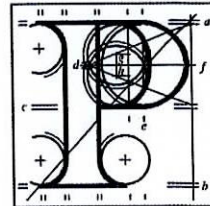


**Our Case Number: ABP-316828-23**



**An  
Bord  
Pleanála**

South Dublin County Council  
Development Management & Enforcement  
County Hall  
Tallaght  
Dublin 24

**Date:** 19 July 2023

**Re:** Tallaght/Clondalkin to City Centre BusConnect Core Bus Corridor Scheme.  
Tallaght/Clondalkin to Dublin City.

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.

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

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

Yours faithfully,

Niamh Thornton  
Executive Officer  
Direct Line: 01-8737247

HA03

<b>Tel</b>	<b>Tel</b>	(01) 858 8100
<b>Glaó Áitiúil</b>	<b>LoCall</b>	1800 275 175
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

## Niamh Thornton

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**From:** LAPS  
**Sent:** Wednesday 5 July 2023 09:51  
**To:** Niamh Thornton  
**Subject:** FW: South Dublin County Council Submission - Bus Connects - Tallaght and Clondalkin to City Centre Core Bus Corridor Scheme (Submission deadline 4 July 2023)  
**Attachments:** South Dublin County Council Submission on Bus Connects-Tallaght-Clondalkin Route 04 July 2023 CLEAN.docx

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**From:** SIDS <[sids@pleanala.ie](mailto:sids@pleanala.ie)>  
**Sent:** Wednesday, July 5, 2023 8:25 AM  
**To:** LAPS <[laps@pleanala.ie](mailto:laps@pleanala.ie)>  
**Subject:** FW: South Dublin County Council Submission - Bus Connects - Tallaght and Clondalkin to City Centre Core Bus Corridor Scheme (Submission deadline 4 July 2023)

---

**From:** Gormla O'Corrain <[gocorrain@SDUBLINCOCO.ie](mailto:gocorrain@SDUBLINCOCO.ie)>  
**Sent:** Tuesday, July 4, 2023 5:09 PM  
**To:** [n.thornten@pleanala.ie](mailto:n.thornten@pleanala.ie); Shaun McGee <[S.McGee@pleanala.ie](mailto:S.McGee@pleanala.ie)>; Christine Brennan <[c.brennan@pleanala.ie](mailto:c.brennan@pleanala.ie)>; SIDS <[sids@pleanala.ie](mailto:sids@pleanala.ie)>  
**Subject:** South Dublin County Council Submission - Bus Connects - Tallaght and Clondalkin to City Centre Core Bus Corridor Scheme (Submission deadline 4 July 2023)

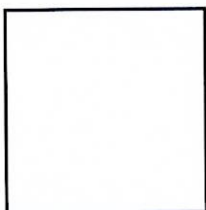
A Chara,

Please find attached South Dublin County Council's Submission in relation to the Bus Connects - Tallaght and Clondalkin Core Bus Corridor Scheme for consideration. Please acknowledge receipt of same.

Is mise le meas  
Gormla O'Corrain

Gormla O'Corrain  
Senior Planner  
Development Management & Enforcement  
South Dublin County Council

Email: [gocorrain@sdcc.ie](mailto:gocorrain@sdcc.ie)  
[www.sdcc.ie](http://www.sdcc.ie)



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Is eolas faoi rún an t-eolas atá sa ríomhphost seo agus d'fhéadfadh go mbeadh sé faoi phribhléid ó thaobh an dlí de. Is don té ar seoladh chuige/chuici agus dósan/dise amháin an t-eolas. Ní ceadmhach do dhuine ar bith eile rochtain a bheith aige/aici ar an ríomhphost seo. Murar duit an ríomhphost seo tá nochtadh, cóipeáil, dáileadh ná aon ghníomh eile a dhéanamh nó aon ghníomh eile a fhágáil gan déanamh ar iontaoibh an ríomhphoist seo toirmisceithe ort agus d'fhéadfadh siad sin a bheith neamhdhleathach. Má fuair tú an teachtaireacht leictreonach seo trí earráid téigh i dteagmháil, le do thoil, leis an té a sheol í nó le [info@sdublincoco.ie](mailto:info@sdublincoco.ie). Glanadh an teachtaireacht seo le bogearraí Frithvíreas.

# South Dublin County Council Submission on Bus Connects

Tallaght/Clondalkin to City Centre Core Bus  
Corridor Scheme.

Land-Use Planning and Transportation Department  
July 2023

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# Introduction

The National Transport Authority (NTA) have submitted a planning application to An Bord Pleanála for the **Tallaght/Clondalkin to City Centre Core Bus Corridor Scheme**.

The documents submitted with this application include:

Proposed Design Drawings and supporting and statutory documentation which include:

- Environmental Impact Assessment Report
- Natura Impact Statement

**In this report, South Dublin County Council (SDCC) will be making a formal submission to An Bord Pleanála as part of this consultation process. As specified on public notices, the proposed scheme will comprise the following;**

*“The construction of the Tallaght / Clondalkin to City Centre Core Bus Corridor Scheme, which has an overall length of approximately 15.5km from end to end with an additional offline cycling facility approximately 3.9km in length consisting of two sections, namely the Tallaght to City Centre section and the Clondalkin to Drimnagh section.*

*The Tallaght to City Centre section is routed along Belgard Square West, Belgard Square North, Belgard Square East, Blessington Road, Main Road, Old Greenhills Road to the junction of Greenhills Road and Bancroft Park. From here the Proposed Scheme is routed along the R819 Greenhills Road to Walkinstown Roundabout via new link roads; in the green area to the east of Birchview Avenue/Treepark Road; in the green area to the south of Ballymount Avenue, and in the green area to the east of Calmount Road.*

*From Walkinstown Roundabout the main Core Bus Corridor is routed along the R819 Walkinstown Road to the junction with R110 Long Mile Road and Drimnagh Road. The Clondalkin to Drimnagh section commences at this junction and the Proposed Scheme is routed along the R110 to the junction of Dean Street and Patrick Street via Drimnagh Road, Crumlin Road, Dolphins Barn, Cork Street, St Luke’s Avenue and Dean St. From here the Proposed Scheme is routed along the R137 via Patrick Street to the junction at Winetavern Street and Christchurch Place where the Proposed Scheme terminates within the City Centre.*

*The Clondalkin to Drimnagh section is routed along the R134 New Nangor Road, R810 Naas Road, R112 Walkinstown Avenue and the R110 Long Mile Road to the junction of Walkinstown Road and Drimnagh Road, where it will join the Tallaght to City Centre section of the Proposed Scheme.*

*The Proposed Scheme includes an offline cycle facility between Walkinstown Roundabout and Parnell Road (Grand Canal) which provides a more direct route towards the city via Bunting Road, Kildare Road and Clogher Road, all in the County of Dublin and within the South Dublin County Council (SDCC) and Dublin City Council (DCC) administrative areas... ”*

An overview of the Proposed Scheme is presented in Figure 1 below.

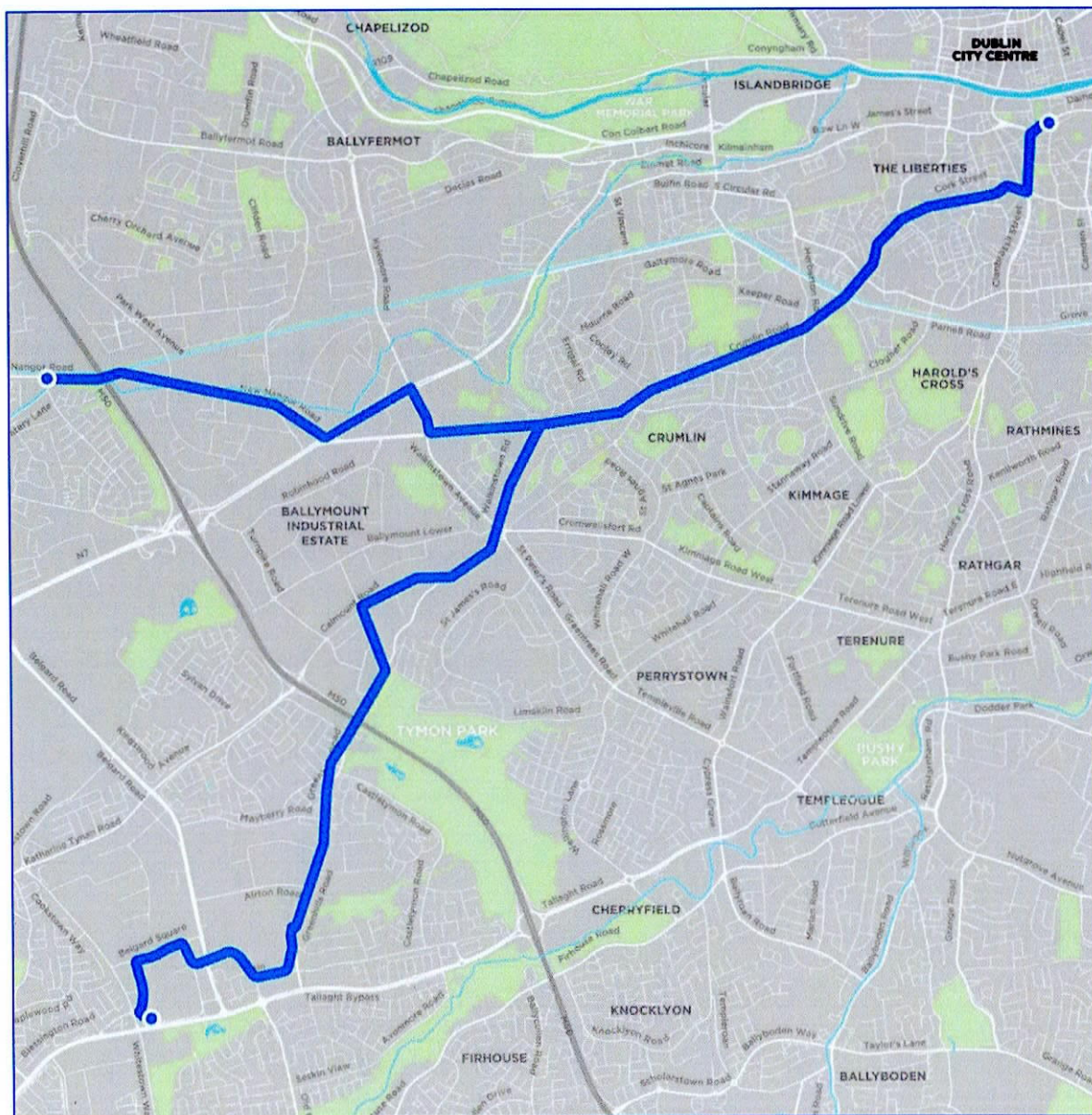


Figure 1 Overview of Proposed Scheme (source: <https://tallaghtclondalkinscheme.ie/>)

## SDCC Development Management Section

The South Dublin County Development Plan 2022-2028 is generally in favour of the principle of the proposed scheme, with a supportive policy context as outlined below:

### South Dublin County Council County Development Plan 2022-2028 - Policy Context

#### Policy SM1:

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

#### SM1 Objective 1:

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

**SM1 Objective 3:**

To support the delivery of key sustainable transport projects including DART and Luas expansion programmes, BusConnects and the Greater Dublin Metropolitan Cycle Network in accordance with RPO 5.2 of the RSES / MASP.

**SM1 Objective 4:**

To ensure that future development is planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe and attractive street environment for pedestrians and cyclists, in accordance with RPO 5.3 of the RSES / MASP.

**Policy SM3: Public Transport**

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

**SM3 Objective 1:**

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

**SM3 Objective 3:**

To ensure that future development is planned in such a manner as to facilitate a significant shift to public transport use through pursuing compact growth policies, consolidating development around existing and planned public transport routes and interchanges, and maximising access to existing and planned public transport services throughout the network.

**SM3 Objective 4:**

To optimise accessibility to public transport, increase catchment and maximise permeability through the creation of new and upgrading of existing walking and cycling routes linking to public transport stops.

**Policy SM3: Public Transport – Bus**

**SM3 Objective 11:**

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

**SM3 Objective 12:**

To work with the NTA to secure the expansion of the bus network, including distinct new bus networks as necessary, to serve new development and regeneration areas within the South



Dublin County area including Tallaght, City Edge, Adamstown, Clonburris, Fortunestown, Ballycullen and Newcastle.

**SM3 Objective 17:**

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

**SM3 Objective 18:**

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

**The SDCC Development Management Section have provided the following comments;**

- The proposed scheme would be very welcome as it will support more efficient and intensive use of brownfield serviced urban sites, sustainable and vibrant communities, as well as housing delivery.
- The proposed scheme will provide a good balance between servicing existing communities while not seriously and adversely effecting residential amenities, given its proposed routing
- The proposed scheme is also delivering on the wider remit of smarter travel given proposed improvements to walking and cycling infrastructure. Issues such as tree loss and the loss in carriage width dedicated to cars are decisively outweighed by improved sustainable transport opportunities, enhancement of the public realm and knock-on increase in the scope to accommodate higher-density development in the vicinity of this service/route.

## **SDCC Traffic and Transportation Section**

### **Executive Summary of SDCC Traffic and Transportation Views on the Proposal:**

SDCC are strongly supportive in principle and are of the view that it aligns with the policies of the County Development Plan (2022 – 2028). The scheme supports the National Development Plan, RSES, and the **Transport Strategy** for the Greater Dublin Area, (2022-2042). In particular, the scheme supports the sustainable movement policies within this strategic plan.

In addition, the proposed Tallaght and Clondalkin core bus corridor scheme supports the actions contained in the latest Climate Action Plan 2023. Contained within this document is the statement *“the NDP continues the Programme for Government commitment to rebalance the share of capital expenditure to favour new public transport schemes over road projects.”*

The comments provided in this SDCC submission report are mainly focussed on the construction management controls and minor design details of the scheme. To date many of our concerns have been addressed through the extensive consultation process that has been conducted by the NTA with the various stakeholders in our Local Authority area.

### **SDCC Traffic and Transportation Comments and Observations:**

The remaining aspects that the SDCC Traffic and Transportation Team would like to comment on are:

- (a) The NTA and SDCC worked closely on the design and layout of the proposed Bus Interchange at Belgard Square North and the interface with a new public plaza immediately adjacent the bus interchange. The Council is now progressing the delivery of this plaza and if this application is granted and progresses to construction it will be important that the NTA liaise with SDCC on tie ins and adjoining service connections to ensure the bus interchange and adjoining plaza are coordinated. This should be secured by planning condition. **(Sheets 1 and 2 of 56 on General Arrangement Drawings)**
- (b) There are concerns about the location of the proposed temporary compound in Bancroft Park. Its location is believed to be too close to residential properties and the location has been a well-used amenity area for a long time. The other aspect in relation of the siting of the temporary compound is the dangers posed siting a compound with the associated HGV traffic in a busy residential area which has a high proportion of elderly people. The proximity of St. Marys National School to the proposed temporary site compound has also been raised by residents. The proposal to use this open space as a temporary site compound could create negative impacts on surrounding residential areas and the final design and layout, visual impact, hours of operation, traffic and noise should be secured by planning condition for agreement with the Local Authority. If permission is granted to use this space as a temporary work compound it will need to be reinstated to its original standard and that it will be handed back to the Council when the project is completed and that it is not kept as maintenance compound into the future. **(Sheet 6 of 56 on General Arrangement Drawings)**
- (c) The scheme will remove a recent Council delivered area of high-quality public realm at the junction of Old Greenhills Road and the Greenhills Road. The NTA should provide enhanced public realm along Old Greenhills Road up to the Tallaght Village area to mitigate this loss. To address this concern, the provision of enhanced public realm works along the Old Greenhills Road should be secured by planning condition in the event that planning permission is granted. **(Sheet 6 of 56 on General Arrangement Drawings)**
- (d) There are several locations where the cycle lanes only extend short distances off the main bus connects into connecting roads and simply end where there are no existing cycle lanes. Wherever possible cycle lanes should be extended to connect into existing cycle lanes to help provide a joined-up network. For example, this would be particularly useful at the Airtown Road which is an important link road to Tallaght Square. **(Sheet 8 of 56 on General Arrangement Drawings)**

- (e) The scheme should clearly set out how the NTA will re-provide a high-quality open space at Mayberry Road and Birchview Avenue as the scheme does affect the existing amenity of Green open space at these locations. The proposal to use this open space as a temporary site compound could create negative impacts on surrounding residential areas and the final design and layout, visual impact, hours of operation, traffic and noise should be secured by planning condition for agreement with the Local Authority. **(Sheets 9, 10 and 11 of 56 on General Arrangement Drawings)**
- (f) The inclusion of pedestrian and cycle linkages from Treepark Road across the green open space to the Castletymon road is welcomed. This addresses some of the concerns of severance by the proposed Bus lanes at this location. **(Sheet 10 of 56 on General Arrangement Drawings)**
- (g) Land negotiations with the affected landowners shall be conducted and concluded as early as possible.
- (h) The design of the green space between the extended Calmount Road and the existing Greenhills road needs more consideration and better resolved design outcome.
- a. A landscaping plan should be provided for this new green space demonstrating area of planting, where desire and ped/cycle movement routes are, and how the open space will interface with the sizeable development site (Chadwicks) to the south of the green space.
  - b. The proposed cycle bridge and ramp. appears of standard engineering specification, and an uplift in design quality and appearance is warranted in this important location at a key entry in the wider City Edge regeneration lands, including for example
    - The ramps and crossings need to be a minimum of 10m wide to attract users providing for a min of 3m ped and 2m cycle lanes in both directions.
    - The landing/arrival spaces need to be sufficiently sized, open and well designed incorporating planting and signage
    - The railings and surface treatments needs to be of the highest quality, robust and durable
    - It needs to be well lit.
    - Clear and well considered wayfinding and sign posting
    - SDCC require frequent progress meetings to discuss ongoing Construction Management and Traffic Management plans and issues to ensure the continued safe and efficient operation of the roads network in the vicinity of the proposed development.
- (i) SDCC encourage further discussion between NTA and SDCC on the exact parcels of public land identified within the scheme. Also on additional CPO plots, we would

like discussion on the hand on of such lands into LA management, and the particular maintenance implications of such additional infrastructure and land bank. In summary, we need complete clarity on what land will become public realm after the scheme is completed and the maintenance implications of such lands.

- (j) SDCC see that detailed Construction Management Plans (CMP) are necessary to ensure the efficient and safe delivery of this project. The level of detail required for such CMP's is laid out below:

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

Construction traffic arising from the site shall be managed in accordance with a method statement for the management of the construction phase in accordance with an agreed site-specific Construction Traffic Management Plan that fully accords with requirements of the Council's Traffic Section. This should be secured by planning condition in the event that planning permission is granted.

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

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

The required Construction Traffic Management Plan shall include:-

- (i) Details of the agreed number, location and use of suitable facilities for vehicle cleansing and wheel washing provided on site prior to commencing of construction and a written commitment that such facilities will be maintained in a satisfactorily operational condition during all periods of construction, and;
- (ii) Location of all on-site car parking facilities provided for site workers during the course of all construction activity, and;
- (iii) Provision for dust suppression measures in periods of extended dry weather, and;
- (iv) Provision for the flexible use of a road sweeper if an acute situation on the adjoining public road requires it, and;
- (v) Location of materials compound and site huts, and;
- (vi) Details of security fencing, and;

- (vii) Name and contact details for site manager, and;
- (viii) Methodology for the use and control of spoil on site during construction, and;
- (ix) Details of access arrangements/routes to be used by construction traffic, to include details of arrangements to manage potential conflicts with site specific issues i.e. schools, playing pitches etc.
- (x) Measures to obviate queuing of construction traffic on the adjoining road network. In this regard the applicant owner or developer shall consult with the Council's Traffic Section before any works are carried out, and;
- (xi) Details of measures to protect watercourses on or adjoining the site from the spillage of deposit of clay, rubble or other debris,
- (xii) Alternative arrangements to be put in place for pedestrians and vehicles in the case of the closure of any public road or public footpath during the course of site development works;

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

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

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

### **Summary of SDCC Traffic and Transportation Views on the Proposal:**

SDCC Traffic and Transport Section are broadly happy with the planning proposal and are of the view that the proposal aligns with the policies of the NDP, RSES, GDA Transport Strategy, Climate Action Plan 2023 and the SDCC County Development Plan (2022 – 2028). This proposed Bus Connects scheme aligns with and support many of the sustainable movement and climate action policies contained in these national, regional and local strategy documents.

The comments provided in this report are mainly focussed on the construction management controls and minor design details of the scheme. Many of our concerns have been addressed through the extensive consultation process that has been conducted to date by the NTA with the various stakeholders in our Local Authority area.

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

## **SDCC Roads Maintenance Section**

**The SDCC Roads Maintenance Section have provided the following comments;**

- 1) All works to be constructed as per TII specifications unless agreed separately with SDCC Road Maintenance.

- 2) Precast kerbing is **NOT** to be permitted , except by express permission of SDCC Roads Maintenance Department.
- 3) Road Structure of bus bay is to be 300mm thick reinforced concrete slab with a geogrid overlapping the joints. 60mm Binder Course and 40mm Surface Course. To be laid over the slab. This requirement is to account for the hydraulic loading at bus stops that has caused surface deformation.
- 4) Drainage system to be designed using SuDS.
- 5) Signage to be kept to a minimum to avoid street clutter.
- 6) The delivery of enhanced bus and active travel infrastructure is supported, however, the works and materials proposed will present and increased financial management issue for the Local Authority who will have responsibility for maintaining this infrastructure into the future. .
- 7) Universal Design principles should be employed in the design.

## **SDCC Economic Development Section**

Clarity on the taking in charge line should be borne in mind to avoid creating any ransom strips along the route. In tandem with this and if observed, the completed corridor /area when handed back to the Local Authority should have clear/good title.

## **SDCC Public Realm Section**

The South Dublin County Development Plan 2022-2028 policy context of relevance to Public Realm is outlined below;

### **Chapter 3 – Natural, Cultural and Built Heritage**

#### **Section 3.3.6 Protection of Trees and Hedgerows**

- NCBH11 Objective 3: To protect and retain existing trees, hedgerows, and woodlands which are of amenity and / or biodiversity and / or carbon sequestration value and / or contribute to landscape character and ensure that proper provision is made for their protection and management taking into account Living with Trees: South Dublin County Council’s Tree Management Policy (2015-2020) or any superseding document and to ensure that where retention is not possible that a high value biodiversity provision is secured as part of the phasing of any development to protect the amenity of the area.
- NCBH11 Objective 4: To protect the hedgerows of the County, acknowledging their role as wildlife habitats, biodiversity corridors, links within the County’s green infrastructure network, their visual amenity and landscape character value and their significance as

demarcations of historic field patterns and townland boundaries. (Refer also to Chapter 4: Green Infrastructure).

#### **Chapter 4 - Green Infrastructure**

- GI1 Objective 1: To establish a coherent, integrated and evolving GI Network across South Dublin County with parks, open spaces, hedgerows, trees including public street trees and native mini woodlands (Miyawaki-Style), grasslands, protected areas and rivers and streams and other green and blue assets forming strategic links and to integrate and incorporate the objectives of the GI Strategy throughout all relevant land use plans and development in the County
- GI2 Objective 7: To enhance the biodiversity value of publicly owned hard infrastructure areas by incorporating the planting of new trees, grasses and other species, thereby integrating this infrastructure into the overall GI network
- GI5 Objective 3: To ensure compliance with the South Dublin Climate Change Action Plan and the provisions of the Council's Tree Management Strategy.
  - Increase the County's tree canopy cover by promoting annual planting, maintenance preservation and enhancement of trees, woodlands and hedgerows within the County using locally native species and supporting their integration into new development.
  - Identify suitable sites for new urban trees including Miyawaki style mini woodlands, where feasible.
  - Promote the planting of new woodlands and forestry within appropriate open space and park locations within the County.
  - To recognise the value of mature trees in terms of carbon sequestration and amenity over saplings
- GI5 Objective 6: To provide more tree cover across the county, in particular to areas that are lacking trees, with an emphasis on planting native Irish trees as appropriate.

#### **Chapter 8 – Community Infrastructure and Open Space**

- COS5 Objective 8: To ensure the design of parks and public open space areas is of high quality; to provide a pleasant setting, accommodate use by people of all ages and abilities, to support life-long activity and good health and well-being by the provision of a balanced mix of active and passive recreation and access to, or view of, nature, ensuring that the design considers:
  - provision of an appropriate mix of hard and soft surfaced areas.
  - enhancement of biodiversity and existing trees and hedgerows.
  - incorporation of water courses, other natural features and existing built heritage into the design of parks and open spaces as appropriate.

- provision of new planting, landscape features and appropriate site furniture including a variety of accessible, well located and designed seating.

**Policy GI4: Sustainable Drainage Systems Require the provision of Sustainable Drainage Systems (SuDS) in the County and maximise the amenity and biodiversity value of these systems.**

- GI4 Objective 1: To limit surface water run-off from new developments through the use of Sustainable Drainage Systems (SuDS) using surface water and nature-based solutions and ensure that SuDS is integrated into all new development in the County and designed in accordance with South Dublin County Council's Sustainable Drainage Explanatory Design and Evaluation Guide, 2022.
- GI4 Objective 2: To incorporate a SuDS management train during the design stage whereby surface water is managed locally in small sub-catchments rather than being conveyed to and managed in large systems further down the catchment.
- GI4 Objective 3: To require multifunctional open space provision within new developments to include provision for ecology and sustainable water management.
- GI4 Objective 4: To require that all SuDS measures are completed to a taking in charge standard.
- GI4 Objective 5: To promote SuDS features as part of the greening of urban and rural streets to restrict or delay runoff from streets entering the storm drainage network
- GI6 Objective 8: To support, in agreement with the delivery authority, the provision of outdoor public water drinking fountains along all new and future dedicated cycleways, promoting reusables and actively incentivising transition from single use plastic.
- GI6 Objective 9: To investigate the potential to plant hedgerows along roads to help mitigate noise and air pollution, and to increase visual amenity and enhance biodiversity.

**South Dublin County Council's: Tree Management Policy – Living with Trees 2021-2026**  
The South Dublin County Council Tree Management Policy 'Living with Trees' 2021-2026 contains information within Chapter 7 Trees and Development that relates to the retention, protection and planting of trees on development sites.

Policy: The Council will use its powers to ensure that where it is conducive with the objectives of the County Development Plan, and other planning objectives, there is maximum retention of trees on new development sites.

Relevant points within this section include:

The Council is committed to continuously improving the way that tree, biodiversity, and landscape issues are considered in relation to applications for new development. There is



increasing pressure to both maximise available development opportunities and at the same time protect and enhance existing landscape and biodiversity features.

- The Council will use its powers to ensure that where it is conducive with the objectives of the County Development Plan, and other planning objectives there is maximum retention of trees on new development sites.
- In the processing of planning applications, the Council will seek the retention of trees of high amenity / environmental value taking consideration of both their individual merit and their interaction as part of a group or broader landscape feature.
- On construction sites all work must be in accordance with British Standard 5837 (2012): Trees in Relation to Design, Demolition and Construction – Recommendations.
- South Dublin County Council will consider the protection of existing trees when granting planning permission for minor and major developments and will seek to ensure the maximum retention, preservation and management of trees, groups of trees and hedges.
- Where development is proposed it is essential that existing trees are considered from the very earliest stages of design and prior to an application for planning permission being submitted. Root systems, stems and canopies, with allowance for future movement and growth, need to be considered in all projects.

#### **SDCC Parks and Landscape Section Comments:**

##### **Trees and Hedgerows:**

SDCC have serious concerns about the loss of trees and hedgerows in the proposed plans. The proposed removal of trees from SDCC lands is not matched by replacement trees planting in South Dublin within the proposals.

*"186 individual trees, 33 tree groups, ten hedges and two shrubs are to be removed to facilitate the Proposed Development"*

*"In addition, 13 individual trees and one tree group of very low quality (Category U) are also recommended for removal."*

*"15 individual uncategorised trees are also to be removed. These features were outside the scope of the original tree survey and were not subject to a formal tree survey."*

##### **Arboricultural Impact page 13**

The amount of trees removed within the tree groups are not numbered.

The entire scheme proposes: 1,055 no. trees planted; and 590m of proposed hedgerow

The Green Infrastructure Strategy for SDCC requires developments to examine the green infrastructure within the development and develop and enhance the GI within their own development and link it to the wider, regional GI.

Promotion of walking and cycling is dependant not just on provision of facilities but also creation of a suitable environment for walking and cycling, it is important to retain trees where possible and replant trees to create tree lined streets to ensure the urban heat island effect is reduced where walking and cycling occurs. E.g. Belgard Square North and Belgard Square West in Tallaght Town Centre will be largely denuded of existing trees, with a greatly reduced number of smaller trees being replanted.

To address this concern and in the event that planning permission is granted, a planning condition should be secured seeking the provision of a detailed landscape strategy for agreement with the local authority, demonstrating how trees and vegetation along all streets will be provided. As part of this the applicant should demonstrate how, within SDCC, they will re-provide 125% of trees removed and provide 150% of hedgerow removed. This will ensure air quality impacts, heat island effects and loss of biodiversity are minimised, and landscape amenity is retained

### **Natural SuDS**

We note and welcome some proposals for natural SUDs across the scheme. There is a concern that the some of the swales proposed may not be sufficiently deep which would impact on their viability.

Also there are concerns with the overall extent of Natural SuDs across the scheme. Where possible this should be increased in line with SDCC's adopted County Development Plan .

A planning condition should be secured seeking the provision of a detailed landscape strategy for agreement with the local authority, demonstrating how natural SUDS using swales and nature-based solutions will be incorporated and maximised across the scheme. This would help create ecological links and decrease urban heat island effect. See requirements for same in SDCC's County Development Plan. (Policies under G14 copied above). Attention is drawn to SDCC's SUDS design manual in relation to Natural Based Suds, which is required to be implemented under the county development plan policy: <https://www.sdcc.ie/en/climate-action/spotlight-sustainable-drainage-systems/suds-evaluation-guide.pdf>

### **CPO of public land:**

SDCC Public Realm section is unconvinced of the necessity of CPO of public land to carry out public works.

### **Permanent CPO (and temporary CPO) of part of Bancroft Park:**

- Notwithstanding the comments raised in the traffic section above, if planning permission is granted for the use of Bancroft Park as a temporary compound, a planning condition should require the applicant to replace existing boundaries at Bancroft Park with a low stone wall and mild steel galvanised railing, galvanised and powder coated black to the agreement of SDCC's public realm section. Replacement entrance details for the park are also to be agreed with SDCC's public realm section. Also the reinstatement and landscape compensatory measures (to compensate for loss of access to public open space and amenity) are to be agreed with SDCC Public Realm Section prior to commencement of any works.

**Permanent CPO (and temporary CPO) of part of Tymon Park:**

**(Lands to be Compulsorily Acquired Deposit Map Legend: O.S. Ref: 3327-13 3327-18 Sheet 11 of 39)**

Tymon Park is a regional park, it is located, quite unusually, on esker soil and is a high-quality natural habitat that SDCC has been maintaining and restoring over many years. It has been noted by the Biodiversity Data Centre as an area of high importance due to the quality of the meadows and Tymon Park won the best pollinator site in 2022.

- The land proposed for temporary and permanent CPO that encroach into Tymon Park (SDCC's landmark public regional park) is excessive and not welcomed.
- On sheet 13 of the general arrangement drawings, at the western edge of Tymon Park, the proposed realignment of the Bus Connects route on Greenhills Road introduces a wide sweep that encroaches onto the Park. The extent of the road sweep at this location seems excessive and could be reduced within the extent of the existing red line for the planning application.

Tymon Park is also an important feeding site for over wintering Brent Geese:

*"Certain species, such as light-bellied Brent geese, often forage on inland sites in the Greater Dublin Area. Suitable sites are usually composed of open parkland / playing pitches. A number of confirmed inland wintering bird feeding sites are known to occur within approximately 300m of the Proposed Scheme, the distance within which birds would be expected to be displaced. Most notably, this includes Tymon Park, where a flock of 45 light-bellied Brent geese were observed foraging during the field surveys on one occasion."*

*Extract From EIAR page 12.*

Tymon Park is a long-established, well-known, overwintering habitat for Brent Geese. SDCC have made considerable progress recently in ensuring the Tymon Park environment is as supportive as possible and the sighting of 45 No. geese foraging at Tymon Park during the field survey acknowledges that success.

*"Construction Compound TC6 is proposed for an area within Tymon Park (CBC0809WB003), east of the M50. In addition, permanent land take at the edge of this Tymon Park overlapping with wintering bird survey site CBC0809WB003 will also be required to accommodate proposed pedestrian and cyclist infrastructure. The provision of Construction Compounds TC3, TC4 and TC8 to facilitate nearby construction works will result in the temporary loss of suitable wintering bird habitat for the duration of construction of the Proposed Scheme. Wintering bird surveys (extensive transect in open territory at Birchview Avenue (referred to as CBC0809WB003)) correspond to the proposed Construction Compounds TC3 and TC4"*

*Extract from EIA for the scheme Chapter 12 biodiversity.*

In relation to the surveys carried out for Wintering Birds, SDCC query why the western side of Tymon Park shows a transect that extends outside the red line boundary and into the park but the transect along the eastern side of Tymon Park (where the Brent Geese are known to over winter) remains along the roadside on Greenhills Road. Can applicant confirm that sufficient

transects were taken to establish the levels of Brent Geese in the area. We do note that 45 No. birds were noticed during one site visit.

**Tymon Park boundaries and entrances:**

The boundaries to SDCC Tymon Park in this part of the county were built in a time of scarcity of public funds, they are typically concrete blocks topped with low palisade fencing, the entrances are of low quality. It is an objective of the council to replace these boundaries and entrances with more visually appealing boundaries: low stone walls with mild steel galvanised railing, powder coated black. In the light of SDCC's previous request to the applicant to replace any boundaries they remove with this modest proposal; the proposal of the applicants to 'replace existing boundaries' (i.e. like for like) is disappointing. Given the proposed loss of parkland, loss of amenity and disturbance to our park users, we would request the following condition:

- The applicant be required to replace existing boundaries at Tymon Park with a low stone wall and mild steel railing, galvanised and powder coated black to the agreement of SDCC's public realm section. Replacement entrance details for the park are also to be agreed with SDCC's public realm section.
- Notwithstanding the above the applicants should be directed to make all efforts not to encroach into Tymon Park for the above previously outlined reasons.

**Proposed Compound locations:**

**Proposed Compound location TC1**

- Reinstatement and landscape compensatory measures (to compensate for loss of access to public open space and amenity) are to be agreed with SDCC Public Realm Section prior to commencement of any works, particularly given the number of trees that will be removed at this location. Efforts should be made to avoid existing tree loss for these temporary works and protect existing trees during the construction works.

**Proposed Compound location TC2**

- Reinstatement and landscape compensatory measures are to be agreed with SDCC Public Realm Section prior to commencement of any works.

**Proposed Compound location TC3**

- Protection of existing habitats, reinstatement and landscape compensatory measures are to be agreed with SDCC Public Realm Section prior to commencement of any works, particularly given the significant loss of existing planting at this location.

**Proposed Compound location TC4**

- Protection of existing habitats, reinstatement and landscape compensatory measures are to be agreed with SDCC Public Realm Section prior to commencement of any works

**Proposed Compound location TC5**

- Location within Tymon Park: SDCC recommend locating elsewhere. If ABP do not agree, protection of existing habitats, reinstatement and landscape compensatory measures are to be agreed with SDCC Public Realm Section prior to commencement of any works.

**Proposed Compound location TC6**

- Location within Tymon Park: SDCC recommend locating elsewhere. If ABP do not agree, protection of existing habitats, reinstatement and landscape compensatory measures are to be agreed with SDCC Public Realm Section prior to commencement of any works.

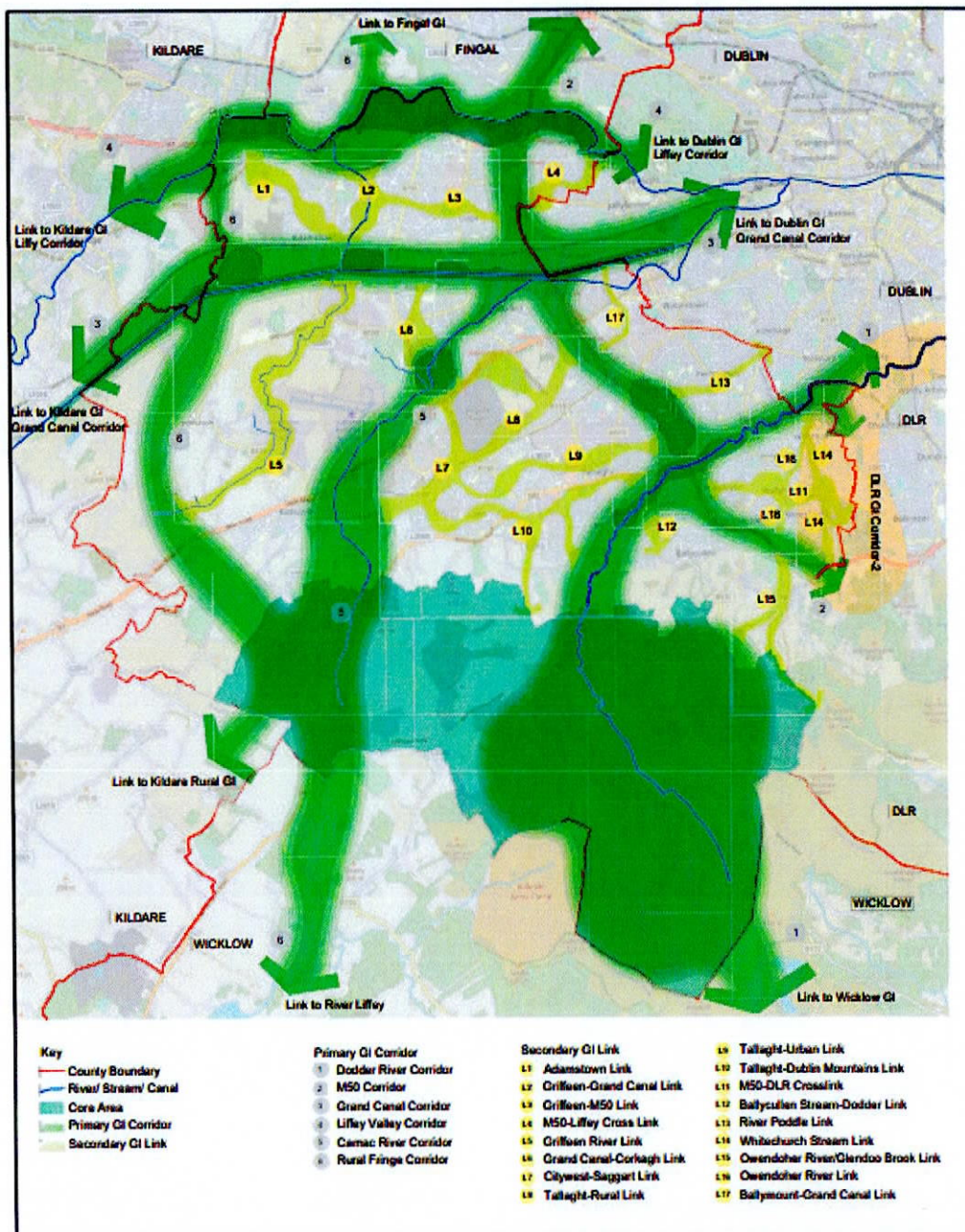
**Adjacent to Grand Canal in SDCC**

The applicant is to be commended for retaining vegetation at this location, opportunities for further greening the proposals at this location are to be agreed with SDCC public realm prior to commencement of any works.

**Biodiversity:**

**Green Infrastructure Corridors:**

The site traverses the Strategic Corridor 2: M50 of the County GI Strategy at Tymon Park.



South Dublin County Council Development Plan: Green Infrastructure Strategy Map

### Strategic Corridor 2: M50 Corridor

The M50 is an important piece of national transport infrastructure that links South Dublin County Council to DLR, DCC, and Fingal. While it acts to sever connectivity for biodiversity and for local communities, the GI Strategy recognises that there are opportunities for GI enhancement along the M50. The M50 spans the biodiversity corridors of the River Liffey, the Grand Canal, the Camac, the Poddle, the Dodder, and the tributaries of the Whitechurch and Owendohar Rivers. It also spans the Dodder Valley Linear Park and bisects Tymon Park. A range of other open spaces and local and neighbourhood parks are also located along its perimeter, such as at Ballymount, Kilnamanagh, Knockmitten, and Collinstown.

An opportunity exists to identify and enhance the interconnection of the parks, green spaces and river corridors situated along the M50. Measures include providing additional north-south, pedestrian and cyclist green links (For example, at Grand Canal) as well as east-west links where possible. This will help create further GI connectivity for the benefit of biodiversity and for recreational purposes.

### **Overarching Objectives:**

- To enhance connectivity between existing parks and open spaces on either side of the M50 corridor.
- To enhance corridor links and biodiversity value through appropriate planting along both sides of the M50 Corridor, to maximise opportunities to ameliorate noise and air pollution, increase visual amenity, enhance biodiversity and provide continuous ecological corridors and green links where possible in consultation with TII / NTA.
- To promote the connectivity of the M50 GI Corridor with Dublin's wider regional GI network, in consultation with Dún Laoghaire–Rathdown County Council and Fingal County Council.
- To investigate the potential to implement improved pedestrian and cycling infrastructure between the Grand Canal corridor and green spaces at Knockmitten.
- To identify and support additional north-south pedestrian and cyclist green links (for example at Grand Canal) as well as east-west links where possible.

The site is also within Strategic Corridor 3 (the Grand Canal) at a crucial point where it overlaps with Strategic Corridor 2 above (the M50) and meets with Strategic Corridor 5 (the Camac River Corridor).

### **Strategic Corridor 3: Grand Canal Corridor**

The Grand Canal is a key national Green Infrastructure feature, acting as a major ecological and recreational link between the River Shannon in the midlands and Dublin City where the canal enters the sea. As a proposed Natural Heritage Area, the Canal supports a range of key ecosystem services along its entire route and offers a major route for a range of protected species from Dublin's rural hinterland through the urban environment of South Dublin County. While the Grand Canal offers significant opportunities for recreation and amenity, these provisions must be appropriate to the status of the Canal, at a time of biodiversity loss, as a key biodiversity corridor. This is particularly important when the Canal encounters the more urban environment of South Dublin County, where higher population densities and demand for recreational provision has the potential to sever and fragment the Canal's regional ecological connectivity.

The Grand Canal Corridor forms a major point of interaction with other identified Strategic Corridors in this Strategy: the M50 Corridor, the Rural / Urban Fringe corridor, and the Liffey-to-Liffey Corridor, while further local links connect it to the other areas of the Liffey Valley Corridor.

There are also opportunities to connect to the Royal Canal Greenway in Fingal County Council, expanding the potential for additional GI connectivity in the Dublin region.

### **Overarching Objectives:**

- To protect and enhance the Grand Canal as an ecological green corridor, recognising its role as a national / regional corridor for wildlife and some ecosystem services.
- To ensure that development along and adjacent to the Grand Canal, including the sensitive provision of amenity and recreational facilities, recognises the Canal's ecological status, avoiding areas and features of biodiversity and heritage sensitivity, and that appropriate set-back distances or buffer areas are identified and included.
- To facilitate and enhance connectivity, both ecological and amenity, between the Grand Canal and Royal Canal Greenways.
- To engage with stakeholders along the Grand Canal to achieve shared objectives for this GI feature, without negatively impacting on the Canal's natural ecosystem services.
- To improve permeability and access to the Grand Canal for residents and visitors in a manner that does not cause habitat fragmentation.
- To ensure that the design of recreational and amenity facilities along the Grand Canal Corridor will enhance and protect the character of the landscape through which it passes (see Appendix 9: South Dublin County Landscape Character Assessment, for landscape character details).

Given the route proposals along and through these key green infrastructure corridors, the Bus Connects proposal should seek to improve ecological links within these corridor areas and enhance connectivity between parks, open spaces and ecological areas. Any proposals that further fragment the green infrastructure assets within these areas should be designed out insofar as possible. Planting of native trees and hedgerows and use of natural based SuDS measures should be carefully planned and proposed to enhance existing habitat and provide ecological buffer zones. SDCC would expect the proposals to enhance the ecological green corridors in these areas, providing green links through, around, over or under grey infrastructure.

- SDCC are of the opinion that the proposals at present do not provide enhancement of the green infrastructure corridors to the extent required.
- In the event of a grant of planning permission. SDCC would request that a planning condition be secured requiring the provision of a green infrastructure plan to be agreed with the local authority, setting out how enhancements and ecological links throughout the scheme would be delivered in line with the identified Green Infrastructure Corridors as set in SDCC's adopted County Development Plan e.g. Strategic Corridors 2 and 3) be agreed with SDCC prior to commencement on site

### **Lighting:**

The following provisions of the County Development Plan are noted.

### **GI6 Objective 6:**



To minimise the environmental impact of external lighting within the GI network to achieve a sustainable balance between the recreational needs of an area, the safety of walking and cycling routes and the protection of light sensitive species such as bats (See Chapter 3: Natural, Cultural and Built Heritage and Chapter 12: Implementation and Monitoring).

#### **IE8 Objective 6:**

To ensure external lighting schemes minimise light spillage or pollution in the immediate surrounding environment and do not adversely impact on residential or visual amenity and biodiversity in the surrounding areas having regard to the Institute of Lighting Engineers' Guidance Notes for the Reduction of Light Pollution (UK). (see section 12.11.4 (iii)).

#### **Landscape Character Type: Green Space e.g. Tymon Park and Bancroft Park**

In the event of a grant of planning permission a Public Lighting condition should be secured demonstrating how public lighting will balance the needs of environment, wildlife and the public using these streets. The proposal should consider the environmental zones as set out on page 522 of SDCC Development Plan.

#### **Protection of Habitats and Species:**

The South Dublin County Development Plan 2022-2028 emphasises the protection of habitats and species, particularly those not covered by European or Irish legislation. It highlights the need to safeguard rare species and their habitats, including those protected under the European Habitats Directive.

Bats are a European protected species which the Council is obliged to monitor and report on.

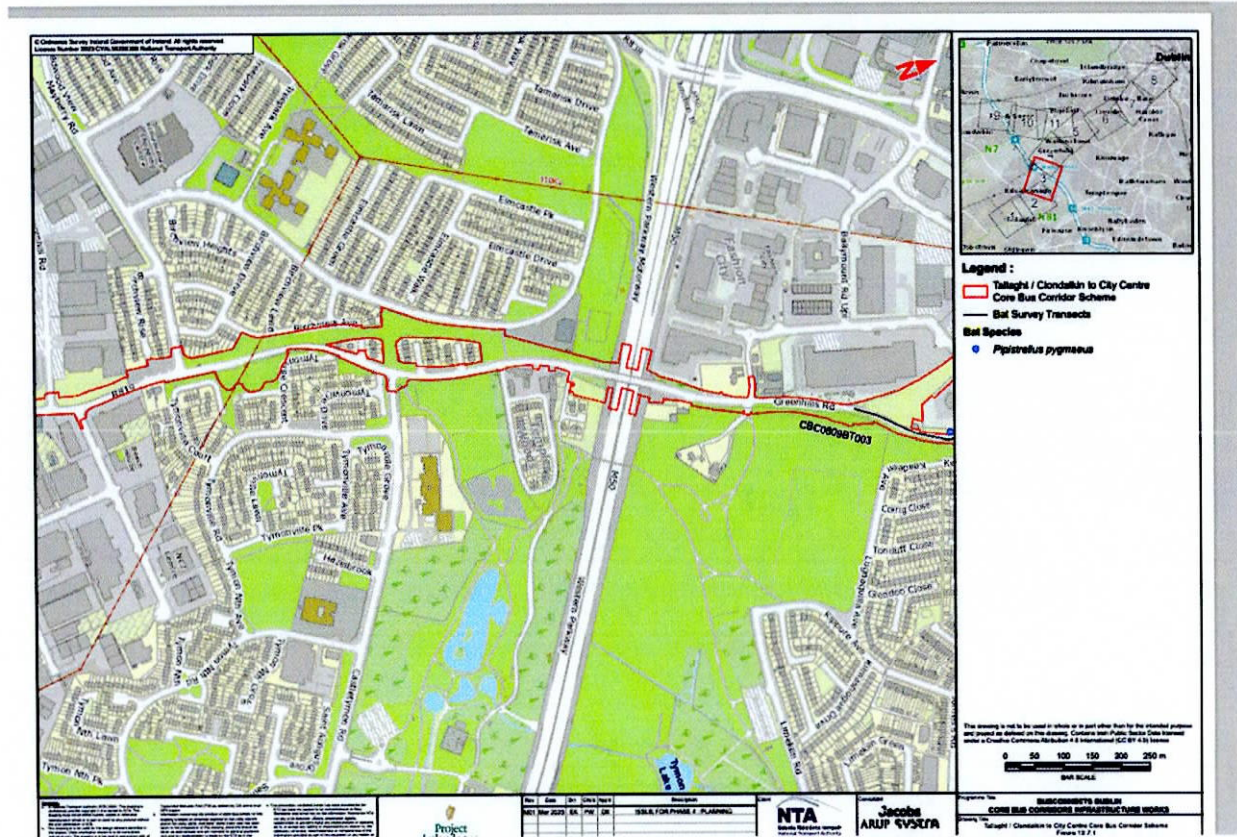
We note with concern the lack of bat survey transects for a significant portion of the proposed route between Bancroft Park and Tymon Park; see Drawing CIDE-JAC-ENV\_BD-0809\_XX\_00-DR-GG-0403 below. Tymon Park is part of the significant ecological corridor in the county that is a named Green infrastructure Strategic Corridor.. It represents a significant ecological corridor that runs north south through the county. One can see from the map below the significant corridor of green space that runs north south at this location. One would expect bat surveys to be carried out to ensure the EIAR properly assesses the impact of the scheme. The omission of bat survey work in this area, given the significant proposed changes to the open space areas in this locality raises concerns about the assessment of impacts on biodiversity.

It is also of note that the proposal removes hedgerow from this location and encroaches into Tymon Park, introducing new lighting into this area. The EIAR does not consider this during the operational stage:

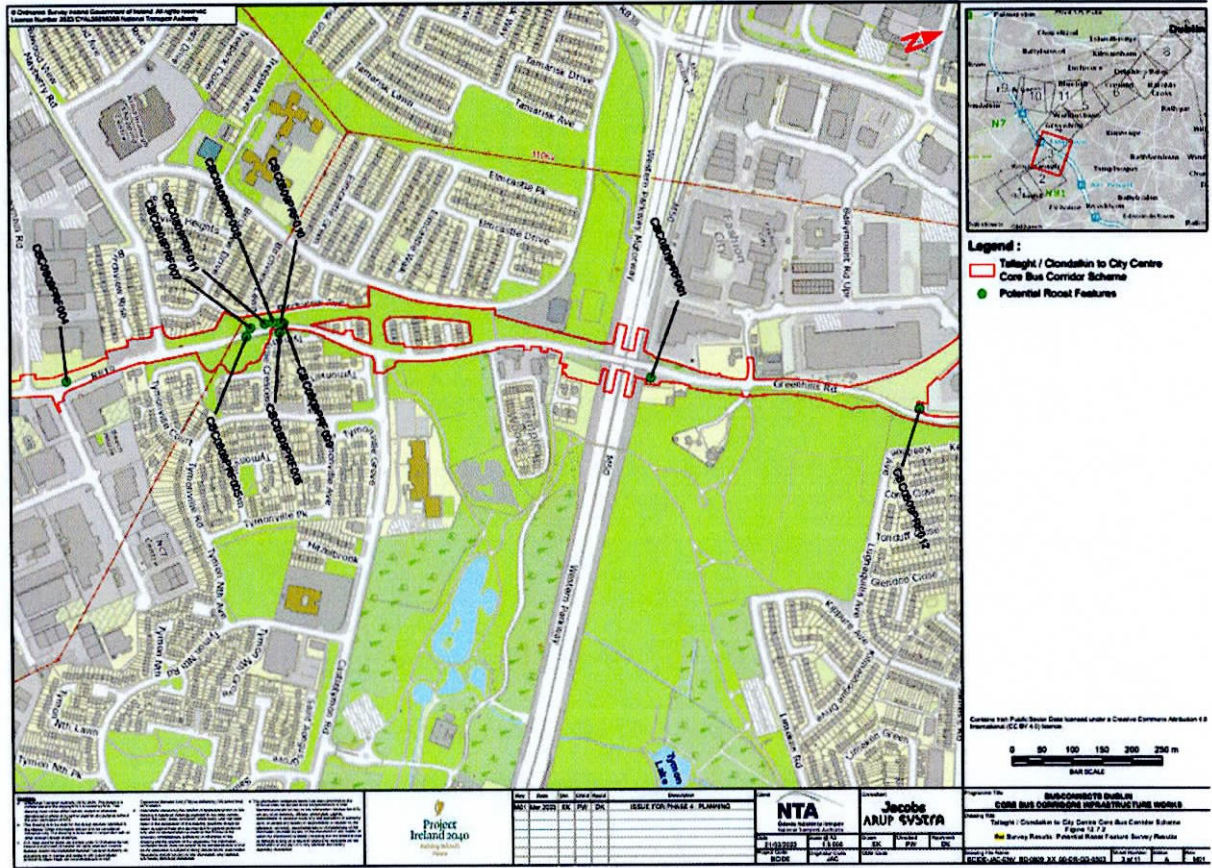
*“Given the urban environment of the Proposed Scheme, and the fact that artificial lighting is already present along the footprint of the Proposed Scheme, the effects of displacement as a result of increased artificial lighting along existing road networks are not considered to be significant at any geographic scale. This is because the lighting strategy involves the use*

and upgrade of existing lighting infrastructure and given that artificial lighting is already in place along the Proposed Scheme, bat species who utilise the area would already be habituated to some level of artificial lighting.” Page 114 EIAR

Given the identification of potential bat roosts by the project team within this area of Tymon Park makes the lack of bat survey transects all the more puzzling. (See potential roost location drawing below BCIDE-JAC-ENV\_BD-0809\_XX\_00-DR-GG-0503)

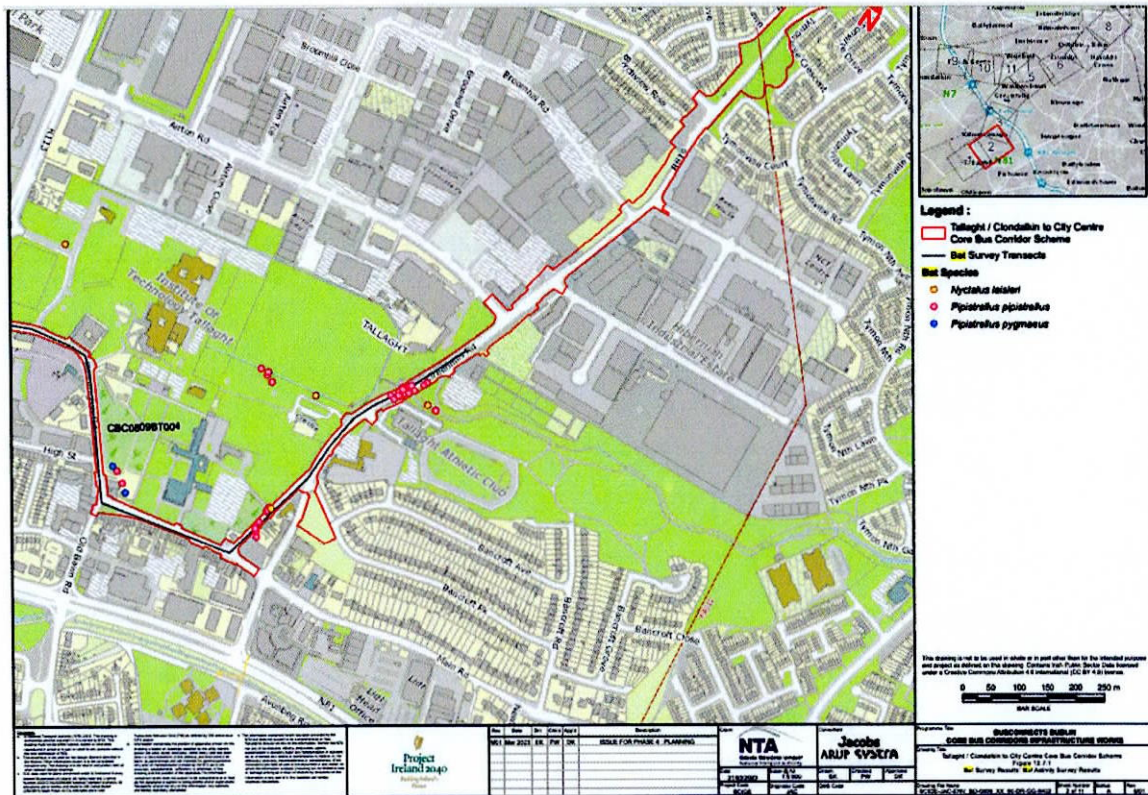


**Tymon Park: Drawing No.: CIDE-JAC-ENV\_BD-0809\_XX\_00-DR-GG-0403**  
 Open space both sides of road, no bat transects at this location.



**Drawing No.: BCIDE-JAC-ENV\_BD-0809\_XX\_00-DR-GG-0503**  
**Potential bat roost locations. No bat transects undertaken.**

- The applicant is requested to carry out further bat survey work along the proposed route between Bancroft Park and Tymon Park, in discussion with SDCC and assess the findings against the proposals.



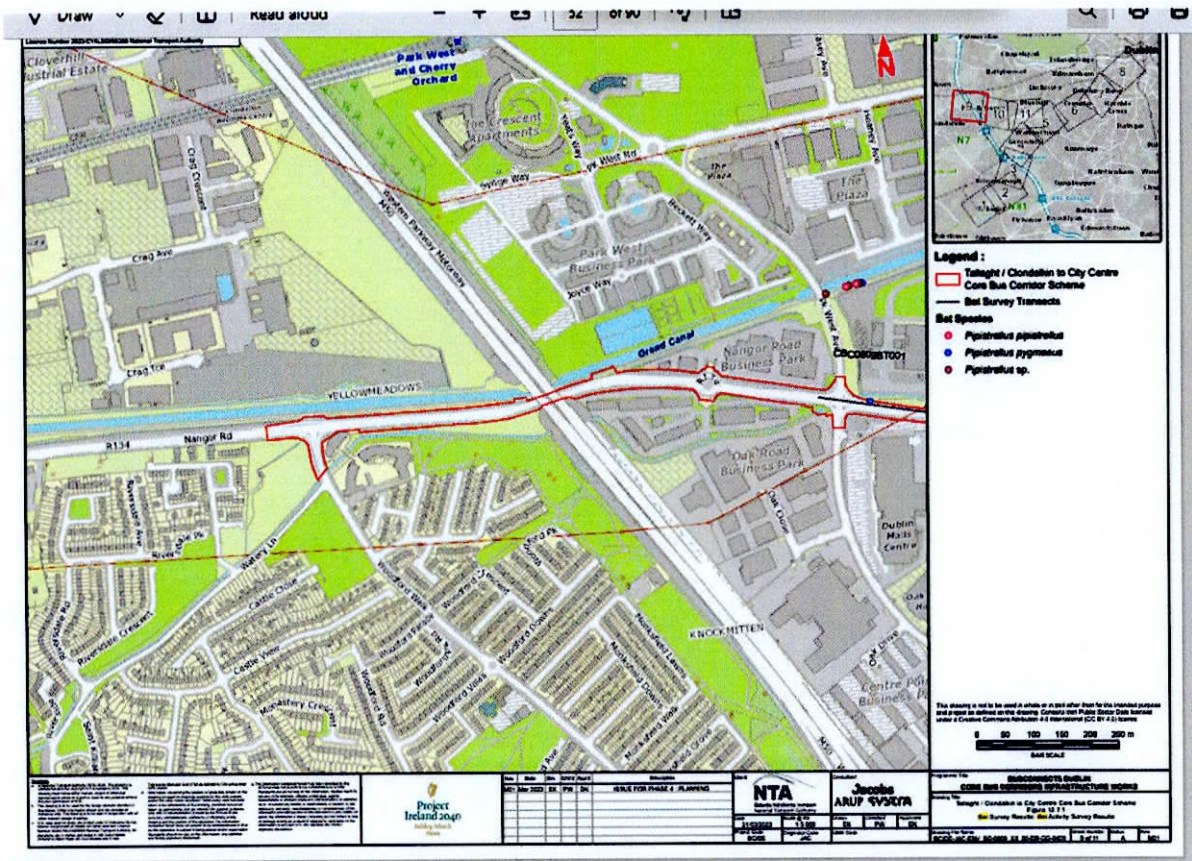
**Bancroft Park: Drawing No: BCIDE-JAC-ENV\_BD-0809\_XX\_00-DR-GG-0402**

Note the number of bats found where surveys were carried out, obviously these bats travel between Bancroft Park (eastern side of road) to Technological University Tallaght lands (western side of road). Note similar set up of open space at Tymon Park but no bat surveys carried out at that location

The location of the new road link connecting Greenhills Road to Ballymount Avenue (SDCC Road reservation) is a under maintained area at the moment, and acts as a green corridor. Bat surveys are recommended for this location as well. It is impossible to assess the impacts of the scheme where bat surveys have not been carried out.

- The applicant is requested to carry out further bat survey work at the location of the new road link connecting Greenhills Road to Ballymount Avenue in discussions with SDCC and assess the findings against the proposals.

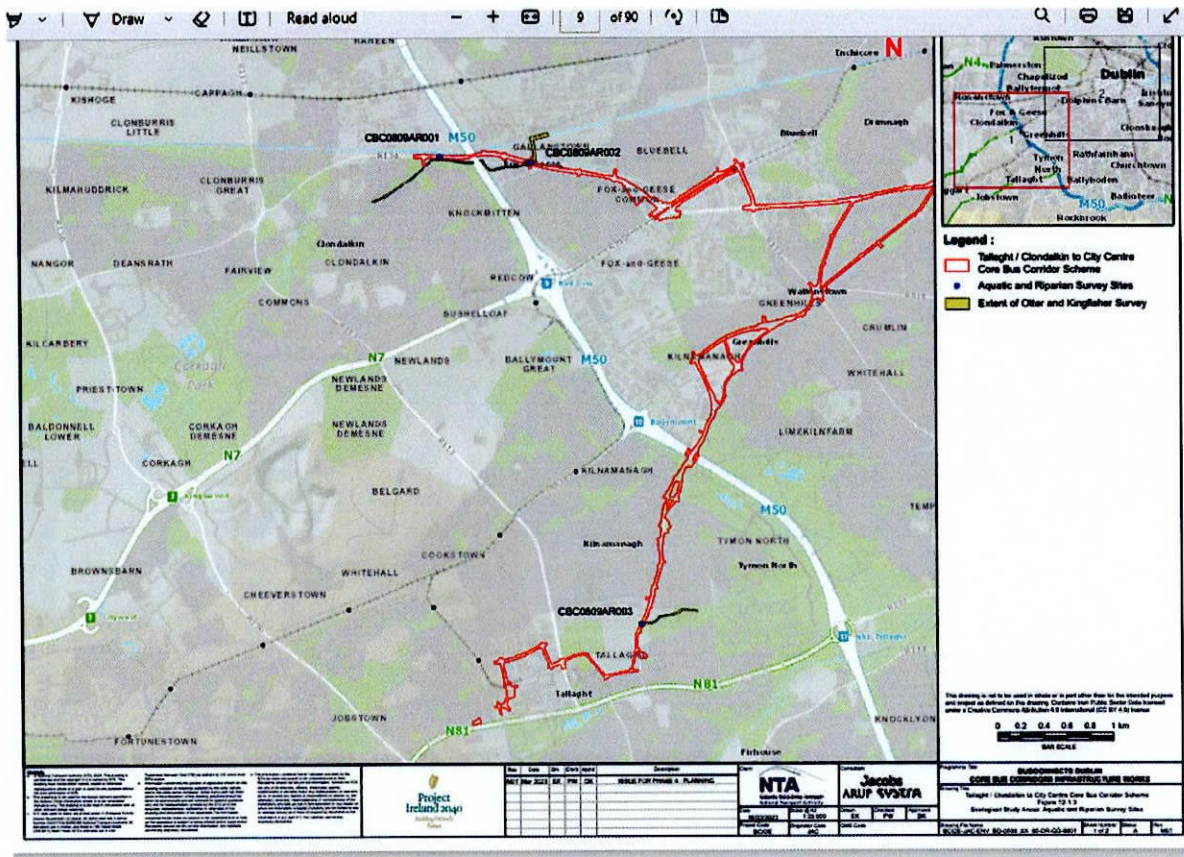
Similarly concerning; there are no bat survey transects recorded where the development is adjacent to the Grand Canal (see bat survey location drawing below)



**Grand Canal Location: Drawing No. BCIDE-JAC-ENV\_BD-0809\_XX\_00-DR-GG-0409**

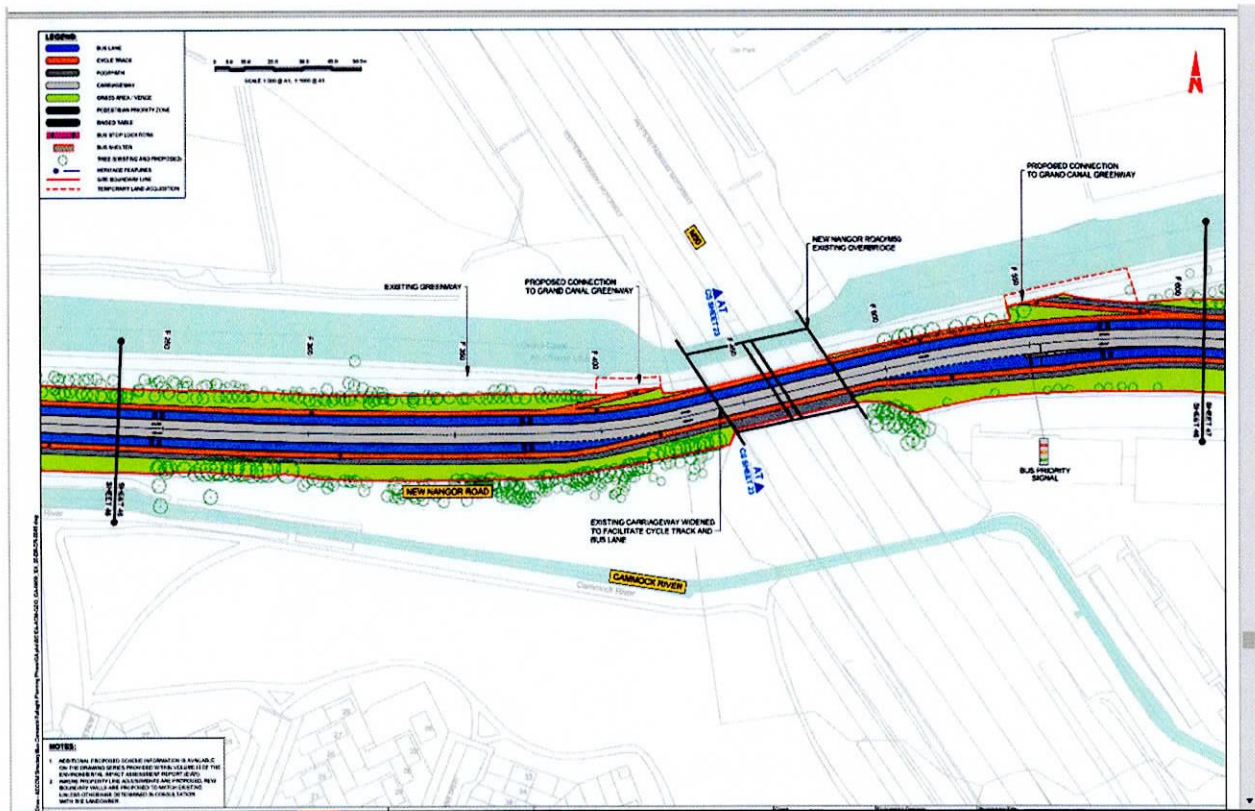
SDCC would expect, given the proximity of the site at this location to the pNHA at the Grand Canal, and the linear nature of the Grand Canal ecological corridor (A Green Infrastructure Core Area in the SDCC County Development Plan) that is of national importance -connecting Shannon River to Dublin Bay Biosphere- that the applicants would have chosen this location as one of the locations to survey for bats, to ensure potential impacts are properly assessed.

- The applicant is requested to carry out further bat survey work at the location of the proposals adjacent to the Grand Canal pNHA in discussions with SDCC and assess the findings against the proposals.



**Ecological Study Areas: Aquatic and Riparian Survey Sites**  
**Drawing No. : BCIDE-JAC-ENV\_BD-0809\_XX\_00-DR-GG-0901**

Regarding the above surveys marked Aquatic and Riparian Survey Sites, given the importance of the Grand Canal as an ecological corridor otter and kingfisher surveys along its length should be carried out where the scheme runs adjacent to it and the sparsity of aquatic and riparian survey carried out. Added to the lack of bat transects in the area, it seems a significant omission. There are proposals to carry out works within the buffer zone of the pNHA and even within the pNHA area itself. See general arrangement drawing below:



**General Arrangement Drawing: BCIDA-ACM-GEO\_GA-0809\_XX\_00-DR-CR-9001**

- The applicant is requested to further assess the habitats within the Grand Canal pNHA area and submit proposals to enhance and connect the ecological habitats along this section of the route for agreement with SDCC.

### **Public Realm Enhancement:**

The Belgard Square West proposal for reinstatement of footpaths should include the same stone paving on both sides of the road to ensure consistency.

## **SDCC Active Travel Section**

The SDCC Active Travel team have met with the Bus Connects team and went through the boundary issues with the Tallaght Public Realm schemes. The interfaces have been considered and the level of abortive work has been minimised. It was noted that significant early engagement on this route and around the area of the bus interchange in particular was undertaken.

## **SDCC Architectural Conservation Section**

### **Appraisal**

The Tallaght to City Centre section of the Proposed Scheme will commence west of Tallaght Village at the Square Shopping Centre. There are no features of note until the route turns on to Blessington Road. The route passes through the historic village core and Architectural Conservation Area of Tallaght village.

There are a number of Protected Structures located within the area of Tallaght Village including; St. Maelruain's Church RPS Ref. 272 and St. Mary's Dominican Priory RPS Ref. 273. The protected structures and other historic buildings along Blessington Road, Main Street and Greenhills Road are principally of 19th and early to mid-20th century construction. 18th and 19th century buildings were identified on Blessington Road and main street while early 20th century terraced housing designed by T. J Byrne was identified on the Main Street provide the ACA with character.

St. Basil's Training Centre RPS Ref. 268 is a Protected Structure located on the Old Greenhills Road. There are few other features of note on the Greenhills Road, but they include an old rubble wall which is a remnant of what was a country lane and Tymon Farm, and the Cuckoo's Nest Pub.

Full details of the Protected Structures and sites/buildings/features of architectural interest are included in detail as part of the Environmental Impact Assessment Main Report (Chapter 16). The report has identified items not included on the RPS and other items of interest.

With regard to the proposed scheme, indirect physical Construction Phase impacts are anticipated in three locations, where protected structures of National Importance and High Sensitivity share a boundary with the Proposed Scheme, which include St. Maelruain's Church RPS Ref. 272. The Protected Structure will not be directly impacted by the Proposed Scheme, but there is potential for damage during construction. The magnitude of impact is considered medium. The potential Construction Phase impact will be Indirect, Negative, Significant and Temporary. It is therefore considered that a Safety Statement should be completed detailing how shared boundary features which form part of a Protected Structure site will be safeguarded during the proposed scheme. The safety statement should be submitted for the agreement and approval of the Council Architectural Conservation Officer.

Indirect physical Construction Phase impacts are anticipated in 28 locations, where protected structures of Regional Importance and Medium Sensitivity share a boundary with the Proposed Scheme. They are outlined in Table 16.7 and described in Appendix A16.2 Inventory of Architectural Heritage Sites in Volume 4 of the EIAR. The structures are of Medium Sensitivity. None of these features will be directly impacted by the Proposed Scheme, but there is potential for damage during construction. The magnitude of impact is Medium. The potential Construction Phase impact will be Indirect, Negative, Moderate and Temporary.

The installation of the proposed paving, landscaping and urban realm works on Blessington Road, Main Street and Greenhills Road will not directly impact the buildings or street furniture within Tallaght ACA, however, there is potential for damage during construction. The magnitude of impact is Medium. The Tallaght ACA is of Regional Importance and Medium Sensitivity. The potential Construction Phase impact on the ACA will be Indirect, Negative, Moderate and Temporary. All proposed works as part of the scheme within Tallaght ACA should be included in the Safety Statement including a method statement for works and how architectural sites/features/buildings will be protected during the construction phase.



Section 16.5 Mitigation and Monitoring Measures have been detailed. Construction Phase Proposed mitigation measures for architectural heritage features are outlined in this Section and detailed in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR. The methodology has been prepared in accordance with the Department of Arts, Heritage and the Gaeltacht (DAHG) Architectural Heritage Protection: Guidelines for Planning Authorities (DAHG 2011) and Paving.

A summary of Construction Phase impacts following the implementation of mitigation measures is provided in Table 16.19. Mitigation measures are detailed in Vol 4 Appendices and under Section A16.3 a methodology is provided. The details have been assessed and are considered appropriate in the overall approach. It is considered that when works are due to commence Bus Connects project team should contact the Local Authority Architectural Conservation Officer in order to discuss specifications for works/repairs etc where required.

### Conclusion

The EIAR completed for the Bus Connects Scheme Route (Tallaght-City Centre) includes a very detailed and comprehensive overview of Protected Structures and Architectural Conservation Areas and Architectural features/items located within the vicinity of the proposed route. A Methodology has been developed and is included in the Appendices (A16.3).

The methodology gives due consideration to architectural conservation principles in providing an overall approach. One of the main areas that has not been fully detailed in where an existing boundary of a Protected Structure site is shared with the proposed scheme. Potential Impact has been identified with regard to possible damage during construction phase, it is therefore considered that details are required by way of a safety statement and associated method statement in addressing this particular concern.

In the event of a grant of planning permission a planning condition should be secured that when works are due to commence, the Bus Connects Project Team should contact the Local Authority Architectural Conservation Officer in order to discuss specifications for works/repairs and finishes etc where required.

## SDCC Water Services Section

Water Services have revised the proposed scheme and provided the following comments, in addition Irish Water drawings are appended to this report with

All structures should have a setback distance to the outside diameter of surface water sewers as per attached table.

<b>SDCC Minimum Separation Distances from Proposed Building to Surface Water Sewers</b>			
<b>Depth to Invert</b>	<b>Sewer Diameter 225 - 449mm dia.</b>	<b>Sewer Diameter 450 - 749mm dia.</b>	<b>&gt;750mm dia.</b>
< 3m	3m	3.5m	Contact SDCC
3m - 4m	3m	4m	Contact SDCC

4m - 5m	5m	5m	Contact SDCC
5m - 6m	5m	6m	Contact SDCC
> 6m	Contact SDCC	Contact SDCC	Contact SDCC
<b>SDCC Minimum Separation Distances from Proposed Building to Water Features</b>			
Water Courses / Rivers	10m from Top of Bank		
Culverts	10m		
<b>SDCC Minimum Separation Distances from Proposed Building to SuDS Features</b>			
Soakaway	5m		
Swales	5m from Top of Bank		
Tree Pits	5m		
Attenuation System	5m from edge of Tank		
Detention Basin	10m from Top of Bank		

The setback distance for foul and watermain should be as per Irish Water Standards. The links attached below provide Irish Water Standard details regarding separation distances to water and wastewater services.

<https://www.water.ie/docs/connections/faqs/Water-Standard-Details.pdf>

<https://www.water.ie/docs/connections/faqs/Wastewater-Standard-Details.pdf>

## SDCC City Edge Section

South Dublin County Council (SDCC) is making this submission in relation to the proposed Tallaght/Clondalkin to City Centre Core Bus Corridor route in the context of the City Edge Project (see <https://cityedge.ie/>).

### City Edge Project Background

The City Edge project is a joint South Dublin County Council (SDCC) / Dublin City Council (DCC) initiative to reimagine the Naas Road, Ballymount and Park West areas in Dublin to create a new urban quarter. Covering 700 hectares, this is one of the largest brownfield regeneration projects in Europe with the potential to deliver 40,000 homes and 75,000 jobs between now and 2070. A non-statutory **Strategic Framework** has been prepared for the area setting out a high level vision and identifying a number of critical infrastructure elements required to support this level of development (see [City-Edge-Strategic-Framework-August-2022-Final.pdf](#) ([cityedge.ie](https://cityedge.ie/))). The City Edge framework is a non-statutory framework and is not part of the development consent assessment process.



Figure 2 City Edge Project area in the context of Dublin City

## Variation to Development Plans

South Dublin County Council intends to propose a Variation to the South Dublin County Development Plan 2022–2028 as part of the second phase of the City Edge project. The purpose of the proposed Variation is to give the provisions of the non-statutory Strategic Framework a statutory basis. SDCC (along with our project partner DCC) has engaged consultants who are currently preparing an evidence base and planning strategy to inform the proposed Variation. As part of this analysis, the urban design and layouts for the districts indicated within the City Edge Strategic Framework will be refined to provide a robust basis for assessing planning proposals and for general future planning. In this context, the Tallaght/Clonsalkin to City Centre CBC proposals have arrived at a crucial time in terms of ensuring that City Edge and Bus Connects are aligned.

## Bus Connects and City Edge – General

South Dublin welcomes the proposals to introduce high quality public transport and safe segregated cycle facilities to the City Edge area via the Bus Connects project. This ties in with the strategic objectives of City Edge to focus on compact growth, active travel, transport orientated development and 15-minute city principles. We would like to ensure that the specific routes are future-proofed and allow for the required level of public transport service provision to coincide with the delivery of new homes and employment within City Edge.

The Bus Connects programme also presents an opportunity to future-proof the proposed bus and cycle routes with high-quality green infrastructure for adaptation to climate change, as well as for biodiversity and visual amenity. It also presents an opportunity to include environmental mitigation measures such as SUDS within the green areas of the design. These measures together will contribute to meeting national and local climate targets.

In the context of the proposed changes associated with Bus Connects that areas will undergo, the general concerns from the perspective of the City Edge project are –

- to ensure that the detailed designs do not negatively impact on the urban design and layout of this new urban quarter;
- to ensure that detailed designs are consistent with providing attractive human-scaled streetscapes and active frontages;
- that adequate and safe provision is made for pedestrians and cyclists and that the principles of universal design are adhered to;

- that greening is facilitated via provision of appropriate green infrastructure such as street trees and SUDS measures for climate change adaptation and mitigation, that tree and green space removal is minimised and that a net green infrastructure gain occurs;
- avoiding heavily-engineered solutions;
- ensuring alignment with other proposed infrastructure including underground utilities, such as the ESB Networks/Eirgrid 'Powering Up Dublin' proposals; and SDCC's Cycle South Dublin proposals.

## **Bus Connects and City Edge – More Detailed Comments**

The Strategic Framework contains a proposed 'inner orbital' public transport route which will follow Kylemore Road and Walkinstown Avenue (see Fig. 2). This has been identified as a portion of the D1/D3 spine and the S4 orbital route and will initially consist of Bus Connects services (with possible future upgrade to light rail). The Strategic Framework envisages a new rail station and transportation interchange at Kylemore bridge where the upgraded Dart + South West line, the planned Luas line to Lucan, and the new Bus Connects services will converge. The NTA has confirmed that a budget has been allocated to Iarnrod Eireann for 2023 to progress the design of this new station. Kylemore bridge will also serve as the location for a new district centre for the City Edge area (see Figs. 1 and 2).

A further transport interchange is proposed at the existing Kylemore Luas stop on the Naas Road, along with a further district centre. A high street along Kylemore Road will link the two district centres/transport interchanges (See Figs. 1 and 2). The proposed Tallaght/Clondalkin to City Centre CBC route is routed through this interchange/district centre, which is welcomed by South Dublin County Council.

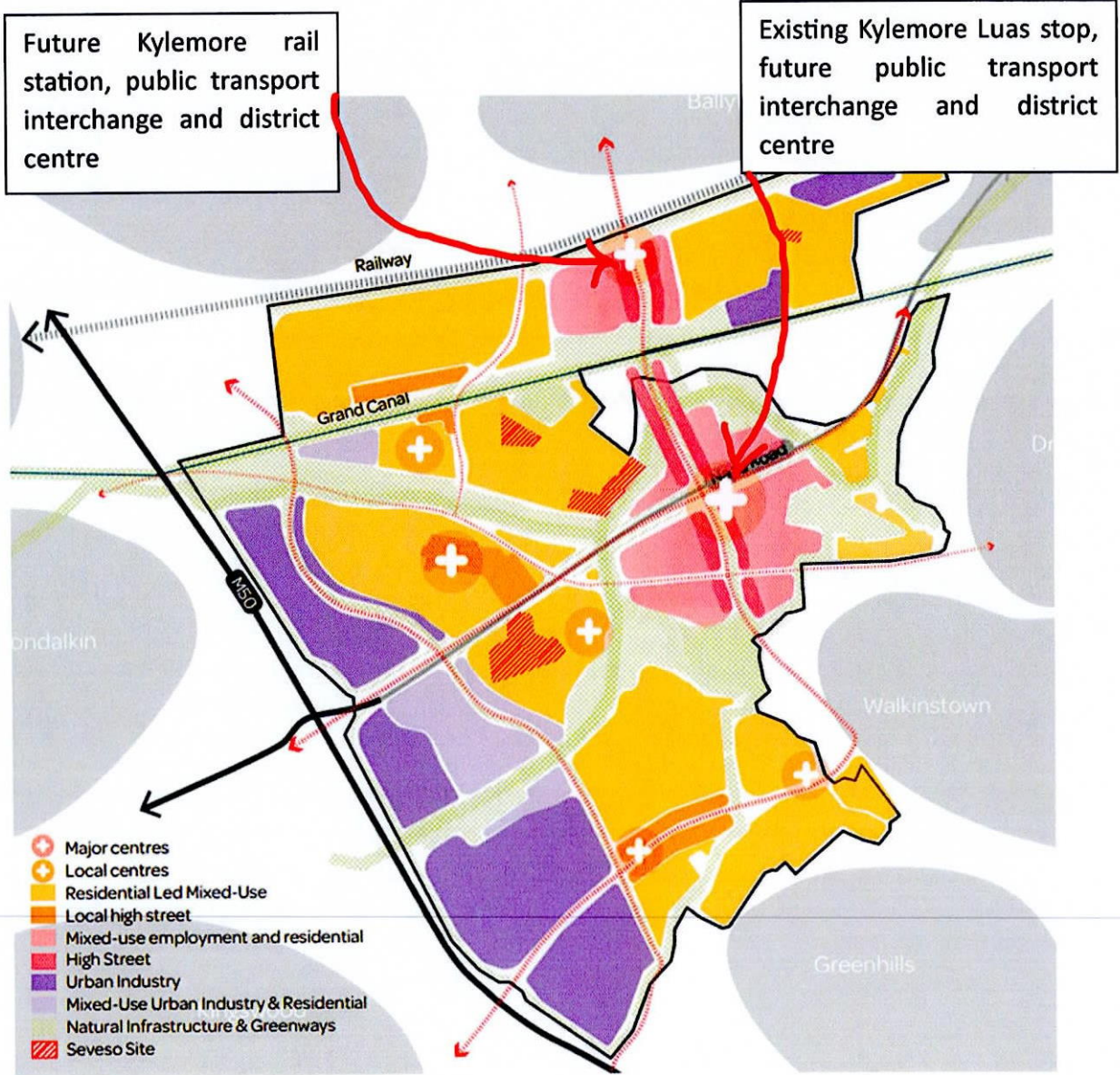


Figure 3 City Edge Indicative Spatial Configuration

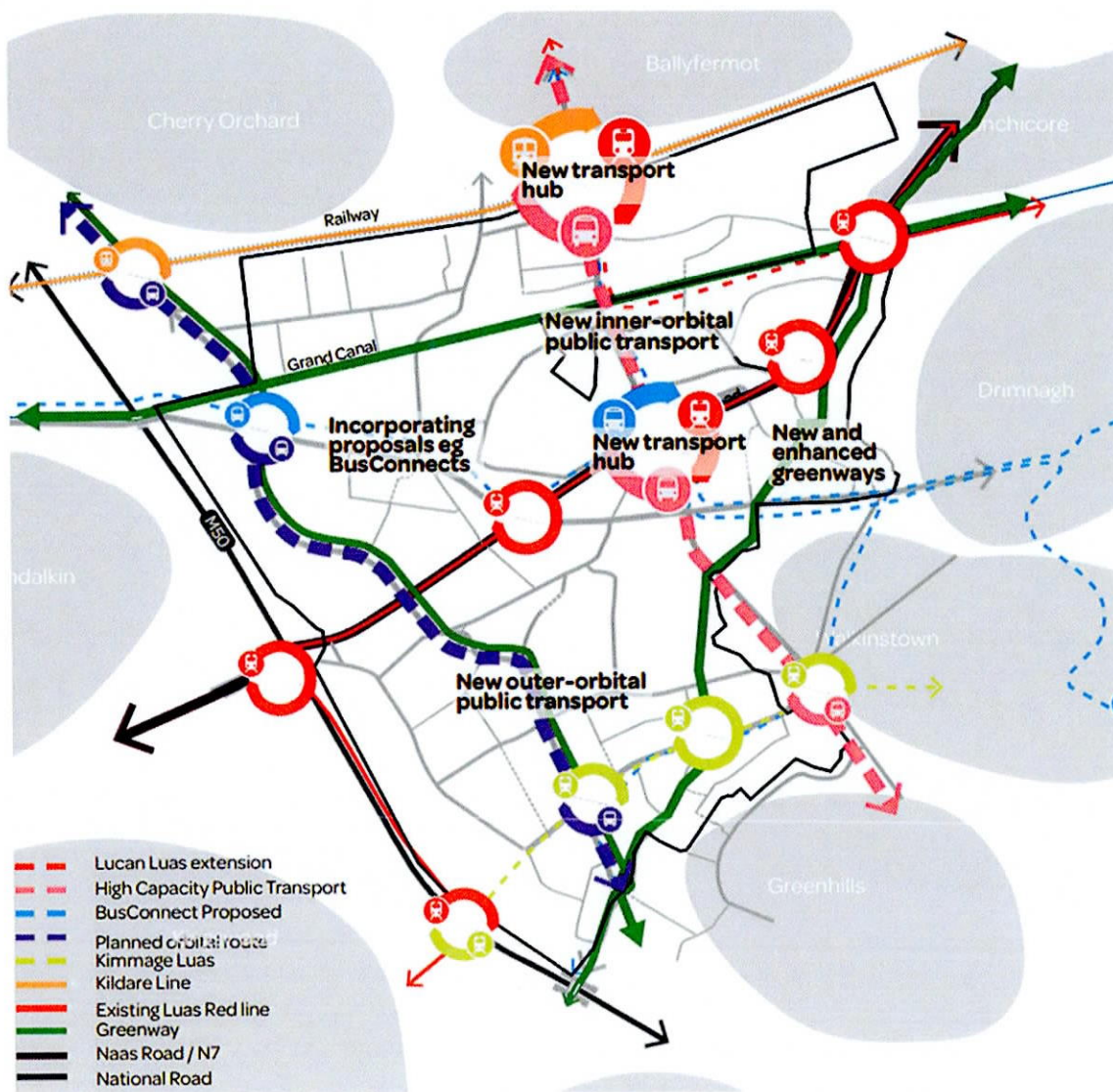


Figure 4 City Edge Strategic Framework Movement Framework

The main roads/streets within the City Edge project area that the Bus Connects routes will traverse through are as follows:

Clondalkin section:

- New Nangor Road
- Naas Road – R810
- Walkinstown Avenue – R112
- Long Mile Road – R110

Tallaght section:

- Greenhills Road – R819
- Ballymount Avenue
- Calmount Road
- Calmount Avenue

Particular elements of the proposals are examined below with commentary on how they may affect the City Edge area along with suggested improvements.

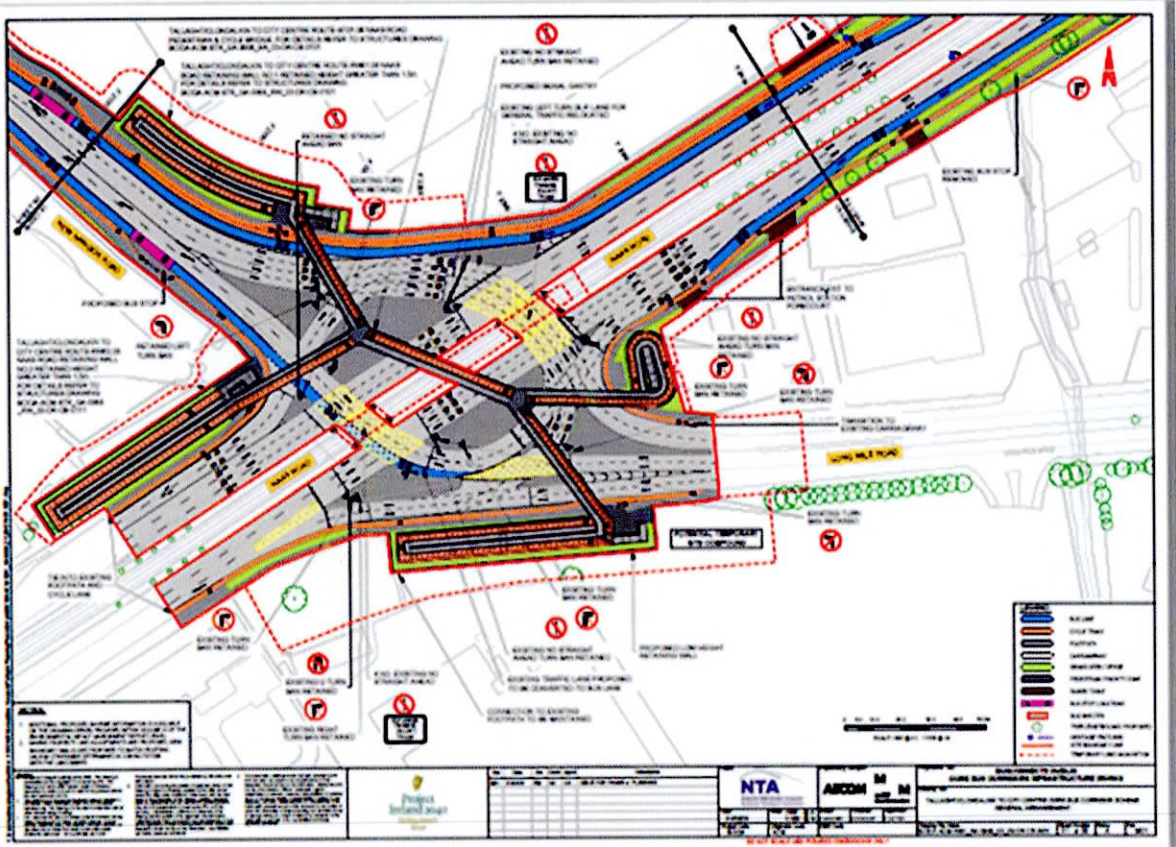


Figure 5

**The Naas Road Bridge:**

South Dublin requests a revisit of the design of the proposed cycle bridge at the intersection of New Nangor Road, Naas Road and Long Mile Road (the ‘Hamburger’ Junction). This junction is a highly visible location, and the functional design of the proposed bridge is a missed opportunity to create a landmark structure that would be a visual focal point for the emerging City Edge area. There is potential for the bridge to be a gateway structure that sets a design standard for the City Edge area. The bridge should create a strong visual impact, contribute to the place making of the area, create safe linkages between the two areas of the Naas Road and allow for efficient access across the Long Mile Road. SDCC acknowledge the important function of the bridge and welcome the inclusion, however, the current design responds to the current context and does not acknowledge the City Edge Strategic Framework context. SDCC request further consideration of the design and visual appearance of the bridge through condition with finishes, lighting and design to be agreed.

In the event of a grant of planning permission, a condition should be applied seeking the detailed design and materials for the proposed bridge and approaches should be agreed with the local planning authority.

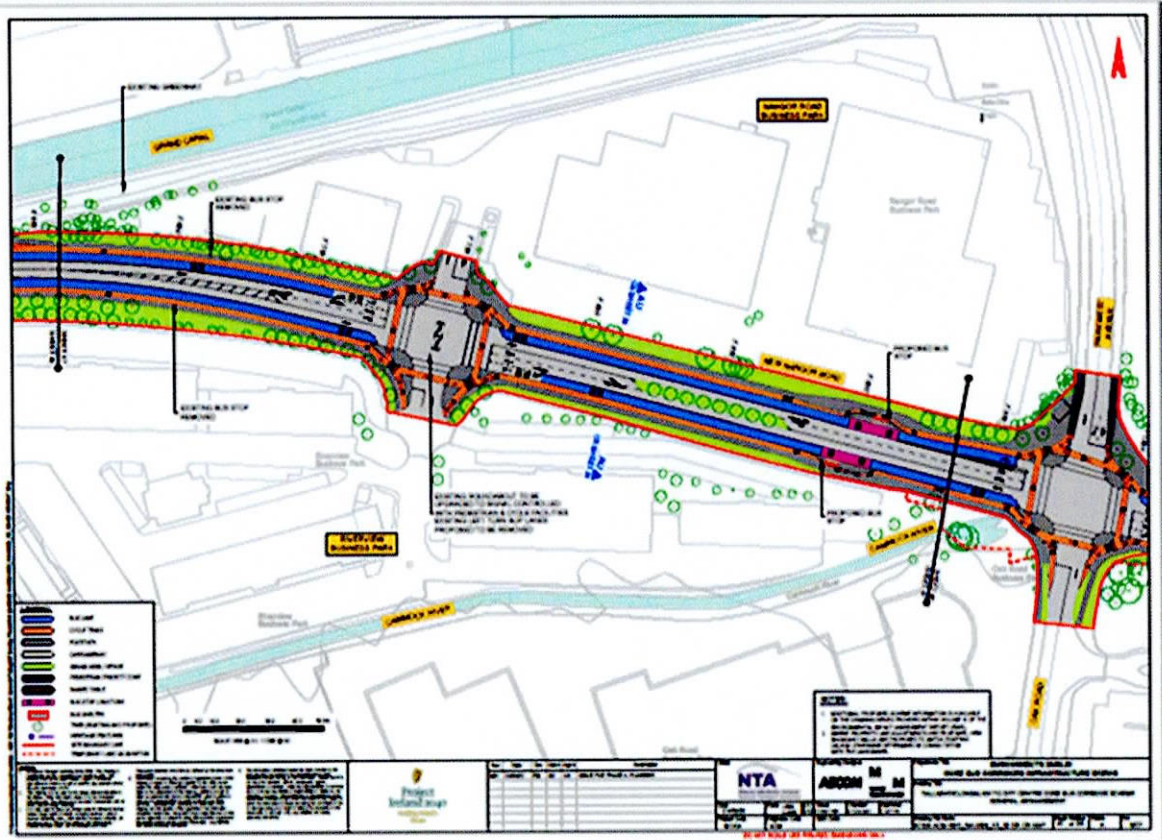


Figure 6

**New Nangor Road/Oak Road/Park West Avenue:**

Oak Road forms part of a proposed north-south ‘outer orbital’ public transport route in the City Edge Strategic Framework. It should be noted in the design of this junction/route that it will require to be capable of taking more extensive traffic in the future.



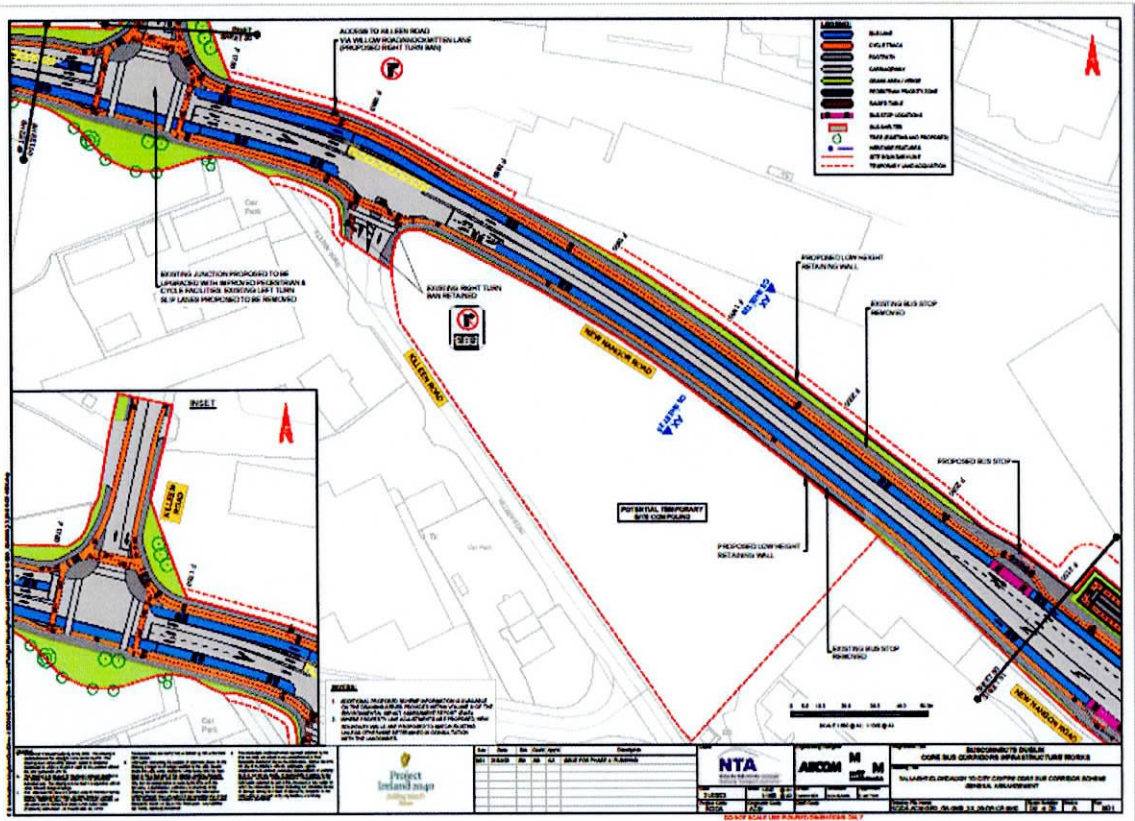


Figure 7

### Killeen Road/New Nangor Road

The design as proposed is hard in appearance. More greening is encouraged along the Nangor Road to soften this visually.

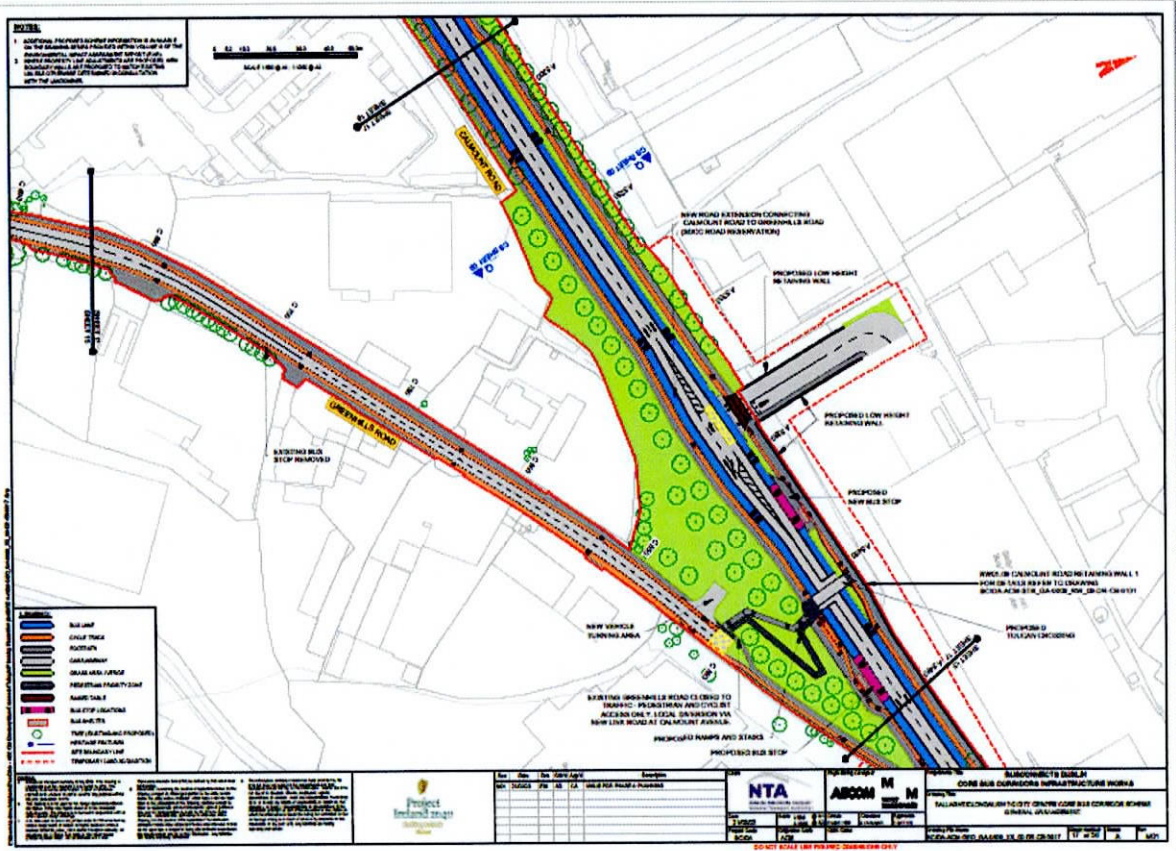


Figure 8

### Calmount Road:

The proposal to route the Core Bus Corridor along Calmount Road is welcome in the context of this being identified as a future local high street within the City Edge Strategic Framework. However, SDCC would encourage the provision of more greening and SUDS within the design. As well as revisiting the specification for the connection to enhance outcomes. Please also note comments previously set out in the traffic sections. In the event of a grant of planning permission the detail design and layout of this green space at the junction of Calmount Road and Greenhills Road should be agreed with the local authority to address detailed concerns over the active travel access between both roads and the quality of the green open space and its maintenance into the future.

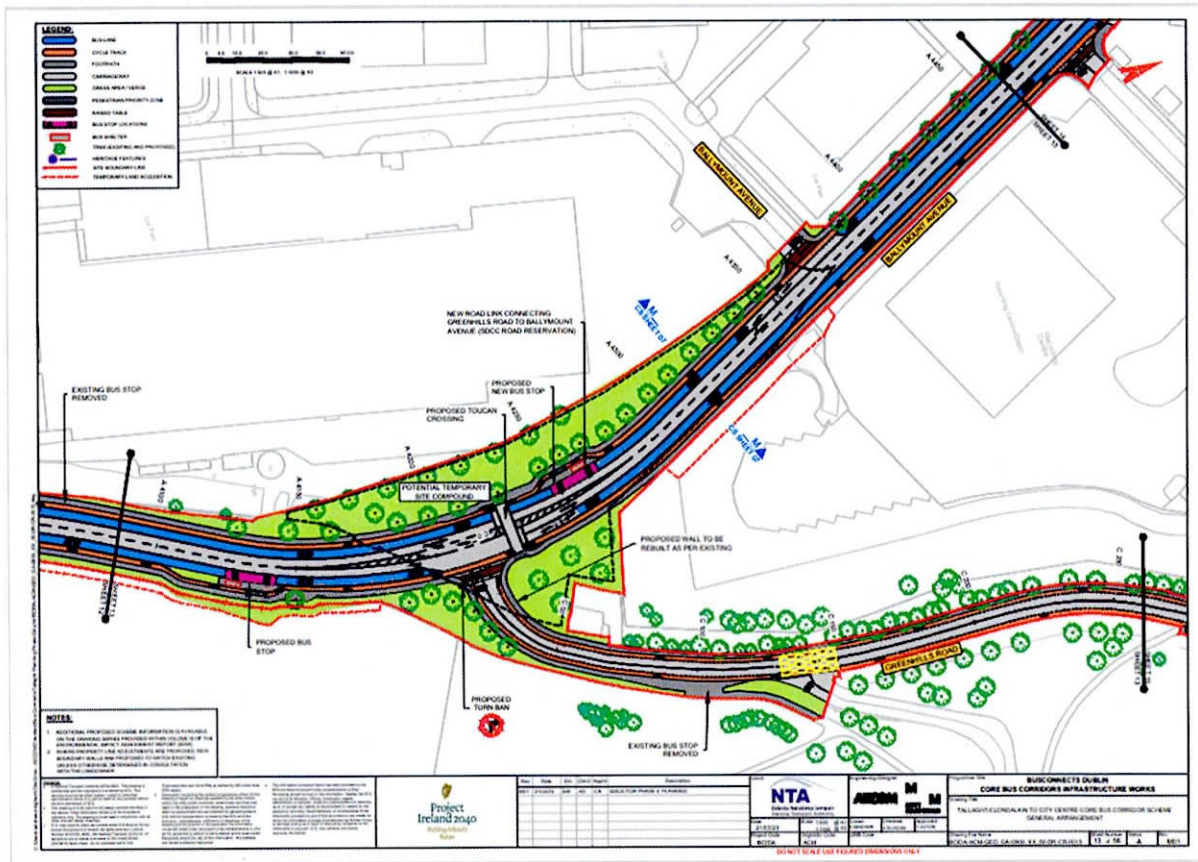


Figure 9

**Greenhills Road/Ballymount Avenue:**

Protection of the extensive swathe of trees along Greenhills Road and minimising of tree removal is encouraged. The opportunity to provide more street trees should be taken.

Scope for reduction in land-take into Tymons Park by re-examining the sweep and width of the carriageway.

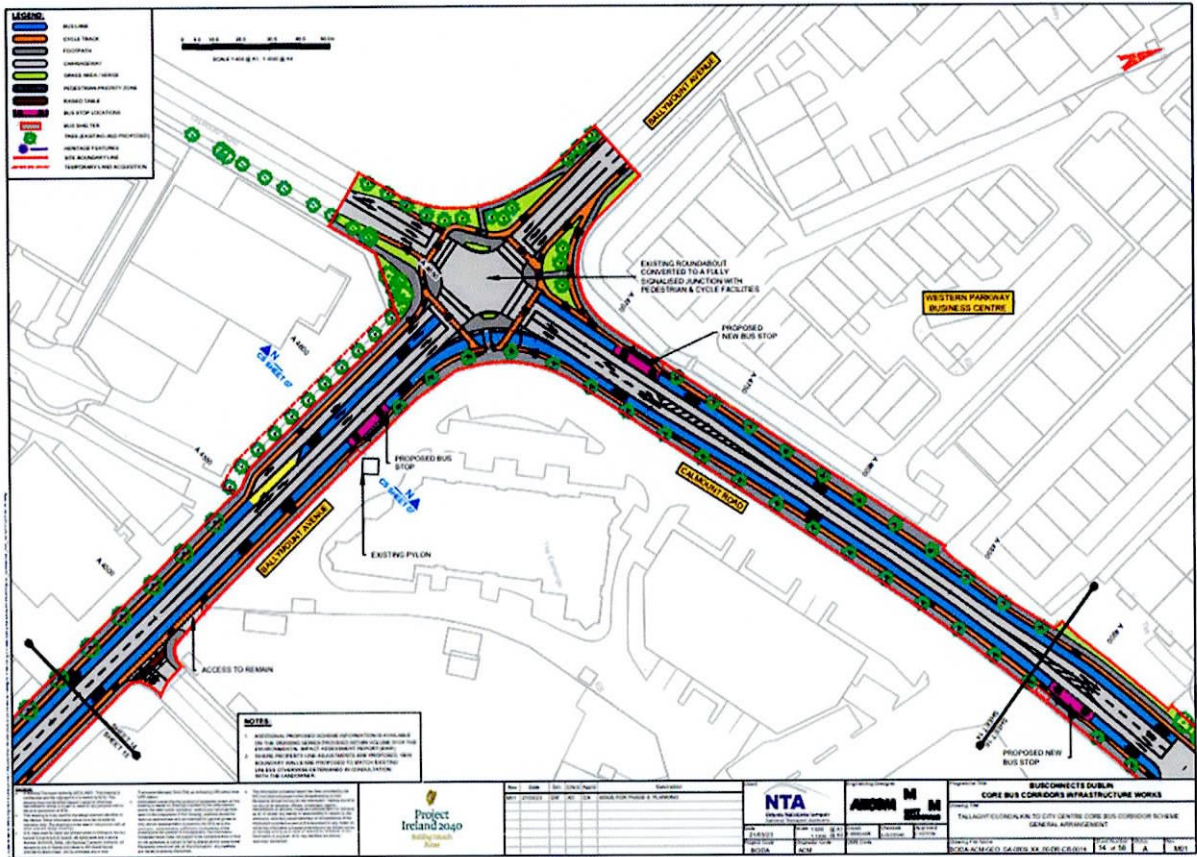


Figure 10

### Ballymount Avenue/Calmount Road

The opportunity for greening should be explored along the eastern side of Ballymount Road.

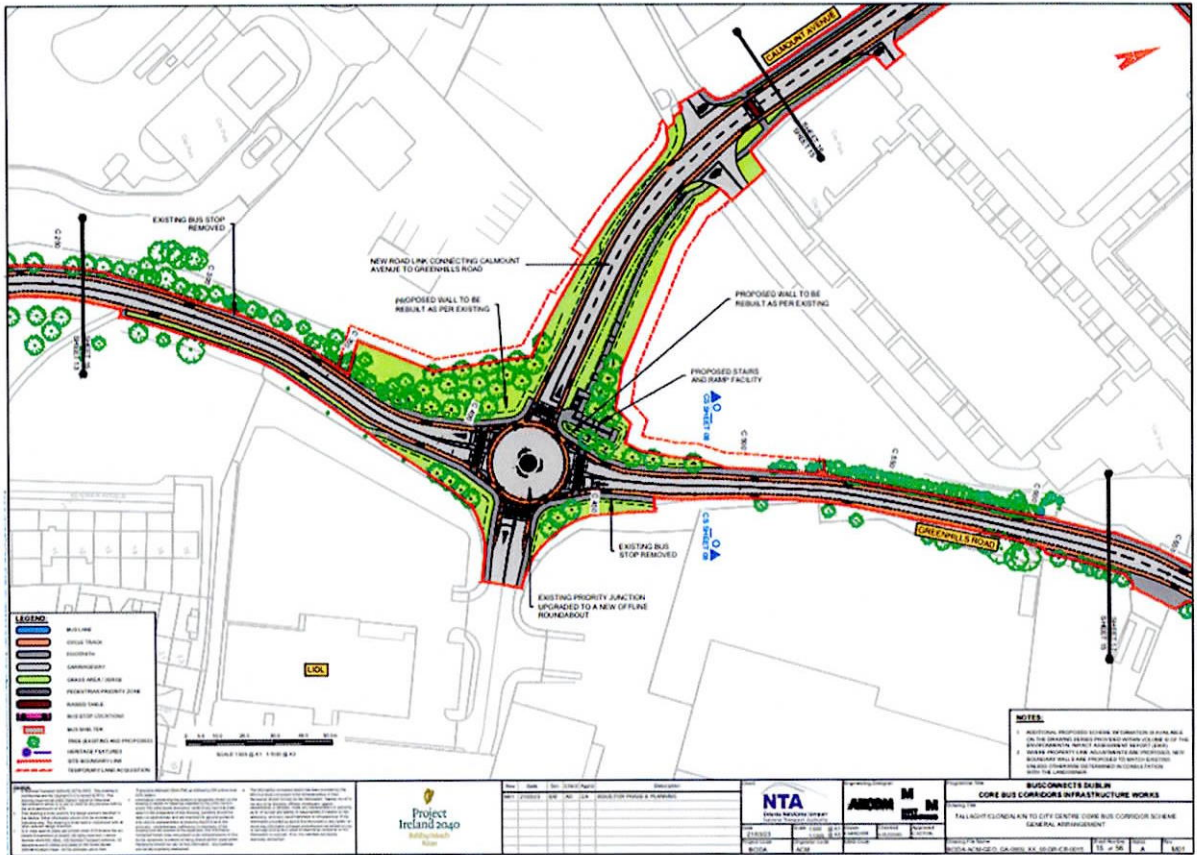


Figure 11

**Calmount Avenue/ Greenhills Road**

SDCC welcomes the connecting up of Calmount Avenue to create a through-road linking to the future Calmount Local High Street. Again, tree removal in this area should be minimised and the proposals should result in a net greening.

## Conclusion:

SDCC welcomes the proposed Tallaght/Clondalkin to City Centre Core Bus Corridor route which will provide additional high quality public transport that will serve Tallaght Urban Village, the redevelopment of the City Edge regeneration area and a wide range of other established neighbourhoods. However, as set out above, we would take the opportunity to comment on a number of **general issues** which can be summarised as follows:

1. Avoiding an over-engineered approach which can create a hostile environment for active travel, can have negative visual impacts and can make the creation of a human-scaled streetscape difficult;
2. Adequate provision for walking and cycling on attractive and safe routes including adherence to the principles of universal design;
3. Ensuring there is adequate greening including –
  - (a) Avoid removal of trees (acknowledge some are low quality – category U) and green areas
  - (b) Where unavoidable or trees are low quality, replacement planting and greening to result in an overall net gain. Supplementary street-tree planning is warranted along route
  - (c) Supplementary nature-based SUDS features are warranted along route;
4. Tying in with other proposed infrastructure including underground utilities, such as the ESB Networks/Eirgrid 'Powering Up Dublin' proposals; and SDCC's Cycle South Dublin proposals.
5. Consideration to be given to operation of construction compounds on SDCC lands by agreement rather than by temporary CPO. SDCC is best placed to manage issues around these compounds because of its local knowledge and existing relationship with local communities. **An Bord Pleanála is advised the SDCC hereby offers its consent for the temporary use of its lands as construction compounds as identified and delineated to the submitted drawings by the NTA or its agents for these delivery of these proposals by agreement.**

With respect to the **specific proposals**, we would summarise our concerns as follows:

1. The scheme will remove a recent Council delivered area of high-quality public realm at the junction of Old Greenhills Road and the Greenhills Road. To offset this permanent loss, it is recommended a bespoke and high-quality public realm improvement scheme be prepared and delivered by the NTA along the Old Greenhills Road up to Tallaght Village with detailing around this to be agreed with SDCC. This is warranted (i) to offset SDCC's loss and in light of (ii) the standing of Tallaght Village in the settlement hierarchy of SDCC's core strategy (County Development Plan 2022-2028), as a Major Town Centre in the Regional Retail Hierarchy (Regional Spatial Economic Strategy 2019-31) (iii) its special character as an Architectural Conservation Area (regional importance) and (iv) special character of protected structures of high architectural order such as The Priory in Tallaght Village.
2. In the event of a grant of planning permission, a condition should be secured to ensure that the detailed design of the bus interchange in Tallaght Town Centre is properly aligned and interfaces with the design of the new public plaza scheme that SDCC are currently on site delivering in the Town Centre.
3. The scheme will result in the loss of some public realm works near Bancroft Park by permanent CPO. To offset this loss and the amenities available to local residents, it is recommended that some additional enhancement works be detailed and carried out at Bancroft Park following its use as a compound. A condition requiring the submission of a landscaping enhancement plan for Bancroft Park and its delivery for agreement with SDCC is warranted to offset loss of public realm works nearby by permanent CPO.
4. In relation to construction compounds, SDCC has particular concerns in relation to those proposed to (i) Bancroft Park (community concerns) and (ii) Tymons Park (ecological concerns). The Compounds in Tymon Park should be removed or minimised to address potential environmental concerns. The use of temporary work compounds should be progressed by agreement with SDCC instead of temporary CPO. If this is not practical, then SDCC requests a condition requiring additional detailing around the siting, layout, duration of use, reinstatement and handback for agreement with SDCC as part of this determination.
5. SDCC requests a planning condition be secured on the detailed design of the proposed cycle bridge and approaches at the intersection of New Nangor Road, Naas Road and Long Mile Road (the 'Hamburger' Junction) for agreement with the local authority. There is potential for the bridge to be a gateway structure that sets a design standard for the City Edge area. The bridge should create a strong visual impact, contribute to the place-making of the area, create safe linkages between the two areas of the Naas Road and allow for efficient access across the Long Mile Road. SDCC acknowledge the important function of the bridge and welcomes the inclusion, however, the current design responds to the current context and does not acknowledge the City Edge Strategic Framework context. SDCC request the re-design of the bridge by way of a compliance condition following consultation with SDCC.

6. SDCC welcomes the connecting up of Calmount Avenue to create a through-road linking to the future Calmount Local High Street. The design of the green space between the extended Calmount Road and the existing Greenhills road needs more consideration and better resolved design outcome in light of its planned function within the CityEdge urban quarter. Compliance condition requiring the following is requested:
  - a. A landscaping plan should be provided for this new green space demonstrating area of planting, nature-based SuDs features where desire and ped/cycle movement routes are, and how the open space will interface with the sizeable development site (Chadwicks) to the south of the green space.
  - b. cycle bridge. As proposed structure appears of standard engineering specification, uplift in design quality and appearance is warranted.
7. Oak Road, a proposed 'outer orbital' public transport route in the City Edge Strategic Framework, would be required to be capable of taking more extensive traffic in Future, which should be borne in mind in the design of the junction with the New Nangor Road.
8. More green infrastructure , tree planting and hedge retention should be secured along the full length of the route in particular to avoid streets where no trees are planted and to ensure mitigation where trees and hedgerows are to be removed..
9. More natural based SuDs should be secured along the full length of the route
10. On Greenhills Road/Ballymount Avenue, protection of the extensive swathe of trees along Greenhills Road and minimising of tree removal is encouraged, while the opportunity to provide more street trees should be taken. It is suggested the sweep and extent of the carriageway encroaching into Tymon Park be reduced, which could be done within the red line of the planning application. This could be secured by planning condition and would help to reduce the impact within Tymon Park.
11. It will be important to ensure that all necessary environmental and ecological surveys have been completed to ensure a full assessment of the planning application to be completed.
12. The opportunity for greening should be explored along the eastern side of Ballymount Avenue.
13. Safety and method statements sought by compliance in relation to protected structures and ACAs as referenced by the Architectural Conservation Officer.