



Clongriffin to City Centre Core Bus Corridor Scheme

NTA Observations on the Proposed Scheme Submissions and CPO Objections

July 2022

**BUS
CONNECTS**

SUSTAINABLE TRANSPORT FOR A BETTER CITY.

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1. Introduction

1.1 Introduction

This report provides a response to the submissions and objections made to An Bord Pleanála (“the Board”) in response to the following:

- *the application under Section 51 of the Roads Act 1993, as amended, for approval of the Clongriffin to City Centre Core Bus Corridor Scheme (“the Proposed Scheme”); and*
- *the Clongriffin to City Centre Core Bus Corridor Scheme Compulsory Purchase Order 2022 (“the CPO”).*

An overview of the submissions and objections is provided in Section 1.2 below. The issues raised in the submissions on the Proposed Scheme, together with responses thereto are provided in Section 2. The issues raised in the objections to the CPO, together with the relevant responses, are provided in Section 3. There is:

- a significant degree of overlap between many of the issues raised in submissions on the Proposed Scheme; and
- some overlap between the issues raised in certain submissions on the Proposed Scheme and objections to the CPO, which are highlighted in the relevant section.

Where the same issue is raised in a number of submissions and/or objections, this report identifies the individuals who raised those issues and provides a composite response to each issue raised.

1.2 Overview of Submissions and Objections Received

A total of 125 submissions and objections were received by the Board; 95 submissions in response to the Proposed Scheme and 30 objections to the associated CPO.

Each submission and each objection were individually numbered by the Board and this numbering system has been retained for ease of reference in this report.

The 95 submissions in response to Proposed Scheme are broken down into groups either associated with a particular location along the Corridor or of a more general nature below. Of the 95 submissions, 83 related to single site specific locations, 3 related to more than one location and 9 related generally to the whole scheme. Table 1.2.1 below sets out the locations referred to, the number of submissions on the Proposed Scheme referring to each location and the key issues raised by the submissions.

Table 1.2.1: Summary of Submissions in Response to the Proposed Scheme

	Location	No. of submissions on the Proposed Scheme referencing this Location	Key Issues Raised
1	Ayrfield Drive	64	Proposed new pedestrian / cyclist link from Ayrfield Drive to Malahide Road by opening of wall adjacent to Malahide Road
2	Haverty Road	6	Closure of Haverty Road to through traffic
3	Artane Cottages Lower	4	New bus stop location (9 identical objections also made in relation to the CPO)
4	Other specific locations	3	Various
5	Whole Scheme	9	Various
6	Individual properties	13	Land acquisition from property (13 identical Objections also made in relation to the CPO)

Of the 30 objections to the CPO, 9 were the same as submission 08 made on the Proposed Scheme from six of the properties at Artane Cottages Lower (all 9 of the individuals who made objections to the CPO were signatories to submission 08 made on the Proposed Scheme). These 9 objections to the CPO objected to a new bus stop location but stated they did not object to CPO relating to a small piece of land at the front of a shared lane way is proposed to be acquired.

Each of the remaining 21 objections to the CPO related to the acquisition of land from an individual plot and 13 of these objections were the same as submissions made in response to the Proposed Scheme. The remaining 8 objections being made in relation to the CPO only. Table 1.2.2 below sets out the locations referred to, the number of CPO objections and the key issues raised by the objections.

Table 1.2.2: Summary of Submissions in Response to the CPO

Location	No. of CPO objections that Referred to this Location	Key Issue Raised
Artane Cottages Lower (submission also made in response to Proposed Scheme)	9	New bus stop location at Artane Cottages Lower; (no objection made to the CPO relating to land acquisition from a shared laneway)
Individual properties at dispersed locations (submission also made in response to Proposed Scheme)	13	Land acquisition from property
Individual properties at dispersed locations (no submission made in response to the Proposed Scheme)	8	Land acquisition from property

At the first three locations identified in Table 1.1 relating to the Proposed Scheme the issues raised by those who made submission were very similar. Therefore, for ease of reference and to avoid excessive repetition, Section 2 of this report has a sub-section for each of these locations, with all the issues raised in the submissions identified, considered and responded to.

The location(s) referred to by each objection to the CPO and each submission in response to the Proposed Scheme shown in Table 1.2.3 and Table 1.2.4 below.

Table 1.2.3: Location Referred to by each Objection to the CPO (by ABP Reference Number)

No	Location	No	Location	No	Location	No	Location
1	Artane Cottages Lower	9	Artane Cottages Lower	17	The Mornington Center	25	Maypark
2	Artane Cottages Upper	10	Artane Cottages Lower	18	Maypark	26	Maypark
3	Artane Cottages Lower	11	Mornington Park	19	210 Malahide Road	27	Maypark
4	Mornington Park	12	Artane Cottages Lower	20	The Goblet Bar and Lounge	28	Maypark
5	Artane Cottages Lower	13	Artane Cottages Lower	21	Mornington Park	29	Maypark
6	Maypark	14	Artane Cottages Lower	22	Mornington Park	30	Winston Ville
7	Winston Ville	15	Maypark	23	Maypark		
8	Artane Cottages Lower	16	28 Malahide Road	24	Mornington Park		

Table 1.2.4: Location(s) Referred to by each Submission on the Proposed Scheme (by ABP Reference Number)

No Location		No Location		No Location		No Location	
1	Mornington Park	24	Donnycarney	49	Ayrfield Drive	72	Haverty Road
2	Whole scheme	25	Ayrfield Drive	50	Ayrfield Drive	73	Whole scheme
3	Whole scheme	26	Ayrfield Drive	51	Ayrfield Drive	74	Whole scheme
4	Ayrfield Drive	27	Ayrfield Drive	52	Ayrfield Drive	75	Maypark
5	Malahide Road	28	Ayrfield Drive	53	Ayrfield Drive	76	Malahide Road
6	Malahide Road	29	Ayrfield Drive	54	Ayrfield Drive	77	Ayrfield Drive
7	Mornington Park	30	Ayrfield Drive	55	Ayrfield Drive	78	Ayrfield Drive
8	Artane Cottages Lower	31	Ayrfield Drive	56	Clarehall	79	Haverty Road
9	Ayrfield Drive	32	Ayrfield Drive	57	Ayrfield Drive	80	Ayrfield Drive
10	Whole scheme	33	Ayrfield Drive	58	Ayrfield Drive	81	Haverty Road
11	Ayrfield Drive	34	Ayrfield Drive	59	Whole Scheme	82	Ayrfield Drive
12	Ayrfield Drive	35	Mornington Park	60	Ayrfield Drive	83	Artane Cottages Lower
13	Ayrfield Drive	36	Ayrfield Drive	61	Mornington Park	84	Malahide Road
14	Haverty Road	37	Ayrfield Drive	62	Ayrfield Drive	85	Ayrfield Drive
	Ayrfield Drive	38	Ayrfield Drive	63	Ayrfield Drive	86	Ayrfield Drive
	Artane Cottages Lower	39	Ayrfield Drive	64	Mornington Park	87	Ayrfield Drive
15	Haverty Road	40	Ayrfield Drive	65	Malahide Road	88	Ayrfield Drive
16	Ayrfield Drive	41	Ayrfield Drive	66	Ayrfield Drive	89	Ayrfield Drive
17	Ayrfield Drive	42	Ayrfield Drive		Artane Cottages Lower	90	Ayrfield Drive
18	Ayrfield Drive	43	Whole scheme	67	Ayrfield Drive	91	Ayrfield Drive
19	Ayrfield Drive	44	Ayrfield Drive	68	Maypark	92	Ayrfield Drive
20	Ayrfield Drive	45	Ayrfield Drive	69	Ayrfield Drive	93	Ayrfield Drive
21	Ayrfield Drive	46	Maypark	70	Ayrfield Drive	94	Ayrfield Drive
22	Ayrfield Drive	47	Ayrfield Drive		Buttercup Park	95	Whole scheme
23	Ayrfield Drive	48	Haverty Road	71	Whole scheme		

2. Response to Submissions on Proposed Scheme

2.1 Proposed New Link to Ayrfield Drive

2.1.1 Location of Ayrfield Drive and Existing Environment

Location

Ayrfield Drive is part of the wider Ayrfield residential estate located to the east of the Malahide Road, adjacent to the route of the Proposed Scheme. There is a continuous boundary wall between the estate and the Malahide Road, which prevents any direct access/egress other than at the existing access points on Blunden Drive and Tonlague Road, see Figure 2.1.1 below.



Figure 2.1.1: Location of Ayrfield Drive and Proposed new Pedestrian / Cyclist Link (Image Source: Google)

As shown in Figures 2.1.2, 2.1.3 and 2.1.4 below, between numbers 45 and 47 Ayrfield Drive there is a green area where it is proposed to remove a section of the existing boundary wall and open up Ayrfield Drive to the Malahide Road via a proposed new pedestrian and cyclist link.



Figure 2.1.2: Location of Green Area and Proposed new Pedestrian / Cyclist Link (Image Source: Google)



Figure 2.1.3: View of Green Area from Ayrfield Drive (Image Source: Google)

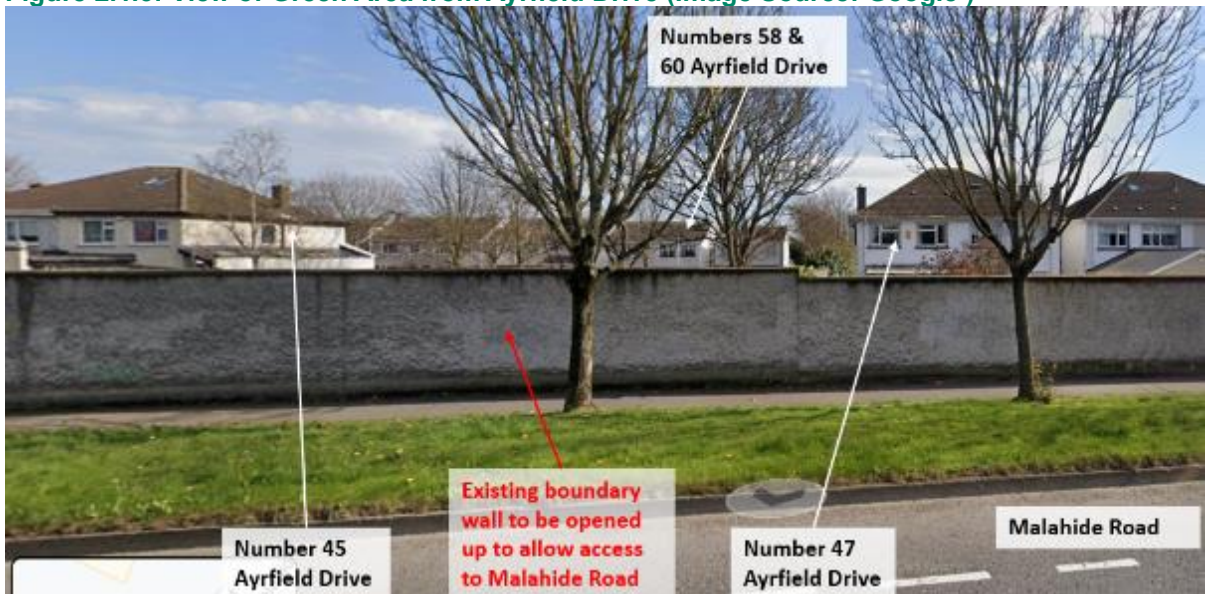


Figure 2.1.4: View of Boundary Wall to Green Area from Malahide Road (Image Source: Google)

Existing Travel Data

Section 10.2.1.1 of the EIAR Volume 2 Chapter 10 Population, includes the assessment of impacts on community amenity, land take and accessibility consisting of 'community areas', which are informed by the Central Statistics Office (CSO) 2016 Census parish boundaries (CSO 2016a). One of these community areas is Ayrfield.

Section 10.3.2.3 of EIAR Chapter 10 provides data on the method of travel to work for each of these community areas and the results are presented in Table 10.5 of that section, which is shown in Figure 2.1.5 below.

Table 10.5: Method of Travel to Work for Bus, Train, Car and Foot / Bike (%) (CSO 2016b)

Community Area	Travel by Bus / Minibus or Coach	Travel by Car / Van	Travel by Train	Travel by Foot / Bike	Other
Donaghmede	12%	55%	16%	9%	8%
Ayrfield	17%	62%	6%	9%	6%
Darndale	23%	47%	2%	19%	9%
Ardlea	23%	54%	4%	13%	7%
Coolock	23%	51%	4%	14%	7%
Artane	14%	51%	16%	13%	5%
Killester	8%	47%	23%	14%	8%
Donnycarney	22%	50%	6%	17%	5%
Marino	19%	46%	4%	23%	8%
Clontarf (St. Anthony's)	13%	47%	12%	20%	7%
Fairview	22%	31%	5%	34%	8%
Study Area Average	18%	49%	9%	17%	7%
County Dublin	12%	54%	8%	17%	9%

Figure 2.1.5: Table 10.5 of EIAR Chapter 10

As can be seen from Figure 2.1.5, of the 11 Community Areas assessed Ayrfield has the highest car mode share for travel to work trips at 62%. In addition, it is noted that this mode share exceeds the average mode share for County Dublin as a whole. This is also noted in section 11.3.4 of EIAR Chapter 11 Human Health.

2.1.2 Description of Proposed Scheme at this Location

As described in section 4.5.1.1 of Chapter 4 of the EIAR, between Priorswood Road Junction and Newton Cottages the Proposed Scheme includes a new pedestrian footpath and cycle track through an existing green area. This new link will connect directly Ayrfield Drive with the Malahide Road adjacent to proposed bus stops serving each direction including a new toucan crossing for safe access and provide a much shorter route for residents and visitors to access high-frequency reliable public transport services, safe segregated cycling facilities and pedestrian facilities. The creation of this new pedestrian footpath and cycle track will require the removal of a short section of wall (approximately 32m) between the green area and the Malahide Road. The new link will also provide a connection between the retail and residential areas, as shown in the relevant extract from EIAR Volume 3 Chapter 4 Proposed Scheme Description Figures, General Arrangement drawings in Figure 2.1.6 below.

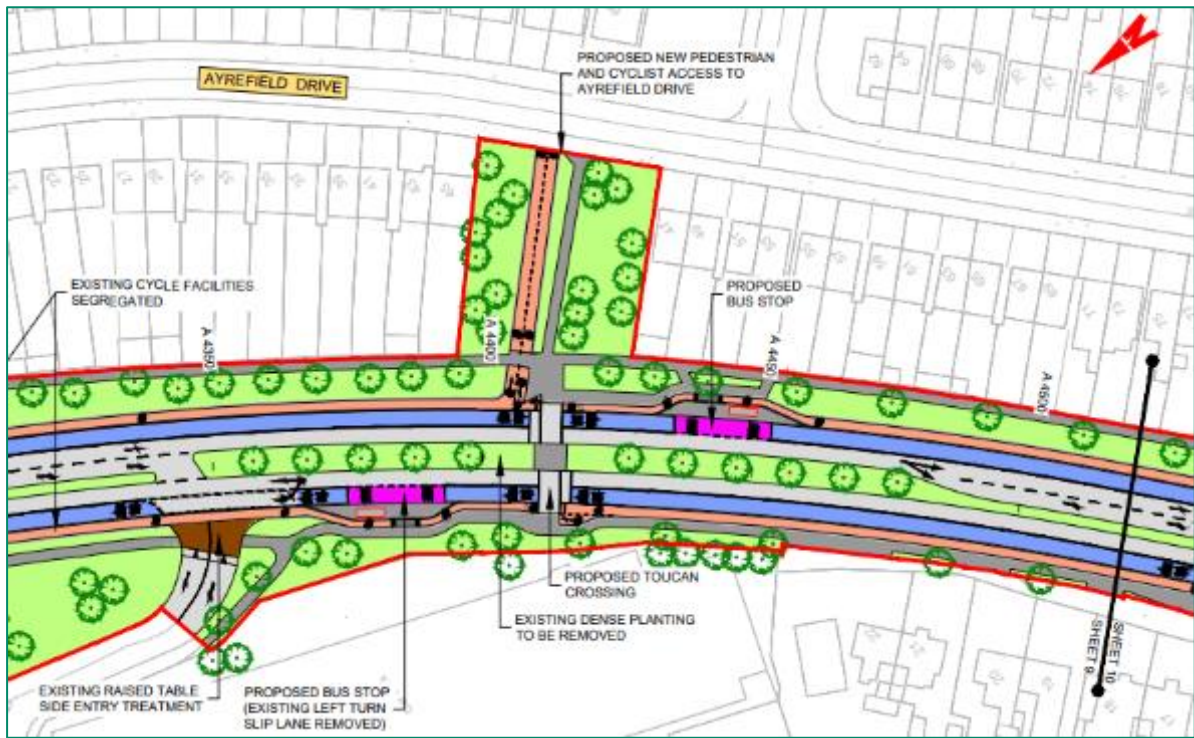


Figure 2.1.6: Proposed new Pedestrian and Cyclist Link at Ayrefield Drive

The visualisation of the removal of the boundary wall between the green area and the Malahide Road, as shown in Image 4.2 of EIAR Chapter 4 Proposed Scheme Description, see Figure 2.1.7 below.



Figure 2.1.7: Image 4.2 in EIAR Chapter 4: Malahide Road cycle track and footpath improvements at Ayrefield Drive crossing – looking south

2.1.3 Overview of Submissions Received

Table 2.1.1 below lists the 64 individual submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road.

Table 2.1.1: Submissions Made in Respect of Ayrfield Drive

No	Name	No	Name	No	Name
4	Garett and Rena Carey	33	Joe Thompson	62	Alan and Susan O'Brien
9	Martin Baker	34	Sorcha Eivers	63	Anthony Masterson
11	Cllr. Tom Brabazon	36	Leslie and Bernadette Doyle	66	Cian O'Callaghan TD
12	Mark and Shirley Rose	37	Martin Lewis	67	Cllr. Tom Brabazon (duplicate of 11)
13	Elizabeth Keegan	38	Ruth Moloney	69	Deborah Byrne
14	Aodhan O'Riordain TD	39	Alison Corrigan	70	Denise Mitchell TD (and others)
16	Michael Healy	40	Brendan Rice	77	Linda and Christopher Hamilton
17	Gareth Young	41	Chiara Hughes (and Alan Byrne)	78	Margaret Quinn
18	Mark Byrne	42	Cllr. Daryl Baron	80	Patrick Carey (and others)
19	Kerri McCracken	44	Edel Carroll	82	Sean Haughey TD
20	Eamonn Tierney	45	Eoin Lynam	85	Peg Connolly
21	Mandy and Tony Donnelly	47	Gemma and Brendan Finn	86	Dan and Marie Carolan
22	Paula and Declan Free	49	Jennifer McLaughlin	87	James Kelly (and others)
23	Dermot and Linda Kavanagh	50	John Fannin	88	Ian and Louise O'Shaughnessy (and others)
25	Kieran and Brenda Mahon	51	Ken Lynam	89	Patrick Gaffney (and others)
26	Roisin Harbourne	52	Liene Atrena (and Konstantinos Pachoulas)	90	Freddie Poole
27	Eamonn Kearney	53	Maria Kavanagh	91	Robert Byrne
28	Adrienne Murphy	54	Niall Maher	92	Bernie Grant
29	Martina Devlin	55	Paul Foley	93	Anita Cullen
30	Bridie and Joe Corcoran	57	Veronica and Patrick Byrne	94	Elizabeth D'Arcy
31	Raymond and Ursula Butler	58	Eamonn McGlinn		
32	Lorraine and Paul Carroll	60	Adrian and Ann Byrne		

All of the 64 submissions made to the Board in relation to the Proposed Scheme at this location opposed the proposal to open the green space to the Malahide Road for the purposes of providing a new proposed pedestrian footpath and cycle track between Ayrfield Drive and the Malahide Road.

The existing green area through which the link is proposed is currently privately owned, hence it has been included in the CPO (plot no 1003(1).1f), see Figure 2.1.8 below. No submission to the Proposed Scheme or the CPO was received from the reputed owner of the land in question.

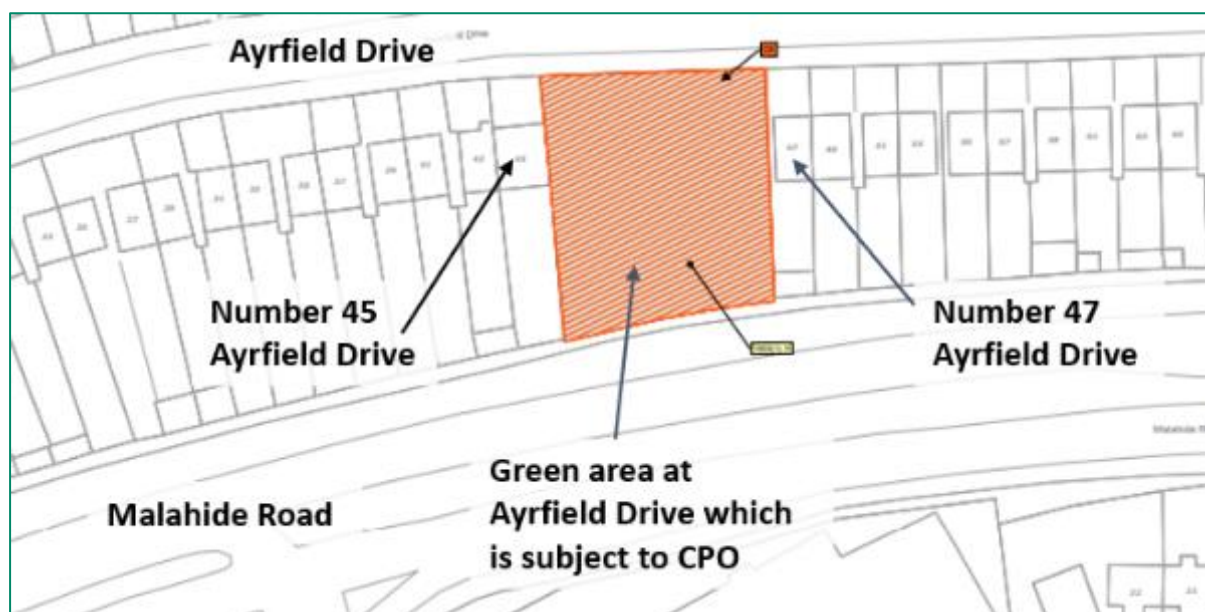


Figure 2.1.8: Extract from CPO Schedule Part 1 – Lands Being Permanently Acquired

Of the 64 submissions, 58 were from residents of the Ayrfield estate and 6 were from elected representatives supporting the residents. It is noted that submission 17 included a petition, which is stated to include signatures from 619 households but it is noted that the submission relates to 544 property addresses.

While none of the submissions objected to the overall scheme, the principal contention made in the submissions was that the proposed new link was not necessary, had not been appropriately investigated and the residents had not been consulted. A number of additional issues were also raised, many of which were common to many of the 64 submissions.

These common views / issues are listed below and described in Section 2.1.4 below.

- i. Need for new link not investigated adequately;
- ii. Querying the consultation process;
- iii. Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- iv. Loss of Green / Community Space;
- v. Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor; and
- vi. Increased air and/or noise pollution.

A small number of submissions raised some more specific issues which related to individual properties in the immediate vicinity of the green area, raised by residents of numbers 45, 47 and 60 Ayrfield Drive.

These are listed below and described in Section 2.1.5 below.

- vii. Visual impact / loss of privacy; and
- viii. Loss of property value.

2.1.4 Common Issues Raised

i. Need for new link not adequately investigated

Summary of Issue Raised

All of the submissions stated that the residents of Ayrfield Drive did not want the new link, with some stating their objection to the associated CPO. The submissions questioned why it was being proposed and also expressed the view that there had been inadequate investigation of the proposal.

Some submissions stated the opinion that omitting the link would have no adverse impact on the Proposed Scheme as a whole and no adverse impact on the effectiveness of the scheme.

Other submissions expressed the view that the existing accesses to Tonlague Road and Blunden Drive were sufficient and stated that any perceived inconvenience of not having the proposed link was outweighed by other issues. Some submissions commented that the existing layout of the estate remains an appropriate arrangement.

Response to issue raised

This response addresses the contention that the new link is not necessary and was not investigated adequately.

Existing data

Section 10.2.1.1 of the EIAR Volume 2 Chapter 10 Population, includes the assessment of impacts on community amenity, land take and accessibility consisting of 'community areas', which are informed by the Central Statistics Office (CSO) 2016 Census parish boundaries (CSO 2016a). One of these community areas is Ayrfield.

Section 10.3.2.3 of EIAR Chapter 10 provides data on the method of travel to work for each of these community areas and the results are presented in Table 10.5 of that section, which is shown in Figure 2.1.5 above.

As can be seen from Figure 2.1.5, of the 11 Community Areas assessed, Ayrfield has the highest car mode share for travel to work trips at 62%. In addition, this mode share exceeds the average mode share for County Dublin as a whole. This is also highlighted in section 11.3.4 of EIAR Chapter 11 Human Health. Reference to the data for other community areas in Table 10.5 located along the Malahide Road corridor, such as Darndale, Coolock and Donnycarney, highlights that they have lower travel by car percentage and higher travel by bus percentage, compared to Ayrfield. These other areas generally have comparatively better permeability to the high frequency bus services along the Malahide Road when compared to Ayrfield. This data suggests that the prevalence of private car journeys within Ayrfield may be linked to poorer access to public transport/ walking & cycling facilities.

Policy

The application documentation submitted to An Bord Pleanála demonstrates that the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the new bus stops on the Malahide Road is consistent with, and supports elements of, international policy, European Union (EU) law and policy, national policy, regional policy and local policy.

At all policy levels, there are clear objectives to increase active travel and accessibility to public transport. In response to the submissions in relation to the creation of a new pedestrian and cycling link between Ayrfield Drive and the Malahide Road, the details of how the proposed new link supports these different tiers of policy are provided in the paragraphs below.

International Policy, EU Law & Policy

As set out in Sections 2.3.1 and 2.3.2 of the EIAR Volume 2 Chapter 2 Need for the Scheme, and Appendix A2.1 Planning Report, the Proposed Scheme supports several international policies. In relation to the new link between Ayrfield Drive and the Malahide Road, it supports particular aspects of the policies as described in Table 2.1.2 below:

Table 2.1.2: International Policy, European Union Law & Policy referenced in EIAR Chapter 2 supported by the Proposed Link

International Policy, EU Law & Policy	How the proposed link between Ayrfield Drive and Malahide Road supports the policies identified in EIAR Chapter 2
United Nations 2030 Agenda	<p>Section 2.3.1.1 of the EIAR Volume 2 Chapter 2 describes how the 2030 Agenda aims to deliver a more sustainable, prosperous, and peaceful future for the entire world, and sets out a framework for how to achieve this by 2030. This framework is made up of 17 Sustainable Development Goals (SDGs) which cover the social, economic, and environmental requirements for a sustainable future. Section 2.3.1.1. notes that SDGs 9 and 11 are relevant to the Proposed Scheme as follows:</p> <p>Goal 9: Build resilient infrastructure, promote inclusion and sustainable industrialization and foster innovation;</p> <p>Target 9.1: Develop quality, reliable, sustainable, and resilient infrastructure, including regional and trans-border infrastructure, to support economic development and human wellbeing, with a focus on affordable and equitable access for all</p> <p>Goal 11: Make cities and human settlements inclusive, safe, resilient, and sustainable</p> <p>Target 11.2 By 2030, provide access to safe, affordable, accessible, and sustainable transport systems for all, improving road safety, notably by expanding public transport, with special attention to the needs of those in vulnerable situations, women, children, persons with disabilities and older persons.</p> <p>Section 2.3.1.1 of the EIAR Volume 2 Chapter 2 assesses that ‘the need for the Proposed Scheme is supported by the goals and targets set out in the relevant SDGs. It will provide for enhanced walking, cycling and bus infrastructure, which will subsequently enable more efficient, safe and integrated sustainable transport movement along this corridor.’</p> <p>As part of the Proposed Scheme, the proposed link from Ayrfield Drive will provide for enhanced walking and cycling infrastructure from the Ayrfield estate which will enable improved accessibility to sustainable transport and will reduce the distances to sustainable public transport for those in vulnerable situations, women, children, persons with disabilities and older persons.</p>
Sustainable and Smart Mobility Strategy 2020 (EU Commission 2020)	<p>Section 2.3.2.1 of the EIAR Volume 2 Chapter 2 describes how this EU strategy sets out a number of goals as to how people will move within and between cities in the future and explains how the strategy has identified 82 initiatives which have been categorised into 10 ‘flagships.’</p> <p>The flagship relevant to the Proposed Scheme is ‘Flagship 3 – Making interurban and urban mobility more sustainable and healthy’. This flagship states that: ‘increasing the modal shares of collective transport, walking and cycling, as well as automated, connected and multimodal mobility will significantly lower pollution and congestion from transport, especially in cities and improve the health and well-being of people. Cities are and should therefore remain at the forefront of the transition towards greater sustainability.’</p> <p>Section 2.3.2.1 of the EIAR Volume 2 Chapter 2 assesses that ‘the need for the Proposed Scheme is supported by the objectives of the EU’s Sustainable and Smart Mobility Strategy through significant investment in cycle and pedestrian infrastructure, in addition to bus priority, along the route of the Proposed Scheme, thereby supporting and encouraging growth in active travel and sustainable public transport usage.’</p> <p>The proposed link from Ayrfield Drive will support and encourage growth in active travel and sustainable public transport usage.</p>

International Policy, EU Law & Policy	How the proposed link between Ayrfield Drive and Malahide Road supports the policies identified in EIAR Chapter 2
European Green Deal (EDG) 2019	<p>Section 2.3.2.2 of the EIAR Volume 2 Chapter 2 describes how the EDG indicated the European Commission adopted a communication entitled ‘Sustainable and Smart Mobility Strategy – putting European transport on track for the future’.</p> <p>Section 2.3.2.2 of the EIAR Volume 2 Chapter 2 states that ‘This Strategy has the objective of ‘accelerating the shift to sustainable and smart mobility’ and requires that, ‘[t]he EU transport system and infrastructure will be made fit to support new sustainable mobility services that can reduce congestion and pollution, especially in urban areas’. It is noted that pollution is concentrated the most in cities and that a combination of measures is needed which includes ‘improving public transport and promoting active modes of transport such as walking and cycling.’ The Proposed Scheme is necessary, in conjunction with a range of other initiatives, to attain the objectives of the European Green Deal, through significant investment in cycle and pedestrian infrastructure, in addition to bus priority, thereby supporting and encouraging growth in active travel and sustainable public transport usage’.</p> <p>The proposed link from Ayrfield Drive will support and encourage growth in active travel and sustainable public transport usage.</p>

National Policy

As set out in Section 2.3.3 of the EIAR Volume 2 Chapter 2, and Appendix A2.1 Planning Report, the Proposed Scheme supports several objectives of national policy. The specific element of the Proposed Scheme about which the submissions have been made to the Board, the new link between Ayrfield Drive and the Malahide Road, supports particular aspects of the policies as described in Table 2.1.3 below:

Table 2.1.3: National Policies referenced in EIAR Chapter 2 supported by the Proposed Link.

National Policy	How the proposed link between Ayrfield Drive and Malahide Road supports the policies identified in EIAR Chapter 2
<p>Project Ireland 2040 – National Planning Framework (NPF) & National Development Plan (NDP) 2021-2030</p>	<p>Table 2.3 of Section 2.3.3.4 of the EIAR Volume 2 Chapter 2 describes how the Proposed Scheme meets various National Strategic Outcomes (NSOs) of the NPF.</p> <p>Relevant NSOs in respect of the proposed new link to Ayrfield Drive include the following:</p> <p>NSO1 Compact Growth – EIAR Chapter 2 Table 2.3 assesses that ‘The Proposed Scheme will support the creation of an attractive, resilient, equitable public transport network better connecting communities and improving access to work, education and social activity’. Table 2.3 also states that ‘The Proposed Scheme will bring greater accessibility to the City Centre and better connect communities and locations along its route for people to avail of housing, jobs, amenities and services.’</p> <p>The new direct link from Ayrfield Drive to the CBC along the Malahide Road will improve the accessibility to the City Centre, and better connect communities and locations along its route, for the Ayrfield residential area.</p> <p>NSO4 Sustainable Mobility - EIAR Chapter 2 Table 2.3 assesses that ‘The Proposed Scheme will provide infrastructure to support a sustainable transport network that will facilitate a modal shift from private car usage to sustainable transport. It will reduce journey times and increase journey time reliability and increase the attractiveness of active travel and public transport for travel, which will in turn facilitate sustainable transport option alternatives to private car usage. The Proposed Scheme will support integrated sustainable transport usage through infrastructure improvements for active travel (both walking and cycling), and the provision of enhanced bus priority measures for existing (both public and private) and all future services who will use the corridor.’</p> <p>Table 10.5 of EIAR Chapter 10 Population shows that of the 11 Community Areas assessed along the scheme corridor Ayrfield has the highest car mode share for travel to work trips at 62%, compared to the average for the study area of 49%. It is also above the average value for County Dublin which is 54%. The proposed link to the Ayrfield estate will help facilitate a modal shift from car usage to sustainable transport (active travel and public transport).</p> <p>NSO8 Transition to a Low Carbon and Climate Resilient Society - EIAR Chapter 2 Table 2.3 assesses that ‘The Proposed Scheme comprises transport infrastructure that supports the delivery of an efficient, low carbon and climate resilient public transport service. Furthermore, the Proposed Scheme will provide the advantage of segregated cycling facilities. These high quality cycle tracks will be typically 2m in width offering a high level of service and help to reduce dependency on private car use for short journeys in compliance with the objectives of NSO8. The primary objective of the Proposed Scheme therefore, through the provision of necessary bus, cycle, and walking infrastructure enhancements is the facilitation of modal shift from car dependency, and thereby contributing to an efficient, integrated transport system and a low carbon and climate resilient City in compliance with NSO8.’</p> <p>As well as providing a link for pedestrians to the new bus stops on the Malahide Road, the new cyclist link will connect the estate to the enhanced cycle tracks along the Malahide Road. This will help reduce dependency on private car use for short journeys, with an associated shift to active travel and public transport.</p> <p>NSO10 Access to Quality Childcare, Education and Health Services – EIAR Chapter 2 Table 2.3 assesses that ‘The Proposed Scheme provides infrastructure to support the delivery of sustainable transport that will benefit the entire community in terms of greater accessibility, capacity and speed of service improvements. The infrastructure improvements are along key arterial routes which include many of Dublin’s childcare, educational and health care services in compliance with the objectives of NS10.’</p> <p>The proposed link will improve the accessibility to the Malahide Road corridor and the community services located along it.</p>

National Policy	How the proposed link between Ayrfield Drive and Malahide Road supports the policies identified in EIAR Chapter 2
<p>Draft National Investment Framework for Transport in Ireland</p>	<p>Section 2.3.3.14 of the EIAR Volume 2 Chapter 2 states that 'The Department of Transport (DoT) is in the process of updating the existing transport framework, the National Investment Framework for Transport in Ireland (hereafter referred to as draft NIFTI) (DoT 2021c) to ensure alignment with the policies of the NPF.'</p> <p>On page 32 of Section 2.3.3.14 of Chapter 2 the EIAR notes that the draft plan states that future transport planning will prioritise sustainable modes and '<i>...sets out a hierarchy of travel modes to be accommodated and encouraged when investments and other interventions are made. Sustainable modes, starting with active travel and then public transport, will be encouraged over less sustainable modes such as the private car.</i>'</p> <p><i>'Active travel is the most sustainable mode of travel. Increasing the share of active travel can reduce the carbon footprint of the transport sector, improve air quality, reduce urban congestion, and bring about positive health impacts as a result of increased physical activity. The attractiveness of this mode is dependent on infrastructure — for example, dedicated footpaths, segregated cycle lanes and the quality and priority of road crossing points all impact upon the number of people engaging in active travel.'</i></p> <p>The proposed link and associated works support the above hierarchy of sustainable modes by encouraging active travel from the Ayrfield estate and the proposals are a good example of pieces of infrastructure (new pedestrian and cyclist link, aligned to a new signalised crossing of the Malahide Road, serving new bus stops) that support active travel and public transport.</p>
<p>Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009 - 2020</p>	<p>Section 2.3.3.5 of the EIAR Volume 2 Chapter 2 states that 'The Department of Transport, Tourism and Sport (DTTAS) Smarter Travel - A Sustainable Transport Future: A New Transport Policy for Ireland 2009 – 2020 (hereafter referred to as Smarter Travel) (DTTAS 2009a) is the National planning policy document to deliver an integrated transport policy for Ireland as supported by Government. A SEA and Appropriate Assessment (AA) were carried out as part of Smarter Travel.'</p> <p>Table 2.4 on page 26 of Section 2.3.3.5 of Chapter 2 of the EIAR describes how the Proposed Scheme meets the 5 Key Goals of Smarter Travel. Relevant Key Goals in respect of the proposed new link to Ayrfield Drive include the following:</p> <p>Improve quality of life and accessibility to transport for all and, in particular, for people with reduced mobility and those who may experience isolation due to lack of transport'</p> <p>The proposed link from Ayrfield Drive connecting to the new bus will make the bus transit experience more accessible for users of all abilities and ages. Provision and enhancement of cycling facilities along the Proposed Scheme, creating routes that are safe, accessible and attractive for people of all abilities and ages.</p> <p>Reduce overall travel demand and commuting distances travelled by the private car'</p> <p>The proposed link aligns with the goal as it will promote a viable modal shift from private car to a more sustainable forms of transport. It enhances active travel networks and thus encourages the use of these modes reducing reliance on the private car</p> <p>Improve security of energy supply by reducing dependency on imported fossil fuels'</p> <p>The proposed link aligns with the goal as it is providing the infrastructure necessary to facilitate a viable modal shift to sustainable transport.</p>

National Policy	How the proposed link between Ayrfield Drive and Malahide Road supports the policies identified in EIAR Chapter 2
Climate Action Plan 2021	<p>Section 2.3.3.9 of the EIAR Volume 2 Chapter 2 states that 'In regard to modal shift the Climate Action Plan 2021 sets out that:</p> <p>'The proposed pathway in transport is focused on accelerating the electrification of road transport, the use of biofuels, and a modal shift to transport modes with lower energy consumption (e.g. public and active transport).'</p> <p>Section 2.3.3.9 also describes how the Plan sets out various measures to 'Reduce Internal Combustion Engine (ICE) kilometres by c. 10% compared to present day levels.' The stated ICE reduction measures include 'Enhancing permeability for active travel'; and 'Delivering safer walking and cycling routes to encourage greater uptake of active transport'.</p> <p>The proposed link supports this by enhancing permeability, as well as connecting to high quality cycling routes along the CBC which will encourage greater uptake of active travel from the Ayrfield estate.</p> <p>Section 8.8.2 of EIAR Chapter 8 Climate states that 'The Proposed Scheme will also support the delivery of government strategies outlined in the CAP (DCCAIE 2019) and the 2021 Climate Act by enabling sustainable mobility and delivering a sustainable transport system. The Proposed Scheme will provide connectivity and integration with other public transport services leading to more people availing of public transport, helping to further reduce GHG emissions.'</p> <p>Section 8.8.2 goes on to state that 'it is concluded that the Proposed Scheme achieves the project objectives in supporting the delivery of an efficient, low carbon and climate resilient public transport service, which supports the achievement of Ireland's emission reduction targets. The Proposed Scheme has the potential to reduce CO₂e emissions equivalent to the removal of approximately 18,000 and 19,500 car trips per weekday from the road network in 2028 and 2043 respectively. This represents a significant contribution towards the national target of 500,000 additional trips by walking, cycling and public transport per day by 2030 as outlined as a target in the 2021 Climate Action Plan (CAP) (DCCAIE 2021).</p> <p>It is concluded that, the Proposed Scheme will make a significant contribution to reduction in carbon emissions.'</p> <p>The proposed link to Ayrfield Drive provides improved connectivity to the public transport system for the residential estate and has the potential to reduce CO₂ emissions through the removal of unnecessary car trips from the road network and contribute towards the national target 500,000 additional trips by walking, cycling and public transport per day by 2030.</p>

In addition to the national policies above referenced in the EIAR Chapter 2, since the application for the Proposed Scheme was made the Department of Transport published the National Sustainable Mobility Policy on 7th April 2022. By providing enhanced permeability for the Ayrfield estate, the proposal to provide a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road supports the following goals of the National Sustainable Mobility Policy.

Goal 3 - Expand availability of sustainable mobility in metropolitan areas

- *'Goal 3 aims to expand the capacity and availability of sustainable mobility in our five cities (Cork, Dublin, Galway, Limerick and Waterford). This will be done through improved walking, cycling, bus and rail infrastructure, improved transport interchange and expanded public transport services. Transformed active travel and bus infrastructure and services in all five cities is fundamental to achieving the targets of 500,000 additional daily active travel and public transport journeys and a 10% reduction in kilometres driven by fossil fuelled cars by 2030.'*

As listed in Table 2.1.3 above in relation to the Section 8.8.2 of EIAR Chapter 8 Climate, the proposed link to Ayrfield Drive provides improved connectivity to the public transport system for the residential estate and has the potential to reduce CO₂ emissions through the removal of car trips from the road

network and contribute towards the national target 500,000 additional trips by walking, cycling and public transport per day by 2030.

Goal 7 - Design infrastructure according to Universal Design Principles and the Hierarchy of Road Users model

- *‘Goal 7 “aims to support enhanced permeability and ensure that the universal design principle and Hierarchy of Road Users model is used to inform future investment decisions to reduce inequalities, support a whole of journey approach, and prioritise sustainable mobility’.*

The proposed link at Ayrfield Drive provides enhanced permeability to the residential area and as noted in Section 6.4.6.1.2.1 of EIAR Chapter 6 Traffic and Transport states that *‘All proposed facilities have been designed in accordance with the principles of DMURS and the National Disability Authority (NDA) ‘Building for Everyone: A Universal Design Approach’ (NDA 2020) with regards to catering for all users, including those with disabilities.’*

Regional Policy

As set out Section 2.3.4 of the EIAR Volume 2 Chapter 2, and Appendix A2.1 Planning Report, the Proposed Scheme supports several regional policies. The new link between Ayrfield Drive and the Malahide Road supports particular aspects of the policies as described in Table 2.1.4 below:

Table 2.1.4: Regional Policies referenced in EIAR Chapter 2 supported by the Proposed Link

Regional Policy	How the proposed link between Ayrfield Drive and Malahide Road supports the policies identified in EIAR Chapter 2
<p>Transport Strategy for the Greater Dublin Area (GDA) 2016 – 2035</p>	<p>Section 2.3.4.1 of the EIAR Volume 2 Chapter 2 and Section 3.6.2 of Appendix A2.1 describe how the need for the Proposed Scheme is supported by the GDA Transport Strategy. Section 3.6.2.1 of Appendix A2.1 assesses: <i>'The Proposed Scheme will provide the infrastructure necessary to deliver the transformational change of the current bus network required to meet objectives such as, greater efficiency, reduction in journey times and improve environmental performance. The Proposed Scheme design has been developed by NTA and takes account of policy objectives in the Implementation Plan.'</i></p> <p>The proposed link provides improved accessibility to the CBC along the Malahide Road, which is an important component of the significantly enhanced bus network in this area</p>
<p>Draft Greater Dublin Area Transport Strategy 2022 -2042</p>	<p>As set out in Table 2.8 in Section 2.3.4.3 of the EIAR Chapter 2, the draft GDA strategy includes various measures that the Proposed Scheme will support. In respect of the proposed link between Ayrfield Drive and the Malahide Road the following measures are directly relevant:</p> <p>Measure PLAN13 – Urban Design in Walking and Cycling Projects.</p> <p>The proposed link meets this measure increasing the permeability accessibility of the Ayrfield estate, thereby increasing accessibility to the core bus corridor and bus stops, as well as increasing accessibility for cyclists to the new cycletrack and for pedestrians via a new Toucan crossing on the Malahide Road.</p> <p>Measure PLAN16 – The Road User Hierarchy</p> <p>The proposed link aligns with this measure as it will help promote modal shift from private car to a more sustainable forms of transport. It enhances active travel networks and thus encourages the use of these modes reducing reliance on the private car.</p> <p>Measure INT1 – Integration of all Modes in Transport Scheme</p> <p>The proposed link aligns with this measure as it enhances the connection between the public transport network and the active travel network and thus encourages the use of these modes reducing reliance on the private car. Access to/from the residential area by car is unaffected by the Proposed Scheme.</p>

Regional Policy	How the proposed link between Ayrfield Drive and Malahide Road supports the policies identified in EIAR Chapter 2
<p>Regional Spatial Economic Strategy (RSES) for the Eastern and Midland Region (EMR) 2019 – 2031</p>	<p>As set out in Section 2.3.4.4 of the EIAR Chapter 2, the RSES for the ERM contains the Dublin Metropolitan Area Strategic Plan (Dublin MASP) which includes various Regional Policy Objectives (RPOs) that the Proposed Scheme will support.</p> <p>In respect of RPO 5.3 the proposed link between Ayrfield Drive and the Malahide Road is directly relevant as it will support the increase of active travel modes and public transport use:</p> <p>‘RPO 5.3: Future development in the Dublin Metropolitan Area shall be planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive street environment for pedestrians and cyclists.’</p>

In addition to the above, Section 7.1.2 of the GDA strategy, sets out several local planning principles, including:

‘New development areas should be fully permeable for walking and cycling and the retrospective implementation of walking and cycling facilities should be undertaken where practicable in existing neighbourhoods, in order to a give competitive advantage to these modes;’

The proposed new link between Ayrfield Drive and the Malahide Road is a good example of a retrospective piece of walking and cycling infrastructure which will increase permeability for walking and cycling and help to encourage active travel.

Local Policy

As set out in Section 2.3.5 of the EIAR Volume 2 Chapter 2, and Appendix A2.1 Planning Report, the Proposed Scheme supports several local policies. The new link between Ayrfield Drive and the Malahide Road supports particular aspects of the policies as described in Table 2.1.5 below:

Table 2.1.5: Local Policies referenced in EIAR Chapter 2 supported by the Proposed Link

Local Policy	How the proposed link between Ayrfield Drive and Malahide Road supports the policies identified in EIAR Chapter 2
<p>Dublin City Development Plan 2016 - 2022</p>	<p>As set out in Table 2.9 of Section 2.3.5.1 of the EIAR Chapter 2, the Dublin City Development Plan includes a number of policies and objectives that the Proposed Scheme supports. In respect of the proposed link between Ayrfield Drive and the Malahide Road the following are directly relevant:</p> <p><i>'MT3: To support and facilitate the development of an integrated public transport network with efficient interchange between transport mode, serving the existing and future needs of the city in association with relevant transport providers, agencies and stakeholders.'</i></p> <p>'The Proposed Scheme aligns with the objective as it will enhance the interchange between the various modes of public transport operating in the city and wider metropolitan area, both now and in the future. The design has been developed with this in mind and, in so far as possible, is seeking to provide for improved existing or new interchange opportunities with other transport services.'</p> <p>The proposed new link between Ayrfield Drive and the Malahide provides improved integration between active travel and public transport modes.</p> <p><i>'MT11: To continue to promote improved permeability for both cyclists and pedestrians in existing urban areas in line with the National Transport Authority's document 'Permeability – a best practice guide.'</i></p> <p>'The Proposed Scheme aligns with the objective as Chapter 6 (Traffic & Transport) of the EIAR has considered the permeability as part of the project.'</p> <p>The proposed new link provides improved permeability and is in accordance with the NTA's best practice guide referenced above.</p> <p><i>MT045: To implement best practice in road design as contained in statutory guidance and in the DMURS (the use of which is mandatory) with a focus on place-making and permeability (for example, by avoiding long walls alongside roads) in order to create street layouts that are suited to all users, including pedestrians and cyclists.</i></p> <p>The proposed new link provides improved permeability by creating an opening in the existing long boundary wall that separates the Ayrfield estate from the Malahide Road.</p>
<p>Draft Dublin City Development Plan 2022 – 2028</p>	<p>As set out in Section 2.3.5.3 of the EIAR Chapter 2, the draft Dublin City Development Plan includes a number of aspects that the Proposed Scheme supports. In respect of the proposed link between Ayrfield Drive and the Malahide Road Section 2.3.5.3 states <i>'The draft Plan sets out in Chapter 8 (Sustainable Movement and Transport) under the heading 'Introduction' that 'Sustainable and efficient movement of people and goods is crucial for the success and vitality of the city.' It continues 'The policy approach promotes the integration of land use and transportation, improved public transport and active travel infrastructure, an increased shift towards sustainable modes of travel and an increased focus on public realm and healthy placemaking, while tackling congestion and reducing transport related CO2 emissions.'</i></p> <p>The proposed new link provides improved accessed to public transport by providing new active travel infrastructure.</p>

In addition to the above, section 12.5.2 of the Dublin City Development Plan 2016 – 2022, includes the following policy: *SN4: To have regard to the Department of Housing, Planning, Community and Local Government’s Guidelines on Sustainable Residential Development in Urban Areas and its accompanying Urban Design Manual, 2010, the Guidelines on Local Area Plans and the related Manual, 2013 and the joint DTTS and DCLG’s Design Manual for Urban Streets and Roads (DMURS), 2013 and the NTA’s Permeability Best Practice Guide, 2015, in the making of sustainable neighbourhoods.’*

The NTA’s best practice guide referenced above specifically highlights that boundary walls around estates and within residential areas that prevent movement along natural desire lines can act as a barrier to permeability. The removal of a section of the boundary wall (approximately 32m) and the addition of the proposed new link between Ayrfield Drive and the Malahide Road provides improved permeability at this location in accordance with the best practice guide.

Scheme Objectives

The objectives of the Proposed Scheme, included in Section 1.1 of Volume of the EIAR the Non-Technical Summary, and also included in Section 2.1 of Volume 2 Chapter 2 Need for the Proposed Scheme, support the various policies outlined above. Specifically, the proposal for a new link between Ayrfield Drive, together with the new bus stops on the Malahide Road, supports the following stated objectives of the Proposed Scheme as highlighted, and described in detail, below:

- *Support the delivery of an efficient, low carbon and climate resilient public transport service, which supports the achievement of Ireland’s emission reduction targets; - **The new link between Ayrfield Drive and the Malahide Road facilitates a mode-shift from car-dependence;***
- *Enhance the capacity and potential of the public transport system by improving bus speeds, reliability and punctuality through the provision of bus lanes and other measures to provide priority to bus movements over general traffic movements; - **The proposal to locate a new Bus Stop at this location in combination with creating the new link to Ayrfield Estate will enhance the opportunity for users to access the high-frequency and reliable bus services through the provision of bus lanes and other measures;***
- *Enhance the potential for cycling by providing safe infrastructure for cycling, segregated from general traffic wherever practicable; - **the proposed new link will enhance the potential for cyclists from the Ayrfield estate to access safe segregated cycling infrastructure on Malahide Road;***
- *Improve accessibility to jobs, education and other social and economic opportunities through the provision of improved sustainable connectivity and integration with other public transport services; - **the proposed new link will provide improved sustainable connectivity improving accessibility***

Section 10.4.4.1.2.2 of the EIAR Chapter 10 Population, describes the impact of the Proposed Scheme on accessibility, and concludes that *‘The community areas that are expected to experience a Positive, Moderate to Significant and Long-Term impact on pedestrians, a Positive, Significant and Long-Term impact on cyclists and a Positive, Moderate to Very Significant and Long-Term impact on bus users as a result of changes to access, are Darndale, **Ayrfield**, Coolock, Artane, Donnycarney and Marino.’*

EIAR Chapter 2 Appendix A10.2, The Economic Impact of the Core Bus Corridors, sets out the manner in which the Proposed Scheme will bring positive impacts for businesses and individuals along the corridor, including encouraging more sustainable travel through increased bus patronage, walking and cycling. This is summarised on page 6 of the Executive Summary of the Appendix where it is highlighted that the improved infrastructure will encourage more walking and cycling, as road safety fears are often the main reason people do not cycle, and the new bus routes will provide improved access for all families, with those on low income or with disabilities, in particular, gaining through improved transport options and less need to spend on car travel. The positive impacts of the Proposed Scheme are further evidenced in Section 4 Community Health and Wellbeing, where the following conclusion is stated: *‘Walking and cycling infrastructure developed as part of the proposed improvements should lead to an increase in the use of sustainable transport modes by offering new and safer alternatives to the use of private vehicles. These impacts will occur as soon as the new facilities are opened and the evidence suggests that people should rapidly swap to new transport choices.’* The proposed link from Ayrfield Drive is an important piece of infrastructure that will support more sustainable travel at this location on the corridor.

Section 10.4.4.1.2.2. of EIAR Chapter 10 Population also assesses that ‘The significant improvement to the walking, cycling and bus facilities included within the Proposed Scheme will encourage sustainable modes of transport, therefore reducing the demand for private vehicles / parking along the Proposed Scheme. Improved accessibility is also expected to increase social cohesion within the local community as discussed further in Appendix A10.2 in Volume 4 of this EIAR (EY 2021).’ The new link to Ayrfield Drive will allow the community to be better linked to the wider public transport, cycle network and walking routed in the area.

The application documentation provided to An Bord Pleanála establishes that the proposal for a new pedestrian and cyclist link between Ayrfield Drive and Malahide Road, connecting to the new bus stops and the toucan crossing on the Malahide Road, is needed to provide improved permeability and accessibility to encourage increased active travel and public transport patronage at this location.

Table 6.11 of the EIAR Chapter 6 Traffic and Transport sets out the rationale for the new bus stop on Malahide Road at this location, Chainage A4450 as follows:

‘New stop located approximately 105m south of the Malahide Road Retail Centre access. Stop proposed to serve *the surrounding residential catchment and located adjacent to a new signalised crossing.*’

Specifically, the following information is highlighted:

Existing Access to Sustainable Travel

As shown in Figure 2.1.9 and Figure 2.1.10 below, Image 2.4 from EIAR Chapter 2 Need for the Proposed Scheme provides an overview of the existing combined activity density scenario along the length of the of the Proposed Scheme. This identifies the Ayrfield Drive catchment as a medium density location based on the 2011 census data. Image 2.5 of the same Chapter displays the Dublin Bus Patronage heat map along the length of the Proposed Scheme which also highlights a significant reduction in Bus Patronage on the Malahide Road in the vicinity of Ayrfield Drive relative to the other sections of the Proposed Scheme.

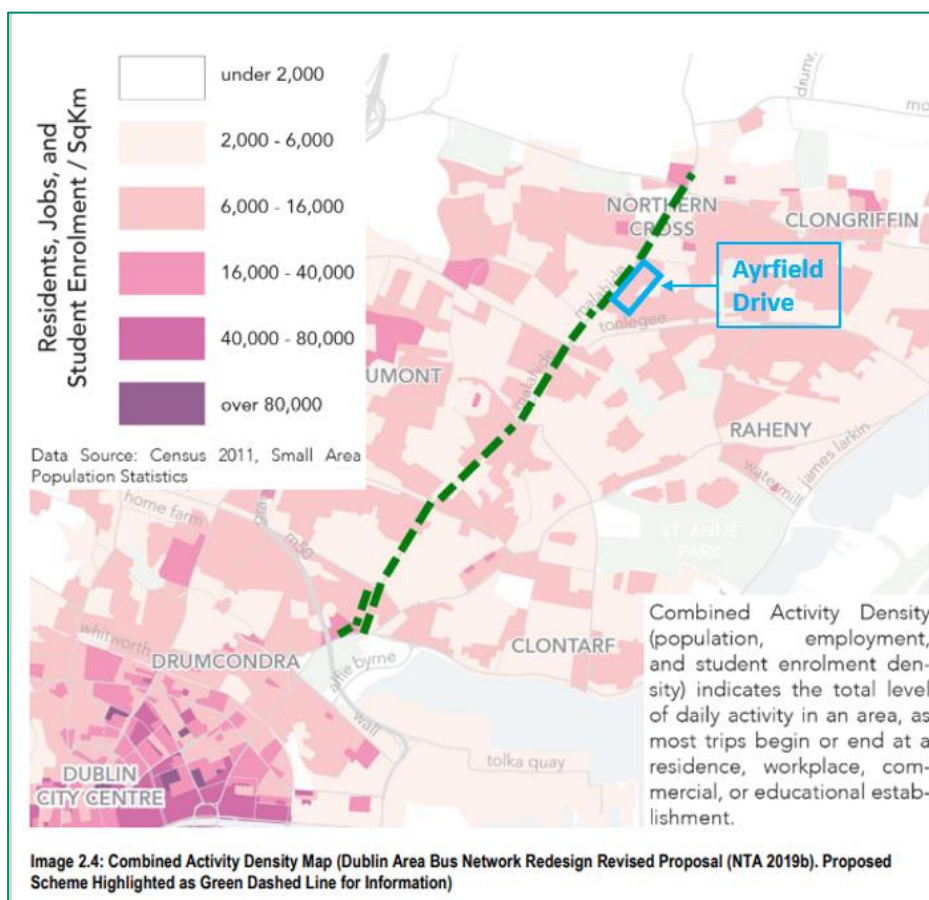


Figure 2.1.9: Images 2.4 of EIAR Chapter 2

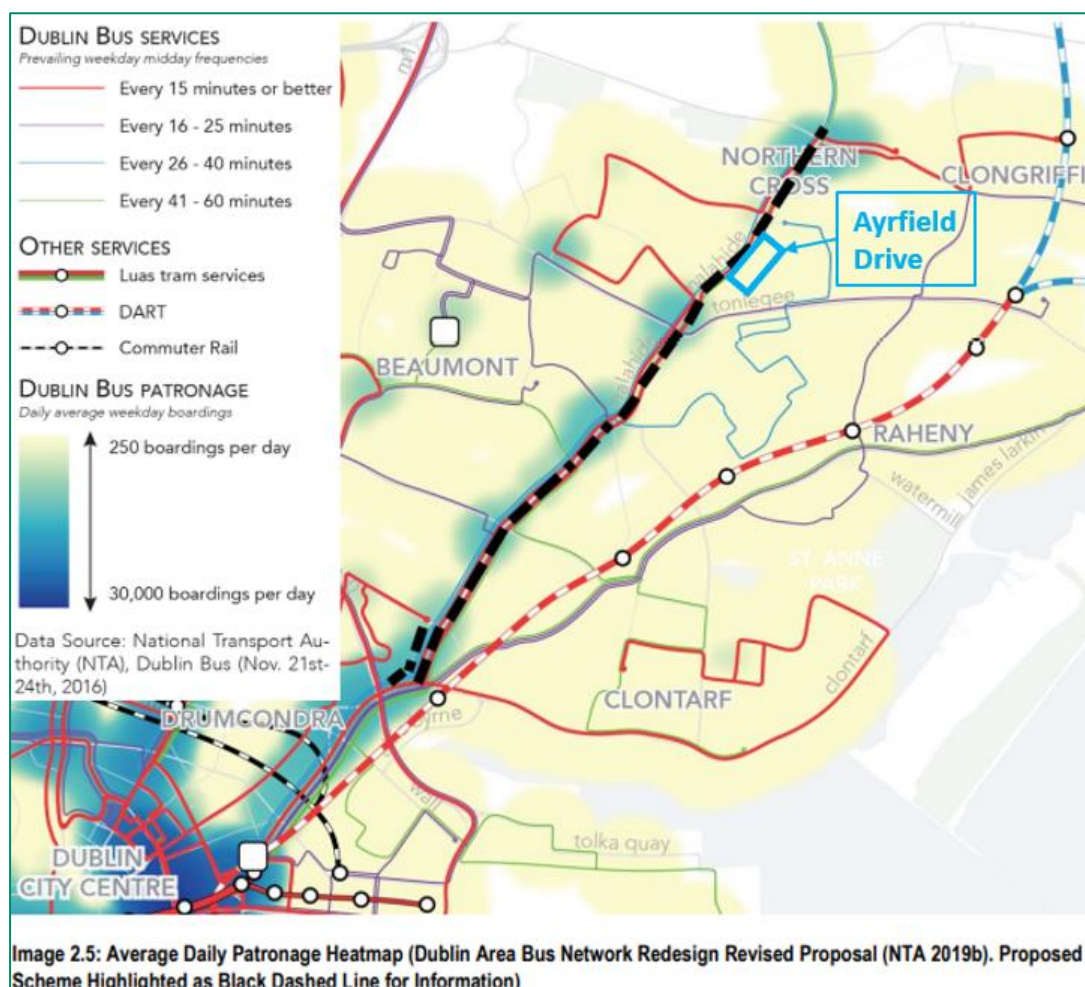


Figure 2.1.10: Images 2.5 of EIAR Chapter 2

This is further supported by Section 10.2.1.1 of the EIAR Volume 2 Chapter 10 Population, includes the assessment of impacts on community amenity, land take and accessibility consist of 'community areas', which are informed by the Central Statistics Office (CSO) 2016 Census parish boundaries (CSO 2016a). One of these community areas is Ayrfield.

Section 10.3.2.3 of EIAR Chapter 10 provides data on the method of travel to work for each of these community areas and the results are presented in Table 10.5 of that section, which is shown in Figure 2.1.5 above.

As can be seen from Figure 2.1.5, of the 11 Community Areas assessed Ayrfield has the highest car mode share for travel to work trips at 62%. In addition, this mode share exceeds the average mode share for County Dublin as a whole. Other community areas in Table 10.5 located along the Malahide Road corridor, such as Darndale, Coolock and Donnycarney, have lower travel by car percentage and higher travel by bus percentage, compared to Ayrfield. These other areas generally have good permeability to the high frequency bus services along the Malahide Road.

In comparison, as shown in Figure 2.1.11 below, the Ayrfield estate is enclosed by a continuous boundary wall between the properties in the estate and the Malahide Road. This prevents any direct access/egress other than at the existing points on Blunden Drive and Tonlegee Road and acts as a deterrent to achieving the required mode-shift away from private car use or residents in the estate.



Figure 2.1.11: Location of Ayrfield Drive and Proposed new Pedestrian / Cyclist Link (Image Source: Google)

Accessibility and permeability

Section 6.4.6.1.2.1 of EIAR Chapter 6, dealing with pedestrian infrastructure, confirms that all proposed facilities have been designed in accordance with the principles of DMURS and the National Disability Authority (NDA) ‘Building for Everyone: A Universal Design Approach’ (NDA 2020) with regards to catering for all users, including those with disabilities.

As set out in Table 2.9 of Section 2.3.5.1 of the EIAR Chapter 2, the Dublin City Development Plan includes Policy ‘MT11: To continue to promote improved permeability for both cyclists and pedestrians in existing urban areas in line with the National Transport Authority’s document ‘Permeability – a best practice guide.’ This NTA document sets out how gaps in the transport networks can be addressed by measures which facilitate and promote walking, cycling and public transport. In the introduction to the policy guidance on page 1 it states that ‘In many cases, these “gaps” comprise situations where demand for walking and cycling in towns and cities is not being met by the transport network.’ Locations where severance is “built-in” to the environment by high walls are cited as one of the common examples. The NTA encourages the transformation of such neighbourhoods into permeable ones, where people can walk or cycle through areas safely and conveniently, and in a manner which confers a competitive advantage to these modes over motorised forms, particularly the private car. This approach is directly applicable to the existing situation at Ayrfield Drive, demonstrating that the proposed new link follows the approach set out in the best practice guidance promoted by the NTA and the Dublin City Development Plan.

Section 10.4.4.1.1 of Chapter 10 Population of Volume 2 of the EIAR, considers community accessibility, which relates to the ability of users to access community facilities, recreational resources and residential properties. In Section 10.4.4.1.2.2 Ayrfield is referenced as one of the community areas that are expected to experience a Positive, Moderate to Significant and Long-Term impact on pedestrians, a Positive, Significant and Long-Term impact on cyclists and a Positive, Moderate to Very Significant and Long-Term impact on bus users as a result of changes to access. In respect of the

Ayrfield area this change in accessibility is directly associated with the provision of the new link, signalised crossing and new bus stops.

As part of the development of the design of the Proposed Scheme a bus stop review was undertaken and this included a catchment analysis using the NTA Geographical Information System (GIS) data, enhanced by adding footpaths, greenways and cut throughs / paths over greens or parks. The Network Analyst Extension in ArcGIS software was then used to generate 400m and 800m walking bands to reflect 5 and 10-minute walking catchments of bus stops. Further detailed analysis of the existing bus catchment analysis for the Proposed Scheme is included in the Preliminary Design Report Appendix H (Bus Stop Review), included in the Supplementary Information, which shows the existing 400m and 800m catchment areas based on the current Malahide Road bus stop arrangement, see Figure 2.1.12.

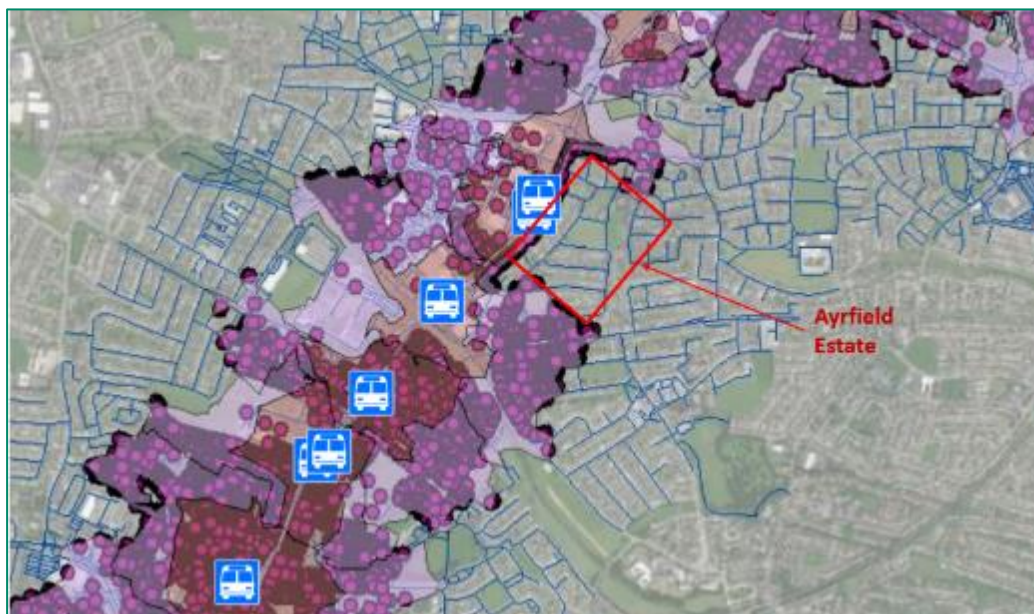


Figure 2.1.12: PDR Appendix H – Catchment Areas for existing Bus Stops

As can be seen from Figure 2.1.13 the majority of the Ayrfield estate highlighted is outside the existing walking catchments for the bus tops on the Malahide Road.

Access to Sustainable Travel with the Proposed Scheme

As described in paragraph 4.5.1.1 of Chapter 4 of the EIAR, the new pedestrian footpath and cycle track link between Ayrfield Drive and the Malahide Road included in the Proposed Scheme will provide a much shorter route for the residents of the Ayrfield Drive estate to gain access to the Clongriffin Core Bus Corridor and will enhance access to sustainable travel.

The catchment analysis described above, using the enhanced NTA Navteq data in ArcGIS, has also been used to generate 400m and 800m walking catchments of the bus stops for the Proposed Scheme. This analysis has identified the number of residential premises that will be within 400m and 800m of the bus stops on the Proposed Scheme and the results are presented in Figure 2.1.13 below.

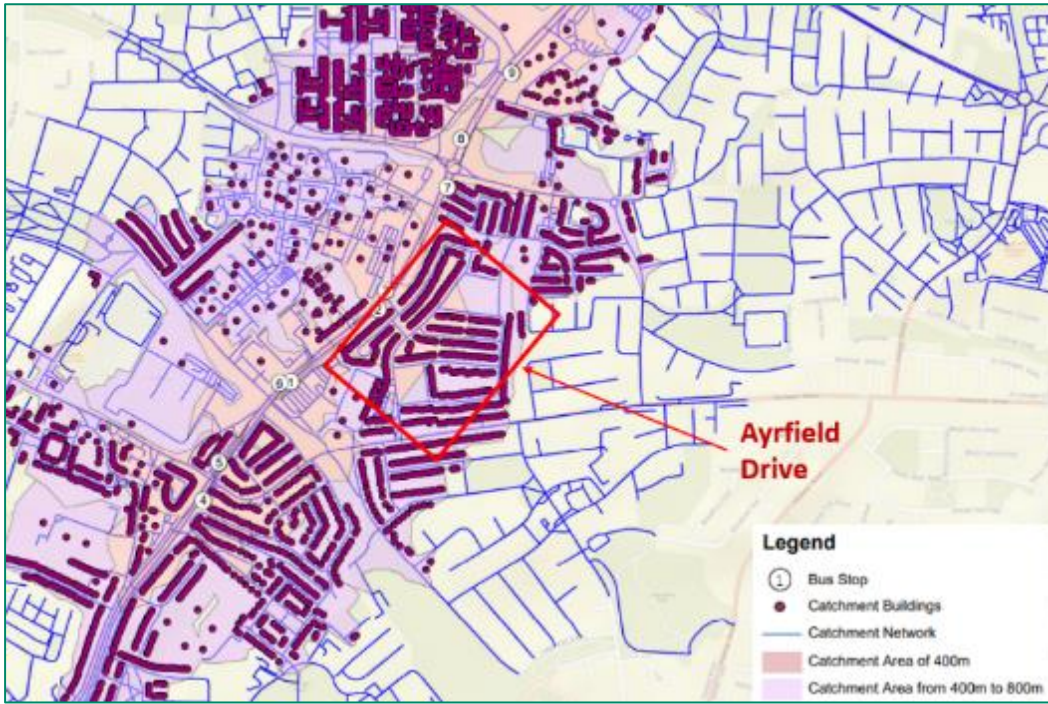


Figure 2.1.13: Catchment Areas for Bus Stops in the Proposed Scheme

The above walking catchment analysis was also re-run with the new pedestrian link to Ayrfield Drive omitted and the number of residential premises that would then be within 400m and 800m of a bus stop are presented in Figure 2.1.14 below.

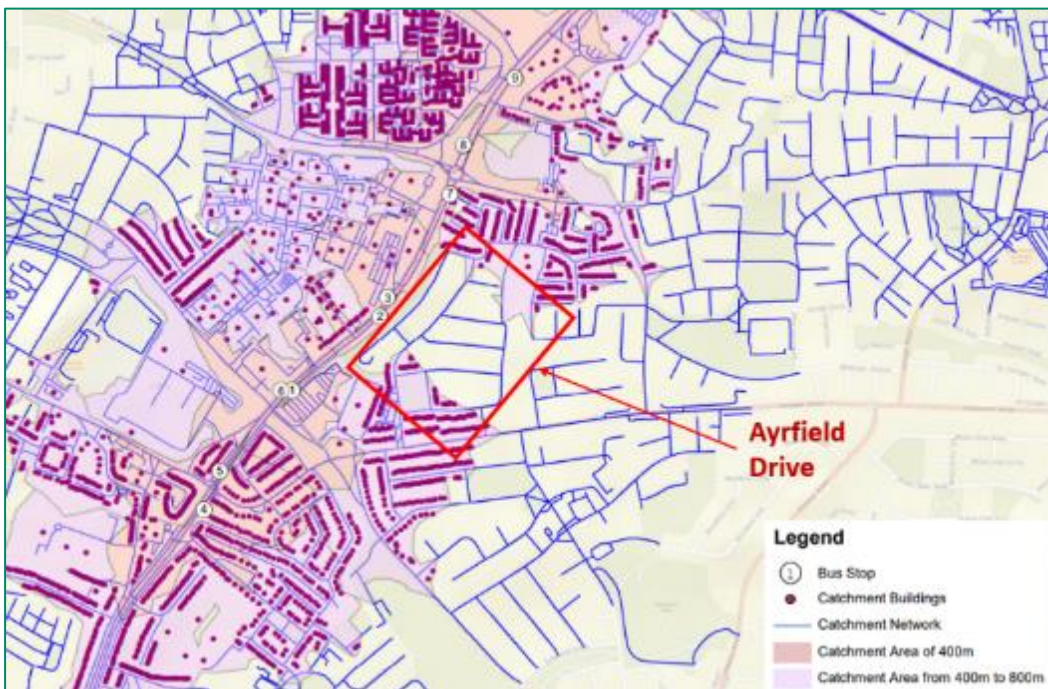


Figure 2.1.14: Catchment Areas for Bus Stops in the Proposed Scheme with link omitted

Table 2.1.6 below presents the reduction in the number of residential properties in the bus stop catchments areas in the vicinity of the Ayrfield estate associated if the new link were omitted.

Table 2.1.6: Proposed Scheme - Bus Stop Catchment Areas

Scenario	Residential Properties in Proposed Scheme Bus Stop Catchments		
	0-400m Catchment	400-800m Catchment	Total
Proposed Scheme	225	394	619
Proposed Scheme with new link omitted	22	13	35
Reduction if link omitted	-203	-381	-584

It is noted that some submissions express the view that the existing pedestrian links to Blunden Drive, via St Paul’s Church, and to Tonlegee Road at the southern end of Ayrfield Drive provide adequate routes to bus services on those roads.

In this regard it is important to consider the future bus services network within which the Proposed Scheme will be located. Figure 2.1.15 below provides an extract from the BusConnects Proposed Bus Services Network in this area.



Figure 2.1.15: Extract from Future Bus Services Network

The above figure shows that service D5 is proposed to commence at the existing bus stops on Blunden Drive at St Paul’s Church. This replicates the existing 27A service, see Figure 2.1.16 below, which follows a circuitous route serving the residential areas along Millbrook Road, Tonlegee Road, Springdale Road, Harmonstown Road and McAuley Road before joining the Proposed Scheme at the Gracefield Road / Ardlea Road junction.

While parts of the northern and eastern sections of the Ayrfield estate are within the catchment of the D5 route which gives residents a choice of service, and also offers a good service for the residents of the various estates through which it passes, from reference to Figure 2.1.16 the overall existing bus patronage of the area is relatively low. The proposed new pedestrian link to the Malahide Road provides residents of the Ayrfield estate wishing to travel towards the city centre, or towards Clongriffin, with improved accessibility to the higher frequency and more direct D1 and D3 services along the Proposed Scheme.

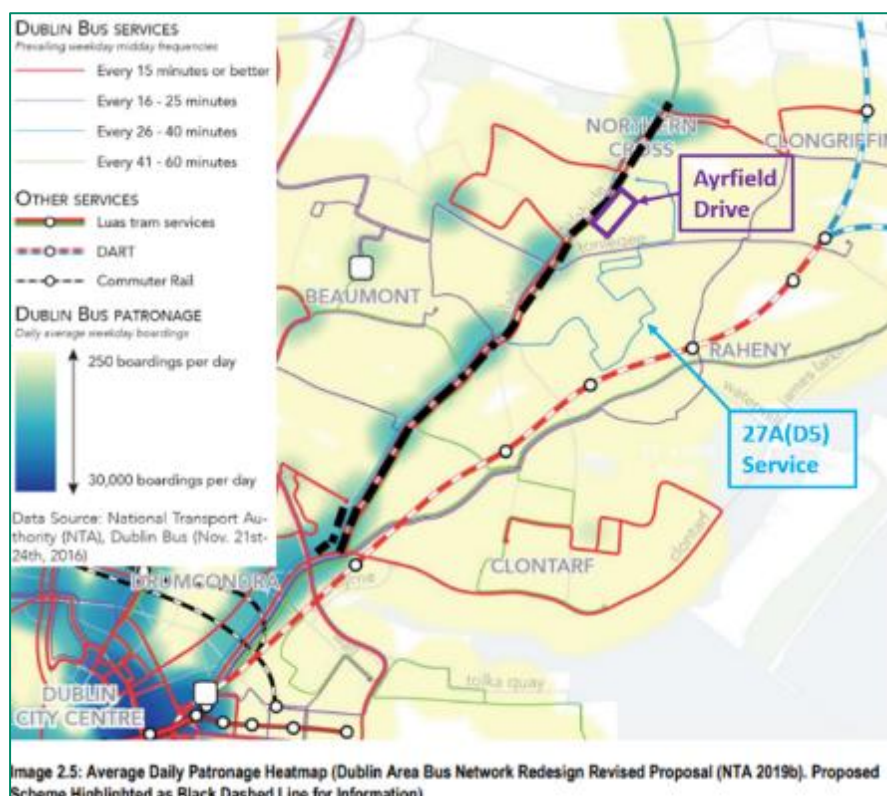


Figure 2.1.16: Existing 27A (D5) service

Figure 2.1.15 above also shows that the orbital N6 bus will be the only service running along Tonleegge Road and while the N6 service is within the catchment area of part of the southern section of the Ayrfield estate and provides access to the orbital service, it would only serve residents wishing to travel towards the city centre or towards Clongriffin by such users interchanging at Malahide Road to access the direct D1 and D3 services along the Proposed Scheme.

Overall need for the proposed pedestrian and cyclist link

EIAR Chapter 6 Traffic and Transport, Section 6.4.6.2.4 People Movement provides an overall assessment of the Proposed Scheme and concludes that it will deliver a Positive, Very Significant and Long-term impact in terms of People Movement by sustainable modes. The Proposed Scheme will deliver significant improvements in people movement by sustainable modes along the Proposed Scheme corridor, particularly by bus, with reductions in car mode share due to the enhanced sustainable mode provision.

Section 6.4.3.2 of EIAR Chapter 6 also highlights that to limit the growth in car traffic, and to ensure that this demand growth is catered for predominantly by sustainable modes, a number of measures will be required, that include improved sustainable infrastructure and priority measures delivered as part of the NDP/GDA Strategy. In addition to this, demand management measures will play a role in limiting the growth in transport demand, predominantly to sustainable modes only. As a result there will be only limited or no increases overall in private car travel demand. The Proposed Scheme will play a key role in this as part of the wider package of GDA Strategy measures.

The proposed link to Ayrfield Drive supports the improvements in people movement by sustainable modes at this location and the importance of, and the need for, the proposed link will become more pressing in the future as demand management measures will play a role in limiting the growth in transport demand predominantly to sustainable modes only.

In addition, as noted in Table 2.1.5 above, the Dublin City Development Plan includes policy 'MT11: To continue to promote improved permeability for both cyclists and pedestrians in existing urban areas in line with the National Transport Authority's document 'Permeability – a best practice guide.'

The NTA document: Permeability in Existing Urban Areas Best Practice Guide 2015 is referenced in the Dublin City Development Plan, as set out in Table 2.9 of Section 2.3.5.1 of the EIAR Chapter 2, The Introduction to this on page 1 states that the policy guidance has been developed 'on how best to

facilitate demand for walking and cycling in existing built-up areas. This includes creation of linkages within the urban environment for people to walk and cycle from their homes to shops, schools, local services, places of work and public transport stops and stations.'

The link proposed for Ayrfield Drive is a good example of this as the link and associated signalised crossing of the Malahide Road will provide a much shorter walk for residents to the established commercial and retail area on the western side of the Malahide Road.

Summary of Response

The preceding pages describe how the statutory application documentation comprehensively set out why the proposed link between Ayrfield Drive and the Malahide Road is proposed and demonstrate the need for it. It is an important piece of infrastructure that supports the significant improvements in people movement by sustainable modes which are necessary at this location.

ii. Consultation undertaken

Summary of Issue

Some submissions raised the issue of a lack of consultation, communication and engagement with residents, in particular those who believed their property is directly impacted by the Proposed Scheme. Others queried why the public consultation had been undertaken while government restrictions relating to the Covid pandemic were in place, and some commented that they had not had the opportunity to be involved in the consultation process. This issue was raised by the following 7 submissions in response to the Proposed Scheme:

12, 17, 19, 20, 57, 66, 69

Response to issue

The Public Consultation Report 2018-2022 provided in the Supplementary Information for the Proposed Scheme outlines the extensive public consultation and stakeholder engagement undertaken during that period, with three rounds of non-statutory public consultation undertaken.

Throughout the three rounds a number of consultation tools were used, including:

- a dedicated website, launched in May 2017;
- an individual brochure for the Proposed Scheme (updated at all 3 rounds);
- public information events (in person for first and second rounds, virtual for third round),
- Community Forum events, to create a two-way communication process with representatives of local communities, (in person for first and second rounds, virtual for third round, average attendees 24);
- range of digital channels, including Twitter and Facebook;
- traditional published material;
- press and radio advertising;
- outdoor advertising;
- presentations; and
- infographics.

The public events took place in accessible venues chosen to maximise the level of local engagement and attendance where possible. These events allowed members of the public to speak directly and in detail with members of the BusConnects Infrastructure team about the proposals. These non-statutory Public Information Events were advertised in local newspapers, through radio, on the BusConnects website, through extensive email reminders to public representatives, Local Authorities' Public Partnership Networks (PPN's), emails to Community Forum members, promoted through social media and digital channels.

The following paragraphs provide more details of each of the three rounds on non-statutory consultation for the Proposed Scheme.

First non-statutory round of public consultation

The first non-statutory round of public consultation for the Clongriffin to City Centre Core Bus Corridor Emerging Preferred Route Option (EPRO) took part from 14th November 2018 to the 29th March 2019. The first Community Forum meeting for the Clongriffin to City Centre Core Bus Corridor took place on 11th December 2018 at the Hilton Hotel, Malahide Road with approximately 20 representatives in attendance. A Public Information Event was held at the Hilton Hotel, Malahide Road on the 10th January 2019.

The scheme drawings in the published consultation brochure highlighted the potential for the new link to Ayrefield Drive, see Figure 2.1.17 below.

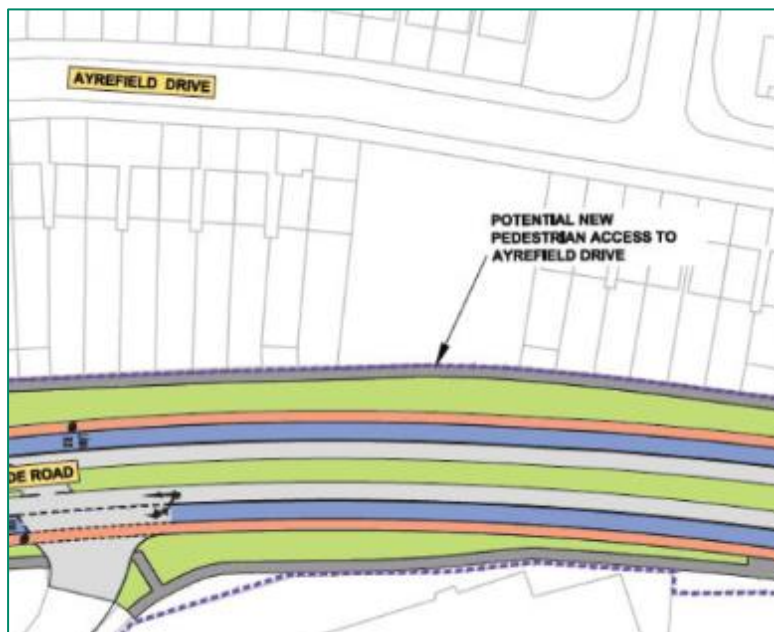


Figure 2.1.17: Extract from EPRO Drawings - First round of non-statutory consultation

There were 91 submissions received relating to the Clongriffin to City Centre Core Bus Corridor, with no comments recorded in relation to the potential for a proposed pedestrian link to Ayrefield Drive.

Second non-statutory round of public consultation

A second Community Forum event was held at the Hilton Hotel, Malahide Road on the 11th September 2019, with approximately 15 in attendance. This Community Forum was held in advance of the launch of second round of non-statutory public consultation. The meeting aimed to keep members updated on the design process between the first and second consultation.

In March 2020, the Draft Preferred Route Option (PRO) was published and a second non-statutory round of public consultation commenced on 4 March 2020 and ran until 17 April 2020. The consultation was announced via press release and a media press release and included a Public Information Event at the Bonnington Hotel in Whitehall on the 11th March 2020 from 9:30am to 7:30pm.

The scheme drawings in the published consultation brochure highlighted the potential for the new pedestrian / cyclist link to Ayrefield Drive, as well as a new proposed signalised crossing of the Malahide Road along with new bus stops, see Figure 2.1.18 below.

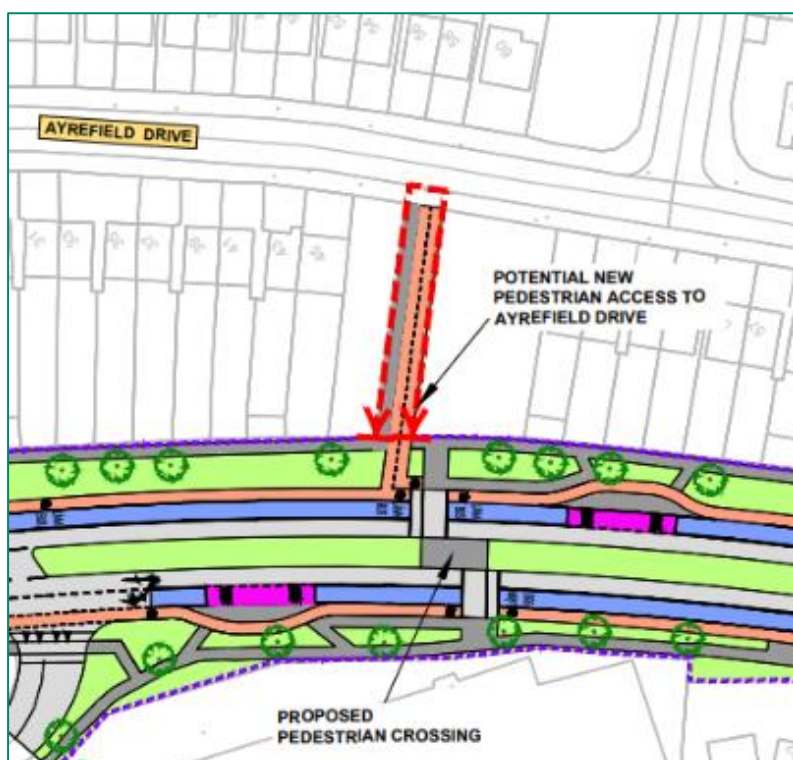


Figure 2.1.18: Extract from Draft PRO Drawings - Second round of non-statutory consultation

Due to the COVID-19 pandemic, all events scheduled after 12 March 2020 were cancelled. In deference to the submissions we had already received, the decision was made not to cancel the consultation. Consequently, there were just 30 submissions received relating to the Clongriffin to City Centre Core Bus Corridor, none of which related to the potential new link to Ayrfield Drive.

Third non-statutory round of public consultation

The third round of non-statutory public consultation took place from 4th November 2020 until 16th December 2020 on the updated Draft Preferred Route Option for the Proposed Scheme. The consultation was announced via press release, on the NTA website and on social media. Public representatives were made aware of the publication of the revised proposals via email. This email also contained information on Community Forums for TDs, Senators and Councillors to assist in spreading awareness of the meetings. A briefing session was organized via Zoom to take place on 4 November 2020. Members of the Transport & Communications Networks Oireachtas Committee were separately made aware of the launch.

Due to the Covid19 pandemic, which commenced with restrictions in March 2020 and continued throughout the second and third public consultation rounds, the BusConnects Infrastructure team developed online and virtual elements to assist the public in viewing and reading the proposals. Our primary virtual interactive tool during the final third phase of public consultation was the use of virtual consultation rooms available through the BusConnects website. These rooms were online for a six week period (24hrs x 7 days a week) and included the following:

- all Scheme materials available for perusal, such as the brochure, maps and all associated support documentation;
- an audio description of the brochure information; and
- a call back facility within the virtual rooms for any stakeholder to book a phone call back from a member of the BusConnects Infrastructure team for additional information or more detailed queries.

These Virtual Consultation Rooms replaced the more traditional Public Information Events due to the Covid restrictions on face-to-face interactions, typically used during non-statutory public consultation. Compared to the face-to-face Public Information Events utilised during the first and second rounds of Non-Statutory Public Consultation the numbers of the public that engaged increased significantly due to the online access available through this facility. Over the seven weeks of the consultation, 363 unique users visited the virtual information room for Clongriffin to City Centre Core Bus Corridor.

In addition, a third, virtual, Community Forum meeting took place on 18th November 2020 with approximately 15 representatives in attendance. At this meeting a question was asked by an elected representative about the proposed link to Ayrefield Drive, citing concerns about rat-running by vehicular traffic. The NTA team attending clarified that the proposal was to allow access for pedestrians and cyclists only and vehicular traffic would not be permitted.

The scheme drawings in the consultation brochure highlighted a slightly revised arrangement for the new pedestrian / cyclist link to Ayrefield Drive, as well as a slightly revised signalised crossing of the Malahide Road along with new bus stops, see Figure 2.1.19 below.



Figure 2.1.19: Extract from Updated Draft PRO Drawings - Third round of non-statutory consultation

Advertisements detailing where interested parties could access further information on the CBC including viewing the proposals, making a submission and attending information events were placed in local and national newspapers, online and in highly visible areas around the Greater Dublin Area. There were 150 submissions relating to the Proposed Scheme during this round of non-statutory public consultation.

The public consultation submission reports provided as Appendices A and B to the Preferred Route Option Report, provided as part of the Supplementary Information, do not record any submissions made to the three rounds on non-statutory consultation in respect of the proposed link to Ayrefield Drive.

Statutory round of public consultation

As part of the statutory public consultation in addition to the notices required by statute to be published in the newspaper, public notices were also placed at 25 locations along the route of the Proposed Scheme so as to ensure that members of the public in the area who may not have noticed the statutory newspaper notice or whose lands were not being acquired and so were not part of the CPO process were informed of the Proposed Scheme, as shown in Figure 2.1.20 below.

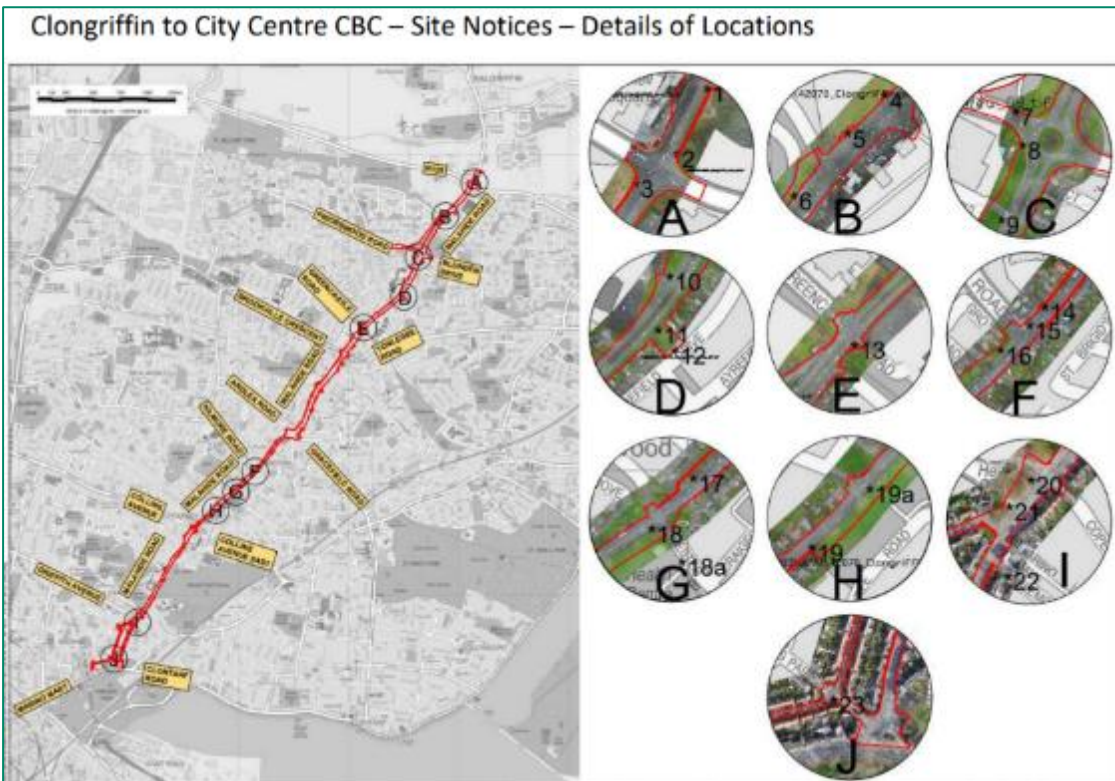



Figure 2.1.20: Location of non-statutory public notices erected during statutory consultation


Location D included site notices 11 and 12, each comprising two A3 sized notices; site notice 11 was erected on the Malahide Road side of the boundary wall to the green area and site notice 12 was erected on the edge of the green area close to the footpath along Ayrfield Drive, as shown in Figure 2.1.21 below. The notices themselves are shown in Figure 2.1.22 and Figure 2.1.23.




Figure 2.1.21: Non-statutory Site Notices Location D-11 and D-12



NTA
Udarás Náisiúnta Iompair
National Transport Authority



BUS CONNECTS
www.transportconnects.ie



Rialtas na hÉireann
Government of Ireland
2020

**CLONGRIFFIN TO CITY CENTRE
CORE BUS CORRIDOR SCHEME
COMPULSORY PURCHASE ORDER 2022
SITE NOTICE**

NOTICE IS HEREBY GIVEN THAT THE NATIONAL TRANSPORT AUTHORITY HAS MADE:
**CLONGRIFFIN TO CITY CENTRE CORE BUS CORRIDOR SCHEME
COMPULSORY PURCHASE ORDER 2022**
WHICH IS BEING SUBMITTED TO AN BORD PLEANALA FOR CONFIRMATION

IF CONFIRMED, THIS ORDER WILL AUTHORISE THE NATIONAL TRANSPORT AUTHORITY TO ACQUIRE COMPULSORILY THE FOLLOWING LAND AND/OR RIGHTS DESCRIBED IN PART I AND PART IV (SECTION A) OF THE SCHEDULE (SEE ACCOMPANYING EXTRACT) FOR THE PURPOSES OF CONSTRUCTION OF THE CLONGRIFFIN TO CITY CENTRE CORE BUS CORRIDOR SCHEME FOR THE PURPOSES OF FACILITATING PUBLIC TRANSPORT, AND TOGETHER WITH ALL ANCILLARY AND CONSEQUENTIAL WORKS ASSOCIATED THEREWITH.

A copy of the order and of the maps referred to in it may be seen at:

National Transport Authority
Din Seánas
Harcourt Lane,
Dublin 2
D02 WT20

An Bord Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V9R2

on working days between the hours of 9:30am and 5:30pm from Thursday 07th April 2022 to Thursday 02nd June 2022.

A copy of the order and of the maps referred to in it is also available on the National Transport Authority website for the Clongriffin to City Centre Core Bus Corridor Scheme at www.clongriffintransport.ie

Any objection to the order should be made in writing to An Bord Pleanála (Strategic Infrastructure Division), 64 Marlborough Street, Dublin 1, D01 V9R2, so as to reach the said Board before 5:30pm on the 02nd day of June 2022.

Additional information in relation to the Clongriffin to City Centre Core Bus Corridor Scheme including a copy of the Environmental Impact Assessment Report (EIA) and the Natura Impact Statement (NIS) are also available at the above location for inspection and/or purchase (in the case of the EIA/NIS) and for inspection and downloading on the above mentioned website. Submissions/observations may be made in writing to An Bord Pleanála in relation to (i) the likely effects on the environment of the proposed road development, if carried out, for proper planning and sustainable development in the area in which it is proposed to situate the proposed road development, and (ii) the likely significant effects of the proposed road development on a European site between Thursday 07th April and Thursday 02nd June 2022. Any submissions/observations must be accompanied by a fee of €50 (except for certain prescribed bodies) and must be received by the Board not later than 5:30 pm on the 2nd June 2022.


Such submissions/observations must also include the following information:

- The name of the person making the submission or observation, the name of the person acting on his or her behalf, if any, and the address to which any correspondence relating the application should be sent,
- The subject matter of the submission or observation, and
- The reasons, consideration and arguments on which the submission or observation is based in full (Article 217 of the Planning and Development Regulations 2001, as amended, unless).

Submissions/observations can also be made on the An Bord Pleanála website at the following address:
<https://anbord.pleanala.ie/en/submitobservation>. Any enquiries relating to the application process should be directed to the Strategic Infrastructure Development Section of An Bord Pleanála (Tel. 01-8388100).

A person may question the validity of any decision by the Board on a proposed road development by way of an application for judicial review under the Rules of the Superior Courts (and in particular Order 84 of the Rules of the Superior Courts contained in S.I. No. 15 of 1985 as amended) and in accordance with sections 90, 90A and 90B of the Planning and Development Act 2000 (as amended).

Practical information on the review mechanism can also be accessed under the heading: "Legal Notices - Judicial Review Notices" on An Bord Pleanála website www.pleanala.ie. This information is also available on the Citizens Information Service website www.citizensinformation.ie.

Signed: 
Ailín O'Leary
Head of Bus Connects Dublin Infrastructure,
National Transport Authority

Date of execution of site notice: 07/04/2022

SCHEDULE (EXTRACT) PART I Lands Being Permanently Acquired

Number on map deposited at NTA	Quantity, Description and situation of land	Owners or Proposed Owners	Lessors or Proposed Lessors	Occupiers
D09(1) 17	Area (Ha): 0.13409 Area (sq-ft): 1341.9 Description: Recreational County: Dublin Address: Open space between 458-47, Ayrfield Drive, Dublin 12	Mrs. Fíona Harrott, 17A Hillview, Rathcoole, Co. Dublin. Mr. Jeremiah Harrott, 17A Hillview, Rathcoole, Co. Dublin.	None	Dublin City Council, Civic Offices, Wood Quay, Dublin 8, D08 R23P Elicon Ltd., Eir Network Management Centre, 2022 Biscuit Avenue, Clayton Business Campus, Dublin 25, D24H200 Electricity Supply Board, Two Gateway, East Wall Road, Dublin 3, D03 A992

SCHEDULE (EXTRACT) PART IV (SECTION A) Description of private rights to be acquired

Reference Number	Description	Owners or proposed owners of the Right to be Acquired
CT	All private rights within the area shaded orange and labelled 'CT' on the Deposit Map reference 0601-100-004 associated with plot reference D09(1) 17 as described in Part I of the Schedule.	Dublin City Council, Civic Offices, Wood Quay, Dublin 8, D08 R23P Elicon Ltd., Eir Network Management Centre, 2022 Biscuit Avenue, Clayton Business Campus, Dublin 25, D24H200 Electricity Supply Board, Two Gateway, East Wall Road, Dublin 3, D03 A992

Figure 2.1.22: First A3 sheet of Non-statutory Sites Notices D-11 and D-12

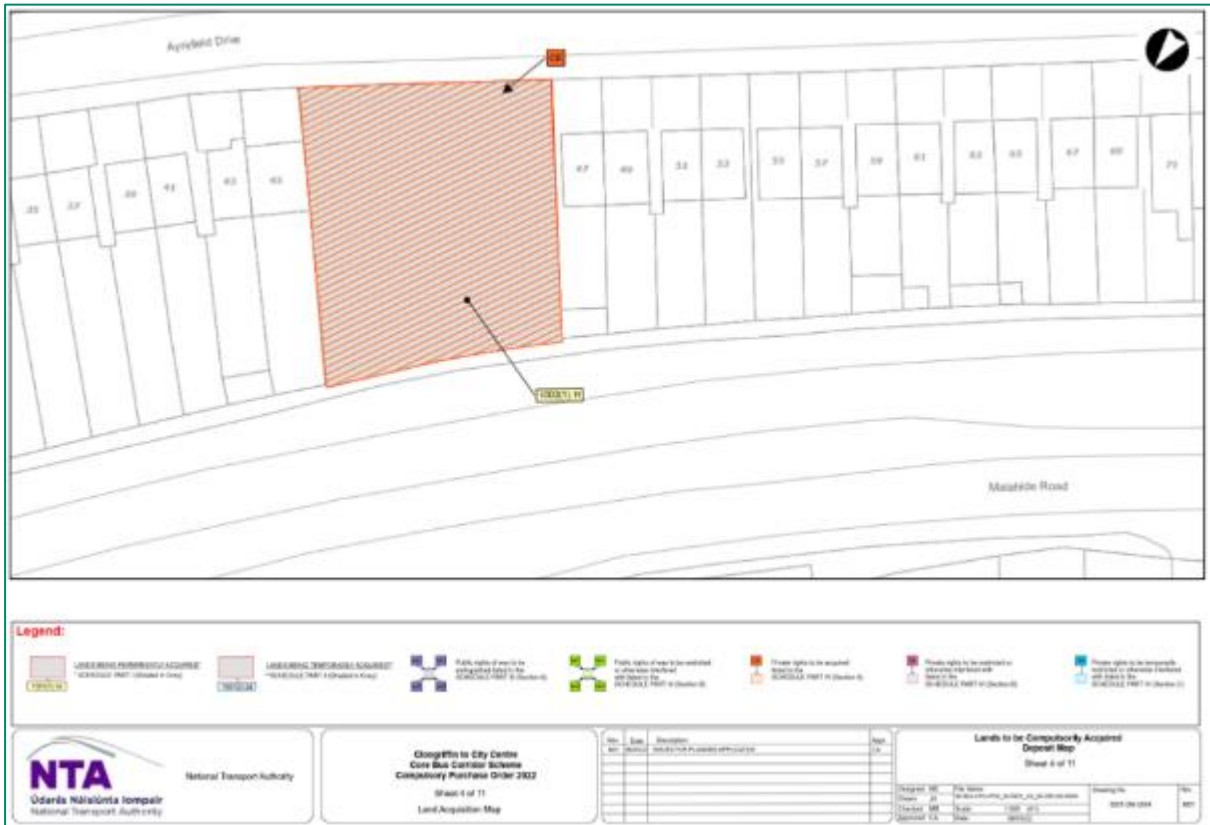


Figure 2.1.23: Second A3 sheet of Non-statutory Sites Notices D-11 and D-12

iii. Potential for increase in crime / anti-social behaviour / security / child safety and protection for increase in crime / loss of security

Summary of Issue

All of the submissions stated that they believed there was a risk of an increase in crime / public order offences and / or anti-social behaviour, including loitering, littering, illegal dumping, and riding of scramblers/motorbikes, as well as a loss of security, in the residential estate as a result of the new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road as it would provide an easy route for criminals to quickly exit the estate.

The majority of those making submissions stated that they believed that the inclusion of the new link would create a child safety issue with the potential for unsupervised children able to leave the estate and access the main road. Other submissions raised concerns about increased risk of child abduction and the stealing of pets.

Response to issue

Section 10.2.1 of the EIAR Chapter 10 Population, and Appendix A10.2 to Chapter 10, assesses the Economic Impact of the Core Bus Corridors, which includes consideration of the impact of transport infrastructure on criminal activity. The conclusion reached on page 25 is that *“the new infrastructure improvements should have a direct and immediate impact on crime along the corridors. It will provide better, safer and more visible bus stops whilst also improving the wider public realm infrastructure through investments such as improved street lighting. This will act as a direct deterrent to criminal activity and result in a reduction in crime. This in turn has been shown to encourage people onto the streets into the evening which will also support the night time economy in community centres.”*

Section 3.2.3 a), Section 10.4.4.1.1 of EIAR Chapter 10 Population considers the Community Amenity and for the Ayrfield community area this is assessed a Positive, Not Significant and Long-Term impact. Additional information in relation to the potential community impacts arising from crime and antisocial behaviour is set out in EIAR Chapter 10 Population Appendix A10.2 Economic Impact of the Core Bus Corridors, which notes the following:

- *Good infrastructure has also been shown to have a positive impact on levels of crime, particularly low level crimes such as theft and vandalism. There is evidence from a wide range of studies that redesigned public realm, especially those which are better lit and more visible, see significant reductions in the level of crime.*
- *A study from Los Angeles in the late 1990s discovered that the location and visibility of bus stops can have an impact on crime. Where bus stops were clearly visible, offered shelter to the user and were on streets with high levels of vehicle traffic, criminal activity was less common. In contrast, crime rates were found to be higher if the bus stop was at an intersection with an alley, next to off-licences, cashpoint services, vacant buildings or on-street parking, or in areas where there was a lot of graffiti and litter.*

The NTA document: Permeability in Existing Urban Areas Best Practice Guide 2015, referenced in the Dublin City Development Plan (as mentioned in response to issue i) supports this assessment. This policy guidance states that *“a higher number of pedestrians and cyclists in housing estates and neighbourhood centres also changes the perception of a place in terms of safety. Passive supervision, the mere presence of more people, makes the place safer. By maintaining or creating links for pedestrians and cyclists, this enhanced safety can be provided”*. The document goes on to state that *“If people have a higher tendency to walk and cycle around their neighbourhood, they are more likely to meet each other. Often it is these meetings which give a sense of community more than formal arrangements and a greater sense of community is often cited as a key requirement in addressing many anti-social behaviour problems in Irish urban areas.”* This is directly applicable to the proposed link to Ayrfield Drive for pedestrians and cyclists.

This Best Practice Guide also includes a case study from Dargle Wood, Knocklyon which is relevant to the new link to Ayrfield Drive. The case study notes that proposals for the permeability link at Knocklyon through Dargle Wood open space *“generated considerable concern in the immediately adjacent area, mainly with regard to the risk of increased anti-social behaviour, increased litter and increased pedestrian and cyclist traffic through the open space where there was no existing east-west route.”*

The Best Practice Guide also includes following text provided by a local resident and member of the Residents Association Committee when discussing views amongst residents before implementation of the Dargle Wood Scheme: *'This green space has a long history of antisocial behaviour... drugs, alcohol abuse, loitering motorbiking etc. Residents thought that making the area more accessible and providing public lighting would worsen these problems and they opposed the project on these grounds.'*

The following text is provided by the same local resident, indicating how residents' views have changed as a result of the modified scheme. *'Residents' fears and concerns of a worsening antisocial behaviour situation has not materialised to date and the amended project carried out has so far brought improvements that can be built upon...the putting in place of the review process post project (evaluation) has also helped to assuage residents' concerns in the event that adjustments may be required'*

In summary, the case study demonstrates that improved pedestrian and cycling links, such as the proposed pedestrian and cyclist link between Ayrfield Drive and the Malahide Road will have a positive impact on residential amenity, rather than leading to an increase in crime and anti-social behaviour.

iv. Loss of Green / Community Space

Summary of Issue

The majority of the submissions objected to the loss of the green space which they stated is used daily by young children and families from within the estate, which provides benefits particularly for young children as the space is viewed as a secure and enclosed space.

This issue was raised by the following 60 submissions in response to the Proposed Scheme:

4, 9, 11, 12, 14, 16, 17, 18, 19, 21, 22, 23, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 36, 37, 38, 39, 40, 41, 42, 44, 45, 47, 49, 50, 51, 52, 53, 54, 55, 57, 58, 60, 62, 63, 66, 69, 70, 78, 80, 82, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94

Response to issue

As highlighted earlier, the NTA document: Permeability in Existing Urban Areas Best Practice Guide 2015, referenced in the Dublin City Development Plan (as mentioned in response to issue i) states that *"a higher number of pedestrians and cyclists in housing estates and neighbourhood centres also changes the perception of a place in terms of safety. Passive supervision, the mere presence of more people, makes the place safer. By maintaining or creating links for pedestrians and cyclists, this enhanced safety can be provided"*.

The existing green space is to be retained and Chapter 17 Landscape (Townscape) and Visual of the EIAR assesses the impact of the proposed scheme on amenity values during the operation phase. In Section 17.4.4.1.8 Amenity Designation it assesses that:

"Ayrfield Open Space will remain as open space with additional footpath / cycle track link to Ayrfield Drive. The change is limited in scale and characteristic in the context, with a beneficial impact on access. The magnitude of change is low. The townscape / streetscape and visual effect of the Operational Phase on Ayrfield Open Space will be Slight, Long-Term, Positive"

v. Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor

Summary of Issue

Many submissions expressed the view that there was a risk of increased vehicular traffic within the estate associated with parking / dropping off passengers for the CBC in light of the new link providing direct access to the new bus stops. One submission cites existing parking issues at local Dart stations.

This issue was raised by the following 57 submissions in response to the Proposed Scheme:

4, 9, 11, 12, 13, 16, 17, 19, 21, 22, 23, 26, 27, 28, 29, 30, 31, 32, 33, 34, 36, 37, 38, 39, 40, 41, 42, 44, 45, 47, 49, 50, 51, 52, 53, 54, 55, 57, 58, 60, 62, 63, 66, 69, 70, 77, 78, 80, 82, 85, 86, 87, 88, 89, 90, 91, 94

Response to issue

Due to the location of the residential estate along the Proposed Scheme corridor and that it can only be accessed by car via Blunden Drive or Tonlegee Road it is considered that the journey time associated with driving by car into the Ayrfield estate to park and access the new bus stops via the proposed link would be highly unattractive to potential bus passengers and will not lead to any significant increase in vehicular traffic within the estate.

vi. Increased air and noise pollution

Summary of Issue

Many of submissions felt that the removal of the wall over the length of the plot would give rise to an increase in noise pollution and a reduction in air quality, arising from exposure to the traffic on the Malahide Road.

This issue was raised by the following 30 submissions in response to the Proposed Scheme:

9, 12, 16, 17, 21, 23, 26, 28, 33, 34, 36, 37, 38, 39, 40, 44, 52, 53, 54, 55, 57, 60, 62, 66, 69, 82, 86, 87, 88, 94

Response to issue

Air Quality

The impacts of the Proposed Scheme on air quality have been assessed and are reported in Chapter 7 Air Quality of Volume 2 of the EIAR as set out below.

In terms of construction dust impacts, the removal of a section of wall between the housing estate and the Malahide Road is not considered significant demolition activity and therefore no significant impacts to air quality due to dust generation will occur. All potential demolition activities have been considered and none are reported in Section 7.4.2.1.1 as none have significant dust generating potential.

Section 7.4.3.3 of Chapter 7 Air Quality of Volume 2 of the EIAR provides the operational phases predicted change in and impact on pollutant concentrations in 2028 as a result of the Proposed Scheme. The significance of the changes in the concentration of each of the ambient receptors has been determined in the context of the TII significance criteria (TII 2011) and are summarised as follows:

- the majority of modelled receptors are estimated to experience a negligible impact due to the Proposed Scheme in terms of the annual mean NO₂ concentration;
- the Proposed Scheme will be overall neutral in terms of annual mean PM₁₀ concentrations, with all receptors experiencing a negligible impact;
- the Proposed Scheme will be overall neutral in terms of the annual mean PM_{2.5} concentration with all receptors experiencing a negligible impact; and
- In accordance with the EPA Guidelines (EPA 2017) the impacts associated with the Operational Phase traffic emissions pre-mitigation are overall neutral and long-term.

In relation to the removal of the section of boundary wall at the green area between Malahide Road and Ayrfield Drive, there are no additional road traffic impacts to local air quality in this area in either construction or operational beyond what is reported above.

Noise

The impacts of the Proposed Scheme on noise and vibration have been assessed and are reported in Chapter 9 Noise and Vibration of Volume 2 of the EIAR. The traffic noise impacts associated with the Proposed Scheme have fully considered any physical changes along the proposed scheme with potential to alter traffic noise levels. As discussed in Chapter 9 Section 9.4.4.1, the assessment calculations take account of changes to the alignment of bus lanes, traffic lanes where they deviate from the existing cross section. This also includes for areas where boundary treatments are altered, as it the case with Ayrfield Drive. The impact assessment also considers the traffic flow along the Proposed Scheme during both the Do Minimum scenario (the Proposed Scheme does not proceed) and the Do Something Scenario (with the Proposed Scheme). Along the Malahide Road, there is a forecast reduction in overall traffic volumes with the Proposed Scheme in place.

A boundary wall of approximately 30m in length will be removed between the green area within Ayrfield Drive and the Malahide Road. The closest noise sensitive locations (NSLs) to this area are residential dwellings along the immediate boundary of this green area within Ayrfield Drive. The existing property boundary 2m high wall separating the green area from these properties will remain in place, thus providing a continuous boundary wall between the Malahide Road to the rear and side of the properties and along the green area. Traffic noise levels at the rear façade of these properties remain dominated by the Malahide Road during the Do Something scenario. The calculated change in traffic noise levels at NSLs within Ayrfield Drive taking account of traffic volumes, alignment and boundary changes is neutral to slight as discussed in Section 9.4.4.1.1.5 of the EIAR.

For the properties on Ayrfield Drive that face the green area impacts are defined as 'slight', with noise level increases of the order of 1dB and the specific noise levels are below those defined as significant.

In Chapter 10 Population of Volume 2 of the EIAR, Section 10.4.4.1.1 considers Community Amenity impacts, which arise from a combination of traffic, air quality, noise and visual impacts. It concludes that there will be reduced air and noise impact along the route in general, leading to a positive, not significant, long term impact.

2.1.5 Non-common Issues Raised

vii. Visual Impact / Loss of privacy

Summary of issue

This issue of visual impact was raised by submission 12, from the residents of number 60 Ayrfield Drive which is directly opposite the green area. Their submission stated that the proposed removal of the wall to the green area would have a visual impact as they would now have a view of constant traffic.

Submission 9 (residents of 47 Ayrfield Drive) expressed the view that they would experience a loss of privacy as a result of the new proposed bus stop on the Malahide Road to the rear of the property overlooking the back garden.

Submissions 9 and 12 (residents of 60 Ayrfield Drive), expressed the view that there would be a loss of privacy arising out an increase in the number of people passing their property.

Response to issue

In respect of the issue of overlooking of the back garden of no 47 Ayrfield Drive, as shown in Figure 2.1.24 below, there is an existing footpath on the Malahide Road along the existing boundary wall to the back of the garden, which is approximately 1.8m to 2m in height.



Figure 2.1.24: Existing Malahide Road and Footpath to rear of 47 Ayrfield Drive (Image Source: Google)

Reference to the EIAR Volume 3 Chapter 4 Proposed Scheme Description Figures, General Arrangement drawings, see extract in Figure 2.1.25 below, shows that the boundary walls to the rear and side of 47 Ayrfield Drive are to remain. In addition, the proposed bus stop and passenger waiting area will be accommodated within the space occupied by the existing cycle land and grassed verge, with existing trees and footpath retained. As such there will be no change to the existing situation in terms of any potential for overlooking the back garden of number 47 Ayrfield Drive.



Figure 2.1.25: Extract from General Arrangement Drawings showing boundary wall retained

In relation to the concern raised about loss of privacy, and visual impact, Figure 2.1.25 above, shows that the Proposed Scheme does not include any changes to the boundary walls to the sides of numbers 45 and 47 Ayrfield Drive, or to the existing footpaths on Ayrfield Drive. In addition, in respect of the concern about an adverse visual impact on 60 Ayrfield Drive as a result of the boundary wall to the rear of the green area being removed, reference to the EIAR Volume 3 Chapter 4 Proposed Scheme Description Figures, Landscaping General Arrangement drawings, see extract in Figure 2.1.27 below, show that three “woodland copses” are proposed within the green area to supplement the existing trees that are present. These three landscaping features will provide substantial screening

between the properties opposite the green area, including 60 Ayrfield Drive, and the Malahide Road. Section 17.4.4.1.8 of EIAR Chapter 17 Landscape (Townscape) and Visual assesses the overall impact on the Ayrfield open space as Slight, Long-Term, Positive.

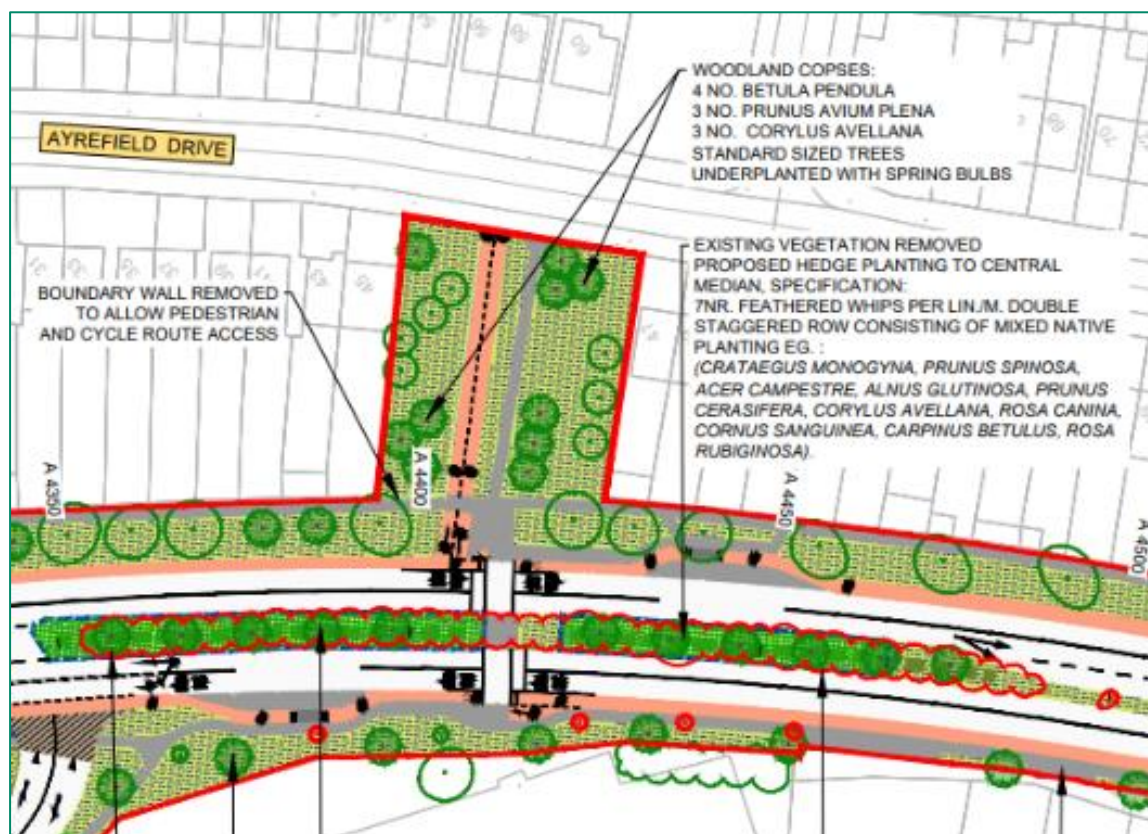


Figure 2.1.26: Extract from Landscaping General Arrangement Drawings showing proposed planting

viii. Loss of Property Value

Summary of issue

Submission 12 also expressed the view that the combined impact of all the issues raised would have an adverse and negative impact on the value of their property.

Response to issue

As regards the view expressed that the combined impact of all the issues raised would have an adverse and negative impact on the value of 60 Ayrfield Drive, EIAR Chapter 10 Population includes Appendix A10.2 Economic Impact of the Core Bus Corridors. Section 3 on page 14 the appendix discusses the impact of the Proposed Scheme on property prices. The conclusion reached is that in overall terms the public realm improvements planned by the NTA may lead to an increase in value of both residential and retail property prices, especially in the community centres along the corridors, with evidence showing that investing in public realm creates improved spaces that are more desirable for people and business to locate in, thereby increasing the value of properties in the area.

2.2 Haverty Road

2.2.1 Overview of Proposed Scheme

As described in paragraph 4.5.2.1 of Chapter 4 of the EIAR, at the southern end of the Proposed Scheme an alternative cycle route is proposed through a parallel, less trafficked quiet route along Carleton Road, St Aidans Park, Haverty Road and Marglann Marino. Cyclists will then re-join at Marino Mart and tie-in with the separate Clontarf to City Centre Cycle & Bus Priority Project, which is being advanced by DCC and has received Part VIII approval. It is proposed to close Haverty Road for vehicular traffic at the St Aidan's Park end of the street. Local traffic access will be from the Marino Park Avenue end of the street, see Figure 2.2.1 below.

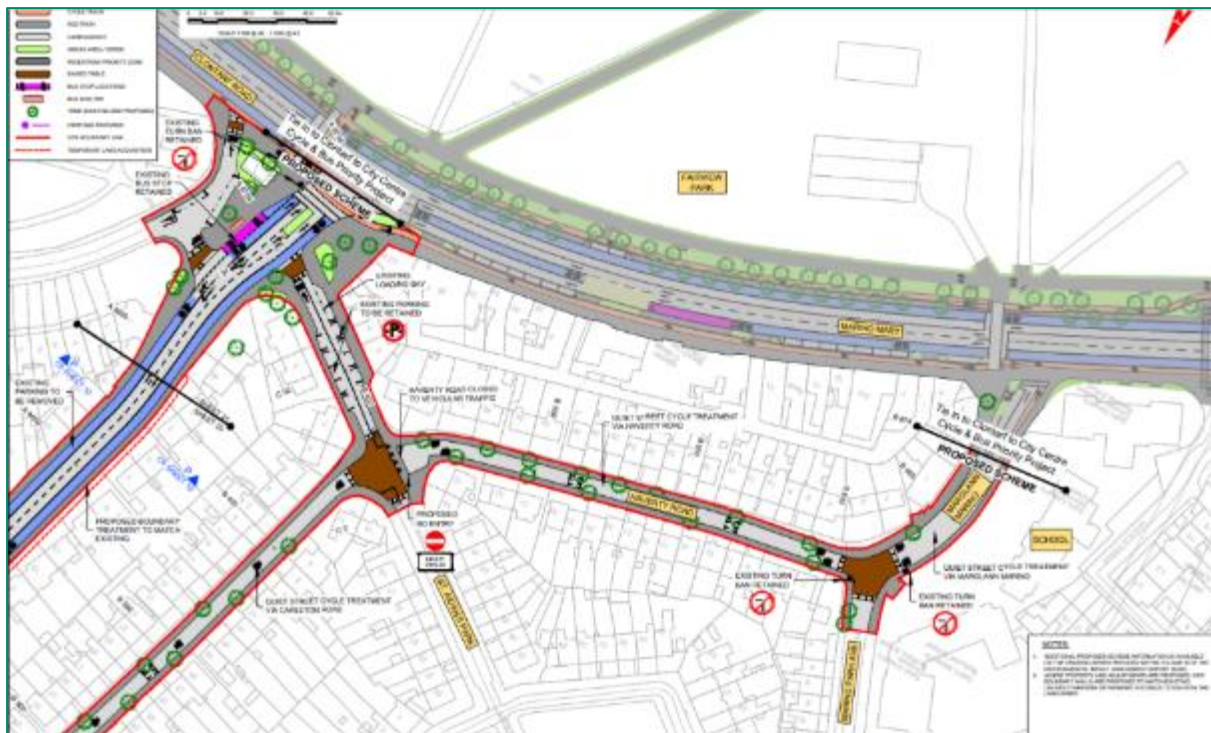


Figure 2.2.1: Proposed Closure of Haverty Road

2.2.2 Overview of Submissions Received

As shown in Table 2.2.1 below, six submissions were made in relation to the Proposed Scheme at this location, of which five fully (14, 15, 48, 72 and 79) supported the proposals and one (81) raised issues with the proposal. It is noted that submission 15 supporting the proposal was sent on behalf of a total of 34 residences along Haverty Road and Carleton Road.

Table 2.2.1: Submissions Made in Respect of Haverty Road

No Name		No Name		No Name	
14	Aodhan O Riordain TD	48	James English	79	Patricia Normanly & Patrick Claffey
15	Patrick Claffey & Others	72	Eva Gahan	81	Ruth Penny

The submissions supporting the proposals made the following 4 points as reasons why they were fully supportive of the closure of Haverty Road to through traffic.

i. Traffic Speed and rat running

Summary of point

This issue was raised by the following five submissions supporting the Proposed Scheme:

14, 15, 48, 72 and 79.

The submissions assert that Haverty Road and Carleton Road are subject to speeding traffic and rat running at peak times.

Response to point

The existing issue raised is considered valid and was taken into consideration when developing proposals for the Quiet Street treatment for the alternative cycle route.

ii. Pedestrian safety

Summary of point

This issue was raised by the following five submissions supporting the Proposed Scheme:

14, 15, 48, 72 and 79.

The submissions state that the route is used by a large number of school children attending St Joseph's schools on Marino Park Avenue and residents have campaigned for a number of years to improve safety along Haverty Road and Carleton Road for pedestrians.

Response to point

The existing issue raised is considered valid and was taken into consideration when developing proposals for the Quiet Street treatment for the alternative cycle route.

iii. Cyclist safety

Summary of point

This issue was raised by the following five submissions supporting the Proposed Scheme:

14, 15, 48, 72 and 79.

The submissions state that the route is used by a large number of children and commuter cyclists and again residents have campaigned for a number of years to improve safety along Haverty Road and Carleton Road for cyclists.

Response to point

The existing issue raised is considered valid and was taken into consideration when developing proposals for the Quiet Street treatment for the alternative cycle route.

The submission objecting to the closure of Haverty Road was number 81 and raised the following 2 issues:

i. Inadequacy of the Site Notice and Consultation

Summary of issue

The submission expressed the view that the site notice was inadequate in size and clarity and that all affected residents should have been issued with an explanatory leaflet.

Response to issue

The NTA complied with all the requirements in respect of statutory consultation and erected a number of non-statutory site notices, including the one on Haverty Road.

In addition, as described in the Public Consultation Report 2018-2022 provided in the Supplementary Information for the Proposed Scheme, the NTA undertook extensive public consultation and

stakeholder engagement during that period, including three rounds of non-statutory public consultation.

As part of the first round of non-statutory consultation for the Emerging Preferred Route Option for the Clongriffin Core Bus Corridor Scheme a deputation from the residents approached the NTA expressing their desire for Haverty Road to be closed for through traffic. Following this meeting the route along Brian Road, Carleton Road and Haverty Road was reviewed and it was concluded that closing the route to through traffic would significantly reduce the amount of rat running along these streets. This would also support the Quiet Street treatment proposed along this route as a safer environment for the cyclists given the width constraints along Malahide Road at the southern end of the scheme.

In the draft Preferred Route Option displayed during the second round of public consultation, the scheme proposals were amended to show the closure of Haverty Road at the St. Aidans Park end to vehicular traffic but with the intent to allow emergency vehicles through. The proposals were described thus in the consultation brochure:

“It is proposed to provide an alternative cycle route using a Quiet Street Treatment running parallel to the Malahide Road along Brian Road, Carleton Road and Haverty Road. Cyclists will then re-join Marino Mart and connect with the Clontarf to City Centre Cycle Scheme. The EPR indicated that Haverty Road would remain as a through route. After taking into account the safety and convenience of all road users as well as the residents of the area, it is now proposed to close Haverty Road for vehicular traffic at the St Aidan’s Park end of the street. This proposal will also help to further reduce through-traffic on Brian Road, Carleton Road and Haverty Road”.

Following the second non-statutory public consultation a number of residents along the roads affected wrote to thank the NTA for the changes and expressed their satisfaction with the proposed closing of Haverty Road. Similar sentiments were expressed during the third round of non-statutory public consultation.

ii. Impact on Residents / others and Unforeseen consequences

Summary of Issue

The submission cites previous statements from Dublin City Council that road closures are only recommended in exceptional circumstances as they can result in operational difficulties for essential traffic/deliveries, inconvenience to residents and other road users and have the potential to lead to increased traffic on other roads as traffic is displaced. It goes on to describe how in their view these issues could manifest themselves in this instance.

The submission also states that drivers wishing to gain access to Haverty Road from Marino Mart would have to proceed up St Aidan’s Park Road, around Marino Park and down Marino Park Avenue.

The submission also expresses the view that the rat running traffic will simply relocate to other streets and create the same safety issues on those streets.

Response to issue

The closure of Haverty Road is an essential component of the Quiet Street treatment for the alternative cycle route along Carleton Road, St Aidan’s Park, Haverty Road and Marglann Marino. As described in Section 3.2 of the Preferred Route Option Report, while the Emerging Preferred Route Option indicated that Haverty Road would remain as a through route, after taking into account the safety and convenience of all road users, as well as the residents of the area, it is now proposed to close Haverty Road for vehicular traffic at St Aidan’s Park Road end of the street. Provision is made to allow emergency vehicles use this junction. This proposal will also help to further reduce traffic on Brian Road, Carleton Road and Haverty Road, thus supporting the Quiet Street treatment.

The statement that drivers wishing to gain access to Haverty Road from Marino Mart would have to proceed up St Aidan’s Park Road, around Marino Park and down Marino Park Avenue appears to be a misunderstanding of the proposals. Drivers will still be able to access Marglann Marino from the existing junction with the Malahide Road, which will include access to Haverty Road, Marino Park Avenue and the wider Marino estate. Haverty Road is proposed to be closed to through traffic at its junction with St Aidan’s Park only, thus preventing through traffic accessing Carleton Road, as shown in Figure 2.2.2 below.



Figure 2.2.2: Access to Marino Estate from Malahide Road maintained

The impacts of the Proposed Scheme on traffic have been assessed and are reported in Chapter 6 of Volume 2 of the EIAR. The transport modelling undertaken for the assessment of the Proposed Scheme has considered the potential for traffic redistribution impacts resulting from the Proposed Scheme measures – Refer to Chapter 6 - Section 6.4.6.2.8 “General Traffic Assessment”.

To determine the impact that the Proposed Scheme has in terms of an increase in general traffic flows on the direct and indirect study areas, a robust assessment has been undertaken, with reference to TII’s Traffic and Transport Assessment Guidelines (May 2014). Diagram 6.27 and 6.28 (Chapter 6) outline the flow difference on road links comparing the Do Minimum and Do Something scenarios (with and without the Proposed Scheme). The results of this assessment show that there are no links in the Marino estate that experience traffic flow changes above the threshold level (2-way flow change of 100 passenger car units or more). This indicates that no roads in the Marino estate will experience a flow change of greater than approximately 1 vehicle per minute as a result of the Proposed Scheme.

2.3 Artane Cottages Lower

2.3.1 Overview of Proposed Scheme

As set out in Section 6.3.3.4.1 of Chapter 6 – Traffic and Transport of the EIAR, in general, the current layout at this location, south of the R808 Gracefield Road, is a single carriageway with two lanes in each direction, one standard lane and one bus lane, along with footpaths and advisory cycle lanes, until Donnycarney Road. It is noted that in the vicinity of Artane Cottages, the northbound bus lane is curtailed (between Kilmore Road and no 4 Artane Cottages Lower). At the junction of Kilmore Road, footpaths are also provided along with an outbound advisory cycle track.

As described in paragraph 4.5.2.1 of EIAR Chapter 4 Proposed Scheme Description, between Gracefield Road Junction and Killester Avenue Junction, it is intended to provide a continuous bus lane with a single general traffic lane in each direction. Dedicated cycle tracks and footpaths will also be provided through this section, including a section of realigned footpath, outbound, between Kilmore Road and St. David's Wood.

It is also proposed to place a new bus stop at approximate chainage A6575 outside 5 Artane Cottages Lower and 6 Artane Cottages Lower for inbound passengers. At this location it is proposed to provide a bus stop pole and a RTP1 sign. However, no bus shelter is proposed. A new bus stop is proposed at approximate chainage A6500 outside the Goblet Bar and Lounge for outbound passengers, including a bus stop pole, RTP1 sign and a shelter. The junction at Kilmore Road also includes an additional pedestrian crossing with protection island for the cycling crossing lanes. A waiting area for cyclists turning right from Malahide Road on to Kilmore Road has been included outside 9 Artane Cottages Lower.

An overview of the design evolution of the junction at this location (Kilmore Road/R107 Malahide Road) is provided in Appendix A6.3 - Junction Design Report of Volume 4 of the EIAR. Images of the junction layout from Concept Design, to Emerging Preferred Route, draft Preferred Route (2nd non-statutory public consultation), updated draft Preferred Route (3rd non-statutory public consultation, including the new bus stops) and final preliminary design are shown here also.

A small land acquisition is required from a shared laneway to the north of Artane Cottages Lower to facilitate relocation of a gate post. The issue is discussed in Section 3.2 of this report in relation to the CPO. The extents of the permanent land acquisition at this location is a continuation of the permanent land acquisition line from nos 2 and 1 Artane Cottage Upper immediately north of this location. This permanent land acquisition line is required to accommodate the proposed cross section of the Proposed Scheme at this location.

Drawing set **3. General Arrangement** are provided as an appendix to Chapter 4 – Proposed Scheme Description in Volume 3 of the EIAR. The Proposed Scheme at this location is detailed on Sheet 15 of this drawing set, an extract of which is provided in Figure 2.3.1 below, which shows the following three key features annotated, along with an extract of aerial photography showing the existing road layout.

- 1) Location of CPO
- 2) Grassed access lane to rear of cottages
- 3) Location of proposed bus stop
- 4) Proposed cycle turning facility

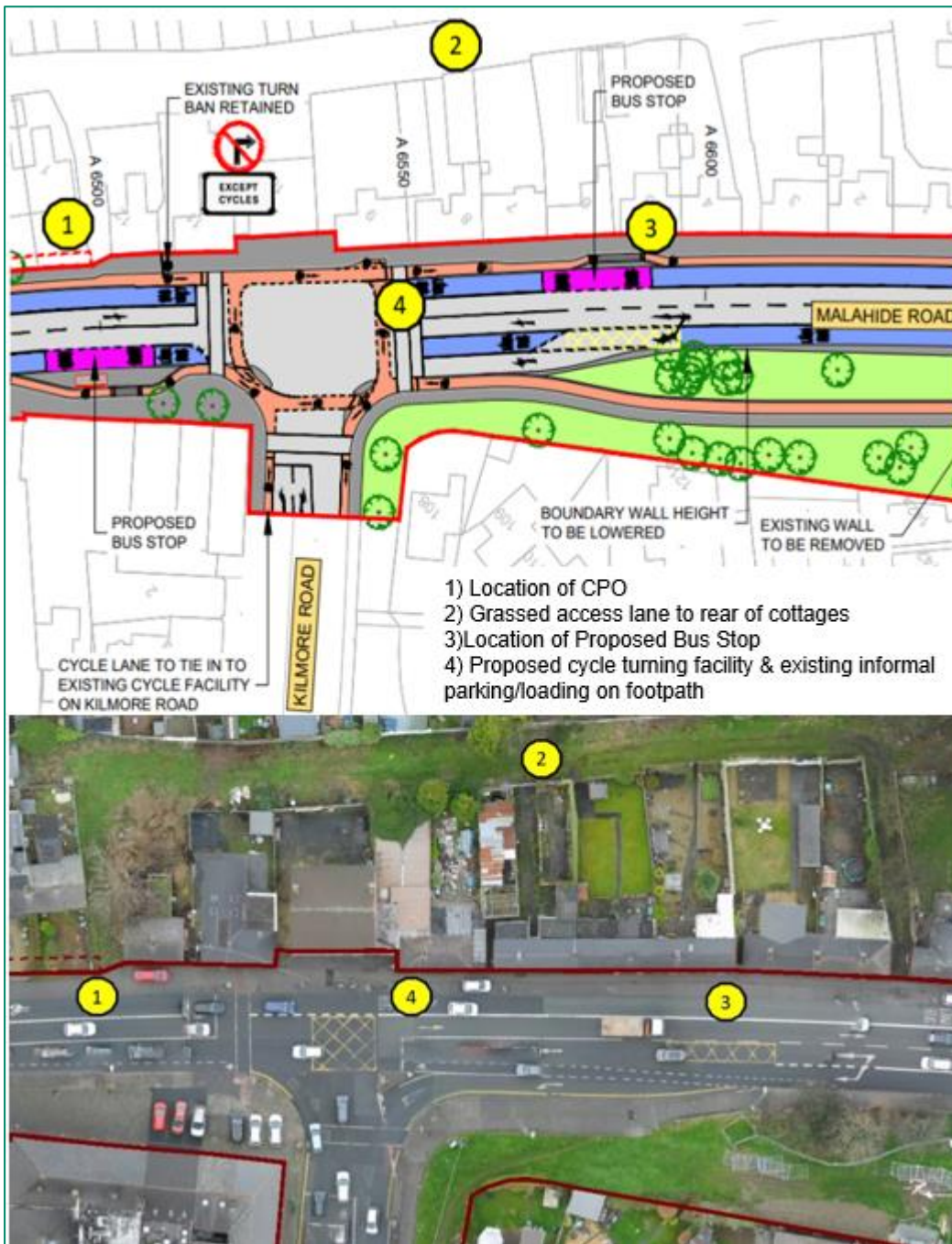


Figure 2.3.1 General Arrangement, Existing Layout and Key Features of Proposed Scheme at Artane Cottages Lower

Further images from Google Street View are provided in Figure 2.3.2, Figure 2.3.3 and Figure 2.3.4.



Figure 2.3.2 Existing Layout looking north (Image Source: Google)



Figure 2.3.3: Existing Layout looking south (Image Source: Google)



Figure 2.3.4: Existing Layout looking north-east (Image Source: Google)

2.3.2 Overview of Submissions

There were four submissions made in relation to the Proposed Scheme at this location.

Table 2.3.1: Submissions Made in Respect of Artane Cottages Lower

No	Name	No	Name
8	Anna Hofheinz & others	66	Cian O'Callaghan TD
14	Aodhan O Riodain TD	83	Sean Haughey TD

Submission no 08 was signed on behalf of the residents of seven properties, being numbers 3, 5, 6, 7, 8, 9 and 11 Artane Cottages Lower. (In addition, it is noted that the same submission was made in each of 9 objections to the CPO by residents of numbers 3, 5, 6, 7, 8 and 11 Artane Cottages Lower, as described in Section 3.2 of this report.)

The other three submissions in relation to the Proposed Scheme were from elected representatives raising some or all of the issues raised by the residents.

Three key issues were raised by the submissions relating to the Proposed Scheme at this location, along with detailed response to these. These 3 key issues raised are:

- i. Bus stop location and impact on the environment;
- ii. Residual Footpath and parking/loading arrangements; and
- iii. Clarifications.

i. Bus stop location and impact on the environment; Summary of issue

This issue was raised by all the 4 submissions in response to the Proposed Scheme; 08, 14, 66 and 83.

- a) The submissions raised an issue with the location of a new inbound bus stop outside Artane Cottages Lower, challenging the rationale for its location in the Proposed Scheme. The submissions also assert that the layout is sub-standard and that a standard bus stop could be provided elsewhere nearby. The submissions provide an alternative suggestion for siting two bus stops, one at 25a-g Malahide Road and one at 276-302 Malahide Road, for consideration.
- b) The submissions raised concerns that BusConnects Design Guidance (provided as EIAR Chapter 4 Proposed Scheme Description Volume 4 Appendix A4.1) contravenes the National Cycle Manual and Irish Wheelchair Association Guidelines and also challenged the residual footpath widths for the Proposed Scheme at this location.
- c) The submissions disagreed with the architectural heritage impact assessment. Concerns were raised that the impact on residential amenity is not reflected anywhere in the EIA and it is not demonstrated how the NTA intends to mitigate against long- term impact.
- d) The submissions also raised issues with the potential impact from air quality and noise due to waiting buses.

It is important to stress that land acquisition is not required for the proposed new bus stop. The lands to be acquired in the CPO are located at the northern access to the grassed lane way serving the rear of Artane Cottages Lower approximately 85m further to the north.

Response to issue

a) New inbound bus stop at this location

The methodology for assessing and refining the locations for the bus stops along the Proposed Scheme has been summarised in Section 4.13 of the Preliminary Design Report, provided as part of the Supplementary Information.

In line with this, the basic criteria considered when locating bus stops are as follows:

- Driver waiting and passengers are clearly visible to each other;
- Located close to key facilities;
- Located close to main junctions without affecting road safety or junction operation;
- Located to minimise walking distance between interchange stops;
- Where there is space for a bus shelter;
- Located in pairs, 'tail to tail' on opposite sides of the road;
- Close to (and on exit side of) pedestrian crossings;
- Away from sites likely to be obstructed; and
- Adequate footway width.

A stand-alone document (Bus Stop Review Methodology) has also been developed to assist in this process and is included as an appendix (Appendix H) to the Preliminary Design Report.

The bus stop locations were reviewed at each stage of the design process with a view to ensuring that the objectives of the Proposed Scheme were met.

Feedback from each of the non-statutory consultations was also considered in reviewing the bus stop locations as part of the design of the scheme. This includes feedback raised at Community Forum meetings, held to foster discussion with local stakeholders, in relation to the design of the Proposed Scheme. At such meetings concerns were raised in relation to the footpath width remaining with the proposed bus stop to be sited adjacent to 5 & 6 Artane Cottages.

In particular, following feedback from the second round of non-statutory public consultation in March 2020, a review was undertaken of all the bus stops along the route using the methodology and criteria referred to above.

As set out in Section 6.4.6.1.1.3 of EIAR Chapter 6 Traffic and Transport the implementation of the Proposed Scheme will result in changes in the quality of bus infrastructure provision along the route, including dedicated bus lanes and bus stop upgrades / relocations. The overall rationale for siting the new inbound bus stop at this location is for it to serve the surrounding catchment, as set out in Table 6.16 of Chapter 6 Appendix A6.1 Traffic Impact Assessment Report, as shown in Figure 2.3.5 below.

Direction	Stop	Chainage	Do Something	Comment
Inbound	1277	A6125	Retained	N/A
Inbound	1219	A6350	Removed	Existing stop removed due to the proximity of the Mornington Grove and the new Kilmore Road stop.
Inbound	-	A6575	New	New stop approximately 30m to the south of Kilmore Road at Chainage 6575 proposed to serve the surrounding catchment.
Inbound	1220	A6725	Removed	Existing stop removed due to the proximity of the Kilmore Road and Elm Mount Road junctions.
Inbound	1221	A7025	Retained	N/A
Inbound	664	A7375	Retained	N/A
Inbound	665	A7675	Retained	N/A

Figure 2.3.5: Overview of Amendments to Bus Stop Locations

On this section of the proposed corridor the removal of the existing bus stop at Stop 1219/Danieli Road and re-locating it to a new one close to Kilmore Road was assessed to be the most appropriate solution for alignment with the bus stop review criteria listed above.

This review was also informed by the future implementation of the Dublin Network Redesign. In particular, it was noted that the existing bus service 104 would no longer be routed via Kilmore Road/Malahide Road under the future bus network routing proposals for the area. Instead, it would be routed along Ardlea Road, thereby leaving the southern end of Kilmore Road without a bus service and no bus stops close by on Malahide Road. The existing bus service routes and proposed bus service routes (Network Redesign Proposals) are set out in Figure 4-2 and Figure 4-3 of the Preferred Route Option Report and shown below in Figure 2.3.6.

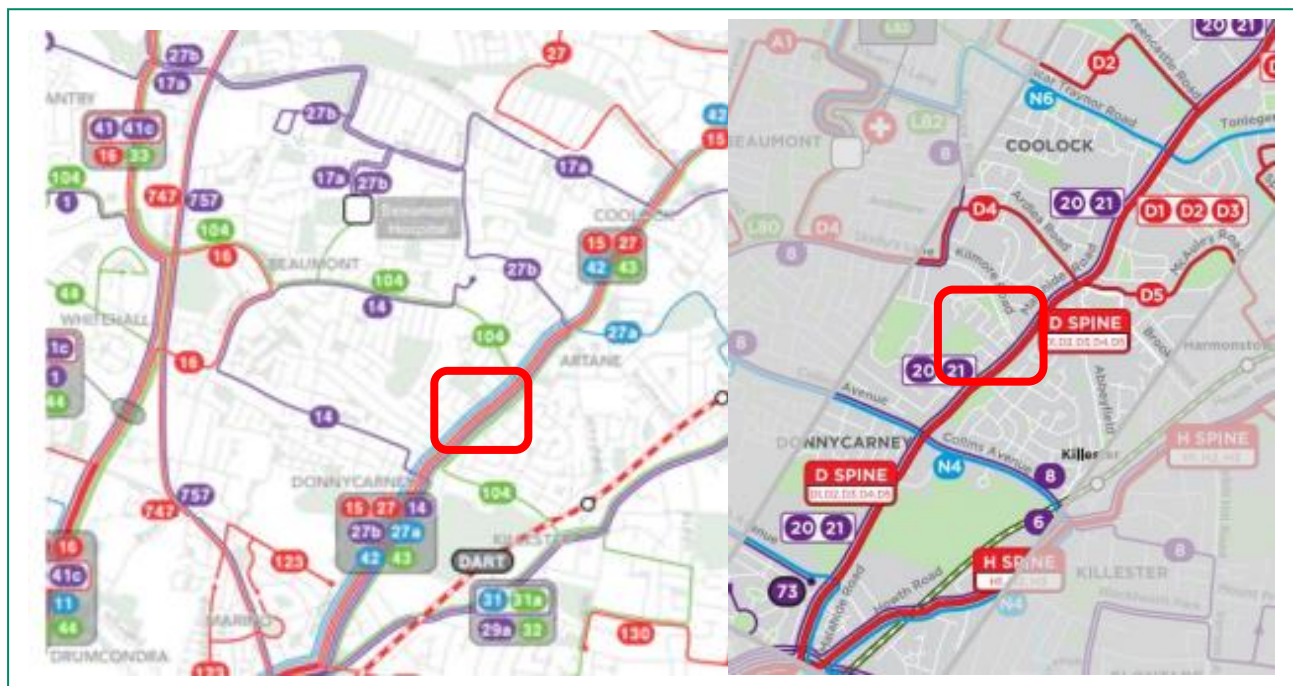


Figure 2.3.6: Existing Bus Service Routing & Future Bus Routing (extracted from Figure 4-2 and Figure 4-3 of the Preferred Route Option Report)

The Proposed Scheme takes account of the proposed network routing adjustment and provides a bus stop at the junction of Malahide Road and Kilmore Road to cater for the Kilmore Road catchment that are currently served by the 104 service. This revised proposal was included in the Updated Draft Preferred Route Option ahead of the third round of non-statutory public consultation in November 2020.

Alternative Proposals by submissions

The submissions included the following proposals for alternative locations for the bus stops:

‘Both at the terrace of commercial properties at 25a-g Malahide Road (stop 1219 previously outside 25G Malahide Road) and at 276 – 302 Malahide Road (stop 1220 previously outside 282/284 Malahide Road), there would be sufficient depth of the footpath/public realm to introduce island bus stops fully in line with the stated preferred NTA bus stop design, refer fig. 7

A revision of bus stop 1219 south by approx. 30-50m to in front of 25a Malahide Road would bring the distance Mornington Grove 1277 to Danieli Road to longer than 250m. In this scenario, stop 1220 could be retained in its current location and all distances southbound would be within the proposed range as at 3.1.

If it was not deemed feasible to retain stops 1219 and 1220, the proposed new stop could be relocated: The footpath widens a mere 65m south of the proposed bus stop, at nos. 302/300 Malahide Road, to approx. 8m deep. The properties here have front gardens in excess of 15m depth, the location would allow for adequate detail of the bus stop (again fully in line with details in fig. 7) and appropriate congregation of space for people waiting for busses. This, possibly in tandem with a

relocation of stop 1277 south towards Danielli Road, would achieve acceptable distances comparable to the proposed'

Summarising the above the submissions have proposed the following 3 scenarios as set out in Figure 2.3.7, Figure 2.3.8 and Figure 2.3.9 below.

Scenario 1: Retain existing bus stop locations at Danielli Road (1219) and Killester Avenue (1220) and avail of the wide footpaths in these areas



Figure 2.3.7: Alternative Bus Stop Proposal Scenario 1 (Image Source: Google)

Scenario 2: Relocate the Danielli Road stop (1219) 30-50m south and retain the Mornington Grove Stop (1277) and Killester Avenue stop (1220) in existing locations



Figure 2.3.8: Alternative Bus Stop Proposal Scenario 2 (Image Source: Google)

Scenario 3: Remove the Danielli Road stop (1219) and the Killester Avenue(1220) stop and provide a new bus stop outside 302/300 Malahide Road using the existing Mornington Grove Stop (1277) or relocate the Mornington Grove Stop (1277) to accommodate a revised spacing arrangement between bus stops.



Figure 2.3.9: Alternative Bus Stop Proposal Scenario 3 (Image Source: Google)

The NTA welcome the understanding from the submissions regarding the importance of spacing of bus stops along the corridor.

Scenario 1 does not perform as well as the Proposed Scheme against the bus stop review criteria. Due to the close proximity of stops, this offers limited benefit for additional catchment area as a result of the overlapping zone of influence and is likely to result in increased delays due to dwell time (boarding/alighting) including speed reduction at each of these stops which could compromise overall journey times for buses along the corridor.

Scenario 2 does provide an improvement from Scenario 1 by rationalising the distances between stops, however this has a less effective catchment area from Kilmore Road by comparison to the Proposed Scheme arrangement which is of particular importance in light of the bus routing change on Kilmore Road as set out in Figure 2.3.6.

Similarly, Scenario 3 does provide an improvement from Scenario 1 by rationalising the distances between stops, however this has a less effective catchment area from Kilmore Road by comparison to the Proposed Scheme arrangement. Both Scenario 2 and Scenario 3 would also need to consider the impacts on the outbound services. As set out above, one of the basic criteria in considering a location for bus stops is locating them in pairs on opposite sides of the road. The Proposed Scheme achieves this using the Kilmore Road junction to provide pedestrian crossing facilities. These bus stops have been specifically located downstream of the Kilmore Road junction to optimise junction interaction for adaptive bus signalling measures resulting in a lower impact on speed and capacity as well as increased safety for passengers (crossing the road behind the bus, facing oncoming traffic).

Thus, relocating the bus stop to 302/300 Malahide Road would potentially require a mid-block pedestrian crossing and modifications to the outbound bus stop location. The other potentially prohibitive challenge for siting the bus stop at 302/300 Malahide Road would be physically installing the bus stop platform between vehicular driveways for properties at this location. The submissions have proposed to use the larger island as per Figure 34 in Appendix A4.1 which notes a 25m typical bus platform length. This arrangement will be very challenging to be accommodated at 302/300 Malahide Road without impacting vehicular access to properties. The location of the bus stop as set out in the Proposed Scheme does not conflict with any existing driveway entrances.

For these reasons, the location of the bus stop in the Proposed Scheme, as shown in Figure 2.1.10, is considered to be the optimum location when assessed against the key bus stop review criteria listed above and deemed to provide better alignment to the scheme objectives.



Figure 2.3.10: Proposed Scheme Bus Stops (Image Source: Google)

b) Bus Stop Design
Pedestrian / Cyclist Conflict

The NTA notes the submissions' comments in relation to the importance for considering the pedestrian/cyclist interaction at bus stops. In Section 11 of EIAR Chapter 4 Proposed Scheme Description Appendix A.4.1 Preliminary Design Guidance Booklet (PDGB) sets out the key measures to address the concerns raised in relation to vulnerable users at these locations which is further elaborated in Section 4.13.2, 4.13.3 of the Preliminary Design Report provided as Supplementary Information. These details have evolved as a result of direct consultation between the NTA and representative mobility groups, accessibility audits and road safety audits.

As described in PDGB Section 11.1 Island Bus Stop, these types are the preferred bus stop option to be used as standard on the CBC project where space constraints allow. Where space constraints do not allow for an island bus stop, as is the case at Artane Cottages Lower, PDGB Section 11.2 Shared Bus Stop Landing Zone provides an option consisting of a shared bus stop landing zone that may be considered. This proposed arrangement will remove the conflict between cyclists and stopping buses by ramping cyclists up to the footpath level where they continue through the stop.

Section 11.2 goes on to explain that to address the pedestrian/cyclist conflict, which would apply to wheelchair users also, the cycle track should be narrowed on approach to the bus stop and yellow bar markings should be provided to alert cyclists to the potential conflict ahead. In addition to this, at the bus stop, the cycle track should be deflected to provide a 1.0m wide boarding/alighting zone for bus passengers, including wheelchair users. Also, appropriate tactile kerbing should be provided to ensure that visually impaired users are aware of crossing areas.

The Shared Bus Stop Landing Zone is the bus stop arrangement at this location and is in accordance with EIAR Chapter 4 Proposed Scheme Description Appendix A.4.1 Preliminary Design Guidance Booklet.

National Cycle Manual

In respect of the comment made in the submissions that the Preliminary Design Guidance Booklet (PDGB), included as EIAR Chapter 4 Proposed Scheme Description Appendix A.4.1, contravenes the National Cycle Manual, as stated in Section 1 of the PDGB its purpose is to provide guidance for the various design teams involved in the CBC Project, to ensure a consistent design approach across the projects. The proposed scale of the BusConnects CBC Infrastructure Works will be transformational for cycling in Dublin, delivering a large number of the primary cycling routes identified in the Greater Dublin Area Cycle Network plan. With proposals of this scale, it is critical that the overall design approach matches the stated ambition, and can achieve a longevity that such investment deserves. With this in mind, the NTA developed for the PDGB for the project to complement existing documents and standards such as the National Cycle Manual and DMURS. The PDGB was developed to outline relevant design principles and to ensure consistency of design.

Documents such as the National Cycle Manual and DMURS continue to serve the engineering and development industry well and over the past 7-10 years, have played an important role in allowing Ireland to follow international best practice. Like all guidance documents, they need to be cognisant of

the everchanging nature of society, including commuting patterns. To acknowledge the expected increase in cycling numbers and to set about achieving the necessary 'step change' to cater for this increase, international best practice from countries which have already experienced this transition successfully was consulted.

In relation to the specific footpath narrowing at the junction to accommodate a right turn hold for the cycle path mentioned by the submissions, Section 5.8 of the PDGB relates to footpath widths, noting that 2.0m is the desirable minimum width for a pedestrian footpath and that this width should be increased in areas catering for significant pedestrian volumes where space permits. DMURS defines the absolute minimum footway width for road sections as 1.8m based on the width required for two wheelchairs to pass each other. At specific pinch points, Building for Everyone: A Universal Design Approach, defines acceptable minimum footpath widths as being 1.2m wide over a 2m length of path. At this specific location the footpath is 1.8m, with the cycle right turn hold pocket 1.5m.

c) Architectural Heritage Assessment

Artane Cottages Lower have been specifically assessed in the EIAR Chapter 16 Architectural Heritage. Section 16.4.4.4. Other Structures of Architectural Heritage Interest of this Chapter identifies 1-12 Artane Cottages Lower as CBC001BTH013. The cottages are a group of 12 no. terraced single-storey 19th-century red brick cottages fronting directly on the footpath. Consultation of Dublin City Development Plan 2016-2022 and draft Dublin City Development Plan 2022-2028 indicates that the cottages are not protected structures nor are they in an Architectural Conservation Area. They are not included in the published National Inventory of Architectural Heritage inventory for Dublin. However, notwithstanding that the group of cottages do not have an architectural heritage designation, the cottages are acknowledged to be of architectural heritage interest.

The architectural heritage assessment considered the factors which contribute to the architectural heritage interest of the cottages, as described on page 30 of Appendix A16.2 Inventory of Architectural Heritage Sites; the cottages comprise terraces of ten surviving single-storey redbrick three-room cottages built c.1800 and while most of the cottages have been altered, and individually they are of local importance, the terraces make a positive contribution to the historic character of the streetscape and are of Regional importance.

Although the cottages have suffered some loss of character, through the replacement of original features, they were assessed in Section 16.3.1.9 of Chapter 16 Architectural Heritage and in Section 2.5.2 of Appendix A16.2 Inventory of Architectural Heritage Sites in Volume 4 of the EIAR as being of Regional architectural heritage interest and Medium sensitivity for their architectural and social interest as well as group value as part of the streetscape of the old village.

Cartographic sources consulted in preparing the EIAR, including William Duncan's Map of 1821 and the first edition Ordnance Survey map which was published in the 1840s indicate that there has been row of terraced cottages in this location since the early to mid 19th century when the area was predominantly rural in character. The present cottages largely replaced the earlier row and are consistent with labourer's cottages built by the Local Authority in late 19th century. They are evident on the 25-inch Ordnance Map published in 1911. Historic maps indicate that the cottages never had gardens to the front but have always fronted directly onto the Malahide Road.

No significant changes are proposed to the alignment of the existing footpath in front of Artane Cottages Lower, however the inclusion of a cycle track under the Proposed Scheme will mean that the cottages will be set further back from the vehicular traffic using the Bus Lane and road carriageway than they are at present. The design of the Proposed Scheme has purposefully only included a bus stop pole and RTPI sign and avoided the placement of a bus shelter at this location, which will minimise impacts on the setting of Artane Cottages Lower.

In Section 16.5.1.3 of Chapter 16, the implementation of mitigation is addressed. It is stated that the other structures of architectural heritage interest identified in Table 16.12 (which includes Artane Cottages Lower) will be subject to 'recording, protection and monitoring of the sensitive fabric prior to and for the duration of the construction phase'. Recording is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor, in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR.

The architectural heritage impact of the bus stop at this location on the Proposed Scheme has been assessed in Section 16.4.4.4 of Chapter 16 and deemed to have a Negative, Slight and Long-term impact as set out below:

1-12 Artane Cottages Lower (CBC0001BTH013) where a new bus-stop is proposed in front of numbers 5 and 6, and cantilevered signals are proposed controlling the junction opposite Number 9. The cottages are of Medium Sensitivity. The proposed new structures will have an adverse visual impact on the setting of the terrace, the magnitude of which is Low. The potential Operational Phase impact is Negative, Slight and Long-Term.

Community Amenity Assessment

The approach to assessing the Community Amenity impact assessment has been described in Section 10.2.4.1.1 of Chapter 10 which considers *the 'indirect' impact of the following environmental effects which may combine to create a change in amenity:*

- Air quality;
- Visual;
- Traffic and transport; and
- Noise and vibration.

In EIAR Chapter 10 Population, the Artane community area (within which Artane Cottages are located), is one of the community areas adjacent to the Proposed Scheme. Figure 10.1 in Volume 3 of the EIAR shows the community study area.

Section 10.4.4.1.1 of Chapter 10 describes the assessment outcomes with respect to the Artane community area and specifically identifies the community amenity impact as Neutral, Not Significant and Long term:

Overall, a Neutral, Not Significant and Long-Term amenity impact is expected on all other community areas (Darndale, Artane, Donnycarney, Marino, Fairview, Clontarf (St Anthony's), Killester, Ardlea and Donaghmede) during the Operational Phase.

d) Air Quality & Noise Assessment

Table 7.36 of EIAR Chapter 7 Air Quality, as shown in Figure 2.3.11 below, provides a summary of the Predicted Operational Phase Impacts for the Proposed Scheme with regard to road traffic impacts on human receptors and the regional air quality impact. The predicted impacts are neutral and long-term and the residual operational phase impacts from the air dispersion modelling assessment is set out in Section 7.6.2 which identifies a neutral impact for the study area.

Assessment Topic	Potential Impact (Pre-Mitigation and Monitoring)	Predicted Impact (Post Mitigation and Monitoring)
Road traffic impacts on local human receptors	Neutral, Long-term	Neutral, Long-term
Road traffic impacts on local ecological receptors	Positive, Slight, Long-term	Positive, Slight, Long-term
Regional air quality	Neutral, Long-term	Neutral, Long-term

Figure 2.3.11: Extract from Table 7.36 of EIAR Chapter 7

Section 7.6.2 describes the Operational Phase residual air quality impacts as a result of the Proposed Scheme. The air dispersion modelling assessment has found that the Proposed Scheme will be neutral overall in the study area. In 2028 and 2043 all receptors will have ambient air quality in compliance with the ambient air quality standards for the Do Something (and Do Minimum) scenario. There are no substantial or moderate adverse effects expected as a result of the Operational Phase of the Proposed Scheme. Therefore, overall it is considered that the residual effects as a result of the Proposed Scheme's operation are neutral and long-term.

With regard to noise impacts, section 9.4.4.3 of EIAR Chapter 9 Noise and Vibration directly assesses the impacts of the new bus stop at Artane Cottages as follows:

'The closest noise sensitive locations (residential dwellings) to these new bus stop locations are close to the existing Malahide Road edge and are exposed to road traffic noise levels typically between 65 and 69dB LAeq,16hr which will dominate noise levels at these locations.'

As discussed in Section 9.4.4.1.1.4, during the proposed year of opening, 2028, the NTA forecast for 94% of the city bus fleet to be electric vehicles (EVs) or hybrid electric vehicles (HEVs). For the design year 2043, the city bus fleet is forecast to be 100% electric. The operation of electric and hybrid buses eliminates ICE noise from buses accelerating, decelerating and idling at bus stops which is the dominant noise source. In addition, the characteristic of noise from electric vehicles is subjectively less intrusive compared to those with ICE's and is masked to a much greater extent by surrounding road traffic.'

The predicted Operational Phase noise impact range as a result of the new bus stops is set out in Table 9.42 of Chapter 9 and summarises as follows for the operational phase impacts:

Negative, slight to moderate, short term to negative, not significant to slight, short term

ii. Residual Footpath and parking/loading arrangements

Summary of issue

This issue was raised by all the 4 submissions in response to the Proposed Scheme; nos 08, 14, 66, 83.

The submissions set out their concerns in relation to the narrowing of the footpath to accommodate the right turn waiting area for cyclists at the Kilmore Road Junction.

The submissions requested improved access to laneway if no designated residents parking is provided and queried how short-term deliveries to properties would be accommodated.

Response to issue

The NTA notes the previous requests from residents at Artane Cottages Lower to retain the existing footpath widths have been examined and implemented within Proposed Scheme insofar as is practicable. The NTA acknowledge that the submissions have welcomed this element of the design development.

As part of this consultation process the design was altered following this request that also resulted in moving the proposed Cycle track and Footpath on the opposite side of the road into the green area adjacent to St. David's Wood. Insofar as is reasonably practicable, the full width of the existing footpath has been maintained apart from isolated locations where it was not practicable to keep the existing approximate 3.5m wide footpath. The two key locations where this occurs is for the waiting area for right turning cyclists at the Kilmore Junction outside 9 Artane Cottages Lower and outside 5 & 6 Artane Cottages Lower where a new bus stop is proposed. It should be noted that at both these locations the majority of the waiting area and bus stop will be at the same level as the footpath, thus the kerb lines within this section will largely be in the same location as the current situation.

It is noted that as a consequence of seeking to maintain the footpath widths, the cycle track widths have been reduced from 2m to 1.5m typically along this section. The running traffic lane will also be set back approximately 1.5m further away from the properties than under the current scenario. The footpath width at the location of the cycle waiting area for right turning cyclists reduces locally to a minimum of 1.8m to accommodate this waiting area. This width is the absolute minimum required in accordance with DMURS, as set out in the PDGB Appendix A4.1 of EIAR Chapter 4 Proposed Scheme Description.

iii. Clarifications

Summary of clarifications

The submissions have requested clarification in relation to the proposed works relating to the following:

- a) Type of gate being proposed at the existing northern access to the grassed laneway where land is being acquired;
- b) Construction detail between the footpath and houses as there are issues with rising damp;
- c) Access arrangements to the existing southern access to the grassed laneway and parking arrangements for the area.

Response

The submissions have requested a condition with any decision on the overall scheme to require formal engagement with relevant resident groups to finalise details along the route. For Artane Cottages Lower the submissions have raised the following 3 points:

- a) Type of gate being proposed at the Northern access where land is being acquired;
- b) Construction detail between the footpath and houses as there are issues with rising damp; and
- c) Access arrangements for the existing Southern access.

Response to clarifications

The NTA notes also the comments raised in relation to engagement with residents during the implementation phase.

Further information in relation to the approach for communicating with members of the public during the construction phase is set out in Chapter 5 Construction Appendix A5.1 CEMP and summarised below:

The NTA will put in place a Communications Plan in conjunction with the appointed contractor. The Plan will provide a mechanism for members of the public to communicate with the NTA, and for the NTA to communicate important information on various aspects of the Proposed Scheme to the public. The Plan will include procedures to inform members of the community directly affected by the Construction Phase on schedules for any activity of a particularly disruptive nature which is likely to impinge on their property such as boundary works, road closures and diversions, and any mitigating actions that are being taken to minimise such disruption.

In response to the three specific points made the NTA make respond as follows:

- a) Type of gate being proposed at the Northern access where land is being acquired

The NTA acknowledge that no formal objection to the CPO has been made in the context of the proposed works associated with the permanent land acquisition (0.1m²) required at the grassed laneway as identified under plot number 1027(2).2a adjacent to 1 Artane Cottages Upper. The following clarification is provided in relation to the proposed works at this location, namely the work is to facilitate relocation of the gate post and re-erection of the existing gates to accommodate the Proposed Scheme cross section.

- b) Construction detail between the footpath and houses as there are issues with rising damp

The NTA notes the comments raised in relation to footpath/building interface details and legacy issues associated with the current footpath construction. Given the existing footpath widths are largely maintained at this location, the proposed works will not adversely impact the legacy issues and challenges associated with drainage, rising damp and sound transfer for these buildings, notwithstanding pre-construction and post construction surveys will be undertaken in line with Section 5.5.2.1 of EIAR Chapter 5 Construction.

- c) Access arrangements for the existing Southern Access

The NTA notes the request for clarification in relation to proposed access to residential parking and acknowledge that the vehicular access to the rear lane is primarily via the southern gate between nos. 3 and 4 Artane Cottages Lower.

The intention under the Proposed Scheme will be to retain the existing access to the driveway at this location and thus not adversely impact these existing arrangements. Specific detail/landowner requirements associated with accommodation works will be discussed with individual landowners.

2.4 Other Specific Locations

2.4.1 Overview of Submissions

Three other locations were identified by submissions made in response to the Proposed Scheme are:

- 24 Donnycarney Community Association – matters of detail pertaining to Donnycarney;
- 56 Tesco Ireland Limited – matters of detail relating to the junction for Clarehall Shopping Centre;
- 70 Denise Mitchell TD and Others – objecting to the use of part of Buttercup Park as a construction compound, as well as raising issues with respect to Ayrfield Drive.

2.4.2 24 – Donnycarney West Community Association (DWCA)

Overview of Submission

The submission states that it is made on behalf of the members of the DWCA and refers to the section of the Proposed Scheme shown on Sheets 16, 17 and 18 of the General Arrangement drawings and Landscape drawings.

The submission makes the following comments:

- i. Measures should be included to reduce traffic speeds along the route;
- ii. Provide sufficient crossing times and sequencing of pedestrian lights;
- iii. Disquiet about relocation of outbound bus stop 672 which is less convenient for residents of Donnycarney Road and Belton Park Road;
- iv. Concern about an area of grass and trees shown in front of 109 Malahide Road (four shops);
- v. Removal of Eir advertising unit close to junction of Donnycarney Road as it will impede pedestrians with the narrowing of the footpath;
- vi. Five flower basket poles to the front of the shops to be retained;
- vii. Support the retention of Donnycarney Clock;
- viii. Welcome the additional tree planting and request community funded feature (area sign, seating, planted areas) be retained;
- ix. Welcome the urban space in front of the church and request new public seats; and
- x. Recommend engagement with the OPW who manage the Casino Marino, including relocation of telecoms cabinet.

Response to submission

- i. Measures should be included to reduce traffic speeds along the route;

As set out in Section 6.3.3.4 of the EIAR Chapter 6 Traffic and Transport, the existing speed limit on this section of the Malahide Road is 50km/h. The Proposed Scheme does not include any changes to this existing speed limit and no safety concerns relating to traffic speed have been identified during the design and road safety audits.

- ii. Provide sufficient crossing times and sequencing of pedestrian lights;

Section 4.6.7 of EIAR Chapter 4 Proposed Scheme Description states the following; ‘The design and modelling of junctions has been an iterative process to optimise the number of people (rather than vehicles) that can pass through each junction, with priority given to pedestrian, cycle, and bus movements. The design for each junction within the Proposed Scheme was developed to meet the underlying objectives of the Proposed Scheme. Junctions have been designed to ensure a high level

of comfort and priority for sustainable modes of travel e.g., walking, cycling and public transport, by prioritising the space and time allocated to these modes within the operation of a junction, and subsequently to accommodate the forecasted future year traffic volumes as safely and efficiently as possible within the remaining space and time. This has allowed the design to maximise the number of people moving through each junction and to prioritise these sustainable modes of travel'.

Sufficient crossing times and sequencing of pedestrians have been incorporated into the design of all junctions.

iii. **Disquiet about relocation of outbound bus stop 672 which is less convenient for residents of Donnycarney Road and Belton Park Road**

Section 4.6.4.5 of the EIAR Chapter 4 Proposed Scheme Description sets out how 'the position and number of bus stops has been evaluated as part of a bus stop assessment.

- *The criteria that are considered when locating a bus stop are as follows:*
- *Driver and waiting Passengers are clearly visible to each other;*
- *Location close to key facilities;*
- *Location close to main junctions without affecting road safety or junction operation;*
- *Location to minimise walking distance between bus interchange stops;*
- *Where ideally there is space for a bus shelter;*
- *Location in pairs, 'Tail to Tail' opposite sides of the road;*
- *Close to (and on exit side of) pedestrian crossings;*
- *Away from sites likely to be obstructed; and*
- *Adequate footpath width'*

Appendix H of the Preliminary Design Report, provided in the Supplementary Information for the Proposed Scheme application, provides details of the bus stop review analysis. On page 6 of this appendix the following design rationale is provided:

- *South of Casino Park Junction - New stop proposed at Casino Park to cater for the surrounding residential catchment. Stop is located adjacent to a controlled pedestrian crossing at the Casino Park Junction.*
- *Donnycarney Road - Existing stop to be removed, due to the proximity of the (new) Casino Park stop and also the existing Donnycarney Church stop.*

iv. **Concern about an area of grass and trees shown in front of 109 Malahide Road (four shops);**

The General Arrangement and Landscaping Drawings included as Figures 2 and 5 of Volume 3 of the EIAR Chapter 4 Proposed Scheme Description show a green area between the shops in question and the footway, whereas the design intent at this location is for the footway to extend to the front of the four shops located at 109-115 Malahide Road, as clarified in Figure 2.4.1 below.

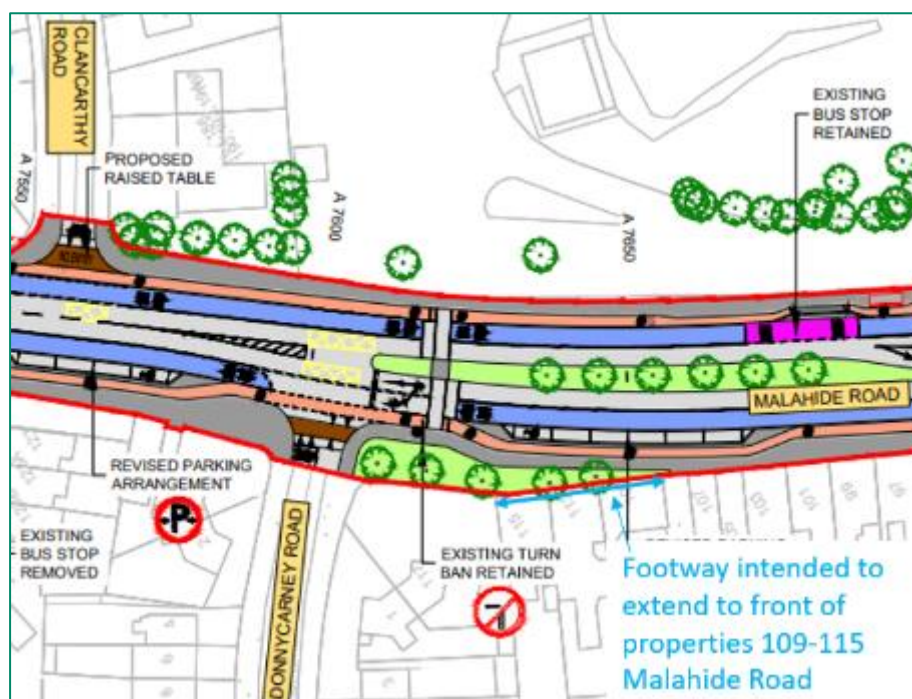


Figure 2.4.1: Extract of General Arrangement Sheet 18

- v. Removal of Eir advertising unit close to junction of Donnycarney Road as it will impede pedestrians with the narrowing of the footpath;

The existing Eir public telephone / advertising board is retained in its existing location in the Proposed Scheme and will be adjacent to, but clear of, the proposed footway. The proposed footway width at this location is approximately 2.5m and exceeds the minimum recommended width of 2.0m as recommended in Section 5.8 of the EIA Chapter 4 Proposed Scheme Description Appendix A4.1 Preliminary Design Guidance Booklet.

- vi. Five flower basket poles to the front of the shops to be retained;

It is intended that the flower basket poles will be retained as part of the landscaping proposals for the proposed Scheme as shown on the drawings in EIA Volume 3 Chapter 4 Proposed Scheme Description Figures - Landscaping General Arrangement.

- vii. Support the retention of Donnycarney Clock;

The support for the retention of the clock is noted and the clock is being retained in the Proposed Scheme.

- viii. Welcome the additional tree planting and request community funded feature (area sign, seating, planted areas) be retained;

It is intended that the area sign, public seating and planted area funded by the community will be retained as part of the landscaping proposals for the proposed Scheme as shown on the drawings in EIA Volume 3 Chapter 4 Proposed Scheme Description Figures - Landscaping General Arrangement.

- ix. Welcome the urban space in front of the church and request new public seats;

The support for the improved urban space to the front of Donnycarney Church is noted.

Image 4.6 on page 17 of the EIA Chapter 4 Proposed Scheme Description shows the design intent at this location, including low walls to provide informal seating, see Figure 2.4.2 below.



Figure 2.4.2: Image 4.6 of EIAR Chapter 4

- x. Recommend engagement with the OPW who manage the Casino Marino, including relocation of telecoms cabinet.

The entrance to Casino Marino and grassed area to the front of it are outside the extents of the Proposed Scheme.

2.4.3 56 – Tesco Ireland Limited

Overview of Submission

The submission welcomes the proposed investment and expresses the view that the wider BusConnects scheme will greatly improve the way in which Dublin City functions. In respect of the Proposed Scheme, it makes two observations relating to:

- i) cyclist safety; and
- ii) highway capacity at the junction between the Malahide Road and the Clarehall Shopping Centre.

i) Cyclist Safety

Summary of issue raised

The submission requests that when HGV's are turning left to access the Clarehall Shopping Centre that all cyclist are held at the red light due to a potential lack of visibility of a cyclist, even when in the segregated lane. The submission states *'The Bus Connect team are asked to demonstrate that the swept path of an approaching HGV can turn from the Malahide Road into Clarehall Shopping Centre while maintain its lane and note the potential oversailing of the kerbs provided for cyclists' protection.'*

Response to issue raised

Table 4.4 of EIAR Chapter 4 Proposed Scheme Description identifies this junction as a Major Junction. The Proposed Scheme layout at this junction is shown in EIAR Volume 3 Chapter 4 Proposed Scheme Descriptions Figures and an extract from the General Arrangement drawing is shown in Figure 2.4.3 below.



Figure 2.4.3: Extract of General Arrangement for Malahide Road / Clarehall Shopping Centre Junction

As shown in Figure above, general traffic wishing to enter the shopping centre is catered for by a dedicated left turn pocket. The layout is a Type 2 Protected Junction for Cyclists as set out in EIAR Chapter 4 Proposed Scheme Description Appendix A4.1 Preliminary Design Guidance Booklet. The specific key design features relating to this type of junction are described on page 9 of this Appendix specifically:

'Kerbed corner islands should be provided to force turning vehicles into a wide turn and remove the risk of vehicles cutting into the cycle route at the junction corner which has been the cause of serious accidents in various places. These raised islands create a protected ring for cyclists navigating the junction, improving safety for right turning cyclists. This is the most significant new safety feature that is being introduced as part of the BusConnects programme.'

EIAR Chapter 6 Traffic & Transport Appendix A6.3 Junction Design Report provides details of the design development and assessment of the proposed junction, being junction no 3. Page 19 of Appendix A6.3 shows that the indicative method of control allows left turning cyclists and left turning general traffic to enter the shopping centre in the same stage of the traffic signals. As shown in Figure above kerbed corner islands are provided thereby forcing turning vehicles into a wide turn and removing the risk of vehicles cutting into the cycle route at the junction corner.

In addition, the existing lane arrangement on the entrance to the shopping centre will remain unaltered by the Proposed Scheme. As shown in seen in Figure 2.4.4 below the right hand lane is designated for "Goods In" and HGV traffic will turn in to this lane. This will increase the separation between the HGVs and cyclists further.



Figure 2.4.4: Existing Lane Arrangement on entrance to Clarehall Shopping Centre (Image Source: Google)

As part of the design development process swept path analyses have been undertaken at all junctions in the Proposed Scheme including this one. Figure 2.4.5 below shows the specific swept path analysis for the HGV movement mentioned in the submission, ie an approaching HGV turning from the Malahide Road into Clarehall Shopping Centre.

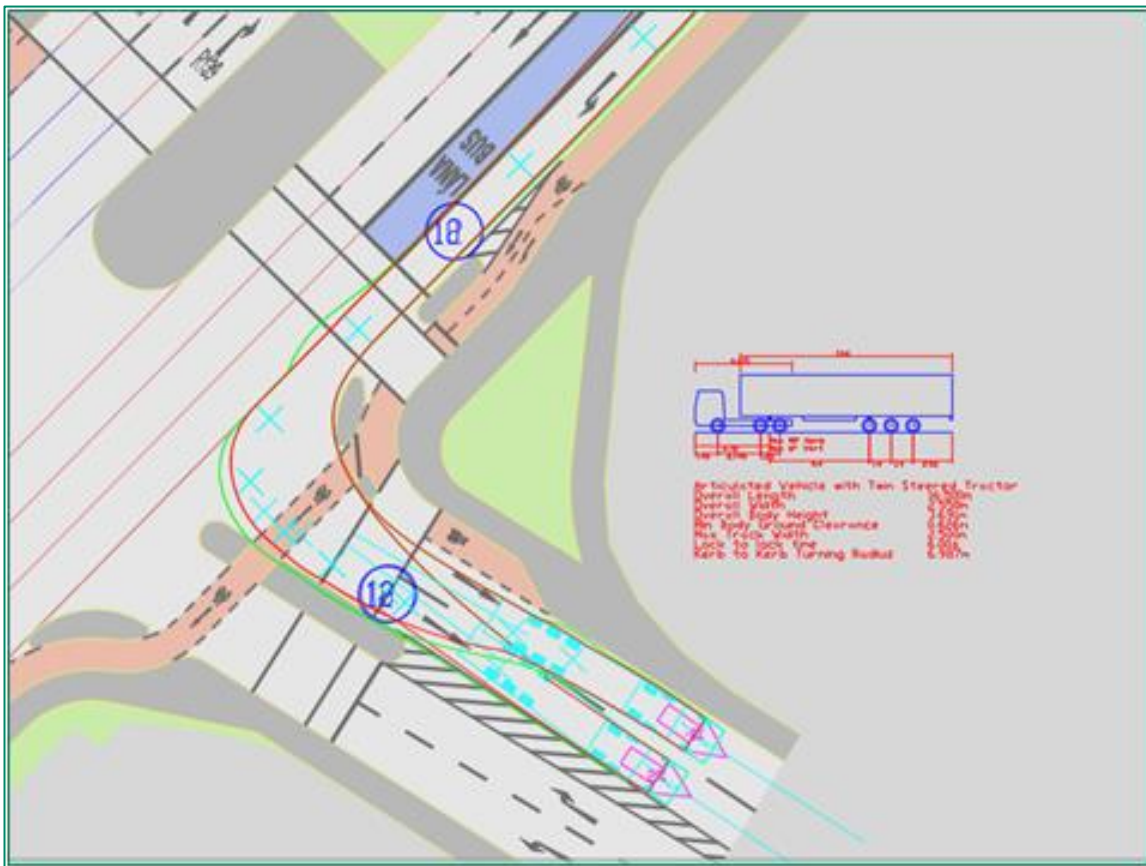


Figure 2.4.5: Swept path analysis for entrance to Clarehall shopping centre

ii) Highway capacity at the junction between the Malahide Road and the Clarehall Shopping Centre.

Summary of issue raised

The submission queries the PRC (Practical Reserve Capacity) values of the proposed junction, citing anecdotal reports from centre management of significant queuing at retail peak periods. The submission also questions what calibration was used to determine the accuracy of the model.

Response to issue raised

Calibration and Validation

Section 6.2.3 of EIAR Chapter 6 Traffic & Transport summarises the various transport modelling tools that have been developed and used to inform the preparation of the Traffic Impact Assessment. Further detail on the transport model development process, the traffic data inputs used, the calibration, validation and forecast model development for the suite of transport models is provided in Appendix A6.2 Transport Modelling Report and Appendix A6.3 Junction Design Report in Volume 4 of the EIAR.

Section 6.4 of Appendix A6.2 Transport Modelling Report describes the Local Area Model (LAM) Calibration and Validation Criteria when compared to 2019/2020 traffic characteristics. Section 6.5 describes the Full LAM Model Calibration and Validation and Section 6.6.5 Summary states:

'The summary of the performance of the LAM in the vicinity of the Proposed Scheme route is detailed below:

- The LAM calibrates and validates well against link counts along the route of the proposed scheme for all time periods.
- The LAM calibrates and validates well against turning counts for all time periods.
- The modelled journey times from the LAM in the vicinity of the Proposed Scheme is representative of observed journey times, with the cumulative journey time profiles matching well for all time periods.

Junction Capacity

Pages 19 and 20 of Appendix A6.3 Junction Design Report in Volume 4 of the EIAR, provide the PRC values that are quoted in the submission, being 135.3% (AM) and 96.3% (PM). As stated on pages 19 and 20 these values are the junction modelling results for the Proposed Scheme for the 'DS2028' model, being the Do Something scenario in 2028. Section 8.2 of Appendix A6.2 Transport Modelling Report defines 2028 as the 'Opening Year' and defines the Do Something scenario as:

'Do Something' – The 'Do Something' scenario represents the likely traffic and transport conditions of the direct and indirect study areas including for any transportation schemes which have taken place, been approved or are planned for implementation, with the Proposed Scheme in place (i.e. the Do Minimum scenario with the addition of the Proposed Scheme).

It is therefore not appropriate to attempt to directly compare the existing situation with the 2028 Do Something scenario modelling results, given the fundamental changes to the junction layout and the different traffic and transport conditions that will prevail in 2028.

2.4.4 70 – Denise Mitchell TD & Others

Overview of Submission

This submission relates to two locations:

- i. Ayrfield Drive; and
- ii. Buttercup Park

i. Ayrfield Drive

Overview of this part of the submission

This part of the submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space;
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor;

Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

ii. Buttercup Park

Overview of this part of the submission

This part of the submission objects to the use of the green area in Darndale at the corner of Priorswood Road and Malahide Road as a temporary construction compound.

Response to submission

The land in question is included in the permanent land acquisition to facilitate the provision of continuous footpaths and cycle ways through this area. The temporary land acquisition is to provide construction working room and the provision of a contractor's site compound.

As described in EIAR, Chapter 4, Proposed Scheme Description, Section 4.5.1.7 Landscape and Public Realm, *'Following completion of the Proposed Scheme the Construction Compound will be turned into a community greenspace enclosed with hedge planting and woodland walkways. A new pedestrian footpath has been incorporated into the design of the reinstated greenspace to allow for access'*. These proposals are shown in Figure 2.4.6 below, which shows an extract from the Landscaping General Arrangement drawings included in the EIAR Volume Chapter 4 Proposed Scheme Description Figures.

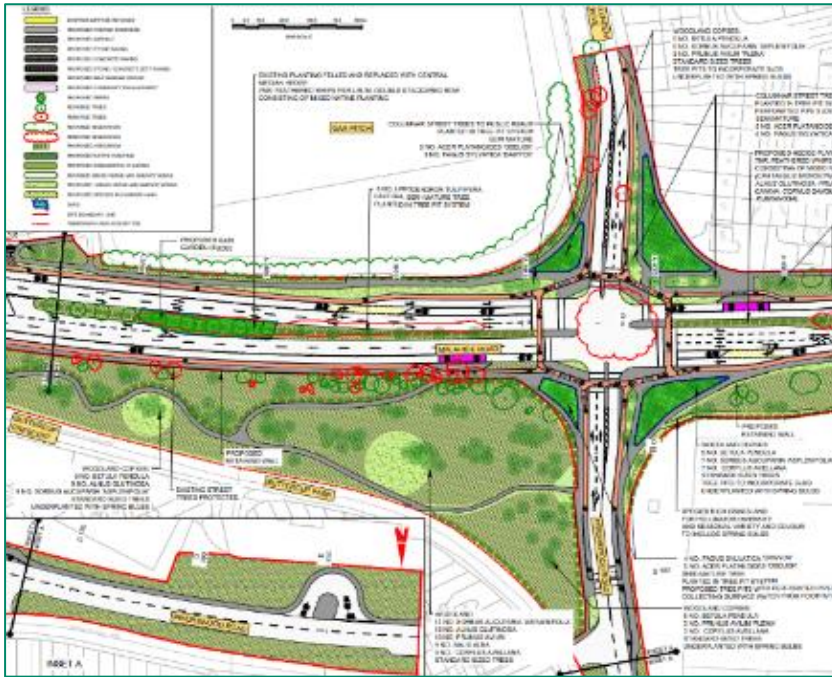


Figure 2.4.6; Extract from Landscape General Arrangement Drawings

As described in Section 5.7.1 of the EIAR Chapter 5 Construction, 'The Construction Compound location has been selected due to the amount of available space at this location, its location near the majority of the Proposed Scheme major works and its access to the National and Regional Road Network. Refer to Chapter 6 (Traffic & Transport) of this EIAR for an assessment of the construction traffic.' Figure 2.4.7 below shows the indicative layout of the construction compound.



Figure 2.4.7: Extract of Image 5.1 of EIAR Chapter 5 Construction

2.5 Whole Scheme

2.5.1 Overview of Submissions

The nine submissions relating to the whole scheme are listed below and detailed in the following sub-sections:

- 02 Dun Laoghaire Rathdown County Council
- 03 Brendan Heneghan
- 10 Transport Infrastructure Ireland
- 43 Dublin Community Coalition
- 59 Dublin Cycling Campaign
- 71 Development Applications Unit
- 73 Inland Fisheries Ireland
- 74 Irish Water
- 95 Dublin City Council

2.5.2 02 – Dun Laoghaire Rathdown County Council

Overview of submission

The submission stated that while the Proposed Scheme falls outside the jurisdiction of Dun Laoghaire-Rathdown County Council, the Planning Authority wish to support any improvements in the Bus network in the Dublin Metropolitan Area. It also notes that Policy Objective T6 of the County plan supports the implementation of the bus network measures in the NTA's Greater Dublin Area Transport Strategy 2016-2035.

Response to submission

The support for the scheme is noted and welcomed by the NTA.

2.5.3 03 – Brendan Heneghan

Overview of Submission

This submission raised the following issues:

- i) Consultation Process - Aarhus Convention / Kazakhstan Advice
- ii) Completely different scheme to that consulted on
- iii) Lack of clarity of the works proposed to be carried out
- iv) Consultation with persons on roads identified as affected by traffic report
- v) Adequacy of site notices erected
- vi) Fees charged
- vii) Technical issues
 - a. Removal of roundabouts
 - b. Removal of left turn slips
 - c. Off road cycle tracks
 - d. Trees
 - e. Construction Phasing
 - f. Bus journey times
 - g. Extents of CPO

i. Consultation Process - Aarhus Convention / Kazakhstan Advice

Summary of issue

The submission considers that the consultation on the Proposed Scheme was inadequate at all stages of the development of the proposal and that the NTA largely ignored the principles of the Aarhus Convention on effective public participation. It also expresses the view that no opportunity was afforded to those who are not computer literate (by a toll free number) to participate in any aspect of Phase 2 or Phase 3, which is in breach of paragraph 49 and 50 of the Kazakhstan Advice. It goes on to cite other potential breaches under paragraphs 29, 33, 38, 45, 46, 23, 26, 34 and 57 of the Kazakhstan Advice. It makes the request that a further consultation is undertaken with Kazakhstan principles being observed.

Response to issue

Ireland ratified the Aarhus Convention in June 2012 and it entered into force in Ireland in September 2012. Prior to that ratification, Ireland had to ensure that all the provisions of the Convention were implemented in national law, which took a number of years, and involved over 60 pieces of legislation.

Accordingly, Ireland's obligations under the Aarhus Convention have been fully incorporated into Irish legislation and include rights of access to information on the environment, rights of participation in planning determinations, rights of access to adequate review procedures and various other rights.

These are now statutory provisions, which are binding on all applicable parties.

In relation to transport infrastructure projects, the applicable statutory provisions are set out in the relevant planning and transport legislation, which include requiring major projects to seek planning consent from An Bord Pleanála. Those application processes for large infrastructure schemes provide for a statutory process requiring the making available for public review all of the applicable information set out in the legislation, and permitting the making of submissions in relation to the proposals to the determining body, being An Bord Pleanála. Thereafter, the legislation provides for the holding of an Oral Hearing, enabling direct public engagement and participation in the decision making process.

It should be noted that the advice sought by the Republic of Kazakhstan from the Aarhus Convention Compliance Committee related to the holding of "*public hearings*". The term "*public hearing*" is the equivalent of the "Oral Hearing" process conducted by An Bord Pleanála here in Ireland. This Oral Hearing arrangement is part of the statutory process set out in Irish legislation in fulfilment of its obligations under the Aarhus Convention.

In relation to the three phases of non-statutory consultation referred to in the submission, at that time the Proposed Scheme had not yet progressed to the stage of a planning application to An Bord Pleanála. Instead, the Proposed Scheme was still at the stage of considering various scheme options before finalising a proposal that would then be brought forward for consideration of development consent. As part of the scheme development stage, various non-statutory public consultation processes have been undertaken. These processes are in excess of the requirements of the Aarhus Convention, whose obligations are already enshrined in Irish legislation including “statutory public consultations” which is the stage that the project has now reached.

While, as mentioned above, the Kazakhstan Advice does not apply to the non-statutory public consultation, every effort was made by the NTA to facilitate public participation and engagement during government restrictions relating to the Covid-19 pandemic. A second round of non-statutory public consultation was launched on 4 March 2020 but shortly thereafter due to the Covid-19 pandemic and the various government restrictions, all events forming part of this second round of non-statutory public consultation scheduled after 12 March 2020 were cancelled. However, as the NTA had already received some written submissions by that date, the decision was made not to close the consultation entirely but instead to allow written submissions to continue to be made up until 17 April 2020 which was the original deadline for such submissions.

To further facilitate public engagement and participation, a third round of non-statutory public consultation took place from 4 November 2020 to 16 December 2020. With the continuing effect of the Covid-19 pandemic and associated government restrictions, the third round of non-statutory public consultation was held largely virtually.

ii. Completely different scheme to that consulted on

Summary of Issue

The submission notes that the Proposed Scheme starts at the Mayne River Avenue / Malahide Road junction, whereas throughout the public consultation process it commenced at Clongriffin Dart station and expresses the view that people could well have an entirely different view on the scheme with its length cut considerably.

Response to issue

The rationale for the omission of the section of the Emerging Preferred Route along Belmayne Main Street and Belmayne Avenue is explained in the Executive Summary of the Preferred Route Option Report provided in the Supplementary Information. This sets out that this change was made as there is already a dedicated bus lane and cycling facilities along this section between Clongriffin Dart Station and Hole in the Wall Junction on Main Street, Clongriffin. Between Hole in the Wall Junction and Malahide Road DCC is progressing the Belmayne Main Street and Belmayne Avenue Scheme which includes dedicated bus lane and cycling facilities.

Section 4.2 of EIAR Volume 2 Chapter 4, Proposed Scheme Description, explains that works previously proposed along Belmayne Main Street and Belmayne Avenue are now being undertaken as a separate project being developed by DCC namely, The Belmayne Main Street and Belmayne Avenue Scheme, which provides bus and cycle linkages to Clongriffin Dart Station.

iii. Lack of clarity of the works proposed to be carried out

Summary of Issue

The submission asserts that the works to be carried out as part of the Proposed Scheme are unclear, specifically that a short readable document setting out what is intended should have been submitted.

Response to issue

Volume 1 of the EIAR comprises the Non-Technical Summary of the EIAR for the Proposed Scheme. Section 6 the Non-Technical Summary provides an overview of the description of the Proposed Scheme. Section 7 of the Non-Technical Summary provides a summary of the construction works envisaged and provides a list of 9 activities under the sub-heading of Site Preparation and Clearance

Works, and 9 further activities under the sub-heading of Road and Street Upgrades. General Arrangement drawings are also provided as part of the Non-Technical Summary.

EIAR Volume 2 Chapter 4, Proposed Scheme Description, provides full details of the proposed works for all the various component elements of the Proposed Scheme, with comprehensive engineering drawings provided in EIAR Volume 3 Figures for Chapter 4. These engineering drawings cover 17 different elements of the works, see Figure 2.5.1 below.

Environmental Impact Assessment Report (EIAR) Volume 3 of 4	
Table of Contents - Volume 3	
Figure Number	Title
Chapter 4: Proposed Scheme Description	
BCIDA-ACM-SPW_ZZ-0001_XX_00-DR-CR-9001	Site Location Plan
BCIDA-ACM-GEO_GA-0001_XX_00-DR-CR-9001	General Arrangement
BCIDA-ACM-GEO_HV-0001_ML_00-DR-CR-9001	Mainline Plan and Profile
BCIDA-ACM-GEO_CS-0001_XX_00-DR-CR-9001	Typical Cross Sections
BCIDA-ACM-ENV_LA-0001_XX_00-DR-LL-9001	Landscaping General Arrangement
BCIDA-ACM-PAV_PV-0001_XX_00-DR-CR-9001	Pavement Treatment Plans
BCIDA-ACM-SPW_BW-0001_XX_00-DR-CR-9001	Fencing and Boundary Treatment
BCIDA-ACM-TSM_GA-0001_XX_00-DR-CR-9001	Traffic Signs and Road Markings
BCIDA-ACM-LHT_RL-0001_XX_00-DR-EO-9001	Street Lighting
BCIDA-ACM-TSM_SJ-0001_XX_00-DR-TR-9001	Junction System Design
BCIDA-ACM-DNG_RD-0001_XX_00-DR-CD-9001	Proposed Surface Water Drainage Works
BCIDA-ACM-UTL_UD-0001_XX_00-DR-CU-9001	IW Foul Sewer Asset Alterations
BCIDA-ACM-UTL_UE-0001_XX_00-DR-CU-9001	ESB Asset Alterations
BCIDA-ACM-UTL_UG-0001_XX_00-DR-CU-9001	GNI Asset Alterations
BCIDA-ACM-UTL_UW-0001_XX_00-DR-CU-9001	IW Water Asset Alterations
BCIDA-ACM-UTL_UL-0001_XX_00-DR-CU-9001	Telecommunications Asset Alterations
BCIDA-ACM-UTL_UC-0001_XX_00-DR-CU-9001	Combined Existing Utility Records

Figure 2.5.1: Extract from EIAR Volume 3 table of Contents

The Non-Technical Summary provides a very clear indication of what works are to be carried out and Chapter 4, together with the Chapter 4 Figures in Volume 3, provide clear and detailed information of all aspects of the proposed works.

iv. Consultation with persons on roads identified as affected by traffic report

Summary of Issue

The submission states that Chapter 6 of the EIAR identifies a number of road links which will have a material increase in traffic as a result of the Proposed Scheme, although no clear statements are made about the impact, and notes that the residents of these roads have not been notified of this impact. It also states that it is unclear if the traffic figures include the cumulative effect of the Swords to City Centre CBC Scheme.

Response to issue

As set out in EIAR Chapter 6 Traffic and Transport, Section 6.4.6.2.8 General Traffic Assessment, the transport modelling undertaken for the assessment of the Proposed Scheme has considered the potential for traffic redistribution impacts resulting from the Proposed Scheme measures. This identifies potential decreases as well as increases in traffic flows on some road links in the study area as a result of the Proposed Scheme, due to the reallocation and rebalancing of road space in favour of sustainable modes (Walking, Cycling and Public Transport).

To determine the impact that the Proposed Scheme has in terms of an increase in general traffic flows on the direct and indirect study areas, a robust assessment has been undertaken, with reference to TII's "Traffic and Transport Assessment Guidelines (May 2014)". Each road link that is predicted, through the modelling, to experience an increase in 2-way flows of more than 100 passenger car units

has been subjected to further assessment to assess the significance of effects in relation to the traffic flow changes on these links.

Section 6.4.6.2.8.5 General Traffic Impact Assessment of Chapter 6 outlines the 3-step assessment process that has been undertaken to assess the impact and significance of effect at each junction along the identified links that are predicted to experience traffic flow increases. Tables 6.52 to 6.55 outline the results of this assessment which shows that the majority of assessed junctions have V / C ratios of below 85%, i.e. they are operating within capacity for all assessed years in the Do Minimum and Do Something scenarios (i.e. with and without the Proposed Scheme). The assessment indicates that these junctions will be able to accommodate any changes in traffic volumes, as a result of the Proposed Scheme. The effects at each junction are predominantly deemed to be Imperceptible to Not Significant and Long-term. Given that the redistributed traffic will not lead to a significant deterioration of the operational capacity on the surrounding road network, no additional mitigation measures, beyond what is included already in the design, have been considered.

Accordingly, across the study area as a whole, it is determined that there will be an overall Negative, Slight and Long-term effect from the redistribution of general traffic as a result of the Proposed Scheme. This impact is considered acceptable in line with the Proposed Scheme objectives and the considerable improvements and priority provided for sustainable modes along the Proposed Scheme. The traffic congestion outlined in the impact assessment is considered acceptable when considering the urban location of the area and in the context of the increased movement of people overall and by sustainable modes along the Proposed Scheme.

In respect of the cumulative effect of the Swords to City Centre CBC Scheme, the assessment presented in EIAR Chapter 6 Traffic and Transport is based on the Proposed Scheme only. Consideration of cumulative impacts with other proposed projects is included in EIAR Chapter 21 Cumulative Impacts and Environmental Interactions.

Section 21.2.7 of Chapter 21 sets out that for the operational cumulative effects including the Proposed Scheme, the assessment has been undertaken based on a scenario where all the other 11 Core Bus Corridor schemes are also operational. It is the NTA's intention that all BusConnects Core Bus Corridor schemes would be completed by 2028, therefore the scenario is considered to be reasonable. In addition, it is the largest scale option and therefore represents a reasonable worst case for operational effects in terms of redistribution of traffic and traffic related effects.

The Do Minimum scenarios (in both 2028 and 2043) include all other elements of the BusConnects Programme (apart from the Core Bus Corridor Infrastructure Works elements) i.e. the new BusConnects routes and services (as part of the revised Dublin Area bus network), new bus fleet, the Next Generation Ticketing and integrated fare structure proposals are included in the Do Minimum scenarios. In 2028, other notable Do Minimum transport schemes include; the roll out of the DART+ Programme, Luas Green Line capacity enhancement and the Greater Dublin Area Cycle Network Plan implementation (excluding BusConnects Core Bus Corridor elements). As outlined above, the 2043 Do Minimum scenario assumes the full implementation of the GDA Strategy schemes and so assumes that proposed major transport schemes such as MetroLink, DART+ Tunnel, Luas line extensions to Lucan, Finglas and Bray are all fully operational. Chapter 6 Appendix A6.2 Transport Modelling Report in Volume 4 of the EIAR, provides further information on the modelling assumptions contained within the Do Minimum scenario including the full list of transport schemes included.

v. Adequacy of site notices erected

Summary of issue

The submission queries the adequacy of the number of site notices erected, being wholly along the Malahide Road corridor.

Response to issue

All the required statutory notices were issued for the application for the Proposed Scheme and the CPO. Non-statutory site notices relating to the CPO were erected at a total of 25 locations along the route of the Proposed Scheme, supplementing the statutory notices for the CPO.

vi. Fees charged

Summary of issue

The submission cites the €50 fee for a submission to ABP and substantial fees payable for hard copies of essential documents.

Response to issue

The fees payable for observations / submissions are determined by An Bord Pleanála, as allowed by Section 144 of the Planning and Development Act 2000, as amended.

Section 38 of the Planning and Development Act 2000 provides that certain documents relating to planning applications shall be made available for inspection and purchase by members of the public. The Act does not prescribe fees for copying the relevant documents and the only reference in the Act to the fee to be charged for such a service is contained in section 38(4) which states: "*(4) Copies of the documents under this section shall be made available for purchase on payment of a specified fee not exceeding the reasonable cost of making such a copy.*" The fees payable for obtaining hard copies of the various EIAR documents for the Proposed Scheme have been determined by the NTA and do not exceed the reasonable cost of making a copy of the EIAR documents.

vii. Technical issues raised

Overview of technical issues

a. Removal of roundabouts

The submission notes the removal of two roundabout with traffic signal controlled junctions and notes that no responses have been made to submissions made during the consultation process. The statement is made that roundabouts can be a very efficient distributor of traffic in a way that traffic signals cannot match, the submission expresses the view that the removal of the roundabouts is not essential to the scheme working and suggests that the roundabouts are retained.

b. Removal of left turn slips

The submission queries the removal of left turn slip lanes and suggests they are retained.

c. Off road cycle tracks

The submissions queries whether cyclists will use the off road track

d. Trees

The submission queries where in the submitted documents details of the trees to be removed are shown, highlighting a particular concern about the green area between Brian Road and Griffith Avenue.

e. Construction Phasing

The submission asserts that construction of the Proposed Scheme should take place at a different time to the Ballymun and Swords CBCs.

f. Bus journey times

The submission expresses the view that the anticipated journey time savings presented during the public consultation process were excessive and that the proposed scheme appears to forecast to realise less journey time savings, while noting that a direct comparison is difficult as the Proposed Scheme does not include the section to Clongriffin Dart station.

g. Extents of CPO

The submission asserts that there is no land acquisition proposed at no 40-46 Malahide Road on Map 12 of the scheme drawings and queries if this will create a bottleneck at this location.

Responses to technical issues

a. Roundabouts

Section 2.1 of EIAR Chapter 2 Need for the Proposed Scheme sets out the objectives of the Proposed Scheme, which are to:

- Enhance the capacity and potential of the public transport system by improving bus speeds, reliability and punctuality through the provision of bus lanes and other measures to provide priority to bus movement over general traffic movements;

- Enhance the potential for cycling by providing safe infrastructure for cycling, segregated from general traffic wherever practicable;
- Support the delivery of an efficient, low carbon and climate resilient public transport service, which supports the achievement of Ireland’s emission reduction targets;
- Enable compact growth, regeneration opportunities and more effective use of land in Dublin, for present and future generations, through the provision of safe and efficient sustainable transport networks;
- Improve accessibility to jobs, education and other social and economic opportunities through the provision of improved sustainable connectivity and integration with other public transport services; and
- Ensure that the public realm is carefully considered in the design and development of the transport infrastructure and seek to enhance key urban focal points where appropriate and feasible

In order to achieve these objectives, it is essential to enhance pedestrian and cyclists safety, as well as providing priority to bus movement over general traffic movements, particularly at road junctions, including segregating cyclist from general traffic wherever practicable.

As highlighted in Section 2.3.3.5 of the EIAR Volume 2 Chapter 2 ‘The Department of Transport, Tourism and Sport (DTTAS) Smarter Travel - A Sustainable Transport Future (“Smarter Travel”) is the National planning policy document to deliver an integrated transport policy for Ireland as supported by Government. Section 7 page 48 of this policy document identifies “DMURS” as the key design manual applicable in achieving the Goal 7 of Smarter Travel which “*aims to support enhanced permeability and ensure that the universal design principle and Hierarchy of Road Users model is used to inform future investment decisions to reduce inequalities, support a whole of journey approach, and prioritise sustainable mobility.*” This internationally recognised ‘pedestrian first’ hierarchy of road users is shown in Figure 2.5.2 below.

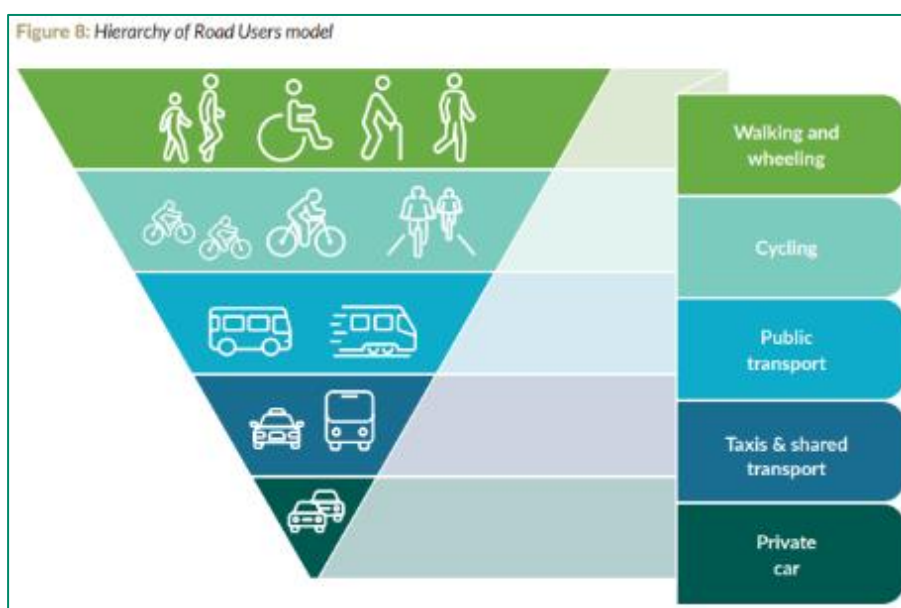


Figure 2.5.2: Smarter Travel Figure 8

“DMURS” is The Design Manual for Urban Roads and Streets (Government of Ireland 2013). DMURS advocates this hierarchy of road user model to encourage more sustainable travel patterns and sets out the principles, approaches and standards to be applied to the design of all urban roads and streets in Ireland, defined as those with a speed limit of 60 km/h or less.

Chapter 4 of EIAR Proposed Scheme Description provides details of how the scheme design was developed. Section 4.4 Design Principles sets out how the Preliminary Design Guidance Booklet for BusConnects Core Bus Corridors (PDGB) (NTA 2021), included as Appendix A4.1 in Volume 4 of the EIAR, was prepared to ensure that a consistent design approach for the Core Bus Corridor Infrastructure Works was adopted based on the objectives of the Proposed Scheme. The purpose of

the PDGB is to complement various existing guidance documents/design standards relating to the design of urban streets, bus facilities, cycle facilities and public realm. As listed in Section 4.4 DMURS as one of the key documents for the design of urban streets, bus facilities, cycle facilities and public realm.

Section 4.4.3 of DMURS relates to junction design and in respect of roundabouts states: *“Large roundabouts are generally not appropriate in urban areas. They require a greater land take and are difficult for pedestrians and cyclists to navigate, particularly where controlled crossings/cycle facilities are not provided, and as such, vehicles have continuous right of way.”*

DMURS goes on to state that: *“Where large roundabouts currently exist, road authorities are encouraged, as part of any major upgrade works, to replace them with signalised junctions or retrofit them so that are more compact and/or pedestrian and cycle friendly, as is appropriate.”*

By contrast, in relation to traffic signalised junctions DMURS states that: *“These can provide a wide range of capacities depending on the widths of the approaches, the presence of bus lanes on approach, cycle times and turning traffic flows. Traffic signal junctions can include pedestrian phases and advanced stop lines for cyclists, thus making them safer. Traffic Signals should generally be used at all junctions between Arterial and Link streets. Where pedestrian activity is particularly high (such as within a Centre or around a Focal Point), designers may apply all-round pedestrian phase crossings with diagonal crossings.”*

The above quotes from DMURS are directly applicable to the two existing large roundabouts on the route of the Proposed Scheme, namely the Blunden Drive / Malahide Road junction and the Ardlea Road / Malahide Road junction.

It is clear from the above that the retention of the roundabouts would be contrary to the requirements of DMURS. Furthermore, in relation to achieving the scheme objectives the replacement of the Blunden Drive / Malahide Road and the Ardlea Road / Malahide roundabouts with signalised junctions is essential to achieving the necessary enhanced pedestrian, cyclist and bus priority infrastructure.

Section 6.3.2.4.1 of EIAR Chapter 6 Traffic and Transport describes the characteristics of these two existing roundabout junctions and these are shown in Images 6.4 and 6.9 within Section 6.3.2.4.1, see Figure 2.5.3 below. In particular buses are not provided any priority over general traffic at either junction and there is an absence of controlled pedestrian crossing facilities on three of the four arms at Blunden Drive.



Image 6.4: R107 Malahide Road / Priorswood Road / Blunden Road Four-Arm Roundabout



Image 6.9 R07 Malahide Road / Ardlea Road / R808 Gracefield Road Four-Arm Roundabout

Figure 2.5.3: Existing roundabout layouts at Blunden Drive and Ardlea Road.

EIAR Chapter 6 Traffic and Transport Appendix A6.3 Junction Design Report sets out the design rationale for both junctions to be upgraded to a 4 arm signalised junction.

For the Blunden Drive / Malahide Road junction the key design rationale is to introduce pedestrian crossing facilities on all arms of the junction, provide protected cycle infrastructure and crossing facilities, whilst improving bus priority. The proposed junction arrangement will provide a more compact junction, reducing crossing distances for pedestrians and cyclists through the junction.

For the Ardlea Road / Malahide Road junction the design rationale is to enhance pedestrian, cyclist and bus priority infrastructure by introducing more direct and compact pedestrian crossing facilities on all arms of the junction, provide protected cycle infrastructure and crossing facilities, whilst improving bus priority.

b. Removal of left turn slips

As described in the preceding paragraph relating to roundabouts, Smarter Travel and DMURS are the key national policy and design guidance relevant for the Proposed Scheme. Section 4.4.3 of DMURS relates to junction design and sets out how junction design is largely determined by volumes of traffic and while the design of junctions has traditionally prioritised motor vehicle movement, designers must take a more balanced approach to junction design in order to meet the objectives of Smarter Travel and DMURS.

Specifically, DMURS states that designers should, inter alia, *“Omit left turn slips, which generally provide little extra effective vehicular capacity but are highly disruptive for pedestrians and cyclists. Where demand warrants, they may be replaced with left turning lanes with tighter corner radii”*.

In addition, the NTA’s Draft GDA Transport Strategy (GDATS) 2022 – 2042 identifies a range of measures to achieve the aims of the Draft GDATS, as noted in Table 3.7 of Appendix A2.1 Planning Report of EIAR Chapter 2 Need for the Scheme. Measure WALK3 relates to Improved Junctions and sets out how the NTA, in conjunction with local authorities, will implement junction improvements across the GDA to, inter alia, enhance movement by pedestrians and cyclists via a programme of

removal of slip lanes at appropriate locations, together with consideration of junction signalling changes to better balance the use of the junction between motorised and vulnerable modes.

It is clear from the above that the retention of the left turn slip lanes would be contrary to the requirements of DMURS. In relation to achieving the scheme objectives the removal of left turn slip lanes is essential to achieving the necessary enhanced pedestrian, cyclist and bus priority infrastructure.

c. Off road cycle tracks

The assessment of various options for the section of the Proposed Scheme between Griffith Avenue and Marino Mart / Fairview is described in Section 6.5 of the Preferred Route Option Report. Section 7.2.3 of the same report then sets out the rationale for the inclusion of the off road cycle routes, noting that the inclusion of cycle tracks on this section of the Malahide Road would result in significant additional impacts on private properties. Therefore, it was determined that the preferred route was to provide an alternative cycle route through a parallel, less trafficked route along Brian Road, Carleton Road and Haverty Road. Cyclists will then re-join at Marino Mart and tie-in with the Clontarf to City Centre Cycle and Bus Priority Project, currently being developed by DCC.

While the EPR Option indicated that Haverty Road would remain as a through route, after taking into account the safety and convenience of all road users, as well as the residents of the area, it is now proposed to close Haverty Road for vehicular traffic at St Aidan's Park Road end of the street. Provision will be made to allow emergency vehicles use this junction. This proposal will also help to further reduce traffic on Brian Road, Carleton Road and Haverty Road, which will provide a more attractive and safer route for cyclists.

d. Trees

EIAR Volume 4 Part 2 Chapter 17 provides the Arboricultural Impact Assessment Report, which includes detailed drawings showing all trees that are to be removed. In addition, the Landscaping General Arrangement drawings included in EIAR Volume 3 Chapter 4 Section 5 also show all individual trees to be removed.

At the specific location highlighted in the submission a single tree is proposed to be removed. This is required to allow the inclusion of a short length of two-way cycle track which is necessary to connect to the start of the Quiet Street treatment on Brian Road.

e. Construction Phasing

EIAR Volume 2 Chapter 21 Cumulative Impacts Section 21.2.6.2 states that based on the outputs from the assessment of the Combined Worst-Case scenario, to avoid potential traffic and associated environmental impacts it is proposed that the Ballymun/ Finglas to City Centre Core Bus Corridor Scheme will not be constructed concurrently with the Swords and Blanchardstown Schemes. The assessment concluded that there are no such limitations on the timing of the construction of the Clongriffin to City Centre Core Bus Corridor Scheme as no significant additional impacts are expected due to its construction concurrent with other Core bus Corridor Schemes over and above those predicted for the stand-alone scheme.

f. Bus journey times

As part of the three phases of non-statutory consultations during the development of the scheme proposals, the Information Brochures presented certain key facts pertaining to the Clongriffin core bus corridor, including:

- Current bus journey time: up to 65 mins;
- BusConnects journey time: 30-35 mins;
- Future Bus journey time without BusConnects: 85 mins.

As noted by the submission, a direct comparison between the figures provided in the Information Brochure and the assessed journey times for the Proposed Scheme is not possible as the section of the Emerging Preferred Route along Belmayne Main Street and Belmayne Avenue is no longer part of the Proposed Scheme since DCC is progressing these works as the Belmayne Main Street and Belmayne Avenue Scheme.

The information presented in the November 2020 Public Consultation Brochure relates to journey time information for a Corridor which commenced at the R139 Temple View Avenue bus stop and continued eastwards to the R107 Malahide Road, where it turned southwards along the R107 Malahide Road and R105 North Strand Road finishing at the Connolly Station bus stop. Journey time information for this route was extracted from the Automatic Vehicle Location (AVL) data from the Dublin Bus fleet. This journey time information revealed that bus journey times along this route can take up to 65 minutes, this data was extracted from the 95th percentile bus journey time data along this route. The high level of segregation, priority and traffic light hurry calls being proposed by the Bus Connects infrastructure project is anticipated to deliver more consistent bus journey times closer to the 25th percentile bus journey time along this route, approximately 35 minutes.

The information presented in the Clongriffin to City Centre EIAR, relates to a shorter section of the route than that presented in the November 2020 Public Consultation Brochure. The route presented in the EIAR, that the section being applied for under the current application, commences at Mayne River Avenue on the R107 Malahide Road and travels southwards along the R107 Malahide Road terminating at the junction with the R105 North Strand Road. A further section from the R107 Malahide Road / R105 North Strand Road junction to Amiens Street is currently being progressed as part of the Clontarf to City Centre Project currently being progressed and delivered by Dublin City Council.

As outlined to Chapter 6 (Traffic and Transport) of the EIAR documentation average journey time data is presented from the modelled micro-simulation analysis. This analysis reveals that along this shorter route the average journey time saving in the AM peak goes from 22 minutes in the 2028 Do Minimum scenario to 18 minutes in the DoSomething scenario. This translates to a total average journey time saving of 4 minutes in the AM peak in 2028.

Chapter 6 also explicitly acknowledges that the variation in average journey times is based on one set of predicted flows for the Do Minimum and DoSomething scenario. In reality as stated in Chapter 6 *“traffic flows fluctuate daily which would mean that the variation in journey times would be much greater in the Do Minimum with any increases in traffic flows compared to the protection of journey time reliability provided by the bus priority measures that comprise the Proposed Scheme”*.

This variation in journey times along a corridor with lower levels of segregation and priority can lead to the larger 95th percentile journey times as seen in the AVL data for the route presented in the November 2020 public consultation brochure.

Overall, it is anticipated that the improvements in journey times and reliability for bus users along the Proposed Scheme will have a Positive, Significant and Long-term effect.

g. Extents of CPO

Section 4.5.2.1 of EIAR Chapter 4 Proposed Scheme Description describes the proposals for the section of the route between Griffith Avenue Junction and Clontarf Road Junction, where it is proposed to provide a bus lane and a general traffic lane in both directions. There are currently only three traffic lanes on this section of road and to facilitate the new four lane arrangement, land acquisition is required from adjacent properties at the following locations:

- Between Charlemont Road and Crescent Place (inbound side); and
- Between Crescent Place and Clontarf Road (outbound side).

The extents of this land acquisition are shown on the General Arrangement Drawings included in EIAR Volume 3 Chapter 4 Appendices, as shown in Figure 2.5.4 below.



Figure 2.5.4: Extract of the Proposed Scheme General Arrangement Drawings

The proposed lane arrangement and necessary route cross section can be achieved without the need for land acquisition from numbers 40-46 Malahide Road and there will not be a bottleneck at this location.

2.5.4 10 – Transport Infrastructure Ireland

Overview of submission

The submission is a one sentence letter stating simply that Transport Infrastructure Ireland has no observations to make in relation to the Proposed Scheme.

Response to submission

N/A

2.5.5 43 – Dublin Commuter Coalition

Overview of submission

This submission raised the following issues:

- i) Advocate for the Proposed Scheme;
- ii) Road Widths;
- iii) Enforcement;
- iv) Junction Design;
- v) Pedestrian Crossings;

i) Advocate for the Proposed Scheme

Summary of issue

The submission sets out that the Dublin Commuter Coalition is a voluntary advocacy group for public transport users, cyclists, and pedestrians in Dublin and surrounding counties. The submission notes that the Dublin Commuter Coalition has been engaging with the NTA over the last three years and they believe the project will be a catalyst for greater usage of public transport and active travel. The submission welcomes measures along the Proposed Scheme such as increased bus priority, safer cycling infrastructure, removal of slip lanes, improved permeability between Ayrfield Drive and Malahide Road and the filtered permeability at Haverty Road. The submission states its support for the project and has requested modifications to the Proposed Scheme design.

Response to issue

The NTA recognises the benefit of the continued engagement with the Dublin Commuter Coalition and other advocacy groups through the three rounds of non-statutory public consultation, community forums and one to one meetings in developing the Proposed Scheme. The NTA welcomes the support from the advocacy group for the Proposed Scheme. Requests to modify particular detailed design aspects of the Proposed Scheme are noted and the NTA provides responses to those requests as set out in the following sections. The NTA looks forward to continuing to collaborate with the Dublin Commuter Coalition in achieving the Proposed Scheme objectives which have many synergies with the Dublin Commuter Coalition members vision in creating a Dublin that works for all users of sustainable transport.

ii) Road Widths

Summary of issue

The submission has queried the design rationale for providing a high number of vehicle traffic lanes along the Malahide Road to the north of Priorswood Road and raises concerns that these large roads will discourage active travel.

Response to issue

The NTA acknowledges the comments raised in relation to the number of traffic lanes to the north of Priorswood Road and notes that as stated in Section 5.3.2.4 of the Traffic Impact Assessment Report within the EIAR, the R107 Malahide Road acts as the alternative route to Dublin Port, when the Port Tunnel is closed, meaning that at times it has to cope with higher flows of HGVs than during 'typical' traffic flow periods. This has had a particular bearing upon the design of the Proposed Scheme, in terms of road widths and junction design to allow for a resilient sustainable transport corridor.

The NTA notes the comments raised in relation to the potential for increase in car mode share. As set out in Section 7.2.3 of the Transport Impact Assessment Report, it is envisaged that the population will grow by 11% up to 2028 and 25% by 2043 (above 2016 census data levels). Similarly, employment growth is due to grow by 22% by 2028 and 49% by 2043. Section 7.2.3.1.1 of the Transport Impact Assessment notes that the 24hr total trip demand within 500m of the scheme extents is estimated to increase to 2.02m trips (5% increase from 2020 pre-covid levels) in 2028 and to 2.81m trips (+19% increase from 2020 pre-covid levels) in 2043. Diagram 7.1 and 7.2 within the Transport Impact Assessment Report highlight that the implementation of the Proposed Scheme will result in a 6.6% (from +2.8% without the Proposed Scheme to -3.8% with the Proposed Scheme) & 8.8% (from +4.4% without the Proposed Scheme to -3.6% with the Proposed Scheme) reduction in

the number of 24 hour trips by car mode share in 2028 and 2043 respectively. Similarly Diagram 7.2 indicates that the Proposed Scheme will result in an increase of 11.4% and 34.4% (relative to 2020 pre-COVID) in the number of 24 hour trips by sustainable mode share in 2028 and 2043 respectively.

The NTA also notes that there are a number of bus, cycling and pedestrian priority measures (both physical and signalling solutions) that are implemented within the Proposed Scheme that will prioritise these sustainable modes and improve journey times and journey time reliability.

iii) Enforcement

Summary of issue

The submission has outlined its views in relation to the importance of enforcement for lawful use of bus lanes such that the benefits of the Proposed Scheme will be realised by passengers.

Response to issue

The NTA acknowledges the comments raised in relation to camera enforcement. Whilst enforcement for the lawful use of bus lanes is currently a matter for An Garda Síochána the NTA is separately exploring proposals and methods for bus lane enforcement as set out under *Measure INT20 – Enforcement of Road Traffic Laws* of the Draft Greater Dublin Area Transport Strategy 2022-2042. Notwithstanding this, specific measures have been considered in the development of the Proposed Scheme that will help deter inappropriate and unlawful use of bus lanes including advanced bus signal detection systems which will activate green signals at traffic lights for authorised vehicles only.

iv) Junction Design

Summary of issue

The submission has queried the design approach undertaken by the NTA in relation to adopting international best practice. The submission references a 'Dublin-style' junction, 'Dutch-style' junction and 'CYCLOPS' junction and queries the safety rationale for the junction designs in the Proposed Scheme.

Response to issue

1 Principles of Protected Junction Design for BusConnects

The NTA wishes to clarify following terms 'Dublin-style' junction and 'dutch-style' junction 'CYCLOPS' junction do not form part of the Proposed Scheme application description.

It is important to note that no two junctions are the same. Junctions on the Proposed Scheme have broadly been categorised into 4 types of junction as set out in Appendix A4.1 BusConnects Preliminary Design Guidance Booklet (PDGB) of the EIAR and specifically set out at each location in the Junction Design Report which have been included in Appendix A6.3 and summarised in Table 4.4 and Table 4.7 in Chapter 4 of the EIAR. A more detailed description of the junction types on the Proposed Scheme is provided in Sections 5.3.3.1, 5.3.3.2, 5.3.3.3 and 5.3.3.4 of the Preliminary Design Report with a detailed summary of the junction types along the Proposed Scheme also provided in Table 5-2 of the Preliminary Design Report.

The junction types set out in the PDGB directly align to the Proposed Scheme core aim and objectives. One of the core aims of the Proposed Scheme is to:

“Enhance the potential for cycling by providing safe infrastructure for cycling, segregated from general traffic wherever practicable.”

The proposed scale of the BusConnects CBC Infrastructure Works will be transformational for cycling in Dublin, delivering a large number of the primary cycling routes identified in the Greater Dublin Area Cycle Network plan. With proposals of this scale, it is critical that the overall design approach matches the stated ambition, and can achieve a longevity that such investment deserves. With this in mind, the NTA set about developing 'Design Principles' for the project. These principles would complement existing documents and standards such as the National Cycle Manual and DMURS. The PDGB was developed to outline the agreed design principles and to enable consistency of design.

Documents such as the National Cycle Manual and DMURS continue to serve the engineering and development industry well and over the past 7-10 years, have played an important role in allowing Ireland to follow international best practice. The PDGB, like all guidance documents, was developed

to be cognisant of the everchanging nature of society, including commuting patterns and behaviours. To acknowledge the expected increase in cycling numbers and to set about achieving the necessary 'step change' to cater for this increase, international best practice from countries which have already experienced this transition successfully was consulted. The ambition of the PDGB was to take the benefits of the traditional junction layout from the National Cycle Manual and supplement this with a range of measures aimed at increasing protection for cyclists and reducing uncontrolled conflict with pedestrians.

The Netherlands has one of the highest rates of bicycle use in the world, provides the widest range of cycling know-how and is famous worldwide for its cycling infrastructure. The 'Ontwerprijzer Fietsverkeer' (Dutch Cycle Design Guide) was used during the development of the PDGB. Of particular interest to the NTA, was how the design of junctions could be improved to offer better protection to cyclists.

The typical protected junction layout, as shown in Figure 2.5.5 below, offers significant safety improvements compared to the traditional junction layout. The deflection of the cycle track at the junction allows the protection kerb (Note 4) to be positioned on the corner of the junction. In urban locations subject to spatial constraints, the protection kerb provides a tighter turning radius for vehicles and will force the left-turning motorist to reduce speed before making the tighter turn. This design layout also keeps straight-ahead and right-turning cyclists on the raised-adjacent cycle track as far as the junction, avoiding any cyclist-vehicle conflict at weaving and merging lanes, for example, where access to a dedicated left-turn lane would previously have necessitated a vehicle to cross the cycle lane. Right-turning cyclists will navigate the cycle lane on the junction and turn right (in a controlled manner) after it crosses the side arm. Other benefits to this junction design include:

- a) Traffic Signal arrangement removes any uncontrolled pedestrian-cyclist conflict;
- b) Raised and protected cycle track approaching junction;
- c) Reduced risk of side-swipe due to the removal of cyclist-vehicle conflict at weaving and merging lanes on all approaches;
- d) Improved right-turning safety; and
- e) Improved sight lines for left turning traffic.

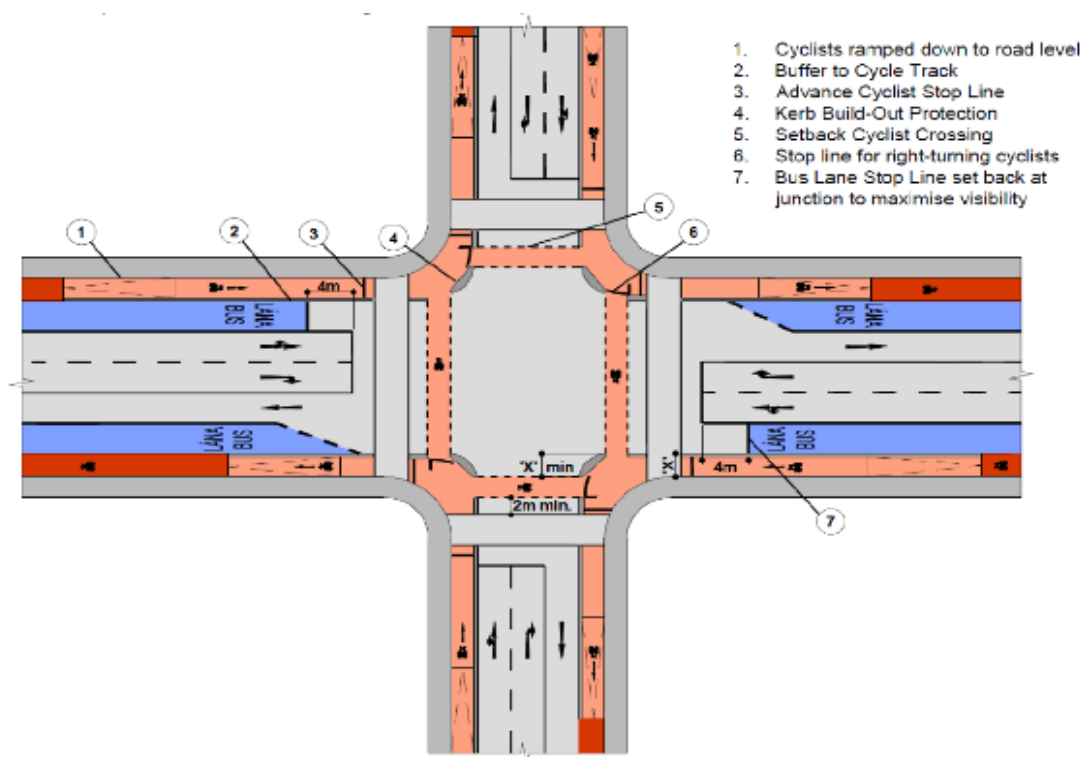


Figure 2.5.5: Typical Junction Layout from BusConnects Design Guidance Booklet

2 Pedestrian-Cyclist Conflict

Spatial constraints are an important factor in determining any junction design. This is especially the case in urban settings. Where possible, the protected junction has been proposed to be retrofitted into all existing junctions, taking into consideration the best practice from international settings including the Netherlands. The NTA notes the Dublin Commuter Coalition has set out their preference for the 'Dutch style' junction type as described within the submission. There are, however, legislative, behavioural and other practical considerations that need to be taken into account when looking at these international examples. Consideration for all of these elements has led to the development of the four junction types described in the PDGB.

An important consideration during the development of the PDGB was implementation of measures to mitigate pedestrian-cyclist conflict. The 'Dutch-style' junction described in the submission is typical of many junctions in the Netherlands and it allows for a potential un-signalised conflict between pedestrians and cyclists, which depends on a level of courtesy to ensure that collisions are avoided. Following discussions with Irish disability groups, the issue of this potential conflict was raised as a significant concern along the core bus corridors for the visually impaired and for the mobility impaired, based on their members' experiences. Pedestrians are the most vulnerable of road users, and the addition of disability exacerbates this vulnerability. The four junction types within the PDGB have specifically been set out to mitigate these potential conflicts insofar as is reasonably practicable.

Similarly the layout of the 'dutch style' junctions described in the submission can result in a reduced level of service for pedestrians. The layout of these junctions require a multi-movement, sometimes multi-directional, non-continuous crossings for pedestrians required with at least 3 crossing movements (2 x cycle track crossing, 1x carriageway) to cross a side road of a typical junction. The intermediate landing area for pedestrians between the cycle track and carriageway requires a suitably sized holding area for pedestrians to wait before crossing the road, this can require a significant space for urban locations. Junction types 1-3 in the PDGB aim to consolidate and segregate/confine this waiting area to within the footpath, thus creating a more legible and functional use of the available space for all users with direct crossing facilities that align to the principles of DMURS.

It is for these reasons that the layout of the 'dutch style' junctions described in the submission have not been adopted for junctions on the Proposed Scheme.

3 Use of Traffic Signals to Yield to Cyclists

The concept of allowing both cyclists and general traffic to proceed together in the same direction is not uncommon and the same traffic signals arrangement also caters for left-turning traffic. In the Netherlands, there are scenarios where the equivalent right-turn movement can be green whilst cyclists are also green. There is, however, an additional requirement to yield to cyclists in this Dutch scenario (see Figure 2.5.6 below).



Figure 2.5.6 Example from the Netherlands of traffic signals + give way signage controlling turning traffic and cyclists

The arrangement depicted above from the Netherlands is beneficial for cyclists in that it minimises delay time but should be subject to design thresholds, which are outlined below. Heavy turning volumes, HGV movements (difficulty with blind spots), high speed environments etc. have been considered during the design of junctions as part of the Proposed Scheme. The PDGB also includes guidance on appropriate signage to be provided to reinforce the requirement for motorists to yield to straight ahead traffic in such locations.

The Dutch themselves have a suite of solutions for different scenarios – no one solution works everywhere. For junctions to operate safely and effectively, it is critical that the control of all movements is considered. All road users can have their own traffic signals at junctions (pedestrians, cyclists, buses, vehicles). To achieve optimum operational efficiency including the efficient movement of cyclists, it is also possible for some movements to occur safely at the same time. To assist with these design decisions, thresholds for turning movements have been used. Chapter 6 (Page 153) of the Dutch Design Guide Ontwerprijzer Fietsverkeer discourages partial conflicts between cyclists and vehicles if the volume of turning vehicular traffic exceeds 150 PCU¹s per hour. See the above extract from Ontwerprijzer Fietsverkeer which identifies the above threshold.

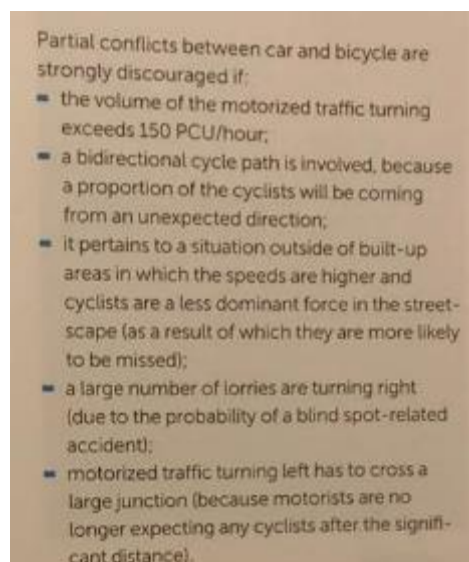


Figure 2.5.7: Extract from Dutch Design Guide Ontwerprijzer Fietsverkeer

To put the above turning thresholds into context, 150 PCUs per hour equates to approximately 5 cars on average turning per 120 second cycle, or between 3 and 4 cars turning on average per 90 second cycle. The Proposed Scheme also provides other measures such as kerb segregation, advanced position cycle stop lines and early starts for cyclists which will further segregate and reduce the number of interactions between cyclists and vehicles. All these elements form the basis of a typical junction design and operation, thus no one element of a junction design should be considered in isolation.

Nine of the fourteen key junctions on the Proposed Scheme have implemented this approach to achieve optimum operational effectiveness including the efficient movement of cyclists. Introducing separate signal phases will increase delay for cyclists at junctions. This arrangement will promote the sustainable mode hierarchy for cyclists at junctions by providing priority to ahead cyclists over turning cars. At each of these junctions the left turning vehicle traffic volumes in these locations are estimated to be less than the 150PCU threshold and similarly low HGV volumes are estimated in line with the principles established by international guidance. In addition to specific signage such as that presented in Figure 39 and Figure 40 of the PDGB, at each of the nine locations a three to five second early start for cyclists is typically provided to further mitigate the potential for the number of interactions with vehicles/cyclists at these locations. The Proposed Scheme has also been subject to Road Safety Audits at different stages that have informed the design development of the Proposed Scheme.

Separately, the NTA and Dublin City Council will continue to promote the already established driver awareness campaign that seeks to promote driver awareness in line with the Road Safety Authority rules of the road as noted below:

When turning left, or right, all drivers must watch out for cyclists going ahead or turning. When making a turn, watch out for cyclists in front of you or coming up on your left or right. Do not overtake a cyclist as you approach a junction if you are turning left or right, as the cyclist may be continuing straight ahead.

¹ Vehicle to Passenger Car Unit (PCU) conversion as per TfL Values; Pedal Cycle – 0.2, Motor Cycle – 0.4, Passenger Car/LGV – 1.0, Medium Goods Vehicle (MGV/OGV1) – 1.5, Buses and Coaches – 2.0 and Heavy Goods Vehicle (HGV/OGV2) – 2.3

v) Pedestrian Crossings

Summary of issue

The submission has queried the design rationale for providing two stage crossings on the Malahide Road as part of the Proposed Scheme in particular at junctions with Clarehall Avenue, Priorswood Road, Greencastle Road, Tonlegee Road, St. Brendan's Drive, Ardlea Road, Griffith Avenue and near Belcamp Lane. The submission also notes some junctions are missing pedestrian crossings at one or more arms including Malahide Road/Clarehall Shopping Centre and the Malahide Road/Griffith Avenue Junction.

Response to issue

The NTA acknowledges the comments raised in the submission and note that the Proposed Scheme will provide an average increase in footway area for pedestrians of 26% inbound and 14% outbound across the corridor compared to the existing scenario. The Proposed Scheme will increase the number of controlled pedestrian crossings from 36 in the existing to 52 in the Proposed Scheme, equating to a 70% increase. Additionally, there will be an increase in the number of raised table crossings on side roads from 9 in the existing to 31 in the Proposed Scheme, equating to a 244% increase.

The summary level design rationale for each of the junctions on the Proposed Scheme is set out in Appendix A6.3 Junction Design Report of the Traffic Impact Assessment Report. For the pedestrian crossings at the junctions of Clarehall Avenue, Priorswood Road, Greencastle Road, Tonlegee Road, St. Brendan's Drive, Ardlea Road, Griffith Avenue and near Belcamp Lane direct single movement crossings were explored in accordance with the approach set out in Section 5.6 of the PDGB. However, at these locations two stage crossings are the preferred design as a straight-across would result in a crossing distance of greater than 19m. As such the overall junction performance and people movement would be reduced by introducing direct single stage crossings on all arms which is not desirable at these locations.

As summarised in the Junction Design Report, at the Malahide Road/Clarehall Shopping Centre junction the existing pedestrian crossing on the southern arm was reviewed in light of the dominant pedestrian desire line to Clarehall Shopping Centre. Pedestrians would be required to cross two arms to access the shopping centre i.e. Malahide Road and the Shopping Centre arm. The toucan crossing on the northern arm, enables pedestrians and cyclists to cross one arm only, providing a more direct alignment into the shopping centre.

As summarised in the Junction Design Report, at the Malahide Road/Griffith Avenue Junction a pedestrian crossing is not proposed on the southern arm (as per existing scenario) of the junction for the following reasons: 1) No immediate desire line identified. 2) the proposed design seeks to segregate interaction with the two-way cycle track. 3) a direct crossing distance would be in excess of 19m which would compromise overall people movement capacity within the junction due to lengthy intergreen periods.

2.5.6 59 – Dublin Cycling Campaign

Overview of submission

This submission raised the following issues:

- i) Advocate for the Proposed Scheme;
- ii) Cycling for all ages and abilities;
- iii) Existing Cycling Conditions;
- iv) Proposed Cycling Infrastructure;
- v) Requested Modifications for Safety;
 - a. Junction Design;
 - b. Green Buffer Space Between Cycle Track and Road;
- vi) Requested Modifications for Comfort and Inclusion;
 - a. Shared Walking and Cycling Spaces and Crossings; and
 - b. Width of cycle track.

i) Advocate for the Proposed Scheme

Summary of issue

The submission sets out that the Dublin Cycling Campaign is a registered charity that advocates for better cycling conditions in Dublin. The submission notes that the Dublin Cycling Campaign has been engaging with the NTA through all stages of the project including multiple rounds of public consultation, community forums, and through one to one meetings. The submission states its support for the project and has requested modifications to the Proposed Scheme design. The submission also requests an Oral hearing from the Board.

Response to issue

The NTA recognises the benefit that the continued engagement with the Dublin Cycling Campaign and other advocacy groups through the three rounds of non-statutory public consultation, community forums and one to one meetings has had in developing the Proposed Scheme. The NTA welcomes the support from the charity for implementing the Proposed Scheme. The NTA notes the request for an Oral hearing which will be a matter for An bord Pleanála to decide. Requests to modify particular detailed design aspects of the Proposed Scheme are noted and the NTA have provided responses to those requests as set out in the following sections. The NTA looks forward to continuing to collaborating with the Dublin Cycling Campaign in achieving the Proposed Scheme objectives which have many synergies with the Dublin Cycling Campaign's vision for a vibrant city where people of all ages and abilities can choose to cycle as part of their everyday life.

ii) Cycling for all ages and abilities

Summary of issue

The submission sets out the views of the Dublin Cycling Campaign in relation to categorising different cyclists into four types including *Strong and Fearless*, *Enthusied and Confident*, *Interested but Concerned*, and *No Way, No How*. The submission provides a graphical representation of the four types of cyclists in the Appendix and suggests that the Proposed Scheme needs to resolve particular issues to attract the large '*Interested but Concerned*' cohort of cyclists to promote modal shift to fulfil the goals of the National Sustainable Mobility Policy.

Response to issue

The NTA acknowledges the submission's approach to categorising cyclists by characteristic type and notes that there are multiple industry studies that have taken a similar approach, however, the Proposed Scheme has not set out to target any particular cycling cohort. The Proposed Scheme will provide a safe, sustainable transport corridor that can provide a sustainable alternative mode of transport for all ages and abilities.

Comments raised in relation to the recently published National Sustainable Mobility Policy are noted and the Proposed Scheme aim and objectives as set out in Section 1.2 of Chapter 1 in the EIAR have a direct alignment to the objectives that underpin this policy.

iii) Existing Conditions

Summary of issue

The submission states the existing cycling conditions along the Proposed Scheme are extremely poor. The submission notes the outer dual carriageway portion of the Proposed Scheme is subject to high traffic speeds and volumes and notes the existing junctions to be very large in size with no cycling infrastructure present along this section. The submission notes from Artane to Fairview that the existing cycling conditions are marginally improved in comparison to the outer dual carriageway section but not deemed to be an appropriate cycling facility to attract cyclists of all abilities.

Response to issue

The NTA acknowledges the comments raised in relation to the existing environment for cyclists. An assessment of the existing arrangement compared to the Proposed Scheme has been set out in Appendix A6.4.2 of the Transport Impact Assessment and summarised in Section 8 of the Transport Impact Assessment main report. The results of the assessment demonstrate that the Level of Service of the Do Minimum (existing infrastructure) scenario is typically of C rating. For the Do Something (Proposed Scheme) scenario, the Level of Service is predominantly of the highest A / A+ rating, with the exception of one B (along the proposed low traffic volume, low traffic speed cycle route section via Brian Road). The improvements will have a Medium Positive Impact for the Proposed Scheme. Additional information in relation to the Level of Service Impact assessment can be found in Section 4.2.3.1 of the Transport Impact Assessment Report.

Comments in relation to existing high traffic speeds on the outer dual carriageway portion are noted. As set out in Chapter 4 Section 4.5.1 and Section 4.6.1, the Proposed Scheme will provide narrower traffic lanes and tighter junction radii in line with DMURS principles which is accompanied with a speed limit reduction to 50km/hr on the outer dual carriageway section.

iv) Proposed Cycling Infrastructure

Summary of issue

The submission states the proposed cycling infrastructure would significantly improve the existing situation that would attract more cyclists to the route due to a number of factors including the continuous kerb protected cycle tracks, segregation of buses and cyclists at bus stops, protected junction designs.

Response to issue

The NTA acknowledge and welcome the comments raised in relation to the support for the Proposed Scheme including the kerb protected cycle tracks, provision of island bus stops and protected junction designs. Comments relating to concerns over junctions designs are noted and responded to in subsequent sections.

v) Requested Modifications for Safety

a. Junction Design - Summary of issue

The submission has categorised/summarised the 4 typical junction types as set out in Appendix A6.3 Junction Design Report to two styles of junction for cyclists. The submission has referred to Junction Type 4 as 'the Cyclops junction' type and junctions Type 1, 2 and 3 as the 'Dublin-style' junction. The submission makes reference to the importance for shorter pedestrian crossings for those with mobility impairments. The submission also makes reference to constructed examples of junction types and legacy BusConnects designs which the submission has referred to as 'Dutch-style' junction designs with some example visuals which align to the text submission. The submission has explicitly requested a response to the following questions:

- 1. What evidence does the NTA have about the safety of their new junction design Type 1 -3?*
- 2. Why Hasn't the NTA used an international standard junction design, which has been proven to be effective, such as the Cyclops (Type 4) or Dutch junction on all junctions in this project?*

3. Why was pedestrian crossing distance not included in the Pedestrian Infrastructure Assessment in EIAR Chapter 6 (Appendix A6.4 page 2)?

4. How many proposed junction arms will have longer crossing distances for pedestrians?

a. Junction Design - Response to issue

a.1 Principles of Protected Junction Design for BusConnects

The NTA wishes to clarify the following terms and associated visuals provided in the appendix of the submission including 'Cyclops junction', 'Dublin-style' junction and 'dutch-style' junction do not form part of the Proposed Scheme application description.

It is important to note that no two junctions are the same. As noted in the submission, junctions on the Proposed Scheme have broadly been categorised into 4 types of junction as set out in Appendix A4.1 BusConnects Preliminary Design Guidance Booklet (PDGB) of the EIAR and specifically set out at each location in the Junction Design Report which have been included in Appendix A6.3 and summarised in Table 4.4 and Table 4.7 in Chapter 4 of the EIAR. A more detailed description of the Junction types on the Proposed Scheme is provided in Sections 5.3.3.1, 5.3.3.2, 5.3.3.3 and 5.3.3.4 of the Preliminary Design Report with a detailed summary of the junction types along the Proposed Scheme also provided in Table 5-2 of the Preliminary Design Report.

The junction types set out in the PDGB directly align to the Proposed Scheme core aim and objectives. One of the core aims of the Proposed Scheme is to:

“Enhance the potential for cycling by providing safe infrastructure for cycling, segregated from general traffic wherever practicable.”

The proposed scale of the BusConnects CBC Infrastructure Works will be transformational for cycling in Dublin, delivering a large number of the primary cycling routes identified in the Greater Dublin Area Cycle Network plan. With proposals of this scale, it is critical that the overall design approach matches the stated ambition, and can achieve a longevity that such investment deserves. With this in mind, the NTA set about developing 'Design Principles' for the project. These principles would complement existing documents and standards such as the National Cycle Manual and DMURS. The PDGB was developed to outline the agreed design principles and to enable consistency of design.

Documents such as the National Cycle Manual and DMURS continue to serve the engineering and development industry well and over the past 7-10 years, have played an important role in allowing Ireland to follow international best practice. The PDGB, like all guidance documents, was developed to be cognisant of the everchanging nature of society, including commuting patterns and behaviours. To acknowledge the expected increase in cycling numbers and to set about achieving the necessary 'step change' to cater for this increase, international best practice from countries which have already experienced this transition successfully was consulted. The ambition of the PDGB was to take the benefits of the traditional junction layout from the National Cycle Manual and supplement this with a range of measures aimed at increasing protection for cyclists and reducing uncontrolled conflict with pedestrians.

The Netherlands has one of the highest rates of bicycle use in the world, provides the widest range of cycling know-how and is famous worldwide for its cycling infrastructure. The 'Ontwerprijzer Fietsverkeer' (Dutch Cycle Design Guide) was used during the development of the PDGB. Of particular interest to the PDGB team, was how the design of junctions could be improved to offer better protection to cyclists.

The typical protected junction layout in Figure 2.5.8 below offers significant safety improvements compared to the traditional junction layout. The deflection of the cycle track at the junction allows the protection kerb (Note 4) to be positioned on the corner of the junction. In urban locations subject to spatial constraints, the protection kerb provides a tighter turning radius for vehicles and will force the left-turning motorist to reduce speed before making the tighter turn. This design layout also keeps straight-ahead and right-turning cyclists on the raised-adjacent cycle track as far as the junction, avoiding any cyclist-vehicle conflict at weaving and merging lanes, for example, where access to a dedicated left-turn lane would previously have necessitated a vehicle to cross the cycle lane. Right-turning cyclists will navigate the cycle lane on the junction and turn right (in a controlled manner) after it crosses the side arm. Other benefits to this junction design include:

- a) Traffic Signal arrangement removes any uncontrolled pedestrian-cyclist conflict;
- b) Raised and protected cycle track approaching junction;
- c) Reduced risk of side-swipe due to the removal of cyclist-vehicle conflict at weaving and merging lanes on all approaches;
- d) Improved right-turning safety; and
- e) Improved sight lines for left turning traffic.

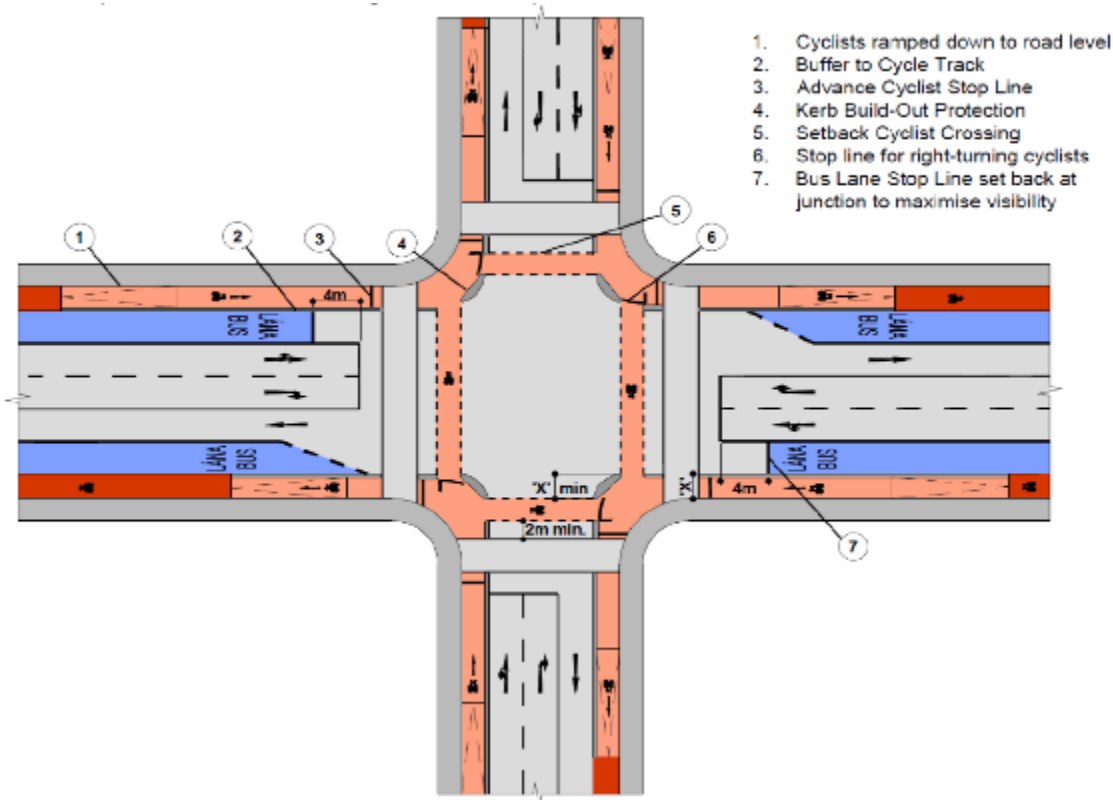


Figure 2.5.8 Typical Junction Layout from BusConnects Design Guidance Booklet

a.2 Pedestrian-Cyclist Conflict

Spatial constraints are an important factor in determining any junction design. This is especially the case in urban settings. Where possible, the protected junction has been proposed to be retrofitted into all existing junctions, taking into consideration the best practice from international settings including the Netherlands. The NTA notes the Dublin Cycling Campaign has set out their preference for the 'Dutch style' junction type as described within the submission. There are, however, legislative, behavioural and other practical considerations that need to be taken into account when looking at these international examples. Consideration for all of these elements has led to the development of the four junction types described in the PDGB.

An important consideration during the development of the PDGB was implementation of measures to mitigate pedestrian-cyclist conflict. The 'Dutch-style' junction described in the submission is typical of many junctions in the Netherlands and it allows for a potential un-signalised conflict between pedestrians and cyclists, which depends on a level of courtesy to ensure that collisions are avoided. Following discussions with Irish disability groups, the issue of this potential conflict was raised as a significant concern along the core bus corridors for the visually impaired and for the mobility impaired, based on their members' experiences. Pedestrians are the most vulnerable of road users, and the addition of disability exacerbates this vulnerability. The four junction types within the PDGB have specifically been set out to mitigate these potential conflicts insofar as is reasonably practicable.

Similarly the layout of the 'dutch style' junctions described in the submission can result in a reduced level of service for pedestrians. The layout of these junctions require a multi-movement, sometimes

multi-directional, non-continuous crossings for pedestrians required with at least 3 crossing movements (2 x cycle track crossing, 1x carriageway) to cross a side road of a typical junction. The intermediate landing area for pedestrians between the cycle track and carriageway requires a suitably sized holding area for pedestrians to wait before crossing the road, this can require a significant space for urban locations with high pedestrian volumes. Junction types 1-3 in the PDGB aim to consolidate and segregate/confine this waiting area to within the footpath, thus creating a more legible and functional use of the available space for all users with direct crossing facilities that align to the principles of DMURS.

It is for these reasons that the layout of the 'dutch style' junctions described in the submission have not been adopted for junctions on the Proposed Scheme.

a.3 Use of Traffic Signals to Yield to Cyclists

The concept of allowing both cyclists and general traffic to proceed together in the same direction is not uncommon and the same traffic signals arrangement also caters for left-turning traffic. In the Netherlands, there are scenarios where the equivalent right-turn movement can be green whilst cyclists are also green. There is, however, an additional requirement to yield to cyclists in this Dutch scenario (see Figure 2.5.9 below).



Figure 2.5.9 Example from the Netherlands of traffic signals + give way signage controlling turning traffic and cyclists

The arrangement depicted above from the Netherlands is beneficial for cyclists in that it minimises delay time but should be subject to design thresholds, which are outlined below. Heavy turning volumes, HGV movements (difficulty with blind spots), high speed environments etc. have been considered during the design of junctions as part of the Proposed Scheme. The PDGB also includes guidance on appropriate signage to be provided to reinforce the requirement for motorists to yield to straight ahead traffic in such locations.

The Dutch themselves have a suite of solutions for different scenarios – no one solution works everywhere. For junctions to operate safely and effectively, it is critical that the control of all movements is considered. All road users can have their own traffic signals at junctions (pedestrians, cyclists, buses, vehicles). To achieve optimum operational efficiency including the efficient movement of cyclists, it is also possible for some movements to occur safely at the same time. To assist with these design decisions, thresholds for turning movements have been used. Chapter 6 (Page 153) of the Dutch Design Guide Ontwerprijzer

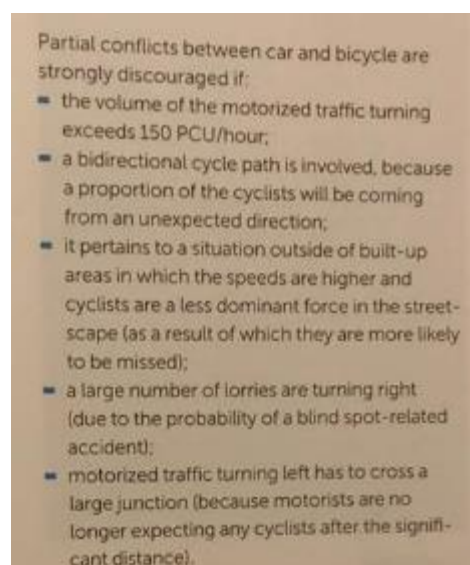


Figure 2.5.10: Extract from Dutch Design Guide Ontwerprijzer Fietsverkeer

Fietsverkeer discourages partial conflicts between cyclists and vehicles if the volume of turning vehicular traffic exceeds 150 PCU²s per hour.

To put the above turning thresholds into context, 150 PCUs per hour equates to approximately 5 cars on average turning per 120 second cycle, or between 3 and 4 cars turning on average per 90 second cycle. The Proposed Scheme also provides other measures such as kerb segregation, advanced position cycle stop lines and early starts for cyclists which will further segregate and reduce the number of interactions between cyclists and vehicles. All these elements form the basis of a typical junction design and operation, thus no one element of a junction design should be considered in isolation.

Response to Specific Queries Raised

1. What evidence does the NTA have about the safety of their new junction design Type 1-3?

All junction types as set out in the PDGB have been specifically developed to provide a balanced approach to safety for all modes and in particular to mitigating some of the significant concerns raised by disability advocacy groups for the visually impaired and for the mobility impaired, based on their members' experiences relating to potential conflicts between pedestrians and cyclists. Pedestrians, and in particular vulnerable pedestrians, are at the top of the road user hierarchy as outlined within DMURS. The Proposed Scheme will attract a high volume of pedestrians and cyclists with the proposed infrastructure and urban realm improvements along one of the busiest core bus corridors in the city. As such the protected junction designs proposed within the PDGB serves to improve safety at the junctions, in line with the road user hierarchy.

The submission has raised a specific concern in relation to the concurrent cyclist ahead movement with left turning vehicle traffic (under a flashing amber/give way to cyclists) and the potential for the 'left hook' conflict. As set out above, there are specific infrastructure measures that have been implemented in the design of the junctions to reduce vehicle turning speeds, improve the physical safety, and safety awareness aspects of these junctions. Section 7.1 of the PDGB recognises the importance of providing the infrastructure in line with international best practices as follows:

The primary conflict for cyclists is with left-turning traffic. On the basis of international best practice, the preferred layout for signalised junctions within the CBC project is the "Protected junction", which provides physical kerb build-outs to protect cyclists through the junction.

As noted above in paragraph a.3, the staging and phasing of the junction operation has taken into account the guidance from international expertise in establishing safe thresholds (<150PCU) for implementing the left turning flashing amber/give way to ahead cyclists scenario. Nine of the fourteen key junctions on the Proposed Scheme have implemented this approach to achieve optimum operational effectiveness including the efficient movement of cyclists. Introducing separate signal phases will increase delay for cyclists at junctions. This arrangement will promote the sustainable mode hierarchy for cyclists at junctions by providing priority to ahead cyclists over turning cars. At each of these junctions the left turning vehicle traffic volumes in these locations are estimated to be less than the 150PCU threshold and similarly low HGV volumes are estimated in line with the principles established by international guidance. In addition to specific signage such as that presented in Figure 39 and Figure 40 of the PDGB, at each of the nine locations a three to five second early start for cyclists is typically provided to further mitigate the potential for the number of interactions with vehicles/cyclists at these locations. The Proposed Scheme has also been subject to Road Safety Audits at different stages that have informed the design development of the Proposed Scheme.

Taking on board the added safety measure to avoid pedestrian and cycle conflicts as set out in paragraph a.2, the left turning safe threshold (<150PCU's) requirement the Junction Type 1-3 have a higher safety standard for pedestrian and cycle users than the equivalent international options advocated.

Separately, the NTA and Dublin City Council will continue to promote the already established driver awareness campaign that seeks to promote driver awareness in line with the Road Safety Authority rules of the road as noted below:

When turning left, or right, all drivers must watch out for cyclists going ahead or turning. When making a turn, watch out for cyclists in front of you or coming up on your left or right. Do not overtake a cyclist

² Vehicle to Passenger Car Unit (PCU) conversion as per TfL Values; Pedal Cycle - 0.2, Motor Cycle - 0.4, Passenger Car/LGV - 1.0, Medium Goods Vehicle (MGV/OGV1) - 1.5, Buses and Coaches - 2.0 and Heavy Goods Vehicle (HGV/OGV2) - 2.3

as you approach a junction if you are turning left or right, as the cyclist may be continuing straight ahead.

2. Why hasn't the NTA used an international standard junction design, which has proven to be effective, such as the Cyclops (Type 4) or Dutch junction on all junctions in this project?

As outlined above, there are, legislative, behavioural and other practical considerations that need to be taken into account when looking at these international examples. Consideration for all of these elements has led to the development of the four junction types described in the PDGB. The PDGB and associated protected junctions have been developed in consideration of the collective principles from international best practice, and in consultation with cycling design experts from the UK, the Netherlands and Denmark for a local Irish context to ensure the safe and effective operation of the junctions, with pedestrian vulnerability as the highest priority.

As outlined above, no two junctions are the same and no one element defines a junction type. The submission has made reference to likening Junction Type 4 to the 'Cyclops' style junction being implemented in the UK. Whilst some of the operational based characteristics of the 'cyclops' style junction are also considered in Junction Type 4 such as parallel and simultaneous pedestrian and cycle movements, there are fundamental differences in these junction types. These fundamental differences relate particularly to pedestrian and cyclists conflicts as described previously.

3. Why was pedestrian crossing distance not included in the Pedestrian Infrastructure Assessment in EIAR Chapter 6 (Appendix A6.4 page 2)?

As set out in Section 5.6 of the PDGB (Appendix A4.1 of the EIAR) and specifically outlined in the Junction Design Report (Appendix A6.3 of the EIAR) for the each junction on the Proposed Scheme, the desirable maximum pedestrian crossing length without providing a refuge island is 19m.

The pedestrian qualitative assessment criteria for junctions is set out in Table 6.3 of the Traffic Impact Assessment Report and further provided in Figure 2.5.11 below. This criteria has been derived from a set of industry standards and guidance listed in Section 3 of the Traffic Impact Assessment Report. Of particular note, the *Directness* criteria aligns to the principles of *DMURS* and *Smarter Travel (2009)* which sets out that designs should allow pedestrians to cross the street in a single direct movement where reasonably practical to do so.

Table 6.3: Pedestrian Junction Assessment Criteria

Aspect	Indicator
Routing	Are pedestrian crossings (signalised or uncontrolled) available on all arms?
Directness	Where crossings are available, do they offer direct movements which do not require diversions or staggered crossings i.e., no or little delay required for pedestrians to cross in one direct movement?
Vehicular speeds	Are there measures in place to promote low vehicular speeds, such as minimally sized corner radii and narrow carriageway lane widths?
Accessibility	Where crossings exist, are there adequate tactile paving, dropped kerbs and road markings for pedestrians (including able-bodied, wheelchair users, mobility impaired and pushchairs)?
Widths	Are there adequate footpath and crossing widths in accordance with national standards?

Figure 2.5.11 Pedestrian Junction Assessment Criteria (Extracted from Table 6.3 of TIA Report)

4. How many proposed junction arms will have longer crossing distances for pedestrians?

Direct comparison of existing and proposed pedestrian crossing lengths is not always a meaningful metric to consider in isolation of the proposed works. For example the Proposed Scheme may require the introduction of new bus lanes and/or new or wider cycle facilities that can impact on a like for like comparison.

As a general principle, a combination of the following measures in conjunction with revised traffic signal phasing have been implemented in the Proposed Scheme in accordance with *DMURS* and the PDGB that will typically serve to reduce pedestrian crossing lengths at all junctions on the Proposed Scheme:

- Removal of left turn slip lanes;
- Reduced carriageway lane widths;
- Introduction of single direct crossings and removal of staggered crossings (where practical);
- Implementation of Junction Type 4 crossing arrangements (where practical).

The following example, as shown in Figure 2.5.12 below, demonstrates how the above principles have resulted in a reduction in pedestrian crossing lengths from footpath to footpath. The Western arm of the R139/ Malahide Road (Northern Cross) junction has approximately 44m long multistage crossing arrangement in the existing arrangement. The Proposed Scheme will reduce the overall crossing distance to 25m whilst also improving the directness of the pedestrian crossings in line with the principles of DMURS and the approach set out in the PDGB, recognising that a single direct crossing at this location is not considered appropriate.

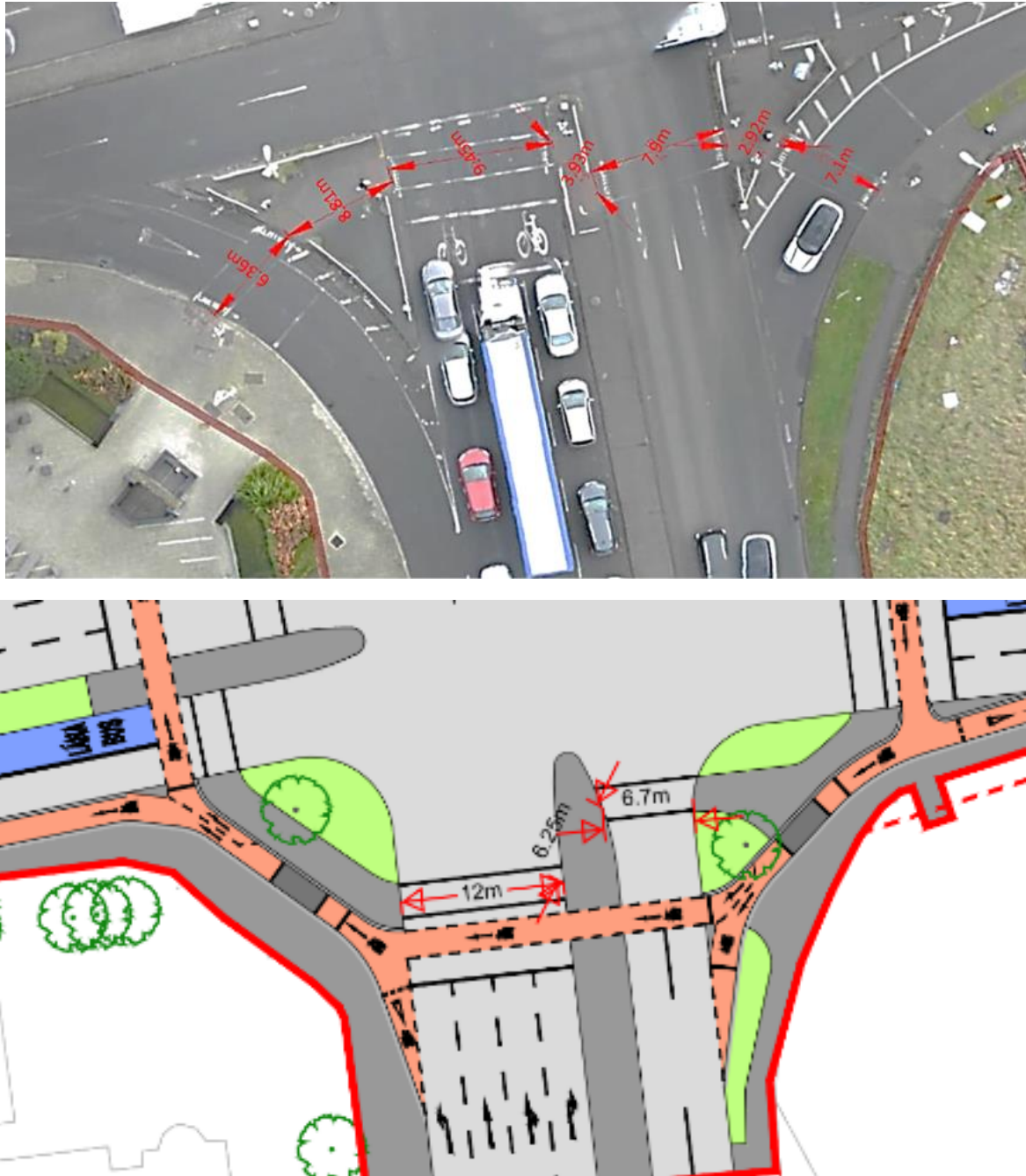


Figure 2.5.12: Existing and Proposed pedestrian crossing arrangements for the western arm of the R139/ Malahide Road (Northern Cross) Junction (~44m vs 25m total)

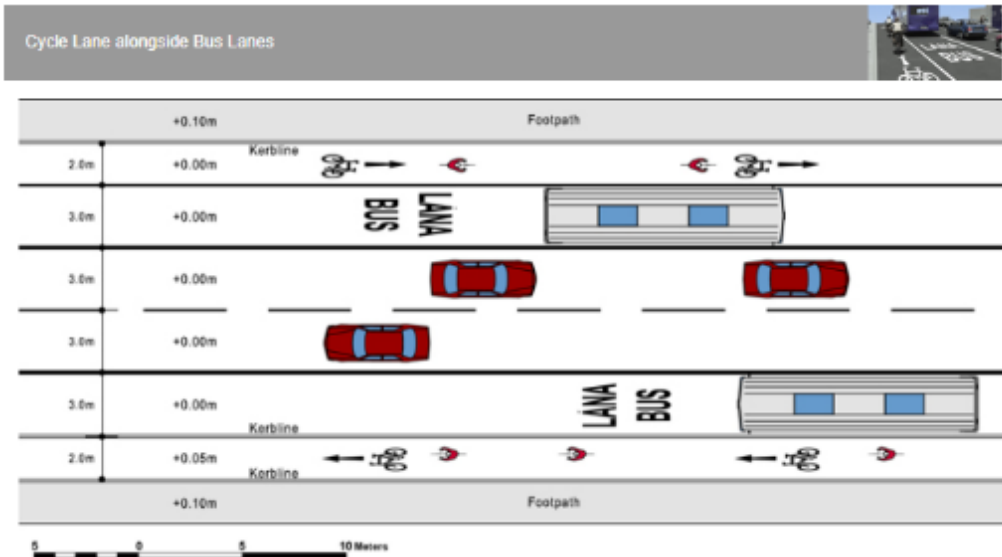
v)b) Green Buffer Space Between Cycle Track and Road – Summary of Issue

The submission has outlined the benefits for providing grassed/landscaped buffers along the Proposed Scheme and requested for them to be implemented between the cycle track and the bus lane.

v)b) Green Buffer Space Between Cycle Track and Road – Response to issue

The NTA notes the comments raised in the submission. The National Cycle Manual provides information in relation to the typical arrangement for cycle lanes adjacent to bus lanes as set out below noting that this arrangement is typically applicable to collector or district distributor roads up to 60km/hr (See extract below in Figure 2.5.13).

The Proposed Scheme provides additional measures including continuous kerb segregated cycle tracks typically 2m wide (this arrangement allows for two-abreast cycling), traffic calming measures and lower speed limits will be reduced to 50km/hr throughout the Proposed Scheme on the Malahide Road. Notwithstanding, the NTA recognises the benefits green buffers can bring and have introduced these elements at various sections in the Proposed Scheme where reasonably practicable to do so. Careful consideration needs to be given when introducing grassed buffers such that a consistent and legible layout can be understood by all road users. Key elements including, available space, entrances, side roads, trees, site grading/levels, drainage and utilities need to be considered, hence the introduction of green buffer spaces may not be suitable at all locations.

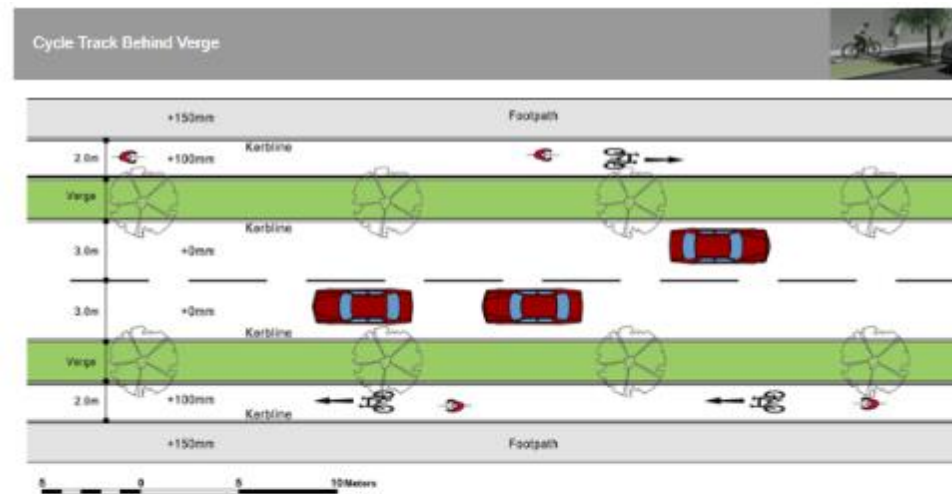


Typical Road Environment

1. Collector or District Distributor, max. speed 60km/h

Characteristics

1. Dedicated cycle lane adjacent to bus lane
2. Reduced frustration, higher QOS for both bus and bicycle modes
3. Bus lane acts as buffer space between cyclists and general traffic



Typical Road Environment

1. Distributor and collector roads with speeds greater than 60km/h

Characteristics

1. Grass or paved verge separating cycle track from carriageway
2. Trees, shrubs & street furniture can be placed within the verge

Figure 2.5.13: Extract from National Cycle Manual Section 4.3.3 and Section 4.3.4

vi) Requested Modifications for Comfort and Inclusion

vi)a) Shared Walking and Cycling Spaces and Crossings – Summary of Issue

The submission notes the following in relation to shared walking and cycling spaces and crossings:

“Pedestrians, cyclists and disability groups all dislike shared spaces that mix walking, wheeling and cycling – this mixing leads to conflict and to people finding these shared spaces confusing and intimidating. Away from the main junctions, all the toucan crossings of the Malahide road (R107) are shared spaces – separate walking and cycling crossing should be provided.”

vi)a) Shared Walking and Cycling Spaces and Crossings – Response to Issue

The NTA notes the request in the submission to provide segregated crossing facilities ‘away from the main junctions’ in lieu of toucan crossings. These crossings are typically referred to as mid-block crossings and have been provided in a number of locations as part of the Proposed Scheme to facilitate access to destinations and to cater for pedestrian and cyclist movements across the main corridor. It is likely that a range of movements will be required at these crossings including:

- U-turn to access a destination back along the path of origin but on the opposite side of the road to travel;
- Access to a destination located in the immediate vicinity of the crossing on the opposite side of the road (e.g. a shop, house, cycle parking);
- Access to a destination located further along the path of travel but on the opposite side of the road (which cyclists could access by dismounting and walking to the ultimate destination).

A toucan crossing will facilitate each of the above movements adequately and safely for all road users, and is preferred to provide a balanced solution to cater for pedestrian and cycle users.

It is noted that dedicated crossings for cyclists, would require a two-way cycle crossing facility to enable similar movements in both directions with a potential for shared surfaces on each side of the crossing to facilitate the movement across the footpath to the key destination access described in last two bullet points above. It is therefore preferred to retain toucan crossings in these locations.

The provision of toucan crossings in such scenarios is set out in Section 7.5 of the PDGB. Figure 28 and Figure 29 of the PDGB provide the two configurations that exist on the Proposed Scheme. Examples of some of scenarios where toucan crossings have been provided on the Proposed Scheme include the following approximate locations/destinations:

- Chainage A3650 (at Buttercup Park);
- Chainage A4400 (at Ayrfield Drive);
- Chainage A5350 (at St Brendan’s Avenue/Park);
- Chainage A5525 (at Coolock Village);
- Chainage A5775 (at St Brendan’s Avenue/Brookville Park);
- Chainage A6250 (at Mornington Shopping area);
- Chainage A6975 (at Maypark) and
- Chainage A8000 (at Nazareth House/Dublin Fire Brigade Training Centre/Mount Temple Comprehensive School).

vi)b) Width of cycle track – Summary of Issue

The submission notes the following in relation to the width of the proposed cycle tracks:

“Cycle tracks should be wide – the wider the better. At the very least, they should be wide enough for cyclists to pass each other comfortably. This is particularly important given that cycle tracks should be inclusive, and allow easy use by cargo bikes, handtrikes and mobility scooters, without impeding others. A standard cycle track of 1.5m may be adequate for commuter cycling (individuals on standard bikes, cycling in single file) but a 2 / 2.25m track facilitates overtaking and allows for non-standard cycles, as well as allowing 2 people to cycle side-by-side eg parents cycling with smaller children or older children cycling to school with friends. Apart from a couple of short narrow sections this is a spacious route and a wide, comfortable cycle track should be easy to accommodate.”

vi)b) Width of cycle track – Response to Issue

The NTA recognises the importance of accommodating the full range of cycles to ensure routes are accessible to all cyclists. The NTA notes the comments raised in the submission and notes that Section 2 of the PDGB outlines the objectives of the design guidance document. Within this section the following statement is made:

“In the approach to cycle infrastructure design, the BusConnects project not only aims to cater for existing cyclists, but more particularly for younger and older cyclists, mobility impaired cyclists and new cyclists as well as those who currently do not cycle but would be prepared to, subject to improved safety and greater cycle infrastructure provision.”

One of the main outcomes of the Proposed Scheme is safe, segregated cycling facilities which are accessible to all along the corridor. As set out in the PDGB and in accordance with the NCM width calculator, the desirable minimum width for a single-direction, with-flow, raised adjacent cycle track is 2.0m, to provide a high Quality of Service and allow for overtaking within the cycle track, as well as to cater for larger cycles. Notwithstanding this aspiration, it is acknowledged that the Proposed Scheme is to be delivered in constrained urban environments, and the delivery of a 2.0m+ wide cycle track may not always be practicable. As such, the cycle track widths have been reduced to typically 1.8m or 1.5m wide where the provision of 2.0m wide cycle tracks is not practicable.

Whilst cycles can come in a range of shapes and sizes (for example standard, tandem, recumbent, cargo, handcycle, wheelchair user tricycle, articulated bikes with additional child trailer or trailer bikes), these cycles are typically less than 1m in width and will be accommodated by the Proposed Scheme.

2.5.7 71 – Development Applications Unit

Overview of submission

The submission outlines the heritage related observations/recommendations under the heading of Nature Conservation.

The submission notes the intention to remove 228m of hedges and 221 trees from treelines. It also states that *‘While the incorporation of 545 trees and 2995m of hedgerow in the landscaping of the proposed development should ensure there will be no long-term loss of biodiversity as a result of the vegetation clearance, the felling of trees and removal of hedges during the bird breeding season which could lead to the destruction of nests, eggs and nestlings, should be avoided.’*

The submission makes the following solitary recommendation:

‘1. That no removal of tree or vegetation shall occur during the main bird breeding season from March to August inclusive.’

Reason: to avoid the destruction of bird nests, eggs and nestlings.’

Response to submission

This specific issue is addressed in EIAR Chapter 12 Biodiversity Section 12.5.1.5.1 Breeding Birds. Under the sub-title Mortality Risk, it sets out that, where feasible, vegetation (e.g. hedgerows, trees, scrub, bankside vegetation and grassland) will not be removed, between the 1st March and the 31st August, to avoid direct impacts on nesting birds. Where the construction programme does not allow this seasonal restriction to be observed, then these areas will be inspected by a suitably qualified ecologist as engaged by the appointed contractor for the presence of breeding birds prior to clearance. Areas found not to contain nests will be cleared within 3 days of the nest survey, otherwise repeat surveys will be required. Vegetation clearance will not commence where nests are present, works will resume when birds have fledged and nests are no longer in use, or an agreement is reached with National Parks and Wildlife Service (NPWS).

2.5.8 73 – Inland Fisheries Ireland (IFI)

Overview of submission

The submission from IFI is a single page, which would appear to be an incomplete submission. It states that that Bus Connects corridors will interact with:

- the Mayne River, a non-salmonid system;
- the Santry River which is also considered non-salmonid; and
- the Tolka estuary, which serves as the natural linkage for species such as salmon, sea trout and eels migrating between freshwater and ocean environments.

It then states that: *'Pollution of the adjacent fresh/estuarine waters from poor on-site construction practices could have a significantly negative impact on the fauna and flora of tis surface water system. A comprehensive and integrated approach for achieving estuary and river protection during construction and operation should be implemented through environmental construction management planning.'*

It goes on to state that: *'All works will be completed in line with the Construction Management Plan (CMP) which ensures that good construction practices are adopted throughout the works period and contains mitigation measures to deal with the potential adverse impacts identified in advance of the scheme.'*

Finally it recommends that *'the "Guidelines on protection of fisheries during construction works in and adjacent to waters" (2016) should be consulted when planning to undertake works near any of the relevant rivers and streams.'*

Response to submission

EIAR Chapter 13 Water assesses the impact of the Proposed Scheme on the surface water environment during both the Construction and Operational Phases. Section 13.3.3 of EIAR Chapter 13 Water sets out that the following Water Framework Directive (WFD) water bodies within the study area are included in the assessment.

- Mayne_010;
- Mayne Estuary;
- Santry_020; and
- Tolka Estuary.

Section 13.4 of EIAR Chapter 13 Water presents potential impacts that may occur due to the Proposed Scheme, both during construction and operation.

Table 13.14 on pages 22 and 23 summaries the potential construction phase impacts on the WFD water bodies in the study area, and the assessment concluded that the significance of effects are:

- Mayne_010; - Imperceptible Short term Adverse
- Mayne Estuary; - No impacts
- Santry_020; - Imperceptible Short term Adverse
- Tolka Estuary. - Imperceptible Short term Adverse

Table 13.15 on pages 22 and 23 summaries the potential operational phase impacts on the WFD water bodies in the study area, and the assessment concluded that the significance of effects are:

- Mayne_010; - imperceptible Beneficial Permanent
- Mayne Estuary; - No impacts

- Santry_020; - imperceptible Beneficial Permanent
- Tolka Estuary. - imperceptible Beneficial Permanent

Section 13.5 of EIAR Chapter 13 Water sets out the measures envisaged to avoid, prevent or reduce any potential significant adverse effects on the environment identified in Section 13.4 and, where appropriate, identify any proposed monitoring of the efficacy of implementing those mitigation measures.

Construction phase mitigation measures are described in section 13.5.2.1. A Surface Water Management Plan (SWMP) has been prepared and is provided in the Construction Environmental Management Plan (CEMP) contained in Appendix A5.1 in Volume 4 of the EIAR.

The SWMP details control and management measures for avoiding, preventing, or reducing any significant adverse impacts on the surface water environment during the Construction Phase of the Proposed Scheme. It will be a condition within the Employer's Requirements that the successful contractor(s), immediately following appointment, must detail in the SWMP how it is intended to effectively implement all the applicable measures identified in this EIAR and any additional measures required pursuant to conditions imposed by An Bord Pleanála to any grant of approval. At a minimum, all the control and management measures set out in the SWMP will be implemented. This includes measures relating to:

- Construction Compound management including the storage of fuels and materials;
- Control of Sediment;
- Use of Concrete;
- Management of vehicles and plant including refuelling and wheel wash facilities (if necessary); and
- Monitoring.

Section 5.4.1.2 of Appendix A5.1 CEMP lists the guidance documents which have been taken into account when preparing the SWMP and the control and management measures relating to surface water management. This includes: *"Guidelines on Protection of Fisheries During Construction Works in and Adjacent to Waters (Inland Fisheries Board (IFB) 2016)"*.

Mitigation for the Operational Phase has been built into the design of the Proposed Scheme, which is outlined in Section 13.4.1.1. No additional mitigation is required.

2.5.9 74 – Irish Water

Overview of submission

The submission states that Irish Water (IW) has no objection in principle to the proposed development and confirms that the NTA has engage with IW Diversions Section. It also states that subject to valid agreement/s being in place, the proposed diversion works and build over works to Irish Water assets can be facilitated.

The submission then requests that the NTA provide detailed design drawings based on site investigation prior to construction commencing and states that the designs will have to incorporate 19 water requirements and 8 waste water requirements, which the submission goes on to list.

Response to submission

The NTA have been engaged since early 2020 in dialogue with Irish Water regarding the Proposed Scheme.

To aid this dialogue the NTA have provided a full set of drawings and a technical summary which outline the diversions necessary to the Irish Water infrastructure in order to achieve the construction of the scheme. These documents were prepared using the record information provided by Irish Water and also incorporate drainage information received from the Local I Authorities. This information was supplemented by a non-intrusive Ground Penetrating Radar (GPR) survey which was carried out to confirm the existence/position of the identified critical infrastructure elements.

The requirements listed by IW in their submission include text agreed with the NTA for Water Infrastructure (requirements 1-16) and additional requirements 17-19. It also includes text agreed with the NTA for Wastewater requirements 1-8.

2.5.10 95 – Dublin City Council

Structure of Response to Submission

Dublin City Council's (DCC) submission comprises 39 pages and is sectionalised numerically. For ease of reference the DCC section numbering and sub-section numbering conventions have been retained throughout the NTA's response as set out in the following paragraphs.

The NTA's response to the submission is set out as follows:

- A. Role of NTA & Liaison
- B. DCC's Support for the Scheme
- C. Certain Observations Raised/Clarification Sought by DCC
 - C1 – Response to Section 2.1 Relevant Planning History
 - C2 – Response to Section 2.2 Policy Context
 - C3 – Response to Section 2.3 Departmental Reports, including reference to the Appendix
 - C4 – Response to Section 2.4 Planning Assessment (sub-sections 2.4.1 to 2.4.11 & 2.5.12)
 - C5 – Response to Section 2.6 Conclusion
 - C6 – Response to Appendix to DCC Submission

Introduction

The Clongriffin to City Centre Core Bus Corridor Scheme (hereinafter referred to as the "Proposed Scheme") within the Dublin City Council area is one of 12 schemes to be delivered under the BusConnects Dublin - Core Bus Corridors Infrastructure Works (hereinafter referred to as the "CBC Infrastructure Works"). The CBC Infrastructure Works is one of the initiatives within the NTA's overall BusConnects Programme.

A - Role of the National Transport Authority (NTA) and Liaison with Dublin City Council (DCC)

For context, the EIAR Chapter 1 Introduction, Section 1.4, Role of the National Transport Authority, of the Clongriffin to City Centre Core Bus Corridor Scheme Environmental Impact Assessment Report (Volume 2 of 4) states:

"The NTA is responsible for the development and implementation of strategies to provide high quality, accessible and sustainable transport across Ireland. The NTA has a number of statutory functions including the following which are relevant to the Proposed Scheme:

- *Develop an integrated, accessible public transport network;*
- *Provide bus infrastructure and fleet and cycling facilities and schemes; and*
- *Invest in all public transport infrastructure.*

Specifically, under Section 44(1) of the 2008 Act (as amended), 'in relation to public transport infrastructure in the GDA, the Authority shall have the following functions:

- a) *to secure the provision of, or to provide, public transport infrastructure;*
- b) *to enter into agreements with other persons in order to secure the provision of such public transport infrastructure, whether by means of a concession, joint venture, public private partnership or any other means; and*
- c) *to acquire and facilitate the development of land adjacent to any public transport infrastructure where such acquisition and development contribute to the economic viability of the said infrastructure whether by agreement or by means of a compulsory purchase order made by the Authority in accordance with Part XIV of the Act of 2000.*

The Board of the NTA, at its meeting on 18 October 2019, considered whether the function of providing the public transport infrastructure comprising of the CBC Infrastructure Works should be performed by the NTA itself under the provisions of Section 44(2)(b) of the 2008 Act. Following consideration, the Board of the NTA decided that the functions in relation to securing the provision of public transport

infrastructure falling within Section 44(2)(a) of the 2008 Act (as amended) in relation to the CBC Infrastructure Works, should be performed by the NTA.

The NTA established a dedicated BusConnects Infrastructure team to advance the planning and construction of the CBC Infrastructure Works, including technical and communications resources and external service providers procured in the planning and design of the 12 Proposed Schemes.”

In early 2019, as indicated by Dublin City Council (DCC) in its submission, a multi-disciplinary corporate team (the DCC BusConnects Liaison Office) was established to provide a liaison role with the NTA. The purpose of this team/office is to effectively manage the communications and act as the primary conduit for information exchange between DCC and the NTA in relation to the BusConnects Programme.

As DCC states in its submission, this dedicated DCC BusConnects Liaison Office has facilitated the exchange of information and engagement with other departments and sections within DCC regarding the design of the Proposed Scheme.

The NTA is grateful for the positive and constructive liaison that has occurred with the DCC BusConnects Liaison Office throughout the design and planning process to date, and through that liaison office with other Departments and Sections within DCC regarding the progression of the Proposed Scheme.

B - DCC's Support for the Scheme

In its submission DCC confirms its support for the Proposed Scheme, and state in their conclusion on page 27 of the submission:

“The Clongriffin to City Centre Core Bus Corridor Scheme is supported and welcomed by Dublin City Council as it will ensure the delivery of a number of key policies and objectives of the Dublin City Development Plan 2016-2022 as well as the draft Dublin City Development Plan 2022-2028.”

DCC further confirms (at page 27 of its submission) that the development of the Proposed Scheme will provide an upgraded and expanded bus network and quality of service together with better quality cycling and pedestrian facilities and DCC acknowledges that these improvements will make it easier for people to access and use public transport. It also acknowledges that the Proposed Scheme will, in turn, 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.

In relation to planning policy, the NTA welcomes the acknowledgement by DCC (at page 10 of its submission) that, in terms of Regional Policy, the Proposed Scheme is supported by the Regional Spatial and Economic Strategy (RSES) and that DCC is of the view that the Proposed Scheme will contribute to, 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, not only seeking an improved and enhanced bus network but also places cycling at the core of its transport objectives.

In relation to the Dublin City Development Plan 2016-2022, the DCC submission (page 6) confirms that the development plan *“recognises the need for an efficient, integrated, and coherent transport network as a critical component of the Development Plan’s Core Strategy”*. It goes on to state *“[t]he City Council supports the improvement of public transport and cycling which will allow for higher density development, thereby creating a more sustainable interaction between land-use and transport.”*

Equally, on page 14 of its submissions, DCC notes that the Proposed Scheme is fundamental to achieving the strategic objectives envisaged in the Clongriffin-Belmayne Local Area Plan and Belmayne and Belcamp Lane Masterplan and the forthcoming Dublin City Development Plan 2022-2028 (SDRA 1), pertaining to: compact and sustainable urban growth; sustainable mobility and permeability; and place making, while significantly contributing towards climate action,

In relation to the EIAR, DCC states (at page 12 of its submission) that *“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”* and they go on to say, also on page 12, that *“the content [of the EIAR] points generally to the development having negligible impact on the existing environment”*.

In relation to the NIS, DCC states (at page 13 of its submission) that the Natura Impact Statement submitted is generally satisfactory in terms of identifying the relevant European sites and the potential adverse impacts on the integrity of designated European sites along the Dublin coastline in view of their conservation objectives. *DCC go on to state in its submission that there is considered to be sufficient distance from the intended route of the bus corridor to SAC and SPA sites, and the avoidance, design requirements and mitigation measures set out in the NIS will ensure that any impacts on the conservation objectives of European Sites will be avoided during the construction and operation of the proposed scheme such there will be no adverse effects on any European Sites.*"

DCC also observes that the Natura Impact Statement objectively concludes that the development will not adversely affect (either directly or indirectly) the integrity of any European Site, either alone or in combination with other plans or projects and there is no reasonable scientific doubt in relation to this conclusion.

In relation to zoning, the NTA notes that DCC sets out the view on page 13 of its submission that, overall, the Proposed Scheme is compatible and consistent with the zoning objectives for the area, being a public service installation.

On page 13 of its submission, in relation to amenities, DCC states:

"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".

In fact, DCC goes on to state (at page 14):

"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".

The Environmental and Transportation Department of DCC set out (at page 14 of its submission) that:

"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".

DCC states further that, *"[t]he 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".* Dublin City Council goes on to state that this will provide better and safer cycling environment and help the bus maintain a steady speed and achieve its journey times.

Also, on the top of page 15 of its submission, DCC states:

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

At page 19 of its submission, DCC Archaeology Department acknowledges that no significant residual archaeological impacts are identified in the EIAR either in the Construction or Operational Stage of the Proposed Scheme and this Department also advises that it has reviewed and concurs with the broad methodology for archaeological monitoring as outlined in the EIAR.

On page 25 of the DCC submission, the City Architects Department welcomes 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. It goes on to state that the 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. This Department also notes that proposals for public realm upgrades, including widened footpaths, high quality hard and soft landscaping contribute towards a safer, more attractive environment for pedestrians are included, and that the Scheme has been developed having regard to relevant accessibility guidance and universal design principles so as to provide access for all users.

C - Certain Observations Raised/Clarification Sought by DCC

While, as is evidenced from the DCC submission itself, and from the extracts from the DCC submission as outlined above, DCC is supportive of the Proposed Scheme and its improvements to public transport and the shift to sustainable mobility, DCC has raised certain queries and observations that the NTA has now considered and responds to below.

These queries and observations are enclosed in Section 2.0 of the DCC submission, (entitled “Description of the Proposed Development”). The queries and observations are included under a number of sub-headings and for ease of reference the DCC sub-section numbering convention has been retained throughout the following paragraphs.

2.0 Description of the Proposed Development

Section 2.1 Relevant Planning History

C1 - Response to Section 2.1

DCC, in this section 2.1 of its submissions, lists six planning applications along, and adjacent to, the Proposed Scheme. The NTA notes that four of the six planning applications listed are identified in the application documentation – namely EIA Volume 4 Appendices Part 1 of 2, 04. A2.1 Appendix 2 Planning Report, Section 1.1.1 as set out below:

- *An application for a Strategic Housing Development application at Site 2, Mayne River Avenue, Northern Cross, Malahide Road, Dublin 17 (ABP planning reference TA29N.307887) was granted in 2020;*
- *An application for a Strategic Housing Development application at Newtown, Malahide Road, Dublin 17 (ABP planning reference TA29N.305943) granted in 2020;*
- *An application for an Aviation Fuel Pipeline from Dublin Port to Dublin Airport (ABP planning reference PL29N.245738) granted in 2016; and*
- *An application for Street Refurbishments along Belmayne Main Street and Belmayne Avenue (DCC planning reference 4214/18).*

The two other planning applications that DCC refer to are:

- a Strategic Housing Development at Clarehall, Malahide Road, Dublin 17 (SHD0007/19) granted in 2019, and
- a Strategic Housing Development at the Former Chivers Factory Site, Coolock granted in 2020.

Both developments were deemed outside of the immediate scheme extents and do not have a significant interface with the Proposed Scheme. The assessment of these types of interfaces are set out in Chapter 21 Cumulative Impacts Table 21.1 Pre-defined Zone of Influence for Cumulative Effects Assessment. Both these proposed developments are outside this Zone of Influence (approx. 600m from the Chivers Site and 100m from the Clarehall Site) and hence are categorised as not having a significant interface. However, the proposed scheme will benefit those developments in terms of providing enhanced overall public transport and cycling connectivity.

Section 2.2 Policy Context

C2 - Response to Section 2.2

The NTA acknowledges the commentary in Section 2.2 of the DCC Submission in relation to Policy Context and notes that it generally aligns with the policy context set out within the application documents namely EIA Volume 4 Appendices Part 1 of 2, 01. A2.1 Report Planning Report for the Proposed Scheme.

Further, some additional observations by DCC over and above those already provided within Table 3.8 of the Planning Report in relation to the Dublin City Development Plan 2016-2022 are welcomed, including that the Proposed Scheme is consistent with Policy MT2 and MT13 of the Development Plan, which sets out the necessity to continue to promote modal shift from private car use towards more sustainable forms of transport such as cycling, walking and public transport, which directly aligns with the Proposed Scheme objectives.

Similarly, it is acknowledged that Policy MT7 and MT23 of the Development Plan have a direct correlation with the Proposed Scheme's objectives given the various improvements to thoroughfares and junctions, the implementation of parts of the Greater Dublin Area cycle network and improved

pedestrian facilities which will provide for the needs of people with mobility impairment and/or disabilities including the elderly and parents with children.

Belcamp Lane

One issue raised in this Section 2.2 by DCC was in relation to Belcamp Lane where DCC advised that it is important that the Proposed Scheme does not preclude *“the future permeability intervention, or the development of the Belcamp Lane lands”*. The NTA can confirm that the Proposed Scheme does not preclude *“the future permeability intervention, or the development of the Belcamp Lane lands”*. This is assessed in the context of the Clongriffin-Belmayne Local Area Plan (CBLAP) and Clongriffin – Belmayne Masterplan.

The EIAR - Section 3.4.1 of the Transport Impact Assessment (Volume 4 Appendices Part 1 of 2, 01. A6.1 Transport Impact Assessment Report) – further recognizes the importance of this masterplan site from a public transport perspective as set out below:

“The Proposed Scheme aligns with the design of the transport network for the masterplan site, and the improvements along the R107 Malahide Road as part of the BusConnects scheme are relied upon to achieve the aim of high-frequency, high quality access to public transport and improved connections of the CBLAP and Clongriffin – Belmayne Masterplan.”

The transport modelling undertaken for the assessment of the Proposed Scheme, includes for the planned population growth in the area as contained within the NTA planning forecasts. The NTA planning forecasts include for the planned development areas (e.g. the CBLAP and Clongriffin – Belmayne Masterplan) and growth assumptions are in line with local authority development plans and controlled to regional planning projections from the Regional Spatial and Economic Strategy (RSES) and the National Development Plan (NDP). This ensures a conservative and reasonable worst-case assessment of the junction capacities and traffic redistribution on the surrounding road network when the Proposed Scheme is operational, particularly the capacity effects at the R139 / R107 Clarehall Junction. The likely effect of the inclusion of the Belcamp Parkway link road would be to reduce congestion at the Clarehall Junction, by facilitating movements to/from the South and West. This would have the effect of reducing the Volume over Capacity ratio at the Clarehall junction and potentially reducing trip redistribution further in the area.

Section 2.3 Departmental Reports (including reference to the Appendix):

C3 - Response to Section 2.3

The NTA responses to Departmental Reports are set out in the following sections including reference, as appropriate, to the submission’s Appendix: *“Departmental Recommendations/Conditions”*. The NTA is grateful for the positive and constructive liaison that has occurred with the DCC BusConnects Liaison Office throughout the design and planning process to date, and through that liaison office with the other Departments and Sections within DCC regarding the progression of the Proposed Scheme.

Section 2.4 Planning Assessment

C4 - Response to Section 2.4

2.4.1. Planning Policy

Response to Section 2.4.1:

Note this is responded to in Section 2.2 above.

2.4.2. Environmental Impact Assessment Report (EIAR)

Response to Section 2.4.2:

In relation to the EIAR, DCC states (at page 12 of its submission) that *“[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” and they go on to say, also on page 12, that “the content [of the EIAR] points generally to the development having negligible impact on the existing environment”*.

2.4.3. Natura 2000

Response to Section 2.4.3:

In relation to the NIS, DCC states (at page 13 of its submission) that the Natura Impact Statement submitted is generally satisfactory in terms of identifying the relevant European sites and the potential adverse impacts on the integrity of designated European sites along the Dublin coastline in view of their conservation objectives. DCC go on to state in its submission that *“[t]here is considered to be sufficient distance from the intended route of the bus corridor to SAC and SPA sites, and the avoidance, design requirements and mitigation measures set out in the NIS will ensure that any impacts on the conservation objectives of European Sites will be avoided during the construction and operation of the proposed scheme such there will be no adverse effects on any European Sites.”*

DCC also observes that the Natura Impact Statement objectively concludes that the development will not adversely affect (either directly or indirectly) the integrity of any European Site, either alone or in combination with other plans or projects and there is no reasonable scientific doubt in relation to this conclusion.

2.4.4. Zoning and other designations

Response to Section 2.4.4:

In relation to zoning, the NTA notes that DCC sets out the view on page 13 of its submission that, overall, the Proposed Scheme is compatible and consistent with the zoning objectives for the area, being a public service installation.

2.4.5. Impact on amenity

Response to Section 2.4.5:

On page 13 of its submission, in relation to amenities, DCC states:

“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”.

DCC goes on to state (at page 14):

“Once complete, the proposed scheme will create attractive, functional and accessible places for people alongside the core bus and cycle facilities which will enhance the amenities of the area”.

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

Response to Section 2.4.6:

In regard to the Clongriffin-Belmayne Local Area Plan and Belmayne and Belcamp Lane Masterplan and the forthcoming Dublin City Development Plan 2022-2028 (SDRA 1) the EIAR Section 3.4.1 of the Transport Impact Assessment (Volume 4 Appendices Part 1 of 2, 01. A6.1 Transport Impact Assessment Report) recognizes the importance of this masterplan site from a public transport perspective as set out below:

“The Proposed Scheme aligns with the design of the transport network for the masterplan site, and the improvements along the R107 Malahide Road as part of the BusConnects scheme are relied upon to achieve the aim of high-frequency, high quality access to public transport and improved connections of the CBLAP and Clongriffin – Belmayne Masterplan.”

Consequently, the NTA confirms that the Proposed Scheme does not preclude development of the Belcamp Lane Lands, as envisaged in current and forthcoming Dublin City Development Plan 2022 - 2028.

2.4.7. Environment and Transportation Department Comments

Response to Section 2.4.7 General Comments:

The Environmental and Transportation Department of DCC set out (at page 14 of its submission) that:
“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”.

DCC states further that:

“[t]he 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”.

Dublin City Council goes on to state that this will provide better and safer cycling environment and help the bus maintain a steady speed and achieve its journey times.

Response to Section 2.4.7.1. Traffic Department (including reference to the Appendix):

On the top of page 15 of its submission, DCC states:

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

The Department acknowledges that the modelling work, which was carried out on the corridor of the real-life operation of a full corridor management system using an adaptive traffic control system, allows for a firm basis for how the corridor can be evaluated and to determine its benefits. As set out in the EIAR Volume 2 - Main Chapters - Section 6.4.6.3 of Chapter 6 Traffic and Transport, the micro-simulation modelling demonstrates that bus journey times will improve by between 20% and 23% during the AM and PM Peak hours of the 2028 Opening and 2043 Design Year. On an annual basis this equates to 4,500 hours of bus vehicle savings in 2028 and 4,300 hours in 2043.

Similarly, bus network resilience is a key performance criteria as set out in the EIAR Section 6.4.6.2.7.2 of Chapter 6 Traffic and Transport wherein the Proposed Scheme was tested with an additional 10 buses per hour (from 25 to 35) at the busiest section. As can be seen from Table 6.40 and Diagram 6.25 of the above referenced chapter, the results indicate that a high level of journey time reliability is maintained. This highlights the benefit that the Proposed Scheme infrastructure improvements can provide in protecting bus journey time reliability and consistency, as passenger demand continues to grow into the future.

The approach to incorporating the SCATS (Sydney Coordinated Adaptive Traffic System) bus priority measures is set out in Section 4.12.1 and Section 12.10.3 of the Preliminary Design Report in the Supplementary Information. Through the very positive and constructive liaison with the DCC BusConnects Liaison Office throughout the design and planning process DCC's Traffic Department is confirming that 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 facilitate improved corridor operation. This digital infrastructure along with the proposed civil infrastructure combine for the Proposed Scheme to meet its objectives.

NTA notes that DCC's Traffic Department recognize that *“NTA is taking over the role of the Road Authority for the purposes of obtaining planning permission for the corridors and that the subsequent construction of the corridors will be undertaken directly by the NTA via their contractors”.*

The NTA notes the additional comments from the Traffic Division (Department) provided in the Appendix. The NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Traffic Division additional comments provided in the Appendix as these matters were the subject of extensive liaison throughout the design development process including consideration of the traffic management equipment that is necessary for the safe and

efficient operation of this Public Transport corridor, and including all traffic signal equipment, and the relevant DCC specification. NTA is aware of, and acknowledges, the important role of the relevant DCC maintenance contractor, and their continued role on both the existing and new traffic signals.

2.4.7.2. Roads Department

Response to Section 2.4.7.2 (including reference to the Appendix):

Movement Hierarchy

In regard to Movement Hierarchy the NTA is satisfied that the Proposed Scheme pedestrian-movement initiatives are following best-practice and are enhancing the facilities for pedestrians/ users with disabilities. As referenced in the EIAR Section 3.2.3 of the Traffic Impact Assessment Report (Volume 4 Appendices Part 1 of 2, 01. A6.1 Transport Impact Assessment Report), the recently published National Investment Framework for Transport in Ireland (NIFTI) sets out a hierarchy of travel modes to be accommodated and encouraged when investments and other interventions are made. Sustainable modes, starting with active travel (walking, wheeling and cycling) and then public transport, will be encouraged over less sustainable modes such as the private car. This aligns with the core objectives of the Proposed Scheme.

As set out in the EIAR Volume 2 - Main Chapters, Diagram 6.1 and Diagram 6.3 of Chapter 6 Traffic & Transport, people movement is a key design philosophy that underpins the objectives of the Proposed Scheme. As such, a multifaceted approach has been undertaken to assess the people movement throughout the Proposed Scheme. Section 3.2.5 of the Traffic Impact Assessment Report and Section 5.4.4.2 and Appendix A6.3 Junction Design Report (Volume 4 Appendices Part 1 of 2) demonstrate that each junction along the Proposed Scheme has been designed to be consistent with the National Cycle Policy Framework to accommodate a minimum 10% cycle mode share in terms of people movement capacity at each junction. This assessment also quantifies the theoretical people movement capacity by walking, bus, and car at each junction.

Diagram 6.7 of Chapter 6, conveys the positive impact that the Proposed Scheme has on modal share in the direct study area as a result of its implementation, using the weighted average number of people moved by each mode (Car, Bus, Active Modes). The NTA Eastern Regional Model (ERM) and Local Area Model (LAM) modelling indicates a corridor level reduction of 30% in the number of people travelling by car, an increase of 24% in the number of people travelling by bus and an increase of 93% in people walking or cycling along the Proposed Scheme during the 2028 AM Peak Hour assessment. Similarly Diagram 6.8 of Chapter 6 indicates a reduction of 24% in the number of people travelling by car, an increase of 29% in the number of people travelling by bus and an increase in 83% in the number of people walking or cycling along the Proposed Scheme during the 2028 PM Peak Hour assessment.

Ensuring Pedestrian Priority

In regard to Ensuring Pedestrian Priority additional physical interventions along the Proposed Scheme, such as enhanced/additional pedestrian crossings, raised table side entry treatments, and enhanced cycling infrastructure, have been assessed in the EIAR (Volume 4 Appendices Part 1 of 2, Chapter 6 Traffic and Transport Appendices) Appendix 4 and summarised in Section 8 of the Traffic Impact Assessment Report and Section 6.4.6.1.7 of the Volume 2 - Main Chapters Chapter 6 Traffic & Transport. These interventions, which form part of the Proposed Scheme, further enhance the movement hierarchy emphasis in line with the Proposed Scheme Objectives.

Overall, the Proposed Scheme will provide an average increase in footway area for pedestrians of 26% inbound and 14% outbound across the corridor compared to the Do Minimum scenario. The Proposed Scheme will increase the number of controlled pedestrian crossings from 36 in the Do Minimum to 52 in the Do Something scenario, equating to a 70% increase. Additionally, there will be an increase in the number of raised table crossings on side roads from 9 in the Do Minimum to 31 in the Do Something scenario, equating to a 244% increase.

The NTA welcomes DCC's comments in relation to the importance of considering the pedestrian/cyclist interaction at bus stops and notes that the EIAR Chapter 4, Proposed Scheme Description Appendix A4.1_ Preliminary Design Guidance Booklet (PDGB) for BusConnects Core Bus Corridor Section 11, sets out the key measures to address the concerns raised in relation to vulnerable users at these locations which is further elaborated in Section 4.13.2, 4.13.2.3 of the Preliminary Design Report in the

Supplementary Information. These details were developed as a result of direct consultation between the NTA and representative mobility groups.

These measures will reduce the potential for conflict between pedestrians, cyclists and stopping buses by deflecting cyclists behind the bus stop, thus creating an island area for boarding and alighting passengers. On approach to the bus stop island the cycle track is intentionally narrowed with yellow bar markings also used to promote a low-speed single file cycling arrangement on approach to the bus stop. Similarly, a 1 in 1.5 typical cycle track deflection is implemented on the approach to the island to reduce speeds for cyclists on approach to the controlled pedestrian crossing point on the island. To address the potential pedestrian/cyclist conflict, a pedestrian priority crossing point is provided for pedestrians accessing the bus stop island area. At these locations a 'nested Pelican' sequence similar to what has been provided on the Grand Canal Cycle Route will be introduced so that visually impaired or partially sighted pedestrians may call for a fixed green signal when necessary and the cycle signal will change to red. Where the pedestrian call button has not been actuated the cyclists will be given a flashing amber signal to enforce the requirement to give way to passing pedestrians. A 1:20 ramp is provided on the cycle track to raise the cycle track to the level of the footpath/island area onto a wide crossing. Suitable tactile paving is also provided at the crossing point in addition to a series of LED warning studs provided at the crossing location which are actuated by bus detector loops in the bus lane. The exit taper for the bus stop has been nominated at 1 in 3 to provide for a gradual transition to the cycle track.

Similarly, Section 6 of the PDGB sets out the key design measures considered for on street parking interactions. Where parallel parking spaces are provided alongside a cycle track, a buffer must be provided to allow space for opening car doors. This buffer should be a minimum of 0.75m in width. (The buffer strip may encroach into the cycle track with localised narrowing where space is confined subject to a minimum 1.5m clear width). Examples where buffer strips have been included in the Proposed Scheme are provided on the General Arrangement Plans including the following locations:

- *Chainage A3100 - outbound on street parking on Malahide Road*
- *Chainage A5050 – revised parking arrangement on Brookville Park*
- *Chainage A5350 – revised taxi stand and parking arrangement on Malahide Road near Coolock Village*
- *Chainage A6200 – revised parking arrangement on Malahide Road near Mornington Grove*
- *Chainage A7650 – revised parking arrangement on Malahide Road near Donnellycarney Road*

Awareness, Education and Behavioural Change Programme

The NTA notes DCC's request for an Awareness, Education and Behavioural Change Programme in the context of the Proposed Scheme. The aim and objectives of the Proposed Scheme is to provide enhanced walking, cycling and bus infrastructure on this key access corridor in the Dublin region, which will enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor (Reference **Chapter 1 Introduction, Section 1.2 Aim and Objectives**, of the **Clongriffin to City Centre Core Bus Corridor Scheme Environmental Impact Assessment Report, Volume 2 of 4**). The aim and objectives are not unique to the CBC Infrastructure Works and many Active Travel projects are currently processing similar infrastructure upgrades across most, if not all, local authority jurisdictions.

The need for a communications programme related to sustainable transport promotion is outside the scope of a singular project and would, instead, be likely to have a national or regional focus. It can be noted that the Draft Greater Dublin Area Transport Strategy 2022-2042, referenced in Section 2.3.4.3 of Chapter 2 (Need for Proposed Scheme) of the Clongriffin to City Centre Core Bus Corridor Scheme Environmental Impact Assessment Report, Volume 2 of 4, sets out behavioural change measures that are intended to be implemented across the GDA, including sustainable transport initiatives, residential travel planning and the expansion of Smarter Travel Workplaces and Campuses Programme plus the Green Schools Programme. These commitments reflect measures already contained in the current Transport Strategy for the Greater Dublin Area 2016 – 2035 and in other national policies. The NTA anticipates undertaking these measures, in co-operation with DCC, and other local authorities, which will deliver the awareness, education and behavioural change programme suggested by DCC.

Impact on Loading and Servicing

The NTA notes DCC's comments in relation to Impact on Loading and Servicing and the challenge to balance a wide range of competing demands with public transport, pedestrians, cyclists, the private car

and the functional and servicing needs of the city economy whilst ensuring the city remains a vibrant, attractive and accessible area for all.

This challenge directly correlates to the Proposed Scheme objectives as set out in Section 1.2 of Chapter 1. The 15-Minute City policy QHSN10 set out in Chapter 5 of the forthcoming Draft Dublin City Development Plan 2022-2028 is also supported by the Proposed Scheme objectives. Movement of people is a core design philosophy of the Proposed Scheme as described in the EIAR Volume 2 - Main Chapters, Chapter 6 Traffic & Transport, which is centered around positioning active modes and public transport at the top of the modal hierarchy, in line with the principles of the National Investment Framework for Transport in Ireland (NIFTI). Improvements to the urban realm, pedestrian and cycle infrastructure between urban centres and neighbourhoods along Proposed Scheme including Ayrfield, Coolock, Artane, Donnycarney, Marino, Fairview will benefit from the 15-Minute City principles.

The assessment of impacts on loading and parking for the Proposed Scheme is set out in the EIAR Chapter 6 Traffic and Transport, Appendix A6 Traffic Impact Assessment Report and summarized in Chapter 4 Proposed Scheme Description and Chapter 10 Population.

Section 4.6.11 of Chapter 4 summarizes the changes to the parking and loading provisions along the Malahide Road as a result of the Proposed Scheme. This will result in impacts on commercial and residential parking in this area which are report in the above referenced section as follows:

- *“In the Northern Cross area, existing access locations to car parks of businesses will be modified by the new scheme;*
- *In the Coolock area, the Proposed Scheme designates residential parking which is expected to reduce the amount of informal parking that obstructs pedestrians and cyclists;*
- *In the Artane area customer parking will be reduced from 7 adjacent parking spaces, 1 disabled parking space and 10 informal parking spaces across the road to 5 parking spaces and 1 disabled parking space in a designated parking area adjacent to the commercial units;*
- *In the Donnycarney area, 11 informal residential and commercial parking spaces will be replaced with 6 designated parking spaces; and*
- *14 designated paid parking spaces will be removed along the Malahide Road at the junction to Marino Mart which serves businesses along the road.”*

As set out in the Traffic Impact Assessment Report under Section 6.2.2.1.5.4 and 6.2.2.1.7, the Proposed Scheme will formalise the parking arrangements to improve facilities for pedestrians and cyclists. Given the availability of equivalent types of parking along adjacent streets within 200m of these locations (and typically within under 100m), the overall impact of this loss of parking is considered to have a Negative, Moderate and Long-term effect between Gracefield Road to Marino Mart / Fairview – Malahide Road and a Negligible and Long-term effect between Mayne River Avenue to Gracefield Road along the Proposed Scheme. This moderate effect is considered acceptable in the context of the aim of the Proposed Scheme, to provide enhanced walking, cycling and bus infrastructure on this key access corridor.

The Proposed Scheme will also increase the number of disabled parking spaces as set out in section 6.4.6.1.7.4 of Chapter 6 Traffic and Transport.

Similarly, the EIAR Volume 4 Appendices Part 2 of 2 Appendix A10.2 The Economic Impact of the Core Bus Corridors, identifies improved commercial opportunities once the new infrastructure is in place with increased walking and cycling and the evidence shows that any loss of business through less customers arriving by car is more than compensated for by increased numbers of customers arriving by more sustainable modes of transport.

Through the very positive and constructive liaison relationship with the DCC BusConnects Liaison Office throughout the design and planning process there has been consultation with the DCC Roads Department in regard to necessary changes to the Pay and Display parking and associated infrastructure to ensure adequate set down/loading for potentially impacted commercial units. As set out above, the design process has balanced the competing needs to achieve the Proposed Scheme objectives. The NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Roads Department inputs regarding Pay and Display parking and associated infrastructure for set down/loading for potentially impacted commercial units as these matters were the subject of extensive liaison throughout the design development process.

Impact on Car Parking

Under the heading Impact on Car Parking, the NTA acknowledges DCC's Roads Department acceptance that the majority of spaces lost as a consequence of the Proposed Scheme are informal on street residential spaces where in some instances, haphazard perpendicular parking currently occurs, and the Proposed Scheme will serve to regularise some of this informal parking. Alternative spaces within reasonable distances (c. 100-200 metres) are noted by DCC as being available.

NTA acknowledges the comments raised by DCC Roads Department in relation to the provision of a 3 metre by 5 metre footprint for offstreet parking in driveways/gardens. The approach to considering the accommodation works in these areas are set out in the Supplementary Information section of the planning application documentation under Section 13.5 of the Preliminary Design Report which has considered the DCC 'Parking Cars in Front Gardens Advisory Booklet' that also outlines the 3m x 5m footprint area similar to Appendix 5 of the forthcoming Draft City Development Plan 2022-2028. As noted, the Compulsory Purchase Order (CPO) Deposit Maps indicate an overall land take requirement for the proposed scheme and in many circumstances this land take will have limited impact on the existing functional parking/maneuvering area due to existing landscaping features that boarder the boundary walls in many circumstances. Section 13.5 of the Preliminary Design Report outlines the approach to maintaining boundary treatment character as well as accommodating sight lines and maneuverability. This is also reflected in the EIAR Sections 5.3.1, 5.3.2 and 5.5.2.1 of Chapter 5 Construction and specifically assessed in Sections 17.4.1.3, 17.4.3.2.8 and 17.4.4.1.11 of Chapter 17 Landscape (Townscape) & Visual which notes that overall, there would be a relatively small loss of private / garden area which will result in a partial loss of landscape amenity space, but there would be no notable change to the key characteristics of these properties.

The NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Roads Department inputs regarding off-street parking within the curtilage of a dwelling as these matters were the subject of extensive liaison throughout the design development process.

2.4.7.3. Public Lighting Department Comments and Recommended Conditions

Response to Section 2.4.7.3 (including reference to the Appendix):

Through the very positive and constructive liaison relationship with the DCC BusConnects Liaison Office throughout the design and planning process there has been consultation with the Public Lighting Department in regard to the design process to all the various different elements including the required light level design and the relevant EN certification.

This includes awareness that a small section of the Proposed Scheme route has street lights that are mounted on ESB Networks Infrastructure, and that 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.

This also includes acknowledgement that, where works are being carried out in areas that remain open for public use, e.g. to facilitate the continued movement of vehicles and pedestrians, then the route will be lighted at all times during night time hours.

The NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Public Lighting Department inputs regarding the required light level design and the relevant EN certification as these matters were the subject of extensive liaison throughout the design development process.

2.4.7.4. Environmental Protection Division Comments and Recommended Conditions

Response to Section 2.4.7.4 (including reference to the Appendix):

Through the very positive and constructive liaison relationship with the DCC BusConnects Liaison Office throughout the design and planning process there has been consultation with the DCC Environmental Protection Division in regard to the need for Sustainable Environmental Infrastructure as part of the development of the Proposed Scheme.

The NTA has, in consultation with DCC, followed the principles of integrating Sustainable Urban Drainage Systems with all other environmental aspects of the Proposed Scheme using best practice solutions appropriate to the Proposed Scheme. This has included consideration of a softer engineered approach as applicable to manage surface water at source as a greener, more environmentally effective approach for managing storm water. Chapter 13 Section 13.4.1.1 outlines the key design principles for the proposed surface water management design for the scheme.

The design of the Proposed Scheme has taken account of the requirement under the EU Water Framework Directive to protect and improve water quality in all waters, including surface waters. This includes recognition that the surface water drainage network impacted by the Proposed Scheme outfalls to a number of protected waterbodies that are identified as Priority Areas for Action under the Water Framework Directive's 2nd and 3rd River Basin Management Plans, and that these contiguous waterbodies, for example the River Santry & Lower Tolka Estuary, are protected waterbodies under Article 4 of the Water Framework Directive. To support our achievement of the legislative obligations the Proposed Scheme is designed to ensure no deterioration of the status of any waterbody to which it is contiguous with downstream and will not jeopardise the attainment of good ecological and good surface water chemical status.

The NTA is aware that DCC has initiated the River Santry Restoration and Greenway Project and can confirm that the Proposed Scheme will not impact on the achievement of this environmental project's objectives. The EIAR and NIS for the Proposed Scheme has carried out the necessary assessment in regard to the status of any waterbody to which it is contiguous with downstream, as per Appendix 13/1 of Volume 3 of the EIAR and Appendix V of the Natura Impact Statement.

In regard to the Recommendations/Conditions of the Environmental Protection Division set out in the Appendix NTA is satisfied as set out above that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Environmental Protection Division inputs regarding criteria and processes as these matters were the subject of extensive liaison throughout the design development process.

2.4.8. Air and Noise Pollution Unit Comments

Response to Section 2.4.8 (including reference to the Appendix):

In regards to the recommendation of the Air and Noise Pollution Control Unit relating to the consideration of the potential for increase air quality and noise issues within the EIAR, these issues are fully addressed in Chapter 7 and 9 in Volume 2 of the EIAR. These chapters consider the impacts on Air Quality and Noise/ Vibration during both the construction and operational stage of the scheme.

The NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Air and Noise Pollution Control Unit inputs regarding the Construction Environmental Management Plan (located in Volume 4 Appendix 5.1) submitted with the application and the Unit's Good Practice Guide for Construction and Demolition as these matters were the subject of extensive liaison throughout the design development process.

2.4.9. Archaeology Department Comments

Response to Section 2.4.9 (including reference to the Appendix):

At page 19 of its submission, DCC Archaeology Department acknowledges that no significant residual archaeological impacts are identified in the EIAR either in the Construction or Operational Stage of the Proposed Scheme and this Department also advises that it has reviewed and concurs with the broad methodology for archaeological monitoring as outlined in the EIAR.

The NTA notes the recommendation set out in the Appendix by the Archaeology Department to appoint a Project Archaeologist and Section 15.5.1.1 of Chapter 15 of the EIAR sets out that:

"The NTA will procure the services of a suitably-qualified archaeologist as part of its Employer's Representative team administering and monitoring the works. The appointed contractor will make

provision to allow for archaeological monitoring, inspection and excavation works that may arise on the site during the Construction Phase.”

2.4.10. Conservation Department Comments

Response to Section 2.4.10 (including reference to the Appendix):

NTA acknowledges that DCC’s Conservation Department welcomes the comprehensive assessment on Architectural Heritage (Chapter 16 and Appendix 16) submitted as part of the EIAR, and that the Department notes the comprehensive assessment of the impact of the Proposed Scheme on the architectural heritage, streetscape and urban environment generally and welcomes the proposed mitigation measures across the scheme.

The NTA acknowledge the comments raised by the Conservation Section and are satisfied that they are addressed as set out in the EIAR as follows.

Protected Structures/proposed Protected Structures

In regard to Protected Structures/proposed Protected Structures and their setting milestones impacted by the Proposed Scheme have been identified in the EIAR Volume 2 - Main Chapters Table 16.15 of Chapter 16 Architectural Heritage and further presented in Volume 4 Appendices Part 2 of 2 Appendices A16.1-A16.3 Architectural Heritage, Appendix A16.3 Section 1.6.3. Chapter 16 Architectural Heritage, Section 16.5.1.4.2 of the EIAR sets out the proposed mitigation measures during the construction phase:

“Recording is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor and in accordance with the methodology provided in Appendix A16.3 in Volume 4 of this EIAR.”

Table 16.7 outlines the locations of the Protected Structures along the Proposed Scheme which includes the referenced RPS 4852-3 houses at 62 and 64 Malahide Road. The impact of the proposed works at this location is set out in section 16.4.3.1 which notes that the current boundary is not the original and the railings, gates and capping stones have been previously replaced with good quality replicas and vehicular entrances have been added. As set out in Section 17.4.4.1.11 of Chapter 17 Landscape (Townscape) & Visual, the new boundary treatment will be reinstated at setback location. Overall, there would be a relatively small loss of private / garden area which will result in a partial loss of landscape amenity space, but there would be no notable change to the key characteristics of these properties.

Table 16.7 also includes the referenced RPS 4855 (Mount Temple Gate Lodge) and RPS 4893-4915 (1-25 Marino Crescent). As set out in Section 16.4.3.1 indirect physical Construction Phase impacts are anticipated in the remaining three locations, where protected structures share a boundary with the Proposed Scheme. For example, At the Mount Temple Gate Lodge, low sensitivity architectural heritage cut granite kerbing has been identified as set out in Section 1.6.4 of Appendix A16.3 and Table 16.16 of Chapter 16 which will be monitored and protected through the construction phase.

Buildings and other non-Protected Structures

In regard to the Buildings and other non-Protected Structures (post boxes/milestones etc) included in the National Inventory of Architectural Heritage (NIAH) NTA recognises the importance of the siting of bus stops in the area of the Church of our Lady of Consolation (NIAH 50130252), as noted on the Volume 3 – Figures, Chapter 4 Proposed Scheme Description, 2. General Arrangement Drawing sheet number 17 of 21, and Volume 4 Appendices Part 1 of 2, Table 6.16 of the Transport Impact Assessment Report. The Proposed Scheme plans for the existing inbound bus stop 664 at Chainage A7375 and existing bus stop 4382 at Chainage A7375 locations are to be retained. NTA confirms that the bus stops as shown are at the correct existing locations.

In regard to the 20-36 Malahide Road (NIAH 50120095) NTA recognises the importance of retaining the character of the streetscape along the Proposed Scheme. As set out in Chapter 17 Landscape (Townscape) & Visual, Section 17.4.4.1.11 the impacted properties at the terrace of 9 houses at 20-36 (even nos.) Malahide Road have been listed and noted that there would be no notable change to the key characteristics of these properties.

In regard to the Post Boxes (NIAH 50130246,50030291 & 50120091) NTA recognises the importance of protecting these structures during construction. Their locations are shown on the EIAR Volume 3 – Figures, Chapter 16 Architectural Heritage Figure 16.1 as well as being listed in Chapter 16 Architectural Heritage Table 16.13. As set out in Chapter 16 Architectural Heritage Section 16.5.1.4.1 the mitigation is for recording, protection and monitoring prior to and during the Construction Phase. Recording is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor and in accordance with the methodology provided in Volume 4 Appendices Part 2 of 2, Appendices A16.1-A16.3 Architectural Heritage, Appendix A16.3.

In regard to the Former Electricity substation Malahide Road/Clontarf Road (NIAH 50120122) NTA recognises the importance of protecting this structure during construction. As set out in Chapter 16 Architectural Heritage, Section 16.3 this ESB sub station was built c.1895 to facilitate the electrification of the tram service on the Malahide Road. This structure is identified in Chapter 16 Architectural Heritage Table 16.9, and illustrated in Volume 4 Appendices Part 2 of 2, Appendices A16.1-A16.3 Architectural Heritage, Appendix A16.2, Chapter 16 Architectural Heritage, Section 16.4.4.2 and in Volume 3 – Figures, Chapter 16 Architectural Heritage, Figure 16.1.

As set out in the EIAR Volume 2 – Main Chapters Chapter 16 Architectural Heritage, Section 16.5.1.2 the potential for damage of sensitive fabric during construction has been identified and the mitigation is for recording, protection and monitoring of the sensitive fabric prior to and for the duration of the Construction Phase. Recording, overseeing of protective measures and monitoring is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor, in accordance with the methodology provided in Volume 4 Appendices Part 2 of 2, Appendices A16.1-A16.3 Architectural Heritage, Appendix A16.3.

In regard to Marino Health Centre (NIAH 50120063) NTA has addressed the issue of a new bus stop at this location. This structure is identified in the EIAR Volume 2 – Main Chapters Chapter 16 Architectural Heritage, Table 16.9, and illustrated in Volume 4 Appendices Part 2 of 2, Appendices A16.1-A16.3 Architectural Heritage, Appendix A16.2, Chapter 16 Architectural Heritage, Section 16.4.4.2 and in Volume 3 – Figures, Chapter 16 Architectural Heritage, Figure 16.1. Section 16.4.4.2 of Chapter 16 notes that *a new bus-shelter will be positioned in front of the Marino Health Centre (NIAH 50120063). The building is of Medium sensitivity. It is well set back from the carriageway behind a well-established area of grass and trees which will not be impacted by the Proposed Scheme. The magnitude of impact is Negligible.*

Structures on the Dublin City Industrial Heritage Record Survey

In regard to Structures on the Dublin City Industrial Heritage Record Survey (DC/HR) NTA has addressed the issue of monitoring of the works at Coolock Bridge (DC/HR 15 13 009). Additional background information in relation to Coolock Bridge is set out in the EIAR Volume 2 – Main Chapters Chapter 16 Architectural Heritage, Section 16.3.1.5.1 and it has also been identified in Section 16.3.1.8 as an Industrial Heritage Site of Local importance and Low Sensitivity. The Bridge is also identified in Chapter 15 Archaeological & Cultural Heritage, Table 15.5 as an Industrial heritage site. The construction mitigation measures for this location are set out in Section 15.5.1.3.1 which notes the following:

Archaeological monitoring (as defined in section 15.5.1.1) under licence will take place, where any preparatory ground-breaking or ground reduction works are required (as defined in section 15.4.1)

The possibility to disturb intact archaeological layers and material at this location is identified in the EIAR and licensed archaeological excavation, in full or in part, of any identified archaeological remains (preservation by record) or preservation in situ will be undertaken as set out in Section 15.5.1.3.1.

In regard to Donnycarney Bridge (DC/HR 18 04 010) NTA has addressed the issue of monitoring of the works at Donnycarney Bridge. Additional background information in relation to Donnycarney Bridge (historically referred to as the Scurloges Bridge) is covered in Chapter 15 Archaeological & Cultural Heritage, Section 15.3.1.6 and Section 15.3.3.2 which notes the following:

“There are no visible surface traces of the earlier bridge and only the north parapet wall survives of the late 19th century structure (the river is now culverted). Archaeological monitoring at this site during the excavation of a pipeline trench in the road in 2012 revealed no archaeological features or deposits (Section 15.3.3.4).”

Section 3.3.3.4 continues with the following commentary in relation to the 2012 excavation findings:

“The overburden that formed the road surface was 0.3m - 0.4m thick and generally overlay a yellow grey silt clay, which formed the natural subsoil. Nothing of archaeological significance was observed during the excavation of the pipeline through the road in proximity to the recorded archaeological site.”

As set out in Chapter 15 Archaeological & Cultural Heritage, Section 15.5.1.1 the NTA will procure the services of a suitably-qualified archaeologist as part of its Employer’s Representative team administering and monitoring the works and the appointed contractor will make provision to allow for archaeological monitoring, inspection and excavation works that may arise on the site during the Construction Phase.

In regard to Electricity substation (DC/HR 18 04 012) see above response regarding the Former Electricity substation Malahide Road/Clontarf Road (NIAH 50120122) .

Architectural Conservation Areas and Conservation Areas

In regard to Architectural Conservation Areas and Conservation Areas NTA acknowledges DCC Conservation Department observation that no historic boundaries or features within the Marino Casino ACA will be impacted by the proposed works.

Similarly the proposed works in Marino along Haverty Road, Carleton Road and St. Aidan’s Park Road will complement the Z2 classification to protect and/or improve the amenities of residential conservation areas.

In relation to the impacts on boundaries as a result of the proposed widening, the details of these have been set out and assessed in the EIAR in Volume 2 - Main Chapters, Chapter 17 Landscape (Townscape) & Visual Section 17.4.4.1.11 as follows:

“The new boundary treatment will be reinstated at setback location. Overall, there would be a relatively small loss of private / garden area which will result in a partial loss of landscape amenity space, but there would be no notable change to the key characteristics of these properties.”

A summary of the potential operation stage impacts is provided in Table 17.8 of Chapter 17 of the EIAR.

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

In regards to Potential Impacts on historic paving and kerbing, historic street furniture and lamp standards and other features NTA acknowledges the comments raised relating to the historic kerbing at Mount Temple School, kerbing/cobbles at the entrance to Clontarf Golf Club, surviving lampposts on Haverty Road, Carleton Road and St Aidan’s Park Road, cast iron bollard at Clontarf Golf Club and post box not recorded by the NIAH north of the junction with Collins Avenue and note that Volume 2 - Main Chapters, Chapter 16 Architectural Heritage Section 16.5.1 and Volume 4 Appendices Part 2 of 2, Appendices A16.1-A16.3 Architectural Heritage, Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric sets out the approach to mitigating impacts during the construction phases. The methodology has been prepared in accordance with the Architectural Heritage Protection: Guidelines for Planning Authorities (DEHLG 2011) and Paving: the conservation of historic ground surfaces (McLoughlin 2017).

Impacts on Architectural Heritage arising from Proposed Tree Removal

In regard to Impacts on Architectural Heritage arising from Proposed Tree Removal, Volume 3 – Figures, Chapter 4 Proposed Scheme Description, 5. Landscaping General Arrangement, the existing trees at this location are to be retained and protected. The impact of the proposed works at RPS 4852 & 4853 (62 and 64 Malahide Road) is set out in Volume 2 - Main Chapters, Chapter 16 Architectural Heritage, Section 16.4.3.1 which notes that the current boundary is not the original and the railings, gates and capping stones have been previously replaced with good quality replicas and vehicular entrances have been added. As set out in Chapter 17 Landscape (Townscape) & Visual, Section 17.4.4.1.11, the new boundary treatment will be reinstated at setback location. Overall, there would be a relatively small loss of private / garden area which will result in a partial loss of landscape amenity space, but there would be no notable change to the key characteristics of these properties.

Impacted trees have been presented on the Volume 3 – Figures, Chapter 4 Proposed Scheme Description, 5. Landscaping General Arrangements and further described in Volume 4 Appendices Part 2 of 2, Appendix A17.1 Arboricultural Impact Assessment. The Proposed Scheme has been specifically

designed to retain the existing mature trees on the western boundary of Clontarf Golf Club at this location as set out in Volume 2 - Main Chapters, Chapter 3 Consideration of Reasonable Alternatives under Section 3.4.3 and extract below:

“Readjustment of the inbound alignment from the entrance of Clontarf Golf Club to Mount Temple entrance into the median resulting in reduced impact on the boundary of the Golf Club and the environmental benefit of reducing impact on mature boundary trees and vegetation. This change results in impacts on less mature trees within the median, but avoids impacts on the golf club boundary and associated mature trees and vegetation...”

Historic Paving, Setts, Kerbing & Associated Features

In regard to Historic Paving, Setts, Kerbing & Associated Features NTA recognises the importance of protecting historic street surfaces and note that these mitigation measures have been considered in the EIAR, Volume 2 - Main Chapters, Chapter 16 Architectural Heritage Section 16.5.1 as set out below:

“Proposed mitigation measures for architectural heritage features are outlined below and detailed in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR. The methodology has been prepared in accordance with the Architectural Heritage Protection: Guidelines for Planning Authorities (DEHLG 2011) and Paving: the conservation of historic ground surfaces (McLoughlin 2017)”

Boundary Treatments

In regard to Boundary Treatments NTA recognises the importance of maintaining the character of the streetscape where boundary adjustments are required. In the Supplementary Information section of the planning application documentation, Section 13.5 of the Preliminary Design Report outlines the approach to maintaining boundary treatment character. This is also reflected in the EIAR Volume 2 - Main Chapters, Chapter 5 Construction Sections 5.3.1, 5.3.2 and 5.5.2.1 and is specifically assessed in Sections 17.4.1.3, 17.4.3.2.8 and 17.4.4.1.11 of Chapter 17 Landscape (Townscape) & Visual which notes that:

“Overall, there would be a relatively small loss of private / garden area which will result in a partial loss of landscape amenity space, but there would be no notable change to the key characteristics of these properties.”

The Proposed Scheme photomontages have been provided in Volume 3 – Figures, Chapter 17 Landscape and Visual Figure 17.2. The assessment of the photomontages has also been set out in Chapter 17 Landscape (Townscape) & Visual Section 17.5.2.1. The photomontages have been prepared from key or illustrative viewpoints to give an indication of changes and potential effects resulting from the Proposed Scheme during the Operational Phase after the implementation of the scheme.

The assessments of View 01, View 03 and View 04 under the Proposed Scheme is set out in Chapter 17 Landscape (Townscape) & Visual Section 17.5.2.1 and further set out below:

“17.5.2.1.1.2 View 01: As Proposed

Figure 17.2.1.2 shows the proposed view from the same viewpoint during the Operational Phase. The primary changes to the viewpoint are the widening of the road on both sides, the introduction of segregated cycle tracks, the loss and reinstatement of garden boundaries, and notable loss of trees and garden vegetation. There is also the introduction of a new bus lane to the left of the road.

Cycle tracks have been introduced with red tarmac surfacing and footpaths are reinstated with poured concrete finish as existing. The new view is more open, with less features of visual interest, and more visually dominated by the road corridor, due mainly to loss of the trees on the west side of the road. There will be a notable change to the character and visual amenity of the view, although this would be mitigated over time by the growth of replacement planting to some gardens

17.5.2.1.3.2 View 03: As Proposed

Figure 17.2.3.2 shows the proposed view from the same viewpoint during the Operational Phase. The primary change to the view is the widening of the road on the right (southeast) side. Property boundary walls have been removed and reinstated in a similar style. On the right side of the road a segregated cycle track has been added separated from the road by a continuous kerb and surfaced in red tarmac. Some shrubs and hedges have been removed and reinstated within front

gardens along the right side of the road, both in the foreground and middle ground. The left side of the road has a minor reduction to the footpath width with addition of a segregated cycle track in red tarmac. There is no visible loss of trees within the view. There would be no perceivable change to the character or visual amenity of the view.

17.5.2.1.4.2 View 04: As Proposed

Figure 17.2.4.2 shows the proposed view from the same viewpoint during the Operational Phase. The primary changes are the widening of the road on the southeast side resulting in a loss of approximately a two-metre strip of front gardens to residential properties, including loss and reinstatement of minor garden vegetation. The utility and lighting poles have been relocated to accommodate the widening. The road has been altered with segregated cycle tracks to both sides. The changes do not impact on views of the church. There would be no perceivable change to the character or visual amenity of the view."

Historic Street Furniture

In regard to Historic Street Furniture, the NTA recognises the importance of preservation of historic street furniture and notes that the suggested measures have been addressed in the EIAR in Volume 2 - Main Chapters, Chapter 16 Architectural Heritage Section 16.5.1 as set out below:

"Proposed mitigation measures for architectural heritage features are outlined below and detailed in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR. The methodology has been prepared in accordance with the Architectural Heritage Protection: Guidelines for Planning Authorities (DEHLG 2011) and Paving: the conservation of historic ground surfaces (McLoughlin 2017)"

Gardens & Trees

In regard to the Gardens & Trees issues raised by the DCC Conservation Department, the NTA recognises the importance of the contribution of open spaces, gardens and landscape features in relation to the character and setting of Protected Structures and their settings, ACA's and areas zoned Z2 and Z8 in the Dublin City Council Development Plan 2016-2022.

These items have been considered and assessed in the EIAR in Volume 2 - Main Chapters, Chapter 16 Architectural Heritage Section 16.4.4 where it is noted that:

"The proposed improvements to the public realm, and the resulting reduction in vehicular traffic will generally have a positive effect on the historic environment and the character of the streetscapes along the Proposed Scheme."

Car Parking in Protected Structures and ACAs

In regard to Car Parking in Protected Structures and ACAs, the NTA recognises the importance of assessing the potential impact of the proposed bus corridor on existing on-street car parking and associated assessment and mitigation measures have been set out in the EIAR, Volume 2 - Main Chapters, Chapter 6 Traffic and Transport, Volume 4 Appendices Part 1 of 2, 01. A6.1 Transport Impact Assessment Report and summarised in Volume 2 - Main Chapters, Chapter 4 Proposed Scheme Description, and Chapter 10 Population.

Section 4.6.11 of Chapter 4 summarises the changes to the parking and loading provisions along the Malahide Road as a result of the Proposed Scheme. This will result in impacts on commercial and residential parking in this area which are reported in the above referenced section as follows:

- *In the Northern Cross area, existing access locations to car parks of businesses will be modified by the new scheme;*
- *In the Coolock area, the Proposed Scheme designates residential parking which is expected to reduce the amount of informal parking that obstructs pedestrians and cyclists;*
- *In the Artane area customer parking will be reduced from 7 adjacent parking spaces, 1 disabled parking space and 10 informal parking spaces across the road to 5 parking spaces and 1 disabled parking space in a designated parking area adjacent to the commercial units;*
- *In the Donnycarney area, 11 informal residential and commercial parking spaces will be replaced with 6 designated parking spaces; and*

- *14 designated paid parking spaces will be removed along the Malahide Road at the junction to Marino Mart which serves business along the road*

As set out in the Traffic Impact Assessment Report under Section 6.2.2.1.5.4 and 6.2.2.1.7, the Proposed Scheme formalises the parking arrangements to improve the environment, particularly for pedestrians and cyclists. Given the availability of equivalent types of parking along adjacent streets within 200m of these locations (and typically within under 100m), the overall impact of this loss of parking is considered to have a Negative, Moderate and Long-term effect between Gracefield Road to Marino Mart / Fairview – Malahide Road and a Negligible and Long-term effect between Mayne River Avenue to Gracefield Road along the Proposed Scheme. This moderate effect is considered acceptable in the context of the aim of the Proposed Scheme, to provide enhanced walking, cycling and bus infrastructure on this key access corridor. The Proposed scheme will also increase the number of disabled parking spaces as set out in Chapter 6 Traffic & Transport Section 6.4.6.1.7.4. Similarly, Volume 4 Appendices Part 2 of 2, Appendix A10.2 The Economic Impact of the Core Bus Corridors, identifies improved commercial opportunities once the new infrastructure is in place with increased walking and cycling and the evidence shows that any loss of business through less customers arriving by cars is more than compensated for by increased numbers of customers arriving by more sustainable modes of transport.

No consequential modifications or alterations of front gardens have been identified as part of the Proposed Scheme works to accommodate losses of on-street parking. Any future proposals or requests to convert gardens for parking purposes would require planning permission from DCC as per Appendix 5 of the forthcoming Draft City Development Plan 2022-2028.

Proposed Bus Stops and Protected Structures/ ACAs

In regard to Proposed Bus Stops and Protected Structures/ ACAs, the NTA recognises the importance of the contribution of bus stops in relation to the character and setting of Protected Structures and ACA's. The EIAR Volume 2 - Main Chapters, Chapter 16 Architectural Heritage

Section 16.4.4.1.1 notes regarding the Santry River Conservation Area that:

"The Proposed Scheme includes minor alterations which it is anticipated will impact on the CA during the Operational Phase. The proposed alterations do not impact any identified sensitive fabric. (Included in) The alterations are:

The removal of the bus-stop and shelter, on the southeast side of the bridge (the impact of which will be positive);"

Section 16.4.4.2 for NIAH structures notes that:

"A new bus-shelter will be positioned in front of the Marino Health Centre (NIAH 50120063). The building is of Medium sensitivity. It is well set back from the carriageway behind a well-established area of grass and trees which will not be impacted by the Proposed Scheme. The magnitude of impact is Negligible. The potential impact of the Operational Phase on the NIAH Structure is Negative, Imperceptible and Long-Term

At the Electricity Sub-station on Clontarf Road (NIAH 50120122), where two trees, one mature, and one semi-mature, will be removed from in front of the building; the ground surfaces will be renewed and soft landscaping will replace the existing tarmac surface around the sides and back of the building. The existing 9m Scotch Standard lamp-post (CBC0001LP001) to the south of the substation will be retained, and the existing bus-shelters to the north will be replaced. The substation is of Medium sensitivity. The removal of the trees will improve the views of the building, enhancing its presence in the streetscape. Replacing the ground surfaces and adding soft landscaping will have a Positive impact, the magnitude of which is Medium. The potential impact of the Operational Phase on the NIAH Structure is Positive, Moderate and Long-Term."

New Traffic Semaphore & Signage

In regard to New Traffic Semaphore & Signage, the NTA recognises the importance of the rationalisation of signage across the Proposed Scheme to reduce visual clutter and of particular importance in relation to the siting of associated utilities and traffic management signage in the vicinity of Protected Structures and Conservation Areas, historic paving and historic street furniture. As set out in Volume 2 - Main Chapters, Chapter 17 Landscape (Townscape) & Visual Section 17.4.1.3:

"Proposals for the treatment of the public realm within the streetscape impacted by the Proposed Scheme will have regard to the existing character of the street or location, to emerging policies,

objectives and proposals for the public realm and to opportunities for mitigation of impact on the public realm and the streetscape. Proposals will have regard to historic details and features, to the quality of existing and proposed materials, to the reduction of clutter, ease of legibility, and management and maintenance requirements; “

New Cycle Lanes

In regard to New Cycle Lanes, the NTA recognises the importance of cycle track materials in areas that are in close proximity to Protected Structures and within ACA's generally.

The key considerations for providing the red asphalt cycle track material are set out in Volume 4 Appendices Part 1 of 2, Appendix A4.1 PDGB, Section 5.5 of the Preliminary Design Guidance Booklet. There are a number of functional and safety requirements that are linked to the provision of an asphalt surface to provide a high ride quality through safe, smooth and continuous surfaces. Similarly, the red colouring is another important safety feature for establishing a contrast between other surfaces to promote a more legible segregation of modes. Other technical requirements including adequate skid resistance need to be considered in the selection of a suitable running surface for high quality cycle infrastructure. The typical construction details for cycle infrastructure are set out in Section 5.6 of the National Cycle Manual.

In regard to the recommended measures relating to Conservation Issues in the Appendix of the DCC Submission the NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Conservation Department comments and recommendations as these matters were the subject of extensive liaison throughout the design development process. NTA will however continue the very positive and constructive liaison with DCC throughout the procurement and construction process. These issues are addressed within the planning application documents as follows:

- The proposed approach to safeguarding architectural interest of affected Architectural Heritage across the Proposed Scheme is covered in Section 16.5 in Chapter 16 in Volume 2 of the EIAR.
- The proposed engagement of an architectural heritage specialist is addressed in Section 16.5 in Chapter 16 in Volume 2 of the EIAR.
- Best conservation practice, specifications, and method statements for the careful and sensitive relocation and reinstatement of historic fabric is addressed in Section 16.5 in Chapter 16 in Volume 2 of the EIAR.
- The proposed engagement of an architectural heritage specialist and the duties is addressed in Section 16.5 in Chapter 16 in Volume 2 of the EIAR.
- The NTA will engage with the relevant local authority departments in accordance with the relevant guidelines, policy and legislation outlined in 16.2.4 Chapter 16 in Volume 2 of the EIAR.
- Best conservation practice and the Architectural Heritage Protection Guidelines for Planning Authorities (2011) and the Advice Series issued by the Department of Housing, Local Government and Heritage are referenced in 16.2.4 Chapter 16 in Volume 2 of the EIAR.
- The proposed protection measures for all existing original architectural heritage features in the vicinity of the works are outlined in Section 16.5 Chapter 16 in Volume 2 of the EIAR.
- The requirement of the appointed contractor relating to the Architectural Heritage is outlined Section 16.5 Chapter 16 in Volume 2 of the EIAR.

2.4.11. City Architects Department Comments

Response to Section 2.4.11 (including reference to the Appendix):

On page 25 of the DCC submission, the City Architects Department welcomes 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. It goes on to state that the 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. This Department also notes that proposals for public realm upgrades, including widened footpaths, high quality hard and soft landscaping contribute towards a safer, more attractive environment for pedestrians are included, and that the Scheme has been developed having regard to relevant accessibility guidance and universal design principles so as to provide access for all users.

The NTA notes the general comments on the Proposed Scheme in this section and the recommendations in the Appendix. NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC City Architects Department comments as these matters were the subject of extensive liaison throughout the design development process. NTA will however continue the very positive and constructive liaison with DCC throughout the procurement and construction process.

2.5.12. Parks, Biodiversity and Landscape Division

Response to Section 2.5.12 (including reference to the Appendix):

(Note that the DCC document numbering changed from Section 2.4.11 to 2.5.12)

As regards the reference to Mayfield Park, the Proposed Scheme will require an area of permanent acquisition along the full extent of the boundary with Malahide Road. The existing boundary, entrance and footpath and new planting will be re-erected / re-established at a setback alignment along the new footpath edge. There will be no loss of the active recreation facilities (football pitches) as a result to the Proposed Scheme. EIAR Chapter 17 Landscape (Townscape) and Visual Section 17.4.4.1.8 provides an assessment of the impact on the park and concludes that the change is moderate in extent with the partial loss of a key element (land area) but the character of the open space will be relatively unchanged. The magnitude of change is medium.

The NTA notes the general comments on the Proposed Scheme in this section and the recommendations in the Appendix.

An arboricultural survey has been undertaken for the Proposed Scheme to identify the condition of potentially impacted trees. This survey is included in Appendix 17.1 of Volume 4 of the EIAR.

The Landscape Proposals for the Scheme including the maturity of the new trees utilized are outlined in Appendix B5 of the Preliminary Design Report. These landscape proposals include the number of new trees, hedge planting and planting species. The maintenance period is addressed in the Construction Environmental Management Plan in Appendix 5.1 Volume 4 of the EIAR and Chapter 5 of Volume 2 of EIAR.

NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Parks, Biodiversity and Landscape Division comments as these matters were the subject of extensive liaison throughout the design development process. NTA will however continue the very positive and constructive liaison with DCC throughout the procurement and construction process.

2.6. Conclusion

C5 - Response to Section 2.6

DCC is supportive of the Proposed Scheme and state in their conclusion on page 27 of the submission:

“The Clongriffin to City Centre Core Bus Corridor Scheme is supported and welcomed by Dublin City Council as it will ensure the delivery of a number of key policies and objectives of the Dublin City Development Plan 2016-2022 as well as the draft Dublin City Development Plan 2022-2028.”

DCC further confirms (at page 27 of its submission) that the development of the Proposed Scheme will provide an upgraded and expanded bus network and quality of service together with better quality cycling and pedestrian facilities and DCC acknowledges that these improvements will make it easier for people to access and use public transport. It also acknowledges that the Proposed Scheme will, in turn, 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.

C6 - Summary Response to Appendix:

Dublin City Council and the National Transport Authority

DCC have set out at the start of their appendix a number of suggested conditions.

Proposed Condition 1:

The first recommended condition requested by DCC states:

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.*

Under the provisions of the relevant legislation, the NTA has exercised certain powers under Section 44(2)(b) of the 2008 Act to the effect that the functions in relation to securing the provision of public transport infrastructure falling within Section 44(2)(a) of the 2008 Act (as amended) in relation to the CBC Infrastructure Works, should be performed by the NTA. Those functions include the design and construction of the Proposed Scheme and, effectively, the NTA becomes the road authority in respect of the exercise of those functions.

Under the relevant legislation, upon the completion of the construction of the Proposed Scheme the NTA automatically ceases to be the road authority and the status of DCC as the relevant road authority is automatically restored – it does not require the operation of the conventional “taking-in-charge” arrangements provided for elsewhere in legislation. Accordingly, the legislative provisions appropriately govern the arrangements for the NTA to commence the construction of the Proposed Scheme, subject to the necessary planning and environmental consents, and govern the restoration of the road authority function to the relevant local authority, in this case being Dublin City Council.

Notwithstanding the above, the NTA intends to continue the close liaison with DCC that has been in place during the planning and design stage of the Proposed Scheme, during and throughout the subsequent construction stage. This will include engaging and collaborating on the construction arrangements, the road maintenance arrangements during construction and the standard to which the Proposed Scheme will be completed prior to transfer back to DCC, together with record retention, all in full accordance with the EIAR. Given the legislative framework that is in place, the NTA is satisfied that these are matters can, and will, be successfully addressed between DCC and the NTA, in the absence of any approval condition.

Proposed Condition 2:

The second recommended condition requested by DCC states:

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.*

This proposed condition seeks the enactment of an agreement between DCC and the NTA, subsequent to the completion of the construction of the Proposed Scheme, addressing issues related to maintenance costs.

The Proposed Scheme upon its completion reverts to the status of a public road under the management of the relevant local authority, in this case Dublin City Council. The funding of costs associated with the maintenance of public roads can involve a number of parties depending on the status of the road – for

instance, in the case of a national road Transport Infrastructure Ireland would have an involvement. As the Proposed Scheme does not encompass any section of national road, its components constitute regional and/or local roads only. Funding of regional and local roads fall under the ambit of the relevant local authority and the Department of Transport.

The Exchequer does not currently provide the NTA with funds for dispersal to local authorities for maintenance activities and the NTA does not have a role in overseeing or organising general public road maintenance activities. However, the NTA does retain responsibility for bus fleet, bus stops and bus shelters, and maintenance of these elements falls within its remit.

The NTA agrees with the objective stated in the draft condition, namely to ensure “*maintenance of the corridor as a high quality public transport corridor with agreed levels of performance*”. To achieve that objective, the NTA anticipates continuing its collaboration with DCC to ensure the delivery of an appropriate maintenance regime. As part of this collaboration, the NTA will support the provision of the necessary funding by the relevant parties to ensure that the benefits of the Proposed Scheme are not inappropriately eroded. The NTA is satisfied that these are matters that can be successfully addressed between DCC and the NTA, in the absence of any approval condition.

Proposed Condition 3:

The third recommended condition requested by DCC states:

3. *All relevant DCC departments involved with the development of the Scheme shall be consulted during the detailed design development process for the Scheme and the NTA shall seek, to the extent practicable, to incorporate the requirements of the DCC departments into the final detailed design of the Scheme.*

The NTA acknowledges the close liaison with DCC that has been in place during the planning and design stage of the Proposed Scheme, which included extensive dialogue with the relevant sections within the Council. The NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has properly considered, and taken into account, the inputs from those sections during the design development process.

It is the intention of the NTA that this collaboration will continue both in advance of, and during, the subsequent construction stage of the Proposed Scheme. This will include continued liaison with the relevant sections of the Council and taking their requirements into consideration, where aligned with and consistent with the EIAR. The NTA is satisfied that these are matters that can be successfully addressed between DCC and the NTA, in the absence of any approval condition.

Traffic Division

The NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Traffic Division comments provided in the Appendix regarding consideration of the traffic management equipment that is necessary for the safe and efficient operation of this Public Transport corridor, and including all traffic signal equipment, and the relevant DCC specification. NTA is aware of, and acknowledges, the important role of the relevant DCC maintenance contractor, and their continued role on both the existing and new traffic signals. These matters were the subject of extensive liaison throughout the design development process.

Roads Division

The NTA notes the additional comments from the Roads Division (Department) provided in the Appendix. The NTA is satisfied that these matters were the subject of extensive liaison throughout the design development process and that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board:

- The principles of universal design.

- The DCC Roads Department inputs regarding Pay and Display parking and associated infrastructure for set down/loading for potentially impacted commercial units.
- The DCC Roads Department inputs regarding off-street parking within the curtilage of a dwelling.

In relation to an awareness, education and behavioural change programme, the earlier section titled “Awareness, Education and Behavioural Change Programme”, identified that the need for a communications programme related to sustainable transport promotion is outside the scope of a singular project and would, instead, be likely to have a national or regional focus. It also identified the provisions within the Draft Greater Dublin Area Transport Strategy 2022-2042, referenced in Section 2.3.4.3 of Chapter 2 (Need for Proposed Scheme) of Volume 2 of the EIAR, which sets out behavioural change measures that are intended to be implemented across the GDA, including sustainable transport initiatives, residential travel planning and the expansion of Smarter Travel Workplaces and Campuses Programme plus the Green Schools Programme. These commitments reflect measures already contained in the current Transport Strategy for the Greater Dublin Area 2016 – 2035 and in other national policies. The NTA anticipates undertaking these measures, in co-operation with DCC, and other local authorities, which will deliver the awareness, education and behavioural change programme suggested by DCC.

Public Lighting Department

The NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Public Lighting Department inputs regarding the required light level design and the relevant EN certification as these matters were the subject of extensive liaison throughout the design development process.

Environmental Protection Division

In regard to the Recommendations/Conditions of the Environmental Protection Division set out in the Appendix NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Environmental Protection Division inputs regarding criteria and processes as these matters were the subject of extensive liaison throughout the design development process.

Air and Noise Pollution Control Unit

The NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Air and Noise Pollution Control Unit inputs regarding the Construction Environmental Management Plan (located in Volume 4 Appendix 5.1) submitted with the application and the Unit’s Good Practice Guide for Construction and Demolition as these matters were the subject of extensive liaison throughout the design development process.

Archaeology Department

The NTA notes the recommendation set out in the Appendix by the Archaeology Department and has set out in the EIAR the intention to appoint a Project Archaeologist.

Conservation Department

In regard to the recommended measures relating to Conservation Issues in the Appendix the NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Conservation Department comments and recommendations as

these matters were the subject of extensive liaison throughout the design development process. These issues are addressed within the planning application documents as follows:

- The proposed approach to safeguarding architectural interest of affected Architectural Heritage across the Proposed Scheme is covered in Section 16.5 in Chapter 16 in Volume 2 of the EIAR.
- The proposed engagement of an architectural heritage specialist is addressed in Section 16.5 in Chapter 16 in Volume 2 of the EIAR.
- Best conservation practice, specifications, and method statements for the careful and sensitive relocation and reinstatement of historic fabric is addressed in Section 16.5 in Chapter 16 in Volume 2 of the EIAR.
- The proposed engagement of an architectural heritage specialist and the duties is addressed in Section 16.5 in Chapter 16 in Volume 2 of the EIAR.
- The NTA will continue to engage with the relevant local authority departments in accordance with the relevant guidelines, policy and legislation outlined in 16.2.4 Chapter 16 in Volume 2 of the EIAR.
- Best conservation practice and the Architectural Heritage Protection Guidelines for Planning Authorities (2011) and the Advice Series issued by the Department of Housing, Local Government and Heritage are referenced in 16.2.4 Chapter 16 in Volume 2 of the EIAR.
- The proposed protection measures for all existing original architectural heritage features in the vicinity of the works are outlined in Section 16.5 Chapter 16 in Volume 2 of the EIAR.
- The requirement of the appointed contractor relating to the Architectural Heritage is outlined Section 16.5 Chapter 16 in Volume 2 of the EIAR.

City Architects Department

Response

The NTA notes the general comments on the Proposed Scheme in the recommendations in the Appendix. NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC City Architects Department comments as these matters were the subject of extensive liaison throughout the design development process.

Parks, Biodiversity and Landscape Division

Response

The NTA notes the general comments on the Proposed Scheme in the recommendations in the Appendix. NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Parks, Biodiversity and Landscape Division comments as these matters were the subject of extensive liaison throughout the design development process.

2.6 Individual Properties – Submissions in Response to Proposed Scheme and CPO

2.6.1 Overview of Submissions

For each of the 13 submissions made by residents in relation to the Proposed Scheme at individual properties, a submission was also made in response to the CPO relating to the proposed acquisition of land from the front of the premises.

Table 2.6.1 below lists these 13 submissions, along with their location and with the relevant CPO submission number noted.

Table 2.6.1: Submissions Made in Respect of Individual Properties

Submission No	Name	Address	CPO Submission No
1	Sherry Abraham & Bijo George	Upmeads, Mornington Park	CPO-24
5	Gavin and Clara Guinane	Winston Ville 62 Malahide Road	CPO-30
6	Gerard & Davina Murnaghan	Winston Ville 64 Malahide Road	CPO-07
7	Noel Regazzoli	Sunview, Mornington Park	CPO-11
35	Bernadette & Maria Clarke	St Gerard's, Mornington Park	CPO-04
46	Fintan & Eileen Murphy	10 Maypark	CPO-06
61	Aidan & Christina McGovern, c/o Sudway & Co Ltd	Mornington Park	CPO-21
64	Blarney Stone Public House, c/o Sudway & Co Ltd	Mornington Park	CPO-20
65	Caroline O'Hara	210 Malahide Road	CPO-19
68	David and Lisa Clarke	4 Maypark	CPO-23
75	Jacqueline & Anthony Grant	6 Maypark	CPO-18
76	Kieran Tumulty & Danielle O'Riordan	28 Malahide Road	CPO-16
84	Stephen Flanagan and others	Helensville, Mornington Park	CPO-22

The submissions raised a number of issues, several of which were common to many of the 13 submissions. There was also some commonality of the issues raised at each geographical location. Therefore, the submissions have been grouped geographically where appropriate and the following sections provide the details of the submissions by the following locations:

- Maypark (submissions 46, 68 and 75);
- Mornington Park (submissions 1,7, 35, 61, 64 and 84);
- Winston Ville (submissions 5 and 6); and
- Other locations (submissions 65 and 76).

2.6.2 Maypark

46 - Fintan & Eileen Murphy (CPO-06)

Issues Raised

- i. Proximity of property to Malahide Road / Security

The submission asserts that the property will be closer to the main road and footpath leading to an increase in litter and rubbish in their property. As a result, they express the view that 2m high gates and fencing/wall will be required to the new boundary.

- ii. Access during operation

The submission raises concerns about access and egress in and out of their driveway if new manual closing gates are fitted which they say would require stopping in the cycle track/ bus lane. They suggest the installation of electric gates and mirrors and also state that they believe residents should be allowed to use the bus lanes for access to their properties, with enforcement cameras for the bus lanes for other traffic.

Response

- i. Proximity of property to Malahide Road /Security

At this location the Proposed Scheme will require approximately 2.0m of land acquisition from the property to accommodate the proposed cycle track, with the boundary walls being replaced on a like for like basis. The potential for littering and dumping of rubbish will not change as result of the new boundary.

- ii. Access during operation

Presently accessing / egressing the properties requires crossing the bus lane and the footpath; with the Proposed Scheme it will also involve crossing the new cycle track. The existing width of the footpath is approximately 2.3m wide. The width of the proposed footpath is 2.0m and the cycle track is 1.75m in front of the properties, with the increase in width crossed 1.45m.

The principle of how residents can access/ egress their properties is unchanged by the scheme proposals. The objections note that under current legislation residents are not permitted to reverse out of their driveways on to the Malahide Road; however, it is not illegal to reverse from a driveway onto a road; in accordance with Statutory Instrument S.I. No. 182/1997 - Road Traffic (Traffic and Parking) Regulations, 1997 Section 12 (3) *"A driver shall not reverse from a place adjacent to a public road onto a public road save where it is clear to the driver that to so reverse would not endanger other traffic or pedestrians."*

Also, in relation to S.I. No. 182/1997 Section 13 Driving on Footway, a vehicle is allowed to be driven across the footpath for the purpose of access to or egress from a place adjacent to the footpath, and in accordance with S.I. No. 182/1997 Section 14 Cycle Tracks that a vehicle is also allowed to be driven across the cycletrack for the purpose of access to or egress from a place adjacent to a cycle track.)

68 - David and Lisa Clarke (CPO-23)

Issues raised

- i. Access during operation

The submission raised concerns about access in and out of their driveways, particularly the need to reverse into the driveway across a new cycle track.

- ii. Noise and access during construction

The submission raised concerns about construction noise and the ability to access to their properties during construction

iii. Loss of Parking

The submission raised issues with the loss of space for parking within the property being reduced/removed due to the proposed cycle track /footpath

iv. Noise Impacts

The submission raised concerns about noise pollution as a result of road traffic being closer to the property.

v. Landscape Impacts

The submission was concerned with the loss of landscape features within their property.

Response

i. Access during operation

Presently accessing / egressing the properties requires crossing the bus lane and the footpath; with the Proposed Scheme it will also involve crossing the new cycle track. The existing width of the footpath is approximately 2.3m wide. The width of the proposed footpath is 2.0m and the cycle track is 1.75m in front of the properties, with the increase in width crossed 1.45m.

The principle of how residents can access/ egress their properties is unchanged by the scheme proposals. The objections note that under current legislation residents are not permitted to reverse out of their driveways on to the Malahide Road; however, it is not illegal to reverse from a driveway onto a road; in accordance with Statutory Instrument S.I. No. 182/1997 - Road Traffic (Traffic and Parking) Regulations, 1997 Section 12 (3) "*A driver shall not reverse from a place adjacent to a public road onto a public road save where it is clear to the driver that to so reverse would not endanger other traffic or pedestrians.*"

Also, in relation to S.I. No. 182/1997 Section 13 Driving on Footway, a vehicle is allowed to be driven across the footpath for the purpose of access to or egress from a place adjacent to the footpath, and in accordance with S.I. No. 182/1997 Section 14 Cycle Tracks that a vehicle is also allowed to be driven across the cycletrack for the purpose of access to or egress from a place adjacent to a cycle track.)

ii. Noise and access during construction

Section 9.4.3 of EIAR Chapter 9 Noise and Vibration assesses the impact of the construction phase of the Proposed Scheme on noise levels. As summarised in Table 9.24 general road works including junction realignments are within 10m to 30m of the nearest NSLs. The predicted cumulative noise levels for these works at the closest NSL façades are between 69 to 79 dB LAeq,T in the absence of any noise mitigation. Making reference to the CNLs in Table 9.24 the potential noise impacts at the closest NSLs range between negative, slight to significant, and temporary during the daytime period and negative, moderate to very significant, and temporary during the evening and weekend periods in the absence of noise mitigation. Reference to Table 9.22 indicates that highest noise levels will occur when road planers are operating at the closest distance to NSLs. During specific periods when these activities are operating outside NSL's, higher noise levels will occur compared to those discussed in Table 9.24. These activities will occur, however, for intermittent periods of time at any one location over the course of a working day.

Table 9.41 of Chapter 9 summarises the predicted construction phase impacts following the implementation of mitigation and monitoring measures assessment. For general road works and boundary wall construction works the predicted impact is negative, not significant and temporary at noise sensitive locations at distances greater than 10m from the proposed works.

When roads and streets are being upgraded, there will be some temporary disruption / alterations to on-street and off-street parking provision, and access to premises in certain locations along the Proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. As described in paragraph 5.5.3.1 of Chapter 5 Construction of Volume 2 of the EIAR, details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the

area. The duration of the works will vary from property to property, but access and egress will be maintained at all times.

iii. Loss of parking

In order to accommodate the required segregated cycle track the Proposed scheme will require between 1.9m and 2.1m of land acquisition from the property and the demolition and replacement of the existing boundary. The new proposed boundary treatment to the front driveways will be approximately at least 9m wide and will be between 11.6m and 12.7m from the building upon completion of the scheme. This will not significantly affect the availability for parking at the property at these locations.

iv. Noise Impacts

The land acquisition at this location is required to accommodate the required cycle track, with minimal change to the alignment of the existing bus lane at this location. As a result of the Proposed Scheme the edge of the bus lane will be between 0.57m to 0.67m closer to the properties.

Section 9.4.4 of EIAR Chapter 9 Noise and Vibration assesses the impact of the operational phase of the Proposed Scheme on noise levels. As set out in Section 9.4.4.1.1.4 along the Proposed Scheme, a direct, positive, imperceptible to slight, short to medium term impact is calculated (Reference to Table 9.15). This is as a result of reduction in overall traffic volumes through the incorporation of bus priority signals and junctions, restricted turning movements for private vehicles and the incorporation of dedicated bus lanes, cycle lanes and footpaths. The overall direct impact is determined to be positive, imperceptible to slight and short to medium term. The minimal change to the location of the bus lane and general traffic lane at this location (0.57 to 0.67m) will have an imperceptible impact on noise levels at the properties at this location.

v. Landscape Impacts

In order to accommodate the required segregated cycle track the Proposed Scheme will require between 1.9m to 2.0m of land acquisition from the properties which will involve the removal of existing planting along the inside of the existing boundary wall.

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage your its agent / valuer in preparing, negotiating and advising on compensation.

75 - Jacqueline & Anthony Grant (CPO-18)

Issues raised

i. Access during operation

The submission raised concerns about access in and out of their driveways, particularly the need to reverse into the driveway across a new cycle track.

ii. Noise and access during construction

The submission raised concerns about construction noise and the ability to access to their properties during construction

iii. Loss of Parking

The submission raised issues with the loss of space for parking within the property being reduced/removed due to the proposed cycle track /footpath

iv. Noise Impacts

The submission raised concerns about noise pollution as a result of road traffic being closer to the property.

v. Landscape Impacts

The submission was concerned with the loss of landscape features within their property.

Response

i. Access during operation

Presently accessing / egressing the properties requires crossing the bus lane and the footpath; with the Proposed Scheme it will also involve crossing the new cycle track. The existing width of the footpath is approximately 2.3m wide. The width of the proposed footpath is 2.0m and the cycle track is 1.75m in front of the properties, with the increase in width crossed 1.45m.

The principle of how residents can access/ egress their properties is unchanged by the scheme proposals. The objections note that under current legislation residents are not permitted to reverse out of their driveways on to the Malahide Road; however, it is not illegal to reverse from a driveway onto a road; in accordance with Statutory Instrument S.I. No. 182/1997 - Road Traffic (Traffic and Parking) Regulations, 1997 Section 12 (3) *“A driver shall not reverse from a place adjacent to a public road onto a public road save where it is clear to the driver that to so reverse would not endanger other traffic or pedestrians.”*

Also, in relation to S.I. No. 182/1997 Section 13 Driving on Footway, a vehicle is allowed to be driven across the footpath for the purpose of access to or egress from a place adjacent to the footpath, and in accordance with S.I. No. 182/1997 Section 14 Cycle Tracks that a vehicle is also allowed to be driven across the cycletrack for the purpose of access to or egress from a place adjacent to a cycle track.)

ii. Noise and access during construction

Section 9.4.3 of EIAR Chapter 9 Noise and Vibration assesses the impact of the construction phase of the Proposed Scheme on noise levels. As summarised in Table 9.24 general road works including junction realignments are within 10m to 30m of the nearest NSLs. The predicted cumulative noise levels for these works at the closest NSL façades are between 69 to 79 dB LAeq,T in the absence of any noise mitigation. Making reference to the CNLs in Table 9.24 the potential noise impacts at the closest NSLs range between negative, slight to significant, and temporary during the daytime period and negative, moderate to very significant, and temporary during the evening and weekend periods in the absence of noise mitigation. Reference to Table 9.22 indicates that highest noise levels will occur when road planers are operating at the closest distance to NSLs. During specific periods when these activities are operating outside NSL's, higher noise levels will occur compared to those discussed in Table 9.24. These activities will occur, however, for intermittent periods of time at any one location over the course of a working day.

Table 9.41 of Chapter 9 summarises the predicted construction phase impacts following the implementation of mitigation and monitoring measures assessment. For general road works and boundary wall construction works the predicted impact is negative, not significant and temporary at noise sensitive locations at distances greater than 10m from the proposed works.

When roads and streets are being upgraded, there will be some temporary disruption / alterations to on-street and off-street parking provision, and access to premises in certain locations along the Proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. As described in paragraph 5.5.3.1 of Chapter 5 Construction of Volume 2 of the EIAR, details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area. The duration of the works will vary from property to property, but access and egress will be maintained at all times.

iii. Loss of parking

In order to accommodate the required segregated cycle track the Proposed scheme will require between 1.9m and 2.1m of land acquisition from the property and the demolition and replacement of the existing boundary. The new proposed boundary treatment to the front driveways will be approximately at least 9m wide and will be between 11.6m and 12.7m from the building upon completion of the scheme. This will not significantly affect the availability for parking at the property at these locations.

iv. Noise Impacts

The land acquisition at this location is required to accommodate the required cycle track, with minimal change to the alignment of the existing bus lane at this location. As a result of the Proposed Scheme the edge of the bus lane will be between 0.57m to 0.67m closer to the properties.

Section 9.4.4 of EIAR Chapter 9 Noise and Vibration assesses the impact of the operational phase of the Proposed Scheme on noise levels. As set out in Section 9.4.4.1.1.4 along the Proposed Scheme, a direct, positive, imperceptible to slight, short to medium term impact is calculated (Reference to Table 9.15). This is as a result of reduction in overall traffic volumes through the incorporation of bus priority signals and junctions, restricted turning movements for private vehicles and the incorporation of dedicated bus lanes, cycle lanes and footpaths. The overall direct impact is determined to be positive, imperceptible to slight and short to medium term. The minimal change to the location of the bus lane and general traffic lane at this location (0.57 to 0.67m) will have an imperceptible impact on noise levels at the properties at this location.

v. Landscape Impacts

In order to accommodate the required segregated cycle track the Proposed Scheme will require between 1.9m to 2.0m of land acquisition from the properties which will involve the removal of existing planting along the inside of the existing boundary wall.

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage your its agent / valuer in preparing, negotiating and advising on compensation.

2.6.3 Mornington Park

01 - Sherry Abraham & Bijo George (CPO-24)

Issues raised

This submission raised five potential issues

- i. Unsatisfactory consultation and engagement, particularly during covid – Ayrfield response
- ii. Alternative options not considered – earlier response
- iii. Loss of parking
- iv. Access/egress
- v. Air and Noise Pollution
- vi. Loss of privacy/planting /compensation

Response

- i. Unsatisfactory consultation and engagement, particularly during covid

The submission raises a number of concerns in respect of the consultation undertaken for the Proposed Scheme, particular in light of government restrictions during the Covid pandemic.

The Public Consultation Report 2018-2022 provided in the Supplementary Information for the Proposed Scheme outlines the extensive public consultation and stakeholder engagement undertaken during that period, with three rounds of non-statutory public consultation undertaken.

Throughout the three rounds a number of consultation tools were used, including:

- a dedicated website, launched in May 2017;
- an individual brochure for the Proposed Scheme (updated at all 3 rounds);
- public information events (in person for first and second rounds, virtual for third round),
- Community Forum events, to create a two-way communication process with representatives of local communities, (in person for first and second rounds, virtual for third round, average attendees 24);
- range of digital channels, including Twitter and Facebook;
- traditional published material;
- press and radio advertising;
- outdoor advertising;
- presentations; and
- infographics.

The public events took place in accessible venues chosen to maximise the level of local engagement and attendance where possible. These events allowed members of the public to speak directly and in detail with members of the BusConnects Infrastructure team about the proposals. These non-statutory Public Information Events were advertised in local newspapers, through radio, on the BusConnects website, through extensive email reminders to public representatives, Local Authorities' Public Partnership Networks (PPN's), emails to Community Forum members, promoted through social media and digital channels.

The following paragraphs provide more details of each of the three rounds on non-statutory consultation for the Proposed Scheme.

First non-statutory round of public consultation

The first non-statutory round of public consultation for the Clongriffin to City Centre Core Bus Corridor Emerging Preferred Route Option (EPRO) took part from 14th November 2018 on the 29th March 2019. The first Community Forum meeting for the Clongriffin to City Centre Core Bus Corridor took

place on 11th December 2018 at the Hilton Hotel, Malahide Road with approximately 20 representatives in attendance. A Public Information Event was held at the Hilton Hotel, Malahide Road on the 10th January 2019.

Second non-statutory round of public consultation

A second Community Forum event was held at the Hilton Hotel, Malahide Road on the 11th September 2019, with approximately 15 in attendance. This Community Forum was held in advance of the launch of second round of non-statutory public consultation. The meeting aimed to keep members updated on the design process between the first and second consultation.

In March 2020, the Draft Preferred Route Option (PRO) was published and a second non-statutory round of public consultation commenced on 4 March 2020 and ran until 17 April 2020. The consultation was announced via press release and a media press release and included a Public Information Event at the Bonnington Hotel in Whitehall on the 11th March 2020.

Due to the COVID-19 pandemic, all events scheduled after 12 March 2020 were cancelled. In deference to the submissions we had already received, the decision was made not to cancel the consultation. Consequently, there were just 30 submissions received relating to the Clongriffin to City Centre Core Bus Corridor.

Third non-statutory round of public consultation

The third round of non-statutory public consultation took place from 4th November 2020 until 16th December 2020 on the updated Draft Preferred Route Option for the Proposed Scheme. The consultation was announced via press release, on the NTA website and on social media. Public representatives were made aware of the publication of the revised proposals via email. This email also contained information on Community Forums for TDs, Senators and Councillors to assist in spreading awareness of the meetings. A briefing session was organized via Zoom to take place on 4 November 2020. Members of the Transport & Communications Networks Oireachtas Committee were separately made aware of the launch.

Due to the Covid19 pandemic, which commenced with restrictions in March 2020 and continued throughout the second and third public consultation rounds, the BusConnects Infrastructure team developed online and virtual elements to assist the public in viewing and reading the proposals. Our primary virtual interactive tool during the final third phase of public consultation was the use of virtual consultation rooms available through the BusConnects website. These rooms were online for a six week period (24hrs x 7 days a week) and included the following:

- all Scheme materials available for perusal, such as the brochure, maps and all associated support documentation;
- an audio description of the brochure information; and
- a call back facility within the virtual rooms for any stakeholder to book a phone call back from a member of the BusConnects Infrastructure team for additional information or more detailed queries.

These Virtual Consultation Rooms replaced the more traditional Public Information Events due to the Covid restrictions on face-to-face interactions, typically used during non-statutory public consultation. Compared to the face-to-face Public Information Events utilised during the first round of Non-Statutory Public Consultation the numbers of the public that engaged increased significantly due to the online access available through this facility. Over the seven weeks of the consultation, 363 unique users visited the virtual information room for Clongriffin to City Centre Core Bus Corridor.

In addition, a third Centre Community Forum meeting took place on 18th November 2020 with approximately 15 representatives in attendance.

Following each of the three rounds of non-statutory public consultation the feedback / submissions were reviewed and the views expressed were considered in the design development process.

ii. Alternative options not considered

The submission expressed the view that the NTA have not considered alternative options adequate.

As set out in Section 3.4.1.1. of EIAR Chapter 3 Alternatives Considered, following on from public consultations, there were requests to minimise the impacts on the properties in Mornington Park on

the Malahide Road. It was suggested that reducing the number of bus lanes from two to one would reduce the amount of land required by 3m.

Two options were considered utilising Signal Controlled Bus Priority as follows:

- Option 1: utilise Signal Controlled Priority on the inbound carriageway between Danieli Road and Kilmore Road.
- Option 2: utilise Signal Controlled Priority in the opposite direction on the outbound carriageway between Kilmore Road and Danieli Road.

In reviewing the options and taking the Proposed Scheme objectives into account, it is apparent that while there is benefit in both options in the reduction of land take and disturbance to residences, they do however have a significant disbenefit in regard to ensuring Bus Priority and maintaining the flow of traffic. With regard to Signal Controlled Priority, it is necessary to consider the traffic implications both upstream and downstream of the area under consideration. For the Signal Controlled Priority to operate successfully, queues or tailbacks on the single (shared bus/traffic) lane portion cannot be allowed to develop, as this will result in delays on the bus service and therefore would undermine the bus priority objective.

For Option 1, the signalised junction at Kilmore Road would only allow 3 or 4 cars to queue before impacting on the shared lane section. The Bus Priority signal located at Danieli Road would control all inbound traffic and signalling at Kilmore Road. This would significantly increase the delay to all inbound traffic including buses and other traffic from Kilmore Road.

For Option 2, the signalised junction at Kilmore Road would need to hold general traffic outbound to give priority to the buses. The Bus Priority signal located at Kilmore Road would control all outbound traffic but would have to synchronise with the Ardlea Junction to ensure no tailbacks developed to such an extent that they prevent operation of the Bus Priority. There would be additional delays at Kilmore Road during the operation of the Bus Priority signals including the buses that utilise Kilmore Road. There is also the potential for increase in delay to all inbound traffic including traffic from Kilmore Road.

The PRO proposal has some advantages in terms of public transport network integration (e.g., better operation of the bus route), and has significant advantages with respect to traffic network integration (e.g., expected traffic impact of each route option) when compared to the alternatives Options 1 and 2. When compared to the PRO Proposal Options 1 and 2 are not considered to enhance the capacity and potential of the public transport system. It will not improve bus speeds, reliability and punctuality through the provision of bus lanes and other measures to provide priority to bus movement over general traffic movements.

Options 1 and 2 have some advantages when compared to the PRO proposal in terms of environmental impact (e.g. reduced land take from residential gardens).

Notwithstanding that Options 1 and 2 have lesser environmental impacts (reduced landtake and associated disturbances to residences) when compared to the PRO proposal it is considered that both these options would not enhance the capacity and potential of the public transport system by improving bus speeds, reliability and punctuality through the provision of bus lanes and other measures to provide priority to bus movement over general traffic movements. Therefore, the PRO proposal has been retained as the preferred option

Further details are provided in in Section 6.1 of the Preferred Route Option (PRO) Report provided as part of the Supplementary Information.

The objection also argues that there is no evidence that the land acquisition at this “pinch point” will have any impact on the journey time of buses and that there is no economic or social justification provided by the NTA for this element of the project.

As set out in Section 3.4.1.1. of EIAR Chapter 3 Alternatives Considered both options have a significant disbenefit in regard to ensuring Bus Priority and maintaining the flow of traffic when compared to the Proposed Scheme arrangement. As explained above, in considering Signal Controlled Bus Priority it is necessary to look at the traffic implications both upstream and downstream of the area under consideration. For the Signal Controlled Priority to operate successfully queues or

tailbacks on the single lane portion of the Signal Controlled Priority cannot be allowed to develop as this will result in delays on the bus service.

Section 6.1 of the PRO Report provides further information on the impacts of bus journey time. Currently on the Malahide Road north of Kilmore Road there are 17 buses operating inbound along this section of the Malahide Road during the morning peak, this is expected to increase to 21 by 2028. There are 7 inbound and 6 outbound buses operating along Kilmore Road during the morning peak, this is expected to increase to 9 inbound and 7 outbound by 2028.

For Option 1 the signalised junction at Kilmore Road would only allow 3 or 4 cars to queue before impacting on the shared lane section. Effectively the traffic signal controls, that would be located at Danieli Road would control all inbound traffic, including buses and signalling at Kilmore Road. This would significantly increase the delay to all inbound traffic including traffic from Kilmore Road.

For Option 2 the signalised junction at Kilmore Road would need to hold general traffic outbound to give priority to the buses. Currently there are 13 buses operating outbound along this section of the Malahide Road during the morning peak, this is expected to increase to 20 by 2028. Effectively the Bus Priority signal located at Kilmore Road would control all outbound traffic but would have to synchronise with the Ardlea Junction to ensure no tailbacks develop to such an extent that they prevent operation of the Bus Priority. There is also the potential for increase in delay to all inbound traffic including traffic from Kilmore Road. Loss of Parking

The submission noted the residents have 5 cars parked on the private drive which will be reduced to 2 as a result of the proposed works which will lead to paid parking costs for them.

The design allows for the safe use of the access as per the design standards. The existing footpath is 1.7m wide and the proposed footpath will be widened to 2.0m which will allow easier use when egressing the access.

The Permanent acquisition will result in the loss of between 4.0m to 4.2 m this will result in the new boundary being at least 7.0m from the front of the house. It is believed that this should not hinder the parking cars at present but there will be the loss of the planted area on the house side of the front boundary wall.

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage your its agent / valuer in preparing, negotiating and advising on compensation.

iii. Access/egress

The submission raised concern about the inability to turn their car around if the land is acquired. The Permanent acquisition will result in the loss of between 4.0m to 4.2 m this will result in the new boundary being at least 7.0m from the front of the house. It is believed that this should not hinder the parking of cars at present but there will be the loss of the planted area on the house side of the front boundary wall.

The design allows for the safe use of the access as per the design standards. The new bus lane will be 2.1m closer to the property but the separation from the boundary wall to the bus lane will increase from 1.6m to 3.5m allowing easier egress from the property.

The principle of how residents can access/ egress their properties is unchanged by the scheme proposals. It is not illegal to reverse from a driveway onto a road; in accordance with Statutory Instrument S.I. No. 182/1997 - Road Traffic (Traffic and Parking) Regulations, 1997 Section 12 (3) "*A driver shall not reverse from a place adjacent to a public road onto a public road save where it is clear to the driver that to so reverse would not endanger other traffic or pedestrians.*"

Also, in relation to S.I. No. 182/1997 Section 13 Driving on Footway, a vehicle is allowed to be driven across the footpath for the purpose of access to or egress from a place adjacent to the footpath, and in accordance with S.I. No. 182/1997 Section 14 Cycle Tracks that a vehicle is also allowed to be driven across the cycletrack for the purpose of access to or egress from a place adjacent to a cycle track.)

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage your its agent / valuer in preparing, negotiating and advising on compensation

iv. Air and Noise Pollution

The submission raises concerns in relation to the air and noise pollution that will be caused as a result of the scheme.

EIAR Chapter 7 Air Quality provides details of the air quality assessment undertaken for the Proposed Scheme. For this section of the corridor this has been assessed as Negligible to Moderate Beneficial as shown in Figures 7.1 and Figures 7.3 to 7.8 of Chapter 7 Air Quality of Volume 3 of the EIAR, in the vicinity of Mornington Park around the monitoring location CBC0001DT006 shown in Figure 7.1.

Section 9.4.4 of EIAR Chapter 9 Noise and Vibration assesses the impact of the operational phase of the Proposed Scheme on noise levels. As set out in Section 9.4.4.1.1.4 along the Proposed Scheme, a direct, positive, imperceptible to slight, short to medium term impact is calculated (Reference to Table 9.15). This is as a result of reduction in overall traffic volumes through the incorporation of bus priority signals and junctions, restricted turning movements for private vehicles and the incorporation of dedicated bus lanes, cycle lanes and footpaths.

In relation to the impact of the Proposed Scheme on noise in the vicinity of Mornington Park, monitoring location CBC0001UNML001, as shown on Sheet 2 of Figure 9.4 of Chapter 9 Noise and Vibration of Volume 3 of the EIAR, this has been assessed as Imperceptible / Positive.

v. Loss of privacy/planting /compensation

The submission states that the acquisition of land will lead to a loss privacy and security, as well the loss of planting on the property side of the boundary wall.

The permanent acquisition will result in the loss of between 4.0m to 4.2m with an additional 2.0m temporarily required to allow for the construction of boundary treatment and tying into the existing garden/driveway.

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage your its agent / valuer in preparing, negotiating and advising on compensation.

07 - Noel Regazzoli (CPO-11)

Issues raised

This submission raised four potential issues

- i. Access to Property
- ii. Impact on air and noise
- iii. Loss of landscaping at Property
- iv. Increase in Traffic

Response

- i. Access to Property

The submission sets out that the family has a wheelchair users that requires bus transport daily that usually would park outside their house to provide easy access for the wheelchair. The objection raises

a concern that the Proposed Scheme would stop this access and severely affect the wheelchair user's daily routine and life.

The Proposed Scheme includes the provision of a new bus lane on this side of the Malahide Road at this location. As per S.I. No. 182/1997 - Road Traffic (Traffic and Parking) Regulations, 1997 section 39 Parking in Bus Lanes is allowed for taxis or a wheelchair accessible taxis which are stopped while picking up or setting down passengers. As such the Proposed Scheme will not significantly impact the current arrangements in this regard.

ii. Impact on air and noise

EIAR Chapter 7 Air Quality provides details of the air quality assessment undertaken for the Proposed Scheme. For this section of the corridor this has been assessed as Negligible to Moderate Beneficial as shown in Figures 7.1 and Figures 7.3 to 7.8 of Chapter 7 Air Quality of Volume 3 of the EIAR, in the vicinity of Mornington Park around the monitoring location CBC0001DT006 shown in Figure 7.1.

Section 9.4.4 of EIAR Chapter 9 Noise and Vibration assesses the impact of the operational phase of the Proposed Scheme on noise levels. As set out in Section 9.4.4.1.1.4 along the Proposed Scheme, a direct, positive, imperceptible to slight, short to medium term impact is calculated (Reference to Table 9.15). This is as a result of reduction in overall traffic volumes through the incorporation of bus priority signals and junctions, restricted turning movements for private vehicles and the incorporation of dedicated bus lanes, cycle lanes and footpaths.

In relation to the impact of the Proposed Scheme on noise in the vicinity of Mornington Park, monitoring location CBC0001UNML001, as shown on Sheet 2 of Figure 9.4 of Chapter 9 Noise and Vibration of Volume 3 of the EIAR, this has been assessed as Imperceptible / Positive.

Section 9.4.4.2 of EIAR Chapter 9 Noise and Vibration considers the operational vibration impact of the Proposed Scheme. Analysis of traffic data for the Proposed Scheme indicates a reduction in overall AADT traffic flows along the core bus corridor. Reference to the monitoring results in Table 9.20 and Table 9.21 of Chapter 9 confirms that vibration levels associated with passing buses and other vehicular traffic at distances of 2.5 to 10m from the road edge are negligible in terms of human perception and building response. Vibration levels associated with a passing bus were recorded at 0.1mm/s PPV or less under the monitored scenarios. These values are below the normal range of perceptible human response to vibration and would not pose any significant impact.

iii. Loss of Landscape on the Property

The submission raises concerns about the loss of 3.5m of their property and the landscape behind the existing property boundary.

The proposed scheme will result in the permanent acquisition of between 2.3m to 3.3m of land, as a result of this acquisition the existing landscaping will be impacted. If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage their agent / valuer in preparing, negotiating and advising on compensation.

iv. Increase in Traffic

The submission comments that HGV traffic diverts along this section of the Malahide Road every Thursday evening when the Dublin Port Tunnel is closed for maintenance and is concerned about the increase in traffic caused by the proposed scheme. Section 6.4.6.2.8.3 of EIAR Chapter 6 Traffic and Transport notes that there is a slight to very significant reduction in general traffic flows along the direct study area during the AM and PM Peak Hours, which is attributed to the Proposed Scheme and the associated modal shift as a result of its implementation. This reduction in general traffic flow has been determined as an overall Positive, Significant and Long-term effect on the direct study in the AM and PM peak hours.

35 - Bernadette & Maria Clarke (CPO-04)

Issues raised

This submission raised four issues.

- i. Environmental issues: Vibration, noise, air pollution and loss of planting/screening

The objections raised concerns about noise pollution, vibration and loss of privacy as a result of road traffic being closer to the property and the removal of mature planting.

- ii. Loss of parking / access during operation and construction impact
- iii. Loss of access to wastewater and sewerage
- iv. Alternative proposal for signal controlled priority for buses

Response

- i. Environmental issues: Vibration, noise, air pollution and loss of planting/screening

The permanent acquisition of land between 4.2m to 4.4m of land is to allow for the construction of a bus lane, 1.5m wide cycle track and 2.0m wide footpath and with the new boundary being approximately 9.0m from the property. The proposed new road alignment will move the existing kerb line of the proposed bus lane between 2.4 to 2.7m closer to the property.

EIAR Chapter 7 Air Quality provides details of the air quality assessment undertaken for the Proposed Scheme. For this section of the corridor this has been assessed as Negligible to Moderate Beneficial as shown in Figures 7.1 and Figures 7.3 to 7.8 of Chapter 7 Air Quality of Volume 3 of the EIAR, in the vicinity of Mornington Park around the monitoring location CBC0001DT006 shown in Figure 7.1.

Section 9.4.4 of EIAR Chapter 9 Noise and Vibration assesses the impact of the operational phase of the Proposed Scheme on noise levels. As set out in Section 9.4.4.1.1.4 along the Proposed Scheme, a direct, positive, imperceptible to slight, short to medium term impact is calculated (Reference to Table 9.15). This is as a result of reduction in overall traffic volumes through the incorporation of bus priority signals and junctions, restricted turning movements for private vehicles and the incorporation of dedicated bus lanes, cycle lanes and footpaths.

In relation to the impact of the Proposed Scheme on noise in the vicinity of Mornington Park, monitoring location CBC0001UNML001, as shown on Sheet 2 of Figure 9.4 of Chapter 9 Noise and Vibration of Volume 3 of the EIAR, this has been assessed as Imperceptible / Positive.

Section 9.4.4.2 of EIAR Chapter 9 Noise and Vibration considers the operational vibration impact of the Proposed Scheme. Analysis of traffic data for the Proposed Scheme indicates a reduction in overall AADT traffic flows along the core bus corridor. Reference to the monitoring results in Table 9.20 and Table 9.21 of Chapter 9 confirms that vibration levels associated with passing buses and other vehicular traffic at distances of 2.5 to 10m from the road edge are negligible in terms of human perception and building response. Vibration levels associated with a passing bus were recorded at 0.1mm/s PPV or less under the monitored scenarios. These values are below the normal range of perceptible human response to vibration and would not pose any significant impact.

In terms of the loss of the mature planting and the details of the proposed new boundary, it is intended that boundaries will be replaced on a like for like basis. If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage its agent / valuer in preparing, negotiating and advising on compensation.

- ii. Loss of parking / access during operation and construction impact

Presently accessing / egressing the properties requires crossing the advisory cycle lane and the footpath; with the Proposed Scheme it will also involve crossing the new bus lane, cycle track and footpath, which is permitted under legislation. The new boundary will be approximately 9.0m from the property.

The principle of how residents can access/ egress their properties is unchanged by the scheme proposals. It is not illegal to reverse from a driveway onto a road; in accordance with Statutory Instrument S.I. No. 182/1997 - Road Traffic (Traffic and Parking) Regulations, 1997 Section 12 (3) “A driver shall not reverse from a place adjacent to a public road onto a public road save where it is clear to the driver that to so reverse would not endanger other traffic or pedestrians.”

Also, in relation to S.I. No. 182/1997 Section 13 Driving on Footway, a vehicle is allowed to be driven across the footpath for the purpose of access to or egress from a place adjacent to the footpath, and in accordance with S.I. No. 182/1997 Section 14 Cycle Tracks that a vehicle is also allowed to be driven across the cycletrack for the purpose of access to or egress from a place adjacent to a cycle track.)

Regarding construction impact, when roads and streets are being upgraded, there will be some temporary disruption / alterations to on-street and off-street parking provision, and access to premises in certain locations along the Proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. As described in paragraph 5.5.3.1 of Chapter 5 of Volume 2 of the EIAR, details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area. The duration of the works will vary from property to property, but access and egress will be maintained at all times.

It is noted that the impact of the proposed scheme on Traffic and Transport has been assessed and is outlined in Chapter 6 Traffic and Transport of the EIAR. Mornington Park is located within Section 2 (2a) of the assessment shown in Figure 6.6 of Chapter 6. It is noted construction of the Proposed Scheme has the potential to impact people’s day-to-day activities along the corridor while the works are underway. Chapter 5 Construction and the CEMP Appendix A5.1 in Volume 4 of the EIAR identifies impactful activities, their effects and mitigation measures.

Significant impacts due to general traffic redistribution away from the direct study area are not anticipated during the Construction Phase. There may be a requirement for some localised temporary lane closures for short durations of the day however access for general traffic to existing residential and commercial units immediately adjacent to the Proposed Scheme is to be accommodated throughout the Construction Phase.

Based on the traffic and transport assessment undertaken as part of the EIAR, it is noted the general traffic impacts are described as Negative, Slight and Short-term effect for the Construction Phase. Table 6.11 in section 6.4.5.5 of Chapter 6 of Volume 2, Traffic and Transport, outlines the overall construction phase impacts for the proposed scheme for walking, cycling, bus, Parking & Loading, and general traffic.

Section 9.4.3 of EIAR Chapter 9 Noise and Vibration assesses the impact of the construction phase of the Proposed Scheme on noise levels. As summarised in Table 9.24 general road works including junction realignments are within 10m to 30m of the nearest NSLs. The predicted cumulative noise levels for these works at the closest NSL façades are between 69 to 79 dB LAeq,T in the absence of any noise mitigation. Making reference to the CNLs in Table 9.24 the potential noise impacts at the closest NSLs range between negative, slight to significant, and temporary during the daytime period and negative, moderate to very significant, and temporary during the evening and weekend periods in the absence of noise mitigation. Reference to Table 9.22 indicates that highest noise levels will occur when road planers are operating at the closest distance to NSLs. During specific periods when these activities are operating outside NSL’s, higher noise levels will occur compared to those discussed in Table 9.24. These activities will occur, however, for intermittent periods of time at any one location over the course of a working day.

iii. Loss of access to wastewater and sewerage

The submission raised a concern about access to a drainage manhole in the garden of the property should it be located within the land to be acquired. The Proposed Scheme will not impact on the existing public wastewater and sewerage systems serving the property. The existing public foul sewer is located within the existing Malahide Road corridor as shown on the Foul Water Asset drawings in EIAR Chapter 4 proposed Scheme Description Volume 3 Figures.

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs

(as part of the claim) for the landowner to engage your its agent / valuer in preparing, negotiating and advising on compensation.

iv. Alternative proposal for signal controlled priority for buses

The submission refers to a previous alternative proposal the submitted to the NTA suggesting Signal Controlled Priority for buses at this location to avoid the need to widen the road to provide continuous bus lane in the outbound direction.

As set out in Section 3.4.1.1. of EIAR Chapter 3 Alternatives Considered, following on from public consultations, there were requests to minimise the impacts on the properties in Mornington Park on the Malahide Road. It was suggested that reducing the number of bus lanes from two to one would reduce the amount of land required by 3m.

Two options were considered utilising Signal Controlled Bus Priority as follows:

- Option 1: utilise Signal Controlled Priority on the inbound carriageway between Danieli Road and Kilmore Road.
- Option 2: utilise Signal Controlled Priority in the opposite direction on the outbound carriageway between Kilmore Road and Danieli Road.

In reviewing the options and taking the Proposed Scheme objectives into account, it is apparent that while there is benefit in both options in the reduction of land take and disturbance to residences, they do however have a significant disbenefit in regard to ensuring Bus Priority and maintaining the flow of traffic. With regard to Signal Controlled Priority, it is necessary to consider the traffic implications both upstream and downstream of the area under consideration. For the Signal Controlled Priority to operate successfully, queues or tailbacks on the single (shared bus/traffic) lane portion cannot be allowed to develop, as this will result in delays on the bus service and therefore would undermine the bus priority objective.

For Option 1, the signalised junction at Kilmore Road would only allow 3 or 4 cars to queue before impacting on the shared lane section. The Bus Priority signal located at Danieli Road would control all inbound traffic and signalling at Kilmore Road. This would significantly increase the delay to all inbound traffic including buses and other traffic from Kilmore Road.

For Option 2, the signalised junction at Kilmore Road would need to hold general traffic outbound to give priority to the buses. The Bus Priority signal located at Kilmore Road would control all outbound traffic but would have to synchronise with the Ardlea Junction to ensure no tailbacks developed to such an extent that they prevent operation of the Bus Priority. There would be additional delays at Kilmore Road during the operation of the Bus Priority signals including the buses that utilise Kilmore Road. There is also the potential for increase in delay to all inbound traffic including traffic from Kilmore Road.

The PRO proposal has some advantages in terms of public transport network integration (e.g., better operation of the bus route), and has significant advantages with respect to traffic network integration (e.g., expected traffic impact of each route option) when compared to the alternatives Options 1 and 2. When compared to the PRO Proposal Options 1 and 2 are not considered to enhance the capacity and potential of the public transport system. It will not improve bus speeds, reliability and punctuality through the provision of bus lanes and other measures to provide priority to bus movement over general traffic movements.

Options 1 and 2 have some advantages when compared to the PRO proposal in terms of environmental impact (e.g. reduced land take from residential gardens).

Notwithstanding that Options 1 and 2 have lesser environmental impacts (reduced landtake and associated disturbances to residences) when compared to the PRO proposal it is considered that both these options would not enhance the capacity and potential of the public transport system by improving bus speeds, reliability and punctuality through the provision of bus lanes and other measures to provide priority to bus movement over general traffic movements. Therefore, the PRO proposal has been retained as the preferred option

Further details are provided in in Section 6.1 of the Preferred Route Option (PRO) Report provided as part of the Supplementary Information.

The objection also argues that there is no evidence that the land acquisition at this “pinch point” will have any impact on the journey time of buses and that there is no economic or social justification provided by the NTA for this element of the project.

As set out in Section 3.4.1.1. of EIAR Chapter 3 Alternatives Considered both options have a significant disbenefit in regard to ensuring Bus Priority and maintaining the flow of traffic when compared to the Proposed Scheme arrangement. As explained above, in considering Signal Controlled Bus Priority it is necessary to look at the traffic implications both upstream and downstream of the area under consideration. For the Signal Controlled Priority to operate successfully queues or tailbacks on the single lane portion of the Signal Controlled Priority cannot be allowed to develop as this will result in delays on the bus service.

Section 6.1 of the PRO Report provides further information on the impacts of bus journey time. Currently on the Malahide Road north of Kilmore Road there are 17 buses operating inbound along this section of the Malahide Road during the morning peak, this is expected to increase to 21 by 2028. There are 7 inbound and 6 outbound buses operating along Kilmore Road during the morning peak, this is expected to increase to 9 inbound and 7 outbound by 2028.

For Option 1 the signalised junction at Kilmore Road would only allow 3 or 4 cars to queue before impacting on the shared lane section. Effectively the traffic signal controls, that would be located at Danieli Road would control all inbound traffic, including buses and signalling at Kilmore Road. This would significantly increase the delay to all inbound traffic including traffic from Kilmore Road.

For Option 2 the signalised junction at Kilmore Road would need to hold general traffic outbound to give priority to the buses. Currently there are 13 buses operating outbound along this section of the Malahide Road during the morning peak, this is expected to increase to 20 by 2028. Effectively the Bus Priority signal located at Kilmore Road would control all outbound traffic but would have to synchronise with the Ardlea Junction to ensure no tailbacks develop to such an extent that they prevent operation of the Bus Priority. There is also the potential for increase in delay to all inbound traffic including traffic from Kilmore Road.

Finally, the submission expresses the view that vehicles regularly use the bus lanes that undermines the ability of buses to avail of potential journey time savings.

The NTA acknowledge the comments raised in relation to camera enforcement. Whilst enforcement for the lawful use of bus lanes is currently a matter for An Garda Síochána the NTA is separately exploring proposals and methods for bus lane enforcement as set out under *Measure INT20 – Enforcement of Road Traffic Laws* of the Draft Greater Dublin Area Transport Strategy 2022-2042. Notwithstanding this, specific measures have been considered in the development of the Proposed Scheme that will help deter inappropriate and unlawful use of bus lanes including advanced bus signal detection systems which will activate green signals at traffic lights for authorised vehicles only.

61 - Aidan & Christina McGovern (CPO-21)

Issues raised

This submission raised three potential issues.

- i. Proximity of Bus Lane to property leading to loss of privacy and air / noise pollution
- ii. Loss of parking
- iii. Traffic Hazards – access/egress

Response

- i. Proximity of Bus Lane to property leading to loss of privacy and air / noise pollution

The Permanent acquisition will result in the loss of between 4.1m to 4.5m with an additional 2.0m temporally required to allow for the construction of boundary treatment and tying into the existing garden/driveway. The edge of the proposed bus lane will be 2.2 to 2.7m closer to the building than the kerb of the existing general traffic lane.

The 14.0m front boundary wall will be at least 7.5m from the front of the house. It is believed that this should not hinder the parking cars at present but there will be the loss of the planted area on the house side of the front boundary wall.

In respect of loss of privacy, if the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage your its agent / valuer in preparing, negotiating and advising on compensation.

EIAR Chapter 7 Air Quality provides details of the air quality assessment undertaken for the Proposed Scheme. For this section of the corridor this has been assessed as Negligible to Moderate Beneficial as shown in Figures 7.1 and Figures 7.3 to 7.8 of Chapter 7 Air Quality of Volume 3 of the EIAR, in the vicinity of Mornington Park around the monitoring location CBC0001DT006 shown in Figure 7.1.

Section 9.4.4 of EIAR Chapter 9 Noise and Vibration assesses the impact of the operational phase of the Proposed Scheme on noise levels. As set out in Section 9.4.4.1.1.4 along the Proposed Scheme, a direct, positive, imperceptible to slight, short to medium term impact is calculated (Reference to Table 9.15). This is as a result of reduction in overall traffic volumes through the incorporation of bus priority signals and junctions, restricted turning movements for private vehicles and the incorporation of dedicated bus lanes, cycle lanes and footpaths.

In relation to the impact of the Proposed Scheme on noise in the vicinity of Mornington Park, monitoring location CBC0001UNML001, as shown on Sheet 2 of Figure 9.4 of Chapter 9 Noise and Vibration of Volume 3 of the EIAR, this has been assessed as Imperceptible / Positive.

Section 9.4.4.2 of EIAR Chapter 9 Noise and Vibration considers the operational vibration impact of the Proposed Scheme. Analysis of traffic data for the Proposed Scheme indicates a reduction in overall AADT traffic flows along the core bus corridor. Reference to the monitoring results in Table 9.20 and Table 9.21 of Chapter 9 confirms that vibration levels associated with passing buses and other vehicular traffic at distances of 2.5 to 10m from the road edge are negligible in terms of human perception and building response. Vibration levels associated with a passing bus were recorded at 0.1mm/s PPV or less under the monitored scenarios. These values are below the normal range of perceptible human response to vibration and would not pose any significant impact.

ii. Loss of Parking

The permanent acquisition will result in the loss of between 4.1m to 4.5m. this will result in the new boundary being at least 7.5m from the front of the house. It is believed that this should not hinder the parking cars at present but there will be the loss of the planted area on the house side of the front boundary wall.

iii. Traffic Hazards from access/egress

The submission raised concerns about traffic hazards being created from the location of the bus stop as sight lines for vehicles entering and leaving their property. The objector is concerned about leaving their property and turning right as they will have to stop on the footpath/cycle path to see the road.

The design of the proposed scheme at this location complies with the visibility requirements set out in section 4.4.5 of DMURS. The Safety Audits undertaken for the Proposed Scheme, included as Appendix M of the Preliminary Design Report provided in the Supplementary Information did not highlight any safety issues with the proposed arrangement in this regard.

Presently accessing / egressing the properties requires crossing the advisory cycle lane and the footpath; with the Proposed Scheme it will also involve crossing the new bus lane, cycle track and footpath, which is permitted under legislation. The new boundary will be approximately 9.0m from the property.

The principle of how residents can access/ egress their properties is unchanged by the scheme proposals. It is not illegal to reverse from a driveway onto a road; in accordance with Statutory Instrument S.I. No. 182/1997 - Road Traffic (Traffic and Parking) Regulations, 1997 Section 12 (3) "A driver shall not reverse from a place adjacent to a public road onto a public road save where it is clear to the driver that to so reverse would not endanger other traffic or pedestrians."

Also, in relation to S.I. No. 182/1997 Section 13 Driving on Footway, a vehicle is allowed to be driven across the footpath for the purpose of access to or egress from a place adjacent to the footpath, and in accordance with S.I. No. 182/1997 Section 14 Cycle Tracks that a vehicle is also allowed to be driven across the cycletrack for the purpose of access to or egress from a place adjacent to a cycle track.)

64 - Blarney Stone Public House (CPO-20)

Issues raised

This submission raised six potential issues.

i. Condition on planning permission in 1989

The objection is concerned about a previous planning permission granted in 1989 that required to keep separate the front area of their property from pedestrians. The objector is concerned that the public footpath will extend to the front face of their property.

ii. Health and Safety

The objection is concerned about health and safety due to the doors to the bar and lounge opening outwards onto the footpath, leading to a risk of injury to pedestrians and the risk of customers being struck by cyclists straying off the cycle track.

iii. Loitering at bus stop

The objection is concerned about the location of the bus stop inviting loitering in the area and in front of their property

iv. Loss of outdoor seating area

The objection is concerned about the outdoor seating being removed to accommodate works causing a loss of business

v. Carpark Access

The objection is concerned with the accommodation works during construction disrupting access to the car park.

vi. Traffic Hazards

The objection is concerned about traffic hazards being created from the location of the bus stop citing that sight lines for vehicles entering and leaving the carpark will be affected.

Response

The following is the response to the seven issues raised.

i. Condition on planning permission in 1989

The proposed public footpath will extend to be adjacent to the premises. The proposed width of the footpath in front of the building varies between 2.9m to 4.1m which is greater than the 2.0m desirable minimum width for footpaths as set out in Section 4.6.1 Mainline Cross-section of the EIAR Volume 2 Chapter 4 Proposed Scheme Description. The Proposed Scheme will effectively render the condition as set out as part of the premises 1989 planning permission no longer applicable.

ii. Health and Safety

The proposed distance from building line to the proposed cycle track varies between 4.1m to 2.9m. If the doors to the premises are opened the minimum clear footpath width will be greater than 2.1m. Section 4.6.1 Mainline Cross-section of the EIAR Volume 2 Main Chapter 4 Proposed Scheme Description described that 2.0m is a desirable minimum width for footpaths with 1.2m being an absolute minimum width at pinch points. As per the normal operating procedures, of careful opening of the doors outwards, it is not anticipated that there will be any additional risk incurred by the opening of the doors as a result of the Proposed Scheme.

As described in Section 5.4 of Appendix A4.1 Preliminary Design Guidance Booklet of EIAR Chapter 4 Proposed Scheme Description, one of the core objectives of the CBC project is to provide segregated cycling facilities along the routes. Physical segregation ensures that cyclists are protected from motorised traffic as well as providing segregation from pedestrians. This latter segregation is achieved by the inclusion of a 60mm high minimum vertical kerb is required on the footpath side of the cycle track to ensure that the kerb is properly detectable by visually impaired pedestrians using the footpath. This removes the risk of errant cyclists straying on to the footpath.

iii. Loitering

The Proposed Scheme includes the provision of an Island Bus Stops outside the property. As set out in Section 11.1 of Appendix A4.1 Preliminary Design Guidance Booklet of EIAR Chapter 4 Proposed Scheme Description this is the preferred bus stop option where space constraints allow. This option will reduce conflict between cyclists and stopping buses by deflecting cyclists behind the bus stop. To address the pedestrian and cyclist conflict pedestrian priority crossings accompanied by on-call signals will be provided, with narrowing of the cycle track from 2.0m to 1.5m to prevent cyclists overtaking through the bus stop. Bus passengers are provided with a standard bus shelter will have ample space to wait for the bus on the Island between the bus stop and the cycle track, with no incentive to wait elsewhere.

iv. Loss of Business

It is noted that outdoor seating has been provided at this location in since 2021. If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage your its agent / valuer in preparing, negotiating and advising on compensation.

The impact of the loss of this seating will be reviewed as part of the landowners claim for compensation.

v. Car park access

When roads and streets are being upgraded, there will be some temporary disruption / alterations to on-street and off-street parking provision, and access to premises in certain locations along the Proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. As described in paragraph 5.5.3.1 of Chapter 5 of Volume 2 of the EIAR, details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area. The duration of the works will vary from property to property, but access and egress will be maintained at all times.

vi. Traffic Hazards

Chapter 4 of EIAR Proposed Scheme Description provides details of how the scheme design was developed. Section 4.4 Design Principles sets out how the Preliminary Design Guidance Booklet for BusConnects Core Bus Corridors (PDGB) (NTA 2021), included as Appendix A4.1 in Volume 4 of the EIAR, was prepared to ensure that a consistent design approach for the Core Bus Corridor Infrastructure Works was adopted based on the objectives of the Proposed Scheme. The purpose of the PDGB is to complement various existing guidance documents/design standards relating to the design of urban streets, bus facilities, cycle facilities and public realm. As listed in Section 4.4 DMURS as one of the key documents for the design of urban streets, bus facilities, cycle facilities and public realm.

The design of the proposed scheme at this location complies with the visibility requirements set out in section 4.4.5 of DMURS. The Safety Audits undertaken for the Proposed Scheme, included as Appendix M of the Preliminary Design Report provided in the Supplementary Information did not highlight any safety issues with the proposed arrangement in this regard.

Issues raised

This submission raised five potential issues

- i. Access / egress
- ii. Health and Safety
- iii. Proximity of building to Proposed Scheme / Safety - The edge of the proposed bus lane will be 1.5 to 2.0m closer to the building than the kerb of the existing general traffic lane.
- iv. Air Quality
- v. Noise Pollution
- vi. Value of Property

Response

- i. Access / egress

The submission raised concern about the inability to turn their car around if the land is acquired. The Permanent acquisition will result in the loss of between 3.4m to 3.9m this will result in the new boundary being at least 8.5m from the front of the house. It is believed that this should not hinder the parking cars at present but there will be the loss of the planted area on the house side of the front boundary wall.

The design allows for the safe use of the access as per the design standards. The new bus lane will be 2.1m closer to the property but the separation from the boundary wall to the bus lane will increase from 1.6m to 3.5m allowing easier egress from the property.

The principle of how residents can access/ egress their properties is unchanged by the scheme proposals. It is not illegal to reverse from a driveway onto a road; in accordance with Statutory Instrument S.I. No. 182/1997 - Road Traffic (Traffic and Parking) Regulations, 1997 Section 12 (3) "*A driver shall not reverse from a place adjacent to a public road onto a public road save where it is clear to the driver that to so reverse would not endanger other traffic or pedestrians.*"

Also, in relation to S.I. No. 182/1997 Section 13 Driving on Footway, a vehicle is allowed to be driven across the footpath for the purpose of access to or egress from a place adjacent to the footpath, and in accordance with S.I. No. 182/1997 Section 14 Cycle Tracks that a vehicle is also allowed to be driven across the cycletrack for the purpose of access to or egress from a place adjacent to a cycle track.)

- ii. Health and Safety

The submission raised a concern about increased risk of road traffic accident due to the road being closer to the property. and their own health and safety due to the new route being so close to their property.

As mentioned in the response above, the proposed footpath will require loss of between 3.4m to 3.9m of permanent land take from the property. It is intended to replace existing boundaries on a like for like basis. The proposed boundary treatment will be at least 8.5m from the property upon completion of the scheme. The new bus lane will be 1.5 to 2.0m closer to the property but the separation from the boundary wall to the bus lane will increase from 1.6m to 3.5m.

- iii. Air Quality

EIAR Chapter 7 Air Quality provides details of the air quality assessment undertaken for the Proposed Scheme. For this section of the corridor this has been assessed as Negligible to Moderate Beneficial as shown in Figures 7.1 and Figures 7.3 to 7.8 of Chapter 7 Air Quality of Volume 3 of the EIAR, in the vicinity of Mornington Park around the monitoring location CBC0001DT006 shown in Figure 7.1.

- iv. Noise Pollution

Section 9.4.4 of EIAR Chapter 9 Noise and Vibration assesses the impact of the operational phase of the Proposed Scheme on noise levels. As set out in Section 9.4.4.1.1.4 along the Proposed Scheme,

a direct, positive, imperceptible to slight, short to medium term impact is calculated (Reference to Table 9.15). This is as a result of reduction in overall traffic volumes through the incorporation of bus priority signals and junctions, restricted turning movements for private vehicles and the incorporation of dedicated bus lanes, cycle lanes and footpaths.

In relation to the impact of the Proposed Scheme on noise in the vicinity of Mornington Park, monitoring location CBC0001UNML001, as shown on Sheet 2 of Figure 9.4 of Chapter 9 Noise and Vibration of Volume 3 of the EIAR, this has been assessed as Imperceptible / Positive.

Section 9.4.4.2 of EIAR Chapter 9 Noise and Vibration considers the operational vibration impact of the Proposed Scheme. Analysis of traffic data for the Proposed Scheme indicates a reduction in overall AADT traffic flows along the core bus corridor. Reference to the monitoring results in Table 9.20 and Table 9.21 of Chapter 9 confirms that vibration levels associated with passing buses and other vehicular traffic at distances of 2.5 to 10m from the road edge are negligible in terms of human perception and building response. Vibration levels associated with a passing bus were recorded at 0.1mm/s PPV or less under the monitored scenarios. These values are below the normal range of perceptible human response to vibration and would not pose any significant impact.

v. Value of Property

The submission has concerns about the loss of property value and cites that that they had tried to sell the property but it has not sold due to the uncertainty due, with nearly every party citing the planned works.

EIAR Chapter 10 Population includes Appendix A10.2 Economic Impact of the Core Bus Corridors. Section 3 on page 14 the appendix discusses the impact of the Proposed Scheme on property prices. The conclusion reached is that in overall terms the public realm improvements planned by the NTA may lead to an increase in value of both residential and retail property prices, especially in the community centres along the corridors, with evidence showing that investing in public realm creates nicer places that are more desirable for people and business to locate in, thereby increasing the value of properties in the area.

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage your its agent / valuer in preparing, negotiating and advising on compensation.

2.6.4 Winston Ville

05 - Gavin and Clara Guinane (CPO-30)

Issues raised

The submission included 24 numbered issues which have been summarised into the 7 key topics below and further discussed in subsequent sections.

- i. Land Acquisition
- ii. Health and Safety
- iii. Traffic Calming Measures
- iv. Noise & Environment
- v. Lack of Detail
- vi. Accommodation Works Comments
- vii. Disturbance matters

The issues raised are grouped and summarised below with original headings from the submission also provided (where different or grouped) for context:

- i. Land Acquisition (Permanent/Temporary Acquisition, Viability and Value, Proximity to House, Route Selection Issues, Road Alignment)

The submission does not accept either the permanent or temporary land acquisition proposed which they believe is in excess of what is required for the scheme. The submission has stated that the design of the road is such as to cause a severe negative impact on the viability and/or value and character of the buildings to such an extent that no amount of money will adequately compensate for the losses and damage to the operations and enjoyment of this property arising from this proposed new road scheme. The submission notes that the house is listed. The submission has stated that the proposed new road runs very close to their house to such an extent that it will be very difficult to reside there as intended when originally purchased. The submission raises a concern that alternative routes for the proposed works have not been adequately assessed to provide the service required while protecting the health and safety of the residents of Winston Ville and the local environment. The submission expresses the view that the scheme lacks imagination in using more bus lanes and traffic lights for buses over cars to avoid widening the road.

- ii. Health and Safety

The submission states that there are insufficient details provided in relation to the assessment of health and safety for their family and access to their property.

- iii. Traffic Calming Measures

The submission states that there are insufficient details provided on the new road way such as plans for speed bumps and other traffic calming measures.

- iv. Noise & Environment

The submission expresses the view that inadequate information is provided regarding the mitigation measures that are being proposed to control noise pollution, particularly bringing so much active traffic closer to their home as well as noise generated during the construction period.

The submission asserts that the road development will have significant environmental impacts causing irreversible damage to both the local environment fauna and flora, soil, water, air, climate, the landscape and human beings.

- v. Lack of Detail (Access -General, Services, Drainage, Lighting, Screening and Planting, Boundary Treatment).

The submission raises concerns about the level of detail in relation to access to their property via their electric gated driveways and pedestrian gates during and after the proposed works. The submission states that the level of detail provided is inadequate under a number of headings; services, drainage, lighting, screening and planting, setback distances and boundary treatment.

vi. Accommodation Works Comments (Access Road Details, Setback Distances)

The submission raises concern about the proposal as their driveways would require new gated access to the property because of the works. The submission also raises concerns about the access to their property not being addressed in the proposal and no information on providing adequate space for a turning circle for their vehicles. The submission requests clarification on the setback distance for buildings from the roadway.

vii. Disturbance Matters (Temporary Accommodation, Impact to Work, Road Closures, Road Levels)

The submission has set out that no attempt has been made to assist them with relocation to an alternative site or dwelling or to accommodate their family within the design of the Proposed Scheme. The submission also notes that they work remotely from home and note that the scheme will cause severe negative impact on their ability to remain focused during the construction of the proposed works. The submission has stated that they object to road closure and the potential for variation in road levels.

Response to key topics

i. Land Acquisition

The proposed permanent acquisition at 62 Malahide Road ranges from 0.55m to 0.65m in width and the proposed permanent acquisition at 64 Malahide Road ranges from 0.51m to 0.55m width. A proposed 2.0m wide temporary acquisition is proposed for both properties to allow for building new boundary treatment and tie in the proposed scheme to the existing driveway. A new 2m wide footpath will be provided at this location and the road centreline will be adjusted.

In relation to the impacts on these properties, the environmental impact assessment for the Proposed Scheme has assessed the potential impacts at this location and further summarised below.

The present Malahide Road does not have an outbound bus lane at this location. The provision of a bus lane at this location will be key to ensuring a reliable and efficient service can be provided which can support the Proposed Scheme objectives. Chapter 3 of the EIAR, Consideration of Reasonable Alternatives, sets out the route options assessment process to determine the Preferred Route Option for the Proposed Scheme. As outlined in section 3.3.2.2 of Chapter 3 due consideration has been given to minimize impact on properties from Griffith Avenue to Clontarf Road where the road cross section is particularly constrained. It was not considered feasible to provide dedicated bus, cycle and traffic lanes in both directions along this section, as this would have had a greater impact on residential properties in the area including the removal of off-street parking in the front of a number of the properties with no suitable alternatives available. Section 3.4.1.2 of Chapter 3 also outlines that Signal Controlled Priority on the inbound carriageway between Charlemont Road and Crescent Place was considered. In reviewing this proposal, and taking the Proposed Scheme objectives into account, it is considered that while there is benefit in the reduction of land take and disturbance to residences, they do however have a significant disadvantage in regard to ensuring Bus Priority. The junction of Clontarf Road and the Malahide Road is currently operating at capacity and it is considered that there is a high possibility of vehicles queuing back to Crescent Place and thus preventing inbound buses re-joining the Bus Lane. This would impact the reliability and punctuality of the inbound buses. For these reasons a dedicated bus lane is proposed to meet the objective to enhance the capacity and potential of the public transport system to provide priority to bus movement over general traffic movements.

Table 16.7 of Chapter 16 Architectural Heritage outlines the locations of the Protected Structures along the Proposed Scheme which includes the referenced RPS 4852-3 houses at 62 and 64 Malahide Road. The impact of the proposed works at this location is set out in section 16.4.3.1 which notes that the current boundary is not the original and the railings, gates and capping stones have been previously replaced with good quality replicas and vehicular entrances have been added. As set out in Section 17.4.4.1.11 of Chapter 17 Landscape (Townscape) & Visual, the new boundary treatment will be reinstated at setback location. Overall, there would be a relatively small loss of

private / garden area which will result in a partial loss of landscape amenity space, but there would be no notable change to the key characteristics of these properties.

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on each landowner whose land is being acquired. Following service of the Notice to Treat, each landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage their own agent / valuer in preparing, negotiating and advising on compensation.

ii. Health and Safety

As described in paragraph 5.5.3.1 of Chapter 5 of Volume 2 of the EIAR, details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. The duration of the works will vary from property to property, however access and egress will be maintained at all times.

Similarly, as outlined in Section 5.1.6 of Appendix A5.1 Construction Environmental Management Plan (CEMP) of the EIAR, a Communications Plan in accordance with the NTA's requirements will be put in place by the contractor. This Plan will provide a mechanism for members of the public to communicate with the NTA and the appointed contractor, and for the NTA and the appointed contractor to communicate important information on various aspects of the Proposed Scheme to the public. The Plan will include procedures to inform members of the community directly affected by the Construction Phase on schedules for any activity of a particularly disruptive nature which is likely to impinge on their property such as boundary works, road closures and diversions, and any mitigating actions that are being taken to minimise such disruption.

iii. Traffic Calming Measures

Drawings showing layouts relating to road marking, layout and traffic signalling are included Volume 3 Figures, Chapter 4 Proposed Scheme Description of the EIAR. It is noted that there are no speed humps on the Malahide Road in the vicinity of 62/64 Malahide Road however there are a number of raised table crossings on side roads such as Charlemont Road, Brian Road, Marino Avenue all within the vicinity to 62/64 Malahide Road.

There are a number of traffic calming measures that have been implemented in the Proposed Scheme that will reduce speeds including improved junction layouts with reduced corner radii, narrow carriageway lane widths, raised table crossings on side roads, proposed speed limit reduction at the outer dual carriageway portion of the Proposed Scheme from 60kmph to 50kmph and speed humps on side streets (e.g. St Brendan's Avenue). The additional landscaping and enhanced pedestrian/cyclist priority measures along the Proposed Scheme will also lend themselves to the principles of self-regulating streets as set out in DMURS to encourage lower driving speeds.

iv. Noise & Environment

Figures 9.3 to Figures 9.5 of Chapter 9 of Volume 3 of the EIAR indicate the predicted noise impacts in relation to the Proposed Scheme.

- Figure 9.3 Construction Traffic Noise Impact Summary Sheet 3 of 3, assesses the impact as not significant at this location.
- Figure 9.4 Opening Year 2028 Traffic Noise Impact Summary Sheet 3 of 3, assesses the impact as Imperceptible/Positive at this location
- Figure 9.5 Design Year 2043 Traffic Noise Impact Summary Sheet 3 of 3, assesses the impact as Imperceptible/Positive at this location.

With regard to operational noise impacts, Section 9.4.4.1.1.5 of the EIAR Chapter 9 Noise and Vibration notes along the Proposed Scheme, a direct, positive, imperceptible to slight, short to medium term impact is calculated for the 2028 opening year as a result of reduction in overall traffic volumes through the incorporation of bus priority signals and junctions, restricted turning movements for private vehicles and the incorporation of dedicated bus lanes, cycle lanes and footpaths. Similarly, along the Proposed Scheme, a direct, positive, imperceptible to slight, long-term impact is calculated for the design year 2043. The overall significance ratings are lower for the design year compared to the year of opening due to:

- The magnitude of change ratings for the long term period are less significant compared to the year of opening due to the recognised habituation to traffic noise environment over time; and
- Overall traffic volumes forecast along the core bus corridor and surrounding road network are reduced during the design year compared to the opening year due to modal shift to public transport.

It is likely that a further reduction in overall noise level will occur along the Proposed Scheme due to the transition towards a full EV and HEV bus fleet, this reduction will occur irrespective of the Proposed Scheme.

With regard to construction impacts, where reasonably practicable to do so, works will be carried out during normal working hours and in consultation with local residents as described previously under Health and Safety issue.

As set out in Appendix A5.1 Construction Environmental Management Plan (CEMP) of the EIAR, there are a number of specific noise mitigation and monitoring measures that will be implemented including the following:

NV2: The appointed contractor will put in place the most appropriate noise control measures depending on the level of noise reduction required at individual working areas i.e., based on the construction threshold values for noise and vibration set out in Tables 9.7 and 9.10 in Chapter 9 (Noise & Vibration) of this EIAR. Reference to Table 9.37 in Chapter 9 (Noise & Vibration) of this EIAR indicates that intrusive works occurring within 25m to 45m of Noise Sensitive Locations (NSLs) will need specific noise control measures to reduce impacts depending on the time period over which they will occur, i.e., daytime or evening.

NV8: Construction activities will be scheduled in a manner that reflects the location of the site and the nature of neighbouring properties. Construction activities / plant or equipment items will be considered with respect to their potential to exceed construction noise thresholds at NSLs and will be scheduled according to their noise level, proximity to sensitive locations and possible options for noise control. In situations where an activity with potential for exceedance of construction noise thresholds is scheduled (e.g., road widening and utility diversions or activities with similar noise levels identified in Table 9.22 in Chapter 9 (Noise & Vibration) of this EIAR). Other construction activities associated with the Proposed Scheme will be scheduled to avoid significant cumulative noise levels

NV9: The NTA will establish clear forms of communication that will involve the appointed contractor and NSLs in proximity to the works so that residents or building occupants are aware of the likely duration of activities likely to generate noise or vibration that are potentially significant as set out in Table 9.7 and Table 9.10 in Chapter 9 of this EIAR.

NV10: During the Construction Phase the appointed contractor will carry out noise monitoring at representative NSLs to evaluate and inform the requirement and / or implementation of noise management measures. Noise monitoring will be conducted in accordance with International Organization for Standardization (ISO) 1996–1 (ISO 2016) and ISO 1996–2 (ISO 2017). The selection of monitoring locations will be based on the nearest representative NSLs to the working area which will progress along the length of the Proposed Scheme.

With regard to environmental impacts for the Proposed Scheme, the Environmental Impact Assessment Report (EIAR) has assessed these impacts in each of the assessment chapters and summarised in Table 23.1: Summary of Significant Residual Impacts from the Construction and Operational Phases of the Proposed Scheme of the EIAR Volume 2 of 4 Main Report for the operational phase. It is noted that for;

- **Fauna and Flora** – this is assessed in Chapter 12 Biodiversity of the EIAR. As stated in Section 12.6.2 following the implementation of the mitigation measures the Proposed Scheme will not result in any significant residual effects during the Operational Phase.
- **Soil** – this is assessed in Chapter 14 Land Soils Geology & Hydrogeology of the EIAR. As stated in Section 14.6.2 no significant residual impacts on land, soils, geology and hydrogeology as a result of the operation of the Proposed Scheme
- **Water** – this is assessed in Chapter 13 Water of the EIAR. As stated in Section 13.6.2 no significant residual impacts have been identified in the Operational Phase of the Proposed Scheme.

- **Air** – this is assessed in Chapter 7 Air Quality of the EIAR. As stated in Section 7.6.2 no significant residual impacts have been identified during the Operational Phase of the Proposed Scheme.
- **Climate** – this is assessed in Chapter 8 Climate of the EIAR. As stated in Section 8.8.2 the Proposed Scheme will make a significant contribution to reduction in carbon emissions.
- **Landscape** – this is assessed in Chapter 17 Landscape (Townscape) & Visual of the EIAR. As noted in Section 17.6.2 the impact on No.62 and 64 Malahide Road is deemed to be moderate long term and negative.
- **Human Health** – this is assessed in Chapter 10 Population and in Appendix A10.2 of the EIAR. As noted in Section 10.6.2 the Proposed Scheme will deliver positive impacts in terms of accessibility to commercial businesses for pedestrians, cyclists and bus users during the operational phase.

v. Lack of Detail

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage your its agent / valuer in preparing, negotiating and advising on compensation. Reinstatement of property frontage including boundary walls, gates, railings, driveway, footpath and landscaping will be on a like for like basis and detailed accommodation works plans will be prepared in consultation with landowners in line with any formal agreements and in accordance with any embedded mitigations identified in the EIAR or conditions/modifications from An Bord Pleanála in relation to the Proposed Scheme application.

In relation to information relating to services, drainage, lighting, screening and planting, setback distances and boundary treatment drawings have been included in Volume 3 Figures, and summary text is provided in Chapter 4 Proposed Scheme Description of the EIAR.

- **Services** – The following drawing series provide information in relation to trunk services as provided in Volume 3 Figures in the EIAR : Combined Existing Utilities Records, Telecommunications Asset Alterations, Irish Water Asset Alterations, Gas Networks Ireland Asset Alterations, Irish Water Fowl Sewer Asset Alterations, Proposed Surface Water Drainage Works. Chapter 19 Material Assets in Volume 2 of the EIAR also provides narrative in relation to the proposed works for each of these services.
- **Drainage** – The Proposed Surface Water Drainage Works drawing series in Volume 3 Figures in the EIAR provides information in relation trunk drainage. Section 4.6.15 of Chapter 4 Proposed Scheme Description describes the approach taken for drainage. Chapter 13 Water in Volume 2 of the EIAR also provides additional information in relation to the impact of the proposed drainage works. Supplementary information is also provided in Appendix K Drainage Design Basis Document of the Preliminary Design Report.
- **Lighting**– The Street Lighting drawing series in Volume 3 Figures in the EIAR provides information in relation street lighting. Section 4.6.13 of Chapter 4 Proposed Scheme Description describes the approach taken for street lighting.
- **Screening and Planting** – The Landscaping General Arrangement drawing series in Volume 3 Figures in the EIAR provides information in relation screening and planting. Section 4.6.12 of Chapter 4 Proposed Scheme Description describes the approach taken for landscape and urban realm.
- **Boundary Treatment** - The Fencing and Boundary Treatment drawing series in Volume 3 Figures in the EIAR provides information in relation boundary treatment. Section 4.6.18.1 of Chapter 4 Proposed Scheme Description describes the approach for boundary treatment.

vi. Accommodation Works Comments

Regarding access to 62 and 64 Malahide Road, it is noted that there is presently a bus lane located outside these properties, as such the principle of how residents can access/ egress their properties is generally unchanged following implementation of the Proposed Scheme. The proposed permanent acquisition at 62 Malahide Road ranges from 0.55m to 0.65m in width and the proposed permanent

acquisition at 64 Malahide Road ranges from 0.51m to 0.55m width. This is unlikely to have a significant impact on the effective parking area in comparison to the present situation. The approximate setback distances from the footpath side of the proposed new boundary to the existing building features are provided in Figure 2.6.1 below.

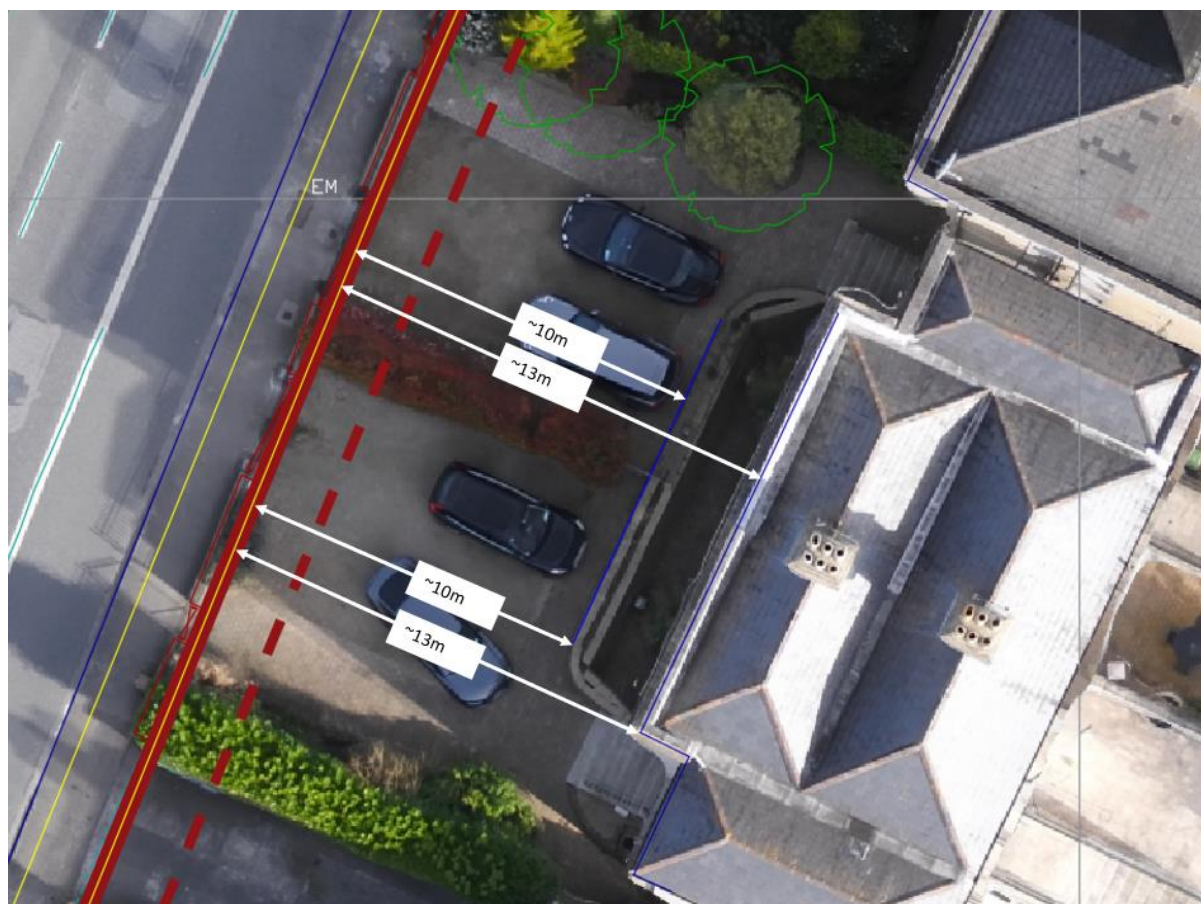


Figure 2.6.1: Proposed set back distances at Winston Ville 64 and 62 Malahide Road

As set out in Section 17.4.4.1.11 of Chapter 17 Landscape (Townscape) & Visual, the new boundary treatment will be reinstated at setback location. Overall, there would be a relatively small loss of private / garden area which will result in a partial loss of landscape amenity space, but there would be no notable change to the key characteristics of these properties.

During the course of the works, it is likely that there will be some temporary disruption / alterations, and access to premises in certain times. As described in paragraph 5.5.3.1 of Chapter 5 of Volume 2 of the EIAR, details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area. The duration of the works will vary from property to property, but access and egress will be maintained at all times.

It is noted that as a result of the Proposed Scheme the bus lane will be at between 0.51m to 0.62m closer to 62 Winston Ville and 0.62m to 0.7m closer to 62 Winston Ville compared to the existing situation.

vii. Disturbance Matters

As set out in Section 5.8.4 of Chapter 5 Construction, road closures and diversions will need to be carried out during the Construction Phase of the Proposed Scheme, however these measures will be minimised wherever possible. Where necessary, road closures and diversions will take into consideration the impact on road users, residents, businesses etc. Road closures and diversions will be carried out with regard to the Traffic Signs Manual. All road closures and diversions will be determined by the NTA, in consultation with the local authority and An Garda Síochána, as necessary. Access will be maintained for emergency vehicles along the Proposed Scheme, throughout the Construction Phase. As set out in Section 8 of Appendix A6.1 Traffic Impact Assessment, general traffic redistribution is not anticipated to be a significant issue during the construction phase, however there will be a requirement for some localised temporary road closures for short durations of the

daytime and / or night-time. Therefore, the impact on general traffic redistribution is anticipated to be a Medium Negative and temporary impact.

Similarly, as outlined in Section 5.1.6 of Appendix A5.1 Construction Environmental Management Plan (CEMP) of the EIAR, a Communications Plan in accordance with the NTA's requirements will be put in place by the contractor. This Plan will provide a mechanism for members of the public to communicate with the NTA and the appointed contractor, and for the NTA and the appointed contractor to communicate important information on various aspects of the Proposed Scheme to the public. The Plan will include procedures to inform members of the community directly affected by the Construction Phase on schedules for any activity of a particularly disruptive nature which is likely to impinge on their property such as boundary works, road closures and diversions, and any mitigating actions that are being taken to minimise such disruption.

In relation to modification of road levels, the design of the Proposed Scheme has been developed to a stage where all potential environmental impacts can be identified, and a fully informed environmental impact assessment can be carried out. The NTA (the Employer for the construction works) will set out the Employer's Requirements in the Construction Contract including all applicable mitigation measures identified in this EIAR, as well as additional measures required pursuant to conditions attached to any decision to grant approval. Procurement of the contractor will involve the determination that the appointed contractor is competent to carry out the works, including the effective implementation of the mitigation measures. The appointed contractor will be required to plan and construct the Proposed Scheme construction works in accordance with the Employer's Requirements, and the NTA will employ an Employer's Representative team with appropriate competence to administer and monitor the Construction Contract for compliance with the Employer's Requirements.

Response to each of the 24 issues raised

1. Permanent Land Acquisition

The NTA notes the objection of the permanent acquisition of land. Additional information has been provided in i) above in relation to the requirements for this land for the Proposed Scheme.

2. Temporary Land Acquisition

The NTA notes the objection of the permanent acquisition of land. Additional information has been provided in i) above in relation to the requirements for this land for the Proposed Scheme.

3. Noise

The NTA notes the comments raised in relation to Noise. Additional information has been provided in iv) above in relation to predicted noise impacts and mitigation measures that are being proposed to control the works throughout the Proposed Scheme and within the vicinity of the property.

4. Traffic Calming Measures

The NTA notes the comments raised in relation to Traffic Calming Measures. Additional information has been provided in iii) above in relation to traffic calming measures that have been implemented throughout the Proposed Scheme and within the vicinity of the property.

5. Road Closures

The NTA notes the objection raised in relation to Road Closures. Additional information has been provided in vii) above. As set out in Section 5.8.4 of Chapter 5 Construction, road closures and diversions will need to be carried out during the Construction Phase of the Proposed Scheme, however these measures will be minimised wherever possible. As set out in Section 8 of Appendix A6.1 Traffic Impact Assessment, general traffic redistribution is not anticipated to be a significant issue during the construction phase, however there will be a requirement for some localised temporary road closures for short durations of the daytime and / or night-time. Therefore, the impact on general traffic redistribution is anticipated to be a Medium Negative and temporary impact.

6. Access-General

The NTA notes the objection raised in relation to Access-General. Additional information has been provided in v) and vi) above in relation to future consultation with landowners subject to confirmation

of the CPO by An Bord Pleanála. As noted above, access and egress will be maintained at all times during the works.

7. Access Road Details

The NTA notes the comments raised in relation to Access Road Details. Additional information has been provided in v) and vi) above in relation to future consultation with landowners subject to confirmation of the CPO by An Bord Pleanála. As noted above, the principle of how residents can access/ egress their properties is generally unchanged following implementation of the Proposed Scheme.

8. Proximity to House

The NTA notes the comment raised in relation to Proximity to House. Additional information has been provided in vi) above. The proposed permanent acquisition at 62 Malahide Road ranges from 0.55m to 0.65m in width.

9. Drainage

The NTA notes the comments raised in relation to Drainage. Additional information has been provided in v) above. As noted in Section 13.4.5.1 of Chapter 13 Water in the EIAR, no potential changes to hydrology are predicted as the drainage design ensures no net increase in runoff rates during the operational phase. In terms of mitigation, a Surface Water Management Plan (SWMP) has been prepared (provided in the CEMP, Appendix A5.1 in Volume 4 of this EIAR), which details control and management measures for avoiding, preventing, or reducing any significant adverse impacts on the surface water environment during the Construction Phase of the Proposed Scheme.

10. Health and Safety

The NTA notes the comments raised in relation to Health and Safety. The requirements of the Safety, Health and Welfare at Work Act 2005, the Safety, Health and Welfare at Work (Construction) Regulations, 2013 and other relevant Irish and EU safety legislation will be complied with at all times. Additional information has been provided in ii) above in relation to access arrangements to the property during the works and the NTA's approach to communicating with residents during the works.

11. Screening and Planting

The NTA notes the objection raised in relation to Screening and Planting. Additional information has been provided in v) above. The NTA will prepare detailed accommodation works plans in consultation with impacted landowners upon confirmation of the CPO by An Bord Pleanála. As set out in Section 17.4.4.1.11 of Chapter 17 Landscape (Townscape) & Visual, the new boundary treatment will be reinstated at setback location. Overall, there would be a relatively small loss of private / garden area which will result in a partial loss of landscape amenity space, but there would be no notable change to the key characteristics of these properties.

12. Boundary Treatment

The NTA notes the comment raised in relation to Boundary Treatment. Additional information has been provided in v) above. The NTA will prepare detailed accommodation works plans in consultation with impacted landowners upon confirmation of the CPO by An Bord Pleanála. Section 4.6.18.1 of Chapter 4 Proposed Scheme Description describes the approach for boundary treatment. To maintain the character and setting of the Proposed Scheme, the approach to undertaking the new boundary treatment works along the corridor is replacement on a 'like for like' basis in terms of material selection and general aesthetics. Modifications to driveways and entrances will be guided by DCC's Parking Cars in Front Gardens Advisory Booklet (DCC 2011). Existing gates will be reused where possible however considerations will be required for the use of bifold gates, or other appropriate alternatives to mitigate impacts on parking in driveways. All gates will be hung such that they will open inwards onto the property, where practicable.

13. Road Levels

The NTA notes the objection raised in relation to Road Levels. Additional information has been provided in vii) above. The appointed contractor will be required to plan and construct the Proposed Scheme construction works in accordance with the Employer's Requirements as set out by the NTA,

and the NTA will employ an Employer's Representative team with appropriate competence to administer and monitor the Construction Contract for compliance with the Employer's Requirements.

14. Lighting

The NTA notes the comment raised in relation to Lighting. Additional information has been provided in v) above. Section 4.6.13 of Chapter 4 Proposed Scheme Description describes the approach taken for street lighting.

15. Road Alignment

The NTA notes the objection raised in relation to Road Alignment. Additional information has been provided in i) above. As set out in Section 17.4.4.1.11 of Chapter 17 Landscape (Townscape) & Visual, the new boundary treatment will be reinstated at setback location. Overall, there would be a relatively small loss of private / garden area which will result in a partial loss of landscape amenity space, but there would be no notable change to the key characteristics of these properties.

16. Setback Distances

The NTA notes the comment raised in relation to Setback Distances. The NTA will prepare detailed accommodation works plans in consultation with impacted landowners upon confirmation of the CPO by An Bord Pleanála. Additional information and set back distances from the proposed new boundary to key house features has been provided in vi) above. The proposed permanent acquisition at 62 Malahide Road ranges from 0.55m to 0.65m in width.

17. Services

The NTA notes the comment raised in relation to Services. Additional information has been provided in v) above.

18. Environmental Impacts

The NTA notes the comments raised in relation to Environmental Impacts. Additional information has been provided in iv) above. The Proposed Scheme has been assessed to not result in any significant residual effects during the Operational Phase.

19. Temporary Accommodation

The NTA notes the comments raised in relation to Temporary Accommodation. As reference v) above, the NTA will prepare detailed accommodation works plans in consultation with impacted landowners upon confirmation of the CPO by An Bord Pleanála. Additional information has been provided in vii) above.

20. Impact to Work

The NTA notes the comments raised in relation to Impact to Work. Additional information has been provided in vii) above. A Communications Plan will be put in place for the works. The Plan will include procedures to inform members of the community directly affected by the Construction Phase on schedules for any activity of a particularly disruptive nature which is likely to impinge on their property such as boundary works, road closures and diversions, and any mitigating actions that are being taken to minimise such disruption

21. Viability and Value

The NTA notes the comments raised in relation to Viability and Value. Additional information has been provided in i) above. The proposed permanent acquisition at 62 Malahide Road ranges from 0.55m to 0.65m in width.

22. Route Selection

The NTA notes the comments raised in relation to Route Selection. Additional information has been provided in i) above.

23. Legal, Design and Planning Matters

The NTA notes the comments raised in relation to Legal, Design and Planning Matters. As set out in v) above, the NTA will prepared detailed accommodation works plans in consultation with impacted landowners upon confirmation of the CPO by An Bord Pleanála.

24. Other Matters

The NTA notes the comments raised in relation to Other Matters. The NTA also notes the request for an Oral Hearing which will be a matter for An Bord Pleanála to determine.

06 - Gerard & Davina Murnaghan (CPO-07)

Issues raised

The submission included 24 numbered issues which have been summarised into the 7 key topics below and further discussed in subsequent sections.

- i. Land Acquisition
- ii. Health and Safety
- iii. Traffic Calming Measures
- iv. Noise & Environment
- v. Lack of Detail
- vi. Accommodation Works Comments
- vii. Disturbance matters

The issues raised are grouped and summarised below with original headings from the submission also provided (where different or grouped) for context:

- i. Land Acquisition (Permanent/Temporary Acquisition, Viability and Value, Proximity to House, Route Selection Issues, Road Alignment)

The submission does not accept either the permanent or temporary land acquisition proposed which they believe is in excess of what is required for the scheme. The submission has stated that the design of the road is such as to cause a severe negative impact on the viability and/or value and character of the buildings to such an extent that no amount of money will adequately compensate for the losses and damage to the operations and enjoyment of this property arising from this proposed new road scheme. The submission notes that the house is listed. The submission has stated that the proposed new road runs very close to their house to such an extent that it will be very difficult to reside there as intended when originally purchased. The submission raises a concern that alternative routes for the proposed works have not been adequately assessed to provide the service required while protecting the health and safety of the residents of Winston Ville and the local environment. The submission expresses the view that the scheme lacks imagination in using more bus lanes and traffic lights for buses over cars to avoid widening the road.

- ii. Health and Safety

The submission states that there are insufficient details provided in relation to the assessment of health and safety for their family and access to their property.

- iii. Traffic Calming Measures

The submission states that there are insufficient details provided on the new road way such as plans for speed bumps and other traffic calming measures.

- iv. Noise & Environment

The submission expresses the view that inadequate information is provided regarding the mitigation measures that are being proposed to control noise pollution, particularly bringing so much active traffic closer to their home as well as noise generated during the construction period.

The submission asserts that the road development will have significant environmental impacts causing irreversible damage to both the local environment fauna and flora, soil, water, air, climate, the landscape and human beings.

- v. Lack of Detail (Access -General, Services, Drainage, Lighting, Screening and Planting, Boundary Treatment).

The submission raises concerns about the level of detail in relation to access to their property via their electric gated driveways and pedestrian gates during and after the proposed works. The submission states that the level of detail provided is inadequate under a number of headings; services, drainage, lighting, screening and planting, setback distances and boundary treatment.

- vi. Accommodation Works Comments (Access Road Details, Setback Distances)

The submission raises concern about the proposal as their driveways would require new gated access to the property because of the works. The submission also raises concerns about the access to their property not being addressed in the proposal and no information on providing adequate space for a turning circle for their vehicles. The submission requests clarification on the setback distance for buildings from the roadway.

- vii. Disturbance Matters (Temporary Accommodation, Impact to Work, Road Closures, Road Levels)

The submission has set out that no attempt has been made to assist them with relocation to an alternative site or dwelling or to accommodate their family within the design of the Proposed Scheme. The submission also notes that they work remotely from home and note that the scheme will cause severe negative impact on their ability to remain focused during the construction of the proposed works. The submission has stated that they object to road closure and the potential for variation in road levels.

Response to key topics

- i. Land Acquisition

The proposed permanent acquisition at 62 Malahide Road ranges from 0.55m to 0.65m in width and the proposed permanent acquisition at 64 Malahide Road ranges from 0.51m to 0.55m width. A proposed 2.0m wide temporary acquisition is proposed for both properties to allow for building new boundary treatment and tie in the proposed scheme to the existing driveway. A new 2m wide footpath will be provided at this location and the road centreline will be adjusted.

In relation to the impacts on these properties, the environmental impact assessment for the Proposed Scheme has assessed the potential impacts at this location and further summarised below.

The present Malahide Road does not have an outbound bus lane at this location. The provision of a bus lane at this location will be key to ensuring a reliable and efficient service can be provided which can support the Proposed Scheme objectives. Chapter 3 of the EIAR, Consideration of Reasonable Alternatives, sets out the route options assessment process to determine the Preferred Route Option for the Proposed Scheme. As outlined in section 3.3.2.2 of Chapter 3 due consideration has been given to minimize impact on properties from Griffith Avenue to Clontarf Road where the road cross section is particularly constrained. It was not considered feasible to provide dedicated bus, cycle and traffic lanes in both directions along this section, as this would have had a greater impact on residential properties in the area including the removal of off-street parking in the front of a number of the properties with no suitable alternatives available. Section 3.4.1.2 of Chapter 3 also outlines that Signal Controlled Priority on the inbound carriageway between Charlemont Road and Crescent Place was considered. In reviewing this proposal, and taking the Proposed Scheme objectives into account, it is considered that while there is benefit in the reduction of land take and disturbance to residences, they do however have a significant disadvantage in regard to ensuring Bus Priority. The junction of Clontarf Road and the Malahide Road is currently operating at capacity and it is considered that there is a high possibility of vehicles queuing back to Crescent Place and thus preventing inbound buses re-joining the Bus Lane. This would impact the reliability and punctuality of the inbound buses. For these reasons a dedicated bus lane is proposed to meet the objective to enhance the capacity and potential of the public transport system to provide priority to bus movement over general traffic movements.

Table 16.7 of Chapter 16 Architectural Heritage outlines the locations of the Protected Structures along the Proposed Scheme which includes the referenced RPS 4852-3 houses at 62 and 64 Malahide Road. The impact of the proposed works at this location is set out in section 16.4.3.1 which notes that the current boundary is not the original and the railings, gates and capping stones have been previously replaced with good quality replicas and vehicular entrances have been added. As set out in Section 17.4.4.1.11 of Chapter 17 Landscape (Townscape) & Visual, the new boundary treatment will be reinstated at setback location. Overall, there would be a relatively small loss of private / garden area which will result in a partial loss of landscape amenity space, but there would be no notable change to the key characteristics of these properties.

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on each landowner whose land is being acquired. Following service of the Notice to Treat, each landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage their own agent / valuer in preparing, negotiating and advising on compensation.

ii. Health and Safety

As described in paragraph 5.5.3.1 of Chapter 5 of Volume 2 of the EIAR, details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. The duration of the works will vary from property to property, however access and egress will be maintained at all times.

Similarly, as outlined in Section 5.1.6 of Appendix A5.1 Construction Environmental Management Plan (CEMP) of the EIAR, a Communications Plan in accordance with the NTA's requirements will be put in place by the contractor. This Plan will provide a mechanism for members of the public to communicate with the NTA and the appointed contractor, and for the NTA and the appointed contractor to communicate important information on various aspects of the Proposed Scheme to the public. The Plan will include procedures to inform members of the community directly affected by the Construction Phase on schedules for any activity of a particularly disruptive nature which is likely to impinge on their property such as boundary works, road closures and diversions, and any mitigating actions that are being taken to minimise such disruption.

iii. Traffic Calming Measures

Drawings showing layouts relating to road marking, layout and traffic signalling are included Volume 3 Figures, Chapter 4 Proposed Scheme Description of the EIAR. It is noted that there are no speed humps on the Malahide Road in the vicinity of 62/64 Malahide Road however there are a number of raised table crossings on side roads such as Charlemont Road, Brian Road, Marino Avenue all within the vicinity to 62/64 Malahide Road.

There are a number of traffic calming measures that have been implemented in the Proposed Scheme that will reduce speeds including improved junction layouts with reduced corner radii, narrow carriageway lane widths, raised table crossings on side roads, proposed speed limit reduction at the outer dual carriageway portion of the Proposed Scheme from 60kmph to 50kmph and speed humps on side streets (e.g. St Brendan's Avenue). The additional landscaping and enhanced pedestrian/ cyclist priority measures along the Proposed Scheme will also lend themselves to the principles of self-regulating streets as set out in DMURS to encourage lower driving speeds.

iv. Noise & Environment

Figures 9.3 to Figures 9.5 of Chapter 9 of Volume 3 of the EIAR indicate the predicted noise impacts in relation to the Proposed Scheme.

- Figure 9.3 Construction Traffic Noise Impact Summary Sheet 3 of 3, assesses the impact as not significant at this location.
- Figure 9.4 Opening Year 2028 Traffic Noise Impact Summary Sheet 3 of 3, assesses the impact as Imperceptible/Positive at this location
- Figure 9.5 Design Year 2043 Traffic Noise Impact Summary Sheet 3 of 3, assesses the impact as Imperceptible/Positive at this location.

With regard to operational noise impacts, Section 9.4.4.1.1.5 of the EIAR Chapter 9 Noise and Vibration notes along the Proposed Scheme, a direct, positive, imperceptible to slight, short to medium term impact is calculated for the 2028 opening year as a result of reduction in overall traffic volumes through the incorporation of bus priority signals and junctions, restricted turning movements for private vehicles and the incorporation of dedicated bus lanes, cycle lanes and footpaths. Similarly, along the Proposed Scheme, a direct, positive, imperceptible to slight, long-term impact is calculated for the design year 2043. The overall significance ratings are lower for the design year compared to the year of opening due to:

- The magnitude of change ratings for the long term period are less significant compared to the year of opening due to the recognised habituation to traffic noise environment over time; and
- Overall traffic volumes forecast along the core bus corridor and surrounding road network are reduced during the design year compared to the opening year due to modal shift to public transport.

It is likely that a further reduction in overall noise level will occur along the Proposed Scheme due to the transition towards a full EV and HEV bus fleet, this reduction will occur irrespective of the Proposed Scheme.

With regard to construction impacts, where reasonably practicable to do so, works will be carried out during normal working hours and in consultation with local residents as described previously under Health and Safety issue.

As set out in Appendix A5.1 Construction Environmental Management Plan (CEMP) of the EIAR, there are a number of specific noise mitigation and monitoring measures that will be implemented including the following:

NV2: The appointed contractor will put in place the most appropriate noise control measures depending on the level of noise reduction required at individual working areas i.e., based on the construction threshold values for noise and vibration set out in Tables 9.7 and 9.10 in Chapter 9 (Noise & Vibration) of this EIAR. Reference to Table 9.37 in Chapter 9 (Noise & Vibration) of this EIAR indicates that intrusive works occurring within 25m to 45m of Noise Sensitive Locations (NSLs) will need specific noise control measures to reduce impacts depending on the time period over which they will occur, i.e., daytime or evening.

NV8: Construction activities will be scheduled in a manner that reflects the location of the site and the nature of neighbouring properties. Construction activities / plant or equipment items will be considered with respect to their potential to exceed construction noise thresholds at NSLs and will be scheduled according to their noise level, proximity to sensitive locations and possible options for noise control. In situations where an activity with potential for exceedance of construction noise thresholds is scheduled (e.g., road widening and utility diversions or activities with similar noise levels identified in Table 9.22 in Chapter 9 (Noise & Vibration) of this EIAR). Other construction activities associated with the Proposed Scheme will be scheduled to avoid significant cumulative noise levels

NV9: The NTA will establish clear forms of communication that will involve the appointed contractor and NSLs in proximity to the works so that residents or building occupants are aware of the likely duration of activities likely to generate noise or vibration that are potentially significant as set out in Table 9.7 and Table 9.10 in Chapter 9 of this EIAR.

NV10: During the Construction Phase the appointed contractor will carry out noise monitoring at representative NSLs to evaluate and inform the requirement and / or implementation of noise management measures. Noise monitoring will be conducted in accordance with International Organization for Standardization (ISO) 1996–1 (ISO 2016) and ISO 1996–2 (ISO 2017). The selection of monitoring locations will be based on the nearest representative NSLs to the working area which will progress along the length of the Proposed Scheme.

With regard to environmental impacts for the Proposed Scheme, the Environmental Impact Assessment Report (EIAR) has assessed these impacts in each of the assessment chapters and summarised in Table 23.1: Summary of Significant Residual Impacts from the Construction and Operational Phases of the Proposed Scheme of the EIAR Volume 2 of 4 Main Report for the operational phase. It is noted that for;

- **Fauna and Flora** – this is assessed in Chapter 12 Biodiversity of the EIAR. As stated in Section 12.6.2 following the implementation of the mitigation measures the Proposed Scheme will not result in any significant residual effects during the Operational Phase.
- **Soil** – this is assessed in Chapter 14 Land Soils Geology & Hydrogeology of the EIAR. As stated in Section 14.6.2 no significant residual impacts on land, soils, geology and hydrogeology as a result of the operation of the Proposed Scheme
- **Water** – this is assessed in Chapter 13 Water of the EIAR. As stated in Section 13.6.2 no significant residual impacts have been identified in the Operational Phase of the Proposed Scheme.
- **Air** – this is assessed in Chapter 7 Air Quality of the EIAR. As stated in Section 7.6.2 no significant residual impacts have been identified during the Operational Phase of the Proposed Scheme.
- **Climate** – this is assessed in Chapter 8 Climate of the EIAR. As stated in Section 8.8.2 the Proposed Scheme will make a significant contribution to reduction in carbon emissions.
- **Landscape** – this is assessed in Chapter 17 Landscape (Townscape) & Visual of the EIAR. As noted in Section 17.6.2 the impact on No.62 and 64 Malahide Road is deemed to be moderate long term and negative.
- **Human Health** – this is assessed in Chapter 10 Population and in Appendix A10.2 of the EIAR. As noted in Section 10.6.2 the Proposed Scheme will deliver positive impacts in terms of accessibility to commercial businesses for pedestrians, cyclists and bus users during the operational phase.

v. Lack of Detail

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage your its agent / valuer in preparing, negotiating and advising on compensation. Reinstatement of property frontage including boundary walls, gates, railings, driveway, footpath and landscaping will be on a like for like basis and detailed accommodation works plans will be prepared in consultation with landowners in line with any formal agreements and in accordance with any embedded mitigations identified in the EIAR or conditions/modifications from An Bord Pleanála in relation to the Proposed Scheme application.

In relation to information relating to services, drainage, lighting, screening and planting, setback distances and boundary treatment drawings have been included in Volume 3 Figures, and summary text is provided in Chapter 4 Proposed Scheme Description of the EIAR.

- **Services** – The following drawing series provide information in relation to trunk services as provided in Volume 3 Figures in the EIAR : Combined Existing Utilities Records, Telecommunications Asset Alterations, Irish Water Asset Alterations, Gas Networks Ireland Asset Alterations, Irish Water Fowl Sewer Asset Alterations, Proposed Surface Water Drainage Works. Chapter 19 Material Assets in Volume 2 of the EIAR also provides narrative in relation to the proposed works for each of these services.
- **Drainage** – The Proposed Surface Water Drainage Works drawing series in Volume 3 Figures in the EIAR provides information in relation trunk drainage. Section 4.6.15 of Chapter 4 Proposed Scheme Description describes the approach taken for drainage. Chapter 13 Water in Volume 2 of the EIAR also provides additional information in relation to the impact of the proposed drainage works. Supplementary information is also provided in Appendix K Drainage Design Basis Document of the Preliminary Design Report.
- **Lighting**– The Street Lighting drawing series in Volume 3 Figures in the EIAR provides information in relation street lighting. Section 4.6.13 of Chapter 4 Proposed Scheme Description describes the approach taken for street lighting.
- **Screening and Planting** – The Landscaping General Arrangement drawing series in Volume 3 Figures in the EIAR provides information in relation screening and planting. Section 4.6.12 of

Chapter 4 Proposed Scheme Description describes the approach taken for landscape and urban realm.

- **Boundary Treatment** - The Fencing and Boundary Treatment drawing series in Volume 3 Figures in the EIAR provides information in relation boundary treatment. Section 4.6.18.1 of Chapter 4 Proposed Scheme Description describes the approach for boundary treatment.

vi. Accommodation Works Comments

Regarding access to 62 and 64 Malahide Road, it is noted that there is presently a bus lane located outside these properties, as such the principle of how residents can access/ egress their properties is generally unchanged following implementation of the Proposed Scheme. The proposed permanent acquisition at 62 Malahide Road ranges from 0.55m to 0.65m in width and the proposed permanent acquisition at 64 Malahide Road ranges from 0.51m to 0.55m width. This is unlikely to have a significant impact on the effective parking area in comparison to the present situation. The approximate setback distances from the footpath side of the proposed new boundary to the existing building features are provided in Figure 2.6.2 below.

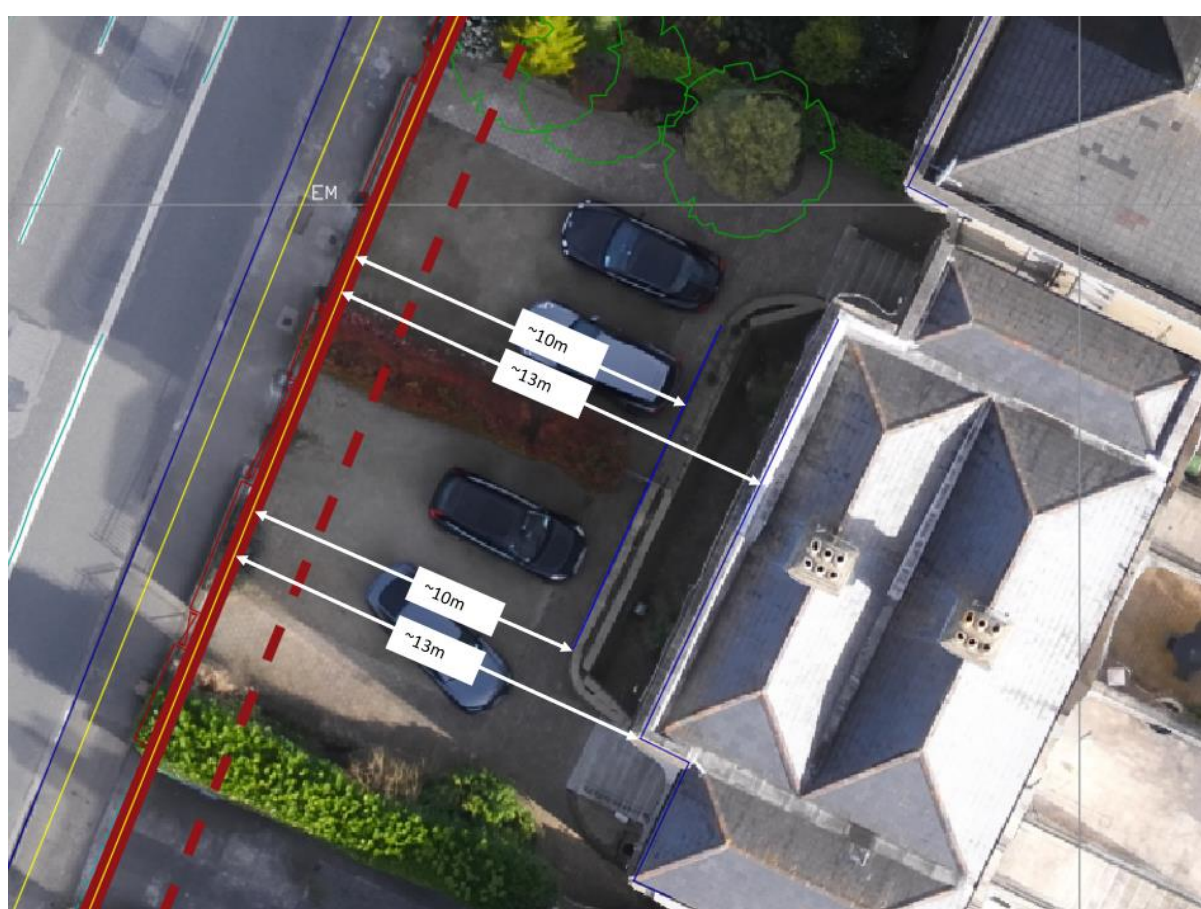


Figure 2.6.2: Proposed set back distances at Winston Ville 64 and 62 Malahide Road

As set out in Section 17.4.4.1.11 of Chapter 17 Landscape (Townscape) & Visual, the new boundary treatment will be reinstated at setback location. Overall, there would be a relatively small loss of private / garden area which will result in a partial loss of landscape amenity space, but there would be no notable change to the key characteristics of these properties.

During the course of the works, it is likely that there will be some temporary disruption / alterations, and access to premises in certain times. As described in paragraph 5.5.3.1 of Chapter 5 of Volume 2 of the EIAR, details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area. The duration of the works will vary from property to property, but access and egress will be maintained at all times.

It is noted that as a result of the Proposed Scheme the bus lane will be at between 0.51m to 0.62m closer to 62 Winston Ville and 0.62m to 0.7m closer to 62 Winston Ville compared to the existing situation.

vii. Disturbance Matters

As set out in Section 5.8.4 of Chapter 5 Construction, road closures and diversions will need to be carried out during the Construction Phase of the Proposed Scheme, however these measures will be minimised wherever possible. Where necessary, road closures and diversions will take into consideration the impact on road users, residents, businesses etc. Road closures and diversions will be carried out with regard to the Traffic Signs Manual. All road closures and diversions will be determined by the NTA, in consultation with the local authority and An Garda Síochána, as necessary. Access will be maintained for emergency vehicles along the Proposed Scheme, throughout the Construction Phase. As set out in Section 8 of Appendix A6.1 Traffic Impact Assessment, general traffic redistribution is not anticipated to be a significant issue during the construction phase, however there will be a requirement for some localised temporary road closures for short durations of the daytime and / or night-time. Therefore, the impact on general traffic redistribution is anticipated to be a Medium Negative and temporary impact.

Similarly, as outlined in Section 5.1.6 of Appendix A5.1 Construction Environmental Management Plan (CEMP) of the EIAR, a Communications Plan in accordance with the NTA's requirements will be put in place by the contractor. This Plan will provide a mechanism for members of the public to communicate with the NTA and the appointed contractor, and for the NTA and the appointed contractor to communicate important information on various aspects of the Proposed Scheme to the public. The Plan will include procedures to inform members of the community directly affected by the Construction Phase on schedules for any activity of a particularly disruptive nature which is likely to impinge on their property such as boundary works, road closures and diversions, and any mitigating actions that are being taken to minimise such disruption.

In relation to modification of road levels, the design of the Proposed Scheme has been developed to a stage where all potential environmental impacts can be identified, and a fully informed environmental impact assessment can be carried out. The NTA (the Employer for the construction works) will set out the Employer's Requirements in the Construction Contract including all applicable mitigation measures identified in this EIAR, as well as additional measures required pursuant to conditions attached to any decision to grant approval. Procurement of the contractor will involve the determination that the appointed contractor is competent to carry out the works, including the effective implementation of the mitigation measures. The appointed contractor will be required to plan and construct the Proposed Scheme construction works in accordance with the Employer's Requirements, and the NTA will employ an Employer's Representative team with appropriate competence to administer and monitor the Construction Contract for compliance with the Employer's Requirements.

Response to each of the 24 issues raised

1. Permanent Land Acquisition

The NTA notes the objection of the permanent acquisition of land. Additional information has been provided in i) above in relation to the requirements for this land for the Proposed Scheme.

2. Temporary Land Acquisition

The NTA notes the objection of the permanent acquisition of land. Additional information has been provided in i) above in relation to the requirements for this land for the Proposed Scheme.

3. Health and Safety

The NTA notes the comments raised in relation to Health and Safety. The requirements of the Safety, Health and Welfare at Work Act 2005, the Safety, Health and Welfare at Work (Construction) Regulations, 2013 and other relevant Irish and EU safety legislation will be complied with at all times. Additional information has been provided in ii) above in relation to access arrangements to the property during the works and the NTA's approach to communicating with residents during the works.

4. Traffic Calming Measures

The NTA notes the comments raised in relation to Traffic Calming Measures. Additional information has been provided in iii) above in relation to traffic calming measures that have been implemented throughout the Proposed Scheme and within the vicinity of the property.

5. Noise

The NTA notes the comments raised in relation to Noise. Additional information has been provided in iv) above in relation to predicted noise impacts and mitigation measures that are being proposed to control the works throughout the Proposed Scheme and within the vicinity of the property.

6. Access-General

The NTA notes the objection raised in relation to Access-General. Additional information has been provided in v) and vi) above in relation to future consultation with landowners subject to confirmation of the CPO by An Bord Pleanála. As noted above, access and egress will be maintained at all times during the works.

7. Access Road Details

The NTA notes the comments raised in relation to Access Road Details. Additional information has been provided in v) and vi) above in relation to future consultation with landowners subject to confirmation of the CPO by An Bord Pleanála. As noted above, the principle of how residents can access/ egress their properties is generally unchanged following implementation of the Proposed Scheme.

8. Services

The NTA notes the comment raised in relation to Services. Additional information has been provided in v) above.

9. Drainage

The NTA notes the comments raised in relation to Drainage. Additional information has been provided in v) above. As noted in Section 13.4.5.1 of Chapter 13 Water in the EIAR, no potential changes to hydrology are predicted as the drainage design ensures no net increase in runoff rates during the operational phase. In terms of mitigation, a Surface Water Management Plan (SWMP) has been prepared (provided in the CEMP, Appendix A5.1 in Volume 4 of this EIAR), which details control and management measures for avoiding, preventing, or reducing any significant adverse impacts on the surface water environment during the Construction Phase of the Proposed Scheme.

10. Road Closures

The NTA notes the objection raised in relation to Road Closures. Additional information has been provided in vii) above. As set out in Section 5.8.4 of Chapter 5 Construction, road closures and diversions will need to be carried out during the Construction Phase of the Proposed Scheme, however these measures will be minimised wherever possible. As set out in Section 8 of Appendix A6.1 Traffic Impact Assessment, general traffic redistribution is not anticipated to be a significant issue during the construction phase, however there will be a requirement for some localised temporary road closures for short durations of the daytime and / or night-time. Therefore, the impact on general traffic redistribution is anticipated to be a Medium Negative and temporary impact.

11. Screening and Planting

The NTA notes the objection raised in relation to Screening and Planting. Additional information has been provided in v) above. The NTA will prepare detailed accommodation works plans in consultation with impacted landowners upon confirmation of the CPO by An Bord Pleanála. As set out in Section 17.4.4.1.11 of Chapter 17 Landscape (Townscape) & Visual, the new boundary treatment will be reinstated at setback location. Overall, there would be a relatively small loss of private / garden area which will result in a partial loss of landscape amenity space, but there would be no notable change to the key characteristics of these properties.

12. Boundary Treatment

The NTA notes the comment raised in relation to Boundary Treatment. Additional information has been provided in v) above. The NTA will prepare detailed accommodation works plans in consultation with impacted landowners upon confirmation of the CPO by An Bord Pleanála. Section 4.6.18.1 of Chapter 4 Proposed Scheme Description describes the approach for boundary treatment. To maintain the character and setting of the Proposed Scheme, the approach to undertaking the new boundary treatment works along the corridor is replacement on a 'like for like' basis in terms of material selection and general aesthetics. Modifications to driveways and entrances will be guided by DCC's Parking Cars in Front Gardens Advisory Booklet (DCC 2011). Existing gates will be reused where possible however considerations will be required for the use of bifold gates, or other appropriate alternatives to mitigate impacts on parking in driveways. All gates will be hung such that they will open inwards onto the property, where practicable.

13. Road Levels

The NTA notes the objection raised in relation to Road Levels. Additional information has been provided in vii) above. The appointed contractor will be required to plan and construct the Proposed Scheme construction works in accordance with the Employer's Requirements as set out by the NTA, and the NTA will employ an Employer's Representative team with appropriate competence to administer and monitor the Construction Contract for compliance with the Employer's Requirements.

14. Lighting

The NTA notes the comment raised in relation to Lighting. Additional information has been provided in v) above. Section 4.6.13 of Chapter 4 Proposed Scheme Description describes the approach taken for street lighting.

15. Road Alignment

The NTA notes the objection raised in relation to Road Alignment. Additional information has been provided in i) above. As set out in Section 17.4.4.1.11 of Chapter 17 Landscape (Townscape) & Visual, the new boundary treatment will be reinstated at setback location. Overall, there would be a relatively small loss of private / garden area which will result in a partial loss of landscape amenity space, but there would be no notable change to the key characteristics of these properties.

16. Setback Distances

The NTA notes the comment raised in relation to Setback Distances. The NTA will prepare detailed accommodation works plans in consultation with impacted landowners upon confirmation of the CPO by An Bord Pleanála. Additional information and set back distances from the proposed new boundary to key house features has been provided in vi) above. The proposed permanent acquisition at 64 Malahide Road ranges from 0.51m to 0.55m width.

17. Proximity to House

The NTA notes the comment raised in relation to Proximity to House. Additional information has been provided in vi) above. The proposed permanent acquisition at 64 Malahide Road ranges from 0.51m to 0.55m width.

18. Viability and Value

The NTA notes the comments raised in relation to Viability and Value. Additional information has been provided in i) above. The proposed permanent acquisition at 64 Malahide Road ranges from 0.51m to 0.55m width.

19. Temporary Accommodation

The NTA notes the comments raised in relation to Temporary Accommodation. As referenced in v) above, the NTA will prepare detailed accommodation works plans in consultation with impacted landowners upon confirmation of the CPO by An Bord Pleanála. Additional information has been provided in vii) above.

20. Impact to Work

The NTA notes the comments raised in relation to Impact to Work. Additional information has been provided in vii) above. A Communications Plan will be put in place for the works. The Plan will include

procedures to inform members of the community directly affected by the Construction Phase on schedules for any activity of a particularly disruptive nature which is likely to impinge on their property such as boundary works, road closures and diversions, and any mitigating actions that are being taken to minimise such disruption.

21. Environmental Impacts

The NTA notes the comments raised in relation to Environmental Impacts. Additional information has been provided in iv) above. The Proposed Scheme has been assessed to not result in any significant residual effects during the Operational Phase.

22. Route Selection

The NTA notes the comments raised in relation to Route Selection. Additional information has been provided in i) above.

23. Legal, Design and Planning Matters

The NTA notes the comments raised in relation to Legal, Design and Planning Matters. As set out in v) above, the NTA will prepared detailed accommodation works plans in consultation with impacted landowners upon confirmation of the CPO by An Bord Pleanála.

24. Other Matters

The NTA notes the comments raised in relation to Other Matters. The NTA also notes the request for an Oral Hearing which will be a matter for An Bord Pleanála to determine.

2.6.5 Other Locations

65 – Caroline O’Hara (CPO-19)

Issues raised

This submission raises six potential issues:

i. Restriction / Interference

The submission is concerned about the disruption to the access to their property during the construction of the Proposed Scheme.

ii. Potential Damage

The submission is concerned about damage caused to their property due to construction works in close proximity to the property

iii. Loss of driveway / parking space

The submission is concerned about the loss of driveway/ parking space from the CPO required as part of the Proposed Scheme.

iv. Safety

The submission is concerned about reduced safety while accessing their property by virtue of having to cross the proposed cycle track.

v. Noise Pollution

The submission is concerned about the noise pollution increasing due to the Proposed Scheme bring traffic closer to the property.

vi. Value of Property

The submission is concerned about the fall in value of their property as a result of the five points above.

Response

The following are the responses to the six issues raised.

i. Restriction / Interference

In order to accommodate the necessary road cross section for the Proposed Scheme at this property the width of land to be acquired is approximately 1.7m and will require the demolition and reconstruction of two concrete pillars and 1 pedestrian gate, with the new footpath being constructed 1.7m closer to the property.

It is acknowledged that during the construction of the works there will be inconveniences for all users but this will be managed to minimised impacts for all affected parties. The duration of the works will vary from property to property, but access and egress will be maintained at all times. As described in paragraph 5.5.3.1 of Chapter 5 Construction of Volume 2 of the EIAR, details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area. When roads and streets are being upgraded, there will be some temporary disruption / alterations to on-street and off-street parking provision, and access to premises in certain locations along the Proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times.

ii. Potential Damage

The proposed bus lane will be moved only 0.2m closer to property, but a new footpath will be constructed 1.7m closer to the property to accommodate a new cycle track. It is not envisioned that the construction of the new footpath, cycle track or bus lane would cause any damage to the property.

Section 9.5.1.2 of Chapter 9 Noise and Vibration of Volume 2 of the EIAR describes the likely vibration levels associated with construction activities, it is considered that the construction of the

Proposed Scheme is not expected to give rise to vibration that is either significantly intrusive or capable of giving rise to structural or cosmetic damage to buildings. Vibration from construction activities will be limited to the values set out in Table 9.10 to avoid any form of potential cosmetic damage to buildings and structures. Monitoring will be undertaken at identified sensitive buildings, where proposed works have the potential to be at or exceed the vibration limit values in Table 9.10.- Recommended Construction Vibration Thresholds for Buildings.

iii. Loss of driveway / parking space

The Permanent acquisition will result in the loss of approximately 1.7m with an additional 2.0m temporarily required to allow for the construction of boundary treatment and tying into the existing garden/driveway.

The existing 5.3m wide road frontage boundary will be at least 6.0m from the front of the house. This will not hinder the parking of a car at this location relative to the existing arrangement.

iv. Safety

It is noted that there is an existing bus lane in operational outside the property. This is retained in the Proposed Scheme and new cycle track is proposed between the bus lane and the new footpath. This new layout will not change the existing access arrangements. The Safety Audits undertaken for the Proposed Scheme, included as Appendix M of the Preliminary Design Report provided in the Supplementary Information did not highlight any safety issues with the proposed arrangement in this regard.

v. Noise Pollution

The provision of the new cycletrack at this location along the line of the existing footpath that vehicular traffic, in particular the bus lane will be at most approximately 0.2m closer to the property compared to the existing situation.

The impact of the proposed scheme on Noise has been assessed as Imperceptible / Positive as shown in Figures 9.2 to Figures 9.5 of Chapter 9 of Volume 3 of the EIAR, in the vicinity of the monitoring locations CBC0001ANML06 and CBC0001ANML07 as shown in Figure 9.2 of Chapter 9 of Volume 3 of the EIAR.

vi. Value of Property

As regards the view expressed that the combined impact of all the issues raised would have an adverse and negative impact on the property value, EIAR Chapter 10 Population includes Appendix A10.2 Economic Impact of the Core Bus Corridors. Section 3 on page 14 the appendix discusses the impact of the Proposed Scheme on property prices. The conclusion reached is that in overall terms the public realm improvements planned by the NTA may lead to an increase in value of both residential and retail property prices, especially in the community centres along the corridors, with evidence showing that investing in public realm creates nicer places that are more desirable for people and business to locate in, thereby increasing the value of properties in the area.

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage your its agent / valuer in preparing, negotiating and advising on compensation.

76 - Kieran Tumulty & Danielle O'Riordan (CPO-16)

Issues raised

i. Loss of car parking spaces

The submission states that the property has space to park two vehicles, which are both used on a daily basis, and that the CPO will result in the loss of at least one and potentially both car parking spaces. It also raises concerns about the lateness of the notice that they received concerning the CPO, as well as citing concerns about deliveries and future parking of their vehicles.

ii. Noise and potential structural damage

The submission expresses concern that the bus traffic will increase outside their house with an associated increase in noise and vibration. It also raises concern about potential structural damage to the property as traffic will be closer to the building.

iii. Loss of front garden / changes to aesthetics of front of house

The submission states that the CPO will lead to the loss of mature shrubbery providing privacy and sound proofing the front of the property, as well as the original iron railings that form part of the boundary wall, leaving the property exposed.

iv. Inconvenience of works and temporary use of front garden

It also raises a concern about a temporary restriction to their right of access to their property, including car parking and access to a secure covered porch area.

v. Overall impact on value of property

The submission raises a concern that the CPO will have an adverse effect on the value of the property, noting that there is no other land to the rear of the property available for parking or vehicular access.

Response

The following are the responses to the three issues raised.

i. Loss of car parking spaces

The permanent acquisition will result in the loss of approximately 0.8m strip of land with an additional 2.0m temporarily required to allow for the construction of boundary treatment and tying into the existing garden/driveway.

The existing 10.0m wide front boundary will be at least 7.2m from the front of the house. This will not hinder the parking of cars as accommodated at present but there will be the loss of the planted area on the house side of the front boundary wall.

In relation to the late receipt of the CPO notice, the NTA's property title research is primarily carried out in both the Land Registry and the Registry of Deeds, both of which fall under the remit of the Property Registration Authority of Ireland (PRAI). In some instances, as was the case for this property, the NTA may become aware that a party has advised that they own the property but the PRAI have a different party registered as the owner. As soon as the NTA became aware of this, the decision was taken to include both parties in the CPO schedules. Representatives of the NTA immediately made contact with the new owners, visited the property and explained the situation and process. Following this, the required notification was duly issued, thereby providing the new owners with the opportunity to make a submission.

ii. Noise and Potential structural damage

The permanent land acquisition will result in the loss of approximately 0.6m strip of land with an additional 2.0m temporarily required to allow for the construction of boundary treatment and tying into

the existing garden/driveway. The proposed new road alignment will move the bus lane about 0.5m closer to the property.

It is noted that as a result of continuing the cycle track along the line of the existing footpath that vehicular traffic, in particular the bus lane will be at most approximately 0.5m closer to the property compared to the existing situation.

In relation to the impact of the proposed scheme on Noise this has been assessed as Imperceptible / Positive in the vicinity of 28 Malahide Road as shown in Figures 9.2 to Figures 9.5 of Chapter 9 Noise and Vibration of Volume 3 of the EIAR. 28 Malahide Road is in close proximity to the monitoring location CBC0001ANML009 as shown in Figure 9.2 of Chapter 9 of Volume 3 of the EIAR.

Section 9.5.1.2 of Volume 2 of Chapter 9 of Volume 2 of the EIAR describes the likely vibration levels associated with construction activities, it is considered that the construction of the Proposed Scheme is not expected to give rise to vibration that is either significantly intrusive or capable of giving rise to structural or cosmetic damage to buildings. Vibration from construction activities will be limited to the values set out in Table 9.10 to avoid any form of potential cosmetic damage to buildings and structures. Monitoring will be undertaken at identified sensitive buildings, where proposed works have the potential to be at or exceed the vibration limit values in Table 9.10.-Recommended Construction Vibration Thresholds for Buildings.

- iii. Loss of front garden / changes to aesthetics of front of house.

Number 28 Malahide Road has been specifically assessed in the in the EIAR (Chapter 16, Architectural Heritage). The house forms part of the mid-19th century Marino Terrace (the feature is identified as CBC0001BTH025 in the architectural heritage assessment) on Malahide Road, Dublin 3. The terrace was built c.1860. Consultation of Dublin City Development Plan 2016-2022 and draft Dublin City Development Plan 2022-2028 indicates that the terrace is not included in the Record of Protected Structures nor are they in an Architectural Conservation Area. They are not included in the published National Inventory of Architectural Heritage inventory for Dublin. However, notwithstanding that Number 28 does not have an architectural heritage designation, it is acknowledged to be of architectural heritage interest.

The architectural heritage assessment considered the factors which contribute the architectural heritage interest of the terrace including their architectural composition and craftsmanship or artistic interest, and their contribution to the streetscape as part of a larger group of terraced buildings along the Malahide Road. They were assessed in Section 16.3.1.9 of Chapter 16 (Architectural Heritage) and in Section 2.5.2 of Appendix A16.2 Inventory of Architectural Heritage Sites in Volume 4 of the EIAR as being of Regional architectural heritage interest and Medium sensitivity for their architectural and artistic interest. It was noted that part of the original boundary treatment to Number 28, including the original gates have been previously removed to provide vehicular access.

It is acknowledged in Chapter 16 of the EIAR (Section 16.4.3.6) that there will need to be temporary land-take required from the property to allow for the removal and replacement of the existing boundary and that this land-take coupled with the removal/replacement of the boundary will result in a direct negative impact.

Under the proposed mitigation set out in Section 16.5.1.3 of Chapter 16 (Architectural Heritage) of the EIAR, the existing historic boundary treatment to Marino Terrace, numbers 24, 26 and 28 Malahide Road, consisting of the historic railings, gates and plinths or walling will be recorded by an architectural heritage specialist who will also oversee the labelling, taking-down, safe storage and reinstatement of the affected historic fabric. Works to historic fabric will be carried out in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR. The design of the new boundary treatments will be agreed in consultation with affected householders and the NTA.

With the provision of a coherent and appropriate boundary treatment to the terrace it is considered that there will be a positive impact on its coherence as a group, and on the streetscape in architectural heritage terms.

In addition, the impact on No. 28 Malahide Road is assessed in Chapter 17 (Landscape and Visual). It is acknowledged that there will be temporary land take required during the construction phase

(Section 17.4.1.2) and that there will be a reduced area of private space/garden when the scheme is operational (section 17.4.1.3). The townscape / streetscape and visual effect of the Operational Phase on Number 28 will be Moderate / Significant, Long-Term, Negative (Table 17.11).

iv. Inconvenience of works and temporary use of front garden

It is acknowledged that during the construction of the works there will be inconveniences for all users but this will be managed to minimised impacts for all affected parties. The duration of the works will vary from property to property, but access and egress will be maintained at all times. As described in paragraph 5.5.3.1 of Chapter 5 Construction of Volume 2 of the EIAR, details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area. When roads and streets are being upgraded, there will be some temporary disruption / alterations to on-street and off-street parking provision, and access to premises in certain locations along the Proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times.

v. Overall impact on value of property

As regards the view expressed that the combined impact of all the issues raised would have an adverse and negative impact on the property value, EIAR Chapter 10 Population includes Appendix A10.2 Economic Impact of the Core Bus Corridors. Section 3 on page 14 the appendix discusses the impact of the Proposed Scheme on property prices. The conclusion reached is that in overall terms the public realm improvements planned by the NTA may lead to an increase in value of both residential and retail property prices, especially in the community centres along the corridors, with evidence showing that investing in public realm creates nicer places that are more desirable for people and business to locate in, thereby increasing the value of properties in the area.

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage your its agent / valuer in preparing, negotiating and advising on compensation.

3. Response to Objections to the Compulsory Purchase Order (CPO)

3.1 Overview of Objections

This chapter of the report addresses the 30 written objections that were received by the Board against the Proposed Scheme under ABP Case Number ABP-313279 within the prescribed period for making of objections. Refer to Section 1.2 of this report for a high level summary overview of the CPO objections and relevant association with submissions in relation to the Proposed Scheme application.

The original ABP numbering of individual objection letters has been maintained for continuity and ease of reference throughout, see Table 3.1.1 below.

Table 3.1.1: ABP CPO numbering by geographic location

CPO Ref No.	Location	CPO Ref No.	Location	CPO Ref No.	Location	CPO Ref No.	Location
1	Artane Cottages Lower	9	Artane Cottages Lower	17	The Mornington Center	25	Maypark
2	6 Artane Cottages Upper	10	Artane Cottages Lower	18	Maypark	26	Maypark
3	Artane Cottages Lower	11	Mornington Park	19	210 Malahide Road	27	Maypark
4	Mornington Park	12	Artane Cottages Lower	20	The Goblet Bar and Lounge	28	Maypark
5	Artane Cottages Lower	13	Artane Cottages Lower	21	Mornington Park	29	Maypark
6	Maypark	14	Artane Cottages Lower	22	Mornington Park	30	Winston Ville
7	Winston Ville	15	Maypark	23	Maypark		
8	Artane Cottages Lower	16	28 Malahide Road	24	Mornington Park		

Where applicable, for ease of reference and to avoid excessive repetition, the 30 objections have been grouped by five geographic locations for reporting purposes, see Table 3.1.2 below.

Each geographic location has a sub-section of the report and the objections relating to each geographic location are reported that sub-section, which provides a general description and overview of the key common issues raised by the objections for that geographic area and provides a response to those issues. A response to each of the individual objections is then also provided

Table 3.1.2: Volume of CPO objections per geographic location

Location	No. of CPO objections	CPO Objection Reference Nos	Key Issue Raised
Artane Cottages Lower	9	1, 3, 5, 8, 9, 10, 12,13,14	New bus stop location at Artane Cottages Lower with associated land acquisition from a shared laneway
Maypark	9	6, 15, 18, 23, 25, 26, 27, 28, 29	Land acquisition from property
Mornington Park	5	4, 11, 21, 22, 24	Land acquisition from property
Winston Ville	2	7,30	Land acquisition from property
Dispersed locations	5	2, 16, 17, 19, 20	Land acquisition from property

3.2 Artane Cottages Lower – CPO-01, CPO-03, CPO-05, CPO-08, CPO-09, CPO-10, CPO-12, CPO-13, CPO-14

3.2.1 Description of the Proposed Scheme at this location

As set out in Section 6.3.3.4.1 of Chapter 6 – Traffic and Transport of the EIAR, in general, the current layout at this location, south of the R808 Gracefield Road, is a single carriageway with two lanes in each direction, one standard lane and one bus lane, along with footpaths and advisory cycle lanes, until Donnycarney Road. It is noted that in the vicinity of Artane Cottages, the northbound bus lane is curtailed (between Kilmore Road and number 4 Artane Cottages Lower).

As described in paragraph 4.5.2.1 of EIAR Chapter 4 Proposed Scheme Description, between Gracefield Road Junction and Killester Avenue Junction, it is intended to provide a continuous bus lane with a single general traffic lane in each direction. Dedicated cycle tracks and footpaths will also be provided through this section, including a section of realigned footpath, outbound, between Kilmore Road and St. David's Wood.

The junction at Kilmore Road also includes an additional pedestrian crossing with protection islands for the cycling crossing lanes. A waiting area for cyclists turning right from Malahide Road on to Kilmore Road has been included adjacent to 9 Artane Cottages Lower.

An overview of the design evolution of the junction at this location (Kilmore Road/R107 Malahide Road) is provided in Appendix A6.3 - Junction Design Report of Volume 4 of the EIAR. Images of the junction layout from Concept Design, to Emerging Preferred Route, draft Preferred Route (2nd non-statutory public consultation), updated draft Preferred Route (3rd non-statutory public consultation, including the new bus stops) and final preliminary design are shown here also.

EIAR Volume 3 Chapter 4 Proposed Scheme Description Appendices General Arrangement drawings provide details of the Proposed Scheme at this location, as detailed on Sheet 15 of this drawing set, an extract of which is provided in Figure 3.2.1 below, which shows the following four key features annotated, along with an extract of aerial photography showing the existing road layout.

- 1) Location of CPO (northern access to laneway)
- 2) Grassed access lane to rear of cottages
- 3) Proposed cycle turning facility
- 4) Southern access to laneway

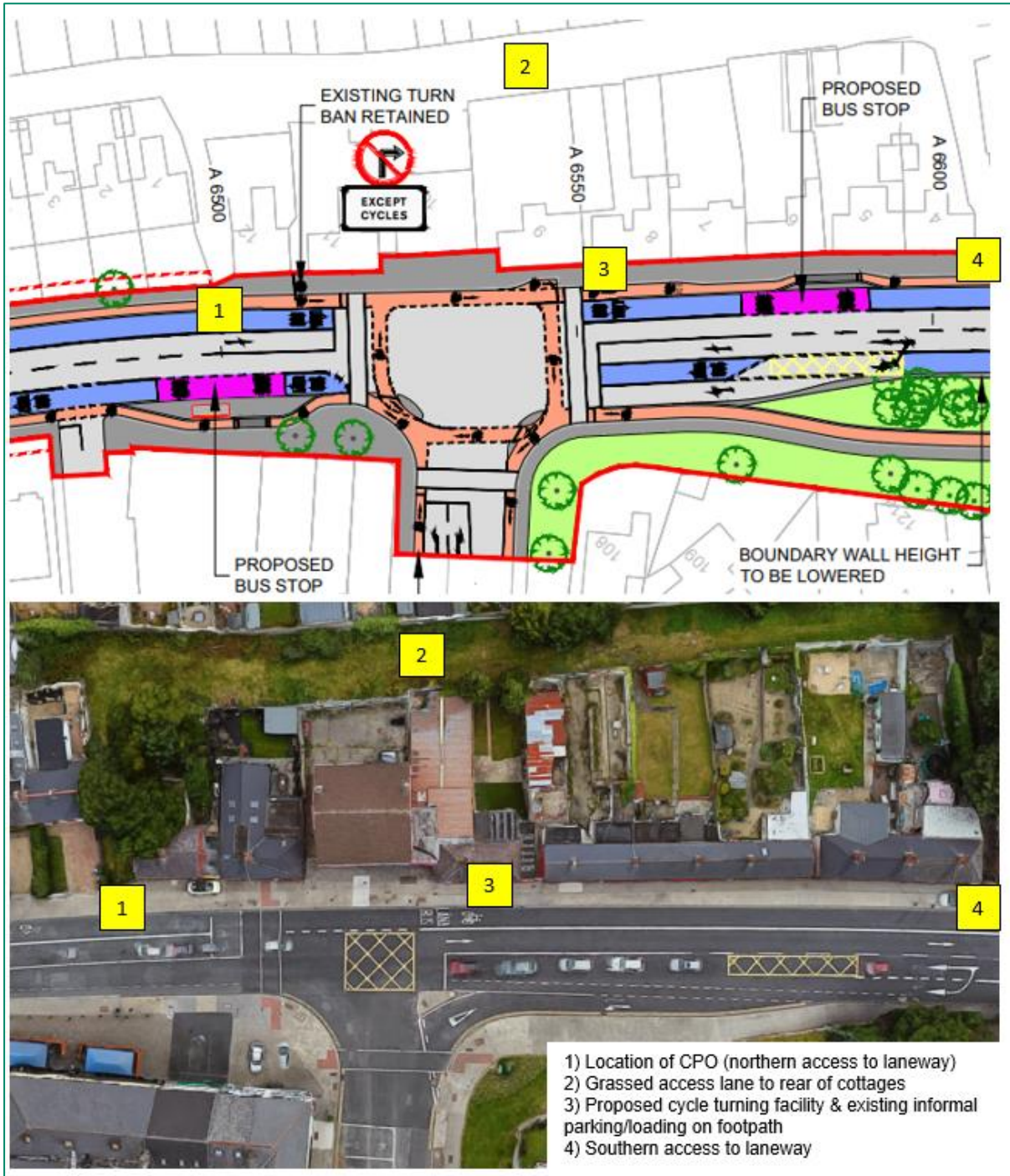


Figure 3.2.1: General Arrangement, Existing Layout and Key Features of Proposed Scheme at Artane Cottages Lower (Image Source: Google)

Further images from Google Street View are provided in Figure 3.2.2, Figure 3.2.3 and Figure 3.2.4.

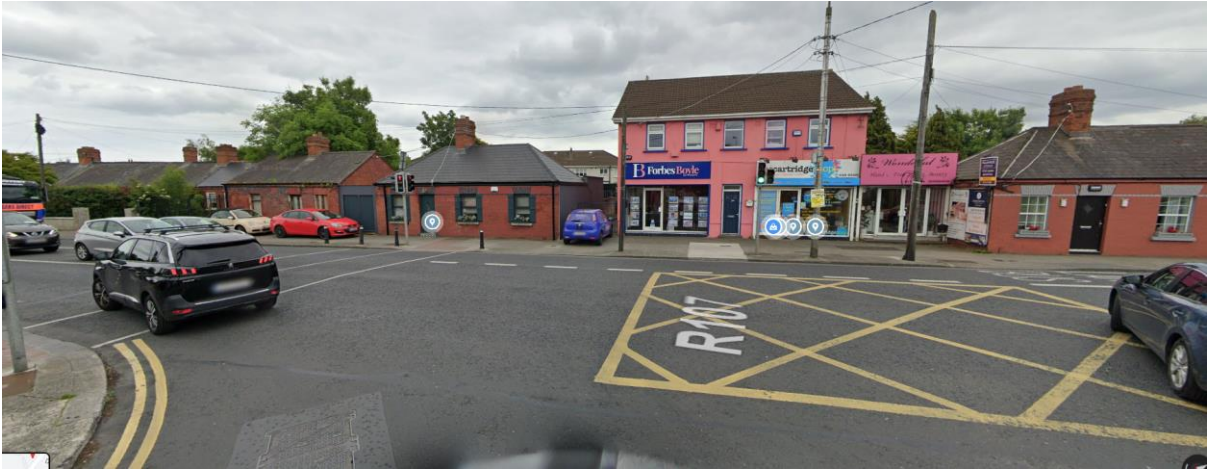


Figure 3.2.2: Existing Layout looking east (Image Source: Google)

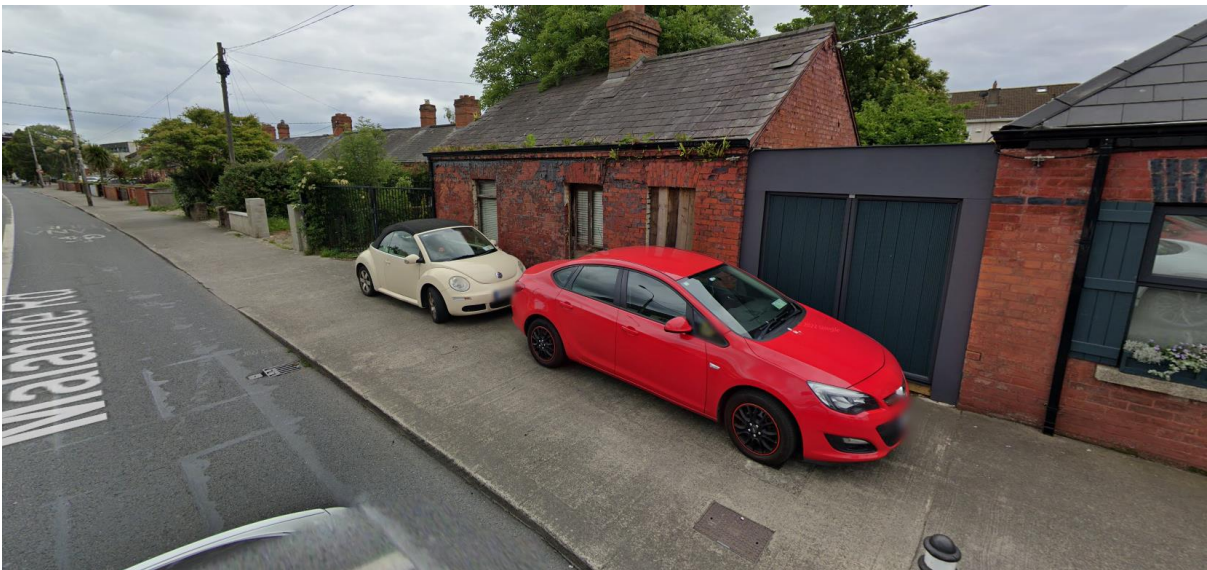


Figure 3.2.3: Existing northern access to laneway looking north (Image Source: Google)



Figure 3.2.4: Existing southern access to laneway looking north-east (Image Source: Google)

As noted above, a grassed laneway exists to the rear of Artane Cottages Lower, accessed via a gated laneway between 1 Artane Cottages Upper and 12 Artane Cottages Lower, see Figure 3.2.5 below.



Figure 3.2.5: Gated entrance to existing northern access to grassed laneway (Image Source: Google)

A small triangular portion of permanent land acquisition (0.1m²) is required at this access laneway, as identified under plot number 1027(1).1a between 12 Artane Cottages Lower and 1 Artane Cottages Upper (chainage A6500).

The extents of the permanent land acquisition at this location is a continuation of the permanent land acquisition line from nos 2 and 1 Artane Cottage Upper immediately north of this location. This permanent land acquisition line is required to accommodate the cross section of the Proposed Scheme at this location.

Specifically, the small land acquisition from the laneway is required to facilitate relocation of the gate post, 0.34m away from the road to accommodate the required footpath width. Plot number 1027(2).2a is an area of temporary land acquisition (2.0m x 0.88m) to allow working space for the relocation of the gate post. The CPO Deposit Map is shown in Figure 3.2.6 below.

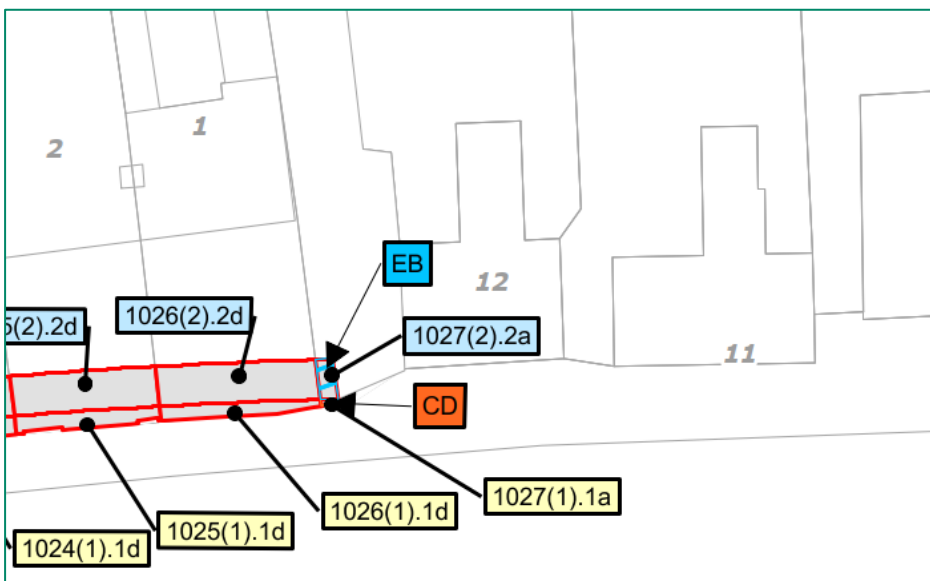


Figure 3.2.6: Extract from CPO Deposit Map

The location of the proposed compulsory acquisition plot is shown in Figure 3.2.7 along with the dimensions.

Figure 3.2.8 shows the Proposed Scheme cross section super-imposed on aerial imagery of the existing road layout.



Figure 3.2.7: Location of Land acquisition plots



Figure 3.2.8: Location of plot & Proposed Scheme Cross Section overlain on existing road layout

3.2.2 Summary of Objections

The 9 objections received in this location appear to be identical to each other and to submission 08 in relation to the Proposed Scheme. The 9 objections originated from 6 households with 2 objections submitted from each of 11 Artane Cottages Lower, 3 Artane Cottages Lower and 8 Artane Cottages Lower.

It is noted that the majority of the issues raised in the CPO objection relate to the Proposed Scheme at locations other than the CPO to which the objectors have an interest. These issues are dealt with in Section 2.3.2 above. It is important to note that the elements of the scheme dealt with in Section 2.3.2 of this report do not require the acquisition of land the subject of this CPO.

All 9 objections state on page 11 that they do not object to the CPO; section 4.1 on page 11 of all 9 objections states:

'4.1 proposed works to the northern gate

Clarification is required on the proposed works to the northern gate accessing the rears of Artane Cottages Lower. While we do not object to the CPO issued in this context, it is unclear in the documents how the NTA undertakes to re-instate the gate – a new gate will be required in a new location (as the purchased area encroaches on the existing location of the gate) at the cost of the NTA and to detail agreed with the residents.'

Subject to confirmation of the CPO by the Board the NTA will enter into negotiations with those parties served with the CPO notice. Accommodation works with regard to the gate / entrance will be at the cost of the NTA.

Notwithstanding the above, in the following section we provide a summary of the clarifications raised by the objections relating the CPO, along with a detailed response. These relate to clarifications of the documentation provided as follows:

3.2.3 Clarifications

The objections have requested a condition with any decision on the overall scheme to require formal engagement with relevant resident groups to finalise details along the route. For Artane Cottages Lower the objections have raised the following 3 points:

- a) Type of gate being proposed at the Northern access where land is being acquired;
- b) Construction detail between the footpath and houses as there are issues with rising damp;
and
- c) Access arrangements for the existing Southern access.

Response to clarifications

The NTA notes also the comments raised in relation to engagement with residents during the implementation phase.

Further information in relation to the approach for communicating with members of the public during the construction phase is set out in Chapter 5 Construction Appendix A5.1 CEMP and summarised below:

The NTA will put in place a Communications Plan in conjunction with the appointed contractor. The Plan will provide a mechanism for members of the public to communicate with the NTA, and for the NTA to communicate important information on various aspects of the Proposed Scheme to the public. The Plan will include procedures to inform members of the community directly affected by the Construction Phase on schedules for any activity of a particularly disruptive nature which is likely to impinge on their property such as boundary works, road closures and diversions, and any mitigating actions that are being taken to minimise such disruption.

In response to the three specific points made the NTA make respond as follows:

- a) Type of gate being proposed at the Northern access where land is being acquired

The NTA acknowledge that no formal objection to the CPO has been made in the context of the proposed works associated with the permanent land acquisition (0.1m²) required at the grassed laneway as identified under plot number 1027(2).2a adjacent to 1 Artane Cottages Upper. As described in section 3.2.1 above, the following clarification is provided in relation to the proposed works at this location, namely the work is to facilitate relocation of the gate post and re-erection of the existing gates to accommodate the Proposed Scheme cross section.

- b) Construction detail between the footpath and houses as there are issues with rising damp

The NTA notes the comments raised in relation to footpath/building interface details and legacy issues associated with the current footpath construction. Given the existing footpath widths are largely maintained at this location, the proposed works will not adversely impact the legacy issues and challenges associated with drainage, rising damp and sound transfer for these buildings, notwithstanding pre-construction and post construction surveys will be undertaken in line with Section 5.5.2.1 of EIAR Chapter 5 Construction.

c) Access arrangements for the existing Southern Access

The NTA notes the request for clarification in relation to proposed access to residential parking and acknowledge that the vehicular access to the rear lane is primarily via the southern gate between nos. 3 and 4 Artane Cottages Lower.

The intention under the Proposed Scheme will be to retain the existing access to the driveway at this location and thus not adversely impact these existing arrangements. Specific detail/landowner requirements associated with accommodation works will be discussed with individual landowners.

3.2.4 Responses to Individual Objections

CPO-01 Aine Kelly

Overview of Objection

Section 4.1 on page 11 of the objection it states that they do not object to the CPO;

'4.1 proposed works to the northern gate

Clarification is required on the proposed works to the northern gate accessing the rears of Artane Cottages Lower. While we do not object to the CPO issued in this context, it is unclear in the documents how the NTA undertakes to re-instate the gate – a new gate will be required in a new location (as the purchased area encroaches on the existing location of the gate) at the cost of the NTA and to detail agreed with the residents.'

Notwithstanding the above, in the following section we provide a summary of the clarifications raised by the objection relating to the CPO, along with a detailed response. These relate to clarifications of the documentation provided as follows:

Clarifications

The objections have requested a condition with any decision on the overall scheme to require formal engagement with relevant resident groups to finalise details along the route. For Artane Cottages Lower the objections have raised the following 3 points:

- a) Type of gate being proposed at the Northern access where land is being acquired;
- b) Construction detail between the footpath and houses as there are issues with rising damp; and
- c) Access arrangements for the existing Southern access.

Response to clarifications

The NTA notes also the comments raised in relation to engagement with residents during the implementation phase.

Further information in relation to the approach for communicating with members of the public during the construction phase is set out in Chapter 5 Construction Appendix A5.1 CEMP and summarised below:

The NTA will put in place a Communications Plan in conjunction with the appointed contractor. The Plan will provide a mechanism for members of the public to communicate with the NTA, and for the NTA to communicate important information on various aspects of the Proposed Scheme to the public. The Plan will include procedures to inform members of the community directly affected by the Construction Phase on schedules for any activity of a particularly disruptive nature which is likely to impinge on their property such as boundary works, road closures and diversions, and any mitigating actions that are being taken to minimise such disruption.

In response to the three specific points made the NTA make respond as follows:

- a) Type of gate being proposed at the Northern access where land is being acquired

The NTA acknowledge that no formal objection to the CPO has been made in the context of the proposed works associated with the permanent land acquisition (0.1m²) required at the grassed laneway as identified under plot number 1027(2).2a adjacent to 1 Artane Cottages Upper. As described in section 3.2.1 above, the following clarification is provided in relation to the proposed works at this location, namely the work is to facilitate relocation of the gate post and re-erection of the existing gates to accommodate the Proposed Scheme cross section.

- b) Construction detail between the footpath and houses as there are issues with rising damp

The NTA notes the comments raised in relation to footpath/building interface details and legacy issues associated with the current footpath construction. Given the existing footpath widths are largely maintained at this location, the proposed works will not adversely impact the legacy issues and challenges associated with drainage, rising damp and sound transfer for these buildings, notwithstanding pre-construction and post construction surveys will be undertaken in line with Section 5.5.2.1 of EIAR Chapter 5 Construction.

c) Access arrangements for the existing Southern Access

The NTA notes the request for clarification in relation to proposed access to residential parking and acknowledge that the vehicular access to the rear lane is primarily via the southern gate between nos. 3 and 4 Artane Cottages Lower.

The intention under the Proposed Scheme will be to retain the existing access to the driveway at this location and thus not adversely impact these existing arrangements. Specific detail/landowner requirements associated with accommodation works will be discussed with individual landowners.

CPO-03 Anna Hofheinz

Overview of Objection

Section 4.1 on page 11 of the objection it states that they do not object to the CPO;

'4.1 proposed works to the northern gate

Clarification is required on the proposed works to the northern gate accessing the rears of Artane Cottages Lower. While we do not object to the CPO issued in this context, it is unclear in the documents how the NTA undertakes to re-instate the gate – a new gate will be required in a new location (as the purchased area encroaches on the existing location of the gate) at the cost of the NTA and to detail agreed with the residents.'

Notwithstanding the above, in the following section we provide a summary of the clarifications raised by the objection relating the CPO, along with a detailed response. These relate to clarifications of the documentation provided as follows:

Clarifications

The objections have requested a condition with any decision on the overall scheme to require formal engagement with relevant resident groups to finalise details along the route. For Artane Cottages Lower the objections have raised the following 3 points:

- a) Type of gate being proposed at the Northern access where land is being acquired;
- b) Construction detail between the footpath and houses as there are issues with rising damp; and
- c) Access arrangements for the existing Southern access.

Response to clarifications

The NTA notes also the comments raised in relation to engagement with residents during the implementation phase.

Further information in relation to the approach for communicating with members of the public during the construction phase is set out in Chapter 5 Construction Appendix A5.1 CEMP and summarised below:

The NTA will put in place a Communications Plan in conjunction with the appointed contractor. The Plan will provide a mechanism for members of the public to communicate with the NTA, and for the NTA to communicate important information on various aspects of the Proposed Scheme to the public. The Plan will include procedures to inform members of the community directly affected by the Construction Phase on schedules for any activity of a particularly disruptive nature which is likely to impinge on their property such as boundary works, road closures and diversions, and any mitigating actions that are being taken to minimise such disruption.

In response to the three specific points made the NTA make respond as follows:

- a) Type of gate being proposed at the Northern access where land is being acquired

The NTA acknowledge that no formal objection to the CPO has been made in the context of the proposed works associated with the permanent land acquisition (0.1m²) required at the grassed laneway as identified under plot number 1027(2).2a adjacent to 1 Artane Cottages Upper. As described in section 3.2.1 above, the following clarification is provided in relation to the proposed works at this location, namely the work is to facilitate relocation of the gate post and re-erection of the existing gates to accommodate the Proposed Scheme cross section.

- b) Construction detail between the footpath and property as there are issues with rising damp

The NTA notes the comments raised in relation to footpath/building interface details and legacy issues associated with the current footpath construction. Given the existing footpath widths are largely maintained at this location, the proposed works will not adversely impact the legacy issues and

challenges associated with drainage, rising damp and sound transfer for these buildings, notwithstanding pre-construction and post construction surveys will be undertaken in line with Section 5.5.2.1 of EIAR Chapter 5 Construction.

a) Access arrangements for the existing Southern Access

The NTA notes the request for clarification in relation to proposed access to residential parking and acknowledge that the vehicular access to the rear lane is primarily via the southern gate between nos. 3 and 4 Artane Cottages Lower.

The intention under the Proposed Scheme will be to retain the existing access to the driveway at this location and thus not adversely impact these existing arrangements. Specific detail/landowner requirements associated with accommodation works will be discussed with individual landowners.

CPO-05 Derek Mahony

Overview of Objection

Section 4.1 on page 11 of the objection it states that they do not object to the CPO;

'4.1 proposed works to the northern gate

Clarification is required on the proposed works to the northern gate accessing the rears of Artane Cottages Lower. While we do not object to the CPO issued in this context, it is unclear in the documents how the NTA undertakes to re-instate the gate – a new gate will be required in a new location (as the purchased area encroaches on the existing location of the gate) at the cost of the NTA and to detail agreed with the residents.'

Notwithstanding the above, in the following section we provide a summary of the clarifications raised by the objection relating the CPO, along with a detailed response. These relate to clarifications of the documentation provided as follows:

Clarifications

The objections have requested a condition with any decision on the overall scheme to require formal engagement with relevant resident groups to finalise details along the route. For Artane Cottages Lower the objections have raised the following 3 points:

- a) Type of gate being proposed at the Northern access where land is being acquired;
- b) Construction detail between the footpath and houses as there are issues with rising damp; and
- c) Access arrangements for the existing Southern access.

Response to clarifications

The NTA notes also the comments raised in relation to engagement with residents during the implementation phase.

Further information in relation to the approach for communicating with members of the public during the construction phase is set out in Chapter 5 Construction Appendix A5.1 CEMP and summarised below:

The NTA will put in place a Communications Plan in conjunction with the appointed contractor. The Plan will provide a mechanism for members of the public to communicate with the NTA, and for the NTA to communicate important information on various aspects of the Proposed Scheme to the public. The Plan will include procedures to inform members of the community directly affected by the Construction Phase on schedules for any activity of a particularly disruptive nature which is likely to impinge on their property such as boundary works, road closures and diversions, and any mitigating actions that are being taken to minimise such disruption.

In response to the three specific points made the NTA make respond as follows:

- a) Type of gate being proposed at the Northern access where land is being acquired

The NTA acknowledge that no formal objection to the CPO has been made in the context of the proposed works associated with the permanent land acquisition (0.1m²) required at the grassed laneway as identified under plot number 1027(2).2a adjacent to 1 Artane Cottages Upper. As described in section 3.2.1 above, the following clarification is provided in relation to the proposed works at this location, namely the work is to facilitate relocation of the gate post and re-erection of the existing gates to accommodate the Proposed Scheme cross section.

- b) Construction detail between the footpath and houses as there are issues with rising damp

The NTA notes the comments raised in relation to footpath/building interface details and legacy issues associated with the current footpath construction. Given the existing footpath widths are largely maintained at this location, the proposed works will not adversely impact the legacy issues and

challenges associated with drainage, rising damp and sound transfer for these buildings, notwithstanding pre-construction and post construction surveys will be undertaken in line with Section 5.5.2.1 of EIAR Chapter 5 Construction.

a) Access arrangements for the existing Southern Access

The NTA notes the request for clarification in relation to proposed access to residential parking and acknowledge that the vehicular access to the rear lane is primarily via the southern gate between nos. 3 and 4 Artane Cottages Lower.

The intention under the Proposed Scheme will be to retain the existing access to the driveway at this location and thus not adversely impact these existing arrangements. Specific detail/landowner requirements associated with accommodation works will be discussed with individual landowners.

CPO-08 Gerard Whelehan

Overview of Objection

Section 4.1 on page 11 of the objection it states that they do not object to the CPO;

'4.1 proposed works to the northern gate

Clarification is required on the proposed works to the northern gate accessing the rears of Artane Cottages Lower. While we do not object to the CPO issued in this context, it is unclear in the documents how the NTA undertakes to re-instate the gate – a new gate will be required in a new location (as the purchased area encroaches on the existing location of the gate) at the cost of the NTA and to detail agreed with the residents.'

Notwithstanding the above, in the following section we provide a summary of the clarifications raised by the objection relating to the CPO, along with a detailed response. These relate to clarifications of the documentation provided as follows:

Clarifications

The objections have requested a condition with any decision on the overall scheme to require formal engagement with relevant resident groups to finalise details along the route. For Artane Cottages Lower the objections have raised the following 3 points:

- a) Type of gate being proposed at the Northern access where land is being acquired;
- b) Construction detail between the footpath and houses as there are issues with rising damp; and
- c) Access arrangements for the existing Southern access.

Response to clarifications

The NTA notes also the comments raised in relation to engagement with residents during the implementation phase.

Further information in relation to the approach for communicating with members of the public during the construction phase is set out in Chapter 5 Construction Appendix A5.1 CEMP and summarised below:

The NTA will put in place a Communications Plan in conjunction with the appointed contractor. The Plan will provide a mechanism for members of the public to communicate with the NTA, and for the NTA to communicate important information on various aspects of the Proposed Scheme to the public. The Plan will include procedures to inform members of the community directly affected by the Construction Phase on schedules for any activity of a particularly disruptive nature which is likely to impinge on their property such as boundary works, road closures and diversions, and any mitigating actions that are being taken to minimise such disruption.

In response to the three specific points made the NTA make respond as follows:

- a) Type of gate being proposed at the Northern access where land is being acquired

The NTA acknowledge that no formal objection to the CPO has been made in the context of the proposed works associated with the permanent land acquisition (0.1m²) required at the grassed laneway as identified under plot number 1027(2).2a adjacent to 1 Artane Cottages Upper. As described in section 3.2.1 above, the following clarification is provided in relation to the proposed works at this location, namely the work is to facilitate relocation of the gate post and re-erection of the existing gates to accommodate the Proposed Scheme cross section.

- b) Construction detail between the footpath and houses as there are issues with rising damp

The NTA notes the comments raised in relation to footpath/building interface details and legacy issues associated with the current footpath construction. Given the existing footpath widths are largely maintained at this location, the proposed works will not adversely impact the legacy issues and

challenges associated with drainage, rising damp and sound transfer for these buildings, notwithstanding pre-construction and post construction surveys will be undertaken in line with Section 5.5.2.1 of EIAR Chapter 5 Construction.

a) Access arrangements for the existing Southern Access

The NTA notes the request for clarification in relation to proposed access to residential parking and acknowledge that the vehicular access to the rear lane is primarily via the southern gate between nos. 3 and 4 Artane Cottages Lower.

The intention under the Proposed Scheme will be to retain the existing access to the driveway at this location and thus not adversely impact these existing arrangements. Specific detail/landowner requirements associated with accommodation works will be discussed with individual landowners.

CPO-09 Laura Meaney

Overview of Objection

Section 4.1 on page 11 of the objection it states that they do not object to the CPO;

'4.1 proposed works to the northern gate

Clarification is required on the proposed works to the northern gate accessing the rears of Artane Cottages Lower. While we do not object to the CPO issued in this context, it is unclear in the documents how the NTA undertakes to re-instate the gate – a new gate will be required in a new location (as the purchased area encroaches on the existing location of the gate) at the cost of the NTA and to detail agreed with the residents.'

Notwithstanding the above, in the following section we provide a summary of the clarifications raised by the objection relating to the CPO, along with a detailed response. These relate to clarifications of the documentation provided as follows:

Clarifications

The objections have requested a condition with any decision on the overall scheme to require formal engagement with relevant resident groups to finalise details along the route. For Artane Cottages Lower the objections have raised the following 3 points:

- a) Type of gate being proposed at the Northern access where land is being acquired;
- b) Construction detail between the footpath and houses as there are issues with rising damp; and
- c) Access arrangements for the existing Southern access.

Response to clarifications

The NTA notes also the comments raised in relation to engagement with residents during the implementation phase.

Further information in relation to the approach for communicating with members of the public during the construction phase is set out in Chapter 5 Construction Appendix A5.1 CEMP and summarised below:

The NTA will put in place a Communications Plan in conjunction with the appointed contractor. The Plan will provide a mechanism for members of the public to communicate with the NTA, and for the NTA to communicate important information on various aspects of the Proposed Scheme to the public. The Plan will include procedures to inform members of the community directly affected by the Construction Phase on schedules for any activity of a particularly disruptive nature which is likely to impinge on their property such as boundary works, road closures and diversions, and any mitigating actions that are being taken to minimise such disruption.

In response to the three specific points made the NTA make respond as follows:

- a) Type of gate being proposed at the Northern access where land is being acquired

The NTA acknowledge that no formal objection to the CPO has been made in the context of the proposed works associated with the permanent land acquisition (0.1m²) required at the grassed laneway as identified under plot number 1027(2).2a adjacent to 1 Artane Cottages Upper. As described in section 3.2.1 above, the following clarification is provided in relation to the proposed works at this location, namely the work is to facilitate relocation of the gate post and re-erection of the existing gates to accommodate the Proposed Scheme cross section.

- b) Construction detail between the footpath and houses as there are issues with rising damp

The NTA notes the comments raised in relation to footpath/building interface details and legacy issues associated with the current footpath construction. Given the existing footpath widths are largely maintained at this location, the proposed works will not adversely impact the legacy issues and

challenges associated with drainage, rising damp and sound transfer for these buildings, notwithstanding pre-construction and post construction surveys will be undertaken in line with Section 5.5.2.1 of EIAR Chapter 5 Construction.

a) Access arrangements for the existing Southern Access

The NTA notes the request for clarification in relation to proposed access to residential parking and acknowledge that the vehicular access to the rear lane is primarily via the southern gate between nos. 3 and 4 Artane Cottages Lower.

The intention under the Proposed Scheme will be to retain the existing access to the driveway at this location and thus not adversely impact these existing arrangements. Specific detail/landowner requirements associated with accommodation works will be discussed with individual landowners.

CPO-10 Margaret Radford

Overview of Objection

Section 4.1 on page 11 of the objection it states that they do not object to the CPO;

'4.1 proposed works to the northern gate

Clarification is required on the proposed works to the northern gate accessing the rears of Artane Cottages Lower. While we do not object to the CPO issued in this context, it is unclear in the documents how the NTA undertakes to re-instate the gate – a new gate will be required in a new location (as the purchased area encroaches on the existing location of the gate) at the cost of the NTA and to detail agreed with the residents.'

Notwithstanding the above, in the following section we provide a summary of the clarifications raised by the objection relating to the CPO, along with a detailed response. These relate to clarifications of the documentation provided as follows:

Clarifications

The objections have requested a condition with any decision on the overall scheme to require formal engagement with relevant resident groups to finalise details along the route. For Artane Cottages Lower the objections have raised the following 3 points:

- a) Type of gate being proposed at the Northern access where land is being acquired;
- b) Construction detail between the footpath and houses as there are issues with rising damp;
and
- c) Access arrangements for the existing Southern access.

Response to clarifications

The NTA notes also the comments raised in relation to engagement with residents during the implementation phase.

Further information in relation to the approach for communicating with members of the public during the construction phase is set out in Chapter 5 Construction Appendix A5.1 CEMP and summarised below:

The NTA will put in place a Communications Plan in conjunction with the appointed contractor. The Plan will provide a mechanism for members of the public to communicate with the NTA, and for the NTA to communicate important information on various aspects of the Proposed Scheme to the public. The Plan will include procedures to inform members of the community directly affected by the Construction Phase on schedules for any activity of a particularly disruptive nature which is likely to impinge on their property such as boundary works, road closures and diversions, and any mitigating actions that are being taken to minimise such disruption.

In response to the three specific points made the NTA make respond as follows:

- a) Type of gate being proposed at the Northern access where land is being acquired

The NTA acknowledge that no formal objection to the CPO has been made in the context of the proposed works associated with the permanent land acquisition (0.1m²) required at the grassed laneway as identified under plot number 1027(2).2a adjacent to 1 Artane Cottages Upper. As described in section 3.2.1 above, the following clarification is provided in relation to the proposed works at this location, namely the work is to facilitate relocation of the gate post and re-erection of the existing gates to accommodate the Proposed Scheme cross section.

- b) Construction detail between the footpath and houses as there are issues with rising damp

The NTA notes the comments raised in relation to footpath/building interface details and legacy issues associated with the current footpath construction. Given the existing footpath widths are largely maintained at this location, the proposed works will not adversely impact the legacy issues and

challenges associated with drainage, rising damp and sound transfer for these buildings, notwithstanding pre-construction and post construction surveys will be undertaken in line with Section 5.5.2.1 of EIAR Chapter 5 Construction.

a) Access arrangements for the existing Southern Access

The NTA notes the request for clarification in relation to proposed access to residential parking and acknowledge that the vehicular access to the rear lane is primarily via the southern gate between nos. 3 and 4 Artane Cottages Lower.

The intention under the Proposed Scheme will be to retain the existing access to the driveway at this location and thus not adversely impact these existing arrangements. Specific detail/landowner requirements associated with accommodation works will be discussed with individual landowners.

CPO-12 Paul Cotter

Overview of Objection

Section 4.1 on page 11 of the objection it states that they do not object to the CPO;

'4.1 proposed works to the northern gate

Clarification is required on the proposed works to the northern gate accessing the rears of Artane Cottages Lower. While we do not object to the CPO issued in this context, it is unclear in the documents how the NTA undertakes to re-instate the gate – a new gate will be required in a new location (as the purchased area encroaches on the existing location of the gate) at the cost of the NTA and to detail agreed with the residents.'

Notwithstanding the above, in the following section we provide a summary of the clarifications raised by the objection relating the CPO, along with a detailed response. These relate to clarifications of the documentation provided as follows:

Clarifications

The objections have requested a condition with any decision on the overall scheme to require formal engagement with relevant resident groups to finalise details along the route. For Artane Cottages Lower the objections have raised the following 3 points:

- a) Type of gate being proposed at the Northern access where land is being acquired;
- b) Construction detail between the footpath and houses as there are issues with rising damp; and
- c) Access arrangements for the existing Southern access.

Response to clarifications

The NTA notes also the comments raised in relation to engagement with residents during the implementation phase.

Further information in relation to the approach for communicating with members of the public during the construction phase is set out in Chapter 5 Construction Appendix A5.1 CEMP and summarised below:

The NTA will put in place a Communications Plan in conjunction with the appointed contractor. The Plan will provide a mechanism for members of the public to communicate with the NTA, and for the NTA to communicate important information on various aspects of the Proposed Scheme to the public. The Plan will include procedures to inform members of the community directly affected by the Construction Phase on schedules for any activity of a particularly disruptive nature which is likely to impinge on their property such as boundary works, road closures and diversions, and any mitigating actions that are being taken to minimise such disruption.

In response to the three specific points made the NTA make respond as follows:

- a) Type of gate being proposed at the Northern access where land is being acquired

The NTA acknowledge that no formal objection to the CPO has been made in the context of the proposed works associated with the permanent land acquisition (0.1m²) required at the grassed laneway as identified under plot number 1027(2).2a adjacent to 1 Artane Cottages Upper. As described in section 3.2.1 above, the following clarification is provided in relation to the proposed works at this location, namely the work is to facilitate relocation of the gate post and re-erection of the existing gates to accommodate the Proposed Scheme cross section.

- b) Construction detail between the footpath and houses as there are issues with rising damp

The NTA notes the comments raised in relation to footpath/building interface details and legacy issues associated with the current footpath construction. Given the existing footpath widths are largely maintained at this location, the proposed works will not adversely impact the legacy issues and

challenges associated with drainage, rising damp and sound transfer for these buildings, notwithstanding pre-construction and post construction surveys will be undertaken in line with Section 5.5.2.1 of EIAR Chapter 5 Construction.

c) Access arrangements for the existing Southern Access

The NTA notes the request for clarification in relation to proposed access to residential parking and acknowledge that the vehicular access to the rear lane is primarily via the southern gate between nos. 3 and 4 Artane Cottages Lower.

The intention under the Proposed Scheme will be to retain the existing access to the driveway at this location and thus not adversely impact these existing arrangements. Specific detail/landowner requirements associated with accommodation works will be discussed with individual landowners.

CPO-13 Pawel Jaskowski

Overview of Objection

Section 4.1 on page 11 of the objection it states that they do not object to the CPO;

'4.1 proposed works to the northern gate

Clarification is required on the proposed works to the northern gate accessing the rears of Artane Cottages Lower. While we do not object to the CPO issued in this context, it is unclear in the documents how the NTA undertakes to re-instate the gate – a new gate will be required in a new location (as the purchased area encroaches on the existing location of the gate) at the cost of the NTA and to detail agreed with the residents.'

Notwithstanding the above, in the following section we provide a summary of the clarifications raised by the objection relating the CPO, along with a detailed response. These relate to clarifications of the documentation provided as follows:

Clarifications

The objections have requested a condition with any decision on the overall scheme to require formal engagement with relevant resident groups to finalise details along the route. For Artane Cottages Lower the objections have raised the following 3 points:

- a) Type of gate being proposed at the Northern access where land is being acquired;
- b) Construction detail between the footpath and houses as there are issues with rising damp; and
- c) Access arrangements for the existing Southern access.

Response to clarifications

The NTA notes also the comments raised in relation to engagement with residents during the implementation phase.

Further information in relation to the approach for communicating with members of the public during the construction phase is set out in Chapter 5 Construction Appendix A5.1 CEMP and summarised below:

The NTA will put in place a Communications Plan in conjunction with the appointed contractor. The Plan will provide a mechanism for members of the public to communicate with the NTA, and for the NTA to communicate important information on various aspects of the Proposed Scheme to the public. The Plan will include procedures to inform members of the community directly affected by the Construction Phase on schedules for any activity of a particularly disruptive nature which is likely to impinge on their property such as boundary works, road closures and diversions, and any mitigating actions that are being taken to minimise such disruption.

In response to the three specific points made the NTA make respond as follows:

- a) Type of gate being proposed at the Northern access where land is being acquired

The NTA acknowledge that no formal objection to the CPO has been made in the context of the proposed works associated with the permanent land acquisition (0.1m²) required at the grassed laneway as identified under plot number 1027(2).2a adjacent to 1 Artane Cottages Upper. As described in section 3.2.1 above, the following clarification is provided in relation to the proposed works at this location, namely the work is to facilitate relocation of the gate post and re-erection of the existing gates to accommodate the Proposed Scheme cross section.

- b) Construction detail between the footpath and houses as there are issues with rising damp

The NTA notes the comments raised in relation to footpath/building interface details and legacy issues associated with the current footpath construction. Given the existing footpath widths are largely maintained at this location, the proposed works will not adversely impact the legacy issues and

challenges associated with drainage, rising damp and sound transfer for these buildings, notwithstanding pre-construction and post construction surveys will be undertaken in line with Section 5.5.2.1 of EIAR Chapter 5 Construction.

c) Access arrangements for the existing Southern Access

The NTA notes the request for clarification in relation to proposed access to residential parking and acknowledge that the vehicular access to the rear lane is primarily via the southern gate between nos. 3 and 4 Artane Cottages Lower.

The intention under the Proposed Scheme will be to retain the existing access to the driveway at this location and thus not adversely impact these existing arrangements. Specific detail/landowner requirements associated with accommodation works will be discussed with individual landowners.

CPO-14 Sophie Mahony

Overview of Objection

Section 4.1 on page 11 of the objection it states that they do not object to the CPO;

'4.1 proposed works to the northern gate

Clarification is required on the proposed works to the northern gate accessing the rears of Artane Cottages Lower. While we do not object to the CPO issued in this context, it is unclear in the documents how the NTA undertakes to re-instate the gate – a new gate will be required in a new location (as the purchased area encroaches on the existing location of the gate) at the cost of the NTA and to detail agreed with the residents.'

Notwithstanding the above, in the following section we provide a summary of the clarifications raised by the objection relating to the CPO, along with a detailed response. These relate to clarifications of the documentation provided as follows:

Clarifications

The objections have requested a condition with any decision on the overall scheme to require formal engagement with relevant resident groups to finalise details along the route. For Artane Cottages Lower the objections have raised the following 3 points:

- a) Type of gate being proposed at the Northern access where land is being acquired;
- b) Construction detail between the footpath and houses as there are issues with rising damp; and
- c) Access arrangements for the existing Southern access.

Response to clarifications

The NTA notes also the comments raised in relation to engagement with residents during the implementation phase.

Further information in relation to the approach for communicating with members of the public during the construction phase is set out in Chapter 5 Construction Appendix A5.1 CEMP and summarised below:

The NTA will put in place a Communications Plan in conjunction with the appointed contractor. The Plan will provide a mechanism for members of the public to communicate with the NTA, and for the NTA to communicate important information on various aspects of the Proposed Scheme to the public. The Plan will include procedures to inform members of the community directly affected by the Construction Phase on schedules for any activity of a particularly disruptive nature which is likely to impinge on their property such as boundary works, road closures and diversions, and any mitigating actions that are being taken to minimise such disruption.

In response to the three specific points made the NTA make respond as follows:

- a) Type of gate being proposed at the Northern access where land is being acquired

The NTA acknowledge that no formal objection to the CPO has been made in the context of the proposed works associated with the permanent land acquisition (0.1m²) required at the grassed laneway as identified under plot number 1027(2).2a adjacent to 1 Artane Cottages Upper. As described in section 3.2.1 above, the following clarification is provided in relation to the proposed works at this location, namely the work is to facilitate relocation of the gate post and re-erection of the existing gates to accommodate the Proposed Scheme cross section.

- b) Construction detail between the footpath and houses as there are issues with rising damp

The NTA notes the comments raised in relation to footpath/building interface details and legacy issues associated with the current footpath construction. Given the existing footpath widths are largely maintained at this location, the proposed works will not adversely impact the legacy issues and

challenges associated with drainage, rising damp and sound transfer for these buildings, notwithstanding pre-construction and post construction surveys will be undertaken in line with Section 5.5.2.1 of EIAR Chapter 5 Construction.

c) Access arrangements for the existing Southern Access

The NTA notes the request for clarification in relation to proposed access to residential parking and acknowledge that the vehicular access to the rear lane is primarily via the southern gate between nos. 3 and 4 Artane Cottages Lower.

The intention under the Proposed Scheme will be to retain the existing access to the driveway at this location and thus not adversely impact these existing arrangements. Specific detail/landowner requirements associated with accommodation works will be discussed with individual landowners.

3.3 Maypark – CPO-06, CPO-15, CPO-18, CPO-23, CPO-25, CPO-26, CPO-27, CPO-28 and CPO-29

3.3.1 Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor, as described in paragraph 4.5.2.1 of Chapter 4 of Volume 2 of the EIAR, between Killester Avenue Junction and Collins Avenue Junction, a continuous bus lane with a single general traffic lane will be provided in each direction. Dedicated cycle tracks and footpath facilities will be provided through this section. The existing road between these junctions requires widening to accommodate the desired lane widths and cycle facilities. The existing footpath within Maypark (park) will be realigned to allow for the provision of the road works. Between Maypark (park) and Collins Avenue land take is required from private properties on inbound side of Malahide Road.

The relevant extract from EIAR Chapter 4 Proposed Scheme Description Appendix the General Arrangement drawings is shown Figure 3.3.1 and Figure 3.3.2 below. The existing aerial layout are shown in Figure 3.3.3 and Figure 3.3.4 below.

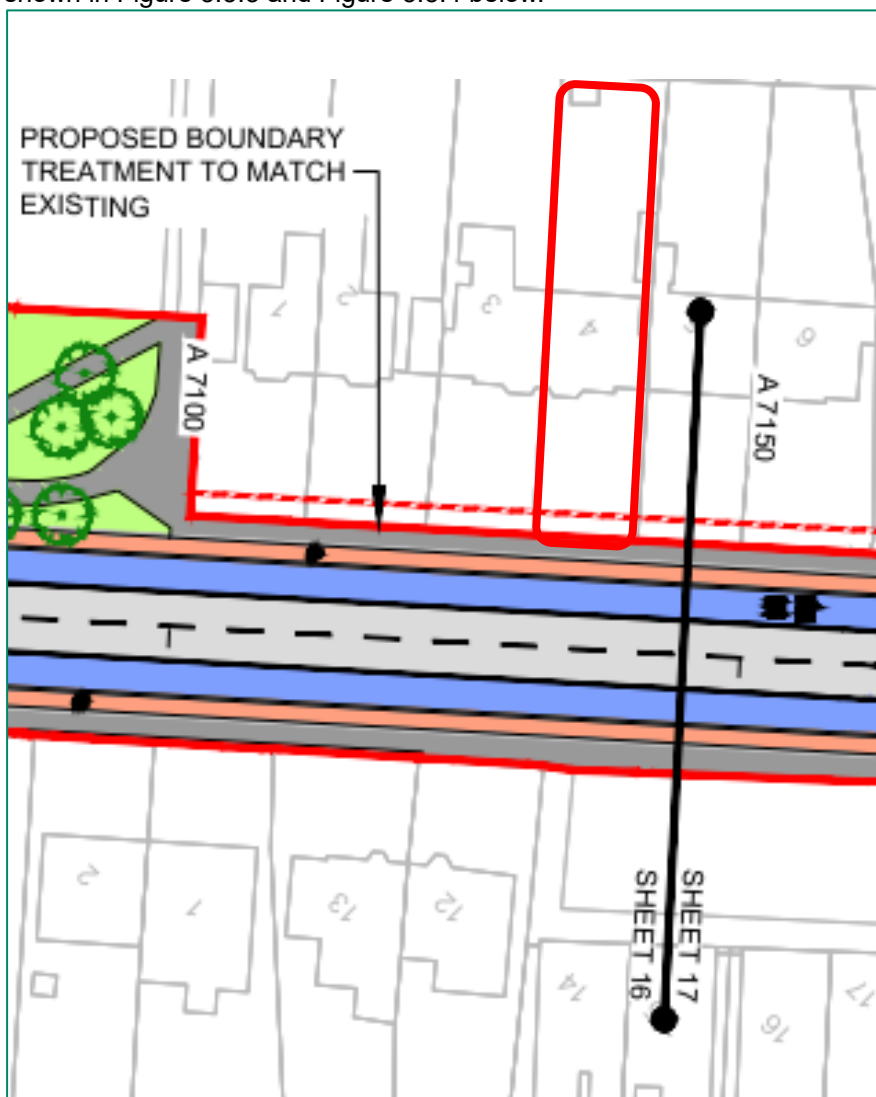


Figure 3.3.1: Proposed new Layout at 4 Maypark, Malahide Road

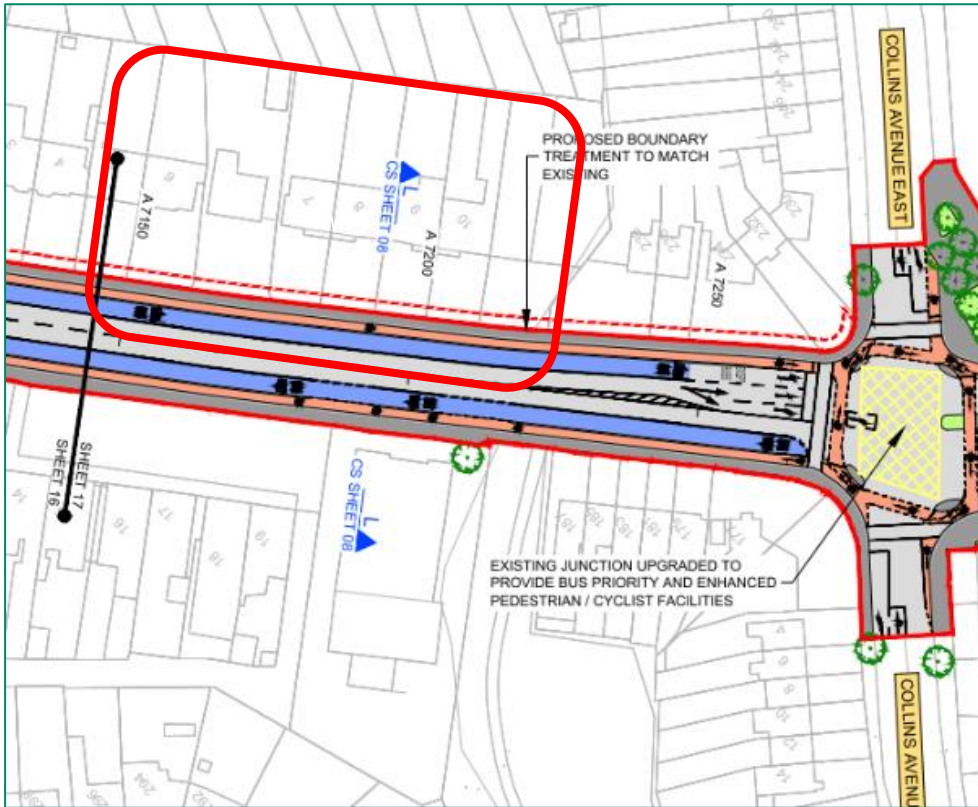


Figure 3.3.2: Proposed new Layout at 5, 6, 6A,7,8, 9 10 Maypark, Malahide Road



Figure 3.3.3: Existing aerial view of 4 Maypark, Malahide Road



Figure 3.3.4 :Existing aerial view of 5,6, 6A,7,8, 9 10 Maypark, Malahide Road

3.3.2 Summary of Objections Raised

Objections CPO-18, CPO-23, CPO-25, CPO-26, CPO-27, CPO-28 and CPO-29 all raise the same five issues which are described in Section 3.3.3 below. Objections CPO-06 and CPO-15 raise more specific issues and are responded to in Section 3.3.4 below.

3.3.3 Common Objections CPO-18, CPO-23, CPO-25, CPO-26, CPO-27, CPO-28 and CPO-29

Common Issues Raised

There are five common issues raised by objections CPO-18, CPO-23, CPO-25, CPO-26, CPO-27, CPO-28 and CPO-29.

i. Access during operation

The objections raised concerns about access in and out of their driveways, particularly the need to reverse into the driveway across a new cycle track.

ii. Noise and access during construction

The objections raised concerns about construction noise and the ability to access to their properties during construction

iii. Loss of Parking

The objections raised issues with the loss of space for parking within the property being reduced/removed due to the proposed cycle track /footpath

iv. Noise Impacts

The objections raised concerns about noise pollution as a result of road traffic being closer to the residence.

v. Landscape Impacts

The objections were concerned with the loss of landscape features within their property.

Responses to Common Issues Raised

i. Access during operation

Presently accessing / egressing the properties requires crossing the bus lane and the footpath; with the Proposed Scheme it will also involve crossing the new cycle track. The existing width of the footpath is approximately 2.3m wide. The width of the proposed footpath is 2.0m and the cycle track is 1.75m in front of the properties, with the increase in width crossed 1.45m.

The principle of how residents can access/ egress their properties is unchanged by the scheme proposals. The objections note that under current legislation residents are not permitted to reverse out of their driveways on to the Malahide Road; however, it is not illegal to reverse from a driveway onto a road; in accordance with Statutory Instrument S.I. No. 182/1997 - Road Traffic (Traffic and Parking) Regulations, 1997 Section 12 (3) "*A driver shall not reverse from a place adjacent to a public road onto a public road save where it is clear to the driver that to so reverse would not endanger other traffic or pedestrians.*"

Also, in relation to S.I. No. 182/1997 Section 13 Driving on Footway, a vehicle is allowed to be driven across the footpath for the purpose of access to or egress from a place adjacent to the footpath, and in accordance with S.I. No. 182/1997 Section 14 Cycle Tracks that a vehicle is also allowed to be driven across the cycle track for the purpose of access to or egress from a place adjacent to a cycle track.

ii. Noise and access during construction

Section 9.4.3 of EIAR Chapter 9 Noise and Vibration assesses the impact of the construction phase of the Proposed Scheme on noise levels. As summarised in Table 9.24 general road works including junction realignments are within 10m to 30m of the nearest NSLs. The predicted cumulative noise levels for these works at the closest NSL façades are between 69 to 79 dB LAeq,T in the absence of

any noise mitigation. Making reference to the CNLs in Table 9.24 the potential noise impacts at the closest NSLs range between negative, slight to significant, and temporary during the daytime period and negative, moderate to very significant, and temporary during the evening and weekend periods in the absence of noise mitigation. Reference to Table 9.22 indicates that highest noise levels will occur when road planers are operating at the closest distance to NSLs. During specific periods when these activities are operating outside NSL's, higher noise levels will occur compared to those discussed in Table 9.24. These activities will occur, however, for intermittent periods of time at any one location over the course of a working day.

Table 9.41 of Chapter 9 summarises the predicted construction phase impacts following the implementation of mitigation and monitoring measures assessment. For general road works and boundary wall construction works the predicted impact is negative, not significant and temporary at noise sensitive locations at distances greater than 10m from the proposed works.

When roads and streets are being upgraded, there will be some temporary disruption / alterations to on-street and off-street parking provision, and access to premises in certain locations along the Proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. As described in paragraph 5.5.3.1 of Chapter 5 Construction of Volume 2 of the EIAR, details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area. The duration of the works will vary from property to property, but access and egress will be maintained at all times.

iii. Loss of parking

In order to accommodate the required segregated cycle track the Proposed scheme will require between 1.9m and 2.1m of land acquisition from the properties and the demolition and replacement of the existing boundary. The new proposed boundary treatment to the front driveways will be approximately at least 9m wide and will be between 11.6m and 12.7m from the building upon completion of the scheme. This will not significantly affect the availability for parking at the property at these locations.

iv. Noise Impacts

The land acquisition at this location is required to accommodate the required cycle track, with minimal change to the alignment of the existing bus lane at this location. As a result of the Proposed Scheme the edge of the bus lane will be between 0.57m to 0.67m closer to the properties.

Section 9.4.4 of EIAR Chapter 9 Noise and Vibration assesses the impact of the operational phase of the Proposed Scheme on noise levels. As set out in Section 9.4.4.1.1.4 along the Proposed Scheme, a direct, positive, imperceptible to slight, short to medium term impact is calculated (Reference to Table 9.15). This is as a result of reduction in overall traffic volumes through the incorporation of bus priority signals and junctions, restricted turning movements for private vehicles and the incorporation of dedicated bus lanes, cycle lanes and footpaths. The overall direct impact is determined to be positive, imperceptible to slight and short to medium term. The minimal change to the location of the bus lane and general traffic lane at this location (0.57 to 0.67m) will have an imperceptible impact on noise levels at the properties at this location.

v. Landscape Impacts

In order to accommodate the required segregated cycle track the Proposed Scheme will require between 1.9m to 2.0m of land acquisition from the properties which will involve the removal of existing planting along the inside of the existing boundary wall.

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage your its agent / valuer in preparing, negotiating and advising on compensation.

3.3.4 Responses to Individual Objections

Individual responses to all the objections in the Maypark area are included in this section. Objections CPO-18, CPO-23, CPO-25, CPO-26, CPO-27, CPO-28 and CPO-29 are raised the same five issues and the common responses have been provided in Section 3.3.3.

CPO-06 – Fintan and Eileen Murphy

The existing street view at 10 Maypark, Malahide Road is shown in the Figure 3.3.5 below.



Figure 3.3.5: Existing Street View at 10 Maypark, Malahide Road (Image Source: Google)

Issues Raised by Objection

iii. Proximity of property to Malahide Road / Security

The objection asserts that the property will be closer to the main road and footpath leading to an increase in litter and rubbish in their property. As a result, they express the view that 2m high gates and fencing/wall will be required to the new boundary.

iv. Access during operation

The objection raises concerns about access and egress in and out of their driveway if new manual closing gates are fitted which they say would require stopping in the cycle track/ bus lane. They suggest the installation of electric gates and mirrors and also state that Objectors believe residents should be allowed to use the Bus Lanes for access to their properties, with enforcement cameras for the bus lanes.

Response

iii. Proximity of property to Malahide Road /Security

At this location the Proposed Scheme will require approximately 2.0m of land acquisition from the property to accommodate the proposed cycle track, with the boundary walls being replaced on a like for like basis. The potential for littering and dumping of rubbish will not change as result of the new boundary.

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage your its agent / valuer in preparing, negotiating and advising on compensation.

iv. Access during operation

Presently accessing / egressing the properties requires crossing the bus lane and the footpath; with the Proposed Scheme it will also involve crossing the new cycle track. The existing width of the footpath is approximately 2.3m wide. The width of the proposed footpath is 2.0m and the cycle track is 1.75m in front of the properties, with the increase in width crossed 1.45m.

The principle of how residents can access/ egress their properties is unchanged by the scheme proposals. The objections note that under current legislation residents are not permitted to reverse out of their driveways on to the Malahide Road; however, it is not illegal to reverse from a driveway onto a road; in accordance with Statutory Instrument S.I. No. 182/1997 - Road Traffic (Traffic and Parking) Regulations, 1997 Section 12 (3) "*A driver shall not reverse from a place adjacent to a public road onto a public road save where it is clear to the driver that to so reverse would not endanger other traffic or pedestrians.*"

Also, in relation to S.I. No. 182/1997 Section 13 Driving on Footway, a vehicle is allowed to be driven across the footpath for the purpose of access to or egress from a place adjacent to the footpath, and in accordance with S.I. No. 182/1997 Section 14 Cycle Tracks that a vehicle is also allowed to be driven across the cycletrack for the purpose of access to or egress from a place adjacent to a cycle track.)

CPO-15 – Vincent Nolan, Maypark Dental Practice

The existing street view at 7 Maypark, Malahide Road is shown in Figure 3.3.6 below.



Figure 3.3.6: Existing Street View at 7 Maypark, Malahide Road (Image Source: Google)

Issues Raised by Objection

This objection raised three potential issues

- i. Short term disruption to their business;
- ii. Loss of business parking spaces; and
- iii. Business Viability.

Response

- i. Short term disruption to their business

When roads and streets are being upgraded, there will be some temporary disruption / alterations to on-street and off-street parking provision, and access to premises in certain locations along the Proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. As described in paragraph 5.5.3.1 of Chapter 5 Construction of Volume 2 of the EIAR, details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area. The duration of the works will vary from property to property, but access and egress will be maintained at all times.

- ii. Parking Spaces

The proposed footpath will require 2.0m of land take from the resident. The proposed boundary treatment will be at least 12.1m from the property upon completion of the scheme.

As set out in Section 10.4.4.1.2.1 of Chapter 10 Population of Volume 2 of the EIAR, it is assessed that Maypark Dental Practice is expected to experience a Negative, Moderate and Long-Term impact due to a small amount of land take that will be required from the front of the driveway which may restrict parking.

- iii. Business Viability

Section 10.4.4.1.2.1 of Chapter 10 of Volume 2 of the EIAR also notes that the Maypark Dental Practice the Negative, Moderate and Long-Term impact due to the loss of parking is not expected to impact the ability of users to use the facility.

CPO-18 – Jacqueline & Anthony Grant

The existing street view at 6 Maypark, Malahide Road is shown in the Figure 3.3.7 below.



Figure 3.3.7: Existing Street View at 6 Maypark, Malahide Road (Image Source: Google)

For this individual property the proposed footpath will require 2.0m of land take from the resident. The proposed boundary treatment will be at least 12.1m from the property upon completion of the scheme and the bus lane will be at most approximately 0.6m closer to the property compared to the existing situation.

The issues raised by this objection, together with the associated responses, are provided in Section 3.3.3 above.

CPO-23 – David Clarke and Lisa Clarke

The existing street view at 4 Maypark, Malahide Road is shown in the Figure 3.3.8 below.

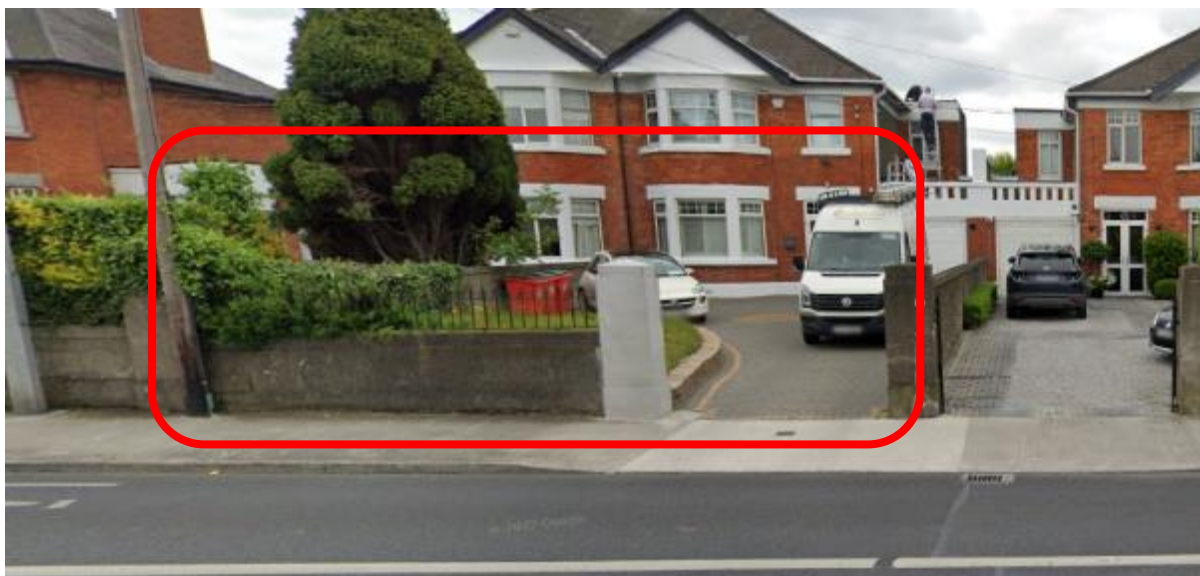


Figure 3.3.8: Existing Street View at 4 Maypark, Malahide Road (Image Source: Google)

For this individual property the proposed footpath will require 1.9m of land take from the resident. The proposed boundary treatment will be at least 12.0m from the residence upon completion of the scheme and the bus lane will be at most approximately 0.6m closer to the residence compared to the existing situation.

The issues raised by this objection, together with the associated responses, are provided in Section 3.3.3 above.

CPO-25 – Vincent Nolan

The existing street view at 8 Maypark, Malahide Road is shown in the Figure 3.3.9 below.



Figure 3.3.9: Existing Street View at 8 Maypark, Malahide Road (Image Source: Google)

For this individual property the proposed footpath will require 2.0m of land take from the resident. The proposed boundary treatment will be at least 11.9m from the residence upon completion of the scheme and the bus lane will be at most approximately 0.6m closer to the residence compared to the existing situation.

The issues raised by this objection, together with the associated responses, are provided in Section 3.3.3 above.

CPO-26 – Thomas Sheridan and Laura Sheridan

The existing street view at 6A Maypark, Malahide Road is shown in the Figure 3.3.10 below.



Figure 3.3.10: Existing Street View at 6A Maypark, Malahide Road (Image Source: Google)

For this individual property the proposed footpath will require 2.0m of land take from the resident. The proposed boundary treatment will be at least 12.7m from the residence upon completion of the scheme and the bus lane will be at most approximately 0.67m closer to the residence compared to the existing situation.

The issues raised by this objection, together with the associated responses, are provided in Section 3.3.3 above.

CPO-27 – Ernie Ramsey

The existing street view at 9 Maypark, Malahide Road is shown in Figure 3.3.11 below.

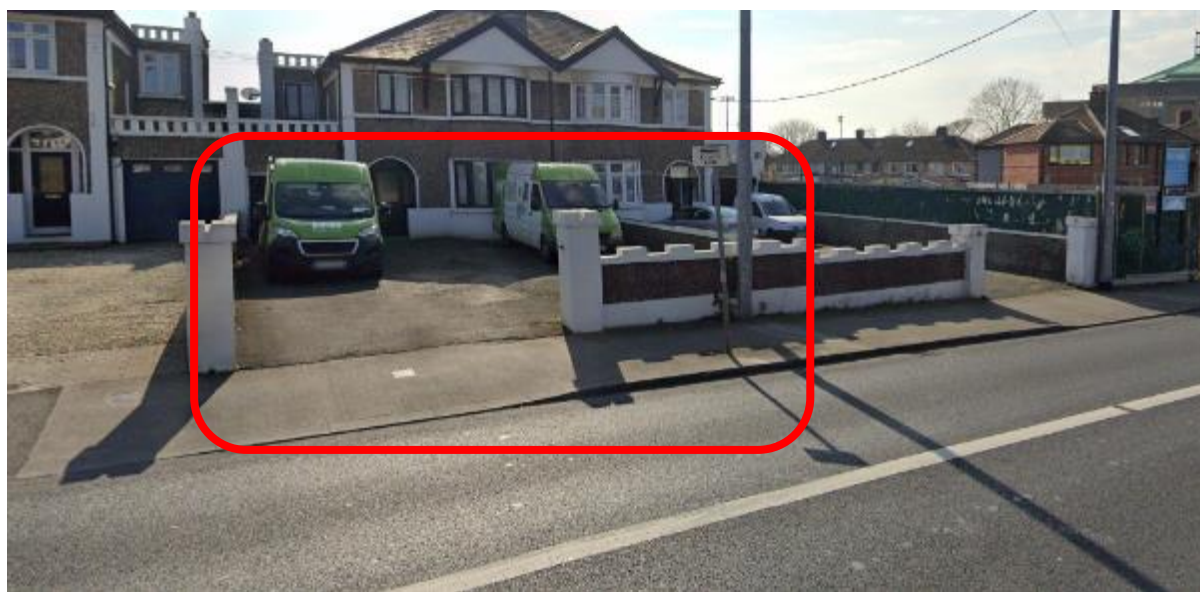


Figure 3.3.11: Existing Street View at 9 Maypark, Malahide Road (Image Source: Google)

For this individual property the proposed footpath will require 2.1m of land take from the resident. The proposed boundary treatment will be at least 11.6m from the residence upon completion of the scheme and the bus lane will be at most approximately 0.57m closer to the residence compared to the existing situation.

The issues raised by this objection, together with the associated responses, are provided in Section 3.3.3 above.

CPO-28 – Michella La Grue and Eamon Farrelly

The existing street view at 5 Maypark, Malahide Road is shown in the Figure 3.3.12 below.



Figure 3.3.12: Existing Street View at 5 Maypark, Malahide Road (Image Source: Google)

For this individual property the proposed footpath will require 2.0m of land take from the resident. The proposed boundary treatment will be at least 12.1m from the residence upon completion of the scheme and the bus lane will be at most approximately 0.6m closer to the residence compared to the existing situation.

The issues raised by this objection, together with the associated responses, are provided in Section 3.3.3 above.

CPO-29 – Maria Manuela Marin Albert

The existing street view at 9 Maypark, Malahide Road is shown in the Figure 3.3.13 below.



Figure 3.3.13: Existing Street View at 9 Maypark, Malahide Road (Image Source: Google)

For this individual property the proposed footpath will require 2.1m of land take from the resident. The proposed boundary treatment will be at least 11.6m from the residence upon completion of the scheme and the bus lane will be at most approximately 0.57m closer to the residence compared to the existing situation.

The issues raised by this objection, together with the associated responses, are provided in Section 3.3.3 above.

3.4 Mornington Park – CPO-04, CPO-11, CPO-21, CPO-22 and CPO-24

3.4.1 Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor, as described in paragraph 4.5.2.1 of Chapter 4 of Volume 2 of the EIAR, between Gracefield Road Junction and Killester Avenue Junction, it is intended to provide a continuous bus lane with a single general traffic lane in each direction. Dedicated cycle tracks and footpath facilities will be provided through this section, including a section of new footpath between Kilmore Road and St. David's Wood.

The existing road cross section over this section provides a footpath on each side, with an advisory cycle lane and one general traffic lane outbound and a bus lane and one general traffic lane inbound. In order to achieve the required cross section of the Proposed Scheme land acquisition is necessary from private properties on both side of the Malahide Road along this section, as shown in the relevant extract of the EIAR Chapter 4 Proposed Scheme Description Appendix the General Arrangement drawings in Figure 3.4.1 and Figure 3.4.2 below and the existing aerial views in Figure 3.4.3 and Figure 3.4.4 below.

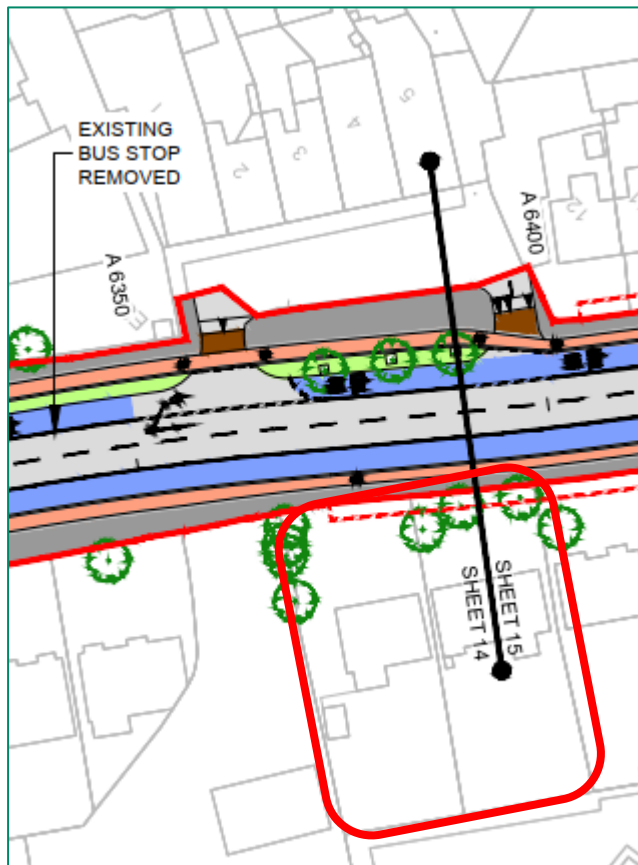


Figure 3.4.1: Proposed new Layout at Northern section of Mornington Park, Malahide Road

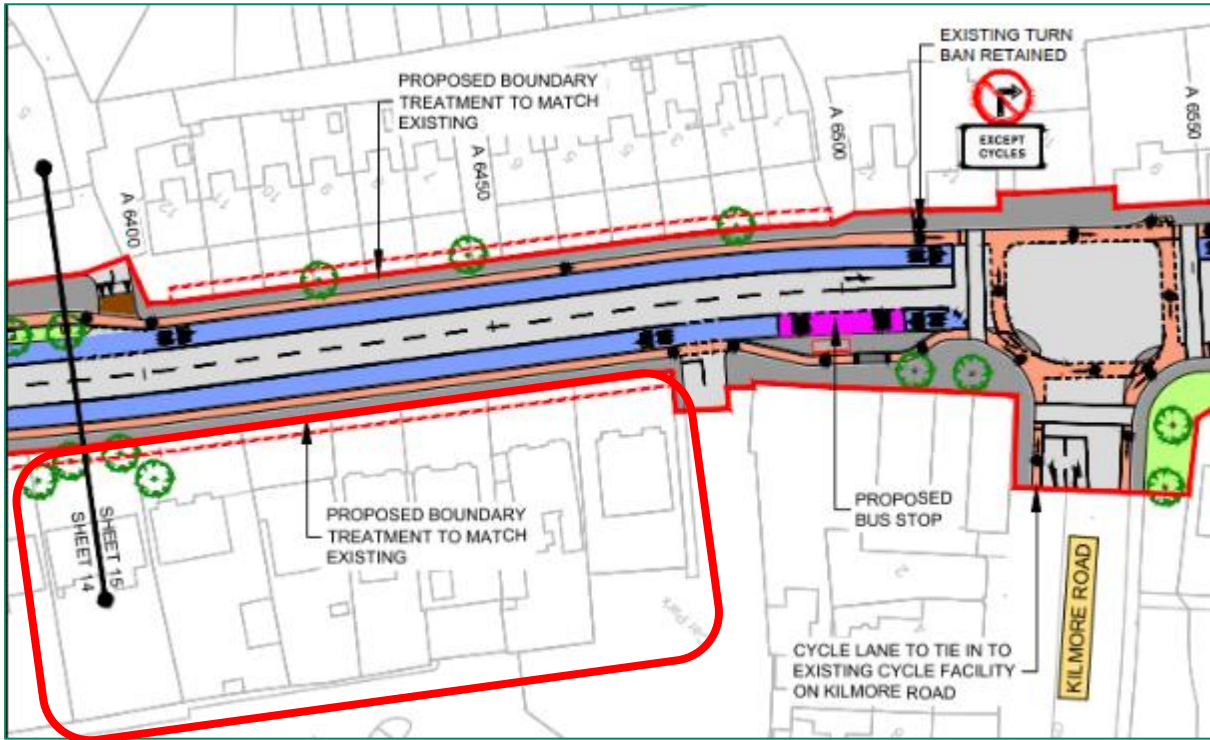


Figure 3.4.2: Proposed new Layout at Southern section of Mornington Park, Malahide Road



Figure 3.4.3: Existing aerial view at Northern section of Mornington Park, Malahide Road



Figure 3.4.4: Existing aerial view at Southern section of Mornington Park, Malahide Road

3.4.2 Summary of Objections Raised

Objections CPO-04, CPO-11, CPO-21, CPO-22, CPO-24 all relate to the same area are responded individually in section 3.4.3 below.

3.4.3 Responses to Individual Objection Letters

CPO-04 – Bernadette Clarke and Maria Clarke

The existing street view at St. Gerard's, Mornington Park, Malahide Road is shown in the Figure 3.4.5 below.

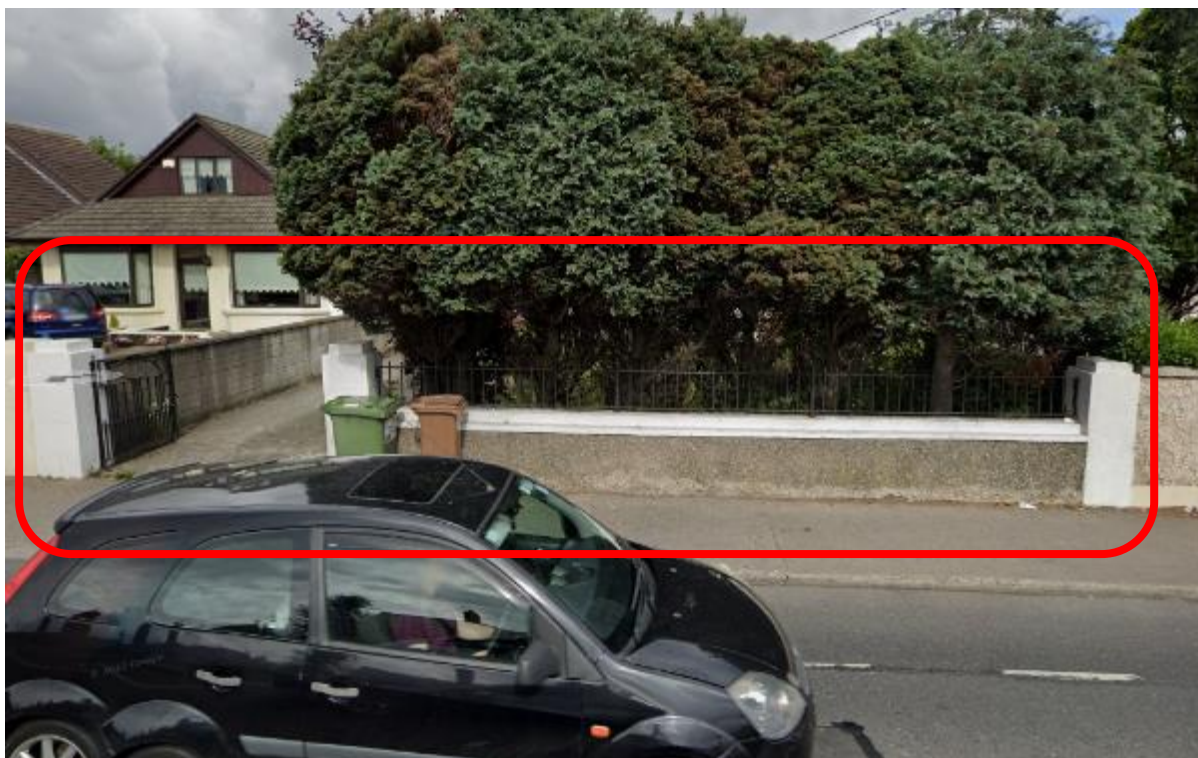


Figure 3.4.5: Existing Street View at St. Gerard's, Mornington Park, Malahide Road (Image Source: Google)

Issues raised by Objection

This objection raised four issues.

- i. Environmental issues: Vibration, noise, air pollution and loss of planting/screening

The objections raised concerns about noise pollution, vibration and loss of privacy as a result of road traffic being closer to the residence and the removal of mature planting.

- ii. Loss of parking / access during operation and construction impact
- iii. Loss of access to wastewater and sewerage
- iv. Alternative proposal for signal controlled priority for buses

Response

- i. Environmental issues: Vibration, noise, air pollution and loss of planting/screening

The permanent acquisition of land between 4.2m to 4.4m of land is to allow for the construction of a 3m wide bus lane, 1.5m wide cycle track and 2.0m wide footpath. The new boundary will be approximately 9.0m from the front of the residence. The proposed new road alignment will move the existing kerb line of the proposed bus lane between 2.4 to 2.7m closer to the residence.

EIAR Chapter 7 Air Quality provides details of the air quality assessment undertaken for the Proposed Scheme. For this section of the corridor this has been assessed as Negligible to Moderate Beneficial as shown in Figures 7.1 and Figures 7.3 to 7.8 of Chapter 7 Air Quality of Volume 3 of the EIAR, in the vicinity of Mornington Park around the monitoring location CBC0001DT006 shown in Figure 7.1.

Section 9.4.4 of EIAR Chapter 9 Noise and Vibration assesses the impact of the operational phase of the Proposed Scheme on noise levels. As set out in Section 9.4.4.1.1.4 along the Proposed Scheme, a direct, positive, imperceptible to slight, short to medium term impact is calculated (Reference to Table 9.15). This is as a result of reduction in overall traffic volumes through the incorporation of bus priority signals and junctions, restricted turning movements for private vehicles and the incorporation of dedicated bus lanes, cycle lanes and footpaths.

In relation to the impact of the Proposed Scheme on noise in the vicinity of Mornington Park, monitoring location CBC0001UNML001, as shown on Sheet 2 of Figure 9.4 of Chapter 9 Noise and Vibration of Volume 3 of the EIAR, this has been assessed as Imperceptible / Positive.

Section 9.4.4.2 of EIAR Chapter 9 Noise and Vibration considers the operational vibration impact of the Proposed Scheme. Analysis of traffic data for the Proposed Scheme indicates a reduction in overall AADT traffic flows along the core bus corridor. Reference to the monitoring results in Table 9.20 and Table 9.21 of Chapter 9 confirms that vibration levels associated with passing buses and other vehicular traffic at distances of 2.5 to 10m from the road edge are negligible in terms of human perception and building response. Vibration levels associated with a passing bus were recorded at 0.1mm/s PPV or less under the monitored scenarios. These values are below the normal range of perceptible human response to vibration and would not pose any significant impact.

In terms of the loss of the mature planting and the details of the proposed new boundary, it is intended that boundaries will be replaced on a like for like basis. If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage its agent / valuer in preparing, negotiating and advising on compensation.

ii. Loss of parking / access during operation and construction impact

Presently accessing / egressing the properties requires crossing the advisory cycle lane and the footpath; with the Proposed Scheme it will also involve crossing the new bus lane, cycle track and footpath, which is permitted under legislation. The new boundary will be approximately 9.0m from the residence.

The principle of how residents can access/ egress their properties is unchanged by the scheme proposals. It is not illegal to reverse from a driveway onto a road; in accordance with Statutory Instrument S.I. No. 182/1997 - Road Traffic (Traffic and Parking) Regulations, 1997 Section 12 (3) "*A driver shall not reverse from a place adjacent to a public road onto a public road save where it is clear to the driver that to so reverse would not endanger other traffic or pedestrians.*"

Also, in relation to S.I. No. 182/1997 Section 13 Driving on Footway, a vehicle is allowed to be driven across the footpath for the purpose of access to or egress from a place adjacent to the footpath, and in accordance with S.I. No. 182/1997 Section 14 Cycle Tracks that a vehicle is also allowed to be driven across the cycle track for the purpose of access to or egress from a place adjacent to a cycle track.

Regarding construction impact, when roads and streets are being upgraded, there will be some temporary disruption / alterations to on-street and off-street parking provision, and access to premises in certain locations along the Proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. As described in paragraph 5.5.3.1 of Chapter 5 of Volume 2 of the EIAR, details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area. The duration of the works will vary from property to property, but access and egress will be maintained at all times.

It is noted that the impact of the proposed scheme on Traffic and Transport has been assessed and is outlined in Chapter 6 Traffic and Transport of the EIAR. Mornington Park is located within Section 2 (2a) of the assessment shown in Figure 6.6 of Chapter 6. It is noted construction of the Proposed Scheme has the potential to impact people's day-to-day activities along the corridor while the works are underway. Chapter 5 Construction and the CEMP Appendix A5.1 in Volume 4 of the EIAR identifies impactful activities, their effects and mitigation measures.

Significant impacts due to general traffic redistribution away from the direct study area are not anticipated during the Construction Phase. There may be a requirement for some localised temporary lane closures for short durations of the day however access for general traffic to existing residential and commercial units immediately adjacent to the Proposed Scheme is to be accommodated throughout the Construction Phase.

Based on the traffic and transport assessment undertaken as part of the EIAR, it is noted the general traffic impacts are described as Negative, Slight and Short-term effect for the Construction Phase. Table 6.11 in section 6.4.5.5 of Chapter 6 of Volume 2, Traffic and Transport, outlines the overall

construction phase impacts for the proposed scheme for walking, cycling, bus, Parking & Loading, and general traffic.

Section 9.4.3 of EIAR Chapter 9 Noise and Vibration assesses the impact of the construction phase of the Proposed Scheme on noise levels. As summarised in Table 9.24 general road works including junction realignments are within 10m to 30m of the nearest NSLs. The predicted cumulative noise levels for these works at the closest NSL façades are between 69 to 79 dB LAeq,T in the absence of any noise mitigation. Making reference to the CNLs in Table 9.24 the potential noise impacts at the closest NSLs range between negative, slight to significant, and temporary during the daytime period and negative, moderate to very significant, and temporary during the evening and weekend periods in the absence of noise mitigation. Reference to Table 9.22 indicates that highest noise levels will occur when road planers are operating at the closest distance to NSLs. During specific periods when these activities are operating outside NSL's, higher noise levels will occur compared to those discussed in Table 9.24. These activities will occur, however, for intermittent periods of time at any one location over the course of a working day.

iii. Loss of access to wastewater and sewerage

The objection raised a concern about access to a drainage manhole in the garden of the property should it be located within the land to be acquired. The Proposed Scheme will not impact on the existing public wastewater and sewerage systems serving the property. The existing public foul sewer is located within the existing Malahide Road corridor as shown on the Foul Water Asset drawings in EIAR Chapter 4 proposed Scheme Description Volume 3 Figures.

iv. Alternative proposal for signal controlled priority for buses

The objection refers to a previous alternative proposal submitted to the NTA suggesting Signal Controlled Priority for buses at this location to avoid the need to widen the road to provide continuous bus lane in the outbound direction.

As set out in Section 3.4.1.1. of EIAR Chapter 3 Alternatives Considered, following on from public consultations, there were requests to minimise the impacts on the properties in Mornington Park on the Malahide Road. It was suggested that reducing the number of bus lanes from two to one would reduce the amount of land required by 3m.

Two options were considered utilising Signal Controlled Bus Priority as follows:

- Option 1: utilise Signal Controlled Priority on the inbound carriageway between Danieli Road and Kilmore Road.
- Option 2: utilise Signal Controlled Priority in the opposite direction on the outbound carriageway between Kilmore Road and Danieli Road.

In reviewing the options and taking the Proposed Scheme objectives into account, it is apparent that while there is benefit in both options in the reduction of land take and disturbance to residences, they do however have a significant disbenefit in regard to ensuring Bus Priority and maintaining the flow of traffic. With regard to Signal Controlled Priority, it is necessary to consider the traffic implications both upstream and downstream of the area under consideration. For the Signal Controlled Priority to operate successfully, queues or tailbacks on the single (shared bus/traffic) lane portion cannot be allowed to develop, as this will result in delays on the bus service and therefore would undermine the bus priority objective.

For Option 1, the signalised junction at Kilmore Road would only allow 3 or 4 cars to queue before impacting on the shared lane section. The Bus Priority signal located at Danieli Road would control all inbound traffic and signalling at Kilmore Road. This would significantly increase the delay to all inbound traffic including buses and other traffic from Kilmore Road.

For Option 2, the signalised junction at Kilmore Road would need to hold general traffic outbound to give priority to the buses. The Bus Priority signal located at Kilmore Road would control all outbound traffic but would have to synchronise with the Ardlea Junction to ensure no tailbacks developed to such an extent that they prevent operation of the Bus Priority. There would be additional delays at Kilmore Road during the operation of the Bus Priority signals including the buses that utilise Kilmore Road. There is also the potential for increase in delay to all inbound traffic including traffic from Kilmore Road.

The Preferred Route Option (PRO) proposal has some advantages in terms of public transport network integration (e.g., better operation of the bus route), and has significant advantages with respect to traffic network integration (e.g., expected traffic impact of each route option) when compared to the alternatives Options 1 and 2. When compared to the PRO Proposal Options 1 and 2 are not considered to enhance the capacity and potential of the public transport system. It will not improve bus speeds, reliability and punctuality through the provision of bus lanes and other measures to provide priority to bus movement over general traffic movements.

Options 1 and 2 have some advantages when compared to the PRO proposal in terms of environmental impact (e.g. reduced land take from residential gardens).

Notwithstanding that Options 1 and 2 have lesser environmental impacts (reduced landtake and associated disturbances to residences) when compared to the PRO proposal it is considered that both these options would not enhance the capacity and potential of the public transport system by improving bus speeds, reliability and punctuality through the provision of bus lanes and other measures to provide priority to bus movement over general traffic movements. Therefore, the PRO proposal has been retained as the preferred option

Further details are provided in in Section 6.1 of the Preferred Route Option (PRO) Report provided as part of the Supplementary Information.

The objection also argues that there is no evidence that the land acquisition at this “pinch point” will have any impact on the journey time of buses and that there is no economic or social justification provided by the NTA for this element of the project.

As set out in Section 3.4.1.1. of EIAR Chapter 3 Alternatives Considered both options have a significant disbenefit in regard to ensuring Bus Priority and maintaining the flow of traffic when compared to the Proposed Scheme arrangement. As explained above, in considering Signal Controlled Bus Priority it is necessary to look at the traffic implications both upstream and downstream of the area under consideration. For the Signal Controlled Priority to operate successfully queues or tailbacks on the single lane portion of the Signal Controlled Priority cannot be allowed to develop as this will result in delays on the bus service.

Section 6.1 of the PRO Report provides further information on the impacts of bus journey time. Currently on the Malahide Road north of Kilmore Road there are 17 buses operating inbound along this section of the Malahide Road during the morning peak, this is expected to increase to 21 by 2028. There are 7 inbound and 6 outbound buses operating along Kilmore Road during the morning peak hour, this is expected to increase to 9 inbound and 7 outbound by 2028.

Finally, the objection expresses the view that vehicles regularly use the bus lanes that undermines the ability of buses to avail of potential journey time savings.

The NTA acknowledge the comments raised in relation to camera enforcement. Whilst enforcement for the lawful use of bus lanes is currently a matter for An Garda Síochána the NTA is separately exploring proposals and methods for bus lane enforcement as set out under *Measure INT20 – Enforcement of Road Traffic Laws* of the Draft Greater Dublin Area Transport Strategy 2022-2042. Notwithstanding this, specific measures have been considered in the development of the Proposed Scheme that will help deter inappropriate and unlawful use of bus lanes including advanced bus signal detection systems which will activate green signals at traffic lights for authorised vehicles only.

CPO-11 – Noel Regazzoli

The existing street view at Sunview, Mornington Park, Malahide Road is shown in the figure below.



Figure 3.4.6: Existing Street View at Sunview, Mornington Park, Malahide Road (Image Source: Google)

Issues raised by Objection

This objection raised four potential issues

- i. Access to Property
- ii. Impact on air and noise
- iii. Loss of landscaping at Property
- iv. Increase in Traffic

Response

- i. Access to Property

The objection sets out that the family has a wheelchair users that requires bus transport daily that usually would park outside their house to provide easy access for the wheelchair. The objection raises a concern that the Proposed Scheme would stop this access and severely affect the wheelchair user's daily routine and life.

The Proposed Scheme includes the provision of a new bus lane on this side of the Malahide Road at this location. As per S.I. No. 182/1997 - Road Traffic (Traffic and Parking) Regulations, 1997 section 39 Parking in Bus Lanes is allowed for taxis or a wheelchair accessible taxis which are stopped while picking up or setting down passengers. As such the Proposed Scheme will not significantly impact the current arrangements in this regard.

- ii. Impact on air and noise

EIAR Chapter 7 Air Quality provides details of the air quality assessment undertaken for the Proposed Scheme. For this section of the corridor this has been assessed as Negligible to Moderate Beneficial as shown in Figures 7.1 and Figures 7.3 to 7.8 of Chapter 7 Air Quality of Volume 3 of the EIAR, in the vicinity of Mornington Park around the monitoring location CBC0001DT006 shown in Figure 7.1.

Section 9.4.4 of EIAR Chapter 9 Noise and Vibration assesses the impact of the operational phase of the Proposed Scheme on noise levels. As set out in Section 9.4.4.1.1.4 along the Proposed Scheme,

a direct, positive, imperceptible to slight, short to medium term impact is calculated (Reference to Table 9.15). This is as a result of reduction in overall traffic volumes through the incorporation of bus priority signals and junctions, restricted turning movements for private vehicles and the incorporation of dedicated bus lanes, cycle lanes and footpaths.

In relation to the impact of the Proposed Scheme on noise in the vicinity of Mornington Park, monitoring location CBC0001UNML001, as shown on Sheet 2 of Figure 9.4 of Chapter 9 Noise and Vibration of Volume 3 of the EIAR, this has been assessed as Imperceptible / Positive.

Section 9.4.4.2 of EIAR Chapter 9 Noise and Vibration considers the operational vibration impact of the Proposed Scheme. Analysis of traffic data for the Proposed Scheme indicates a reduction in overall AADT traffic flows along the core bus corridor. Reference to the monitoring results in Table 9.20 and Table 9.21 of Chapter 9 confirms that vibration levels associated with passing buses and other vehicular traffic at distances of 2.5 to 10m from the road edge are negligible in terms of human perception and building response. Vibration levels associated with a passing bus were recorded at 0.1mm/s PPV or less under the monitored scenarios. These values are below the normal range of perceptible human response to vibration and would not pose any significant impact.

iii. Loss of Landscape on the Property

The objection raises concerns about the loss of 3.5m of their property and the landscape behind the existing property boundary.

The proposed scheme will result in the permanent acquisition of between 2.3m to 3.3m of land, as a result of this acquisition the existing landscaping will be impacted. Reinstatement of property frontage including boundary walls, gates, railings, driveway, footpath and landscaping will be on a like for like basis and detailed accommodation works plans will be prepared in consultation with landowners in line with any formal agreements and in accordance with any embedded mitigations identified in the EIAR or conditions/modifications from An Bord Pleanála in relation to the Proposed Scheme application.

iv. Increase in Traffic

The objection comments that HGV traffic diverts along this section of the Malahide Road every Thursday evening when the Dublin Port Tunnel is closed for maintenance and is concerned about the increase in traffic caused by the proposed scheme. Section 6.4.6.2.8.3 of EIAR Chapter 6 Traffic and Transport notes that there is a slight to very significant reduction in general traffic flows along the direct study area during the AM and PM Peak Hours, which is attributed to the Proposed Scheme and the associated modal shift as a result of its implementation. This reduction in general traffic flow has been determined as an overall Positive, Significant and Long-term effect on the direct study in the AM and PM peak hours.

CPO-21 – Aidan McGovern and Christina McGovern

The existing street view at Maria Philomena, Mornington Park, Malahide Road is shown in the figure below.



Figure 3.4.7: Existing Street View at Maria Philomena, Mornington Park, Malahide Road (Image Source: Google)

Issues raised by the Objection

This objection raised three potential issues.

- i. Proximity of Bus Lane to property leading to loss of privacy and air / noise pollution
- ii. Loss of parking
- iii. Traffic Hazards – access/egress

Response

- i. Proximity of Bus Lane to property leading to loss of privacy and air / noise pollution

The Permanent acquisition will result in the loss of between 4.1m to 4.5m with an additional 2.0m temporarily required to allow for the construction of boundary treatment and tying into the existing garden/driveway. The edge of the proposed bus lane will be 2.2 to 2.7m closer to the residence than the kerb of the existing general traffic lane.

The 14.0m front boundary wall will be at least 7.5m from the front of the house. It is believed that this should not hinder the parking cars at present but there will be the loss of the planted area on the house side of the front boundary wall.

In respect of loss of privacy, if the CPO is confirmed by An Bord Pleanála. Reinstatement of property frontage including boundary walls, gates, railings, driveway, footpath and landscaping will be on a like for like basis and detailed accommodation works plans will be prepared in consultation with landowners in line with any formal agreements and in accordance with any embedded mitigations identified in the EIAR or conditions/modifications from An Bord Pleanála in relation to the Proposed Scheme application.

EIAR Chapter 7 Air Quality provides details of the air quality assessment undertaken for the Proposed Scheme. For this section of the corridor this has been assessed as Negligible to Moderate Beneficial as shown in Figures 7.1 and Figures 7.3 to 7.8 of Chapter 7 Air Quality of Volume 3 of the EIAR, in the vicinity of Mornington Park around the monitoring location CBC0001DT006 shown in Figure 7.1.

Section 9.4.4 of EIAR Chapter 9 Noise and Vibration assesses the impact of the operational phase of the Proposed Scheme on noise levels. As set out in Section 9.4.4.1.1.4 along the Proposed Scheme, a direct, positive, imperceptible to slight, short to medium term impact is calculated (Reference to Table 9.15). This is as a result of reduction in overall traffic volumes through the incorporation of bus priority signals and junctions, restricted turning movements for private vehicles and the incorporation of dedicated bus lanes, cycle lanes and footpaths.

In relation to the impact of the Proposed Scheme on noise in the vicinity of Mornington Park, monitoring location CBC0001UNML001, as shown on Sheet 2 of Figure 9.4 of Chapter 9 Noise and Vibration of Volume 3 of the EIAR, this has been assessed as Imperceptible / Positive.

Section 9.4.4.2 of EIAR Chapter 9 Noise and Vibration considers the operational vibration impact of the Proposed Scheme. Analysis of traffic data for the Proposed Scheme indicates a reduction in overall AADT traffic flows along the core bus corridor. Reference to the monitoring results in Table 9.20 and Table 9.21 of Chapter 9 confirms that vibration levels associated with passing buses and other vehicular traffic at distances of 2.5 to 10m from the road edge are negligible in terms of human perception and building response. Vibration levels associated with a passing bus were recorded at 0.1mm/s PPV or less under the monitored scenarios. These values are below the normal range of perceptible human response to vibration and would not pose any significant impact.

ii. Loss of Parking

The Permanent acquisition will result in the loss of between 4.1m to 4.5m. this will result in the new boundary being at least 7.5m from the front of the house. It is believed that this should not hinder the parking cars at present but there will be the loss of the planted area on the house side of the front boundary wall.

iii. Traffic Hazards from access/egress

The objection raised concerns about traffic hazards being created from the location of the bus stop as sight lines for vehicles entering and leaving their property. The objector is concerned about leaving their property and turning right as they will have to stop on the footpath/cycle path to see the road.

The design of the proposed scheme at this location complies with the visibility requirements set out in section 4.4.5 of DMURS. The Safety Audits undertaken for the Proposed Scheme, included as Appendix M of the Preliminary Design Report provided in the Supplementary Information did not highlight any safety issues with the proposed arrangement in this regard.

Presently accessing / egressing the properties requires crossing the advisory cycle lane and the footpath; with the Proposed Scheme it will also involve crossing the new bus lane, cycle track and footpath, which is permitted under legislation. The new boundary will be approximately 9.0m from the residence.

The principle of how residents can access/ egress their properties is unchanged by the scheme proposals. It is not illegal to reverse from a driveway onto a road; in accordance with Statutory Instrument S.I. No. 182/1997 - Road Traffic (Traffic and Parking) Regulations, 1997 Section 12 (3) "*A driver shall not reverse from a place adjacent to a public road onto a public road save where it is clear to the driver that to so reverse would not endanger other traffic or pedestrians.*"

Also, in relation to S.I. No. 182/1997 Section 13 Driving on Footway, a vehicle is allowed to be driven across the footpath for the purpose of access to or egress from a place adjacent to the footpath, and in accordance with S.I. No. 182/1997 Section 14 Cycle Tracks that a vehicle is also allowed to be driven across the cycletrack for the purpose of access to or egress from a place adjacent to a cycle track.)

CPO-22 – Stephen Flanagan and Family

The existing street view at Upmeads, Mornington Park, Malahide Road is shown in the figure below.



Figure 3.4.8: Existing Street View at Upmeads, Mornington Park, Malahide Road (Image Source: Google)

Issues raised

This objection raised five potential issues

- i. Access / egress
- ii. Health and Safety
- iii. Proximity of building to Proposed Scheme / Safety - The edge of the proposed bus lane will be 1.5 to 2.0m closer to the building than the kerb of the existing general traffic lane.
- iv. Air Quality
- v. Noise Pollution
- vi. Value of Property

Response

- i. Access / egress

The objection raised concern about the inability to turn their car around if the land is acquired. The Permanent acquisition will result in the loss of between 3.4m to 3.9m which will result in the new boundary being at least 8.5m from the front of the house. It is believed that this should not hinder the parking cars at present but there will be the loss of the planted area on the house side of the front boundary wall.

The design allows for the safe use of the access as per the design standards. The new bus lane will be 2.1m closer to the residence but the separation from the boundary wall to the bus lane will increase from 1.6m to 3.5m allowing easier egress from the property.

The principle of how residents can access/ egress their properties is unchanged by the scheme proposals. It is not illegal to reverse from a driveway onto a road; in accordance with Statutory Instrument S.I. No. 182/1997 - Road Traffic (Traffic and Parking) Regulations, 1997 Section 12 (3) "A driver shall not reverse from a place adjacent to a public road onto a public road save where it is clear to the driver that to so reverse would not endanger other traffic or pedestrians."

Also, in relation to S.I. No. 182/1997 Section 13 Driving on Footway, a vehicle is allowed to be driven across the footpath for the purpose of access to or egress from a place adjacent to the footpath, and in accordance with S.I. No. 182/1997 Section 14 Cycle Tracks that a vehicle is also allowed to be

driven across the cycletrack for the purpose of access to or egress from a place adjacent to a cycle track.)

ii. Health and Safety

The objection raised a concern about increased risk of road traffic accident due to the road being closer to the residence and their own health and safety due to the Proposed Scheme being so close to their residence.

As mentioned in the response above, the proposed footpath will require a loss of between 3.4m to 3.9m of permanent land take from the property. It is intended to replace existing boundaries on a like for like basis. The proposed boundary treatment will be at least 8.5m from the residence upon completion of the scheme. The new bus lane will be 1.5 to 2.0m closer to the residence but the separation from the boundary wall to the bus lane will increase from 1.6m to 3.5m.

iii. Air Quality

EIAR Chapter 7 Air Quality provides details of the air quality assessment undertaken for the Proposed Scheme. For this section of the corridor this has been assessed as Negligible to Moderate Beneficial as shown in Figures 7.1 and Figures 7.3 to 7.8 of Chapter 7 Air Quality of Volume 3 of the EIAR, in the vicinity of Mornington Park around the monitoring location CBC0001DT006 shown in Figure 7.1.

iv. Noise Pollution

Section 9.4.4 of EIAR Chapter 9 Noise and Vibration assesses the impact of the operational phase of the Proposed Scheme on noise levels. As set out in Section 9.4.4.1.1.4 along the Proposed Scheme, a direct, positive, imperceptible to slight, short to medium term impact is calculated (Reference to Table 9.15). This is as a result of reduction in overall traffic volumes through the incorporation of bus priority signals and junctions, restricted turning movements for private vehicles and the incorporation of dedicated bus lanes, cycle lanes and footpaths.

In relation to the impact of the Proposed Scheme on noise in the vicinity of Mornington Park, monitoring location CBC0001UNML001, as shown on Sheet 2 of Figure 9.4 of Chapter 9 Noise and Vibration of Volume 3 of the EIAR, this has been assessed as Imperceptible / Positive.

Section 9.4.4.2 of EIAR Chapter 9 Noise and Vibration considers the operational vibration impact of the Proposed Scheme. Analysis of traffic data for the Proposed Scheme indicates a reduction in overall AADT traffic flows along the core bus corridor. Reference to the monitoring results in Table 9.20 and Table 9.21 of Chapter 9 confirms that vibration levels associated with passing buses and other vehicular traffic at distances of 2.5 to 10m from the road edge are negligible in terms of human perception and building response. Vibration levels associated with a passing bus were recorded at 0.1mm/s PPV or less under the monitored scenarios. These values are below the normal range of perceptible human response to vibration and would not pose any significant impact.

v. Value of Property

The objection has concerns about the loss of property value and cites that they had tried to sell the property but it has not sold due to the uncertainty, with nearly every party citing the planned works.

EIAR Chapter 10 Population includes Appendix A10.2 Economic Impact of the Core Bus Corridors. Section 3 on page 14 the appendix discusses the impact of the Proposed Scheme on property prices. The conclusion reached is that in overall terms the public realm improvements planned by the NTA may lead to an increase in value of both residential and retail property prices, especially in the community centres along the corridors, with evidence showing that investing in public realm creates nicer places that are more desirable for people and business to locate in, thereby increasing the value of properties in the area.

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage your its agent / valuer in preparing, negotiating and advising on compensation.

CPO-24 – Sherry Abraham and Bijo George

The existing street view at Helensville, Malahide Road is shown in the figure below.



Figure 3.4.9: Existing Street View at Helensville, Malahide Road (Image Source: Google)

Issues raised

This objection raised five potential issues

- i. Unsatisfactory consultation and engagement, particularly during covid
- ii. Alternative options not considered
- iii. Loss of parking
- iv. Access/egress
- v. Air and Noise Pollution
- vi. Loss of privacy/planting /compensation

Response

- i. Unsatisfactory consultation and engagement, particularly during covid

The objection raises a number of concerns in respect of the consultation undertaken for the Proposed Scheme, particular in light of government restrictions during the Covid pandemic.

The Public Consultation Report 2018-2022 provided in the Supplementary Information for the Proposed Scheme outlines the extensive public consultation and stakeholder engagement undertaken during that period, with three rounds of non-statutory public consultation undertaken.

Throughout the three rounds a number of consultation tools were used, including:

- a dedicated website, launched in May 2017;
- an individual brochure for the Proposed Scheme (updated at all 3 rounds);
- public information events (in person for first and second rounds, virtual for third round),

- Community Forum events, to create a two-way communication process with representatives of local communities, (in person for first and second rounds, virtual for third round, average attendees 24);
- range of digital channels, including Twitter and Facebook;
- traditional published material;
- press and radio advertising;
- outdoor advertising;
- presentations; and
- infographics.

The public events took place in accessible venues chosen to maximise the level of local engagement and attendance where possible. These events allowed members of the public to speak directly and in detail with members of the BusConnects Infrastructure team about the proposals. These non-statutory Public Information Events were advertised in local newspapers, through radio, on the BusConnects website, through extensive email reminders to public representatives, Local Authorities' Public Partnership Networks (PPN's), emails to Community Forum members, promoted through social media and digital channels.

The following paragraphs provide more details of each of the three rounds on non-statutory consultation for the Proposed Scheme.

First non-statutory round of public consultation

The first non-statutory round of public consultation for the Clongriffin to City Centre Core Bus Corridor Emerging Preferred Route Option (EPRO) took part from 14th November 2018 on the 29th March 2019. The first Community Forum meeting for the Clongriffin to City Centre Core Bus Corridor took place on 11th December 2018 at the Hilton Hotel, Malahide Road with approximately 20 representatives in attendance. A Public Information Event was held at the Hilton Hotel, Malahide Road on the 10th January 2019.

Second non-statutory round of public consultation

A second Community Forum event was held at the Hilton Hotel, Malahide Road on the 11th September 2019, with approximately 15 in attendance. This Community Forum was held in advance of the launch of second round of non-statutory public consultation. The meeting aimed to keep members updated on the design process between the first and second consultation.

In March 2020, the Draft Preferred Route Option (PRO) was published and a second non-statutory round of public consultation commenced on 4 March 2020 and ran until 17 April 2020. The consultation was announced via press release and a media press release and included a Public Information Event at the Bonnington Hotel in Whitehall on the 11th March 2020.

Due to the COVID-19 pandemic, all events scheduled after 12 March 2020 were cancelled. In deference to the submissions we had already received, the decision was made not to cancel the consultation. Consequently, there were just 30 submissions received relating to the Clongriffin to City Centre Core Bus Corridor.

Third non-statutory round of public consultation

The third round of non-statutory public consultation took place from 4th November 2020 until 16th December 2020 on the updated Draft Preferred Route Option for the Proposed Scheme. The consultation was announced via press release, on the NTA website and on social media. Public representatives were made aware of the publication of the revised proposals via email. This email also contained information on Community Forums for TDs, Senators and Councillors to assist in spreading awareness of the meetings. A briefing session was organized via Zoom to take place on 4 November 2020. Members of the Transport & Communications Networks Oireachtas Committee were separately made aware of the launch.

Due to the Covid19 pandemic, which commenced with restrictions in March 2020 and continued throughout the second and third public consultation rounds, the BusConnects Infrastructure team developed online and virtual elements to assist the public in viewing and reading the proposals. Our primary virtual interactive tool during the final third phase of public consultation was the use of virtual consultation rooms available through the BusConnects website. These rooms were online for a six week period (24hrs x 7 days a week) and included the following:

- all Scheme materials available for perusal, such as the brochure, maps and all associated support documentation;
- an audio description of the brochure information; and
- a call back facility within the virtual rooms for any stakeholder to book a phone call back from a member of the BusConnects Infrastructure team for additional information or more detailed queries.

These Virtual Consultation Rooms replaced the more traditional Public Information Events due to the Covid restrictions on face-to-face interactions, typically used during non-statutory public consultation. Compared to the face-to-face Public Information Events utilised during the first round of Non-Statutory Public Consultation the numbers of the public that engaged increased significantly due to the online access available through this facility. Over the seven weeks of the consultation, 363 unique users visited the virtual information room for Clongriffin to City Centre Core Bus Corridor.

In addition, a third Centre Community Forum meeting took place on 18th November 2020 with approximately 15 representatives in attendance.

Following each of the three rounds of non-statutory public consultation the feedback / submissions were reviewed and the views expressed were considered in the design development process.

In addition, representatives from the NTA have previously phoned and directly called to the residence to discuss the concerns with the impacted parties.

ii. Alternative options not considered

The objection expressed the view that the NTA have not considered alternative options adequate.

As set out in Section 3.4.1.1. of EIAR Chapter 3 Alternatives Considered, following on from public consultations, there were requests to minimise the impacts on the properties in Mornington Park on the Malahide Road. It was suggested that reducing the number of bus lanes from two to one would reduce the amount of land required by 3m.

Two options were considered utilising Signal Controlled Bus Priority as follows:

- Option 1: utilise Signal Controlled Priority on the inbound carriageway between Danieli Road and Kilmore Road.
- Option 2: utilise Signal Controlled Priority in the opposite direction on the outbound carriageway between Kilmore Road and Danieli Road.

In reviewing the options and taking the Proposed Scheme objectives into account, it is apparent that while there is benefit in both options in the reduction of land take and disturbance to residences, they do however have a significant disbenefit in regard to ensuring Bus Priority and maintaining the flow of traffic. With regard to Signal Controlled Priority, it is necessary to consider the traffic implications both upstream and downstream of the area under consideration. For the Signal Controlled Priority to operate successfully, queues or tailbacks on the single (shared bus/traffic) lane portion cannot be allowed to develop, as this will result in delays on the bus service and therefore would undermine the bus priority objective.

For Option 1, the signalised junction at Kilmore Road would only allow 3 or 4 cars to queue before impacting on the shared lane section. The Bus Priority signal located at Danieli Road would control all inbound traffic and signalling at Kilmore Road. This would significantly increase the delay to all inbound traffic including buses and other traffic from Kilmore Road.

For Option 2, the signalised junction at Kilmore Road would need to hold general traffic outbound to give priority to the buses. The Bus Priority signal located at Kilmore Road would control all outbound traffic but would have to synchronise with the Ardlea Junction to ensure no tailbacks developed to such an extent that they prevent operation of the Bus Priority. There would be additional delays at Kilmore Road during the operation of the Bus Priority signals including the buses that utilise Kilmore Road. There is also the potential for increase in delay to all inbound traffic including traffic from Kilmore Road.

The Preferred Route Option (PRO) proposal has some advantages in terms of public transport network integration (e.g., better operation of the bus route), and has significant advantages with respect to traffic network integration (e.g., expected traffic impact of each route option) when compared to the alternatives Options 1 and 2. When compared to the PRO Proposal Options 1 and 2 are not considered to enhance the capacity and potential of the public transport system. It will not improve bus speeds, reliability and punctuality through the provision of bus lanes and other measures to provide priority to bus movement over general traffic movements.

Options 1 and 2 have some advantages when compared to the PRO proposal in terms of environmental impact (e.g. reduced land take from residential gardens).

Notwithstanding that Options 1 and 2 have lesser environmental impacts (reduced landtake and associated disturbances to residences) when compared to the PRO proposal it is considered that both these options would not enhance the capacity and potential of the public transport system by improving bus speeds, reliability and punctuality through the provision of bus lanes and other measures to provide priority to bus movement over general traffic movements. Therefore, the PRO proposal has been retained as the preferred option

Further details are provided in in Section 6.1 of the Preferred Route Option (PRO) Report provided as part of the Supplementary Information.

The objection also argues that there is no evidence that the land acquisition at this “pinch point” will have any impact on the journey time of buses and that there is no economic or social justification provided by the NTA for this element of the project.

As set out in Section 3.4.1.1. of EIAR Chapter 3 Alternatives Considered both options have a significant disbenefit in regard to ensuring Bus Priority and maintaining the flow of traffic when compared to the Proposed Scheme arrangement. As explained above, in considering Signal Controlled Bus Priority it is necessary to look at the traffic implications both upstream and downstream of the area under consideration. For the Signal Controlled Priority to operate successfully queues or tailbacks on the single lane portion of the Signal Controlled Priority cannot be allowed to develop as this will result in delays on the bus service.

Section 6.1 of the PRO Report provides further information on the impacts of bus journey time. Currently on the Malahide Road north of Kilmore Road there are 17 buses operating inbound along this section of the Malahide Road during the morning peak, this is expected to increase to 21 by 2028. There are 7 inbound and 6 outbound buses operating along Kilmore Road during the morning peak, this is expected to increase to 9 inbound and 7 outbound by 2028.

iii. Loss of Parking

The objection noted the residents have 5 cars parked on the private drive which will be reduced to 2 as a result of the proposed works which will lead to paid parking costs for them.

The design allows for the safe use of the access as per the design standards. The existing footpath is 1.7m wide and the proposed footpath will be widened to 2.0m which will allow easier use when egressing the access.

The Permanent acquisition will result in the loss of between 4.0m to 4.2 m this will result in the new boundary being at least 7.0m from the front of the house. It is believed that this should not hinder parking cars but there will be the loss of the planted area on the house side of the front boundary wall.

iv. Access/egress

The objection raised concern about the inability to turn their car around if the land is acquired. The Permanent acquisition will result in the loss of between 4.0m to 4.2 m this will result in the new boundary being at least 7.0m from the front of the house. It is believed that this should not hinder the parking of cars but there will be the loss of the planted area on the house side of the front boundary wall.

The design allows for the safe use of the access as per the design standards. The new bus lane will be 2.1m closer to the residence but the separation from the boundary wall to the bus lane will increase from 1.6m to 3.5m allowing easier egress from the property.

The principle of how residents can access/ egress their properties is unchanged by the scheme proposals. It is not illegal to reverse from a driveway onto a road; in accordance with Statutory Instrument S.I. No. 182/1997 - Road Traffic (Traffic and Parking) Regulations, 1997 Section 12 (3) “A driver shall not reverse from a place adjacent to a public road onto a public road save where it is clear to the driver that to so reverse would not endanger other traffic or pedestrians.”

Also, in relation to S.I. No. 182/1997 Section 13 Driving on Footway, a vehicle is allowed to be driven across the footpath for the purpose of access to or egress from a place adjacent to the footpath, and in accordance with S.I. No. 182/1997 Section 14 Cycle Tracks that a vehicle is also allowed to be driven across the cycletrack for the purpose of access to or egress from a place adjacent to a cycle track.)

v. Air and Noise Pollution

The objection raises concerns in relation to the air and noise pollution that will be caused as a result of the scheme.

EIAR Chapter 7 Air Quality provides details of the air quality assessment undertaken for the Proposed Scheme. For this section of the corridor this has been assessed as Negligible to Moderate Beneficial as shown in Figures 7.1 and Figures 7.3 to 7.8 of Chapter 7 Air Quality of Volume 3 of the EIAR, in the vicinity of Mornington Park around the monitoring location CBC0001DT006 shown in Figure 7.1.

Section 9.4.4 of EIAR Chapter 9 Noise and Vibration assesses the impact of the operational phase of the Proposed Scheme on noise levels. As set out in Section 9.4.4.1.4 along the Proposed Scheme, a direct, positive, imperceptible to slight, short to medium term impact is calculated (Reference to Table 9.15). This is as a result of reduction in overall traffic volumes through the incorporation of bus priority signals and junctions, restricted turning movements for private vehicles and the incorporation of dedicated bus lanes, cycle lanes and footpaths.

In relation to the impact of the Proposed Scheme on noise in the vicinity of Mornington Park, monitoring location CBC0001UNML001, as shown on Sheet 2 of Figure 9.4 of Chapter 9 Noise and Vibration of Volume 3 of the EIAR, this has been assessed as Imperceptible / Positive.

vi. Loss of privacy/planting /compensation

The objection states that the acquisition of land will lead to a loss privacy and security, as well the loss of planting on the property side of the boundary wall.

The permanent acquisition will result in the loss of between 4.0m to 4.2m with an additional 2.0m temporarily required to allow for the construction of boundary treatment and tying into the existing garden/driveway. Reinstatement of property frontage including boundary walls, gates, railings, driveway, footpath and landscaping will be on a like for like basis and detailed accommodation works plans will be prepared in consultation with landowners in line with any formal agreements and in accordance with any embedded mitigations identified in the EIAR or conditions/modifications from An Bord Pleanála in relation to the Proposed Scheme application.

In regard to compensation, if the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage your its agent / valuer in preparing, negotiating and advising on compensation.

3.5 Winston Ville 62-64 Malahide Road – CPO-07 & CPO-30

3.5.1 Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor, as described in paragraph 4.5.2.1 of Chapter 4 Proposed Scheme Description of Volume 2 of the EIAR, between Griffith Avenue Junction and Clontarf Road Junction, it is proposed to continue the bus and general traffic lanes in both directions. There are currently only three traffic lanes on this section of road. An alternative offline cycle facility is proposed along this section of the Proposed Scheme in lieu of providing dedicated cycle tracks to specifically minimise the residual impacts resulting from landtake on properties through this section. A new 2m wide footpath will be provided at this location and the road centreline will be adjusted.

At 62 Malahide Road the width of land to be acquired ranges from 0.55m to 0.65m (CPO plot reference: 1048(1).1d) in order to accommodate the proposed cross section. At 64 Malahide Road the width of land to be acquired ranges from 0.51m to 0.55m (CPO plot reference: 1047(1).1d) in order to accommodate the proposed cross section. For both properties this will require the reconstruction of the boundary stub wall and railings as well as relocation of the vehicular gates.

The relevant extract from EIAR Chapter 4 Appendix showing the General Arrangement drawings in Figure 3.5.1, the existing aerial view is shown in Figure 3.5.2 and the existing street view is shown in Figure 3.5.3 below.

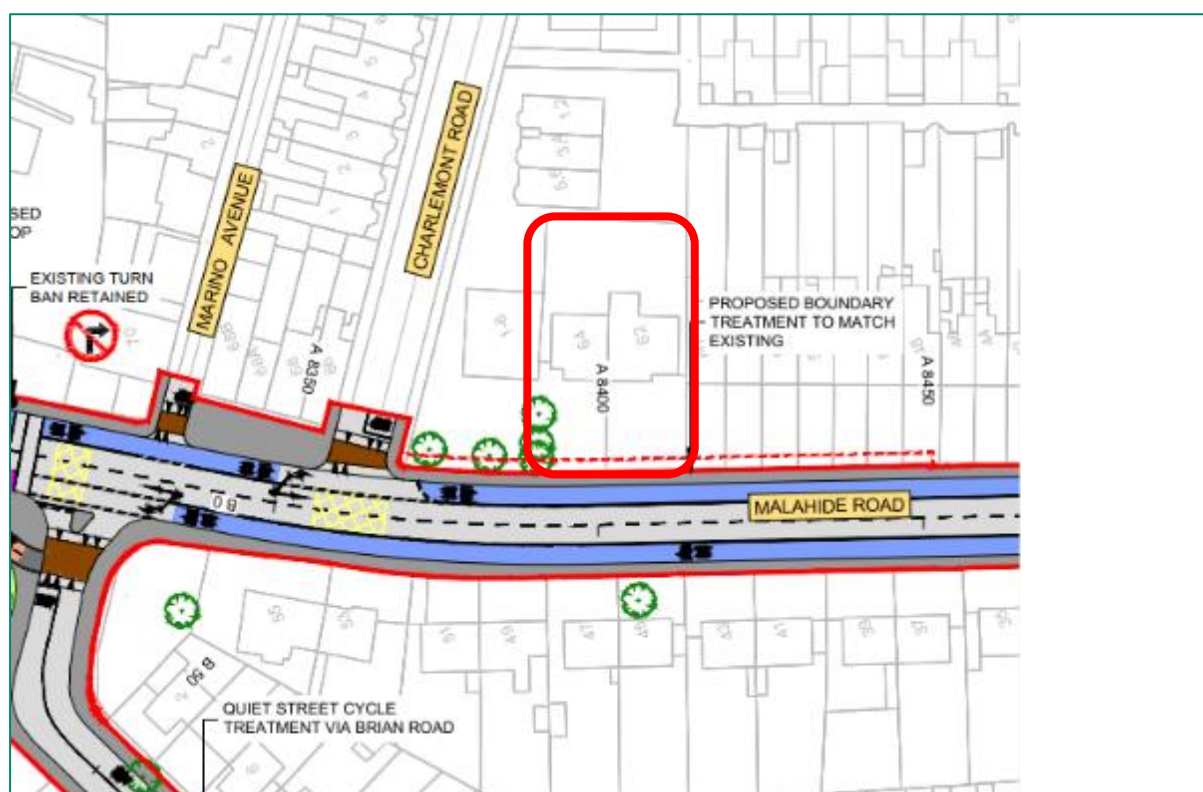


Figure 3.5.1: Proposed new Layout at Winston Ville 62 and 64 Malahide Road



Figure 3.5.2: Existing aerial view at Winston Ville 62 and 64 Malahide Road



Figure 3.5.3: Existing Street View at Winston Ville 64 and 62 Malahide Road (Image Source: Google)

3.5.2 Summary of Objections Raised

These two objections, whilst not identical, did have a very high degree of similarity. The same 24 numbered issues were raised in each of the objections, albeit in a slightly different order and with slightly different wording for some issues. The 24 issues have been summarised into the 7 key topics below and further discussed in subsequent sections.

- i. Land Acquisition
- ii. Health and Safety
- iii. Traffic Calming Measures
- iv. Noise & Environment
- v. Lack of Detail
- vi. Accommodation Works Comments
- vii. Disturbance matters

The issues raised are grouped and summarised below with original headings from the submissions also provided (where different or grouped) for context:

- i. Land Acquisition (Permanent/Temporary Acquisition, Viability and Value, Proximity to House, Route Selection Issues, Road Alignment)

The objections do not accept either the permanent or temporary land acquisition proposed which they believe is in excess of what is required for the scheme. The objections have stated that the design of the road is such as to cause a severe negative impact on the viability and/or value and character of the buildings to such an extent that no amount of money will adequately compensate for the losses and damage to the operations and enjoyment of this property arising from this proposed new road scheme. Both objections note that each of the houses are listed. The objections have stated that the proposed new road runs very close to their house to such an extent that it will be very difficult to reside there as intended when originally purchased. The objections raise a concern that alternative routes for the proposed works have not been adequately assessed to provide the service required while protecting the health and safety of the residents of Winston Ville and the local environment. The objections express the view that the scheme lacks imagination in using more bus lanes and traffic lights for buses over cars to avoid widening the road.

- ii. Health and Safety

The objections state that there are insufficient details provided in relation to the assessment of health and safety for their family and access to their property.

- iii. Traffic Calming Measures

The objections state that there are insufficient details provided on the new road way such as plans for speed bumps and other traffic calming measures.

- iv. Noise & Environment

The objections express the view that inadequate information is provided regarding the mitigation measures that are being proposed to control noise pollution, particularly bringing so much active traffic closer to their home as well as noise generated during the construction period.

The objections assert that the road development will have significant environmental impacts causing irreversible damage to both the local environment fauna and flora, soil, water, air, climate, the landscape and human beings.

- v. Lack of Detail (Access -General, Services, Drainage, Lighting, Screening and Planting, Boundary Treatment).

The objections raise concerns about the level of detail in relation to access to their property via their electric gated driveways and pedestrian gates during and after the proposed works. The objections

states that the level of detail provided is inadequate under a number of headings; services, drainage, lighting, screening and planting, setback distances and boundary treatment.

vi. Accommodation Works Comments (Access Road Details, Setback Distances)

The objections raise concern about the proposal as their driveways would require new gated access to the property because of the works. The objections also raise concerns about the access to their property not being addressed in the proposal and no information on providing adequate space for a turning circle for their vehicles. The objection requests clarification on the setback distance for buildings from the roadway.

vii. Disturbance Matters (Temporary Accommodation, Impact to Work, Road Closures, Road Levels)

The objections have set out that no attempt has been made to assist them with relocation to an alternative site or dwelling or to accommodate their family within the design of the Proposed Scheme. The objections also note that they work remotely from home and note that the scheme will cause severe negative impact on their ability to remain focused during the construction of the proposed works. The objections have stated that they object to road closure and the potential for variation in road levels.

3.5.3 General Response to Objections Raised

i. Land Acquisition

The proposed permanent acquisition at 62 Malahide Road ranges from 0.55m to 0.65m in width and the proposed permanent acquisition at 64 Malahide Road ranges from 0.51m to 0.55m width. A proposed 2.0m wide temporary acquisition is proposed for both properties to allow for building new boundary treatment and tie in the proposed scheme to the existing driveway. A new 2m wide footpath will be provided at this location and the road centreline will be adjusted.

In relation to the impacts on these properties, the environmental impact assessment for the Proposed Scheme has assessed the potential impacts at this location and further summarised below.

The present Malahide Road does not have an outbound bus lane at this location. The provision of a bus lane at this location will be key to ensuring a reliable and efficient service can be provided which can support the Proposed Scheme objectives. Chapter 3 of the EIAR, Consideration of Reasonable Alternatives, sets out the route options assessment process to determine the Preferred Route Option for the Proposed Scheme. As outlined in section 3.3.2.2 of Chapter 3 due consideration has been given to minimize impact on properties from Griffith Avenue to Clontarf Road where the road cross section is particularly constrained. It was not considered feasible to provide dedicated bus, cycle and traffic lanes in both directions along this section, as this would have had a greater impact on residential properties in the area including the removal of off-street parking in the front of a number of the properties with no suitable alternatives available. Section 3.4.1.2 of Chapter 3 also outlines that Signal Controlled Priority on the inbound carriageway between Charlemont Road and Crescent Place was considered. In reviewing this proposal, and taking the Proposed Scheme objectives into account, it is considered that while there is benefit in the reduction of land take and disturbance to residences, they do however have a significant disadvantage in regard to ensuring Bus Priority. The junction of Clontarf Road and the Malahide Road is currently operating at capacity and it is considered that there is a high possibility of vehicles queuing back to Crescent Place and thus preventing inbound buses re-joining the Bus Lane. This would impact the reliability and punctuality of the inbound buses. For these reasons a dedicated bus lane is proposed to meet the objective to enhance the capacity and potential of the public transport system to provide priority to bus movement over general traffic movements.

Table 16.7 of Chapter 16 Architectural Heritage outlines the locations of the Protected Structures along the Proposed Scheme which includes the referenced RPS 4852-3 houses at 62 and 64 Malahide Road. The impact of the proposed works at this location is set out in section 16.4.3.1 which notes that the current boundary is not the original and the railings, gates and capping stones have been previously replaced with good quality replicas and vehicular entrances have been added. As set out in Section 17.4.4.1.11 of Chapter 17 Landscape (Townscape) & Visual, the new boundary treatment will be reinstated at setback location. Overall, there would be a relatively small loss of

private / garden area which will result in a partial loss of landscape amenity space, but there would be no notable change to the key characteristics of these properties.

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on each landowner whose land is being acquired. Following service of the Notice to Treat, each landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage their own agent / valuer in preparing, negotiating and advising on compensation.

ii. Health and Safety

As described in paragraph 5.5.3.1 of Chapter 5 of Volume 2 of the EIAR, details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. The duration of the works will vary from property to property, however access and egress will be maintained at all times.

Similarly, as outlined in Section 5.1.6 of Appendix A5.1 Construction Environmental Management Plan (CEMP) of the EIAR, a Communications Plan in accordance with the NTA's requirements will be put in place by the contractor. This Plan will provide a mechanism for members of the public to communicate with the NTA and the appointed contractor, and for the NTA and the appointed contractor to communicate important information on various aspects of the Proposed Scheme to the public. The Plan will include procedures to inform members of the community directly affected by the Construction Phase on schedules for any activity of a particularly disruptive nature which is likely to impinge on their property such as boundary works, road closures and diversions, and any mitigating actions that are being taken to minimise such disruption.

iii. Traffic Calming Measures

Drawings showing layouts relating to road marking, layout and traffic signalling are included Volume 3 Figures, Chapter 4 Proposed Scheme Description of the EIAR. It is noted that there are no speed humps on the Malahide Road in the vicinity of 62/64 Malahide Road however there are a number of raised table crossings on side roads such as Charlemont Road, Brian Road, Marino Avenue all within the vicinity to 62/64 Malahide Road.

There are a number of traffic calming measures that have been implemented in the Proposed Scheme that will reduce speeds including improved junction layouts with reduced corner radii, narrow carriageway lane widths, raised table crossings on side roads, proposed speed limit reduction at the outer dual carriageway portion of the Proposed Scheme from 60kmph to 50kmph and speed humps on side streets (e.g. St Brendan's Avenue). The additional landscaping and enhanced pedestrian/cyclist priority measures along the Proposed Scheme will also lend themselves to the principles of self-regulating streets as set out in DMURS to encourage lower driving speeds.

iv. Noise & Environment

Figures 9.3 to Figures 9.5 of Chapter 9 of Volume 3 of the EIAR indicate the predicted noise impacts in relation to the Proposed Scheme.

- Figure 9.3 Construction Traffic Noise Impact Summary Sheet 3 of 3, assesses the impact as not significant at this location.
- Figure 9.4 Opening Year 2028 Traffic Noise Impact Summary Sheet 3 of 3, assesses the impact as Imperceptible/Positive at this location
- Figure 9.5 Design Year 2043 Traffic Noise Impact Summary Sheet 3 of 3, assesses the impact as Imperceptible/Positive at this location.

With regard to operational noise impacts, Section 9.4.4.1.1.5 of the EIAR Chapter 9 Noise and Vibration notes along the Proposed Scheme, a direct, positive, imperceptible to slight, short to medium term impact is calculated for the 2028 opening year as a result of reduction in overall traffic volumes through the incorporation of bus priority signals and junctions, restricted turning movements for private vehicles and the incorporation of dedicated bus lanes, cycle lanes and footpaths. Similarly, along the Proposed Scheme, a direct, positive, imperceptible to slight, long-term impact is calculated for the design year 2043. The overall significance ratings are lower for the design year compared to the year of opening due to :

- The magnitude of change ratings for the long term period are less significant compared to the year of opening due to the recognised habituation to traffic noise environment over time; and
- Overall traffic volumes forecast along the core bus corridor and surrounding road network are reduced during the design year compared to the opening year due to modal shift to public transport.

It is likely that a further reduction in overall noise level will occur along the Proposed Scheme due to the transition towards a full EV and HEV bus fleet, this reduction will occur irrespective of the Proposed Scheme.

With regard to construction impacts, where reasonably practicable to do so, works will be carried out during normal working hours and in consultation with local residents as described previously under Health and Safety issue.

As set out in Appendix A5.1 Construction Environmental Management Plan (CEMP) of the EIAR, there are a number of specific noise mitigation and monitoring measures that will be implemented including the following:

NV2: The appointed contractor will put in place the most appropriate noise control measures depending on the level of noise reduction required at individual working areas i.e., based on the construction threshold values for noise and vibration set out in Tables 9.7 and 9.10 in Chapter 9 (Noise & Vibration) of this EIAR. Reference to Table 9.37 in Chapter 9 (Noise & Vibration) of this EIAR indicates that intrusive works occurring within 25m to 45m of Noise Sensitive Locations (NSLs) will need specific noise control measures to reduce impacts depending on the time period over which they will occur, i.e., daytime or evening.

NV8: Construction activities will be scheduled in a manner that reflects the location of the site and the nature of neighbouring properties. Construction activities / plant or equipment items will be considered with respect to their potential to exceed construction noise thresholds at NSLs and will be scheduled according to their noise level, proximity to sensitive locations and possible options for noise control. In situations where an activity with potential for exceedance of construction noise thresholds is scheduled (e.g., road widening and utility diversions or activities with similar noise levels identified in Table 9.22 in Chapter 9 (Noise & Vibration) of this EIAR). Other construction activities associated with the Proposed Scheme will be scheduled to avoid significant cumulative noise levels

NV9: The NTA will establish clear forms of communication that will involve the appointed contractor and NSLs in proximity to the works so that residents or building occupants are aware of the likely duration of activities likely to generate noise or vibration that are potentially significant as set out in Table 9.7 and Table 9.10 in Chapter 9 of this EIAR.

NV10: During the Construction Phase the appointed contractor will carry out noise monitoring at representative NSLs to evaluate and inform the requirement and / or implementation of noise management measures. Noise monitoring will be conducted in accordance with International Organization for Standardization (ISO) 1996–1 (ISO 2016) and ISO 1996–2 (ISO 2017). The selection of monitoring locations will be based on the nearest representative NSLs to the working area which will progress along the length of the Proposed Scheme.

With regard to environmental impacts for the Proposed Scheme, the Environmental Impact Assessment Report (EIAR) has assessed these impacts in each of the assessment chapters and summarised in Table 23.1: Summary of Significant Residual Impacts from the Construction and Operational Phases of the Proposed Scheme of the EIAR Volume 2 of 4 Main Report for the operational phase. It is noted that for;

- **Fauna and Flora** – this is assessed in Chapter 12 Biodiversity of the EIAR. As stated in Section 12.6.2 following the implementation of the mitigation measures the Proposed Scheme will not result in any significant residual effects during the Operational Phase.
- **Soil** – this is assessed in Chapter 14 Land Soils Geology & Hydrogeology of the EIAR. As stated in Section 14.6.2 no significant residual impacts on land, soils, geology and hydrogeology as a result of the operation of the Proposed Scheme
- **Water** – this is assessed in Chapter 13 Water of the EIAR. As stated in Section 13.6.2 no significant residual impacts have been identified in the Operational Phase of the Proposed Scheme.

- **Air** – this is assessed in Chapter 7 Air Quality of the EIAR. As stated in Section 7.6.2 no significant residual impacts have been identified during the Operational Phase of the Proposed Scheme.
- **Climate** – this is assessed in Chapter 8 Climate of the EIAR. As stated in Section 8.8.2 the Proposed Scheme will make a significant contribution to reduction in carbon emissions.
- **Landscape** – this is assessed in Chapter 17 Landscape (Townscape) & Visual of the EIAR. As noted in Section 17.6.2 the impact on No.62 and 64 Malahide Road is deemed to be moderate long term and negative.
- **Human Health** – this is assessed in Chapter 10 Population and in Appendix A10.2 of the EIAR. As noted in Section 10.6.2 the Proposed Scheme will deliver positive impacts in terms of accessibility to commercial businesses for pedestrians, cyclists and bus users during the operational phase.

v. Lack of Detail

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage your its agent / valuer in preparing, negotiating and advising on compensation. Reinstatement of property frontage including boundary walls, gates, railings, driveway, footpath and landscaping will be on a like for like basis and detailed accommodation works plans will be prepared in consultation with landowners in line with any formal agreements and in accordance with any embedded mitigations identified in the EIAR or conditions/modifications from An Bord Pleanála in relation to the Proposed Scheme application.

In relation to information relating to services, drainage, lighting, screening and planting, setback distances and boundary treatment drawings have been included in Volume 3 Figures, and summary text is provided in Chapter 4 Proposed Scheme Description of the EIAR.

- **Services** – The following drawing series provide information in relation to trunk services as provided in Volume 3 Figures in the EIAR : Combined Existing Utilities Records, Telecommunications Asset Alterations, Irish Water Asset Alterations, Gas Networks Ireland Asset Alterations, Irish Water Fowl Sewer Asset Alterations, Proposed Surface Water Drainage Works. Chapter 19 Material Assets in Volume 2 of the EIAR also provides narrative in relation to the proposed works for each of these services.
- **Drainage** – The Proposed Surface Water Drainage Works drawing series in Volume 3 Figures in the EIAR provides information in relation trunk drainage. Section 4.6.15 of Chapter 4 Proposed Scheme Description describes the approach taken for drainage. Chapter 13 Water in Volume 2 of the EIAR also provides additional information in relation to the impact of the proposed drainage works. Supplementary information is also provided in Appendix K Drainage Design Basis Document of the Preliminary Design Report.
- **Lighting**– The Street Lighting drawing series in Volume 3 Figures in the EIAR provides information in relation street lighting. Section 4.6.13 of Chapter 4 Proposed Scheme Description describes the approach taken for street lighting.
- **Screening and Planting** – The Landscaping General Arrangement drawing series in Volume 3 Figures in the EIAR provides information in relation screening and planting. Section 4.6.12 of Chapter 4 Proposed Scheme Description describes the approach taken for landscape and urban realm.
- **Boundary Treatment** - The Fencing and Boundary Treatment drawing series in Volume 3 Figures in the EIAR provides information in relation boundary treatment. Section 4.6.18.1 of Chapter 4 Proposed Scheme Description describes the approach for boundary treatment.

vi. Accommodation Works Comments

Regarding access to 62 and 64 Malahide Road, it is noted that there is presently a bus lane located outside these properties, as such the principle of how residents can access/ egress their properties is generally unchanged following implementation of the Proposed Scheme. The proposed permanent acquisition at 62 Malahide Road ranges from 0.55m to 0.65m in width and the proposed permanent

acquisition at 64 Malahide Road ranges from 0.51m to 0.55m width. This is unlikely to have a significant impact on the effective parking area in comparison to the present situation. The approximate setback distances from the footpath side of the proposed new boundary to the existing building features are provided in Figure 3.5.4.

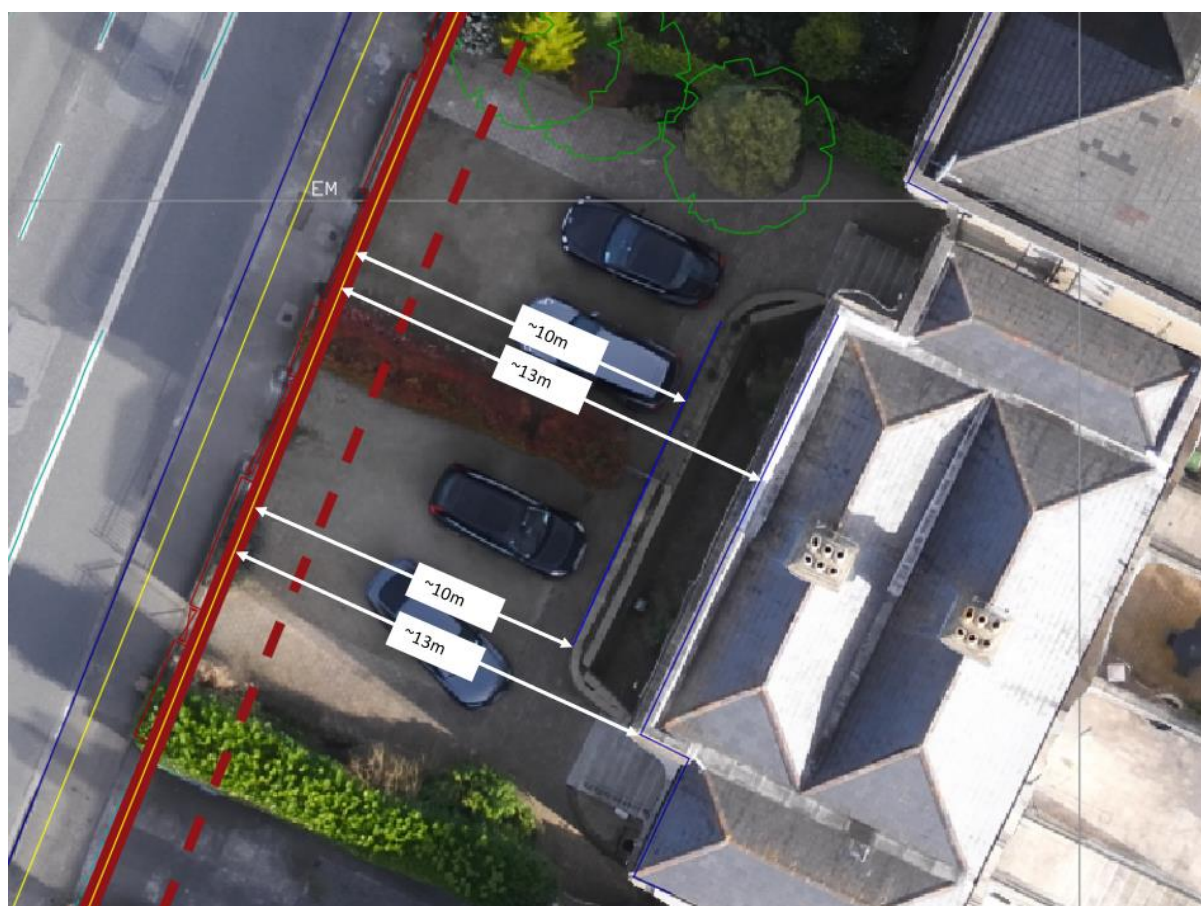


Figure 3.5.4: Proposed set back distances at Winston Ville 64 and 62 Malahide Road

As set out in Section 17.4.4.1.11 of Chapter 17 Landscape (Townscape) & Visual, the new boundary treatment will be reinstated at setback location. Overall, there would be a relatively small loss of private / garden area which will result in a partial loss of landscape amenity space, but there would be no notable change to the key characteristics of these properties.

During the course of the works, it is likely that there will be some temporary disruption / alterations, and access to premises in certain times. As described in paragraph 5.5.3.1 of Chapter 5 of Volume 2 of the EIAR, details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area. The duration of the works will vary from property to property, but access and egress will be maintained at all times.

It is noted that as a result of the Proposed Scheme the bus lane will be at between 0.51m to 0.62m closer to 62 Winston Ville and 0.62m to 0.7m closer to 62 Winston Ville compared to the existing situation.

vii. Disturbance Matters

As set out in Section 5.8.4 of Chapter 5 Construction, road closures and diversions will need to be carried out during the Construction Phase of the Proposed Scheme, however these measures will be minimised wherever possible. Where necessary, road closures and diversions will take into consideration the impact on road users, residents, businesses etc. Road closures and diversions will be carried out with regard to the Traffic Signs Manual. All road closures and diversions will be determined by the NTA, in consultation with the local authority and An Garda Síochána, as necessary. Access will be maintained for emergency vehicles along the Proposed Scheme, throughout the Construction Phase. As set out in Section 8 of Appendix A6.1 Traffic Impact Assessment, general traffic redistribution is not anticipated to be a significant issue during the construction phase, however

there will be a requirement for some localised temporary road closures for short durations of the daytime and / or night-time. Therefore, the impact on general traffic redistribution is anticipated to be a Medium Negative and temporary impact.

Similarly, as outlined in Section 5.1.6 of Appendix A5.1 Construction Environmental Management Plan (CEMP) of the EIAR, a Communications Plan in accordance with the NTA's requirements will be put in place by the contractor. This Plan will provide a mechanism for members of the public to communicate with the NTA and the appointed contractor, and for the NTA and the appointed contractor to communicate important information on various aspects of the Proposed Scheme to the public. The Plan will include procedures to inform members of the community directly affected by the Construction Phase on schedules for any activity of a particularly disruptive nature which is likely to impinge on their property such as boundary works, road closures and diversions, and any mitigating actions that are being taken to minimise such disruption.

In relation to modification of road levels, the design of the Proposed Scheme has been developed to a stage where all potential environmental impacts can be identified, and a fully informed environmental impact assessment can be carried out. The NTA (the Employer for the construction works) will set out the Employer's Requirements in the Construction Contract including all applicable mitigation measures identified in this EIAR, as well as additional measures required pursuant to conditions attached to any decision to grant approval. Procurement of the contractor will involve the determination that the appointed contractor is competent to carry out the works, including the effective implementation of the mitigation measures. The appointed contractor will be required to plan and construct the Proposed Scheme construction works in accordance with the Employer's Requirements, and the NTA will employ an Employer's Representative team with appropriate competence to administer and monitor the Construction Contract for compliance with the Employer's Requirements.

3.5.4 Responses to Individual Objection Letters

CPO-07 – Gerard and Davina Murnaghan

1. Permanent Land Acquisition

The NTA notes the objection of the permanent acquisition of land. Additional information has been provided in Section 3.5.3 i above in relation to the requirements for this land for the Proposed Scheme.

2. Temporary Land Acquisition

The NTA notes the objection of the permanent acquisition of land. Additional information has been provided in Section 3.5.3 i above in relation to the requirements for this land for the Proposed Scheme.

3. Health and Safety

The NTA notes the comments raised in relation to Health and Safety. The requirements of the Safety, Health and Welfare at Work Act 2005, the Safety, Health and Welfare at Work (Construction) Regulations, 2013 and other relevant Irish and EU safety legislation will be complied with at all times. Additional information has been provided in Section 3.5.3 ii above in relation to access arrangements to the property during the works and the NTA's approach to communicating with residents during the works.

4. Traffic Calming Measures

The NTA notes the comments raised in relation to Traffic Calming Measures. Additional information has been provided in Section 3.5.3 iii above in relation to traffic calming measures that have been implemented throughout the Proposed Scheme and within the vicinity of the property.

5. Noise

The NTA notes the comments raised in relation to Noise. Additional information has been provided in Section 3.5.3 iv above in relation to predicted noise impacts and mitigation measures that are being proposed to control the works throughout the Proposed Scheme and within the vicinity of the property.

6. Access-General

The NTA notes the objection raised in relation to Access-General. Additional information has been provided in Section 3.5.3 v and vi above in relation to future consultation with landowners subject to confirmation of the CPO by An Bord Pleanála. As noted above, access and egress will be maintained at all times during the works.

7. Access Road Details

The NTA notes the comments raised in relation to Access Road Details. Additional information has been provided in Section 3.5.3 v and vi above in relation to future consultation with landowners subject to confirmation of the CPO by An Bord Pleanála. As noted above, the principle of how residents can access/ egress their properties is generally unchanged following implementation of the Proposed Scheme.

8. Services

The NTA notes the comment raised in relation to Services. Additional information has been provided in Section 3.5.3 v above.

9. Drainage

The NTA notes the comments raised in relation to Drainage. Additional information has been provided in Section 3.5.3 v above. As noted in Section 13.4.5.1 of Chapter 13 Water in the EIAR, no potential changes to hydrology are predicted as the drainage design ensures no net increase in runoff rates during the operational phase. In terms of mitigation, a Surface Water Management Plan (SWMP) has been prepared (provided in the CEMP, Appendix A5.1 in Volume 4 of this EIAR), which details control and management measures for avoiding, preventing, or reducing any significant adverse impacts on the surface water environment during the Construction Phase of the Proposed Scheme.

10. Road Closures

The NTA notes the objection raised in relation to Road Closures. Additional information has been provided in Section 3.5.3 vii above. As set out in Section 5.8.4 of Chapter 5 Construction, road closures and diversions will need to be carried out during the Construction Phase of the Proposed Scheme, however these measures will be minimised wherever possible. As set out in Section 8 of Appendix A6.1 Traffic Impact Assessment, general traffic redistribution is not anticipated to be a significant issue during the construction phase, however there will be a requirement for some localised temporary road closures for short durations of the daytime and / or night-time. Therefore, the impact on general traffic redistribution is anticipated to be a Medium Negative and temporary impact.

11. Screening and Planting

The NTA notes the objection raised in relation to Screening and Planting. Additional information has been provided in Section 3.5.3 v above. The NTA will prepare detailed accommodation works plans in consultation with impacted landowners upon confirmation of the CPO by An Bord Pleanála. As set out in Section 17.4.4.1.11 of Chapter 17 Landscape (Townscape) & Visual, the new boundary treatment will be reinstated at setback location. Overall, there would be a relatively small loss of private / garden area which will result in a partial loss of landscape amenity space, but there would be no notable change to the key characteristics of these properties.

12. Boundary Treatment

The NTA notes the comment raised in relation to Boundary Treatment. Additional information has been provided in Section 3.5.3 v above. The NTA will prepare detailed accommodation works plans in consultation with impacted landowners upon confirmation of the CPO by An Bord Pleanála. Section 4.6.18.1 of Chapter 4 Proposed Scheme Description describes the approach for boundary treatment. To maintain the character and setting of the Proposed Scheme, the approach to undertaking the new boundary treatment works along the corridor is replacement on a 'like for like' basis in terms of

material selection and general aesthetics. Modifications to driveways and entrances will be guided by DCC's Parking Cars in Front Gardens Advisory Booklet (DCC 2011). Existing gates will be reused where possible however considerations will be required for the use of bifold gates, or other appropriate alternatives to mitigate impacts on parking in driveways. All gates will be hung such that they will open inwards onto the property, where practicable.

13. Road Levels

The NTA notes the objection raised in relation to Road Levels. Additional information has been provided in Section 3.5.3 vii above. The appointed contractor will be required to plan and construct the Proposed Scheme construction works in accordance with the Employer's Requirements as set out by the NTA, and the NTA will employ an Employer's Representative team with appropriate competence to administer and monitor the Construction Contract for compliance with the Employer's Requirements.

14. Lighting

The NTA notes the comment raised in relation to Lighting. Additional information has been provided in Section 3.5.3 v above. Section 4.6.13 of Chapter 4 Proposed Scheme Description describes the approach taken for street lighting.

15. Road Alignment

The NTA notes the objection raised in relation to Road Alignment. Additional information has been provided in Section 3.5.3 i above. As set out in Section 17.4.4.1.11 of Chapter 17 Landscape (Townscape) & Visual, the new boundary treatment will be reinstated at setback location. Overall, there would be a relatively small loss of private / garden area which will result in a partial loss of landscape amenity space, but there would be no notable change to the key characteristics of these properties.

16. Setback Distances

The NTA notes the comment raised in relation to Setback Distances. The NTA will prepare detailed accommodation works plans in consultation with impacted landowners upon confirmation of the CPO by An Bord Pleanála. Additional information and set back distances from the proposed new boundary to key house features has been provided in Section 3.5.3 vi above. The proposed permanent acquisition at 64 Malahide Road ranges from 0.51m to 0.55m width.

17. Proximity to House

The NTA notes the comment raised in relation to Proximity to House. Additional information has been provided in Section 3.5.3 vi above. The proposed permanent acquisition at 64 Malahide Road ranges from 0.51m to 0.55m width.

18. Viability and Value

The NTA notes the comments raised in relation to Viability and Value. Additional information has been provided in Section 3.5.3 i above. The proposed permanent acquisition at 64 Malahide Road ranges from 0.51m to 0.55m width.

19. Temporary Accommodation

The NTA notes the comments raised in relation to Temporary Accommodation. As reference Section 3.5.3 v above, the NTA will prepare detailed accommodation works plans in consultation with impacted landowners upon confirmation of the CPO by An Bord Pleanála. Additional information has been provided in Section 3.5.3 vii above.

20. Impact to Work

The NTA notes the comments raised in relation to Impact to Work. Additional information has been provided in Section 3.5.3 vii above. A Communications Plan will be put in place for the works. The Plan will include procedures to inform members of the community directly affected by the Construction Phase on schedules for any activity of a particularly disruptive nature which is likely to impinge on

their property such as boundary works, road closures and diversions, and any mitigating actions that are being taken to minimise such disruption.

21. Environmental Impacts

The NTA notes the comments raised in relation to Environmental Impacts. Additional information has been provided in Section 3.5.3 iv above. The Proposed Scheme has been assessed to not result in any significant residual effects during the Operational Phase.

22. Route Selection

The NTA notes the comments raised in relation to Route Selection. Additional information has been provided in Section 3.5.3 i above.

23. Legal, Design and Planning Matters

The NTA notes the comments raised in relation to Legal, Design and Planning Matters. As set out in Section 3.5.3 v above, the NTA will prepared detailed accommodation works plans in consultation with impacted landowners upon confirmation of the CPO by An Bord Pleanála.

24. Other Matters

The NTA notes the comments raised in relation to Other Matters. The NTA also notes the request for an Oral Hearing which will be a matter for An Bord Pleanála to determine.

CPO-30 – Gavin and Clara Guinane

1. Permanent Land Acquisition

The NTA notes the objection of the permanent acquisition of land. Additional information has been provided in Section 3.5.3 i above in relation to the requirements for this land for the Proposed Scheme.

2. Temporary Land Acquisition

The NTA notes the objection of the permanent acquisition of land. Additional information has been provided in Section 3.5.3 i above in relation to the requirements for this land for the Proposed Scheme.

3. Noise

The NTA notes the comments raised in relation to Noise. Additional information has been provided in Section 3.5.3 iv above in relation to predicted noise impacts and mitigation measures that are being proposed to control the works throughout the Proposed Scheme and within the vicinity of the property.

4. Traffic Calming Measures

The NTA notes the comments raised in relation to Traffic Calming Measures. Additional information has been provided in Section 3.5.3 iii above in relation to traffic calming measures that have been implemented throughout the Proposed Scheme and within the vicinity of the property.

5. Road Closures

The NTA notes the objection raised in relation to Road Closures. Additional information has been provided in Section 3.5.3 vii above. As set out in Section 5.8.4 of Chapter 5 Construction, road closures and diversions will need to be carried out during the Construction Phase of the Proposed Scheme, however these measures will be minimised wherever possible. As set out in Section 8 of Appendix A6.1 Traffic Impact Assessment, general traffic redistribution is not anticipated to be a significant issue during the construction phase, however there will be a requirement for some localised temporary road closures for short durations of the daytime and / or night-time. Therefore, the impact on general traffic redistribution is anticipated to be a Medium Negative and temporary impact.

6. Access-General

The NTA notes the objection raised in relation to Access-General. Additional information has been provided in Section 3.5.3 v and vi above in relation to future consultation with landowners subject to confirmation of the CPO by An Bord Pleanála. As noted above, access and egress will be maintained at all times during the works.

7. Access Road Details

The NTA notes the comments raised in relation to Access Road Details. Additional information has been provided in Section 3.5.3 v and vi above in relation to future consultation with landowners subject to confirmation of the CPO by An Bord Pleanála. As noted above, the principle of how residents can access/ egress their properties is generally unchanged following implementation of the Proposed Scheme.

8. Proximity to House

The NTA notes the comment raised in relation to Proximity to House. Additional information has been provided in Section 3.5.3 vi above. The proposed permanent acquisition at 62 Malahide Road ranges from 0.55m to 0.65m in width.

9. Drainage

The NTA notes the comments raised in relation to Drainage. Additional information has been provided in Section 3.5.3 v above. As noted in Section 13.4.5.1 of Chapter 13 Water in the EIAR, no potential changes to hydrology are predicted as the drainage design ensures no net increase in runoff rates during the operational phase. In terms of mitigation, a Surface Water Management Plan (SWMP) has been prepared (provided in the CEMP, Appendix A5.1 in Volume 4 of this EIAR), which details control and management measures for avoiding, preventing, or reducing any significant adverse impacts on the surface water environment during the Construction Phase of the Proposed Scheme.

10. Health and Safety

The NTA notes the comments raised in relation to Health and Safety. The requirements of the Safety, Health and Welfare at Work Act 2005, the Safety, Health and Welfare at Work (Construction) Regulations, 2013 and other relevant Irish and EU safety legislation will be complied with at all times. Additional information has been provided in Section 3.5.3 ii above in relation to access arrangements to the property during the works and the NTA's approach to communicating with residents during the works.

11. Screening and Planting

The NTA notes the objection raised in relation to Screening and Planting. Additional information has been provided in Section 3.5.3 v above. The NTA will prepare detailed accommodation works plans in consultation with impacted landowners upon confirmation of the CPO by An Bord Pleanála. As set out in Section 17.4.4.1.11 of Chapter 17 Landscape (Townscape) & Visual, the new boundary treatment will be reinstated at setback location. Overall, there would be a relatively small loss of private / garden area which will result in a partial loss of landscape amenity space, but there would be no notable change to the key characteristics of these properties.

12. Boundary Treatment

The NTA notes the comment raised in relation to Boundary Treatment. Additional information has been provided in Section 3.5.3 v above. The NTA will prepare detailed accommodation works plans in consultation with impacted landowners upon confirmation of the CPO by An Bord Pleanála. Section 4.6.18.1 of Chapter 4 Proposed Scheme Description describes the approach for boundary treatment. To maintain the character and setting of the Proposed Scheme, the approach to undertaking the new boundary treatment works along the corridor is replacement on a 'like for like' basis in terms of material selection and general aesthetics. Modifications to driveways and entrances will be guided by DCC's Parking Cars in Front Gardens Advisory Booklet (DCC 2011). Existing gates will be reused where possible however considerations will be required for the use of bifold gates, or other appropriate alternatives to mitigate impacts on parking in driveways. All gates will be hung such that they will open inwards onto the property, where practicable.

13. Road Levels

The NTA notes the objection raised in relation to Road Levels. Additional information has been provided in Section 3.5.3 vii above. The appointed contractor will be required to plan and construct the Proposed Scheme construction works in accordance with the Employer's Requirements as set out by the NTA, and the NTA will employ an Employer's Representative team with appropriate competence to administer and monitor the Construction Contract for compliance with the Employer's Requirements.

14. Lighting

The NTA notes the comment raised in relation to Lighting. Additional information has been provided in Section 3.5.3 v above. Section 4.6.13 of Chapter 4 Proposed Scheme Description describes the approach taken for street lighting.

15. Road Alignment

The NTA notes the objection raised in relation to Road Alignment. Additional information has been provided in Section 3.5.3 i above. As set out in Section 17.4.4.1.11 of Chapter 17 Landscape (Townscape) & Visual, the new boundary treatment will be reinstated at setback location. Overall, there would be a relatively small loss of private / garden area which will result in a partial loss of landscape amenity space, but there would be no notable change to the key characteristics of these properties.

16. Setback Distances

The NTA notes the comment raised in relation to Setback Distances. The NTA will prepare detailed accommodation works plans in consultation with impacted landowners upon confirmation of the CPO by An Bord Pleanála. Additional information and set back distances from the proposed new boundary to key house features has been provided in Section 3.5.3 vi above. The proposed permanent acquisition at 62 Malahide Road ranges from 0.55m to 0.65m in width.

17. Services

The NTA notes the comment raised in relation to Services. Additional information has been provided in Section 3.5.3 v above.

18. Environmental Impacts

The NTA notes the comments raised in relation to Environmental Impacts. Additional information has been provided in Section 3.5.3 iv above. The Proposed Scheme has been assessed to not result in any significant residual effects during the Operational Phase.

19. Temporary Accommodation

The NTA notes the comments raised in relation to Temporary Accommodation. As reference Section 3.5.3 v above, the NTA will prepare detailed accommodation works plans in consultation with impacted landowners upon confirmation of the CPO by An Bord Pleanála. Additional information has been provided in Section 3.5.3 vii above.

20. Impact to Work

The NTA notes the comments raised in relation to Impact to Work. Additional information has been provided in Section 3.5.3 vii above. A Communications Plan will be put in place for the works. The Plan will include procedures to inform members of the community directly affected by the Construction Phase on schedules for any activity of a particularly disruptive nature which is likely to impinge on their property such as boundary works, road closures and diversions, and any mitigating actions that are being taken to minimise such disruption

21. Viability and Value

The NTA notes the comments raised in relation to Viability and Value. Additional information has been provided in Section 3.5.3 i above. The proposed permanent acquisition at 62 Malahide Road ranges from 0.55m to 0.65m in width.

22. Route Selection

The NTA notes the comments raised in relation to Route Selection. Additional information has been provided in Section 3.5.3 i above.

23. Legal, Design and Planning Matters

The NTA notes the comments raised in relation to Legal, Design and Planning Matters. As set out in Section 3.5.3 v above, the NTA will prepared detailed accommodation works plans in consultation with impacted landowners upon confirmation of the CPO by An Bord Pleanála.

24. Other Matters

The NTA notes the comments raised in relation to Other Matters. The NTA also notes the request for an Oral Hearing which will be a matter for An Bord Pleanála to determine.

3.6 Dispersed Locations

3.6.1 6 Artane Cottages Upper – CPO-02 Alice Kenny

Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor, as described in paragraph 4.5.2.1 of Chapter 4 Proposed Scheme Description of Volume 2 of the EIAR, between Gracefield Road Junction and Killester Avenue Junction, it is intended to provide a continuous bus lane with a single general traffic lane in each direction. Dedicated cycle tracks and footpath facilities will be provided through this section, including a section of new footpath between Kilmore Road and St. David's Wood.

At this property the width of land to be acquired is approximately 1.7m in order to accommodate a new footpath thereby creating space for a new cycle track on the inbound carriageway. This will require the demolition and reconstruction the boundary wall and the relocation of the vehicular gate, with the new footpath being constructed 1.7m closer to the residence.

The relevant extract from EIAR Chapter 4 Appendix the General Arrangement drawings is shown in Figure 3.6.1, the existing aerial view is shown in Figure 3.6.2 and the existing street view is shown in Figure 3.6.3 below.

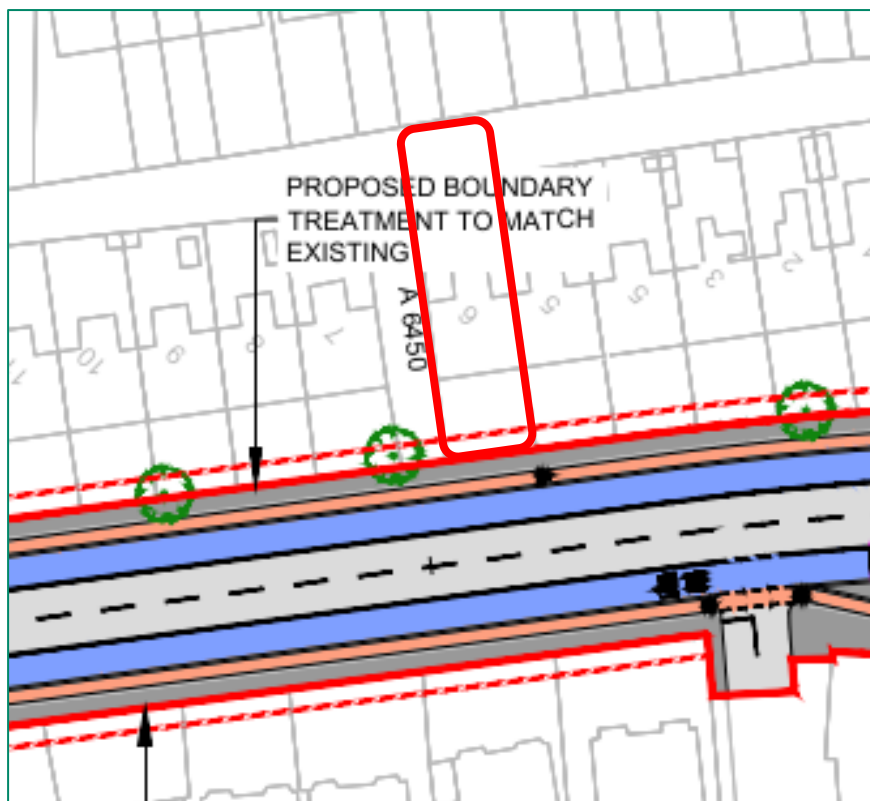


Figure 3.6.1: Proposed new Layout at 6 Artane Cottages Upper



Figure 3.6.2: Existing aerial view of 6 Artane Cottages Upper



Figure 3.6.3: Existing Street View of 6 Artane Cottages Upper (Image Source: Google)

Summary of Objections Raised

This objection is made to the CPO for 1.7 metres of the front garden of the property and raised three potential issues.

- i. Loss of Garden/Parking Space
The objection states that the loss of 1.7m of their front garden will also impact their ability to park their car at the property.
- ii. Traffic being brought closer to the residence
The objection is concerned that there will be two lanes of two lanes of traffic in each direction and two cycle lanes, bringing traffic nearer to her residence
- iii. Vibration and Noise Pollution
The objection is concerned that there will be increased noise, vibrations and pollution as a result of the traffic being closer to the residence.

Response to Objections Raised

i. Loss of Garden/Parking Space

The Permanent land acquisition is required at this location to achieve the necessary road cross section for the Proposed Scheme. It will result in the loss of approximately 0.8m width with an additional 2.0m temporarily required to allow for the construction of boundary treatment and tying into the existing garden/driveway. There will be the loss of part of the planted area on the house side of the front boundary wall.

The 10.0m wide front boundary will be at approximately 7.2m from the front of the house. This will not hinder the existing arrangement of parking for a single car.

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage its agent / valuer in preparing, negotiating and advising on compensation.

ii. Traffic being brought closer to the residence

The location of the proposed bus lane will be approximately 0.2m further away from the residence than the existing situation. The permanent acquisition of land is to allow for the construction of a 1.5m wide cycleway and 2.0m wide footpath. The general traffic lane will also be approximately 0.2m further way from the residence. As shown in Diagrams 6.27 and 6.28 of EIAR Chapter 6 Traffic and Transport the traffic has been assessed to reduce along the full length of the Proposed Scheme along Malahide Road in both the AM and PM peak hours, including the section of R107 Malahide Road between Gracefield Road and Kilmore Road which passes Artane Cottages Upper. Table 6.42 of Chapter 6 reports that for this section the 2028 AM peak hour traffic flows in Passenger Car Units (PCUs) will fall from 1,263 in the Do Minimum scenario to 1,027 in the Do Something Scenario. For the 2028 PM peak hour flow for this section is forecast to reduce by between 0-100 PCUs.

iii. Vibration, Noise and Pollution

As stated above, the location of the proposed bus lane will be approximately 0.2m further from the residence compared to the existing situation.

Section 9.5.1.2 of Chapter 9 Noise and Vibration of Volume 2 of the EIAR describes the likely vibration levels associated with construction activities, it is considered that the construction of the Proposed Scheme is not expected to give rise to vibration that is either significantly intrusive or capable of giving rise to structural or cosmetic damage to buildings. Vibration from construction activities will be limited to the values set out in Table 9.10 to avoid any form of potential cosmetic damage to buildings and structures. Monitoring will be undertaken at identified sensitive buildings, where proposed works have the potential to be at or exceed the vibration limit values in Table 9.10.- Recommended Construction Vibration Thresholds for Buildings.

In relationship to the impact of the proposed scheme on noise this has been assessed as **Imperceptible / Positive** as shown in Figures 9.2 to Figures 9.5 of Chapter 9 Noise and Vibration of Volume 3 of the EIAR, in the vicinity of Artane Cottages Upper between the monitoring locations CBC0001UNML001 and CBC0001ANML05 shown in Figure 9.2.

In relationship to the impact of the Proposed Scheme on Air Quality this has been assessed as **Negligible to Moderate Beneficial** as shown in Figures 7.1 and Figures 7.3 to 7.8 of Chapter 7 Air Quality of Volume 3 of the EIAR, in the vicinity of Artane Cottages Upper between the monitoring locations CBC0001DT005 and CBC0001DT006 shown in Figure 7.1.

3.6.2 28 Malahide Road – CPO-16 Kieran Tumulty and Danielle O’Riordan

Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor, as described in paragraph 4.5.2.1 of Chapter 4 Proposed Scheme Description of Volume 2 of the EIAR, between Griffith Avenue Junction and Clontarf Road Junction, it is proposed to continue the bus and general traffic lanes in

both directions. There are currently only three traffic lanes on this section of road. To facilitate the new four lane arrangement, land acquisition is required from adjacent properties at the following locations:

- Between Charlemont Road and Crescent Place (inbound side); and
- Between Crescent Place and Clontarf Road (outbound side).

At this property the width of land to be acquired is approximately 0.6m in order to accommodate a new footpath thereby creating space for a new cycle track on the inbound carriageway. This will require the demolition and reconstruction the boundary wall and the re-erection of existing railings, with the new footpath being constructed 0.6m closer to the residence.

The relevant extract from EIAR Chapter 4 Appendix the General Arrangement drawings is shown in Figure 3.6.4, an aerial view in Figure 3.6.5 and street view in Figure 3.6.6, below.

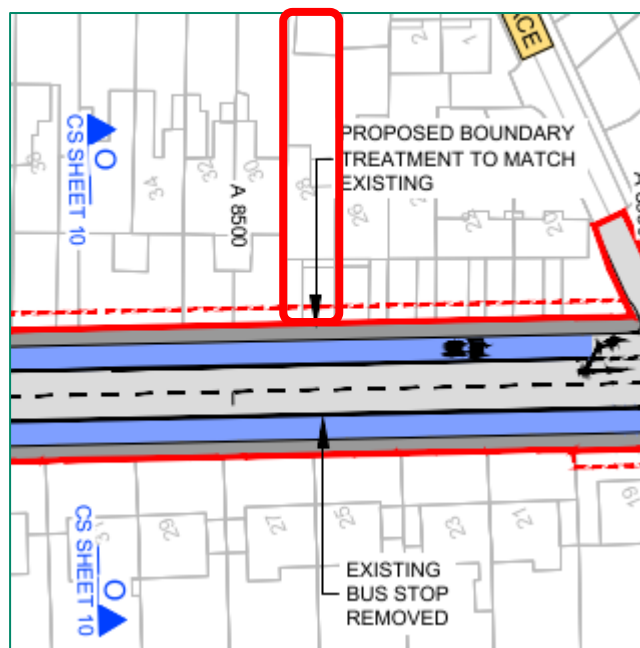


Figure 3.6.4 Proposed new Layout at 28 Malahide Road



Figure 3.6.5-Existing aerial view at 28 Malahide Road



Figure 3.6.6 Existing Street View at 28 Malahide Road (Image Source: Google)

Summary of Objections Raised

This objection is made to the CPO for part of the front garden and driveway of the property and raised five potential issues.

i. Loss of car parking spaces

The objection states that the property has space to park two vehicles, which are both used on a daily basis, and that the CPO will result in the loss of at least one and potentially both car parking spaces. It also raises concerns about the lateness of the notice that they received concerning the CPO, as well as citing concerns about deliveries and future parking of their vehicles.

ii. Noise and potential structural damage

The objection expresses concern that the bus traffic will increase outside their house with an associated increase in noise and vibration. It also raises concern about potential structural damage to the residence as traffic will be closer to the building.

iii. Loss of front garden / changes to aesthetics of front of house

The objection states that the CPO will lead to the loss of mature shrubbery providing privacy and sound proofing the front of the property, as well as the original iron railings that form part of the boundary wall, leaving the residence exposed.

iv. Inconvenience of works and temporary use of front garden

It also raises a concern about a temporary restriction to their right of access to their property, including car parking and access to a secure covered porch area.

v. Overall impact on value of property

The objection raises a concern that the CPO will have an adverse effect on the value of the property, noting that there is no other land to the rear of the property available for parking or vehicular access.

Response to Objections Raised

The following are the responses to the three issues raised.

i. Loss of car parking spaces

The Permanent acquisition will result in the loss of approximately 0.8m strip of land with an additional 2.0m temporarily required to allow for the construction of boundary treatment and tying into the existing garden/driveway.

The existing 10.0m wide front boundary will be at least 7.2m from the front of the house. This will not hinder the parking of cars as accommodated at present but there will be the loss of the planted area on the house side of the front boundary wall.

In relation to the late receipt of the CPO notice, the NTA's property title research is primarily carried out in both the Land Registry and the Registry of Deeds, both of which fall under the remit of the Property Registration Authority of Ireland (PRAI). In some instances, as was the case for this property, the NTA may become aware that a party has advised that they own the property but the PRAI have a different party registered as the owner. As soon as the NTA became aware of this, the decision was taken to include both parties in the CPO schedules. Representatives of the NTA immediately made contact with the new owners, visited the property and explained the situation and process. Following this, the required notification was duly issued, thereby providing the new owners with the opportunity to make a submission.

ii. Noise and Potential structural damage

The permanent land acquisition will result in the loss of approximately 0.6m strip of land with an additional 2.0m temporarily required to allow for the construction of boundary treatment and tying into the existing garden/driveway. The proposed new road alignment will move the bus lane about 0.5m closer to the residence.

In relation to the impact of the proposed scheme on Noise this has been assessed as Imperceptible / Positive in the vicinity of 28 Malahide Road as shown in Figures 9.2 to Figures 9.5 of Chapter 9 Noise and Vibration of Volume 3 of the EIAR. 28 Malahide Road is in close proximity to the monitoring location CBC0001ANML009 as shown in Figure 9.2 of Chapter 9 of Volume 3 of the EIAR.

Section 9.5.1.2 of Volume 2 of Chapter 9 of Volume 2 of the EIAR describes the likely vibration levels associated with construction activities, it is considered that the construction of the Proposed Scheme is not expected to give rise to vibration that is either significantly intrusive or capable of giving rise to structural or cosmetic damage to buildings. Vibration from construction activities will be limited to the values set out in Table 9.10 to avoid any form of potential cosmetic damage to buildings and structures. Monitoring will be undertaken at identified sensitive buildings, where proposed works have the potential to be at or exceed the vibration limit values in Table 9.10.-Recommended Construction Vibration Thresholds for Buildings.

iii. Loss of front garden / changes to aesthetics of front of house.

Number 28 Malahide Road has been specifically assessed in the in the EIAR (Chapter 16, Architectural Heritage). The house forms part of the mid-19th century Marino Terrace (the feature is identified as CBC0001BTH025 in the architectural heritage assessment) on Malahide Road, Dublin 3. The terrace was built c.1860. Consultation of Dublin City Development Plan 2016-2022 and draft Dublin City Development Plan 2022-2028 indicates that the terrace is not included in the Record of Protected Structures nor are they in an Architectural Conservation Area. They are not included in the published National Inventory of Architectural Heritage inventory for Dublin. However, notwithstanding that Number 28 does not have an architectural heritage designation, it is acknowledged to be of architectural heritage interest.

The architectural heritage assessment considered the factors which contribute the architectural heritage interest of the terrace including their architectural composition and craftsmanship or artistic

interest, and their contribution to the streetscape as part of a larger group of terraced buildings along the Malahide Road. They were assessed in Section 16.3.1.9 of Chapter 16 (Architectural Heritage) and in Section 2.5.2 of Appendix A16.2 Inventory of Architectural Heritage Sites in Volume 4 of the EIAR as being of Regional architectural heritage interest and Medium sensitivity for their architectural and artistic interest. It was noted that part of the original boundary treatment to Number 28, including the original gates have been previously removed to provide vehicular access.

It is acknowledged in Chapter 16 of the EIAR (Section 16.4.3.6) that there will need to be temporary land-take required from the property to allow for the removal and replacement of the existing boundary and that this land-take coupled with the removal/replacement of the boundary will result in a direct negative impact.

Under the proposed mitigation set out in Section 16.5.1.3 of Chapter 16 (Architectural Heritage) of the EIAR, the existing historic boundary treatment to Marino Terrace, numbers 24, 26 and 28 Malahide Road, consisting of the historic railings, gates and plinths or walling will be recorded by an architectural heritage specialist who will also oversee the labelling, taking-down, safe storage and reinstatement of the affected historic fabric. Works to historic fabric will be carried out in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR. The design of the new boundary treatments will be agreed in consultation with affected householders and the NTA.

With the provision of a coherent and appropriate boundary treatment to the terrace it is considered that there will be a positive impact on its coherence as a group, and on the streetscape in architectural heritage terms.

In addition, the impact on No. 28 Malahide Road is assessed in Chapter 17 (Landscape and Visual). It is acknowledged that there will be temporary land take required during the construction phase (Section 17.4.1.2) and that there will be a reduced area of private space/garden when the scheme is operational (section 17.4.1.3). The townscape / streetscape and visual effect of the Operational Phase on Number 28 is acknowledged to be Moderate / Significant, Long-Term, Negative (Table 17.11).

iv. Inconvenience of works and temporary use of front garden

It is acknowledged that during the construction of the works there will be inconveniences for all users but this will be managed to minimised impacts for all affected parties. The duration of the works will vary from property to property, but access and egress will be maintained at all times. As described in paragraph 5.5.3.1 of Chapter 5 Construction of Volume 2 of the EIAR, details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area. When roads and streets are being upgraded, there will be some temporary disruption / alterations to on-street and off-street parking provision, and access to premises in certain locations along the Proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times.

v. Overall impact on value of property

As regards the view expressed that the combined impact of all the issues raised would have an adverse and negative impact on the property value, EIAR Chapter 10 Population includes Appendix A10.2 Economic Impact of the Core Bus Corridors. Section 3 on page 14 the appendix discusses the impact of the Proposed Scheme on property prices. The conclusion reached is that in overall terms the public realm improvements planned by the NTA may lead to an increase in value of both residential and retail property prices, especially in the community centres along the corridors, with evidence showing that investing in public realm creates nicer places that are more desirable for people and business to locate in, thereby increasing the value of properties in the area.

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage your its agent / valuer in preparing, negotiating and advising on compensation.

3.6.3 The Mornington Centre - CPO-17 Cunninghams Funeral Director

Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor, as described in paragraph 4.5.2.1 of Chapter 4 Proposed Scheme Description of Volume 2 of the EIAR, between Gracefield Road Junction and Killester Avenue Junction, it is intended to provide a continuous bus lane with a single general traffic lane in each direction. Dedicated cycle tracks and footpath facilities will be provided through this section, including a section of new footpath between Kilmore Road and St. David's Wood.

The proposed scheme will require the acquisition of a strip of lane of not more than 1.8m over 8.5m width resulting in a loss of 11.8m².

The relevant extract from EIAR Chapter 4 Proposed Scheme Description Appendix the General Arrangement drawings is shown in Figure , an aerial view in Figure 3.6.8 and street view in Figure 3.6.9, below.

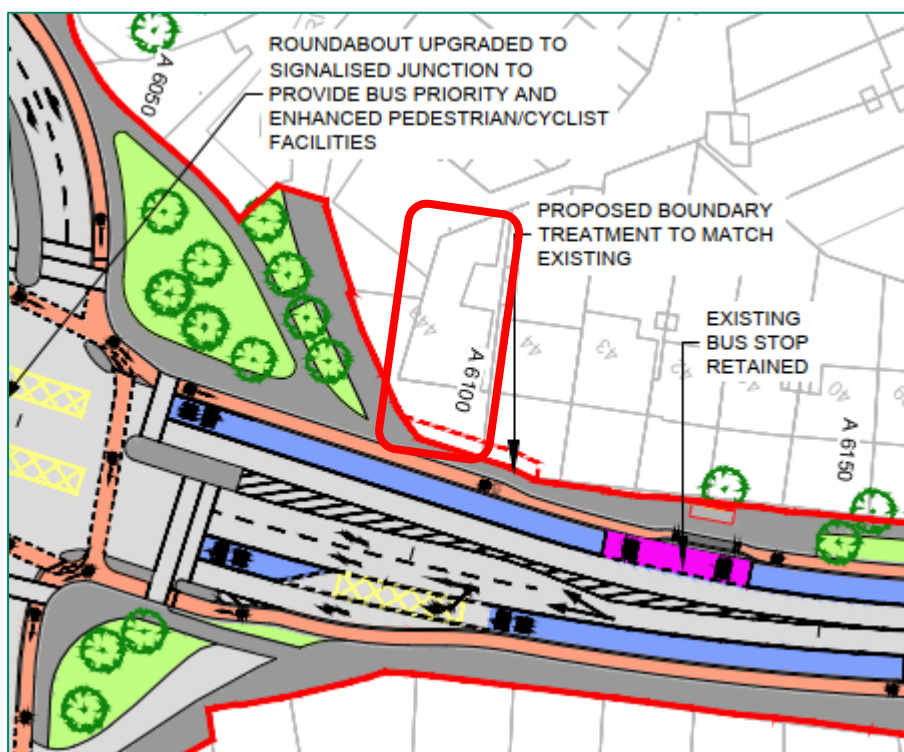


Figure 3.6.7: Proposed new Layout at The Mornington Centre



Figure 3.6.8: Existing aerial view of the Mornington Centre



Figure 3.6.9: Existing Street View of the Mornington Centre (Image Source: Google)

Summary of Objections Raised

This objection raised the following issues.

- i. Impact on Planning Permission for Funeral Home

The objection is concerned that the proposed developments will have an adverse impact on their approved planning permission for the development of a funeral home in this location. The objection expresses the view that the details of their plans for a solemn and dignified setting for a funeral home will be undermined by proposed land acquisition. The objection also expresses the belief that if the lands are acquired, *“the acquisition of such lands will prejudice and / or remove our future rights of consultation and / or objection to any future alteration, augmentation or increase of this and / or any other schemes that may be proposed”*.

Response to Objections Raised

The proposed scheme will require the acquisition of a strip of land of not more than 1.8m over 8.5m resulting in a loss of 11.8m². While it is acknowledged that there will be a loss of parking space there will remain sufficient space to park a hearse and family parking. The objection expresses the belief that if the lands are acquired, *“the acquisition of such lands will prejudice and / or remove our future rights of consultation and / or objection to any future alteration, augmentation or increase of this and / or any other schemes that may be proposed”*.

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage your its agent / valuer in preparing, negotiating and advising on compensation.

Detailed accommodation works plans will be prepared in consultation with landowners in line with any formal agreements and in accordance with any embedded mitigations identified in the EIAR or conditions/modifications from An Bord Pleanála in relation to the Proposed Scheme application.

3.6.4 210 Malahide Road – CPO-19 Caroline O’Hara

Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor, as described in paragraph 4.5.2.1 of Chapter 4 of Volume 2 of the EIAR, between Collins Avenue Junction and Griffith Avenue Junction it is intended to provide a continuous bus lane with a single general traffic lane in each direction. In addition, to facilitate continuous dedicated cycle tracks in each direction on this section of the Malahide Road, road widening will be required and therefore will involve land take on properties between Donnycarney Church and Clancarthy Road on the inbound side of Malahide Road.

At this property the width of land to be acquired is approximately 1.7m in order to accommodate a new footpath thereby creating space for a new cycle track on the inbound carriageway. This will require the demolition and reconstruction of two concrete pillars and 1 pedestrian gate, with the new footpath being constructed 1.7m closer to the residence.

The relevant extract from EIAR Chapter 4 Appendix the General Arrangement drawings are shown in Figure 3.6.10, the existing aerial view in Figure 3.6.11 and existing street view in Figure 3.6.12 below.

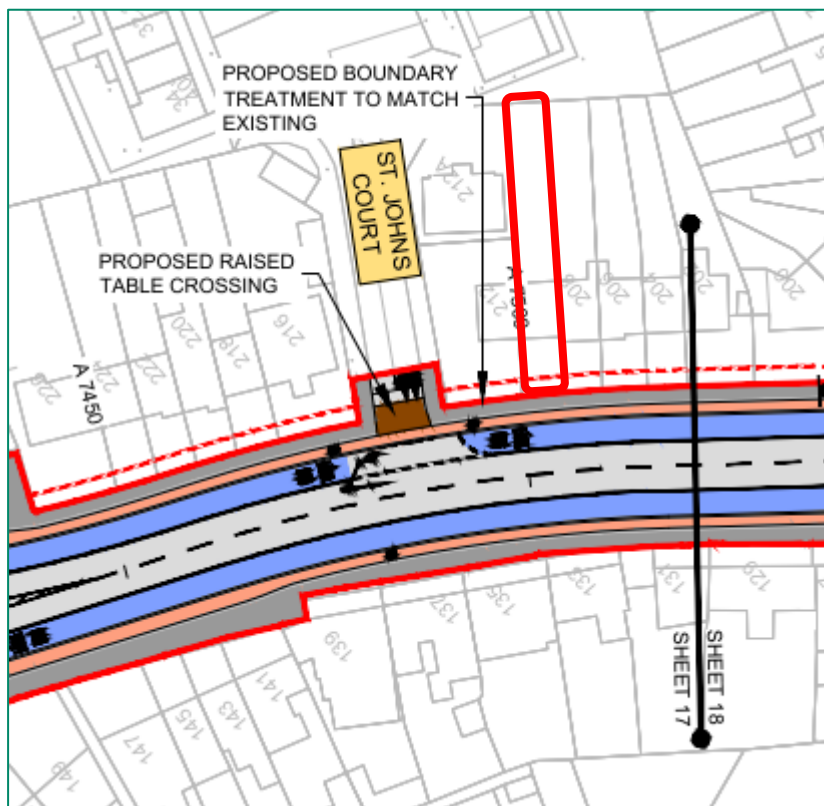


Figure 3.6.10 Proposed new Layout at 210 Malahide Road



Figure 3.6.11 Existing aerial view at 210 Malahide Road



Figure 3.6.12 Existing Street View at 210 Malahide Road (Image Source: Google)

Summary of Objections Raised

This objection to the CPO raises six potential issues.

- i. Restriction / Interference
The objection is concerned about the disruption to the access to their property during the construction of the Proposed Scheme.
- ii. Potential Damage

The objection is concerned about damage caused to their property due to construction works in close proximity to the property

iii. Loss of driveway / parking space

The objection is concerned about the loss of driveway/ parking space from the CPO required as part of the Proposed Scheme.

iv. Safety

The objection is concerned about reduced safety while accessing their property by virtue of having to cross the proposed cycle track.

v. Noise Pollution

The objection is concerned about the noise pollution increasing due to the Proposed Scheme bring traffic closer to the residence.

vi. Value of Property

The objection is concerned about the fall in value of their property as a result of the five points above.

Response to Objections Raised

The following are the responses to the six issues raised.

i. Restriction / Interference

In order to accommodate the necessary road cross section for the Proposed Scheme at this property the width of land to be acquired is approximately 1.7m and will require the demolition and reconstruction of two concrete pillars and 1 pedestrian gate, with the new footpath being constructed 1.7m closer to the residence.

It is acknowledged that during the construction of the works there will be inconveniences for all users but this will be managed to minimised impacts for all affected parties. The duration of the works will vary from property to property, but access and egress will be maintained at all times. As described in paragraph 5.5.3.1 of Chapter 5 Construction of Volume 2 of the EIAR, details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area. When roads and streets are being upgraded, there will be some temporary disruption / alterations to on-street and off-street parking provision, and access to premises in certain locations along the Proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times.

ii. Potential Damage

The proposed bus lane will be moved only 0.2m closer to residence, but a new footpath will be constructed 1.7m closer to the residence to accommodate the new cycle track. It is not envisioned that the construction of the new footpath, cycle track or bus lane will cause any damage to the residence.

Section 9.5.1.2 of Chapter 9 Noise and Vibration of Volume 2 of the EIAR describes the likely vibration levels associated with construction activities, it is considered that the construction of the Proposed Scheme is not expected to give rise to vibration that is either significantly intrusive or capable of giving rise to structural or cosmetic damage to buildings. Vibration from construction activities will be limited to the values set out in Table 9.10 to avoid any form of potential cosmetic damage to buildings and structures. Monitoring will be undertaken at identified sensitive buildings, where proposed works have the potential to be at or exceed the vibration limit values in Table 9.10.- Recommended Construction Vibration Thresholds for Buildings.

iii. Loss of driveway / parking space

The Permanent acquisition will result in the loss of approximately 1.7m with an additional 2.0m temporally required to allow for the construction of boundary treatment and tying into the existing garden/driveway.

The existing 5.3m wide road frontage boundary will be at least 6.0m from the front of the house. This will not hinder the parking of a car at this location relative to the existing arrangement.

iv. Safety

It is noted that there is an existing bus lane in operational outside the property. This is retained in the Proposed Scheme and a new cycle track is proposed between the bus lane and the new footpath. This new layout will not change the existing access arrangements. The Safety Audits undertaken for the Proposed Scheme, included as Appendix M of the Preliminary Design Report provided in the Supplementary Information did not highlight any safety issues with the proposed arrangement in this regard.

v. Noise Pollution

The provision of the new cycletrack at this location along the line of the existing footpath that vehicular traffic, in particular the bus lane will be at most approximately 0.2m closer to the residence compared to the existing situation.

The impact of the proposed scheme on Noise has been assessed as Imperceptible / Positive as shown in Figures 9.2 to Figures 9.5 of Chapter 9 of Volume 3 of the EIAR, in the vicinity of the monitoring locations CBC0001ANML06 and CBC0001ANML07 as shown in Figure 9.2 of Chapter 9 of Volume 3 of the EIAR.

vi. Value of Property

As regards the view expressed that the combined impact of all the issues raised would have an adverse and negative impact on the property value, EIAR Chapter 10 Population includes Appendix A10.2 Economic Impact of the Core Bus Corridors. Section 3 on page 14 the appendix discusses the impact of the Proposed Scheme on property prices. The conclusion reached is that in overall terms the public realm improvements planned by the NTA may lead to an increase in value of both residential and retail property prices, especially in the community centres along the corridors, with evidence showing that investing in public realm creates nicer places that are more desirable for people and business to locate in, thereby increasing the value of properties in the area.

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage your its agent / valuer in preparing, negotiating and advising on compensation.

3.6.5 The Goblet Bar and Lounge – CPO-20 Blarney Stone Public House Ltd

Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor, as described in paragraph 4.5.2.1 of Chapter 4 of Volume 2 of the EIAR, between Gracefield Road Junction and Killester Avenue Junction, it is intended to provide a continuous bus lane with a single general traffic lane in each direction. Dedicated cycle tracks and footpath facilities will be provided through this section, including a section of new footpath between Kilmore Road and St. David's Wood.

The relevant extract from EIAR Chapter 4 Appendix the General Arrangement drawings are shown in Figure 3.6.13, existing aerial view in Figure 3.6.14 and existing street view in Figure 3.6.15 below.

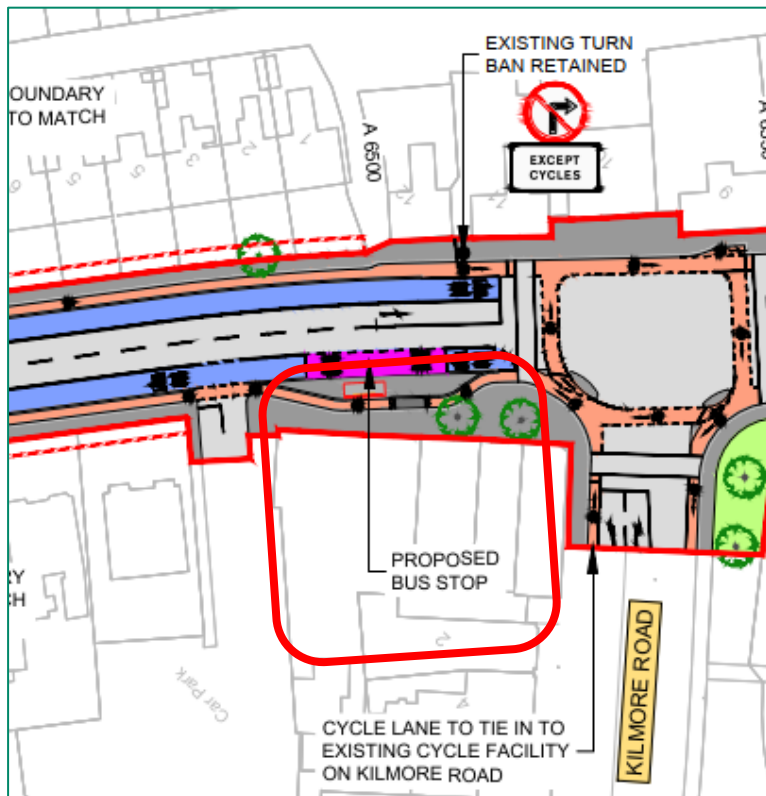


Figure 3.6.13 Proposed new Layout at the Goblet Bar and Lounge



Figure 3.6.14 Existing aerial view of the Goblet Bar and Lounge



Figure 3.6.15 Existing Street View of the Goblet Bar and Lounge (Image Source: Google)

It is also proposed to place a new bus stop at approximate chainage A6500 outside the Goblet Bar and Lounge for outbound passengers. As part of the review that was undertaken of all the bus stops along the route following the second round of non-statutory consultation, this was identified as the optimal location for a bus stop, in conjunction with the proposed new inbound bus stop outside Artane Cottages Lower on the south side of the Kilmore Road junction.

Summary of Issues Raised

This objection raised six potential issues.

i. Condition on planning permission in 1989

The objection is concerned about a previous planning permission granted in 1989 that required to keep separate the front area of their property from pedestrians. The objector is concerned that the public footpath will extend to the front face of their property.

ii. Health and Safety

The objection is concerned about health and safety due to the doors to the bar and lounge opening outwards onto the footpath, leading to a risk of injury to pedestrians and the risk of customers being struck by cyclists straying off the cycle track.

iii. Loitering at bus stop

The objection is concerned about the location of the bus stop inviting loitering in the area and in front of their property

iv. Loss of outdoor seating area

The objection is concerned about the outdoor seating being removed to accommodate works causing a loss of business

v. Carpark Access

The objection is concerned with the accommodation works during construction disrupting access to the car park.

vi. Traffic Hazards

The objection is concerned about traffic hazards being created from the location of the bus stop citing that sight lines for vehicles entering and leaving the carpark will be affected.

Response to Objections Raised

The following is the response to the seven issues raised.

i. Condition on planning permission in 1989

The proposed public footpath will extend to be adjacent to the premises. The proposed width of the footpath in front of the building varies between 2.9m to 4.1m which is greater than the 2.0m desirable minimum width for footpaths as set out in Section 4.6.1 Mainline Cross-section of the EIAR Volume 2 Chapter 4 Proposed Scheme Description. The Proposed Scheme will effectively render the condition as set out as part of the premises 1989 planning permission no longer applicable.

ii. Health and Safety

The proposed distance from building line to the proposed cycle track varies between 4.1m to 2.9m. If the doors to the premises are opened the minimum clear footpath width will be greater than 2.1m. Section 4.6.1 Mainline Cross-section of the EIAR Volume 2 Main Chapter 4 Proposed Scheme Description described that 2.0m is a desirable minimum width for footpaths with 1.2m being an absolute minimum width at pinch points. As per the normal operating procedures, of careful opening of the doors outwards, it is not anticipated that there will be any additional risk incurred by the opening of the doors as a result of the Proposed Scheme.

As described in Section 5.4 of Appendix A4.1 Preliminary Design Guidance Booklet of EIAR Chapter 4 Proposed Scheme Description, one of the core objectives of the CBC project is to provide segregated cycling facilities along the routes. Physical segregation ensures that cyclists are protected from motorised traffic as well as providing segregation from pedestrians. This latter segregation is achieved by the inclusion of a 60mm high minimum vertical kerb is required on the footpath side of the cycle track to ensure that the kerb is properly detectable by visually impaired pedestrians using the footpath. This removes the risk of errant cyclists straying on to the footpath.

iii. Loitering

The Proposed Scheme includes the provision of an Island Bus Stops outside the property. As set out in Section 11.1 of Appendix A4.1 Preliminary Design Guidance Booklet of EIAR Chapter 4 Proposed Scheme Description this is the preferred bus stop option where space constraints allow. This option will reduce conflict between cyclists and stopping buses by deflecting cyclists behind the bus stop. To address the pedestrian and cyclist conflict pedestrian priority crossings accompanied by on-call signals will be provided, with narrowing of the cycle track from 2.0m to 1.5m to prevent cyclists overtaking through the bus stop. Bus passengers are provided with a standard bus shelter will have ample space to wait for the bus on the Island between the bus stop and the cycle track, with no incentive to wait elsewhere.

iv. Loss of Business

It is noted that outdoor seating has been provided at this location in since 2021. If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage your its agent / valuer in preparing, negotiating and advising on compensation.

The impact of the loss of this seating will be reviewed as part of the landowners claim for compensation.

v. Car park access

When roads and streets are being upgraded, there will be some temporary disruption / alterations to on-street and off-street parking provision, and access to premises in certain locations along the Proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. As described in paragraph 5.5.3.1 of Chapter 5 of Volume 2 of the EIAR, details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area. The

duration of the works will vary from property to property, but access and egress will be maintained at all times.

vi. Traffic Hazards

Chapter 4 of EIAR Proposed Scheme Description provides details of how the scheme design was developed. Section 4.4 Design Principles sets out how the Preliminary Design Guidance Booklet for BusConnects Core Bus Corridors (PDGB) (NTA 2021), included as Appendix A4.1 in Volume 4 of the EIAR, was prepared to ensure that a consistent design approach for the Core Bus Corridor Infrastructure Works was adopted based on the objectives of the Proposed Scheme. The purpose of the PDGB is to complement various existing guidance documents/design standards relating to the design of urban streets, bus facilities, cycle facilities and public realm. As listed in Section 4.4 DMURS as one of the key documents for the design of urban streets, bus facilities, cycle facilities and public realm.

The design of the proposed scheme at this location complies with the visibility requirements set out in section 4.4.5 of DMURS. The Safety Audits undertaken for the Proposed Scheme, included as Appendix M of the Preliminary Design Report provided in the Supplementary Information did not highlight any safety issues with the proposed arrangement in this regard.

4. Responses to Individual Submissions on the Proposed Scheme

4.1 01 – Sherry Abraham and Bijo George (CPO-24)

4.1.1 Submission – Mornington Park

This submission objected to the proposals at Mornington Park and raised the following issues:

- i. Unsatisfactory consultation and engagement, particularly during covid – Ayrfield response
- ii. Alternative options not considered – earlier response
- iii. Loss of parking
- iv. Access/egress
- v. Air and Noise Pollution
- vi. Loss of privacy/planting /compensation

4.1.2 Response to submission

This submission is listed in Table 2.6.1 in Section 2.6.1 of this report as being one of the 13 submissions made by residents in relation to the Proposed Scheme at individual properties, a submission was also made in response to the CPO relating to the proposed acquisition of land from the front of the premises. Detailed responses to the issues raised by this submission have been provided in Section 2.6.3 of this report.

4.2 02 – Dun Laoghaire Rathdown County Council

4.2.1 Submission – Whole Scheme

The submission stated that while the Proposed Scheme falls outside the jurisdiction of Dun Laoghaire-Rathdown County Council, the Planning Authority wish to support any improvements in the Bus network in the Dublin Metropolitan Area. It also notes that Policy Objective T6 of the County plan supports the implementation of the bus network measures in the NTA's Greater Dublin Area Transport Strategy 2016-2035.

4.2.2 Response to submission

The support for the scheme is noted and welcomed by the NTA.

4.3 03 – Brendan Heneghan

4.3.1 Submission – Whole Scheme

This submission objected to whole scheme and raised the following issues:

- i. Consultation Process - Aarhus Convention / Kazakhstan Advice
- ii. Completely different scheme to that consulted on
- iii. Lack of clarity of the works proposed to be carried out
- iv. Consultation with persons on roads identified as affected by traffic report
- v. Adequacy of site notices erected
- vi. Fees charged

- vii. Technical issues
 - a. Removal of roundabouts
 - b. Removal of left turn slips
 - c. Off road cycle tracks
 - d. Trees
 - e. Construction Phasing
 - f. Bus journey times
 - g. Extents of CPO

4.3.2 Response to submission

This submission is listed in Section 2.5.1 of this report as being one of the 9 submissions made in relation the whole scheme. Detailed responses to the issues raised by this submission have been provided in Section 2.5.3 of this report.

4.4 04 – Garrett and Rena Carey

4.4.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space;
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor;

4.4.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.5 05 – Gavin and Clara Guinane (CPO-30)

4.5.1 Submission – Malahide Road

The submission raised the following issues

- i. Land Acquisition
- ii. Health and Safety
- iii. Traffic Calming Measures
- iv. Noise
- v. Access

- vi. Lack of Detail
- vii. Accommodation Works Comments
- viii. Route Selection Issues
- ix. Environmental Impacts

4.5.2 Response to submission

This submission is listed in Table 2.6.1 in Section 0 of this report as being one of the 13 submissions made by residents in relation to the Proposed Scheme at individual properties, a submission was also made in response to the CPO relating to the proposed acquisition of land from the front of the premises. Detailed responses to the issues raised by this submission have been provided in Section 0 of this report.

4.6 06 – Gerard and Davina Murnaghan (CPO-07)

4.6.1 Submission – Malahide Road

The submission raised the following issues:

- i. Land Acquisition
- ii. Health and Safety
- iii. Traffic Calming Measures
- iv. Noise
- v. Access
- vi. Lack of Detail
- vii. Accommodation Works Comments
- viii. Route Selection Issues
- ix. Environmental Impacts

4.6.2 Response to submission

This submission is listed in Table 2.6.1 in Section 0 of this report as being one of the 13 submissions made by residents in relation to the Proposed Scheme at individual properties, a submission was also made in response to the CPO relating to the proposed acquisition of land from the front of the premises. Detailed responses to the issues raised by this submission have been provided in Section 0 of this report.

4.7 07 – Noel Regazzoli (CPO-11)

4.7.1 Submission – Mornington Park

This submission objected to the proposals at Mornington Park and raised the following issues:

- i. Access to Property
- ii. Impact on air and noise

- iii. Loss of landscaping at Property
- iv. Increase in Traffic

4.7.2 Response to submission

This submission is listed in Table 2.6.1 in Section 2.6.1 of this report as being one of the 13 submissions made by residents in relation to the Proposed Scheme at individual properties, a submission was also made in response to the CPO relating to the proposed acquisition of land from the front of the premises. Detailed responses to the issues raised by this submission have been provided in Section 2.6.3 of this report.

4.8 08 – Anna Hofheinz & Others (CPO-03)

4.8.1 Submission – Artane Cottages Lower

This submission was signed on the behalf of 7 properties and it objects to the proposals at Artane Cottages Lower. It raises the following issues:

- i. Bus stop location and impact on the environment;
- ii. Residual footpath and parking/loading arrangements; and
- iii. Clarifications.

4.8.2 Response to submission

This submission is listed in Table 2.3.1 in Section 2.3.2 of this report as being one of the 4 submissions made in respect of the proposals at Artane Cottages Lower. Detailed responses to the issues raised by this submission have been provided in Section 2.3.2 of this report.

4.9 09 – Martin Baker

4.9.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space;
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor;
- Increased air and/or noise pollution; and
- Loss of privacy.

4.9.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.10 10 – Transport Infrastructure Ireland (TII)

4.10.1 Submission – Whole Scheme

The submission is a one sentence letter stating simply that Transport Infrastructure Ireland has no observations to make in relation to the Proposed Scheme.

4.10.2 Response to submission

N/A

4.11 11 – Cllr. Tom Brabazon

4.11.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space; and
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor.

4.11.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.12 12 – Mark and Shirley Rose

4.12.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Consultation undertaken;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space;
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor;
- Increased air and/or noise pollution;
- Visual impact / property value; and
- Loss of privacy.

4.12.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.13 13 – Elizabeth Keegan

4.13.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection; and
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor.

4.13.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.14 14 – Aodhán Ó Riordáin TD

4.14.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection; and
- Loss of Green / Community Space;

4.14.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.14.3 Submission – Haverty Road

This submission was in favour of the scheme and the proposals at Haverty Road. Observations were made on the following items:

- i. Traffic Speed and rat running
- ii. Pedestrian safety

- iii. Cyclist safety

4.14.4 Response to submission

This submission is listed in Table 2.2.1 in Section 2.2.2 of this report as being one of the 6 submissions made in relation to the Proposed Scheme at this location, with this particular submission being fully in favour of the scheme. Detailed responses to the points raised in this submission have been provided in Section 2.2.2 of this report.

4.14.5 Submission – Artane Cottages Lower

This submission objects to the proposals at Artane Cottages Lower. It raises the following issues:

- i. Bus stop location and impact on the environment;
- ii. Residual Footpath and parking/loading arrangements; and
- iii. Clarifications.

4.14.6 Response to submission

This submission is listed in Table 2.3.1 in Section 2.3.2 of this report as being one of the 4 submissions made in respect of the proposals at Artane Cottages Lower. Detailed responses to the issues raised by this submission have been provided in Section 2.3.2 of this report.

4.15 15 – Patrick Claffey & Others

4.15.1 Submission – Haverty Road

This submission was sent on behalf of a total of 34 residences along Haverty Road and Carleton Road and was in favour of the scheme and the proposals at Haverty Road. Observations were made on the following items:

- i. Traffic Speed and rat running
- ii. Pedestrian safety
- iii. Cyclist safety

4.15.2 Response to submission

This submission is listed in Table 2.2.1 in Section 2.2.2 of this report as being one of the 6 submissions made in relation to the Proposed Scheme at this location, with this particular submission being fully in favour of the scheme. Detailed responses to the points raised in this submission have been provided in Section 2.2.2 of this report.

4.16 16 – Michael Healy

4.16.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Consultation undertaken;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;

- Loss of Green / Community Space;
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor; and
- Increased air and/or noise pollution.

4.16.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.17 17 – Gareth Young

4.17.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Consultation undertaken;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space;
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor; and
- Increased air and/or noise pollution.

4.17.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.18 18 – Mark Byrne

4.18.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space; and
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor.

4.18.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.19 19 – Kerri McCracken

4.19.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Consultation undertaken;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space; and
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor.

4.19.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.20 20 – Eamonn Tierney

4.20.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Consultation undertaken; and
- Potential for increase in crime / anti-social behaviour / security / child safety and protection.

4.20.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.21 21 – Mandy and Tony Donnelly

4.21.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space;
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor; and
- Increased air and/or noise pollution.

4.21.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.22 22 – Paula and Declan Free

4.22.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space; and
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor.

4.22.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.23 23 – Dermot and Linda Kavanagh

4.23.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;

- Loss of Green / Community Space;
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor; and
- Increased air and/or noise pollution.

4.23.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.24 24 – Donnycarney West Community Association (DWCA)

4.24.1 Submission – Donnycarney

This submission is on behalf of the members of the DWCA and refers to the section of the Proposed Scheme shown on Sheets 16, 17 and 18 of the General Arrangement drawings and Landscape drawings.

The submission makes the following comments:

- i. Measures should be included to reduce traffic speeds along the route;
- ii. Provide sufficient crossing times and sequencing of pedestrian lights;
- iii. Disquiet about relocation of outbound bus stop 672 which is less convenient for residents of Donnycarney Road and Belton Park Road;
- iv. Concern about an area of grass and trees shown in front of 109 Malahide Road (four shops);
- v. Removal of Eir advertising unit close to junction of Donnycarney Road as it will impede pedestrians with the narrowing of the footpath;
- vi. Five flower basket poles to the front of the shops to be retained;
- vii. Support the retention of Donnycarney Clock;
- viii. Welcome the additional tree planting and request community funded feature (area sign, seating, planted areas) be retained;
- ix. Welcome the urban space in front of the church and request new public seats; and
- x. Recommend engagement with the OPW who manage the Casino Marino, including relocation of telecoms cabinet.

4.24.2 Response to submission

This submission is listed in Section 2.4.1 of this report as being one of the 3 submissions made in relation to “Other Specific Locations”. Detailed responses to the issues raised by this submission have been provided in Section 2.4.2 of this report.

4.25 25 – Kieran and Brenda Mahon

4.25.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection; and
- Loss of Green / Community Space.

4.25.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.26 26 – Roisin Harbourne

4.26.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space;
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor; and
- Increased air and/or noise pollution.

4.26.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.27 27 – Eamon Kearney

4.27.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space; and

- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor.

4.27.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.28 28 – Adrienne Murphy

4.28.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space;
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor; and
- Increased air and/or noise pollution.

4.28.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.29 29 – Martina Devlin

4.29.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space; and
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor.

4.29.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.30 30 – Bridie and Joe Corcoran

4.30.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space; and
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor.

4.30.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.31 31 – Raymond and Ursulla Butler

4.31.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space; and
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor.

4.31.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.32 32 – Lorraine and Paul Carroll

4.32.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space; and

- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor.

4.32.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.33 33 – Joe Thompson

4.33.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space;
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor; and
- Increased air and/or noise pollution.

4.33.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.34 34 – Sorcha Eivers

4.34.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space;
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor; and
- Increased air and/or noise pollution.

4.34.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.35 35 – Bernadette Clarke & Maria Clarke (CPO-04)

4.35.1 Submission – Mornington Park

This submission objected to the proposals at Mornington Park and raised the following issues:

- i. Environmental issues: Vibration, noise, air pollution and loss of planting/screening
The objections raised concerns about noise pollution, vibration and loss of privacy as a result of road traffic being closer to the residence and the removal of mature planting.
- ii. Loss of parking / access during operation and construction impact
- iii. Loss of access to wastewater and sewerage
- iv. Alternative proposal for signal controlled priority for buses

4.35.2 Response to submission

This submission is listed in Table 2.6.1 in Section 2.6.1 of this report as being one of the 13 submissions made by residents in relation to the Proposed Scheme at individual properties, a submission was also made in response to the CPO relating to the proposed acquisition of land from the front of the premises. Detailed responses to the issues raised by this submission have been provided in Section 2.6.3 of this report.

4.36 36 – Leslie & Bernadette Doyle

4.36.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space;
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor; and
- Increased air and/or noise pollution.

4.36.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.37 37 – Martin Lewis

4.37.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Consultation undertaken;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space;
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor; and
- Increased air and/or noise pollution.

4.37.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.38 38 – Ruth Moloney

4.38.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space;
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor; and
- Increased air and/or noise pollution.

4.38.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.39 39 – Allison Corrigan

4.39.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space;
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor; and

- Increased air and/or noise pollution.

4.39.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.40 40 – Brendan Rice

4.40.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space;
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor; and
- Increased air and/or noise pollution.

4.40.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.41 41 – Chiara Hughes & Alan Byrne

4.41.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space; and
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor.

4.41.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.42 42 – Cllr. Daryl Barron

4.42.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space; and
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor.

4.42.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.43 43– Dublin Commuter Coalition

4.43.1 Submission – Whole Scheme

This submission stated overall support for the Proposed Scheme and raised the following issues:

- i. Advocate for the Proposed Scheme;
- ii. Road Widths;
- iii. Enforcement;
- iv. Junction Design; and
- v. Pedestrian Crossings.

4.43.2 Response to submission

This submission is listed in Section 2.5.1 of this report as being one of the 9 submissions made in relation the whole scheme. Detailed responses to the issues raised by this submission have been provided in Section 2.5.5 of this report.

4.44 44 – Edel Carroll

4.44.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space;
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor; and

- Increased air and/or noise pollution.

4.44.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.45 45 – Eoin Lynam

4.45.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space; and
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor.

4.45.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.46 46 – Fintan & Eileen Murphy (CPO-06)

4.46.1 Submission – Maypark

The submission raised the following issues:

- i. Proximity of property to Malahide Road / Security
- ii. Access during operation

4.46.2 Response to submission

This submission is listed in Table 2.6.1 in Section 0 of this report as being one of the 13 submissions made by residents in relation to the Proposed Scheme at individual properties, a submission was also made in response to the CPO relating to the proposed acquisition of land from the front of the premises. Detailed responses to the issues raised by this submission have been provided in Section 0 of this report.

4.47 47 – Gemma & Brendan Finn

4.47.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space; and
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor.

4.47.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.48 48 – James English

4.48.1 Submission – Haverty Road

This submission was in favour of the scheme and the proposals at Haverty Road. Observations were made on the following items:

- i. Traffic Speed and rat running
- ii. Pedestrian safety
- iii. Cyclist safety

4.48.2 Response to submission

This submission is listed in Table 2.2.1 in Section 2.2.2 of this report as being one the 6 submissions made in relation to the Proposed Scheme at this location, with this particular submission being fully in favour of the scheme. Detailed responses to the points raised in this submission have been provided in Section 2.2.2 of this report.

4.49 49 – Jennifer McLaughlin

4.49.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space; and
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor.

4.49.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.50 50 – John Fannin

4.50.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space; and
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor.

4.50.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.51 51 – Ken Lynam

4.51.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space; and
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor.

4.51.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.52 52 – Liene Atrena & Konstantinos Pachoulas

4.52.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space;
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor; and
- Increased air and/or noise pollution.

4.52.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.53 53– Maria Kavanagh

4.53.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space;
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor; and
- Increased air and/or noise pollution.

4.53.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.54 54 – Niall Maher

4.54.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space;
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor; and
- Increased air and/or noise pollution.

4.54.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.55 55 – Paul Foley

4.55.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space;
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor; and
- Increased air and/or noise pollution.

4.55.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.56 56 – Tesco Ireland Limited – Avison Young

4.56.1 Submission – Clarehall

This submission makes two observations relating to:

- i. Cyclist safety; and
- ii. Highway capacity at the junction between the Malahide Road and the Clarehall Shopping Centre.

4.56.2 Response to submission

This submission is listed in Section 2.4.1 of this report as being one of the 3 submissions made in relation to “Other Specific Locations”. Detailed responses to the issues raised by this submission have been provided in Section 2.4.3 of this report.

4.57 57 – Veronica Byrne & Patrick Byrne

4.57.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Querying the consultation process;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space;
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor; and
- Increased air and/or noise pollution.

4.57.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.58 58 – Eamonn McGlinn

4.58.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space; and
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor.

4.58.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.59 59 – Dublin Cycling Campaign

4.59.1 Submission – Whole Scheme

This submission objected to whole scheme and raised the following issues:

- i. Advocate for the Proposed Scheme;
- ii. Cycling for all ages and abilities;
- iii. Existing Cycling Conditions;
- iv. Proposed Cycling Infrastructure;
- v. Requested Modifications for Safety;
 - a. Junction Design; Green Buffer Space Between Cycle Track and Road;
- vi. Requested Modifications for Comfort and Inclusion;
 - a. Shared Walking and Cycling Spaces and Crossings; and
 - b. Width of cycle track.

4.59.2 Response to submission

This submission is listed in Section 2.5.1 of this report as being one of the 9 submissions made in relation the whole scheme. Detailed responses to the issues raised by this submission have been provided in Section 0 of this report.

4.60 60 – Adrian & Ann Byrne

4.60.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space;
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor; and
- Increased air and/or noise pollution.

4.60.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.61 61 – Aidan McGovern & Christina McGovern (CPO-21)

4.61.1 Submission – Mornington Park

This submission objected to the proposals at Mornington Park and raised the following issues:

- i. Proximity of Bus Lane to residence leading to loss of privacy and air / noise pollution
- ii. Loss of parking
- iii. Traffic Hazards – access/egress

4.61.2 Response to submission

This submission is listed in Table 2.6.1 in Section 2.6.1 of this report as being one of the 13 submissions made by residents in relation to the Proposed Scheme at individual properties, a submission was also made in response to the CPO relating to the proposed acquisition of land from the front of the premises. Detailed responses to the issues raised by this submission have been provided in Section 2.6.3 of this report.

4.62 62 – Alan & Susan O'Brien

4.62.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space;
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor; and

- Increased air and/or noise pollution.

4.62.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.63 63 – Anthony Masterson

4.63.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space; and
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor.

4.63.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.64 64 – Blarney Stone Public House Ltd (CPO-20)

4.64.1 Submission – Mornington Park

This submission objected to the proposals at Mornington Park and raised the following issues:

- i. Condition on planning permission in 1989
- ii. Health and Safety
- iii. Loitering at bus stop
- iv. Loss of outdoor seating area
- v. Carpark Access
- vi. Traffic Hazards

4.64.2 Response to submission

This submission is listed in Table 2.6.1 in Section 2.6.1 of this report as being one of the 13 submissions made by residents in relation to the Proposed Scheme at individual properties, a submission was also made in response to the CPO relating to the proposed acquisition of land from the front of the premises. Detailed responses to the issues raised by this submission have been provided in Section 2.6.3 of this report.

4.65 65 – Caroline O’Hara (CPO-19)

4.65.1 Submission – Malahide Road

The submission raised the following issues:

- i. Restriction / Interference
- ii. Potential Damage
- iii. Loss of driveway / parking space
- iv. Safety
- v. Noise Pollution
- vi. Value of Property

4.65.2 Response to submission

This submission is listed in Table 2.6.1 in Section 2.6.1 of this report as being one of the 13 submissions made by residents in relation to the Proposed Scheme at individual properties, a submission was also made in response to the CPO relating to the proposed acquisition of land from the front of the premises. Detailed responses to the issues raised by this submission have been provided in Section 2.6.5 of this report.

4.66 66 – Cian O’Callaghan TD

4.66.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Consultation undertaken;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space;
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor; and
- Increased air and/or noise pollution.

4.66.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.66.3 Submission – Artane Cottages Lower

This submission objects to the proposals at Artane Cottages Lower. It raises the following issues:

- i. Bus stop location and impact on the environment;
- ii. Residual Footpath and parking/loading arrangements; and
- iii. Clarifications.

4.66.4 Response to submission

This submission is listed in Table 2.3.1 in Section 2.3.2 of this report as being one of the 4 submissions made in respect of the proposals at Artane Cottages Lower. Detailed responses to the issues raised by this submission have been provided in Section 2.3.2 of this report.

4.67 67 – Cllr. Tom Brabazon

4.67.1 Submission

This submission is identical to Submission 11. An overview of the submission and the response is detailed in Section 4.11

4.68 68 – David Clarke & Lisa Clarke (CPO-23)

4.68.1 Submission – Maypark

The submission raised the following issues:

- i. Access during operation
- ii. Noise and access during construction
- iii. Loss of Parking
- iv. Noise Impacts
- v. Landscape Impacts

4.68.2 Response to submission

This submission is listed in Table 2.6.1 in Section 0 of this report as being one of the 13 submissions made by residents in relation to the Proposed Scheme at individual properties, a submission was also made in response to the CPO relating to the proposed acquisition of land from the front of the premises. Detailed responses to the issues raised by this submission have been provided in Section 0 of this report.

4.69 69 – Deborah Byrne

4.69.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Consultation undertaken;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space;
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor; and
- Increased air and/or noise pollution.

4.69.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.70 70 – Denise Mitchell TD & Others

4.70.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space; and
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor.

4.70.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.70.3 Submission – Buttercup Park

This submission objects to the use of the green area in Darndale at the corner of Priorswood Road and Malahide Road as a temporary construction compound.

4.70.4 Response to submission

This submission is listed in Section 2.4.1 of this report as being one of the 3 submissions made in relation to “Other Specific Locations”. Detailed responses to the issues raised by this submission have been provided in Section 2.4.4 of this report.

4.71 71 – Development Applications Unit

4.71.1 Submission – Whole Scheme

This submission outlines the heritage related observations/recommendations under the heading of Nature Conservation.

4.71.2 Response to submission

This submission is listed in Section 2.5.1 of this report as being one of the 9 submissions made in relation the whole scheme. Detailed responses to the issues raised by this submission have been provided in Section 2.5.7 of this report.

4.72 72 – Eva Gahan

4.72.1 Submission – Haverty Road

This submission was in favour of the scheme and the proposals at Haverty Road. Observations were made on the following items:

- i. Traffic Speed and rat running
- ii. Pedestrian safety
- iii. Cyclist safety

4.72.2 Response to submission

This submission is listed in Table 2.2.1 in Section 2.2.2 of this report as being one of the 6 submissions made in relation to the Proposed Scheme at this location, with this particular submission being fully in favour of the scheme. Detailed responses to the points raised in this submission have been provided in Section 2.2.2 of this report.

4.73 73 – Inland Fisheries Ireland (Dublin)

4.73.1 Submission – Whole Scheme

This submission outlines observations and recommendations related to fisheries which the Proposed Scheme will interact with.

4.73.2 Response to submission

This submission is listed in Section 2.5.1 of this report as being one of the 9 submissions made in relation to the whole scheme. Detailed responses to the issues raised by this submission have been provided in Section 2.5.8 of this report.

4.74 74 – Irish Water

4.74.1 Submission – Whole Scheme

This submission outlines observations/recommendations related to Irish Water assets.

4.74.2 Response to submission

This submission is listed in Section 2.5.1 of this report as being one of the 9 submissions made in relation to the whole scheme. Detailed responses to the issues raised by this submission have been provided in Section 2.5.9 of this report.

4.75 75 – Jacqueline & Anthony Grant (CPO-18)

4.75.1 Submission – Maypark

The submission raised the following issues:

- i. Access during operation
- ii. Noise and access during construction

- iii. Loss of Parking
- iv. Noise Impacts
- v. Landscape Impacts

4.75.2 Response to submission

This submission is listed in Table 2.6.1 in Section 0 of this report as being one of the 13 submissions made by residents in relation to the Proposed Scheme at individual properties, a submission was also made in response to the CPO relating to the proposed acquisition of land from the front of the premises. Detailed responses to the issues raised by this submission have been provided in Section 0 of this report.

4.76 76 – Kieran Tumulty & Danielle O’Riordan (CPO-16)

4.76.1 Submission – Malahide Road

The submission raised the following issues:

- i. Loss of car parking spaces
- ii. Noise and potential structural damage
- iii. Loss of front garden / changes to aesthetics of front of house
- iv. Inconvenience of works and temporary use of front garden
- v. Overall impact on value of property

4.76.2 Response to submission

This submission is listed in Table 2.6.1 in Section 2.6.1 of this report as being one of the 13 submissions made by residents in relation to the Proposed Scheme at individual properties, a submission was also made in response to the CPO relating to the proposed acquisition of land from the front of the premises. Detailed responses to the issues raised by this submission have been provided in Section 2.6.5 of this report.

4.77 77 – Linda & Christopher Hamilton

4.77.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection; and
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor.

4.77.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.78 78 – Margaret Quinn

4.78.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space; and
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor.

4.78.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.79 79 – Patricia Normanly & Patrick Claffey

4.79.1 Submission – Haverty Road

This submission was in favour of the scheme and the proposals at Haverty Road. Observations were made on the following items:

- i. Traffic Speed and rat running
- ii. Pedestrian safety
- iii. Cyclist safety

4.79.2 Response to submission

This submission is listed in Table 2.2.1 in Section 2.2.2 of this report as being one the 6 submissions made in relation to the Proposed Scheme at this location, with this particular submission being fully in favour of the scheme. Detailed responses to the points raised in this submission have been provided in Section 2.2.2 of this report.

4.80 80 – Patrick Carey & Others

4.80.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;

- Loss of Green / Community Space; and
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor.

4.80.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.81 81 – Ruth Penny & Others

4.81.1 Submission – Haverty Road

This submission objects to the closure of Haverty Road and raised the following 2 issues:

- i. Inadequacy of the Site Notice and Consultation
- ii. Impact on Residents / others and Unforeseen consequences

4.81.2 Response to submission

This submission is listed in Table 2.2.1 in Section 2.2.2 of this report as being one of the 6 submissions made in relation to the Proposed Scheme at this location, with this particular submission being the only one objecting to the scheme. Detailed responses to the points raised in this submission have been provided in Section 2.2.2 of this report.

4.82 82 – Sean Haughey TD (Residents from Ard Na Greine)

4.82.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space;
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor; and
- Increased air and/or noise pollution.

4.82.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.83 83 – Sean Haughey TD (Residents from Artane Cottages Lower)

4.83.1 Submission – Artane Cottages Lower

This submission objects to the proposals at Artane Cottages Lower. It raises the following issues:

- i. Bus stop location and impact on the environment;
- ii. Residual Footpath and parking/loading arrangements; and
- iii. Clarifications.

4.83.2 Response to submission

This submission is listed in Table 2.3.1 in Section 2.3.2 of this report as being one of the 4 submissions made in respect of the proposals at Artane Cottages Lower. Detailed responses to the issues raised by this submission have been provided in Section 2.3.2 of this report.

4.84 84 – Stephen Flanagan & Others (CPO-22)

4.84.1 Submission – Malahide Road

The submission raised the following issues:

- i. Access / egress
- ii. Health and Safety
- iii. Proximity of building to Proposed Scheme / Safety -
- iv. Air Quality
- v. Noise Pollution
- vi. Value of winston

4.84.2 Response to submission

This submission is listed in Table 2.6.1 in Section 2.6.1 of this report as being one of the 13 submissions made by residents in relation to the Proposed Scheme at individual properties, a submission was also made in response to the CPO relating to the proposed acquisition of land from the front of the premises. Detailed responses to the issues raised by this submission have been provided in Section 2.6.3 of this report.

4.85 85 – Peg Connolly

4.85.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space; and

- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor.

4.85.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.86 86 – Dan and Marie Carolan

4.86.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space;
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor; and
- Increased air and/or noise pollution.

4.86.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.87 87 – James Kelly

4.87.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space;
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor; and
- Increased air and/or noise pollution.

4.87.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.88 88 – Ian and Louise O Shaughnessy

4.88.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space;
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor; and
- Increased air and/or noise pollution.

4.88.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.89 89 – Patrick Gaffney

4.89.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space; and
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor.

4.89.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.90 90 – Freddie Poole

4.90.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;

- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space; and
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor.

4.90.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.91 91 – Robert Byrne

4.91.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space; and
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor.

4.91.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.92 92 – Bernie Grant

4.92.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection; and
- Loss of Green / Community Space.

4.92.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.93 93 – Anita Cullen

4.93.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection; and
- Loss of Green / Community Space.

4.93.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.94 94 – Elizabeth D’Arcy

4.94.1 Submission – Ayrfield Drive

This submission objects to the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. It raises the following issues:

- Need for new link;
- Potential for increase in crime / anti-social behaviour / security / child safety and protection;
- Loss of Green / Community Space;
- Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor; and
- Increased air and/or noise pollution.

4.94.2 Response to submission

This submission is listed in Table 2.1.1 in Section 2.1.3 of this report as being one of the 64 submissions made in respect of the proposed new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road. Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.95 95 – Dublin City Council

4.95.1 Submission – Whole Scheme

Dublin City Council’s (DCC) submission comprises a number of observations and clarifications under the following numbered topics:

2.1 Relevant Planning History

2.2 Policy Context

2.3 Departmental Reports, including reference to the Appendix

2.4 Planning Assessment

2.6 Conclusion

Appendix

4.95.2 Response to submission

This submission is listed in Section 2.5.1 of this report as being one of the 9 submissions made in relation the whole scheme. Detailed responses to the issues raised by this submission have been provided in Section 2.5.10 of this report.