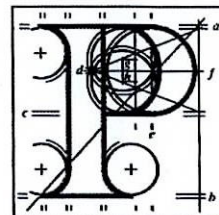


**Our Case Number: ABP-314056-22**



**An  
Bord  
Pleanála**

South Dublin County Council  
Planning Department  
County Hall  
Tallaght  
Dublin 24

**Date:** 27 September 2022

**Re:** Liffey Valley to City Centre Core Bus Corridor Scheme.  
Fonthill Road to High Street all in the County of Dublin.

Dear Sir / Madam,


Please disregard the letter sent on 26<sup>th</sup> September 2022 and please see below.

An Bord Pleanála has received your observation or submission in relation to the case mentioned above and will take it into consideration in its determination of the matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the Local Authority and at the offices of An Bord Pleanála when they have been processed by the Board.

For further information on this case please access our website at [www.pleanala.ie](http://www.pleanala.ie) and input the 6-digit case number into the search box. This number is shown on the top of this letter (for example: 314056).

Yours faithfully,



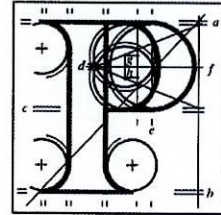
Niamh Thornton  
Executive Officer  
Direct Line: 01-8737247

BL50A

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

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

**Our Case Number:** ABP-314056-22



**An  
Bord  
Pleanála**

South Dublin County Council  
Planning Department  
County Hall  
Tallaght  
Dublin 24

**Date:** 26 September 2022

**Re:** Liffey Valley to City Centre Core Bus Corridor Scheme.  
Fonthill Road to High Street all in the County of Dublin.

Dear Sir / Madam,

An Bord Pleanála has received your observation or submission in relation to the case mentioned above and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the Local Authority and at the offices of An Bord Pleanála when they have been processed by the Board.

For further information on this case please access our website at [www.pleanala.ie](http://www.pleanala.ie) and input the 6-digit case number into the search box. This number is shown on the top of this letter (for example: 303000).

Yours faithfully,

*pp. K. McGilgan*

Niamh Thornton  
Executive Officer  
Direct Line: 01-8737247

BL50A

<b>Tel</b>	<b>Tel</b>	(01) 858 8100
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64 Sráid Maoilbhríde	64 Marlborough Street
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**SOUTH DUBLIN COUNTY  
COUNCIL SUBMISSION  
“LIFFEY VALLEY TO CITY  
CENTRE”  
Core Bus Corridor Scheme**

Land Use Transportation and Planning Department

September 2022

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<b>Section 1: Active Travel Section Comments:</b>	<b>Page 3</b>
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## **Introduction:**

The NTA have submitted a planning application to An Bord Pleanála for the **Liffey Valley to City Centre Core Bus Corridor Scheme**.

**The documents submitted with this application include:**

**Proposed Design Drawings and supporting and statutory documentation including an:**

- 1. Environmental Impact Assessment:**
- 2. A Natura Impact Statement:**

In this report, SDCC will be making a formal submission to An Bord Pleanála as part of this consultation process.

The Proposed Scheme has an overall length of approximately 9.2km. It will commence at the Fonthill Road where it will tie into the new bus interchange facility on the northern boundary of the Liffey Valley Shopping Centre. The Proposed Scheme will continue along the Fonthill road to the south of Liffey Valley Shopping Centre in a southerly direction towards Coldcut Road. From here it will travel along the Ballyfermott road, Sarsfield Road and on to the City Centre.

The Proposed Scheme is described in the following geographical sections:

- Section 1: Liffey Valley to Le Fanu Road;
- Section 2: Le Fanu Road to Sarsfield Road; and
- Section 3: Sarsfield Road to City Centre.

The first section, Liffey Valley to Le Fanu Road is located mostly within the SDCC Local Authority area and therefore our comments and observations are focussed on this particular part of the proposed scheme.

SDCC has invited several of the relevant sections to review the planning application drawings and supporting documents. Five SDCC sections/departments have made comments on the proposed scheme including from the Active Travel Team, the Planning Section, the Road Maintenance Section, the Traffic and Transportation section and the Economic Development section of South Dublin County Council. All of these comments are included in this report.

Also including is a copy of the marked up General Arrangement Drawings which includes notes from our Active Travel Team.

## **Summary of SDCC Views on the Proposal:**

SDCC are broadly happy with the planning proposal and are of the view that the proposal aligns with the policies of the County Development Plan (2022 – 2028). The comments provided in this report are mainly focussed on the construction management controls and minor design details of the scheme. The vast majority of our concerns have been addressed through the extensive consultation process that has been conducted to date by the NTA with the various stakeholders in our Local Authority area.

The remaining aspects raised by our planning, traffic, active travel and maintenance teams are:

- (a) Minor junction details to be examined raised by our Active Travel Team in section 1.
- (b) Minor Planning details to be examined raised by our Planning Team in section 2.
- (c) Requests that certain material selections are restricted where possible requested by our Maintenance Team contained in section 3.
- (d) The required Construction Management and Traffic Management plans required for the continued safe and efficient operation of the roads network in the vicinity of the development contained in section 4.
- (e) SDCC would like an assurance that the delivery of this scheme will not negatively impact on timing of the delivery of the Lucan Luas extension.
- (f) Further discussion between NTA and SDCC on the exact parcels of land identified within the scheme is required to assist with the scheme

SDCC is supportive of the delivery of this project. This Bus Connects project represents a big step forward in the delivery of sustainable transport alternatives in the South Dublin Local Authority Area.

## **Section 1: Active Travel Section Comments:**

The Active Travel Team have annotated the General Arrangement Drawings with a number of design detail comments.

I attach the annotated drawings with this submission. Float cursor over the yellow boxes for each note to appear. I list out these comments below for your information.

### **General Arrangement Drawing 0003:**

**Annotation reads...**

“By having the pedestrian crossing and the cycle track on both sides the pedestrian crossing is 4m longer than necessary.

A Cyclops junction would reduce pedestrian crossing distance.

A Cyclops junction would allow for the turning cyclist to continue without traffic signals.

Left turning vehicles and straight-ahead cyclists will be in conflict.”



## **General Arrangement Drawing 0004:**

### **Annotation 1 reads...**

"Footpath and cycle track could be installed inside the green strip to provide horizontal segregation."

### **Annotation 2 reads..**

" Where cycle track narrows it should be away from the bus lane and not towards it. This would remove unnecessary deviations in footpath also"

### **Annotation 3 reads..**

"No means of cyclist wishing to continue on Fonthill road to join general traffic lane."

### **Annotation 4 reads..**

"Left turn onto the two-way cycle track is greater than 90 degrees. Suggest two way and footpath adjusted to improve this angle."

## **General Arrangement Drawing 0005:**

### **Annotation 1 reads...**

"Horizontal separation could be provided for here."

### **Annotation 2 reads...**

"There would be space for between the existing and new trees to provide horizontal separation for peds and cyclists."

### **Annotation 3 reads...**

"Crossing should not be staggered."

### **Annotation 4 reads...**

"There should not be a deviation in the cycle track as it crosses the junction."

### **Annotation 5 reads...**

"Why is this staggered junction?"

### **Annotation 6 reads...**

"Footpath and cycle track should be set back from the road edge."

### **Annotation 7 reads...**

"Cycle track should deviate away from the road and not towards it."

### **Annotation 8 reads...**

"Materials used should show peds /cyclists have entered a shared space."

### **General Arrangement Drawing 0006:**

#### **Annotation 1 reads...**

"Cycle track should not deviate towards bus lane (both sides)."

#### **Annotation 2 reads...**

"Straight through cyclists will be stopped on road signals."

#### **Annotation 3 reads...**

"Is this side of junction (4 lanes) a two-stage crossing for peds but the other side (5 lanes) is a single stage?"

### **General Arrangement Drawing 0007:**

#### **Annotation 1 reads...**

"Cycle track could be routed away from the road edge."

#### **Annotation 2 reads...**

"Will Toucan be raised crossing similar to Chainage B 1500m and B 1850m?"

### **General Arrangement Drawing 0008:**

#### **Annotation 1 reads...**

"Same Note as previous junctions"

#### **Annotation 2 reads...**

"Corner Radii at minor junctions look larger than desirable."



## Section 2: Planning Department Comments:

### BusConnects Dublin – Liffey Valley – City Centre

The South Dublin County Development Plan 2022-2028 is generally in favour of the principle of the proposed scheme, with a supportive policy context as outlined below in Section 1. Comments which relate specifically to detailed design are outlined in section 2.

#### 1. South Dublin County Development Plan 2022-2028 Policy Context:

##### **Policy SM1:**

*Promote ease of movement within, and access to South Dublin County, by integrating sustainable land-use planning with a high-quality sustainable transport and movement network for people and goods.*

##### **SM1 Objective 1:**

*To achieve and monitor a transition to more sustainable travel modes including walking, cycling and public transport over the lifetime of the County Development Plan, in line with the County mode share targets of 15% Walk; 10% Cycle; 20% Bus; 5% Rail; and 50% Private (Car / Van / HGV / Motorcycle).*

##### **Policy SM3: Public Transport – General**

*Promote a significant shift from car-based travel to public transport in line with County targets and facilitate the sustainable development of the County by supporting and guiding national agencies in delivering major improvements to the public transport network.*

##### **SM3 Objective 1:**

*To achieve and monitor a transition to the County mode share targets of 20% Bus and 5% Rail.*

- *A network of continuous bus priority and safe cycling facilities along 16 corridors;*
- *A redesigned more efficient bus network with high frequency spines, new orbital routes and increased bus services;*
- *More user-friendly and convenient ticketing and payment systems;*
- *Improved bus waiting facilities; and*
- *A transition to a low emissions bus fleet.*

*It is anticipated that a planning application for the radial core bus corridor infrastructure will be submitted by the NTA to An Bord Pleanála with construction expected to take place within the lifetime of the plan.*

##### **Policy SM3: Public Transport – Bus**

**SM3 Objective 11:**

*To facilitate the delivery of the BusConnects Core Bus Corridors and seek additional bus corridor and orbital routes to serve the County by securing and maintaining any required route reservations and to ensure the BusConnects Corridors do not adversely affect the village life and livelihoods of any of our County Villages.*

**SM3 Objective 12:**

*To work with the NTA to secure the expansion of the bus network, including distinct new bus networks as necessary, to serve new development and regeneration areas within the South Dublin County area including Tallaght, City Edge, Adamstown, Clonburris, Fortunestown, Ballycullen and Newcastle.*

**SM3 Objective 17:**

*To work with the NTA and other state agencies to facilitate the delivery of the Kennelsfort Road-R148 grade separated junction or an equivalent solution to maximise the efficacy of the BusConnects Project.*

**SM3 Objective 18:**

*To liaise with bus service providers where new bus stop infrastructure is proposed in order to ensure facilities such as shelters and bins are included, where appropriate.*

## 2. Comments Specific to the Proposed Scheme:

**Strategic:**

- Key consideration is Liffey Valley Shopping Centre and ensuing proposed scheme, and detailed design is cognisant of permitted development as outlined below (reference to sheet 3 in NTA documentation)
- Proposed scheme considered to have cumulative positive impact on surrounding area with junction upgrades proposed on R113, to the west, on foot of NTA funding allocation.
- Sheet 13 Kylemore Road – proposed scheme to consider and link with future transport hub located to the south, on Kildare Rail line, proposed as part of the City Edge Framework Plan.

**Detailed:**

The below comments to be read in conjunction with 'Appendix A, Preferred Route Drawing' as found on [www.liffeyvalleyscheme.ie](http://www.liffeyvalleyscheme.ie)

**General Arrangement Drawing ..0003:**

The reference to SD19A/0320 (ABP-306251-19) is welcomed. It should be noted that amendments were permitted under SD21A/0291 and also amended by condition / compliance for SD21A/0291.



*“Amendments to the permitted development previously granted under SDCC Ref. SD19A/0320 and An Bord Pleanála Ref. 306251-19; including the erection of 2 bus shelters on Fonthill Road each comprising of a bus stop sign, real time passenger information (RTPI) unit and a two-sided internally illuminated advertising panel (c. 1.9sq.m each side); road alterations on Fonthill Road comprising of the amendment of staggered to straight Toucan crossings, the addition of a new straight Toucan crossing, the replacement of bus lay-by areas with bus islands, and the removal of a left slip lane; all associated site services and site development works”.*

Clarification should be provided whether existing planting on central reserve and side of road will be retained / enhanced. An increase in soft landscaping would be beneficial here. The proposal appears to be dominated by hard landscape. Green Infrastructure considerations are required. (Comments made at previous bus connects consultation)

**General Arrangement Drawing ..0004:**

Possible relocation of pedestrian crossing at Tesco. The pedestrian links to Tesco and retail area to south (Curry’s etc) may be broken. Cycle lane appears to only continue east on Fonthill Road on the southern carriageway.

**General Arrangement Drawing ..0005:**

Further section and elevation details required with respect to proposed retaining wall.

**General Arrangement Drawing ..0006:**

Potential for cycle track to connect to the existing residential estates entrances to the south should be examined. Small extensions would connect these estates to the proposed cycle network.

**General Arrangement Drawing ..0007:**

Ensure location of bus stops does not negatively impact potential access to Cherry Orchard Industrial Estate Regeneration Area. There is a proposal that a major vehicle access would be located north of the proposed bus stop. If this bus stop was moved 10m east of west this would provide the opportunity to deliver this access.

Good connections required from Kennelsfort Road Upper – proposed crossings and cycle link welcomed. The cycle upgrades should extend further up Kennelsfort Road Upper (if possible, to connect with Chapelizod Bypass. Again, these connections would greatly enhance cycle permeability at this location.

**General Arrangement Drawing ..0008:**

Cycle lane / connections should continue to the north, into the existing industrial estate. This mirrors the comment on drawing 0007 calling for a more connected cycle network at this location.



### **Section 3: Roads Maintenance Section Comments:**

#### **1. The Use of Integrated Drainage Kerbs:**

"I would however like to request that no kerb integrated drainage is included in the scheme."

This is because they are difficult to jet to keep clean and they are prone to cracking and are difficult to replace at isolated sections. This should be secured by planning condition.

#### **2. The Use of Coloured Bound Surfaces for Cycle Tracks and Shared Surfaces:**

Coloured bound surfacing is increasingly hard to procure in small quantities for maintenance repairs. Therefore, we respectfully ask that these products are not used or used sparingly throughout the design. This should be secured by planning condition.

## **Section 4: Traffic and Transportation Comments:**

The Traffic and Transport Section of SDCC are very supportive of this planning application. The proposals support the GDA Transport Strategy and many of the sustainable movement policies in our new County Development Plan. These proposals also support policies and help us move towards our targets set out in our Climate Action Plans.

### **Construction Management Plans:**

The proposed Bus corridor route runs along one of SDCC's very busy road networks. The location is in close proximity to the (N4) National Road and (M50) motorway. In addition, there is the Liffey Valley Shopping centre. Currently, there are related construction works are being carried out at the Liffey Valley Shopping centre. It is important that the timing of this work does not clash with any other planned construction works.

The TII will be anxious that any construction plans ensure the continued safe and efficient operation of the N4 and M50 road network. SDCC also want to ensure that the surrounding road network is kept as free flowing as is practicable during the construction works.

Therefore, it is important that for each phase of the development in our Local Authority area, detailed Construction traffic management plans are agreed prior to commencement of that phase of work.

**The Construction Traffic shall be managed in accordance and contain the elements listed below:**

**Construction traffic arising from the site shall be managed in accordance with a method statement for the management of the construction phase in accordance with an agreed site-specific Construction Traffic Management Plan that fully accords with requirements of the Council's Traffic Section.**

**In this regard within a maximum of two weeks from the date of any Commencement Notice within the meaning of Part II of the Building Control Regulations 1997 and prior to the commencement of works on site the applicant, owner or developer shall lodge with the Planning Authority:**

- (i) A site-specific Construction Traffic Management Plan that accords with the Council's Traffic Section requirements, and;**
- (ii) The written confirmation of the Council's Traffic Section of their agreement to the Construction Traffic Management Plan, and;**
- (iii) A written commitment from the developer to carry out the development in accordance with this Construction Traffic Management Plan, and;**
- (iv) These requirements have been acknowledged in writing as acceptable by the Planning Authority.**

**The required Construction Traffic Management Plan shall include:-**

- (i) Details of the agreed number, location and use of suitable facilities for vehicle cleansing and wheel washing provided on site prior to commencing of construction and a written commitment that such facilities will be maintained in a satisfactorily operational condition during all periods of construction, and;**



- (ii) Location of all on-site car parking facilities provided for site workers during the course of all construction activity, and;**
- (iii) Provision for dust suppression measures in periods of extended dry weather, and;**
- (iv) Provision for the flexible use of a road sweeper if an acute situation on the adjoining public road requires it, and;**
- (v) Location of materials compound and site huts, and;**
- (vi) Details of security fencing, and;**
- (vii) Name and contact details for site manager, and;**
- (viii) Methodology for the use and control of spoil on site during construction, and;**
- (ix) Details of access arrangements/routes to be used by construction traffic, to include details of arrangements to manage potential conflicts with site specific issues i.e. schools, playing pitches etc.**
- (x) Measures to obviate queuing of construction traffic on the adjoining road network. In this regard the applicant owner or developer shall consult with the Council's Traffic Section before any works are carried out, and;**
- (xi) Details of measures to protect watercourses on or adjoining the site from the spillage of deposit of clay, rubble or other debris,**
- (xii) Alternative arrangements to be put in place for pedestrians and vehicles in the case of the closure of any public road or public footpath during the course of site development works;**

**The plan should also be informed by any Project Construction Waste and Demolition Management Plan required to be prepared and agreed that addresses intended construction waste management and any traffic issues that may arise from such a plan.**

**A record of daily checks that the works are being undertaken in accordance with the site-specific Construction Traffic Management Plan shall be kept for inspection by the Planning Authority.**

**Storage of construction materials is not permitted on any public road or footpath, unless agreed in writing with the Planning Authority, having regard to the prior reasonable justification and circumstances of any such storage.**

#### **Timing of the Delivery of Lucan Luas:**

SDCC are concerned to ensure that this development does not impinge on the delivery of the proposed Lucan Luas extension. It is our understanding that the delivery of this Bus connects corridor will be supported by the delivery of the Lucan Luas extension. SDCC hope that the delivery of this Bus Scheme will not delay the delivery of the proposed Luas project.



## **Section 5: Economic Development:**

The Economic Development section has received the NTA's proposed CPO land pack. This section is in favour of the project and will assist the developer with any relevant land agreements and access permissions in relation to this scheme, however, furthermore detailed discussion on the plots of land identified for inclusion in the scheme is required to assist with this.

## **Summary of SDCC Views on the Proposal:**

SDCC are broadly happy with the planning proposal and are of the view that the proposal aligns with the policies of the County Development Plan (2022 – 2028). The comments provided in this report are mainly focussed on the construction management controls and minor design details of the scheme. The vast majority of our concerns have been addressed through the extensive consultation process that has been conducted to date by the NTA with the various stakeholders in our Local Authority area.

The remaining aspects raised by our planning, traffic, active travel and maintenance teams are:

- (g) Minor junction details to be examined raised by our Active Travel Team in section 1.
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- (k) SDCC would like an assurance that the delivery of this scheme will not negatively impact on timing of the delivery of the Lucan Luas extension.
- (l) Further discussion between NTA and SDCC on the exact parcels of land identified within the scheme is required to assist with the scheme

SDCC is supportive of the delivery of this project. This Bus Connects project represents a big step forward in the delivery of sustainable transport alternatives in the South Dublin Local Authority Area.