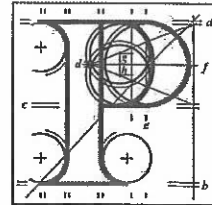


Our Case Number: ABP-313182-22



An  
Bord  
Pleanála

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

Date: 21 June 2022

Re: BusConnects Clongriffin to City Centre Core Bus Corridor Scheme  
County Dublin

Dear Sir / Madam,

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

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

The Board has also received an application for confirmation of a compulsory purchase order which relates to this proposed road development. The Board has absolute discretion to hold an oral hearing in respect of any application before it, in accordance with section 218 of the Planning and Development Act 2000, as amended. Accordingly, the Board will inform you in due course on this matter. The Board shall also make a decision on both applications at the same time.

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

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

Yours faithfully,

Niamh Thornton  
Executive Officer  
Direct Line: 01-8737247

HA02A

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Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

## Niamh Thornton

---

**From:** Elaine O'Kelly <elaine.okelly@dublincity.ie>  
**Sent:** Wednesday 15 June 2022 16:55  
**To:** Niamh Thornton; SIDS  
**Subject:** ABP Ref: 313182- 22: Bus Connects: Clongriffin to City Centre Bus Corridor Scheme scan (009).pdf; 020621 Ltr re Submission from DCC to ABP re NTA Clongriffin to City Centre Core Bus Corridor.pdf; Submission from Dublin City Council to APB re NTA Clongriffin to City Centre Core Bus Corridor Scheme.pdf  
**Attachments:**

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Niamh,

Please see attached Submission from the Executive of Dublin City Council submitted under Section 51 (2) of the Roads Act 1993 9as amended) re: National Transport Authority's Clongriffin to City Centre Core Bus Corridor Scheme **ABP REF: 313182-22.**

Please acknowledge receipt of this submission.

Regards,  
Elaine

Elaine O'Kelly| Oifigeach Foirme | An Rionn Pleanála & Forbairt Maoile  
Comhairle Cathrach Baile Átha Cliath, Bloc 4, Úrlar 3, Oifigí Cathartha, An Ché Adhmaid, Baile Átha Cliath 8

Elaine O'Kelly| Staff Officer| Planning & Property Development Department  
Dublin City Council, Block 4, Floor 3, Civic Offices, Wood Quay, Dublin 8

T +353 1 222 3082| Email: [elaine.okelly@dublincity.ie](mailto:elaine.okelly@dublincity.ie) | [www.dublincity.ie](http://www.dublincity.ie)

---

**From:** Niamh Thornton [mailto:n.thornton@pleanala.ie]  
**Sent:** Wednesday 15 June 2022 16:33  
**To:** Elaine O'Kelly <elaine.okelly@dublincity.ie>  
**Subject:** RE: Bus Connects: Clongriffin to City Centre Bus Corridor Scheme - ABP Ref: 313182

Hi Elaine,

Please see attached two letters which were issued today in relation to the above referenced case.

Your submission below could not be accepted as it was received late.

The Board is inviting Dublin City Council to make a submission by 5:30pm on 24<sup>th</sup> June, 2022.

Kind regards,  
Niamh Thornton

---

**From:** Elaine O'Kelly <[elaine.okelly@dublincity.ie](mailto:elaine.okelly@dublincity.ie)>

**Sent:** Friday 3 June 2022 09:56

**To:** SIDS <[sids@pleanala.ie](mailto:sids@pleanala.ie)>

**Subject:** Bus Connects: Clongriffin to City Centre Bus Corridor Scheme - ABP Ref: 313182

**Importance:** High

---

Hi,

Please see attached Submission for the Executive of Dublin City Council submitted under Section 51 (2) of the Roads Act 1993 (as amended).

A hard copy was posted on 2<sup>nd</sup> June 2022.

Can you please acknowledge receipt of this submission.

Regards,

Elaine

On behalf of Richard Shakespeare

Elaine O'Kelly | Oifigeach Foirne | An Rionn Pleanála & Forbairt Maoie

Comhairle Cathrach Baile Átha Cliath, Bloc 4, Úrlar 3, Oifigí Cathartha, An Ché Adhmaid, Baile Átha Cliath 8

Elaine O'Kelly | Staff Officer | Planning & Property Development Department

Dublin City Council, Block 4, Floor 3, Civic Offices, Wood Quay, Dublin 8

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Smaoinigh ar an timpeallacht sula ndéanann tú an ríomhphost seo a phriontáil. Please consider the Environment before printing this mail.



Comhairle Cathrach  
Bhaile Átha Cliath  
Dublin City Council

An Roinn Phleanála & Forbairt Maoine  
Oifigí na Cathrach, An Ché Adhmaid, Baile Átha Cliath 8  
*Offigeach Poiblí Ainmnithe faoi Acht um Brístocaireacht a Rialáil 2015*

Planning & Property Development Department,  
Block 4, Floor 3, Civic Offices, Wood Quay, Dublin 8.  
*Designated Public Official under the Regulation of Lobbying Act 2015*

T. 01 222 3800

F. 01 222 2278 E.richard.shakespeare@dublincity.ie

2<sup>nd</sup> June 2021  
An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1,  
D01 V902.

**Re: Bus Connects: Clongriffin to City Centre Core Bus Corridor Scheme**  
**ABP Ref: 313182**

Dear Sir/Madam,

Please find enclosed the Submission from the Executive of Dublin City Council submitted under Section 51(2) of the Roads Act 1993 (as amended).

If you require any further information, please contact me.

Can you please acknowledge receipt of this submission.

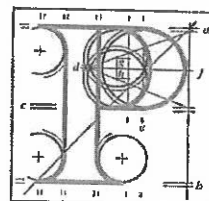
Kind regards,  
Yours sincerely,

**Richard Shakespeare**  
**Assistant Chief Executive**

Ceannoifig, Oifigí na Cathrach, An Ché Adhmaid, Bhaile Átha Cliath 8, Éire  
Head Office, Civic Offices, Wood Quay, Dublin 8, Ireland

T. 01 222 2222 W. [www.dublincity.ie](http://www.dublincity.ie)

Our Case Number: ABP-313182-22



An  
Bord  
Pleanála

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

Date: 15 June 2022

Re: BusConnects Clongriffin to City Centre Core Bus Corridor Scheme  
County Dublin

Dear Sir / Madam,

I have been asked by An Bord Pleanála to refer to the above-mentioned case.

The Board is of the opinion that in the particular circumstances of this case it is appropriate to request you to make submissions or observations in relation to the above referenced application.

Accordingly, you are requested to make any submissions or observations that you may have in relation to this application. Any submission in response to this letter should be received by the Board not later than 5.30 p.m. on 24th June, 2022

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

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

Yours faithfully,

Niamh Thornton  
Executive Officer  
Direct Line: 01-8737247

HA13

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D01 V902	D01 V902

Written Submission from Dublin City  
Council Executive to An Bord Pleanála for  
the National Transport Authority's  
Clongriffin to City Centre Core Bus  
Corridor Scheme

ABP Ref:313182



Dublin City Council  
Comhairle Cathrach Bhaile Átha Cliath

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## **Appendix 1 – Departmental Recommendations/Conditions**

## **Clongriffin to City Centre Core Bus Corridor Scheme**

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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 Clongriffin to City Centre Core Bus Corridor Scheme together with all ancillary and consequential works for the purposes of facilitating public transport.

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### **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 Clongriffin 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.

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/office 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 Office 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.

### **2.0 Description of the Proposed Development**

The Proposed Scheme has an overall length of approximately 5.7km. It is routed along the R107 Malahide Road from Mayne River Avenue – R107 Malahide Road Junction to the junction with Marino Mart – Fairview. It is also routed for cyclists via the junction with Malahide Road-Brian Road along Carleton Road, St Aidan's Park, Haverty Road and Marglann Marino, all in the County of Dublin and within the Dublin City Council (DCC) administrative area.

The Proposed Scheme will tie into two separate projects that Dublin City Council are developing at each end of the route. The southern end of the proposed scheme will tie in with the Clontarf to City Centre Cycle & Bus Priority Project that will provide segregated cycling facilities and bus priority infrastructure along a 2.7km route that extends from Clontarf Road at the junction with Alfie Byrne Road, to Amiens Street at the junction with Talbot Street in the City Centre. The northern end of the scheme will tie into a separate project being developed by Dublin City Council namely, the Belmayne

Main Street and Belmayne Avenue Scheme, which provides bus and cycle linkages to Clongriffin Dart Station.

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 construction of the Clongriffin to City Centre Core Bus Corridor Scheme within the Dublin City Council (DCC) administrative area, comprises inter alia:

- 5.7km (two-way) of bus priority infrastructure and traffic management;
- 11.9km (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 15 junction upgrades including conversion of two existing large roundabouts to signalised junctions and associated ancillary works;
- Provision of 31 new/refurbished raised table side entry facilities;
- Reconfiguration of existing bus stops resulting in 30 number new bus stop facilities;
- Public Realm works including landscaping, planting, street furniture, street lighting, retaining walls, boundary walls and sustainable urban drainage (SUDs) 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;
- Provision of new and diverted drainage infrastructure;
- Diversion of utilities and services including associated ancillary works; and
- Construction of accommodation works including boundary treatment and ancillary grading and landscaping works; together with all ancillary and consequential works associated therewith.

The project is intended to 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 45% from 36 to 52 as a result of the Proposed Scheme;
- The proportion of segregated cycle facilities will increase from 4% on the existing corridor to 100% on the Proposed Scheme; and
- The proportion of the route having bus priority measures will increase from 74% on the existing corridor to 100% on the Proposed Scheme.

The National Transport Authority have responsibility for 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). The Proposed Scheme aims to support integrated sustainable transport usage through infrastructure improvements for

active travel (both walking and cycling), and the provision of enhanced bus priority measures for existing (both public and private) and all future bus services who will use the corridor.

The scope of this report deals with demonstrating how the proposed overall development is in accordance with Dublin City Development Plan 2016-2022 policies and objectives.

## **2.1 Relevant Planning History**

Significant planning applications along and adjacent to the route including;

- An application for Strategic Housing Development at Site 2, Mayne River Avenue, Northern Cross, Malahide Road, Dublin 17 (ABP planning reference TA29N.307887) was granted in 2020;
- An application for Strategic Housing Development at Newtown, Malahide Road, Dublin 17 (SHD0026/19 and SHD0026/19A) granted in 2020;
- An application for an Aviation Fuel Pipeline from Dublin Port to Dublin Airport (ABP planning reference PL29N.245738) was granted in 2016;
- An application for Street Refurbishments along Belmayne Main Street and Belmayne Avenue (DCC planning reference 4214/18). This approved scheme will provide bus and cycle linkages to Clongriffin Dart Station and will tie in with the current proposal for BusConnects.
- An application for Strategic Housing Development at Clarehall, Malahide Road, Dublin 17 (SHD0007/19) granted in 2019.
- An application for Strategic Housing Development at the Former Chivers Factory Site, Coolock Drive, Coolock, Dublin 17 (SHD0018/20) granted in 2020.

## **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 principle 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 namely: place making; 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. Local Level:**

### **2.2.2.1 Dublin City Development Plan 2016-2022**

The Dublin City Development Plan 2016-2022 recognises the need for an efficient, integrated, and coherent transport network as a critical component of the Development Plan's Core Strategy. The City Council 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 City Development Plan 'Movement and Transport' sets out the Council's policies and objectives which are relevant to BusConnects.

For convenience, the most relevant policies are quoted here:

**MT2** *Whilst having regard to the necessity for private car usage and the economic benefit to the city centre retail core as well as the city and national economy, to continue to promote modal shift from private car use towards increased use of more sustainable forms of transport such as cycling, walking and public transport, and to co-operate with the NTA, Transport Infrastructure Ireland (TII) and other transport agencies in progressing an integrated set of transport objectives. Initiatives contained in the government's 'Smarter Travel' document and in the NTA's draft transport strategy are key elements of this approach.*

**MT3** *To support and facilitate the development of an integrated public transport network with efficient interchange between transport modes, serving the existing and future needs of the city in association with relevant transport providers, agencies and stakeholders.*

**MT4** *To promote and facilitate the provision of Metro, all heavy elements of the DART Expansion Programme including DART Underground (rail interconnector), the electrification of existing lines, the expansion of Luas, and improvements to the bus network in order to achieve strategic transport objectives.*

**MT5** *To work with the relevant transport providers, agencies and stakeholders to facilitate the integration of active travel (walking, cycling etc.) with public transport, thereby making it easier for people to access and use the public transport system.*

**MT7** *To improve the city's environment for walking and cycling through the implementation of improvements to thoroughfares and junctions and also through the development of new and safe routes, including the provision of foot and cycle bridges. Routes within the network will be planned in conjunction with green infrastructure objectives and on foot of (inter alia) the NTA's Cycle Network Plan for the Greater Dublin Area, and the National Cycle Manual, having regard to policy GI5 and objective GIO18.*

**MT11** *To continue to promote improved permeability for both cyclists and pedestrians in existing urban areas in line with the National Transport Authority's document 'Permeability – a best practice guide'. Also, to carry out a permeability and accessibility study of appropriate areas in the vicinity of all Luas, rail and BRT routes and stations, in co-operation with Transport Infrastructure Ireland and the National Transport Authority.*

**MT13** *To promote best practice mobility management and travel planning to balance car use to capacity and provide for necessary mobility via sustainable transport modes.*

**MT20** *To increase capacity of public transport, cycling and walking, where required, in order to achieve sustainable transportation policy objectives. Any works undertaken will include as an objective, enhanced provision for safety, public transportation, cyclists and pedestrians, and will be subject to environmental and conservation considerations.*

**MT23** *To improve facilities and encourage relevant transport agencies/transport providers to provide for the needs of people with mobility impairment and/or disabilities including the elderly and parents with children.*

#### **2.2.2.1.1 Strategic Development and Regeneration Area (SDRA 1) North Fringe (Clongriffin-Belmayne)**

While the Local Area Plan (LAP) for Clongriffin-Belmayne sets out the statutory local context for guiding the development of this area, SDRA 1 of the City Development Plan sets out the key guiding principles for development as set out in the LAP. The principle of transport oriented sustainable, mixed use urban development is support by the SDRA. The LAP sets out specific objectives (see below).

#### **2.2.2.1.2 Area Specific Plans**

This section references the following plans currently active within the area of the proposed route.

##### **2.2.2.1.2.1 Clongriffin-Belmayne Local Area Plan**

The proposed route is located (in part) within the Clongriffin-Belmayne Local Area Plan (the LAP). The LAP was adopted in 2012 and extended by resolution for a further period of five years until December 2022.

There have been changes to CBC1 route since the publication of the Emerging Preferred Route. With specific reference to the LAP, the proposal no longer includes the section from Clongriffin train station to Malahide Road via Main Street. CBC1 now commences at the Mayne River Avenue / Malahide Road junction, instead of at Clongriffin train station. CBC1 Preferred Route Option Report, November 2021 notes that this was due to the existing cycle and bus lanes along Main Street and DCC's progression of the Belmayne Main Street and Belmayne Avenue Scheme. CBC1 Preferred Route Option Drawings indicate that CBC1 will connect to the Belmayne Main Street and Belmayne Avenue Scheme.

CBC1 is generally supported by the policies and objectives of the LAP.

#### **2.2.2.1.2.2 Belmayne and Belcamp Lane Masterplan**

Belmayne and Belcamp Lane Masterplan (the Masterplan) was prepared in 2020 for lands at Belmayne and Belcamp Lane at the Malahide Road Junction (R139/R107) as required by the Clongriffin–Belmayne Local Area Plan. The Masterplan is intended as a guide for the implementation of the LAP as it relates to these lands. The Masterplan will shape the future development of the lands providing guidance on issues such as building height, street layout, land use, block arrangement, housing density, public amenities and access and movement.

The Masterplan envisages upgrading Belcamp Lane in order to provide a new street between the Malahide Road and the R139 (west of the Malahide Road junction). This connection will help maximise the potential of these lands and provide a connection to the north. The Masterplan states that the final function of this new connection will be subject to further studies.

#### **2.2.2.2 The Draft Dublin City Development Plan 2022-2028 – Relevant Policies**

Although not the statutory planning context for the assessment of development proposals, the draft City Development Plan, scheduled for adoption in operation by December 2022, 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.

***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 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 infrastructure.*

***QHSN10 15 Minute City:** To promote the concept 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, safe and inclusive public spaces served by local services, amenities and sustainable modes of transport.*

***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.*

***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.

**SMT11 Pedestrians and Public Realm:** To enhance the attractiveness and liveability of the City through the continued reallocation of space to pedestrians and public realm.

**SMT13 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.

**SMT18 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.

**SMT20 Key Sustainable Transport Projects:** To support the delivery of key sustainable transport projects including Metrolink, Bus Connects, DART+ and LUAS expansion programme so as to provide an integrated public transport network with efficient interchange between transport modes, serving the existing and future needs of the city and region.

#### **2.2.2.2.1 Strategic Development and Regeneration Area (SDRA) 1 Clongriffin/Belmayne and Environs**

This section draws attention to SDRA 1 Clongriffin/Belmayne and Environs in the Draft Dublin City Development Plan 2022-2028. The rationale for designating the area as a SDRA is to provide a strategic spatial and urban design framework to guide future development and ensure that the phasing and implementation strategy envisaged in the LAP can be delivered as part of the future build-out of the lands when the LAP expires in December 2022.

Under 'Urban Structure' the completion and upgrade of Main Street from Clongriffin train station to the Malahide Road, linking the two Key Urban Villages (KUVs) by high quality public transport, walking and cycling infrastructure is noted. The SDRA supports the Core Bus Corridor utilising Main Street, linking Clongriffin train station to the city centre and supporting public transport interchanges.

The provision of a new link street 'Belcamp Parkway', along Belcamp Lane between Malahide Road and the R139 with a new signalised junction off Malahide Road is noted as a permeability intervention in the SDRA (as envisaged in the LAP and Masterplan). This connection is noted as a western access to the Belcamp Lane lands and key to facilitating future development potential. The Clongriffin to City Centre Core Bus Corridor Scheme, Location Maps, March 2022 does not indicate any future upgrades to Belcamp Lane. It is important that the Core Bus Corridor Scheme does not preclude the future permeability intervention envisaged or the development of the Belcamp Lane lands.

## **2.3 Departmental Reports**

The following Dublin City Council Departments and Divisions submitted a report and their response has been incorporated into the Planning Authority's Report:

- Environment and Transportation Department – including comments from the Traffic Division, Public Lighting Division, Environmental Protection Division and Roads and Planning Division Archaeology Division
- Conservation Section
- City Architects Division
- City Parks, Biodiversity and Landscape Service
- Air and Noise Pollution Unit

Additional comments from the various departments etc. are provided in the appendix.

## **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 local planning level, the Dublin City Development Plan 2016-2022 sets out policies and objectives required to achieve the Core Strategy of the plan. The proposal has been considered with regard to the 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 ABP is the competent authority with regard to the acceptability or otherwise of the EIAR it is not for 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.

The Natura Impact Statement prepared by the applicant identifies the following SPA and SAC designated areas in the vicinity of the proposed development:

Baldoyle Bay SAC	2.4km distance
Rockabill to Dalkey Island SAC	7.2km
Howth Head SAC	6.4km
Lambay Island SAC	13.4km
Ireland's Eye SAC	7.2km
Malahide Estuary SAC	4.9km
Rogerstown Estuary SAC	10.2km
North Dublin Bay SAC	2.7km
South Dublin Bay SAC	3.3km
Glenamole Valley SAC	14.8km
Wicklow Mountains SAC	14.4km
Ireland's Eye SPA	7km
Howth Head Coast SPA	8.3km
South Dublin Bay and River Tolka Estuary SPA	0.5km
Lambay Island SPA	13.3km
Rogerstown Estuary SPA	10.4km
Baldoyle Bay SPA	2.8km
North Bull Island SPA	2.7km
Malahide Estuary SPA	5.5km
Wicklow Mountains SPA	14.7km
Howth Head Coast SPA	8.3km
Dalkey Islands SPA	13.1km
Skerries Islands SPA	19.2km
Rockabill SPA	19.7km
The Murrough SPA	31.4km

The City Council considers that the submitted Natura Impact Statement is generally satisfactory in terms of identifying the relevant Natura 2000 sites and the potential adverse impacts on the integrity of designated Natura 2000 Sites along the Dublin coastline in view of their conservation objectives. There is considered to be sufficient distance from the intended route of the bus corridor to SAC and SPA sites, and the avoidance, design requirements and mitigation measures set out in the NIS will ensure that any impacts on the conservation objectives of European Sites will be avoided during the construction and operation of the proposed scheme such there will be no adverse effects on any European Sites.

The Natura Impact Statement objectively concludes that the development will not adversely affect (either directly or indirectly) the integrity of any European Site, either alone or in combination with other plans or projects and there is no reasonable scientific doubt in relation to this conclusion.

#### **2.4.4 Zoning and other designations**

The application boundary that incorporates the proposed scheme includes lands within the following zoning objectives; Z1 (Residential), Z3 (Neighbourhood Centres), Z4 (District Centres), Z6 (Employment/Enterprise Zones), Z9 (Open Space), Z12 (Institutional Land with Development Potential), Z14 (Strategic Development and Regeneration Areas) and Z15 (Institutional and Community). The proposed scheme for the most part will comprise lands within the existing public road and pedestrian area where there is no specific zoning objective.

The proposed scheme passes through a small section of the conservation areas at the junction of the Malahide Road and Greencastle Road and at The Marino Casino. Given the nature and extent of the proposed scheme it is unlikely to have a negative impact on the visual amenities of the Conservation areas.

Appendix 21 of the DCDP defines a 'Public Service Installation' as follows:

*'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 proposed scheme would be compatible and consistent with the zoning objectives for the area, being a public service installation.

#### **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. The Planning Authority considers that 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. 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 Department of Dublin City Council**  
CBC1 is fundamental to achieving the strategic objectives envisaged in the *Clongriffin-Belmayne Local Area Plan* and *Belmayne and Belcamp Lane Masterplan* and the forthcoming *Dublin City Development Plan 2022-2028* (SDRA 1), pertaining to: compact and sustainable urban growth; sustainable mobility and permeability; and place making, while significantly contributing towards climate action. While the CBC1 is supported, it is important that the Core Bus Corridor does not preclude the future development of the Belcamp Lane lands, as envisaged in current and forthcoming *Dublin City Development Plan 2022 - 2028*.

As noted, the statutory Local Area Plan for part of the area covered by the proposed scheme will expire in December 2022. This will be replaced by SDRA 1 of the draft Dublin City Development Plan 2022-2028. In general, the proposed scheme is supported by the high level policies in place.

#### **2.4.7 Environment and Transportation Department Comments**

##### **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 obligated 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
- 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.

#### **2.4.7.1 Traffic Department**

The Traffic Department 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 and that as per section 7.1 of the TIA appendix "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.

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

#### **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.

#### **2.4.7.2 Roads Department**

##### **Movement Hierarchy**

The Bus Connects project seeks to radically improve bus and cycling infrastructure which is welcomed. It is noted that improvements to the pedestrian network are identified including the provision of signalised crossings. It is also noted that while mode share substantially increases for bus and cycling, mode share for walking generally remains static which may be attributable to the improvements in public transport and cycling provisions.

As a principle, the Proposed Scheme should seek to not reduce existing available footpath widths except where absolutely necessary and to seek to improve the pedestrian environment including pedestrian connectivity to bus stops.

##### **Ensuring Pedestrian Priority**

In recognition of the movement hierarchy, pedestrians should always be considered first in any design. This is particularly important having regard to more vulnerable pedestrians with accessibility and visibility.

There are other elements of the Scheme where cycle lanes run behind and across bus stops and between parking areas and the footpath. Again, measures should be put in place in these areas that slow cyclists and require them to yield to pedestrians. Buffer strips are also required to protect pedestrians alighting from cars, potentially older citizens or those with small children, buggies and wheelchairs.

##### **Awareness, Education and Behavioural Change Programme**

In the context of the above, and if the Board is minded to grant permission for the Scheme, it is recommended that the Board consider the requirement for the National Transport Authority to undertake a substantial awareness, education and behavioural change programme.

##### **Impact on Loading and Servicing**

Dublin City Council recognises that all parts of the City's administrative area have to cater for a wide range of competing demands with public transport, pedestrians, cyclists, the private car, and the functional and servicing needs of the city economy being all active users of the existing road space. A key challenge is to balance these competing demands whilst facilitating the development and delivery of important public transport infrastructure, cycling infrastructure and ensuring the city remains a vibrant, attractive and accessible area for all. It is also important with regards to the concept of the 15 Minute City to ensure that access to local goods and services are retained within neighbourhoods to ensure people walk or cycle within these areas. Safeguarding the ability of local services to operate is therefore imperative.

It is noted the Proposed Scheme results in the loss of car parking spaces at existing commercial units, a reconfiguration of existing parking arrangements and changes to Pay and Display/Permit Parking. To ensure adequate loading/set down areas are provided in these areas, in the event of a grant of permission, a condition should pertain to ensure that any necessary changes to the Pay and Display

parking and associated line markings are agreed with the Planning Authority in order to provide adequate set down/loading for these commercial units.

#### Impact on Car Parking

It is accepted that the majority of spaces lost are informal on street residential spaces where in some instances, haphazard perpendicular parking currently occurs and the Proposed Scheme will serve to regularise some of this informal parking. Alternative spaces within reasonable distances (c. 100-200metres) are noted as being available.

It is noted in the Compulsory Purchase Order (CPO) Deposit Maps that there is some land take proposed in front gardens in order to accommodate the Proposed Scheme, thereby reducing the existing driveways/gardens of these properties. In accordance with Appendix 5 of the Dublin City Development Plan 2016-2022 (and the forthcoming Draft City Development Plan 2022-2028), to ensure safe off street parking within the curtilage of a dwelling that does not overhang onto the public footpath, the basic dimensions to accommodate the footprint of a car are 3 metres by 5 metres. There should also be adequate space to allow for manoeuvring and circulation between the front boundary and the front of the building.

#### **2.4.7.3 Public Lighting Department Comments and Recommended Conditions**

Public Lighting has provided a commentary and recommended conditions – see appendix

#### **2.4.7.4 Environmental Protection Division Comments and Recommended Conditions**

Dublin City Development Plan 2016-2022, 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 Urban Drainage Systems 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 storm water. These requirements will be further strengthened in the Dublin City Development Plan 2022-2028.

Under the EU Water Framework Directive there is a requirement to protect and improve water quality in all waters, including surface waters. An existing segregated surface water drainage network will service the proposed Clongriffin CBC, which outfalls to a number of protected waterbodies that are identified as Priority Areas for Action under the Water Framework Directive's 2nd and 3rd River Basin Management Plans. These contiguous waterbodies, for example the River Santry & Lower Tolka Estuary, are protected waterbodies under Article 4 of the Water Framework Directive. Currently both waterbodies are of 'moderate' 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 Clongriffin CBC 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 surface water chemical status, in accordance with our obligations.

DCC has initiated the River Santry Restoration and Greenway Project, which has an estimated capital expenditure of over €50 million. This environmental scheme is contiguous with the proposed Clongriffin CXBC scheme. The EPA, LAWPRO and the National Transport Authority support the project, which is also part funded by URDF monies. The Clongriffin CBC project proposal will significantly influence the achievement of this environmental project's objectives and the NTA should engage with the local authority in a meaningful and demonstrative manner to contribute to the achievement of the WFD objectives of 'good' water quality status.

#### **2.4.8 Air and Noise Pollution Unit Comments**

The only comments this Unit would have would be with respect to the construction phase of the project. The potential increase in noise and air pollution levels owing to road widening and an increase in the traffic counts for buses would form part of the EIS submitted by the applicant. Transport Infrastructure Ireland may comment on this. This Unit has no remit in this regard.

#### **2.4.9 Archaeology Department Comments**

##### Statutory Protection

The Clongriffin to City Centre Core Bus Corridor Scheme will run through the Zone of Archaeological Constraint for two Recorded Monuments listed on the Record of Monuments and Places (RMP) and are subject to statutory protection under Section 12 of the National Monuments (Amendment) Act 1994, as follows:

- On the Malahide Road the route runs through the Zone of Archaeological Constraint for the Recorded Monument DU018-006 (bridge). This refers to Donnycarney Bridge (1896), which spans the Donnycarney River and replaced an ancient stone structure known as Scurlogues Bridge ([www.archaeology.ie](http://www.archaeology.ie)).
- At the south end of the Malahide Road the route runs through the Zone of Archaeological Constraint for the Recorded Monument D018-067 (burial site), where human burials were unearthed during the construction of the Georgian houses at Marino Crescent ([www.archaeology.ie](http://www.archaeology.ie)).
- The Proposed Scheme runs immediately adjacent to the Zone of Archaeological Constraint for the RMP recorded monument DU015-074 (mound), which may be prehistoric in nature. It will not affect the setting of the recorded monument, and is well screened from the route in its immediate setting within the Cadbury's Factory grounds.

The above RMP sites are listed as Sites of Archaeological Interest in the Dublin City Development 2016-22. It is the policy of the Dublin City Development Plan 2016-22 (Section 11.1.5.15 CHC9) to protect and preserve monuments: 1. To protect archaeological material in situ by ensuring that only minimal impact on archaeological layers is allowed, by way of the re-use of buildings, light buildings, foundation design or the omission of basements in the Zones of Archaeological Interest. 2. That where

preservation in situ is not feasible, sites of archaeological interest shall be subject to 'preservation by record' according to best practice in advance of redevelopment.

#### Industrial Heritage

On the Malahide Road the bus corridor crosses two bridges listed on the Dublin City Industrial Heritage Record (DCIHR Refs: 15\_13\_009 (Coolock Bridge) and 18\_04\_010 (Donnycarney Bridge). No specific works are noted at either of these sites, however any potential works should take account of the historic fabric and subsurface archaeological material associated with earlier bridge sites.

#### EIAR and mitigation

Chapter 15 of the EIAR focuses on the archaeological and cultural heritage implications of the scheme. This was written by Lisa Courtney and Dr Claire Crowley of Courtney Deery Ltd and provides a comprehensive baseline archaeological survey, with reference to the relevant guidelines and statutory policy. Section 15.4.1 of the EIAR discusses ground-breaking works required for the construction of the Proposed Scheme which may cause impacts to archaeological heritage. These comprise:

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

Archaeological monitoring, under license to the NMS, with subsequent preservation by record/in situ/by design is proposed in the EIAR as mitigation (Section 15.5.2) at the following locations:

- At the site of a house depicted on the 1843 OS map, south of the Newtown Road/R107 Malahide Road Junction.
- At the site of the proposed pocket park on Bothar Mhullach Ide / Brookville Park, outside the Cadbury's Factory which is adjacent the RMP ZAP for a recorded mound (RMP DU015-074).
- At the site of Coolock Bridge (DCIHR 15-13-009) outside the Cadbury's Factory on the Old Malahide Road / R107 Malahide Road.
- At the recorded Donnycarney Bridge site (RMP DU018-006) on the R107 Malahide Road.
- Within the ZAP for burial site RMP DU018-067 on the R107 Malahide Road/Marino Mart.

No significant residual archaeological impacts are identified in the EIAR either in the Construction or Operational Stage of the scheme.

This office has reviewed and concurs with the broad methodology for archaeological monitoring as outlined in the EIAR. The methodology will be iterative as the design develops and the finer detail of the methodology should be adapted and updated accordingly throughout the design phase.

#### **2.4.10 Conservation Department Comments**

The Conservation Section acknowledge the need to improve public bus services within the city and are supportive of this objective in principle. However, it is submitted that these works should, where possible, avoid material loss to the city's architectural heritage and serious impact on its streetscapes.

Many of the existing roads and streets throughout the city follow historic routes into the city and are lined with buildings and boundaries that vary in age, design and materiality, scale and use, with trees

and landscaping features within the property boundaries and the public domain, all of which contribute to the unique character of the city of Dublin. This report refers in particular to the impacts on architectural heritage.

This assessment has been carried on the information available on the Bus Connects website <https://clongriffinsscheme.ie> and reviewed in the context of the provisions of the Dublin City Council Development Plan 2016 – 2022, the Architectural Heritage Protection Guidelines for Planning Authorities (2011), the Advice Series published by the Department of Housing, Local Government and Heritage, International Charters and best conservation practice. Some of the routes extend beyond the remit of Dublin City Council, and the architectural heritage impacts on these areas have not been assessed.

The impacts of the proposed development on Protected Structures and buildings within Architectural Conservation Areas, Conservation Areas, Residential Conservation Areas (Z2) and Architectural and Civic Design Character Areas (Z8), have been considered in the context of the provisions of the Dublin City Council Development Plan 2016 – 2022, including the policies and objectives of Chapter 11 – Built Heritage and Culture, Chapter 16 – Development Standards and all relevant appendices.

#### General Response

The Conservation Section welcomes the comprehensive assessment on Architectural Heritage (Chapter 16 and Appendix 16) submitted as part of the EIAR.

The Conservation Section note the comprehensive assessment of the impact of the proposed routes on the architectural heritage, streetscape and urban environment generally and welcome the proposed mitigation measures across the scheme.

#### Summary of key impacts

Having regard to the information submitted the following are considered by the Conservation Section to be the key impacts of the CLONGRIFFIN TO CITY CENTRE route in relation to architectural heritage Protected Structures:

- Protected Structures/proposed Protected Structures and their setting:
  - Three protected structures (milestones; RPS 4862, 4859, 4854): It does not appear that these will be significantly impacted by the proposed works and that they are to be retained in their existing locations. These structures require protection from potential impact during the construction phases of the project.
  - Two protected structures (houses; RPS 4852 & 4853) where boundaries are being altered: it is noted that the front boundaries are later replacements, however the proposals represents some erosion of the curtilage of the protected structures.
  - It is noted that RPS 4855 (Mount Temple Gate Lodge), RPS 4893-4915 (1-25 Marino Crescent) are situated along the route of the project but there are no direct impacts proposed.

- Buildings and other non-Protected Structures (post boxes/milestones etc.) included in the National Inventory of Architectural Heritage (NIAH)
  - Church of our Lady of Consolation (NIAH 50130252) – a bus stop is indicated along a prominent axis point of the side elevation of the church on the route mapping which will negatively impact on the setting of the church. The note on the drawings submitted states that this is an existing bus stop that is to be retained. However, the existing bus stop is located further south beyond the church. Confirmation of the exact location of this stop is required and it is recommended that the existing stop be retained.
  - Terrace of 9 houses at 20-36 (even nos.) Malahide Road whose boundaries will be impacted as a result of land acquisition (NIAH 50120095). Though there have been some alterations to these boundaries to form vehicular entrances, they retain historic railings on parapet walls and are an important contributor to the special character of these structures and the streetscape.
  - Three post boxes along Malahide Road (NIAH 50130246, 50030291 & 50120091). These structures require protection from potential impact during the construction phases of the project..
  - Former electricity substation at the junction of Malahide Road and Clontarf Road (NIAH 50120122). This structure will require protection from potential impact during the construction phases of the project.
  - Marino Health Centre (NIAH 50120063) – it is proposed to locate a bus stop in front of this structure. However, the existence of a grassed area and trees between the structure and the proposed bus stop will help mitigate the visual impact of the bus shelter on the amenity of the historic structure.
- Structures on the Dublin City Industrial Heritage Record Survey (DCIHR)
  - Coolock Bridge (DCIHR 15 13 009) – only the west elevation of the bridge survives with the east elevation impacted by the widening of Malahide Road. However, further fabric may survive beneath the road surface. The upstanding surviving parapet wall of the bridge requires some repair work to be carried out under the supervision of a conservation professional in accordance with the provisions of the Architectural Heritage Protection Guidelines for Planning Authorities (2011).
  - Donnycarney Bridge (DCIHR 18 04 010) – The west parapet is the only visible surviving element of this bridge, with the watercourse it crossed also no longer visible. The surviving parapet of this bridge is similar to other bridges in north Dublin that were constructed in the 1890s. It replaced an earlier bridge in this location and is a noteworthy element of the transport heritage of the area. The surviving parapet is to be protected during the construction phases and any repair works are to be carried out under the supervision of a conservation professional in accordance with the provisions of the Architectural Heritage Protection Guidelines for Planning Authorities (2011).
  - Electricity Substation (DCIHR 18 04 012) – see NIAH 50120122 above.
- Architectural Conservation Areas and Conservation Areas
  - The route runs along part of the eastern boundary of the Marino Casino ACA. There are no historic boundaries or features impacted by the proposed project works.

- Lands zoned Z2 in the Dublin City Council development Plan 2016-2022, which aims to “protect and / or improve the amenities of residential conservation areas.”
  - The proposed route includes lands zoned Z2 in Marino along Haverty Road, Carleton Road and St. Aidan’s Park Road. It is noted that minimal works are proposed at these locations.

Seventy eight properties in total will be impacted by the proposed widening – boundaries, gardens etc. including structures noted above. It is not clear what the permanent impact on boundaries and gardens will be as the documentation and drawings refer to Temporary Land Acquisition along with permanent acquisition. The drawings only indicate the temporary acquisitions. As noted above, the variety of boundaries along Malahide Road provides a commentary on the evolution of the city’s residential areas and make a notable contribution to their local areas.

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

- There is surviving historic kerbing at the entrance to Mount Temple School. These are to be retained however these historic ground surfaces require protection from potential impact during the construction phases of the project.
- Kerbing/cobbles are visible at the entrance to Clontarf Golf Club (formerly Donnycarney House, including surviving historic gate piers). It is not clear if these are historic ground surfaces and their provenance should be ascertained in advance of works. These features add to the architectural character of the former entrance to Donnycarney House and it is recommended that they be retained and protected during the proposed construction works.
- Surviving historic lampposts have been identified on Haverty Road, Carleton Road and St Aidan’s Park Road. These require protection from potential impact during the construction phases of the project.
- There is a surviving cast-iron bollard, possibly from an early lamp standard, along the boundary of Clontarf Golf Club. This should be retained in-situ and protection from potential impact during the construction phases of the project.
- A post box not recorded by the NIAH is located along Malahide Road, to the north of the junction with Collins Avenue; this post box is to be relocated as part of the works. The recording of the post box in its current location prior to its removal and the supervision of the work by a conservation professional will be required.

#### Impacts on Architectural Heritage arising from Proposed Tree Removal

The proposed removal of trees will have a significant impact on the architectural character and setting of the following historic buildings:

- The loss of planting through land acquisition adjacent to the protected structures RPS 4852 & 4853 in tandem with the impact on boundaries along this section of Malahide Road will have a significant impact on the setting of these protected structures.
- Mature trees are also noted along the west boundary of Clontarf Golf Club, which is located on and incorporates the former Donnycarney House; the impact on these trees is not clear. The loss of these trees would have a negative impact on the former historic demesne

landscape including the setting of the adjacent Mount Temple gate lodge, a protected structure.

#### Historic Paving, Setts, Kerbing & Associated Features

- Proposed works to any roads and streets with historic surfaces including paving, setts, setted drainage channels, kerbing and associated features such as original coal-hole covers, traditional manhole covers, and stone and cast-iron bollards shall have regard to the provisions of Appendix 7 and Appendix 8 of the Dublin City Council Development Plan 2016-2022.
- All practicable measures to avoid loss of or damage to historic street surfaces, materials and features shall be taken having regard to Section 14.4.1 of the Architectural Heritage Protection Guidelines for Planning Authorities (2011), and to the Department of Housing, Local Government and Housing Advice Series on 'Paving: The Conservation of Historic Ground Surfaces' (2015).
- 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.
- Proposed alterations to existing historic paving and kerbing has the potential to impact upon the architectural character of an area. All historic paving surfaces and associated features should be retained and protected as far as practically possible. All works to historic street surfaces and associated features to be designed and supervised by an expert in architectural conservation in accordance with the provisions of the Architectural Heritage Protection Guidelines for Planning Authorities (2011), and to the Department of Housing, Local Government and Housing Advice Series on 'Paving: The Conservation of Historic Ground Surfaces' (2015).

#### Boundary Treatments

Boundary treatments including walls, railings, gates and gate piers contribute to the special character of Protected Structures and their settings, ACA's and areas zoned Z2 in the Dublin City Council Development Plan 2016-2022. Where historic boundary treatments survive, they should be retained and preserved in situ as far as practically possible. Where their relocation is unavoidable, consideration should be given to carefully relocating boundary features to a suitable alternate location and ensuring that consistency is maintained across all boundary reinstatements and that new boundaries are on a like-for-like basis, retaining the historic character of the streetscape. All works to be designed and supervised by an expert in architectural conservation in accordance with the provisions of the Architectural Heritage Protection Guidelines for Planning Authorities (2011) and relevant documents of the DHLGH Advice Series.

The removal and reinstatement of existing boundary treatments to unprotected structures should be carefully considered, particularly where these are of some quality and reflect a considered design intent respond to the parent structure through the use of complementary detailing and materials. Although it is stated that new boundary treatments will match the existing boundaries, it is noted that this is subject to discussion with landowners. A review of the photomontages submitted, suggest that the detailing and design of modest yet character defining boundary walls/gate piers/gates, particularly to early 20th century housing schemes will not be replaced on a like-for-like basis, reflecting an erosion

of character (refer to existing and proposed View 01 – loss of gate piers having stepped capping to 20th century housing along Malahide Road (Kilmore Road Junction); View 03 – loss of crenelated boundary walls and gate piers having pebble-dashed panels to 20th century housing along Malahide Road (opposite) junction with Clancarthy Road; and View 04 – loss of cement harled boundary treatments, gate piers and wrought iron gates to early 20th century housing development along Malahide Road (Collins Avenue Junction)).

#### Historic Street Furniture

The survival of historic street furniture makes a significant contribution to the character and setting of our streetscapes. These may include milestones, jostle stones, city ward stones, bollards, coal hole covers, gratings, boot scrapers, cast iron basement (or pavement) lights, street skylights and prisms, water troughs, street furniture, post boxes, lampposts, railings and historic ground surfaces including stone kerbs, pavement flags and setts. Historic street furniture may be given statutory protection in their own right as a Protected Structure, as part of the curtilage of a Protected Structure or as part of an ACA. Where historic street furniture survives, consideration should be given to preserving these by rerouting corridors or by carefully moving these to a suitable, alternate location. Note that mile stones are specific to their locality and where possible should be retained in-situ. Existing historic features on or adjoining the route require protection from potential impact during the construction phases of the project in accordance with conservation best practice. Any proposed works to be designed and supervised by an expert in architectural conservation in accordance with the provisions of the Architectural Heritage Protection Guidelines for Planning Authorities (2011) and relevant documents of the DHLGH Advice Series. Where relocation is unavoidable, a detailed conservation method statement shall be prepared by the supervising conservation expert for the written agreement of the Planning Authority prior to the commencement of works at the location/project construction phase..

#### Gardens & Trees

Open spaces, gardens (regardless of size) and landscape features make an important contribution to the character and setting of Protected Structures and their settings, ACA's and areas zoned Z2 and Z8 in the Dublin City Council Development Plan 2016-2022. The Architectural Heritage Protection Guidelines (2011) state that 'the loss of garden may seriously affect the setting and character of a Protected Structure or of an ACA' (pg.202). Mature trees and hedges should be retained, where practicable, particularly where these form part of special setting of a Protected Structure, an ACA or a Conservation Area.

#### Car Parking in Protected Structures and ACAs

The impact of the proposed bus corridor on existing on-street car parking may lead to subsequent incremental proposals for private off-street parking, placing additional development pressure on open spaces as well as boundary features as front and rear gardens are converted or altered to accommodate car parking. The individual and cumulative effect of such alterations may injure the special interest of a Protected Structure. Poorly designed off-street parking in the front gardens of protected structures and in designated Architectural Conservation Areas can have an adverse effect on the special interest and character of these buildings and areas. Where site conditions exist that can facilitate parking provision without significant loss of visual amenity and historic fabric, all practicable

measures to avoid loss of or damage to historic gardens and boundary treatments shall be taken having regard to Policy 16.10.18 of the Dublin City Council Development Plan 2016-2022.

#### Proposed Bus Stops and Protected Structures/ACAs

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 Architectural Conservation Areas. Measures shall be required to mitigate the visual impact of bus stops / shelters / information posts sited near or fronting Protected Structures and Architectural Conservation Areas.

#### 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. Signage should be kept to the necessary minimum. Proposed works in the vicinity of Protected Structures and Architectural Conservation Areas to be designed and supervised by an expert in architectural conservation in accordance with the provisions of the Architectural Heritage Protection Guidelines for Planning Authorities (2011) and relevant documents of the DHLGH Advice Series. The Conservation Section of DCC recommend that consideration is given to the rationalisation of all signage across the Bus Connects routes to reduce visual clutter.

#### New cycle lanes

Limited information pertaining to cycle lanes has been submitted. It is noted that cycle lanes are proposed with red tarmac surfacing which may have some negative impact on historic areas. 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. Proposed works in the vicinity of Protected Structures and Architectural Conservation Areas to be designed and supervised by an expert in architectural conservation in accordance with the provisions of the Architectural Heritage Protection Guidelines for Planning Authorities (2011) and relevant documents of the DHLGH Advice Series.

### **2.4.11 City Architects Department Comments**

The City Architects Division welcomes 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 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 proposals for public realm upgrades, including widened footpaths, high quality hard and soft landscaping contribute towards a safer, more attractive environment for pedestrians are included, 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:

- Generally, existing survey drawings are submitted with a project to facilitate analysis and the extent of intervention in a proposal. The General Arrangement Drawings submitted as part of the National Transport Authority's Clongriffin to City Centre Core Bus Corridor Scheme are drawn at a scale of 1:500@A1 and do not include an overlay of existing survey drawings.
- By comparison, the Part 8 planning application submitted in 2015 by Dublin City Council for the Clontarf to City Centre Cycle Route (which connects into this BusConnects Clongriffin to City Centre Core Bus Corridor Scheme) was drawn at a larger scale of 1:250 and included an overlay of existing survey drawings.
- The inclusion of an overlay of existing survey drawings onto the General Arrangement Drawings as submitted for the Clongriffin to City Centre Core Bus Corridor Scheme would have facilitated a better assessment of the impacts of the proposals on the existing public realm. This issue was raised in previous City Architects commentary.
- Comments will generally be confined to proposed physical interventions in the public realm only, with minimal or no commentary on traffic routing or modelling.
- Where drawings are referenced in the commentary, the relevant Drawing Sheet no. from Volume 3, Figures, Chapter 4.2 General Arrangement Drawings is included for ease of reference.

Commentary by the City Architects Division on the Proposed Scheme is limited to a review of the following documents only contained within the Environmental Impact Assessment Report of the planning documentation:

Volume 1, Non-technical Summary  
Volume 2, Chapter 4 Proposed Scheme Description  
Volume 3, Figures, Chapter 4.2 General Arrangement  
Volume 3, Figures, Chapter 4.4 Typical Cross Sections  
Volume 3, Figures, Chapter 4.5 Landscaping General Arrangements

See appendix for more detailed recommendations/conditions

#### **2.5.12 Parks, Biodiversity and Landscape Division**

1. There appears to be a loss of active recreation facilities (football pitches) and a loss of general amenity space within Mayfield Park, Donnycarney. This has not been mitigated within the

plans and there appears no community gain to offset the loss of amenity space and active recreation provision.

2. The Plans issued to ABP are at a Scale of 1:500. It is very difficult to read these plans in particular their impact on existing footways and soft landscape areas; as a result these comments need to be viewed within that context.
3. 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.
4. No indicative details have been submitted as part of the works, it is unclear therefore how viable some of the proposals are.
5. It recommended that an Arborist and Landscape Architect be appointed and retained on site for the duration of the works to ensure trees indicated for retention are retained and proposed soft landscape is successful delivered.

## **2.6 Conclusion**

The Clongriffin 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 2016-2022 as well as the draft 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 2016-2022.

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 the appendix attached to this report.

## **APPENDIX: Departmental Recommendations/Conditions**

### **Conditions - Dublin City Council and the National Transport Authority**

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 seek, to the extent practicable, to incorporate the requirements of the DCC departments into the final detailed design of the Scheme.

### **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 work on either the existing or new traffic signals.

### **Roads Division**

The Scheme shall ensure that principles of universal design are adhered to and accessibility requirements are met throughout the Scheme.

1. Alterations to pay and display scheme/line markings/signage pole shall be agreed with the Planning Authority to ensure adequate loading and set down is provided.
2. Modifications to existing in-curtilage car parking should aim to ensure where possible a footprint of 5 metres by 3 metres for car parking is retained.
3. 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.

### **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.

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.

It must be noted that special consideration must be given to the fact that a small section of the Clongriffin to City Centre Corridor route has street lights that are mounted on ESB Networks Infrastructure.

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.

### **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 any development from a surface water/drainage/flood management perspective are outlined as follows:

1. The detailed drainage design shall be in accordance with the agreed conditions in regard to consultation during the detailed design process 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 NTA and any damage rectified. Any diversions shall be agreed in writing, prior to commencement, with Drainage Planning, Policy and Development. Details on proposed connection locations to the surface water network and flow discharges shall also be agreed.

2. This development should comply where possible with the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0 (available from [www.dublincity.ie](http://www.dublincity.ie) Forms and Downloads). In particular:
3. 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 prior to commencement of construction. Soft landscaping should be considered before hard landscaping.
4. The SuDS design should refer to the new Dublin City Council Sustainable Drainage Design and Evaluation Guide published in 2021.
5. The section of the proposed Clongriffin CBC from Newtown Cottages (Chainage A4500) to Saint Brendan's Drive (Chainage A5550) is within the River Santry catchment. The NTA shall consult with Dublin City Council's Protection of Water Bodies office as to the potential for this runoff to be collected and treated as part of the latter's SuDS Pilot Project in that catchment.
6. The NTA shall confirm in writing to Drainage Planning, Policy and Development 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.
7. Any changes in ground profile shall be modelled to demonstrate no increase in flood risk and to reduce it where reasonably possible. In particular, no new properties to be flooded at the Mayne River and at Malahide Road / Collins Avenue East junction (Donnycarney).
8. 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 applied to all areas.

#### **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-noise-control-unit/good-practice-guide-construction-and-demolition>

## Archaeology

It is strongly recommended that subject to a grant of planning permission, the NTA appoints a Project Archaeologist to help to prepare specifications for the archaeological services contract and ensures that due attention is given to best practice and value for money. S/he will then oversee the subsequent programme of archaeological monitoring and full excavation. On completion of the fieldwork phase of this work, the Project Archaeologist will oversee all post-excavation analysis, reporting and publication. The Project Archaeologist should work closely with the Project Team and Consultant Archaeologists, and draw up specifications for each archaeological component of the project, and certify all related costs.

Any significant finds made during construction phase should be reported to the statutory authorities (the National Monuments Service) and the City Archaeologist alerted immediately. Where possible, any archaeological features recorded during monitoring should be preserved in situ. Industrial heritage features (e.g. tramlines) should be treated as archaeological features and subject to full preservation by record where their removal be deemed necessary by the City Archaeologist.

## Conservation

### Mitigation Measures

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 repair works will be carried out in accordance with best conservation practice with no unauthorised or unnecessary damage or loss of historic fabric, 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 2016-2022, 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, buildings on the NIAH and DCIHR, and structures and features in Architectural Conservation Areas (ACAs) across the Bus Connects routes shall be submitted to the Planning Authority for its approval.
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, Architectural Conservation Area or Conservation Area.
6. All works shall be carried out in accordance with best conservation practice and 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.

#### **City Architects**

##### Siting of utility cabinets and above-ground utility infrastructure:

1. 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 street furniture:

2. A full palette of street furniture and their proposed locations, shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

##### Per cent for Art Strategy:

3. The selection and location of artworks along the route as part of the Percent for Art strategy shall be reviewed and agreed with the local authority Arts Office and submitted to, and agreed in writing with, the planning authority prior to commencement of development.

## Parks, Biodiversity and Landscape Services

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1. Parks and Landscape Services Division recommends that all soft landscape proposals are agreed with this division prior to detail design; including details of numbers of trees, hedge planting and species.
2. Details of tree pit construction to be agreed with Parks and Landscape Services prior to commencement of development
3. The proposed layout contains a large number of rain gardens, these are specialist landscape drainage features which will need intensive maintenance in order for planting to successfully establish along with expertise from the drainage department. It is recommended that the NTA fund and maintains these for a minimum of 10 years post practical completion.
4. The layouts indicate a number of landscape features within Parks managed spaces including paths, tree and mixed meadow planting. Notwithstanding any potential community gain from such elements, the proposed works should be confined to the permanent red line boundary of the corridor and all mitigation planting and SUDS works should be contained within the permanent road corridor.
5. The proposed scheme show Rain Gardens and SUDS measures around existing mature trees and within the Root Protection Area of these trees. These rain gardens and SUDS elements have to be shown to not compromise the health and safety of the trees before installation.
6. It is recommended that tree planting species should be planted with a minimum girth of 16-18cm with a minimum of 3 years post practical completion maintenance to ensure healthy establishment.



Richard Shakespeare,  
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