



Blanchardstown to City Centre Core Bus Corridor Scheme

NTA Observations on the Proposed Scheme Submissions and CPO Objections

January 2023

**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:

- i. *the application under Section 51 of the Roads Act 1993, as amended, for approval of the Blanchardstown to City Centre Core Bus Corridor Scheme (“the Proposed Scheme”); and*
- ii. *the Blanchardstown 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. It is noted that there is a degree of overlap between many of the issues raised in submissions on the Proposed Scheme.

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 157 submissions and objections were received by the Board; 125 submissions in response to the Proposed Scheme and 32 objections to the associated CPO.

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

The 125 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 125 submissions, 85 related to single locations, 31 related to more than one location and 9 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	Mulhuddart / Blanchardstown	2	Slip lanes at junctions, provision of additional cycle lanes
2	Navan Road	37	Various
3	Old Cabra Road	25	Impact of Old Cabra Road Bus Gates, air quality and noise pollution and safety
4	Phibsborough and adjacent streets	65	Various
5	Stoneybatter and adjacent streets	17	Various
6	Mill Road	4	Pedestrian ramp boundary wall
7	Castleknock Manor	3	Quiet street treatment

	Location	No. of submissions on the Proposed Scheme referencing this location	Key issues raised
8	Castleknock Road / Blackhorse Avenue junction	10	Impacts of the restriction of / interference with the existing Right of Way
9	Whole Scheme	9	Various

Of the 32 objections to the CPO, 10 of these objections were the same as submissions made in response to the Proposed Scheme. The remaining 22 objections were 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 the location	Key issues raised
Blanchardstown Shopping Centre	1	Support for scheme, agreement for lease
Navan Road	23	Various
Herbert Road	1	Disruption to property, noise, safety and out of date mapping
Belleville, Blackhorse Avenue	2	Various
Phoenix industrial estate	1	Access and egress to industrial estate
Fairhaven Walk, Castleknock Road	1	Permanent CPO
Phoenix Park Residential Development	2	Various
Park Centre, Prussia Street	1	Impact on Prussia Street, Manor Street and Stoneybatter

Table 1.2.3: Location referred to by each objection to the CPO (by ABP Reference Number)

CPO Ref No.	Location	CPO Ref No.	Location	CPO Ref No.	Location
1	Blanchardstown Shopping Centre	12	22 Belleville, Blackhorse Avenue	23	116 Navan Road
2	R147 Navan Road (Circle K Service Station)	13	387 Navan Road	24	139 Navan Road
3	349 Navan Road	14	Phoenix Industrial Estate (Unit 5)	25	Phoenix Park Racecourse
4	291 Navan Road	15	Belville Apartments, Blackhorse Avenue	26	Aras Slainte, Navan Road
5	199 Navan Road	16	309 Navan Road	27	269 Navan Road
6	383 Navan Road	17	267 Navan Road	28	271 Navan Road
7	114 Navan Road	18	309 Navan Road	29	Tesco, Park Shopping Centre, Prussia Street
8	305 Navan Road	19	265 Navan Road	30	Apartment 30, Millrace Road, Phoenix Park Racecourse
9	1 & 3 Herbert Road (Mill Road)	20	313 Navan Road	31	137 Navan Road
10	287 Navan Road	21	149 Navan Road	32	151 Navan Road
11	200 Navan Road	22	9 Fairhaven Walk, Castleknock Road		

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	Navan Road	33	Whole Scheme	65	Stoneybatter and adjacent streets	97	Phibsborough and adjacent streets & Old Cabra Road
2	Phibsborough and adjacent streets	34	Phibsborough and adjacent streets	66	Mill Road	98	Stoneybatter and adjacent streets & Phibsborough and adjacent streets
3	Stoneybatter and adjacent streets	35	Phibsborough and adjacent streets	67	Various	99	Phibsborough and adjacent streets
4	Phibsborough and adjacent streets	36	Various	68	Various	100	Phibsborough and adjacent streets
5	Phibsborough and adjacent streets	37	Navan Road	69	Phibsborough and adjacent streets	101	Navan Road
6	Phibsborough and adjacent streets	38	Phibsborough and adjacent streets & Old Cabra Road	70	Phibsborough and adjacent streets	102	Navan Road & Old Cabra Road
7	Phibsborough and adjacent streets	39	Phibsborough and adjacent streets & Stoneybatter and adjacent streets	71	Phibsborough and adjacent streets	103	Navan Road
8	Phibsborough and adjacent streets	40	Navan Road & Old Cabra Road Area	72	Phibsborough and adjacent streets	104	Phibsborough and adjacent streets
9	Phibsborough and adjacent streets	41	Phibsborough and adjacent streets	73	Phibsborough and adjacent streets	105	Phibsborough and adjacent streets
10	Phibsborough and adjacent streets	42	Various	74	Phibsborough and adjacent streets	106	Phibsborough and adjacent streets
11	Various	43	Old Cabra Road & Phibsborough and adjacent streets	75	Phibsborough and adjacent streets	107	Phibsborough and adjacent streets
12	Phibsborough and adjacent streets & Stoneybatter and adjacent streets	44	Phibsborough and adjacent streets & Old Cabra Road	76	Phibsborough and adjacent streets	108	Navan Road
13	Phibsborough and adjacent streets & Stoneybatter and adjacent streets	45	Navan Road	77	Phibsborough and adjacent streets	109	Stoneybatter and adjacent streets
14	Phibsborough and adjacent streets	46	Phibsborough and adjacent streets	78	Phibsborough and adjacent streets	110	Phibsborough and adjacent streets

15	Phibsborough and adjacent streets	47	Phibsborough and adjacent streets	79	Various	111	Navan Road
16	Navan Road	48	Phibsborough and adjacent streets	80	Navan Road & Old Cabra Road	112	Whole Scheme
17	Phibsborough and adjacent streets	49	Phibsborough and adjacent streets	81	Whole Scheme	113	Navan Road & Old Cabra Road
18	Old Cabra Road & Phibsborough and adjacent streets	50	Navan Road	82	Navan Road	114	Navan Road & Old Cabra Road
19	Mulhuddart / Blanchardstown & Castleknock Manor	51	Phibsborough and adjacent streets	83	Various	115	Castleknock Road / Blackhorse Avenue Junction
20	Stoneybatter and adjacent streets	52	Phibsborough and adjacent streets & Old Cabra Road	84	Phibsborough and adjacent streets	116	Phibsborough and adjacent streets
21	Phibsborough and adjacent streets	53	Phibsborough and adjacent streets	85	Stoneybatter and adjacent streets	117	Stoneybatter and adjacent streets
22	Phibsborough and adjacent streets	54	Navan Road	86	Castleknock Road / Blackhorse Avenue Junction & Navan Road	118	Stoneybatter and adjacent streets
23	Various	55	Navan Road	87	Navan Road	119	Various
24	Castleknock Road / Blackhorse Avenue Junction	56	Mill Road	88	Old Cabra Road	120	Phibsborough and adjacent streets & Stoneybatter and adjacent streets
25	Whole Scheme	57	Old Cabra Road	89	Various	121	Phibsborough and adjacent streets
26	Stoneybatter and adjacent streets	58	Phibsborough and adjacent streets	90	Various	122	Stoneybatter and adjacent streets
27	Phibsborough and adjacent streets	59	Phibsborough and adjacent streets	91	Navan Road	123	Navan Road
28	Navan Road	60	Navan Road	92	Phibsborough and adjacent streets	124	Whole Scheme
29	Whole Scheme	61	Old Cabra Road	93	Various	125	Whole Scheme
30	Whole Scheme	62	Old Cabra Road	94	Phibsborough and adjacent streets		
31	Whole Scheme	63	Phibsborough and adjacent streets	95	Phibsborough and adjacent streets		
32	Navan Road	64	Phibsborough and adjacent streets	96	Various		

2. Response to Submissions on Proposed Scheme

2.1 Proposed Scheme at Mulhuddart / Blanchardstown

2.1.1 Description of Proposed Scheme at this location

As stated in section 4.5.1.1 of Chapter 4 Proposed Scheme Description of Volume 2 of the EIAR:

The Proposed Scheme will commence at Junction 3 (Blanchardstown / Mulhuddart) eastbound off-slip from the N3. It is proposed to alter the existing off-slip road from the N3, from two general traffic lanes to one general traffic lane and one bus lane. At the junction of Blanchardstown Road North / Old Navan Road, it is proposed to introduce a protected style junction to enhance safety for cyclists. Proposals for the N3 on-slip junction, immediately to the south of this junction, include for the provision of a left turn filter lane with the northbound cycle track being moved to alongside the verge.

In the vicinity of the N3 overbridge, cycle tracks will be relocated alongside footpaths, which cross adjacent to pedestrian crossings at slip-roads to avoid conflict with vehicular traffic.

After crossing the N3 overbridge, the Proposed Scheme will provide a westbound bus lane alongside a general traffic lane along Blanchardstown Road South towards the Blanchardstown Shopping Centre via the Blakestown Way junction. Two eastbound general traffic lanes will also be provided along Blanchardstown Road South. A cycle track will be provided along each side of Blanchardstown Road South. A new retaining wall will be required between the cycle track / footpath and the shopping centre, extending from the westbound bus stop to the N3 off-slip junction and further south towards the Crowne Plaza hotel. The existing small retaining wall and railing between Whitestown Grove and Blanchardstown Road South will be replaced due to a reduction in footpath levels. The new wall and railing will match existing. A new bus layover 'layby' and driver welfare facility will be located north of the shopping centre on Blanchardstown Road South.

A new access, in the form of a signalised junction, will be provided from Blanchardstown Road South into the northern car park at Blanchardstown Shopping Centre.

The Blanchardstown Road South / Blakestown Way junction will be converted from a roundabout to a signal-controlled junction. The proposals for the road linking the Blanchardstown Road South / Blakestown Way junction to the western junction of the Bus Interchange include a bus lane and general traffic lane in each direction, with an additional left turn filter lane into the shopping centre. A single cycle track along the eastern side of this road becomes a two-way cycle track on the approach to the shopping centre. The area adjacent to the western junction of the Bus Interchange will facilitate 35 bicycle stands.

The existing roundabouts in the vicinity of the Blanchardstown Shopping Centre will be converted to signalised junctions.

Within the Blanchardstown Shopping Centre site, the existing bus laydown will be upgraded to a more formal Bus Interchange with improved passenger waiting facilities. The new Bus Interchange will include six bays for boarding / alighting and an additional seven alighting bays for buses. The interchange will also include six bus shelters with roof canopies of two different heights providing shelter for external circulation.

An existing entrance into the northern car park at the Shopping Centre will be removed as a result of the proposed Bus Interchange.

A two-way cycle track is proposed and will continue along the southern side of the new Bus Interchange.

The existing northbound bus lane on the northern corner of Blanchardstown Shopping Centre site (adjacent to the Crowne Plaza Hotel) will be maintained. This will merge with a new northbound bus lane on the N3 off-slip leading to Blanchardstown Road South. The Proposed Scheme will also provide a two-way cycle track adjacent to the northbound bus lane.

A new bus stop for inter-urban buses will be provided on the Northbound N3 off-slip adjacent to the Crowne Plaza Hotel.

Between the junction adjacent to the Crowne Plaza Hotel entrance and the Liberty Insurance building, a bus lane and general traffic lane will be provided in each direction with a two-way cycle track along the southern edge of the carriageway. Retaining walls are required between the southern footpath and the adjacent car park between chainage A200 and A400 approximately as indicated in the General Arrangement Drawings BCIDC-ARP-GEO_GA-0005_XX_00-DR-CR-9001 in Volume 3 of this EIAR. New bus stops will be provided in each direction in this area, including modification of an existing bus stop layby to accommodate inter-urban buses.

The existing roundabout junction adjacent to the Liberty Insurance Building on the L3020 will be modified to a fully signalised crossroads junction, allowing for bus lanes in both directions each side of this junction. The road between the existing junction and the tie-in with the Snugborough Interchange Upgrade scheme will be widened to accommodate improved cycling, pedestrian and bus stop facilities. A new bus layby (for inter-urban buses) will be provided on the westbound carriageway on the L3020, which will require a short section of retaining wall to be constructed to the rear of the proposed cycle track at this location.

Following this Section, it is intended to route the bus lane through the Snugborough Road junction. The Proposed Scheme will be coordinated with the Snugborough Interchange Upgrade scheme which is currently being undertaken by Fingal County Council (FCC).

The Snugborough Interchange Upgrade scheme involves the widening of the Snugborough Road bridge and the L3020 to accommodate additional bus lanes and general traffic lanes, and new cycle tracks.

The scheme proposals include for five proposed bus stops with four existing bus stops to be retained and four existing bus stops to be removed along this section of the route. This does not include for the existing bus stops at the location of the proposed Bus Interchange. There is also one existing bus stop layby to be retained and one proposed bus stop layby for inter-urban buses.

Extracts from General Arrangement Drawings which are provided as an appendix to Chapter 4 in Volume 3 of the EIAR are included in Figure 2.1.1 to Figure 2.1.6.

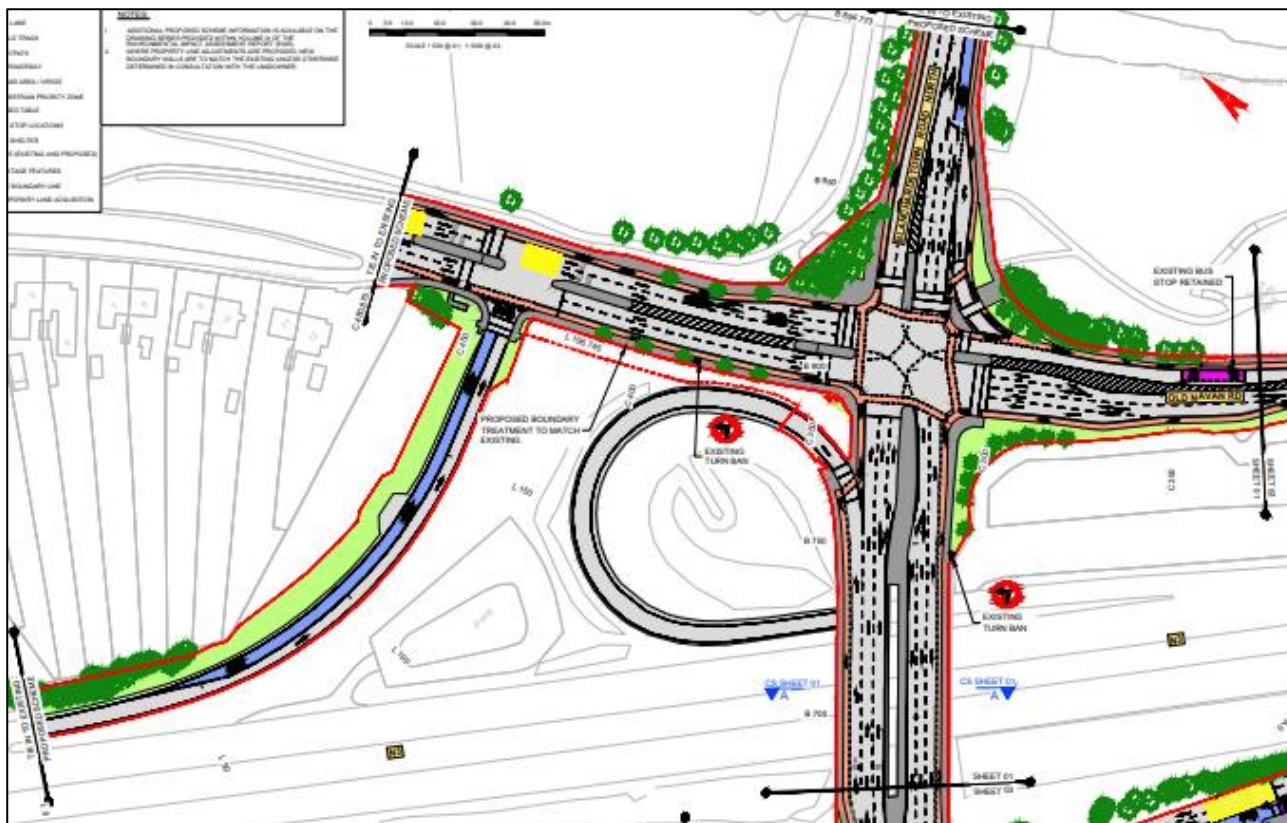


Figure 2.1.1: Extract 1 from General Arrangement Drawing

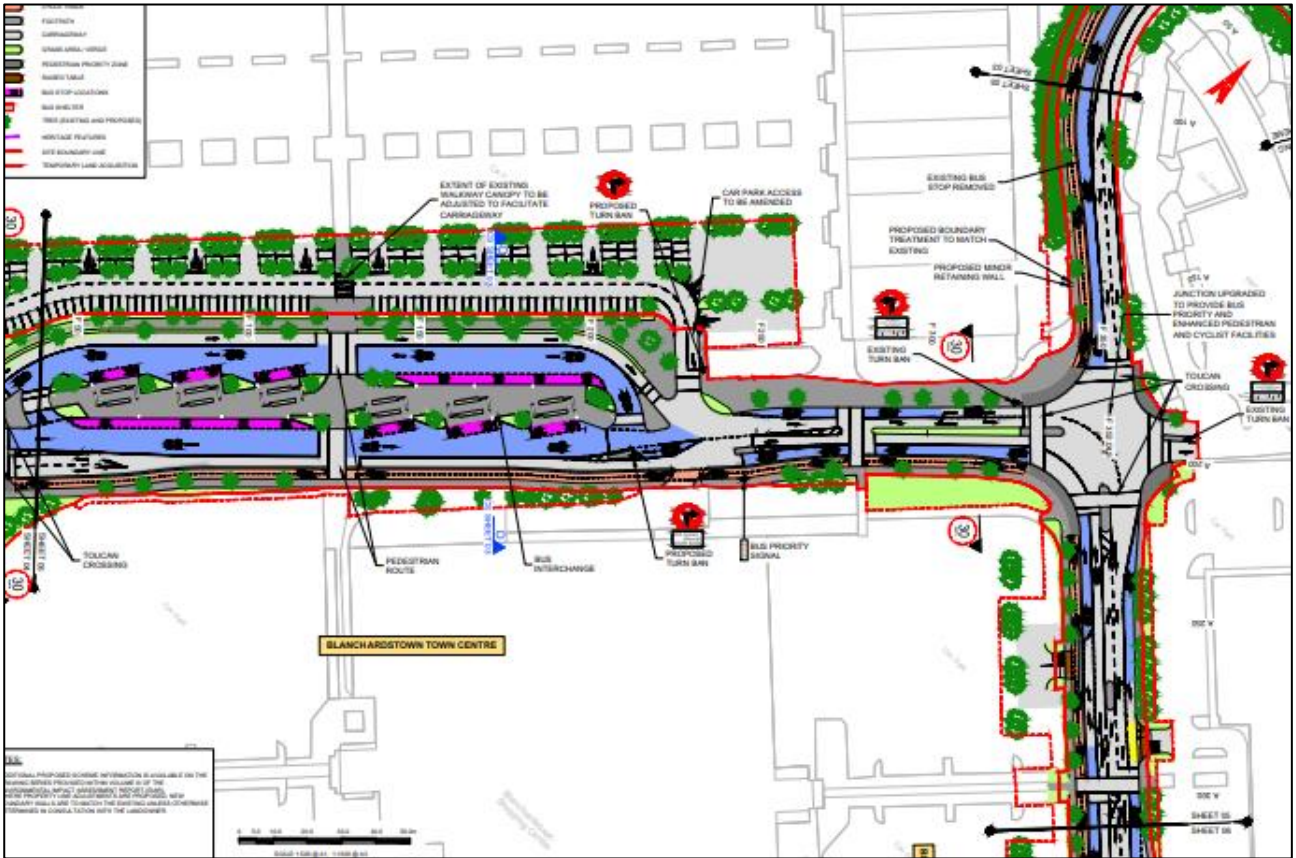


Figure 2.1.4: Extract 4 from General Arrangement Drawing



Figure 2.1.5: Extract 5 from General Arrangement Drawing



Figure 2.1.6: Extract 6 from General Arrangement Drawing

2.1.2 Overview of Submissions Received

As shown in Table 2.1.1 below, 2 submissions were made in relation to the Proposed Scheme at this location.

Table 2.1.1: Submissions made in respect of Mulhuddart / Blanchardstown

No.	Name	No.	Name
19	Councillor Pamela Conroy	90	Roderic O’Gorman

The key issues raised by the submissions relating to the Proposed Scheme at this location are as follows:

1. Slip lanes at junctions
2. Provision of additional cycle lanes

2.1.3 Common Issues Raised

2.1.3.1 Slip Lanes at Junctions

Summary of issue

Submissions raised concerns about the safety of slip lanes and stated that pedestrians and cyclists have to cross the slip lanes, which increases the number of phases pedestrians need to cross the junction. The submissions stated that slip lanes should be removed and replaced with dedicated left turns at junctions in accordance with the Design Manual for Urban Roads and Streets (DMURS), in order to reduce the number of phases.

Submissions requested that the scheme should allow for the provision of a cycle lane on two other roads around the shopping centre to facilitate cyclists, to Blanchardstown Library, Fingal County Council Civic offices, West End shops and onto the Snugborough Road. The submission stated that there are no provisions for cyclists here.

Response to issue

Blanchardstown Road North / Old Navan Road Junction

As noted in TIA Sub-Appendix 2 Junction Design Report of Volume 4 of the EIAR, for the Blanchardstown Road North / Old Navan Road junction (shown in Figure 2.1.1), *the existing signal-controlled junction will be modified by removing the left-turn slip lane from Old Navan Road, while retaining the segregated left-turn lane from Blanchardstown Road North towards the N3 slip road on Old Navan Road. Realigned cycle track crossings will be provided, with signal-controlled crossings across the left-turn slip road.*

The flow of buses through the junction will be maintained by the presence of a bus lane on the Blanchardstown Road North approach, a bus lane on the access from Blanchardstown Bus Interchange past the Crowne Plaza Hotel and allowing buses from the west (on Old Navan Road) to turn right from the straight-ahead traffic lane.

The provision of a segregated left turn lane reflects the particular need at this junction to cater for traffic movements towards the N3 national road.

Blanchardstown Road South / N3 off-slip Junction

As noted in TIA Sub-Appendix 2 Junction Design Report of Volume 4 of the EIAR, for the Blanchardstown Road South / N3 off-slip junction (shown in Figure 2.1.2), *the existing signal-controlled junction will be modified to include a left-turn bus lane on the approach from the Crowne Plaza / N3 westbound off-slip – connecting directly to the bus layover layby on Blanchardstown Road South. Cycle tracks will be provided through the junction on both sides of Blanchardstown Road South.*

The left turn bus lane will ensure minimum delay for buses travelling from the bus interchange to the bus layover location on Blanchardstown Road South.

Blanchardstown Road South / Blakestown Way Junction

As noted in TIA Sub-Appendix 2 Junction Design Report of Volume 4 of the EIAR, for the Blanchardstown Road South / Blakestown Way junction (shown in Figure 2.1.3), *the roundabout junction of the Blanchardstown Road South and Blakestown Way is proposed to be modified to a four-arm signal-controlled junction. Left turning vehicles will cross the outbound bus lane path 20m from the junction. A segregated left turn lane and separate bus lane will be provided for the movement from Blanchardstown Road South towards the shopping centre.*

The left turn filter bus lane will allow a high degree of priority of buses which will include a regular flow of buses returning from the layover spaces on Blanchardstown Road South to the bus interchange. A left turn filter traffic lane from Blanchardstown Road South towards the shopping centre has been provided to facilitate the movement of traffic towards the shopping car parks. A pedestrian island has been provided between the left-turn lanes and straight-ahead lanes on Blanchardstown Road South, to provide pedestrians and cyclists with a safe crossing of the bus lane, while also providing a high level of priority for buses.

2.1.3.2 Provision of additional cycle lanes

Summary of issue

A submission requested that the scheme should allow for the provision of a cycle lane on two other roads around the shopping centre to facilitate cyclists.

A submission stated there should be provision of a cycle lane to Blanchardstown Library, Fingal County Council Civic offices, West End shops and onto the Snugborough Road, as there are no provisions for cyclists.

Response to issue

As noted in Section 2.1 of Chapter 2 of Volume 2 of the EIAR:

The Proposed Scheme is needed in order to enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor through the provision of enhanced walking, cycling and bus infrastructure on this key access corridor in the Dublin region.

Section 3.3. of Chapter 3 Reasonable Alternatives of Volume 2 of the EIAR states the following:

Alternative route options have been considered in a number of areas during the iterative design of the Proposed Scheme, such as the location of offline cycle routes and the road layout in constrained locations.

The iterative development of the Proposed Scheme has also been informed by a review of feedback and new information received during each stage of public consultation and as data, such as topographical surveys, transport and environmental information was collected and assessed.

Section 5.3.1 Section 1 Emerging Preferred Route of the Preferred Route Options Report of the Supplementary Information states the following:

The MCA undertaken in the 'Blanchardstown Town Centre to the Liffey Quays (Ellis Quay) CBC Route Options Assessment' determined that a route along West Street/North Street in Blanchardstown, and along the N3 dual carriageway corridor to the M50 junction, was the preferred route and hence designated as the EPR Option.

It is considered that the options assessment presented in the 'Blanchardstown Town Centre to the Liffey Quays (Ellis Quay) CBC Route Options Assessment' for the EPR appropriately assessed route options and that the selected corridor in Section 1 continues to offer the most benefits for pedestrians, cyclist, and buses and as such is considered to be the PRO.

Refer to Figure 2.1.7 for EPR Option chosen.

This layout was taken forward into the final preferred route option, with the outbound bus lane on Blanchardstown Road South replaced with an outbound bus lane, (and cycle track alongside) between the Crowne Plaza Hotel junction and the N3 off-slip junction, to provide direct access from the bus interchange to the proposed bus layover layby on Blanchardstown Road South.

While it would also be desirable to improve all surrounding areas, the Proposed Scheme has focussed on the stated aim to improve facilities along the corridor.

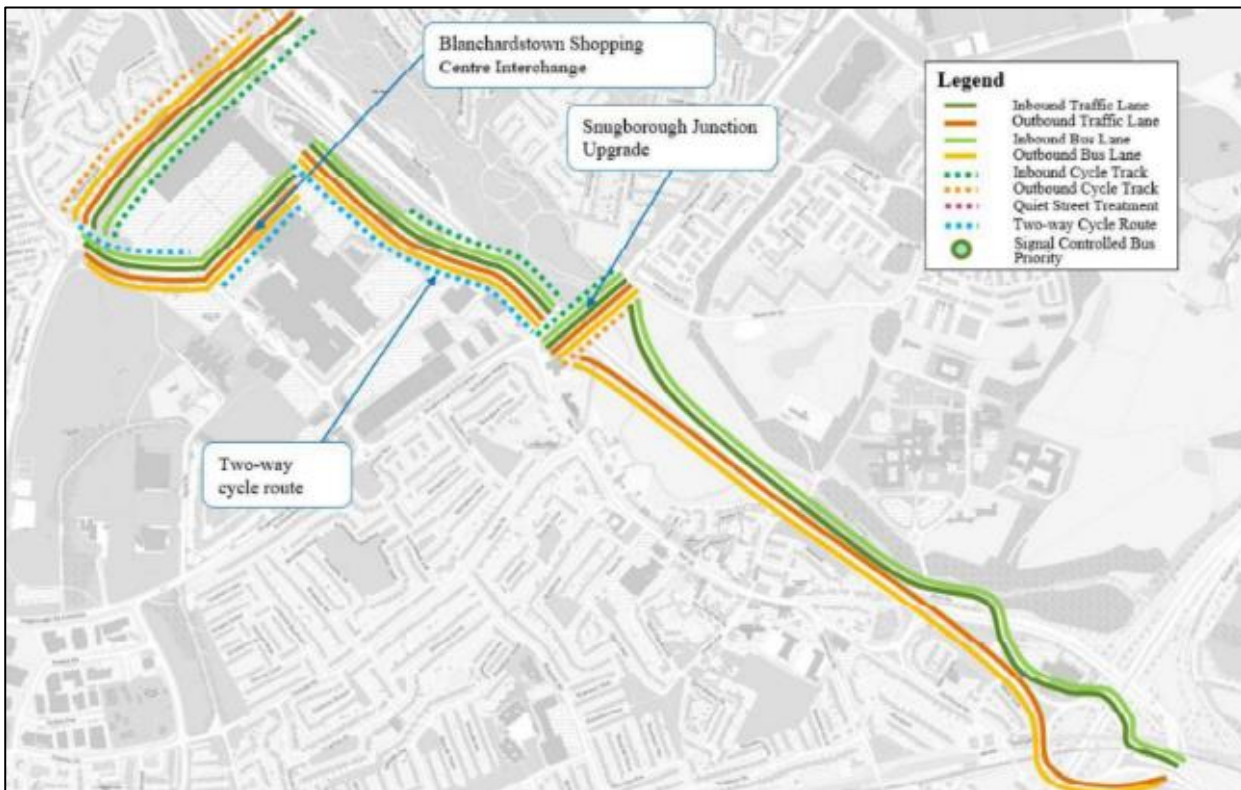


Figure 2.1.7: Section 1 EPR Option

2.2 Proposed Scheme on Navan Road

2.2.1 Description of Proposed Scheme at this location

This refers to the section extending from Navan Parkway railway station to Old Cabra Road junction.

As described in section 4.5.3.1 General overview of the Proposed Scheme of Chapter 4 Proposed Scheme Design of the EIAR, 'east of Phoenix Park Avenue junction, Navan Road enters an urbanised environment (including pedestrian crossings), a 50km/h speed limit will be implemented, which is consistent with the speed limit on Navan Road east of Ashtown Road. The existing 50km/h speed limit along the Navan Parkway on and off-slip ramps will remain in place, with their proposed extents adjusted slightly.

New bus stop lay-bys for inter-urban buses will be provided on both the inbound and outbound Navan Parkway off-slip ramps, with a new inline bus stop located on the inbound on-slip ramp, replacing the existing inline bus stop located on the inbound off-slip ramp. A retaining wall will be required to the rear of the outbound bus stop lay-by. New inbound and outbound bus stop lay-bys and relocated bus stops will also be provided adjacent to Phoenix Park Avenue junction.

At the Ashtown Road junction, the two-way cycle track will be terminated west of the junction, and will transition to a one-way cycle track on each side of the Navan Road carriageway east of the junction.

The two left-in / left-out junctions on opposite sides of Navan Road at Phoenix Park Avenue will be amended to operate as a staggered signal-controlled junction, which will allow left and right turns out of the side roads, left turns into the side roads and right-turns from the west into Phoenix Park Avenue.

The central median between Phoenix Park Avenue junction and Ashtown Road junction will be removed to provide additional space for footpath and cyclist facilities and landscaped verges. At the Navan Road / Ashtown Road junction, the existing roundabout will be modified to a signal-controlled crossroads, with separate pedestrian and cyclist crossings.

As described in section 4.5.4.1. of Chapter 4 of the EIAR, from Ashtown Road junction to the Navan Road / Old Cabra Road junction (also referred to as Ratoath Road junction), *the Proposed Scheme will generally consist of a bus lane and general traffic lane in each direction, with one-way cycle tracks alongside the proposed inbound and outbound bus lanes. Permanent and temporary land take will be required from a number of properties, with the majority being residential, along this Section to accommodate these facilities. Boundary treatment will generally match existing.*

Enhanced cyclist and pedestrian facilities will be provided at each junction along this Section of the Proposed Scheme.

Junction layouts will be amended to include the removal of the right turn filter lane from Navan Road (westbound) into Kempton Avenue and Ashtown Grove, although the right turn movement is permitted. The scheme proposals include for four proposed bus stops with nine existing bus stops to be retained and seven existing bus stops to be removed along this section of the route.

Extracts from General Arrangement Drawings which are provided as an appendix to Chapter 4 in Volume 3 of the EIAR are included below in Figure 2.2.1 to Figure 2.2.11.

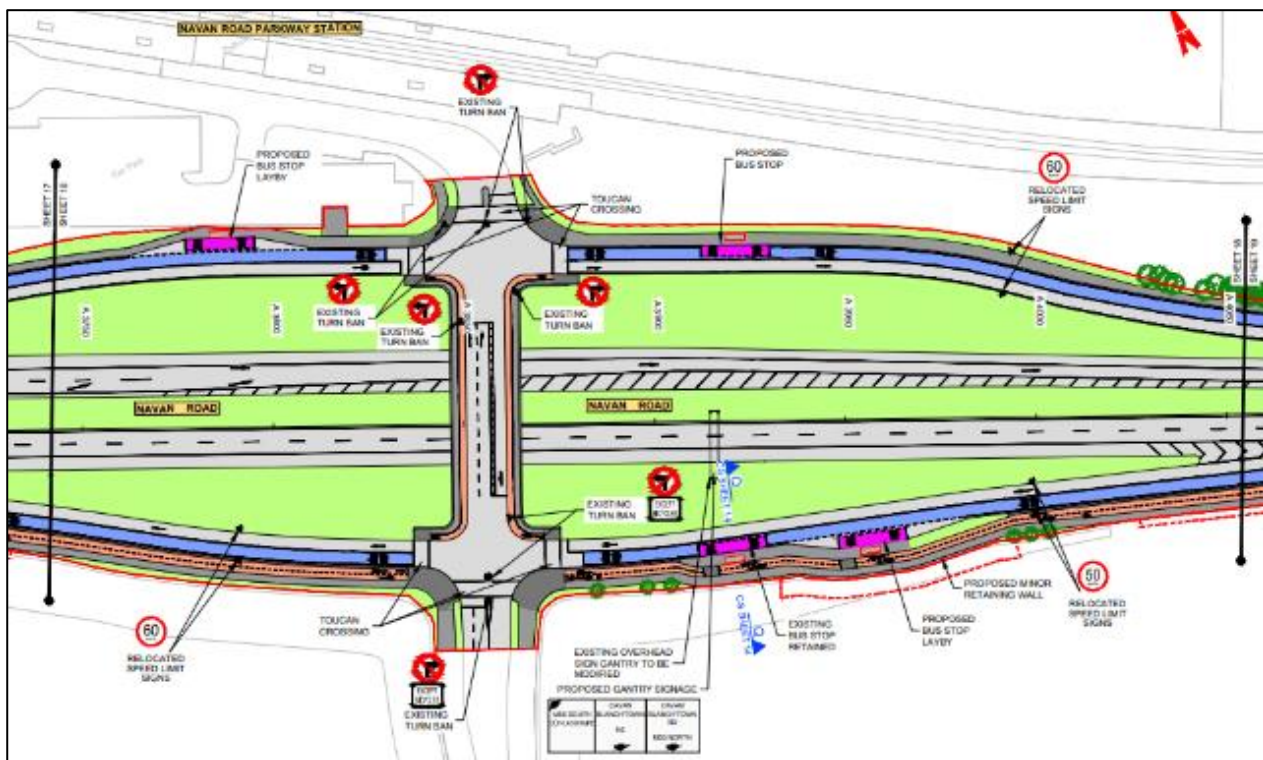


Figure 2.2.1: Extract 7 from General Arrangement Drawing

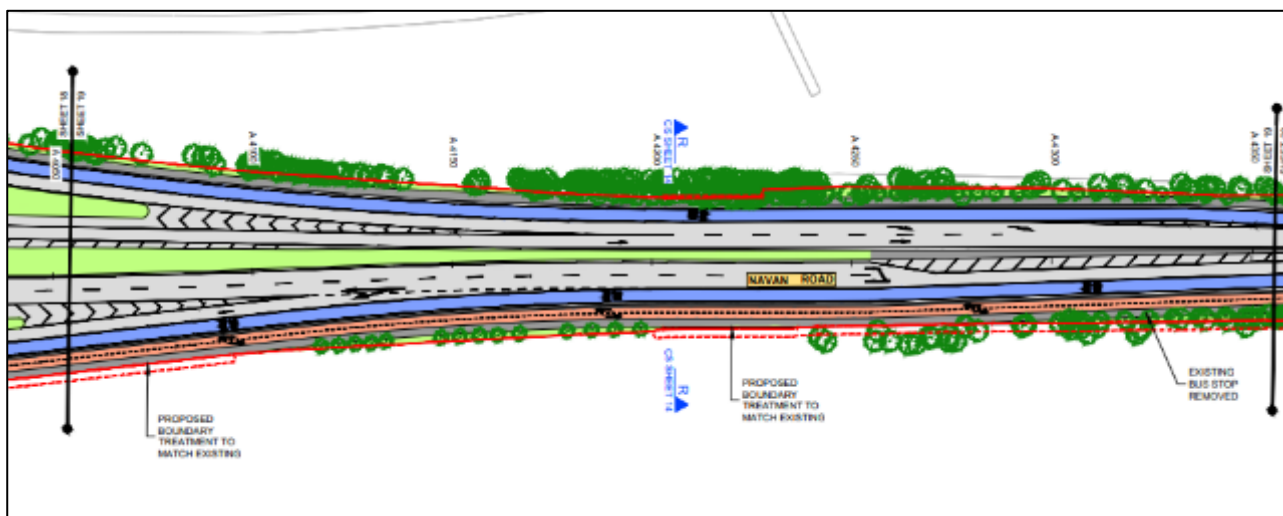


Figure 2.2.2: Extract 8 from General Arrangement Drawing

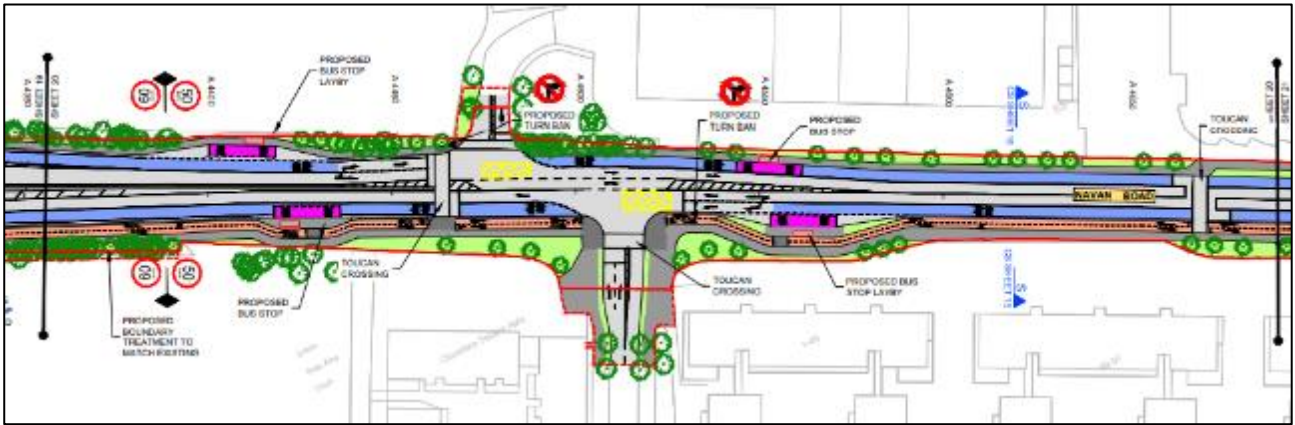


Figure 2.2.3: Extract 9 from General Arrangement Drawing



Figure 2.2.4: Extract 10 from General Arrangement Drawing



Figure 2.2.5: Extract 11 from General Arrangement Drawing

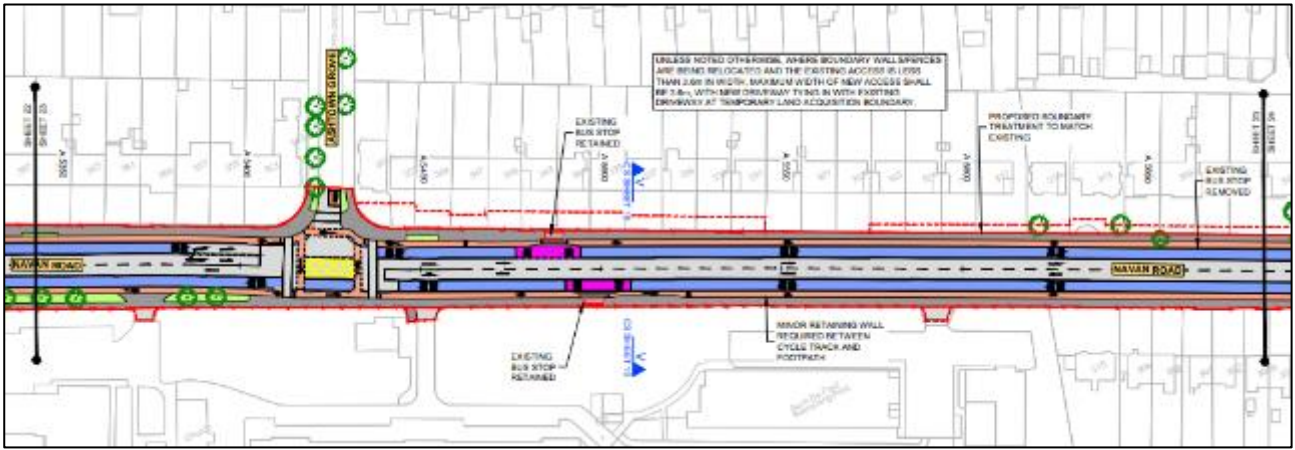


Figure 2.2.6: Extract 12 from General Arrangement Drawing

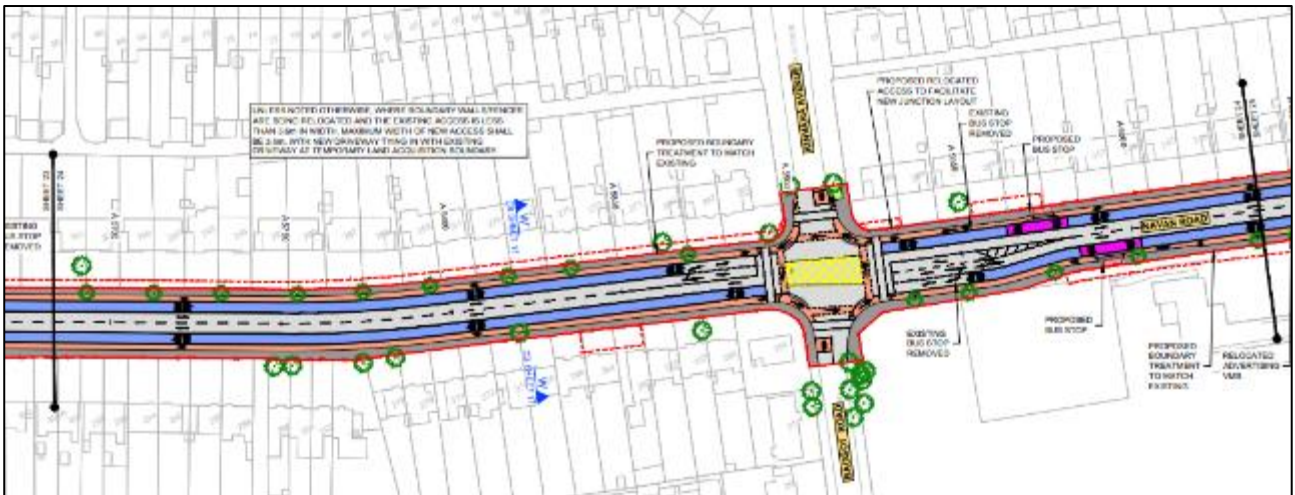


Figure 2.2.7: Extract 13 from General Arrangement Drawing

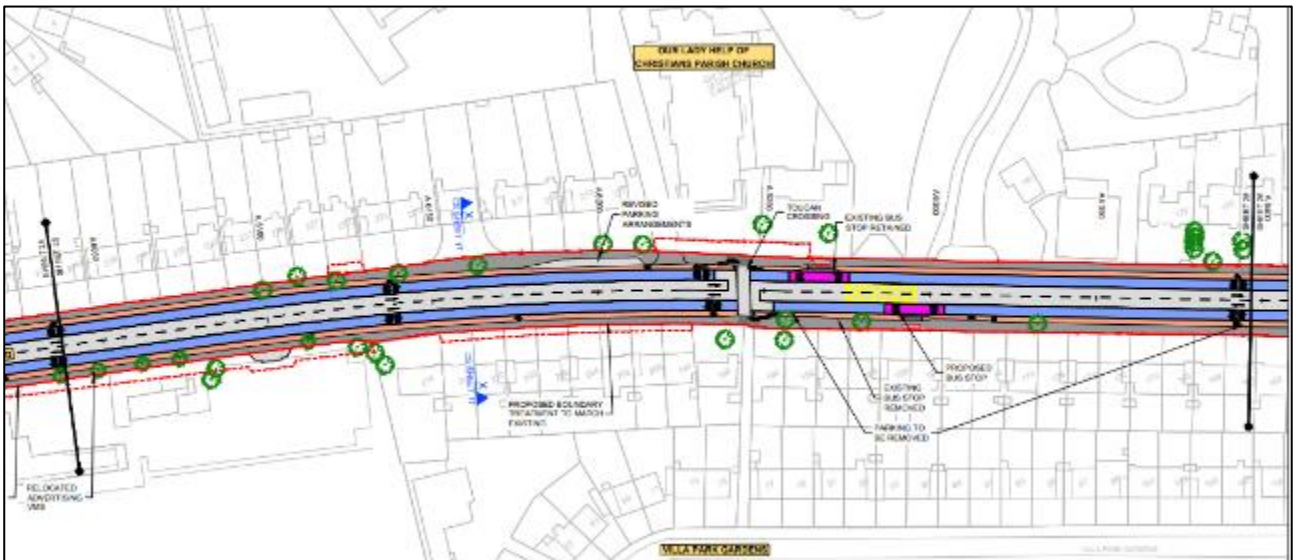


Figure 2.2.8: Extract 14 from General Arrangement Drawing

Table 2.2.1: Submissions made in respect of Navan Road

No.	Name	No.	Name	No.	Name
01	Pat Allison	60	Lorna Leatham	101	Carl Reynolds
16	Jonathan & Anne Clarke	68	Councillor Eimear McCormack	102	Clare Rudden & Richard Kinsella
23	Jeff Dalton & Others	79	Margaret Murray & others	103	Brian Ruddy & Aoife Rush
28	Eamonn Doyle	80	Deirdre & Dermot Nagle	108	Jackie & Bernard Smyth
32	Ann Duffy	82	Navan Road Community Council (additional)	111	Mairead Thorpe
36	Senator Mary Fitzpatrick	83	Navan Road Community Council	113	Colette Timmons
37	Philomena Fortune	86	Kieran O'Brien	114	Catherine Tobin
40	Thomas Good	87	Nick & Susan O'Brien	115	Brendan Twomey
42	Michael Hannon	89	Miriam O'Dwyer	119	Councillor John Walsh
45	John Hiney	90	Roderic O'Gorman TD	122	Tesco Ireland Limited
50	Niall & Antoinette Kavanagh	91	Deidre O'Halloran	123	Thomas Curtin & Karina O'Leary
54	Déirdre Kirwan	93	Paul O'Leary & Brian O'Hanlon		
55	Anna Lalor	96	Cllr. Cieran Perry		

The key issues raised by the submissions relating to the Proposed Scheme at this location are as follows:

- Alternative Route Options
- Support for the Proposed Scheme
- Removal of Ashtown Roundabout
- Removal and provision of trees
- Traffic impact
- Air quality
- Noise and vibration
- Road safety
- Bus stops
- Footpath widths
- Kempton Avenue junction
- Our Lady Help of Christians Catholic Parish Church

- Utility works
- Compulsory Purchase Order (CPO) Process
- Impact on property values
- Accommodation works

2.2.3 Common Issues Raised

2.2.3.1 *Alternative Route Options*

Summary of issue

A submission noted that there was no need for the scheme and a suggestion was made to use Navan Road for an inbound bus lane and Blackhorse Avenue for an outbound bus lane if there is a need to augment additional bus route.

A submission noted that alternatives such as a signal control priority lane provided on other core bus corridor routes has not been provided on the Navan Road negating the need for a bus lane. Moreover, alternatives to the scheme have not been properly considered.

A submission noted that there is already a bus and cycle lane from Halfway House to Cabra Cross which could be upgraded, without the need for removing the trees. The submission went on to state that in the opposite direction, there is a small section of road from Cabra Cross to the Halfway House where there is no bus lane. The submission stated that with the proposed traffic lights at junctions and with signalling prioritising buses, the existing bus and cycle lane should be upgraded without the need to remove mature trees.

A submission suggested that a solution to retain a large number of trees would be to remove the outbound bus lane from Nephin Road to Kempton Estate. Their studies indicate that this would have a very minor impact on journey times along this section of road whilst only reducing the bus lane length by approximately one kilometre.

Submissions proposed using Phoenix Park as the bus route as opposed to the Navan Road and Old Cabra Road to the Quays.

A submission stated that the findings from an assessment of operating in bus lanes in one direction only for short sections as noted in section 5.4.2.2 of the Preferred Route Options report in the Supplementary Information are not available.

A submission noted that the CPO on Navan Road is disproportionate and that alternatives that would reduce impact have not been adequately evaluated.

Submissions stated that the proposed cycle route is not safe and should be located on roads parallel to Navan Road, such as Blackhorse Avenue or Phoenix Park.

A submission stated that the combined use of road space with buses and cyclists alongside one another is wrong. Instead, cyclists should be diverted onto a parallel road with slower moving and smaller vehicles. This would also remove the requirement for CPO.

Submissions noted that there is a loss of residential amenity and private gardens due to an increase in space dedicated to traffic.

A submission stated that they do not see an effort within the documentation to make their community one that has well-being at the core.

Response to issue

Section 2.1 of Chapter 2 Need for the Proposed Scheme of Volume 2 of the EIAR states the following:

Sustainable transport infrastructure assists in creating more sustainable communities and healthier places to live and work while also stimulating our economic development and contributes to enhanced health and well-being when delivered effectively.

The key radial traffic routes into and out of Dublin City Centre are characterized by poor bus and cycle infrastructure in places. Effective and reliable bus priority depends on a combination of continuous bus lanes and signal control priority at pinch-points and junctions. Currently bus lanes are available for 25% of the Blanchardstown to City Centre route, with no signal control priority for buses. Cyclists must typically share space on bus lanes or general traffic lanes with only 9% of the route providing segregated cycle tracks and 34% of the route providing non-segregated cycle lanes. Furthermore, there are key sections of the current bus lanes that are not operational on a 24-hour basis in addition to being shared with car parking facilities and cyclists which compromises the reliability and effectiveness of the bus services in these areas.

Section 3.3 of Chapter 3 Reasonable Alternatives of Volume 2 of the EIAR states the following:

Alternative route options have been considered in a number of areas during the iterative design of the Proposed Scheme, such as the location of offline cycle routes and the road layout in constrained locations. The iterative development of the Proposed Scheme has also been informed by a review of feedback and new information received during each stage of public consultation and as data, such as topographical surveys, transport and environmental information was collected and assessed. In addition, the potential for climate impact was considered in all phases of the design process for the Proposed Scheme. As the design progressed climate was indirectly affected in a positive way by refining the design at each stage through reducing the physical footprint of the scheme coupled with the inclusion of technological bus priority measures.

Key environmental aspects have been considered during the examination of reasonable alternatives in the development of the Preferred Route Option for the Proposed Scheme. Environmental specialists have been involved in the iteration of key aspects of the Proposed Scheme with the engineering design team.

The following key environmental aspects were considered:

- *Archaeological, Architectural and Cultural Heritage – there is the potential for impacts on archaeological, architectural and cultural heritage when providing CBC infrastructure. The assessment had regard to Record of Monuments and Places (RMP), Record of Protected Structures (RPS), Sites of Archaeological or Cultural Heritage and buildings listed on the National Inventory of Architectural Heritage (NIAH) adjacent to the corridor;*
- *Flora and Fauna - Provision of CBC infrastructure could have negative impacts on flora and fauna, for example, through construction of new infrastructure through green field sites;*
- *Soils and Geology - Construction of CBC infrastructure has the potential to negatively impact soils and geology. For example, through land acquisition and ground excavation. There is also the potential to encounter ground contamination from historical industries;*
- *Hydrology - Provision of CBC infrastructure may include aspects (for example structures) with the potential to impact on hydrology;*
- *Landscape and Visual - Provision of CBC infrastructure has the potential to negatively impact on the landscape and visual aspects of the area, for example, by the removal of front gardens or green spaces or the altering of streetscapes, character and features;*
- *Noise, Vibration and Air - Provision of CBC infrastructure (e.g., the construction activities), has the potential to negatively impact on noise, vibration and air quality;*
- *Land Use and the Built Environment - This criterion assesses the impact of each option on land use character, and measured impacts which would prevent land from achieving its intended use, for example through land acquisition, removal of parking spaces or severance of land; and*

- *Climate – Construction works involve negative GHG emissions impacts, while operational efficiencies of public transport, walking and cycling through modal shift from car usage has the potential to reduce GHG impacts.*

The Route Options Assessment used a two-stage assessment process to determine the Emerging Preferred Route Option, comprising:

- *Stage 1 – an initial high-level route options assessment, or ‘sifting’ process, which appraised routes in terms of ability to achieve scheme objectives and whether they could be practically delivered. The assessment included consideration of the potential high level environmental constraints as well as other indicators such as land take; and*
- *Stage 2 - Routes which passed the Stage 1 assessment were taken forward to a more detailed qualitative and quantitative assessment. All route options that progressed to this stage were compared against one another using a detailed Multi-Criteria Analysis in accordance with the Department of Transport Document “Common Appraisal Framework for Transport Projects and Programmes”.*

The Stage 1 assessment considered engineering constraints, high-level environmental constraints and an analysis of population catchments. Numerous links forming part of the “spider’s web” were not brought forward to the Stage 2 assessment due to space constraints, lack of appropriate adjacent linkages to form a coherent end-to-end route, unsuitability of particular routes, the need for significant land take from residential properties in addition to other factors.

Figure 2.2.12 below shows the study area route options selection for the M50 East to Cabra section.

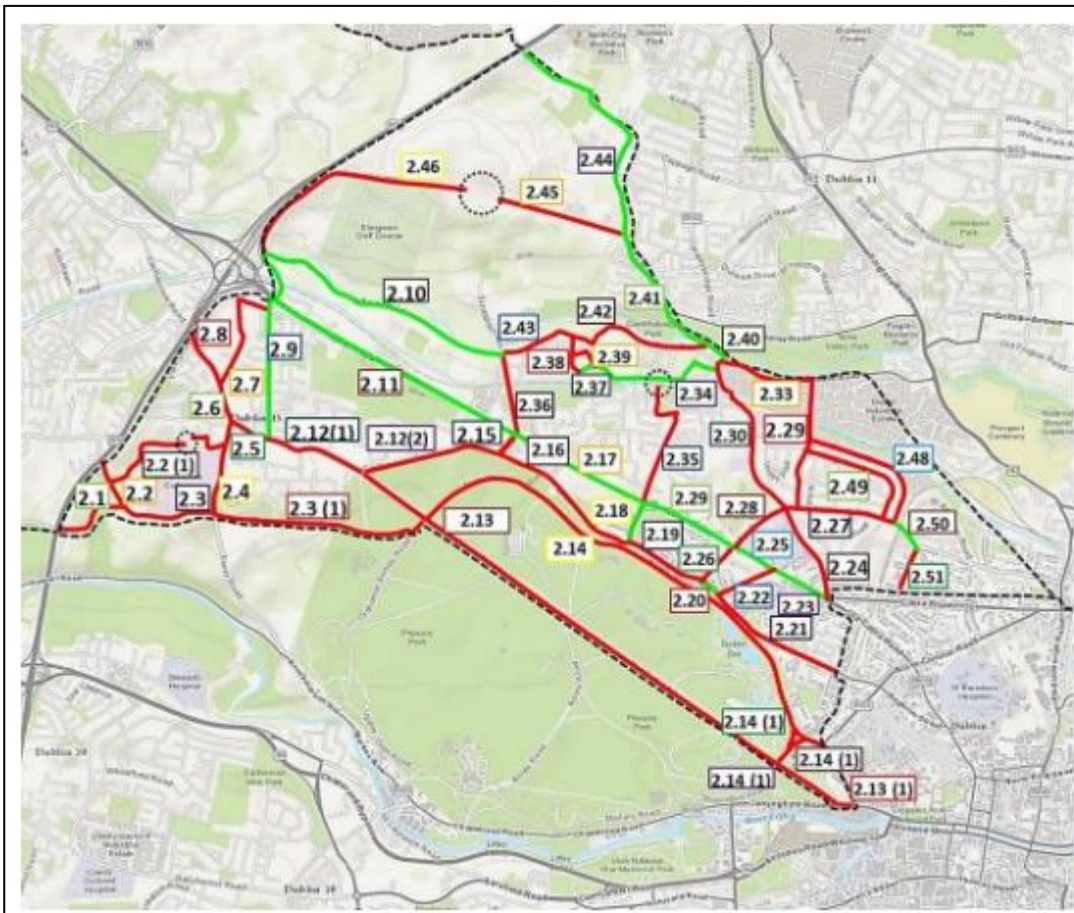


Figure 2.2.12: Image 3.8: Study Area Section 2 (SAS 2) (M50 East to Cabra) Route Options Sections (in green) which passed Stage 1 Assessment. Figure 5.5 Route Options Assessment (2018).

Following completion of Stage 1 initial appraisal, the remaining reasonable alternatives options were progressed to Stage 2 of the assessment process. This process involved a more detailed qualitative and quantitative assessment using criteria established to compare the route options.

The indicative scheme for each route option was evaluated using a multi-criteria assessment. The 'Common Appraisal Framework for Transport Projects and Programmes' published by the Department of Transport, Tourism and Sport (DTTAS), March 2016, requires schemes to undergo a 'Multi-Criteria Analysis' (MCA) which evaluated the route options under the assessment criteria set out below:

1. *Economy;*
2. *Safety;*
3. *Integration;*
4. *Accessibility & Social Inclusion; and*
5. *Environment.*

Under each headline criterion, a set of sub-criteria were used to comparatively evaluate the options. For the Environment criterion the following sub-criteria were considered in the assessment to inform the Emerging Preferred Route:

- *Archaeological, Architectural and Cultural Heritage – there is the potential for impacts on archaeological, architectural and cultural heritage when providing CBC infrastructure. The assessment had regard to Record of Monuments and Places (RMP), Record of Protected Structures (RPS), Sites of Archaeological or Cultural Heritage and on buildings listed on the National Inventory of Architectural Heritage (NIAH) adjacent to the corridor;*
- *Flora and Fauna - The provision of CBC infrastructure could have negative impacts on flora and fauna, for example, through construction of new infrastructure through green field sites;*
- *Soils and Geology - Construction of infrastructure necessary for the provision of the CBC has the potential to negatively impact on soils and geology. For example, through land acquisition and ground excavation. There is also the potential to encounter ground contamination from historical industries;*
- *Hydrology - The provision of CBC infrastructure may include aspects (for example structures) with the potential to impact on hydrology;*
- *Landscape and Visual - Provision of CBC infrastructure has the potential to negatively impact on the landscape and visual aspects of the area, for example, by the removal of front gardens or green spaces or the altering of streetscapes, character and features;*
- *Noise, Vibration and Air - Provision of CBC infrastructure (e.g., the construction activities), has the potential to negatively impact on noise, vibration and air quality along a scheme. For example, through construction works. The impact was quantified on whether the road is moving closer to a sensitive receptor, for example road widening or new realignment; and*
- *Land Use and the Built Environment - This criterion assesses the impact of an option on land use character, and measured impacts which would prevent land from achieving its intended use, for example, through land acquisition, removal of parking spaces or severance of land.*

Route options were compared based on a five-point scale, ranging from having significant advantages to having significant disadvantages over other route options. Route options could also be considered neutral when no apparent advantages or disadvantages are identified across all scheme options.

Following the Stage 1 sifting process for SAS2, the remaining route sections were combined to form one possible continuous route option (Route 2A) between the M50 Junction 6 and the Old Cabra Road junction along Navan Road.

The emerging route option is shown in Figure 2.2.13 below.

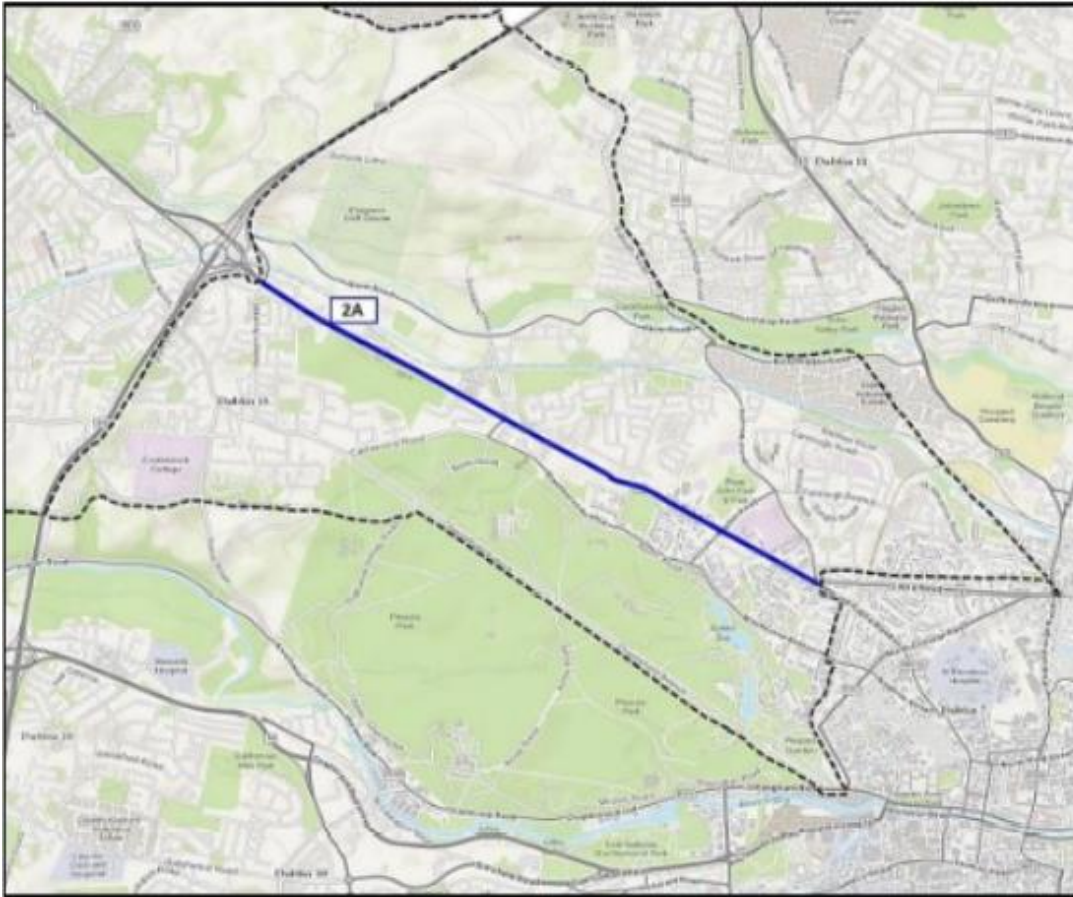


Figure 2.2.13: Image 3.13: SAS 2 – Route Options. Figure 6.19 Route Options Assessment (2018)

Route 2A was explored using different design concepts to identify potential scheme options. The three resulting scheme options (2A1, 2A2 and 2A3) are detailed below. Scheme Option 2A1 proposals (Figure 2.2.14) would incorporate traffic and segregated bus/cyclist facilities on both the inbound and outbound carriageways for the entirety of Navan Road. To facilitate this, widening of the existing carriageway would be required along the majority of the route between Halfway House Roundabout and Cabra Road junction, with land take required in places. Removal of on-street parking and existing trees adjacent to the carriageway would also be required to facilitate carriageway widening.

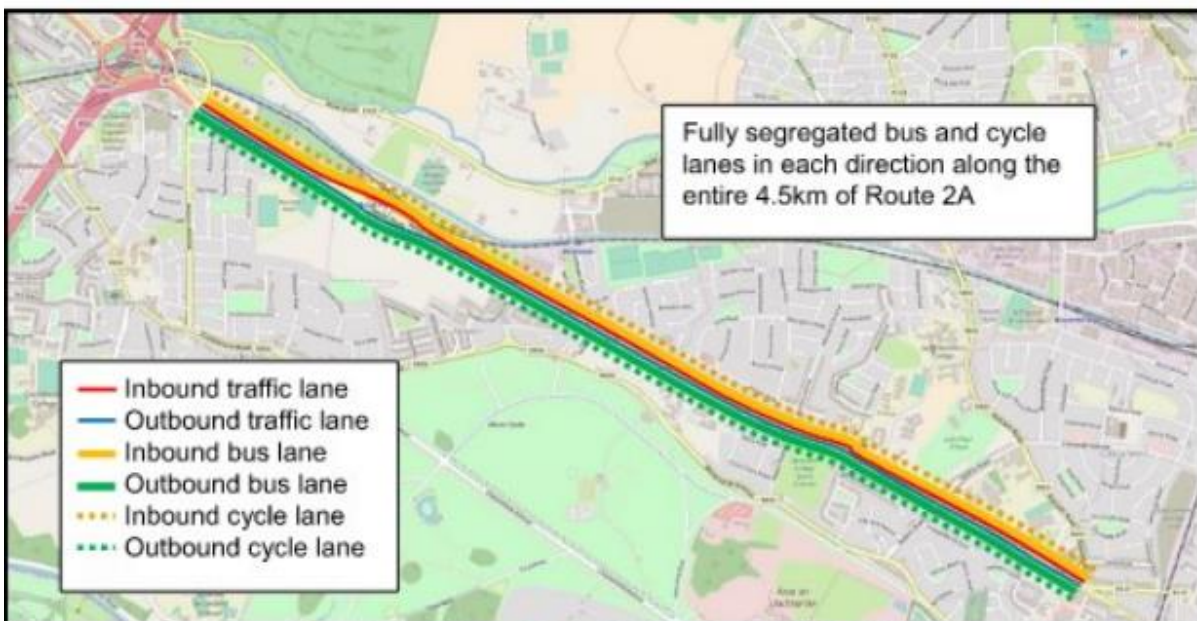


Figure 2.2.14: Scheme Option 2A1 bus and cycle facilities. Figure 6.21 Route Options Assessment (2018)

The Scheme Option 2A2 proposal (Figure 2.2.15) would incorporate a variation to 2A1. Segregated bus and cycle lanes would be provided along the majority of the 4.5km route; however, buses would mix with cyclists for a total 250m in the inbound direction and 630m in the outbound direction. Carriageway widening would be required between Halfway House Roundabout and Cabra Road junction, but no land take would be required. Removal of on-street parking and existing trees adjacent to the carriageway would also be required to facilitate carriageway widening.

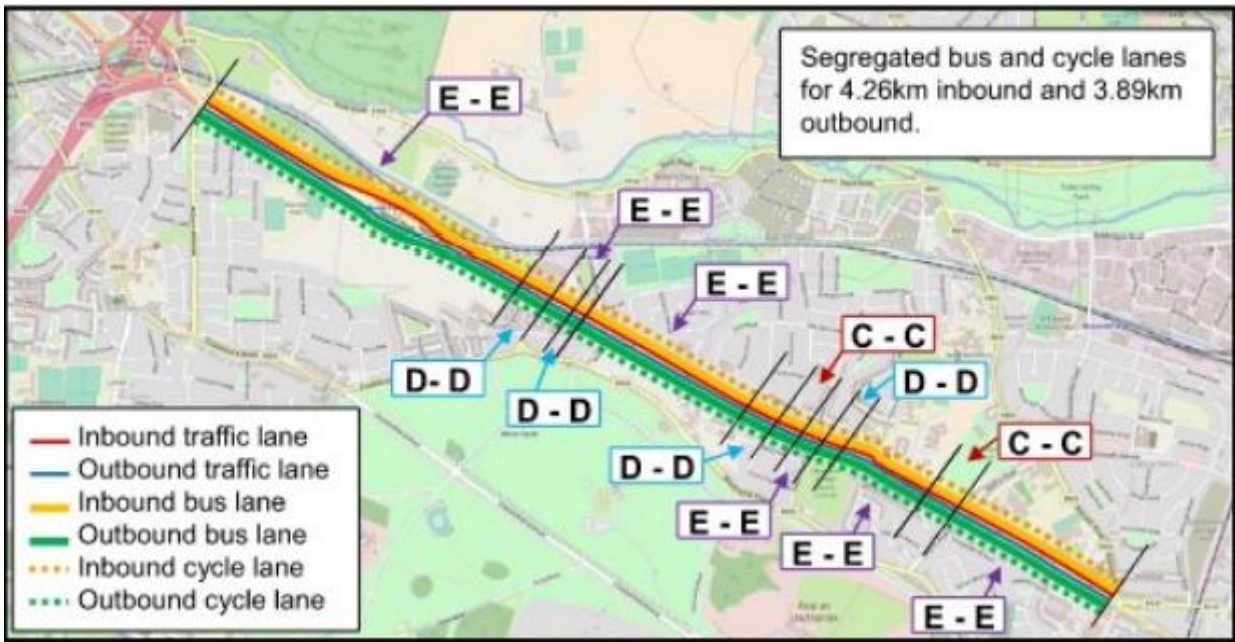


Figure 2.2.15: Image 3.15: Scheme Option 2A2 bus and cycle facilities. Figure 6.23 Route Options Assessment (2018)

The Scheme Option 2A3 (Figure 2.2.16) proposal would be akin to Scheme Option 2A1 in terms of traffic and bus infrastructure; the difference being that 2A3 proposes a two-way cycle track on one side of the road rather than inbound/outbound lanes either side of the road (as per 2A1). To facilitate continuous segregated bus lanes and a two-way cycle track, widening of the existing carriageway would be required along the majority of the route between Halfway House Roundabout and Cabra Road junction, with land take required in places. Removal of on-street parking and existing trees adjacent to the carriageway would also be required to facilitate carriageway widening.

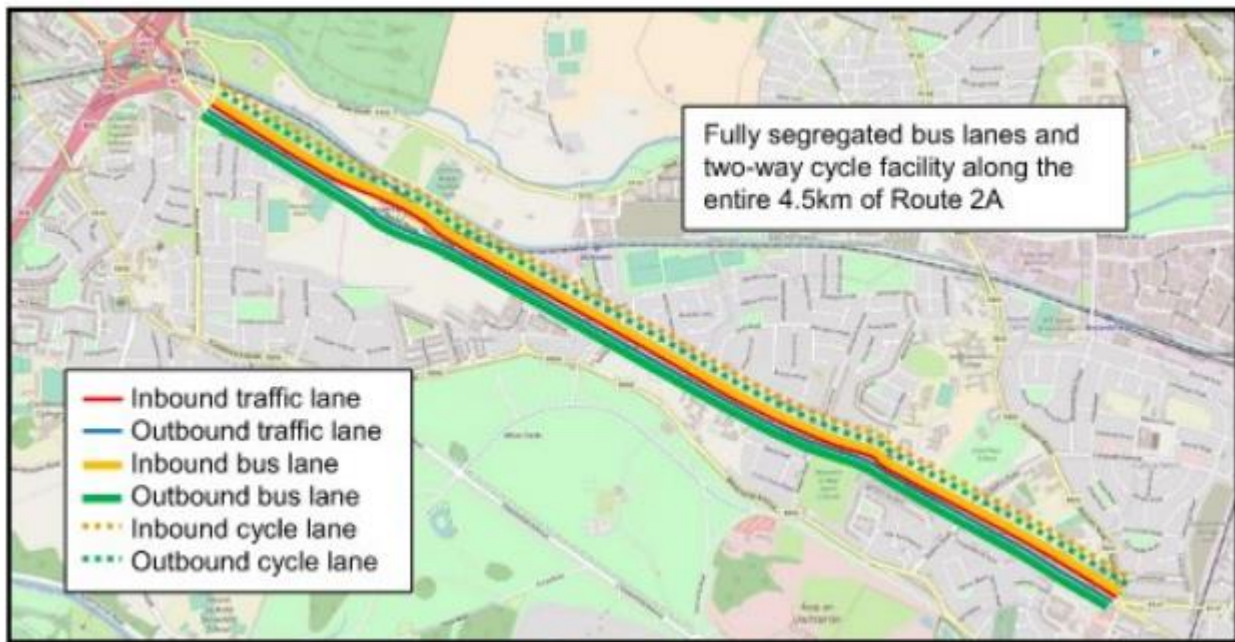


Figure 2.2.16: Image 3.16: Scheme Option 2A3 bus and cycle facilities. Figure 6.25 Route Options Assessment (2018)

Each scheme option was evaluated using a multi-criteria assessment (MCA) with one of the primary criteria being 'Environment', under which there was a number of sub-criteria which each scheme option was considered against comparatively.

All three scheme options (2A1, 2A2 and 2A3) scored neutral across the majority of environmental sub-criteria. Given the similarity in the environmental baseline and the scheme options assessed, similar impacts were anticipated under each environmental sub-criterion for Archaeology and Cultural Heritage, Architectural Heritage, Soils and Geology, Hydrology, Landscape and Visual, Air Quality, Noise and Vibration and Land Use Character.

In terms of Flora & Fauna, all scheme options had the potential to impact on trees however scheme options 2A1 and 2A3 would require tree loss beyond the road boundary and were ranked as a disadvantage in comparison to scheme option 2A2.

Scheme option 2A2 also had disadvantages in terms of Capital Cost due to the land-acquisition required for the provision of fully segregated cycle lanes. Notwithstanding that scheme options 2A1 and 2A3 have greater potential to impact existing trees along the route and beyond the road boundary, the MCA identified scheme option 2A1 as scoring highest in terms of Road Safety and Cycle Network Integration when compared to scheme options 2A2 and 2A3. Scheme option 2A1 was identified as the preferred option for this section and was brought forward into the Emerging Preferred Route.

Section 3.3.3 Cycling Options of Chapter 3 Reasonable Alternatives of Volume 2 of the EIAR states the following:

The concept of re-routing cyclists along Blackhorse Avenue was considered to provide more space for buses and traffic along Navan Road. However, Navan Road is recognised as primary route 4A in the GDA Cycle Network Plan and therefore provision for cyclists must be provided. As a result, the option of re-routing cyclists via Blackhorse Avenue was not considered a suitable option and not taken forward.

Section 6.3.2 of Preferred Route Option Report in the Supplementary Information states the following:

Alternatives were considered, but not progressed, as follows:

Routing of the CBC corridor via Phoenix Park: *Use of Phoenix Park has been identified by stakeholders as a potential alternative route for buses between Blanchardstown and the city centre. However, the general principle for successfully attracting people to use buses is to ensure that the bus service path is as close as potential to where people live, work and visit. In this respect, it is essential that the CBC is routed via Stonybatter in order to ensure that people who live and work there, or need to visit, are able to do so using a high frequency bus service (which is connected to the wider bus network to maximise travel catchment). Hence the potential for routing the CBC corridor via Phoenix Park has not been taken forward for detailed consideration.*

Outbound bus lane (Nepin Road to Kempton Estate)

As noted in section 3.4.1.1 Alternatives Considered at Draft PRO Stage of Chapter 3 Reasonable Alternatives of Volume 2 of the EIAR, reduced provision of bus lane was investigated.

Between R147 Navan Road/Ashtown Road Junction and Navan Road/Ratoath Road Junction, two options were considered:

- *The first option would provide a four-lane carriageway with two bus lanes and two general traffic lanes in both directions with one-way cycle tracks; and*
- *The second option would provide a four-lane carriageway, with intermittent three-lane sections on two short sections of the route. The single lane arrangement would be controlled by bus priority signals. One way cycle tracks are proposed on both sides of the road adjacent to the footpath.*

In terms of environment, both options are considered neutral in terms of potential impacts on Archaeology and Cultural Heritage, Architectural Heritage, Flora and Fauna, Soils, Geology and Hydrology, Air Quality, Noise and Vibration. The only environmental sub-criteria which the second option performs better than the first option is under Landscape and Visual as the first option requires more land acquisition.

However, the first option significantly outperforms the second option in non-environmental sub-criteria such as Economy, Integration and Safety. The first option was identified as the preferred option as it best aligned with the objectives for the Proposed Scheme and provided fully segregated bus and cycle facilities in both directions while maintaining access for general traffic. Whilst the first option has a higher capital cost, it performs significantly better in respect of transport quality and reliability with a journey time saving of 1.5 minutes (inbound and outbound) when compared to the second option. The first option is the preferred option as it is considered to provide segregated bus priority, aligns with the GDA Cycle Network Plan and meets the desirable Proposed Scheme cross-section, notwithstanding that it has a disadvantage in terms of environmental sub-criterion Landscape and Visual.

As stated in section 6.2.2 of the Preferred Route Option Report with respect to the second option, the assessment notes that the implementation of an intermittent three lane section would result in blocking back of traffic queues at junctions and would delay buses travelling in the shared traffic lane. Therefore, for this option, traffic congestion would be increased (due to queuing at junctions) which would adversely impact reliability and punctuality of bus movement - a key objective of the CBC corridor measures.

As can be seen in the cross-section in Figure 2.2.17 below (as per image 4.6 from Chapter 4 of Volume 2 of the EIAR) for the first option, this consists of one general traffic lane in each direction, with a dedicated bus lane in each direction.

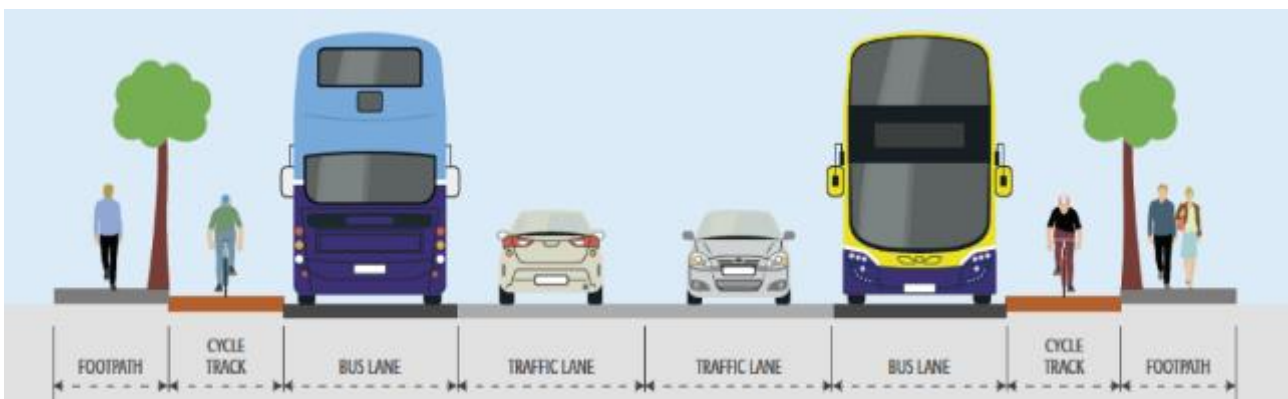


Figure 2.2.17: Typical BusConnects Road Layout

Land take from Private Gardens

Section 4.5.4.10 of Chapter 4 Proposed Scheme Description of Volume 2 of the EIAR states the following:

In this area, permanent land take is required from properties to accommodate widening required for the Proposed Scheme, resulting in the need to relocate boundary walls and gates at these properties.

As noted in section 10.4.4.1.2.1 of Chapter 10 Population of Volume 2 of the EIAR:

A Negative, Moderate and Long-Term land take impact is expected on 137-161 Navan Road (odd numbered properties), 206, 208 and 210 Navan Road and 265-311 Navan Road (odd numbered properties). These properties are losing between 1-5m of land-take permanently.

A Negative, Slight and Long-Term impact on land take is expected on 163, 165, 198, 200, 202, 204, 212, 313-323 Navan Road and the zoned residential land at Ashtown Roundabout. These properties are losing no more than 1m of land take permanently.

2.2.3.2 Support for the Proposed Scheme

Summary of issue

Submissions confirmed their support for the Core Bus Corridor schemes and stated that they want the CBC scheme to be a catalyst to develop:

1. A more efficient transport system to convey the commuter, our elderly and disabled community, and visitors, into and out of the wider city areas in an efficient and comfortable manner
2. A fair and attractively priced fare structure

3. Safe and enhanced cycle lanes and pedestrian paths
4. A new vibrancy in our neighbourhood with initiatives arising from the CBC project
5. This project to be the starting point for the rejuvenation of our Navan Road area and indeed the wider Blanchardstown to City Centre Core Bus Corridor.
6. A reduction in vehicular traffic that is currently impacting on the Air Quality, Noise and Traffic Safety- which should be attained if the proposed new bus routes and infrastructure is correctly put in place
7. A tree lined Navan Road from the Parkway Railway Station to the North Circular Road

Response to issue

The NTA welcome support for the Proposed Scheme and confirm the following in relation to their specific requests for the scheme to be a catalyst:

As noted in section 1.2 Aims and Objectives of Chapter 1 Introduction of Volume 2 of the EIAR, *the aim 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.*

The objectives of the Proposed Scheme 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.*
- *The planning and design of the Proposed Scheme has been guided by these aims and objectives, with the need for the Proposed Scheme described in detail in Chapter 2 (Need for the Proposed Scheme) of this EIAR.*

The outcomes achieved from delivering the Proposed Scheme will be:

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

It is noted that the modelled forecasts for the 2028 opening year indicate that one of the impacts of the proposed Blanchardstown to City Centre Core Bus Corridor Scheme is that there is a reduction of 14% in the number of people travelling via car along the Navan Road corridor towards the city centre at AM peak hour. Similarly at PM peak hour, there is a reduction of 18% in the number of people travelling via car (see diagrams 6.5 and 6.6 in Chapter 6 Traffic and Transport, Volume 2 of the EIAR).

Refer to section 2.2.3.4 which discusses the removal and provision of trees along the R147 Navan Road.

2.2.3.3 *Removal of Ashtown Roundabout*

Summary of issue

Submissions are opposed to the removal of the Ashtown roundabout and noted that the roundabout is the visual symbol of entry to the residential area of the city, acts to slow down traffic to suitable speeds and the proposed signalised junction would not have the same effect. The submissions also objected to the removal of the trees at the roundabout.

Some submissions proposed to signalise the existing roundabout to facilitate traffic and pedestrian movements. A number of submissions acknowledged the need for controlled crossing points for pedestrians and cyclists and feel this can be done without removing the roundabout and the fine stand of pine trees.

A submission stated that the safety of residents who live between Ashtown roundabout and Kempton Avenue have not been considered with the removal of the roundabout.

A submission also stated that the removal of the roundabout in conjunction with the removal of right turning facilities into Kempton Avenue will remove the option of proceeding around the roundabout to make a left turn into the estate, resulting in the Kempton Avenue junction becoming less safe.

A submission noted that whilst disappointed with the loss of trees, welcomed the improvements for pedestrians and cyclists.

A submission stated that a signalised junction will slow all traffic entering and leaving the city and cause massive delays during rush hour.

A submission questioned the proposal to remove the central safety barrier on the western approach to the roundabout.

A submission also asked if the trees can be recycled.

A submission suggested that the removal of the roundabout may cause a wind tunnel effect on nearby roads due to the loss of tall trees.

Concerns raised over the removal of the roundabout junction which is currently situated at the end of the dual carriageway and acts as a traffic calming measure. Additionally, the removal of the roundabout will have a negative impact on pedestrian safety.

Response to issue

As noted in section 4.5.3.9 Landscape and Urban Realm of Chapter 4 of the EIAR, the Ashtown roundabout currently incorporates Monterey Pine trees and presents as a well-known landmark when approaching or departing the city along the N3. The roundabout will be reconfigured as a signalised junction and this change presents an urban realm opportunity. The revised junction will greatly improve pedestrian and cycle facilities at the junction and conversion from a roundabout will provide substantial additional pedestrian space around the junction. This additional space will incorporate high quality hard and soft landscaping that establishes a contemporary landscape character at the junction that will become a new gateway landmark while also facilitating local pedestrian and cyclist movements. Low level shrub planting will provide a buffer between pedestrians and the junction and new trees, ornamental planting, species rich grass areas and high-quality paving will provide an attractive public space. New trees will include semi-mature Monterey Pine referencing the existing trees on the roundabout.

Refer to Figure 2.2.18 below showing proposed landscaping at Ashtown Road Junction, extracted from Landscaping General Arrangement Drawings from Volume 3 of the EIAR.

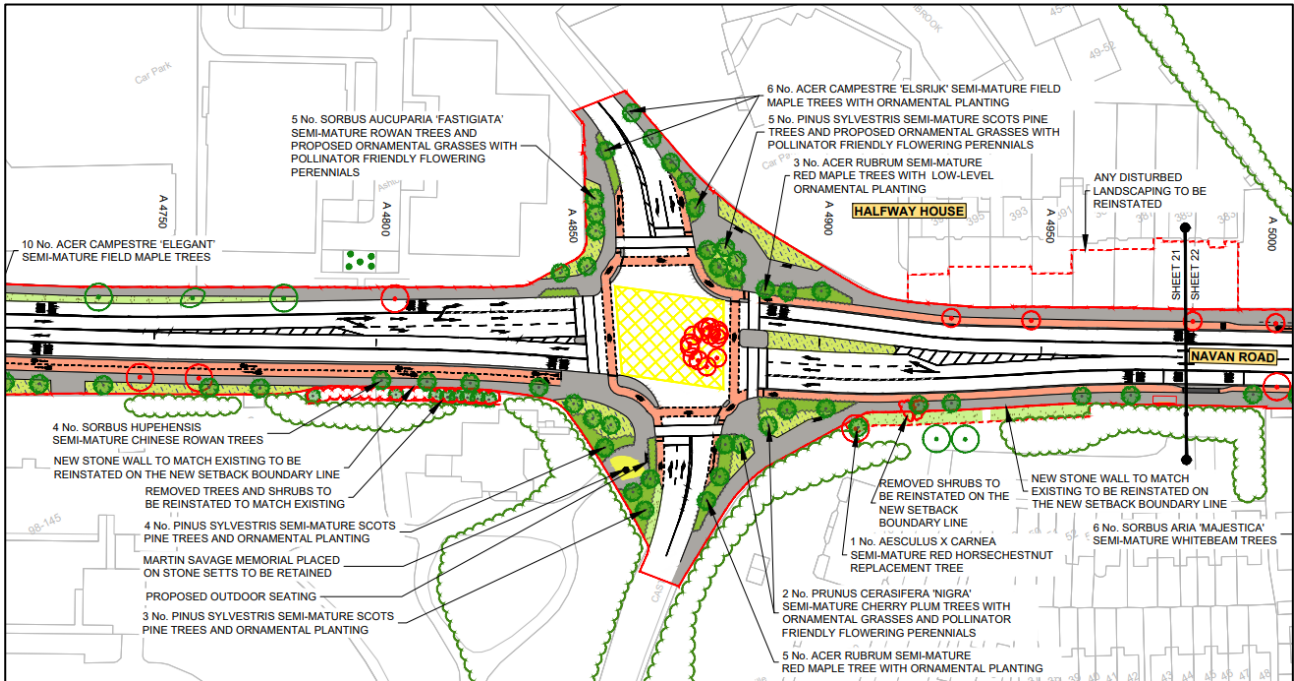


Figure 2.2.18: Proposed landscaping at Ashtown Road Junction (as extracted from Landscaping General Arrangement Drawing)

Section 6.2.2.2.1 of the Preferred Route Option Report outlines the design decisions behind removing the existing roundabout and implementing a signal-controlled crossroads junction. It states that *following traffic modelling analysis and consideration of issues raised from the third round of public consultation submissions, it is now proposed to revert to the EPR option of a signal-controlled crossroads junction. The proposed layout includes separate pedestrian and cyclist crossing facilities at the junction, along with enhanced segregation of pedestrians and cyclists from vehicles. This results in improved safety for both pedestrians and cyclists.*

This change is also reflected in Chapter 3 (section 3.4.2) in Volume 2 of the EIAR.

Bus priority is also better achieved with buses being able to move directly through the junction in their dedicated nearside bus lane. This is in comparison to a roundabout layout where turning traffic on the gyratory would have priority, even when signalised, over bus and general traffic on the Navan Road entry points.

Section 4.6 Summary of Horizontal Alignment of the Preliminary Design Report outlines measures that have been implemented to reduce speed limits on this section of the scheme.

It states that as the Proposed Scheme passes through the constrained corridor on approach to the Ashtown Road junction, the proposed layout will see the central median of the existing carriageway removed and the road will change to single carriageway classification in conjunction with a speed limit reduction from 60km/h to 50km/h beyond Phoenix Park Avenue junction towards the city centre. Lane widths will be reduced to 3.0m which will also act to reduce traffic speeds.

As noted in section 17.5.2.1 Review of Photomontages of Chapter 17 Landscape and Visual of Volume 2 of the EIAR, *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 proposed views are shown with proposed planting at approximately 10 – 15 years post completion of the Construction Phase. This below text describes the Proposed Scheme changes as illustrated in the photomontage. The Photomontages are as included in figure 17.2 in Volume 3 of the EIAR.*



Figure 2.2.19: Existing view from Navan Road at Ashtown Roundabout



Figure 2.2.20: Photomontage view as Proposed - View from Navan Road at Ashtown Roundabout

Figure 2.2.20 shows the proposed view from Navan Road at Ashtown Roundabout looking north across the roundabout junction from the verge on the southern edge. The primary changes in the view are: the conversion of the roundabout to a signalised junction; the loss of the central landscape area and tree planting; the addition of segregated cycle tracks and lanes to all adjoining roads and circumnavigating the junction; and addition of new planted beds and street trees to all sides of the junction. There would be a minor neutral change in the character of the view, however, the replacement planting avoids loss of visual amenity.

With respect to recycling of removed trees, section 18.6.1 of Chapter 18 of the EIAR states the following:

Opportunities for reuse of materials, by-products and wastes will be sought throughout the Construction Phase of the Proposed Scheme.

Source segregation: Metal, timber, glass and other recyclable material will be segregated (and waste stream colour coding will be used) during construction works and removed off site to a permitted / licensed facility for recycling.

2.2.3.4 *Removal and provision of trees*

Summary of issue

A submission stated that many who attended a Navan Road Community Council meeting were shocked at the ‘after’ pictures of the Proposed Scheme due to the lack of trees. The submissions stated that the Proposed Scheme is resulting in the removal of at least 150 street trees between the Parkway Railway Station and Cabra Cross, many of those being mature trees. It was suggested that there should be a condition that the trees being removed should be replaced by an equal or greater number of trees that should be planted in properly constructed tree pits, to a recognised standard.

Many of the submissions highlighted the health and environmental benefits the trees provide to the community, this included an increase in biodiversity, reducing noise from passing traffic, providing a visual amenity, shading and removing harmful pollutants, including carbon emissions. For these reasons many submissions suggest that the removal of any trees needs to be justified and should be replaced with similar species in a nearby location.

A submission acknowledged the planting of trees where space exists, however felt that greater effort is needed to retain or replace existing trees and referenced the loss of trees along south side of Navan Road between Ashtown Road and Old Cabra Road Junction.

A submission suggested that due to the limited lifespan of utility services, notably natural gas, An Bord Pleanála (ABP) should rule it inadmissible to use utilities as a reason to exclude tree planting or remove existing trees.

Submissions affirmed that due to trees having a lifespan of several hundred years it is more important to place trees in the right location or keep them in their current locations and divert the utilities locally to facilitate tree planting especially where the utility involved has a limited life such as natural gas.

A submission noted that the trees form a part of the identity of the district. Another submission affirmed that removal of trees along Navan Road will turn the area into a dual carriageway.

Submissions stated that by removing some trees, the NTA is ignoring policies and objectives of the Dublin City Development Plan 2016-2022, Dublin Tree Strategy 2016-2020 and DMURS. The submission stated that planting trees in the footpath will result in exposed roots and low-lying branches in the future. The submission also questioned the removal of some existing trees shown in the footpath.

A submission stated that no consideration of the loss of mature trees is given in the plans and questioned how and where the trees will be replaced. Submissions also objected to the removal of grass margins.

A submission stated that information on replacement trees is limited, and all proposed tree planting should be shown on a plan.

Submissions called for replacement of any trees removed with equivalent semi-mature trees, and not saplings, of similar species in the nearest location and to relocate utilities, where necessary.

A submission noted that there is a lack of diversity with many trees being Sorbus Aria Majestic White Beam, noting that the feature of the Dublin City Tree Strategy is for greater diversity of trees to encourage resilience to disease.

A submission stated that the proposed planting of eight trees adjacent to the Kempton Avenue entrance is unsuitable due to their proximity to mature trees.

A submission suggested that there are tree planting opportunities adjacent to the Navan Road in open spaces and institutional lands including the School for the Deaf.

A submission stated that the hedgerows removed from private gardens has not been adequately covered in the EIAR.

Response to issue

Section 1.1 of Appendix A17.1 Arboricultural Impact Assessment of Volume 4 of the EIAR states:

The objective of the impact assessment was to identify the areas that contained trees, groups of trees or hedgerows, and to ensure where practicable that these areas would be retained, and to identify the trees that are to be removed to facilitate the Proposed Scheme.

The impact assessment report is based on the British Standard BS 5837:2012 Trees in relation to design, demolition and construction – recommendations; this standard gives recommendations and guidance on the principles to be applied to achieve a satisfactory juxtaposition of trees, including shrubs, hedges and hedgerows, with structures. It sets out to assist those concerned with trees in relation to construction to form balanced judgements. This impact assessment report is accompanied by an inventory of trees and hedgerows on site and a tree protection plan. The Arboricultural Impact Assessment and a tree protection plan was prepared for the site to identify trees that may be impacted on by the Proposed Scheme based on the proposed design.

Section 5 of Appendix A17.1 states:

The route traverses both Dublin City Council and Fingal County Council administrative areas, with the boundary between both Local Authorities located in close proximity to the Ashtown Road / Navan Road junction. The relevant development plans of both local authorities have been examined.

National Planning Framework

The National Planning Framework (NPF) seeks to ensure that new development is sustainable and underlines the importance of Green Infrastructure, of which trees form an integral part. This encompasses recognition of the importance of trees in relation to the management of air, soil and water quality along with other associated ecosystem services and climate change adaptation. The NPF also seeks to achieve the protection and enhancement of landscapes and a net gain in biodiversity.

Dublin City County Development Plan 2016 - 2022

Section 10.5.7 of the Dublin City Development Plan 2016 recognises the benefits of trees in humanising spaces, enhancing the environment and minimising the impacts of climate change.

Appendix 1: Existing Tree Preservation Orders in Dublin City 2016-2020 of the Dublin City Development Plan has been reviewed and it has been concluded that there are no TPO's identified within the study area.

Fingal County Development Plan 2017-2023

Chapter 9 Natural Heritage of the Fingal County Development Plan 2017-2023 seeks to protect and enhance biodiversity and landscapes including trees. Objective NH27 seeks to protect existing woodlands, trees and hedgerows which are of amenity or biodiversity value and/or contribute to landscape character and ensure that proper provision is made for their protection and management and Objective NH28 stipulates the use of Tree Preservation Orders (TPOs) to protect important trees, groups of trees or woodlands.

Section 6 of Appendix A17.1 states:

This impact assessment sets out the likely principal direct and indirect impacts of the Proposed Scheme on the trees on or immediately adjacent to the site and suitable mitigation measures to allow for the successful retention of significant trees or to compensate for trees to be removed, where appropriate.

Table 4 of Appendix A17.1 notes that there will be 413 individual trees removed and 9,330 m² of woodland trees removed as a result of the Proposed Scheme.

Section 4.5.4.9 Landscape and Urban Realm of Chapter 4 Proposed Scheme Description of Volume 2 of the EIAR states that where practicable, new street trees will be planted to reinstate some of the tree planting and existing character of the road.

Section 4.6.1.3.1 Planting Strategy of Chapter 4 of the EIAR states the following:

The planting strategy has been developed in response to the objectives set out in both the Fingal County Development Plan 2017 –2023 and the Dublin City Development Plan 2016 – 2022. The planting strategy is also in response to landscape and urban realm opportunities arising from the Proposed Scheme to integrate new infrastructure within the existing local context and to enhance the visual and amenity value of streets and spaces.

The planting strategy includes replacement of street trees and groups of trees that may be impacted by the Proposed Scheme, but also the introduction of new tree planting and street trees within other spaces and along streets. Reinforcement of green infrastructure along the route will improve the overall amenity, character and appeal of the route corridor and localities along it, as well as enhancing biodiversity.

In addition to trees and street trees, other vegetation is also proposed along the route including hedgerows, ornamental planting and amenity grassland, shrub and meadow grass areas. These will be utilised to reinstate property boundaries altered by the Proposed Scheme.

The design process has sought to adopt Sustainable Drainage Solutions (SuDS) to manage storm water run-off. SuDS features have been considered along the route and incorporated within suitable landscape areas in the form of rain gardens, bioretention areas, filter drains, swales, tree pits and permeable paving.

Section 4.6.11.5.1 New Street Trees of Chapter 4 of Volume 2 of the EIAR states:

As noted on the Landscaping General Arrangement (BCIDC-ARP-ENV_LA-0005_XX_00-DR-LL-9001) in Volume 3 of this EIAR, a range of urban street tree species (image 4.13) have been incorporated into the design. The type of tree depends on the location and whether trees are to be planted in grass verges or in tree pits within paved urban environments as appropriate, and also to ensure diversity of species and provide habitats for urban wildlife. Typically, trees will be semi-mature and where appropriate, selected for having a clear stem height to facilitate visual permeability.

Refer to Figure 2.2.21 which reproduces Image 4.13.

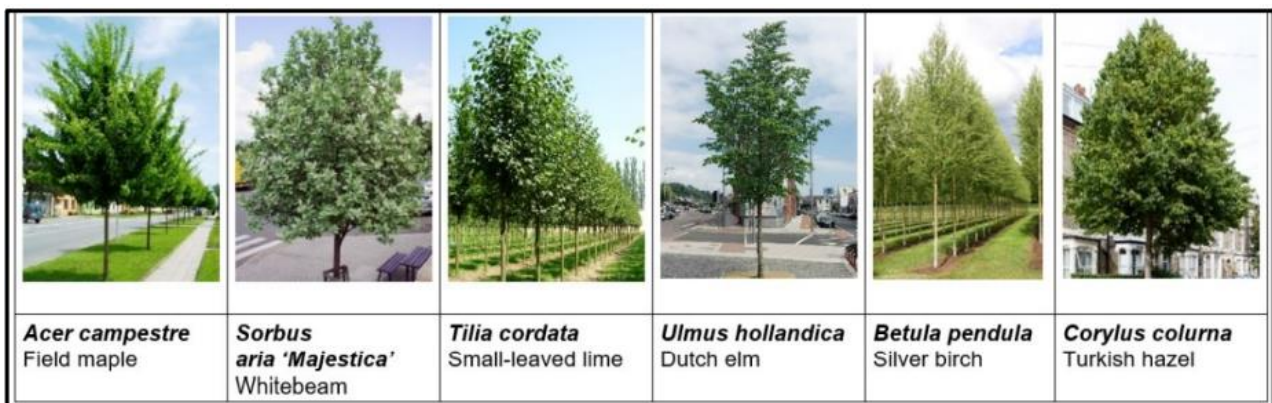


Figure 2.2.21: Street tree species

Table 14.1 of the Preliminary Design Report in the Supplementary Information notes that there will be 793 new trees planted, along with 0.96 ha (9,600 m²) of woodland trees, resulting in an overall net increase of 92% in individual trees and 2.9% of woodland trees as a result of the Proposed Scheme.

As shown on the Landscape General Arrangement drawings in Volume 3 of the EIAR, it is noted that approximately 230 street trees are proposed between Parkway station and Navan Road / Old Cabra Road junction, with the proposed removal of approximately 180 street trees, resulting in a net gain of approximately 50 trees along this section of the Proposed Scheme. Approximately 190 trees are being retained along this section.

As stated in section 9.5 of the Preliminary Design Report, *tree pits will be provided in close proximity to the carriageway, where practicable* and these are shown on the Proposed Surface Water Drainage Works drawings in Volume 3 of the EIAR.

As described in Chapter 3 Consideration of Reasonable Alternatives and noted at section 17.4.1.2 of Chapter 17 Landscape and Visual of Volume 2 of the EIAR, *the Proposed Scheme has been subject to an iterative design development process which has sought insofar as practicable to avoid or reduce negative impacts, including townscape and visual impacts.*

As noted in section 17.5.2.1 Review of photomontages of Chapter 17 Landscape and Visual of Volume 2 of the EIAR, *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 proposed views are shown with proposed planting at approximately 10 – 15 years post completion of the Construction Phase.* This below text describes the Proposed Scheme changes as illustrated in the photomontage. The Photomontages are as included in figure 17.2 in Volume 3 of the EIAR.



Figure 2.2.22: Existing view from Navan Road at St Vincent's Centre



Figure 2.2.23: Photomontage View as Proposed – View from Navan Road at St Vincent's Centre

Figure 2.2.23 shows the proposed view from Navan Road looking northeast along the road from the southern side of the road at the entrance to St Vincent's Centre, which is visible in the foreground. The primary changes in the view are the widening of the road corridor to the north, realignment of garden boundaries, loss of verges and street trees. There is a change to the St Vincent's entrance in the foreground with the replacement of the existing bitmac surface with concrete block paving, and a segregated cycle tracks has been added to each side of the road.

Trees are lost to both sides of the road, however, there is some replacement street tree planting to the north side of the road. There is an overall reduction in the visibility of vegetation in the view and the built elements become more visually dominant. There is a substantial negative change to the character and visual amenity of the view.



Figure 2.2.24: Existing view from Navan Road at Baggot Road



Figure 2.2.25: Photomontage View as Proposed – View from Navan Road at Baggot Road

Figure 2.2.25 shows the proposed view from Navan Road close west of the junction with Baggot Road looking northwest across the road towards semi-detached residential properties on the north side of the road. The primary changes in the view are the widening of the road to the north, subsequent realignment of the garden boundary walls, and the introduction of new street trees to the north side of the road. The road layout is adjusted and a segregated cycle track is introduced to both sides of the road. There would be no appreciable change to the character of the view, and a minor positive change to visual amenity from the addition of the street trees.



Figure 2.2.26: Existing view from Navan Road at Our Lady Help of Christians Church



Figure 2.2.27: Photomontage View as Proposed – View from Navan Road at Our Lady Help of Christians Church

Figure 2.2.27 shows the proposed view from the north side of Navan Road adjacent to Our Lady Help of Christians church, looking southwest towards semi-detached residential properties on the far side of the road. The primary changes in the view are the widening of the road to the south with loss of trees to the far (south) side of the road. The road alignment is changed to two general traffic lanes and two bus lanes with segregated cycle lanes to each side. There are improvements to the urban realm in the foreground with the widening of the footpath and resurfacing with high-quality concrete block paving. Along the road on the right the parking areas have been resurfaced in concrete block paving and a band of block paving has been added crossing the entrance to the church car park. The loss of trees results in an increased dominance of built elements in the view and a loss of visual amenity; however, this is balanced to an extent by the urban realm improvements. Overall, there would be a minor negative change in the character and visual amenity of the view.



Figure 2.2.28: Existing view from Navan Road near Nephin Road



Figure 2.2.29: Photomontage View as Proposed – View from Navan Road near Nephin Road

Figure 2.2.29 shows the proposed view from the south side of Navan Road looking east along the road towards the junction with Nephin Road. The primary changes in the view are the widening of the road, the realignment of garden boundary walls to the far (north) side of the road and the narrowing of the footpath along the near side of the road.

The road layout is altered to two bus lanes and two general traffic lanes, with a segregated cycle lane to each side. New street trees have been introduced to the far side of the road and a new island bus stop is positioned on the right in the middle distance. There will be an appreciable positive change to character and visual amenity of the view due the introduction of the street trees.



Figure 2.2.30: Existing view from Navan Road at St Joseph's School



Figure 2.2.31: Photomontage of Proposed Scheme - View from Navan Road at St Joseph's School

Figure 2.2.31 shows the proposed view from Navan Road looking northeast across the road towards the tall boundary wall of Holy Family School for the Deaf.

The primary changes in the view are the widening of the road, the realignment of the school boundary wall, the loss and replacement of street trees along the far (north) side of the road. A new segregated cycle track has been introduced to each side of the road. There will be no appreciable change in the character or visual amenity of the view.



Figure 2.2.32: Existing view from Navan Road at Cabra Library



Figure 2.2.33: Photomontage of Proposed Scheme - View from Navan Road at Cabra Library

Figure 2.2.33 shows the proposed view from a central traffic island on Navan Road at the junction with the entrance to Cabra Library / MSL Park / adjacent retail park, looking west along the road towards Hampton Square. The primary changes in the view are the narrowing of the footpath and removal of trees to the left side of the road, the removal of the central planted median and trees and the introduction of a segregated cycle track to each side of the road. The mature trees to the Pinehurst residential area are retained. There will be a minor negative change to the character and visual amenity of the view.

As noted in section 17.7 Conclusion of Chapter 17 of Volume 2 of the EIAR, the Proposed Scheme will give rise to some degree of townscape and visual effect. These impacts arise especially where tree removal is required. The Proposed Scheme includes for replacement and additional tree and other planting where practicable. Residual effects will remain for properties experiencing permanent land acquisition and the loss of trees along the R147 Navan Road. However, the Proposed Scheme will also provide substantial levels of replanting of replacement trees, and a significantly enhanced level of service for public transport and for pedestrian / cycle connectivity.

Likewise, the Proposed Scheme provides for improvements in the urban realm, which will provide positive long-term effects for the townscape and visual character in areas such as the Navan Road / Old Cabra Road Junction.

As noted in section 4.5.4.9 of Chapter 4 Proposed Scheme Description of Volume 2 of the EIAR, at this location, new hard and soft landscaping will be introduced to enhance the presentation, amenity and biodiversity value of the junction and to create a more pedestrian friendly and distinctive character. Some existing street trees will need to be removed to facilitate the revised layout, however new tree planting will be provided within the Navan Road median and within peripheral landscape areas that will create an attractive pedestrian environment. Refer to Figure 2.2.34 below.



Figure 2.2.34: Navan Road / Old Cabra Road junction

Regarding the observation that the proposed planting of eight trees adjacent to the Kempton Avenue entrance is unsuitable due to their proximity to mature trees, as noted in section 4.6.11.5.2 of Chapter 4 of the EIAR:

Elsewhere along the Proposed Scheme, there are smaller areas of existing and proposed woodlands and tree groups that will be retained, reinstated or established in order to provide appropriate landscaping connectivity and design interventions at a range of different spaces, including carriageway boundaries, new landscape spaces arising from junction reconfiguration, reinforcement of established vegetation areas, and also establishing new public realm and landscape opportunity areas. Tree species will be determined by location and will comprise either native woodland trees, or selected street trees. Additionally, understory planting, long grass and swathes of bulbs will be provided to reinforce the character of landscaped areas along the scheme corridor.

As noted on the Landscaping General Arrangement Drawings in Volume 3 of the EIAR, eight semi-mature ‘forest pansy’ semi-mature redbud trees will be planted between the existing trees and Kempton Avenue boundary wall. Refer to Figure 2.2.35 below.

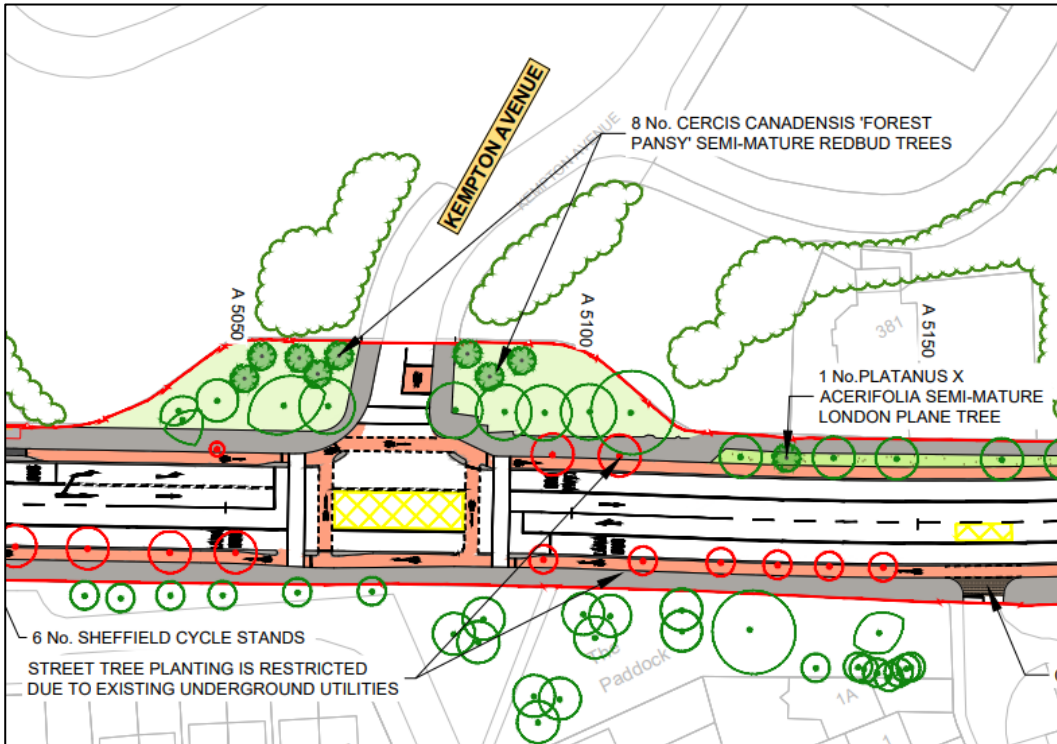


Figure 2.2.35: Extract from Landscaping General Arrangement Drawing at Kempton Avenue Junction

With respect to the observation that hedgerows removed from private gardens has not been adequately covered in the EIAR, section 4.6.11.5.3 Boundary Planting of Chapter 4 Proposed Scheme Description of Volume 2 of the EIAR states the following:

The Proposed Scheme is bounded by a wide range of established private, institutional, commercial and public land boundaries. While the design development has sought to avoid impacts on such boundaries, the Proposed Scheme will nonetheless require both temporary and permanent access to lands beyond the carriageway boundary. Impacted property boundaries will be reinstated following construction. In some instances, boundaries will be re-built along their original alignments. In other cases, boundaries will be re-built on a new setback alignment. In general, property boundaries will be reinstated on a 'like for like' basis, including any walls, piers, fences, railings, gates, driveway finishes and private landscaping. Private grounds that are utilised in part for construction access will be reinstated following completion of the works to match the existing landscaping of the property. Where private grounds are reduced by permanent land take required for the scheme, the remaining grounds will be reinstated to match the landscape and character of the existing grounds in consultation with the property owner.

2.2.3.5 Traffic Impact

Summary of issue

Some submissions raised concerns about increased traffic congestion on the route of the Core Bus Corridor itself, including Kinvara Avenue, as a result of the Proposed Scheme.

A submission stated that there is no plan to reduce vehicular traffic which is currently impacting on the air quality, noise and safety of pedestrians. Suggestions to curb traffic included introduction of a toll to enter Dublin city, ensure no free parking and ban single occupancy vehicles.

A submission stated that the restrictions at Blackhorse Avenue coupled with a 30 km/h speed limit through Phoenix Park will divert traffic along Navan Road.

Response to issue

Table 6.62 of Chapter 6 Traffic and Transport of Volume 2 of the EIAR notes a moderate to significant positive impact on general traffic flows between Auburn Avenue and Cabra Road at AM peak hour, apart for a section between Kinvara Avenue and Skreen Road, which is forecast to increase by 258 PCUs, as noted in table 6.63.

At PM peak hour, table 6.67 of Chapter 6 notes a moderate to significant positive impact on traffic flows as a result of the Proposed Scheme.

At AM peak hour, table 6.64 forecasts a reduction in traffic on Kinvara Avenue and it is noted that at PM peak hour, the forecast change in traffic flow is less than 100 PCUs (i.e. approximately 1 vehicle per minute per direction), which is a very low level of change.

It is noted that the modelled forecasts for the 2028 opening year indicate that one of the impacts of the proposed Blanchardstown to City Centre Core Bus Corridor Scheme is that there is a reduction of 14% in the number of people travelling via car along the Navan Road corridor towards the city centre at AM peak hour. Similarly, in the PM peak hour, there is a reduction of 18% in the number of people travelling via car, as shown in Figure 2.2.36 and Figure 2.2.37 (reproduced from diagrams 6.5 and 6.6 in Chapter 6). This will reduce the overall traffic movement along the Navan Road – City Centre corridor.

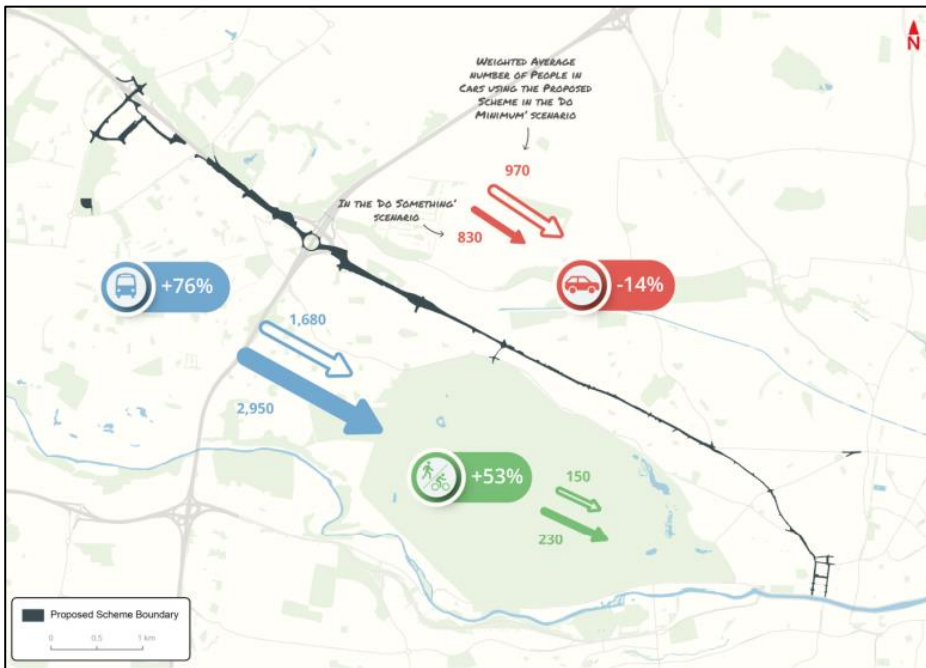


Figure 2.2.36: People Movement by Mode travelling along the Proposed Scheme during 2028 AM Peak Hour (Diagram 6.5 in Chapter 6)

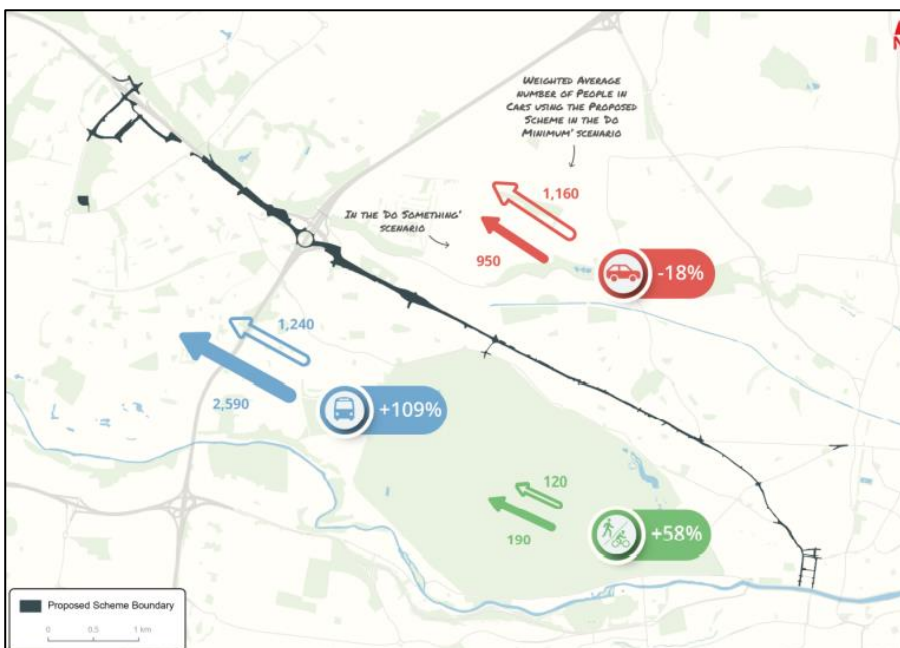


Figure 2.2.37: People Movement by Mode travelling along the Proposed Scheme during 2028 PM Peak Hour (Diagram 6.6 in Chapter 6)

Section 6.4.6.2.8.9 of Chapter 6 Traffic and Transport of Volume 2 of the EIAR states that

Overall, it has been determined that the impact of the reduction in general traffic flows along the Proposed Scheme will be Positive, Significant and Long-term whilst the impact of the redistributed general traffic along the surrounding road network will be Negative, Slight and Long-term.

It should be noted that while Significant effects have been identified, these are at a small number of individual junctions, and effects will be short-lived and localised. This level of congestion is acceptable according to national guidance. Section 3.4.2 of DMURS (2019) recognises that a certain level of traffic congestion is an inevitable feature within urban networks and that junctions may have to operate at saturation levels for short periods of time during the peak hours of the day. Chapter 1 of the Smarter Travel Policy Document also acknowledges that it is not feasible or sustainable to accommodate continued demand for car use. It should therefore be considered that the traffic congestion that is outlined in the impact assessment is acceptable with regard to the urban location of the area and in the context of the increased movement of people overall and by sustainable modes in particular. Therefore, the proposed impacts are considered acceptable when considered against the Scheme Objectives.

2.2.3.6 Air Quality

Summary of issue

A number of submissions raised concerns that levels of air pollution along the Proposed Scheme would increase during construction and operational phase due to a number of factors: the removal of trees, removal of landscaping and vegetation with the garden area, and a reduction in the offset from a residential property to the nearest adjacent proposed bus/traffic lane.

Some submissions raised concerns about the potential health/medical implications of occupants resulting from air pollution. A submission stated that the NTA has failed to demonstrate that the Proposed Scheme will not result in additional exposure to NO₂ levels.

In some cases, submissions suggested that additional mitigation measures such as additional planted trees/landscaping should be introduced, or alternatively residents should be compensated for these provisions.

Another submission stated that the deployment of electric buses along the route would limit emissions.

Response to issue

Chapter 7 'Air Quality' of Volume 2 of the EIAR considers the potential air quality impacts associated with both the Construction and Operational Phases of the Proposed Scheme. Section 7.1 'Introduction' briefly outlines the assessment process and noted the following:

During the Construction Phase, the potential air quality impacts associated with the development of the Proposed Scheme have been assessed. This included construction activities such as utility diversions, road carriageway / cycleway / footway resurfacing and kerb road realignments. Construction traffic construction access routes are also assessed as part of the study area for this phase of the works.

During the Operational Phase, the potential air quality impacts associated with altered traffic flows along the Proposed Scheme, reallocated traffic lanes and displaced traffic flows have been assessed. The assessment has been carried out according to best practice and guidelines relating to air quality.

Construction Phase

In terms of construction impacts, section 7.4.2.3 of Chapter 7 provides the construction phase predicted change in and impact on pollutant concentrations. 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).

- As shown on figure 7.6 of Volume 3 of the EIAR, the receptors along the Navan Road area will experience a negligible to slight beneficial impact in terms of the annual mean NO₂ concentration.
- As shown on figure 7.7 of Volume 3 of the EIAR, the receptors along the Navan Road area will experience a negligible impact in terms of the annual mean PM₁₀ concentrations.

- As shown on figure 7.8 of Volume 3 of the EIAR, the receptors along the Navan Road area will experience a negligible impact in terms of the annual mean PM_{2.5} concentration.

Overall, Section 7.4.2.3 states that in accordance with the EPA Guidelines (EPA 2022) the impacts associated with the Construction Phase traffic emissions are overall neutral and short-term.

Section 7.5.1.1 of Chapter 7 outlines the dust mitigation measures during the construction phase as follows:

In order to ensure that no significant dust nuisance occurs, a series of mitigation measures that are applicable to the Construction Phase of the Proposed Scheme will be implemented. In summary, the mitigation measures will include:

- *Public roads outside the Proposed Scheme will be regularly inspected for cleanliness and cleaned as necessary;*
- *Material handling systems and site stockpiling of materials will be designed and laid out to minimise exposure to wind. Water misting or sprays (or similar dust suppression methods) will be used as required if particularly dusty activities associated with the construction contract are necessary during dry or windy periods;*
- *During movement of dust-generating materials both on and off-site, trucks will be covered with tarpaulin and before entrance onto public roads, trucks will be checked to ensure the tarpaulins are properly in place; and*
- *The appointed contractor will provide a site hoarding of 2.4m height along boundaries where sensitive receptors are located, at a minimum, at the Construction Compounds which will assist in minimising the potential for dust impacts off-site.*

The appointed contractor will keep the effectiveness of the mitigation measures under review and revise them as necessary. In the event of dust nuisance occurring outside the works boundary associated with the Proposed.

Section 7.5.1.2 also outlines the following in relation to construction traffic:

In terms of construction traffic impacts, the Proposed Scheme will have a generally neutral impact on air quality, with some slight adverse impacts. Due to worst-case scenario modelling where in reality the works will be short-term and temporary in nature, the impact on air quality will not be significant. Therefore, no specific construction phase mitigation measures for construction traffic are required.

Operational Phase

In terms of operational impacts, section 7.4.3.3 of Chapter 7 provides the operational phase 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).

- As shown on figure 7.3 of Volume 3 of the EIAR, the receptors along the Navan Road area will experience a negligible impact in terms of the annual mean NO₂ concentration.
- As shown on figure 7.4 of Volume 3 of the EIAR, the receptors along the Navan Road area will experience a negligible impact in terms of the annual mean PM₁₀ concentrations.
- As shown on figure 7.5 of Volume 3 of the EIAR, the receptors along the Navan Road area will experience a negligible impact in terms of the annual mean PM_{2.5} concentration.

Overall, it is noted in section 7.4.3.3 that in accordance with the EPA Guidelines (EPA 2022) the impacts associated with the Operational Phase traffic emissions pre-mitigation are overall neutral and long-term.

It is noted in section 9.4.4.1.1.4 of Chapter 9 of Volume 2 of the EIAR:

The NTA forecast for the year 2028 is 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.

Section 7.5.2 of Chapter 7 outlines the following regarding mitigation measures during the Operational Phase:

As the Proposed Scheme will have a generally neutral impact on air quality, no specific Operational Phase mitigation measures are recommended.

2.2.3.7 Noise and Vibration

Summary of issue

A number of submissions raised concerns that noise levels along the Proposed Scheme would increase due to a number of factors: the removal of trees, removal of landscaping within garden areas and a reduction in the offset from a residential property to the nearest adjacent proposed bus/traffic lane, which may also lead to increased vibration levels experienced.

A submission stated that inadequate information was provided regarding the mitigation measures that are proposed to control noise pollution during the construction and operational phases.

In some cases, submissions suggested that additional mitigation measures such as noise reducing road surfacing, triple glazed windows and additional planted trees/landscaping should be introduced, or alternatively residents should be compensated for these provisions.

A submission raised concerns as to the potential health/medical implications on occupants resulting from noise pollution, as a consequence of both the Construction and Operational phase of the Proposed Scheme.

A submission stated that traffic noise levels for Dublin city suggest that below 55db is desirable during daytime and below 45db at night-time. The submission noted that table 9.20 of Chapter 9 of Volume 2 of the EIAR states that traffic noise levels at Owl Cottage at Navan Road / Nephin Road junction is 70-74db during daytime and 55-59db at night-time, and these readings are undesirable.

Response to issue

Section 9.4.4 of Chapter 9 ‘Noise and Vibration’ of Volume 2 of the EIAR assesses the potential impacts of the Construction Phase and Operational Phase on noise and vibration levels of the Proposed Scheme.

Section 9.4 ‘Potential Impacts’ of Chapter 9 discusses the potential noise and vibration impacts while section 9.5 ‘Mitigation Measures’ outlines any mitigation to be introduced.

Construction Phase

With respect to construction noise impacts, as noted in figure 9.3 of Volume 3 of the EIAR, an Imperceptible/Positive to Not Significant noise impact is forecast along section 4 ‘Navan Road / Ashtown Road Junction to Navan Road / Old Cabra Road junction’ of the Proposed Scheme.

Section 9.5.1.1 of Chapter 9 of Volume 2 of the EIAR states:

The appointed contractor will be required to take specific noise abatement measures to the extent required and comply with the recommendations of BS 5228–1 (BSI 2014a) and European Communities Noise Emissions by Equipment for Use Outdoors (Amendment) Regulations 2006 (S.I. No 241/2006).

The mitigation measures outlined below for the Construction Phase have also been included in the Construction and Environmental Management Plan (Appendix A5.1 in Volume 4 of this EIAR).

These measures will ensure that:

- *During the Construction Phase, the appointed contractor will be required to manage the works to comply with the limits detailed in Section 9.2.4.1 using methods outlined in BS 5228–1 (BSI 2014a); and*
- *The best means practicable, including proper maintenance of plant and equipment, will be employed to minimise the noise produced by on site operations.*

BS 5228–1 (BSI 2014a) includes guidance on several aspects of construction site practices, which include, but are not limited to:

- *Selection of quiet plant;*

- *Control of noise sources;*
- *Screening;*
- *Hours of work;*
- *Liaison with the public; and*
- *Monitoring.*

The 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 Table 9.10 and. Reference to Table 9.54 indicates that intrusive works occurring within 60m of NSLs will need specific noise control measures to reduce impacts depending on time period over which they will occur, i.e. daytime or evening.

Section 9.4.3.3 Construction Vibration of Chapter 9 of Volume 2 of the EIAR states:

During surface breaking activities, there is potential for vibration to be generated through the ground. Empirical data for this activity is not provided in BS 5228–2 (BSI 2014b), however the likely levels of vibration from this activity will be significantly below the vibration criteria for building damage based on monitoring data and experience from other sites. AWN Consulting has previously conducted vibration measurements under controlled conditions, during trial construction works on a sample site where concrete slab breaking was carried out. The trial construction works consisted of the use of the following plant and equipment when measured at various distances:

- *3 tonne hydraulic breaker on small CAT tracked excavator; and*
- *6 tonne hydraulic breaker on large Liebherr tracked excavator.*

Vibration measurements were conducted during various staged activities and at various distances.

Peak vibration levels during staged activities using the 3 tonne breaker ranged from 0.48 to 0.25 PPV (mm/s) at distances of 10m to 50m respectively from the breaking activities. Using a 6 tonne breaker, measured vibration levels ranged between 1.49 to 0.24 PPV (mm/s) at distances of 10m to 50m respectively.

Whilst these measurements relate to a solid concrete slab, the range of values recorded provides some context in relation typical ranges of vibration generated by construction breaking activity.

Widening and upgrading of existing footpaths and kerbs will involve careful deconstruction using controlled techniques. Vibration levels associated with this activity will be of similar or lower magnitude to breaking activities discussed above.

Referring to the vibration magnitudes above and table 9.14, vibration impacts during ground breaking activities using heavy breakers have the potential to generate a negative, slight to moderate, temporary effects at distances of 10m from the activity. Beyond 50m from this type of activity, impacts are reduced to not significant to slight and temporary.

For all other works, vibration impacts will be imperceptible to not significant and temporary. All construction works are orders of magnitude below limits values associated with any form or cosmetic or structural damage for structurally sound or protected or historical buildings or structures referred to in table 9.13.

Notwithstanding the above, any construction activities undertaken on the site will be required to operate below the recommended vibration criteria set out in table 9.13. No vibration sensitive processes have been identified along the Proposed Scheme.

Operational Phase

As noted in figure 9.4 (Opening Year 2028 Traffic Noise Impact Summary) and figure 9.5 (Design Year 2043 Traffic Noise Impact Summary) of Volume 3 of the EIAR, an Imperceptible/Positive to Not Significant noise impact is forecast along Section 4 ‘Navan Road / Ashtown Road Junction to Navan Road / Old Cabra Road junction’ of the Proposed Scheme.

With respect to operational vibration levels associated with passing buses and other vehicular traffic, section 9.4.4.2 ‘Operational Vibration Impact Assessment’ confirms that predicted levels at distances of 2.5m to 10m from the road edge are negligible in terms of human perception and building response.

Consequently, the overall impact is neutral and long term.

Furthermore, mitigation measures are considered in section 9.5.2 ‘Operational Phase’ of Chapter 9 and as noted in table 9.59, the overall predicted noise and vibration level impacts do not require any mitigation measures.

The impact assessment has determined that traffic noise impacts across the study area for the Proposed Scheme results in a positive to neutral imperceptible short and long-term direct impacts along the core bus corridor and negative imperceptible to moderate short and long-term indirect impacts along the surrounding road network. The range of noise level changes and overall noise levels calculated do not require any specific noise mitigation measures to be incorporated into the Proposed Scheme.

2.2.3.8 Road safety

Summary of issue

A submission stated that the safety of children and the elderly are compromised due to widening roads and other road users not obeying traffic lights. It was noted that there had been two serious crashes in recent months and a fatal crash several years ago at the pedestrian lights outside Kempton Estate.

A submission also noted that the Proposed Scheme will impact on school children and elderly in the area. A submission also stated that an assessment of driver site lines should be undertaken at St John Bosco’s School to ensure the widening of the carriageway does not impact the safety of children entering and leaving the school.

A submission stated that junctions and traffic lights would need to be designed to ensure safety is a priority.

A submission queried the appropriateness of directing heavy vehicle traffic through a residential area.

A submission stated that removing pedestrian islands will negatively impact the safety of road users who find these very useful to cross the roads, especially the elderly or those with disabilities.

A submission highlighted safety concerns were raised from residents and local associations previously have not been addressed regarding current driver behaviour on the Navan Road in addition to poor pedestrian facilities.

Response to issue

Section 1.2 of Chapter 1 of Volume 2 of the EIAR states:

The aim 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.

The following is an assessment of the proposed pedestrian infrastructure, cycling infrastructure and bus infrastructure along this section of the Proposed Scheme from Ashtown Road Junction to Old Cabra Road Junction, as stated in section 6.4.6 of Chapter 6 of Volume 2 of the EIAR:

Pedestrian Infrastructure

The key infrastructural changes to pedestrian facilities along Section 4 of the Proposed Scheme are the following:

- *Provision of signalised pedestrian crossings across all arms of the R147 Navan Road / Phoenix Park Avenue junction, where no controlled facilities currently exist;*
- *Provision of signalised pedestrian crossings across all arms of the R147 Navan Road / Ashtown Road roundabout, where no controlled facilities currently exist.*

The impacts to the quality of the Pedestrian Infrastructure as a result of the Proposed Scheme have been considered with reference to any changes to the existing pedestrian facilities along footpaths and crossing locations within the direct study area. Reference has been made to the overall changes along the full length of the Proposed Scheme and the impact assessment primarily focuses only on the pedestrian facilities at junctions to provide a direct comparison between the Do Minimum and Do Something scenarios.

Where the Proposed Scheme introduces a change to a junction layout, the impact on pedestrians has been assessed using a set of criteria which has been derived from guidance listed in Section 6.9. The contents of Table 6.20 (reproduced in Table 2.2.2 below) outlines the assessment criteria for each junction.

Table 2.2.2: 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 (or raised table treatment) 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?

A LoS rating has been applied to each junction for both the Do Minimum and Do Something scenarios based on whether the above indicators have been met.

Table 2.2.3: Pedestrian Junction Assessment LoS

LoS	Indicators Met (of a Total of 5)
A	5
B	4
C	3
D	2
E	1
F	0

The assessment of the qualitative impacts on the pedestrian infrastructure for Section 4 of the Proposed Scheme is summarised in Table 6.37 along with the accompanying sensitivity for each junction and the resultant significance of impact.

Table 6.37 is reproduced as Table 2.2.4 below:

Table 2.2.4: Section 4 – Significance of Effects for Pedestrian Impact during Operational Phase

Junction	Chainage	Do Minimum LoS	Do Something LoS	Magnitude of Impact	Sensitivity	Significance of Impact
R147 Navan Road / Kempton Avenue signalised junction	A5100	F	A	High	Low	Positive Moderate
R147 Navan Road / Ashtown Grove signalised junction	A5425	D	A	Medium	Low	Positive Moderate
R147 Navan Road / Kinvara Avenue / Baggot Road signalised junction	A5900	E	A	High	Medium	Positive Very Significant
R147 Navan Road / Nephin Road signalised junction	A6650	C	A	Medium	High	Positive Very Significant
R147 Navan Road / Skreen Road signalised junction	A6975	E	A	High	High	Positive Profound
R147 Navan Road / Hampton Green signalised junction	A7125	E	A	High	Medium	Positive Very Significant
R147 Navan Road / Cabra Library signalised junction	A2700 (north)	D	A	Medium	Medium	Positive Significant
R147 Navan Road / R805 Old Cabra Road signalised junction	A2700 (south)	D	B	Medium	High	Positive Very Significant
Section Summary		E	A	High	Medium	Positive Very Significant

The contents of table 6.37 demonstrate that the Proposed Scheme will have a potential long-term very significant positive impact on the quality of the pedestrian infrastructure at junctions within section 4.

The LoS during the Do Minimum scenario ranges between C and F, with seven of the eight junctions being assessed as D or lower. In the Do Something scenario, seven of the eight junctions have been assessed as achieving an A, the highest LoS. These improvements are the result of comprehensive pedestrian improvements at junctions along this section, with the provision of compliant footpath and crossing widths, dropped kerbs and tactile paving, and the introduction of design features that will reduce vehicle speeds. This is as a result of the proposed improvements to the existing pedestrian facilities in the form of additional crossing locations, increased pedestrian directness, provision of traffic calming measures to reduce vehicle speeds, improved accessibility and increased footpath and crossing widths. All proposed facilities have been designed in accordance with the principles of DMURS and Building for Everyone: A Universal Design Approach (NDA 2020) with regards to catering for all users, including those with disabilities.

Overall, it is anticipated that there will be a Positive, Very Significant and Long-term effect on the quality of the pedestrian infrastructure along Section 4 of the Proposed Scheme, during the Operational Phase, which aligns with the overarching aim to provide enhanced walking infrastructure on the corridor. A detailed breakdown of the assessment at each impacted junction, including a list of the junctions which experience no change, can be found in Appendix A6.4.1 (Pedestrian Infrastructure Assessment) in Volume 4 of this EIAR.

Section 4.8 of the Preliminary Design Report notes that forward visibility (or Stopping Sight Distance, SSD) has been assessed along the extent of the proposed route against the criteria outlined within the relevant applicable standards of DMURS and TII DN-GEO-03031 for the design speeds listed in Section 4.4. The desirable minimum forward visibility requirements have been achieved along this section of the Proposed Scheme adjacent to St John Bosco’s School.

With respect to accessibility to bus stops for students attending the Edmund Rice College on Navan Road, as noted in section 4.5.3.1 of Chapter 4 of the EIAR:

New bus stop lay-bys for inter-urban buses will be provided on both the inbound and outbound Navan Parkway off-slip ramps, with a new inline bus stop located on the inbound on-slip ramp, replacing the existing inline bus stop located on the inbound off-slip ramp.

Refer to Figure 2.2.1 in this report which shows the location of these bus stops.

Cycling Infrastructure

This assessment outlines the changes to the quality of cycling provision along Section 4 of the Proposed Scheme.

The key cycling improvements along section 4 of the Proposed Scheme can be summarised as follows:

- Provision of 2.0m-wide cycle tracks on both sides of Navan Road for the whole length of Section 4 of the Proposed Scheme, replacing existing on-road cycle lanes; and
- Provision of controlled cycle crossing infrastructure at all signalised junctions on the Proposed Scheme, where currently cyclists share road-space across the junction with traffic. These will benefit both cyclists on the main road corridor and those emerging from side roads.

Table 6.38 presents the overall Do Minimum LoS and Do Something LoS ratings for each segment within Section 4, along with the resultant Impact Assessments. A detailed breakdown of the assessment can be found in Appendix A6.4.2 (Cycling Infrastructure Assessment) in Volume 4 of this EIAR.

Table 6.38 is reproduced as Table 2.2.5 below.

Table 2.2.5: Section 4 – Cycling Impact during Operational Phase

Location	Chainage	Do Minimum LoS	Do Something LoS	Description of Impact	Sensitivity	Significance of Effect
R147 Navan Road: Ashtown Road to Kinvara Avenue / Baggot Road	A4875 – A5900	C	A	Medium	High	Positive Very Significant
R147 Navan Road: Kinvara Avenue / Baggot Road to Nephin Road.	A5900 – A6625	C	A	Medium	High	Positive Very Significant
R147 Navan Road: Kinvara Avenue / Baggot Road to R805 Old Cabra Road	A6625 – A7400	C	A	Medium	High	Positive Very Significant
Section Summary		C	A	Medium	High	Positive Very Significant

The contents of table 6.38 demonstrate that the Proposed Scheme will have an overall potential long-term positive impact on the quality of the cycling infrastructure along section 4.

The LoS for each of the three sub-sections in the Do Minimum scenario has been assessed as C, indicating that the existing facilities are generally adequate, but not of a particularly high standard. The LoS in the Do Something scenario show improvements on every sub-section, with each being brought up to a LoS of A by the Proposed Scheme, as the result of the introduction of fully segregated cycle tracks that will replace on-road cycle lanes.

Overall, it is anticipated that there will be Positive, Very Significant and Long-term effect to the quality of the cycling infrastructure along Section 4 of the Proposed Scheme, during the Operational Phase. A detailed breakdown of the assessment along each section can be found in Appendix A6.4.2 (Cycling Infrastructure Assessment) in Volume 4 of this EIAR.

The findings of the cycling assessment fully align with the objective of the CBC Infrastructure Works, applicable to the Traffic and Transport assessment of the Proposed Scheme, to ‘Enhance the potential for cycling by providing safe infrastructure for cycling, segregated from general traffic wherever practicable’.

Bus Infrastructure

There are currently 16 bus stops along this section of the Proposed Route – nine ‘inbound’ stops towards the city centre and seven ‘outbound’ stops heading towards Ashtown Road.

Under the proposals, there will be a total of 13 stops – six inbound and seven outbound. Three of the nine inbound and one of the seven outbound stops will be removed. This rationalisation aims to strike the right balance between bus stop catchments and bus journey time reliability. All of the current stops that are within lay-bys will be changed to in-line stops within bus lanes, which will have a beneficial effect on bus journey times.

Bus lanes will be provided in both directions for the full extent of this section, greatly improving bus priority, particularly in the westbound direction. A bus priority signal will be introduced on the eastbound R147 Navan Road at the Hampton Green junction.

Outbound Stop 1805, which is currently located to the east of Old Cabra Road is currently within Section 5. This will be relocated just to the west of Old Cabra Road (into section 4) as part of the scheme. This has been included in the analysis for Section 5.

Table 6.39 summarises the proposed changes to bus stop facilities in section 4 of the Proposed Scheme.

Table 6.39 has been reproduced as Table 2.2.6 below.

Table 2.2.6: Overview of Changes in Bus Stop Facilities in Section 4 – Asstown Road to R805 Old Cabra Road

Bus Stop Facility	Do Minimum		Do Something		Comment
	No. of Stops	Percentage of Stops	No. of Stops	Percentage of Stops	
RTPI (Real Time Passenger Information)	11	69%	13	100%	RTPI added to all bus stops.
Timetable information	16	100%	13	100%	Timetable information added to be provided at all bus stops.
Shelter	13	81%	13	100%	Shelters to be provided at all bus stops.
Seating	13	81%	13	100%	Seating to be provided at all bus stops.
Accessible Kerbs	5	31%	13	100%	Accessible kerbs added to all bus stops.
Indented Drop Off Area	9	56%	0	0%	All of the stops will be located inline within bus lanes, meaning that general traffic will not be delayed by stationary buses.
Total Stops	16		13		Three fewer bus stops along Section 4.

The contents of table 6.39 indicate that there are improvements to the bus stop facilities along section 4 of the Proposed Scheme. Existing bus stop facilities in Section 4 are currently of a good standard, with 11 of 16 bus stops having real-time information, and 13 of 16 bus stops having bus shelters. The one area of noticeable deficiency is in the provision of accessible kerbs, with only 5 of 16 bus stops currently having these in place. Under the proposals, all of the existing and relocated stops will be provided with the full range of passenger facilities.

Taking into account the provision of bus lanes, pedestrian accessibility and bus stop facilities outlined within this section, Table 6.40 below outlines the bus qualitative assessment along section 4 of the Proposed Scheme.

Table 6.40 has been reproduced as Table 2.2.7 below.

Table 2.2.7: Section 4 Bus Qualitative Impact during Operational Phase

Section	Chainage	Description of Impact	Impact	Sensitivity of Environment	Significance of Effect
Section 4 – Ashtown Road to Old Cabra Road	A4875 – A7400	<ul style="list-style-type: none"> • Bus lanes provided along the entirety of the corridor. • Number of stops rationalised from 16 to 13, to optimise spacing and journey times. • Improvements to bus stop facilities in this section. 	Medium	High	Positive Very Significant

The Proposed Scheme improves the quality of existing bus infrastructure along Section 4 of the Proposed Scheme, which will provide long term benefits for bus users and aligns with the overarching aim to provide enhanced bus infrastructure on the corridor. The impact for this section of the Proposed Scheme is Medium Positive. The sensitivity of environment rating is predominately categorised as ‘high’. This results in a Positive, Very Significant and Long-term effect on this section.

As noted in section 4.18 of the Preliminary Design Report of the Supplementary Information:

A Stage 1 RSA, including a supplementary road safety audit, has been undertaken on the preliminary design, and designer’s responses and appropriate changes made.

As noted in Appendix M2 Stage 1 Road Safety Audit of the Preliminary Design Report:

The scheme has been examined and this report compiled in respect of the consideration of those matters that have an adverse effect on road safety and considers the perspective of all road users.

All recommended measures or alternative measures proposed by the Designer were accepted by the Road Safety Audit Team.

2.2.3.9 Bus stops

Summary of issue

Safety

Submissions raised safety concerns for pedestrians, elderly people, people with disabilities, wheelchair users and the visually impaired, who will have to pass through the cycle lane to board or alight from a bus.

The submission questioned how cyclists will pass parked buses and questioned if passengers alighting buses have to cross cycle lanes and vice versa.

A submission stated that moving the bus stop opposite Navan Road Church (number 1661) further east will result in it being closer to the entrance of Cabra Convent Secondary School and thus will be a safety concern. The submission suggested it could result in children running across the road and avoiding the signalised crossing.

A submission requested that ‘look left’ and ‘look right’ signage is added at the bus stop layouts to minimise conflict between pedestrians and cyclists.

Capacity

Submissions also raised concerns about the capacity of the bus stops, suggesting a detailed analysis should be completed to ensure the design is suitable for the bus stop capacity.

The bus stops that are of particular concern are regarding capacity are:

1. Parkway Outbound – noting that approximately 1000 school children will attend the future Edmund Rice School
2. Ashtown Grove/ Daughters of Charity – Daughters of charity provides services to persons with intellectual and physical disabilities
3. Our Lady Help of Christians Church – approximately 1700 school children attending surrounding schools

4. Boys and Girls Primary School – approximately 1000 pupils
5. St Dominic’s College – approximately 800 pupils
6. Nephin Road St. Declan’s College – approximately 650 pupils

Proximity of cycle stands

Submissions also stated that proposed cycle stands along Navan Road need to be re-examined, as they are too close to the bus stops and areas where elderly, infirmed, wheelchair, blind and impaired people use the bus service.

Response to issue

Safety

Section 4.6.5 Accessibility for Mobility Impaired Users of Chapter 4 Proposed Scheme Description of Volume 2 of the EIAR, outlines *the following non exhaustive list of relevant standards and guidelines that have informed the approach to Universal Design in developing the Proposed Scheme:*

1. *Preliminary Design Guidance Booklet for BusConnects Core Bus Corridors (NTA 2020);*
2. *Building for Everyone: A Universal Design Approach (NDA 2020);*
3. *UK DfT Guidance on the use of tactile paving surfaces; and*
4. *BS8300:2009 +A1:2010 Design of buildings and their approaches to meet the needs of disabled people – Code of practice*

Section 11 of Appendix A4.1 Preliminary Design Guidance Booklet (PDGB) for BusConnects Core Bus Corridor of Volume 4 of the EIAR sets out the key measures to address the concerns raised in relation to vulnerable users at bus stops which is further elaborated in section 4.14.4 and 4.14.5 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, accessibility audits and road safety audits.

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.

Section 4.6.4.5 of Chapter 4 of Volume 2 of the EIAR states:

To improve the efficiency of the bus service along the Proposed Scheme the position and number of bus stops has been evaluated as part of a bus stop review.

A Bus Stop Review report has been completed for the Proposed Scheme, as per Appendix H of the Preliminary Design Report in the Supplementary Information.

Appendix B of the Bus Stop Review report states that the reason bus stop 1661 at Our Lady's Church will be moved 20 metres is so that it is *relocated further from toucan crossing stop line to provide sufficient visibility for approaching drivers of traffic signals, when bus stationary*. This addressed the issue raised in the road safety audit.

Capacity

Section 4.6.4.5 of Chapter 4 of Volume 2 of the EIAR notes the following:

To improve the efficiency of the bus service along the Proposed Scheme the position and number of bus stops has been evaluated as part of a bus stop review.

As noted in the Bus Stop Review report (refer to Appendix H of the Preliminary Design Report in the Supplementary Information):

The purpose of the process was to review the locations of the existing Dublin Bus stops and to determine whether a stop should be removed, relocated, or remain where it is. This exercise was carried out to optimise the performance of the bus services on the Proposed Scheme by reducing the journey time of the bus service, increasing the walking catchment of the bus stops and ensuring that key trip attractors located along the route are sufficiently covered within the catchment of bus stops.

Section 7.1 of the Bus Stop Review Report states the following:

The TFL Bus Stop Design Guidance states that bus stop capacity is a function of bus length, service frequency, the number of serving routes and their average dwell time. The BusConnects Dublin Corridors will generally carry between 15 to 20 buses per hour at peak times, which equates to a bus every 3 minutes. Assuming a maximum dwell time of 1 minute it could be assumed that one bus stop will be sufficient in most cases.

The bus stop review methodology included consideration of the capacity of each proposed bus stop to cater for the projected bus numbers. In a number of locations, existing and proposed bus stops were rationalised based on best practice principles related to bus stop placement.

Proximity of cycle stands

As noted in section 4.6.3.6 of Chapter 6 of Volume 2 of the EIAR, cycle stands will be provided, where practicable, at island bus stops and key additional locations.

As outlined in section 4.6.2.1 of Chapter 4, Proposed Scheme Description of Volume 2 of the EIAR, relevant design standards have been adhered to in relation to footpath widths. *DMURS defines the absolute minimum footpath width for road sections as 1.8m based on the width required for two wheelchairs to pass each other. Building for Everyone: A Universal Design Approach (NDA 2020), defines acceptable minimum footpath widths at specific pinch points as being 1.2m wide over a two-metre length of path.*

Consequently, cycle stands will be provided adjacent to bus stops where minimum unimpeded footpath widths will be achieved.

2.2.3.10 Footpath Widths

Summary of issue

A submission objected to the reduction in footpath widths along Navan Road.

Submissions stated that the footpath width is not 2.8m along the full length of the cottages at 136 to 142 Navan Road, as stated by the NTA in a reply to a query from the cottage residents. The submission noted that the width actually reduces to 1.85m. The submission stated that it is not clear from drawings if traffic signs will reduce the clear width of the footpath.

Response to issue

As stated in section 4.6.2.1 of Chapter 4 Proposed Scheme Description of Volume 2 of the EIAR:

2.0 m is the desirable minimum width for a footpath. This width should be increased in areas catering for significant pedestrian volumes where space permits. DMURS defines the absolute minimum footpath width for road sections as 1.8m based on the width required for two wheelchairs to pass each other.

Building for Everyone: A Universal Design Approach (NDA 2020), defines acceptable minimum footpath widths at specific pinch points as being 1.2m wide over a two-metre length of path.

It is noted in table 4.18 of Chapter 4 (reproduced in Table 2.2.8) that there are two locations along the Navan Road where the footpath is less than the desirable minimum. The justification of the deviations from standard are also noted in the table.

Table 2.2.8: Reduced Standard Cross Sections along Section 4 Navan Road / Ashtown Road Junction to Navan Road / Old Cabra Road Junction Chainage Design.

Chainage	Design Element	Desirable Minimum	Design	Justification
Ch.A5190 to Ch.A5400	Footpath	2.0m	1.6m - 1.8m	To retain existing trees along this stretch of the Proposed Scheme, the existing footpath and verge will be retained at this location. The width varies from 1.6m to 1.8m.
Ch.A6200	Parking layby	Parking Layby = 2.1m min. Cycle track width = 2.0m Buffer = 0.75m Footpath width = 2.0m	Parking Layby = 2.4m min. Cycle track width = 1.5m Footpath width = 1.8m	To facilitate the existing junction with a school and nearby pedestrian crossing, the existing parking layby layout has been retained with the cycle track aligned alongside the road, with the parking layby located behind the cycle track. This layout is not in accordance with the PDGB which requires the cycle track to be deflected to the rear of the parking layby with a 0.75m buffer provided. In addition, minimum footpath width achieved behind layby is 1.8m at pinch point.

The proposed footpath width outside 136 to 142 Navan Road will be approximately 2.1m. This retains the footpath width above the desirable minimum of 2m.

As noted in section 4.2 of the Preliminary Design Report of the Supplementary Information:

The design process has included an Accessibility Audit of the existing road corridor environment, which is enclosed in Appendix I. The audit provided a description of the key accessibility features and potential barriers to mobility impaired people based on good practice, and identified the following issues to be addressed in the design process:

- *Width of footpaths should be clear of clutter, such as street furniture, and allow unimpeded access for the mobility impaired, and in doing so, meet the minimum standards for widths.*
- *All poles for signs and street lighting should be carefully located to minimise the effect on the safe and convenient passage of pedestrians and cyclists, with due cognisance to the safe movement of mobility impaired users.*

2.2.3.11 Kempton Avenue Junction

Summary of issue

Submissions raised concerns regarding the removal of the right turn filter lane and traffic filter green arrow from Navan Road into Kempton Avenue and stated that a right turn filter arrow should be installed similar to Ashtown Grove / Navan Road Junction.

A submission stated this would cause westbound traffic to back-up behind those waiting to turn right, resulting in:

- Motorists making unsafe right turns across oncoming traffic; and
- Vehicles using the bus lane to continue westbound.

A submission stated that the removal of the Ashtown roundabout in conjunction with the removal of right turning facilities into Kempton Avenue will remove the option of proceeding around the Ashtown roundabout to make a left turn into the estate, resulting in the Kempton Avenue junction becoming less safe.

A submission suggested that the proposed pedestrian crossing to the left on exiting Kempton Avenue be removed. It stated that this would facilitate a filter light for traffic turning right from Navan Road into Kempton Avenue and work in conjunction with the pedestrian crossing signal to the right of the junction.

This submission also raised concern about the removal of the slip lane exit out of Kempton Avenue and suggested this will result in longer queueing in Kempton Avenue for those waiting to exit the estate.

Response to issue

TIA Sub-Appendix 2 Junction Design Report of Volume 4 of the EIAR states the following for the Navan Road / Kempton Avenue Junction:

Summary

Nearside bus lanes will be provided in both directions through the junction, with the inbound bus lane to be curtailed 20m from the junction to allow for left turn traffic. Cycle and pedestrians crossing facilities will be provided, and an advanced stop line for cyclists will be provided on the side road.

Signal Operation

A three stage signal operation is proposed. Mainline traffic and buses will operate in the same stage, with left turning vehicles to cross the bus lane path at a distance of 20m from the junction. Cyclists will also operate within the same stage with left turning traffic to give way to cyclists on flashing ambers. This will maximise green time for buses and minimise delay. The side road will operate in its own stage with a flashing amber, followed by pedestrians and right-turning cyclists

It is noted within the Junction Design Report that the junction will operate within capacity, which includes vehicles being able to turn right into Kempton Avenue from Navan Road, and vehicles exiting from Kempton Avenue.

An extract from Table 6.37 of Chapter 6 of Volume 2 of the EIAR (reproduced as Table 2.2.9 below) indicates a positive moderate impact for pedestrians as a result of the Proposed Scheme.

Table 2.2.9: Section 4 – Significance of Effects for Pedestrian Impact during Operational Phase

Junction	Chainage	Do Minimum LoS	Do Something LoS	Magnitude of Impact	Sensitivity	Significance of Impact
R147 Navan Road / Kempton Avenue signalised junction	A5100	F	A	High	Low	Positive Moderate

As noted in section 6.4.6.1.5.1 of Chapter 6 with respect to all junctions along this section of the scheme:

The LoS during the Do Minimum scenario ranges between C and F, with seven of the eight junctions being assessed as D or lower. In the Do Something scenario, seven of the eight junctions have been assessed as achieving an A, the highest LoS. These improvements are the result of comprehensive pedestrian improvements at junctions along this section, with the provision of compliant footpath and crossing widths, dropped kerbs and tactile paving, and the introduction of design features that will reduce vehicle speeds. This is as a result of the proposed improvements to the existing pedestrian facilities in the form of additional crossing locations, increased pedestrian directness, provision of traffic calming measures to reduce vehicle speeds, improved accessibility and increased footpath and crossing widths. All proposed facilities have been designed in accordance with the principles of DMURS and Building for Everyone: A Universal Design Approach (NDA 2020) with regards to catering for all users, including those with disabilities.

2.2.3.12 Our Lady Help of Christians Catholic Parish Church

Summary of issue

A submission stated that the practice of parking hearses and mourning cars outside the church needs to be maintained. It stated that the NTA should provide details as to how the area will be used in the event of a funeral.

A submission questioned how access to the church would be policed as hearses and cars will have to gain access across the bus lane and cycle lane. The submission also stated that the entrance to the church should not be interfered with to ensure safety of users.

Submissions stated that church goers will be affected by the proposed restrictions on parking.

Response to issue

An extract from the General Arrangement Drawings which are in Volume 3 of the EIAR is included below in Figure 2.2.38. It shows that the lands to the front of the church will be temporarily acquired. This will facilitate tying in of the footpath to the adjoining area.

No lands are being permanently acquired at the front of the church.

As noted in section 5.5.2.1 of Chapter 5 of Volume 2 of the EIAR:

Any land temporarily acquired from a landowner will only be utilised for the purposes of undertaking boundary works or accommodation works related to the land in question.

Any lands acquired temporarily to facilitate construction work will be returned to landowners on completion of the works.

As part of the Accommodation Works process, final details of access arrangements to facilitate hearses and associated vehicles will be agreed between the Diocesan Trust / Parish Priest and the NTA.

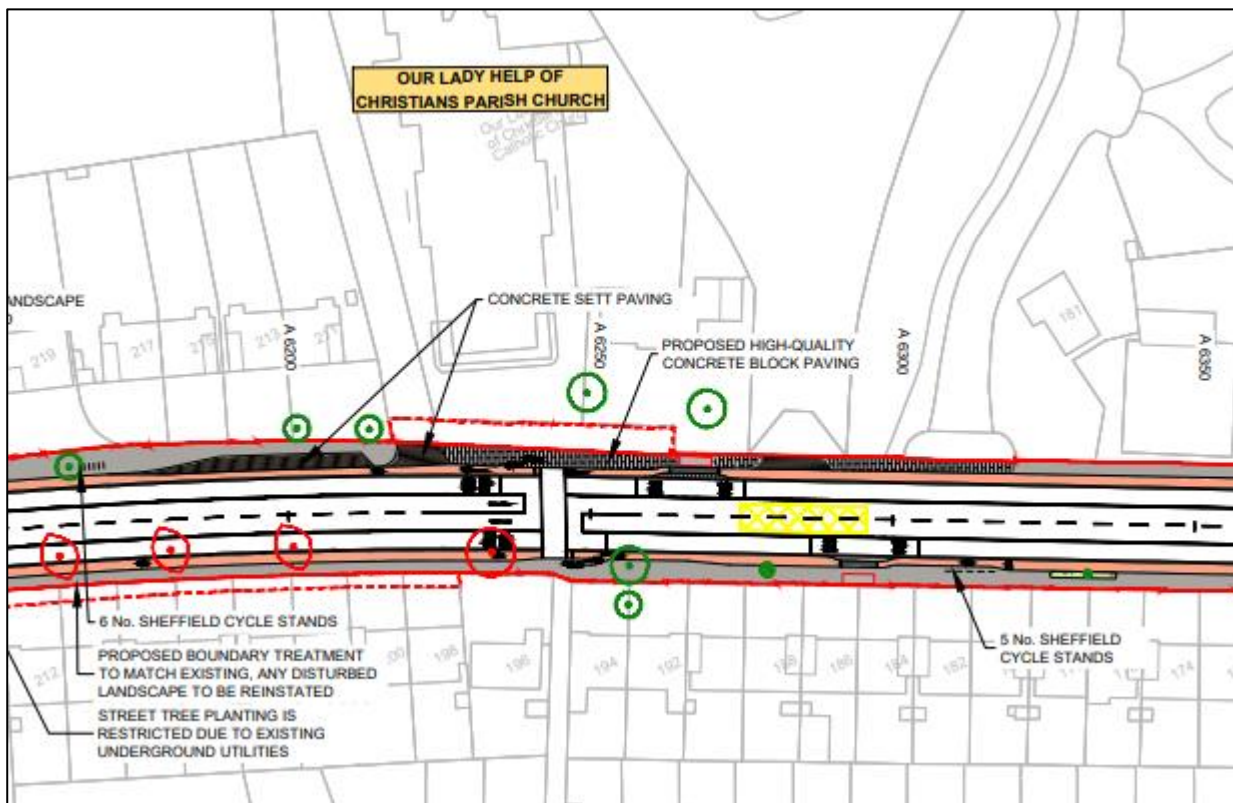


Figure 2.2.38: Extract from Landscaping General Arrangement Drawing at Our Lady Help of Christians Parish Church

As noted in section 5.5.3 of Chapter 5 of Volume 2 of the EIAR:

The Proposed Scheme will be constructed in a manner which will minimise, as much as practicable, any disturbance to residents, businesses and road users. Road and street upgrade works will be completed in a staged manner, as described in section 5.8.3, whereby traffic of all modes will be managed to ensure construction can continue while ensuring the safety of all road users, and personnel, and maintaining flow of all modes of traffic wherever practicable.

During the construction of the Proposed Scheme, there will be some temporary disruption to parking and access to the church. Arrangements will be made with the Diocesan Trust / Parish Priest to maintain continued access to the church, at all times, where practicable. Details regarding temporary access provisions will be discussed with the Diocesan Trust / Parish Priest prior to construction starting in the area.

Section 6.4.6.1.5.4 Parking and Loading of Chapter 6 Traffic and Transport of Volume 2 of the EIAR acknowledges the loss of parking along this section of the Navan Road and states:

There are 19 informal residential parking spaces located on the south side of R147 Navan Road, between Nephin Road and Baggot Road. These spaces are located between the existing cycle lane and the existing footway, to the east and west of the Navan Road filling station. It is proposed to remove all of these spaces, to allow the addition of a westbound bus lane in this location. All of the houses on this section have private driveways, generally with space for two vehicles. The impact of this change is considered to have a Negative, Slight and Long-term effect.

There are five informal general / residential parking spaces located on the north side of R147 Navan Road, to the west of Our Lady's Church, which has a private car park. Four of the informal spaces will be retained in the Proposed Scheme and will continue to be located between the cycle track and the footway. The impact of this change is considered to have a Negative, Slight and Long-term effect.

In accordance with Statutory Instrument S.I. No. 182/1997 - Road Traffic (Traffic and Parking) Regulations, 1997 Section 13 Driving on Footway, Section 14 Cycle Tracks and Section 32 Bus Lanes, a vehicle is allowed to be driven across the footpath, cycle track and bus lane for the purpose of access to or egress from an adjacent place / property.

2.2.3.13 Utility works

Summary of issue

Submissions stated that natural gas networks are being decommissioned all across Europe in favour of district heating networks to meet stringent climate change commitments.

Submissions also noted that ABP should insist on the proposed district heating network be installed as part of the BusConnects works, to avoid doubling the inconvenience to residents and businesses by separate road opening events.

Response to issue

It is not within the remit of the BusConnects scheme to install new utilities. As stated in section 1.2 of Chapter 1 Introduction of Volume 2 of the EIAR, *the aim of the Proposed Scheme is to provide enhanced walking, cycling and bus infrastructure on key access corridors in the Dublin region, which will enable and deliver efficient, safe, and integrated sustainable transport movement along these corridors.*

In addition, As noted in Section 21.6 of Chapter 21 in Volume 2 of the EIAR:

it is concluded that the Core Bus Corridor Infrastructure Works 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 Core Bus Corridor Infrastructure Works has the potential to reduce GHG emissions equivalent to the removal of approximately 105,500 and 102,200 car trips per weekday from the road network in 2028 and 2043 respectively. This represents a very 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) (DCCA 2021). It is concluded that, cumulatively, the Core Bus Corridor Infrastructure Works will make a significant contribution to carbon reduction.

2.2.3.14 Compulsory Purchase Order (CPO) Process

Summary of issue

Submissions stated that residents are unhappy with the explanation and communication they have received from the NTA as to why their property is identified for temporary or permanent land take. Submissions highlighted the solution, discussed in section 2.2.3.1 of this report, to remove the outbound bus lane between Nephin Road and Kempton Estate suggesting this would have a major impact on the amount of CPO necessary.

A submission stated that an audit should be undertaken on the CPO process, and to ensure that the CPO is carefully examined by An Bord Pleanála to ensure the proposed compulsory is necessary and to determine if it can be reduced in any places.

Submissions stated that the CPO will have significant impact on front gardens of residential homes, with one submission objecting to up to 80% of some gardens being removed.

Response to issue

Section 1.6.2 Emerging Preferred Route Option Consultation of Chapter 1 Introduction of Volume 2 of the EIAR states the following:

The EPR public consultation phase for the Proposed Scheme occurred from 14 November 2018 to 29 March 2019. The public were invited to make written submissions in relation to the published proposals to the BusConnects Infrastructure team either through an online form, by email or by post. There were two consultation events held in which the public were able to view the proposals and discuss them directly with members of the BusConnects Infrastructure team. These were held at The Crowne Plaza, Blanchardstown on Tuesday 15 January 2019 and at the Gresham Hotel, Upper O'Connell Street on 17 January 2019.

In addition to the open public consultation, a Community Forum was established with the aim of facilitating two-way communication between local communities and the BusConnects Infrastructure team.

Community Forum meetings took place on 12 December 2018 at the Crowne Plaza Hotel and 5 February 2019 at the Ashling Hotel. The meeting involved the presentation of an overview of the design for the Proposed Scheme and, with the use of an independent chairperson, the representatives were given the opportunity to ask questions of the BusConnects Infrastructure team and provide feedback.

In addition, there have been meetings held with residents' groups to provide updates on aspects of the Proposed Scheme. The BusConnects Infrastructure team has made the presentations given at the Community Forum and Residents Group meetings available to the public on the BusConnects website (www.busconnects.ie).

Letters were delivered to each individual potentially impacted property affected by the Proposed Scheme that, in addition to providing information about the Proposed Scheme, offered a one-to-one meeting to discuss the likely impact, issues and concerns. Each potentially impacted property was also sent a copy of the Emerging Preferred Route brochure for the Blanchardstown to City Centre Core Bus Corridor. Approximately 124 letters were delivered on 09 November 2018 along the Blanchardstown to City Centre Core Bus Corridor, with 20 property owners availing of the one-to-one meetings.

There were a total of 542 submissions made in respect of the Proposed Scheme during the Emerging Preferred Route public consultation phase.

Section 1.6.3 Preferred Route Option Consultations of Chapter 1 of the EIAR states:

1.6.3.1 Community Forum

A Community Forum meeting took place on 10 September 2019 at the Crowne Plaza Hotel for community representatives and public representatives. This Community Forum was held in advance of the launch of a second round of public consultation with the aim of keeping the public and their representatives updated on the design process between the first and second consultation. The meeting involved the presentation of an updated overview of the design for the Proposed Scheme, outlining several new design options being developed for consideration in specific areas where issues were identified following review of the submissions from the first non-statutory public consultation.

Again with the use of an independent chairperson, the community and public representatives were given the opportunity to ask questions of the BusConnects Infrastructure team and provide feedback

1.6.3.2 Preferred Route Option Consultation Overview

The PRO, or second round of, public consultation took place from 4 March 2020 to 17 April 2020. This second round of consultation accepted public submissions until 17 April 2020. The public were invited to make written submissions in relation to the published proposals to the BusConnects Infrastructure team either through an online form, by email or by post. Due to the COVID-19 pandemic all planned events scheduled after 12 March 2020 were cancelled. In deference to the submissions which had already been received, the decision was made not to cancel the consultation. However due to the introduction of COVID-19 public health restrictions further on-site or face-to-face public engagement was restricted.

Following the EPR submissions review of the proposals, there were some changes to the number of properties that were potentially impacted, and letters were prepared and delivered to properties either continuing to be potentially impacted; newly potentially impacted; or no-longer potentially impacted, with recipients invited to schedule meetings with the BusConnects Infrastructure team if they wished to discuss the proposals on an individual basis.

Consequently, presumably due to the COVID-19 impacts, there were just 49 submissions received relating to the Proposed Scheme, and only four landowner meetings were possible. The submissions ranged from individual submissions by residents, commuters and local representatives, to detailed proposals from various associations and private sector businesses.

Design development and planning for the Proposed Scheme continued and, the BusConnects Infrastructure team determined to run an additional round of public consultation in November 2020 to complete the non-statutory public engagement prior to finalising the PRO. The third round of public consultation took place from 4 November 2020 to 16 December 2020.

With the continuing effect of the COVID-19 pandemic and associated restrictions, the third Public Consultation was held largely virtually. A virtual consultation room for the Proposed Scheme was developed and virtual access to the room was facilitated. Along with offering a call back facility, the room provided a description of the Preferred Route from start to finish with supporting maps and included information of all revisions made, if any, since the previous rounds of public consultation as well as other supporting documents. Over the seven weeks of the consultation, 1,253 users visited the virtual consultation room for the Proposed Scheme. A third Community Forum virtual consultation call was also held on 17 November 2020 as part of the third round of non-statutory consultation.

As per the previous rounds, those properties continuing to be either potentially impacted; newly potentially impacted; or no-longer potentially impacted were written to directly to receive information on the consultation in advance of any wider publication of the proposals. One-to-one meetings were offered via Zoom or over the phone for those who wished to discuss the proposals further in relation to their own property with the minutes being recorded as part of the consultation process. Approximately 124 letters were sent on 2 March 2020 and approximately 4 one to one meetings took place during the second phase of public consultation. In addition, approximately 80 letters were sent between 1 and 3 November 2020 during the third phase of public consultation.

As per previous rounds the public were invited to make written submissions in relation to the published proposals to the BusConnects Infrastructure team either through an online form, by email or by post.

In addition, virtual meetings were resumed with residents' groups to provide updates on aspects of the Proposed Scheme. There were 583 submissions received over the second and third phases of public consultation (March/April 2020 and November/December 2020).

The issues raised during the third public consultation were considered in the further development of the PRO.

EIAR Chapter 4 Proposed Scheme Description, section 4.5.4.10 states that along the Navan Road permanent land take is required from properties to accommodate widening required for the Proposed Scheme, resulting in the need to relocate boundary walls and gates at these properties.

In this section temporary land take will be needed at these properties to construct new boundaries walls. Temporary land take is also required from properties to allow driveways and accesses to be regraded.

Section 10.4.4.1.2.1 Land Take of Chapter 10 Population of Volume 2 of the EIAR notes that *no residential properties are significantly impacted by land take during the Operational Phase.*

2.2.3.15 *Impact on property values*

Summary of issue

A number of submissions raised concerns regarding impacts on property values resulting from the permanent loss of land and wider scheme proposals.

Response to issue

The aim 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. The Proposed Scheme will greatly improve transport services for all that live along the route of the Proposed Scheme, including on Navan Road, by providing significantly improved sustainable transport options.

Furthermore, it is an objective of the Proposed Scheme to 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.

EIAR Chapter 10 ‘Population’ includes Appendix A10.2 ‘Economic Impact of the Core Bus Corridors’. Section 3 on page 14 of the appendix discusses the envisaged impact of the Proposed Scheme on property prices along the route. The conclusion reached is that in overall terms the public realm improvements planned by the NTA may in fact lead to an increase in value of both residential and retail property prices, especially in the community centres along the corridors.

The report notes:

“Evidence shows 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.”

and

“Residents along the corridors will also see a measurable increase in their quality of life, with evidence showing that residents are willing to pay more for an improved public realm.”

Based on the above text, it is believed that a combination of improved connectivity as a result of the dedicated public transport infrastructure being rolled out by the Proposed Scheme as well as public realm improvements, will not have a negative impact on values of residential properties on Navan Road.

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.

2.2.3.16 *Accommodation works*

Summary of issue

Submissions stated that replacement boundary walls and road frontage should be high quality, match existing and be designed to a specification aesthetically appropriate to the properties affected. Submissions also noted that gardens should be reinstated by a reputable landscape firm under the supervision of the NTA.

Response to issue

As noted in section 4.6.11.5.3 of Chapter 4 in Volume 2 of the EIAR:

“In general, property boundaries will be reinstated on a ‘like for like’ basis, including any walls, piers, fences, railings, gates, driveway finishes and private landscaping. Private grounds that are utilised in part for construction access will be reinstated following completion of the works to match the existing landscaping of the property. Where private grounds are reduced by permanent land take required for the scheme, the remaining grounds will be reinstated to match the landscape and character of the existing grounds in consultation with the property owner.”

2.3 Proposed Scheme on Old Cabra Road

2.3.1 Description of Proposed Scheme at this location

As stated in section 4.5.5.1 of Chapter 4 of Volume 2 of the EIAR, *the Proposed Scheme will limit the use of Old Cabra Road to local access traffic, buses, taxis and cyclists as follows:*

- *No through traffic in the southbound direction at the northern end of Old Cabra Road (at its junction with Navan Road), except for buses, taxis and cyclists, which precludes general traffic from Navan Road travelling to Stoneybatter along Old Cabra Road;*
- *No through traffic in the northbound direction except for buses, taxis and cyclists, due to proposed introduction of a Bus Gate at the railway overbridge on the Old Cabra Road, which precludes general traffic from Stoneybatter and the North Circular Road from travelling along Old Cabra Road through to Navan Road. Local traffic in the northbound direction will have access as far as the Bus Gate.*

On Old Cabra Road, the extent of the outbound bus lane will be limited to an approximate 110m section just south of the Navan Road junction. Glenbeigh Road / Old Cabra Road junction will become a signal-controlled junction, with the introduction of toucan crossings on the Old Cabra Road.

The Proposed Scheme will provide two one-way cycle tracks on each side of Old Cabra Road. The traffic lanes, bicycle infrastructure and footpaths will be accommodated within the existing road bridge width over the Heuston Station / Connolly Station railway line.

To provide an alternative route for general traffic to and from the City Centre (along Cabra Road, North Circular Road, Infirmary Road and Conyngham Road), the Cabra Road (Dalymount) / North Circular Road junction will be modified to allow right turns from Cabra Road (Dalymount) to North Circular Road and left turns from North Circular Road onto Cabra Road (Dalymount).

Extracts from General Arrangement Drawings which are provided as an appendix to Chapter 4 in Volume 3 of the EIAR are included below in Figure 2.3.1 to Figure 2.3.4.



Figure 2.3.3: Extract 3 from General Arrangement Drawing

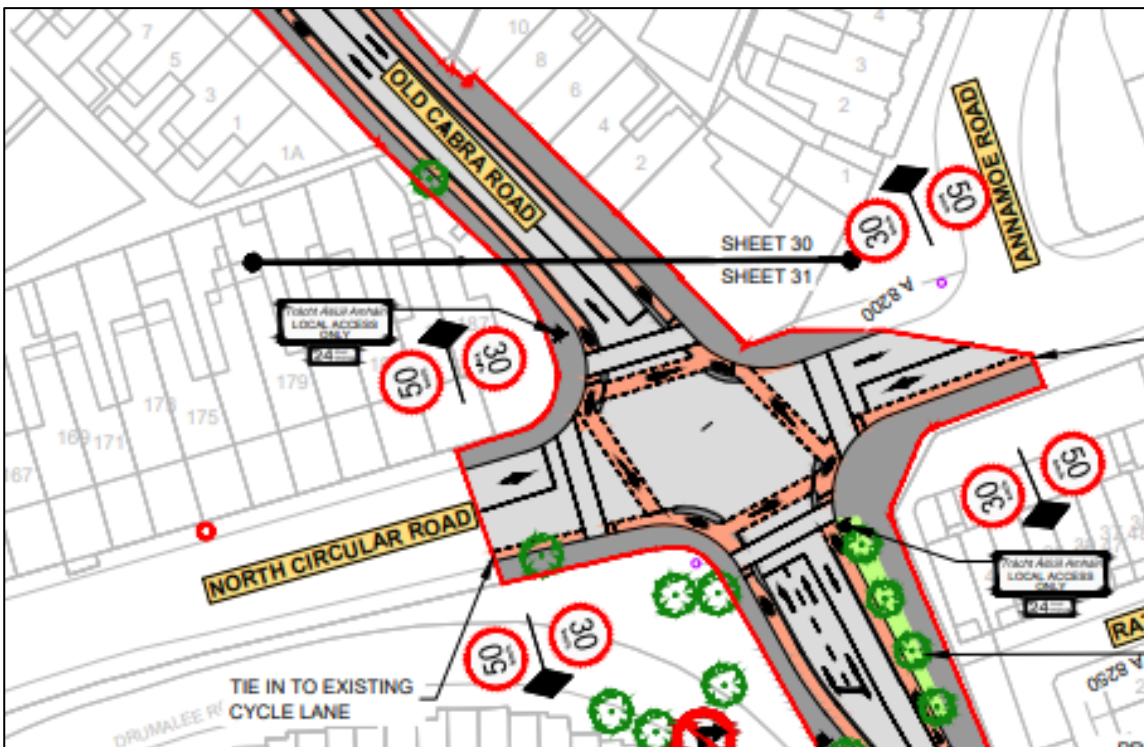


Figure 2.3.4: Extract 4 from General Arrangement Drawing

2.3.2 Overview of submissions received

As shown in Table 2.3.1 below, 25 submissions were made in relation to the Proposed Scheme in the Old Cabra Road area.

Table 2.3.1: Submissions made in respect of Old Cabra Road

No.	Name	No.	Name	No.	Name
18	Connecting Cabra	57	LCC Properties	89	Miriam O'Dwyer
23	Jeff Dalton & others	61	Lissan Coal Company	93	Paul O'Leary & Brian O'Hanlon
36	Senator Mary Fitzpatrick	62	David Little	96	Cllr. Cieran Perry
38	Brian Foley & Lorraine Rowland	67	Councillor Ray McAdam	97	Phibsboro Village Tidy Towns (PVT)
40	Thomas Good	68	Councillor Eimear McCormack	102	Clare Rudden & Richard Kinsella
42	Michael Hannon	79	Margaret Murray & others	113	Colette Timmons
43	Lorraine Hester	80	Deidre & Dermot Nagle	114	Catherine Tobin
44	John Higgins	83	Navan Road Community Council		
52	Orla Keane	88	Éamon Ó'Ceallaigh		

The key issues raised by the submissions relating to the Proposed Scheme at this location are as follows:

- Old Cabra Road Bus Gates
- Air Quality and Noise Pollution
- Safety

2.3.3 Common Issues Raised

2.3.3.1 Old Cabra Road Bus Gates

Summary of issue

Submissions raised concerns about the effect of the two bus gates on the surrounding road network i.e. Blackhorse Avenue, Baggot Road, Nephin Road, Skreen Road and Croagh Patrick Road. The submissions suggested that motorists will use surrounding roads to take short cuts which are not suitable for increased traffic and will impact on the safety of vulnerable road users.

A submission stated that the proposed measures are unnecessary and disproportionate, noting traffic congestion on Old Cabra Road is confined to morning peak time.

A submission stated that there does not appear to be any proposals to mitigate the effect of diversion of traffic away from Old Cabra Road.

A submission stated that the bus gates will act as a blockade to passing trade on Prussia Street, as Old Cabra Road currently is a gateway into Prussia Street.

A submission suggested time-plating the proposed bus gate as there are not traffic congestion issues at off-peak times.

Submission stated that these roads are unsuitable for increase in traffic and will damage the quality of life of residents in the affected areas. A submission also stated that Blackhorse Avenue is susceptible to flooding and this has not been considered in the plans. A submission also stated that some of these roads are not intended to carry heavy traffic due to poor road surfacing.

A submission proposed that ramps should be installed on Blackhorse Avenue to mitigate and reduce traffic flow on this road.

A submission affirmed that Glenbeigh Road will also be subject to additional traffic and should receive traffic calming measures.

Submissions also noted that some traffic will be diverted into Phoenix Park and questioned how to travel outbound from the city using their car, with the proposed restrictions in place. Another submission questioned how to access various local businesses such as Lidl and the GO petrol station on Old Cabra Road.

In addition, submissions stated that the removal of the Old Cabra Road as a through route will result in inbound traffic migrating to the Cabra Road which will negatively impact Navan Road, Cabra Road, North Circular Road and Phibsborough. Submissions stated that these roads and their junctions are already over capacity and that there is no provision in the BusConnects proposals to deal with this problem. Another submission questioned the results of the Local Area Model (LAM) particularly on Cabra Road where a reduction in traffic is forecast. A submission stated that the impact on vehicle journey times on routes that serve Phibsborough should be considered.

A submission requested that a detailed traffic analysis is completed to ensure the design is suitable.

A submission noted the importance of the Phibsborough area to residents of Kempton Avenue as it is home to many businesses and health professionals.

Submissions stated that the assessment makes no reference to the Phoenix Park planning that moves traffic out of the park and onto Blackhorse Avenue and Navan Road further increasing congestion.

Response to issue

Traffic Analysis

As noted in section 6.4.6.2.8.2 of Chapter 6 of Volume 2 of the EIAR, *to determine the potential 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 Transport Infrastructure Ireland's (TII) most recent Traffic and Transport Assessment Guidelines (TII 2014).*

This document is considered best practice guidance for the assessment of transport impacts related to changes in traffic flows due to proposed developments and is an appropriate means of assessing the impact of general traffic trip redistribution on the surrounding road network.

The Traffic Impact Assessment follows the Traffic and Transport Assessment Guidelines and offers an impartial description of the likely impacts of the Proposed Scheme, outlining both its positive and negative aspects. The Traffic Impact Assessment has been reported as part of the Environmental Impact Assessment for the Proposed Scheme.

It is noted in section 6.4.3 of Chapter 6 of Volume 2 of the EIAR that *for the qualitative analysis the assessment is in relation to the conditions of the existing transport network, which have been outlined in Section 6.3 (Baseline Environment) corresponding with a 'Do Nothing' scenario. As a result of the COVID-19 pandemic a number of temporary transport mobility measures have been implemented. Due to their temporary status, the measures are not considered a permanent long-term feature of the receiving environment and as such have not been considered in the impact assessments.*

Due to the Phoenix Park Transport Mobility and Options Study being temporary, it has not been included in the traffic analysis.

Tables 6.64 and 6.69 in Chapter 6 of Volume 2 of the EIAR forecast a reduction in general traffic flow along Cabra Road and North Circular Road at AM and PM peak hour respectively following the implementation of the Proposed Scheme. Thus, it is forecast that there will be a reduction in general traffic at the junction adjacent to St Peter's Church in the AM and PM peak hours, and on the approach to the Phibsborough Road junction, as a result of the Proposed Scheme.

Due to a reduction in forecasted traffic flows on Cabra Road and North Circular Road, these routes will offer a reasonable alternative journey time.

Access to the GO petrol station on Old Cabra Road will be available via Glenbeigh Road. Access to Lidl will also be available via Glenbeigh Road or northbound on Old Cabra Road.

The Proposed Scheme along the Old Cabra Road section includes operation of bus gates on a 24-hour all-day basis. Existing traffic flow levels on the corridor do not show a significant reduction in the middle of the day (relative to peak hours), and hence bus gate operation throughout the day is necessary to provide reliable bus journey times for all services. Although traffic levels reduce significantly in the overnight period, 24-hour bus gates are preferred in order to provide road users with a road layout and network which is consistent at all times – and hence can be easily understood and safely used by car drivers, pedestrians and cyclists. In addition, access to Old Cabra Road is not being closed to cars.

Blackhorse Avenue

The Proposed Scheme does not include any proposals to divert traffic from Prussia Street onto Blackhorse Avenue and onwards to Navan Road via Nephin Road. It is noted from Traffic Signs and Road Markings Drawings in Volume 3 of the EIAR, that proposed signs direct traffic to Navan Road via North Circular Road and Cabra Road, with the introduction of a new left turn at St Peter’s Church. Refer to Figure 2.3.5 and Figure 2.3.6.

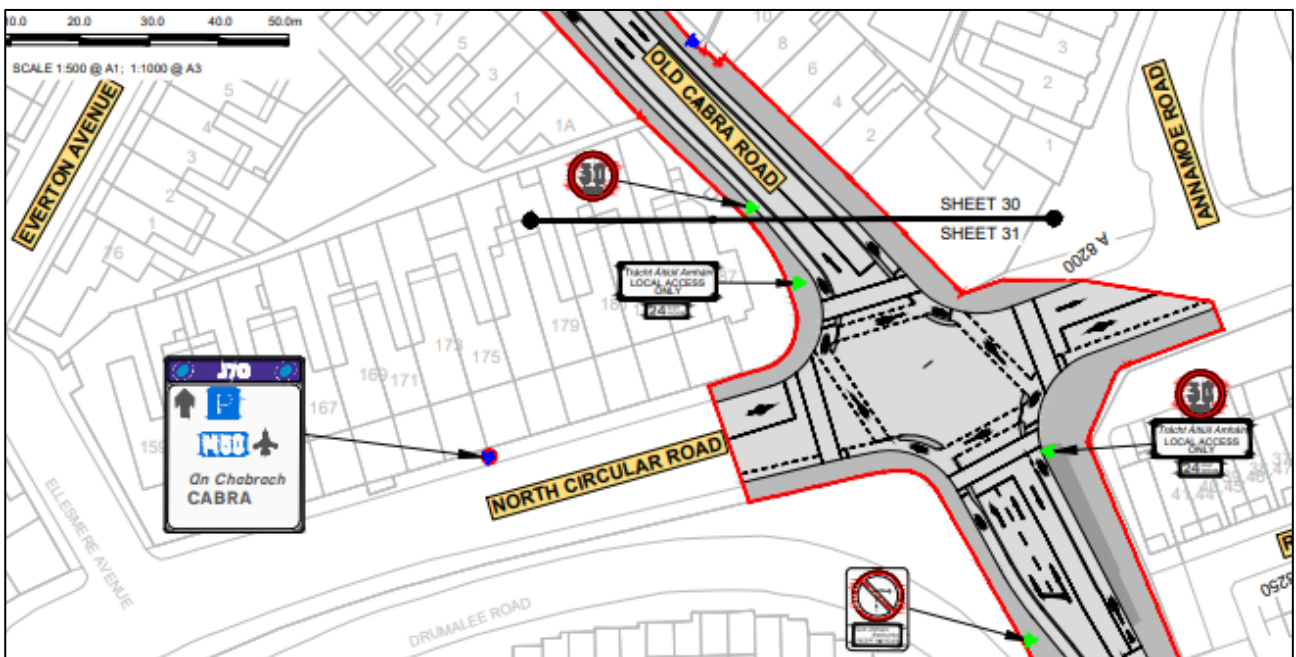


Figure 2.3.5: Extract 1 from Traffic Signs and Road Markings Drawings

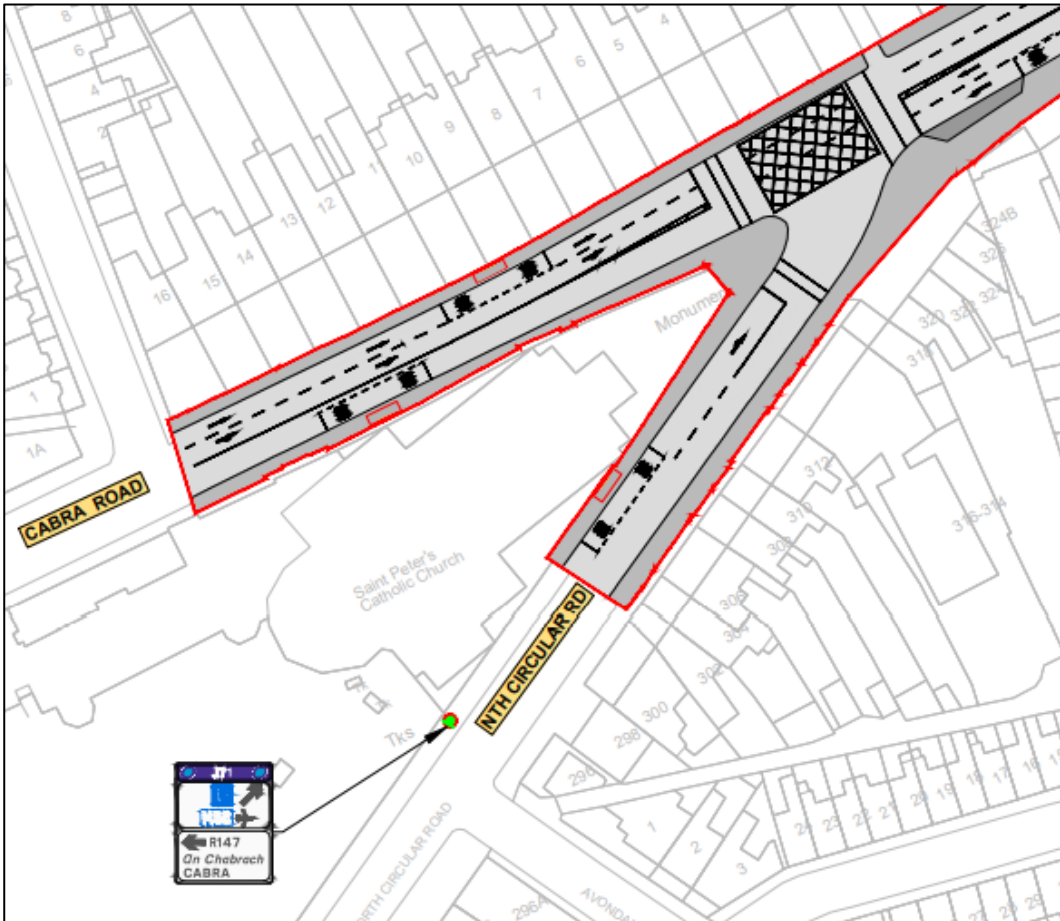


Figure 2.3.6: Extract 2 from Traffic Signs and Road Markings Drawings

As noted in table 6.64 of Chapter 6 Traffic Transport of the EIAR, at AM peak hour, two-way traffic is predicted to decrease as a result of the proposed scheme, resulting in a significant positive impact.

For the PM peak hour, as noted in table 6.69 of Chapter 6 Traffic Transport of the EIAR, two-way traffic is predicted to decrease as a result of the proposed scheme, resulting in a moderate positive impact.

As noted in table 6.70 of Chapter 6 Traffic Transport of the EIAR, at PM peak hour, traffic is predicted to increase by 219 PCU's per hour on a section midway along Blackhorse Avenue. In light of these increases and in line with the thresholds detailed in section 6.4.6.2.8.2 Significance of the General Traffic Impact – Diagram 6.48, further assessment has been undertaken by way of a traffic capacity analysis on the associated junctions along the affected links (see section 6.4.6.2.8.7 General Traffic Impact Assessment of Chapter 6). As noted in table 22 and table 23 in Appendix A6.4 Impact Assessments, the Significance of Effect at the various Blackhorse Avenue junctions, as a result of the Proposed Scheme, has been determined as “Not Significant” in relation to the Transport Impact Assessment.

Prussia Street

The transport assessment has indicated that on Prussia Street there would be a decrease of 856 vehicles per hour in the AM peak hour and a decrease of 926 vehicles per hour in the PM peak following the implementation of the proposed scheme. This information is set out in Table 6.62 and Table 6.67 in Chapter 6 of the EIAR.

Baggott Road

As noted in tables 6.64 and 6.70 of Chapter 6 of Volume 2 of the EIAR, at AM peak hour and PM peak hour, traffic is forecast to decrease as a result of the Proposed Scheme, resulting in a slight positive impact.

Nephin Road

The transport assessment forecasts that traffic flows on Nephin Road, due to the implementation of the Proposed Scheme, will be below the threshold of 100 vehicles per hour, which would be a very low level of change in traffic flow.

Skreen Road

The transport assessment has indicated that on Skreen Road there would be a decrease of 149 vehicles per hour in the AM peak hour and an increase of 147 vehicles per hour in the PM peak following the implementation of the proposed scheme. This information is set out in Table 6.64 and Table 6.70 in Chapter 6 of the EIAR. As noted in Table 22 and Table 23 in Appendix A6.4 Impact Assessments for PM peak hour, the Significance of Effect at the Skreen Road / Blackhorse Avenue junction, as a result of the Proposed Scheme, has been determined as “Not Significant” in relation to the Transport Impact Assessment.

Cabra Road, North Circular Road and Phibsborough

Tables 6.64 and 6.69 in Chapter 6 of Volume 2 of the EIAR indicate a reduction in general traffic flow along Cabra Road and North Circular Road at AM and PM peak hour respectively following the implementation of the Blanchardstown to City Centre Core Bus Corridor. It is forecast that there will be a reduction in general traffic at the junction adjacent to St Peter’s Church in the AM and PM peak hours, and on the approach to the Phibsborough Road junction, as a result of the Proposed Scheme.

It is noted that the modelled forecasts for the 2028 opening year indicate that one of the impacts of the proposed Blanchardstown to City Centre Core Bus Corridor Scheme is that there is a reduction of 14% in the number of people travelling via car along the Navan Road corridor towards the city centre at AM peak hour. Similarly, in the PM peak hour, there is a reduction of 18% in the number of people travelling via car, as shown in Figure 2.3.7 and Figure 2.3.8. This will reduce the overall traffic movement along the Navan Road – City Centre corridor.

Phoenix Park

The transport assessment has indicated that on Chesterfield Avenue (through Phoenix Park) there would be a decrease of 152 vehicles per hour in the AM peak hour and an increase of 215 vehicles per hour in the PM peak following the implementation of the Proposed Scheme. This information is set out in table 6.64 and table 6.70 in Chapter 6 Traffic and Transport of the EIAR.

As noted in table 22 and table 23 in Appendix A6.4 Impact Assessments for PM peak hour, the Significance of Effect at the Chesterfield Avenue/ Conyngham Road junction, Chesterfield Avenue/ Fountain Road junction, as a result of the Proposed Scheme, has been determined as “Not Significant” in relation to the Transport Impact Assessment.

The transport model indicates that flows along specific sections of Phoenix Park are forecast to decrease by 123 vehicles per hour on North Road and 152 vehicles per hour on Chesterfield Avenue at AM peak hour (refer to diagram 6.24 and table 6.64 of Chapter 6). In the PM peak hour, the transport model forecasts that a western section of North Road will have a decrease of 155 vehicles per hour and an eastern section of North Road will have an increase of 264 vehicles per hour, and an eastern section of Chesterfield Avenue will have an increase of 215 vehicles per hour (refer to diagram 6.25 and tables 6.69 and 6.70 of Chapter 6). As noted in table 22 and table 23 in Appendix A6.4 Impact Assessments, the Significance of Effect at the various North Road and Chesterfield Avenue junctions, as a result of the Proposed Scheme, is noted as Not Significant.

Croagh Patrick Road

The transport assessment forecasts that traffic flows on Croagh Patrick Road, due to the implementation of the Proposed Scheme, will be below the threshold of 100 vehicles per hour, which represents a very low level of change in traffic flow.

Glenbeigh Road

As noted in tables 6.64 and 6.69 of Chapter 6 Traffic and Transport, it is forecast that the Proposed Scheme will result in a reduction in traffic flow of 167 and 162 PCUs on Glenbeigh Road during the AM peak hour and PM peak hours respectively.

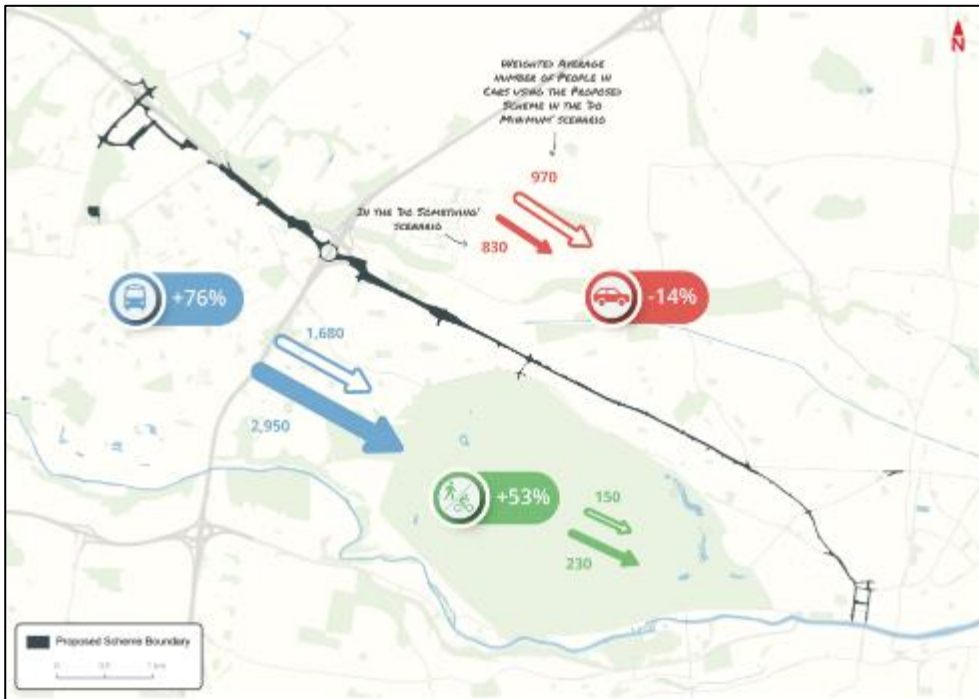


Figure 2.3.7: Extract of Diagram 6.5 People Movement by Mode travelling along the Proposed Scheme during 2028 AM Peak Hour

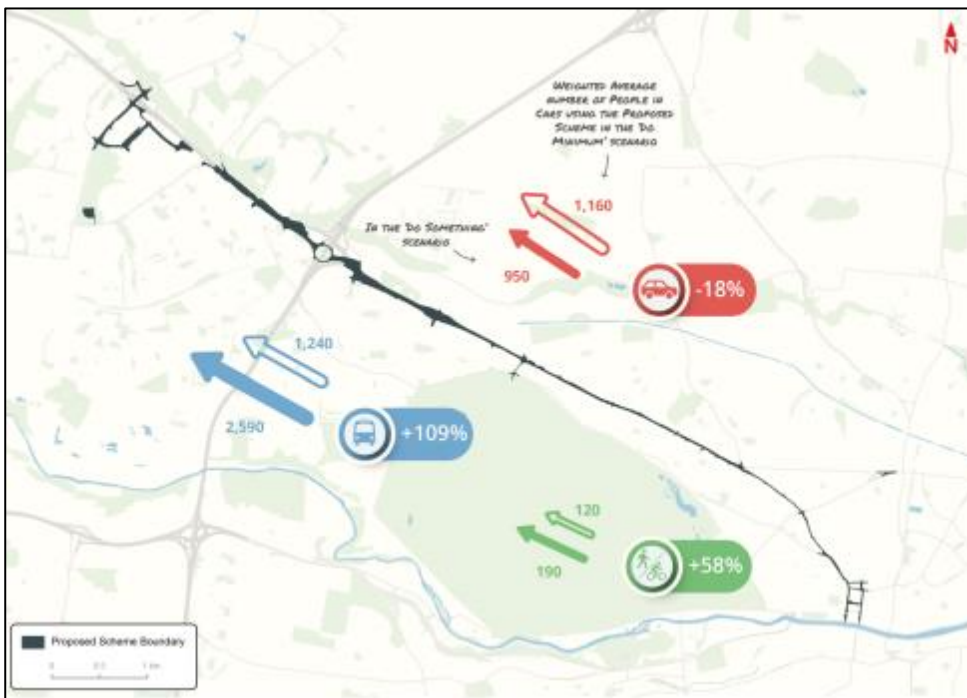


Figure 2.3.8: Extract of Diagram 6.6 People Movement by Mode travelling along the Proposed Scheme during 2028 PM Peak Hour

Overall, therefore, the Environmental Impact Assessment (Chapter 6) concludes *that the impact of the reduction in general traffic flows along the Proposed Scheme will be Positive, Significant and Long-term whilst the impact of the redistributed general traffic along the surrounding road network will be Negative, Slight and Long-term. It is concluded that there will be no significant deterioration in the general traffic environment in the study area as a consequence of meeting the scheme objectives of providing enhanced sustainable mode priority along the direct study area.*

2.3.3.2 Air Quality and Noise Pollution

Summary of issue

Submissions raised concerns that the increased traffic on the above-mentioned roads will result in increased air and noise pollution which will damage the quality of life of residents in the affected area.

Response to issue

Air Quality

In terms of operational impacts, 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.

Blackhorse Avenue and Nephin Road

- As shown on figure 7.3 of Volume 3 of the EIAR, the receptors in the Stoneybatter area will experience a negligible impact in terms of the annual mean NO₂ concentration.
- As shown on figure 7.4 of Volume 3 of the EIAR, the receptors in the Stoneybatter area will experience a negligible impact in terms of the annual mean PM₁₀ concentrations.
- As shown on figure 7.4 of Volume 3 of the EIAR, the receptors in the Stoneybatter area will experience a negligible impact in terms of the annual mean PM_{2.5} concentration.

Glenbeigh Road, Baggott Road, Croagh Patrick Road and Skreen Road

These roads were not modelled, as the predicted change in traffic volumes do not meet the criteria for detailed assessment, i.e., the annual average daily traffic (AADT) does not change by 1,000 or more.

Phoenix Park

- As shown on figure 7.3 of Volume 3 of the EIAR, the receptors in the Stoneybatter area will experience a negligible impact in terms of the annual mean NO₂ concentration.
- As shown on figure 7.4 of Volume 3 of the EIAR, the receptors in the Stoneybatter area will experience a negligible impact in terms of the annual mean PM₁₀ concentrations.
- As shown on figure 7.4 of Volume 3 of the EIAR, the receptors in the Stoneybatter area will experience a negligible impact in terms of the annual mean PM_{2.5} concentration.

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.

Noise Pollution

Section 9.4.4 of Chapter 9 'Noise and Vibration' of Volume 2 of the EIAR assesses the potential impacts of the Operational Phase on noise and vibration levels of the Proposed Scheme.

Blackhorse Avenue

As noted in figure 9.4 (Opening Year 2028 Traffic Noise Impact Summary) an Imperceptible/Positive to Slight impact is forecast and as noted in figure 9.5 (Design Year 2043 Traffic Noise Impact Summary) of Volume 3 of the EIAR, an Imperceptible/Positive to Not Significant impact is forecast, as a result of the Proposed Scheme.

Nephin Road

As noted in figure 9.4 (Opening Year 2028 Traffic Noise Impact Summary) an Imperceptible/Positive to Moderate impact is forecast and as noted in figure 9.5 (Design Year 2043 Traffic Noise Impact Summary) of Volume 3 of the EIAR, an Imperceptible/Positive impact to Slight impact is forecast, as a result of the Proposed Scheme.

Glenbeigh Road, Baggott Road, Croagh Patrick Road and Skreen Road

As noted in figure 9.4 (Opening Year 2028 Traffic Noise Impact Summary) and figure 9.5 (Design Year 2043 Traffic Noise Impact Summary) of Volume 3 of the EIAR, an Imperceptible/Positive impact is forecast, as a result of the Proposed Scheme.

Phoenix Park

As noted in figure 9.4 (Opening Year 2028 Traffic Noise Impact Summary) an Imperceptible/Positive to Slight-Moderate impact is forecast and as noted in figure 9.5 (Design Year 2043 Traffic Noise Impact Summary) of Volume 3 of the EIAR, an Imperceptible/Positive to Not Significant impact is forecast, as a result of the Proposed Scheme.

There are no significant residual Operational Phase noise or vibration impacts associated with the Proposed Scheme, whilst meeting the scheme objectives.

2.3.3.3 Safety

Summary of issue

The submissions raised concerns that the increased traffic on the above-mentioned roads will result in an increased risk of accidents to residents in the affected area.

Response to issue

The above-mentioned roads are forecast to either have a reduction in traffic volumes or a very low of change is forecast, apart from Skreen Road and a section of Blackhorse Avenue at PM peak hour, where the Significance of Effect at the relevant junctions, as a result of the Proposed Scheme, has been determined as “Not Significant” in relation to the Transport Impact Assessment.

Hence, it can be concluded that the road safety conditions for pedestrians, cyclists and other road users on local residential streets will not be significantly affected, as a result of the Proposed Scheme.

2.4 Proposed Scheme in Stoneybatter and adjacent streets

2.4.1 Description of Proposed Scheme at this location

As noted in section 4.5.5.1 of Chapter 4 of the EIAR:

On Prussia Street, between North Circular Road and the entrance to the Park Shopping Centre, the Proposed Scheme will provide:

- *One southbound general traffic lane;*
- *One northbound ‘straight-ahead only’ lane for local traffic, taxis and buses travelling to Old Cabra Road; and*
- *One left turn lane from Prussia Street to North Circular Road.*

Right turn movement from Prussia Street to North Circular Road will be removed.

The junction of Prussia Street and North Circular Road will be upgraded to a signalised junction to provide separate crossing facilities for cyclists and pedestrians, and to ban right turns from Prussia Street to minimise delay to buses travelling straight ahead (to Old Cabra Road). Along Prussia Street, a traffic lane will be provided in both directions, carrying buses and local traffic only. St Joseph’s Road will be modified to include a one-way section at its eastern end (i.e., one-way in an eastbound direction). This will restrict traffic using St Joseph’s Road as a means of avoiding the Bus Gate at Prussia Street / Manor Street junction. A short section of southbound cycle track will be provided on Prussia Street from its junction with North Circular Road before cyclists merge with general traffic just north of Park Shopping Centre. In the northbound direction, the cycle track will commence approximately 50m south of the junction with St Joseph’s Road.

At the junction of Manor Street / Prussia Street with Aughrim Street, the Proposed Scheme will provide the following:

- In the northbound direction, a Bus Gate will be located on Prussia Street just north of Aughrim Street junction, such that all northbound general traffic will be required to turn left onto Aughrim Street;*
- In the southbound direction, a Bus Gate will be located on Prussia Street / Manor Street just south of the Aughrim Street junction – and any general traffic travelling southbound on Prussia Street at this location will be required to turn right onto Aughrim Street;*
- The loading bay outside Kavanagh’s Public house will be retained.*

The Manor Street / Prussia Street / Aughrim Street junction will be modified to include a signal-controlled cycle crossing, along with urban realm improvements at this junction. The junction layout will include raised carriageway paving (i.e. raised table) to assist pedestrians crossing. The junction will include a southbound Bus Gate on Aughrim Street, preventing any general traffic from travelling from Aughrim Street onto Manor Street.

South of the Aughrim Street junction with Manor Street and Prussia Street, traffic signal controls will be included at the Manor Street / Kirwan Street / Manor Place staggered junction. The signal-controlled junction also includes a pedestrian crossing of Manor Street. Movements out of Kirwan Street will be restricted to left turn only, which will remain one-way westbound as at present. At the junction with Manor Street, Manor Place will be altered to a one-way street (i.e. one-way eastbound towards Manor Street), to limit use of Manor Place and Oxmantown Road by through traffic.

On Manor Street and Stoneybatter, the Proposed Scheme will provide two general traffic lanes and a cycle track in both directions to the junction with Brunswick Street North. The Proposed Scheme will provide protected parking bays on both sides of the road, and two loading bays.

In the northbound direction on Blackhall Place, the Proposed Scheme will provide a bus lane and a single general traffic lane, as far as the junction with King Street North. Northbound general traffic wishing to progress onto Manor Street will turn right onto King Street North (which will remain one-way eastbound), and then turn left onto George’s Lane to travel westbound along Brunswick Street North.

The Proposed Scheme will include signal-controlled priority for northbound buses at the Stoneybatter / Brunswick Street North junction. The Proposed Scheme will provide a cycle track in each direction along Brunswick Street North.

The Proposed Scheme will allow for general traffic exiting Arbour Hill to turn right only at the Stoneybatter junction. General traffic into Arbour Hill will be from Manor Street direction or Brunswick Street North only.

Extracts from General Arrangement Drawings which are provided as an appendix to Chapter 4 in Volume 3 of the EIAR are included below in Figure 2.4.1 to Figure 2.4.5.

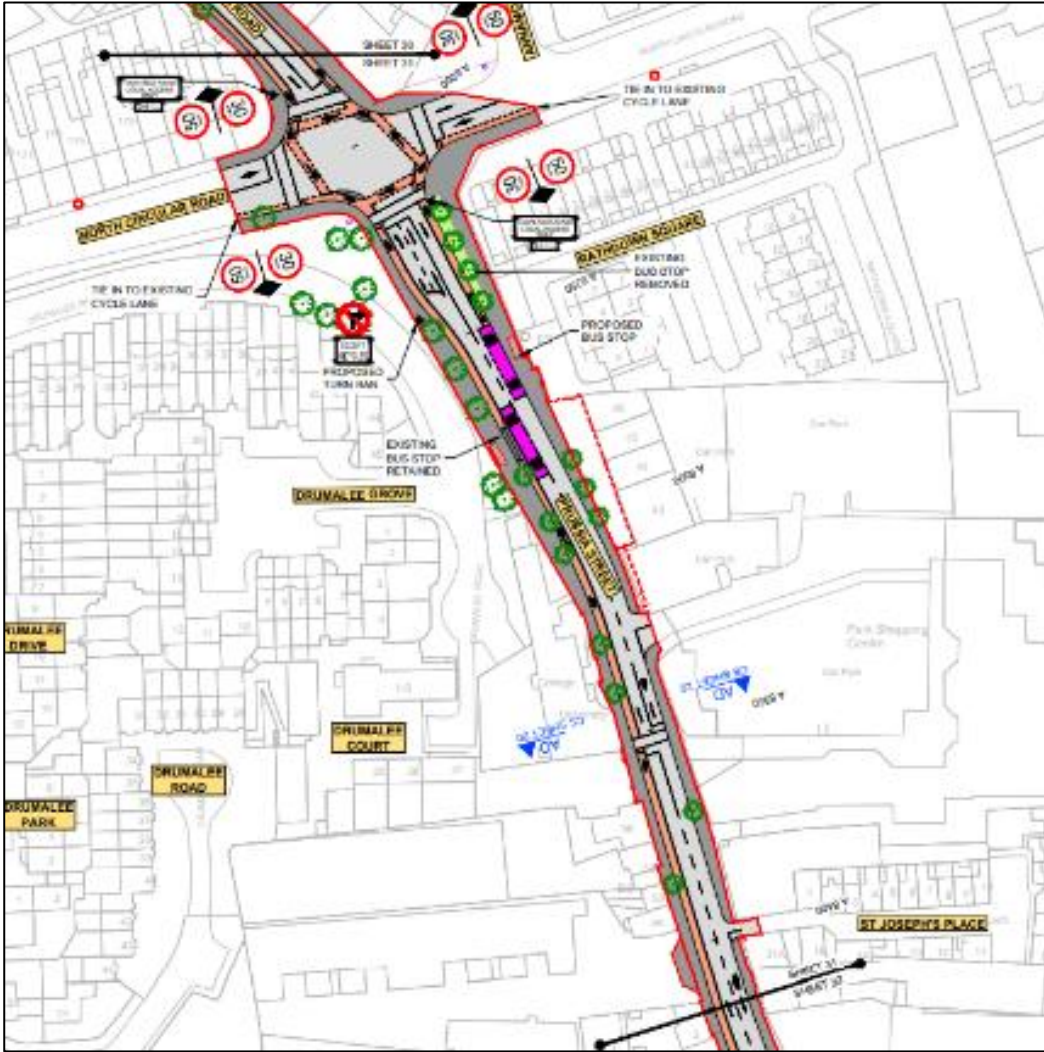


Figure 2.4.1: Extract 1 from General Arrangement Drawing

2.4.2 Overview of Submissions Received

As shown in Table 2.4.1 below, 17 submissions were made in relation to the Proposed Scheme at this location.

Table 2.4.1: Submissions made in respect of Stoneybatter and adjacent streets

No.	Name	No.	Name	No.	Name
3	Aughrim Street Residents Association	39	Miriam Gill	109	Stoneybatter Pride of Place
12	Brian Chadwick	65	Ciarán Mac Annraoi	117	Giuseppe Vani
13	Dr Lucy Chadwick	67	Councillor Ray McAdam	118	Frank Walsh & Anthony Malone
20	Dominic Cooney	79	Margaret Murray & others	120	James Ward
26	Donal Reilly & Collins Solicitor	85	Jennifer O'Brien & Antony Barta	122	Tesco Ireland Limited
36	Senator Mary Fitzpatrick	98	Prussia Street Traders		

The key issues raised by the submissions relating to the Proposed Scheme at this location are as follows:

- Impact on Prussia Street, Manor Street and Stoneybatter
- Removal of Parking and Loading Bays from Prussia Street, Manor Street, Stoneybatter and St Joseph's Road
- Impact on King Street North, George's Lane, Brunswick Street North and Kirwan Street
- Impact on Aughrim Street
- Impact on St Joseph's Road, Oxmantown Road, Cowper Street, Aughrim Place, Arbour Hill, Montpellier Hill and Infirmary Road
- Air Quality
- Road Safety
- Landscaping and Greening Stoneybatter
- Cycle Infrastructure
- Pedestrian Infrastructure
- Land ownership boundaries
- Alternative Options
- Access Routes
- Bus accessibility

2.4.3 Common Issues Raised

2.4.3.1 *Impact on Prussia Street, Manor Street and Stoneybatter*

Summary of issue:

Submissions stated that the proposals to make Prussia Street a 24/7 Bus Corridor is flawed, unnecessary and disproportionate resulting in a series of complex and possibly unenforceable traffic restrictions along with increased traffic and increased journey times which will inhibit local and visitor access to businesses and properties on these streets and create a series of rat-runs across a number of residential streets.

Particular concern was raised by residents of Fingal Place as to how they will access their homes. The submission also outlined that the Draft Dublin City Development Plan (2022-28) is proposing that Prussia Street be designated a Special Development and Regeneration Area (SDRA). It was suggested that turning Prussia Street into a 24/7 Bus Corridor is in direct conflict with this proposal and will impact negatively on the residential and commercial nature of the street.

A submission stated that Prussia Street is a retail centre which serves the surrounding areas, and the proposals will see it isolated due to traffic management proposals, which will destroy the businesses in the area. It stated that “local access only” for those accessing from North Circular Road onto both Prussia Street and Aughrim Street will destroy passing trade and deter regular customers. The submission added this would result in depreciation in capital value of the businesses on Prussia Street and will negatively impact on future leasing of business units at Park Shopping Centre. impact on customer, delivery and service vehicles accessing the Park Shopping Centre.

A submission stated that the Proposed Scheme will have a significant impact on customer, delivery and service vehicles accessing the Park Shopping Centre and stated it will result in longer and more HGV trips to and from the store. The submission also stated that there will be increased traffic on residential side streets to access the Park Shopping Centre. The submission goes on to state that alternative access to the Park Shopping Centre for deliveries are not practicable and are too narrow, and that it would not be possible to service Tesco Maple Centre and Tesco Prussia Street should the Proposed Scheme proceed as planned. The submission noted that the proposals will jeopardise the viability of the anchor tenants and smaller units within the Park Shopping Centre.

A submission stated that the Proposed Scheme is being treated like a “motorway for buses” as opposed to integrating it into the existing urban environment.

Submissions proposed a solution to lift out-of-peak restrictions on the bus gate on Manor Street and the bus corridor on Prussia Street which would help reduce much of the pressure on Aughrim Street, Prussia Street, Oxmantown Road and Kirwan Street and facilitate mobility for residents of Fingal Place, St Joseph’s Place and St Joseph’s Road. Submissions stated that this would allow normal commercial activity to take place in Stoneybatter village during the day and at weekends.

Submissions noted that lower volumes of general traffic and the lower number of buses will be running at off-peak time, and also noted that any congestion issues on Prussia Street are restricted to peak times.

It was also requested that consideration be given to reinstating parking on Prussia Street during non-peak hours, particularly if the bus gate can be lifted during these times.

A submission stated that there are no proposals to mitigate the effects of the diversion off traffic away from Prussia Street, Aughrim Street and Manor Street.

A submission stated that there is real concern that BusConnects in its present form will reduce Prussia Street, Manor Street and Stoneybatter to mere bus corridors, thereby ripping the heart from a thriving commercial village with 95 independent local businesses.

A submission questioned what impact analysis has been carried out to assess the impact of proposed changes to Stoneybatter.

A submission requested use of local resident tags to gain access via bus lanes to local shops and businesses, with another submission suggesting use of local electric shuttle buses to escort the public to local destinations in the Stoneybatter area as a result of the proposed traffic management measures.

Response to issue:

The effect of the proposed traffic management changes described in sections 2.3.1 and 2.4.1 will be to reduce the levels of general traffic along the route of the Proposed Scheme and improve bus journey times and reliability along the corridor.

Section 6.4.6.2.4 People Movement – Significance of Impact of Chapter 6 of Volume 2 of the EIAR states the following:

The significance of impact for the movement of People Movement by sustainable modes with the Proposed Scheme in place has been appraised as a qualitative assessment, taking into account the changes in mode share, demand changes by mode along the Proposed Scheme as well as bus usage presented above. The Proposed Scheme has been adjudged to deliver a Positive, Very Significant and Long-term effect in People Movement by sustainable modes. The Proposed Scheme can be shown to deliver significant improvements in people movement by sustainable modes along the corridor, particularly by bus, with reductions in car mode share due in part to the bus gate proposals and the enhanced sustainable mode provision. The findings of the People Movement assessment demonstrate that the Proposed Scheme aligns fully with the aims and objectives of the CBC Infrastructure Works, 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'.

Extracts from section 10.4.4.2.2.2. of Chapter 10 Population of Volume 2 of the EIAR notes:

Accessibility

Commercial accessibility relates to the ability of users and employees to access commercial businesses. The nature of the proposed works means accessibility impacts will differ based on the mode of travel used. The assessment has therefore separately assessed accessibility impacts on pedestrians, cyclists, bus users and private vehicles.

Chapter 6 (Traffic and Transport) assessed that people movement would significantly increase along the Proposed Scheme. It is therefore anticipated that all businesses along the Proposed Scheme will, to some extent, benefit from the increase in passing trade.

Prussia Street and Manor Street, as part of the Aughrim Street community area is expected to experience a Positive, Moderate to Very Significant and Long-term impact on pedestrians, a Positive, Slight to Very Significant and Long-Term impact on cyclists and a Positive, Moderate to Profound and Long-Term impact on bus users as a result of changes in access.

Further extracts from section 10.4.4.2.2.2. of Chapter 10 Population of Volume 2 of the EIAR states:

Private Vehicles

The most notable changes in accessibility for general traffic would occur at the location of the bus gates. This is the stretch of road between Navan Road / Old Cabra Road Junction and the overbridge on Old Cabra Road and at Manor Street / Prussia Street and Aughrim Street. The bus gates will prohibit non-residential access for private vehicles only permitting access to public transport, walkers and cyclists. The introduction of the proposed bus gates is expected to reduce passing trade for all businesses along the stretch of the bus gate, however the road will still be accessible to private vehicles.

The introduction of the bus gates at Manor Street / Prussia Street and Aughrim Street are expected to reduce through car traffic along Manor Street. These bus gates are located in the Aughrim Street community area. There are a large number of commercial businesses located on Manor Street. Access to these businesses will still be maintained via Manor Place, Kirwan Street, and northbound from Blackhall Place, via King St North, George's Lane and Brunswick St North. It is therefore expected that passing trade would be reduced for these businesses but not completely removed. As private vehicle access to these businesses will be maintained, there is not expected to be an impact on the ability of the business to operate. As the bus gate is located in the community area of Aughrim Street the impact on access to commercial businesses and employment locations for private vehicles in this community area is assessed to be Negative, Not Significant and Long Term during the operational phase.

This should be considered in conjunction with the positive impacts to pedestrians, cyclists and bus users from the Proposed Scheme which will facilitate greater capacity along the corridor for users of sustainable modes of transport to access the commercial properties. Furthermore, an overall assessment of ‘The Economic Impact of the Core Bus Corridors’ is included in Appendix A10.2. The assessment indicates that evidence from case studies suggests that, in some cases, businesses overestimate the number of people arriving by car whilst the proposed enhancements to the walking, cycling and bus infrastructure along the route will increase use of sustainable transport and may positively impact on footfall to the business.

There is strong international evidence to suggest that the proposed improvements will lead to further increases in the use of sustainable transport. This should, in turn, more than compensate for reductions in visits by car users. Whilst spend per visitor may fall slightly, the overall spend rises due to the increased overall footfall. This effect should occur as soon as the new proposed routes open with shoppers choosing to make even more use of sustainable transport decisions. Whilst there is limited evidence of the impact during the construction work, none of the evidence suggested an increase in business insolvency or a departure of businesses from the area during construction works.

The Proposed Scheme along the Old Cabra Road / Prussia Street / Manor Street section includes operation of bus gates on a 24-hour all-day basis. Existing traffic flow levels on the corridor do not show a significant reduction in the middle of the day (relative to peak hours), and hence bus gate operation throughout the day is necessary to provide reliable bus journey times for all services. Although traffic levels reduce significantly in the overnight period, 24-hour bus gates are preferred in order to provide road users with a road layout and network which is consistent at all times – and hence can be easily understood and safely used by car drivers, pedestrians and cyclists. In addition, access to Prussia Street is not being closed to cars.

It is also relevant to note that although a bus gate will prevent general traffic movement between Prussia Street and Manor Street, this does not preclude access by car and other traffic. Access from the south will be available via Brunswick Street North, and from the north either via Infirmary Road / North Quays or via local streets such as Oxmantown Road – and transport modelling indicates that flows on Manor Street / Stoneybatter will be at around 150 vehicles per hour at peak times.

Due to the introduction of the bus gates on Old Cabra Road, to provide an alternative route for general traffic to and from the City Centre (along Cabra Road, North Circular Road, Infirmary Road and Conyngham Road), the Cabra Road (Dalymount) / North Circular Road junction will be modified to allow right turns from Cabra Road (Dalymount) to North Circular Road and left turns from North Circular Road onto Cabra Road (Dalymount).

Access to the North Circular Road from the Stoneybatter area will be available via Aughrim Street or Prussia Street (left turn only onto North Circular Road).

Access to Fingal Place and St Joseph’s Place by private vehicle from the north as a result of the proposed scheme will be via North Circular Road and Prussia Street. From the southern side access can be gained by travelling along Manor Street, Aughrim Street, St Joseph’s Road and Prussia Street.

Those exiting St Joseph’s Place or Fingal Place by private car can access North Circular Road via Prussia Street (turning left only onto North Circular Road) or via Aughrim Street.

Access to St Joseph’s Road from the south as a result of the Proposed Scheme will be via Aughrim Street.

Access to Grangegorman Lower from Arbour Hill will be available via King Street North and George’s Lane. Access to Prussia Street from Arbour Hill will still be available via the surrounding road network, such as King Street North and northbound via Brunswick Street North and Aughrim Street, or via Manor Place as a left turn from Manor Place onto Manor Street will be permitted.

Access to Rathdown Road from Prussia Street will be available via Aughrim Street and North Circular Road.

Access from Grangegorman Lower to Prussia Street under the Proposed Scheme will require travelling southbound on Manor Street and then onwards via King Street North, George’s Lane, Brunswick Street North, northbound on Manor Street and onwards via Aughrim Street. The return journey will require travelling via Aughrim Street, Cowper Street, Oxmantown Road, Manor Place, Manor Street and onwards via King Street North.

Furthermore, during overnight periods, these alternative traffic routes will be uncongested and hence will provide reasonable journey times by car.

Overall therefore, operation of bus gates for 24 hours is considered the most appropriate means to achieve the scheme objectives and a safe environment for all road users, while also providing vehicle drivers with safe and practical alternative routes.

Prussia Street was added to one of the Strategic Development Regeneration Areas (SDRA) of the Dublin City Development Plan (2022-28) as an amendment to the original extent of the SDRA. This amendment was not introduced until 27/07/2022 which was after the planning application for the Blanchardstown to City Centre Core Bus Corridor scheme was submitted.

It is also noted that one of the overarching principles of SDRAs is as follows:

Access and Permeability: *Development proposals should ensure adequate permeability and connectivity to surrounding neighbourhoods and public transport infrastructure through the provision of high quality, accessible public realm and high quality walking and cycling infrastructure. Access and layout should accord with the principles of DMURS.*

The Proposed Scheme does not conflict with this overarching principle and in fact supports it by providing high quality public transport, cycling and walking connections.

As noted in section 7.4.3.3 of Chapter 7 Air Quality, *in accordance with the EPA Guidelines (EPA 2022) the impacts associated with the Operational Phase traffic emissions pre-mitigation are overall neutral and long-term.*

As noted in section 4.5.5.9 Landscape and Urban Realm of Chapter 4 of Volume 2 of the EIAR:

The Proposed Scheme will introduce traffic management measures that will substantially reduce through traffic at Stoneybatter and provide opportunities to further develop the public realm to create an even stronger pedestrian priority urban neighbourhood character.

The carriageway width will be reduced in many locations and the footpaths widened to match the existing urban realm works. New and upgraded bus stops will be installed and continuous cycle tracks will be provided on both sides of the street. The junction at Aughrim Street will be reduced to a single lane only and the existing public spaces either side of the junction will be extended and further developed to increase the public amenity value of these spaces. The existing mature trees will be retained, and the revised layout will facilitate planting of additional new trees and other landscaping.

Along the main streetscape, the existing established urban realm will be extended to incorporate wider footpaths and new cycle tracks.

Refer to Figure 2.4.7 which illustrates the proposed urban realm at Stoneybatter Village.



Figure 2.4.6: Stoneybatter Village

Extracts from Figure 17.2 from Volume 3 of the EIAR are included below in Figure 2.4.7 and Figure 2.4.8



Figure 2.4.7: Stoneybatter View from Manor Street at Aughrim Street, Existing Situation



Figure 2.4.8: Stoneybatter View from Manor Street at Aughrim Street, Post-implementation of the Proposed Scheme

As noted in 17.5.2.1 of Chapter 17 Landscape and Visual of Volume 2 of the EIAR, Figure 2.4.9 above shows the proposed view from the northeast side of Manor Street looking northwest along the road towards the junction with Aughrim Street. The primary changes in the view are the changes to the road layout, introduction of a new planted median, resurfacing of the road with buff coloured asphalt, an increase in the extents of the landscaped areas and planting types, and introduction of new street tree planting throughout the view. The existing trees are retained and there is a notable improvement in the appearance of the urban realm. There would be a substantial positive change in the character and visual amenity of the view.

Extracts from Figure 17.2 from Volume 3 of the EIAR are included below in Figure 2.4.9 and Figure 2.4.10.



Figure 2.4.9: View from Manor Street at Shea's Lane, Existing Situation



Figure 2.4.10: View from Manor Street at Shea's Lane, Post-implementation of the Proposed Scheme

As noted in 17.5.2.1 of Chapter 17 Landscape and Visual of Volume 2 of the EIAR, Figure 2.4.11 above shows the proposed view from Manor Street at the junction with Shea's Lane looking southeast along the road. The primary changes in the view are the narrowing of the road, the introduction of new street trees to the far (southwest) side of the road, the introduction of new segregated cycle tracks and the removal of on street parking bays. Footpaths to both sides of the road are widened and resurfaced in concrete block paving. The existing trees are retained to the left side of the road. There is a notable improvement in the appearance of the urban realm mainly due to the reduction of visual clutter and the introduction of new street trees.

There would be a substantial positive change in the character and visual amenity of the view.

The traffic impact on residential side streets in the area are considered in sections 2.4.3.3 to 2.4.3.5 of this report, and in section 2.2.3 of this report.

2.4.3.2 Removal of Parking and Loading Bays from Prussia Street, Manor Street, Stoneybatter and St Joseph's Road

Summary of issue:

A submission stated that at least 78% of existing car-parking spaces will be removed from Prussia Street and Manor Street, noting removal of 36 spaces from west side and 41 spaces from east side. The submission also stated that a total of 17 parking spaces will be retained.

Submissions stated that the removal of parking will have significant adverse impact on local businesses.

Submissions also stated that the number of loading bays on Manor Street will be reduced to three, noting that the proposal includes an area outside Centra supermarket which includes an area taken in charge to extend footpath and there is currently bike parking there also. Submissions noted this will create difficulties for local businesses, and the proposals threaten their existence.

A submission stated that the issue of loading bays and deliveries is an issue that needs to be addressed in tandem with Dublin City Council, including incentivising deliveries outside core hours, enforcement of time zoning.

Submissions requested reinstatement of parking on Prussia Street during non-peak hours.

A submission also noted that there are a number of residents with disabilities on Manor Street and Prussia Street who need access to cars.

A submission expressed concerns that two parking spaces will be removed from Joseph's Road, including the electric car charging point, and the change would block access to rear of 67 Prussia Street.

A submission objected to removal of parking adjacent to Kavanagh's Pub and removal of the link road between Aughrim Street and Prussia Street, due to impact on adjacent business, noting area is also used for loading. The submission stated that removal of frontage will prevent loading and remove parking used by the family.

Submissions affirmed that to state that there is available parking on side streets is not acceptable, as residents and shoppers require parking near homes and shops and questioned where they will park as many residents already have parking permits for St Joseph's Road.

A submission questioned if the impact on surrounding streets has been considered as extra cars will be parking on them, and a submission recommended that given the width of the proposed road, there is no need to remove all the parking spaces.

Response to issue

As noted in section 6.4.6.1.1.4 of Chapter 6 of Volume 2 of the EIAR, the potential impacts of the Proposed Scheme on parking and loading provision have been assessed through a comparison of the availability of spaces or lengths of bay in the Do Minimum and Do Something scenarios. The assessment considers the impact of any changes on the general availability of parking and loading in the vicinity of the Proposed Scheme.

This qualitative assessment has also taken into account nearby parking, which is defined as alternative parking locations along side roads within 200 – 250m of the Proposed Scheme.

As noted in section 6.4.6.1.6.4 of Chapter 6 Traffic and Transport of Volume 2 of the EIAR:

There are currently ten pay & display / permit spaces on the east side of the R805 Prussia Street, to the north and south of St Joseph's Road. Under the proposals these spaces would be removed. In total, there are currently 125 spaces of the same type within 200m. The impact of this loss is assessed as having a Negative, Slight and Long-term effect.

There is currently a total of 58 pay & display / permit spaces on Manor Street between Aughrim Street and Brunswick Street North. These are located on both sides of the road in parallel bays.

Under the proposals, the existing 58 spaces within the red line boundary would be reduced to 16 pay & display / permit spaces, plus two disabled spaces as existing. One space will also be removed on Manor Place. It is anticipated that improved enforcement, and turnover of the remaining parking spaces, together with continued occasional use of pay & display parking on side streets such as Aughrim Street, Kirwan Street and Manor Place (where there are approximately 100 pay & display / permit spaces within 200m of Manor Street), will partially mitigate this impact. However, the overall impact of this loss of 42 spaces and one on Manor Place is assessed as a having a Negative, Moderate and Long-term effect.

On Manor Street's southern section and along Stoneybatter, alongside the northbound lane, there is currently space along the kerb to allow vehicles to park for part of the day only, located directly along an advisory cycle lane (northbound). These spaces are only theoretically available from 10.00 to midday (due to the Clearway regulation from 07.00 to 10.00 and 12.00 to 19.00) – and hence their removal to allow for provision of a northbound off-road cycle track will have minimal impact on overall parking supply, and hence has not been included in the assessment of parking impact.

There are currently four loading spaces on Manor Street between Brunswick Street North and Aughrim Street, two single bays on the west side, and one two-space bay on the east side. It is proposed to provide two loading bays with space for five vehicles on the east side of Stoneybatter, immediately to the north of Brunswick Street North. The bays on the west side would be removed to make space for the proposed northbound cycle track. The resultant increase of one loading spaces is considered to be a Positive, Slight and Long-term impact

There is a further loading bay (2 spaces) located on the southern end of Aughrim Street at the junction with Manor Street. This will be retained.

There are 11 pay & display / permit spaces on Aughrim Street, located in a triangle of lane between Aughrim Street and Manor Place. Under the proposals these spaces would be removed to allow the re-modelling of the Manor Place / Aughrim Street junction, and the creation of associated public realm. As a stand-alone change, this is considered to be a slight impact, but when considered with the loss of spaces on Manor Street, the scale of the parking loss is assessed as Negative, Moderate and Long-term impact.

The contents of table 6.47 in Chapter 6 of Volume 2 of the EIAR (reproduced in Table 2.4.2 below), presents a summary of the parking and loading spaces between Navan Road / Old Cabra Road junction to Ellis Quay for the Do Minimum and Do Something scenarios.

Table 2.4.2: Navan Road / Old Cabra Road Junction to Ellis Quay - Change in Parking Provision

		Do Minimum	Do Something	Change
Prussia Street (between Manor Street & North Circular Road)	Designated Paid / Permit	10	0	-10
Manor Street / Stoneybatter (between Arbour Place & Aughrim Street)	Designated Paid / Permit	58	16	-42
	Disabled	2	2	0
	Loading Bays	4	5	1
Aughrim Street / Manor Street junction	Designated Paid / Permit	11	0	-11
	Loading Bays	2	2	0
Manor Place	Designated Paid / Permit	1	0	-1
Blackhall Place (between King Street North & Benburb Street)	Designated Paid / Permit	26	12	-14
Queen St	Designated Paid Parking and Permit Parking	3	0	-3
Brunswick Street North	Designated Paid / Permit	6	0	-6
	Loading Bays	2	0	-2
King Street North	Loading Bays	0	3	3
Blackhall Street	Designated Parking	19	30	11
	Loading Bays	1	1	0
Total		145	71	-74

As shown in Table 2.4.2 above, the proposed amendments to parking / loading will result in a loss of 74 spaces along this section.

The overall significance of effect (for the section from Navan Road / Old Cabra Road junction to the Quays) is assessed as Negative, Moderate and Long-term, primarily as a result of the designated paid spaces lost on Manor Street. This moderate effect is considered acceptable in the context of the planned outcome of the Proposed Scheme, which is to improve accessibility to this local area (on foot, by bicycle and bus) for residents and visitors to local shops and businesses.

There will be no impact to the existing parking arrangements on St Joseph’s Road, and the adjacent access to rear of 67 Prussia Street.

It is further noted that there are 16 Sheffield cycle stands proposed on Prussia Street and 27 proposed on Manor Street, giving a total of 86 spaces for bicycles, which is an increase with respect to existing provision and will facilitate those accessing the area by bicycle.

2.4.3.3 Impact on King Street North, George’s Lane, Brunswick Street North and Kirwan Street
Summary of issue:

Submissions stated that a complex diversion system at the lower end of Stoneybatter through King North Street, George’s Lane and along Brunswick Street North/Kirwan Street is a concern for residents and businesses alike. It also noted that there was considerable enthusiasm for the original proposal for a cycle/pedestrianised area on Brunswick Street North, and noted that Brunswick Street North attracts a significant number of schoolchildren and will also attract more pedestrians due to TU Dublin at Grangegorman.

A submission noted that there is no frontage to properties on Brunswick Street North and it has narrow footpaths.

A submission noted that there is no justification for this as there is no traffic congestion in the area.

Walsh’s Pub have expressed concern as to how they will manage deliveries to their cellar, which is located on Brunswick Street North.

A submission also raised concerns from residents and groups at King Street North including Slí An Chroí, the SPADE Enterprise Centre and the North West Inner City Network about the impact of diverting traffic along King Street North and George's Lane. The SPADE centre is an old church dating back to the late eighteenth century and there is a residential house in the grounds from the same period. They are concerned that these diversions will cut off the two villages of Stoneybatter and Smithfield.

A submission is concerned about the proposal to allow traffic to turn onto Grangegorman Lower from George's Lane, to then access Kirwan Street. It also noted that the Filtered Permeability scheme at Grangegorman has changed traffic flow and parking demand on Kirwan Street. The submission acknowledged that the right-turn ban at the junction of Kirwan Street and Manor Street will be beneficial in restricting general traffic using Kirwan Street as a main route out of the City. However, the submission stated that this will make it difficult for Kirwan Street residents to access the Phoenix Park, Park Shopping Centre or to travel in a northbound direction.

A submission proposed that the bus gate at King Street North be replaced with a bus priority system at Blackhall Place to avoid the need for diversions along King Street North and Brunswick Street North. This would also allow the restoration of the proposal for a cycle lane/pedestrian zone on Brunswick Street North. If this solution is not considered viable, the submission proposed an alternative to lift the bus gate at Blackhall Street/King Street North during off-peak hours. Another submission stated that there is no reason to close off access to Brunswick Street North from Stoneybatter.

Response to issue:

The proposed outbound bus gate at Blackhall Place / King Street North junction will discourage outbound general traffic from using Manor Street as a through-route.

In addition, the proposed signal-controlled outbound bus priority at Stoneybatter / Brunswick Street North junction will provide priority for buses in the Stoneybatter village area, while providing wider footpaths, cycle tracks and reducing overall general traffic in this area.

As noted in Chapter 3 Reasonable Alternatives of Volume 2 of the EIAR, following the Emerging Preferred Route consultation, the design was further developed through to the Preferred Route Option.

As noted in section 6.3.3.2 of Preferred Route Option Report of the Supplementary Information, three alternative options were assessed for the section between Stoneybatter / Brunswick Street North junction to Ellis Quay as follows:

Option BK1: *Option BK1 consists of a full bus lane in both directions on Blackhall Place to Ellis Quay, with inbound general traffic diverted from the bus corridor to King Street North. Northbound general traffic would be accommodated on Blackhall Place alongside a bus lane. A quiet street treatment is proposed for Brunswick Street North, and a two-way cycle track is proposed via Brunswick Street North, George's Lane and Queen Street.*

Option BK2: *EPR Option BK2 consists of a Bus Priority signal for inbound movements from Stoneybatter at Brunswick Street North, with general traffic diverted onto Brunswick Street North and King Street North. Full bus lanes would be provided in both directions on Blackhall Place to Ellis Quay. would become a two-way street for general traffic. A two-way cycle track is proposed to Ellis Quay.*

Option BK3: *Option BK3 consists of a bus lane in both directions on Blackhall Place to Ellis Quay, with inbound and outbound general traffic all turning into King Street North. Northbound general traffic bound for Stoneybatter / Manor Street would be accommodated via George's Lane and Brunswick Street North (which would be northbound and westbound one-way streets respectively). Two one-way cycle tracks are proposed on Brunswick Street North leading to a two-way cycle track along George's Lane and Queen Street.*

In terms of capital cost, Option BK2 is marginally more expensive due to the road widening on George's lane. Option BK3 is marginally the cheapest option of the three.

In terms of transport quality and reliability, Option BK3 performs better due to the bus priority signal on Stoneybatter providing an efficient means to ensure outbound buses are able to travel unhindered by congestion through Stoneybatter. In particular, northbound through traffic can be effectively capped by limiting green signal time for general traffic movements from Brunswick Street North to Stoneybatter.

All options serve the same catchments and as such are ranked equally in relation to land use policy and residential population and employment catchments.

In terms of cycle network integration, all options provide high quality cycle facilities parallel to the CBC along Brunswick Street North, George's Lane and Queen Street (which forms part of the GDA Cycle Network Plan Primary Route 4D). BK1 and BK3 perform better due to the continuous two-way track on Brunswick Street North and George's Lane.

In terms of transport network integration, all three options require a change in traffic movements from the existing situation. In terms of traffic network integration BK1 performs better than BK2 and BK3 due to the simpler traffic management (with less traffic conflicts) at George's Lane / Queen Street and Blackhall Place/King Street North.

All options rank equally under accessibility and social inclusion as they all follow the same route. Option BK3 performs better for safety due to a rationalisation of general traffic and bus movements at Blackhall Place/King Street North (such that only buses can travel directly north, and all general traffic must turn right on to King Street North). All options rank equally in the environment criteria - as Option BK2 encroaches on public realm at George's Lane, while BK1 has a beneficial provision of Quiet Street treatment at Brunswick Street North, while BK3 provides more scope for public realm with wider footpaths on Manor Street / Stoneybatter, and with a lesser road width on George's Lane.

Based on the assessment undertaken, route Option BK3 offers more benefits over the other options. Option BK3 is the preferred option for the following reasons:

- For economy, it provides reliable bus priority by traffic signal control (and limitation) of through traffic at Blackhall Place. For integration, it provides a continuous high-quality cycle facility from Manor Street through to Queen Street.*
- For safety, it provides safe facilities for pedestrians and cyclists alike due to the rationalised junction arrangements at Blackhall Place/King Street North and maintains public space on George's Lane.*
- For Environment, it provides for wider footpaths on Manor Street/Stoneybatter and maintains public space on George's Lane.*

As noted in section 6.4.5.4.5 of Chapter 6 of Volume 2 of the EIAR, parking and loading locations may be temporarily impacted by construction activities along the Proposed Scheme corridor. There may be temporary restrictions to on-street parking and loading facilities. The appointed contractor will discuss temporary traffic management measures with the road authority and directly affected residents/business with the aim of minimising disruption. The impact is considered to have a Negative, Slight and Temporary effect to parking and loading.

As noted in section 6.4.6.1.6.4 of Chapter 6, it is proposed to provide two loading bays with space for five vehicles on the east side of Stoneybatter, immediately to the north of Brunswick Street North.

As noted in tables 6.62 and 6.67 of Chapter 6 Traffic and Transport of Volume 2 of the EIAR, the Proposed Scheme (Do Something) will result in a forecast decrease in traffic flow of 197 PCUs on King Street North during the AM Peak hour and a decrease in traffic flow of 210 PCUs during the PM peak hour respectively.

Consequently, there will be a reduction in traffic travelling along King Street North as a result of the Proposed Scheme.

The Proposed Scheme along the Old Cabra Road / Prussia Street / Manor Street / Blackhall Place section includes operation of bus gates on a 24-hour all-day basis. Existing traffic flow levels on the corridor do not show a significant reduction in the middle of the day (relative to peak hours), and hence bus gate operation throughout the day is necessary to provide reliable bus journey times for all services. Although traffic levels reduce significantly in the overnight period, continued operation of bus gates throughout the night is preferred in order to provide road users with a road layout and network which is consistent at all times – and hence can be easily understood and safely used by car drivers, pedestrians and cyclists.

As stated in the submission the movements out of Kirwan Street will be restricted to left turn only, which will prevent northbound general traffic travelling from Grangegorman Lower to Aughrim Street as a short-cut route.

For residents of Kirwan Street wanting to access Phoenix Park, Park Shopping Centre or to travel in a northbound direction using a private vehicle, they can travel via King Street North, George's Lane and Brunswick Street North before travelling northbound on Manor Street. Another option is to travel south to the Liffey Quays and travel west, from where they can travel onwards to their chosen destination.

In the AM and PM peak hour, the forecast increase in traffic flows on Kirwan Street is less than 100 PCUs (i.e., approximately 1 vehicle per minute per direction), which is a very low level of change in traffic flow.

At AM peak hour, traffic flow on Brunswick Street North is set to decrease by 351 PCUs as a result of the proposed scheme. At PM peak hour, there is an increase of 150 PCUs as a result of the proposed scheme.

In light of this increase and in line with the thresholds detailed in section 6.4.6.2.8.2 Significance of the General Traffic Impact – Diagram 6.48 of Chapter 6 of Volume 2 of the EIAR, further assessment has been undertaken by way of a traffic capacity analysis on the associated junction (Brunswick Street North / Grangegorman Lower) along the affected link (see section 6.4.6.2.8.7 General Traffic Impact Assessment of Chapter 6). As noted in TIA sub-appendix 2 Junction Design Report of volume 4 of the EIAR, the junction operates within capacity.

2.4.3.4 Impact on Aughrim Street

Summary of issue:

The submission noted that residents are concerned that Aughrim Street will be the only arterial route for all general traffic travelling northwards from the James Joyce Bridge to the North Circular Road. The submission raised safety concerns as a result of increased traffic, particularly for pupils attending St Gabriel's school and elderly people attending church services.

It stated that general traffic should be dissuaded from using Aughrim Street to access Oxmantown Road while still facilitating access to St Gabriel's School on Cowper Street for parents and staff from Aughrim Street. The submission also suggested a pedestrian crossing should be implemented on Aughrim Street at the junction of Cowper Street to facilitate church and school crossings.

Response to issue

The proposed outbound bus gate at Blackhall Place / King Street North junction will discourage outbound general traffic from using Manor Street as a through-route. In addition, the proposed signal-controlled outbound bus priority at Stoneybatter / Brunswick Street North junction will provide priority for buses in the Stoneybatter village area, while providing wider footpaths, cycle tracks and reducing overall general traffic in this area. The proposed no right turn ban from Kirwan Street onto Manor Street will stop through general traffic from using this route to travel northbound.

As a consequence of these proposed traffic management arrangements, as noted in Tables 6.64 and 6.69 of Chapter 6, it is forecasted that the Proposed Scheme (Do Something) will result in a reduction in traffic flow of 235 and 236 PCUs on Aughrim Street compared to the Do Minimum scenario during the AM peak hour and PM peak hours respectively. The Proposed Scheme provides a balance between ensuring that use of Aughrim Street by through traffic is discouraged at all times, while also ensuring that access by car to local streets and commercial premises is maintained.

To provide an alternative route for general traffic from the City Centre e.g., along Infirmary Road and North Circular Road, the Cabra Road (Dalymount) / North Circular Road junction will be modified to allow left turns from North Circular Road onto Cabra Road (Dalymount).

While it would also be desirable to improve all surrounding areas, the Proposed Scheme has focussed on improving facilities along the corridor, based on the scheme objectives.

2.4.3.5 *Impact on St Joseph's Road, Oxmantown Road, Manor Place, Cowper Street, Aughrim Place, Arbour Hill, Montpellier Hill, Ard Righ Road and Infirmary Road*

St Joseph's Road

Summary of issue

A submission noted concern that the one-way proposal on St Joseph's Road will increase traffic travelling from Aughrim Street to Prussia Street and Park Shopping Centre. The submission proposed a solution to allow two-way local traffic on the street but making the junction of St Joseph's Road with Aughrim Street exit only.

Response to issue

As noted in section 4.5.5.1. of Chapter 4, *St Joseph's Road will be modified to include a one-way section at its eastern end (i.e., one-way in an eastbound direction). This will restrict traffic using St Joseph's Road as a means of avoiding the Bus Gate at Prussia Street / Manor Street junction.*

In the AM peak hour, the change in traffic flows on St Joseph's Road is less than 100 PCUs which is considered to be a very low level of change in traffic flow.

As noted in table 6.70 of Chapter 06 Traffic and Transport of the EIAR, the Proposed Scheme (Do Something) will result in an increase in traffic flow of 119 PCUs on St Joseph's Road in the PM peak hour, which is marginally above the threshold of 100 PCU/hour (which is considered to be a very low level of traffic increase). The forecast flows indicate that the proposed arrangement of operating a one-way section at the eastern end of St Joseph's Road (towards Prussia Street) will limit any flow increases to very low levels. The rest of St Joseph's Road will remain as a two-way street for local access.

Oxmantown Road, Manor Place, Cowper Street and Aughrim Place

Summary of issue

Submissions highlighted concern that Oxmantown Road and Manor Place will become a primary route into Stoneybatter from the North Circular Road. The submission stated that Oxmantown Road and Manor Place is a residential street, and the houses have no front gardens to act as buffers against huge volumes of traffic. The submission noted the proposed turn bans into Oxmantown Road will achieve this however raised concerns over how this will be enforced.

A submission proposed the introduction of a no-left turn ban at the top of Cowper Street onto Oxmantown Road, in order to limit access to Oxmantown Road from Cowper Street while continuing to allow access to St Gabriel's School at Cowper Street and Carnew Street.

A submission also noted that the proposals in relation to Aughrim Place are not clear as they refer to Aughrim Place running north/south but the submission notes that Aughrim Place runs in an east/west direction.

Submissions also raised concern about gaining vehicular access via Aughrim Place to the rear of properties 124 to 136 North Circular Road. The submissions stated that the drawings show proposed 'No Entry' markings which would mean access is not permitted to the rear of these properties which is unacceptable.

A submission noted that no signs or notices have been placed on Aughrim Place to inform residents of the current proposals, and they were not consulted on the proposed changes.

A submission also suggested the implementation of a 'trickled bollard system' to facilitate local access and to discourage commuter traffic using Oxmantown Road to access Stoneybatter.

A submission called for monitoring of traffic on Manor Place initially and only introduce traffic management measures if needed thereafter.

Response to issue

A no-left turn ban is proposed to prevent movement from North Circular Road onto Oxmantown Road. In addition, at the junction with Manor Street, Manor Place will be altered to a one-way street (i.e., one-way eastbound towards Manor Street), to limit use of Manor Place and Oxmantown Road by through traffic. These measures, in combination with proposals to make Cowper Street and Aughrim Place one-way westbound (at their junctions with Aughrim Street) and to make St Joseph's Road one-way eastbound at its junction with Prussia Street, will limit the use of Oxmantown Road as a through-route, while also maintaining access by car to and from local destinations. These measures, taken together, address the stated desire in the submission to facilitate local access while discouraging commuter traffic using Oxmantown Road to access Stoneybatter (for which a 'trickled bollard system' was suggested in the submission).

In the PM peak hour, traffic flow on Oxmantown Road is set to increase by 107 PCUs as a result of the proposed scheme, as noted in Table 6.70, which is marginally above the 100 PCU/hour threshold; a similar impact is expected on Manor Place.

In light of this increase and in line with the thresholds detailed in section 6.4.6.2.8.2 Significance of the General Traffic Impact – Diagram 6.48 of Chapter 6 of Volume 2 of the EIAR, further assessment has been undertaken by way of a traffic capacity analysis on the associated junction (Manor Street / Kirwan Street junction) along the affected link (see section 6.4.6.2.8.7 General Traffic Impact Assessment of Chapter 6). As noted in TIA sub-appendix 2 Junction Design Report of volume 4 of the EIAR, the junction operates within capacity.

In the AM peak hour, the change in traffic flows on Oxmantown Road is less than the 100 PCU threshold, which represents a very low level of change in traffic flow.

The NTA acknowledges the comments raised in relation to enforcement. Enforcement of road traffic laws, including turning bans at junctions is a matter for An Garda Síochána.

As noted above, as a consequence of these proposed traffic management arrangements in the Stoneybatter area, traffic flows are forecast to reduce on Aughrim Street. Consequently, it is not justified to propose to install a turning ban for traffic accessing Cowper Street from Aughrim Street as this would limit accessibility by car to local destinations.

Aughrim Place runs in a north-easterly/ south-westerly direction, with the proposed traffic management arrangements indicated on sheet 40 of the EIAR Volume 3 General Arrangement Drawings (refer to Figure 2.4.5 above).

This restricts vehicular access in a north-east direction at the junction with Lucky Lane and permits vehicular access via Aughrim Street therefore facilitating access to the rear of the properties on North Circular Road. The 'No-Entry' sign adjacent to Aughrim Street will restrict access in a north-east direction.

An extensive consultation process took place with further details provided in section 2.10.2.1 of this report.

All the required statutory notices were published for the application for the Proposed Scheme and the Compulsory Purchase Order (CPO).

Non-statutory site notices relating to the CPO were erected at a total of 51 locations along the route of the Proposed Scheme, supplementing the statutory notices for the CPO.

The locations of these were as follows:

- Multi-occupancy plots
- Recreational areas and green spaces
- Lands with changing functionality
- Public Right of Way extinguishments and/or restrictions
- Private Right of way acquisitions and/or restrictions

None of the above applied to Aughrim Place.

Arbour Hill, Montpelier Hill, Ard Righ Road and Infirmary Road

Summary of issue

Submissions stated that the new proposals will result in a number of new rat-runs being developed and will increase traffic on the streets between Manor Place/Oxmantown Road and Arbour Hill and between Arbour Hill and Infirmary Road. Residents on Montpelier Hill and Arbour Hill are particularly concerned that the traffic restrictions will divert much more traffic through their streets, which is noted as being narrower than Manor Street.

A submission stated that proposals for turning restrictions are vague, with no clear indication of exactly what is being proposed.

Submissions proposed relaxing the Bus Corridor on Prussia Street and the bus gates on Manor Street and Blackhall Place during off-peak hours and weekends with the view that this would relieve pressure on these areas and facilitate access through the village.

A submission stated that Infirmary Road appears to be becoming a primary route and questioned what analysis has been undertaken on this road.

Response to issue

The traffic impact assessment has determined that at AM and PM peak hour, the change in traffic flows on Arbour Hill, Montpelier Hill, Ard Righ Road and Infirmary Road is less than 100 PCUs (i.e., approximately 1 vehicle per minute per direction), which is a very low level of change in traffic flow.

Traffic management measures in the form of sections of one-way street and / or turn bans have been devised to minimise traffic impacts on roads adjacent to the proposed core bus corridor due to any rerouting of traffic (which may occur due to the priority given on the bus corridor scheme to pedestrians, cyclists and buses).

All traffic management proposals are indicated on Volume 3 General Arrangement drawings of the EIAR (Figure 2.4.1 to Figure 2.4.5 above). A description of the proposed traffic management measures and turning bans, reason for and impact of mitigation is detailed in tables 4.28 and 4.29 of the Preliminary Design Report.

2.4.3.6 Air Quality

Summary of issue

Submissions raised concern about the negative impact that traffic levels will have on air quality across the Stoneybatter area. They have noted that the NTA state that based on their projections, the impact on air quality will be negligible. However, they have requested reassurance that the NTA ensures that emissions do not exceed the WHO recommended exposure levels for particulate matter (PM10 and PM2.5), ozone, nitrogen dioxide and sulphur dioxide, as well as any equivalent guidelines that are designed to encourage an improvement in air quality.

A submission has requested that the NTA regularly monitor air quality on the above residential streets during peak traffic times, and to share their findings with local residents.

Response to issue

In accordance with *Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes* (TII 2011), only the assessment of nitrogen dioxide, oxides of nitrogen, PM10 and PM2.5 are relevant for the assessment of road schemes. These pollutants are considered in Chapter 7 Air Quality of Volume 2 of the EIAR.

As noted in section 7.6.1 of Chapter 7, *overall it is considered that the residual effects as a result of the Proposed Scheme's construction are neutral and short-term. No significant residual impacts have been identified during the Construction Phase of the Proposed Scheme, whilst meeting the scheme objectives set out in Chapter 1.*

In terms of operational impacts, 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:

- As shown on figure 7.3 of Volume 3 of the EIAR, the receptors in the Stoneybatter area will experience between a negligible to substantial beneficial impact in terms of the annual mean NO_2 concentration.
- As shown on figure 7.4 of Volume 3 of the EIAR, the receptors in the Stoneybatter area will experience a negligible impact in terms of the annual mean PM_{10} concentrations.
- As shown on figure 7.5 of Volume 3 of the EIAR, the receptors in the Stoneybatter area will experience a negligible impact in terms of the annual mean $PM_{2.5}$ concentration.

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.

The EPA is the competent authority with responsibility for air quality monitoring in Ireland. The EPA carries out air quality monitoring of various parameters at numerous locations across Dublin. Real-time data is provided along the Proposed Scheme at Blanchardstown, Phoenix Park and Cabra (<https://airquality.ie/readings>).

In addition, the EPA publishes an annual report summarising the results of the monitoring countrywide. Results are compared in this annual report to both air quality standards and World Health Organisation (WHO) guidelines.

2.4.3.7 Road Safety

Summary of issue

Local residents have raised concerns at the risk of increased traffic levels on residential streets and the risk this will pose for the safety of pedestrians, cyclists and other road users. They have stated that there are many children and schools in the area and increased traffic levels will dissuade parents from encouraging their children to walk and cycle.

They welcome the proposal for a 30km per hour speed limit through the village, and request that this be monitored by speed checks and visible signage with speeds flashing on it.

Response to issue

Chapter 6 Traffic and Transport of Volume 2 of the EIAR (para. 6.4.6.2.8.2) identifies an increase of 100 PCU/hour or more as the threshold for further assessment; this threshold represents a very low level of change in traffic flow (of around 1 vehicle per minute in one direction). As noted in sections 2.4.3.4 and 2.4.3.5 above, the predicted change in traffic flows as a result of the proposed scheme is as follows:

- Aughtim Street: reduction in traffic flow at AM and PM peak hours.
- St Joseph's Road: increase in traffic flow of 119 PCUs on St Joseph's Road at the PM peak hour. At the AM peak hour, the change in traffic flows is less than 100 PCUs (i.e., approximately 1 vehicle per minute per direction), which is a very low level of change in traffic flow.
- Oxmantown Road: At the PM peak hour, traffic flows are set to increase by 107 PCUs as a result of the proposed scheme, as noted in Table 6.70. At the AM peak hour, the change in traffic flows is less than 100 PCUs (i.e., approximately 1 vehicle per minute per direction), which is a very low level of change in traffic flow.
- Kirwan Street: At the AM and PM peak hours, the change in traffic flows is less than 100 PCUs (i.e., approximately 1 vehicle per minute per direction), which is a very low level of change in traffic flow.
- Arbour Hill, Montpelier Hill and Infirmary Road: the traffic impact assessment has determined that at the AM and PM peak hour, the change in traffic flows is less than 100 PCUs (i.e., approximately 1 vehicle per minute per direction), which is a very low level of change in traffic flow.

Hence, the changes in flow on local streets are close to, or below, the 100 PCU/ hour threshold which is a very low level of traffic increase, and hence it can be concluded that the road safety conditions for pedestrians, cyclists and other road users on local residential streets will not be significantly affected as a result of the proposed scheme.

Speed limit signs will be erected in accordance with the Department of Transport Traffic Signs Manual.

2.4.3.8 Landscaping and Greening Stoneybatter

Summary of issue

A submission stated that the proposals shown on final plans and drawings for the green area at the junction of Manor Street, Aughrim Street and Prussia Street are unclear and that it should be a condition of planning that the landscaping should be done in close cooperation and only after a full consultation with the local community.

A submission also stated that a previous presentation to the Stoneybatter PoP group by the NTA, it was stated that the revised proposals would ensure wider footpaths and avert the need to remove four trees. There is concern that the four trees are still being removed.

A submission stated that there is no evidence of trees on the plans for the Proposed Scheme including the existing trees on Prussia Street and Manor Street.

Submissions requested engagement with Dublin City Council on the Greening Stoneybatter initiative. The submission requested that planting be pollinator friendly. The submission also urged public realm improvements to Aughrim Street.

A submission called for the greening of bus shelters particularly in the Stoneybatter area.

A submission questioned if any coordination has taken place with other infrastructure projects in Stoneybatter.

Response to issue

The various improvements to the public realm at Stoneybatter have been outlined in section 2.4.3.1 above with Figure 2.4.8 and Figure 2.4.9 showing before and after photomontages from Figure 17.2 of Volume 3 of the EIAR. Details of the proposed landscape can be seen on sheets 32 and 33 of the Landscape General Arrangement drawings in Volume 3 of the EIAR. An extract of these sheets is shown in Figure 2.4.13 and Figure 2.4.14. Three trees are proposed to be removed to facilitate the Proposed Scheme, with 36 new trees planted as part of the public realm improvements described further in section 2.4.3.1.

The NTA has had ongoing engagement and coordination with Dublin City Council in regard to the CBC Scheme planning taking on board other plans like the Greening Stoneybatter initiative.

The Landscape General Arrangement drawings (Figure 2.4.12 to Figure 2.4.15 below) indicate the use of pollinator friendly flowering perennials within the green area at the junction of Aughrim Street and Manor Street.

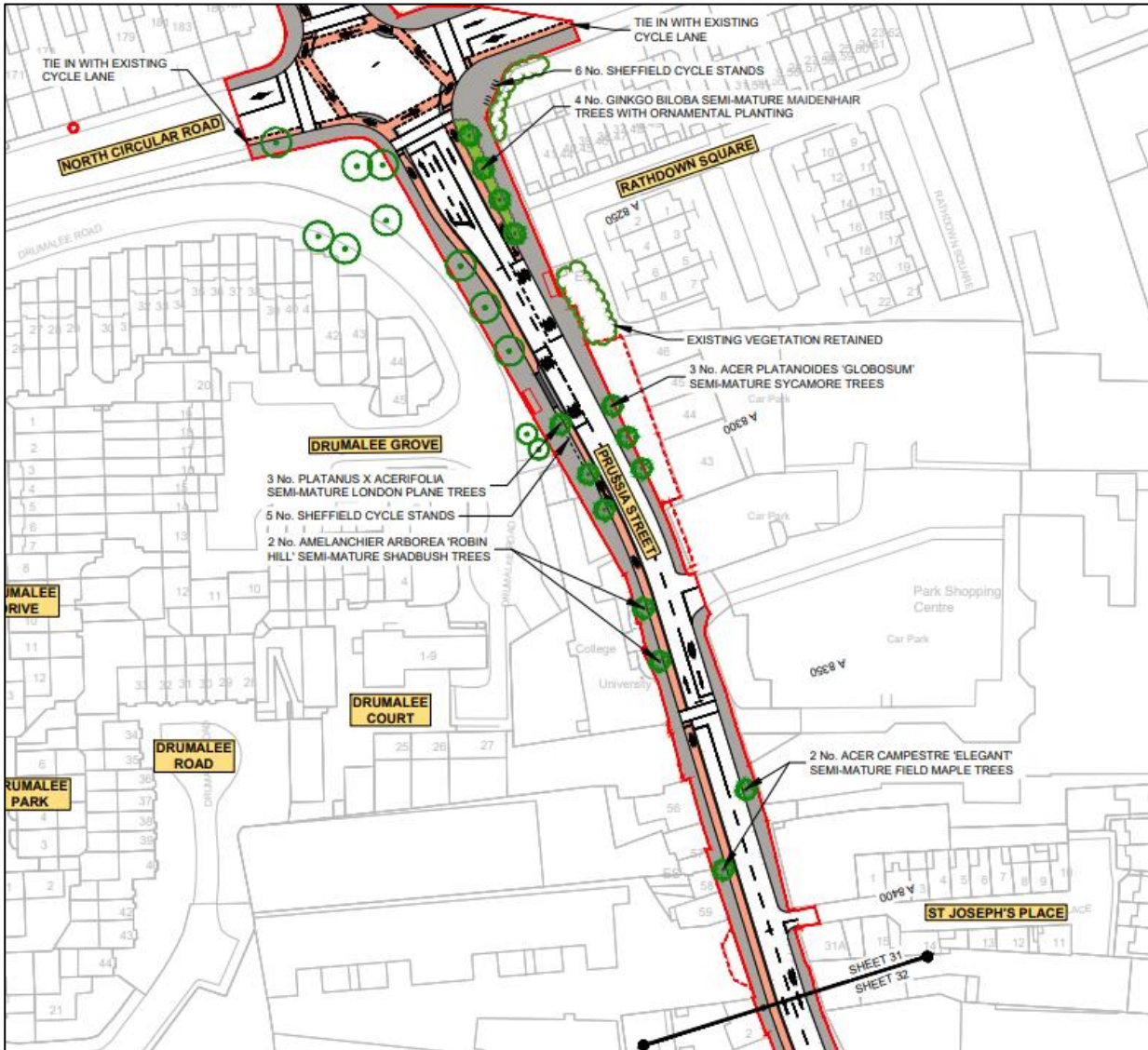


Figure 2.4.11: Extract 1 from Landscaping General Arrangement

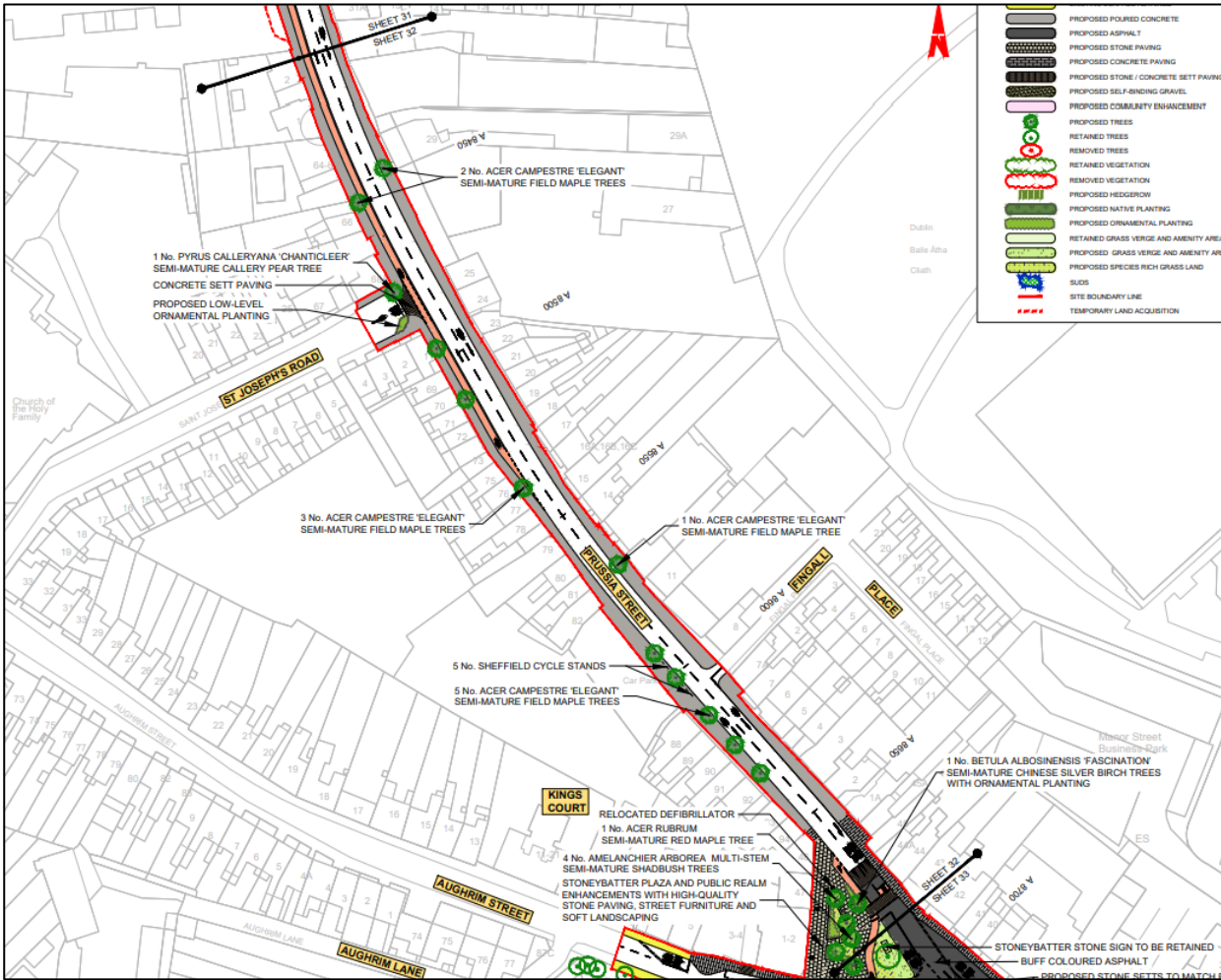


Figure 2.4.12: Extract 2 from Landscaping General Arrangement



Figure 2.4.13: Extract 3 from Landscaping General Arrangement

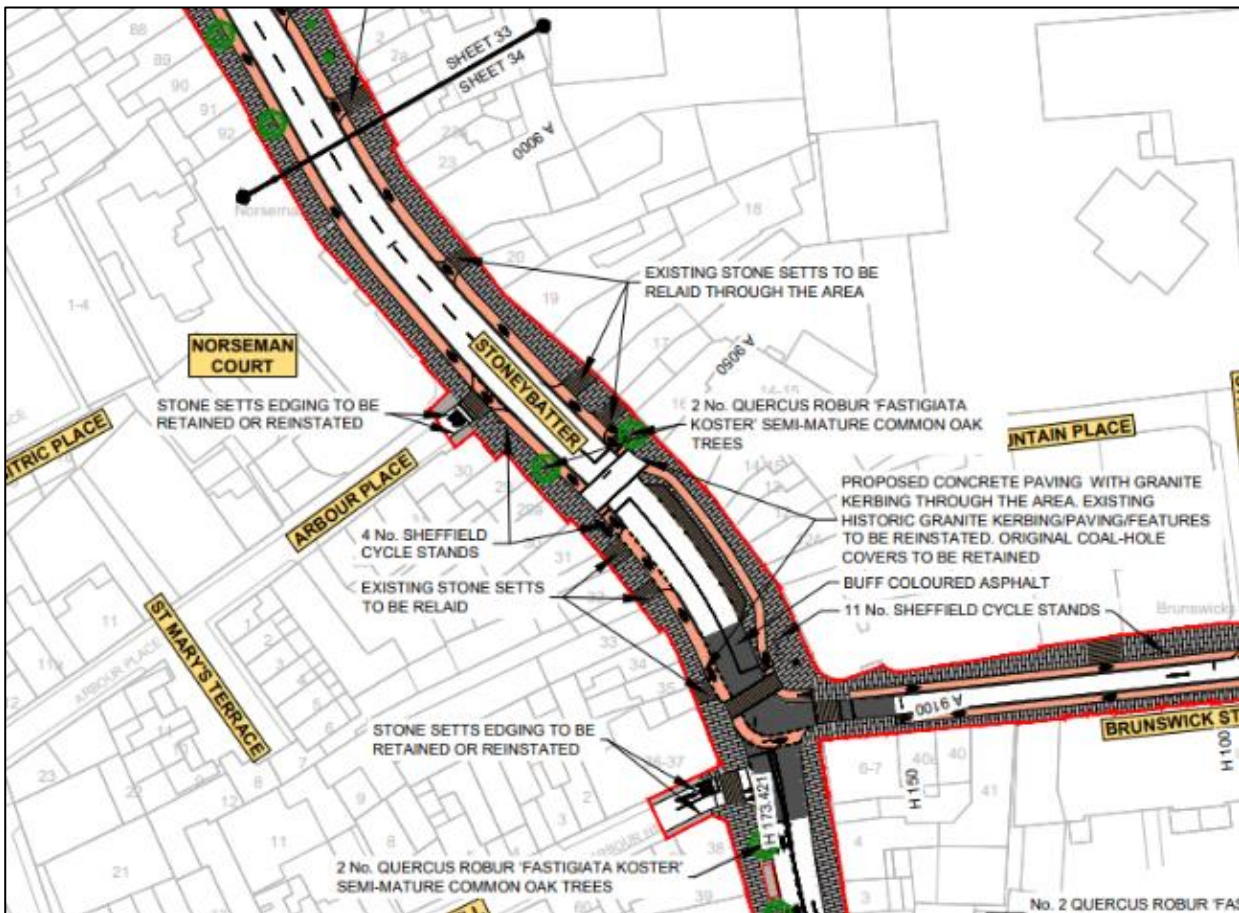


Figure 2.4.14: Extract 4 from Landscaping General Arrangement

The junction of Aughrim Street and Prussia Street / Manor Street is included in the public realm improvements proposed on the corridor.

2.4.3.9 *Cycling Infrastructure*

Summary of issue

The submission stated that the Climate Change Action Plan has a commitment to investing 10% of transport infrastructure investment in cycling infrastructure. The submission requested to know the breakdown of the percentage budget for cycle lanes in Stoneybatter compared with the percentage allocated for bus infrastructure.

The submission welcomed the proposed improvements to cycling infrastructure in the Stoneybatter area. However, the submission questioned the absence of a southbound cycle lane and a partial northbound cycle lane on Prussia Street, along with the lack of a cycle lane on Aughrim Street.

The submission stated the need for bicycle parking to be put in place across the village along with a 30 km/h enforceable speed limit. The submission expressed disappointment that a bike station is not proposed outside Love Supreme on Manor Street, noting it was agreed at a meeting with the NTA.

A submission stated that there has been no consideration given to cyclists in the Proposed Scheme.

The submission also stated the need for a comprehensive cycling plan which will link the Blanchardstown CBC with the Liffey Cycle route.

Response to issue

One of the objectives of the Proposed Scheme outlined in Chapter 01, Introduction of Volume 2 of the EIAR is to *‘Enhance the potential for cycling by providing safe infrastructure for cycling, segregated from general traffic wherever practicable’*.

Two-metre-wide one-way cycle tracks are being provided along both sides of Manor Street and Stoneybatter. This arrangement allows for two-abreast cycling, which in accordance with the National Cycle Manual allows for overtaking within the cycle track. These fully segregated cycle tracks will significantly enhance the safety of cyclists. Buses will utilise the general traffic lanes along Prussia Street, Manor Street and Stoneybatter.

The proposed works include high-quality improvements for bus, pedestrian, and cycle infrastructure users, in addition to associated public realm enhancements for the area, and consequently the improvements are costed as a whole sustainable solution to achieve the aim and objectives of the Proposed Scheme.

A short section of southbound cycle track will be provided on Prussia Street from its junction with North Circular Road before cyclists merge with general traffic just north of Park Shopping Centre. In the northbound direction, the cycle track will commence approximately 50m south of the junction with St Joseph's Road. These details can be seen on Figure 2.4.1 and Figure 2.4.2 in this report.

Prussia Street is a particularly constrained location due to the existing cross section being narrow. Providing a cycle track along the full extent of this section would result in the footpath widths reducing below the minimum width of 1.8m set out in DMURS. Instead, it is deemed suitable for cyclist to merge onto the general traffic lane here due to reduced traffic flows and the proposed speed limit of 30 km/h. As noted in Chapter 6 Traffic and Transport tables 6.62 and 6.67 respectively, the Proposed Scheme (Do Something) will result in a decrease in traffic flow of 856 PCUs during the AM Peak hour and a decrease in traffic flow of 926 PCUs during the PM peak hour on Prussia Street.

While it would also be desirable to improve all surrounding areas, the Proposed Scheme has focussed on improving facilities along the corridor, based on the scheme objectives.

It is further noted that there are 16 sheffield cycle stands proposed on Prussia Street and 27 proposed on Manor Street, giving a total of 86 spaces for bicycles, which is an increase with respect to existing provision and will facilitate those accessing the area by bicycle.

Eight sheffield cycle stands are proposed outside Love Supreme. It is a matter for Dublin City Council whether they wish to incorporate this into a 'Dublin Bikes' location.

Section 4.6.6.1 of Chapter 4 Proposed Scheme Description of Volume 2 of the EIAR states that the Proposed Scheme facilitates improved existing and new interchange opportunities with other transport services including the Greater Dublin Area Cycle Network Plan. As noted in section 4.5 of the Preferred Route Option Report of the Supplementary Information, the interaction of the Proposed Scheme with other cycle route schemes progressing through the planning and design process has also been considered in the design process, including the Liffey Cycle Route Scheme.

Section 6.4.6.1.2 Cycling Infrastructure of Chapter 6 Traffic and Transport of Volume 2 of the EIAR states:

This assessment outlines the changes to the quality of cycling provision along Section 5 of the Proposed Scheme. The key cycling improvements along Section 5 of the Proposed Scheme can be summarised as follows:

- *Provision of 1.5m to 2m wide cycle tracks on both sides of R805 Old Cabra Road between R147 Navan Road and North Circular Road, replacing on-road cycle lanes;*
- *Provision of 2m cycle tracks on Manor Street between Aughrim Street and Brunswick Street North, replacing on-road cycle lanes and shared bus / cycle lanes;*
- *Provision of two 1.5m wide cycle tracks running along Brunswick Street North, and a 3.25 m wide cycle track along George's Lane and Queen Street between Blackhall Place and Arran Quay, providing cyclists with an alternative route to Blackhall Place, where current facilities are limited to shared bus / cycle lanes;*
- *Full cycle crossing facilities at the Brunswick Street North / George's Lane signalised junction; and*
- *Provision of green signal priority at signalised junctions, where currently cyclists share green time with traffic.*

Table 6.43 (reproduced as Table 2.4.3) presents the overall Do Minimum LoS and Do Something LoS ratings for each segment within Section 5, along with the resultant Impact Assessments. A detailed breakdown of the assessment can be found in Appendix A6.4.2 (Cycling Infrastructure Assessment) in Volume 4 of this EIAR.

Table 2.4.3: Section 5 – Cycling Impact during Operational Phase Location Chainage Do Minimum LoS

Location	Chainage	Do Minimum LoS	Do Something LoS	Description of Impact	Sensitivity	Significance of Effect
R805 Old Cabra Road: R147 Navan Road to R101 North Circular Road	A7400 – A8200	B	B	Negligible	High	Not Significant
R805 Prussia Street: R101 North Circular Road to Aughrim Street	A8200 – A8700	C	B	Low	High	Positive Moderate
R805 Manor Street / Stoneybatter: Aughrim Street to Brunswick Street North	A8700 – A9100	C	B	Low	Medium	Positive Moderate
Brunswick Street North to Ellis Quay / Arran Quay	Do Minimum A9100 – A9500 (Blackhall Place) Do Something -A9100 – G000 (Brunswick Street North, George’s Lane and Queen Street)	C	A	Medium	High	Positive Very Significant
Section Summary	-	C	B	Low	High	Positive Moderate

The contents of Table 6.43 (reproduced as Table 2.4.3) demonstrate that the Proposed Scheme will have an overall long-term positive impact on the quality of the cycling infrastructure along Section 5.

The LoS for the four sub-sections in the Do Minimum scenario has been assessed as either B or C, indicating that the existing facilities are generally adequate, but not of a particularly high standard. The LoS in the Do Something scenario show improvements in two sub-sections, bringing the LoS across Section 5 to either an A or B rating, primarily as the result of the introduction of dedicated off-road cycle tracks to replace existing on-road facilities. Overall, it is anticipated that there will be Positive, Moderate and Long-term effect to the quality of the cycling infrastructure along Section 5 of the Proposed Scheme, during the Operational Phase. A detailed breakdown of the assessment along each section can be found in Appendix A6.4.2 (Cycling Infrastructure Assessment) in Volume 4 of this EIAR. The findings of the cycling assessment fully align with the objective of the CBC Infrastructure Works, applicable to the Traffic and Transport assessment of the Proposed Scheme, to ‘Enhance the potential for cycling by providing safe infrastructure for cycling, segregated from general traffic wherever practicable’.

2.4.3.10 Pedestrian Infrastructure

Summary of issue

A submission stated that the footpath width on Manor Street will be reduced to allow for a cycle path and has called for wider footpaths at the junction of Stoneybatter and King Street North and the junction of Prussia Street and Manor Street.

A submission requested that footpaths along Stoneybatter, Manor Street, Prussia Street and Aughrim Street should be checked for accessibility and disability access, and that all footpaths should be dished at appropriate intervals to facilitate wheelchair users.

A submission stated that there has been no consideration given to pedestrians in the Proposed Scheme.

A submission noted concern that the Proposed Scheme does not have toucan and pedestrian crossings at the southern end of the village and the removal of pedestrian crossings at Brunswick Street North and King Street North should be reviewed. The submission requested that the number of pedestrian crossings should be maintained with full accessibility for disabled users.

A submission welcomed the proposed upgraded crossing at the junction of Aughrim Street, Manor Street and Prussia Street, but is concerned with the huge levels of traffic at that junction as a result of the Proposed Scheme.

Response to issue

Refer to section 2.4.3.1 which discusses the proposed footpath widths along Manor Street and Stoneybatter.

The footpath widths at the junction of Stoneybatter and King Street North are maximised in conjunction with the need to facilitate the swept path of vehicles and will either match or will be wider than the existing situation.

As outlined in section 4.6.2.1 of Chapter 4, Proposed Scheme Description of Volume 2 of the EIAR, relevant design standards have been adhered to in relation to footpath widths. *DMURS defines the absolute minimum footpath width for road sections as 1.8m based on the width required for two wheelchairs to pass each other. Building for Everyone: A Universal Design Approach (NDA 2020), defines acceptable minimum footpath widths at specific pinch points as being 1.2m wide over a two-metre length of path.*

In accordance with section 12 Accessibility of Appendix 4.1 Preliminary Design Guidance Booklet for BusConnects Core Bus Corridors of Volume 4 of the EIAR, *Gradients and crossfalls of footpaths are to be compliant with the relevant standards and/or guidance. Dropped kerbs are to be provided as required. Pedestrian crossing points should be provided with tactile paving in each direction of approach, as indicated in the publication 'Guidance on the use of Tactile Paving Surfaces' by the UK DETR Nov 98.*

As shown in Figure 2.4.4, there is a proposed toucan crossing at chainage A 9050, close to the location of an existing pedestrian crossing, and chainage A 9100 across Brunswick St North and a pedestrian crossing at the junction of Stoneybatter and Brunswick Street North, where currently no pedestrian crossing exists. There is also a pedestrian crossing proposed to the southern side of Stoneybatter / King Street North junction, from its current location to the north of the junction, along with a pedestrian crossing across King Street North. Consequently, there is an increase in crossings from 3 to 5 at the 'southern end' of the village as a result of the proposed scheme.

As stated in Sections 2.4.3.1 and 2.4.3.4, traffic flows on Manor Street and Aughrim Street are predicted to reduce as a result of the Proposed Scheme.

Section 6.4.6.1.6 Pedestrian Infrastructure of Chapter 6 Traffic and Transport of Volume 2 of the EIAR states:

The assessment of the qualitative impacts on the pedestrian infrastructure for Section 5 of the Proposed Scheme is summarised in Table 6.42 along with the accompanying sensitivity for each junction and the resultant significance of impact.

Table 6.42 is reproduced as Table 2.4.4 below.

Table 2.4.4: Section 5 – Significance of Effects for Pedestrian Impact during Operational Phase

Junction	Chainage	Do Minimum LoS	Do Something LoS	Magnitude of Impact	Sensitivity	Significance of Impact
R805 Old Cabra Road / Earl's Court	A7600	D	B	Medium	Medium	Positive Significant
R805 Old Cabra Road / Glenbeigh Road priority to signalised junction	A7700	D	A	Medium	Medium	Significant
R805 Old Cabra Road / Cabra Drive	A7930	D	B	Medium	Medium	Positive Significant
R805 Prussia Street / North Circular Road signalised junction	A8200	D	A	Medium	High	Positive Very Significant
R805 Prussia Street / St Joseph's Road	A8500	E	B	Medium	Medium	Positive Very Significant
R805 Manor Street / Aughrim Street signalised junction	A8700	D	B	Medium	High	Positive Very Significant
R805 Manor Street / Kirwan Street signalised junction	A8850	C	A	Medium	High	Positive Very Significant
R805 Stoneybatter / Brunswick Street North / Arbour Hill signalised junction	A9100	D	B	Medium	High	Positive Very Significant
Blackhall Place / King Street North signalised junction	A9150	C	B	Low	High	Positive Moderate
Blackhall Place / Blackhall Street signalised junction	A9300	D	B	Medium	High	Positive Very Significant
R804 Brunswick Street North / Grangegorman Lower / George's Lane	H025	C	A	Medium	Medium	Significant
King Street North / George's Lane / R804 Queen Street	K000	C	A	Medium	Medium	Significant
R804 Queen Street / Blackhall Street	J000	D	A	Medium	Medium	Positive Significant
Section Summary		D	B	Medium	Medium	Positive Significant

The contents of Table 6.42 (reproduced as Table 2.4.4) demonstrate that the Proposed Scheme will have a long-term significant positive impact on the quality of the pedestrian infrastructure at junctions within Section 5. The LoS during the Do Minimum scenario ranges between C and E. In the Do Something scenario, improvements have been assessed as achieving either an A or B rating at all junctions. These improvements are the result of comprehensive pedestrian improvements at junctions along this section, with the provision of compliant footpath and crossing widths, dropped kerbs and tactile paving, and the introduction of design features that will reduce vehicle speeds. Three existing priority junctions will be signalised as part of the Proposed Scheme, which will allow the provision of controlled crossings where none currently exist. This is as a result of the proposed improvements to the existing pedestrian facilities in the form of additional crossing locations, increased pedestrian directness, provision of traffic calming measures to reduce vehicle speeds, improved accessibility and increased footpath and crossing widths. All proposed facilities have been designed in accordance with the principles of DMURS and Building for Everyone: A Universal Design Approach (NDA 2020) with regards to catering for all users, including those with disabilities.

2.4.3.11 Land Ownership Boundaries

Summary of issue

Submissions stated that most properties will have title deeds that include maps that show ownership to the centre of the carriageway, and thus works to footpaths and carriageway may have CPO implications.

A submission stated that property owners may have a right to park on proposed footpath areas which are currently car parking spaces along carriageway edge.

A submission noted that scheme boundaries, as shown on drawings, are incorrect and include privately owned lands.

The submission stated that title deeds of properties along Manor Street indicate ownership to the centre of the road, which includes parking spaces. The submission noted that owners would be within their rights to park on the new footpath, should their parking space be removed. The submission noted that a substantial portion of area in front of Manor Street is in private ownership.

Response to issue

The Blanchardstown to City Centre Core Bus Corridor Scheme Compulsory Purchase Order 2022 and Schedule includes all lands to be acquired for the purpose of the construction of the Blanchardstown to City Centre Core Bus Corridor Scheme.

As set out in section 1.4 of Chapter 1 of Volume 2 of the EIAR, the NTA made a decision under section 44(2)(b) of the Dublin Transport Authority Act 2008 (as amended) (the “2008 Act”) on 18 October 2019 that it considered it to be more convenient, more expeditious, more effective or more economical that the functions in relation to the provision of the public transport infrastructure be performed by it in relation to this Proposed Scheme among others.

Section 44(6) of the 2008 Act provides:

“(6) *Where –*

(a) a decision is made by the Authority under subsection (2)(b) or (5)(a) for the performance of a particular function otherwise than through a public transport authority or statutory body, or

(b) the Authority is performing its function of securing the provision of public transport infrastructure in accordance with subsection (2)(e),

the following provisions have effect –

(i) the Authority shall be empowered (notwithstanding any other enactment) to perform the function, including the acquisition of land for that purpose, and to do any other thing which arises out of or is consequential on or is necessary for the purposes of or would facilitate the performance of the function,

(ii) for the purpose of paragraph (a) or (b), land may be acquired by agreement or by means of a compulsory purchase order made by the Authority in accordance with Part XIV of the Act of 2000,

(iii) the provisions of any enactment concerned apply in relation to the performance of the function subject to such modifications as may be necessary and as if the Authority was named in such enactment in each place where a public transport authority or other statutory body entitled to exercise the function is named”

A “public transport authority” is defined under section 2 of the 2008 Act as including a “road authority” and the NTA effectively “steps into the shoes” of the road authority in the context of its functions in relation to the provision of public transport infrastructure in relation to this Proposed Scheme.

In particular, the NTA will be stepping into the shoes of the road authority in the context of section 13(7) and 13(8) of the Roads Act 1993 (as amended) (the “1993 Act”) which provide as follows:-

“(7) *A road authority may do all such things as arise out of or are consequential on or are necessary or expedient for the performance of its functions under this Act or otherwise in relation to public roads or are ancillary thereto.*

(8) Without prejudice to the generality of subsection (7) and save as otherwise provided by law, a road authority may –

(a) provide any amenity, structure or thing for the safety or convenience of road users,

(b) undertake landscaping, planting or any similar activity in the interests of amenity and the environment,

(c) provide artistic features.”

Manor Street is a “public road” as defined by section 2 of the 1993 Act being “a road over which a public right of way exists and the responsibility for the maintenance of which lies on a road authority”.

Therefore, the NTA is satisfied that it has the necessary power to do the works proposed on Manor Street.

2.4.3.12 Alternative Options

Summary of issue

Submissions proposed a contra-flow system through Stoneybatter area consisting of an inbound bus lane in the morning and an outbound bus lane in the evening.

Another submission questioned why the buses cannot run through Phoenix Park instead.

A submission stated that the road is not wide enough in Stoneybatter to accommodate the proposed cross-sections.

Response to issue

As noted in section 3.3.2.3 of Chapter 3 Reasonable Alternatives of Volume 2 of the EIAR, the preferred route option from Old Cabra Road to the Quays *would commence at Old Cabra Road at the junction with the Navan Road, running straight along Prussia Street and through Stoneybatter. Beyond Stoneybatter the route will follow a one-way system between Queen Street and Blackhall Place via King Street.*

With respect to this preferred route, three options were then assessed, and section 6.3.2 of Preferred Route Option Report in the Supplementary Information states the following:

Numerous submissions received as part of the public consultation process raised concerns that the proposed traffic management plans, in particular, restricting general traffic movement through Stoneybatter, may cause increased levels of general traffic on residential roads as well as creating congestion elsewhere on the road network. Submissions also raised concerns about the impact on green space at the junction of Manor Street, Prussia Street and Aughrim Street, and constrained width of footpaths in Stoneybatter.

Three options have been assessed as follows:

Option SB1: *Option SB1 proposals consist of a southbound and northbound bus gate on Prussia Street at its junction with Aughrim Street. South of Aughrim Street, two general traffic lanes and two cycle tracks would be provided on Manor Street until the junction at Manor Place. Along Manor Street / Stoneybatter between Manor Place and Brunswick Street North, cycle tracks in both directions would be provided, with an outbound bus lane, and inbound and outbound general traffic lanes.*

Option SB2: *EPR Option SB2 proposals consist of an inbound general traffic lane, with an inbound bus lane on Prussia Street beginning at , and an outbound bus lane beginning just south of Manor Place. Aughrim Street would have a general traffic lane in both directions at its junction with Manor Street. Along Manor Street / Stoneybatter south of Manor Place, there would be general traffic lanes in both directions, a bus lane southbound, and a northbound cycle track.*

Option SB3: *Option SB3 proposals consist of a southbound and northbound bus gate on Prussia Street at its junction with Aughrim Street. South of Aughrim Street, inbound and outbound general traffic lanes and two cycle tracks would be provided on Manor Street / Stoneybatter until the junction at Brunswick Street North. A northbound bus priority signal is proposed on Blackhall Place where northbound general traffic would need to turn right into King Street North, and then via George’s Lane and Brunswick Street North, to reach Manor Street.*

Alternatives were considered, but not progressed, as follows:

Closing Stoneybatter to through traffic: *Full closure of through-traffic access via Stoneybatter was considered unfeasible due to the impracticality of preventing through vehicular traffic while also allowing the necessary vehicular access for local residents and businesses.*

For example, it would be necessary to allow local traffic to enter from the north or south, and the return journey would require long diversions of around 3km (e.g. via North Circular Road) which would both tend to create local congestion and would also tend to encourage drivers to perform three-point turns on the bus corridor to avoid having to follow a one-way diversion route on their return journey.

Routing cyclists through Grangegorman: Routing cyclists through Grangegorman instead of along Prussia Street and Manor Street was also considered, which would require a cycle link from the northern end of Prussia Street through to Grangegorman Lower. For purposes of the CBC, this alternative cycle route would not be an essential component, and routing cyclists along Prussia Street and Manor Street (Route 4D in the GDA Cycle Network Plan) would provide an appropriately high quality and direct route.

Routing of the CBC corridor via Phoenix Park: Use of Phoenix Park has been identified by stakeholders as a potential alternative route for buses between Blanchardstown and the city centre. However, the general principle for successfully attracting people to use buses is to ensure that the bus service path is as close as potential to where people live, work and visit. In this respect, it is essential that the CBC is routed via Stoneybatter in order to ensure that people who live and work there, or need to visit, are able to do so using a high frequency bus service (which is connected to the wider bus network to maximise travel catchment). Hence the potential for routing the CBC corridor via Phoenix Park has not been taken forward for detailed consideration.

Based on the assessment undertaken, route Option SB3 offers more benefits. It performs well under all criteria. Option SB3 is the preferred option for the Prussia Street/Manor Street to Brunswick Street North section for the following reasons:

- *For economy, it provides reliable bus priority through Stoneybatter Village while also limiting through traffic efficiently (on Blackhall Place), while also allowing local access for residents and businesses; and acknowledging the urban village function of Stoneybatter Village;*
- *For integration, it provides high-quality segregated cycle tracks on both sides of the road, serving the urban village of Stoneybatter which is a significant trip attractor and cycling destination;*
- *For safety, it has two general traffic lanes and hence more clarity in terms of lane usage and associated management of through traffic, and has wider footpaths for pedestrians; and*
- *For environment, it allows for the wider footpaths and associated public realm improvements within Stoneybatter Village.*

2.4.3.13 Access Routes

Summary of issue

A number of submissions questioned how to access different areas and locations with the Proposed Scheme in place. These queries are noted below along with a response on how access to these areas will be possible.

Manor Street

Summary

Submissions have highlighted that local traffic looking to access Stoneybatter village will have to undertake a circuitous route along the North Circular Road, Infirmary Road, the Quays, back up Blackhall Place, along King Street North and Brunswick Street.

Submissions stated that local businesses are particularly concerned about the impact this will have on their trade. For example, Grants Clothing services schools from all over the country and particularly from Meath, North Dublin, Kildare and Wicklow. They are particularly concerned as to how their customers can access their businesses.

Response

Although a bus gate will prevent general traffic movement between Prussia Street and Manor Street, this does not preclude access to Stoneybatter by car and other traffic.

Car access from the south will be available via Brunswick Street North, and from the north either via North Circular Road, Infirmary Road and North Quays or via local streets such as Oxmantown Road as shown in Figure 2.4.15 below. Transport modelling indicates that flows on Manor Street / Stoneybatter will be at around 150 vehicles per hour at peak times.

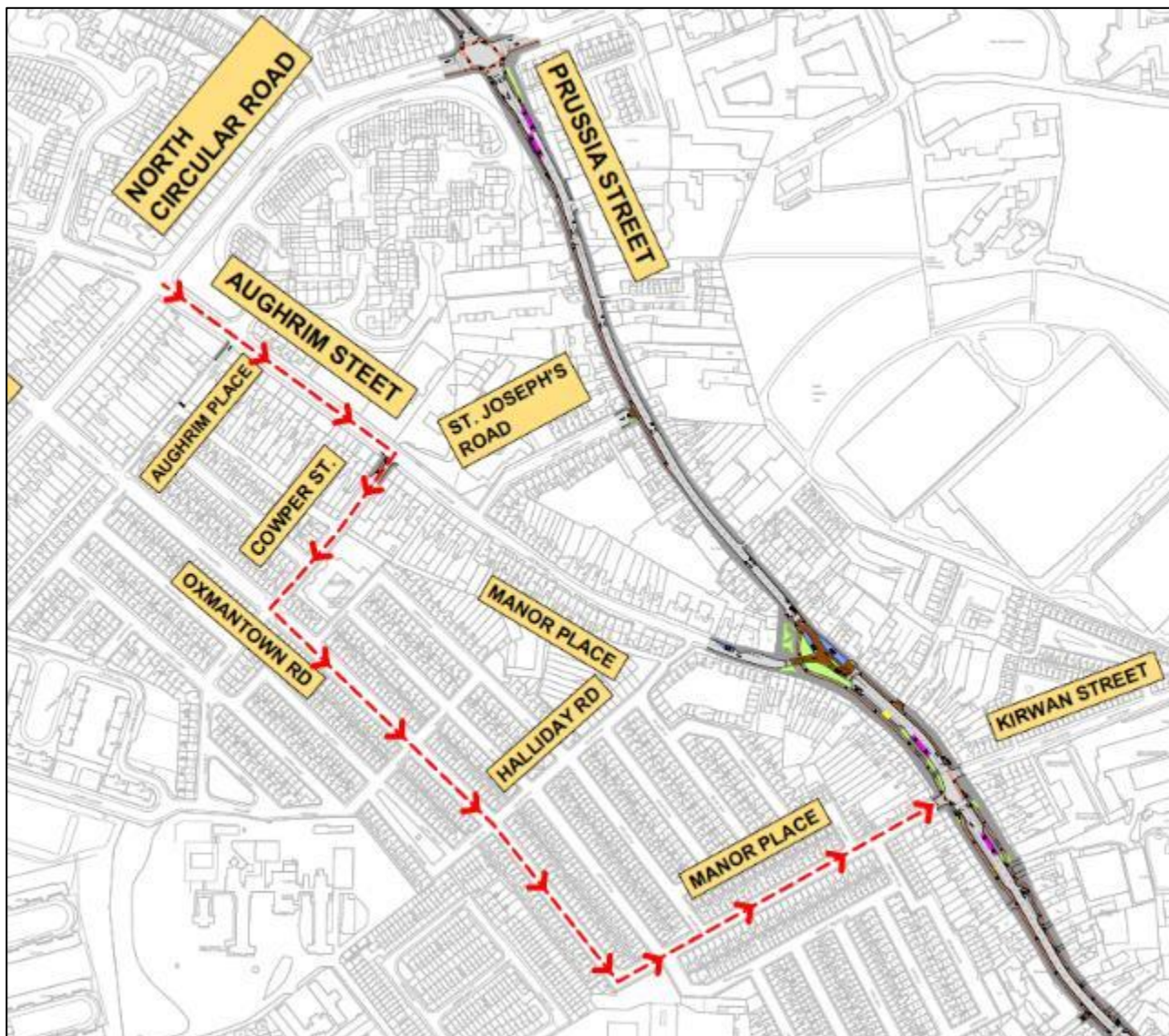


Figure 2.4.15: Possible access route from North Circular Road to Manor Street

Prussia Street / St Joseph's Road

Summary

Submissions questioned access to Prussia Street from Arbour Hill area, along with the return journey. A submission noted that this would require access via Infirmary Road.

A submission stated that left turn bans on Manor Place, Arbour Place and Arbour Hill will force all Arbour Hill and Montpellier residents to travel via the Quays to access Prussia Street.

A submission stated that the Proposed Scheme will result in the local residential streets in the Stoneybatter area acting as the main routes for traffic resulting in safety issues as a result of increased traffic. The submission noted that the only alternative will be to travel via the Quays to Infirmary Road and North Circular Road to access Prussia Street.

A submission questioned how residents of Aughrim Street and St Joseph's Road will access the North Quays.

Response

Access to Prussia Street from Arbour Hill will be available via the surrounding road network. Options for this journey are shown in Figure 2.4.16 below. Option 1 is via Manor Place as a left turn from Manor Place onto Manor Street will be permitted. Option 2 is via King Street North and northbound via Brunswick Street North and Aughrim Street.

Access to Arbour Hill from Prussia Street will be available via Aughrim Street, Cowper Street, Oxmantown Road and Ard Righ Road, as shown in Figure 2.4.17.

Access to St Joseph's Road from the south will be available via Aughrim Street.

Access to the North Quays from St Joseph's Road will be available via North Circular Road and Infirmary Road.

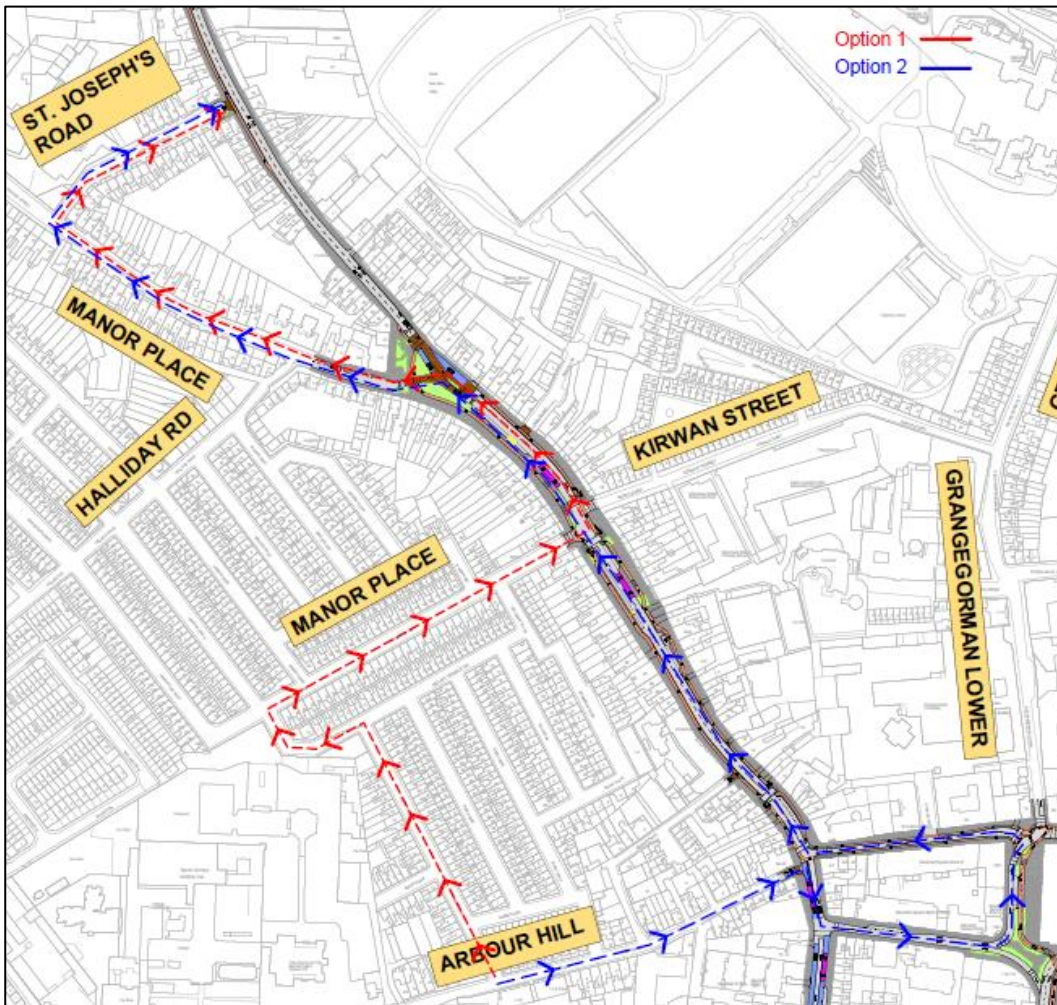


Figure 2.4.16: Possible access routes from Arbour Hill to Prussia Street

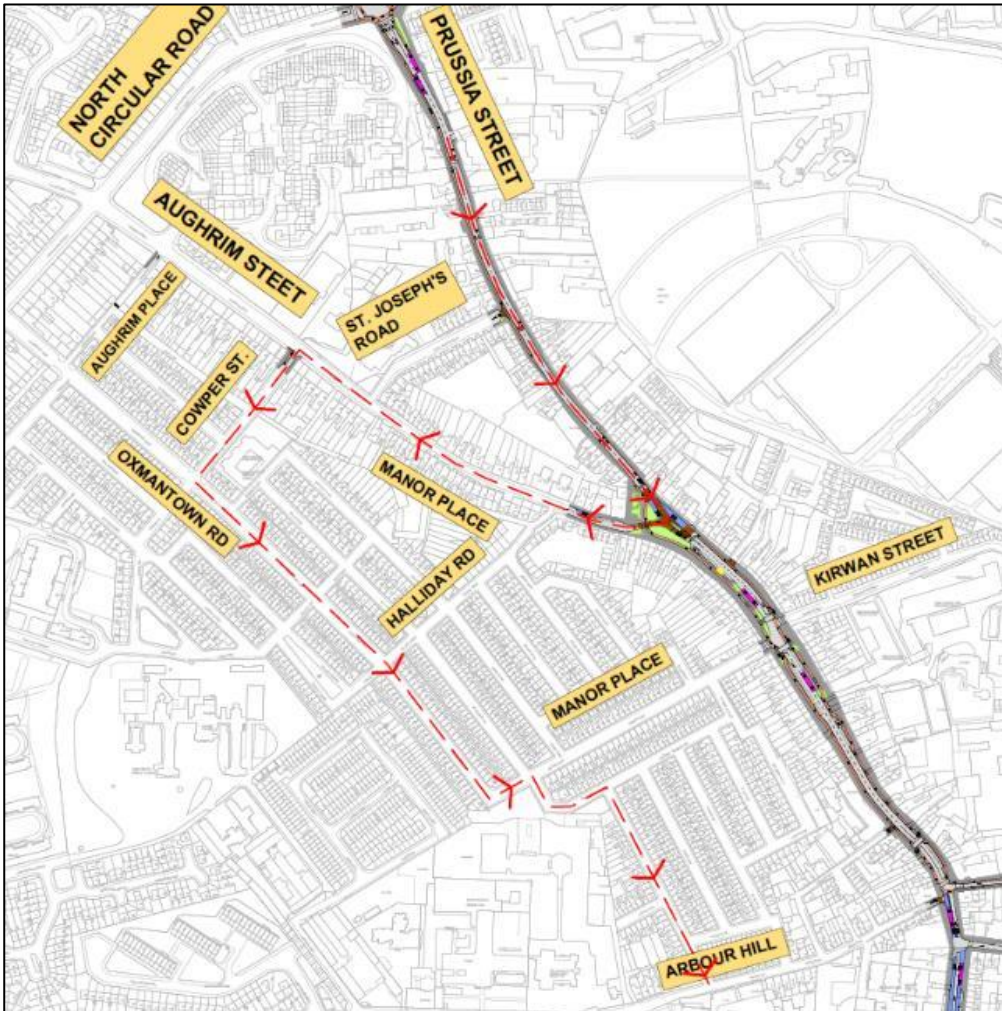


Figure 2.4.17: Possible access route from Prussia Street to Arbour Hill

Fingal Place /St Joseph’s Place

Summary

Submissions questioned how access to and from Fingal Place /St Joseph’s Place.

Response

Access to Fingal Place and St Joseph’s Place by private vehicle from the north will be via North Circular Road and Prussia Street. From the southern side, access can be gained by travelling along Manor Street, Aughrim Street, St Joseph’s Road and Prussia Street.

Those exiting St Joseph’s Place or Fingal Place by private car can access North Circular Road via Prussia Street (turning left only onto North Circular Road) or via Aughrim Street.

Grangegorman

Summary

A submission questioned how to gain access to Grangegorman from Arbour Hill.

A submission noted that residents of Grangegorman Lower will be required to detour via Aughrim Street to access Prussia Street, and their return journey would require travelling along North Circular Road, Infirmary Road and along the Quays.

Response

Access to Grangegorman Lower from Arbour Hill will be available via King Street North and George’s Lane as shown in Figure 2.4.18 below.

Access to Grangegorman from Prussia Street will be available via Aughrim Street, Cowper Street, Oxmantown Road, Manor Place, Manor Street and onwards via King Street North as shown in Figure 2.4.18.

Access from Grangegorman Lower to Prussia Street under the Proposed Scheme will be by travelling southbound on Manor Street and then onwards via King Street North, George's Lane, Brunswick Street North, northbound on Manor Street and onwards via Aughrim Street. This route is shown in Figure 2.4.20.

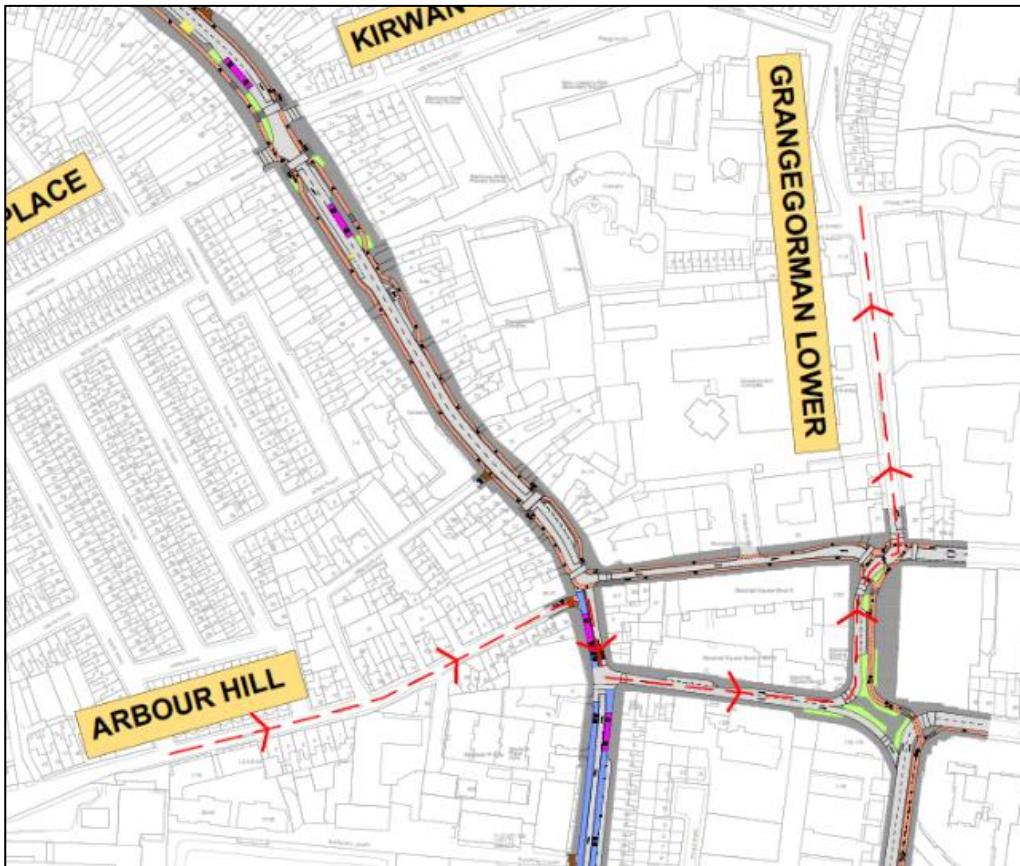


Figure 2.4.18: Possible access route from Arbour Hill to Grangegorman

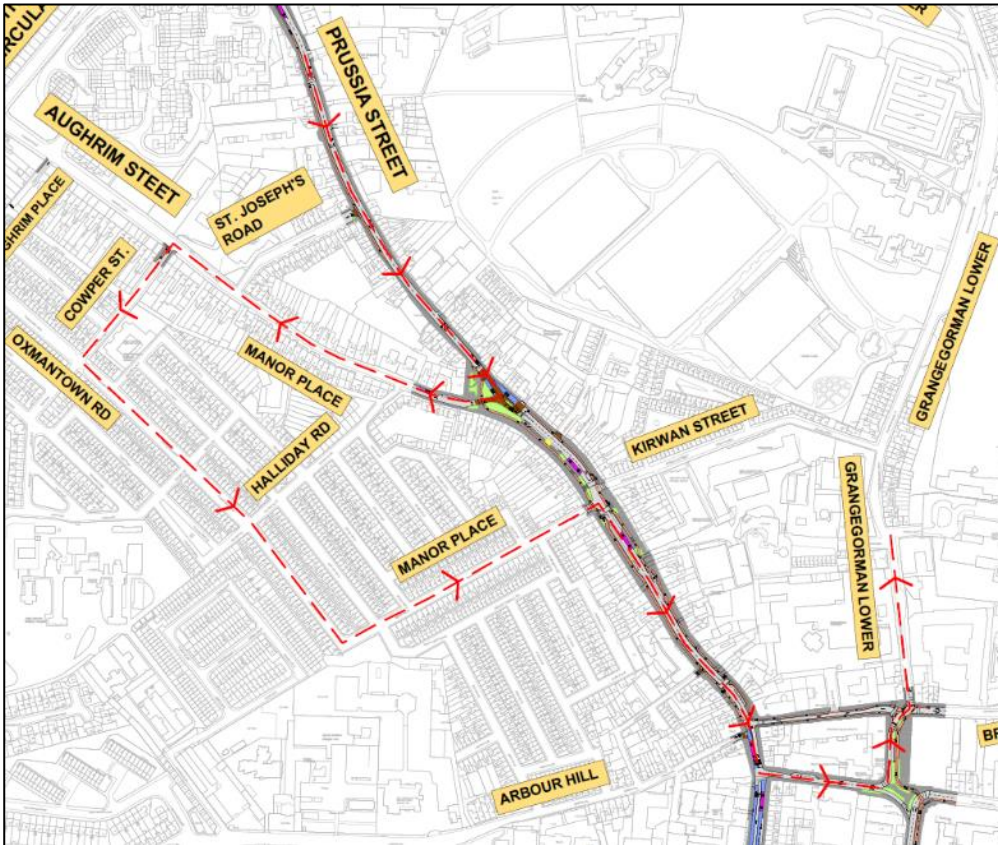


Figure 2.4.19: Possible access route from Prussia Street to Grangegorman

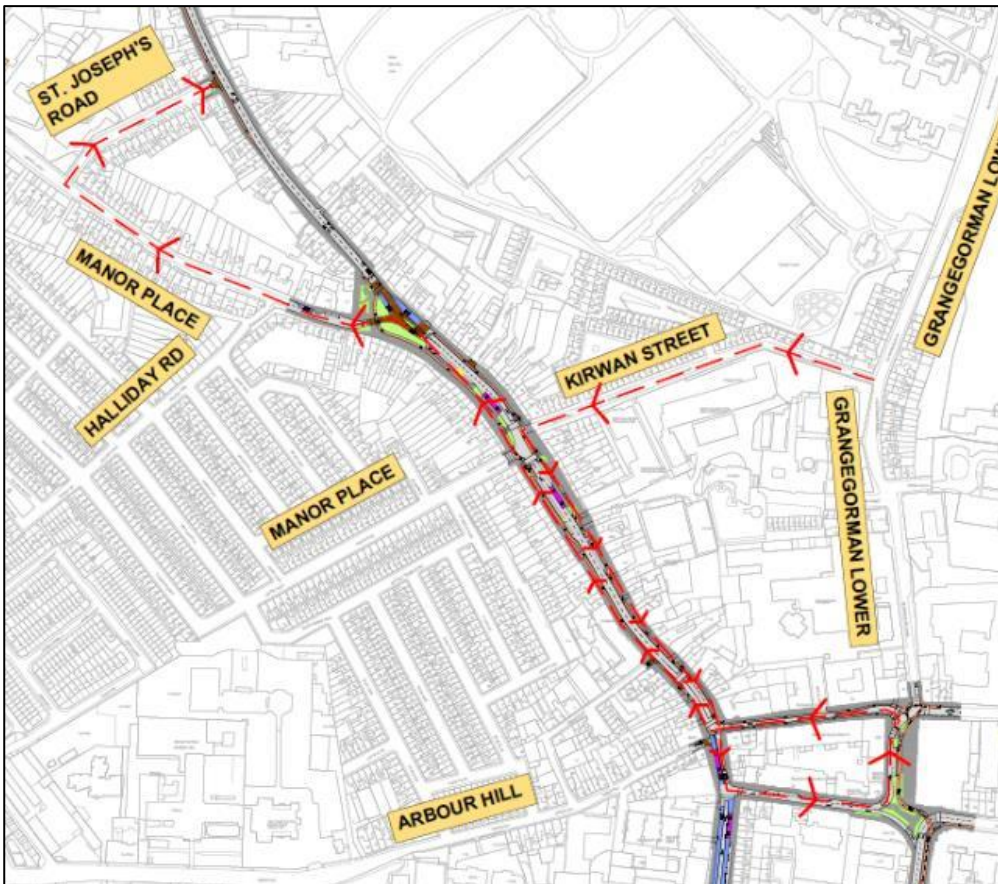


Figure 2.4.20: Possible access route from Grangegorman to Prussia Street

Rathdown Road

Summary

A submission stated that to get to Rathdown Road from Prussia Street requires a circuitous journey via Blackhorse Avenue and Skreen Road.

Response

Access to Rathdown Road from Prussia Street will be available via Aughrim Street and North Circular Road as shown in Figure 2.4.21 below.

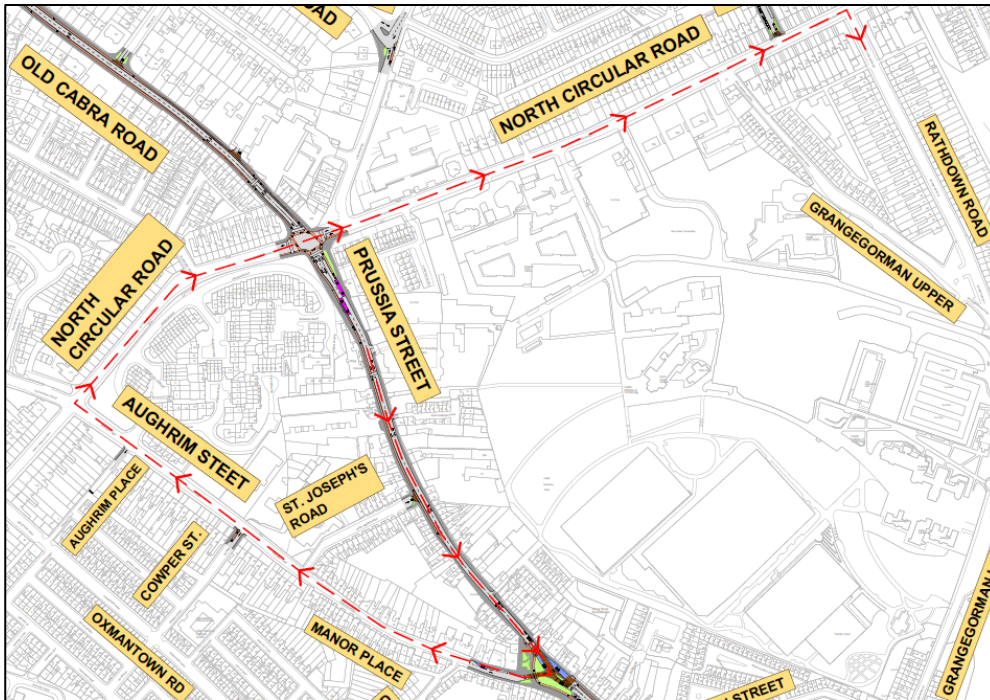


Figure 2.4.21: Possible access route from Prussia Street to Rathdown Road

Cabra Road / Navan Road / Old Cabra Road

Summary of issue

Submissions also queried how to access amenities in Cabra and on Navan Road as well as Lidl on Old Cabra Road, from the Stoneybatter area.

Response to issue

Access to the North Circular Road from the Stoneybatter area will be available via Aughrim Street or Prussia Street (left turn only onto North Circular Road). A new left turn is permitted at the junction of North Circular Road and Cabra Road (Dalymount) to facilitate access to Cabra Road and Navan Road by private vehicle. Access to Lidl on the Old Cabra Road will be available via the Old Cabra Road / North Circular Road junction or via Glenbeigh Road.

2.4.3.14 Bus accessibility

Summary of issue

The submissions stated that the proposed bus routes will be beneficial for those living beyond the Navan Road however by the time the busses make it to the local area the busses are often over-crowded, and people are left stranded. The submission questioned how this will be rectified.

Response to issue

One of the objectives of the Proposed Scheme, as noted in section 1.2 of Chapter 1 of Volume 2 of the EIAR, is 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.

Section 6.3 Baseline Environment of Chapter 6 of the EIAR states the following:

Bus services along the Proposed Scheme currently operate within a constrained and congested environment, with 40% priority outbound and 10% priority inbound on the corridor. An examination of Automatic Vehicle Location (AVL, collected by the NTA) data indicates that the current standard deviation for journey times of buses on the corridor is 12 minutes. With any further increases in traffic levels, these issues are expected to be exacerbated. While impacting upon bus passengers, longer and less reliable bus services also require operators to use additional buses to maintain headways to fill gaps created in the timetable. Aligned to this, the remaining sections of unprioritised bus network can lead to bunching of buses which, in turn, means stops can become overcrowded, creating delays in boarding and alighting and the imbalanced use of bus capacity.

The Proposed Scheme will facilitate opportunities to increase bus network capacity operating along the corridor due to the extensive priority provided.

As noted in 6.4.6.2.7 Increased Bus Frequency – Resilience Sensitivity Analysis of Chapter 6 states the following:

For the purposes of this EIAR and the transport modelling undertaken in support of the EIAR, no increase in bus service frequency beyond that planned under the current Bus Connects Network redesign proposals was assessed. The bus frequencies used in the modelling are based on the proposed service rollout as part of the BusConnects Network Redesign and are the same in both the Do Minimum and Do Something scenarios. This rollout is currently underway. The rationale for undertaking this approach was that the planning consent being sought and which this EIAR supports is solely for the infrastructural improvements associated with providing bus priority along the Proposed Scheme.

This analysis, however, is conservative as the bus priority infrastructure improvements and indeed the level of protection it will provide to bus journey time consistency and reliability will provide a significant level of resilience for bus services that will use the Proposed Scheme from implementation into the future. The resilience provided by the Proposed Scheme will allow the service pattern and frequency of bus services to be increased into the future to accommodate additional demand without having a significant negative impact on bus journey time reliability or the operation of cycle and pedestrian facilities. In order to assess this resilience and the potential impacts of this resilience on carbon emissions, an additional analysis has been undertaken, which is detailed below.

2.5 Proposed Scheme in Phibsborough and adjacent streets

2.5.1 Description of Proposed Scheme at this location

As noted in section 4.5.5.1 General overview of the Proposed Scheme of Chapter 4 Proposed Scheme Description of Volume 2 of the EIAR:

The Proposed Scheme will limit the use of Old Cabra Road to local access traffic, buses, taxis and cyclists as follows:

- *No through traffic in the southbound direction at the northern end of Old Cabra Road (at its junction with Navan Road), except for buses, taxis and cyclists, which precludes general traffic from Navan Road travelling to Stoneybatter along Old Cabra Road;*
- *No through traffic in the northbound direction except for buses, taxis and cyclists, due to proposed introduction of a Bus Gate at the railway overbridge on the Old Cabra Road, which precludes general traffic from Stoneybatter and the North Circular Road from travelling along Old Cabra Road through to Navan Road. Local traffic in the northbound direction will have access as far as the Bus Gate.*

To provide an alternative route for general traffic to and from the City Centre (along Cabra Road, North Circular Road, Infirmary Road and Conyngham Road), the Cabra Road (Dalymount) / North Circular Road junction will be modified to allow right turns from Cabra Road (Dalymount) to North Circular Road and left turns from North Circular Road onto Cabra Road (Dalymount).

Traffic management measures such as one-way streets and / or turn bans will be required to minimise traffic impacts on side roads due to diverted traffic (which may occur due to the priority given on the Proposed Scheme to pedestrians, cyclists and buses).

A short one-way northbound section will be required on Annamoe Road at its junction with Annamoe Terrace and on Charleville Road at its junction with North Circular Road.

No access is proposed from Phibsborough Road onto Phibsborough and Monck Place, along with the introduction of right turn bans onto Phibsborough Road.

There is also a short one-way westbound section at the western end of Swilly Road.

Extracts from General Arrangement Drawings which are provided as an appendix to Chapter 4 in Volume 3 of the EIAR are included below in Figure 2.5.1 to Figure 2.5.4.



Figure 2.5.1: Extract 1 from General Arrangement Drawing



Figure 2.5.2: Extract 2 from General Arrangement Drawing

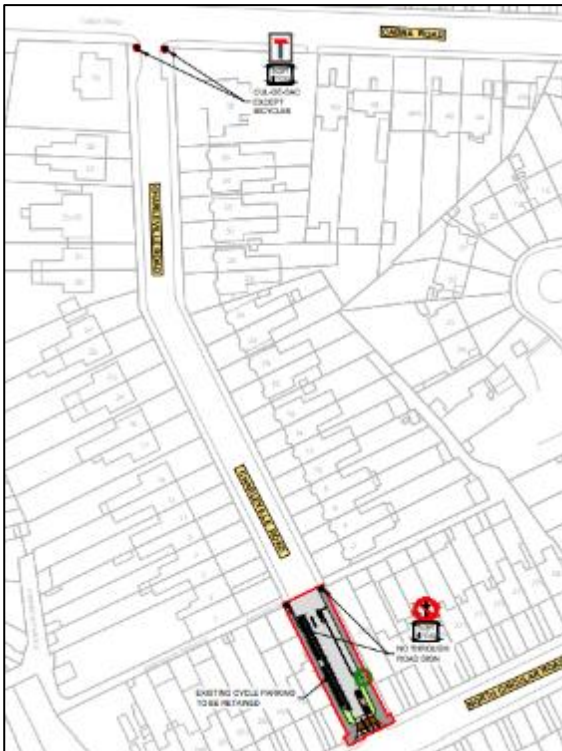


Figure 2.5.3: Extract 3 from General Arrangement Drawing

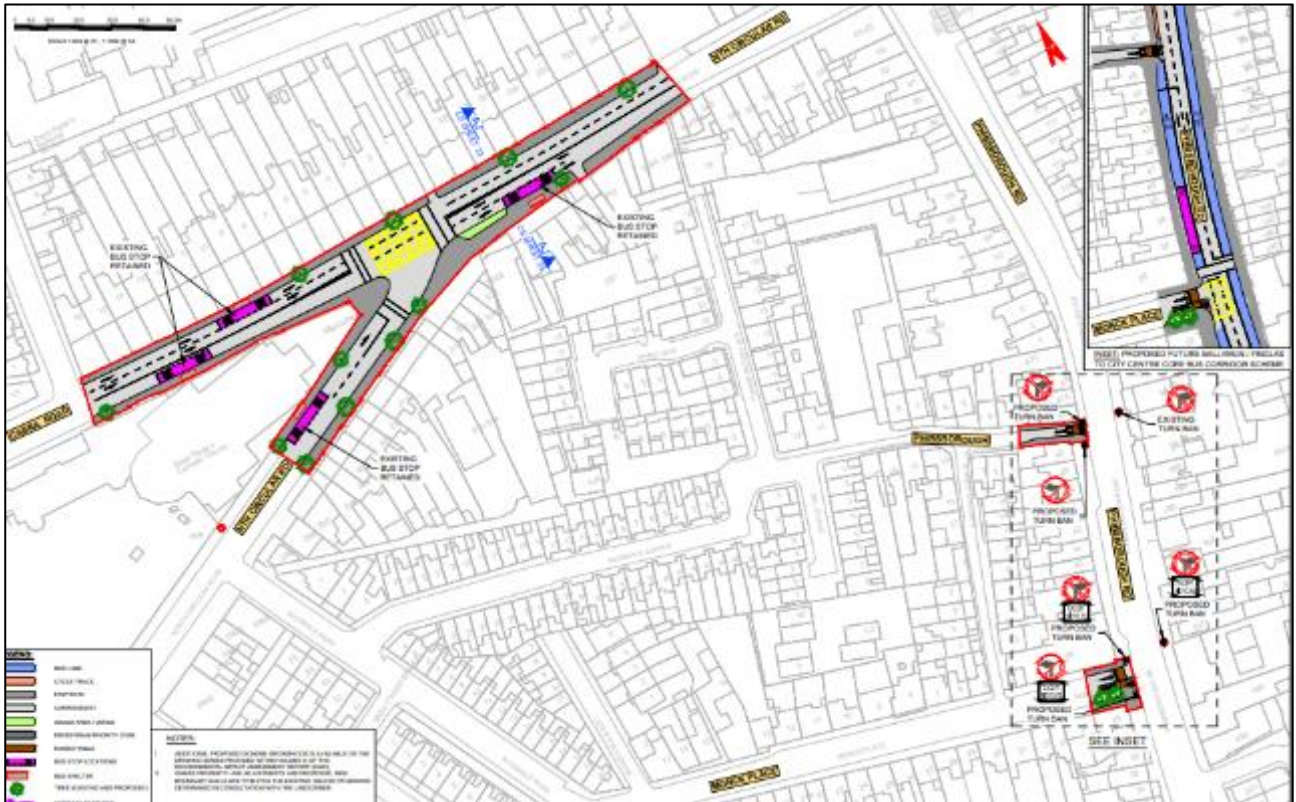


Figure 2.5.4: Extract 4 from General Arrangement Drawing

2.5.2 Overview of Submissions Received

As shown in Table 2.5.1 below, 64 submissions were made in relation to the Proposed Scheme at this location. Out of the 64 submissions 15 were supportive of the Proposed Scheme.

Table 2.5.1: Submissions made in respect of Phibsborough and adjacent streets

No.	Name	No.	Name	No.	Name
2	Annamoe Park Resident Association	41	Declan & Judith Hannigan	76	Cory Mifsud
4	Edel Behan	43	Lorraine Hester	77	Adam Moore
5	Colm Bodkin	44	John Higgins	78	Miriam Moore
6	Dr Aoife Bourke & Dr Megan Wilson	46	Patricia Hughes	84	Brianán Nolan
7	Susan Bowers, Juliet Bowers & Beatrice	47	Hilary Humphreys	92	Raymond O’Keeffe
8	Ciara Browne	48	Orla Jones	94	Katie O’Shea & Other
9	Rachel Byrne	49	Dalen Kambur & Helen Whelan	95	Katie Papkovskaia
10	Cabra Park Residents Association	51	Niall & Antoinette Kavanagh	96	Cllr. Cieran Perry
12	Brian Chadwick	52	Orla Keane	97	Phibsboro Village Tidy Towns (PVTT)
13	Dr Lucy Chadwick	53	Anne Marie Kiernan	98	Prussia Street Traders
14	Stephen Clancy	58	Leinster Street North Residents Group	99	Rathdown Road & District Residents Association
15	Jim Clarke	59	Carey Lening & David Benbennick	100	Catherine Reilly
17	Connaught Street Resident’s Association	63	Antanas Luobikis & Ausra Luobikiene	104	Claire Ruxton
18	Connecting Cabra	64	Grainne Lynch	105	Enda Ruxton
21	Susanne Crowe	67	Councillor Ray McAdam	106	Shandon Residents Association
22	Brendan & Anne Curran	68	Councillor Eimear McCormack	107	Senator Marie Sherlock
27	Garbhan Doran & Helen McLoughlin	70	Eileen McGoldrick	110	Patricia Swan
34	Alan Fitzgerald	71	Anne McKee	116	Des Twomey
35	Gary Fitzgerald	72	John McKee	120	James Ward
36	Senator Mary Fitzpatrick	73	Seamus McKee	121	Gerry Weir
38	Brian Foley & Lorraine Rowland	74	Donnacha McKenna		
39	Miriam Gill	75	Lisa McKenna		

The key issues raised by the submissions relating to the Proposed Scheme at this location are as follows:

- Increase in traffic flows and associated safety and journey time impacts
- Cumulative Impacts
- Lack of public consultation on proposed traffic management measures
- Support for the Proposed Changes
- Air Quality
- Noise Pollution
- Flawed Classification System
- Inadequate referencing and lack of consistency in documentation
- Discrepancies in drawings
 - Charleville Road
 - Annamoe Terrace and Road
- Cabra Road / North Circular Road junction (@ St Peter's Church)
- Data Collection;
 - Traffic and Transportation
 - Air Quality
 - Noise and Vibration
 - Road Safety Audits
- Site Notice on Charleville Road

2.5.3 Common Issues Raised

2.5.3.1 *Increase in traffic flows and associated safety and journey time impacts*

Summary of issue

Submissions stated that the introduction of the bus gate on Old Cabra Road along with the proposed traffic management changes on Annamoe Road and Charleville Road will result in all Cabra to Stoneybatter traffic being displaced as far as St Peter's Church junction to access the North Circular Road, or to Skreen Road and Blackhorse Avenue.

Submissions noted that proposed traffic management on Charleville Road and Annamoe Road will cause major disruption to residents trying to get to or come from the local roads, including North Circular Road and Prussia Street. Submissions questioned the need for the proposed changes at Monck Place, Annamoe Terrace and Charleville Road and stated they will cause increased journey times, detours around already overloaded roads and will impact businesses. Submissions noted that the only access point into Avondale Avenue and Monck Place and Phibsborough will be via Avondale Road which is too narrow. Submissions also noted that the proposed changes at Monck Place are not consistent with changes requested by residents.

Submissions noted that these changes will also result in additional traffic on Phibsborough Road and will close off Old Cabra Road, Annamoe Road, Charleville Road and Monck Place as routes for travelling from north to south.

A submission noted that the rat-running from North Circular Road onto Phibsborough Road will be reduced and welcomed the removal of northbound through traffic from Monck Place and Phibsborough. The submission also noted that northbound traffic travelling along North Circular Road will divert onto Avondale Road to access Phibsborough Road to travel northbound and called for traffic calming measures on Avondale Avenue.

Submissions called for southbound traffic to be permitted to access Monck Place and Phibsborough.

Submissions stated that access to garages on Charleville Road will be more difficult due to increased one way traffic on Charleville Road. A submission objected to the impact of heavy traffic, due to the proposed traffic management measure on Charleville Road, will have on accessing the gated laneway opposite Annamoe Parade where the proposed traffic management measure is located.

A submission stated that the traffic management proposals will limit the ability for emergency services due to increased congestion. The submission suggested that emergency vehicles transiting through the Phibsborough area have not been considered.

A submission noted that the Proposed Scheme will further increase traffic congestion in the wider Cabra and Phibsborough areas and increase risk for vulnerable road users.

Submissions also noted congestion at Hanlon's corner, Doyle's corner and Church Street is already unacceptable and the proposals will further increase delays.

Submissions stated that access to and from the city would be more difficult causing increased journey times from 10 minutes to one hour, resulting in increased fuel usage. Submissions also noted that local commutes to and from schools and shops etc. would take longer.

A submission raised concerns about safety due to the increased traffic in the area and stated that there would be an increased risk of accidents due to driver frustration.

Submissions noted that southbound traffic from Glasnevin to large parts of residential areas in Phibsborough and along the North Circular Road will be displaced off the Phibsborough Road, onto Connaught Street, St Peter's Road and onto the junction at St Peter's Church, in order to access the North Circular Road. Submissions stated that Connaught Street will also receive displaced traffic, southbound from Cabra.

Submissions raised particular concern about St Peter's Road due to it being narrow and being the location of a primary school with associated heavy traffic during school term and noted that the Proposed Scheme will undermine the 'school zone' measures that currently exist. A submission also noted that the junctions at St Peter's Road are regularly congested, and the street is used by cyclists and for parking during games at nearby Dalymount Park.

Submissions noted that Connaught Street is extremely narrow and is already a difficult transport environment, with high traffic volumes, large number of schools and a GAA club in the area, resulting in many young adults and children walking and cycling to school and activities. It was also noted that there is a large demographic of elderly persons in the area.

Submissions noted that the proposed traffic management proposals in the Phibsborough area will result in traffic diverting onto other roads to access this area, which will increase traffic on Fassagh Avenue, Fassagh Road, Dowth Avenue, Western Way, Mountjoy Street and Berkeley Street and Berkeley Road.

Submissions stated that concerns previously expressed to the NTA on the impact of additional traffic on Fassagh Avenue, Fassagh Road and Connaught Street has not been considered, and went on to state that the NTA have been inconsistent and unfair in its dealings with local residents.

A submission stated the changes at Annamoe Terrace, Charleville Road, Monck Place, Phibsborough Road and North Circular Road will affect their long-standing business at 9 Norton's Avenue as customers will struggle to access the business location. The submission stated that as a mechanic they will have increased costs to access broken down vehicles in the locality due to the increased journey times making costs untenable.

Submissions stated that residents of Charleville Road, Rathdown Road, Rosemount Road, Cherrymount Park and Great Western Square will have significant difficulties accessing their homes when travelling from north of the North Circular Road.

Submissions noted that Leinster Street North is a narrow one-way street with a two-way contra flow system for cyclists, which is used by school children. The submissions requested that traffic mitigation measures are developed for Leinster Street North to ensure it is not used as a relief road to Connaught Street including preventing vehicles travelling the wrong direction. The submission also requested that the speed limit be reduced from 30km/h to an appropriate speed for a shared car/cycle street.

A submission stated that queues on Connaught Street will increase rat running through Shandon Crescent and Shandon Park.

A submission is concerned that motorists will take a shortcut to avoid Western Way by exiting Phibsborough Road at White Lane, along Royal Canal Bank, Geraldine Street and Goldsmith Street to access North Circular Road and that these streets are unsuitable to large volumes of traffic. The submission requested that additional traffic restrictions be applied to these roads in consultation with residents and noted that there will be added risk to the elderly and children along Royal Canal Bank.

Submissions suggested use of local access only restrictions or use of restrictions at peak times only and consider trialling the proposed traffic management measures initially. A submission proposed permitting access at peak hours to facilitate those travelling to work where public transport is not available.

A submission noted that “.....Since the baseline studies were completed there have been a number of major road closures and alterations in the area from Phibsborough to the City Centre. These include the permanent closure of Grangegorman Lower and Capel Street, the reduction of the North Quays to a single lane to provide for new cycling lanes, a segregated cycling lane from the canal to the Liffey along Constitution Hill to give a few examples. This has resulted in a reduced road capacity for both public and private vehicular traffic. It has resulted in a much longer travel time from Phibsborough into the City Centre on both Bus, Luas and private car due to tail backs at key junctions. These major changes to the current transport system have not been taken into consideration in any of the baseline data and so it cannot be considered sound to base all the modelling on out-of-date, faulty, inaccurate data.....”

Another submission also noted concern lack of consideration given to pedestrianisation of Capel Street.

Response to issue

It is noted in Chapter 6 Traffic and Transport of Volume 2 of the EIAR that the modelled forecasts for the 2028 opening year indicate that one of the impacts of the proposed Blanchardstown to City Centre Core Bus Corridor Scheme is that there is forecasted to be a reduction of 14% in the number of people travelling via car along the Navan Road corridor towards the city centre at AM peak hour. Similarly, in the PM peak hour, there is a reduction of 18% in the number of people travelling via car, as shown in Figure 2.5.5 and Figure 2.5.6. This will reduce the overall traffic movement along the Navan Road – City Centre corridor.

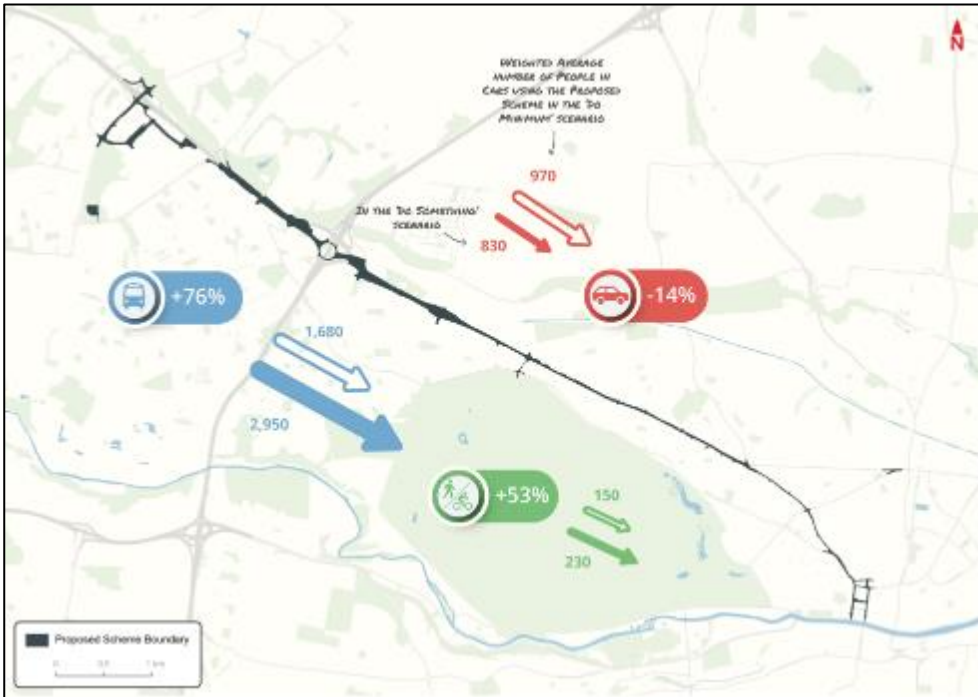


Figure 2.5.5: Extract of Diagram 6.5 People Movement by Mode travelling along the Proposed Scheme during 2028 AM Peak Hour

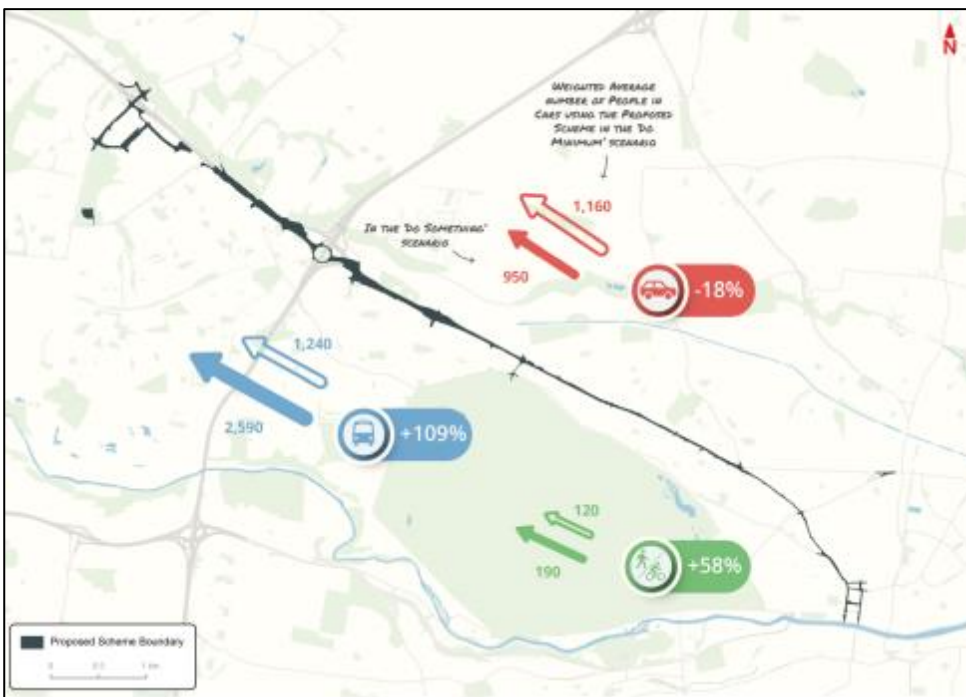


Figure 2.5.6: Extract of Diagram 6.6 People Movement by Mode travelling along the Proposed Scheme during 2028 PM Peak Hour

Offline traffic management measures have been introduced at Charleville Road, Annamoe Road, Monck Place and Phibsborough to minimise general traffic levels and it is noted that access to these side streets and adjacent roads will be available using the surrounding road network.

Residents who wish to travel to North Circular Road, and onwards to their chosen destination, will be able to do so via Cabra Road, with a proposed new right turn at St Peter’s Church.

The Proposed Scheme provides a balance between ensuring that the use of these side streets by through traffic is discouraged at all times, while also ensuring that access by car to local streets, schools and businesses is maintained, via the surrounding road network.

It is not currently possible to facilitate access for local residents only by private vehicle as the current regulations is based on restricting classes of vehicles.

Tables 6.64 and 6.69 in Chapter 6 of Volume 2 of the EIAR forecast a reduction in general traffic flow along Cabra Road and North Circular Road at AM and PM peak hour respectively following the implementation of the Proposed Scheme. Thus, it is forecast that there will be a reduction in general traffic at the junction adjacent to St Peter's Church in the AM and PM peak hours, and on the approach to the Phibsborough Road junction, as a result of the Proposed Scheme.

Due to a reduction in forecasted traffic flows on Cabra Road and North Circular Road, these routes will offer a reasonable alternative journey time.

Section 2.5.3.6 of this report details the traffic assessment process, with reference to TII's Traffic and Transport Assessment Guidelines, as noted in section 6.4.6.2.8 of Chapter 6 of the EIAR.

Rathdown Road / Grangegorman Lower closure has been accounted for in the traffic assessment.

Residents travelling from Prussia Street to Annamoe Park will be able to do so by travelling southbound to the Prussia Street / Manor Street junction, turning right onto Aughrim Street before proceeding onto North Circular Road and then northbound via Annamoe Road.

Connaught Street

With respect to Connaught Street, it is forecasted that there will be an increase of 368 PCUs at AM peak hour and 538 PCUs at PM peak hour. This information is set out in Table 6.65 and Table 6.70 in Chapter 6 of the EIAR.

To determine the impact that this increased traffic flow has on the surrounding area a further assessment has been done in line with the thresholds detailed in section 6.4.6.2.8.2 Significance of the General Traffic Impact – Diagram 6.48.

The assessment has been undertaken by way of a traffic capacity analysis on the associated junctions along the affected link that experience an increase in traffic flow (see section 6.4.6.2.8.7 General Traffic Impact Assessment of Chapter 6 in Volume 2 of the EIAR).

The following is noted in Tables 20 to 23 of Appendix A6.4 Impact Assessments of Volume 4 of the EIAR.

At AM peak hour (2028 and 2043), the Significance of Effect at the Connaught Street junctions, as a result of the Proposed Scheme, has been determined as "Not Significant" in 2028 and ranging from "Not Significant" to "Slight" in 2043.

At PM peak hour (2028 and 2043), the Significance of Effect at the Connaught Street junctions, as a result of the Proposed Scheme, has been determined as ranging between "Not Significant" and "Moderate".

As noted in section 6.2.4.5 of Chapter 6, *potential mitigation and monitoring measures have been considered for assessments that result in a negative impact of significant or higher (i.e. significant, very significant or profound).*

Fassaugh Avenue / Fassaugh Road

The transport assessment has indicated that on Fassaugh Avenue and Fassaugh Road it is forecasted there will be an increase of 351 passenger car units (PCUs) and 260 PCUs respectively in the AM peak hour and an increase of 479 PCUs and 534 PCUs per hour respectively in the PM peak hour following the implementation of the Proposed Scheme.

As noted in Tables 20, 21, 22 and 23 in Appendix A6.4 Impact Assessments for AM and PM peak hour in 2028 and 2043, the Significance of Effect at all the Fassaugh Avenue and Fassaugh Road junctions, as a result of the Proposed Scheme, has been determined as "Not Significant" in relation to the Transport Impact Assessment.

Leinster Street North

The transport assessment has indicated that on Leinster Street North, it is forecast that there will be an increase of 119 PCUs per hour in the AM Peak Hour and an increase of 256 PCUs per hour in the PM Peak Hour following the implementation of the Proposed Scheme. This information is set out in Table 6.65 and Table 6.70 of Chapter 6 of the EIAR.

The following is noted from Tables 20 and 21 of Appendix A6.4 Impact assessments of Volume 4 of the EIAR:

At AM peak hour, 2028 and 2043, the Significance of Effect at the Leinster Street North junctions, as a result of the Proposed Scheme, has been determined as “Not Significant” and “Slight” respectively.

At PM peak hour, 2028 and 2043, the Significance of Effect at the Leinster Street North junctions, as a result of the Proposed Scheme, has been determined as “Not Significant”. This information was inadvertently excluded from Tables 22 and 23 of Appendix A6.4.

The Leinster Street North/ Phibsborough junction and the Leinster Street North/Shandon Road junction 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 changes in traffic volumes, as a result of the Proposed Scheme.

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.

Shandon Road

The transport assessment has indicated that on Shandon Road, it is forecast that there will be an increase of 118 PCUs per hour in the AM Peak Hour and an increase of 256 PCUs per hour in the PM Peak Hour following the implementation of the Proposed Scheme. This information is set out in Table 6.65 and Table 6.70 of Chapter 6 of the EIAR.

The following is noted from Tables 20 to 23 of Appendix A6.4 Impact assessments of Volume 4 of the EIAR:

At AM peak hour, 2028 and 2043, the Significance of Effect at the Shandon Road junctions, as a result of the Proposed Scheme, has been determined as “Not Significant”.

At PM peak hour, 2028 and 2043, the Significance of Effect at the Shandon Road junctions, as a result of the Proposed Scheme, has been determined as ranging between “Not significant and “Moderate”. As noted above, the information relating to the Leinster Street North / Shandon Road junction was inadvertently excluded from Tables 22 and 23 of Appendix A6.4.

St Peter’s Road

The transport assessment has indicated that on St Peter’s Road it is forecasted that there will be a decrease of 226 PCUs at AM peak hour as noted in Table 6.64 of Chapter 6 in Volume 2 of the EIAR.

The transport model indicates that changes in flows on St Peter’s Road at PM peak hour are forecast not to exceed the threshold noted in section 6.4.6.2.8.2 Significance of the General Traffic Impact – Diagram 6.48 of Chapter 6 Traffic Transport in Volume 2 of the EIAR, which is a very low level of change in traffic flow.

Consequently, there are no adverse impact on traffic flows forecasted at St Peter’s National School, as a result of the Proposed Scheme.

Phibsborough Road

As noted in Table 6.65 in Chapter 6 of the EIAR, at AM peak hour, traffic flow is forecasted to increase by 303 PCUs.

As noted in Table 6.70 in Chapter 6, at PM peak hour, traffic flow is forecasted to increase by 249 PCUs.

The following is noted from Tables 20 to 23 of Appendix A6.4 Impact assessments of Volume 4 of the EIAR:

At AM peak hour (2028 and 2043), the Significance of Effect at the Phibsborough Road junctions, as a result of the Proposed Scheme, has been determined as ranging between “Not Significant” and “Slight”.

At PM peak hour (2028 and 2043), the Significance of Effect at the Phibsborough junctions, as a result of the Proposed Scheme, has been determined as ranging between “Not Significant” and “Slight”.

As noted in section 6.2.4.5 of Chapter 6, potential mitigation and monitoring measures have been considered for assessments that result in a negative impact of significant or higher (i.e., significant, very significant or profound).

Berkeley Road

The transport assessment has indicated that on Berkeley Road, it is forecast that there will be an increase of 324 PCUs per hour in the AM Peak Hour and an increase of 228 PCUs per hour in the PM Peak Hour following the implementation of the Proposed Scheme. This information is set out in Table 6.65 and Table 6.70 of Chapter 6 of the EIAR.

The following is noted from Tables 20 to 23 of Appendix A6.4 Impact assessments of Volume 4 of the EIAR:

At AM peak hour, 2028 and 2043, the Significance of Effect at the Berkeley Road junctions, as a result of the Proposed Scheme, has been determined as ranging between “Not Significant” and “Slight”.

At PM peak hour, 2028 and 2043, the Significance of Effect at the Berkeley Road junctions, as a result of the Proposed Scheme, has been determined as ranging between “Slight Positive” and “Not Significant”.

Berkeley Street

The transport assessment has indicated that on Berkeley Street, it is forecast that there will be an increase of 325 PCUs per hour in the AM Peak Hour and an increase of 239 PCUs per hour in the PM Peak Hour following the implementation of the Proposed Scheme. This information is set out in Table 6.65 and Table 6.70 of Chapter 6 of the EIAR.

The following is noted from Tables 20 to 23 of Appendix A6.4 Impact assessments of Volume 4 of the EIAR:

At AM peak hour, 2028 and 2043, the Significance of Effect at the Berkeley Street junctions, as a result of the Proposed Scheme, has been determined as “Not Significant”.

At PM peak hour, 2028 and 2043, the Significance of Effect at the Berkeley Street junctions, as a result of the Proposed Scheme, has been determined as “Not Significant”.

Western Way

The transport assessment has indicated that on Western Way, it is forecast that there will be an increase of 114 PCUs per hour in the AM Peak Hour and an increase of 189 PCUs per hour in the PM Peak Hour following the implementation of the Proposed Scheme. This information is set out in Table 6.65 and Table 6.70 of Chapter 6 of the EIAR.

The following is noted from Tables 6.74, 6.75 and 6.76 of Chapter 6 of Volume 2 of the EIAR and Tables 20 to 23 of Appendix A6.4 Impact assessments of Volume 4 of the EIAR:

At AM peak hour, 2028 and 2043, the Significance of Effect at the Western Way junctions, as a result of the Proposed Scheme, has been determined as ranging between “Not Significant” and “Moderate”. It is noted that the significance of effect noted as “Very Significant” in Table 21 of Appendix A6.4 is erroneous.

At PM peak hour, 2028 and 2043, the Significance of Effect at the Western Way junctions, as a result of the Proposed Scheme, has been determined as ranging between “Not Significant” and “Moderate” in 2028 and “Not Significant” in 2043.

Constitution Hill

The transport assessment has indicated that on Constitution Hill, it is forecast that there will be an increase of 235 PCUs per hour in the AM Peak Hour and an increase of 269 PCUs per hour in the PM Peak Hour following the implementation of the Proposed Scheme. This information is set out in Table 6.65 and Table 6.70 of Chapter 6 of the EIAR.

The following is noted from Tables 6.74, 6.75 and 6.76 of Chapter 6 of Volume 2 of the EIAR and Tables 20 to 23 of Appendix A6.4 Impact assessments of Volume 4 of the EIAR:

At AM peak hour, 2028 and 2043, the Significance of Effect at the Constitution Hill / Western Way junction, as a result of the Proposed Scheme, has been determined as “Moderate”. As noted above, the significance of effect noted as “Very Significant” in Table 21 of Appendix A6.4 is erroneous.

At PM peak hour, 2028 and 2043, the Significance of Effect at the Constitution Hill / Western Way junction, as a result of the Proposed Scheme, has been determined as “Moderate” in 2028 and “Not Significant” in 2043.

Mountjoy Street

The transport assessment has indicated that on Mountjoy Street, it is forecast that there will be an increase of 247 PCUs per hour in the AM Peak Hour and an increase of 241 PCUs per hour in the PM Peak Hour following the implementation of the Proposed Scheme. This information is set out in Table 6.65 and Table 6.70 of Chapter 6 of the EIAR.

The following is noted from Tables 20 to 23 of Appendix A6.4 Impact assessments of Volume 4 of the EIAR:

At AM peak hour, 2028 and 2043, the Significance of Effect at the Mountjoy Street junction, as a result of the Proposed Scheme, has been determined as “Not Significant”.

At PM peak hour, 2028 and 2043, the Significance of Effect at the Mountjoy Street junction, as a result of the Proposed Scheme, has been determined as “Not Significant”.

Church Street

The transport assessment has indicated that on Church Street, it is forecast that there will be an increase of 388 PCUs per hour in the AM Peak Hour and an increase of 362 PCUs per hour in the PM Peak Hour following the implementation of the Proposed Scheme. This information is set out in Table 6.65 and Table 6.70 of Chapter 6 of the EIAR.

Tables 20 to 23 in Appendix A6.4 Impact Assessments of Volume 4 of the EIAR notes the following:

- At AM peak hour (2028 and 2043), the Significance of Effect at the Church Street junctions, as a result of the Proposed Scheme, has been determined as “Not Significant”.
- At PM peak hour (2028), the Significance of Effect at the Church Street junctions, as a result of the Proposed Scheme, has been determined as ranging between “Not Significant” and “Moderate”.
- At PM peak hour (2043), the Significance of Effect at the Church Street junctions, as a result of the Proposed Scheme, has been determined as ranging between “Not Significant” and “Slight”.

As noted in section 6.2.4.5 of Chapter 6, *potential mitigation and monitoring measures have been considered for assessments that result in a negative impact of significant or higher (i.e. significant, very significant or profound).*

Dowth Avenue, White Lane, Royal Canal Bank, Geraldine Street, Goldsmith Street, Shandon Crescent and Shandon Park

At AM and PM peak hour, the change in traffic flows is forecasted to be less than 100 PCUs (i.e., approximately 1 vehicle per minute per direction), which is a very low level of change in traffic flow.

Charleville Road

As noted in Table 6.64 in Chapter 6 of the EIAR, at AM peak hour, traffic flow is forecasted to reduce by 123 PCUs.

At PM peak hour, the change in traffic flows is forecasted to be less than 100 PCUs (i.e., approximately 1 vehicle per minute per direction), which is a very low level of change in traffic flow.

Annamoe Road /Annamoe Terrace

As noted in Table 6.64 and Table 6.69 in Chapter 6 of the EIAR, at AM and PM peak hour, traffic flow is forecasted to reduce by 161 PCUs.

Avondale Road

At AM and PM peak hour, the change in traffic flows is forecasted to be less than 100 PCUs (i.e., approximately 1 vehicle per minute per direction), which is a very low level of change in traffic flow.

As noted in section 6.4.6.3 Operational Phase Summary of Chapter 6 of the EIAR:

There will be an overall reduction in operational capacity for general traffic along the direct study area, given the proposed infrastructural changes to the existing road layout outlined above. This reduction in operational capacity for general traffic will create some level of traffic redistribution from the Proposed Scheme onto the surrounding road network.

The LAM Opening Year 2028 model results were used to identify the impact in traffic flows between the Do Minimum and Do Something scenarios. A reduction in general traffic flows along a road link has been described as a positive impact to the environment. An increase in general traffic flows along a road link has been described as a negative impact to the environment. Reference has been given to TII's Traffic and Transport Assessment Guidelines as an indicator for best practice, to determine the key road links that require further traffic analysis due to the increase in traffic. Operational capacities were extracted from the LAM at the associated junctions of the key road links to identify the impact that the Proposed Scheme will have on the Volume / Capacity ratios.

The results are presented in terms of the significance of the impact to the V / C ratio for each junction based on its sensitivity and magnitude of impact. The results of the assessment demonstrate that the surrounding road network has the capacity to accommodate the redistributed general traffic as a result of the Proposed Scheme. The majority of assessed junctions that required further traffic analysis have V / C ratios that are broadly similar before and after the Proposed Scheme implementation.

*Overall, it has been determined that the impact of the reduction in general traffic flows along the Proposed Scheme will be **Positive, Significant and Long-term** whilst the impact of the redistributed general traffic along the surrounding road network will be **Negative, Slight and Long-term**. Thus, overall, there will be no significant deterioration in the general traffic environment in the study area as a consequence of meeting the scheme objectives of providing enhanced sustainable mode priority along the direct study area.*

Capel Street Closure

Extensive traffic surveys (undertaken Pre-Pandemic in November 2019 and February 2020) were used to develop the base transport models to ensure a robust representation of observed traffic flows in the model. For assessment purposes, the modelling is not undertaken on the base year model but instead on forecast year scenarios representing the Opening Year (2028) and Design Year (2043). This is done to account for planned or implemented changes in the road network and also changes in demand as the population changes and new developments take place. A Do-Minimum scenario is created to represent the likely-receiving environment for the assessment of the schemes (Section 6.4.3, Chapter 6) - *“The ‘Do Minimum’ scenario represents the likely traffic and transport conditions of the direct and indirect study areas without the Proposed Scheme in place. This scenario forms the reference case by which to compare the Proposed Scheme. The opening year for the Proposed Scheme is assumed to be 2028, with a design assessment year (opening + 15 years) assumed to be 2043....For the quantitative analysis (i.e. the transport modelling elements of the impact assessment), the Do Minimum scenario is based on the ‘likely’ conditions of the transport network and include for any known permanent improvements or changes to the road or public transport network that have taken place, been approved or are planned for implementation”*.

The transport models used for the assessment of the Blanchardstown CBC scheme are robust and were up to date at the time of submission. The models included for all the road network updates referred to above (and others) apart from the Capel Street traffic free arrangements. The Capel Street traffic free arrangements were being trialled on a temporary basis during the development, assessment and finalisation of the Blanchardstown CBC scheme and was therefore not included in original EIAR traffic assessment.

Consideration of Capel Street Traffic Free Arrangements

An updated assessment of the potential traffic impacts of the proposed Blanchardstown CBC scheme has been undertaken using the methodology outlined in Chapter 6 of the EIAR, based on the updated receiving environment including for the Capel Street traffic free arrangements for the years 2028 and 2043.

In overall terms, the predicted traffic impacts identified by the updated assessment of the Blanchardstown CBC scheme, are broadly consistent with those already outlined currently in Chapter 6; with some very minor differences identified. In line with the methodology as detailed in Section 6.4.6.2.8.2 of the EIAR, traffic redistribution as a result of the Blanchardstown CBC Scheme (including for the Capel Street traffic free arrangements in both Do Minimum and Do Something scenarios) above the +100 pcu 2-way flow threshold have been identified in the AM and PM peak hours and compared to those currently identified in Chapter 6. This updated assessment has considered, as per the approach and methodology in the original EIAR assessment, the change in traffic flows as measured between the Do Minimum and Do Something scenarios based on this updated receiving environment.

Additional road links identified from the updated assessment over and above those currently identified in Chapter 6 of the EIAR are summarised below for the AM and PM peak periods:

AM Peak

Direct Study Area – One additional street has been identified over and above those already identified in Chapter 6 of the EIAR; with an increase of +111 pcu in the AM Peak on Queen Street which is on the direct study area of the Blanchardstown CBC scheme.

Indirect Study Area - Two additional streets have been identified, with increases slightly above the threshold level of +100 pcu on King Street North (+113 pcu) and Arbour Hill (+103 pcu). Three streets drop below the threshold level based on the updated traffic flows including for the Capel Street traffic free arrangements (Oliver Bond Street, Western Way and James's Street).

PM Peak

Direct Study Area - The results show no additional streets identified on the direct study area in the PM peak above the +100 pcu threshold level.

Indirect Study Area - Four additional streets, in the indirect study area, have been identified over and above those already indicated in Chapter 6 in Volume 2 of the EIAR. Increases in flows on these road links range between +105 and +117 (2-way) flows during the PM peak hour. The increases are predicted on Winetavern Street, O'Donovan Rossa Bridge, Chancery Place and Greek Street, which are all part of a continuous route between High Street and Mary's Lane. Three streets drop below the threshold level based on the updated traffic flows including for the Capel Street traffic free arrangements (Bridgefoot Street, Parnell Street and Thomas Street).

The updated assessment indicates that Not Significant effects are determined at the majority of junctions on the road links where additional traffic flow changes are predicted. Some Slight effects are anticipated along King Street North, although these junctions will continue to operate within capacity (Volume over Capacity ratio of less than 100%).

The redistributed traffic as a result of the Blanchardstown CBC scheme (with or without the Capel Street traffic free arrangements) will not lead to a significant influence on the operational capacity on the surrounding road network and no further mitigation measures are considered necessary beyond those already included in the Blanchardstown CBC scheme.

In conclusion, having undertaken an updated assessment (which takes account of the Capel Street traffic free arrangements), no additional significant changes across the environmental topic of traffic and transport are anticipated when compared to the original assessment that was undertaken in the submitted scheme.

In addition, the operation of the Proposed Scheme does not result in any significant noise or vibration impacts with or without the Capel Street traffic free arrangements in place. In terms of air quality impacts as a result of the Proposed Scheme's operation and with the inclusion of the Capel Street traffic free arrangements are considered neutral and long-term and are consistent with those as outlined in Chapter 7 of the EIAR (without the Capel Street traffic free arrangements).

2.5.3.2 Cumulative Impacts

Summary of issue

Submissions noted that the impacts of the Proposed Scheme on Connaught Street and the surrounding streets should be considered in conjunction with the proposed Ballymun / Finglas to City Centre Core Bus Corridor scheme and suggested that this omission was an "underhand tactic" to create confusion.

Submissions stated that the impacts will increase when the Ballymun / Finglas to City Centre Core Bus Corridor scheme comes into effect.

Response to issue

The impacts of the Proposed Scheme were considered in conjunction with the other Core Bus Corridor schemes including the Ballymun / Finglas to City Centre Core Bus Corridor scheme.

Chapter 21 Cumulative Impacts & Environmental Interactions of Volume 2 of the EIAR reports the assessment of cumulative impacts of the Blanchardstown to City Centre Core Bus Corridor Scheme (hereafter referred to the Proposed Scheme) in combination with other existing and or approved projects and projects which, at the time of assessment, were yet to be approved, but for which a decision on such project is reasonably foreseeable over the likely consenting and construction period anticipated for the Proposed Scheme. In addition, the chapter addresses the potential for interactions between impacts on different environmental factors of the Proposed Scheme itself on the receiving environment.

Annex IV of the EIA Directive (2011/92/EU as amended by 2014/52/EU) requires that an EIAR provides a 'description of the likely significant effects of the project on the environment resulting from...the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources.'

This chapter identifies and provides an assessment of likely significant cumulative effects caused by the Proposed Scheme in combination with other planned projects. This includes consideration of the potential effects of the other BusConnects Core Bus Corridor Schemes as well as other projects (e.g., Metrolink, DART+). Section 21.2 sets out the process for deciding which other planned projects were included in the assessment.

As noted in Section 21.1.2 of Chapter 21 in Volume 2 of the EIAR:

The first stage of the cumulative effects assessment was to identify other projects deemed potentially relevant to be included in the long list. While the EIA Directive only requires the consideration of other existing and/or approved projects, this assessment has gone further in that it is assumed that the BusConnects Dublin - Core Bus Corridors Infrastructure Works (i.e., the 12 BusConnects Core Bus Corridor schemes) will be undertaken over a circa six year period (with construction commencing in 2023 subject to approval being granted). There is also potential for a number of other projects to receive approval and be progressed within that time period which may give rise to cumulative effects in combination with the Proposed Scheme. It was, therefore, considered appropriate to identify projects which, at the time of assessment, were yet to be approved, but for which a decision and potentially approval is reasonably foreseeable over the likely consenting and construction period anticipated for the Proposed Scheme.

As noted in Section 21.6 of Chapter 21 in Volume 2 of the EIAR:

The assessments assume all 12 proposed Bus Corridor Schemes would be operational, along with other identified projects and GDA Strategy projects included in the Do Minimum and Do Something scenarios. For traffic and transport, the assessment predicted that the Proposed Scheme and the other 11 Core Bus Corridor schemes are expected to facilitate a long term, profound positive cumulative effect on People Movement by sustainable modes.

The Core Bus Corridor schemes are seen to enable significant improvements in People Movement by sustainable modes along the direct Core Bus Corridor routes, particularly by bus and cycling, with reductions in car mode share due to the enhanced sustainable mode provision. The Proposed Scheme and the other 11 Core Bus Corridor schemes provide for enhanced integration and efficiencies for all public transport modes by facilitating substantial increases in public transport average network wide travel speeds.

The climate impact assessment predicts a negative, significant and permanent cumulative impact on climate during the maintenance phase. A significant and positive impact is predicted on climate in 2028 with a neutral impact in 2043 due to the predicted cumulative change in operational traffic and the significant mode shift from car to more sustainable modes (walking, cycling and public transport). Fewer climate benefits are seen in 2043 relative to 2028 due to the further electrification of the wider fleet in both the Do Minimum and Do Something scenarios.

The Core Bus Corridor Infrastructure Works will also support the delivery of government strategies outlined in the CAP (DCCA 2019) and the 2021 Climate Act by enabling sustainable mobility and delivering a sustainable transport system. The Core Bus Corridor Infrastructure Works will provide connectivity and integration with other public transport services leading to more people availing of public transport, helping to further reduce GHG emissions.

Based on the analysis outlined above, it is concluded that the Core Bus Corridor Infrastructure Works 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 Core Bus Corridor Infrastructure Works has the potential to reduce GHG emissions equivalent to the removal of approximately 105,500 and 102,200 car trips per weekday from the road network in 2028 and 2043 respectively. This represents a very 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) (DCCA 2021). It is concluded that, cumulatively, the Core Bus Corridor Infrastructure Works will make a significant contribution to carbon reduction.

2.5.3.3 Lack of Public Consultation on proposed traffic management measures

Summary of issue

Submissions stated that road restrictions changes proposed for Monck Place, Phibsborough, Charleville Road and Annamoe Road were not set out in any previous designs circulated for public consultation and are a significant departure from previously consulted proposals.

Submissions also stated that none of the proposed restrictions appeared in the final Preferred Route Option report dated March 2022.

Submissions noted that changes were negotiated at a local level with some residents' groups, to ensure their roads does not become a 'rat-run', with "dire" consequences for the Connaught Street area.

Submissions stated that the proposals do not address concerns previously raised by Connaught Street Resident's Association about the impact on Fassagh Avenue, Fassagh Road and Connaught Street.

The submissions stated that the NTA has been inconsistent and unfair in its responses to local concerns, failing to address all major local adverse impacts, and creating new problems whilst addressing problems elsewhere.

A submission stated they felt "blind-sided" by the recent changes.

Response to issue

As noted in Appendix B - Public Consultation Submission Report 1st Non-Statutory Public Consultation of the Preferred Route Option Report:

Consultation on the Blanchardstown to City Centre emerging preferred route lasted for a period of four and a half months, between the 14th November 2018 and the 29th March 2019.

As noted in Appendix C - Public Consultation Submission Report 2nd and 3rd Non-Statutory Public Consultation of the Preferred Route Option Report:

The second round of non-statutory public consultation for the CBC took place from the 4th March 2020 to 17th April 2020 on the draft Preferred Route Option (PRO).

The third round of non-statutory public consultation for the CBC took place from the 4th November 2020 to 16th December 2020 on the updated draft PRO.

As part of the third round of non-statutory public consultation, at the request of the Annamoe Resident's Group, a meeting was held with the NTA on 19th November 2020 and on 17th February 2021.

At the request of representatives of Monck Place, Avondale Road, Avondale Avenue, Leslie's Buildings and Great Western Square Road, a meeting was held with the NTA on 18th November 2020 and on 24th February 2021.

Refer to section 2.5.3.4 of this report which summarises the submissions from 15 residents of Monck Place, Avondale Avenue and Leslie's Buildings, some of whom attended the above noted meetings held on 18th November 2020 and 24th February 2021. Their submissions stated that the proposed traffic management measures at Monck Place and Phibsborough are in line with their requests.

The Public Consultation Report contains a comprehensive summary of the Non-Statutory Public Consultations and Stakeholder Engagement processes for the Core Bus Corridor Infrastructure Works as a whole (refer also to section 1.6 of Chapter 1 in Volume 2 of the EIAR). It also provides a detailed record of the individual consultation and engagement processes for the Blanchardstown to City Centre Core Bus Corridor Scheme through each round of consultation.

The lengthy and extensive public consultation phases ensured the views and observations of a large number of key stakeholders and the general public were received and considered. The public consultation and engagement process has resulted in a considerable level of public awareness and understanding of the BusConnects CBC Infrastructure Work's aims and objectives. It has also led to the BusConnects Infrastructure team having a keen appreciation of the many stakeholder issues and to be able to consider them during the draft design and planning phases of the Proposed Scheme. In conclusion, the non-statutory public consultation rounds provided local and informative insights; allowed for considerable discourse and engagement and in many cases enhanced aspects of the draft designs. The public consultation has ensured that the BusConnects Infrastructure team were cognisant of stakeholder feedback and appraised of many local considerations as the designs evolved.

The statutory public consultation process ensured full and effective public participation, which consisted of a period for inspection of the planning documentation and for the making of submissions. It is noted that as a result of this statutory consultation process, 65 submissions have been received with respect to the proposed traffic management measures and the impact on the Phibsborough area as a result of the Proposed Scheme.

With respect to the comment that the proposed traffic management restrictions are not included in final Preferred Route Option Report, as noted in the list of main scheme changes between the published EPR option and the PRO proposals on page 5 of this document, *Offline traffic management measures have been introduced to minimise general traffic levels on side streets.*

The Preferred Route Options Report Appendix A General Arrangement drawings also indicate the proposed traffic management measures.

Refer to section 2.5.3.1 for details of traffic flow impacts on Fassaugh Avenue, Fassaugh Road and Connaught Street.

As noted in Section 6.4.6.3 Operational Phase Summary, in Chapter 6 Traffic & Transport of Volume 2 of the EIAR:

The results of the assessment demonstrate that the surrounding road network has the capacity to accommodate the redistributed general traffic as a result of the Proposed Scheme. The majority of assessed junctions that required further traffic analysis have V/C ratios that are broadly similar before and after the Proposed Scheme implementation.

Overall, it has been determined that the impact of the reduction in general traffic flows along the Proposed Scheme will be **Positive, Significant and Long-term** whilst the impact of the redistributed general traffic along the surrounding road network will be **Negative, Slight and Long-term**.

2.5.3.4 Support for the Proposed Changes

Summary of issue

A number of submissions from residents residing in Monck Place, Avondale Avenue and Leslie's Buildings have expressed their support for the proposed traffic management measures in their area.

The submissions noted that the NTA has actively and positively engaged with the community during the design and planning stage. It is stated that the residents set out at meetings with the NTA their concerns about additional traffic using their streets as a 'rat-run' as a result of the proposed CBC scheme, along with the road closure at Grangegorman by DCC.

The submissions acknowledged that the proposed changes would reduce ease of access for residents of local roads in the area, however it is stated that this is preferred over increased traffic on these side roads.

The submissions commended the NTA for their meaningful and positive engagement with the local community and confirmed support for the proposed traffic management measures.

Response to issue

The NTA welcomes the comments noted in the submissions and confirms that the proposed traffic management measures will limit the use of Monck Place and Phibsborough as a short-cut route by through traffic.

The transport model indicates that changes in flows on Monck Place, Avondale Road, Avondale Avenue, Great Western Square and Phibsborough are forecast not to exceed the threshold noted in section 6.4.6.2.8.2 Significance of the General Traffic Impact – Diagram 6.48 of Chapter 6 Traffic Transport of Volume 2 of the EIAR., which is a very low level of change.

2.5.3.5 Air Quality

Summary of issue

A number of submissions stated that there will be an increase in air pollution due to the increase in traffic in the Phibsborough and Cabra areas, yet no mitigation measures are proposed.

A submission also stated that Phibsborough Road and Old Cabra Road are forecasted to experience an increase in traffic flow however the air quality results at these locations are not provided.

Submissions also stated that there will be an increase in air pollution on Charleville Road as a result of the Proposed Scheme.

A submission quoted the results from Chapter 7 Air Quality of Volume 2 of the EIAR and stated that the receptor locations in Phibsborough shown in Figures 7.3 to 7.5 are only identified by ITM co-ordinates and cannot be linked to the actual locations.

Submissions stated that waiting until 2048 is not acceptable for ambient air quality to be expected in all locations. The submission also stated that no government project should result in deterioration of air quality which is what BusConnects appears to be proposing for Phibsborough.

A submission noted that Dublin City Council should respect the maximum emission levels permitted in residential areas according to the World Health Organisation and authorised by the European Union and noted an upper limit for NO₂ of 40 micrograms per cubic metre (ug/m³).

A submission requested that air quality and noise monitors be installed with mitigation measures implemented in the event of pollution levels exceeding WHO and European Environment baselines.

Another submission requested a low emission zone to be established in Phibsborough which would trigger once there is a reduction in air quality.

Response to issue

In terms of operational impacts, 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).

- As shown on figure 7.3 of Volume 3 of the EIAR, the receptors in the Phibsborough / Cabra area will experience a negligible impact in terms of the annual mean NO₂ concentration.
- As shown on figure 7.4 of Volume 3 of the EIAR, the receptors in the Phibsborough /Cabra area will experience a negligible impact in terms of the annual mean PM₁₀ concentrations.
- As shown on figure 7.5 of Volume 3 of the EIAR, the receptors in the Phibsborough /Cabra area will experience a negligible impact in terms of the annual mean PM_{2.5} concentration.

There are receptors located on Phibsborough Road which has been assessed as Negligible and there are receptors located on Old Cabra Road which have been assessed as Negligible to Slight Beneficial; these are shown in Figures 7.3 to 7.8 of Chapter 7 Air Quality of Volume 3 of the EIAR.

Charleville Road was not assessed for predicted change in air quality as the forecasted change in traffic volumes did not meet the criteria for detailed assessment, i.e., the annual average daily traffic (AADT) does not change by 1,000 or more.

The EPA is the competent authority with responsibility for air quality monitoring in Ireland. The EPA carries out air quality monitoring of various parameters at numerous locations across Dublin. Real-time data is provided along the Proposed Scheme at Blanchardstown, Phoenix Park and Cabra (<https://airquality.ie/readings>).

In addition, the EPA publishes an annual report summarising the results of the monitoring countrywide. Results are compared in this annual report to both air quality standards and World Health Organisation (WHO) guidelines

2.5.3.6 *Noise Pollution*

Summary of issue

Submissions raised concerns that there will be an increase in noise pollution in the area as a result of the Proposed Scheme.

Submissions raised concerns that due to an increase in traffic in Charleville Road therefore there will be an increase in noise pollution.

A submission raised concerns about the increase in noise on Cabra Road / Dalymount.

Response to issue

Section 9.4.4 of Chapter 9 ‘Noise and Vibration’ of Volume 2 of the EIAR assesses the potential impacts of the Operational Phase on noise and vibration levels of the Proposed Scheme.

As noted in section 9.4.4.1.1 of Chapter 9:

“the output of the traffic modelling has been used to undertake a detailed analysis of traffic noise levels changes.”

As noted in Figure 9.4 (Opening Year 2028 Traffic Noise Impact Summary) of Volume 3 of the EIAR, an impact ranging between “Imperceptible/Positive” and “Slight-Moderate” is forecast in the Phibsborough area as a result of the Proposed Scheme.

As noted in Figure 9.5 (Design Year 2043 Traffic Noise Impact Summary) of Volume 3 of the EIAR, an impact ranging between “Imperceptible/Positive” and “Slight” is forecast in the Phibsborough area as a result of the Proposed Scheme.

As noted in Figure 9.4 (Opening Year 2028 Traffic Noise Impact Summary) and Figure 9.5 (Design Year 2043 Traffic Noise Impact Summary) of Volume 3 of the EIAR, an “Imperceptible/Positive” impact is forecast on Charleville Road as a result of the Proposed Scheme.

The impact of the Proposed Scheme on Noise Levels on Cabra Road in the Opening Year 2028 has been assessed as “Imperceptible / Positive” as shown in Figure 9.4 of Volume 3 of the EIAR and ranging between “Imperceptible / Positive” and “Not Significant” in the Design Year 2043, as noted in Figure 9.5 of Volume 3 of the EIAR.

2.5.3.7 Flawed Classification System

Summary of issue

Submissions stated that in Appendix A6.4 Impact Assessments Volume 4 of the EIAR, the following are estimated when comparing a ‘do minimum’ with a ‘do something’ scenario at PM peak hour:

- An 80% increase in hourly traffic flows at junction of Connaught Street and Shandon Crescent
- A 55% increase in hourly traffic flows at junction of Fassauga Avenue and Dingle Road
- A 64% increase in hourly traffic flows at junction of Fassauga Avenue and Bannow Road

Submissions also stated that each is described as having “not significant” effect and “negligible” impact.

The submissions noted that there is an increase of 70% in peak hourly traffic flows at the junction of Connaught Street and St Peter’s Road. The submissions went on to state that this was described as having a “low impact” with “moderate effect”. The submissions affirmed that it appears that only areas that are forecasted to experience increases in traffic volume beyond 85% of road capacity are classified as having any impact.

The submissions stated that the classification minimises and deliberately downplays the traffic impacts arising from the proposed changes and this is simply inappropriate both for vulnerable road users and for those living in the area.

Response to issue

As noted in section 6.4.6.2.8.2 Significance of the General Traffic Impact of Chapter 6 Traffic & Transport of the EIAR:

To determine the impact that the Proposed Scheme has in terms of general traffic redistribution on the direct and indirect study areas, the LAM Opening Year 2028 model results have been used to identify the difference in general traffic flows between the ‘Do Minimum’ and ‘Do Something’ scenarios and the associated level of traffic flow difference as a result of the Proposed Scheme. The assessment has been considered with reference to both the reductions and increases in general traffic flows along road links.

Significance of an Increase in General Traffic: *To determine the potential 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).*

This document is considered best practice guidance for the assessment of transport impacts related to changes in traffic flows due to proposed developments and is an appropriate means of assessing the impact of general traffic trip redistribution on the surrounding road network.

Figure 2.5.7 provides a snapshot from the guidance which outlines “Advisory Thresholds for Traffic and Transport Assessment Where National Roads are Affected”.

Where applications affect national roads a Transport Assessment should be requested if the thresholds in Table 2.2, below, are exceeded.

Table 2.2 Advisory Thresholds for Traffic and Transport Assessment Where National Roads are Affected

Vehicle Movements	100 trips in / out combined in the peak hours for the proposed development
	Development traffic exceeds 10% of turning movements at junctions with and on National Roads.
	Development traffic exceeds 5% of turning movements at junctions with National Roads if location has potential to become congested or sensitive.

Traffic and Transport Assessment Guidelines PE-PDV-02045 May 2014, TII Publications

Figure 2.5.7: Extract from TII Guidelines for Traffic and Transport Assessments (May 2014)

The basis of the guidance is to assess the impacts of additional trips that have been generated as part of a new development (for example, a new housing estate etc.). Noting that the guidance relates to National Roads only, for the purpose of this assessment, the principles of the guidance have been adapted for the assessment of the Proposed Scheme. This has been achieved by extending the threshold to cover all road types in the vicinity of the Proposed Scheme, not only National Roads. This ensures a robust and rigorous assessment has undertaken and that potential impacts on more localised or residential streets have been captured as part of the assessment.

The impact assessment of increases to the general traffic flows has used the following thresholds based on the above guidelines:

- **Local / Regional Roads:** Traffic redistribution results in an increase above 100 combined flows (i.e. in a two-way direction) along residential, local and regional roads in the vicinity of the Proposed Scheme in the AM and PM peak hours;
 - The threshold aligns with an approximate 1 vehicle per minute increase per direction on any given road. This is a very low level of traffic increase on any road type and ensures that a robust assessment of the impacts of redistributed traffic has been undertaken.
- **National Roads:** Traffic exceeds 5% of the combined turning flows at junctions with/ on/or with national roads in the AM and PM peak hours as a result of traffic redistribution comparing the 'Do Minimum' to the 'Do Something' scenario with the Proposed Scheme in place.
 - The guidelines indicate that a 10% threshold may be used, however, to ensure a rigorous assessment in this instance the lower 5% threshold for turning movements has been utilised.

Where road links have been identified as experiencing additional general traffic flow increases which exceed the above thresholds, further assessment has been undertaken by way of a traffic capacity analysis on the associated junctions along the affected links.

As noted in section 6.4.6.2.8.7 General Traffic Impact Assessment of Chapter 6 of the EIAR:

Following the above threshold assessment, the following three-step approach has been undertaken to determine the significance of the negative impact as a result of the redistributed general traffic on the indirect study area:

Step 1 - Determination of Junction Sensitivity: Where road links experience additional traffic volumes of above the proposed thresholds, a review has been undertaken of its associated junctions using the following categories:

- **High Sensitivity (Category 5)** – Roads that cater for a lower volume of traffic than Category 4 with a lower speed limit (30km/h);
- **Medium Sensitivity (Category 4)** – Roads that can cater for a high volume of traffic with a moderate speed limit (30km/h – 50km/h), connecting neighbourhoods;
- **Low Sensitivity (Category 3)** – Roads that interconnect Category 2 type roads with a lower level of mobility than national roads; and

- **Negligible Sensitivity (Category 1 and Category 2)** – Roads that can cater for a high volume of traffic with a high speed limit (100km/h - 120km/h), between major metropolitan cities, i.e. national primary and secondary roads.

The above sensitivities / categories establish the characteristics of the surrounding road network impacted by the Proposed Scheme. The road link characteristics of the major arm of a junction has been used to determine the junction sensitivity. This has allowed for the identification of where more sensitive locations, in particular Category 5 roads / junctions, are impacted.

Step 2 – Determination of the Magnitude of Impact using Junction Analysis: To understand the magnitude impact of the redistributed traffic, operational capacities have been extracted from the LAM.

The capacity of junctions within the LAM are expressed in terms of Volume to Capacity ratios (V / C ratios). The V / C ratios represent the operational efficiency for each arm of a junction. For the purpose of this EIAR, operational capacity outputs of a junction have been identified with reference to the busiest arm which experiences the maximum V/C ratio.

A V / C ratio of below 85% indicates that a junction is operating well, has spare capacity, and that traffic does not experience queuing or delays throughout the hour. A value of 85% to 100% indicates that the junction is approaching its theoretical capacity with traffic possibly experiencing occasional queues and delays within the hour. A value of over 100% indicates that a junction is operating above its theoretical capacity and traffic experiences queues and delays regularly within the hour. The junctions have been described in the ranges outlined in Table 6.72 (reproduced in Table 2.5.2.below).

Table 2.5.2: Junction Volume / Capacity Ranges

V / C Ratio	Traffic Condition
≤85%	A junction is operating well within theoretical capacity.
85% - 100%	A junction is approaching theoretical capacity and may experience occasional queues and delays within the hour.
≥100%	A junction is operating above its theoretical capacity and experiences queues and delays quite regularly within the hour.

When comparing the V / C ratios during the Do Minimum and Do Something scenarios for the key junctions, the terms outlined in Table 6.73 (reproduced in Table 2.5.3) have been used to describe the impact.

Table 2.5.3: Magnitude of Impact of Redistributed Traffic

		Do Something		
		≤85%	85% - 100%	>100%
Do Minimum	≤85%	Negligible	Low Negative	High Negative
	85% - 100%	Low Positive	Negligible	Medium Negative
	>100%	Medium Positive	Low Positive	Negligible

As indicated in Table 2.5.3, the changes in V / C ratios between the Do Minimum and Do Something scenarios result in either a positive, negative or negligible magnitude of impact. **Step 3 – Determination of Significance of Effects:** The magnitude of impact has been combined with the sensitivity of the road link to determine the Significance of Effect using the matrix shown in Table 6.4 (reproduced as Table 2.5.4 below) which is based upon the EPA Guidelines (EPA 2022).

Table 2.5.4: Significance of Effects Matrix for Traffic and Transport Chapter

		Sensitivity of Existing Environment			
		High	Medium	Low	Negligible
Description Impact	High	Profound	Very Significant	Moderate	Slight
	Medium	Very Significant	Significant	Moderate	Not Significant
	Low	Moderate	Moderate	Slight	Not Significant
	Negligible	Not Significant	Not Significant	Not Significant	Imperceptible

Potential mitigation measures have been considered at junctions where the Significance of Effect is predicted to be Significant or higher. At junctions where a moderate effect or lower is predicted, further consideration has not been undertaken as moderate effects represent that which effects the ‘character of the environment in a manner that is consistent with existing and emerging baseline trends’ (as per Table 6.5).

The above analysis was carried out on the following scenarios:

- 2028 Opening Year – Do Minimum vs Do Something – AM Peak Hour;
- 2043 Design Year (Opening Year + 15 Years) – Do Minimum vs Do Something – AM Peak Hour;
- 2028 Opening Year – Do Minimum vs Do Something – PM Peak Hour; and
- 2043 Design Year (Opening Year + 15 Years) – Do Minimum vs Do Something – PM Peak Hour.

The AM and PM Peak Hour flows are modelled as occurring between 08:00 to 09:00 and 17:00 to 18:00 respectively. The interpeak periods have not been analysed for this impact assessment as the AM and PM Peak Hour flows present an overall worst-case scenario. The full analysis tables for each scenario, demonstrating the Do Minimum and Do Something Peak Hour traffic flows and maximum V / C ratio for each junction assessed is detailed in Table 25 to Table 28 of Appendix A6.4.4 (General Traffic Assessment). The tables shown in this section show only those junctions with a predicted Significance of Effect of Slight or higher. A full list of junctions is included in Appendix A6.4.4 (General Traffic Assessment) in Volume 4 of this EIAR.

Consequently, for the Connaught Street / Shandon Crescent junction, the junction sensitivity is classified as ‘Medium’ with a V/C ratio of $\leq 85\%$ in both the ‘Do Minimum’ and ‘Do Something’ scenarios. This has a ‘Negligible’ Magnitude of Impact. Based on Table 6.4 of the EIAR, this Significance of Effect is ‘Not Significant’.

Likewise, for the Fassauga Avenue / Dingle Road junction, the junction sensitivity is classified as ‘High’ with a V/C ratio of $\leq 85\%$ in both the ‘Do Minimum’ and ‘Do Something’ scenarios. This has a ‘Negligible’ Magnitude of Impact. Based on Table 6.4 of Chapter 6 of the EIAR, this Significance of Effect is ‘Not Significant’.

For the Fassauga Avenue / Bannow Road junction, the junction sensitivity is classified as ‘Medium’ with a V/C ratio of $\leq 85\%$ in both the ‘Do Minimum’ and ‘Do Something’ scenarios. This has a ‘Negligible’ Magnitude of Impact. Based on Table 6.4 of Chapter 6 of the EIAR, this Significance of Effect is ‘Not Significant’.

2.5.3.8 Inadequate referencing and lack of consistency in documentation

Summary of issue

The submission stated that Diagram 6.4 in Chapter 6 is referenced as extracted from Figure 6.7 in Volume 3 of the EIAR. However, the submission has challenged this noting that the Cabra / Phisborough area is not included on the map.

In addition, it noted that it is unclear if the referenced diagram accounts for traffic flow effects for all the proposed core bus corridor schemes, noting that at a meeting in July 2022, they were informed by the NTA that the traffic flows in Chapter 6 of the EIAR relate to the Blanchardstown CBC scheme only.

Response to issue

It is assumed that the submission is referring to diagram 6.24 in Chapter 6 as being an extract from Figure 6.7 in Volume 3 of the EIAR.

Due to an administrative error, the correct version of 6.1 to 6.12 in Volume 3 of the Environmental Impact Assessment Report were not available on the NTA website (www.blanchardstownscheme.ie) during the initial period for inspection and for the making of submissions/observations that ended on 30th August 2022 (although these figures were available for inspection at (i) the offices of the NTA, (ii) the offices of An Bord Pleanála and (iii) on the website of An Bord Pleanála at <https://www.pleanala.ie/en-ie/case/313892> . This error was rectified on the NTA website for the Blanchardstown to City Centre Core Bus Corridor Scheme on 31 August 2022.

Consequently, a further period of time for inspection and for the making of submissions/observations was provided for the Blanchardstown to City Centre Core Bus Corridor Scheme, as applied for under Section 51(2) of the Roads Act 1993 (as amended). This period of time was between 8th September 2022 and 3rd November 2022, which was advertised on 8th September 2022.

As noted in section 6.1 Introduction of Chapter 6 of the EIAR:

This Chapter of the Environmental Impact Assessment Report (EIAR) has considered the potential traffic & transport impacts associated with the Construction and Operational Phases of the Blanchardstown to City Centre Scheme (hereafter referred to as the Proposed Scheme).

Refer to section 2.5.3.2 above which provides further details as to what is included in Chapter 21 Cumulative Impacts & Environmental Interactions of Volume 2 of the EIAR.

2.5.3.9 Discrepancies in drawings

Summary of issue

The submission stated that the drawings are unclear, noting that information on drawings is illegible with discrepancies and inconsistencies with the compulsory purchase order deposit maps, as noted below.

Charleville Road

The submission stated that the information contained within the CPO documentation for the proposed traffic management measure on Charleville Road is inconsistent with the information on the relevant General Arrangement drawing. The submission noted that ‘CUL-DE-SAC EXCEPT BICYCLES’ would indicate that the road is not open to traffic in either direction, and the drawing shows a ‘NO THROUGH ROAD SIGN’ which is unclear as to whether this is for one or both directions.

Annamoe Terrace & Road

The submission stated that the information within the CPO documentation for the proposed traffic management measure on Annamoe Road is inconsistent with the information on the relevant General Arrangement drawing as the proposed traffic sign ‘NO THROUGH ROAD’ would suggest that the road is closed to traffic in both directions.

The submission objected to the proposed road closures and restrictions as it will impact negatively on residents to access Lidl supermarket on Old Cabra Road and the Phoenix Park, noting the increase in traffic it will bring to Connaught Street which will impact on safety of residents.

Response to issue

The drawings within Volume 3 of the EIAR are set at a scale of 1:500 @A1 paper size and 1:1000@ A3 paper size, and therefore the information on the drawings was deemed legible at these scales. It should be noted that all drawings were available for downloading or purchasing, during the statutory consultation period.

Charleville Road

Part III (Section B) ‘Description of public rights of way to be restricted or otherwise interfered with’ of the CPO schedule notes:

“All rights of vehicular traffic (except pedal cycles and other bicycles) in a southeast-bound direction (from Charleville Road to North Circular Road) over that section of the public right of way at the junction of Charleville Road and North Circular Road in the County of Dublin....”

As shown in Figure 2.5.8 below (extract from Department of Transport Traffic Signs Manual - Chapter 4), a Cul-De-Sac sign should be posted at entrance to roads which have no other outlet as per Figure 2.5.9.

The traffic sign (Figure 2.5.10) shown on the General Arrangement drawing below (Figure 2.5.11), indicates the location of the traffic sign face and sign pole, which shows that traffic is restricted from proceeding in a southeast direction.

Consequently, the traffic management measures shown on the General Arrangement drawing is consistent with the information contained within the CPO schedule.

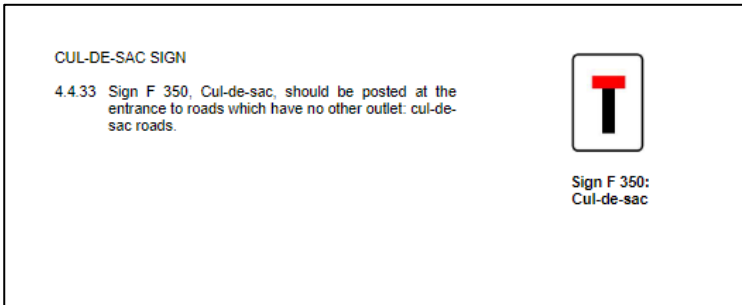


Figure 2.5.8: Extract from Traffic Signs Manual (Chapter 4)

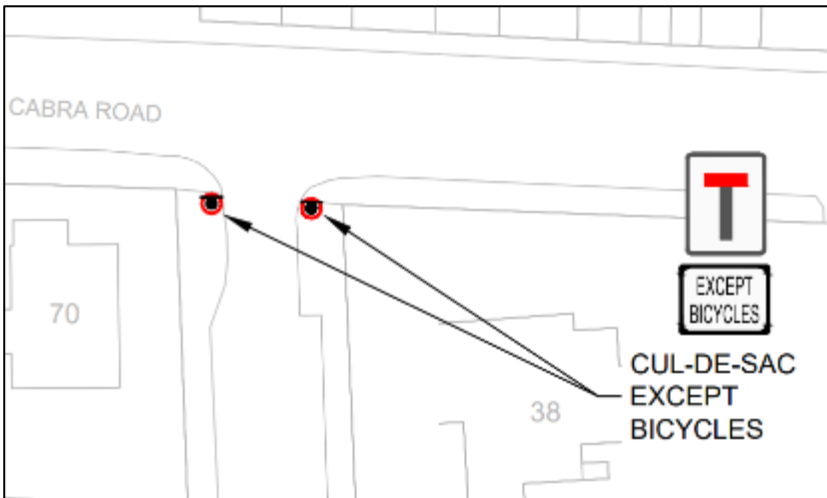


Figure 2.5.9: Extract from General Arrangement Drawing

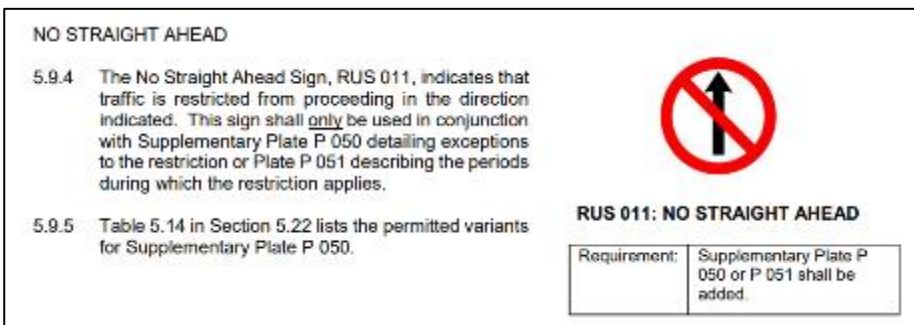


Figure 2.5.10: Extract from Traffic Signs Manual (Chapter 5)



Figure 2.5.11: Extract from General Arrangement Drawing

Annamoe Terrace and Road

Part III (Section B) ‘Description of public rights of way to be restricted or otherwise interfered with’ of the CPO schedule notes:

“All rights of vehicular traffic (except pedal cycles and other bicycles) in a southwest-bound direction (from Annamoe Road and Annamoe Terrace to Annamoe Road) over that section of the public right of way at the junction of Annamoe Road and Annamoe Terrace in the County of Dublin...”

The traffic sign shown in Figure 2.5.12 below, indicates the location of the traffic sign face and sign pole, which shows that traffic is restricted from proceeding in a southwest direction.

Consequently, the traffic management measures shown on the General Arrangement drawing is consistent with the information contained within the CPO schedule.

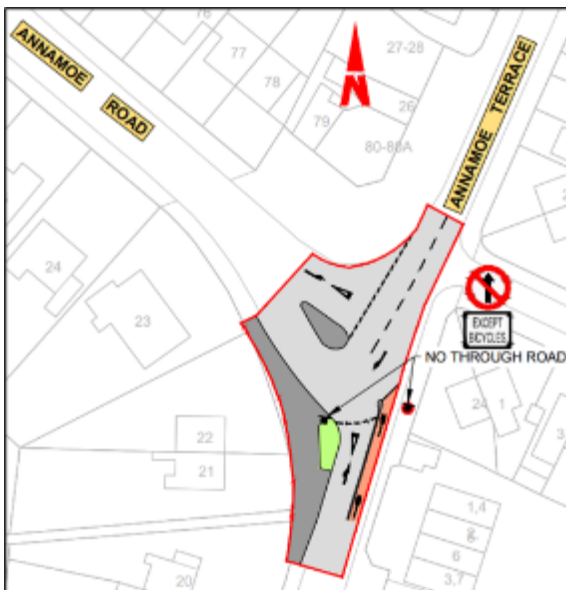


Figure 2.5.12: Extract from General Arrangement Drawing

Access to Lidl supermarket and Phoenix Park is available via Cabra Road and North Circular Road. Refer to section 2.5.3.1 of this report which provides details of the forecasted reduction in traffic on Cabra Road and North Circular Road.

2.5.3.10 Cabra Road / North Circular Road Junction (@ St Peter's Church)

Summary of issue

Submissions stated that the proposed right-turn movement from Old Cabra Road to North Circular Road confirmed at the meeting with the NTA in July 2022 is not shown on the relevant General Arrangement drawing.

Submissions stated that this junction will be taking additional traffic which in its current state is unsafe.

A submission stated that commuting traffic travelling into the City Centre via Cabra Road will continue straight ahead, and not use this junction.

In addition, submissions noted that there is no evidence that a turning movement by HGV vehicles has been evaluated, right-hand turns will cause traffic and safety problems and there is no indication that a safety audit has been carried out to ascertain how this proposed change will affect vulnerable road users, with no evidence as to how this will affect traffic flow in the area.

A submission suggested that the left turn movement at St Peter's Church junction from the North Circular Road is physically not practical.

Submissions expressed concern about cycle safety at the junction, noting there will be increased traffic flow at the junction as a result of the Proposed Scheme.

A submission raised concerns about how to access 22 Avondale Road from the M50 with the traffic management proposals in place.

Submissions noted that the crossing point at this junction is used by schoolchildren and the elderly, and due to the additional movements to be accommodated, this will cause delays for pedestrians.

Response to issue

The road markings on the General Arrangement drawing indicate a right turn arrow on Old Cabra Road and a left turn arrow on North Circular Road. Refer to Figure 2.5.13. This is replicated on the relevant Traffic Signs and Road Marking drawing.

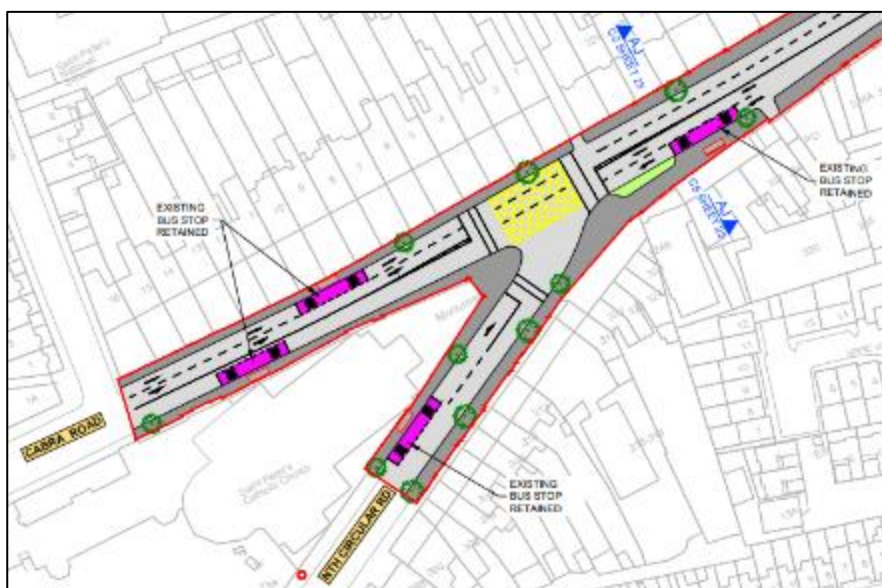


Figure 2.5.13: Extract from General Arrangement drawing

As noted in section 2.5.3.1 of this report, traffic flows are forecast to reduce along Cabra Road and North Circular Road at AM and PM peak hour following the implementation of the Proposed Scheme.

Thus, it is forecast that there will be a reduction in general traffic at the junction adjacent to St Peter's Church in the AM and PM peak hours.

In addition, section 4.5.5.1 of Chapter 4 of the EIAR states the following:

To provide an alternative route for general traffic to and from the City Centre (along Cabra Road, North Circular Road, Infirmary Road and Conyngham Road), the Cabra Road (Dalymount) / North Circular Road junction will be modified to allow right turns from Cabra Road (Dalymount) to North Circular Road and left turns from North Circular Road onto Cabra Road (Dalymount).

The modified junction will include a new direct pedestrian crossing of North Circular Road on the east side of the junction. This new crossing of North Circular Road will improve overall pedestrian accessibility at this location. The number of signal stages at the junction will increase to suit the revised junction operation – and will include three signal stages for traffic, with one stage for each arm, and an 'all-red' signal stage for pedestrian movements.

As noted in section 4.9 of the Preliminary Design Report of the Supplementary Information, swept path analysis has been carried out on junctions, along with a summary of vehicles used, which includes an articulated vehicle. Figure 2.5.14 and Figure 2.5.15 below show the swept path of an articulated HGV in both directions. This indicates that an HGV can safely manoeuvre within the junction, and as noted above, each arm of the junction will have its own traffic signal stage.

It should be noted however that HGVs are restricted from entering areas of Dublin City as per the Dublin City Council HGV Management Strategy. The restrictions, which includes east of the Navan Road / Ashtown Road junction, are in place between 7am and 7pm, however a permit can be acquired to enter during these hours for particular reasons.

Consequently, the number of articulated HGV's passing through this junction will be extremely low with the overwhelming majority of this number taking place at off-peak times.

In addition, as noted in DMURS:

Designers may have concerns regarding larger vehicles crossing the centre line of the intersecting street or road. Such manoeuvres are acceptable when turning into/or between Local or lightly trafficked Link streets as keeping vehicle speeds low is of higher priority. Where designers find it difficult to apply the radii referred to above, or to further reduce corner radii where pedestrian activity is high (such as within centres) designers may also:

- *Increase the carriageway width at junctions to provide additional manoeuvrability without signalling to drivers that the corner can be taken at greater speeds (see Figure 4.44).*
- *Apply setback vehicular stop lines at signalised junctions to allow turning vehicles to cross the centre line of the intersecting street without conflicting with oncoming movements (see Figure 4.45 and Section 4.4.2 of the National Cycle Manual (2011)).*
- *Designers should also consider the use of setback stop lines on Arterial and Links streets within centres to further reduce corner radii.*
- *Keeping corners clear of obstacles (or removing obstacles such as guardrails) to allow emergency vehicle overrun.*

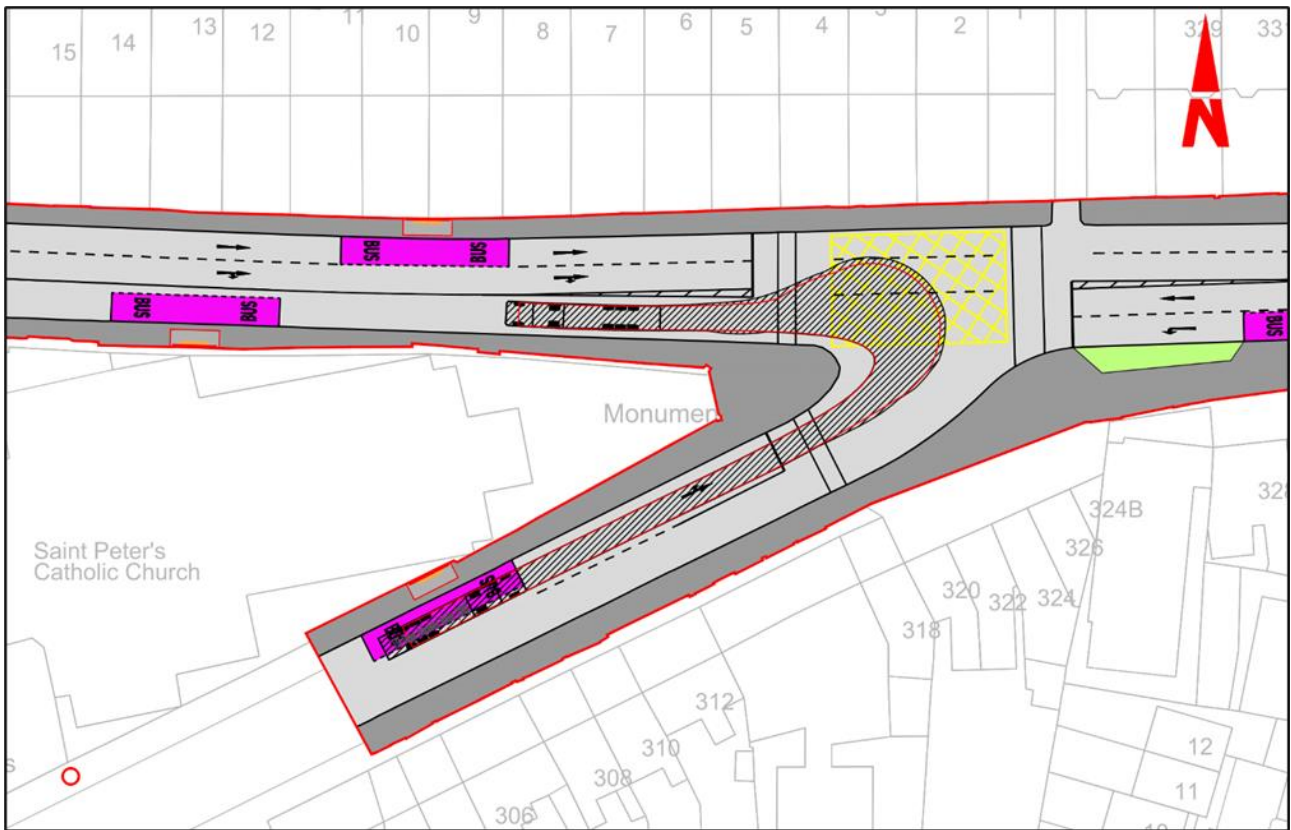


Figure 2.5.14: Swept path of HGV from North Circular Road travelling westbound towards Cabra Road

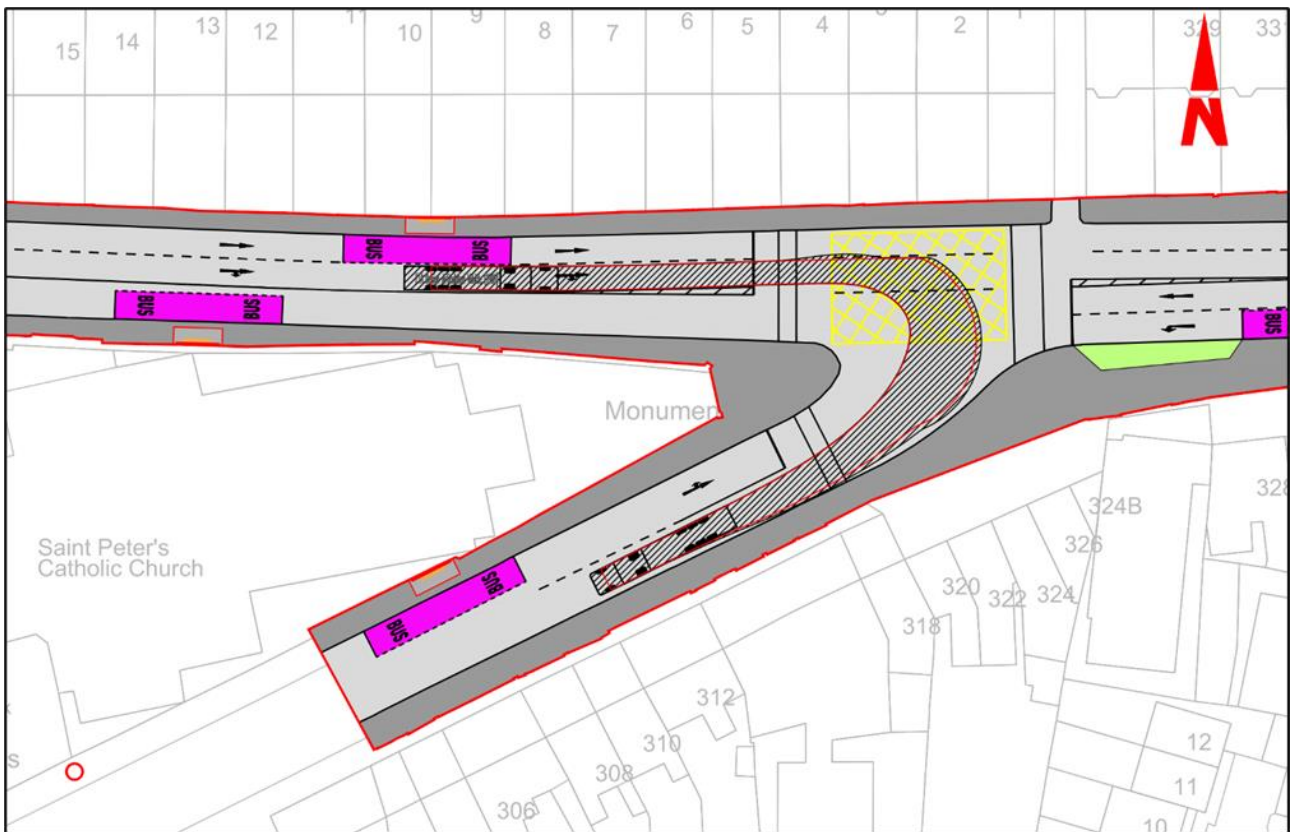


Figure 2.5.15: Swept path of HGV from Cabra Road travelling southwest bound onto North Circular Road

As noted in Appendix M2 Stage 1 Road Safety Audit of the Preliminary Design Report (dated May 2021):

The scheme has been examined and this report compiled in respect of the consideration of those matters that have an adverse effect on road safety and considers the perspective of all road users. It has not been examined or verified for compliance with any other standards or criteria.

The problems identified in this report are considered to require action in order to improve the safety of the scheme and minimise collision occurrence.

No problems were raised by the Road Safety Auditor in relation to the proposed layout of the junction.

2.5.3.11 Data Collection

Summary of issue

The submission expressed concern about the adequacy of data collection, and data used for modelling in the following areas:

1. Traffic and transport
2. Air quality
3. Noise and vibration
4. Road Safety Audits

Traffic and Transport

The submissions noted that this data feeds into all other sections of the EIAR. It noted that traffic surveys were conducted in November 2019 and February 2020, with survey data used as inputs to model calibration and validation. The submission stated that journey time data was taken from TomTom stats portal from 2019, which also fed into modelling.

A submission also noted that they did not observe any traffic observations being carried out.

The submissions noted that since baseline was completed, there has been a number of road closures and alterations, which include Grangegorman Lower and Capel Street, reduction of north Quays to a single lane and a segregated cycle lane from the canal to the Liffey along Constitution Hill. It is noted that this resulted in reduced road capacity, with longer journey times from Phibsborough to city centre.

The submission concluded that these major changes have not been taken into consideration in any baseline data, and so it cannot be considered sound to base modelling on inaccurate data.

The submissions noted the conclusions of chapter 6 of the EIAR which the submission noted is inaccurate and misleading and no mitigation measures have been considered for negative long-term effects on the surrounding road network.

Response to issue

The modelling process undertaken for the assessment of the Proposed Scheme is outlined in Section 6.2.3 of Chapter 6 in Volume 2 of the EIAR with further detail provided in Section 4.3 of Appendix A6.1 of Volume 4 of the EIAR.

Traffic surveys were used to develop the base models to ensure a robust representation of observed traffic flows in the model (Details on the survey locations and volumes included in Appendix A6.1, Section 5.2, in Volume 4 of the EIAR). The base model was then used as the starting point to produce future year forecasts of traffic flows with and without the Proposed Scheme in place.

Details on the TomTom query undertaken is outlined in Chapter 6 (Section 6.2.5.2.2) in Volume 2 of the EIAR. The query undertaken on the TomTom data was “*2019 weekdays (Monday to Thursday) from mid-January until end of November, excluding all bank holidays and days close to those dates*”.

This was done in order to ensure the data was representative of the busiest traffic periods and not skewed by quieter periods during weekends, Fridays or Bank Holidays when atypical traffic flows and patterns arise.

For assessment purposes, the modelling is not undertaken on the base year model but instead on forecast year scenarios representing the Opening Year (2028) and Design Year (2043). This is done to account for planned or implemented changes in the road network and also changes in demand as the population changes and new development takes place.

A Do-Minimum scenario is created to represent the likely-receiving environment for the assessment of the schemes (Section 6.4.3, Chapter 6 in Volume 2 of the EIAR) - *“The ‘Do Minimum’ scenario represents the likely traffic and transport conditions of the direct and indirect study areas without the Proposed Scheme in place. This scenario forms the reference case by which to compare the Proposed Scheme. The opening year for the Proposed Scheme is assumed to be 2028, with a design assessment year (opening + 15 years) assumed to be 2043....For the quantitative analysis (i.e. the transport modelling elements of the impact assessment), the Do Minimum scenario is based on the ‘likely’ conditions of the transport network and include for any known permanent improvements or changes to the road or public transport network that have taken place, been approved or are planned for implementation”*.

As outlined above any known “permanent” improvements or changes are added to the base model - *“As a result of the COVID-19 pandemic a number of temporary transport mobility measures have been implemented. Due to their temporary status, the measures are not considered a permanent long-term feature of the receiving environment and as such have not been considered in the impact assessment”*

In terms of the BusConnects modelling, the Do Minimum scenario does include recent permanent city centre changes implemented at the time of modelling including capacity reduction changes along the Quays and the closure of Grangegorman to through traffic.

Capel Street closure was not a permanent scheme at the time of modelling hence was not included in the Do Minimum scenarios. The measures on Capel Street are still subject to on-going consultation with the public.

Chapter 6 in Volume 2 of the EIAR concludes in terms of general traffic impacts - *“Overall, it has been determined that the impact of the reduction in general traffic flows along the Proposed Scheme will be Positive, Significant and Long-term whilst the impact of the redistributed general traffic along the surrounding road network will be Negative, Slight and Long-term.*

Thus, overall, there will be no significant deterioration in the general traffic environment in the study area as a consequence of meeting the scheme objectives of providing enhanced sustainable mode priority along the direct study area”.

The conclusion is based on the fact that vast majority of junctions within the indirect study area have similar V/C figures before and after scheme implementation as referenced in Appendix A6.4 Impact Assessments of Volume 4 of the EIAR.

As outlined in Chapter 6, Section 6.2.4.5 (“Determining the Significance of Effects”), in Volume 2 of the EIAR it states that “Potential mitigation and monitoring measures have been considered for assessments that result in a negative impact of significant or higher (i.e. significant, very significant or profound).”

On the whole the impacts on traffic in the indirect area is considered ***Slight*** and no further mitigation measures are deemed required.

As outlined in Chapter 6 Section 6.1.2, in Volume 2 of the EIAR, a significant iterative design process was undertaken with mitigation to traffic impacts embedded into the designs during their development:

Diagram 6.1 illustrates this process whereby the emerging design for the Proposed Scheme have been tested using the transport models as part the iteration. The transport models provided an understanding of the benefits and impacts of the proposals (mode share changes, traffic redistribution, bus performance etc.) with traffic flow information also informing other environmental disciplines (such as Air Quality, Noise and Vibration, Climate etc.) which in turn allowed feedback of potential impacts into the design process to allow for changes and in turn mitigation to be embedded in the designs. The design process included physical changes (e.g. cycle lane widening) and adjustments to traffic signals including changes to staging, phasing and green times to limit traffic displacement to the greatest extent possible as well as traffic management arrangements and/or turn bans where appropriate. This ensured that any displaced traffic was kept to a minimum and was maintained on higher capacity roads, whilst continuing to meet scheme objectives along the Proposed Scheme.

Air Quality

Summary of issue

The submission stated that Connaught Street has not been included in the description of the study area, despite the forecasted significant increase in traffic and noted that the desktop study used in the assessment is based on a report from 2019, which is 3 years out of date.

The submission noted that it is not clear from the EIAR chapter what the site-specific baseline monitoring study consisted of and its sampling locations. The submission argued that there was little or no monitoring locations beyond the proposed corridor, with only 10 locations along the entire 10km long corridor and undertaken in a 4-month period., with ‘lost’ results noted in the table of results.

The submission challenged the results of the study (“significance of the modelled change in the annual mean concentrations of these pollutants would be negligible”), given the increase in traffic on Connaught Street.

The submission argued that it is not appropriate to mitigate the negative impacts of the proposed scheme by relying on vehicle emission technology improving as quoted in section 8.2 of the Non-Technical summary of the EIAR, stating there is no guarantee vehicle owners will switch to electric vehicles.

Response to issue

Receptors on Connaught Street have been included in the dispersion model and the impact of the road traffic emissions on residential receptors on Connaught Street has been assessed.

The desktop study considered the data available at the time of assessment and writing the EIAR chapter. Further to this, data available since 2019 (i.e. 2020 and 2021) was heavily influenced by reduced traffic during COVID lockdowns and emerging from lockdowns, and is therefore not considered representative of long term trends in baseline air quality.

The site-specific monitoring methodology is described in Section 7.2.3.2 of Chapter 7 in Volume 2 of the EIAR, and the locations and data from these is given in Section 7.3.2.2 (Tables 7.17 and 7.18) of Chapter 7 and Figure 7.1 in Volume 3 of the EIAR. Due to survey preparation, length of survey and analysis time, the baseline monitoring location selection and monitoring itself are carried out well in advance of a completed final traffic model, which may indicate at a later stage in the assessment where impacts further from the scheme could occur.

This is typical methodology for both air quality and traffic assessment. Monitoring locations were selected based on their proximity to the scheme, explained in Section 7.3.2.2 of Chapter 7 – “*The baseline monitoring study was carried out close to the alignment of the Proposed Scheme, with monitoring focusing on areas of greatest potential impact.*” As Connaught Street is not on the scheme itself, it was not chosen as a monitoring location. However, impacts have been modelled there using predictive traffic data.

Additionally, while air quality monitoring surveys give valuable information on the baseline air quality, their main function is to provide data with which to validate the air quality dispersion model against the modelled traffic data, as described in Section 7.2.4.1.3 of Chapter 7. This verification exercise ensures the air quality dispersion model is as accurate as possible for the whole modelled study area.

The duration of the survey period is adequate for this purpose. One month monitoring is the minimum recommended by the Transport Infrastructure Ireland Air Quality Guidelines (2011), but 3 months is preferred, to allow for missing samples (usually through weather disturbance or public interference). However the impact of COVID has been noted in section 7.3.2.2 on preventing further data collection representative of baseline air quality. In general, four months of typical (i.e. prior to COVID-19 conditions) baseline data was collected which achieves the minimum monitoring period recommended in the TII Air Quality Guidelines.

The ambient air quality standard for nitrogen dioxide (NO₂) according to the Air Quality Regulations (S.I. 180 of 2011) is an annual mean of 40 µg/m³. Included in the air dispersion model is an increase in annual average daily traffic (AADT – annual average traffic flows are required to model annual mean NO₂ concentrations) flow of 6,069 due to the indirect impact of the scheme on Connaught Street.

As a result, the air dispersion model predicts nitrogen dioxide concentrations (including ambient background) of 23.1 $\mu\text{g}/\text{m}^3$ for the existing baseline, a Do Minimum (without the scheme) NO_2 concentration of 23.5 $\mu\text{g}/\text{m}^3$ and a Do Something (with scheme) NO_2 concentration of 25.3 $\mu\text{g}/\text{m}^3$ on Connaught Street. This means an increase in NO_2 concentration of 1.8 $\mu\text{g}/\text{m}^3$, or 4.5% of the annual mean air quality standard due to the scheme. The Transport Infrastructure Ireland Air Quality Guidelines (2011) indicate an increase of less than 4 $\mu\text{g}/\text{m}^3$ is considered “negligible”, where the existing concentration is less than 30 $\mu\text{g}/\text{m}^3$.

The switch from fossil fuelled cars to electric cars is inevitable – it is the proportions and timeframe that are uncertain. The uncertainty of electric vehicle proportions has been considered in the air quality dispersion model – Table 7.5 in Chapter 7 shows the proportions of vehicles (which influences the emissions modelled) for the Do Minimum and Do Something scenarios, notably that a low and constant proportion of 2% electric vehicles was assumed for both scenarios. The air quality dispersion model is therefore conservative and does not rely on a high proportion of electric vehicles to reduce future concentrations. This results in modelled NO_2 concentrations which are likely to be higher than actual future concentrations. The statement that a future cleaner fleet will aid in reducing local air quality NO_2 concentrations is not intended solely as a mitigation measure, but also an acknowledgement that BusConnects is a city-wide endeavour, and that the measures which affect the future baseline air quality of Dublin City (such as a cleaner fleet) are relevant to the scheme.

Noise and Vibration

Summary of issue

The submission stated that surveys were undertaken at 18 locations from July 2020 to September 2020 and pointed out this was undertaken during COVID restrictions and thus are not an accurate representation of true baseline noise levels. It noted that capacity on buses was restricted during this period with none of the baseline monitoring locations within the proposed development area.

The submission noted that the reported traffic noise level changes are based on inaccurate traffic modelling baseline data.

The submission found the text within section 8.4 of the Non-Technical Summary of the EIAR as confusing, given that it is reported that the long-term impact is both positive and negative at the same time.

Response to issue

Baseline Noise Surveys

In addition to the measured baseline noise survey data, a review of published road traffic noise maps was undertaken to inform the description of the prevailing noise environment in the study area. Section 9.3.2.6 of Chapter 9 of Volume 2 of the EIAR discusses the differences between the baseline noise levels measured during covid travel restrictions compared to normal conditions.

The differences in the measured baseline levels were determined to be in the range of 1 to 2 dB lower than normal conditions which are noted to be not significant and remain comparable against a range of published data from road traffic noise maps.

Section 9.3.2.6 in Chapter 9 of the EIAR sets out in detail the use of the baseline noise data for the noise impact assessment and confirms that *whilst there is potential for a small variation in baseline noise levels compared to normal conditions with no movement restrictions, this variation does not affect the impact assessment.*

Baseline Vibration Surveys

The baseline vibration surveys capture specific vibration levels associated with bus drive-bys and those along trafficked roads with multiple vehicle types. The data from the controlled sampling location at Harristown Bus Depot (Section 9.3.3.1 in Chapter 9) measured the event specific vibration associated with a bus driving past the measurement location in terms of peak particle velocity (PPV) and Vibration Dose Value (VDV) i.e. the peak of each drive-by is captured and reported in the EIAR (Table 9.26 in Chapter 9) and hence the volume of buses does not influence the measured data. For vibration data measured along the Malahide Road (Section 9.3.3.2 in Chapter 9), the results presented in Table 9.27 display the PPV and VDV range associated with bus drive-bys and with multiple vehicle types driving past.

The values measured at all locations result in negligible vibration levels at the edge of the road both in terms of human perception and building response as discussed in Chapter 9.

The highest vibration associated with a bus drive-by measured during the surveys has been used to calculate a Vibration Dose Value (VDV_{day}) for a full daytime period using the highest number of buses forecast along the Proposed Scheme during this period. This assessment is detailed in section 9.4.4.2 and confirms the calculated Vibration Dose Value is *orders of magnitude below those associated with a low probability of adverse comment. The overall impact is neutral and long term.*

Traffic Noise is based on Traffic Modelling, which is based on faulty and inaccurate baseline data

The impact assessment associated with the operational phase is based upon the traffic model outputs for both the year of opening and the design year. As discussed in the response to the traffic modelling exercise above, the output of the traffic model is a robust representation of the forecast traffic scenarios based on the Do Minimum assumptions discussed in the EIAR. It is therefore confirmed that the noise impact assessment is based on valid input data.

Non-Technical Summary of Noise Impacts

The study area for the Proposed Scheme considers the core bus corridor study area in addition to the surrounding road network. Due to the nature of the Proposed Scheme, there will be both decreases and increases in traffic volumes along the affected road network which result in associated decreases and increases in traffic noise levels. The Non-Technical Summary (NTS) notes that there are both negative and positive direct noise impacts along the proposed scheme (i.e. the core bus corridor) due to changes in traffic volumes. The NTS also notes there are indirect positive and negative noise impacts along the surrounding road network, similarly due to changes in traffic volumes. On balance, the overall magnitude of the change is categorised as slight, both positive and negative. The specific details of changes in traffic noise levels along the affected roads are included in Chapter 9 in Volume 2 of the EIAR and its associated figures (Volume 3) and appendices (Volume 4).

Road Safety Audit

Summary of issue

The submission noted that Appendix M1 Emerging Preferred Route Road Safety Audit was submitted for the Blanchardstown to UCD Bus Corridor and not the Blanchardstown to City Centre Core Bus Corridor, noting it was completed in 2018, four years prior to the planning application being submitted and did not contain the design that has been submitted as part of the recent planning application.

The submission stated that the assessment on the effects of the proposals on traffic and parking as recommended by the Auditor were not evident within the Road Safety Audit report.

In addition, the submission questioned the completeness of the document when certain items in the checklist on page 30 of the report were not included.

The submission noted that a number of items noted in the checklist for Appendix M2 – Stage 1 Road Safety Audit were not included and noted that several drawings still have a number of unresolved problems.

Response to issue

As noted in section 4.4 Design Principles of Chapter 4 of the EIAR, *the design of the Proposed Scheme was developed with reference to the Preliminary Design Guidance Booklet for BusConnects Core Bus Corridors (PDGB) (NTA 2021) – refer to Appendix A4.1 in Volume 4 of this EIAR.*

As noted in section 1.7 of the Preliminary Design Report:

The Preliminary Design Report sets out the preliminary design of the Proposed Scheme, and supports the Compulsory Purchase Order (CPO) documentation and Environmental Impact Assessment Report (EIAR) which form part of the Planning Application to An Bord Pleanála.

Section 4.18 Road Safety and Road User Audit states the following:

The TII Publication 'GE-STY-01024 Road Safety Audit' document provides an outline of the typical stages for road safety audits and are noted below as follows:

- *Stage F: Route selection, prior to route choice;*
- *Stage 1: Completion of preliminary design prior to land acquisition procedures;*
- *Stage 2: Completion of detailed design, prior to tender of construction contract. In the case of Design and Build contracts, a Stage 2 audit shall be completed prior to construction taking place;*
- *Stage 1 & 2: Completion of detailed design, prior to tender of construction contract, for small schemes where only one design stage audit is appropriate;*
- *Stage 3: Completion of construction (prior to opening of the scheme, or part of the scheme to traffic wherever possible); and*
- *Stage 4: Early operation at 2 to 4 months' post road opening with live traffic.*

Part 2 of a Stage F Road Safety Audit (RSA) was carried out at EPR (Emerging Preferred Route) stage (i.e. once the option had been chosen). A Stage 1 RSA, including a supplementary road safety audit, has been undertaken on the preliminary design, and designer's responses and appropriate changes made.

Both RSA's considered matters that have an adverse effect on road safety and considered the perspective of all road users.

As noted in section 2 of the EPR Road Safety Audit:

The proposed works consist of the provision of bus priority measures and cycle facilities along two routes. The first route extends from the Blanchardstown Shopping Centre to Ellis Quay, and includes measures on: -

- *The roads bounding the Blanchardstown Shopping Centre to the north-west and north-east;*
- *The L3020 from the Blanchardstown Shopping Centre to the Snugborough Road;*
- *Snugborough Road Grade Separated Junction Overbridge;*
- *N3 Navan Road between the Snugborough Road Grade Separated Junction and the Old & New Cabra Road Junction;*
- *Old Cabra Road;*
- *Prussia Street, Manor Street, Stoneybatter, Brunswick Street, George's Lane, Queen Street, North King Street, Blackhall Place and Blackhall Street*

The recommended measures relating to assessment of the effects of the proposals on traffic and parking on the adjacent road network was accepted by the Designer. The outcome of that assessment is not required to be included within the Road Safety Audit report.

Chapter 6 Traffic & Transport of Volume 2 of the EIAR has considered the potential traffic and transport impacts associated with the construction and operational phases of the Blanchardstown to City Centre Scheme.

All recommended measures or alternative measures proposed by the Designer have been accepted by the Road Safety Audit Team for the Emerging Preferred Route – Road Safety Audit.

In addition, with respect to Appendix M2 Stage 1 Road Safety Audit, all recommended measures or alternative measures proposed by the Designer were accepted by the Road Safety Audit Team.

2.5.3.12 Site Notice on Charleville Road

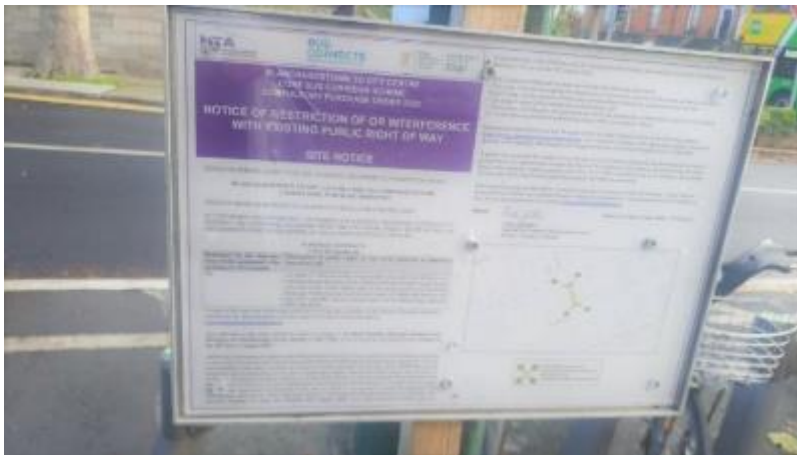
Summary of issue

Submissions stated that a site notice was not erected at Charleville Road.

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 51 locations along the route of the Proposed Scheme, supplementing the statutory notices for the CPO.

An A3 sized site notice was erected at Charleville Road on the 30th June 2022 on the lighting column adjacent to the Dublin Bike stands as shown on Photograph 2.5.1. The notice itself is shown in Figure 2.5.16.



Photograph 2.5.1: Image of erected Site Notice at Charleville Road



Figure 2.5.16: Site Notice for Charleville Road

2.6 Proposed Scheme at Mill Road

2.6.1 Description of Proposed Scheme at this location

Section 4.5.2.1 of Chapter 4 of Volume 2 of the EIAR states:

This Section of the Proposed Scheme will commence at the tie-in with the Snugborough Junction Upgrade scheme on the N3 citybound slip-road. A bus lane will be provided along the N3 Snugborough Road junction on slip and off-slip ramps. The Proposed Scheme will provide bus lanes on the N3 corridor in both directions which will require the widening of the BR01 River Tolka Bridge beneath the N3 off-slip and also BR02 Mill Road Bridge.

Additional inbound and outbound bus stops will be provided on the N3 with pedestrian access to and from Mill Road. Access from Mill Road to the new bus stops will be via pedestrian ramps and steps. Retaining walls will be constructed to support the pedestrian ramps and steps.

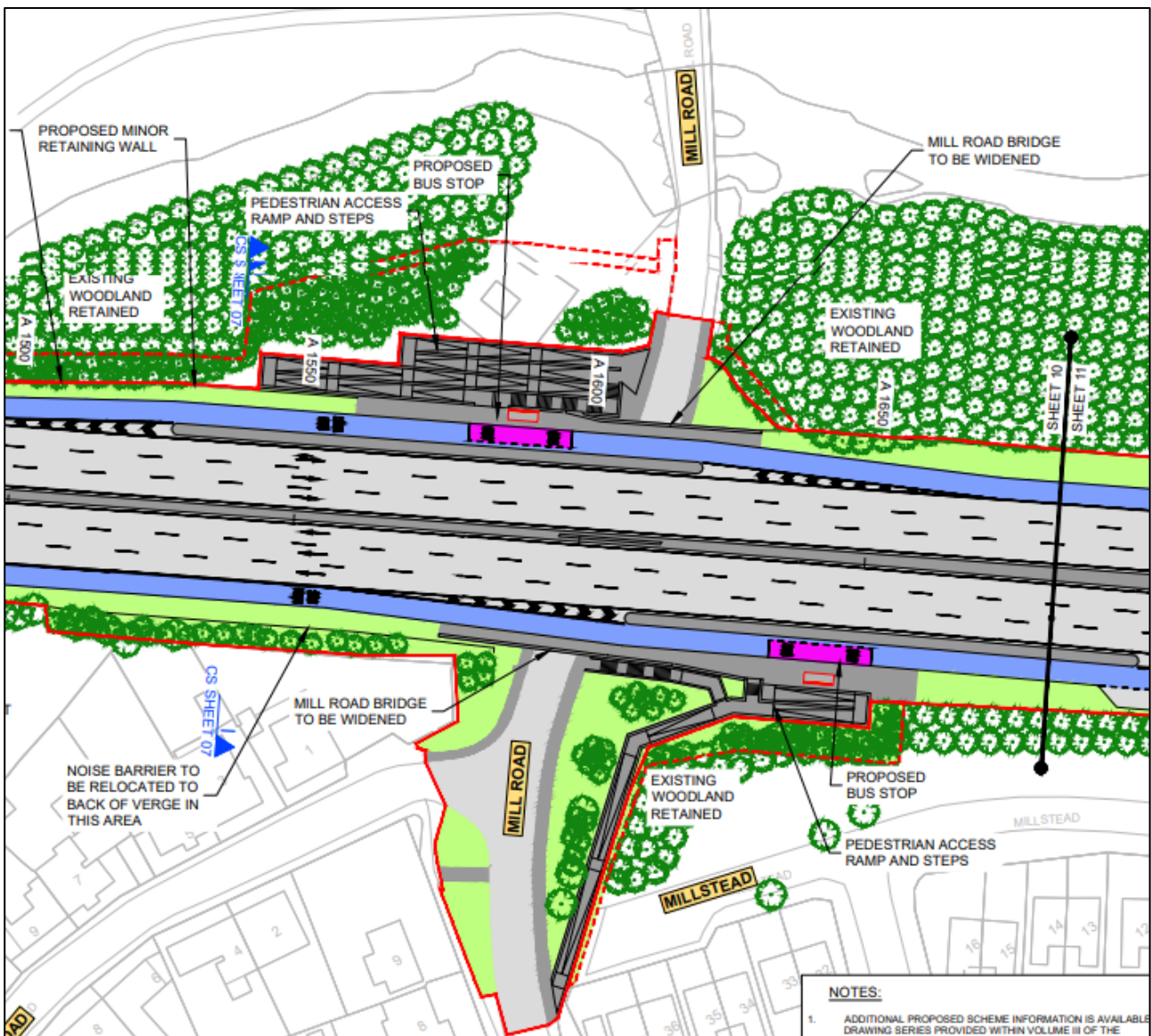


Figure 2.6.1: Extract from General Arrangement Drawing at Mill Road

2.6.2 Overview of Submissions Received

As shown in Table 2.6.1 below, 4 submissions were made in relation to the Proposed Scheme at this location.

Table 2.6.1: Submissions made in respect of Mill Road

No.	Name	No.	Name
56	Kevin Lawler	90	Roderic O’Gorman TD
66	Linda Marshall	119	Councillor John Walsh

The key issue raised by the submissions relating to the Proposed Scheme at this location are as follows:

- Pedestrian ramp boundary wall

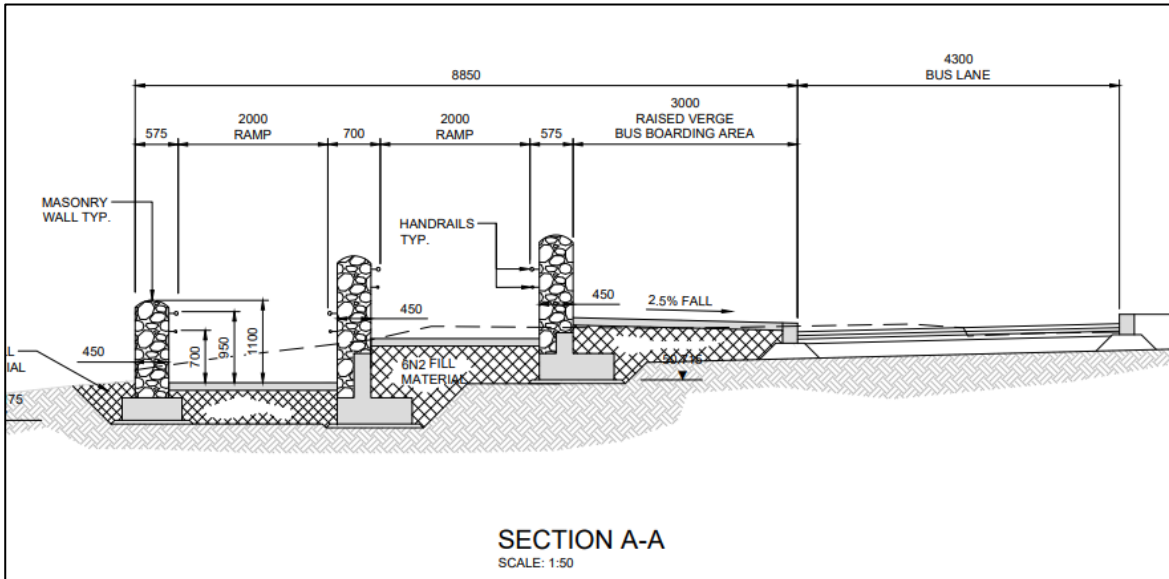


Figure 2.6.3: Extract from RW07-A stairs and access ramp (Bridges and Major Retaining Structures drawings from Volume 3 of the EIAR)

As noted in section 17.5.2.1 Review of Photomontages of Chapter 17 Landscape and Visual of Volume 2 of the EIAR, *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 proposed views are shown with proposed planting at approximately 10 – 15 years post completion of the Construction Phase. This below text describes the Proposed Scheme changes as illustrated in the photomontage. The Photomontages are as included in Figure 17.2 in Volume 3 of the EIAR.*



Figure 2.6.4: View from Millstead – Existing Situation

Figure 2.6.4 shows the existing view taken from Millstead looking northeast across the road. The view looks out over a small area of grassed open space on the far side of the road, towards a belt of mature trees, which separate the area from the N3 and provide a backdrop to the view. The character is of a residential street with substantial mature trees enclosing the view.

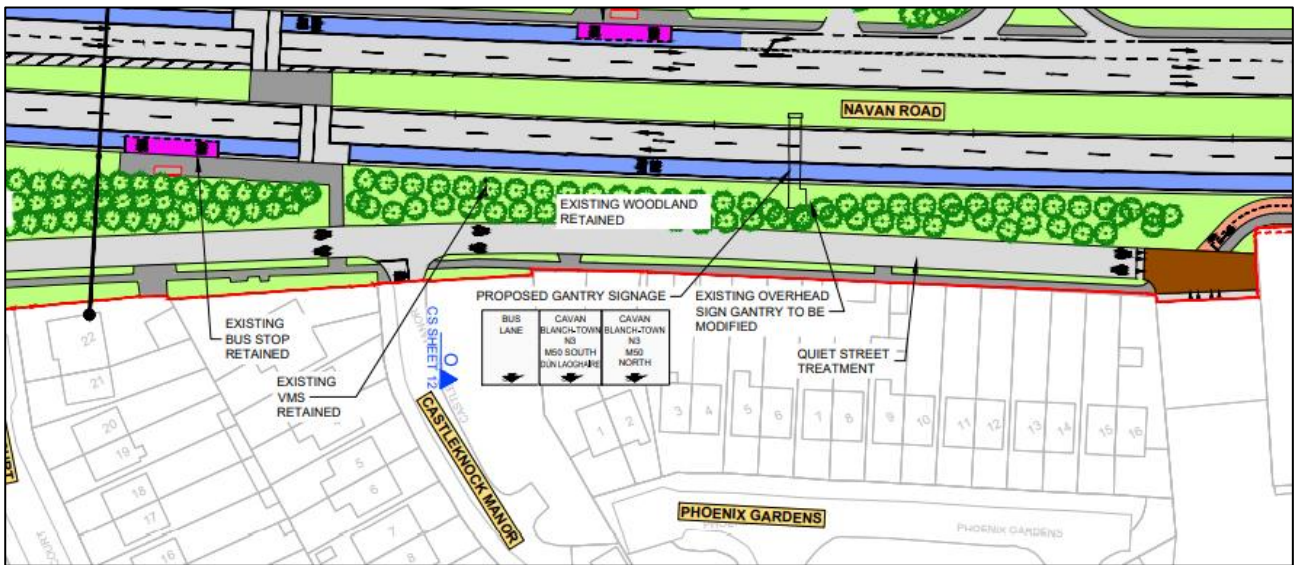


Figure 2.7.2: Extract 2 from General Arrangement Drawings at Castleknock Manor

2.7.2 Overview of Submissions

As shown in Table 2.7.1 below, 3 submissions were made in relation to the Proposed Scheme at this location.

Table 2.7.1: Submissions made in respect of Castleknock Manor

No.	Name	No.	Name	No.	Name
19	Councillor Pamela Conroy	90	Roderic O’Gorman TD	119	Councillor John Walsh

2.7.3 Common Issues Raised

2.7.3.1 Castleknock Manor

Summary of issue

Submissions stated that it is unclear what measures will be taken to ensure Castleknock Manor is a ‘Quiet Street’, and no conflict will exist between vehicles and cyclists.

A submission stated that Castleknock Manor street environment does not align with what is required by DMURS and the NCM for a Quiet Street, noting the street is wide, straight and includes large corner radii.

A submission stated that the design requires further consideration to ensure a slow speed environment.

Submissions noted that the Proposed Scheme has been altered at this location from the previous Proposed Scheme. Submissions welcomed the change to the location of the cycle lane (previously located on the Navan Road) to prevent the removal of trees between Castleknock Manor and Navan Road which was previously proposed. However, the submission stated that the drawings do not show a cycle lane. It stated that the road is relatively busy due to access to St Brigid’s GAA club. In addition, the submission stated that St Edmund Rice College is due to open this year and the submission suggested that students will use this stretch of road. The submission recommended that quiet street treatment be implemented to slow down cars and increase cyclist and pedestrian safety.

A submission welcomed the ‘Quiet Street’ on Castleknock Manor and requested a condition on any planning permission that the tree line is fully protected between Navan Road and Castleknock Manor. The submission also requested the proposed upgrade to the Auburn Avenue / Castleknock Manor roundabout be amended to preserve Auburn Green and removal of any trees.

Response to issue

As noted in section 4.12.3 of the Preliminary Design Report:

Offline options may include directing cyclists along streets with minimal general traffic other than car users who live on the street. They are called Quiet Streets due to the low volume of general traffic and are deemed suitable for cyclists sharing the roadway with the general traffic without the need to construct segregated cycle tracks or painted cycle lanes. The Quiet Street Treatment would involve appropriate advisory signage for both the general road users and cyclists. A quiet street cycle route is proposed along Castleknock Manor which connects to the two-way cycle track on the R147 Navan Road. This links directly with the GDA Cycle Network Plan Secondary Route 4A.

Castleknock Manor leads to a residential area and is a cul-de-sac, thus will not be subject to through-traffic. It is also noted that an existing footpath is separated from the carriageway by a grass verge.

As noted in Figure 2.7.3 below, there will be localised impact on the tree line between the Navan Road and Castleknock Manor to facilitate a new bus stop, with the existing woodland retained elsewhere. Additional woodland planting will be undertaken to restore the perimeter of the woodland in the vicinity of the proposed bus stop.

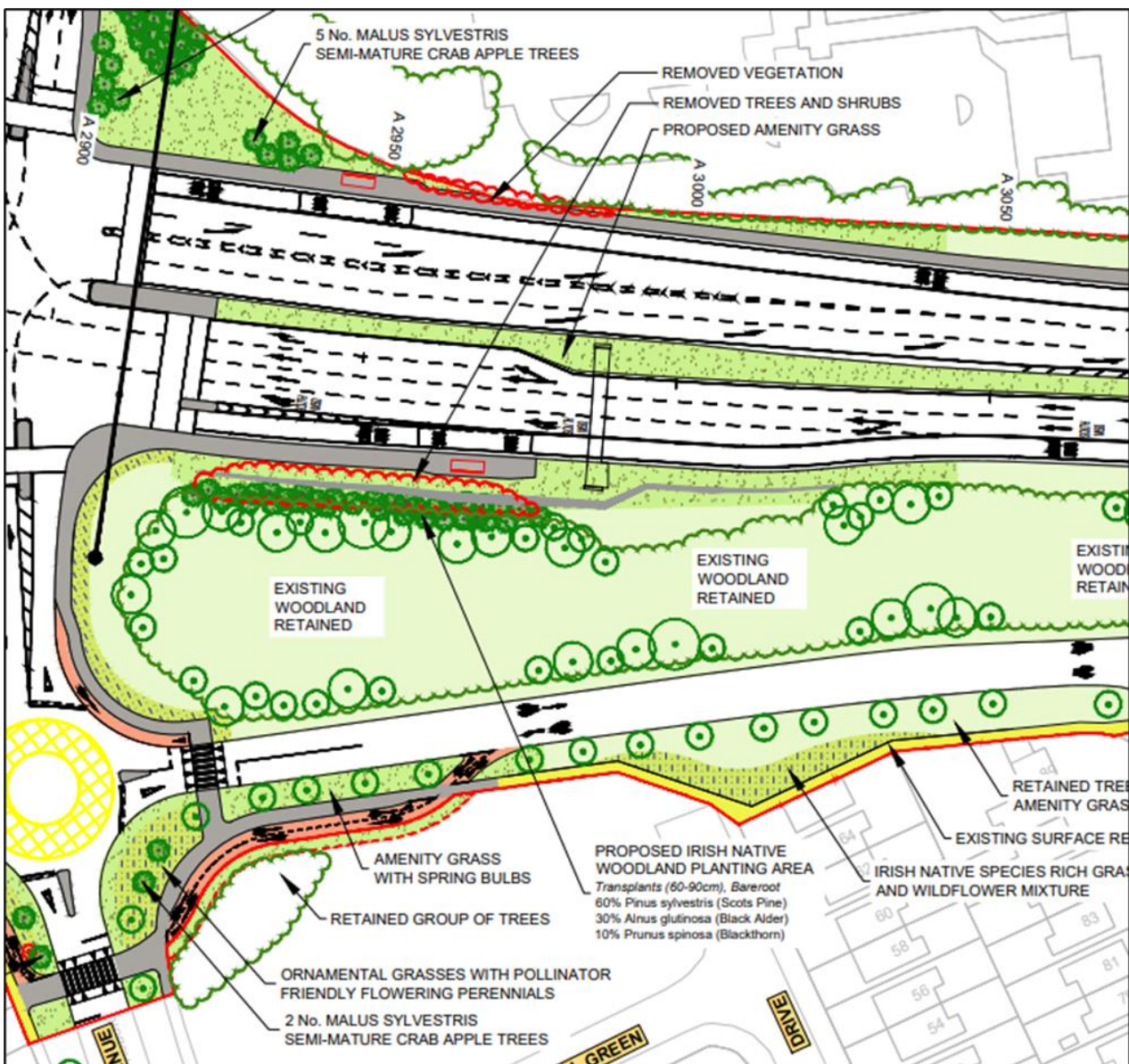


Figure 2.7.3: Western end of Castleknock Manor as extracted from Landscaping General Arrangement Drawing (Volume 3 of EIAR)

As shown in Figure 2.7.3, there will be no impact on existing trees in Auburn Green and two additional trees are proposed at this location. A total of 176.8 m² is being permanently acquired to facilitate the Proposed Scheme.

It is noted in section 6.4.6.1.3.1 (table 6.30) of Chapter 6 of Volume 2 of the EIAR that the upgrade of the Auburn Avenue / Auburn Park roundabout will result in a “positive significant” impact for the pedestrian level of service in the “Do something” scenario.

As noted in the National Cycle Manual: *Cycle lanes should not be included in the circulating section of roundabouts.*

The proposed layout removes cyclists from the roundabout and will minimise impact on green space and trees.

2.8 Proposed Scheme at Castleknock Road / Blackhorse Avenue Junction

2.8.1 Description of Proposed Scheme at this location

The Blackhorse Avenue / Ashtown Gate Road junction, located to the south of the Ashtown Road junction, will be signalised to allow improved traffic management, and in particular to minimise use of side roads by through traffic.

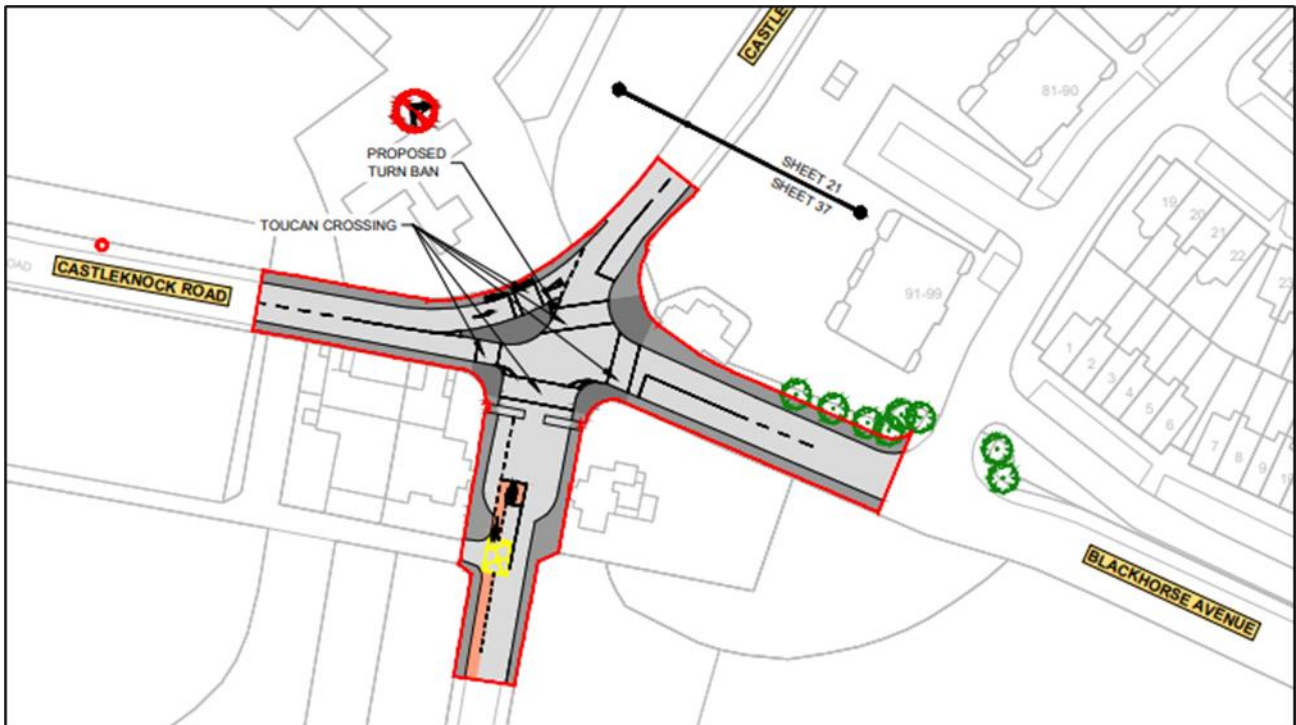


Figure 2.8.1: Extract from General Arrangement Drawing at Castleknock Road / Blackhorse Avenue Junction

2.8.2 Overview of Submissions

As shown in Table 2.8.1 below, 10 submissions were made in relation to the Proposed Scheme at this location.

Table 2.8.1: Submissions made in respect of Castleknock Road / Blackhorse Avenue junction

No.	Name	No.	Name	No.	Name
23	Jeff Dalton & others	79	Margaret Murray & others	93	Paul O’Leary & Brian O’Hanlon
24	Deerpark Area Residents Association	83	Navan Road Community Council	119	Councillor John Walsh
42	Michael Hannon	86	Kieran O’Brien		
68	Councillor Eimear McCormack	89	Miriam O’Dwyer		

2.8.3 Common Issues Raised

2.8.3.1 Castleknock Road/ Blackhorse Avenue junction

Summary of issue

A submission stated that this junction is particularly hazardous for pedestrians and Navan Road Community Council has been trying for at least 20 years to get the junction upgraded by the Local Authorities to make it safer.

A submission objected to the restriction of / interference with the existing Right of Way at Castleknock Road Blackhorse Avenue Junction and stated that options were not considered with respect to this junction which should include a transport assessment and acquiring lands from the old Phoenix Park racecourse. Another submission noted that buses proceed through at top of Blackhorse Avenue on an hourly basis.

Another submission also objected to the proposed changes at this junction as it currently provides direct access for the residents of Chesterfield, and the wider Castleknock area to Blackhorse Avenue, the Phoenix Park and the city centre. A submission also stated that options were not considered for this junction, which should include a transport assessment.

A submission welcomed the improvements for pedestrians and cyclists at this junction and noted it will enhance the safety of the access to Phoenix Park.

A submission stated that this junction is currently unsafe and will not facilitate a huge increase in traffic.

Submissions raised concerns about the “no right turn” from Castleknock Road into the Phoenix Park and onto Blackhorse Avenue (inbound), noting it would increase traffic along Navan Road. It suggested that this would be counterproductive to a proper traffic plan and would have a major negative impact on residents and commercial premises on Blackhorse Avenue.

It was suggested to put traffic calming raised tables on Blackhorse Avenue to reduce traffic and facilitate cyclists.

A submission stated it is unclear from the planning documents if Blackhorse Avenue is becoming one-way, as it would impact on travel times.

A submission recommended that a roundabout should be installed to make the junction safer, maintains access to all roads and avoids extra traffic travelling along Navan Road. The submission went on to state that the toucan crossings should be converted to pedestrian crossings at each arm to facilitate pedestrians.

A submission stated that this route is the main artery into town and adequate consultation has not taken place with the Office of Public Works (OPW).

A submission noted that driving restrictions are already in place in Phoenix Park and the creation of one-way traffic systems will cause local roads to become arteries.

Another submission noted that buses rarely encounter delays on Castleknock Road, and the current proposal would only provide modest improved access to the Core Bus Corridor on Navan Road while having a negative impact on residents.

Concerns were also raised over the perceived increase in traffic in the area.

Response to issue

As noted in Table 4.17 of Chapter 4 Proposed Scheme Description of Volume 2 of the EIAR, to minimise general traffic levels on local side streets, it is proposed to restrict vehicular traffic from turning from Castleknock Road onto Blackhorse Avenue and Ashtown Gate Road. Access to Blackhorse Avenue and Ashtown Gate Road will still be available via the surrounding road network.

Section 7.3.2 of Preferred Route Options Report of the Supplementary Information states:

From the traffic modelling results, it was apparent that general traffic may divert from Navan Road to Blackhorse Avenue.

To address these concerns, the junction of Blackhorse Avenue/Ashtown Gate Road will be signalised to allow improved traffic management such that signal green times from Blackhorse Avenue can be minimised to limit through movement on this route.

The proposed layout will include the provision of toucan crossings which will enhance safety for both pedestrians and cyclists.

Extensive engagement took place with the OPW during the development of the Proposed Scheme at this location.

Traffic management measures were introduced in Phoenix Park in February 2022 which at the time of the planning application were the subject of a 9-month pilot study. Consequently, they were not considered in the impact assessments.

Blackhorse Avenue

As noted in Table 6.64 of Chapter 6 Traffic Transport of the EIAR, at AM peak hour, two-way traffic is predicted to decrease as a result of the proposed scheme, resulting in a significant positive impact.

As noted in Table 6.69 of Chapter 6 Traffic Transport of the EIAR, at PM peak hour, two-way traffic is predicted to decrease as a result of the proposed scheme, resulting in a moderate positive impact.

As noted in Table 6.70 of Chapter 6 Traffic Transport of the EIAR, at PM peak hour, traffic is predicted to increase by 219 PCU's per hour on another section of Blackhorse Avenue. In light of these increases and in line with the thresholds detailed in section 6.4.6.2.8.2 Significance of the General Traffic Impact – Diagram 6.48, further assessment has been undertaken by way of a traffic capacity analysis on the associated junctions along the affected links (see section 6.4.6.2.8.7 General Traffic Impact Assessment of Chapter 6). As noted in Table 22 and Table 23 in Appendix A6.4 Impact Assessments, the Significance of Effect at the various Blackhorse Avenue junctions, as a result of the Proposed Scheme, has been determined as “Not Significant” in relation to the Transport Impact Assessment.

It is noted that access will still be available to Blackhorse Avenue via the surrounding road network and access for pedestrians and cyclists is being maintained. Given the limited nature of the proposed changes, it is not anticipated that there will be a material effect on a community basis, or the commercial viability of businesses on Blackhorse Avenue.

Castleknock Road

As noted in Figure 6.7 of Volume 3 of the EIAR, there is a forecasted reduction in traffic flow each side of the Castleknock Road / Blackhorse Avenue junction at AM peak hour (2028) as a result of the Proposed Scheme. As noted in Figure 6.8 of Volume 3 of the EIAR, there is a forecasted reduction in traffic flow between the Castleknock Road / Blackhorse Avenue junction and the Ashtown Road junction, at PM peak hour (2028). In addition, at PM peak hour, the change in traffic flows on the western approach to the Castleknock Road / Blackhorse Avenue junction, as a result of the Proposed Scheme, is forecasted to be less than 100 PCUs (i.e. approximately 1 vehicle per minute per direction), which is a very low level of change.

Further information on the traffic impact on the surrounding road network, including Navan Road is detailed in sections 2.2.3.5 and 2.3.3.1 of this report.

2.9 Whole Scheme

2.9.1 Overview of Submission

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

- 025 Development Applications Unit
- 029 Dublin City Council
- 030 Dublin Commuter Coalition
- 031 Dublin Cycling Campaign
- 033 Fingal County Council
- 081 National Asset Management Agency
- 112 Transport Infrastructure Ireland
- 124 Inland Fisheries Ireland
- 125 Brendan Heneghan

2.9.2 Development Applications Unit

2.9.2.1 *Archaeology*

Summary of issue

The submission noted that the EIAR included a desk based Archaeological Impact Assessment, and they noted they are broadly in agreement with findings of the Archaeology and Cultural Heritage.

The Department stated the following conditions should be attached to planning consent:

1. All mitigation measures in relation to Archaeology and Cultural Heritage as set out in Chapter 15 of the EIAR shall be implemented in full, except as may otherwise be required in order to comply with the conditions of the Order.
2. The CEMP shall clearly identify and highlight the location of all archaeological and cultural heritage constraints located in proximity to the proposed works, as identified in Chapter 15 of the EIAR or any subsequent archaeological investigations. The submission went on to state that the CEMP shall clearly describe all identified archaeological impacts, both direct and indirect, and all mitigation measures to be employed to protect the archaeological or cultural heritage environment during site preparation and construction works.
3. A Project Archaeologist shall be appointed to oversee and advise on all aspects of the scheme from design to completion.
4. The Planning Authority and the Department shall be furnished with a final archaeological report describing the results of the archaeological monitoring and any archaeological investigative work required, following the completion of all archaeological work and any necessary post-excavation specialist analysis. The Department also stated that all resulting and associated archaeological costs be borne by the NTA.

The reason is to ensure the continued preservation (either in-situ or by record) of places, caves, sites, features or other objects of archaeological interest.

Response to issue

As part of the EIAR, a CEMP has been prepared for the Proposed Scheme and is included as Appendix A5.1 in Volume 4 of the EIAR. The CEMP will be updated by the NTA prior to finalising the Construction Contract documents for tender, so as to include any additional measures required pursuant to conditions attached to An Bord Pleanála's decision. The CEMP comprises the construction mitigation measures, which are set out in the EIAR and NIS.

All of the measures set out in this CEMP will be implemented in full by the appointed contractor and its finalisation will not affect the robustness and adequacy of the information presented and relied upon in the EIAR and NIS.

Table 5.2 of the CEMP (refer to entries relating to Chapters 15 and 16 within the table) list out the locations of all archaeological and cultural heritage constraints which require monitoring, along with proposed actions associated with each location.

The NTA note the proposed condition to appoint a Project Archaeologist and confirm that 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 for archaeological monitoring to be carried out under licence to the DHLGH and the NMI, and will ensure the full recognition of, and the proper excavation and recording of, all archaeological soils, features, finds and deposits which may be disturbed below the ground surface. All archaeological issues will have to be resolved to the satisfaction of the DHLGH and the NMI.

Mitigation related to archaeological management is outlined in Chapter 15 of the EIAR (section 15.5.1.1.1) and also summarised in Chapter 22 of the EIAR and Table 5.2 of the CEMP. The issue of funding with respect to archaeological excavation is acknowledged by the NTA:

As part of the licensing requirement and in accordance with the funding letter, adequate funds to cover excavation, post-excavation analysis, and any testing or conservation work required will be made available.

2.9.2.2 Nature Conservation

Summary of issue

Clearance of hedgerows and trees

The submission referred to the proposal to remove 1.46 ha of hedgerows and 0.67 ha of treeline. The submission stated that while incorporating trees and shrubs in the landscaping should ensure there will be no long-term loss of biodiversity as a result of vegetation clearance, the felling of trees and removal of hedges during the bird breeding season could lead to the destruction of nests, eggs and nestlings, and should be avoided.

The Department recommended the following condition should be attached to planning consent:

- That no removal of trees or vegetation shall occur during the main breeding season from March to August inclusive.

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

Surface Water Pollution

The submission also noted that the EIAR identifies the possibility that pollutants mobilised into surface water runoff from the Proposed Scheme, including construction compounds, during construction could have adverse effects on aquatic biota occurring in water bodies such as the River Tolka and the Royal Canal, a proposed Natural Heritage area (pNHA). The submission noted that mitigation measures are set out in the Surface Water Management Plan (SWMP) and in the CEMP, supporting this application to prevent such pollutants being mobilised from the scheme and reaching water bodies.

The submission went on to state that measures include the employment of silt curtains, berms and infiltration trenches, the storage of hydrocarbons and other chemicals and refuelling of machinery in bunded areas and safe handling of cementitious materials, which should prevent the pollution of surface water bodies and adverse effects on aquatic flora and fauna.

The Department recommended the following condition should be attached to planning consent:

- That all the mitigation measures to avoid the pollution of surface water runoff from the proposed scheme, including construction compounds during the construction phase of the Proposed Scheme set out in the SWMP submitted in support of the application shall be implemented in full.

Reason: to avoid the pollution of surface water bodies including rivers and the Royal Canal in the vicinity of the Proposed Scheme resulting in adverse effects on aquatic flora and fauna.

Response to issue

The NTA welcomes the engagement of the Department in relation to these important matters of nature conservation.

The NTA has extensively considered the potential of the Proposed Scheme to impact on adjacent sensitive receptors, and has outlined a number of mitigation measures which addresses these risks in the EIAR, the NIS and other supporting documentation.

Clearance of hedgerows and trees

As set out in the Chapter 12 (Biodiversity) of Volume 2 of the EIAR, the effects of disturbance and displacement of birds during the breeding season within areas of construction is likely to be temporary in nature. Chapter 12 Section 12.4.3.5.1.3 states that “*there is an existing relatively high level of human disturbance within the immediate environment of the Proposed Scheme (e.g. N3 Dual Carriageway and inner city areas such as Stoneybatter) and as such it is likely that breeding species present are habituated to a certain degree of disturbance. The magnitude of the impact will be dependent on the type of construction works and their duration; general construction activities will have a less pronounced affect than blasting, in terms of its ZoI, but will be on-going from periods of up to 24 months and multiple breeding seasons across the entirety of the Construction Phase. However, the likely phasing of the construction works in scheme sections will mean that this impact will be temporary in nature.*”

Trees and vegetation identified for removal will be removed in accordance with BS 3998:2010 Recommendations for Tree Work – refer to Chapter 17 (Section 17.5.1) of the EIAR for further information relating to mitigation for trees and vegetation to be retained/removed. As set out in section 12.5.1.5.1.2 of Chapter 12 of the EIAR:

Where practicable, vegetation (e.g., hedgerows, trees, scrub, bankside vegetation and grassland) will not be removed, between the 01 March and the 31 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 three 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 NPWS.

Surface Water Pollution

The proposed scheme has laid out a detailed plan to prevent damage to the environment from water pollution. Chapter 13 Water of Volume 2 of the EIAR includes Table 13.18 which demonstrates the Scheme’s compliance with all aims to achieve Good Ecological Status (GES) or Good Ecological Potential (GEP) or cause a deterioration of the overall GES or GEP of any of the water bodies that are in scope.

As part of the EIAR, a CEMP has been prepared for the Proposed Scheme and is included as Appendix A5.1 in Volume 4 of the EIAR. The CEMP will be updated by the NTA prior to finalising the Construction Contract documents for tender, so as to include any additional measures required pursuant to conditions attached to An Bord Pleanála’s decision.

It will be a condition of the Employer's Requirements that the successful appointed contractor, immediately following appointment, must detail in the CEMP the manner in which it is intended to effectively implement all the applicable mitigation measures identified in this EIAR. The CEMP has regard to the guidance contained in the Guidelines for the Creation, Implementation and Maintenance of an Environmental Operating Plan (TII 2007), and the handbook published by CIRIA in the UK, Environmental Good Practice on Site Guide, 4th Edition (CIRIA 2015).

It is the intention of the NTA that liaison continues with the relevant bodies including the Department of Housing, Local Government and Heritage and the biodiversity department of FCC / DCC in advance of, and during, the subsequent construction stage of the Proposed Scheme. This engagement will continue to take their requirements into consideration, where aligned with and consistent with the EIAR.

2.9.3 Dublin City Council

Dublin City Council's (DCC) submission comprised of 50 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:

- Role of NTA & Liaison with DCC
- Support for the Scheme
- 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 2.4.10)
 - C5 – Response to Section 2.5 Conclusion
 - C6 – Response to Appendix to DCC Submission

Introduction

The Blanchardstown 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 Environmental Impact Assessment Report (EIAR) Chapter 1 Introduction, Section 1.4, Role of the National Transport Authority, of the Blanchardstown to City Centre Core Bus Corridor Scheme EIAR (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 confirmed its support for the Proposed Scheme, and stated in their conclusion on page 40 of the submission:

“The proposed Blanchardstown 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 confirmed (at page 40 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 acknowledged that these improvements will make it easier for people to access and use public transport. It also acknowledged 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 9 of its submission) that, in terms of Regional Policy, the Proposed Scheme is supported by the Regional Spatial and Economic Strategy (RSES).

In relation to the Dublin City Development Plan 2016-2022, the DCC submission (page 10) confirmed 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 18 of its submission, DCC noted that the forthcoming Dublin City Development Plan 2022-2028 supports key sustainable transport projects including BusConnects.

In relation to the EIAR, DCC stated (at page 15 of its submission) that: *“A comprehensive EIAR is provided with the application 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 that “the content [of the EIAR] points generally to the development having negligible impact on the existing environment”.*

In relation to the Natura Impact Statement (NIS), DCC stated (at page 16 of its submission) that the NIS 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: *“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.”*

In relation to zoning, the NTA notes that DCC set out the view on page 17 of its submission that the Proposed Scheme is compatible with the Z1, Z2, Z3, Z4, Z5, Z6, Z9 and Z15 zones along its route.

On page 17 of its submission, in relation to amenities, DCC stated: *“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 18): *“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 Environment and Transportation Department of DCC set out (at pages 18 and 19 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 stated 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 page 19 of its submission, DCC stated: *“The Traffic Section is supportive of the integrated sustainable transport proposals and recognises the significant improvements that they will bring in terms of safe cycling measures and in enabling an efficient public transportation service along these routes”.*

On page 20 of the DCC submission, the Roads Department stated: *“The Roads Department is generally supportive of the scheme and its intention to improve bus and cycling provision”.*

On page 37 of the DCC submission, the City Architects Department welcomed in principle the objectives of the Proposed Scheme to support integrated sustainable transport use through infrastructure improvements for active travel (both walking and cycling), and the provision of enhanced bus priority measures. It goes on to state that the Proposed Scheme will facilitate the modal shift from car dependency through the provision of walking, cycle, and bus infrastructure enhancements thereby contributing to an efficient, integrated transport system and facilitating a shift to a low carbon and climate resilient City. This Department also noted 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 in section B - DCC's support for the Scheme, DCC is supportive of the Proposed Scheme and its improvements to public transport and the shift to sustainable mobility, DCC has also 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 submission, listed three significant planning applications along, and adjacent to, the Proposed Scheme. The NTA notes that one of the planning applications listed is identified in the application documentation – namely EIAR Volume 4 Appendices Part 1 of 4, Appendix A2 .1 Planning Report, Sub Appendix 2 Table 2.1 as set out below:

- **Park Shopping Centre & Nos. 42-45 Prussia Street;** Permission granted for a strategic housing development comprising a mixed use district centre, student residential housing and Build-to-Rent (BTR) housing development in two buildings (ref. SHD0007/21).

The two other planning applications that DCC refer to are:

- **Nos. 23-28 Prussia Street;** Permission refused by An Bord Pleanála for a Strategic Housing development at 23-28 Prussia Street (ref. SHD0033/21).
- **Nos. 29b, 30 and 31 Prussia Street;** Permission granted by An Bord Pleanála for a Strategic Housing development at 29b, 30 and 31 Prussia Street (ref. SHD0025/21 ABP ref. 312102-21).

The NTA confirms its awareness of these two planning applications.

The NTA note the planning applications along and adjacent to the route identified by DCC. The majority of these are also listed in Section 1.1.1 of Appendix 2 of the Planning Report.

From a review of the planning application (SHD0025/21) listed in the DCC submission it is considered that the construction and operation of this in combination with the Proposed Scheme, will not generally give rise to significant residual cumulative impacts. Should construction of this development run concurrently or overlap with construction of the Proposed Scheme, there is potential for moderate temporary and localised construction phase visual impacts along this section of Prussia Street, which is also an Architectural Conservation Area (ACA).

In addition, a further review has been undertaken on a precautionary basis to identify other relevant strategic housing developments/significant infrastructure developments that may have been planned during and since the preparation of the EIAR. No significant residual cumulative impacts are considered likely from any schemes identified, in cumulation with the Blanchardstown to City Centre scheme.

It is also acknowledged in Section 5.9 of Chapter 5 of Volume 2 of the EIAR that interface liaison will be undertaken on a case-by-case basis with other projects if required to ensure that cumulative impacts are managed appropriately:

Interface liaison will take place on a case-by-case basis through the NTA, as will be set out in the Construction Contract, to ensure that there is coordination between projects, that construction access locations remain unobstructed by the Proposed Scheme works and that any additional construction traffic mitigation measures required to deal with cumulative impacts are managed appropriately.

With respect to the application at Nos. 23-28 Prussia Street, it is understood that this application has been refused by An Bord Pleanála, and as such is not envisaged that it will not have any significant cumulative impact in conjunction with the Proposed Scheme.

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 EIAR Volume 4 Appendices Part 1 of 4, A2.1 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 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.

DCC noted that the Draft Dublin City Development Plan 2022-2028 is scheduled to be adopted in December 2022, and that a significant number of policies have relevance to the delivery of transport infrastructure.

The NTA note that the Draft Dublin City Development Plan 2022-2028 was adopted in December 2022 and that the EIA had regard to the draft plan, noting the following from section 2.3.5.9 of Chapter 2 of Volume 2 of the EIAR:

The Dublin City Development Plan 2022-2028 is set to be adopted in 2022. Although the draft Dublin City Development Plan 2022-2028 is subject to change, it is clear that BusConnects is an important consideration, and its development is to be considered as part of the shaping of emerging policy for the city.

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:

The NTA notes that DCC state that a comprehensive EIAR is provided with the application documents under all relevant impacts.

2.4.3. Natura 2000

Response to Section 2.4.3:

In relation to the NIS, the NTA notes that DCC stated (at page 16 of its submission) that the Natura Impact Statement submitted is generally satisfactory in terms of identifying the relevant Natura 2000 sites and the potential adverse impacts on the integrity of designated Natura 2000 sites along the Dublin coastline in view of their conservation objectives. DCC went 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.”*

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 17 of its submission that the Proposed Scheme is compatible with the Z1, Z2, Z3, Z4, Z5, Z6, Z9 and Z15 zones along its route.

2.4.5. Impact on amenity

Response to Section 2.4.5:

On page 17 of its submission, in relation to amenities, DCC stated: *“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 went on to state (at page 18): *“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:

The DCC submission noted that the forthcoming Dublin City Development Plan 2022-2028 supports key sustainable transport projects including BusConnects. DCC further note that under a current Railway Order application, Irish Rail has proposed works close to the Ashtown Roundabout (sheet 21 of the General Arrangement Drawings). DCC go on to state that other proposed upgrade works at the Navan Road Parkway station as part of the same Railway Order application may be of relevance to the Proposed Scheme.

Chapter 21 of the EIAR, Cumulative Impacts, has considered the potential interaction of the Proposed Scheme and the DART+ Programme West, which is the railway order to which DCC refer. Within Chapter 21 this is referred to as Major Project (id MP08), and the cumulative impacts relating to both schemes have been assessed. The following is noted in Section 21.2.6 of the EIAR:

“It is envisaged that the Proposed Scheme construction works will be completed in advance of DART+ West works, particularly where major construction work and hence greater construction traffic volumes are required on the road network.”

2.4.7. Environment and Transportation Department Comments

2.4.7.1 General Comments

The Environment and Transportation Department of DCC set out (at pages 18 and 19 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 stated 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 went 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.

2.4.7.2 Traffic Department (including reference to the Appendix):

On page 19 of its submission, DCC stated:

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

DCC’s Traffic Department acknowledged 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 10% and 14% during the AM and PM Peak hours of the 2028 Opening and 2043 Design Year. On an annual basis this equates to 6,400 hours of bus vehicle savings in 2028 and 5,800 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 45 to 55) at the busiest section. As can be seen from Table 6.60 and Diagram 6.23 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 12.5.3 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 recognised that the *“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 comment from DCC’s Traffic Department that the design of this scheme is complex, in particular from the Navan Road junction to Blackhall Place, requiring complex traffic re-routing.

DCC further went on to state that due to this complexity, in order to achieve the required level of priority for buses and the provision of safe cycling facilities, that it is proposed to remove some existing parking and loading bays. The impact on parking and loading is detailed in Chapter 6 of the EIAR, Traffic and Transport. This impact has been categorised as Negative, Slight and Long-term in Section 4 of the Proposed Scheme, and Negative, Moderate and Long-Term in Section 5 of the Proposed Scheme.

This moderate effect is considered acceptable in the context of the planned outcome of the Proposed Scheme, which is to improve accessibility to this local area (on foot, by bicycle and bus) for residents and visitors to local shops and businesses.

The NTA also note the comments from DCC in relation to the use of Bus Gates along portions of the route to compensate for the lack of continuous bus lanes, as well as changes to the traffic flows in the vicinity of Aughrim Street, Prussia Street and the surrounding areas. DCC further noted that the enhanced data garnered by DCC from the next Generation AVL system, and the next generation Bus priority system currently being specified will play a key role in how the corridor is dynamically managed to ensure that the bus journey times and headways are met. The bus gates proposed as part of the Proposed Scheme balance the provision of bus priority and cycle infrastructure through sections where the available space is limited while minimising impacts on the surrounding environment, and limiting through traffic in tandem with facilitating local access for residents and businesses; and acknowledging the urban village function of Stoneybatter Village. This enables the objectives of the Proposed Scheme and the NTA welcomes DCCs comments in relation to the ever-improving dynamic traffic management systems.

The NTA welcome DCCs comments in relation to the good connectivity provided for walking and cycling via Queen Street, linking to Grangegorman campus and allowing for integrating with the cycle network in the city.

The NTA notes the additional comments from the Transport Division (Department) provided in the Appendix. The Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Transport 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. The 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.

2.4.7.3. Roads Department

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

The NTA welcomes the comment by DCC that the Roads Department is generally supportive of the scheme and its intention to provide bus and cycling provision.

With 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 2 of 4, Chapter 6 Traffic and Transport Appendices) Appendix 4 and summarised in Section 8 of Appendix A6.1 - Traffic Impact Assessment Report and Section 6.4.6.1.7 of Chapter 6 Traffic & Transport of Volume 2 of the EIAR. These interventions, which form part of the Proposed Scheme, further enhance the movement hierarchy emphasis in line with the Proposed Scheme Objectives.

The Proposed Scheme will increase the number of controlled pedestrian crossings from 77 in the Do Minimum to 125 in the Do Something scenario, equating to a 62% increase. Additionally, there will be an increase in the number of raised table crossings on side roads from 6 in the Do Minimum to 22 in the Do Something scenario, equating to a 266% increase. It is further noted that the Proposed Scheme proposes to increase footpath widths at critical locations with high pedestrian demand, such as on Manor Street/Stoneybatter, Blackhall Place and Queen Street.

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 4.14 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.

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 and the private car.

This challenge directly correlates to the Proposed Scheme objectives as set out in Section 1.2 of Chapter 1 in Volume 2 of the EIAR. 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 (Chapter 6, Traffic & Transport), which is centred 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 the Proposed Scheme including Stoneybatter, Cabra and Ashtown benefit from the 15-Minute City principles.

Where there are changes to parking and loading arrangements proposed, these are set out in Chapter 4 in Volume 2 of the EIAR. The assessment of impacts on loading and parking for the Proposed Scheme is set out in Chapter 6 Traffic and Transport in Volume 2 of the EIAR and Appendix A6 Traffic Impact Assessment Report in Volume 4 of the EIAR.

Sections 6.4.6.1.5.4 and 6.4.6.1.6.4 of Chapter 6 in Volume 2 of the EIAR summarise the changes to the parking and loading provisions as a result of the Proposed Scheme within the DCC area.

This will result in impacts on commercial and residential parking in this area which are reported in the above referenced section as follows:

“As shown in Table 6.41, 24 current parking spaces will be affected by the scheme. The proposed amendments to the parking / loading will result in a loss of 20 spaces along Section 4. Where parking is removed, the impact is Slight. Considering the availability of adjacent parking on private driveways, the overall impact is considered to have a Negative, Slight and Long-term effect.”

And

“As shown in Table 6.47 the proposed amendments to parking / loading will result in a loss of 74 spaces along Section 5. Where parking is removed, the impact varies between negligible and high. The overall significance of effect is assessed as Negative, Moderate and Long-term, primarily as a result of the designated paid spaces lost on Manor Street.

This moderate effect is considered acceptable in the context of the planned outcome of the Proposed Scheme, which is to improve accessibility to this local area (on foot, by bicycle and bus) for residents and visitors to local shops and businesses.”

As set out in the Traffic Impact Assessment Report under Sections 6.6.2.2.4, 6.6.2.3.4, 6.6.2.4.4, 6.6.2.5.4 and 6.6.2.6.4, 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, the overall impact of this loss of parking is considered to have a Slight to Moderate Negative effect overall along the Proposed Scheme. This 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.

Section 6.4.6 of Chapter 6 of Volume 2 of the EIAR notes that parking and loading facilities, including disabled parking bays, have been retained in critical areas, such as on Navan Road at Our Lady Help of Christians Church, on Manor Street/Stoneybatter and Aughrim Street. It is further noted that increased provision of cycle parking is proposed as part of the Proposed Scheme. A large number of these proposed cycle parking facilities will be located close to urban villages and areas of commercial activity such as on Manor Street/Stoneybatter, Prussia Street, Blackhall Place, Blackhall Street and Queen Street.

The NTA commissioned a report to assess the economic impact of the infrastructure works, which was based on international published evidence (EIAR Volume 4 Appendices Part 3 of 4 Appendix A10.2 The Economic Impact of the Core Bus Corridors). The evidence examined indicates that the removal of parking spaces is unlikely to have a negative impact on businesses.

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 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.

With regard to access and egress to properties during the Construction Stage, Section 5.5.3.2 of Chapter 5 of the EIAR noted the following:

“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. Details regarding temporary access provisions will be discussed with residents and business owners 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.”

As part of the Accommodation Works process with impacted property owners, the final details of such access arrangements will be agreed.

In relation to the proposed width of relocated/altered accesses there are two specific locations where existing driveways have been altered and a width greater than 3.6m is proposed. A 5.0m wide access is proposed at 141/143 Navan Road as it is a shared driveway and necessary to accommodate appropriate manoeuvring within the properties, as a result of the proposed land take. Special circumstances (as stated by the owners in their objection to the CPO) at 151 Navan Road requires the relocation and widening of the access to facilitate parking with associated manoeuvring within the property to access and egress the property.

DCC made reference to Prussia Street and planning permissions granted along both sides of the street for over 1,200 bed spaces in the form of both student accommodation and Build to Rent units. DCC stated that the additional footfall generated by these developments may give rise to new desire lines across Prussia Street including to the TUD Grangegorman campus. In this context DCC recommended that additional signalised pedestrian crossings be provided along Prussia Street. The NTA are of the view that provision of additional crossings as a result of recently approved applications is a matter for DCC. The provision of these crossings as a result of separately approved planning applications does not fall within the remit of the Proposed Scheme. However should they be required; they should be coordinated with the proposed crossing location for the Proposed Scheme.

DCC made reference to the proposed public realm improvements at the junction of Aughrim Street/Prussia Street/Manor Street. DCC noted that this enhanced public realm area is provided in lieu of existing parking and loading facilities, and request that some parking and loading be retained in this location to serve local businesses. It is further noted that the public realm response requires more detailed consideration in consultation with DCC’s multi-disciplinary public realm team.

The NTA is of the view that this proposed public realm enhancement will contribute significantly to the vitality and attractiveness of the urban village of Stoneybatter. This proposal has been developed through extensive consultation with local residents, businesses and community groups. As set out in the Parking and Loading Report contained in Appendix G of the Preliminary Design Report included in the Supplementary Information, there are 7 no. formal pay and display spaces contained within this area, and no formal loading is identified. There is an existing loading bay on Aughrim Street, approximately 15m away which is retained as part of the Proposed Scheme. On balance the NTA believes that the benefits derived from the provision of such a high-quality urban realm space with significant additional greening, to this urban village outweigh the impacts of the removed parking spaces. The NTA note DCC's comments in relation to more detailed consideration of the urban realm response. 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 Public Realm Team in regard to the design of urban realm elements. The Design team believes that the response provided is appropriate for the setting and context and that the level of detail provided is appropriate to the stage of the project. The NTA look forward to further consultation and collaboration with DCC's Public Realm Team in further refining the urban realm design detailing, subject to the necessary consents.

2.4.7.4 Public Lighting Department 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 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 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.

2.4.7.5 Environmental Protection Division Comments and Recommended Conditions

Response to Section 2.4.7.5 (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. Section 13.4.1.1 of Chapter 13 of Volume 2 of the EIAR 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 are protected waterbodies under Article 4 of the Water Framework Directive. To support the 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.

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.

These points can be grouped under three general headings, which are responded to below:

Sustainable Drainage and Permeability

The drainage design is based on a number of general principles, which are set out in the document 'BusConnects Core Bus Corridor Drainage Design Basis' which is included as Appendix K of the Preliminary Design Report in the Supplementary Information. A SuDS drainage design has been developed as a first preference and in accordance with the SuDS Management Train described in the CIRIA SuDS manual (CIRIA 2015). The CIRIA SuDS Manual recommends that when considering SuDS solutions, the preferred approach is a hierarchy whereby runoff using source control solutions (e.g. pervious surfacing) are considered first. Where source control is not possible or cannot fully address an increase in runoff from a development, residual flows are then managed using site controls (e.g. bioretention / infiltration basins). If this is not practical or residual flows remain above existing runoff rates, regional controls (e.g., oversized pipes) are used. SuDS provide the dual benefits of controlling flow and treating water quality.

In areas where the catchment is proposed to remain unchanged as no additional impermeable areas are proposed, the design consists of relocating existing gullies (where possible) to new locations.

The details of drainage measures proposed for each catchment and subsequently each water body are provided in Table 2.9.1 below which is a reproduction of Table 13.12 in Chapter 13 of Volume 2 of the EIAR. It is noted that no new outfalls are proposed as part of the Proposed Scheme.

Table 2.9.1: Extract from EIAR Chapter 13 detailing change in impermeable surface area and proposed SuDS features

Existing Catchment Reference	Water body	Approx. Surface Area m ²			SuDS and Attenuation Measures Proposed
		Existing impermeable area	Additional permeable area	Percentage change	
Catchment 1	Tolka_040	19332	6097	32	Bio retention areas, Tree Pits, OSP
Catchment 2	Tolka_040	17950	5676	32	Bio retention areas, Tree Pits, OSP, FD, green roof
Catchment 3	Tolka_040	N/A	0	0	None
Catchment 4	Tolka_040	307	94	31	Bio retention areas, FD
Catchment 5	Tolka_040	2347	1577	67	Bio retention areas, FD
Catchment 6	Tolka_040	2901	249	9	Bio retention areas, permeable paving
Catchment 7	Tolka_040	4182	2957	71	Bio retention areas, permeable paving, OSP, FD
Catchment 8	Tolka_040	11413	3029	27	Bio retention areas, permeable paving, FD
Catchment 9	Tolka_040	N/A	0	0	None
Catchment 10	Tolka_040	N/A	0	0	None
Catchment 11	Tolka_050	4126	1892	46	Bio retention areas, FD, Swale
Catchment 12	Royal Canal	19125	4544	24	Bio retention areas, Tree Pits, OSP, FD
Catchment 13	Royal Canal	2888	600	21	Bio retention areas, Tree Pits, FD
Catchment 14	Royal Canal	1253	232	19	Bio retention areas
Catchment 15	Dublin Zoo ponds then Ringsend WwTP	6211	974	16	Bio retention areas
Catchment 16	Dublin Zoo ponds then Ringsend WwTP	11366	1705	15	Tree pits, FD, OSP
Catchment 17	Ringsend WwTP	4382	431	10	Tree pits, FD
Catchment 18	Ringsend WwTP	3474	336	10	Bio retention areas
Catchment 19	Ringsend WwTP	N/A	0	0	Bio retention areas, Tree Pits, FD
Catchment 20	Liffey Estuary Upper	N/A	0	0	Bio retention areas
Catchment 21	Ringsend WwTP	N/A	0	0	Bio retention areas

Note: Filter Drains (FD) Tree Pits (TP) Sealed Drains (SD) Oversized pipes (OSP).

It is noted that the Dublin City Council Sustainable Drainage Design and Evaluation Guide was being developed while this planning application was in preparation and was, therefore, not available during that stage of the overall design process. The NTA confirms that it will take account of this document during the detailed design process.

The NTA also confirms that it will liaise with and develop the detailed design of the scheme drainage in collaboration with DCC Drainage Planning, Policy and Development Section and will similarly liaise and collaborate in relation to connections and diversions. Any additional required surveys on the location and condition of surface water infrastructure sewers will be undertaken by the NTA.

Drainage Details

A number of comments refer to the proposed drainage details included in the ‘BusConnects Core Bus Corridor Drainage Design Basis’ which is noted in section 4.6.14.1 of Chapter 4 of Volume 2 of the EIAR as one of the relevant guidance documents for drainage design. This document is included as Appendix K of the Preliminary Design Report in the Supplementary Information. In this regard it is noted that the Proposed Scheme, and indeed the BusConnects Dublin Infrastructure Works as a whole, interacts with numerous local authorities, who have differing requirements in relation to drainage details.

The BusConnects Core Bus Corridor Drainage Design Basis' document includes options for consideration that have been developed with regard to the necessary standards and good industry practice. The NTA will continue to liaise closely with Dublin City Council Environmental Protection Department and will take their requirements into consideration were aligned with the EIAR.

Flood Risk

The Flood risk associated with the Proposed Scheme is dealt with within the Flood Risk Assessment included in Appendix A13.2 in EIAR Volume 4 Appendices Part 3 of 4. The FRA has been prepared in accordance with the Department of the Environment, Heritage and Local Government (DEHLG) and the Office of Public Works (OPW) Planning System and Flood Risk Management - Guidelines for Planning Authorities (hereafter referred to as the FRM Guidelines) (DEHLG and OPW 2009). The Flood Risk Assessment covers three stages of a Site Specific Flood Risk Assessment (Identification of flood risk, initial flood risk assessment and detailed assessment supported by CFRAM hydraulic modelling). The Flood Risk Assessment also includes the 'Development Management Justification Test' (box 5.1 of the 2009 Planning System Flood Risk Management Guidelines), and concludes that the development satisfies the requirements of the Development Management JT (Justification Test). Refer to section 7.5 of the Flood Risk Assessment report.

In relation to pluvial flood risk, it should be noted that all of the proposed networks have been modelled independently of their length. The proposed networks are attenuated to existing runoff rates before discharging to the existing network. Where possible, SuDS and Green Infrastructure measures have been incorporated, preference has been given to nature based SuDS solutions (tree pits/rain gardens interlinked by filter drains) however the following two constraints were experienced in the design

The SuDS solution will not provide sufficient storage to attenuate the discharge down to the allowable discharge rates. In these situations, oversized pipes will be used to augment the storage capacity of the SuDS solutions

There is no space available in the public realm to accommodate the SuDS solution due to the presence of existing underground utilities in the proposed/existing footpath. In these situations, the only practicable solution will be to utilise oversized pipes.

A separate surface water network will not be provided in areas where there is no space for it due to the presence of existing underground utilities.

Comments relating to Drainage Design

DCC raised a number of comments on the drainage design as follows:

- DCC stated that while an increase in permeable areas in some sections is welcome, consideration should still be given to SuDS treatment of runoff whenever possible. Nature based solutions should be used throughout rather than oversized pipes.

Response: Preference has been given to nature based SuDS solutions (tree pits/rain gardens interlinked by filter drains) however the following two constraints were experienced in the design:

- The SuDS solution did not provide sufficient storage to attenuate the discharge down to the allowable discharge rates. In these situations, oversized pipes were used to augment the storage capacity of the SuDS solutions
 - There was no space available in the public realm to accommodate the SuDS solution due to the presence of existing underground utilities in the proposed/existing footpath. In these situations, the practicable solution was to employ oversized pipes.
- DCC stated that to avoid multiple connections to combined sewers a separate surface water network should be constructed. A justification as to why this approach is taken in some areas and not others should be provided.

Response: A separate surface water network could not be provided in some areas due to lack of space as a result of the presence of existing underground utilities.

- DCC stated that overflow pipes should be shown on the drawings.

Response: Overflow pipes are indicated on the Proposed Surface Water Drainage Works drawings BCIDC-ARP-DNG_RD-0005_XX-DR-CD-1001 – 1003 and drawings BCIDC-ARP-DNG_RD-0005_XX-DR-CD-0001 – 0040 where the viewport is large enough to capture it, in Volume 3 of the EIAR.

- DCC stated that the design should be checked around CH A9000 as there seems to be a discrepancy with DCC records and details shown i.e. DCC CL: 10.97m and IL: 7.78m. Cover levels and inverts should be checked to ensure design is viable throughout.

Response: There is a typo at CH A9000 with regards to the existing CL & IL. This is not a material issue because the proposed tie-in IL at CH A9000 is 9.474m; the design is therefore viable at this point. The design been reviewed throughout to ensure that it is viable.

- DCC stated that there are errors in the drawings, which need to be corrected. One such example is at CH A7250 and shows the discharge point at the Ringsend main lift pump house but the design shows connection to the surface water network which flows through the Phoenix Park. Discharge point and tie-in point should be clarified throughout as they seem to be confused in this submission.

Response: According to record information, there is an existing surface water network in said catchment which does flow through Phoenix Park, but it ultimately discharges to a combined network which outfalls at Ringsend main lift pump house. This network has a high level overflow into Phoenix Park.

2.4.8. Archaeology Section Observations

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

NTA acknowledge that DCC’s Archaeology Section states that the EIAR chapter provides a comprehensive desk study of published and unpublished documentary and cartographic sources, supported by a field study. In the Appendix to the DCC report (at page 46), the Archaeology Section states that it concurs with the findings of the archaeological assessment in the EIAR and supports the proposed mitigation measures assessment of the Proposed Scheme on the architectural heritage, streetscape and urban environment generally has been carried out and the department generally welcomes the proposed mitigation measures across the scheme.

The NTA notes the recommendation set out in the DCC Report Appendix (page 46), from the Archaeology Section that a the NTA appoint a Project Archaeologist to oversee the delivery of the archaeological strategy. In Chapter 15 (Section 15.5.1.1) of Volume 2 of the EIAR it states 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 for archaeological monitoring to be carried out under licence to the DHLGH and the NMI, and will ensure the full recognition of, and the proper excavation and recording of, all archaeological soils, features, finds and deposits which may be disturbed below the ground surface.”

The Archaeology Section also recommends that the primary archaeological paper archive for all excavations be prepared and deposited with the Dublin City Archaeological Archives within a timeframe to be agreed with the planning authority. The NTA will be happy to liaise with DCC at the appropriate time with regard to fulfilling this recommendation.

2.4.9. Conservation Assessment

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

NTA acknowledge that DCC’s Conservation Department stated as a general response that a comprehensive assessment of the Proposed Scheme on the architectural heritage, streetscape and urban environment generally has been carried out and the department generally welcomes the proposed mitigation measures across the scheme.

It is further noted that the department welcomes the Landscape-Townscape Visual Assessment documented in Chapter 17 of the EIAR.

The NTA note that the Conservation department stated that some elements of architectural heritage have not been correctly labelled or have been incorrectly labelled in the documents and on the supporting mapping. The submission stated that these elements are set out in detail in ‘the Conservations Report’. The NTA note that no accompanying Conservation Report is included with the DCC submission and as such cannot comment on the specifics of this point.

DCC stated that the following policies and provisions in particular should be taken into account in the consideration of all proposed routes and their impacts on the architectural and built heritage of the city:

- DCC Development Plan 2016 – 2022 (Volume 1 – Chapter 11) – Policy CHC2; CHC3; CHC4; CHC7.

Chapter 16 (Architectural Heritage) has had regard to the relevant policies and provisions of the DCC Development Plan 2016-2022 and also the draft DCC Development Plan 2022-2028. These are listed in Section 16.2.4 of Chapter 16. In terms of the specific policies a number of them are referenced in the EIAR as follows:

- CHC2 is referenced in Section 16.3.1.3 of Chapter 16;
- CHC4 and CHC7 is referenced in Section 16.3.1.4 of Chapter 16.

DCC state that the applicant should comply with the following guidelines:

- Architectural Heritage Protection Guidelines for Planning Authorities 2011;
- Paving – The conservation of historic ground surfaces.

Both the above named guidelines are referenced in Chapter 16 in Volume 2 of the EIAR. For instance, in Section 16.5 (Mitigation), it is acknowledged that Appendix A16.3 in Volume 4 of the EIAR (Methodology for Works Affecting Sensitive and Historic Fabric), has been prepared in accordance with the above two sets of guidelines.

DCC quote the Dublin City Tree Strategy 2016 to 2020. This document is referenced in Chapter 17 of Volume 2 of the EIAR (in Section 17.2.2.2 and 17.2.3).

DCC went on to state that the photomontages provided are limited and not to sufficiently assess the effects of the proposed route on views and visual amenities in specific locations, in particular through the historic inner-city area.

The NTA note this point raised by DCC, however, it respectfully disagrees with the contention that the number of photomontages is limited and are not sufficient to assess the impacts of the Proposed Scheme. The NTA are satisfied that the photomontage views have been selected to show changes in the areas of the greatest/significant changes. In Chapter 17 (Section 17.5.2.1) of Volume 2 of the EIAR, it states that

‘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 proposed views are shown with proposed planting at approximately 10 – 15 years post completion of the Construction Phase....’

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 and their Setting

The NTA notes that DCC made specific reference to a number of protected structures:

1. DCC noted that the proposed new cantilever signal pole and alteration to the public realm in the vicinity of St. Vincent’s Home on the Navan Road (RPS 5808), will negatively impact on the setting of the protected structure. DCC requested that a further review of the signal requirements at this location be undertaken. DCC also noted that the existing bus shelters in this location detract from the setting of the protected structure. DCC requested that rather than retain these bus shelters as is proposed, that the Proposed Scheme relocate them further east.

In relation to the proposed cantilever signal pole, the NTA recognises the importance of the rationalisation of street furniture 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. In this location a cantilever signal pole is required to deliver the Proposed Scheme. Section 16.4.4.1 of Chapter 16 of Volume 2 of the EIAR notes the following in relation to this location:

“St Vincent’s Home, Navan Road (DCC RPS 5808), where kerbs are to be realigned to accommodate a new cycle track, resulting in the loss of existing grass verges and semi-mature roadside trees to the southeast of the existing gate lodge. A new cantilevered signal is proposed to the northwest of the historic entrance and gate lodge. The existing surfaces, at three of the gates are to be upgraded to stone pavers or setts. The existing northbound bus-stop and shelter will be retained in their current positions. St. Vincent’s Home is of Medium sensitivity. The proposed alterations do not directly impact on any historic fabric. The magnitude of the impact on the setting of the Protected Structure is Low. The potential Operational Phase impact is Negative, Slight and Medium-term.”

In relation to the retention of the bus shelter in this location, as stated in section 4.6.4.5 of Chapter 4 of Volume 2 of the EIAR, a review of existing bus stops along the route of the Proposed Scheme has been carried out and the findings are documented in Appendix H of the Preliminary Design Report contained in the Supplementary Information. The existing location of the bus stop in this location is deemed to be the optimum location in the context of the spacing of preceding and subsequent bus stops. There will be no increased impact on the Protected Structure when comparing the Do Minimum and Do Something scenarios.

Section 4.14.3 of the Preliminary Design Report, included in the Supplementary Information outlines the requirement for Bus Shelters as part of the Proposed Scheme as follows:

“Bus shelters provide an important function in design of bus stops. The shelter will offer protection for people from poor weather, with lighting to help them feel more secure. Seating will be provided to assist ambulant disabled and older passengers and accompanied with Real Time Passenger Information (RTPI) signage to provide information on the bus services.”

As such, bus shelters have been provided where practicable as part of the Proposed Scheme.

2. DCC noted that 74 Manor Street (RPS ref. 4586) has the potential to be negatively impacted by the provision of new signage in close proximity to it. The NTA recognises the importance of the rationalisation of street furniture (including traffic management signage), however, the proposed no left turn sign is required in this location to avoid traffic bypassing the proposed Bus Gate on Manor Street by diverting to Manor Place.
3. DCC stated there will be an adverse impact of the proposed cycleway through the stone setts on the curtilage of the entranceway at the Sisters of Charity Convent (RPS 4872).

As highlighted on the Landscape General Arrangement drawings, the majority of these historic setts will be re-laid within the footpath section of the Proposed Scheme which will retain the positive contribution which they provide to the Protected Structure. The proposed landscaping along Manor Street is considered to complement the existing paving.

4. DCC stated that the retention of the existing bus stop and shelter immediately outside of the boundary wall of the Law Society grounds on Blackhall place, which includes the former Blue Coat school and is on both the RMP (DU018-202177) and RPS (765) and has been rated of National importance by the NIAH. DCC requested that consideration should be given to relocating the stop and shelter to in front of the modern building on the corner of Blackhall Place and Hendrick Place.

As previously outlined, a comprehensive review of existing bus stops along the route of the Proposed Scheme has been carried out and is documented in Appendix H of the Preliminary Design Report contained in the Supplementary Information. Refer to Chapter 4 in Volume 2 of the EIAR (Section 4.5) of the location of bus stops. The existing location of the bus stop is deemed to be the optimum location in the context of the spacing of preceding and subsequent bus stops and is set adjacent to proposed pedestrian crossing at Blackhall Street. The existing shelter is set close to the wall and boundary railings

to the Law Society grounds on Blackhall Place and is largely screened from the Law Society Buildings by the boundary treatment.

Section 4.14.3 of the Preliminary Design Report, included in the Supplementary Information outlines the requirement for Bus Shelters as part of the Proposed Scheme as follows:

“Bus shelters provide an important function in design of bus stops. The shelter will offer protection for people from poor weather, with lighting to help them feel more secure. Seating will be provided to assist ambulant disabled and older passengers and accompanied with Real Time Passenger Information (RTPI) signage to provide information on the bus services.”

As such, bus shelters have been provided where practicable as part of the Proposed Scheme.

5. DCC referred to proposed urban realm changes at St. Peter’s Catholic Church (RPS 1730), North Circular Road, which is a prominent landmark situated in the Phibsborough Centre Architectural Conservation Area (ACA), which they note may impact on the character of the ACA, in particular the provision of new bus shelters at existing bus stops. DCC stated that the provision of bus shelters in close proximity to the Protected Structure would negatively impact on its character and setting, including important vistas. DCC further went on to state that consideration should be given to providing a high quality stone surface and/or low level soft landscaping to the front of the church.

With regard to the proposed bus shelters in this location the proposed bus shelter on Cabra Road will replace a cluster of fingerpost bus stops, reducing street clutter. The shelter on the North Circular Road will also be partly obscured by the existing and proposed trees along the North Circular Road.

With regard to the suggestion of providing high quality stone surfacing and/or low-level soft landscaping to the front of the church, this junction has been included within the Proposed Scheme is to facilitate the introduction of a right turn from Cabra Road to North Circular Road and a left turn from North Circular Road onto Cabra Road. There will be no direct impact on the church or ACA from the proposed works. Consideration of appropriate materials will be considered.

6. DCC noted that it is proposed to retain an existing bus stop and shelter adjacent to the Former Baptist church (RPS 7132) on North Circular Road. DCC further noted that the shelter is in front of a short terrace of two-storey 19th century brick properties at Nos. 328-334 North Circular Road which DCC stated are considered to contribute to the character of the Phibsborough Centre ACA.

The sole reason why this junction has been included within the Proposed Scheme is to facilitate the introduction of a right turn from Cabra Road to North Circular Road and a left turn from North Circular Road onto Cabra Road. The existing location of the bus stops at this junction will remain. There will be no increased impact on the Protected Structure when comparing the Do Minimum and Do Something scenarios. The short terrace of 19th century brick properties at Nos. 328-332 North Circular Road have previously lost their front gardens and have suffered a loss of character. Only 334 retains its front garden and railings. The existing shelters avoid the private landings at Nos. 328-332 North Circular Road.

The Landscaping General Arrangement drawing in Volume 3 of the EIAR (BCIDC-ARP-ENV_LA-05_XX_00-DR-LL-0001) indicates that two banks of native planting will be added in front of and to the west of the former Baptist church. This will soften the impact of the shelter on the Church and ACA and will have a positive impact on vistas along the North Circular Road.

Section 4.14.3 of the Preliminary Design Report, included in the Supplementary Information outlines the requirement for Bus Shelters as part of the Proposed Scheme as follows:

“Bus shelters provide an important function in design of bus stops. The shelter will offer protection for people from poor weather, with lighting to help them feel more secure. Seating will be provided to assist ambulant disabled and older passengers and accompanied with Real Time Passenger Information (RTPI) signage to provide information on the bus services.”

As such, bus shelters have been provided where practicable as part of the Proposed Scheme.

7. DCC noted that there are a number of additional structures included on the Record of Protected Structures on the subject map sheets. DCC noted that no direct impacts on these structures are apparent, however there may be indirect impacts as a result of the proposed works during the Construction phase.

DCC noted that protected structures in close proximity to construction works should be adequately protected and all works should be supervised by a conservation professional.

The NTA note these comments. Section 16.5.1.1 sets out the proposed mitigation measures when working in the vicinity of Protected Structures:

“Indirect physical Construction Phase impacts are anticipated where there is potential for damage to be caused sensitive fabric associated with protected structures, inside or on the boundary of the Proposed Scheme, during construction. The pre-mitigation impact magnitude is Medium. The proposed mitigation is the 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 Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR. With mitigation, it is anticipated the magnitude of impact would reduce from Medium to Negligible.”

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

The NTA notes that DCC made specific reference to a number of locations under this heading:

1. DCC noted that it is proposed to locate a bus stop on Manor Street in front of Nos. 67-70. DCC noted that No. 69 (NIAH 50070089) is considered to be of Regional Importance. DCC noted that the location of a bus stop in the immediate vicinity of the historic structure will adversely affect its setting.

As previously outlined, a comprehensive review of existing bus stops along the route of the Proposed Scheme has been carried out and is documented in Appendix H of the Preliminary Design Report contained in the Supplementary Information. The proposed siting of the bus stop in this location is deemed to be the optimum location in the context of the spacing of preceding and subsequent bus stops. It is noted that the proposed bus shelter is located outside of nos. 67 and 68 Manor Street, and that there is currently on street parking in front of No. 69, which is proposed to be removed as part of the Proposed Scheme to facilitate the provision of a cycle track as well as tree planting and greening. The proposed shelter will be closest to Number 68, which was partly rebuilt in the 20th century, and is thus of low sensitivity in architectural heritage terms. By siting the shelter adjacent to 68 the proposal has avoided impacting buildings of higher sensitivity on the street. The proposed planting enhances the setting of the historic buildings in Manor Street and will also minimise the impact of the proposed shelter on the streetscape.

Section 4.14.3 of the Preliminary Design Report, included in the Supplementary Information outlines the requirement for Bus Shelters as part of the Proposed Scheme as follows:

“Bus shelters provide an important function in design of bus stops. The shelter will offer protection for people from poor weather, with lighting to help them feel more secure.

Seating will be provided to assist ambulant disabled and older passengers and accompanied with Real Time Passenger Information (RTPI) signage to provide information on the bus services.”

Refer also to Chapter 4 in Volume 2 of the EIAR. Section 4.5 provides details of the locations of bus stops/shelters, while Section 4.6.4.6 sets out the general policy regarding the provision of bus shelters on the Proposed Scheme.

2. DCC noted that the railway bridge carrying Old Cabra Road over the railway line to Amiens Street and North Wall (NIAH 50060148) currently contains a bus stop by its north parapet. DCC noted that the positioning of this bus stop on the deck of the historic bridge has an adverse impact on its character and it is noted that it is proposed to retain the bus stop in this location as part of the Proposed Scheme.

As previously outlined, a comprehensive review of existing bus stops along the route of the Proposed Scheme has been carried out and is documented in Appendix H of the Preliminary Design Report contained in the Supplementary Information. Refer to Chapter 4 in Volume 2 of the EIAR (Section 4.5) of the location of bus stops. The existing location of the bus stop in this location is deemed to be the optimum location in the context of the spacing of preceding and subsequent bus stops.

There will be no increased impact on the Protected Structure when comparing the Do Minimum and Do Something scenarios.

Section 4.14.3 of the Preliminary Design Report, included in the Supplementary Information outlines the requirement for Bus Shelters as part of the Proposed Scheme as follows:

“Bus shelters provide an important function in design of bus stops. The shelter will offer protection for people from poor weather, with lighting to help them feel more secure. Seating will be provided to assist ambulant disabled and older passengers and accompanied with Real Time Passenger Information (RTPI) signage to provide information on the bus services.”

Refer also to Chapter 4 in Volume 2 of the EIAR. Section 4.6.4.6 sets out the general policy regarding the provision of bus shelters on the Proposed Scheme.

3. DCC noted that it is proposed to relocate a number of post boxes, namely:

- NIAH 50060147 located on the corner of Old Cabra Road and Glenbeigh Road;
- NIAH 50070519 on Blackhall Place;
- NIAH 50070518 on Prussia Street; and
- CBC0005PB001 on the Navan Road, near Kempton Avenue. DCC noted that this freestanding cast-iron pillar box, which dates to c.1895 has not been recorded by the NIAH.

DCC highlighted that there is potential for these post boxes to be damaged during relocation. DCC noted that recording of the post boxes in their current location prior to removal and the supervision of the work by a conservation professional will be required.

Section 16.5.1.5.1 of Chapter 16 of the EIAR sets out the proposed mitigation measures with regard to post boxes:

“Three post boxes of architectural heritage significance were identified in the Study Area which it is anticipated, will be directly impacted as a result of the Proposed Scheme. These include the post box on Kempton Avenue (CBC0005PB001), the post box at the junction of Glenbeigh Road and Old Cabra Road (CBC0005PB002), the post box on Blackhall Place (CBC0005PB004). The potential pre-mitigation Construction Phase Impact is Negative, Significant and Long-Term. The proposed mitigation is the recording of the post boxes in position prior to the works, the labelling of the affected fabric prior to its careful removal to safe storage, and their reinstatement in new positions in close proximity (within 2m) of their existing positions. Recording is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor. The architectural heritage specialist will oversee the labelling, taking-down and reinstatement. The works to the 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 kerb alterations and the proposed cycle lanes will mean that the relocated post-box will be set back from the traffic helping to protect it into the future. With mitigation, the magnitude of impact is reduced from High to Low. The predicted residual impact is Negative, Slight and Long Term.

Indirect impacts are anticipated to the remaining post boxes (CBC0005PB003 and CBC0005PB005), during the Construction Phase, due to the potential for disruption of the use of the post boxes, the potential for damage of the fabric of the post boxes, and the adverse visual impact of the construction works on their settings. The potential pre-mitigation Construction Phase Impact is Negative, Moderate and Temporary. The proposed mitigation is the recording, protection and monitoring prior to and during 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 and in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR. With mitigation, the magnitude of impact is reduced from Medium to Negligible. The predicted residual Construction Phase impact is Negative, Not Significant and Temporary.”

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

1. DCC made reference to the No. 9 electric tram, which ran from Donnybrook to Phoenix Park along North Circular Road, and which crossed a section of the Proposed Scheme on Sheet 31 (DCIHR 18 06 009). DCC noted that the DCIHR notes the potential for tramlines to survive beneath the existing road surface. DCC noted that there is potential for extensive areas of resurfacing across the Proposed Scheme. DCC acknowledged that archaeological monitoring under licence, as defined in Chapter 15 in Volume 2 of the EIAR, will take place to include all DCIHR sites.

The NTA note the comments from DCC in this regard. The potential presence of these tramlines is noted within Section 15.4.3.5.1.3 of Chapter 15 in Volume 2 of the EIAR, as follows:

“The tramway (DCIHR 18-06-009) of the Numbers 9 and 10 services ran from Phoenix Park to O’Connell Street along the R101 North Circular Road (NCR) and the Proposed Scheme will cross this route at the junction with Old Cabra Road and Prussia Street, as well as along a section of the R101 NCR. Although not visible, there is every possibility that the original tramlines survive below the existing road surfaces and will be affected by any ground-breaking works at this location. The tramline has a low sensitivity value and the magnitude of impact is medium, and as only a small section of the former tramline is affected, therefore the potential impact is Negative, Slight and Permanent.”

As noted by DCC, archaeological monitoring under licence will take place to include all DCIHR sites. This is outlined in Section 15.5.1.7.1 of Chapter 15 in Volume 2 of the EIAR which states that archaeological monitoring will take place at all undesignated archaeological heritage sites identified from the DCIHR.

2. DCC made further reference to a Dublin Corporation tram which ran along Queen Street, George’s Lane and terminated at a depot on Stanley Street, which crossed a section of the Proposed Scheme on Sheet 34 (DCIHR 18 07 045). DCC noted that exposed section of the tramlines set within a cobbled road surface extend partly into the Proposed Scheme at Brunswick Street North, but DCC stated that the proposal for this section of the scheme is unclear. DCC noted that the Landscaping General Arrangement Drawings state that the paving setts and tracks are to be ‘retained or reinstated’, while Section 1.2.2.8 of Appendix A16.1-A16.3 in Volume 4 of the EIAR states that the ‘existing tramlines and historic setts will be integrated into the proposed paving design where possible.’ DCC went on to state that as few tangible reminders of the city’s tram network survive, that these features will be required to be retained and protected. DCC requested clarity in relation to the proposals for the exposed section of tram tracks at Stanley Street/Brunswick Street North and stated that any direct conflict with the Proposed Scheme should be designed out to facilitate the retention of these features in situ. DCC acknowledged that archaeological monitoring under licence, as defined in Chapter 15 in Volume 2 of the EIAR, will take place to include all DCIHR sites.

As noted on the Landscaping General Arrangement drawings, the existing stone paving and tracks are to be retained or reinstated in their current location. Section 1.2.2.8 of Appendix A16.1-A16.3 in Volume 4 of the EIAR refers more generally to interactions with existing tramlines and historic setts.

This tramline is referenced in Chapter 15 and assessed in Chapter 16 of the EIAR. The following is noted in this regard:

“Two locations were identified where cobbled surfaces of Medium sensitivity on Stanley Street (CBC0005BTH044) and Hendrick Place (CBC0005BTH037) may be indirectly impacted where there is potential for damage during construction. The potential pre-mitigation Construction Phase Impact is Negative, Moderate and Temporary. The proposed mitigation is the recording, protection and monitoring prior to and during 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 and in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR. With mitigation, the magnitude of impact is reduced from Medium to Negligible. The predicted residual Construction Phase impact is Negative, Not Significant and Temporary.”

3. DCC noted that the route of the Proposed Scheme passes along the site of the old City Cattle Market (DCIHR 18 06 010) located on the western side of Prussia Street. DCC noted that the market has been replaced with housing, but the historic entrance gates survive on Prussia Street and are protected (RPS 6874). DCC noted that the setting of this entrance could potentially be impacted by landscaping works in front of them and recommended that any works in the vicinity of this entrance be supervised by a conservation professional.

This cattle market is referenced in Chapter 15 in Volume 2 of the EIAR. There are no landscaping works proposed in this location and as such no impact is envisaged. Section 15.5.1.7.1 of Chapter 15 of the EIAR states that archaeological monitoring will take place at all undesignated archaeological heritage sites identified from the DCIHR. In addition, Chapter 16 (Section 16.5.1.1) in Volume 2 of the EIAR outlines the proposed mitigation for indirect impacts to protected structures. The proposed mitigation is the 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 Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of the EIAR.

4. DCC noted that the route of the Proposed Scheme terminates near the site of the former Gravel Walk Slip which provided access to the River Liffey (DCIHR 18 11 214). DCC stated that it is possible that remains of the slipway survive beneath the current carriageway. DCC acknowledged that archaeological monitoring under licence will take place to include all DCIHR sites.

The potential presence of this slipway is noted in Chapter 15 in Volume 2 of the EIAR. Section 15.4.3.5.1.3 notes the following:

“A gravel slipway was located on the foreshore of the River Liffey where Blackhall Place is now located (DCIHR 18-11-214). While there is no above-ground trace, subsurface features may survive and be affected by any ground-breaking works at this location. The non-designated archaeological site has a low sensitivity value and the magnitude of impact is medium, therefore the potential impact is Negative, Slight and Permanent.”

As highlighted by DCC, Section 15.5.1.7.1 of Chapter 15 in Volume 2 of the EIAR states that archaeological monitoring will take place at all undesignated archaeological heritage sites identified from the DCIHR.

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

1. DCC noted that a number of houses (sheets 21-28) which contribute positively to the streetscape but are not protected under the RPA or recorded on the NIAH, will be impacted by proposed land-take (both temporary and permanent) including the alteration of boundaries that retain historic fabric as well as the loss of associated planting and grass verges. DCC noted that although modest in their design, the variety of boundary treatments along Navan Road illustrates the development of the city’s early to mid-twentieth century suburbs, and their loss represents an erosion of the special character of the streetscape in suburban areas.

As highlighted in section 4.5.4.1 of Chapter 4 in Volume 2 of the EIAR, boundary treatment will generally match existing. As such, the NTA does not believe that there will be an erosion of the special character of the area along the Navan Road due to the proposed land acquisition.

2. DCC noted that there is a lack of clarity in relation to the duration and therefore the impact of land acquisition associated with the Proposed Scheme. DCC referenced a number of locations where there appears to be temporary land acquisition, but no detail has been provided in relation to the reinstatement of boundary treatments:
 - No. 225 Navan Road;
 - Nos. 257 and 255 Navan Road;
 - Nos. 262 and 264 Navan Road; and

- Nos. 383-397 Navan Road (odd).

DCC further noted that Nos. 137-165 (odd) comprise largely detached houses, including early 20th century bungalows, many of which have mature gardens and intact boundary treatments. DCC noted that it is proposed to provide revised vehicular entrances of 3.6m wide and laneway access at Nos. 143 and 141 will be widened to 5.8m.

As noted in section 4.5.4.10 of Chapter 4 in Volume 2 of the EIAR, *“Temporary land take is also required from properties to allow driveways and accesses to be regraded”*. The properties noted by DCC will require re-grading of driveways to tie in with proposed new footpath levels.

The NTA notes that the proposed boundary treatment at each impacted property is outlined on the Fencing and Boundary Treatment drawings, included in Volume 3 of the EIAR.

As noted in section 4.6.11.5.3 of Chapter 4 in Volume 2 of the EIAR, *“In general, property boundaries will be reinstated on a ‘like for like’ basis, including any walls, piers, fences, railings, gates, driveway finishes and private landscaping. Private grounds that are utilised in part for construction access will be reinstated following completion of the works to match the existing landscaping of the property. Where private grounds are reduced by permanent land take required for the scheme, the remaining grounds will be reinstated to match the landscape and character of the existing grounds in consultation with the property owner.”*

As noted on the General Arrangement Drawings in Volume 3 of the EIAR, *“Unless Noted Otherwise, where boundary walls/fences are being relocated and the existing access is less than 3.6 m in width, maximum width of new access will be 3.6 m, with the new driveway tying in with the existing driveway at the temporary land acquisition boundary.”*

The proposed maximum width is consistent with Dublin City Council’s ‘Parking Cars in Front Gardens’ document.’

Refer to section 2.4.7.3 Roads Department for a response on proposed access widths at 141/143 Navan Road.

3. DCC noted a number of locations where there appears to be permanent acquisition as details have been provided in relation to reinstatement of boundary treatment and vehicular access:

- Nos. 110-116 (even) Navan Road;
- Nos. 122 and 124 Navan Road;
- Nos. 198-212 (even Navan Road);
- No. 263 Navan Road (to include proposed relocated access to facilitate new junction layout);
- Nos. 265-323 Navan Road (odd nos. between Ashtown Grove and Kinvara Avenue); and
- Nos. 331-351A Navan Road.

DCC stated that in most cases the boundary treatment is to match the existing and vehicular entrances are to be a maximum of 3.6m wide.

The NTA note this comment. A number of these properties noted by DCC are being subject to temporary land acquisition only. A full schedule of the proposed land acquisition is included in the CPO Schedule submitted as part of the subject Planning Application.

4. DCC noted that the removal and reinstatement of existing boundary treatments to unprotected structures should be carefully considered, particularly where these are of some quality and reflect a considered design intent respondent to the parent structure through the use of complementary detailing and materials. DCC noted that the reconstruction of these features should match as closely as possible the historic detailing/finishes. DCC went on to state that where accesses are widened, new gates should be facsimiles of the original allowing for the widened detail. DCC noted that these works should be designed and supervised by an expert in architectural conservation.

Section 5.5.2.1 of Chapter 5 in Volume 2 of the EIAR sets out the proposed methodology in relation to impacts to existing boundaries:

“Condition surveys of properties adjacent to the Proposed Scheme that the works have the potential to affect will be undertaken prior to works commencing. Liaison with impacted landowners will be carried out in advance of commencement of boundary works to properties.

Boundary works will be commenced where both permanent and temporary land acquisition is required to ensure that sufficient space is available to construct the Proposed Scheme. Boundary treatments will be carried out on a section-by-section basis (with sections / sub-sections defined in section 5.3), and in line with the traffic management stages set out in section 5.8.3.

This will be a mixture of boundary walls / fencing along industrial / commercial land, railings along parks and temporary boundaries, as required. Any land temporarily acquired from a landowner will only be utilised for the purposes of undertaking boundary works or accommodation works related to the land in question.

Any lands acquired temporarily to facilitate construction work will be returned to landowners on completion of the works. Existing boundary walls or fencing being relocated will be constructed to match the existing conditions, unless otherwise agreed. The removal of trees, vegetation, lawns, paving etc will be minimised in so far as practicable.”

Architectural Conservation Areas (ACAs) and Conservation Areas

1. DCC referred to their earlier commentary in relation to the bus stop adjacent to RPS 7132 within the Phibsborough Centre ACA. A response in relation to this item has been provided earlier in this response document.
2. DCC noted that the Proposed Scheme passes through red-hatch conservation areas at Prussia Street and Blackhall Place. DCC stated that the cumulative effect of additional signage and street furniture, bus gate, bus shelters/stops and changes to the urban realm may impact on the character of historic urban streetscapes of these areas. DCC noted that it is not clear what measures/interventions are proposed to provide a new bus gate at the junction between Stoneybatter and Blackhall Place. DCC noted that the location and design of new infrastructure, signage and bus stops/shelters should be more carefully considered with the aim of minimising potential negative visual impacts, to support the reduction of clutter and to improve legibility of the historic streetscapes and adjacent heritage structures of the Conservation Area.

Section 16.3.1.5 of Chapter 16 in Volume 2 of the EIAR outlines the Conservation Areas (CAs) which are relevant to the Proposed Scheme. Both the Prussia Street CA and the Blackhall Street CA have been considered and assessed. Section 16.4.4.2 of Chapter 16 in Volume 2 the EIAR notes the following in relation to the Operational Stage impacts:

“The Prussia Street CA is of Medium sensitivity. The proposed works in the CA are minor, the magnitude of their impact is Negligible. The potential Operational Phase impact on the Prussia Street CA is Neutral, Not significant and Long-term.

The Blackhall Place CA is of High sensitivity. The proposed works in the CA include minor changes to kerb lines and the relocation of one lamp post, to accommodate altered traffic, bus and cycle lanes. The magnitude of impact of the Proposed Scheme on the CA is Low. The potential Operational Phase Impact is Neutral, Slight and Long-term.”

As such, no significant impacts on these Conservation Areas have been identified as a result of the Proposed Scheme.

3. DCC noted that it is proposed to retain an existing bus stop and provide a bus shelter on the east side of Blackhall Place, adjacent to a number of modest two-storey brick dwellings including Nos. 54 and 56 Blackhall Place, both of which are on the NIAH and are considered to contribute to the character of the conservation area. DCC noted that the existing bus stop is marked by a simple ‘lollipop’ type sign of limited visual impact and noted that no details have been provided in relation to the new bus shelter.

The NTA notes these comments. Section 4.14.3 of the Preliminary Design Report, included in the Supplementary Information, outlines the proposals for bus shelters (which are listed in Section 4.5 of Chapter 4 of Volume 2 of the EIAR). Refer also to Chapter 4 in Volume 2 of the EIAR. Section 4.6.4.6 sets out the general policy regarding the provision of bus shelters on the Proposed Scheme. Section 4.14.3 of the Preliminary Design Report states as follows:

“Bus shelters provide an important function in design of bus stops. The shelter will offer protection for people from poor weather, with lighting to help them feel more secure. Seating will be provided to assist ambulant disabled and older passengers and accompanied with Real Time Passenger Information (RTPI) signage to provide information on the bus services. The locations of the bus shelters are presented on the General Arrangement drawing series in Appendix B.

The optimum configuration that provides maximum comfort and protection from the elements to the travelling public is the 3-Bay Reliance ‘mark’ configuration with full width roof. This shelter is a relatively new arrangement which has been developed by JCDecaux in conjunction with the NTA. The shelter consists mainly of a stainless-steel structure with toughened safety glass and extruded aluminium roof beams. Figure 4.8 (reproduced as Figure 2.9.1 below) provides an example image of the preferred full end panel shelter arrangement. The desirable minimum footpath/island widths required to accommodate the full end panel shelter is 3.3m with an absolute minimum width of 3m to facilitate a minimum 1.2m clearance at the end panel for pedestrians. Alternative arrangements for more constrained footpath widths are considered below.



Figure 2.9.1: Example of a 3-Bay Reliance full end panel bus shelter (source: JCDecaux)

The cantilever shelter using full width roof and half end panel arrangement provides a second alternative solution for bus shelters in constrained footpath locations.

Figure 4.9 (reproduced in Figure 2.9.2) provides an example of this type of shelter. Advertising panels in this arrangement are normally located on the back façade of the shelter compared to the full end panel arrangement.

The desirable minimum footpath/island widths required to accommodate the full end panel shelter is 2.75m with an absolute minimum width of 2.4m to facilitate a minimum 1.2m clearance at the end panels for pedestrians.



Figure 2.9.2: Example of a 3-Bay Reliance Cantilever Shelter with full width roof and half end panels (source JC Decaux)

Two alternative narrow roof shelter configurations (Figure 4.10) (reproduced in Figure 2.9.3) are also available which offer reduced protection against the elements compared to the full width roof arrangements. These shelter configurations are not preferred but do provide an alternative solution for particularly constrained locations where cycle track narrowing to min 1m width has already been considered and 2.4m widths cannot be achieved to facilitate the full width roof with half end panel shelter. The desirable minimum footpath widths for the narrow roof configuration are 2.75m (with end panel) and 2.1m (no end panel). The absolute minimum footpath widths for these shelters are 2.4m (with end panel) and 1.8m (no end panel) to allow for boarding and alighting passengers in consideration of wheelchair, pram, luggage and other such similar spatial requirements.”



Figure 2.9.3: Example of a 3-Bay Reliance Cantilever shelter with narrow roof configuration with and without half end panels (source: JCDecaux)

Chapter 16 of the EIAR outlines the assessment that has been carried out in relation to structures of Architectural Heritage Interest.

The proposed shelter will be located to the north of Nos. 54 and 56 Blackhall Place and will be located at the back of the footpath. It predominantly affects the rendered warehouse wall to the north of No. 54. This wall is not of heritage interest. No significant impact was identified in the location referenced by DCC.

4. DCC noted that it is proposed to retain an existing bus stop and provide a bus shelter on the east side of Blackhall Place, outside No. 2-8 Blackhall Place which form part of a terrace of modest two-storey housing built by the Dublin Artisans' Dwellings Company in 1894. DCC noted that that the existing bus stop is marked by a simple 'lollipop' type sign of limited visual impact and note that no details have been provided in relation to the new bus shelter.

The NTA notes these comments. Section 4.14.3 of the Preliminary Design Report, included in the Supplementary Information, outlines the proposals for bus shelters, as outlined in response to the above point. Refer also to Chapter 4 in Volume 2 of the EIAR. Section 4.6.4.6 sets out the general policy regarding the provision of bus shelters on the Proposed Scheme. Chapter 16 in Volume 2 of the EIAR outlines the assessment that has been carried out in relation to structures of Architectural Heritage Interest. No significant impact was identified in the location referenced by DCC above.

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

1. DCC noted that a section of historic granite kerbstone survives in two sections along the northeast side of Old Cabra Road (outside Nos. 54-64 and No. 74). DCC note that these are to be removed to facilitate the provision of a cycle lane, though the extent of removal is unclear. DCC noted that the route as illustrated on the General Arrangement drawings would indicate that all sections of kerbstones will be removed. DCC noted that these granite kerbstones are an important historic survivor along the street and should be retained.

The NTA notes these comments. Chapter 16 in Volume 2 of the EIAR has considered these sections of historic kerb as Paving and Surface treatment (feature reference no. CBC0005BTH010). Section 16.5.1.5.3 of Chapter 16 in Volume 2 of the EIAR notes that these sections of kerbs are to be removed to facilitate the Proposed Scheme and the residual impact, following mitigation is outlined in table 16.17 as Direct, Negative, Slight and Long-Term.

2. DCC noted that two short sections of granite kerbing survive to the front of Nos. 84-87 Prussia Street. DCC noted that the impact of the proposed works on these features is unclear and note that the surviving kerbstones should be retained.

The NTA notes these comments. Chapter 16 of the EIAR has considered these sections of historic kerb as Paving and Surface treatment CBC0005BTH021. It is a street surface of Low sensitivity and is identified in section 16.3.1.10.4 of Chapter 16 in Volume 2 of the EIAR. As stated in section 16.4.3.6.3 of Chapter 16 in Volume 2 of the EIAR it was initially thought that it was one of six locations where kerbs would be retained in position and will not be directly impacted by the Construction Phase works. However, it is likely that the kerbstones in front of 84-87 Prussia Street will need to be removed and repositioned (in the EIAR it was incorrectly assessed as remaining in-situ). A potential indirect impact was identified as the proximity of the construction works carries a risk of accidental damage, the magnitude of which is Medium. The potential Construction Phase impact was determined as Negative, Slight and Temporary. The removal of the kerbs carries a potential risk of loss or damage, the magnitude of which is High. The temporary removal will also have a negative visual impact the magnitude of which is Low. The potential Construction Phase impact will be Negative, Moderate and Temporary (without mitigation). The EIAR contains mitigation for those instances where kerbs need to be removed and reinstated as follows - recording of the kerbs in position prior to the works, the labelling of the affected fabric prior to its careful removal to safe storage. Recording is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor. The kerbs lining the footpath on Prussia Street (CBC0005BTH021) are to be reinstated in new positions in close proximity (within 2m) of their existing positions by the appointed contractor. The architectural heritage specialist will oversee the labelling, taking down and reinstatement. The works to the 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. With mitigation, the magnitude of impact is reduced from High to Low. The predicted residual impact is Negative, Slight and Long-Term.

3. DCC noted that stone setts and limestone kerbstones located at the entrance to the Sisters of Charity Convent on Manor Street appear to be modern, but that they make a positive contribution to the arched entrance and stone gate lodge (RPS 4872). DCC noted that these may be impacted upon to facilitate the provision of a cycle track. DCC recommended that the setts and kerbstones be retained.

- The NTA notes this comment. As highlighted on the Landscape General Arrangement drawings of Volume 3 of the EIAR, the majority of these historic setts will be re-laid within the footpath section of the Proposed Scheme which will retain the positive contribution which they provide to the arched entrance and stone gate lodge.

4. DCC noted that coal hole covers are to be retained to an area of paving adjacent to No. 16 Stoneybatter and No. 35 Stoneybatter. DCC noted that the location of these is not clear, nor is it clear whether the proposed works will impact on any basement/cellar areas below.

The NTA notes this comment. As noted on the Landscape General Arrangement drawings in Volume 3 of the EIAR, the coal holes in this area are to be retained. Chapter 4 (section 4.6.18.1) in Volume 2 of the EIAR states the following in relation to cellars:

“Where cellar and private landings are affected by the Proposed Scheme pre-construction and post construction surveys will be performed by the appointed contractor. It will be determined during the detailed design stage if strengthening works are required to any existing structures.”

5. DCC stated that there is a lack of clarity in the method statement (contained in section 1.2.3.2 of Appendix A16.1-A16.3 in Volume 4 of the EIAR) in relation to the reinstatement of historic paving setts. DCC noted that while in many cases a stretcher bond will represent the traditional bonding arrangement, for the purposes of clarity it is the preference of the Conservation Section that the reinstatement of setts in original locations shall in the first instance reflect the existing historic bonding treatment.

The NTA notes this comment. Section 1.2.3.2 of Appendix A16.1-A16.3 in Volume 4 of the EIAR states the following in relation to the reinstatement of historic paving setts:

“Where the relocation reinstatement of sets or cobbles is necessary they will be reinstated the same location but on the new alignment. The historic layout, bonding pattern and junction details of the retained cobbles or setts or the previously recorded cobbles or setts shall be followed where surfaces are to be re-laid, maintaining the same joint width and pointing detail.”

The NTA believes that the intention of this statement is clear and that where historic paving is reinstated the historic pattern of the paving will be followed.

6. DCC made reference to an earlier comment relating to the relocation of post boxes. The NTA note this comment and a response has been provided earlier in this response document.
7. DCC listed a number of items which have the potential to be impacted on during construction works and will need to be protected during the construction works, namely:

- A lamp standard on the Navan Road comprising an historic cast-iron fluted base (CBC0005LP011) located in front of Belleville and to the east of the Ashtown Roundabout. DCC note that this is considered to be a rare item of street furniture along this stretch of the route and may reflect the reuse of an early vent pipe.

The NTA notes this comment. This Lamp Standard has been considered and assessed within Chapter 16 in Volume 2 of the EIAR, reference CBC0005LP011. Section 1.4 of Appendix A16.3 in Volume 4 of the EIAR sets out the methodology in relation to the protection of historic lamp posts during the Construction Stage as follows:

“The Proposed Scheme engineers have made every effort to retain heritage lamp posts and lamp standards in situ. In most cases, they will not be directly affected by the proposed scheme.

Where they are to be retained in situ, protection during works will be necessary. The use of protective covers, wrappings, or padding, through cordoning off or boxing off as recommended by the Department’s Guidelines (DAHG 2011, 14.4.4). In situ cleaning, repairs and painting will be carried out as necessary.”

- DCC stated that the submitted documentation does not fully represent the total number of c 1930 octagonal concrete electric lamp standards along Old Cabra Road of which there are nine, all bearing a unique identifying number (CBC005LP001). DCC stated that there is the potential for the lamp standards to be impacted during the construction phase of the project.

The NTA notes this comment. The potential indirect impact on lamp posts (i.e., due to the potential for damage to the fabric), was identified in section 16.4.3.6.2 of Chapter 16 in Volume 2 of the EIAR. The magnitude of impact would be Medium. CBC005LP001 lamp posts were assessed as being lamp posts of Low sensitivity.

Taking account of their sensitivity, the potential Construction Phase impact is Negative, Slight and Temporary. The proposed mitigation is the recording, protection and monitoring prior to and during 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 and in accordance with the methodology provided in Appendix A.16.3 in Volume 4 of the EIAR. With mitigation, the magnitude of impact is reduced from Medium to Negligible. The predicted residual Construction Phase impact is Negative, Not Significant and Temporary.

- DCC noted that the relocation of the c.1920 cast-iron lamp standard in the traffic island in front of Nos. 48-49 Manor Street during the works represents a risk of loss or damage to the lamp standard.

The NTA notes this comment. The relocation of this lamp post has been considered and assessed within Chapter 16 (section 16.5.1.5.2) in Volume 2 of the EIAR and states the following:

“The free-standing ornamental lamp post in front of 46-47 Manor Street (CBC0005LP004) will be repositioned within the urban realm improvement scheme. The potential Construction Phase Impact is Negative, Significant and Long-Term. Mitigation measures requires the recording of lampposts in position prior to the construction works, the labelling of the affected fabric prior to its careful removal to safe storage, and reinstatement in new position in close proximity to the original position. Recording is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor. The architectural heritage specialist will oversee the labelling, taking down and reinstatement. The works to the 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. With mitigation, the magnitude of impact is reduced from High to Low. The predicted residual impact is Negative, Slight and Long-Term.”

- DCC noted that section 1.2.4 of Appendix A16.1 refers to a lone single lamp outside No. 39 Stoneybatter, referenced by the applicant as CBC005BTH007, which has not been included in the list of identified lamp posts under table 16.13 of Chapter 16 or plotted on the supporting map sheets. DCC noted that this should be retained in situ during the works.

The NTA notes this comment. CBC005BTH007 will be retained in situ. As with other lamp posts which are being retained in situ along the scheme, it will be recorded, protected and monitored prior to and during 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 and in accordance with the methodology provided in Appendix A.16.3 in Volume 4 of the EIAR.

- DCC refer to two granite jostle stones flanking the vehicular entrance to Pender’s Market at No. 32 Stoneybatter, which they state have not been identified within the EIAR. DCC state that these make a positive contribution to their setting and are considered to be vulnerable to damage from construction activities associated with the proposed works. DCC state that they should be retained in situ during the works.

The NTA note this comment. The jostle stones will not be directly impacted by the Proposed Scheme. As with other historic street furniture, which is being retained in position, the proposed mitigation is the recording, protection and monitoring prior to and during 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 and in accordance with the methodology provided in Appendix A.16.3 in Volume 4 of the EIAR.

8. DCC noted that proposed works to any roads and streets with historic surfaces including paving, setts, setted drainage channels, kerbing and associated features such as original coalhole covers, traditional manhole covers, and stone and cast-iron bollards shall have regard to the provisions of Appendix 7 and Appendix 8 of the Dublin City Council Development Plan 2016-2022.

The NTA note this comment. In preparing the Methodology for Works Affecting Sensitive and Historic Fabric contained Appendix A16.3 in Volume 4 of the EIAR the provisions of Appendix 7 and Appendix 8 of the Dublin City Council Development Plan 2016-2022 were consulted.

Particular regard was paid to the Department of Housing, Local Government and Housing Advice Series on 'Paving: The Conservation of Historic Ground Surfaces' and its sister publications on access, and ironwork in the preparation of the methodology for works affecting items of street furniture and surface treatments.

The methodology has sought, as far as possible, to safeguard surviving items of street furniture within the redline of the proposed scheme.

9. DCC noted that all practicable measures to avoid loss of or damage to historic street surfaces, materials and features shall be taken having regard to section 14.4.4 of the 'Architectural Heritage Protection Guidelines for Planning Authorities (2011)', and to the Department of Housing, local Government and Housing Advice Series on 'Paving: The Conservation of Historic Ground Surfaces' (2015).

In regard to Historic Paving and kerbing, historic street furniture and lamp standards and other features, NTA recognises the importance of protecting historic street surfaces, street furniture and other historical features and note that mitigation measures have been considered in the EIAR, Volume 2 - Main Chapters, Chapter 16 Architectural Heritage Section 16.5 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 2011a) and Paving: the conservation of historic ground surfaces (McLoughlin 2017)*"

Proposed Tree Removal and Provision of New Trees

1. DCC noted that the removal of trees will have a significant impact on the architectural character and setting of historic structures, both protected and unprotected, and streetscapes.

The NTA notes this comment. Significant efforts have been made to minimise tree removal where practicable and responses to DCC's comments on specific locations are outlined below.

2. DCC noted the proposed removal of a number of both mature and young trees along the Navan Road, in particular young trees in the vicinity of St. Vincent's Centre (RPS 5808).

The NTA note this comment. Impacted trees have been presented on the Volume 3 – Figures (Landscaping General Arrangements), and further described in Volume 4 Appendices Part 4 of 4, Appendix A17.1 Arboricultural Impact Assessment. The Proposed Scheme has been specifically designed to retain mature trees where practicable.

Chapter 17 (section 17.4.4.1.4) in Volume 2 of the EIAR, sets out the following in relation to this section of the Proposed Scheme:

"The Operational Phase of the Proposed Scheme involves some considerable changes to the road corridor, most notably where there is permanent land acquisition of private gardens / lands are required along Navan Road. At Construction Phase, trees will be lost and the effect of this will be felt into the Operational Phase.

Some partial replacement / compensatory planting will be provided which reduce effects but will take time to establish, however, for some areas of streetscape there will remain a net loss of trees. While the Proposed Scheme will not alter the existing townscape character beyond the road corridor and immediate surroundings, the Scheme will alter the character of the streetscape along this section of the Proposed Scheme.

There will be notable improvements to the streetscape at Navan Road / Old Cabra Road Junction. The baseline townscape is of medium sensitivity. The magnitude of change in the baseline environment is medium / high.

The potential effect of the Operational Phase is assessed to be Negative, Moderate and Short-Term becoming Slight / Moderate, Long-Term.”

This impact has been considered and assessed and notwithstanding the impacts in this location, the route options assessment undertaken in this location to arrive the Proposed Scheme is robust and delivers the scheme objectives.

3. DCC noted the proposed new trees indicated to the front of the Former City Arms Hotel (RPS 6874) art No. 55 Prussia Street.
4. DCC noted that while the benefits of the introduction of trees within the city is supported in principle, the introduction of trees in this location has the potential to impact on the view of the protected structure from the street. DCC request that the positioning of these trees should be reconsidered.

The NTA notes this comment. The NTA believes that the proposed trees in this location will not significantly detract from the view of the protected structure in this location. The species Amelanchier arborea 'Robin Hill' Shadbush has been proposed in this location. This tree species is a small ornamental tree typically used as a feature accent element on urban squares and parks.

Boundary Treatments

1. DCC noted that where works require removal of existing roadside boundary walls, railings, entrance gates and hedgerows, together with areas of existing garden plantings, garden trees, paving etc, boundary walls, railings, entrance gates and hedgerows to match existing should be reinstated at the setback location, pending agreement on more detailed design with the Planning Authority's Conservation Section and having regard to the provisions of the Architectural Protection Guidelines for Planning Authorities (2011) and the relevant DHLGH Advice Series publications.

The NTA notes this comment. Section 4.6.11.5.3 of Chapter 4 of the EIAR notes the following:

“The Proposed Scheme is bounded by a wide range of established private, institutional, commercial and public land boundaries. While the design development has sought to avoid impacts on such boundaries, the Proposed Scheme will nonetheless require both temporary and permanent access to lands beyond the carriageway boundary. Impacted property boundaries will be reinstated following construction. In some instances, boundaries will be re-built along their original alignments. In other cases, boundaries will be re-built on a new setback alignment. In general, property boundaries will be reinstated on a ‘like for like’ basis, including any walls, piers, fences, railings, gates, driveway finishes and private landscaping. Private grounds that are utilised in part for construction access will be reinstated following completion of the works to match the existing landscaping of the property. Where private grounds are reduced by permanent land take required for the scheme, the remaining grounds will be reinstated to match the landscape and character of the existing grounds in consultation with the property owner.”

Section 13.5 of the Preliminary Design Report of the Supplementary Information notes the following:

“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, unless otherwise noted on the drawings. Final details of boundary walls, gates, driveways and grassed areas where affected, will be agreed between the directly impacted landowners and the NTA. Final details of boundary walls, gates and driveways will be agreed between the affected landowners and NTA during the accommodation works negotiations.”

Proposed boundary modifications have been assessed as part of the Architectural Heritage assessment outlined in Chapter 16 in Volume 2 of the EIAR, with appropriate mitigation measures outlined where necessary.

2. DCC noted that it is suggested that the characterful low railings that bound the traffic islands at the junction of Aughrim Street, Prussia Street and Manor Street might be retained. DCC stated that it is noted from the photomontages that these are to be removed.

The NTA notes this comment. Section 4.5.5.9 of Chapter 4 of Volume 2 of the EIAR notes the following:

“The junction at Aughrim Street will be reduced to a single lane only and the existing public spaces either side of the junction will be extended and further developed to increase the public amenity value of these spaces (see Image 4.4). The existing mature trees will be retained, and the revised layout will facilitate planting of additional new trees and other landscaping.”

Figure 2.9.4 below is Image 4.4 from Chapter 4.



Figure 2.9.4: Image 4.4 Stoneybatter Village.

Section 17.4.1.4. of Chapter 17 of Volume 2 of the EIAR states the following:

“New boundaries will be established on the setback line to match the existing boundary. The construction and provision of the new boundaries will take account of the location of existing trees, other plantings, gradients, drainage, property features and access arrangements so as to minimise additional indirect effects. Where practicable, existing railings, gates, cut stone walls and/or piers (or where appropriate, elements of same) to be removed will be reinstated on the new setback boundary line.”

Cycle Lanes

1. DCC noted that coloured tarmacadam to cycle lanes will alter the physical and visual character of the existing streetscape to include Stoneybatter, lined with Protected Structures; Brunswick Street north, which retains some of the former industrial characteristics of the area; and at the Ashtown Gate entrance to the Phoenix Park.

The NTA note this comment. Section 5.5 of the BusConnects Preliminary Design Guidance Booklet, included in Appendix O of the Preliminary Design Report in the Supplementary Information states the following in relation to the proposed cycle track material:

“As illustrated in Figure 8, the use of machine laid asphalt for the cycle track has proven to be an effective way of providing a high level of service with a safe, smooth and continuous surface. This, however, offers very little contrast to the adjacent carriageway, and depends on the type of edge kerb and the presence of road markings to offer a visual differentiation between the carriageway and the cycle track. Consideration should be given to including an additional colour contrast to the cycle track in the form of an alternative-coloured asphalt (e.g. red, buff, etc) or adding coloured chips to the asphalt surface during installation (e.g. red chip). Designers should refer to section 5.6 of the NCM for further guidance on appropriate cycle track materials.”

At junctions, the chosen cycle track material should be continued (as a surface course layer) through the junction for consistency. Alternatively, coloured epoxy resin (cold-applied anti-skid layer) is a robust alternative measure in terms of longevity and maintenance for making cycle lanes more conspicuous at junctions.”

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

The NTA notes this comment. As outlined above, the use of red coloured asphalt, or red coloured epoxy resin has been specified for all cycle tracks across the BusConnects Infrastructure Works to ensure legibility and conspicuity of the proposed cycle tracks and to ensure safety for vulnerable road users.

New Traffic Semaphore & Signage

1. DCC noted that careful consideration should be given to the siting of associated utilities and traffic management signage in relation to Protected Structures and Conservation Area, historic paving and historic street furniture. DCC noted that signage should be kept to the necessary minimum. DCC’s conservation section recommended that consideration is given to the rationalisation of all signage across the BusConnects routes to reduce visual clutter.

The NTA notes this comment. Significant efforts have been made during the design process to minimise above-ground utility infrastructure where practicable. Where such infrastructure is necessary, it has been sited in appropriate locations, and rationalised where practicable.

The NTA notes the reference to 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.

2.4.10. City Architects Department Comments

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

On page 37 of the DCC submission, the City Architects Department welcomed 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 went on to state that the Proposed Scheme will facilitate the modal shift from car dependency through the provision of walking, cycle, and bus infrastructure enhancements thereby contributing to an efficient, integrated transport system and facilitating a shift to a low carbon and climate resilient City. This Department also noted 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 Proposed Scheme has been developed having regard to relevant accessibility guidance and universal design principles so as to provide access for all users.

The City Architects Department goes on to provide commentary on a number of specific elements, as listed below:

1. Local Public Realm improvement Schemes

DCC noted that the Proposed Scheme includes images of proposed public realm improvements at the following locations:

1. Stoneybatter Village: Junction at Aughrim Street; and
2. George’s Lane.

DCC noted that limited information is provided to facilitate proper assessment of the proposals. In addition, DCC noted that there is potential for the delivery of an enhanced public realm along the length of Manor Street and at Blackhall Street/Place.

The NTA notes this comment. Section 14.5.5.9 of Chapter 4 of Volume 2 of the EIAR outlines detail in relation to the proposed Landscape and Urban Realm Design, including at the specific locations referenced by DCC above (note that for the other geographic sections, similar descriptions are also provided in Chapter 4 of Volume 2 of the EIAR). Reference should also be made to the Landscaping General Arrangement drawings in Volume 3 of the EIAR. In addition, the key landscape measures proposed in each geographic section is set out in Chapter 17 (under Section 17.4) of Volume 2 of the EIAR. The NTA would like to highlight that enhanced public realm is proposed along the length of Manor Street, Blackhall Place and Blackhall Street through the provision of widened footways, high quality concrete paving and enhanced landscaping.

2. Bus Shelter Design

DCC note that bus shelter locations are indicated on drawings but information is not provided on their proposed design, and whether there is sufficient capacity on the footpaths to accommodate them.

The submission goes on to state that in the interest of visual amenity and having regard to protected structures and their settings, advertisements should not be permitted on bus shelters in Architectural Conservation Areas, Red lined conservation areas or special planning control schemes.

The NTA notes these comments. Section 4.14.3 of the Preliminary Design Report, included in the Supplementary Information, outlines the proposals for bus shelters, as follows:

“Bus shelters provide an important function in design of bus stops. The shelter will offer protection for people from poor weather, with lighting to help them feel more secure. Seating will be provided to assist ambulant disabled and older passengers and accompanied with Real Time Passenger Information (RTPI) signage to provide information on the bus services. The locations of the bus shelters are presented on the General Arrangement drawing series in Appendix B.”

Refer also to Chapter 4 in Volume 2 of the EIAR. Section 4.6.4.6 sets out the general policy regarding the provision of bus shelters on the Proposed Scheme.

The optimum configuration that provides maximum comfort and protection from the elements to the travelling public is the 3-Bay Reliance ‘mark’ configuration with full width roof. This shelter is a relatively new arrangement which has been developed by JCDecaux in conjunction with the NTA. The shelter consists mainly of a stainless-steel structure with toughened safety glass and extruded aluminium roof beams. Figure 2.9.5 below provides an example image of the preferred full end panel shelter arrangement. The desirable minimum footpath/island widths required to accommodate the full end panel shelter is 3.3m with an absolute minimum width of 3m to facilitate a minimum 1.2m clearance at the end panel for pedestrians. Alternative arrangements for more constrained footpath widths are considered below.

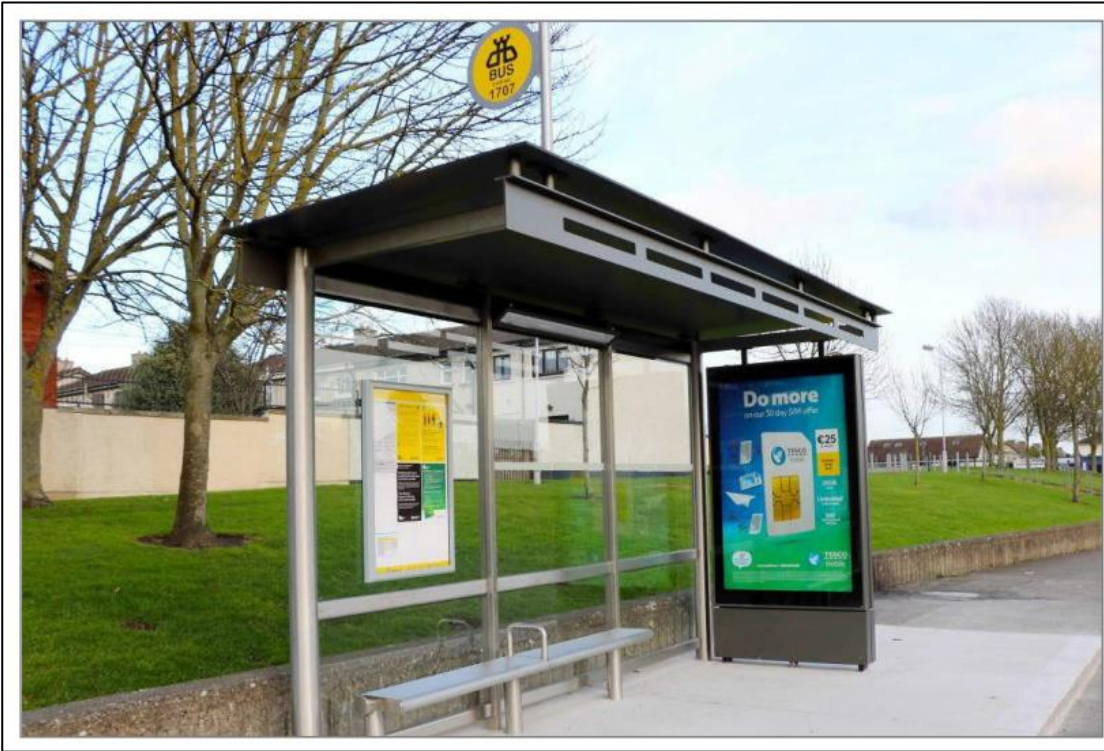


Figure 2.9.5: Standard 3 Bay Reliance Mark Shelter with full width advertising panel

The cantilever shelter using full width roof and half end panel arrangement provides a second alternative solution for bus shelters in constrained footpath locations. Figure 4.11 provides an example of this type of shelter. Advertising panels in this arrangement are normally located on the back façade of the shelter compared to the full end panel arrangement.

The desirable minimum footpath/island widths required to accommodate the full end panel shelter is 2.75m with an absolute minimum width of 2.4m to facilitate a minimum 1.2m clearance at the end panels for pedestrians.



Figure 2.9.6: Example of a 3-Bay Reliance Cantilever Shelter with full width roof and half end panels (source: JC Decaux)

Two alternative narrow roof shelter configurations (figure 4.12) are also available which offer reduced protection against the elements compared to the full width roof arrangements. These shelter configurations are not preferred but do provide an alternative solution for particularly constrained locations where cycle track narrowing to min 1m width has already been considered and 2.4m widths cannot be achieved to facilitate the full width roof with half end panel shelter. The desirable minimum footpath widths for the narrow roof configuration are 2.75m (with end panel) and 2.1m (no end panel). The absolute minimum footpath widths for these shelters are 2.4m (with end panel) and 1.8m (no end panel) to allow for boarding and alighting passengers in consideration of wheelchair, pram, luggage and other such similar spatial requirements.”



Figure 2.9.7: Example of a 3-Bay Reliance Cantilever shelter with a narrow roof configuration with and without half end panels.

The provision of bus shelters in proximity to buildings of architectural significance, has been assessed in EIAR Volume 2, Chapter 16 Architectural Heritage. Section 16.4.4.1 notes the following with respect to protected structures:

“Two locations were identified where the Proposed Scheme will have an indirect visual impact on a Protected Structure during the Operational Phase. These are:

- *St Vincent’s Home, Navan Road (DCC RPS 5808), where kerbs are to be realigned to accommodate a new cycle track, resulting in the loss of existing grass verges and semi-mature roadside trees to the southeast of the existing gate lodge.*
- *A new cantilevered signal is proposed to the northwest of the historic entrance and gate lodge. The existing surfaces, at three of the gates are to be upgraded to stone pavers or setts. The existing northbound bus-stop and shelter will be retained in their current positions. St. Vincent’s Home is of Medium sensitivity. The proposed alterations do not directly impact on any historic fabric. The magnitude of the impact on the setting of the Protected Structure is Low. The potential Operational Phase impact is Negative, Slight and Medium-term.*
- *Everton House, 47 Old Cabra Road (DCC RPS 1088), where an existing bus-stop in front of the historic boundary is to be removed and relocated further to the north and west. Everton House is Medium Sensitivity. The magnitude of impact is Medium. The potential Operational Phase impact on its setting will be Positive, Moderate and Long-term.”*

Section 16.4.4.2 notes the following with respect to Conservation Areas:

“The Prussia Street CA is of Medium sensitivity. The proposed works in the CA are minor, the magnitude of their impact is Negligible. The potential Operational Phase impact on the Prussia Street CA is Neutral, Not significant and Long-term.

The Blackhall Place CA is of High sensitivity. The proposed works in the CA include minor changes to kerb lines and the relocation of one lamp post, to accommodate altered traffic, bus and cycle lanes. The magnitude of impact of the Proposed Scheme on the CA is Low. The potential Operational Phase Impact is Neutral, Slight and Long-term.

The Liffey Quays Conservation Area is of Medium sensitivity. There are no proposed changes within the CA which will impact on features of architectural heritage significance. The potential Operational Phase Impact is Neutral, Imperceptible and Long-term.”

3. Siting of utility cabinets and above-ground utility infrastructure

DCC noted that the siting of utility cabinets, poles and other above-ground utility infrastructure may have significant impacts on the space, visual impact and quality of the public realm.

The NTA note this comment. Significant efforts have been made during the design process to minimise above-ground utility infrastructure where practicable. Where such infrastructure is necessary, it has been sited in appropriate locations, and rationalised where practicable.

4. Palette of Materials

DCC noted that the ‘Typical Material Typologies’ in section 4.6.12.2.1 of Volume 2, Chapter 4 Proposed Scheme Description and the Landscape General Arrangement Drawings, do not appear to include or refer to existing historic fabric such as historic granite paving and historic granite kerbs within the Proposed Scheme.

Heritage features to be retained are noted on the General Arrangement Drawings in Volume 3 of the EIAR, where applicable. The following note is included on drawing sheets where heritage features are to be retained or relocated:

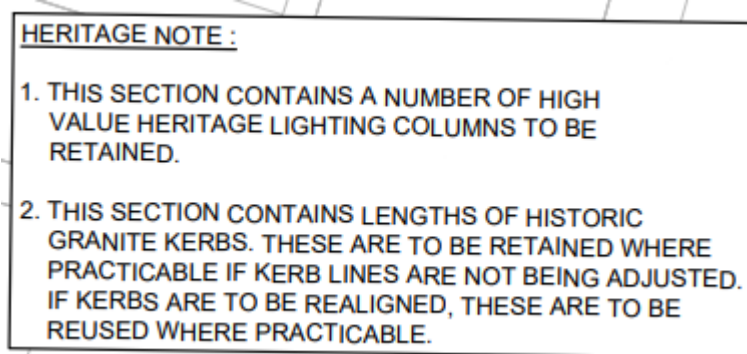


Figure 2.9.8: Heritage Notes

Paving and surface treatments of architectural heritage value were identified at 12 locations as indicated in Chapter 16 (table 16.14) in Volume 2 of the EIAR. Further information is provided in Appendix A16.2 Inventory of Architectural Heritage Sites in Volume 4 of the EIAR.

Proposed mitigation measures for architectural heritage features (including historic paving) are outlined below and detailed in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of the EIAR. The methodology has been prepared in accordance with the Architectural Heritage Protection: Guidelines for Planning Authorities (DAHG 2011a) and Paving: the conservation of historic ground surfaces (McLoughlin 2017).

The Landscaping General Arrangement drawings in Volume 3 of the EIAR includes notes relating to existing stone setts and existing historic granite kerbing and paving.

Section 17.4.1.4.6 of Chapter 17 Landscape and Visual notes the following:

“In addition to the above works, the following specific landscape / townscape and visual measures are included within the Proposed Scheme:

Proposals for the treatment of the urban 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 urban realm and to opportunities for mitigation of impact on the urban 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.”

Section 4.10 of the Preliminary Design Report included in the Supplementary Information notes the following:

“Along certain sections of the route where heritage granite kerbing exists, it is proposed to maximise the retention of the existing kerbing where practicable as the outside edge of the footpath, with proposed cycle track being constructed alongside. This is the case in the Baggot Street and Fitzwilliam Street sections.”

5. Palette of street furniture

DCC noted that a full palette of street furniture is required, and seek confirmation as to whether an identical palette is to be used for the proposed scheme across all local authority areas or whether each local authority, or even each urban village, will have a specific palette. It is further requested that confirmation be provided on whether there will be uniformity in the palette of street furniture across all BusConnects Core Bus Corridor Schemes.

The NTA notes this comment. Section 16.5.1.5 of EIAR Volume 2 Chapter 16 Architectural Heritage includes details of the impacts on existing street furniture of heritage value due to the Proposed Scheme, including post boxes, lamp posts and statuary and other street furniture. 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 including in relation to the final detailing of new street furniture.

6. Boundary Treatments

DCC noted that where property boundaries are to be relocated to facilitate land acquisition, the fabric of existing boundaries should be assessed for their architectural conservation value and cultural value. DCC note that this assessment should consider whether the fabric, which may include railings, walls etc. is suitable for repair and reuse for sustainability reasons in the new boundaries rather than replaced with new.

The NTA note this comment. Section 4.6.18.1 of Chapter 4 of Volume 2 of the EIAR notes the following:

“There are a number of areas along the extents of the route where the Proposed Scheme will result in the requirement for accommodation works and boundary treatments. Specific accommodation works are considered on a case-by-case basis.

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, unless a section of street can benefit from urban improvement appropriate to the area.”

Section 13.5 of the Preliminary Design Report notes the following:

“Final details of boundary walls, gates, driveways and grassed areas where affected, will be agreed between the directly impacted landowners and the NTA. Final details of boundary walls, gates and driveways will be agreed between the affected landowners and NTA during the accommodation works negotiations.”

As stated in Chapter 16 (section 16.1) in Volume 2 of the EIAR, the impacts on boundary treatments have been assessed as part of the Architectural Heritage assessment, with appropriate mitigation measures outlined where necessary.

7. Integration of the materials palette of the proposed scheme with existing private landing areas and recently upgraded areas of the public footpath

DCC noted that a strategy for the resurfacing of private landings should be developed (with the owners consent) and the retention/replacement of newly resurfaced areas of public footpath should be devised so a consistent paving palette is used throughout the Proposed Scheme.

The NTA notes this comment. In relation to Private Landings, these have not been included within the Proposed Scheme red line boundary unless necessary to deliver the Proposed Scheme.

If these private landings were to be resurfaced, it would require significant additional compulsory land acquisition to deliver, which would not align with the ethos of this scheme to minimise compulsory land acquisition.

Sections 4.6.11.1 and 4.6.11.2 of Chapter 4 of Volume 2 of the EIAR note the following:

“The landscape and urban realm proposals are derived from analysis of the existing urban realm, including existing street and public space character, heritage features, boundaries, tree planting and vegetation, and the range of contemporary and heritage materials in use that inform the quality and character of different parts of the overall route.

The analysis identified the range of character areas along different parts of the route informed by adjacent land uses fronting onto the route; the character and heritage of buildings including any protected structures and private gardens or grounds; the nature and presentation of any boundary walls, railings or hedgerows; existing street trees or vegetation and the nature and quality of streetscape materials.

This analysis provided an understanding of the existing character areas along the route and facilitated detailed and iterative consideration as to the integration of the Proposed Scheme. This analysis informed design changes to the initial proposals so as to avoid adverse impacts of existing streetscape character, and also identified opportunities for enhancement and creation of new spaces along the route. Character analysis also informed the development of mitigation proposals where public or private property would be directly impacted by the Proposed Scheme.

Throughout the design process, a palette of materials has been developed to create a consistent yet locally relevant design response appropriate to different locations along the route. The proposed materials are based on the existing materials and treatments along various parts of the route to match existing material treatments, while also identifying areas of opportunity for enhancement through the use of higher quality materials. Material palettes are described by reference to different typologies appropriate to different sections of the route.”

There is a range of material typologies listed in section 4.6.11.2 of Chapter 4, which includes the following:

“No change - At some locations, the proposed scheme does not necessitate any alteration to the alignment of the existing footpath or roadway. These include established and more recently constructed sections of streetscape.”

8. Village Signage

DCC noted that existing ‘Welcome to Village xxx’ signage should be retained, in agreement with the local authority and community

It is the intention of the Proposed Scheme to retain all such signage.

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.

City Arts Officer Comments

The NTA notes the comments of the City Arts officer in relation to their request to apply for the Per Cent Art scheme as part of the development of the Proposed Scheme. NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC City Arts Officers comments. NTA will however continue the very positive and constructive liaison with DCC throughout the procurement and construction process.

2.5. Conclusion

C5 - Response to section 2.5

DCC is supportive of the Proposed Scheme and stated in their conclusion on page 40 of the submission:

“The proposed Blanchardstown 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 confirmed (at page 40 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 acknowledged that these improvements will make it easier for people to access and use public transport. It also acknowledged 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:

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:

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.

NTA response:

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, these are matters that 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:

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.

NTA response:

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. 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:

All relevant DCC departments involved with the development of the Scheme shall be consulted during the detailed design development process for the Scheme and the NTA shall incorporate the requirements of the DCC departments into the final detailed design of the Scheme.

NTA response:

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 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. These are matters that can be successfully addressed between DCC and the NTA, in the absence of any approval condition.

Traffic Division

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

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 Roads Division inputs as these matters were the subject of extensive liaison throughout the design development process.

Public Lighting Department

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

Chapter 7 (Air Quality) and Chapter 9 (Noise and Vibration) in Volume 2 of the EIAR, both contain an assessment of the potential air and noise impacts which could arise from the construction of the Proposed Scheme (the construction strategy is set out in Chapter 5 in Volume 2 of the EIAR). Chapters 7 and 9 also contain comprehensive suite of measures to mitigate the potential air and noise impacts which could arise from the construction of the Proposed Scheme. These mitigation measures broadly align with the ‘good practice’ measures set out in the DCC Air Quality Monitoring and Noise Control Unit’s Good Practice Guide for Construction and Demolition. These mitigation measures are also contained within the Construction Environmental Management Plan in Appendix A5.1 in Volume 4 of the EIAR.

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. With regard to the depositing of an archaeological paper archive, the NTA will be happy to liaise with DCC at the appropriate time with regard to fulfilling this recommendation.

Conservation Department

In regard to the recommended measures relating to Conservation Issues in the Appendix, 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.

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 section 16.2.4 of 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 of Chapter 16 in Volume 2 of the EIAR.
- The requirement of the appointed contractor relating to the Architectural Heritage is outlined in section 16.5 of Chapter 16 in Volume 2 of the EIAR.

City Architects Department

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.

2.9.4 Dublin Commuter Coalition

2.9.4.1 Overview of the submission

The submission raised the following issues:

1. Advocate for the Proposed Scheme
2. Enforcement
3. Junction Design
4. Pedestrian Crossings
5. Shared Space
6. Bus Stop Design
7. Blanchardstown to M50 Junction
8. Navan Road (M50 junction to Old Cabra Road junction)
9. Old Cabra Road Junction to Quays

2.9.4.2 Advocate for the Proposed Scheme

Summary of issue

The submission set 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 noted that the Dublin Commuter Coalition support the Proposed Scheme and are glad to see that more than three years of public engagement has resulted in a planning application.

They believe the project will be a catalyst for greater usage of public transport and active travel. However, they stated that the proposed design requires significant changes for this to happen and requested an oral hearing to discuss the changes.

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 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.

2.9.4.3 Enforcement

Summary of issue

The submission outlined its views in relation to the importance of enforcement for lawful use of bus lanes, cycle lanes and other measures such that the benefits of the Proposed Scheme will be realised by bus 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.

2.9.4.4 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. The submission requested that Dutch-style junctions be used throughout the Proposed Scheme. The submission also noted that there are several junctions that do not align with the general direction of DMURS to minimise corner radii.

Response to issue

Principles of Protected Junction Design for BusConnects

The NTA wishes to clarify that the following terms ‘Dublin-style’ junction, ‘Dutch-style’ junction and ‘CYCLOPS’ junction does 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 four types of junctions 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 4.5, table 4.10, table 4.15, table 4.20 and table 4.26 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 5.1 and 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 'Ontwerpwijzer 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 2.9.9, 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:

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

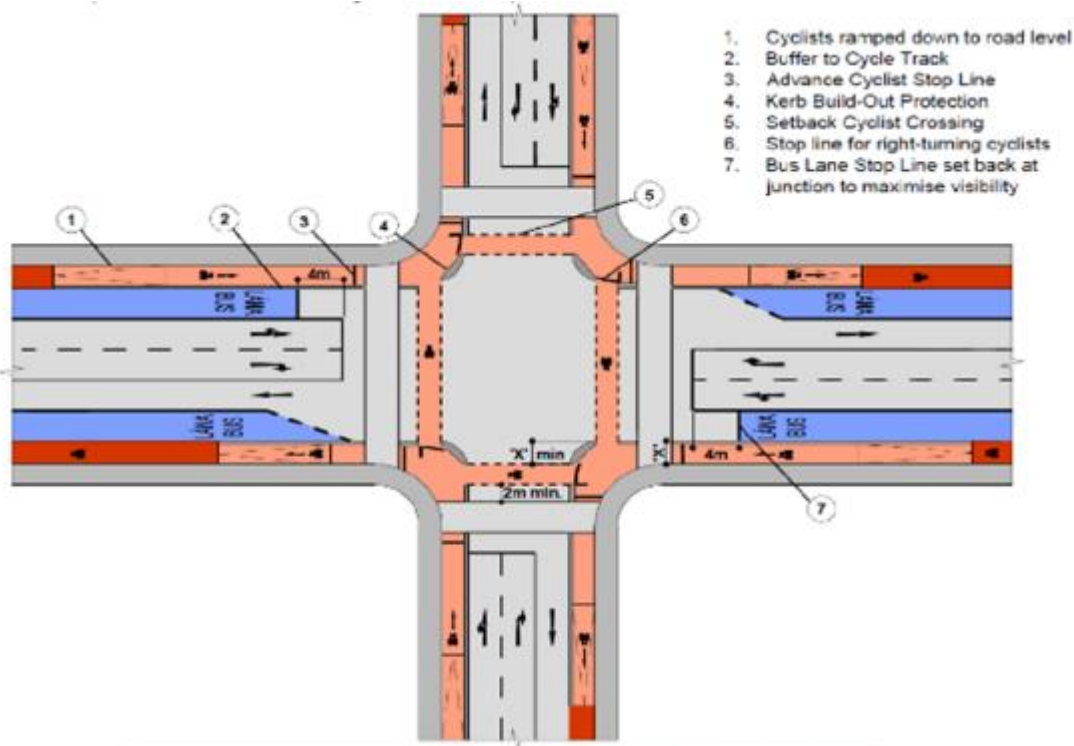


Figure 2.9.9: Typical Junction Layout from BusConnects Preliminary Design Guidance Booklet

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 of 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 the 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, following the hierarchy of road users set out in DMURS which places pedestrians at the top of the hierarchy.

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 requires a multi-movement, sometimes multi-directional, non-continuous crossing for pedestrians, 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.

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 2.9.10 below).



Figure 2.9.10: Example from the Netherlands of traffic signals + give way signage controlling turning traffic and cyclists (Source: Dutch Design Guide Ontwerpwijzer Fietsverkeer)

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 cyclists in such locations.

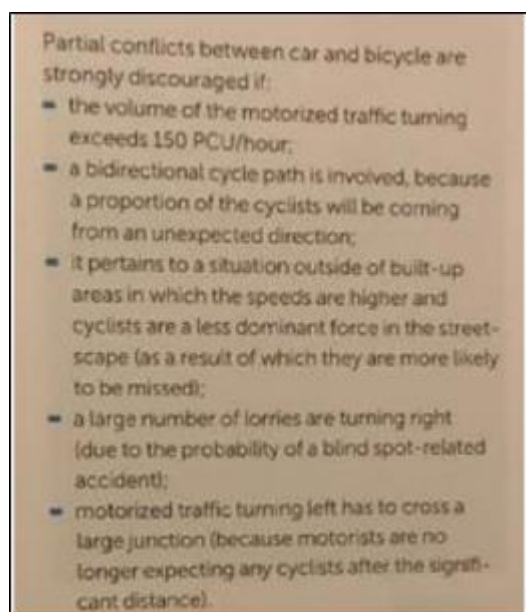


Figure 2.9.11: Extract from Dutch Design Guide Ontwerpwijzer Fietsverkeer

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 *Ontwerpwijzer Fietsverkeer* discourages partial conflicts between cyclists and vehicles if the volume of turning vehicular traffic exceeds 150 PCU's per hour. See the above extract from *Ontwerpwijzer Fietsverkeer* which identifies the above threshold.

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.

12 of the 39 key junctions on the Proposed Scheme have implemented this approach, of left-turning vehicles giving way to cyclists, 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 vehicles turning left. At each of these junctions the left turning vehicle traffic volumes in these locations are estimated to be less than the 150 PCU 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 12 junctions, 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. It is noted that these rules are also applicable within DLRCC.

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.

Junction Corner Radii

Junction corner radii have been designed in line with the principles of DMURS.

As noted in section 4.9 of the Preliminary Design Report:

Generally, on junctions along the Proposed Scheme, corner radii of between 6m and 10m will be implemented. This will generally accommodate the swept-path of the design vehicles along the route without the swept-path crossing the centre line of the intersecting road. However, where swept-path analysis has identified constrained areas and larger vehicles are anticipated to make up a higher portion of the usage (i.e. bus lanes, HGV service areas etc.) a combination of localised carriageway widening, and increased corner radii has been provided to facilitate this.

Although swept-path analysis is used to inform the junction design, it is not the determining factor. There are a number of additional factors relating to the junction design which are considered in the overall methodology including junction intervisibility, speed of turning vehicles and in particular pedestrian safety. Corner radii along the route will be less than 6m at some locations in order to lower the speed at which vehicles can turn corners and increase inter-visibility between users e.g. Fingal Place (see DMURS section 4.3).

Reduced corner radii will also assist in the creation of more compact junctions, which align crossing points with desire lines and reduce crossing distances. It is accepted that at minor type junctions and residential accesses, larger vehicles may have to cross the centreline; however, usage is expected to be infrequent.

Specific concerns were then raised on the following junctions throughout the Proposed Scheme.

Blanchardstown Road North / Old Navan Road Junction

Summary of issue

The submission stated that two-stage pedestrian crossings should be avoided, by installing pedestrian islands between the cycle lanes and the carriageway, which would reduce distance for pedestrians to cross. Another possibility would be to remove the pedestrian islands to reduce distance needed for pedestrians to cross.

In addition, the submission noted that there is no pedestrian crossing on the southern side of the junction, resulting in pedestrians needing to use three other crossings, meaning six possible traffic light changes.

They noted that the cyclist starting point is beside the vehicle starting point, which will lead to conflict between cyclists going straight ahead and motorists turning left, leading to possible collisions and fatalities.

They proposed the waiting point for cyclists should be ahead of that for motorists, to allow left turning motorists to view cyclists going straight ahead, in advance of the vehicle turning left.

Additionally, it is proposed that an early green light is given to cyclists.

Response to issue

Refer to section 2.9.4.4 which provides a response on the junction design type including use of a pedestrian waiting area between a cycle lane and carriageway.

As noted in section 5.7 of Appendix A4.1 PDGB of the EIAR:

“Where a refuge island is provided, straight crossings are desirable and the refuge island should be 4m wide or more. At a staggered crossing, islands of less than 4m in width may be provided, and these should have a minimum effective width of 2m between obstacles such as signal poles.”

It is not practicable to provide refuge islands of 4m wide or more at this junction, and hence staggered crossings have been utilised (as per existing junction).

A pedestrian crossing is not proposed at southern end of Blanchardstown Road North / Old Navan Road junction at Chainage B790 as a footpath is not proposed along the southern side of Old Navan Road to south of this junction, which will match the existing situation. A pedestrian crossing of Blanchardstown Road South is however available at chainage B650, which is deemed adequate.

Refer to section 2.9.4.4 above for a response to the issue of a conflict between cyclists proceeding straight ahead and left turning vehicles.



Figure 2.9.12: Blanchardstown Road North / Old Navan Road Junction

Blanchardstown Road South / N3 off-slip Junction

Summary of issue

The submission stated that the proposed junction is poor with a complicated cycle crossing and excessive shared cyclist / pedestrian space.

Response to issue

Refer to section 2.9.4.6 for the response with respect to the use of shared space.

Also, as noted in section 4.13 of the Preliminary Design Report:

“Pedestrians will share their movements with cyclists when using toucan crossings, which will be provided at signalised junctions which cannot accommodate segregated cycle crossings.”

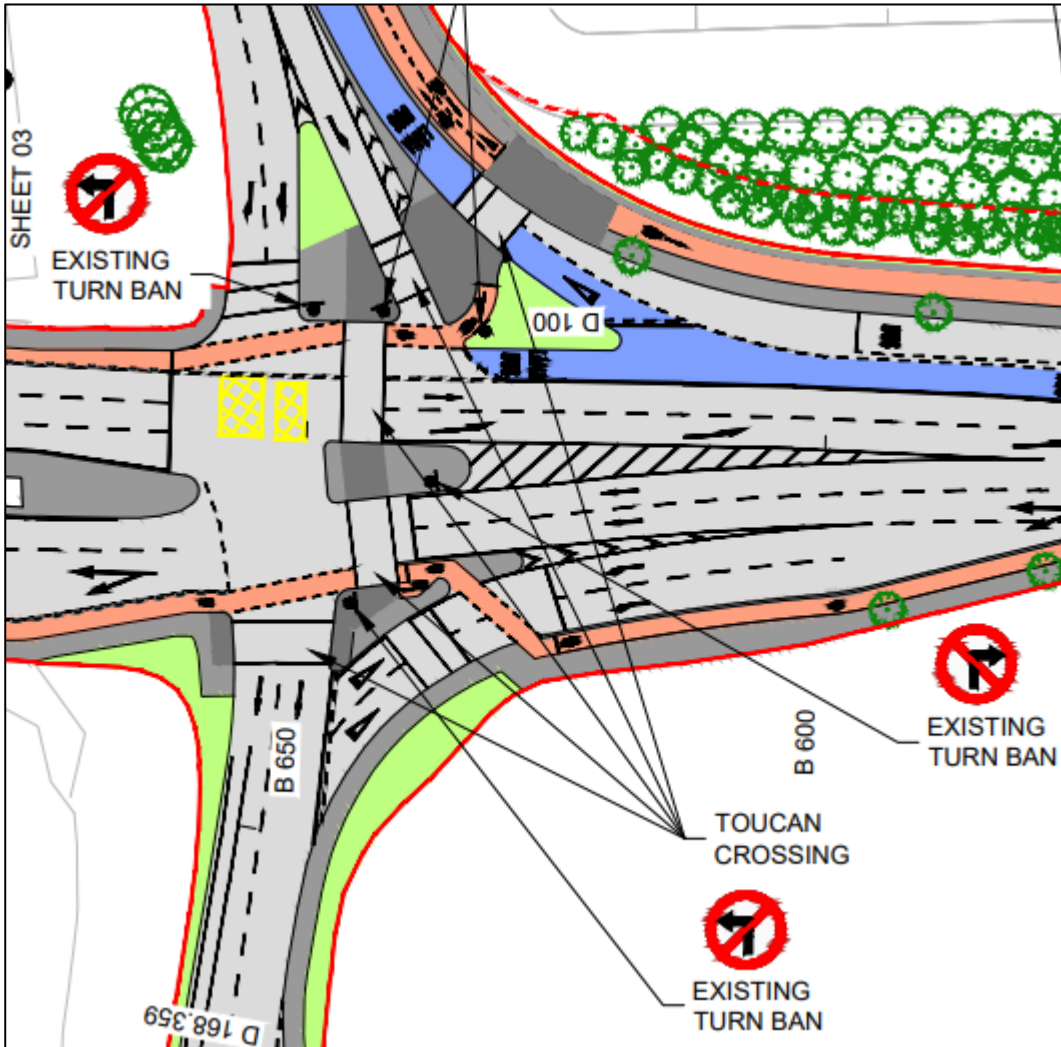


Figure 2.9.13: Blanchardstown Road South / N3 off-slip Junction

Blanchardstown Road South / Blakestown Way Junction

Summary of issue

The submission noted that pedestrian islands should be created between the cycle lane and carriageway with cyclist waiting points moved ahead of vehicle waiting points, with appropriate changes made to signalling.

They noted that there is conflict with pedestrians in shared space, and small islands protruding into cycle lanes at the corners of the junction.

Response to issue

Refer to section 2.9.4.4 which provides a response on the junction design type including use of pedestrian waiting area between a cycle lane and carriageway.

Refer to section 2.9.4.4 for a response to the issue of a conflict between cyclists proceeding straight ahead and left turning vehicles.

Refer to section 2.9.4.6 for the response with respect to the use of shared space.

The width of cycle lanes in the vicinity of kerbed islands is consistent with the cycle lane width on approach.

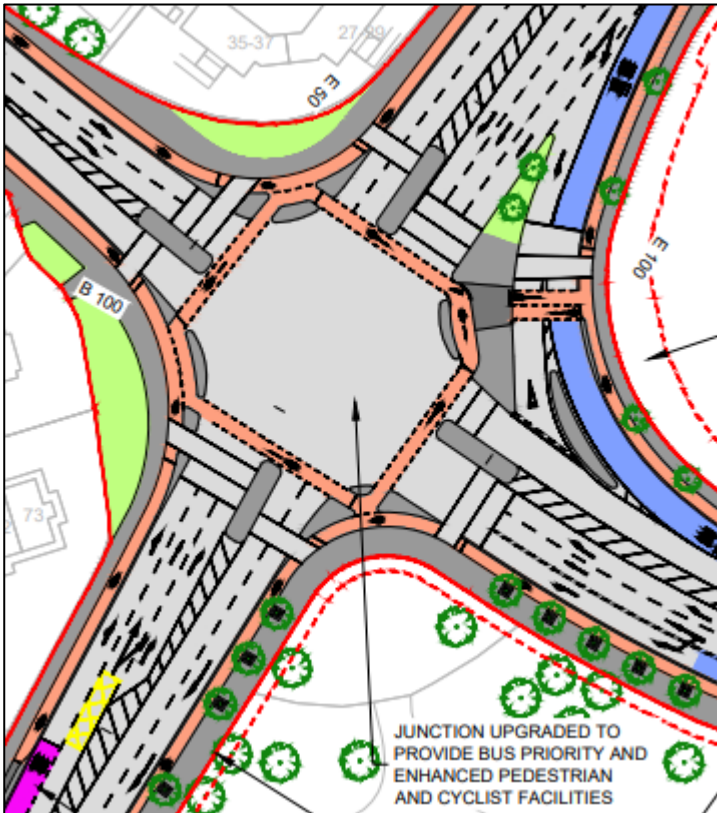


Figure 2.9.14: Blanchardstown Road South / Blakestown Way Junction

Bus Interchange Western Access

Summary of issue

It is stated that the changes proposed to the Bus Interchange in this submission would simplify the poorly designed Western access junction, as there is a missing cycle lane connection across the junction, requiring cyclists to dismount and use the footpaths.

Response to issue

Access for cyclists across the junction will be facilitated by the use of toucan crossings.

As noted in section 4.13 of the Preliminary Design Report:

“Pedestrians will share their movements with cyclists when using toucan crossings, which will be provided at signalised junctions which cannot accommodate segregated cycle crossings.”

A toucan crossing will facilitate movement adequately and safely and is preferred to provide a balanced solution to cater for pedestrians and cycle users. Shared use of space between pedestrians and cyclists is included which reflects the need to cater for a range of movements at this location. Provision of signage and road markings will encourage cyclists to carefully negotiate these areas such that safety of pedestrians is not compromised.

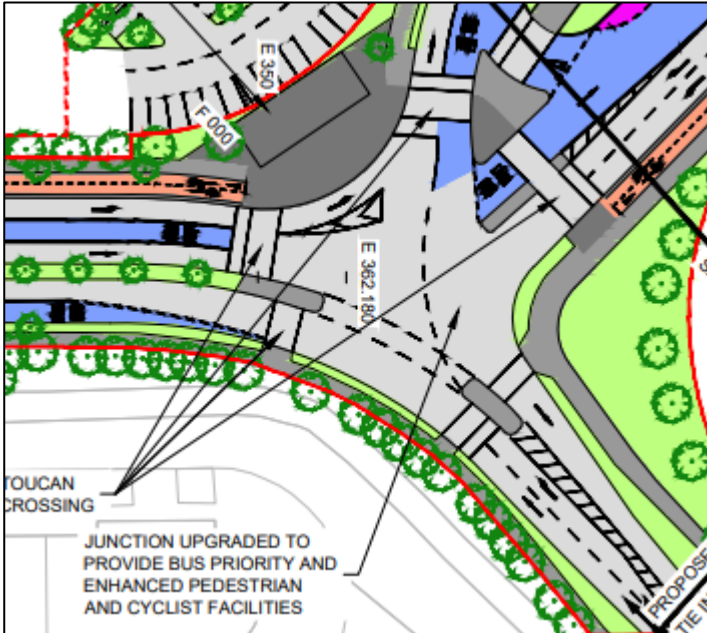


Figure 2.9.15: Bus Interchange Western Access

Crowne Plaza Junction

Summary of issue

The submission stated that the shared space at the junction should be replaced with segregated cycle lanes and pedestrian islands between the cycle lane and the carriageway.

Response to issue

Refer to section 2.9.4.6 for the response with respect to the use of shared space.

Refer to section 2.9.4.4 which provides a response on the junction design type including use of pedestrian waiting area between a cycle lane and carriageway.

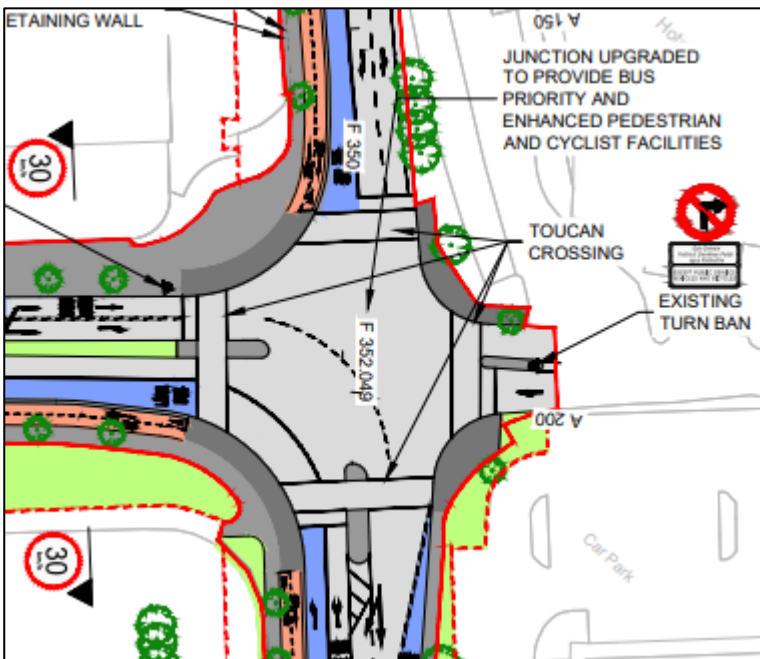


Figure 2.9.16: Crowne Plaza Junction

L3020 / Liberty Insurance Junction

Summary of issue

The submission welcomed amending the roundabout to a signalised junction but stated that the shared space should be replaced with segregated cycle lanes and pedestrian islands between the cycle lanes and the carriageway.

Response to issue

Refer to section 2.9.4.6 for the response with respect to the use of shared space.

Refer to section 2.9.4.4 which provides a response on the junction design type including use of pedestrian waiting area between a cycle lane and carriageway.

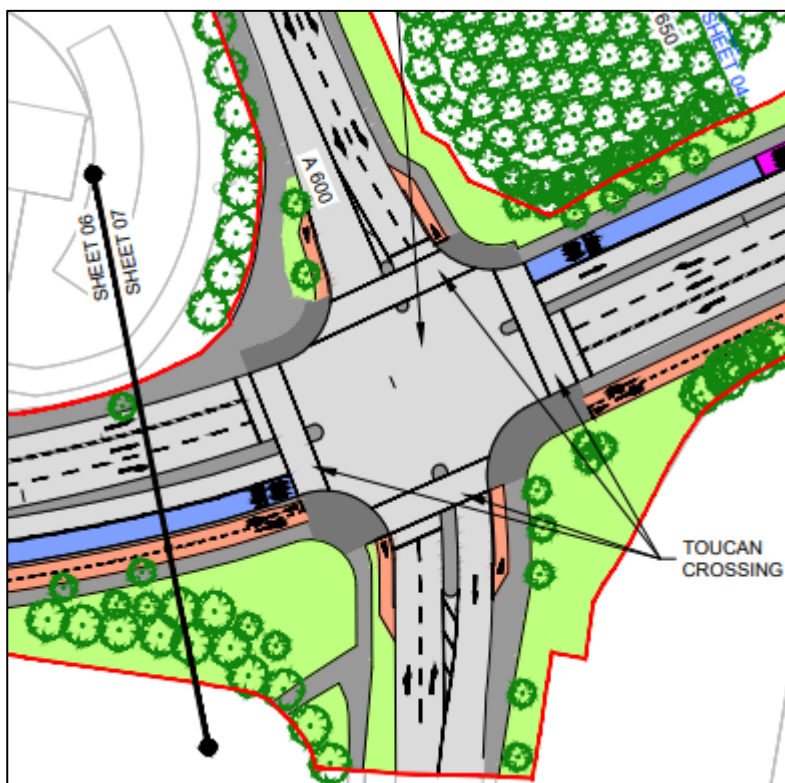


Figure 2.9.17: L3020 / Liberty Insurance Junction

Auburn Avenue / Castleknock Manor Junction

Summary of issue

The submission stated that where the cycle track merges with the carriageway to the north of the junction will lead to conflict with vehicles. It also noted that the use of shared space crossings is unnecessary and dangerous, leading to pedestrian/cyclist conflicts.

It also stated that it is unclear what measures will be taken to ensure Castleknock Manor is a 'Quiet Street' and no conflict between vehicles and cyclists.

Response to issue

As noted in section 4.5.3.1 of Chapter 4 of Volume 2 of the EIAR:

"The Proposed Scheme will provide Quiet Street Treatment for cyclists on Castleknock Manor to integrate with secondary route 4A of the Greater Dublin Area (GDA) Cycle Network Plan. The Auburn Avenue / Castleknock Manor roundabout will be modified to provide enhanced pedestrian and cyclist crossing facilities."

Cyclists travelling northbound towards Navan Road will yield before joining the carriageway.

The existing roundabout layout has cyclists sharing the roundabout with vehicles.



Figure 2.9.18: Existing layout of Auburn Avenue / Castleknock Manor Roundabout (@Google)

As noted in the National Cycle Manual: Cycle lanes should not be included in the circulating section of roundabouts.

The proposed layout removes cyclists from the roundabout and will minimise impact on green space and trees.

It is noted that a Stage 1 Road Safety Audit has been carried out on the design and no comments were raised by the Auditor with respect to this proposed design.

As noted in section 4.12.3 of the Preliminary Design Report:

“Offline options may include directing cyclists along streets with minimal general traffic other than car users who live on the street. They are called Quiet Streets due to the low volume of general traffic and are deemed suitable for cyclists sharing the roadway with the general traffic without the need to construct segregated cycle tracks or painted cycle lanes. The Quiet Street Treatment would involve appropriate advisory signage for both the general road users and cyclists. A quiet street cycle route is proposed along Castleknock Manor which connects to the two-way cycle track on the R147 Navan Road. This links directly with the GDA Cycle Network Plan Secondary Route 4A.”



Figure 2.9.19: Auburn Avenue / Castleknock Manor Junction

R147 Navan Road / Parkway Bridge Junctions

Summary of issue

The submission noted that with the development of DART+, this station will become an important DART station. However, it noted that the proposed design for pedestrian and cyclist infrastructure at the bridge and into the railway station is poor and will likely lead to conflicts between pedestrians and cyclists.

It is stated that the sharp curves at each end of the bridge are unsafe and unlikely to be observed.

The submission stated that the junction type should be changed to bring into line with best practice, including removal or reduction in shared space and segregated cycle lanes should extend through the junction, with cyclists waiting points ahead of vehicles at the junctions.

Response to issue

As shown on the General Arrangement drawings in Volume 3 of the EIAR, the existing three lanes of traffic across the bridge is being retained along with the existing cycle tracks which are located at footpath level, to minimise impact on the bridge.

Refer to section 2.9.4.6 for the response with respect to the use of shared space.

Refer to section 2.9.4.4 which provides a response on the junction design type including use of pedestrian waiting area between a cycle lane and carriageway.

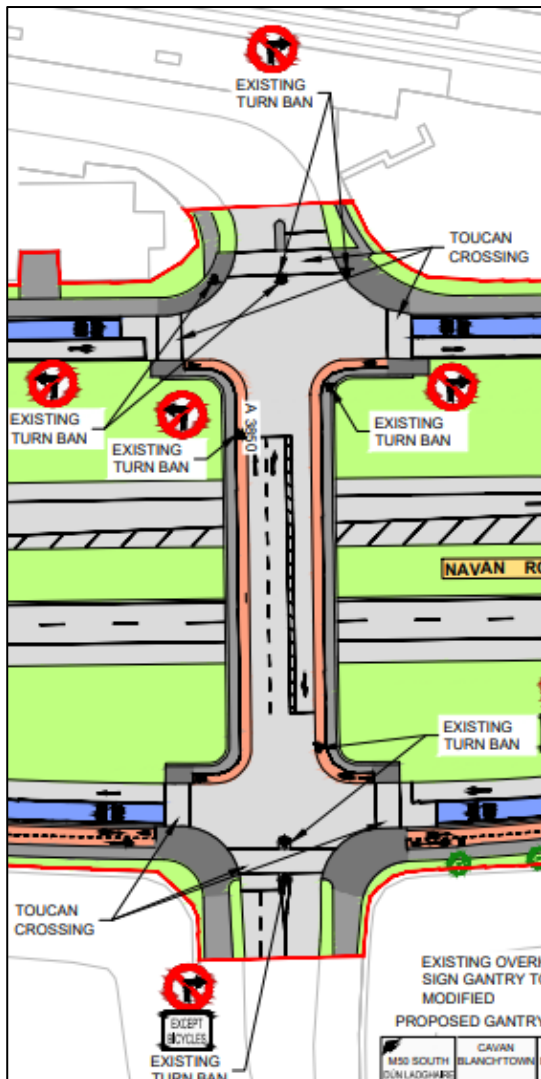


Figure 2.9.20: R147 Navan Road / Parkway Bridge Junctions

Navan Road / Phoenix Park Avenue Junction

Summary of issue

The submission stated that the shared space should be removed to segregate pedestrians and cyclists. It also recommended that a pedestrian island be located between the cycle lane and carriageway at the toucan crossing, noting that pedestrians would have to wait in a cycle lane in the proposed design.

Response to issue

Refer to section 2.9.4.6 for the response with respect to the use of shared space.

Refer to section 2.9.4.4 which provides a response on the junction design type including use of pedestrian waiting area between a cycle lane and carriageway.

At the proposed toucan crossing, pedestrians will be waiting at a pedestrian priority zone and not in a cycle lane.

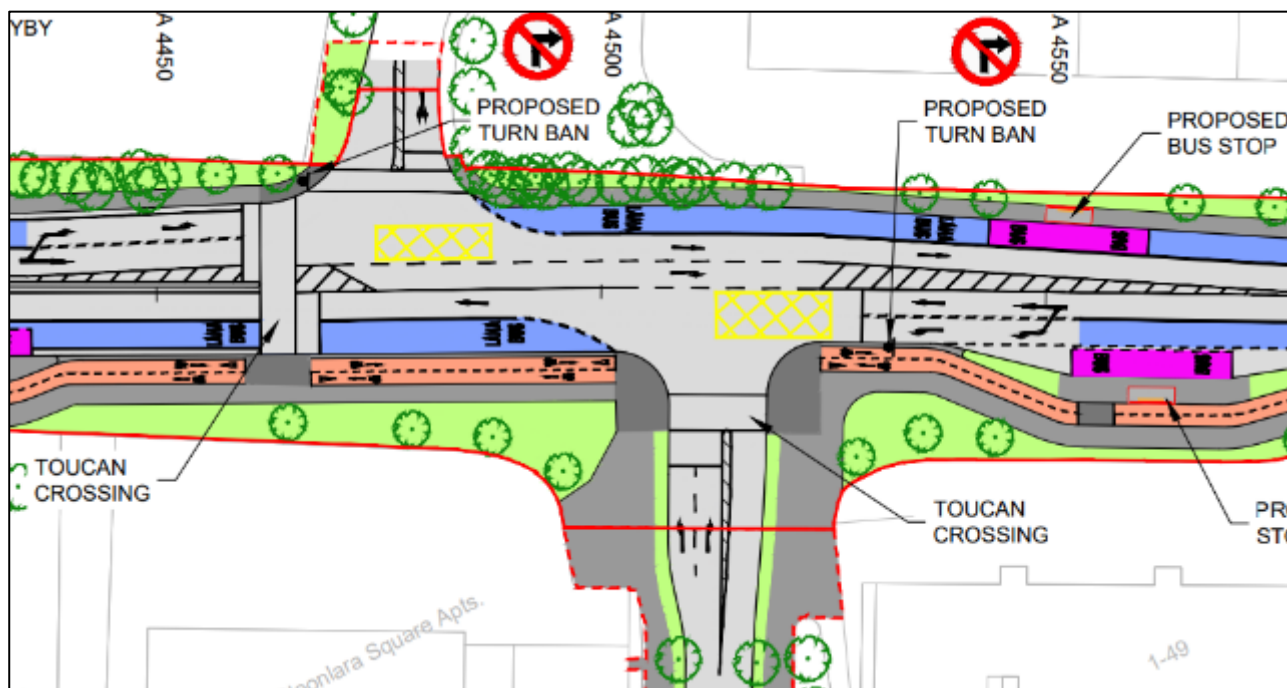


Figure 2.9.21: Navan Road / Phoenix Park Avenue Junction

Navan Road / Ashtown Road Junction

Summary of issue

The submission noted that the proposed 'Dublin style' junction should be replaced with a 'Dutch style junction', by removing the shared space and replacing it with a pedestrian island between the cycle track and the carriageway. It also recommended that the cyclist waiting point be moved ahead of the vehicle stop line with appropriate changes to traffic signalling to reduce conflict between cyclists and vehicles.

Response to issue

Refer to section 2.9.4.6 for the response with respect to the use of shared space.

Refer to section 2.9.4.4 which provides a response on the junction design type including use of pedestrian waiting area between a cycle lane and carriageway.

Refer to section 2.9.4.4 for a response to the issue of a conflict between cyclists proceeding straight ahead and left turning vehicles.



Figure 2.9.22: Navan Road / Ashtown Road Junction

Navan Road / Kempton Avenue Junction

Summary of issue

The submission stated that pedestrian islands should be introduced between the cycle lane and the carriageway.

Response to issue

Refer to section 2.9.4.4 which provides a response on the junction design type including use of pedestrian waiting area between a cycle lane and carriageway.



Figure 2.9.23: Navan Road / Kempton Avenue Road Junction

Junction of Navan Road with Ashtown Grove, Kinvara Avenue/Baggot Road, Nephin Road, Skreen Road, Hampton Green and Cabra Library

Summary of issue

The submission stated that pedestrian islands should be created between the cycle lane and the carriageway and cyclist stop lines moved ahead of vehicle stop lines with associated changes to traffic signalling to reduce conflict with motorists.

Response to issue

Refer to section 2.9.4.4 which provides a response on the junction design type including use of pedestrian waiting area between a cycle lane and carriageway.

Refer to section 2.9.4.4 for a response to the issue of a conflict between cyclists proceeding straight ahead and left turning vehicles.

Mainline buses and cyclists will operate within the same stage through the junction at Nephin Road and Skreen Road junctions.

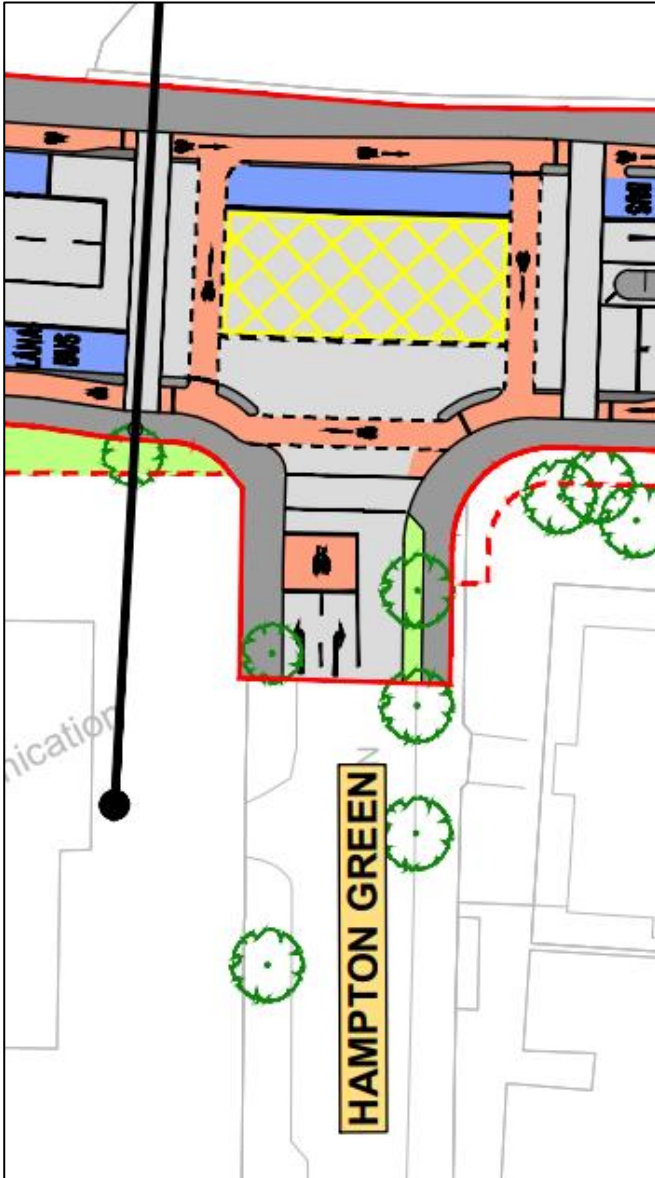


Figure 2.9.24: Navan Road / Hampton Green Junction

Navan Road / Old Cabra Road Junction

Summary of issue

The submission stated there is no proper provision for cyclists proceeding straight ahead from Navan Road onto Cabra Road, with excessive use of shared space.

Response to issue

There are currently no crossing facilities through the junction for cyclists proceeding onto the Cabra Road from Navan Road.

A toucan crossing is proposed across Ratoath Road where the use of a protected junction is not practicable due to the need to facilitate two-way cycle lane crossing between Navan Road and Old Cabra Road. A toucan crossing will facilitate movement adequately and safely and is preferred to provide a balanced solution to cater for pedestrians and cycle users.

Refer to section 2.9.4.6 for the response with respect to the use of shared space.

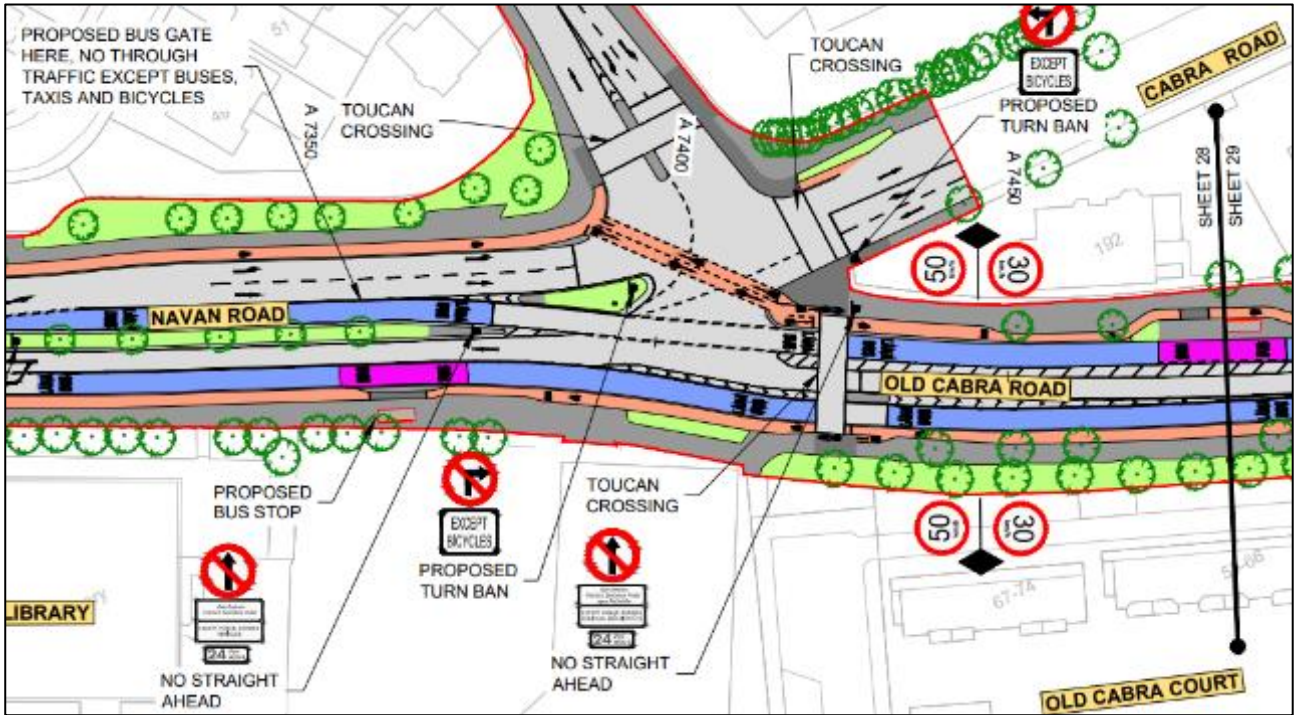


Figure 2.9.25: Navan Road / Old Cabra Road Junction

Old Cabra Road / Glenbeigh Road Junction, Prussia Street / North Circular Road Junction and Manor Street / Kirwan Street Junction

Summary of issue

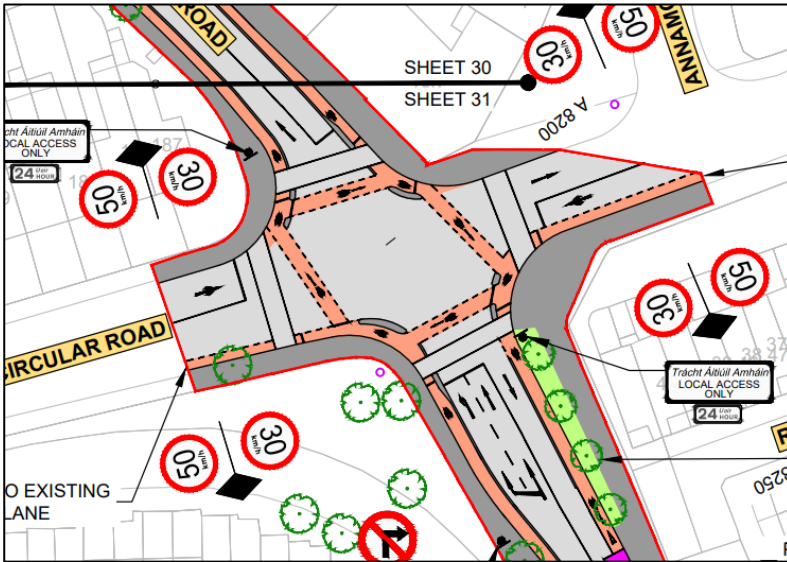
The submission stated that pedestrian islands should be created between the cycle lane and the carriageway and cyclist stop lines moved ahead of vehicle stop lines with associated changes to traffic signalling to reduce conflict with motorists.

Response to issue

Refer to section 2.9.4.4 which provides a response on the junction design type including use of pedestrian waiting area between a cycle lane and carriageway.

Refer to section 2.9.4.4 for a response to the issue of a conflict between cyclists proceeding straight ahead and left turning vehicles.

Toucan crossings operate within their own phase at Glenbeigh Road junction. There will be no access to Kirwan Street or Manor Place from Manor Street for vehicles, thus no conflict with cyclists proceeding along Manor Street.



**Figure 2.9.26: Prussia Street / North Circular Road Junction
Stoneybatter / King Street North Junction**

Summary of issue

The submission stated that the proposed shared space at the junction should be removed as it creates conflict between cyclists and pedestrians, results in the waiting point for cyclists being behind the vehicle stop line, and it coincides with the outdoor smoking area for Walsh’s Pub.

Response to issue

A pedestrian priority zone is proposed on the southern side of Brunswick Street North at the junction with Stoneybatter with cyclists yielding on approach, as there is insufficient width to accommodate a segregated cycle track. Cyclists will wait at the edge of footpath, which is ahead of the carriageway stop line, before proceeding northbound along the cycle lane.

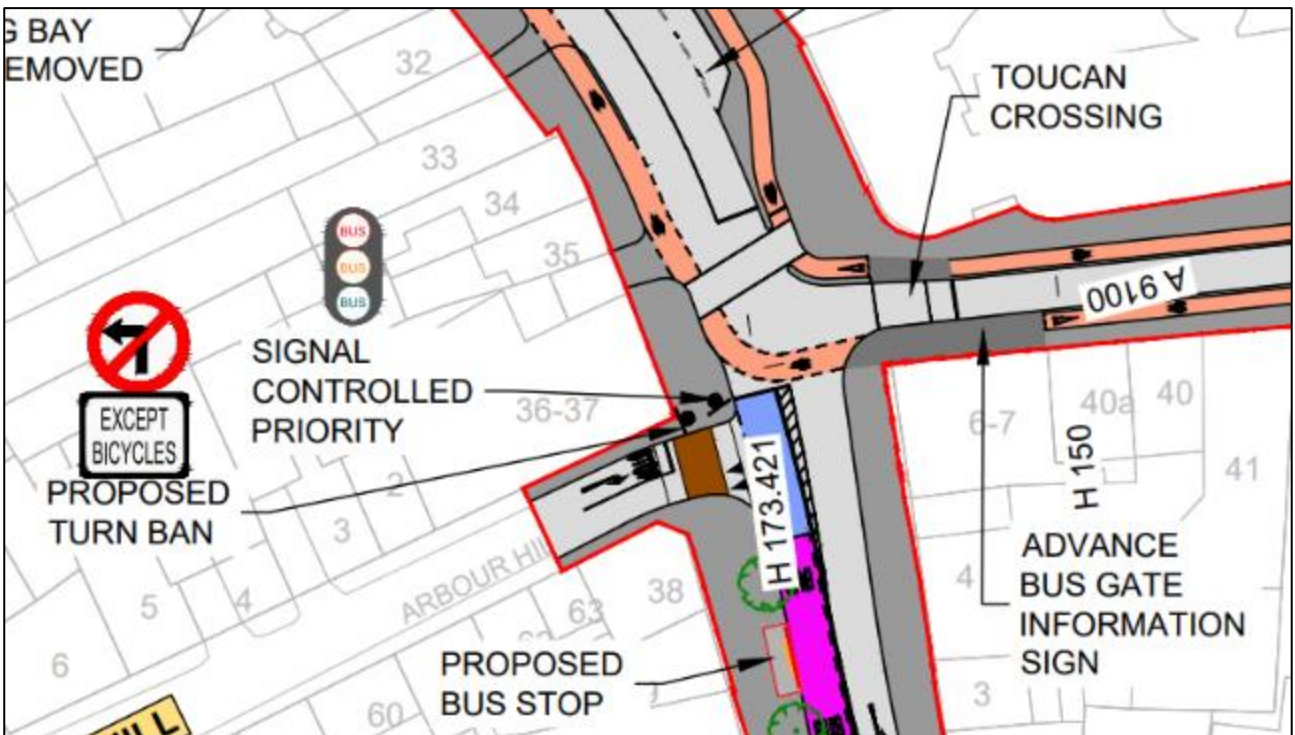


Figure 2.9.27: Stoneybatter / Brunswick Street North Junction

2.9.4.5 Pedestrian Crossings

Summary of issue

The submission queried the design rationale for providing two stage crossings as part of the Proposed Scheme, noting they are inconsistent with DMURS and drastically increase the time taken for pedestrians to navigate crossings and junctions. The submission also noted some junctions are missing pedestrian crossings at one or more arms.

Response to issue

The NTA acknowledges the comments raised in the submission and note that the Proposed Scheme will increase the number of controlled pedestrian crossings from 77 in the existing to 125 in the Proposed Scheme, equating to a 62% increase. Additionally, there will be an increase in the number of raised table crossings on side roads from 6 in the existing to 32 in the Proposed Scheme, equating to a 433% 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.

As noted in section 5.7 of Appendix A4.1 PDGB:

“Where a refuge island is provided, straight crossings are desirable and the refuge island should be 4m wide or more. At a staggered crossing, islands of less than 4m in width may be provided, and these should have a minimum effective width of 2m between obstacles such as signal poles.”

At all proposed staggered crossings, it is not practicable to provide refuge islands of 4m wide or more, apart from at Chainage A3200. At this location, the proposed crossing matches the existing situation, which provides two separate crossings of each carriageway of this 60 km/h speed limit dual carriageway.

A pedestrian crossing is not proposed at Chainage C430 as a footpath is not required on the N3 off-slip and crossings are proposed at Chainage C350 and C450.

A pedestrian crossing is not proposed at southern end of Blanchardstown Road North / Old Navan Road junction at Chainage B790 as a footpath is not proposed along the southern side of Old Navan Road to south of this junction, which will match the existing situation. A pedestrian crossing of Blanchardstown Road South is however available at chainage B650, which is deemed adequate.

A pedestrian crossing is not proposed at eastern end of Blanchardstown Road South / N3 off-slip junction at Chainage B660 as a footpath is not proposed or required along the northern side of N3 off-slip, which will match existing.

It is not practicable to provide a pedestrian crossing at Chainage A2200 to eastern side of Navan Road / N3 Eastbound off-slip as there is a difference in carriageway level each side of the median at this location.

At the Navan Road / Auburn Avenue junction, it is proposed to move the pedestrian crossing from the west side of the junction to the east side of the junction. It is noted in Appendix A6.3 Junction Design Report that the proposed pedestrian crossing on the west side of the junction would be over 20m long and thus determined as too long for comfortable use (compared to a maximum length of 18-19m generally adopted for the CBC design). The proposed pedestrian crossing to the east of the junction provides a more direct desire line to the proposed inbound bus stop at Chainage A2950.

At the Navan Road / Phoenix Park Avenue junction, a pedestrian crossing is not proposed along the eastern side, as all pedestrian movements are catered for via the three crossings to be provided.

At the Navan Road / Old Cabra Road junction, a pedestrian crossing is not proposed to the west side of the junction as this would be a complex arrangement with pedestrians crossing two-way traffic / bus movements on the Navan Road carriageway section to the south and crossing a separate two-lane eastbound carriageway to the north. It is considered that the direct crossings on Navan Road and Old Cabra Road, approximately 120m apart, provide high quality and safe crossing facilities at these locations. A pedestrian crossing is not proposed to the south end of Stoneybatter / Brunswick Street North junction as an additional pedestrian crossing is proposed to the north of the junction and a cyclist crossing to the south of the junction with no additional space available.

A pedestrian crossing is not proposed at the northern end of Blackhall Place / King Street North junction because this would reduce the effective distance and queue stacking space on Blackhall Place between King Street North and Brunswick Street North junctions and hence have a detrimental impact on the management of flow of buses in both directions at this location. The proposed pedestrian crossings of Blackhall Place at Brunswick Street North and King Street North are approximately 60m apart and hence provide good accessibility across Blackhall Place in this area.

A pedestrian crossing will be added to the eastern side of Blackhall Place / Benburb Street junction. At the western side of the junction, the existing uncontrolled crossing will remain in place.

A pedestrian crossing will be added to the western side of Queen Street / Benburb Street junction. At the eastern side of the junction, the existing uncontrolled crossing will remain in place in order to maximise signal green time for LUAS priority.

2.9.4.6 Shared Space

Summary of issue

The submission noted that the Proposed Scheme includes for the provision of shared space for pedestrians and cyclists at several junctions and asserted that this is an unsuitable arrangement for busy urban junctions. The submission insisted that pedestrians and cyclists be segregated at all junctions for the safety and comfort of everyone.

Response to issue

The National Cycle Manual notes that where practicable, the segregation of pedestrians and cyclists is desirable, and shared facilities should not be considered as a first option. The National Cycle Manual recognises, however, that in some cases, shared facilities are appropriate. The design of the Proposed Scheme has been undertaken such that pedestrians and cyclists are segregated wherever practicable and hence shared spaces are only used in specifically constrained locations, or where there is a need to cater for a range of movements typically at junctions.

Provision of signage and road markings will encourage cyclists to carefully negotiate these areas such that safety of pedestrians is not compromised.

2.9.4.7 Bus Stop Design

Summary of issue

The submission raised concerns about the proposed width of bus stop islands and noted that they will lead to conflict between pedestrians and cyclists.

Response to issue

The NTA welcomes Dublin Commuter Coalition's comments in relation to the importance of considering the pedestrian/cyclist interaction at bus stops. Section 11 of Appendix A4.1 Preliminary Design Guidance Booklet (PDGB) of Volume 4 of the EIAR sets out the key measures to address the concerns raised in relation to vulnerable users at these locations which is further elaborated in section 4.14 of the Preliminary Design Report in the 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 which have been carried out during the development of the Proposed Scheme.

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 scheme where space constraints allow. Island bus stops 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 horizontal cycle track deflection is proposed on the approach to the island to reduce cyclists' speed 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.

Where space constraints do not allow for an island bus stop, 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.

Section 4.14.4 Preliminary Design Report in the Supplementary Information lists the locations where island bus stops are proposed. Section 4.14.5 of the same document lists the locations where shared bus stop landing zones are proposed.

2.9.4.8 Blanchardstown to M50 unction

Summary of issue – Blanchardstown Road North Overbridge

The submission stated that there are three traffic lanes in each direction on the overbridge, with a narrow cycle lane with light segregation. The submission stated that a wider properly segregated cycle lane should be provided.

Response to issue

As noted in table 4.3 of Chapter 4 Proposed Scheme Description of Volume 2 of the EIAR;

Cross section has been developed to match the existing across the overbridge structure to minimise any impact. It should be noted that the PDGB acknowledges a reduction in cycle track width to 1.5m is permitted as the absolute minimum.

The northern cycle track, which will be 2.0 m wide, is proposed to be relocated alongside the footpath.

The eastern cycle track will be 1.6 m wide.

The length of cycle lane across the overbridge is approximately 100 m.

In addition, industry-standard cycle lane separators will be installed on the bridge to provide segregation from adjacent traffic instead of kerbed segregation due to existing bridge deck details.

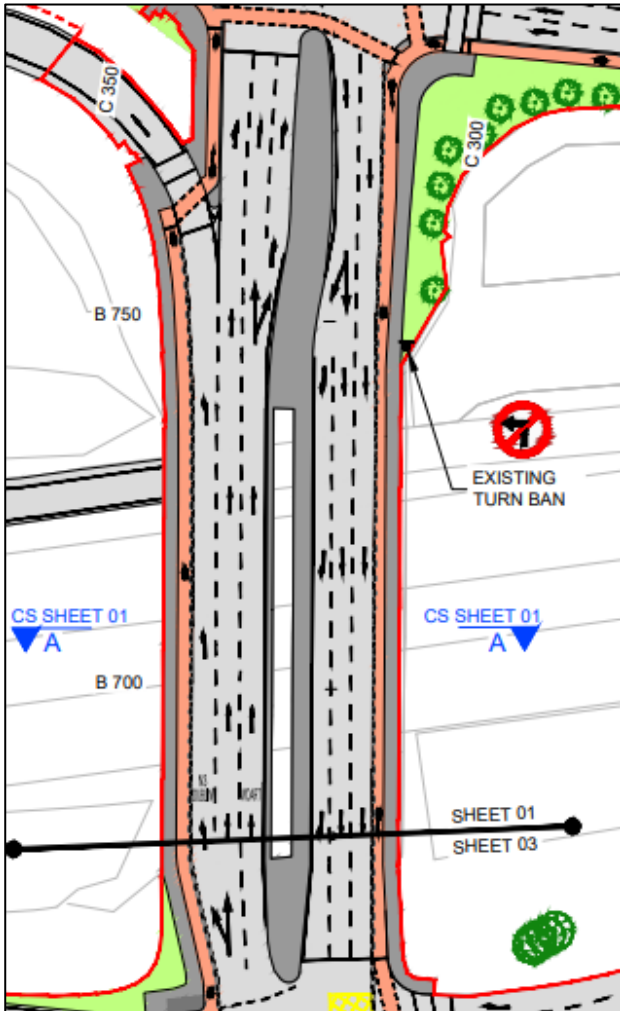


Figure 2.9.28: Blanchardstown Road North Overbridge

Summary of issue - Bus Interchange

The submission noted an eastbound traffic lane to the north of the interchange, which they stated could be removed, with amendments made to the design to allow traffic to utilise the adjacent two-lane road within the car park. This would reduce conflict with pedestrians at the Bus Interchange.

They also suggested the removal of the westbound traffic lane to the south of the Bus Interchange, possibly relocating it to the north of the Bus Interchange. It is suggested that vehicles could then enter and exit through the car park via the access at Chainage E300.

Response to issue

The interchange layout comprises of bus lanes and adjacent bus bays, cycle and pedestrian facilities, and traffic lanes, and provides an appropriate arrangement for safe use by all road users and gives safe access for pedestrians from the bus interchange to shopping areas to the north and south, and safe cycle access to and through the bus interchange area, and access for cars in and out of the adjacent car park. Shared use of space between pedestrians and cyclists is included at a number of locations which reflects the need to cater for a range of movements at these locations. Provision of signage and road markings will encourage cyclists to carefully negotiate these areas such that safety of pedestrians is not compromised.



Figure 2.9.29: Bus Interchange Layout

Summary of issue - Carriageway between Crowne Plaza Junction and L3020 / Liberty Insurance Junction

The submission stated that there are a large number of interruptions to the bus lane and suggested that alterations such as the introduction of yellow boxes at the entrances to the car parks, to ensure bus priority.

Response to issue

The breaks in the bus lane will facilitate access and egress to and from car parks. It is not envisaged that this movement will impede bus priority.



Figure 2.9.30: Extract from General Arrangement drawing

Summary of issue – Snugborough Junction to Auburn Avenue Junction

The submission stated that there is no provision for pedestrians and cyclists between Snugborough junction to Auburn Avenue junction, which does not meet the aim of the Proposed Scheme to provide improved walking, cycling and bus infrastructure.

Response to issue

As noted in section 4.5.3.1 of Chapter 4 of the EIAR, the Proposed Scheme will provide Quiet Street Treatment for cyclists on Castleknock Manor to integrate with secondary route 4A of the Greater Dublin Area (GDA) Cycle Network Plan.

As noted in section 4.5 of the Preferred Route Option Report:

“The proposed route of the CBC cycle facilities will integrate with the route 4A of the GDA Cycle Network Plan via Castleknock Manor at Auburn Avenue Roundabout (refer to Figure 2.9.31 below).

Route 4A also provides connectivity with the Royal Canal Greenway for safe access and cycle facilities on the north side of the N3. It is deemed inappropriate to provide a cycle track between Snugborough Road Junction and Auburn Avenue Junction along the N3, due to engineering constraints of realigning a section of the N3 to facilitate an additional 3 metres of cycle track, with an associated safety buffer, the higher speeds of vehicles and a lack of trip attractors along this section, and safety concerns regarding encouraging cyclists on to the M50 Roundabout and on to a National Primary Route.”

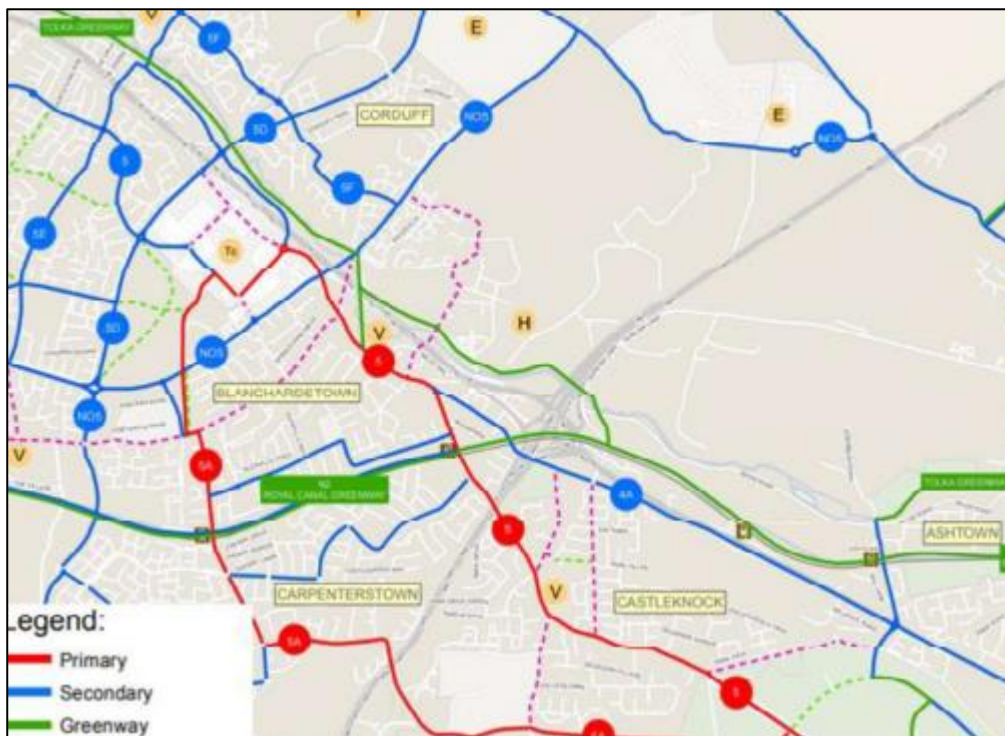


Figure 2.9.31: Extract from GDA Cycle Network Plan showing northern segment of the CBC

2.9.4.9 Navan Road (N3/M50 junction to Old Cabra Road junction)

Summary of issue

The submission welcomed the Proposed Scheme design in this section, particularly with respect to enhanced bus priority infrastructure and cycle lanes. However, they stated that there are significant issues with walking and cycling infrastructure at a number of junctions.

They welcomed the decision to proceed with a four-lane carriageway with two bus lanes and two general traffic lanes in each direction, along with one-way cycle tracks.

They encouraged tree removal to be kept to a minimum.

Response to issue

The NTA welcomes the comments in support of the Proposed Scheme design along the Navan Road.

As noted in section 3.4.1.1 Alternatives Considered at Draft PRO Stage of Chapter 3 Reasonable Alternatives of Volume 2 of the EIAR, the four-lane carriageway option was identified as the preferred option as it best aligned with the objectives for the Proposed Scheme and provided fully segregated bus and cycle facilities in both directions while maintaining access for general traffic.

As noted in section 17.7 Conclusion of Chapter 17 Landscape and Visual of Volume 2 of the EIAR, the Proposed Scheme will give rise to some degree of townscape and visual effect. These impacts arise especially where tree removal is required. The Proposed Scheme includes for replacement and additional tree and other planting where practicable. Residual effects will remain for properties experiencing permanent land acquisition and the loss of trees along the R147 Navan Road. However, the Proposed Scheme will also provide substantial levels of replanting of replacement trees, and a significantly enhanced level of service for public transport and for pedestrian / cycle connectivity.

Detailed responses to the issues raised with respect to junctions are provided in section 2.9.4.4 of this report.

2.9.4.10 Old Cabra Road Junction to Quays

Summary of issue

The submission stated that the proposed changes in traffic management at Old Cabra Road, Prussia Street and Manor Street should end through-traffic on Old Cabra Road and southbound through-traffic in Stoneybatter village and reduce northbound through-traffic. It noted that it supports these proposals which should enhance public transport movement and conditions for pedestrians and cyclists.

The submission also welcomed the segregated cycle lanes in this section and would prefer that a cycle lane extended the full length of Prussia Street, while acknowledging it will have reduced traffic.

Response to issue

The NTA welcomes the comments in support of the Proposed Scheme design along this section.

Prussia Street is a particularly constrained location due to the existing cross section being narrow. Providing a cycle track along the full extent of this section would result in the footpath widths reducing below the minimum width of 1.8m set out in DMURS. Instead, it is deemed suitable for cyclists to merge onto the general traffic lane here due to reduced traffic flows and the proposed speed limit of 30 km/h. As noted in Chapter 6 Traffic and Transport tables 6.62 and 6.67 respectively, the Proposed Scheme (Do Something) is forecasted to have a decrease in traffic flow of 856 PCUs during the AM Peak hour and a decrease in traffic flow of 926 PCUs during the PM peak hour on Prussia Street.

2.9.5 Dublin Cycling Campaign

2.9.5.1 Overview of Submission

This submission raised the following issues:

- Introduction
- National Mobility Policy Targets
- Universal Design
- Support for Design Aspects
- Blanchardstown Town Centre
 - General
 - Junctions
 - Pedestrian Infrastructure
 - Cycling Infrastructure
 - Bus Interchange
- N3 Widening
- Castleknock Manor
- Ashtown Road Junction Linkages
- Cabra – Cycling connections
- Adherence to Standards
- EIAR documentation
- Cycling Infrastructure Assessment

- Transport Modelling Methodology

2.9.5.2 Introduction

Summary of issue

The submission set out that the Dublin Cycling Campaign is a registered charity that advocates for better cycling conditions in Dublin. The submission noted 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.

They are broadly supportive of the scheme from Navan Road Parkway to Ellis Quay, however requested minor modifications. Dublin Cycling Campaign objected to the section of scheme between Mulhuddart and Auburn Avenue due to proposed unsustainable transport infrastructure, road widening, poor quality pedestrian and cycling infrastructure, which are not in accordance with DMURS, traffic management guidelines, the National Cycle Manual and the National Sustainable Mobility Policy.

They requested an oral hearing to discuss these issues.

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 notes that the Dublin Cycle Campaign are broadly supportive of the Proposed Scheme from Navan Road Parkway to Ellis Quay. The NTA notes the request for an Oral hearing which will be a matter for An Bord Pleanála to decide. Requests to modify 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 the continuation of collaboration 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.

2.9.5.3 National Mobility Policy Targets

Summary of issue

The submission set 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 stated that the outer sections of the Proposed Scheme will fall below the standards and quality of service required and will not attract people in the '*Interested but Concerned*' category to provide the modal shift necessary to fulfil the goals of the NSMP.

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's aim and objectives as set out in Section 1.2 of Chapter 1 of Volume 2 of the EIAR have a direct alignment to the objectives that underpin this policy.

2.9.5.4 Universal Design

Summary of issue

The submission stated that the design should comply with Universal Design principles to ensure access for disabled cycling and non-standard or adapted cycles, as well as disabled persons.

The submission noted the seven principles of Universal Design.

Response to issue

As noted in section 4.6.5 Accessibility for Mobility Users of Chapter 4 of Volume 2 of the EIAR:

“The aim of the Proposed Scheme is to provide enhanced walking, cycling and bus infrastructure. In achieving this aim, the Proposed Scheme has been developed using the PDGB and in accordance with the principles of DMURS and Building for Everyone: A Universal Design Approach (NDA 2020). The following non exhaustive list of relevant standards and guidelines have informed the approach to Universal Design in developing the Proposed Scheme:

- *Preliminary Design Guidance Booklet for BusConnects Core Bus Corridors (NTA 2020);*
- *Building for Everyone: A Universal Design Approach (NDA 2020);*
- *UK DfT Guidance on the use of tactile paving surfaces; and*
- *BS8300:2009 +A1:2010 Design of buildings and their approaches to meet the needs of disabled people – Code of practice.*

The Disability Act 2005 (as amended) places a statutory obligation on public service providers to consider the needs of disabled people. An Accessibility Audit of the existing environment and proposed draft preliminary design for the corridor was undertaken. The Accessibility Audit provided a description of the key accessibility features and potential barriers to mobility impaired people based on the Universal Design standards of good practice. The Accessibility Audit was undertaken in the early design stages with the view to implementing any key measures identified as part of the design development process.

In achieving the enhanced pedestrian facilities there has been a concerted effort made to provide clear segregation of modes at key interaction points along the Proposed Scheme which was highlighted as a potential mobility constraint in the Accessibility Audit. In addressing one of the key aspects to segregation, the use of the 60mm set down kerb between the footway and the cycle track is of particular importance for guide dogs, whereby the use of white line segregation is not as effective for establishing a clear understanding of the change of pavement use and potential for cyclist/pedestrian interactions.

One of the other key areas that was focused on was the interaction between pedestrians, cyclists and buses at bus stops. The Proposed Scheme has implemented the use of island bus stops, including signal call button for crossing of cycle tracks, to manage the interaction between the various modes with the view to providing a balanced safe solution for all modes.”

As noted in section 4.2 Accessibility for Mobility Impaired Users of the Preliminary Design Report:

“The assessment of the existing street infrastructure and its ability to support access for disabled users have been based mainly on the Irish Wheelchair Association [IWA] ‘Best Practice Guidelines, Designing Accessible Environments’ and The National Disability Authority’s [NDA] ‘Building for Everyone: A Universal Design Approach’.

In addition, the Bus Interchange has been designed in accordance with BS8300:2009 +A1:2010 Design of buildings and their approaches to meet the needs of disabled people – Code of practice.”

2.9.5.5 Support for Design Aspects

Summary of issue

The submission expressed support for the following proposed design aspects:

- Bus Gate at Old Cabra Road, noting it will limit through-traffic
- Cycle lanes from Castleknock Manor to city centre.
- Offline proposed traffic management measures, to limit ‘rat-runs’
- Proposed scheme design in Stoneybatter and along Queen Street

Response to issue

The NTA welcomes the comments noted in the submission and notes that the proposed measures will meet the aim and objectives of the Proposed Scheme, as set out in section 1.2 of Chapter 1 of Volume 2 of the EIAR.

2.9.5.6 Blanchardstown Town Centre

General

Summary of issue

The submission objected to the proposals between Mulhuddart and the Snugborough Junction Upgrade scheme and noted that the NTA's proposals will significantly shape the public realm and desirability of transport options in Blanchardstown town centre.

The submission stated that the proposed roads in this area include:

- Multiple lane roads that prioritise private car;
- Junctions that are difficult to traverse by walking and cycling; and
- Poor quality walking and cycling infrastructure with low quality of service

The submission stated that the Proposed Scheme places too much emphasis on vehicular movement and not enough on creating a high-quality public realm for pedestrians and cyclists.

The submission quoted a number of objectives from the following policies and guidelines:

- National Planning Framework;
- National Sustainable Mobility Policy;
- Places for People the National Policy on Architecture;
- Town Centres First;
- Design Manual for Urban Roads and Streets;
- Traffic Management Guidelines; and
- Draft Fingal Development Plan (2023 – 2029).

Response to issue

As noted in section 4.6.7 Junctions of Chapter 4 of Volume 2 of the EIAR:

“The design and modelling of junctions have 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.”

As noted in section 6.4.6.1.2.1 Pedestrian Infrastructure of Chapter 6 of the EIAR:

*“It is anticipated that there will be a **Positive, Very Significant and Long-term effect** to the quality of the pedestrian infrastructure along Section 1 of the Proposed Scheme, during the Operational Phase, which aligns with the overarching aim to provide enhanced walking infrastructure on the corridor.”*

Refer to Table 2.9.2 below for further details.

Table 2.9.2: Section 1: Significance of Effects for Pedestrian Impact during Operational Phase

Junction	Chainage	Do Minimum LoS	Do Something LoS	Magnitude of Impact	Sensitivity	Significance of Effect
R121 Blanchardstown Road North / R121 Old Navan Road	B800	D	C	Low	Medium	Positive Moderate
R121 Blanchardstown Road South / Blakestown Way / Access Road to / from Blanchardstown Centre	B100	D	B	Medium	Medium	Positive Significant
R121 Access Road / West Street	F000	F	B	High	High	Positive Profound
West Street / Car Park Access priority junction / Dunnes Service Yard	F225	B	A	Low	High	Positive Moderate
West Street / L3020	A200	E	A	High	High	Positive Profound
L3020 / Blanchardstown Centre south access	A600	E	A	High	High	Positive Profound
Section Summary		D	B	Medium	High	Positive Very Significant

Section 1 is from N3 Blanchardstown Junction to R843 Snugborough Road.

As noted in section 6.4.6.1.2.2 Cycling Infrastructure of Chapter 6 of the EIAR:

*“The Proposed Scheme will have a **Positive, Significant and Long-term effect** on the cycling environment along Section 1.”*

Refer to Table 2.9.3 below for further details.

Table 2.9.3: Section 1 Cycling Impact during Operational Phase

Location	Chainage	Do Minimum LoS	Do Something LoS	Impact	Sensitivity	Significance of Effect
N3 off slip to L121 Church Road	C0 – C200	D	B	Medium	Negligible	Not Significant
L121 Church Road between N3 off slip and Blanchardstown Road North	C200-B800	B	B	Negligible	Low	Not Significant
Blanchardstown Road North and Blanchardstown Road South between L121 Church Road and Blanchardstown Centre west	B800 – B100	B	A	Low	Medium	Positive Moderate
Blanchardstown Centre to Crowne Plaza Hotel	E100 – A200	B	A	Low	High	Positive Moderate
Crowne Plaza Hotel to R843 Snugborough Road	A200 – A900	D	A	High	High	Positive Profound
Section Summary		C	A	Medium	Medium	Positive Significant

As noted in section 6.4.6.1.2.3 Bus Infrastructure of Chapter 6 of Volume 2 of the EIAR:

*“The provision of a new bus interchange and four new stops, along with the improvements in the provision of real-time information, shelters, seating and accessible kerbs throughout Section 1 is assessed as providing a potential high positive impact for bus passengers. This aligns with the overarching aim to provide enhanced bus infrastructure on the corridor and will result in a **Positive, Profound and Long-term effect** on Section 1 of the Proposed Scheme.”*

Refer to Table 2.9.4 below.

Table 2.9.4: Section 1 Bus Qualitative Impact during Operational Phase

Section	Chainage	Description of Impact	Impact	Sensitivity	Significance of Effect
Section 1 – N3 Blanchardstown Centre to R843 Snugborough Road	A000 - A900	<ul style="list-style-type: none"> New bus interchange at Blanchardstown Centre will provide a significant benefit. Significant improvements in the quality of bus stop facilities in this section. Bus lanes provided along the entirety of the corridor. 	High Positive	High	Positive Profound

As noted in section 2.1 of Chapter 2 of Volume 2 of the EIAR:

“The delivery of the Proposed Scheme is supported by International, European Union, National, Regional and Local strategies, policies, and plans.”

In addition, reference is also made to section 4.4 Design Principles of Chapter 4 of Volume 2 of the EIAR:

“The design of the Proposed Scheme was developed with reference to the Preliminary Design Guidance Booklet for BusConnects Core Bus Corridors (PDGB) (NTA 2021) – refer to Appendix A4.1 in Volume 4 of this EIAR. This guidance document 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 project objectives are described in full in Chapter 2 (Need for the Proposed Scheme).

The purpose of the PDGB is to complement existing guidance documents/design standards relating to the design of urban streets, bus facilities, cycle facilities and public realm, which include the following:

- *The Design Manual for Urban Roads and Streets (DMURS) (Government of Ireland 2013);*
- *The National Cycle Manual (NCM) (NTA 2011);*
- *TII National Road Design Standards;*
- *The Traffic Signs Manual (TSM) (DoT 2019);*
- *Guidance on the use of Tactile Paving (UK DfT 2007);*
- *Building for Everyone: A Universal Design Approach (NDA 2020), and*
- *Greater Dublin Strategic Drainage Study (GDSDS) (Irish Water 2005).”*

Junctions

Summary of issue

The submission stated that section 6.1 of Chapter 6 of the EIAR describes scheme objectives and the iterative process the design team undertook in order to produce the preliminary design, which included transport impact assessments (TIA) on the proposed junction designs. The submissions stated that methodology of the TIA of junction design is focussed on reducing average delay per passenger car unit and the junction capacity for motor vehicles. The submission noted that there was no consideration given to crossing times for pedestrians, or additional lanes added to address vehicle congestion, resulting in larger junctions making it more difficult for walking and cycling.

The submission stated that this methodology conflicts with DMURS and Traffic Management Guidelines policies, which state that in different contexts, there should be a balance between the needs of vehicle junction capacity and walking, cycling and good place making.

The submission stated that *TIA Sub Appendix 2 – Junction Design Report* of Volume 4 of the EIAR shows the design evolution of the Blanchardstown Road South / Blakestown Way junction, noting addition of a left-turn slip lane for general traffic to improve junction capacity for vehicles.

The submission noted that slip lanes, where vehicles cut across cyclists sometimes at high speed are proposed. The submission stated that none of the junctions reflect any of the junction types noted in *Appendix A4.1 Preliminary Design Guidance Booklet for BusConnects Core Bus Corridors (PDGB)*.

The submission also noted that it is stated in the Junction Design Report that the provision of a slip lane at Blakestown Way brings the junction in line with the PDGB.

The submission noted that DMURS section 4.4.3 states that designers ‘should omit left-turn slip lanes as they encourage high traffic speeds and are highly disruptive for people walking and cycling’, noting that as per the National Cycle Manual section 7.8, the vehicle slip lanes should be removed.

Response to issue

As noted in section 2.3 of TIA Sub-Appendix 2 Junction Design Report of Volume 4 of the EIAR:

“The prioritisation of people movement and maximising the throughput of sustainable modes (i.e. walking, cycling and bus modes) in advance of the consideration and management of general vehicular traffic (private car) movements at junctions were the policy led approach to the junction design for the Proposed Scheme. Therefore, in order to quantify this for the purposes of supporting this policy led approach, the People Movement at Signals (PMS) Calculator was developed. The PMS Calculator was used to validate the design and the assertion that the proposal would result in greater throughput of people.”

As noted in section 5.3.3 of the Preliminary Design Report, the Proposed Scheme design at junctions is based on typical layouts described in the BCPDGB document, which sets out four different types of junctions, referred to as Junction Types 1-4 (in Section 7.4 Signalised Junction Operation of BCPDGB). Each junction has however been designed as a bespoke arrangement – based in some cases on combinations of features from the different junction types, to suit the particular local constraints and travel demand patterns at each location.

Blanchardstown Road North / Old Navan Road Junction

As noted in TIA Sub-Appendix 2 Junction Design Report of Volume 4 of the EIAR, for the Blanchardstown Road North / Old Navan Road junction, *the existing signal-controlled junction will be modified by removing the left-turn slip lane from Old Navan Road, while retaining the segregated left-turn lane from Blanchardstown Road North towards the N3 slip road on Old Navan Road. Realigned cycle track crossings will be provided, with signal-controlled crossings across the left-turn slip road. The flow of buses through the junction will be maintained by the presence of a bus lane on the Blanchardstown Road North approach, a bus lane on the access from Blanchardstown Bus Interchange past the Crowne Plaza Hotel, and allowing buses from the west (on Old Navan Road) to turn right from the straight-ahead traffic lane.*

The provision of a segregated left turn lane reflects the particular need at this junction to cater for traffic movements towards the N3 national road.

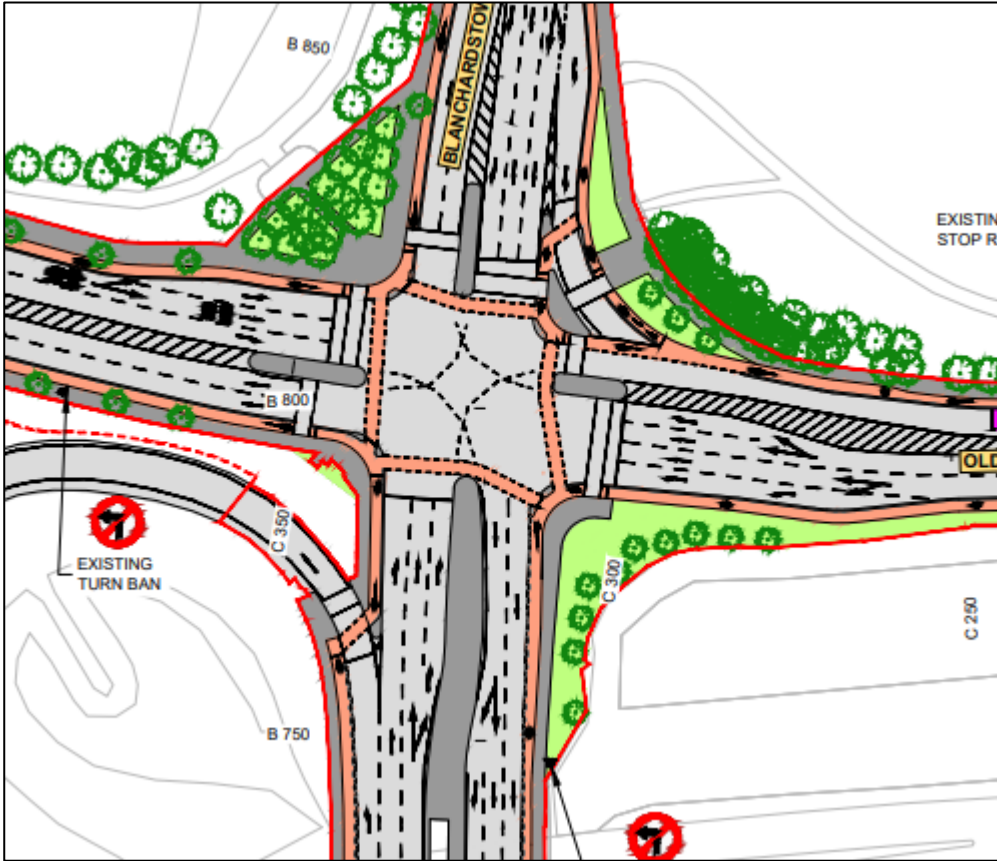


Figure 2.9.32: Blanchardstown Road North / Old Navan Road Junction

Blanchardstown Road South / N3 off-slip Junction

As noted in TIA Sub-Appendix 2 Junction Design Report of Volume 4 of the EIAR, for the Blanchardstown Road South / N3 off-slip junction, *the existing signal-controlled junction will be modified to include a left-turn bus lane on the approach from the Crowne Plaza / N3 westbound off-slip – connecting directly to the bus layover layby on Blanchardstown Road South. Cycle tracks will be provided through the junction on both sides of Blanchardstown Road South.*

The left turn bus lane will ensure minimum delay for buses travelling from the bus interchange to the bus layover location on Blanchardstown Road South.

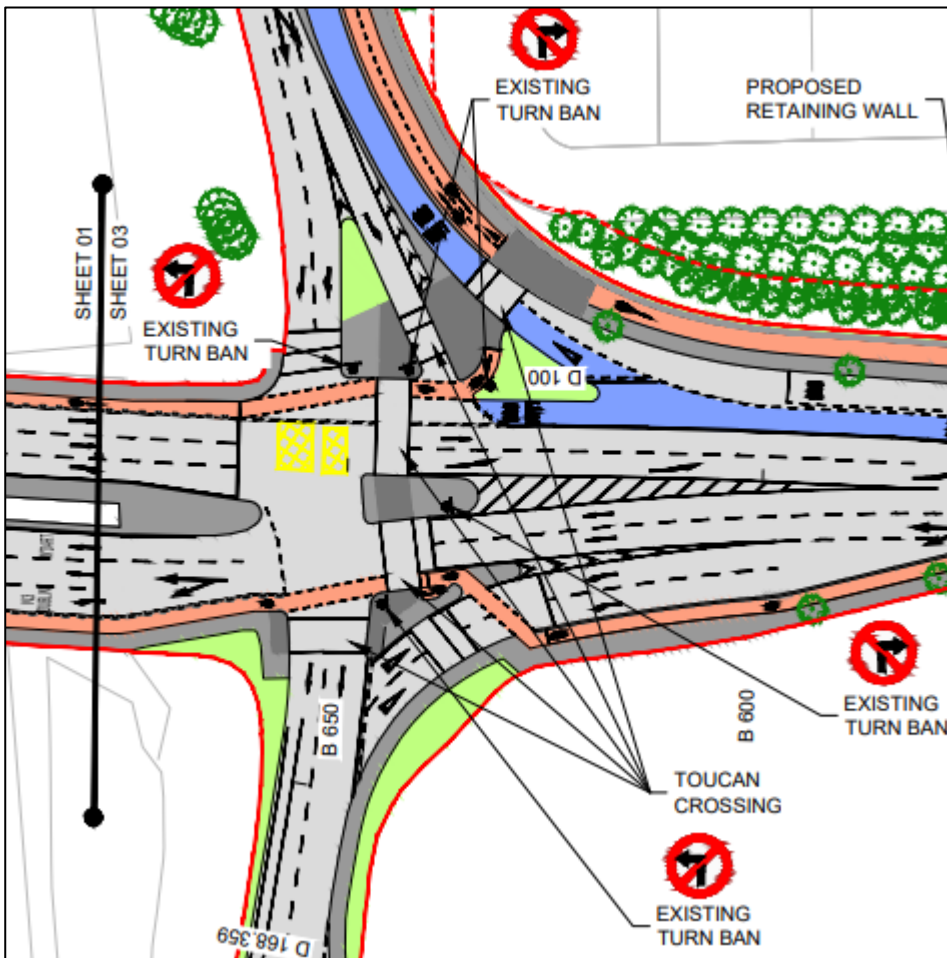


Figure 2.9.33: Blanchardstown Road South / N3 off-slip Junction

Blanchardstown Road South / Blakestown Way Junction

As noted in TIA Sub-Appendix 2 Junction Design Report of Volume 4 of the EIAR, for the Blanchardstown Road South / Blakestown Way junction:

“the roundabout junction of the Blanchardstown Road South and Blakestown Way is proposed to be modified to a four-arm signal-controlled junction. Left turning vehicles will cross the outbound bus lane path 20m from the junction. A segregated left turn lane and separate bus lane will be provided for the movement from Blanchardstown Road South towards the shopping centre.”

The left turn filter bus lane will allow a high degree of priority of buses which will include a regular flow of buses returning from the layover spaces on Blanchardstown Road South to the bus interchange. A left turn filter traffic lane from Blanchardstown Road South towards the shopping centre has been provided to facilitate the movement of traffic towards the shopping car parks. A pedestrian island has been provided between the left-turn lanes and straight-ahead lanes on Blanchardstown Road South, to provide pedestrians and cyclists with a safe crossing of the bus lane, while also providing a high level of priority for buses.

The Junction Design Report notes that the ‘removal of second pedestrian crossing on left turn and improvements to shared space’ and not the provision of a slip lane ‘brings junction in line with BusConnects Preliminary Design Guidance Booklet principles’.

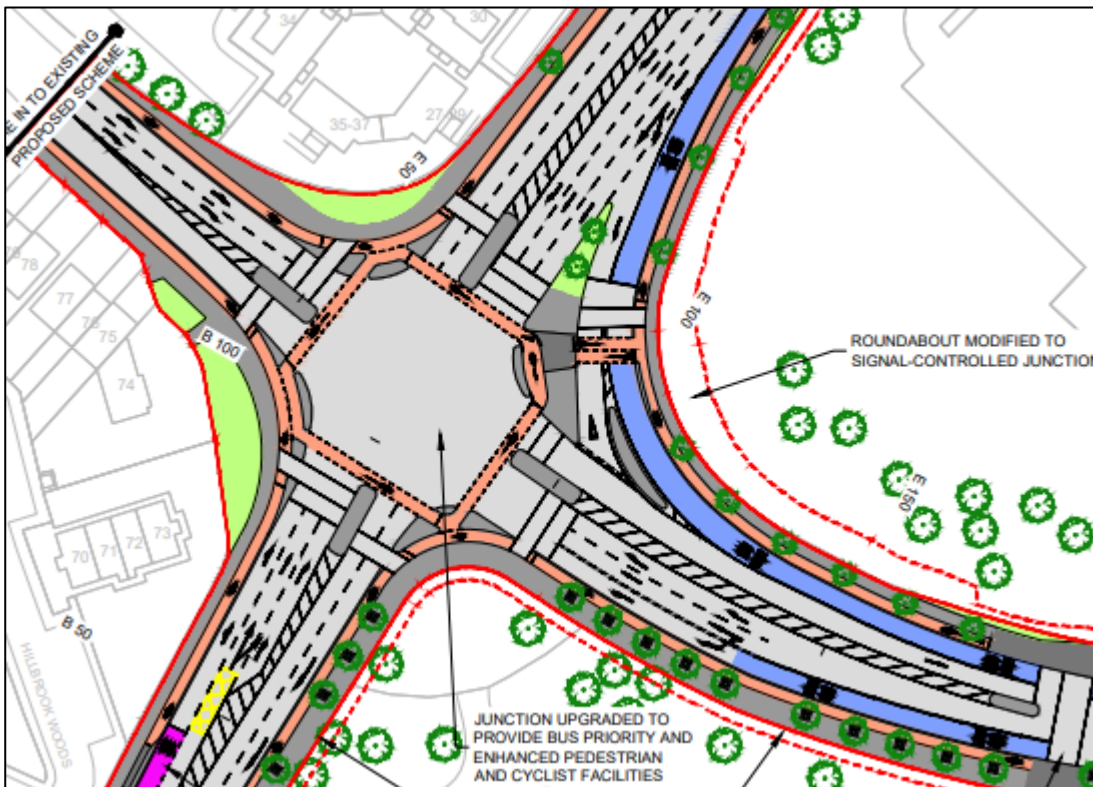


Figure 2.9.34: Blanchardstown Road South / Blakestown Way Junction

Pedestrian Infrastructure

Summary of issue

The submission noted that section 6.4.6.1 of Chapter 6 of the EIAR examines the potential impacts for the proposed scheme on pedestrian infrastructure. The submission stated that the EIAR uses a number of criteria to indicate that the impacts will be **positive, very significant and long-term**.

The submission stated that the proposed pedestrian infrastructure is not high quality as the assessments suggests.

The submission noted that the criteria used include pedestrian directness, vehicular speeds, accessibility and footpath widths.

The submission stated that the TIA states that footpath widths of 2m provides a level of service (LoS) of A around Blanchardstown Town Centre. The submission noted that section 4.3.1 of DMURS states that the minimum footpath width is 1.8m and that *in densely populated areas and busier streets, additional width must be provided to allow people to pass each other in larger groups*, including up to 4m in areas of high pedestrian activity such as town centres. The submission noted that Blanchardstown Road South only has 2m wide footpaths on both sides of the road.

The submission stated that the criteria used to assess the pedestrian infrastructure does not include a number of important factors including pedestrian crossing distances, pedestrian waiting times, or the use of shared space with people cycling, and stated this was not assessed as it would show a poor experience for pedestrians.

Response to issue

The following is noted in section 6.4.6.1.1 Pedestrian Infrastructure of Chapter 6 of the EIAR:

“the impacts to the quality of the Pedestrian Infrastructure as a result of the Proposed Scheme have been considered with reference to any changes to the existing pedestrian facilities along footpaths and crossing locations within the direct study area. Reference has been made to the overall changes along the full length of the Proposed Scheme and the impact assessment primarily focuses only on the pedestrian facilities at junctions to provide a direct comparison between the Do Minimum and Do Something scenarios.”

Where the Proposed Scheme introduces a change to a junction layout, the impact on pedestrians has been assessed using a set of criteria which has been derived from guidance.

The contents of Table 2.9.5 outlines the assessment criteria for each junction.

Table 2.9.5: 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 (or raised table treatment) 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?

A LoS rating has been applied to each junction for both the Do Minimum and Do Something scenarios based on whether the above indicators have been met Table 2.9.6 which shows that the LoS at Blanchardstown Road South/ Blakestown Way junction, with the scheme in place, is appropriate and safe, with an overall LoS B rating.

Table 2.9.6: Pedestrian Junction Assessment LoS

LoS	Indicators Met (of a Total of 5)
A	5
B	4
C	3
D	2
E	1
F	0

Cycling Infrastructure

Summary of issue

The submission stated that the EIAR notes the proposed scheme will have a positive, significant and long-term effect on the cycling environment in this area.

The submission stated the proposals will not deliver high-quality cyclist infrastructure and noted that the criteria used to assess is segregation, width and junction treatment. The submission noted that section 7.3 of the NCM includes a quality-of-service calculator, which includes number of conflicts per 100m, journey time delay and HGV influence.

The submission noted that the segregation rating provided is given a score of A as off-road cycle tracks are provided. However, the submission noted that a large number of shared spaces with pedestrians are proposed and stated that the NCM states *shared facilities should be avoided in urban areas as far as possible as they reduce the level of service to both people walking and cycling.*

The submission noted that shared facilities are generally rejected by disabled persons and the heavy use of shared space is unnecessary and could be avoided through an alternative design.

Response to issue

As noted in section 6.4.6.1.1.2 Cycling Infrastructure of Chapter 6 of the EIAR:

“The impacts to the quality of the cycling infrastructure as a result of the Proposed Scheme have been considered with reference to the changes in physical provision for cyclists provided during the Do Minimum and Do Something scenarios.

The NTA's National Cycle Manual's Quality of Service (QoS) Evaluation criteria have been adapted for use in assessing the cycling qualitative impact along the Proposed Scheme. The refined cycling facilities criteria are as follows:

- Segregation: a measure of the separation between vehicular traffic and cycling facilities;
- Number of adjacent cyclists / width: the capacity for cycling two abreast and / or overtaking ('2+1' accommodates two abreast plus one overtaking); and
- Junction Treatment: a measure of the treatment of cyclist traffic at existing junctions''

Table 2.9.7: Cycling Assessment Criteria

LoS	Segregation	No. of adjacent cyclists/width		Junction treatment
A+	High degree of separation. Minimal delay	2+1	2.5m	Cyclists get green signal priority at signalised junctions / has priority across uncontrolled junctions
A	Well separated at mid-link with some conflict at intersections	1+1	2.0m	Crossings at signalised junctions for cyclists along Proposed Scheme / Protected junctions not already classified as A+ for junction treatment
B	On-road cycle lanes or carriageway designated as 'quiet cycle routes'	1+1	1.75m	Cyclists share green time with general traffic and cycle lanes continue through the junction, for junctions not already classified as A or A+ for junction treatment
C	Bicycle share traffic or bus lanes	1+0	1.25m	Cyclists share green time with general traffic with cycle facilities (advanced stacking locations / cycle lanes) available up to the junction but don't continue through
D	No specific bicycle facilities	1+0	0.75m	No specific bicycle facilities

As noted in Table 2.9.7, a LoS of A includes for some conflict at intersections. Shared use of space between pedestrians and cyclists is included at a number of junctions which reflects the need to cater for a range of movements at these junctions. Provision of signage and road markings, and in many cases a curved alignment around corner radii, will encourage cyclists to carefully negotiate these areas such that safety of pedestrians is not compromised.

Bus Interchange

Summary of issue

The submissions stated that the layout of the bus interchange alienates bus users and requires amending around general traffic movement and prioritising cycling and walking.

The submission noted that cyclists will be obliged to use an unacceptable shared facility and two road crossings at one location and stated that vehicles have a dedicated slip lane and west to east access road. It argued that it is more logical to continue the two-way cycle track along the proposed section and relocate the general traffic lane to the south of the bus interchange.

Response to issue

The layout of the bus lanes and adjacent bus bays, cycle and pedestrian facilities, and traffic lanes, provides an appropriate arrangement for safe use by all road users, and gives safe access for pedestrians from the bus interchange to shopping areas to the north and south, and safe cycle access to and through the bus interchange area. Shared use of space between pedestrians and cyclists is included at the Bus Interchange western access junction which reflects the need to cater for a range of movements at this location. Provision of signage and road markings will encourage cyclists to carefully negotiate these areas such that safety of pedestrians is not compromised.



Figure 2.9.35: Extract from General Arrangement Drawing (Bus Interchange Western Access Junction)

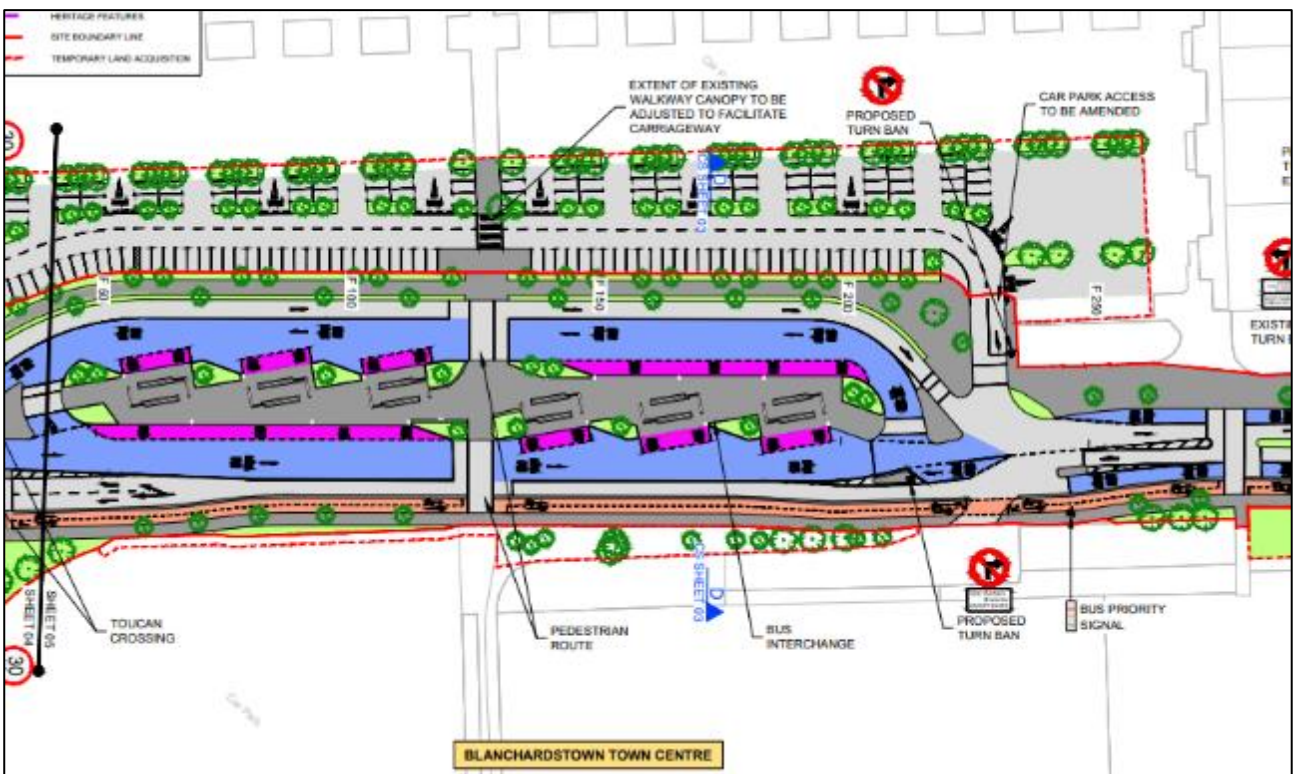


Figure 2.9.36: Extract from General Arrangement Drawing (Bus Interchange)

They are called Quiet Streets due to the low volume of general traffic and are deemed suitable for cyclists sharing the roadway with the general traffic without the need to construct segregated cycle tracks or painted cycle lanes. The Quiet Street Treatment would involve appropriate advisory signage for both the general road users and cyclists.”

Castleknock Manor leads to a residential area and is a cul-de-sac, thus will not be subject to through-traffic.

2.9.5.9 Ashtown Road Junction Linkages

Summary of issue

The submission noted that the NTA has also applied for planning permission to An Bord Pleanála for DART+ west scheme, and that this includes for cycle tracks on Ashtown Road.

The submission stated that the Proposed Scheme should include for linking cycle tracks between the DART+ scheme and Ashtown road junction, to provide a coherent cycle network.

Response to issue

While it would also be desirable to improve all surrounding areas, the Proposed Scheme has focussed on improving facilities along the corridor, based on the scheme objectives. It is likely that future schemes, brought forward either by the relevant Local Authority or the NTA, will address these connections and the Proposed Scheme allows for this to happen at a future date.

2.9.5.10 Cabra – Cycling connections

Summary of issue

The submission noted that ‘coherence’ is one of the five needs of cyclists as outlined in the National Cycle Manual.

The submission stated that the Proposed Scheme should include for integration of cycle lanes on Ratoath Road, Cabra Road and North Circular Road, as they are secondary routes on the Greater Dublin Area Cycle Network Plan.

Response to issue

While it would also be desirable to improve all surrounding areas, the Proposed Scheme has focussed on improving facilities along the corridor, based on the scheme objectives. It is likely that future schemes, brought forward either by the relevant Local Authority or the NTA, will address these connections and the Proposed Scheme allows for this to happen at a future date.

2.9.5.11 Adherence to Standards

Summary of issue

The submission noted concern about the proposed speed limits of 60 km/h in some areas particularly at Blanchardstown Town Centre and noted that an adequate buffer zone will not be provided between cyclists and traffic in accordance with the National Cycle Manual.

It is also noted that the NCM states that shared facilities should be avoided when separate facilities can be provided, noting that junction design should be revisited.

Response to issue

Pedestrian and cyclist provisions are deemed to be reflective of the proposed speed limits in the area with segregated facilities and signalised crossings fundamental to the design. Giving due consideration to the National Cycle Manual (Section 1.7.4: Guidance Graph), raised cycle lanes/tracks (with vertical and horizontal segregation) are proposed to adequately segregate cyclists from traffic. Crossing locations for cyclists and pedestrians are incorporated at signalised junctions/crossings providing a positively controlled environment. The design therefore ensures there are no instances of uncontrolled crossing locations traversing the main carriageways in this area. Additionally, good inter-visibility exists at the crossing locations between drivers and pedestrians.

As noted in section 5.3 Cycle Track Width (Figure 7) of Appendix A4.1 PDGB of Volume 4 of the EIAR, as a raised kerb is being used as a buffer between the cycle track and the carriageway, a 0.50m buffer is deemed acceptable. The overall cycle track width of 2m has been determined based on the NCM width calculator as follows 0.25m inside edge +1.25m cycling regime + 0.5m outside edge = 2m width.

2.9.5.12 EIAR Documentation

Summary of issue

The submission noted that the General Arrangement (GA) and Typical Cross Sections drawings sets do not provide the required information to allow for an accurate assessment because:

1. The GA drawings do not clearly indicate where all junctions and crossings are signalised;
2. There is insufficient labelling of street and road names; and
3. There is an inadequate number of typical cross sections.

The submission also stated that the technical nature and volume of documents present a potential barrier to lay persons seeking to access information and participate in the planning process. It is argued that there are shortcomings in complying with domestic, EU and international law on access to environmental information (e.g. Aarhus Convention and EU Directive 2003/4/EC dated 28 January 2003). The submission also noted that schemes of this nature should be accompanied by clear and unambiguous visualisations of the proposals.

Response to issue

As noted in section 4.2 Proposed Scheme Overview of Chapter 4 of Volume 2 of the EIAR:

“The description of the Proposed Scheme is supported by a series of drawings (listed in Table 4.2 below), which are contained in Volume 3 of the EIAR and these should be read in conjunction with this chapter.”

In addition, table 1.1 of the Preliminary Design Report, included in Supplementary Information, includes an explanation of design content on each drawing set and notes the following for the Junction Systems Design drawings:

“Provides a more detailed overview of the proposed junction arrangements for pedestrians, cyclists, buses and general traffic with an indication of the proposed junction staging and associated signal head arrangements for key signalised junctions/signalised crossings along the route.”

In addition, Appendix A6.3 Junction Design Report of Volume 4 of the EIAR documents the evolution of the design of key junctions and provides details of the proposed signal operation at each of the noted junctions.

Sufficient labelling of street and road names has been provided on the General Arrangement drawings. In addition, the General Arrangement drawings includes a ‘Key Plan’ drawing which labels each sheet number along the Proposed Scheme.

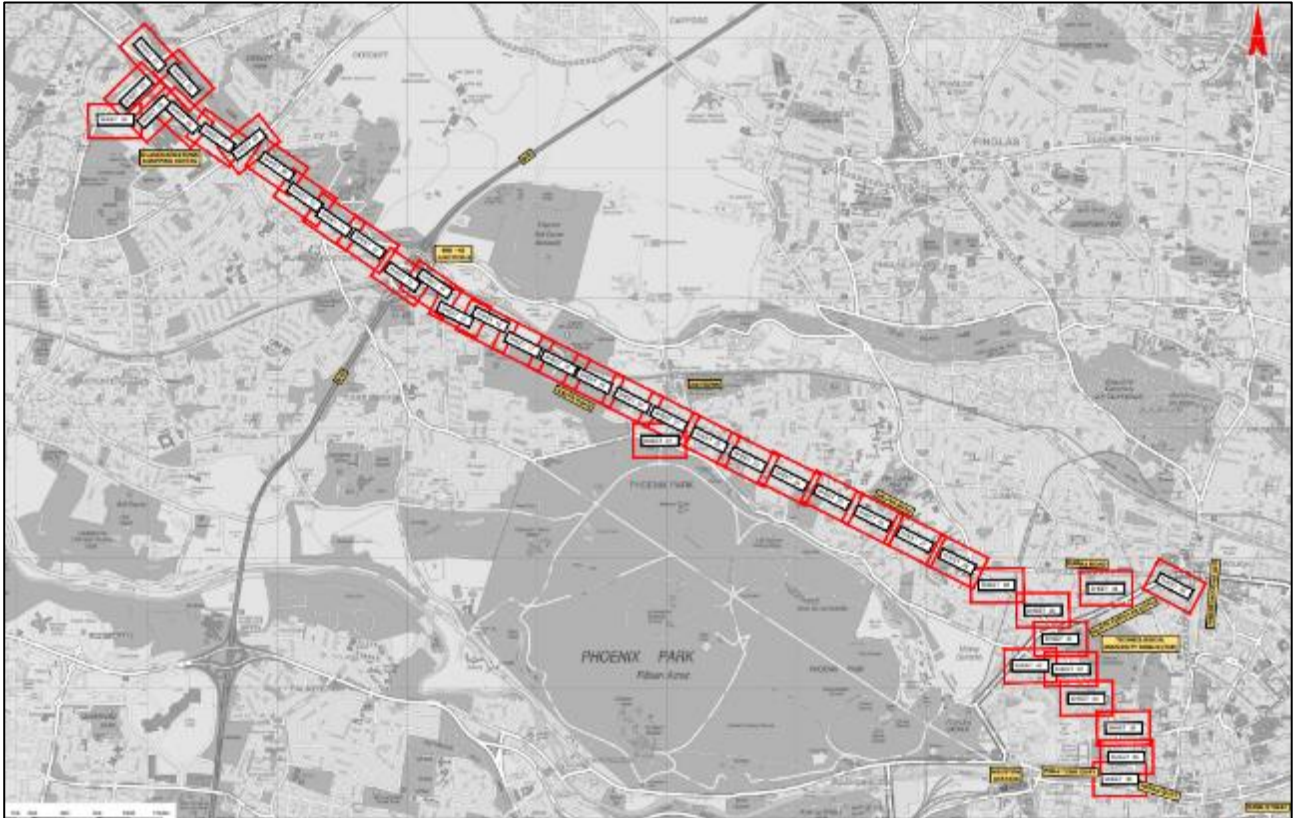


Figure 2.9.38: Extract from General Arrangement Key Plan

The Typical Cross Sections drawings, which form part of Volume 4 of the EIAR are to be read in conjunction with the General Arrangement drawings. As noted in Table 1.1 of the Preliminary Design Report, the Typical Cross Sections drawing set *provides an indication of the proposed cross section works in comparison to the existing road geometry. Indicative pavement/kerbing, boundary treatments and key street furniture are also provided for context.*

Additional supplementary information has also been included in section 4.3 Mainline Cross-Section (Lane Widths) in the Preliminary Design Report.

The NTA notes the comment regarding the technical nature and volume of the documents presenting a potential barrier to the lay person seeking access to information relating to the scheme. Given the nature of such infrastructure schemes as BusConnects Core Bus Corridors, there is invariably a substantial amount of technical information which needs to be provided, so as to ensure that the consent application is comprehensive in nature to meet legislative requirements and provide the competent authority with the necessary information to allow them to reach a decision. Chapter 1 in Volume 2 of the EIAR contains information on the content and structure of the EIAR. Section 1.5.6 of Chapter 1 sets out the information which must be contained in the EIAR. The NTA has sought to make the information as concise as possible, while ensuring that the necessary information has been provided. Section 1.5.7 of Chapter 1 sets out the structure of the EIAR. It is considered that the structure of the EIAR does provide the necessary legibility for those interested parties (both lay persons and technical specialists) to find the information of relevance to them. While the EIAR has been prepared in compliance with the EIA Directive, it has also been written to make it accessible to a wider, non-specialist audience in so far as possible.

Where technical terminology is used, an explanation is provided in the text, and / or in the glossary of terms which is provided at the beginning of Volume 2 of the EIAR. With regard to the comment that the scheme needs to be accompanied by clear and unambiguous visualisations of the proposals, the NTA considers that the comprehensive scheme drawings provided do indeed provide the necessary information on the scheme.

2.9.5.13 Cycling Infrastructure Assessment

Summary of issue

The submission noted reservations regarding the Cycling Infrastructure Assessment methodology and noted there is no background information as to how the Level of Service (LoS) criteria provided in Tables 10 to 12 of Appendix A6.4 of Volume 4 of the EIAR was developed.

The submission also made observations regarding inconsistencies contained in Table 13 of Appendix A6.4 of Volume 4 of the EIAR.

Response to issue

As noted in section 6.4.6.1.1.2 Cycling Infrastructure of Chapter 6 Traffic and Transport of Volume 2 of the EIAR:

“The impacts to the quality of the cycling infrastructure as a result of the Proposed Scheme have been considered with reference to the changes in physical provision for cyclists provided during the Do Minimum and Do Something scenarios. The NTA’s National Cycle Manual’s Quality of Service (QoS) Evaluation criteria have been adapted for use in assessing the cycling qualitative impact along the Proposed Scheme.

The refined cycling facilities criteria are as follows:

- *Segregation: a measure of the separation between vehicular traffic and cycling facilities;*
- *Number of adjacent cyclists / width: the capacity for cycling two abreast and / or overtaking (‘2+1’ accommodates two abreast plus one overtaking); and*
- *Junction Treatment: a measure of the treatment of cyclist traffic at existing junctions*

Table 2.9.8: Cycling Assessment Criteria

LoS	Segregation	No. of adjacent cyclists/width		Junction treatment
A+	High degree of separation. Minimal delay	2+1	2.5m	Cyclists get green signal priority at signalised junctions / has priority across uncontrolled junctions
A	Well separated at mid-link with some conflict at intersections	1+1	2.0m	Crossings at signalised junctions for cyclists along Proposed Scheme / Protected junctions not already classified as A+ for junction treatment
B	On-road cycle lanes or carriageway designated as ‘quiet cycle routes’	1+1	1.75m	Cyclists share green time with general traffic and cycle lanes continue through the junction, for junctions not already classified as A or A+ for junction treatment
C	Bicycle share traffic or bus lanes	1+0	1.25m	Cyclists share green time with general traffic with cycle facilities (advanced stacking locations / cycle lanes) available up to the junction but don’t continue through
D	No specific bicycle facilities	1+0	0.75m	No specific bicycle facilities

As the cycle provision varies along the corridor, each section of the Proposed Scheme has been further separated into smaller subsections in order to apply the cycling assessment criteria appropriately.

When comparing the Do Minimum and Do Something scenarios for cyclists, the terms outlined in Table 6.24 (reproduced as Table 2.9.9 below) have been used to describe the potential impact, based on the changes in the Qualitative Cycling LoS rating.

Table 2.9.9: Description of Impact for Cycling Qualitative Assessment

Magnitude of Impact	Change in LoS Rating
High	3 to 4
Medium	2
Low	1
Negligible	0

To establish the Significance of Effect for the impacts of the cycling infrastructure, as a result of the Proposed Scheme, a sensitivity rating has been applied to each assessed section in accordance with the methodology set out in section 6.2.”

N3 Slip Road to Blanchardstown Road North / South

Summary of issue

For the N3 slip road to the R121 Blanchardstown Road North/South Junction (chainage C0-C200), it is noted that the segregation text has been incorrectly given a LoS rating of B and labelled a ‘Bicycle share traffic or bus lane.’

Response to issue

The text should state ‘primarily off-road cycle tracks’. The LoS rating for the segregation criteria should be changed to A. The overall LoS rating for this section should therefore be amended to A and the impact to ‘High’ It is emphasised that this does not change the significance of effect as the sensitivity of environment is negligible.

Based on the above, the N3 slip road to the R121 Blanchardstown Road North/South Junction (chainage C200-B800) has been re-assessed. The LoS rating for the segregation criteria is currently a B, however, should be an A with text stating ‘primarily off-road cycle tracks.’ This changes the overall LoS rating for this section to an A. The impact for this section changes from negligible to low. The significance of effect for this section should be ‘Positive Slight’.

Slip Road onto N3 from Waterville Road

Summary of issue

The submission noted that the slip road at chainage C100 from Waterville Road is not assessed as a junction, where cyclists will cross a slip lane and a traffic lane.

Response to issue

The chainage C100 is located on old Navan Road and not Waterville Road. This has been assessed within the R121 Blanchardstown Road North/South Junction (chainage C0-C200), as per the comments above.

The slip road onto the N3 from Waterville Road has been assessed within Table 14 of Appendix A6.4 of Volume 4 of the EIAR, as this is part of ‘Section 2’ of the scheme. Table 13 only identifies the junctions along ‘Section 1’ of the scheme. There are no cyclist facilities available along the slip road identified. The northern section of the slip road has not been assessed as it is not part of the Proposed Scheme, but instead part of the Snugborough junction upgrade scheme (Fingal County Council).

Blanchardstown Road South / Blakestown Way Junction (Chainage B800 / E100)

Summary of issue

For the Blanchardstown Road South / Blakestown Way junction the submission stated that the ‘highest rating for LoS for junction treatment and not the worst case as is industry practice’ has been used.

Response to issue

The A rating for junction treatment is based on all junctions along this section (chainage B800 - B100), which have a mixture of LoS’s between A+ and B at the junctions for cyclists. Cyclists have priority at uncontrolled junctions along this section which is classed as an A+ LoS rating. For signalised junctions, there are a mix of toucan crossings provided (LoS A) and cyclists generally sharing green time with general traffic (LoS B), with cycle lanes continuing through the junctions. Whilst the Blanchardstown Road South / Blakestown Way junction has a LoS rating of B for junction treatment due to cyclists sharing green time with general traffic, the average overall LoS rating across the whole section is A, showing an improvement for cyclists. This is based on a technical assessment and the adopted methodology used to assess the cyclist impact for the Proposed Scheme, which as outlined previously is based on the National Cycle Manual’s Quality of Service (QoS) evaluation criteria.

Blakestown Way Junction to Crowne Plaza Hotel

Summary of issue

The submission stated that the Blakestown Way Junction to Crowne Plaza Hotel section is incorrectly noted as having a “continuous cycle track”, yet there is substantial shared space in several locations, particularly at the bus interchange.

Response to issue

In terms of shared space for cyclists between the Blakestown Way junction to Crowne Plaza Hotel, there is limited shared space along this section of the route, with there being clear two-way off-road cycle tracks. Shared space is provided at a mid-block toucan crossing at chainage E200 to cater for both pedestrians and cyclists. Toucan crossings are available prior to the bus interchange to allow safe crossing, where a cycle lane terminates on one side of the road – to re-join two-way cycle track on the other side of the road. Shared use of space between pedestrians and cyclists is included at the Bus Interchange western access junction which reflects the need to cater for a range of movements at this location. Shared space is also provided at Crowne Plaza Hotel Junction to cater for both pedestrians and cyclists crossing at the junction. This is a limited amount of shared space in comparison to the rest of this section provided primarily at junctions, with the majority of the route providing clear off-road two-way cycle track. Consequently, the LoS rating of A for this section is considered appropriate.

2.9.5.14 *Transport Modelling Methodology*

Summary of issue

The submission noted that both the Eastern Regional Model (ERM) and Local Area Model (LAM) which were used for modelling the Proposed Scheme do not account for cyclists or pedestrians, with only the micro-simulation model accounting for cycling.

Response to issue

This is incorrect. The NTA’s East Regional Model (ERM) is the primary tool which has been used to undertake the strategic modelling of the Proposed Scheme and has provided the strategic multi-modal demand outputs for the proposed forecast years.

As stated in section 4.3.1.2 of Appendix A6.1 Transport Impact Assessment Report of Volume 4 of the EIAR:

“The ERM is a strategic multi-modal transport model representing travel by all the primary surface modes – including, walking and cycling (active modes), and travel by car, bus, rail, tram, light goods and heavy goods vehicles, and broadly covers the Leinster province of Ireland including the counties of Dublin, Wicklow, Kildare, Meath, Louth, Wexford, Carlow, Laois, Offaly, Westmeath, and Longford, plus Cavan and Monaghan.”

Section 6.4.6.2.1 of Chapter 6 of the EIAR includes a detailed People Movement assessment showing:

“The average number of people moved by each transport mode (i.e., Car, Bus, Walking and Cycling) along the corridor in the inbound and outbound direction. This metric is compared for the Do Minimum and Do Something scenarios in the AM and PM peak hours for each forecast year (2028, 2043). This metric provides an estimate of the modal share changes on the direct CBC as a result of the Proposed Scheme measures.”

Section 6.4.6.2.2 of Chapter 6 of the EIAR states the following:

“The Proposed Scheme will facilitate a step change in the level of segregated cycling provision in comparison with existing conditions along the entire length of the corridor. The transport modelling is conservative in terms of the predicted cycling mode share. The Proposed Scheme has been designed to cater for much higher levels of cycling uptake than modelled outputs, to cater for long-term trends in travel behaviours as people make sustainable travel lifestyle choices, which would otherwise not be achievable in the absence of the Proposed Scheme.”

2.9.6 Fingal County Council

2.9.6.1 *Structure of Submission*

The topics within the submission are set out as follows:

- Introduction
- General Comments
- Integration with Cycling
- Impact of the proposed development on N3
- Blanchardstown Town Centre – Transportation
- Blanchardstown Town Centre – Public Realm
- R147 Navan Parkway Interchange
- Drainage
- Conclusion

2.9.6.2 *Introduction*

Summary of issue

FCC declared their support for the Proposed Scheme and welcomed the opportunity to engage with the NTA to ensure that the Proposed Scheme is designed and implemented to take full account of the existing and future needs of the citizens, businesses and communities of Fingal and ensure that the final layout is the optimal design alignment within Fingal.

FCC stated that their objective is to see the provision of a sustainable, high quality and efficient transport corridor that will underpin the future sustainable development of the N3 corridor and the wider Dublin 15 area. FCC stated that the coordination of the proposed CBC proposals with the various other transport proposals being considered by FCC and the NTA in this area will be a critical aspect in ensuring that the overall capacity of the corridor is maintained both during construction and in the longer-term operational stage.

Response to issue

FCC's support for the scheme is noted and welcomed by the NTA. The NTA acknowledges FCC's comment that they welcome the continued engagement with the NTA to ensure the Proposed Scheme is designed and implemented to take account of the needs of citizens, businesses, and communities of Fingal, ensuring an optimal design alignment.

The NTA note FCC's objective for the provision of a sustainable, high quality and efficient transport corridor, which should be coordinated with other transport proposals, to ensure the overall capacity of the corridor is maintained during the construction and operational stages.

2.9.6.3 *General Comments*

Summary of issue

FCC stated that they have prepared various Master Plans, SDZs and Local Area Plans in the vicinity of the Proposed Scheme, in order to support the sustainable development of strategic areas identified in the Fingal Development Plan 2017-2023. It is noted that a large number of these strategies are situated within the catchments of the Proposed Scheme.

FCC stated that these development areas are in addition to the significant residential and other development in Fingal outside of these designated areas in line with the Fingal Development Plan 2017-2023.

FCC noted that the key aim of these policies and plans is to establish parameters for urban design and to create permeability, connectivity, and appropriate densities, alongside delivery of community and amenity facilities, in order to leverage the potential of the existing and future transportation infrastructure in Blanchardstown, such as BusConnects, MetroLink, Dart+ and the Greater Dublin Area Cycle Network.

FCC noted that there are significant planning applications likely in the Blanchardstown area, including Blanchardstown Town Centre itself, over the coming years and the provision of improved bus services operating along a CBC will be a significant element in the achievement of sustainable development in the wider Dublin 15 area.

Objective MT33 of the Fingal Development Plan 2017-2023 facilitates and promotes the enhancement of bus services through bus priority measures including bus lanes. FCC stated that any delay to the delivery of the schemes in the short-term potentially jeopardises the ongoing development of residential and mixed-use lands across Fingal, and in particular in Blanchardstown, Mulhuddart and the Dublin 15 area, potentially undermining key national and local policy objectives including those of the National Development Plan, Rebuilding Ireland, Fingal Development Plan and Transport Strategy for the Greater Dublin Area.

Response to issue

NTA acknowledge FCC comments around their need for the scheme and note that reference is made to the Fingal Development Plan 2017 – 2023, the National Development Plan and Transport Strategy for the Greater Dublin Area, along with a number of other local, regional, national and international policies in Chapter 2 Need for the Proposed Scheme of Volume 2 of the EIAR and in the Planning Report (Appendix A2.1 in Volume 4 of the EIAR).

2.9.6.4 Integration with Cycling

Summary of issue

FCC stated that the Proposed Scheme will bring enhanced levels of service for bus users and will also bring improved walking and cycling facilities. FCC support the improvements for walking and cycling at several of the proposed junctions along the bus corridor. However, FCC stated that it is not clear that the scheme will realise the opportunity to provide integrated cycle parking solutions at bus stops, including a much higher number of high quality, covered and secure facilities to facilitate passengers who wish to make the first leg of their journey by bicycle, and thereby extend the bus network catchment. FCC stated it has an extensive programme of cycling and walking improvements planned to maximise the passenger catchment of the various existing and proposed public transport services along the Blanchardstown corridor, under the auspices of the NTA's GDA Cycle Network. FCC stated that the provision of smaller interventions to improve accessibility should have been incorporated into the proposed design. For instance, the inclusion of at least 5-10 cycle stands at all CBC bus stops should be applied as standard across the scheme, rather than "where practicable" as proposed in the application. This would be consistent with Objective MT22 of the Fingal Development Plan which is to improve pedestrian and cycle connectivity to stations and other public transport interchanges.

Response to issue

As noted in section 4.6.3.6 of Chapter 4 of Volume 2 of the EIAR:

"Cycle stands will be provided, where practicable, at island bus stops and key additional locations."

Section 5.4 of Spatial considerations for geometric layout of Appendix A of Bus Stop Review Report which is included in Appendix H of the Preliminary Design Report states the following:

"The provision of high-quality bus stop infrastructure that is customer orientated is considered an essential part of the BusConnects offering, including:

- *Being fully accessible for all bus passengers;*
- *Having a bus shelter for waiting passengers;*
- *Having both timetable and real time passenger information (RTPI) available to passengers;*
- *Having sufficient footpath space to allow the free movement of pedestrians passed the bus stop;*

- *Continuous cycle lane past the bus stop; and*
- *Provision of Cycle Parking at, or close to, the bus stop.*

All of which requires significant space along the already congested radial routes that the Core Bus Corridors run along. Therefore, an important aspect of locating bus stops is identifying locations that have sufficient space to accommodate all, or most, of these elements.

Providing cycle parking at bus stops has the potential to increase the catchment area of a bus corridor by providing a safe place for cyclists to secure their bike for the duration of their trip. ED's should look to provide cycle parking at all bus stops along the BusConnects Corridors where space permits. The minimum provision is 3 Sheffield Stands (accommodating 6 bicycles) in the vicinity of a bus stop. Where larger numbers of cyclists can be expected consideration should be given to providing a larger covered area of approximately 10 Sheffield Stands (accommodating 20 bicycles)."

As outlined in section 4.6.2.1 of Chapter 4, Proposed Scheme Description of Volume 2 of the EIAR, relevant design standards have been adhered to in relation to footpath widths.

"DMURS defines the absolute minimum footpath width for road sections as 1.8m based on the width required for two wheelchairs to pass each other. Building for Everyone: A Universal Design Approach (NDA 2020), defines acceptable minimum footpath widths at specific pinch points as being 1.2m wide over a two-metre length of path."

Consequently, it is anticipated that cycle stands will be provided at bus stops where minimum unimpeded footpath widths will be achieved.

2.9.6.5 Impact of the proposed development on the N3

Proposed Diverge Lane Design

Summary of issue

The submissions stated that there is concern with the proposed alterations to the existing diverge lane between the Mill Road Bridge and access road to James Connolly Hospital.

The submissions stated that it appears from the drawings that the taper diverge lane is being foreshortened due to the proposed new bus lane. The submission noted that this is likely to result in traffic weaving, road safety and operational issues at this location. The submissions requested that the length of the existing diverge taper lane be retained as close to its existing configuration as possible, and that the existing overhead sign gantry be retained at approximate chainage A1750.

Response to issue

The Proposed Scheme has retained the principles of the existing diverge layout. The proposed diverge taper will reduce from 94m long to 80m long as a result of the Proposed Scheme, for an urban area of 80 km/h speed limit (refer to Figure 2.9.39). There are no significant changes to how the junction will perform operationally. In addition, the Stage 1 road safety auditor did not raise this issue as a 'problem' as part of the Stage 1 road safety audit.

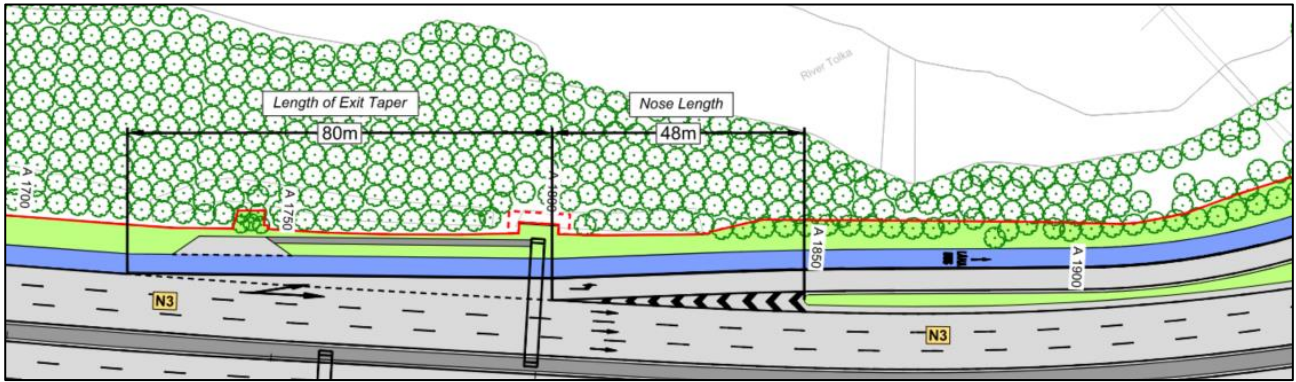


Figure 2.9.39: Proposed Diverge Layout on approach to James Connolly Hospital access road

In addition, the Stage 1 road safety auditor did not raise this issue as a ‘problem’ as part of the Stage 1 road safety audit.

Potential use of bus lanes by Cyclists

Summary of issue

The submission stated BusConnects will improve cycle facilities on the city side of the N3/M50 interchange. It noted that with improved cycle infrastructure there is potential for increased cycling demand to/from nearby areas in northern Dublin 15 such as Sports Campus Ireland, the Institute of Technology Blanchardstown, corporate business parks, residential areas, and Connolly Hospital Blanchardstown.

FCC noted they would have concerns with the suitability of the N3 mainline to be used by cyclists.

The submission supported the proposal for a 60 km/h speed limit on the new bus lanes on the N3 and noted this may require a bye-law.

It is noted that active travel infrastructure, as defined in the NTA’s GDA cycle network plan, would be safer and would likely prove more attractive to cyclists if in place. The submission considered that alternatives parallel to the N3, such as the proposed Tolka Valley Greenway and the proposed improvements through Blanchardstown village would be more appropriate.

Response to issue

As noted in section 4.2 of Chapter 4 of Volume 2 of the EIAR:

“The proposed route of the cycle track will integrate with route 4A of the GDA Cycle Network Plan via Castleknock Manor and the cycle track will recommence at Snugborough Road junction.”

Section 4.5 of Preferred Route Option Report states:

“Route 4A also provides connectivity with the Royal Canal Greenway for safe access and cycle facilities on the north side of the N3. It is deemed inappropriate to provide a cycle track between Snugborough Road Junction and Auburn Avenue Junction along the N3, due to engineering constraints of realigning a section of the N3 to facilitate an additional 3 metres of cycle track, with an associated safety buffer, the higher speeds of vehicles and a lack of trip attractors along this section, and safety concerns regarding encouraging cyclists on to the M50 Roundabout and on to a National Primary Route.”

The proposed Tolka Valley Greenway as per the GDA Cycle Network Plan will facilitate a future link between Connolly Hospital and its environs with the Royal Canal Greenway; refer to Figure 2.9.40. The progression of that plan is outside the scope of the CBC Scheme.

Fingal County Council’s website notes that the Royal Canal Greenway is to be submitted for Planning Approval in 2023.

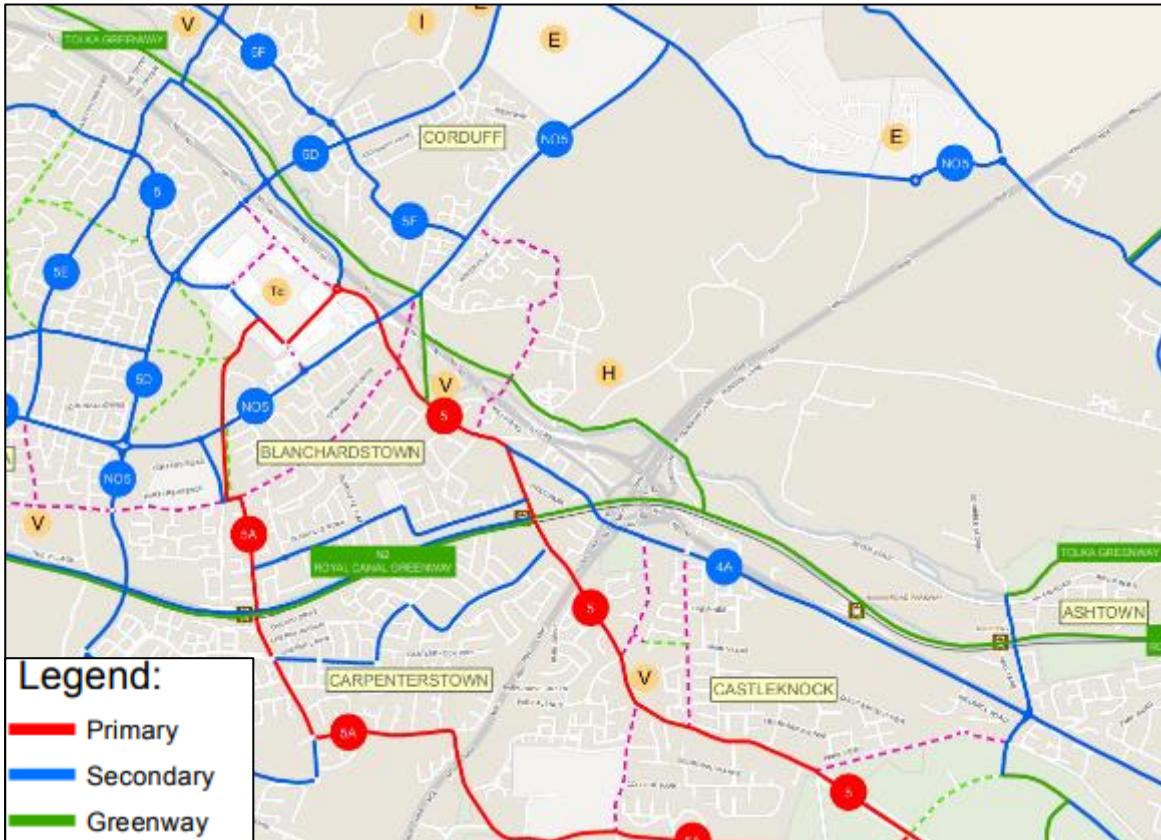


Figure 2.9.40: Extract from GDA Cycle Network Plan

2.9.6.6 Blanchardstown Town Centre – Transportation

Summary of issue

FCC stated that the proposed bus interchange at the town centre will enhance connectivity and public transport usage and it is important that the final layout is optimised to maximise user comfort and safety. FCC raised the following points:

1. There are several roads that are not currently in public ownership, and it is not clear how enforcement of bus lanes and additional traffic signage and road marking will be carried out.
2. The proposed extent of the circulatory road and interchange to be under public control should have a speed limit of not more than 50km/h but 30km/h will be more suitable at locations where there are pedestrians or cyclists crossing. A lower speed limit is more desirable given that the bus interchange and future developments are likely to significantly reduce car dependency in the longer-term.
3. The retention of the bus lane from the proposed bus interchange to the bus only on-ramp at the Blanchardstown N3 interchange should be considered to allow for better management of the bus lane.
4. The location of cycleways and the crossing for cyclists at junctions should be designed to improve priority and safety for cyclists. Cyclists crossing the junction of the N3 Slip Road with the Old Navan Road have to cede priority to two vehicular lanes within a short distance, which is not in line with best practice.
5. The junction of Blanchardstown Road South and Blakestown Way contains a number of multi-stage pedestrian crossings routed across a number of cycle, bus and traffic lanes. A tighter junction arrangement, more consistent with the principles of DMURS, may be appropriate here, as in the absence of suitable signal timings at this location to prioritise the more sustainable modes such as walking and cycling, there may be significant crossing and wait times for pedestrians and cyclists.

6. The Blanchardstown Road South (Mulhuddart Interchange) N3 bridge crossing has a wide, unused kerbed central reservation. FCC has previously requested that the possibility of converting that median to a traffic lane be investigated, to allow the traffic lanes to be shifted northwards and to facilitate a wider footpath and cycle lane on the southern side of this bridge.
7. Some 34 Sheffield stands for cycle parking are proposed at the Blanchardstown Town Centre Interchange which seems very low for such a major facility. It is considered that as well as additional Sheffield stands, a suitable number of covered, secure parking stands should also be provided as it would be more attractive to potential users including in particular all-day users.

Response to issue

The below responses are numbered to align with the above points raised.

1. The Blanchardstown Shopping Centre is currently served by public transport services operating on roads not taken in charge by Fingal County Council. Traffic enforcement for areas of carriageway and associated footpaths and verges in Blanchardstown Shopping Centre not ‘taken-in-charge’ by the local authority are and will continue to be managed by Blanchardstown Shopping Centre Management Company.
2. As shown on Traffic Signs and Road Markings drawings in Volume 3 of the EIAR and as noted in section 4.4 of the Preliminary Design Report, *for most cases along the urban CBC network, the existing speed limits will be retained with the exception of the Bus Interchange at Blanchardstown, and the Navan Road / Old Cabra Road junction to Ellis Quay section of the CBC, with a proposed speed limit of 30 km/h in each location. A 350m section of the R147 from Phoenix Park Avenue junction to Ashtown junction will also see a reduction in speed limit to 50 km/h from 60 km/h in conjunction with a change in road classification from urban dual to urban single carriageway.*

As shown on the Typical Cross Sections Drawings in Volume 3 of the EIAR, the proposed traffic lane width of 3.0m on Blanchardstown Road South will be retained. The specified lane widths are intended as an effective traffic calming measure.

Pedestrian and cyclist provisions are deemed to be reflective of the proposed speed limits in the area with segregated facilities and signalised crossings fundamental to the design.

Giving due consideration to the National Cycle Manual (section 1.7.4: Guidance Graph), raised cycle lanes/tracks (with vertical and horizontal segregation) are proposed to adequately segregate cyclists from traffic. Crossing locations for cyclists and pedestrians are incorporated at signalised junctions/crossings providing a positively controlled environment. The design therefore ensures there are no instances of uncontrolled crossing locations traversing the main carriageways in this area. Additionally, good inter-visibility exists at the crossing locations between drivers and pedestrians.

3. It is unclear what the submission is referring to. However, it is assumed the comment may relate to the bus lane that was indicated on the emerging preferred route drawings across the N3 overbridge on Blanchardstown Road North (refer to Figure 2.9.41).

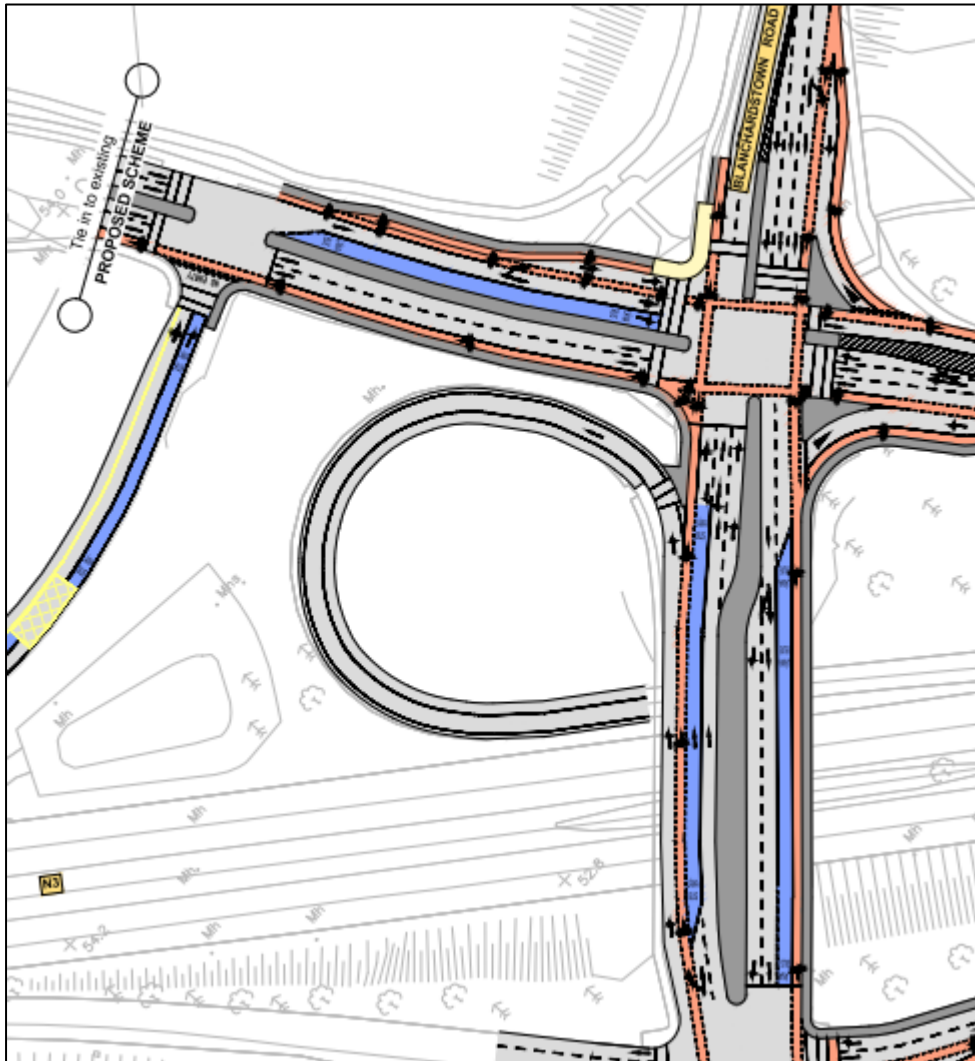


Figure 2.9.41: Extract from Emerging Preferred Route Drawing

The proposed traffic lane configuration on the Blanchardstown Road North bridge over the N3 dual carriageway is considered to provide an appropriate traffic management solution, with buses given priority on the upstream N3 slip road, and then turning right towards Blanchardstown Road North. Refer to Figure 2.9.42 below.

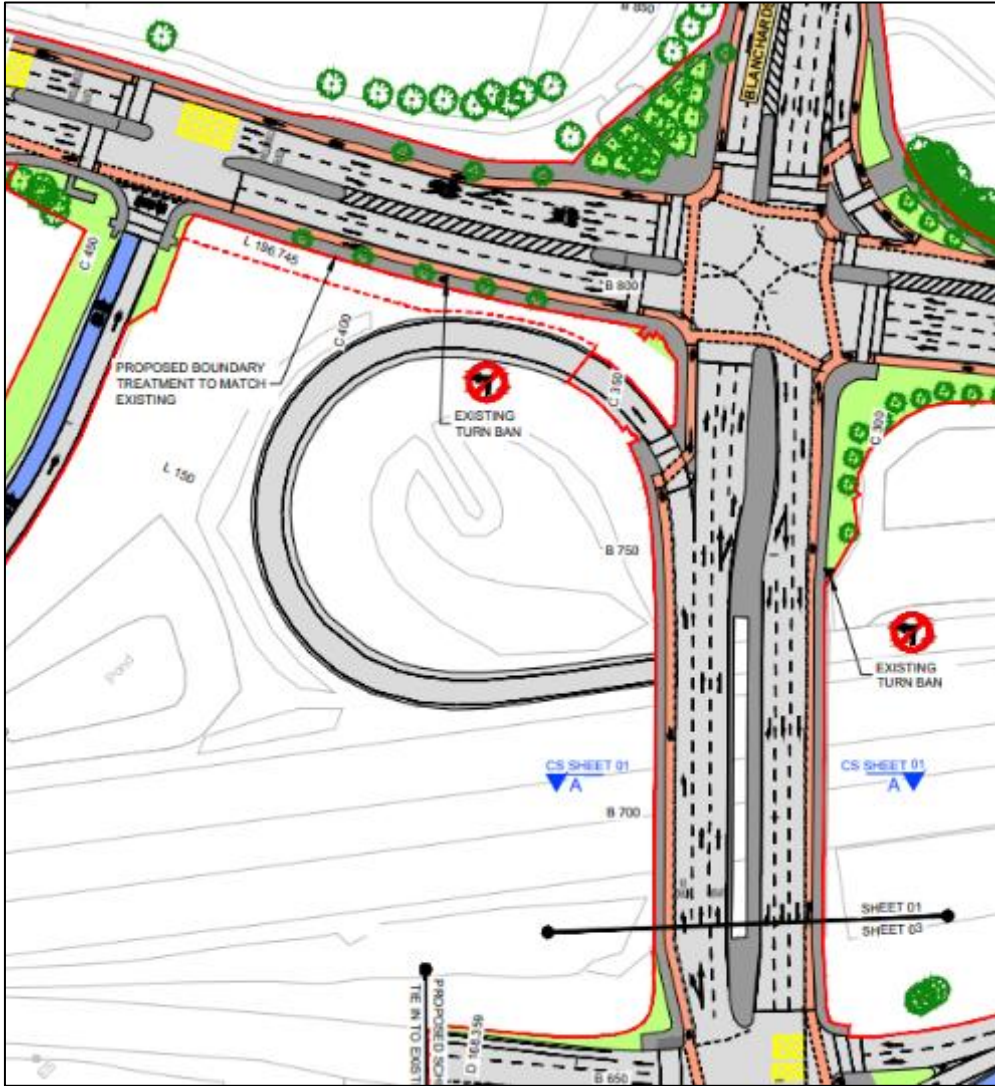


Figure 2.9.42: Extract from General Arrangement Drawing

4. As noted in section 4.5.1.1 of Chapter 4 Proposed Scheme Description of Volume 2 of the EIAR and as shown on General Arrangement drawings in Volume 3 of the EIAR:

At the junction of Blanchardstown Road North / Old Navan Road, it is proposed to introduce a protected style junction to enhance safety for cyclists. Proposals for the N3 on-slip junction, immediately to the south of this junction, include for the provision of a left turn filter lane with the northbound cycle track being moved to alongside the verge. Refer to Figure 2.9.43.

This layout provides for two separate crossings of the slip road, to replace the current single and much longer cycle crossing and provides good visibility for cyclists waiting to cross.

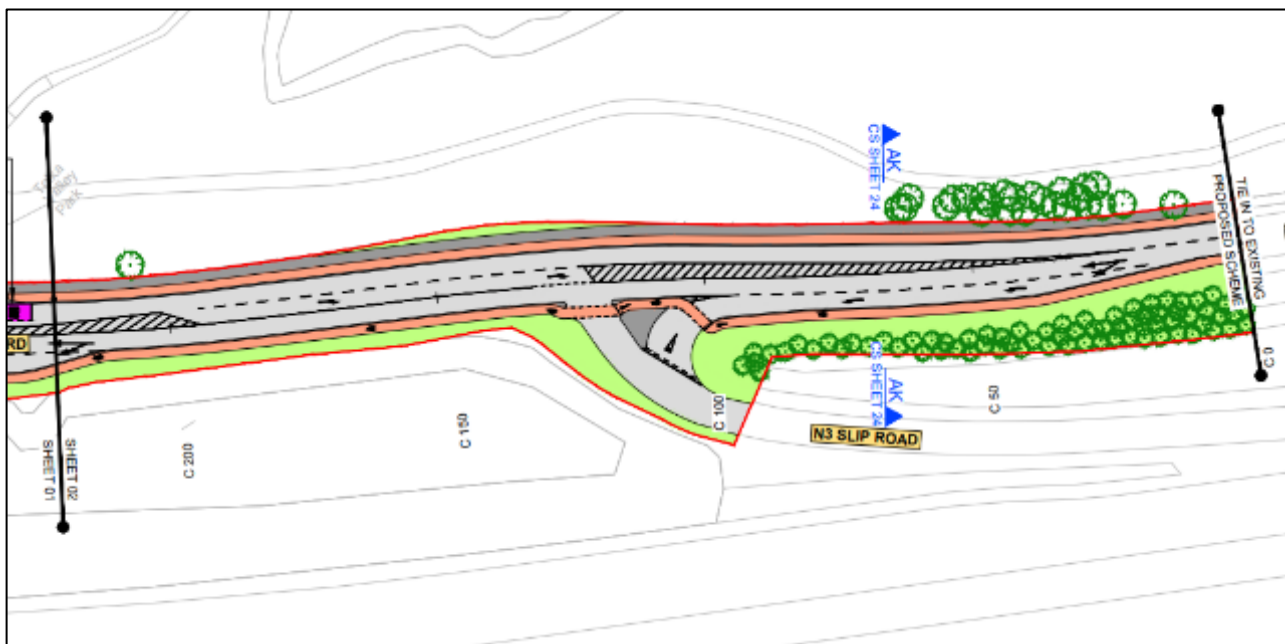


Figure 2.9.43: Extract from General Arrangement Drawing



Figure 2.9.44: Streetview image of existing layout at N3 on-slip junction (@2022 google)

5. The general arrangement of this junction needs to balance the management of traffic at this busy suburban junction adjacent to the shopping centre with provision of safe crossing facilities for pedestrians and cyclists, and the need to provide buses with reliable journey times to and from the bus interchange. To meet these needs and due to the multi-lane nature of the approach roads staggered crossings will be utilised at this location.

The left turn filter bus lane will allow a high degree of priority of buses which will include a regular flow of buses returning from the layover spaces on Blanchardstown Road South to the bus interchange. A left turn filter traffic lane from Blanchardstown Road South towards the shopping centre has been provided to facilitate the movement of traffic towards the shopping car parks. A pedestrian island has been provided between the left-turn lanes and straight-ahead lanes on Blanchardstown Road South – to provide pedestrians and cyclists with a safe crossing of the bus lane – while also providing a high level of priority for buses.

In addition, it should be noted that there are direct crossings to the north and east of the junction (approximately 150m and 100m from the nearest crossing respectively).

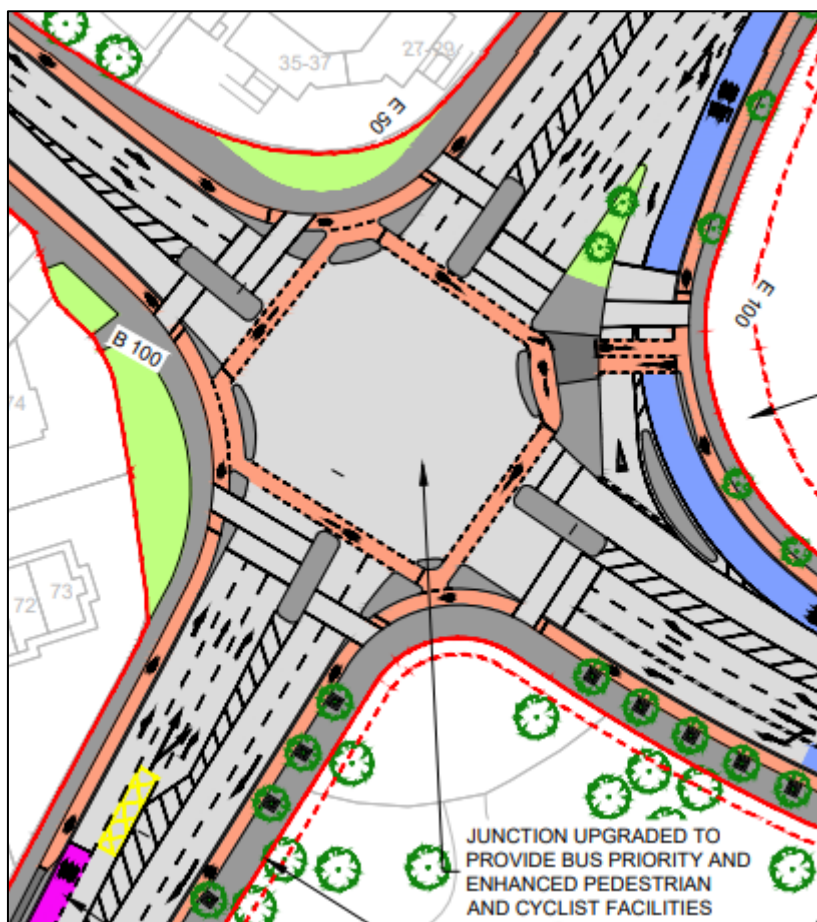


Figure 2.9.45: Extract from General Arrangement Drawing

6. A 1.9m wide footpath is being retained along the southern side of the carriageway.

As noted in section 5.8 Footpath Widths of Appendix A4.1 PDGB of Volume 2 of the EIAR:

“2.0m is the desirable minimum width for a pedestrian footpath. 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.”

Retention of the existing 1.9m wide footpath provides a facility which is above the absolute minimum width of 1.8m; this is considered appropriate and safe at this location which is suburban in nature.

As noted in section 5.3 Cycle Track Width of Appendix A4.1 PDGB of Volume 2 of the EIAR:

“The desirable minimum width for a single-direction, with-flow, raised-adjacent cycle track is 2.0m. This arrangement allows for two-abreast cycling. Based on the National Cycle Manual (NCM) Width Calculator (see Figure 7); this allows for overtaking within the cycle track. The minimum width is 1.5m, which, based on the NCM Width Calculator, allows for single file cycling. Localised narrowing of the cycle track below 1.5m may be necessary over very short distances to cater for local constraints (e.g. mature trees).”

As noted in Table 4.3 of Chapter 4 Proposed Scheme Description of Volume 2 of the EIAR;

“Cross section has been developed to match the existing across the overbridge structure to minimise any impact. It should be noted that the PDGB acknowledges a reduction in cycle track width to 1.5m is permitted as the absolute minimum.”

The length of cycle lane across the overbridge is approximately 100 m.

In addition, industry-standard cycle lane separators will be provided to provide segregation from adjacent traffic instead of kerbed segregation due to existing bridge deck details.

It is noted that the design meets the objectives of the Proposed Scheme and does not preclude any future scheme of converting the median to a traffic lane.

Refer to Figure 2.9.46 which shows the cross section on the overbridge.

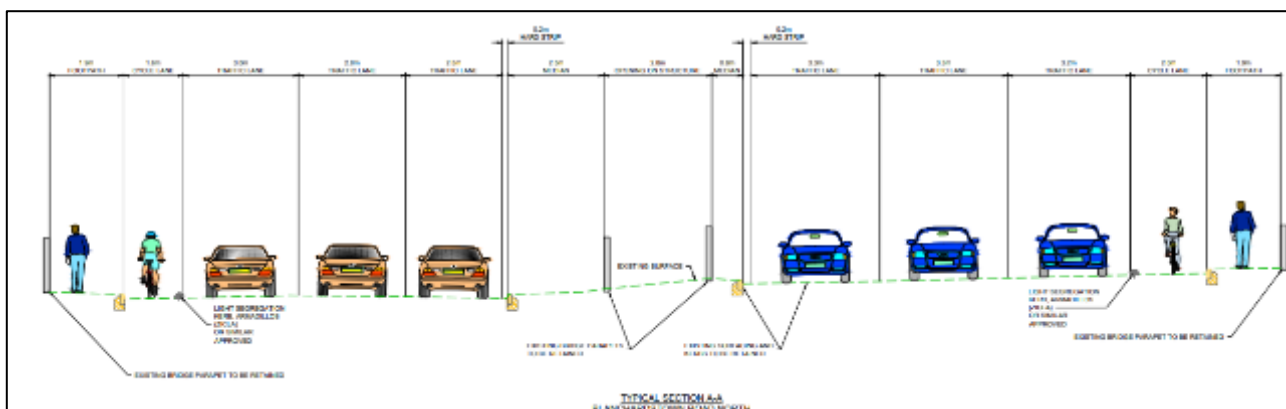


Figure 2.9.46: Cross-section on Blanchardstown Road North overbridge

- 34 cycle stands will be provided adjacent to the Bus Interchange western access. In addition, 13 cycle stands will be provided adjacent to the Bus Interchange eastern access. Cycle stands will be provided in close proximity to cycle tracks and where space permits. In addition, there are existing cycle parking facilities within the shopping centre site.

2.9.6.7 Blanchardstown Town Centre – Public Realm

Summary of issue

The submission noted that the new interchange is an opportunity to enhance the experience of the public and to encourage greater usage of bus services. It stated that it is important that the design of the structures and public realm works enhance the visual qualities of the area and materials, street furniture and landscaping assist in giving priority to pedestrians, cyclists and public transport.

The submission stated that materials used should be durable, conducive to the open nature of the development and appropriate to the site context which currently lacks enclosure and is dominated by hard surfacing. The submission expressed concern with the durability and weathering of the proposed materials for the structures, noting that the use of green roofs is a positive feature and timber seating will soften the appearance of structures.

FCC stated that maintenance of planting is desired in greening the area and maintaining its attractiveness to the public. It recommended that paving type used should improve the aesthetics and the structures materials should maximise the visual qualities of the scheme.

Response to issue

The design for the bus interchange has been conceived to provide a high quality and visually appealing public space. This focus on quality extends into the material choices made, which reflect tried and tested finishes that is used in public spaces in Ireland and abroad. Central to the selection of street furniture and finishes has been the functional and aesthetic qualities of materials, to be both durable and weather resistant, and aesthetically appealing. Items such as street furniture, will be a part of a family of components to have visual continuity in terms of style, and finish. Seating, in particular, will be durable and inviting, and timber finishes will provide not only a warm texture and attractive appearance that is comfortable, but an intrinsically sustainable one too. Seat finishes have been considered to be of a treated hardwood construction with metal framing to provide a robust backing at the individual bus shelters. In more exposed areas, the timber finish will be combined with mass concrete backings. It is envisaged that all materials and constructions will be prototyped and reviewed for durability and weather resistance prior to final implementation of the design solution.

The Blanchardstown Shopping Centre site including the public realm landscaping will be maintained by the Management Company.

2.9.6.8 *R147 Navan Parkway Interchange*

Summary of issue

The submission stated that the layout of bus lanes at the overbridge junctions should be designed to minimise delays for all users and the retention of a shared left turn lane should be considered.

Response to issue

As noted in TIA Sub-Appendix 2 Junction Design Report of Volume 4 of the EIAR, the junctions are noted as a Type 1 junction and it is proposed that the bus lane will continue to the stop line of both the eastbound and westbound junctions – to maximise bus priority through the junctions. The bus lane stop lines will be marginally set back against the adjacent traffic lane, to ensure visibility of primary signals from the general traffic lane.

This aligns with one of the objectives of the Proposed Scheme, as noted in section 1.2 of Chapter 1 of Volume 2 of the EIAR, 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.*

As noted in Appendix A4.1 PDGB of Volume 4 of the EIAR, the junction is based on a Type 1 layout as the volume of left turning vehicles will be greater than 100 PCUs per hour and no space is available for a dedicated left turning lane.

2.9.6.9 *Drainage*

Summary of issue

FCC noted that the Flood Risk Assessment (FRA) summarised the entirety of the CBC to be at low risk of fluvial flooding, low risk of tidal flooding from the River Liffey and low risk of groundwater flooding.

FCC noted that the FRA noted the pluvial flooding risk along the route is high and would be reduced as a result of the Proposed Scheme, acknowledging that this is an improvement on the existing infrastructure. FCC welcomed new Sustainable Urban Drainage Systems (SuDS) features such as rain gardens, swales and tree pits, which will provide storage and reduce risk of pluvial flooding.

FCC stated they promote the implementation of nature-based solutions to the management of rainwater and surface water runoff in urban areas wherever possible and further detailed SuDS design should continue to be aligned with the principles of the best practice interim guidance document from the Department of Housing, Local Government and Heritage “*Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, March 2022.*”

FCC stated that they received the River Tolka Flood Study Hydrology and Hydraulics Summary Report (McCloy) in July 2022 in support of the Fingal Development Plan 2023 – 2029 and noted that this report is available for the NTA in continuance of its flood risk assessment of the Proposed Scheme.

Response to issue

As noted in section 4.6.14.1 of Chapter 4 of Volume 2 of the EIAR:

“The design basis statement was developed whilst taking the Greater Dublin Regional Code of Practice (GDRCoP), Greater Dublin Strategic Drainage Study (GSDSDS), Planning requirements of Local Authorities within the Dublin region, Transport Infrastructure Ireland (TII) requirements and international best practices such as CIRIA The SuDS Manual (C753) (CIRIA 2015).”

As noted in section 2.1 Relevant Standards and Guidance of Appendix K Drainage Design Basis of the Preliminary Design Report in the Supplementary Information:

“It is noted that the purpose of this report is to complement, and not supersede, existing guidance documents relating to the design of drainage in Greater Dublin. A non-exhaustive list of these guidelines is outlined below:

- *Greater Dublin Regional Code of Practice (GDRCoP)*
- *Greater Dublin Strategic Drainage Study (GSDSDS)*
- *CIRIA The SuDS MANUAL (C753)*
- *DCC Drainage Planning Section for schemes running completely through greenfield sites”*

The Proposed Scheme will also take cognisance of “Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, March 2022” document where practicable.

The NTA acknowledge receipt of the River Tolka Flood Study Hydrology and Hydraulics Summary Report (McCloys).

Following a review of this report, the following is noted:

- **Snugborough Road Bridge:** The assessment indicated 4.68m OD freeboard in a Q100 flood based on the 2002 River Tolka Flood study. The latest report does not give a level of detail wherein a freeboard assessment can be undertaken however it does note that the embankment upstream of the culvert provides a standard of protection (SOP) of 1% AEP – i.e. the 1 in 100 year return period. Further, there is no flooding of the route shown on the flood maps for this location.
- **BR01_Tolka Bridge:** The original assessment indicated 0.3m OD freeboard at the upstream end of the culvert in a Q100 flood based on the 2002 River Tolka Flood study. The latest report indicates that Q100 does not breach the road level however the Q1000 does cause some road flooding. The depth of this flooding is not provided. A Justification Test for the Flood Risk Assessment (FRA) has been carried out as required and it is confirmed that it passes the requirements, as the route is on an established National Road and the risk of flooding would not be made worse by the Proposed Scheme.

McCloy Consulting have provided revised flood levels at the upstream and downstream face of this bridge. The revised upstream level exceeds the existing soffit of the bridge however there remains approximately 2.5m clearance to the road level. The flood level has reduced on the downstream face, where the widening works are proposed. Thus, the impact of the proposed extension is unchanged from that shown in the original FRA and associated Section 50 application.

- **Blanchardstown Bypass Bridge.** The assessment indicated a freeboard of 0.17m OD upstream of the culvert in a Q100 flood based on the 2002 River Tolka Flood study. The latest report does not indicate any road flooding. The freeboard cannot be determined from the report. The route itself would be in Flood zone C so it does not require a Justification test. There are no works planned for this bridge. Results of the assessment are effectively unchanged.

2.9.6.10 Conclusion

Summary of issue

FCC stated they welcome the decision to progress with the Proposed Scheme and believe that it will deliver significant benefits to Dublin 15, Fingal and the wider Dublin region. They stated that there are certain areas that require further consideration, as set out in the foregoing, and they look forward to working with the Bord and the NTA to assist in the delivery of this key piece of transport infrastructure.

Response to issue

The NTA welcomes the comments in support of the Proposed Scheme and will continue the very positive liaison with Fingal County Council through the delivery phase, subject to statutory approval of the application.

2.9.7 National Asset Management Agency

2.9.7.1 Overview of Submission

The submission raised the following issues:

- Support for the Proposed Scheme
- Alignment with other projects
- Bus Stop Locations
- Bicycle Parking
- Navan Road Parkway Station Cycle Infrastructure
- Bus Connects Network Review

2.9.7.2 Support for the Scheme

Summary of issue

The submission is made in the context of lands secured to the National Asset Management Agency (NAMA) at Scribblestown, Dunsink, which are approximately 400m north of the Navan Road, adjacent to Dunsinea Lane.

The submission noted that the Dunsink area has been earmarked by FCC for “development of a low-carbon mixed-use transit-orientated urban quarter which priorities active travel and public transport modes both within and outside, is well connected to the wider City via high quality public transport and active travel infrastructure and seeks to protect and enhance the environmental and historic character of the area.”

The draft Fingal Development Plan 2023-2029 identifies Dunsink for residential development, with significant community and employment infrastructure.

The submission noted that the Proposed CBC Scheme, in addition to the BusConnects Network Review and DART West + project will significantly increase the frequency and reliability of public transport services in the area.

The submission stated that the proposed upgrade to Ashtown Roundabout with associated enhanced pedestrian and cycle infrastructure will improve safety for cyclists and pedestrians, and serve to significantly improve connections to Blanchardstown, Dublin city and Phoenix Park by sustainable modes. The submission noted that the Proposed Scheme facilitates future cycle infrastructure along the Ashtown Road.

NAMA stated that the Proposed Scheme will bring significant benefits to accessibility of the north-western Dublin area, with the potential to enhance the sustainable connectivity of lands at Dunsink, assisting in achieving the national strategic outcomes of the National Planning Framework. This includes compact growth, sequential development and supporting new development.

Response to issue

The NTA welcomes NAMA’s comments in support of the scheme and the enhanced safety for pedestrians and cyclists that the Proposed Scheme will bring, along with improved connectivity via sustainable modes.

Section 2.1 Introduction of Chapter 2 Need for the Proposed Scheme of Volume 2 of the EIAR states the following:

“The delivery of the Proposed Scheme is supported by International, European Union, National, Regional and Local strategies, policies, and plans.”

Section 2.3 of Chapter 2 states the following:

“The Proposed Scheme, which is part of the BusConnects Dublin CBC Infrastructure Works, is a key measure that delivers on commitments within the National Development Plan (2021-2030), Transport Strategy for the Greater Dublin Area (2016-2035), Climate Action Plan (2021) and the Climate Action and Low Carbon Development (Amendment) Act 2021 (the 2021 Climate Act).”

2.9.7.3 Alignment with other projects

Summary of issue

The submission noted that the bus connectivity will be enhanced by the DART+ West proposals to remove the level crossing at Ashtown train station and provide an underpass for pedestrians, cyclists and vehicles.

The submission went on to state that the DART+ West scheme which is also with An Bord Pleanála (ABP) for consideration, should achieve full connectivity with the CBC scheme and ABP has been requested to review the CBC scheme in the context of the DART+ West scheme to ensure this will be achieved.

NAMA noted that this would align with FCC's vision and the National Strategic Outcomes (NSOs) of the National Planning Framework around compact growth, sequential development and public transport solutions.

The submission also requested for the proposed cycle tracks at Navan Road Parkway station to extend to the rail station building in order to provide a better solution.

Response to issue

NTA acknowledge the DART+ West proposals and confirm that works that are proposed are designed to ensure tie-in with the existing infrastructure at this location. There is no existing cycle provision at the tie-in point for the Proposed Scheme to tie into. While it would also be desirable to improve all surrounding areas, the Proposed Scheme has focussed improving facilities along the corridor, based on the scheme objectives. It is likely that future schemes, brought forward either by the relevant Local Authority or the NTA, will address these connections and the Proposed Scheme allows for this to happen at a future date.

2.9.7.4 Bus Stop Locations

Summary of issue

The submission stated that it would be beneficial for the proposed bus stops east of Ashtown Road junction to be moved further west, to avail of the additional space created by the removal of the roundabout and in turn reduce the distance of the stops from the Dunsink area, resulting in improvement in overall walking / cycling catchment.

Response to issue

Section 4.6.4.5 of Chapter 4 of Volume 2 of the EIAR notes the following:

“To improve the efficiency of the bus service along the Proposed Scheme the position and number of bus stops has been evaluated as part of a bus stop review.”

A review of existing bus stops along the route of the Proposed Scheme has been carried out and the findings are documented in Appendix H of the Preliminary Design Report contained in the Supplementary Information. The existing location of the bus stops in this location is deemed to be the optimum location in the context of the spacing of preceding and subsequent bus stops.

2.9.7.5 Bicycle Parking

Summary of issue

The submission requested the provision of cycle parking stands in the vicinity of proposed bus stop locations, or adjacent to Ashtown Road junction, to further enhance sustainable transport facilities in the area.

The submission went on to request additional cycle parking adjacent to Ashtown train station, to enhance connectivity through a potential future pedestrian / cycle bridge between Ashtown train station and Coolmine Rugby Club which is noted as Local Objective 90 of the draft Fingal Development Plan 2023-2029.

Response to issue

As noted in section 4.6.3.6 of Chapter 6 of Volume 2 of the EIAR, Cycle stands will be provided, where practicable, at island bus stops and key additional locations.

As outlined in section 4.6.2.1 of Chapter 4, Proposed Scheme Description of Volume 2 of the EIAR, relevant design standards have been adhered to in relation to footpath widths.

“DMURS defines the absolute minimum footpath width for road sections as 1.8m based on the width required for two wheelchairs to pass each other. Building for Everyone: A Universal Design Approach (NDA 2020), defines acceptable minimum footpath widths at specific pinch points as being 1.2m wide over a two-metre length of path. “

Consequently, 6 No. cycle stands are proposed adjacent to the inbound bus stop east of Ashtown Road as indicated on Landscaping General Arrangement drawings in Volume 3 of the EIAR.

2.9.7.6 Navan Road Parkway Station Cycle Infrastructure

Summary of issue

The submission requested for the proposed cycle tracks at Navan Road Parkway station to extend to the rail station building in order to provide a better solution.

Response to issue

While it would be desirable to improve all surrounding areas, the Proposed Scheme has focussed on the improving facilities along the corridor, based on the scheme objectives.

2.9.7.7 BusConnects Network Review

Summary of issue

The submission referred to the recent infrastructure feasibility study undertaken by FCC which acknowledges that direct public transport to the Dunsink area will be by bus.

The submission stated that this should be achieved through the provision of a bus route through the Dunsink lands via a branch of the B spine (similar to the proposed B3 branch), which can operate as an extension to the proposed CBC infrastructure.

Response to issue

Section 2.2.1.4 The Bus Network in Chapter 2 Need for the Proposed Scheme of Volume 2 of the EIAR states the following:

The final resulting Core Bus Network presented in the GDA Transport Strategy represents the most important bus routes within the Dublin Metropolitan Area, generally characterised by high passenger volumes, frequent services and significant trip attractors along the routes.

As noted in section 2.2.1.6 of Chapter 2:

“The radial Core Bus Corridors identified in the GDA Transport Strategy, as modified in the light of more detailed assessment, are to be delivered under the CBC Infrastructure Works. The CBC Infrastructure Works will deliver approximately 230km of dedicated bus lanes and 200kms of cycle tracks along 12 stand-alone Core Bus Corridor Schemes, which includes the Proposed Scheme.”

The CBC Infrastructure Works will typically run along existing trunk bus routes, connecting metropolitan urban centres along the route and the City Centre. While the termination point for the proposed CBC infrastructure improvements is at the Blanchardstown Shopping Centre, it does not preclude the expansion of the bus services beyond the Centre.

The provision and improvement of the bus services in the GDA is constantly under review by the NTA. The submission regarding the provision of a bus route through the Dunsink lands via a branch of the B spine (similar to the proposed B3 branch) has been forwarded to the appropriate NTA department.

2.9.8 Transport Infrastructure Ireland

2.9.8.1 Overview of Submission

The submission raised the following issues

- Support for the Proposed Scheme
- Proposed diverge lane between Mill Road Bridge and Access Road to James Connolly Hospital
- Potential use of bus lanes on N3 by cyclists

2.9.8.2 Support for the Proposed Scheme

Summary of issue

Transport Infrastructure Ireland (TII) stated that in principle they support the objectives of the Proposed Scheme and they would expect that the scheme can be developed in such a way as to address the concerns they have outlined below and avoid adverse impacts on the safety, security and operation of the national roads network and users of that network.

Response to issue

The NTA welcome TII's support for the scheme and respond below to the concerns they have raised.

2.9.8.3 Proposed diverge lane between Mill Road Bridge and Access Road to James Connolly Hospital

Summary of issue

The submissions stated that there is concern with the proposed alterations to the existing diverge lane between the Mill Road Bridge and access road to James Connolly Hospital.

The submissions stated that it appears from the drawings that the taper diverge lane is being foreshortened due to the proposed new bus lane. The submission noted that this is likely to result in traffic weaving, road safety and operational issues at this location. The submissions requested that the length of the existing diverge taper lane be retained as close to its existing configuration as possible, and that the existing overhead sign gantry be retained at approximate chainage A1750.

Response to issue

The Proposed Scheme has retained the principles of the existing diverge layout. The proposed exit taper will reduce from 94m long to 80m long as a result of the Proposed Scheme, for an urban area of 80 km/h speed limit (refer to Figure 2.9.47 below). There are no significant changes to how the junction will perform operationally. In addition, the Stage 1 road safety auditor did not raise this issue as a 'problem' as part of the Stage 1 road safety audit.

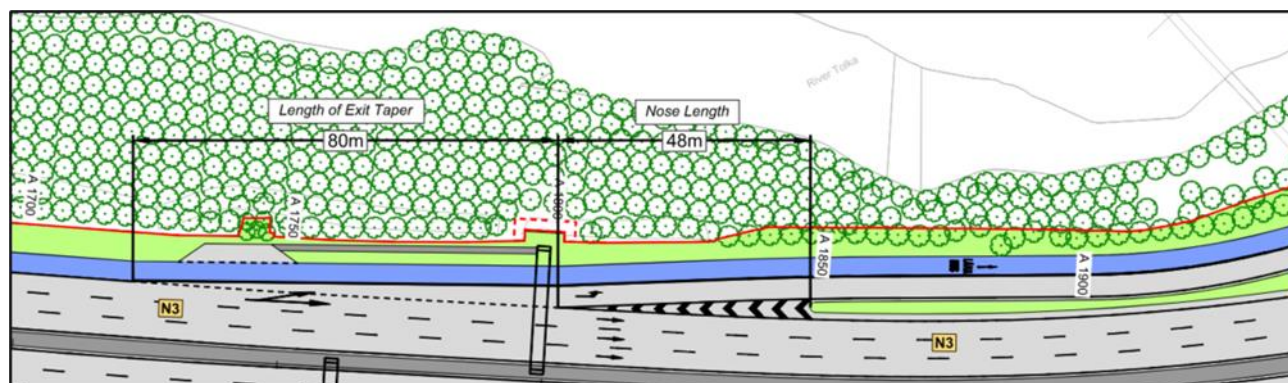


Figure 2.9.47: Proposed Diverge Layout on approach to James Connolly Hospital access road

2.9.8.4 Potential use of bus lanes on N3 by cyclists

Summary of issue

The submission stated BusConnects will improve cycle facilities on the city side of the N3/M50 interchange. It noted that with improved cycle infrastructure there is potential for increased cycling demand to/from nearby areas in northern Dublin 15 such as Sports Campus Ireland, the Institute of Technology Blanchardstown, corporate business parks, residential areas, and Connolly Hospital Blanchardstown.

TII is of the view that cyclists, who would expect to travel between these locations and the existing and emerging active travel networks in the region of the N3/M50 interchange, may attempt to use the proposed BusConnects bus lanes on the N3. It is the opinion of TII that high quality segregated active travel infrastructure, as defined in the NTA's GDA cycle network plan, would be safer and would likely prove more attractive to cyclists if in place. TII consider that alternatives parallel to the N3, such as the proposed Tolka Valley Greenway and the proposed improvements through Blanchardstown village would be more appropriate in the interests of public safety and also to encourage active travel modes.

TII is also of the view that such parallel cycle infrastructure alternatives would need to be in place prior to the opening of the BusConnects corridor. This would minimise the risk of cyclists choosing to cycle in the high-speed traffic environment of the N3 and also encourage modal split. In this regard, it would be important that appropriate directional signage to these alternative active travel routes is provided as part of the Blanchardstown to City Centre Core Bus Corridor Scheme.

Response to issue

As noted in section 4.2 of Chapter 4 of Volume 2 of the EIAR:

“The proposed route of the cycle track will integrate with route 4A of the GDA Cycle Network Plan via Castleknock Manor and the cycle track will recommence at Snugborough Road junction.”

Section 4.5 of Preferred Route Option Report states:

“Route 4A also provides connectivity with the Royal Canal Greenway for safe access and cycle facilities on the north side of the N3. It is deemed inappropriate to provide a cycle track between Snugborough Road Junction and Auburn Avenue Junction along the N3, due to engineering constraints of realigning a section of the N3 to facilitate an additional 3 metres of cycle track, with an associated safety buffer, the higher speeds of vehicles and a lack of trip attractors along this section, and safety concerns regarding encouraging cyclists on to the M50 Roundabout and on to a National Primary Route.”

The proposed Tolka Valley Greenway as per the GDA Cycle Network Plan will facilitate a future link between Connolly Hospital and its environs with the Royal Canal Greenway; refer to Figure 2.9.48. The progression of that plan is outside the scope of the CBC Scheme.

Fingal County Council's website notes that the Royal Canal Greenway is to be submitted for Planning Approval in 2023.

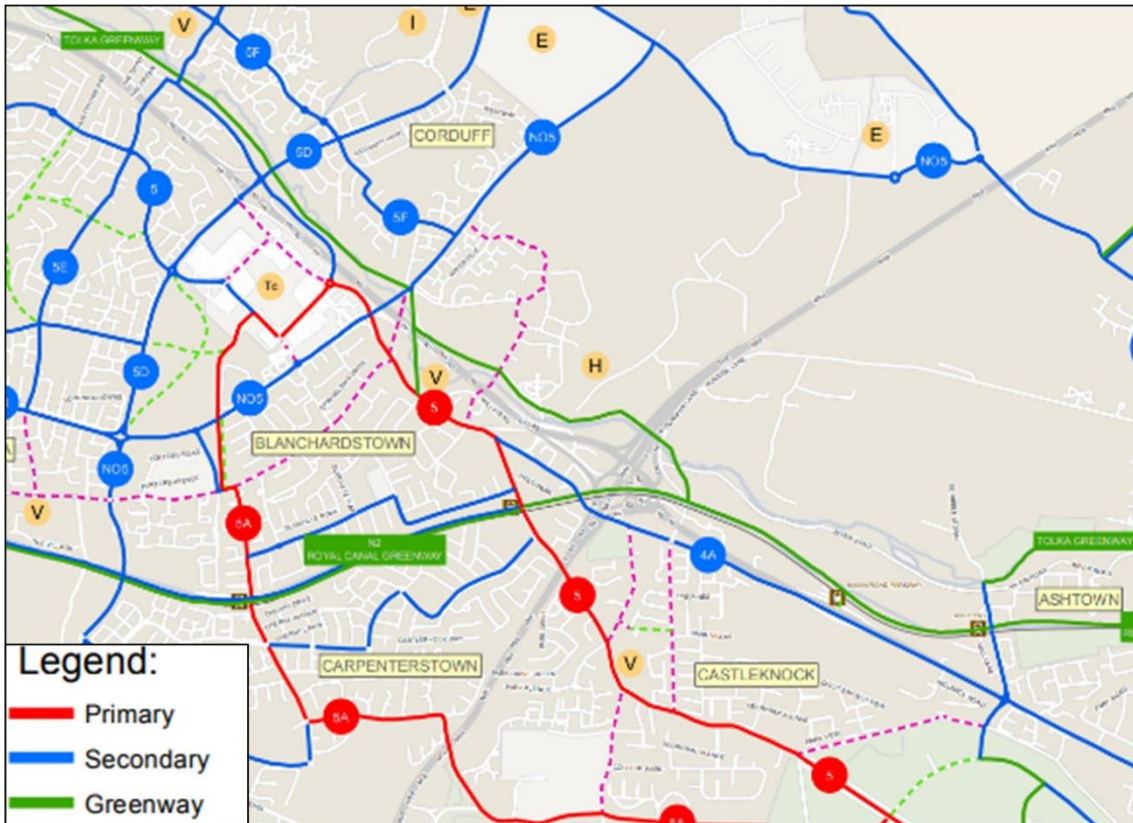


Figure 2.9.48: Extract from GDA Cycle Network Plan

2.9.9 Inland Fisheries Ireland (IFI)

2.9.9.1 Summary of submission

The submission stated that the Proposed Scheme will interact with the Tolka River which supports Atlantic Salmon, Lamprey (Habitats Directive Annex II Species) and Brown Trout populations in addition to other species. The submission noted that salmonid waters constraints apply to a development in this area.

The submission stated that pollution of the adjacent fresh waters from poor on-site construction practices could have a significantly negative impact on the fauna and flora of this surface water system. It was noted that a comprehensive and integrated approach for achieving river protection during construction and operation should be implemented through environmental construction management planning.

The submission acknowledged that all works will be completed in line with the Construction Environmental Management Plan (CEMP) 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.

The submission affirmed that ground preparation and associated construction works have significant potential to cause the release of sediments and pollutants into the surrounding watercourses.

The submission stated that any dewatering of ground water during excavation works must be treated by infiltration over land or into an attenuation area before being discharged off site.

The submission noted that as concrete, cement, and other construction materials can be highly toxic to aquatic life, these materials should be strictly controlled and monitored with appropriate licencing where applicable.

The submission stated that surface water management (SuDS approach) should not result in a deterioration of water quality or habitat in natural river / stream channels or any receiving waterbody. All hard surfaces must be impermeable and allow no seepage of oil or other potential harmful liquids to groundwater.

The submission noted that measures outlined in the EIAR should be strictly adhered to and a strict monitoring regime be put in place. It recommended that the “*Guidelines on protection of fisheries during construction works in and adjacent to waters*” (2016) should be consulted when planning to undertake works in the vicinity of surface waters.

IFI requested that if the Proposed Scheme proceeds that they be consulted directly on all matters concerning fisheries and surface water. It was also requested that reporting of groundwater and surface water monitoring data be extended to IFI on a scheduled basis.

2.9.9.2 *Response to submission*

Chapter 13 Water in Volume 2 of the EIAR assesses the impact of the Proposed Scheme on the surface water environment during both the Construction and Operational Phases. Section 13.3.3 sets out that the following Water Framework Directive (WFD) water bodies within the study area are included in the assessment.

- Powerstown (Dublin)_10;
- Tolka_030;
- Tolka_040;
- Tolka_050;
- Liffey Estuary Upper; and
- Royal Canal Main Line (Liffey and Dublin Bay).

Section 13.4 presents potential impacts that may occur due to the Proposed Scheme, both during the construction and operational phases.

Table 2.9.10 (as taken from table 13.14 of Chapter 13) summaries the potential construction phase impacts on the WFD water bodies in the study area, and outlines the significance of effects for each project activity:

Table 2.9.10: Summary of Potential Construction Phase Impacts on Water bodies within the Study Area

Water body Name	Project Activity	Potential Impacts			
		Description of Potential Impacts	Sensitivity of Receptor	Magnitude of Impacts	Significance of Effects
Tolka_040	Road widening of the N3 Dual Carriageway	Increased surface water runoff; Increased sediment in runoff; Anthropogenic sources (fuel etc.)	High	Small	Moderate/Slight Short-term, Adverse
Tolka_040	Construction Compound BL1 Old Navan Road Car Park	Increased surface water runoff; Increased sediment in runoff; Anthropogenic sources (fuel etc.)	High	Large,	Profound Short to medium term Adverse
Tolka_040	BR01 Tolka Bridge Extension	Silty water runoff Oil spills	High	Large	Profound Short term, Adverse
Tolka_040	RW07A and RW07B Pedestrian Ramps and BR02 Mill Road Bridge	Silty water runoff Concrete washings	High	Moderate	Significant Short term Adverse
Tolka_050	Construction Compound BL2 at Junction 6 West of M50	Increased surface water runoff; Increased sediment in runoff; Anthropogenic sources (fuel etc.)	High	Small	Moderate/Slight Short to medium term Adverse
Tolka_050	Construction Compound BL3a at R147 East of the M50	Increased surface water runoff; Increased sediment in runoff; Anthropogenic sources (fuel etc.)	High	Moderate	Profound/Significant Short to medium term Adverse
Tolka_050	Construction Compound BL3b at R147 East of the M50	Increased surface water runoff; Increased sediment in runoff; Anthropogenic sources (fuel etc.)	High	Small	Moderate/Slight Short term Adverse
Tolka_050	Construction of new bus lane from M50 roundabout	Increased sediment in runoff	High	Small	Moderate/Slight Short term Adverse
Royal Canal Main Line (Liffey and Dublin Bay)	Widening of Navan Road	Increased sediment in runoff	Very High	Small	Significant/ Moderate Short term Adverse
Liffey Estuary Upper	Road widening and junction improvements	Increased surface water runoff; Increased sediment in runoff; Anthropogenic sources (fuel etc.)	Very High	Negligible	Imperceptible Short Term Adverse
Dublin Zoo Ponds	Road widening and junction improvements	Increased surface water runoff; Increased sediment in runoff; Anthropogenic sources (fuel etc.)	Medium	Moderate	Moderate Short term Adverse

Section 13.4.5.2 of Chapter 13 presents the assessment of the potential surface water runoff impacts for the operational phase.

Detailed assessments for each receptor are provided below.

It states the following in relation to Tolka_040:

“The impermeable area in the road corridor area draining to the Tolka_040 increases by 19,679m² which equates to a 34% increase. This increase in impermeable area will be attenuated using bio retention/rain garden areas, permeable paving, tree pits, filter drains oversized pipes and green roofs. As a result, there will be no net increase in runoff to the water body.

Some improvement in water quality may be observed as a result of the SuDS being employed. This has the potential to lead to permanent, beneficial impacts of negligible magnitude; resulting in an impact of Imperceptible significance.”

In relation to Tolka_50 it states the following:

“The impermeable area in the road corridor area draining to the Tolka_050 increases by 1,892m² which equates to a 46% increase. There is limited impermeable area draining to this water body and so the percentage appears high, albeit the increase is small compared to other catchments. This increase in impermeable area will be attenuated using bio retention/rain garden areas, filtration drains and swales. As a result, there will be no net increase in runoff to the water body. Some improvement in water quality may be observed as a result of the SuDS being employed. This has the potential to lead to permanent, beneficial impacts of negligible magnitude; resulting in an impact of Imperceptible significance.”

Section 13.5 of EIAR Chapter 13: 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.

In relation to Royal Canal Main Line (Liffey and Dublin Bay), it states:

“The impermeable area in the road corridor area draining to the Royal Canal increases by 5,376m² which equates to a 23% increase. This increase in impermeable area will be attenuated using bio retention/rain garden areas, tree pits, filtration drains and oversized pipes. As a result, there will be no net increase in runoff to the water body. Some improvement in water quality may be observed as a result of the SuDs being employed. This has the potential to lead to a permanent, beneficial impact of negligible magnitude, resulting in an impact of Imperceptible significance.”

In relation to Dublin Zoo Ponds, the following is noted:

“The impermeable area in the road corridor area draining to the Dublin Zoo ponds increases by 2,679m², which equates to a 15% increase. This increase in impermeable area will be attenuated using filtration drains, tree pits and oversized pipes. As a result, there will be no net increase in runoff to the ponds. Some improvement in water quality may be observed as a result of the SuDs being employed. This has the potential to lead to permanent, beneficial impacts of negligible magnitude; resulting in an impact of Imperceptible significance.”

Construction phase mitigation measures are described in section 13.5.2.1 as follows:

“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. 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.*

Following implementation of the general mitigation measures, the majority of impacts will be not significant. However, there are some construction activities at the following locations which will require additional site-specific measures:

- *Construction Compounds;*
- *BR01 Tolka River Bridge widening; and*

- *BR02 Mill Road Bridge widening and RW07A and RW07B Pedestrian Ramps at Mill Road.*”

With regard to the works associated with the Tolka Bridge widening, Section 13.5.2.1.2 in Chapter 13 of Volume 2 of the EIAR states:

“.....the following mitigation measures below, which are in line with IFI Guidelines on Protection of Fisheries During Construction Works Adjacent to Waters (2016) (IFI, 2016) on works adjacent to watercourses, will be implemented by the appointed contractor to minimise and avoid impacts:

- *All necessary consents will be obtained from the relevant regulator (such as IFI, OPW or the local authority), as appropriate;*
- *Bank stabilisation and erosion protection, if required, will be designed in consultation with the IFI and NPWS;...*”

Section 5.4.1.2 of Appendix A5.1 CEMP lists the guidance documents which have been considered 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)”*.

Chapter 5 Construction in Volume 2 of the EIAR also outlines the following in section 5.5.4.1.1 regarding the construction works at the Tolka River Bridge:

“Sheet piling will be installed on the land side of the existing gabion baskets to minimise the risk of any construction materials washing into the river and to retain the existing bank during excavation works for the bridge foundations. The sheet piles will be driven and installed in accordance with Inland Fisheries Ireland (IFI) Guidelines on Protection of Fisheries During Construction Works Adjacent to Waters (IFI 2016). Consultation was undertaken (in June of 2021) with IFI and they have confirmed that the works are deemed out-of-channel. Environmental mitigation measures including netting beneath bridge deck adjacent to widening works, and silt curtains and silt busters will be installed within the temporary working area, to mitigate potential impacts associated with surface water runoff on the River Tolka. The appointed contractor will provide site hoarding of 2.4m height between the sheet piles and the watercourse to mitigate potential impacts associated with protected species (Otter and Kingfisher). “

Regarding the operational phase, section 13.5.3 of Chapter 13 Water in Volume 2 of the EIAR states: 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.

With regard to the IFI request that if the Proposed Scheme proceeds, that they be consulted directly on all matters concerning fisheries and surface water, and that reporting of groundwater and surface water monitoring data be extended to IFI on a scheduled basis; the NTA will continue to liaise positively with IFI throughout the delivery stage of the Proposed Scheme, subject to statutory approval of the application.

2.9.10 Brendan Heneghan

2.9.10.1 Overview of submission

The submission raised the following issues:

- Administrative Error
- The Aarhus Convention
- Traffic modelling
- Traffic management proposals in Phibsborough
- Removal of Ashtown roundabout
- Bus journey time savings
- Bus stop locations

2.9.10.2 Administrative Error

Summary of issue

The submission noted that interested parties were advised by the BusConnects team on approximately 12th September 2022 that due to an administrative error, figures 6.1 to 6.12 of Volume 3 of the EIAR were not included on the website www.blanchardstownscheme.ie. The submission stated that the email attempted to trivialise the omission as if it were an incidental technical detail. The submission also stated that what was omitted was a collection of documents that were vital in assessing the overall scheme, despite some of this information being replicated elsewhere in the documents. The submission noted that figure 6.7 gave some information on traffic flows and congestion at junctions.

As a result of this information being missing from the original application the submission stated that the notice issued around 5th July 2022 was incorrect due to a significant part of the application being omitted. The submission also stated that other sources of information relied on in the 12th September communication were not mentioned in the advertisement.

The submission noted that they sought to inspect the file in person on 14th October 2022 but was given a file that did not contain all the information. It was also noted that they also were not able to inspect the submissions from the public as they were unavailable whilst being uploaded to the website. The submission suggested that inspecting documents of this nature is not a practical way of assessing information.

It was noted that 115 submissions are accessible on the website, which predate the notification of the error, and it went on to state that those who made the submissions may have had a different view if all the information had been originally provided.

The submission noted that under Article 302(6) of the 2017 Regulations, related to strategic housing, a second submission is precluded, and if a similar law exists for infrastructure, such a law could not be waived.

The submission stated that it was not clear if people could update their submission free of charge or if they would have to pay another €50.

The submission stated that the original application should have been ruled as invalid and a new application submitted whilst enabling existing submissions to remain valid if the submitter agreed.

Response to issue

The application as submitted to An Bord Pleanála on 24 June 2022 was complete and fully in accordance with the requirements of section 51 of the Roads Act 1993 (as amended) and the Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment as amended by Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014. Specifically, the application as submitted included Figures 6.1 to 6.12 in Volume 3 of the EIAR and the only place where the error occurred was on the NTA's website.

Mr Heneghan is correct in that due to an administrative error Figures 6.1 to 6.12 in Volume 3 of the EIAR were not available for inspection on the NTA website for the Blanchardstown Scheme during the original 8-week period of public consultation that ended on 30 August 2022 although these figures were available for inspection at the offices of the NTA and on the website of An Bord Pleanála during the original 8-week period. Therefore, as explained in the newspaper notice dated 8 September 2022, a further 8-week period for public consultation was provided to all members of the public so as to ensure full and effective public participation which ran from 8 September to 3 November 2022.

Section 51(3)(a)(iii) requires that a period of not less than 6 weeks be provided for public consultation in relation to a proposed road development such as this but here there was an initial period of public consultation of 8 weeks from 5 July to 30 August 2022 and a further public consultation ran from 8 September to 3 November 2022. Therefore, there is no question of there being any legitimate complaint from a public participation perspective.

Mr Heneghan took the opportunity to make a submission in relation to the Blanchardstown Scheme during the second 8-week period.

Also, Mr Heneghan's submission refers to Article 302(6) of the Planning and Development Regulations 2001 (as amended) which, as he notes, relates to strategic housing developments.

There is no equivalent provision applicable to the Blanchardstown Scheme which is a strategic infrastructure development. Therefore, providing the further 8-week period as described above to ensure full and effective public participation was appropriate and lawful and something that the Board were entitled to do.

In fact, even within Article 302(6) itself that Mr Heneghan refers to, this is without prejudice to paragraph (b) of Article 302(6) which says that the “*Board may, at any time before making its decision, request any person, authority or body to make a submission or observation or elaborate upon a submission or observation in relation to an application*”.

In addition to the newspaper notice dated 8 September 2022, the NTA sent email correspondence on 12 September 2022 to 1,804 Community Forum Members (including 321 Public Representatives) to inform them directly of the further 8-week period of public consultation. Mr Heneghan was one of those who received the email correspondence, and he refers to this email correspondence in his submission. The NTA noted in that email dated 12 September 2022 that “*All previous submissions/observations submitted to An Bord Pleanála during the previous period of time for the making of submissions/observations, are unaffected by this additional period and do not require to be resubmitted.*”

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.

2.9.10.3 The Aarhus Convention

Summary of issue

The submission stated that the consultation on the Proposed Scheme was inadequate at all stages of the development of the proposal and that the NTA did not comply with the Aarhus Convention on effective public participation (i.e. Article 6). The submission also stated that holding the statutory consultation over the summer period of July and August is not conducive to public participation.

The submission noted that a lot of the public in the Phibsborough area were not aware of the proposals, and the scale of the changes after the third round of consultations were quite significant and not subject to public consultation.

The submission proposed that the B spine bus route continue to proceed from the southside on its O’Connell Street and Phibsborough alignment, which would remove a number of the issues being raised in the submissions.

The submission stated that Image 3.6 of Chapter 3 Reasonable Alternatives of Volume 2 of the EIAR indicates the route that is optimal, which the submission concluded had disappeared without any explanation.

The submission stated that it is incorrect to state the following, as extracted from page 33 of Chapter 3, as nothing was aired with the public other than some issues associated with choice of Option N1:

“The Proposed Scheme has been the subject of a systematic and comprehensive assessment of alternatives during the course of its development, informed by extensive engagement with residents, businesses, public representatives and the general public.”

The submission went on to state that An Bord Pleanála should have been given the option of a corridor where extensive public consultation took place.

The submission stated that this section of the corridor should be rejected and the alternative options should be properly considered.

Response to issue

In relation to any allegation that Mr Heneghan seeks to make about alleged non-compliance with Article 6 of the Aarhus Convention, Article 6 of the Aarhus Convention lays down certain public participation requirements in relation to “decisions on whether to permit proposed activities”. No such decision has yet been made and indeed the NTA is not permitted to proceed with the Blanchardstown Scheme unless An Bord Pleanála decides to grant it approval under section 51 of the Roads Act 1993 (as amended).

While it was in the context of a separate scheme being the Clongriffin to City Centre Core Bus Corridor Scheme, it is worth noting that the Aarhus Convention Compliance Committee determined on 21 October 2022 (Reference number ACCC/C/2022/193) that a communication from Mr Heneghan concerning compliance by Ireland with the Aarhus Convention was inadmissible because “the decision-making procedure on the Clongriffin bus corridor has not yet concluded”. This Blanchardstown Scheme is at a similar stage in the decision-making process and therefore there is no basis for Mr Heneghan’s complaint.

The decision as to whether development consent will be granted (i.e. the decision within the scope of Article 6) will be made by An Bord Pleanála following the completion of the statutory decision making process in accordance with section 51 of the Roads Act 1993 (as amended), which is fully compliant with Article 6 of the Convention including as regards to public consultation.

An Bord Pleanála is required to consider the application in accordance with section 51 of the Roads Act, 1993 and take a decision on the application. An Bord Pleanála may (i) decide to approve the proposed activity (in this case the Blanchardstown Scheme) with or without modifications and subject to whatever environmental conditions (including conditions regarding monitoring measures, parameters to be measured and the duration of monitoring) it considers appropriate or (ii) may decide to refuse to approve the proposed activity. It is therefore evident that, at this time, no decision with regards to the Blanchardstown Scheme has been taken and that all options remain open to the relevant Competent Authority (An Bord Pleanála).

As part of the assessment of the application, An Bord Pleanála has a range of powers to request further information from the NTA or other parties. Where An Bord Pleanála considers any further information received contains significant additional data, it can direct that it be notified to the public, with the public being given a further opportunity to make submissions and An Bord Pleanála may at its absolute discretion hold an oral hearing into all matters relating to the Blanchardstown Scheme, at which the public concerned may participate.

The statutory procedures by which the decision on the Blanchardstown Scheme will be taken by An Bord Pleanála are fully compliant with the requirements of Article 6 of the Aarhus Convention in that the public concerned were notified of the application, and the procedure by which it would be determined, early in the decision making procedure at the point where all options remain open and were given an opportunity to participate within a reasonable time frame, in excess of those required by the EIA Directive and domestic law.

There is therefore no substance to any allegation that Article 6 of the Aarhus Convention is not being complied with.

Indeed furthermore, prior to the submission of the application for development consent in respect of the Blanchardstown Scheme, the NTA engaged in a consultation process with the public and interested stakeholders which enabled them to provide input to the design and planning stage of this Core Bus Corridor proposal. The purpose of this process was to inform the public and stakeholders of the evolution of the proposal from an early stage and to seek feedback on the design proposals. The consultation process was undertaken by the NTA on a voluntary basis and was not required by law. This consultation process falls outside the scope of the Aarhus Convention.

However, it can be noted that this non-statutory consultation process was undertaken in three phases between November 2018 and December 2020. A summary of that process is contained in the report entitled *A Public Consultation Report 2018 – 2022*, which was furnished to An Bord Pleanála as part of the application for the Blanchardstown Scheme and which is available at <https://blanchardstownscheme.ie/wp-content/uploads/sites/6/2022/06/04.-Blanchardstown-Planning-Doc-16.06.22-FA-WEB.pdf>. In particular, Section 2.4 of the Public Consultation Report explains the nature of the consultations undertaken and the extent of the engagement from the public and stakeholders.

As appears from that report, the process comprised three phases. The first phase related to the Emerging Preferred Route (EPR) which ran from 14 November 2018 to 29 March 2019. The second and third phases related to the Preferred Route Option (PRO) and ran from 4 March 2020 to 17 April 2020 and 4 November 2020 to 16 December 2020 respectively (where online and virtual elements were developed to assist the public in viewing the proposals in the context of Covid 19). The submissions made by the public and stakeholders as part of this process were considered in the design development process.

While as mentioned above, this process falls outside of the scope of the Aarhus Convention, it is evident that the NTA engaged extensively with the public in the course of the design process so that the views of the public could inform the development of the Blanchardstown Scheme.

Further and as an additional effort to facilitate public participation, the NTA sent email correspondence to 1,804 Community Forum Members (including 321 Public Representatives) including Mr Heneghan on 1 July 2022 informing them directly of the submission of the application for development consent to An Bord Pleanála in respect of the Blanchardstown Scheme and notifying them of the opportunity to participate in the statutory public consultation process.

Chapter 3 of Volume 2 of the EIAR sets out the assessment process carried out to arrive at the Emerging Preferred Route and Preferred Route Options for the Proposed Scheme.

Below is text from Chapter 3 which sets out the process undertaken to arrive at 7 options for Study Area section 3, as shown on Image 3.17 of Chapter 3.

As noted in section 3.3.1 Initial High Level Route Alternatives of Chapter 3, the initial “spider’s web” as shown in Image 3.6 was further assessed to arrive at Image 3.17 as follows:

“The initial “spider’s web” was narrowed down having considered existing physical conditions/constraints within the study area. This exercise examined and assessed technically-feasible route options, based upon specific objectives. In addition to being assessed on their individual merits, routes were also assessed relative to each other enabling some routes to be ruled-out if more suitable alternatives existed.

The Stage 1 assessment considered engineering constraints, high-level environmental constraints and an analysis of population catchments. Numerous links forming part of the “spider’s web” were not brought forward to the Stage 2 assessment due to space constraints, lack of appropriate adjacent linkages to form a coherent end-to-end route, unsuitability of particular routes, the need for significant land take from residential properties in addition to other factors.

Arising from consideration of the various permutations possible in respect of the “spider’s web”, a reduced number of coherent end-to-end options were identified for further assessment. In arriving at these options, those links which failed the initial sifting stage were removed as well as those links that were disconnected and could not clearly form part of the end-to-end options.

Options which passed the Stage 1 assessment for each Study Area Section are presented in the following images (extracted from Route Options Assessment (AECOM/ROD, 2018)):

- *Image 3.7: Study Area Section (SAS) 1 – Blanchardstown to M50 East, 49 of the 90 route sections assessed passed Stage 1 Assessment;*
- *Image 3.8: Study Area Section (SAS) 2 – M50 East to Cabra, 13 of the 53 route sections assessed passed Stage 1 Assessment; and*
- *Image 3.9: Study Area Section (SAS) 3 – Cabra to River Liffey, 54 of the 85 route sections assessed passed Stage 1 Assessment.”*

As noted in section 3.3.2 Stage 2 – Route Options Assessment:

“Following completion of Stage 1 initial appraisal, the remaining reasonable alternatives options were progressed to Stage 2 of the assessment process. This process involved a more detailed qualitative and quantitative assessment using criteria established to compare the route options.

The indicative scheme for each route option was evaluated using a multi-criteria assessment. The ‘Common Appraisal Framework for Transport Projects and Programmes’ published by the Department of Transport, Tourism and Sport (DTTAS), March 2016, requires schemes to undergo a ‘Multi-Criteria Analysis’ (MCA) which evaluated the route options under the assessment criteria set out below:

1. *Economy;*
2. *Safety;*
3. *Integration;*

4. Accessibility & Social Inclusion; and

5. Environment

Route options were compared based on a five-point scale, ranging from having significant advantages to having significant disadvantages over other route options. Route options could also be considered neutral when no apparent advantages or disadvantages are identified across all scheme options. Using the same Study Area Sections as Stage 1 Assessment (see Image 3.3), the Stage 2 Assessment involved combining shorter route sections which passed the Stage 1 assessment, to form longer end-to-end potential routes within each SAS.

Following the Stage 1 sifting process for SAS 3, the remaining route options were combined to form seven possible continuous route options between the R147 Cabra Road Junction and the bridge crossings on the River Liffey. “

2.9.10.4 Traffic modelling

Summary of issue

The submission raised concerns that the traffic modelling is not integrated and incorrect. It stated that there are discrepancies between the traffic modelling for the Blanchardstown scheme and the Ballymun / Finglas scheme.

The submission stated that the timing of the applications for both above noted schemes was planned to prevent an overlap.

The submission stated that it is clear from many of the submissions that increased traffic on residential roads is a huge concern for residents. Therefore, the submission stated that integrated traffic modelling must be completed to show the cumulative impacts of both Proposed Schemes.

Response to issue

Both the Blanchardstown to City Centre Core Bus Corridor Scheme and the Ballymun / Finglas to City Centre Core Bus Corridor Scheme are separate and stand-alone CBC schemes that are independent from each other and that is why the statutory planning applications are being applied for separately. However, the potential for cumulative impacts of the Blanchardstown to City Centre Core Bus Corridor Scheme with other projects (including other CBC schemes) has been considered in the EIAR for that scheme, and similarly the potential for cumulative impacts of the Ballymun / Finglas to City Centre Core Bus Corridor Scheme with other projects (including other CBC schemes) has been considered in the EIAR for that scheme.

As noted in section 6.1 of Chapter 6 of Volume 2 of the EIAR:

“This Chapter of the Environmental Impact Assessment Report (EIAR) has considered the potential traffic & transport impacts associated with the Construction and Operational Phases of the Blanchardstown to City Centre Scheme (hereafter referred to as the Proposed Scheme).”

Consequently, the potential traffic and transport impacts assessment does not consider the Ballymun / Finglas to City Centre Core Bus Corridor Scheme.

Similarly, Chapter 6 of the Ballymun / Finglas to City Centre Core Bus Corridor Scheme does not consider the Blanchardstown to City Centre Scheme potential traffic and transport impacts.

Consequently, there are no discrepancies in the information provided for both above noted schemes.

Chapter 21 Cumulative Impacts & Environmental Interactions of Volume 2 of the EIAR reports the assessment of cumulative impacts of the Blanchardstown to City Centre Core Bus Corridor Scheme (hereafter referred to the Proposed Scheme) in combination with other existing and or approved projects and projects which, at the time of assessment, were yet to be approved, but for which a decision on such project is reasonably foreseeable over the likely consenting and construction period anticipated for the Proposed Scheme.

In addition, the chapter addresses the potential for interactions between impacts on different environmental factors of the Proposed Scheme itself on the receiving environment.

Annex IV of the EIA Directive (2011/92/EU as amended by 2014/52/EU) requires that an EIAR provides a 'description of the likely significant effects of the project on the environment resulting from...the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources.'

This chapter identifies and provides an assessment of likely significant cumulative effects caused by the Proposed Scheme in combination with other planned projects. This includes consideration of the potential effects of the other BusConnects Core Bus Corridor Schemes as well as other projects (e.g., Metrolink, DART+). Section 21.2 sets out the process for deciding which other planned projects were included in the assessment.

As noted in section 21.1.2 of Chapter 21 in Volume 2 of the EIAR:

"The first stage of the cumulative effects assessment was to identify other projects deemed potentially relevant to be included in the long list. While the EIA Directive only requires the consideration of other existing and/or approved projects, this assessment has gone further in that it is assumed that the BusConnects Dublin - Core Bus Corridors Infrastructure Works (i.e., the 12 BusConnects Core Bus Corridor schemes) will be undertaken over a circa six year period (with construction commencing in 2023 subject to approval being granted). There is also potential for a number of other projects to receive approval and be progressed within that time period which may give rise to cumulative effects in combination with the Proposed Scheme. It was, therefore, considered appropriate to identify projects which, at the time of assessment, were yet to be approved, but for which a decision and potentially approval is reasonably foreseeable over the likely consenting and construction period anticipated for the Proposed Scheme."

As noted in section 21.6 of Chapter 21 in Volume 2 of the EIAR:

"The assessments assume all 12 proposed Bus Corridor Schemes would be operational, along with other identified projects and GDA Strategy projects included in the Do Minimum and Do Something scenarios. For traffic and transport, the assessment predicted that the Proposed Scheme and the other 11 Core Bus Corridor schemes are expected to facilitate a long term, profound positive cumulative effect on People Movement by sustainable modes. The Core Bus Corridor schemes are seen to enable significant improvements in People Movement by sustainable modes along the direct Core Bus Corridor routes, particularly by bus and cycling, with reductions in car mode share due to the enhanced sustainable mode provision. The Proposed Scheme and the other 11 Core Bus Corridor schemes provide for enhanced integration and efficiencies for all public transport modes by facilitating substantial increases in public transport average network wide travel speeds. "

The following is also noted in section 4.6.6.3 of Chapter 4 in Volume 2 of the EIAR:

"Once in place, both Core Bus Corridor Schemes (Blanchardstown and Ballymun / Finglas) will provide increased capacity, faster journey times and improved reliability for buses which should lead to considerable mode shift from car transport to public transport, which will reduce traffic levels generally across the road network in and around both corridors."

With respect to the timing of both planning applications, there was no plan to prevent an overlap between the statutory consultation periods. As stated earlier both the Blanchardstown to City Centre Core Bus Corridor Scheme and the Ballymun / Finglas to City Centre Core Bus Corridor Scheme are separate and stand-alone CBC schemes that are independent from each other and consequently the statutory planning applications are being applied for separately. The timing of the applications was purely a programming matter with respect to submission of separate planning applications to An Bord Pleanála.

However, the potential for cumulative impacts of the Blanchardstown to City Centre with other projects (including other BusConnects schemes) has been considered in the EIAR.

2.9.10.5 Traffic management proposals in Phibsborough

Summary of issue

The submission stated that all the changes for Phibsborough should be rejected as they are not mentioned in the notice for this application. The submission noted that the only indication of works in Phibsborough were small dots on a map. The submission stated that a notice should have clearly indicated the ancillary works in the Phibsborough area and noted that the Site Notices were inadequate.

The submission stated that there is no mention in the Preferred Route Public Consultation in March 2020 of any proposed traffic restrictions in Phibsborough. The submission suggested it is inappropriate that these were first introduced in the planning application advertised 30th June 2022.

The submission questioned if local access could still be available by using a technology to allow an exemption for registered plates.

Response to issue

Section 51(3)(a) of the Roads Act 1993 (as amended) requires that the newspaper notice be in the prescribed form. That prescribed form is Form No. 4 in the Roads (Schemes) Forms Regulations 2008 (S.I. No. 49 of 2008) (as amended). Note No. (3) in relation to this form says “*Insert a brief non-technical description of the proposed road development*”. The NTA is satisfied that the description used meets this requirement.

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 51 locations along the route of the Proposed Scheme, supplementing the statutory notices for the CPO.

The locations of the non-statutory site notices were as follows:

- Multi-occupancy plots
- Recreational areas and green spaces
- Lands with changing functionality
- Public Right of Way extinguishments and/or restrictions
- Private Right of way acquisitions and/or restrictions

The locations included a site notice at Charleville Road, Annamoe Road, Phibsborough and Monck Place.

Section 1.6 of Chapter 1 of Volume 2 of the EIAR outlines the extent of non-statutory public consultation process.

The Public Consultation Report in the Supplementary Information contains a comprehensive summary of the Non-Statutory Public Consultations and Stakeholder Engagement processes for the Core Bus Corridor Infrastructure Works as a whole (refer also to Chapter 1 in Volume 2 of the EIAR). It also provides a detailed record of the individual consultation and engagement processes for the Blanchardstown to City Centre Core Bus Corridor Scheme through each round of consultation.

The lengthy and extensive public consultation phases ensured the views and observations of a large number of key stakeholders and the general public were received and considered. The public consultation and engagement process has resulted in a considerable level of public awareness and understanding of the BusConnects CBC Infrastructure Work’s aims and objectives. It has also led to the BusConnects Infrastructure team having a keen appreciation of the many stakeholder issues and to be able to consider them during the draft design and planning phases of the Proposed Scheme.

In conclusion, the non-statutory public consultation rounds provided local and informative insights; allowed for considerable discourse and engagement and in many cases enhanced aspects of the draft designs. The public consultation has ensured that the BusConnects Infrastructure team were cognisant of stakeholder feedback and appraised of many local considerations as the designs evolved.

In addition, a total of 64 submissions were received as part of the statutory consultation process regarding Phibsborough and

adjacent streets.

It is not currently possible to facilitate access for local residents only by private vehicle as the current regulations is based on restricting classes of vehicles.

2.9.10.6 Removal of Ashtown roundabout

Summary of issue

The submission stated the roundabout should be retained as cited in submissions by local residents. The submission also noted that the removal of Ashtown roundabout seems to have only be introduced after the March 2022 when it was envisaged to be retained with signals.

Response to issue

As noted in Section 4.5.3.9 Landscape and Urban Realm of Chapter 4 of the EIAR, the Ashtown roundabout currently incorporates Monterey Pine trees and presents as a well-known landmark when approaching or departing the city along the N3. The roundabout will be reconfigured as a signalised junction and this change presents an urban realm opportunity.

The revised junction will greatly improve pedestrian and cycle facilities at the junction and conversion from a roundabout will provides substantial additional pedestrian space around the junction.

This additional space will incorporate high quality hard and soft landscaping that establishes a contemporary landscape character at the junction that will become a new gateway landmark while also facilitating local pedestrian and cyclist movements. Low level shrub planting will provide a buffer between pedestrians and the junction and new trees, ornamental planting, species rich grass areas and high-quality paving will provide an attractive public space. New trees will include semi-mature Monterey Pine referencing the existing trees on the roundabout.

Refer to Figure 2.9.49 below showing proposed landscaping at Ashtown Road Junction, extracted from Landscaping General Arrangement Drawings from Volume 3 of the EIAR. The red circles indicated trees to be removed.

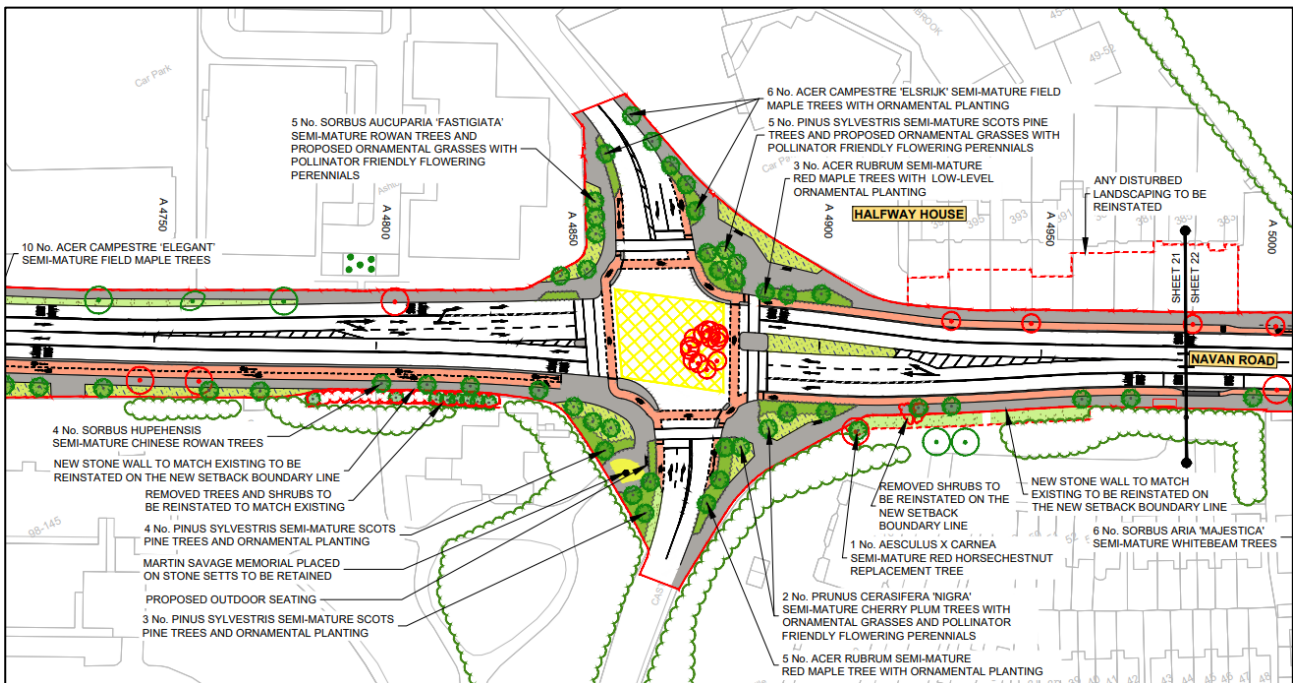


Figure 2.9.49: Proposed landscaping at Ashtown Road Junction (as extracted from Landscaping General Arrangement Drawing)

Section 6.2.2.2.1 of the Preferred Route Option Report outlines the design decisions behind removing the existing roundabout and implementing a signal-controlled crossroads junction. It states that *following traffic modelling analysis and consideration of issues raised from the third round of public consultation submissions, it is now proposed to revert to the EPR option of a signal-controlled crossroads junction. The*

proposed layout includes separate pedestrian and cyclist crossing facilities at the junction, along with enhanced segregation of pedestrians and cyclists from vehicles. This results in improved safety for both pedestrians and cyclists.

This change is also reflected in Chapter 3 (Section 3.4.2) in Volume 2 of the EIAR.

Bus priority is also better achieved with buses being able to move directly through the junction in their dedicated nearside bus lane. This is in comparison to a roundabout layout where turning traffic on the gyratory would have priority, even when signalised, over bus and general traffic on the Navan Road entry points.

Section 4.6.1 of Chapter 4 of the EIAR states:

“Traffic lane widths (including bus lanes) will follow the guidance outlined in DMURS, with the preferred width of traffic lanes on the Proposed Scheme being:

- 3.0m in areas with a posted speed limit <60km/h; and
- 3.25m in areas with a posted speed limit >60km/h.”

Section 4.6 Summary of Horizontal Alignment of the Preliminary Design Report outlines measures that have been implemented to reduce speed limits on this section of the scheme. It states that as the Proposed Scheme passes through the constrained corridor on approach to the Ashtown Road junction, the proposed layout will see the central median of the existing carriageway removed and the road will change to single carriageway classification in conjunction with a speed limit reduction from 60km/h to 50km/h beyond Phoenix Park Avenue junction towards the city centre. Lane widths will be reduced to 3.0m which will also act to reduce traffic speeds.

As noted in section 17.5.2.1 Review of Photomontages of Chapter 17 Landscape and Visual of Volume 2 of the EIAR, *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 proposed views are shown with proposed planting at approximately 10 – 15 years post completion of the Construction Phase. This below text describes the Proposed Scheme changes as illustrated in the photomontage. The Photomontages are as included in Figure 17.2 in Volume 3 of the EIAR.*



Figure 2.9.50: Existing view from Navan Road at Ashtown Roundabout



Figure 2.9.51: Photomontage view as Proposed - View from Navan Road at Ashtown Roundabout

Figure 2.9.51 shows the proposed view from Navan Road at Ashtown Roundabout looking north across the roundabout junction from the verge on the southern edge. The primary changes in the view are: the conversion of the roundabout to a signalised junction; the loss of the central landscape area and tree planting; the addition of segregated cycle tracks and lanes to all adjoining roads and circumnavigating the junction; and addition of new planted beds and street trees to all sides of the junction. There would be a minor neutral change in the character of the view, however, the replacement planting avoids loss of visual amenity.

2.9.10.7 Bus journey time savings

Summary of issue

The submission expressed the view that the anticipated journey time savings of 35 to 40 minutes presented during the public consultation process in March 2020 are not consistent with the journey time savings now being reported for the Proposed Scheme.

The submission noted the results from the tables in section 6.4.6.2.5.2 of Chapter 6 of Volume 2 of the EIAR and suggested that the predicted time being saved does not justify some aspects of the Proposed Scheme, including bus gates on Old Cabra Road and Prussia Street, which should be time-plated as a result.

The submission also stated that the assertion of time a bus journey currently takes is without foundation.

Response to issue

Section 6.2.5.2.3.1 of Chapter 6 states that *Bus Journey time data for the Proposed Scheme was provided by the NTA from the Automatic Vehicle Location (AVL) dataset used to monitor bus performance. The data provides information on bus travel time and dwell times at existing bus stops and has been used to inform the development of the transport models used to assess the impacts of the Proposed Scheme.*

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 Do Something scenarios. In reality as stated in section 6.4.6.2.5.2 of 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*”.

As stated in section 6.4.6.2.6 of Chapter 6:

“The findings of the Bus User assessment shows that the Proposed Scheme fully aligns with the aims and objectives of the CBC Infrastructure Works, 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.

The significance of impact on bus users of the Proposed Scheme has been appraised using a qualitative assessment, taking the changes in journey time and journey reliability metrics presented above into consideration. The Proposed Scheme is considered to deliver a Positive, Very Significant and Long-term impact overall.”

Section 6.4.6.3 of Chapter 6 states the following:

“The Proposed Scheme will address sustainable mode transport infrastructure deficits while contributing to an overall integrated sustainable transport system as proposed in the GDA Strategy. It will increase the effectiveness and attractiveness of bus services operating along the corridor and will result in more people availing of public transport due to the faster, more reliable journey times which the Proposed Scheme provides. This in turn will support the future increase to the capacity of the bus network and services operating along the corridor and thereby further increasing the attractiveness of public transport. In addition to this, the significant segregation and safety improvements to walking and cycling infrastructure that is a key feature of the Proposed Scheme will further maximise the movement of people travelling sustainably along the corridor. The combined effect of these changes will therefore cater for higher levels of future sustainable population and employment growth.

In the absence of the Proposed Scheme, bus services will be operating in a more congested environment, leading to higher journey times and lower reliability for bus journeys. This limits their attractiveness to users, and this will lead to reduced levels of public transport use, making the bus system less resilient to higher levels of growth. The absence of walking and cycling measures that the Proposed Scheme provides will also significantly limit the potential to grow those modes into the future.

On the whole, the Proposed Scheme will make a significant contribution to the overall aims of BusConnects that is a key part of the GDA Strategy and will enable the city to grow sustainably into the future. This would not be possible in the absence of the Proposed Scheme.”

2.9.10.8 Bus stop locations

Summary of issue

The submission noted that they are not conversant with the detail of this scheme but suspects that the moving of bus stops has created controversy for the public, including poorly communicated bus stop changes. The submission affirmed that there should have been a notice placed at each location where a bus stop is proposed to be relocated due to the impact that this will have on its users, particularly those with limited mobility. The submission added that this would then allow the public to comment on proposed relocation of any bus stops.

Response to issue

As noted in section 2.9.10.5 above, 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 51 locations along the route of the Proposed Scheme, supplementing the statutory notices for the CPO.

The location of bus stops is listed in Chapter 4 Proposed Scheme Description of Volume 2 of the EIAR. The bus stops are also clearly indicated on the General Arrangement Drawings in Volume 3 of the EIAR, which includes information on whether the bus stop is an existing bus stop retained, proposed bus stop and also notes where an existing bus stop has been removed.

2.9.10.9 Conclusion

Summary of issue

The submission concluded that the Proposed Scheme between Old Cabra Road and the Quays is poorly thought out and has not been the subject of adequate consultation.

The submission called for further public consultation on:

1. Proposals for Phibsborough and Stoneybatter areas; and
2. Proper integrated traffic modelling;

The submission called for the rejection of this portion of the scheme and requested an oral hearing.

Response to issue

As noted in section 1.6 of Chapter 1 of the EIAR:

- The EPR public consultation phase for the Proposed Scheme occurred from 14 November 2018 to 29 March 2019.
- The PRO, or second round of, public consultation took place from 4 March 2020 to 17 April 2020.
- The third round of public consultation took place from 4 November 2020 to 16 December 2020.

Further details on the extensive public consultation process are given in section 2.10.2.1 of this report.

Refer to section 2.9.10.4 above for a response on the need for integrated traffic modelling.

The NTA notes the request for an Oral hearing which will be a matter for An Bord Pleanála to decide.

2.10 Other Common Issues

2.10.1 Overview of Submissions Received

There was a number of common issues raised throughout the submissions that did not refer to a specific location. These are noted in Table 2.10.1 along with the relevant submission numbers that raised them.

Table 2.10.1: Other common issues raised and relevant submission numbers

Issue	Submission Numbers	Issue	Submission Numbers
Consultation Process	01, 03, 11, 28, 37, 39, 40, 42, 51, 60, 79, 80, 82, 85, 86, 89, 92, 96, 97, 98, 101, 109, 113, 114	Providing for Mobility Impaired Users	07, 79, 80, 83, 88, 93
Use of appropriate baseline modelling	11, 12, 13, 17, 21, 46, 48, 52, 59, 84, 99, 110, 120	Consideration of Dart+ West	83, 93, 113
Alternative Measures	36, 42, 60, 83, 93, 106, 123	Carbon emissions	42, 67
Change in travel demand and patterns of travel due to COVID-19 pandemic	11, 54, 60, 83, 85, 93, 98, 109		
Transport modelling	02, 96	Need for the Proposed Scheme	16, 98
Planning Documentation	01, 06, 11, 12, 13, 17, 21, 39, 46, 48, 51, 52, 59, 62, 79, 84, 85, 110, 120,	Future housing developments	10, 89, 98
Road Traffic and Roads Bill 2021	34, 35	Bus journey time and reliability	16, 28, 45, 60, 85, 98

2.10.2 Common Issues Raised

2.10.2.1 Consultation Process

Summary of issue

A submission noted that the NRCC had met with the NTA on a number of occasions with meetings being informative and constructive.

The submission stated that they were informed by the NTA on the 13th February 2020 that the roundabout would be retained, however due to the Covid pandemic, they stated that this was the last meeting they had with the NTA. The submission stated that in recent times the NTA have been unable or unwilling to facilitate engagement with the NRCC. The submission emphasised their frustration and anger that despite the NTA agreeing to maintain the Ashtown Roundabout in the scheme design in 2020, that it was now removed in the drawings submitted to An Bord Pleanála.

Submissions stated that the consultation process was inadequate and that the entire process took place online therefore disenfranchising people who do not have access to the internet.

A submission noted that there has been inadequate consultation with residents’ associations in Castleknock, Blackhorse Avenue and Navan Road.

Some submissions stated that their voice was not listened to and they see little changes in their area from what was originally presented to them.

Submissions noted that the process did not enable the public to make representations on the scheme, and that the current scheme has varied in many respects from that set out during the process, which does not allow an appropriate opportunity for individuals to make observations on.

A submission stated that the process purposefully excluded the elderly, landlords and tenants who make up the majority of stakeholders in the Phibsborough and North Circular Road area.

A submission noted that the NTA refused to meet with residents of Navan Road and adjoining estates to learn of concerns regarding removal of trees, closure of roads and CPO of gardens.

Submissions noted a lack of meetings and consultations to discuss the Proposed Scheme.

A submission also noted that there has been little engagement with local councillors on the latest proposals, including lack of updates to the DCC Traffic Strategic Policy Committee.

Many submissions also raised concerns over the date the planning application was submitted. They stated that lodging the application over the peak holiday period when many people are on holiday, including elected public representatives, resulted in residents not being able to access the critical information. It was also stated that many of the submissions were aware that it was requested for the consultation period to be extended, however this was refused by the NTA.

A submission stated that the CPO process should not be used to avoid public consultation.

Submissions objected to the €50 fee as being prohibitive.

Response to issue

As noted in section 1.6.1 Consultation of Chapter 1 of the EIAR:

“Public participation has been an integral part of the iterative development of the Proposed Scheme from the outset. Pre-application public consultation was carried out, in three phases (one in relation to Emerging Preferred Route consultation and two in relation to the Preferred Route Option consultation), to inform the public and stakeholders of the development of the Proposed Scheme from an early stage and to seek feedback and participation throughout its development. The BusConnects Infrastructure team has undertaken a comprehensive consultation and engagement process with stakeholders, landowners and members of the public throughout the development of the Proposed Scheme.

The primary objective of the non-statutory public consultation process was and is to provide opportunities for members of the public and interested stakeholders to contribute to the planning and design of the Proposed Scheme and to inform the development process. Public participation in the planning and design of the Proposed Scheme was encouraged from an early stage through on-the-ground engagement and information and media campaigns.

The early involvement of the public and stakeholders ensured the views of various groups, individuals and stakeholders were taken into consideration throughout the development of the Proposed Scheme and in the preparation of this EIAR. The pre-application consultation process assisted in:

- *The establishment of a sufficiently robust environmental baseline for the Proposed Scheme and its surroundings;*
- *The identification, early in the process, of specific concerns and issues relating to the Proposed Scheme so that they could be appropriately accounted for in the design and assessment scope; and*
- *Ensuring the appropriate involvement of the public and stakeholders in the assessment and design process.*

The consultation process involved engagement from:

- *Emerging Preferred Route (EPR) Option Consultations through;*
- *Preferred Route Option (PRO) Consultations.”*

As noted in section 1.6.2 Emerging Preferred Route Option Consultation of Chapter 1 of the EIAR:

“The EPR public consultation phase for the Proposed Scheme lasted from 14 November 2018 to 29 March 2019.

The public were invited to make written submissions in relation to the published proposals to the BusConnects Infrastructure team either through an online form, by email or by post. There were two consultation events held in which the public were able to view the proposals and discuss them directly with members of the BusConnects Infrastructure team. These were held at The Crowne Plaza, Blanchardstown on Tuesday 15 January 2019 and at the Gresham Hotel, Upper O'Connell Street on 17 January 2019.

In addition to the open public consultation, a Community Forum was established with the aim of facilitating two-way communication between local communities and the BusConnects Infrastructure team.

Community Forum meetings took place on 12 December 2018 at the Crowne Plaza Hotel and 5 February 2019 at the Ashling Hotel. The meeting involved the presentation of an overview of the design for the Proposed Scheme and, with the use of an independent chairperson, the representatives were given the opportunity to ask questions of the BusConnects Infrastructure team and provide feedback.

In addition, there have been meetings held with residents' groups to provide updates on aspects of the Proposed Scheme. The BusConnects Infrastructure team has made the presentations given at the Community Forum and Residents Group meetings available to the public on the BusConnects website (www.busconnects.ie).

Letters were delivered to each individual potentially impacted property affected by the Proposed Scheme that, in addition to providing information about the Proposed Scheme, offered a one-to-one meeting to discuss the likely impact, issues and concerns. Each potentially impacted property was also sent a copy of the Emerging Preferred Route brochure for the Blanchardstown to City Centre Core Bus Corridor. Approximately 124 letters were delivered on 09 November 2018 along the Blanchardstown to City Centre Core Bus Corridor, with 20 property owners availing of the one-to-one meetings.

There were a total of 542 submissions made in respect of the Proposed Scheme during the Emerging Preferred Route public consultation phase."

As noted in section 1.6.3.2 Preferred Route Option Consultation Overview of Chapter 1 of the EIAR:

"The PRO, or second round of, public consultation took place from 4 March 2020 to 17 April 2020. This second round of consultation accepted public submissions until 17 April 2020. The public were invited to make written submissions in relation to the published proposals to the BusConnects Infrastructure team either through an online form, by email or by post. Due to the COVID-19 pandemic all planned events scheduled after 12 March 2020 were cancelled. In deference to the submissions which had already been received, the decision was made not to cancel the consultation. However due to the introduction of COVID-19 public health restrictions further on- site or face-to-face public engagement was restricted.

Following the EPR submissions review of the proposals, there were some changes to the number of properties that were potentially impacted, and letters were prepared and delivered to properties either continuing to be potentially impacted; newly potentially impacted; or no-longer potentially impacted, with recipients invited to schedule meetings with the BusConnects Infrastructure team if they wished to discuss the proposals on an individual basis.

Consequently, presumably due to the COVID-19 impacts, there were just 49 submissions received relating to the Proposed Scheme, and only four landowner meetings were possible. The submissions ranged from individual submissions by residents, commuters and local representatives, to detailed proposals from various associations and private sector businesses.

Design development and planning for the Proposed Scheme continued and, the BusConnects Infrastructure team determined to run an additional round of public consultation in November 2020 to complete the non-statutory public engagement prior to finalising the PRO. The third round of public consultation took place from 4 November 2020 to 16 December 2020.

With the continuing effect of the COVID-19 pandemic and associated restrictions, the third Public Consultation was held largely virtually. A virtual consultation room for the Proposed Scheme was developed and virtual access to the room was facilitated. Along with offering a call back facility, the room provided a description of the Preferred Route from start to finish with supporting maps and included information of all revisions made, if any, since the previous rounds of public consultation as well as other supporting documents.

Over the seven weeks of the consultation, 1,253 users visited the virtual consultation room for the Proposed Scheme. A third Community Forum virtual consultation call was also held on 17 November 2020 as part of the third round of non-statutory consultation.

As per the previous rounds, those properties continuing to be either potentially impacted; newly potentially impacted; or no-longer potentially impacted were written to directly to receive information on the consultation in advance of any wider publication of the proposals. One-to-one meetings were offered via Zoom or over the phone for those who wished to discuss the proposals further in relation to their own property with the minutes being recorded as part of the consultation process.

Approximately 124 letters were sent on 2 March 2020 and approximately 4 one to one meetings took place during the second phase of public consultation. In addition, approximately 80 letters were sent between 1 and 3 November 2020 during the third phase of public consultation.

As per previous rounds the public were invited to make written submissions in relation to the published proposals to the BusConnects Infrastructure team either through an online form, by email or by post.

In addition, virtual meetings were resumed with residents' groups to provide updates on aspects of the Proposed Scheme.

There were 583 submissions received over the second and third phases of public consultation (March/April 2020 and November/December 2020)."

As noted in section 1.6.3.3 of Chapter 1 of the EIAR:

"The issues raised during the second round of public consultation in March/April 2020 and the additional (third) public consultation phase in November/December 2020 were broadly the same. These issues have been considered in the iterative Proposed Scheme development.

The PRO proposals were further amended where appropriate while still ensuring attainment of the Proposed Scheme objectives, to address the issues raised in submissions, including incorporating suggestions and recommendations from local residents, community groups and stakeholders, where appropriate. These amendments were incorporated into the designs and formed the Preferred Route which has been developed for statutory public consultation in relation to the Proposed Scheme.

Design changes which were adopted as part of the final PRO include:

- The proposed layout at Mulhuddart junction has been changed, with cycle tracks modified and bus lanes removed from the N3 Overbridge at this location. Cycle tracks are now proposed on the nearside of the carriageway and cycle crossings alongside pedestrian crossings to minimise conflict between cyclists and motorists. The layout for Blanchardstown Road South has also been modified with the removal of the eastbound bus lane and provision of a bus layover;*
- The previously proposed two-way cycle track westbound along the R147 Navan Road to Auburn Avenue Junction is modified with cyclists routed from the R147 to an on-street 'Quiet Street' cycle route along Castleknock Manor. This will remove the need for land take in this area;*
- At the Navan Road/Ashtown Road junction, the PRO scheme modifies the existing roundabout to a signal-controlled crossroads. This is generally consistent with the EPR proposed layout and a change from the proposed signal-controlled roundabout shown in the November 2020 public consultation drawings;*
- New traffic signal controls are proposed at the Old Cabra Road/Glenbeigh Road junction, which will enable general traffic flows turning left or right onto Old Cabra Road (local access only) to be controlled (mitigating the risk of general traffic using Glenbeigh Road as a rat-run)*
- The location of the northbound bus gate on Old Cabra Road has been relocated to the railway overbridge to facilitate local access to properties south of the railway bridge;*
- Kirwan Street general traffic (which is westbound only) are proposed to be limited to 'left-turns only' at its junction with Manor Street (to reduce the opportunity for rat-running by northbound through traffic via Grangegorman Lower to Aughrim Street and beyond);*

- *The revised proposals along Manor Street results in a reduction from a maximum of four lanes (two bus lanes and two general traffic lanes) to two general traffic lanes. The modified design also includes a northbound and southbound cycle track, wider footpaths and enhanced urban realm as a result of the reduction in carriageway width;*
- *At the north end of George's Lane, the revised proposals have a signal-controlled junction at Grangegorman Street Lower/Brunswick Street North;*
- *A northbound bus lane on Blackhall Place (at its junction with King Street North) is proposed and all northbound general traffic will be required to turn right into King Street North. Northbound general traffic will be required to travel via George's Lane and Brunswick Street North to reach Manor Street. Traffic signals at the Brunswick Street North/Stoneybatter junction will enable the level of flow of northbound general traffic to be controlled and limited to a level which will ensure that buses are able to travel without delay along this section. At the north end of George's Lane, the revised proposals have a signal-controlled junction at Grangegorman Street Lower/Brunswick Street North, with northbound traffic only on George's Lane, and a two-way cycle track; and*
- *Offline traffic management measures have been introduced to minimise general traffic levels on local side streets."*

The National Transport Authority (NTA) has applied under section 51(2) of the Roads Act 1993 (as amended) to An Bord Pleanála for approval in relation to a proposed road development consisting of the construction of the Blanchardstown to City Centre Core Bus Corridor Scheme. The application was made to An Bord Pleanála on the 24th of June 2022. An application for confirmation of the associated Compulsory Purchase Order under Section 76 of, and the Third Schedule to, the Housing Act 1966 (as amended) was submitted to An Bord Pleanála on the 1st of July 2022.

The statutory public consultation process period ran from 5th July 2022 to 30th August 2022, a period of eight weeks, two weeks longer than the specified minimum statutory consultation period.

Due to an administrative error, a further period of time for inspection and for the making of submissions relating to the Blanchardstown to City Centre Core Bus Corridor Scheme pursuant to 51(3) of the Roads Act 1993 (as amended) was introduced.6.4.6.2.4

This was to ensure full and effective public participation, as it came to the National Transport Authority's attention that figures 6.1 to 6.12 in Volume 3 of the Environmental Impact Assessment Report were not available on the NTA website during the previous period for inspection and for the making of submissions/observations that ended on 30th August 2022 (although these figures were available for inspection at (i) the offices of the NTA, (ii) the offices of An Bord Pleanála and (iii) on the website of An Bord Pleanála at <https://www.pleanala.ie/en-ie/case/313892> . This error was rectified on the NTA website for the Blanchardstown to City Centre Core Bus Corridor Scheme (www.blanchardstownscheme.ie), on 31 August 2022.

Updates to the Dublin City Council Strategic Policy Committee is a matter for Dublin City Council.

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.

2.10.2.2 *Use of appropriate baseline modelling*

Summary of issue

Submissions stated that the baseline used for the published modelling results is not based on current traffic flows but on a Do Minimum scenario for 2028. The 2028 scenario includes a number of future transport projects which have yet to commence or be completed and there is no guarantee they will be completed by 2028, with the consequent impacts on traffic flows in the area.

The submissions argued that the baseline is artificially deflated and that the estimates under a 'Do Something' scenario do not reflect the extent of the impact of the Proposed Scheme.

The submissions stated that the absence of a baseline based on current traffic flows preclude local communities from assessing the impact on their area as a result of the Proposed Scheme.

The submissions stated that failure to publish modelling that compares the current situation with future traffic flows does not present a comprehensive picture of the changes to the communities concerned.

The submissions stated the forecasted increases in PCU's on Connaught Street as noted in Chapter 6.

Response to issue

The following is noted in section 6.4.3 of Chapter 6 Traffic & Transport of the EIAR:

“the ‘Do Minimum’ scenario represents the likely traffic and transport conditions of the direct and indirect study areas without the Proposed Scheme in place. This scenario forms the reference case by which to compare the Proposed Scheme (‘objective’). The opening year for the Proposed Scheme is assumed to be 2028, with a design assessment year (opening + 15 years) assumed to be 2043.

For the qualitative analysis the assessment is in relation to the conditions of the existing transport network, which have been outlined in Section 6.3 (Baseline Environment) corresponding with a ‘Do Nothing’ scenario. As a result of the COVID-19 pandemic a number of temporary transport mobility measures have been implemented. Due to their temporary status, the measures are not considered a permanent long-term feature of the receiving environment and as such have not been considered in the impact assessments.

For the quantitative analysis (i.e. the transport modelling elements of the impact assessment), the Do Minimum scenario is based on the ‘likely’ conditions of the transport network and include for any known permanent improvements or changes to the road or public transport network that have taken place, been approved or are planned for implementation. The transport schemes and demand assumptions within the Do Minimum scenario are detailed below.

Do Minimum Transport Schemes

The core reference case (Do Minimum) modelling scenarios (Opening year - 2028 and Design year - 2043) are based on the progressive roll-out of the Greater Dublin Area (GDA) Transport Strategy 2016-2035 (GDA Strategy), with a partial implementation by 2028, in line with National Development Plan (NDP) investment priorities and the full implementation by 2043.

The GDA Strategy provides an appropriate transport receiving environment for the assessment of the Proposed Scheme for the following reasons:

- *The GDA Strategy is the approved statutory transportation plan for the region, providing a framework for investment in transport within the region up to 2035;*
- *The GDA Strategy provides a consistent basis for the 'likely' future receiving environment that is consistent with Government plans and Policies including the National Planning Framework (NPF) and National Development Plan (NDP); and*
- *Schemes within the GDA Strategy are a means to deliver the set of objectives of the GDA Strategy.*

The sequencing and delivery of the strategy is defined by the implementation plan, but the optimal outcome of aiming to accommodate all future growth in travel demand on sustainable modes underpins the Strategy.

The Do Minimum scenarios (in both 2028 and 2043) include all other elements of the BusConnects Programme of projects (apart from the CBC 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 CBC elements). As outlined above, the 2043 Do Minimum scenario assumes the full implementation of the GDA Strategy schemes, so therefore assumes that proposed major transport schemes such as MetroLink, DART+ Tunnel, Luas line extensions to Lucan, Finglas and Bray are all fully operational.”

2.10.2.3 *Alternative Measures*

Summary of issue

Submissions suggested that to encourage commuters to move from car to public transport, it is imperative that attractive park and ride facilities are provided for the commuter belt at current bus and rail transport hubs. Some submissions also stated that shuttle services should be provided to link outer park and ride facilities to the proposed improved public transport network. A submission also requested that parking price be incorporated into the costs of a bus ticket, and this be put in place as part of the Proposed Scheme.

A submission requested that An Bord Pleanála should require NTA to provide park and ride facilities to mitigate private vehicle displacement in residential communities including Stoneybatter, Cabra, Phibsborough and Navan Road.

A submission stated that there is lack of integrated ticketing for public transport.

Submissions stated that alternative measures have not been considered and stated that the use of fare subsidies or congestion charging would achieve the stated aims of the scheme without the need for land acquisition of private gardens.

Additional Measures

A submission proposed some additional measures that is believed would take pressure off Stoneybatter and other fragile urban communities threatened by core bus corridors, as follows:

- Link-up with the railway line at Navan Road / Parkway station, which can transport commuters to the city centre, and with the planned Metrolink, it has the potential to remove a large quantity of traffic from the road.
- Express bus routes: At present, virtually all buses coming along the N3 / Navan Road corridor pass through Manor Street and Stoneybatter. Consideration should be given to alternative routes for out-of-town transport, which would relieve traffic pressure on Stoneybatter and Phibsborough.
- Legislation on traffic enforcement is essential, if BusConnects is to have any credibility the NTA, not An Garda Síochána, must take responsibility for policing the operation of the scheme and any resulting traffic restrictions.

The submission also expressed disappointment that Dublin Bus has recently acquired a 100 strong fleet of high polluting diesel buses. The submission stated that if BusConnects is to succeed in reducing carbon emissions to combat climate change and achieve the required legal targets of 42% to 50% reduction in emissions, it will be essential to ensure that the BusConnects fleet comprises low-emissions vehicles only.

Response to issue:

EIAR Chapter 2, Need for the Proposed Scheme, Section 2.2.1.5 outlines the following:

“BusConnects Dublin is a suite of transformative changes to the bus system, intended to make it more efficient, faster, reliable and easier to use. The BusConnects Dublin programme contains nine elements, one of which is the BusConnects Dublin – Core Bus Corridor Infrastructure Works (the CBC Infrastructure Works). The nine elements are:

- *Core Bus Corridor Infrastructure Works;*
- *Dublin Area Bus Network Redesign;*
- *Transitioning to a new low emissions bus fleet;*
- *State of the art ticketing system;*
- *Cashless payment system;*
- *Simpler fare structure;*
- *New Park and Ride sites in key locations;*

- *New bus livery providing a common style across all operators; and*
- *New bus stops and shelters with better signage and information.”*

Regarding the statement on a low-emission fleet being essential, section 9.4.4.1.1.4 of Chapter 9 of Volume 2 of the EIAR states:

“The NTA forecast for the year 2028 is 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”.

It is noted that new park and ride facilities form part of the broader BusConnects programme and will be implemented to complement improvements to the overall bus system, including the Proposed Scheme infrastructure.

EIAR Chapter 4, Proposed Scheme Description section 4.6.6 states that one of the objectives of the Proposed Scheme is to enhance interchange between the various modes of public transport operating in Dublin City and wider metropolitan area. The Proposed Scheme facilitates improved existing and new interchange opportunities with other transport services including future rail public transport services including DART+ and MetroLink.

Proposed bus stop locations along the scheme include Navan Road / Parkway station.

The NTA acknowledges the comments raised in relation to enforcement. Enforcement of road traffic laws, including turning bans at junctions is a matter for An Garda Síochána.

The proposed bus priority measures on core bus corridors are aimed at ensuring that bus passengers’ journeys are faster and more reliable; this includes passengers on longer distance and limited stop express services where present. Relocating long-distance bus services to alternative corridors, as suggested in the submission, would not align with this aim.

Regarding the use of congestion charging, section 3.2.7 Demand Management Alternative of Chapter 3 of Volume 2 of the EIAR states the following:

“Demand management can take many different forms from restricting car movement or car access through regulatory signage and access prohibitions, to parking restrictions and fiscal measures (such as tolls, road pricing, congestion charging, fuel/vehicle surcharges and similar). All of these approaches discourage car use through physical means or by adding additional costs to car use such that it becomes more expensive and alternative modes become more attractive. A key success factor of demand management is greater use of alternative travel modes, in particular public transport.

However, in the case of Dublin, the existing public transport system does not currently have sufficient capacity to cater for large volumes of additional users. In the case of the bus system, the increasing levels of traffic congestion over recent years prior to the COVID-19 pandemic added to bus delays and means that additional bus fleet and driver resources have been utilised simply to maintain existing timetables, rather than adding overall additional capacity. The objective of the GDA Transport Strategy is to significantly increase the capacity, and subsequent use, of the public transport system, focussing on the overall BusConnects Programme in the case of the bus system, the DART+ Programme in the case of heavy rail, and the Luas/Metro programme in the case of light rail.

Congestion is a significant contributor to GHG emissions and the related negative environmental impacts associated with poor air quality, noise levels, and related health and quality of life consequences. Demand management measures need to be associated with positive environmental benefits that can be achieved when commuters change modes to high-quality public transport, walking, and cycling that can help reduce GHG emissions and bring associated health benefits.

The objective of the GDA Transport Strategy to significantly increase the capacity, and subsequent use of these alternative modes requires that the necessary physical infrastructure is necessary to deliver the efficiencies to make the mode-shift attractive and environmentally beneficial.

In advance of a significant uplift in overall public transport capacity in the Dublin metropolitan area, the implementation of major demand management measures across that area would be unsuccessful.

Effectively constraining people from making journeys by car and requiring them to use other modes, without those modes having the necessary capacity to cater for such transfer, would not deliver an effective overall transport system. Instead, the capacity of the public transport system needs to be built up in advance of, or in conjunction with, the introduction of major demand management measures in the Dublin metropolitan area. This is especially true in the case of the bus system where a major increase in bus capacity through measures such as the Proposed Scheme would be required for the successful implementation of large-scale demand management initiatives.

While the foregoing addresses the dependency of demand management measures on public transport capacity, it is equally correct that the provision of greatly enhanced cycling facilities will also be required to cater for the anticipated increase in cycling numbers, both in the absence of demand management measures and, even more so, with the implementation of such measures.

Demand management initiatives by themselves will not deliver the level of segregated cycling infrastructure required to support the growth in that mode. Consequently, the progression of demand management proposals will not secure the enhanced safe cycling infrastructure envisaged under the Proposed Scheme.

Accordingly, the implementation of demand management measures would not remove the need for additional infrastructure to serve the bus transport needs of the corridor covered by the Proposed Scheme, nor would it obviate the need to develop the cycling infrastructure required along the route of the Proposed Scheme.”

2.10.2.4 Change in travel demand and patterns of travel due to COVID-19 pandemic

Summary of issue

A number of submissions raised concern that the traffic assessments are based on pre-pandemic (COVID-19) data which does not reflect the change in travel demand and pattern of travel resulting from employees choosing to work from home and rely less on travel by car or public transport.

A submission questioned what analysis has been carried out post-covid to validate the data in terms of number of people commuting now compared with pre-covid figures.

Response to issue

The following is noted in Section 2.1 of Chapter 2 Need for the Proposed Scheme of Volume 2 of the EIAR, in relation to the effect of COVID-19:

“The COVID-19 pandemic brought about a short-term change in travel patterns in the Greater Dublin Area (which led, for example, to fewer people using public transport and more people working from home). Travel demand and patterns of travel have now started to return to pre-pandemic levels and are anticipated to grow in line with population growth. The impacts on travel demand and patterns of travel are still dependent on the quality of the transport system, in particular the reliability of a bus service that is not constrained by general traffic congestion.”

Chapter 6 Traffic and Transport of Volume 2 of the EIAR has considered the potential traffic & transport impacts associated with the Construction and Operational Phases of the Blanchardstown to City Centre Core Bus Corridor Scheme. Section 6.4.6.2.8.1 of this document has addressed the flexibility in working arrangements brought on following COVID-19 and states:

“The Proposed Scheme aims to provide an attractive alternative to the private car and promote a modal shift to public transport, walking and cycling. It is, however, recognised that there will be an overall reduction in operational capacity for general traffic along the direct study area given the proposed changes to the road layout and the rebalancing of priority to walking, cycling and bus. This reduction in operational capacity for general traffic along the Proposed Scheme will likely create some level of trip redistribution onto the surrounding road network.

It should be noted that the Do Minimum and Do Something scenarios are based on the assumption that travel behaviour will remain broadly consistent over time and that car demand, used for this assessment, represents a reasonable worst-case scenario. It is possible that societal trends in the medium to long term may reduce car demand further due to ongoing changes to travel behaviours and further shifts towards sustainable travel, flexibility in working arrangements brought on following COVID – 19, and delayed car ownership trends that are emerging.”

In summary it is considered that the traffic assessment contained in the EIAR, and the traffic data upon which it is based (collected pre COVID-19), represents a reasonable basis for the assessment.

2.10.2.5 Transport modelling

Summary of issue

Submissions stated that only the impact on the Core Bus Corridor has been considered.

Another submission stated that the focus of the traffic analysis is on commuter travel, while the level of redirection required by local traffic has not been considered.

Concerns were also expressed about the traffic modelling used and noted that the modelling will be pivotal to the success of the Proposed Scheme.

Response to issue

As noted in section 6.1 of Chapter 6 of Volume 2 of the EIAR:

“This Chapter of the Environmental Impact Assessment Report (EIAR) has considered the potential traffic & transport impacts associated with the Construction and Operational Phases of the Blanchardstown to City Centre Scheme.”

As noted in section 6.2.1 of Chapter 6:

“The direct and indirect impacts have been considered with reference to the following study area extents as shown in Diagram 6.2 (reproduced in Figure 2.10.1):

- *Direct Study Area – The Proposed Scheme (i.e. the transport network within the red line boundary); and*
- *Indirect Study Area – This is the area of influence the Proposed Scheme has on changing traffic volumes above a defined threshold with reference to TII’s Traffic and Transport Assessment Guidelines (May 2014)”*

Figure 2.10.1 below is diagram 6.2 from Chapter 6 which shows the direct and indirect study areas.



Figure 2.10.1: Diagram 6.2 Direct and Indirect Study Area Extents for the Traffic and Transport Chapter

Section 6.2.2.1 of Chapter 6 Traffic and Transport of Volume 2 of the EIAR states the following:

“To determine the traffic and transport 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 Transport Infrastructure Ireland’s (TII) most recent Traffic and Transport Assessment Guidelines (TII 2014). This document is considered best practice guidance for the assessment of transport impacts related to changes in traffic flows due to proposed developments and is an appropriate means of assessing the impact of general traffic trip redistribution on the surrounding road network. According to Section 1.3 of the Traffic and Transport Assessment Guidelines (TII 2014):

‘a Traffic and Transport Assessment is a comprehensive review of all the potential transport impacts of a proposed development or re-development, with an agreed plan to mitigate any adverse consequences’.

The guidelines aim to provide a framework to promote an integrated approach to development, ensuring that proposals promote more efficient use of investment in transportation infrastructure which reduces travel demand and promotes road safety and sustainable travel.

The TIA, which supports this EIAR chapter, follows the Traffic and Transport Assessment Guidelines and offers an impartial description of the likely impacts of the Proposed Scheme, outlining both its positive and negative aspects.”

Section 6.2.4.3 of Chapter 6 states:

“The methodology used for determining the predicted magnitude of impacts has considered the traffic and transport conditions of the environment before and after the Proposed Scheme is in place.

The impact assessments have been carried out using the following scenarios:

- *‘Do Nothing’ – The ‘Do Nothing’ scenario represents the current baseline traffic and transport conditions of the direct and indirect study areas without the Proposed Scheme in place, which has been outlined in Section 6.3 (Baseline Environment). This scenario forms the reference case by which to compare the Proposed Scheme (‘Do Something’) for the qualitative assessments only.*
- *‘Do Minimum’ – The ‘Do Minimum’ scenario (Opening Year 2028, Design Year 2043) 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, without the Proposed Scheme in place. This scenario forms the reference case by which to compare the Proposed Scheme (‘Do Something’) for the quantitative assessments. Further detail on the scheme and demand assumptions within this scenario are included further below in section 6.4.3.*
- *‘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). The Do Something scenario has been broken into two phases:*
 - *Construction Phase (Construction Year 2024) – This phase represents the single worst-case period which will occur during the construction of the Proposed Scheme.*
 - *Operational Phase (Opening Year 2028, Design Year 2043) – This phase represents when the Proposed Scheme is fully operational.*

The changes between the Do Minimum and Do Something scenarios have been presented in either a positive, negative or neutral magnitude of impacts as a result of the Proposed Scheme, depending on the assessment topic. A high, medium, low or negligible rating has been applied to each impact assessment to determine the Magnitude of Impact.”

As noted in section 6.4.6.2.8.2 Significance of the General Traffic Impact of Chapter 6 Traffic & Transport of the EIAR:

“To determine the impact that the Proposed Scheme has in terms of general traffic redistribution on the direct and indirect study areas, the LAM Opening Year 2028 model results have been used to identify the difference in general traffic flows between the ‘Do Minimum’ and ‘Do Something’ scenarios and the associated level of traffic flow difference as a result of the Proposed Scheme. The assessment has been considered with reference to both the reductions and increases in general traffic flows along road links”.

As noted in section 6.4.6.2.8.9 of Chapter 6 of the EIAR:

“Overall, it has been determined that the impact of the reduction in general traffic flows along the Proposed Scheme will be Positive, Significant and Long-term whilst the impact of the redistributed general traffic along the surrounding road network will be Negative, Slight and Long-term. It should be noted that while Significant effects have been identified, these are at a small number of individual junctions, and effects will be short-lived and localised. This level of congestion is acceptable according to national guidance.

Section 3.4.2 of DMURS (2019) recognises that a certain level of traffic congestion is an inevitable feature within urban networks and that junctions may have to operate at saturation levels for short periods of time during the peak hours of the day. Chapter 1 of the Smarter Travel Policy Document also acknowledges that it is not feasible or sustainable to accommodate continued demand for car use. It should therefore be considered that the traffic congestion that is outlined in the impact assessment is acceptable with regard to the urban location of the area and in the context of the increased movement of people overall and by sustainable modes in particular. Therefore, the proposed impacts are considered acceptable when considered against the Scheme Objectives. Given that the redistributed traffic will not lead to a significant deterioration of the operational capacity on the surrounding road network, no mitigation measures have been considered to alleviate the impact outside of the direct study area.”

In addition, in order to minimise general traffic levels on side streets, a number of offline traffic management measures have been introduced.

2.10.2.6 Planning Documentation

Summary of issue

Submissions stated that it was difficult to ascertain the proposed impacts of the scheme with large amounts of data referring to high level statistical philosophy or methodology and data manipulation, which is beyond the ability to interpret by the public.

These submissions also stated that due to the volume of documents online, it is confusing to follow, and that relevant drawings and documents relating to specific locations are not easily found.

Submissions noted that the scheme is not adequately described.

A submission also noted that the structure of the data is difficult for third parties to determine the impact of the proposals.

A submission affirmed that the document lacked a clear executive summary and was not laid out in a way that is easily understood.

A submission stated that there has been limited, clear and accessible information available to residents of Stoneybatter.

Submissions also stated that the information supplied by the NTA was inadequate and was not available in a clear and understandable format especially for non-professionals. It was also suggested that drawings condensed into pdfs resulted in text being unreadable.

A submission questioned why 3D maps were not used as a visual aid.

It is further noted that changes during the various stages of public consultation are not signposted.

Response to issue

The NTA notes the comment regarding the technical nature and volume of the documents presenting a potential barrier to the lay person seeking access to information relating to the scheme. Given the nature of such infrastructure schemes as BusConnects, there is invariably a substantial amount of technical information which needs to be provided, so as to ensure that the consent application is comprehensive in nature to meet legislative requirements and provide the competent authority with the necessary information to allow them to reach a decision. Chapter 1 in Volume 2 of the EIAR contains information on the content and structure of the EIAR. Section 1.5.6 of Chapter 1 sets out the information which must be contained in the EIAR. The NTA has sought make the information as concise as possible, but while ensuring that the necessary information has been provided. Section 1.5.7 of Chapter 1 sets out the structure of the EIAR. It is considered that the structure of the EIAR does provide the necessary legibility for those interested parties (both lay persons and technical specialists) to find the information of relevance to them. While the EIAR has been prepared in compliance with the EIA Directive, it has also been written to make it accessible to a wider, non-specialist audience in so far as possible. Where technical terminology is used, an explanation is provided in the text, and / or in the glossary of terms which is provided at the beginning of Volume 2 of the EIAR.

A description of the Proposed Scheme is given in Chapter 4 Proposed Scheme Description of Volume 2 of the EIAR. The scheme description is divided into geographical sections.

The description of the scheme is supported by a series of drawings which are contained in Volume 3 of the EIAR and each drawing title is labelled includes a description e.g. Landscaping General Arrangement. A key plan is included within each drawing set to aid in understanding where each individual drawing is referring to on the scheme.

In addition, section 1.9 table 1.1 in Preliminary Design Drawings of the Supplementary Information provides further detail on what is contained within each drawing set.

In terms of signposting what changes were made to the Proposed Scheme at each stage, sections 3.4.2, 3.4.3 and 3.4.4 of Chapter 3 Reasonable Alternatives lists key changes at each public consultation stage.

In addition, the Preferred Route Option Report in the Supplementary Information lists the main scheme changes between the Emerging Preferred Route Option and the Preferred Route Option.

The Public Consultation Submission Reports appended to the Preferred Route Option Report in the Supplementary Information lists out the issues raised at each consultation stage, along with the response from the NTA to each of the issues, which includes details of changes made to the proposed design of the scheme.

2.10.2.7 Road Traffic and Roads Bill 2021

Summary of issue

Submissions stated that the CPO process is premature as it should wait for the enforcement of the Road Traffic and Roads Bill 2021.

The submissions went on to state that the Bill proposed one amendment that is relevant to the Proposed Scheme and noted that the CPO relies on a number of statutory provisions, including section 44 of the Dublin Transport Authority Act 2008. It noted that this section is to be amended by the above Bill in two ways, most notably by the insertion of section 44(6A), which will give powers to the NTA to exercise in this CPO. The submission concluded that the current CPO application is thus invalid.

Response to issue

As set out in Section 1.4 of the EIAR, the NTA made a decision under section 44(2)(b) of the Dublin Transport Authority Act 2008 (as amended) (the “2008 Act”) on 18 October 2019 that it considered it to be more convenient, more expeditious, more effective or more economical that the functions in relation to the provision of the public transport infrastructure be performed by it in relation to this Proposed Scheme among others.

Section 44(6) of the 2008 Act provides:

“(6) Where –

(a) a decision is made by the Authority under subsection (2)(b) or (5)(a) for the performance of a particular function otherwise than through a public transport authority or statutory body, or

(b) the Authority is performing its function of securing the provision of public transport infrastructure in accordance with subsection (2)(e),

the following provisions have effect –

- i. the Authority shall be empowered (notwithstanding any other enactment) to perform the function, including the acquisition of land for that purpose, and to do any other thing which arises out of or is consequential on or is necessary for the purposes of or would facilitate the performance of the function,
- ii. for the purpose of paragraph (a) or (b), land may be acquired 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 NTA is entirely satisfied that, pursuant to section 44(6) as quoted above, it has the necessary power to make the CPO for this Proposed Scheme.

The proposed legislative amendment by the insertion of section 44(6A) into the 2008 Act which is currently going through the legislative process is not required as is suggested by this submission for the CPO that was made here as it is very clear from section 44(6)(ii) that the NTA clearly has the powers to CPO. In fact, the proposed section 44(6A) clearly states that it is without prejudice to section 44(6)(ii) that is referenced to above.

Further, as noted by the Minister for Transport in the Select Committee on Transport and Communications Debate on this legislation on 22 June 2022, following advice from the Attorney General, the words “*Without prejudice to the generality of subsection (6)(ii)*” were inserted into the draft bill. The Minister stated that “*this amendment is intended to make clear that this power is without prejudice to existing powers in the Act, given that the NTA already has general powers to acquire land under section 44(6)(ii) of the DTA Act*”.

2.10.2.8 Providing for Mobility Impaired Users

Summary of issue

Submissions stated that the less able and mobility impaired users will be impacted by the Proposed Scheme. Concerns are centred around cycle lanes running alongside footpaths and at bus stops.

Some submissions stated that the bus is not a viable option for mobility impaired users or the elderly who use their cars to access services, shops etc.

A submission requested that people who carry a disability pass should be able to pass through the Bus Gates and questioned what reference to the safety of disabled users have been applied to the Proposed Scheme.

Response to issue

Section 4.6.5 Accessibility for Mobility Impaired Users of Chapter 4 Proposed Scheme Description of Volume 2 of the EIAR, outlines *the following non exhaustive list of relevant standards and guidelines that have informed the approach to Universal Design in developing the Proposed Scheme:*

- *Preliminary Design Guidance Booklet for BusConnects Core Bus Corridors (NTA 2020);*
- *Building for Everyone: A Universal Design Approach (NDA 2020);*
- *UK DfT Guidance on the use of tactile paving surfaces; and*
- *BS8300:2009 +A1:2010 Design of buildings and their approaches to meet the needs of disabled people – Code of practice*

The Disability Act 2005 (as amended) places a statutory obligation on public service providers to consider the needs of disabled people. An Accessibility Audit of the existing environment along the proposed scheme was undertaken, as per Appendix I of the Preliminary Design Report.

The Accessibility Audit provided a description of the key accessibility features and potential barriers to mobility impaired people based on good practice. The Accessibility Audit was undertaken in the early design stages with the view to implementing any key measures identified as part of the design development process. Measures to address the noted issues are noted in the Accessibility Audit - Designers Response, also in Appendix I.

In achieving the enhanced pedestrian facilities there has been a concerted effort made to provide clear segregation of modes at key interaction points along the Proposed Scheme which was highlighted as a potential mobility constraint in the Accessibility Audit. In addressing one of the key aspects to segregation, the use of the 60mm set down kerb between the footway and the cycle track is of particular importance for guide dogs, whereby the use of white line segregation is not as effective for establishing a clear understanding of the change of pavement use and potential for cyclist/pedestrian interactions.

One of the other key areas that was focused on was the interaction between pedestrians, cyclists and buses at bus stops. 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 bus stops which is further elaborated in section 4.14.4 and 4.14.5 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, accessibility audits and road safety audits.

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.

The impact on roads adjacent to the proposed Bus Gate locations is detailed in section 2.3.3 of this report. As noted, access to all roads is available via the surrounding road network.

The Proposed Scheme provides a balance between providing bus priority through Old Cabra Road, Prussia Street and Manor Street / Stoneybatter, in parallel with discouraging through traffic at all times, while also ensuring that access by car to local streets and businesses, shops etc. is maintained.

Two disabled parking spaces will be retained on Manor Street as existing.

2.10.2.9 Consideration of Dart+ West

Summary of issue

A submission raised concerns that passenger movements and traffic impacts from Dart+ West has not been considered in the design of the Proposed Scheme.

A submission noted that it is unclear as to whether there is any communication / liaison between applicants on the effects on the area and the wider Dublin 15 area from both plans.

The submission noted that there is a proposal to make Ashtown Road a cul de sac, cutting off pedestrian communities on both sides, i.e, Ashtown/Navan Road areas and the new area of Pelletstown, with a footbridge to cross over. It is noted that the car traffic will be directed into a tunnel under the Royal Canal, and the rail lines, coming out at Ashtown, directly unto the Navan Road at the current Halfway House roundabout site. Residents in Dublin 15 claim that road diversions have led to even more car traffic in their area and are concerned about the effect this will have on the Navan Road area.

Response to issue

Section 4.6.6 of Chapter 4, Proposed Scheme Description states that one of the objectives of the Proposed Scheme is to *enhance interchange between the various modes of public transport operating in Dublin City and wider metropolitan area.*

The Proposed Scheme facilitates improved existing and new interchange opportunities with other transport services including future rail public transport services including DART+ and MetroLink.

To determine the traffic and transport 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 Transport Infrastructure Ireland's (TII) most recent Traffic and Transport Assessment Guidelines (TII 2014). This traffic impact assessment compares a 'Do Minimum scenario' and a 'Do Something scenario'. The core reference case (Do Minimum) modelling scenarios (Opening year - 2028 and Design year - 2043) are based on the progressive roll-out of the Greater Dublin Area (GDA) Transport Strategy 2016-2035 (GDA Strategy), with a partial implementation by 2028, in line with National Development Plan (NDP) investment priorities and the full implementation by 2043. The Do Something scenario represents the likely conditions of the direct and indirect study areas with the Proposed Scheme in place.

The 2043 '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 CBC elements).

As outlined above, the 2043 Do Minimum scenario assumes the full implementation of the GDA Strategy schemes, so therefore assumes that proposed major transport schemes such as MetroLink, DART+ and Luas line extensions to Lucan, Finglas and Bray are all fully operational.

Table 6.50 and 6.51 in Chapter 6, Traffic and Transport of Volume 2 of the EIAR outline the difference in modal split between the Do Minimum scenario and the Do Something scenario during AM and PM peak times respectively in 2043. These show a decrease in general traffic of 14% and 19%, as a result of the Proposed Scheme at AM and PM peak times respectively.

2.10.2.10 Carbon emissions

Summary of issue

Submissions stated that there will be increased CO₂ emissions due to increased journeys for local residents as a result of the proposed traffic management measures.

A submission called for a reduction in carbon emissions.

Response to issue

Section 8.8.2 of Chapter 8 Climate of volume 2 of the EIAR states:

“The maintenance CO₂e emissions associated with the Operational Phase of the Proposed Scheme, after mitigation, is predicted to be Negative, Significant and Permanent. The operational traffic CO₂e emissions associated with the Operational Phase of the Proposed Scheme is predicted to be Neutral and Permanent. Thus, the residual impact from Operational Phase traffic as a result of the Proposed Scheme will be Neutral and Permanent. Overall, when the carbon emissions associated with the maintenance phase and the operational phase are combined, the net GHG emissions will be Neutral and Permanent. Thus, the residual impact from Operational Phase traffic as a result of the Proposed Scheme will be Neutral and Permanent.

The Proposed Scheme will also support the delivery of government strategies outlined in the CAP (DCCAE 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.

Based on the analysis outlined above, 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 14,800 and 14,700 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) (DCCAE 2021).

It is concluded that, the Proposed Scheme will make a significant contribution to reduction in carbon emissions.”

2.10.2.11 Need for the Proposed Scheme

Summary of issue

A number of submissions questioned the need for the scheme and noted that there are other transport options available.

A submission suggested that the proposals are unnecessary as there are no issues with traffic on Old Cabra Road and Prussia Street. The submission stated that the road functions perfectly for buses, bicycles and cars, and public transport cannot be used during a pandemic.

A submission also noted that public transport is becoming unsafe for the public to use.

A submission stated that there are many things that cannot be done using public transport that can be done in a private car, for example large shopping.

A submission stated that they did not believe there was any need for core bus corridor infrastructure works as the current bus routes from Blanchardstown/Castleknock and Ongar are adequate. In addition, the submission suggested that the current cycle lanes are adequate.

Response to issue

As noted in section 2.3.4.1 of Chapter 2 on Volume 3 of the EIAR:

“The National Transport Authority’s (NTA) Transport Strategy for the Greater Dublin Area 2016 - 2035 (hereafter referred to as the GDA Transport Strategy) (NTA 2016a) has been prepared in accordance with Section 12 of the Dublin Transport Authority Act 2008 (as amended) and was approved in April 2016 by the Minister for Transport, Tourism and Sport. The GDA Transport Strategy is an essential component for the orderly development of the GDA over the next 20 years. The purpose and primary objective of the GDA Transport Strategy is ‘to contribute to the economic, social and cultural progress of the Greater Dublin Area by providing for the efficient, effective and sustainable movement of people and goods’.”

As stated in section 2.1.2 of the Preferred Route Option Report within the Supplementary Information to the EIAR:

“The delivery of an efficient reliable bus service is an essential component of the GDA Transport Strategy as it will provide a viable and readily accessible alternative to private general traffic that is causing congestion problems in the GDA. As Dublin is a low density city there are few areas with the size and concentration of population for rail based public transport. This means that for most corridors in Dublin, bus travel represents the optimum form of public transport.”

“The GDA Transport Strategy states that it is intended to provide continuous bus priority, as far as is practicable, along the core bus routes of the city, with the objective of supporting a more efficient and reliable bus service with lower journey times, increasing the attractiveness of public transport in these areas and facilitating a shift to more sustainable modes of transport.”

The need for the Proposed Scheme is comprehensively outlined in Chapter 2 Need for the Proposed Scheme in Volume 2 of the EIAR. It outlines the policy context for the Proposed Scheme as well as the regional and local transport need for the Proposed Scheme. Section 2.1 notes the following:

“The key radial traffic routes into and out of Dublin City Centre are characterized by poor bus and cycle infrastructure in places. Effective and reliable bus priority depends on a combination of continuous bus lanes and signal control priority at pinch-points and junctions.

Currently bus lanes are available for 25% of the Blanchardstown to City Centre route, with no signal control priority for buses. Cyclists must typically share space on bus lanes or general traffic lanes with only 9% of the route providing segregated cycle tracks and 34% of the route providing non-segregated cycle lanes. Furthermore, there are key sections of the current bus lanes that are not operational on a 24-hour basis in addition to being shared with car parking facilities and cyclists which compromises the reliability and effectiveness of the bus services in these areas.

Private car dependence has resulted in significant congestion that has impacted on quality of life, the urban environment, and road safety. The population of the Greater Dublin Area (GDA) is projected to rise by 25% by 2040 (National Planning Framework, 2018), reaching almost 1.5 million. This growth in population will increase demand for travel necessitating improved sustainable transport options.

Without intervention, traffic congestion will lead to longer and less reliable bus journeys throughout the region and will affect the quality of people’s lives. The Proposed Scheme is needed in order to enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor through the provision of enhanced walking, cycling and bus infrastructure on this key access corridor in the Dublin region.”

2.10.2.12 Future housing developments

Summary of issue

Submissions stated that there are redevelopment plans for Dalymount and O’Devanny. The submissions also stated that there are three student accommodation sites being built and a large number of high-rise apartments under construction on Ratoath Road and in Cabra West. The submissions stated that these were not considered and suggested that these new and future developments will result in increased traffic in the area.

Response to issue

Section 2.1 of Chapter 2 Need for the Proposed Scheme of Volume 2 of the EIAR states:

“Sustainable transport infrastructure assists in creating more sustainable communities and healthier places to live and work while also stimulating our economic development and contributes to enhanced health and well-being when delivered effectively.

The key radial traffic routes into and out of Dublin City Centre are characterized by poor bus and cycle infrastructure in places. Effective and reliable bus priority depends on a combination of continuous bus lanes and signal control priority at pinch-points and junctions. Currently bus lanes are available for 25% of the Blanchardstown to City Centre route, with no signal control priority for buses. Cyclists must typically share space on bus lanes or general traffic lanes with only 9% of the route providing segregated cycle tracks and 34% of the route providing non-segregated cycle lanes. Furthermore there are key sections of the current bus lanes that are not operational on a 24-hour basis in addition to being shared with car parking facilities and cyclists which compromises the reliability and effectiveness of the bus services in these areas.

Private car dependence has resulted in significant congestion that has impacted on quality of life, the urban environment, and road safety. The population of the Greater Dublin Area (GDA) is projected to rise by 25% by 2040 (National Planning Framework, 2018), reaching almost 1.5 million. This growth in population will increase demand for travel necessitating improved sustainable transport options.

Without intervention, traffic congestion will lead to longer and less reliable bus journeys throughout the region and will affect the quality of people's lives. The Proposed Scheme is needed in order to enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor through the provision of enhanced walking, cycling and bus infrastructure on this key access corridor in the Dublin region. The objectives of the Proposed Scheme 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 movements 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; and*
- *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 transport infrastructure and seek to enhance key urban focal points where appropriate and feasible.*

The objectives outlined above relating to enhancing capacity of the public transport system and enhancing safe infrastructure for cycling are underpinned by the central concept and design philosophy of 'People Movement'. People Movement is the concept of the optimisation of roadway space and / or the prioritisation of the movement of people over the movement of vehicles along the route and through the junctions along the Proposed Scheme.

The aim is to the reduce journey times for modes of transport with higher person carrying capacity (bus, walking and cycling), which in turn provides significant efficiencies and benefits to users of the transport network and the environment. ”

2.10.2.13 Bus journey time and reliability

Summary of issue

Submissions questioned what the measurable commuting time benefits into the city centre are for the scheme and questioned if this has this been assessed against the impact on residents.

A submission stated that removing trees in order to decrease bus journey times by 10 minutes serves no purpose.

A submission stated that the proposed changes to the layout of the Navan Road at the Ashtown Roundabout end are disproportionate to the potential gains for commuters and residents. The submission noted that congestion on the Navan Road occurs between Ratoath Road/ Cabra Road junction and the Kinvara Avenue/ Navan Road junction however, stated that once past this point westbound traffic flows freely. Therefore, the submission stated that changes to this section of the scheme at the Ashtown end of Navan Road will not contribute significantly to the five minutes saved on a journey lasting approximately 30 minutes.

Response to issue

Section 6.4.6.2.5.2 Bus Journey Time and Reliability changes as a result of the Proposed Scheme of Chapter 6 of Volume 2 of the EIAR states:

“To give an overview of how the Proposed Scheme will impact on bus journey times along the corridor, outputs for the B3 service, which traverses the entire length of the Proposed Scheme, have been extracted from the model. The assessment is based in the context of the full implementation of the BusConnects network re-design in both the Do Minimum and Do Something scenarios, with the Proposed Scheme servicing the B-Spine services. “

“Based on the results presented in Table 6.54 (reproduced in Table 2.10.2 below), the Proposed Scheme will deliver average inbound journey time savings for B3 service bus passengers of up to 5.7 minutes (16%) in 2028 (AM) and 5.5 minutes (15%) in 2043 (AM). Furthermore, results presented in Diagram 6.15 suggest an improvement in bus journey time reliability in all four scenarios as indicated by the reduced ranges of journey times achieved with the individual durations focused much closer to the average journey times (lower standard deviation) in the Do Something scenario (blue dots) with the Proposed Scheme in place compared to the more dispersed range in the Do Minimum scenario (red dots). Note that the variation in journey times shown above are based on one set of predicted flows for the Do Minimum and Do Something scenario.

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.”

Table 2.10.2: B3 Service Bus Average Journey Times (Inbound Direction)

Peak Hour	Do Minimum (minutes)	Do Something (minutes)	Difference (minutes)	% Difference
2028 AM	35.7	30.0	-5.7	-16%
2028 PM	34.6	29.6	-4.9	-14%
2043 AM	35.7	30.2	-5.5	-15%
2043 PM	34.2	29.8	-4.4	-13%

“Based on the results presented in Table 6.54 (reproduced in Figure 2.10.2), the Proposed Scheme will deliver average inbound journey time savings for B3 service bus passengers of up to 5.7 minutes (16%) in 2028 (AM) and 5.5 minutes (15%) in 2043 (AM). Furthermore, results presented in diagram 6.15 (reproduced in Figure 2.10.2) suggest an improvement in bus journey time reliability in all four scenarios as indicated by the reduced ranges of journey times achieved with the individual durations focused much closer to the average journey times (lower standard deviation) in the Do Something scenario (blue dots) with the Proposed Scheme in place compared to the more dispersed range in the Do Minimum scenario (red dots).”

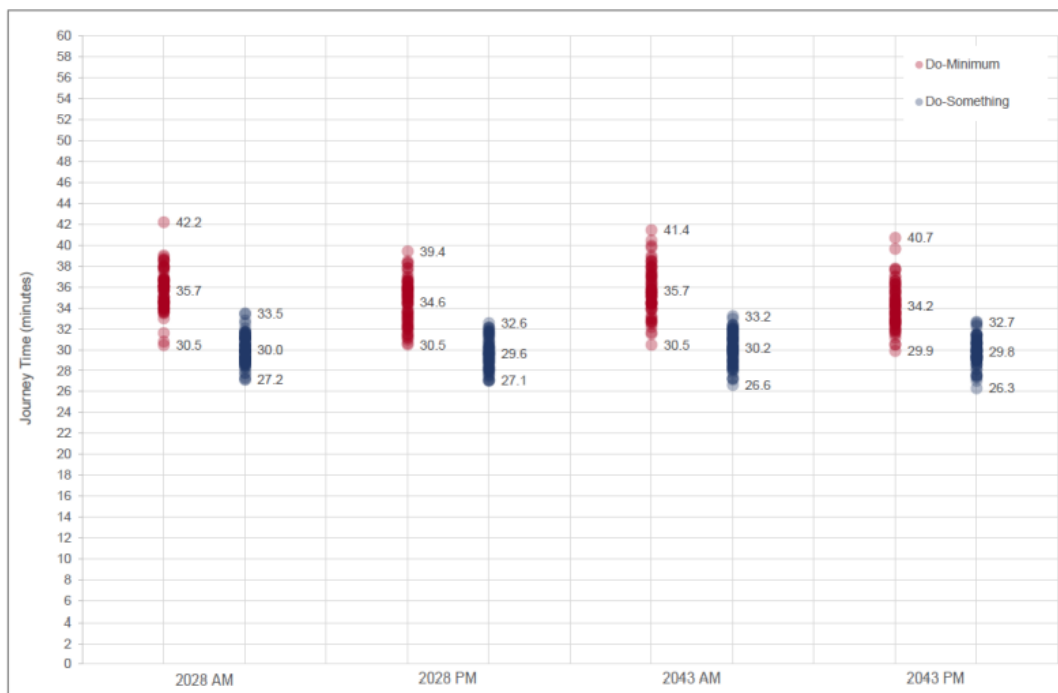


Figure 2.10.2: B3 Bus Journey Times (Inbound)

Note that the variation in journey times shown above are based on one set of predicted flows for the Do Minimum and Do Something scenario. 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.

Section 6.4.6.2.5.3 of Chapter 6 states: *The change in total bus journey time for all buses travelling along the Proposed Scheme, is shown in Table 6.58 (reproduced in Table 2.10.3 below) in vehicle minutes.*

Table 2.10.3: Total Bus Journey Times

Peak Hour	Do Minimum (vehicle.minutes)	Do Something (vehicle.minutes)	Difference (vehicle.minutes)	%Difference
2028 AM	2021	1809	-212	-10%
2028 PM	2098	1799	-300	-14%
2043 AM	2015	1808	-207	-10%
2043 PM	2057	1805	-252	-12%

Based on the results presented in Table 6.58 (reproduced in Table 2.10.3 above), modelling shows that the Proposed Scheme will reduce total bus journey times along the Proposed Scheme by up to 14% in 2028 and 12% in 2043. Based on the AM and PM peak hours alone, this equates to 8.5 hours of savings in 2028 and 7.7 hours in 2043 combined across all buses when compared to the Do Minimum. On an annual basis this equates to approximately 6,400 hours of bus vehicle savings in 2028 and 5,800 hours in 2043, when considering weekday peak periods only. The savings are slightly lower in 2043 compared to 2028 due to slightly lower vehicle minutes in the Do Minimum, particularly in the PM. The Do Something vehicle minutes remain largely consistent between both years and time periods.

Section 6.4.6.3 of Chapter 6 states:

“The Proposed Scheme will address sustainable mode transport infrastructure deficits while contributing to an overall integrated sustainable transport system as proposed in the GDA Strategy. It will increase the effectiveness and attractiveness of bus services operating along the corridor and will result in more people availing of public transport due to the faster, more reliable journey times which the Proposed Scheme provides. This in turn will support the future increase to the capacity of the bus network and services operating along the corridor and thereby further increasing the attractiveness of public transport.

In addition to this, the significant segregation and safety improvements to walking and cycling infrastructure that is a key feature of the Proposed Scheme will further maximise the movement of people travelling sustainably along the corridor. The combined effect of these changes will therefore cater for higher levels of future sustainable population and employment growth.

In the absence of the Proposed Scheme, bus services will be operating in a more congested environment, leading to higher journey times and lower reliability for bus journeys. This limits their attractiveness to users, and this will lead to reduced levels of public transport use, making the bus system less resilient to higher levels of growth. The absence of walking and cycling measures that the Proposed Scheme provides will also significantly limit the potential to grow those modes into the future.

On the whole, the Proposed Scheme will make a significant contribution to the overall aims of BusConnects that is a key part of the GDA Strategy and will enable the city to grow sustainably into the future. This would not be possible in the absence of the Proposed Scheme.”

3. Response to Objections to the Compulsory Purchase Order (CPO)

3.1 Overview of Objections

This chapter of the report addresses the 32 written objections that were received by the Board against the Proposed Scheme under ABP Case Number ABP-313892 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: CPO Objection Locations

CPO Ref No.	Location	CPO Ref No.	Location	CPO Ref No.	Location
1	Blanchardstown Shopping Centre	12	22 Belleville, Blackhorse Avenue	23	116 Navan Road
2	R147 Navan Road (Circle K Service Station)	13	387 Navan Road	24	139 Navan Road
3	349 Navan Road	14	Phoenix Industrial Estate (Unit 5)	25	Phoenix Park Racecourse
4	291 Navan Road	15	Belville Apartments, Blackhorse Avenue	26	Aras Slainte, Navan Road
5	199 Navan Road	16	309 Navan Road	27	269 Navan Road
6	383 Navan Road	17	267 Navan Road	28	271 Navan Road
7	114 Navan Road	18	309 Navan Road	29	Tesco, Park Shopping Centre, Prussia Street
8	305 Navan Road	19	265 Navan Road	30	Apartment 30, Millrace Road, Phoenix Park Racecourse
9	1 & 3 Herbert Road (Mill Road)	20	313 Navan Road	31	137 Navan Road
10	287 Navan Road	21	149 Navan Road	32	151 Navan Road
11	200 Navan Road	22	9 Fairhaven Walk, Castleknock Road		

3.2 Responses to Individual CPO Objections

3.2.1 CPO-01 – Blanche Retail Nominee Limited

3.2.1.1 *Summary of Observations Raised*

It is noted that this submission is not an objection to the CPO as explained below.

The submission from Blanche Retail Nominee Limited, as owners of lands at the Blanchardstown Centre, Blanchardstown Town Centre, expressed full support for the proposed infrastructure development following detailed discussions with the NTA during development of the Proposed Scheme in advance of the planning application.

The submission confirmed they had signed Heads of Agreement with the NTA, subject to Agreement for Lease, currently being finalised.

This will allow the scheme to proceed on the lands owned by Blanche Retail Nominee without the requirement for CPO, instead proceeding on the basis of mutual satisfaction and cooperation on behalf of the stakeholders.

The submission went on to state that the agreement also confirms that any development within Blanchardstown Town Centre can proceed, subject to planning consent, alongside the delivery of Blanchardstown to City Centre Core Bus Corridor Scheme, subject to ensuring compatibility and agreement with the NTA.

3.2.1.2 *Response to Observations Raised*

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

The NTA is continuing to work with Blanche Retail Nominee Limited to finalise the Agreement for Lease referenced in their submission. However, until such time as an agreement is finalised and executed between the parties, the lands at this location are appropriately included in the Compulsory Purchase Order and are absolutely necessary and required for the construction of the Proposed Scheme NTA to provide additional wording.

3.2.2 CPO-02 – Circle K Ashtown Service Station (Navan Road)

3.2.2.1 *Description of the Proposed Scheme at this location*

In order to achieve the Proposed Scheme objectives along this section of the corridor on the R147 Navan Road, as described in section 4.5.3.1 of Chapter 4 of Volume 2 of the EIAR, the Proposed Scheme will facilitate a new bus lane, which will operate along the inner lanes of both the inbound and outbound carriageways, in conjunction with two lanes of general traffic in each direction. The carriageways are separated by a landscaped median of varying width. A footpath is provided in the inbound direction while a footpath and two-way cycle track is provided along the outbound carriageway. The two-way cycle track and footpath along the outbound carriageway will tie into the existing Castleknock Manor. Permanent and temporary land take is required at the Circle K Ashtown Service Station.

The existing road cross section in this location consists of three carriageway lanes in each direction, one inner bus lane and two general traffic lanes, separated by a landscaped median of varying width. A footpath is provided in each direction.

In order to achieve the desired design for the Proposed Scheme, permanent and temporary land acquisition is proposed from a number of properties including the Circle K Ashtown Service Station. At this property the maximum width of land to be permanently acquired is approximately 0.7m. This will require modification of the existing access junctions to the property.

The relevant extract from the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description is shown in Figure 3.2.1, the existing aerial view in Figure 3.2.2, and existing street view in Figure 3.2.3.

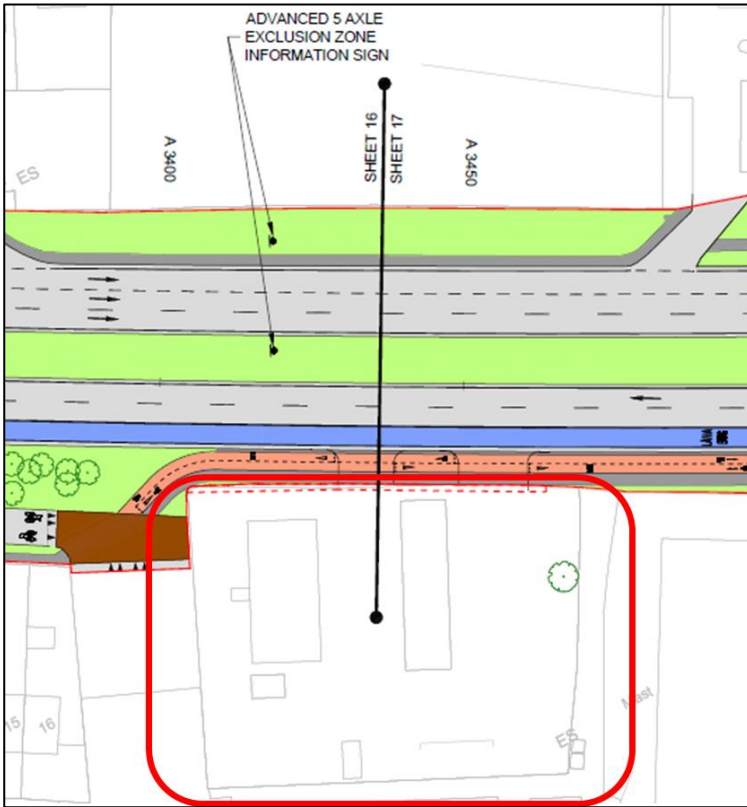


Figure 3.2.1: Proposed new Layout at the Circle K Service Station, Navan Road



Figure 3.2.2: Existing aerial view at the Circle K Service Station, Navan Road (Image Source: Google)



Figure 3.2.3: Existing Street View the Circle K Service Station, Navan Road (Image Source: Google)

3.2.2.2 Summary of Observations Raised

This submission objected to the Proposed Scheme and raised the following issues:

1. Impact to business and operations

The submission raised concerns over the permanent CPO and the resulting impact to business and operations citing potential impacts to the existing fuel canopy structure, fuel signage and fuel infrastructure.

2. Impact to operations during construction

The submission raised concerns over the impact and disruption to business operations during the construction phase of the Proposed Scheme and also highlighted that this may result in a permanent impact on operations.

3.2.2.3 Response to Observations Raised

1. Impact to business and operations

At the entrance to the Circle K Ashtown Service Station, an area of land is required to be permanently acquired to facilitate construction of the footpath of the proposed scheme and tie-in the existing service station access. The area of land to be permanently acquired is approximately 40m² (a maximum width of approximately 0.7m). In order to facilitate the proposed cross-section at the Ashtown Service Station, minor adjustments to the existing footpath levels are necessary where it ties in with the access points to the property. Subsequently, an additional area of land is required to be temporarily acquired, 61m² in area (a general width of 1.0m), to facilitate surface tie-in regrade works to the yard and access points of the property.

The proposed works will modify the existing entry and exit points of the forecourt to the service station to facilitate tie-in. As a result of the realigned footpath, which encroaches towards the forecourt area by a maximum of 0.3m, there is a minor impact to the existing forecourt area. The operational ability of the forecourt remains unchanged and the arrangement of how vehicles access the fuelling points of the service station is not affected by the Proposed Scheme. Therefore, it is not envisaged that the Proposed Scheme will impact on business operations.

While the Proposed Scheme will require modification of the existing accesses to ensure appropriate tie-in as described above, impacts to the existing fuel canopy structure, fuel infrastructure and permanent signage to the service station are not envisaged. However, as set out in section 19.5.1.1 of Chapter 19 of Volume 2 of the EIAR, *all possible precautions will be taken by the appointed contractor to avoid unplanned interruptions to any services during the Construction Phase of the Proposed Scheme. This will include appropriate investigation by the appointed contractor to identify the precise location of all existing service infrastructure within the working areas prior to the commencement of excavation works.*

Where works are required in and around known utility infrastructure, precautions will be implemented by the appointed contractor to protect the infrastructure from damage, in accordance with best practice methodologies and the requirements of the utility companies, where practicable. Protection measures during construction will include warning signs and markings indicating the location of utility infrastructure, safe digging techniques in the vicinity of known utilities, and in certain circumstances where possible, isolation of the section of infrastructure during works in the immediate vicinity.

Chapter 10 Population of Volume 2 of the EIAR assesses the impacts resulting from the acquisition of commercial land along the Proposed Scheme. Specifically in relation to the Circle K Ashtown Service Station the land take is considered to be minimal, and the impact of land take is assessed to be Negative, Not Significant and Long Term.

2. Impact to operations during construction

Chapter 5 Construction of Volume 2 of the EIAR describes details of the construction activities associated with the Proposed Scheme. Section 5.1 affirms that a competent contractor will be appointed to carry out the scheme works and presents details of the temporary traffic management measures, including the staging measures to be carried out to facilitate how the vehicles, cyclists and pedestrians will be impacted and safely catered for, during the works.

The roads and streets along the Proposed Scheme will remain open to general traffic wherever practicable during the Construction Phase. Works will be constructed ensuring disturbances to residents, businesses and road users are minimised while maintaining the flow of all modes of traffic along the route wherever practicable. However, lane closures, road closures and diversions may be necessary to facilitate construction.

The Proposed Scheme will be constructed in a manner which will minimise, as much as practicable, any disturbance to residents, businesses and road users. Road and street upgrade works will be completed in a Staged manner, as described in Section 5.8.3, whereby traffic of all modes will be managed to ensure construction can continue while ensuring the safety of all road users, and personnel, and maintaining flow of all modes of traffic wherever practicable.

The following is noted in section 5.5.3.2 Parking and Access of Chapter 5 Construction of Volume 2 of the EIAR:

“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. Details regarding temporary access provisions will be discussed with residents and business owners 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.”

Wider economic impacts of all the Core Bus Corridors are discussed in Appendix A10.2 (The Economic Impact of the Core Bus Corridors) (EY 2021) in Volume 4 of the EIAR and acknowledges that, although some businesses may experience some disruption, there is no evidence to suggest the impacts are anything other than temporary.

Appendix A10.2 in Volume 4 of the EIAR states:

“there may be some disruption to business during the construction phase, however once the new routes are open footfall should return to normal and may in fact rise.”

3.2.3 CPO-03 – Thomas Curtin & Karina O’Leary (349 Navan Road)

3.2.3.1 Description of the Proposed Scheme at this location

In order to achieve the Proposed Scheme objectives along this section of the corridor on the R147 Navan Road, as described in section 4.5.4.1 of Chapter 4 of Volume 2 of the EIAR, the Proposed Scheme will generally consist of a bus lane and general traffic lane in each direction, with one-way cycle tracks alongside the proposed inbound and outbound bus lanes, each adjacent to a footpath. Permanent and temporary land take will be required from a number of properties, with the majority being residential.

The existing signalised junction at Ashtown Grove is modified to incorporate enhanced protected cyclist facilities.

The existing road cross section in this location consists of a footpath and grass verge on both sides of the carriageway. One-way off-road cycle lanes are provided in each direction with one general traffic lane in the outbound direction and a bus lane and general traffic lane in the inbound direction.

In advance of the signalised junction with Ashtown Grove, the inbound bus lane terminates to facilitate a right-turn pocket into Ashtown Grove for outbound traffic.

In order to achieve the desired design for the Proposed Scheme, temporary land acquisition is proposed from a number of properties in this area including 349 Navan Road. At this property the width of land to be temporarily acquired is approximately 5.0m to accommodate re-grading of the driveway to tie in with the proposed back of footpath. Permanent land take is not proposed at this property.

The relevant extract from the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description is shown in Figure 3.2.4, the existing aerial view in Figure 3.2.5, and existing street view in Figure 3.2.6.

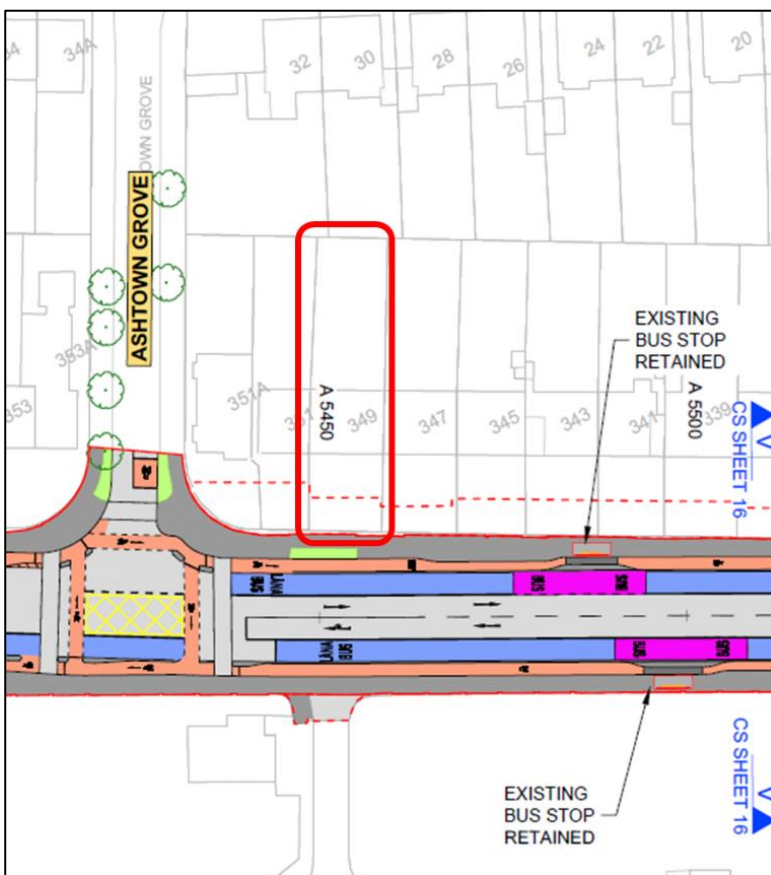


Figure 3.2.4: Proposed new Layout at 349 Navan Road



Figure 3.2.5: Existing aerial view at 349 Navan Road (Image Source: Google)



Figure 3.2.6: Existing Street View at 349 Navan Road (Image Source: Google)

3.2.3.2 Summary of Observations Raised

This submission raised the following observations:

1. Removal of Ashtown Roundabout
2. Traffic Impact
3. Road safety

4. Alternative measures (park and ride facilities)

5. Traffic signals for cyclists

The submission requested clarity over signal control measures for cyclists.

6. Removal and provision of trees

7. Noise and vibration

8. Air quality

9. Right turn lane removed at Ashtown Grove

The submission raised concern over the removal of the right-turn lane into Ashtown Grove which has the potential to cause traffic congestion due to the perceived high proportion of vehicles turning right here.

3.2.3.3 *Response to Observations Raised*

Detailed responses to the issues raised in points 1 to 4 and 6 to 8 of this submission are provided in sections 2.3.3 and 2.10.2 of this report.

5. Traffic signals for cyclists

As noted in Chapter 4 Proposed Scheme Description of Volume 2 of the EIAR, junctions along the Core Bus Corridor have been designed to facilitate a high level of safety, comfort, and priority for sustainable modes of travel (i.e. walking and cycling) and for public transport by prioritising the space and time allocated to these modes within the operation of a junction.

Section 5.3 ‘Junction Geometry Design’ of the Preliminary Design Report discusses the basis of junction design along the scheme whereby the provision for cyclists at junctions is a critical factor in managing conflict and providing safe junctions for all road users. Section 5.3 also outlines a number of junction types implemented along the scheme.

The principles of junction types adopted along the Navan Road scheme are based on either a Type 1 or Type 3 junction layout. These junctions facilitate protection through the provision of physical kerb build-outs to protect cyclists through the junction and offers priority for cyclists through staging of the signal phasing. The traffic signal arrangement also removes any uncontrolled conflict between pedestrians and cyclists. The nearby Ashtown Grove junction is based on a Type 1 layout and summarised within Table 5.2 of the Preliminary Design Report as below.

“Nearside bus lanes will be provided in both directions through the junction, with the inbound bus lane curtailed 20m from the junction to allow for left turn traffic (based on a Junction Type 1 layout). Cyclist and pedestrian crossing facilities will be provided, and an advanced stop line for cyclists will be provided on the side road.”

9. Right turn lane removed at Ashtown Grove

TIA Sub-Appendix 2 Junction Design Report of Volume 4 of the EIAR states the following for the Navan Road / Ashtown Grove Junction:

“Summary

Nearside bus lanes will be provided in both directions through the junction, with the inbound bus lane to be curtailed 20m from the junction to allow for left turn traffic. Cycle and pedestrians crossing facilities will be provided, and an advanced stop line for cyclists is to be provided on the side road.

Signal Operation

A four stage signal operation is proposed. Mainline traffic, buses and cyclists will operate in the same stage, with left turning vehicles to cross the bus lane path at a distance of 20m from the junction and give way to cyclists on flashing ambers. This will maximise green time for buses and minimise delay. An indicative arrow will provide priority for right-turning vehicles into Ashtown Grove. The side road will operate in its own stage with a flashing amber, followed by pedestrians and right-turning cyclists.”

It is noted within the Junction Design Report that the junction will operate within capacity, which includes vehicles being able to turn right into Ashtown Grove from Navan Road.

3.2.4 CPO-04 – Philip Dempsey (291 Navan Road)

3.2.4.1 Description of the Proposed Scheme at this location

In order to achieve the Proposed Scheme objectives along this section of the corridor on the R147 Navan Road, as described in section 4.5.4.1 of Chapter 4 of Volume 2 of the EIAR, the Proposed Scheme will generally consist of a bus lane and general traffic lane in each direction, with one-way cycle tracks alongside the proposed inbound and outbound bus lanes, each adjacent to a footpath. Permanent and temporary land take will be required from a number of properties in this area, with the majority being residential.

The existing road cross section in this location consists of a footpath, grass verge and on-road cycle lane on the inbound side of the road and a footpath and on-road cycle lane on the outbound side with one general traffic lane in each direction and a bus lane in the inbound direction.

At this property the width of land to be permanently acquired ranges between approximately 2.3m and 2.5m. This will require the relocation of the existing boundary wall and any adjacent vegetation.

The relevant extract from the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description is shown in Figure 3.2.7, the existing aerial view in Figure 3.2.8, and existing street view in Figure 3.2.9.

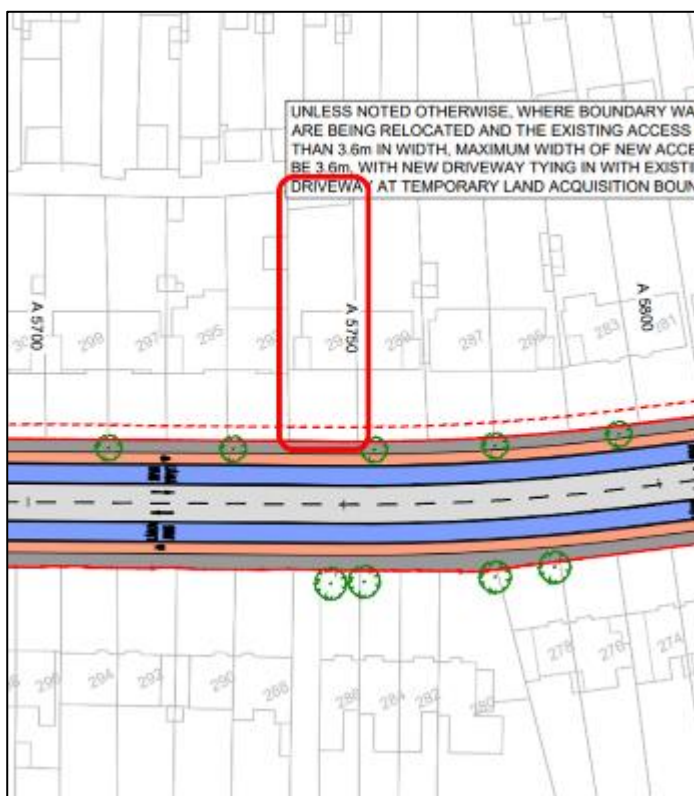


Figure 3.2.7: Proposed new Layout at 291 Navan Road



Figure 3.2.8: Existing aerial view at 291 Navan Road (Image Source: Google)



Figure 3.2.9: Existing Street View at 291 Navan Road (Image Source: Google)

3.2.4.2 Summary of Observations Raised

It is noted this submission raised an objection to the Proposed Scheme for the following reasons:

1. Safety resulting from proximity of vehicles to the property

The submission raised concerns about the proposal to locate road traffic closer to the property and the impact this would have on safety.

2. Noise and vibration
3. Air quality
4. Change in travel demand and patterns of travel due to COVID-19 pandemic
5. Impact on traffic
6. Increased traffic flows and associated safety issues and journey times

7. Impact on Prussia Street, Manor Street and Stoneybatter
8. Need for the Proposed Scheme
9. Alternative measures (congestion charging)
10. Consultation Process

3.2.4.3 *Response to Observations Raised*

Detailed responses to the issues raised in points 2 to 10 of this submission are provided in sections 2.2.3, 2.10.2, 2.4.3, and 2.5.3 of this report.

1. Safety resulting from proximity of vehicles to the property

The edge of the proposed nearest bus lane will be between 1.2m and 1.5m closer to the residence than the kerb of the existing bus lane. Additionally, the provision of the segregated cycle track will result in an offset to the cycle track of 2.0m from the property boundary. As noted in the scheme description, a footpath (2.0m in width) separates the property boundary from the proposed cycle track. The boundary wall at the front of the property will be at least 11.2m from the front of the house.

As noted in Chapter 4 Proposed Scheme Description of the EIAR, 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. The reinstatement of the boundary treatment will ensure a physical boundary is provided between the Proposed Scheme and the property, on a 'like for like' basis.

The aims and objectives of the Proposed Scheme are noted in section 1.2 of Chapter 1 Introduction of Volume 2 of the EIAR.

“The aim 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.”

While there will be an increase in bus numbers as part of the BusConnects Network redesign, it is important to acknowledge that as a result of the Proposed Scheme, there will be a positive significant reduction in general traffic volumes along the corridor. Section 6.4.6.3 Operational Phase Summary of Chapter 6 of the EIAR summarises:

“Overall, it has been determined that the impact of the reduction in general traffic flows along the Proposed Scheme will be Positive, Significant and Long-term whilst the impact of the redistributed general traffic along the surrounding road network will be Negative, Slight and Long-term. Thus, overall, there will be no significant deterioration in the general traffic environment in the study area as a consequence of meeting the scheme objectives of providing enhanced sustainable mode priority along the direct study area.”

The reduction in traffic volumes, combined with the significant improvements to pedestrian and cycle facilities as noted above, will not adversely affect the safety of the road environment.

In addition, an independent, Stage 1 Road Safety Audit was carried out on the Proposed Scheme and is included in Appendix M to the Preliminary Design Report. This audit did not envisage any safety issues with respect to the proximity of the Proposed Scheme to residential properties along the Navan Road.

3.2.5 CPO-05 – Geoff and Fiona Doherty (199 Navan Road)

3.2.5.1 Description of the Proposed Scheme at this location

In order to achieve the Proposed Scheme objectives along this section of the corridor on the R147 Navan Road, as described in section 4.5.4.1 of Chapter 4 of Volume 2 of the EIAR, the Proposed Scheme will generally consist of a bus lane and general traffic lane in each direction, with one-way cycle tracks alongside the proposed inbound and outbound bus lanes, each adjacent to a footpath. Permanent and temporary land take will be required from a number of properties in this area, with the majority being residential.

The existing road cross section in this location consists of a footpath and on-road cycle lane on the inbound side of the road and a footpath and on-road cycle lane on the outbound side, alongside a parking bay. One general traffic lane exists in each direction with an inbound bus lane provided. In-line bus stops are provided on the inbound and outbound carriageways to replace the existing bus stops at this location.

At this property the width of land to be temporarily acquired ranges between 4.2m and 4.5m. Permanent land take is not proposed at this property.

The relevant extract from the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description is shown in Figure 3.2.10, the existing aerial view in Figure 3.2.11, and existing street view in Figure 3.2.12.

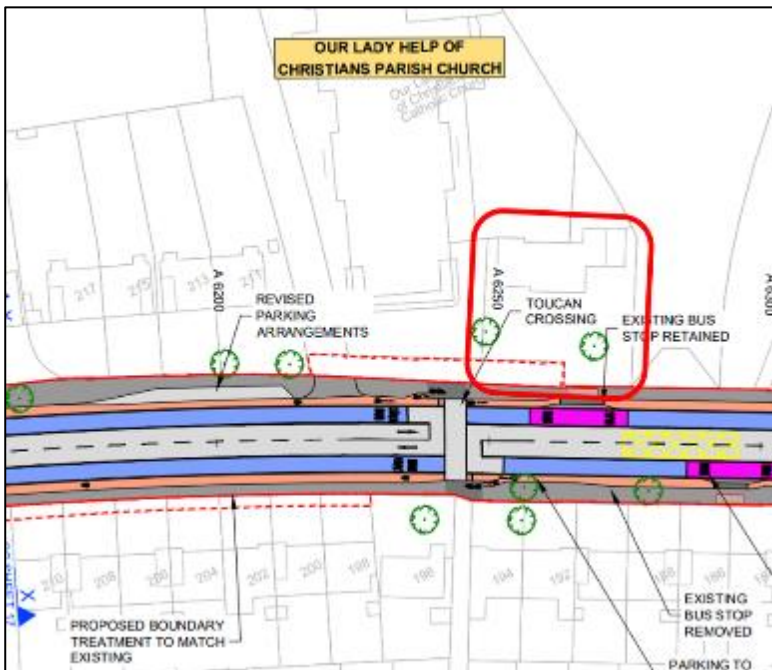


Figure 3.2.10: Proposed new Layout at 199 Navan Road



Figure 3.2.11: Existing aerial view at 199 Navan Road (Image Source: Google)



Figure 3.2.12: Existing Street View at 199 Navan Road (Image Source: Google)

3.2.5.2 Summary of Observations Raised

The submission received from property consultants Corr, acting on behalf of Geoff and Fiona Doherty of 199 Navan Road, objected to the Proposed Scheme and raised the following issues:

1. Temporary CPO

The submission stated that the temporary acquisition of land is not required for the scheme.

2. Drainage

The submission raised concerns about potential issues in relation to drainage from the Proposed Scheme.

3. Noise and vibration

4. Driveway access and parking

The submission noted that there is a lack of clarity around how continuous access will be provided during the construction phase and operational phase.

5. Footpath and cycle track arrangements

The submission noted that there is a lack of clarity around how footpath and cycle tracks will be organised relative to the new bus corridor.

3.2.5.3 Response to Observations Raised

A detailed response to the issues raised in point 3 of this submission are provided in section 2.2.3 of this report.

1. Temporary CPO

At 199 Navan Road, temporary land acquisition of approximately 4.5m in width is proposed. As noted in section 4.5.4.10 of Chapter 4 Proposed Scheme Description of Volume 2 of the EIAR, the temporary land acquisition is required from properties along the Navan Road to facilitate the construction of the replacement boundary and/or regrading of the driveway/access.

“This section of the Proposed Scheme progresses through an established residential area with education, retail, employment and community uses along the Navan Road. In this area, permanent land take is required from properties to accommodate widening required for the Proposed Scheme, resulting in the need to relocate boundary walls and gates at these properties. In this section temporary land take will be needed at these properties to construct new boundaries walls. Temporary land take is also required from properties to allow driveways and accesses to be regraded.”

For the property at 199 Navan Road, it is envisaged that local regrading works to the driveway/access area will be required to facilitate tie-in of the existing driveway area with the Proposed Scheme.

2. Drainage

It is assumed that the issue raised refers specifically to surface runoff and road drainage along the Core Bus Corridor in the area surrounding the property of 199 Navan Road.

Chapter 4 Proposed Scheme Description of the EIAR and section 4.6.14 provides an outline of the drainage design for the Proposed Scheme. Specifically in relation to the proposed road drainage network for the scheme, section 4.6.14.4 outlines states:

“Whilst in some areas the Proposed Scheme will increase the impermeable areas, additional permeable areas are also provided by the softening of public realm along the routes. The drainage design aims to sustain flow levels within the existing pipe network after a rainfall event by controlling the discharge rate within each catchment. Flows will be controlled by the implementation of SuDS techniques, where practicable.

One of the principal objectives of the road drainage system is to minimise the impact of the runoff from the roadways on the surrounding environment via the position of: filter drains, swales, bio-retention areas, tree pits, silt traps and attenuation features if necessary. The welfare of pedestrians and cyclists is a high priority in the consideration of the drainage system design.”

The general principle of the proposed drainage for the scheme are included in the ‘BusConnects Core Bus Corridor Drainage Design Basis’ (NTA 2020) which is included as Appendix K of the Preliminary Design Report in the Supplementary Information. Section 1.2 states:

“Existing drainage gullies located in the bus lane or cycle track should be removed when necessary and reused where possible. Side-entry kerb drainage/side-entry gullies should be considered for all new kerblines that must accommodate rainwater run-off. Existing gully connections will be used where possible. The drainage design will ensure that additional ponding does not occur along the routes.”

The preliminary design indicates that the proposed finished road level will be similar to the existing level in the vicinity of 199 Navan Road. A kerb will be installed between the carriageway and the cycle track, and between the cycle track and the footpath; hence surface water from the carriageway and cycle track will be collected without impacting the property. The design and cross-fall of the proposed footpath will appropriately consider the existing scenario to ensure the implementation of a positive drainage design and prevent additional surface water runoff from entering the property, as far as is reasonably practicable.

4. Driveway access and parking

At 199 Navan Road, approximately 4.5m width of temporary CPO is proposed to facilitate tie-in of the existing driveway/access area of the private landing to the rear of the proposed footpath. The existing boundary, access pillars and private driveway area beyond the entrance pillars will remain unaffected by the Proposed Scheme.

The principle of how residents can access/egress their property is unchanged by the scheme proposals. The existing access/egress scenario is similar to the proposed with the requirement for a vehicle to be driven across a cycle lane/cycle track and footpath. A dedicated bus lane is introduced along the core bus corridor and the edge of carriageway is relocated further away from the property by the order of 1.1m. This will not hinder the ability to park in the driveway.

Regarding access to the property during the construction phase, as noted in section 5.5.3.2 Parking and Access of Chapter 5 Construction of Volume 2 of the EIAR:

“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.

Details regarding temporary access provisions will be discussed with residents and business owners 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.”

5. Footpath and cycle track arrangements

Chapter 4 Proposed Scheme Description of the EIAR outlines the design principles associated with the Core Bus Corridor. It has been designed following guidance relating to the design principles for urban streets, bus facilities, cycle facilities and public realm. Figure 3.2.13 shows the typical road layout proposed for the Core Bus Corridor.

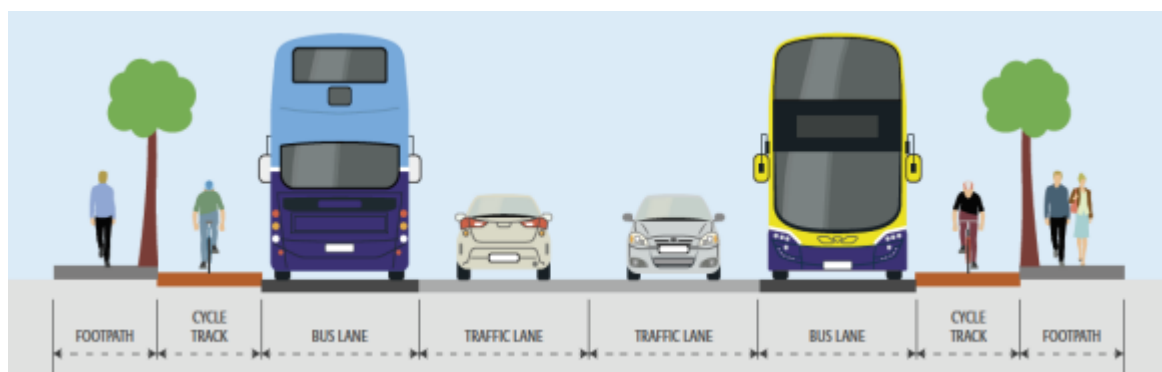


Figure 3.2.13: Typical BusConnects road layout

Bus Facilities

To satisfy one of the main objectives of the scheme, to enhance the capacity and potential of the public transport systems, bus priority is achieved through the provision of dedicated bus lanes, alongside general traffic, along the Navan Road and will be 3.0m in width as per traffic width lane guidance outlined in DMURS.

To improve the efficiency of the bus service along the Proposed Scheme the position and number of bus stops has been evaluated as part of a bus stop review, with the proposed layout of bus stops shown on the General Arrangement Drawings in Volume 3 of the EIAR. Bus stop layouts have been carefully considered and take cognisance of spatial requirements to provide the bus stop including shelter, waiting area, cycle lane and footpath provision and information displays. Subsequently the scheme adopts a hierarchy of bus stop design layouts to suit local constraints.

Cycling Provision

Section 4.6.3 of Chapter 4 of Volume 2 of the EIAR describes the preferred provision of dedicated cycle facilities along the route:

“The ‘preferred cross-section template’ developed for the Proposed Scheme includes protected cycle tracks, providing vertical segregation from the carriageway to the cycle track and vertical segregation from the cycle track to the footpath. “

Fully segregated cycle tracks (physically segregated from the adjacent traffic lane / bus lane horizontally and vertically) are provided along the Navan Road. The desirable minimum width for a single-direction cycle track is two metres. Figure 3.2.14 shows the typical arrangements of a fully segregated cycle track provided alongside the adjacent bus lane and footpath.

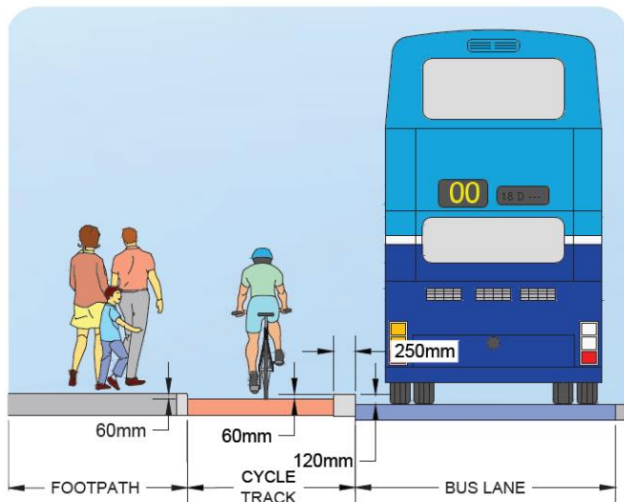


Figure 3.2.14: Fully segregated cycle track

Pedestrian provision

Enhancements for pedestrians are made through the provision of upgraded footpath facilities located adjacent to fully segregated cycle track along the Navan Road. The footpath is vertically segregated from the cycle track by a kerb with an upstand height of 60mm. As stated in section 4.6.1 of the EIAR:

“2.0m is the desirable minimum width for a footpath. This width should be increased in areas catering for significant pedestrian volumes where space permits. DMURS defines the absolute minimum footpath width for road sections as 1.8m based on the width required for two wheelchairs to pass each other.”

Junctions have been designed to facilitate a high level of safety, comfort, and priority for sustainable modes of travel (i.e. walking and cycling) and for public transport by prioritising the space and time allocated to these modes within the operation of a junction.

3.2.6 CPO-06 – Caitriona Sharkey and Ronan Doohan (383 Navan Road)

3.2.6.1 Description of the Proposed Scheme at this location

In order to achieve the Proposed Scheme objectives along this section of the corridor on the R147 Navan Road, as described in section 4.5.4.1 of Chapter 4 of Volume 2 of the EIAR, the Proposed Scheme will generally consist of a bus lane and general traffic lane in each direction, with one-way cycle tracks alongside the proposed inbound and outbound bus lanes. Permanent and temporary land take will be required from a number of properties, with the majority being residential.

The existing road cross section in this location consists of a footpath and grass verge on each side of the road with one general traffic lane and a bus lane in each direction.

At this property, the width of land to be temporarily acquired is approximately 15.0m in order to accommodate re-grading of the driveway to tie in with the proposed back of footpath. In order to achieve the desired design for the Proposed Scheme, temporary land acquisition is proposed from a number of properties in this area including 383 Navan Road.

The relevant extract from the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description is shown in Figure 3.2.15, the existing aerial view in Figure 3.2.16, and existing street view in Figure 3.2.17.

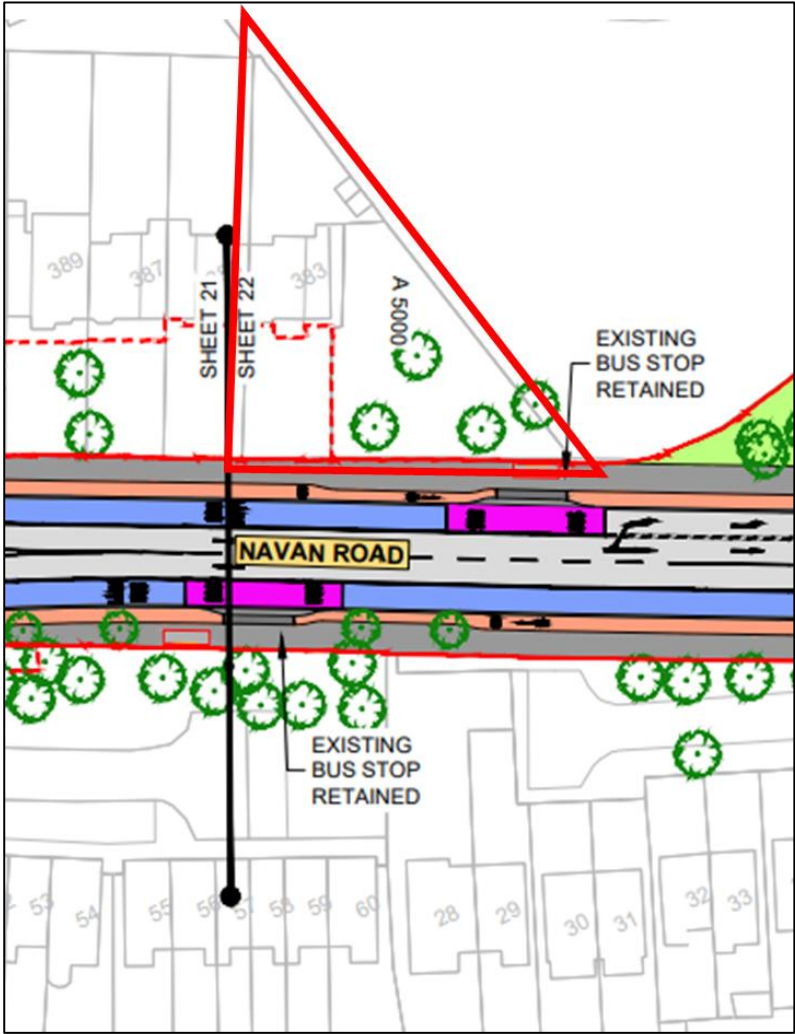


Figure 3.2.15: Proposed new Layout at 383 Navan Road

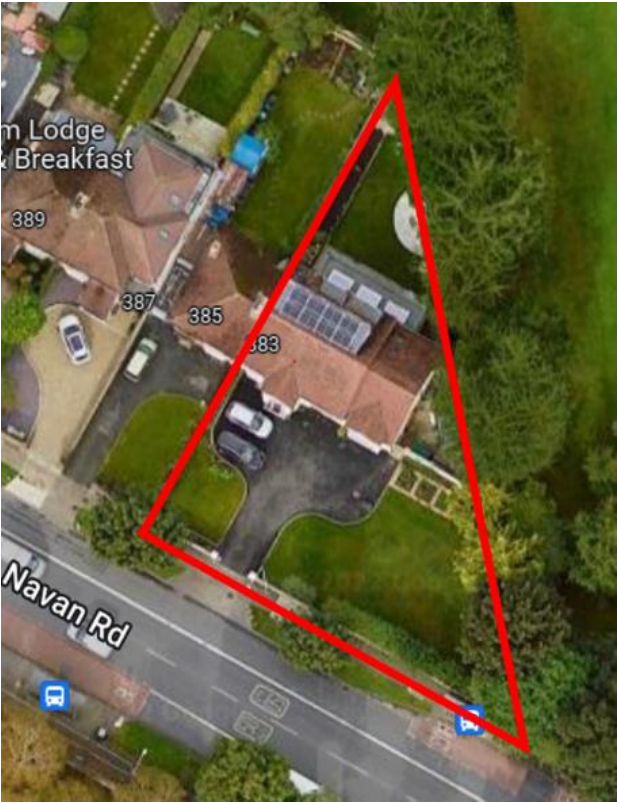


Figure 3.2.16: Existing aerial view at 383 Navan Road (Image Source: Google)



Figure 3.2.17: Existing Street View at 383 Navan Road (Image Source: Google)

3.2.6.2 Summary of Observations Raised

This objection raised eight potential issues as follows:

1. Purpose

The submission stated that they have not been informed on the intended purpose of temporary land acquisition of their driveway and garden.

2. Access

The submission questioned whether they would have access to their property at all times during road construction works, and stated that they require full access to the driveway to allow them to enter and exit their property in a safe manner.

3. Duration

The submission requested details of the proposed duration of the temporary land acquisition.

4. Impact on the front garden and driveway

The submission questioned the proposed impact on the appearance of the front lawn due to the CPO.

5. Security

The submission stated that they have installed electronic gates for security reasons which are required to be fully operational at all times. The submission has questioned what days and times access is required to the property.

6. Higher level of the road and flood risk

The submission stated that there is a drain between the main road and the front gate to capture excess flood waters. The submission has questioned what measures will be put in place to ensure excess flood waters will not flow into the driveway and what the proposed road levels are compared to existing road levels.

7. Front pier and electric gates

The submission stated that electric gates have been custom built for the entrance to the driveway. The submission questioned if there will be an impact on the pedestrian footpath and road level outside the property, and if so, what are the proposed levels and impact on the level of the driveway, front gate pillars and electric gates relative to existing levels, noting there are significant electrical services beneath the driveway surface.

8. Front boundary wall and hedging

The submission stated that the boundary wall and hedging provide a screen to the property from the footpath and roadway. The submission questioned if any proposed alterations will impact on the structural soundness of the boundary wall and hedging.

3.2.6.3 *Response to Observations Raised*

1. Purpose

The proposed temporary land acquisition will be approximately 15.0m from the boundary wall. As noted in section 5.3.4.1 of Chapter 5 Construction of Volume 2 of the EIAR, the driveway will be regraded in order to tie in with the back of the proposed footpath where levels are changing compared to the existing situation.

As noted in section 5.5.2.1 Land Acquisition and Boundary Treatment of Chapter 5 Construction of Volume 2 of the EIAR, *“land temporarily acquired from a landowner will only be utilised for the purposes of undertaking boundary works or accommodation works related to the land in question.”*

2. Access

As noted in section 5.5.3.2 Parking and Access of Chapter 5 Construction of Volume 2 of the EIAR:

“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. Details regarding temporary access provisions will be discussed with residents and business owners 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.

3. Duration

Section 5.3.4.1 of Chapter 5 of Volume 2 of the EIAR provides details of the construction activities along Navan Road, between Ashtown Road Roundabout and Baggot Road, Kinvara Avenue Junction. The expected construction duration for the section will be approximately 12 months. In relation to this property, the construction duration has yet to be determined and is dependent on the extent of the works required in consultation with the property owner/occupier. It will only be required for the duration of the works to the property.

4. Impact on the front garden and driveway

As noted in section 4.6.11.5.3 of Chapter 4 Proposed Scheme Description of Volume 2 of the EIAR, property boundaries, where impacted, *“will be reinstated on a ‘like for like’ basis, including any walls, piers, fences, railings, gates, driveway finishes and private landscaping.”*

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.

5. Security

As noted in response to item ii. above, details regarding temporary access provisions will be discussed with residents and business owners prior to construction starting in the area. The days and times are yet to be determined and is dependent on the extent of the works required in consultation with the property owner/occupier.

6. Higher level of the road and flood risk

The preliminary design indicates that the proposed finished road level will be similar to the existing level in the vicinity of 383 Navan Road.

A kerb will be installed between the carriageway and the cycle track and between the cycle track and the footpath; hence rainwater from the carriageway and cycle track will be collected without impacting the driveway.

It is proposed to cross-fall the footpath towards the driveway in this area, and thus drainage collection will be installed to drain the proposed approximate 2.8m wide footpath to prevent rainwater from entering the driveway.

This will be an improvement on the existing situation which currently has a fall in the carriageway and 4m wide footpath towards the driveway.

7. Front pier and electric gates

In order to facilitate the proposed cross-section at 383 Navan Road, it will be necessary to raise the footpath level by approximately 200 mm where it ties in with the driveway. Consequently, the electric gates and associated services for the gates will be adjusted as part of the accommodation works. The impact on the gate pillars will also be assessed and pillars adjusted in height if required. The driveway will be regraded to facilitate a rise in footpath level. The extent of driveway to be regraded and works to pillars and gates will be agreed with the landowner as part of detailed accommodation works plans to 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.

8. Front boundary wall and hedging

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. As noted above, 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.

It is noted though that the existing front boundary walls exhibit cracking and the proposed works will not result in a deterioration in cracking.

3.2.7 CPO-07 – Sharon and Sean Downes (114 Navan Road)

3.2.7.1 *Description of the Proposed Scheme at this location*

In order to achieve the Proposed Scheme objectives along this section of the corridor on the R147 Navan Road, as described in section 4.5.4.1 of Chapter 4 of Volume 2 of the EIAR, the Proposed Scheme will generally consist of a bus lane and general traffic lane in each direction, with one-way cycle tracks alongside the proposed inbound and outbound bus lanes, each adjacent to a footpath. Permanent and temporary land take will be required from a number of properties in this area, with the majority being residential.

The existing road cross section in this location consists of a footpath on the inbound side of the road and a footpath and on-road cycle lane on the outbound side. One general traffic lane exists in each direction with an inbound bus lane provided. Existing mature trees are located within the footpath along the Navan Road on both sides.

At this property the width of land to be temporarily acquired is approximately 6.0m. Permanent land take is not proposed at this property.

The relevant extract from the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description is shown in Figure 3.2.18, the existing aerial view in Figure 3.2.19, and existing street view in Figure 3.2.20.

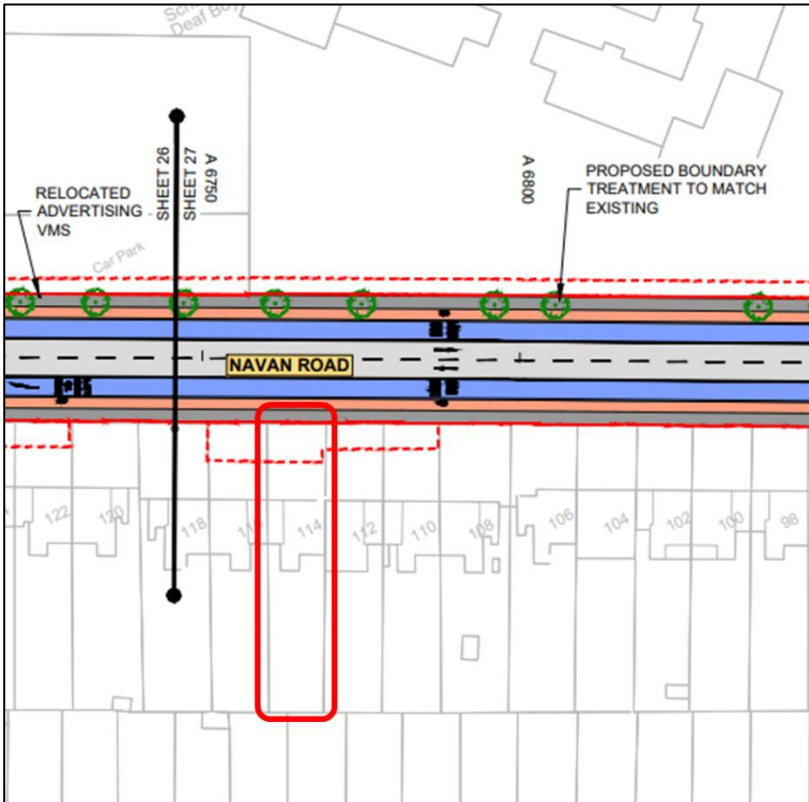


Figure 3.2.18: Proposed new Layout at 114 Navan Road



Figure 3.2.19: Existing aerial view at 114 Navan Road (Image Source: Google)



Figure 3.2.20: Existing Street View at 114 Navan Road (Image Source: Google)

3.2.7.2 Summary of Observations Raised

The submission raised an objection to the CPO and stated that any correspondence to date from the NTA had not made it clear why temporary land acquisition is required and they had not received any clarification to queries previously raised.

The submission raised the following issues:

1. Lack of information and details
2. Safety

The submission raised concerns over safety risks posed to children during construction phase of the Proposed Scheme.

3. Extent of temporary CPO

The submission stated that the extent of temporary CPO is significantly greater than adjacent properties.

3.2.7.3 Response to Observations Raised

1. Lack of information and details

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 10 activities under the sub-heading of Site Preparation and Clearance Works, and 10 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 19 different elements of the works, see Table 3.2.1 below.

Table 3.2.1: Extract from EIAR Volume 3; Table of Contents

Figure Number	Title
Chapter 4: Proposed Scheme Description	
BCIDC-ARP-SPW_ZZ-0005_XX_00-DR-CR-9001	Site Map and Site Location Plan
BCIDC-ARP-GEO_GA-0005_XX_00-DR-CR-9001	General Arrangement
BCIDC-ARP-GEO_HV-0005_XX_00-DR-CR-9001	Mainline Plan and Profile
BCIDC-ARP-GEO_CS-0005_XX_00-DR-CR-9001	Typical Cross Sections
BCIDC-ARP-ENV_LA-0005_XX_00-DR-LL-9001	Landscaping General Arrangement
BCIDC-ARP-PAV_PV-0005_XX_00-DR-CR-9001	Pavement Treatment Plans
BCIDC-ARP-SPW_BW-0005_XX_00-DR-CR-9001	Fencing and Boundary Treatment
BCIDC-ARP-TSM_GA-0005_XX_00-DR-CR-9001	Traffic Signs and Road Markings
BCIDC-ARP-LHT_RL-0005_XX_00-DR-EO-9001	Street Lighting
BCIDC-ARP-TSM_SJ-0005_XX_00-DR-TR-9001	Junction Systems Design
BCIDC-ARP-DNG_RD-0005_XX_00-DR-CD-9001	Proposed Surface Water Drainage Works
BCIDC-ARP-UTL_UD-0005_XX_00-DR-CU-9001	IW Foul Sewer Asset Alterations
BCIDC-ARP-UTL_UE-0005_XX_00-DR-CU-9001	ESB Asset Alterations
BCIDC-ARP-UTL_UG-0005_XX_00-DR-CU-9001	GNI Asset Alterations
BCIDC-ARP-UTL_UW-0005_XX_00-DR-CU-9001	IW Water Asset Alterations
BCIDC-ARP-UTL_UL-0005_XX_00-DR-CR-9001	Telecommunications Asset Alterations
BCIDC-ARP-UTL_UC-0005_XX_00-DR-CU-9001	Combined Existing Utilities Records
BCIDC-ARP-STR_GA-0005_XX_00-DR-CB-9001	Bridges and Major Retaining Structures
BCIDC-ARP-BLD_IX-0005_XX_00-DR-AA-9001	Building Architecture

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

Reference should also be made to response to point 3. below which provides specific information pertaining to the need for the temporary land acquisition.

2. Safety

Chapter 5 Construction of the EIAR describes details of the construction activities associated with the Proposed Scheme. Section 5.1 affirms that a competent contractor will be appointed to carry out the scheme works, including the implementation of effective mitigation measures as identified by the EIAR.

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.

Chapter 5 of the EIAR sets out details of the Construction Phase of the Proposed Scheme and describes the construction phasing and programme to include the construction activities necessary to undertake the works.

With respect to the construction works to be undertaken in the vicinity of 114 Navan Road, section 5.3.4.3 provides an overview.

"Section 4b encompasses a length of approximately 1,050m along Navan Road, between Baggot Road, Kinvara Avenue Junction and Skreen Road Junction. The construction activities at Section 4b will comprise widening, reconstruction, and resurfacing of the roads, footpaths, and cycle tracks, and new kerbs. Construction activities will also consist of new road markings, new and amended traffic signal infrastructure, new street furniture and landscaping works. A miscellaneous retaining wall (RW21) approximately 35m in length and maximum 0.5m in retained height will be constructed along the northern side of Navan Road. Boundary walls and associated gates to properties and premises will be relocated at a number of locations along both sides of Navan Road. Some of these walls are likely to incorporate retention of private gardens / frontages. A number of driveways will also be regraded. Digipoles / digipanel located along Navan Road will be relocated.

Further information on the digipole / digipanel relocation methodology is provided in section 5.5.4.2.4. Some minor utility diversions and / or protections will be required. Trees will be removed at multiple locations. The expected construction duration will be approximately ten months."

As described in paragraph 5.5.3.2 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."*

Section 5.10.5 of the EIAR furthermore confirms that the relevant health, safety and welfare regulations will be complied with at all times ensuring the works are planned, managed and safely executed as such:

"The requirements of Number 10 of 2005 – Safety, Health and Welfare at Work Act 2005, S.I. No. 291/2013 Safety, Health and Welfare at Work (Construction) Regulations, 2013 (hereafter referred to as the Regulations) and other relevant Irish and European Union safety legislation will be complied with at all times. As required by the Regulations, a Health and Safety Plan will be formulated which will address health and safety issues from the design stages through to the completion of the Construction Phase."

3. Extent of temporary CPO

At 114 Navan Road, temporary land acquisition of approximately 6.0m width is proposed. As noted in section 4.5.4.10 of Chapter 4 Proposed Scheme Description, the temporary land acquisition is required for properties along the Navan Road to facilitate the Proposed Scheme.

This section of the Proposed Scheme progresses through an established residential area with education, retail, employment and community uses along the Navan Road. In this area, permanent land take is required from properties to accommodate widening required for the Proposed Scheme, resulting in the need to relocate boundary walls and gates at these properties.

In this section temporary land take will be needed at these properties to construct new boundaries walls. Temporary land take is also required from properties to allow driveways and accesses to be regraded.

For the property at 114 Navan Road, it is envisaged that local regrading works to the driveway/access area will be required to facilitate tie-in of the existing driveway area with the Proposed Scheme.

3.2.8 CPO-08 – Eamon Doyle (305 Navan Road)

3.2.8.1 Description of the Proposed Scheme at this location

In order to achieve the Proposed Scheme objectives along this section of the corridor on the R147 Navan Road, as described in section 4.5.4.1 of Chapter 4 of Volume 2 of the EIAR, the Proposed Scheme will generally consist of a bus lane and general traffic lane in each direction, with one-way cycle tracks alongside the proposed inbound and outbound bus lanes, each adjacent to a footpath. Permanent and temporary land take will be required from a number of properties in this area, with the majority being residential.

The existing road cross section in this location consists of a footpath, grass verge and on-road cycle lane on the inbound side of the road and a footpath and on-road cycle lane on the outbound side with one general traffic lane in each direction and a bus lane in the inbound direction.

At this property the width of land to be permanently acquired ranges between 1.3m and 1.6m. This will require the relocation of the existing boundary wall and any adjacent vegetation.

The relevant extract from the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description is shown in Figure 3.2.21, the existing aerial view in Figure 3.2.22, and existing street view in Figure 3.2.23.

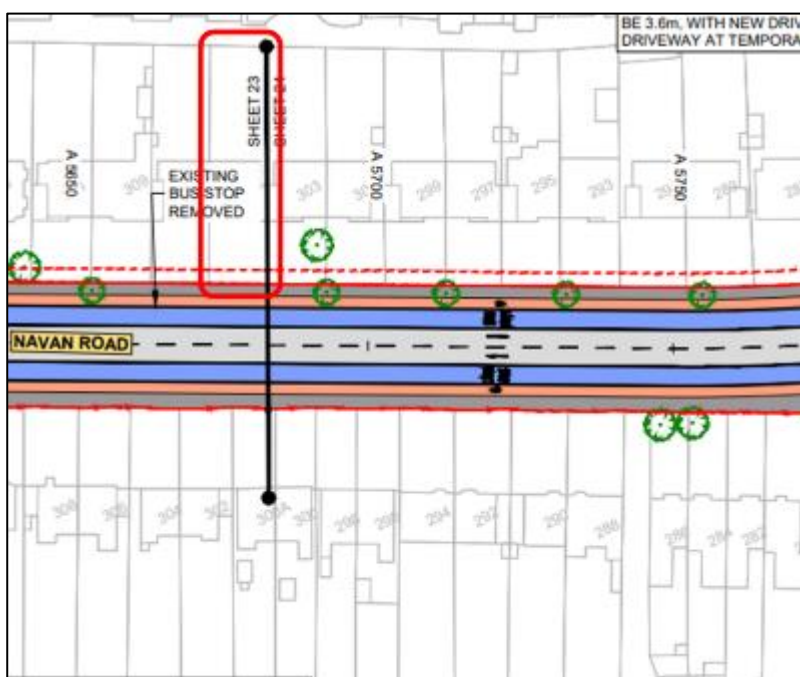


Figure 3.2.21: Proposed new Layout at 305 Navan Road



Figure 3.2.22: Existing aerial view at 305 Navan Road (Image Source: Google)



Figure 3.2.23: Existing Street View at 305 Navan Road (Image Source: Google)

3.2.8.2 Summary of Observations Raised

The submission raised an objection and requested an oral hearing. The submission also raised the following observations:

1. Consultation process
2. Noise and vibration
3. Impact on property value
4. Driveway access and egress

The submission stated that the reduction in driveway space will result in difficulty manoeuvring within the driveway and furthermore entering and exiting the property.

5. Bus stops
6. Removal and provision of trees
7. Bus journey time and reliability

8. Alternative route options
9. Old Cabra Road Bus Gate

3.2.8.3 *Response to Observations Raised*

Detailed responses to the issues raised in points 1 to 3 and 5 to 9 this submission are provided in sections 2.2.3, 2.3.3 and 2.10.2 of this report.

4. Driveway access and egress

The permanent acquisition will result in the loss of approximately 1.6m with an additional 2.5m temporarily required to allow for the construction of boundary treatment works and tying into the existing garden/driveway. The edge of the proposed bus lane will be 0.6m closer to the residence than the kerb of the existing general traffic lane. The 9.6m long front boundary wall, including gate and entrance pillars will be at least 10.2m from the front of the house. It is believed that this would not introduce any additional risk to the owners during the operation of the proposed scheme and that this should not hinder the availability of parking in the driveway.

The principle of how residents can access/egress their property is unchanged by the scheme proposals. The proposed access/egress scenario is similar to the existing with the requirement for a vehicle to be driven across a cycle lane/cycle track and footpath.

In accordance with Statutory Instrument S.I. No. 182/1997 - Road Traffic (Traffic and Parking) Regulations, 1997 Section 13 Driving on Footway and Section 14 Cycle Tracks, a vehicle is allowed to be driven across the footpath and/or Cycle Track for the purpose of access to or egress from an adjacent place. Furthermore, in accordance with S.I. No. 182/1997 Section 12 (3) reversing onto a public road from a place adjacent is not prohibited; "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."

In addition, as noted in Appendix M2 Stage 1 Road Safety Audit of the Preliminary Design Report:

"The scheme has been examined and this report compiled in respect of the consideration of those matters that have an adverse effect on road safety and considers the perspective of all road users."

All recommended measures or alternative measures proposed by the Designer were accepted by the Road Safety Audit Team.

3.2.9 CPO-09 – Colm Duffy (3 Herbert Road)

3.2.9.1 *Description of the Proposed Scheme at this location*

In order to achieve the Proposed Scheme objectives along this section of the corridor on the N3 Navan Road, as described in section 4.5.2.1 of Chapter 4 of Volume 2 of the EIAR, a bus lane will be provided along the N3 Snugborough Road junction on-slip and off-slip ramps. The Proposed Scheme will provide bus lanes on the N3 corridor in both directions which will require the widening of the BR01 River Tolka Bridge beneath the N3 off-slip and also BR02 Mill Road Bridge.

Inbound and outbound bus stops will be provided on the N3 with pedestrian access (via pedestrian ramps and steps) to and from Mill Road. Existing noise barriers will be relocated along the outbound carriageway at the back of the verge.

The existing dual carriageway cross section in this location consists of three lanes of general traffic in both directions.

At this property the width of land to be permanently acquired ranges between 2.6m and 5.6m. This will require the relocation of the existing noise barrier and replacement landscaping.

The relevant extract from the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description is shown in Figure 3.2.24, the existing aerial view in Figure 3.2.25, and existing street view in Figure 3.2.26.

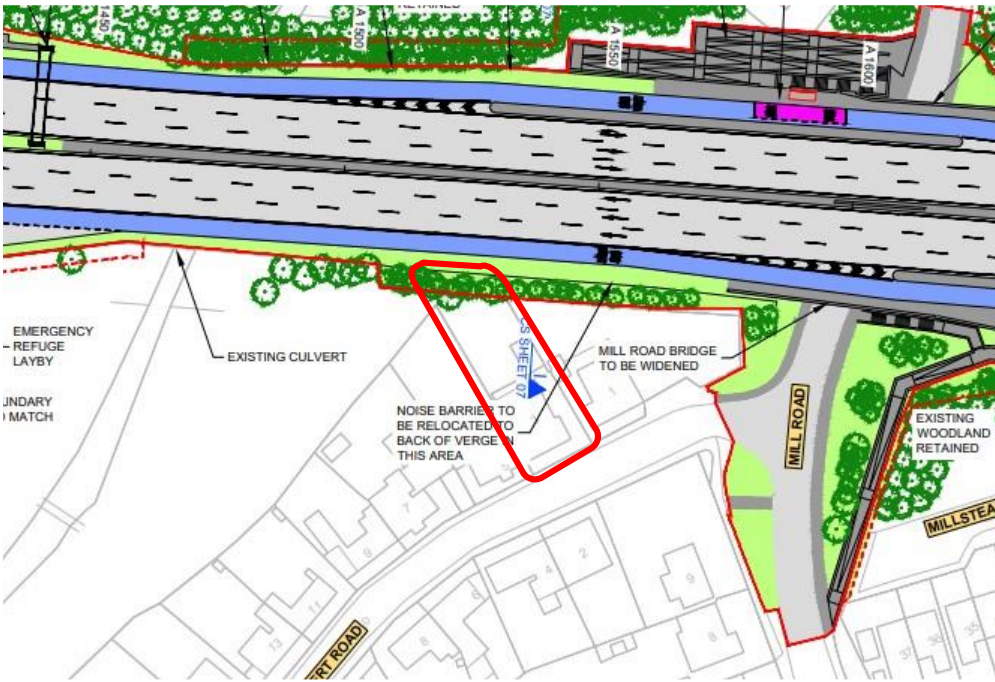


Figure 3.2.24: Proposed new Layout at 3 Herbert Road



Figure 3.2.25: Existing aerial view at 3 Herbert Road (Image Source: Google)

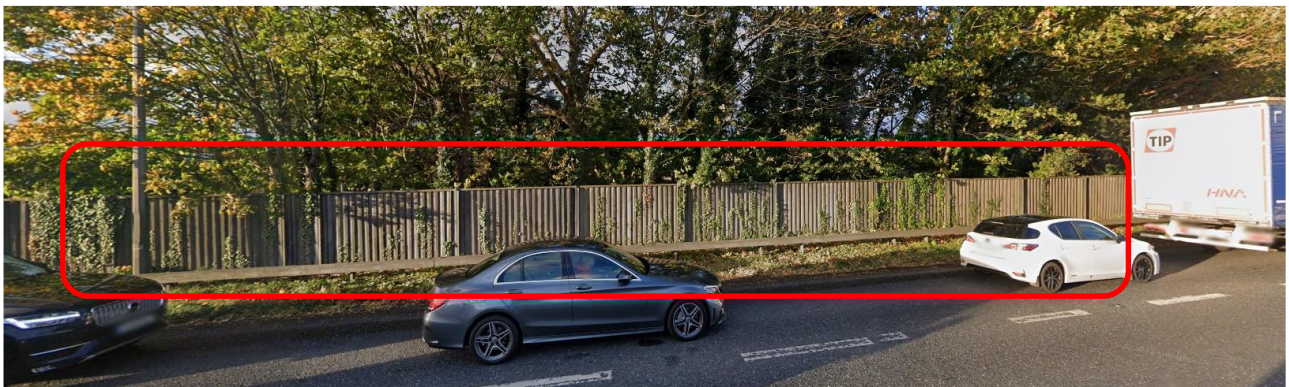


Figure 3.2.26: Existing Street View at 3 Herbert Road (Image Source: Google)

3.2.9.2 Summary of Observations Raised

This objection raised a number of issues as follows:

1. Disruption to property

The submission raised concerns over disruption to the property both during and after construction.

2. Impacts on noise

The submission raised concerns about noise resulting from removal of established trees of the Proposed Scheme.

3. Safety

The submission raised concerns that the height and proximity of the bus corridor represents a safety risk to occupants in the garden area.

4. Out-of-date mapping

The submission stated that the maps supporting the planning application are out of date.

3.2.9.3 Response to Observations Raised

1. Disruption to property

As noted in the CPO schedule (Part I), the lands to be permanently acquired are limited to the embankment area to the rear of 1 & 3 Herbert Road. The permanent land take at this location will facilitate construction of the Proposed Scheme to include verge regrading works, relocation of the existing noise barrier to the back of verge and landscaping works.

There are no proposals to impact on the existing garden space of the property at 3 Herbert Road.

2. Impacts on noise

The permanent acquisition of land of between 2.6m and 5.6m is to allow for the construction of the Proposed Scheme cross-section at this location, which will require the removal of landscaping in this area. As noted in Chapter 17 Landscape and Visual of the EIAR, there will be no unnecessary loss of trees and replacement planting will be undertaken where practicable. The existing noise barrier will be re-erected along the proposed back of verge to the Proposed Scheme.

As outlined in section 5.5.4.2.3 'Noise Barriers' of Chapter 5 of the EIAR, existing noise barriers, currently located along the N3 dual carriageway, northbound, adjacent to Old River Road and Herbert Road will be relocated to facilitate the provision of the Proposed Scheme. These barriers will be relocated to the back of the proposed verge. The noise barriers existing length, height and coverage will be maintained to provide the same protection to receptors.

In relation to the impact of the Proposed Scheme on traffic noise in the vicinity of 3 Herbert Road as shown on Figures 9.4 and 9.5 of Chapter 9 Noise and Vibration of Volume 3 of the EIAR, this has been assessed as Imperceptible / Positive for opening year 2028 and Not Significant / Slight for the design year 2043.

Furthermore, as noted in section 9.5.2 'Operational Phase' of Chapter 9:

“the range of noise level changes and overall noise levels calculated do not require any specific noise mitigation measures to be incorporated into the Proposed Scheme.”

3. Safety

The preliminary design indicates that the proposed finished road level will be similar to the existing level along the N3 Dual Carriageway in the vicinity of 3 Herbert Road. Over the length of the land take area, the edge of the proposed bus lane along the N3 Dual Carriageway will be between 0.3m and 1.2m further away from the residence than the edge of the existing general traffic lane.

The permanent acquisition will result in the loss of 2.6m and 5.6m to the embankment area to the rear of the garden, there are no proposals to impact on the garden area itself.

The permanent land acquisition is required to regrade the existing verge levels and will require relocation of the existing noise barrier and vehicle restraint system to an appropriate setback from the carriageway. It is believed that the proposals would not introduce any additional risk to the owners during the operation of the proposed scheme.

In addition, a road safety audit has been undertaken on this preliminary design for the Proposed Scheme with any recommended measures implemented.

4. Out-of-date mapping

The preliminary design of the Proposed Scheme was developed using the topographical survey, obtained in 2019, for the extent of the Core Bus Corridor. Furthermore, the Proposed Scheme layout, the topographical survey and land folio boundary information has been used to define the extents of CPO along the scheme.

Ordnance Survey background mapping, obtained prior to 2019, is shown on the layout drawings provided in Volume 3 of the EIAR in order to provide a visual context to the scheme proposals.

3.2.10 CPO-10 – Patrick and Elizabeth Farrell (287 Navan Road)

3.2.10.1 Description of the Proposed Scheme at this location

In order to achieve the Proposed Scheme objectives along this section of the corridor on the R147 Navan Road, as described in section 4.5.4.1 of Chapter 4 of Volume 2 of the EIAR, the Proposed Scheme will generally consist of a bus lane and general traffic lane in each direction, with one-way cycle tracks alongside the proposed inbound and outbound bus lanes, each adjacent to a footpath. Permanent and temporary land take will be required from a number of properties, with the majority being residential.

The existing road cross section in this location consists of a footpath, grass verge and on-road cycle lane on the inbound side of the road and a footpath and on-road cycle lane on the outbound side with one general traffic lane in each direction and a bus lane in the inbound direction.

At this property the width of land to be permanently acquired ranges between 1.9m and 2.2m. This will require the relocation of the existing boundary wall and adjacent vegetation.

The relevant extract from the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description is shown in Figure 3.2.27, the existing aerial view in Figure 3.2.28, and existing street view in Figure 3.2.29.

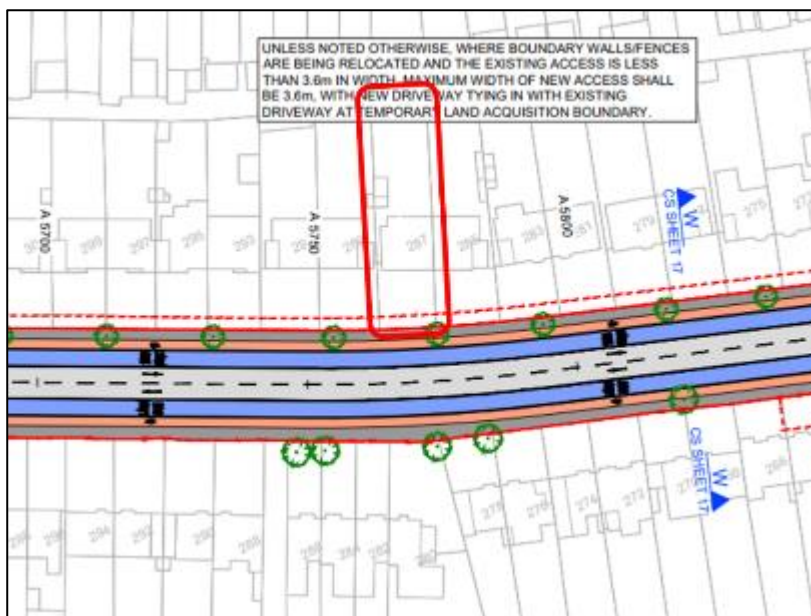


Figure 3.2.27: Proposed new Layout at 287 Navan Road



Figure 3.2.28: Existing aerial view at 287 Navan Road (Image Source: Google)



Figure 3.2.29: Existing Street View at 287 Navan Road (Image Source: Google)

3.2.10.2 *Summary of Observations Raised*

This objection raised four potential issues as follows:

1. Providing for mobility impaired users
2. Impact on noise and light pollution

The submission stated that the removal of the hedgerow/trees from the property's garden will remove highly effective noise and light attenuation from the road.

3. Widening Navan Road will not achieve the scheme objectives

The submission stated that widening the Navan Road will not achieve scheme objectives of reducing journey times as it does not address traffic pinch points closer to the city. It also stated that the scheme fails to recognise that increasing road space will lead to an increase in private traffic rather than an increase in public transport, leading to further congestion.

4. Alternative measures

5. Alternative Route Options

3.2.10.3 Response to Observations Raised

Detailed responses to the issues raised in point 1, 4 and 5 of this submission are provided in section 2.10.2 and 2.3.3 of this report.

2. Impact on noise and light pollution

The permanent acquisition of land of between 1.9m and 2.2m is to allow for the construction of the Proposed Scheme cross-section at this location, which will require the removal of existing planting along the inside of the existing boundary wall.

Section 4.6.11 of the EIAR Chapter 4 Proposed Scheme Description discusses landscape and urban realm along the Proposed Scheme. As stated in section 4.6.11.5.3:

“in general, property boundaries will be reinstated on a ‘like for like’ basis, including any walls, piers, fences, railings, gates, driveway finishes and private landscaping.”

Where private grounds are reduced by permanent land take required for the scheme, the remaining grounds will be reinstated to match the landscape and character of the existing grounds in consultation with the property owner. Therefore, it is expected that the change in exposure to light or noise at the property will be negligible.

In relation to the impact of the Proposed Scheme on traffic noise in the vicinity of 287 Navan Road as shown on Sheet 3 of Figures 9.4 and 9.5 of Chapter 9 Noise and Vibration of Volume 3 of the EIAR, this has been assessed as Imperceptible / Positive for years 2028 and 2043.

Furthermore, a detailed response to the issue raised regarding noise in point 2. of this submission has been provided in section 2.2.3 of this report.

3. Widening Navan Road will not achieve the scheme objectives

As stated in Chapter 1 Introduction of the EIAR one of the scheme objectives is 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. In order to achieve the Proposed Scheme objectives along this section of the corridor on the R147 Navan Road, as described in paragraph 4.5.4.1 of Chapter 4 of Volume 2 of the EIAR, the Proposed Scheme will generally consist of a bus lane and general traffic lane in each direction, with one-way cycle tracks alongside the proposed inbound and outbound bus lanes.

As noted in section 4.5.5.1 of Chapter 4 of Volume 2 of the EIAR, bus priority closer to the city centre will be provided by some of the following proposals:

“The Proposed Scheme will limit the use of Old Cabra Road to local access traffic, buses, taxis and cyclists. “

“To provide an alternative route for general traffic to and from the City Centre (along Cabra Road, North Circular Road, Infirmary Road and Conyngham Road), the Cabra Road (Dalymount) / North Circular Road junction will be modified to allow right turns from Cabra Road (Dalymount) to North Circular Road and left turns from North Circular Road onto Cabra Road (Dalymount).”

“The junction of Prussia Street and North Circular Road will be upgraded to a signalised junction to provide separate crossing facilities for cyclists and pedestrians, and to ban right turns from Prussia Street to minimise delay to buses travelling straight ahead (to Old Cabra Road).

Along Prussia Street, a traffic lane will be provided in both directions, carrying buses and local traffic only.”

“At the junction of Manor Street / Prussia Street with Aughrim Street, the Proposed Scheme will provide the following:

- In the northbound direction, a Bus Gate will be located on Prussia Street just north of Aughrim Street junction, such that all northbound general traffic will be required to turn left onto Aughrim Street;*
- In the southbound direction, a Bus Gate will be located on Prussia Street / Manor Street just south of the Aughrim Street junction – and any general traffic travelling southbound on Prussia Street at this location will be required to turn right onto Aughrim Street.”*

“The Proposed Scheme will include signal-controlled priority for northbound buses at the Stoneybatter / Brunswick Street North junction.”

“A southbound general traffic lane will be provided along Stoneybatter between Brunswick Street North and King Street North, with general traffic being required to turn left into King Street North as a result of a southbound Bus Gate at Blackhall Place / King Street North junction. Bus services will continue travelling straight ahead along a southbound bus lane on Blackhall Place. This matches the current situation.”

As noted in section 2.4 The Benefits of the Proposed Scheme of Chapter 2 of Volume 2 of the EIAR:

“The Proposed Scheme has been designed to facilitate improved efficiency of the transport network through the improvement of the infrastructure for active (walking and cycling) and public transport modes making them attractive alternatives to car-based journeys. Central to the design is the optimization of roadway space with a focus on the movement of people rather than vehicles along the route and through the junctions. A typical double-deck bus takes up the same road space as three standard cars but typically carries 50-100 times the number of passengers. On average, a typical double-deck bus carries approximately 60-70 passengers making the bus typically 20 times more efficient in providing people movement capacity within the equivalent spatial area of three cars. These efficiency gains can provide a significant reduction in road network congestion where the equivalent car capacity would require 50 or more vehicles based on average occupancy levels. Consequently, by prioritising the movement of bus over cars, significantly more people can be transported along the limited road space available. Similarly, cyclists and pedestrians require significantly less roadway space than general traffic users to move safely and efficiently along the route. Making space for improved pedestrian and cycle infrastructure can significantly benefit these sustainable modes and encourage greater use of these modes.

The Proposed Scheme design involves the prioritisation of People Movement, focusing on maximising the throughput of sustainable modes (i.e. Walking, Cycling and Bus modes). A quantitative people-movement assessment, as part of the transport impact assessment, facilitates a comparison of the Do Minimum and Do Something peak-hour scenarios for the forecast years (2028 and 2043). The benefits resulting from the 2028 AM Peak Hour people-movement assessment shows that there is an increase of 76% in the number of people travelling by bus, an increase of 53% in people walking or cycling, and a reduction of 14% in the number of people travelling by car along the Proposed Scheme.”

“The Proposed Scheme will address sustainable mode transport infrastructure constraints while contributing to an overall integrated sustainable transport system as proposed in the GDA Transport Strategy. It will increase the effectiveness and attractiveness of bus services operating along the corridor and will result in more people benefiting from faster journey times and improved journey time reliability.

This in turn will facilitate the increase in the bus network capacity of services operating along the corridor and thereby further increase the attractiveness of public transport. In addition, the significant segregation and safety improvements to walking and cycling infrastructure that are a key feature of the Proposed Scheme will further maximise the movement of people travelling sustainably along the corridor and will therefore cater for higher levels of future sustainable population and employment growth. In the absence of the delivery of the Proposed Scheme, growth along this key corridor would continue to contribute to increased traffic congestion and operational issues on the road network.

The Proposed Scheme delivers a reliable alternative to car-based travel that can support future sustainable growth and contribute positively towards reducing carbon emissions.”

3.2.11 CPO-11 – Paddy Faughnan (200 Navan Road)

3.2.11.1 Description of the Proposed Scheme at this location

In order to achieve the Proposed Scheme objectives along this section of the corridor on the R147 Navan Road, as described in section 4.5.4.1 of Chapter 4 of Volume 2 of the EIAR, the Proposed Scheme will generally consist of a bus lane and general traffic lane in each direction, with one-way cycle tracks alongside the proposed inbound and outbound bus lanes, each adjacent to a footpath. An existing parking layby is retained on the inbound carriageway. Permanent and temporary land take will be required from a number of properties, with the majority being residential.

The existing road cross section in this location consists of a footpath and on-road cycle lane on the inbound side of the road alongside a parking bay close to St. John Bosco National School, and a footpath and on-road cycle lane on the outbound side. The existing outbound carriageway is lined by a row of mature trees spaced along the route. One general traffic lane exists in each direction with an inbound bus lane provided. In-line bus stops will be provided on the inbound and outbound carriageways to replace the existing bus stops at this location.

At this property the width of land to be permanently acquired ranges between 0.2m and 0.6m in width. This will require the relocation of the existing boundary wall and any adjacent vegetation.

The relevant extract from the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description is shown in Figure 3.2.30, the existing aerial view in Figure 3.2.31, and existing street view in Figure 3.2.32.

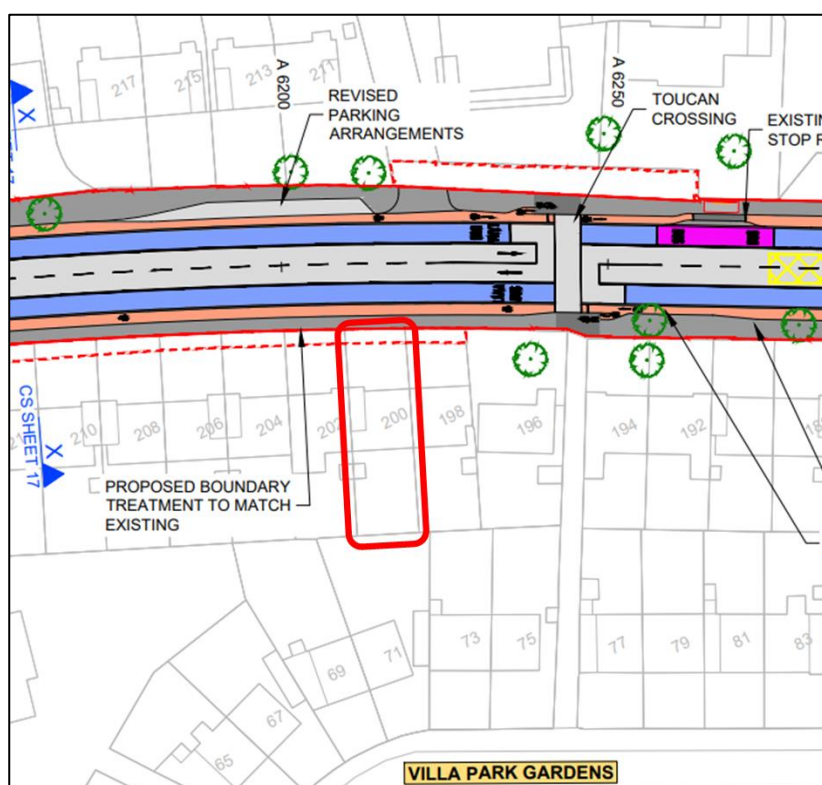


Figure 3.2.30: Proposed new Layout at 200 Navan Road



Figure 3.2.31: Existing aerial view at 200 Navan Road (Image Source: Google)



Figure 3.2.32: Existing Street View at 200 Navan Road (Image Source: Google)

3.2.11.2 Summary of Observations Raised

This objection raised the following issues:

1. Consultation Process
2. Removal of Ashtown Roundabout
3. Increase in traffic flows and associated safety and journey time impacts
4. Impact on Prussia Street, Manor Street and Stoneybatter

5. Removal and provision of trees

6. Realignment of carriageway

The submission suggested that proposed road widening take place to the northern part of the carriageway as the existing footpath is much wider on the northern side, which would then negate the need for permanent land acquisition from 200 Navan Road and adjacent properties.

7. Impact on property values

8. Bus stops

3.2.11.3 Response to Observations Raised

Detailed responses to points 1 to 5, 7 and 8 raised in this submission are provided in sections 2.10.2, 2.2.3, 2.5.3 and 2.4.3 of this report.

6. Realignment of carriageway

As noted in the section 4.6.18 of Chapter 4 of the EIAR:

“The Proposed Scheme has retained as far as practicable the existing horizontal and vertical layout along the route to minimise the amount of land acquisition required. However, in order to construct the Proposed Scheme, it is necessary to compulsorily acquire public and private plots of land along sections of the route.”

Section 4.5 of the Preliminary Design Report provided in the Supplementary Information outlines that as part of the alignment design process, the horizontal and vertical design has been optimised to minimise impact to the existing road network and adjoining properties where feasible.

Section 4.6 of the Preliminary Design Report provided in the Supplementary Information states the following:

“this section (Navan Road / Ashtown Road Junction to Navan Road / Old Cabra Road Junction) generally follows the existing horizontal alignment of the R147 Navan Road commencing at Ashtown Road junction and terminating at the Navan Road/Old Cabra Road junction. Where the proposed horizontal alignment of the R147 Navan Road deviates from the existing road alignment, the horizontal geometry has been developed in accordance with the geometric standards applicable to a design speed of 50 km/h identified in Section 4.1.”

In order to reduce impact on 200 Navan Road as suggested in the submission, this would require the proposed horizontal alignment to shift north. The proposed minimum footpath width north of 200 Navan Road is 1.8m, which is below the desirable minimum. Consequently, the footpath width cannot be reduced.

As noted in section 10.4.4.1.2.1 Land Take of Chapter 10 Population of Volume 2 of the EIAR, the impact on 200 Navan Road as a result of permanent land take is negative, slight and long term.

3.2.12 CPO-12 – Philomena Fortune (22 Belleville, Blackhorse Avenue)

3.2.12.1 Description of the Proposed Scheme at this location

In order to achieve the Proposed Scheme objectives along this section of the corridor on the R147 Navan Road, as described in section 4.5.4.1 of Chapter 4 of Volume 2 of the EIAR, the Proposed Scheme will generally consist of a bus lane and general traffic lane in each direction, with one-way cycle tracks alongside the proposed inbound and outbound bus lanes, each adjacent to a footpath. Permanent and temporary land take will be required from a number of properties, with the majority being residential.

The existing roundabout junction at Ashtown Road / Navan Road is proposed to be converted to a signalised junction. Bus lanes on the Navan Road approaches will be curtailed 20m from the junction to allow for left turning movement while a right-turn filter lane is provided for outbound traffic travelling onto Ashtown Road.

The existing road cross section in this location consists of a footpath and grass verge on the inbound side of the road and a footpath and two-way off-road cycle track on the outbound side with one general traffic lane in each direction and a bus lane in the inbound direction. A roundabout junction is provided at the location of Ashtown Road / Navan Road.

Lands are being permanently and temporarily acquired at the Belleville residential development along the R147 Navan Road. At this property the maximum width of land to be permanently acquired is 2.6m. This will require the relocation of the existing boundary wall and any adjacent landscaping / vegetation.

The relevant extract from the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description is shown in Figure 3.2.33, the existing aerial view in Figure 3.2.34, and existing street view in Figure 3.2.35.

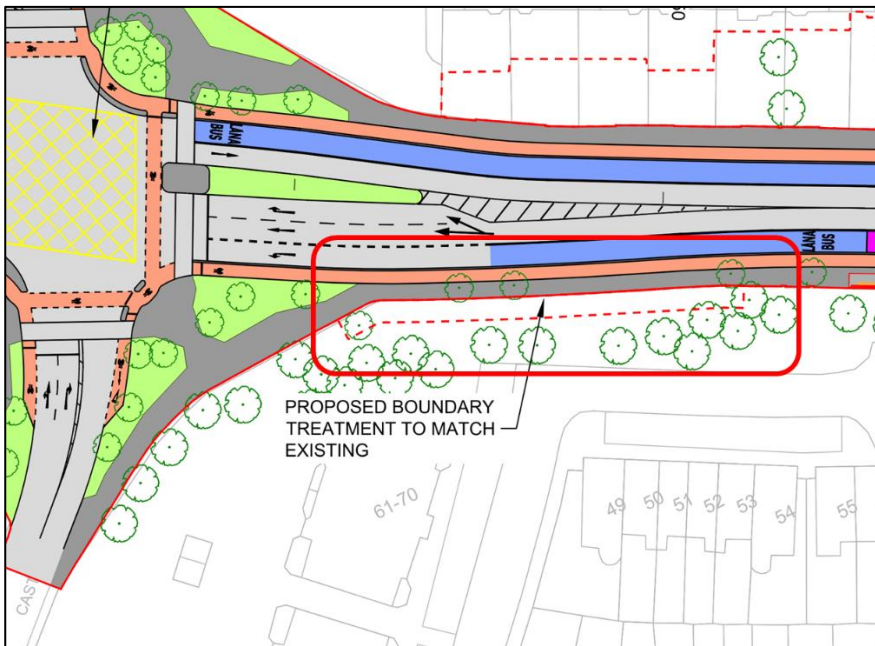


Figure 3.2.33: Proposed new Layout at Belleville



Figure 3.2.34: Existing aerial view at Belleville (Image Source: Google)



Figure 3.2.35: Existing Street View at Belleville (Image Source: Google)

3.2.12.2 Summary of Observations Raised

It is noted this submission objected to the Proposed Scheme and raised the following issues:

1. Removal and provision of trees
2. Removal of Ashtown Roundabout
3. Consultation Process

3.2.12.3 Response to Observations Raised

Detailed responses to the issues raised in this submission are provided in sections 2.2.3 and 2.10.2 of this report.

3.2.13 CPO-13 – Thomas Good (387 Navan Road)

3.2.13.1 Description of the Proposed Scheme at this location

In order to achieve the Proposed Scheme objectives along this section of the corridor on the R147 Navan Road, as described in section 4.5.4.1 of Chapter 4 of Volume 2 of the EIAR, the Proposed Scheme will generally consist of a bus lane and general traffic lane in each direction, with one-way cycle tracks alongside the proposed inbound and outbound bus lanes, each adjacent to a footpath. Permanent and temporary land take will be required from a number of properties, with the majority being residential.

The existing road cross section in this location consists of a footpath and grass verge on each side of the road with one general traffic lane and a bus lane in each direction.

At this property, the width of land to be temporarily acquired is approximately 13.0m in order to accommodate re-grading of the driveway to tie in with the proposed back of footpath. In order to achieve the desired design for the Proposed Scheme, temporary land acquisition is proposed from a number of properties in this area including 387 Navan Road.

The relevant extract from the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description is shown in Figure 3.2.36, the existing aerial view in Figure 3.2.37, and existing street view in Figure 3.2.38.

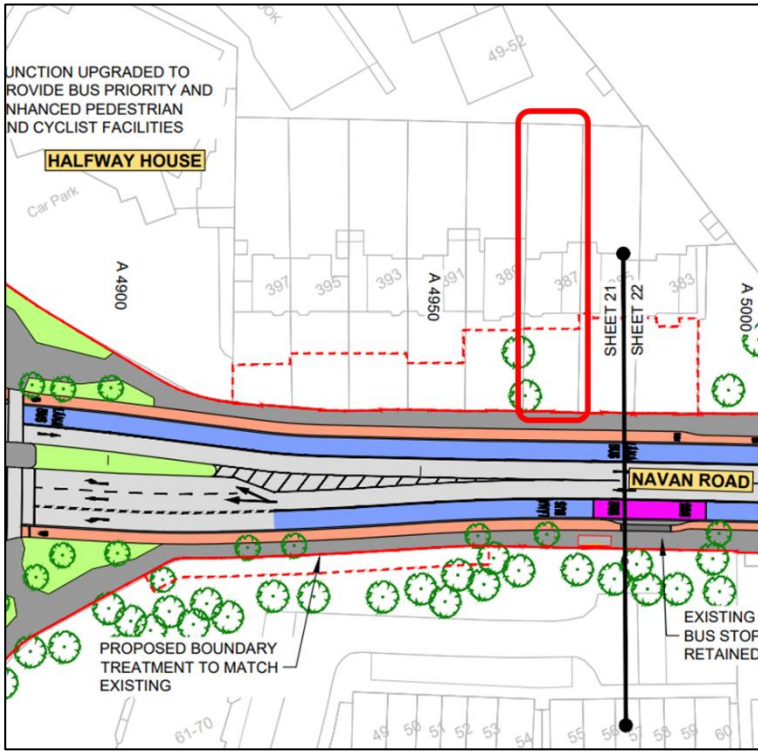


Figure 3.2.36: Proposed new Layout at 387 Navan Road



Figure 3.2.37: Existing aerial view at 387 Navan Road (Image Source: Google)



Figure 3.2.38: Existing Street View at 387 Navan Road (Image Source: Google)

3.2.13.2 Summary of Observations Raised

The submission welcomed the proposed Bus Corridor and road upgrades, however raised the following issues:

1. Removal of Ashtown roundabout
2. Removal and provision of trees
3. Quality and location of proposed cycle tracks

The submission raised concerns regarding safety, coherence, attractiveness and comfort of the proposed cycle facilities particularly at Bus Stops.

4. Old Cabra Road Bus Gates
5. Alternative Route Options
6. Consultation process

3.2.13.3 Response to Observations Raised

Detailed responses to the issues raised in points 1, 2, and 4 to 6 of this submission are provided in sections 2.2.3, 2.3.3 and 2.10.2 of this report.

3. Quality and location of proposed cycle tracks

One of the objectives for the Proposed Scheme is to enhance the potential for cycling by providing safe infrastructure, segregated from general traffic wherever practicable. Physical segregation ensures that cyclists are protected from motorised traffic and can bypass vehicular congestion, thus improving cyclist safety and reliability of journey times. Physical segregation can be provided in the form of vertical segregation, (e.g., raised kerbs), horizontal segregation (e.g., parking/verge protected cycle tracks), or both.

The cycle facilities provided along the Navan Road include new fully segregated cycle tracks provided on both sides in conjunction with new Toucan crossings and a two-way cycle crossing will be provided at the Navan Road / Old Cabra Road junction. These provisions are considered appropriate for the nature of the environment along the Navan Road as outlined in EIAR Chapter 4.6.3 Cycling Provision and align with the route status as a primary cycle route in the GDA Cycle Network Plan.

Section 4.6.3 of the EIAR describes the preferred provision of dedicated cycle facilities along the route:

“The ‘preferred cross-section template’ developed for the Proposed Scheme includes protected cycle tracks, providing vertical segregation from the carriageway to the cycle track and vertical segregation from the cycle track to the footpath.”

As noted in Section 4.6.3.5 of Chapter 4 Proposed Scheme Description of the EIAR:

“Junctions have been designed to facilitate a high level of safety, comfort, and priority for sustainable modes of travel (i.e. walking and cycling) and for public transport by prioritising the space and time allocated to these modes within the operation of a junction. “

Section 5.3 ‘Junction Geometry Design’ of the Preliminary Design Report discusses the basis of signalised junction design along the scheme whereby the provision for cyclists at junctions is a critical factor in managing conflict and providing safe junctions for all road users. Section 5.3 also outlines a number of junction types implemented along the scheme. The principles of junction types adopted along the Navan Road scheme are based on either a Type 1 or Type 3 junction layout.

Meanwhile, at priority junctions the preferred arrangement to be adopted consists of a single-direction, with-flow cycle track continuing with priority across the front of the side road on a raised entry treatment as outlined in section 8 of Appendix O of the EIAR, the BusConnects Preliminary Design Guidance Booklet (PDGB). This principle also applies at driveway accesses where the driveway is to be graded to tie-in with the level of the proposed footpath.

Further detailed responses relating to the aspects of general road safety and issues raised surrounding the provision of bus stops along the Proposed Scheme are provided in sections 2.2.3.8 and 2.2.3.9 of this report.

3.2.14 CPO-14 – Dermot Grogan (Phoenix Industrial Estate, Unit 5)

Lands are being acquired at the entrance to Phoenix Industrial Estate along the R147 Navan Road.

3.2.14.1 Description of the Proposed Scheme at this location

In order to achieve the Proposed Scheme objectives along this section of the corridor on the R147 Navan Road, as described in section 4.5.3.1 of Chapter 4 of Volume 2 of the EIAR, the Proposed Scheme will generally consist of a bus lane and general traffic lane in each direction, with a two-way cycle track alongside the proposed outbound bus lane. A footpath will be provided north and south of the carriageway. Permanent and temporary land take will be required from a number of properties.

A signalised junction will be provided along the R147 Navan Road at the location of Phoenix Park Avenue and Phoenix Industrial Estate, with an associated right-turn pocket provided for inbound vehicles turning right into Phoenix Park Avenue. A series of bus stops will be provided in the vicinity of the signalised junction.

The existing road cross section in this location consists of a dual carriageway layout with the two-lane outbound carriageway separated from the two-lane inbound carriageway by a median and vehicle restraint system. Left-in / left-out accesses are provided to the Phoenix Park residential development (on the outbound carriageway) and Phoenix Industrial Estate (on the inbound carriageway). A footpath is provided in the outbound direction. Along the inbound carriageway a footpath is provided from Phoenix Industrial Estate to Ashtown Roundabout. Between Phoenix Park Avenue and Auburn Avenue, the opposing carriageways are separated by a median.

Lands at this location are required to be permanently acquired to facilitate construction of the Proposed Scheme and facilitate tie-in of the existing access to the industrial estate. The area of land to be permanently acquired is approximately 93m². Additional temporary land take, approximately 101m², is also required to facilitate tie-in works.

The relevant extract from the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description is shown in Figure 3.2.39, the existing aerial view in Figure 3.2.40, and existing street view in Figure 3.2.41.

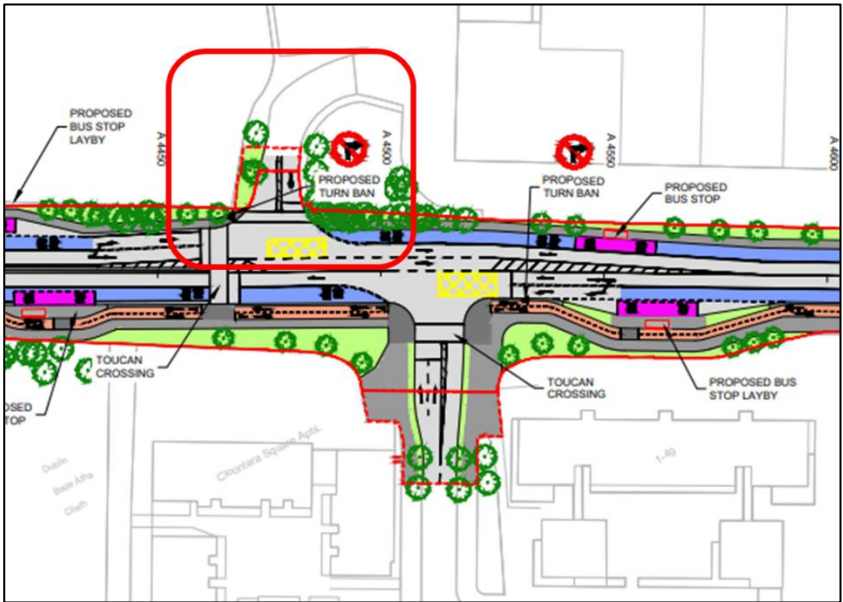


Figure 3.2.39: Proposed new Layout at Phoenix Industrial Estate

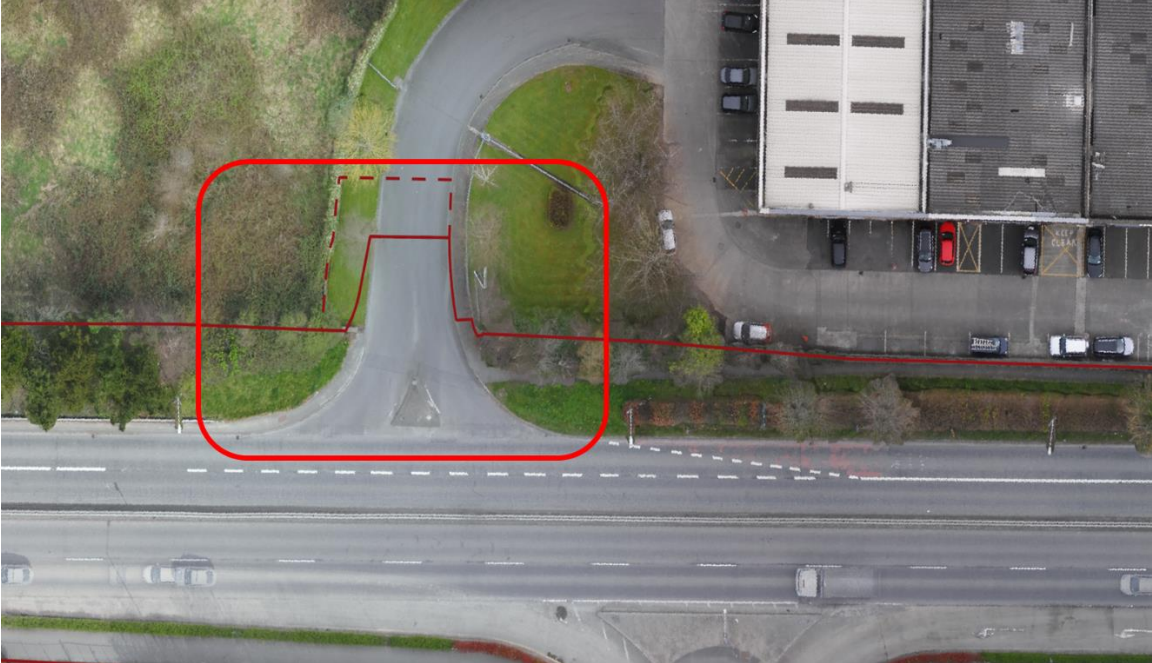


Figure 3.2.40: Existing aerial view at Phoenix Industrial Estate (Image Source: Google)



Figure 3.2.41: Existing Street View at Phoenix Industrial Estate (Image Source: Google)

3.2.14.2 Summary of Observations Raised

The submission raised an objection to the Proposed Scheme for the following reason:

1. Access and egress to industrial estate

The submission raised concerns over accessibility to the industrial estate both during construction and operational phases of the scheme.

3.2.14.3 Response to Observations Raised

1. Access and egress to industrial estate

Chapter 5 Construction of the EIAR describes details of the construction activities associated with the Proposed Scheme. Section 5.1 affirms that a competent contractor will be appointed to carry out the scheme works and presents details of the temporary traffic management measures, including the staging measures to be carried out to facilitate how vehicles, cyclists and pedestrians will be impacted and safely catered for, during the works.

The roads and streets along the Proposed Scheme will remain open to general traffic wherever practicable during the Construction Phase. Works will be constructed ensuring disturbances to residents, businesses and road users are minimised while maintaining the flow of all modes of traffic along the route wherever practicable. However, lane closures, road closures and diversions will be necessary to facilitate construction.

Section 5.5.3.1 states the following:

“The Proposed Scheme will be constructed in a manner which will minimise, as much as practicable, any disturbance to residents, businesses and road users. Road and street upgrade works will be completed in a Staged manner, as described in section 5.8.3, whereby traffic of all modes will be managed to ensure construction can continue while ensuring the safety of all road users, and personnel, and maintaining flow of all modes of traffic wherever practicable.”

As noted in section 5.5.3.2 Parking and 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.”

Details regarding temporary access provisions will be discussed with residents and business owners 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.”

3.2.15 CPO-15 – Robert Higgins (54 Belleville, Blackhorse Avenue)

3.2.15.1 Description of the Proposed Scheme at this location

In order to achieve the Proposed Scheme objectives along this section of the corridor on the R147 Navan Road, as described in section 4.5.4.1 of Chapter 4 of Volume 2 of the EIAR, the Proposed Scheme will generally consist of a bus lane and general traffic lane in each direction, with one-way cycle tracks alongside the proposed inbound and outbound bus lanes, each adjacent to a footpath. Permanent and temporary land take will be required from a number of properties, with the majority being residential.

The existing roundabout junction at Ashtown Road / Navan Road is proposed to be converted to a signalised junction. Bus lanes on the Navan Road approaches will be curtailed 20m from the junction to allow for left turning movement while a right-turn filter lane is provided for outbound traffic travelling onto Ashtown Road.

The existing road cross section in this location consists of a footpath and grass verge on the inbound side of the road and a footpath and two-way off-road cycle track on the outbound side with one general traffic lane in each direction and a bus lane in the inbound direction. A roundabout junction is provided at the location of Ashtown Road / Navan Road.

Lands are being permanently and temporarily acquired at the Belleville residential development along the R147 Navan Road. At this property the maximum width of land to be permanently acquired is approximately 2.6m. This will require the relocation of the existing boundary wall and any adjacent landscaping / vegetation.

The relevant extract from the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description is shown in Figure 3.2.42, the existing aerial view in Figure 3.2.43, and existing street view in Figure 3.2.44.

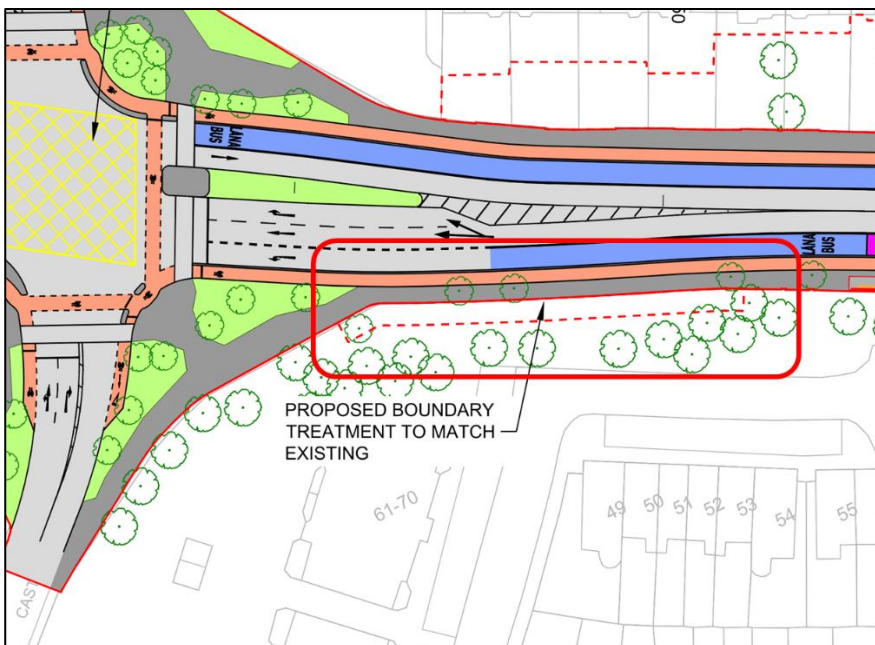


Figure 3.2.42: Proposed new Layout at Belleville



Figure 3.2.43: Existing aerial view at Belleville (Image Source: Google)



Figure 3.2.44: Existing Street View at Belleville (Image Source: Google)

3.2.15.2 Summary of Observations Raised

It is noted these submissions raised objections to the Proposed Scheme and raised the following issues:

1. Boundary Treatment

The submission raised concerns over the proposed demolition of the existing boundary wall and landscaping resulting in a deterioration in quality of life.

2. Castleknock Road / Blackhorse Avenue junction

3. Noise and vibration

4. Air quality

5. Removal of Ashtown Roundabout

6. Traffic Impact

7. Need for the Proposed Scheme

3.2.15.3 Response to Observations Raised

Detailed responses to the issues raised in points 2 to 7 of this submission are provided in sections 2.8.3, 2.2.3 and 2.10.2 of this report.

1. Boundary Treatment

Chapter 4 Proposed Scheme Description of the EIAR provides details on accommodation works and boundary treatments for the Proposed Scheme and confirms that boundary treatment works are to be replaced on a 'like for like' basis.

Section 4.6.18.1 'Summary of Accommodation Works and Boundary Treatment' states the following:

"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, unless a section of street can benefit from urban improvement appropriate to the area."

3.2.16 CPO-16 & CPO-18 – Gabrielle Kavanagh (309 Navan Road), Rosemary Kavanagh (309 Navan Road)

3.2.16.1 Description of the Proposed Scheme at this location

In order to achieve the Proposed Scheme objectives along this section of the corridor on the R147 Navan Road, as described in section 4.5.4.1 of Chapter 4 of Volume 2 of the EIAR, the Proposed Scheme will generally consist of a bus lane and general traffic lane in each direction, with one-way cycle tracks alongside the proposed inbound and outbound bus lanes, each adjacent to a footpath. Permanent and temporary land take will be required from a number of properties, with the majority being residential.

The existing road cross section in this location consists of a footpath, grass verge and on-road cycle lane on the inbound side of the road and a footpath and on-road cycle lane on the outbound side with one general traffic lane in each direction and a bus lane in the inbound direction.

At this property the width of land to be permanently acquired ranges between 1.0m and 1.3m. This will require the relocation of the existing boundary wall and any adjacent vegetation.

The relevant extract from the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description is shown in Figure 3.2.45, the existing aerial view in Figure 3.2.46, and existing street view in Figure 3.2.47.

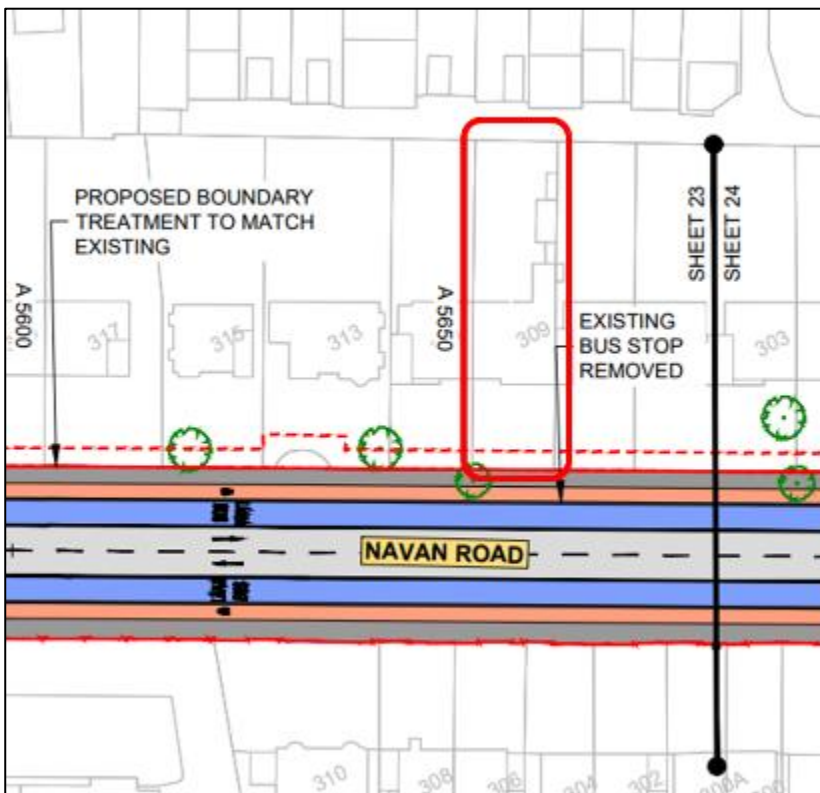


Figure 3.2.45: Proposed new Layout at 309 Navan Road



Figure 3.2.46: Existing aerial view at 309 Navan Road (Image Source: Google)



Figure 3.2.47: Existing Street View at 309 Navan Road (Image Source: Google)

3.2.16.2 Summary of Observations Raised

It is noted these submissions raised objections to the Proposed Scheme for the following reasons:

1. Air quality
2. Road safety
3. Driveway access

The submission raised concern regarding impacts of the Proposed Scheme on driveway access and egress.

3.2.16.3 Response to Observations Raised

A detailed response to the issues raised in points 1 and 2 of this submission are provided in section 2.2.3 of this report.

3. Driveway access

The permanent acquisition will result in the loss of approximately 1.3m with an additional 2.5m temporarily acquired to allow for the construction of boundary treatment works and tying into the existing garden/driveway. The edge of the proposed bus lane will be approximately 0.6m closer to the residence than the kerb of the existing general traffic lane. The 9.8m long front boundary wall, including gate and entrance pillars will be at least 10.1m from the front of the house. It is believed that this would not introduce any additional risk to the owners during the operation of the Proposed Scheme and that this should not hinder the availability of parking in the driveway.

The principle of how residents can access/egress their property is unchanged by the scheme proposals. The proposed access/egress scenario is similar to the existing with the requirement for a vehicle to be driven across a cycle lane/cycle track and footpath.

In accordance with Statutory Instrument S.I. No. 182/1997 - Road Traffic (Traffic and Parking) Regulations, 1997 Section 13 Driving on Footway and Section 14 Cycle Tracks, a vehicle is allowed to be driven across the footpath and/or Cycle Track for the purpose of access to or egress from an adjacent place. Furthermore, in accordance with S.I. No. 182/1997 Section 12 (3) reversing onto a public road from a place adjacent is not prohibited; "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."

In addition, as noted in Appendix M2 Stage 1 Road Safety Audit of the Preliminary Design Report:

"The scheme has been examined and this report compiled in respect of the consideration of those matters that have an adverse effect on road safety and considers the perspective of all road users."

All recommended measures or alternative measures proposed by the Designer were accepted by the Road Safety Audit Team.

3.2.17 CPO-17 – Niall and Antoinette Kavanagh (267 Navan Road)

3.2.17.1 Description of the Proposed Scheme at this location

In order to achieve the Proposed Scheme objectives along this section of the corridor on the R147 Navan Road, as described in section 4.5.4.1 of Chapter 4 of Volume 2 of the EIAR, the Proposed Scheme will generally consist of a bus lane and general traffic lane in each direction, with one-way cycle tracks alongside the proposed inbound and outbound bus lanes, each adjacent to a footpath. The inbound bus lane terminates 20m in advance of the Kinvara Avenue Junction to facilitate left-turning traffic. Permanent and temporary land take will be required from a number of properties, with the majority being residential.

The existing road cross section in this location consists of a footpath and an on-road cycle-lane, one general traffic lane and one bus lane in each direction.

At this property the width of land to be permanently acquired ranges between 2.2m and 2.5m. This will require the relocation of the existing boundary wall and any adjacent vegetation.

The relevant extract from the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description is shown in Figure 3.2.48, the existing aerial view in Figure 3.2.49, and existing street view in Figure 3.2.50.

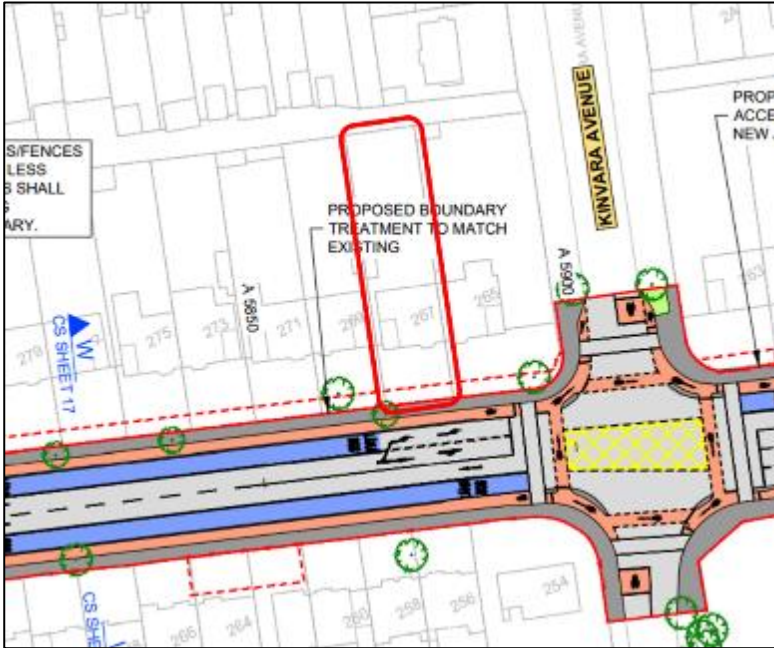


Figure 3.2.48: Proposed new Layout at 267 Navan Road



Figure 3.2.49: Existing aerial view at 267 Navan Road (Image Source: Google)



Figure 3.2.50: Existing Street View at 267 Navan Road (Image Source: Google)

3.2.17.2 Summary of Observations Raised

It is noted that this submission is both an objection to the CPO and a submission/observation, and requested an oral hearing. The objection to the CPO indicated that over four metres of land take to the front garden resulting in a total area of more than 36m².

1. Loss of driveway use during works

The submission raised concern about the loss of use of the private driveway for the duration of the works with no alternative parking arrangements made for the owners and/or visitors.

2. Permanent loss of driveway space

The submission stated that the proposed CPO will result in a reduction in driveway length of more than 2m (approx. 18m²) and will remove the ability to park two cars in the driveway and to use the driveway comfortably/safely.

The submission also stated that the reduction in driveway will hinder the ability to turn the car in the driveway and instead force the occupants to reverse onto the road, a manoeuvre which would be deemed illegal.

3. Alternative Route Options

3.2.17.3 Response to Observations Raised

A detailed response to the issues raised in point 3 of this submission is provided in section 2.2.3 of this report.

1. Loss of driveway use during works

As noted in section 5.5.3.2 Parking and Access of Chapter 5 Construction of Volume 2 of the EIAR:

“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.

Details regarding temporary access provisions will be discussed with residents and business owners 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. “

2. Permanent loss of driveway space

The permanent acquisition will result in the loss of between 2.4m and 2.5m of lands with an additional 2.5m temporarily required to allow for the construction of boundary treatment works and tying into the existing garden/driveway. The edge of the nearest proposed traffic lane will be 0.8m to 0.9m closer to the residence than the kerb of the existing general traffic lane. The 10.2m long front boundary wall, including pillars and entrance between the pillars will be at least 8.3m from the front of the house. It is believed that this would not introduce any additional risk to the owners during the operation of the Proposed Scheme with access and egress to/from the property achieved similar the current scenario and that this should not hinder the ability to park two cars in the driveway.

The principle of how residents can access/egress their property is unchanged by the scheme proposals. The existing access/egress scenario is similar to the proposed with the requirement for a vehicle to be driven across a cycle lane/cycle track and footpath. The objection notes that it is illegal to reverse onto a 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.

In addition, as noted in Appendix M2 Stage 1 Road Safety Audit of the Preliminary Design Report:

“The scheme has been examined and this report compiled in respect of the consideration of those matters that have an adverse effect on road safety and considers the perspective of all road users.”

All recommended measures or alternative measures proposed by the Designer were accepted by the Road Safety Audit Team.

3.2.18 CPO-19 – Déirdre Kirwan (265 Navan Road)

3.2.18.1 Description of the Proposed Scheme at this location

In order to achieve the Proposed Scheme objectives along this section of the corridor on the R147 Navan Road, as described in section 4.5.4.1 of Chapter 4 of Volume 2 of the EIAR, the Proposed Scheme will generally consist of a bus lane and general traffic lane in each direction, with one-way cycle tracks alongside the proposed inbound and outbound bus lanes, each adjacent to a footpath. The inbound bus lane terminates 20m in advance of the Kinvara Avenue Junction to facilitate left-turning traffic. Permanent and temporary land take will be required from a number of properties, with the majority being residential.

On Kinvara Avenue, the junction area is treated locally to facilitate tie-in with the Core Bus Corridor. The existing two lanes of general traffic are retained along with the footpath in each direction. The cross-section at the junction area is modified to facilitate the introduction of a short length of cycle lanes in each direction to facilitate a protected junction accommodating cyclists.

The existing Navan Road cross section in this location consists of a footpath and an on-road cycle-lane, one general traffic lane and one bus lane in each direction.

At this property the width of land to be permanently acquired is 2.2m, tapering to 0.0m to tie-in with the existing boundary. This will require the relocation of the existing boundary wall and any adjacent vegetation.

The relevant extract from the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description is shown in Figure 3.2.51, the existing aerial view in Figure 3.2.52, and existing street views in Figure 3.2.53 and Figure 3.2.54.



Figure 3.2.53: Existing Street View at 265 Navan Road, Image 1 [Looking from Navan Road] (Image Source: Google)



Figure 3.2.54: Existing Street View at 265 Navan Road, Image 2 [Looking from Kinvara Ave Junction] (Image Source: Google)

3.2.18.2 Summary of Observations Raised

It is noted that this submission raised a number of observations and concerns as follows:

1. Change in travel demand and patterns of travel due to COVID-19 pandemic
2. Impact on the natural environment

The submission stated that the proposal to remove trees along the route to facilitate widening contradicts climate change mitigation measures. The submission also states that a decrease to the natural environment will have a negative impact on the mental health of local residents.

Additionally, the submission stated that the removal of garden space will result in an impact to mature trees, grass, shrubs and hedging some of which will be irreplaceable.

3. Loss of privacy

The submission states that the increased land take with the removal of a portion of the existing garden would compromise privacy.

4. Noise and vibration

3.2.18.3 *Response to Observations Raised*

Detailed responses to the issues raised in points 1 and 4 of this submission are provided in sections 2.10.2 and 2.2.3 of this report.

2. Impact on the natural environment

Refer to section 2.2.3.4 of this report for a detailed response on the issue surrounding the removal of trees raised in point 2. of this submission.

The submission develops further and raises additional concerns in relation to impacts on the natural environment resulting from the removal of garden space/area. The following information is therefore applicable to addresses the observation in full.

Impacts to the garden space along the frontage of the property is envisaged with the relocation of the existing boundary wall. This, in conjunction with any associated impact to landscaping and vegetation within the private property would be regarded as accommodation works and boundary treatment. Chapter 4 Proposed Scheme Description of the EIAR provides details on accommodation works and boundary treatments for the Proposed Scheme and confirms that boundary treatment works are to be replaced on a 'like for like' basis.

Section 4.6.18.1 'Summary of Accommodation Works and Boundary Treatment' of Chapter 4 of Volume 2 of the EIAR states the following:

"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, unless a section of street can benefit from urban improvement appropriate to the area."

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. Loss of privacy

The permanent acquisition will result in the loss of a strip of land along the frontage of the property, 2.2m maximum width and a total area of 31.2m² resulting in a reduction to both driveway and garden space. An additional 2.5m strip width is temporarily required to allow for the construction of boundary treatment works and tying into the existing garden/driveway. The edge of the proposed nearest traffic lane will be 0.6m closer to the residence than the kerb of the existing general traffic lane. The front boundary wall will be at least 8.3m from the front of the house.

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, as previously noted, 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.

3.2.19 CPO-20 – Patricia Lawler (313 Navan Road)

3.2.19.1 *Description of the Proposed Scheme at this location*

In order to achieve the Proposed Scheme objectives along this section of the corridor on the R147 Navan Road, as described in section 4.5.4.1 of Chapter 4 of Volume 2 of the EIAR, the Proposed Scheme will generally consist of a bus lane and general traffic lane in each direction, with one-way cycle tracks alongside the proposed inbound and outbound bus lanes, each adjacent to a footpath. Permanent and temporary land take will be required from a number of properties, with the majority being residential.

The existing road cross section in this location consists of a footpath, grass verge and on-road cycle lane on the inbound side of the road and a footpath and on-road cycle lane on the outbound side with one general traffic lane in each direction and a bus lane in the inbound direction.

At this property the width of land to be permanently acquired ranges between approximately 0.6m and 0.8m. This will require the relocation of the existing boundary wall and any adjacent vegetation.

The relevant extract from the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description is shown in Figure 3.2.55, the existing aerial view in Figure 3.2.56, and existing street view in Figure 3.2.57.

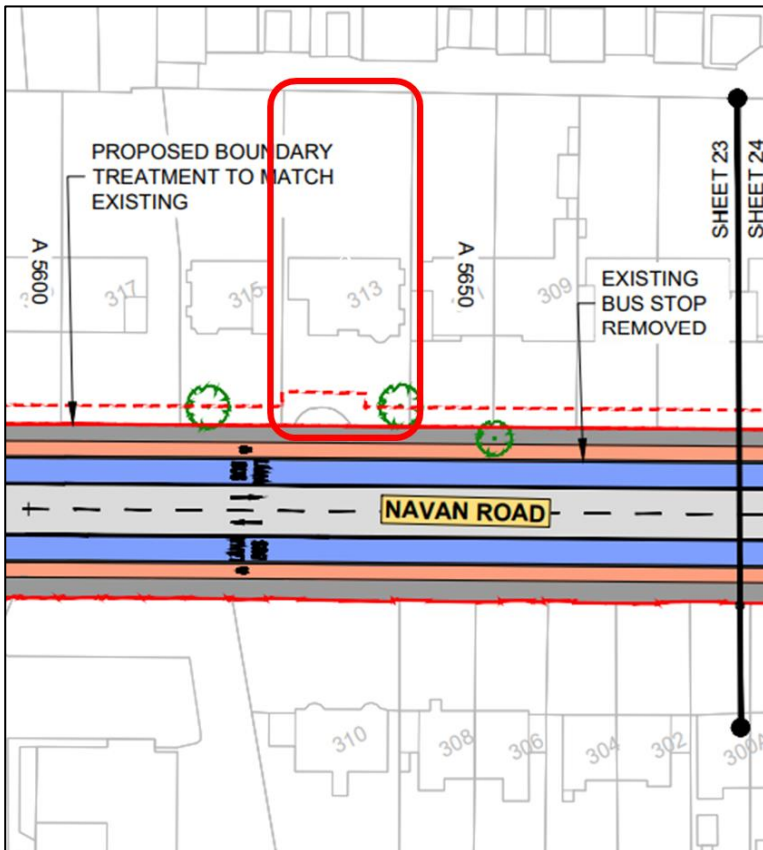


Figure 3.2.55: Proposed new Layout at 313 Navan Road



Figure 3.2.56: Existing aerial view at 313 Navan Road (Image Source: Google)



Figure 3.2.57: Existing Street View at 313 Navan Road (Image Source: Google)

3.2.19.2 Summary of Observations Raised

The submission has been made by property consultants and agronomists Corr, acting on behalf of Patricia Lawler of 313 Navan Road. The submission requested an oral hearing and raised objections to the Proposed Scheme.

The submission raised the following issues:

1. Driveway access and parking

The submission stated that there is a lack of detail regarding impacts on access to the property and parking.

2. Boundary treatment

The submission stated that there is a lack of detail regarding boundary treatment along the CPO boundary.

3. CPO schedule and timeline

The submission stated that the CPO schedule lacked detail on timelines.

4. Removal and provision of trees

3.2.19.3 Response to Observations Raised

A detailed response to the issues raised in point 4 of this submission has been provided in section 2.2.3.4 of this report.

1. Driveway access and parking

The permanent acquisition will result in the loss of a maximum of 0.8m to the driveway entrance with an additional 2.0m – 4.0m of land temporarily acquired to allow for the construction of boundary treatment works and tie-in to the existing garden/driveway. The edge of the proposed bus lane generally coincides with the kerb of the existing general traffic lane. The front boundary wall will be set back at least 9.7m from the front of the house and entrance pillars (set back as per existing) will be at least 8.5m from the front of the house. It is believed that this would not introduce any additional risk to the owners during the operation of the Proposed Scheme and that this should not hinder parking in the driveway.

The principle of how residents can access/egress their property is unchanged by the scheme proposals. The proposed access/egress scenario is similar to the existing with the requirement for a vehicle to be driven across a cycle lane/cycle track and footpath.

With reference to the construction phase of the Proposed Scheme and as outlined in section 5.5.3.2 Parking and Access of Chapter 5 Construction of Volume 2 of the EIAR:

“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. Details regarding temporary access provisions will be discussed with residents and business owners 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.”

2. Boundary Treatment

Chapter 4 Proposed Scheme Description of the EIAR provides details on accommodation works and boundary treatments for the Proposed Scheme and confirms that boundary treatment works are to be replaced on a ‘like for like’ basis.

Section 4.6.18.1 ‘Summary of Accommodation Works and Boundary Treatment’ states the following:

“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, unless a section of street can benefit from urban improvement appropriate to the area.”

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. CPO schedule and timeline

Section 5.3.4.1 Section 4a: Ashtown Road Junction to Baggot Road of Chapter 5 Construction of Volume 2 of the EIAR provides details of the construction activities along Navan Road, between Ashtown Road Roundabout and Baggot Road, Kinvara Avenue Junction. The expected construction duration for the section will be approximately 12 months. In relation to the plot, this has yet to be determined and is dependent on the extent of the works required in consultation with the plot owner/occupier. It will only be required for the duration of the works to the plot.

3.2.20 CPO-21 – John Leatham (149 Navan Road)

3.2.20.1 Description of the Proposed Scheme at this location

In order to achieve the Proposed Scheme objectives along this section of the corridor on the R147 Navan Road, as described in section 4.5.4.1 of Chapter 4 of Volume 2 of the EIAR, the Proposed Scheme will generally consist of a bus lane and general traffic lane in each direction, with one-way cycle tracks alongside the proposed inbound and outbound bus lanes, each adjacent to a footpath. Permanent and temporary land take will be required from a number of properties, with the majority being residential.

The existing road cross section in this location consists of a footpath and on-road cycle lane on the inbound side of the road and a footpath and on-road cycle lane on the outbound side with one general traffic lane and one bus lane in each direction. An island bus stop is provided on the outbound carriageway.

At this property the width of land to be permanently acquired ranges between approximately 2.6m and 2.7m. This will require the relocation of the existing boundary wall and any adjacent vegetation.

The relevant extract from the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description is shown in Figure 3.2.58, the existing aerial view in Figure 3.2.59, and existing street view in Figure 3.2.60

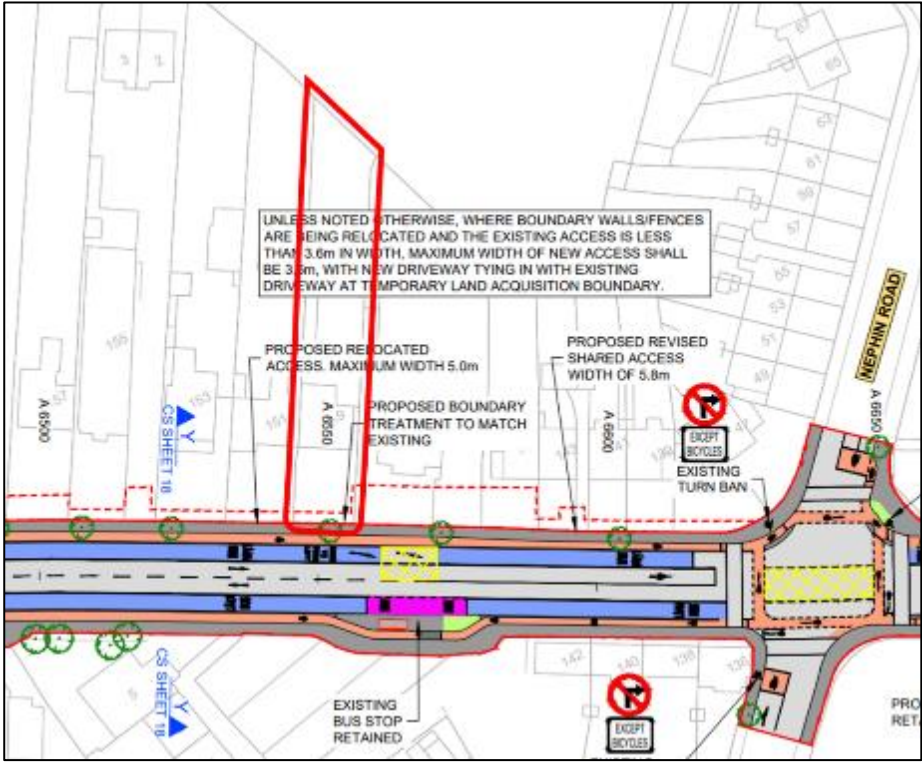


Figure 3.2.58: Proposed new Layout at 149 Navan Road



Figure 3.2.59: Existing aerial view at 149 Navan Road (Image Source: Google)



Figure 3.2.60: Existing Street View at 149 Navan Road (Image Source: Google)

3.2.20.2 Summary of Observations Raised

This submission objected to CPO for the reasons summarised in the following section.

1. Consultation process
2. Old Cabra Road Bus Gates
3. Alternative measures (congestion charging)
4. Phoenix Park plans

The submission stated that the NTA assessment makes no reference to the plans to move traffic out of the Park and onto Blackhorse Avenue and Navan Road, further impacting on the situation.

5. Removal and provision of trees
6. Design justification

The submission stated that the Proposed Scheme has been developed without a systematic review and approach. The submission proposed a one-way cycle track of 1.8m width and a two-way cycle track of 3.6m width throughout the scheme. It objected to a 2.5m wide footpath and cycle track being proposed outside the property and noted that there is no study or report to support provision of a 2.5m path to replace the current 2m path at this property.

7. Boundary Treatments

The submission requested information regarding a ‘like for like’ solution and what will replace mature/established trees.

8. Compulsory Purchase Order (CPO) process
9. Impact on property value
10. Traffic Impact
11. Noise and vibration
12. Air quality
13. Bus journey time and reliability

14. Change in travel demand and patterns of travel due to the COVID-19 pandemic

The submission ended with a request for an oral hearing and postponement of the planning application process.

3.2.20.3 Response to Observations Raised

Detailed responses to the issues raised in points 1 to 3, 5 and 8 to 14 of this submission are provided in sections 2.10.2, 2.3.3 and 2.2.3 of this report.

4. Phoenix Park Plans

For the qualitative analysis, the transport assessment is in relation to the conditions of the existing transport network, which have been outlined in Section 6.3 (Baseline Environment) of Chapter 6 of Volume 2 of the EIAR, corresponding with a ‘Do Nothing’ scenario.

Traffic management measures were introduced in Phoenix Park in February 2022 which at the time of the planning application were the subject of a 9-month pilot study. Consequently, they were not considered in the impact assessments.

6. Design justification

As stated in Chapter 1 Introduction of the EIAR, the aim 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. The Proposed Scheme will greatly improve transport services for all that live along the route of the Proposed Scheme, including on Navan Road, by providing significantly improved sustainable transport options.

The Proposed Scheme will 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. In order to achieve the Proposed Scheme objectives along this section of the corridor on the R147 Navan Road, as described in paragraph 4.5.4.1 of Chapter 4 of Volume 2 of the EIAR:

“the Proposed Scheme will generally consist of a bus lane and general traffic lane in each direction, with one-way cycle tracks alongside the proposed inbound and outbound bus lanes.”

Section 4.6 of Chapter 4 Proposed Scheme Description of Volume 2 of the EIAR outlines the main infrastructure elements associated with the Proposed Scheme.

“The cross-sectional design of the mainline has been developed to achieve the desirable width criteria contained within the PDGB and TII Publications wherever reasonably practicable as outlined in table 4.29, table 4.30 and table 4.31.”

At the location of 149 Navan Road, the widths of each infrastructure element conform with the desirable/preferred widths as outlined in Section 4.6 of Chapter 4 of Volume 2 of the EIAR and are summarised in Table 3.2.2.

Table 3.2.2: Summary of key infrastructure element widths

Element	Width
Bus lane:	3.0m
Traffic lane:	3.0m
Cycle track:	2.0m (including 0.25m kerb)
Footpath:	2.0m

7. Boundary Treatments

Chapter 4 Proposed Scheme Description of the EIAR provides details on accommodation works and boundary treatments for the Proposed Scheme and confirms that boundary treatment works are to be replaced on a 'like for like' basis.

Section 4.6.18.1 Summary of Accommodation Works and Boundary Treatment of Chapter 4 states the following:

“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, unless a section of street can benefit from urban improvement appropriate to the area.”

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.

3.2.21 CPO-22 – Willie P Munnely (9 Fairhaven Walk, Castleknock)

Lands are being temporarily acquired at the entrance to Phoenix Park residential development along the R147 Navan Road.

3.2.21.1 Description of the Proposed Scheme at this location

In order to achieve the Proposed Scheme objectives along this section of the corridor on the R147 Navan Road, as described in section 4.5.3.1 of Chapter 4 of Volume 2 of the EIAR, the Proposed Scheme will generally consist of a bus lane and general traffic lane in each direction, with a two-way cycle track alongside the proposed outbound bus lane. A footpath will be provided north and south of the carriageway. Permanent and temporary land take will be required from a number of properties.

A signalised junction will be provided along the R147 Navan Road at the location of Phoenix Park Avenue and Phoenix Industrial Estate, with an associated right-turn pocket provided for inbound vehicles turning right into Phoenix Park Avenue.

Toucan crossings are also proposed to safely accommodate vulnerable road users through the junction. This replaces the existing left in / left out junction arrangement and ensures all movements are facilitated safely. A series of bus stops will be provided in the vicinity of the signalised junction.

The existing road cross section in this location consists of a dual carriageway layout with the two-lane outbound carriageway separated from the two-way inbound carriageway by a median and vehicle restraint system. Left-in left-out only accesses are provided to the Phoenix Park residential development (on the outbound carriageway) and Phoenix Industrial Estate (on the inbound carriageway). A footpath is provided in the outbound direction. Along the inbound carriageway a footpath is provided from Phoenix Park retail park to Ashtown Roundabout. Between Phoenix Park Avenue and Auburn Avenue, the opposing carriageways are separated by a median.

Lands at this location are required to be permanently acquired to facilitate construction of the upgraded Phoenix Park Avenue junction and facilitate tie-in of the existing access to the residential development. The area of land to be permanently acquired is approximately 210m² (6.5m of the access). Additional temporary land take, 456m² in area, is also required to facilitate construction and regrade works.

The relevant extract from the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description is shown in Figure 3.2.61, the existing aerial view in Figure 3.2.62, and existing street view in Figure 3.2.63.

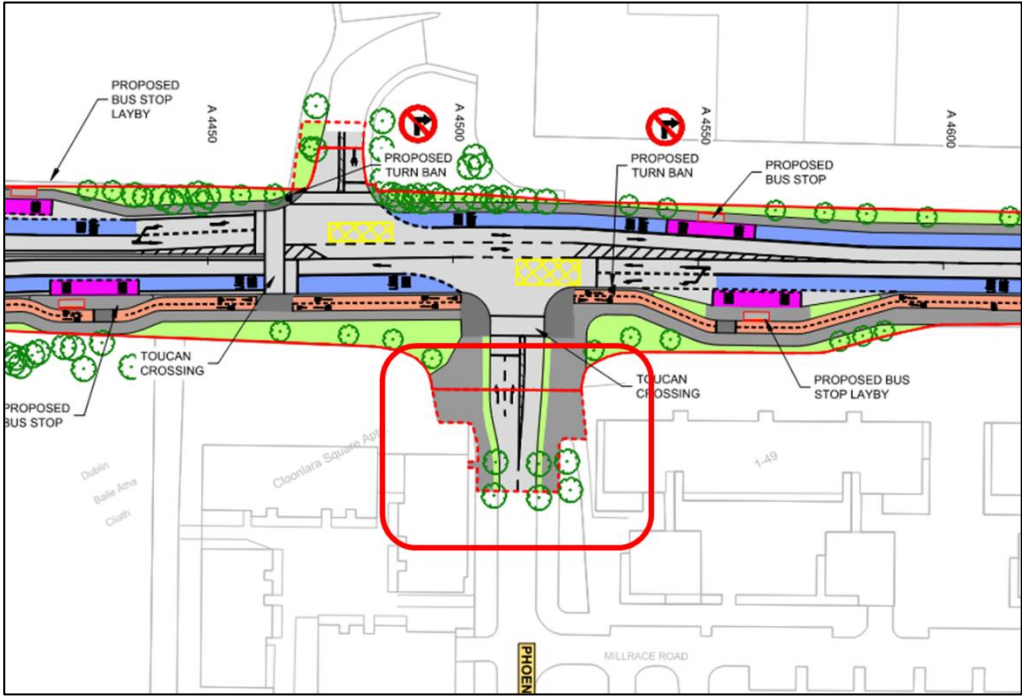


Figure 3.2.61: Proposed new Layout at Phoenix Park Avenue

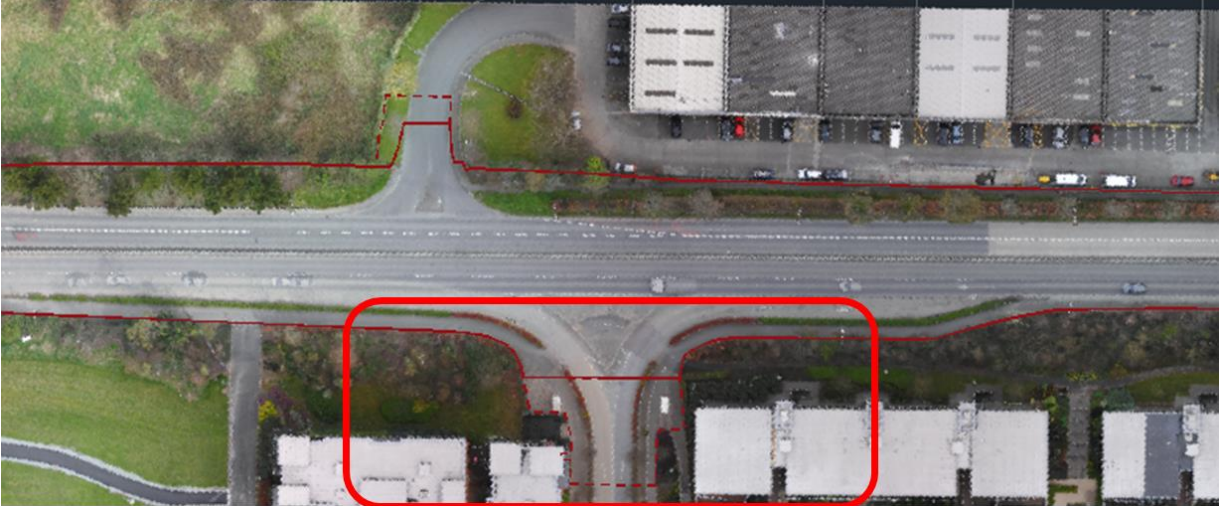


Figure 3.2.62: Existing aerial view at Phoenix Park Avenue (Image Source: Google)

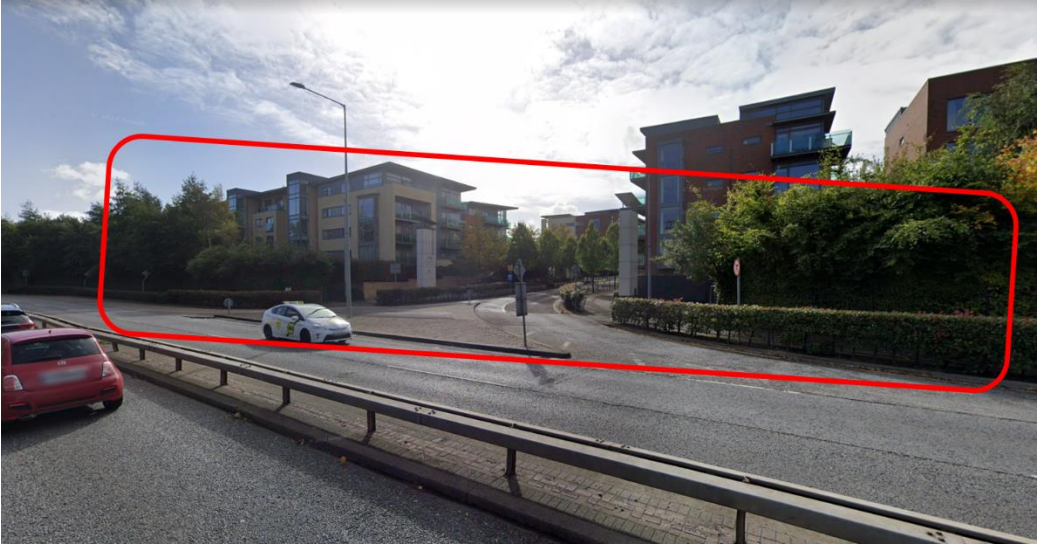


Figure 3.2.63: Existing Street View at Phoenix Park Avenue (Image Source: Google)

3.2.21.2 *Summary of Observations Raised*

The submission raised an objection to the temporary CPO.

1. Permanent CPO

The submission raised concerns over land acquisition of property which was purchased in recent years.

3.2.21.3 *Response to Observations Raised*

1. Permanent CPO

At the entrance to Phoenix Park residential development, an area of land is required to be permanently acquired to facilitate construction of the Proposed Scheme and facilitate tie-in of the existing access to the residential development. The area of land to be permanently acquired is approximately 210m² (6.5m of the access area).

It should be noted that there is no intention to acquire any building within the Phoenix Park residential development and the buildings themselves will not be directly affected by the CPO. The details of the extents of the CPO are shown on the Compulsory Purchase Order Schedule and associated Deposit Maps.

3.2.22 CPO-23 – Shane and Yvonne Nolan (116 Navan Road)

3.2.22.1 *Description of the Proposed Scheme at this location*

In order to achieve the Proposed Scheme objectives along this section of the corridor on the R147 Navan Road, as described in section 4.5.4.1 of Chapter 4 of Volume 2 of the EIAR, the Proposed Scheme will generally consist of a bus lane and general traffic lane in each direction, with one-way cycle tracks alongside the proposed inbound and outbound bus lanes, each adjacent to a footpath. Permanent and temporary land take will be required from a number of properties, with the majority being residential.

The existing road cross section in this location consists of a footpath on the inbound side of the road and a footpath and on-road cycle lane on the outbound side. One general traffic lane exists in each direction with an inbound bus lane provided. Existing mature trees are located within the footpath along the Navan Road on both sides.

At this property the width of land to be temporarily acquired is approximately 6.0m. Permanent land take is not proposed at this property.

The relevant extract from the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description is shown in Figure 3.2.64, the existing aerial view in Figure 3.2.65, and existing street view in Figure 3.2.66.

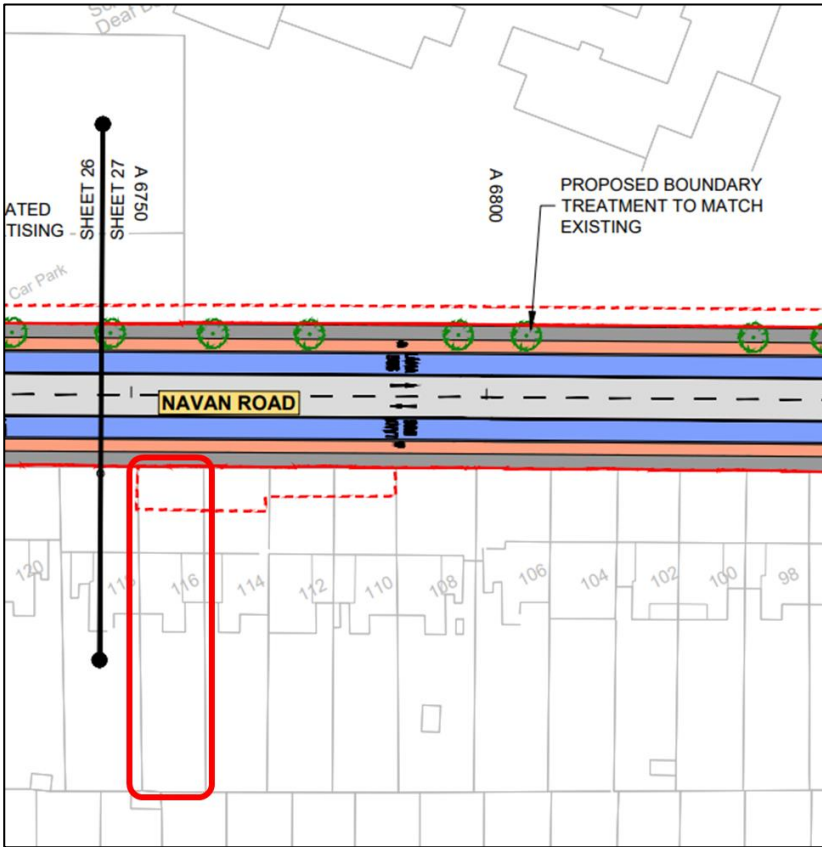


Figure 3.2.64: Proposed new Layout at 116 Navan Road



Figure 3.2.65: Existing aerial view at 116 Navan Road (Image Source: Google)



Figure 3.2.66: Existing Street View at 116 Navan Road (Image Source: Google)

3.2.22.2 Summary of Observations Raised

The submission raised an objection to the temporary CPO on the basis that the Proposed Scheme presents a risk of damage and loss to sole form of home heating (geothermal energy). The issue raised is summarised below:

1. Temporary CPO and impact to heating infrastructure

The submission stated that infrastructure associated with the geothermal heating system (borehole and pipe network) is located within the front garden coinciding with the area of land to be temporary acquired.

The occupants have been informed previously through correspondence that works were intended for the purposes of levelling the garden area. However, the submission noted that the occupants have not received written confirmation that the heating infrastructure will not be impacted during the works.

The submission further raised concerns that the borehole is designed to withstand light, domestic traffic only and not any additional loading arising from construction/site traffic.

Additionally, the submission questioned why the extent of temporary CPO is significantly greater than adjacent properties.

3.2.22.3 Response to Observations Raised

1. Temporary CPO and impact to heating infrastructure

At 116 Navan Road, temporary land acquisition of approximately 6.0m width is proposed. As noted in section 4.5.4.10 of Chapter 4 ‘Proposed Scheme Description’ of Volume 2 of the EIAR:

“Temporary land take is also required from properties to allow driveways and accesses to be regraded.”

In order to facilitate the proposed cross-section at 116 Navan Road, it will be necessary to raise the footpath level by approximately 150 mm where it ties in with the driveway. As a result, it is envisaged that local regrading works to the driveway/access and garden area will be required to facilitate tie-in of the existing driveway area with the Proposed Scheme.

As set out in section 19.5.1.1 of Chapter 19 of Volume 2 of the EIAR:

“all possible precautions will be taken by the appointed contractor to avoid unplanned interruptions to any services during the Construction Phase of the Proposed Scheme.”

This will include appropriate investigation by the appointed contractor to identify the precise location of all utility infrastructure within the working areas prior to the commencement of excavation works. Where works are required in and around known utility infrastructure, precautions will be implemented by the appointed contractor to protect the infrastructure from damage, in accordance with best practice methodologies and the requirements of the utility companies, where practicable.

Protection measures during construction will include warning signs and markings indicating the location of utility infrastructure, safe digging techniques in the vicinity of known utilities, and in certain circumstances where possible, isolation of the section of infrastructure during works in the immediate vicinity.”

3.2.23 CPO-24 & CPO-31 – Michael O’Neill (CPO-24, 139 Navan Road) and Mabel E Tremble (CPO-31, 137 Navan Road)

3.2.23.1 Description of the Proposed Scheme at this location

In order to achieve the Proposed Scheme objectives along this section of the corridor on the R147 Navan Road, as described in section 4.5.4.1 of Chapter 4 of Volume 2 of the EIAR, the Proposed Scheme will generally consist of a bus lane and general traffic lane in each direction, with one-way cycle tracks alongside the proposed inbound and outbound bus lanes, each adjacent to a footpath. Permanent and temporary land take will be required from a number of properties, with the majority being residential.

On Nephin Road, the junction area will be treated locally to facilitate tie-in with the Core Bus Corridor. The existing two lanes of general traffic will be retained along with the footpath in each direction. The cross-section at the junction area will be modified to facilitate the introduction of a short length of cycle lane in each direction to accommodate cyclists.

The existing road cross section in this location consists of a footpath and cycle lane on each side of the road with one outbound general traffic lane and two inbound general traffic lanes.

At 137 Navan Road the width of land to be permanently acquired ranges between 1.0m and 0m at the tie-in with the existing boundary along Nephin Road. At 139 Navan Road the width of land to be permanently acquired ranges between 1.0m and 1.1m. The permanent land take will require the relocation of the existing boundary wall and any adjacent vegetation.

The relevant extract from the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description is shown for the property at 137 Navan Road in Figure 3.2.67, the existing aerial view in Figure 3.2.68, and existing street view in Figure 3.2.69. Similarly for the property at 139 Navan Road the extract from the General Arrangement Drawings is shown in Figure 3.2.70, the existing aerial view in Figure 3.2.71, and existing street view in Figure 3.2.72.

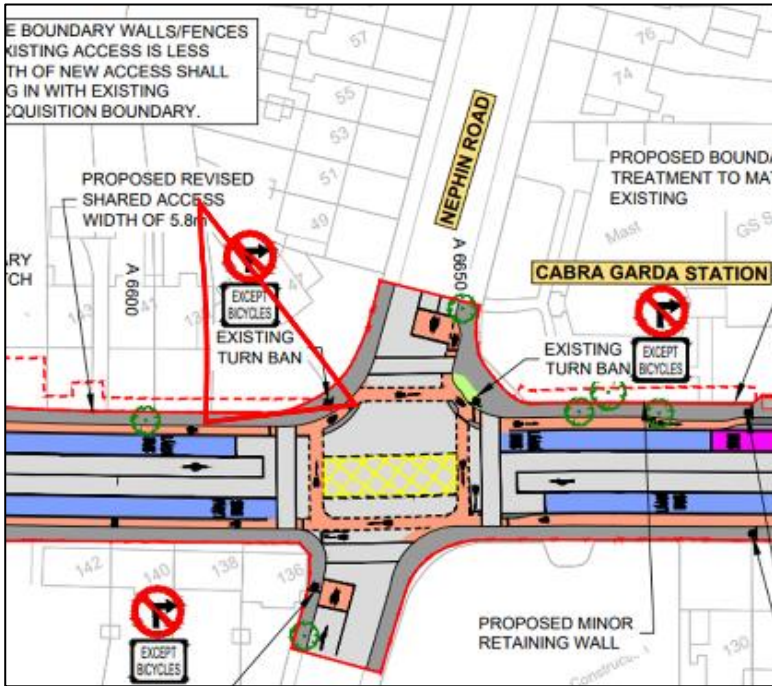


Figure 3.2.67: Proposed new Layout at 137 Navan Road



Figure 3.2.68: Existing aerial view at 137 Navan Road (Image Source: Google)



Figure 3.2.69: Existing Street View at 137 Navan Road (Image Source: Google)

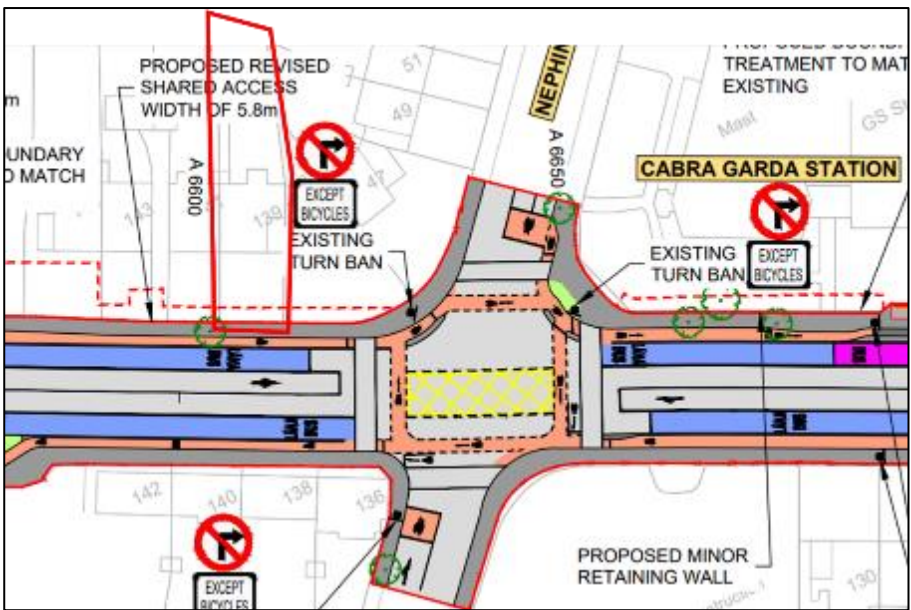


Figure 3.2.70: Proposed new Layout at 139 Navan Road



Figure 3.2.71: Existing aerial view at 139 Navan Road (Image Source: Google)



Figure 3.2.72: Existing Street View at 139 Navan Road (Image Source: Google)

3.2.23.2 Summary of Observations Raised

The submissions received from Colliers International, instructed on behalf of Michael O'Neill and Mary Tremble, raised objections to the Proposed Scheme from the occupants of 137 and 139 Navan Road.

The submissions raised the following issues:

1. Temporary CPO

The submission stated that temporary acquisition of land is excessive and not required for construction of the Proposed Scheme.

2. Mitigation measures to protect the property

The submission stated that there is insufficient detail in respect of mitigation measures to protect the property during the Construction and Operational phases of the Proposed Scheme.

3. Boundary Treatment

The submission stated that details of boundary treatment and ground reinstatement have not been made available.

4. Driveway access and parking

The submission raised concerns over potential impacts on the ability to park cars in the driveway due to reduced driveway space. Additional concerns were also raised over access and parking arrangements during construction.

5. Services and utilities

The submission requested confirmation that all services connected to the property will be maintained throughout construction and should interruption to services be required, details of alternative supply arrangements are requested.

6. Insufficient drawing information

The submission stated that insufficient drawing information was submitted to support the planning application; the submission noted that full drawings including elevations, cross-sections, vertical and horizontal sections should be provided, and that no consideration has been given to the impact on the property.

The submissions concluded requesting an oral hearing.

3.2.23.3 *Response to Observations Raised*

1. Temporary CPO

At both properties 137 and 139 Navan Road, temporary land acquisition of 2.0m in width is proposed. As noted in section 4.5.4.10 of Chapter 4 ‘Proposed Scheme Description’, temporary land acquisition is required for properties along the Navan Road, including 137 and 139 Navan Road, to facilitate the construction of the replacement boundary and regrading of the driveway/access.

“This section of the Proposed Scheme progresses through an established residential area with education, retail, employment and community uses along the Navan Road. In this area, permanent land take is required from properties to accommodate widening required for the Proposed Scheme, resulting in the need to relocate boundary walls and gates at these properties. In this section temporary land take will be needed at these properties to construct new boundaries walls. Temporary land take is also required from properties to allow driveways and accesses to be regraded.”

2. Mitigation measures to protect the property

Refer to section 2.2.3.7 of this report for information on noise and vibration and how effects will be mitigated. Refer to section 2.2.3.6 of this report for information on air quality and how effects will be mitigated. Refer to section 2.2.3.5 for information on the traffic impact.

Section 6.5.1 Construction Phase of Chapter 6 Traffic and Transport of Volume 2 of the EIAR outlines the following regarding the mitigation for the traffic impact:

“A Construction Environmental Management Plan (CEMP) has been prepared and is included as Appendix A5.1 in Volume 4 of this EIAR. The CEMP which will be updated and finalised by the appointed contractor prior to construction commencing. The CEMP comprises the construction mitigation measures, which are set out in this EIAR, and will be updated with any additional measures which may be required by the conditions attached to An Bord Pleanála’s decision. Implementation of the CEMP will ensure disruption and nuisance are kept to a minimum during the Construction Phase. The CEMP has regard to the guidance contained in the TII Guidelines for the Creation, Implementation and Maintenance of an Environmental Operating Plan, and the handbook published by Construction Industry Research and Information Association (CIRIA) in the UK, Environmental Good Practice on Site Guide, 4th Edition (CIRIA 2015). All of the content provided in this CEMP will be implemented in full by the appointed contractor and its finalisation will not affect the robustness and adequacy of the information presented and relied upon in this EIAR.

A detailed Construction Traffic Management Plan will subsequently be prepared by the appointed contractor prior to construction, including Temporary Traffic Management arrangements prepared in accordance with Department of Transport’s ‘Traffic Signs Manual, Chapter 8 Temporary Traffic Measures and Signs for Roadworks’. The CTMP will be consulted upon with the road authority and will include measures to minimise the impacts associated with the Construction Phase upon the peak periods of the day. It will include imbedded mitigation measures which will assist to alleviate any negative impact as a result of the Construction Phase of the Proposed Scheme. The appointed contractor will also prepare a Construction Stage Mobility Management Plan (CSMMP) which will be developed prior to construction, as described in the CEMP, to actively encourage personnel to travel to site by sustainable means.

No further mitigation measures are therefore required to be considered as part of the Proposed Scheme.”

Section 6.5.2 Operational Phase of Chapter 6 Traffic and Transport of Volume 2 of the EIAR outlines the following regarding the mitigation for the traffic impact:

“Given that the Proposed Scheme results in a positive impact for walking, cycling, bus and people movements, mitigation and monitoring measures have not been considered for these assessments.”

3. Boundary Treatment

Chapter 4 Proposed Scheme Description of the EIAR provides details on accommodation works and boundary treatments for the Proposed Scheme and confirms that boundary treatment works are to be replaced on a ‘like for like’ basis.

Section 4.6.18.1 ‘Summary of Accommodation Works and Boundary Treatment’ states the following:

“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, unless a section of street can benefit from urban improvement appropriate to the area.”

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.

4. Driveway access and parking

At 137 Navan Road, the permanent acquisition will result in the loss of approximately 1.0m width with an additional 2.0m temporarily required to allow for the construction of boundary treatment works and tie-in to the existing garden/driveway. The edge of the proposed bus lane generally coincides with the existing edge of carriageway. A portion of the existing boundary coinciding with the entrance pillars will be realigned, and the entrance pillars will be at least 8.1m from the front of the house. It is believed that this should not hinder the availability of parking in the driveway.

At 139 Navan Road, the permanent acquisition will result in the loss of approximately 1.0m width with an additional 2.0m temporarily required to allow for the construction of boundary treatment works and tying into the existing garden/driveway. The edge of the proposed bus lane generally coincides with the existing edge of carriageway. The 8.4m long front boundary wall, including pillars and entrance between the pillars will be at least 9.2m from the front of the house. It is believed that this this should not hinder the availability of parking in the driveway.

As noted in section 5.5.3.2 Parking and Access of Chapter 5 Construction of Volume 2 of the EIAR:

“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. Details regarding temporary access provisions will be discussed with residents and business owners 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.”

5. Services and utilities

As set out in section 19.5.1.1 of Chapter 19 of Volume 2 of the EIAR:

“all possible precautions will be taken by the appointed contractor to avoid unplanned interruptions to any services during the Construction Phase of the Proposed Scheme. This will include appropriate investigation by the appointed contractor to identify the precise location of all utility infrastructure within the working areas prior to the commencement of excavation works.

Where works are required in and around known utility infrastructure, precautions will be implemented by the appointed contractor to protect the infrastructure from damage, in accordance with best practice methodologies and the requirements of the utility companies, where practicable. Protection measures during construction will include warning signs and markings indicating the location of utility infrastructure, safe digging techniques in the vicinity of known utilities, and in certain circumstances where possible, isolation of the section of infrastructure during works in the immediate vicinity.”

Regarding unavoidable disruptions to utilities and service infrastructure, section 19.5.1.1 of Chapter 19 outlines that works will be carefully planned in consultation with each utility provider, interruptions will be time-bound so far as is reasonably practicable in order to minimise service disruption and prior notification issued to impact properties.

“Where diversions, or modifications, are required to utility infrastructure (as listed in Section 19.4.3), service interruptions and disturbance to the surrounding residential, commercial and/or community property may be unavoidable. Where this is the case, it will be planned by the appointed contractor in consultation with each utility provider, as relevant. Required service interruptions will generally only occur for a set period of time per day (a set number of hours not exceeding eight hours where reasonably practicable), and will generally not be continuous for full days at a time. Prior notification will be given to all impacted properties. This notification will include information on when interruptions and works are scheduled to occur and the duration of such interruption. Any required works will be carefully planned by the appointed contractor to ensure that the duration of interruption is minimised in so far as is practicable.”

6. Insufficient drawing information

Volume 3 of the EIAR includes 19 sets of drawings which provides information on the major elements of the scheme design and includes General Arrangement Drawings detailing the Proposed Scheme layout, Mainline Plan and Profile Drawings showing a long-section of the Proposed Scheme and Cross Section Drawings detailing cross sections obtained reflecting the general arrangement design.

3.2.24 CPO-25 – PPRD Management Company (Phoenix Park Residential Development)

Lands are being temporarily acquired at the entrance to Phoenix Park residential development along the R147 Navan Road.

3.2.24.1 Description of the Proposed Scheme at this location

In order to achieve the Proposed Scheme objectives along this section of the corridor on the R147 Navan Road, as described in section 4.5.3.1 of Chapter 4 of Volume 2 of the EIAR, the Proposed Scheme will generally consist of a bus lane and general traffic lane in each direction, with a two-way cycle track alongside the proposed outbound bus lane. A footpath will be provided north and south of the carriageway. Permanent and temporary land take will be required from a number of properties.

A signalised junction will be provided along the R147 Navan Road at the location of Phoenix Park Avenue and Phoenix Industrial Estate, with an associated right-turn pocket provided for inbound vehicles turning right into Phoenix Park Avenue.

Toucan crossings are also proposed to safely accommodate vulnerable road users through the junction. This replaces the existing left in / left out junction arrangement and ensures all movements are facilitated safely. A series of bus stops will be provided in the vicinity of the signalised junction.

The existing road cross section in this location consists of a dual carriageway layout with the two-lane outbound carriageway separated from the two-way inbound carriageway by a median and vehicle restraint system.

Left-in left-out only accesses are provided to the Phoenix Park residential development (on the outbound carriageway) and Phoenix Industrial Estate (on the inbound carriageway). A footpath is provided in the outbound direction. Along the inbound carriageway a footpath is provided from Phoenix Park retail park to Ashtown Roundabout. Between Phoenix Park Avenue and Auburn Avenue, the opposing carriageways are separated by a median.

Lands at this location are required to be permanently acquired to facilitate construction of the upgraded Phoenix Park Avenue junction and facilitate tie-in of the existing access to the residential development. The area of land to be permanently acquired is approximately 210m² (6.5m of the access area). Additional temporary land take, 456m² in area, is also required to facilitate construction and regrade works.

The relevant extract from the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description is shown in Figure 3.2.73, the existing aerial view in Figure 3.2.74, and existing street view in Figure 3.2.75.

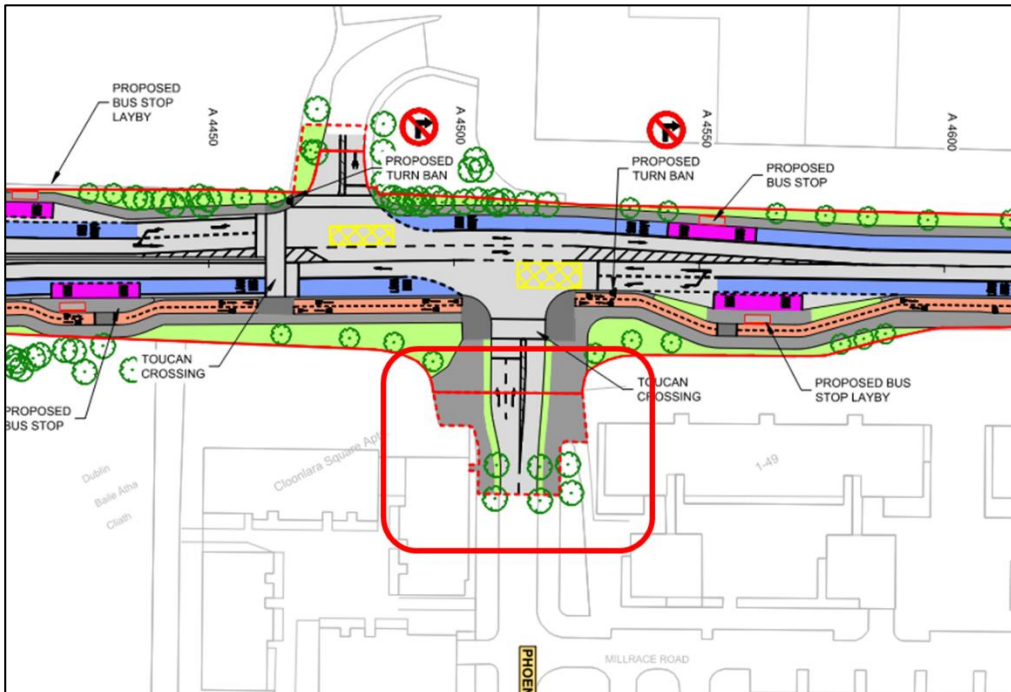


Figure 3.2.73: Proposed new Layout at Phoenix Park Avenue



Figure 3.2.74: Existing aerial view at Phoenix Park Avenue (Image Source: Google)



Figure 3.2.75: Existing Street View at Phoenix Park Avenue (Image Source: Google)

3.2.24.2 Summary of Observations Raised

The submission has been received from Wyse Property Management acting on behalf of PPRD Management Company CLG, the owner's management company of the land at Phoenix Park Racecourse.

It is noted that the submission did not object to the Proposed Scheme but raised a number of points for consideration.

1. Compensation

The submission outlined that, in the event of approval for the scheme, adequate compensation should be made payable to the landowners for both the permanent acquisition of land and the impact of temporary acquisition for the duration of construction.

2. Existing services and infrastructure

The submission stated that the works should have no impact on existing services.

3. Noise and vibration

4. Air quality

5. Working hours

The submission raised concerns over the stated working hours in the EIAR and suggested that 11pm is excessive and would impact on the existing residents. The submission requested an earlier finish time for parts of the scheme close to residential developments.

6. Parking

The submission raised concerns about residents and consumers competing with construction workers for parking. The submission stated that a Construction Stage Mobility Management Plan should be prepared with measures implemented to ensure construction workers are discouraged from using private vehicles.

7. Access during construction

The submission requested assurances that access will be maintained throughout the construction phase for residents and visitors.

8. Signalised junction

The submission welcomed the proposed signalised junction and requested that vehicles avail of a flashing amber light which would facilitate left-turning traffic to proceed with caution at any time, subject to oncoming traffic.

9. Bus stops

The submission welcomed the enhancements of the cycle track provisions and requested that ‘look left’ and ‘look right’ signage is added at the bus stop layouts to minimise conflict between pedestrians and cyclists.

10. Speed Limit

The submission welcomed the proposed speed limits along the R147 Navan Road.

11. Landscaping (Boundary Treatment)

The submission requested suitable landscaping be provided along the frontage of Phoenix Park Racecourse to ensure a pleasant environment.

12. Removal of Ashtown Roundabout

3.2.24.3 Response to Observations Raised

Detailed responses to the issues raised in points 3, 4 and 12 of this submission are provided in section 2.2.3 of this report.

1. 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 its agent/valuer in preparing, negotiating, and advising on compensation.

2. Existing services and infrastructure

As set out in section 19.5.1.1 of Chapter 19 of Volume 2 of the EIAR:

“all possible precautions will be taken by the appointed contractor to avoid unplanned interruptions to any services during the Construction Phase of the Proposed Scheme. This will include appropriate investigation by the appointed contractor to identify the precise location of all utility infrastructure within the working areas prior to the commencement of excavation works. Where works are required in and around known utility infrastructure, precautions will be implemented by the appointed contractor to protect the infrastructure from damage, in accordance with best practice methodologies and the requirements of the utility companies, where practicable. Protection measures during construction will include warning signs and markings indicating the location of utility infrastructure, safe digging techniques in the vicinity of known utilities, and in certain circumstances where possible, isolation of the section of infrastructure during works in the immediate vicinity.”

Regarding unavoidable disruptions to utilities and service infrastructure, section 19.5.1.1 of the EIAR outlines that works will be carefully planned in consultation with each utility provider, interruptions will be time-bound so far as is reasonably practical in order to minimise service disruption and prior notification issued to impact properties.

“Where diversions, or modifications, are required to utility infrastructure (as listed in Section 19.4.3), service interruptions and disturbance to the surrounding residential, commercial and/or community property may be unavoidable. Where this is the case, it will be planned by the appointed contractor in consultation with each utility provider, as relevant. Required service interruptions will generally only occur for a set period of time per day (a set number of hours not exceeding eight hours where reasonably practicable), and will generally not be continuous for full days at a time. Prior notification will be given to all impacted properties. This notification will include information on when interruptions and works are scheduled to occur and the duration of such interruption. Any required works will be carefully planned by the appointed contractor to ensure that the duration of interruption is minimised in so far as is practicable.”

5. Working Hours

Chapter 5 Construction of Volume 2 of the EIAR outlines the general working hours. While section 5.10.3 sets out that general construction working hours on weekdays are between 07:00 and 23:00, the planning and management of activities will take due consideration of sensitive receptors, in particular nearby residential areas.

Section 5.10.3 'Working Hours' states:

"It is envisaged that generally construction working hours will be between 07:00hrs and 23:00hrs on weekdays, and between 08:00hrs and 16:30hrs on Saturdays. Night-time and Sunday working will be required during certain periods to facilitate street works that cannot be undertaken under day-time / evening-time conditions. The planning of such works will take due consideration of sensitive receptors, in particular any nearby residential areas."

6. Parking

As noted in Chapter 5 Construction of the EIAR, a Construction Environmental Management Plan (CEMP) has been prepared and is included as Appendix A5.1 in Volume 4 of the EIAR. As outlined in the CEMP, the appointed contractor will be required to prepare a Construction Stage Mobility Management Plan (CSMMP) to actively discourage personnel from using private vehicles to travel to the Proposed Scheme and promote travel by sustainable means. Details of the CSMMP are outlined in section 5.2.3.8 of the CEMP. However, section 5.2.2.4.2 provides a summary regarding journeys by construction personnel to and from the Proposed Scheme:

"The appointed contractor will prepare a Construction Stage Mobility Management Plan (CSMMP) to actively discourage personnel from using private vehicles to travel to the Proposed Scheme. The CSMMP will promote the use of public transport, cycling and walking by personnel. Private parking at the Construction Compounds will be limited. Vehicle-sharing will be encouraged, subject to public health guidelines, where travel by private vehicle is a necessity (e.g. for transporting heavy equipment)."

7. Access during construction

Chapter 5 Construction of the EIAR describes details of the construction activities associated with the Proposed Scheme.

Section 5.1 outlines that a competent contractor will be appointed to carry out the scheme works and present details of the temporary traffic management measures, including the staging measures to be carried out to facilitate how the vehicles, cyclists and pedestrians will be impacted and safely catered for, during the works.

The roads and streets along the Proposed Scheme will remain open to general traffic wherever practicable during the Construction Phase. Works will be constructed ensuring disturbances to residents, businesses and road users are minimised while maintaining the flow of all modes of traffic along the route wherever practicable. However, lane closures, road closures and diversions will be necessary to facilitate construction.

Section 5.5.3.1 of Chapter 5 states:

"The Proposed Scheme will be constructed in a manner which will minimise, as much as practicable, any disturbance to residents, businesses and road users. Road and street upgrade works will be completed in a Staged manner, as described in section 5.8.3, whereby traffic of all modes will be managed to ensure construction can continue while ensuring the safety of all road users, and personnel, and maintaining flow of all modes of traffic wherever practicable."

As noted in section 5.5.3.2 Parking and 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."

Details regarding temporary access provisions will be discussed with residents and business owners 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.”

8. Signalised junction

As stated in Chapter 1 Introduction of the EIAR one of the scheme objectives is 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. In addition to the public transport network enhancements, the Proposed Scheme will provide significant benefits for cyclists and pedestrians.

As noted in Appendix A6.3 Junction Design Report of Volume 4 of the EIAR:

“The Phoenix Park Avenue staggered junction with the access to Ashtown Business Centre is proposed to be signalised (instead of the present left-in / left-out junction). Signalisation will allow right turns out of the side roads, and in to Phoenix Park Avenue, but will prevent right-turn movements into the Ashtown Business Centre access road from Navan Road. Bus lanes will be provided on both Navan Road approaches and will be curtailed 20m from the junction. Cycle facilities will be provided via a two-way cycle track to the south of Navan Road.

Signal Operation

A four stage signal operation is proposed. Mainline traffic and buses will operate in the same stage, with left turning vehicles crossing the bus lane path at a distance of 20m from the junction. This will maximise green time for buses and minimise delay. The side roads will operate separately in their own stages. The pedestrian crossings will operate in their own stage.”

This proposed junction arrangement is deemed to maximise the overall operational efficiency and safety of the junction in line with the scheme objectives.

9. Bus stops

The NTA welcomes the support for the proposed enhancements to cycling facilities along the R147 Navan Road. A detailed response to the issues raised in point 9 of this submission is provided in section 2.2.3 of this report.

10. Speed Limit

The NTA welcomes the support for the proposed speed limits to be implemented along the R147 Navan Road.

11. Landscaping (Boundary Treatment)

Chapter 4 Proposed Scheme Description of Volume 2 of the EIAR provides details on accommodation works and boundary treatments for the Proposed Scheme and confirms that boundary treatment works are to be replaced on a ‘like for like’ basis.

Section 4.6.18.1 ‘Summary of Accommodation Works and Boundary Treatment’ states the following:

“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, unless a section of street can benefit from urban improvement appropriate to the area.”

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.

3.2.25 CPO-26 – Primary Healthcare Properties (Aras Slainte, Navan Road)

3.2.25.1 Description of the Proposed Scheme at this location

In order to achieve the Proposed Scheme objectives along this section of the corridor on the R147 Navan Road, as described in section 4.5.4.1 of Chapter 4 of Volume 2 of the EIAR, the Proposed Scheme will generally consist of a bus lane and general traffic lane in each direction, with one-way cycle tracks alongside the proposed inbound and outbound bus lanes, each adjacent to a footpath. Permanent and temporary land take will be required from a number of properties, with the majority being residential.

At the location of Aras Slainte, a right turn pocket is proposed similar to the existing provision and outbound and inbound in-line shared bus stop landing zones will be provided at this location.

The existing road cross section in this location consists of a footpath and an on-road cycle-lane, one general traffic lane in each direction and one bus lane on the inbound carriageway. The opposing traffic lanes are separated by a right-turn pocket. Existing inbound and outbound bus stops are also located to the west of the property.

At this property the width of land to be temporarily acquired ranges between 2.5m and 3.0m. This will facilitate construction of the Proposed Scheme and allow for regrading of the existing access to ensure appropriate tie-in.

The relevant extract from the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description is shown in Figure 3.2.76, the existing aerial view in Figure 3.2.77, and existing street view in Figure 3.2.78.

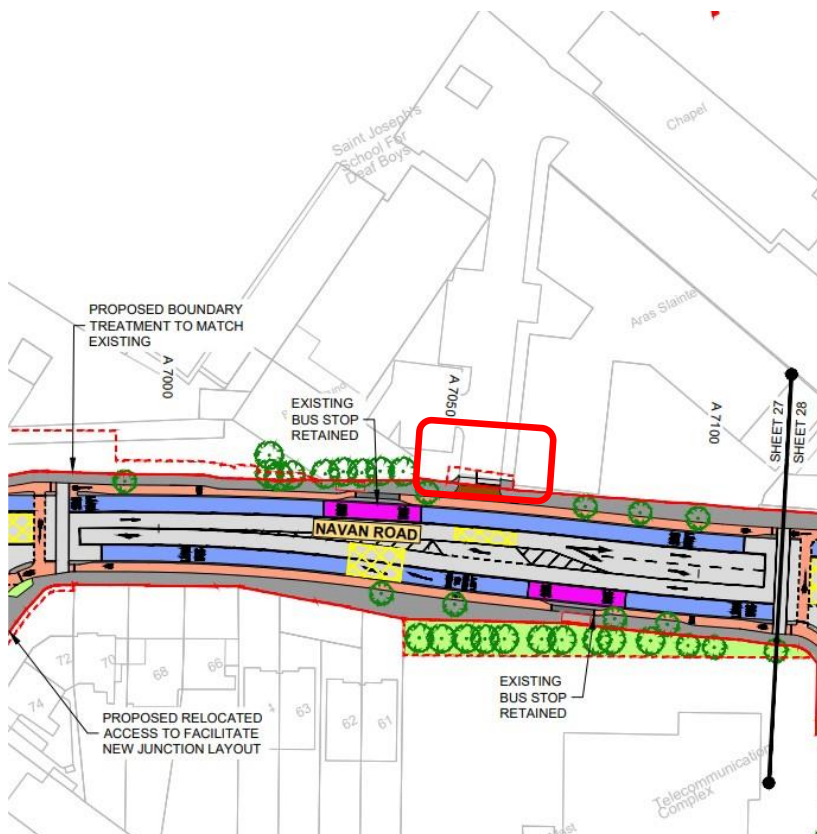


Figure 3.2.76: Proposed new Layout at Aras Slainte, Navan Road



Figure 3.2.77: Existing aerial view at Aras Slainte, Navan Road (Image Source: Google)



Figure 3.2.78: Existing Street View at Aras Slainte, Navan Road (Image Source: Google)

3.2.25.2 Summary of Observations Raised

It is noted that this submission did not raise an objection to the scheme however the following queries were raised in light of the proposals.

1. Construction timeline

The submission requested details of start and finish date for the proposed works.

2. Access & egress for vehicles and pedestrians

The submission requested that a guarantee is given to maintain safe vehicular and pedestrian access and egress during construction.

3. Reinstatement provisions

The submission requested clarity on the reinstatement provisions.

3.2.25.3 Response to Observations Raised

1. Construction timeline

The start date for the Proposed Scheme is dependent on the timing of any approval from An Bord Pleanála, should they grant planning permission, to proceed with the scheme.

Chapter 5 of Volume 2 of the EIAR describes the construction activities associated with the Proposed Scheme. Section 5.4 states that the total Construction Phase duration for the overall Proposed Scheme is estimated at approximately 24 months. However, construction activities in individual sections will have shorter durations as outlined in overview of construction works presented section 5.3.

The programme identifies the approximate duration of works at each section. The location of each section / sub-section along the Proposed Scheme is shown in Figure 5.1 in Volume 3 of this EIAR.

For specific construction activities along the Navan Road in the vicinity of Aras Slainte (section 4c), section 5.3.4.3 of Chapter 5 of the EIAR gives a brief overview of the construction works to be undertaken:

“Section 4c encompasses a length of approximately 750m along Navan Road and Old Cabra Road, between Skreen Road Junction and the railway line crossing below Old Cabra Road. The construction activities at Section 4c will comprise widening, reconstruction, and resurfacing of the roads, footpaths, and cycle tracks, and new kerbs. Construction activities will also consist of additional signage, new road markings, new and amended traffic signal infrastructure, new street furniture and landscaping works. Boundary walls will be relocated at discrete sections along Navan Road. Some minor utility diversions and / or protections will be required. Trees will be removed at multiple locations along Navan Road and Old Cabra Road. The expected construction duration will be approximately six months.”

2. Access & egress for vehicles and pedestrians

Chapter 5 Construction of Volume 2 of the EIAR describes details of the construction activities associated with the Proposed Scheme. Section 5.1 affirms that a competent contractor will be appointed to carry out the scheme works and presents details of the temporary traffic management measures, including the staging measures to be carried out to facilitate how the vehicles, cyclists and pedestrians will be impacted and safely catered for, during the works.

Section 5.8 of Chapter 5 of the EIAR gives further details on the traffic management measures developed for construction of the scheme. For pedestrians and cyclists it states the following:

“the measures set out in section 8.2.8 of the Traffic Signs Manual will be implemented, wherever practicable, to ensure the safety of all road users, in particular pedestrians and cyclists. Therefore, where footpaths or off-road cycle tracks are affected by construction, a safe route will be provided past the works area.”

The roads and streets along the Proposed Scheme will remain open to general traffic wherever practicable during the Construction Phase. Works will be constructed ensuring disturbances to residents, businesses and road users are minimised while maintaining the flow of all modes of traffic along the route wherever practicable. However, lane closures, road closures and diversions will be necessary to facilitate construction.

Section 5.5.3.1 of Chapter 5 states:

“The Proposed Scheme will be constructed in a manner which will minimise, as much as practicable, any disturbance to residents, businesses and road users. Road and street upgrade works will be completed in a Staged manner, as described in section 5.8.3, whereby traffic of all modes will be managed to ensure construction can continue while ensuring the safety of all road users, and personnel, and maintaining flow of all modes of traffic wherever practicable.”

As noted in section 5.5.3.2 ‘Parking and 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. Details regarding temporary access provisions will be discussed with residents and business owners 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.”

3. Reinstatement provisions

Chapter 4 Proposed Scheme Description of the EIAR provides details on accommodation works and boundary treatments for the Proposed Scheme and confirms that boundary treatment works are to be replaced on a ‘like for like’ basis.

Section 4.6.18.1 Summary of Accommodation Works and Boundary Treatment states the following:

“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, unless a section of street can benefit from urban improvement appropriate to the area.”

The width of land to be temporarily acquired ranges between 2.5m and 3.0m. This will facilitate construction of the Proposed Scheme and allow for regrading of the existing access to ensure appropriate tie-in.

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.

3.2.26 CPO-27 – Clare Rudden and Richard Kinsella (269 Navan Road)

3.2.26.1 Description of the Proposed Scheme at this location

In order to achieve the Proposed Scheme objectives along this section of the corridor on the R147 Navan Road, as described in section 4.5.4.1 of Chapter 4 of Volume 2 of the EIAR, the Proposed Scheme will generally consist of a bus lane and general traffic lane in each direction, with one-way cycle tracks alongside the proposed inbound and outbound bus lanes, each adjacent to a footpath. The inbound bus lane terminates 20m in advance of the Kinvara Avenue Junction to facilitate left-turning traffic. Permanent and temporary land take will be required from a number of properties, with the majority being residential.

The existing road cross section in this location consists of a footpath and an on-road cycle-lane, one general traffic lane and one bus lane in each direction.

At this property the width of land to be permanently acquired ranges between 2.4m and 2.6m. This will require the relocation of the existing boundary wall and any adjacent vegetation.

The relevant extract from the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description is shown in Figure 3.2.79, the existing aerial view in Figure 3.2.80, and existing street view in Figure 3.2.81.

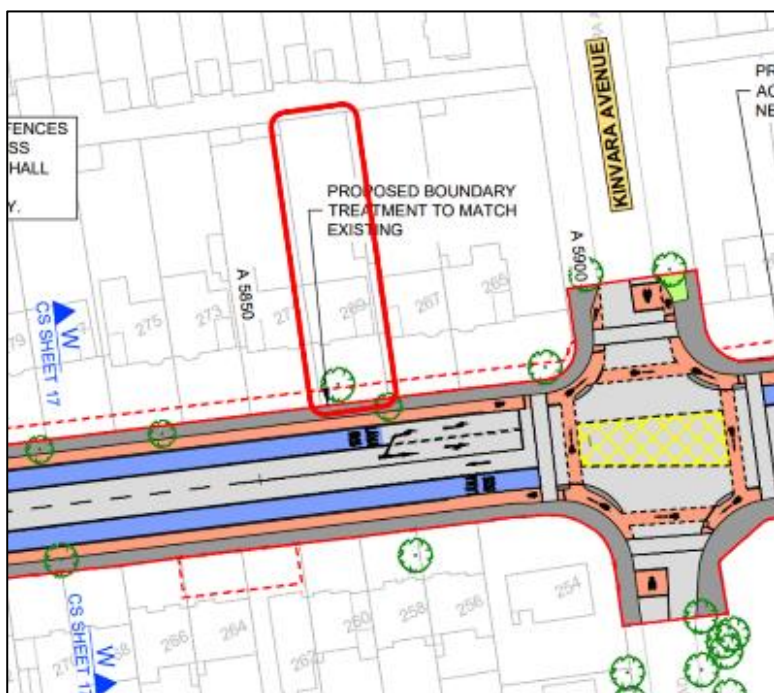


Figure 3.2.79: Proposed new Layout at 269 Navan Road



Figure 3.2.80: Existing aerial view at 269 Navan Road (Image Source: Google)



Figure 3.2.81: Existing Street View at 269 Navan Road (Image Source: Google)

3.2.26.2 Summary of Observations Raised

This submission objected to the scheme, requested an oral hearing, and raised concerns with aspects of the proposed Core Bus Corridor along the Navan Road and surrounding communities.

It is noted that the submission also supported improvements to transport infrastructure.

1. Proximity of bus and cycle lanes

The submission stated that the proposals will result in a reduced offset in the order of 2.5m of bus and cycle lanes to the property. As parents of young children, the submission stated that this is a major concern.

2. Loss of parking and driveway space

The submission stated that parking in the driveway is required for a work van, trailer and necessary equipment. As a result of the reduction in driveway space, rental of a storage unit will be required at a considerable cost. Additionally, the submission noted there will be less space to manoeuvre vehicles within the driveway and will require the occupants to reverse onto the busy road.

3. Impact on property value

The submission stated that land take of 26.4m² will affect the value of the property.

4. Removal and provision of trees

5. Noise and vibration
6. Bus stops
7. Old Cabra Road Bus Gates (Increased traffic on side roads)

3.2.26.3 *Response to Observations Raised*

Detailed responses to the issues raised in points 3 to 7 of this submission are provided in sections 2.2.3 and 2.3.3 of this report.

1. Proximity of bus and cycle lanes

The edge of the proposed nearest bus lane will be 1.0m closer to the residence than the kerb of the existing general traffic lane. Additionally, the provision of the segregated cycle track will result in an offset to the cycle track of 2.0m. As noted in the scheme description, a 2.0m wide footpath separates the property boundary from the proposed cycle track. The boundary wall at the front of the property will be at least 9.1m from the front of the house.

As noted in section 4.6.11.5.3 of Chapter 4 Proposed Scheme Description of Volume 2 of the EIAR, reinstatement of property frontage including boundary walls, gates, railings driveway, footpath and landscaping will be on a like-for-like basis.

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. The reinstatement of the boundary treatment will ensure a physical barrier is provided between the Proposed Scheme and the property, on a 'like for like' basis.

2. Loss of parking and driveway space

As noted in section 5.5.3.2 Parking and Access of Chapter 5 Construction of Volume 2 of the EIAR:

“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. Details regarding temporary access provisions will be discussed with residents and business owners 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.”

However, access to your driveway for parking may be temporarily restricted in order to accommodate the boundary treatment and driveway regrading works in the vicinity of your property.

The permanent acquisition will result in the loss of approximately 2.5m to 2.6m of the driveway / garden with an additional 2.5m temporarily required to allow for the construction of boundary treatment works and tying into the existing garden/driveway. The edge of the proposed nearest bus lane will be 1.0m closer to the residence than the kerb of the existing general traffic lane. The front boundary wall will be at least 9.1m from the front of the house. It is believed that this would not introduce any additional risk to the owners during the operation of the Proposed Scheme with access and egress to/from the property achieved similar the current scenario. It is believed that this this should not hinder the availability of parking in the driveway.

It is noted that the submission provides detail on the likely usage of the driveway which is required to facilitate access for a work van and trailer while also storing equipment. We are unable to determine the typical storage requirements and the particulars of the van/trailer combination in use, which is anticipated to be more onerous than that of a standard private car. The reduction in driveway area may impact on this intended usage.

3.2.27.1 Description of the Proposed Scheme at this location

In order to achieve the Proposed Scheme objectives along this section of the corridor on the R147 Navan Road, as described in section 4.5.4.1 of Chapter 4 of Volume 2 of the EIAR, the Proposed Scheme will generally consist of a bus lane and general traffic lane in each direction, with one-way cycle tracks alongside the proposed inbound and outbound bus lanes, each adjacent to a footpath. The inbound bus lane terminates 20m in advance of the Kinvara Avenue Junction to facilitate left-turning traffic. Permanent and temporary land take will be required from a number of properties, with the majority being residential.

The existing road cross section in this location consists of a footpath and an on-road cycle-lane on each side, along with two inbound general traffic lanes and one outbound general traffic lane.

At this property the width of land to be permanently acquired ranges between 2.6m and 3.0m. This will require the relocation of the existing boundary wall and any adjacent vegetation.

The relevant extract from the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description is shown in Figure 3.2.82, the existing aerial view in Figure 3.2.83, and existing street view in Figure 3.2.84.

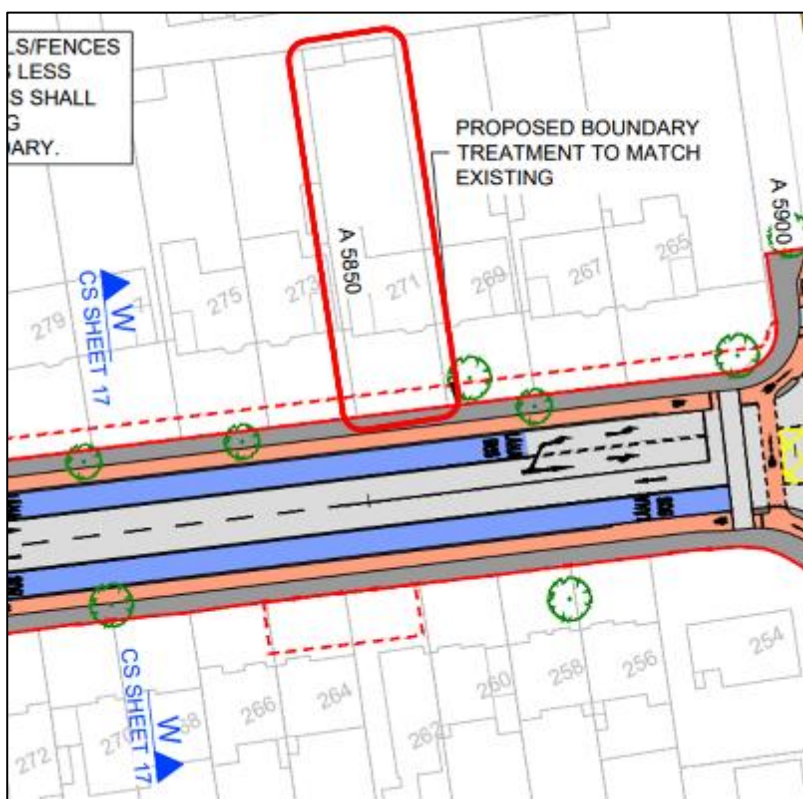


Figure 3.2.82: Proposed new Layout at 271 Navan Road



Figure 3.2.83: Existing aerial view at 271 Navan Road (Image Source: Google)



Figure 3.2.84: Existing Street View at 271 Navan Road (Image Source: Google)

3.2.27.2 *Summary of Observations Raised*

This submission objected to CPO for the reasons summarised in the following section and requested an oral hearing.

1. Safety

The submission stated that safety of the occupants will be endangered through the proposed reduction in garden space to the front of the property and secondly due to a significant increase in vehicle usage of the Navan Road.

2. Access and Parking

The submission stated that there is a lack of detail surrounding access and consideration of parking at the property. Regarding reversing manoeuvres, the submission outlined Road Traffic (Traffic and Parking) Regulations, 1997, Article 12 and affirmed that the occupants should not have to contravene this in order to use their driveway due to the Core Bus Corridor proposals.

3. Lack of detail on boundary treatment

4. CPO schedule lack of clarity

The submission raised concern over a lack of clarity in the CPO including timelines of the CPO and temporary CPO. Additionally, the submission raised concerns regarding safety, access and parking concerns.

5. Removal and provision of trees

6. Alternative Route Options

7. Community

The submission stated that the existing Navan Road is considered a community however the introduction of the Core Bus Corridor proposals will change the character of the area to more of a traffic corridor with a four/five lane carriageway which isn't conducive to family and community life. The submission also stated that a major draw in residing along the Navan Road is the proximity and safe access to local amenities and the ability to walk with children, reducing dependency on cars.

8. Road Safety

3.2.27.3 *Response to Observations Raised*

Detailed responses to the issues raised in point 5,6 and 8 of this submission are provided in section 2.2.3 of this report.

1. Safety

The permanent acquisition will result in the maximum loss of 3.0m of the driveway entrance/garden area with an additional 2.5m temporarily required to allow for the construction of boundary treatment works and tying into the existing garden/driveway. The edge of the proposed bus lane will be 1.3m closer to the residence than the kerb of the existing general traffic lane. The 10.6m long front boundary wall, including gate and entrance pillars will be at least 8.9m from the front of the house. Additionally, the provision of the segregated cycle track will result in an offset from the property boundary to the cycle track of 2.0m. As noted in the scheme description in Chapter 4 of Volume 2 of the EIAR, a 2.0m wide footpath separates the property boundary from the proposed cycle track.

As noted in Chapter 4 'Proposed Scheme Description' of the EIAR, reinstatement of property frontage including boundary walls, gates, railings driveway, footpath and landscaping will be on a like-for-like basis.

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.

The reinstatement of the boundary treatment will ensure a physical barrier is provided between the Proposed Scheme and the property, on a 'like for like' basis.

With reference to the concerns raised regarding an increase to vehicle usage of the Navan Road, Chapter 6 'Traffic and Transport' of the EIAR outlines the results of the traffic assessment along this section of the route, and specifically section 6.4.6.3 'Operational Phase Summary', where it has been determined that there will be a positive, significant and long-term reduction in general traffic flows along the proposed scheme.

“Overall, it has been determined that the impact of the reduction in general traffic flows along the Proposed Scheme will be Positive, Significant and Long-term whilst the impact of the redistributed general traffic along the surrounding road network will be Negative, Slight and Long-term. Thus, overall, there will be no significant deterioration in the general traffic environment in the study area as a consequence of meeting the scheme objectives of providing enhanced sustainable mode priority along the direct study area.”

Additional information on traffic impact is given in section 2.2.3.5 of this report.

In terms of safety, Safety Audits have been undertaken for the Proposed Scheme and are included as Appendix M of the Preliminary Design Report provided in the Supplementary Information. These audits did not highlight any safety concerns with the proposed arrangement.

2. Access and Parking

It is assumed that the submission is referring to access and parking arrangements post-completion of the Proposed Scheme.

The permanent acquisition will result in the loss of approximately 3.0m to the driveway/garden with an additional 2.5m temporarily required to allow for the construction of boundary treatment works and tying into the existing garden/driveway. The edge of the proposed bus lane will be 1.3m closer to the residence than the kerb of the existing general traffic lane. The 10.6m long front boundary wall, including gate and entrance pillars will be at least 8.9m from the front of the house. It is believed that this would not introduce any additional risk to the owners during the operation of the Proposed Scheme and that this should not hinder the availability of parking in the driveway.

The principle of how residents can access/egress their property is unchanged by the scheme proposals. The proposed access/egress scenario is similar to the existing with the requirement for a vehicle to be driven across a cycle lane/cycle track and footpath. The objection notes that the residents should not be forced to contravene a road traffic order. 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.

In addition, as noted in Appendix M2 Stage 1 Road Safety Audit of the Preliminary Design Report:

“The scheme has been examined and this report compiled in respect of the consideration of those matters that have an adverse effect on road safety and considers the perspective of all road users.”

All recommended measures or alternative measures proposed by the Designer were accepted by the Road Safety Audit Team.

3. Lack of detail on boundary treatment

Chapter 4 Proposed Scheme Description of Volume 2 of the EIAR provides details on accommodation works and boundary treatments for the Proposed Scheme and confirms that boundary treatment works are to be replaced on a 'like for like' basis.

Section 4.6.18.1 ‘Summary of Accommodation Works and Boundary Treatment’ states the following:

“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, unless a section of street can benefit from urban improvement appropriate to the area.”

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.

4. CPO schedule lack of clarity

As noted previously, the permanent acquisition will result in the loss of a strip of land to the front of the property, a maximum width of approximately 3.0m which includes the driveway and garden area. This equates to an area of 29.1m². An additional strip of land beyond the permanent CPO is required, 2.5m in width equating to an area of 25.4m², temporarily to allow for the construction of boundary treatment works and tying into the existing garden/driveway.

With respect to parking and access, as noted in section 5.5.3.2 Parking and Access of Chapter 5 Construction of Volume 2 of the EIAR:

“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. Details regarding temporary access provisions will be discussed with residents and business owners 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.”

However, access to the driveway for parking may be temporarily restricted in order to accommodate the boundary treatment and driveway regrading works in the vicinity of the property.

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.

7. Community

Chapter 10 Population of the EIAR considered the potential community and economic impacts on the human population associated with the Construction and Operational Phases of the Blanchardstown to City Centre Core Bus Corridor Scheme.

“These potential impacts can affect the way in which people live, work, relate to one another, organise to meet their needs and generally operate as members of society. This population assessment considers both social impacts on communities (community assessment) as well as economic impacts on commercial businesses (economic assessment). The assessment also considers the ways in which the Proposed Scheme will improve walking, cycling and bus facilities and is anticipated to encourage sustainable modes of transport, therefore reducing the demand for private vehicles / parking along the Proposed Scheme.”

Community amenity impacts arise from a combination of traffic, air quality, noise and visual impacts and are discussed further in Section 10.2.4.1.1 of the EIAR. The assessment of community land take during the operational phase assesses the impact of permanent land take acquisition on community facilities and residential properties. Community accessibility relates to the ability of users to access community facilities, recreational resources and residential properties. The nature of the Proposed Scheme means that accessibility impacts will differ based on the mode of travel used. The assessment has therefore separately assessed accessibility impacts on pedestrians, cyclists, bus users and private vehicles.

Section 10.4.4 ‘Operational Phase’ and Table 10.13 summarises the potential impacts (same as residual impacts) of the population assessment during the Operation Phase of the Proposed Scheme. Specifically in relation to the Navan Road, the following predicted impacts are outlined in Table 3.2.3 below.

Table 3.2.3: Summary of impacts of land take on the community along Navan Road

Assessment Topic	Predicted Impact (Residual Impacts) for Community Areas
Community amenity	Negative, Not Significant and Long-Term
Community land take	Negative, Not Significant and Short-Term
Community accessibility	Pedestrians Positive, Moderate to Very Significant and Long-Term Cyclists Positive, Slight to Very Significant and Long-Term Bus Users Positive, Moderate to Profound and Long-Term Private Vehicles Positive, Significant and Long-Term

3.2.28 CPO-29 – Tesco Ireland Limited (Tesco, Park Shopping Centre, Prussia Street)

3.2.28.1 Description of the Proposed Scheme at this location

In order to achieve the Proposed Scheme objectives along this section of the corridor on Prussia Street, as described in section 4.5.5.1 of Chapter 4 of Volume 2 of the EIAR, the Proposed Scheme consists of a traffic lane in both directions, carrying buses and local traffic only. A short section of southbound cycle track will be provided on Prussia Street from its junction with North Circular Road before cyclists merge with general traffic just north of Park Shopping Centre. In the northbound direction, the cycle track will commence approximately 50m south of the junction with St Joseph’s Road. A footpath will be provided on both sides of the carriageway.

“On Prussia Street, between North Circular Road and the entrance to the Park Shopping Centre, the Proposed Scheme will provide:

- *One southbound general traffic lane; Environmental Impact Assessment Report (EIAR) Volume 2 of 4 Main Report Blanchardstown to City Centre Core Bus Corridor Scheme Chapter 04 Page 29*
- *One northbound ‘straight-ahead only’ lane for local traffic, taxis and buses travelling to Old Cabra Road; and*
- *One left turn lane from Prussia Street to North Circular Road; Right turn movement from Prussia Street to North Circular Road will be removed.”*

“The Proposed Scheme will limit the use of Old Cabra Road to local access traffic, buses, taxis and cyclists as follows:

- *No through traffic in the southbound direction at the northern end of Old Cabra Road (at its junction with Navan Road), except for buses, taxis and cyclists, which precludes general traffic from Navan Road travelling to Stoneybatter along Old Cabra Road;*
- *No through traffic in the northbound direction except for buses, taxis and cyclists, due to proposed introduction of a Bus Gate at the railway overbridge on the Old Cabra Road, which precludes general traffic from Stoneybatter and the North Circular Road from travelling along Old Cabra Road through to Navan Road. Local traffic in the northbound direction will have access as far as the Bus Gate.”*

At the junction of Manor Street / Prussia Street and Aughrim Street, the Proposed Scheme will provide a Bus Gate in the northbound direction located on Prussia Street just north of Aughrim Street junction, such that all northbound general traffic will be required to turn left onto Aughrim Street. In the southbound direction, a Bus Gate will be located on Prussia Street / Manor Street just south of the Aughrim Street junction and any general traffic travelling southbound on Prussia Street at this location will be required to turn right onto Aughrim Street. St Joseph's Road will be modified to include a one-way section at its eastern end (i.e. one-way in an eastbound direction). This will restrict traffic using St Joseph's Road as a means of avoiding the Bus Gate at Prussia Street / Manor Street junction.

The junction of Prussia Street and North Circular Road will be upgraded to a signalised junction to provide separate crossing facilities for cyclists and pedestrians, and to ban right turns from Prussia Street to minimise delay to buses travelling straight ahead (to Old Cabra Road).

The existing road cross section in this location consists of a one general traffic lane in each direction and a footpath on each side of the carriageway. An on-road cycle lane is provided in the northbound direction.

Permanent and temporary land take is required from the Park Shopping Centre. The maximum width of land to be permanently acquired is 2.2m. This will require modification of the existing access with the relocation of the existing boundary wall. Land will be temporarily acquired to facilitate construction of the Proposed Scheme and tie-in of the existing car park area.

The relevant extract from the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description is shown in Figure 3.2.85, the existing aerial view in Figure 3.2.86, and existing street view in Figure 3.2.87.

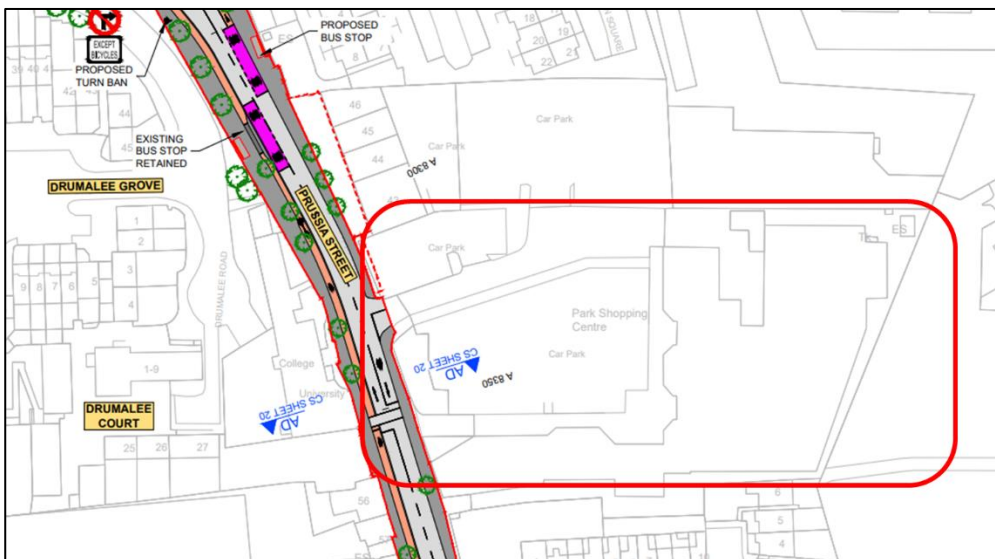


Figure 3.2.85: Proposed new Layout at Park Shopping Centre, Prussia Street



Figure 3.2.86: Existing aerial view at Park Shopping Centre, Prussia Street (Image Source: Google)



Figure 3.2.87: Existing Street View at Park Shopping Centre, Prussia Street (Image Source: Google)

3.2.28.2 Summary of Observations Raised

The submission is received from Avison Young, in conjunction with Pinnacle Consulting Engineers, on behalf of Tesco Ireland Limited.

This submission welcomed the NTA’s investment in sustainable transport to improve the urban environment of Dublin City and its suburbs. It raised the following issues:

1. Impact on Prussia Street, Manor Street and Stoneybatter

3.2.28.3 Response to Observations Raised

Detailed responses to the issues raised in this submission are provided in section 2.4.3 of this report.

3.2.29 CPO-30 – Catherine Tobin (Phoenix Park Residential Development)

Lands are being temporarily acquired at the entrance to Phoenix Park residential development along the R147 Navan Road.

3.2.29.1 Description of the Proposed Scheme at this location

In order to achieve the Proposed Scheme objectives along this section of the corridor on the R147 Navan Road, as described in section 4.5.3.1 of Chapter 4 of Volume 2 of the EIAR, the Proposed Scheme will generally consist of a bus lane and general traffic lane in each direction, with a two-way cycle track alongside the proposed outbound bus lane. A footpath will be provided north and south of the carriageway. Permanent and temporary land take will be required from a number of properties.

A signalised junction will be provided along the R147 Navan Road at the location of Phoenix Park Avenue and Phoenix Industrial Estate, with an associated right-turn pocket provided for inbound vehicles turning right into Phoenix Park Avenue.

Toucan crossings are also proposed to safely accommodate vulnerable road users through the junction. This replaces the existing left in / left out junction arrangement and ensures all movements are facilitated safely. A series of bus stops will be provided in the vicinity of the signalised junction.

The existing road cross section in this location consists of a dual carriageway layout with the two-lane outbound carriageway separated from the two-way inbound carriageway by a median and vehicle restraint system. Left-in left-out only accesses are provided to the Phoenix Park residential development (on the outbound carriageway) and Phoenix Industrial Estate (on the inbound carriageway). A footpath is provided in the outbound direction. Along the inbound carriageway a footpath is provided from Phoenix Park retail park to Ashtown Roundabout. Between Phoenix Park Avenue and Auburn Avenue, the opposing carriageways are separated by a median.

Lands at this location are required to be permanently acquired to facilitate construction of the upgraded Phoenix Park Avenue junction and facilitate tie-in of the existing access to the residential development. The area of land to be permanently acquired is approximately 210m² (6.5m of the access area). Additional temporary land take, 456m² in area, is also required to facilitate construction and regrade works.

The relevant extract from the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description is shown in Figure 3.2.88, the existing aerial view in Figure 3.2.89, and existing street view in Figure 3.2.90.

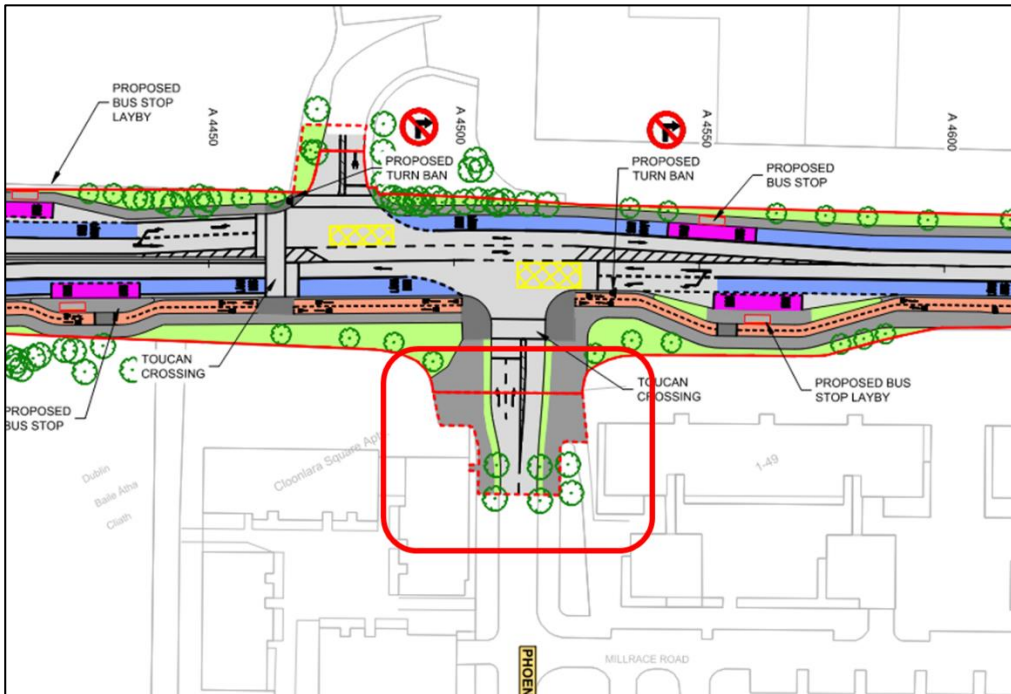


Figure 3.2.88: Proposed new Layout at Phoenix Park Avenue

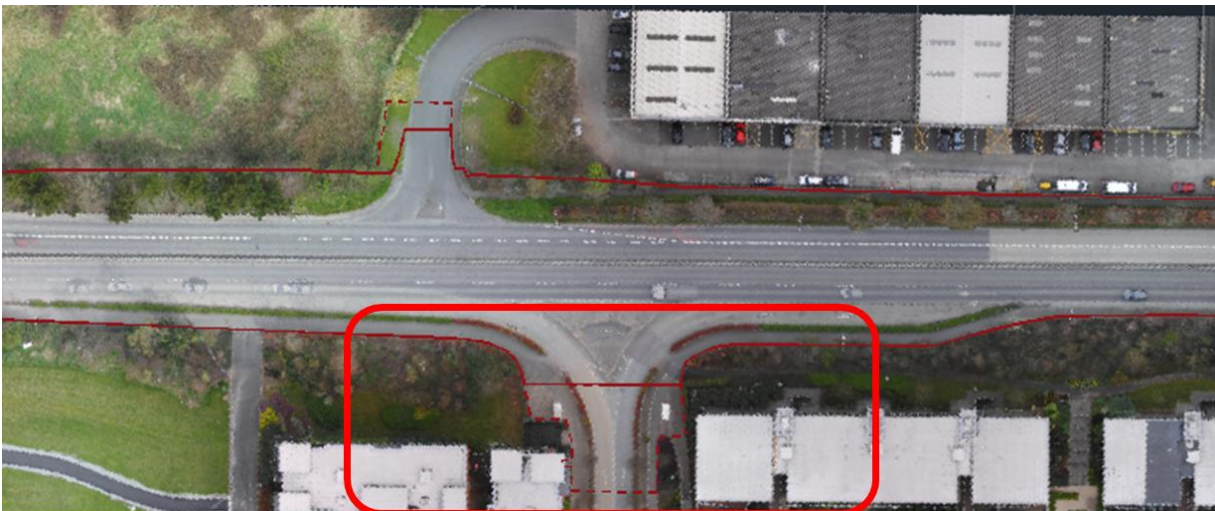


Figure 3.2.89: Existing aerial view at Phoenix Park Avenue (Image Source: Google)



Figure 3.2.90: Existing Street View at Phoenix Park Avenue (Image Source: Google)

3.2.29.2 Summary of Observations Raised

The submission supported the points raised in the Navan Road Community Council submission and raised the following observations:

1. Consultation process
2. Permanent CPO

The submission queried the requirement for permanent land take citing difficulty in understanding the proposals.

3. Removal and provision of trees

4. Removal of Ashtown Roundabout

5. Removal of median and vehicle restraint system (VRS) on R147 Navan Road.

The submission queried the removal of the VRS seeking justification considering the need for it currently.

6. Private car use

The submission raised concerns that they will be unable to use a private car to travel to services in Stoneybatter.

7. Old Cabra Road Bus Gates

3.2.29.3 Response to Observations Raised

Detailed responses to the issues raised in points 1,3,4 and 7 of this submission are provided in sections 2.2.3, 2.3.3 and 2.10.2 of this report.

2. Permanent CPO

At the entrance to Phoenix Park residential development, an area of land is required to be permanently acquired to facilitate construction of the Proposed Scheme including landscaping and tie-in of the existing access to the residential development. The area of land to be permanently acquired is approximately 210m² (6.5m of the access area). Additional temporary land take, approximately 456m² in area, is also required to facilitate construction of the regrade works at the tie-in location.

It should be noted that there is no intention to acquire any building within the Phoenix Park residential development and the buildings themselves will not be directly affected by the CPO. The details of the extents of the CPO are shown on the Compulsory Purchase Order Schedule and associated Deposit Maps.

5. Removal of median and vehicle restraint system (VRS) on R147 Navan Road.

As noted in Chapter 4 Proposed Scheme Description of the EIAR, the central median between Phoenix Park Avenue junction and Ashtown Road junction will be removed to provide additional space for footpath and cyclist facilities and landscaped verges.

Considering the urbanised environment of this section of the Core Bus Corridor, including the addition of signalised junctions and controlled pedestrian/toucan crossings, a 50km/h speed limit will be implemented between Phoenix Park Avenue junction and Ashtown Road junction. This represents a reduction in speed limit from the existing of 60km/h and is consistent with the speed limit on Navan Road east of Ashtown Road.

6. Private car use

As stated in Chapter 1 Introduction of the EIAR:

“the aim 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.”

The Proposed Scheme will greatly improve transport services for all who reside along the route of the Proposed Scheme, including on Navan Road, by providing significantly enhanced sustainable transport options.

The Proposed Scheme will 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. In order to achieve the Proposed Scheme objectives along this section of the corridor on the R147 Navan Road, as described in section 4.5.4.1 of Chapter 4 of Volume 2 of the EIAR, the Proposed Scheme will generally consist of a bus lane and general traffic lane in each direction, with one-way cycle tracks and footpaths.

While the design of the Proposed Scheme therefore involves the prioritisation of people movement, focussing on maximising the throughput of sustainable modes (i.e. Walking, Cycling and Bus modes), travel by means of a private car is not prohibited along the Core Bus Corridor and is facilitated through the provision of general traffic lanes in both directions.

The Proposed Scheme along the Old Cabra Road / Prussia Street / Manor Street section includes operation of bus gates on a 24-hour basis. It should be noted that although a bus gate will prevent general traffic movement along Old Cabra Road and between Prussia Street and Manor Street, this does not preclude access to Stoneybatter by car and other traffic. Car access from the south will be available via Brunswick Street North, and from the north either via Cabra Road / North Circular Road Infirmery Road / North Quays or via local streets such as Oxmantown Road.

3.2.30 CPO-32 – Jackie and Bernard Smyth (151 Navan Road)

3.2.30.1 Description of the Proposed Scheme at this location

In order to achieve the Proposed Scheme objectives along this section of the corridor on the R147 Navan Road, as described in section 4.5.4.1 of Chapter 4 of Volume 2 of the EIAR, the Proposed Scheme will generally consist of a bus lane and general traffic lane in each direction, with one-way cycle tracks alongside the proposed inbound and outbound bus lanes, each adjacent to a footpath. Permanent and temporary land take will be required from a number of properties, with the majority being residential.

The existing road cross section in this location consists of a footpath and on-road cycle lane on each side of the carriageway with one general traffic lane in each direction and a bus lane in the outbound direction. A bus stop layby exists on the outbound carriageway.

At this property the width of land to be permanently acquired ranges between 2.5m and 2.7m. This will require the relocation of the existing boundary wall and any adjacent vegetation.

The relevant extract from the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description is shown in Figure 3.2.91, the existing aerial view in Figure 3.2.92, and existing street view in Figure 3.2.93.

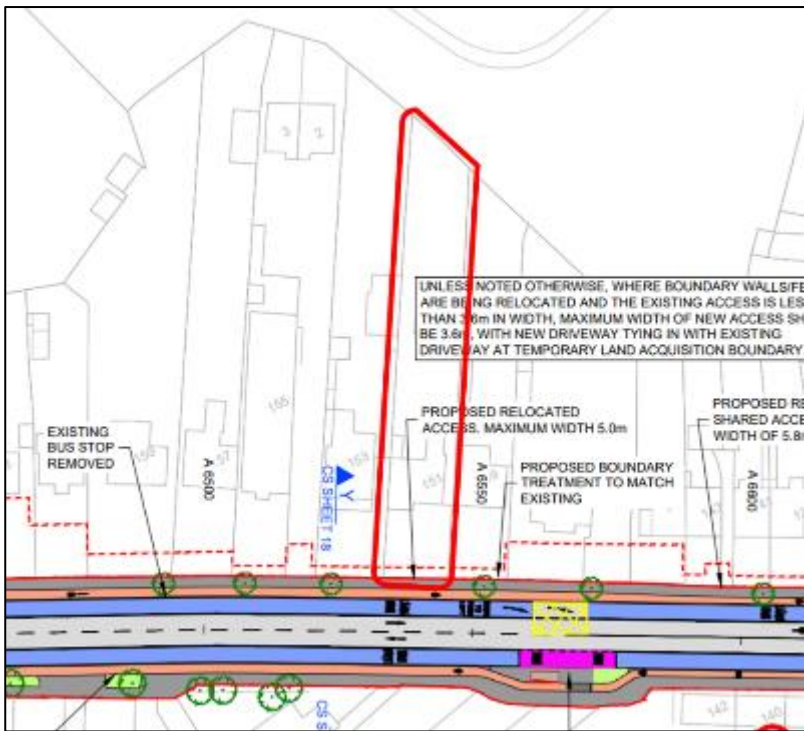


Figure 3.2.91: Proposed new Layout at 151 Navan Road



Figure 3.2.92: Existing aerial view at 151 Navan Road (Image Source: Google)



Figure 3.2.93: Existing Street View at 151 Navan Road (Image Source: Google)

3.2.30.2 *Summary of Observations Raised*

This submission objected to the CPO for the reasons summarised as follows:

1. Driveway access and parking

The submission noted that the Proposed Scheme will curtail the available parking area which is shared with 151A Navan Road. The submission stated that safe parking is regularly required for up to five cars, facilitating provision for occupants and carers, with additional space needed in the event of visitors. Additionally, the submission noted that a resident requires a wheelchair accessible parking space facility in the driveway.

The submission also raised concerns about safe access and egress due to the curtailment of driveway space.

2. Safety

The submission noted that three children reside at the property, two with special needs and pose a “flight risk”. The submission raised concern that there are increased safety risks associated with moving the road closer to the property.

3. Air quality

4. Noise and vibration

5. Impact on property value

3.2.30.3 *Response to Observations Raised*

Detailed responses to the issues raised in points 3 to 5 of this submission are provided in sections 2.2.3 of this report.

1. Driveway access and parking

The permanent acquisition will result in the maximum loss of approximately 2.7m of the driveway /garden area with an additional 2.5m temporarily required to allow for the construction of boundary treatment works and tying into the existing garden/driveway.

The edge of the proposed bus lane will be 0.9m closer to the residence than the kerb of the existing general traffic lane. The 12.2m long front boundary wall, including gate and entrance pillars will be at least 10.8m from the front of the house.

As noted within the submission, consultations with the landowner have been undertaken. A sketch was presented in November 2021 for the landowner's consideration with respect to parking and accessing/egressing the property. Four cars can be accommodated side-by-side within the driveway as per the existing layout. The driveway space will allow for an additional fifth parked vehicle to the rear/side.

In addition, the general arrangement drawing BCIDC-ARP-GEO_GA-0005_XX_00-DR-CR-0026 for the Proposed Scheme in Volume 3 of the EIAR indicatively shows a proposed relocated access to the property with a maximum width of 5.0m to facilitate access and egress.

The principle of how residents can access/egress their property is unchanged by the scheme proposals. The existing access/egress scenario is similar to the proposed with the requirement for a vehicle to be driven across a cycle lane/cycle track and footpath. 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.

2. Safety

The permanent acquisition will result in the maximum loss of approximately 2.7m of the driveway /garden area with an additional 2.5m temporarily required to allow for the construction of boundary treatment works and tying into the existing garden/driveway. The edge of the proposed bus lane will be 0.9m closer to the residence than the kerb of the existing general traffic lane. The 12.2m long front boundary wall, including gate and entrance pillars will be at least 10.8m from the front of the house.

Additionally, the provision of the segregated cycle track will result in an offset from the property boundary to the cycle track of 2.0m. As noted in the scheme description, a 2.0m wide footpath separates the property boundary from the proposed cycle track.

As noted in Chapter 4 'Proposed Scheme Description' of the EIAR, reinstatement of property frontage including boundary walls, gates, railings driveway, footpath and landscaping will be on a like-for-like basis.

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.

The reinstatement of the boundary treatment will ensure a physical barrier is provided between the Proposed Scheme and the property, on a 'like for like' basis.

With reference to the concerns raised regarding an increase to vehicle usage of the Navan Road, Chapter 6 'Traffic and Transport' of the EIAR outlines the results of the traffic assessment along this section of the route, and specifically section 6.4.6.3 'Operational Phase Summary', where it has been determined that there will be a positive, significant and long-term reduction in general traffic flows along the Proposed Scheme.

"Overall, it has been determined that the impact of the reduction in general traffic flows along the Proposed Scheme will be Positive, Significant and Long-term whilst the impact of the redistributed general traffic along the surrounding road network will be Negative, Slight and Long-term.

Thus, overall, there will be no significant deterioration in the general traffic environment in the study area as a consequence of meeting the scheme objectives of providing enhanced sustainable mode priority along the direct study area."

In terms of safety, a Road Safety Audit has been undertaken for the Proposed Scheme and is included as Appendix M of the Preliminary Design Report provided in the Supplementary Information. This audit did not highlight any safety concerns with the proposed arrangement.

4. Response to Individual Submissions on the Proposed Scheme

4.1 01- Pat Allison

4.1.1 Submission – Navan Road

The PRO of the Navan Road Community Council requested an oral hearing and raised the following issues:

1. Consultation process
2. Planning documentation
3. Removal and provision of trees
4. Alternative route options (loss of residential amenity)
5. Bus stops
6. Removal of Ashtown roundabout
7. Noise and vibration
8. Road safety
9. Our Lady Help of Christians Catholic Parish Church
10. Castleknock Road / Blackhorse Avenue junction
11. Site notices

The submissions suggested that there should be site notices attached to every bus stop advising that the plans and relevant information is on display in the planning office and the Cabra Library.

4.1.2 Response to submission

Detailed responses to points 1 to 10 of this submission are provided in section 2.2.3 and 2.10.2 of this report.

11. Site notices

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 51 locations along the route of the Proposed Scheme, supplementing the statutory notices for the CPO.

The locations of the non-statutory site notices were as follows:

- Multi-occupancy plots
- Recreational areas and green spaces
- Lands with changing functionality
- Public Right of Way extinguishments and/or restrictions
- Private Right of way acquisitions and/or restrictions

4.2 02- Annamoe Park Residents Association

4.2.1 Submission – Phibsborough and adjacent streets

The submission objected to the traffic management proposals that would extinguish traffic travelling to North Circular Road southbound along Annamoe Road. It raised the following issues:

1. Site notice on Annamoe Road

The submission stated that a site notice was erected on 15th August 2022 advising that observations / objections must be submitted to An Bord Pleanála by 30th August 2022.

2. Lack of public consultation on proposed traffic management measures
3. Transport modelling
4. Increase in traffic flows and associated safety and journey time impacts

4.2.2 Response to submission

Detailed responses to points 2 to 4 of this submission are provided in section 2.5.3 and 2.10.2.5 of this report.

1. Site notice on Annamoe Road

The site notice was erected on 30th June 2022. Refer to Figure 4.2.1 below which shows an image of the site notice fixed to the lighting column on the right-hand side of the image. This image is taken from Google streetview dated July 2022.



Figure 4.2.1: Image dated July 2022 showing Site Notice fixed to lighting column (@ 2022 Google)

4.3 03 - Aughrim Street Residents' Association

4.3.1 Submission – Stoneybatter and adjacent streets

The submission expressed support for BusConnects objectives for the provision of an effective and efficient public transport system and provision of safe cycle lanes. The submission acknowledged that the NTA engaged with the Stoneybatter community through meetings, with revisions made to the Proposed Scheme to take account of concerns.

However, the submission raised the following issues:

1. Consultation process
2. Impact on Aughrim Street
3. Impact on Prussia Street, Manor Street and Stoneybatter (Relaxation of Bus Gates at non-peak hours)
4. Increased vibrations

The submission raised concerns that the vibration from increased traffic will impact the light foundations of the old Victorian houses on Aughrim Street

5. Air quality
6. Landscaping and Greening Stoneybatter

4.3.2 Response to submission

Detailed responses to the issues raised by points 1 to 3, 5 and 6 of this submission are provided in sections section 2.10.2 and 2.4.3 of this report.

4. Increased vibrations

As no alterations are proposed to Aughrim Street and there is a forecasted reduction in traffic flow, there will be no vibration impacts during both construction and operational phases as a result of the Proposed Scheme.

4.4 04- Edel Behan

4.4.1 Submission – Phibsborough and adjacent streets

The submission objected to the traffic management proposals in Phibsborough, requested an oral hearing and raised the following issues:

1. Lack of public consultation on proposed traffic management measures
2. Impacts on local access

The submission stated that the proposals at Monck Place and Avondale Avenue will “landlock” residents impacted by these proposed changes.

3. Increased traffic flows and associated safety and journey time impacts
4. Air quality
5. Cabra Road / North Circular Road Junction (@ St Peter’s Church)

4.4.2 Response to submission

Detailed responses to the issues raised by points 1 and 3 to 5 in this submission are provided in section 2.5.3 of this report.

2. Impacts on local access

While it is acknowledged that residents in Great Western Square will not be able to travel southbound on Phibsborough Road via Monck Place or Phibsborough, as noted in section 2.3.3.1 of this report, tables 6.64 and 6.69 in Chapter 6 of Volume 2 of the EIAR forecast a significant reduction in general traffic flow along North Circular Road at AM and PM peak hour respectively following the implementation of the Proposed Scheme. Thus, travelling along North Circular Road will provide a reasonable journey time alternative.

4.5 05- Colm Bodkin

4.5.1 Submission – Phibsborough and adjacent streets

The submission objected to the traffic management proposals on Charleville Road and raised the following issues:

1. Increased traffic flows and associated safety and journey time impacts
2. Suggested making Charleville Road local access only or restricted during peak hours
3. Lack of public consultation on proposed traffic management measures

4. Data collection (traffic and transport)

5. Air quality

4.5.2 Response to submission

Detailed responses to the issues raised in points 1 and 3 to 5 in this submission are provided in section 2.5.3 of this report.

2. Suggested making Charleville Road local access only or restricted during peak hours

The proposed traffic management measure will limit the use of Charleville Road as a through-route, while also facilitating local access.

4.6 06 – Dr Aoife Bourke & Dr Megan Wilson

4.6.1 Submission – Phibsborough and adjacent streets

The submission welcomed proposals on Navan Road and Stoneybatter. However, the submission objected to the traffic management measures proposed to be implemented outside of the Core Bus Corridor route, due to the impact on Connaught Street and surrounding communities.

The submission requested an oral hearing and raised the following issues:

1. Planning documentation
2. Lack of public consultation on proposed traffic management measures
3. Increase in traffic flows and associated safety and journey time impacts
4. Inadequate referencing and lack of consistency in documentation
5. Discrepancies in drawings
 - Charleville Road
 - Annamoe Terrace and Road
6. Cabra Road / North Circular Road junction (@ St Peter's Church)
7. Cumulative impacts
8. Data Collection;
 - Traffic and Transportation
 - Air Quality
 - Noise and Vibration
 - Road Safety Audits

4.6.2 Response to submission

Detailed responses to the issues raised by this submission are provided in sections 2.10.2 and 2.5.3 of this report.

4.7 07- Susan Bowers, Juliet Bowers & Beatrice Bowers

4.7.1 Submission – Phibsborough and adjacent streets

The submission objected to the proposals on Monck Place and raised the following issues:

1. Increased traffic flow and associated safety and journey time impacts

The submission stated that the proposals at Monck Place will increase congestion at Doyle's corner as residents of Avondale Avenue, Avondale Road and surrounding areas will not be able to use Monck Place to proceed southbound along Phibsborough Road

2. Providing for mobility impaired users
3. Lack of public consultation on proposed traffic management measures
4. No cycle lanes provided

The submission stated that there are no proposals for the introduction of cycle lanes along this route.

4.7.2 Response to submission

Detailed responses to the issues raised by points 1 to 3 of this submission are provided in section 2.5.3 of this report.

4. No cycle lanes provided

While it would also be desirable to improve all surrounding areas, the Proposed Scheme has focussed on improving facilities along the corridor, based on the scheme objectives. It is likely that future schemes, brought forward either by the relevant Local Authority or the NTA, will address other locations at a future date.

4.8 08 – Ciara Browne

4.8.1 Submission – Phibsborough and adjacent streets

The submission supported the larger BusConnects project, however it expressed concerns with the traffic management proposals on Monck Place and raised the following issues:

1. Lack of public consultation on proposed traffic management measures
2. Increased traffic flow and associated safety and journey time impacts

4.8.2 Response to submission

Detailed responses to the issues raised by this submission are provided in section 2.5.3 of this report.

4.9 09- Rachel Byrne

4.9.1 Submission – Phibsborough and adjacent streets

The submission confirmed support for the Proposed Scheme.

4.9.2 Response to submission

A detailed response to the points raised by this submission is provided in section 2.5.3.4.

4.10 10- Cabra Park Residents Association

4.10.1 Submission – Phibsborough and adjacent streets

The submission objected to the Proposed Scheme due to the impact on St Peter's Road.

The submission requested an oral hearing and raised the following issues:

1. Increased traffic flows and associated safety and journey time impacts
2. Flawed classification system
3. Future housing developments

4.10.2 Response to submission

A detailed response to the issues raised by this submission is provided in section 2.5.3 and 2.10.2 of this report.

4.11 11 – Dara Cassidy and Séan MacAmhlaigh

4.11.1 Submission – Various

The submission raised the following issues:

1. Consultation process
2. Use of appropriate baseline modelling
3. Change in travel demand and patterns of travel due to COVID-19 pandemic
4. Traffic modelling
5. Loss of parking without appropriate rationale

The submission noted the proposed removal of parking spaces has not considered the significant volume of new residential and commercial development that is underway in these areas (e.g. Prussia Street).

6. Planning documentation

The submission stated that the planning drawings provide detail of the scheme but not on the implications for surrounding roads where traffic will be diverted.

7. Evening traffic congestion

The submission stated that proposals do not deal with evening traffic congestion as outbound vehicle traffic merges with bus lanes.

8. Assessment of the impact to users of Phoenix Park is insufficient

The submission stated that Phoenix Park is a crucial amenity and the impact on users has not been adequately assessed.

4.11.2 Response to submission

Detailed responses to the issues raised by points 1 to 4 and 6 of this submission are provided in sections 2.10.2 of this report.

5. Loss of parking without appropriate rationale

Section 1.2 of Chapter 1 of Volume 2 of the EIAR states the following:

“The aim 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. The objectives of the Proposed Scheme 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*
- *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”*

As noted in section 6.4.6.1.1.4 of Chapter 6 of Volume 2 of the EIAR:

“The potential impacts of the Proposed Scheme on parking and loading provision have been assessed through a comparison of the availability of spaces or lengths of bay in the Do Minimum and Do Something scenarios. The assessment considers the impact of any changes on the general availability of parking and loading in the vicinity of the Proposed Scheme. It classifies parking into the following categories:

- *Designated Paid Parking*
- *Permit Parking*
- *Disabled Permit Parking*
- *Loading / Unloading (in designated Loading Bays)*
- *Loading / Unloading (outside designated Loading Bays)*
- *Taxi Parking (Taxi Ranks)*
- *Commercial vehicles parked for display (car sales)*
- *Informal Parking (i.e. parking alongside the kerb which is unrestricted)*

This qualitative assessment has also taken into account nearby parking, which is defined as alternative parking locations along side roads within 200 – 250m of the Proposed Scheme. Significance ratings for the impacts of any changes in parking provision have been generated for each specific instance of change and for each section of the Proposed Scheme. The ratings are based upon professional judgement and experience and consider:

- *The magnitude of change in parking availability*
- *The availability of alternative parking*
- *Nearby land uses, such as businesses. Note that the parking and loading assessment has been undertaken as a qualitative analysis based on the above criteria and does not generate a resulting LoS rating”*

The Do Something scenario represents the likely conditions of the direct and indirect study areas with the Proposed Scheme in place.

The Do Minimum scenarios (in both 2028 and 2043) include all other elements of the BusConnects Programme of projects (apart from the CBC 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.

As noted in section 6.4.2 of Chapter 6:

“With regards to this Traffic and Transport chapter, the ‘Do Nothing’ scenario means there would be no changes to existing transport infrastructure, so infrastructure provision for buses, pedestrians and cyclists would remain the same.

The streetscape would continue to be based around the movement and parking requirements of private cars instead of people. High levels of traffic are associated with discouraging pedestrian and cyclist activity and this activity would be further discouraged as traffic congestion remains the same or increases. The baseline situation of congestion and journey time reliability issues for buses would also continue, and potentially be exacerbated over time as traffic congestion increases in line with travel demand growth.”

Section 6.4.6.3 of Chapter 6 also notes the following:

“In the absence of the Proposed Scheme, bus services will be operating in a more congested environment, leading to higher journey times and lower reliability for bus journeys. This limits their attractiveness to users, and this will lead to reduced levels of public transport use, making the bus system less resilient to higher levels of growth. The absence of walking and cycling measures that the Proposed Scheme provides will also significantly limit the potential to grow those modes into the future.

On the whole, the Proposed Scheme will make a significant contribution to the overall aims of BusConnects that is a key part of the GDA Strategy and will enable the city to grow sustainably into the future. This would not be possible in the absence of the Proposed Scheme.”

6. Planning drawings provide detail of the scheme itself but not on the implications for surrounding roads where traffic will be diverted

Proposed traffic management measures are shown on General Arrangement drawings in Volume 3 of the EIAR. This includes proposed turn bans along with a number of existing turn bans on side streets adjacent to the proposed core bus corridor, where included within the scheme boundary.

The impact of the Proposed Scheme on the surrounding road network has been considered in Chapter 6 Traffic and Transport of Volume 2 of the EIAR.

Refer to section 2.5.3.1 of this report for further details.

7. Evening traffic congestion

The impact of the Proposed Scheme on traffic flows has been assessed for the PM Peak hour. The results of the assessment are summarised in Section 6.4.6.2.8.5 of Chapter 6 of Volume 2 of the EIAR.

8. Assessment of the impact to users of Phoenix Park is insufficient

The impacts of the Proposed Scheme include traffic and transport, air quality and noise and vibration.

The traffic and transport assessment is outlined in Chapter 6 Traffic and Transport of Volume 2 of the EIAR. A number of roads within Phoenix Park are included in the Indirect Study area of the assessment and these impacts are shown in figure 6.7 and 6.8 of Volume 3 of the EIAR.

The transport model indicates that flows along specific sections of Phoenix Park are forecast to decrease by 123 vehicles per hour on North Road and 152 vehicles per hour on Chesterfield Avenue at AM peak hour (refer to diagram 6.24 and Table 6.64 of Chapter 6). In the PM peak hour the transport model forecasts that a western section of North Road will have a decrease of 155 vehicles per hour and an eastern section of North Road will have an increase of 264 vehicles per hour, and an eastern section of Chesterfield Avenue will have an increase of 215 vehicles per hour (refer to diagram 6.25 and tables 6.69 and 6.70 of Chapter 6).

As noted in table 22 and table 23 in Appendix A6.4 Impact Assessments, the Significance of Effect at the various North Road and Chesterfield Avenue junctions, as a result of the Proposed Scheme, is noted as Not Significant.

The air quality assessment is outlined in Chapter 7 Air Quality of Volume 2 of the EIAR. The results of the air quality assessment are shown in figures 7.3 – 7.8 of Volume 3 of the EIAR.

- As shown on figure 7.3 and 7.6, the relevant receptors indicate between a negligible to moderate adverse impact in terms of the annual mean N_{O_2} concentration during operation and construction. The moderate adverse impact is experienced at one receptor adjacent to the park at the Infirmary Road/ Conyngham Road junction.
- As shown on figure 7.4 and 7.7 of Volume 3 of the EIAR, the relevant receptors indicate a negligible impact in terms of the annual mean PM10 concentrations during operation and construction.
- As shown on figure 7.5 and 7.8 of Volume 3 of the EIAR, the relevant receptors indicate a negligible impact in terms of the annual mean PM2.5 concentration during operation and construction.

The noise and vibration assessment is outlined in Chapter 9 Noise and Vibration of Volume 2 of the EIAR. The results of the noise and vibration assessment during construction, in the opening year and in the design year are shown in figures 9.3 to 9.5 of Volume 3 of the EIAR.

- As shown figure 9.3 the impact of noise in Phoenix Park during construction is assessed as slight-moderate to imperceptible/positive.
- As shown figure 9.4 the impact of noise in Phoenix Park in the opening year 2028 is assessed as slight-moderate to imperceptible/positive.
- As shown figure 9.5 the impact of noise in Phoenix Park in the design year 2043 is assessed as not significant to imperceptible/positive.

4.12 12 - Brian Chadwick

4.12.1 Submission – Phibsborough and adjacent streets & Stoneybatter and adjacent streets

The submission welcomed proposals on Navan Road and Stoneybatter such as segregated cycle lanes, widening of footpaths and improvements to public realm. However, the submission objected to the traffic management measures proposed to be implemented outside of the Core Bus Corridor route, due to the impact on Connaught Street and surrounding communities, and impact on access to Aughrim Place.

The submission requested an oral hearing and raised the following issues:

1. Impact on St Joseph’s Road, Oxmantown Road, Manor Place, Cowper Street, Aughrim Place, Arbour Hill, Montpellier Hill, Ard Righ Road and Infirmary Road (access to Aughrim Place)
2. Planning documentation
3. Lack of public consultation on proposed traffic management measures
4. Increase in traffic flows and associated safety and journey time impacts
5. Use of appropriate baseline modelling
6. Flawed classification system
7. Inadequate referencing and lack of consistency in documentation
8. Discrepancies in drawings
 - Charleville Road
 - Annamoe Terrace and Road
9. Cabra Road / North Circular Road junction (@ St Peter’s Church)
10. Cumulative impacts
11. Data Collection
 - Traffic and Transportation
 - Air Quality
 - Noise and Vibration
 - Road Safety Audits

4.12.2 Response to Submission

Detailed responses to the issues raised by this submission are provided in sections 2.4.3, 2.10.2 and 2.5.3 of this report.

4.13 13 - Dr Lucy Chadwick

4.13.1 Submission – Phibsborough and adjacent streets & Stoneybatter and adjacent streets

The submission welcomed proposals on Navan Road and Stoneybatter such as segregated cycle lanes, widening of footpaths and improvements to public realm. However, the submission objected to the traffic management measures implemented outside of the Core Bus Corridor route, in particular, to the proposals on Connaught Street.

The submission requested an oral hearing and raised the following issues:

1. Impact on St Joseph’s Road, Oxmantown Road, Manor Place, Cowper Street, Aughrim Place, Arbour Hill, Montpellier Hill, Ard Righ Road and Infirmary Road (access to Aughrim Place)
2. Planning documentation
3. Lack of public consultation on proposed traffic management measures
4. Increase in traffic flows and associated safety and journey time impacts
5. Use of appropriate baseline modelling
6. Flawed classification system
7. Inadequate referencing and lack of consistency in documentation
8. Discrepancies in drawings
 - Charleville Road
 - Annamoe Terrace and Road
9. Cabra Road / North Circular Road junction (@ St Peter’s Church)
10. Cumulative impacts
11. Data Collection
 - Traffic and Transportation
 - Air Quality
 - Noise and Vibration
 - Road Safety Audits

4.13.2 Response to submission

Detailed responses to the issues raised by this submission are provided in sections 2.4.3, 2.10.2 and 2.5.3 of this report

4.14 14 – Stephen Clancy

4.14.1 Submission – Phibsborough and adjacent streets

The submission confirmed support for the Proposed Scheme.

4.14.2 Response to submission

A detailed response to the points raised by this submission is provided in section 2.5.3.4 of this report.

4.15 15 - Jim Clarke

4.15.1 Submission – Phibsborough and adjacent streets

As the proprietor of the Phibsborough House Pub, the submission raised the following issues:

1. Deliveries to the pub
2. Right turn to Phibsborough Road from Monck Place is important to enable access to the city and for school runs.

4.15.2 Response to submission

1. Deliveries to the pub

Phibsborough House Pub is located at 36 Phibsborough Road at the corner of Monck Place. Figure 4.15.1 below is an extract from the General Arrangement Drawings from Volume 3 of the EIAR and indicates the Proposed Scheme adjacent to the Phibsborough House Pub. Figure 4.15.1 also shows the Ballymun/ Finglas Bus Corridor adjacent to the public house. As noted in Chapter 4 Proposed Scheme Description of Volume 2 of the EIAR *no access is proposed from Phibsborough Road onto Phibsborough and Monck Place, along with the introduction of right turn bans onto Phibsborough Road*. Access is available to Monck Place via the surrounding road network.

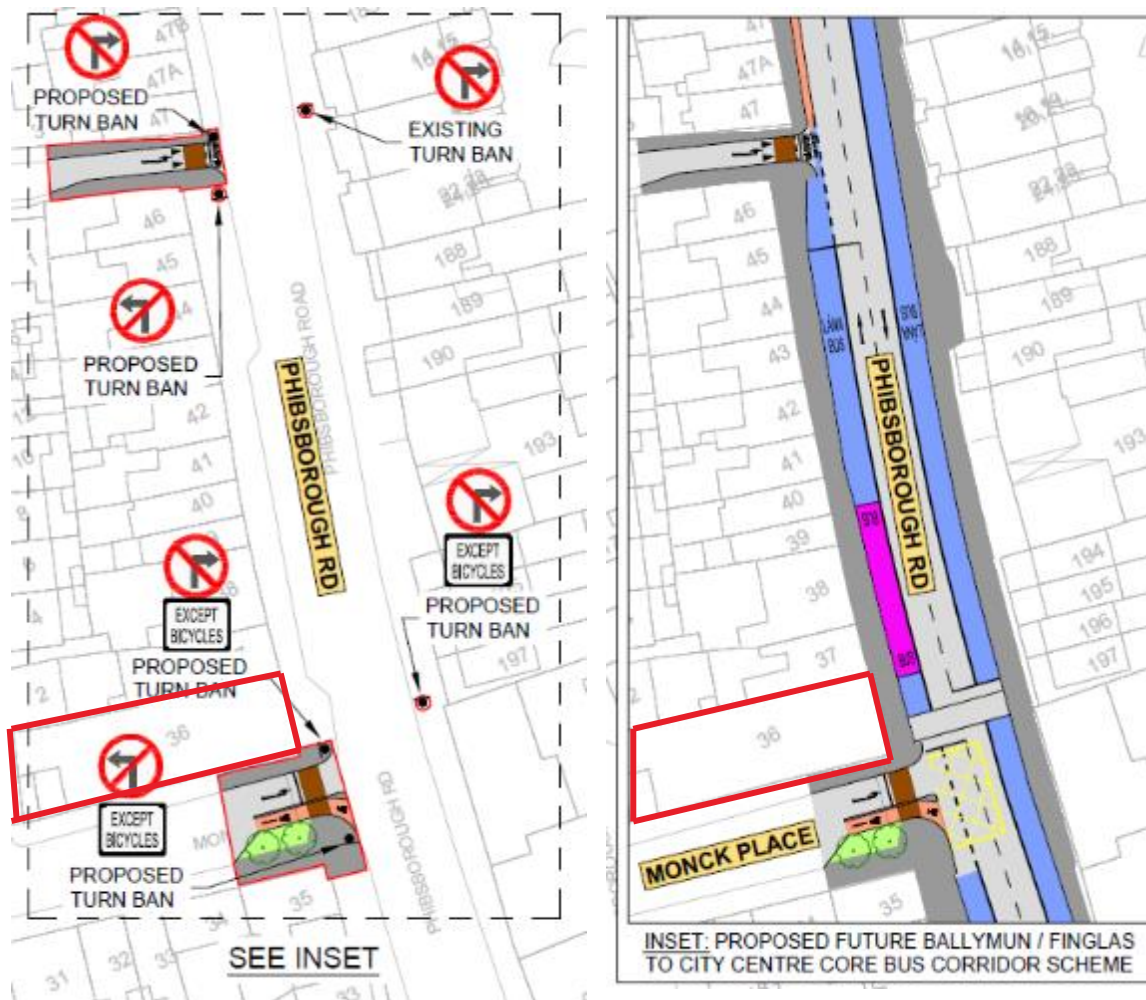


Figure 4.15.1: Extracts from General Arrangement Drawings with 36 Phibsborough Road noted

Right turn to Phibsborough Road from Monck Place is important to enable access to the city and for school runs.

Access to the city will still be available via the surrounding road network. The following is noted in section 4.5.5.1 of Chapter 4 Proposed Scheme of Volume 2 of the EIAR:

“ traffic management measures such as one-way streets and / or turn bans will be required to minimise traffic impacts on side roads due to diverted traffic (which may occur due to the priority given on the Proposed Scheme to pedestrians, cyclists and buses). ”

“No access is proposed from Phibsborough Road onto Phibsborough and Monck Place, along with the introduction of right turn bans onto Phibsborough Road.”

While it is acknowledged that there will be no access to travel southbound on Phibsborough Road via Monck Place or Phibsborough, tables 6.64 and 6.69 in Chapter 6 of Volume 2 of the EIAR forecast a significant reduction in general traffic flow along North Circular Road at AM and PM peak hour respectively following the implementation of the proposed scheme. Thus, travelling along North Circular Road will provide a reasonable journey time alternative.

4.16 16 – Jonathan & Anne Clarke

4.16.1 Submission – Navan Road

The submission stated that they reaffirmed all the issues raised in the Navan Road Community Council submission and in addition raised the following concerns:

1. Need for the Proposed Scheme
2. Removal of bus stops

The submission suggested that at least 30% of bus stops could be reduced to reduce bus journey times

3. Alternative Route Options (use Navan Road for an inbound bus lane and Blackhorse Avenue for an outbound bus lane)
4. Road safety (Pedestrian infrastructure)

4.16.2 Response to submission

Detailed responses to the issues raised by points 1, 3 and 4 are provided in sections 2.2.3 and 2.10.2 of this report.

2. Removal of bus stops

It is noted in section 4.6.4.5 of Chapter 4 Proposed Scheme Description of Volume 2 of the EIAR that a bus stop review has been completed. It states the following:

“to improve the efficiency of the bus service along the Proposed Scheme the position and number of bus stops has been evaluated as part of a bus stop review. The main principles considered as part of the bus stop review were as follows:

- *Aim to achieve a bus stop spacing of 400m in suburban locations, and 250m in urban centres*
- *Locate bus stop as close as possible to nearest junction/pedestrian crossing*
- *Locate bus stop downstream of junction rather than upstream*
- *Consider space requirements to provide bus stop including shelter, waiting area, cycle lane and footpath provision and information displays*
- *Review existing and proposed boarding and alighting volumes to determine the usage of the bus stop*
- *Consider the potential for interchange with orbital bus services proposed as part of the New Dublin Area Bus Network.*

The above principles were considered to determine whether a bus stop should remain where it is, be relocated or be removed.”

4.17 17 – Connaught Street Resident’s Association

4.17.1 Submission – Phibsborough and adjacent streets

The submission welcomed proposals on Navan Road and Stoneybatter such as segregated cycle lanes, widening of footpaths and improvements to public realm.

However, the submission objected to the traffic management measures proposed outside of the Core Bus Corridor route, in the Navan Road and Stoneybatter areas, which will have serious impacts for the local communities and the communities in the Connaught Street area.

The submission requested that the Proposed Scheme be refused and requested an oral hearing.

The submission raised the following issues:

1. Planning documentation
2. Lack of public consultation on proposed traffic management measures
3. Increase in traffic flows and associated safety and journey time impacts
4. Use of appropriate baseline modelling
5. Flawed classification system
6. Inadequate referencing and lack of consistency in documentation
7. Discrepancies in drawings
 - Charleville Road
 - Annamoe Terrace and Road
8. Cabra Road / North Circular Road junction (@ St Peter’s Church)
9. Cumulative impacts
10. Data Collection
 - Traffic and Transportation
 - Air Quality
 - Noise and Vibration
 - Road Safety Audits

4.17.2 Response to submission

Detailed responses to the issues raised by this submission are provided in sections 2.10 and 2.5.3 of this report.

4.18 18 – Connecting Cabra

4.18.1 Submission – Old Cabra Road & Phibsborough and adjacent streets

Connecting Cabra is a community group seeking to empower and engage as many as possible to create a sustainable, low-carbon community in Cabra, Dublin 7.

The submission welcomed the Proposed Scheme, specifically interventions such as ‘Bus Gates’ and ‘continuous cycle lanes.’ However, the submission raised the following issues:

1. Annamoe Road/ Annamoe Terrace junction design

The submission raised concerns that the junction is “dangerously wide” and as a result does not adhere to DMURS and the BusConnects Design Guidance. The submission suggested that the junction design should be upgraded.

The submission also suggested the junction should have an at grade ‘courtesy crossing’ as this is the primary crossing point for pedestrians. They emphasised this point by stating DMURS section 4.3.2 “*Courtesy crossings should be considered where pedestrian demands are higher such as around Focal Points*”.

In addition, the submission highlighted that public realm could also be improved if the footpath was widened at the junction.

2. Support for the introduction of a 30 km/h speed limit on Old Cabra Road

The submission supported the introduction of the 30km/h speed limit on the Old Cabra Road and requested it be extended to the Cabra Road.

3. Flaws in cycle infrastructure design

The submission stated that there are serious shortcomings in the design of the cycling infrastructure. It noted that there is no clear cycle lane connection for cyclists travelling eastbound from Navan Road to Cabra Road. In addition, it stated that Cabra Road does not have a westbound cycle lane and Ratoath Road has no cycle lane and noted that these roads are listed as future secondary radial routes of the GDACN. It also noted the lack of safe cycle to school infrastructure on Ratoath Road.

The submission also questioned why Appendix A6.3 Junction Design Report of Volume 4 of the EIAR stated one of the reasons for changing the junction was to ‘connect to and from Ratoath Road cycle route (Radial Route 4b)’ despite their being no proposed cycle lane on Ratoath Road.

The submission noted the findings of a survey in which 81% of residents of Cabra Road would support a cycle lane on the road.

4. Traffic calming measures on Glenbeigh Road

The submission stated that Glenbeigh Road will experience an increase in traffic because of the Proposed Scheme. As a result, it suggested that traffic calming measures should be implemented in conjunction with courtesy crossings.

5. Upgrades to Swilly Road, Charleville Road and Annamoe Road

The submission noted areas where the design does not adhere to DMURS. It suggested that Swilly Road (7.5m wide), Charleville Road (10m wide) and Annamoe Road (8.5m wide) have too much space dedicated to vehicles and the carriageway widths exceed the recommended widths from DMURS which states “*The standard carriageway width on local streets should be between 5-5.5m (i.e. with lane widths of 2.5-2.75m).*”

The submission suggested wider footpaths should be provided on these roads by narrowing the carriageway.

The submission also suggested that the corner radii on Swilly Road and Ratoath Road should be reduced to align with the corner radii on Charleville Road and North Circular Road.

The submission welcomed the implementation of one-way systems on Swilly Road, Charleville Road and Annamoe Road, however it also suggested Quiet Street Treatment being introduced to these roads.

6. Enforcement

The submission raised concerns regarding the enforcement of proposed turn bans and the Bus Gate on Old Cabra Road.

4.18.2 Response to submission

The NTA welcomes the support from Connecting Cabra for the Proposed Scheme.

1. Annamoe Road/ Annamoe Terrace junction design

The aim 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.

As described in section 4.5.5.1 General overview of the Proposed Scheme of Chapter 4 Proposed Scheme Design of the EIAR:

“Traffic management measures such as one-way streets and / or turn bans will be required to minimise traffic impacts on side roads due to diverted traffic (which may occur due to the priority given on the Proposed Scheme to pedestrians, cyclists and buses). A short one-way northbound section will be required on Annamoe Road at its junction with Annamoe Terrace. (Refer to Figure 2.5.2 in section 2.5.1 of this report).”

While it would also be desirable to improve all surrounding areas, has focussed on improving facilities along the corridor, based on the scheme objectives.

As noted in table 6.64 and table 6.69 in Chapter 6 of the EIAR, at AM and PM peak hour, traffic flow is forecasted to reduce by 161 passenger car units (PCUs) on both Annamoe Road and Annamoe Terrace.

2. Support of the introduction of a 30 kmph speed limit on Old Cabra Road

As the Cabra Road does not form part of the Core Bus Corridor, altering the speed limit on the Cabra Road is outside the remit of the Proposed Scheme.

3. Flaws in cycle infrastructure design

Section 4.5.4.6 of Chapter 4 Proposed Scheme Description states the following:

“one way cycle tracks will be provided north and south of the junction with a two-way crossing proposed across the junction. Toucan crossings will be provided alongside shared space areas to enable pedestrians and cyclists to cross together.” (Refer to Figure 2.5.1 in section 2.5.1 of this report).

Shared use of space between pedestrians and cyclists is included at the Navan Road / Ratoath Road junction which in tandem with the proposed two-way cycle crossing, reflects the need to cater for a range of movements at this location. Provision of signage and road markings will encourage cyclists to carefully negotiate these areas such that safety of pedestrians is not compromised.

The suggested introduction of cycle lanes on Ratoath Road and Cabra Road are noted by the NTA. As noted above in section i of this response, the aim of the Proposed Scheme is to provide enhanced walking, cycling and bus infrastructure on this key access corridor in the Dublin region. While it would also be desirable to improve all surrounding areas, the Proposed Scheme has focussed on improving facilities along the corridor, based on the scheme objectives. It is possible that future schemes, brought forward either by the relevant local authority or the NTA, will address these connections and the Proposed Scheme allows for this to happen at a future date.

4. Traffic calming measures on Glenbeigh Road

As noted in tables 6.64 and 6.69 of Chapter 6 of Volume 2 of the EIAR, traffic flows on Glenbeigh Road are forecast to be approximately halved in number at AM and PM peak hours as a result of the Proposed Scheme.

While it would also be desirable to improve all surrounding areas, the Proposed Scheme has focussed on improving facilities along the corridor, based on the scheme objectives.

5. Upgrades to Swilly Road, Charleville Road and Annamoe Road

As noted in table 6.64 in Chapter 6 of the EIAR, at AM peak hour, traffic flow is forecasted to reduce by 123 PCUs.

At PM peak hour, the change in traffic flows is forecasted to be less than 100 PCUs (i.e. approximately 1 vehicle per minute per direction), which is a very low level of change in traffic flow.

With respect to Swilly Road, at both AM and PM peak hours, the change in traffic flows is forecasted to be less than 100 PCUs (i.e. approximately 1 vehicle per minute per direction), which is a very low level of change in traffic flow.

As noted in section 1 of this response, traffic flows for Annamoe Road are also forecasted to reduce.

As shown on Figure 2.5.1, Figure 2.5.2 and Figure 2.5.3 of this report, the traffic management measures consist of one-way streets and / or turn bans which will be required to minimise traffic impacts on these side roads due to diverted traffic (which may occur due to the priority given on the Proposed Scheme to pedestrians, cyclists and buses).

While it would also be desirable to improve all surrounding areas, the Proposed Scheme has focussed on improving facilities along the corridor, based on the scheme objectives.

6. Enforcement

The NTA acknowledges the comments raised in relation to enforcement. Enforcement of road traffic laws, including turning bans at junctions and Bus Gates is a matter for An Garda Síochána.

4.19 19 – Councillor Pamela Conroy

4.19.1 Submission – Mulhuddart / Blanchardstown & Castleknock Manor

The submission welcomed the benefits of the Proposed Scheme in terms of making the bus a more viable option and noted improvements to public transport are vital to ensure people make the necessary modal shift to meet emission reduction targets.

The submission also welcomed the plan to improve active travel infrastructure. However, the submission raised concerns about some aspects of the proposed active travel measures. The submission raised the following issues:

1. Slip lanes at junctions
2. Bus Interchange Design

The submission stated that pedestrians will require multiple phases to cross the road due to general traffic travelling each side of the interchange and requested that vehicular access be relocated from the current car park entrance to west of the Bus Interchange.

3. Provision of additional cycle lanes
4. Castleknock Manor

4.19.2 Response to submission

Detailed responses to points 1, 3 and 4 raised in this submission are provided in sections 2.1.3 and 2.7.3 of this report.

2. Bus Interchange Design

The interchange layout comprises of bus lanes and adjacent bus bays, cycle and pedestrian facilities, and traffic lanes, and provides an appropriate arrangement for safe use by all road users and gives safe access for pedestrians from the bus interchange to shopping areas to the north and south, and safe cycle access to and through the bus interchange area, and access for cars in and out of the adjacent car park. Shared use of space between pedestrians and cyclists is included at a number of locations which reflects the need to cater for a range of movements at these locations. Provision of signage and road markings will encourage cyclists to carefully negotiate these areas such that safety of pedestrians is not compromised.

A new access to the carpark is proposed at Blanchardstown Road South which will remove a number of vehicles from the Bus Interchange area. The proposed location of the access facilitates vehicles travelling from the south thus negating the need for the vehicles to pass through the Bus Interchange area.

4.20 20 – Dominic Cooney

4.20.1 Submission – Stoneybatter and adjacent streets

The submission expressed concerns with the impact that the Proposed Scheme will have on Stoneybatter and raised the following issues:

1. Impact on Prussia Street, Manor Street and Stoneybatter
2. Removal of parking and loading bays from Prussia Street, Manor Street and Stoneybatter and St Joseph's Road
3. Land ownership boundaries

4.20.2 Response to submission

Detailed responses to the issues raised by this submission are provided in section 2.4.3 of this report.

4.21 21 – Susanne Crowe

4.21.1 Submission – Phibsborough and adjacent streets

The submission welcomed proposals on Navan Road and Stoneybatter. However, the submission objected to the traffic management measures proposed outside of the Core Bus Corridor route, in the Navan Road and Stoneybatter areas, which will have serious impacts for the local communities and the communities in the Connaught Street area. The submission noted that Connaught Street is in a Z2 zoned area (i.e. residential conservation area).

The submission requested that the Proposed Scheme be refused and requested an oral hearing.

The submission raised the following issues:

1. Planning documentation
2. Lack of public consultation on proposed traffic management measures
3. Increase in traffic flows and associated safety and journey time impacts
4. Use of appropriate baseline modelling
5. Flawed classification system
6. Inadequate referencing and lack of consistency in documentation
7. Discrepancies in drawings
 - Charleville Road
 - Annamoe Terrace and Road
8. Cabra Road / North Circular Road junction (@ St Peter's Church)
9. Cumulative impacts
10. Data Collection
 - Traffic and Transportation
 - Air Quality

- Noise and Vibration
- Road Safety Audits

4.21.2 Response to submission

Detailed responses to the issues raised by this submission are provided in sections 2.10.2 and 2.5.3 of this report.

4.22 22 – Brendan & Anne Curran

4.22.1 Submission – Phibsborough and adjacent streets

The submission welcomed proposals on Navan Road and Stoneybatter, including the introduction of segregated cycle lanes, along with widening of footpaths and improvements to public realm at Stoneybatter. However, the submission objected to the traffic management measures to be implemented outside of the Core Bus Corridor route.

The submission requested an oral hearing and raised the following issues:

1. Lack of public consultation on proposed traffic management measures
2. Increase in traffic flows and associated safety and journey time impacts
3. Cabra Road / North Circular Road Junction (@ St Peter's Church/Dalymount)
4. Use of appropriate baseline modelling
5. Flawed classification system
6. Site notice at Monck Place

The submission stated that the site notice was on the ground from 3rd July 2022 and not easily visible for residents.

4.22.2 Response to submission

Detailed responses to the issues raised by points 1 to 5 of this submission are provided in sections 2.5.3 and 2.10.2 of this report.

6. Site notice at Monck Place

An A3 sized site notice was erected at Monck Place on the 30th June 2022 on the lighting column as shown in Photograph 4.22.1

The site notice was regularly checked and if found to be on the ground, was re-erected.



Photograph 4.22.1: Image of erected site notice at Monck Place on 30th June

4.23 23 – Jeff Dalton and Others

4.23.1 Submission – Various

The submission expressed general support for the Proposed Scheme and raised the following issues:

1. Reduction in footpath widths
2. Removal and provision of trees
3. Alternative route options (reduction in private gardens)
4. Removal of the 122 bus service from Ashington to Drimnagh

The submission objected to the removal of the 122 bus service which would remove the only service that stops at the new Mater Hospital and would remove access to the Crumlin Children’s Hospital.

It stated that the 122 bus is the only service that proceeds along Dame Street/ Georges Street/ Camden Street and onwards to Drimnagh. The submission objected to the frequency of the 122 bus in the new plan and suggested it is not sufficient and needs to be increased.

5. Old Cabra Road Bus Gate (increase in traffic on surrounding roads)
6. Castleknock Road / Blackhorse Avenue Junction
7. Removal of Ashtown roundabout

4.23.2 Response to submission

Detailed response to the issues raised in points 1 to 3 and 5 to 7 of this submission are provided in sections. 2.2.3, 2.3.3 and 2.8.3 of this report.

4. Removal of the 122 bus service from Ashington to Drimnagh

The provision and improvement of the bus services in the GDA is constantly under review by the NTA. However, the provision or removal of bus services is not part of the scope of the Proposed Scheme planning application. The submission regarding the removal of the 122 bus service from Ashington to Drimnagh has been forwarded to the appropriate NTA department.

4.24 24 – Deerpark Area Residents Association

4.24.1 Submission – Castleknock Road/ Blackhorse Avenue Junction

The submission noted that the Deerpark Area Residents Association represents over 200 dwellings in the Castleknock area adjacent to Phoenix Park. The submission raised the following issues:

1. Castleknock Road / Blackhorse Avenue Junction
2. Lack of public consultation on proposed traffic management measures
3. Use of Compulsory Purchase Order to avoid public consultation

4.24.2 Response to submission

Detailed responses to the issues raised in this submission are provided in sections 2.8.3 and 2.5.3 of this report.

4.25 25 – Development Applications Unit

4.25.1 Summary of Submission – Whole Scheme

The submission noted that the EIAR included a desk based Archaeological Impact Assessment and noted broad agreement with findings of the Archaeology and Cultural Heritage sections of the EIAR. The Department proposed four conditions be attached to any planning consent, associated with these aspects.

The submission referred to the proposal to remove 1.46 ha of hedgerows and 0.67 ha of treeline. The submission stated that while incorporating trees and shrubs in the landscaping should ensure there will be no long-term loss of biodiversity as a result of vegetation clearance, the felling of trees and removal of hedges during the bird breeding season could lead to the destruction of nests, eggs and nestlings, and should be avoided. The Department recommended a condition be attached to any planning consent associated with this aspect.

The submission also noted that the EIAR identifies the possibility that pollutants mobilised into surface water runoff from the Proposed Scheme, including construction compounds, during construction could have adverse effects on aquatic biota occurring in water bodies. The submission noted that mitigation measures are set out in the Surface Water Management Plan (SWMP) and in the CEMP, supporting this application to prevent such pollutants being mobilised from the scheme and reaching water bodies. The Department recommended a condition be attached to any planning consent associated with this aspect.

4.25.2 Response to submission

Detailed responses to the issues raised in this submission are provided in section 2.9.2 of this report.

4.26 26–Donal Reilly & Collins Solicitors

4.26.1 Submission – Stoneybatter and adjacent streets

The submission noted their support for the Stoneybatter Pride of Place submission and raised the following issues:

1. Impact on Prussia Street, Manor Street and Stoneybatter
2. Removal of Parking and Loading Bays from Prussia Street, Manor Street, Stoneybatter and St Joseph's Road (impact on access to rear of 67 Prussia Street)
3. Land ownership boundaries
4. Impact on St Joseph's Road, Oxmantown Road, Manor Place, Cowper Street, Aughrim Place, Arbour Hill, Montpellier Hill and Infirmary Road

4.26.2 Response to submission

Detailed responses to the issues raised in this submission are provided in section 2.4.3 of this report.

4.27 27 – Garbhan Doran & Helen McLoughlin

4.27.1 Submission – Phibsborough and adjacent streets

The submission commended the introduction of segregated cycle lanes, widened footpaths and improvements in public realm associated with the Proposed Scheme. However, the submission raised the following issue:

1. Increase in traffic flows and associated safety and journey time impacts

4.27.2 Response to submission

A detailed response to the issue raised in this submission is provided in section 2.5.3 of this report.

4.28 28 – Eamonn Doyle

4.28.1 Submission – Navan Road

The submission requested an oral hearing and raised the following issues:

1. Consultation process
2. Noise and Vibration
3. Impact on property value
4. Driveway access and egress
5. Bus stops
6. Removal and provisions of trees
7. Bus journey time and reliability
8. Alternative options (assessment of operating bus lanes in one direction for short sections)
9. Old Cabra Road Bus Gates

4.28.2 Response to submission

This submission was also made in response to the CPO relating to the proposed acquisition of land from the premises. Detailed responses to the issues raised are provided in section 3.2.8 of this report.

4.29 29 – Dublin City Council

4.29.1 Submission – Whole Scheme

Dublin City Council's (DCC) submission comprises 50 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 2.4.10)
- C5 – Response to section 2.5 Conclusion
- C6 – Response to Appendix to DCC Submission

4.29.2 Response to submission

Detailed responses to the issues raised in this submission are provided in section 2.9.3 of this report.

4.30 30 – Dublin Commuter Council

4.30.1 Submission – Whole Scheme

The submission raised the following issues:

1. Advocate for the Proposed Scheme
2. Enforcement
3. Junction Design
4. Pedestrian Crossings
5. Shared Space
6. Bus Stop Design
7. Blanchardstown to M50 junction
8. M50 junction to Old Cabra Road junction
9. Old Cabra Road junction to Quays

4.30.2 Response to submission

Detailed responses to the issues raised in this submission are provided in section 2.9.4 of this report.

4.31 31 – Dublin Cycling Campaign

4.31.1 Submission – Whole Scheme

The submission requested an oral hearing and raised the following issues:

1. Introduction
2. National Mobility Policy Targets
3. Universal Design
4. Support for Design Aspects
5. Blanchardstown Town Centre
 - General
 - Junctions
 - Pedestrian Infrastructure
 - Cycling Infrastructure
 - Bus Interchange
6. N3 Widening

7. Castleknock Manor
8. Ashtown Road Junction Linkages
9. Cabra – Cycling connections
10. Adherence to Standards
11. EIAR documentation
12. Cycling Infrastructure Assessment
13. Transport Modelling Methodology

4.31.2 Response to submission

Detailed responses to the issues raised in this submission are provided in section 2.9.5 of this report.

4.32 32 – Ann Duffy

4.32.1 Submission – Navan Road

The submission raised the following issues:

1. Removal of parking layby

The submission noted that the layby has been there since 1956 and is a public amenity. The submission stated that as this layby is adjacent to four schools, it is used by parents to drop off and collect children, and also noted that this layby is used for parking for those attending the nearby Our Lady Help of Christians Parish Catholic Church.

2. Removal and provision of trees
3. Noise and vibration
4. Air quality

4.32.2 Response to submission

Detailed responses to the issues raised in points 2 to 4 of this submission are provided in section 2.2.3 of this report.

1. Removal of parking lay-by

Section 6.4.6.1.5.4 Parking and Loading of Chapter 6 Traffic and Transport of Volume 2 of the EIAR acknowledges the loss of parking along this section of the Navan Road and states:

“There are 19 informal residential parking spaces located on the south side of R147 Navan Road, between Nephin Road and Baggot Road. These spaces are located between the existing cycle lane and the existing footway, to the east and west of the Navan Road filling station. It is proposed to remove all of these spaces, to allow the addition of a westbound bus lane in this location. All of the houses on this section have private driveways, generally with space for two vehicles. The impact of this change is considered to have a Negative, Slight and Long-term effect.

There are five informal general / residential parking spaces located on the north side of R147 Navan Road, to the west of Our Lady’s Church, which has a private car park. Four of the informal spaces will be retained in the Proposed Scheme and will continue to be located between the cycle track and the footway. The impact of this change is considered to have a Negative, Slight and Long-term effect.”

4.33 33 – Fingal County Council

4.33.1 Submission – Whole Scheme

The topics within Fingal County Council’s submission were as follows:

1. Introduction
2. General Comments
3. Integration with Cycling
4. Impact of the proposed development on N3
5. Blanchardstown Town Centre – Transportation
6. Blanchardstown Town Centre – Public Realm
7. R147 Navan Parkway Interchange
8. Drainage
9. Conclusion

4.33.2 Response to submission

Detailed responses to the issues raised in this submission are provided in section 2.9.6 of this report.

4.34 34 – Alan Fitzgerald

4.34.1 Submission – Phibsborough and adjacent streets

The submission objected to traffic management proposals on Charleville Road, Monck Place, Annamoe Road and Annamoe Terrace. The submission requested an oral hearing and raised the following issues:

1. Lack of public consultation on proposed traffic management measures
2. Increase in traffic flows and associated safety and journey time impacts
3. Cabra Road / North Circular Road Junction (@ St Peter’s Church)
4. Road and Traffic Bill 2021
5. Supports the submission of the Rathdown Road, Charleville Road and Cherrymount Park Residents Association and Senator Marie Sherlock of the Labour Party

4.34.2 Response to submission

Detailed responses to the issues raised in this submission are provided in sections 2.5.3 and 2.10.2 of this report.

The NTA notes the support for the submissions of Rathdown Road, Charleville Road and Cherrymount Park Residents Association and Senator Marie Sherlock. Detailed responses to the issues raised by these submissions are provided in section 4 of this report.

4.35 35 – Gary Fitzgerald

4.35.1 Submission – Phibsborough and adjacent streets

The submission is made on behalf of Shadowmill Ltd and as a resident of Cherrymount Park.

The submission objected to traffic management proposals on Charleville Road, Monck Place, Annamoe Road and Annamoe Terrace. The submission requested an oral hearing and raised the following issues:

1. Lack of public consultation on proposed traffic management measures

2. Increase in traffic flows and associated safety and journey time impacts
3. Cabra Road / North Circular Road Junction (@ St Peter's Church)
4. Road Traffic and Roads Bill 2021
5. Supports the submission of the Rathdown Road, Charleville Road and Cherrymount Park Residents Association and Senator Marie Sherlock of the Labour Party

4.35.2 Response to submission

Detailed responses to the issues raised in this submission are provided in sections 2.5.3 and 2.10.2 of this report.

The NTA notes the support for the submissions of Rathdown Road, Charleville Road and Cherrymount Park Residents Association and Senator Marie Sherlock. Detailed responses to the issues raised by these submissions are provided in section 4 of this report.

4.36 36 – Senator Mary Fitzpatrick

4.36.1 Submission – Various

The submission welcomed the provision of a more frequent, reliable, affordable and environmentally efficient public transport. However, the submission raised the following issues:

1. Alternative measures (park and ride facilities)
2. Impact on Prussia Street, Manor Street and Stoneybatter
3. Old Cabra Road Bus Gate
4. Increased traffic flows and associated safety and journey time impacts
5. Parking restrictions on Skreen Road
6. The submission stated that double yellow lines on Skreen Road will have significant impact on a street that has elderly residents and limited off street parking
7. Footpath width
8. Loss and provision of trees

4.36.2 Response to submission

Detailed responses to the issues raised in points 1 to 4, 6 and 7 of this submission are provided in sections 2.10.2, 2.4.3, 2.3.3, 2.5.3 and 2.2.3.

5. Parking restrictions on Skreen Road

The Proposed Scheme is not proposing any additional double yellow lines greater than the extent that currently exists on Skreen Road at the junction with the Navan Road.

4.37 37 - Philomena Fortune

4.37.1 Submission – Navan Road

The submission raised the following issues:

1. Loss and provision of trees
2. Removal of Ashtown Roundabout
3. Consultation process

4.37.2 Response to submission

Detailed responses to the issues raised in this submission are provided in sections 2.2.3 and 2.10.2 of this report.

4.38 38 - Brian Foley & Lorraine Rowland

4.38.1 Submission – Phibsborough and adjacent streets & Old Cabra Road

The submission acknowledged the need for measures to mitigate ‘through traffic’ in the area, with consequences for some local inconvenience e.g. access to Monck Place. However, the submission raised concerns regarding the proposed traffic management measures on Charleville Road and the restriction on turning right from Phibsborough Road to Monck Place. The submission raised the following issues:

1. Increased traffic flows and associated safety and journey time impacts
2. Old Cabra Road Bus Gates

4.38.2 Response to submission

Detailed responses to the issues raised by this submission are provided in sections 2.5.3 and 2.3.3 of this report.

4.39 39 – Miriam Gill

4.39.1 Submission – Phibsborough and adjacent streets & Stoneybatter and adjacent streets

The submission objected to the proposed changes in the Phibsborough and Stoneybatter area. The submission requested an oral hearing and raised the following issues:

1. Increased traffic flows and associated safety and journey time impacts
2. Air quality
3. NTA should facilitate change to low-carbon society

The submission noted that Dublin City Council Climate Action Plan 2019-2024 (CCPA) states that the effects of climate change are already impacting Dublin City at a significant rate and stated that the NTA should be enabling the changes for a low-carbon society such as e-charging infrastructure.

4. Cabra Road / North Circular Road Junction (@ St Peter’s Church)
5. Consultation process
6. Planning documentation
7. Noise pollution (Charleville Road)
8. Site Notice on Charleville Road
9. Lack of public consultation on proposed traffic management measures
10. Increase in traffic flows and associated safety impacts
11. Failure to use appropriate baseline modelling
12. Flawed classification system

4.39.2 Response to submission

Detailed responses to the issues raised by points 1, 2 and 4 to 12 of this submission are provided in sections 2.5.3 and 2.10.2 of this report.

3. NTA should facilitate change to low-carbon society

Section 8.8 of Chapter 8 Climate of Volume 2 of the EIAR states the following:

2The Proposed Scheme will facilitate a resilient, accessible public transport and cycling network providing an attractive alternative to private car travel, encouraging more passenger travel by sustainable modes while providing a better quality of life for citizens.

The improvements to sustainable modes provision as a result of the Proposed Scheme will facilitate a reduction in congestion, reduced greenhouse gas (GHG) emissions and associated air quality improvements along the Proposed Scheme, resulting in enhanced community wellbeing. The delivery of the Proposed Scheme will also aid in contributing to 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) (DCCA 2021).

Investments in high quality public transport infrastructure and systems have been proven to result in significant modal shift. Indeed, in Dublin the Canal Cordon Report (NTA 2019) outlined that in 2019 (prior to Covid-19 restrictions) travel by sustainable modes accounted for 72% of all trips into Dublin City, compared to 59% in 2010.

This positive improvement in sustainable mode uptake was facilitated by investment in walking, cycling and bus infrastructure, Luas Cross City and the re-opening of the Phoenix Park Tunnel in addition to investments in systems such as Leap Card and Real Time Passenger Information (RTPI).

Potential climate impacts associated with the Construction Phase of the Proposed Scheme assessed, included temporary activities such as utility diversions, road resurfacing and road realignments. Construction access routes are also assessed for this phase of the works.

Potential climate impacts associated with the Operational Phase of the Proposed Scheme took into account predicted changes in traffic flows along the Proposed Scheme, reallocation of road space for sustainable modes and potential for displaced traffic flows. In addition, an assessment of the Proposed Scheme in relation to its vulnerability to climate change has been undertaken.”

Section 9.4.4.1.1.4 of Chapter 9 of Volume 2 of the EIAR states:

“The NTA forecast for the year 2028 is 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.”

4.40 40 – Thomas Good

4.40.1 Submission – Navan Road and Old Cabra Road

The submission welcomed the Proposed Scheme and road upgrades, however raised the following issues:

1. Removal of Ashtown roundabout
2. Removal and provision of trees
3. Quality and location of proposed cycle tracks
4. Old Cabra Road Bus Gates
5. Alternative Route Options
6. Consultation process

4.40.2 Response to submission

This submission was also made in response to the CPO relating to the proposed acquisition of land from the premises. Detailed responses to the issues raised are provided in section 3.2.13 of this report.

4.41 41 – Declan and Judith Hannigan

4.41.1 Submission – Phibsborough and adjacent streets

The submission welcomed proposals on Navan Road and Stoneybatter, including the introduction of segregated cycle lanes, along with widening of footpaths and improvements to public realm at Stoneybatter. However, the submission objected to the traffic management measures to be implemented outside of the Core Bus Corridor route. The submission requested an oral hearing and raised the following issues:

The submission raised the following issues:

1. Lack of public consultation on proposed traffic management measures
2. Increases in traffic flows and associated safety and journey time impacts
3. Use of appropriate baseline modelling
4. Flawed classification system

4.41.2 Response to submission

Detailed responses to the issues raised in this submission are provided in section 2.5.3 and 2.10.2 of this report.

4.42 42– Michael Hannon

4.42.1 Submission – Various

The submission acknowledge support for the Navan Road Community Council in their efforts to make the Proposed Scheme a success for their area and raised the following issues:

1. Support for the Proposed Scheme
2. Removal and provision of trees
3. Consultation process
4. Traffic impact
5. Carbon emissions
6. Alternative measures (park and ride facilities)
7. Restriction of vehicular traffic

The submission called for a system to curtail and enforce a reduced number of vehicles into the city.

8. Old Cabra Road Bus Gates
9. Castleknock Road / Blackhorse Avenue junction
10. Castleknock Road

The submission noted that the Castleknock Road between Ashtown Gate and Navan Road / Ashtown Road junction is not fit for purpose and recommended that the existing footpath should be widened and the road support one-way traffic only.

11. Removal of Ashtown Roundabout
12. Accommodation works

4.42.2 Response to submission

Detailed responses to points 1 to 6 and 9 to 12 of this submission are provided in sections 2.2.3, 2.10.2, 2.3.3, and 2.8.3 of this report.

7. Restriction of vehicular traffic

Section 6.4.6.2.8.9 of Chapter 6 Traffic and Transport of Chapter 6 of Volume 2 of the EIAR states:

“Overall, it has been determined that the impact of the reduction in general traffic flows along the Proposed Scheme will be Positive, Significant and Long-term whilst the impact of the redistributed general traffic along the surrounding road network will be Negative, Slight and Long-term.

It should be noted that while Significant effects have been identified, these are at a small number of individual junctions, and effects will be short-lived and localised. This level of congestion is acceptable according to national guidance.

Section 3.4.2 of DMURS (2019) recognises that a certain level of traffic congestion is an inevitable feature within urban networks and that junctions may have to operate at saturation levels for short periods of time during the peak hours of the day. Chapter 1 of the Smarter Travel Policy Document also acknowledges that it is not feasible or sustainable to accommodate continued demand for car use. It should therefore be considered that the traffic congestion that is outlined in the impact assessment is acceptable with regard to the urban location of the area and in the context of the increased movement of people overall and by sustainable modes in particular. Therefore, the proposed impacts are considered acceptable when considered against the Scheme Objectives.

Given that the redistributed traffic will not lead to a significant deterioration of the operational capacity on the surrounding road network, no mitigation measures have been considered to alleviate the impact outside of the direct study area.”

8. Castleknock Road

The aim of the Proposed Scheme is to provide enhanced walking, cycling and bus infrastructure on this key access corridor in the Dublin region. While it would be desirable to improve adjacent streets as well, traffic management measures have only been introduced where required to minimise impacts on side roads. A reduction in traffic flow is forecasted at AM and PM peak hour on this adjacent road as a result of the Proposed Scheme.

4.43 43 – Lorraine Hester

4.43.1 Submission – Old Cabra Road & Phibsborough and adjacent streets

The submission raised the following issues due to the proposed traffic management changes on Annamoe Road, Charleville Road and Monck Place:

1. Old Cabra Road Bus Gates (higher traffic volumes on Cabra Road /Dalymount Road)
2. Air quality and noise pollution
3. Safety
4. Cabra Road / North Circular Road Junction (@ St Peter’s Church)

4.43.2 Response to submission

Detailed responses to the issues raised in this submission are provided in section 2.2.3 and 2.5.3 of this report.

4.44 44 - John Higgins

4.44.1 Submission - Phibsborough and adjacent streets & Old Cabra Road

The submission raised the following issues:

1. Increased traffic flows and associated safety and journey time impacts
2. Old Cabra Road Bus Gate

4.44.2 Response to submission

Detailed responses to the issues raised in this submission are provided in section 2.5.3 and section 2.3.3 of this report.

4.45 45 – John Hiney

4.45.1 Submission – Navan Road

The submission is made on behalf of Kempton Residents Association. The submission requested an oral hearing and noted the following issues:

1. Kempton Avenue Junction
2. Removal of Ashtown Roundabout
3. Old Cabra Road Bus Gates
4. Road safety
5. Removal and provision of trees
6. Bus journey time and reliability

4.45.2 Response to submission

Detailed responses to the issues raised by this submission are provided in sections 2.2.3, 2.3.3, and 2.10.2 of this report.

4.46 46 – Patricia Hughes

4.46.1 Submission – Phibsborough and adjacent streets

The submission welcomed proposals on Navan Road and Stoneybatter, including the introduction of segregated cycle lanes, along with widening of footpaths and improvements to public realm at Stoneybatter. However, the submission objected to the traffic management measures to be implemented outside of the Core Bus Corridor route, due to the impact on Connaught Street and surrounding communities.

The submission requested an oral hearing and raised the following issues:

1. Planning documentation
2. Lack of public consultation on proposed traffic management measures
3. Increase in traffic flows and associated safety and journey time impacts
4. Use of appropriate baseline modelling
5. Flawed classification system
6. Inadequate referencing and lack of consistency in documentation
7. Discrepancies in drawings
 - Charleville Road
 - Annamoe Terrace and Road
8. Cabra Road / North Circular Road junction (@ St Peter's Church)
9. Cumulative impacts
10. Data Collection
 - Traffic and Transportation
 - Air Quality

- Noise and Vibration
- Road Safety Audits

4.46.2 Response to submission

Detailed responses to the issues raised by this submission are provided in sections 2.10.2 and 2.5.3 of this report.

4.47 47 – Hilary Humphreys

4.47.1 Submission – Phibsborough and adjacent streets

The submission objected to the proposed right turn ban from Monck Place onto North Circular Road and the proposed traffic management measure on Charleville Road and raised the following issues:

1. Cabra Road / North Circular Road Junction (@ St Peter’s Church)
2. Increase in traffic flows and associated safety and journey time impacts

4.47.2 Response to submission

Detailed responses to the issues raised by this submission are provided in section 2.5.3 of this report.

4.48 48 – Orla Jones

4.48.1 Submission – Phibsborough and adjacent streets

The submission welcomed proposals on Navan Road and Stoneybatter, including the introduction of segregated cycle lanes, along with widening of footpaths and improvements to public realm at Stoneybatter.

However, the submission objected to the traffic management measures to be implemented outside of the Core Bus Corridor route, due to the impact on Connaught Street and surrounding communities.

The submission requested an oral hearing and raised the following issues:

1. Planning documentation
2. Lack of public consultation on proposed traffic management measures
3. Increase in traffic flows and associated safety and journey time impacts
4. Use of appropriate baseline modelling
5. Flawed classification system
6. Inadequate referencing and lack of consistency in documentation
7. Discrepancies in drawings
 - Charleville Road
 - Annamoe Terrace and Road
8. Cabra Road / North Circular Road junction (@ St Peter’s Church)
9. Cumulative impacts
10. Data Collection
 - Traffic and Transportation
 - Air Quality
 - Noise and Vibration

- Road Safety Audits

4.48.2 Response to submission

Detailed responses to the issues raised by this submission are provided in sections 2.10.2 and 2.5.3 of this report.

4.49 49 – Dalen Kambur & Helen Whelan

4.49.1 Submission- Phibsborough and adjacent streets

The submission objected to the traffic management proposals in Phibsborough and raised the following issues:

1. Increase in traffic flows and associated safety and journey time impacts
2. Lack of public consultation on proposed traffic management measures

4.49.2 Response to submission

Detailed responses to the issues raised by this submission are provided in section 2.5.3 of this report.

4.50 50 – Niall and Antoinette Kavanagh

4.50.1 Submission – Navan Road

The submission raised the following issues:

1. Loss of driveway use during works
2. Permanent loss of driveway space
3. Alternative proposals

The submission ended with the authors supporting the opportunity to present their case at any potential oral hearing.

4.50.2 Response to submission

This submission was also made in response to the CPO relating to the proposed acquisition of land from the premises. Detailed responses to the issues raised have been provided in section 3.2.17 of this report.

4.51 51 – Frank Keane

4.51.1 Submission – Phibsborough and adjacent streets

The submission objected to the proposals on Charleville Road and raised the following issues:

1. Consultation process
2. Site notice on Charleville Road
3. Air quality
4. Noise pollution
5. Increased traffic flows and associated safety and journey time impacts
6. Data collection
7. Planning documentation
8. Use of electric cars

The submission stated that the NTA should be incentivising use of electric cars with a nationwide network of charging points.

4.51.2 Response to submission

Detailed responses to the issues raised in points 1 to 7 of this submission are provided in sections 2.10.2 and 2.5.3 of this report.

8. Use of electric cars

The incentivisation of the use of electric cars and provision of associated charging points is not in the remit of the NTA. However, the NTA is responsible for the upgrade of the public transport bus fleet and as noted in section 9.4.4.1.1.4 of Chapter 9 of Volume 2 of the EIAR:

“The NTA forecast for the year 2028 is 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.”

4.52 52 – Orla Keane

4.52.1 Submission – Phibsborough and adjacent streets & Old Cabra Road

The submission noted support for improvements to public transport and cycling facilities, however the submission raised concern about the traffic management proposals in the Phibsborough area.

The submission requested an oral hearing and noted the following issues:

1. Increased traffic flows and associated safety and journey time impacts
2. Cabra Road Bus Gates
3. Planning documentation
4. Use of appropriate baseline modelling
5. Flawed classification system
6. Lack of public consultation on proposed traffic management measures

4.52.2 Response to submission

Detailed responses to the issues raised by this submission are provided in sections 2.5.3, 2.3.3 and 2.10.2 of this report.

4.53 53 – Anne Marie Kiernan

4.53.1 Submission – Phibsborough and adjacent streets

The submission noted the benefits of the Proposed Scheme for pedestrians and cyclists in the Stoneybatter area, and for those using the bus service. However, the submission objected to the proposed traffic management measures to be implemented outside of the Core Bus Corridor route, due to the impacts on the surrounding communities.

The submission requested an oral hearing and raised the following issues:

1. Lack of public consultation on proposed traffic management measures
2. Increase in traffic flows and associated safety and journey time impacts
3. Cabra Road / North Circular Road junction (@ St Peter’s Church)
4. Use of appropriate baseline modelling
5. Flawed classification system

4.53.2 Response to submission

Detailed responses to the issues raised by this submission are provided in section 2.5.3 and 2.10.2 of this report.

4.54 54 – Déirdre Kirwan

4.54.1 Submission – Navan Road

The submission expressed concern with the impact on their home and the environment and raised the following issues:

1. Change in travel demand and patterns of travel due to COVID-19 pandemic
2. Impact on the natural environment
3. Loss of privacy
4. Noise and vibration.

4.54.2 Response to submission

This submission was also made in response to the CPO relating to the proposed acquisition of land from the premises. Detailed responses to the issues raised are provided in section 3.2.18 of this report.

4.55 55 – Anna Lalor

4.55.1 Submission – Navan Road

The submission raised the following issues:

1. Loss and provision of trees
2. Signage at Ashtown junction

The submission affirmed that Rathborne, Royal Canal Park and Ashtown Train Station should be included on the directional signage
3. Increase in traffic and speed limit on Skreen Road
4. Removal of Ashtown Roundabout
5. Castleknock Road / Blackhorse Avenue Junction

4.55.2 Response to submission

Detailed responses to the issues raised in points 1, 4 and 5 of this submission are provided in section 2.2.3 and 2.8.3 of this report.

2. Signage at Ashtown junction

The proposed directional signage on approach to the Ashtown junction will match existing signage, i.e., Cavan, Navan, City Centre, Castleknock and Phoenix Park.

3. Increase in traffic and speed limit on Skreen Road

A detailed response on the forecasted traffic figures for Skreen Road is provided in section 2.2.3.1 of this report. Skreen Road does not fall within the scheme boundary and as such altering the speed limit is outside the scope of the Proposed Scheme.

4.56 56 – Kevin Lawler

4.56.1 Submission – Mill Road

The submission stated that the nature of the proposed works and proximity to 1 Herbert Road, Blanchardstown will result in the following issues for the property:

1. Visual amenity

The submission noted concerns in relation to the visual impact of the scheme due to the widening of the N3 and the new pedestrian infrastructure that connects Mill Road to the proposed bus stop on the N3.

The submission stated that the works will require removal of planting and vegetation from the embankment to the rear of the property along with the relocation of the noise barrier. The submission stated the proposed works will result in the vegetation and relocated noise barrier being located approximately 5m closer to the property. The submission suggested that this will result in an overbearing impact with the rear garden appearing “more cramped” than at present.

The submission also stated that in the absence of more detailed drawings there are concerns about the visual impact that the pedestrian ramps and steps will have on the wider Mill Road streetscape.

2. Noise and vibration

The submission stated that noise levels are considered a direct impact as a result of the Proposed Scheme. The submission stated that it is unclear whether internal and external noise levels at the property will remain compliant with the relevant standards as set out in BS 8233:2014 ‘Guidance on Sound Insulation and Noise Reduction for Buildings’ and the associated provisions of both ProPG: Planning & Noise Professional Practice Guidance on Planning & Noise New Residential Development (2017) and the Dublin Agglomeration Environmental Noise Action Plan (2018-2023).

The submission affirmed that due to the boundary moving approximately 5m closer and the elevated level of the N3 relative to the property, this will result in a permanently increased noise impact.

The submission stated that the property will also be impacted by increased vibrations arising from vehicular movements, as a result of the N3 moving closer to the property.

3. Lighting

The submission noted that there is no change in the quantum or type of street lighting within the immediate vicinity of the property. However, the submission stated that the property will be impacted by severe light pollution in the interim period between the removal of existing vegetation and the full growth of the replacement vegetation. The submission affirmed that this will result in light pollution to all surrounding properties and could be detrimental to wildlife. The submission also suggested that this could compromise the health and wellbeing of the residents.

The submission suggested that the increase in noise, vibration and light could compromise the health and wellbeing of the residents.

4. Development Plan Policy

The submission stated that the property is zoned under both the current Fingal Development Plan 2017 - 2023 and the Draft Fingal Development Plan 2023-2029 as RS ‘Residential’. This zoning provides the following objectives which must be considered for any development on/adjointing such sites:

‘Provide for residential development and protect and improve residential amenity’

‘that any new development in existing residential areas has minimal impact on existing amenity’

The submission suggested that the Proposed Scheme will have a significant impact on the residential amenity of the property by virtue of undue visual impact, noise and vibration and light pollution. It is therefore considered that the scheme is non-compliant with the RS ‘Residential’ zoning objective.

The submission also considered that the scheme is non-compliant with the following objectives of the Fingal Development Plan 2017-2023:

- **Objective LP01** - Require that the design of lighting schemes minimises the incidence of light spillage or pollution into the surrounding environment. New schemes shall ensure that there is no unacceptable adverse impact on neighbouring residential or nearby properties; visual amenity and biodiversity in the surrounding areas.
- **Objective DMS86**- Ensure boundary treatment associated with private open spaces for all residential unit types is designed to protect residential amenity and visual amenity.
- **Objective NP03** - Require all developments to be designed and operated in a manner that will minimise and contain noise levels.
- **Objective NP04** – Ensure that future developments are designed and constructed to minimise noise disturbance and take into account the multi-functional uses of streets including movement and recreation as detailed in Urban Design Manual (2009) and the Design Manual for Urban Roads and Streets (2013).
- **Objective NP05** – Ensure that development complies with the NRA’s design goal for sensitive receptors exposed to road traffic noise or as updated by any subsequent guidelines published by Transport Infrastructure Ireland.

5. Property value

The submission stated that the associated visual, noise, vibration and light impacts will lead to a loss in the value of numerous properties in the immediate area.

6. Mitigation and Compensation

The submission stated that the NTA should engage directly with the resident of the property in relation to identifying appropriate mitigation measures. In the absence of comprehensive mitigation measures to prevent undue visual, vibrations, lighting and noise impacts, compensation to offset the potential impacts should be given.

4.56.2 Response to submission

1. Visual amenity

It is noted that the proposed edge of carriageway location will remain largely unchanged from its existing location over the extent of 1 Herbert Road.

The noise barrier will be relocated towards the property to facilitate the line of the widened Mill Road bridge parapet and associated safety barrier.

Section 17.4.3.1.2 of Chapter 17 Landscape and Visual of Volume 2 of the EIAR states the following:

“The pedestrian ramps will be constructed to provide access between Mill Road and new bus stops on the N3 dual carriageway. Pedestrian ramps will be constructed to the north of the N3 (RW07-B) within open space at Tolka Valley and to the south of the N3 (RW07-A) within open space adjacent to Millstead. The works will require partial removal of groups of mature trees and young trees and vegetation at both locations and substantial changes to the existing open space at Millstead including a reduction of screening vegetation bordering the N3 and provision of replacement planting. The Construction Phase will necessitate temporary land acquisition from 2no. residential properties. The Proposed Scheme also includes for provision of a construction compound (Compound BL2) in landscape area in the junction between N3 Navan Road and Access to Junction 6 Health and Leisure Centre. The construction works will not alter the overall townscape character along this section of the Proposed Scheme but there will be substantial localised changes to streetscape character particularly at Mill Road. The magnitude of change in the baseline environment is high. The potential townscape / streetscape effect of the Construction Phase is assessed to be Negative, Moderate and Temporary / Short-term.”

Section 17.4.4.1.2 of Chapter 17 Landscape and Visual of Volume 2 of the EIAR states the following:

“The Operational Phase of the Proposed Scheme involves changes primarily to Mill Road / N3 overbridge area with provision of ramp and step access to Mill Road via Tolka Valley Park and open space adjacent to Millstead and localised changes to sections of road boundary. Trees will be lost during the Construction Phase, and the effect of this permanent loss will also be experienced during the Operational Phase. However, some replacement / compensatory planting will be provided which will reduce effects over the long-term. The Proposed Scheme will not alter the overall townscape / streetscape character along this section of the Proposed Scheme. The baseline townscape is of low sensitivity. The magnitude of change in the baseline environment is medium. The potential townscape / streetscape effect of the Operational Phase is assessed to be Negative, Slight and Short-term, becoming Neutral, Slight, Long-Term.”

Section 17.4.4.2.9 of Chapter 17 Landscape and Visual of Volume 2 of the EIAR states the following:

“A number of trees will have been removed during the Construction Phase but the Operational Phase of the Proposed Scheme will not impact directly on any additional trees. However, the effect of loss of these trees from the townscape / streetscape will continue to be experienced in the Operational Phase until the point that replacement planting, if provided at similar locations and quantities, is established to a similar degree of maturity as the removed trees. There will be substantial replacement or compensatory planting where practicable, however some areas of the townscape / streetscape will be left with reduced numbers of trees, most notably at Mill Road and along Navan Road. Sensitivity is high. The magnitude of change is medium / high.

The potential townscape and visual effect of the Operational Phase on trees and plantings is assessed to be Negative, Moderate / Significant and Short-Term becoming Negative, Moderate, Long-term.”

2. Noise and vibration

Section 9.4.4.1.1.5 of Chapter 9 of Volume 2 of the EIAR for the Opening Year 2028 states the following:

“The assessment of potential traffic noise impacts has been undertaken using the following approach:

- *Traffic noise levels have been calculated along each road within a 1km study area of the Proposed Scheme*
- *Noise levels have been calculated for the Do Minimum scenario for the opening year, 2028*
- *Noise levels have been calculated for the Do Something scenario for the opening year, 2028*
- *The change in traffic noise levels between the Do Minimum and Do Something scenarios for the year 2028 has been calculated and the associated magnitude of change (table 9.15) and noise level range (table 9.17).”*

As noted on Figure 9.4 (Opening year 2028) of Volume 3 of the EIAR, the traffic noise impact is assessed as Imperceptible / Positive along the N3 adjacent to the property, as a result of the Proposed Scheme.

Section 9.4.4.1.1.5 of Chapter 9 for the Design year 2043 states the following:

“For the design year, the assessment of potential traffic noise impacts has been undertaken using the following approach:

Traffic noise levels have been calculated along each road within a 1km study area of the Proposed Scheme

- *Noise levels have been calculated for the Do Minimum scenario for the opening year, 2028*
- *Noise levels have been calculated for the Do Something scenario for the design year, 2043*

- *The non-project noise change has been calculated between the Do Minimum design year 2043 and the Do Minimum opening year, 2028, to account for other projects and transport strategies between these assessment years*
- *The change in traffic noise levels between the 2028 Do Minimum and the Do Something scenario for the year 2043 has been calculated, accounting for any variation in Do Minimum traffic flows between the year of opening and design year. The associated magnitude of change (table 9.16) and noise level range (table 9.17) has been defined.”*

As noted on figure 9.5 (Design year 2043) of Volume 3 of the EIAR, the traffic noise impact is assessed as Imperceptible / Positive adjacent to the property, as a result of the Proposed Scheme.

As noted in Table 9.59 of Chapter 9 of Volume 2 of the EIAR, the predicted impact on Vibration as a result of the Proposed Scheme is Neutral, long-term.

3. Lighting

The lighting columns along the N3 to the rear of the property, which have a cranked arm towards the carriageway, are designed to direct the light onto the carriageway.

In addition, section 4.6.12.1 New Lighting in Chapter 4 of Volume 2 of the EIAR states the following:

“New low level lighting will be incorporated into the pedestrian ramps at Mill Road. It is anticipated that the new low level lighting either integrated into the handrails or another part of the structure. Lighting levels will be under 3 lux which will result in extremely limited light spill.”

4. Development Plan Policy

With respect to **Objective LP01**, as noted in point 3 above, street lighting is designed to be directed onto the carriageway, and low level lighting will be introduced to the pedestrian ramps.

In addition, as noted in section 12.4.4.4.1 of Chapter 12 Biodiversity of Volume 2 of the EIAR:

“There are a total of two proximal areas where new low-level lighting is proposed in previously dark / low lighting areas i.e. BR02 Mill Road Bridge and RW07A&B Pedestrian Ramps. There may be disruption to potential commuting foraging routes across existing woodland habitats adjacent to the Tolka_040. However, considering that the N3 is already artificially lit, bats are more likely to be foraging at a greater distance from the road as woodland habitat (free from lighting) is plentiful to the north-east of the Proposed Scheme at this location. Furthermore, it is expected that bats utilizing this edge habitat would be habituated to some degree of artificial lighting. Therefore, the overall effect of artificial lighting on bats during operation is considered to be significant at the local level only.

Mitigation measures to avoid light spill are included in the design and detailed in section 12.5.”

With respect to Objective DMS86, there is no impact on the boundary treatment of the property and no works are proposed to the boundary treatment.

With respect to Objective NP03, Objective NP04 and Objective NP05, and as noted in point 2 above, the traffic noise impact is assessed as Imperceptible / Positive adjacent to the property, as a result of the Proposed Scheme.

5. Property value

The assessed impact as a result of visual, noise, vibration and lighting are noted above. The submission stated that the associated visual, noise, vibration and light impacts will lead to a loss in the value of numerous properties in the immediate area.

6. Mitigation and Compensation

As a result of the assessed impact on the property, no mitigation measures are proposed. In addition, as the property is not included within the Blanchardstown to City Centre Core Bus Corridor Scheme Compulsory Purchase Order, there is no compensation required.

4.57 57 – LCC Properties

4.57.1 4.57.1 Submission – Old Cabra Road

The submission noted the impact of the proposed bus gates on the long-term viability of the Go Station located on Old Cabra Road as stated in Chapter 10 of Volume 2 of the EIAR:

The bus gate on part of Old Cabra Road is located in the community area of Aughrim Street. There is one business located along the bus gate, Go Station (filling station). Go Station is expected to be affected as a result of the proposed bus gate. Although this business can still be accessed by private vehicles, these will primarily be local residents in the surrounding community area and customers with existing knowledge of the location of the business. The primary source of income for the business is expected to be from passing trade, which is expected to be significantly reduced along Old Cabra Road due to the bus gates. During construction and operation of the Proposed Scheme it is expected that this business would no longer be able to operate successfully. The impact on this business is assessed as Negative, Very Significant and Long-Term during construction and operation of the Proposed Scheme.

The submission pointed out the erroneous reference to Go Station being on Aughrim Street.

It went on to state that they are highly concerned with the proposed impact on the business and requested the omission of the following bus gates:

- Navan Road / Old Cabra Road Junction
- Old Cabra Road Railway Overbridge
- Aughrim Street / Manor Street Junction

The submission stated that the Go Station is located on the southern side of Old Cabra Road and extends to approximately 975 m² and consists of an unmanned service station with ancillary services. The site has a frontage of approximately 43m and was specifically identified as a key opportunity site for the development of a service station due to the significant vehicular movements passing the site. The submission noted that the site was purchased by Lissan Coal Company (Ireland) Limited in February 2016.

The submission stated that the proposed bus gates present a “catastrophic impact” on the commercial viability of the site.

1. Site Planning History

The submission noted that the planning permission for the new service station was granted by Dublin City Council in January 2018. The submission also noted that as a result of a third party appeal, An Bord Pleanála considered the appeal and granted planning permission in January 2019.

The submission also noted that a planning application was lodged in July 2022 for retention of alterations to the development.

2. Financial Investment

The submission stated that a multi-million euro investment has been made into the development, which has been wholly based on the extent of due diligence carried out in respect of the site. The submission noted that the due diligence consisted of traffic assessment and modelling, which identified that the site would represent a highly lucrative location for the service station.

The submission stated that the station is of noteworthy aesthetic quality and represents a significant improvement to the previous commercial property on the site.

The submission also stated that the bus gates would result in the need to invest further capital to undertake due diligence for an alternative site with planning, design, construction costs with associated finance costs.

The submission noted that the owner would suffer significant financial losses as a result of the Proposed Scheme.

3. Consideration of Alternatives

The submission noted that as a result of a review of Chapter 3 Consideration of Reasonable Alternatives of Volume 2 of the EIAR, it is contended that there is an inadequate level of consideration given to alternative approaches.

4. Statistical Data

The submission stated that an Impact Report was prepared to determine the negative impact on the Go Station as a result of the Proposed Scheme. It is noted that this report shows that the average daily count will drop from 1727 to 138, a 92% reduction as a result of the proposed scheme. The submission stated that no advertisement of the station has yet occurred to allow for expansion of its customer base.

The submission went on to state that the Impact Report also compares the impact on the Go Station against eight other businesses along the proposed CBC.

5. Interference with Property Rights

In the submission, it is suggested that the nature and extent of the interference occasioned by 3 bus gates included as part of the Proposed Scheme, on the “Go Station” located at 87 Cabra Road, owned by LCC Properties & Investments (Ireland) Limited and operated by Lissan Coal Company Ireland Limited represents an unjust attack on the private property rights of both the owner and the operator.

Both the owner and operator of the Go Station suggest that the extent of interference on the Go Station is completely disproportionate relative to the objective to be achieved.

The submission raises a number of issues and relies on certain caselaw in support of its position which are summarised and responded to in section 4.57.2 Response to submission below.

6. Conclusion

The submission noted that the Service Station was established in good faith and will see its customer base reduce by up to 95.5%. Thus, the submission reiterated their request to remove the proposed bus gates from the scheme.

The submission requested engagement with the NTA, Arup and An Bord Pleanála at an oral hearing to discuss the significant, adverse and irreversible impact that the proposed scheme will have on their business.

4.57.2 Response to submission

Response Overview

- Corridor options for the Blanchardstown to City Centre Core Bus Corridor Scheme were evaluated using a sifting process and multi-criteria assessment (MCA), with the route along Old Cabra Road, Prussia Street and through Stoneybatter identified as the preferred option to deliver the aim and objectives 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. Alternative core bus service and cycling routes that could mitigate impact on the Go Station to the south of Old Cabra Road along St David’s Terrace and Blackhorse Ave, or through Phoenix Park, or to the east and north around Grangegorman and along Cabra Road could not meet the objectives 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 movements over general traffic movements, and to enhance the potential for cycling by providing safe infrastructure for cycling, segregated from general traffic wherever practicable.
- The options assessment completed for the Proposed Scheme demonstrates the criticality of the inclusion of necessary Bus Gates on Old Cabra Road, at Prussia Street /Manor Street/Aughrim Street junction and at Blackhall Place and these three bus gates are fundamental to the entire CBC Scheme to achieve its objectives.

- Adopting a Do-Nothing approach (i.e. no bus gates), to sustainable travel infrastructure improvements, would lead to further traffic congestion and exacerbation of the problems arising from delayed buses and unreliable journey times. The capacity and potential of the public transport system to respond to demand would remain restricted by the existing deficient roadway infrastructure and the resulting sub-standard levels of bus priority and journey-time reliability. As such, in addition to the continuation of issues relating to existing bus services, future bus services, would not have the potential to address growing demand. This would severely impact the attractiveness of public transport as an alternative to private car usage for those who need to travel along the route of the Proposed Scheme.
- The Environmental Impact Assessment Report for the Proposed Scheme has considered and assessed the effects of the Proposed Scheme on the Go Station and has assessed the impact on the Go Station as “Negative, Very Significant and Long-Term during construction and operation of the Proposed Scheme”. The Transport Strategy for the Greater Dublin Area 2016-2035 (“GDA Transport Strategy”) was prepared by the NTA pursuant to Section 12 of the Dublin Transport Authority Act 2008 and approved by the Minister for Transport, Tourism and Sport in February 2016 in accordance with sub-section 12(13) of that Act. In considering the alternative modes (including bus-based transport modes) on a corridor basis, the Strategic Environmental Assessment (SEA) evaluation of the GDA Strategy considered that bus-based projects could contribute towards facilitating the achievement of Ireland’s greenhouse gas emission targets in terms of emissions per passenger per kilometre. BusConnects is included as a specific policy objective of Project Ireland 2040 – The National Development Plan 2018 – 2027, published on 16 February 2018. The Emerging Preferred Route Option for the public consultation for the Blanchardstown to City Centre Core Bus Corridor Scheme was published on 14 November 2018. Ireland declared a climate emergency on 9 May 2019. The first Climate Action Plan was published on 17 June 2019. The Go Station was built in full knowledge of the emerging CBC scheme proposals following a grant of planning permission for the development by An Bord Pleanála in January 2019.
- Insofar as the submission suggests that the owner/operator of the Go Station should have been included in the CPO, such that a right of compensation would have arisen, such a proposition is misplaced. None of the Go Station lands are necessary or required for the Proposed Scheme. The NTA has fully complied with all legislative and statutory requirements (including with its obligations under the EIA Directive and national transposing legislation), and given the importance of the bus gates at this location as part of the Proposed Scheme (as evidenced above), were An Bord Pleanála to approve the Proposed Scheme, there could be no question of any unconstitutional interference with the property rights of either LCC Properties & Investments (Ireland) Limited or Lissan Coal Company Ireland Limited.

Bus Gates

For a description of the proposed bus gates at Old Cabra Road, at Prussia Street / Manor Street / Aughrim Street junction and at Blackhall Place, refer to sections 2.3.1. and 2.4.1. of this report.

Aughrim Street Community area

The extent of Aughrim Street community area is shown on sheet 3 of figure 10.1 of Volume 3 of the EIAR (extract shown in Figure 4.57.1 below). This confirms that the Go Station is within this community area. It is of course acknowledged that the Go station is located specifically on Old Cabra Road, as shown on Figure 4.57.2 below, as extracted from the General Arrangement drawings in Volume 3 of the EIAR.

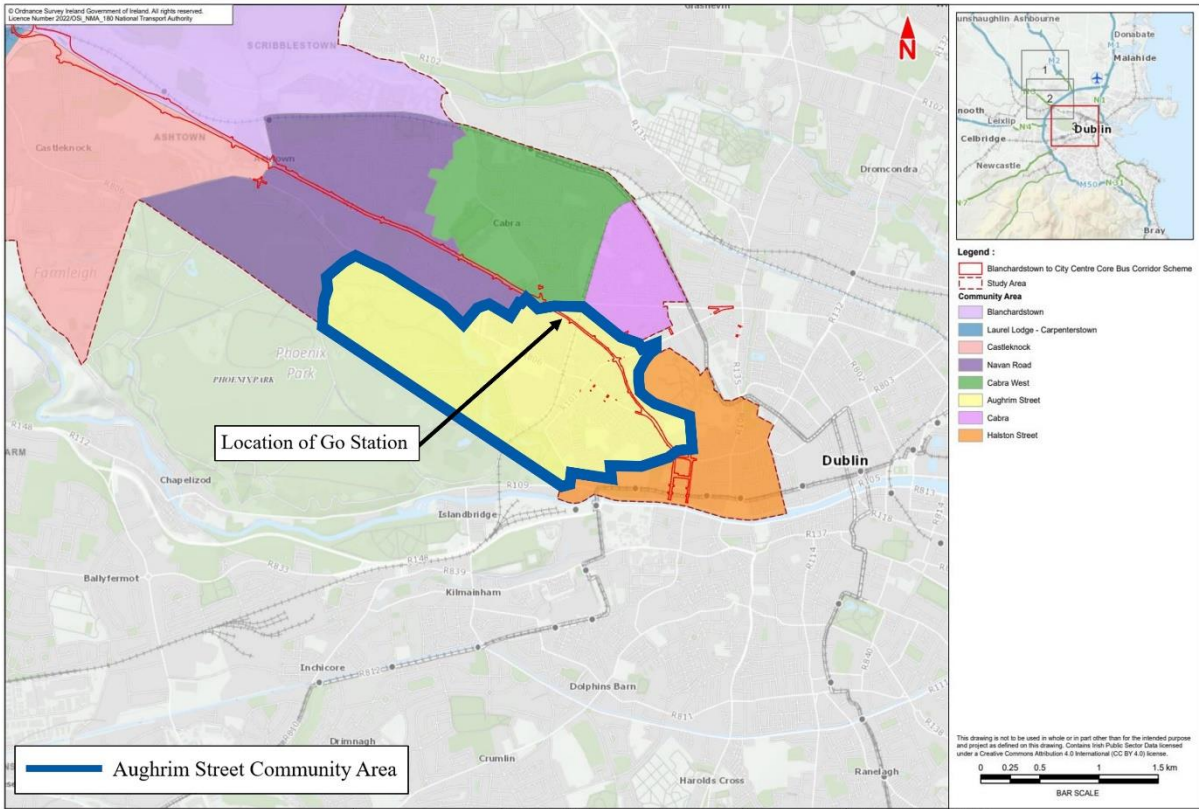


Figure 4.57.1: Community Study Area (extract from Figure 10.1 of Volume 3 of EIAR)

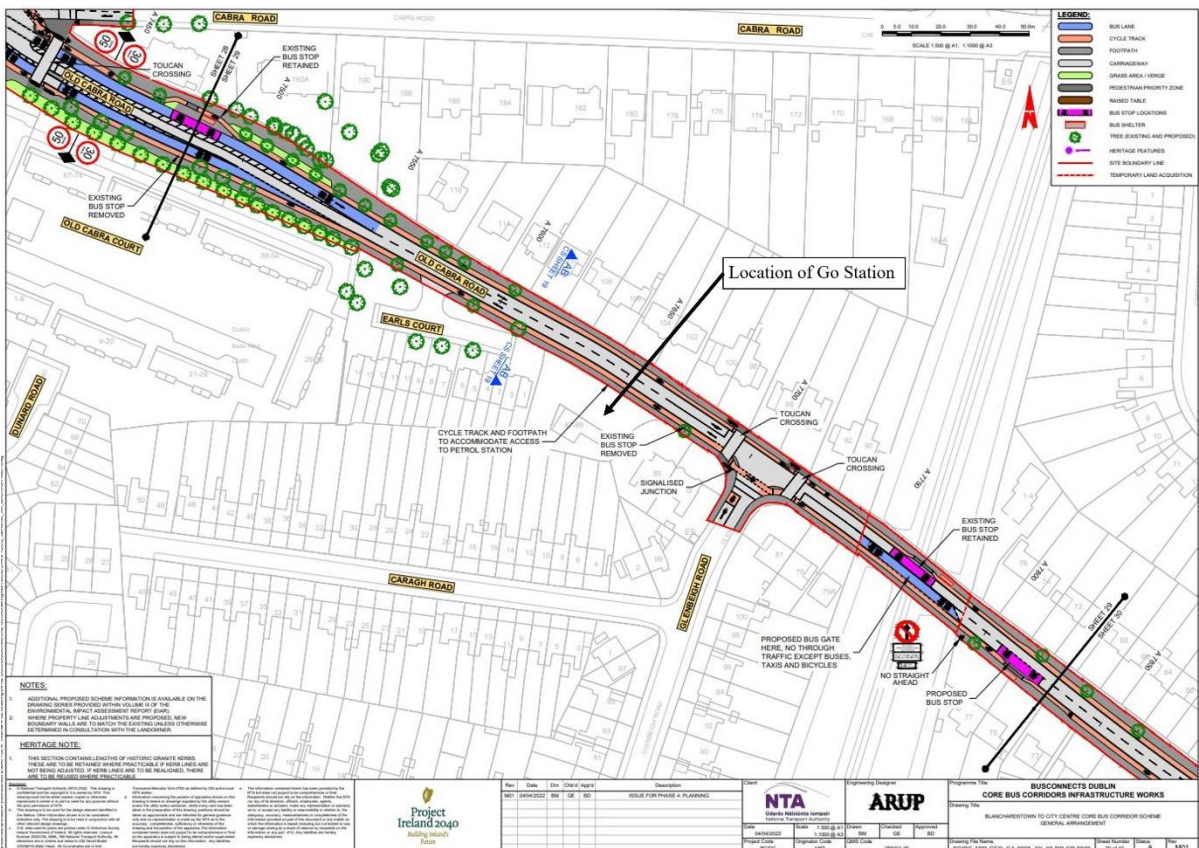


Figure 4.57.2: Go Station Location

Impact on Petrol Station

As noted in the submission as quoted from section 10.4.4.2.2.2 of Chapter 10 of Volume 2 of the EIAR: The impact on this business is assessed as Negative, Very Significant and Long-Term during construction and operation of the Proposed Scheme. This is as a result of the proposed bus gates on Old Cabra Road, at Prussia Street /Manor Street/Aughrim Street junction and at Blackhall Place.

Consideration of Alternatives and Interference with Property Rights

In the submission from LCC Properties & Investments (Ireland) Limited and the submission from Lissan Coal Company Ireland Limited (which are identical), it is suggested that the nature and extent of the interference occasioned by 3 bus gates included as part of the Proposed Scheme, on the “Go Station” located at 87 Cabra Road, owned by LCC Properties & Investments (Ireland) Limited and operated by Lissan Coal Company Ireland Limited represents an unjust attack on the private property rights of both the owner and the operator. That is not the case for the reasons set out below.

It is a basic principle of the law relating to compulsory acquisition that any acquisition of land must be necessary. The Go Station lands are not required for the Proposed Scheme. In the circumstances, there is no requirement, nor justification, for any land acquisition from LCC Properties & Investments (Ireland) Limited (the owner of the Go Station) and/or Lissan Coal Company Ireland Limited (the operator of the Go Station) for the purposes of the Proposed Scheme. Any CPO of these lands in the circumstances would be unnecessary and unjustifiable. Further the NTA would not be acting appropriately or within its powers were it to seek to include in the CPO, lands which are not necessary or required for the Proposed Scheme.

The following outlines the consideration of alternatives and options assessment completed for the Proposed Scheme and highlights the criticality of the introduction of the Bus Gates to the overall objectives of the scheme.

Section 3.2 Strategic Alternatives of Chapter 3 Reasonable Alternatives of Volume 2 of the EIAR states the following:

GDA Transport Strategy

The Transport Strategy for the Greater Dublin Area 2016-2035 (“GDA Transport Strategy”) was prepared by the NTA pursuant to Section 12 of the Dublin Transport Authority Act 2008 and approved by the Minister for Transport, Tourism and Sport in February 2016 in accordance with sub-section 12(13) of that Act.

The GDA Transport Strategy provides a comprehensive framework to guide the development of transport across the Greater Dublin Region over the period of the strategy. Careful consideration was undertaken of the transport requirements across the seven counties of the GDA, and the GDA Transport Strategy then formulated the appropriate transport responses to those requirements. Various studies and reports were undertaken in the development of the GDA Transport Strategy, including:

- *Area-based studies covering the GDA area;*
- *Demand Management Study;*
- *Core Bus Network Study;*
- *Park & Ride Study;*
- *Transport Modelling Analysis; and*
- *Environmental reports.*

Specifically, a Strategic Environmental Assessment (SEA) was undertaken on the GDA Transport Strategy (NTA 2016). As set out in the Environmental Report, in respect of which the SEA of the GDA Transport Strategy was undertaken, a number of reasonable alternative strategies were devised and assessed, taking into account the objectives and the geographical scope of the strategy. The provisions of the GDA Transport Strategy (including bus-based transport modes), were evaluated for potential significant effects, and measures integrated into the Strategy on foot of SEA recommendations in order to ensure that potential adverse effects were mitigated.

In considering the alternative modes on a corridor basis, the environmental assessment undertaken considered that bus-based projects could contribute towards facilitating the achievement of Ireland's greenhouse gas emission targets in terms of emissions per passenger per kilometre.

In addition to direct studies and analyses undertaken as part of the strategy preparation work, the GDA Transport Strategy also took into account prior reports and plans in relation to transport provision. These prior studies included, inter alia, the following:

- *GDA Cycle Network Plan (2013);*
- *Bus Rapid Transit – Core Network Report (2012);*
- *Fingal/North Dublin Transport Study (2015);*
- *Review of the DART Expansion Programme (2015);*
- *Various prior Luas studies (including Line B2 (Bray), Line D1 (Finglas), Line F1, and F2 (Lucan and Liberties), and Line E (2008)); and*
- *Analysis carried out for the 2011 Draft Transport Strategy.*

Given the importance of bus transport as the main public transport mode for the overall region, the delivery of an efficient and reliable bus system forms an important element of the GDA Transport Strategy, integrated appropriately with the other transport modes. As Dublin is a low-density city with a large geographic footprint, there are few areas with the size and concentration of population necessary to support rail based public transport, and the bus system remains essential to serve the needs of much of the region.

The bus system has continued to remain an essential element of the public transport infrastructure since the publication of the GDA Transport Strategy. The bus system in the Dublin metropolitan area carried 159 million passengers in 2019 (the last full year before the COVID-19 pandemic), compared with 48 million passengers on Luas and 36 million passengers on the DART and rail commuter services over the same year. Converting to percentage figures, the bus system accounts for 65% of public transport passenger journeys in the Dublin region, roughly two thirds of all public transport passengers, with Luas carrying 20% and DART and commuter rail services delivering the remaining 15%.

The area-based studies referenced above provided an appraisal of existing and future land use and travel patterns, including identifying trends and issues, within eight transport corridors as presented Image 3.1 (Figure 3.8 in the GDA Transport Strategy) (reproduced as Figure 4.57.3 here). These corridors were also divided into Outer Hinterland, Outer Metropolitan, and Inner Metropolitan areas in terms of character.



Figure 4.57.3: Transport Strategy Corridors

The development of the GDA Transport Strategy took into account the data and analysis provided through the supporting studies and background information and formulated an overall integrated transport system to serve the needs of the GDA up to 2035. In relation to public transport, the GDA Transport Strategy set out a network of heavy rail, metro, light rail and bus proposals, with those networks combining to serve the overall public transport needs of the region.

The Blanchardstown to City Centre Core Bus Corridor Scheme is largely located in Corridor B in the GDA Transport Strategy which extends from the core City Centre area through to Blanchardstown, Dublin’s most populous suburb and the location of strategic employment zones at Ballycoolin, Damastown and the town centre, and onwards towards Navan in County Meath.

‘Do Nothing’ Alternative

The GDA Transport Strategy was developed as the economy was emerging from the post 2008 economic downturn. In turn, the GDA Transport Strategy sets out a number of key challenges and opportunities within the GDA.:

- Suburbanisation and the spread of population, employment and other land uses has continued;
- Arising from the above trend, the mode share of car use continues to increase;
- Car ownership – a key determinant of car use – is likely to increase further, up to saturation levels;

- *Cycling has increased significantly in numbers and in mode share;*
- *Recovery is occurring in public transport use, but not in its mode share;*
- *Encouraging non-car use for trips to education is a significant challenge;*
- *There is no spare capacity on the M50 Motorway;*
- *Protecting and enhancing access to the ports and Dublin Airport is a strategic priority; and*
- *Current economic growth will mean that within the next few years, overall levels of travel demand are likely to exceed the travel demand experienced in 2006 and 2007.*

Congestion throughout the GDA is particularly high with the number of cars on the road increasing and significant daily traffic delays. Without intervention, potential impacts could worsen for the region including:

- *Continued growth of traffic congestion;*
- *Impacts on the ability of the region to grow economically due to increased congestion;*
- *Longer journey times and increased travel stress will diminish quality of life; and*
- *Environmental emissions targets will not be met.*

Ultimately few areas within the GDA have the size and concentration of population to support rail-based public transport. For most transport corridors in Dublin, bus transport represents the most appropriate transport solution.

In terms of the out-workings of a strategic “Do Nothing” Alternative, it should be noted that, currently, the bus network is characterised by discontinuity, whereby corridors have dedicated bus lanes along less than one third of their lengths on average which means that for most of the journey, buses and cyclists are competing for space with general traffic and are negatively affected by the increasing levels of congestion. This lack of segregated space for different road users results in delayed buses and unreliable journey times for passengers. Issues related to frequency, reliability and a complex network have persisted for many years and will continue to do so without further intervention. In the absence of enhanced frequencies, journey time and reliability the ability to attract new passengers is limited, particularly from private car and also impacts on the ability of the bus network to retain passengers and acts as a demotivator to travel by bus. Within the extents of the route of the Blanchardstown to City Centre Core Bus Corridor Scheme, bus lanes are currently provided on approximately 10% and 40% of route outbound and inbound, respectively, of which significant portions of the route are shared with cyclists and or parking lanes, which can in turn impact on bus reliability.

Adopting a Do Nothing approach, to infrastructure improvements, would be likely to result in an exacerbation of the problems arising from discontinuities – such as delayed buses and unreliable journey times.

The capacity and potential of the public transport system would remain restricted by the existing deficient and inconsistent provision of bus lanes and the resulting sub-standard levels of bus priority and journey-time reliability. As such, in addition to the continuation of issues relating to existing bus services, future bus services, including the Bus Network Redesign currently being implemented as part of the wider BusConnects Programme, would also suffer from the same lack of journey-time reliability. This would severely impact the attractiveness of public transport as an alternative to private car usage for those who need to travel to/from various locations along the route of the Proposed Scheme.

In addition, without the provision of safe cycling infrastructure, intended as part of the Proposed Scheme, there would also continue to be an insufficient level of safe, segregated provision for cyclists who currently, or in the future would be otherwise attracted to use the route of the Proposed Scheme. Whilst, in the “Do Nothing” Alternative, ongoing improvements may be provided along the route of the existing corridor extents, this is likely to be piecemeal and disconnected without the wide-strategic benefits to be derived from the Proposed Scheme.

In addition, with the “Do Nothing” Alternative, there would not be significant strategic investment in improvements to the pedestrian environment. Rather, improvements would be limited to relatively limited interventions, for example, ongoing maintenance of existing footpaths and adjacent public spaces. The Do Nothing Alternative would not result in improvements to encourage more journeys generally at a local level by active travel, including connecting to and from bus stops for all pedestrians, and in particular improving facilities for the mobility and visually impaired.

For all of these reasons, and having regard to these environmental considerations in particular, a Do Nothing alternative is not considered to be a viable alternative relative to the outcomes which can be realised by the Blanchardstown to City Centre Core Bus Corridor Scheme.

Demand Management Alternative

One of the primary aims of the GDA Transport Strategy is to significantly reduce demand for travel by private vehicles, particularly during the commuter peaks, and to encourage use of walking, cycling and public transport. One of the mechanisms to achieve such reduction of private vehicle use is the use of measures to discourage travel by car – I.e., demand management.

Demand management can take many different forms from restricting car movement or car access through regulatory signage and access prohibitions, to parking restrictions and fiscal measures (such as tolls, road pricing, congestion charging, fuel/vehicle surcharges and similar). All of these approaches discourage car use through physical means or by adding additional costs to car use such that it becomes more expensive and alternative modes become more attractive. A key success factor of demand management is greater use of alternative travel modes, in particular public transport.

However, in the case of Dublin, the existing public transport system does not currently have sufficient capacity to cater for large volumes of additional users. In the case of the bus system, the increasing levels of traffic congestion over recent years prior to the COVID-19 pandemic added to bus delays and means that additional bus fleet and driver resources have been utilised simply to maintain existing timetables, rather than adding overall additional capacity. The objective of the GDA Transport Strategy is to significantly increase the capacity, and subsequent use, of the public transport system, focussing on the overall BusConnects Programme in the case of the bus system, the DART+ Programme in the case of heavy rail, and the Luas/Metro programme in the case of light rail.

Congestion is a significant contributor to GHG emissions and the related negative environmental impacts associated with poor air quality, noise levels, and related health and quality of life consequences. Demand management measures need to be associated with positive environmental benefits that can be achieved when commuters change modes to high-quality public transport, walking, and cycling that can help reduce GHG emissions and bring associated health benefits. The objective of the GDA Transport Strategy to significantly increase the capacity, and subsequent use of these alternative modes requires that the necessary physical infrastructure is necessary to deliver the efficiencies to make the mode-shift attractive and environmentally beneficial.

In advance of a significant uplift in overall public transport capacity in the Dublin metropolitan area, the implementation of major demand management measures across that area would be unsuccessful. Effectively constraining people from making journeys by car and requiring them to use other modes, without those modes having the necessary capacity to cater for such transfer, would not deliver an effective overall transport system. Instead, the capacity of the public transport system needs to be built up in advance of, or in conjunction with, the introduction of major demand management measures in the Dublin metropolitan area. This is especially true in the case of the bus system where a major increase in bus capacity through measures such as the Proposed Scheme would be required for the successful implementation of large-scale demand management initiatives.

While the foregoing addresses the dependency of demand management measures on public transport capacity, it is equally correct that the provision of greatly enhanced cycling facilities will also be required to cater for the anticipated increase in cycling numbers, both in the absence of demand management measures and, even more so, with the implementation of such measures. Demand management initiatives by themselves will not deliver the level of segregated cycling infrastructure required to support the growth in that mode. Consequently, the progression of demand management proposals will not secure the enhanced safe cycling infrastructure envisaged under the Proposed Scheme.

Accordingly, the implementation of demand management measures would not remove the need for additional infrastructure to serve the bus transport needs of the corridor covered by the Proposed Scheme, nor would it obviate the need to develop the cycling infrastructure required along the route of the Proposed Scheme.

Section 3.3.1 Initial High Level Route Alternatives of Chapter 3 Reasonable Alternatives of Volume 2 of the EIAR states the following:

The Route Options Assessment identified feasible options along the corridor, assessed these options and arrived at the Emerging Preferred Route, which then formed the basis of the first non-statutory public consultation. A summary of the process is described below. The Route Options Assessment used a two-stage assessment process to determine the Emerging Preferred Route Option, comprising:

- *Stage 1 – an initial high-level route options assessment, or ‘sifting’ process, which appraised routes in terms of ability to achieve scheme objectives and whether they could be practically delivered. The assessment included consideration of the potential high level environmental constraints as well as other indicators such as land take; and*
- *Stage 2 - Routes which passed the Stage 1 assessment were taken forward to a more detailed qualitative and quantitative assessment. All route options that progressed to this stage were compared against one another using a detailed Multi-Criteria Analysis in accordance with the Department of Transport Document “Common Appraisal Framework for Transport Projects and Programmes”.*

The study area for the corridor, as shown in Image 3.3 (Figure 4.57.4 below), was divided into three Study Area Sections to simplify the assessment process:

- *Study Area Section (SAS) 1 – Blanchardstown to M50 East*
- *Study Area Section (SAS) 2 – M50 East to Cabra*
- *Study Area Section (SAS) 3 – Cabra to the Liffey Quays (Ellis Quay)*

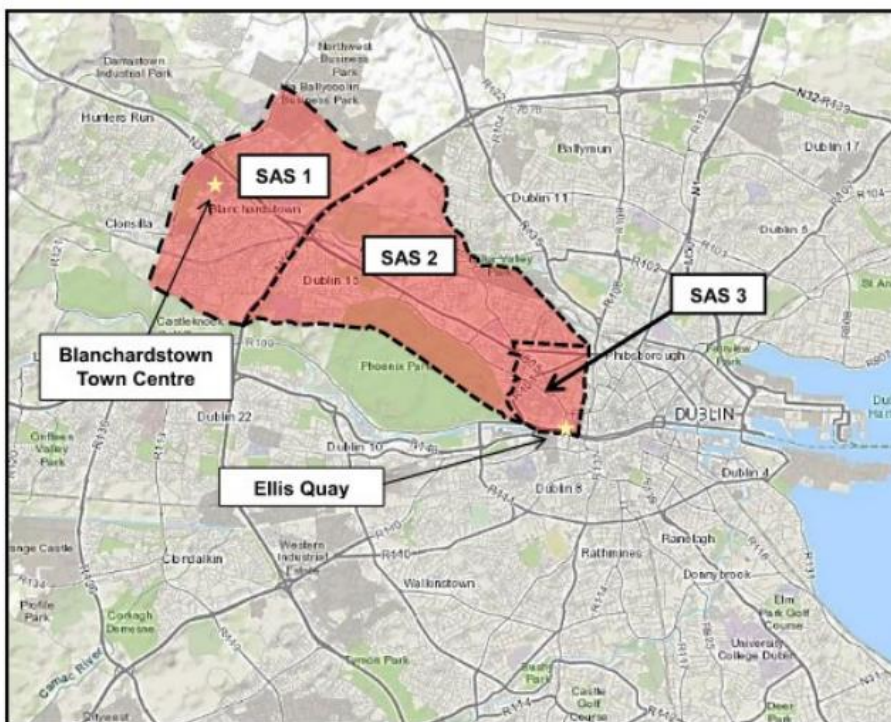


Figure 4.57.4: Study Area Sections (SAS)

At the start of the Stage 1 assessment, an initial ‘spiders web’ of potential route options that could accommodate a Core Bus Corridor was identified for each Study Area Section.

The initial “spider’s web” was narrowed down having considered existing physical conditions/constraints within the study area. This exercise examined and assessed technically-feasible route options, based upon specific objectives. In addition to being assessed on their individual merits, routes were also assessed relative to each other enabling some routes to be ruled-out if more suitable alternatives existed.

The Stage 1 assessment considered engineering constraints, high-level environmental constraints and an analysis of population catchments. Numerous links forming part of the “spider’s web” were not brought forward to the Stage 2 assessment due to space constraints, lack of appropriate adjacent linkages to form a coherent end-to-end route, unsuitability of particular routes, the need for significant land take from residential properties in addition to other factors.

Arising from consideration of the various permutations possible in respect of the “spider’s web”, a reduced number of coherent end-to-end options were identified for further assessment. In arriving at these options, those links which failed the initial sifting stage were removed as well as those links that were disconnected and could not clearly form part of the end-to-end options. Options which passed the Stage 1 assessment for each Study Area Section are presented in the following images (extracted from Route Options Assessment (AECOM/ROD, 2018)):

Refer to Figure 4.57.5 below which shows SAS 2. 13 of the 53 route sections assessed passed stage 1 Assessment, these are shown in green.

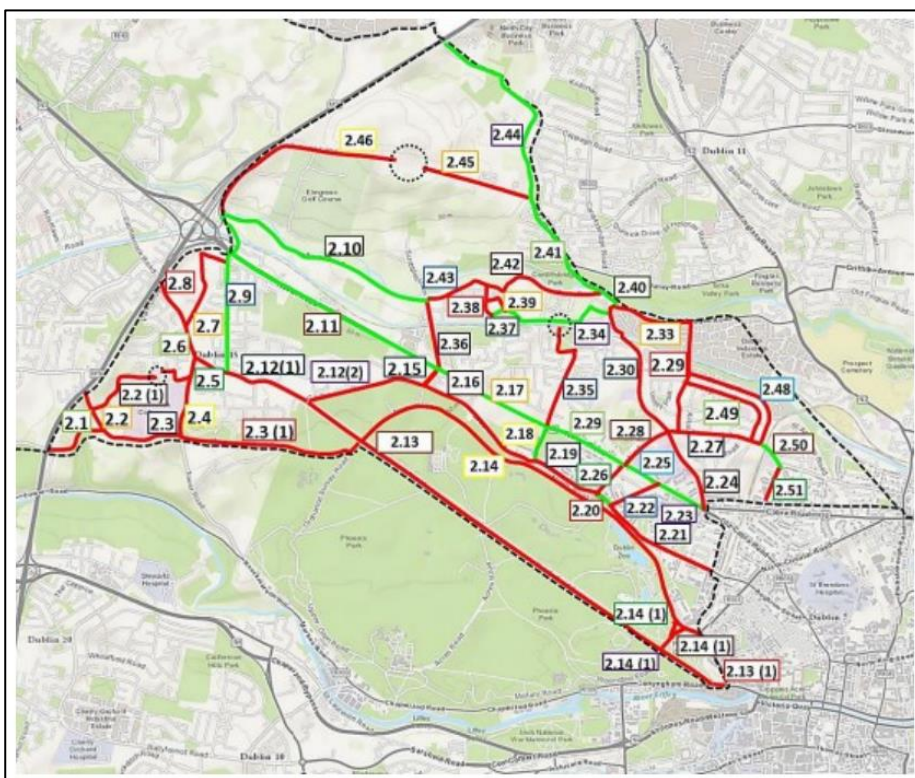


Figure 4.57.5: Study Area Section 2 (SAS 2) (M50 East to Cabra) Route Options Sections (in green) which passed Stage 1 Assessment. Figure 5.5 Route Options Assessment

Appendix K of the Preferred Route Options Report provided within the Supplementary Information, notes the reason why the route sections pass or fail the stage 1 assessment, as per below:

- Section 2.19 - Blackhorse Avenue from Baggot Road Junction (2.18) to Nephin Road Junction (2.28) - There is no link to Blanchardstown or Dublin City Centre. Optimum bus and cycle facilities cannot be provided due to the close proximity of residencies to the existing carriageway at various locations along the route. As a result, this is not a viable route.
- Section 2.26 - Nephin Road from Navan Road Junction (2.29) to Blackhorse Avenue (2.20) - There is small scope to widen the existing carriageway as the road width required to provide the optimum bus and cycle facilities would be dependent on unfeasible 3rd party land take. As a result, this is not a viable route

- Section 2.22 - Skreen Road from Blackhorse Avenue (2.21) to Navan Road (2.23) - This route section is not included in the GDA National Cycle Network Plan. Road widening would be problematic due to the close proximity of residencies to the existing carriageway at various locations along the route. There is no direct link to Blanchardstown or Dublin City Centre. As a result, this is not a viable route.
- Section 2.21 - Blackhorse Avenue from Skreen Road Junction (2.22) to Dunard Road Junction - There is small scope to widen the existing carriageway in certain locations due to unfeasible 3rd party residential land take required. As a result, this is not a viable route

As shown in Figure 4.57.5 the only ‘coherent end-to-end option’ identified for SAS2 is along the Navan Road, terminating at the Navan Road / Old Cabra Road junction, ruling out the parallel route of Blackhorse Avenue as a viable option. As a result, all route options in SAS 3 commence at the Navan Road / Old Cabra Road junction / Cabra Road junction.

Refer to Figure 4.57.6 below which shows an initial ‘spiders web’ of potential route options for SAS 3.

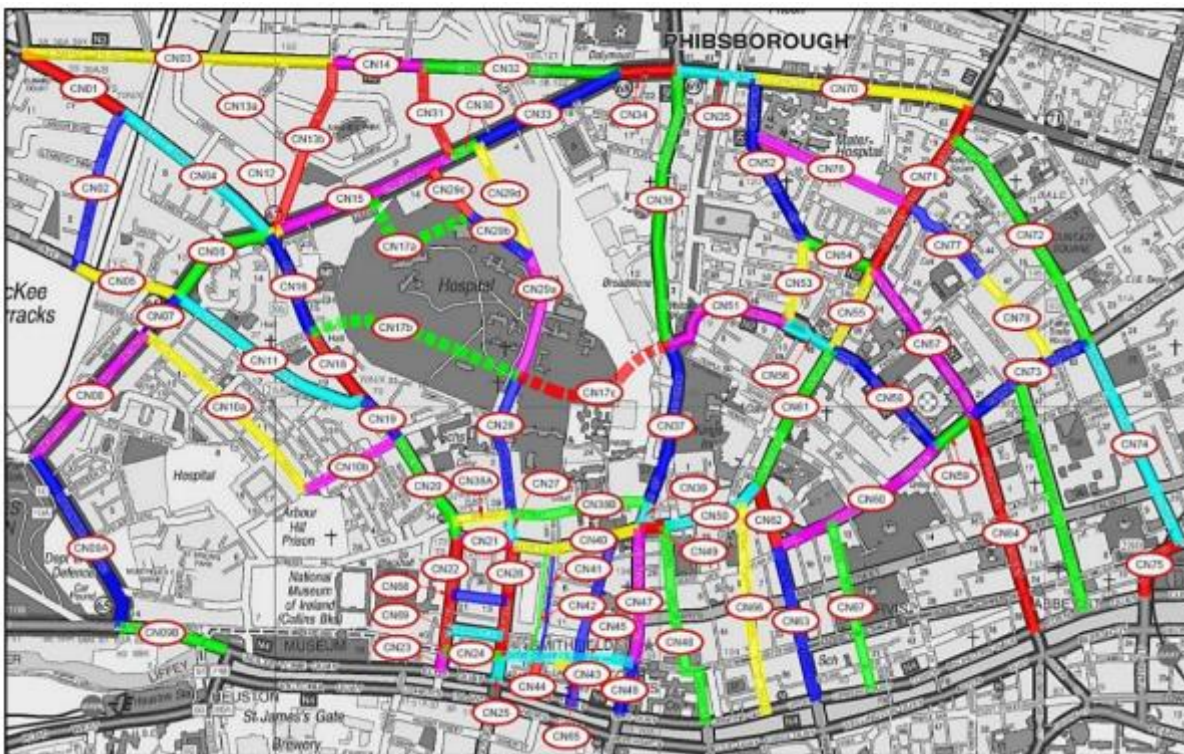


Figure 4.57.6: Image 3.6 Study Area Section 3 (SAS 3) (Cabra to Liffey Quays) Spiders Web of Route Options (85 route sections assessed) extracted from (Blanchardstown Town Centre to the Liffey Quays (Ellis Quay) CBC Route Options Assessment). Figure 5.6 Route Options Assessment (2018).

Section 3.3.2.3 Study Area Section (SAS) 3: Scheme Options Assessment of Chapter 3 states the following:

Following the Stage 1 sifting process for SAS 3, the remaining route options (as shown in Figure 4.57.7 below) were combined to form seven possible continuous route options between the R147 Cabra Road Junction and the bridge crossings on the River Liffey.

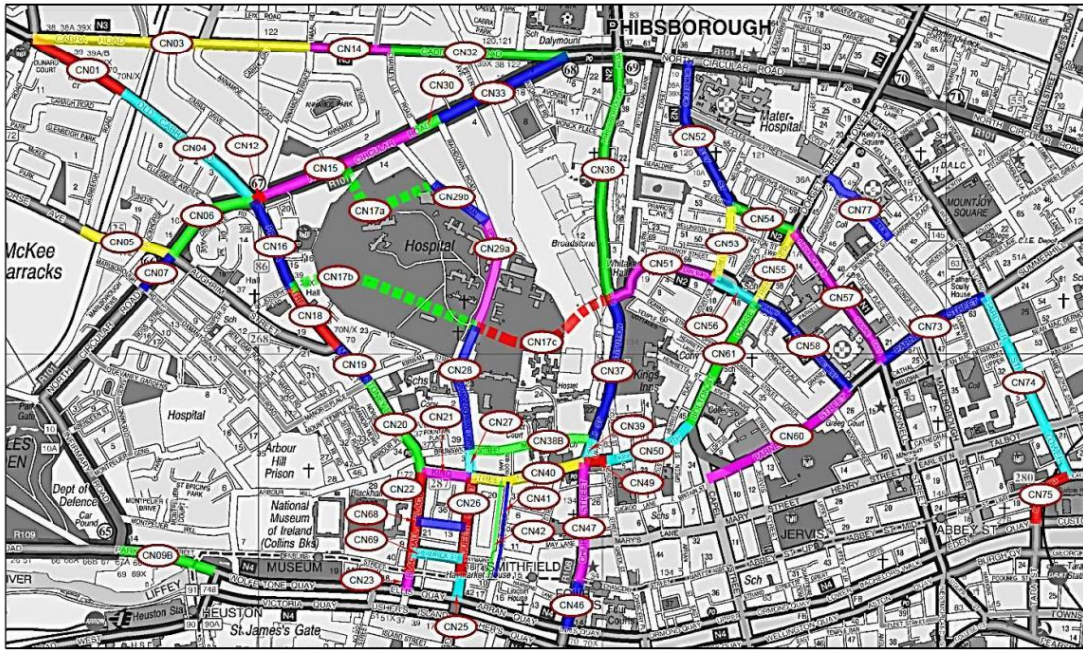


Figure 4.57.7: Route sections passing Stage 1 Sift in SAS 2

These preliminary routes options are shown in Image 3.17 (Figure 4.57.8).

As noted in section 6.2.1 Route Linearity of Appendix K of the Preferred Route Options Report provided within the Supplementary Information:

Directness (i.e. linearity), is considered central to network planning as indicated in the Dublin Area Bus Network Redesign Choices Report (2017) which states: "Where a bus can reach major destinations by running in straight lines (rather than weaving in and out of neighbourhoods), bus service is faster, and less expensive to operate, and less frustrating for customers".

Bus infrastructure should therefore aim to be as direct as reasonably possible, minimising delays and detours. The purpose of this sift is to assess each route option's directness, to avoid circuitous patterns thus improving the reliability and effectiveness of the proposed network. Optimising the route in this manner confers an advantage in terms of attractiveness and comfort to passengers when compared with indirect or circuitous patterns. This is particularly important for the retention of bus users and attracting new users.

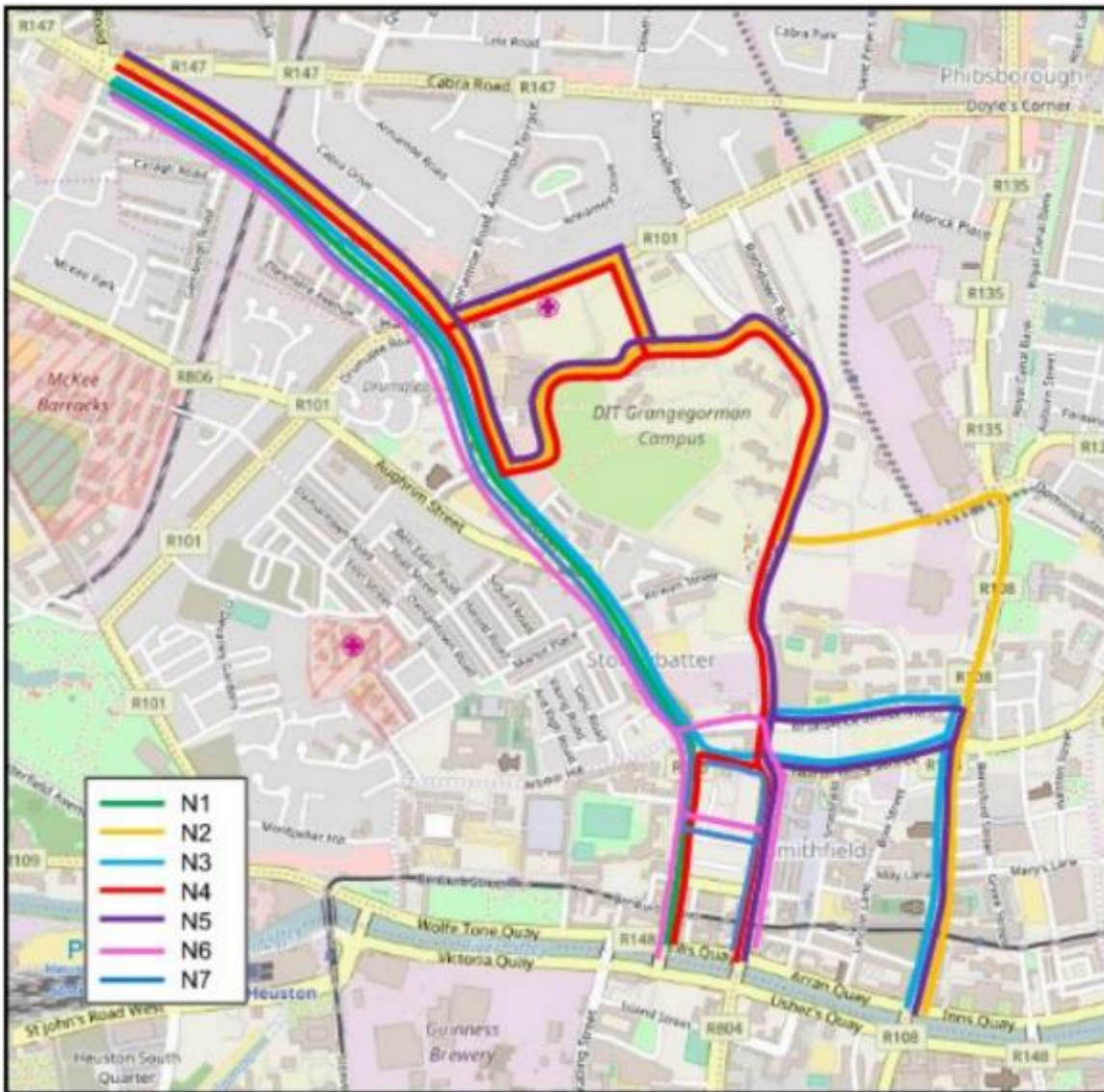


Figure 4.57.8: Image 3.17: SAS 3 – Route Options. Figure 6.27 Route Options Assessment (2018).

The seven route options for SAS 3 included were labelled N1 to N7, with descriptions of each route as described in section 3.3.2.3 of Chapter 3 of Volume 2 of the EIAR.

Extracts from section 6.4.8 of Appendix K of the Preferred Route Options Report provided within the Supplementary Information states the following:

A scheme option was designed along each of the seven route options to prioritise bus and cycle infrastructure where possible.

The 7 scheme options were brought forward to MCA to identify the most appropriate design for SAS 3.

In terms of ‘Economy’, route option N1 has the lowest capital cost compared to the other options and lower associated operation and maintenance costs. Similarly, the transport reliability and quality is considered higher, by virtue of this route passing through the least amount of signalised junctions where delays due to acceleration and deceleration are present.

In terms of ‘Integration’ routes N2 and N5 would have some disadvantages in comparison to the other routes, particularly in terms of cycle integration, and land-use.

Under ‘Accessibility & Social Inclusion’ route N3 directly serves within the Dublin North West Inner City RAPID area while the others serve select areas only. Routes N1, N6 and N7 serve the highest number of trip attractors.

Under 'Safety' route N4 is considered to be ranked highest as it makes most use of lightly trafficked roads. Route N5 follows along Church Street which is currently heavily congested.

In terms of Physical Activity all routes were considered to have a neutrally positive effect.

Under 'Environment' the overriding criterion is Archaeology and Cultural Heritage, where the routes through Stoneybatter traverse through a higher percentage of zones of archaeological potential. The impact of the routes as a result of Landscape and Visual intrusion is considered to be less through Grangegorman due to the current Masterplan development of the Campus and the changes to the surrounding landscape that are currently being implemented. However the Land Use Character criterion considers the routes through Stoneybatter as more favourable to the Environment as no change of use to the land is required.

Overall, Route Option N1 was identified as the preferred option for this section and was brought forward into the Emerging Preferred Route.

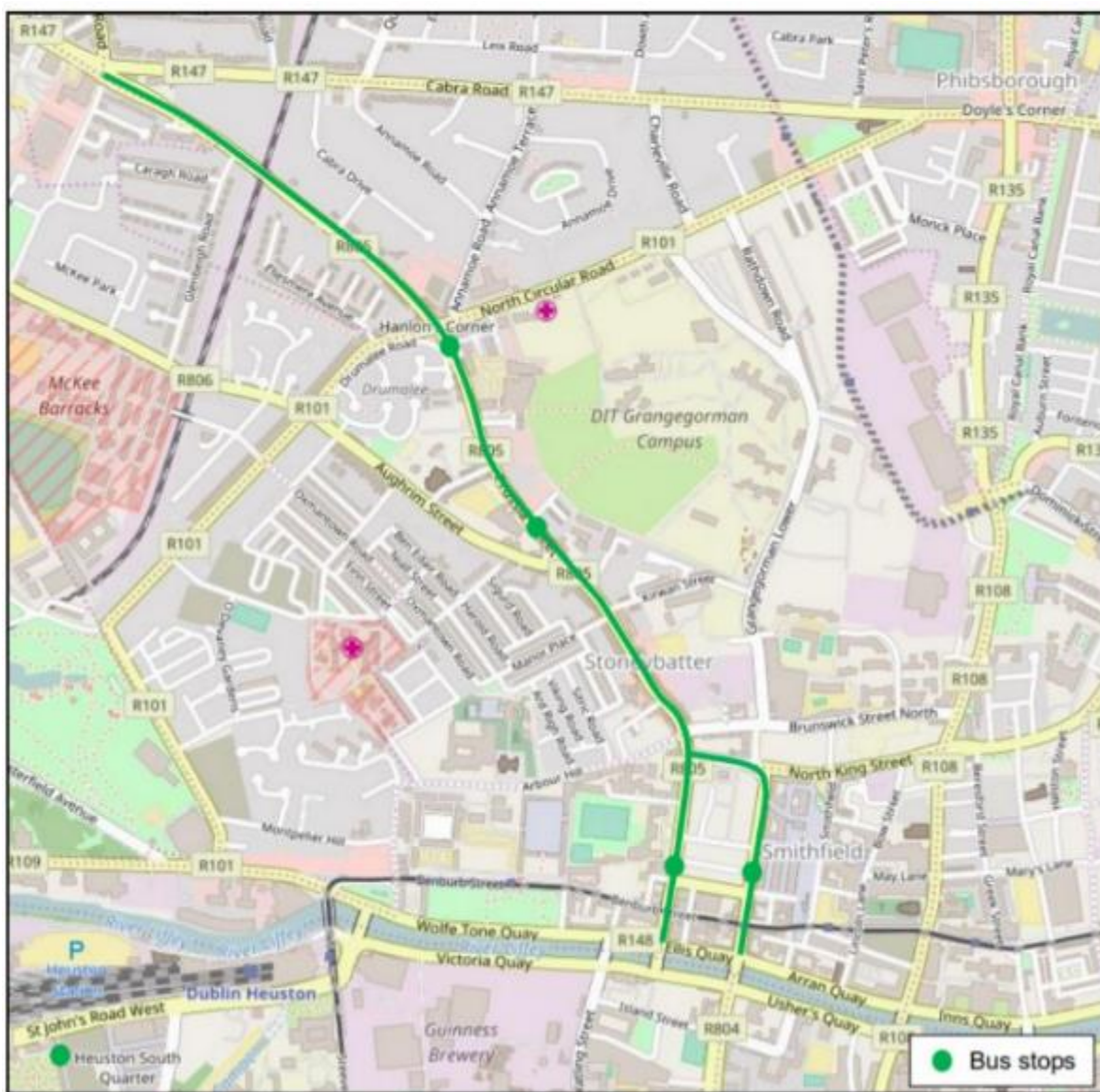


Figure 4.57.9: Figure 6.28 Route Option N1

As noted in section 6.4.9 Stage 3 Scheme Options assessment of Appendix K Blanchardstown to the Liffey Quays Ellis Quay CBC Route Options of the Preferred Route Options Report of the Supplementary Information:

The more complex city centre environment requires a more refined examination of the cross sectional requirements along the preferred route. It is not possible to achieve 100% bus priority in both directions on all links, due to the increased competition for space in the denser central environment.

It is therefore essential to ensure that an optimal balance is achieved between the discouragement of through traffic where required to achieve bus priority, and the maintenance of local access. Several scheme design variants have been identified along Route N1, which are assessed using the same methodology as Stage 2 above, to determine the best cross sectional configuration along each link.

Old Cabra Road

The Old Cabra Road between the Navan Road and North Circular Road is constrained by frontage residential development on both sides. There is a pocket of commercial development at the southeastern end of the road, including a supermarket and a public house. The route currently carries commuter traffic and radial bus routes. It is desirable that the bus priority along the route should be enhanced as part of the Bus Connects project. Three variant scheme options have been explored for the enhancement of public transport priority along the Old Cabra Road. These are:

- 1. Construct within existing road boundaries;*
- 2. CPO for full bus priority in both directions;*
- 3. Limited CPO for bus priority on approaches to junctions.*

Scheme Variant 1 would involve the implementation of traffic restrictions along the route, blocking general traffic access from both the north and south, and providing access onto the Old Cabra Road from Glenbeigh Road only. Only public transport would be allowed to access the road from the Navan Road or Prussia Street. A two-way cycle track would be provided along the eastern side of the road. This scheme is as included in the earlier Blanchardstown to UCD BRT scheme.

Scheme Variant 2 would maintain traffic access onto the Old Cabra Road and would involve the acquisition of gardens along the route to provide bus lanes. The levels of the road would have to be raised in order to compensate for the shortening of the steep driveways. It is unlikely that the acquisition and demolition of the commercial premises at the southern end of the route would prove viable, and it is therefore assumed that the bus priority would terminate north of the supermarket premises, with a bus gate provided to achieve bus priority southbound. A two-way cycle track would be provided along the eastern side of the road.

Scheme Variant 3 is a hybrid of the above. It involves limited land acquisition to achieve bus priority on the approaches to the junctions at either end of the scheme. In addition, there would be a restriction on general traffic access from the Navan Road, so local traffic access from the north would be via Blackhorse Avenue and Glenbeigh Road. Local access would be permitted from the southern end as far as Cabra Drive only.

The scheme variants score equally under most headings, except for the following:

- The variants requiring land acquisition have a higher capital cost;*
- The variants where land acquisition is proposed will provide better transport reliability;*
- The variants where land acquisition is proposed will have less impact on local access, and hence land use;*
- The variants providing additional lanes through CPO will provide better traffic network integration, since there will be a lower impact on current general traffic circulation patterns;*
- The options involving CPO will have a greater landscape and visual impact;*
- The options involving CPO will have a greater impact on land use character.*

Overall, Scheme Variant 3, with a selective and limited CPO to achieve bus priority with reduced impacts on frontage properties has fewest negative impacts and has emerged as the best solution for this subsection.

Prussia Street and Manor Street

Prussia Street is quite narrow and has frontage development a mixture of commercial and residential along both sides. There is a shopping centre with car park near the northern end. Manor Street is wide, with four lanes of traffic / parking currently along most of the street. The street narrows at its southern end.

Measures proposed at the Navan Road / Old Cabra Road will restrict general traffic access to Prussia Street from the north. This will effect bus priority in the southbound direction without requiring land acquisition, and will maintain local access. Northbound, it is proposed to prevent general traffic accessing Prussia Street directly from Manor Street. However, access will be provided via Aughrim Street and St. Joseph's Road for those requiring local access. This will discourage general traffic from using the traditional Manor Street - Prussia Street - Old Cabra Road - Navan Road traffic route, thereby improving priority for public transport along the route. It is further proposed to ban the straight ahead traffic movement from Prussia Street to the Old Cabra Road except for buses and cyclists. This will complement the proposed measures at Manor Street. Local access will remain available via alternative routes in each instance.

While Prussia Street and Manor Street are identified on the Greater Dublin Area Cycle Network Plan as a primary route, the competition for road space is such that Quality of Service A appears to be unachievable. It is therefore recommended that the primary route be instead routed via the DIT Grangegorman Campus to Grangegorman Road Lower to continue onto Queen Street.

Parking and loading facilities will be rationalised through Prussia Street, Manor Street and Aughrim Street in order to facilitate the above public transport priority enhancements. No variant scheme options were identified along this subsection of the route.

Stoneybatter to Ellis Quay

Route N1 continues to the River Liffey at Ellis Quay via Stoneybatter, Blackhall Place and Queen Street. There are a number of potential routing variants encompassing the grid of available north-south and east-west streets. The following are considered to be possible options:

- 1. Two-way on Blackhall Place;*
- 2. Two-way on Queen Street;*
- 3. One-way northbound on Blackhall Place and one-way southbound on Queen Street;*
- 4. Hybrid of 1) and 3).*

Scheme Variant 1 would involve the retention of the existing arrangement at the southern end of Stoneybatter. However, there is insufficient road space available to accommodate a northbound bus lane, a northbound traffic lane, a right turning traffic lane [which is required for access to North Brunswick Street / Constitution Hill area and Smithfield car park], and a southbound bus lane. Therefore, as existing, the northbound bus movement would have to share with traffic on approach to the junction. This variant would achieve only limited bus priority in either direction through Stoneybatter, due to the turning circle required for larger vehicles at the North Brunswick Street and North King Street junctions.

Scheme Variant 2 would involve introducing two-way bus movements on Queen Street and displacement of southbound traffic to Blackhall Place. Buses would access Queen Street from Stoneybatter via North Brunswick Street and North King Street. However, Queen Street must also accommodate a two way cycle route to provide cycling access to the DIT Grangegorman Campus. The available cross section can only accommodate three traffic lanes total, and so general traffic access could not be retained.

Scheme Variant 3 would involve a local one-way system for public transport to allow improved bus priority through Stoneybatter. Southbound buses would access Queen Street via either North Brunswick Street or North King Street. This would obviate the need for a southbound bus lane on Blackhall Place, and would therefore allow the separate provision of a northbound bus lane, a northbound traffic lane and a right turn from Blackhall Place to North King Street. The two-way cycle route would be accommodated on Queen Street, This would require the reduction in general traffic provision on Queen Street from three southbound lanes to one.

Scheme Variant 4 is as per Variant 3 but southbound buses would return to Blackhall Place via Blackhall Street, therefore allowing the retention of a second southbound traffic lane on Queen Street on approach to the river.

The scheme variants score equally under most headings, except for the following:

- The variants requiring extensive alterations to existing traffic circulation have a higher capital cost;*

- *Variants 1 (existing with limited bus priority) and Variant 2 (requiring a complex one-way arrangement for buses along North Brunswick Street and North King Street) score poorer in terms of journey time reliability;*
- *The variants where local access and circulation is maintained similar to the status quo score better in terms of integration;*
- *Option 2 scores poorly in terms of traffic network integration since it would block access to Bridgefoot Street from Queen Street.*

Overall, Scheme Variant 4, with a limited rerouting of traffic to maximise bus priority with reduced impacts on frontage properties has fewest negative impacts and has emerged as the best solution for this subsection.

A Preferred Route Option (PRO) Report was then prepared for the Proposed Scheme which built on the Blanchardstown Town Centre to the Liffey Quays (Ellis Quay) CBC Route Options Assessment.

Extract from section 1.3 of the Preferred Route Options report in the Supplementary Information states the following:

The Study Area Analysis and Multi Criteria Analysis (MCA) for the previously proposed feasible route options are considered to still be valid unless otherwise detailed and updated in this PRO Report. Any additional design work or optioneering has been assessed against the previously identified EPR Option and draft PRO in order to determine the PRO. Additional design development has been detailed in this report, and the resulting PRO referenced in this report has been based on:

- *Updated topographical survey information;*
- *Output from engagement and consultation activities on the EPR Option and draft PRO proposals;*
- *Clarifications to the previous assessment in the 'Blanchardstown Town Centre to the Liffey Quays (Ellis Quay) CBC Route Options Assessment';*
- *Further design development and options assessment; and*
- *Change in the extent of the Proposed scheme.*

Extracts from Section 6.3 Section 3 Option Assessment: Navan Road / Ratoath Road to Ellis Quay of the Preferred Route Option Report in the Supplementary Information state the following:

Section 3a - Navan Road/Ratoath Road to Prussia Street (Park Shopping Centre)

Introduction

Numerous submissions received as part of the public consultation process raised concerns that the proposed traffic management plans; in particular, restricting general traffic movement along the Old Cabra Road may cause increased levels of traffic on residential roads as well as creating congestion elsewhere on the road network.

Options Considered

Two alternative options have been assessed as follows:

- *Option NV1: Option NV1 would introduce a bus gate at the northern end of Old Cabra Road (at its junction with Navan Road), and a section of northbound bus lane on Old Cabra Road south of Glenbeigh Road which would effectively remove the ability of through-traffic to travel between Stoneybatter and Navan Road in both directions along the Old Cabra Road. Cycle-lanes in each direction are proposed on Old Cabra Road from Navan Road to Prussia Street. Option NV2: EPR*
- *Option NV2 is similar to Option NV1 and would involve closing off Old Cabra Road as a general traffic through-route - but with a two-way cycle-track provided on the eastern side of Old Cabra Road from Navan Road to Prussia Street.*

Based on the assessment undertaken, route Option NV1 offers more benefits over Option NV2 although both options perform well in respect of bus priority. Option NV1 is the preferred option for the following reasons:

- On economy, NV2 has a higher capital cost due to the requirement to widen the rail bridge to accommodate the two-way cycle track, compared to NV1 where bridge widening is not required.
- In respect of integration, the NV1 option has two one-way cycle tracks, on each side of the road, segregated from the general traffic carriageway, which offers cyclists a more intuitive route on Old Cabra Road (compared to a two-way cycle track without a traffic/cycle buffer for NV2).
- On environment, Option NV1 has less land take and less impact on trees than NV2 due to a reconfiguration of the proposed carriageway cross-section.

Section 3b - Prussia Street (Park Shopping Centre) to Stoneybatter/Brunswick Street North Junction

Introduction

Numerous submissions received as part of the public consultation process raised concerns that the proposed traffic management plans, in particular, restricting general traffic movement through Stoneybatter, may cause increased levels of general traffic on residential roads as well as creating congestion elsewhere on the road network. Submissions also raised concerns about the impact on green space at the junction of Manor Street, Prussia Street and Aughrim Street, and constrained width of footpaths in Stoneybatter.

Options Considered

Three options have been assessed as follows:

- **Option SB1:** Option SB1 proposals consist of a southbound and northbound bus gate on Prussia Street at its junction with Aughrim Street. South of Aughrim Street, two general traffic lanes and two cycle tracks would be provided on Manor Street until the junction at Manor Place. Along Manor Street / Stoneybatter between Manor Place and Brunswick Street North, cycle tracks in both directions would be provided, with an outbound bus lane, and inbound and outbound general traffic lanes.
- **Option SB2:** Option SB2 proposals consist of an inbound general traffic lane, with an inbound bus lane on Prussia Street beginning at , and an outbound bus lane beginning just south of Manor Place. Aughrim Street would have a general traffic lane in both directions at its junction with Manor Street. Along Manor Street / Stoneybatter south of Manor Place, there would be general traffic lanes in both directions, a bus lane southbound, and a northbound cycle track.
- **Option SB3:** Option SB3 proposals consist of a southbound and northbound bus gate on Prussia Street at its junction with Aughrim Street. South of Aughrim Street, inbound and outbound general traffic lanes and two cycle tracks would be provided on Manor Street / Stoneybatter until the junction at Brunswick Street North.

A northbound bus priority signal is proposed on Blackhall Place where northbound general traffic would need to turn right into King Street North, and then travel via George's Lane and Brunswick Street North, to reach Manor Street.

Alternative Options Considered

Three options have been assessed as follows:

Alternatives were considered, but not progressed, as follows:

- **Closing Stoneybatter to through traffic:** Full closure of through-traffic access via Stoneybatter was considered unfeasible due to the impracticality of preventing through vehicular traffic while also allowing the necessary vehicular access for local residents and businesses. For example, it would be necessary to allow local traffic to enter from the north or south, and the return journey would require long diversions of around 3km (e.g. via North Circular Road) which would both tend to create local congestion and would also tend to encourage drivers to perform three-point turns on the bus corridor to avoid having to follow a one-way diversion route on their return journey.

- **Routing cyclists through Grangegorman:** Routing cyclists through Grangegorman instead of along Prussia Street and Manor Street was also considered, which would require a cycle link from the northern end of Prussia Street through to Grangegorman Lower. For purposes of the CBC, this alternative cycle route would not be an essential component, and routing cyclists along Prussia Street and Manor Street (Route 4D in the GDA Cycle Network Plan) would provide an appropriately high quality and direct route.
- **Routing of the CBC corridor via Phoenix Park:** Use of Phoenix Park has been identified by stakeholders as a potential alternative route for buses between Blanchardstown and the city centre. However, the general principle for successfully attracting people to use buses is to ensure that the bus service path is as close as potential to where people live, work and visit.

In this respect, it is essential that the CBC is routed via Stoneybatter in order to ensure that people who live and work there, or need to visit, are able to do so using a high frequency bus service (which is connected to the wider bus network to maximise travel catchment). Hence the potential for routing the CBC corridor via Phoenix Park has not been taken forward for detailed consideration.

Based on the assessment undertaken, route Option SB3 offers more benefits. It performs well under all criteria. Option SB3 is the preferred option for the Prussia Street/Manor Street to Brunswick Street North section for the following reasons:

- *For economy, it provides reliable bus priority through Stoneybatter Village while also limiting through traffic efficiently (on Blackhall Place), while also allowing local access for residents and businesses; and acknowledging the urban village function of Stoneybatter Village;*
- *For integration, it provides high-quality segregated cycle tracks on both sides of the road, serving the urban village of Stoneybatter which is a significant trip attractor and cycling destination;*
- *For safety, it has two general traffic lanes and hence more clarity in terms of lane usage and associated management of through traffic, and has wider footpaths for pedestrians; and*
- *For environment, it allows for the wider footpaths and associated public realm improvements within Stoneybatter Village.*

Section 3c - Stoneybatter/Brunswick Street North Junction to Ellis Quay

Introduction

Numerous submissions received as part of the public consultation process raised concerns about the proposed traffic management plans; constrained width of footpaths and space provided for cyclists and pedestrians in this area.

Options Considered

Three alternative options have been assessed as follows:

- **Option BK1:** *Option BK1 consists of a full bus lane in both directions on Blackhall Place to Ellis Quay, with inbound general traffic diverted from the bus corridor to King Street North. Northbound general traffic would be accommodated on Blackhall Place alongside a bus lane. A quiet street treatment is proposed for Brunswick Street North, and a two-way cycle track is proposed via Brunswick Street North Queen Street.*
- **Option BK2:** *EPR Option BK2 consists of a Bus Priority signal for inbound movements from Stoneybatter at Brunswick Street North, with general traffic diverted onto Brunswick Street North and King Street North. Full bus lanes would be provided in both directions on Blackhall Place to Ellis Quay. George's Lane would become a two-way street for general traffic. A two-way cycle track is proposed to Ellis Quay.*

- **Option BK3:** Option BK3 consists of a bus lane in both directions on Blackhall Place to Ellis Quay, with inbound and outbound general traffic all turning into King Street North. Northbound general traffic bound for Stoneybatter / Manor Street would be accommodated via George's Lane and Brunswick Street North (which would be northbound and westbound one-way streets respectively). Two one-way cycle tracks are proposed on Brunswick Street North leading to a two-way cycle track along Queen Street.

Alternative Options Considered

An alternative was considered that involved closing Blackhall Place to southbound general traffic at its junction with Stoneybatter, to remove through traffic. This was not progressed due to the impracticalities of preventing through vehicular traffic while also allowing the necessary vehicular access for local residents and businesses in Stoneybatter.

Consideration was also given to removal of a southbound general traffic lane along Blackhall Place, from its junction with Blackhall Street to the Quays. However, following a review of the traffic modelling analysis, this was discounted.

Based on the assessment undertaken, route Option BK3 offers more benefits over the other options. Option BK3 is the preferred option for the following reasons:

- For economy, it provides reliable bus priority by traffic signal control (and limitation) of through traffic at Blackhall Place.
- For integration, it provides a continuous high-quality cycle facility from Manor Street through to Queen Street.
- For safety, it provides safe facilities for pedestrians and cyclists alike due to the rationalised junction arrangements at Blackhall Place/King Street North and George's Lane.
- For Environment, it provides for wider footpaths on Manor Street/Stoneybatter and maintains public space on George's Lane.

Consequently, bus gates are proposed as part of the Proposed Scheme to ensure the scheme objectives as noted in section 2.1 of Chapter 2 of the EIAR are achieved; these objectives include the following:

- 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; and
- Enhance the potential for cycling by providing safe infrastructure for cycling, segregated from general traffic wherever practicable.

As noted in Section 6.4.6 Operational Phase of Chapter 6 of Volume 2 of the EIAR,

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. Improvement in bus priority measures will reduce the interaction between buses and general traffic and reduce the likelihood of delays.

The qualitative impact assessment has been undertaken based on the following factors:

- Provision of bus lanes;
- Pedestrian accessibility; and
- Changes to the existing bus stop facilities:

For Section 5 – Navan Road / Old Cabra Road junction to Ellis Quay, significant changes will be made to provide bus priority measures, primarily using Bus Gates along this section, to limit access for general traffic:

The effect of all these changes will be to reduce the levels of general traffic along the route of the Proposed Scheme and improve bus journey times along the corridor.

The Proposed Scheme improves the quality of existing bus infrastructure along Section 5 which will provide long term benefits for bus users and aligns with the overarching aim to provide enhanced bus infrastructure on the corridor. This results in a Positive, Very Significant and Long-term effect on this section.

The bus gates proposed as part of the Proposed Scheme balance the provision of bus priority and cycle infrastructure through sections where the available space is limited while minimising impacts on the surrounding environment and limiting through traffic in tandem with facilitating local access for residents and businesses.

Section 6.4.6.2.4 People Movement – Significance of Impact of Chapter 6 of Volume 2 of the EIAR states that *the Proposed Scheme has been adjudged to deliver a **Positive, Very Significant and Long-term** effect in People Movement by sustainable modes. The Proposed Scheme can be shown to deliver significant improvements in people movement by sustainable modes along the corridor, particularly by bus, with reductions in car mode share due in part to the bus gate proposals and the enhanced sustainable mode provision.*

The findings of the People Movement assessment demonstrate that the Proposed Scheme aligns fully with the aims and objectives of the CBC Infrastructure Works, 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'.

The Proposed Scheme along the Old Cabra Road / Prussia Street / Manor Street section includes operation of bus gates on a 24-hour all-day basis. Existing traffic flow levels on the corridor do not show a significant reduction in the middle of the day (relative to peak hours), and hence bus gate operation throughout the day is necessary to provide reliable bus journey times for all services. Although traffic levels reduce significantly in the overnight period, 24-hour bus gates are preferred in order to provide road users with a road layout and network which is consistent at all times and hence can be easily understood and safely used by car drivers, pedestrians and cyclists.

It is also relevant to note that although a bus gate will prevent general traffic movement through this section of the Proposed Scheme, this does not preclude access by car and other traffic.

Access to the north-western section of Old Cabra Road by car and other vehicles, where the Go Station is located, will be available via Glenbeigh Road.

As noted in section 6.4.6.3 Operational Phase Summary of Chapter 6 Traffic and Transport of Volume 2 of the EIAR:

The Proposed Scheme will address sustainable mode transport infrastructure deficits while contributing to an overall integrated sustainable transport system as proposed in the GDA Strategy. It will increase the effectiveness and attractiveness of bus services operating along the corridor and will result in more people availing of public transport due to the faster, more reliable journey times which the Proposed Scheme provides. This in turn will support the future increase to the capacity of the bus network and services operating along the corridor and thereby further increasing the attractiveness of public transport. In addition to this, the significant segregation and safety improvements to walking and cycling infrastructure that is a key feature of the Proposed Scheme will further maximise the movement of people travelling sustainably along the corridor. The combined effect of these changes will therefore cater for higher levels of future sustainable population and employment growth.

In the absence of the Proposed Scheme, bus services will be operating in a more congested environment, leading to higher journey times and lower reliability for bus journeys. This limits their attractiveness to users, and this will lead to reduced levels of public transport use, making the bus system less resilient to higher levels of growth. The absence of walking and cycling measures that the Proposed Scheme provides will also significantly limit the potential to grow those modes into the future.

On the whole, the Proposed Scheme will make a significant contribution to the overall aims of BusConnects that is a key part of the GDA Strategy and will enable the city to grow sustainably into the future. This would not be possible in the absence of the Proposed Scheme.

It is suggested by the owner and operator of the Go Station that the nature and extent of the interference on the Go Station “represents an unjust attack on [their] private property rights” within the meaning of Article 40.3.2 of the Constitution.

The first point to note in that regard is the Proposed Scheme does not involve any acquisition of any of the lands comprising the Go Station or any direct interference with any property rights of the owner/operator of the Go Station. Instead, the complaint of the owner/operator is of an indirect interference by reason of the reduced vehicular traffic on the Old Cabra Road.

Secondly, Article 43.2 of the Constitution recognises that the exercise of property rights ought to be regulated by the principles of social justice and that the State may delimit the exercise of property rights with a view to reconciling their exercise with the exigencies of the common good. On this basis, the system of zoning and planning and development control was found to be constitutional in *Central Dublin Development Association v Attorney General* (1975) 109 ILTR 69. Kenny J. in the High Court had to consider whether certain provisions of the Local Government (Planning and Development) Act 1963 were repugnant to the Constitution.

Kenny J accepted that, for example, the power of a planning authority to make a development plan which “will necessarily decrease the value of some property” was not repugnant to the Constitution noting that he did not “think that the Constitution requires that compensation should be paid for this as it is not an unjust attack on property rights”.

Subtending the contention that the Proposed Scheme represents an unlawful and unconstitutional interference with the property rights of the owner/operator is the proposition that any restriction of, or interference with property rights, must be compensated. However, compensation is not payable in circumstances where the Go Station lands are not being compulsorily acquired and no compensable rights are being acquired or interfered with. Furthermore, the proposition that compensation is payable whenever there is a restriction or limitation of property rights is contrary to the established authorities. For example, in *O’Callaghan v Commissioners of Public Works* [1985] ILRM 364, it was held that the absence of provision of compensation in respect of a limitation on the use of land imposed by the National Monuments Act 1930 did not amount to an unjust attack on the plaintiff’s property rights. The decision of the Supreme Court in *Re Article 26 and Part V of the Planning and Development Bill 1999* [2000] 2 IR 321 and of the High Court in *M&F Quirke & Sons v An Bord Pleanála* [2010] 2 ILRM 91 also makes clear that compensation is not required to be provided for every interference with property rights including a diminution in the value of a business resulting from a planning decision.

In support of their contentions, the owner/operator cite the decisions in *Rooney v Department of Agriculture and Technical Instruction for Ireland* [1920] IR 176 and *Comyn v Attorney General* [1950] IR 142 as support for the proposition that a statute authorising an interference with property rights that does not make provision for the payment of compensation does not relieve the State from the obligation to pay compensation. However, these decisions are not support for this proposition. Both *Rooney* and *Comyn* were concerned with compulsory acquisition, and are merely support for the proposition that, where a statute authorises compulsory acquisition, the Court will recognise a right of compensation (unless the statute expressly or by necessary implication has excluded it).

Section 44 and 46 of the Planning and Development Act 2000 (as amended) are also referenced in the submissions by the owner/operator. Section 44 relates to the revocation or modification of a planning permission and section 46 relates, in part, to a decision of a planning authority that any use should be discontinued or conditions should be imposed on the continuance of a use. These sections of the Planning and Development Act 2000 (as amended) have no application to the situation here which does not involve a revocation or modification of any planning permission relative to the Go Station nor to any decision by a planning authority that any use should be discontinued or continued subject to conditions. As is plain from the description of these statutory provisions themselves, they are of no relevance to the circumstances arising here.

The submission also refers to the European Convention of Human Rights and European Convention on Human Rights Act 2003, and contend, without any explanation or reasoning, that what is proposed would represent a breach of Article 1 of the First Protocol (peaceful enjoyment of possessions) and a breach of Article 14 of the Convention (prohibition on discrimination) as well as a breach of the related/ corresponding rights under the 2003 Act. There are no such breaches.

Article 1 of the First Protocol (peaceful enjoyment of possessions) itself qualifies the right to the peaceful enjoyment of possessions by reference to the concept of public or general interest, a concept given a broad interpretation by the European Court of Human Rights. To reiterate, as mentioned above, the bus gates are a critically important part of the overall Proposed Scheme and to achieving its objectives.

The reliance sought to be placed on Article 14 of the Convention is not understood, given that such Article prohibits discrimination “on any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status”, which clearly does not arise in the circumstances here.

Conclusion

- Corridor options for the Blanchardstown to City Centre Core Bus Corridor Scheme were evaluated using a sifting process and multi-criteria assessment (MCA), with the route along Old Cabra Road, Prussia Street and through Stoneybatter identified as the preferred option to deliver the aim and objectives 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. Alternative core bus service and cycling routes that could mitigate impact on the Go Station to the south of Old Cabra Road along St David’s Terrace and Blackhorse Ave, or through Phoenix Park, or to the east and north around Grangegorman and along Cabra Road could not meet the objectives 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 movements over general traffic movements, and to enhance the potential for cycling by providing safe infrastructure for cycling, segregated from general traffic wherever practicable.
- The options assessment completed for the Proposed Scheme demonstrates the criticality of the inclusion of necessary Bus Gates on Old Cabra Road, at Prussia Street /Manor Street/Aughrim Street junction and at Blackhall Place and these three bus gates are fundamental to the entire CBC Scheme to achieve its objectives.
- Adopting a Do-Nothing approach (i.e. no bus gates), to sustainable travel infrastructure improvements, would lead to further traffic congestion and exacerbation of the problems arising from delayed buses and unreliable journey times. The capacity and potential of the public transport system to respond to demand would remain restricted by the existing deficient roadway infrastructure and the resulting sub-standard levels of bus priority and journey-time reliability. As such, in addition to the continuation of issues relating to existing bus services, future bus services, would not have the potential to address growing demand. This would severely impact the attractiveness of public transport as an alternative to private car usage for those who need to travel along the route of the Proposed Scheme.
- The Environmental Impact Assessment Report for the Proposed Scheme has considered and assessed the effects of the Proposed Scheme on the Go Station and has assessed the impact on the Go Station as “Negative, Very Significant and Long-Term during construction and operation of the Proposed Scheme”. The Transport Strategy for the Greater Dublin Area 2016-2035 (“GDA Transport Strategy”) was prepared by the NTA pursuant to Section 12 of the Dublin Transport Authority Act 2008 and approved by the Minister for Transport, Tourism and Sport in February 2016 in accordance with sub-section 12(13) of that Act. In considering the alternative modes (including bus-based transport modes) on a corridor basis, the Strategic Environmental Assessment (SEA) evaluation of the GDA Strategy considered that bus-based projects could contribute towards facilitating the achievement of Ireland’s greenhouse gas emission targets in terms of emissions per passenger per kilometre. BusConnects is included as a specific policy objective of Project Ireland 2040 – The National Development Plan 2018 – 2027, published on 16 February 2018. The Emerging Preferred Route Option for the public consultation for the Blanchardstown to City Centre Core Bus Corridor Scheme was published on 14 November 2018. Ireland declared a climate emergency on 9 May 2019. The first Climate Action Plan was published on 17 June 2019. The Go Station was built in full knowledge of the emerging CBC scheme proposals following a grant of planning permission for the development by An Bord Pleanála in January 2019.
- Insofar as the submission suggests that the owner/operator of the Go Station should have been included in the CPO, such that a right of compensation would have arisen, such a proposition is misplaced. None of the Go Station lands are necessary or required for the Proposed Scheme.

The NTA has fully complied with all legislative and statutory requirements (including with its obligations under the EIA Directive and national transposing legislation), and given the importance of the bus gates at this location as part of the Proposed Scheme (as evidenced above), were An Bord Pleanála to approve the Proposed Scheme, there could be no question of any unconstitutional interference with the property rights of either LCC Properties & Investments (Ireland) Limited or Lissan Coal Company Ireland Limited.

The NTA notes the request for an Oral hearing which will be a matter for An Bord Pleanála to decide.

4.58 58– Leinster Street North Residents Group

4.58.1 Submission – Phibsborough and adjacent streets

The submission welcomed the improvements to bus and cycle infrastructure. However, the submission endorsed the submission from Senator Marie Sherlock to An Bord Pleanála and raised the following issues:

1. Lack of public consultation on proposed traffic management measures
2. Increase in traffic flows and associated safety and journey time impacts
3. Air quality

4.58.2 Response

Detailed responses to the issues raised in this submission are provided in section 2.4.3 of this report.

4.59 59 – Carey Lening & David Benbennick

4.59.1 Submission – Phibsborough and adjacent streets

The submission welcomed proposals on Navan Road and Stoneybatter, including the introduction of segregated cycle lanes, along with widening of footpaths and improvements to public realm at Stoneybatter. However, the submission objected to the traffic management measures to be implemented outside of the Core Bus Corridor route, due to the impact on Connaught Street and surrounding communities.

The submission requested an oral hearing and raised the following issues:

1. Planning documentation
2. Lack of public consultation on proposed traffic management measures
3. Increase in traffic flows and associated safety and journey time impacts
4. Use of appropriate baseline modelling
5. Flawed classification system
6. Inadequate referencing and lack of consistency in documentation
7. Discrepancies in drawings
 - Charleville Road
 - Annamoe Terrace and Road
8. Cabra Road / North Circular Road junction (@ St Peter’s Church)
9. Cumulative impacts
10. Data Collection
 - Traffic and Transportation
 - Air Quality

- Noise and Vibration
- Road Safety Audits

4.59.2 Response to submission

Detailed responses to the issues raised by this submission are provided in sections 2.10.2 and 2.5.3 of this report.

4.60 60- Lorna Leatham

4.60.1 Submission – Navan Road

The submission raised the following issues:

1. Consultation process
2. Old Cabra Road Bus Gate
3. Alternative measures (congestion charge)
4. Removal and provision of trees
5. Design justification

Submission stated that the Proposed Scheme has been developed without a systematic review and approach.

6. Boundary treatments

Clarity required on information regarding a ‘like for like’ solution and what will replace mature/established trees.

7. CPO process
8. Impact on property value
9. Noise and vibration
10. Air quality
11. Bus journey times and reliability
12. Change in travel demand and patterns of travel due to COVID-19 pandemic

The submission ends with a request for an oral hearing and postponement of the planning application process.

4.60.2 Response to Observations Raised

Detailed responses to the issues raised in points 1 to 4 and 7 to 12 of this submission are provided in sections 2.10.2, 2.3.3 and 2.2.3 of this report.

5. Design justification

As stated in Chapter 1 Introduction of the EIAR:

“the aim 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.

The Proposed Scheme will greatly improve transport services for all that live along the route of the Proposed Scheme, including on Navan Road, by providing significantly improved sustainable transport options.

The Proposed Scheme will 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. In order to achieve the Proposed Scheme objectives along this section of the corridor on the R147 Navan Road, as described in paragraph 4.5.4.1 of Chapter 4 of Volume 2 of the EIAR, “*the Proposed Scheme will generally consist of a bus lane and general traffic lane in each direction, with one-way cycle tracks alongside the proposed inbound and outbound bus lanes.*”

Section 4.6 of Chapter 4 ‘Proposed Scheme Description’ of the EIAR outlines the main infrastructure elements associated with the Proposed Scheme.

The cross-sectional design of the mainline has been developed to achieve the desirable width criteria contained within the PDGB and TII Publications wherever reasonably practicable as outlined in table 4.29, table 4.30 and table 4.31.

At the location of 149 Navan Road, the widths of each infrastructure element conform with the desirable/preferred widths as outlined in section 4.6 of the EIAR and are summarised in Table 4.60.1.

Table 4.60.1: Summary of key infrastructure element widths

Element	Width
Bus lane:	3.0m
Traffic lane:	3.0m
Cycle track:	2.0m (including 0.25m kerb)
Footpath:	2.0m

6. Boundary Treatments

Chapter 4 Proposed Scheme Description of the EIAR provides details on accommodation works and boundary treatments for the Proposed Scheme and confirms that boundary treatment works are to be replaced on a ‘like for like’ basis.

Section 4.6.18.1 ‘Summary of Accommodation Works and Boundary Treatment’ states the following:

“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, unless a section of street can benefit from urban improvement appropriate to the area.”

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.

4.61 61 – Lissan Coal Company

This submission matches that of LCC Properties. Refer to section 4.57 of this report for a summary of the issues raised and responses to these issues.

4.62 62 – David Little

4.62.1 Submission - Old Cabra Road

The submission raised the following issues:

1. Planning documentation
2. Old Cabra Road Bus Gates
3. Safety

4. Support for the pedestrian crossing at Glenbeigh Road/Old Cabra Road junction

5. Traffic lights

The submission stated that the proposed traffic lights at the Glenbeigh Road/ Old Cabra Road junction with ‘green times limited to traffic movements’ is counterproductive and will result in traffic building up on Glenbeigh Road. It instead stated that a better option would be to install traffic filter lights at the junction of Blackhorse Avenue and Glenbeigh Road.

6. New Go Fuel Station

The submission stated that the granting of the new Go Fuel station will have a negative impact on the aim of the Proposed Scheme and should be considered.

7. Enforcement

The submission suggested that adequate policing of traffic by An Garda Síochána in term of speed and general compliance is needed for the scheme to be successful.

4.62.2 Response to submission

Detailed responses to the issues raised in points 1 to 3 of this submission are provided in section 2.10.2 and 2.3.3 of this report.

4. Support of the pedestrian crossing at Glenbeigh Road/ Old Cabra Road junction

The NTA welcome the support for the proposed pedestrian crossing.

5. Traffic lights

It is noted in section 4.3 of Chapter 4 Proposed Scheme Description of Volume 2 of the EIAR “*that new traffic signal controls are proposed at the Old Cabra Road/Glenbeigh Road junction, which will enable general traffic flows turning left or right onto Old Cabra Road (local access only) to be controlled (mitigating the risk of general traffic using Glenbeigh Road as a short-cut route. As noted in section 2.2.3 traffic flow on Glenbeigh Road is forecast to reduce as a result of the Proposed Scheme.*”

6. New Go Fuel Station

The impact has been assessed. Section 10.4.4.2.2.2 of Chapter 10 of Volume 2 of the EIAR states the following:

“The impact on this business is assessed as Negative, Very Significant and Long-Term during construction and operation of the Proposed Scheme.”

This is as a result of the proposed bus gates on Old Cabra Road.

As noted in table 6.62 of Chapter 6 of Volume 2 of the EIAR, there is a forecasted reduction of 947 PCUs at AM peak hour on Old Cabra Road which has been determined as an overall Positive, Significant and Long-term effect. As per table 6.67 of Chapter 6, there is a forecasted reduction of 1136 PCUs at PM peak hour on Old Cabra Road which has been determined as an overall Positive, Very Significant and Long-term effect.

7. Enforcement

The NTA acknowledges the comments raised in relation to enforcement. Enforcement of road traffic laws, including turning bans at junctions and Bus Gates is a matter for An Garda Síochána.

4.63 63 – Antanas Luobikis & Ausra Luobikiene

4.63.1 Submission – Phibsborough and adjacent streets

The submission raised concerns about the traffic management proposals on Monck Place, Annamoe Terrace and Charleville Road. The submission requested an oral hearing and raised the following issues:

1. Increased traffic flows and associated safety and journey time impacts

2. Cabra Road / North Circular Road junction (@ St Peter's Church)

4.63.2 Response to submission

Detailed responses to the issues raised in this submission are provided in section 2.5.3 of this report.

4.64 64 – Grainne Lynch

4.64.1 Submission – Phibsborough and adjacent streets

The submission raised the following issues:

1. Lack of public consultation on proposed traffic management measures
2. Cabra Road / North Circular Road junction (@ St Peter's Church) (Access to 22 Avondale Road)
3. Increased traffic flows and associated safety and journey time impacts
4. Noise pollution

4.64.2 Response to submission

Detailed responses to the issues raised in this submission are provided in section 2.5.3 of this report

4.65 65 – Ciarán Mac Anraoi

4.65.1 Submission – Stoneybatter and adjacent streets

The submission recognised that change is necessary to improve the bus service, however it noted the following issues:

1. Support for northbound/outbound bus infrastructure

The submission noted that the plan for buses travelling out of Dublin will promote the quality and speed of the bus service and therefore result in a greater amount of people using public transport. The submission also stated that the plans will reduce delays to buses at King Street North/Blackhall Place junction and the Prussia Street/ Manor Street/ Aughrim Street junction, and provide viable alternatives for those wishing to use their car to access local amenities.

2. Impact on Prussia Street, Manor Street and Stoneybatter (southbound Bus Gate)
3. Removal of Parking and Loading Bays from Prussia Street, Manor Street, Stoneybatter and St Joseph's Road
4. Bus stop locations

The submission stated that most of the amended locations of bus stops is an improvement as they are more evenly spread. However, it suggested that the inbound bus stops 1713 and 1909 on Manor Street and Prussia Street respectively, are too far apart and the outbound bus stops 1649 and 1911 are too far apart and all need re-examined.

4.65.2 Response to submission

Detailed responses to the issues raised in points 2 and 3 of this submission are provided in section 2.4.3 of this report.

1. Support for northbound/outbound bus infrastructure

The NTA welcomes the support noted in the submission.

4. Bus stop locations

Section 4.6.4.5 of Chapter 4 of Volume 2 of the EIAR states the following:

“To improve the efficiency of the bus service along the Proposed Scheme the position and number of bus stops has been evaluated as part of a bus stop review.”

A Bus Stop Review report has been completed for the Proposed Scheme (refer to Appendix H of the Preliminary Design Report provided in the supplementary information).

As noted in section 1 of the Bus Stop Review report:

“The purpose of the process was to review the locations of the existing Dublin Bus stops and to determine whether a stop should be removed, relocated, or remain where it is. This exercise was carried out to optimise the performance of the bus services on the Proposed Scheme by reducing the journey time of the bus service, increasing the walking catchment of the bus stops and ensuring that key trip attractors located along the route are sufficiently covered within the catchment of bus stops.”

As noted in section 5 of the Bus Stop Review report:

“The main principles considered as part of the review were as follows:

- *Aim to achieve a bus stop spacing of 400m in suburban locations, and 250m in urban centres*
- *Locate bus stop as close as possible to nearest junction/pedestrian crossing*
- *Locate bus stop downstream of junction rather than upstream*
- *Consider space requirements to provide bus stop including shelter, waiting area, cycle lane and footpath provision and information displays*
- *Review existing and proposed boarding & alighting volumes to determine the usage of the bus stop*
- *Consider the potential for interchange with orbital bus services proposed as part of the New Dublin Area Bus Network.”*

The bus stop review methodology included consideration of the capacity of each proposed bus stop to cater for the projected bus numbers. In a number of locations, existing and proposed bus stops were rationalised based on best practice principles related to bus stop placement.

The reason for the decision to amend a bus stop location or remain as existing is noted in Appendix B of the Bus Stop Review Report. It states that stop 1713 (Inbound Manor Street) location will not be amended as it is *“well located for spacing to stops upstream and downstream, and with sufficient footpath width to accommodate cyclists and bus shelter.”*

It states that stop 1909 (Inbound Prussia Street) will move 30m south as *“this location allows for more space for waiting passengers to congregate. Stop 1649 (outbound Manor Street) will move 20m north as this location facilitates the provision of a toucan crossing at the location of the existing stop. Stop 1911 (outbound Prussia Street) location will not be amended as this location serves as an important interchange with stops on the North Circular Road. It was decided to keep the stop before the junction, due to the distance from the previous stop.”*

4.66 66 – Linda Marshall

4.66.1 Submission- Mill Road

The submission raised the following issues, which are numbered for ease of reference:

1. The submission stated that proposals for outbound bus stops at both River Road and Millstead on N3, which are 300m apart are excessive. The submission stated that provision of a bus stop at Mill Road will encourage commuters to park all day in Millstead Estate, causing nuisance to residents, and increase footfall on Mill Road, which may result in anti-social behaviour.
2. The submission noted that Millstead residents are totally opposed to the “heinous” suggestion of a pedestrian ramp and steps from Mill Road to N3 to overhang Millstead Estate, stating it would greatly affect the tranquil amenity of the estate and privacy will be completely compromised.

3. The submission requested consideration of putting a bus stop on the N3 at main entrance to Connolly Hospital, noting having a second pedestrian entrance at Mill Road is unnecessary. The submission suggested a pedestrian flyover to access the location adjacent to Connolly Hospital.
4. The submission stated that a lift would be a more acceptable form of access should the bus stop be located at Millstead.
5. The submission also stated that the N3 upgrade should be located further north away from Millstead Estate where there are no residential dwellings.
6. The submission stated that no works should be carried out within Millstead Estate.
7. The submission also noted that consideration should also be given to relocating the Mill Road stop to the underpass near the Garda station, which would better serve Waterville, Clonsilla Road and other areas, negating the need for an “ugly” ramp at Mill Road.
8. The submission noted that consideration should be given to continuing the bus service through Blanchardstown village, and added that any reduction in service will affect businesses and inconvenience commuters and locals.
9. Pedestrian Ramp Boundary Wall

4.66.2 Response to submission

A detailed response to point 9 of this submission is provided in section 2.6.3 of this report.

1. As noted in section 6.4.6.1.3.3 Bus Infrastructure of Chapter 6 Traffic Transport of Volume 2 of the EIAR, “*a key piece of infrastructure proposed on Section 2 as part of the Proposed Scheme is the provision of a pair of inbound and outbound stops on N3 Navan Road. The bus stops would be accessed by new pedestrian ramps and steps (RW07), which would rise from Mill Road up to the higher level of N3 Navan Road. The new bus stops would help to serve both Connolly Hospital and Blanchardstown Village.*

*The provision of the new stops close to Mill Road, along with the improvements to facilities at the existing stops in Section 2 is assessed as providing an overall **High positive** impact for bus passengers. This aligns with the overarching aim to provide enhanced bus infrastructure on the corridor, and will result in a **Positive, Moderate and Long-term** effect on this section.”*

As noted in Appendix H Bus Stop Review of the Preliminary Design Report, “*additional bus stops on the N3 dual carriageway will increase catchment.*” Refer to Figure 4.66.1 showing outbound catchment for proposed Mill Road Bus Stop.

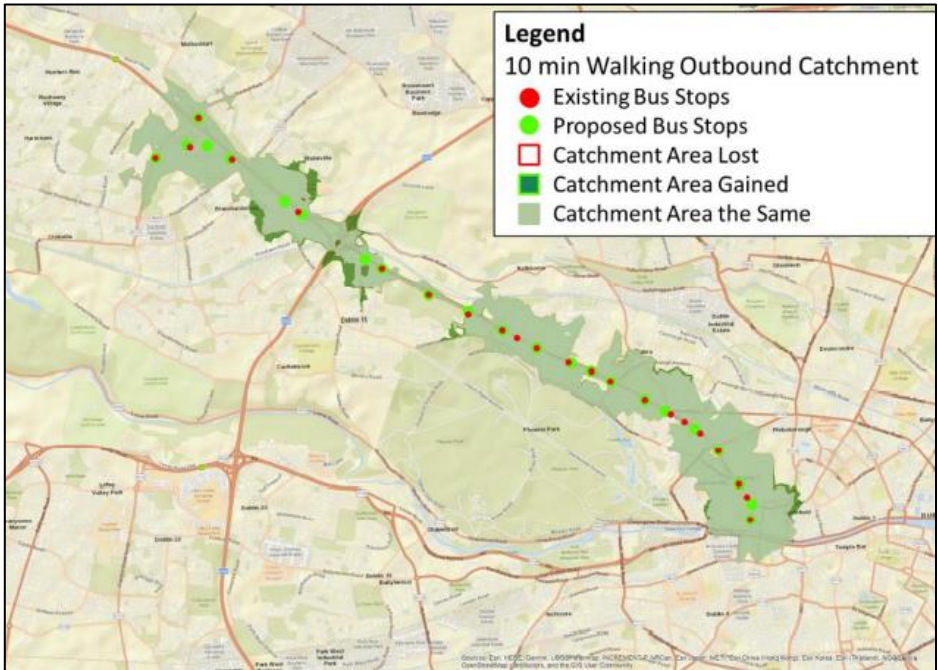


Figure 4.66.1: 10 Minute Walking Outbound Catchment (as taken from Bus Stop Review report)

In addition, the outbound bus stop at River Road (which is being relocated closer to Old Navan Road) facilitates interchange with bus services on the adjacent Old Navan Road.

- 2. As noted in section 17.5.2.1 Review of Photomontages of Chapter 17 Landscape and Visual of Volume 2 of the EIAR, “*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 proposed views are shown with proposed planting at approximately 10 – 15 years post completion of the Construction Phase.*”

This below text describes the Proposed Scheme changes as illustrated in the photomontage. The photomontages are as included in figure 17.2 in Volume 3 of the EIAR.



Figure 4.66.2: View from Millstead – Existing Situation

Figure 4.66.2 “shows the existing view taken from Millstead looking northeast across the road. The view looks out over a small area of grassed open space on the far side of the road, towards a belt of mature trees, which separate the area from the N3 and provide a backdrop to the view. The character is of a residential street with substantial mature trees enclosing the view”.



Figure 4.66.3: View from Millstead – As proposed

Figure 4.66.3 “shows the proposed view from Millstead looking northeast across the road. The primary changes in the view are the loss of mature trees along the edge of the N3, in the background of the view, and the introduction of replacement tree planting along a similar alignment. There would be a minor negative change to the character and visual amenity of the view which will reduce over time as the planting matures.”

Section 17.4.4.1.2 of Chapter 17 Landscape and Visual of Volume 2 of the EIAR states the following:

“The Operational Phase of the Proposed Scheme involves changes primarily to Mill Road / N3 overbridge area with provision of ramp and step access to Mill Road via Tolka Valley Park and open space adjacent to Millstead and localised changes to sections of road boundary. Trees will be lost during the Construction Phase, and the effect of this permanent loss will also be experienced during the Operational Phase. However, some replacement / compensatory planting will be provided which will reduce effects over the long-term. The Proposed Scheme will not alter the overall townscape / streetscape character along this section of the Proposed Scheme. The baseline townscape is of low sensitivity. The magnitude of change in the baseline environment is medium. The potential townscape / streetscape effect of the Operational Phase is assessed to be Negative, Slight and Short-term, becoming Neutral, Slight, Long-Term.”

3. Section 4.6.4.5 of Chapter 4 of Volume 2 of the EIAR states the following:

“To improve the efficiency of the bus service along the Proposed Scheme the position and number of bus stops has been evaluated as part of a bus stop review.”

A Bus Stop Review report has been completed for the Proposed Scheme (refer to Appendix H of the Preliminary Design Report provided in the supplementary information).

As noted in Appendix H Bus Stop Review of the Preliminary Design Report, “additional bus stops on the N3 dual carriageway will increase catchment.” Refer to Figure 4.66.4 showing inbound catchment gained for proposed Mill Road Bus Stop, which serves both Blanchardstown Village and Connolly Hospital.

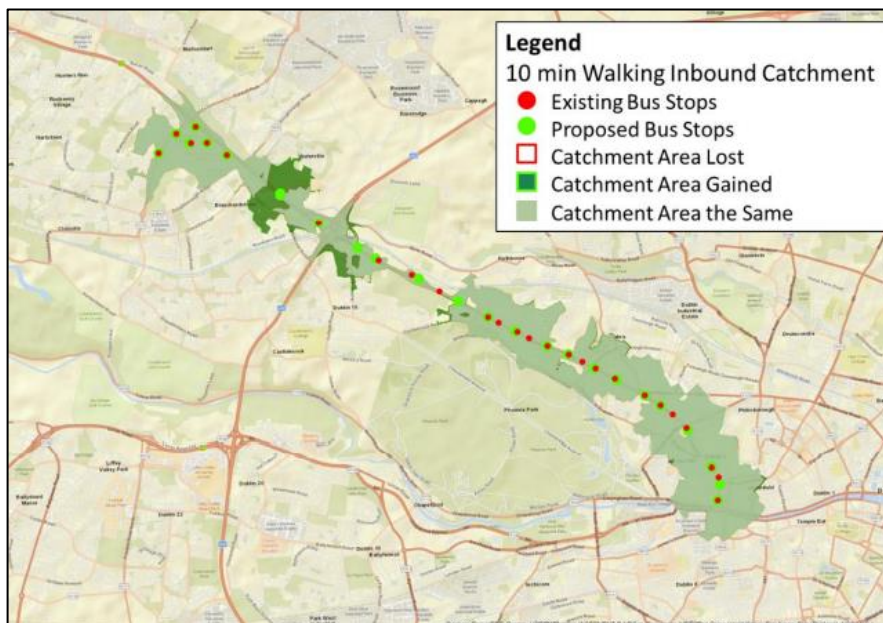


Figure 4.66.4: 10 Minute Walking Inbound Catchment (as taken from Bus Stop Review report)

As noted in section 1 of the Bus Stop Review report:

“This exercise was carried out to optimise the performance of the bus services on the Proposed Scheme by reducing the journey time of the bus service, increasing the walking catchment of the bus stops and ensuring that key trip attractors located along the route are sufficiently covered within the catchment of bus stops. In a number of locations, existing and proposed bus stops were therefore rationalised based on best practice principles related to bus stop placement. The outcome of this study was to develop a more efficient route which would attract more passengers by creating a wider population catchment and offering a shorter journey time to destinations.”

Consequently, location of an inbound bus stop at Mill Road is the preferred location as a result of the bus stop review for the Proposed Scheme.

4. Provision of a pedestrian ramp is preferable to a lift as it allows for a free flow of movement of pedestrians that do not wish to avail of steps. There is also a lower level of maintenance needed with a ramp as opposed to a lift.
5. As noted in Chapter 3 Reasonable Alternatives of Volume 2 of the EIAR:

“In the Updated Draft Preferred Route Option (November 2020), the pedestrian ramps on the north side of the N3 Dual Carriageway (RW07A) were identified on the eastern side of Mill Road (Option 1). The baseline environment to the east of Mill Road is in close proximity to the River Tolka and Alluvial Woodland which is a priority habitat of international importance. The baseline environment to the west of Mill Road includes an existing Irish Water pumping station and an archaeological monument (RMP: DU013-035: Mill - unclassified). The Fingal County Council (FCC) Local Development Plan 2017-2023 Objective WQ05 (FCC 2017) identifies a 30m wide riparian buffer on either side of all watercourses outside urban centres. As part of consultation on the Updated Draft PRO, on 29 January 2021, Fingal County Council (FCC) raised concerns that the location of pedestrian ramps to the east of Mill Road would result in the loss of significant ecological habitat.

Following design optioneering by the BusConnects Infrastructure team, the pedestrian ramps to the north of the N3 Dual Carriageway (RW07A) were relocated from east of Mill Road to the west of Mill Road (Option 2). The design of the pedestrian ramp incorporates artificial lighting into the structure to avoid impacts on protected species.

Overall, both the options (east or west of Mill Road) for the pedestrian ramps to the north of the N3 Dual Carriageway (RW07A) have the potential for adverse environmental impacts due to the proximity of the River Tolka. However, the western side of Mill Road (Option 2) contains less dense woodland and there is a larger distance between the preferred location for RW07A and the embankment of the River Tolka than the distance available on the eastern side of Mill Road.”

In addition, it is noted in section 4.6 Horizontal Alignment of the Preliminary Design Report:

“The alignments of the westbound and eastbound carriageways of the N3 are proposed to be amended to move a section of both carriageways into the existing central reservation. The width of the central reserve is proposed to be reduced from approximately 8.8m to 2.7m at its narrowest point at Ch. 1+580. The westbound edge of carriageway (offside) moves north a maximum of 5.1m at Ch. 1+580 with the eastbound edge of carriageway (offside) moving south a maximum of 3.1m at Ch. 1+440. The current alignment will be amended, and the central reserve width will be reduced in order to minimise the impact of the provision of additional bus lanes, bus stops and pedestrian ramps and steps on Millstead Estate, the properties at Herbert Road and the existing River Tolka culvert structure, adjacent to BR02 Mill Road Bridge.”

Consequently, the impact on Millstead as a result of the Proposed Scheme design has been minimised.

6. As noted in section 5.5.4.1.2.3 of Chapter 5 Construction of Volume 2 of the EIAR:

To the south of the N3 dual carriageway, a pedestrian ramp will be constructed to the east of Mill Road (RW07- A). These works will be carried out simultaneously with the Mill Road Bridge (BR02) widening. The southern access works will be divided into three sections:

- *Southern approach ramp: The southern access will involve underpinning or temporary supporting of the adjacent wall during excavation and construction of the new approach ramp. Extensive surveys of the existing wall will be required in advance of construction works commencing to inform the construction method. Access for these works will be from Mill Road with lane closures required for tie-in works.*
- *Pedestrian ramp adjacent to N3: The pedestrian ramp will be constructed with access from the N3 dual carriageway. Initially the area will be excavated to formation level. The retaining walls will then be constructed with the areas backfilled to finished level as the walls are being constructed.*
- *Stepped access: The stepped access will be constructed from the bottom, up, with access to the works from both Mill Road and the N3.*

As noted the southern approach wall will be located on the Mill Road side of the existing boundary wall. Refer to section D-D and E-E in Figure 4.66.5 below.

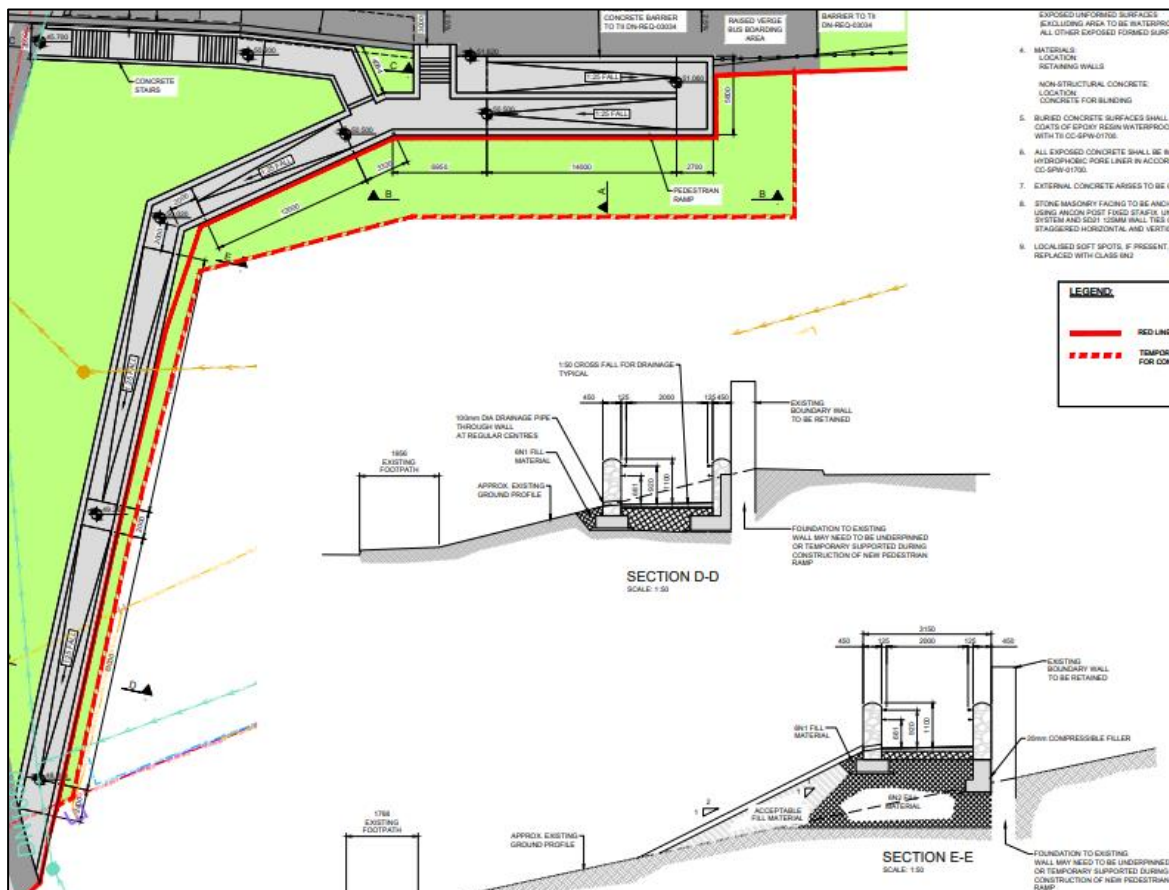


Figure 4.66.5: Extract from RW-07A Stairs and Access Ramp (Bridges and Major Retaining Structures drawings from Volume 3 of the EIAR)

As noted, the works for constructing the pedestrian ramps and steps will be undertaken from the N3 and Mill Road end. The permanent land take within Millstead is 168.8m² with temporary land take of 310.9m² to facilitate construction of the pedestrian ramps.

7. As noted in section 3.4.4.1 Mill Road Pedestrian Ramps / Steps of Chapter 3 Reasonable Alternatives of Volume 2 of the EIAR:

“The Proposed Scheme includes new pedestrian ramps between the N3 Dual Carriageway and Mill Road. Pedestrian ramp access will be provided to the north and south of the N3 Dual Carriageway to new bus stop locations. These proposals will enhance the public transport access for pedestrians along Mill Road, Edmund Rice College and Connolly Hospital.”

Section 3.3.2.1 of Chapter 3 of Volume 2 of the EIAR notes the following, with respect to the route options assessment for this section of the Proposed Scheme:

“From the three final route options identified in SAS 1, the Stage 2 MCA considered slight variations using different design concepts to identify the following scheme options:

- *Route 1A would connect R121 Junction at Blanchardstown Road South to the N3/M50 roundabout (junction 6) via the N3/Navan Road. Two sub-options (known as scheme options 1A1 and 1A2) were considered for this route option, both providing continuous bus lanes and traffic facilities on the inbound and outbound sections of the N3 Navan Road. Scheme Option 1A1 would require widening and land take including the provision of new structures and embankment construction. Scheme Option 1A2 would reduce the number of traffic lanes to allow for continuous bus lanes avoiding the need for private land take and only require widening into the verge/hard shoulder in places.*

- *Route 1B is similar to Route 1A however Route 1B would connect Blanchardstown Town Centre to the N3/M50 roundabout (junction 6) via the N3/Navan Road from the Snugborough Junction. Two sub-options (known as scheme options 1B1 and 1B2) were considered for this scheme option which are similar to the sub-options considered for Route 1A, albeit on a shorter section of the N3 Navan Road between Snugborough Junction and N3/M50 roundabout (junction 6).*
- *Route 1H would connect Blanchardstown Town Centre to the N3/M50 roundabout (junction 6) via the N3/Navan Road and Main Street (Blanchardstown Village). Two sub-options (known as scheme options 1H1 and 1H2) were considered for this scheme option. Scheme Option 1H1 proposals would incorporate exclusive bus facilities for the majority of both the inbound and outbound carriageways from Blanchardstown Town Centre to the Dunsink Lane/Auburn Avenue junction via Blanchardstown Village. Scheme Option 1H2 proposals would incorporate a variation to the 1H1. Segregated bus lanes would be provided in both directions along the N3 section of the route. Between the Navan Road/N3 junction and Blanchardstown Shopping Centre, a shared bus and cycle lane would be provided in the inbound direction. In the outbound direction, a shared bus and cycle lane would be provided where possible to avoid lane take.*

Each scheme option was evaluated using a multi-criteria assessment (MCA) with one of the primary criteria being ‘Environment’, under which there was a number of sub-criteria which each scheme option was considered against comparatively.

Notwithstanding that the MCA identified disadvantages in environmental criteria with scheme option 1B1 (hydrology, flora and fauna) when compared other scheme options, it offered the shortest journey time, scored the highest in terms of Lane Use Integration (with the Fingal County Council Snugborough Interchange Scheme) and it scored the highest in Traffic Network Integration (least potential to impact on existing traffic lanes). Overall, scheme option 1B1 scored highest and was therefore brought forward into the Emerging Preferred Route.”

Figure 4.66.6 below is of Image 3.12 from Chapter 3 of the EIAR, showing route option 1B1.

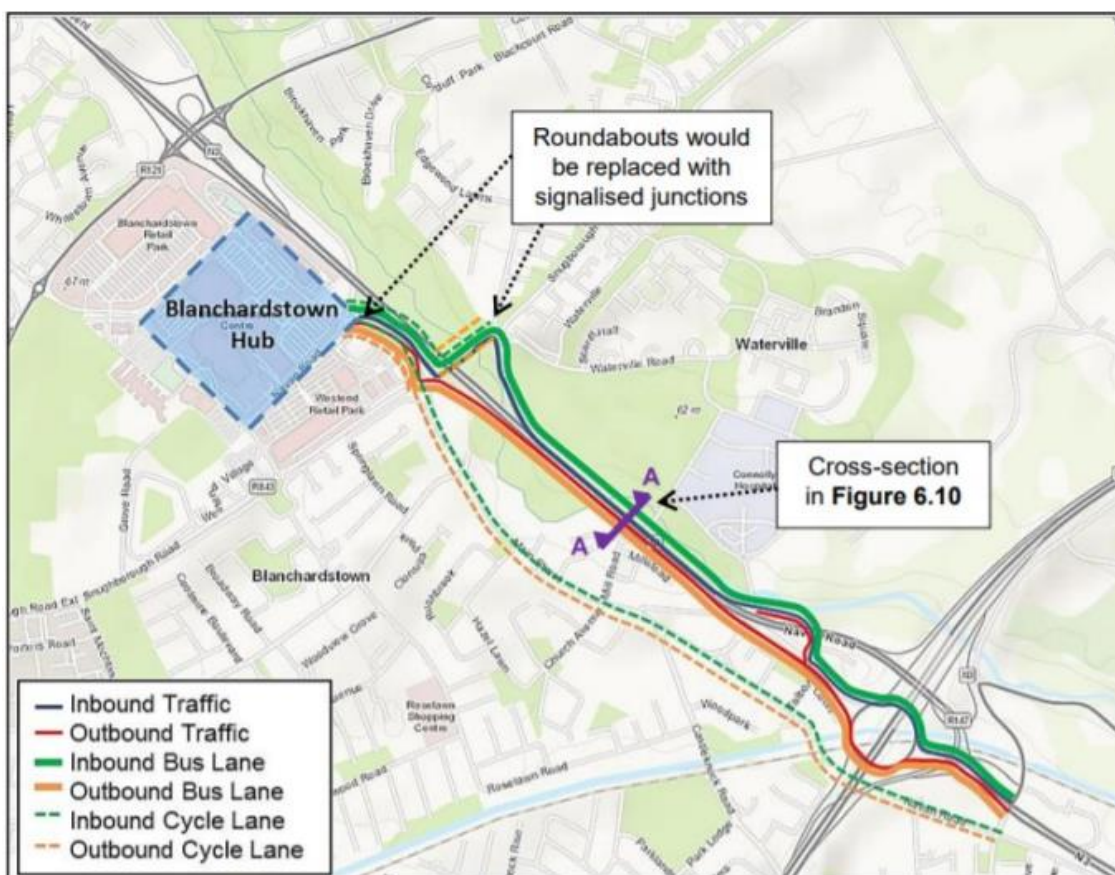


Figure 4.66.6: Image 3.12 Scheme Option 1B1 (Figure 6.9 Route Options Assessment (2018))

Consequently, the N3 section between Snugborough Road junction and the N3/ M50 junction was chosen as the preferred route for this section of the Blanchardstown to City Centre Core Bus Corridor Scheme, with bus stops located to serve this route.

8. The routing of bus services through Blanchardstown Village is not part of the proposed Blanchardstown to City Centre Core Bus Corridor Scheme.

4.67 67 – Councillor Ray McAdam

4.67.1 Submission – Various

Councillor Ray McAdam represents the communities of Stoneybatter, Infirmary Road, Arbour Hill, Montpellier and the Rathdown Road districts. The submission requested an oral hearing and raised the following issues on behalf of local residents:

1. Impact on Prussia Street, Manor Street and Stoneybatter
2. Removal of Parking and Loading Bays from Prussia Street, Manor Street, Stoneybatter and St Joseph’s Road
3. Impact on St Joseph’s Road, Oxmantown Road, Manor Place, Cowper Street, Aughrim Place, Arbour Hill, Montpellier Hill, Ard Righ Road and Infirmary Road
4. Impact on King Street North, George’s Lane, Brunswick Street North and Kirwan Street
5. Air Quality
6. Old Cabra Road Bus Gates
7. Increase in traffic flows and associated safety and journey time impacts
8. Carbon emissions
9. Bus services

The submission stated that the following changes to the bus services will impact residents of North Circular Road:

- No 37 being replaced by N2 and will access O’Connell Street via New Cabra Road
- No 70 being replaced and the new service will not serve Manor Street Area
- No 46A will no longer run and will be replaced with an infrequent service from Heuston Station

4.67.2 Response to submission

Detailed responses to the issues raised in points 1 to 8 of this submission are provided in section 2.4.3, 2.3.3, 2.5.3 and 2.10.2 of this report.

9. Bus Services

The provision and improvement of the bus services in the GDA is constantly under review by the NTA. However, the provision or removal of bus services is not part of the scope of the Proposed Scheme planning application. The submission regarding the impact of changes to the bus services on North Circular Road has been forwarded to the appropriate NTA department.

4.68 68 –Councillor Eimear McCormack

4.68.1 Submission- Various

Councillor Eimear McCormack raised the following issues on behalf of local residents:

1. Increased traffic flow and associated safety and journey time impacts
2. Old Cabra Road Bus Gate

3. Air quality and noise pollution
4. Safety
5. Castleknock Road/ Blackhorse Avenue junction
6. Removal of Ashtown Roundabout
7. Loss and provision of trees
8. Bus stops

4.68.2 Response to submission

Detailed responses to the issues raised by this submission are provided in sections 2.5.3, 2.3.3, 2.8.3 and 2.2.3 of this report.

4.69 69 – Brendan McElhinney

4.69.1 Submission – Phibsborough and adjacent streets

The submission confirmed support for the Proposed Scheme.

4.69.2 Response to submission

A detailed response to the points raised by this submission is provided in section 2.5.3.4 of this report.

4.70 70 – Eileen McGoldrick

4.70.1 Submission – Phibsborough and adjacent streets

The submission confirmed support for the Proposed Scheme.

4.70.2 Response to submission

A detailed response to the points raised by this submission is provided in section 2.5.3.4 of this report.

4.71 71 – Anne McKee

4.71.1 Submission – Phibsborough and adjacent streets

The submission confirmed support for the Proposed Scheme.

4.71.2 Response to submission

A detailed response to the points raised by this submission is provided in section 2.5.3.4 of this report.

4.72 72 – John McKee

4.72.1 Submission – Phibsborough and adjacent streets

The submission confirmed support for the Proposed Scheme.

4.72.2 Response to submission

A detailed response to the points raised by this submission is provided in section 2.5.3.4 of this report.

4.73 73 – Seamus McKee

4.73.1 Submission – Phibsborough and adjacent streets

The submission confirmed support for the Proposed Scheme.

4.73.2 Response to submission

A detailed response to the points raised by this submission is provided in section 2.5.3.4 of this report.

4.74 74 – Donnacha McKenna

4.74.1 Submission – Phibsborough and adjacent streets

The submission confirmed support for the Proposed Scheme.

4.74.2 Response to submission

A detailed response to the points raised by this submission is provided in section 2.5.3.4 of this report.

4.75 75 – Lisa McKenna

4.75.1 Submission – Phibsborough and adjacent streets

The submission confirmed support for the Proposed Scheme.

4.75.2 Response to submission

A detailed response to the points raised by this submission is provided in section 2.5.3.4 of this report.

4.76 76 – Cory Mifsud

4.76.1 Submission – Phibsborough and adjacent streets

The submission confirmed support for the Proposed Scheme.

4.76.2 Response to submission

A detailed response to the points raised by this submission is provided in section 2.5.3.4 of this report.

4.77 77 – Adam Moore and Other

4.77.1 Submission – Phibsborough and adjacent streets

The submission confirmed support for the Proposed Scheme.

4.77.2 Response to submission

A detailed response to the points raised by this submission is provided in section 2.5.3.4 of this report.

4.78 78 – Miriam Moore

4.78.1 Submission – Phibsborough and adjacent streets

The submission confirmed support for the Proposed Scheme.

4.78.2 Response to submission

A detailed response to the points raised by this submission is provided in section 2.5.3.4 of this report.

4.79 79 – Margaret Murray and Others

4.79.1 Submission – Various

The submission stated that the Proposed Scheme will encourage people onto public transport, however stated that this should not be at the expense of residents and their ability to move freely within their community. The submission requested an oral hearing and raised the following issues:

1. Consultation process

2. Planning documentation
3. Castleknock Road / Blackhorse Avenue junction
4. Old Cabra Road Bus Gate
5. Impact on St Joseph's Road, Oxmantown Road, Cowper Street, Aughrim Place, Arbour Hill, Montpellier Hill and Infirmary Road
6. Increased traffic on North and South Quays
7. Consultation with An Garda Síochána

The submission questioned if An Garda Síochána have been consulted on the traffic management issues that the scheme will cause.

8. Bloom Festival

The submission questioned how traffic will flow during the Bloom Festival in the Phoenix Park as it attracts thousands of visitors.

9. Loss and provision of trees
10. Road safety
11. Our Lady Help of Christians Parish Catholic Church
12. Providing for mobility impaired users

4.79.2 Response to submission

Detailed responses to the issues raised in points 1 to 5 and 9 to 12 of this submission are provided in sections 2.10.2, 2.8.3, 2.3.3, 2.4.3 and 2.2.3 of this report.

6. Increased traffic on North and South Quays

As noted in section 6.2.2.1 of Chapter 6 of Volume 2 of the EIAR, “to determine the potential 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 Transport Infrastructure Ireland’s (TII) most recent Traffic and Transport Assessment Guidelines (TII 2014).

This document is considered best practice guidance for the assessment of transport impacts related to changes in traffic flows due to proposed developments and is an appropriate means of assessing the impact of general traffic trip redistribution on the surrounding road network.

The Traffic Impact Assessment follows the Traffic and Transport Assessment Guidelines and offers an impartial description of the likely impacts of the Proposed Scheme, outlining both its positive and negative aspects. The Traffic Impact Assessment has been reported as part of the Environmental Impact Assessment for the Proposed Scheme.”

The impact on the North and South Quays has been assessed in the traffic assessment in Chapter 6 of Volume 2 of the EIAR, the results are as follows:

Ellis Quay

As noted in table 6.65 at AM Peak Hour traffic is forecast to increase by 208 PCUs per hour. For the PM peak hour, as noted in Table 6.70 traffic is forecast to increase by 187 PCUs per hour.

Arran Quay

As noted in table 6.65 at AM Peak Hour traffic is forecast to increase by 157 PCU’s per hour. For the PM peak hour the change in traffic flow is less than the 100 PCU threshold, which represents a very low level of change in traffic flow

Sarsfield Quay

As noted in table 6.70 at PM Peak Hour traffic is forecast to increase by 126 PCU's per hour. For the AM peak Hour the change in traffic flow is less than the 100 PCU threshold, which represents a very low level of change in traffic flow.

Wolf Tone Quay

As noted in table 6.70 at PM Peak Hour traffic is forecast to increase by 463 PCU's per hour. For the AM Peak Hour the change in traffic flow is less than the 100 PCU threshold, which represents a very low level of change in traffic flow.

Victoria Quay

As noted in table 6.65 at AM Peak Hour traffic is forecast to increase by 183 PCU's per hour. For the PM peak hour, as noted in Table 6.70 traffic is forecast to increase by 361 PCU's per hour.

Usher's Island

As noted in table 6.65 at AM Peak Hour traffic is forecast to increase by 288 PCU's per hour. For the PM peak hour, as noted in Table 6.70 traffic is forecast to increase by 388 PCU's per hour.

Usher's Quay

As noted in table 6.64 at AM Peak Hour traffic is forecast to decrease by 129 PCU's per hour. For the PM peak hour, as noted in Table 6.69 traffic is forecast to decrease by 213 PCU's per hour.

To determine the impact that these increased traffic flows have on the surrounding area a further assessment has been undertaken in line with the thresholds detailed in section 6.4.6.2.8.2 Significance of the General Traffic Impact – diagram 6.48. Further assessment has been undertaken by way of a traffic capacity analysis on the associated junctions along the affected links that experience an increase in traffic flow (see section 6.4.6.2.8.7 General Traffic Impact Assessment of Chapter 6).

As noted in tables 20 to 24 in Appendix A6.4 Impact Assessments of Volume, these 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 Not Significant.

The only road where this is not the case is on Sarsfield Quay. It is noted in table 22 in Appendix A6.4, the Significance of Effect at the Sarsfield Quay/Wolfe Tone Quay/ Liffey Street West has been determined as "Slight" in relation to the Transport Impact Assessment. However, this Significance of Effect reduces to 'Not Significant' for the 2043 Junction Analysis as noted in table 23.

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.

7. Consultation with An Garda Síochána

As set out below, a robust traffic and transport assessment has been carried out on the Proposed Scheme.

Section 1.5 of Chapter 1 of Volume 2 of the EIAR states the following:

“As set out in the Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (August 2018) (hereinafter referred to as the “2018 Guidelines”), the 2014 EIA Directive requires that public and private projects that are likely to have significant effects on the environment shall be made subject to an assessment prior to development consent being given.”

Chapter 6 of the Environmental Impact Assessment Report (EIAR) has considered the potential traffic & transport impacts associated with the Construction and Operational Phases of the Blanchardstown to City Centre Scheme.

As noted in response to point 6 above, a robust assessment has been undertaken, with reference to Transport Infrastructure Ireland’s (TII) most recent Traffic and Transport Assessment Guidelines (TII 2014).

Section 4.3 Consultation with Prescribed Bodies and Other Consultee of the Non Technical Summary of the EIAR states the following:

“In addition to the public consultation on the Proposed Scheme, the BusConnects Infrastructure team undertook consultation during the preparation/ development of the EIAR with prescribed bodies and relevant non-statutory consultees. During the development of the EIAR, prescribed bodies (including the Department of Communications, Climate Action and the Environment, the Department of Transport, Dublin City Council, Fingal County Council, the Heritage Council) and relevant non-statutory consultees were provided with a report outlining the proposed approach to the environmental assessment and were invited to comment. Feedback from this consultation was also used to inform the EIAR and the preliminary design proposals, where appropriate.”

As noted in point 6 above, 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.

8. Bloom Festival

The impact of the proposed scheme on Phoenix Park has been assessed and detailed in section 2.3.3 of this report.

Traffic management with respect to specific events such as the Bloom Festival would be a matter for those overseeing and managing the festival.

4.80 80– Deirdre & Dermot Nagle

4.80.1 Submission – Navan Road & Old Cabra Road

The submission expressed its desire to see a project that benefits the whole community; however the submission requested an oral hearing and raised the following issues:

1. Support for the Proposed Scheme
2. Consultation process
3. Removal of Ashtown Roundabout
4. Utility works
5. Removal and provision of trees
6. Alternative measure (park and ride facilities)
7. Old Cabra Road Bus Gate

8. Compulsory Purchase Order (CPO) process
9. Noise and vibration
10. Providing for Mobility Impaired Users
11. Bus stops
12. Our Lady Help of Christians Catholic Parish Church

4.80.2 Response to submission

Detailed responses to the issues raised in this submission are provided in sections 2.2.3, 2.10.2 and 2.3.3 of this report.

4.81 81 – National Asset Management Agency

4.81.1 Submission – Whole Scheme

The submission raised the following issues:

1. Support for the Proposed Scheme
2. Alignment with other projects
3. Bus Stop locations
4. Bicycle Parking
5. Navan Road Parkway Station Cycle Infrastructure
6. Bus Connects Network Review

4.81.2 Response to submission

Detailed responses to the issues raised in this submission are provided in section 2.9.7 of this report.

4.82 82 - Navan Road Community Council (additional)

4.82.1 Submission – Navan Road

The Navan Road Community Council provided this additional submission during the second consultation period. The original submission is outlined in section 4.84 below. The additional points raised in this submission are as follows:

1. Consultation process
2. Utility works
3. Our Lady Help of Christians Parish Catholic Church
4. Bus stops (stop 1661)

4.82.2 Response to submission

Detailed responses to the issues raised in this submission are provided in section 2.2.3 and 2.10.2 of this report.

4.83 83- Navan Road Community Council

4.83.1 Submission – Various

The submission raised the following issues:

1. Support for the Proposed Scheme

2. Removal of Ashtown Roundabout
3. Removal and provision of trees
4. Alternative measures (park and ride facilities)
5. Old Cabra Road Bus Gate
6. Castleknock Road / Blackhorse Avenue Junction
7. Compulsory Purchase Order (CPO) Process
8. Alternative route options
9. Noise and vibration
10. Providing for mobility impaired users
11. Bus stops
12. Consideration of DART+ West
13. Change in travel demand and patterns of travel due to COVID-19 pandemic

4.83.2 Response to submission

Detailed responses to the issues raised in this submission are provided in section 2.2.3, 2.3.3, 2.8.3 and 2.10.2 of this report.

4.84 84 – Brianán Nolan

4.84.1 Submission - Phibsborough and adjacent streets

The submission welcomed proposals on Navan Road and Stoneybatter, including the introduction of segregated cycle lanes, along with widening of footpaths and improvements to public realm at Stoneybatter. However, the submission objected to the traffic management measures to be implemented outside of the Core Bus Corridor route, due to the impact on Connaught Street and surrounding communities.

The submission requested an oral hearing and raised the following issues:

1. Planning documentation
2. Lack of public consultation on proposed traffic management measures
3. Increase in traffic flows and associated safety and journey time impacts
4. Use of appropriate baseline modelling
5. Flawed classification system
6. Inadequate referencing and lack of consistency in documentation
7. Discrepancies in drawings
 - Charleville Road
 - Annamoe Terrace and Road
8. Cabra Road / North Circular Road junction (@ St Peter's Church)
9. Cumulative impacts
10. Data Collection
 - Traffic and Transportation
 - Air Quality

- Noise and Vibration
- Road Safety Audits

4.84.2 Response to submission

Detailed responses to the issues raised by this submission are provided in sections 2.10.2 and 2.5.3 of this report.

4.85 85 – Jennifer O’Brien & Anthony Barta

4.85.1 Submission – Stoneybatter and adjacent streets

The submission raised the following issues:

1. Impact on Prussia Street, Manor Street and Stoneybatter
2. Impact on St Joseph’s Road, Oxmantown Road, Manor Place, Cowper Street, Aughrim Place, Arbour Hill, Montpellier Hill, Ard Righ Road and Infirmary Road
3. Change in travel demand and patterns due to COVID-19 pandemic
4. Bus journey time and reliability
5. Local access routes
6. Landscaping and greening Stoneybatter
7. Consultation process
8. Planning documentation

4.85.2 Response to submission

Detailed responses to the issues raised in this submission are provided in sections 2.4.3 and 2.10.2 of this report.

4.86 86– Kieran O’Brien

4.86.1 Submission – Castleknock Road / Blackhorse Avenue Junction and Navan Road

The submission raised the following issues:

1. Castleknock Road / Blackhorse Avenue Junction
2. Consultation process
3. Alternative Route Options (Phoenix Park)

4.86.2 Response to submission

Detailed responses to the issues raised in this submission are provided in sections 2.8.3, 2.10.2 and 2.2.3 of this report.

4.87 87 – Nick & Susan O’Brien

4.87.1 Submission – Navan Road

The submission raised the following issues:

1. Loss and provision of trees
2. Road safety
3. Kempton Avenue junction

4.87.2 Response to submission

Detailed responses to the issues raised in this submission are provided in section 2.2.3 of this report.

4.88 88 – Éamon Ó’Ceallaigh

4.88.1 Submission – Old Cabra Road

The submission was submitted on behalf of the Old Cabra Road and Cabra Drive Residents Committee. The submission highlighted support for the general concept of the Proposed Scheme and recognised the benefits it would bring to the residents of the city and the environment. However, the submission raised the following issues:

1. Local Access

The submission stated that proposals for residential access arrangements along Old Cabra Road are extremely ambiguous and suggested that the planning documentation is not consistent and provided two conflicting options.

The submission noted that the following is stated in Section 4.5.5.1 of Chapter 4 of Volume 2 of the EIAR:

- *Local traffic will be prohibited to travel southbound on the northern portion of the Old Cabra Road*
- *Local access travelling northbound will only be allowed as far as the bus gate at the railway bridge*

The submission also noted that the above is indicated on the Traffic Signs and Road Marking drawings in Volume 3 of the EIAR.

However, the submission stated that the following text Chapter 10 contradicts the above.

The submission noted that the following is noted in section 10.4.4.1.2.2 of Chapter 10 of Volume 2 of the EIAR:

“The bus gate between Navan Road and Old Cabra Road Junction and the overbridge on Old Cabra Road will reduce non-residential access for private vehicles between these two points, only permitting access to buses, emergency vehicles and taxis, with adjacent footpaths and cycle tracks facilitating movement for pedestrians and cyclists. However as local access would still be available access to community facilities from private vehicles will remain, albeit the route length and journey time may increase for those choosing to use private vehicles.”

The submission objected to the proposed traffic management measures on Old Cabra Road as being too restrictive on local residents.

The submission affirmed that the proposed measures will lead to unnecessarily long circuitous routes when accessing and egressing their properties.

The submission stated they the residents have a long-standing legitimate right to unfettered vehicular access to their homes and such interference cannot be justified.

The submission proposed an alternative solution as outlined below.

In order to allow vehicular access for local residents along the full length of the Old Cabra Road in both directions, it is proposed to insert “and access” to the proposed exception plate to read “Except for public service vehicles, bicycles and access”.

The submission stated that the addition of ‘Access’ as an exemption would be in line with the Department of Transport, Tourism and Sport document on ‘regulatory signs’ which provides details of regulatory signs which may be used on roads in Ireland.

The submission suggested that the residents on Old Cabra Road and Cabra Drive be permitted local access. The submission stated this could be enabled by altering the ‘No Straight Ahead’ sign with a supplementary plate detailing the exception to the restriction.

The submission went on to state that section 5.9.4 of the document sets out details on the ‘No Straight Ahead’ sign RUS 011 which indicates that traffic is restricted from proceeding in the direction indicated.

The submission noted that the sign shall only be used in conjunction with a supplementary plate P 050 detailing exceptions to the restriction or Plate P 051 describing periods during which the restriction applies.

The submission noted that “Access” is a permitted exception.

2. Lack of public consultation on proposed traffic management measures
3. Old Cabra Road Bus Gates
4. Providing for mobility impaired users

4.88.2 Response to submission

Detailed responses to the issues raised in points 2 to 4 of this submission are in sections 2.5.3, 2.3.3 and 2.10.2 of this report.

1. Local Access

As noted in the submission, section 10.4.4.1.2.2 of Chapter 10 of the EIAR states:

“The bus gate between Navan Road and Old Cabra Road Junction and the overbridge on Old Cabra Road will reduce non-residential access for private vehicles between these two points, only permitting access to buses, emergency vehicles and taxis, with adjacent footpaths and cycle tracks facilitating movement for pedestrians and cyclists. However as local access would still be available access to community facilities from private vehicles will remain, albeit the route length and journey time may increase for those choosing to use private vehicles.”

This is consistent with the referenced text in Chapter 4 of the EIAR as access is available via the surrounding road network i.e. vehicular access between the two noted bus gates is available via Glenbeigh Road. Refer to Figure 4.88.1 below.

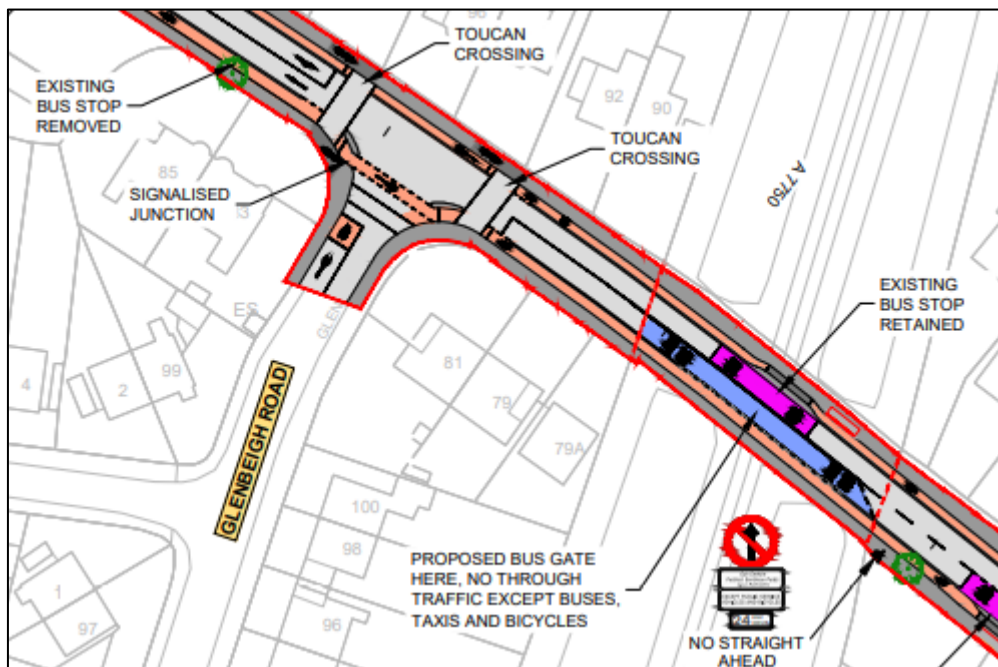


Figure 4.88.1: Extract from General Arrangement drawing

With respect to the proposed alternative measure of addition of “local access” text to the “No Straight Ahead” sign, it is not currently possible to facilitate access for local residents only by private vehicle as the current regulations is based on restricting classes of vehicles.

4.89 89 – Miriam O’Dwyer

4.89.1 Submission – Various

The submission stated that the introduction of a Core Bus Corridor seems to be a positive idea however is concerned about the impact it will have on Blackhorse Avenue and the local community. The submission raised the following issues:

1. Consultation process
2. Castleknock Road/ Blackhorse Avenue junction
3. Old Cabra Road Bus Gates
4. Parking

The submission stated that limited parking in Phoenix Park has affected the local area as the public tend to use the surrounding roads to park and commute onwards. The submission questioned where nurses and carers who make several daily home visits will park.

5. Noise pollution

The submission stated that residents will be greatly affected by noise and upheaval from the construction.

6. Utility works

The submission also questioned if consideration has been given to future pipe laying and utility works in the area to ensure they are coordinated with the Proposed Scheme to prevent ongoing disruption.

7. Future housing developments

8. Flood risk

The submission stated that there is an increased risk of flooding in the area due to green space being removed.

9. Removal and provision of trees

10. Bus accessibility

11. Alternative solutions

The submission suggested the following alternatives:

- Increase bus frequency at peak times
- Widen footpaths where possible and provide cycle/scooter lanes
- Monitor cyclists and scooter users who do not use the lanes provided
- Provide park and ride facilities that are affordable to citizens

4.89.2 Response to submission

Detailed responses to the issues raised in points 1 to 3 and 9 to 11 of this submission are provided in sections 2.10.2, 2.8.3, 2.3.3 and 2.2.3 of this report.

4. Parking

There is no impact on parking on Blackhorse Avenue. The Proposed Scheme at Blackhorse Avenue is at the junction of Castleknock Road and Blackhorse Avenue.

For details of impact on parking on Navan Road and Stoneybatter, refer to sections 2.2.3 and 2.4.3 of this report.

5. Noise pollution

The noise and vibration assessment is outlined in Chapter 9 Noise and Vibration of Volume 2 of the EIAR. The results of the noise and vibration assessment during construction is shown in figure 9.3 of Volume 3 of the EIAR. As shown in figure 9.3 the impact on Blackhorse Avenue during construction is assessed as “slight-moderate” to “not significant”.

6. Utility works

It is not within the remit of the BusConnects scheme to install new utilities. As stated in section 1.2 of Chapter 1 Introduction of Volume 2 of the EIAR:

“the aim of the Proposed Scheme is to provide enhanced walking, cycling and bus infrastructure on key access corridors in the Dublin region, which will enable and deliver efficient, safe, and integrated sustainable transport movement along these corridors.”

8. Flood risk

A site-specific Flood Risk Assessment (FRA) has been completed for the Proposed Scheme in accordance with the Department of the Environmental, Heritage and Local Government (DEHLG) and the Office of Public Works (OPW) Planning System and Flood Risk Management Guidelines for Planning Authorities.

The conclusion of the FRA in Appendix 13.2 of Volume 4 of this EIAR states the following:

“There are a number of historic flood events at different locations along or near to the Proposed Scheme. The Proposed Scheme is largely on existing roads and will result in minimal additional paved areas and will therefore not increase the risk of these events re-occurring compared to the current scenario.”

11. Alternative solutions

Increase bus frequency at peak times

Refer to response to point iv Planning above, which includes justification for the Proposed Scheme.

Widen footpaths where possible and provide cycle/scooter lanes

Section 1.1. of Chapter 1 Introduction of Volume 2 of the EIAR states the following:

“In addition to the improvements to bus journey times and journey time reliability, the Proposed Scheme will provide significant benefits for cyclists and pedestrians. The scheme design has been developed having regard to the relevant accessibility guidance and universal design principles so as to provide access for all users. The scheme will provide improved pedestrian crossing facilities along the route, with an increase in the number of signalised crossing points, and the provision of side road ramps.

The provision of dedicated cycling infrastructure along the Proposed Scheme as well as on parallel routes in some cases, will improve the level of service provided for cyclists along the route, making cycling trips safer and more attractive. In this regard, the Proposed Scheme delivers substantial elements of the National Transport Authority (NTA) Greater Dublin Area Cycle Network Plan (hereinafter referred to as the GDA Cycle Network Plan) (NTA 2013), much of which does not currently have adequate provision - as well as linking with other existing and proposed cycling schemes and sustainable transport modes, contributing towards the development of a comprehensive cycling network for Dublin.

Several public realm upgrades, including widened footpaths, high quality hard and soft landscaping and street furniture will be provided in areas of high activity, which will contribute towards a safer, more attractive environment for pedestrians.

The primary objective of the Proposed Scheme, therefore, is the facilitation of modal shift from car dependency through the provision of walking, cycle, and bus infrastructure enhancements thereby contributing to an efficient, integrated transport system and a low carbon and climate resilient City.”

Monitor cyclists and scooter users who do not use the lanes provided

The NTA acknowledges the comments raised in relation to enforcement. Enforcement of road traffic laws is a matter for An Garda Síochána.

Provide park and ride facilities that are affordable to citizens

A detailed response to this is provided in section 2.10.2.3 of this report.

4.90 90 – Roderic O’Gorman TD

4.90.1 Submission – Various

The submission welcomed the plans to enhance bus priority and improve walking and cycling infrastructure in Dublin 15 and Dublin 7. However, the submission raised the following issues:

1. Provision of additional cycle lanes
2. Castleknock Manor
3. Pedestrian Ramp Boundary Wall
4. Removal and provision of trees
5. Compulsory Purchase Order (CPO) process

4.90.2 Response to submission

Detailed responses to the issues raised in this submission are provided in sections 2.1.3, 2.7.3 , 2.6.3 and 2.2.3 of this report.

4.91 91 – Deirdre O’Halloran

4.91.1 Submission – Navan Road

The submission raised the following issues:

1. Removal and provision of trees
2. Removal of Ashtown Roundabout

4.91.2 Response to submission

Detailed responses to the issues raised by this submission are provided in section 2.2.3 of this report.

4.92 92 – Raymond O’Keeffe

4.92.1 Submission – Phibsborough and adjacent streets

The submission objected to the proposals on Annamoe Terrace, Charleville Road and Monck Place. The submission requested an oral hearing and raised the following issues:

1. Increased traffic flows and associated safety and journey time impacts
2. Air Quality
3. Consultation process

4.92.2 Response to submission

Detailed responses to the issues raised by this submission are provided in section 2.5.3 and section 2.10.2 of this report.

4.93 93 – Paul O’Leary & Brian O’Hanlon

4.93.1 Submission – Various

The submission requested an oral hearing and raised the following issues:

1. Support for the Proposed Scheme
2. Removal of Ashtown Roundabout
3. Removal and provision of trees
4. Alternative measures (park and ride facilities)
5. Old Cabra Road Bus Gate
6. Castleknock Road / Blackhorse Avenue Junction
7. Compulsory Purchase Order (CPO) process
8. Alternative route options
9. Noise and vibration
10. Providing for mobility impaired users
11. Bus stops
12. Consideration of DART+ West
13. Change in travel demand and patterns of travel due to COVID-19 pandemic

4.93.2 Response to submission

Detailed responses to the issues raised in this submission are provided in section 2.2.3, 2.3.3, 2.8.3 and 2.10.2 of this report.

4.94 94 – Katie O’Shea & Other

4.94.1 Submission – Phibsborough and adjacent streets

The submission confirmed support for the Proposed Scheme.

4.94.2 Response to submission

A detailed response to the points raised by this submission is provided in section 2.5.3 of this report.

4.95 95 – Katie Papkovskaia

4.95.1 Submission – Phibsborough and adjacent streets

The submission welcomed the proposed improvements to bus and cycle infrastructure. However, the submission endorsed the submission from Senator Marie Sherlock to An Bord Pleanála and raised the following issues:

1. Lack of public consultation on proposed traffic management measures
2. Increase in traffic flows and associated safety and journey time impacts
3. Air quality

4.95.2 Response

Detailed responses to the issues raised in this submission are provided in section 2.5.3 of this report.

4.96 96 – Cllr. Cieran Perry

4.96.1 Submission – Various

The submission welcomed the proposed improvements to active and sustainable travel, and public realm. The submission requested an oral hearing and raised the following issues:

1. Consultation process
2. Lack of public consultation on proposed traffic management measures
3. Transport modelling
4. Removal of Ashtown Roundabout
5. Increase in traffic flows and associated safety and journey time impacts
6. Old Cabra Road Bus Gates
7. Removal and provision of trees

4.96.2 Response to submission

Detailed responses to the issues raised by this submission are provided in sections 2.10.2, 2.5.3, 2.2.3 and 2.3.3 of this report.

4.97 97 – Phibsboro Village Tidy Towns (PVTT)

4.97.1 Submission – Phibsborough and adjacent streets & Old Cabra Road

The submission welcomed that the Proposed Scheme will have on the quality of life in Phibsborough Village and surrounding area, however the submission requested an oral hearing and raised concerns about the following issues:

1. Use of appropriate baseline modelling
2. Increase in traffic flows and associated safety and journey time impacts
3. Old Cabra Road Bus Gate
4. Consultation process
5. Cabra Road / North Circular Road Junction (@ St Peter's Church)
6. Cumulative impacts
7. Air quality
8. Measures at junction closures

The submission requested mini-parks consisting of soft landscaping, EV charge points and PV panel electric generation at these locations e.g. Monck Place / Phibsborough Road junction.

4.97.2 Response to submission

Detailed responses to the issues raised in points 1 to 7 of this submission are provided in sections 2.10.2, 2.5.3 and 2.3.3 of this report.

8. Measures at junction closures

As noted on the Landscaping General Arrangement drawings of Volume 3 of the EIAR, where space permits, soft landscaping has been introduced where traffic management measures have been introduced in the Phibsborough area e.g. Monck Place and North Circular Road / Cabra Road (Dalymount) junction.

The NTA are not the responsible agency for creation of EV charge points for private vehicles and PV panel electric generation.

4.98 98- Prussia Street Traders

4.98.1 Submission – Stoneybatter and adjacent streets & Phibsborough and adjacent streets

The submission is on behalf of businesses in Park Shopping Centre and some businesses on Prussia Street, noting that the area is effectively a town centre, given the number of retail premises that exist in that locality. The submission attached letters from the following local businesses owners outlining their concerns:

- Park Shopping Centre Ltd. and satellite businesses
- Sam’s Barber and Dublin Market Barbers and Café
- Bodyfirm Ltd
- Lilith Off Licence
- Bridlegrand Ltd
- Grants Uniforms

The submission also included a customer-based survey which for one business claims that a large majority of their customers would not return to their premises after the Proposed Scheme become operational, due to the traffic management changes.

The submission raised the following issues:

1. Impact on Prussia Street, Manor Street and Stoneybatter
2. Increase in traffic flows and associated safety risks and increased journey times
3. Air quality
4. Noise pollution
5. Removal of parking and loading bays on Prussia Street, Manor Street, Stoneybatter area
6. Consultation Process
7. Cabra Road / North Circular Road Junction (@ St Peter’s Church)
8. Cycling Infrastructure
9. Pedestrian Infrastructure
10. Landscaping and Greening Stoneybatter
11. Change in travel demand and patterns of travel due to COVID-19 pandemic
12. Alternative Measures
13. Alternative Options
14. Consultation process
15. Impact on King Street North, George’s Lane, Brunswick Street North and Kirwan Street
16. Need for the Proposed Scheme
17. Bus accessibility
18. Future housing developments
19. Bus journey time and reliability
20. Access Routes

21. Bus services

The submission stated that Cabra Road residents can only access a bus to Prussia Street by taking a bus from Navan Road, which is not feasible for residents who live along the eastern side of Cabra Road.

22. Modal shift

The submission stated there is no solid basis for assuming that there will be a modal shift from private car to public transport and noted there is no provision for the use of a private vehicle with the proposals.

23. Compensation

The submission questioned if compensation would be available for businesses impacted by the Proposed Scheme.

24. Crime / anti-social behaviour

The submission stated it believes that the no-through traffic would lead to an increase in crime and anti-social behaviour along Prussia Street.

25. Other Core Bus Corridor Schemes

The submission stated that the NTA reversed its plans to proceed with bus corridors on Rathgar Road and Mobhi Road.

26. Cost of BusConnects

The submission requested details of how much the Proposed Scheme would cost.

4.98.2 Response to submission

Detailed responses to points 1 to 20 raised in this submission are provided in sections 2.3.3, 2.4.3, 2.5.3 and 2.10.2 of this report.

21. Bus services

Bus stop 1795 on the Cabra Road, immediately east of the junction with Old Cabra Road will serve as an interchange with the inbound bus stop at Chainage A7480 on the Old Cabra Road. Likewise, the outbound bus stop at Chainage A7350 will serve as an interchange with the inbound bus stop (bus stop 1804) located immediately east of Ratoath Road junction on Cabra Road.

In addition, the inbound and outbound bus stops close to Chainage A8270 on Prussia Street will serve as an important interchange with stops on the North Circular Road.

In addition, as part of the BusConnects initiatives, a simpler fare structure includes a 90-minute fare that will allow a customer any combination of travel on Bus, Dart/Commuter Rail and Luas services.

22. Modal shift

Chapter 6 Traffic and Transport in Volume 2 of the EIAR has assessed the impacts that the Proposed Scheme has on modal share by assessing peak hour people movement along the Proposed Scheme.

Section 6.4.6.2.2 of Chapter 6 in Volume 2 of the EIAR outlines the following:

“To determine the impact that the Proposed Scheme has on modal share in the direct study area as a result of its implementation, the weighted average number of people moved by each mode (Car, Bus, Active Modes) has been extracted from the ERM / LAM. The analysis compares the Do Minimum and Do Something scenarios both in the inbound and outbound direction in the AM and PM peak hours (8-9am, 5-6pm) for each forecast year (2028, 2043).

As outlined previously, the same demographic assumptions (population, employment levels) are included in both the Do Minimum and Do Something scenarios. The bus network and frequency assumptions are also the same in both scenarios and are in line with the BusConnects bus network proposals. It is acknowledged, therefore, that the assessment is conservative in terms of the level of people movement that is predicted in the Do Something scenario.

The Do Something scenario will facilitate opportunities to increase bus network capacity operating along the corridor due to the extensive priority provided. In addition to this, the significant segregation and safety improvements to walking and cycling infrastructure that are a key feature of the Proposed Scheme will further maximise the movement of people travelling sustainably along the corridor and will therefore cater for higher levels of future population and employment growth.

In the absence of the delivery of the Proposed Scheme, growth along this key corridor would continue to contribute to increased congestion and operational issues on the road network. The Proposed scheme delivers a reliable alternative to car-based travel that can support future sustainable growth and provide a positive contribution towards reducing carbon emissions.”

Section 6.4.6.2.2.1 2028 AM Peak Hour People Movement of Chapter 6 of the EIAR forecasts “*a reduction of 14% in the number of people travelling via car, an increase of 76% in the number of people travelling via bus and an increase of 53% in people walking or cycling along the Proposed Scheme during the AM Peak Hour.*”

Section 6.4.6.2.2.2 2028 PM Peak Hour People Movement forecasts “*a reduction of 18% in the number of people travelling via car, an increase of 109% in the number of people travelling via bus and an increase in 58% in the number of people walking or cycling along the Proposed Scheme during the PM Peak Hour.*”

23. Compensation

Where lands are not being acquired as part of the CPO, there is no right to compensation. With respect to impact to businesses as a result of the Proposed Scheme, refer also to section 2.4.3.1 of this report.

24. Crime / anti-social behaviour

The NTA document: Permeability in Existing Urban Areas Best Practice Guide 2015, referenced in the Dublin City Development Plan 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.*”

In summary, the study demonstrates that improved pedestrian and cycling links will have a positive impact on residential amenity, rather than leading to an increase in crime and anti-social behaviour.

25. Other Core Bus Corridor Schemes

The Blanchardstown to City Centre Core Bus Corridor Scheme comprises infrastructure improvements for active travel (both walking and cycling), and the provision of enhanced bus priority measures for existing (both public and private) and future service users, in a manner which is consistent with, and will help attain, sustainable transport policies and objectives.

26. Cost of BusConnects

The details of the cost of the Proposed Scheme is not finalised due to ongoing impacts of inflation and scheduling of construction subject to decision of the statutory planning application. Pending planning approval, the progression of the Proposed Scheme to construction stage will be subject to formal business case approvals.

4.99 99 – Rathdown Road & District Residents Association

4.99.1 Submission – Phibsborough and adjacent streets

The submission welcomed the proposed improvement in active travel measures and public transport the Proposed Scheme will bring to the city. However, the submission requested an Oral Hearing and raised the following issues:

1. Lack of public consultation on proposed traffic management measures
2. Cumulative Impacts
3. Increase in traffic flows and associated safety impacts
4. Cabra Road / North Circular Road Junction (@ St Peter's Church)
5. Use of appropriate baseline modelling

4.99.2 Response to submission

Detailed responses to the issues raised by this submission are provided in section 2.5.3 and 2.10.2 of this report.

4.100 100 – Catherine Reilly

4.100.1 Submission – Phibsborough and adjacent streets

The submission confirmed support for the Proposed Scheme.

4.100.2 Response to submission

A detailed response to the points raised by this submission is provided in section 2.5.3 of this report.

4.101 101 – Carl Reynolds

4.101.1 Submission – Navan Road

The submission requested an oral hearing and raised the following issues:

1. Footpath widths
2. Safety at Navan Road / Nephin Road Junction

The submission stated that vehicles have mounted the footpath outside 136 to 142 Navan Road, as a result of turning from Nephin Road onto Navan Road. The submission noted a history of accidents at this junction. The submission went on to state reduction in footpath widths will exacerbate the issue, with a reduction in safety. The submission asked had a risk assessment been carried out.

3. Consultation process
4. Removal and provision of trees
5. Noise and vibration
6. Air quality

4.101.2 Response to submission

Detailed responses to the issues raised by points 1 and 3 to 6 of this submission are provided in sections 2.2.3 and 2.10.2 of this report.

2. Safety at Navan Road / Nephin Road Junction

Section 4.4 of Chapter 4 of Volume 2 of the EIAR states:

The design of the Proposed Scheme was developed with reference to the Preliminary Design Guidance Booklet for BusConnects Core Bus Corridors (PDGB) (NTA 2021) – refer to Appendix A4.1 in Volume 4 of this EIAR. This guidance document 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 project objectives are described in full in Chapter 2 (Need for the Proposed Scheme).

The purpose of the PDGB is to complement existing guidance documents/design standards relating to the design of urban streets, bus facilities, cycle facilities and public realm, which include the following:

- *The Design Manual for Urban Roads and Streets (DMURS) (Government of Ireland 2013);*
- *The National Cycle Manual (NCM) (NTA 2011);*
- *TII National Road Design Standards;*
- *The Traffic Signs Manual (TSM) (DoT 2019);*
- *Guidance on the use of Tactile Paving (UK DfT 2007);*
- *Building for Everyone: A Universal Design Approach (NDA 2020), and*
- *Greater Dublin Strategic Drainage Study (GSDSDS) (Irish Water 2005).”*

Junction corner radii have been designed in line with the principles of DMURS.

As noted in section 4.9 of the Preliminary Design Report:

“Generally, on junctions along the Proposed Scheme, corner radii of between 6m and 10m will be implemented. This will generally accommodate the swept-path of the design vehicles along the route without the swept-path crossing the centre line of the intersecting road. However, where swept-path analysis has identified constrained areas and larger vehicles are anticipated to make up a higher portion of the usage (i.e. bus lanes, HGV service areas etc.) a combination of localised carriageway widening, and increased corner radii has been provided to facilitate this.

Although swept-path analysis is used to inform the junction design, it is not the determining factor. There are a number of additional factors relating to the junction design which are considered in the overall methodology including junction intervisibility, speed of turning vehicles and in particular pedestrian safety. Corner radii along the route will be less than 6m at some locations in order to lower the speed at which vehicles can turn corners and increase inter-visibility between users e.g. Fingall Place (see DMURS section 4.3).

Reduced corner radii will also assist in the creation of more compact junctions, which align crossing points with desire lines and reduce crossing distances. It is accepted that at minor type junctions and residential accesses, larger vehicles may have to cross the centreline; however, usage is expected to be infrequent.”

Refer to Figure 4.101.1 below which shows swept path of a car turning left from Nephin Road. This shows that a vehicle will be following a line to emerge onto the general traffic lane which has a bus lane and cycle track between the general traffic lane and the footpath.

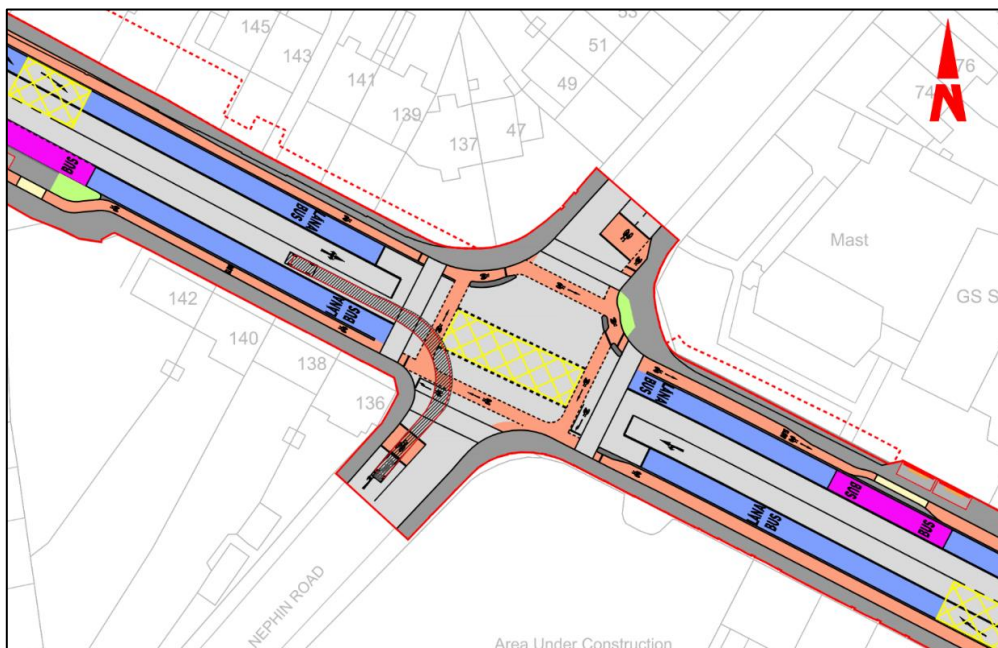


Figure 4.101.1: Swept path of a car turning left from Nephin Road onto Navan Road

4.102 102 – Clare Rudden & Richard Kinsella

4.102.1 Submission – Navan Road & Old Cabra Road

This submission expressed support for improvements to transport infrastructure, however objected to the scheme, requested an oral hearing, and raised concerns with aspects of the Proposed Scheme along the Navan Road and surrounding communities.

The submission requested an oral hearing and raised the following issues:

1. Proximity of bus and cycle lanes
2. Loss of parking and driveway space
3. Impact in property value
4. Loss and provision of tress
5. Noise and vibration
6. Unsafe bus stop arrangement
7. Old Cabra Road Bus Gates (Increased traffic on side roads)

4.102.2 Response to submission

This submission was also made in response to the CPO relating to the proposed acquisition of land from the premises. Detailed responses to the issues raised are provided in section 3.2.26 of this report.

4.103 103 – Brian Ruddy and Aoife Rush

4.103.1 Submission – Navan Road

The submission raised the following issues and requested an oral hearing:

1. Safety
2. Access and Parking
3. Lack of detail on boundary treatment

4. CPO schedule lack of clarity
5. Removal of trees (environmental impact)
6. Signal Control Priority Lane and consideration of alternatives
7. Community
8. Pedestrian Infrastructure and Safety

4.103.2 Response to submission

This submission was also made in response to the CPO relating to the proposed acquisition of land from the property. Detailed responses to the issues raised are provided in section 3.2.27 of this report.

4.104 104 – Claire Ruxton

4.104.1 Submission – Phibsborough and adjacent streets

The submission expressed support for enhanced public transport, however objected to the proposals on Monck Place and raised the following issues:

1. Increase in traffic flows and associated safety impacts and journey time impacts
2. Air quality

4.104.2 Response to submission

Detailed responses to the issues raised by this submission are provided in section 2.5.3 of this report.

4.105 105 – Enda Ruxton

4.105.1 Submission – Phibsborough and adjacent streets

The submission objected to the proposals on Monck Place and raised the following issues:

1. Increase in traffic flows and associated safety impacts and journey time impacts
2. Air quality

4.105.2 Response to submission

Detailed responses to the issues raised by this submission are provided in section 2.5.3 of this report.

4.106 106 – Shandon Residents Association

4.106.1 Submission – Phibsborough and adjacent streets

The submission endorsed the submissions from Senator Marie Sherlock and Leinster Street North and raised the following issues:

1. Air quality
2. Increase in traffic flows and associated safety and journey time impacts
3. Parking

The submission stated that any reduction in parking on North Circular Road and Cabra Road will push parking into the Shandon area.

4. Cumulative impacts
5. Alternative measures

4.106.2 Response to submission

Detailed responses to points 1, 2, 4 and 5 raised by this submission are provided in section 2.5.3 and section 2.10.2 of this report.

3. Parking

There is no reduction in parking on North Circular Road or Cabra Road as a result of the Proposed Scheme.

4.107 107 – Senator Marie Sherlock

4.107.1 Submission – Phibsborough and adjacent streets

The submission welcomed proposals on Navan Road and Stoneybatter, including the introduction of segregated cycle lanes, along with widening of footpaths and improvements to public realm at Stoneybatter. However, the submission requested an oral hearing and objected to the traffic management measures to be implemented outside of the Core Bus Corridor route, due to the impact on surrounding communities.

The submission requested an oral hearing and raised the following issues:

1. Lack of public consultation on proposed traffic management measures
2. Increase in traffic flows and associated safety and journey time impacts
3. Use of appropriate baseline modelling
4. Flawed classification system

4.107.2 Response to submission

Detailed responses to the issues raised by this submission are provided in section 2.5.3 of this report.

4.108 108 – Jackie & Bernard Smyth

4.108.1 Submission – Navan Road

The submission raised the following issues:

1. Driveway access and parking
2. Safety
3. Air quality
4. Noise and vibration
5. Impact on property value

4.108.2 Response to submission

This submission was also made in response to the CPO relating to the proposed acquisition of land from the premises. Detailed responses to the issues raised are provided in section 3.2.30 of this report.

4.109 109 – Stoneybatter Pride of Place

4.109.1 Submission – Stoneybatter and adjacent streets

The submission welcomed more efficient public transport, safe cycle routes and enhanced pedestrian facilities. It raised the following issues:

However, the submission raised the following issues:

1. Change in travel demand and patterns of travel due to COVID-19 pandemic
2. Consultation process

3. Impact on Prussia Street, Manor Street and Stoneybatter
4. Impact on Aughrim Street
5. Impact on St Joseph's Road, Oxmantown Road, Manor Place, Cowper Street, Aughrim Place, Arbour Hill, Montpellier Hill, Ard Righ Road and Infirmary Road
6. Impact on King Street North, George's Lane, Brunswick Street North and Kirwan Street
7. Air quality
8. Road safety
9. Removal of parking and loading bays from Prussia Street, Manor Street, Stoneybatter and St Joseph's road
10. Landscaping and Greening Stoneybatter
11. Cycling infrastructure
12. Pedestrian infrastructure
13. Additional measures

4.109.2 Response to submission

Detailed responses to the issues raised by this submission are provided in sections 2.4.3 and 2.10.2 of this report.

4.110 110 – Patricia Swan

4.110.1 Submission – Phibsborough and adjacent streets

The submission welcomed proposals on Navan Road and Stoneybatter, including the introduction of segregated cycle lanes, along with widening of footpaths and improvements to public realm at Stoneybatter. However, the submission objected to the traffic management measures to be implemented outside of the Core Bus Corridor route, due to the impact on Connaught Street and surrounding communities.

The submission requested an oral hearing and raised the following issues:

1. Planning documentation
2. Lack of public consultation on proposed traffic management measures
3. Increase in traffic flows and associated safety and journey time impacts
4. Use of appropriate baseline modelling
5. Flawed classification system
6. Inadequate referencing and lack of consistency in documentation
7. Discrepancies in drawings
 - Charleville Road
 - Annamoe Terrace and Road
8. Cabra Road / North Circular Road junction (@ St Peter's Church)
9. Cumulative impacts
10. Data Collection
 - Traffic and Transportation
 - Air Quality

- Noise and Vibration
- Road Safety Audits

4.110.2 Response to submission

Detailed responses to the issues raised by this submission are provided in sections 2.10.2 and 2.5.3 of this report

4.111 111 – Mairead Thorpe

4.111.1 Submission – Navan Road

The submission stated that the Navan Road Community Council (NRCC) supports the Proposed Scheme, but noted it had concerns, particularly with the section between the Parkway railway station and Old Cabra Road junction. The submission requested an oral hearing.

The submission noted that NRCC wishes to contribute to developing the Proposed Scheme for the benefit of the local community and for the public who access the city via the Navan Road, and do not want negative consequences from the Proposed Scheme.

4.111.2 Response to submission

Detailed responses to the points raised by the NRCC and others are covered in section 2.2.3, 2.3.3, 2.8.3 and 2.10.2 of this report.

4.112 112 – TII

4.112.1 Submission – Whole Scheme

The submission expressed support for the Proposed Scheme and raised the following issues:

1. Support for the Proposed Scheme
2. Proposed diverge lane between Mill Road Bridge and Access Road to James Connolly Hospital
3. Potential use of bus lanes on N3 by cyclists

4.112.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in section 2.9.8 of this report.

4.113 113 – Colette Timmons

4.113.1 Submission – Navan Road & Old Cabra Road

The submission requested an oral hearing and raised the following issues:

1. Consultation process
2. Removal and provision of trees
3. Alternative Route Options
4. Removal of Ashtown roundabout
5. Accommodation works
6. Noise and Vibration
7. Old Cabra Road Bus Gates
8. Alternative measured (park & ride facilities)
9. Cycle stands

10. Bus stops
11. Utility works
12. Consideration of Dart+ West
13. Road safety

4.113.2 Response to submission

Detailed responses to the issues raised by this submission are provided in section 2.2.3, 2.3.3 and 2.10.2 of this report.

4.114 114 – Catherine Tobin

4.114.1 Submission – Navan Road and Old Cabra Road

The submission raised the following issues:

1. Consultation process
2. Permanent CPO
3. Removal and provision of trees
4. Removal of Ashtown Roundabout
5. Removal of median and vehicle restraint system (VRS) on R147 Navan Road.
6. Private car use
7. Old Cabra Road Bus Gates (increased traffic congestion)

4.114.2 Response to submission

This submission was also made in response to the CPO relating to the proposed acquisition of land from the premises. Detailed responses to the issues raised are provided in section 3.2.29 of this report.

4.115 115 – Brendan Twomey

4.115.1 Submission – Castleknock Road / Blackhorse Avenue junction & Navan Road

The submission stated that it is prepared on behalf of Chesterfield Residents Association. The submission is supportive of improved public transport but not to the detriment of local communities.

The submission raised the following issues:

1. Castleknock Road / Blackhorse Avenue Junction
2. Removal and provision of trees

4.115.2 Response to submission

Detailed responses to the issues raised by this submission are provided in section 2.8.3 and 2.2.3 of this report.

4.116 116 – Des Twomey

4.116.1 Submission – Phibsborough and adjacent streets

The submission confirmed support for the Proposed Scheme.

4.116.2 Response to submission

A detailed response to the points raised by this submission is provided in section 2.5.3 of this report.

4.117 117– Giuseppe Vani

4.117.1 Submission – Stoneybatter and adjacent streets

The submission objected to the Proposed Scheme and raised the following issue:

1. Removal of parking and loading bays from Prussia Street, Manor Street, Stoneybatter and St Joseph’s road

4.117.2 Response to submission

A detailed response to the issue raised in this submission have been provided in section 2.4.3 of this report.

4.118 118 – Frank Walsh & Anthony Malone

4.118.1 Submission – Stoneybatter & adjacent streets

The submission objected to the proposed ‘public right of way to be restricted or otherwise interfered’ with at Brunswick Street North.

The submission included a petition of Brunswick Street North resident signatures. The submission supported the BusConnects objectives, however raised the following issues:

1. Impact on King Street North, George’s Lane, Brunswick Street North and Kirwan Street
2. HGV swept-path

The submission stated that a HGV would not be able to turn safely from George’s Lane onto Brunswick Street North and that 3.5t HGVs should remain banned from Brunswick Street North due to safety concerns.

3. Air Quality
4. Noise pollution

The submission stated that due to an increase in traffic, there will be an increase in noise and air pollution on Brunswick Street North.

4.118.2 Response to submission

Detailed responses to points 1 and 3 raised in this submission are provided in section 2.4.3 of this report.

2. HGV swept-path

It should be noted that 5-axle HGVs are restricted from entering areas of Dublin City as per the Dublin City Council HGV Management Strategy. The restrictions are in place between 7am and 7pm six days a week, however a permit can be acquired to enter during these hours for particular reasons.

It is also forecast that the rigid HGV vehicles will make up a very low percentage of vehicles that will pass along Brunswick Street North as a result of the Proposed Scheme.

Refer to Figure 4.118.1 which shows the safe manoeuvre of a rigid HGV accessing Brunswick Street North from George’s Lane.



Figure 4.118.1: Swept-path of Rigid HGV turning from George's Lane into Brunswick Street North

4. Noise Pollution

Section 9.4.4 of Chapter 9 'Noise and Vibration' of Volume 2 of the EIAR assesses the potential impacts of the Operational Phase on noise and vibration levels of the Proposed Scheme.

As noted in section 9.4.4.1.1 of Chapter 9:

“the output of the traffic modelling has been used to undertake a detailed analysis of traffic noise levels changes.”

For the Opening Year 2028 and Design Year 2043, an impact of “Imperceptible/Positive” is forecast on Brunswick Street North as a result of the Proposed Scheme.

4.119 119 – Councillor John Walsh

4.119.1 Submission – Various

The submission welcomed the Proposed Scheme in principle, however raised the following issues:

1. Pedestrian Ramp Boundary Wall
2. Environmental impact of works adjacent to Tolka River @ Mill Road

The submission is concerned about the potential impact on the ecosystem and trees due to the proposed pedestrian ramp and lighting on the north side of the N3. The submission called for replacement with fully mature trees.

3. Castleknock Manor
4. Removal of Ashtown roundabout
5. Castleknock Road / Blackhorse Avenue junction
6. Removal and provision of trees

4.119.2 Response to submission

Detailed responses to the issues raised in points 1 and 3 to 6 of this submission are provided in section 2.6.3, 2.7.3, 2.2.3 and 2.8.3 of this report.

2. Environmental impact of works adjacent to Tolka River @ Mill Road

Section 17.4.4.1.2 of Chapter 17 Landscape and Visual of Volume 2 of the EIAR states the following:

The Operational Phase of the Proposed Scheme involves changes primarily to Mill Road / N3 overbridge area with provision of ramp and step access to Mill Road via Tolka Valley Park and open space adjacent to Millstead and localised changes to sections of road boundary. Trees will be lost during the Construction Phase, and the effect of this permanent loss will also be experienced during the Operational Phase. However, some replacement / compensatory planting will be provided which will reduce effects over the long-term. The Proposed Scheme will not alter the overall townscape / streetscape character along this section of the Proposed Scheme. The baseline townscape is of low sensitivity. The magnitude of change in the baseline environment is medium.

The potential townscape / streetscape effect of the Operational Phase is assessed to be Negative, Slight and Short-term, becoming Neutral, Slight, Long-Term.

Section 17.4.4.2.9 of Chapter 17 Landscape and Visual of Volume 2 of the EIAR states the following:

A number of trees will have been removed during the Construction Phase but the Operational Phase of the Proposed Scheme will not impact directly on any additional trees. However, the effect of loss of these trees from the townscape / streetscape will continue to be experienced in the Operational Phase until the point that replacement planting, if provided at similar locations and quantities, is established to a similar degree of maturity as the removed trees. There will be substantial replacement or compensatory planting where practicable, however some areas of the townscape / streetscape will be left with reduced numbers of trees, most notably at Mill Road and along Navan Road. Sensitivity is high. The magnitude of change is medium / high.

The potential townscape and visual effect of the Operational Phase on trees and plantings is assessed to be Negative, Moderate / Significant and Short-Term becoming Negative, Moderate, Long-term.

Section 12.4.4.4.1.1 Indirect Disturbance of Light Patterns Due to Operational Lighting of Chapter 12 Biodiversity of Volume 2 of the EIAR states:

As part of the iterative design process, the loss of boundary vegetation or extensive areas of woodland / linear vegetation loss has been minimised as far as is practical. The localised removal of vegetation to enable construction, particularly along Section 2 of the Proposed Scheme could result in additional light spill into areas where bats potentially forage. The design has minimised as far as is possible tree loss, particularly alongside the Tolka River Valley alongside the existing N3. The removal of discrete areas of vegetation is not predicted to impact bats in the wider areas, given the sylvan nature of this area. Over time in the period estimated as up to 10-15 years, the establishment and maturation of landscape planting would be expected to negate much of the tree loss and hence any additional light spill.

There are a total of two proximal areas where new low-level lighting is proposed in previously dark / low lighting areas i.e. BR02 Mill Road Bridge and RW07A&B Pedestrian Ramps. There may be disruption to potential commuting foraging routes across existing woodland habitats adjacent to the Tolka_040. However, considering that the N3 is already artificially lit, bats are more likely to be foraging at a greater distance from the road as woodland habitat (free from lighting) is plentiful to the north-east of the Proposed Scheme at this location. Furthermore, it is expected that bats utilizing this edge habitat would be habituated to some degree of artificial lighting.

Therefore, the overall effect of artificial lighting on bats during operation is considered to be significant at the local level only. Mitigation measures to avoid light spill are included in the design and detailed in Section 12.5.

Section 12.4.4.4.1.1 Disturbance / Displacement – Increased Human Activity of Chapter 12 states:

“For the most part, the Operational Phase of the Proposed Scheme will not contribute to significant changes in increased human activity by virtue of it being along the bulk of the existing transport corridor and populations of bats associated with the Proposed Scheme are likely to be habituated to a certain degree of human disturbance. However, vegetation clearance on Section 2 of the Proposed Scheme along the N3 and Mill Road is required during Construction Phase. This linear boundary territory along the existing N3 will not be nor re-established through future planting. Considerable bat activity has been recorded in the wooded area alongside the River Tolka adjacent to the Proposed Works (see Section 12.3.8.1). Connectivity for bats within retained wooded area along the River Tolka at this point will ensure no likely significant change in distribution or movement. Thus, in general, no likely significant

effect as a consequence of increased human activity to bats are predicted for the majority of the Proposed Scheme. However, in respect of the area around Mill Road, it is considered that there may be temporary significant effect on bats at a local scale, until such a time that they have habituated to the increased levels of human disturbance.”

As noted in section 4.6.11.5.2 New Woodland Areas and Tree Groups of Chapter 4 Proposed Scheme Description of Volume 2 of the EIAR:

“The Proposed Scheme includes a range of existing mature and immature woodlands areas. Some of these will be impacted where the existing carriageway will be widened or cycling infrastructure will be provided. It is proposed to reinstate construction working areas and also to replant the edges of impacted woodland areas, so as to reinstate the streetscape or roadway character. Additionally, there are areas of land within the corridor that are presently in grass or scrub, and new woodlands areas will be established in these locations to offset the loss of woodlands elsewhere and to provide more consistent presentation along carriageway edges.

*Woodland tree planting will typically comprise bare-root native tree species including *Alnus glutinosa* (Black Alder), *Salix aurita*, *Salix cinerea oleifolia*, *Salix caprea*, *Salix petrandra* (Willow sp.), *Betula pendula* (Silver Birch), *Pinus sylvestris* (Scots Pine), *Crataegus monogyna* (Hawthorn), *Quercus petraea* (Sessile Oak), *Prunus spinosa* (Blackthorn) and *Viburnum opulus* (Guelder Rose).”*

4.120 120 – James Ward

4.120.1 Submission – Phibsborough and adjacent streets & Stoneybatter and adjacent streets

The submission welcomed proposals on Navan Road and Stoneybatter, including the introduction of segregated cycle lanes, along with widening of footpaths and improvements to public realm at Stoneybatter. However, the submission objected to the traffic management measures to be implemented outside of the Core Bus Corridor route, due to the impact on Connaught Street and surrounding communities.

The submission requested an oral hearing and raised the following issues:

1. Planning documentation
2. Lack of public consultation on proposed traffic management measures
3. Increase in traffic flows and associated safety and journey time impacts
4. Use of appropriate baseline modelling
5. Flawed classification system
6. Inadequate referencing and lack of consistency in documentation
7. Discrepancies in drawings
 - Charleville Road
 - Annamoe Terrace and Road
8. Cabra Road / North Circular Road junction (@ St Peter’s Church)
9. Cumulative impacts
10. Data Collection
 - Traffic and Transportation
 - Air Quality
 - Noise and Vibration
 - Road Safety Audits

11. Impact on St Joseph's Road, Oxmantown Road, Manor Place, Cowper Street, Aughrim Place, Arbour Hill, Montpellier Hill, Ard Righ Road and Infirmary Road (Access to Aughrim Place)

4.120.2 Response to submission

Detailed responses to the issues raised by this submission are provided in sections 2.10.2, 2.5.3 and 2.4.3 of this report.

4.121 121 – Gerry Weir

4.121.1 Submission – Phibsborough and adjacent streets

This submission objected to the proposed traffic management change at Charleville Road and raised the following issues:

1. Increased traffic flows and associated safety and journey time impacts
2. Air quality
3. Noise pollution
4. Alternative traffic management proposal

The submission proposed preventing access onto Charleville Road at its junction with Cabra Road, which it stated would achieve the same aim as the Proposed Scheme and permit residents to access North Circular Road from Charleville Road.

4.121.2 Response to submission

Detailed responses to points 1 to 3 of this submission are provided in section 2.5.3 of this report.

4. Alternative traffic management proposal

An alternative traffic management arrangement has been proposed for Charleville Road i.e. to operate a northbound one-way section at the northern end (at the Cabra Road junction) instead of at the southern end (at the junction with North Circular Road). The alternative arrangement would have the same effect as the Scheme proposal in respect of stopping through-traffic from diverting through local streets.

The Proposed Scheme has key characteristics which are considered to offer advantages over this proposed alternative as follows:

- The proposed one-way section is alongside an existing Dublin Bikes parking station, which will allow greater space for bike manoeuvring in and out of the bike station and also provide an ability to operate a 'long' one-way section from the junction with North Circular Road – which is considered to be reasonably self-enforcing. A one-way section at the northern end would be expected to operate as a short 'No Entry' from Cabra Road, which would potentially be more prone to transgression by drivers turning from Cabra Road.
- The proposed arrangement provides access 'in' to Charleville Road from both directions, which offers convenience to residents, whereas the alternative would require all residents to enter from the North Circular Road. For residents leaving Charleville Road, the scheme proposal will involve driving out via the Cabra Road junction.
- The proposed arrangement provides space for a 3-point turn (at the back-lane junction just north of the one-way section) for residents' vehicles which park facing south but wish to leave to the north. The alternative arrangement would typically require any vehicles which enter from the south and park facing north (and wishing to leave to the south) to perform 3-point turns within the main residential section of the road, where the presence of on-street parking will make this more difficult.

4.122 122 – Tesco Ireland Limited

4.122.1 Submission – Stoneybatter and adjacent streets

The submission is received from Avison Young, in conjunction with Pinnacle Consulting Engineers, on behalf of Tesco Ireland Limited.

This submission welcomed the NTA’s investment in sustainable transport to improve the urban environment of Dublin City and its suburbs. It raised the following issues:

1. Impact on Prussia Street, Manor Street and Stoneybatter

4.122.2 Response to submission

This submission was also made in response to the CPO relating to the proposed acquisition of land from the premises. Detailed responses to the issues raised have been provided in section 3.2.28 of this report.

4.123 123 – Thomas Curtin and Karina O’Leary

4.123.1 Submission – Navan Road

The submission raised the following issues:

1. Removal of Ashtown Roundabout
2. Traffic Impact
3. Road safety
4. Alternative measures (park and ride facilities)
5. Traffic signals for cyclists
6. Removal and provision of trees
7. Noise and vibration
8. Air quality
9. Right turn lane removed at Ashtown Grove

4.123.2 Response to submission

This submission was also made in response to the CPO relating to the proposed acquisition of land from the premises. Detailed responses to the issues raised are provided in section 3.2.3 of this report.

4.124 124 – Inland Fisheries Ireland

4.124.1 Submission – Whole Scheme

The submission outlined observations and recommendations related to fisheries which the Proposed Scheme will interact with.

4.124.2 Response to submission

Detailed responses to the issues raised in this submission are provided in section 2.9.9 of this report.

4.125 125 – Brendan Heneghan

4.125.1 Submission – Whole Scheme

The submission raised the following issues:

1. Administrative error

2. The Aarhus Convention
3. Traffic modelling
4. Traffic management proposals in Phibsborough
5. Removal of Ashtown roundabout
6. Bus journey time savings
7. Bus stop locations

4.125.2 Response to submission

Detailed responses to the issues raised in this submission are provided in section 2.9.10 of this report.