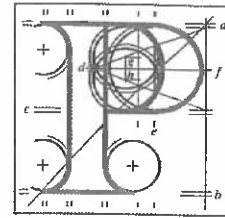


Our Case Number: ABP-314610-22



An  
Bord  
Pleanála

Chief Executive Officer  
Dublin City Council  
Civic Offices  
Wood Quay  
Dublin 8

**Date:** 30 November 2022

**Re:** BusConnects Ballymun/Finglas to City Centre Core Bus Corridor Scheme  
Ballymun/Finglas to Dublin City Centre

Dear Sir / Madam,

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

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

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

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

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

Yours faithfully,

Sarah Caulfield  
Executive Officer  
Direct Line: 01-8737287

HA03A

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Written Submission from Dublin City  
Council Chief Executive

to An Bord Pleanála

in relation to  
the National Transport Authority's

BusConnects Dublin – Ballymun/Finglas to City Centre Core Bus Corridor Scheme  
An Bord Pleanála Ref. HA29.314610



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## Appendix 1 – Recommended Conditions

## 1.0 Ballymun/Finglas to City Centre Core Bus Corridor Scheme

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

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### 1.1 Scope of Report

In accordance with Section 51 (3)(b) of the Roads Act 1993 (as amended), this submission sets out the views of Dublin City Council (a prescribed body), on the Ballymun/Finglas to City Centre Core Bus Corridor Scheme and the potential effects of the proposed development on the environment and the proper planning and sustainable development of the area.

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

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

### 2.0 Description of the Proposed Development

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

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

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

The proposed route is divided into three sections as follows:

- Section 1: St. Margaret's Road to Griffith Avenue;
- Section 2: Griffith Avenue to Phibsborough; and
- Section 3: Phibsborough to Arran Quay.

The Ballymun to City Centre Core Bus Corridor (CBC) commences on the Ballymun Road at its junction with St. Margaret's Road just south of M50 Junction 4. It is routed along Ballymun Road, St. Mobhi Road, Botanic Road, Prospect Road, Phibsborough Road, Constitution Hill and Church Street as far as Arran Quay, where it will join the existing traffic management regime on the North Quays.

Priority for buses is provided along the entire route, consisting primarily of dedicated bus lanes in each direction, with alternative measures proposed at particularly constrained locations along St. Mobhi Road and Botanic Road in Glasnevin.

Segregated cycle tracks will be provided along the full length of the route from the northern end to the Royal Canal just south of Hart's Corner in Phibsborough. An alternative cycle route is proposed along a part of the corridor in the southern half from Hart's Corner through Phibsborough to the Markets area of the western city centre.

Several urban realm upgrades, including widened footpaths, high quality hard and soft landscaping and street furniture will be provided in areas of high activity to contribute towards a safer, more attractive environment for pedestrians. The primary objective of the Proposed Scheme, therefore, is the facilitation of 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 Proposed Scheme is a key measure that delivers on commitments within the National Development Plan (2021-2030), the Transport Strategy for the Greater Dublin Area (2016-2035) the Climate Action Plan (2021) and the National Planning Framework 2040.

The proposed scheme comprises the following:

- 21.8km (two-way) of bus priority infrastructure and traffic management;
- 21.8 km (total both directions) of cycling infrastructure and facilities;
- New pedestrian/cyclist bridges over 2 railway lines and the Royal Canal in Phibsborough;
- A new pedestrian/cyclist bridge under North Circular Road in Phibsborough;
- Provision of new/refurbished pedestrian facilities and footpaths along the scheme and associated ancillary works;
- Provision of 78 new/refurbished raised table side entry facilities;
- Reconfiguration of existing bus stops resulting in 4 new stops and 65 number new bus stop facilities;
- Public Realm works including landscaping, planting, street furniture, street lighting, retaining walls, boundary walls and sustainable urban drainage (SUDS) measures;
- Roads associated earthworks including excavation of unacceptable material, importation of material, temporary storage of materials;

- Provision of road pavement, signing, lining and ancillary works;
- Provision of gates, fencing and boundary treatment works;
- Provision of new and diverted drainage infrastructure;
- Diversion of utilities and services including associated ancillary works; and
- Construction of accommodation works including boundary treatment and ancillary grading and landscaping works; together with all ancillary and consequential works associated therewith.

The Proposed Scheme will make significant improvements to pedestrian and cycling facilities and to bus priority. Some of the key changes that will be made to the existing corridor as a result of the Proposed Scheme are the following:

- In the southbound direction towards the city centre bus priority provision will increase from 50% to 95% along most of the route
- In the northbound direction from the city centre bus priority provision will increase from 42% to 78% along most of the route.
- Segregated cycle tracks will be provided in both directions over the full 6.7 km route.

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

- Ballymun Road
- St. Margaret's Road,
- St. Mobhi Road
- Botanic Road
- Prospect Road
- Phibsborough Road
- Constitution Hill
- Church Street as far as the junction with Arran Quay/Ormond Quay
- Finglas Road
- Prospect Road

(The proposed scheme is also routed within areas within the jurisdiction of Fingal Country Council)

The boundary of the proposed scheme includes areas of land-take to facilitate the construction and operational phases of the development.

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. The Construction Compounds will be located at the following sites:

- Construction Compound B1: Santry Cross;
- Construction Compound B2: St. Mobhi Drive;
- Construction Compound B3: Constitution Hill/Catherine Lane North Junction;
- Construction Compound F1: Mellows Park;
- Construction Compound F2: Finglas Place; and

- Construction Compound F3: Claremont Lawns

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

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

The EIAR notes that the aim of the proposed scheme is to provide improved walking, cycling and bus infrastructure on this key access corridor in the Dublin region, which will enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor.

*The outcomes achieved from delivering the Proposed Scheme, as set out in the EIAR, will be:*

- *An attractive, resilient, equitable public transport network better connecting communities and improving access to work, education and social activity;*
- *To facilitate a transport infrastructure network that prioritises walking and cycling and a mode shift to public transport; and*
- *To support increased economic and social potential through integrated land-use and transport planning to reduce the time burden of travel.*

The scope of this report deals with demonstrating how the proposed overall development is in accordance with the current Dublin City Development Plan 2016-2022 and the forthcoming 2022-2028 Development Plan policies and objectives.

## **2.1 Relevant Planning History**

Significant planning applications along and adjacent to the route include:

LRD6001/22-S3A Site at Daneswell Place, former Printworks/Smurfit Site, Botanic Road, Glasnevin, Dublin 9. Permission granted for 168 no. apartment units; crèche; café; resident amenity space; and an amenity management and a resident's gym.

3131/22 (LAW) Part 8 Proposal at Ballymun Civic Plaza, Shangan Road, Ballymun, Dublin 11. The development is to improve the public realm within Ballymun plaza through a series of landscape enhancements that aims to create an identifiable central core within Main Street to act as a focal point for Ballymun.

4145/22 Current application: 364-374 North Circular Road, Royal Canal Bank and 168-169 Phibsborough Road (former Des Kelly site). Includes demolition of all buildings on site (with the exception of 168 Phibsborough Road) and construction of new mixed use development with two retail units, coffee shop and 80 apartments in a development ranging in height from three to eight storeys (AI request provides for a reduction in height). 28 car parking spaces and 186 cycle parking spaces are



also proposed (number of car parking spaces likely to be reduced following AI request). The AI request also requires the applicant to liaise with the NTA to ensure that the development does not prejudice the Metrolink and BusConnects projects.

3361/22 (ABP-314691-22) Corner of Brunswick Street North and Church Street Upper, Dublin 7. Application for the construction of 52 residential units (each with private balcony/terrace) within three apartments blocks (A, B and C) ranging from 3 to 8 storeys, with a ground floor unit in Block A. Block A at 8 storeys comprises retail (c.106.1m<sup>2</sup>) a ground floor fronting both Church Street and Brunswick Street North, 28 no. residential units (15 no. 1 bed, 13 no. 2 bed) and a terrace at 7th floor (54.2m<sup>2</sup>). Block B at 6 storeys comprises 17 residential units (7 no. 1 bed and 10 no. 2 bed) with bin store and bicycle storage at ground floor level. Block C at 3 to 4 storeys comprises 7 no. residential units (4 no. 1 bed and 3 no. 2 bed). Pedestrian access to residential units is from Brunswick Street North. Permission is sought for all associated site development works, an ESB substation at ground floor level onto Church Street Upper, landscaping/public realm works and 108 no. bicycle parking spaces. Permission granted, subject to conditions. This decision was subject to a third party appeal. This appeal has not yet been decided.

SHD0028/20 (ABP-308875-20) Phibsborough Shopping Centre. SHD application for alterations to the permitted development, as permitted under DCC Reg. Ref.: 2628/17, ABP Reg. Ref.: ABP-300241-17, which included student accommodation, to now consist of the development of Build To Rent Shared Accommodation and other minor alterations to the permitted development. Permission granted, subject to conditions.

SHD0004/21 (ABP-309345-21) Old Bakery Site 113 Phibsborough Road, Cross Guns Bridge, Phibsborough. SHD application for 205 No. Build to rent units and associated site works. Permission granted, subject to conditions.

3391/20 (ABP-310686-21) 146-147 Phibsborough Road & 10 Eglinton Terrace, Dublin 7. Application for a mixed-use block consisting of a restaurant & cafe space together with associated waste management and plant room areas totalling 325 sq.m. at ground floor level. The upper levels will comprise 17 No. apartments above provided in 2.No blocks of six storeys to Phibsborough Road, five storeys to the rear set around a central courtyard space at first floor level containing the lift and access decks. Recessed balconies are provided throughout and projecting balconies are provided to the east elevation of the rear block. The apartments consist of nine one-bedroom apartments and eight two-bedroom apartments totalling 1492 sq.m including external circulation access decks. The proposed development also consists of 2.No three bedroom two storey townhouses totalling 207 sq.m. with private gardens and 3 No. car parking spaces to the rear. Vehicular access to the development is via the existing entrance to the St. Peter's Square Development while the townhouses are accessed separately via a laneway from Royal Canal Bank. Proposed landscaping and associated ancillary works include a communal open space, bicycle parking, permeable paving to the existing car parking area where 2. No. Spaces will be dedicated to the apartments in the new development. Permission granted, subject to conditions. This decision was subject to a third party appeal to An Bord Pleanála. The decision of the Planning Authority was upheld.

2080/17 58-64, Dominick Street Upper Application for the demolition of the existing vacant commercial building on part of the site and the construction of a 6 storey over lower ground

floor/basement level student accommodation development (247 no. bed spaces in 50 no. clusters, including 16 no. studios), including setback at fifth storey from Dominick Street Upper (north elevation) and to the west elevation. The proposed development is proposed be used for student accommodation or accommodation related to a higher Education Institute only during the academic year and student accommodation or accommodation related to a Higher Education Institute or tourist/visitor accommodation only during academic holiday periods- 58-64, Dominick Street Upper. Planning permission was granted, subject to conditions.

4262/16 (PL29N.248726) 274, North Circular Road, Dublin 7. Application for the construction of a student accommodation development with 444 no. bedspaces (420 bedrooms) with a gross floor area of 16,389 sq.metres contained within 9 no. blocks which range in height from 1 no. storey to 7 no. storeys with a single storey basement under Block E. All of the blocks (except for Block A, B and D) contain balconies. The proposal includes the refurbishment, change of use and extension of the single storey gate lodge to the north of the site from residential dwelling to student accommodation providing 4 no. bedrooms. The gross floor area of the gate lodge will increase from 67.7 sq.metres to 145 sq/metres. The proposed development includes a number of outdoor amenity areas and indoor ancillary services for occupants at ground floor level of Block E. 11 no. surface car parking spaces and refuse store are proposed on the western boundary with 210 no. sheltered bicycle spaces proposed at surface level distributed throughout the site. The proposed development is to be used for student accommodation or accommodation related to a Higher Education Institute only during the academic year and student accommodation or accommodation related to a Higher Education Institute or tourist/visitor accommodation only during academic holiday periods. Access to the development for vehicles and pedestrians is to be via the existing site access from North Circular Road, with access for pedestrians also provided via the existing gates onto the laneway from Rathdown Road. Permission is also sought for all ancillary engineering works, plant, storage, hard and soft landscaping, boundary treatments, site development works necessary to facilitate the development, including the provision of an ESB substation and switch room on the ground floor of Block E. Permission granted, subject to conditions. This decision was subject to a third party appeal to An Bord Pleanala. The decision of the planning authority was upheld.

2990/14 (PL29N.244466) 27-31 Church Street, Dublin 7. Application for the development of a part-5, part-6 and part-7 storey building over basement/ Lower Ground Floor Level accommodating: student accommodation over basement / lower ground floor, ground, first, second, third, fourth, fifth and sixth floor levels, comprising 35 no. 'house' units (ranging in size between 5 bed space and 8 bed space units) (232 no. bedrooms in total comprising 226 no. single bedrooms (including 5 no. disabled bedrooms) and 6 no. twin bedrooms), together with ancillary student accommodation facilities, such as social space, gym (and associated changing areas), pool room, laundry room, management office etc, (6,918.6sqm in total); café with ancillary takeaway at ground floor level (199 sqm) with associated external seating; and electrical substation and switch room (20.52 sqm). The total gross floor area of the proposed building will be 7,138.12 sq.m. The development will also consist of: the erection of 3 no. signs comprising 2 no. pin mounted signs, with rear illumination on the north and south elevations (measuring 8.66sqm each) and 1 no. stainless steel standing lettering sign on the west elevation (measuring 2.14 sq.m); the provision of a signage zone also to the west elevation measuring 14.13 sq.m boundary treatments, vehicular and pedestrian access via Church Street; 2 no. disabled access car parking spaces; cycle parking; associated lighting; associated site servicing (foul and service water drainage and water supply); the provision of SUD's measures, including the installation of an

underground rainwater harvesting tank, an attenuation tank and sedum roofs, and courtyards at Basement/Lower ground Floor and Ground Floor levels. The scheme also includes all hard and soft landscaping; lighting; changes in level; and all other associated site excavation and site development works above and below ground. Permission granted, subject to conditions. This decision was subject to a third party appeal to An Bord Pleanála where the decision of the planning authority was upheld.

## 2.2 Policy Context

### 2.2.1 Regional Level

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

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

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

### 2.2.2. Citywide Level

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

The Dublin City Development Plan 2016-2022 recognises the need for an efficient, integrated, and coherent transport network as a critical component of the Development Plan's Core Strategy. The City Council supports the improvement of public transport and cycling which will allow for higher density development, thereby creating a more sustainable interaction between land-use and transport. Chapter 8 of the City Development Plan 'Movement and Transport' sets out the Council's policies and objectives which are relevant to BusConnects.

Relevant policies include:

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

government's 'Smarter Travel' document and in the NTA's draft transport strategy are key elements of this approach.

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

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

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

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

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

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

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

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

#### **2.2.2.1.1 Strategic Development and Regeneration Areas**

Strategic Development and Regeneration Areas (SDRAs) are identified in the 2022-2028 Development Plan as areas capable of delivering significant quantum of homes and employment for the city. The

proposed Core Bus Corridor passes alongside the following SDRAs as identified in the Development Plan.

#### **SDRA 2 Ballymun**

The main focus of the SDRA was to prepare a local area plan for Ballymun which was made in 2017. This SDRA has therefore been superseded by the Ballymun Local Area Plan.

#### **SDRA 8 Grangegorman/Broadstone**

The proposed core bus corridor route affects the Phibsborough Road and Constitution Hill which serve Grangegorman. The guiding principles for this area are captured by the overall vision set out in the Grangegorman SDZ.

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

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

##### **2.2.2.1.2.1 Ballymun Local Area Plan 2017**

In October 2017, the Ballymun Local Area Plan (LAP) was adopted for 6 years. In October 2022 the elected members of DCC voted to extend the life of the LAP up until October 2027 to enable the continued implementation of the LAP objectives. The LAP will remain a statutory plan for the area for the duration of the proposed works.

The LAP contains the following Movement objectives:

It is an objective of Dublin City Council to: -

*MO1: Complete the outstanding pieces of road infrastructure required to enhance connectivity and to service the remaining development sites. All new road schemes will be delivered in accordance with the Principles of Road Development set out in the NTA's 'Transport Strategy for the Greater Dublin Area 2016-2035' (reference Section 5.8.3 of NTA Strategy).*

*MO2: Work with Fingal County Council and the NTA to ensure the provision of a high-quality rail transport system (Metro North) is delivered through Ballymun. In order to protect the character of the emerging Main Street, the LAP is seeking that the future Metro line respects the desire for enhanced permeability, with the line ideally run underground until the junction with Santry Avenue. Further realignment of the Main Street should also provide for enhanced and segregated cycle facilities.*

*MO3: Facilitate the delivery of a core bus corridor through Ballymun as proposed in the NTA Transport Strategy.*

*MO4: Work with the NTA to ensure that the recommendations of the bus network review are implemented in Ballymun, in particular seeking a new connection between Ballymun and Dublin Airport.*

*MO5: Ensure all new developments are designed with permeability in mind and are cycle and pedestrian friendly.*

M06: Explore the potential for a new access point at Santry Demesne with Fingal County Council and Trinity College Dublin.

M07: Explore the provision of a cycle lane on Santry Avenue in tandem with the NTA 'Bus Network Review'.

M08: Explore the potential of a multi-storey car park near Main Street as part of a sustainable travel strategy.

It is clear from the objectives outlined above that the LAP supports the provision of a core bus route through Ballymun (M03) and the provision of segregated cycle facilities along Main Street (M02). While this route does not connect to the Airport, it is noted that the Bus Connects Project makes provision for future revisions to the Bus Network including a new direct link between Ballymun and Dublin Airport (route 19).

Concerning Objective M01, and the outstanding road infrastructure projects set out in the LAP, attention is drawn in particular to the proposed new East-West link identified as a future road project, see Fig 9 of the LAP below. The LAP seeks a new-west link connecting the neighbourhoods of Balcurris and Coutry, provided within Site 6 of the LAP to the east of Main Street and between sites 4 and 5 to the west. Attention is drawn to this objective concerning the proposed location of the bus stops in this vicinity. The NTA should ensure that the proposal put forward does not jeopardise the deliverability of the LAP objective.

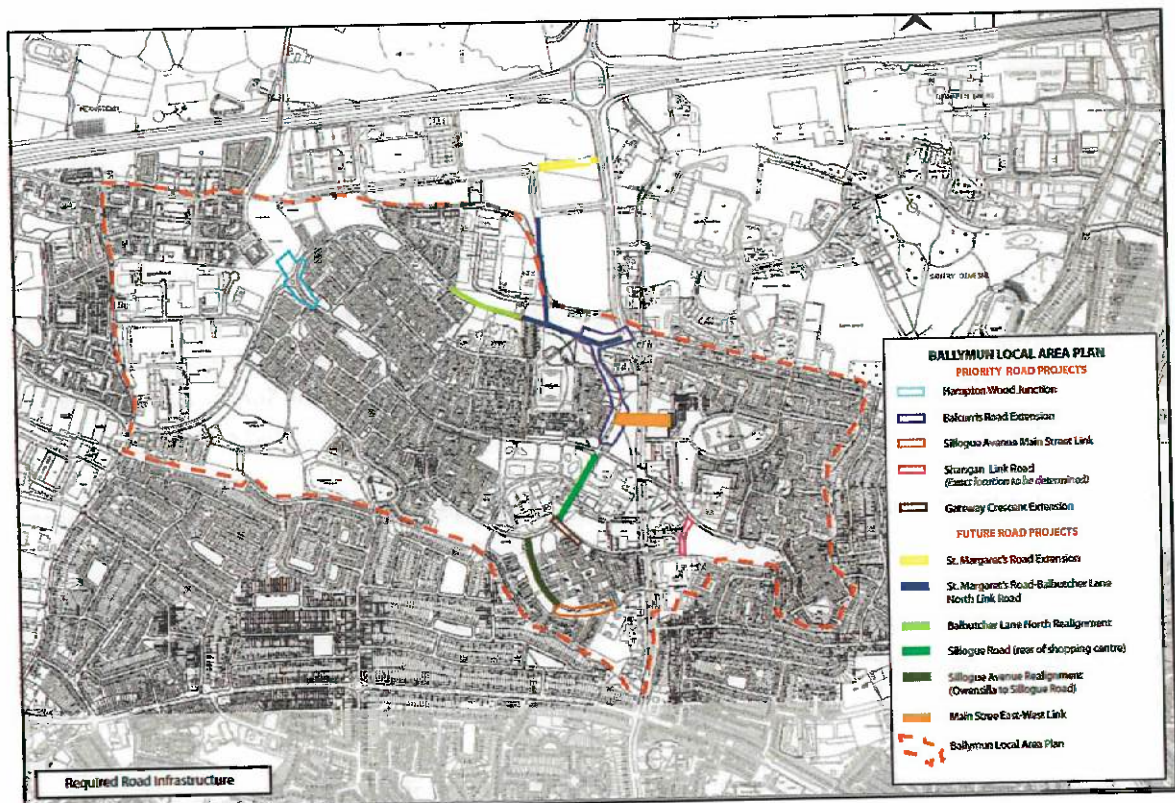


Figure 9

### *Ballymun Main Street*

There are two key issues relating to Ballymun Main Street where it is considered improvements should be sought. These relate to:

- (1) car parking provision and location.
- (2) landscape treatment.

Ballymun Main Street as set out in the LAP extends for 1km from the Gateway housing development in the south to Santry Cross in the north. While some sites along this route have been developed, others remain vacant sites awaiting redevelopment. It is considered that the treatment of the Ballymun Main Street should be addressed in its entirety concerning materials, landscape treatment and car parking provision. The current proposal provides a very different approach to the southern end of Main Street in the vicinity of the Civic Plaza, Cearnóg an tSeachtar Laoch, as opposed to the northern end of the street, which remains largely undeveloped. While the northern end of Main Street has a high level of vacancy the Economic Objectives as set out in the LAP, in particular E01, E02, and E04 seek the provision of new mixed uses and employment-generating uses along Main Street.

Concerning car parking provision along Main Street and Objective M08 above, it is acknowledged that the provision of a multi-storey car park is clearly outside the remit of this project, however, there is a need to ensure that there is some level of parking to serve the commercial Main Street, to support the economic viability of existing and future commercial, recreational and cultural uses, and aspirations to create Ballymun as a destination point, in keeping with its District Centre status under the City Development Plan. In this regard, the proposed removal of on-street parking on either side of Main Street, to the south of Santry Cross and the lack of alternative provision in this location is considered detrimental to the existing and future commercial uses south of Main Street.

Conversely, the proposed provision of significant new car parking between the Plaza, Cearnóg an tSeachtar Laoch and the old Shopping Centre site (Site 1 of the LAP) is considered at odds with the urban design objectives for this location. It is a key objective of the LAP to support pedestrian connectivity and to link the plaza and Site 1, both visually and physically at this location. This is even more important in the context of the proposed Metrolink station at this location. The applicant should have regard to the Part 8 Planning consent granted for the Plaza in September 2021 (Reg. Ref. 3131/21), the on-site works of which are expected to commence in 2023. The overprovision of car parking at this particular location, as proposed, would seriously detract from the creation of a pedestrian-focused civic space. The design brief for Site 1 within the LAP states:

*“In order to provide a central hub for this significant Main Street development site, it is a specific objective of the LAP (Objective UD2), that an area of open space is provided fronting onto Main Street. Synergies between this space and the Plaza, Cearnóg an tSeachtar Laoch, across the road are desirable, e.g. unity in landscape treatment.”*

It is also considered that the proposed tree line colonnade on either side of Main Street, as proposed for the southern portion of Main Street, should be extended north through the scheme, to the northern end of Main Street as a minimum, and preferably as far as the M50, as sought in the LAP objectives as set out below for reference. Materials should tie in and complement those already installed along Main Street.

The LAP set out clear objectives for urban form and design specifications for Main Street. The following objectives are considered to be of particular relevance:

#### *Objective*

*UD1: Create high-quality urban spaces through the use of quality urban design.*

*UD2: Implement the urban form and design objectives set out in detail within Section 5.5.2 of the LAP.*

*UD3: Complete the Main Street creating an attractive space within which to live, shop, do business and socialise.*

#### *Section 5.5.2: Main Street Objectives:*

- To create an identifiable central core within Main Street to act as a focal point for Ballymun. This should include the improvement and visual upgrading of the plaza space in front of the axis to define the space and improve its use.*
- To incorporate an open space area in front of the existing shopping centre site to tie in with the open space in front of the axis and reinforce a sense of arrival to the centre of Ballymun. This needs to be a quality built environment to instil a sense of arrival and encourage people to stop and shop/ do business along Main Street.*
- To provide a secondary civic public open space to the south of Santry Cross (west of Main Street), directly opposite St. Pappin's Nursing Home (a projected structure).*
- To delineate Main Street with a colonnade of trees and additional hard and soft landscaping. This should be continued along the R108 to the M50 interchange.*
- The provision of a station for Metro North (or any alternative rail-based system through the area) should integrate successfully with the 'civic precinct' and improve the functionality of this important space. Ease of pedestrian movement from one side of the road to the other is required. These crossings should be implemented with the build-out of the street and provided at suitable locations to support existing uses and services. Significant barriers to movement will not be accepted.*

#### *Materials and Design*

- New public footpaths should be permanent and constructed using the same materials as already in place (e.g. Shannon paving and marshal curbs).*
- To provide a shared vocabulary of materials and details within each community and area to give a distinct identity. This includes the public realm, street furniture, kerb details, street lighting, planting species, boundary treatments etc.*
- To select good quality and durable materials and design. The choice of materials and their details are crucial for the enduring quality of the project. Materials and details should be appropriate for the individual locations and have regard to the existing palette of materials.*

#### *R108 between Santry Cross and the junction with St Margaret's Road:*

North of Santry Cross the scheme bounds Site no. 31 of the LAP, a portion of which is located in the DCC administrative area, and the balance within Fingal County Council (FCC). This site which is owned by DCC is at the feasibility stage to provide high-density uses alongside a new municipal GAA facility. No detailed designs have been prepared to date, and as such future proposals will take account of the Bus Connects proposals and future Metrolink designs. As noted above, it would be preferable for the



street edge to provide a tree colonnade at this location. Given that the site has not progressed to date, this should be achievable in the space.

#### **2.2.2.1.2.2 Finglas Strategy 2021**

DCC's Planning and Property Development Department prepared the Finglas Strategy 2021 as a non-statutory high-level study to address opportunities for urban regeneration and placemaking in the area. The Strategy provides an analysis of the existing environment and sets out a series of recommendations for the area which informed the Draft Dublin City Development Plan 2022-2028.

The Draft Dublin City Development Plan 2022-2028, includes a new Strategic Development and Regeneration Area (SDRA) for Finglas Village and its environs, informed by the Finglas Strategy. It includes provisions for enhancing the urban form and streetscape in the village and measures to improve pedestrian movement and accessibility.

In particular, the SDRA includes the following guiding principle:

- *Enhanced pedestrian movement and accessibility underpin the urban design strategy illustrated in the SDRA Guiding Principles map. Proposed enhancements to routes and proposed new connections should respond to desire lines and include landscaping and tree planting. Barriers to such movement, including existing pedestrian bridges over the Finglas Road are considered significant challenges to achieving a cohesive urban structure. As such, the feasibility of replacing such pedestrian bridges with at-grade crossings will be actively explored and aligned with Bus Connects and Luas Finglas proposals.*

The proposed layout for the CBC route indicates that the current pedestrian bridge on Church Street, over Finglas Road, be maintained. Separately, a new toucan crossing is proposed to the immediate south of the existing footbridge and a break in the wall to Church Street is proposed to enhance the pedestrian crossing at grade.

As per the SDRA of the Draft Dublin City Development Plan, 2022-2028 DCC is seeking the removal of this footbridge. Re-connecting Church Street, linking St Canices and the proposed new village triangle is a key element in the urban design plan for Finglas Village. The removal of the pedestrian bridge is a critical component to realising this vision and establishing a better setting for the historic St Canice's Church and graveyard. The present location of the proposed toucan crossing is also problematic, in so far that it does not align with Church Street and pedestrian desire lines. The toucan crossing should be located in a similar alignment to the present footbridge, as close to Church Street as possible to achieve the desired level of connectivity along Church Street, between St Canices and the Village centre.

Further north along the route it is noted that the existing pedestrian bridge over the Finglas Road (near the junction with Casement Road and St Margaret's Road) is also shown to remain. However, it is further noted that the proposals by Luas Finglas which significantly alter the arrangement of the roundabout at this location includes provision for the removal of the overhead pedestrian bridge and the replacement with an enhanced at-grade pedestrian and cycle facility. It is recommended that a similar approach be sought at this location, in keeping with the SDRA recommendations.

### 2.2.2.1.2.3 Phibsborough LEIP

The Phibsborough Local Environmental Improvements Plan (LEIP) 2017-2022, was carried out as an objective of the Dublin City Development Plan 2016-2022. It is a working document that focuses on a range of actions to improve the local environment, in particular the public realm.

Many objectives from the LEIP are linked to/ impacted on by the bus corridor proposals, of particular note:

#### Public Realm and Open Space Objectives:

- *No. 2 Create a new civic space linking the Library to 'the Soldier' denoting an entrance to the Village and enhanced access and connection to Broadstone Park. As part of this explore options for screening the gable of the old cinema (Des Kelly's).*
- *No. 8: Implement the objectives of the Dublin City Canals Report and this Plan, in association with Waterways Ireland and the National Transport Authority, namely:-*
  - *New cycle and pedestrian track along the Royal Canal*
  - *New bridges over the canal, at Mountjoy Prison, Cross Guns Bridge and Mount Bernard Park.....*
- *No. 9. Continue to develop Blessington Street Park and Basin: including.....*
- *Upgrade the entrance to the Park from the North Circular Road, and the setting of the 'Soldier', to include new access gates, pedestrian and cycle access and landscaping.*
- *No. 10. Carry out landscape improvements to the Royal Canal Bank, west of Mountjoy Prison. Long-term objectives for this site include the integration into the wider redeveloped Mountjoy Prison site and the removal of the Eircom building to allow for streetscape/landscape enhancements.*
- *Movement and Transport Objectives*
- *No. 31. Carry out a review of Doyle's Corner and the junction of Phibsborough Road and Connaught Street, following the operation of Luas Cross City with an objective of seeking visual and public domain improvements and enhancing pedestrian and cyclist experiences.*
- *No. 32. Review the safety of the existing footpath at Westmoreland Bridge and provide a widened/ new bridge if deemed suitable.*
- *No. 33. Seek to provide additional crossings over the Canal and railway to enhance pedestrian permeability, and use of the Canal bank for both sports and recreation.*

It is considered that the proposed Bus Corridor Scheme offers opportunities to deliver on a number of the LEIP objectives noted above, in particular as it relates to the proposed new cycle route along the Royal Canal bank. Opportunities created by the new cycleway should be exploited to enhance the public domain creating attractive streetscapes, enhanced public spaces and more pedestrian-friendly spaces. Detailed drawings for the public space at the library/ Solider should be agreed with DCC's Park Department.

Concerning footpath widening, it is noted that the proposal includes the widening of an existing rail bridge north of Whitworth Road but does not appear to include proposals for the widening of Westmoreland Bridge. Westmoreland Bridge was identified in the LEIP as of particular concern for pedestrian safety. The drawings show some realignment of the traffic lanes at this location, and this

perhaps provides additional pedestrian space at this location. This should be clarified in addressing the proposal.

Finally, the use of materials in and around the core of Phibsborough village should take account of the historic nature of this space and should ensure that any surviving historic streetscape features are retained, as sought for within the Phibsborough Centre, Architectural Conservation Area report 2015.

#### **2.2.2.1.2.4 Phibsborough Centre ACA and Prospect Square/De Courcy Square ACA**

The proposed route passes through the Phibsborough Centre Architectural Conservation Area. The proposed route also passes close to Prospect Square/De Courcy Square Architectural Conservation Area.

#### **2.2.2.2 Dublin City Development Plan 2022-2028**

The 2022-2028 Dublin City Development Plan was adopted by the elected members on the 02/11/22 and will come into effect on the 14/12/2022. It sets out the policy context for the next six years to 2028. A significant number of policies have relevance for the delivery of transport infrastructure in the city.

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

Chapter 8 sets out the planning authority's policies in relation to sustainable movement and transport. The policy approach promotes the integration of land use and transportation, improved public transport and active travel infrastructure such as walking and cycling. The policy promotes an increased shift towards sustainable modes of travel.

#### **Relevant policies include the following:**

*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 placemaking 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.*

## **STRATEGIC DEVELOPMENT AND REGENERATION AREAS**

As with the current Development Plan, Strategic Development and Regeneration Areas (SDRAs) are identified in the 2022-2028 Development Plan as areas capable of delivering significant quantum of homes and employment for the city. Refer to Section 2.2.2.1.2.2 in relation to the new SDRA for Finglas Village and its environs.

### **2.3 Departmental Reports**

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

- Environment and Transportation Department – including comments from Traffic, Roads, Public Lighting and Environmental Protection Divisions
- Archaeology Division
- Conservation Section
- City Architects Division
- Housing and Community Services Department
- Parks Department

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

### **2.4 Planning Assessment:**

#### **2.4.1 Planning Policy**

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

At citywide planning level, the Dublin City Development Plan 2016-2022 and the recently adopted City Development Plan 2022-2028 sets out policies and objectives required to achieve its Core Strategy. The proposal has been considered with regard to this Core Strategy and the policies and objectives of both the current Dublin City Development Plan and the forthcoming Plan, and in particular the dual aspirations of delivering necessary transport infrastructure to facilitate compact growth while also protecting Natura designated sites.

#### **2.4.2 Environmental Impact Assessment Report (EIAR)**

A comprehensive EIAR is provided with the application documents examining the project under all relevant impacts and finds generally that the development would not adversely impact on existing

environmental amenities. As An Bord Pleanála is the competent authority with regard to the acceptability or otherwise of the EIAR, it is not the role of Dublin City Council to comment on the acceptability or not of the EIAR and its findings but the content points generally to the development having negligible impact on the existing environment.

### 2.4.3 Natura 2000

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

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

The Natura Impact Statement prepared by the applicant identifies the following SPA and SAC designated areas in the vicinity of the proposed development, with the approximate distance from the site:

#### Special Areas of Conservation (SAC)

Rye Water Valley/Carton SAC	12.6km
Rogerstown Estuary SAC	11.3km
North Dublin Bay SAC	5.7km
South Dublin Bay SAC	4.km
Baldoyle Bay SAC	8km
Malahide Estuary SAC	7.6 km
Howth Head SAC	11km
Rockabill to Dalkey Island SAC	11.7km
Lambay Island SAC	17.8km
Glenasmole Valley SAC	11.4km
Wicklow Mountains SAC	11.9km
Ireland's Eye SAC	12.9km

#### Special Protection Areas (SPAs)

North Bull Island SPA	5.7km
South Dublin Bay & River Tolka Estuary SPA	2.7km
Baldoyle Bay SPA	8.2km
Malahide Estuary SPA	7.7 km
Wicklow Mountains SPA	12 km
Ireland's Eye SPA	12.6 km

Rogerstown Estuary SPA	11.7 km
Howth Head Coast SPA	13.8 km
Dalkey Islands SPA	13.9 km
Lambay Island SPA	17.8 km
Skerries Islands SPA	21.5 km
Rockabill SPA	22.4 km
The Murrough SPA	30.7 km

This NIS has examined and analysed, in light of the best scientific knowledge, with respect to those European sites within the Zone of Influence of the Proposed Scheme, the potential impact sources and pathways, how these could impact on the sites' QI habitats and species and SCI species and whether the predicted impacts would adversely affect the integrity of the five SACs and 12 SPAs listed above. The NIS considered that there are no other European sites at risk of effects from the Proposed Scheme. Avoidance, design requirements and mitigation measures are set out within the NIS [and its appendices] and they 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 risk of adverse effects on these European sites.

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

The Natura Impact Statement objectively concludes that following an examination, analysis and evaluation of the relevant information, including in particular the nature of the predicted impacts from the Proposed Scheme and with the implementation of the mitigation measures proposed, 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, and there is no reasonable scientific doubt in relation to this conclusion.

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

In the current Dublin City Development Plan (2016-22) and forthcoming Plan 2022-2028 the area along the proposed route includes lands with the following zoning objectives: Z1 (residential), Z2 (residential conservation areas), Z3 (neighbourhood centre), Z4 (district centres), Z5 (city centre), Z6 (employment/enterprise), Z9 (open space), and Z10 (Inner Suburban and Inner City Sustainable Mixed Uses).

For the most part, the proposed scheme is situated on lands within the existing public road and pedestrian area where there is no specific zoning objective. It does however pass through an area designated as an architectural conservation area (ACA), which is the Phibsborough Centre ACA.

Appendix 21 of the development plan defines a 'public service installation' as '*a building, or part thereof, a roadway or land used for the provision of public services. Public services include all service installations necessary for electricity, gas, telephone, radio, telecommunications, television, data transmission, drainage, including wastewater treatment plants and other statutory undertakers: bring centres, green waste composting centres, public libraries, public lavatories, public telephone boxes, bus shelters, etc. but does not include incinerators/waste to energy plants. The offices of such undertakers and companies involved in service installations are not included in this definition.*'

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

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

#### **2.4.5 Impact on amenity**

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

#### **2.4.6 Strategic Observation from the Forward Planning Department of Dublin City Council**

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 current Dublin City Development Plan (2016-22) 'Movement and Transport' sets out the Council's policies and objectives which are relevant to Bus Connects, which include, *inter alia*, policies in relation to sustainable transportation, modal shift and supporting and facilitating the development of an integrated public transport network, with efficient interchange between transport modes, serving the existing and future needs of the city.

The Proposed Scheme will help to achieve the strategic objectives envisaged in the forthcoming Dublin City Development Plan 2022-2028 pertaining to: compact and sustainable urban growth; sustainable mobility and permeability; and placemaking, while significantly contributing towards climate action. While the Proposed Scheme is supported, it is important that the Core Bus Corridor adequately addresses conservation impacts along the route as well as the potential to improve green infrastructure and pedestrian and cycle connectivity.



In general, the Proposed Scheme is supported by the high level policies in place in both the current Dublin City Development Plan 2016-2022 and the 2022-2028 Dublin City Development Plan. There are a number of specific issues relating to Ballymun Main Street (car parking provision and location, landscape treatment), the R108 between Santry Cross and the junction with St. Margaret's Road, the new SDRA recommendations for Finglas village and environs and the objectives of the Phibsborough LEIP that the applicant could be requested to address as set out above.

In addition, in relation to the construction compounds proposed, it is recommended that a landscape proposal be prepared following the site works for Construction Compound B1 at Santry Cross. It is noted that an amount of space will remain providing an opportunity for appropriate landscaping post construction. Other issues have been raised in relation to the construction compounds and are included in the relevant Department's comments below.

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

The Environment and Transportation Department has provided comments under the headings of General Comments, Traffic Division, Roads Division, and Environmental Protection Division. These comments are as set out in italics below.

##### **2.4.7.1 General Comments**

The Department is generally supportive of the improvements to bus and cycling infrastructure proposed in the overall context of encouraging a shift to sustainable mobility. In this regard the proposal generally aligns with the policies expressed in the current and forthcoming Dublin 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 forthcoming development Plan with a view to safeguarding the city as a place in which to live, work, visit and do business.

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

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

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

#### **2.4.7.2 Traffic Division**

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

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

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

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

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

The design of this scheme is complex, particularly from the Griffith Avenue/ Mobhi Road Junction through to Whitworth Road with insufficient space to cater for all modes and so necessitating complex traffic re- routing. In addition the scheme does remove some existing parking and loading bays in order to provide the require levels of priority for buses and the provision of safe cycle facilities. The loss of this parking and loading, while appropriate in the delivery of this high quality public transport scheme, nevertheless does mean that deliveries to local businesses especially will need to be addressed in the day to day management of the scheme.

The use of Bus Gates along portions of this route to compensate for the lack of continuous bus lanes by using dynamic traffic management will be challenging and require careful installation and monitoring. In addition the deployment of Camera based bus lane enforcement will need to have been rolled out on this corridor before the full benefit of the scheme in terms of bus journey reliability can be achieved.

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

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

#### Specific comments on locations

##### Sheet 6 of 37

Clarity should be sought on the purpose of the new parking at the school on the inside of the bus lane, as it would not appear to be something that is needed or desirable.

##### Sheet 8 of 37

The Mobhi Road/ Griffith Avenue junction and adjacent junctions would need to be carefully reviewed as part of the detailed design phase, as the design does not reflect the changes that have been made in this area to enhance cycling during Covid. The proposed expansion of the number of traffic lanes on Griffith Avenue extension / Ballymun junction from the current one lane in each direction to two lanes is not supported by the City Council and should be resolved in the detailed design process.

##### Sheet 13 of 37

The Metrolink stop at Glasnevin is a key interchange and the interaction of pedestrians/ cyclist and bus users should be taken into account. The option of a bus stop outside the station should be investigated. Please note the NCBI office is around the corner and there is a need to ensure that the designs in this area are coordinated with the Metrolink design and take specific account of the high numbers of visually impaired pedestrians in this area.

##### Sheet 17 of 37

The junction design with the reduction of the right turning pocket ( northbound) at the junction of Church Street and North Kings street will most likely lead to delays along the route which could impact on Luas service. This design should be reviewed during the detailed design process.

##### Sheet 18 of 37

The left turn slip of the Luas lane should be removed and the pedestrian crossing straightened otherwise the stop line on Church Street should be set back in order to straighten the pedestrian crossing

##### Sheet 23 of 37

Please note this roundabout is removed with the Luas design, consideration should be given to ensuring that the design of the two public transport systems are aligned/co-ordinated.

##### Sheet 30 – 35 -36 of 37

A number of yellow boxes are shown on the bus lane with an arrow pointing right, their purpose is not clear.

##### Sheet 37 of 37

The cycle crossing on the Finglas Road after the junction with Prospect Way, there are concerns how this is to be safely controlled as there is no space for traffic signals shown on the drawing and no stop line shown.

The scheme directly works with and impacts the proposed Metrolink project which is also in front of the Board and it is a requirement that there is close liaison between the two projects. In addition the proposed Luas to Finglas also crosses part of this scheme. Therefore DCC recommends that it is a requirement to establish a coordination group made up of the NTA, TII, DCC and the various construction contractors to ensure maximum integration and to provide a forum for resolving any issues which may arise.

#### Project Delivery Mechanism

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

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

#### **2.4.7.3 Roads Division**

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

#### **ROADS DIVISIONS' LOCATION SPECIFIC COMMENTS**

##### General Comments

In general terms, Bus Connects proposes substantial improvements to bus and cycling infrastructure, with provision of additional signalised crossings for pedestrians along the routes. The schemes, including the Ballymun Finglas scheme, could be improved by making greater provision for pedestrians by ensuring sufficient and appropriate footpath widths based on pedestrian flows (with an absolute

minimum 2m width) and also by ensuring pedestrian priority throughout the routes. Where minimum 2m footpaths are proposed, cognisance must be taken of street lighting and furniture which may actually restrict access. There are recurring situations throughout the schemes where user priority is unclear, for example at bus stops and where cycle routes cross footpaths. Grade or physical separation between cycling facilities and footpaths is recommended and running cycle tracks through footpaths and pedestrianised areas should be avoided. Ensuring pedestrian priority is important particularly in the context of people with accessibility issues including visual impairments. Pedestrians, in accordance with all levels of policy, should be ensured priority through signage and other appropriate measures. A condition is recommended in this regard.

An Bord Pleanála's attention is drawn to another inherent element of all the Bus Connects scheme designs, specifically the reallocation of kerbside space. While it is accepted that additional space for bus and cycle lanes may need to be created through the removal of on street parking and loading facilities, this has to be necessarily balanced with the requirement for loading and servicing. Such activities are crucial for the general functional operation of the city and to the achievement of the 15 Minute City where people can walk and cycle to local shops and services. In this regard, it is important that the ability of local services and businesses to operate is safeguarded and that the schemes demonstrate that sufficient kerbside space will be retained for same, particularly in urban villages and city centre locations. An Bord Pleanála is also reminded that kerbside space is necessary to facilitate accessible access and accessible car parking. A condition is recommended regarding the above.

Regarding the current scheme before An Bord Pleanála, there is considerable interaction between the Ballymun Finglas Scheme and other significant transport infrastructure projects, specifically Metrolink, the Railway Order application for which has been lodged. It is crucial that both projects align with regard to phasing and timing of works, cumulative impacts including traffic and other environmental impacts, street layouts and interconnection and interchange between modes. The Scheme also interacts with Luas to Finglas and should align in a similar manner with that project.

Regarding particular aspects of the scheme design, it is noted that in a number of locations throughout the Ballymun Finglas Scheme the cycle track arrangement is shown between the grass verge (at the edge of the carriageway) and the footway. Positioning the verge between cycle track and footpath (cycle track on the outside) could allow both hard surfaced areas to drain to the verge, providing SuDS functionality. Likewise, positioning the grass verge between the footway and cycle track would remove the need for tactile warning between footpath and cycle track. Amending the alignments of the cycle track and verge relative to one another should be considered.

It is also noted that several bus stops are designated as "Small Island" but the design detail for same appears not to have been provided. The island areas appear very narrow and it is not clear how pedestrian priority across the cycle tracks will be enforced in particular for vulnerable users at these locations.

Footpath widths appear very narrow along parts of the Finglas Road between Finglas Village and Old Finglas Road. A minimum footpath width of 2m should be maintained wherever possible. Footpaths along Mobhi Road also appear narrow. Consideration should be given to widening footpaths where possible.

Further detailed comments on the current scheme are provided below.

#### Location Specific Comments – GA Drawings

##### Sheets 1 & 2

Management of the interaction between the scheme and Metrolink is crucial particularly the timing and phasing of works for the two projects.

An Bord Pleanála is advised that the lands to the west of the scheme form part of the Ballymun Local Area Plan (Site 31), for which a masterplan has been prepared. The northern half of site 31 is intended for use as the launch site for Metrolink.

It is noted that temporary acquisition of lands at south west corner of Site 31 is proposed. It is not clear however how this will impact on the masterplan layout.

##### Sheet 6

On street car parking layout along the western side of Ballymun Road opposite Our Lady of Victories Church and between 165 and 139 Ballymun Road should take cognisance of existing driveways and dishing required for same which extends 900mm from either side of the vehicular access point.

Regarding the local shops at the junction of Ballymun Road and St. Pappin Road, it is not clear what the exact impact of scheme works will be on the access and parking arrangements to the shops, particularly the two access points along Ballymun Road.

##### Sheet 8

The cycle track is shown between the grass verge and footway. A Section drawing for Sheet 8 does not appear to be included in submission (Section EE is on Sheet 9). It is not clear therefore if a grade separation between the cycle track and footpath is still proposed. As per general comment above, consideration should be given to routing the cycle track outside the verge.

The rationale for having both single lane and two way cycle tracks on Griffith Avenue is not clear.

The inbound cycle track cuts through the footpath at the junction of Ballymun Road and St. Mobhi Road (at house numbers 86-90). This arrangement introduces a footpath pinch point and results in a very large island in front of the cyclist waiting area at the junction. Consideration should be given to revising the size of the island so that the reduction in footpath width is not as significant. A smaller island closer to the junction could still maintain a refuge for right turning cyclists at the junction.

Footpaths on St. Mobhi Road are narrow. Consideration should be given to the widening the footpaths.

##### Sheet 9

The cycle track is shown between the grass verge and footway. As per general comment above, consideration should be given to routing the cycle track outside the verge.

The rationale for having both single lane and two way cycle tracks on St Mobhi Road is not clear. Given space constraints in this location, provision of two single cycle tracks and reallocation of space to pedestrians would be preferable.

#### Sheet 10

The cycle track is shown between the grass verge and footway. As per general comment above, consideration should be given to routing the cycle track outside the verge.

The rationale for having both single lane and two way cycle tracks on St Mobhi Road is not clear. Given space constraints in this location, provision of two single cycle tracks and reallocation of space to pedestrians would be preferable.

Consideration should be given to routing the cycle track along the outside of the green area on St Mobhi Drive and the footpath along the inside. This will remove need for the footpath to cross the cycle track.

#### Sheet 11

Outbound island bus stop at house nos. 163-167 is extremely large. Location of cycle track completely bisects the footpath at 163/161 and runs very close to shop fronts including a Pharmacy and as such it may obstruct pedestrians and in particular those with accessibility issues entering and existing the shops. Consideration should be given to reduce the size of island to provide continuous footpath inside cycle track.

The cycle track is shown between the grass verge and footway. As per general comment above, consideration should be given to routing the cycle track outside the verge.

#### Sheet 12

Layout of junction of Prospect Way with Botanic Road is very complicated. The cycle lane runs through the island crossing pedestrian desire lines and pedestrian waiting areas.

Complicated junction arrangement at Botanic Road/Prospect Way has resulted in pedestrian crossing across Prospect Way being moved far from the desire line. This may result in pedestrians attempting to cross at the junction instead of the dedicated crossing point. Consider planting part of the island at Finglas Road and Prospect Way.

Undersized island bus stop to the left of Lindsay Grove would involve passengers effectively boarding and alighting from a two way cycle track. It is not clear how passenger and cyclist movements will be controlled or whether the two way cycle track will be signalised.

The rationale for the requirement for two separate bus stops either side of Lindsay Grove is not clear.

#### Sheet 13/14

Two way cycle track merges with footpath at Whitworth Road. It is illegal to cycle on footpaths.

A shared footpath and cycling surface appears to be indicated south of the junction with Whitworth Road completely bisecting the pedestrian area. Proximity to NCBI premises means there is a likelihood of visually impaired users in this area. Such an alignment may prove difficult for these users to safely navigate. Shared surfaces of this nature are not favoured in the National Cycle Manual. Further information regarding the proposed layout would be useful.

At Phibsborough Shopping Centre the scheme takes in part of the shopping centre site reducing the existing car parking area fronting onto Phibsborough Road. There is concern regarding the impact on parking and access layout. It is not clear if adequate space is provided in the car park for safe circulation. It is also noted that the existing servicing arrangements include service vehicles entering from Phibsborough Road and servicing from this car park. It is not clear if the revised access will accommodate the swept path/auto tracking for service vehicles and whether the revised layout can accommodate the circulation of service vehicles through the car park.

#### Sheet 14

Of note is what appears to be specified materials across the carriageway at North Circular Road annotated as 'Headed Granite Boundary Heritage'? It would appear that granite materials are proposed to be provided within the carriageway? Any alterations to materials in the public road require the agreement of Roads Maintenance and must comply with Dublin City Council standards.

#### Sheet 15

Short sections ( $\approx 50\text{m}$ ) of outbound cycle track merging with bus lanes seem unnecessary over such short distances. The purpose of their inclusion is not clear.

#### Sheet 16

Short sections ( $\approx 50\text{m}$ ) of outbound cycle track merging with bus lanes seem unnecessary over such short distances. The purpose of their inclusion is not clear.

#### Sheet 17

Parking that is being removed from Ann St. North does not appear to be annotated on drawings.

An Bord Pleanála's attention is drawn to the Dublin City Council prepared Markets Area Public Realm Masterplan, which takes a strategic look at the overall area.

Short sections ( $\approx 50\text{m}$ ) of outbound cycle track merging with bus lanes seem unnecessary over such short distances. The purpose of their inclusion is not clear.

#### Sheet 18

The two perpendicular car parking spaces are located too close to the junction and should be omitted for safety reasons.

Short sections ( $\approx 50\text{m}$ ) of outbound cycle track merging with bus lanes seem unnecessary over such short distances. The purpose of their inclusion is not clear.

#### Sheet 20



Cycle track runs through footpath between Claremont Ave and Church Ave. Consideration should be given to re-routing the cycle track along the outside of the footpath to reduce the likelihood of pedestrian/cyclist conflict, increase footpath capacity and remove potential drainage issues.

Right turn for cyclists from Glasnevin Hill onto Ballymun Road requires crossing two lanes of traffic travelling straight through and making this manoeuvre from the kerb line. It is not clear how this movement is to be safely controlled.

#### Sheet 21

At entrance to Bon Secours hospital, new bus stop is annotated but not shown on layout.

#### Sheet 23

At McKee/St. Margaret's, the scheme interacts with Luas Finglas and Dublin City Council's Jamestown Masterplan. Management of the interaction between projects in respect of timing and phasing of works is important.

#### Sheet 30

Outbound cycle track is shown between grass verge and footway south of The Griffith. As per general comment above, consideration should be given to routing the cycle track outside the verge.

#### Sheet 32

The island protecting the cycle track at the south east corner of the junction with Old Finglas Road is overly large. The footpath is narrow at this location. If this island were reduced in size to be closer to those at the north east corner of this junction, more space could be allocated to providing greater footpath width. As it is, this island does not benefit any type of road user.

#### Sheet 36

Cycle track runs through footpath at junction with Claremont Lawns. Consideration should be given to re-routing the cycle track along the outside of the footpath to better manage pedestrian/cyclist interaction, increase footpath capacity and remove potential drainage issues.

Location of cycle track immediately outside park entrance is undesirable due to pedestrian activity at this location. Lengthy deflection of cycle track from carriageway may be unpopular with cyclists. Consider re-routing Cycle track along outside of car park.

Regarding the new car parking layout along Finglas Road opposite Glasnevin Cemetery which replaces perpendicular parking, it is not clear if sufficient aisle/circulation space has been provided to ensure the revised layout works. No dimensions or cross section details appear to have been provided.

#### Section Drawings (Appendix B4)

No Section drawing has been provided for GA Sheet 8

#### Section EE (GA Sheet 9)

The cycle track width indicated will only allow single file cycling. No grade separation or tactile warning is indicated between the cycle track and footpath. The narrowness of the cycle track means that

overtaking cyclists may impinge on footpath bringing them potentially into conflict with pedestrians. Consideration should be given to routing the cycle track outside (i.e. on the carriageway side of) the verge.

#### Section FF (GA Sheet 10)

The cycle track width indicated will only allow single file cycling. No grade separation or tactile warning is indicated between the cycle track and footpath. The narrowness of the cycle track means that overtaking cyclists may impinge on footpath bringing them potentially into conflict with pedestrians. Consideration should be given to routing the cycle track outside (i.e. on the carriageway side of) the verge.

#### Section GG (GA Sheet 11)

No grade separation or tactile warning is indicated between the cycle track and footpath. Consideration should be given to routing the cycle track outside (i.e. on the carriageway side of) the verge.

#### Section QQ (GA Sheet 30)

A grade separation has been between the cycle track and surrounding footpath and green verge. Such a vertical alignment would result in surface water, litter and fallen leaves accumulating in the cycle track reducing cyclist ride quality and making maintenance difficult. Consideration should be given to routing the cycle track outside (i.e. on the carriageway side of) the verge.

#### Section TT (GA Sheet 36)

The position of the cycle track at the back of footpath is very unusual, particularly given its location at the entrance to a park. The grade separation introduced here would result in surface water, litter and fallen leaves accumulating in the cycle track reducing cyclist ride quality and making maintenance difficult. Consider re-routing cycle track along the carriageway side of the car park.

### **2.4.7.5 Environmental Protection Division**

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](http://www.dublincity.ie) Forms and Downloads). In particular:

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

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

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

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

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

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

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

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

**The following more detailed comments shall be addressed:**

1. 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. In particular:
  - There is an opportunity for a nature based solutions at junction of Kylemore road and Ballyfermot Road (B2875) which has not been shown in the drawings.
  - Has consideration been given to soft landscaping as opposed to Tank / Pond provided as shown on Ballyfermot Road (B3200)?
2. While it is accepted that approximate design Attenuation Calculations and impermeable area calculations are shown as hatched areas, the exact areas are to be provided in the format set out in the Legend, in the drawings provided at detailed design stage.
3. The drawings are to be checked throughout the submission to ensure compliance with the Greater Dublin Regional Code of Practice. Currently, manholes are missing throughout the design at the start of piped networks and at multiple junctions.
4. River networks are to be included in the catchment drawings as they are missing and hence the drawings show outfalls going to illogical locations.
5. How the swales are to be maintained is difficult to understand with the locations of the manholes connecting multiple swales? This is to be clarified at detailed design stage.
6. Design check at Ballyfermot Road (B3800-B4200), the attenuation volume provided in the text box (129m<sup>3</sup>) is not consistent with that shown in the leader (117m<sup>3</sup>), this needs to be clarified.
7. Design check on Sarsfield Road (B4200-B4700) volumes provided to be clarified.
8. Design to be in accordance with Sustainable Drainage Design & Evaluation Guide 2021, for example (A360) the connection of the swales is to be clarified.

Water Framework Directive

The proposed Ballymun/Finglas to City Centre Core Bus Corridor transverses two significant river catchments within the Dublin City Council administrative area, namely, the Upper Liffey Estuary and the River Tolka. Albeit all waterbodies are subject to the European Union Water Framework Directive, both these waterbodies are specifically highlighted in the River Basin Management Plan (RBMP) as 'Priority Areas for Action' with a requirement to protect and restore the river status to a 'good' designation or better, in addition to being protected under Article 4 of the WFD. Currently the Tolka River is of 'moderate' status & the Lower Liffey Estuary is of 'Good' status.

Dublin City Council is obliged to achieve a water quality status of 'good' or better with all priority waterbodies by December 2027. To support our achievement of our legislative obligations, the

Ballymun Finglas to City Centre CBC proposal should not cause a deterioration of the status of any waterbody which it is contiguous with downstream and furthermore should not jeopardise the attainment of good ecological and good surface water chemical status, in accordance with our obligations. In particular, all surface water that discharges from the curtilages of the Ballymun Finglas to City Centre CBC proposal into existing or proposed waterbodies should be intercepted and treated, using nature based solutions wherever possible.

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

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

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

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

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

#### Flood Prevention

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

- Cross sections for crossings of the Tolka River and section beside it and the Finglas Stream.
- Detailed section of Royal Canal crossing.
- Plan for dealing with local pluvial flooded areas.
- Climate Change Flood Adaption Plan for river crossings.

- FRA should give more detail on the river and canal crossings.

#### **2.4.8 Archaeology Section Observations**

##### Background

The corridor for the proposed Ballumun/Finglas to City Centre Bus Connects scheme traverses the Zone of Archaeological Constraint for Recorded Monument DU018-020 (Historic City) from Constitution Hill to the southern termination of the scheme at Aran Quay/Inns Quay. This Recorded Monument DU018-020 (Historic City) is listed on the Record of Monuments and Places (RMP) and is subject to statutory protection under Section 12 of the National Monuments (Amendment) Act 1994. The proposed route also passes through the Zone of Archaeological Constraint for Recorded Monuments DU014-066 (Finglas Historic Town) and DU018-005 (St Mobhi Ecclesiastical Site). The above Recorded Monuments are identified as Zones of Archaeological Interest in the current Dublin City Development (2016-22) and Dublin City Development Plan 2022-2028.

The Ballymun Section of the Proposed Scheme will commence in Ballymun and will continue to Glasnevin where it will meet the Finglas Section at Hart's Corner. The Finglas Section of the Proposed Scheme will pass west of Glasnevin, along the perimeter of Glasnevin Cemetery, while the Ballymun Section will pass the early medieval monastic site and along the east side of the Botanic Gardens. The lands of Glasnevin and Finglas have seen significant change over the years but have their origins as early medieval ecclesiastical establishments. The Proposed Scheme will travel into the City Centre via Phibsborough and Constitution Hill before terminating at Arran Quay. It will cross the Royal Canal at Cross Guns Bridge and continue south under Phibsborough Road before entering the Zone of Archaeological Potential (ZAP) of the Historic City of Dublin at Constitution Hill next to Broadstone, the former railway terminus.

Prior to the development of the Royal Canal, the area would have been drained by the River Tolka and the River Bradogue, which is named after Glas mo Canoc, or Canoc's Stream. Within the ZAP for the Historic City of Dublin (RMP DU018-020), human occupation can be traced back to the prehistoric period, with Viking settlement in the early medieval period, and continued occupation throughout the medieval and post-medieval periods. One of the most significant of these phases is the earliest 'urban' development of the area when Oxmantown became an important Viking suburb on the north side of the River Liffey. Church Street is shown on the earliest maps of Dublin and was variously referred to as the 'Great Street', 'High Street', 'the King's Way', 'the Great Street of Oxmantown' and 'Oxmantown Street'.

Remnants of Dublin's industrial heritage can be found throughout Dublin City and its wider environs (e.g. the canals, tramlines and railways, mill buildings and mill races, breweries and factories of the 18th and 19th centuries), some of it upstanding, the rest possibly surviving below-ground. Many of Dublin's streets and roads also contain historic street furniture, such as limestone and granite kerb stones, cobblestones, cast-iron post boxes, water pumps, milestones, coal-hole covers, street lighting, statues, water troughs, railings, and protective bollards.

##### EIAR

The archaeological and cultural heritage impacts of the construction phase and operational phase associated with the construction and operation of the Ballymun/Finglas to City Centre Core Bus Corridor Scheme are assessed in Chapter 15 of the Environmental Impact Assessment Report (EIAR), which was prepared by Lisa Courtney and Dr Claire Crowley of Courtney Deery Archaeology Ltd. This report provides a comprehensive desk study of published and unpublished documentary and cartographic sources, supported by a field survey. There are 32 archaeological heritage features on the Records of Monuments and Places / Sites and Monuments Record, eleven on the Dublin City Industrial Heritage Record, and twelve cultural heritage assets as well as 11 areas of archaeological potential assets that have the potential to be impacted within the Proposed Scheme. The EIAR identifies the potential impact for each of the above sites/assets.

The EIAR report demonstrates that there is the potential for the discovery of previously unknown below ground archaeological features, materials and deposits along the Proposed Scheme including the subsurface remains of early dwellings and cellars. Section 15.4.1 of the EIAR states Ground-breaking works required for the construction of the Proposed Scheme may cause impacts to archaeological heritage. From an archaeological perspective, ground-breaking works (for the purpose of the Proposed Scheme) refers to the following activities:

- Pavement construction, repairs and reconstruction works;
- Resurfacing works;
- Piling; and
- Any excavations of soil, including landscaping works, ground disturbance for utilities and grubbing up works.

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

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

Given the results of previous geophysical survey and archaeological testing at a newly discovered enclosure site (located at Home Farm Football Club pitch), archaeological investigation in consultation with the Department of Housing, Local Government and Heritage is recommended in the EIAR within the land take for the retaining wall on St. Mobhi Road, prior to works.

Section 15.5 of the EIAR addresses the proposed archaeological mitigation measures that will be applied should archaeological features be encountered during works.

- The NTA will procure the services of a suitably-qualified archaeologist as part of its Employer's Representative team administering and monitoring the works.
- The appointed contractor will make provision for archaeological monitoring to be carried out under licence to the DHLGH and the NMI, and will ensure the full recognition of, and the proper excavation and recording of, all archaeological soils, features, finds and deposits which may be disturbed below the ground surface.

- All archaeological issues will be resolved to the satisfaction of the DHLGH and the NMI. The appointed contractor will ensure that the archaeologist will have the 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.

The EIAR proposes that 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).

## **2.4.9 Conservation Assessment**

### **Introduction**

This assessment has been carried out by the Conservation Section in the context of both the Dublin City Development Plan 2016-2022 and the forthcoming Dublin City Development Plan 2022-2028 which comes into effect on 14<sup>th</sup> December 2022, other key policy documents and best conservation practice. It is submitted that the following policies and provisions in particular should be taken into account in the consideration of all proposed routes and their impacts on the architectural and built heritage of the city:

#### **Dublin City Development Plan 2016 – 2022 (Volume 1)**

Chapter 11 – Built Heritage and Culture, 11.1.1, “The built heritage contributes significantly to the city’s identity, to the collective memory of its communities and to the richness and diversity of its



urban fabric. The street pattern, local architectural features, the form of buildings and spaces, civic buildings within set pieces of urban design, the unique Georgian squares and streets, together with the larger areas of Victorian and Edwardian architecture north and south of the canals, and the industrial buildings of traditional enterprises, all contribute to the city's character, identity and authenticity, and together form a key social, cultural and economic asset for the development of the city".

**Section 11.1.2** "....Heritage in all its components contributes to a high quality of life for everyone".

It is the Policy of Dublin City Council:

**CHC2** "To ensure that the special interest of Protected Structures is protected. Development will conserve and enhance Protected Structures and their curtilage and will: ....d) Not cause harm to the curtilage of the structure;" Walls, railings, gates, gardens and planting within the curtilage of a Protected Structure are considered to be part of, and contribute to the architectural character and setting of the Protected Structure.

Section 11.1.5.3 states ".....The curtilage of a Protected Structure is often an essential part of the structure's special interest. In certain circumstances, the curtilage may comprise a clearly defined garden or grounds, which may have been laid out to complement the design or function.....the retention of landscaping and trees (in good condition) which contribute to the special interest of the structure shall also be required".

It is the Policy of Dublin City Council:

**CHC3:** "To identify and protect exceptional buildings of the late 20th century; to categorise, priorities and, where appropriate, add to the RPS." Thus, consideration must be given to any 20th century buildings of quality that may be added to the RPS, and would be affected by the proposed works.

**Section 11.1.5.4** addresses Architectural Conservation Areas and Conservation Areas and states: "The Planning and Development Act, 2000 (as amended), section 81(1), requires that a development plan shall include an objective to: Preserve the character of a place, area, group of structures or townscape.....Architectural Conservation Areas and Conservation Areas have been designated in recognition of their special interest or unique historic and architectural character and important contribution to the heritage of the city.....all of these areas require special care in terms of development proposals and works by the private and public sector alike, which affect structures both protected and unprotected in these areas".

It is the Policy of Dublin City Council:

**CHC4:** "To protect the special interest and character of all Dublin's Conservation Areas (including Architectural Conservation Areas, Conservation Areas and areas zoned Z2 and Z8 in the Dublin City Council Development Plan 2016-2022). 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....

Development will not:

1. Harm buildings, spaces, original street patterns or other features, which contribute positively to the special interest of the Conservation Area...

#### 4. Harm the setting of a Conservation Area”

**Section 1.1.5.6 states** “All new development must have regard to the local context and distinctiveness and the contribution to the local scene of buildings, landmarks, views, open spaces and other features of architectural, historic or topographical interest.”

It is the policy of Dublin City Council:

**CHC7:** “To protect and manage trees in Architectural Conservation Areas”.

16.10.18 - Parking in the Curtilage of Protected Structures and in Conservation Areas - that “every reasonable effort is made to protect the integrity of the Protected Structure and/or conservation area.”

16.10.19 - Non-Residential and Commuter Off-Street Parking in the Curtilage of Protected Structures and in Conservation Areas – that “its impact on the integrity, setting, character and amenities of the Protected Structure and/or conservation area will be critically assessed.”

#### **Volume 2 Appendix 7 - Stone Setts to be Retained, Restored or Introduced**

The proposed works should take into account any areas that contain historic stone setts noted in Appendix 7 of the current Development Plan, and take all practicable measures to avoid loss of or damage to historic materials and features. The Applicant should comply with the requirements of the Architectural Heritage Protection Guidelines for Planning Authorities 2011 – 14.4.1 and the Department of Arts, Heritage and the Gaeltacht (now the Department of Housing, Local Government and Heritage) Advice Series Paving – The conservation of historic ground surfaces and best conservation practice.

#### **Volume 2 Appendix 8 - Paved Areas and Streets with Granite Kerbing**

The proposed works should take into account any areas that contain historic paving/kerbing noted in Appendix 8 of the current Development Plan, and take all practicable measures to avoid loss of or damage to historic materials and features. The Applicant should comply with the requirements of the Architectural Heritage Protection Guidelines for Planning Authorities 2011 – 14.4.1 and the Department of Arts, Heritage and the Gaeltacht (now the Department of Housing, Local Government and Heritage) Advice Series Paving – The conservation of historic ground surfaces and best conservation practice.

#### **Dublin City Development Plan 2022-2028 (Volume 1)**

Chapter 11 – Built Heritage and Culture, 11.1.1, “It is recognised that the city’s heritage contributes significantly to the collective memory of its communities and to the richness and diversity of its urban fabric. It is key to the city’s character, identity and authenticity and is a vital social, cultural, and economic asset for the development of the city. The City’s historic buildings, streetscapes, villages, Georgian terraces and squares, Victorian and Edwardian architecture, industrial heritage, institutional landmarks, modernist buildings of the 20th century, urban core and the Medieval City, together with its upstanding monuments and buried archaeology contribute to its local distinctiveness and help create a strong sense of place for citizens and visitors to the city and its neighbourhoods.”

It is the Policy of Dublin City Council:

**BHA2** "Development will conserve and enhance Protected Structures and their curtilage and will: ...e) does not adversely impact the curtilage or the special character of the Protected Structure;" h) Protect and retain important elements of built heritage including historic gardens, stone walls, entrance gates and piers and any other associated curtilage features.

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

It is the Policy of Dublin City Council:

**BHA15:** "To encourage the appropriate development of exemplar twentieth century buildings and structures to ensure their character is not compromised." Thus, consideration must be given to any 20th century buildings of quality that may be added to the RPS, and would be affected by the proposed works.

**Section 11.5.2 and 11.5.3** addresses Architectural Conservation Areas and Conservation Areas and states: "The Planning and Development Act, 2000 (as amended), provides the legislative basis for the protection of Architectural Conservation Areas (ACAs). Under the Act, section 81(1), requires that a development plan shall include an objective to: Preserve the character of a place, area, group of structures or townscape.....Architectural Conservation Areas and Conservation Areas have been designated in recognition of their special interest or unique historic and architectural character and important contribution to the heritage of the city.....all of these areas require special care in terms of development proposals and works by the private and public sector alike, which affect structures both protected and unprotected in these areas".

It is the Policy of Dublin City Council:

**BHA7:** "To protect the special interest and character of all areas which have been designated as an Architectural Conservation Area (ACA). Development within or affecting an ACA must contribute positively to its character and distinctiveness, and take opportunities to protect and enhance the character and appearance of the area and its setting, wherever possible...."

Development shall not harm buildings, spaces, original street patterns, archaeological sites, historic boundaries or features, which contribute positively to the ACA.

d) Seek the retention of all features that contribute to the character of an ACA including boundary walls, railings, soft landscaping, traditional paving and street furniture.

e) Promote sensitive hard and soft landscaping works that contribute to the character and quality of the ACA.

f) Promote best conservation practice and encourage the use of appropriately qualified professional advisors, tradesmen and craftsmen, with recognised conservation expertise, for works to buildings of historic significance within Architectural Conservation Areas.

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

Appendix 4 – 4.3.7 - Parking in the Curtilage of Protected Structures and in Conservation Areas  
“Where site conditions exist which can accommodate car parking provision without significant loss of visual amenity and/or historic fabric, proposals for limited off-street parking will be considered”

Appendix 6 - Stone Setts to be Retained, Restored or Introduced

The proposed works should take into account any areas that contain historic stone setts noted in Appendix 6 of the 2022-2028 Development Plan, and take all practicable measures to avoid loss of or damage to historic materials and features. The Applicant should comply with the requirements of the Architectural Heritage Protection Guidelines for Planning Authorities 2011 – 14.4.1 and the Department of Arts, Heritage and the Gaeltacht (now the Department of Housing, Local Government and Heritage) Advice Series Paving – The conservation of historic ground surfaces and best conservation practice.

Appendix 6 - Paved Areas and Streets with Granite Kerbing

The proposed works should take into account any areas that contain historic paving/kerbing noted in Appendix 6 of the 2022-2028 Development Plan, and take all practicable measures to avoid loss of or damage to historic materials and features. The Applicant should comply with the requirements of the Architectural Heritage Protection Guidelines for Planning Authorities 2011 – 14.4.1 and the Department of Arts, Heritage and the Gaeltacht (now the Department of Housing, Local Government and Heritage) Advice Series Paving – The conservation of historic ground surfaces and best conservation practice.

#### **Dublin City Tree Strategy 2016 – 2020**

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

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

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

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

## **Architectural Heritage Protection Guidelines for Planning Authorities (2011)**

Consideration of proposals affecting boundary features:

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

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

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

### **14.4.1 Street Furniture and Paving**

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

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

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

#### **Assessment**

The potential impact of the proposed development on the architectural heritage of this route and on the following categories in particular, has been assessed:

- Protected Structures and Proposed Protected Structures and their settings
- 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) and Conservation Areas
- Lands zoned Z2 in the Dublin City Development Plan 2022-2028, which aims to “protect and / or improve the amenities of residential conservation areas”
- Lands zoned Z8 in the Dublin City Development Plan 2022-2028, which aims “to protect the existing architectural and civic design character, and to allow only for limited expansion consistent with the conservation objective”
- Historic Paving and Kerbing

## General Response

The comprehensive assessment on architectural heritage, streetscape and the urban environment submitted as part of the EIAR and the proposed mitigation measures across the scheme is generally welcomed.

Chapter 17 – Landscape (Townscape) & Visual Impact Assessment is also welcomed. This states that ‘proposals for the treatment of the public realm within the streetscape impacted by the Proposed Scheme will have regard to the existing character of the street or location, to emerging policies, objectives and proposals for the public realm and to opportunities for mitigation of impact on the public realm and the streetscape. Proposals will have regard to historic details and features, to the quality of existing and proposed materials, to the reduction of clutter, ease of legibility, and management and maintenance requirements’.

It is noted that some elements of architectural heritage have not been correctly represented, or have been incorrectly labelled in the documents and on the supporting mapping. These are set out in detail in the Conservation report.

## Key Impacts

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

### Protected Structures (& proposed) and their setting

- a) Substantial temporary land acquisition at St Mobhi Road, will affect the existing granite gate piers (with ornamental cast-iron lamps) and gate screen of Whitehall College of Further Education (RPS 7746) and its associated boundary railings. It is not clear what works are proposed in relation to the existing granite gate piers and gate screen which is considered to be of architectural significance. The Conservation Section recommends that carefully considered method statements are provided for the protection of the existing granite gate piers/gate screen and for the removal and sympathetic reinstatement of the boundary railings. It is noted that photomontages provided confirm that the railings shall be reinstated in a sympathetic like-for-like manner.
- b) A large number of trees situated within the grounds of Whitehall College of Further Education (RPS 7746), will be removed as part of the substantial temporary land acquisition along the eastern side of St. Mobhi Road. The loss of the existing mature tree line will have a direct impact on the setting of the Protected Structure. Compensatory tree planting shall be provided in this location.
- c) Temporary land acquisition is proposed immediately to the southeast of the watchtower, involving the removal of the late 20th century boundary treatments and opposite the main entrance to Glasnevin (Prospect) Cemetery (RPS 2745) involving the removal of soft landscaping. Careful consideration should be given to the reinstatement of the site boundaries and soft landscaping following the completion of works.
- d) It is proposed to relocate the existing bus stop located to the front of the former Player’s Factory on Botanic Road (RPS 855). No details have been provided in relation to the new bus

- stop/shelter as part of the works. The installation of a new bus shelter at this location will negatively impact on the character and settings of the Protected Structure. The design of any new shelter should be carefully considered with the aim of minimising potential negative visual impacts, to support the reduction of clutter and to improve legibility of the Protected Structure/NIAH rated structure and its setting.
- e) Land acquisition along the eastern side of Botanic Road on the General Arrangement drawings), will affect the protected boundary walls/railings and southern gate piers of the former Player's Factory (RPS 855). This. The Conservation Section notes that railings, gates, piers and plinth are specifically included in the extent of protection as outlined under the RPS entry for the former factory and that the boundary features were recorded independently of the factory by the NIAH (Ref. 50130162). The relocation of the railings and southern entrance will have an adverse impact on the setting of the Protected Structure and will significantly impact the legibility of the boundary, particularly as the drawings indicate the northern entrance gates will not be moved. It is the recommendation of the Conservation Section that the works to the boundary of the Protected Structure be carefully designed to ensure the legibility of its setting is maintained and not adversely impacted. The mitigation measures outlined in Section 16.5.1.1 Protected Structures of Chapter 16 with regard to the boundary are noted. The Conservation Section recommends that carefully considered method statements are provided for the removal and reinstatement of the railings, plinth and gate piers, ensuring their authenticity and character are maintained.
  - f) Westmoreland Bridge (a Proposed Protected Structure, RPS 8807), constructed c.1864 Phibsborough Road over the Royal Canal and replacing an earlier bridge. The decorative quality of the cast-iron parapets combined with the ashlar piers creates an appealing terminus to the vista travelling westwards along the canal bank. The setting of the bridge will be adversely impacted by the proposed bridge to its east which appears to be quite bulky in its iteration on the photomontages. The design of the new bridge combined with the slope of the cycle path up to it represent a significant intervention to the landscape of the Royal Canal in this location. The Conservation Section recommends that any bridge proposed in this area is carefully considered to ensure the setting of the Regionally rated bridge is not further eroded and negatively impacted.
  - g) Significant landscaping works are proposed to the front site of Phibsborough Library (a Protected Structure, RPS Ref. 8884) which will result in the removal of the historic railings. The full scale of the impact of the works to Royal Canal Bank Park, including the provision of a new underpass for cyclists and pedestrians is not fully outlined in the application. It is noted that a bridge (Blaquiere Bridge) previously carried North Circular Road over the Royal Canal in this location, with the library and park now constructed on the infilled canal. The impact on surviving remnants of the canal and the historic bridge are to be determined and proposed works in this location should include some recognition of the historic layout of this area. The proposed underpass should be of the highest architectural quality to ensure the setting of the Protected Structure and the Park are not adversely impacted. It is recommended that the historic railings be retained to ensure the setting of the Protected Structure is safeguarded.
  - h) A new bus stop is proposed in front of the former Broadstone Station building (RPS Ref. 2029). No details have been provided in relation to the new bus stop/shelter as part of the works. The installation of a new bus shelter at this location will negatively impact on the character and settings of the Protected Structure. The design of any new shelter should be carefully

considered with the aim of minimising potential negative visual impacts, to support the reduction of clutter and to improve legibility of the Protected Structure/NIAH rated structure and its setting.

- i) New public realm works located to the front of St Michan's Church (RPS 1550) require careful consideration to ensure the proposed new pavement treatments do not negatively impact the setting of the Protected Structure.
- j) Bus stops/shelters are located in close proximity to the following Protected Structures and Proposed Protected Structures – St. Canice's church, graveyard and stone cross (RPS 1552), Woodland's Lodge (RPS 4849), Glasnevin (Prospect) Cemetery including all perimeter walls, entrance gates, watchtowers and former Superintendent's Lodge (RPS 2745), St Michan's Church (RPS 1550), Stone façade of CIE Mechanical Engineering/Roads Department building, including return gable walls (RPS 6724), 22 Phibsborough Road (RPS 6725), 23 Phibsborough Road (RPS 6726) and Former Player's Factory (RPS 855). It is noted on the General Arrangement drawings that the existing bus stops will generally be retained in their current positions. However, no details have been provided in relation to any proposed upgrading of the bus stops and/or the installation of shelters as part of the works. The installation of new bus shelters at these locations will negatively impact on the character and settings of these Protected Structures. The design of any new shelter in these locations should be carefully considered with the aim of minimising potential negative visual impacts, to support the reduction of clutter and to improve legibility of the Protected Structures and their settings. Of particular concern is any replacement or upgrades to bus shelters along Glasnevin (Prospect) Cemetery which has been identified in Appendix A16.2 as being of 'High' sensitivity and of 'National' significance. The installation of new shelters or upgrades to existing shelters at this location would negatively impact their character and setting including the views along and into the cemetery.
- k) There are a number of additional structures included on the Record of Protected Structures on the subject map sheets. These structures are located in close proximity to the route boundary. While there are no direct adverse impacts on these structures apparent, however there may be indirect impacts as a result of the proposed works during the construction phase of the project. All Protected Structures in close proximity to construction works are to be adequately protected and all proximate works are to be supervised by a conservation professional.

**Buildings and other non-Protected Structures (post boxes/milestones etc.) and historic landscapes included on the National Inventory of Architectural Heritage (NIAH)**

- a) The proposed temporary land acquisition at Scoil an tSeachtar Laoch and the CDET B Adult Education on Ballymun Road may impact on the sylvan setting of former Stormanstown House which is recorded on the NIAH Garden Survey (NIAH 2363).
- b) There is potential for the proposed relocation of a bus stop to the front/west of the Church of Our Lady of Victories (NIAH 50130121) to negatively impact on the setting of this regionally rated 20th century church. It is noted that the proposal includes the removal of a number of trees which will further impact on the setting of the church.
- c) The bus corridor passes over Dean Swift Bridge (NIAH 50130053) on St. Mobhi Road. Any potential modification/strengthening works should be cognisant of the historic fabric. There



- is the potential for the bridge (decorative parapet) to be damaged during realignment of the existing kerbs. Supervision of the work by a conservation professional will be required.
- d) The removal of a number of trees situated on the southern approach to Dean Swift Bridge (NIAH 50130053) at Botanic Road will have a direct impact on the setting of this regionally rated structure.
  - e) Bus stops/shelters are located in close proximity to the following NIAH Structures Glasnevin (Prospect) Cemetery including the Boundary Wall and Gates (NIAH 50130070), and former Gate lodge/Superintendent's Lodge (NIAH 50130094). It is noted on the General Arrangement drawings that the existing bus stops will generally be retained in their current positions. However, no details have been provided in relation to any proposed upgrading of the bus stops and/or the installation of shelters as part of the works. The installation of new bus shelters at these locations will negatively impact on the character and settings of these structures. The design of any new shelter in these locations should be carefully considered with the aim of minimising potential negative visual impacts, to support the reduction of clutter and to improve legibility of the structures and their settings. Of particular concern is any replacement or upgrades to bus shelters at Glasnevin (Prospect) Cemetery which has been identified in Appendix A16.2 as being of 'High' sensitivity and of 'National' significance. The installation of new shelters or upgrades to existing shelters at this location would negatively impact their character and setting including the views along the streetscape.
  - f) Significant landscaping works, noted above with respect to RPS 8884 (Phibsborough Library), will result in the relocation of NIAH Ref. 50060267 (monument within Broadstone Park) on North Circular Road. The NIAH notes that the monument is the focal piece of the park and consequently its relocation will have a significant adverse impact on this regionally rated structure and on the landscape of the park. It is acknowledged that the relocation of the statue is necessary to facilitate the provision of the underpass and the Conservation Section recommends that its new location permits the monument to continue to be a focal point. There is the potential for the post box to be damaged as a result of construction work. The monument should be adequately protected and all works are to be supervised by a conservation professional.
  - g) The route travels along part of the former Royal Canal (Branch) which ran to the original canal terminus at Broadstone. The canal was infilled in the 1930s and a linear park (Broadstone Park) laid out along its route (NIAH 50060268). The proposed cycle route through a section of the park and will result in the removal of a section of railings and stone plinth at the western end of Royal Canal Walk. Historic steps bringing the park up to the level of North Circular Road will be removed to facilitate the insertion of the proposed underpass.
  - h) Former garage, Prospect Road (NIAH 50130199), built c.1930 (now in use as a pub). The General Arrangement drawing shows a proposed new bus stop close to the front elevation which will detract from the setting of the NIAH 'Regionally' rated structure. The installation of a new bus stop/shelter will negatively impact on the character and setting of this NIAH 'Regionally' rated structure. The design of any new shelter in this location should be carefully considered with the aim of minimising potential negative visual impacts, to support the reduction of clutter and to improve legibility of the structure and its setting.
  - i) It is noted on the General Arrangement drawings that existing bus stops will be retained in their current positions in close proximity to a number of structures assigned a Regional rating by the NIAH. However, no details have been provided in relation to any proposed upgrading

of the bus stops/shelters as part of the works. The installation of new bus shelters at these locations will negatively impact on the character and settings of these buildings. The design of any new shelter in these locations should be carefully considered with the aim of minimising potential negative visual impacts, to support the reduction of clutter and to improve legibility of the Protected Structures/NIAH rated structures and their settings.

- j) There are a number of additional sites recorded by the NIAH on the subject map sheets. There are no direct adverse impacts on these structures apparent, however there may be indirect impacts as a result of the proposed works during construction phase of the project. NIAH structures/sites in close proximity to construction works are to be adequately protected and all proximate works are to be supervised by a conservation professional.

#### **Structures on the Dublin City Industrial Heritage Record Survey (DCIHR)**

- a) The bus corridor passes over the site of Wad Bridge (DCHIR 14\_15\_003) located at Our Lady of Victories Primary School on the Ballymun Road. This has not been identified on Fig16.1 Architectural Heritage. Although it is acknowledged that no trace of this bridge survives above ground it is possible that some remains survive beneath the ground surface. Any potential modification/strengthening works should be cognisant of the historic fabric.
- b) The route passes over the Finglas Bridge/Tolka Bridge DCIHR 18\_02\_032. The bridge was rebuilt in the late twentieth century as part of a road widening scheme. Any potential modification/strengthening works should be cognisant of the historic fabric.
- c) It is proposed to widen the deck bridge carrying Prospect Road over the over the Great Southern and Western Railway's extension to North Wall quays (DCIHR 18 03 019), constructed c.1875. The parapet of this bridge has been replaced, however the remainder of the historic bridge structure remains largely intact. The proposed widening of this bridge is to be carefully considered to ensure the integrity of the historic structure is retained. The stone retaining walls along the railway line also contribute to the industrial heritage of the city and any interventions to the walls should be designed and supervised by a conservation professional.
- d) It is proposed to construct a bridge across the Royal Canal (18 03 001) to the east of Westmoreland Bridge. The proposed bridge will impact on the setting of the canal and its former tow path (18 03 002). All works to the canal bank should be designed and supervised by a conservation professional to ensure the setting of the canal is not adversely impacted. Proposed railings along the sloped pathway rising to the new bridge and the bridge itself should be of high architectural design to preserve the historic integrity of this significant landscape within the city.
- e) The route travels along part of the former Royal Canal (Branch) which ran to the original canal terminus at Broadstone (18 07 030). The canal was infilled in the 1930s and a linear park laid out along its route. All works along the route of the former canal should be carefully monitored to record and surviving remnants of the canal and the former Blacquiere Bridge (18 07 033), which carried the North Circular Road over the canal.
- f) The Nos. 19 and 20 trams from Rialto to Glasnevin ran along Botanic Avenue, Prospect Road and Phibsborough Road as far as North Circular Road (DCHIHR 18 03 041 and 18 07 027). It is possible that remains of the tramway survive beneath the current roadway.
- g) It is acknowledged that archaeological monitoring under licence (as defined in Chapter 15) will take place to include all DCIHR sites.

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

- a) Post Box: There is the potential for the post box on Ballymun Road (CBC0304PB001) to be damaged as a result of construction work. The post box should be adequately protected.
- b) Unprotected Houses: There are a number of houses on St Mobhi's Road (CBC0304BTH003) that contribute positively to the streetscape but are not protected under the RPS or recorded on the NIAH. Proposed new stops/shelters in front of 10, 35, 85 and 121 St. Mobhi Road may impact on their setting. Furthermore, there will be changes to the entrance arrangements and a temporary land take to the south-east of Tower View Cottages, a group of late nineteenth century cottages.

**Architectural Conservation Areas and Conservation Areas and Z2 and Z8 lands**

- a) The proposed route will run proximate to Prospect/De Courcy Square ACA. Changes to the urban realm will impact on the character of the ACA, particularly the proposed provision of new bus stops and new bus shelters at existing bus stops. An existing bus stop at the entrance to the DeCourcy Square Architectural Conservation Area will be replaced and a signal controlled stop and small island constructed. The installation of new bus shelters at these locations will negatively impact on the character and settings of Architectural Conservation Area. The design of any new shelter in these locations should be carefully considered with the aim of minimising potential negative visual impacts, to support the reduction of clutter and to improve legibility of the Architectural Conservation Area.
- b) The proposed route will run through Phibsborough ACA. Changes to the urban realm will impact on the character of the ACA, particularly the proposed provision of new bus stops and new bus shelters at existing bus stops. The provision of bus shelters in close proximity to Protected Structure would negatively impact on the architectural character and setting of the ACA, including important vistas within the ACA. The location and design of new infrastructure, signage and bus stops/shelters shall be carefully considered with the aim of minimising potential negative visual impacts, to support the reduction of clutter and to improve legibility of the historic streetscapes and adjacent heritage structures of the ACA
- c) The proposed route runs along a section of St. Canice's Square Conservation Area at the junction of Church Street and Finglas Road.
- d) The route crosses the Conservation Area incorporating the Tolka River, extending into the north end of Glasnevin (Prospect) Cemetery Conservation Area.
- e) The proposed route runs along the eastern boundary of the Conservation Area at St. Canice's Square at the junction of Church Street and Finglas Road. The installation of a proposed new bus stop and small island is proposed on the Finglas Road at this location. The installation of new shelters or upgrades to existing shelters at this location would negatively impact their character and setting of the Conservation Area.
- f) The proposed route corridor passes through the red-hatch Conservation Area of the Royal Canal at the junction of Phibsborough Road and Prospect Road and along the canal bank to the east of Westmoreland Bridge. The proposed new bridge to the east of Westmoreland Bridge and associated ramped paths will impact on the Conservation Area. The location and design of new infrastructure and signage shall be carefully considered with the aim of

- minimising potential negative visual impacts, to support the reduction of clutter and to improve legibility of the Conservation Area.
- g) The proposed route will impact the red-hatch Broadstone Conservation Area on Constitution Hill. It is considered that the new park proposed to east of the boundary of the former Broadstone railway Station will have a positive impact on the Conservation Area.
  - h) The proposed route will run proximate to the Kings Inns and Henrietta Street red-hatch Conservation Area on Constitution Hill.
  - i) The proposed route will run proximate to the St Michan's Roman Catholic Church red-hatch Conservation Area.
  - j) The proposed route terminates within the Liffey Quays red-hatch Conservation Area.
  - k) The cumulative effect of additional signage and street furniture, together with proposed bus shelters/stops and changes to the urban realm may impact on the character of historic urban streetscapes of the red-hatch Conservation Areas and Z2/Z8 zoned lands. The location and design of new infrastructure, signage and bus stops/shelters shall be carefully considered with the aim of minimising potential negative visual impacts, to support the reduction of clutter and to improve legibility of the historic streetscapes and adjacent heritage structures of all Architectural Conservation Areas, Conservation Areas and Z2/Z8 lands.

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

**Lamp Posts:**

There is the potential for the cast iron lamp base (CBC0304LP001) at the junction of St. Mobhi Road and Griffith Avenue to be damaged during realignment of the adjacent kerbs. The supervision of the work by a conservation professional will be required. Exact details of the proposed relocation of the lamp standard shall be provided. It is noted that a c.1910 cast-iron lamp post base will be removed as part of the works and due to its poor condition, will not be relocated. This lamp post shall be recorded in advance of its removal to include photographic record. There is the potential for the lamp post box in its current location prior to its removal and the supervision of the work by a conservation professional will be required. Lamp posts which will be retained in position may require protection from potential impact during the construction phases of the project as they are located within the site boundary.

**Cobbles/Setts/Surfaces:**

The following streets Hammond's Lane; Chancery Street; May Lane, Constitution Hill (entrance to King's Inns); Phibsborough Road (various locations) are listed in Appendix 8 of the Dublin City Development Plan – the streets have granite kerbing. Historic kerbstones survive on Prospect Road on the eastern side of the railway bridge. It is not clear from the submitted documentation if these are to be retained. The Conservation Section recommends that these kerbstones be retained and integrated into the public realm works on the bridge. Historic kerbstones survive in sections along Royal Canal Bank, along Cuckoo Lane with granite bollards along the south side of the street, and to the front of Coleraine House and continuing along Coleraine Street. There is potential for damage to these historic items of street furniture as a result of construction works and they should be adequately protected.

#### **Other Street Furniture/Finishes:**

A stone boundary marker for ARANN QUAY WARD has been incorporated into the southwest pier at the entrance to Broadstone Park on North Circular Road. . There is potential for damage to this historic item of street furniture to be damaged as a result of construction works and it should be adequately protected.

#### **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. Refer to tree removal at Whitehall College of Further Education (RPS 7746), the Church of Our Lady of Victories (NIAH 50130121), and on the approach to Dean Swift Bridge (NIAH 50130053). A number of trees are proposed for removal opposite the main entrance and in the central median outside Glasnevin (Prospect) Cemetery. The loss of the existing tree line will have a direct impact on the setting of the Protected Structure.

The loss of a number of the mature trees that contribute positively to Broadstone Park is regrettable. It is recommended that new planting within the park be carefully considered, particularly its impact on the setting of Phibsborough Library (RPS 8884).

The removal of a line of established trees along the western side of Constitution Hill, opposite Kings Inns, will have an adverse impact on the setting of the adjacent Conservation Area and that of the Nationally important Protected Structure (RPS 3658 – Kings Inns and Registry of Deeds, including railings, boundary walls and gate piers).

#### **Boundary Treatments**

The Conservation Section notes that where works will require the removal of existing roadside boundary walls, railings, entrances gates and hedgerows, together with areas of existing garden plantings garden trees, paving and garden features, new boundary walls, railings, entrances gates and hedgerows to match existing shall be reinstated at setback location, pending agreement on more detailed design with the Planning Authority's Conservation Section and having regard to the provisions of the Architectural Heritage Protection Guidelines for Planning authorities (2011) and the relevant DHLGH Advice Series publication(s).

#### **Cycle Lanes**

The Conservation Section request that where the cycle ways are located in close proximity to Protected Structures and within Architectural Conservation Areas generally, that an alternative high quality cycle lane surface is provided in-lieu of red tarmacadam.

#### **Recommended Conditions**

These are set out in the Appendix below.

### **2.4.10 City Architects Department Comments**

#### **2.4.10.1 Introduction**

The City Architects Division welcomes in principal 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 the proposals for public realm upgrades include widened footpaths, and high quality hard and soft landscaping to contribute towards a safer, more attractive environment for pedestrians. The Scheme also notes 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.
- The General Arrangement Drawings submitted as part of the National Transport Authority's Ballymun / Finglas to City Centre Core Bus Corridor Scheme are drawn at a scale of 1:500@A1 and do not include an overlay of existing survey drawings. The inclusion of an overlay of existing survey drawings onto the General Arrangement Drawings as submitted for the Ballymun / Finglas to City Centre Core Bus Corridor Scheme would have facilitated a better assessment of the impacts of the proposals on the existing public realm.

#### **2.4.10.2 Previous commentary by the City Architects Division on the BusConnects Core Bus Corridor Scheme**

City Architects Division previously submitted detailed comments and recommendations on the BusConnects Core Bus Corridor Scheme to the Dublin City Council BusConnects Liaison Team on the following dates:

- 25th May 2019, City Architects comments on BusConnects CBC 'preferred routes', published for Round 1 of public consultation.
- 25th February 2020, City Architects Comments on BusConnects proposals, timelines, and information required.
- 18th April 2020, City Architects Comments on BusConnects CBC 'preferred routes', published for Round 2 of public consultation.
- 7th January 2021, City Architects Comments on BusConnects CBC 'preferred routes', published for 3rd Round of public consultation,

and in addition to the following studies:

- 5th August 2020, BusConnects Junction Study of 16 CBC routes.
- 5th August 2020, BusConnects CBC Civic Spine and Civic Space Study.
- 1st October 2020, Footpath Study of Routes 13 & 7.

### **3. Commentary by the City Architects Division on the BusConnects Ballymun / Finglas to City Centre Core Bus Corridor Scheme, as submitted by the National Transport Authority to An Bord Pleanála**

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

Volume 1, Non-technical Summary

Volume 2, Chapter 4 Proposed Scheme Description

Volume 3, Figures, Chapter 4.2 General Arrangement

Volume 3, Figures, Chapter 4.4 Typical Cross Sections

Volume 3, Figures, Chapter 4.5 Landscaping General Arrangements

Volume 3, Figures, Chapter 17.2 Photomontages

#### **Footpath widths:**

The provision of footpaths designed to the minimum width may not be sufficient in areas of high pedestrian traffic and in urban villages. Footpath widths also need to account for congregations of passengers waiting in the vicinity of bus stops.

There is concern that the proposed reduction in the existing footpath width along St Mobhi Road (Sheets 8-11) to accommodate the Proposed Scheme may be insufficient to accommodate the large volumes of pedestrian traffic and groups accessing the existing schools and sports club located along the road. Due to the constrained footpath widths, this pedestrian traffic may encroach onto the new cycletracks proposed along the Scheme.

#### **Local Public / Urban Realm Improvement Schemes:**

The Proposed Scheme includes drawings and images of proposed 'urban realm improvements' at;

- (a) Ballymun Road & St Mobhi Road (Sheet 8)
- (b) St Mobhi Drive & Tolka River towpath (Sheet 10 & 22)
- (c) Lindsay Road, at Harts Building (Sheet 12)
- (d) Whitworth Rd & Westmoreland Bridge Junction (Sheet 13)
- (e) Phibsborough Library & Royal Canal Bank / Blessington St Public Park (Sheet 14)
- (f) Constitution Hill New Garden Rest Area (Sheet 16)

- (g) Constitution Hill at Constitution Hill Flat Scheme (Sheet 16 & 17)
- (h) Botanic Road & Botanic Avenue (Sheet 22)
- (i) Finglas Road, small garden area. (Sheet 27)
- (j) Finglas Rd, entrance to Clearwater Shopping Centre (Sheet 29)

Public realm improvement works are welcome to these areas however, limited information is provided, and the drawing scale is insufficient to facilitate proper assessment of all of these proposals.

**Additional commentary on some of these proposed urban realm improvement schemes is provided below:**

**(d) Whitworth Rd & Westmoreland Bridge Junction (Sheet 13)**

The footpath outside the Bernard Shaw pub stretching from Whitworth Road and along Prospect Road as far as the junction with Lindsay Grove contains an extensive strip of existing tactile guidance paving. This tactile guidance strip is to facilitate visually impaired persons to access the headquarters and training centre of the National Council of the Blind of Ireland (NCBI) located on Whitworth Road.

The proposed provision of two-way cycle lanes in the footpaths to either side of the junction of Whitworth Road with Prospect Road / Westmoreland Bridge as part of the Proposed Scheme will negatively impact on the ability of visually impaired persons to access the NCBI.

Contact should be made with the NCBI to ensure that access to their facilities is not compromised by the proposals.

Sufficiently detailed drawings of the proposed new cycling bridge crossing the Royal Canal to the east of Westmoreland Bridge have also not been provided in the Scheme.

These are required in order to properly assess the impact of the proposed new bridge on the Royal Canal and its towpath, particularly as it appears that ground levels are to be modified as part of the proposals.

**(e) Phibsborough Library & Royal Canal Bank / Blessington St Public Park – (Sheet 14)**

A new underpass is proposed in the Scheme to facilitate pedestrians and cyclists to cross under North Circular Road. Access to this underpass will impact on the existing garden to the front of Phibsborough Library and the existing park at Royal Canal Bank and Blessington Street Park.

The impact of this proposed new underpass cannot be properly assessed as there is insufficient detail provided in the Scheme.

Drawings detailing the proposed levels, sections, elevations, depth of underpass structure etc. are required in order to fully assess the impact of the proposal on the garden, park and the historic library building, which is included in the National Inventory Architectural Heritage register of buildings.

Notwithstanding the lack of detailed information above, the City Architects Division does not support the provision of a new pedestrian and cycling underpass under the North Circular Road for numerous reasons, which include concerns for security.

**Comments regarding the Phibsborough Library:**



The following additional comments have been raised regarding the Library Garden by the Dublin City Council Architect advising on behalf of Dublin City Libraries:

The Phibsborough Library site is on the National Inventory of Architectural Heritage (NUIAH registration no 50060231).

It is noted that the existing main access route from North Circular Road and through the Library Garden to the entrance of the library building, is to be removed under the Proposed Scheme. No alternative main access route is indicated in the Landscape Drawing (Sheet 14) or General Arrangement Drawing (Sheet 14).

Dublin City Libraries have proposals to improve access for people with disabilities, by using the Library Garden to provide ramped access to current building standards from North Circular Road down to the library building. The acquisition of the library's lands for the proposed new underpass and public park will prevent this proposal from being carried out and rule out any future accessibility works.

It is noted that the route from the underpass to Eglinton Terrace/Royal Canal Bank could be realigned to minimise the impact on the Library Garden.

Dublin City Libraries have plans to extend the building to improve the library service and comply with modern building regulations. As the library does not have sufficient land to the rear of the existing building to accommodate the proposed extension, plans to improve the library service may focus on the Library Garden to the front of the site. The acquisition of the library's lands for the proposed new underpass and public park will prevent this proposal from being realised. There is also concern regarding the future maintenance of the landscaped areas to the front of the library that would no longer be within the control of Dublin City Libraries. The lack of this space would also severely impact outdoor library events, plans for Age Friendly seating and a sensory garden.

There is insufficient detail provided to assess how the railings surrounding the existing Library Garden will be affected and what the proposed delineation between the Library Garden and the public park will be.

The library is currently open until 8pm two evenings a week, there is insufficient information provided to assess safety and security risks that may result from the proposal.

In conclusion, the Dublin City Council Architect advising on behalf of Dublin City Libraries, does not support the proposals to the Library Garden as currently described in the submitted documentation.

**g) Constitution Hill at Constitution Hill Flat Scheme (Sheet 16 &17)**

The following comments have been raised by the Dublin City Council Architect charged with developing the Constitution Hill Flat Scheme, on behalf of the Housing & Community Services Division of Dublin City Council:

The existing mature lime trees along the site at Constitution Hill currently serve as an acoustic buffer and visual screen to the Constitution Hill Flat Scheme.

The Proposed Scheme proposes to remove 23 of these trees along Constitution Hill, and to retain seven. 26 new silver birch trees are proposed in lieu along the site as part of the Proposed Scheme.

These new silver birch tree species differ in character and size from the existing lime trees and will provide a less dense tree canopy when fully mature. This will effectively reduce the acoustic and visual screen currently afforded to the Constitution Hill Flat Scheme.

In addition, it is noted that the existing trees also provide a visual screen to the Kings Inns Buildings located on the opposite side of Constitution Hill. These buildings are significant protected structures whose setting is enhanced by the dense green enclosure created by the existing lime trees.

The photomontages presented (17.2 Photomontages: Sheet 20, Figure 17.2.1.20) as part of the Proposed Scheme do not accurately reflect the impact of the proposed development.

The image indicates the removal of one tree trunk only from the existing tree canopy. The new replacement tree formation, tree canopy and change of tree species is not reflected in the imagery. As such the full impact of the proposal is not accurately represented in the photomontage.

The General Arrangement drawings (Sheet 16 & 17) do not reflect the extent of tree replacement proposed in the Landscaping drawings. New trees and proposed trees are represented with the same symbol, hence it is difficult to ascertain the full impact of the proposals.

In conclusion, the Dublin City Council Architect charged with developing the Constitution Hill Flat Scheme on behalf of the Housing & Community Services Division of Dublin City Council considers that the Proposed Scheme should be reconfigured to facilitate the retention of the existing lime trees on the site.

#### **Land Acquisition by NTA & Taking in Charge:**

Where it is proposed to CPO or acquire lands as part of the Proposed Scheme, confirmation is sought as to whether ownership of these lands will be transferred to the relevant local authority or will these lands be retained by the NTA but taken in charge by the relevant local authority for maintenance purposes.

#### **Bus Shelter Design:**

Bus shelters impact on the width of footpaths and should only be proposed where there is sufficient space to physically accommodate them and passengers congregating in their vicinity.

Bus shelter locations are indicated on the drawings but information on their proposed design, size and type is not provided.

The proposed location of new bus shelters in the vicinity of buildings of architectural importance, in Conservation Areas (for example at St Michan's Church – Sheet 18), in Architectural Conservation Areas (ACA's), and Special Planning Control Schemes (SPCS) needs to be considered carefully considered.

In the interest of visual amenity and having regard to protected structures and their settings, advertisements should preferably not be permitted on bus shelters in Architectural Conservation Areas (ACA) 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.

This issue has been a significant problem on previous transport infrastructure projects.

**Palette of materials:**

It is submitted that the replacement of areas of existing hard landscape surfaces with new may not be required, nor may it be financially feasible or sustainable.

It is noted that the 'Typical Material Typologies' in Section 4.6.12.2.1, of Volume 2, Chapter 4 Proposed Scheme Description, do not appear to include or refer to existing historic fabric such as historic granite paving and historic granite kerbs within the Proposed Scheme. No reference is made either in Volume 3, Figures, Chapter 4.5 Landscaping General Arrangement drawings.

**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.

**Greening:**

The legend on the General Arrangement drawings indicates existing and proposed trees with the same symbol. The tree planting strategy for the scheme is therefore unclear.

**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.

**Per cent for Art Strategy:**

It is not clear where the Percent for Art Strategy is to be incorporated into this project.

**Water Drinking Fountains:**

In order to reduce plastic waste and promote sustainability, a strategy for the roll-out of water drinking fountains, such as the recently installed model on Clarendon Row, Dublin 2, should be incorporated into the Proposed Scheme at suitable locations and in consultation with Dublin City Council.

**Side Road Entry Treatment:**

The provision of raised tables at junctions to side streets/ roads provides an improved public realm environment for pedestrians and mobility impaired persons to cross the streets. Raised tables are indicated in the General Arrangement drawings to most side streets/ roads but not to others, particularly. It is unclear why they have been omitted in these instances.

### **Integration of the materials palette of the Proposed Scheme with existing private landing areas and recently upgraded areas of the public footpath:**

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.

### **Village Signage:**

Existing 'Welcome to Phibsborough Village' signage provide local wayfinding landmarks and should be retained as part of the Proposed Scheme, in agreement with the local authority and community e.g "Welcome to Phibsborough" sign (Sheet 13).

The Proposed Scheme presents an opportunity to implement a scheme of city wide co-ordinated village signage, in collaboration with the relevant local authority and Area Offices, as part of the overall Bus Connects Core Bus Corridor Project.

### **2.4.11 Housing and Community Services Departments Comments**

Dublin City Council's Housing & Community Services Department wish to make an observation on the temporary CPO issued by Bus Connects for a temporary construction compound on our housing site at Constitution Hill, Catherine Lane North Junction, Dublin 7. It contended that the proposed construction compound is not compatible with this Department's housing delivery plans for the site.

The primary concern is that the location identified for the proposed construction compound will have a significant effect on the delivery of the Constitution Hill regeneration project. This project is a priority project under the City Council's Housing for All action plan. It will deliver 49 homes in 2025 & 76 homes in 2027. The redevelopment plans are at an advanced stage and a Part 8 planning application is due to be lodged in the coming weeks. Upon receipt of Part 8 planning permission, this will be progressed to procuring a contractor to enable this Department to meet its target onsite date of Q4 2023.

DCC has secured 100% funding for the housing project from the Department of Housing, Local Government & Heritage (DHLGH). The project entails the deep retrofit and expansion of the existing three housing blocks, the construction of two new housing blocks, one to the north of the site and one to the south of the site, along with mews houses to the rear of the site. One of the criteria for achieving DHLGH funding is the ability to provide for additionality in the number of homes the new scheme will provide. The current scheme provides 89 homes, whereas the new scheme will provide 124 homes.

This Department is progressing an aggressive timeline to ensure the programme milestones are met for housing delivery. The Part 8 process was initiated and noted by the local councillors at the Central Area Committee meeting in June 2022 and the pre-Part 8 planners report has been received to enable the commencement of the Part 8 application.

The redevelopment project has a number of complexities, which adds to the concerns on the proposed location of the construction compound within this housing site. This project is due to be delivered in two phases and this has had a massive impact on all project decisions to date. Also adding to the complexity of the project is the fact that at every phase of construction, the site will be occupied by

residents. These matters have added increased burdens on the project and to try mitigate against them and to ensure the project proceeds, there has been extensive consultation over the last 24 months with the residents of Constitution Hill to keep them informed of proposals and to gain their approval.

**Other issues that need to be taken into account when considering the suitability of the proposed location of the construction compound are the following:**

- The planning proposal for this new housing scheme shows a new housing block to be constructed on the part of the site, which is the same location that has been identified by Bus Connects for the construction compound. Any delay in having this site available will have a very distressing effect on the housing delivery targets. The current programme allows commencement on this part of the site in late Q2 2025. Any risk to this date needs to be mitigated against.
- The proposed location of the construction compound will have a considerable effect on the residents living in Constitution Hill as the City Council are cognisant that they will already be living beside a construction site for the duration of the redevelopment project. In order for Phase 1 to proceed, it has been agreed with the residents and Area Housing Management that there will be a complete division of the site during the construction phases. From Q4 2023, all vehicular and pedestrian access for residents and visitors to the Constitution Hill estate will be from St Catherine's lane. The northern site entrance which is currently the entrance used by residents, will be exclusively for construction traffic and there will be no through passage. The location of the construction compound on this site may complicate this traffic management plan and add unforeseen pressures.
- A further complication to the proposed location of the construction compound is that in this Department's consultation with the residents and the Area Housing Manager, it was agreed to relocate the ball area and open space provisions for residents during Phase 1 construction to the same location proposed for the temporary construction compound.
- To conclude, it is requested that the proposed location for this Bus Connects construction compound to be reviewed against DCC's advancing redevelopment plans for the housing site. The compatibility of locating the construction compound on the housing site while the site undergoes massive redevelopment is not realistic and feasible due to the significant risk it would place on our housing delivery plans for this strategic housing site. Consequently, this temporary compound plot should be removed from this housing site in the proposed CPO.

#### **2.4.12 Parks Department Comments**

##### **GA Plans and Landscape Plans**

1. The Plans issued to ABP are at a Scale of 1:500. It is very difficult to read these plans in particular their impact on existing footways and soft landscape areas; as a result these comments need to be viewed within that context. It's worth noting the recent court case where the NTA we required to issue the CAD plans for review. This is something which this department had requested previously for all routes, this request was not accommodated by the NTA.
2. There are no dimensions and no sections with before and after levels etc.

3. There is a real shortage of detail on the plans including a lack of clarity where footways and kerbs are reduced, no street lighting or signage is shown on the GA or Landscape Plans, therefore there is no knowledge of service runs, utility cabinets or other street fixings which would impact on pedestrian comfort, safety and ability to install green infrastructure.
4. It is difficult to verify but it appears that the footways in some locations have been reduced in width, without the street furniture and utilities indicated it is unclear if there are impacts to pedestrian safety and comfort, in particular at Glasnevin Cemetery.
5. It is unclear why there is a raised table and not just a continuation of the footway along Church Street at the interface with Church Terrace & Church Avenue West (the raised table just interfaces with bollards for vehicles) and possibly at New Street North and Stirrup Lane subject to agreement to access only from Beresford Street.
7. 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. No detail is provided as to what standard and quality of tree pit will be provided.
8. This department requests that all soft landscape proposals are agreed with the department prior to detail design. Some of the species suggested and located are incompatible with adjacent planting e.g. Constitution Hill replacement planting of Betula in front of Tilia in a narrow space. Figure 17.2.1.20 in the photomontages is incorrect as it fails to show the Betula planting.
9. In some locations street tree planting is proposed but yet the plans also indicate that the existing surface is retained, it would appear impossible to create the necessary tree pit with 15 cu.m of soil while retaining the existing surface.
10. It would appear that the trees indicated to be retained on St Mobhi Road and other locations maybe impossible to be retained as the pavement treatment plans indicate proposed footpath build up, this will likely compromise the roots of the mature trees. This is evident not only on the plans but also on the photomontages for the road.
11. We recommend an Arborist and Landscape Architect be conditioned to be present on site for the duration of the works to ensure trees indicated for retention are retained and proposed soft landscape is successfully delivered.
12. We recommend that a Tree Bond be agreed with DCC Parks Landscape and Biodiversity Section for each proposed retained tree
13. The surface treatment plans do not align with the Landscape and GA drawings.
14. As a general note Tree planting species should be planted at a minimum of 16-18cm girth with a minimum of 3 years post practical completion maintenance to ensure healthy establishment. Much of the proposed tree planting will need to be installed in constructed tree pits of which details should be agreed with this department.
15. Parks and Landscape Division have major concerns about the underpass at Phibsborough Library, the proposal will destroy the heart of the park including mature trees. The wider area has a large volume of temporary accommodation along with the social problems which come with that. This proposal of an underpass in this location will likely create an area for anti social behaviour. There is

no natural surveillance and therefore it is unlikely this area will be suitable for users during times of darkness or quite days including dawn and dusk in winter time. It's clearly the incorrect location for a commuter cycle route. In addition the cycle path does not connect the most important location in the area Phibsborough village with the shops and community amenities, four lanes of bus and car traffic are maintained at the expenses of the cyclist.

16. The cycle lane on Sr Mobhi Drive which takes over the pedestrian zone is not supported. The cyclist will be brought into an amenity location where conflict with pedestrians may take place. The redesign of St Mobhi Drive should be considered to slow traffic and allow safer cycle use on road way.

17. There is no detail of the proposed SUDS measure however some indicated under existing mature trees are not viable.

#### Landscape and Visual Impact Assessment

1. Photomontage 17.2.10 does not include the proposed tree planting as indicated on the Landscape GA

2. Photomontage 17.2.12 does not include the proposed tree planting as indicated on the Landscape GA

3. It appears that it would not be possible to retain the trees on St Mobhi road based on plans and visuals 17.2.14. The roots will be compromised with the build up of the footway, in addition the SUDS measure does not appear to be shown and there is one tree in the montage which is removed on the Landscape GA. The photomontage also shows proposed planting in the Na Fianna site but none is indicated on the plans, it is also unclear if that would be possible without compromising the playing area of the pitch.

4. Photomontage 17.2.20 does not include the proposed tree planting as indicated on the Landscape GA (Betula) or all the proposed removed trees.

5. A tree has been added to the photomontage 17.2.30 next to the bus stop at St Vincent's Secondary school which is not on the plans.

6. The findings in the LVIA would need to be questioned if the conclusions are based on these visuals.

#### 2.5 Conclusion

The proposed Ballymun-Finglas to City Centre Core Bus Corridor Scheme is supported and welcomed by Dublin City Council as it will ensure the delivery of a number of key policies and objectives of the Dublin City Development Plan 2016-2022 as well as the forthcoming Dublin City Development Plan 2022-2028. The development of the Core Bus Corridor Scheme will provide an upgraded and expanded bus network and quality of service together with better quality cycling and pedestrian facilities. These improvements will make it easier for people to access and use public transport. In turn, this will promote modal shift from the private car to more sustainable forms of transport including walking, cycling and public transport, ultimately contributing to the creation of a greener and more sustainable city.

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



## APPENDIX 1

### Recommendations/Conditions

#### Dublin City Council and the National Transport Authority

1. That a comprehensive agreement is put in place between Dublin City Council 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 Dublin City Council following construction.
2. Following handback, a separate agreement shall be put in place between Dublin City Council 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 Dublin City Council departments involved with the development of the Scheme shall be consulted during the detailed design development process for the Scheme and the NTA shall incorporate the requirements of the Dublin City Council departments into the final detailed design of the Scheme.

#### Planning Department Conditions

1. A landscape proposal shall be prepared following the site works for Construction Compound B1 at Santry Cross.

#### Environment and Transport Department Recommendations/Conditions

##### Traffic Division

1. All the traffic management equipment that is necessary for the safe and efficient operation of this Public Transport corridor, including all traffic signal equipment, shall be to the relevant Dublin City Council specification and only the relevant Dublin City Council 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:

1. 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.
2. Drawings distinguishing between antique granite footways and kerbs and new granite footways and kerbs shall be submitted as part of detailed design development of approved scheme.
3. Drawings clearly demarcating private landings shall submitted as part of detailed design development of approved scheme.

#### Design:

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

9. Alterations to kerbside spaces such as pay and display scheme/loading/line markings/signage pole shall be agreed with the Planning Authority to ensure adequate loading and set down is provided.
10. All signage and road markings to comply with the Traffic Signs Manual.

Reinstatement:

1. 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.
2. 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.
3. 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.
4. Samples of all new natural stone kerbs, flags and setts to be used in reinstatement works shall be supplied to DCC for agreement prior to use.

Construction Period:

1. 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.
2. In cases of reinstatement of areas where the roadway or footway is not being reconstructed in full (e.g. trench for utility along side street) the NTA or their Contractor shall pay DCC long term damages charges as set out in the current edition of Dublin City Council's Directive for the Control and Management of Roadworks in Dublin City.
3. 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.
4. 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.
5. 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

1. 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 as well as existing heritage and high value lighting Columns. .

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

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

### Temporary Lighting

1. 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 lit 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](http://www.dublincity.ie) Forms and Downloads). In particular:
  - Continuous Kerbs incorporating drainage, as outlined in Figure 2, Page 3 in Appendix K Drainage Design Basis Document, are not accepted by DCC Drainage Planning, Policy and Development Control.
  - Enclosed drainage channels such as slot drains or "ACO" drains are not accepted by Drainage Planning, Policy and Development Control.
  - The hybrid gully outlined in Section 1.1.3, Page 4 in the BusConnects - Road run-off collection gullies Technical Paper is not accepted by DCC Drainage Planning, Policy and Development Control. The use of narrow profile gullies as previously agreed is welcome.

2. The development shall incorporate Sustainable Drainage Systems in the management of surface water, providing an integrated approach with the landscaping proposals. Full details of these shall be agreed in writing with DCC Drainage Planning, Policy and Development Control prior to commencement of construction. Soft landscaping should be considered before hard landscaping. The SuDS design should refer to the new Dublin City Council Sustainable Drainage Design and Evaluation Guide published in 2021.
3. The detailed drainage design shall be agreed in writing with DCC Drainage Planning, Policy and Development Control prior to commencement of construction. Surveys on the location and condition of surface water infrastructure sewers, both pre and post development, shall be carried out by the developer and any damage rectified. Any diversions shall be agreed in writing, prior to commencement, with Drainage Planning, Policy and Development Control. To avoid multiple connections to combined sewers a separate surface water network should be constructed. 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 Ballymun Finglas to City Centre CBC proposal should not cause a deterioration of the status of any waterbody to which it is contiguous with downstream (specifically the Lower Liffey Estuary) and furthermore should support the attainment of good ecological and good surface water chemical status for the River Tolka. This should not cause a deterioration of the status of any waterbody to which it is contiguous with downstream and furthermore should support the attainment of good ecological and good surface water chemical status, in accordance with DCC and national obligations. NTA shall provide an evidence-based assessment of the impact, if any, of the proposed scheme on the water quality status of rivers within the curtilage of the proposed project, including both ecological and chemical status.
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.
8. As-built drawings of all drainage networks and SuDS measures shall be provided by the NTA on completion of the works.

## Recommendations/Conditions – Air and Noise Pollution Control Unit

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

## Archaeology

### Recommended conditions

1. The NTA shall assign a Project Archaeologist to oversee the archaeological elements of the project from inception to completion.
2. Ensure that the Project Archaeologist will be a member of the project team. As part of the project team the Project Archaeologist will manage archaeological aspects of the project and input on, inter alia:
  - project planning and design,
  - scheduling of archaeological mitigation,
  - the development of programmes,
  - the development of construction and procurement strategies,
  - the preparation of contract documentation,
  - the appointment of competent Consultant Archaeologists,
  - advance works, construction and potential operational issues.
3. Require that the process of identifying the potential impact the project on archaeology will be dealt with by a competent archaeologist. The Project Archaeologist shall oversee the archaeological operations carried out by the contractor's archaeological consultant.
4. Ensure that appropriate investigation is carried out, where reasonably practicable, prior to the commencement of construction to identify both the known and unknown archaeology that may be impacted by the project. Where this is not reasonably practicable, an appropriate archaeological strategy to mitigate the known or potential archaeological impacts to be developed in consultation with the Minister.
5. Consider whether the archaeology can be preserved in situ within the confines of the project. Where preservation in situ cannot reasonably be achieved, allow sufficient time to preserve by record all archaeological remains that are impacted by the project to a level that is acceptable to the Minister.
6. Provide the necessary funding to fulfil the post-excavation and reporting requirement(s) of the project to a standard that is acceptable to the Minister.
7. Publish and/or disseminate, as appropriate, the archaeological results of the project.
8. The NTAs Project Archaeologist to copy Dublin City Council Archaeology Section with Method Statements and reports and provide the Archaeology Section of Dublin City Council with regular communications on finds and mitigation throughout the delivery of the scheme through to completion.

9. The primary archaeological paper archive for all archaeological site investigations to be prepared and deposited with the Dublin City Archaeological Archives within a timeframe to be agreed with the planning authority.

## **Conservation**

### Recommendations/Conditions

1. To safeguard the special architectural interest of affected Architectural Heritage across the Bus Connects routes - including Protected Structures and Conservation Areas, landscaping, historic paving, setts, kerbing and associated features, boundary treatments, historic street furniture, gardens and trees and historic public realm etc. - and to ensure that the proposed repair works will be carried out in accordance with best conservation practice with no unauthorised or unnecessary damage or loss of historic fabric, the Conservation Section recommend that all works shall be designed and supervised by an expert in architectural conservation in accordance with the provisions (outlined above) of the Dublin City Development Plan 2016-2022, the forthcoming City Development Plan 2022-2028, the *Architectural Heritage Protection Guidelines for Planning Authorities (2011)* and relevant documents of the DHLGH Advice Series.
2. The conservation professional shall ensure adequate protection of the retained and historic fabric during the proposed works and across all preparatory and construction phases. In this regard, all works shall be designed to cause minimum interference to historic fabric.
3. In accordance with best conservation practice, specifications and method statements for the careful and sensitive relocation and reinstatement of historic fabric identified in the report above, and in particular to Protected Structures, sites/structures on the NIAH and DCIHR, and structures and features in Architectural Conservation Areas (ACAs) across the Bus Connects route shall be submitted by the conservation professional for the written approval of the Planning Authority.
4. The conservation professional shall advise the Conservation Section on architectural heritage and conservation matters that may have further impacts on the project throughout the construction phases.
5. If, through the course of construction work across the Bus Connects routes, hitherto unknown and concealed architectural heritage fabric is found, the conservation professional shall contact the Conservation Section to advise them of the discovery as the presence of historic fabric may inform an alternative strategy for a design proposal that would enhance the setting of a Protected Structure, other historic buildings and features, an Architectural Conservation Area or Conservation Area.
6. All works shall be carried out in accordance with best conservation practice, the Architectural Heritage Protection Guidelines for Planning Authorities (2011) and the Advice Series issued by the Department of the Housing, Local Government and Heritage. All repair works shall retain the maximum amount of surviving historic fabric in situ. Items to be removed for repair off-

- site shall be recorded prior to removal, catalogued and numbered to allow for authentic reinstatement.
7. All existing original architectural heritage features, in the vicinity of the works shall be protected during the course of all phases of construction works.
  8. All repair of historic fabric shall be scheduled and carried out by appropriately experienced conservators of historic fabric.
  9. The Conservation Section recommends the following specific measures:
    - a) Consideration should be given to the rationalisation of all signage across the route to reduce visual clutter.
    - b) Where cycle ways are located in close proximity to Protected Structures and within Architectural Conservation Areas generally, consideration shall be given to an alternative high quality cycle lane surface in-lieu of red tarmacadam.
    - c) Carefully considered method statements shall be provided for the protection of the existing granite gate piers and gate screen at Whitehall College of Further Education (RPS 7746). The sympathetic reinstatement of the associated boundary railings to St Mobhi Road shall be on a like-for-like manner.
    - d) Compensatory tree planting shall be provided at Whitehall College of Further Education (RPS 7746), to replace those that shall be removed as part of the temporary land acquisition.
    - e) The design of the new bridge to the east of Westmoreland Bridge, crossing the Royal Canal, combined with the slope of the cycle path up to it represent a significant intervention to the landscape of the Royal Canal in this location. The Conservation Section recommends that any bridge proposed in this area is carefully considered to ensure the setting of the Regionally rated bridge is not further eroded and negatively impacted.
    - f) The proposed underpass crossing beneath North Circular Road should be of the highest architectural quality to ensure the setting of the Protected Structure of Phibsborough Library and Broadstone Park are not adversely impacted. The impact on surviving remnants of the canal and the historic bridge (Blaquiere Bridge) are to be determined and proposed works in this location should include some recognition of the historic layout of this area. It is recommended that the historic railings be retained to ensure the setting of the Protected Structure is safeguarded.

#### **City Architects Recommended Conditions**

##### **Footpath widths:**

By condition, confirmation is requested that pedestrian traffic counts have been undertaken to ensure that the proposed footpath widths along the Proposed Scheme are sufficient to cater for anticipated pedestrian volumes. This confirmation should be submitted to the planning authority prior to commencement of development.

##### **Local Public / Urban Realm Improvement Schemes:**



By condition, detailed drawings and specifications of the proposed urban realm improvement schemes at the locations identified above shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Land Acquisition by NTA & Taking in Charge:

By condition details of all landscaping and public realm finishes in areas where they are to be taken in charge shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Bus Shelter Design:

By condition, 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.

Siting of utility cabinets and above-ground utility infrastructure:

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

On-street Parking:

By condition, the NTA should engage with electrical charging operators to co-ordinate the roll out of electrical charging points to on-street parking areas as part of the works along the route of the Proposed Scheme. This shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Palette of street furniture:

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

Boundary treatments:

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

Per cent for Art Strategy:

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

Side Road Entry Treatment:

By condition, raised tables should be provided insofar as possible at junctions to side streets/ roads along the route of the Proposed Scheme while having regard to Road Safety and Access Audits etc. This shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

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

By condition, 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.

Village Signage:

By condition, 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 Division Recommended Conditions**

1. Agreement on taking in charge of landscape components of the proposals by DCC Park Services will require liaison and agreement on planting details prior to implementation. Amendments to planting proposals may be required to comply with Park Services contract maintenance requirements.
2. All landscape components of the proposals will require contract maintenance for a minimum of 3 years following completion of the works or any phases. Landscape areas agreed to be taken in charge will require full completion of the 3 year maintenance period and rectification of any defects or loss of planting.
3. All soft landscape proposals to be agreed with the Parks Department prior to detail design (Note: Some of the species suggested and located are incompatible with adjacent planting e.g. Constitution Hill replacement planting of Betuala in front of Tilia in a narrow space. Figure 17.2.1.20 in the photomontages appears incorrect as it fails to show the Betuala planting.)
4. An Arborist and Landscape Architect shall be present on site for the duration of the works to ensure trees indicated for retention are retained and proposed soft landscape is successfully delivered.
5. A Tree Bond to be agreed with DCC Parks Landscape and Biodiversity Section.
6. Tree planting species should be planted at a minimum of 16-18cm girth with a minimum of 3 years post practical completion maintenance to ensure healthy establishment. Details of constructed tree pits shall be agreed with the Parks Department.
7. The implementation of the arboricultural and landscape proposals will require the professional input of Arboriculturists and Landscape Architects for the full duration of project work contracts. Construction details for components of the project that will be taken in charge shall be agreed at design stage with Park Services.
8. 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.



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Richard Shakespeare  
Assistant Chief Executive  
Dublin City Council

