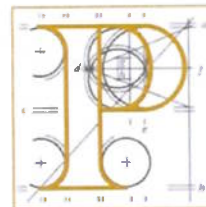


Our Case Number: ABP-317121-23



**An
Bord
Pleanála**

Carmel Sherry and Celine Byrne
c/o 18 Mannix Road
Glasnevin
Dublin 9

Date: 15 February 2024

Re: BusConnects Swords to City Centre Bus Corridor Scheme
Swords to Dublin City Centre

Dear Sir / Madam,

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

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

If you have any queries in the meantime, please contact the undersigned officer of the Board on at laps@pleanala.ie

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Breda Ingle
Executive Officer
Direct Line: 01-8737291

HA0

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AN BORD PLEANÁLA	
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08 FEB 2024	
Fee: €	Type:
Time: <u>16:10</u>	By: <u>hand</u>

BusConnects Swords to City Centre Bus Corridor Scheme
Bord Pleanála Case reference: HA06D.317121-23

8th February 2024

Our response to NTA observations on our submission.

Dear Sir/Madam

Given time constraints, we will address the issues highlighted in yellow in the extract from the NTA response (Page 145 of NTA Obs on submissions - 2.6.4 08 – Carmel Sherry and Celine Byrne)

Our Lady's Park/new pedestrian/cycle bridge Drumcondra Road

NTA comment on new bridge

Regarding the suggestion to widen the existing bridge, it was determined in the options report that it would not be feasible to directly widen the existing masonry arch structure and therefore a new independent structure is to be provided to accommodate the wider highway cross section desired at this location.

Our Response

The initial proposal was to widen the existing bridge. The bridge and wall along the Park are consistent with bridges and walls along Drumcondra Road - St Patrick's Campus, Tolka Bridge, Clonliffe College, Binns Bridge) comprising cut stone walls and granite capstones. In the case of the recent realignment of the wall at St Patrick's College, the cut stone wall was fully reinstated.

Without delving through the enormous documentation, why was it not feasible. Cost? We could have retained a footpath along the Park and bridge. Now we are faced with option of no kerbing between the existing bridge and the bus lane on one side and a with a new bridge on the other, rendering the visual amenity of the current bridge practically invisible. The NTA itself finds that the no kerb "will require strengthening of the spandrel wall to accommodate the increase in surcharge. Mitigation measures will also be introduced to reduce the risk of collision with the substandard western parapet."

The proposed new bridge has made no effort to demonstrate any empathy with the historic boundary treatments of the surrounding area contrary to Volume 4 Part 3 Chapter 16.3 of their Environmental Impact Assessment Report (EIAR) The proposed bridge will have white painted steel railings and glass panels which will be much more open to graffiti than the traditional walls in the Drumcondra area.

Our Lady's Park

NTA Comment on Our Lady's Park

..For the Operational Phase the Chapter states that *'The new bridge will provide much improved cycle and pedestrian access across the River Tolka, improving the functionality of the open space, and arguably also provide increased amenity space for the park. There will be improvements to the open space with improved paving, footpaths and additional seating, and the setting of the relocated Marian statue will be enhanced.'*

Our Response

How can the NTA assert the above comments? The sizable area between the new bridge and the existing Our Lady's Park wall and also the area under the new bridge will for the most part become unusable. Per NTA *The distance between the deck soffit and the ground varies. A minimum clearance of 1.5m is provided at the abutments.* This would not allow for standing headroom. Our Ladys Park is already quite a small area. The new bridge will extend west as far as the current location of the statue. The amenity of the park will be greatly reduced.

Regarding concerns raised about antisocial behaviour

....
'Good infrastructure has also been shown to have a positive impact on levels of crime, particularly low level crimes such as theft and vandalism. There is evidence from a wide range of studies that redesigned public realm, especially those which are better lit and more visible, see significant reductions in the level of crime.'

Our Response

Our Ladys Park at this location is currently a very open and well overlooked by pedestrians. We firmly believe that the area concealed by the new bridge and between it and the existing wall will likely attract anti-social behaviour.

2.6.4.2 Wheelchair Parking Relocation

Summary of issue raised

The submission suggested the relocation of a disabled parking bay to the end of Hollybank Road due to the proposed relocation of wheelchair parking from Drumcondra Road onto Botanic Avenue increasing safety risks because of the insufficient sight lines when turning.

NTA Response to issue raised

In relation to the relocation of the disabled parking bay outside Markey's shop on Drumcondra Road Lower, this parking bay has been relocated approximately 25m away to facilitate the segregated cycle track along Drumcondra Road Lower. The suggestion to relocate the parking bay to Hollytree Road is not feasible given that there already is a segregated cycle track and relocated bus stop proposed at this location. There is sufficient space outside Fagan's on Botanic Avenue to provide this parking bay plus a compliant footpath and the desirable minimum forward visibility requirements are achieved at this location.

Our Response

What we actually said in our submission was:

It is proposed to re-locate the wheelchair parking spot outside Markey's shop/AIB on Drumcondra Road Lower to just around the corner on Botanic Avenue outside Fagan's Pub where the footpath is at its widest. Given it's closeness to the junction, drivers emerging from their vehicle would not have sufficient sightlines of vehicles turning into Botanic Avenue often at speed when they have the green light. This is a serious road safety issue. A possible re-location at the end of Hollybank Road might be considered a better option

Our main issue was the safety aspect of the proposed re-location of the wheelchair parking bay from outside Markey's shop to Botanic Avenue. We still believe it is too near the junction and there is insufficient space to accommodate such a parking bay. Drivers will be exiting on the road side and are at serious risk from vehicles turning into Botanic Avenue.

2.6.4.5 Dorset Street Junction with Eccles Street/Hardwicke Place

Summary of issue raised

This submission raised concerns regarding the introduction of a no right turn into Eccles Street and a no left turn into Hardwicke Place noting that would restrict access to Temple Street and the Mater Hospital. The submission requested at the very least the left turn into Hardwicke Place is retained with a roundabout close to St. George's church that would facilitate access to Eccles Street. It is noted that there is no indication of what alternative detour is available. It is questioned why it is necessary to remove important access points to local services.

Response to issue raised

The observed left-turns delivery vehicles from Dorset Street onto Temple Street (Hardwicke Place) is quite low (less than 12 vehicles/ hr) during the morning peak periods. The turning traffic from Dorset Street onto Temple Street can turn left at the Gardiner Street Upper to service Temple Street commercial activities.

The no-left-turn from Dorset Street onto Temple Street (Hardwicke Place) and right-turn onto Eccles Street is adopted as per the BusConnects Preliminary Design Guidance Booklet to enhance cyclist, bus priority infrastructure, and minimise travel delays at this junction by all modes.

Our Response

The above NTA response demonstrates a tunnel vision concentrating on the Bus Corridor only and not giving any weight to local concerns. They count of delivery vehicles to Temple Street and not Eccles Street. Have they counted ambulances (not all on blue lights) or even private vehicles during out-patient periods or visiting times?

Per NTA, "the proposed Access to Temple Street and Eccles Street will be available via the surrounding road network. One option for this journey for vehicles travelling inbound along Dorset Street bound for Temple Street or Eccles Street, is to turn left onto Belvedere Road, continue to Mountjoy Square and take a right along Mountjoy Square North, continue straight onto Gardiner Place before turning right onto Temple Street. Those needing to access Eccles Street can continue along Hardwicke Place and through the junction with Dorset Street Upper onto Eccles Street. An alternative is to turn left from Dorset Street onto Gardiner Street Upper, take a right via Gardiner Place before turning right onto Temple Street/ Eccles Street."

We believe the provision of the "H" sign before the junction with Belvedere Road or again at Gardiner Street will add to the total confusion of such a diversion. We do not believe this proposed diversion is reasonable considering that many people will not be regular users of the hospital facilities.

We believe there is good reason to make an exception on this occasion to needs of the BusConnects Preliminary Design Guidance Booklet and to allow at least a left turn into Temple Street/Hardwick Street with a roundabout to allow access to Eccles Street.

We urge you to take on board our comments.

Regards

Carmel Sherry
18 Mannix Road
Glasnevin
Dublin 9



Carmel Sherry

Celine Byrne
16 Mannix Road
Glasnevin

Celine Byrne

Bord Pleanála Case reference: HA06D.317121

Page 145 of NTA Obs on submissions

2.6.4 08 – Carmel Sherry and Celine Byrne

Overview of submission

A number of issues were raised and these are listed below and described below:

1. Impact to Our Lady's Park
2. Wheelchair Parking Relocation
3. Bus Stop Relocation
4. Green Embankment Areas on Drumcondra Road Lower
5. Dorset Street Junction with Eccles Street/Hardwicke Place
6. Cycle lanes in general

2.6.4.1 Impact to Our Lady's Park

Summary of issue raised

Concerns were raised regarding Our Lady's Park will be seriously impacted during and after the construction phase, suggesting the current bridge be widened to avoid the park being eliminated. The submission referred to the changes to the bridge, commenting that the area under and on the Drumcondra Road side of the new bridge will no longer be accessible and has the potential to attract antisocial behaviour. Further concerns were raised commenting that the bridge has made no effort to demonstrate any empathy with the historic boundary treatments surrounding the area, despite comments in Volume 4 Part 3 Chapter 16.3 of the EIAR, concerns were also raised regarding the white steel and glass panels will be much more open to graffiti than the traditional walls in the area.

The Our Lady Statue relocation also raised concerns, submissions commented there was a lack of consultation and the statue will no longer be placed in a prominent location.

Response to issue raised

The Statue of Our Lady will not be permanently relocated, if the statue requires temporary removal to facilitate the construction of the proposed bridge on the west side of Frank Flood Bridge, it will be returned to its current setting and as close as possible to its current location. The impact on Our Lady's Park and the Statue of Our Lady within the park has been assessed within the EIAR, particularly in Chapter 15 (Archaeological & Cultural Heritage), Chapter 16 (Architectural Heritage) and Chapter 17 (Landscape (Townscape) & Visual) in Volume 2 as outlined below.

- Chapter 15 assesses the impact of the removal and reinstatement of the statue from a cultural heritage perspective (Reference Number CBC0002CH022, also included in Appendix A15.2 (Archaeological and Cultural Heritage Inventory) in Volume 4 of the EIAR) stating the following, *'A mid-20th century Marian statue is located within a small park known as 'Our Lady's Park'. There will be a temporary impact on the setting of the memorial during construction phase. The memorial will require protection from any adverse impacts for the duration of the works and if necessary, it can be temporarily removed to ensure its protection. This cultural heritage feature has a low sensitivity value and the magnitude of impact is low therefore the potential impact is Negative, Slight, Temporary'*. It is not intended to relocate the statue, Section 15.5.1.8.2 states, *'The Marian Statue at Our Lady's Park in Drumcondra (CBC0002CH022; Figure 15.1 Sheet 15 of 18 in Volume 3 of this EIAR) will be protected from any adverse impacts during construction works and if necessary for its protection, it will be removed under archaeological supervision. This will be undertaken in accordance with a method statement agreed with the statutory authorities. It will be returned to its current setting and as close as possible to its current location following completion*

of the works.'

- Chapter 16 assesses the impact of the removal and reinstatement of the statue from an architectural heritage perspective, and specifically as it is recorded on the National Inventory of Architectural Heritage (NIAH Reference Number 50130158, also included in Appendix A16.2 (Inventory of Architectural Heritage Sites) in Volume 4 of the EIAR). The chapter states that *'The Statue of Our Lady (NIAH 50130158) will be temporarily removed to facilitate the construction of the proposed cycle and pedestrian bridge on the west side of Frank Flood Bridge. The statue is of Medium sensitivity. There is potential for loss or damage to sensitive fabric during its removal, transport, storage and reinstatement, the magnitude of which is High. The predicted Construction Phase impact will be Direct, Negative, Significant and Temporary'*. However with the appropriate mitigation (recording, removal, safe storage and reinstatement) the impact reduces to Direct, Negative, Slight and Temporary.

- Chapter 17 assesses the impact on the amenity of Our Lady's Park during construction and operation of the Proposed Scheme. During the Construction Phase the Chapter describes the impact on Our Lady's Park as Negative, Significant and Temporary / Short-Term. For the Operational Phase the Chapter states that *'The new bridge will provide much improved cycle and pedestrian access across the River Tolka, improving the functionality of the open space, and arguably also provide increased amenity space for the park. There will be improvements to the open space with improved paving, footpaths and additional seating, and the setting of the relocated Marian statue will be enhanced. Effects will become positive over time as replacement planting matures and the bridge becomes an accepted part of the townscape'*. The impact following construction is described as Neutral, Moderate / Significant and Short-Term, improving to Positive, Moderate and Long-Term at 15 years post-construction.

Regarding concerns raised about antisocial behaviour, Section 10.4.4.1.1 of EIAR Chapter 10 Population considers the Community Amenity and for Our Lady's Park, Drumcondra community area this is assessed a Negative, Moderate/Significant and Short-Term impact.

'These environmental impacts have been considered together to identify if there will be in-combination impacts acting upon the same community facilities.

The assessment concluded that there would be a range of impacts on community amenity as a result of the Operational Phase of the Proposed Scheme. The impact on community amenity in community areas predominantly along the Proposed Scheme (Swords, River Valley, Larkhill – Whitehall – Santry, Marino, Drumcondra, Glasnevin, Iona Road, North William Street, Gardiner Street, Berkeley Road, Dominick Street and Pro Cathedral) differs depending on location, however, is expected to range between Negative, Slight and Long Term to Positive, Not Significant and Long-Term. A summary of the findings of the community amenity assessment of the Operational Phase of the Proposed Scheme is as follows: • Negative, Slight and Long-Term – Swords, Larkhill – Whitehall – Santry, Marino, Drumcondra, Glasnevin, Iona Road, Gardiner Street, Berkeley Road and Pro Cathedral; • Negative, Not Significant and Long-Term – Swords and Larkhill – Whitehall – Santry; • Positive, Not Significant and Long-Term – Iona Road, North William Street, Gardiner Street, Berkeley Road, Dominick Street and Pro Cathedral.

It should be noted that the impacts outlined above are considered to be localised, and as such, the wider community areas located along the Proposed Scheme (Swords, River Valley, Larkhill – Whitehall – Santry, Marino, Drumcondra, Glasnevin, Iona Road, North William Street, Gardiner Street, Berkeley Road, Dominick Street and Pro Cathedral) are expected to experience a Neutral to Positive, Not Significant and Long-Term impact on community amenity during the Operational Phase.'

Additional information in relation to the potential community impacts arising from crime and antisocial behaviour is set out in EIAR Chapter 10 Population Appendix A10.2 Economic Impact of the Core Bus Corridors, which notes the following:

'Good infrastructure has also been shown to have a positive impact on levels of crime, particularly low level crimes such as theft and vandalism. There is evidence from a wide range of studies that redesigned public realm, especially those which are better lit and more visible, see significant reductions in the level of crime.'

Access to Our Lady's Park will still be possible from Botanic Avenue. The design intent for the FrankFlood Bridge is to provide a well-detailed structure that complements the existing historical bridge and local surroundings. A number of landscaping and urban realm improvements are proposed for the area as described in Section 4.5.4.8.2 of Chapter 4 Proposed Scheme Description of Volume 2 of the EIAR.

'The proposed bridge would require the removal of two Poplar trees within Our Lady's Park which are a different variety to one another and six Silver Birch trees adjacent to Millmount Terrace. Six new smaller-sized trees have been proposed surrounding the square paved area in Our Lady's Park, subject to underground utilities. Three new small canopy trees are proposed at the west end of the bridge adjacent to Millmount Terrace.'

The existing square area of paving surrounding the statue on the south side of the river will be replaced and enhanced with a combination of stone and concrete paving together with new seating as a local area enhancement. The path close to the river will be re-aligned and re-surfaced to meet with the new paved square. Additional planting is to be provided on the eastern side of the path to prevent access to the narrow embankments leading to the river side beneath the structure.

The bridge structure and its parapets have been designed to be slender and visually 'light' to enable views of the existing road bridge to be retained. A two-tone colour scheme has been adopted which will create distinction between the central girder and the edge member preventing it appearing monolithic. The parapet top rail, posts and edge member are proposed to be painted light grey. The central girder is to be coloured oxide red which reflects the dark red brick colour in some of the buildings in proximity to the bridge. The proposed mesh panel of the parapet is to be stainless steel. The soffit of the bridge shall be painted black to create a shadow effect further improving the slender appearance of the edge member.

The bridge deck is proposed to be an anti-slip surface consisting of aggregate bonded together with an epoxy resin. This surface continues to the junction with Millmount Terrace to provide a consistent application of the same material. The cycle way section will be coloured 'Tuscan Terracotta' resin or similar in order that it appears as a tone that complements the standard cycle ways. The footway section will be coloured in a grey resin in order that it complements the new paved footways in the area'.

Figure 2.70 West Elevation of Proposed Bridge with an Oxide Red Colour Scheme

Further details of the design considerations for the bridge can be found in Appendix J – Structures Preliminary Design Report of the Preliminary Design Report provided in the Supplementary Information.

Regarding the suggestion to widen the existing bridge, it was determined in the options report that it

would not be feasible to directly widen the existing masonry arch structure and therefore a new independent structure is to be provided to accommodate the wider highway cross section desired at this location.

Regarding the comment raised about lack of consultation with local people regarding the changes to the community space. The Public Consultation Report 2018-2022 provided in the Supplementary Information for the Proposed Scheme outlines the extensive public consultation and stakeholder engagement undertaken during that period, with three rounds of non-statutory public consultation undertaken.

Throughout the three rounds a number of consultation tools were used, including:

- a dedicated website, launched in May 2017;
- an individual brochure for the Proposed Scheme (updated at all 3 rounds);
- public information events (in person for first and second rounds, virtual for third round),
- Community Forum events, to create a two-way communication process with representatives of local communities, (in person for first and second rounds, virtual for third round)
- range of digital channels, including Twitter and Facebook;
- traditional published material;
- press and radio advertising;
- outdoor advertising;
- presentations; and
- infographics.

The public events took place in accessible venues chosen to maximise the level of local engagement and attendance where possible. These events allowed members of the public to speak directly and in detail with members of the BusConnects Infrastructure team about the proposals. These non-statutory Public Information Events were advertised in local newspapers, through radio, on the BusConnects website, through extensive email reminders to public representatives, Local Authorities' Public Partnership Networks (PPN's), emails to Community Forum members, promoted through social media and digital channels.

It is acknowledged by the NTA that the change in design from an initial proposal to widen the existing bridge to a parallel structure was introduced at the third round of public consultation in November 2020.

The third round of public consultation took place from 4 November 2020 to 16 December 2020. With the continuing effect of the COVID-19 pandemic and associated restrictions, the third Public Consultation was held largely virtually. A virtual consultation room for the Proposed Scheme was developed and virtual access to the room was facilitated. Along with offering a call back facility, the room provided a description of the Preferred Route from start to finish with supporting maps and included information of all revisions made since the previous rounds of public consultation, as well as other supporting documents. Over the six weeks of the consultation, 234 unique users visited the virtual information room for the Proposed Scheme. A third Community Forum virtual consultation call was also held on 16 November 2020, as part of the third round of non-statutory consultation.

As per the previous rounds, those properties continuing to be either potentially impacted; newly potentially impacted; or no-longer potentially impacted were written to directly to receive information on the consultation in advance of any wider publication of the proposals. One-to-one meetings were offered via Zoom or over the phone for those who wished to discuss the proposals further in relation to their own property with the minutes being recorded as part of the consultation process. In total, 243 letters were sent between 1 and 3 November.

As per previous rounds the public were invited to make written submissions in relation to the published proposals to the BusConnects Infrastructure team either through an online form, by email or by post. In addition, virtual meetings were resumed with residents' groups to provide updates on aspects of the Proposed Scheme. There were 231 submissions over the second and third phase of public consultation (March / April 2020 and November / December 2020).

The scheme drawings in the consultation brochure highlighted the revised arrangement for the proposed bridge at the existing Frank Flood Bridge, see Figure 2.71 below.

Figure 2.71 Extract from Updated Draft PRO Drawings - Third round of non-statutory consultation

Advertisements detailing where interested parties could access further information on the CBC including viewing the proposals, making a submission and attending information events were placed in local and national newspapers, online and in highly visible areas around the Greater Dublin Area. There were 200 submissions relating to the Proposed Scheme during this round of non-statutory public consultation.

2.6.4.2 Wheelchair Parking Relocation

Summary of issue raised

The submission suggested the relocation of a disabled parking bay to the end of Hollybank Road due to the proposed relocation of wheelchair parking from Drumcondra Road onto Botanic Avenue increasing safety risks because of the insufficient sight lines when turning.

Response to issue raised

In relation to the relocation of the disabled parking bay outside Markey's shop on Drumcondra Road Lower, this parking bay has been relocated approximately 25m away to facilitate the segregated cycle track along Drumcondra Road Lower. The suggestion to relocate the parking bay to Hollytree Road is not feasible given that there already is a segregated cycle track and relocated bus stop proposed at this location. There is sufficient space outside Fagan's on Botanic Avenue to provide this parking bay plus a compliant footpath and the desirable minimum forward visibility requirements are achieved at this location. The wheelchair accessible parking bays will be designed in accordance with the requirement of the Building Regulations TGD Part M as described in Section 6 of the BusConnects Preliminary Design Guidance Booklet (included in EIAR Volume 4, Appendix A4.1).

The impact of the scheme on parking and loading is assessed in Chapter 6 Traffic and Transport in Volume 2 of the EIAR. The conclusion of these assessments is summarised below,

Section 4 (Shantalla Road to Botanic Avenue) – *'With the change in parking provisions north of R132 Swords Road / Iveragh Road Junction, the Proposed Scheme will be able to provide significant improvements to walking, cycling and bus facilities, and encourage the use of sustainable modes of transport, which will ultimately reduce the demand for public parking spaces. Considering the overall retention of 265 parking spaces compared to a loss of four spaces and the potential shift to sustainable modes, the anticipated impact on parking and loading in Section 4 during the Operational Phase will be Negative, Slight and Long Term.'*

Section 5 (Botanic Avenue to Granby Row – *'With the change in parking provisions at the locations specified, the Proposed Scheme will be able to provide significant improvements to walking, cycling and bus facilities, and encourage the use of sustainable modes of transport, which will ultimately reduce the demand for public parking spaces. Considering the overall retention of 686 parking*

spaces compared to a loss of 19 spaces and the potential shift to sustainable modes, the anticipated impact on parking and loading in Section 5 during the Operational Phase will be Negative, Slight and Long Term)

2.6.4.3 Bus Stop Relocation

Summary of issue raised

The submission raised concerns with the relocation of Bus Stop 19 due to the reduced sightline when turning right, the respondent suggested to relocate the bus stop to the location of Bus Stop 17. The respondent commented that there are currently no bus lane markings between Hollybank Road and Botanic Avenue on Drumcondra Road, as is now proposed.

Response to issue raised

The NTA notes the support of the relocation of Bus Stop 17. Regarding Bus Stop 19, the design of the Proposed Scheme at this location complies with the visibility requirements set out in Section 4.4.5 of DMURS. The Safety Audits undertaken for the Proposed Scheme, included as Appendix M of the Preliminary Design Report provided in the Supplementary Information did not highlight any safety issues with the proposed arrangement in this regard.

2.6.4.4 Land acquisition

Summary of issue raised

The respondent commented it is unclear who will be responsible for the maintenance of the green areas during the period from their acquisition and the commencement and completion of the BusConnects works, it is noted that any approval of the Proposed Scheme plans should include conditions relating to the maintenance of these green areas.

It continued to query why land acquisition of green areas is needed between Hollybank Road and St Alphonsus Road on Drumcondra Road for a cycle lane, commenting that currently cycle lanes exist alongside footpaths and will continue that way in the designs proposed.

Response to issue raised

Regarding the point raised about maintenance, the NTA will continue the close liaison with the relevant local authority that has been in place during the planning and design stage of the Proposed Scheme, during and throughout the subsequent construction stage. This will include engaging and collaborating on the construction arrangements, the road maintenance arrangements during construction and the standard to which the Proposed Scheme will be completed prior to transfer back to the relevant local authority, together with record retention, all in full accordance with the EIAR. Given the legislative framework that is in place, these are matters that can, and will, be successfully addressed between local authority and the NTA, in the absence of any approval condition.

Regarding the query as to why land acquisition of the green areas is needed between Hollybank Road and St Alphonsus Road, Temporary and permanent land acquisition is required in order to widen the existing shared pedestrian and cycle path along the west side of Drumcondra Road Lower. These sections of offline cycle track will be upgraded as part of the Proposed Scheme to improve the cycle track quality of service. The proposed cycle track is indicated in EIAR Volume 3 Chapter 4 Proposed Scheme Description Figures, 03. General Arrangement drawings Sheets 31 and 32, see Figure 2.72 and Figure 2.73.

Figure 2.72 Extract from General Arrangement Drawing (Sheet 31)

Figure 2.73 Extract from General Arrangement Drawing (Sheet 32)

2.6.4.5 Dorset Street Junction with Eccles Street/Hardwicke Place

Summary of issue raised

This submission raised concerns regarding the introduction of a no right turn into Eccles Street and a no left turn into Hardwicke Place noting that would restrict access to Temple Street and the Mater Hospital.

The submission requested at the very least the left turn into Hardwicke Place is retained with a roundabout close to St. George's church that would facilitate access to Eccles Street. It is noted that there is no indication of what alternative detour is available. It is questioned why it is necessary to remove important access points to local services.

Response to issue raised

The observed left-turns delivery vehicles from Dorset Street onto Temple Street (Hardwicke Place) is quite low (less than 12 vehicles/ hr) during the morning peak periods. The turning traffic from Dorset Street onto Temple Street can turn left at the Gardiner Street Upper to service Temple Street commercial activities.

The no-left-turn from Dorset Street onto Temple Street (Hardwicke Place) and right-turn onto Eccles Street is adopted as per the BusConnects Preliminary Design Guidance Booklet to enhance cyclist, bus priority infrastructure, and minimise travel delays at this junction by all modes.

2.6.4.6 Cycle lanes in general

Summary of issue raised

This submission believes that some footpaths are proposed to be narrowed too much to facilitate cycle tracks. They are also concerned about the speed of e-scooters using the cycle lanes. They believe that e-scooters and electric bikes should be directed away from shared footpaths and cycle lanes.

The submission goes on to say that cycle lanes should be clearly marked and maintained with a different colour and/or texture to differentiate from the footpaths.

Response to issue raised

Section 4.6.2.1 of EIAR Chapter 4 Proposed Scheme Description states: 'The desirable minimum width for a footpath is 2.0m. This width should be increased in areas catering for significant pedestrian volumes where space permits. DMURS defines the absolute minimum footpath width for road sections as 1.8m based on the width required for two wheelchairs to pass each other. Building for Everyone: A Universal Design Approach (NDA 2020), defines acceptable minimum footpath widths at specific pinch points as being 1.2m wide over a two-metre length of path.

In line with the Road User Hierarchy designated within DMURS, at pinch points the width of the general traffic lane should be reduced first, then the width of the cycle track should be reduced before the width of the footpath is reduced where practicable.

Throughout the Proposed Scheme, footpath widths of two metres or wider have been proposed, however where this has not been achieved, deviations from standard have been required as outlined in Section 4.5.'

The NTA acknowledges the comments raised in relation to e-scooters and electric bikes. Enforcement of road traffic laws is a matter for An Garda Síochána.

Regarding marking of the cycle lanes, as described in Section 5.5 Appendix A4.1 Preliminary Design Guidance Booklet (PDGB) of the EIAR, a key feature of the Proposed Scheme is to utilise colour contrasting pavement on the cycle track:

'the use of machine laid asphalt for the cycle track has proven to be an effective way of providing a high level of service with a safe, smooth and continuous surface. This, however, offers very little contrast to the adjacent carriageway, and depends on the type of edge kerb and the presence of road markings to offer a visual differentiation between the carriageway and the cycle track. Consideration should be given to including an additional colour contrast to the cycle track in the form of an alternative coloured asphalt (e.g. red, buff, etc) or adding coloured chips to the asphalt surface during installation (e.g. red chip).'

This proposal is also in line with Section 5.6.6 of the National Cycling Manual which proposes the use of red coloured surfacing as shown below in Figure 2.74.

Figure 2.74 Typical cycle track surfacing detail from the National Cycle Manual

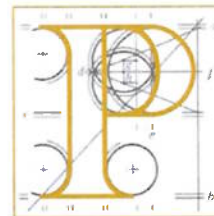
In summary, the use of red coloured asphalt, or red coloured epoxy resin has been specified for all cycle tracks across the BusConnects Infrastructure Works to ensure legibility and conspicuity of the proposed cycle tracks and to ensure safety for vulnerable road users.

Also on page 111

Access to Temple Street and Eccles Street will be available via the surrounding road network. One option for this journey for vehicles travelling inbound along Dorset Street bound for Temple Street or Eccles Street, is to turn left onto Belvedere Road, continue to Mountjoy Square and take a right along Mountjoy Square North, continue straight onto Gardiner Place before turning right onto Temple Street. Those needing to access Eccles Street can continue along Hardwicke Place and through the junction with Dorset Street Upper onto Eccles Street. An alternative is to turn left from Dorset Street onto Gardiner Street Upper, take a right via Gardiner Place before turning right onto Temple Street/ Eccles Street.

The no-left-turn is adopted as per the BusConnects Preliminary Design Guidance Booklet to enhance cyclist and bus priority infrastructure and to maintain Bus and cycling priority along the Corridor.

Our Case Number: ABP-317121-23



**An
Bord
Pleanála**

Carmel Sherry and Celine Byrne
c/o 18 Mannix Road
Glasnevin
Dublin 9

Date: 05 January 2024

Re: BusConnects Swords to City Centre Bus Corridor Scheme
Swords to Dublin City Centre

Dear Sir / Madam,

I have been asked by An Bord Pleanála to refer to the above mentioned proposed road development application for approval under section 51(2) of the Roads Act, 1993 as amended.

The Board has considered the case and hereby notifies you that it has decided to determine the application without an oral hearing. In this regard, please be advised that the Board has absolute discretion to hold an oral hearing and has concluded that this case can be dealt with adequately through written procedure.

Accordingly, the Board hereby considers it appropriate to invite you to make a submission in accordance with section 217B of the Planning and Development Act 2000, as amended, in relation to the submission dated 23rd November 2023 received from the National Transport Authority. A copy of the submission can be found on the Board's website at www.pleanala.ie/en-ie/case/317121 under the heading responses. This submission together with the application documentation is also available for public inspection at the following locations:

An Bord Pleanála, 64 Marlborough Street, Dublin 1

National Transport Authority, Dún Scéine, Harcourt Lane, Dublin 2

Any submission in relation to the above must be received by the Board within 5 weeks from the date of this letter (i.e. not later than 5:30pm on the 8th February 2024). No additional fee is required for making a submission. As there are a number of busconnects applications with the Board for approval you are requested in your response, if any, to provide the following:

- (a) The reference number ABP-317121-23
- (b) Your name and address.

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde Baile Átha Cliath 1 D01 V902	64 Marlborough Street Dublin 1 D01 V902
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(c) The name and address of the person you are acting on behalf of.

If you have any queries in relation to the matter, please contact the undersigned officer of the Board.

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,



Breda Ingle

Executive Officer

Direct Line: 01 873 7291

ADHOC

Tel
Glao Áitiúil
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Láithreán Gréasáin
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Tel (01) 858 8100
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64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Date: 05 January 2024

Re: BusConnects Swords to City Centre Bus Corridor Scheme
Swords to Dublin City Centre

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Executive Officer
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ADHOC