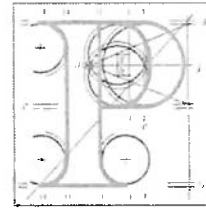


Our Case Number: ABP-317121-23



An
Bord
Pleanála

Dublin City Council
Planning & Property Development Department
Block 4, Floor 3
Civic Offices
Wood Quay
Dublin 8

Date: 06 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. The contents of your letter have been noted.

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

HA06

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

**Written Submission from Dublin City
Council Chief Executive
to An Bord Pleanála
in relation to
the National Transport Authority's
BusConnects Dublin – Swords to City Centre Core Bus Corridor Scheme
An Bord Pleanála Ref. ABP-317121-23**

1.0	Application – Swords to City Centre Core Bus Corridor Scheme
1.1	Scope of Report
2.0	Description of the Proposed Development
2.1	Relevant Planning History
2.2	Policy Context
2.2.1	Regional Level
2.2.2	Citywide Level
2.2.2.1	Dublin City Development Plan 2022-2028
2.2.2.1.1	Strategic Development and Regeneration Areas
2.2.2.1.2	Area Specific Plans
2.3	Departmental Reports
2.4	Planning Assessment
2.4.1	Planning Policy
2.4.2	Environmental Impact Assessment Report (EIAR)
2.4.3	Natura 2000
2.4.4	Zoning and other designations
2.4.4.1	Land Use Zoning Objectives
2.4.4.2	Built Heritage Objectives
2.4.5	Impact on Amenity
2.4.6	Strategic Observation from the Forward Planning Section
2.4.7	Environment and Transportation Department Comments
2.4.7.1	General Comments
2.4.7.2	Traffic Division Comments
2.4.7.2.1	Project Delivery Mechanism
2.4.7.3	Roads Division
2.4.7.4	Environmental Protection Division
2.4.7.5	Water Framework Directive
2.4.7.6	Flood Prevention
2.4.8	Archaeology Section Comments
2.4.9	Conservation Section Comments
2.4.10	City Architects Division Comments
2.4.11	City Parks, Biodiversity and Landscape Division Comments
2.5	Conclusion

Appendix 1 – Recommended Conditions

1.0 Swords to City Centre Core Bus Corridor Scheme

The National Transport Authority has applied under Section 51 (2) of the Roads Act 1993 (as amended) to An Bord Pleanála for approval in relation to a proposed road development consisting of the Swords to City Centre Core Bus Corridor Scheme together with all ancillary and consequential works for the purpose of facilitating public transport.

1.1 Scope of Report

In accordance with Section 51 (3)(b) of the Roads Act 1993 (as amended), this submission sets out the views of Dublin City Council (a prescribed body), on the Swords to City Centre Core Bus Corridor Scheme and the potential effects of the proposed development on the environment and the proper planning and sustainable development of the area. This is a revised report, and replaces Dublin City Council's earlier report, following the extension of the submission period on the scheme due to the previous omission of certain materials from the Environmental Impact Assessment Report and Natura Impact Statement on the NTA website, which has now been rectified.

In early 2019, as directed by the Chief Executive of Dublin City Council, a multi-disciplinary corporate team was established to provide a liaison role for the NTA BusConnects Project. The purpose of this team is to effectively manage the communications and act as the primary conduit for information exchange between Dublin City Council and the National Transportation Authority in relation to the BusConnects Programme.

This dedicated BusConnects Liaison Team has facilitated the exchange of information and engagement with other departments and sections within the City Council regarding the design of the bus corridors including the proposed scheme.

The BusConnects programme seeks to greatly improve bus services in Irish cities, including Dublin, so that journeys by bus will be fast, reliable, punctual, convenient and affordable. BusConnects is part of the Government's policy to improve public transport and address climate change in Dublin and other cities. BusConnects is included as a specific policy objective of Project Ireland 2040 – The National Development Plan 2018 – 2027 (Government of Ireland 2018); and the Climate Action Plan 2021 (Government of Ireland 2021b).

2.0 Description of the Proposed Development

This proposed scheme is one of 12 stand-alone Core Bus Corridor (CBC) Schemes to be delivered under the BusConnects Dublin - Core Bus Corridors (CBC) Infrastructure Works. The CBC Infrastructure Works, once completed, will deliver the radial core bus corridors identified in the Transport Strategy for the Greater Dublin Area 2016 – 2035.

The proposed route is one of 12 arterial routes into the city centre, which are as follows:

- Clongriffin to City Centre Core Bus Corridor Scheme
- **Swords to City Centre Core Bus Corridor Scheme**
- Ballymun/Finglas to City Centre Core Bus Corridor Scheme

- Blanchardstown to City Centre Core Bus Corridor Scheme
- Lucan to City Centre Core Bus Corridor Scheme
- Liffey Valley to City Centre Core Bus Corridor Scheme
- Tallaght/Clondalkin to City Centre Core Bus Corridor Scheme
- Kimmage to City Centre Core Bus Corridor Scheme
- Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme
- Bray to City Centre Core Bus Corridor Scheme
- Belfield/Blackrock to City Centre Core Bus Corridor Scheme.

The Proposed Scheme has an overall length of approximately 12 km. It will commence south of Swords at Pinnock Hill Junction and travels in a southerly direction along the R132 Swords Road past Airside Retail Park, Dublin Airport and Santry Park. The route continues on the R132 past Santry Demesne, where the Swords Road joins the R104 at Coolock Lane. The route continues on the R132 in a southerly direction through Santry Village. It continues along the Swords Road past Whitehall to Griffith Avenue. The route follows Drumcondra Road Upper past the Dublin City University St Patrick's Campus to the River Tolka. It continues through Drumcondra, on Drumcondra Road Lower to Binns Bridge on the Royal Canal. From there it continues on Dorset Street Lower as far as Eccles Street, from where it continues on Dorset Street Upper to North Frederick Street and Granby Row.

The Proposed Scheme has been developed to ensure that the principles of universal design are integrated fully in the design, providing access for all users, and eliminating barriers to disabled people. The Proposed Scheme will make significant improvements to pedestrian and cycling facilities and to bus priority.

Some of the key changes that will be made to the existing corridor as a result of the Proposed Scheme are the following:

- The number of pedestrian signal crossings will increase by 31% from 86 to 125 as a result of the Proposed Scheme;
- The proportion of segregated cycle facilities will increase from 28% on the existing corridor to 89% on the Proposed Scheme;
- The proportion of the route having bus priority measures will increase from 72% on the existing corridor to 100% (both directions) on the Proposed Scheme.

The Proposed Scheme is described in the following geographical sections:

- Section 1: Pinnock Hill Junction to Airside Junction;
- Section 2: Airside Junction to Northwood Avenue;
- Section 3: Northwood Avenue to Shantalla Road;
- Section 4: Shantalla Road to Botanic Avenue; and
- Section 5: Botanic Avenue to Granby Row.

Section 1: Pinnock Hill Junction to Airside Junction

This section falls outside of Dublin City Council's functional area.

On this section, the existing roundabout at Pinnock Hill will be modified to be a fully signalised junction. Both temporary and permanent land acquisition is required within this section. Existing bus lanes will be maintained, the existing footpath will be upgraded, and segregated cycle lanes provided.

Section 2: Airside Junction to Northwood Avenue

This section falls outside of Dublin City Council's functional area.

Between the Airside and Cloghran Junctions, the existing bus lanes will be maintained, the existing footpaths will be upgraded and extended, and segregated cycle tracks provided. For the most part cycle paths are proposed on either side of the road, while a two-way cycle track on the west side of the airport junction is proposed. Modifications are proposed to a number of junctions and roundabouts, including the Airport Roundabout, to provide improved infrastructure for pedestrians and cyclists. Both the footpath and cycle track are narrow adjacent to the Thatch Cottage, a protected structure, to mitigate land acquisition. A number of bus stops are to be relocated, and most of the new proposed bus stops are island bus stops. Temporary land acquisition is required within this Section at various locations to facilitate works. Permanent land acquisition is also required within this Section in order to allow for cross-section widening.

Section 3: Northwood Avenue to Shantalla Road

This section falls partly within Dublin City Council's functional area (the area south of Coolock Lane and Santry Avenue).

Signal Controlled Bus Priority as well as localised narrowing of the cycle track will be provided between Northwood Avenue and Coolock Lane to mitigate impact on properties and the Santry Demesne historical wall and proposed National Heritage Area. A new bus terminus will be provided in the green space opposite the group of retail premises at the junction of the Swords Road and Coolock Lane.

Between Coolock Lane and the entrance to Omni Park Shopping Centre, it is proposed to extend continuous bus lanes and cycle tracks in both directions. This will require some limited land take from adjacent properties on both sides of the existing road and the removal of existing on-street car parking.

Between the Omni Park Shopping Centre entrance and the Shantalla Road junction it is proposed to maintain the two-way general traffic lanes and introduce continuous bus lanes in both directions. A segregated footpath will be maintained on either side. This will require some land take from adjacent properties on both sides of the existing road in Santry Village and the removal of existing on-street car parking. Off street parking is proposed at residential properties between the shopping centre and Shanowen Road to offset the loss of on-street parking.

It is proposed to redirect cyclists through Lorcan Road and Shanrath Road as a Quiet Street. This cycle route commences at the junction with Omni Park Shopping Centre and connects with the Swords Road at the junction with Shantalla Road. A two-way cycle track is proposed to connect the Quiet Street from Shanrath Road through the Shanrath junction, connecting to the existing Quiet Street west of the off-slip.

A dedicated bus lane is proposed inbound along the Shantalla Road Bridge and a general traffic lane is maintained in both directions. The Shantalla Road junction will be upgraded to accommodate the bus lane and cycle and pedestrian movements.

Section 4: Shantalla Road to Botanic Avenue

From Shantalla Road to the Botanic Avenue, a continuous bus lane will be provided in both directions. It is proposed to retain the existing bus lanes and provide a segregated cycle track and footpath between Shantalla Road and Millmount Avenue in both directions. Between Shantalla Road and Collins Avenue the main north/south cycle route and pedestrian route will continue via a Quiet Street Treatment along the Swords Road. An additional south bound segregated cycle track will be provided

adjacent to the south bound slip lane of the Shantalla Road junction. A short section of this cycle track is reduced to 1.5m wide in front of the Church of the Holy Child in addition to a reduction of the existing 3.5m wide footpath to 2m wide.

Localised narrowing of the cycle track is also required at Plunket College and Highfield Hospital to avoid land take and impacting a row of high-quality trees along the boundary of Plunket College. Narrowing is also required outbound along Drumcondra Road Upper between St Patrick's College and Griffith Avenue, where providing a standard width would result in significant loss of mature trees.

It is proposed to upgrade the Collins Avenue junction to better facilitate bus priority and provide dedicated, segregated bus lanes to the stop lines with signal-controlled priority. The other key junctions, at Griffith Avenue, Richmond Road/Millmount Avenue and Botanic Avenue, will be upgraded to improve cyclist provision and bring bus lanes closer to the stop lines.

In Drumcondra, an independent pedestrian and cycle bridge over the River Tolka is being provided as part of the Proposed Scheme to allow the proposed bus lanes to be accommodated over the existing bridge. The proposed bridge would require the removal of two Poplar trees within Our Lady's Park while four new smaller-sized trees have been proposed surrounding the square paved area, 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.

Section 5: Botanic Avenue to Granby Row

To facilitate bus lanes and cycle tracks in each direction it is necessary to remove one inbound and one outbound traffic lane between Clonliffe Road and Eccles Street. In addition, the landscaped central reserve will be removed between Portland Avenue and Belvidere Road to facilitate the required cross-section. South of Belvidere Road, the existing landscaped central reserve will be maintained.

Continuous bus lanes will be provided throughout, with the exception of a short section of signalised bus priority inbound between Whitworth Place and Portland Place. On Dorset Street Lower, south of Eccles Street, some minor kerb realignments are proposed to provide bus, cycle and a single traffic lane in each direction. The painted central reserve will be removed to facilitate this. Four existing cellars are affected by the Proposed Scheme. The cellars will be acquired and infilled with concrete.

It is proposed to provide new turning restrictions at the following junctions:

- Left turn ban from Dorset Street to Synott Place;
- Right turn ban from Dorset Street Lower inbound to Eccles Street, and
- Left turn ban from Dorset Street to Hardwicke Place.

On North Frederick Street, the existing bans on left-turning traffic from Dorset Street Lower and straight through traffic from Blessington Street will be maintained. North Frederick Street is restricted to one southbound traffic lane and one northbound traffic lane from the junction of Dorset Street with Gardiner Row.

South of Gardiner Row the existing southbound traffic lane and bus lane will be maintained. This section of the Proposed Scheme ties into the existing street layout at Parnell Street. Two-way cycle facilities will be provided on the west side of Parnell Square East. The right turn slip lane from Parnell Square North will be closed to facilitate the two-way cycle track.

Outbound buses will use Parnell Street, Parnell Square West and Granby Row to access Dorset Street Upper. A bus lane will be provided along these roads to facilitate outbound buses.

The existing signalised junctions at Clonliffe Road; Whitworth Road; Belvidere Road, North Circular Road, Gardiner Street Upper, Eccles Street and North Frederick Street/Blessington Street are proposed to be upgraded to provide improved infrastructure for pedestrians and cyclists.

At-grade cycle tracks have been utilised in order to maintain the existing kerb lines as the route approaches the city centre. The cycle tracks will be at carriageway level and segregated from general traffic using slip formed kerbs. At-grade cycle tracks have been proposed at Drumcondra Road Lower, southbound and Dorset Street Lower, between Portland Place Junction and Eccles Street Junction.

Permanent acquisition of cellars and private landings is required within this Section along Dorset Street Upper.

The construction phase for the proposed scheme is anticipated to take approximately 36 months to complete and will be based on individual sectional completions that will have shorter individual durations. Three construction compounds will be located in Fingal's functional area, the closest being north of Coolock Lane on the east side of Swords Road, just outside Dublin City Council's functional area. Two Construction Compounds will be located at the following sites within Dublin City Council's functional area:

- Construction Compound SW4: Located on the southeast of the junction between Collins Avenue and Swords Road (on part of the site owned by Dublin City Council with a part 8 permission (3927/22 LAW) for residential development. This site is zoned Z12: Institutional Land (Future Development Potential).
- Construction Compound SW5: Located in part of Our Lady's Park, south of Frank Flood Bridge over the Tolka River, just north of Botanic Avenue, on the west side of Drumcondra Road Lower. This site is zoned Z9 Open Space.

A Construction Environmental Management Plan and a Construction Travel Management Plan have been submitted with the application.

The NTA is a statutory non-commercial body, which operates under the aegis of the Department of Transport. The NTA was established on foot of the Dublin Transport Authority Act 2008 (as amended) (the '2008 Act'). In the case of the Proposed Scheme, the functions of the NTA include undertaking the design and planning process, seeking (and obtaining) all development consents including related compulsory acquisition approvals from An Bord Pleanála and constructing the Proposed Scheme (if approved).

Environmental Impact Assessment Report (EIAR)

An EIAR has been submitted as part of the application. The Board is the competent authority, and the assessment of the EIAR is a matter for the Board.

The scope of this report deals with demonstrating how the proposed overall development is in accordance with Dublin City Development Plan 2022-2028 policies and objectives.

2.1 Relevant Planning History

It is noted that the planning history as set out in the Planning Report submitted as Appendix A2.1 to the EIAR omits all the Strategic Housing Development permissions on and adjacent to the route. Significant planning applications recently permitted along and adjacent to the route include:

**Oscar Traynor Road Site, Coolock Lane, Dublin 5/Dublin 9
LRD6019/22-S3 (ABP-316108-23)**

Permission granted for 853 new residential units, crèche, retail and commercial units. Currently under third party appeal to An Bord Pleanála.

**Chadwick's Builder's Merchant (Heiton Buckley), corner of Swords Road and Santry Avenue
314019-22**

Mixed use development including 350 apartments, commercial, retail, and ancillary works. Live application, with an Bord Pleanála, decision pending.

2713/17 (as extended by 2713/17x1) and subsequent amending permissions, including 2737/19 and 4549/22)

Santry Place, Santry Avenue and Swords Road, Santry, Dublin 9

Mixed use development including 253 residential units and office space, and all ancillary site works. 3 of 5 blocks completed and occupied, permission expires 2026.

SHD0005/20 (ABP-306987-20)

Lands at former Swiss Cottage, Swords Road and Schoolhouse Lane, Santry, Dublin 9

Permission granted for 120 build to rent residential units. Completed and occupied.

North West Corner of the Omni Shopping Centre, Santry and Santry Hall Industrial Estate, Swords Road, Dublin 9

SHD0019/22 (ABP ref TA29N.314458)

Mixed use development including 457 apartments, retail/commercial/crèche, and ancillary works. Live application, with an Bord Pleanála, decision pending.

Lands to the northeast of Omni Park Shopping Centre

SHD0006/20 (ABP-307011-20)

Mixed use development including 324 residential units, café, shop, crèche, and 81-bedroom aparthotel.

Site c. 1.07 ha at Collins Avenue, Whitehall, Dublin 9

3927/22 LAW – 83 dwellings, in 2 5-storey high blocks, with all ancillary works. Two new vehicular entrances off Collins Avenue. Approved.

Former Barina Site/Hartfield Place, Site north of Highfield Hospital, Swords Road, Whitehall, Dublin 9 SHD0010/22 (ABP-313289-22)

Residential development of 475 apartments with café and crèche, including amendments to road layout. Permission granted with amending condition to amalgamate units (to provide for 443 apartments) by An Bord Pleanála.

Parent permission SHD0002/20 (ABP 306721-20), amending permission LRD6021/22-S3

Broomhill House (Rear of Bonnington Hotel), Swords Road, Whitehall, Dublin 9

Permission granted for 124 apartments, construction completed.

116, 118, 120, Drumcondra Road Upper, DUBLIN 9 4533/19 (ABP-307422-20)

Permission granted for student accommodation development of 122 bed spaces, granted with amending conditions.

Royal Canal Greenway, Sheriff Street Upper, Dublin 1, to Ashtown, Dublin 15

2870/15 LAW – phase 3 includes a toucan crossing at Binn Bridge (a protected structure), Drumcondra Road Lower. Approved.

104A, Part 105-106 & 107-115, Dorset Street Upper, & 65-70 Wellington Street, Dublin 1

2838/15

Permission granted for 463 student bedspaces (subject to amending conditions). Completed and occupied.

124-126, Parnell Street, Dublin 1

SHD0004/19 PL29N.303615 (as amended by SHD0004/22, ABP-312221-21)

Permission granted for 276 student bedspaces.

2.2 Policy Context

2.2.1 Regional Level

Regional Spatial and Economic Strategy for the Eastern and Midlands Regional Assembly (RSES) 2019-2031.

The principal aim of the RSES is to support the implementation of Project Ireland 2040 by providing a long-term strategic planning and economic framework for the development of the Region. The RSES is underpinned by three key principles, i.e. placemaking, climate action and sustainable economic opportunity and growth. Sixteen Regional Strategic Outcomes (RSOs) are set out which are broadly aligned with the National Strategic Outcomes of the NPF. The RSES includes a more detailed Dublin Metropolitan Area Strategic Plan (MASP) which identifies strategic development and employment areas for population and employment growth, in addition to more generalised consolidation and re-intensification of infill, brownfield and underutilised lands within Dublin City and its suburbs.

The Dublin MASP sets out a list of key transport infrastructure investments in the Metropolitan Area as supported by National policy (RPO 8.7, RPO 8.9) to promote mobility management, sustainable transport use and the delivery of bus projects including Core Bus Corridors and Regional Bus Corridors. The cycling objectives include delivery of the cycle network set out in the NTA's Greater Dublin Area Cycle Network Plan and investment priorities for cycleways. Overall, the RSES supports the delivery of key sustainable transport projects including BusConnects as set out in RPO 5.2.

2.2.2. Citywide Level

2.2.2.1 THE DUBLIN CITY DEVELOPMENT PLAN 2022-2028 – SUSTAINABLE MOVEMENT AND TRANSPORT & OTHER RELEVANT POLICIES

The City Development Plan is the statutory planning context for the assessment of development proposals. It sets out the policy context for the next six years to 2028. A significant number of policies have relevance for the delivery of transport infrastructure in the city.

The core strategy set out in the plan is to develop a low carbon, sustainable and climate resilient capital city, where people will choose to live, work, experience city living, invest and socialise. The vision for the city is that, within the next ten years, it will have an established international reputation as a city region that is one of Europe's most sustainable, dynamic and resourceful. It is envisaged that the city will be a beautiful, compact city, with a distinct character and a vibrant culture, and with a diverse, green and innovation-based economy. The city will be a socially inclusive city of urban neighbourhoods based on the principle of the 15-minute city, which allows people's daily requirements to be reached within 15 minutes by foot, bicycle or public transport, and is therefore compact. All development will be connected by exemplary public transport, cycling and walking systems.

Dublin City Council (DCC) supports the improvement of public transport and cycling which will allow for higher density development, thereby creating a more sustainable interaction between land-use and transport. Chapter 8 of the Development Plan 'Sustainable Movement and Transport' sets out DCC policies and objectives which are relevant to Bus Connects. For convenience, relevant policies and objectives are quoted hereunder:

SMT1 Modal Shift and Compact Growth *To continue to promote modal shift from private car use towards increased use of more sustainable forms of transport such as active mobility and public transport, and to work with the National Transport Authority (NTA), Transport Infrastructure Ireland (TII) and other transport agencies in progressing an integrated set of transport objectives to achieve compact growth.*

SMT3 Integrated Transport Network *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.*

SMT4 Integration of Public Transport Services and Development *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.*

SMT8 Public Realm Enhancements *To support public realm enhancements that contribute to place making and liveability and which prioritise pedestrians in accordance with Dublin City Council's Public Realm Strategy ('Your City – Your Space'), the Public Realm Masterplan for the City Core (The Heart of the City), the Grafton Street Quarter Public Realm Plan and forthcoming public realm plans such as those for the Parnell Square Cultural Quarter Development and the City Markets Area.*

SMT01 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).

SMT02 Improving the Pedestrian Network To improve the pedestrian network, and prioritise measures such as the removal of slip lanes, the introduction of tactile paving, ramps, raised tables and kerb dishing at appropriate locations, including pedestrian crossings, street junctions, taxi ranks, bus stops and rail platforms in order to optimise safe accessibility for all users.

SMT11 Pedestrian Network *To protect, improve and expand on the pedestrian network, linking key public buildings, shopping streets, public transport points and tourist and recreational attractions whilst ensuring accessibility for all, including people with mobility impairment and/or disabilities, older persons and people.*

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.*

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.

SMT14 City Centre Road Space *To manage City Centre road-space to best address the needs of pedestrians and cyclists, public transport, shared modes and the private car, in particular, where there are intersections between DART, LUAS and Metrolink and with the existing and proposed bus network.*

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.

SMT18 The Pedestrian Environment To continue to maintain and improve the pedestrian environment and strengthen permeability by promoting the development of a network of pedestrian routes including laneway connections which link residential areas with recreational, educational and employment destinations to create a pedestrian environment that is safe, accessible to all in accordance with best accessibility practice.

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.*

SMT22 Key Sustainable Transport Projects *To support the expeditious delivery of key sustainable transport projects so as to provide an integrated public transport network with efficient interchange between transport modes, serving the existing 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 Charlemont to Swords
- Bus Connects Core Bus Corridor projects
- Delivery of Luas to Finglas
- Progress and delivery of Luas to Poolbeg and Lucan

OTHER RELEVANT POLICIES

There are a significant number of City Development Plan policies with relevance to the delivery of transport in the city, including:

SC1 Consolidation of the Inner City *To consolidate and enhance the inner city, promote compact growth and maximise opportunities provided by existing and proposed public transport by linking the critical mass of existing and emerging communities such as Docklands, Heuston Quarter, Grangegorman, Stoneybatter, Smithfield, the Liberties and the North East Inner City and the south and north Georgian cores with each other, and to other regeneration areas.*

SC8 Development of the Inner Suburbs *To support the development of the inner suburbs and outer city in accordance with the strategic development areas and corridors set out under the Dublin Metropolitan Area Strategic Plan and fully maximise opportunities for intensification of infill, brownfield and underutilised land where it aligns with existing and pipeline public transport services and enhanced walking and cycling infrastructure.*

QHSN11 15-Minute City *To promote the realisation of the 15-minute city which provides for liveable, sustainable urban neighbourhoods and villages throughout the city that deliver healthy placemaking, high quality housing and well designed, intergenerational and accessible, safe and inclusive public spaces served by local services, amenities, sports facilities and sustainable modes of public and accessible transport where feasible.*

CEE12 Transition to a Low Carbon, Climate Resilient City Economy *To support the transition to a low carbon, climate resilient city economy, as part of, and in tandem with, increased climate action mitigation and adaptation measures.*

2.2.2.1.1 DEVELOPMENT PLAN ; STRATEGIC DEVELOPMENT AND REGENERATION AREAS

Strategic Development and Regeneration Areas (SDRAs) are identified in the Development Plan as areas capable of delivering significant quantum of homes and employment for the city. The proposed Core Bus Corridor passes within one SDRA as identified in the City Development Plan. For each SDRA a series of guiding principles are set out in the plan. It is noted that the Planning Report prepared as Appendix A2.1 of the EIAR erroneously refers to a SDRA from the previous Development Plan (SDRA 10, Dominick Street). It is considered that the following SDRAs have objectives/principles of note for the proposed Core Bus Corridor:

SDRA 10 – NEIC Connolly Moore Street

The NEIC SDRA has an area of 161ha and is located in the city centre just north of the River Liffey, extending from the historic Moore Street area, on its western side, to Docklands, on the east. It includes areas to the east of Dorset Street and extends to some areas north of the Royal Canal. A Local Area Plan is proposed to be prepared for this area during the life of the Development Plan.

The boundary of the SDRA overlaps with the proposed bus corridor works from Binn Bridge on the canal along Dorset Street Lower, Dorset Street Upper, and then the twin prongs of Frederick Street North/Parnell Square East/Cavendish Row, and Granby Row/Parnell Square West.

Among the guiding principles of relevance to the delivery of the Bus Connects proposal are:

- To reinforce the existing pedestrian spines identified in the Guiding Principles Map and to capitalise on these through targeted permeability interventions, increasing connectivity and stimulating pedestrian journeys throughout the area.
- To create a hierarchy of public open spaces including civic squares and parks, throughout the NEIC that are attractive, multi-functional, and accessible to local residents, workers and visitors. Associated with this will be an enhancement of existing open spaces. This approach will help to address the existing deficit in public open space within the SDRA.

The Guiding Principles map indicates public realm improvements to all four sides of Parnell Square; the route of Busconnects as one of several Core Pedestrian Spines; and Public Transport Hubs on both Parnell Square East and Parnell Square West, as well as between the junctions of Belvidere Road and North Circular Road (where Busconnects proposed retention of bus stops), and adjacent to the junction with Gardiner Street (where Busconnects proposes removing an existing bus stop).

Green Infrastructure

- To support the implementation of the projects identified in the North East Inner City Greening Strategy and seek to address the deficit of public open space it identifies. For other areas within the SDRA, to promote greening initiatives and the upgrading of existing open spaces.
- To implement the delivery of greening corridors identified in the Guiding Principles Map that that can also serve as high quality pedestrian and cycle routes and connect existing and planned public open spaces.
- To facilitate the reimagining of the Royal Canal as a key public amenity and biodiversity corridor.
- To create a new public garden as part of the regeneration of the convent buildings on Sean McDermott St. and as a central amenity within this planned hub.
- To investigate the removal of car parking spaces in front of the Rotunda Hospital building on Parnell Street, and the conversion of this area to a high quality publicly accessible open space appropriate to its unique setting.

Movement & Transport

- To strengthen the existing core pedestrian spine of the area as both the key movement corridor and also the location of existing and emerging public transport hubs, and to specifically target interventions such as densification and street upgrades towards streets with low footfall and regeneration potential.
- To deliver public realm improvements at Five Lamps/Charleville Mall, Moore St. Quarter, Parnell Square and also at the proposed Sean McDermott Street civic/community hub.
- To encourage development that provides interaction and vitality of permeability interventions identified in the Guiding Principles Map. Own door access to ground floor units to be provided along all routes as well as balconies at upper floor levels. All of these new/improved routes are required to be publicly accessible at all hours of the day, unless significant reasons require the contrary.
- To facilitate delivery of cycle routes identified in the NTA GDA Cycle Strategy.
- To work with the Bus Connects project in the NEIC area to help maximise improvements in public realm, green infrastructure and pedestrian and cycling infrastructure.

2.2.2.2. Area Specific Plans

There are no Local Area Plans along the route. As noted above, it is proposed to develop a Local Area Plan for SDRA 10 NEIC Connolly Moore Street during the life of the Development Plan. The Planning Report prepared as an Appendix (A2.1) to Chapter 2 of the EIAR refers to the Whitehall Framework Plan – this is a non-statutory plan from some 15 years ago. The Omni Shopping Centre is a Key Urban Village.

2.3 Departmental Reports

The following Dublin City Council Departments and Divisions submitted a report and their response has been incorporated into this submission:

- Environment and Transportation Department – including comments from Traffic, Roads, Public Lighting and Environmental Protection Divisions
- Archaeology Section
- Conservation Section
- Forward Planning Section
- City Architects Division
- City Parks, Biodiversity and Landscape Division

Additional comments from the various departments etc. are provided in Appendix 1.

2.4 Planning Assessment:

2.4.1 Planning Policy

In terms of Regional Policy, as set out in Section 2.2.1, the proposed scheme is supported by the RSES. BusConnects (of which the Proposed Scheme is a part) is identified as a key infrastructure project which will support the regional growth strategy for the Eastern and Midlands Region including the Dublin MASP area. It is considered that the proposed scheme will contribute and support continued improved integration of transport with land use planning and the delivery of improved high-capacity Core Bus Corridors will enable and support the delivery of both residential and economic development opportunities, facilitating the sustainable growth of Dublin City and its metropolitan area. The RSES not only seeks an improved and enhanced bus network but also places cycling at the core of its transport objectives.

At citywide planning level, the Dublin City Development Plan 2022-2028 sets out policies and objectives required to achieve its Core Strategy. The proposal has been considered with regard to this Core Strategy and the policies and objectives of the current Dublin City Development Plan and in particular the dual aspirations of delivering necessary transport infrastructure to facilitate compact growth while also protecting Natura designated sites.

2.4.2 Environmental Impact Assessment Report (EIAR)

A comprehensive EIAR is provided with the application documents examining the project under all relevant impacts and finds generally that the development would not adversely impact on existing environmental amenities. As An Bord Pleanála is the competent authority with regard to the acceptability or otherwise of the EIAR, it is not the role of Dublin City Council to comment on the acceptability or not of the EIAR and its findings but the content points generally to the development having negligible impact on the existing environment.

2.4.3 Natura 2000

The Habitats Directive and the Birds Directive list habitats and species which are considered to be important and in need of protection. These sites are referred to as European Sites. Sites designated for wild birds are termed Special Protection Areas (SPAs) and sites designated for natural habitat types or other species are termed Special Areas of Conservation (SACs). The network of European sites is referred to as Natura 2000.

A screening report has been prepared by the applicant which concludes that, having regard to the nature of the project and its potential relationship with all European sites within the zone of influence, and their conservation objectives, it is the professional opinion of the authors of this report that the application for approval for the proposed scheme does require a Stage Two Appropriate Assessment in respect of the 17 European sites (five SACs and 12 SPAs) and consequently the preparation of a Natura Impact Statement (NIS).

The Assessment of the Natura Impact Statement is a matter for the Board, as the competent authority.

2.4.4 Zoning and other designations

2.4.4.1 Land Use Zoning Objectives

In the current Dublin City Development Plan (2022-28) the area along the proposed route includes lands with the following zoning objectives: Z1 (residential), Z2 (residential conservation) Z3 (neighbourhood centres) Z4 (urban villages and key urban villages), Z5 (city centre), (Z8 Georgian Conservation Areas), Z9 (open space), Z11 (Waterways Protection), Z12 (Institutional Land (Future Development Potential) Z15 (Community and Social Infrastructure).

For the most part, the proposed scheme within the City Council area is situated on lands within the existing public road. Some of the tree-lined grass margins on the road on Drumcondra Road Upper and Drumcondra Road Lower are specifically zoned Z9 (open space).

The Dublin City Development Plan 2022-2028 defines a 'public service installation' as '*a building, or part thereof, a roadway or land used for the provision of public services. Public services include all service installations necessary for electricity, gas, telephone, radio, telecommunications, television, data transmission, drainage, including wastewater treatment plants and other statutory undertakers: bring centres, green waste composting centres, public libraries, public lavatories, public telephone boxes, bus shelters, etc. but does not include incinerators/waste to energy plants. The offices of such undertakers and companies involved in service installations are not included in this definition.*'

As defined above, the secondary elements associated with the proposed scheme, such as bus shelters, stops and real time information signage fall within the definition of public service installation.

Overall, is considered that the proposals would be compatible and consistent with the zoning objectives for the area.

2.4.4.2 Built Heritage Objectives

The corridor for the proposed Swords to City Centre Bus Connects scheme traverses the Zone of Archaeological Constraint for Recorded Monument DU018-020 (Historic City) on part of Dorset Street Lower, part of Frederick Street North, Granby Row, and Parnell Square East and Parnell Square West. This Recorded Monument DU018-020 (Historic City) is listed on the Record of Monuments and Places (RMP) and is subject to statutory protection under Section 12 of the National Monuments (Amendment) Act 1994. Further, the site in question is located within the Zone of Archaeological Interest in the current Dublin City Development Plan (2022-28).

Binn Bridge is a protected structure (RPS 908). Frank Flood Bridge (Drumcondra Bridge) over the Tolka River, is not a protected structure, but is rated as a regionally important structure by the NIAH. Granby Row, part of Frederick Street North, and Parnell Square, all fall into a red hatched conservation area, and part of Parnell Square falls into the O'Connell Street Architectural Conservation Area.

2.4.5 Impact on amenity

Dublin City Council is satisfied that the elements of the proposed development which fall within the Council boundary would not have any excessive or undue impact on the amenities of the area. There will be a degree of disruption in terms of traffic management during construction but thereafter there is unlikely to be adverse impact on existing amenities. There will be a need for sharing of space including kerbside space, which will need to be managed to ensure that there is no undue adverse impact on the ability of residents and visitors to access local services on foot or on the ability to achieve the '15-minute city'. Once complete, the proposed scheme will create attractive, functional and accessible places for people alongside the core bus and cycle facilities which will enhance the amenities of the area.

2.4.6 Strategic Observation from the Forward Planning Section of Dublin City Council

The Swords to City Centre Core Bus Corridor scheme is fundamental to achieving the strategic objectives envisaged in the *Dublin City Development Plan 2022-2028*, pertaining to: compact and sustainable urban growth; sustainable mobility and permeability; and placemaking, while significantly contributing towards climate action.

In general, the Proposed Scheme is supported by the high level policies in place the current Dublin City Development Plan 2022-2028

2.4.7 Environment and Transportation Department

2.4.7.1 General Comments

The Department is generally supportive of the improvements to bus and cycling infrastructure proposed in the overall context of encouraging a shift to sustainable mobility. In this regard the proposal generally aligns with the policies expressed in the Dublin City current and draft Development Plans.

Dublin City Council is obliged to consider the Proposed Scheme in the context of the vision and range of policies set out in the current and draft development plans with a view to safeguarding the city as a place in which to live, work, visit and do business.

Dublin City Council recognises that the bus is the most important mode of public transport in Dublin and this is best illustrated by the fact that in 2019, almost 160 million journeys were made by bus in the Dublin Region, representing 65% of all public transport trips in the Dublin area. In addition, the DCC/ NTA cordon count in 2019 showed that the bus was the single highest mode of transport crossing the canal, 30% of all trips, and the bus accounted for over half of all public transport trips into the city centre.

The commitment by the NTA within the BusConnects project to increase the level of priority afforded to the bus service is very much welcomed. The introduction of, for the most part, separated and segregated cycle ways is again welcomed as providing the opportunities:-

- To provide a better and safer cycling environment for all ages and abilities
- To help the bus maintain a steady speed and so achieve its journey times and even headways by removing bicycles from potentially being a source of delay in the bus lane.

2.4.7.2 Traffic Division

The Traffic Section is supportive of the integrated sustainable transport proposals and recognises the significant improvements that they will bring in terms of safe cycling measures and in enabling an efficient public transportation service along these routes.

It is essential on all BusConnects corridors to ensure that the bus service is given priority “The proposed scheme to operate on a managed headway basis”. Therefore, the corridor cannot be operated in isolation and must in fact be a managed corridor such that the DCC traffic control system is constantly managing requests for priority and has the necessary information to determine what level of priority is appropriate in order to maintain an even headway on the corridor.

The DCC centralised traffic control system has for a number of years been linked to the bus automatic vehicle location system via a bespoke software called DPTIM and this link provides details of the bus location, its journey pattern and if the bus is ahead or behind schedule. For the BusConnects project this system is being upgraded to link to the next Generation Automatic vehicle location system which will allow finer grain information to be transmitted to the DCC system for dynamic management of the corridor.

The modelling work which was carried out on the corridor using Vissim attempted to mimic the real life operation of a full corridor management system using an adaptive traffic control system and allows for a firm basis for how the corridor can be evaluated and to determine its benefits.

In practice DCC will utilise its adaptive traffic control system SCATS to undertake the required traffic management on the corridor to enable the public transport corridor to perform as per the requirements. Because of the use of a real world system, which has multiple inputs from the Bus AVL system, cycle and pedestrian detection as well as vehicle actuated sensors, the signals will be running multiple sets of timings across the day rather than a fixed set of timings and the use of this technology will allow improved corridor operation.

The design of this scheme in the Dublin City Council area is difficult and complex and has called for multiple interventions along the road network in order to achieve its objectives. The use of bus priority signals, turn bans and other interventions are all intended to alter the current traffic situation along the route and ensure that Public Transport walking and cycling can be prioritised over the private car.

It should be noted that this corridor needs to be considered as a whole and that the various different measures to prioritise public transport walking and cycling, need to be implemented in as full a manner as possible to avoid “watering down” the benefits of this scheme by making localised changes to the design.

Because of the nature of the turn bans and the use of signal controlled priority the deployment of Camera based bus lane enforcement will need to have been rolled out on this corridor before the full benefit of the scheme in terms of bus journey reliability can be achieved.

The enhanced data garnered by DCC from the next Generation AVL system and the next generation Bus priority system currently being specified will play a key role in how the corridor is dynamically managed to ensure that the bus journey times and headways are met.

This digital infrastructure along with the proposed civil infrastructure are both required for the corridor to meet its objectives.

2.4.7.2.1 Project Delivery Mechanism

This project is being undertaken by the NTA in the role of public transport regulator exercising the right to provide improvements to public transport infrastructure directly via Section 51 of the 1993 Roads Act. The NTA is taking over the role of the Road Authority for the purposes of obtaining planning permission for the corridors and the subsequent construction of the corridors will be undertaken directly by the NTA via their contractors.

Thus the planning and construction of these corridors takes more the form of the Light Rail process than for example the early Quality Bus Corridors, which were all developed and put in place directly by DCC.

2.4.7.3 ROADS DIVISIONS’ COMMENTS

This section of the Environment & Transportation report on the Swords Bus Connects Scheme has been prepared by the Roads Department. It includes technical input from Roads Design, Roads Construction, Roads Maintenance and Transportation Planning Sections, the remit of which covers design and construction phases through to maintenance and operational phases of the scheme as well as wider policy and planning considerations. The Roads Department is generally supportive of the scheme and its intention to improve bus and cycling provision. Having reviewed the application documentation, the department would like to highlight some matters which, with further consideration, could improve the scheme. The comments set out in the first instance are generally applicable to all the schemes. The Roads Department has in response to these matters developed a set of recommended standard conditions for attachment to all permissions granted which, once complied with, will facilitate engagement and agreement between DCC and the NTA at detailed design

and construction stages. Scheme specific comments are also highlighted below for An Bord Pleanála's consideration.

In general terms, Bus Connects proposes substantial improvements to bus and cycling infrastructure, with provision of additional signalised crossings for pedestrians along the routes. The schemes, including the Swords scheme, could be improved by making greater provision for pedestrians by ensuring sufficient and appropriate footpath widths based on pedestrian flows (with an absolute minimum 2m width) and also by ensuring pedestrian priority throughout the routes. There are recurring situations throughout the schemes where user priority is unclear, for example at bus stops and where cycle routes cross footpaths. Grade or physical separation between cycling facilities and footpaths is recommended and running cycle tracks through footpaths and pedestrianised zones should be avoided. Ensuring pedestrian priority is important particularly in the context of people with accessibility issues including visual impairments. Pedestrians, in accordance with all levels of policy, should be ensured priority through signage and other appropriate measures. A condition is recommended in this regard.

Another design feature of all schemes is the reallocation of kerbside space to buses and cyclists, the impact of which is the removal of potential kerbside loading and servicing. This activity is crucial for the general functional operation of the city and to the achievement of the 15 Minute City where people can walk and cycle to local shops and services. Safeguarding the ability of local services to operate is therefore imperative. The extent of loss of loading bays is not clearly quantified in the schemes, nor is the adequacy of alternative provision demonstrated. More information and clarity in this regard would provide comfort that the scheme will continue to support the operation of local businesses. In addition to loading facilities, on street parking is also affected including at commercial units. A condition regarding loading and parking is attached.

- Regarding the current scheme, location specific comments are provided below with reference to each drawing sheet number. However, it is considered important to highlight some recurring issues. Throughout the scheme design it is noted that trees and heritage features appear to be shown within footpaths, thereby causing obstructions and also, existing street furniture does not appear to be indicated throughout. In addition, it is noted that intended loading and parking areas appear narrow and that inadequate buffer space appears to be provided between parking/loading and cycle lanes. Bicycle parking spaces are proposed to be removed within the public footpath throughout the proposed scheme, especially near destinations (shops and services) and these should be reinstated.

Location Specific Comments

Sheets 1 -17 of 37

- No comment – Fingal County

Sheet 18 of 37

- Raised tables do not match existing levels on Swords Road.
- The cycle lane west of Swords Road varies in width.

- A proposed new Bus Stop is indicated at Swords Road and close to the junction with Santry Ave. However, a Bus Stop already exists at this location. The proposed Bus Shelter is located at the edge of the carriageway and lacks safety distance from the road.
- One proposed Bus Stop shelter at Coolock Lane is in front of a cycle lane without a pedestrian priority surface. This will cause safety concerns and conflict with cyclists.
- Sections of on-footpath cycle lanes are noted as narrow.

Sheet 19 of 37

- Cycle lane ramps onto the footpath at Santry Ave junction and Church Lane seems substandard in length.
- The proposed parallel parking at Swords Road appears to be narrow.
- The scheme lacks information on existing street furniture (poles, cabinets etc.). Existing Sheffield bicycle parking spaces are adjacent to the proposed parallel parking (in replacement of the Bus Stop), which aren't illustrated on the drawing. No relocation of the same are proposed.
- The 'Temporary Land Acquisition' illustrated behind the relocated bus stop at the west has an embankment with existing trees. If a retaining wall is required at this location this should be addressed.

Sheet 20 of 37

- The proposed raised table at the Omni Park Service entrance seems to be substandard in size.
- Green areas and carriageway surfaces are proposed in the front gardens of dwellings nos. 296, 298, 300, 302 & 304 as denoted within 'Temporary Land Acquisition'. In addition, a walkway exists between dwellings nos. 302 & 304. It is unclear how the impact on access and parking arrangements for residents will be managed and whether or not alternative arrangements are possible.

Sheet 21 of 37

- The 'Temporary land acquisition' boundary shows the acquisition of front gardens of houses along the west of Swords Road for the proposal of off-street parking spaces. The parking spaces appear to be substandard in width, and it is unclear how the impact on pedestrian access for residents will be maintained.
- A bus stop in front of dwellings nos. 5 & 6 appears to occupy most of the public footpath.
- The driveway entrance of dwelling no. 269 is located in close proximity to the junction of Shanowen Road with Swords Road, where a pedestrian crossing exists and a bus lane is proposed. It is unclear from the drawing where exactly the dishing for the vehicular entrance is located; therefore, safety concerns arise from the existing driveway at this location.
- Suggest the positioning of driveway entrances for House Nos. 277 - 301 Swords Road are grouped to reduce the extent of footpath dishing.
- Chainage A7400 - General arrangement drawings indicates "existing bus stop retained" however the drawings indicate a new bus shelter behind the footpath within the hardstanding area serving Nos. 256, 254 & 252. It is unclear from the drawings the changes proposed around this bus stop. Drawings indicate a Bus Shelter however table 4.12 of Chapter 4 of the EIAR, states that no bus shelter is proposed. This should be clarified.

- House No. 269 – there is an existing vehicular entrance serving the house which opens out onto the proposed Toucan crossing. Consideration should be given to relocating such an entrance away from the crossing in line with the temporary land acquisition on the site.
- House No. 275 – existing vehicular entrance is directly in line with the Bus Stop I.D 1622 shown on the drawings. Having regard to the potential provision of Kassel Kerbing serving the stop, how the bus stop and existing vehicular entrance functions should be clarified.

Sheet 22 of 37

- No comment.

Sheet 23 of 37

- A tree is proposed at the edge of the footpath at the junction of Swords Road with Shanrath Road which will create a pinch point at this location. A minimum 2m unobstructed footpath should be provided.
- The footpath on the east side of Shanrath Road is noted as narrow.
- Existing/Proposed trees are located on the southwest footpath of Swords Road. In all drawings, it is unclear which trees are being proposed from the existing ones.
- A section of the carriageway with c.1m wide is proposed between the grass verge area and the bus lane southwest of Swords Road. It is unclear why the bus lane has not been included in this carriageway section.
- The cycle lane at Glenfield Park is noted as narrow.
- The Glenfield Park Bus Stop appears to occupy the majority of the footpath where a cycle lane is proposed in front of the bus stop. In addition, the location of the cycle lane in front of a bus stop will cause conflict.
- It is not clear why two cycle ramps in the space of approx. 30m are located simultaneously, one after the other, in the same cycle lane at Shantalla Road.

Sheet 24 of 37

- A section of the carriageway with c.1m wide is proposed between the grass verge area and the bus lane west of Swords Road. It is unclear why the bus lane has not been included in this carriageway section.
- Proposed/existing trees located at a footpath in front of residential units at the west will create a pinch point at this location. A minimum 2m unobstructed footpath should be provided.
- The cycle lane is noted as narrow.
- The footpath to the west leading to the proposed toucan crossing is noted as narrow at sections of its extension.
- It is not clear whether the existing traffic bollards along Swords Road are retained restricting early entry into the bus lane to make the left-hand turn onto Collins Avenue (Eastbound).
- Chainage A8025 - proposed toucan crossing - It is unclear whether the access to the quiet street is changed or retained to facilitate cycling. Concern that cyclists will cross the Toucan and be required to dismount to pass through the entrance, impeding crossing times due to the restricted footpath along the Swords Road.

Sheet 25 of 37

- Proposed/existing trees located at the footpath to the north which create a pinch point at this location. A minimum 2m unobstructed footpath should be provided.
 - The proposed cycle lane is in very proximity to the on-street parking at the west-south, where car manoeuvring will create conflict with cyclists.
 - Left-hand turn at the two-way bicycle cross over from Collins Avenue onto the Swords Road (northbound) - It is not clear from the drawings whether vehicles or cyclists have priority. This should be clarified.
 - New location of Whitehall Church Outbound Bus Stop (ID: 100141) - It is not clear from the drawings the configuration of the standard bus shelter proposed and any changes to the pedestrian path.
- Relocated Bus Stop (ID: 212) – It is not clear from the drawings the configuration of the standard bus shelter proposed, the changes to the pedestrian path and changes to the entrances of House Nos. 488, 486 and 484. There is a concern that the retention of entrances around the bus stop would impede the ability of buses to setdown close to the kerb line. This should be clarified.

Sheet 26 of 37

- No comment.

Sheet 27 of 37

- It is unclear why the driveway entrance of Plunket College is within the 'Temporary land acquisition' boundary, as it seems no works are being proposed at this location.

Sheet 28 of 37

- The proposed two-way cycle lane is noted as narrow for one of the lanes.
- The road markings at the junction of Griffith Downs with Swords Road conflict with the proposed raised ramp.
- It is unclear how the proposed cycle lane arrangement at the junction of Swords Road with Griffith Avenue will operate. The two internal lanes will confuse cyclists. It is not clear how the signals will operate here to avoid pedestrian/cyclist conflict.
- An existing Bus Stop at the southwest is noted, occupying the majority of the footpath.

Sheet 29 of 37

- The proposed raised table at The Village is noted as narrow and conflicts with the pedestrian crossing.
- Sections of the proposed cycle lane at the northwest are noted as narrow. The same is also noted in front of dwellings no.s 128 and 126.
- Near Chainage A9500 – drawings indicate "existing parking upgraded" within the proposed inbound cycle and bus lane. This should be clarified.

Sheet 30 of 37

- The proposed Raised Tables to the east appear inconsistent about Swords Road levels.
- Cycle lane alignments are noted as inconsistent where bus stops exist.
- The existing Bus Stop in front of dwellings no.s 36 and 34 are noted as occupying the majority of the footpath.

Sheet 31 of 37

- It is unclear if the cycle lane arrangement at the junction of Swords Road with Milmount Avenue/Richmond Road is proposed to be traffic controlled for cyclists. It is not clear how the signals will operate here to avoid pedestrian/cyclist conflict.
- Cycle lanes are noted as narrow at sections along Swords Road and Drumcondra Road Lower.
- A parallel accessible parking space is proposed near the junction of Botanic Ave with Drumcondra Road Lower, which could conflict with/create safety concerns at this location.
- Current operators deliver along the Drumcondra road at AIB / Kennedy's Public House. In combination with the relocated accessible car parking space from Drumcondra Rd Lower to Botanic - consideration should be given to additional loading space adjacent to the relocated accessible space.

Sheet 32 of 37

- The proposed parking arrangement and existing Bus Stop relocated east of Drumcondra Road Lower is in close proximity to the cycle lane creating conflict between cars manoeuvring and cyclists.

Sheet 33 of 37

- Cycle lanes are noted as narrow at sections along Drumcondra Road Lower.
- The proposed cycle lanes are in very close proximity to proposed loading bays/parking spaces where a car manoeuvring will create safety concerns with cyclists.

Sheet 34 of 37

- Cycle Lanes at Belvidere Road are noted as narrow.
- Trees are proposed within the footpath at Belvidere Road, North Circular Road and Synott Place which will create a pinch point at these locations. A minimum 2m unobstructed footpath should be provided.
- Cycle lanes are noted as narrow at sections along Dorset Street Lower.
- Cycle lanes design at junctions should include the full extension of the radii as an extension of the proper cycle lanes.
- It is unclear if the cycle lanes at the junction of Dorset Street Lower with North Circular Road will be phased controlled. It is not clear how the signals will operate here to avoid pedestrian/cyclist conflict.
- Raised Tables are noted in places; however, these do not appear to be denoted as ramps with the normal ramp symbols.

Sheet 35 of 37

- Cycle lanes design at junctions should include the full extension of the radii as an extension of the proper cycle lanes.
- Cycle lanes are noted as narrow on sections of Dorset Street Upper.
- A Bus Stop is located in an area where pedestrians do not have priority in front of dwelling no. 8 at Dorset Street Lower.
- A raised table is noted in place. However, this does not appear to be denoted as a ramp with the normal ramp symbols.
- The indicated "No Right Turn" Signage at the junction of Frederick Street North and Dorset Street Upper is not in place as shown in the drawing.

Sheet 36 of 37

- Cognisance should be taken of the permitted public realm scheme along Parnell Square North which will be delivered in association with the permitted library development.
- Raised Tables are noted in places; however, these do not appear to be denoted as ramps with the normal ramp symbols.

Sheet 37 of 37

- Cycle lanes are noted as narrow.

2.4.7.4 Environmental Protection Division

Dublin City Development Plan 2022-2028, Chapter 9 identifies the need for Sustainable Environmental Infrastructure as part of any development in the city. The criteria listed in Chapter 9 are linked to the other major environmental themes within the Plan specifically in relation to Climate Change, Green Infrastructure, Open Space and Recreation, and Sustainable communities. The principles of Sustainable Drainage Systems (SuDS) should be integrated with all other environmental aspects of a project, using best practice solutions. DCC requires this softer engineered approach to be used to manage surface water at source as it is a greener, more environmentally effective approach for managing stormwater.

Overall Catchment drawings were omitted from the submission, yet they are referred to throughout the drawings suite. The design is incomplete without the correct discharge information relating to outfalls. There are numerous typographical and drafting errors in the drawings submitted.

The key requirements for this development from a surface water/drainage/flood management perspective are outlined as follows: This development must comply with the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0 (available from www.dublincity.ie Forms and Downloads). In particular:

- Continuous kerbs incorporating drainage, as outlined in Figure 2, Page 3 in Appendix K Drainage Design Basis Document, are not accepted by DCC Drainage Planning, Policy and Development.
- Enclosed drainage channels such as slot drains or “ACO” drains are not accepted by Drainage Planning, Policy and Development.
- The hybrid gully outlined in Section 1.1.3, Page 4 in the BusConnects - Road run-off collection gullies Technical Paper is not accepted by DCC Drainage Planning, Policy and Development. The use of narrow profile gullies as previously agreed is welcome.

The development shall incorporate Sustainable Drainage Systems in the management of surface water, providing an integrated approach with the landscaping proposals. Full details of these shall be agreed in writing with DCC Drainage Planning, Policy and Development Control prior to commencement of construction. Soft landscaping should be considered before hard landscaping. The SuDS design should refer to the new Dublin City Council Sustainable Drainage Design and Evaluation Guide published in 2021.

The detailed drainage design shall be agreed in writing with DCC Drainage Planning, Policy and Development prior to commencement. It shall be in accordance with the requirements set out in the Greater Dublin Regional Code of Practice for Drainage Works. Surveys on the location and condition of surface water infrastructure sewers, both pre and post development, shall be carried out by the developer and any damage rectified. Any diversions shall be agreed in writing, prior to commencement, with Drainage Planning, Policy and Development Control. Details on proposed connection locations to the surface water network and flow discharges shall also be agreed.

The NTA shall confirm in writing to Drainage Planning, Policy and Development Control that the development has been designed such that the risk of flooding to the development has been reduced as far as is reasonably practicable, and that the proposals do not increase the risk of flooding to any adjacent or nearby area. The effect of climate change on flooding, +20% rainfall and 0.5m sea level rise should be allowed for in calculations.

Any changes in ground profile shall be modelled to demonstrate no increase in flood risk and to reduce it where reasonably possible.

Pluvial flood risk shall be assessed at all locations along the route (not just where sections are 150m long). It should not be increased anywhere and should be reduced where possible. No pluvial flooding for 30 year flood scenario is welcome but needs to be connected to new SuDS/GI features rather than our already overloaded network.

The NTA must demonstrate that this development passes the three stages of the SFRA Justification Test, particularly for tidal and fluvial flooding.

New compensatory SuDS measures should be close to any green areas lost. In particular, the loss of existing large trees will increase pluvial flood risk unless replaced with equal size or replacement SuDS/GI features again close to where they are lost.

Flow control manholes to be clearly identified throughout the design as it would allow a better understanding of the design and how the attenuation is proposed to work.

The following more detailed comments shall be addressed:

1. Ch A6500 Is this design proposal to construct the oversized pipes over the existing network or to intercept the network, further explanation and details required.
2. Ch A6650, design clarification around this area and how the interception of the existing network is proposed to work. Is the storage volume sufficient for the area?
3. Flow direction of the pipe in excess of the 90 degree max as per design requirements.
4. Ch A6770 Outfall and flow control device location missing.
5. Ch A6750 – A7000, Design to include catchment description, detail on the volumes required / provided and proposed flow rates.
6. Ch A7000 – A7450, Design to include catchment description, outfall chamber, and detail on the volumes required / provided and proposed flow rates.

7. Ch A7650 Detail on the additional permeable and impermeable areas to be provided here and the proposed drainage?
8. Ch A7650 – A8000 Could this design include tree pits along the road where the proposed green area is? NBS should be employed where possible.
9. Ch A7975, Ch A8510, Flow control device, chamber and Flow rates omitted from the design.
10. Ch A9275 Could NBS be employed here rather than hard engineering solutions. Flow rate to be included along with flow control chamber.
11. Ch A10000, Design seems overly complex, what is the rationale for this.
12. Ch A10150, this design seems to be incomplete with manholes etc. not shown on the piped network, additional pipes shown not connected to anything, distance between manholes in excess of the design recommendations and no flow control device or flow rate shown.

2.4.7.5 Water Framework Directive

The proposed Swords to City Centre Core Bus Corridor Scheme transverses the catchment of the River Tolka within the Dublin City Council administrative area. Albeit all waterbodies are subject to the European Union Water Framework Directive, this waterbody is specifically highlighted in the River Basin Management Plan (RBMP) as 'Priority Area for Action' with a requirement to protect and restore the river status to a 'good' designation or better, in addition to being protected under Article 4 of the WFD. Currently the Tolka River is of 'poor' status.

Dublin City Council is obliged to achieve a water quality status of 'good' or better with all priority waterbodies by December 2027. To support our achievement of our legislative obligations, the proposal should not cause a deterioration of the status of any waterbody which it is contiguous with downstream and furthermore should not jeopardise the attainment of good ecological and good surface water chemical status, in accordance with our obligations. In particular, all surface water that discharges from the curtilages of the Swords to City Centre CBC Scheme proposal into existing or proposed waterbodies should be intercepted and treated, using nature based solutions wherever possible.

Where possible, drainage within the curtilage of this project should be segregated, and infrastructure for discharging surface water into existing surface water sewers should be implemented.

Good Status includes both good ecological and chemical status as determined by the Environmental Protection Agency against an established set of assessment criteria. The latest status indicators may be viewed at www.catchments.ie.

In the Environmental Impact Assessment Report, Chapter 13, we welcome the acknowledgement that urban runoff is a significant pressure on the receiving waters within the project area. However, we do not agree or accept the report's argument in regard to the 'Sensitivity of Receptors', section 13.2.4.2. The report includes an extract from the National Roads Authority, which seems to indicate that the lower the status of a water body, the less sensitive the receptor is. This insinuates that a water body, which has not yet achieved the legislative requirements set out in the EU Water Framework Directive ('Good' ecological status), may receive surface water run-off of a lower quality than 'Good'. We maintain the EU Water Framework Directive takes priority and overrides the National Road Authority and the UK Environment Agency as referenced within section 13.2.4.2 of the report.

As a Member State, Ireland is required to improve the status of ALL water bodies. Chapter 13 goes on to state that the implementation of the 3rd Cycle River Basin Management Plan should address the pressures on the receiving waters, including urban runoff. However, given the scale of the proposed project and our legal requirement to meet the EU WFD obligations by 2027, the project needs to support and be consistent with the delivery of that 3rd Cycle RBMP. While the local authority is responsible for overseeing the implementation of programmes of measures, all stakeholders need to be involved in delivering the RBMP, including the proposed project. Urban runoff is a significant urban pressure, and the Bus Connects schemes are the single biggest planned intervention to key, heavily trafficked, commuter routes into the city.

The developer shall provide an evidence-based assessment of the impact, if any, of the proposed scheme on the water quality status of both rivers within the curtilage of the proposed project, including both ecological and chemical status.

2.4.7.6 Flood Prevention

At detailed design stage more detail will need to be provided and agreed on:

- Cross sections for crossings of the Tolka River.
- Plan for dealing with local pluvial flooded areas anywhere where flood depths on the carriageway are predicted to be above 300mm.
- The new cycle and pedestrian bridge over the Tolka River requires more detail to be shown and agreed. A section 50 from the OPW is required.
- Climate Change Flood Adaption Plan for river crossings and other flooded areas.
- FRA should give more detail on Tolka river crossing.

2.4.8 Archaeology Section Comments

Background

The corridor for the proposed Swords to City Centre Bus Connects scheme traverses the Zone of Archaeological Constraint for Recorded Monument DU018-020 (Historic City) on Frederick Street North, and at the junction of Dorset Street Upper and Frederick Lane North. This Recorded Monument DU018-020 (Historic City) is listed on the Record of Monuments and Places (RMP) and is subject to statutory protection under Section 12 of the National Monuments (Amendment) Act 1994.

Furthermore, the proposed scheme traverses the Historic City as depicted in the Dublin City Development Plan (see Map L). It is the policy of the Dublin City Development Plan 2022-8 (Section 11.5.5; BHA26) to protect and preserve monuments:

1. To protect and preserve Sites and Zones of Archaeological interest which have been identified in the Record of Monuments and Places and the Historic Environment Viewer (www.archaeology.ie) and all wrecks over 100 years old including those in the Shipwreck Inventory of Ireland.
2. To protect archaeological material in situ by ensuring that only minimal impact on archaeological layers is allowed, by way of re-use of standing buildings, the construction of light buildings, low impact foundation design, or the omission of basements (except in exceptional circumstances) in the Monuments and Places listed on the statutory Record of Monuments and Places (RMP) as established under Section 12 of the National Monuments (Amendment) Act 1994.
3. To seek the preservation in situ (or where this is not possible or appropriate, as a minimum, preservation by record) of all archaeological monuments included in the Record of

Monuments and Places; all wrecks and associated objects over 100 years old and of previously unknown sites, features and objects of archaeological interest that become revealed through development activity. In respect of decision making on development proposals affecting sites listed in the Record of Monuments and Places, the council will have regard to the advice and/or recommendations of the Department of Housing, Heritage and Local Government.

4. Development proposals within the Record of Monuments and Places (RMP) as established under Section 12 of the National Monuments (Amendment) Act 1994, notification of sites over 0.5 hectares size with potential underwater impacts and of sites listed in the Dublin City Industrial Heritage Record, will be subject to consultation with the City Archaeologist and archaeological assessment prior to a planning application being lodged.

5. To preserve known burial grounds and disused historic graveyards. Where disturbance of ancient or historic human remains is unavoidable, they will be excavated according to best archaeological practice and reburied or permanently curated.

6. Preserve the character, setting, and amenity of upstanding and below ground town wall defences.

7. Development proposals in marine, lacustrine and riverine environments and areas of reclaimed land, shall have regard to the Shipwreck Inventory maintained by the Department of Housing, Local Government and Heritage and be subject to an appropriate level of archaeological assessment.

8. To have regard to national policy documents and guidelines relating to archaeology and to best practice guidance published by the Heritage Council, the Institute of Archaeologists of Ireland and Transport Infrastructure Ireland.

It is the policy of the Dublin City Development Plan 2022-8 (Section 11.5.3; BHA16) to:

Have regard to the city's industrial heritage and Dublin City Industrial Heritage Record (DCIHR) in the preparation of Local Area Plans (LAPs) and the assessment of planning applications. To review the DCHIR in accordance with Ministerial Recommendations arising from the National Inventory of Architectural Heritage (NIAH) survey of Dublin City. The Dublin City Industrial Heritage Record survey makes recommendations for sites to be added to the list of Protected Structures in the life of the plan and it should be consulted prior to the lodgement of any planning application.

Submitted EIAR

The archaeological and cultural heritage impacts of the construction phase and operational phase associated with the construction and operation of the Swords to City Centre Core Bus Corridor Scheme are assessed in Chapter 15 of the Environmental Impact Assessment Report (EIAR), which was prepared by Lisa Courtney and Dr Claire Crowley of Courtney Deery Archaeology Ltd. This report provides a desk study of published and unpublished documentary and cartographic sources, supported by a field survey. The findings of the report are summarised below.

The R132 Drumcondra/Swords Road was an important route northward in the medieval period known as the Slighe Mhídhluachra, one of the five principal roads of early medieval Ireland, passed from Dublin to Swords and northward to Ulster.

There is one national monument along the Proposed Scheme; The Parnell Monument (SMR DU018-42), which is located c. 10m from the boundary of the Proposed Scheme. No works will take place within 15m of the monument and there will be no impact on the national monument.

There are five archaeological heritage assets near the route that are shown on the Records of Monuments and Places / Sites and Monuments Record (one being the Historic City of Dublin Zone of Archaeological Potential), three on the Dublin City Industrial Heritage Record, 8 cultural heritage

features, and 22 non-designated archaeological sites that have the potential to be impacted within the Proposed Scheme.

One recorded site, a burial ground (RMP DU018-020495), is located within the Proposed Scheme and within the Historic City of Dublin Zone of Archaeological Potential (DU018-020). It comprises a possible Viking cemetery which was discovered in the 18th century during the construction of the Rotunda Hospital and the laying out of the adjacent streets. The EIAR states that there is a large area of archaeological potential associated with this RMP which extends across the Proposed Scheme and is reflected within the ZAP for the Historic City of Dublin (RMP DU018-020) in this area (p. 15).

Chapter 15 of the EIAR also discusses sites listed on the Dublin City Industrial Heritage Record (DCIHR) and sites of Cultural Heritage importance. A tramway ran from Drumcondra Road at the corner of Griffith Avenue to Parnell Square, and provided the Numbers 11, 16 and 17 services to Rathfarnham and Clonskeagh (DCIHR 18-07-027). The subsurface remains of a flour mill (DCIHR 18-03-034), which once stood where Millmount Avenue now joins Drumcondra Road and is within the proposed scheme is also noted. There are no recorded archaeological monuments or sites listed on the DCIHR within or in the vicinity of the proposed construction compounds SW1 to SW5.

Section 15.4.1 of the EIAR concludes that the main potential impacts on archaeology and cultural heritage could arise from the following construction:

- Pavement construction, repairs, and reconstruction works;
- Road resurfacing works;
- Any excavations of soil, including landscaping works and ground disturbance for utility works
- Any ground disturbance for utility works.

The EIAR proposes that all subsurface archaeological and cultural heritage issues should be resolved by archaeological mitigation during the pre-construction phase and/or construction phase, in advance of the operational phase, through one or more of the following mitigations:

- Preservation by record (archaeological excavation);
- Preservation in situ;
- Preservation by design;
- Archaeological monitoring.

Section 15.5 of the EIAR addresses the proposed archaeological mitigation measures as follows:

- Archaeological mitigation measures can avoid, prevent, reduce or offset negative effects and these are achieved by preservation in situ, by design and/or by record.
- The NTA will procure the services of a suitably qualified archaeologist as part of its Employer's Representative team administering and monitoring the works.
- The appointed contractor will make provision for archaeological monitoring to be carried out under licence to the DHLGH and the NMI, and will ensure the full recognition of, and the proper excavation and recording of, all archaeological soils, features, finds and deposits which may be disturbed below the ground surface. All archaeological issues will be resolved to the satisfaction of the DHLGH and the NMI. The appointed contractor will ensure that the archaeologist will have the power to inspect all excavation to formation level for the proposed works and to temporarily halt the excavation work, if and as necessary, having conferred with the NTA. They will be given the power to ensure the temporary protection of any features of archaeological importance identified. The archaeologist will be afforded sufficient time and resources to record and remove any such features identified in accordance with the licensing requirements agreed.

- Archaeological excavation ensures that the removal of any archaeological soils, features, finds and deposits is systematically and accurately recorded, drawn and photographed, providing a paper and digital archive and adding to the archaeological knowledge of a specified area (i.e. preservation by record). As archaeological excavation involves the removal of the archaeological soils, features, finds and deposits, following this mitigation measure there is no further impact on the archaeological heritage.
- In the case of cellars, coal cellars and/or basements, the appointed contractor in consultation with the archaeologist engaged by them will make provision for a geodetic survey and recording of each individual structure which will be subject to impact. This survey and recording will be carried out in advance of any construction works on the cellar, coal cellar and/or basement.
- The appointed contractor will make provision to allow for archaeological monitoring, inspection and excavation works that may arise on the site during the Construction Phase.
- An experienced and competent licence-eligible archaeologist will be employed by the appointed contractor to advise on archaeological and cultural heritage matters during construction, to communicate all findings in a timely manner to the NTA and statutory authorities, to acquire any licenses/ consents required to conduct the work, and to supervise and direct the archaeological measures associated with the Proposed Scheme.
- Licence applications are made by the licence-eligible archaeologist to the National Monuments Service at the DHLGH. In addition to a detailed method statement, the applications must include a letter from the NTA that confirms the availability of adequate funding. There is a prescribed format for the letter that must be followed.
- Other consents may include a Detection Device licence to use a metal-detector or to carry out a non-invasive geophysical survey.
- A construction schedule will be made available to the archaeologist, with information on where and when the various elements and ground disturbance will take place.
- As part of the licensing requirements, it is essential for the client to provide sufficient notice to the archaeologist(s) in advance of the construction works commencing. This will allow for prompt arrival on site to undertake additional surveys and to monitor ground disturbances. As often happens, there may down time where no excavation work is taking place during the construction phase. In this case, it will be necessary to inform the archaeologist/s as to when ground-breaking works will recommence.
- In the event of archaeological features or material being uncovered during the Construction Phase, all machine work will cease in the immediate area to allow the archaeologist/s time to inspect and record any such material.
- Once the presence of archaeologically significant material is established, full archaeological recording of such material is recommended. If it is not possible for the construction works to avoid the material, full excavation will be recommended. The extent and duration of excavation will be advised by the client's archaeologist and will be a matter for discussion between the NTA and the licensing authorities.
- Secure storage for artefacts recovered during the course of the monitoring and related work will be provided by the appointed contractor.
- As part of the licensing requirement and in accordance with the funding letter, adequate funds to cover excavation, post-excavation analysis, and any testing or conservation work required will be made available.
- During the construction all machine traffic must be restricted as to avoid any newly revealed archaeological or cultural heritage sites and their environs. Materials management will be in operation to ensure no damage to a site of archaeological interest

The EIAR states that archaeological monitoring (as defined in section 15.5.1) under licence will take place, where any preparatory ground-breaking or ground reduction works are required (as defined in

section 15.4.1), at all sites of archaeological and cultural heritage along the proposed route, including National Monuments, Recorded Monuments and sites listed in the DCIHR. It is in these areas that there is a possibility to disturb intact archaeological layers and material. Licensed archaeological excavation, in full or in part, of any identified archaeological remains (preservation by record) or preservation in situ will be undertaken

Recommendations

The Archaeology Section of Dublin City Council concurs with the findings of the archaeological assessment in the EIAR and supports the proposed mitigation measures in it.

Recommended Conditions

These are set out in the Appendix below.

2.4.9 Conservation Section Comments

Introduction

The following high-level architectural heritage assessment has been carried out by the Conservation Section in the context of the Dublin City Development Plan 2022 – 2028, other key policy documents and best conservation practice. It is submitted that the following policies and provisions in particular should be taken into account in the consideration of all proposed routes and their impacts on the architectural and built heritage of the city:

Dublin City Development Plan 2022 – 2028

Chapter 11 – Built Heritage and Archaeology, 11.1 Introduction, *'It is recognised that the city's built heritage contributes significantly to the collective memory of its communities and to the richness and diversity of its urban fabric. It is key to the city's character, identity and authenticity and vital social, cultural, and economic asset for the development of the city.'*

The city's historic buildings, streetscape villages, Georgian terraces and squares, Victorian and Edwardian architecture, industrial heritage, institutional landmarks, modernist buildings of the 20th century, urban core and the Medieval City, together with its upstanding monuments and buried archaeology contribute to its local distinctiveness and help create a strong sense of place for citizens and visitors to the city and its neighbourhoods.'

Section 11.5.1 Curtilage of a Protected Structure states *'The curtilage of a protected structure is often an essential part of the structure's special interest. In certain circumstances, the curtilage may comprise a clearly defined garden or grounds, which may have been laid out to complement the design or function.'*

It is the Policy of Dublin City Council:

BHA2: Regarding Development of Protected Structures:

'That development will conserve and enhance Protected Structures and their curtilage and will:

- a) Ensure that any development proposals to protected structures, their curtilage and setting shall have regard to the Architectural Heritage Protection Guidelines for Planning Authorities (2011) published by the Department of Culture, Heritage and the Gaeltacht.*
- b) Protect structures included on the RPS from any works that would negatively impact their special character and appearance.*
- e) Ensure that the form and structural integrity of the protected structure is retained in any development and ensure that new development does not adversely impact the curtilage or the special character of the Protected Structure.*

- h) Protect and retain important elements of built heritage including historic gardens, stone walls, entrance gates and piers and any other associated curtilage features.*
- i) Ensure historic landscapes, gardens and trees (in good condition) associated with the protected structures are protected from inappropriate development.'*

Section 11.5.2 Architectural Conservation Areas and Conservation Areas states: *'The Planning and Development Act, 2000 (as amended), provides the legislative basis for the protection of Architectural Conservation Areas (ACAs). Under the Act, an ACA is defined as a place, area, group of structures or townscape that is of special architectural, historical, archaeological, artistic, cultural, scientific, technical, social interest or value or contributes to the appreciation of protected structures.*

Architectural Conservation Areas (ACAs) are designated in recognition of their special interest or unique historic and architectural character and important contribution to the heritage of the city. This character is often derived from the cumulative impact of the area's buildings, their setting, landscape and other locally important features which developed gradually over time...

The protected status afforded by inclusion in an ACA only applies to the exterior of structures and features of the streetscape.'

It is the Policy of Dublin City Council:

BHA7: *Regarding Architectural Conservation Areas:*

- a) To protect the special interest and character of all areas which have been designated Architectural Conservation Areas (ACA). Development within or affecting an ACA must contribute positively to its character and distinctiveness, and take opportunities to protect and enhance the character and appearance of the area and its setting, wherever possible. Development shall not harm buildings, spaces, original street patterns, archaeological sites, historic boundaries or other features, which contribute positively to the special interest of the ACA.*
- d) Seek the retention of all features that contribute to the character of an ACA including boundary walls, railings, soft landscaping, traditional paving and street furniture.*

'All trees which contribute to the character and appearance of an Architectural Conservation Area, in the public realm, will be safeguarded, except where the tree is a threat to public safety, prevents universal access or requires removal to protect other specimens from disease.'

It is the Policy of Dublin City Council:

BHA8: *Regarding Demolition in an ACA:*

'There is a presumption against the demolition or substantial loss of a structure that positively contributes to the character of the ACA except in exceptional circumstances where such loss would also contribute to a significant public benefit.'

Section 11.5.3 Z2 and Z8 Zonings and Re-Hatched Conservation Areas

'The Z8 Georgian Conservation Areas, Z2 Residential Conservation Areas and red-lined Conservation Areas are extensive throughout the city. Whilst these areas do not have a statutory basis in the same manner as protected structures or ACAs, they are recognised as areas that have conservation merit and importance and warrant protection through zoning and policy application.

...The special interest/value of Conservation Areas lies in the historic and architectural interest and the design and scale of these areas. Therefore, all of these areas require special care in terms of development proposals. The City Council will encourage development which enhances the setting and character of Conservation Areas.

As with Architectural Conservation Areas, there is a general presumption against the development which would involve the loss of a building of conservation or historic merit within the Conservation Areas or that contributes to the overall setting, character and streetscape of the Conservation Area. Such proposals will require detailed justification from a viability, heritage and sustainability perspective.'

It is the Policy of Dublin City Council:

BHA9: *Regarding Conservation Areas, enhancement opportunities may include:*

'3. Improvement of open spaces and wider public realm and reinstatement of historic routes and characteristic plot patterns.'

It is the Policy of Dublin City Council:

BHA10: *Regarding Demolition in a Conservation Area:*

'There is a presumption against the demolition or substantial loss of a structure that positively contributes to the character of the Conservation Area, except in exceptional circumstances where such loss would also contribute to a significant public benefit.'

It is the Policy of Dublin City Council:

BHA15: *Regarding Twentieth Century Buildings and Structures:*

a) 'To encourage the appropriate development of exemplar twentieth century buildings and structures to ensure their character is not compromised.'

It is the Policy of Dublin City Council:

BHA16: *Regarding Industrial Heritage:*

a) 'To have regard to the city's industrial heritage and Dublin City Industrial Heritage Record (DCHIR) in the preparation of Local Area Plans and the assessment of planning applications...'

Section 11.5.3 Protection of Historic Ground Surfaces, Street Furniture and Public Realm

'Dublin is fortunate to still retain impressive areas of historic street surfaces such as granite kerbing, granite pavement flags and granite and/or diorite setts, mainly but not entirely situated in the city centre. These along with other important historic features in the public realm such as milestones, city ward stones, street furniture, water troughs, post boxes, lampposts and railings make a special contribution to our built heritage. These items are often an integral part of the urban landscape or provide significant historic references which greatly contribute to the character of an area, especially where they complement the architectural features of protected structures, Architectural Conservation Areas and Z2, Z8 and Red-Hatched Conservation Areas.'

It is the Policy of Dublin City Council:

BHA18: *Regarding Historic Ground Surfaces:*

a) 'To protect, conserve and retain in situ historic elements of significance in the public realm including milestones, jostle stones, city ward stones, bollards, coal hole covers, gratings, boot scrapers, cast iron basement lights, street skylights and prisms, water troughs, street furniture, post boxes, lampposts, railings and historic ground surfaces including kerbs, pavement flags and setts and to promote conservation best practice and high standards for design, materials and workmanship in public realm improvements within areas of historic character, having regard to the national Advice Series on 'Paving: The Conservation of Historic Ground Surfaces (2015).'

It is the Policy of Dublin City Council:

BHA24: *Regarding Reuse and Refurbishment of Historic Buildings:*

'Dublin City Council will positively encourage and facilitate the careful refurbishment of the historic built environment for sustainable and economically viable uses and support the implementation of the National Policy on Architecture as it relates to historic buildings, streetscapes, towns and villages, by

ensuring the delivery of high quality architecture and quality place-making and by demonstrating best practice in the care and maintenance of historic properties in public ownership.'

It is the Policy of Dublin City Council:

BHA26: *Regarding Archaeological Heritage:*

(5) 'To preserve known burial grounds and disused historic graveyards. Where disturbance of ancient or historic human remains is unavoidable, they will be excavated according to best archaeological practice and reburied or permanently curated.

(6) Preserve the character, setting and amenity of upstanding and below ground town wall defences.'

Dublin City Tree Strategy 2016 – 2020

The Conservation Section would like to highlight that trees contribute significantly to the streetscape and character of the historic areas of the city, including the character and setting of Protected Structures, Architectural Conservation Areas and 'red-hatched' Conservation Areas, as provided in the Dublin City Development Plan 2022-2028.

As noted in the Dublin City Tree Strategy 2016 – 2020, 'Dublin City's identity is expressed in a pattern of tree lined streets and open spaces. Trees form an integral part of the urban fabric of Dublin City whether they are in public or private ownership... Trees contribute to urban design and can help define spaces... They can also create areas of particular urban character and ambience as the use of the term Dublin's leafy suburbs suggests and they provide a verdant frame for our historic buildings.'

Section 3.6.1 'Private trees whether in gardens, residential or business premises make a significant contribution to the visual amenity of Dublin City and provide an important habitat for wildlife. They may act as landmarks, identify a particular location, provide a foil to the urban townscape and impart a sense of character to the area...'

The Conservation Section recommends that all mature and historic trees across the Bus Connects proposal and particular in close proximity to Protected Structures and within ACAs, Conservation Areas and areas zoned Z2 and Z8 in the Dublin City Council Development Plan 2022-2028 are retained and protected as far as practically possible. Where there is an unavoidable loss of historic trees, the NTA shall ensure that these are replaced with new semi mature trees to the satisfaction of DCC.

Architectural Heritage Protection Guidelines for Planning Authorities (2011)

Consideration of proposals affecting boundary features:

13.4.3 *'Proposals to remove or alter boundary features could adversely affect the character of the Protected Structure and the designed landscape around it.... such alterations can have a detrimental effect on the character of a Protected Structure and on the character of an ACA.'*

13.4.4 *'...the cumulative effect on the character of the street or area of a series of incremental changes may not be acceptable.'*

p.197 *'...Gardens are generally a combination of built features and planting. Regardless of its size, a garden can make an important contribution to the character and setting of a Protected Structure...'*

14.4.1 Street Furniture and Paving

'An item of street furniture may be protected by being included in the RPS in its own right where it is special or rare; as part of the curtilage of a Protected Structure; or as part of an ACA. Such items could include lamp standards, seats and benches, bollards, railings, street signs, iron signposts, free standing or wall mounted post boxes, telephone kiosks, horse troughs, water pumps, drinking fountains, jostle stones, milestones, paving, kerbstones, cobbles and setts, pavement lights, coal hole covers, weighbridges, statues and other monuments.'

Department of Culture, Heritage and the Gaeltacht – Technical Advice Series

The Technical Advice Documents on *Paving – the conservation of historic ground surfaces* and *Iron – the repair of wrought and cast ironwork* should be used to guide any interventions to historic boundary railings and paving arising from the proposed works.

Assessment

The potential impact of the proposed development on the architectural heritage of this route and on the following categories in particular, has been subject to a relatively high-level assessment:

- Protected Structures and Proposed Protected Structures and their settings
- Buildings and other structures (post boxes/milestones etc.) and historic landscapes included on the National Inventory of Architectural Heritage (NIAH)
- Structures included in the Dublin City Industrial Heritage Record Survey (DCIHR)
- Other unprotected structures that contribute positively to the architectural heritage and character of streetscapes
- Architectural Conservation Areas (ACAs) and Conservation Areas
- Lands zoned Z2 in the Dublin City Development Plan 2022-2028, which aims to 'protect and / or improve the amenities of residential conservation areas'
- Lands zoned Z8 in the Dublin City Development Plan 2022-2028, which aims 'to protect the existing architectural and civic design character, and to allow only for limited expansion consistent with the conservation objective'
- Historic Paving and Kerbing

General Response

The Conservation Section finds that a very thorough study of the receiving environment has been carried out. The assessment of architectural heritage, streetscape and the urban environment submitted as part of the EIAR and the proposed mitigation measures across the scheme is generally welcomed.

Appendix A16.1 Historical Background provides a detailed and well-researched discussion on the history of the development of the route. Appendix A16.2 Inventory of Architectural Heritage Sites provides a written and photographic record, importance rating and sensitivity rating for all protected structures, NIAH-recorded structures, designed landscapes, unprotected structures of built heritage significance, street furniture, paving and surface treatments. The record is comprehensive and accurately describes the quality and status of the heritage structures along the proposed route. Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric, Section 1.2.1 provides a statement on protection of architectural heritage structures and features during works. *'Some architectural heritage features will require protection during the course of works, where works are proposed in close proximity to them.'*

Where works are proposed adjacent to the historic features there is a risk of damage. The fabric will be recorded in position, protected and monitored for the duration of the works. Protection during the course of works will include cordoning off or the provision of protective wrapping or temporary hoardings or boxing off as appropriate. More specific protections are outlined in the relevant sections of this methodology'

In general, Dublin City Council's Conservation Section agrees with the above findings regarding mitigation and protection measures. Once the mitigation measures have been applied, there will be no significant adverse residual impacts on the architectural heritage resource as a result of the Construction and Operational Phase of the Proposed Scheme.

Key Impacts

Having regard to the information submitted the following are considered by the Conservation Section to be the key impacts of the Swords to City Centre route in relation to architectural heritage:

- Protected Structures and their settings
 - a) Several Protected Structures are included on the subject map sheets. These structures are located on or adjacent to the route boundary. All Protected Structures in close proximity to construction works are to be adequately protected and all proximate works are to be supervised by a conservation professional including Whitehall Garda Station (RPS 3329), 37 Drumcondra Road Upper (RPS 2370), St. Patrick's College including boundary treatments (RPS 2369), Archbishop's House on Drumcondra Road (RPS 2361), Former Holy Cross College (RPS 1901), terrace of houses at 82-94 Drumcondra Road Lower (RPS 2362-2368)
 - b) A cantilevered signal pole will have a visual impact on Binn's Bridge (RPS 908) on the Royal Canal.
 - c) There is a proposed coach stop to the immediate north of 55 Drumcondra Road Lower (RPS 2349)
 - d) The south end of the proposed route corridor is located within the Georgian Core. A large area is set aside for bus stops on the west side of Parnell Square including 31-37 Parnell Square West (RPS 6393-6399) and 31-48, 52-59 Parnell Square West (RPS 6393-6418). On the east side of Parnell Square further bus stops are proposed outside buildings included in the 1-12 Parnell Square East (RPS 1337, 6366-6377) and 1-6 Cavendish Row (RPS 1332-1336).
- NIAH Structures and their settings
 - a) All NIAH Structures in close proximity to construction works are to be adequately protected and all proximate works are to be supervised by a conservation professional including works proximal to the Church of the Holy Child (NIAH 50130240), post box Swords Road (NIAH 50131309), gate lodge of Highfield Hospital (NIAH 50130253), post box Drumcondra Road Upper (NIAH 50120002), Drumcondra Bridge (NIAH 50120266), Statue of Our Lady (NIAH 50130158), Binn's Bridge (NIAH 50060189), rail bridge (NIAH 50060296), Mater Clinic (NIAH 50010699), 15-48 and 52-59 (NIAH 50010623-50010651), 1-12 Parnell Square East (NIAH 50011010-50011020), 1-9 Cavendish Row (NIAH 50011021-50011026)
 - b) A coach stop is proposed outside 57 Drumcondra Road Lower (NIAH 50120187)
 - c) A relocated bus stop is proposed outside 22 Drumcondra Road Lower (NIAH 50120210-12)
 - d) A relocated bus stop is proposed outside 27, 29 31 Drumcondra Road Lower (NIAH 50130210)
 - e) Drumcondra Bridge/Frank Flood Bridge (NIAH 50120266/DCIHR 18_03_035) will be directly and indirectly impacted by the proposed scheme.

Works will be required to strengthen the existing masonry bridge to facilitate additional loadings and an independent structure will be constructed to its west to accommodate new pedestrian and cycle lanes.

Photomontages (see Figure 17.2.2.37-46) show the proposed design of the new structure. The new construction will have a very significant and negative visual impact on the existing masonry structure particularly from the west decreasing the legibility of the bridge arches and parapet significantly.

Where the new cycle surface abuts the historic bridge structure at the north end there is no demarcation or separation of the fabric of each element. This shall be resolved.

The wall running north of the bridge parapet will require heightening as part of the proposed construction works. The photomontages indicate that the new fabric will match the historic fabric of the bridge. Best conservation practice recommends that new fabric should be readily identifiable as such. The applicant is requested to revise this proposal for the written agreement of the Planning Authority at detailed design stage.

The feature dividing the cycle and pedestrian lanes of the new bridge has a significant visual impact on the historic fabric. The applicant is requested to revise this proposal for the written agreement of the Planning Authority at detailed design stage.

The applicant is requested to fully reconsider the design of the scheme at this location to lessen the impact on the historic masonry bridge. New work and materials should be of the highest possible architectural quality and should complement the historic features of the bridge.

A full architectural heritage impact assessment by a suitably qualified conservation professional is required for the new bridge elements, providing detailed design information and outlining the nature and likely impacts of the proposed bridge extension.

- f) The Statue of Our Lady (NIAH 50130158) which is located to the west of Frank Flood bridge will be temporarily removed during works as the site will be subject to temporary land acquisition to facilitate construction. Works should be overseen by a suitably qualified conservation professional.

- Architectural Conservation Areas

- The south end of Parnell Square East and Parnell Square West lie within O’Connell Street Architectural Conservation Area. The proposed development involves the retention of bus parking and existing car-parking along the east and west sides of the square and the realignment of historic kerbing. The installation of works will not directly impact any buildings within the ACA but there is potential for damage during construction. The proposed mitigation is the protection and monitoring of sensitive architectural heritage features within the affected areas of the ACAs prior to, and for the duration of the Construction Phase. Recording, overseeing of protective measures and monitoring is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric.

- Conservation Areas, Z2 and Z8 Zonings

- The route will cross a red hatch Conservation Area at the Tolka River at Drumcondra Bridge. Drumcondra Bridge is located within the red hatch Conservation area. The scheme maps indicate a proposed new pedestrian/cyclist bridge on the west side of the bridge and significant temporary land acquisition within the red hatch Conservation Area.
- The route will cross a red hatch Conservation at the Royal Canal at Binn’s Bridge. Binn’s Bridge is included in the RPS (ref. no. 908) and is located within the red hatch Conservation Area.
- The route will run along the western boundary of a number of areas zoned Z2 on the Upper Drumcondra Road and Lower Drumcondra Road.
- The route will run along the eastern boundary of a number of areas zoned Z2 on the Lower Drumcondra Road.
- The route will run along the western boundary of a number of areas zoned Z2 on Dorset Street Lower.
- The route will run along the western boundary of a number of areas zoned Z8 on Dorset Street Lower.

- Industrial Heritage Sites

- a) A review of the DCIHR (DCC 2003 to 2009) revealed that there are four Industrial Heritage sites identified in the study area. These include a sections of former tramway on Drumcondra Road Lower (DCIHR 18_03_039) and Dorset Street Upper (DCIHR 18_07_027). Infrastructure

associated with the tramway may survive below the road surface. The route corridor crosses the Drumcondra Bridge (DCIHR 18_03_035). The construction of a new independent structure to the west of the bridge to accommodate the new pedestrian/cyclist bridge should take into account the industrial significance of the bridge. There is a group of industrial structures where the route corridor crosses the Royal Canal and adjoining railway line in Drumcondra. This includes the rail bridge (DCIHR 18_07_010), and Binn's Bridge over the Royal Canal (18_07_022). Specific mitigation required at this location should take into account of any surviving industrial fabric.

- Potential impacts on historic paving and kerbing, historic street furniture and lamp standards and other features:

Historic Paving and Granite Kerbing:

- The cobbled surface at the base of the Parnell Monument (CBC0002BH109) and on the traffic island in front of Findlater's Church (CBC0002BTH098) may be recycled or require repositioning.
- Kerb alterations on Frederick Street North will impact on existing historic granite kerbstones on both sides of the road. The kerb stones will be recorded prior to the commencement of construction. Works should be overseen by a suitably qualified conservation professional.
- Kerb alterations will require the repositioning of the wide granite kerb stones along the west side of Parnell Square East to accommodate the new cycle track. The kerb stones will be recorded prior to the commencement of construction, removed to safe storage and will be reinstated on a new line following the completion of works. Works should be overseen by a suitably qualified conservation professional.

Lamp Posts:

- There are groups of historic lamp posts along the route at Griffith Avenue, Hollybank Road, Drumcondra Road Lower, Dorset Street Lower, Parnell Square North, Granby Road and Parnell Square west (CB0002LP001-009). The historic lamp posts on Drumcondra Road Lower (CBC0002LP003) will be moved to accommodate the proposed cycle track. There is the potential for all heritage lamp posts to be damaged during the construction phase of the scheme. Exact details of the relocation of the historic lamp posts must be provided and the works should be overseen by a suitably qualified conservation professional.
- The remaining groups will be retained in situ but there is potential for damage during construction phase.

Milestones:

- There are no milestones recorded within DCC's statutory area.

Other Street Furniture/Finishes:

- Proposed kerb realignments for the new cycleway at the junction of Botanic Road and Drumcondra Road Lower will impact stone setts lining the footpath at 45 Drumcondra Road Lower. The setts should be retained in situ and recorded prior to the construction of the new road surface. The works should be overseen by a suitably qualified conservation professional.

Proposed Tree Removal

- The Tree Removal plan which forms part of the Arboricultural Impact Assessment was reviewed for impacts on significant elements of built heritage. No trees or groups of trees

that impact on the settings of protected structures will be removed. The removal of a group of at Millmount Terrace, removal of trees at Frank Flood Bridge, at Griffith Avenue and removal of trees to central median to Drumcondra Road Lower may have an impact on the surrounding built heritage. The proposed removal of trees to the south of Holy Child Church in Whitehall will have a significant visual impact on the church.

- **Boundary Treatments**
 - The Conservation Section notes that where works may require the removal of existing roadside boundary walls, railings, entrances gates and hedgerows, together with areas of existing garden plantings garden trees, paving and garden features, new boundary walls, railings, entrances gates and hedgerows to match existing shall be reinstated at setback location, pending agreement on more detailed design with the Planning Authority's Conservation Section and having regard to the provisions of the Architectural Heritage Protection Guidelines for Planning authorities (2011) and the relevant DHLGH Advice Series publication(s).
- **Cycle Lanes**
 - The Conservation Section request that where the cycle ways are located in close proximity to Protected Structures and within Architectural Conservation Areas generally, that an alternative high quality cycle lane surface is provided in-lieu of red tarmacadam.
- **New Traffic Semaphore & Signage**
 - The proposed new bus lanes and routes may require additional traffic semaphores and signage.
Careful consideration shall be given to the siting of associated utilities and traffic management signage in relation to Protected Structures and Conservation Areas, historic paving and historic street furniture and should be kept to the necessary minimum. Consideration should be given to the rationalisation of all traffic infrastructure such as signage, traffic poles, utility boxes etc. across the route to reduce visual clutter, in particular in the vicinity of Protected Structures, within Architectural Conservation Areas, red-hatched conservation areas and in residential conservation areas.
Consideration should be given to the omission of gantry traffic signage in the vicinity of Protected Structures, within Architectural Conservation Areas, red hatched conservation areas and residential conservation areas and alternative traffic signage solutions should be sought.
- **Proposed Bus Stops**
 - The location, form and materials of the proposed bus stops / shelters / information posts has the potential to impact upon the character and setting of Protected Structures and Conservation Areas.
 - Mitigation will be required to mitigate the visual impact of bus stops / shelters / information posts sited near or fronting Protected Structures and Architectural Conservation Areas.
Consideration should be given to the rationalisation of bus stops to the east and west sides of Parnell Square.
 - The treatment of new kerbing and paving associated with the provision of bus stops / shelters / information boards should be appropriate in material and colour to the location, particularly where adjacent sections of historic stone paving and kerbing exist in situ.
 - The alignment of footpaths should respect the setting of Protected Structures and buildings on the NIAH.

Recommended Conditions

These are set out in the Appendix below.

2.4.10 City Architects Division Comments

The City Architects Division welcomes in principle the objectives of the proposed scheme to support integrated sustainable transport use through infrastructure improvements for active travel (both walking and cycling), and the provision of enhanced bus priority measures. The proposed scheme will facilitate the modal shift from car dependency through the provision of walking, cycle, and bus infrastructure enhancements thereby contributing to an efficient, integrated transport system and facilitating a shift to a low carbon and climate resilient city.

It is noted that the proposals for public realm upgrades include widened footpaths and high quality hard and soft landscaping to contribute towards a safer, more attractive environment for pedestrians, and that the scheme has been developed having regard to relevant accessibility guidance and universal design principles so as to provide access for all users.

The City Architects Division wishes to comment on the proposals, noting the following:

Local Public Realm Improvement Schemes:

The proposed scheme includes images of proposed public realm improvements at the following locations

1. The shopping Parade near Iveragh Rd (Sheet 25).
2. The DCU Area (Griffith Ave to Botanic Rd) (Sheet 30).
3. The footpaths in the vicinity of the Cat & Cage pub (Drumcondra Rd Upper) (Sheet 30).
4. Drumcondra Bridge (Sheet 31).

However limited information is provided to facilitate proper assessment of the proposals.

Bus Shelter Design:

Bus shelter locations are indicated on the drawings but limited information provided on their design and whether there is sufficient capacity on the footpaths to accommodate them, and passengers congregating in their vicinity. Locations of bus shelters should have regard to existing building entrances, and visual impacts on Architectural Conservation Areas and Protected Structures.

In the interest of visual amenity and having regard to protected structures and their settings, advertisements should not generally be permitted on bus shelters in Architectural Conservation Areas, or Special Planning Control Schemes (SPCS) designated in the City Development Plan, or where they impact unduly on the vistas and settings of Protected Structures.

Siting of utility cabinets and above-ground utility infrastructure:

The 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.

Palette of Materials

It is noted that the 'Typical Material Typologies' in Section 4.6.11.2.1, of Volume 2, Chapter 4 Proposed Scheme Description, and Volume 3, Figures, Chapter 4.5 Landscaping General Arrangement drawings, do not appear to include or refer to existing historic fabric such as historic granite paving and historic granite kerbs within the Proposed Scheme, eg Parnell Square West.

New Pedestrian and Cycle Bridge at Drumcondra Bridge/Frank Flood Bridge

The proposed materials which replicate the historic stonework of the 200 year old bridge are unsatisfactory, creating a lack of definition between the historic structure and the new, and this does not follow acceptable conservation practice

Palette of street furniture:

A full palette of street furniture to include street lighting, bins, benches, bollards, cycle stands, wayfinding poles, digi-panels etc. and confirmation on their proposed locations is required.

Confirmation is sought as to whether an identical palette is to be used for the proposed scheme across all the local authority administrative areas or whether each local authority (and perhaps specific urban villages) will have their own palette.

Confirmation is sought as to whether there will be uniformity in the palette of street furniture across all the BusConnects Core Bus Corridor Schemes.

Boundary treatments:

Where property boundaries along the route are to be relocated to facilitate land acquisition, the fabric in the existing boundaries should be assessed for their architectural conservation value and cultural value. The assessment should confirm whether the fabric, which may include railings, walls etc. is suitable for repair and re-use for sustainability reasons in the new boundaries rather than replaced with new.

Signage

The number of poles installed to support signage and traffic signals should be rationalised and reduced to a minimum. Section 4.6.9.1.2 Gantry Signage of Chapter 4 (proposed Scheme Description) states that no new gantry signage is included in the proposed scheme, although it is indicated at a number of locations, including in low speed residential areas, and conservation areas, where it has undue visual impacts.

Village Signage:

Existing 'Welcome to Village xxx' signage provide local wayfinding landmarks and should be retained as part of the proposed scheme, in agreement with the local authority and community.

City Parade Route

Part of the route corresponds with the City Parade Route, (Frederick Street North, Parnell Square East) which requires a 7 metre minimum width.

See appendix for more detailed recommendations/conditions.

Comments on the Per Cent for Arts Scheme

The NTA should apply the Per Cent for Art Scheme as part of the development of each of the Bus Connects Core Bus Corridors. The Per Cent for Art scheme is a government initiative, first introduced in 1978, whereby 1% of the cost of any publicly funded capital, infrastructural and building development can be allocated to the commissioning of a work of art. Since 1997 this scheme has been made available to all capital projects across all government departments. This includes application relating to Transport and Roads. In July 2019, the Minister for Culture, Heritage and the Gaeltacht announced new bands and maximum limits for Per Cent for Art Scheme. Effective from 1 January 2020, the new investment bands and limits are:

- projects below €5,000,000: 1% of the cost of the project to a maximum of €50,000 (1% of upper limit)
- projects between €5,000,000 and €20,000,000: 1% of the cost of the project to a maximum of €125,000 (1% at median)
- projects between €20,000,000 and €50,000,000: 1% of the cost of the project to a maximum of €350,000 (1% at median)
- projects in excess of €50,000,000: Up to €500,000 being 1% of the lower level scale and declining as projects increase in scale

Each of the Bus Connects Core Bus Corridors is treated as a separate capital project and therefore the Per Cent for Art Scheme should be individually applied.

For further information:

<https://www.gov.ie/en/publication/38b6d-per-cent-for-art/#:~:text=The%20Per%20Cent%20for%20Art,of%20a%20work%20of%20art.>

Implementation of the Per Cent for Art Scheme: Bus Connects Core Bus Corridor Routes

The City Arts Office which has specialist public art expertise will manage the commissioning process working closely with colleagues in Dublin City Council involved in the development of the Bus Connects Core Bus Corridor Routes and with the National Transport Authority. The commissioning process will follow the National Guidelines for the Per Cent for Art Scheme as published by the Irish Government (2004). The initial stage of the process will include devising an approach to the commissioning programme which is appropriate for the commissioning context and the capital project. This service will also include drafting the brief, organising the competition, selection of the artists, drafting contracts, managing the finance and liaising with the commissioners and appointed artists throughout the commissioning process. In addition, each commission will be comprehensively documented.

2.4.11 City Parks, Biodiversity and Landscape Division Comments

1. Agreement on taking in charge of landscape components of the proposals by DCC Park Services will require liaison and agreement on layout and planting details prior to implementation. Amendments to planting proposals may be required to comply with Park Services contract maintenance requirements.
2. All landscape components of the proposals will require contract maintenance for a minimum of 3 years following completion of the works or any work phases. Landscape areas agreed to be taken in charge will require full completion of the 3 year maintenance period and rectification of any defects or loss of planting.
3. Tree risk assessment is to be carried out at end of year 1 and year 3 following completion of the works to identify any potential risks arising to the public or property, on retained trees

within the project areas. Remedial works to trees shall be completed prior to taking in charge.

4. Tree planting proposals are welcome within the proposals however the constraints of overhead and underground services on this planting and other constraints, such as planting close to existing boundaries should be realistically assessed at detail design stage.
5. Clarity is required on the proposed quantity of compensatory public street tree planting along the route in comparison to the proposed removal of existing street trees. If appropriate compensatory planting falls below the loss of existing street trees then other forms of compensation shall be agreed with DCC Park Services.
6. The implementation of the arboricultural and landscape proposals will require the professional input of Arboriculturists and Landscape Architects appointed by the project proponent for the full duration of project work contracts. Construction details for components of the project that will be taken in charge shall be agreed at design stage with Park Services.
7. Tree protection measures for all existing trees shall be put in place prior to the commencement of development or phases of development. Where existing trees require remedial measures to alleviate risk to the users of the completed development, then these shall be completed by the project proponent. The project proponent shall be required to fund tree remedial works or tree replacement works where existing trees retained decline or fail within 5 years of the completion of the project or project phases.
8. Please indicate local authority administration boundaries on all further submitted plans.

Specific comments

1 EIAR Chapter 17 (17.4 Potential Impacts)

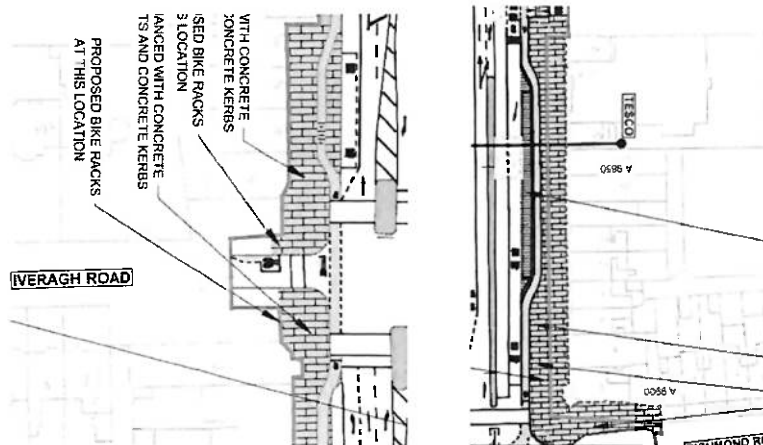
1.1 Sheet 22 Shanrath Rd. The proposals to locate a section of cycle path through the existing tree group at this location (see image below) shall be reviewed in view of potential impact to tree root zone. An alternative alignment adjacent/combined with the road's footpath shall be assessed or omission of these works may be considered in view of the short distance involved.



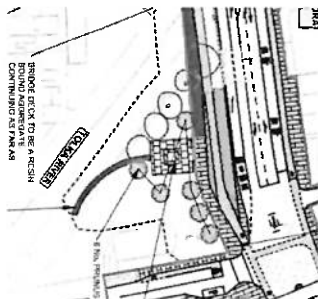
1.2 Sheet 25 Whitehall. The proposals including bus lane and cycle path impact a row of existing trees (image below). Some tree locations may have the potential to be retained, please review.



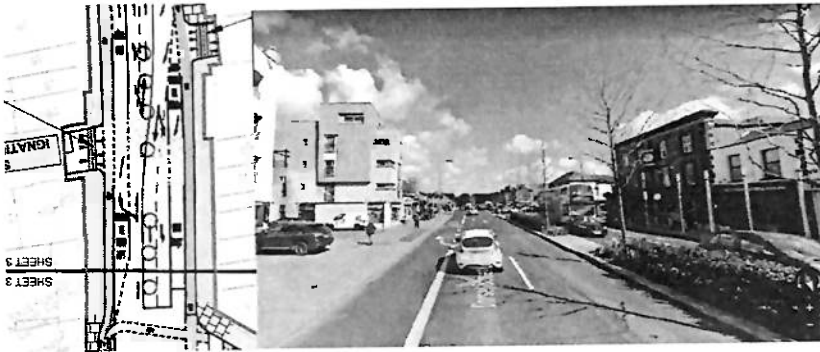
1.3 Sheet 25 Iveragh Road & Sheets 30-31 Upper Drumcondra Road. Wide pavement areas (images below). Visual mitigation by greening shall be included for all wide pavement areas to be resurfaced under the scheme. Such areas shall also be used where practicable for compensatory tree planting to mitigate tree removals along the scheme's route.



1.4 Sheet 31 Our Lady's Park. There is excessive land take and tree removal in this small community grade park. The proposals require review to align the proposed path & cycle-path back with the road south of the proposed new bridge and retain the park's stone boundary wall. A more detailed landscape plan is required to resolve this issue with DCC Park Services.



1.5 Sheets 33-34 Dorset St Lower. The proposals include removal of recent central median planting. To mitigate this impact compensatory tree planting shall be assessed for the immediate adjacent pavement areas and implemented where feasible.



2. Appropriate Assessment Screening and Natura Impact Assessment

2.1 The AA screening report and conclusions, i.e. the possibility of significant effects on European Sites from the scheme are noted.

2.2 The NIS concludes that with mitigation the Proposed Scheme will not adversely affect (either directly or indirectly) the integrity of any European site and this is noted.

All mitigation measures included in the NIS shall therefore be a requirement for the approval of this scheme.

2.5 Conclusion

The proposed Swords to City Centre Core Bus Corridor Scheme is supported and welcomed by Dublin City Council as it will ensure the delivery of a number of key policies and objectives of the Dublin City Development Plan 2022-2028. The development of the Core Bus Corridor Scheme will provide an upgraded and expanded bus network and quality of service together with better quality cycling and pedestrian facilities. These improvements will make it easier for people to access and use public transport. In turn, this will promote modal shift from the private car to more sustainable forms of transport including walking, cycling and public transport, ultimately contributing to the creation of a greener and more sustainable city.

With regard to compliance with European, national and local policies and requirements, it is considered that An Bord Pleanála is the competent planning authority, however, Dublin City Council is satisfied that the application generally accords with all such requirements in addition to being consistent with, and supported by, the statutory Dublin City Development 2022-2028. In the event that An Bord Pleanála is satisfied that the proposed development should be approved, the Planning Authority requests that the scheme be approved subject to conditions to ensure that the development is carried out in accordance with the proper planning and sustainable development of the area and suggested conditions are included in Appendix 1 attached to this report.

APPENDIX 1

Recommendations/Conditions

Agreed conditions - Between Dublin City Council (DCC) and the National Transport Authority (NTA)

1. That a comprehensive agreement is put in place between DCC and the NTA regarding how the corridor is to be handed over to the NTA and its contractors, what pre-inspection and recording of the corridor is necessary and how the corridor is to be maintained during construction activities and by whom. The agreement shall also address the handback process, the treatment of all relevant records treated and how the corridor is to be accepted back by DCC following construction.
2. Following handback, a separate agreement shall be put in place between DCC and the NTA regarding the costs of maintenance of the corridor as a high quality public transport corridor with agreed levels of performance and how the performance of the public transport corridor is not eroded in the future.
3. All relevant DCC departments involved with the development of the Scheme shall be consulted during the detailed design development process for the Scheme and the NTA shall incorporate the requirements of the DCC departments into the final detailed design of the Scheme.

Department Recommendations/ Conditions

Recommendations/Conditions – Traffic Division

1. All the traffic management equipment that is necessary for the safe and efficient operation of this Public Transport corridor, including all traffic signal equipment, shall be to the relevant DCC specification and only the relevant DCC maintenance contractor shall be permitted to undertake electrical or system control work on either the existing or new traffic signals.

Roads Division Standard Conditions

Handover:

1. Prior to commencement of any works, a formal Handover Procedure Agreement shall be agreed with Dublin City Council and put in place. This procedure shall be carried out on any section of work as soon as it is completed. A global handover of all works at the end of the construction period shall not be permitted. As built drawings of each section of the finished works shall be provided in A1 sized hard copy to an appropriate scale and also in electronic format compatible with DCC's current version of Microstation. These as built drawings shall include details of new services and alterations to existing services. Drawings shall also be provided showing exactly what areas are to be in DCC's charge

Existing Condition Record:

2. A photographic record of all areas in Dublin City Council's control to be affected by the Bus connects scheme works shall be provided to Dublin City Council (DCC) prior to the commencement of any work.
3. Drawings distinguishing between antique granite footways and kerbs and new granite footways and kerbs shall be submitted as part of detailed design development of approved scheme.
4. Drawings clearly demarcating private landings shall submitted as part of detailed design development of approved scheme.

Design:

1. Final details (including materials, finishes, sizes, gradients, levels and drainage) of all junctions, carriageways, islands, buildouts and footways as well as all signal/traffic light infrastructure shall be agreed with DCC prior to construction.
2. All Construction works shall comply with the "Construction Standards for Roads and Street Works in Dublin City Council".
3. Road Safety Audits shall be carried out for each public road that is to be modified as part of the Bus Connects scheme works at appropriate stages throughout the design of each individual scheme.
4. The alignment of the Bus Connects scheme shall be designed so as ensure that all longitudinal gradients and crossfalls on carriageways, islands, buildouts and footways are in accordance with those specified in "Construction Standards for Road and Street Works in Dublin City Council" unless otherwise agreed with DCC.
5. Pedestrian priority shall be ensured throughout the Scheme design through signage and physical design measures where appropriate.
6. Buffer strips shall be provided at all locations where cycle lanes run between parking and loading areas and the kerb/footpath to ensure pedestrians including those with disabilities can safely alight from vehicles.
7. The Scheme shall ensure that principles of universal design are adhered to and accessibility requirements are met throughout the Scheme.
8. Modifications to existing in-curtilage car parking of properties impacted by the works shall ensure a footprint of 5 metres by 3 metres for car parking is retained in order to avoid parked cars overhanging the public footpath. Driveway entrances should be maximum 3m width in accordance with the standards set out in Dublin City Development Plan 2022-2028.
9. Alterations to kerbside spaces such as pay and display scheme/loading/line markings/signage pole shall be agreed with the Planning Authority to ensure adequate loading and set down is provided.
10. All signage and road markings to comply with the *Traffic Signs Manual*.

Reinstatement:

11. All reinstatement work and areas to be taken in charge shall be carried out in accordance with "Construction Standards for Road and Street Works in Dublin City Council" unless otherwise agreed with DCC.

12. The extent and type of the reinstatement required shall be agreed with DCC prior to commencement of any work on site. This shall be shown on drawings and signed off on by both parties.
13. All works to public roads in DCC's Functional Area shall comply with the Council's *Construction Standards for Road and Street Works in Dublin City*.
14. Samples of all new natural stone kerbs, flags and setts to be used in reinstatement works shall be supplied to DCC for agreement prior to use.

Construction Period:

15. All roadworks shall be carried out in accordance with the current edition of Dublin City Council's *Directive for the Control and Management of Roadworks in Dublin City* unless otherwise agreed with DCC.
16. In cases of reinstatement of areas where the roadway or footway is not being reconstructed in full (e.g. trench for utility along side street) the NTA or their Contractor shall pay DCC long term damages charges as set out in the current edition of Dublin City Council's *Directive for the Control and Management of Roadworks in Dublin City*.
17. All antique setts if removed as part of the works shall be cleaned, stored on pallets by the contractor and reinstated in the carriageway to DCC's specification if required by DCC unless otherwise agreed with Dublin City Council.
18. All existing and antique natural stone kerbs and flags, if removed without damage as part of the works, shall be cleaned, stored on pallets by the contractor and reinstated in the footway to DCC's specification.
19. During construction and prior to opening of the Scheme, the National Transport Authority shall undertake an awareness, education and behavioural change programme to educate road users as how to use the Scheme with particular regard to interaction between pedestrians and cyclists.

Miscellaneous

20. Where cellars exist and are effected by the scheme, these shall be acquired in whole or in part only where necessary for implementation of the proposed scheme.

Recommendations/Conditions - Public Lighting

In terms of delivering the Public Lighting elements of this project, it is recommended that careful consideration be given during the detailed design process to all the various different elements including the required light level design and the relevant EN certification as well as existing heritage and high value lighting Columns.

In addition there is the agreed condition for the survey and handover of all items along the corridor and these would include the Public lighting infrastructure and all associated items, careful consideration of existing and proposed trees within the corridor is also required as to their impact on lighting levels.

1. It must be noted that special consideration must be given to any scheme where the Public Lighting is mounted on ESB Networks Infrastructure.
2. Public Lighting works may only be carried out on street lights mounted on ESB Networks in accordance with 'ESB Requirements for Work on Public Lighting on ESB's Networks' and by Public Lighting Contractors who have the required training and approvals for such work. These requirements impose stringent requirements on Local Authorities and Contractors.
3. All heritage public lighting must be safeguarded and protected and any requirements to move heritage columns must be agreed with the Public Lighting department.

Temporary Lighting

If the route where works are being carried out remains open for public use, e.g. to facilitate the continued movement of vehicles and pedestrians, then the route must be lighted at all times during night time hours.

Recommendations/Conditions – Environmental Protection Division

The key requirements for this development from a surface water/drainage/flood management perspective are outlined as follows:

1. This development must comply with the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0 (available from www.dublincity.ie Forms and Downloads). In particular:
 - Continuous Kerbs incorporating drainage, as outlined in Figure 2, Page 3 in Appendix K Drainage Design Basis Document, are not accepted by DCC Drainage Planning, Policy and Development Control.
 - Enclosed drainage channels such as slot drains or “ACO” drains are not accepted by Drainage Planning, Policy and Development Control.
 - The hybrid gully outlined in Section 1.1.3, Page 4 in the BusConnects - Road run-off collection gullies Technical Paper is not accepted by DCC Drainage Planning, Policy and Development Control. The use of narrow profile gullies as previously agreed is welcome.
2. The development shall incorporate Sustainable Drainage Systems in the management of surface water, providing an integrated approach with the landscaping proposals. Full details of these shall be agreed in writing with DCC Drainage Planning, Policy and Development Control prior to commencement of construction. Soft landscaping should be considered before hard landscaping. The SuDS design should refer to the new Dublin City Council Sustainable Drainage Design and Evaluation Guide published in 2021.
3. There are numerous opportunities to include Nature Based Solutions that have not been realised in the outline design. These shall be addressed at detailed design stage with areas discharging to the River Tolka River being particularly important. Attenuation design to be revisited, current design is not clear.
4. The detailed drainage design shall be agreed in writing with DCC Drainage Planning, Policy and Development Control prior to commencement of construction. Surveys on the location and condition of surface water infrastructure sewers, both pre and post development, shall be carried out by the developer and any damage rectified. Any diversions shall be agreed in writing, prior to commencement, with Drainage Planning, Policy and Development Control. To avoid multiple connections to combined sewers a separate surface water network would be preferable in instances where this could be achieved. The developer shall explore all opportunities to segregate the surface

water from the combined drainage system. Details on proposed connection locations to the surface water network and flow discharges shall also be agreed.

5. To support our achievement of our legislative obligations the Swords to City Centre Core Bus Corridor Scheme proposal should not cause a deterioration of the status of any waterbody to which it is contiguous with downstream and furthermore should not jeopardise the attainment of good ecological and 'good' water chemical status for the River Tolka in accordance with DCC and national obligations. NTA shall provide an evidence-based assessment of the impact, if any, of the proposed scheme on the water quality status of rivers within the curtilage of the proposed project, including both ecological and chemical status.

6. The NTA shall confirm in writing to Drainage Planning, Policy and Development Control that the development has been designed such that the risk of flooding to the development has been reduced as far as is reasonably practicable, and that the proposals do not increase the risk of flooding to any adjacent or nearby area. This includes assessment of pluvial flood risk at all locations along the route (not just where sections are 150m long). The effect of climate change on flooding, +20% rainfall and 0.5m sea level rise should be allowed for in calculations. Any changes in ground profile shall be modelled to demonstrate no increase in flood risk and to reduce it where reasonably possible.

7. The developer must demonstrate that this development passes the three stages of the SFRA Justification Test, particularly for fluvial flooding.

8. New compensatory SuDS measures should be provided close to any green areas lost.

9. As-built drawings of all drainage networks and SuDS measures shall be provided by the NTA on completion of the works.

Recommendations/Conditions – Air and Noise Pollution Control Unit

1. Noise Control and Air Quality Control - Demolition and Construction Phase It is recommended that the works must be carried out having regard to a Construction Management Plan submitted with the application. The plan must be written having regard to this Unit's Good Practice Guide for Construction and Demolition (below link). The plan must be approved by the Planning Department before work commences.
<https://www.dublincity.ie/residential/environment/air-quality-monitoring-and-noisecontrol-unit/good-practice-guide-construction-and-demolition>

Archaeology

1. NTA appoint a Project Archaeologist as a member of the NTA project team to oversee all archaeological aspects of the project from inception to completion. The Project Archaeologist will manage archaeological aspects of the project and input on, inter alia:
 - project planning and design,
 - scheduling of archaeological mitigation,
 - the development of programmes,
 - the development of construction and procurement strategies,
 - the preparation of contract documentation,
 - the appointment of competent consultant archaeologists,
 - advance works, construction and potential operational issues.
2. The Project Archaeologist shall ensure that the process of identifying the potential impact the project on archaeology is dealt with by a competent archaeologist.

3. The Project Archaeologist shall oversee the archaeological operations carried out by the contractor's archaeological consultant.
4. The Project Archaeologist shall ensure that appropriate investigation is carried out, where reasonably practicable, prior to the commencement of construction to identify both the known and unknown archaeology that may be impacted by the project. Where this is not reasonably practicable, an appropriate archaeological strategy to mitigate the known or potential archaeological impacts to be developed in consultation with the Minister.
5. The Project Archaeologist shall consider whether the archaeology can be preserved in situ within the confines of the project. Where preservation in situ cannot reasonably be achieved, allow sufficient time to preserve by record all archaeological remains that are impacted by the project to a level that is acceptable to the Minister.
6. The NTA shall 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.
7. The Project Archaeologist shall ensure the publication and/or dissemination, as appropriate, the archaeological results of the project.
8. The Project Archaeologist shall copy Dublin City Council Archaeology Section with all Section 26 method statements and any reports arising and provide regular updates on finds and mitigation throughout the delivery of the scheme through to completion.
9. The primary archaeological paper archive for all archaeological site investigations to be prepared and deposited with the Dublin City Archaeological Archives within a timeframe to be agreed with the planning authority unless otherwise agreed with the Minister.

Conservation

Recommendations/Conditions

1. To safeguard the special architectural interest of affected Architectural Heritage across the Bus Connects routes - including Protected Structures and Conservation Areas, landscaping, historic paving, setts, kerbing and associated features, boundary treatments, historic street furniture, gardens and trees and historic public realm etc. - and to ensure that the proposed works will be carried out in accordance with best conservation practice with no unauthorised or unnecessary damage or loss of historic fabric, the Conservation Section recommend that all works shall be designed and supervised by an expert in architectural conservation in accordance with the provisions (outlined above) of the Dublin City Development Plan 2022-2028, the *Architectural Heritage Protection Guidelines for Planning Authorities (2011)* and relevant documents of the DHLGH Advice Series.
2. The conservation professional shall ensure adequate protection of the retained and historic fabric during the proposed works and across all preparatory and construction phases. In this regard, all works shall be designed to cause minimum interference to historic fabric.
3. In accordance with best conservation practice, specifications and method statements for the careful and sensitive relocation and reinstatement of historic fabric identified in the report above, and in particular to Protected Structures, sites/structures on the NIAH and DCIHR, and structures and features in Architectural Conservation Areas (ACAs) across the Bus Connects route shall be submitted by the conservation professional for the written approval of the Planning Authority in advance of works commencing.
4. The conservation professional shall advise the Conservation Section on architectural heritage and conservation matters that may have further impacts on the project throughout the construction phases.

5. If, through the course of construction work across the Bus Connects routes, hitherto unknown and concealed architectural heritage fabric is found, the conservation professional shall contact the Conservation Section to advise them of the discovery as the presence of historic fabric may inform an alternative strategy for a design proposal that would enhance the setting of a Protected Structure, other historic buildings and features, an Architectural Conservation Area or Conservation Area.
6. All works shall be carried out in accordance with best conservation practice, the Architectural Heritage Protection Guidelines for Planning Authorities (2011) and the Advice Series issued by the Department of the Housing, Local Government and Heritage. All repair works shall retain the maximum amount of surviving historic fabric in situ. Items to be removed for repair off-site shall be recorded prior to removal, catalogued and numbered to allow for authentic re-instatement.
7. All existing original architectural heritage features, in the vicinity of the works shall be protected during the course of all phases of construction works.
8. All repair of historic fabric shall be scheduled and carried out by appropriately experienced conservators of historic fabric.
9. The Conservation Section recommends the following specific measures:
 - a) A full architectural heritage impact assessment by a suitably qualified conservation professional of the proposed bridge extension works at Drumcondra / Frank Flood Bridge providing detailed design information and outlining the nature and likely impacts of the proposed bridge extension shall be submitted for the written approval of the Planning Authority in advance of works commencing.
 - b) A full architectural heritage impact assessment for the new bridge elements shall be submitted for the written approval of the Planning Authority in advance of works commencing.
 - c) Redesign of the scheme at the Frank Flood Bridge to lessen the physical and visual impact on the historic masonry bridge shall be submitted for the written approval of the Planning Authority in advance of works commencing. New work and materials should be of the highest possible architectural quality and should complement the historic features of the bridge.
 - d) Full details of the design and type and location of each bus shelter / stop along the proposed route in front of Protected Structures and structures on the NIAH shall be submitted to and agreed in writing with the Planning Authority in advance of works commencing.
 - e) Consideration should be given for the omission of bus shelters in front of and in the immediate vicinity of Protected Structures across the route and for bus stops only to be considered at these locations, in order to minimise visual clutter and protect the special architectural character of Protected Structures. This shall be confirmed in writing to the Planning Authority in advance of works commencing.
 - f) Consideration should be given to the rationalisation of bus stops to the east and west sides of Parnell Square. This shall be confirmed in writing to the Planning Authority in advance of works commencing.
 - g) Consideration should be given to the rationalisation of all traffic infrastructure such as signage, traffic poles, utility boxes etc. across the route to reduce visual clutter, in particular in the vicinity of Protected Structures, within Architectural Conservation Areas, red-hatched conservation areas and in residential conservation areas.
 - h) Consideration should be given to the omission of gantry traffic signage in the vicinity of Protected Structures, within Architectural Conservation Areas, red hatched conservation

areas and residential conservation areas and alternative traffic signage solutions should be sought.

- i) Where cycle ways are located in close proximity to Protected Structures and within Architectural Conservation Areas generally, consideration shall be given to an alternative high quality cycle lane surface in-lieu of red tarmacadam.
- j) The alignment of footpaths should respect the setting of Protected Structures and buildings of National importance.

City Architects Recommended Conditions

Local Public Realm Improvement Schemes

Detailed drawings and specifications of the proposed urban realm improvement schemes identified at

1. The shopping Parade near Iveragh Rd (Sheet 25).
2. The DCU Area (Griffith Ave to Botanic Rd) (Sheet 30).
3. The footpaths in the vicinity of the Cat & Cage pub (Drumcondra Rd Upper) (Sheet 30).
4. Drumcondra Bridge (Sheet 31).

shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Bus Shelter Design

Full details of the design and type of bus shelters for each location shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Siting of utility cabinets and above-ground utility infrastructure:

The siting of all utility cabinets and other above-ground utility infrastructure shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Palette of Materials

The extent of existing hard landscape to be retained within the Proposed Scheme shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

All historic fabric shall be recorded and retained within the proposed scheme in accordance with best conservation practice and shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Palette of street furniture:

A full palette of street furniture and their proposed locations across all the proposed BusConnects Core Bus Corridor Schemes, shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development

Boundary Treatments

The fabric in all property boundaries which are to be relocated to facilitate land acquisition along the Proposed Scheme should be assessed for their architectural conservation value and cultural value. This assessment should be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

The fabric in all property boundaries which are to be relocated to facilitate land acquisition along the proposed scheme should be assessed to see whether it may be suitable for repair and re-use for sustainability reasons in the new boundaries rather than replaced with new. This assessment should be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Detailed drawings and specifications of the proposed materials proposed for the pedestrian and cycle bridge at Drumcondra Bridge (Frank Flood Bridge), and their interface with the historic bridge, shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development

Village Signage:

Village signage should be incorporated into the proposed scheme, and a scheme of city wide co-ordinated village signage should be undertaken and shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Per Cent for Art Scheme

The Proposed Scheme shall incorporate public art in accordance with the provisions of the Per Cent for Art Scheme. The process of commissioning public art within Dublin City Council's administrative area shall be managed by Dublin City Council's Arts Office in accordance with national guidelines, 'Public Art: Per Cent for Art Scheme' (2004) and in consultation with the National Transport Authority.

Reason: To animate the public domain and promote the arts and culture in the city.

Parks Division Recommended Conditions

1. Agreement on taking in charge of landscape components of the proposals by DCC Park Services will require liaison and agreement on planting details prior to implementation. Amendments to planting proposals may be required to comply with Park Services contract maintenance requirements.
2. All landscape components of the proposals will require contract maintenance for a minimum of 3 years following completion of the works or any phases. Landscape areas agreed to be taken in charge will require full completion of the 3 year maintenance period and rectification of any defects or loss of planting.

3. Tree planting proposals are welcome within the proposals however the constraints of overhead and underground services on this planting and other constraints, such as planting close to existing boundaries should be realistically assessed.
4. Clarity is required on the proposed quantity of compensatory street tree planting along the route in comparison to the proposed removal of existing street trees. If appropriate compensatory planting falls below the loss of existing street trees then other forms of compensation shall be agreed with Park Services.
5. The implementation of the arboricultural and landscape proposals will require the professional input of Arboriculturists and Landscape Architects for the full duration of project work contracts. Construction details for components of the project that will be taken in charge shall be agreed at design stage with Park Services.
6. Tree protection measures for all existing trees shall be put in place prior to the commencement of development or phases of development. Where existing trees require remedial measures to alleviate risk to the users of the completed development, then these shall be completed by the project proponent. The project proponent shall be required to fund tree remedial works or tree replacement works where existing trees retained decline or fail within 5 years of the completion of the project or project phases.
7. The National Parks and Wildlife Service (NPWS) have notified the Biodiversity Services of Dublin City Council that otter are potentially crossing the roadways at Binn's Bridge on the Lower Drumcondra Road. Therefore, the applicant should consult with the NPWS/Dublin City Council Biodiversity Officer and make provision to install an otter pass/wildlife corridor at this location if required.
8. Mitigation measure BD9 states that "There will be no additional lighting within 5m of the PRF during the Construction Phase of the Proposed Scheme to avoid potential disturbance to roosting bats." The five metre buffer zone proposed seems low and should be increased if necessary to ensure that no bats are entombed by bright lighting during construction.
9. Biodiversity mitigation and monitoring shall be carried out in accordance with the submitted Natura Impact Statement and Environmental Impact Assessment Report. The proposed mitigation measures and other ecological measures should be overseen by a suitably experienced and qualified ecologist, to ensure compliance with the Wildlife Acts 1976-2021 and European Communities (Birds and Natural Habitats) Regulations 2011-2021. Written notification of their commencement to be submitted to the Planning Authority.

Richard Shakespeare
Assistant Chief Executive
Dublin City Council