: In the interest of clarity and pedestrian and cyclist safety.

7. The new access road through Jamestown Industrial Estate to serve existing businesses along St. Margaret's Road shall be designed to include pedestrian and cyclist priority, including crossings in line with the requirements of the Jamestown Masterplan.

   Reason: In the interests of clarity and for pedestrian and cyclist safety.

8. Prior to the commencement of development, the developer, and/or any agent acting on its behalf, shall prepare in consultation with the relevant statutory agencies, a 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, surface water management proposals and interactions with Iarnród Éireann interfaces. The construction of the development shall be constructed in accordance with the updated CEMP.

   Reason: In the interest of protecting the environment, the landscape, European sites, and sensitive receptors and in the interest of public health.

9. 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 Construction Traffic Management Plan shall include identification of mitigation measures to protect operational Luas infrastructure. 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.

10. . Prior to the commencement of development, details of measures to protect fisheries and water quality of the river systems shall be outlined and placed on file. Full regard shall be had to Inland Fisheries Ireland's published guidelines for construction works near waterways (Guidelines on Protection of Fisheries during Construction Works in and Adjacent to Waters, 2016). A programme of water quality monitoring shall be prepared in consultation with the contractor, the local authority and relevant statutory agencies and the programme shall be implemented thereafter.

. **Reason:** In the interest of the protecting of receiving water quality, fisheries and aquatic habitats.

11. . 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 15-39 (Construction Noise Threshold (CNT) levels for the proposed scheme) of Chapter 15 (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 interests of management of construction noise and protection of adjoining amenities.

12. Drainage arrangements, including the attenuation and disposal of surface water, shall comply with the requirements of the planning authority for such works in respect of both the construction and operation phases of the proposed development.

    Reason: In the interest of environmental protection and public health.

13. 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 (Transport Infrastructure Ireland) 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 be undertaken by specialists. Monitoring schedules shall be included in Site Specific Habitats Protection and Re-instatement Method Statements.

    Reason: In the interests of environmental protection.

14. Prior to the commencement of development at each section of the proposed works, pre-construction surveys shall be carried out to determine the presence of protected mammal, bird or bat species.

    Reason: In the interest of environmental protection.

15. (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 TII 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 during the bird breeding season, unless otherwise agreed with the planning authorities.

Reason: In the interest of wildlife protection.

16. Prior to the replacement of trees, hedging and planting which is to be removed, TII shall liaise with the relevant landowner with regard to the species, size and location of all replacement vegetation. Tree protection measures for all existing trees shall be put in place prior to commencement of development or phases of development and all details of soft landscaping shall be submitted to the planning authority for agreement prior to implementation. TII shall also employ the services of an appropriately qualitied 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.

17. 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.

18. Prior to the commencement of development, the developer and/or any agent acting on its behalf shall submit an Invasive Species Management Plan to the local 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 interest of nature conservation and mitigating ecological damage associated with the development.

19. All works to Protected Structures, and structures of cultural heritage interest shall be monitored and recorded by an Architectural Conservation Specialist, and Conservation 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 Sections of Local Authorities as soon as is practicably possible.

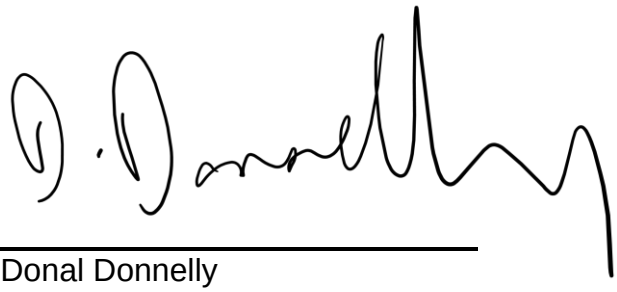
    Reason: In order to protect the architectural heritage of the corridor and immediate surroundings.

20. . The developer and/or any agent acting on its behalf shall facilitate the preservation, recording, protection or removal of archaeological materials or features that may exist within the site. A suitably qualified archaeologist shall be appointed by the developer to oversee the site set-up and construction of the proposed development and the archaeologist shall be present on site during construction works. Should archaeological material be found, the archaeologist may have work stopped and the developer shall carry out the necessary mitigation/ recording. The Planning Authority and Department of Housing, Local Government and Heritage shall be furnished with a report describing results of monitoring.

    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.

21. . Prior to commencement of development, a comprehensive agreement shall be put in place and agreed in writing between TII and the local authorities on the procedures for the handing over and handing back of the tram corridor and taking in charge arrangements.

. **Reason:** In the interests of orderly development.



. Donal Donnelly
Senior Planning Inspector

. 22nd September 2025

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.