



An
Bord
Pleanála

Memorandum ABP-317121-23

To: Board
From: Liam Bowe, Senior Planning Inspector
Re: Oral Hearing Recommendation for application under Section 51(2) of the Roads Act 1993 Application no. ABP-317121-23
Date: 5th December 2023

Introduction

National Transport Authority have made an application under Section 51 (2) of the Roads Act 1993 as amended, for approval in relation to a proposed road development scheme. The proposed scheme is 1 of 12 no. bus corridor schemes under the Bus Connects programme and is accompanied by a Compulsory Purchase Order reference ABP 317164-23 for which there is a separate Oral Hearing recommendation.

Description of Development

The proposed scheme submitted under this application will comprise the construction of the Swords to City Centre Bus Corridor which has an overall length of approximately 12km and is routed along the R132 Swords Road. The Proposed Scheme 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 DCU 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.

Key improvements include:

- The number of pedestrian signal crossings will increase by 47% from 86 to 125 as a result of the Proposed Scheme;
- The total segregated cyclist facilities (both directions) will increase from 6.8km to 18.8km and the proportion of segregated cycle facilities will increase from 48% on the existing corridor to 100% on the Proposed Scheme;
- The proportion of the route having bus priority measures will increase from 72% on the existing corridor to 100% on the Proposed Scheme.

Specific works proposed within the development include the following:

- 100% of route with bus priority measures and traffic management.
- 21.6km (total both directions) of cycling infrastructure and facilities.
- Provision of new / refurbished pedestrian facilities, and footpaths along the scheme and associated ancillary works.
- Provision of a pedestrian and cycle bridge consisting of a 50 metre 2-span steel structure to the western side of Frank Flood Bridge.
- Provision of 34 junction upgrades including conversion of two existing roundabouts to signalised junctions and associated ancillary works.
- Reconfiguration of existing bus stops resulting in 24 number new bus stop facilities.
- Public Realm works including landscaping, planting, street furniture, street lighting, retaining walls, boundary walls, and sustainable urban drainage measures,
- Roads associated earthworks including excavation of unacceptable material, importation of material, temporary storage of materials.
- Provision of road pavement, signing, lining and ancillary works.
- Provision of gates, fencing and boundary treatment works.
- Construction of accommodation works including boundary treatment and ancillary grading and landscaping works together with all ancillary and consequential works associated there with.

The Construction Phase for the Proposed Scheme is anticipated to take approximately 36 months to complete. It will be constructed based on individual sectional completions that will individually have shorter durations typically ranging between 3 to 18 months. Various amounts of third-party lands will be required to be compulsorily acquired along the entirety of the route to facilitate the proposed development.

Environmental Impact Assessment

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

Appropriate Assessment

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

Third Party Observations

47 no. third party submissions have been received and are summarised within Appendix 1 of this memo, 3 of which have requested an Oral Hearing. In relation to the content of the submissions it is of note that many issues raised are common to all of the submissions. For example, 14 no. are concerned with traffic management during the construction phase, 10 no. submissions raise concerns in relation to the loss of trees / green space at locations along the route, 9 no. are concerned about aspects of pedestrian / cyclist safety, and others relate to individual properties or other elements of the scheme.

Prescribed Bodies

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

comments are made in relation to works relating to the removal of vegetation, protection of Recorded Structures and Monuments and watercourses during construction works:

1. Transport Infrastructure Ireland (TII)

- TII's submission seeks to address the safety, capacity and strategic function of the national road network and existing Luas.

Summary of potential interaction with the Proposed Scheme

- TII observes that the Proposed Scheme will interact with the national road network carriageways and the light rail network at five general locations:
 - (i) R132 Airport Roundabout,
 - (ii) Crossing under the M50 between Junctions 3 and 4,
 - (iii) Coolock Lane adjacent to Junction 2 of the M50,
 - (iv) Part travelling over the Dublin Tunnel, and
 - (v) Parnell Square East and West where the Luas runs.
- TII highlight that neither the existing national road nor light rail networks appear to be separately considered as discreet chapters or subsections of the submitted EIAR.
- TII request that a commitment is made to include a detailed Construction Traffic Management Plan in the CEMP.
- TII consider that it would have been appropriate to include and record mitigation of potential impacts for the protection of national roads and light rail networks as part of Chapter 22 of the EIAR and the CEMP.

National Roads Interaction and Mitigation

- TII advises that any crossing of the national road network, including by under (M50) or overpass (Dublin Tunnel) will require prior consultation with TII and compliance with TII standards.
- TII advises that consultation and appropriate protocol agreement with the Motorway Maintenance and Renewals Network A Contractor (MMaRC) is required in relation to works at the R132 Airport Roundabout.
- TII notes that minor modification to the verge beneath Turnapin Bridge (underbridge carrying the M50) has been agreed with the NTA but advise

that all detailed design and execution be in accordance with TII Publications standards and access protocol be followed.

- Prior consultation will be required for any works at Coolock Lane that may impact the national road network including pavement, structures and drainage adjacent to Junction 2 of the M50.
- TII advises that works to be carried out to or in close proximity to Dublin Tunnel must be subject to co-ordination with and the prior approval of TII.
- It is appropriate that specific mitigation and monitoring commitments for potential impact on the national road network are reflected in the scheme and in the proposed CEMP.
- TII advises that the Proposed Scheme includes the introduction of new infrastructure within the TII MMarC boundary, which will have consequences for liability and maintenance responsibilities.
- TII recommend conditions in relation to written agreement for plans and details of works on or in the vicinity of the national road network, long term maintenance agreements, Design Reports, written agreement of the CEMP, and written agreement of a Construction Traffic Management Plan.

Light Rail Interactions and Mitigation

- The proposed works at the junction of Parnell Street with Parnell Square East (Cavendish Row) and Parnell Square West will require a specific construction methodology approach, co-ordinated with TII and Luas operator to ensure the protection of the asset and minimal Luas service disruption.
- TII advises that works associated with the Proposed Scheme have the potential to impact on the capacity and efficiency of the Luas infrastructure and service and consider that specific mitigation and monitoring commitments for potential impact are reflected in the scheme and in the proposed CEMP.
- TII recommend conditions in relation to Overhead Conductor System poles, written agreement of the CEMP, timing of works outside of Luas operational hours, written agreement of a Construction Traffic Management Plan, access and maintenance agreement with Luas operator/TII, and the

requirement for a works permit under the Light Railway (Regulation of Works) Bye Laws 2004.

2. Fingal County Council

- FCC strongly supports the Core Bus Corridors element of the Bus Connects programme.
- In terms of planning policy, it is stated that the proposed development is in compliance with CAP23, the NPF, the NDP, the National Sustainable Mobility Policy, the National Investment Plan for Transport in Ireland, the RSES and the Transport Strategy for the Greater Dublin Area.
- The proposal is also supported by local planning policy within the Fingal Development Plan 2023-2029 particularly in the promotion of integrated land-use and transportation and the role of public transport in supporting the future sustainable and economic growth of Fingal.
- The Development Plan also highlights the South Fingal Transport Study 2019 and its recommendations (including BusConnects) for facilitating sustainable growth within the Swords and south Fingal areas, particularly before the delivery of Metrolink.
- FCC bring attention to some other land-use plans in the vicinity of the Proposed Scheme, including Barryspark and Crowscastle Masterplan, Fosterstown Masterplan, Dublin Airport LAP and Dublin Airport Masterplan.
- Sustainable Swords 2022 is a strategy that includes a public realm and transport strategy to facilitate more sustainable modes of transport to places of work and study as well as enabling recreation and tourism.
- Highlights landscape designations within the Development Plan and confirms that the proposed works to facilitate the scheme are to be carried out within the existing road corridor in an area that is predominantly urban in character.
- Highlights built heritage, archaeological and historic landscape designations within the Development Plan and requests that the scheme be designated to minimise the impact on architectural and archaeological heritage assets.

Conservation Department

- A list of protected structures and historic landscapes adjacent to the route is provided in the Council's submission. Notes that the protected structures in the Fingal area are not annotated in Figure 16.1 of Volume 3 in the EIAR.
- States that alterations to the position of the milestone (RPS No.866) at Pinnock Hill fundamentally alters the significance of the protected structure as it severs the technical link between the measurement that its placement is marking. Requests that the position of the new bus stop is reconsidered and amended to avoid re-positioning of the historic milestone.
- Requests that trees to be removed at Castlemoate House (RPS No.611) are replaced with mature trees of sufficient depth and height to provide screening from a tall hangar on the airport lands. Seeks clarity on whether there are any proposed changes to the roadside boundary and vehicular entrance to Castlemoate House and, if so, requests that the changes be agreed with the Conservation Officer.
- Concerned about the impact that the Proposed Scheme would have on the thatched cottage (RPS No.604) at Collinstown and requests that the proposal is re-designed to avoid impacting on the protected structure.
- Seeks clarity on the proposal to 'cut back'/demolish part of the demesne wall at Santry and whether this is limited to sections of the wall that have been previously amended.

Other Comments

- States that the signalisation of junctions will provide much needed safety improvements for pedestrians and cyclists.
- Requests that the NTA liaise with FCC regarding the final tie in point at the Fosterstown Link Road.
- Considers that the cycleway is incoherent at the Airport roundabout part of the scheme and will result in southbound cyclists remaining in the bus lane.
- To facilitate multi-modal trips, FCC suggests the inclusion of 10-20 bicycle stands at all CBC bus stops and not just 'where practicable'.
- Acknowledges the contents of the Flood Assessment and agrees with justification and SuDS proposals.

3. Department of Housing, Local Government and Heritage - DAU

- The Department has reviewed the EIAR and is broadly in agreement with the findings in relation to Archaeology and Cultural Heritage and recommend a condition be attached to any permission issued.

4. Dublin Airport Authority

- Welcomes the BusConnects project and considers that it will provide improved infrastructure for active travel and bus priority for staff and passengers at Dublin Airport.
- Requests that all obstacles on and adjacent to the aerodrome be illuminated with approved lighting sources and that a condition be attached to any grant of permission requiring consultation/approval by the daa.
- Requests further consultation regarding the relocation of utilities facilitating the airport and part of the security fence.
- Highlights the possible congregation of people within the Outer Public Safety Zone and associated policy for the protection of safety zones in the Fingal Development Plan 2023-2029.
- Notes that BusConnects will impact passengers travelling to the airport by private car as it will create a reduction in the operational capacity of the roads for general traffic and requests that consideration be given to ensuring the allocation of capacity to the flow of traffic east-west through the airport roundabout during the transition period to a public transport orientated future.

Recommendation

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

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

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

Liam Bowe

Liam Bowe

Inspectorate

Agreed and endorsed
For App

Appendix 1

1. Alan & Fiona Fitzpatrick

- Objects to the temporary and permanent acquisition of their lands which appears surplus to the scheme requirements.
- Inadequate information on noise mitigation measures.
- Proximity to their house making it difficult to reside in and impacting privacy.
- Inadequate information on traffic calming measures.
- Request assurances regarding road closures and minimum disruption.
- Need clarification how the existing pedestrian entrance to Seven Oaks will be impacted.
- Concerned about health and safety of their family.
- Inadequate screening and planting proposed.
- Insufficient detail on boundary treatment, lighting, removal of trees and impact on services.
- Setback distances to buildings not clarified.
- Concerned about impact on the environment.
- Lack of communication regarding the proposed scheme.
- Given no assistance in locating temporary accommodation during construction works.
- No amount of money will adequately compensate them for the losses and damages to their home.
- Alternative route could have been selected.
- They may raise other legal, design and planning matters at an oral hearing.

2. Conor O'Scanail, Scanail Veterinary Surgeons

- There is a significant extent land of land acquisition for temporary use, for delivery of a new slip road, and for the construction of a new bus lane, cycle lane and bus stop.
- The proposal will reduce the number of access points to the property / business from two to one, which will impact operational capacity.
- The change is predicted to result in a loss of five parking spaces for the business.

- The current on-site arrangement allows for the transfer of larger animals to the adjacent paddock.
- The removal of hedgerows will have implications for noise and the hospital's ability to treat horses.

3. Deirdre & Aidan O'Callaghan

- Requests clarification on trees to be removed near the Port Tunnel as these were planted to provide screening to residents.
- Request confirmation that the existing railing and wall between the Swords Road and Swords Road Slip Road will be retained.
- Trees to be removed between Whitehall Church and Whitehall Junction, and between Whitehall Junction and Gaeltacht Park should be replaced.
- Existing barriers/guardrails at each side of Whitehall Junction should be replaced/upgraded.
- Further trees should be planted outside of 219 Swords Roads and through the village itself.
- The footpath along the Swords Road Slip Road should be upgraded.
- Suggest that a light sequence at Santry Bypass Junction should include a dedicated turn for cyclists to encourage cyclists to use Shanrath Road.
- Traffic lights on Shantilla Road opposite the park should be sequenced with lights at Santry Bypass Junction to improve traffic movement.
- The paving area and wall at the Comet, and the area outside of the shops on the east side of the village should be upgraded.
- Existing barriers/guardrails at each side of Santry Bypass Junction should be removed/upgraded.
- The footpath on the lefthand side of the Shanowen Road and Santry Bypass Junction should be widened.
- The wall between Santry Bypass Junction, the Church and Whitehall Junction should be upgraded with stone facing.
- The new wall at Magenta Hall should be stone faced.
- Request a new sign for No Overtaking/Single Line Traffic Only on Collins Avenue West.

4. Ian Croft

- Concerned about the potential adverse impact this development may have on the existing traffic congestion in the area.
- Objects to the proposed location of the bus terminus at an already challenging junction to navigate with a busy shop and new housing developments consented.

5. Iona & District Residents Association

- Believe that the living environment in the district has become increasingly unsafe due to a number of traffic-related issues on the streets.
- Concerned that cut-through traffic will increase during construction works over the duration of the multi-year build of the three large projects proposed (two BusConnects corridors and Metrolink) and that, once works are completed, new traffic flow patterns can create cut through routes.
- Request a review of traffic management in the district as part of the wider design of the BusConnects and Metrolink projects.
- Provides a map illustrating a number of through routes in the district taken by motorists.
- Concerned about pollution from vehicles.
- Cut through traffic turning off arterial roads cross bicycle lanes creating risks for cyclists.
- 30-40% of vehicles in the area exceed the speed limit of 30kph.
- Road signage is regularly ignored by motorists.
- Footpaths in the area are generally not wide enough and car parking on footpaths restricts their use for mobility impaired users.
- IDRA have brought their concerns to the attention of Dublin City Council and An Garda Síochána.
- Concerned that NTA traffic modelling is not accurate.
- Seeks a traffic management plan for Iona District for the duration of the BusConnects and Metrolink construction periods.

6. Jerry & Lorraine Crowley

- The trees and shrubs planted for the protection of residents from the noise and dust generated by the operation of the Port Tunnel have worked as mitigation measures.
- Oppose the removal of mature trees and shrubs to accommodate a cycle lane.
- Oppose the cycle lane on the road as many cyclists currently use the footpath and create a risk to pedestrians/residents.
- Concerned that the cycle lane to be routed through shrubbery would create an opportunity for anti-social behaviour and illegal dumping.

7. J.J. Breen (Magners Pharmacy):

- The proposed works will cause major disruption to businesses at schoolhouse mews.
- The proposed works are excessive in nature and too long in duration.
- The removal of car parking spaces to the front of Magners Pharmacy and Eurohouse will threaten the survival of these businesses.
- The car parking spaces are needed for the loading and unloading of goods and to allow access to the pharmacy for people with limited mobility.
- Concerned about the structural integrity of the 'Old Swiss Cottage Building' during the works.

8. Juliana Boland & Others:

- Contend that there is a good bus service in operation at present and not sure of the necessity for the proposed works.
- Queries whether existing access to and parking arrangements at their property will be possible on a permanent basis during and after works.
- Queries type of boundary treatment and installation of a gate.
- Want no signage in the vicinity of their access.
- Do not want a bus stop directly opposite their properties.
- Queries times of construction activity.
- Want information about the treatment of surface water and utility services.
- Concerned about the costs involved in the arbitration process.

9. Karen Wade:

- Concerned about plans to widen the Swords Road passing through Santry via a series of CPO's.
- Contends that the scheme threatens almost every public green space in Santry.
- An expansion of the R132 would make it even more difficult to get around on foot in Santry village.
- Was not aware of the second round of public consultation.
- Works permitted and completed on a site at 1 Magenta Crescent, Santry appear to cause an obstacle to the expansion of the road at that location.

10. Kathleen McKee:

- Objects to the CPO and seeks information in relation to each and every purpose for which the CPO is made under the Housing Act, whether these purposes are wholly for purposes under the Housing Act, and whether the CPO is for the purposes of the NTA carrying out its functions under the Planning & Development Act, 2000 (as amended).
- Seeks each and every purpose that the land is required under the Planning & Development Act, 2000 (as amended), the Local Government Act, 2001 and the Dublin Transport Act, 2008.
- Seeks an indication of the basis upon which the extinguishment/restriction of the public rights of way is to be carried out.
- Seeks information on the precise details of the construction, ancillary and consequential works.
- Seeks information on the precise development of the Lands.
- Requests an extension of time for furnishing the grounds of objection pending the receipt of replies to the above.
- Contends that the Notice is invalid.
- Contends that the NTA has acted ultra vires.
- Contends that the NTA has acted in abuse of its powers.
- Contends that the NTA's decision to issue the CPO is unreasonable and/or irrational.

- Contends that the NTA has acted in breach of the constitutional rights of the landowners.
- Contends that the NTA has failed to consider the reasonable interests of the landowners.
- Contends that the NTA has failed to act in accordance with the principles of basic fairness of procedures and natural/constitutional justice.
- Contends that the NTA has failed to consider the possibility of achieving the proposed development by other means.
- Contends that the use of CPO powers by NTA for the proposed development is not an objective of the NTA.
- The potential of a private bargaining process has not been fully explored.
- Contends that the acquisition of land by the NTA is unfair and premature.
- The proposal will lead to increased traffic volumes and noise.
- The health effects of the proposed development have not been properly assessed.
- The proposed development will have a significant impact on the community in terms of health, security, general amenity and property value.
- Concerned about disruption during construction.
- The potential long-term impact on climate change has not been adequately assessed.
- The proposed development will result in a negative visual impact for residential property owners and road users.
- The proposed development will result in increased traffic congestion and operational problems on the road networks.

11. Kealy's of Cloghran:

- Concerned that the proposal will result in the creation of a long-term traffic hazard.
- Concerned that the proposal will render the existing staff/coach parking to the front of their property unusable.
- Concerned about the lack of detail on the drawings in relation to the accessibility of the car park to the rear of their property and whether traffic

accessing their property will have to queue on the Swords Road for cyclist priority at the junction.

- Concerned about the impact of the construction process on their business in the short-term and possible increase in noise levels in the long-term.
- Requests that the aesthetic quality of their property is in no way diminished as a result of the proposed scheme.
- Contend that the accessibility and noise impacts will lead to a loss of value to their and other properties.
- Request the NTA to engage directly to identify appropriate mitigation measures to prevent undue noise and access issues.

12. Lesley Henderson

- Same submission as Kathleen McKee – see above.

13. Maxol

- Not clear how the NTA will achieve two-way general traffic and two bus lanes outside the existing petrol filling station or houses opposite without any land take.
- Operator requires a minimum of 4.25m to the back of the footpath to comply with safety regulations.
- Request that location of tanking and services be considered when finalising design detail.

14. Nesta Ltd.

- Directly accessed from the lands that the NTA proposes to acquire and is concerned that this may significantly and adversely affect vehicular access to their business.
- Considers that the Order would disproportionately impact on its property rights and will diminish the value of its property and business.
- Concerned that confirmation from NTA's representative stated that continued access will be maintained to businesses affected by the works, where practicable.

- Given the nature of their self-storage business, vehicular access needs to be maintained at all times.
- Considers that the interference with vehicular access for an unknown period would be contrary to the land use zoning and the proper planning and sustainable development of the area.
- Requests that the Board refuse to confirm the CPO or amend the Order such that it will not require the acquisition of Nesta's lands.

15. Patrick Fitzsimons & Parfit

- Considers that land being acquired is excessive.
- Drainage arrangements may negatively impact the retained property and parking areas.
- Inadequate information has been provided on noise mitigation measures from the intensive bus corridor.
- Insufficient detail regarding the post-construction access arrangements.
- Lack of detail regarding traffic management during construction.
- Lack of clarity about both the temporary and permanent boundary treatments.
- Concerned about the carbon footprint during construction and both the design of the scheme and route selection.
- Lack of clarity about the impact of the scheme of footpaths and cycle paths.
- Reserve the right to raise other matters in an oral hearing.

16. Stephen Hall

- Requests that the existing trees and green spaces be preserved along Drumcondra Road and at Our Lady's Park.
- Suggests additional tree planting and greening initiatives on Dorset Street at the corner of Richmond Road and Drumcondra Road, and at bus stops.
- Emphasises the importance of the design of the new pedestrian/cycle bridge in Drumcondra.
- Urges the relevant authorities to expedite the process for the Swords to City Centre BusConnects plan.
- Encourages collaboration with DCC to enhance the public realm throughout the area.

- Requests that Parnell Square be made as safe as possible for cyclists and that the public realm be enhanced at this gateway to the city centre.

17. Tesco Ireland

- Request that any proposed alterations in the area of the service yard entrance to the Omni Shopping Centre are carefully considered and that the junction can continue to facilitate HGV access in a safe manner.
- Had requested at the Preferred Option stage that a portion of the parking outside of its Metro store on the Drumcondra Road be dedicated as a loading bay. Reiterates this request.
- Request that detailed design of the footpath and cycle track at the Drumcondra Metro facilitates the movement of stock and goods to the premises.
- Request the inclusion of a designated loading bay on Dorset Street Lower and also that detailed design of the footpath and cycle track facilitates the movement of stock and goods to the premises.

18. Bob Laird

- Fully supports the need for this development.
- No indication of how buses are going to continue with reliable journey times north of Pinnock Hill to/from Swords.
- Concerned that the proposed removal of bus stop no.3671 immediately to the north of the Airport Roundabout where the Swords and Airport bus routes meet will cause inconvenience and increased journey times for potential users.

19. Brendan Heneghan

- Resents having to pay numerous €50 fees to make submissions on a number of BusConnects applications.
- Submissions on one corridor are relevant on others:
 - Grossly deficient consultation process.
 - Grossly inflated claims of time saving.
 - Elimination of roundabouts with no explanation.
 - Wholly inadequate modelling.

- Elimination of important left-turn slip roads.
 - Moving of bus stops without notice.
 - Widespread destruction of trees.
 - Mishmash of bus gates / operational times.
 - Inadequate timescales for submissions.
 - Queries allowing NTA an opportunity for a response / 'second go' to submissions.
 - All 12 schemes should have been submitted as one application.
- Minimal time savings on all schemes does not justify the amount of money that will be spent on the projects or the invasive measures in the outer suburbs.
 - References the current no.16 bus route from Dublin Airport to Terenure as an example of a poor service.
 - Contends that there has not been adequate consideration of alternatives as required by the Aarhus Convention and gives examples of diverting the A2 and A4 services at Coolock Lane onto the motorway.
 - Queries whether the Metrolink development will remove the need for a speedy bus service from Swords.
 - Suggests that the works between the junction of Coolock Lane and the flyover at Shantalla Road not be permitted and suggests as an alternative that the A5 service run through Santry.
 - Contends that the Bórd should reject the application on the basis of an 'administrative discrepancy' where seven items were omitted from the original application and submitted on 6th July, when some members of the public may have made their submissions on the application already.

20. Oak View Residents Association

- Concerned that the proposal for the bus terminus opposite the Centra Supermarket on Coolock Lane would lead to further congestion.
- State that the imminent resubmission of a planning application for 30 plus apartments at this location will also exacerbate the parking constraints at this location.
- Includes photographs demonstrating parking at this location.

21. Residents of Griffith Downs

- Have a strong view that the permanent acquisition of a large portion of green area along the Swords Road, immediately outside of Griffith Downs, for the provision of a two-way cycle lane is unnecessary as there are two single cycle lanes already in use along this stretch of the route.
- Wish that the green space, that is maintained by the residents, be retained.
- Includes a photograph of green area affected.

22. Residents of Seven Oaks

- Object to the proposal for the provision of a two-way cycle lane between Seven Oaks and Griffith Downs as there are adequate cycle paths already in use along this stretch of the route.
- Do not wish to have their green area removed.
- State that they need an upgraded bus shelter with the removal of the metal railing positioned outside of the pedestrian entrance to Seven Oaks.

23. Leo McNamee

- Supports the BusConnects scheme but suggests the additional measure of closing St. Anne's Road to motor traffic, removing a right turn onto the BusConnects route.
- States that closing the road would create an opportunity for public realm improvements in the form of a pocket park / plaza (includes a photomontage demonstrating this).
- Contends that the road / junction closure would have widespread local support.

24. All Hallows Area Association

- States that the residents of Griffith Avenue are concerned that the project includes a CPO to permanently acquire a large strip of mature green area along the Swords Road and for the change of use of this area.

- Highlight that there is a north-bound cycle lane opposite, a south-bound cycle lane along the outer wall of Griffith Downs and, therefore, adequate provision for cycling in this area.
- Support the upgrade of the area immediately around the bus stop outside of Seven Oaks / Griffith Downs.

25. J. Murphy (Developments) Limited

- Relates to land zoned 'RA – Residential Area' at Fosterstown North.
- States that a SHD application (An Bord Pleanála Ref.: 313331-22) on these lands under consideration at present.
- Welcomes and fully supports the provision of the Swords to City Centre Bus Corridor Scheme.
- Provides an overlay of the BusConnects proposals with the proposed SHD development in Appendix 1 and requests that the proposed temporary left in/left out junction from/to the R132 in the SHD development be considered in conjunction with the proposed bus route.
- Confirms that the pedestrian crossing referenced at this location in the BusConnects proposals to the Fosterstown Metro Station is facilitated within the SHD application and a separate submission has been made to this effect on the MetroLink application.

26. Michelle Bannon & Ranjith Techeil

- Oppose the construction of a new bus terminus and set of bus stops/shelters on the green area in front of the Centra supermarket at Coolock Lane.
- Contend that the proposal would lead to further traffic congestion at this location.
- Concerned about pedestrian circulation in the parking area and the potential traffic hazard for pedestrians going to/from the supermarket.
- Concerned about the environmental impact with the loss mature trees and green space.
- Concerned about buses running their engines in wintertime and consequent noise/pollution impact.

- Suggest an alternative location for the bus terminus to the east of the Coolock/Santry roundabout on undeveloped green space adjacent to the Centra Supermarket.

27. Róisín Shortall T.D.

- Expresses her continued support for the BusConnects project, which will reduce car dependency and improve city connectivity.
- States that ambitious public transport projects will always produce unintended consequences and unforeseen problems and some outstanding issues remain for some of her constituents.
- Believes that the plan represents a missed opportunity to enhance the streetscape in Santry Village and Whitehall to address the under provision of green spaces and trees.
- Requests that the toucan crossing proposed at Northwood Avenue be designed to facilitate safe access to/from the proposed Santry River Greenway.
- States that the residents of Lorcan Road and Shanrath Road are concerned about these roads being used as 'quiet streets' and that more could be done to facilitate safe cycle lanes on the Swords Road through Santry Village.
- Given the existing issues with overnight parking at Coolock Lane, states that the residents of Oak View are concerned about the impact of the proposed bus terminus and construction compound at this location.
- Expresses regret that suggestions from local residents in relation to traffic improvements at the Omni Park Shopping Centre have not been facilitated.
- Concerned that the Santry Avenue approach to the Swords Road has been reduced to two lanes and that this may increase congestion here.
- Contends that there is poor usage of the cycle lane at the junction of Griffith Avenue and the Swords Road and that the Proposed Scheme has not addressed this.
- Concerned that inadequate consideration has been given to the needs of older people and those with a disability in the design of the Proposed Scheme. Acknowledges the addition of pedestrian crossings at the Comet Pub but disappointed that none has been proposed at Santry Close.

28. Brian O'Rourke

- Welcomes the planned investment in the local bus service but contends that there are a number of issues regarding pedestrian and cycle safety that need to be rectified.
- The proposed design of the Collins Avenue/Swords Road junction is unsuitable for pedestrians due to the excessive width of the road and number of lanes that are required to be traversed.
- The width of the Swords Road and Drumcondra Road cycle lane is too narrow (1.7m) on an uphill section to allow for overtaking.
- Contends that cyclists should have priority at 5 junctions on the cycle lane between Clonliffe Road and Botanic Avenue, per the NTA's Cycling Design Manual (2023).
- Suggests the use of Dutch kerbs at house entrances along the route in order to avoid the provision of undulating footpaths.
- Considers the existing bus lane ineffective because of other vehicles using it and requests camera enforcement and the removal of taxis to ensure public transport is not delayed by cars.

29. Santry Forum

- Propose that the bus stop at the Larkhill Road junction be relocated to area of the Comet where a bus lay-by can be accommodated and not interfere with the flow of traffic from the Whitehall flyover.
- Propose that the bus stop at the Shanowen Road junction also be relocated to area of the Comet.
- Suggest that the bus stop area at Santry Holistic Clinic can accommodate a bus lay-by.
- Suggest that the bus stop at Santry Villas should not be considered and that the bus stop area adjacent to Magner's Pharmacy can accommodate a bus lay-by.

- Propose that the bank of earth adjacent to the footpath in front of Magenta Hall be removed to facilitate a bus lane and right-turning into Omni.
- Propose the removal of on-street parking as off-street parking is available to residents.
- State that the proposed bus stop at Shantalla Road, 15m from the flyover bridge, should not be considered.
- Suggest that there may be a need to take a small triangle shaped piece of land from a garden.
- Works / land acquisition on the western side of the Swords Road would eliminate the need for lands to be acquired from the gardens of residents on the west side of the Swords Road.

30. Donal O'Brolcáin

- Contends that the need is greater than the Proposed Scheme can meet.
- Contends that the NTA already decided that a bus based public transport service could not meet the demand on this corridor.
- Contends that defective data is a feature of the proposal and cites trip generators not mentioned such as Santry Stadium, Tolka Park, Croke Park, approved residential development, possible future residential development, and schools in the area.
- Could not find main attractors / trip generators in Appendix B of the Preliminary Design Report and contends that the NTA are not up to date with recent developments.
- Draws attention to what is considered out of date information on the General Arrangement Drawings, Volume 1, EIAR.
- Concerned about the removal of the number of individual trees, groups of trees and hedgerows.

- Contends that the proposal shows a lack of awareness of recent developments in the Greater Dublin Area, such as population increase and planning permissions/developments.

31. Greater Dorset Street Together Group

- Support the BusConnects Project and view it as a once in a lifetime opportunity to enhance Dorset Street.
- A key finding of the Greater Dorset Street Project was the disconnection between both sides of the street caused by the dedication of road space to a central median and private car users.
- States that the BusConnects design proposal has not taken on board any of their suggestions.
- Disagree with the conclusion that user safety will be affected negatively if the central median is removed.
- Want BusConnects to recognise Dorset Street as a multi-functional street.
- Contend that their proposal is validated by DMURS.
- Comments on the details contained in Map No.'s 34 and 35.
- Contend that the Proposed Scheme will have a harmful impact on structures of national importance on Parnell Square (Map 36).
- A copy of the public realm improvement plan, titled: 'Greater Dorset Street Together Project', is submitted.

32. District 7 Community Alliance

- Observation on behalf of the residents and businesses in the Broadstone, Mountjoy and Dorset Street areas.
- BusConnects presents an opportunity to reimagine Dorset Street as a living street rather than a multi-lane traffic corridor between the suburbs and the city centre.

- Concerned that the measures proposed will not succeed in meeting the aims of improving accessibility to jobs, education and social activities and improving the public realm on Dorset Street.
- Highlights the lack of recognition of Dorset Street in the Community Assessment of the EIAR and contend that this lack of knowledge of the area presents in a number of errors in the General Arrangement Drawings.
- Disappointed that there is no recognition of the DCC funded, community-led public realm improvement plan: Greater Dorset Street Together Plan.
- Contend that the central median that runs from Binn's Bridge to Blessington Street has no useful purpose and the removal of this is a core enhancement proposed in the Greater Dorset Street Together Plan.
- Highlight the extent of retail / hospitality businesses between Dorset Street and North Circular Road and that the stretch does not contain a loading bay and none are included under the Proposed Scheme.
- One of the two accessible parking bays is proposed to be removed, which is stated as unacceptable given the proximity of Dorset Street to hospitals.
- Highlight the absence of a segregated cycle track on the city-bound side of the street between Blessington Street and Granby Row, and the absence of pedestrian / cycling infrastructure on Parnell Square West / Granby Row.
- Contend that the right-turn ban onto Eccles Street will create traffic, noise and pollution issues for residents of North Circular Road, Berkeley Road and Wellington Street Lower.
- Outline aspects for consideration regarding the location / relocation of bus stops along the route.

33. Dublin Cycling Campaign

- Have been engaging with the NTA through all stages of this project and only wish to highlight some remaining design issues.
- State that 50-60% of cyclists in Dublin will only cycle if provided with high-quality safe and comfortable cycle routes.
- Contend that the proposed infrastructure will provide an environment that will attract a large number of the 50-60% cohort to use their bikes for more journeys, other than in the vicinity of Dublin Airport.
- Contend that cyclists and pedestrians will be forced to make numerous and complicated crossings of slip roads and main traffic roads at both airport junctions, the Cloghran Roundabout and the Corballis Road Junction, which prioritises the private car above vulnerable road users and public transport.
- Highlight a number of other junctions that have what is considered an inconsistent treatment for cyclists along the route of the Proposed Scheme namely, Northwood Avenue Junction, Santry Avenue Junction, Shanrath/Shantalla Road Junction, Collins Avenue Junction, Griffith Avenue and other configurations at junctions towards the City Centre.
- Seeks clarity for right of ways for pedestrians and cyclists at exit points from industrial estates, business and leisure premises along the proposed route.
- Contend that any cycle track being constructed at less than 2m in width is not designed for future capacity and that it is possible to construct all cycle lanes along the proposed route to a minimum of 2m in width.
- Considers the chapters in the EIAR that cover human health to be inadequate and generalised.
- Highlight other issues:
 - Lack of clarity on the design of the 'Quiet Street',
 - Queries bus lane break at Quick Park location,

- Queries function/design of Yellow Junction Box on southbound lane to the north of Turnapin Lane Junction,
- Missed opportunity to make Church Avenue and Ormond Road one-way and thus improve overall safety,
- Lack of cycling infrastructure proposed for Dorset Street Lower,
- Allowing general traffic onto North Fredrick Street compromises the functioning of the bus lanes,
- Some design confusion at raised table crossings at side road junctions that needs to be clarified, and
- Design clarity required for the Parnell Street junction and how all modes connect to on-going routes.

34. Deirdre & Pamela Scully

- Contend that the proposal to CPO part of their front garden will result in a health hazard (auric field disturbance) due to the proximity of buses and noise / air pollution and vibrations.
- Contend that the Proposed Scheme will cause the destruction of the natural streetscape in Santry Village and the removal of trees / hedging will impact carbon sequestration.
- Contend that a one-way system would have reduced traffic congestion and cost a lot less money and request that the Board look again at the one-way option.
- Contend that the four stated underpinning principles of the NTA are being ignored for Santry Village.
- State that the bus has to move into the car lane in the manoeuvre to cross Shantalla Bridge and this will prevail under the Proposed Scheme.
- Deem the crown lifting required at Shanrath Road to facilitate a safe route for cycling to be unnecessary as they contend that cyclists will continue to use the pathway on the main road at this location to cycle through Santry Village.

- Suggests that buses use the existing motorway to shorten journey times to / from Swords.

35. Clondev Properties Limited

- Confirms their support for the Proposed Scheme and contend that such high frequency public transport infrastructure is essential for the sustainable development of North Dublin.
- Wishes to ensure that in granting permission for the Proposed Scheme due regard is had to the permission issued for 82 apartments at Hollytree House, Fosterstown (F22A/0687 refers) and certain works that the NTA require for the delivery of the BusConnects scheme on Clondev lands.
- Similarly, Clondev is part beneficial owner of lands at Pinnock Hill where permission has been granted for 204 apartments under ABP-314253-22 and now request due regard is had to the permission issued and certain works that the NTA require for the delivery of the BusConnects scheme.
- Request that an oral hearing be held in respect of the application.

36. Dublin Commuter Coalition

- Support the BusConnects Core Bus Corridors project.
- Contends that the success of the Proposed Scheme relies on the legal usage of roads by drivers and are concerned that there are no proposals for enforcement cameras as part of the project.
- Believe all proposed bus lanes and bus gates should be operational 24/7.
- Contend that two-stage pedestrian crossings are contrary to the guidance contained in DMURS and should be omitted from the Proposed Scheme (cites relevant junctions).
- Contend that some tree and four-way junctions are missing pedestrian crossings entirely (cites relevant junctions).

- Request that the NTA use Protected Junction TL501 of the Cycle Design Manual (Dutch-style junctions) throughout the project.
- Concerned about the width of bus stop islands throughout the Proposed Scheme, which may bring bicycles into conflict with passengers boarding/ alighting buses.
- In relation to shared space between cyclists and pedestrians throughout the BusConnects Programme, contend that a compromise to retain space for car traffic is prioritised over segregated or safe integration of active travel modes e.g., at Shanrath Road and Swords Road junction.
- Requests the Board to consider the provision of bicycle parking along the route in line with the provisions of the Dublin City Development Plan 2022-2028.
- Highlights concerns about pedestrian and cyclist safety at South Corballis Road junction.
- Considers the Millmount Avenue junction to be incoherent and unsafe.
- Highlights the opportunity to remove the central median on Dorset Street to create a proper urban street and public realm.
- Requests that the proposed Dorset Street junctions are replaced with safe/ suitable Dutch-style junctions (per TL504 and TL501 of the Cycle Design Manual).

37. Carmel Sherry and Celine Byrne

- Concerned about the impact that the proposed pedestrian/cycle bridge will have on Our Lady's Park both during the construction and operational phases of the Proposed Scheme.
- Suggests the re-location of accessible parking bay from Markey's shop/AIB on Drumcondra Road Lower to the end of Hollybank Road rather than the proposed re-location outside of Fagan's Pub on Botanic Avenue.

- Concerned that the proposal for a bus lane and re-location of bus stop 19 on Drumcondra Road Lower closer to the junction with Hollybank Road will make it more difficult for vehicular traffic exiting Hollybank Road.
- Considers that the re-location of bus stop 17 will improve traffic safety.
- Unclear about the maintenance arrangements for the embankment areas between on Drumcondra Road Lower between Hollybank Road and Saint Alphonsus Road during the temporary acquisition period and the commencement of the Proposed Scheme.
- Concerned that the introduction of no right-turn onto Eccles Street and the no left-turn onto Hardwicke Place from Dorset Street will restrict access to the Mater Hospital car park/ Mater Private Hospital and CHI Temple Street, respectively.
- Considers that some footpaths are proposed to be narrowed too much to facilitate cycle tracks and believes e-scooters should be directed away from shared footpaths and cycle lanes.
- States that cycle lanes should be clearly marked with a different colour/ texture than footpaths.

38. Iona and District Residents Association (2)

- Concerned about the impact that the proposed pedestrian/cycle bridge will have on Our Lady's Park both during the construction and operational phases of the Proposed Scheme.
- Suggests the re-location of accessible parking bay from Markey's shop/AIB on Drumcondra Road Lower to the end of Hollybank Road rather than the proposed re-location outside of Fagan's Pub on Botanic Avenue.
- Concerned that the proposal for a bus lane and re-location of bus stop 19 on Drumcondra Road Lower closer to the junction with Hollybank

Road will make it more difficult for vehicular traffic exiting Hollybank Road.

- Considers that the re-location of bus stop 17 will improve traffic safety.

39. Leo Street and District Residents Association & Lower Dorset Street

Community Group

- Have pointed out to the NTA that there is no conflict between the Dorset Street Together Plan and the BusConnects scheme.
- Concerned that the BusConnects scheme will resemble a motorway running along Dorset Street.
- The current proposal for Dorset Street lacks loading bays to facilitate the safe delivery of goods to the businesses on the street. Contend that this can be facilitated by the removal of the central median.
- Concerned about the deterioration in air quality to 2028.
- State that the Mater Hospital has not been consulted on the BusConnects scheme and proposed changes to traffic flow.
- Highlight that the proposed bus stop on Dorset Street Lower affects the privacy of the residents of the houses at this location.
- Contend that BusConnects does not address the greater needs of the area, which is regeneration.

40. MKN Properties Limited

- Confirms their support for the Proposed Scheme and contend that such high frequency public transport infrastructure is essential for the sustainable development of North Dublin.
- Considers that the design of the Pinnock Hill Roundabout does not accord with the objective in the Development Plan for the delivery of the Fosterstown Link Road.
- Contends that there are incoherent/ missing elements to the integration of the BusConnects, Metro and Fosterstown Link Road.

- Request that an oral hearing be held in respect of the application.

41. MPM Residents Association

- Welcomes BusConnects in general and Swords scheme in particular.
- Requests that appropriate signage in place for the routes to different parts of the Mater Hospital.
- Requests better enforcement of parking laws on Eccles Street.
- Seeks better traffic management at the area to the front of the Mater Private hospital and at Eccles Street/ Berkeley Road junction.
- Contend that changes on Dorset Street will divert traffic onto Mountjoy Street and Western Way and that traffic calming, public realm, pedestrian and cycling infrastructure improvements are needed on these streets.
- Contend that improvements for pedestrians are needed at the Parnell Square/ Granby Road junction and that the footpaths need to be widened both here and on Parnell Square.
- Fully support the plan for Dorset Street outlined by Dublin 7 Alliance in their submission.

42. Neasa Hourigan TD

- Contends that plans need to be put in place to combat illegal parking/ use on the bus lanes.
- Requests that appropriate care is taken when moving/ storing the statue in Our Lady's Park.
- Seeks clarity on accessing the Mater Hospital by car from Dorset Street when travelling inbound.
- Requests that sufficient loading bays are provided from Griffith Avenue to the city centre so that the bus/ cycle lanes are not blocked.
- Would like to see fully segregated paths for pedestrians and cyclists.

- Requests that the NTA carry out an accessibility audit of the Proposed Scheme.
- Requests that the NTA be made consider the removal of the central median on Dorset Street in favour of wider tree lined footpaths per the Greater Dorset Street Together Plan.
- Concerned that the modern design of the new pedestrian/ cycle bridge adjacent to Frank Flood Bridge is not in keeping with the prevalent architectural style of the area.
- Request that the BusConnects scheme does not prevent the implementation of a filtered permeability scheme on Richmond Road.
- Contends that the treatment of the path at the corner of Richmond Road and Frank Flood Bridge is unclear and seeks clarity on this.
- Unclear as to the treatment of the central medians proposed to the north of the Richmond Road junction and requests that these are planted with suitable trees/ shrubs.

43. MKN Investments Limited

- Confirms their support for the Proposed Scheme and contend that such high frequency public transport infrastructure is essential for the sustainable development of North Dublin.
- MKN is part owner of lands at Swords Road, Santry where permission has been granted for 324 apartments and an 81 aparthotel (Omni Living SHD) under ABP-307011-20 and requests that due regard is had to the permission issued and certain works that the NTA require for the delivery of the BusConnects scheme on lands owned by MKN and others.
- Request that an oral hearing be held in respect of the application.

44. O'Scanail Veterinary Surgeons (2)

- Concerned about the extent of land acquisition for both temporary and permanent use for the delivery of a slip road, and about the construction of a bus lane, cycle lane and bus stop to the immediate north of the site.
- Contends that the BusConnect proposal will directly impact on the commercial viability of their business by compromising access, and the standard of healthcare that they provide.
- Concerns about the loss of 6 no. car parking spaces on their site and requirement for additional turning movements and associated hazards within the site.
- Concerned about the duration of the construction phase and the impact on their services for horses.
- Considers it reasonable that the NTA engage directly with them regarding mitigation measures or, otherwise, compensation will be sought to offset potential impacts of to the monetary value of their property.
- Includes a report in Appendix A prepared by Tent Engineering Ltd. outlining changes required during the construction and operational phases of the Metrolink Scheme that would facilitate the on-going operation of the veterinary practice.

45. Brendan Collins

- Collinstown Business Park accommodates 162 no. commercial tenants including logistics, vehicle storage, motor-home rental, coach services, tyre services, fuel services, civil engineering consultancy, window suppliers and upholstery.
- Contends that the subject site is operating lawfully under its historically permitted planning applications and includes aerial photography from 2002 to 2023 demonstrating the extent of development on the site.

- Contends that the temporary acquisition of land will compromise short-term accessibility of Collinstown Business Park.
- Contends that the revised access arrangements will compromise the long-term accessibility of Collinstown Business Park.
- Confirms his support for the Proposed Scheme but considers that these impacts present a material rationale for seeking compensation.
- Lack of clarity for when the temporary land acquisition will begin or the length of time the land will be subject to temporary acquisition.
- Contends that the proposed works on his entrance are unnecessary in the context of achieving the wider objectives of the Proposed Scheme.
- Contends that the proposed works to the access arrangements to Collinstown Business Park will have a detrimental impact on traffic flow on the Swords Road.
- Reiterates that the subject site is operating lawfully with all existing commercial operations permitted in principle based on the 'General Employment' land use zoning objective in the Fingal Development Plan 2023-2029.
- Confirms willingness to engage with the NTA with the view of identifying appropriate mitigation measures or safeguarding the long-standing entrance/exit arrangement at Collinstown Business Park.

46. Collinstown Caravans Limited

- Queries Fingal County Council's reason for refusing a recent planning application for renovations and extension to the house on the site (F23B/0034 refers) and outlines the intention to use this property for residential purposes.
- Contends that the house will be rendered inaccessible by the Proposed Scheme with no pedestrian or vehicular access to the Swords Road.
- Concerned about direct impacts on residential amenity in relation to visual, noise, light pollution, and vibrations for the Proposed Scheme.

- Confirms his support for the Proposed Scheme but considers that these impacts present a material rationale for seeking compensation.
- Brings attention to the contents of Appendix A of the submission prepared by Stephen Reid Consulting Traffic & Transportation Ltd. (SRC)
- Contends that there is a pre-1963 residential use with the extant building on the site.
- Confirms willingness to facilitate the provision of a left-in left-out entrance/ exit arrangement.
- Confirms willingness to engage with the NTA with the view of identifying appropriate mitigation measures or safeguarding the residential amenity of their property.
- SRC contend that the proposed temporary acquisition does not include reinstating the existing access arrangements and, therefore, conflicts with the principle of a temporary acquisition.

47. Brittney Bennett

- Supports the BusConnects scheme.
- Requests DCC, in conjunction with the NTA, to implement filtered permeability on Richmond Road as a fundamental part of the BusConnects scheme.
- Outlines concerns regarding the use of Richmond Road including cars mounting the footpath, HGVs and unlawful short-cuts, speeding, noise pollution and emissions/ air quality.

Appendix 2

Oral Hearing Recommendation – Bus Connects Project

File Refs: ABP -317121-23

Project Title Swords to City Centre Bus Corridor

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

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

Recommendation

Having regard to the above and as per the attached memo:

- I recommend no oral hearing be held.

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

Senior Planning Inspector	Liam Bowe
Assistant Director of Planning	Paul Caprani