

An  
Bord  
Pleanála

## Memorandum ABP-316828-23

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**To:** Board  
**From:** Donal Donnelly, Senior Planning Inspector  
**Re:** Oral Hearing Recommendation for application under Section 51(2) of the Roads Act 1993 Application no. ABP-316828-23  
**Date:** 11<sup>th</sup> January 2024

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### Introduction

The National Transport Authority have made an application under Section 51 (2) of the Roads Act 1993 as amended, for approval in relation to a proposed road development scheme. The proposed scheme is 1 of 12 no. bus corridor schemes under the BusConnects programme and is accompanied by a Compulsory Purchase Order reference ABP 317070-23 for which there is a separate Oral Hearing recommendation.

### Description of Development Location

The proposed scheme submitted under this application is for the construction of the Tallaght / Clondalkin to City Centre Core Bus Corridor (CBC), over a length of approximately 15.5km and comprising the Tallaght to City Centre section and the Clondalkin to Drimnagh branch. There is also a branch from Drimnagh to the Grand Canal proposed for cycle infrastructure.

The Tallaght to City Centre section commences at the junction of Blessington Road/ Cookstown Way and proceeds through Tallaght Village and onto Greenhills Road (R819). The CBC splits at two locations to form a new alignment along the green strip to the west of Parkview, and also to the north M50 to form a new connection to

Ballymount Avenue. The section of Greenhills Road to the north of the new junction with Ballymount Avenue will be downgraded to a local road and a cul de sac will be formed at its northern end. At Walkinstown Roundabout, the CBC proceeds in two directions along Walkinstown Road for buses and Bunting Road for bicycles, before joining Long Mile Road/ Drimnagh Road (R110).

Eastbound, the Clondalkin branch of the CBC commences at Nangor Road (R134) and continues through the major intersection at Fox-and-Geese Common where Nangor Road and Long Mile Road meet the Naas Road. The Drimnagh to Grand Canal branch commences at the junction to the south of Our Lady's Childrens Hospital, Crumlin and proceeds to the north-eastern end of Clogher Road, where the proposed scheme ties in with the Grand Canal Safety Improvement Scheme.

From Drimnagh to the City Centre, the CBC continues along Crumlin Road and over the Grand Canal at Dolphins Barn and past The Coombe Hospital. The route approaches the city centre along Cork Street and St. Luke's Avenue, then onto Dean Street. The final section is along Patrick Street and Nicholas Street (R137), where the proposed scheme meets High Street and the termination point of the Liffey Valley to City Centre CBC.

Key improvements include:

- The number of pedestrian signal crossings will increase by 34% from 135 to 181 as a result of the proposed scheme;
- The proportion of segregated cycle facilities will increase from 17.2% on the existing corridor to 93% on the proposed scheme (including offline cycling facility length);
- The proportion of the route having bus priority measures will increase from 34% on the existing corridor to 94% on the proposed scheme.

Specific works proposed within the development include the following:

- 29.2 km (two-way) of bus priority infrastructure and traffic management.
- 38.5km (total both directions) of cycling infrastructure and facilities.

- Provision of new / refurbished pedestrian facilities and footpaths along the scheme and associated ancillary works.
- Replacement of roundabouts with signalised junctions and provision of raised table side entry facilities at minor junctions.
- Provision of enhanced cycling infrastructure to include segregated cycle tracks wherever practicable, limited cycle lane provision, quiet street treatment and safer junction design, with priority for sustainable modes.
- Enhanced bus priority through provision of bus lanes, signal-controlled priority and bus gates.
- Reconfiguration of existing bus stops to include island bus stops, shared landing area bus stops, inline bus stops, and layby bus stops, as well as enhanced bus stop facilities.
- Enhanced interchange opportunities with existing and proposed public transport networks and other infrastructure projects.
- Changes to parking and loading provisions.
- Public realm works including landscaping, planting, street furniture, street lighting, retaining walls, boundary walls, and sustainable urban drainage measures.
- Roads associated earthworks including excavation of material, importation of material and temporary storage of materials.
- Provision of road pavement, signing, lining and ancillary works.
- Construction of accommodation works including boundary treatment and ancillary grading and landscaping works together with all ancillary and consequential works associated there with.

The construction phase for the proposed scheme is anticipated to take approximately 36 months. It will be constructed based on sectional completions that will individually have shorter durations typically ranging between two weeks and 10 months. There will be 250 to 270 rising to 300 workers on the scheme at peak construction.

### **Environmental Impact Assessment**

The NTA has submitted an Environmental Impact Assessment Report (EIAR) to the Board prepared in accordance with section 50 of the Roads Act 1993 (as amended)

and Directive 2011/92/EU of the European Parliament and Council, 2011, as amended by Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014 in respect of the proposed road development.

### **Appropriate Assessment**

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

### **Third Party Observations**

A total of 55 no. third party submissions have been received by the Board and these are summarised within Appendix 1 of this memo. An oral hearing was requested within three of these submissions.

Many of the issues raised within submissions are common to all of the submissions. For example, a number of submissions raise concerns about the impact of the proposed bus lanes through green space at Parkview, Kilnamanagh. Other observers consider that proposed construction compounds are inappropriately placed and that the proposed pedestrian bridges at Naas Road/ Long Mile Road/ Nangor Road junction are unnecessary. Potential impacts on public open space are highlighted and some businesses are concerned at the downgrading of a section of Greenhills Road to a local road.

### **Prescribed / Public Bodies**

Submissions have been received from 4 no. prescribed/ public bodies and these are summarised hereunder. Submissions are generally in support of the proposed development and do not raise any significant issues in relation to the EIAR or NIS submitted.

#### **1. Department of Housing, Local Government and Heritage**

- Main concern from a nature conservation perspective is the potential adverse effects which may result to calcicole plant communities present on the R819 Greenhills Road.

- Scrub vegetation along the proposed CBC scheme are likely to support breeding birds in season.
- Conditions recommended on archaeological mitigation.

## **2. South Dublin County Council**

- Generally in favour of the principle of the proposed scheme and sets out related policy.
- Proposed scheme will support more efficient and intensive use of brownfield serviced urban sites, sustainable and vibrant communities, as well as housing delivery.
- Proposed scheme will provide a good balance between servicing existing communities while not seriously and adversely affecting residential amenities, given its proposed routing.
- Proposed scheme is delivering on wider remit of smarter travel and outweighs issues such as loss of trees and carriageway width dedicated to cars.
- Bus Interchange / tie-in with SDCC public plaza.
- Bancroft Park compound requirements.
- Old Greenhills Road Plaza concerns / enhanced public realm.
- Cycle lanes to connect into existing cycle lanes.
- Various queries in the Mayberry Road / Birchview Avenue / Treepark Road / Castletymon Road.
- Provide high-quality open spaces.
- Site compound requiring planning condition for agreement with Local Authority.
- Pedestrian and cycle linkages welcomed.
- Various queries regarding green space / design between Calmount Road and existing Greenhills Road.
- Naas Rd/Long Mile Road junction requires uplift in design pedestrian/ cycle bridge.

- Public realm and maintenance implications for Local Authority require clarity.
- Detailed CEMP necessary / departmental recommendations.

### **3. Dublin City Council**

- Delivery of improved high-capacity Core Bus Corridors will enable and support residential and economic development opportunities.
- Considered that the proposals would be compatible and consistent with the zoning objectives for the area.
- Satisfied that elements of the proposed development falling within the Council boundary would not have any excessive or undue impact on the amenities of the area.
- The need for sharing kerbside space will need to be managed so that there is no undue adverse impact for residents and visitors to access local services on foot or on the ability to achieve the '15-minute city'.
- Site compounds to be appropriately reinstated.
- Design of public realm fundamental to success of proposed scheme.
- Design should be supported by pedestrian traffic counts.
- All historic fabric and features should be retained and protected.
- General arrangement drawings do not include an overlay of existing survey drawings – would have facilitated a better assessment of the proposal on existing public realm.
- Land acquisition and Taking in Charge.
- Confirmation sought whether these lands will be transferred to Local Authority.
- Numerous design, land and maintenance queries.
- Percent for art strategy queried.
- Suitable locations for water drinking fountains should be identified.
- New trees should only be indicated where sufficient footpath width for pedestrians and wheelchair users.

- Number of traffic signal poles needs to be rationalised.
- Gantry signage is not suitable in low speed residential areas / conservation areas.
- Existing village signage should be retained / co-ordinated.
- Planning Authority requests that the scheme be approved subject to conditions relating to the handing over of the corridor to the NTA and its contractors and handing back to the Council; consultation with Council departments; archaeology; details of landscaping, public realm, bus shelter design, utility cabinets and electrical charging points; design, materials and boundary treatments; public art and water drinking fountains; landscape maintenance and tree protection; signage; conservation supervision and details relating to specific items; traffic management equipment; photographic record; final design details; road safety audits; universal design principles; agreement of alteration of kerbside spaces; reinstatement; construction period; public lighting; drainage, flooding and water protection; noise and air quality control; and development contributions.

#### **4. Transport Infrastructure Ireland**

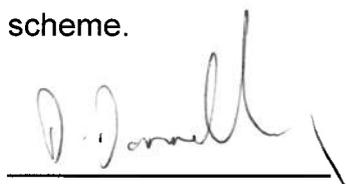
- Acknowledges and supports that the BusConnects project is a key part of the Government's policy to improve public transport and address climate change.
- Proposed scheme interacts with the national road network and Luas at four locations - BusConnects must be able to proceed complementary to the protection of the safe and efficient operation of the national road network in the interests of effective integration of sustainable and active travel modality.
- National roads / light rail not considered separately in EIAR.
- Detailed CTMP required, including mitigation measures.
- Interactions, mitigations and recommendations for national roads and light rail.

## Recommendation

I have examined all of the submissions received, the NTA's response to the submissions and all of the documentation submitted with the application and I have considered all of the foregoing in relation to the Oral Hearing checklist which is appended to this memo within Appendix 2. The information provided within both the application documentation and the response to the submissions provides detailed information pertaining to the proposed works and how such works will affect individual properties, the wider environment and the functionality of the road space in terms of traffic volumes, speed, carrying capacity and all other issues relating to a multimodal road scheme.

I am satisfied that the information submitted is of sufficient detail to allow for a full and proper assessment of the case. I therefore consider that the proposed development can be adequately assessed without recourse to an Oral Hearing.

In the absence of an Oral Hearing being held, I consider it prudent to permit a final round of circulation in relation to the applicants' responses to the submissions received. This response document addresses each submission individually in detail, and given the level of information provided within it, I consider it important to provide third parties with an opportunity to consider the NTA's responses and submit further written comments if deemed necessary. The Board may also consider it appropriate to seek further information from the applicant on certain aspects of the proposed scheme.



**Donal Donnelly**

**Inspectorate**

**11<sup>th</sup> January 2024**

*noted + agreed*  
*Stephen King*  
*12.1.2024*

## Appendix 1 – Summary of Issues Raised in Submissions

### 1. Bancroft Park (17 no. submissions referencing this location)

*Key Issues: (Impact of construction compound on green space)*

- Visual impact
- Loss of public green space
- Impact on character of area
- Impacts on biodiversity
- Safety of vulnerable pedestrians
- Air, noise, dust, light pollution
- Community care and recreational premises
- Property values
- Alternative locations
- Lack of consultation
- Drainage
- Loss of educational resource
- Noise impacts on students

### 2. Tallaght Village (7 no. submissions referencing this location)

*Key Issues:*

- Archaeological and cultural heritage
- Loss of community plaza
- Alternative route available, e.g. through TUD Tallaght
- Loss of on-street parking
- Loss of cul-de-sac at Old Greenhills Road and traffic congestion

### 3. Parkview (14 no. submissions referencing this location)

*Key Issues:*

- Loss of green space
- Environmental impacts
- Safety of children / students / residents with extra lanes to cross
- Loss of privacy from passing buses
- Access to amenities
- Lack of consultation
- Unnecessary change providing no real gains to bus travel times

- Property values
4. Greenhills Road (5 no. submissions referencing this location)
- Key Issues:*
- Negative effect on businesses
  - Traffic and access
  - Security concerns with proposed cul-de-sac of Greenhills Road
  - Lack of consultation
  - Property values and future development
  - Alternative proposal
  - Bus stops and future bus routes
  - CPO of land
  - Mitigation measures
  - Zoning
5. Bunting Road/ Kildare Road/ Old County Road/ Clonard Road/ Bangor Drive/ Saul Road (7 no. submissions referencing this location)
- Key Issues:*
- Increased traffic congestion and additional traffic on surrounding roads leading to noise & air pollution
  - Safety concerns for traffic diversions onto residential roads leading to danger to children playing, and walking / cycling
  - Loss of street parking
  - Tree replacement unacceptable
  - Bus time improvement not justified
  - Quiet Road signage and enforcement of bus gate unclear
  - Removal of existing bus stops on Clogher Road
  - Construction traffic
  - Lack of community engagement
  - Disagree with EIAR statement of minimal impact on community
  - Combined effect of schemes
  - Request for mitigation
  - Bunting Road cycle route
  - Proposed Construction Compound at Bunting Park impacting on pitch

6. Naas Road / Long Mile Road Junction (2 no. submissions referencing this location)

*Key Issues:*

- Unlikely proposed pedestrian/ cycle bridge would be used as intended
- Reduced visibility of businesses and visual amenity
- Safety concerns of proposed ramp close to petrol station
- Clarification required for proposed land take
- Loading/ unloading access
- Visibility of property
- Vandalism / litter / anti-social / damage
- Access / egress and timescale of works
- Lack of information justifying proposed bridges

7. Walkinstown Roundabout (1 no. submission)

*Key Issues:*

- Surplus land acquisition / lack of clarity regarding scheme impacts
- Drainage / access concerns
- Works may affect property / parking
- Impact on business
- Loss of approach lane at roundabout arms

8. Walkinstown Road (1 no. submission)

*Key Issues:*

- Safety of children/ reinstatement of boundary/ gates
- Property access
- Health of residents / noise & dust concerns
- Property value concern / quality of life affected by works

9. New Nangor Road (1 no. submission)

*Key Issues:*

- Site security
- Proposed tree types will sterilise parking lot
- Proposed hedgerow outside scheme extents
- Access to lands required at all times

10. Dolphins Barn (1 no. submission)

*Key Issues:*

- Request loading bay for retail and commercial premises (Tesco)

11. Rafter's Road (1 no. submission)

*Key Issues:*

- Loss of green space negative impact on community
- Property values / scheme will not bring positive change to Crumlin area
- Suggest use of green area as bike depot
- Mature trees help offset traffic emissions

12. Calmount Road / Ballymount Avenue (1 no. submission)

*Key Issues:*

- Concern scheme will impact on operational performance of junction
- Suggest design amendment at junction to facilitate adjacent development

13. Calmount Business Park (1 no. submission)

*Key Issues:*

- Widening of Greenhills Road not considered
- City Edge project not properly engaged/ considered
- Land use not considered in EIAR
- Significant impact on Calmount Business Park during construction & operation
- Impact on future development
- Scheme premature and does not consider alternatives

14. Other Key Issues:

- No account of traffic outside rush hours
- Traffic modelling out of date (Covid)
- Public consultation Aarhus compliance
- Bus passengers disembarking onto cycle lane
- Bus lane enforcement cameras
- Access to Lidl store
- Cycle track width and continuity

- Speed limits
- Cost benefit disproportionate
- Carbon emissions
- Plan based on all journeys going to city centre
- Minimal journey time savings
- Metro alternative should be considered
- Consideration of City Edge development
- Expedite Bunting Road proposals

## Appendix 2

### Oral Hearing Recommendation – Bus Connects Project

File Refs: ABP -316828-23

Project Title Tallaght Clondalkin City Centre Core Bus Corridor

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In light of the application documentation, third party observations and response submissions received from the applicant:

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|---|----|
| 1. Is there a lack of clarity or detail in the information available that would require a hearing ?                     | No |
| 2. Are there outstanding issues relating to the design approach or alternatives such as would merit a hearing ?         | No |
| 3. Are the number of submissions / complexity of issues raised in submissions such as to require a hearing ?            | No |
| 4. Are there outstanding issues relating to the justification / need for the project that would require a hearing ?     | No |
| 5. Are the nature and extent of impacts on third party properties uncertain or otherwise such as to justify a hearing ? | No |

### **Recommendation**

Having regard to the above and as per the attached memo I –

- Recommend no oral hearing be held.

I recommend that the response submission received from the first party be circulated to all other parties for comment.

Senior Planning Inspector

Donal Donnelly



Assistant Director of Planning

Stephen Kay

