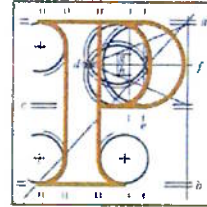


**Our Case Number: ABP-317679-23**



**An  
Bord  
Pleanála**

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

**Date:** 11 October 2023

**Re:** Ringsend to City Centre Core Bus Corridor Scheme.  
Ringsend to City Centre, Co. Dublin.

Dear Sir / Madam,

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

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

If you have any queries in the mean time, please contact the undersigned officer of the Board at [laps@pleanala.ie](mailto:laps@pleanala.ie)

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

HA02

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## Niamh Thornton

---

**From:** Fiona Brady <fiona.brady@dublincity.ie>  
**Sent:** Tuesday 10 October 2023 14:08  
**To:** SIDS; Niamh Thornton  
**Subject:** FW: Bus Connects Dublin - Ringsend to City Centre BusConnects Report ABP - 317679-23  
**Attachments:** Ringsend to City Centre Busconnects Report.docx

To whom it may concern,

Please see attached Submission from Dublin City Council Chief Executive to An Bord Pleanála in relation to the National Transport Authority's BusConnects Dublin Ringsend to City Centre Core Bus Corridor Scheme.

Please acknowledge receipt of this submission at your earliest convenience.

Regards  
Fiona Brady  
On behalf of Deirdre Scully

Fiona Brady  
Staff Officer  
An Roinn Pleanála & Forbairt Maoine  
Comhairle Cathrach Bhaile Átha Cliath, Bloc 4, Urlár 3, Oifigí na Cathrach, An Ché Adhmaid, Baile Átha Cliath 8, Éire  
T 00 353 (0) 1 222 2009 Fax: 012222271, email: [fiona.brady@dublincity.ie](mailto:fiona.brady@dublincity.ie)

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



**Written Submission from Dublin City  
Council Chief Executive  
to An Bord Pleanála  
in relation to  
the National Transport Authority's  
BusConnects Dublin – Ringsend to City Centre Core Bus Corridor Scheme  
An Bord Pleanála Ref. 317679-23**

- 1.0 Application – Ringsend to City Centre Core Bus Corridor Scheme**
- 1.1 Scope of Report**
- 2.0 Description of the Proposed Development**
- 2.1 Relevant Planning History**
- 2.2 Policy Context**
- 2.3 Planning Assessment**
- 2.3.1 Planning Policy**
- 2.3.2 Environmental Impact Assessment Report (EIAR)**
- 2.3.3 Natura 2000**
- 2.3.4 Zoning and other designations**
- 2.3.5 Impact on Amenity**
- 2.4. Department Reports**
- 2.4.1 Forward Planning Section Comments**
- 2.4.2 Environment and Transportation Department Comments**
- 2.4.2.1 General Comments**
- 2.4.2.2 Traffic Division Comments**
- 2.4.2.3 Roads Division Comments**
- 2.4.2.4 Environmental Protection Division**
- 2.4.3 Archaeology Section Comments**
- 2.4.4 Conservation Section Comments**
- 2.4.5 City Architects Division Comments**
- 2.4.6 City Parks, Biodiversity and Landscape Division Comments**
- 2.5 Conclusion**

#### **Appendix 1 – Recommended Conditions**

## **1.0 Ringsend to City Centre Core Bus Corridor Scheme**

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

### **1.1 Scope of Report**

In accordance with Section 51 (3)(b) of the Roads Act 1993 (as amended), this submission sets out the views of Dublin City Council (a prescribed body), on the Ringsend 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 Bus Connects Project. The purpose of this team 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 Bus Connects Programme.

This dedicated Bus Connects Liaison Team 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.

The BusConnects programme seeks to greatly improve bus services in Irish cities, including Dublin, so that journeys by bus will be fast, reliable, punctual, convenient and affordable. Bus Connects is part of the Government's policy to improve public transport and address climate change in Dublin and other cities. BusConnects is included as a specific policy objective of Project Ireland 2040 – The National Development Plan 2018 – 2027 (Government of Ireland 2018); and the Climate Action Plan 2021 (Government of Ireland 2021b).

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

The Proposed Scheme has an overall length of approximately 4.3km (2 x 1.6km along the River Liffey Quays and 1.1km cycle route through Ringsend and Irishtown to Sean Moore Road) and is routed along the north and south quays of the River Liffey, linking the city centre with the Docklands and an onward cycling connection to Ringsend and Irishtown.

The Proposed Scheme includes priority for buses along the entire length of the north quays from Talbot Memorial Bridge to the 3Arena at the Tom Clarke East Link Bridge, consisting of dedicated bus lanes in both directions, which will require the relocation of both pairs of Scherzer Bridges along the north quays. Bus priority will also be achieved on the south quays through the provision a new opening bridge across the River Dodder (via the Dodder Public Transport Opening Bridge (DPTOB)) as well as the provision of intermittent sections of bus lane to ensure bus priority on the approach to all major junctions. Segregated two-way cycle tracks will be provided along the quaysides (Campshires) on both sides of the River Liffey. A continuation of the two-way cycle route on the south quays will extend through Ringsend and Irishtown towards Sandymount Strand and the Poolbeg peninsula. The route will run via quiet streets at Pembroke Cottages, across Cambridge Road, then through Ringsend Park as a shared path with pedestrian priority, and a cycle track along the northern side of Strand Street and Pembroke Street in Irishtown to the junction of Sean Moore Road and Beach Road. A spur cycle route will be provided towards the Poolbeg Strategic Development Zone (SDZ) lands via Irishtown Stadium and Bremen Road. Shared use symbols will also be installed along York Road and Pigeon House Road to provide a second alternative route towards the Poolbeg SDZ lands.

Pedestrian facilities will be upgraded, and additional controlled and uncontrolled crossings will be provided at side roads, road crossings, and at junctions. In addition, urban realm works will be undertaken at key locations with higher quality materials, planting and street furniture provided to enhance the pedestrian experience. The Proposed Scheme includes a local modification to Mayor Street at Spencer Dock. In order to accommodate proposed turning movement restrictions at the Guild Street / Samuel Beckett Bridge junction for the purposes of provided enhanced bus, cycle and pedestrian priority, it is proposed to open an eastbound traffic lane north of the LUAS between the National Convention Centre Car Park and Park Lane. This will facilitate traffic exiting the car park towards the M50 Port Tunnel.

The Proposed Scheme has been developed to ensure that the principles of universal design are integrated fully in the design, providing access for all users, and eliminating barriers to disabled people. 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 as a result of the Proposed Scheme are the following:

- The number of pedestrian signal crossings will increase from 37 to 50 as a result of the Proposed Scheme;
- The proportion of segregated cycle facilities will increase from 82% on the existing corridor to 93% on the Proposed Scheme;
- The proportion of the route having bus priority measures will increase from 1.1km to 5.7km an increase of 375%.

The Proposed Scheme is described in the following geographical sections:

- Section 1: Talbot Memorial Bridge to Tom Clarke East Link Bridge;
- Section 2: Dodder Public Transport Opening Bridge (DPTOB);
- Section 3: Tom Clarke East Link Bridge to Sean Moore Road.

### **Section 1: Talbot Memorial Bridge to Tom Clarke East Link Bridge**

This section will commence at the Talbot Memorial Bridge and proceed eastwards along the north and south quays and will conclude on either side of the Tom Clarke East Link Bridge.

Multiple structures, are proposed along this section to accommodate the Proposed Scheme. The historic Scherzer Bridges at George's Dock and Royal canal will be relocated to either side of the carriageway to facilitate the addition of bus lanes, which two boardwalk structures along the R801 on Custom House Quay and North Wall Quay will be constructed to assist with facilitating pedestrian movement. On the south quays the Dodder Bridge will be constructed across the mouth of the River Dodder, at its confluence with the River Liffey, to connect Sir. John Rogerson's Quay to East Link Road and York Road.

Temporary land acquisition is required for the construction compounds at both sets of Scherzer Bridges as well as along part of Sit John Rogerson's Quay to facilitate works. These lands will be reinstated in line with existing conditions and/or urban realm improvements following the completion of works. Permanent land acquisition will be required at various locations, including at the locations of the relocated Scherzer Bridges and extents of the improved pedestrian and cycling facilities along the north and south quays. On this section of the Proposed Scheme the submitted documentation states there are 20 bus stops proposed, however, there are only 19 proposed, 7 are island bus stops, 3 layby bus stops and 9 are inline bus stops. The scheme will provide 100% cycling priority in both directions along this section of the proposal and a loss of 80 on street parking spaces, of which 8 are taxi spaces, 2 are disabled parking spaces, and 50 pay and display spaces. It will also result in the loss of 9 loading bays.

This section of the Proposed Scheme involves the following major structures:



- George's Dock Replacement Carriageway Bridge – 13m wide and 17.5m long single span concrete carriageway bridge over the entry/exit channel and associated lock to George's Dock. The existing steel opening Scherzer bridges will be relocated to each side and renovated.
- Custom House Quay Boardwalk – 130m long and 4m wide steel frame with wooden decking, supported by steel beams anchored into proposed building foundation
- North Wall Quay Boardwalk – 65m long and 6m wide steel substructure with wooden decking supported by steel struts anchored into existing quay wall
- Spencer Dock Replacement Carriageway Bridge 0 13m wide and 13.5m long single span concrete carriageway bridge over the entry/exit channel and associated lock to Geogre's Dock. The existing steel opening Scherzer bridges will be relocated to each side and renovated.

## **Section 2: River Dodder Public Transport Bridge (DPTOB)**

This proposed section of the scheme involves the construction of the approach roads associated with the bridge, a new control building for operating the bridge, a new club house and facilities for St. Patrick's Rowing Club, provision of a new ESB substation, reclamation of land to the west of Tom Clarke East Link Bridge and landscaping the area between York Road/Thorncastle Street and the R131 Regional Road over the extent of this section of the Proposed Scheme.

As mentioned previously this bridge is to facilitate public transport only and therefore only bus lanes are accommodated on the bridge. A two way-segregated cycleway is proposed alongside the eastbound carriageway on the north side of the bridge, a continuation of the two way cycleway proposed along the length of the quays.

The proposed bridge will be a 96m long three span steel bridge which will span from Sir John Rogerson's Quay (adjacent to the Capital Dock development) to the R131 Regional Road adjacent to Tom Clarke East Link Bridge. The bridge deck will be 20.7m wide and will carry a two lane carriageway, cycleway and footpaths on either side. It will include an opening section adjacent to Sir John Rogerson's Quay which will facilitate the navigation of larger vessels between the River Liffey and River Dodder/Grand Canal Basin. When the bridge is lowered it will have a 2.7m high vertical clearance over the Dodder navigational channel and when it is raised fully to 70degree rotation, there will be an unlimited vertical clearance with a 19m wide navigational channel.

To the east, the road will climb up to the proposed bridge on a formation retained by principal back-to-back retaining walls on pad foundations. To the west, an approximately 19m long approach ramp will run onto Sir John Rogerson's Quay, made up of retaining walls and wingwalls.

The proposed St. Patrick's Rowing Club building will also contain the bridge control room. It is a proposed two storey structure situated to the west of the bridge immediately adjacent to the River Liffey on reclaimed land. In addition to boat storage the building will contain a general store, kitchen and changing facilities, an office, function room and gym. The proposed building is 12m wide, 37m long and 13m high. Along the northern part of the building, an external observation terrace will overlook the river. It is also proposed to construct a new jetty and public slip way to the north of the building to facilitate access to the river.

This section of the Proposed Scheme requires temporary land acquisition for construction compounds at either side of the bridge on Sir John Rogerson's Quay and Thorncastle Street/York Road. Permanent land acquisition is required from either side of the bridge from Capital Dock Park on the western side and Thorncastle Street/York Road and the adjacent amenity area on the eastern side.

## **Section 3: Tom Clarke East Link Bridge to Sean Moore Road.**

This section of the Proposed Scheme will commence from the southern end of the Tom Clarke East Link Bridge at the junction with the proposed Dodder Bridge and will proceed to the junction of R131 Sean Moore Road and R802 Beach Road. No new or upgraded bus facilities will be provided in this section of the scheme as it is intended that buses will use the existing facilities along the East Link Road to R131 Sean Moore Road. The provision of new and upgraded cycling facilities are the main works of concern in this section of the scheme.

This section of the scheme will comprise the following works along several cycle routes:

- From the southern end of the Tom Clarke East Link Bridge at the junction of the proposed DPTOB, a two way cycle track will extend for 100m to York Road.
- From York Road the cycle route will follow quiet local streets at Pembroke Cottages and Cambridge Park to Ringsend Park, where the existing footpath along the western boundary of the park will be improved to a 4m wide shared path with pedestrian priority;
- From the southern end of Ringsend Park, a segregated cycle track will be provided along Strand Street, Pembroke Street, and R802 Beach Road to R131 Sean Moore Road;
- A branch cycle route from the southern end of Ringsend Park will skirt around Irishtown Stadium to provide a direct connection to the Poolbeg SDZ lands via Bremen Road; and
- A branch cycle route will share the quiet residential streets along York Road and Pigeon House Road to Poolbeg, where Quiet Street Treatment will

Over the proposed route the scheme requires land acquisition from 8 commercial properties and non-residential land and local authority property. There is one building proposed to be demolished as part of the scheme, St. Patrick's Rowing Club clubhouse. Mitigation accommodation works are proposed in the affected locations including reconstruction of boundary walls and fences as required.

The construction phase for the Proposed Scheme is anticipated to take approximately 30 months to complete and will be based on individual sectional completions that will have shorter individual durations.

Four Construction Compounds will be located at the following sites within Dublin City Council's functional area:

- Construction Compound R1: located along Custom House Quay, at George's Dock, north of the existing Scherzer Bridges, either side of the George's Dock culvert and across the culvert. The area of the compound will be approximately 860sqm and 770sqm.
- Construction Compound R2 will be located along North Wall Quay at Spencer Dock, north of the existing Scherzer Bridges. The area of the compound will be approximately 400sqm and 360sqm.
- Construction Compound R3 will be located at the end of Sir John Rogerson's Quay and will be split into two separate construction compounds (R3a (1,940sqm) and R3b (1,750sqm)) R3a will be used to complete the works along the south quays and R3b will be used to complete the works at the Dodder Bridge.
- Construction Compound R4 will be located southwest of the Tom Clarke East Link Bridge. The layout and boundary of this compound will change throughout the construction programme of the Dodder Bridge. Whilst reclamation works, construction of the new St. Patrick's Rowing Club building, and demolition of the old club house building are underway, a smaller compound will be established (850sqm) and once these works are completed the compound will increase to 2,490sqm.

A Construction Environmental Management Plan and a Construction Travel 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 Pleanáia and constructing the Proposed Scheme (if approved).

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

An EIAR has been submitted as part of the application. The Board is the competent authority, and the assessment of the EIAR is a matter for the Board.

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

### **2.1 Relevant Planning History**

Appendix A2.1 of the EIAR refers to significant planning applications granted permission within the last 10 years along and adjacent to the route. The appendix refers to five applications of note which are located adjacent to the scheme:

- SHD355219 - An application for a Strategic Housing Development City Block 2, Spencer Dock, Site bound by Sheriff Street Upper to the north, Mayor Street Upper to the south, New Wapping Street to the east and a development site to the west Dublin 1 (ABP planning reference 305219) was granted in 2020;
- SHD308827 - An application for Strategic Housing Development Lands at Castleforbes Business Park, Sheriff Street Upper and East Road, Dublin 1. (ABP planning reference 308827) was granted in 2021;
- SHD310299 - An Application for Strategic Housing Development Maxol Filling Station and a vacant motor sales/service garage (formerly Michael Grant Motors), Beach Road, Dublin 4. (ABP planning reference 310299) was granted in 2021;
- PWSZ3207/21 - Permission for development for a mixed use development on a site of 15.3 hectares (including some 0.2 hectares of public domain on Sean Moore Road and the junction with Pine Road), focused primarily, but not exclusively, on a net site area of 2.4 hectares (identified as within the A3 Lands) in the Poolbeg West Strategic Development Zone Planning Scheme (April 2019). Decision Granted; and
- PWSZ3406/22 - Permission for development for a mixed use development (referred to as Phase 1B) on the site of 15.06 hectares including lands known as the Former Irish Glass Bottle & Fabrizia Sites, Poolbeg West, Dublin 4, focused primarily, but not exclusively, on a net site area of 0.76 hectares (identified as within the A3 Lands) in the Poolbeg West Strategic Development Zone (SDZ) Planning Scheme (April 2019). Decision granted.

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

The City Development Plan is the statutory planning context for the assessment of development proposals. 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 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 a 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.

Dublin City Council (DCC) 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 Development Plan 'Sustainable Movement and Transport' sets out DCC policies and objectives which are relevant to Bus Connects. For convenience, relevant policies and objectives are quoted hereunder:

#### **Movement**

**SMT1 Modal Shift and Compact Growth** *To continue to promote modal shift from private car use towards increased use of more sustainable forms of transport such as active mobility and public transport, and to work with the National Transport Authority (NTA), Transport Infrastructure Ireland (TII) and other transport agencies in progressing an integrated set of transport objectives to achieve compact growth.*

**SMT3 Integrated Transport Network** *To support and promote the sustainability principles set out in National and Regional documents to ensure the creation of an integrated transport network that services the needs of communities and businesses of Dublin City and the region.*

**SMT4 Integration of Public Transport Services and Development** *To support and encourage intensification and mixed-use development along public transport corridors and to ensure the integration of high quality permeability links and public realm in tandem with the delivery of public transport services, to create attractive, liveable and high quality urban places.*

**SMT8 Public Realm Enhancements** *To support public realm enhancements that contribute to place making and liveability and which prioritise pedestrians in accordance with Dublin City Council's Public Realm Strategy ('Your City – Your Space'), the Public Realm Masterplan for the City Core (The Heart of the City), the Grafton Street Quarter Public Realm Plan and forthcoming public realm plans such as those for the Parnell Square Cultural Quarter Development and the City Markets Area.*

**SMT01 Transition to More Sustainable Travel Modes** To achieve and monitor a transition to more sustainable travel modes including walking, cycling and public transport over the lifetime of the development plan, in line with the city mode share targets of 26% walking/cycling/micro mobility; 57% public transport (bus/rail/Luas); and 17% private (car/van/HGV/motorcycle).

**SMT02 Improving the Pedestrian Network** To improve the pedestrian network, and prioritise measures such as the removal of slip lanes, the introduction of tactile paving, ramps, raised tables and kerb dishing at appropriate locations, including pedestrian crossings, street junctions, taxi ranks, bus stops and rail platforms in order to optimise safe accessibility for all users.

**SMT027 Road, Street and Bridge Scheme** To initiate and/or implement the following street/road schemes and bridges within the six year period of the development plan, subject to availability of funding and environmental requirements and compliance with the 'Principles of Road development' set out in the NTA Greater Dublin Area Transport Strategy ....

Bridges:

- *Dodder Public Transport Bridge, linked with BusConnects 16 proposals –Map E*
- *Bridge from North Wall Quay at Point Depot (Point Bridge) and the widening of Tom Clarke Bridge, improve pedestrian and cycling facilities at the crossing point as well as accommodating additional public transport routes in conjunction with the Dodder Bridge -Map E.*
- *Pedestrian/cycle bridge crossing the Liffey between the Samuel Beckett Bridge and the Tom Clarke Bridge - Map E...*

**SMT11 Pedestrian Network** To protect, improve and expand on the pedestrian network, linking key public buildings, shopping streets, public transport points and tourist and recreational attractions whilst ensuring accessibility for all, including people with mobility impairment and/or disabilities, older persons and people.

**SMT12 Pedestrians and Public Realm** To enhance the attractiveness and liveability of the City through the continued reallocation of space to pedestrians and public realm to provide a safe and comfortable street environment for pedestrians of all ages and abilities.

**SMT13 Urban Villages and the 15-Minute City** To support the role of the urban villages in contributing to the 15-minute city through improvement of connectivity in particular for active travel and facilitating the delivery of public transport infrastructure and services, and public realm enhancement.

**SMT14 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.

**SMT16 Walking, Cycling and Active Travel** To prioritise the development of safe and connected walking and cycling facilities and prioritise a shift to active travel for people of all ages and abilities, in line with the city's mode share targets.

**SMT18 The Pedestrian Environment** To continue to maintain and improve the pedestrian environment and strengthen permeability by promoting the development of a network of pedestrian routes including laneway connections which link residential areas with recreational, educational and employment destinations to create a pedestrian environment that is safe, accessible to all in accordance with best accessibility practice.

**SMT19 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.

**SMT22 Key Sustainable Transport Projects** *To support the expeditious delivery of key sustainable transport projects so as to provide an integrated public transport network with efficient interchange between transport modes, serving the existing future needs of the city and region and to support the integration of existing public transport infrastructure with other transport modes. In particular the following projects subject to environmental requirements and appropriate planning consents being obtained:*

- *DART+*
- *Metrolink from Charlemont to Swords*
- *Bus Connects Core Bus Corridor projects*
- *Delivery of Luas to Finglas*
- *Progress and delivery of Luas to Poolbeg and Lucan*

**Section 8.5.8** of the Dublin City Development Plan refers to **Street/Road, Bridge and Tunnel Infrastructure**. It states '*New bridge infrastructure will also facilitate the continued development of the city such as the Dodder Public Transport Bridge, which is linked to development of the Poolbeg West Strategic Development Zone (SDZ) and pedestrian/cycle bridges, which will improve connectivity between the north and south docklands areas.*'

#### **Other Relevant Policies**

There are a significant number of City Development Plan policies with relevance to the delivery of transport in the city, including:

**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 and the south and north Georgian cores with each other, and to other regeneration areas.*

**QHSN11 15-Minute City** *To promote the realisation 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, intergenerational and accessible, safe and inclusive public spaces served by local services, amenities, sports facilities and sustainable modes of public and accessible transport where feasible.*

**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.*

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

Strategic Development and Regeneration Areas (SDRAs) are identified in the Development Plan as areas capable of delivering significant quantum of homes and employment for the city. The proposed Core Bus Corridor passes within one SDRA as identified in the City Development Plan. For each SDRA a series of guiding principles are set out in the plan. The Proposed Scheme is within SDRA 6 Docklands:

##### **SDRA 6 – Docklands**

This SDRA corresponds to the Dublin Docklands area as defined by the Dublin Docklands Authority Act, 1997. It extends to circa 520 hectares. There are two existing development frameworks that relate to the majority of this area, the North Lotts and Grand Canal Dock Planning Scheme and the Poolbeg West Planning Scheme.

Among the guiding principles of relevance to the delivery of the Bus Connects proposal are:



- To enhance public realm to accommodate increased pedestrian movement.
- To support the upgrading of the Campshires to deliver an improved environment for cycling and walking, along with necessary flood relief works.
- Facilitate the delivery of the sustainable transport initiatives identified, including new pedestrian and cycle bridges at specified locations in accordance with SMTO23 including: i) Bridge from North Wall Quay at Point Depot (Point Bridge) and the widening of Tom Clarke Bridge, improve pedestrian and cycling facilities at the crossing point as well as accommodating additional public transport routes in conjunction with the Dodder Bridge. ii) Pedestrian/cycle bridge crossing the Liffey between the Samuel Beckett Bridge and the Tom Clarke Bridge
- To reconfigure Sean Moore Roundabout to a signalised junction and provide for greater accessibility of the Poolbeg West SDZ area with the city centre. This will seek to address issues of severance with the Ringsend area
- To improve sustainable transport connectivity both to and through the area of Dublin Port.
- To support public realm improvements in East Wall to enhance permeability and connectivity to the wider area.

Figure 13-9 SDRA 6 Docklands sets out the 'Guiding principles of the SDRA', those deemed of most relevance to the Proposed Scheme include:

- A potential new bridge is indicated as spanned between York Road and Britain Quay across the River Dodder;
- There are a number of roads included within the Proposed Scheme that are also within the 'Core Pedestrian Spine' including, the north and south quays areas;
- The Proposed Scheme runs through the Docklands SDZ and is immediately to the west of the Poolbeg West SDZ;
- A public realm improvement area is located to the immediate west of the Poolbeg SDZ at the South Bank Road Roundabout; and
- The proposed Eastern Bypass is indicated along the Poolbeg Quay and York Road sections of the Proposed Scheme.

## **2.2.2.2. Area Specific Plans**

### **2.2.2.2.1. George's Quay Local Area Plan**

The Proposed Scheme is within the George's Quay Local Area Plan (2012) from George's Quay (west of Moss Street) along City Quay to Lombard Street East. The lifetime of this plan was extended until July 2022.

### **2.2.2.2.2. North Lotts and Grand Canal Dock SDZ**

The Proposed Scheme is also within the North Lotts and Grand canal Dock SDZ (2014) from the east side of Lime Street to Tom Clarke East Link Bridge. This planning scheme is nearing completion with a significant level of development, primarily commercial and residential either having been completed or under construction. Policies/objectives of this scheme of relevance to BusConnects are as follows:

- Objective CD14 To promote the development of street infrastructure, walking and cycling routes and public transport routes to enhance connections between residential areas and the community facilities that exist in the wider neighbourhood.
- Objective MV1 To continue to promote the modal shift from private car use towards increased use of more sustainable forms of transport such as cycling, walking and public transport and to implement the initiatives contained in the Government's, 'Smarter Travel, A Sustainable Transport Future 2009-2020'.
- Objective MV2 To support and facilitate the development of an integrated public transport network with efficient interchange between transport modes, to serve the existing and future needs of all ages in association with relevant transport providers, agencies, and stakeholders and to facilitate the integration of walking and cycling with public transport.
- Objective MV3 - To provide additional cycle and pedestrian bridges across the canals and rivers in the SDZ to form part of strategic cycling and walking routes.
- Objective MV4 To create and support a well-designed network of pedestrian infrastructure to promote and facilitate walking and cycling; provide priority for pedestrians and cyclists along

key desire lines, developing routes within the Docklands and linking with the surrounding walking and cycling networks in Dublin City.

- Section 4.6.5.1 refers to 'Campshire and Quays'. It states 'All surviving components of architectural and historic interest bordering the water bodies should be conserved and integrated into future programmes of investment so as to contribute to the sustainable regeneration of the area and to provide a continuing link between the past and the future. This would include historic paving materials and street furniture.'
- Objective BH8 To minimise interference in original maritime and river and transport heritage, thereby protecting quays, canal walls, docks, graving docks' industrial fabric and allowing space around these features for amenity purposes.
- Objective BH9 To retain historic paving and street furniture, in addition to maritime features such as mooring rings and the mid-18th century street grid pattern of North Lotts.
- Objective BH10 To retain and promote the industrial heritage of the area by keeping rail, canal, military and maritime fabric, plant and structures in situ and to adapt for reuse
- Objective US8 To ensure that the public realm as a whole, is legible, cohesive, of high quality, and operates as a connected network. It must be seen as a crucial infrastructure, underpinning economic, social and environmental sustainability
- Objective PR8 All bridges to be capable of 'opening' to facilitate sailing ships.

### **2.2.2.2.3. Poolbeg West Strategic Development Zone (SDZ)**

The Proposed Scheme is situated immediately to the west of the Poolbeg West SDZ. The Proposed Scheme is currently active, there are a number of applications which have been approved permission, some of which are just recently under construction. A large portion of the scheme has yet to obtain planning permission. One of the major constraints to further permissions for this site is the requirement of the Dodder Bridge. It is envisaged that this area will accommodate over 3,500 homes as well as 80,000-100,000sqm of commercial floorspace, providing employment for up to 8,000 workers.

Under the 'SDZ Description and Context section it states that 'One item which is of importance for the long term strategic movement to and from this area is a new bridge crossing (Dodder Bridge), which is designated a short distance to the west of the lands at the confluence of the River Dodder, Grand Canal and River Liffey. This bridge will extend the Liffey Corridor spine by connecting Britain Quay with York Road, and thus connect Grand Canal Dock directly with Ringsend and Poolbeg. Although the bridge location is outside the SDZ boundary, it is a critical piece of infrastructure to the success of this new neighbourhood. Objective MTO31 of the Dublin City Development Plan 2016 – 2022 identifies this bridge to be delivered within a six year period.'

Policies/objectives of this scheme of relevance to BusConnects are as follows:

- Objective MV1 To promote a high level of use of sustainable forms of transport including walking, cycling and public transport use having regard to the City Development Plan and national level policies.
- Objective MV2 To provide improved public transport services to the area including a core bus link to the city centre via the proposed Dodder Bridge, enhanced/extended bus services along existing routes, and in the longer term, to provide for delivery of Luas to Poolbeg as part of the planned Red Line extension under the National Transport Authority Strategy 2016–2035.
- Objective MV3 To actively pursue the delivery of the Dodder (or 'Gut') Bridge to facilitate the full build-out of the Planning Scheme in accordance with the Phasing programme as set out in the Land Use & Phasing Chapter. This bridge shall be designed to facilitate public transport and walking/cycling.
- Objective MV4 To protect the route of the proposed Southern Port Access Route and Eastern Bypass in accordance with the objectives of Transport Infrastructure Ireland and the National Transport Authority Strategy for the Greater Dublin Area 2016–2035. As an interim measure it is proposed to provide a separate road access to the south port area via a new link located north of the existing Sean Moore Roundabout.
- Objective MV5 To seek the upgrading of roads and junctions in the immediate vicinity of the SDZ to accommodate improved public transport priority and active modes. These works will include new signalised junctions at the Sean Moore Road/ South Bank Road Roundabout, at the Beach Road/ Sean Moore Road junction. A new pedestrian and cycle link across the



River Liffey will also be prioritised, either by widening/enhancing the existing bridge or by providing a new parallel structure to accommodate walking and cycling.

- Objective MV6 To promote the development of an improved cycle network in accordance with the NTA's Cycle Network Plan, and to seek (inter alia) the following cycle connections in co-operation with the National Transport Authority:
  - Pigeon House Road to Sir John Rogerson's Quay via proposed Dodder Bridge.
  - Bremen Road to Bridge Street (R802) via Ringsend Park.
  - Greenway link from Sean Moore Park to the end of Poolbeg peninsula, integrated with the proposed coastal promenade walking/cycling route, the Sutton to Sandycove cycle route, including loops/spurs through the SDZ. The above shall link to existing and proposed primary routes including the East Coast trail along Beach Road and both the Liffey and Canal Greenway.

It is also noted that ABP approved the Poolbeg West Scheme in 2019 with modifications. The key modification related to BusConnects is as follows:

*'Planned strategic route investment for the area includes the Eastern bypass (alignment preservation) and associated South Port Access route, and the Dodder Bridge. Important for the long-term development of this area is the protection of an alignment for the South Port Access Route protected within the Eastern By-Pass corridor and is similarly protected for the future in accordance with the National Transport Authority Transport Strategy for the Greater Dublin Area. Dublin City Council will also work with Transport Infrastructure Ireland and the National Transport Authority to refine the route of the South Port Access/Eastern Bypass Corridor Reservation. The SPAR scheme would either terminate at Seán Moore Road roundabout or at a new junction further east. Because the South Port Access route will not be delivered for some time, the matter of heavy traffic on South Bank Road needs to be addressed. In this regard, it is intended to provide in the short term a new access as an 'Alternative (South) Port Access Route' to the south port area north of the proposed new junction of Seán Moore Road/South Bank Road.'*

Section 8.12 of the Inspectors Report outlines that *'The Transport Assessment also states that up to 30% build out of the Poolbeg SDZ could be accommodated prior to introduction of the Dodder Bridge, the design of which has already commenced. It was also noted that the granting of permission may be phased to match available transport infrastructure.'*

## **2.3 Planning Assessment:**

### **2.3.1 Planning Policy**

In terms of Regional Policy, as set out in Section 2.2.1, the Proposed Scheme is supported by the RSES. Bus Connects (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 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 the current Dublin City Development Plan and in particular the dual aspirations of delivering necessary transport infrastructure to facilitate compact growth while also protecting Natura designated sites.

The scheme also effects the North Lotts and Grand Canal Dock SDZ area and the Poolbeg West SDZ. Policies within the Poolbeg West SDZ, indeed the delivery of the majority of the proposed housing units on this site, are dependent on the delivery of the Dodder Bridge and so would be in keeping with this proposal.

### **2.3.2 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.

### **2.3.3 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 Assessment of the Natura Impact Statement is a matter for the Board, as the competent authority.

### **2.3.4 Zoning and other designations**

#### **2.3.4.1 Land Use Zoning Objectives**

In the current Dublin City Development Plan (2022-28) the area along the proposed route includes lands with the following zoning objectives: Z1 (residential), Z4 (urban villages and key urban villages), Z5 (city centre), Z9 (open space), Z11 (Waterways Protection), Z14 (Strategic development and regeneration areas).

For the most part, the Proposed Scheme is situated on lands within the existing public road. The area on either side of the Liffey is considered a Conservation Area. The scheme is also within a Zone of Archaeological Interest.

The Dublin City Development Plan 2022-2028 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.

It is noted that the construction compounds R1, R2, R3 and R4 will be located on lands zoned Z5, Z9, Z11 and Z14. These compounds will be for a temporary period only and they will not prevent any long-term zoning objective for the land from being achieved.

The new control building for operating the bridge, new club house and facilities for St. Patrick's Rowing Club, provision of a new ESB substation will be located on reclaimed land directly adjacent to Z9 and Z14 zoned land.

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

#### **2.3.4.2 Built Heritage Objectives**

The corridor for the proposed Ringsend to City Centre Bus Connects scheme traverses the Zone of Archaeological Constraint for several Recorded Monuments which are subject to statutory protection under Section 12 of the National Monuments (Amendment) Act 1994. Further, the site in question is located within the Zone of Archaeological Interest in the current Dublin City Development Plan (2022-28).

The Scherzer Bridges are protected structures (RPS 896 and 912) and a large portion of the Proposed Scheme is located within the River Liffey red hatched conservation area. Both the Archaeology Section and the Conservation Section provide comments/recommendation on the proposal below in relation to these elements.

#### **2.3.4.5 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'. 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. It is considered important that the concerns of the Roads Division Parks, Biodiversity and Landscape Division with regards to the route proposed through Ringsend Park and also the provision or removal of set down spaces is highlighted and should An Bord Pleanála wish to approve the scheme these concerns should be addressed.

### **2.4 Departmental Reports**

The following Dublin City Council Departments and Divisions submitted a report and their response has been incorporated into this submission:

- Forward Planning Section
- Environment and Transportation Department – including comments from Traffic, Roads, Public Lighting and Environmental Protection Divisions
- Archaeology Section
- Conservation Section
- City Architects Division
- City Parks, Biodiversity and Landscape Division

Additional comments/recommendations from the various departments etc. are provided in Appendix 1.

#### **2.4.1 Forward Planning Section Comments**

In order to minimise future disruption of public realm there is a need to coordinate the timing of any future BusConnects works with the Docklands office, particularly in relation to upcoming/ongoing projects including;

- Campshires public realm/flood defence projects (which are at design stage)
- Any planned road works or public realm works in the area.
- Any works planned to public lighting, ducting, or district heating.
- Possible future strategic drainage works including the Grand Canal surface water outfall project (Grand Canal Dock basin to the Sir John Rogersons Quay)

In general, the Proposed Scheme is supported by the high level policies in place in the current Dublin City Development Plan 2022-2028. It is requested that those citywide and area specific policies and objectives mentioned above be taken into account when the proposed works along the Ringsend to City Centre Core route are being formally considered.

## **2.4.2 Environment and Transportation Department**

### **2.4.2.1 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 Dublin City current and draft Development Plans.

Dublin City Council is obligated to consider the Proposed Scheme in the context of the vision and range of policies set out in the current and draft development plans with a view to safeguarding the city as a place in which to live, work, visit and do business.

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

The return of bus passenger number to above pre covid levels and the increase of Bus use at weekends of 27% over the pre covid levels is very welcome.

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

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

### **2.4.2.2 Traffic Division Comments**

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 Bus Connects 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 in the Dublin City Council area is difficult and complex and has called for multiple interventions along the road network in order to achieve its objectives. The use of bus priority signals, turn bans, bus gates and other interventions are all intended to alter the current traffic situation along the route and ensure that Public Transport, walking and cycling can be prioritised over the private car.

It should be noted that this corridor needs to be considered as a whole and that the various different measures to prioritise public transport walking and cycling, need to be implemented in as full a manner as possible to avoid "watering down " the benefits of this scheme by making localised changes to the design.

Because of the nature of the turn bans, bus gates and the use of signal controlled priority 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 for traffic signals are both required for the corridor to meet its objectives

#### **2.4.2.2.1 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.

### **2.4.2.3 Roads Divisions Comments**

This section of the Environment & Transportation report on the Ringsend Bus Connects Scheme has been prepared by the Roads Department. It includes technical input from Roads Design, Roads Construction, Roads Maintenance and Transportation Planning Sections, 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 Department is generally supportive of the scheme and its intention to improve bus and cycling provision. Having reviewed the application documentation, the department 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 Roads Department has 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 for An Bord Pleanála's consideration.

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 Ringsend 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. 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 zones 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.

Another design feature of all schemes is the reallocation of kerbside space to buses and cyclists, the impact of which is the removal of potential kerbside loading and servicing. This activity is 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. Safeguarding the ability of local services to operate is therefore imperative. The extent of loss of loading bays is not clearly quantified in the schemes, nor is the adequacy of alternative provision demonstrated. More information and clarity in this regard would provide comfort that the scheme will continue to support the operation of local businesses. In addition to loading facilities, on street parking is also affected including at commercial units. A condition regarding loading and parking is attached.

Regarding the current scheme, An Board Pleanála should take the following into consideration.

The Ringsend scheme includes the provision of the Dodder Public Transport Bridge which is crucial infrastructure required to connect the Poolbeg peninsula to the city centre and to support development in the area including the approved Poolbeg West SDZ Scheme. The phasing of the Poolbeg West SDZ Scheme is linked to the delivery of this bridge. The Roads Department is therefore very supportive of the delivery of the Dodder Public Transport Bridge as part of the scheme.

It is noted that works are proposed to tighten the junction of North Wall Avenue with North Wall Quay. The construction of North Wall Avenue was a requirement of the North Lotts Grand Canal SDZ Scheme. The design of the street including its junction with North Wall Quay accommodated the swept path of very large HGVs accessing the 3 Arena venue. Should the junction be tightened as proposed, such vehicles will be forced to mount the footpath which would be undesirable and give rise to safety concerns for pedestrians.

An Bord Pleanála is advised of proposals to signalise the Point Roundabout and in doing so provide an improved connection to the east side of East Wall Road and the Port Company's approved 1.4km pedestrian/cyclist amenity route. The layout of the Ringsend scheme, where it interacts with the Point Roundabout, may require alteration as part of the signalisation and upgrade of this area.

Some location specific comments are provided below:

Sheet no. 1:

- The existing south bound cycle lane on the west side of the R802 Memorial Road approaching the Talbot Memorial Bridge, a cycle lane should be retained in this location facilitating the direct southwest bound connection on west side of the road and bridge.
- The Talbot Memorial Bridge/City Quay junction could benefit from a 4<sup>th</sup> arm on the pedestrian crossing facilitating pedestrians on the footpath along the quay-side on the east-west journey. The current junction design requires a three stage crossing movement by pedestrians along the quay.
- The pedestrian crossing on the east-side of the Lombard Street East junction should be relocated further west to facilitate desire lines.

Sheet no. 2:

- A pedestrian crossing arm should be provided alongside cycle lane crossing at the west-side of Samuel Beckett Bridge / Sir John Rogerson's Quay junction, this is to improve north-south connectivity.
- Introduce measures to improve the interaction between pedestrians and cyclists at the south east corner of the Samuel Beckett Bridge and Sir John Rogerson Quay.
- The requirement for insertion of coach stops on North Wall Quay which involves encroachment onto the campshires is not clear.

Sheet no. 7:

- The York Road / Cambridge Road / Pigeon House Road should be upgraded.

Sheet no. 10:

- Controlled pedestrian crossing should be considered for Cambridge Road/Park junction



#### **2.4.2.4 Environmental Protection Division Comments**

Dublin City Development Plan 2022-2028, 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.

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:

- o 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.
- o Enclosed drainage channels such as slot drains or “ACO” drains are not accepted by Drainage Planning, Policy and Development.
- o 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 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.

Flow control manholes to be clearly identified throughout the design as it would allow a better understanding of the design and how the attenuation is proposed to work.



Outfall details in the Overall Catchment drawings were omitted from the submission.

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

1. Ch A550-700, A190-310, A50-160, Tree pits and SuDS devices should be employed where possible, tree pits could improve the runoff prior to discharge to the Liffey.
2. Ch B11320-11360, SuDS devices should be employed where practicable, a system of tree pits could be used here rather than hard engineering solutions.
3. Ch D30000, SuDS devices should be employed where practicable, a bio retention system could be used here rather than oversized pipes etc.
4. Infiltration tests to be carried out as per BRE 365 for all infiltration trenches.
5. BCIDD-ROT-DNG\_RD-0016\_XX\_00-DR-CD-1001 does not show the discharge points for each catchment. More information would allow for a clearer understanding of the scheme.

**Water Framework Directive**

The proposed Ringsend to City Centre Core Bus Corridor Scheme transverses the catchment of the Lowe Liffey Estuary within the Dublin City Council administrative area. Albeit all waterbodies are subject to the European Union Water Framework Directive, this waterbody is included in the River Basin Management Plan (RBMP) as a 'second tier river' 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 Lower Liffey Estuary is of 'moderate' status.

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

It should be noted that while the Ringsend Wastewater Treatment Plant is listed as the receptor for Surface Water runoff draining into the combined sewer this, this runoff can still affect adjacent waterbodies via Combined Sewer Overflows during rainfall events.

The developer shall provide an evidence-based assessment of the impact, if any, of the Proposed Scheme on the water quality status of the 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 Dodder River.
- Plan for dealing with local pluvial flooded areas anywhere where flood depths on the carriageway are predicted to be above 300mm.
- Climate Change Flood Adaption Plan for river crossing.
- FRA should give more detail on the river crossing.

Dublin City Council are planning a number of new flood defence projects along the route of this scheme. We would recommend that NTA liaise with the City Council on these schemes as it may be possible to achieve significant mutual benefits.

### **2.4.3 Archaeology Section Comments**

The corridor for the Proposed Scheme runs from Talbot Memorial Bridge to Ringsend along both the North and South Quays. The Quays, Ringsend, and Irishtown are all included within Zones of Archaeological Potential for Recorded Monuments protected under Section 12 of the National Monuments Act as amended. The scheme will also impact sites listed on the Dublin City Industrial Heritage Record. Archaeological mitigation in these areas will be required where subsurface excavation is proposed. Due to the construction of a new bridge and boardwalks there may also be impacts on underwater archaeology.

Of particular concern is that the scheme as proposed will have a significant negative impact on the two pairs of Scherzer Rolling Lift Bridges on the North Quays located at Georges dock and Spencer Dock resulting in the loss of original fabric, form, and setting which is discussed further below. These bridges are Protected Structures (896, 912) and are listed on the National Inventory of Architectural Heritage (NIAH) (50010001, 50010009) and on the Dublin City Industrial Heritage Record (DCIHR) (18-11-115, 18-12-063).

#### **2.4.3.1 Statutory Protection and Development Plan Policies**

The Proposed Scheme is within the Zone of Archaeological Potential for several Recorded Monuments which are listed on the Record of Monuments and Places (RMP) and are subject to statutory protection under Section 12 of the National Monuments (Amendment) Act 1994. The Record of Monuments and Places (RMP) consists of a published county-by-county set of Ordnance Survey maps, on which monuments and places are marked by a circle or polygon, and an accompanying book for each county listing the monuments and places.

It is the Policy of Dublin City Council:

#### **BHA26 Archaeological Heritage**

1. To protect and preserve Monuments and Places listed on the statutory Record of Monuments and Places (RMP) as established under Section 12 of the National Monuments (Amendment) Act 1994 which have been identified in the Record of Monuments and Places and the Historic Environment Viewer ([www.archaeology.ie](http://www.archaeology.ie)) and all wrecks over 100 years old including those in the Shipwreck Inventory of Ireland.
2. To protect archaeological material in situ by ensuring that only minimal impact on archaeological layers is allowed, by way of re-use of standing buildings, the construction of light buildings, low impact foundation design, or the omission of basements (except in exceptional circumstances) in the Monuments and Places listed on the statutory Record of Monuments and Places (RMP) as established under Section 12 of the National Monuments (Amendment) Act 1994.

3. To seek the preservation in situ (or where this is not possible or appropriate, as a minimum, preservation by record) of all archaeological monuments included in the Record of Monuments and Places; all wrecks and associated objects over 100 years old and of previously unknown sites, features and objects of archaeological interest that become revealed through development activity. In respect of decision making on development proposals affecting sites listed in the Record of Monuments and Places, the council will have regard to the advice and/or recommendations of the Department of Housing, Heritage and Local Government.
4. Development proposals within the Record of Monuments and Places (RMP) as established under Section 12 of the National Monuments (Amendment) Act 1994, notification of sites over 0.5 hectares size with potential underwater impacts and of sites listed in the Dublin City Industrial Heritage Record, will be subject to consultation with the City Archaeologist and archaeological assessment prior to a planning application being lodged.
5. To preserve known burial grounds and disused historic graveyards. Where disturbance of ancient or historic human remains is unavoidable, they will be excavated according to best archaeological practice and reburied or permanently curated.
6. Preserve the character, setting, and amenity of upstanding and below ground town wall defences.
7. Development proposals in marine, lacustrine and riverine environments and areas of reclaimed land, shall have regard to the Shipwreck Inventory maintained by the Department of Housing, Local Government and Heritage and be subject to an appropriate level of archaeological assessment.
8. To have regard to national policy documents and guidelines relating to archaeology and to best practice guidance published by the Heritage Council, the Institute of Archaeologists of Ireland and Transport Infrastructure Ireland.

With regards to Industrial Heritage, the River Liffey, and the Docklands it is the policy of Dublin City Council:

**BHA12 Industrial, Military and Maritime, Canal-side and Rural Heritage**

- To promote an awareness of Dublin's industrial, military and maritime, canal side (including lock-keepers' dwellings, locks and graving docks), rail, and rural (vernacular) heritage.

**BHA13 Maritime Heritage and Maritime Villages**

- To support maritime heritage in built form, to foster initiatives that give expression to the maritime heritage of Dublin City (including trails, features and public realm design), and to promote and develop the character and heritage of coastal and maritime villages.

**BHA16 Industrial Heritage**

- To have regard to the city's industrial heritage and Dublin City Industrial Heritage Record (DCIHR) in the preparation of Local Area Plans and the assessment of planning applications. To review the DCHIR in accordance with Ministerial Recommendations arising from the National Inventory of Architectural Heritage (NIAH) survey of Dublin City.

**BHA17 Industrial Heritage of Waterways, Canals and Rivers**

- To support and promote a strategy for the protection and restoration of the industrial heritage of the city's waterways, canals and rivers, including retaining features such as walls, weirs, millraces, and the graving dock structures at Ringsend.

**BHA32 Water-Related Heritage Strategies**

- To support the creation and implementation of water-related heritage strategies in partnership with restoration and enhancement of river and canal corridors within the city.

**2.4.3.2 EIAR**

The archaeological and cultural heritage impacts of the construction phase and operational phase associated with the construction and operation of the Ringsend to City Centre Core Bus Corridor Scheme are assessed in Chapter 15 of the Environmental Impact Assessment Report (EIAR). This report provides a desk study of published and unpublished documentary and cartographic sources, supported by a field survey. The findings of the report are summarised below.

The EIAR lists several sites/areas of historical and cultural heritage importance along the route. The North and South Quays in this area are included within the Recorded Monument of the Historic City of Dublin (DU018-020). The North Wall (DU018-020564-), City Quay (DU018-020479), and Sir John Rogerson's Quay (DU018-020201-) are also listed as individual monuments. Along the Quays there are a number of industrial heritage features including the Scherzer Bridges and the locks for Georges Dock and Spencer Dock. Further to the west the scheme passes through the Recorded Monuments of both Ringsend (DU018-053) and Irishtown (DU018-054) and the sea wall along York Road/Pigeon House Road (DU018-066). Construction of two boardwalk sections along the North Quays and a new bridge at the mouth of the Dodder will potentially impact on underwater archaeology.

Section 15.4.3 of the EIAR provides the main potential impacts on archaeology and cultural heritage as a result of construction works could arise from:

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

The EIAR proposes that all subsurface archaeological and cultural heritage issues be resolved by archaeological 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.

Section 15.5 of the EIAR addresses the proposed archaeological mitigation measures as follows:

- An experienced and competent licence-eligible archaeologist will be employed by the appointed contractor to advise on archaeological and cultural heritage matters during construction, to communicate all findings in a timely manner to the NTA and statutory authorities, to acquire any licenses/ consents required to conduct the work, and to supervise and direct the archaeological measures associated with the Proposed Scheme.
- Licence applications are made by the licence-eligible archaeologist to the National Monuments Service at the DHLGH. In addition to a detailed method statement, the applications must include a letter from the NTA that confirms the availability of adequate funding. There is a prescribed format for the letter that must be followed.
- Other consents may include a Detection Device licence to use a metal-detector or to carry out a non-invasive geophysical survey.
- A construction schedule will be made available to the archaeologist, with information on where and when the various elements and ground disturbance will take place.
- As part of the licensing requirements, it is essential for the client to provide sufficient notice to the archaeologist(s) in advance of the construction works commencing. This will allow for prompt arrival on site to undertake additional surveys and to monitor ground disturbances. As often happens, there may down time where no excavation work is taking place during the construction phase. In this case, it will be necessary to inform the archaeologist/s as to when ground-breaking works will recommence.
- In the event of archaeological features or material being uncovered during the Construction Phase, all machine work will cease in the immediate area to allow the archaeologist/s time to inspect and record any such material.
- Once the presence of archaeologically significant material is established, full archaeological recording of such material is recommended. If it is not possible for the construction works to avoid the material, full excavation will be recommended. The extent and duration of excavation will be advised by the client's archaeologist and will be a matter for discussion between the NTA and the licensing authorities.
- Secure storage for artefacts recovered during the course of the monitoring and related work will be provided by the appointed contractor.
- As part of the licensing requirement and in accordance with the funding letter, adequate funds to cover excavation, post-excavation analysis, and any testing or conservation work required will be made available.

- During the construction all machine traffic must be restricted as to avoid any newly revealed archaeological or cultural heritage sites and their environs. Materials management will be in operation to ensure no damage to a site of archaeological interest

Archaeological monitoring (as defined in section 15.5.1) under licence will take place, where any preparatory ground-breaking or ground reduction works are required (as defined in section 15.4.1), at all sites of archaeological and cultural heritage along the proposed route, including National Monuments, Recorded Monuments and sites listed in the DCIHR.

It is in these areas that there is a possibility to disturb intact archaeological layers and material. Licensed archaeological excavation, in full or in part, of any identified archaeological remains (preservation by record) or preservation in situ will be undertaken.

Appendices A15.5 and A15.6 of the EIAR consist of Underwater Archaeological Impact Assessments. These propose archaeological monitoring of any works which involve disturbance of the riverbed. They also assess the impact of the works on the historic quay walls and propose that any removals or alteration of the masonry structures be carried out under archaeological supervision#

### 2.4.3.3 The Scherzer Bridges

Two pairs of lifting bridges are present on the North Quays within the area of the scheme. Located at North Wall Quay at the entrance to Spencer Dock/The Royal Canal (Constructed 1911-12) and at Custom House Quay at the entrance to Georges Dock (Constructed 1933), these bridges are of a type known as 'Scherzer Rolling Lift Bridges'. Currently the set at Spencer Dock are in working order, having been repaired in 2003, while the Georges Dock pair are non-functional. These bridges are Protected Structures (896, 912) and are listed on the National Inventory of Architectural Heritage (NIAH) (50010001, 50010009) and on the Dublin City Industrial Heritage Record (DCIHR) (18-11-115, 18-12-063). Both bridges are also located within a Conservation Area. Appendix A3.1 of the EIAR consists of an Industrial Heritage and Options Appraisal Report on the Bridges written by Fred Hamond (Industrial Archaeologist), John Kelly (Brady Shipman Martin) and Fergal McNamara (7L Architects).



Figure 1. Scherzer Bridges at Georges Dock

Invented by the American engineer William Donal Scherzer in 1893, the Scherzer Rolling Lift Bridge is a type of bascule, or lifting bridge. Scherzer died of typhoid fever later the same year but the design was successful and was refined and marketed by his brother Albert. Scherzer's innovation was to introduce a 'rolling' or 'rocking chair' mechanism around which the bridge moves. This allowed the



bridges to open and close quickly and efficiently. Those installed at the Royal Canal could open fully in 40 seconds, and while a boat passing could cause up to 22 minutes of traffic disruption with the older swing bridge at this location this was reduced to only 4½ with the Scherzer bridges. Of particular note is that both sets of bridges are comprised of pairs. This is not due to a design limitation, as Scherzer bridges could be built both longer and wider, rather it is an engineering solution. Due to the speed at which the bridges could operate, one could remain lowered as a boat began to pass under the other, only opening at the last moment, thus reducing the time the crossing was completely closed to traffic. This deliberate paired design therefore forms part of the special character of the Protected Structures.



*Figure 2. Scherzer Bridges at Spencer Dock*

### **Commentary**

It is proposed to divide both pairs of bridges in order to facilitate road widening. This will result in the loss of original fabric as the substructure of the bridges cannot be moved. Historic stonework from the locks will also be removed. The Protected Structures will lose their original form, being effectively cut in half visually. Although they will be reinstalled close to their original location, there will be a loss of visual setting as they will no longer sit in the carriageway as designed and will lose their visual prominence.

Besides the two Dublin pairs, only four other bridges of this type were built in Ireland. Of these three survive, and only one, Mount Garrett Bridge (NIAH 15702907) over the River Barrow in Wexford, still retains its lifting elements although it is inoperable. This makes the Royal Canal pair unique in Ireland in that they are operational. The Industrial Heritage Report further states that there is only one remaining functional Scherzer bridge in the United Kingdom, White Cart Bridge at Renfrew, Scotland. This is slightly incorrect, since a second example, Corporation Bridge in Grimsby, is usually maintained in working order but was found inoperable during testing in 2017 and is currently undergoing repairs due to be finished by the end of 2023.

Neither White Cart nor Corporation Bridge are of the paired design seen in Dublin. Information on Scherzer Bridges internationally is not provided in the report. Nevertheless, this makes the Dublin pairs and the Royal Canal bridges in particular being operational a rare survival in the UK and Ireland. Although other examples of paired Scherzer bridges are known to have been constructed in the United States. Until further research is conducted it should be considered that the Dublin examples may be unique survivals of this paired type in this part of the world. The negative impact of the proposal to divide them is of significance.

The EIAR assesses the impact of the Proposed Scheme on both pairs of bridges in the construction phase as having a *'Negative, Significant, and Permanent impact.'* The proposed mitigation of relocation is stated as reducing this to *'No significant impact.'* The impact statement in the EIAR is not supported by this office.

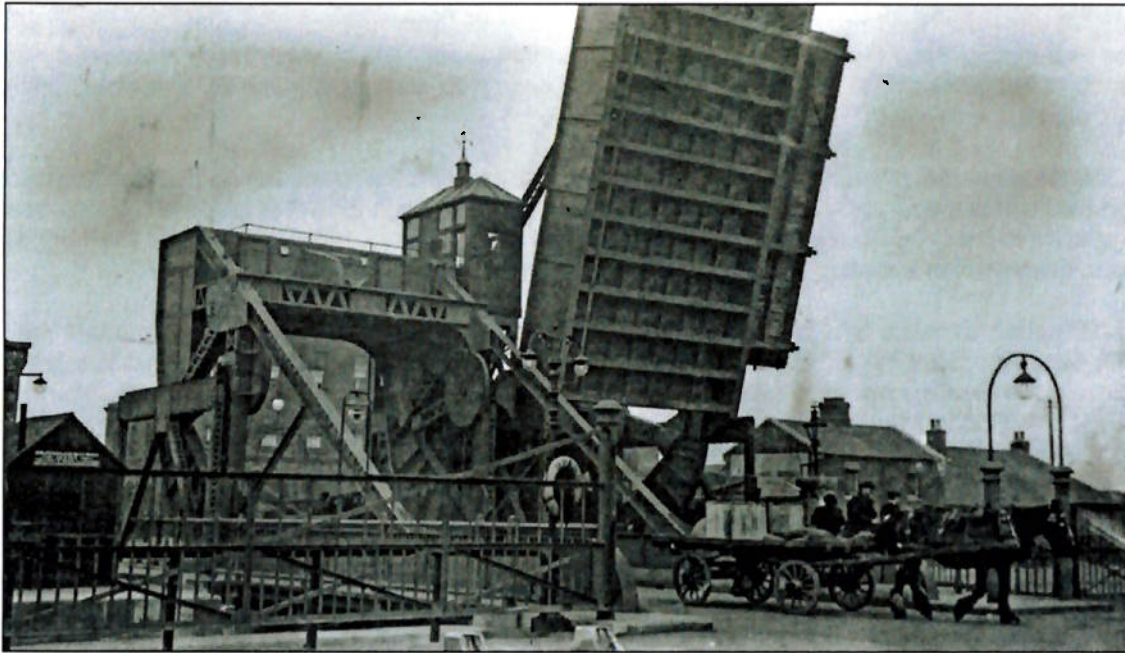
The options appraisal evaluates a 'do nothing scenario' and considers several different proposals. All proposals involve moving and separating the bridges to create space for a four lane road. No proposals for the bridges have been considered at this time that include traffic redesign to leave the bridges in situ, for instance implementing a bus gate system.

The justification for a four lane road at this location is not fully clear in the EIAR. The Industrial Heritage and Options Appraisal Report states that *'it is assumed that the case for two dedicated bus lanes in addition to the existing two-lane carriageway has been made elsewhere to meet the requirements of BusConnects Dublin along CBC route 16.'* The heritage opinion appears to have been made after route design decisions have been made rather than informing the design phase.



Figure 3. Spencer Dock bridges in 1913. Note the appearance of the pair of bridges as a single structure, reinforced by the central control cabin (Now removed).





*Figure 4. Spencer Dock pair in operation, with one bridge lifted.*



*Figure 5. Current appearance of Spencer Dock bridges.*





Figure 6. Proposed Scheme.

The Options Appraisal uses five categories for its evaluations: physical integrity of the bridges, physical integrity of associated features, landscape setting, functionality, and public amenity. All options except the do nothing scenario evaluated for both pairs of bridges score negatively in terms of physical integrity of the bridges and associated features. We are concerned that the EIAR has offset the heritage impacts with functionality, here defined as a reduction in vehicular traffic over the bridges and public amenity, defined as *'pleasant user experience'* for pedestrians and cyclists and an *'opportunity for public engagement'* over the integrity and special character of a Protected Structure in its setting.

The traffic appraisal assessed the bearing capacity of the bridges and states that *'Although designed for 1930s traffic, they are still capable of carrying today's traffic.'* Functionality is therefore not a major issue. Regarding public amenity this office does not consider that the current situation presents a *'Poor user experience and little opportunity for public engagement'* as stated in the report as these bridges are currently accessible to the public and can be viewed in their original setting and form.

Article 12 of the Convention for the Protection of the Architectural Heritage of Europe forms the basis of European architectural protection law to which Ireland is a signatory. This article states that *'While recognising the value of permitting public access to protected properties, each Party undertakes to take such action as may be necessary to ensure that the consequences of permitting this access, especially any structural development, do not adversely affect the architectural and historical character of such properties and their surroundings.'* This suggests that public amenity should not be a category used to justify structural alterations to a Protected Structure.

The landscape setting for the preferred option is rated in the EIAR as neutral for the Spencer Dock pair of bridges and positive for the Georges Dock pair of bridges given a rotation of the bridges to prevent a visual impact on Stack B. Named for an earlier historic warehouse and incorporating a small amount of historic fabric, Stack B is not a protected structure or one of high industrial heritage significance. The focus of the EIAR the visual impact of repositioning of the bridges on Stack B whereas we would argue that the appropriate focus is the impact of Stack B on the relocated bridges.

To conclude, the Proposed Scheme will have a permanent impact on the Scherzer Bridges resulting in the loss of original fabric, of the original paired form and special character of the original setting. It is recommended by this office that further and more detailed research be done by the NTA into revised design options to allow the bridges to remain in situ. After which should permanent impact on the bridges be found necessary for the Proposed Scheme it should be demonstrated that the decision is based upon the economic and social positives of the scheme and clearly stated in the report that there will be a negative architectural heritage impact on the structures which cannot be fully mitigated.

#### 2.4.3.4 Additional note on 'Free Flow' public artwork

Within the EIAR Cultural Heritage assets have been bundled with archaeology, so that while strictly speaking these assets are outside of the remit of the Archaeology Section, some observations were made that are of wider concern and these points are highlighted here. The EIAR does not assess the impact of the scheme on the artwork *Free Flow* (2005) by Rachel Joynt and the authors may in fact be unaware of it. Commissioned by the Dockland Development Authority, this piece consists of 900 glass cobbles containing silver and copper sea creatures set into light fixtures which run from Customs House Quay to the Point Depot. Rachel Joynt is one of Ireland's most notable public artists, and is responsible for several other pieces in the city including *People's Island* (1988), a series of crisscrossing bronze footprints on the pavement at the south site of O'Connell Bridge, and *Woodkey Walk* (1992), a trail of 18 panels around the perimeter of the Civic Offices showing artefacts discovered during the archaeological excavations on the site. A more recent high profile commission was *Dearcán na nDaoine – The People's Acorn* (2017), installed on the grounds of Áras an Uachtaráin as part of the 1916 centenary commemorations. Due to the understated nature of this linear artwork it is vulnerable to any construction being carried out in the area and an assessment of the potential impact of the scheme should be carried out as a priority, including mapping the location of the individual lights on the scheme documentation. During the construction of the Luas Cross City project in 2017 there was an impact on *People's Island* and the opportunity was taken to work with the artist to restore and reconfigure the artwork to ensure the piece continues to be enjoyed in the future. A similar proposal might be considered here. Archaeological monitoring and recording method and techniques would be useful in mitigating for any impact on it and we recommend that this art piece is noted in the contract documents.

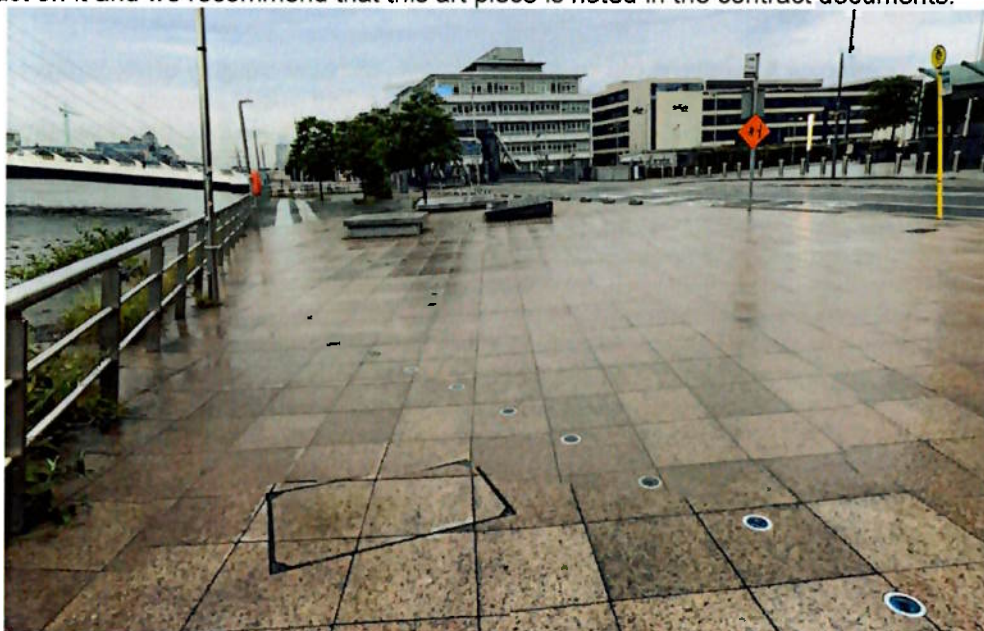


Figure 7. View of North Wall Quay showing section of 'Free Flow' in situ.





Figure 8. Close up of individual light.

#### 2.4.3.5 Recommendations

##### **Industrial Heritage**

Update the EIAR to contain revised proposals for the Scherzer Bridges and fully evaluate options for retention in situ.

##### **Public Artwork**

Update the Cultural Heritage Impact Assessment to include an impact assessment and mitigation strategy for the 'Free Flow' sculpture.

##### **Archaeology**

NTA to appoint a Project Archaeologist as a member of the NTA project team to oversee all archaeological aspects of the project from inception to completion. 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.

The Project Archaeologist shall ensure that the process of identifying the potential impact the project on archaeology is dealt with by a competent archaeologist.

The Project Archaeologist shall oversee the archaeological operations carried out by the contractor's archaeological consultant.

The Project Archaeologist shall 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.

The Project Archaeologist shall 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.

The NTA shall 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.

The Project Archaeologist shall ensure the publication and/or dissemination, as appropriate, the archaeological results of the project.

The Project Archaeologist shall copy Dublin City Council Archaeology Section with all Section 26 method statements and any reports arising and provide regular updates on finds and mitigation throughout the delivery of the scheme through to completion.

The Project Archaeologist shall ensure that the primary archaeological paper archive for all archaeological site investigations be prepared and deposited with the Dublin City Archaeological Archives within a timeframe to be agreed with the planning authority unless otherwise agreed with the Minister.

#### **2.4.4 Conservation Section Comments**

##### **Introduction**

The following high-level architectural heritage assessment has been carried out by the Conservation Section in the context of the Dublin City Development Plan 2022 – 2028, 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 2022 – 2028**

Chapter 11 – Built Heritage and Archaeology, 11.1 Introduction, *'It is recognised that the city's built 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 vital social, cultural, and economic asset for the development of the city.'*

*The city's historic buildings, streetscape villages, Georgian terraces and squares, Victorian and Edwardian architecture, industrial heritage, institutional landmarks, modernist buildings of the 20<sup>th</sup> 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.'*

**Section 11.5.1** Curtilage of a Protected Structure 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:*

**BHA2:** *Regarding Development of Protected Structures:*

*'That development will conserve and enhance Protected Structures and their curtilage and will:*

- a) Ensure that any development proposals to protected structures, their curtilage and setting shall have regard to the Architectural Heritage Protection Guidelines for Planning Authorities (2011) published by the Department of Culture, Heritage and the Gaeltacht.*
- b) Protect structures included on the RPS from any works that would negatively impact their special character and appearance.*
- e) Ensure that the form and structural integrity of the protected structure is retained in any development and ensure that new development 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.*
- i) Ensure historic landscapes, gardens and trees (in good condition) associated with the protected structures are protected from inappropriate development.'*

**Section 11.5.2** *Architectural Conservation Areas and Conservation Areas states: 'The Planning and Development Act, 2000 (as amended), provides the legislative basis for the protection of Architectural Conservation Areas (ACAs). Under the Act, an ACA is defined as a place, area, group of structures or townscape that is of special architectural, historical, archaeological, artistic, cultural, scientific, technical, social interest or value or contributes to the appreciation of protected structures.*

*ACAs are designated in recognition of their special interest or unique historic and architectural character and important contribution to the heritage of the city. This character is often derived from the cumulative impact of the area's buildings, their setting, landscape and other locally important features which developed gradually over time...*

*The protected status afforded by inclusion in an ACA only applies to the exterior of structures and features of the streetscape.'*

*It is the Policy of Dublin City Council:*

**BHA7:** *Regarding Architectural Conservation Areas:*

- a) To protect the special interest and character of all areas which have been designated Architectural Conservation Areas (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 other features, which contribute positively to the special interest of 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.*

*'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.'*

*It is the Policy of Dublin City Council:*

**BHA8:** *Regarding Demolition in an ACA:*

*'There is a presumption against the demolition or substantial loss of a structure that positively contributes to the character of the ACA except in exceptional circumstances where such loss would also contribute to a significant public benefit.'*

**Section 11.5.3 Z2 and Z8 Zonings and Red-Hatched Conservation Areas**

*'The Z8 Georgian Conservation Areas, Z2 Residential Conservation Areas and red-lined Conservation Areas are extensive throughout the city. Whilst these areas do not have a statutory basis in the same manner as protected structures or ACAs, they are recognised as areas that have conservation merit and importance and warrant protection through zoning and policy application.*

*...The special interest/value of Conservation Areas lies in the historic and architectural interest and the design and scale of these areas. Therefore, all of these areas require special care in terms of*

development proposals. The City Council will encourage development which enhances the setting and character of Conservation Areas.

As with Architectural Conservation Areas, there is a general presumption against the development which would involve the loss of a building of conservation or historic merit within the Conservation Areas or that contributes to the overall setting, character and streetscape of the Conservation Area. Such proposals will require detailed justification from a viability, heritage and sustainability perspective.'

It is the Policy of Dublin City Council:

**BHA9:** Regarding Conservation Areas, enhancement opportunities may include:

'3. Improvement of open spaces and wider public realm and reinstatement of historic routes and characteristic plot patterns.'

It is the Policy of Dublin City Council:

- **BHA10:** Regarding Demolition in a Conservation Area:
- 'There is a presumption against the demolition or substantial loss of a structure that positively contributes to the character of the Conservation Area, except in exceptional circumstances where such loss would also contribute to a significant public benefit.'

It is the Policy of Dublin City Council:

**BHA15:** Regarding Twentieth Century Buildings and Structures:

a) 'To encourage the appropriate development of exemplar twentieth century buildings and structures to ensure their character is not compromised.'

It is the Policy of Dublin City Council:

**BHA16:** Regarding Industrial Heritage:

a) 'To have regard to the city's industrial heritage and Dublin City Industrial Heritage Record (DCHIR) in the preparation of Local Area Plans and the assessment of planning applications...'

### **Section 11.5.3 Protection of Historic Ground Surfaces, Street Furniture and Public Realm**

'Dublin is fortunate to still retain impressive areas of historic street surfaces such as granite kerbing, granite pavement flags and granite and/or diorite setts, mainly but not entirely situated in the city centre. These along with other important historic features in the public realm such as milestones, city ward stones, street furniture, water troughs, post boxes, lampposts and railings make a special contribution to our built heritage. These items are often an integral part of the urban landscape or province significant historic references which greatly contribute to the character of an area, especially where they complement the architectural features of protected structures, Architectural Conservation Areas and Z2, Z8 and Red-Hatched Conservation Areas.'

It is the Policy of Dublin City Council:

**BHA18:** Regarding Historic Ground Surfaces:

a) 'To protect, conserve and retain in situ historic elements of significance in the public realm including milestones, jostle stones, city ward stones, bollards, coal hole covers, gratings, boot scrapers, cast iron basement lights, street skylights and prisms, water troughs, street furniture, post boxes, lampposts, railings and historic ground surfaces including kerbs, pavement flags and setts and to promote conservation best practice and high standards for design, materials and workmanship in public realm improvements within areas of historic character, having regard to the national Advice Series on 'Paving: The Conservation of Historic Ground Surfaces (2015).'

It is the Policy of Dublin City Council:

**BHA24:** Regarding Reuse and Refurbishment of Historic Buildings:

'Dublin City Council will positively encourage and facilitate the careful refurbishment of the historic built environment for sustainable and economically viable uses and support the implementation of the National Policy on Architecture as it relates to historic buildings, streetscapes, towns and villages, by ensuring the delivery of high quality architecture and quality place-making and by demonstrating best practice in the care and maintenance of historic properties in public ownership.'

It is the Policy of Dublin City Council:

**BHA26:** Regarding Archaeological Heritage:

(5) *'To preserve known burial grounds and disused historic graveyards. Where disturbance of ancient or historic human remains is unavoidable, they will be excavated according to best archaeological practice and reburied or permanently curated.'*

(6) *'Preserve the character, setting and amenity of upstanding and below ground town wall defences.'*

### **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 subject to assessment:

- Protected Structures and Proposed Protected Structures and their settings
- Buildings and other structures (post boxes/milestones etc.) and historic landscapes included on 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 Conservation Section finds that a thorough study of the receiving environment has been carried out. The EIAR package includes a suite of architectural heritage reports that document the subject area in detail. Appendix A16.1 Historical Background provides a well-researched discussion on the history of the development of the route. Appendix A16.2 Inventory of Architectural Heritage Sites provides a written and photographic record, importance rating and sensitivity rating for all protected structures, NIAH-recorded structures, designed landscapes, unprotected structures of built heritage significance, street furniture, paving and surface treatments along the route. The record is comprehensive and accurately describes the quality and status of the heritage structures. Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric outlines the conservation philosophy which is to be adhered to during the design and implementation of the scheme and provides a description of the proposed interventions that will affect protected structures and other features of architectural heritage interest. In Section 1.1.1, the writer of the report notes that *"All features and materials of importance to maintain the character of the historic built environment should be retained including features of all ages (DCC 214, DELG 2000),"* and that *"Architectural heritage features such as buildings, boundary treatments, working quays, stone setts, cobbles, paving and other heritage artefacts such as street furniture have been retained in situ where possible in the design of the Proposed Scheme."*

A description of the proposed bus connects scheme is provided in the Non-Technical Summary document (p18) which states: *"The Proposed Scheme has an overall length of approximately 4.3km (2 x 1.6km along the River Liffey Quays and 1.1km of cycle route through Ringsend and Irishtown to Sean Moore Road), and is routed along the north and south quays of the River Liffey, linking the city centre with the Docklands and an onward cycling connection to Ringsend and Irishtown, all within the County of Dublin and within the Dublin City Council (DCC) administrative area. The Proposed Scheme includes priority for buses along the entire length of the north quays from Talbot Memorial Bridge to the 3Arena at the Tom Clarke East Link Bridge, consisting of dedicated bus lanes in both directions, which will require the relocation of both pairs of Scherzer Bridges along the north quays. Bus priority will also be achieved on the south quays through the provision a new opening bridge across the River Dodder (via the Dodder Public Transport Opening Bridge (DPTOB)) as well as the provision of intermittent sections of bus lane to ensure bus priority on the approach to all major junctions. Full bus lane provision on the south quays is not considered necessary in the context of the layout of the traffic cells and existing one-way restrictions, which prevent congestion developing. Eastbound buses will use the north quays only between the Customs House and the Samuel Becket Bridge, with eastbound buses proceeding on both quays from this point to the Tom Clarke East Link Bridge. Westbound buses will use the full length of both quays."*

The route lies within Dublin's docklands, which, as the country's principal historical gateway, is an area of significant archaeological, historical, social and industrial heritage interest. Whilst the EIAR sets out provisions for mitigation to ease the impact of the works, it is clear that the proposed development will require permanent significant changes that will result in a series of irreversible adverse impacts to a number of important heritage structures and their settings. As such, the Conservation Section of Dublin



City Council is highly concerned about the negative impact that the development will have on the heart of Dublin's docklands.

When evaluating the Proposed Scheme, it is important to take a retrospective view at the modern history of the docklands in the context of changes that have been made since its rejuvenation first began. Redevelopment of the docklands commenced in the mid-1980s with the establishment of the IFSC, and over the course of the intervening decades, the landscape of the north and south quays has been transformed by the building of commercial properties and residential blocks. As part of this regeneration, the sensitive industrial landscape has been incrementally altered to accommodate modernisation.

Since the 1980s, a number of early industrial warehouse buildings along the quays and various older structures have been demolished to make way for development. Other structures, once essential to the traditional functioning of the docks, were either relocated or adapted for new use. The cumulative impact of these interventions has resulted in eroding the sensitive character of the industrial heritage landscape (which is a Conservation Area), and lessening the significance of these structures within their historic context.

Examples of the previous regeneration that has modified the early the industrial heritage of the area include the relocating of a stone arch, dating from 1813, from Amiens Street to the Custom House Quay in 1998; the conversion of the large tobacco warehouse of c.1820, attributed to John Rennie, to the glass-fronted CHQ building; and the redevelopment of the former train shed that was once the Point Depot to the present-day 3 Arena. Successive alterations to and/or the moving of Protected Structures and non-Protected Structures of interest within the early industrial landscape, has diluted the heritage significance and value of the docklands.

It must be emphasised that the process of moving of an industrial heritage structure from its original context obliterates the legibility of its intended function and reduces it in significance to no more than visually pleasing furniture. Best conservation practice advocates for the retention of historic structures within their original context as is indicated within The Architectural Heritage Protection Guidelines (Sections 3.4.2 and 13.9) which states that "*The contribution of setting to the character of the architectural heritage should not be underestimated,*" and "*There is a close relationship between a protected structure and its location which may have been established at the time of construction or which has grown up and adapted as the life of the building progressed. Moving a historic building separates it irrevocably from its setting. Dismantling a structure, no matter how carefully executed and well meaning, can result in damage to the fabric.*"

The Conservation Section asserts that The Bus Connects Ringsend to City scheme has not adequately considered the importance of the relationship between historic structures and their setting.

The Conservation Section has concerns regarding the further proposed changes now required under this scheme, the most serious of which include the proposed dismantling and relocation of two pairs of the historic Scherzer Bridges (Protected Structures RPS 896 and RPS 912) in two locations on the north quays and alterations to the historic quay walls along the river. The Section submits that proposed interventions to the bridges and their immediate setting would result in significant loss of and damage to the historic industrial heritage and should therefore be omitted from the scheme. Furthermore, in the opinion of the Conservation Section, the justification provided for the proposed interventions to these important metal bridges, has not been adequately considered from an architectural heritage perspective.

The proposed route will require significant changes to the area's sensitive and remaining industrial heritage including the separation of the two sets of paired Scherzer Bridges at George's Dock and the Royal Canal to facilitate new four-lane road bridges. Although the proposal outlines that the bridges

would be restored during the process, their movement from their original location would separate them irrevocably from their original setting. Dismantling a structure, no matter how carefully executed and well meaning, can result in damage to the fabric. Moreover, the relocation would impact the industrial heritage landscape, through loss of context and heritage value, and reduce the future understanding of their original function. In essence, they will essentially become meaningless items of street furniture.

The North Wall Quay Scherzer bridges were constructed 1911-12 over the entrance to Spencer Dock from the Liffey. The principle of this type of bridge was patented by William Scherzer in Chicago in 1893. Its use on North Wall Quay is one of the earliest examples of its use in Ireland.



*Image of Scherzer Bridges on North Wall Quay from the Lawrence Collection (National Library of Ireland)*

The bridges used a simple, yet effective lifting mechanism that took up the minimum amount of space, moving on a vertical rather than horizontal plane. The curved end of the bridge, which contains the counterweight, has toothed edges that are fitted into tracks on the ground, reducing the need to provide a pit to take the counterweight and ensuring the bridge is in equilibrium at all stages of the lift. They also did not impinge on either road traffic or docking space. The mechanism of the Scherzer bridges meant they could be raised and lowered within minutes.

Sir John Purser Griffith, Chief Engineer of Dublin Port at the time, designed the bridges, incorporating Scherzer's design. Griffith's use of two single-leaf parallel bridges, which cleverly met the needs of the site, was not unique, though this adaptation was not the most common design. The use of two bridges meant that traffic could continue during construction and also aided efficient traffic flow during lifts. An electric motor was provided to operate the lifting mechanisms, operated from a switchboard in a central cabin. An early image of the bridges on North Wall Quay shows the cabin housing the operating switchboard, which has since been removed.

The efficacy and popularity of the bridges on North Wall Quay is apparent in the repetition of the design at Custom House Quay, over the entrance to George's Dock, in 1932.

Though appearing to be two distinct structures, both sets of paired bridges were effectively constructed as single entities with shared central structures for access and operating. The lifting mechanisms for the North Wall Quay bridges were operated from a central switchboard, located within a cabin positioned between them, and access to this and the tops of the bridges was a shared ladder. The later bridges at Custom House Quay did not have a central tower, they were likely to have a similar shared switchboard and they too share a central gangway. The separation of the pairs would have a significant impact on their special character, in dividing two elements of a single structure, designed to operate in tandem. Their cohesiveness would be lost as a result of this separation. Furthermore, the bridges on North Wall Quay were refurbished in 2003, and still purportedly have the ability to open, with the switchboard protected within a box. Thus the separation of the bridges from their original locations would have an impact on their functionality.

The bridges were constructed to address the specific requirements of their sites. The staggered positions of the Custom House Quay bridges was to accommodate the angle of the channel to Georges Dock, which is not perpendicular with the river channel. The bridges at Custom House Quay no longer have the ability to open, nevertheless their separation would have a significant impact on their grouping and legibility as a single structure, and potentially on the ability to return them to working order in the future. The outer gates of the sea lock linking Spencer Dock to the river is located close to the northern bridge and though the current gates are a later replacement, any movement northwards would impact on the sea lock. The separation of the bridges has the potential to impact on the surviving sea lock at Georges Dock, part of protected structure DCC RPS 3173.

The Scherzer Bridges are Protected Structures and are important elements of the surviving industrial heritage of the Docklands. The significance and value of the city's industrial heritage lies with the structures themselves, surviving components and machinery and the landscape around them. Thus the proposed separation of the bridges will have a fundamental impact on their significance and special interest, removing the legibility of the pairs working in tandem. It will negatively impact on the surviving machinery, altering their ability to operate as per the original design should this be desired in the future. Their positioning vis-à-vis other surviving elements such as the sea locks and the layout of the pre-existing mouths to the two docks is also intrinsic to their design and significance, which would be compromised by the proposed division.

In addition to the negative impact of the proposed development on the above bridges, the scheme will require changes to sections of historic quay walls to accommodate a pedestrian boardwalk at Custom House Quay which will require alterations to capping stones and the fixing of steel plates onto the face of the quay wall with piling into the river bed. Whilst proposed mitigation includes the recording of existing masonry prior to works and the protection of masonry during development, the interventions will result in the permanent loss of localised original fabric. A further proposed boardwalk at Excise Walk, North Wall Quay will require similar interventions and will also have direct and permanent impacts on the historic masonry fabric.

At Britain Quay, the quay wall is proposed to be modified to accommodate a new bridge over the mouth of the Dodder, which has been proposed for some time, where the intended works will require the removal of a 19m section of quay wall.

A section of the sea wall at St Patrick's Rowing Club, constructed in granite and limestone, is proposed to be removed to accommodate the tying in of the existing and proposed cycle and foot paths of the DPTOB as well as the existing Tom Clarke Bridge.

The Conservation Section has concerns that the above interventions, which include the movement or loss of historic structures, would constitute further irreversible erosion of the remaining industrial heritage landscape of the docklands. As already referred to above, the Conservation Area's industrial

heritage has already been severely eroded by previous redevelopment with relatively little remaining. Therefore, the impact of further interventions, such as the relocation of the Scherzer Bridges, would result in an unacceptable diminution of their special interest and meaning within their historic context.

In the light of the severe negative effects highlighted above, the Conservation Section submits that the applicant should review the traffic management layouts at the Scherzer Bridges with a view to eliminating the need for their relocation.

Additionally, the Conservation Section submits that the reporting produced as part of the EIAR does not provide adequate justification for the extent of removal of early fabric in relation to changes to quay walls and requests that further information be provided.

#### Key Impacts

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

- Protected Structures and their settings
  - a) Several Protected Structures are included on the subject map sheets. These structures are located on or adjacent to the route boundary.
  - b) A number of Protected Structures of Industrial Heritage Interest shall be directly negatively impacted by the works. Impacts will be permanent and irreversible. Works will both impact the Protected Structures and their immediate settings.
  - c) The Custom House (DCC RPS 2096) is a building of international importance. Lying to just to the west of the proposed route, it is unlikely to be affected by the scheme.
  - d) Two pairs of Scherzer Bridges at George's Dock (DCC RPS 896) and the Royal Canal (DCC RPS 912) are *proposed to be lifted and* relocated from their historic contexts. Each pair is *proposed to be separated and moved to enable the provision of a four-lane bridges deck between each bridge and set at a distance 1m above the existing road level "to allow for unimpeded navigation of the canal below" with "ground levels ... altered along the quays on approach."* Works would require dismantling and reassembly of the industrial heritage structures. The applicant is requested to fully reconsider the design of the scheme at these locations to lessen the impact on the historic Scherzer Bridges which are a rare example of their type. A full architectural heritage impact assessment by a suitably qualified conservation professional is required for any works to or near these structures.
  - e) At various locations, historic quay walls are proposed to be modified to accommodate the installation of public boardwalks. Sections of Custom House Quay (DCC RPS 8829) and North Wall Quay (RPS 5835) will undergo works to modify capping stones. The loss of early masonry fabric is regrettable. Such modifications constitute incremental change that will alter the visual character of the quay walls along the River Liffey. A full architectural heritage impact assessment by a suitably qualified conservation professional is required for any works to these structures.
  - f) The quay wall at Britain Quay (DCC RPS 8808) is proposed to be altered to accommodate the DPTOB over the mouth of the River Dodder.
  - g) The route will pass by a number of protected structures including Georges Dock (DCC RPS 3173); The CHQ Building – Stack A and Stack C (DCC RPS 2094); CIE Goods Depot (Railway Station) 47-57 North Wall Quay (DCC RPS 5836); a Store/Warehouse at North Wall Quay (DCC RPS 5837); 58-59 North Wall Quay (British Rail Hotel) (DCC RPS 5838); Richford Motors, 73 North Wall Quay (DCC RPS 5840); 81 North Wall Quay (DCC RPS 5841); 82 North Wall Quay (DCC RPS 5842); 3 Arena, North Wall Quay (DCC RPS 5843); George's Quay (DCC RPS 8841); City Quay (DCC RPS 8825); 9 City Quay (DCC RPS 1853); Church of the Immaculate Heart of Mary (DCC RPS 1854); a wall at 21-22 City Quay (DCC RPS 1855-6); Sir John Rogerson's Quay (DCC RPS 7542); 2 Sir John Rogerson's Quay (DCC RPS 7543); 4-5 Sir John Rogerson's Quay (DCC RPS 7544-5); 14-15 Sir John Rogerson's Quay (DCC RPS

7546); 20-24 Sir John Rogerson's Quay (DCC RPS 7547); 30-32 Sir John Rogerson's Quay (DCC RPS 7548); 35-36 Sir John Rogerson's Quay (DCC RPS 7549-50); Diving Bell at Sir John Rogerson's Quay (DCC RPS 7542); Britain Quay (DCC RPS 8808); Fountain at 103 Ringsend Park (DCC 7376); Sea Wall at Pigeon House Road (DCC RPS 6797); and 70 Pigeon House Road (DCC RPS 6782).

h) 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.

- NIAH Structures and their settings

a) All NIAH Structures in close proximity to construction works are to be adequately protected and all proximate works are to be supervised by a conservation professional including works proximal to the Famine Memorial (NIAH 50010002); Rectangular stone wet doc at Custom House Quay/George's Dock (NIAH 50010005); Pair of iron winches at Custom House Quay/George's Dock (NIAH 50010006); Triumphal Arch (NIAH 500011219); Samuel Beckett Bridge (NIAH 50010010); ESB Substation (NIAH 50011185); Industrial Building – Now Demolished (NIAH 50011185); 94 North wall Quay (NIAH 50011168); 3 Sir John Rogerson's Quay (NIAH 50020471); 81 Sir John Rogerson's Quay (NIAH 50020466-7).

- Architectural Conservation Areas

- The proposed route does not pass through any designated ACAs.

- Conservation Areas, Z2 and Z8 Zonings

- The proposed route will pass through three Conservation Areas as indicated on the Dublin City Council Development Plan 2022-2028 map. These include the Liffey Quays conservation area, Royal Canal conservation area, and the Grand Canal and Dodder conservation area.

- The EIAR finds that the Proposed Scheme with Direct and indirect Construction Phase impacts are anticipated on the Liffey Quays Conservation Area. Eight features were identified within the Conservation Area, which it is anticipated, will be directly impacted during the Construction Phase. They are: Seven protected structures including the Scherzer Bridges at George's Dock (DCC RPS 896), associated quay walls at the lock on George's Dock (DCC RPS 3173) and Royal Canal (DCC RPS 912), Custom House Quay (DCC RPS 8829), North Wall Quay (DU018-020564), Sir John Rogerson's Quay (DU018-020201) and Britain Quay (DCC RPS 8808); and One group of lamp posts (CBC0016LP001).

The EIAR states that "regarding the identified direct impacts, it is anticipated that the Proposed Scheme will have a negative impact on the Liffey Quays Conservation Area, the magnitude of which is Medium. The potential direct Construction Phase impact on the Liffey Quays Conservation Area will be Negative, Moderate and Permanent. Indirect impacts are anticipated where the construction works will have an adverse visual impact on the Conservation Area during the Construction Phase. The Proposed Scheme includes the relocation of two bridges in the Conservation Area (i.e. both pairs of Scherzer Bridges), and the construction of one bridge on the south-east boundary of it, crossing the River Dodder (i.e. the DPTOB). Two new sections of boardwalk will also be provided along North Wall Quay and Custom House Quay respectively. The extent, scale and nature of the construction work will have a high impact on the Conservation Area. The potential indirect Construction Phase impact on the Liffey Quays Conservation Area will be Negative, Significant and Short-Term." The Conservation Section agrees the assessment the impacts on the architectural heritage of the Liffey Quays Conservation Area.



- The EIAR describes the impacts on the Royal Canal Conservation Area is of Medium Sensitivity. It states that “Direct and indirect visual Construction Phase impacts are anticipated on the Royal Canal Conservation Area.” The report highlights that “Two features were identified which will be directly impacted during the Construction Phase. They are the Royal Canal Scherzer Bridges (DCC RPS 912), which are protected structures of Medium Sensitivity, and the Royal Canal Sea Lock (CBC0016BTH007), which is recognised through inclusion in the DCIHR, and which is also of Medium Sensitivity. The anticipated impacts on the individual features are assessed in Section 16.4.3.1 and Section 16.4.3.4. Regarding the identified direct impacts, it is anticipated that the impact of the Proposed Scheme on the Royal Canal Conservation Area will have a negative impact, the magnitude of which is Medium. The potential direct Construction Phase impact on the Royal Canal Conservation Area will be Negative, Moderate and Permanent.” The Conservation Section believes the proposed works to the Scherzer bridges will adversely impact the architectural and industrial heritage and must be reconsidered.
  
- The EIAR describes the impact of the Proposed Scheme on the Dodder and Royal Canal Conservation area. It states that “Direct and indirect Construction Phase impacts are anticipated on the Dodder Valley and Grand Canal. A protected structure and feature of built heritage interest, the sea and quay walls on York Road (RMP DU018-066, CBC0016BTH038) both of which are of Medium Sensitivity, were identified in a Conservation Area. It is anticipated that these will be directly impacted by the construction of the DPTOB [road bridge].” It continues that “With regard to the identified direct impacts, it is anticipated that the impact of the Proposed Scheme on the Dodder Valley and Grand Canal Conservation Areas will have a negative impact, the magnitude of which is Medium. The potential direct Construction Phase impact on the Dodder Valley and Grand Canal Conservation Area will be Negative, Moderate and Permanent.” The proposed road bridge, which is to comprise a fixed and opening span, is to be built at the mouth of the River Dodder. Rendered views provided in the submission indicate that the new bridge will be a highly visible piece of infrastructure that will become part of established views and notable vistas. It is therefore essential that the bridge’s design be enduring and of exceptional quality to ensure that it enhances its Conservation Area setting rather than detracting from it.
  
- Industrial Heritage Sites
  - a) In addition to the industrial heritage structures that are discussed above as they are Protected Structures or because of their inclusion in the NIAH, three additional industrial heritage structures, record in the DCHIR are located within the development area. These include: a Royal Canal sea lock at North Wall Quay; a boat slip, c.1920, at York Road; and a syphon house at Pigeon House Road.
  
- Other Structures of Heritage Interest
  - a) The EIAR has established that in addition to the structures included in the RMP, the RPS, NIAH and the DCIHR, 17 structures or groups of structures were identified along the Proposed Scheme which, while they are not included in existing inventories, they are of architectural, historical or industrial interest. These structures include: 1- 4 City Quay which are commercial buildings of c.1910 having granite lined coal chutes to basement in the pavement to front; Quay wall at York Road; a community hall named Mission Hall; and a series of later 19<sup>th</sup> and early 20<sup>th</sup> century houses and cottages at the following addresses 12 York Road, 1-44 Pigeon House Road and 45-103 Ringsend Park, 46-51 Pigeon House Road, Bayview Terrace, 1-10 Cambridge Avenue, 62 and 63 Pigeon House Road, a public park named Ringsend Park, St Patrick’s Villas, St Brendan’s Cottages, St Brendan’s Terrace, 1-4 Strasburg Terrace, Numbers 2, 4, 5, 6, 8, 9, 11 Chapel Avenue, and 1-2 Pembroke Street. Generally, it considered that the



Proposed Scheme will not have any detrimental visual or physical impacts to the above properties.

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

*Lamp Posts:*

- The EIAR has identified a group of 9m Scotch Standards along North wall quay and Custom House Quay. Twelve of the lamps will require slight repositioning to accommodate altered carriage and cycle track width. There is potential for damage to the lamp posts during their removal, transportation, storage and reinstatement.
- The remaining lamps will be retained in position. There is also potential for damage of these lamps during construction.

*Milestones:*

- There are no milestones recorded within DCC's statutory area.

*Historic Paving, Surface Finishes and Other Street Furniture:*

- Paving and surface treatments of architectural heritage value were identified at three locations in the study area. Direct Construction Phase impacts on paving and surface treatments which are associated with protected structures are anticipated at the three locations. These include narrow granite kerbs (CBC0016BTH030), at the Royal Canal Scherzer Bridges (DCC RPS 912); Historic surfaces and embedded rail tracks (CBC0016BTH029) along North Wall Quay (DU018-020564); and Historic surfaces and embedded rail tracks (CBC0016BTH033) along Sir John Rogerson's Quay (DU018-020201).
  - In addition to the three locations identified above where direct Construction Phase impacts are anticipated, three additional areas of significant paving or surface treatments were identified in the study area which are of Medium Sensitivity. These are paving on Custom House Quay (CBC0016BTH031); paving on City Quay (CBC0016BTH032); and paving in front of 30-32 Sir John Rogerson's Quay (CBC0016BTH034).
  - Early stone surfacing and kerb stones will be recorded prior to the commencement of construction, removed to safe storage and will be reinstated on a new line following the completion of works. Works should be overseen by a suitably qualified conservation professional.
- Boundary Treatments
    - The Conservation Section notes that where works may 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 Conservation Areas generally, an alternative high quality cycle lane surface is provided in-lieu of red tarmacadam.
  - New Traffic Semaphore & Signage
    - The proposed new bus lanes and routes may require additional traffic semaphores and signage. Careful consideration shall be given to the siting of associated utilities and traffic

management signage in relation to Protected Structures and Conservation Areas, historic paving and historic street furniture and should be kept to the necessary minimum. Consideration should be given to the rationalisation of all traffic infrastructure such as signage, traffic poles, utility boxes etc. across the route to reduce visual clutter, in particular in the vicinity of Protected Structures, within red-hatched conservation areas and in residential conservation areas. Consideration should be given to the omission of gantry traffic signage in the vicinity of Protected Structures, within red hatched conservation areas and residential conservation areas and alternative traffic signage solutions should be sought.

- Proposed Bus Stops
  - The Conservation Section has reviewed the route in relation to proposed and existing bus stops and shelters. There appears to be not significant visual impact by bus stops or shelters on the Protected Structures and architectural heritage.
  - The location, form and materials of the proposed bus stops / shelters / information posts has the potential to impact upon the character and setting of Protected Structures and Conservation Areas.
  - Mitigation will be required to mitigate the visual impact of bus stops / shelters / information posts sited near or fronting Protected Structures and Architectural Conservation Areas.
  - The treatment of new kerbing and paving associated with the provision of bus stops / shelters / information boards should be appropriate in material and colour to the location, particularly where adjacent sections of historic stone paving and kerbing exist in situ.
  - The alignment of footpaths should respect the setting of Protected Structures and buildings on the NIAH.
  
- Significant Trees
  - On review of the submitted documentation, it appears that there will be no loss of significant trees that could detrimentally impact the setting of Protected Structures or other heritage structures. The Conservation Section notes the inclusion of a biodiversity report within the EIAR that discusses the impacts of removal of trees and other flora on natural habitats.
  
- Construction Compounds
  - The Non-Technical Summary provides the location of four proposed construction compounds:
    - Construction Compound R1: George's Dock Scherzer Bridges along Custom House Quay;
    - Construction Compound R2: Royal Canal Scherzer Bridges along North Wall Quay;
    - Construction Compound R3a/R3b: West of the DPTOB along Sir John Rogerson's Quay;
    - Construction Compound R4: East of the DPTOB at Thorncastle Street / York Road.

It is noted that there are to be two layouts for Compounds R1 and R2: one layout for before works to the Scherzer bridges and one following. The Conservation Section considers there to be a potential risk to the immediate architectural heritage during setting out and operation of the Compounds R1 and R2.

It is noted that proposed Compound 3a and 3b will be located in the area of a Protected Structure (DCC RPS 8088) at Britain Quay which is described in the DCC Record of Protected Structures as "Granite ashlar quay wall with granite coping including granite stone steps, mooring rings & hooks, granite and cast-iron mooring bollards." The scheme will directly impact this Protected Structure as it will need to be altered to accommodate the DPTOB. The EIAR has noted the presence of quay wall (CBC0016BTH038) and a boat slip (CBC0016BTH015) in the area of proposed Compounds which will also be directly affected by the DPTOB. The EIAR

chapter on Architectural Heritage states “The architectural heritage specialist will oversee the recording of the existing masonry in position prior to the works (at low tide) and protection of the fabric for the duration of the construction works. Sections which will be incorporated in the land reclamation will be retained in-situ, though buried.”

During the preparation for and establishment of these construction compounds and construction works in the immediate setting, which lies in a highly sensitive areas, a conservation professional must have sight of the works involved and provide suitable mitigation for or Protected Structures or any features or structures of architectural heritage interest. All heritage structures must be recorded in advance of works. Where a heritage feature or part of a features is to be retained, it is to be adequately protected.

Recommended Conditions are set out in the Appendix below.

#### **2.4.5 City Architects Division Comments**

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 proposals for public realm upgrades, including widened footpaths, high quality hard and soft landscaping to contribute towards a safer, more attractive environment for pedestrians are included, and that it has been developed having regard to relevant accessibility guidance and universal design principles so as to provide access for all users.

The City Architects Division wishes to comment on the proposals, noting the following:

- The design of the public realm will be fundamental to the success of the Proposed Scheme.
- This design needs to be supported by pedestrian traffic counts to ensure that footpaths are of sufficient width to safely accommodate anticipated pedestrian volumes and to provide for ancillary public realm infrastructure such as tree-planting, greening and street furniture, as well as traffic infrastructure such as bus shelters, utility cabinets, and cycle stands etc. Footpaths should be designed to be universally accessible and pedestrian environments enhanced.
- As part of the proposals, all historic fabric and features should be retained and protected, and the settings of protected structures and buildings within Architectural Conservation Areas (ACA's) should be respected insofar as possible within the Proposed Scheme.
- Generally, existing survey drawings are submitted with a project to facilitate analysis and the extent of intervention in a proposal. The General Arrangement Drawings submitted as part of the National Transport Authority's Ringsend 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 Ringsend to City Centre Core Bus Corridor Scheme would have facilitated a better assessment of the impacts of the proposals on the existing public realm.

This issue was raised in previous City Architects commentary.

- Comments will generally be confined to proposed physical interventions in the public realm only, with minimal or no commentary on traffic routing or modelling.

Where drawings are referenced in the commentary, the relevant Drawing Sheet no. from Volume 3, Figures, Chapter 4.2 General Arrangement Drawings is included for ease of reference

### **Building Conservation Legislation**

As this route involves works to and/or adjacent to Protected Structures their curtilage incl. Historic Fabric and within Conservation Areas:

The applicant is to confirm that all works proposed must comply with Part IV of the Planning and Development Act 2000. This includes guidelines under S.52 (1) for the protection of structures, or parts of structures, and the preservation of the character of architectural conservation areas.

For reference, in December 2004, the Minister for the Environment, Heritage and Local Government published guidelines under S.52 (1) entitled Architectural Heritage Protection Guidelines for Planning Authorities which incorporated the S.52 (2) guidelines as Chapter 5.

### **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.
- 7<sup>th</sup> January 2021, City Architects Comments on BusConnects CBC 'preferred routes', published for 3<sup>rd</sup> 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.

### **Commentary by the City Architects Division on the BusConnects Ringsend 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 4.9 Street Lighting

Volume 3, Figures, Chapter 4.10 Junction System Design

Volume 3, Figures, Chapter 17.2 Photomontages

Volume 3, Figures, Chapter 18 Bridges & Major Retaining Structures / Structures General Arrangement

### **Comments**

1. **Footpath widths & alignment:**

- i. The provision of footpaths designed to the minimum width may not be sufficient in areas of high pedestrian traffic.
- ii. Footpath widths also need to account for congregations of passengers waiting in the vicinity of bus stops and pedestrians travelling along the footpath.

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.

## **2. Local Public Realm Improvement Schemes:**

The Proposed Scheme includes limited information on the proposed public realm improvements at;

- i. North and South Campshires (to the west of the Samuel Beckett bridge, and to a lesser extent to the east of the bridge along the north quays), written description, pg 9, Volume 2, Chapter 4 Proposed Scheme Description.
- ii. The Scherzer Bridges at George's Dock, written description, pg 10, & plan drawing pg 10, Image 4.1: Urban Realm at the Historic Scherzer Bridges at Georges Dock, Volume 2, Chapter 4 Proposed Scheme Description.
- iii. The Scherzer Bridges at the Royal Canal, written description, pg 10, Volume 2, Chapter 4, Proposed Scheme Description.
- iv. The DPTOB (River Dodder Public Transport Opening Bridge) linking Sir John Rogersons Quay to Thorncastle St / York Road – the west bank approaches to the DPTOB, the DPTOB itself and the East bank approach to the DPTOB including the landscaped area on York Rd, written description pg 14 & 15, & photomontage pg 14, Image 4.3: Proposed DPTOB & plan drawing, pg 16, Image 4.4: Landscaping on the Approaches to the Proposed DPTOB, Volume 2, Chapter 4 Proposed Scheme Description.
- v. Custom House Quay at the proposed pedestrian boardwalk, written description, pg 10, Volume 2, Chapter 4 Proposed Scheme Description.
- vi. Excise Walk/North Wall Quay junction at the proposed pedestrian boardwalk, written description, pg 11, & plan drawing pg 11, Image 4.2: Proposed Boardwalk at Excise Walk / North Wall Quay Boardwalk, Volume 2, Chapter 4 Proposed Scheme Description.

The information provided is insufficient to facilitate proper assessment of the proposals and additional information is required including visualisations of the proposals.

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

## **3. 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.

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.

## **4. Bus Shelter Design:**

1. 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.



2. Where bus shelters are proposed their locations must have regard to existing building entrances.
3. Bus shelter locations are indicated on the drawings but information on their proposed design, size and type is not provided.

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.

4. The proposed location of bus shelters in the vicinity of buildings of architectural importance and in Conservation Areas needs to be considered carefully. Bus stops only rather than bus shelters would be preferable in Conservation Areas. The vistas and settings of Protected Structures are also impacted by the proposed siting of bus shelters in their vicinity.

By condition, full details of the design and type of each bus shelter for each location along the Proposed Scheme shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

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

By condition, full details of the design and type of each bus shelter for each location along the Proposed Scheme shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

#### **5. Siting of utility cabinets and above-ground utility infrastructure:**

1. 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.
2. This issue has been a significant problem on previous transport infrastructure projects.

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.

#### **6. On-street Parking:**

1. The roll-out of electric charging points for electric vehicles is required if national carbon emissions plans are to be met.

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.

#### **7. Palette of materials:**

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

For example under the Proposed Scheme the existing concrete flagged footpath on Custom House Quay at the IFSC building are to be replaced with in-situ concrete. This is not acceptable (Sheet 01 Volume 3, Figures, Chapter 4.5 Landscaping General Arrangements).

Under the Proposed Scheme it is proposed to maintain in-situ concrete footpaths on the south-side of City Quay however it is considered that these footpaths should be upgraded to match the paved footpaths adjacent (Sheet 01 Volume 3, Figures, Chapter 4.5 Landscaping General Arrangements).

By condition, the extent and condition of existing hard landscape to be retained within the Proposed Scheme shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

2. Stone or concrete sett paving is proposed for raised tables at side road entries. All proposed materials are to be agreed and approved by Dublin City Council, Environment & Transport Department.

By condition, the material palette within the Proposed Scheme shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

#### **8. Palette of street furniture:**

1. 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.
2. 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.
3. Confirmation is sought as to whether there will be uniformity in the palette of street furniture across all the BusConnects Core Bus Corridor Schemes.

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.

#### **9. Boundary treatments:**

1. 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.

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.

2. 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.

By condition, the fabric in all property boundaries which are to be relocated to facilitate land acquisition along the Proposed Scheme should be assessed whether it may be suitable for repair and re-use for sustainability reasons in the new boundaries rather than replaced with new. This assessment should be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

#### **10. Structures in Proposed Scheme:**

1. Scherzer Bridges at Georges Dock

A Conservation Impact statement and a Conservation Method statement is requested for the proposed works to the Scherzer Bridges at Georges Dock, associated works to the Liffey Quay walls and the works required for the proposed new road bridge at Georges Dock (Sheet 19, 1 & 2, Volume 3, Figures, Chapter 18 Bridges & Major Retaining Structures / Structures General Arrangement). While 'Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric' has been submitted as part of the application this document is quite general in nature and we would request more detail of the Conservation Works to the bridge and quay walls.

Confirmation is requested that the original lifting systems for the Scherzer bridges which form part of the structure of the bridge are to be maintained intact even if the bridges are no longer functional.

The historic edges of the lifting bridge on the horizontal should be maintained when the bridges are relocated as this provides an acknowledgement to the historic functioning of the bridge. If it isn't proposed to maintain the edges then we would request that the edges of the former opening sections be represented by a change in paving material.

## 2. Scherzer Bridges at North Wall Quay/ Royal Canal & Royal Canal Road Bridge

A Conservation Impact statement and a Conservation Method statement is requested for the proposed works to the Scherzer Bridges at North Quay Wall/ Royal Canal, associated works to the Liffey Quay walls and the works required for the proposed new road bridge over the Royal Canal (Sheet 20, 1 & 2, Volume 3, Figures, Chapter 18 Bridges & Major Retaining Structures / Structures General Arrangement). While 'Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric' has been submitted as part of the application this document is quite general in nature and we would request more detail of the Conservation Works to the bridge and quay walls.

A reasoning to why the Scherzer Bridges are to be re-orientated in addition to being relocated is also requested. It would be better Conservation practise from a historic point of view to maintain the existing orientation. The reasoning to re-orientate the bridges needs to be clearly justified (View 9 proposed & View 9 Baseline, Volume 3, Figures, Chapter 17.2 Photomontages).

Confirmation is also requested that the original lifting systems for the bridges which form part of the structure of the bridge are to be maintained intact even if the bridges are no longer functional.

The historic edges of the lifting bridge on the horizontal should be maintained when the bridges are relocated as this provides an acknowledgement to the historic functioning of the bridge. If it isn't proposed to maintain the edges then we would request that the edges of the former opening sections be represented by a change in paving material.

## 3. Pedestrian Boardwalk at North Wall Quay

A Conservation Impact statement and a Conservation Method statement is requested for the proposed works to the Liffey Quay walls associated with the new pedestrian boardwalk at North Wall Quay (Sheet 1 & 2, Volume 3, Figures, Chapter 18 Bridges & Major Retaining Structures / Structures General Arrangement). While 'Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric' has been submitted as part of the application this document is quite general in nature and we would request more detail of the Conservation Works to the Quay walls.

## 4. Pedestrian Boardwalk at Custom House Quay

A Conservation Impact statement and a Conservation Method statement is requested for the proposed works to the Liffey Quay walls associated with the new pedestrian boardwalk at Custom House Quay (Sheet WWRC Boardwalk Structural Layout Plan, WWRC Boardwalk Western Structural Layout Plan & Details, WWRC Boardwalk Eastern Structural Layout Plan & Details, Volume 3, Figures, Chapter 18 Bridges & Major Retaining Structures / Structures General Arrangement). While 'Appendix A16.3

Methodology for Works Affecting Sensitive and Historic Fabric' has been submitted as part of the application this document is quite general in nature and we would request more detail of the Conservation Works to the Quay walls.

By condition, a Conservation Impact Statement and a Conservation Method Statement addressing all of the above works are to be submitted and agreed with DCC Planning and Conservation section prior to commencement of development.

#### **11. Per cent for Art Strategy:**

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

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.

#### **12. Traffic Signal & Signage Poles:**

1. The number of poles installed to provide traffic signals for pedestrians, cyclists, buses and other vehicles needs to be rationalised to the minimum required at each junction.

By condition, the number of poles required for traffic signal and signage needs to be designed to the minimum. This information shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

#### **13. Water Drinking Fountains:**

1. 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, should be incorporated into the Proposed Scheme at suitable locations and in consultation with Dublin City Council.

By condition, suitable locations for water drinking fountains should be identified and installed 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.

#### **14. Gantry Signage – Traffic Signals: Discrepancy in documents submitted**

1. Chapter 04 proposed Scheme Description, Section 4.6.10 Other Street Infrastructure, Section 4.6.9.1.2 Gantry Signage states that " No new gantry signage is included in the Proposed Scheme". It is considered that gantry signage is not suitable in low speed areas particularly Conservation Areas due to their high visual impact.

The following is a non-exhaustive list of locations where gantry poles are proposed for traffic signals in the Proposed Scheme.

Gantry traffic signal signage is indicated at the junction of -

1. Sean O'Casey bridge / Custom House Quay (Sheet 02, Junction Systems Design, Volume 3, Figures, Part 2, Chapter 4.10 Junction System Design) adjacent to the Scherzer Bridges, National Monuments and protected structures (NIAH 50010001 & DCC RPS 896) and the CHQ building, a protected structure (DCC RPS 2094),

2. North Wall Quay / Commons Street (Sheet 03 Junction Systems Design, Volume 3, Figures, Part 2, Chapter 4.10 Junction System Design), North Wall Quay/ Excise Walk (Sheet 04, Junction Systems Design, Volume 3, Figures, Part 2, Chapter 4.10 Junction System Design),

3. Samuel Beckett bridge / North Wall Quay, (Sheet 05, Junction Systems Design, Volume 3, Figures, Part 2, Chapter 4.10 Junction System Design) adjacent to the Scherzer bridges, National Monuments and protected structures ( NIAH 50010009 & DCC RPS 912).

The photomontages provided for the scheme, Volume 3, Figures, Chapter 17.2 Photomontages, omit to show the proposed gantry traffic signals e.g. R\_View G2a Proposed and R\_View G2x proposed. The photomontages should be resubmitted showing the proposed gantry traffic signage to properly assess the visual impact of the gantry traffic signals on the settings and views of the protected structures and historic monuments along the Proposed Scheme.

By condition, gantry traffic signage should not be included in the scheme due to their high visual impact as the Liffey Quays are a Conservation Area and alternative traffic signage solutions should be investigated. Photomontages to be re-submitted showing any proposed gantry traffic signals. This information shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

### **15. Interactions with Other Planned Infrastructure Projects**

Further information is requested setting out clearly how the Proposed Scheme will interact with other infrastructure projects planned within the vicinity of the Proposed Scheme, outlined in pg 26 & 27, Volume 2, Chapter 4 Proposed Scheme Description, Section 4.6.6.3. These projects are listed below:

1. North and South Campshires Public Realm Scheme (east of Samuel Beckett Bridge)
2. Blood Stoney Road to New Wapping Street Pedestrian Bridge Scheme
3. Liffey Cycle Route
4. Tom Clarke East Link Bridge Widening and adjoining Point Footbridge Scheme
5. East Wall Road & 3Arena Junction Upgrade Scheme
6. Poolbeg Strategic Development Zone (SDZ)

By condition further information is requested on the interface of the Proposed Scheme with the other infrastructure projects listed above and this shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

### **16. Saint Patricks Rowing Club House Building:**

The design of the elevations of the proposed new rowing club clubhouse should be reviewed to reflect its landmark location and the materiality of the existing buildings surrounding it (Photomontage View 12 Baseline & View 12 proposed, Volume 3, Figures, Chapter 17.2 Photomontages and Sheet 17&18 & 1-3, 1 & 2, Volume 3, Figures, Chapter 18 Bridges & Major Retaining Structures / Structures General Arrangement).

By condition further information on the elevation treatment and materials is requested and shall be submitted to, and agreed in writing with, the planning authority with assistance from DCC City Architects Division as necessary, prior to commencement of development.

### **2.4.6 City Parks, Biodiversity and Landscape Division Comments**

1 Upon review of the Bus Connects CBC Ringsend to City Centre planning application package we make the following recommendations for issue to the Planning Department as part of the An Board Pleanala application.



Parks would like to register their views on the proposed Ringsend City Centre Bus Connects Scheme, in particular the proposal for Ringsend Park. Parks are not supportive of a proposal that provides a route through the park for **commuting** cyclists whose speed will be at odds with the public using the Park. There is lack of detail relating to the width of the proposed path within Ringsend Park, but the current width of 2.3m will be insufficient for a shared scheme and will necessitate widening to avoid conflict between cyclists and pedestrians. The construction of an extra wide combined footpath/cycle path through the root zone of the existing trees will very likely cause damage to the trees that line the path which have an important cultural and biodiversity value. There are existing soccer and GAA pitches on the adjacent lawn area that are already close to the existing footpath with safety run off zones leaving little to no room for widening of the existing footpath. These pitches are heavily used by both male and female teams with a huge deficit of playing fields in the area. It should also be noted the danger of having a sports field close to a 'fast' cycletrak.

The green spaces along Strand Street, Bayview and Beach Road (which under the proposal are to accommodate a two lane cycletrack) will inevitably result in damage to the root zone of the existing trees and result in their decline. The proposal will also result in fragmentation of these open spaces.

A suggested solution would be for cyclists to utilise the existing quiet streets that run adjacent to and in the vicinity of Ringsend Park e.g. Cambridge Road, Pembroke Street and the existing excellent cycling infrastructure on Sean Moore Road. Cyclists could stay on these quieter road as is proposed for Pigeon House Road.

Clarification is also sought on the use of the open green space

General GA Plans and Landscape Plans Comments /Conditions.

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.
2. The plans as per previous issues appear more like concept or outline plans and not to the detail you would expect for planning.
3. There are no dimensions and no sections with before and after levels and build ups etc. These would not pass our Part 8 requirements and would unlikely be deemed acceptable for a standard planning application.
4. There is a real shortage of detail on the plans which would be required to make an informed opinion on them, this includes a lack of clarity where footways and kerbs are getting reduced or widened, no street lighting or signage is shown on the GA or Landscape Plans, we have no knowledge of service runs, utility cabinets or other street fixings which would impact on pedestrian comfort, safety, trees and ability to install green infrastructure in future.
5. This department requests that all soft landscape proposals are agreed with the department prior to detail design.
6. 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.
7. We recommend that a Tree Bond be agreed with DCC Parks Landscape and Biodiversity Section for each proposed retained tree.
8. 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 with 15 cu.m of growing medium, details of these pits should be agreed with this department.

## **2.5 Conclusion**

The proposed Ringsend 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 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 is consistent with, and supported by, the statutory Dublin City Development 2022-2028. However, there are a number of areas within the Proposed Scheme which, in the opinion of the Planning Authority, require greater detail and in some instances reconsideration in particular the proposed alterations to the Scherzer Bridges and impacts of the Proposed Scheme on other protected elements such as the quay walls. 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 Appendix 1 attached to this report.

## **APPENDIX 1**

### **Recommendations/Conditions**

#### **Agreed conditions - Between Dublin City Council (DCC) and the National Transport Authority (NTA)**

1. That a comprehensive agreement is put in place between DCC and the NTA regarding how the corridor is to be handed over to the NTA and its contractors, what pre-inspection and recording of the corridor is necessary and how the corridor is to be maintained during construction activities and by whom. The agreement shall also address the handback process, the treatment of all relevant records treated and how the corridor is to be accepted back by DCC following construction.
2. Following handback, a separate agreement shall be put in place between DCC and the NTA regarding the costs of maintenance of the corridor as a high quality public transport corridor with agreed levels of performance and how the performance of the public transport corridor is not eroded in the future.
3. All relevant DCC departments involved with the development of the Scheme shall be consulted during the detailed design development process for the Scheme and the NTA shall incorporate the requirements of the DCC departments into the final detailed design of the Scheme.

#### **Department Recommendations/ Conditions**

##### **Roads Division Standard Conditions**

###### **Handover:**

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

###### **Existing Condition Record:**

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

###### **Design:**

5. Final details (including materials, finishes, sizes, gradients, levels and drainage) of all junctions, carriageways, islands, buildouts and footways as well as all signal/traffic light infrastructure shall be agreed with DCC prior to construction.
6. All Construction works shall comply with the "Construction Standards for Roads and Street Works in Dublin City Council".
7. Road Safety Audits shall be carried out for each public road that is to be modified as part of the Bus Connects scheme works at appropriate stages throughout the design of each individual scheme.

8. The alignment of the Bus Connects scheme shall be designed so as ensure that all longitudinal gradients and crossfalls on carriageways, islands, buildouts and footways are in accordance with those specified in "Construction Standards for Road and Street Works in Dublin City Council" unless otherwise agreed with DCC.
9. Pedestrian priority shall be ensured throughout the Scheme design through signage and physical design measures where appropriate.
10. Buffer strips shall be provided at all locations where cycle lanes run between parking and loading areas and the kerb/footpath to ensure pedestrians including those with disabilities can safely alight from vehicles.
11. The Scheme shall ensure that principles of universal design are adhered to and accessibility requirements are met throughout the Scheme.
12. Modifications to existing 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. Driveway entrances should be maximum 3m width in accordance with the standards set out in Dublin City Development Plan 2022-2028.
13. 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.
14. All signage and road markings to comply with the *Traffic Signs Manual*.

**Reinstatement:**

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

**Construction Period:**

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

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

#### **Miscellaneous**

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

#### **Public Lighting Recommendations/Conditions**

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.
3. All heritage public lighting must be safeguarded and protected and any requirements to move heritage columns must be agreed with the Public Lighting department..
4. Temporary Lighting: If the route where works are being carried out remains open for public use, e.g. to facilitate the continued movement of vehicles and pedestrians, then the route must be lighted at all times during night time hours.

#### **Environmental Protection Division Recommendations/Conditions**

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. There are opportunities to include Nature Based Solutions that have not been realised in the outline design. These shall be addressed at detailed design stage with areas discharging to the River Liffey being particularly important. Attenuation design to be revisited, current design is not clear.
4. 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 would be preferable in instances where this could be achieved. The developer shall explore all opportunities to segregate the surface water from the combined drainage system. Details on proposed connection locations to the surface water network and flow discharges shall also be agreed.
5. To support our achievement of our legislative obligations the Ringsend to City Centre Core Bus Corridor Scheme proposal should not cause a deterioration of the status of any waterbody to which it is contiguous with downstream and furthermore should not jeopardise the attainment of good ecological and 'good' water chemical status for the River Liffey Estuary 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.
6. 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.
7. The developer must demonstrate that this development passes the three stages of the SFRA Justification Test, particularly for tidal and fluvial flooding.
8. New compensatory SuDS measures should be provided close to any green areas lost.
9. As-built drawings of all drainage networks and SuDS measures shall be provided by the NTA on completion of the works.

#### **Air and Noise Pollution Control Unit Recommendation/Conditions**

1. Noise Control and Air Quality Control - Demolition and Construction Phase

It is recommended that the works must be carried out having regard to a Construction Management Plan submitted with the application. The plan must be written having regard to this Unit's Good Practice

Guide for Construction and Demolition (below link). The plan must be approved by the Planning Department before work commences.

<https://www.dublincity.ie/residential/environment/air-quality-monitoring-and-noise-control-unit/good-practice-guide-construction-and-demolition>

### **Archaeology Recommendation/Conditions**

1. Industrial Heritage  
Update the EIAR to contain revised proposals for the Scherzer Bridges and fully evaluate options for retention in situ.
2. Public Artwork  
Update the Cultural Heritage Impact Assessment to include an impact assessment and mitigation strategy for the 'Free Flow' sculpture.
3. Archaeology
  - (a) NTA to appoint a Project Archaeologist as a member of the NTA project team to oversee all archaeological aspects of the project from inception to completion. 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.
  - (b) The Project Archaeologist shall ensure that the process of identifying the potential impact the project on archaeology is dealt with by a competent archaeologist.
  - (c) The Project Archaeologist shall oversee the archaeological operations carried out by the contractor's archaeological consultant.
  - (d) The Project Archaeologist shall 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.
  - (e) The Project Archaeologist shall 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.
  - (f) The NTA shall 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.
  - (g) The Project Archaeologist shall ensure the publication and/or dissemination, as appropriate, the archaeological results of the project.
  - (h) The Project Archaeologist shall copy Dublin City Council Archaeology Section with all Section 26 method statements and any reports arising and provide regular updates on finds and mitigation throughout the delivery of the scheme through to completion.
  - (i) The Project Archaeologist shall ensure that the primary archaeological paper archive for all archaeological site investigations be prepared and deposited with the Dublin City Archaeological Archives within a timeframe to be agreed with the planning authority unless otherwise agreed with the Minister.

### **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 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 2022-2028, the *Architectural Heritage Protection Guidelines for Planning Authorities (2011)* and relevant documents of the DHLGH Advice Series.
2. The Conservation Section recommends the following specific measures:
  - a) Revision of the proposed scheme to provide for the retention-in situ of the two pairs of Scherzer Bridges at George's Dock (DCC RPS 896) and the Royal Canal (DCC RPS 912), which are Protected Structures, and/or other such redesign to minimise the physical and visual impact on the rare metal bridges. Details to be submitted for written approval of the Planning Authority in advance of works commencing.
  - b) An architectural heritage impact assessment to be undertaken by a suitably qualified conservation professional for all proposed alterations to the Scherzer Bridges and quay walls, outlining the nature and likely impacts and proposals to minimise the impacts on the historic fabric, to be submitted for the written approval of the Planning Authority in advance of works commencing.
  - c) An architectural heritage impact assessment for the boardwalk elements and proposals to reduce the impacts on the historic fabric to be submitted for the written approval of the Planning Authority in advance of works commencing.
  - d) An architectural heritage impact assessment for the proposed site compounds, including proposals to reduce their impacts on the historic fabric, to be submitted for the written approval of the Planning Authority in advance of works commencing.
  - e) Full details of the design and type and location of each bus shelter / stop along the proposed route in front of Protected Structures and structures on the NIAH to be submitted to and agreed in writing with the Planning Authority in advance of works commencing.
  - f) Consideration to be given for the omission of bus shelters in front, and in the immediate vicinity, of Protected Structures across the route and for bus stops only to be provided at these locations, in order to minimise visual clutter and protect the special architectural character of Protected Structures. Details to be confirmed in writing to the Planning Authority in advance of works commencing.
  - g) Consideration to be given to the rationalisation of all traffic infrastructure such as signage, traffic poles, utility boxes etc. across the route to reduce visual clutter, in particular in the vicinity of Protected Structures, within red-hatched conservation areas and in residential conservation areas.
  - h) Consideration to be given to the omission of gantry traffic signage in the vicinity of Protected Structures, within Conservation Areas, red hatched conservation areas and residential conservation areas and alternative traffic signage solutions should be sought.

- i) Where cycle ways are located in close proximity to Protected Structures and within Conservation Areas generally, consideration shall be given to an alternative high quality cycle lane surface in-lieu of red tarmacadam.
  - j) The alignment of footpaths should respect the setting of Protected Structures and buildings of National importance.
3. 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.
  4. 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 in advance of works commencing.
  5. 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.
  6. 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, or Conservation Area.
  7. 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.
  8. All existing original architectural heritage features, in the vicinity of the works shall be protected during the course of all phases of construction works.
  9. All repair of historic fabric shall be scheduled and carried out by appropriately experienced conservators of historic fabric.

**City Architects Recommended Conditions**

1. Footpath widths and Alignment:  
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.

2. Local Public Realm Improvement Schemes:  
The information provided is insufficient to facilitate proper assessment of the proposals and additional information is required including visualisations of the proposals.  
Detailed drawings and specifications of the proposed public realm improvement schemes shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.
3. Land Acquisition by NTA and Taking in Charge:  
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.
4. Bus Shelter Design:  
Full details of the design and type of each bus shelter for each location along the Proposed Scheme shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.
5. Siting of utility cabinets and above-ground utility infrastructure:  
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.
6. On-street Parking:  
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.
7. Palette of Materials:
  - (j) The extent and condition of existing hard landscape to be retained within the Proposed Scheme shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.
  - (k) The material palette within the Proposed Scheme shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.
8. Palette of Street Furniture:  
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.
9. Boundary treatments:
  - (a) 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.
  - (b) The fabric in all property boundaries which are to be relocated to facilitate land acquisition along the Proposed Scheme should be assessed whether it may be suitable for repair and re-use for sustainability reasons in the new boundaries rather than replaced with new. This assessment should be submitted to, and agreed in writing with, the planning authority prior to commencement of development.
4. Structures in Proposed Scheme:  
Conservation Impact Statement and a Conservation Method Statement addressing the Scherzer Bridges at George's Dock, Scherzer Bridges at North Wall Quay/Royal Canal and Roylea Canal Road Bridge all of the above works are to be submitted and agreed with DCC Planning and Conservation section prior to commencement of development.
5. Per cent Art Strategy  
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.
6. Traffic Signal and Signage Poles



The number of poles required for traffic signal and signage needs to be designed to the minimum. This information shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

7. Water Drinking Fountains:  
Suitable locations for water drinking fountains should be identified and installed 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.
8. Gantry Signage – Traffic Signals  
Gantry traffic signage should not be included in the scheme due to their high visual impact as the Liffey Quays are a Conservation Area and alternative traffic signage solutions should be investigated. Photomontages to be re-submitted showing any proposed gantry traffic signals. This information shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.
9. Interactions with Other Planned Infrastructure Projects  
Further information is requested on the interface of the Proposed Scheme with the other infrastructure projects listed above and this shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.
10. St. Patrick's Rowing Club Clubhouse Building:  
Further information on the elevation treatment and materials is requested and shall be submitted to, and agreed in writing with, the planning authority with assistance from DCC City Architects Division as necessary, prior to commencement of development.

#### **Parks Division Recommended Conditions**

1. This department requests that all soft landscape proposals are agreed with the department prior to detail design.
2. 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.
3. We recommend that a Tree Bond be agreed with DCC Parks Landscape and Biodiversity Section for each proposed retained tree.
4. 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 with 15 cu.m of growing medium, details of these pits should be agreed with this department.

