

An
Bord
Pleanála

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

Date: 13 July 2022

Re: BusConnects Belfield/Blackrock to City Centre Core Bus Corridor Scheme
Co. 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 216 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,

Sarah Caulfield
Executive Officer
Direct Line: 01-8737287

HA03A

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Sarah Caulfield

From: Sarah Caulfield
Sent: Tuesday 12 July 2022 16:09
To: elaine.okelly@dublincity.ie
Cc: Niamh Thornton
Subject: RE: ABP Ref: 313565; DCC Submission for NTA Belfield/Blackrock to City Centre Core Corridor Scheme

Dear Elaine,

The Board acknowledges receipt of your email and attached submission in relation to the above-mentioned application.

Kind Regards,
Sarah

From: Elaine O'Kelly <elaine.okelly@dublincity.ie>
Sent: Tuesday 12 July 2022 16:06
To: SIDS <sids@pleanala.ie>
Cc: Niamh Thornton <n.thornton@pleanala.ie>
Subject: ABP Ref: 313565; DCC Submission for NTA Belfield/Blackrock to City Centre Core Corridor Scheme
Importance: High

Hi,

Please see attached written submission from Executive of Dublin City Council to An Bord Pleanála for the National Transport Authority's Belfield/Blackrock to City Centre Core Bus Corridor Scheme.

Please acknowledge receipt of this submission.

Regards,
Elaine

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

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

ABP Ref: 313565



Dublin City Council

Comhairle Cathrach Bhaile Átha Cliath

Contents:

1.0	Application
1.1	Scope of Report
2.0	Description of the Proposed Development
2.1	Relevant Planning History
2.2	Policy Context
2.2.1	Regional Level
2.2.2	Local Level
2.2.2.1	Dublin City Development Plan 2016-2022
2.2.2.2	Area Specific Plans
2.2.2.3	Draft Dublin City Development Plan 2022-2028
2.2.3.4	Draft Area Specific Plans
2.3	Departmental Comment
2.4	Planning Assessment
2.4.1	Planning Policy
2.4.2	Environmental Impact Assessment Report (EIAR)
2.4.3	Natura 2000
2.4.4	Zoning and other designations
2.4.4.1	Land Use Zoning Objectives
2.4.4.2	Built Heritage Objectives
2.4.5	Impact on Amenity
2.4.6	Strategic Observation from the Forward Planning Section
2.4.7	Environment and Transportation Department Comments
2.4.7.1	Traffic Division Comments
2.4.7.2	Roads Division Comments
2.4.7.3	Public Lighting Section Comments
2.4.7.4	Environmental Protection Division Comments
2.4.7.5	Air and Noise Pollution Unit Comments
2.4.8	City Archaeologist Comments
2.4.9	Conservation Section Comments
2.4.10	City Architects Division Comments
2.4.11	City Parks, Biodiversity and Landscape Division Comments
2.4.12	City Arts Officer Comments
2.5	Conclusion

Appendix 1 – Recommended Conditions

Blackrock/Belfield to City Centre Core Bus Corridor Scheme

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

1.1 Scope of Report

In accordance with Section 51(3)(b) of the Roads Act 1993 (as amended), this submission sets out the views of Dublin City Council (a prescribed body), on the Belfield/Blackrock to City Centre Core Bus Corridor Scheme and the potential effects 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 Transport 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 8.3km. It is routed along (1); the R113 Temple Hill (from approx. 80m north of the R827 Stradbroke Road), the N31 Frascati Road, the R118 Rock Road/Merrion Road/Pembroke Road, the R816 Pembroke Road/Baggot Street Upper/Baggot Street Lower and Fitzwilliam Street Lower, terminating at the junction with Mount Street Upper/Merrion Square South/Merrion Square East, and (2); Nutley Lane commencing at the tie-in with the signalised junction on the R318 Stillorgan Road and terminating at the junction with the R118 Merrion Road, all in the County of Dublin and within the Dublin City Council and Dún Laoghaire-Rathdown County Council administrative areas.

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

The proposed scheme comprises the following:

- 8.3km (two-way) of bus priority infrastructure and traffic management;
- 16.6km (total both directions) of cycling infrastructure and facilities;
- Provision of new/refurbished pedestrian facilities and footpaths along the scheme and associated ancillary works;
- Provision of 27 no. junction upgrades and associated ancillary works;
- Reconfiguration of existing bus stops resulting in 46 no. 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;
- Construction of accommodation works including boundary treatment and ancillary grading and landscaping works, and
- 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 include the following:

- Inbound bus lanes will increase from 3.2km to 7.4km in length.
- Outbound bus lanes will increase from 2.9km to 7.3km in length.
- Bus priority in both directions will be increased from 6.1km to 16.6km.
- Segregated inbound cycle lanes will increase from 0.4km to 8.3km.
- Segregated outbound cycle lanes will increase from 0.3km to 8.3km.
- Pedestrian signal crossings will increase from 68 no. to 96 no.

The sections of the proposed scheme within the administrative area of Dublin City Council comprise the following public roads and associated junctions:

- Merrion Road (R118)
- Pembroke Road (R118 & R816)
- Baggot Street Upper and Baggot Street Lower (R816)
- Fitzwilliam Street Lower
- Nutley Lane (including tie-in to Stillorgan Road)

The boundary of the proposed scheme includes areas of land-take to facilitate the construction and operational phases of the development. Off-line traffic control measures are proposed on Clyde Road and Pembroke Park in conjunction with the proposed scheme.

The majority of the proposed scheme passes through the outer suburbs of the city including the historic villages of Merrion and Ballsbridge. The proposed scheme crosses the River Dodder at Balls Bridge and the Grand Canal at McCartney Bridge, before entering the Georgian core of the south inner city via Baggot Street Upper.

The construction phase for the proposed scheme is anticipated to take approximately 24 months to complete and will be based on individual sectional completions that will have shorter individual durations typically ranging between three and thirteen months. The construction compound would be located in Booterstown Car Park, within Blackrock Park. A Construction Environmental Management Plan and a Construction Management Plan have been submitted with the application.

The National Transport Authority has 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 the route include:

- **Maldron Hotel and Tara View (site of former Tara Towers Hotel);** Permission granted for 140 no. bedroom hotel and apartment block (reg. ref. 3608/17).
- **Elmpark Green Business Campus;** Permission granted for 73 no. apartments in a block to rear (west) of campus (reg. ref. 3743/19 & ABP-307424/20).
- **St. Vincent's University Hospital;** Ten-year permission granted for Strategic Infrastructure Development primarily comprising new national maternity hospital at St. Vincent's University Hospital (ref. Part X/0018) .
- **Former Gowan Motors Compound Site (169-177 Merrion Road);** Permission granted for apartment development containing 46 no. units (reg. ref. 4477/19 and ABP ref. 307591-20, as amended by reg. ref. 4051/21).
- **Former Gowan Motors Site (143 Merrion Road);** Permission granted for apartment development (63 no. units).
- **Former AIB Banks Centre Site;** Permission granted for 2 no. office buildings fronting Merrion Road (reg. ref. 2064/19 and ABP PL29S.246717).
- **20 Merrion Road;** Permission granted for replacement office building (Glencar House) and restaurant at No. 20 Merrion Road (reg. ref. 4120/21).
- **Jury's and Berkeley Court Hotel Site;** Ten year planning permission granted for demolition of Jury's Hotel and Berkely Court Hotel and construction of a mixed-use development (568 no. apartments and 9,805sq.m of commercial uses) on Site 1 and Site 2 (reg. ref. 4015/09 and ABP PL29S.237454). Lifetime of permission has been extended under reg. ref. 4015/09x1.
- **Hume House (128-138 Pembroke Road);** Permission granted for replacement office building (reg. ref. 4155/18 and ABP-303806019).
- **Carrisbrook House (122 Northumberland Road);** Council decision to grant permission for replacement office building with ground floor commercial uses (reg. ref. 4120/21) under appeal to An Bord Pleanála (ABP ref. 313812).
- **74-75 Baggot Street Lower;** Permission granted for replacement office building at junction of Baggot Street Lower and Wilton Terrace (reg. ref. 4166/16 and ABP PL29S.248884).
- **ESB Headquarters;** Permission granted for redevelopment of ESB Headquarters (reg. ref. 3052/14 and ABP PL29S.244492) including demotion and replacement of all 20th century office facilitates and renovation and reuse of Georgian house.

Permitted structures within the public road include:

- Permission granted for refurbishment of existing kiosk previously containing coffee shop on traffic island at junction of Pembroke Road and Northumberland Road (reg. ref. 4385/17).
- Permission granted for free-standing digital advertising structure to front of SPAR on Baggot Street Upper (reg. ref. WEB1460/17).
- Permission granted for replacement bus shelters incorporating digital advertising in public footpath on either side of Baggot Street Upper (reg. ref. WEB1416/18 and WEB1417/18).
- Part 8 proposed for double sided metropole advertising structure on traffic island at junction of Pembroke Road and Herbert Road (reg. 2975/16) approved.
- Permission granted for replacement bus shelters incorporating advertising panels to front of 54 Merrion Road, the Clayton Hotel, Merrion Shopping Centre (reg. ref. WEB1421/18, WEB1419/18 and WEB1420/18).
- Permission granted for replacement telephone kiosk incorporating information and advertising panels in public footpath adjoining St. Vincent's University Hospital (4384/19).

- Part 8 proposal for metropole in public footpath to front of Caritas Convalescent Centre approved (reg. ref. 2804/10).

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 National Planning Framework. 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 policies and objectives which are relevant to BusConnects.

For convenience, the relevant policies and objectives 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.

MT12 To improve the pedestrian environment and promote the development of a network of pedestrian routes which link residential areas with recreational, educational and employment destinations to create a pedestrian environment that is safe and accessible to all.

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.

MTO4 To support improvements to the city's bus network and related services to encourage greater usage of public transport in accordance with the objectives of the NTA's strategy and the government's 'Smarter Travel' document.

MTO10 To improve existing cycleways and bicycle priority measures throughout the city, and to create guarded cycle lanes, where appropriate and feasible.

MTO45 To implement best practice in road design as contained in statutory guidance and in the DMURS (the use of which is mandatory) with a focus on place-making and permeability (for example, by avoiding long walls alongside roads) in order to create street layouts that are suited to all users, including pedestrians and cyclists.

MTO47 To develop a city centre pedestrian network which includes facilities for people with disabilities and/or mobility impairments based on the principles of universal design.

The following policies of the Dublin City Development Plan with regard to the public realm are of relevance:

SC2 To development the city's character by cherishing and enhancing Dublin's renowned streets, civic spaces and squares.....

SC20 To promote the development of high-quality streets and public spaces which are accessible and inclusive, and which deliver vibrant, attractive, accessible and safe places and meet the needs of the city's diverse communities.

SC21 *To promote the development of a built environment and public spaces which are designed to deter crime and anti-social behaviour, which promote safety and which accord with the principles of universal design, as set out in the Dublin City Public Realm Strategy.*

CHC45 *To continue to animate the public domain by encouraging the provision of public art, temporary and permanent, across all art forms and artistic disciplines in the city centre and in neighbourhoods through such mechanisms as the government-supported Percent for Art scheme and the development management process.*

The Proposed Scheme relates to an area containing structures and features of built heritage value and street trees. The following policy in respect of these assets is of relevance:

CHC1 *To seek the preservation of the built heritage of the city that makes a positive contribution to the character, appearance and quality of local streetscapes and the sustainable development of the city.*

CHC2 *To ensure that the special interest of protected structures is protected.....*

CHC4 *To protect the special interest and character of all Dublin's Conservation Areas. Development within or affecting a conservation area must contribute positively to its character and distinctiveness, and take opportunities to protect and enhance the character and appearance of the area and its setting, wherever possible.....*

CHC15 *To preserve, repair and retain in situ, historic elements of significance in the public realm including railings, milestones, city ward stones, street furniture, ironmongery, and any historic kerbing and setts identified in Appendices 7 and 8 of the development plan, and promote high standards for design, materials and workmanship in public realm improvements. Works involving such elements shall be carried out in accordance with the Department of Arts Heritage and the Gaeltacht Advice Series; Paving, the Conservation of Historic Ground Surfaces (McLoughlin 2017).*

CHC9 *To protect and preserve National Monuments.....*

GI14 *To promote the development of soft landscaping in public open spaces, where feasible, in accordance with the principle of Sustainable Urban Drainage Systems.*

GI28 *To support the implementation of the Dublin Tree Strategy, which provides the vision for the long-term planting, protection and maintenance of trees, hedgerows and woodlands within Dublin City.*

GI30 *To encourage and promote tree planting in the planning and development of urban spaces, streets, roads and infrastructure projects.*

2.2.2.2 Area Specific Plans

There are no area specific plans along the route of the Proposed Scheme.

2.2.2.3 The Draft Dublin City Development Plan 2022-2028 – Relevant Policies

Although not the statutory planning context for the assessment of Proposed Scheme, the draft Dublin City Development Plan indicates the policy direction that is likely to set the planning and development context for the city over the next six years. Several policies are of relevance to 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.*

2.2.2.4 Draft Area Specific Plans 2022-2028

No area specific plans are proposed along the route of the proposed scheme under the Draft Dublin City Development Plan 2022-2028.

2.3 Departmental Comments

The following Dublin City Council Departments and Divisions submitted a report and their response has been taken on board as part of the Planning Authority's Report:

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

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 and walking 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 has been submitted with the application examining the project under all relevant headings and finds generally that the development would not adversely impact on existing environmental amenities. As An Bord Pleanála is the competent authority with regard to the acceptability or otherwise of the EIAR it is not for Dublin City Council to comment in this regard but it

is noted that the content points 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 of importance 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:

South Dublin Bay SAC	Immediately adjoining
North Dublin Bay SAC	4.7km
Rockabill to Dalkey Island SAC	5.3km
Howth Head SAC	9.2km
Wicklow Mountains SAC	9.3km
Knocksink Wood SAC	9.3km
Ballyman Glen SAC	9.7km
Baldoyle Bay SAC	10.1km
Glenasmole Valley SAC	11.4km
Bray Head SAC	12.2km
Ireland's Eye SAC	13.3km
Malahide Estuary SAC	13.5km
Lambay Island SAC	21.7km
South Dublin Bay and River Tolka Estuary SPA	Immediately adjoining
North Bull Island SPA	4.7km
Dalkey Islands SPA	5.3km
Wicklow Mountains SPA	9.6km
Baldoyle Bay SPA	10.1km
Howth Head SPA	10.6km
Ireland's Eye SPA	13km
Malahide Estuary SPA	13.7km
Rogerstown Estuary SPA	18.4km
Lambay Island SPA	21.5km
The Murrough SPA	22.7km
Skerries Islands SPA	27.7km
Rockabill SPA	28.3km

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. The proposed avoidance, design requirements and mitigation measures set out in the NIS to ensure that any impacts on the conservation objectives of European Sites will be avoided during the construction and operation of the Proposed Scheme such that there will be no adverse effects on any European Sites are noted.

Whilst An Bord Pleanála is the competent authority for the purposes of carrying out an Appropriate Assessment of the proposed scheme, it is noted that the submitted Natura Impact Statement objectively concludes, following an examination, analysis and evaluation of the relevant information,

including in particular the nature of the predicted impacts from the proposed scheme, and subject to the implementation of the identified mitigation measures, that the proposed scheme will not adversely affect (either directly or indirectly) the integrity of any European Site, either alone or in combination with other plans or projects.

2.4.4 Zoning and Other Designations

2.4.4.1 Land Use Zoning Objectives

For the greatest part the proposed scheme relates to lands within the existing public road where there is no specific zoning objective. The following land use zoning objectives apply to lands along the proposed scheme:

Z1: *To protect, provide and improve residential amenities.*

Z2: *To protect and/or improve the amenities of residential conservation areas.*

Z3: *To provide for an improve neighbourhood facilities.*

Z4: *To provide for and improve mixed-services facilities.*

Z6: *To provide for the creation and protection of enterprise and facilitate opportunities for employment creation.*

Z9: *To preserve, provide and improve recreational amenity and open space and green networks.*

Z15: *To protect and provide for institutional and community uses.*

Merrion Road:

Primarily zoned Z1 and Z2. Notable exceptions include:

- Elmpark Green Campus; Z6 and Z1
- St. Vincent's University Hospital and St. Mary's Home and School for the Blind; Z15
- 230-240 Merrion Road; Z3
- Merrion Shopping Centre; Z4
- RDS Arena; Z15 and Z9
- Former AIB Bank Centre campus; Z6
- Ballsbridge Village; Z4

Pembroke Road:

Primarily zoned Z2. Notable exceptions include:

- Ballsbridge Village; Z4
- American Embassy, office buildings at No. 83-91 Pembroke Road, Hume House and Carrisbrook House; Z6
- Ballsbridge Hotel; Z6 (as per Variation No. 32 to City Development Plan)

Baggot Street Upper:

Primarily zoned Z4. Modern commercial buildings known as Baggot Plaza (BOI offices) and Waterloo Exchange (mixed-use) zoned Z6.

Baggot Street Lower:

Primarily zoned Z8. Office developments at Mlesian Plaza, Confederation House and No. 74 & 76 Baggot Street Lower zoned Z6.

Fitzwilliam Street Lower:

Zoning objective Z8.

Appendix 21 of the Dublin City Development Plan 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.'

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

Public service installations are compatible with the Z1, Z2, Z3, Z4, Z6, Z9 and Z15 zones along the Proposed Scheme, being listed as a permissible use in all of these zones i.e. a use which is generally acceptable in principle in the relevant zone, but which is subject to normal planning consideration, including policies and objectives outlined in the Dublin City Development Plan.

2.4.4.2 Built Heritage Designations

Protected Structures

McCartney Bridge (road bridge over the Grand Canal) is listed on the Record of Protected Structures (RPS No. 872). There is a significant number of protected structures along the route, many of which form part of building groups such as the 18th and 19th Century terraces on Pembroke Road, Baggot Street Upper and Lower and Fitzwilliam Street Lower, and the enclave of estate cottages on Estate Avenue.

Conservation Areas

The proposed scheme traverses Conservation Areas as delineated by a red hatch on Maps E and H of the City Development Plan at the following locations:

- Balls Bridge / River Dodder crossing.
- Baggot Street Upper, McCartney Bridge / Grand Canal crossing, Baggot Street Lower and Fitzwilliam Street Lower.

Archaeology

The proposed scheme includes zones of archaeological interest as shown on Maps E and H of the City Development Plan at the following locations:

- Area surrounding burial ground on Merrion Road.
- Area at junction of Pembroke Road and Eastmoreland Place.

Other Built Heritage

Appendix 8 of the City Development Plan lists the following streets along the proposed scheme as having paved areas, granite kerbing and/or some other traditional features to be retained or restored:

- Baggot Street Lower
- Fitzwilliam Street Lower

2.4.5 Impact on Amenity

Dublin City Council is satisfied that the elements of the proposed scheme which fall within the administrative area of the Council would not have any adverse or undue impact on the amenities of adjoining properties or the wider 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 impacts on existing amenities. Once complete the proposed scheme will provide for an attractive, safe and universally accessible public realm along the core bus and cycle facilities, which will enhance the amenities of the area and provide for a more efficient urban transport network. The proposed public realm enhancements at Ballsbridge Village and Baggot Street Upper are welcomed.

Notwithstanding the foregoing, the Planning Department considers that the proposed bus shelters on Fitzwilliam Street Lower and Baggot Street Lower, and the proposed street trees on Fitzwilliam Street Lower should be omitted in order to protect the historic character of these Georgian streetscapes. It is also recommended that any advertising within the proposed bus shelters be subject to a separate planning application. Whilst the Planning Department acknowledges that a number of trees will need to be removed to facilitate the proposed scheme, the loss of mature trees of value should be minimised and, where unavoidable, compensated for accordingly.

2.4.6 Strategic Observation from the Forward Planning Section

The Belfield/Blackrock to City Centre Core Bus Corridor Scheme will help to achieve the strategic objectives envisaged in the forthcoming Dublin City Development Plan 2022-2028 pertaining to: compact growth; sustainable mobility and permeability; and place-making, while significantly contributing towards climate action. While the scheme is supported, it is important that the Core Bus Corridor adequately addressed conservation impacts along the route.

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 Division Comments

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 the proposed scheme operates on a managed headway basis. Therefore, the corridor cannot be operated in isolation and must in fact be a managed corridor such that the DCC traffic control system is constantly managing requests for priority and has the necessary information to determine what level of priority is appropriate in order to maintain an even headway on the corridor.

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

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

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

The use of Bus Gates and Queue relocation along Merrion Road to compensate for the lack of continuous bus lanes along both sides of Merrion Road provides challenges for how the corridor will be managed during operation. The enhanced data garnered by DCC from the next Generation AVL system and the next generation Bus priority system currently being specified will play a key role in how the corridor is dynamically managed to ensure that the bus journey times and headways are met.

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

It is noted that the design at the Merrion Gates junction allows for connection at some point to a potential Strand Road cycle scheme and this is welcomed. As the junction is integrated with the Irish Rail infrastructure in terms of operation, during the detail design process the exact interface with the Irish Rail system and the location of infrastructure will have to be carefully assessed.

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 Division Comments

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 not to have to reduce existing available footpath widths except where absolutely necessary and 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 may also be required to protect pedestrians alighting from cars, potentially 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. Removing the possibility for servicing and loading can have detrimental impacts on the viability of local businesses.

It is noted the Scheme results in the loss of car parking and loading bay spaces, and the impact on available loading space within the city needs to be carefully considered. To ensure adequate loading/setdown 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. Where loading/setdown areas have not been clearly demonstrated, the identification of these areas should be confirmed with the Planning Authority.

2.4.7.3 Public Lighting Section Comments

See appended recommended conditions.

2.4.7.4 Environmental Protection Division Comments

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 Drainage Systems (SuDS) should be integrated with all other environmental aspects of a project, using best practice solutions. DCC requires this softer engineered approach to be used to manage surface water at source as it is a greener, more environmentally effective approach for managing stormwater. These requirements will be further strengthened in the Dublin City Development Plan 2022-2028.

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

- This development must comply with the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0 (available from www.dublincity.ie Forms and Downloads). In particular:
 - Continuous Kerbs incorporating drainage, as outlined in Figure 2, Page 3 in Appendix K Drainage Design Basis Document, are not accepted by DCC Drainage Planning, Policy and Development.
 - Enclosed drainage channels such as slot drains or "ACO" drains are not accepted by Drainage Planning, Policy and Development.
 - The hybrid gully outlined in Section 1.1.3, Page 4 in the BusConnects - Road run-off collection gullies Technical Paper is not accepted by DCC Drainage Planning, Policy and Development. The use of narrow profile gullies as previously agreed is welcome.

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

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

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

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

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

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

New compensatory SuDS measures should be close to any green areas lost. In particular, the loss of a large number of existing large trees will increase pluvial flood risk unless replaced with equal size or replacement SuDS/GI features again close to where they are lost. Nutley Lane where it meets Merrion Road and the Elm Park stream crossings are particular areas of concern.

The following more detailed comments shall be addressed:

While an increase in permeable areas in some sections is welcome, consideration should still be given to SuDS treatment of runoff whenever possible. It would be preferable to see nature based solutions throughout rather than oversized pipes, though we recognise that site constraints might prevent the NTA providing these in some cases.

It would be better to try to separate the network out in some areas and avoid multiple connections to combined sewers. It would be better to provide a separate surface water network where possible for future proofing the network and future separation, this would also improve capacity during a flood and reduce pressure on the CSOs. This has been proposed by NTA at CH A 4850 to 5153.

It should be noted that "Rolys Bistro" has constructed an unauthorised extension on the green area along Herbert Park which may impact on the route.

Surface and foul systems should be separated where possible, for example there is an opportunity to do this at CH A6142 to 6214 where proposed swales could connect to the proposed DN450 along Pembroke Road rather than the existing combined network.

Overall the design is based on no flooding for 1:30 years with 20% CC for existing networks when the proposal is to reuse existing network connections, which is acceptable. Note that increased permeable area is always welcome but it should not be assumed that this will offset increasing impermeable area into another network.

Water Framework Directive

The Water Framework Directive (2000/60/EC), (WFD) pertains to a number of identified waterbodies contiguous to the proposed Blackrock to Belfield CBC scheme.

An existing segregated surface water drainage network will service the proposed Blackrock/ Belfield to City Centre 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 Elm Park Stream, & River Dodder, are protected waterbodies under Article 4 of the Water Framework Directive. Currently both waterbodies are of 'moderate' status and the River Dodder is a 'priority' waterbody (one of the two Priority Rivers in Dublin City Council's administrative area).

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 Blackrock to Belfield 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. The developer should provide an evidence-based assessment of the impact, if any, of the proposed scheme on the water quality status pertinent to within the curtilage of the proposed project itself and not inclusive of other separate drainage areas which outfall to a same water body with an overall EPA classification. i.e. the Elm Park & Dodder rivers classification of 'moderate' status is inclusive of additional surface water impacts and the Blackrock/ Belfield to City Centre CBC scheme should be assessed alone to ensure the project is compliant.

Note:

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

Elm Park River:

The Elm Park River (A.k.a. Elm Park Stream) has been identified as an 'Area for Action' under the 3rd Cycle River Basin Management Plan 2022 -2027. Dublin City Council and Dun Laoghaire Rathdown County Council are listed as joint lead authorities with the Objective of Restoration of the river (Appendix 3, page 14). The list of measures to achieve this objective would be included within the list in Appendix 2 of the dRBMP.

This river is also a priority waterbody identified by the Bathing Waters Taskforce for actions aimed at addressing water quality at Merrion Beach. The BWTF is a joint initiative between DCC, DLRCC, FCC, IW & DHLGH.

Dodder River:

The Dodder River has been identified as an 'Area for Action' under the 3rd Cycle River Basin Management Plan. The section of the river within Dublin City Council's functional area, Dodder_050, has as assigned status of 'moderate' under the Water Framework Directive (WFD). It is the aim of Dublin City Council to improve the status of the river to at least 'good'.

Urban runoff has been identified as a significant pressure on the River Dodder and, therefore, measures are required to reduce the impact of urban runoff on receiving waters, including the River Dodder. Projects and developments occurring within the sub-catchment of the Dodder priority area for action should include measures to reduce the impact of urban runoff.

Two particular areas stand out for consideration:

1. Upgrade works at Merrion Gates: The existing 1,200 mm storm water sewer is the Nutley Stream which discharges to the Booterstown March nature reserve, a protected area in its own right.
2. Bridge crossing at Pembroke Road: The drainage infrastructure at this location is predominantly combined, including three combined sewer overflows and one syphon under the River Dodder at Beatty's Cottages. At least one of the CSOs is known to discharge to the River Dodder frequently.

At both of these locations, measures should be taken to minimise storm water runoff from the project area to the drainage network. The CSOs at Pembroke Road bridge are particularly sensitive to rainfall.

2.4.7.5 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.

2.4.8 City Archaeologist Comments

Archaeological & Cultural Heritage impacts associated with the Construction and Operation of the Belfield / Blackrock to City Centre Core Bus Corridor Scheme are assessed in Chapter 15 of the Environmental Impact Assessment Report (EIAR) Volume 2. The assessment is broken into sections/phases as follows:

- Stradbroke Road to Booterstown Avenue
- Booterstown Avenue to Nutley Lane
- Merrion Road (Nutley Lane to Ballsbridge)
- Ballsbridge to Merrion Square (Pembroke Road)
- Baggot Street and Fitzwilliam Street

Each section considers impacts on known monuments, non-designated archaeological sites, industrial and cultural heritage.

A detailed evaluation of the archaeological and cultural heritage resource took place, comprising a desk study of published and unpublished documentary and cartographic sources, supported by a field survey. During the medieval period, the study area formed part of the vast land holdings of the Fitzwilliam family and remained so into the 19th Century, when they passed to the Earls of Pembroke. The present road from Blackrock to Dublin follows an ancient routeway along the coastline, the Slí Cualann, one of the principal routes mentioned in early medieval documents.

The report concludes that during the Construction Phase, the potential archaeological and cultural heritage impacts associated with the development of the proposed scheme have been assessed. This included impacts on heritage assets, ground disturbance and degradation of the setting and amenity of heritage assets due to construction activities such as utility diversions, road resurfacing and road realignments. During the Operational Phase, the potential archaeological and cultural heritage impacts have been assessed.

The NTA will procure the services of a suitably-qualified archaeologist as part of its Employer's Representative team administering and monitoring the works. All archaeological and cultural heritage issues will be resolved by mitigation during the pre-Construction Phase or Construction Phase, in advance of the Operational Phase, through one or more of the following:

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

No Operational Phase impacts were identified for the proposed scheme.

The appointed contractor will make provision for archaeological monitoring to be carried out under licence to the DHLGH and the NMI, and will ensure the full recognition of, and the proper excavation and recording of, all archaeological soils, features, finds and deposits which may be disturbed below the ground surface. All archaeological issues will have to be resolved to the satisfaction of the DHLGH and the NMI. The appointed contractor will ensure that the archaeologist will have the authority to inspect all excavation to formation level for the proposed works and to temporarily halt the excavation work, if and as necessary, having conferred with the NTA. They will be given the authority to ensure

the temporary protection of any features of archaeological importance identified having conferred with the NTA. The archaeologist will be afforded sufficient time and resources to record and remove any such features identified in accordance with the licensing requirements agreed.

Archaeological excavation ensures that the removal of any archaeological soils, features, finds and deposits is systematically and accurately recorded, drawn and photographed, providing a paper and digital archive and adding to the archaeological knowledge of a specified area (i.e. preservation by record). As archaeological excavation involves the removal of the archaeological soils, features, finds and deposits, following this mitigation measure there is no further impact on the archaeological heritage.

In the case of cellars, coal cellars and / or basements, the appointed contractor in consultation with the archaeologist engaged by them will make provision for a geodetic survey and recording of each individual structure which will be subject to impact. This survey and recording will be carried out in advance of any construction works on the cellar, coal cellar and/or basement. The appointed contractor will make provision to allow for archaeological monitoring, inspection and excavation works that may arise on the site during the Construction Phase.

Features of a cultural heritage interest that are required to be removed on a temporary basis or for a short-term period, will be removed under archaeological supervision and in accordance with a method statement in consultation with the NTA and the relevant statutory authorities. This will protect the heritage asset from any adverse impacts and ensure that it is stored safely at an agreed location prior to its reinstatement.

Mitigation measures for upstanding industrial heritage sites, historic street furniture, and cultural heritage sites of architectural interest are provided in Chapter 16 (Architectural Heritage).

Recommendations

The Archaeology Section of Dublin City Council supports the proposed assessment and mitigation measures proposed in the EIAR and further recommends that:

1. The NTA appoint a project archaeologist to oversee the delivery of the archaeological strategy.
2. That the primary archaeological paper archive for any excavations be prepared and deposited with the Dublin City Archaeological Archives.

2.4.9 Conservation Section Comments

The Conservation Section acknowledges 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 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 out based on the information available on the Bus Connects website <https://belfieldblackrockscheme.ie/> and reviewed in the context of the provisions of the Dublin City Council Development Plan 2016 – 2022 including Chapter 11, and Appendices 7 and 8, 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 Conservation Section have considered the potential impact of the proposed development on the architectural heritage of this route and on the following categories in particular:

- Protected Structures and Proposed Protected Structures and their setting
- Buildings and other structures (post boxes/milestones etc.) included in the National Inventory of Architectural Heritage (NIAH)
- Structures included in the Dublin City Industrial Heritage Record Survey (DCIHR)
- Other unprotected structures that contribute positively to the architectural heritage and character of streetscapes
- Architectural Conservation Areas (ACAs)
- 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."*
- Lands zoned Z8 in the Dublin City Council Development Plan 2016-2022, which aims *"to protect the existing architectural and civic design character, and to allow only for limited expansion consistent with the conservation objective."*
- Historic Paving and Kerbing

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 including Appendices 7 and 8.

Impact of land acquisition / change to site boundaries

There are concerns regarding proposed changes to certain specific historic site boundaries and boundary treatment on foot of proposed land acquisition at the following locations;

- RP5090/5091 – Nos. 151 and 153 Merrion Road (Protected Structures) and adjoining houses at 155 and 157 Merrion Road, (Map Sheet 10) by land acquisition. The loss of over half of the front gardens and repositioning of historic boundaries will have a significant and negative impact on the Protected Structures, their curtilage and setting. Furthermore, the proposal to widen the existing vehicular entrance at No. 153 to 3.2m is contrary to the standards set out in Section 16.10.18 of the Dublin City Development Plan 2016-2022, which sets out standards regarding parking in the curtilage of protected structures.

The proposed land acquisition will significantly impact on the architectural composition of Estate Avenue. Built-in 1884 by the Earl of Pembroke, the houses were designed by H.E. Fitzgerald and are similar to other estate housing built by the Pembroke Estate. Nos. 151 and 153 are located to the south of the entrance to the Avenue, with a corresponding pair of houses to the north of the entrance. The removal of part of the gardens at the entrance to the development will seriously injure the composition as a whole and is a regrettable loss of streetscape character on Merrion Road.

- RPS 5086 (The Masonic School, now the Clayton Hotel on Merrion Road): Impact on curtilage of the protected structure due to the set back of the historic railings on Merrion Road from their historic location.
- RPS 5084 (former Pembroke Town Hall) will be impacted by the proposed insertion of a new vehicular entrance on Angelsea Road and the loss of one of the pedestrian gateways. The introduction of the new vehicular entrance will also result in the introduction of additional hard landscaping in front of the protected structure, a further adverse impact on its curtilage. It is recommended that a number of solutions are examined to ensure the impact on the protected structure is minimised.
- Provision of new vehicular entrance to 1 Pembroke Road from Wellington Road (Map Sheet 19). The impact on the historic railings and associated stone plinth wall in this location on Waterloo Road to facilitate the provision of a vehicular gateway, albeit using a section of the historic railings, is regrettable. It is recommended that a number of solutions are examined to ensure the impact on the protected structure is minimised.

Cantilever Signal Poles

There are concerns that the proposed location of cantilever signal poles at a number of locations in close proximity to protected structures will negatively impact the setting of protected structures and the character of the streetscape at the following locations;

- junction of the Merrion Road, Simmonscourt Road and Sandymount Avenue close to the protected structures at the Masonic School, now Clayton Hotel, Merrion Road (DCC RPS 5086)
- Merrion Road - at the Royal Dublin Society (RDS) and at the junction of Serpentine Avenue will be located close to the protected structures at the RDS (DCC RPS 5085).
- Ballsbridge close to the protected structures at Balls Bridge (RMP DU018059) and the Former Pembroke Town Hall (DCC RPS 5084),
- The Belgian Embassy at Shrewsbury House, 2 Shrewsbury Road (Map Sheet 14) located within a residential conservation area.

Location of Bus Shelters

There are concerns that the location of bus shelters at the following locations will detract from the setting of protected structures and the character of the historic streetscape. In the event of permission being granted for shelters at the following locations, it is recommended that outdoor advertising panels be omitted from the shelters.

- 1 Merrion View Avenue
- 45-50 Baggot Street Upper
- 67-68 Baggot Lower
- 63-67 Pembroke Road
- 86-88 Pembroke Road
- 4-5 Fitzwilliam Street Lower

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

It is recommended that prior to commencement of development that the applicant be required to agree in writing with the Planning Authority proposals for the protection of in situ /or removal, transport, storage and reassembly of the following items during the construction process ;

- historic lamp posts incorporating bases of former tram standards on Map Sheets 9 - 17.
- Swan neck street lights dating from 1920.
- Other historic lamp posts
- post boxes on Sheet 11, Sheet 12, Sheet 15, Sheet 18 and Sheet 20.
- concrete trough located at the former Allied Irish Bank offices on Merrion Road (Sheet 15)
- milestone on Pembroke Road (Map Sheet 18)
- sections of granite kerbing will require repositioning. It is not clear in the submitted information where they will be repositioned to. There are as following:
 - o The kerbs lining the footpath at the junction of Anglesea Road and Merrion Road;
 - o the kerbs lining the footpath located on the north side of Ball's Bridge (DU018059);
 - o the kerbs lining the footpath at Ballsbridge Terrace;
 - o the kerbs lining the footpath to the corner of Pembroke Road which continues on to Shelbourne Road;
 - o the kerbs lining the footpath in Herbert Park and at the junction of Herbert Park, Elgin Road and Pembroke Road (all located on Map Sheet 16).
- Jostle Stones on Pembroke Road (Map Sheet 18)
- Granite jostle stones at junction to Lad Lane/Baggot Street Lower (Map Sheet 20)
- Cobbles/setts surfaces - Fitzwilliam Street Lower (Map Sheets 20, 21).
- Coal hole covers on Baggot Street Lower (Map Sheet 20) and Fitzwilliam Street Lower (Map Sheets 20, 21).
- Coal hole cover Baggot Street Lower (Map Sheet 20) will be directly impacted and will be relocated as part of the works
- Cellar lights and cellar hatch Baggot Street Lower (Map Sheet 20).

Impacts on Architectural Heritage arising from Proposed Tree Removal and Provision of New Trees

The proposed removal of trees will have a significant impact on the architectural character and setting of historic structures, both protected and unprotected, and streetscapes. The proposed removal of trees will have a significant impact on the architectural character and setting of the following historic buildings:

- It is noted that it is proposed to remove a number of trees along Merrion Road straddling Map Sheets 8, 9, 10, 11 and 12. Of particular concern is the proposed loss of *Trees of High Quality* on Map Sheets 10, 11 and 12. This will impact on the two protected structures on Map Sheet 10 and on Residential Conservation Areas (lands zoned Z2) across these three sheets.
- It is noted that it is proposed to remove a number of trees along Pembroke Road (Map Sheet 17), Wellington Road (Map Sheet 18) and Baggot Street Upper (Map Sheet 19) that are considered to make a positive contribution to the setting of protected structures and Residential Conservation Areas (lands zoned Z2).
- While the benefits of the introduction of trees within the city is generally supported in principle, it is considered that the introduction of a new line of trees on Fitzwilliam Street Lower (Map Sheets 20 and 21) will adversely impact on the architectural character of this significant Georgian

streetscape. The proposed trees will detract from the uncluttered and 'clean' streetscape as defined by the generally consistent building lines and parapets which gives a wonderfully clear view towards the mountains and which is part of the special somewhat austere and pure architectural character of this street.

It is noted that historic Georgian Streetscapes did not normally feature street trees on the footpaths. Furthermore the introduction of trees may impact on coal bunkers beneath the footpath; coal hole covers survive at the south-eastern end of the street.

- There will be significant tree removal along Nutley Lane (Map Sheet 22) which will impact on the architectural setting of buildings on this road.

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).

General Observations

- McCartney Bridge RPS 872 (DCIHR 18_16_004), may be impacted by the upgrading of the existing access ramp to the northwest corner of the bridge/Grand Canal tow path. It is recommended that this impact be mitigated by the recording, protection and monitoring of the works during the construction phase.
- RPS Structures Ref. 1978, 26 Clyde Road, Ref. 1979, 27 Clyde Road and Ref. 1980, 28 Clyde Road (Map Sheet 24) have the potential to be negatively impacted by the provision of new signage in close proximity to them. It is noted that the three signs proposed, including two at the entrance to Clyde Lane, are signalling the same rule. It is recommended that this be revisited and the signage numbers reduced.

Other unprotected structures that contribute positively to the architectural heritage and streetscape character

- The proposed relocation of the former entrance gates to Bloomfield (Map Sheet 11), an early nineteenth-century house and demesne, will have a significant negative impact on the structure. It is the sole surviving remnant of this former demesne and is an important contributor to the historic character of Merrion Road. The proposed new location has no relevance to the structure, being on lands outside the historic demesne. This will have the effect of blurring the historical record and is contrary to best conservation practice.

2.4.10 City Architects Division Comments

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

The scheme notes that proposals for public realm upgrades, including widened footpaths, high quality hard and soft landscaping to contribute towards a safer, more attractive environment for pedestrians are included, and that it 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:

- The design of the public realm will be fundamental to the success of the proposed scheme. This design needs to be supported by pedestrian traffic counts to ensure that footpaths are of sufficient width to safely accommodate anticipated pedestrian volumes and to provide for ancillary public realm infrastructure such as tree-planting, greening and street furniture, as well as traffic infrastructure such as bus shelters, utility cabinets, and cycle stands etc. Footpaths should be designed to be universally accessible and pedestrian environments enhanced.

- **Local Public Realm Improvement Schemes:**

The proposed scheme includes images of proposed public realm improvements outside

1. Ballsbridge Village: Herbert Park Rd and Shelbourne Rd (Sheet 16).
2. Northumberland Rd and Pembroke Rd (Sheet 17).

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

Bus Shelter Design:

Bus shelter locations are indicated on the drawings but information on their proposed design, size and type is not provided. The proposed location of bus shelters in the vicinity of buildings of architectural importance and in Red-lined Conservation Areas needs to be considered carefully. Bus shelters are proposed in the scheme along Baggot St Lower and Fitzwilliam St Lower where currently none exist. However no bus shelters in these locations is preferable as the streets are located within a Red-lined Conservation Area and the footpaths are narrow. Bus stops only rather than bus shelters would be

preferable. The vistas and settings of Protected Structures will also be impacted by the proposed siting of bus shelters in their vicinity.

In the interest of visual amenity and having regard to protected structures and their settings, advertisements should not be permitted on bus shelters in Architectural Conservation Areas (ACA), Red-Lined Conservation Areas or Special Planning Control Schemes (SPCS).

Siting of utility cabinets and above-ground utility infrastructure:

The siting of utility cabinets, poles and other above-ground utility infrastructure may have significant impacts on the space, visual impact and quality of the public realm.

Palette of Materials

It is noted that the 'Typical Material Typologies' in Section 4.6.12.2.1, of Volume 2, Chapter 4 Proposed Scheme Description, and Volume 3, Figures, Chapter 4.5 Landscaping General Arrangement drawings, do not appear to include or refer to existing historic fabric such as historic granite paving and historic granite kerbs within the Proposed Scheme.

Palette of street furniture:

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

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

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

Boundary treatments:

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

Street Trees & Planting:

New street trees are proposed in the scheme in the footpaths along Baggot Street Lower and Fitzwilliam Street, both of which are within a Red-lined Conservation Area (Sheet 20). It is considered that historic Georgian Streetscapes do not normally feature street trees in the footpaths and hence are considered inappropriate at this location and should be omitted. Furthermore their siting would reduce the usable width of the footpaths and may impact on historic cellars.

Integration of the materials palette of the proposed scheme with existing private landing areas and recently upgraded areas of the public footpath:

The project red line of the proposed scheme appears to exclude private landing areas adjacent to the footpath which may be surfaced in materials different to the palette under the scheme. In addition there are areas of recently upgraded public footpath with high quality materials e.g. in front of the ESB Building, Fitzwilliam Street & Baggot St Lower, which differ from the palette of the proposed scheme. A strategy for the resurfacing of private landings (with the owner's consent), and the retention / replacement of newly resurfaced areas of public footpath should be devised so a consistent paving palette is used throughout the scheme. In the example in front of the ESB building, where a high quality granite footpath was recently laid, it should not be the intention of the proposed scheme to replace this.

Village Signage:

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

2.4.11 Parks, Biodiversity and Landscape Division Comments

The Parks, Biodiversity and Landscape Division has provided the following comments on the Proposed Scheme:

1. Park Services have reservations on the scheme due to the loss of trees along the proposed route, in particular prominent mature trees that have a significant value to amenity of their local areas. It is considered that the proposals should be revised to conserve trees to a greater extent.
2. Agreement on taking in charge of landscape components of the proposals by DCC Park Services will require liaison and agreement on planting details prior to implementation. Amendments to planting proposals may be required to comply with Park Services contract maintenance requirements.
3. All landscape components of the proposals will require contract maintenance for a minimum of 3 years following completion of the works or any phases. Landscape areas agreed to be taken in charge will require full completion of the 3 year maintenance period and rectification of any defects or loss of planting.
4. Tree planting proposals are welcome within the proposals however the constraints of overhead and underground services on this planting and other constraints, such as planting close to existing boundaries should be realistically assessed.
5. 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.
6. The implementation of the arboricultural and landscape proposals will require the professional input of Arboriculturists and Landscape Architects for the full duration of project.
7. Tree protection measures for all existing trees shall be put in place prior to the commencement of development or phases of development. Where existing trees require remedial measures to alleviate risk to the users of the completed development, then these shall be completed by the project proponent. The project proponent shall be required to fund

tree remedial works or tree replacement works where existing trees retained decline or fail within 5 years of the completion of the project or project phases.

2.4.12 City Arts Officer Comments

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

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

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

For further information:

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

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

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

2.5 Conclusion

The Blackrock/Belfield 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 2016-2020 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 form 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 permission be conditioned 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 reports attached in the appendix.

APPENDIX: Recommended 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 undertake electrical or system control work on either the existing or new traffic signals.

Roads Division

Handover:

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

Existing Condition Record:

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

Design:

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

Reinstatement:

15. All reinstatement work and areas to be taken in charge shall be carried out in accordance with "Construction Standards for Road and Street Works in Dublin City Council" unless otherwise agreed with DCC.
16. The extent and type of the reinstatement required shall be agreed with DCC prior to commencement of any work on site. This shall be shown on drawings and signed off on by both parties.
17. All works to public roads in DCC's Functional Area shall comply with the "Council's Construction Standards for Road and Street Works in Dublin City."
18. Samples of all new natural stone kerbs, flags and setts to be used in construction works shall be supplied to DCC for agreement prior to use.

Construction Period:

19. All roadworks shall be carried out in accordance with the current edition of Dublin City Council's *Directive for the Control and Management of Roadworks in Dublin City* unless otherwise agreed with DCC.
20. In cases of reinstatement of areas where the roadway or footway is not being reconstructed in full (e.g. trench for utility alongside street) the NTA or their Contractor shall pay DCC long term damages charges as set out in the current edition of Dublin City Council's *Directive for the Control and Management of Roadworks in Dublin City*.
21. All antique setts if removed as part of the works shall be cleaned, stored on pallets by the contractor and reinstated in the carriageway to DCC's specification if required by DCC unless otherwise agreed with Dublin City Council.

22. All existing and antique natural stone kerbs and flags, if removed without damage as part of the works, shall be cleaned, stored on pallets by the contractor and reinstated in the footway to DCC's specification.
23. During construction and prior to opening of the Scheme, the National Transport Authority shall undertake an awareness, education and behavioural change programme to educate road users as how to use the Scheme with particular regard to interaction between pedestrians and cyclists.

Miscellaneous

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

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.

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

Temporary Lighting

3. 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.

Environmental Protection Division

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

1. This development must comply with the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0 (available from www.dublincity.ie Forms and Downloads). In particular:
 - i. Continuous Kerbs Incorporating drainage, as outlined in Figure 2, Page 3 In Appendix K Drainage Design Basis Document, are not accepted by DCC Drainage Planning, Policy and Development Control.
 - ii. Enclosed drainage channels such as slot drains or "ACO" drains are not accepted by Drainage Planning, Policy and Development Control.
 - iii. The hybrid gully outlined in Section 1.1.3, Page 4 in the BusConnects - Road run-off collection gullies Technical Paper is not accepted by DCC Drainage Planning, Policy and Development Control. The use of narrow profile gullies as previously agreed is welcome.

2. The development shall incorporate Sustainable Drainage Systems in the management of surface water, providing an integrated approach with the landscaping proposals. Full details of these shall be agreed in writing with DCC Drainage Planning, Policy and Development Control prior to commencement of construction. Soft landscaping should be considered before hard landscaping. The SuDS design should refer to the new Dublin City Council Sustainable Drainage Design and Evaluation Guide published in 2021.
3. The detailed drainage design shall be agreed in writing with DCC Drainage Planning, Policy and Development Control prior to commencement of construction. Surveys on the location and condition of surface water infrastructure sewers, both pre and post development, shall be carried out by the developer and any damage rectified. Any diversions shall be agreed in writing, prior to commencement, with Drainage Planning, Policy and Development Control. Details on proposed connection locations to the surface water network and flow discharges shall also be agreed.
4. To support our achievement of our legislative obligations the Blackrock/ Belfield to City Centre 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 DCC and national obligations. The NTA shall provide an evidence-based assessment of the impact, if any, of the proposed scheme on the water quality status of both rivers within the curtilage of the proposed project (Dodder and Elm Park), including both ecological and chemical status.
5. The NTA shall confirm in writing to Drainage Planning, Policy and Development Control that the development has been designed such that the risk of flooding to the development has been reduced as far as is reasonably practicable, and that the proposals do not increase the risk of flooding to any adjacent or nearby area. This includes assessment of pluvial flood risk at all locations along the route (not just where sections are 150m long). The effect of climate change on flooding, +20% rainfall and 0.5m sea level rise should be allowed for in calculations. Any changes in ground profile shall be modelled to demonstrate no increase in flood risk and to reduce it where reasonably possible.
6. The developer must demonstrate that this development passes the three stages of the SFRA Justification Test, particularly for tidal and fluvial flooding.
7. New compensatory SuDS measures should be provided close to any green areas lost. In particular, the loss of a large number of existing large trees will increase pluvial flood risk unless replaced with equal size or replacement SuDS/GI features close to where they are lost. Nutley Lane where it meets Merrion Road and the Elm Park stream crossings are particular areas of concern.
8. As-built drawings of all drainage networks and SuDS measures shall be provided by the NTA on completion of the works.

Air and Noise Pollution Control Unit

1. 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>

Planning Department

1. No advertising or digital displays shall be installed in the proposed bus shelters without a prior grant of permission.

2. The proposed bus shelters and new street trees on Fitzwilliam Street Lower and Baggot Street Lower shall be omitted.

Reason: In the interest of visual amenity.

City Archaeologist

1. The NTA appoint a project archaeologist to oversee the delivery of the archaeological strategy
2. That the primary archaeological paper archive for any excavations be prepared and deposited with the Dublin City Archaeological Archives.

Conservation Section

1. To safeguard the special architectural interest of the city's Architectural Heritage along the Blackrock/Belfield Bus Connects route and ensure that the proposed works including repair works are carried out in accordance with best conservation practice, it is recommended that all works be designed and supervised by an expert in architectural conservation in accordance with the provisions 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.

All existing original architectural heritage features, in the vicinity of the works shall be protected during the course of all phases of construction works. 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.

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 by the conservation professional to the Planning Authority for its approval.
4. The conservation professional shall advise the Planning Authority 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 Planning Authority 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. The Conservation Section recommends the following specific measures:
 - a. Where land acquisition is unavoidable, historic boundary features are to be reinstated in their new locations on a 'like-for-like' basis, by skilled practitioners under the supervision of the conservation professional appointed for the project.

- b. All bus shelters/stops and associated infrastructure shall be designed / located to cause minimum interference to the heritage structure, its character, setting and fabric.
- c. The proposal to widen the existing vehicular entrance at Nos. 153, 155 and 157 Merrion Road to 3.2m is contrary to the standards set out in Section 16.10.18 of the Dublin City Development Plan 2016-2022, regarding parking in the curtilage of protected structures and conservation areas. This are to be revised to align with Section 16.10.18.
- d. The proposed relocation of the former entrance gates to Bloomfield on Merrion Road should be reconsidered to ensure the integrity of the historic structure is retained.
- e. It is recommended that a number of solutions are examined for the provision of the new vehicular entrance to the Anglesea Road boundary of the former Pembroke Town Hall (RPS 5084), perhaps also retaining the pedestrian gate. The design of the new vehicular entrance is to be submitted for review by the Planning Authority and agreed in writing prior to commencement of development.
- f. The introduction of the proposed new line of trees on Fitzwilliam Street Lower will give rise to a loss of the special character of the Georgian streetscape. The location of trees in Conservation Areas is to be submitted for review by the Planning Authority and agreed in writing prior to commencement of development.

City Architects Division

- 1. Detailed drawings and specifications of the proposed public realm improvement scheme at Ballsbridge Village and Northumberland Rd & Pembroke Rd shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.
- 2. Full details of the design and type of each bus shelter for each location shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.
- 3. 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.
- 4. A full palette of street furniture and their proposed locations across all the proposed BusConnects Core Bus Corridor Schemes, shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.
- 5. Fabric in all property boundaries which are to be relocated to facilitate land acquisition along the Proposed Scheme should be assessed for their architectural conservation value and cultural value. This assessment should be submitted to, and agreed in writing with, the planning authority prior to commencement of development.
- 6. A strategy for the resurfacing of private landings and the retention / replacement of newly resurfaced areas of public footpath should be devised so a consistent paving palette is used in the Proposed Scheme. This information shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.
- 7. Village signage should be incorporated into the Proposed Scheme, and a scheme of city wide co-ordinated village signage should be undertaken and shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Parks, Biodiversity and Landscape Services

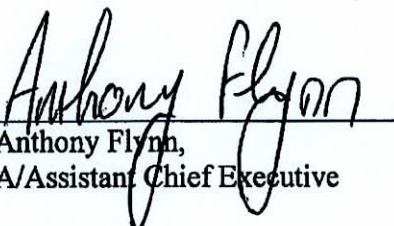
- 1. Park Services have reservations on the scheme due to the loss of trees along the proposed route, in particular prominent mature trees that have a significant value to amenity of their local areas. It is considered that the proposals should be revised to conserve trees to a greater extent.
- 2. Agreement on taking in charge of landscape components of the proposals by DCC Park Services will require liaison and agreement on planting details prior to implementation. Amendments to planting proposals may be required to comply with Park Services contract maintenance requirements.

3. All landscape components of the proposals will require contract maintenance for a minimum of 3 years following completion of the works or any phases. Landscape areas agreed to be taken in charge will require full completion of the 3 year maintenance period and rectification of any defects or loss of planting.
4. Tree planting proposals are welcome within the proposals however the constraints of overhead and underground services on this planting and other constraints, such as planting close to existing boundaries should be realistically assessed.
5. 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.
6. The implementation of the arboricultural and landscape proposals will require the professional input of Arboriculturists and Landscape Architects for the full duration of project.
7. Tree protection measures for all existing trees shall be put in place prior to the commencement of development or phases of development. Where existing trees require remedial measures to alleviate risk to the users of the completed development, then these shall be completed by the project proponent. The project proponent shall be required to fund tree remedial works or tree replacement works where existing trees retained decline or fail within 5 years of the completion of the project or project phases.

City Arts Officer

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

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


Anthony Flynn,
A/Assistant Chief Executive