Ballymun / Finglas to City Centre Core Bus Corridor Scheme

NTA Observations on the Proposed Scheme Submissions

February 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 made to An Bord Pleanála ("the Board") for the following:

- *the application under Section 51 of the Roads Act 1993, as amended, for approval of the Ballymun/Finglas to City Centre Core Bus Corridor Scheme ("the Proposed Scheme"); and*

A separate report provides responses to the objections in relation to the Ballymun/Finglas to City Centre Core Bus Corridor Scheme Compulsory Purchase Order 2022 ("the CPO").

An overview of the submissions 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.

There is:

(i) a significant degree of overlap between many of the issues raised in submissions on the Proposed Scheme; and

(ii) some overlap between the issues raised in certain submissions on the Proposed Scheme and objections to the CPO, which are highlighted in the relevant section.

Only the issues relevant to the Proposed Scheme are addressed in this report, and issues relevant to the CPO are responded to in a separate report.

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 Received

A total of 68 submissions were received by the Board.

The submissions in response to the Proposed Scheme are broken down into groups either associated with a particular location along the Corridor or of a more general nature below. Table 1.1 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 1.1: Summary of Submissions in Response to the Proposed Scheme by Section

Section	Location	No. of submissions	Key Issues Raised
1	Ballymun	9	Northwood Avenue junction Construction Impact at Our Lady of Victories Schools Bus stop No.37 at Albert College Lawns Loss of parking on Ballymun Road at Albert College Park Bus stop No.39 on St. Mobhi Road Griffith Avenue gyratory Right turn from St. Canice's Road
2	Glasnevin	48	Impact of traffic diverted by Bus Gate at St. Mobhi Road Closure to northbound traffic on Old Ballymun Road St. Mobhi Road footpaths Impacts of construction phase Connection to City Centre Various locally specific issues

Section	Location	No. of submissions	Key Issues Raised
3	Phibsborough	11	Lack of cycle facilities along Phibsborough Road. Biodiversity at the Royal Canal
4	Western Way to Arran Quay	1	Traffic impact at Church Street due to recent pedestrianisation of Capel Street. Cycle route.
5/6/7	Finglas Road	4	New pedestrian links at North Road / Mellowes Park Access at junction New opening in boundary wall for access
All	Whole scheme	7	Consultation process Bus Journey Time Savings Connection to the City Centre Design issues for cycling facilities, bus stops and pedestrians.

2. Response to Submissions on Proposed Scheme

2.1 Section 1: Ballymun Road from St. Margaret's Road to Griffith Avenue

2.1.1 Description of Proposed Scheme at this Location

As set out in Section 4.5.1 of Chapter 4 in Volume 2 of the EIAR, , this section of the Proposed Scheme will commence on R108 Ballymun Road at its junction with St. Margaret's Road, just south of M50 Motorway Junction 4. This section of the Proposed Scheme will extend along R108 Ballymun Road to the junction with R102 Griffith Avenue.

Priority for buses will be provided along the entire length of this section of the Proposed Scheme, with dedicated bus lanes in both directions. Segregated cycle tracks will be provided in both directions.

In this section there are 12 existing signal-controlled junctions, of which 11 are on the Ballymun Road dual carriageway, which are large in scale with long crossing distances for pedestrians. The Proposed Scheme will reduce the footprint of these junctions through narrower traffic lanes and tighter corners and through the removal of most left-turn slip lanes. This will provide more direct pedestrian crossings on all junction arms, where in some cases there may only be signal crossings on some but not all arms. Protected cycle tracks are proposed at each junction to maintain segregation from traffic to the greatest degree possible.

In Ballymun Town Centre, on Ballymun Main Street, the street layout will be altered from two general traffic lanes to one general traffic lane and one dedicated bus lane in each direction between the Shangan Road Junction and the Gateway Crescent Junction to provide permanent on-street parking at the commercial and civic premises along Ballymun Main Street. New street trees will be provided to improve the urban realm along Ballymun Main Street.

South of the R103 Collins Avenue Junction, the road layout in the northbound direction will be altered from two general traffic lanes to one general traffic lane and one dedicated bus lane on the western side of the carriageway north of the junction at St. Pappin Road to accommodate on-street parking spaces, which will serve frequent drop- off activity related to the Our Lady of Victories National School.

At the gyratory junction of R108 Ballymun Road / R102 Griffith Avenue / R108 St. Mobhi Road, the traffic system will be modified to divert southbound left-turn traffic on R108 St. Mobhi Road turning east onto R102 Griffith Avenue. This traffic will instead circulate around the western and southern arms of the triangular road system which will be modified to two-way movement on those arms. Likewise, eastbound traffic from the western section of R102 Griffith Avenue will continue directly along the southern side of the gyratory instead of diverting around the northern end of it. This arrangement will remove a significant traffic conflict at the corner of R108 St. Mobhi Road and R102 Griffith Avenue which will benefit buses and cyclists.

Segregated cycle tracks will be provided through the traffic gyratory, plus a two-way cycle track along R102 Griffith Avenue on the southern side to facilitate the cycle connection from Griffith Avenue West (where there is a primary school and sports ground) to R108 St. Mobhi Road, without the need for eastbound cyclists to cross the road twice.

Extracts from the General Arrangement Drawings, which are provided in Volume 3 of the EIAR, are included below in Figure 2-1-1 to Figure 2-1-8.

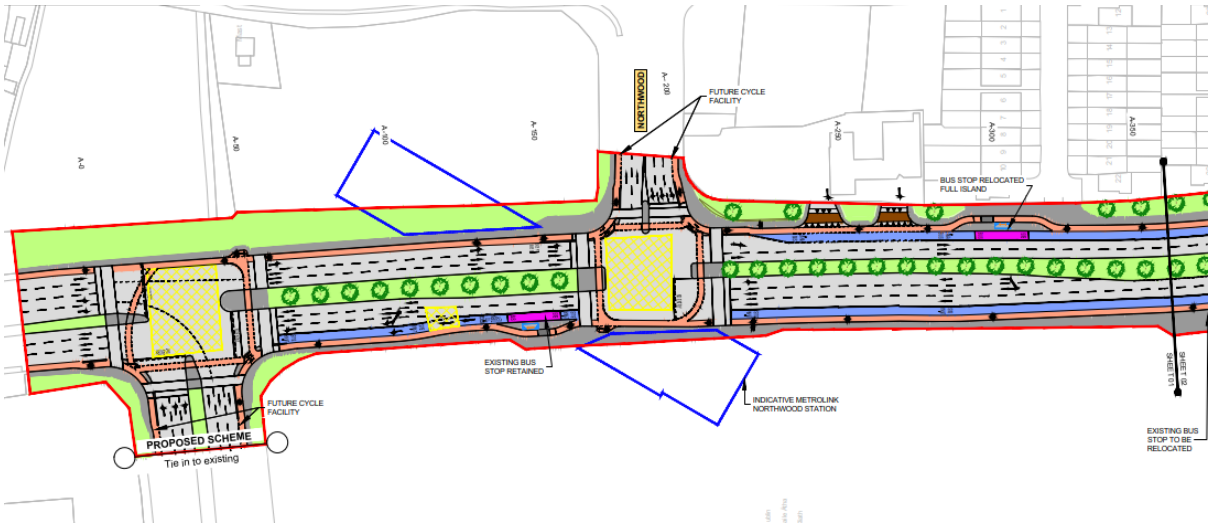


Figure 2-1-1: Extract from General Arrangement Drawing

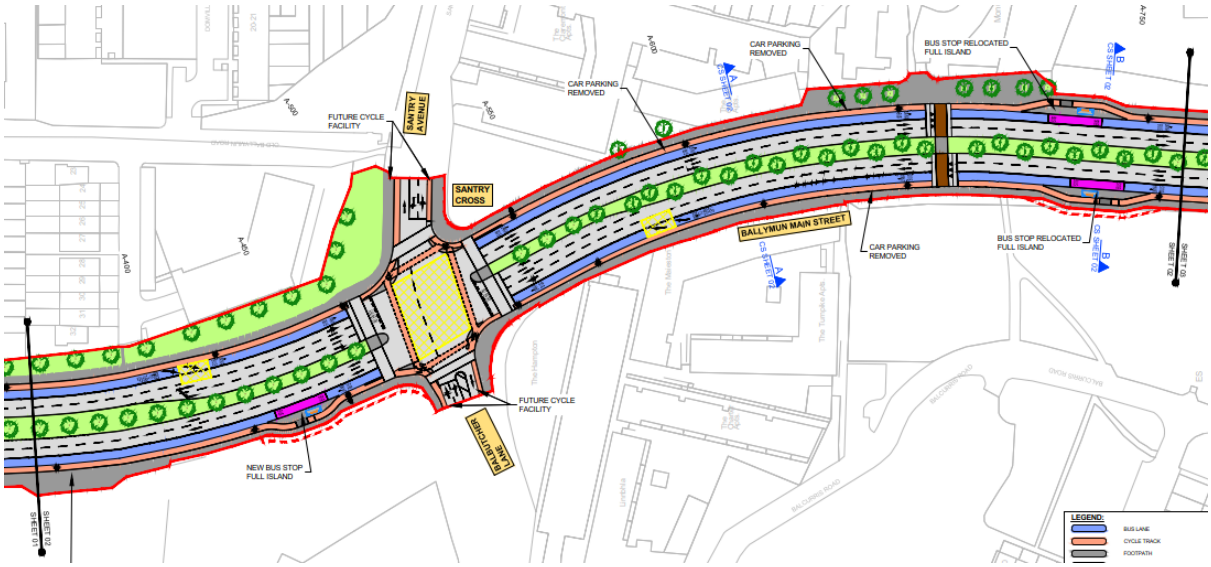


Figure 2-1-2: Extract 2 from General Arrangement Drawing

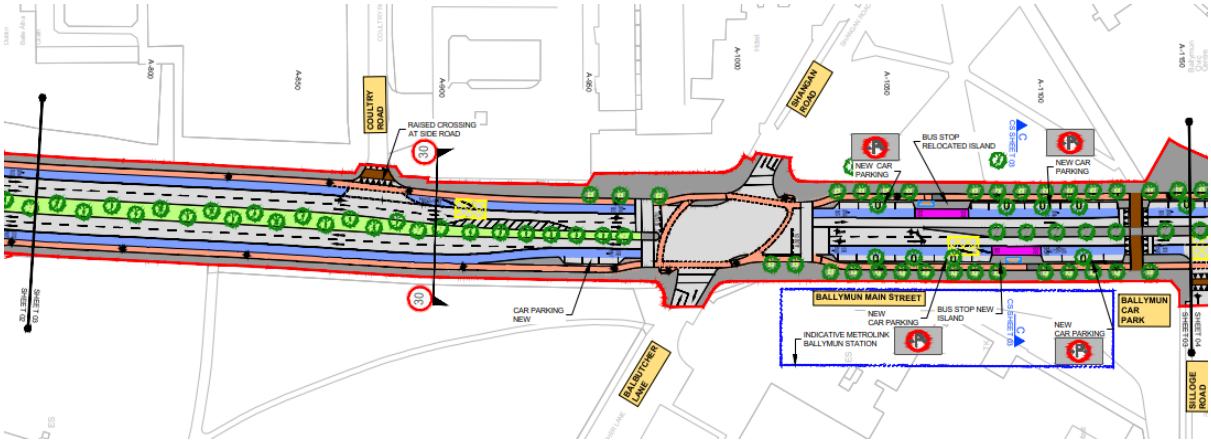


Figure 2-1-3: Extract 2 from General Arrangement Drawing

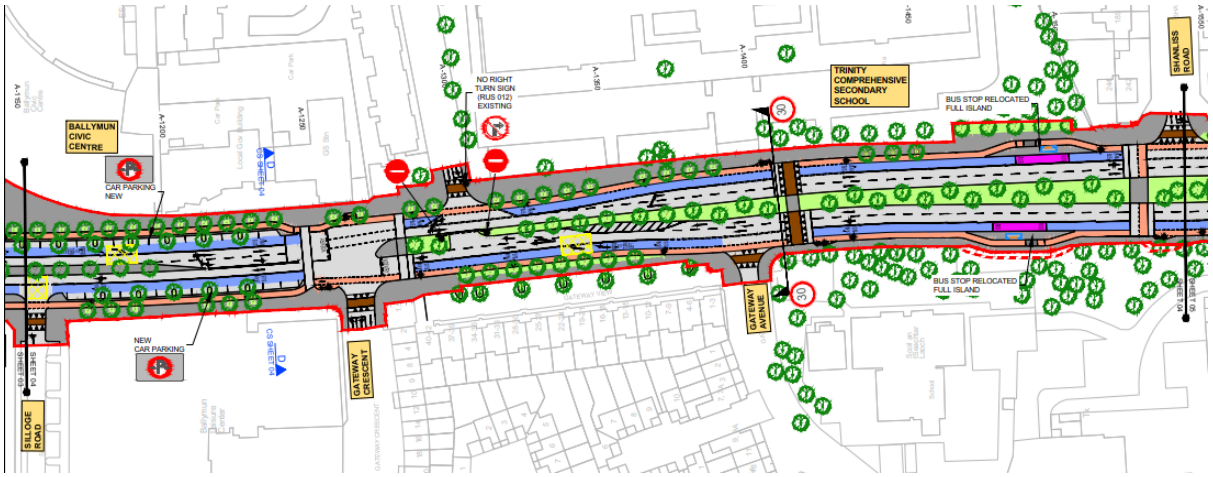


Figure 2-1-4: Extract 2 from General Arrangement Drawing

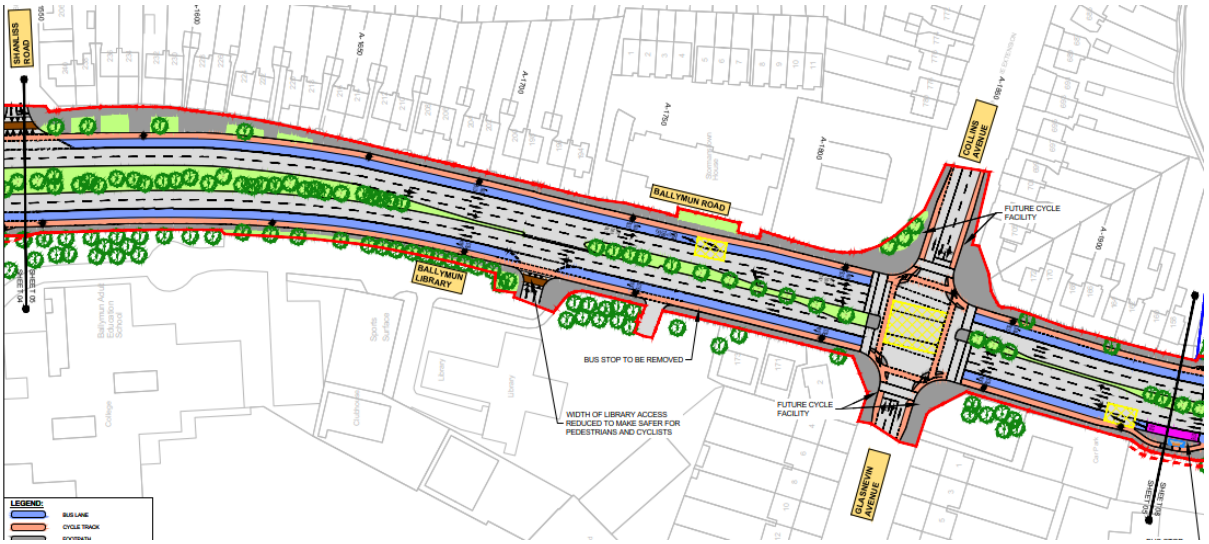


Figure 2-1-5: Extract 2 from General Arrangement Drawing

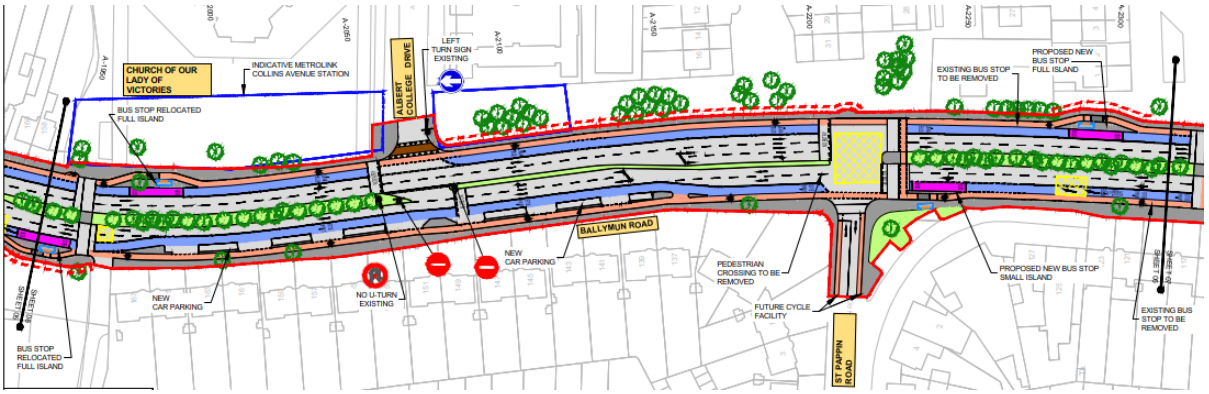


Figure 2-1-6: Extract 2 from General Arrangement Drawing

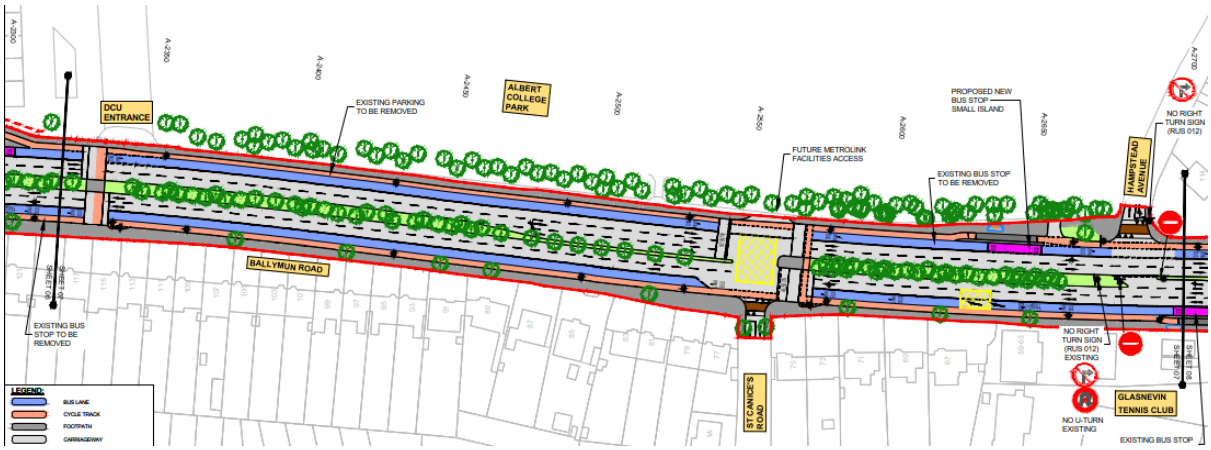


Figure 2-1-7: Extract 2 from General Arrangement Drawing

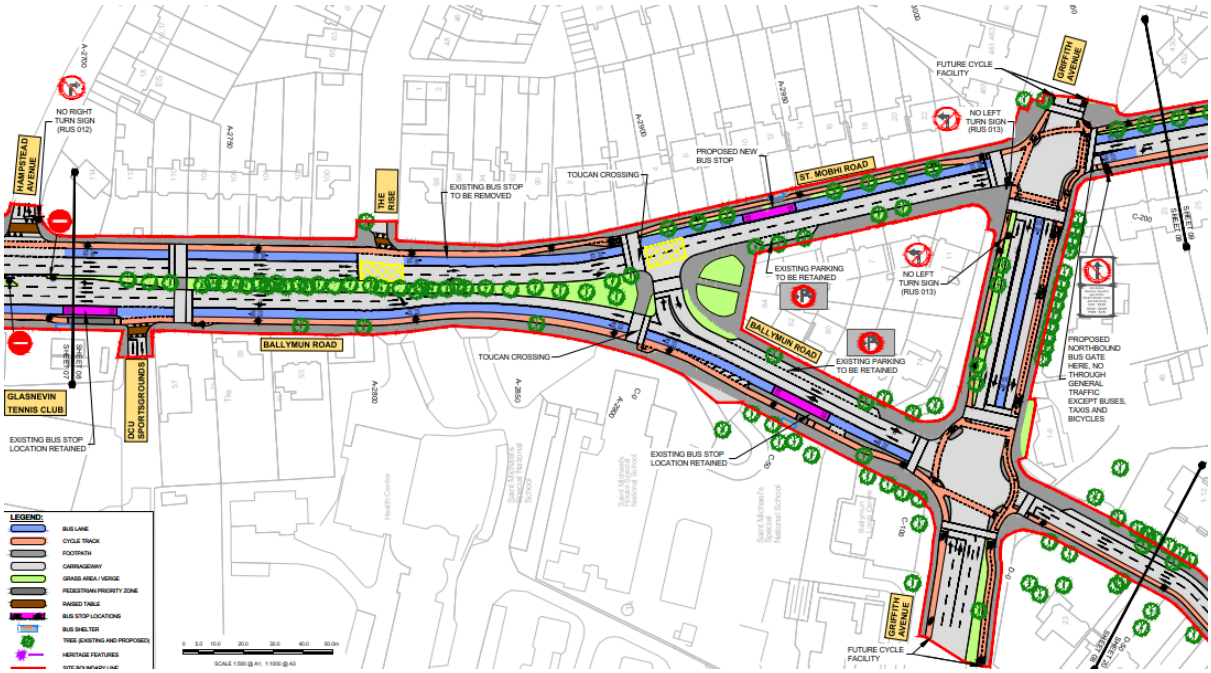


Figure 2-1-8: Extract 2 from General Arrangement Drawing

2.1.2 Overview of Submissions Received

Table 2.1 below lists the individual submissions made in respect of the Proposed Scheme in Section 1 on Ballymun Road from St. Margaret's Road to Griffith Avenue.

Table 2.1: Submissions Made in Respect of Section 1: Ballymun Road from St. Margaret's Road to Griffith Avenue

No	Name	No	Name	No	Name
12	Carola Reynolds	41	Lesley Hewson, Lorraine Rooney and Alfreda Kavanagh	53	Pat Rooney
18	Declan & Audrey Dempsey	44	Kieran Smyth and others	65	Tesco
40	Kevina McGill	52	Our Lady of Victories Schools	67	Albert College Lawn Residents

2.1.3 Issues Raised for Section 1

2.1.3.1 Northwood Avenue Junction

Summary of issue raised

RMLA Ltd. planning consultants for Tesco Ltd. raised a concern about the modification of the Northwood Avenue Junction which provides access for heavy goods vehicles (HGVs) to and from the Tesco Distribution Centre.

Response to issue raised

In the Proposed Scheme the left-turn slip lanes will be removed at this junction to improve conditions for pedestrians and cyclists. This will not affect HGVs as the roads at the junction are wide with multiple lanes and generous widths for large vehicles to turn as is demonstrated in an Auto-Track swept path analysis sown in Figure 2-1-9.

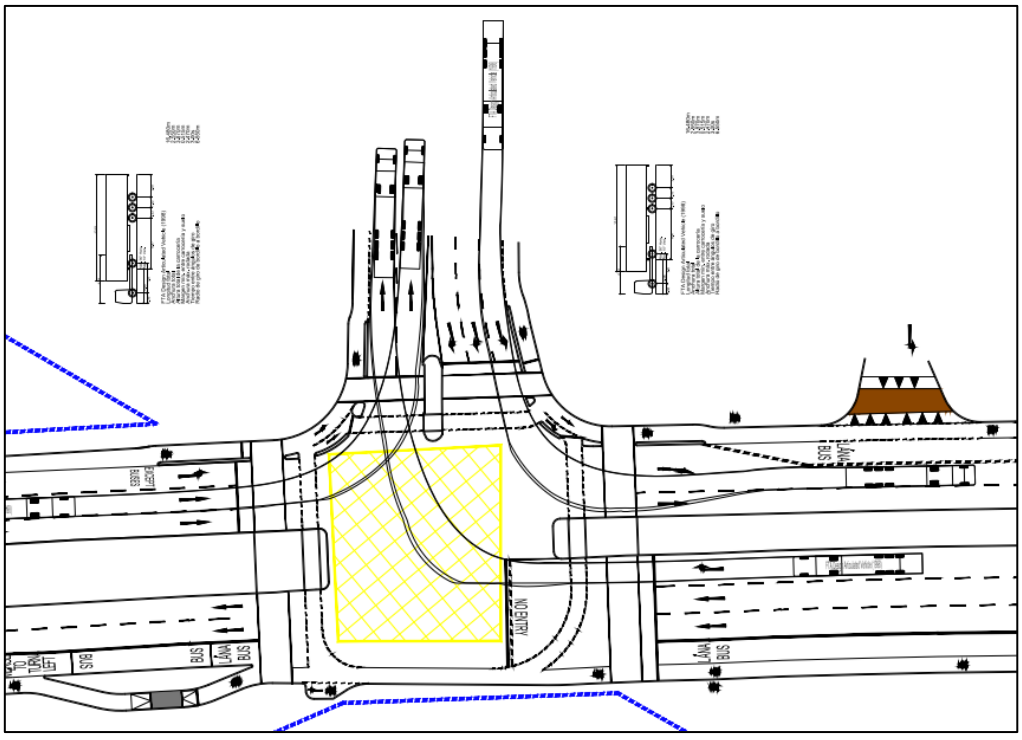


Figure 2-1-9: HGV Swept-path Analysis at Northwood Avenue/ Ballymun Road Junction

2.1.3.2 Construction Impact at Our Lady of Victories Schools

Summary of issue raised

The submission from Our Lady of Victories Schools raises concerns about the encroachment of the Proposed Scheme into the green area in front of the school, various operational difficulties that happen during the busy morning and afternoon periods when large numbers of pupils come and go from the school, and about access to the school during the construction works. Aspects of the submission relate to the CPO and are responded to in the separate report for the CPO Objections.

Responses to issues raised

The particular circumstances at these three schools were taken into consideration in the design of the Proposed Scheme as follows:

a) Problems of irregular parking near the school will be improved through the provision of parking bays along Ballymun Road south of the school, which will put order on the situation during the busy arrival and departure times.

b) Ballymun Road will be narrowed from two northbound traffic lanes to a single northbound traffic lane approaching the entrance to the schools, which will have a strong traffic calming effect, and should lower traffic speeds.

c) There is congestion of pedestrians on the footpath at the bus stop in front of the school as may be seen in Figure 2-1-10. In the Proposed Scheme an island bus stop will be provided at this location with a new footpath passing to the rear of the island. This will improve the arrangement at the school, with a minor encroachment into the small green area in front of the school.

Figure 2-1-10: Busy pedestrian activity in front of Our Lady of Victories Schools

The works required for the Proposed Scheme near the entrance to the schools are very minor and can be completed in a few weeks. This work can be programmed for holiday periods when the schools are closed thereby avoiding any interference with access.

With regard to the potential overlap with Metro construction, it is acknowledged in Section 5.9 of Chapter 5 in Volume 2 of the EIAR, that the likely timelines of the Proposed Scheme construction works have considered the potential for simultaneous construction of, and cumulative impacts with other

infrastructure projects and developments which are proposed along, or in the vicinity of the Proposed Scheme. The likely significant cumulative impacts caused by the Proposed Scheme in combination with other existing or planned projects (including Metrolink) were identified and assessed in Chapter 21 (Cumulative Impacts & Environmental Interactions), in Volume 2 of the EIAR.

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.

As set out in Section 5.10 of Chapter 5 in Volume 2 of the EIAR, a Construction Environmental Management Plan (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 of 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). Details of mitigation measures proposed to address potential impacts arising from construction activities are described in Chapter 6 to Chapter 21 of Volume 2 of the EIAR, as appropriate, and are summarised in Chapter 22 (Summary of Mitigation & Monitoring Measures) in Volume 2 of the EIAR.

2.1.3.3 Relocation of Bus Stop No.37

Summary of issue raised

The submissions are concerned about the proposal to relocate the existing bus stop No.37 slightly further south where an island platform will be provided. The submissions mention existing activity at the bus stop that is categorised as anti-social behaviour and causes nuisance for local residents.

Response to issue raised

Bus Stop No.37 is a very busy and important stop that serves Dublin City University, and it has a double bus shelter at present. A full assessment was undertaken for the bus stops along the route as described in Appendix H of the Preliminary Design Report (Supplementary Information) which sought to optimise bus stop locations and spacing to serve the catchment area along the core bus corridor. This assessment confirmed that Bus Stop No.37 is one of the more important bus stops on this corridor as it serves Dublin City University. It is proposed to upgrade this bus stop to an island bus stop to replace the existing bus stop to provide generous waiting space to cater for congregations of passengers. This stop is currently located beside a boundary wall where the double shelter and a bin occupy most of the footpath and this causes a restriction of the footpath for pedestrians walking by. This bus stop will be moved a short distance southwards to where there is a public open space behind the footpath and an island bus stop will be provided so that the footpath and cycle track can pass behind the waiting area without obstruction.

The proposed relocation of the bus stop is shown on Figure 2-1-11, and it is necessary to resolve an existing unsatisfactory situation and to prevent obstruction of the proposed cycle track by stopping buses. There will be little or no impact at the green space where the new bus stop will be located, and it is not necessary to remove any trees.

Figure 2-1-11: Layout of proposed Bus Stop No.37 at Albert College Lawns

Relocation of the bus stop further away as is suggested in the submissions would not be appropriate as it needs to be located close to the entrance to Dublin City University and the associated passenger demand.

As described in the *Preliminary Design Guidance Booklet for BusConnects* (Appendix A4.1 in Volume 4 Part 1 of 4 of the EIAR) the bus stop island has been proposed as the standard solution all along the BusConnects programme to provides better safety and comfort for both cyclists and pedestrians.

The potential noise and vibration impacts, as a result of the Proposed Scheme has been assessed in the EIAR. The process of assessment and the results have been described in Chapter 9 (Noise & Vibration) in Volume 2 of the EIAR.

Specifically, Section 9.5.2.2 Bus Stops mentions:

> *"The impact assessment has determined that noise impacts associated with the provision of relocated or new bus stop locations will be Neutral to Positive, taking account of the prevailing noise environment dominated by road traffic and the proposed transition to electric and hybrid for the city bus fleet between the Opening Year (2028) and the Design Year (2043). No further noise mitigation measures are proposed."*

Any claimed antisocial behaviour will not be increased by the local relocation of the new bus stop. Security matters should be raised with An Garda Síochána.

The beech tree located at the green area is not impacted by the Proposed Scheme (see Figure 2-1-9), and the proposed works will happen at 10m distance approximately.

2.1.3.4 Loss of Parking on Ballymun Road at Albert College Park

Summary of issue raised

A narrow parking layby on Ballymun Road beside the boundary of Albert College Park with space for 10 cars will be removed in the Proposed Scheme.

Response to issue raised

This parking layby is sub-standard in width, and it compromises both the adjoining footpath and the bus lane. Parked cars extend out into the bus lane, and pedestrians have difficulty passing between the cars and the boundary where the footpath is too narrow. It is necessary in the Proposed Scheme to remove this car parking. There is a car park available inside Albert College Park.

As stated in Section 6.4.6.1.2.4 of Chapter 6 (Traffic & Transport) in Volume 2 of the EIAR, although 10 informal parking spaces have been removed in this section, 11 additional parking spaces have been provided at the opposite side of Ballymun Road further north. Specifically, in the whole section:

"…Although it is proposed that some of these parking spaces are removed, the overall changes result in the addition of 22 parking spaces. Taking cognisance of the reductions and additions, overall, the Proposed Scheme is anticipated to have a Positive, Slight and Long-Term effect on the parking and loading facilities along Section 1 of the Proposed Scheme"

In developing the design of the Proposed Scheme, the NTA has balanced the need to provide parking and within this constrained urban location with the objectives of the Proposed Scheme to provide high quality public transport, cycling and walking facilities through this area. As such, some parking spaces have been removed or relocated in close proximity to its current location.

2.1.3.5 Carola Reynolds – Relocation of Bus Stop No.39 to No.10/12 St. Mobhi Road

Summary of issue raised

This submission questions the need to move the existing bus stop from in front of No.96 Ballymun Road southwards to in front of No.10 to 12 St. Mobhi Road. The concerns include interaction with access to the driveways and the width of the footpath for the bus stop and shelter.

Response to issue raised

Bus Stop No.39 is currently located only 210m south of Stop. No.38 at Hampstead Avenue, and it is 200m north of Griffith Avenue. In the overall review of bus stop locations for the Proposed Scheme (as reported in the Supplementary Information, Preliminary Design Report, Appendix H) it was concluded to move this bus stop 90m south to increase the bus stop spacing closer to the optimum spacing of 400m, and to be closer to Griffith Avenue for interchange with the proposed future orbital bus services.

The location of the proposed bus stop is shown in Figures 2-12 and 2-13. There is a distance of 14m between the driveways at Nos.10 and 12 where an 11m long bus can stop without blocking the accesses. As detailed in the Preliminary Design Guidance Booklet (Appendix 4.1 in Volume 4 of the EIAR)., the cycle track will narrow to 1m wide when crossing the bus stop access area in front of the proposed bus shelter, where the footpath will be 2m wide. A narrow type bus shelter will be provided as shown in Preliminary Design Report Appendix H and illustrated in Figure 2-1-14.

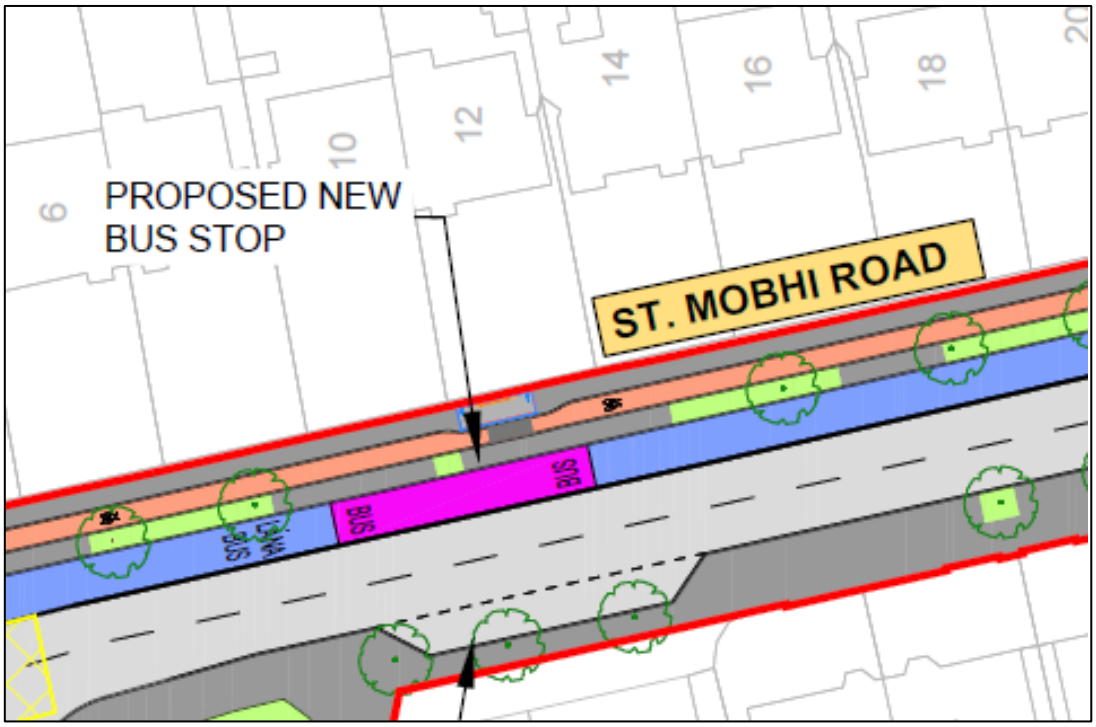


Figure 2-1-12: Proposed Location of Bus Stop No.39 (extract from General Arrangement Drawing Sheet No.8)

Figure 2-1-13: Proposed Location of Bus Stop No.39

Note: The lighting column will be removed and replaced just to the north of the tree as is shown on Sheet 8 of the '09. Street Lighting' drawings in Volume 3 of the EIAR.

Figure 2-1-14: Narrow Type Bus Shelter

2.1.3.6 *Various Submissions – Proposed Modifications at Griffith Avenue Gyratory*

Summary of issues raised

Several submissions commented on the recent and proposed modifications at the Griffith Avenue Traffic Gyratory:

- Declan and Audrey Dempsey (6 Cremore Crescent) welcome the change to allow eastbound traffic to continue directly across the junctions at Ballymun Road and St. Mobhi Road.
- Pat Rooney (55 Ballymun Road) says that the recently installed cycle tracks along Griffith Avenue are full of leaves and are not used by cyclists.
- Lesley Hewson, Lorraine Rooney and Alfreda Kavanagh (c/o 6 Prospect Square) say that there are delays to traffic at the eastbound left turn from Griffith Avenue to Ballymun Road.

Responses to issues raised

As shown in Figure 2-1-15, the Proposed Scheme will relocate the recently installed temporary cycle tracks on Griffith Avenue onto the verges, and it will reinstate the two eastbound traffic lanes approaching the junction at Ballymun Road. This should reduce eastbound traffic delays at that junction. The cycle tracks at verge level will be less inclined to become clogged with leaves compared to the raised kerbs for the on-road cycle tracks.

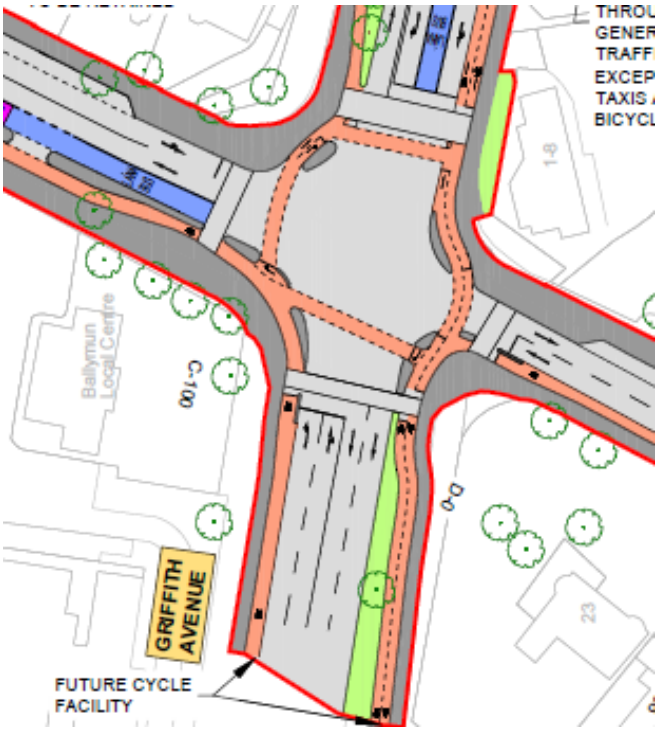


Figure 2-1-15: Extract from General Arrangement Sheet 8

2.1.3.7 *Kevina McGill - Right turn from St. Canice's Road onto Ballymun Road*

Summary of issue raised

This submission mentions a turning ban from St .Canice's Road onto Ballymun Road southbound.

Response to issue raised

This is a misunderstanding of the design: the right turn is permitted at this junction, as can be seen in the '10. Junction System Design' drawings in Volume 3 of the EIAR, where the Indicative Method of Control shows clearly the allowed right turn movement at phase E when traffic from St. Canice's Road can turn either left or right onto Ballymun Road. The provision of new traffic signals at this junction will make it easier and safer to cross the wide Ballymun Road from St. Canice's Road in the southbound direction.

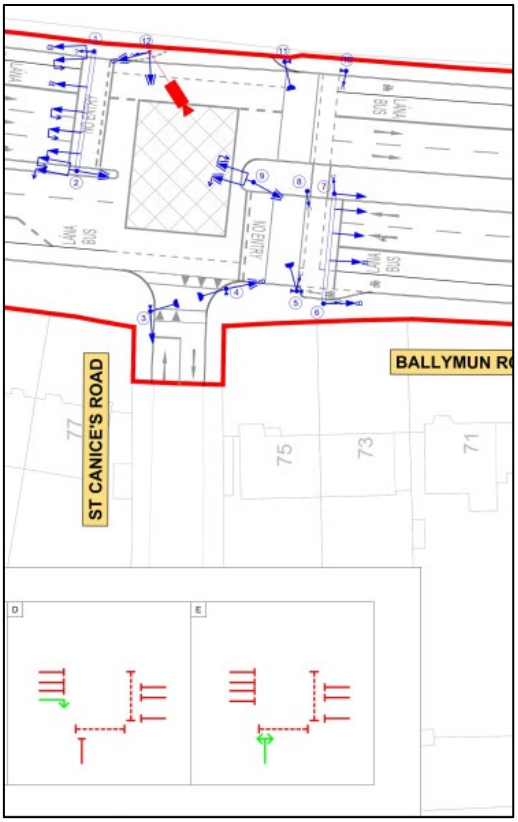


Figure 2-1-16: Extract from drawing BCIDD-ROT-TSM_SJ-0304_XX_00-DR-CR-0010 – Junction system design for St Canice's Road / Ballymun Road junction

2.2 Section 2: Proposed Scheme at St. Mobhi Road and Botanic Road from Griffith Avenue to Hart's Corner

2.2.1 Description of Proposed Scheme at this Location

As set out in Section 4.5.2 of Chapter 4 (Proposed Scheme Description) in Volume 2 of the EIAR, this section commences at the R108 St. Mobhi Road / R102 Griffith Avenue Junction and will extend for 1.5km to Hart's Corner north of Phibsborough, where it will meet the Finglas Section of the Proposed Scheme.

A northbound Bus Gate will be provided on R108 St. Mobhi Road at the southern arm of the junction with R102 Griffith Avenue to provide appropriate priority for bus services where no bus lane is provided in the northbound direction due to width constraints. Segregated cycling tracks will be provided on each side of the street generally, with a two-way cycle track section proposed on part of the eastern side of R108 St. Mobhi Road to cater for higher flow of pedestrians and cyclists accessing a cluster of schools and sports clubs on that side of the road.

Northbound through-traffic will be diverted at Hart's Corner via R135 Finglas Road instead of R108 Botanic Road. This traffic may then traverse eastward at Old Finglas Road to re-join R108 Ballymun Road at R102 Griffith Avenue. A second local traffic diversion route will divert away from R108 St. Mobhi Road along Botanic Road, Glasnevin Hill, Old Finglas Road, Cremore Villas and R102 Griffith Avenue to re-join R108 Ballymun Road. To the west of R108 St. Mobhi Road, a short section of Ballymun Road Lower between Claremont Avenue and Church Avenue will be restricted to a one-way southbound general traffic lane where the road is too narrow for two-way traffic alongside on-street parking at houses without driveways.

An offline segregated two-way cycle track will be provided through the public open space on the southern side of St. Mobhi Drive along the north bank of the River Tolka. Eastbound traffic access to R108 St. Mobhi Road from St. Mobhi Drive will be prohibited to reduce traffic flows along this narrow residential street.

On R108 Botanic Road, south of the junction with R108 St. Mobhi Road, there is a narrow section of street where bus lanes cannot be accommodated. Instead, bus priority will be provided by signal controls at the upstream approaches to this section in both directions. Segregated cycle tracks will be provided on R108 Botanic Road as an upgrade of the existing advisory cycle lanes. Once R108 Botanic Road becomes wider at the former print- works, bus lanes will be provided in both directions.

In this section there are four traffic signal junctions. Protected cycle tracks are proposed at each junction to maintain segregation from traffic to the greatest degree possible.

Extracts from the General Arrangement Drawings, which are provided in Volume 3 of the EIAR, are included below in Figures 2-2-1 to 2-2-8.

There is an area of overlap in the submissions in relation to the Proposed Scheme at the Griffith Avenue traffic gyratory, which is in Section 1, but the traffic impacts of the proposed Bus Gate at St. Mobhi Road will extend across both Section 2 and Section 1. Numerous submissions were received from people living north of Griffith Avenue in this regard.

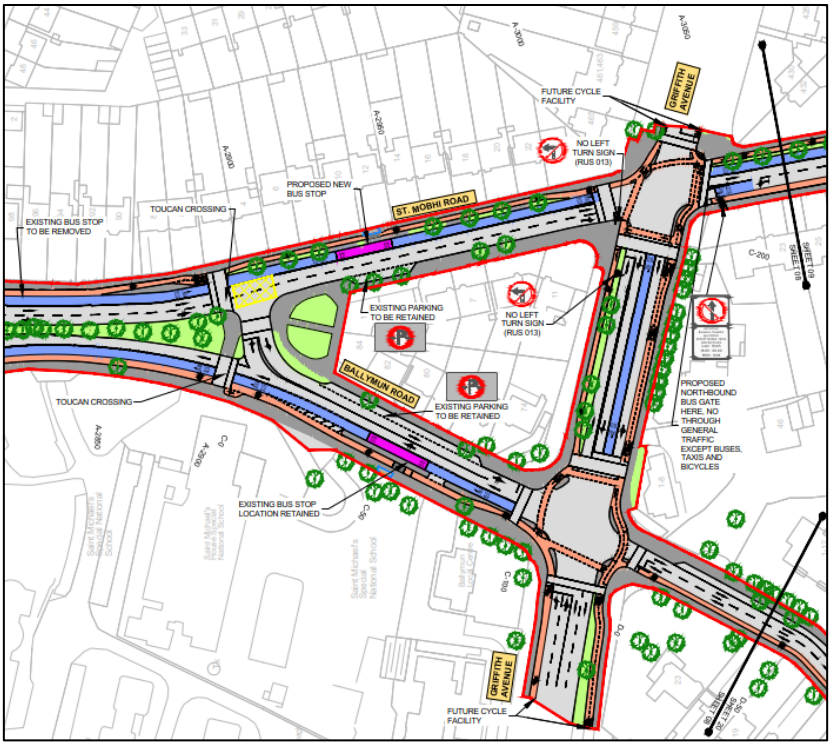


Figure 2-2-9: Extract from General Arrangement Drawing Sheet 8 (repeated from Section 1)

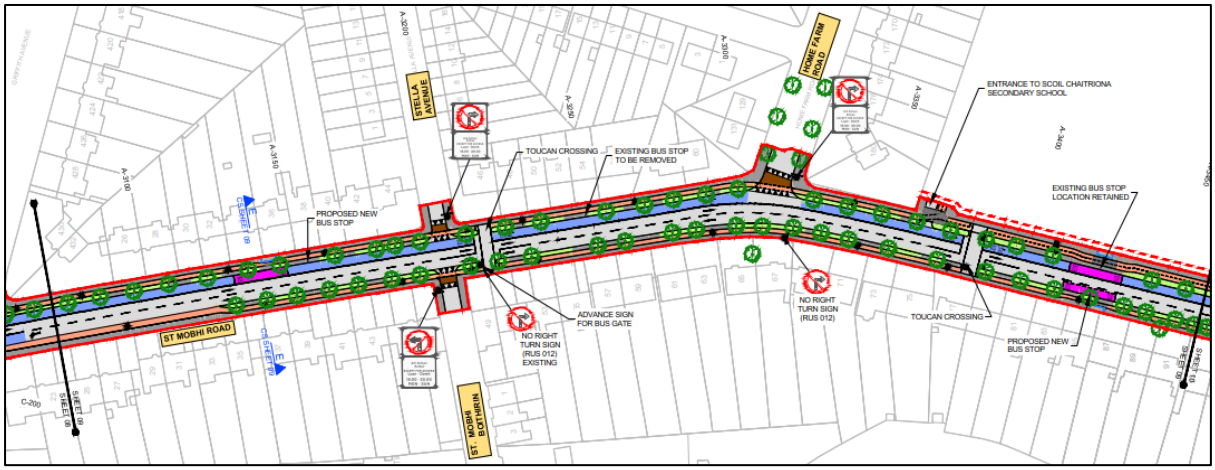


Figure 2-2-2: General Arrangement Drawing Sheet 9

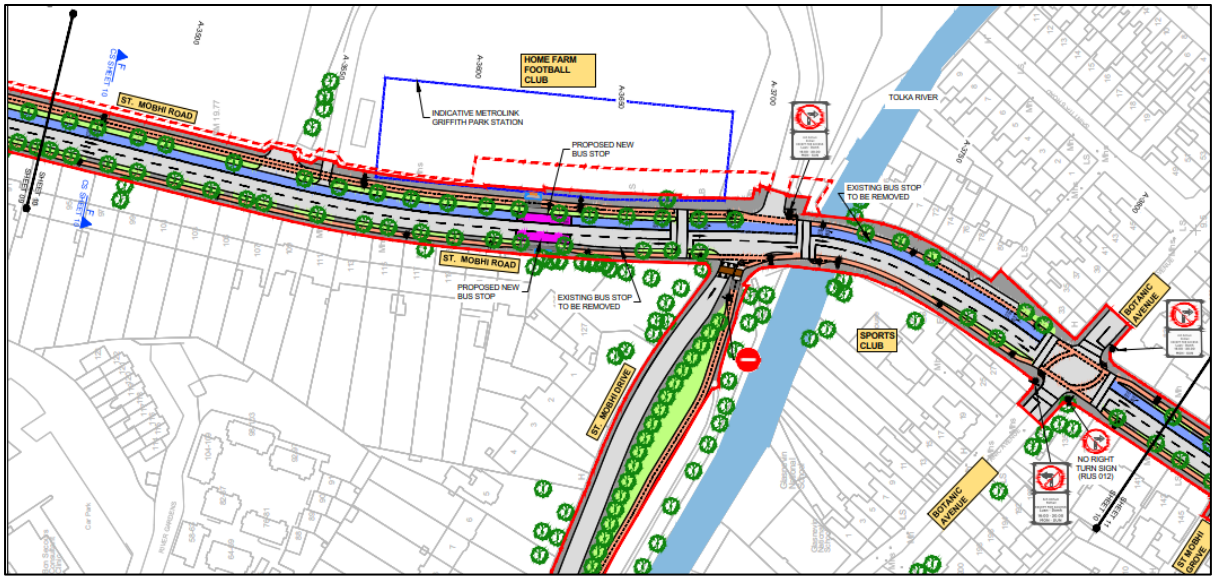


Figure 2-2-3: General Arrangement Drawing Sheet 10

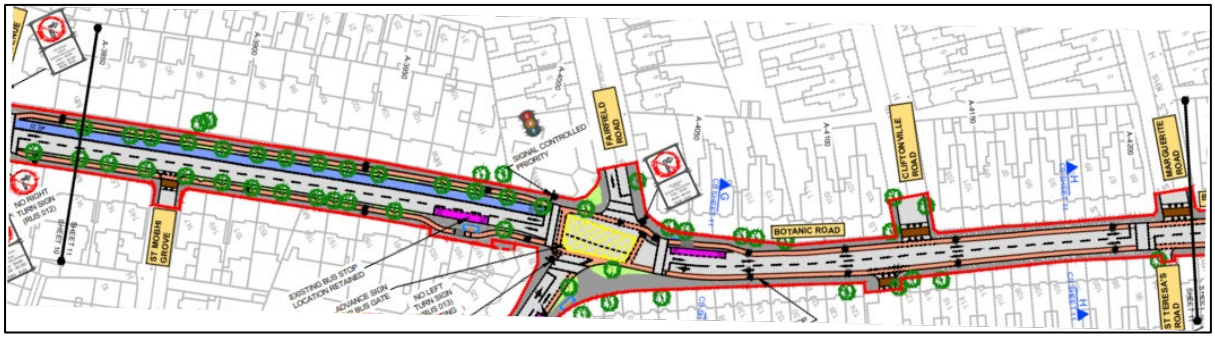


Figure 2-2-4: from General Arrangement Drawing Sheet 11

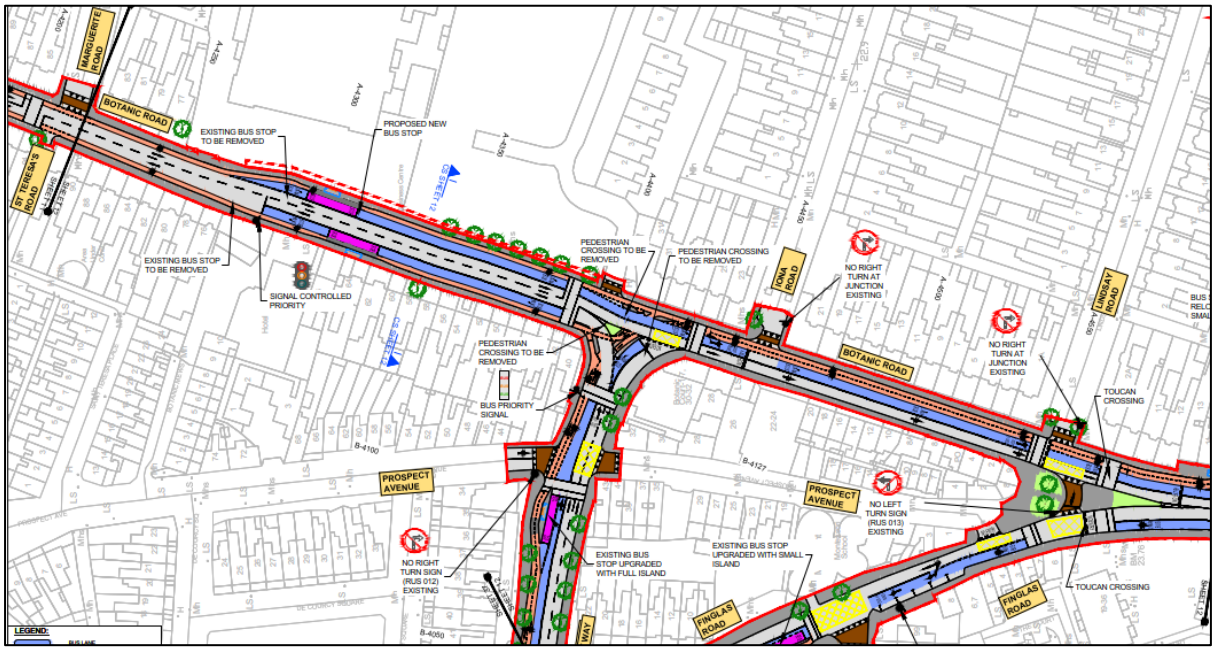


Figure 2-2-5: General Arrangement Drawing Sheet 12

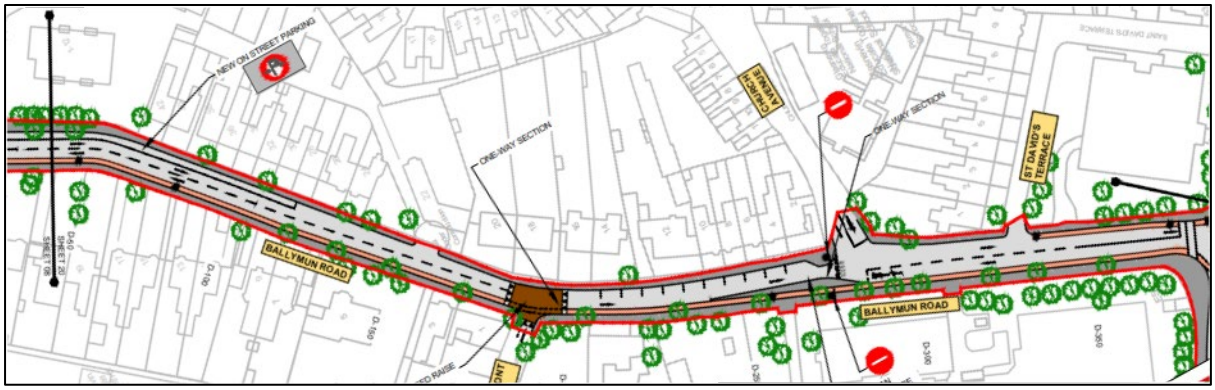


Figure 2-2-6: General Arrangement Drawing Sheet 20

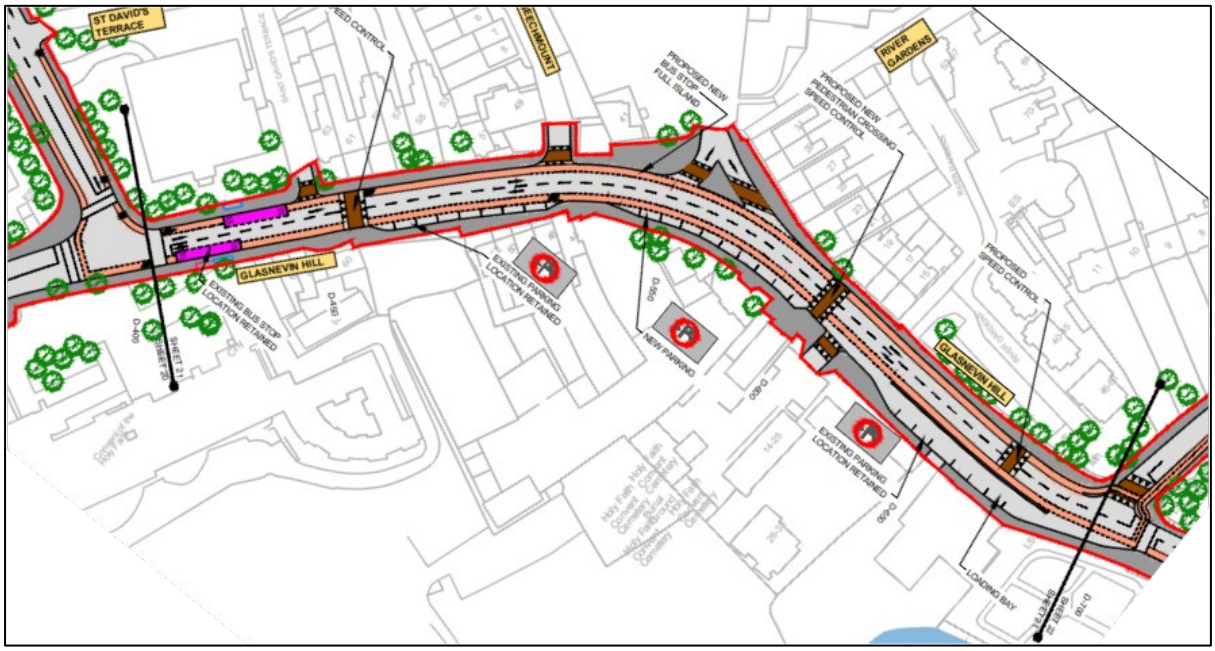


Figure 2-2-7: General Arrangement Drawing Sheet 21

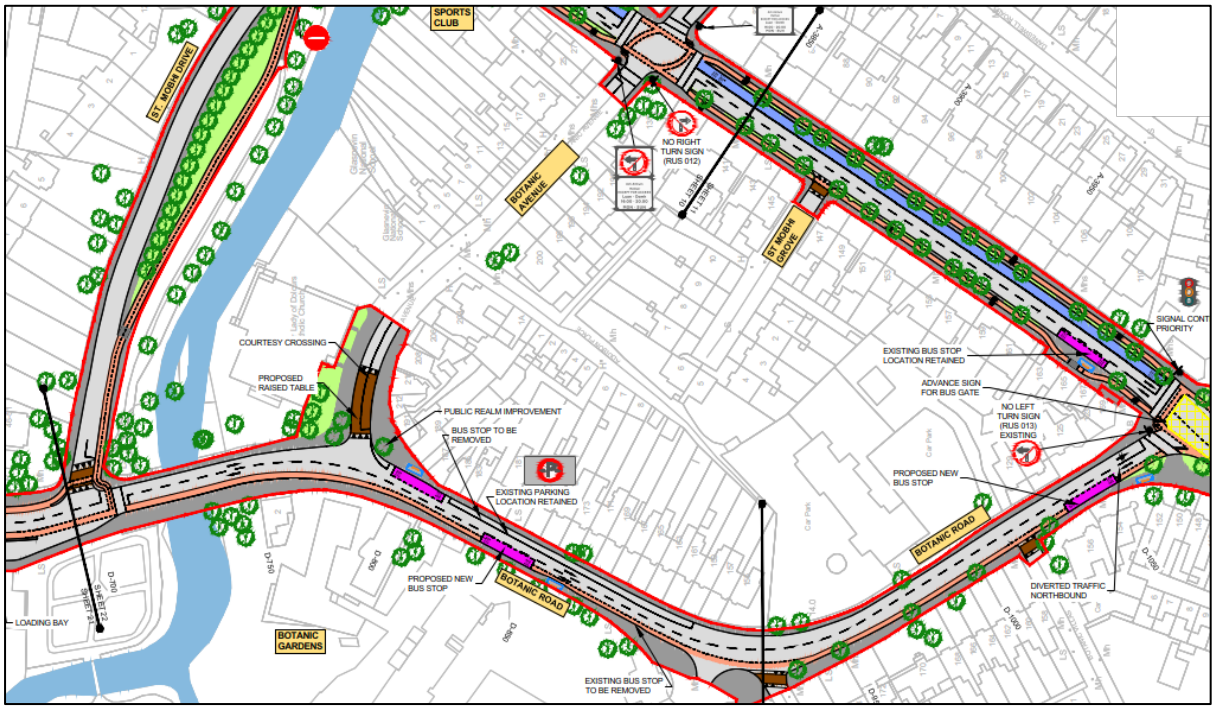


Figure 2-2-8: General Arrangement Drawing Sheet 22

2.2.2 Overview of Submissions Received

Table 2.1 below lists the individual submissions made in respect of the Proposed Scheme in Section 2 from Griffith Avenue to Hart's Corner.

Table 2.2: Submissions for Section 2

No	Name	No	Name	No	Name
1	Aidan Power	24	Glasilawn area / Tolka Estate Active Group	47	Mary & Brian Lambert
2	Ann Moynihan	25	Glasilawn Avenue Residents Association	46	Martina Creaven
3	Anna Bourke	28	Glasilawn Road Residents Association	49	Maureen Smyth
4	Annette Murphy	29	Glasnevin Village Residents association	51	Niamh & Ger Davis and others
5	Annmarie & Ciaran Rogers	30	Griffith Avenue and District Residents Association GADRA	53	Pat Rooney
6	Ballygall road East Residents	32	Iona & District Residents Association (Rory Flynn)	54	Paul McAuliffe TD
8	Bill Reddington	33	Jean Keogh	55	Paul McLoughlin and others
9	Brendan Heneghan	34	John Deegan and others	56	Peter & Anna Dore
11	Carmel Sherry	36	John Lillis	57	Philip Lynch and others
12	Carola Reynolds	37	Katherine Kelliher	58	Ray Linn
13	Ciaran & Laura Byrne	38	Kathleen Cuffe	59	Tolka Estate residents
14	Collette D'Arcy	39	Kevin & Helen Summons-Walsh	60	Richard and Susan Dunne and others
16	David & Anette Ryan and others	40	Kevina McGill	61	Roisin Shortall TD
17	David Kerins and others	41	Lesley Hewson and others	62	Sean & Natalie L'Estrange and others
18	Declan & Audrey Dempsey	42	Louise Rainford	66	Cremore Residents Association
19	Deirdre Dalton and others	43	Maeve O'Neill	68	Wadelai Hillcrest & District Resident Association

Common views / issues are listed below and described in Section 2.2.3

- Implications of the proposed Bus Gate at St. Mobhi Road and traffic diversion though Glasnevin (traffic, safety, pedestrians, Village character, rat-running, last changes at Griffith Avenue, not included in EIAR)
- Implications of the proposed closure of Ballymun Road to northbound traffic from Claremont Avenue to Church Avenue.
- Concerns about the design of the footpaths and cycle tracks behind green verge at St. Mobhi Road.
- Request for the scheme to be extended to City Centre.
- Complaints about the shortcomings in publicising the Public Consultations in the area.

A small number of submissions raised some more specific issues which are listed below and described in Section 2.2.8.

2.2.3 Bus Gate at St. Mobhi Road and traffic diversion though Glasnevin (traffic, safety, pedestrians, noise and pollution, Village character, EIAR)

Summary of issue raised

Most of the submissions for Section 2 raised concerns about the traffic that the proposed Bus Gate will divert onto Botanic Road – Glasnevin Hill – Old Finglas Road – Cremore Villas – Griffith Avenue. The submissions claim that these roads do not have enough capacity and are already congested at peak hours, that there would be increased pollution and noise, and hindrance for access by emergency services.

Some submissions raised concerns about the traffic congestion at Griffith Avenue which induces rat-running up along Ballygall Road to St Canice's Road and St Pappin Road, with the subsequent impact on these residential areas.

The regional diversion route along Finglas Road is included in some submissions, claiming that Finglas Road is already congested, including the junction with Old Finglas Road, and that Old Finglas Road is not supposed to be a main artery.

Many submissions have concerns about safety problems for children walking and cycling to schools or sports, and for elderly pedestrians due to increased traffic though Glasnevin during Bus Gate hours.

A further impact would be delay for the No.83 bus service along the traffic diversion route which would discourage people to the use the bus service.

Many submissions say that the full extents for the Glasnevin area affected by the Traffic Diversions proposed (eastern section of Old Finglas Road, Cremore Villas and Griffith Avenue) have not been included in the study area of the EIAR, or outline that such coverage in the EIAR documents could not be located. This requires information about traffic impact, noise, pollution, etc.

Some submissions say that increased traffic will reduce the quality of daily life in Glasnevin Village.

Response to issue raised

Chapter 6 (Traffic & Transport) in Volume 2 of the EIAR describes the likely traffic and transport impacts of the Proposed Scheme. The most significant impact will be a general reduction in traffic volumes heading to and from the city centre, as is illustrated on Diagram 6.9 for the AM Peak Hour on page 120 of Chapter 6 (extract below).

6.4.6.2.2.3 2043 AM Peak Hour People Movement

Diagram 6.9 illustrates the People Movement by mode inbound towards the City Centre during the AM Peak Hour in 2043 along the Proposed Scheme.

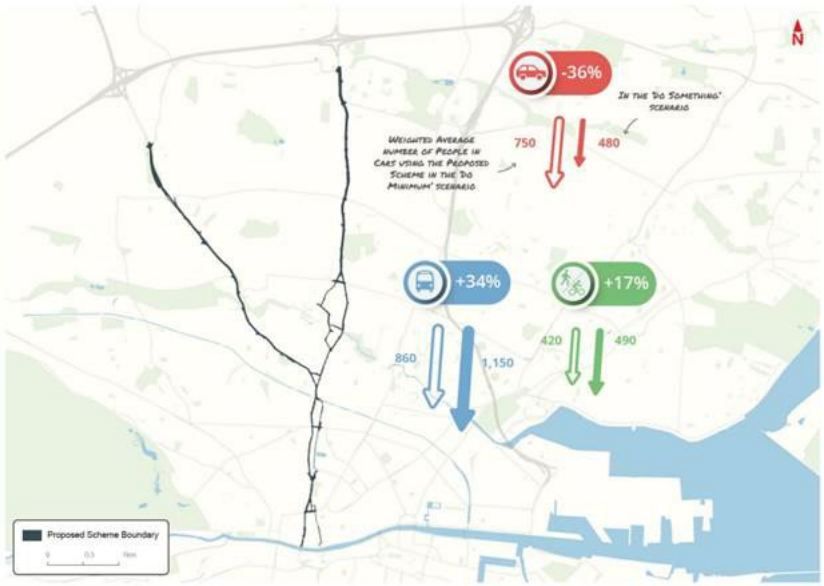


Diagram 6.9: Weighted Average People Movement by Mode during 2043 AM Peak Hour

The Transport Impact Assessment shows a reduction of -36% in car passengers towards the city centre in the morning peak hour and a corresponding increase of + 34% bus passengers and +17% walking and cycling. Those trips that shift mode in the morning will also return in the evening by the same mode.

The proportional reduction in traffic and increase for other modes will be even greater in the evening peak. Diagram 6.10 in Chapter 6 (page 121) (extract below) of Volume 2 of the EIAR shows a reduction of -44% in car passengers from the city centre in the evening peak hour and a corresponding increase of +56% bus passengers and +21% walking and cycling.

Diagram 6.10 illustrates the People Movement by mode travelling outbound from the City Centre during the PM Peak Hour in 2043 along the Proposed Scheme.

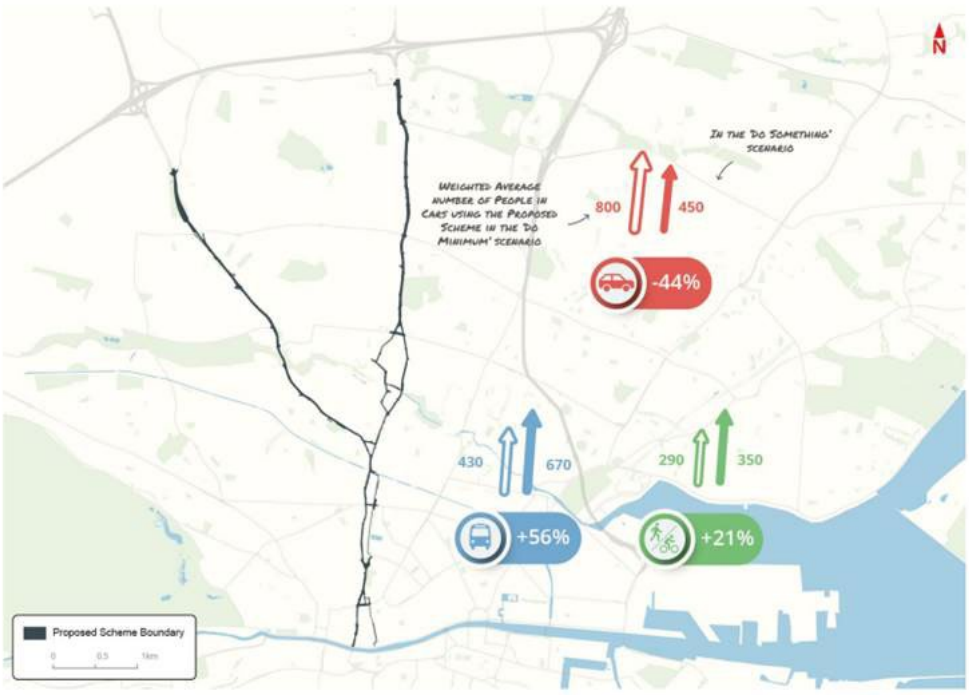


Diagram 6.10: Weighted Average People Movement by Mode during 2043 PM Peak Hour

Most radial streets in the catchment area of the Ballymun / Finglas Core Bus Corridors will therefore experience a significant reduction in traffic flows. This is listed in Tables 6.76, 6.77, 6.80 and 6.81 in Chapter 6 in Volume 2 of the EIAR for streets where the reduction will be more than 100 Passenger Car Units (PCUs) per hour (the threshold noted in section 6.4.6.2.9.2 Significance of the General Traffic Impact – Diagram 6.48 of Chapter 6). Diagram 6.42 provides a map that highlights what changes in traffic are indicated in the traffic model with routes in blue showing a reduction of at least 100 PCUs per hour. Some very large reductions in traffic (PCUs per hour in the two directions) are expected along the route in the PM peak including (Table 6.80, page 163 of Chapter 6 in Volume 2 of the EIAR):

- Finglas Road: - 570 PCU
- Ballymun Road: - 682 PCU
- Constitution Hill: - 399 PCU

These reductions will spread out across the road network onto most of the adjoining streets.

The context of a widespread and overall reduction in traffic on the network is important to consider in relation to the localised effects of traffic diverted by the proposed northbound Bus Gate near the northern end of St. Mobhi Road in the PM peak. The Bus Gate is necessary to ensure reliable and faster bus services over a 1km long section of the corridor where bus lanes cannot be provided. Several alternative routes may be taken by traffic as follows, depending on their origin and destinations:

a) Traffic from the city centre may divert to other routes to the east such as Drumcondra Road, or even the Dublin Tunnel.

b) Traffic towards the western side of Ballymun and east of Finglas may use Finglas Road.

c) Local traffic from north of Hart's Corner will divert onto Glasnevin Hill.

This set of alternative routes will greatly dilute the displacement effects of the diverted traffic on other routes. In many cases the locally displaced traffic will be considerably less than the overall reduction in traffic due to the shift to other modes. For example, the traffic on Finglas Road will still be much lower than in the Do-Minimum scenario, even with the transfer of some traffic away from St. Mobhi Road, and the net reduction of 570 PCUs per hour, includes this transfer of some traffic away from the Bus Gate.

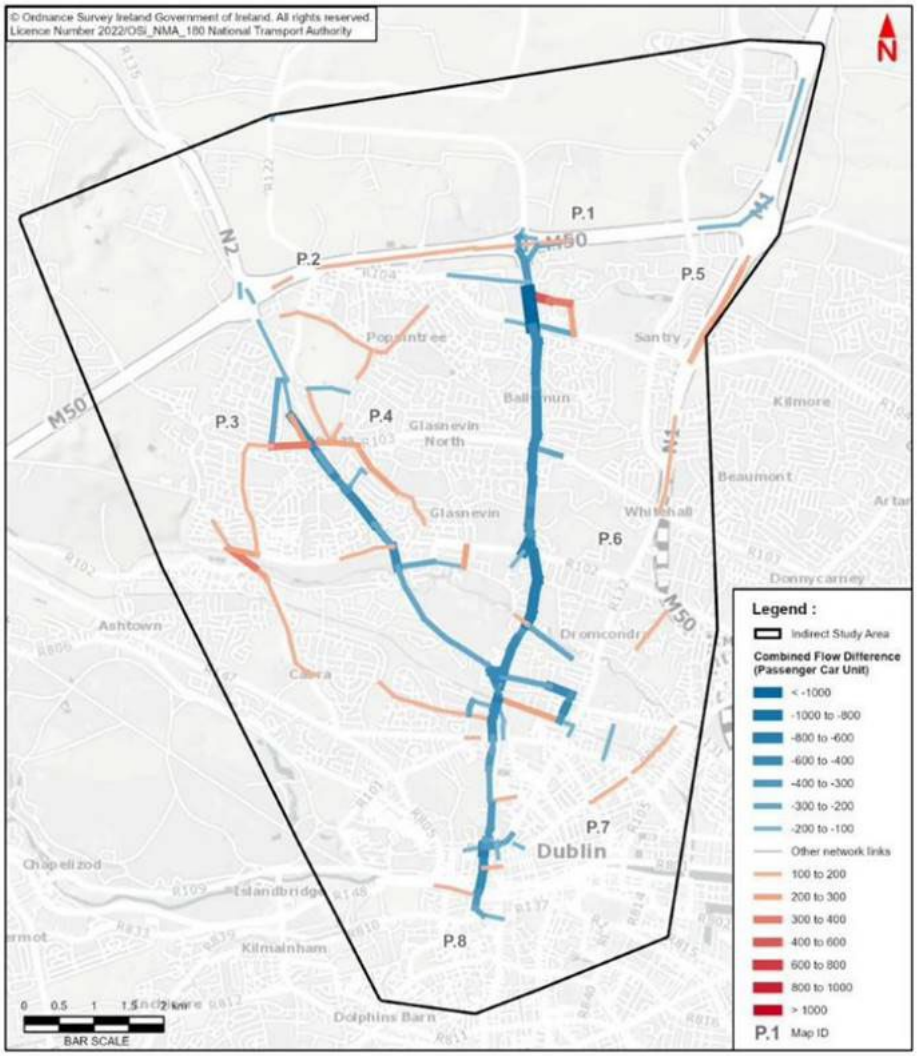


Diagram 6.42: Flow Difference on Road Links (Do Minimum vs Do Something), PM Peak Hour, Opening Year (2028) Impact on Direct Study Area (PM Peak Hour)

In some places there will however be an increase in traffic due to the diversion from the Bus Gate:

- Ballygall Road East (and Cremore Villas): 477 + 266 = 743 (Table 6.82 on page 165 of Chapter 6)

The volume of 266 additional vehicles per hour is relatively modest, but it will arise in the context of a fairly quiet route, and therefore appears proportionately higher. As noted in Tables 26 and 27 in Appendix A6.4 Impact Assessments in Volume 4 Part 2 of 4 of the EIAR for PM peak hour in 2028 and 2043, the Significance of Effect at all the Ballygall Road East (and Cremore Villas) junctions, as a result of the Proposed Scheme, has been determined as "Not Significant" in relation to the Transport Impact Assessment.

On the other hand there will be a net reduction in traffic on Old Finglas Road (-192) and on Glasnevin Hill (-103) even with the Bus Gate in operation. This is likely due to traffic using Finglas Road from Hart's Corner rather than Botanic Road and continuing north past the junction at Old Finglas Road due to the overall reduction in traffic flow along that route. Many drivers will choose alternative routes from close to the origin of their trip rather than directly re-routing just before the Bus Gate section, which will

limit the amount of traffic that would turn left at the southern end of St. Mobhi Road and proceed along Botanic Road and Glasnevin Hill instead.

The overall effect of the Bus Gate on St. Mobhi Road will therefore be to lead to an increase in traffic on just a section of one alternative route at Cremore Villas and the southern end of Ballygall Road East. The traffic model does not indicate any appreciable change in traffic further north at St. Canice's Road or St. Pappin Road as feared in various submissions from residents in those areas, with any change in traffic flows not set to exceed the threshold noted in Section 6.4.6.2.9.2 (Significance of the General Traffic Impact – Diagram 6.48 of Chapter 6 in Volume 2 of the EIAR).

Potential Impacts due to Diverted Traffic

The full extents of the Glasnevin area affected by the likely changes in traffic patterns (Glasnevin Hill, Old Finglas Road, Cremore Villas / Ballygall Road East and Griffith Avenue) were included in the study area of the EIAR. The assessment considered the expected traffic impacts as summarised above, and the associated impacts for noise, air quality, etc. and these are fully considered in the relevant chapters of the EIAR. On most of the roads in the area there will not be an increase in traffic for the reasons explained earlier. In the one case of Cremore Villas at the southern end of Ballygall Road East, there will be an increase in traffic during the evening peak period (only), but this change is minor in terms of environmental effects and will not give rise to perceptible changes in noise and air quality.

The submissions raised a number of specific concerns about the potential implications of changes in traffic flows as follows:

a) Traffic delays at junction of Griffith Avenue and Ballymun Road.

b) Traffic pressure on Finglas Road at Old Finglas Road junction.

c) Safety near schools.

d) Delays to the No.83 bus.

e) Broader environmental impacts.

f) Quality of life in Glasnevin Village

There may have been a recent change in traffic delays at the junction of Griffith Avenue and Ballymun Road due to the temporary removal of one of the two eastbound traffic lanes on Griffith Avenue to provide space for a temporary cycle track installed during the Covid-19 pandemic. This change will be reversed in the Proposed Scheme and the second traffic lane will be reinstated. (Cycle tracks will be located on the verges at the junction instead). With the removal of northbound traffic on St. Mobhi Road, this will displace some of that traffic from making a westbound right-turn at Ballymun Road to making an eastbound left-turn instead. The traffic signal timings will be rebalanced accordingly with more green time for the western arm of the junction that will cater for any additional traffic from the west. The traffic model shows no further traffic displacement northwards to St. Canice's Road or St. Pappin Road.

There is existing traffic pressure on Finglas Road at the Old Finglas Road junction in the northbound right-turn direction where the turning traffic queue can exceed the length of the right-turn lane. In the Proposed Scheme this right turn lane will be lengthened from 35m to 70m thereby doubling the storage capacity. The traffic model indicates a significant reduction in traffic along Finglas Road generally, and more signal time can be allocated to the northbound right-turn as necessary to eliminate any queuing and delay.

Safety near schools will not be an issue in the context of the proposed Bus Gate at St. Mobhi Road and the operational hours for the Bus Gate will commence at 4pm after the schools finish for the day. In addition the Proposed Scheme will greatly increase the cycling facilities in the general area, with an upgrade from cycle lanes to segregated cycle tracks on Glasnevin Hill, and on Ballymun Road northbound to Griffith Avenue.

Delays to the No.83 bus will be minimal on the short section of Cremore Villas and the southern end of Ballygall Road East where a modest increase in traffic will occur in the northbound direction in the PM peak period. This will not deter passengers from using a service that will benefit from the bus priority measures in the Proposed Scheme along Church Street, Constitution Hill, Phibsborough Road, through Hart's Corner and along the southern part of Botanic Road. Overall this bus route will become considerably quicker and more reliable where it follows the core bus corridor.

Broader environmental impacts of the changes in traffic are fully assessed in Chapter 7 (Air Quality), Chapter 9 (Noise & Vibration), and Chapter 11 (Human Health), etc. in Volume 2 of the EIAR. There are no specific mentions of impacts in the Glasnevin West area because none have been identified in the assessment, as this area is remote from the main traffic routes.

For Glasnevin Village it is appreciated that a degree of change will arise due to the Proposed Scheme and the diversion of some traffic away from St. Mobhi Road, albeit that the TIA indicates an overall reduction in traffic on Botanic Road, Glasnevin Hill and Old Finglas Road. Several improvements are proposed in Glasnevin Village to benefit the quality of life of the local community as follows:

a) A public realm scheme is proposed in the heart of the village at the junction of Botanic Road / Botanic Avenue / Glasnevin Hill. This will greatly narrow the mouth of the junction to shorten the crossing distance between the church and the shops with a raised platform courtesy crossing. (Traffic signals are not necessary here as the traffic volumes are only modest). There will be an enlarged seating area provided at the café and shops with planter beds to shield it from traffic.

b) A section of the future *Tolka Valley Greenway* will be provided along the north bank of the river to link from Glasnevin Hill to St. Mobhi Road.

c) The existing northbound cycle lane on Glasnevin Hill will be upgraded to a segregated cycle track, and a new southbound cycle track will be provided. These cycle tracks will link via the River Tolka to the segregated cycle route from St. Mobhi Road towards the city centre.

d) Pedestrian facilities will be generally improved along Glasnevin Hill with raised table crossings at all side roads and a new pedestrian signal crossing at the shop near the Bon Secours Hospital.

e) Speed ramps will be provided across Glasnevin Hill to slow traffic.

2.2.4 Closure of Ballymun Road section to northbound traffic

Summary of issue raised

Many of the submissions claim that the most direct and natural path for the northbound traffic diverted from the Bus Gate should be onto Ballymun Road. Many submissions request retention of 2-way traffic on Ballymun Road, or to reverse the direction and make the section one-way northbound.

Response to issue raised

The southern part of Ballymun Road between Church Avenue and Claremont Avenue is quite narrow, and cars are usually parked on the eastern side of the road at a row of houses without driveways. There is not enough space for two-way traffic to pass without northbound traffic encroaching into the cycle lane as shown in Figure 2-2-9. If this section of Ballymun Road were to be restricted to northbound one-way traffic only it would prove a very direct and attractive alternative route to St. Mobhi Road when the northbound Bus Gate is operational in the evening peak period. There would be a simple transfer of all the traffic from one road onto the other and the cycle route would be badly impacted. Instead the traffic diversion strategy is to encourage traffic to disperse more widely across the road network so as to dilute the impact on any one street. There are a number of wider and more suitable roads further west including Cremore Villas (the southern end of Ballygall Road East) which can better accommodate two-way traffic than the narrow Ballymun Road at the southern end. In this regard it is preferable for more traffic to use Finglas Road which is a suitably wide road without residential frontage beyond the short stretch immediately north of Hart's Corner. Overall, therefore it is in the interest of the wider community in the Glasnevin area for the displaced traffic to be dispersed as widely as possible by not providing a simple and attractive alternative route to St. Mobhi Road. In this respect the restriction of the narrow section near the southern end of Ballymun Road to one-way southbound will be helpful in deflecting through traffic away from the area from as far upstream as Hart's Corner.

Figure 2-2-9: Narrow section of Ballymun Road between Church Avenue and Claremont Avenue

2.2.5 Width of footpath and cycle tracks on St. Mobhi Road

Summary of issue raised

Safety of pedestrians and cyclists

Many submissions raised concerns about the safety of the proposed design with both the cycle track and the footpath located in the space behind the green verge and the front of the houses. Mainly the concern is that the reduced width of the footpath and cycle track will give rise to conflicts between pedestrians and cyclists. Another concern is that on collection day bins will be on the footpath reducing the effective width and push pedestrians into the cycle track

Trees at Na Fianna and St. Mobhi Road

Construction of a 2-way cycle track on the eastern side of St. Mobhi Road at Na Fianna and Home Farm Football Club, requires removing a significant number of mature trees in the private land to be taken. This removal is objected to by some submissions. Some submissions have concerns about the possible impact on the roots of the mature trees along St. Mobhi Road, by the construction of the cycle track beside the green verge.

Response to issue raised

A major factor raised by many people in the early public consultations for the Proposed Scheme was the desire to retain the existing mature plane trees along St. Mobhi Road. To enable the trees to be retained the Proposed Scheme will reduce the existing 2.8m wide footpaths to 1.8m which is the minimum permitted in the *Design Manual for Urban Roads and Streets*. This is appropriate on a suburban residential street with low pedestrian flows along most of the length. A wider 2.5m footpath is proposed along the frontage of the schools and sports clubs on the eastern side of the road where pedestrian activity is greater, linking to the River Tolka corridor which connects east and west to the wider neighbourhood. Only a narrow 1.25m cycle track can be provided between the footpath and the trees as shown in Figure 2-2-10, which will provide for single file cycling.

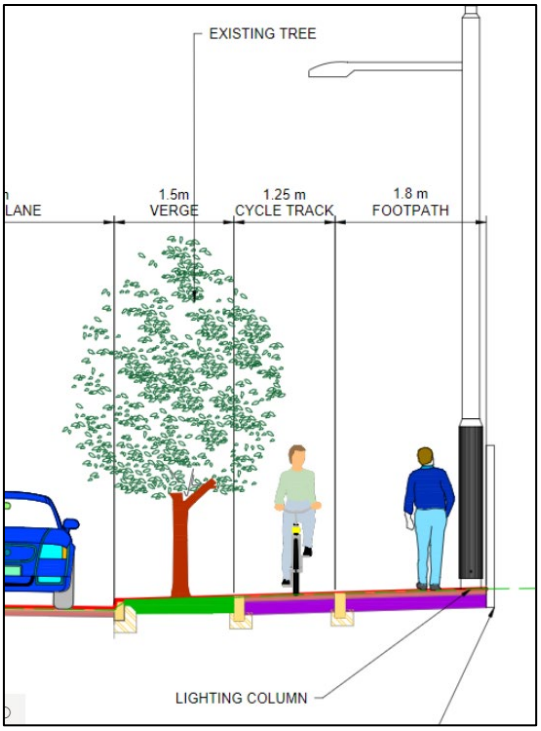


Figure 2-2-10: Extract from Typical Sections Drawing – St. Mobhi Road

As is indicated on the typical cross section an embedded kerb separator is proposed to delineate the separation of the cycle track from the footpath, which will assist the safety of both pedestrians and cyclists in this location where space is constrained. This kerb line will form a tactile separator, and there are numerous suitable kerb products available for this purpose of which an example is shown in Figure 2-2-11. If the cycle track level were lower than the footpath level, this would require deeper excavation along the verge side which would likely damage the roots of the existing trees, and possibly cause the trees to eventually die.

Strasbourg, France

Carrickmines, Dublin

Figure 2-2-11: Examples of a tactile separator kerb between the footpath and cycle track

On St. Mobhi Road the existing concrete footpaths will be saw cut to allow removal of the outer 1m width and the remaining 1.8m width along the boundary will be retained. Once the 10cm deep concrete slab is removed the existing granular sub-base will be exposed and reused without disturbance as the foundation for the cycle track. As the proposed cycle track will be 1.25m wide, this will require a little excavation of the grass verge along a 25cm wide strip at the edge of the existing footpath to a depth of up to 15cm. Hand excavation will be undertaken to minimise risk of damage to any shallow tree roots, which will be suitably protected. Appendix A of the Arboricultural Impact Assessment report (EIAR Volume 4, Part 4, Appendix A17.1) recommends the following works measures to protect the tree roots in the verges along St. Mobhi Road:

> *"Construction of cycle path to east of trunk. Recommend use of Cellweb or equivalent to protect roots, with AirSpade excavation to minimise disturbance to reduce impact on roots."*

The new cycle track will require a narrow strip of gravel sub-base along the outer edge, and then new tar macadam will be provided for the cycle track surface. These techniques have been used

successfully elsewhere across Dublin in the past where cycle tracks and footpaths have been constructed sensitively beside existing trees.

At Na Fianna, and at Home Farm Football Club, the existing large conifer trees along the boundary will be removed to enable widening of the footpath and cycle track along the eastern side of the public road. Replacement planting of new trees is proposed, subject to agreement with the property owners as this planting will be located on the retained private lands. It is not therefore appropriate to show such details in the Proposed Scheme drawings prior to the necessary agreement of the landowner. It is expected that the replacement trees will be deciduous and more compatible than the existing trees beside the mature plane trees along the street. Photomontages of the Proposed Scheme are included in Figure 17.2 in Volume 3 of the EIAR for which the images for St. Mobhi Road are shown in Figure 2-2-12 and 2-2-13.

Figure 2-2-12: Photomontage of St. Mobhi Road – Existing

Figure 2-2-13: Photomontage of St. Mobhi Road - Proposed

Encroachment by bins, which are 0.55m wide, will allow 1.35m of free width to pass along, which is over the minimum at pinch-points recommended by accessibility standards (Building for Everyone: A Universal Design Approach) as shown in Figure 2-2-14.

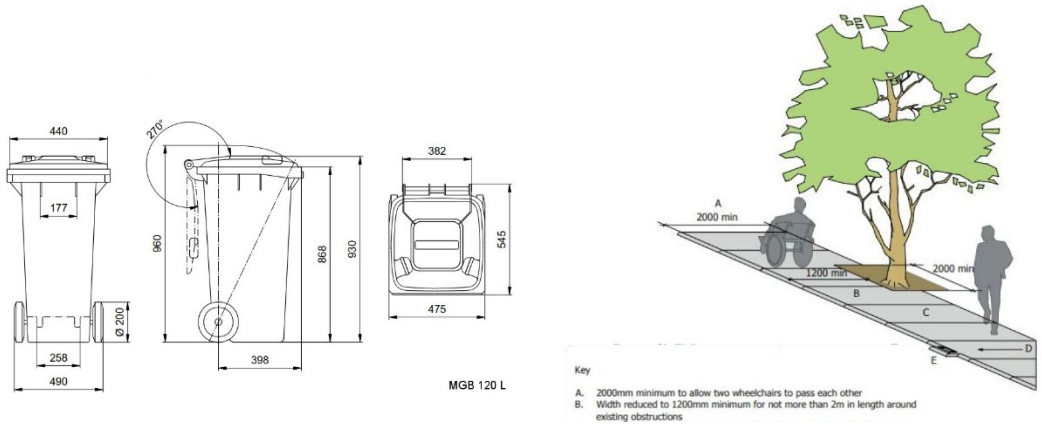


Figure 2-2-14: Typical dimensions of bins and accessibility recommendations from Building for Everyone: A Universal Design Approach

2.2.6 Other Issues

2.2.6.1 Paul McAuliffe TD – Access for Griffith Gyratory residents

Summary of issue raised

Between other comments coincident with common views, this submission raises the following query:

- *Clarity is needed on -how those who live and operate businesses on the gyratory on St Mobhi Road/Ballymun Road will access driveways, on street 'parking and surrounding roads without being diverted long distances in order to travel towards Hart's Corner.*

Response to issue raised

There will be no change in access for the properties at the Griffith Avenue Gyratory towards Hart's Corner as they will continue to be able to circulate clockwise around the triangular road system and head south down St. Mobhi Road.

2.2.6.2 Kathleen Cuffe - Alternative Signal Controlled Bus Priority at Southern end of St. Mobhi Road

Summary of issue raised

This submission proposes an alternative solution for the southern part of St. Mobhi Road with a signal-controlled priority section between Botanic Avenue and Fairfield Road and to provide the cycle tracks on the carriageway beside the traffic lanes.

Response to issue raised

There is a limit to the length of road on which signal-controlled bus priority will operate effectively, and it is preferable to only use this arrangement over short lengths where there is no alternative. On the southern end of St. Mobhi the situation is the same as for the rest of the road further north and there is adequate room for a southbound bus lane as well as segregated cycle tracks behind the trees. If the signal-controlled priority were extended 200m further north from Fairfield Road to Botanic Avenue, it would double the length of the signal-controlled priority section, which would become more challenging to ensure it was fully effective to achieve the necessary degree of reliability for bus priority.

2.2.6.3 *Declan & Audrey Ramsey, Philip Lynch and others – Measures to improve Access to Schools*

The following issue has been raised in 2 submissions, one from Declan & Audrey Ramsey and another shared by Philip Lynch, Kathy Carrol, Andrew & Louise Loughlin and Dave & Hellen Kelly.

Summary of issue raised

This submission requests the following measures:

1) Increase school bus service
2) Improve No.83 bus service at school times
3) Incentivise students to walk to schools
4) Increase schools capacity at Santry and Northwood to reduce traffic to schools in Glasnevin

Response to issue raised

These matters are not directly related to the Proposed Scheme.

2.2.6.4 *Iona & District Residents Association (IDRA) – Traffic management for construction and operational phase*

Summary of issue raised

The IDRA submission has concerns about the traffic and subsequent Concerns of the Iona District residents about through traffic and associated safety issues in the area:

- Rat running through the district, especially along Iona Road and Lindsay Road
- Pollution coming from busy surrounding roads
- Safety problems for cyclists running along arterial roads conflicts with traffic turning into the district for rat-running
- 30km/h speed limit being ignored by motorists. This creates safety problems for schools.
- Road signage ignored
- Narrow footpaths, with users forced into roads, often occupied by parked vehicles

The submission requests some measures to improve this situation.

Construction and operational phases of the Proposed Scheme, and Metrolink construction phase, will impact on the district and increase these effects.

The request is to provide a specific Traffic Management Plan in Construction and Operational phase for Iona District.

Response to issues raised

Most of the issues currently exist, are not actually related to the Proposed Scheme, and there will be no changes associated with the Proposed Scheme.

A Construction Traffic Management Plan (CTMP) will be generated by the appointed contractor in the Construction Phase in the context of minimising disruption in surrounding streets.

A Traffic Management Plan for the area could be developed separately by DCC.

With regard to the potential overlap with Metro construction, it is acknowledged in Section 5.9 of Chapter 5 in Volume 2 of the EIAR, that the likely timelines of the Proposed Scheme construction works have considered the potential for simultaneous construction of, and cumulative impacts with other infrastructure projects and developments which are proposed along, or in the vicinity of the Proposed

Scheme. The likely significant cumulative impacts caused by the Proposed Scheme in combination with other existing or planned projects (including Metrolink) were identified and assessed in Chapter 21 (Cumulative Impacts & Environmental Interactions), in Volume 2 of the EIAR.

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.

As set out in Section 5.10 of Chapter 5 in Volume 2 of the EIAR, a Construction Environmental Management Plan (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.

2.2.6.5 Katherine Kelliher – Additional pedestrian crossing at Botanic Gardens and Public Realm at Botanic Avenue

Summary of issue raised

This submission requests a pedestrian crossing at the Botanic Gardens gate, to also help to traffic calming, and not reduce the public space at footpath with bus shelter at the Botanic Avenue / Botanic Road junction.

Response to issue raised

The need for a pedestrian crossing on Botanic Road at the Botanic Gardens was not evident to the design team for BusConnects and this was not included in the scheme. Perhaps this is a matter that could be raised with Dublin City Council?

The proposed public realm works at the junction of Botanic Road and Botanic Avenue provides an opportunity to move southbound Bus Stop No.183 further north to where there will be a wider footpath.

2.2.6.6 Kathleen Cuffe – Traffic turning from Prospect Road onto Finglas Road

Summary of issue raised

Between other comments coincident with common views, these submissions raise the following issue and requests, for Prospect Road at Hart's corner.

> *The removal of the additional dedicated road for turning left onto the Finglas road will result in a longer backlog of cars. This will make the priority signalling proposed at the top of Mobhi Road, as the traffic will still prevent a bus from travelling up. You will need to insert a very big yellow box, for car users to then ignore.*

Response to issue raised

The submission describes the wrong direction where it says "turning left" should be "turning right" at the southern apex of the Hart's Corner gyratory. There is relatively little traffic that makes this turn, mainly coming from Iona Road, and the long right-hand traffic lane is little utilised. Traffic modelling has shown that the removal of this lane will have negligible impact, and it is necessary to provide the road space for the proposed two-way cycle track along the eastern side of the street.

2.2.6.7 Ray Linn– Traffic impact on Swords

Summary of issue raised

As a resident in the Swords Road area, this submission raises concerns that northbound traffic currently running along St. Mobhi Road / Ballymun Road, can be diverted to Swords Road and increase traffic congestion in that route, due to the extension of length for the northbound traffic due to the Bus Gate at St. Mobhi Road

Response to issue raised

Traffic modelling has shown that the displacement of traffic from St. Mobhi Road eastwards onto the Drumcondra Road will be just over 100 vehicles per hour and will have negligible impact on that route.

2.2.6.8 Pat Rooney– Inconsistency ABP-BC drawings, Access to property, More Bus Routes

Summary of issue raised

Between other comments coincident with common views, this submission raises the following issues:

a) *The maps on An Board Pleanála website and the plans on the Bus Connects website do not match up.*

b) *As a resident of 55 Ballymun Road and someone who has no option but to use a private vehicle for transport due to trade and carrying tools the proposed plans will add hours to my journey and many other residents of the area. The position of my house with the proposed plans and new road directions means my house is now extreme inaccessible from many directions.*

c) *I would propose that it would benefit the area more to add more routes to this area. For example, currently If the residents of the area (Glasnevin/Ballymun) need to travel to the airport there is no direct bus route.*

Response to issues raised

a) The maps for the Proposed Scheme are displayed on a dedicated project website at 'ballymunfinglasscheme.ie' which is linked from the main BusConnects website, and this is a requirement of An Bord Pleanála which also hosts the application documentation directly at 314610 | An Bord Pleanála (pleanala.ie) . It is not clear what is meant in this submission about inconsistency in this regard. The same Location Maps and General Arrangement Maps are shown on both websites and there are no differences between the two locations.

b) For access to No.55 Ballymun Road which is located 130m north of the Griffith Avenue gyratory there will be no change in the direct access to and from the property. Like all other traffic the resident will need to take an alternative route northbound from the city when the proposed Bus Gate at St. Mobhi Road is operational in the evening peak period.

c) The BusConnects Network Redesign, which is separate from the Proposed Scheme to construct the necessary infrastructure on the core bus corridor, includes a proposed new Routes No.19 along Ballymun Road and No.24 from Botanic Road via Finglas and Charlestown to Dublin Airport.

2.2.6.9 Lesley Hewson and others– Concerns about 2-way cycle track at Prospect Way

Summary of issue raised

Between other comments coincident with common views, this submission has concerns about the 2-way cycle track on Prospect Way at Hart's Corner, raising the following issues:

- Turning from Prospect Way onto Prospect Avenue is considered currently dangerous, and the 2-way cycle track will make it more difficult.
- Shared spaces and concerns on the interaction between cyclists and pedestrians, especially elderly pedestrians, who will have to negotiate the cycle track to cross the road at Prospect Way / Prospect Avenue junction.
- Concerns about how the proposed design works at the junctions of Prospect Way / Prospect Avenue and Prospect Way / Botanic Road.
- Requests clarification about the public realm improvements of Botanic Road and environs.

Response to issue raised

Traffic turning left from Prospect Way will be quite unlikely to encounter westbound cyclists on the two-way cycle track as the cyclists will only cross from the far side of Botanic Road when the left-turning northbound traffic is stopped at signals, and vice-versa. Therefore, the turning movement will take place after the bus lane has been cleared by the bus-priority signal (a short distance ahead), and the driver will only have to look out for eastbound cyclists and pedestrians at the entry into the side street, which is just like any minor junction on a main road with a cycle track on the edge.

The proposed cycle tracks along Prospect Way with the associated junction crossings at Botanic Road and Finglas Road at each end will have extensive traffic signal controls to enable cyclists to cross the various traffic streams and pedestrian routes separately and safely. At all pedestrian crossings, cyclists will be controlled by a red signal when the green pedestrian signal is operational and there will be no mixing of the two modes. Neither will there be any shared spaces in this fully segregated system.

The Bus-Priority Signal will be located just before the left-turn from Prospect Way onto Botanic Road northbound. It will be activated by a bus leaving the bus stop a short distance upstream and it will stop the general northbound traffic to let the bus make the sharp turn ahead of traffic where there is not enough road space for both a bus lane and a general traffic lane at the corner. The traffic control system will track the bus through the Hart's Corner gyratory system and will coordinate the traffic signals so as to minimise delay for the bus at this junction.

At the junction of Prospect Avenue and Prospect Way, a new pedestrian signal will be provided on the western side of the junction, in response to requests in earlier public consultations. This will be an improvement for the community north of Prospect Way with a safe and more direct walking route towards Phibsborough.

There will be urban realm improvement works at two locations on Botanic Road:

- At the junction of Botanic Road, Fairfield Road and St. Mobhi Road where the footpath will be widened substantially at the southwest corner as shown on Sheet 11 of the '02.General Arrangement' drawings in Volume 3 of the EIAR.
- At the junction with Botanic Avenue where the footpath will be widened substantially at the southern side as shown on Sheet 22 of the '02.General Arrangement' drawings in Volume 3 of the EIAR.

2.2.6.10 Róisín Shortall TD– Griffith Gyratory arrangement, vulnerable passengers and parking at Glasnevin

As well as issues in common with others that have been addressed previously, this submission raises other specific issues as follows:

Issue raised - *Griffith Avenue Gyratory*

> *"This gyratory triangle is currently a one-way system and if it were to become two way then it must be adequately signposted, and parking must be retained for the businesses situated on the triangle. The creation of a two-way system is likely to create difficulty for cars and delivery vehicles going northbound to access the existing parking on the western side of the triangle where there are several businesses. It is therefore important that the centre line on this section of carriageway would be a broken line in order to allow access to the parking area outside the business premises."*

Response to issue raised

Access will be available for northbound traffic on Ballymun Road to the driveways and parking on the eastern side of the road within the triangle of the gyratory traffic system. Under Traffic Regulations it is permissible to cross a continuous white centreline road marking to access a property or a parking space. Southbound traffic on the western side of the gyratory system will arrive intermittently when released by the right-turn traffic signal at the northern end of the triangular island. Between these traffic movements there will be opportunities for northbound vehicles to cross the southbound traffic lane to reach a driveway or parking space. Alternatively a northbound vehicle could continue another 250m north to the junction at Hampstead Avenue and make a U-turn to approach the parking from the

southbound direction on their left-hand side which would remove the need to cross the opposing traffic lane.

Issue raised - *Vulnerable Pedestrians*

> *" there are concerns about inadequate consideration of the needs of older people and those with a disability, either intellectual or physical. There seems to have been very little direct consultation with disability and older persons' groups, given the frequency of island bus stops and dangerous crossings. The expectation that all bus users can easily walk to change buses, or cross busy junctions, shows insufficient understanding of the needs of older people, people with mobility impairments and those with disabilities."*

Response to issue raised

The movements of vulnerable pedestrians have been carefully provided for across all of the BusConnects Core Bus Corridor schemes in terms of adequate footpath widths, segregation from cycle tracks, separation in traffic signal crossings generally (other than at toucan crossings where appropriate), and for access at bus stops.

Section 4.4 in Chapter 4 of Volume 2 of the EIAR addresses 'Design Principles' for Accessibility for mobility impaired users which is a core element of the Proposed Scheme design, and it has been informed by the following guidance as described in Section 4.6.5 in Chapter 4 of Volume 2 of the EIAR:

- Design Manual for Urban Roads and Streets (DMURS),
- Building for Everyone: A Universal Design Approach,
- How Walkable is Your Town (NDA 2015),
- Shared Space, Shared Surfaces and Home Zones from a Universal Design Approach for the Urban Environment in Ireland (NDA 2012),
- Best Practice Guidelines, Designing Accessible Environments (Irish Wheelchair Association 2020),
- Inclusive Mobility (UK DfT 2005), Guidance on the Use of Tactile Paving Surfaces, and
- the British Standards Institution (BSI) BS8300-1:2018 Design of an accessible and inclusive built environment - External environment – Code of practice (BSI 2018).

Accessibility is also addressed in Chapter 12 of the Preliminary Design Guidance Booklet for BusConnects (PDGB) in Appendix A4.1 of Volume 4 of the EIAR.

Specifically in this Proposed Scheme the following provisions are included for the safety and comfort of all pedestrians:

a) Cyclists are fully segregated from pedestrians at traffic signal junctions.

b) Toucan crossings are included at intervals along the Ballymun Road and Finglas Road dual carriageways to enable pedestrians and cyclists to cross the wide road at greater convenience. The numbers of people using these crossings together will be small, and shared use is therefore appropriate under the "pedestrian priority" principle that is well established at such crossings that have been in use widely for many years.

c) In most places the proposed cycle tracks will be separated from the footpath by either a grass verge, or an upstand kerb. Where the cycle track needs to be at a similar level to the footpath on St. Mobhi Road, so as to protect the roots of the existing mature trees, a special tactile separator kerb will be provided, as has been illustrated earlier in this report.

d) The provisions for managing the interface between pedestrians and cyclists at bus stops are defined in the *Preliminary Design Guidance Booklet for BusConnects* (included as Appendix A4.1 in Volume 4 Part 1 of 4 of the EIAR), and as described earlier in this report. Pedestrians will have priority at crossings at bus stop islands where there will be an option for pedestrians to call a signal to oblige cyclists to stop when the pedestrian wishes to cross the cycle track.

e) Shared use of space between pedestrians and cyclists is largely avoided in the Proposed Scheme apart from at a number of short greenway sections. One of these sections is at the Royal Canal crossing where segregation is impractical for the numerous crossing movements

in the north-south and east-west directions, with associated turning at the intersection with the *Royal Canal Greenway*. The same provision will also apply over a short section of *Royal Canal Bank* where a new shared path will be provided through the park area and under the proposed bridge at North Circular Road. These will be very slow speed environments that will be self-regulating due to busyness, and they will operate under the "pedestrian priority" principle.

Issue raised - *Parking in Glasnevin*

"Parking in Glasnevin Village has become a significant issue in recent years. Residents maintain that due to the relative proximity of Glasnevin Village to the city, the absence of sufficient on-site parking in the Bon Secours Hospital and the Botanic Gardens, and the availability of free all-day parking, the Village is overrun with private cars. With an increased traffic flow expected through Glasnevin Village due to BusConnects, it is imperative that preventative action is taken to deal with parking issues.

Glasnevin Village (Residents) Association (included later in section 2.2.6.16) have suggested the following actions:

- *More 'Park and Ride' facilities should be introduced on the outskirts of the city;*
- *Paid parking should be introduced throughout the Village;*
- *Off-street parking at the Botanic Gardens should be increased;*
- *Address parking (for drop off/pick up purposes) outside the schools;*
- *Improved enforcement of traffic laws — both electronically and in person."*

Responses to issue raised

The Proposed Scheme is neutral in relation to parking in the Glasnevin Village area, and it is not within the scope of the BusConnects programme to address the concerns of the local community about parking issues generally which is a matter for Dublin City Council.

2.2.6.11 David Kerins and Nicola Callaghan– Bus shelters at St. Mobhi Road

Summary of issue raised

As well as issues in common with others that have been addressed previously, this submission raises other specific issues as follows:

Unnecessary Introduction of Bus Shelters

- *The building of new bus shelters was not subject to public consultation and the details are incomplete*
- *There is no design of the proposed bus shelters available*
- *Building a bus shelter against a garden will result in a loss of access to maintain railings and hedges*
- *There will be an accumulation of rubbish behind shelter, which will not be accessible for proper collection and disposal*
- *The shelter will bring increased illumination from signage, which will impact our home*
- *Ultimately these changes will reduce value of homes and there is no need for shelters if the frequency and timing of the buses are consistent and reliable*

The changes will cause a personal impact

- *There will be an increased risk going in and out of home as a householder*
- *Once a bus stops outside our home it will block other buses, leading to a queue of buses outside our house, reducing our privacy.*

Response to issue raised

Bus stop shelters are a necessary feature for the comfort and shelter of people waiting for a bus, and they will be provided at all bus stops in the Proposed Scheme, and generally across all of the other core bus corridors. This submission relates to Bus Stop No.40 which will be located about 100m south of the junction of St. Mobhi Road and Griffith Avenue. It will be used for passengers to interchange from Orbital Bus Route N2, which will increase the likelihood of passengers needing to wait a few minutes for southbound bus on Spine E. In this context the need for a shelter at the bus stop will be greater than usual. Appendix H of the Preliminary Design Report included in the Supplementary Information includes the Bus Stop Review Report, which sets out a comprehensive exercise that was carried out to review existing bus stops along the route of the Proposed Scheme and, where appropriate to rationalise these stops in line with best practice principles related to bus stop placement. That review identified the need to move Bus Stop No.40 from in front of No.54/56 St. Mobhi Road 110m further north closer to Griffith Avenue at No.34/36 St. Mobhi Road.

On St. Mobhi Road, where the footpath will be 2m wide at the bus stops, a narrow type bus shelter will be provided as shown in Preliminary Design Report Appendix H and illustrated in Figure 2-14. This submission is by the residents of No.34 St. Mobhi Road, and the location of the proposed relocated bus stop No.40 is shown in Figure 2-2-16.

The proposed bus shelter design avoids the risk of accumulation of rubbish behind the shelter with a continuous backing panel and a gap at the base to prevent items becoming trapped. As may be seen in Figure 2-2-15 the illuminated sign panels in the shelter are on the rear wall and face outwards to the road. Light-spill from the shelter towards the houses behind will be minimal.

A key objective of BusConnects is to achieve regular and reliable bus frequencies that will minimise bunching, which would be inefficient. It is unlikely therefore that two buses would arrive at this stop simultaneously and block the driveway of house No.34. There is sufficient space between the two driveways on each side of the bus stop for the stopped bus not to impede access to either of them.

Figure 2-2-15: Narrow Type Bus Shelter

Figure 2-2-16: Proposed Location for Bus Stop No.40 at No.34 & 36 St. Mobhi Road

2.2.6.12 John Lillis– Time scale for traffic diversions

Summary of issue raised

As well as issues in common with others that have been addressed previously, this submission raises another specific issue as follows:

> *"With traffic being diverted at Hart's corner and the Finglas Road planned to provide some relief for traffic in Ballygall/Glasnevin area, I presume that the bus connect project is not going to be planned at the same time as the bus connect project on Ballymun Road and St. Mobhi Road. Having two connected routes on either side of Ballygall/Glasnevin will be a traffic disaster."*

Response to issue raised

Traffic diversion at Hart's Corner along Finglas Road to Old Finglas Road, is proposed as the regional traffic diversion during the St. Mobhi Road Bus Gate operation hours, so the necessary directional signage will be installed when the Bus Gate is implemented.

The works on the Finglas Section of the Proposed Scheme will not interfere with the diverted traffic as the works along Finglas Road, including to modify the right turn lane at the Finglas Road / Old Finglas Road junction, will be completed in advance of the commencement of the operation of the proposed Bus Gate on St. Mobhi Road.

A full response was provided earlier in Section 2.2.3 that describes the predicted changes in traffic patterns with the Proposed Scheme, where there will be a set of alternative routes that will greatly dilute the displacement effects of the diverted traffic from St. Mobhi Road in the PM peak period. In many cases the locally displaced traffic will be considerably less than the overall reduction in traffic due to the shift to other modes. For example, the traffic on Finglas Road will still be much lower than in the Do-Minimum scenario, even with the transfer of some traffic away from St. Mobhi Road, and the net reduction of 570 PCUs per hour, includes this transfer of some traffic away from the Bus Gate.

2.2.6.13 Carmel Sherry – Botanic Avenue / Botanic Road Junction

Issue raised

"Sight lines for this traffic turning right from Botanic Avenue towards Glasnevin Hill are seriously restricted even now. Bus Connect propose to move the inward bus stop closer to the T junction.

I suggested a traffic light at this junction in my previous submissions to BusConnects but can't find any consideration of this proposal at all. The pedestrian lights on the other side of the River Tolka could easily be replaced with traffic lights at this T junction."

Response to issue raised

A public realm scheme is proposed in the heart of the village at the junction of Botanic Road / Botanic Avenue / Glasnevin Hill. This will greatly narrow the mouth of the junction to shorten the pedestrian crossing distance between the church and the shops with a raised platform courtesy crossing. In the new road layout the stop line on Botanic Avenue will move forward by 3 metres into Botanic Road which will improve the visibility for drivers in both directions, and outside of the dwell area for the proposed relocated bus stop. There is a left-hand bend on Glasnevin Hill heading northwards, which will further extend the visibility to the right for drivers to see oncoming traffic. Traffic signals are not necessary here as the traffic volumes are only modest.

2.2.6.14 Sean and Natalie L'Estrange – Griffith Avenue Gyratory

Summary of issue raised

This submission comes from the residents at 16 St. Mobhi Road, located at the section coincident with the northern side of the Griffith Gyratory triangle. Between other comments coincident with common views, raises the following issues and queries:

- *"No turn left onto Griffith Avenue for property No. 2 — No. 22 St. Mobhi Road (Access onto Griffith Avenue Eastbound)*
- *Right turn Access from property No. 2 - No. 22 St. Mobhi Road to Griffith Avenue Extension and onto Ballymun Road Northbound - Unclear*
- *With cycle track on pathway there will be no ability to reverse into your property. This leaves no option but to reverse out of your driveway which under current car insurance policies leaves you at fault if any collision.*
- *Unclear on plans how large bus shelter will be, or where positioned on path between property No 10 & No 12 St. Mobhi Road which could lead to obstruction of view when leaving property. Currently no issues with obstruction with current bus stop at the Rise on Ballymun Road which is due to be removed. Also another bus shelter in very short proximity at Albert College Park where there are no residential properties."*

Responses to issues raised

For the residents of the houses at No.2 to 22 St. Mobhi Road who wish to turn east onto Griffith Avenue, they will need to drive south along St. Mobhi Road and turn left at either Stella Avenue (which is very narrow) or at Home Farm Road loop in a clockwise direction via Rathlin Road or Lambay Road to join Griffith Avenue further east. These residents can continue to head west onto Griffith Avenue as at present since there will be no change to the right-turn southbound from St. Mobhi Road.

The provision of a proposed cycle track alongside the footpath on the eastern side of St. Mobhi Road will not prevent residents from reversing their car into their driveway. For such manoeuvres at present the driver already has to take care of southbound cyclists and pedestrians.

Appendix H of the Preliminary Design Report included in the Supplementary Information includes the Bus Stop Review Report, which sets out a comprehensive exercise that was carried out to review existing bus stops along the route of the Proposed Scheme and, where appropriate to rationalise these stops in line with best practice principles related to bus stop placement. That review identified the need to move Bus Stop No.39 from in front of No.96 Ballymun Road 100m further south to in front of No.10/12 St. Mobhi Road to be closer to Griffith Avenue. This will increase the spacing from the preceding Bus

Stop No.38 at Hampstead Avenue (Albert College Park) which is only 200m north of the existing Bus Stop No.39 location.

The proposed bus stop between the driveways at Nos.10 and 12 will be a narrow type bus shelter as shown in Preliminary Design Report Appendix H, which will be positioned beside the boundary wall at a distance of 4.5m back from the road edge. The shelter will not interfere with sightlines from the driveways. The proposed bus stop will be 300m from the nearest one to the north at Albert College Park and it is therefore necessary to serve the local catchment area.

2.2.6.15 Brendan Heneghan – Bus Gate Operational Hours

Issue raised:

This submission questions why the proposed Bus Gate on St. Mobhi Road should operate at weekends and not just on week days.

Response to issue raised:

The operation of a traffic management measure is more effective if it is as simple as possible to follow. In this regard it is best for the Bus Gate to operate 7 days per week, which will reduce the information to be communicated to drivers on advance signs. It will also be easier for drivers to remember that they should avoid this route always in the evening. Traffic on Saturdays can often be as busy as a weekday, particularly with large local trip attractors such as the GAA and soccer clubs, and there will be a need to safeguard the reliability of bus services running to their timetable and headways at all times, which will be guaranteed by 7-day operation of the proposed Bus Gate.

2.2.6.16 Glasnevin Village Residents Association

Summary of issues raised

a) Ensure enforcement of bus lanes.

b) Measures to address illegal parking especially outside the Botanic Gardens.

c) Traffic calming measures along Glasnevin Hill.

d) Retain all existing pedestrian crossings including at 85 St. Mobhi Road.

e) Safety of locating two bus stops on opposite sides of St. Mobhi Road.

f) Revisit the Bus Gate operation times to reduce impacts when the effect is clear.

Responses to issues raised:

a) Enforcement of Bus Lanes

The NTA agrees that enforcement of the bus priority measures will be essential to the successful operation of the Core Bus Corridor, and it is coordinating with the relevant authorities to implement appropriate measures for that purpose.

b) Parking Issues

Issues about parking are the responsibility of Dublin City Council and are outside of the remit of the NTA in this Proposed Scheme.

c) Traffic calming measures along Glasnevin Hill

The Proposed Scheme includes extensive traffic management measures along Glasnevin Hill:

- The existing northbound cycle lane on Glasnevin Hill will be upgraded to a segregated cycle track, and a new southbound cycle track will be provided. These cycle tracks will link via the proposed River Tolka cycleway to the segregated cycle route from St. Mobhi Road towards the city centre.

- Pedestrian facilities will be generally improved along Glasnevin Hill with raised table crossings at all side roads and a new pedestrian signal crossing at the shop near the Bon Secours Hospital.
- Several speed ramps will be provided across Glasnevin Hill to slow traffic.

d) Pedestrian Crossings

There is an existing pedestrian signal crossing at No.77 St. Mobhi Road (and not at No.85) which will be retained in the Proposed Scheme.

e) Bus Stop Locations on St. Mobhi Road

The two bus stops at No. 85 St. Mobhi Road can operate safely simultaneously. The existing southbound bus stop is in the bus lane, while the northbound bus stop in the traffic lane will be moved from outside No.75/77 to 50m further south away from the pedestrian crossing for safety reasons. If a northbound vehicle wishes to overtake a stopped bus, they can do so if the opposing southbound traffic lane is clear, as they do at present.

f) Bus Gate Operation Times

The Bus Gate operation times will be monitored continuously to ensure that the required bus priority is being achieved, especially near the start and end times. The proposed hours of operation have been carefully selected to minimise local disruption and following assessment of the interactions with local schools and sports clubs in the afternoon and evening. The limited hours of operation of the Bus Gate should achieve an appropriate balance between the need for public transport reliability and journey time, while limiting the inconvenience for the local community.

2.2.6.17 Griffith Avenue and District Residents Association GADRA

Summary of issues raised

a) Request for no change until Metrolink is operational. Metrolink should be prioritised over BusConnects.

b) Concerns about traffic diversions due Bus Gate (responded to earlier in Section 2.2.3 of this report).

a) Unsure about the Griffith Gyratory Rearrangement and request for some examples of similar layouts working.

b) Eastbound traffic restriction at St. Mobhi Drive not considered in EIAR.

c) Objection to Old Ballymun Road closure until assessed in EIAR.

d) Narrow footpath width on St. Mobhi Road (responded to earlier in Section 2.2.5 of this report).

e) Concerns about Island bus stops (responded to earlier in Section 2.2.6.10 of this report)

f) Request for a common EIAR Metrolink – BusConnects, considering the impacts of both schemes combined.

g) Objection to the removal of mature trees at Na Fianna, arguing the benefit of the Cycle track is not enough for this impact.

h) Concerns about the increase of HGV traffic, stated in the EIAR.

i) Request for the implementation of the cycle route along Walsh Road, instead of the route along St. Mobhi Road.

j) Impact of the Bin day for available footpath space.

k) Shortcomings in the public consultation process.

Responses to issues raised

a) Metrolink and BusConnects

The separately proposed BusConnects and Metrolink schemes will be highly complementary and are both necessary. Metrolink will serve a much longer route than the Ballymun Core Bus Corridor extending from Swords to Dublin Airport and onwards to the southern side of the city centre. It will be a higher speed service with stations at wide spacings of typically 1.5km, which is 4 times the spacing of bus stops along the core bus corridor. It will suit people on longer journeys, but it will have a less accessible catchment area than the parallel bus service due to the greater distance between stations. The bus service will fill in the gaps in the catchment area, especially for people who cannot walk far, and these people can then transfer onto the metro if they wish. The bus corridor will also carry a wide variety of bus routes that will branch out the areas beyond the catchment of the Metrolink.

Further is included in EIAR Chapter 3, Section 3.2.5. in relation to MetroLink as a possible reasonable alternative:

> *"Arising from the various studies and analysis that had been carried out, and the specific assessment and transport modelling work undertaken for the GDA Transport Strategy (NTA 2016), it was concluded that a high quality bus-based transport system supplemented by the implementation of MetroLink, would be part of the proposed public transport solution in the corridor of the Proposed Scheme, as the development of an underground metro would not remove the need for additional infrastructure to serve the residual bus needs of the area covered by the Proposed Scheme, nor would it obviate the need to develop the cycling infrastructure required along the route of the Proposed Scheme."*

b) Traffic diversions due to Bus Gate: this was responded to earlier in Section 2.2.3 of this report.

c) Griffith Avenue Gyratory

The proposed changes at the Griffith Avenue Gyratory simply reinstates two-way traffic on two of the three sides of the triangle and removes some of the existing complexity that sends some traffic the long way around the triangle and overloads the eastern side. There are no directly comparable arrangements elsewhere in Dublin as this is a unique situation.

The revised traffic movements at the Griffith Avenue junction will operate as follows:

a) Southbound traffic on St. Mobhi Road will continue to be allowed to turn right onto Griffith Avenue westbound where the existing right-turn lane will be retained as shown in Figure 3-3.
b) Traffic from the west and north headed eastbound traffic on Griffith Avenue currently shares a single traffic lane on St. Mobhi Road to turn left at the south-eastern corner of the gyratory. That traffic will in future share a single eastbound traffic lane on the southern side of the gyratory, which will have similar capacity.
c) There will be a traffic signal for the right hand turn at the northern end of the junction for traffic wanting to travel eastwards on Griffith Avenue – shown as a set of red dashed arrows on Figure 3-3.
d) Traffic travelling east on Griffith Avenue will access St. Mobhi Road by following the existing route, by turning left initially north onto Ballymun Road, and then right south onto St. Mobhi Road. The signals at the northern end of the gyratory will be managed to allow this movement to be completed without a stop at the northern junction so as to avoid a queue blocking the northbound through lane.

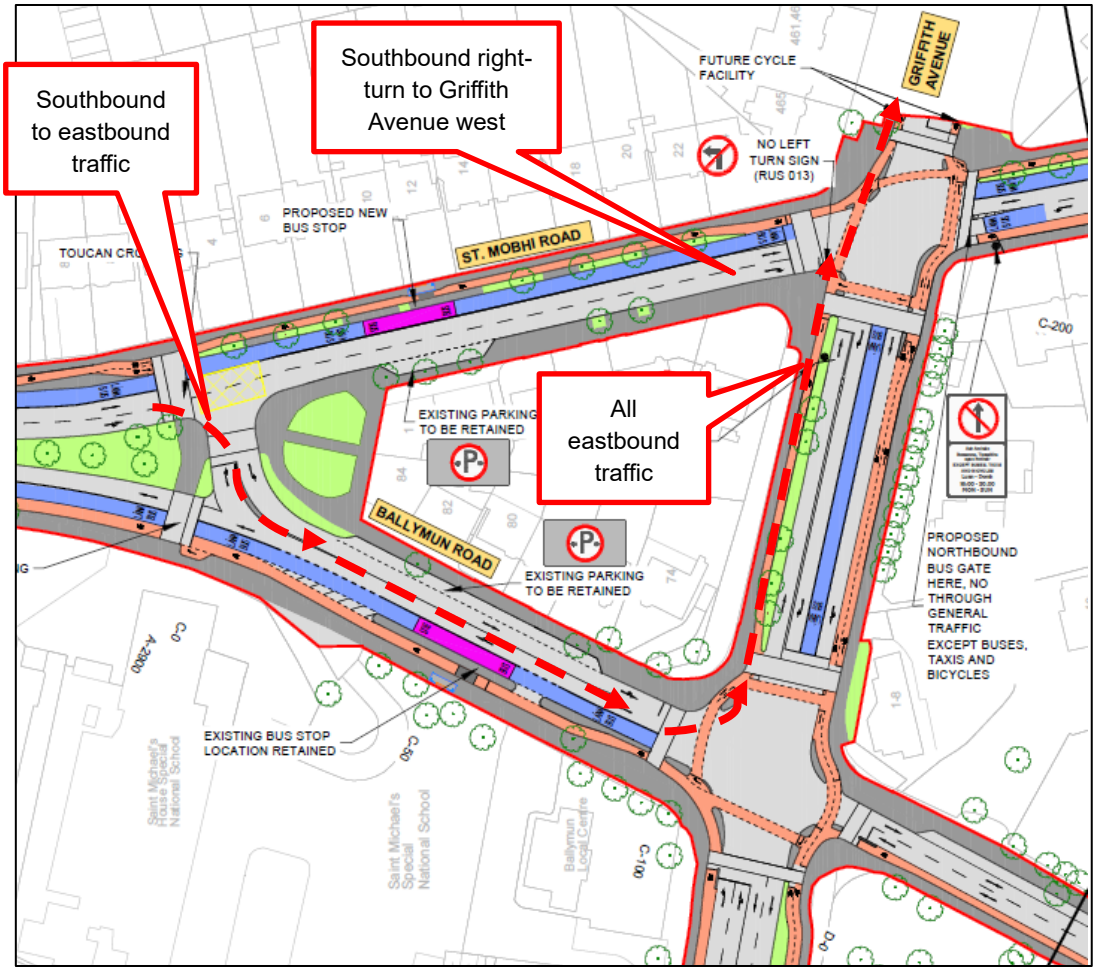


Figure 3-3: Traffic Movements at the Griffith Avenue Junction

d) Eastbound traffic restriction at St. Mobhi Drive

There is a simple explanation provided in Section 4.5.2.1 of Chapter 4 (Proposed Scheme Description) in Volume 2 of the EIAR as to why it is proposed to restrict eastbound traffic at the junction of St. Mobhi Road, which is "*to reduce traffic flows along this narrow residential street*". There is an unusually high volume of eastbound traffic on this minor road which appears to use this route instead of Botanic Avenue towards Drumcondra. The width of the road is restricted due to parking along the southern side, which obstructs two-way traffic flows leading to cars occasionally mounting the footpath on the northern side causing a safety concern on a busy pedestrian route near the schools on St. Mobhi Road. It was decided for pedestrian safety reasons to restrict some through traffic on this road. This proposal was indicated on Map 9 in the information brochures for the Preferred Route Option public consultations in March 2020, and again in November 2020. EIAR Chapter 6 assesses the overall traffic impacts of the Proposed Scheme based on adjustments to the road network, which included the restriction of eastbound traffic at the eastern end of St. Mobhi Drive.

e) Old Ballymun Road closure to Northbound traffic

This was responded to earlier in Section 2.2.4 of this report. EIAR Chapter 6 assesses the overall traffic impacts of the Proposed Scheme based on adjustments to the road network, which included the restriction of northbound traffic on Ballymun Road between Church Avenue and Claremont Avenue.

f) Narrow footpath width on St. Mobhi Road

This was responded to earlier in Section 2.2.5 of this report.

g) Island bus stops

This was responded to earlier in Section 2.2.6.10 of this report.

h) Metrolink & BusConnects schemes combined.

These combined impacts are addressed extensively in Chapter 21 (Cumulative Impacts & Environmental Interactions) in Volume 2 of the EIAR. There are many relevant headings, and the full chapter should be read to gain a proper appreciation of the synergies between the two schemes as parts of the integrated public transport network for Dublin. Metrolink will have only limited impacts on the surface at proposed stations where the designs of the two schemes have been developed to be complementary.

i) Objection to the removal of mature trees at Na Fianna, arguing the benefit of the Cycle track is not enough for this impact.

The removal of the trees is required for footpath and cycle track widening as an improvement to the existing narrow footpath along the eastern side of St. Mobhi Road in front of Na Fianna and Home Farm due to the large numbers of pedestrians that walk to and from the River Tolka corridor to the south from where there are links to a wide catchment area to the east and west, as illustrated clearly in the photograph in Figure 2-2-17.

Figure 2-2-17: Heavy Pedestrian Traffic on St. Mobhi Road towards the River Tolka

j) Increased HGV traffic

Chapter 6 (Traffic & Transport) in Volume 2 of the EIAR discusses this issue and describes how commercial traffic will continue to grow in future as the city population increases. Clearly this proposed public transport scheme will not cater for that separate travel demand. The higher future proportion of HGV traffic is also due to reduction in other traffic as people switch mode onto public transport, cycling and walking.

k) Request for Cycle Route along Walsh Road instead of St. Mobhi Road

The GDA Cycle Network Plan includes two parallel cycle routes in this area:

- Primary cycle route 3A along St. Mobhi Road, and
- Secondary cycle route 3C along Walsh Road

Figure 2-2-18: GDA Cycle Network Plan Map for Glasnevin / Drumcondra Area

It is not a question of either/or one of these two routes as they both serve distinct catchment areas. In terms of network importance, Route 3A on St. Mobhi Road is at a higher level than Route 3C on Walsh Road which is a less direct route through quiet residential streets rather than along a main road.

l) Bin day on footpaths

The design standards for footpath widths includes provisions for some localised restrictions within the overall width for permanent features such as lamp posts, and for occasional items such as bins put out for collection. A standard wheelie bin is 55cm wide, which when placed on a 1.8m wide footpath leaves a space of 1.25m for pedestrians. This is sufficient for all footpath users to get past the bin.

2.2.6.18 *Ann Moynihan - Cycle Track and Bus Stop at Shops at Southern end of St. Mobhi Road*

Description of Proposed Scheme at this Location

There is an existing bus stop in front of the row of shops at No.163a to 168 St. Mobhi Road (on the western side at the southern end at the junction with Botanic Road as shown in Figure 2-2-19 an extract of the EIAR Volume 3 Chapter 4 Proposed Scheme Description Appendix the General Arrangement drawing Sheet 11. An aerial view of this location is shown in Figure 2-2-20 and street views in Figures 2-2-21 and 22.

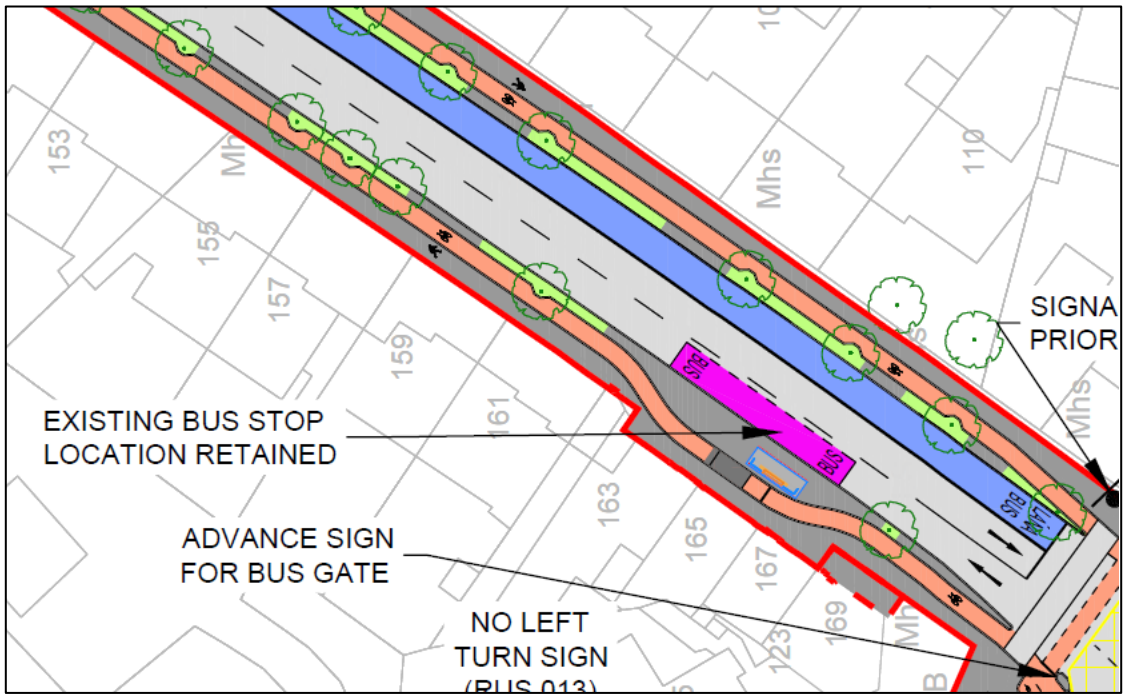


Figure 2-2-19: Extract from General Arrangement Map Sheet 11

Figure 2-2-20: Aerial View of the Location

Figure 2-2-21: Street View of the Location

Figure 2-2-22: Existing Bus Stop in front of No.165/167 St. Mobhi Road

There is a 1.5m wide layby provided for buses to pull in partially off the road as shown in Figure 2-2-22. The existing bus stop shelter sits on a 3m wide concrete apron and behind that the private landing area in front of the shops is 2.7m wide, giving a total width of 7.2m from the road edge to the front of the building.

In the Proposed Scheme, the bus layby will be removed, and the 3m wide bus stop island and shelter will move forward by 1.5m closer to the road. A cycle track will be provided behind the bus shelter in accordance with the standard detail included in the *Preliminary Design Guidance Booklet for BusConnects* (included in EIAR Volume 4, Appendix A4.1) as shown in Figure 2-2-23.

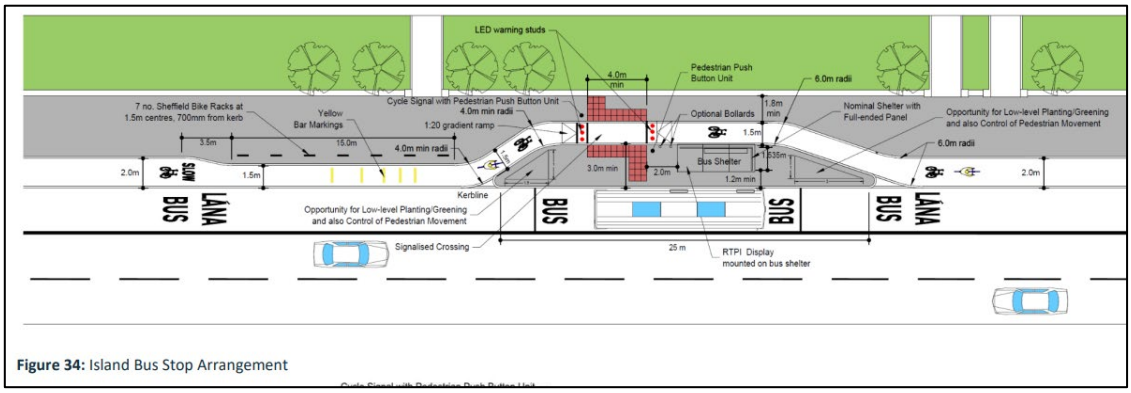


Figure 2-2-23: Standard Detail for Island Bus Stop

On St. Mobhi Road generally the proposed cycle tracks will be narrower than usual at 1.25m wide to fit behind the trees, and therefore in this case the arrangement at the bus stop will also have a 1.25m wide cycle track, which will deviate a little from the 1.5m shown on the standard detail.

In total the width from the road edge kerb to the rear of the cycle track will be 4.25m, which will leave a distance of 2.95m between the cycle track and the front of the building. The effective width of the footpath behind the bus stop will therefore increase slightly from 2.7m to 2.95m.

Summary of Issues Raised

This submission raised the following issues:

a) The need for a bus shelter and the location of the bus stop.

b) Proximity of the proposed cycle track to the shops.

Objections to the CPO also raised a number of related issues which are included in this report for completeness as follows:

c) Pedestrian safety.

d) Placement of bins.

e) Loading.

f) Disruption during construction.

Responses to Issues Raised

a) Bus Stop Location and Shelter

There is an existing bus stop at this location which serves a large catchment area, and it will remain essential for access to the bus services on the existing bus routes and the proposed Spine E route. A full assessment was undertaken for the bus stops along the route as described in Appendix H of the Preliminary Design Report (Supplementary Information) which sought to optimise bus stop locations and spacing to serve the catchment area along the core bus corridor. This assessment confirmed that Bus Stop No.148 is essential to serve the extensive local catchment area.

Appendix H of the Preliminary Design Report (Supplementary Information) sets out the requirements for Bus Stop Shelters that are provided as standard on all of the core bus corridors as they provide important shelter and comfort for waiting passengers. The new shelter will be located 1.5m further from the building frontage.

b) Proximity of the proposed cycle track to the shops

Island bus stops are proposed generally along the Proposed Scheme to separate cyclists from the boarding and alighting activity at the bus stops for safety reasons, and also to reduce delay for cyclists who will bypass the bus stop zone. In this case the removal of the existing bus layby will allow the proposed cycle track to replace the existing bus shelter which will be moved further out towards the road and away from the building. The effective width of the footpath in front of the shops will actually increase slightly by 0.25m in the Proposed Scheme.

c) Pedestrian Safety

There will be a slight increase in the effective width of the footpath from 2.5m to 2.75m in front of the building and therefore there can be no impact for pedestrian safety and comfort. The cycle track will be clearly segregated from the footpath with a delineation kerb.

d) Placement of Bins

At present bins are placed on the footpath area, and this will remain the case in the Proposed Scheme.

e) Loading

There is no formal loading bay at this location, and the situation will remain effectively the same in the Proposed Scheme.

f) Impact for Access During Construction

The construction works at this location will be short in duration and will take place at a distance of 2.75m from the building frontage. Disruption during the works should be minimal. When roads and streets are being upgraded, there will be some temporary disruption / alterations to access to premises in certain locations along the Proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. As described in paragraph 5.5.3.1 of Chapter 5 of Volume 2 of the EIAR, details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area. The duration of the works will vary from property to property, but access and egress will be maintained at all times.

2.3 Section 3: Prospect Road, Phibsborough Road from Hart's Corner to Western Way

2.3.1 Description of Proposed Scheme at this Location

As set out in Section 4.5.3 of Chapter 4 (Proposed Scheme Description) in Volume 2 of the EIAR, this section will commence at the R108 Prospect Road / Lindsay Road Junction at the southern apex of Hart's Corner and will extend through Phibsborough over a length of 1.2km to the R135 Western Way Junction.

Priority for buses will be provided along the entire length of this section of the Proposed Scheme, with dedicated bus lanes in both directions over most of the length, apart from three short sections, as described later where signal controlled priority for buses will be provided.

A two-way segregated cycle track will be provided along the eastern side of R108 Prospect Road to the Royal Canal, where the cycle route will deviate a short distance eastwards to join the Royal Canal Bank, an infilled former canal branch, bypassing Phibsborough Village. The existing railway bridge on the Connolly railway line to the south of Lindsay Grove will be widened, and two new cycle / pedestrian bridges will be provided:

- One over the Docklands railway line adjacent to Whitworth Road; and
- One over the Royal Canal.

Heading southward from the Royal Canal, the cycle route will largely avail of the existing quiet street along Royal Canal Bank. The cycle route will pass around the eastern side of Phibsborough Library and will then cross underneath R101 North Circular Road, where a new bridge will be provided to enable the north to south cycle route to pass through without the climb and delay of a traffic signal crossing.

Extracts from the General Arrangement Drawings, which are provided in Volume 3 of the EIAR, are included below in Figure 2-3-1 to Figure 2-3-4.

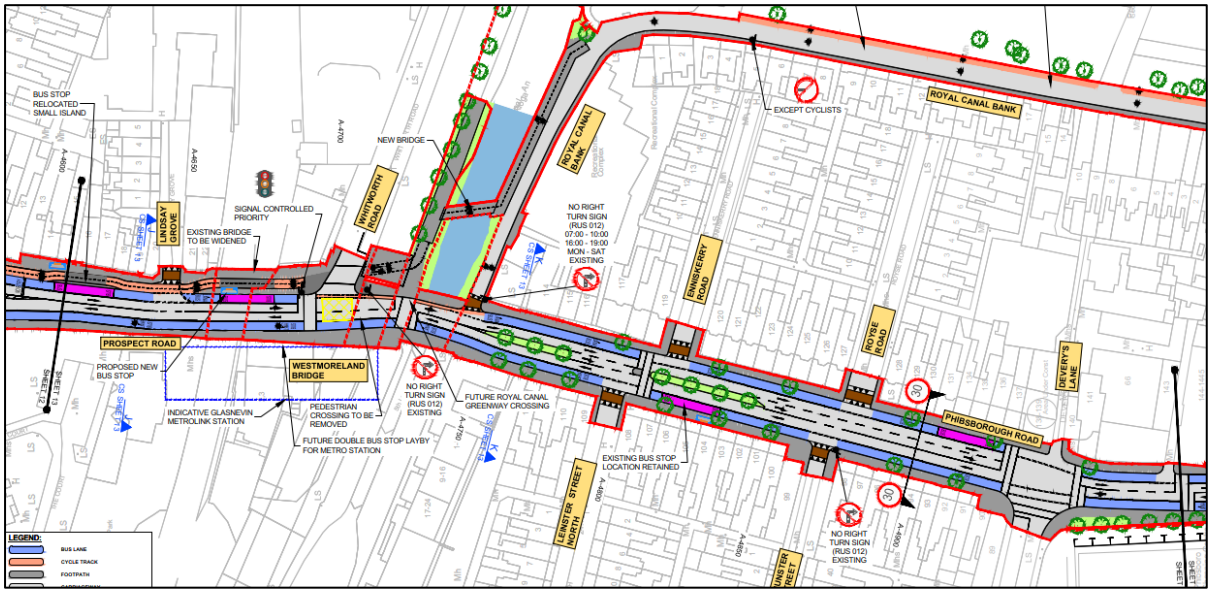


Figure 2-3-1: Extract from General Arrangement Drawing Sheet 13

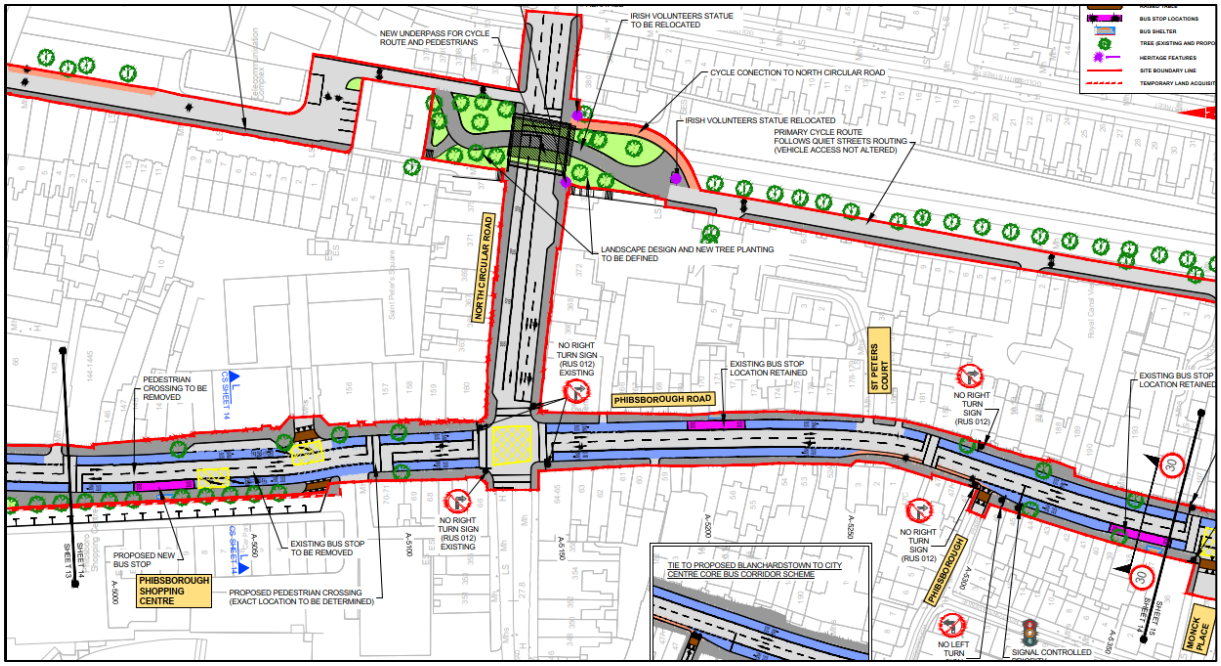


Figure 2-10: Extract from General Arrangement Drawing Sheet 14

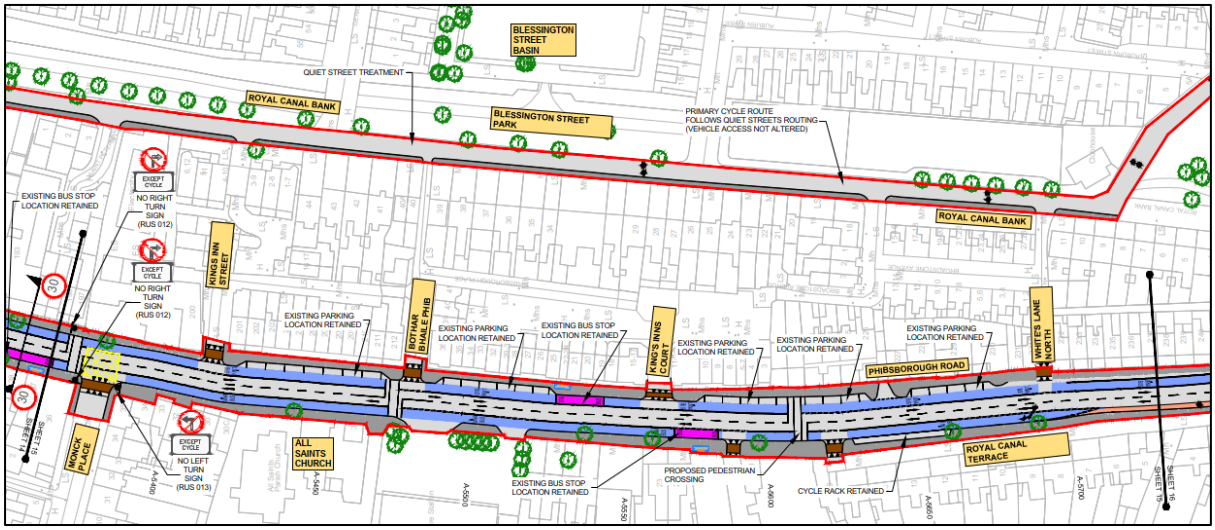


Figure 2-3-3: Extract from General Arrangement Drawing Sheet 15

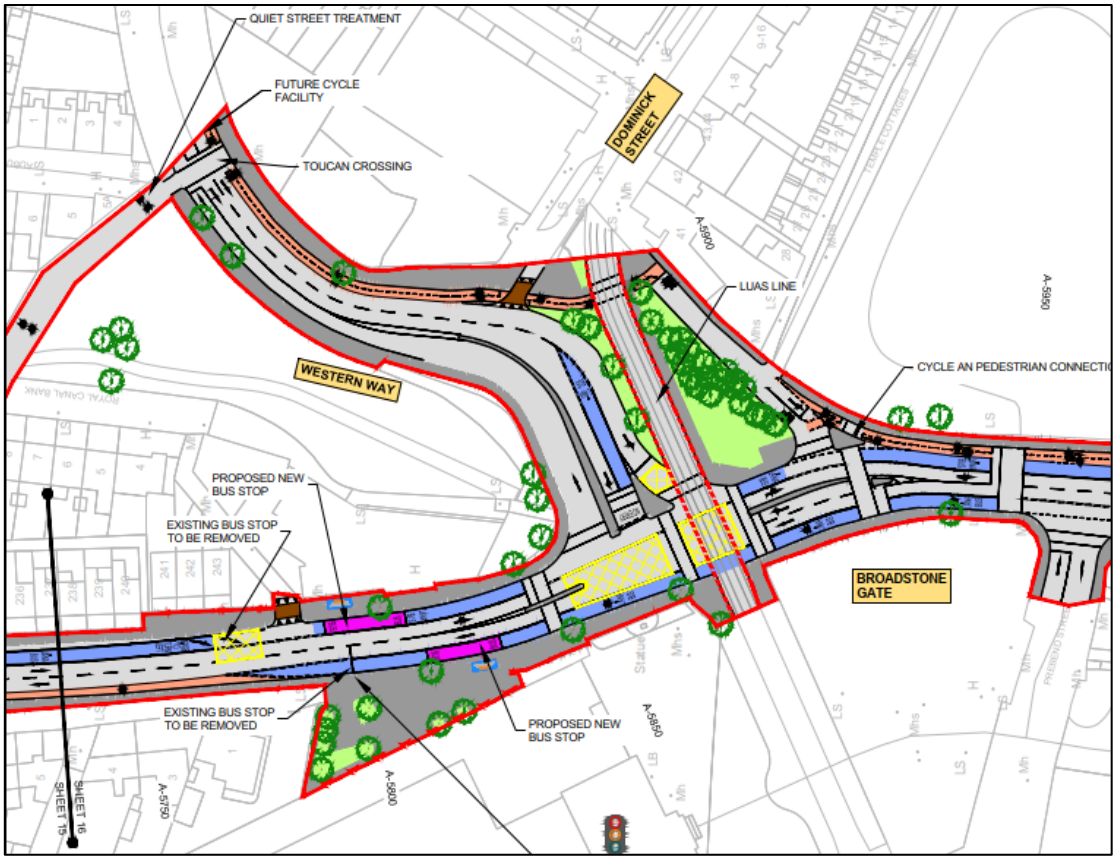


Figure 2-3-4: Extract from General Arrangement Drawing Sheet 16

2.3.2 Overview of Submissions Received

Table 2.3 below lists the submissions made in respect of the Proposed Scheme in Section 3.

Table 2.3: Submissions Made in Respect of Section 3

No	Name	No	Name	No	Name
07	Beyond the Junction	22	Dublin Cycling Campaign	50	Neasa Hourigan TD
10	Cabra Park Residents Association	31	Inland fisheries Ireland	64	St. Vincent's Basketball Club
20	Department of Housing Development Applications Unit	45	Senator Marie Sherlock	65	Tesco
21	Dublin Commuter Coalition	48	Senator Mary Fitzpatrick		

2.3.3 Common Issues Raised

2.3.3.1 Provisions for Cyclists & Air Quality in Phibsborough

Summary of issue

This issue was raised in the following submissions:

- Beyond the Junction
- Cabra Park Residents Association
- Dublin Commuter Coalition

- Dublin Cycling Campaign
- Senator Marie Sherlock, Councillor Declan Meenagh, Brendan O'Rourke & Christina Casey
- Senator Mary Fitzpatrick
- Neasa Hourigan TD
- St. Vincent's Basketball Club

The submissions raised the following issues:

- Need for improved cycling facilities
- Objection to the absence of cycle tracks along Phibsborough Road
- Request for the extension of the 30 km/h speed limit zone
- Concerns about air quality on Phibsborough Road
- Connectivity for cyclists to the areas west of Phibsborough

Responses to issues

Need for Improved Cycling Facilities

The four submissions all welcome the Proposed Scheme in broad terms for the various proposed improvements for cycling facilities, but they have reservations about the proposals through Phibsborough.

Cycle Route through Phibsborough

The constraint of the limited road width along Phibsborough Road is addressed in Section 3.3.3 (on Page 27) of Chapter 3 (Consideration of Reasonable Alternatives) in Volume 2 of the EIAR, and in the Preferred Route Option Report in the Supplementary Information, summarised as follows:

> *"Through Phibsborough, along R108 Phibsborough Road over a length of 1.1km from the Royal Canal to R135 Western Way, the street is too narrow to accommodate both bus lanes and cycle tracks. The option of a three-lane layout with discontinuous bus lanes and bus priority signal control was considered, but this would have introduced greater risk for reliable bus operations. Instead, there is a suitable parallel cycle route, just 100m to the east of R108 Phibsborough Road, along Royal Canal Bank which will cater for the majority of cyclists along the corridor. It will link towards the City Centre via Geraldine Street and Blessington Street, or via R135 Western Way to Bolton Street. For local cycle trips it will be necessary to share the bus lanes through Phibsborough in a suitably low-speed 30km/h (kilometres per hour) environment."*

Cyclists can use the bus lanes through Phibsborough, where a 30 km/h speed limit will apply. Where there are short gaps in the bus lanes at particularly narrow sections of the streets, linking cycle tracks are provided so that cyclists will have a continuous facility that does not require use of the general traffic lane at any point. This arrangement is the best that can be achieved, and it provides a reasonable balance overall with two alternative routes available for cyclists through Phibsborough.

The GDA Cycle Network Plan anticipated the challenges in Phibsborough and did not indicate Primary Route 3 along Phibsborough Road as described by the submission by the Dublin Commuter Coalition. As shown in Figure 2-3-5 Route 3 is clearly indicated along Royal Canal Bank, with no cycle route along Phibsborough Road.

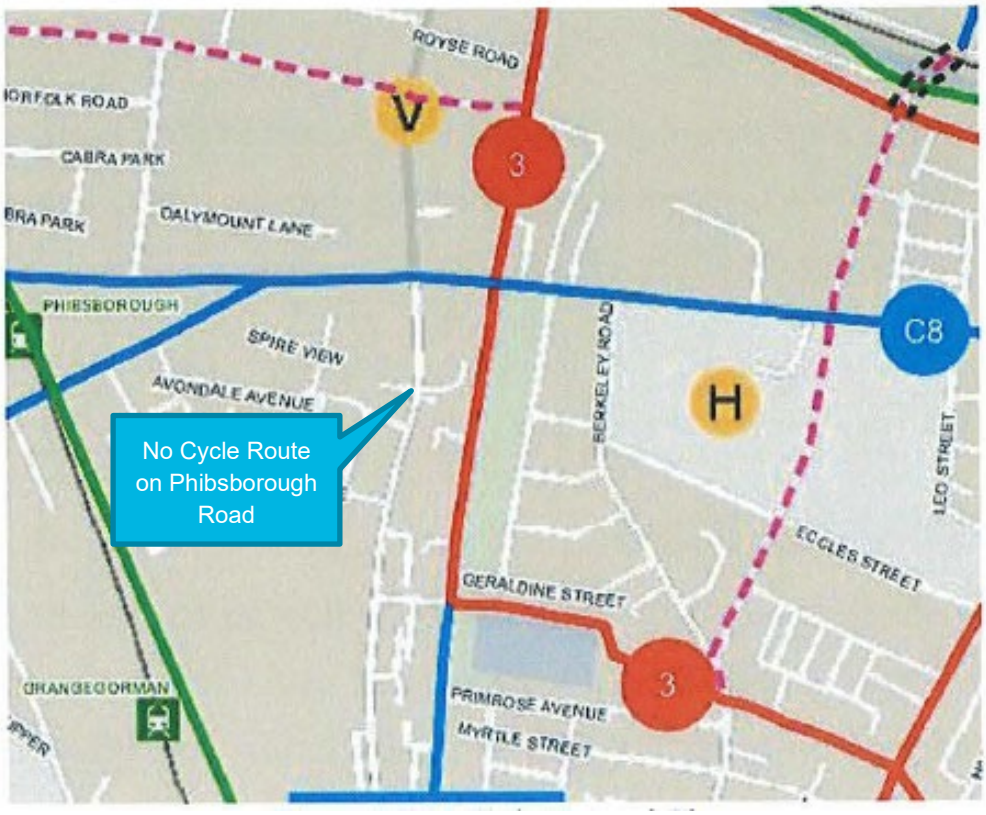


Figure 2-3-5: Extract of GDA Cycle Network Plan at Phibsborough

30 km/h speed limit in Phibsborough

The submissions query the extents of the proposed 30 km/h speed limit along Phibsborough Road. The proposed lower speed limit will apply to the urban village centre along Phibsborough Road from Connaught Street at the northern end to Monck Place at the southern end, which is where the businesses and services are concentrated. This follows the guidance in the *Design Manual for Urban Roads and Streets* (Table 4.1) which indicates a speed of 30-40 km/h on arterial routes in the "Centre" context, but 40-50 km/h elsewhere which applies on Phibsborough Road outside of the village centre zone. It would therefore not be appropriate to extend the 30 km/h speed limit beyond the extents shown in the Proposed Scheme.

The submissions welcome the proposal for the *Royal Canal Bank* quiet streets cycle route but note the absence of specific traffic calming measures and observe that some through traffic passes through this residential area to link between North Circular Road and Phibsborough Road. The existing streets along the proposed cycle route are very narrow with on-street parking and very limited traffic movements due to the largely local access only nature of the area. It is possible for traffic to follow a very convoluted route through the area from North Circular Road by turning left onto Berkely Road, right into Geraldine Street, left onto Royal Canal Bank, right into White Lane, and then left onto Phibsborough Road. This route is longer than the simple left turn from North Circular Road at Doyle's Corner, involving 5 separate turns at junctions, and passes along sections of street that are only wide enough for single-file traffic and where delay would occur in the event of meeting an oncoming vehicle. As a result very little traffic may be observed taking this "long-cut" route. In the development of the Proposed Scheme there was no need identified for relevant traffic calming measures along the proposed cycle route through this quiet residential area.

Air Quality On Phibsborough Road

The submissions raise the issue of poor air quality on the bus corridor which would affect cyclists sharing the bus lanes. This concern would apply across the whole of the Proposed Scheme whether cyclists are in the bus lane, or on a cycle track beside it.

Chapter 7 (Air Quality) in Volume 2 of the EIAR considered the potential air quality impacts associated with the Operational Phase of the Proposed Scheme. The assessment determined that the Operational Phase of the Proposed Scheme will generally have a neutral impact on air quality, and as a result no mitigation or monitoring measures are required. Whilst not a mitigation measure as such, it is noted that

in time, vehicle emissions technology will improve, and the Irish vehicle fleet will continue to evolve to the extent that vehicle emission impacts associated with the Proposed Scheme are anticipated to decrease. City wide traffic management measures and proactive encouragement of low emissions vehicle uptake will accelerate these improvements. In addition, ongoing improvements in technology has been reducing emissions from the bus fleet, which will eventually be removed entirely when the fleet is electrified in due course.

Submission: Senator Marie Sherlock's submission raised concerns about the use of diffusion tube data during the 2020 COVID-19 lockdowns.

Response: Regarding the utilisation of diffusion tube data from during the 2020 lockdowns, Section 7.3.2.2 of Chapter 7 (Air Quality) in Volume 2 of the EIAR describes the period of data collection and the impact of COVID-19. Diffusion tube data was collected over a seven month period (15 November 2019 to 8 June 2020), however due to COVID-19 impacts on the baseline traffic environment, the final two data sets (16 March 2020 to 8 June 2020) are considered non 'typical' baseline data (full lockdown was implemented on 27 March 2020), and therefore, are not included in the baseline data set. It is noted that schools, childcare facilities and cultural institutions were closed from 12 March 2020 onwards. Vehicle emissions associated with school and childcare facilities were expected to influence NO_2 (nitrogen dioxide) concentrations on 12 (Thursday) and 13 (Friday) March 2020, however, are likely to have had less impact on 14 (Saturday) and 15 (Sunday) March 2020. This results in two days of reduced NO_2 concentrations, which are unlikely to have had a significant impact on the average NO_2 concentration of the 31 day sample taken from 15 February to 16 March 2020. The study also utilises EPA diffusion data from 2018 to 2019, in part, as 2020 to 2021 is also considered non 'typical' baseline data.

Submission: Senator Marie Sherlock's submission raised concerns that there will be no improvement in air quality in some areas until 2043.

Response: Regarding projected improvements not seen until 2043, this is a result of the assessment approach, where it is standard procedure to assess specific years, namely the opening and design years of a proposed development / scheme. Emissions due to fleet improvements will reduce gradually between 2028 (Opening Year) and 2043 (Design Year), with improvements in air quality for Ballymun / Finglas likely to occur before 2043. Though there are uncertainties associated with the rate of emissions reductions, they are nonetheless likely as the Government of Ireland has recently committed as part of the 2023 Climate Action Plan that one in three cars will be electric by 2030.

Submission: Senator Marie Sherlock and the Beyond the Junction submissions raised the issue that outdated World Health Organization (WHO) Guidelines were used for the air quality assessment.

Response: The publication of the new WHO guidelines in 2021 is acknowledged, however these do not alter the impact assessment. A briefing note by the European Parliamentary Research Service "Revision of the EU Ambient Air Quality Directives" for the European Parliament describes the difference between the European Union (EU) air quality standards and the WHO air quality guidelines – *"the air quality reference values for a number of pollutants, defined by the WHO, are intended as policy guidance only, while the EU standards, as defined by the AAQDs, are mandatory."*

The air quality impacts of the Proposed Scheme have been assessed for compliance with the mandatory limit values outlined in the Air Quality Regulations, which incorporate the EU Directive 2008/50/EC of the European Parliament and of the Council of 21 May 2008 on ambient air quality and cleaner air for Europe (CAFE Directive), in line with the air quality guidance methodologies described in Section 7.2.4 of Chapter 7 (Air Quality) in Volume 2 of the EIAR. The updated WHO air quality guidelines therefore do not alter the air quality impacts presented in Chapter 7 (Air Quality).

Submission: The Beyond the Junction submission raised concerns about particulate matter (PM)

Response: Regarding PM assessment, the United Kingdom's Department for Environment, Food & Rural Affairs (DEFRA) emissions factor toolkit (EFT, v10.1) was used to calculate PM emissions for the assessment. The EFT calculates emissions which take into account vehicle exhaust, brake wear, tyre wear and road abrasion for both PM_{10} and $PM_{2.5}$, with non-road emissions ranging from 75% to 91% for PM_{10} and 62% to 84% for $PM_{2.5}$ for the Proposed Scheme study area. The assessment of air quality impacts due to PM therefore includes both exhaust and non-exhaust emissions. Regarding quantification of emissions associated with electric vehicles, a proportion of electric vehicles in the fleet has been included in the assessment of both the 2028 and 2043 emissions (see Table 7.5 in Chapter 7 (Air Quality) in Volume 2 of the EIAR).

Concern has been expressed, citing the 2022 Guardian article 'Car tyres produce vastly more particle pollution than exhausts, tests show', that electric vehicles will produce more non-exhaust emissions, due to their higher weight compared to fossil-fuelled vehicles. The article however also notes that electric vehicles "*are becoming lighter very fast*" and that "*by 2024-25 we expect BEVs and [fossil-fuelled] city cars will have comparable weights*".

Connectivity For Cyclists To The Areas West Of Phibsborough

Links to the west for cyclists are available from the proposed Royal Canal Way Cycle route via Kelly's Lane that connects to Phibsborough Road and then into Monck Place for example, as well as along North Circular Road where cycle tracks are to be developed in accordance with the GDA Cycle Network Plan outside of the scope of the Proposed Scheme.

2.4 Section 4: Constitution Hill & Church Street

2.4.1 Description of Proposed Scheme at this Location

As set out in Section 4.5.4 of Chapter 4 (Proposed Scheme Description) in Volume 2 of the EIAR, Section 4 of the Proposed Scheme will commence at the R135 Western Way Junction and will extend along R108 Constitution Hill and R132 Church Street for 1km southwards to the R148 Arran Quay / Ormond Quay Junction at the River Liffey, which will be the end of the Proposed Scheme. Priority for buses will be provided with dedicated bus lanes over most of this section, with three short gaps where Signal Controlled Priority will be provided instead 3 locations on Church Street Lower.

Extracts from the General Arrangement Drawings, which are provided in Volume 3 of the EIAR, are included below in Figures 2-4-1 to 2-4-4.

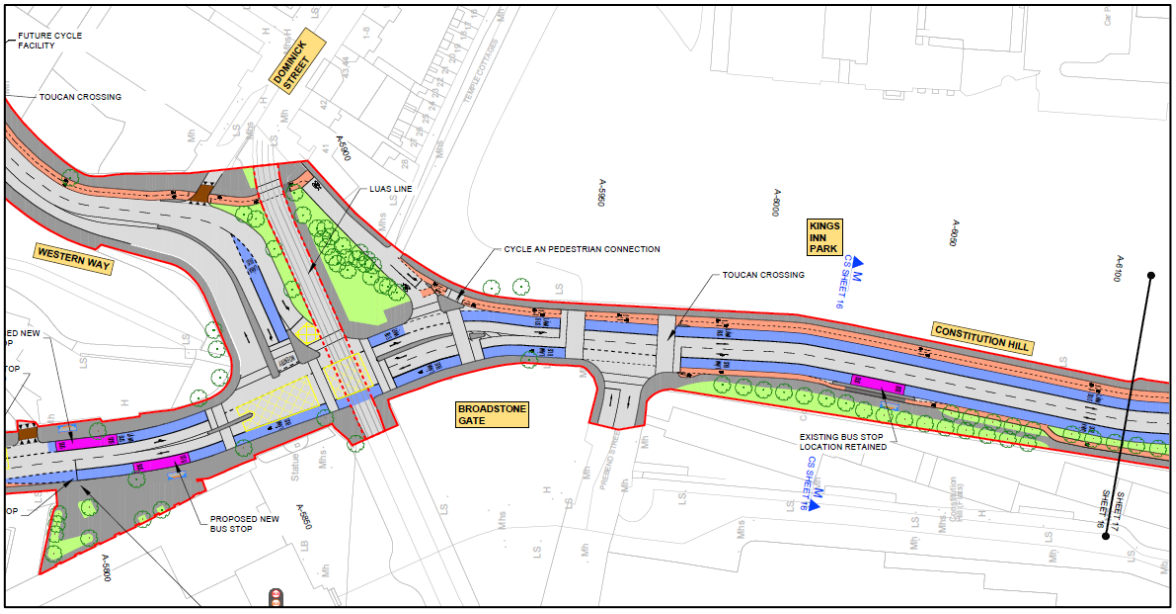


Figure 2-4-1: Extract from General Arrangement Drawing Sheet 16

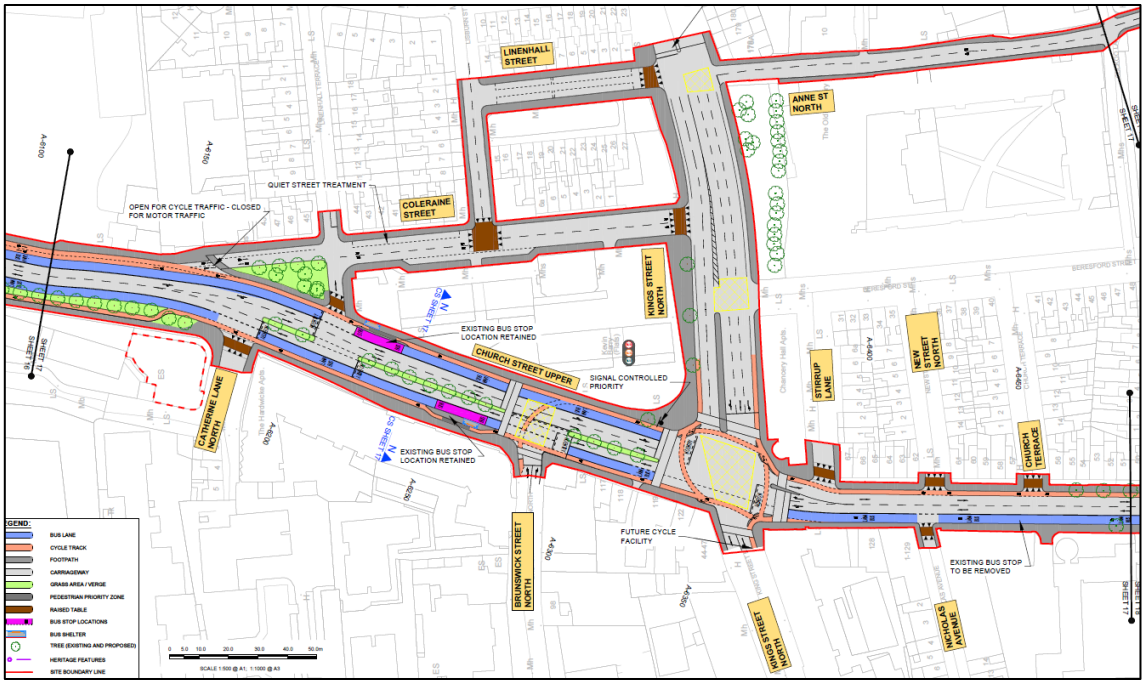


Figure 2-4-2: Extract from General Arrangement Drawing Sheet 17

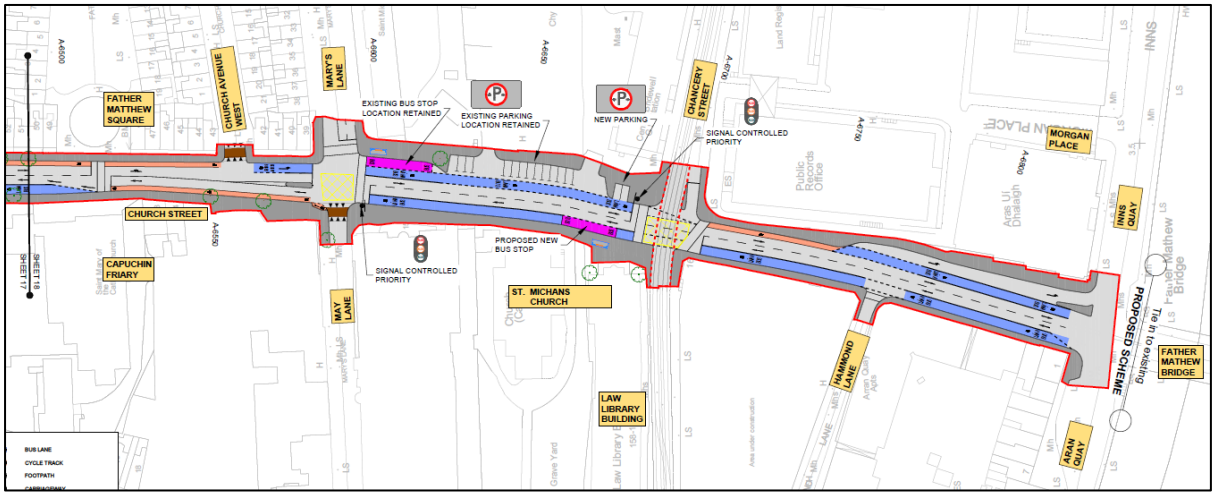


Figure 2-4-3: Extract from General Arrangement Drawing Sheet 18

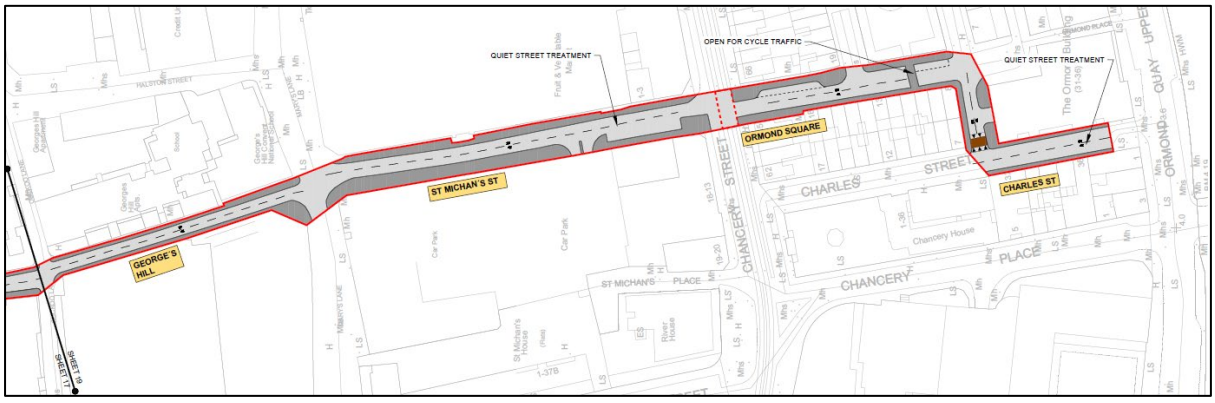


Figure 2-4-4: Extract from General Arrangement Drawing Sheet 19

2.4.2 Submissions Received

There was just one submission in relation to Section 4 of the Proposed Scheme from Brendan Heneghan.

Summary of issue

The submission raised the following issues:

a) Need for bus lanes on Church Street.

b) Preference for cycle lanes on Church Street.

c) Traffic diverted from Capel Street.

Responses to issues

a) Need for bus lanes on Church Street

Although the main bus service on Spine Route E does not extend along the proposed bus corridor south of Western Way, there are existing bus services along Church Street (No.83) and future bus routes 23 and 24 which cross the city from Dublin Airport and link through various communities that do not have the advantage of being on a core bus corridor. Where possible on busy streets it is desirable to provide priority for such ancillary bus services which are an important part of the overall bus network. These bus routes extend the reach of the public transport system to parts of the community that can then interchange with the spine services for broad connectivity across the city for a wide range of trips. Reliability and journey time are equally important on these bus routes, which is why the Proposed Scheme includes sections of bus lane and signal-controlled priority along Church Street.

b) Preference for cycle lanes on Church Street

Cyclists can use either the bus lanes on Church Street, or the parallel quiet streets route through the Markets Area, so they are well provided for in this section of the Proposed Scheme. The GDA Cycle Network Plan proposed Cross-City Cycle Route C5 through the Markets Area to the east of Church Street, and this is included in the Proposed Scheme. In addition a combination mainly of sections of bus lanes with linking cycle tracks will provide an additional option for those cyclist who prefer to travel along Church Street.

c) Traffic diverted from Capel Street

Tables 6.76 and 6.80 in Chapter 6 (Traffic & Transport) in Volume 2 of the EIAR indicates reductions of over 900 and 600 PCUs per hour in the AM and PM peaks on Church Street in the Do-Something scenario (Opening Year 2028) due to mode shift away from private car travel. In this context some additional traffic can be absorbed due to the recent closure of Capel Street. There were about 300 vehicles per hour on Capel Street, which is a very modest volume that is easily dispersed across the wider city street network. Only some of this traffic would transfer to Church Street, where it will have little impact.

2.5 Sections 5, 6 & 7: Finglas Road from St Margaret's Road to Hart's Corner

2.5.1 Description of Proposed Scheme at this Location

Due to the small number of submissions received along the Finglas Corridor, Sections 5,6 & 7 are grouped together.

Section 5 - Finglas Road from St. Margaret's Road to Wellmount Road

As set out in Section 4.5.5 of Chapter 4 (Proposed Scheme Description) in Volume 2 of the EIAR, this section will commence at the northern end at the junction of R135 Finglas Road with R104 St. Margaret's Road and will extend in a south-eastern direction along the Finglas Bypass dual carriageway over a length of 1.1km to the Wellmount Road Junction on the south-western edge of Finglas Village.

The Finglas Bypass is a segregated dual carriageway road that caters only for vehicular traffic until the grade- separated junction with Mellowes Road on the western side of Finglas Village. There are no existing footpaths or cycle tracks along this northern 0.75km length of Section 5, and pedestrians and cyclists will continue to use the parallel local streets to the east and west of the Finglas Bypass. There are no existing pedestrian facilities at the roundabout junction of R135 Finglas Road and R104 St. Margaret's Road, with a footbridge that spans over the dual carriageway road, 35m south of the roundabout. New bus stops will be provided on the Finglas Bypass dual carriageway, just south of the roundabout, to cater for the proposed F1 route bus services that will bypass Finglas Village. To provide access to these bus stops, new footpaths will be provided around the roundabout, with associated signal pedestrian crossings on all four arms of the junction.

Priority for buses will be provided along the entire length of this section of the Proposed Scheme, with dedicated bus lanes in both directions. There is an existing southbound bus lane over the full length of Section 5, but the existing northbound bus lane ends at the northbound merge ramp from Mellowes Road which is 0.5km south of the northern end of the Proposed Scheme. In the Proposed Scheme, a northbound bus lane will be provided along the full length of this section through conversion of the existing left-hand traffic lane to a bus lane over a length of 0.5km. Bus lanes will also be provided on the southern slip ramps at the Mellowes Road grade-separated junction to cater for proposed bus route F2 that will serve the north-western area of Finglas.

Section 6 – Finglas Road from Wellmount Road to Ballyboggan Road

As set out in Section 4.5.6 of Chapter 4 (Proposed Scheme Description) in Volume 2 of the EIAR, Section 6 of the Proposed Scheme will extend along R135 Finglas Road from the Wellmount Road Junction to the Ballyboggan Road Junction, over a length of 1.6km.

Priority for buses will be provided along the entire length of this section of the Proposed Scheme, with dedicated bus lanes in both directions. Segregated cycle tracks will be provided in both directions along the full length of this section of the Proposed Scheme.

Section 7 – Finglas Road from Ballyboggan Road to Hart's Corner

As set out in Section 4.5.7 of Chapter 4 (Proposed Scheme Description) in Volume 2 of the EIAR, Section 7 of the Proposed Scheme will extend along R135 Finglas Road for a distance of 1.5km to Hart's Corner where it will meet the Ballymun Section of the Proposed Scheme.

Priority for buses will be provided along the entire length of this section of the Proposed Scheme, with dedicated bus lanes in both directions. This will require road widening over a length of 330m in front of Glasnevin Cemetery at St. Vincent's School on the western side and at part of Bengal Terrace on the eastern side.

South of Claremont Lawns, alongside Glasnevin Cemetery, the existing on-street parking will be removed and replaced with a new parking facility with the same number of spaces, which will encroach into the open public space at Claremont Lawns.

Segregated cycle tracks will be provided in both directions along the full length of this section of the Proposed Scheme.

Reaching Hart's Corner, the southbound traffic turns left into Prospect Way, which is the northern side of the one- way triangular gyratory traffic system at Hart's Corner. A two-way cycle track will be provided

along the northern side of Prospect Way to connect to the proposed two-way cycle track along the eastern side of R108 Prospect Road, as described in Section 2 of the Proposed Scheme. This will allow cyclists to circulate around the northern and eastern sides of Hart's Corner, fully segregated from traffic.

Extracts from the General Arrangement Drawings, which are provided in Volume 3 of the EIAR, are included below in Figure 2-5-1 to Figure 2-5-13.

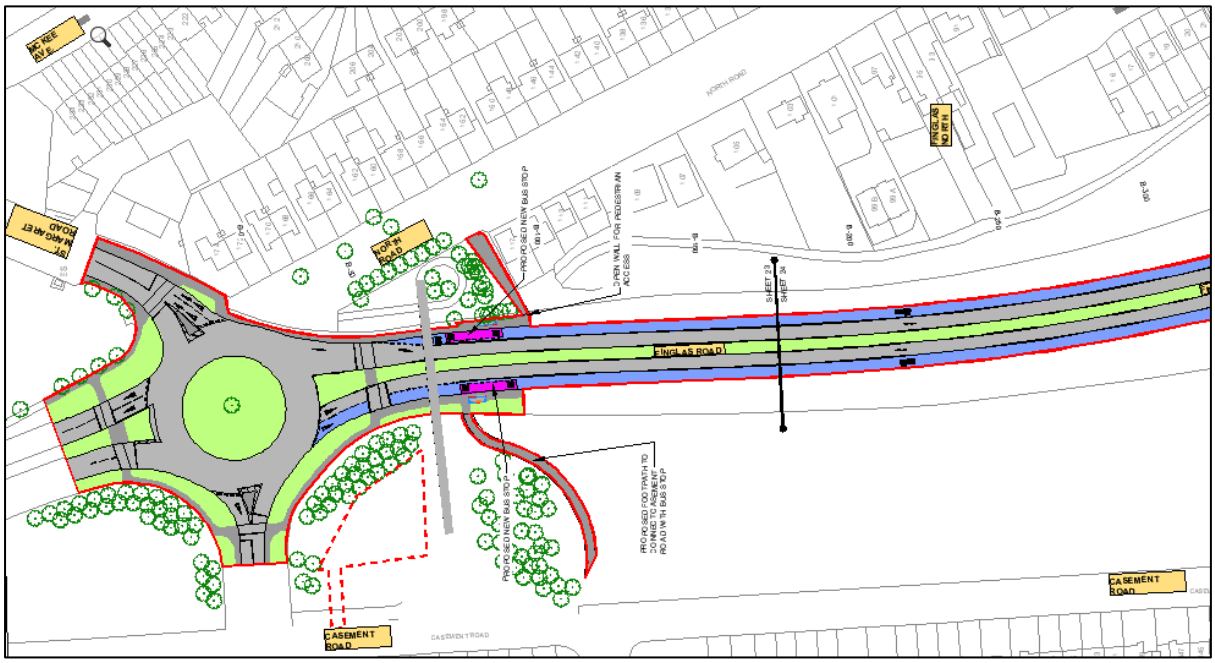


Figure 2-5-1: Extract from General Arrangement Drawing Sheet 23

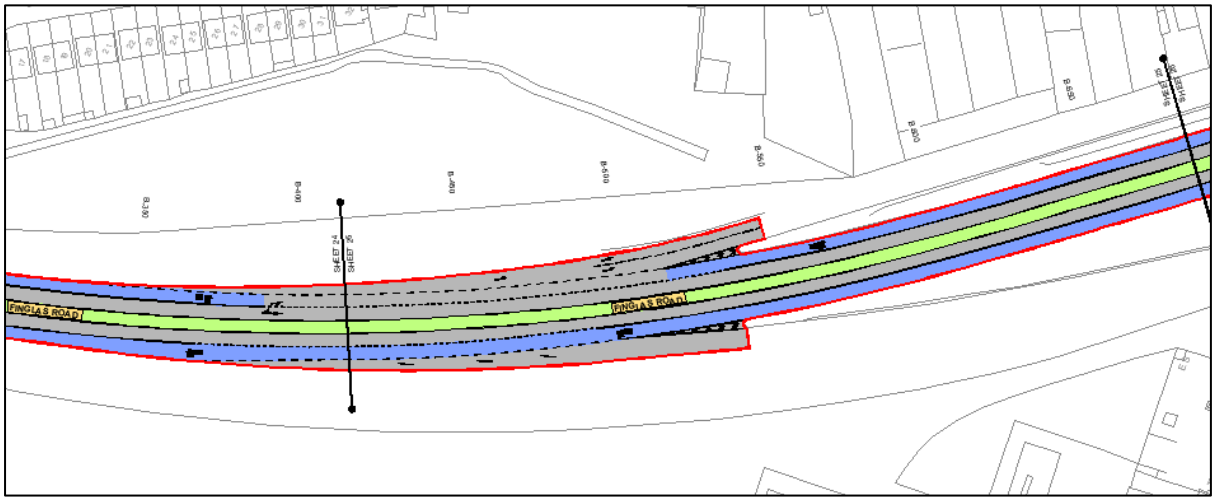


Figure 2-5-2: Extract from General Arrangement Drawing Sheet 24

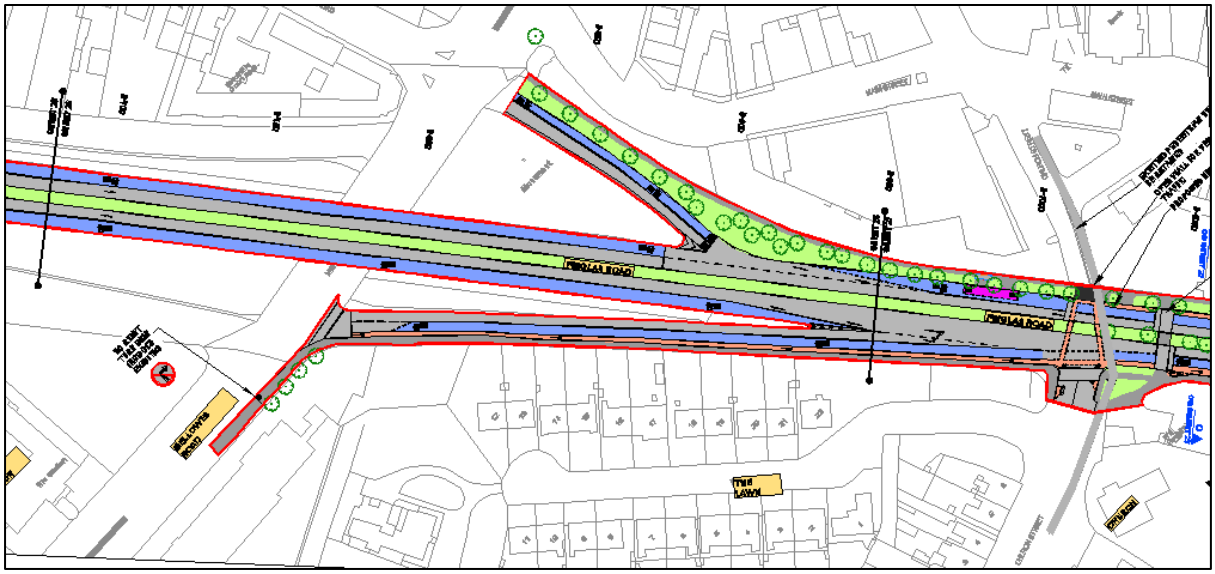


Figure 2-5-3: Extract from General Arrangement Drawing Sheet 25

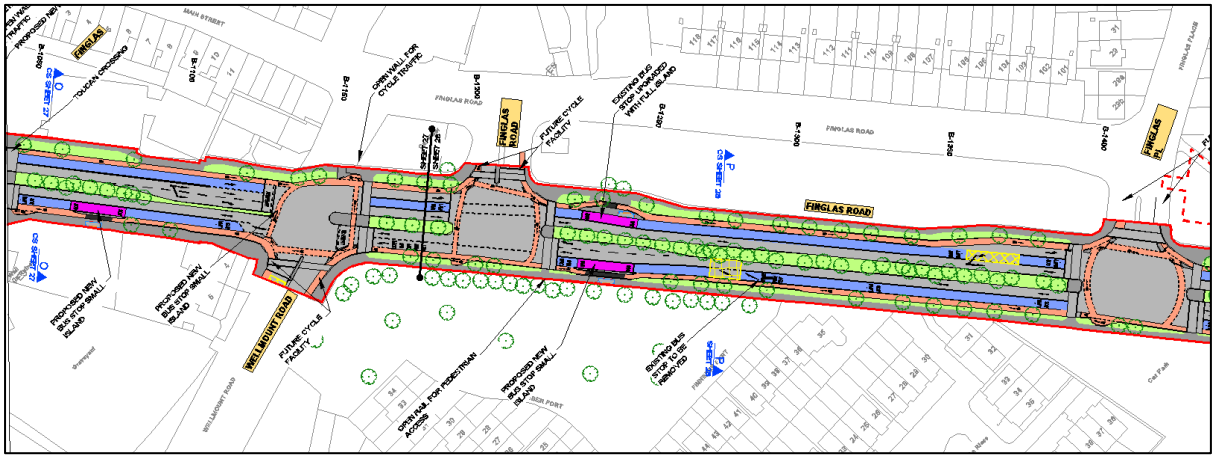


Figure 2-5-4: Extract from General Arrangement Drawing Sheet 26

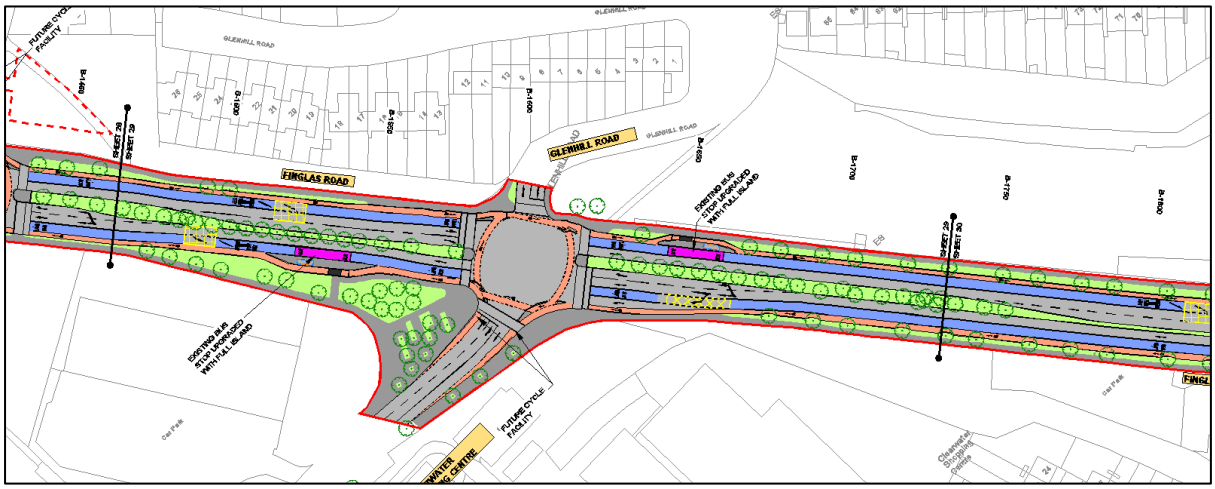


Figure 2-5-5: Extract from General Arrangement Drawing Sheet 27

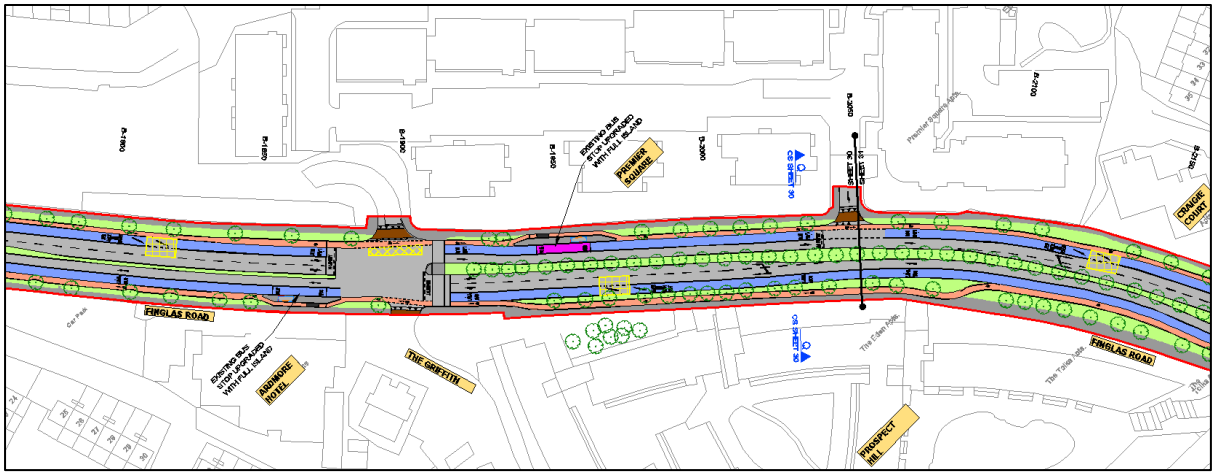


Figure 2-5-6: Extract from General Arrangement Drawing Sheet 28

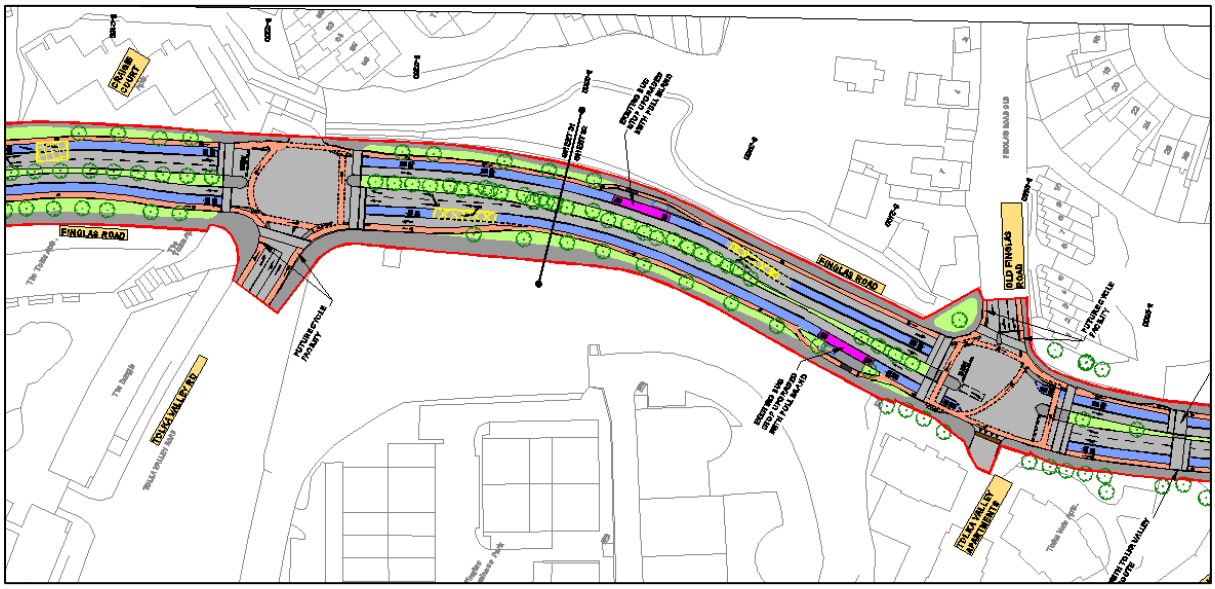


Figure 2-5-7: Extract from General Arrangement Drawing Sheet 29

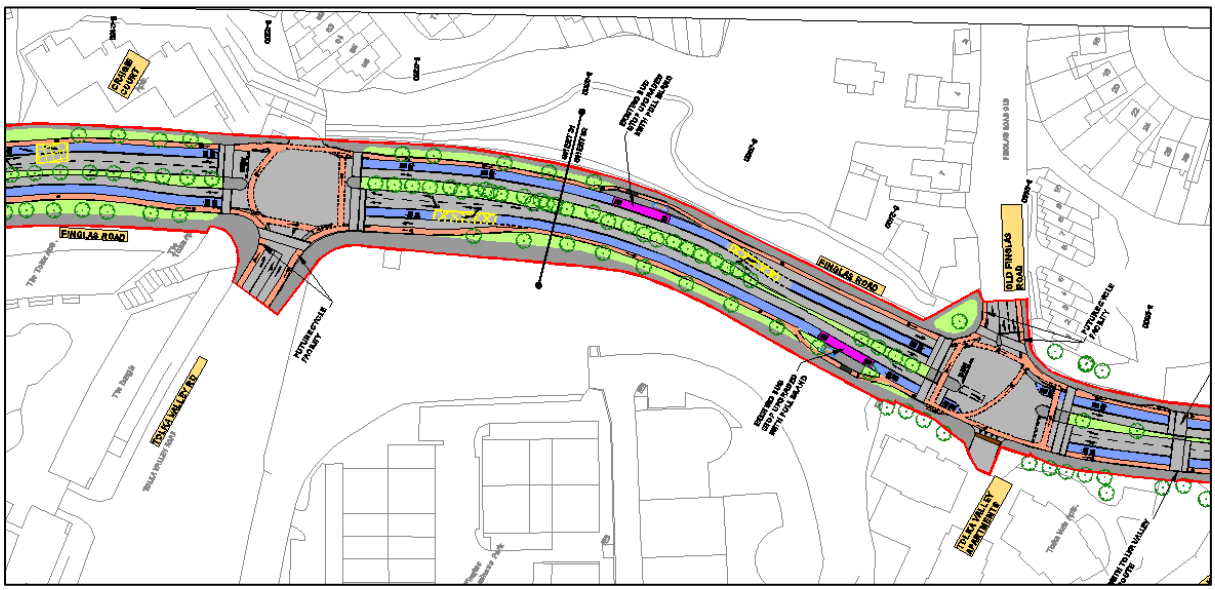


Figure 2-5-8: Extract from General Arrangement Drawing Sheet 30

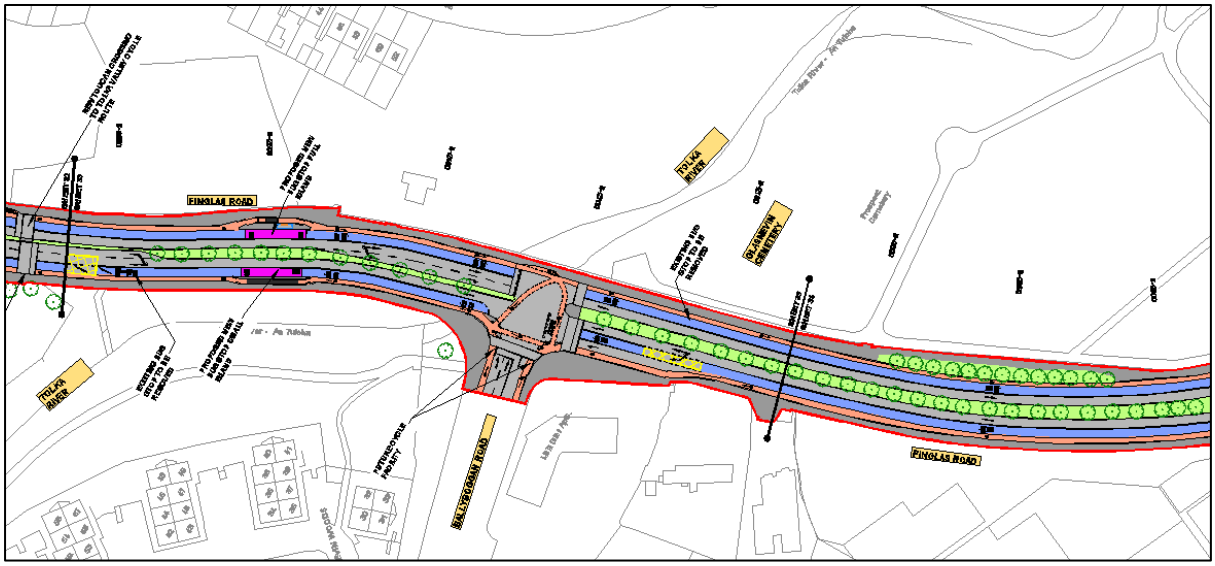


Figure 2-5-9: Extract from General Arrangement Drawing Sheet 31

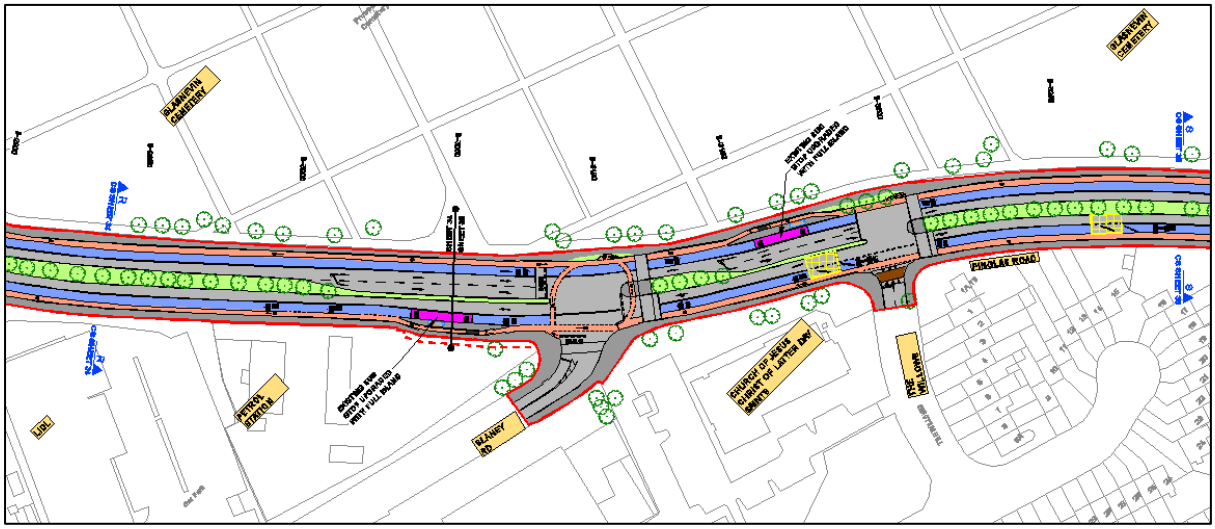


Figure 2-5-10: Extract from General Arrangement Drawing Sheet 32

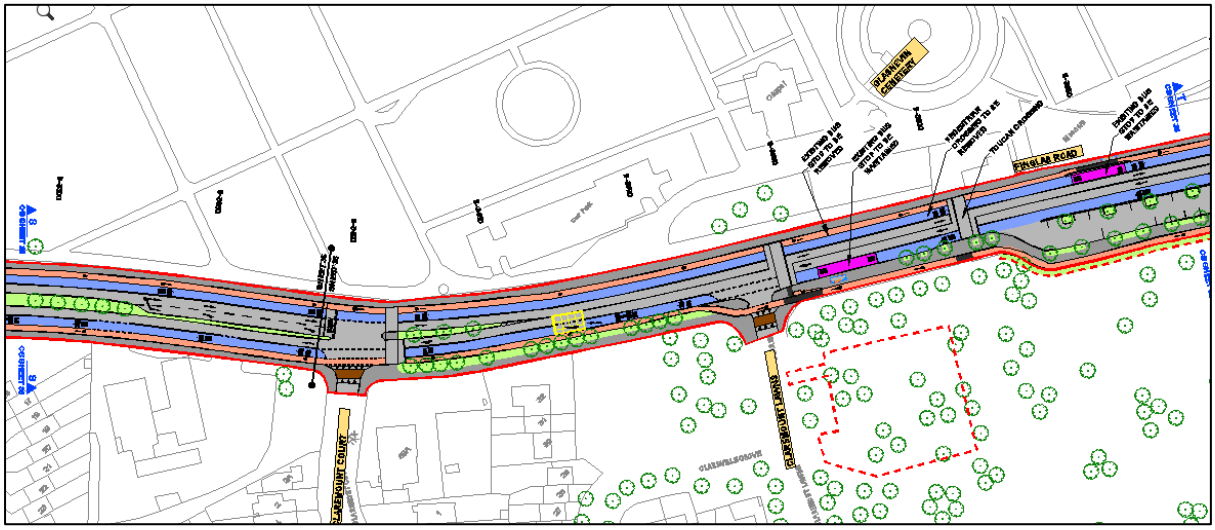


Figure 2-5-11: Extract from General Arrangement Drawing Sheet 33

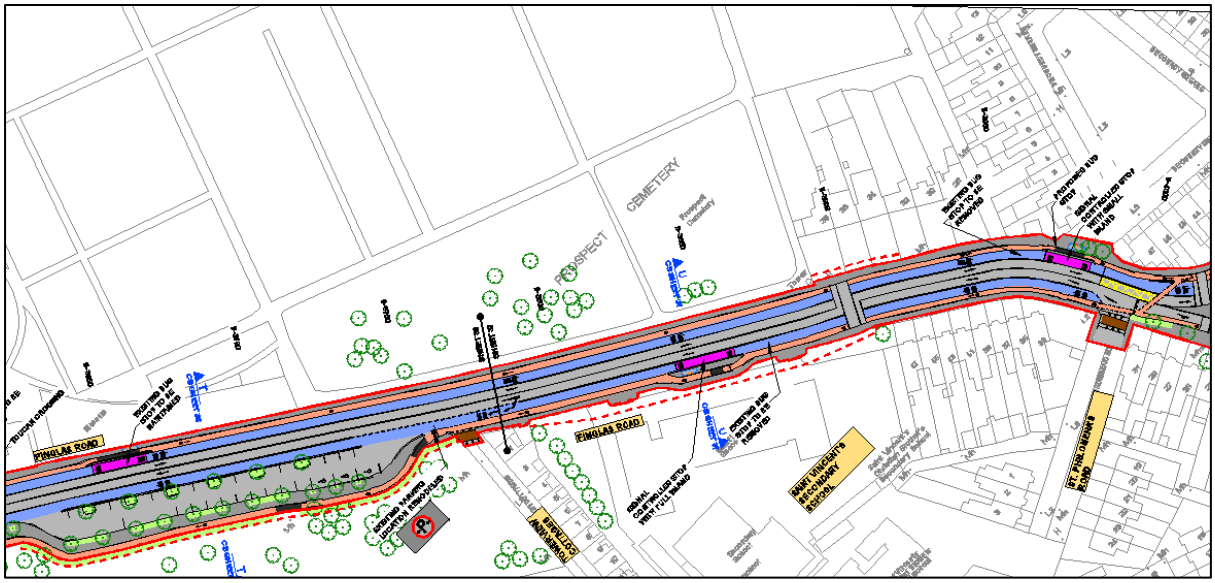


Figure 2-5-12: Extract from General Arrangement Drawing Sheet 34

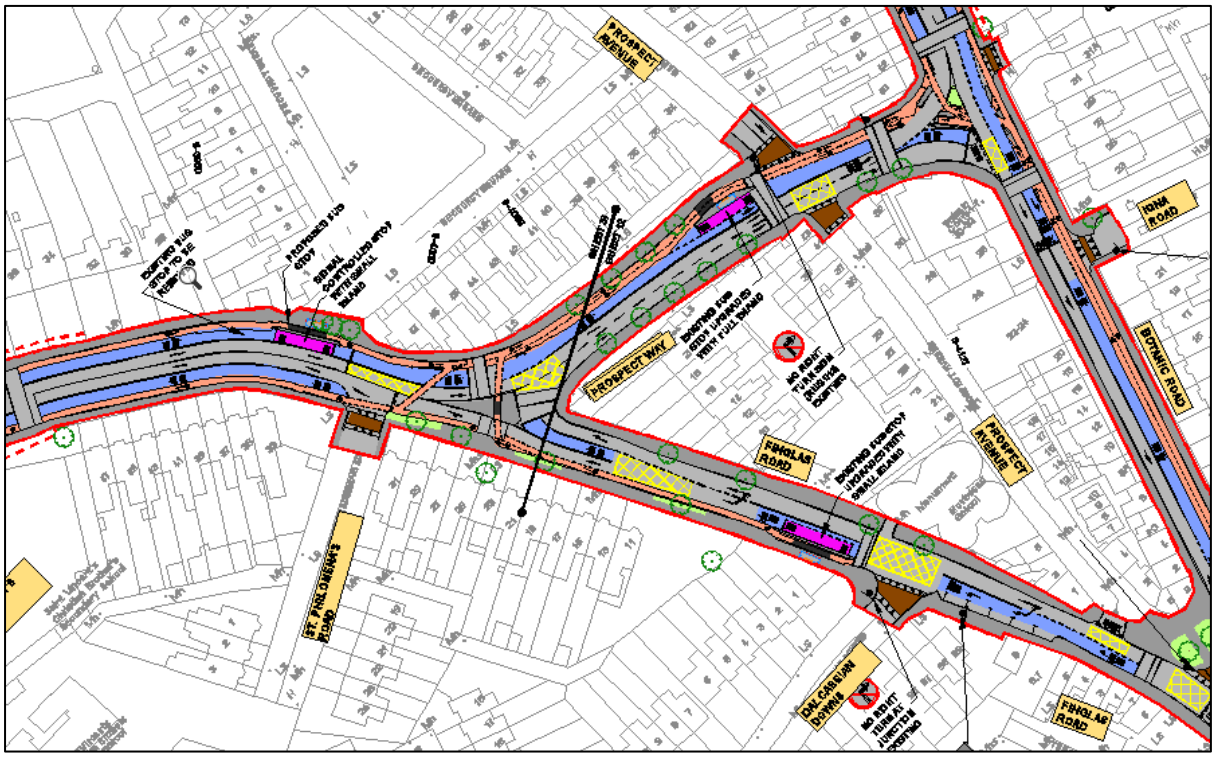


Figure 2-5-13: Extract from General Arrangement Drawing Sheet 35

2.5.2 Overview of Submissions Received for Sections 5, 6 &7

Table 2.3 below lists the submissions made in respect of the Proposed Scheme at Finglas Road from St. Margaret's Road to Hart's Corner.

Table 2.4: Submissions Made in Respect of Finglas Road from St Margaret's Road to Hart's Corner

No	Name	No	Name
2	John Keoghan	25	Tesco
17	Paul McAuliffe TD	70	Sindy & Noel Fitzpatrick

There were few common views between the submissions and as such, these have not been grouped by theme.

2.5.2.1 Sindy & Noel Fitzpatrick / Paul McAuliffe TD – Footpath link at North Road

Issue raised:

This submission raised a concern about the proposal to provide a new pedestrian link beside the Fitzpatrick home at No.117 North Road, Finglas, in terms of anti-social behaviour.

Response to issue raised:

The proposed new footpath will link from North Road to a new bus stop on Finglas Road beside the existing footbridge just south of the roundabout at St. Margaret's Road, as shown in Figure 2-5-14.

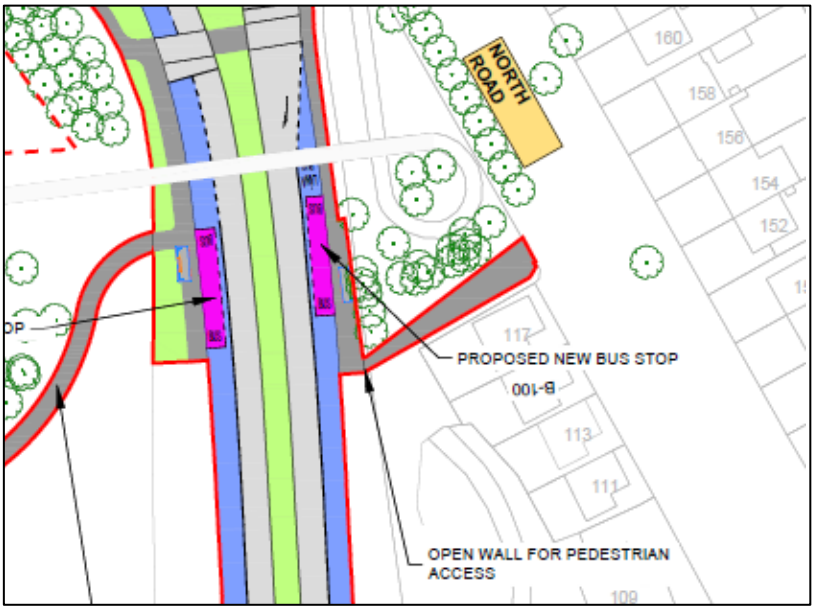


Figure 2-5-14: Proposed footpath link at North Road

A more direct link to the new bus stop is desirable to maximise the catchment area to the spine bus service. The opening up of the currently enclosed area under the footbridge will bring increased pedestrian activity which should deter anti-social activity compared to the current situation. The Bus Stop Review Report in Appendix H of the Preliminary Design Report (PDR) (Supplementary Information) includes a catchment analysis map that demonstrates the wide area that will be served by the proposed bus stop on Finglas Road just south of the junction with St. Margaret's Road as shown in Figure 2-5-15. If the proposed new direct footpath link were not provided from North Road to the southbound bus stop on Finglas Road, it would reduce the catchment area of this stop by 150m due to the additional walking distance on the existing route to the top of North Road and then back southwards past the roundabout.

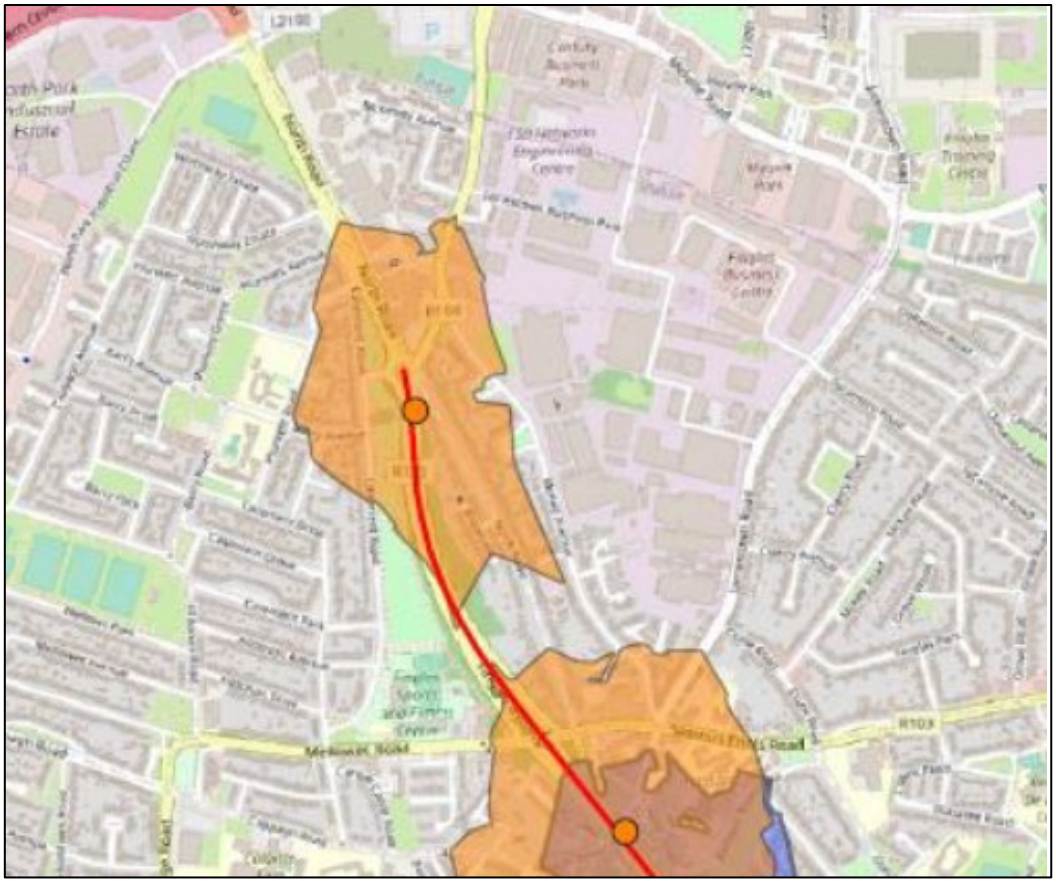


Figure 2-5-15: Extract from Catchment Map for CBC at Finglas North (PDR Appendix H, Figure 3.5)

2.5.2.2 Tesco – Junction at Clearwater Shopping Centre

Issue raised:

This submission from RMLA on behalf of Tesco who operate a supermarket in the Clearwater Shopping Centre comments on the proposed modification of the junction on Finglas Road in terms of swept paths for large delivery vehicles.

Response to issue raised:

The proposed modifications at this junction will remove the left-slip lanes and provide improvements for the benefit of pedestrians and cyclists. In accordance with the design principles of the *Design Manual for Urban Roads and Streets* which promotes deliberately tight road layouts to require vehicles to move slowly and carefully, the proposed road layout fits the swept-path of large lorries but avoids excessive road space that would encourage faster traffic movements.

2.5.2.3 John Keoghan – Clareville Grove / Claremont Lawns

Issue raised:

This submission objects to the loss of some public open green space to provide replacement parking on Finglas Road opposite Glasnevin Cemetery.

Response to issue raised:

Glasnevin Cemetery is the largest and busiest cemetery in Ireland for which the existing parking facilities are limited and heavily used. If the existing parking on Finglas Road were to be removed for the proposed bus lane and not replaced, this would cause parking to displace into the residential area at Claremont Lawns with an impact for that residential community. Only a very small 0.1 Hectare area of the large 2 Hectare green space would be required for the proposed car park, which is 5% of the total.

2.6 Whole Scheme Submissions

2.6.1 Overview of Submissions

Issues related to the whole scheme are addressed in this section.

2.6.2 Connection to the City Centre

Summary of issue raised

Some submissions say that the southern extent of the Proposed Scheme at Arran Quay does not actually link to the City Centre, and it is unclear how bus passengers will reach the City Centre.

Response to issue raised

The Proposed Scheme will provide necessary infrastructure to support the BusConnects Network Redesign as shown at:

https://busconnects.ie/initiatives/new-dublin-area-bus-network/

The Proposed Scheme will serve several parts of the proposed bus route network as shown in Figure 2-13:

- Spine E (Ballymun - City Centre - Foxrock Church)
- Spine F (Finglas - City Centre – Kimmage) Spines, both of them running along O'Connell Street
- Radial Routes 7+8 (Glasnevin – Merrion Square), running across the Quay at Father Mathew Bridge.

Spines E and F turn eastwards off the Proposed Scheme at Western Way and Whitworth Road respectively, which will bring passengers into the city centre. South of Western Way Radial Routes 7 and 8 will continue along the Proposed Scheme to Arran Quay.

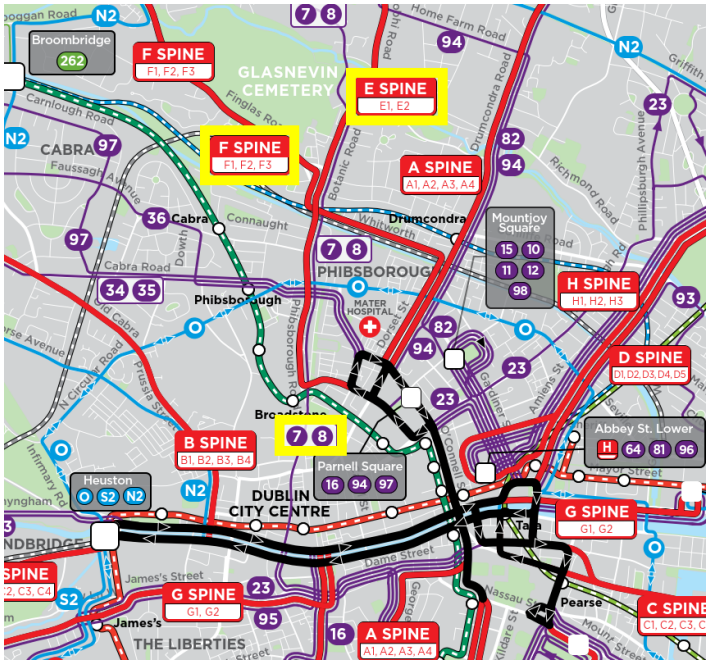


Figure 2-13: Extract from BusConnects Network Redesign Map

2.6.3 Consultation process

Summary of issue raised

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

Response to issue raised

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

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

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

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

Thereafter, the legislation provides for the holding of an Oral Hearing, enabling direct public engagement and participation in the decision making process.

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

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

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

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

2.6.4 Bus Journey Time Savings

Summary of issue raised

One submission (from Brendan Heneghan) queried discrepancies between the bus journey time savings described in the EIAR compared to higher time savings described in earlier public consultation information.

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.

Response to issue raised

Section 6.2.5.2.3.1 of Chapter 6 (Traffic & Transport) in Volume 2 of the EIAR 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 increase 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.”*

2.7 Department of Housing – Development Applications Unit (DAU)

The submission from DAU addresses two issues:

- Archaeology
- Nature Conservation – at the Royal Canal.

2.7.1 Archaeology

The submission by DAU states that *"*The Department has reviewed the EIAR and is broadly in agreement with the findings in relation to Archaeology and Cultural Heritage. It then proposes a set of conditions to be attached to any consent granted for the Proposed Development, which include mitigation measures, a Construction Environmental Management Plan, a Project Archaeologist to observe the works and provision of a final archaeological report to the Planning Authority and Department describing the results of all archaeological monitoring, archaeological excavation/investigative works etc.

2.7.2 Response to Issue Raised in DAU Submission

The NTA welcomes the engagement of the Department in relation to the important matters of cultural heritage. The NTA has extensively considered the potential of the Proposed Scheme to impact on archaeology and has outlined a number of mitigation measures which addresses these risks in the EIAR. The NTA acknowledges the comments raised by the DAU, all of which are addressed in Chapter 15 (Archaeological & Cultural Heritage) in Volume 2 of the EIAR, including appropriate mitigation measures as noted by the DAU.

As part of the EIAR, a Construction Environmental Management Plan (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.*

With regard to the request for a final archaeological report to be provided to the Planning Authority and the Department, 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 Archaeology Section of Dublin City Council 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.

2.7.3 Nature Conservation at the Royal Canal

The DAU has set out a number of suggested conditions that are recommended for An Bord Pleanála to attach to a planning consent. The NTA provides responses to each of the proposed conditions.

Proposed Condition No.1

> *"That a Cross Guns Otter Bypass Plan shall be submitted to the planning authority for its written agreement before the commencement of any works in connection with the proposed scheme in the vicinity of Cross Guns Bridge, Phibsborough, including the erection of a pedestrian/cycle bridge downstream of Cross Guns Bridge, or any lowering of the water level in the Royal Canal; this plan to have been previously agreed with Waterways Ireland and the Department of Housing, Local Government and Heritage, and to provide for the installation of chute or ladder at the lower gate of the 5th Lock or at the canal-side between that lock and Cross Guns Bridge to permit the movement of otters past the 5th Lock without having to traverse the Phibsborough Road, and to set out measures to ensure that passage for otters past the location of the new pedestrian/cycle bridge downstream of Cross Guns Bridge is maintained at least during most night hours for the duration of the construction period of the former bridge."*

NTA Response

The NTA has included appropriate provisions for otter passage along the Royal Canal within the Proposed Scheme. The relevant arrangements at the proposed footbridge over the canal are shown in Figure 2-7-1, which is an extract from Ballymun 03 Sheet 1 in the '02. General Arrangement' drawings in Volume 3 of the EIAR. On the northern bank (left in the image) the bridge support will be set back 3m from the water's edge, and on the southern side of the canal a 0.5m wide planter box will be provided along the face of the retaining wall for the ramp. These passages along the banks will allow for wildlife passage along the canal beside the water channel. Specific mitigation measures with regard to Otter are included in Section 12.5.1.4.3 of Chapter 12 (Biodiversity) in Volume 2 of the EIAR, including that:

> '*....the appointed contractor will engage a suitably qualified and / or licensed ecologist(s) to oversee and advise works at watercourse crossings during construction to communicate all findings in a timely manner to the NTA and statutory authorities, to acquire any licenses / consents required to conduct the work, and to supervise and direct the ecological measures associated with the Proposed Scheme*.'

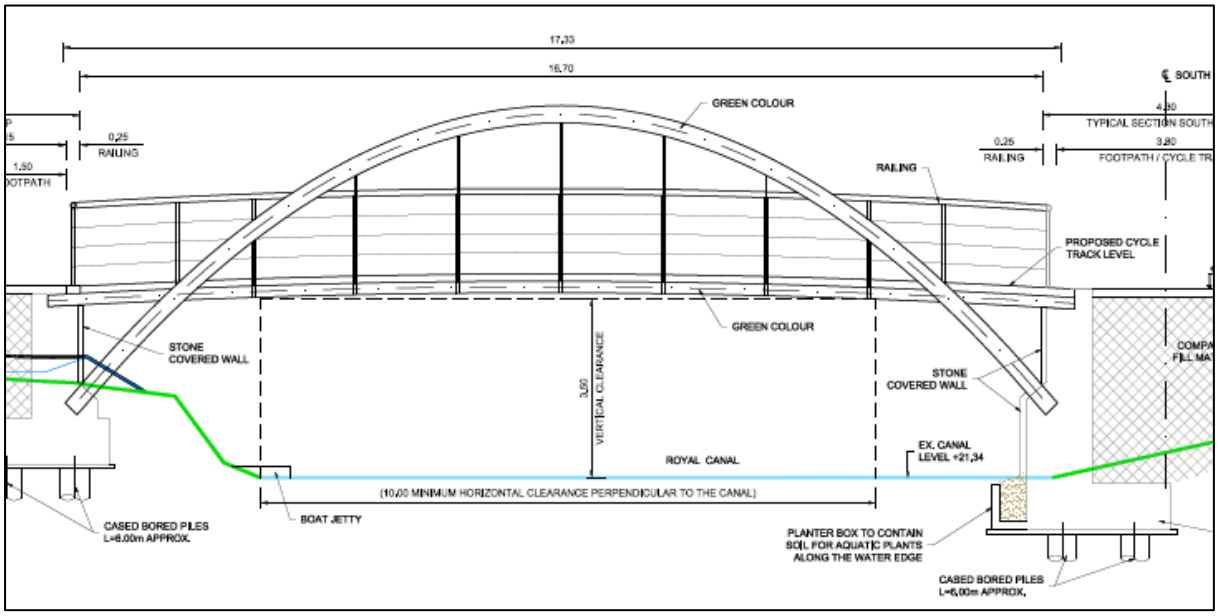


Figure 2-7-1: Elevation of the Proposed Royal Canal Footbridge

The Proposed Scheme does not include any proposals for works under the existing Cross Guns Bridge (or Westmoreland Bridge) over the Royal Canal at Phibsborough Road, or the adjoining 5th Lock. Any

interventions at this existing bridge and canal lock are a matter for Waterways Ireland and cannot be addressed by NTA in the Proposed Scheme for BusConnects.

Proposed Condition No.2

> *"That no removal of trees or vegetation shall occur during the main bird breeding season from March to August inclusive."*

NTA Response

Vegetation identified for removal will be removed in accordance with BS 3998:2010 Recommendations for Tree Work. As set out in the Construction Environmental Management Plan (CEMP) (Appendix A5.1 in Volume 4 Part 1 of 4 of the EIAR) and Section 12.5.1.5.1.2 of Chapter 12 in Volume 2 of the EIAR, , where practicable, vegetation (e.g., hedgerows, trees, scrub, bankside vegetation and grassland) will not be removed, between 01 March and 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 National Parks and Wildlife Services.

Proposed Condition No.3

> *"That at all the mitigation measures to avoid the pollution of surface water runoff from the proposed development, including construction compounds, during the construction phase of the proposed development set out in the Surface Water Management Plan (SWMP) submitted in support of the present application shall be implemented in full."*

NTA Response

The Proposed Scheme has laid out a detailed plan to prevent damage to the environment from water pollution. Chapter 13 (Water) in Volume 2 of the EIAR includes Table 13.19 which demonstrates the Scheme's compliance with all aims to achieve Good Ecological Status (GES) or prevent the deterioration of sites with Good Ecological Potential (GEP).

As part of the EIAR, a CEMP has been prepared for the Proposed Scheme and is included as Appendix A5.1 in Volume 4 Part 1 of 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 the 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 Dublin City Council 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.

2.8 Inland Fisheries Ireland

The submission from IFI concerns the Proposed Scheme where it will cross the River Tolka and the Royal Canal.

2.8.1 Issue Raised: Protection of Waterbodies

Relevant extracts from the IFI submission are:

> Because of the importance of these waterways it is recommended that the "Guidelines on protection of fisheries during construction works in and adjacent to waters" (2016) http://www.fisheriesireland.ie/fisheries-management-1/624-guidelines-on-protection-of-fisheries-during-construction-works-in-and-adjacent-to-waters should be consulted when planning to undertake works near any of the relevant rivers and streams. The maintenance of habitat integrity (both in-stream and riparian) is essential in safeguarding the ecological value of this important urban natural resource.

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

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

Response to issue

Section 13.5 of Chapter 13 (Water) in Volume 2 of the EIAR sets out the measures envisaged to avoid, prevent or reduce any potential significant adverse effects on the environment identified in Section 13.4 and, where appropriate, identify any proposed monitoring of the efficacy of implementing those mitigation measures.

Construction phase mitigation measures are described in Section 13.5.2. A Surface Water Management Plan (SWMP) has been prepared and is provided in the CEMP contained in Appendix A5.1 in Volume 4 Part 1 of 4 of the EIAR.

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

- A requirement for a Pollution Incident Response Plan;
- 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; and
- Monitoring.

Section 5.4.1.2 of Appendix A5.1 (CEMP) in Volume 4 Part 1 of 4 of the EIAR lists the guidance documents which have been taken into account when preparing the SWMP and the control and management measures relating to surface water management. This includes the *"Guidelines on Protection of Fisheries During Construction Works in and Adjacent to Waters (Inland Fisheries Ireland 2016)".*

Mitigation for the Operational Phase has been built into the design of the Proposed Scheme, which is outlined in Section 13.4.1.1 of Chapter 13 (Water) in Volume 2 of the EIAR. No additional mitigation is required.

2.8.2 Issue Raised: The Royal Canal

The submission from Inland Fisheries Ireland (IFI) is as follows:

> *"The planned crossing of the Royal Canal must be fish-passable structures and preferably in the form of clear span designs to minimise instream impact."*

Response to issue

The NTA welcomes the engagement of Inland Fisheries Ireland in relation to the important matters of nature conservation at the Royal Canal pNHA. 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.

A clear span footbridge is proposed over the Royal Canal which will not impede the canal channel and any fish movements. During the construction works it is proposed to lower the water level in the canal between the 4th and 5th locks to facilitate the works, but a minimum 0.5m water depth will be retained at all times to support aquatic life in the canal. On each bank of the canal, passageways will be provided for otters, and other mammals.

Full details of these construction works at the canal can be found in Chapter 5 (Construction) in Volume 2 of the EIAR. As outlined and considered in Chapter 12 (Biodiversity) in Volume 2 of the EIAR:

> "*In light of the design approach and through the employment of standard environmental site practices throughout the Construction Phase, as detailed in Appendix A5.1 (CEMP) in Volume 4 of this EIAR, any changes in hydrological regime are considered temporary in nature. Any impacts of habitat degradation due to changes in hydrological regime of the River Tolka and tributaries and Liffey Estuary Lower would be temporary in nature during the Construction Phase of the Proposed Scheme. No mitigation is proposed.*"

In addition, during the Operational Phase, the proposed Royal Canal pedestrian / cycle bridge has been designed in consultation with IFI / Waterways Ireland and the design criteria set out in Guidelines for the Crossing of Watercourses during the Construction of National Road Schemes (NRA 2005a) and the Guidelines on Protection of Fisheries During Construction Works in and Adjacent to Waters (IFI 2016). This will maintain fish passage during the operation of the Proposed Scheme and therefore, will result in a Neutral impact to fish species. There will be a narrow reduction in the width of the Royal Canal at the location of the proposed Royal Canal pedestrian / cycle bridge. Following its completion and the cessation of works, including the extraction of temporary screens from the Royal Canal itself, the remaining channel will be fully accessible to fish and other fauna to commute along. Given the relative size of the Proposed Scheme and the considerable availability of canal habitat for coarse fish, the habitat severance / barrier effect during operation on coarse fish species (and potentially eel) is not considered to be significant at any geographic scale.

2.9 Dublin Commuter Coalition

Overview of submission

This submission raised the following issues:

i) Advocate for the Proposed Scheme
ii) Enforcement
iii) Bus lane hours
iv) Junction Design
v) Pedestrian Crossings
vi) Bus Stops
vii) Cycle Parking
viii) Phibsborough including Doyle's Corner
ix) Extents of Cycle Tracks and Bus Lanes
x) Ballymun Road
xi) Claremont Lawn

2.9.1 Advocate for the Proposed Scheme

Summary of issue

The submission sets out that the Dublin Commuter Coalition is a voluntary advocacy group for public transport users, cyclists, and pedestrians in Dublin and surrounding counties. The submission notes that the Dublin Commuter Coalition has been engaging with the NTA over the last three years and they believe the project will be a catalyst for greater usage of public transport and active travel with the following statement:

> *"We strongly support the BusConnects Core Bus Corridors project, and we are glad to see the more than three years of public engagement finally result in a planning application. We believe this project has the potential to be a catalyst for greater usage of public transport and active travel along the route."*

In particular the submission supports the proposed Bus Gate at St. Mobhi Road and states the following:

> *"We fully support the implementation of a bus gate on Mobhi Road. The bus gate will allow for bus priority whilst retaining most of the mature trees. The current lack of northbound bus priority on Mobhi Road results in delayed, unreliable and bunched buses."*

Response to issue

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

2.9.2 Enforcement

Summary of issue

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

Response to issue

The NTA acknowledges the comments raised in relation to a request for camera enforcement at bus lanes, bus priority signals, bus gates, and turning restrictions. 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 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.

2.9.3 Bus Lane Operating Hours

Summary of issue

The submission highlights the need for all bus lanes to operate on a 24 hours / 7 day week basis.

Response to issue

The NTA agrees with the necessity of full time bus lane operational hours, and this will be applied along the length of the Proposed Scheme, as well as generally throughout the BusConnects CBC network. However, where bus gates are proposed these may not always operate on a 24 hours / 7 day week basis subject to how necessary they are to ensure bus priority in certain directions at certain times. For example the proposed northbound bus gate on St. Mobhi Road in the Proposed Scheme will operate only in the evenings between 4pm and 8pm.

2.9.4 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 further notes that there are several junctions, at St. Pappin Road and St. Canice's Road that do not include protection for cyclists.

Responses to issues

1 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 do not form part of the Proposed Scheme application description.

It is important to note that no two junctions are the same. Junctions on the Proposed Scheme have broadly been categorised into 4 types of junction as set out in Appendix A4.1 BusConnects Preliminary Design Guidance Booklet (PDGB) in Volume 4 Part 1 of 4 of the EIAR and specifically set out at each location in the Junction Design Report which have been included in Appendix A6.3 in Volume 4 Part 2 of 4 of the EIAR and summarised in Table 4.4, Table 4.10, Table 4.19, Table 4.27,Table 4.32, Table 4.36 and Table 4.40 in Chapter 4 (Proposed Scheme Description) in Volume 2 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 2-9-1 below, offers significant safety improvements compared to the traditional junction layout. The deflection of the cycle track at the junction allows the protection kerb (Note 4) to be positioned on the corner of the junction. In urban locations subject to spatial constraints, the protection kerb provides a tighter turning radius for vehicles and will force the left-turning motorist to reduce speed before making the tighter turn. This design layout also keeps straight-ahead and right-turning cyclists on the raised-adjacent cycle track as far as the junction, avoiding any cyclist-vehicle conflict at weaving and merging lanes, for example, where access to a dedicated left-turn lane would previously have necessitated a vehicle to cross the cycle lane. Right-turning cyclists will navigate the cycle lane on the junction and turn right (in a controlled manner) after it crosses the side arm. Other benefits to this junction design include

a) Traffic Signal arrangement removes any uncontrolled pedestrian-cyclist conflict;

b) Raised and protected cycle track approaching junction;

c) Reduced risk of side-swipe due to the removal of cyclist-vehicle conflict at weaving and merging lanes on all approaches;

d) Improved right-turning safety; and

e) Improved sight lines for left turning traffic.

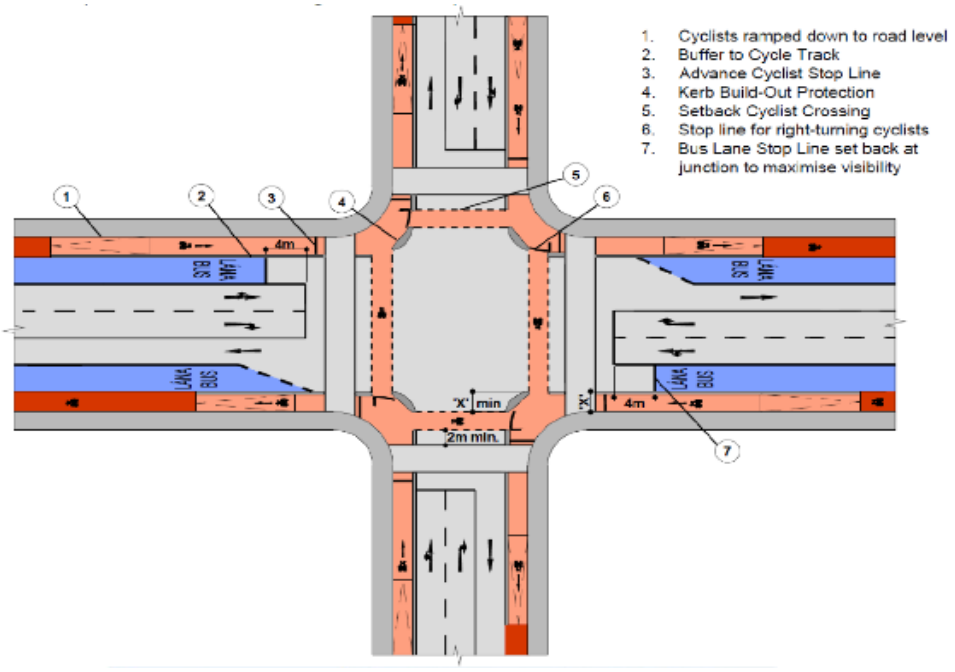


Figure 2-9-1: Typical Junction Layout from BusConnects Design Guidance Booklet

2 Pedestrian-Cyclist Conflict

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

An important consideration during the development of the PDGB was 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.

3 Use of Traffic Signals to Yield to Cyclists

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 2-9-2 below).

Figure 2-9-2: 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.

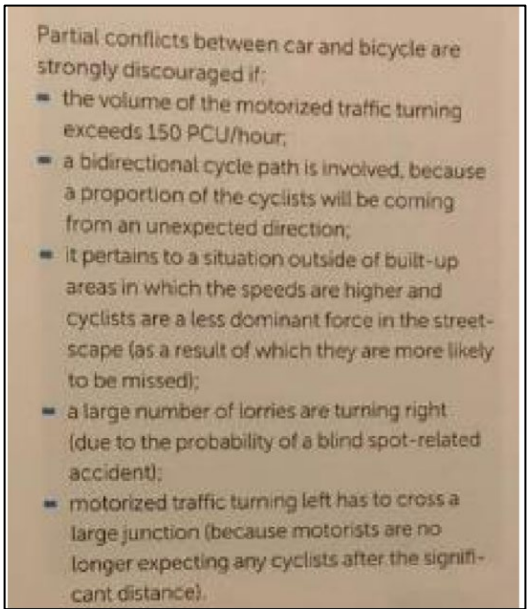

Partial conflicts between car and bicycle are strongly discouraged if:
- the volume of the motorized traffic turning exceeds 150 PCU/hour;
- a bidirectional cycle path is involved, because a proportion of the cyclists will be coming from an unexpected direction;
- it pertains to a situation outside of built-up areas in which the speeds are higher and cyclists are a less dominant force in the street-scape (as a result of which they are more likely to be missed);
- a large number of lorries are turning right (due to the probability of a blind spot-related accident);
- motorized traffic turning left has to cross a large junction (because motorists are no longer expecting any cyclists after the signifi-cant distance).

Figure 2.11: 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[1]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.

The designs of the key junctions on the Proposed Scheme have implemented this approach to achieve optimum operational effectiveness including the efficient movement of cyclists. Introducing separate signal phases will increase delay for cyclists at junctions. This arrangement will promote the sustainable mode hierarchy for cyclists at junctions by providing priority to ahead cyclists over vehicles turning left. At each of these junctions the left turning vehicle traffic volumes in these locations are estimated to be less than the 150PCU threshold and similarly low HGV volumes are estimated in line with the principles established by international guidance. In addition to specific signage such as that presented in Figure 39 and Figure 30 of the PDGB, at each of the seven locations, a three to five second early start for cyclists is typically provided to further mitigate the potential for the number of interactions with vehicles/cyclists at these locations. The Proposed Scheme has also been subject to Road Safety Audits at different stages that have informed the design development of the Proposed Scheme.

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

2.9.5 Junctions at St. Pappin Road and St. Canice's Road

These are two simple tee-junctions on Ballymun road as shown in the following figures. St. Pappin Road has existing traffic signals, while St. Canice's Road is proposed to be upgraded with new traffic signals. Generally at such simple junctions the existing geometry is proposed to be largely retained and modified

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

slightly with tighter corner radii and shorter crossing distances of the side road for pedestrians and cyclists. These adjustments will provide greater safety for cyclists by requiring traffic to turn very slowly. There will also be a separate traffic signal stage for cyclists to proceed ahead of general traffic. These provisions will provide good protection for the safety of cyclists as an improvement on the current arrangements.

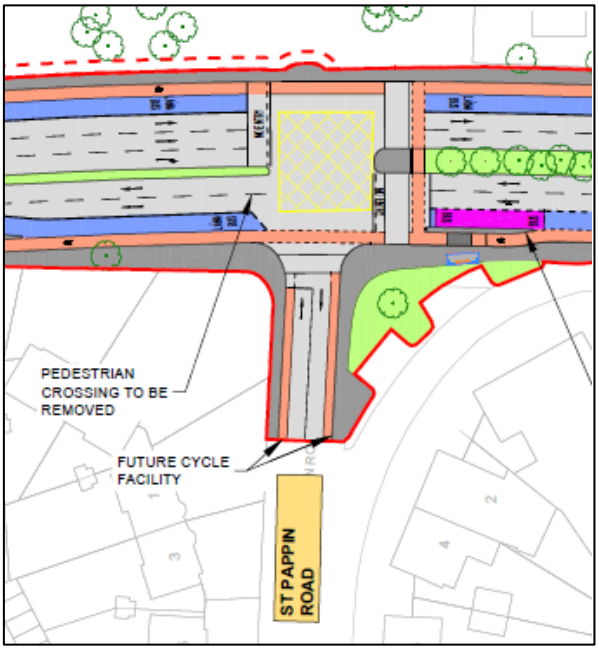


Figure 2-9-3: Proposed Junction Layout at St. Pappin Road

At the St. Canice's Road junction there will also be a raised table entry platform across the side road as a further traffic control measure.

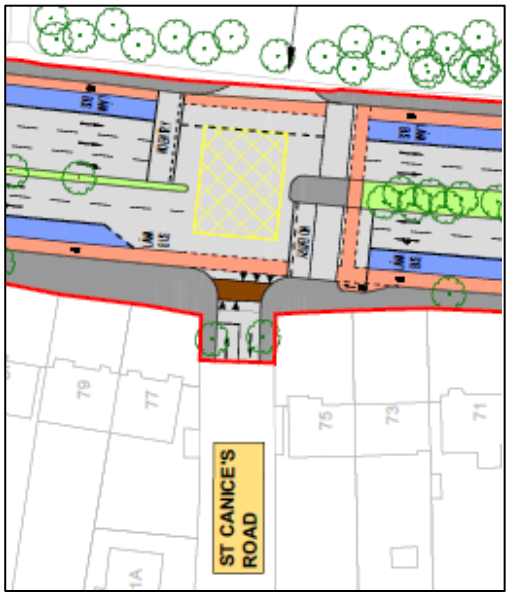


Figure 2-9-4: Proposed Junction Layout at St. Canice's Road

2.9.6 Pedestrian Crossings

Summary of issue

The submission has queried the design rationale for providing two-stage crossings as part of the Proposed Scheme at two locations: Western Way/Constitution Hill (Sheet 16 of the '02. General Arrangement' drawings in Volume 3 of the EIAR), and Arran Quay/Church Street (Sheet 18 of the '02. General Arrangement' drawings in Volume 3 of the EIAR).

It also queries the absence of pedestrian crossings on one arm of 6 junctions along Finglas Road, which are at:

- Wellmount Road
- Ballyboggan Road
- Slaney Road
- The Willows
- Claremont Court
- Claremont Lawns

Response to issue

The Proposed Scheme will provide major improvements at almost all of the large number of junctions along the scheme, where pedestrian crossing distances will be shortened through removal of left-turn slip lanes and tightening of corners. Multi-stage pedestrian crossings will be simplified to single stage crossings at as many junctions as possible.

The summary level design rationale for each of the junctions on the Proposed Scheme is set out in Appendix A6.3 (Junction Design Report) in Volume 4 Part 2 of 4 of the EIAR.

At the Western Way/Constitution Hill junction the LUAS Green Line tramway crosses through the middle of the junction where there is an existing additional traffic island to suit the signal operations for the tram within the overall traffic system. It is not proposed to modify this recently constructed junction as part of the Proposed Scheme.

The Arran Quay/Church Street junction is at the end of the Proposed Scheme and will not be modified other than for the inclusion of bus lanes on the Church Street arm of the junction. Modification of this junction may be included in the future separate Liffey Cycle Route scheme which is part of the GDA Cycle Network Plan.

For those junctions at which pedestrian crossings are not proposed at all of the arms, the existing arrangements are retained as the need for additional crossings was not evident. In these small minority of junctions within the Proposed Scheme the numbers of pedestrians are very low in general, mainly due to limited active frontage at that location, such as along Finglas Road for example. The existing traffic signal staging has been retained at these junctions where the volumes of traffic are quite high, and the main road pedestrian signal runs in tandem with the right turn signal into the side road. For overall capacity reasons, and to enable inclusion of suitable priority for buses and cyclists, it was decided not to expand the provisions for pedestrians in the absence of a clear need and justification at these junctions.

2.9.7 Bus Stop Design

Summary of issue

The submission raises concerns about the proposed bus stop designs and in particular the width of bus stop islands that are proposed which may lead to pedestrian and cyclist conflicts. It lists numerous locations where narrow bus stop islands are proposed and seeks the provision of larger full-sized bus stop islands.

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 (PDGB) in Volume 4 Part 1

of 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 Section 11.1 Island Bus Stop of the PDGB, these types are the preferred bus stop option to be used as standard on the Proposed 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, Section 11.2 Shared Bus Stop Landing Zone of the PDGB 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, but cyclists will be required to give way to pedestrians crossing the cycle track.

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 outlines the location where island bus stops are proposed. Section 4.14.5 of the same document outlines the locations where shared landing area bus stops are proposed. In most cases the shared landing zone is proposed at minor stops with low usage, or where alighting occurs more than boarding, which shortens the time duration of activity at the stop and where there will be few passengers waiting and less need for a generous waiting area.

2.9.8 Bus Stop Locations

Summary of issue

The submission raises concerns about the location of two bus stops at the northern end of the Proposed Scheme at Northwood and Santry Cross in the southbound direction. It also questions the close spacing of bus stops along Ballymun Road between Collins Avenue and Griffith Avenue which is on average less than the optimum 400m spacing.

Response to issue

Appendix H of the Preliminary Design Report included in the Supplementary Information includes the Bus Stop Review Report. This report sets out a comprehensive exercise which has been carried out to review existing bus stops along the route of the Proposed Scheme and, where appropriate to rationalise these stops in line with best practice principles related to bus stop placement. These principles include:

- Driver and waiting passengers are clearly visible to each other;
- Located close to key local facilities;
- Located close to main junctions without affecting road safety or junction operation;
- Located to minimise walking distance between interchange stops;
- Where there is space for a bus shelter;
- Located in pairs, 'Tail to tail' on opposite sides of the road;

- Close to (and on exit side of) pedestrian crossings;
- Away from sites likely to be obstructed; and
- Adequate footway width.

A main consideration in the siting of bus stops is to minimise walking distance between interchange stops. This exercise was carried out with cognisance of the interface with orbital routes proposed as part of the Dublin Area Bus Network Redesign, which involved significant liaison with the BusConnects Dublin Area Bus Network Redesign team.

The scope of the Proposed Scheme includes the provision of infrastructure for bus services routed along the main corridor to the City Centre. Infrastructure for orbital bus routes, if required, will be delivered as part of a separate orbital core bus corridor scheme, whereby the provision of bus stops, including their location, can be assessed on a holistic basis along the orbital corridor, taking into account the location of existing nearby bus stops which are outside the red line boundary of the Proposed Scheme.

The future proposed Metrolink station at Northwood is located to the north of where the proposed Spine Route E bus service will leave the Ballymun Road Corridor and extend eastwards into Northwood Avenue. In this context it is not appropriate for this Proposed Scheme to include a southbound bus stop directly at the future metro station. The BusConnects design team has coordinated with the MetroLink design team in this regard for consideration of a bus stop at a suitable location near the metro station as part of that other scheme.

In the vicinity of Santry Cross, there are two existing bus stops 150m to the north and 200m to the south of the major junction. These existing bus stops are well positioned to cater for the local catchments with short walking distances into the local residential areas, and therefore it would not be appropriate to relocate either of them closer to the junction. With regard to interchange with orbital bus routes, these orbital services travel along the section of Ballymun Road immediately south of Santry Cross, which means that passengers can interchange between services at a single bus stop on Ballymun Road without need for walking between stops.

Between Collins Avenue and Griffith Avenue there are 4 existing southbound bus stops and 5 existing northbound bus stops. One of the northbound stops will be omitted, and the locations of two others will be adjusted for better spacing. Some other minor adjustments include moving southbound Stop No.39 further south closer to Griffith Avenue.

There are several key locations along this section where bus stops are required to cater for particular demands as follows:

a) Close to Collins Avenue at the northern end and the proposed metro station.

b) At Dublin City University on the eastern side and St. Pappin Road which leads to a large catchment area to the west.

c) In the vicinity of Hampstead Avenue on the eastern side and of St. Canice's Road on the western wide with their associated catchment areas to the east and west of the CBC.

d) Close to Griffith at the southern end where there will be interchange with orbital bus services.

The average bus stop spacing in this section is 300m in this section, and each stop is needed for particular local catchment areas.

2.9.9 Bike Parking

Summary of issue

The submission notes that bike parking is not indicated on the General Arrangement Drawings.

Response to issue

The standard detail for bus stops included in the PDGB (Appendix A4.1 in Volume 4 Part 1 of 4 of the EIAR (page 23, Figure 34)) shown below includes 7 bike parking stands, with spaces for 14 bikes, at each bus stop.

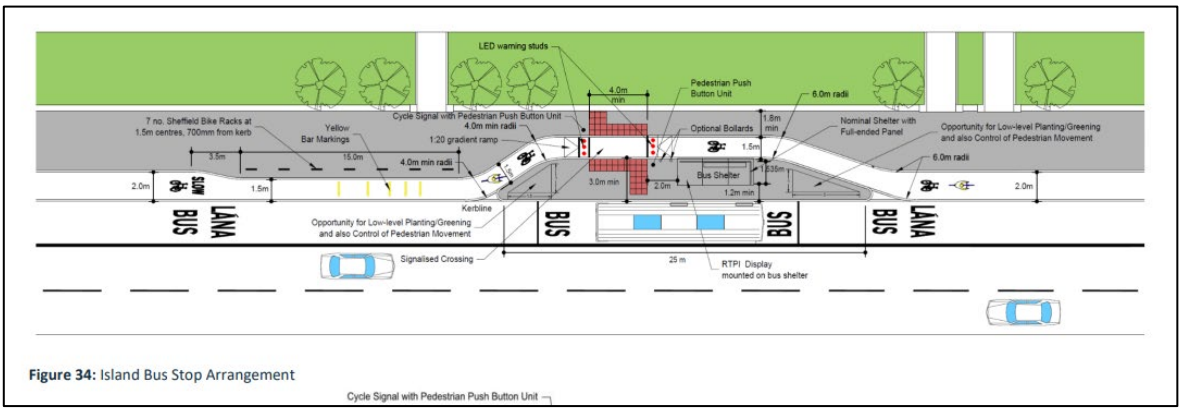


Figure 34: Island Bus Stop Arrangement

The Preliminary Design Report in the Supplementary Information describes how much bike parking is included in the Proposed Scheme as follows:

> **4.11.6 Cycling Parking**
> There is a limited amount of existing cycle parking directly along the Proposed Scheme, largely because most destinations are off-line with cycle parking provided away from the street. New cycle parking stands (7 no.) will be provided at each of the 65 bus stops along the route when they are upgraded to give a total of 455 cycle stands with capacity for 910 parked bicycles.

2.9.10 Cycle Route at Phibsborough

Summary of issue

The submission questions the omission of cycle tracks along Phibsborough Road in addition to the proposed cycle route along Royal Canal Bank, which it says is not in line with the GDA Cycle Network Plan.

Response to issue

The constraint of the limited road width along Phibsborough Road is addressed in Section 3.3.3 (on Page 27) of Chapter 3 (Consideration of Reasonable Alternatives) in Volume 2 of the EIAR, and in the Preferred Route Option Report in the Supplementary Information, summarised as follows:

> *"Through Phibsborough, along R108 Phibsborough Road over a length of 1.1km from the Royal Canal to R135 Western Way, the street is too narrow to accommodate both bus lanes and cycle tracks. The option of a three-lane layout with discontinuous bus lanes and bus priority signal control was considered, but this would have introduced greater risk for reliable bus operations. Instead, there is a suitable parallel cycle route, just 100m to the east of R108 Phibsborough Road, along Royal Canal Bank which will cater for the majority of cyclists along the corridor. It will link towards the City Centre via Geraldine Street and Blessington Street, or via R135 Western Way to Bolton Street. For local cycle trips it will be necessary to share the bus lanes through Phibsborough in a suitably low-speed 30km/h (kilometres per hour) environment."*

Cyclists can use the bus lanes through Phibsborough, where a 30 km/h speed limit will apply. Where there are short gaps in the bus lanes at particularly narrow sections of the streets, linking cycle tracks are provided so that cyclists will have a continuous facility that does not require use of the general traffic lane at any point. This arrangement is the best that can be achieved, and it provides a reasonable balance overall with two alternative routes available for cyclists through Phibsborough.

The GDA Cycle Network Plan anticipated the challenges in Phibsborough and did not indicate Primary Route 3 along Phibsborough Road as described by the submission by the Dublin Commuter Coalition. As shown on the map in Figure 2-9-5 Route 3 is clearly indicated along Royal Canal Bank, with no cycle route along Phibsborough Road.

Figure 2-9-5: Extract of GDA Cycle Network Plan at Phibsborough

2.9.11 Missing Cycle Lanes

Summary of issue

The submission questions the omission of cycle tracks at the following places:

- Southern end of Church St (Sheets 17 /18)
- Southbound on Ballymun Road (Sheet 20)
- Southbound on Botanic Road (Sheet 22)
- No cycling provision at all parallel to Finglas Road (Sheets 23-26).

Response to issue

Along Church Street the situation is the same as described earlier in Phibsborough where both bus lanes and cycle tracks cannot fit in the narrow street. Therefore, an alternative cycle route is identified along quiet streets through the Markets Area nearby the east. On Church Street cyclists may use the bus lanes and where there are short gaps in the bus lanes at particularly narrow sections of the street, linking cycle tracks are provided so that cyclists will have a continuous facility that does not require use of the general traffic lane at any point. This arrangement is the best that can be achieved, and it provides a reasonable balance overall with two alternative routes available for cyclists through the Markets Area and along Church Street.

At the southern end of Ballymun Road there is an existing northbound cycle lane, but none in the southbound direction. The southbound traffic volume is very small on this residential street and cyclists can share the road with this traffic in the downhill direction. The numbers of cyclists will also be very low as the main cycle route follows St. Mobhi Road nearby more directly towards the city centre.

On the northern section of Botanic Road the road width is too narrow for cycle lanes in both directions. Southbound cyclists will be able to link eastwards along the section of the proposed River Tolka Greenway at St. Mobhi Drive to join the main cycle route towards the city on St. Mobhi Road, thereby following a continuous segregated cycle route.

At the northern end of Finglas Road the cycling facilities in the Proposed Scheme do not extend north of Mellowes Road. Separate proposals are expected to be developed by Dublin City Council for cycling facilities along Mellowes Road, Casement Road and North Road as indicated in the GDA Cycle Network Plan.

2.9.12 Missing Bus Lanes

Summary of issue

The submission questions the omission of bus lanes at the following places:

- *One of the two lanes on the southbound exit ramp into Finglas Village*
- *The northbound lane turning left onto Wellmount Road from Finglas Road needs to be flagged as a bus lane to prevent it filling up with private vehicle traffic leaving the bottom of the village*

Response to issue

There is no bus service that would use a bus lane on the southbound exit ramp from the Finglas Bypass to Mellowes Road, and therefore such is not included in the Proposed Scheme.

On Finglas Road northbound there is a short section of shared traffic lane included on the approach to Wellmount Road. This lane is within a combined pair of staggered T-junctions, and it is used briefly during the signal sequence for westbound traffic to make the movement from east to west across the Finglas Road. This platoon of left-turning traffic runs at the same as the traffic exiting from Wellmount Road, and it clears before the next stage when the northbound traffic on Finglas Road is released, including the bus lane. This arrangement is more efficient for the overall operation of the pair of closely spaced junctions than the alternative suggested by the Dublin Commuter Coalition which would require all traffic to share a single lane and be held on red thus causing increased congestion at the junction to the disbenefit of all modes. A short section of bus lane as suggested would give no advantage to northbound buses, and it would cause major delay at this busy critical junction.

2.9.13 Width of Ballymun Road

Summary of issue

The submission welcomes the proposals to narrow Ballymun Road through Ballymun town centre to a single traffic lane in both directions, and it asks if the proposed parking could be omitted in favour of more planting and if the median of the dual carriageway could be removed.

Response to issue

Summary of issue

The submission welcomes the proposals to narrow Ballymun Road through Ballymun town centre to a single traffic lane in both directions, and it asks if the proposed parking could be omitted in favour of more planting and if the median of the dual carriageway could be removed.

Response to issue

The proposals in Ballymun town centre address the many different uses of the street in a balanced manner. There is a need for some street parking to service the various businesses and services in the

town centre, and this is provided for in an improved arrangement that achieves greater and more reliable bus priority as well as segregation for cyclists, along with a major increase in the number of street trees.

The central median island is a particular feature of Ballymun Road over the long length from the M50 junction at the northern end extending for 3.3km southwards to Griffith Avenue. It is one of only a few boulevard type streets in Dublin, and the long line of trees in the median is of considerable benefit to the urban landscape. To remove this median island over a short section locally in Ballymun town centre would be incongruous and incoherent in urban realm terms.

2.9.14 Doyle's Corner, Phibsborough

Summary of issue

The submission proposes a bus gate on Phibsborough Road at Doyle's Corner.

Response to issue

Phibsborough Road is a primary arterial radial route in the northern part of Dublin City. Historically it has been one of two main corridors into Dublin from the north of the country, along with the Swords Road. This key link cannot be closed to general traffic without causing major difficulties for general access to the city centre as there is only one realistic alternative route along Dorset Street to the east, which could not cope with the traffic that would be displaced.

2.9.15 Claremont Lawns

Summary of issue

The submission objects to the loss of green space for the proposed car park opposite Glasnevin Cemetery at Claremont Lawns.

Response to issue

Glasnevin Cemetery is the largest and busiest cemetery in Ireland for which the existing parking facilities are limited and heavily used. If the existing parking on Finglas Road were to be removed for the proposed bus lane and not replaced, this would cause parking to displace into the residential area at Claremont Lawns with an impact for that residential community. Only a very small 0.1 Hectare area of the large 2 Hectare green space would be required for the proposed car park, which is 5% of the total.

2.10 Dublin Cycling Campaign

Overview of submission

This submission raised the following issues:

i) Advocate for the Proposed Scheme;

ii) Cycling for all ages and abilities;

iii) Existing Cycling Conditions;

iv) Welcome Improvements;

v) Requested Modifications;

   a. Width of cycle track;

   b. Shared Walking and Cycling Spaces and Crossings;

   c. Right Turn Movements;

   d. Other Modifications; and

   e. Connections beyond the scheme.

vi) Junction Design;

vii) Location Specific Comments;

2.10.1 Advocate for the Proposed Scheme

Summary of issue

The introduction of the submission outlines that the Dublin Cycling Campaign supports the Proposed Scheme, with a number of reservations.

The submission sets out that the Dublin Cycling Campaign is a registered charity that advocates for better cycling conditions in Dublin. The submission notes that the Dublin Cycling Campaign has been engaging with the NTA through all stages of the project including multiple rounds of public consultation, community forums, and through one to one meetings.

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 Cycling Campaign are generally happy with the proposal, apart from certain elements, and welcomes the support from the charity for implementing the Proposed Scheme. The NTA notes the request for an Oral Hearing which will be a matter for An Bord Pleanála to decide. Requests to modify particular detailed design aspects of the Proposed Scheme are noted and the NTA has 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.

As referenced in Section 3.2.3 of the Traffic Impact Assessment Report (included as Appendix A6.1 in Volume 4 Part 1 of 4 of the EIAR), the recently published National Investment Framework for Transport in Ireland (NIFTI) sets out a hierarchy of travel modes to be accommodated and encouraged when investments and other interventions are made. Sustainable modes, starting with active travel (walking, wheeling and cycling) and then public transport, will be encouraged over less sustainable modes such as the private car. This aligns with the core objectives of the Proposed Scheme. It is noted that Section 3.2.3 of the Traffic Impact Assessment Report refers to the Draft National Investment Framework for Transport in Ireland (NIFTI) (2021), however, this policy was finalised and published on 21 December 2021. It is therefore clarified that this reference should be to the final National Investment Framework for Transport in Ireland (NIFTI) (2021).

2.10.2 Cycling for all ages and abilities

Summary of issue

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

Response to issue

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

Comments raised in relation to the recently published National Sustainable Mobility Policy are noted and the Proposed Scheme's aims, and objectives as set out in Section 1.2 of Chapter 1 (Introduction) in Volume 2 of the EIAR have a direct alignment to the objectives that underpin this policy.

2.10.3 General Comments on the Consultation Documents

Summary of issues

The submission is dissatisfied with information made available in relation to the following aspects:

- Absence of detail on the plans for illustration of the proposed layout compared to the existing layouts.
- Insufficient numbers of cross-section drawings.
- The methodology used to assess the Level of Service
- Integration with the GDA Cycle Network Plan at Phibsborough.

Responses to issues

The drawings submitted for the Proposed Scheme in Volume 3 of the EIAR are supplemented by a very detailed Table 4-2 in the Preliminary Design Report which lists the existing and proposed widths of the various elements of the road layout at frequent intervals along the Proposed Scheme, which provides full details of the information sought in the submission.

<u>Level of Service Assessment Methodology</u>

As set out in Section 4.2.3 of the TIA (included as Appendix A6.1 in Volume 4 Part 1 of 4 of the EIAR), Level of Service (LoS) concepts are not target based or rigid in their application and bespoke versions are developed to suit the particular receiving environment of the scheme under consideration, or the particular user problems that the scheme and / or project is seeking to address. Further information on the bespoke method of assessment for all modes, where this is appropriate, are set out in Section 6.6.2 of the TIA, including both those for Pedestrian and Cyclists.

Regarding cyclists, the TIA is clear that "*The NTA's National Cycle Manual (NTA 2011) Quality of Service (QoS) Evaluation criteria have been adapted for use in assessing the cycling qualitative impact along the Proposed Scheme*". Scores have been assigned using this method, not using the average or being ranked by worst case. The width of the proposed cycle paths has been considered in the assessment with paths of widths between 1.0m and 1.25m graded as a Level C. The detail of this scoring is set out in the appropriate appendices included in Volume 4 Part 1 of 4 of the EIAR.

In relation to the integration with the GDA Cycle Network Plan at Phibsborough the submission notes the omission of a connection to the proposed orbital secondary cycle route N01/C8 at North Circular Road. The provision of cycling facilities along North Circular Road is being progressed as a separate project by Dublin City Council with the support of the NTA and it is an early design stage. The Proposed

Scheme provides ramp connections from Royal Canal Bank for connection to the North Circular Road consisting of the existing Eglington Terrace link on the northern side and a proposed new ramp on the southern side. Therefore, Proposed Scheme is arranged for full integration with the orbital cycle route at North Circular Road whenever it is developed.

2.10.4 General Comments on the Design

The submission comments on the following aspects of the designs:

a) Side road access.

b) Buffer protection for cyclists.

c) Raised crossings at side roads.

d) Cyclist access to and from cycle tracks.

e) Junction designs.

a) Side Road Access

The submission requests cycle lanes on all approaches to junctions and advance stop line areas ahead of traffic.

Response to issue

The provision of cycling facilities at side roads depends on the context of that side road, and whether segregated cycle lanes are necessary or appropriate. In the Proposed Scheme cycle lanes are provided on the side roads at major junctions where there currently is, or there will be in future, a cycle route as outlined in the GDA Cycle Network Plan. One example is on Ballyboggan Road approaching the junction at Finglas Road.

At minor side roads, mostly in residential areas, there is no requirement for segregation for cyclists on the side road as they are low speed environments with low volumes of traffic where shared use of the street is appropriate. These streets are also generally narrow and cycle lanes could not be accommodated without narrowing the footpaths, which are usually already narrow. In those circumstances it is not proposed to make specific provisions for cyclists on the side road as it is neither necessary, nor appropriate.

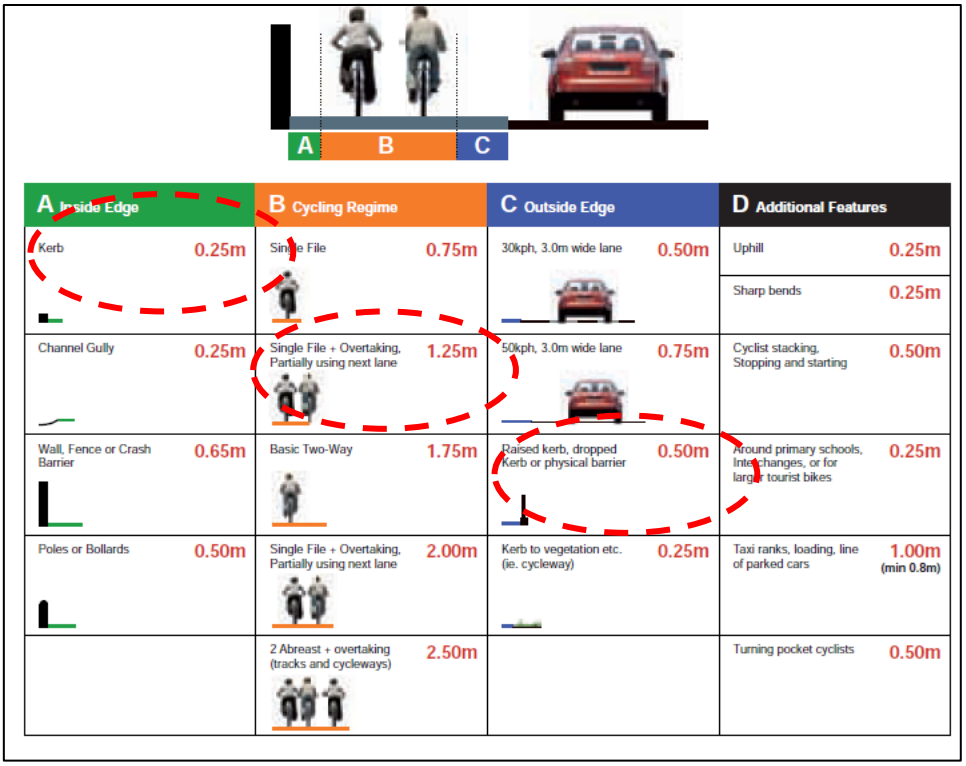
Advance stop line (ASL) areas for cyclists are not provided for in general across the BusConnects CBC schemes as they expose cyclists in front of traffic in the middle of the road. Instead the Proposed Scheme has advance release traffic signals for cyclists with cycle lanes through the junction, and right turn hook pockets as and where appropriate, which are generally better and safer than ASLs.

b) Buffer Protection for Cyclists

The submission seeks inclusion of a 0.75m wide buffer space between cyclists and the bus lane where the speed limit is greater than 50 km/h, which occurs at the northern ends of the Proposed Scheme in Section 1, Ballymun Road north of Santry Cross, and Section 5, Finglas Road north of Wellmount Road. It would also apply for Section 6 and part of Section 7 on Finglas Road as far south as Claremont Court where the speed limit is 60km/h on the Finglas Road dual carriageway, as listed in Table 4-3 in the Preliminary Design Report.

Response to issue

The National Cycle Manual provides information in relation to the typical arrangement for cycle lanes and cycle tracks as set out in Section 1.5.2 (page 12) with a diagram as shown following with the relevant elements of the Proposed Scheme cycle tracks circled.



Width Calculator from the National Cycle Manual

The Proposed Scheme provides the following elements from the width calculator:

A.	Inside Edge:	0.25m	for kerb to verge or footpath
B.	Cycling Regime:	1.25m	for single file + overtaking
C.	Outside Edge:	0.5m	for raised kerb, dropped kerb, or physical barrier
	Total width:	2.0m	

It appears that the Dublin Cycling Campaign has misunderstood the requirement of Column C in the Width Calculator which provides for a cycle lane that does not have a kerb or barrier separator between it and a 3.0m wide traffic lane in a speed limit of 50km/h, for which the Outside Edge of 0.75m width is indicated in the second row of the above table. In fact the 3rd row (circled in red) is applicable for the cycle tracks that are in the Proposed Scheme.

It should also be noted that there are some sections of narrow cycle track proposed along St. Mobhi Road for which the elements from the width calculator are as follows:

A.	Inside Edge:	0.25m	for kerb to footpath
B.	Cycling Regime:	0.75m	for single file
C.	Outside Edge:	0.25m	for kerb to verge
	Total width:	1.25m	

These narrow cycle tracks are included so as to protect and retain the mature plane trees along St. Mobhi Road.

c) Raised crossings at side roads

The submission welcomes the provision of raised crossings across side roads at unsignalised junctions.

d) Cyclist access to and from cycle tracks

The submission seeks clarity as to how cyclists can access the cycle tracks from the opposite side of the road.

Response to issue

On single carriageway streets there will be gaps provided in the kerb along the outer edge of the cycle track to enable cyclists to cross the road to and from each side road junction. On dual carriageways such as Ballymun Road and Finglas Road with longer crossing distances and a median island, it will be safer for cyclists to use the controlled crossings that are provided at regular intervals along the route. So as to provide greater convenience for cyclists, additional road crossings are included in the Proposed Scheme. An example is at Shanliss Road on Ballymun Road where there is no provision for traffic to cross the dual carriageway, but it is proposed to provide a new toucan crossing for pedestrians and cyclists to do so.

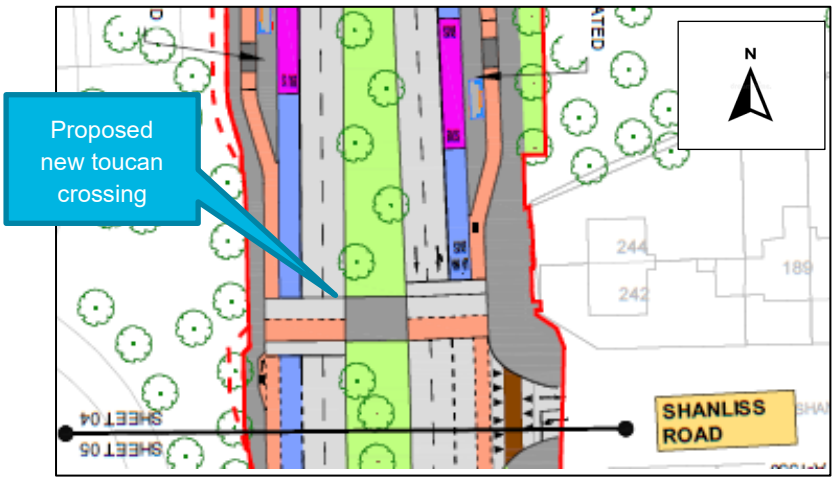


Figure 2-10-1: Extract from Landscape General Arrangement Drawing Sheet 4 on Ballymun Road at Shanliss Road

e) Junction Design

Summary of Issue

The submission raises the same issues as those in the Dublin Commuter Coalition about the general principles for cycling facilities at junctions.

Response to Issue

Please refer to the earlier response to the submission from the Dublin Commuter Coalition on this issue.

f) Minimum Width for Cycle Tracks 2m

The submission seeks provision of 2.5m wide cycle tracks instead of 2m wide cycle tracks generally to allow for two abreast cycling and overtaking. It also highlights one particular location on Finglas Road where it says that the proposed cycle track is indicated as only 1.45m wide on Sheet 32 of '02. General Arrangement' drawings in Volume 3 of the EIAR.

Response to issue

Section 5.3 of Appendix A4.1 PDGB in Volume 4 Part 1 of 4 of the EIAR states the following:

> *'The minimum width is 1.5m, which, based on the National Cycle Manual (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).'*

The provision of 2m wide cycle tracks widely across the Proposed Scheme is a significant improvement from the typical 1.25m to 1.5m wide cycle lanes and cycle tracks that they will replace. There are significant constraints on the existing streets where the improved and new cycle tracks are to be provided, and The proposed design distributes the available space across all of the modes to achieve a balanced approach while also prioritising the sustainable transport mode. Traffic lanes have been reduced throughout the proposed scheme to the absolute minimum width of 3.0m so as to provide additional space for other road users. In some very constrained places, it has also been necessary to narrow existing footpaths to the minimum width of 1.8m to accommodate cycle tracks. On balance therefore, the provisions for cyclists in the Proposed Scheme are the maximum that can be achieved in the context of retrofit onto the existing streets. Experience elsewhere in Dublin has demonstrated that 2m wide cycle tracks

provide a very satisfactory facility for the increasing numbers of cyclists with comfortable overtaking possible within the cycle tracks, which is a major improvement.

In the specific location on Finglas Road south of the Old Finglas Road junction on the eastern side of the road, it is not appropriate for the submission to be based on a digital width measurement of the plan drawing. Instead the true proposed widths of all elements of the cross-section are listed in Table 4-2 on page 43 of the Preliminary Design Report (Supplementary Information), which states that between Ch.B-2450 to B-2680 the proposed cycle track is 2.0m wide alongside a 2m wide footpath on the southbound (eastern) side of the Finglas Road.

g) Specific Comments: Sections 1 and 2 Ballymun to Hart's Corner

30km/h speed limit in Ballymun

The submission welcomes the proposal for a 30 km/h speed limit on a section of Ballymun Road through the town centre but suggests that it should be extended.

Responses to issue

The proposed lower speed limit will apply to the Main Street area in Ballymun where the road will be reduced to a single traffic lane in each direction, and on-street parking will be provided that will act as a buffer zone between the cycle track and the bus lane, with new street trees planted at close intervals along the street edges. This follows the guidance in the *Design Manual for Urban Roads and Streets* (Table 4.1) which indicates a speed of 30-40 km/h on arterial routes in the "Centre" context, but 40-50 km/h in the "Suburban" context, which applies on Ballymun Road outside of the town centre zone between Shangan Road and Gateway Crescent. It would therefore not be appropriate to extend the 30 km/h speed limit beyond the extents shown in the Proposed Scheme.

Buffer Zone

It is suggested that a planted buffer zone should be provided between the cycle track and the bus lane generally along Ballymun Road, with reduction of the central median.

Response to issue

To provide planted buffer zone all along Ballymun Road would involve major works that would not be justified in the context of the objectives of the BusConnects project. There are two lines of existing street trees in the median island on Ballymun Road, and if the median were narrowed those trees would need to be removed and replaced, which would have a significant negative visual impact in an area that has been subject to urban regeneration in the recent past.

Pedestrian Crossings

The submission welcomes the proposed additional pedestrian crossings on Ballymun Road.

Response to issue

It should be noted that all crossings will be toucan crossings for use by cyclists as well as pedestrians.

Griffith Avenue Gyratory

The submission questions why consideration was not given to the closure to southbound general traffic of the St. Mobhi Road leg of the triangular traffic gyratory system.

The submission also queries the proposed cycle track widths around the gyratory system.

Response to issue

This idea is unworkable at one of the most significant junctions in Dublin where a major radial road intersects a major orbital road. To close the northern end of St. Mobhi Road to general traffic would also close the whole route towards the city centre in the southbound direction, which would cause major displacement of traffic eastwards to the Swords Road and westwards to the Finglas Road with very significant impacts along those routes. This would not be justified in the context of the objectives of the BusConnects project as there is sufficient bus priority along St. Mobhi Road with a southbound bus lane, which will be extended to the stop line at Griffith Avenue in the proposed scheme.

The basis for the proposed cycle track widths in general has been previously addressed in this response document. Most of the single direction cycle tracks will be 2m wide on Ballymun Road and Griffith

Avenue in this area, and there is also a proposed section of 2-way cycle track to cater for cyclists from a local primary school. As on the rest of St. Mobhi Road it was necessary to provide a narrow 1.25m wide cycle track along St. Mobhi Road to enable retention of the mature street trees on the eastern side.

St. Mobhi Road to Botanic Road

The submission extends the argument for St. Mobhi Road to be closed to southbound traffic south of Griffith Avenue to provide more space for wider cycle tracks.

Response to issue

This suggestion has already been explained as unworkable. It should be noted that in the southbound direction it is proposed to widen St. Mobhi Road on the eastern side over a length of 350m to provide a 2-way cycle track in front of Na Fianna GAA Club and the Home Farm football pitch. This means that southbound cyclists will have a wide cycle track over 40% of the length of this road and will have to pass along a narrow cycle track over two sections of 400m and 300m length, which will each take only about 2 minutes of travel time. In the slower uphill northbound direction, cyclists will have the choice of two parallel cycle routes along both St. Mobhi Road and along Botanic Road / Glasnevin Hill / Ballymun Road, which is a doubling of the existing route capacity.

Botanic Road to Prospect Way

The submission acknowledges the severe constraints on this section of street and supports the design option chosen.

Response to issue

None required.

h) Specific Comments: Sections 3 & 4 – Prospect Way/Hart's Corner to the River Liffey

Summary of issues

The submission contains the following issues:

- Hart's Corner Gyratory
- Cycling facilities in Phibsborough
- The Markets Cycle Route

Hart's Corner Gyratory

The submission broadly welcomes the Proposed Scheme arrangements and notes that the phasing of traffic signals will be critical.

Response to issue

Overall the signal staging will be quite simple with some degree of coincidental movements where they do not conflict. For example the southbound traffic turning right from Prospect Way can run at the same time as the cycle crossings. Traffic movements only require two signal stages overall, and the three pedestrian crossings will all run together while traffic and cyclists are stopped.

Phibsborough

The submission objects to the absence of cycle tracks along Phibsborough Road.

Response to issue

The constraint of the limited road width along Phibsborough Road is addressed in Section 3.3.3 (on Page 27) of Chapter 3 (Consideration of Reasonable Alternatives) in Volume 2 of the EIAR, , and in the Preferred Route Option Report in the Supplementary Information, summarised as follows:

> *"Through Phibsborough, along R108 Phibsborough Road over a length of 1.1km from the Royal Canal to R135 Western Way, the street is too narrow to accommodate both bus lanes and cycle tracks. The option of a three-lane layout with discontinuous bus lanes and bus priority signal control was considered, but this would have introduced greater risk for reliable bus operations. Instead, there is a suitable parallel cycle route, just 100m to the east of R108 Phibsborough Road,*

along Royal Canal Bank which will cater for the majority of cyclists along the corridor. It will link towards the City Centre via Geraldine Street and Blessington Street, or via R135 Western Way to Bolton Street. For local cycle trips it will be necessary to share the bus lanes through Phibsborough in a suitably low-speed 30km/h (kilometres per hour) environment."

Cyclists can use the bus lanes through Phibsborough, where a 30 km/h speed limit will apply. Where there are short gaps in the bus lanes at particularly narrow sections of the streets, linking cycle tracks are provided so that cyclists will have a continuous facility that does not require use of the general traffic lane at any point. This arrangement is the best that can be achieved, and it provides a reasonable balance overall with two alternative routes available for cyclists through Phibsborough.

The GDA Cycle Network Plan anticipated the challenges in Phibsborough and did not indicate Primary Route 3 along Phibsborough Road as described by the submission by the Dublin Commuter Coalition. Route 3 is clearly indicated along Royal Canal Bank, with no cycle route along Phibsborough Road.

Figure 2-10-2: Extract of GDA Cycle Network Plan at Phibsborough

The submission also queries the extents of the proposed 30 km/h speed limit along Phibsborough Road. The proposed lower speed limit will apply to the urban village centre along Phibsborough Road from Connaught Street at the northern end to Monck Place at the southern end, which is where the businesses and services are concentrated. This follows the guidance in the *Design Manual for Urban Roads and Streets* (Table 4.1) which indicates a speed of 30-40 km/h on arterial routes in the "Centre" context, but 40-50 km/h elsewhere which applies on Phibsborough Road outside of the village centre zone. It would therefore not be appropriate to extend the 30 km/h speed limit beyond the extents shown in the Proposed Scheme.

Royal Canal Bank

The submission welcomes the proposal for the *Royal Canal Bank* quiet streets cycle route, but it notes the absence of specific traffic calming measures and observes that some through traffic passes through this residential area to link between North Circular Road and Phibsborough Road.

Response to issue

The existing streets along the proposed cycle route are very narrow with on-street parking and very limited traffic movements due to the largely local access only nature of the area. It is possible for traffic to follow a very convoluted route through the area from North Circular Road by turning left onto Berkely Road, right into Geraldine Street, left onto Royal Canal Bank, right into White Lane, and then left onto Phibsborough Road. This route is longer than the simple left turn from North Circular Road at Doyle's Corner, involving 5 separate turns at junctions, and passes along sections of street that are only wide enough for single-file traffic and where delay would occur in the event of meeting an oncoming vehicle. As a result very little traffic may be observed taking this "long-cut" route. In the development of the Proposed Scheme there was no need identified for relevant traffic calming measures along the proposed cycle route through this quiet residential area.

Air Quality at Bus Lanes

The submission raises the issue of poor air quality on the bus corridor which would affect cyclists sharing the bus lanes.

Response to issue

This concern would apply across the whole of the Proposed Scheme whether cyclists are in the bus lane, or on a cycle track beside it.

Chapter 7 (Air Quality) in Volume 2 of the EIAR considered the potential air quality impacts associated with the Operational Phase of the Proposed Scheme. The assessment determined that the Operational Phase of the Proposed Scheme will generally have a neutral impact on air quality, and as a result no mitigation or monitoring measures are required. Whilst not a mitigation measure as such, it is noted that in time, vehicle emissions technology will improve, and the Irish vehicle fleet will continue to evolve to the extent that vehicle emission impacts associated with the Proposed Scheme are anticipated to decrease. City wide traffic management measures and proactive encouragement of low emissions vehicle uptake will accelerate these improvements. In addition, ongoing improvements in technology has been reducing emissions from the bus fleet, which will eventually be removed entirely when the fleet is electrified in due course.

Links to the west for cyclists are raised in the submission. These links are available from the proposed Royal Canal Way Cycle route via Kelly's Lane that connects to Phibsborough Road and then into Monck Place for example, as well as along North Circular Road where cycle tracks are to be developed separately by Dublin City Council in line with the GDA Cycle Network Plan.

Markets Cycle Route and Church Street

The submission describes the proposed quiet streets cycle route through the Markets Area as a "convoluted unattractive route" which would require traffic management measures that are absent from the Proposed Scheme.

Response to issue

The proposed route is 0.8km long and is mainly straight along most of the length, with a short dog-leg at each end. It is just 100m longer than the direct route along Church Street from the King's Inns to the River Liffey. The main attraction of this route is that it passes through several cul-de-sac residential streets that are very quiet, and it will bring cyclists directly past the historic Victorian Fruit & Vegetable Market building which is proposed to be redeveloped as a major destination and attraction. Anne Street North and St. Michan's Street are very quiet streets in the middle of the Markets Area that carry very little traffic as they do not provide a through route of any purpose. These streets require no interventions to cater for increased numbers of cyclists in a low-speed environment.

At the southern end of the proposed cycle route through the Markets Area, it is only 20m distance westwards to O'Donovan Rossa Bridge over the River Liffey. It is expected that the proposed Liffey Cycle Route scheme can consider the issue of north-south connectivity across the river and linked into the Markets Cycle Route.

The broader context for the planning of cycle routes in this area if the city the relevant part of the GDA Cycle Network Plan is shown in Figure 2-10-3. This indicates no cycle route along Church Street, despite the assertion in the submission in the Dublin Cycling Campaign that this is the case.

Figure 2-10-3: Extract of GDA Cycle Network Plan at The Markets Area

Cross-City Route C6 is shown on the network plan to run along Greek Street and Beresford Street to the east of Church Street through the western edge of the Markets Area. This proposal was in recognition that it would not be feasible to provide suitable separate cycling facilities along narrow Church Street which also has to cater for bus priority on a major traffic route. Upon review for the Proposed Scheme it was found that Greek Street and Beresford Street is also a fairly busy northbound traffic route that links from Winetavern Street to North King Street, avoiding the busier Church Steet as an orbital route around the western side of the city centre. A much more attractive route for cyclists is available one block further east along St. Michan's Street and Anne Street North, and that route was adopted in the Proposed Scheme as a preferable alignment than then one shown on the GDA Cycle Network Plan.

In the Proposed Scheme it was recognised that some cyclists would still choose to follow Church Street, and therefore some short sections of cycle track are included to link between the sections of bus lanes. This proposal goes beyond the provisions of the GDA Cycle Network Plan by providing a second north-south cycle route in this part of the scheme.

i) Specific Comments: Sections 5, 6 & 7 – Finglas to Hart's Corner

Summary of issue

Sheet 27 of the '02. General Arrangement' drawings in Volume 3 of the EIAR, for Finglas Road at Church Street, differs from Image 4.10 in Chapter 4 (Proposed Scheme Description) in Volume 2 of the EIAR that shows the proposed public realm at the junction of Finglas Road and Church Street.

Response to issue

There is a minor discrepancy between Sheet 27 of the '02. General Arrangement' drawings in Volume 3 of the EIAR and Chapter 4 (Proposed Scheme Description) in Volume 2 of the EIAR that shows the proposed public realm at the junction of Finglas Road and Church Street. The Proposed Scheme is

shown in full on the General Arrangement drawing, which differs from the public realm image in that it includes cycle lanes connecting across Finglas Road from the western side to Finglas Village on the eastern side, with traffic signal control across the Finglas Road dual carriageway. To accommodate the additional at-grade cycle crossings the proposed bus stop was moved a little further north. These additional details are not shown on the image for the public realm in this vicinity beside the historic St. Canice's Church.

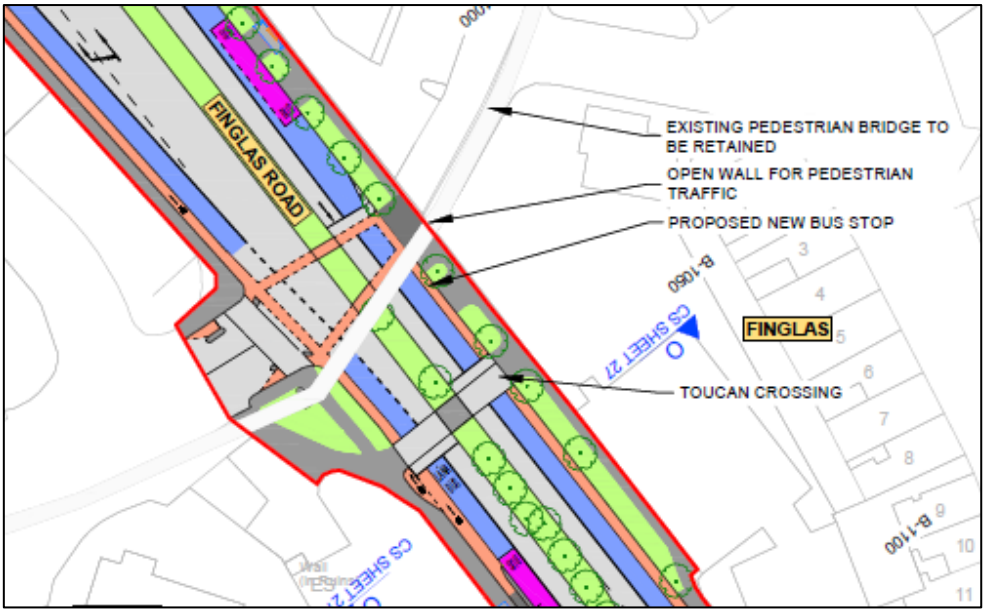


Figure 2-10-4: Extract from General Arrangement Sheet 27

Summary of issue

The submission queries the narrow cycle Track widths from Wellmount Road to Hart's Corner

Response to issue

Along Finglas Road a key concern in the scheme design was to retain the existing trees in the verges along both sides of the dual carriageway. The relevant section of Chapter 4 (Proposed Scheme Description) in Volume 2 of the EIAR that describes this aspect of the Proposed Scheme is as follows, and as illustrated on Cross-Section P-P shown in Figure 2-10-5.

> ***4.5.6.2 Deviations from Standard Cross Sections in Section 6***
>
> *The width of the cross-sectional elements, as outlined in Section 4.6.1 have been reduced at a number of constrained locations across the Proposed Scheme. The proposed 2m wide cycle tracks in Section 6 will largely fit within the existing carriageways that will be narrowed from 7.5m to 6m and will extend for 0.5m into the grass verges on the outer sides of the road. The cycle tracks will be narrowed locally from 2m to 1.5m to enable the existing trees in the verges to be retained.*

This explains that the cycle tracks will be mostly 2m wide, but there will be some local narrowing required when it passes the existing trees, which are typically at 15m intervals. Overtaking is most likely to be required in the slower uphill direction, and this can take place in the gaps between the trees.

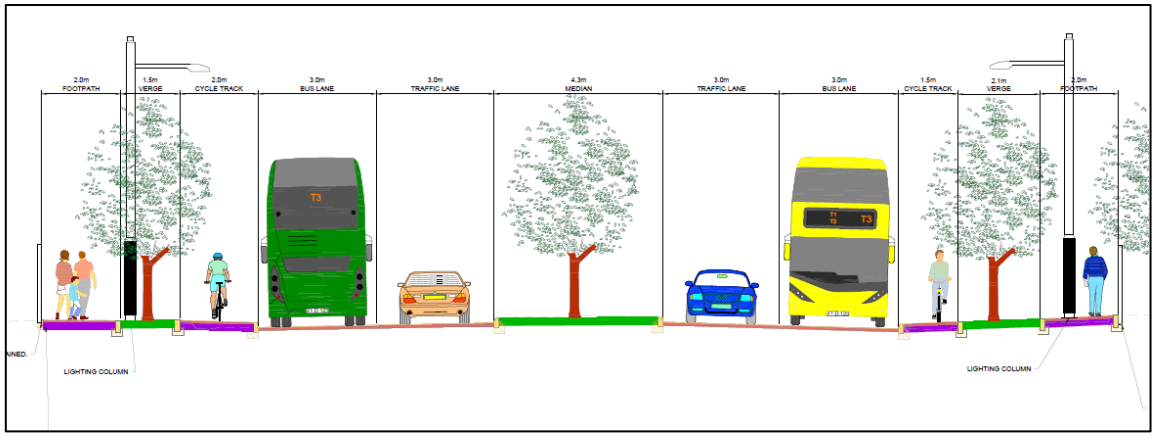


Figure 2-10-5: Cross Section P-P from General Arrangement Sheet 28

2.11 Dublin City Council

Dublin City Council's (DCC) submission comprises 73 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 2.4.12)

C5 – Response to Section 2.5 Conclusion

C6 – Response to Appendix to DCC Submission

2.11.1 Introduction

The Ballymun / Finglas 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.

2.11.2 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 Ballymun / Finglas 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.

2.11.3 B - Dublin City Council support for the Proposed Scheme

In its submission, DCC confirms its support for the Proposed Scheme, and state in their conclusion (Section 2.5 on page 61 of the submission) as follows:

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

DCC further confirms (at page 61 of its submission) that the development of the Proposed Scheme will provide an upgraded and expanded bus network and quality of service together with better quality cycling and pedestrian facilities, and DCC acknowledges that these improvements will make it easier for people to access and use public transport. It also acknowledges that the Proposed Scheme will, in turn, promote modal shift from the private car to more sustainable forms of transport including walking, cycling and public transport, ultimately contributing to the creation of a greener and more sustainable city.

In relation to planning policy, the NTA welcomes the acknowledgement by DCC (at page 19 of its submission) that, in terms of Regional Policy, the Proposed Scheme is supported by the Regional Spatial and Economic Strategy (RSES) and that DCC is of the view that the Proposed Scheme will contribute to, and support, continued improved integration of transport with land use planning and the delivery of improved high-capacity Core Bus Corridors will enable and support the delivery of both residential and economic development opportunities, facilitating the sustainable growth of Dublin City and its metropolitan area, not only seeking an improved and enhanced bus network but also places cycling at the core of its transport objectives.

In relation to the Dublin City Development Plan 2016-2022, the DCC submission (page 9) confirms that the development plan: *"recognises the need for an efficient, integrated, and coherent transport network as a critical component of the Development Plan's Core Strategy"*. It goes on to state: *"[t]he City Council* supports *the improvement of public transport and cycling which will allow for higher density development, thereby creating a more sustainable interaction between land-use and transport."*

Equally, on page 22 of its submission, DCC notes that the Proposed Scheme will help to achieve the strategic objectives envisaged in the forthcoming Dublin City Development Plan 2022-2028 pertaining

to: compact growth; sustainable mobility and permeability; and place making, while significantly contributing towards climate action.

In relation to the EIAR, DCC states (at page 19 of its submission) that: *"A comprehensive EIAR has been submitted with the application examining the project under all relevant headings and finds generally that the development would not adversely impact on existing environmental amenities"* and they go on to say, on page 20, that *"the content [of the EIAR] points generally to the development having negligible impact on the existing environment".*

In relation to the NIS, DCC states (at page 21 of its submission) that the Natura Impact Statement submitted is generally satisfactory in terms of identifying the relevant European sites and the potential adverse impacts on the integrity of designated European sites along the Dublin coastline in view of their conservation objectives. DCC go on to state in its submission that: *"the avoidance, design requirements and mitigation measures set out in the NIS will ensure that any impacts on the conservation objectives of European Sites will be avoided during the construction and operation of the proposed scheme such there will be no adverse effects on any European Sites."*

DCC also observes (on page 20) that: *"it is noted that the Natura Impact Statement objectively concludes, following an examination, analysis and evaluation of the relevant information, including in particular the nature of the predicted impacts from the proposed scheme, and subject to the implementation of the identified mitigation measures, that the proposed scheme will not adversely affect (either directly or indirectly) the integrity of any European Site, either alone or in combination with other plans or projects."*

In relation to zoning, the NTA notes that DCC sets out the view on page 22 of its submission that, "*public service installations*", which includes bus shelters, are compatible with the Z1, Z2, Z3, Z4, Z6, Z9 and Z10 zones along the Proposed Scheme.

On page 22 of its submission, in relation to amenities, DCC states: *"Dublin City Council is satisfied that the elements of the proposed scheme which fall within the administrative area of the Council would not have any excessive or undue impact on the amenities of the area".*

In fact, DCC goes on to state (at page 22): *"Once complete, the proposed scheme will create attractive, functional and accessible places for people alongside the core bus and cycle facilities which will enhance the amenities of the area."*

The Environmental and Transportation Department of DCC set out (at page 23 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* current *and forthcoming Dublin (City) Development Plans".*

DCC states further that, *"[t]he commitment by the NTA within the BusConnects project to 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 24 of its submission, DCC states: *"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 16 of the DCC submission, the Roads Division states: *"BusConnects proposes substantial improvements to bus and cycling infrastructure with provision pf additional signalised crossings for pedestrians along the routes".*

At page 37 of its submission, DCC Archaeology Section notes the assessment and mitigation measures proposed in the EIAR

On page 54 of the DCC submission, the City Architects Division says "*public realm improvement works are welcome to these areas…"* with reference to a list of 10 locations that are included in the proposed scheme.

2.11.4 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 the proposed improvements to public transport in support of the shift to sustainable mobility, DCC has also raised certain queries and observations that the NTA has considered and responds to below in the next section of this report.

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, lists 10 planning applications along, and adjacent to, the Proposed Scheme. The NTA notes that 1 of the 10 planning applications listed is identified in the application documentation – namely EIAR Volume 4 Appendices Part 1 of 2, 04. A2.1 Appendix 2 Planning Report, Table 2.1 as set out below:

- **Corner of Church Street Upper and Brunswick Street North:** application for the construction of 52 residential units (each with private balcony/terrace) within three apartments blocks ranging from 3 to 8 storeys (Reg. Ref.:3361/22, ABP-314691-22).

The other planning applications that DCC refer to are:

- **Daneswell Place, former Printworks/Smurfit Site, Botanic Road, Glasnevin, Dublin 9**: Permission granted for 168 no. apartment units. (LRD6001/22-S3A).
- **Ballymun Civic Plaza, Shangan Road, Ballymun, Dublin 11:** development to improve the public realm. (Part 8 Proposal 3131/22 (LAW)).
- **364-374 North Circular Road, Royal Canal Bank and 168-169 Phibsborough Road (former Des Kelly site):** mixed use development with two retail units, coffee shop and 80 apartments ranging in height from three to eight storeys. (Reg. Ref.: 4145/22)
- **Phibsborough Shopping Centre***:* Build To Rent Shared Accommodation and other minor alterations to the permitted development. (SHD0028/20 (ABP-30887S-20)).
- **Old Bakery Site 113 Phibsborough Road, Cross Guns Bridge, Phibsborough:** 205 No. Build to rent units. (SHD0004/21 (ABP-30934$·21)).
- **146-147 Phibsborough Road & 10 Eglinton Terrace, Dublin 7**. mixed-use block consisting of a restaurant & cafe space and 17 No. apartments in 2.No blocks of six storeys. (3391/20 (ABP-310686-21)).
- **Dominick Street Upper**: 6 storey over lower ground floor/basement level student accommodation development with 247 no. bed spaces. (2080/17 58-64).
- **North Circular Road, Dublin 7**: student accommodation development with 444 no. bedspaces (420 bedrooms) in 9 no. blocks which range In height from 1 no. storey to 7 no. storeys. (4262/16 (PL29N.248726) 274).
- **27-31 Church Street, Dublin 7**: student accommodation with 232 no. bedrooms. (2990/14 (Pl29N.244466)).

The NTA confirms its awareness of these planning permissions, which have been into taken account in the development of the Proposed Scheme. None of the proposed developments are affected by the Proposed Scheme, or vice-versa.

It should be noted that from a Traffic / Transportation, Air, Noise, etc. perspective, individual developments are generally not utilised in the assessment processes and, instead, general growth and

major infrastructural development are appropriately considered and evaluated. The planning data which underpins the traffic modelling for the Proposed Scheme has been derived from the National Development Forecasting Model which accounts for the growth in population and employment across the GDA at an aggregate level for the assessment years 2028 and 2043. This growth is informed by regional growth projections and local development planning data.

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 2, 01. A2.1 Report Planning Report for the Proposed Scheme.

Further, some additional observations by DCC over and above those already provided within Table 3.8 of the Planning Report in relation to the Dublin City Development Plan 2016-2022 are welcomed, including that the Proposed Scheme is consistent with Policy MT2 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.

The DCC submission references several Strategic Development and Regeneration Areas including SDRA 2 Ballymun, SDRA 8 Grangegorman / Broadstone, and a new SDRA for Finglas Village, all of which are located on or beside the core bus corridor in the Proposed Scheme.

2.2.2.1.2.1 Ballymun Local Area Plan 2017

The DCC submission summarises relevant planning policies in the Ballymun Local Area Plan (2017) on pages 11 to 14 which includes Objective M02 for enhanced and segregated cycle facilities along Ballymun Main Street, and M03 for a core bus corridor through Ballymun, both of which are addressed by the Proposed Scheme.

The further commentary focusses mainly on issues of parking, pedestrian space, landscaping and materials for which responses are provided in the following sections.

Description of Proposed Scheme at this Location

The proposed scheme at the northern end and through Ballymun town centre is illustrated on the Landscape General Arrangement Drawings in EIAR Volume 3, Part 5, Sheets 1 to 4.

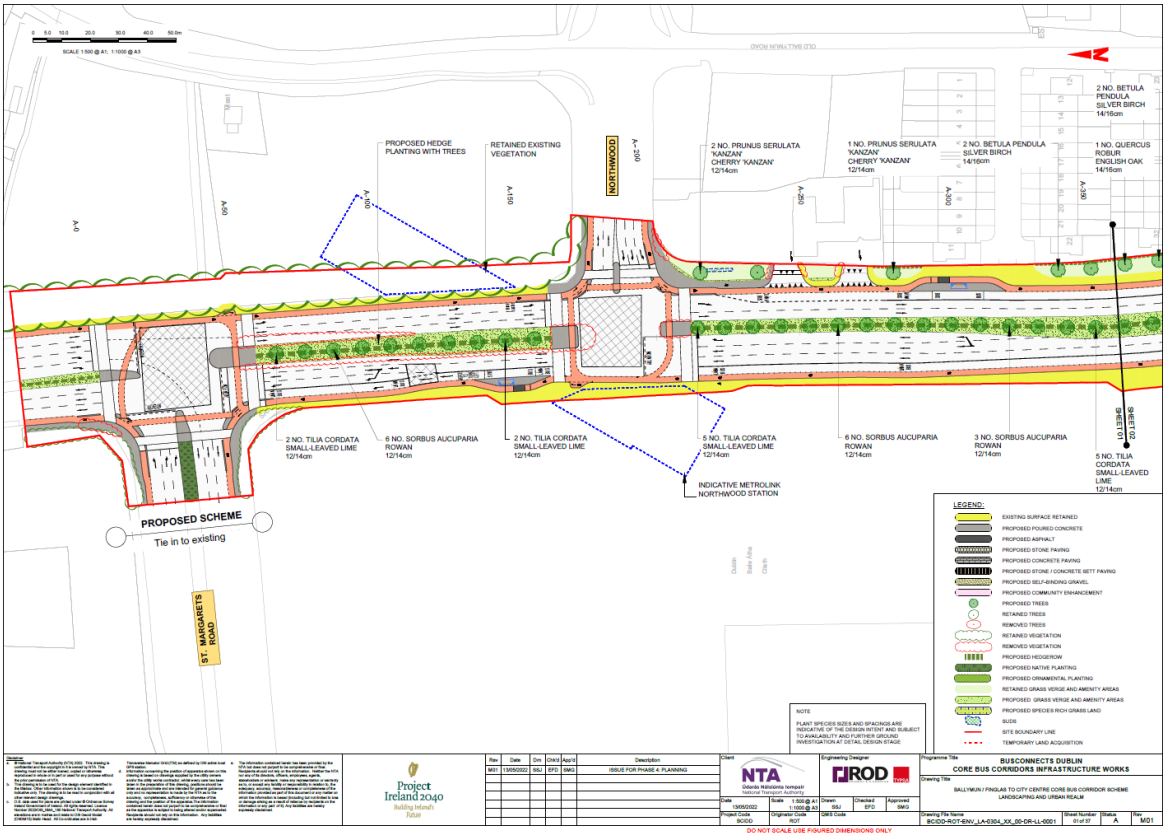


Figure 2.11.1: Landscape General Arrangement Drawing Sheet 1 at Ballymun

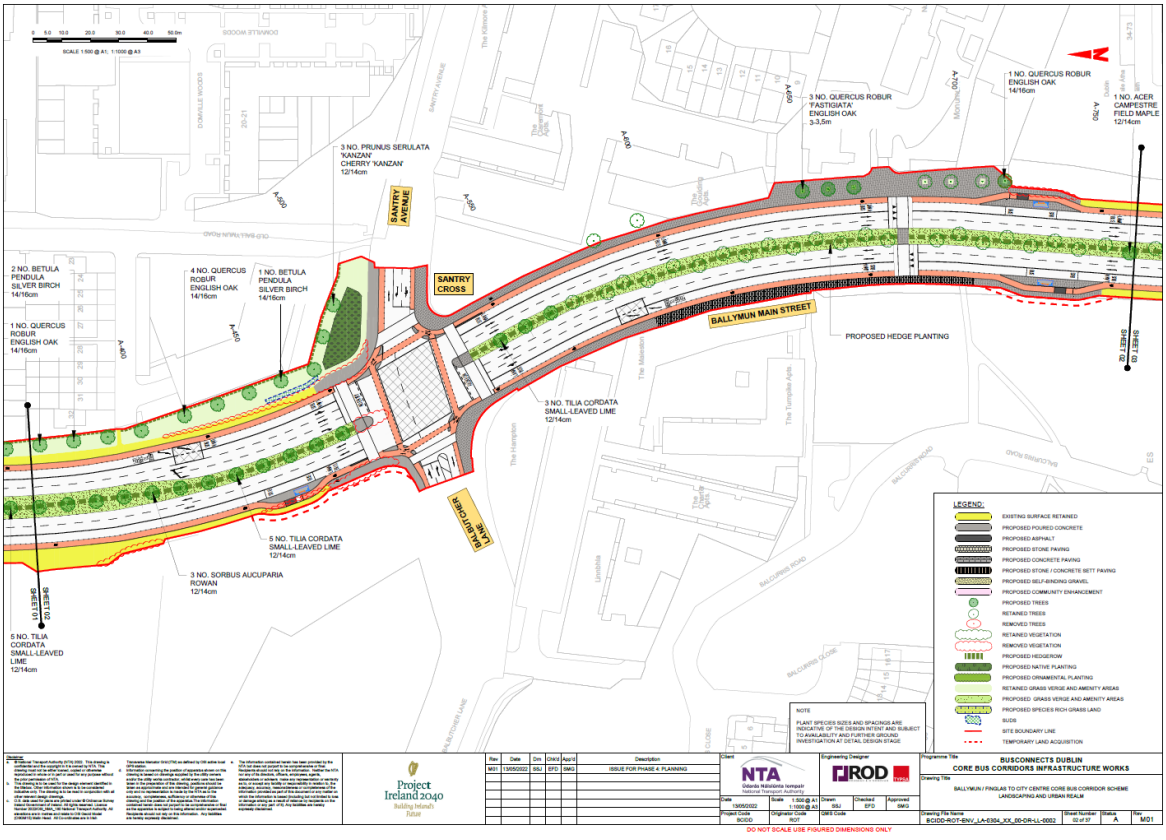


Figure 2.11.2: Landscape General Arrangement Drawing Sheet 2 at Ballymun

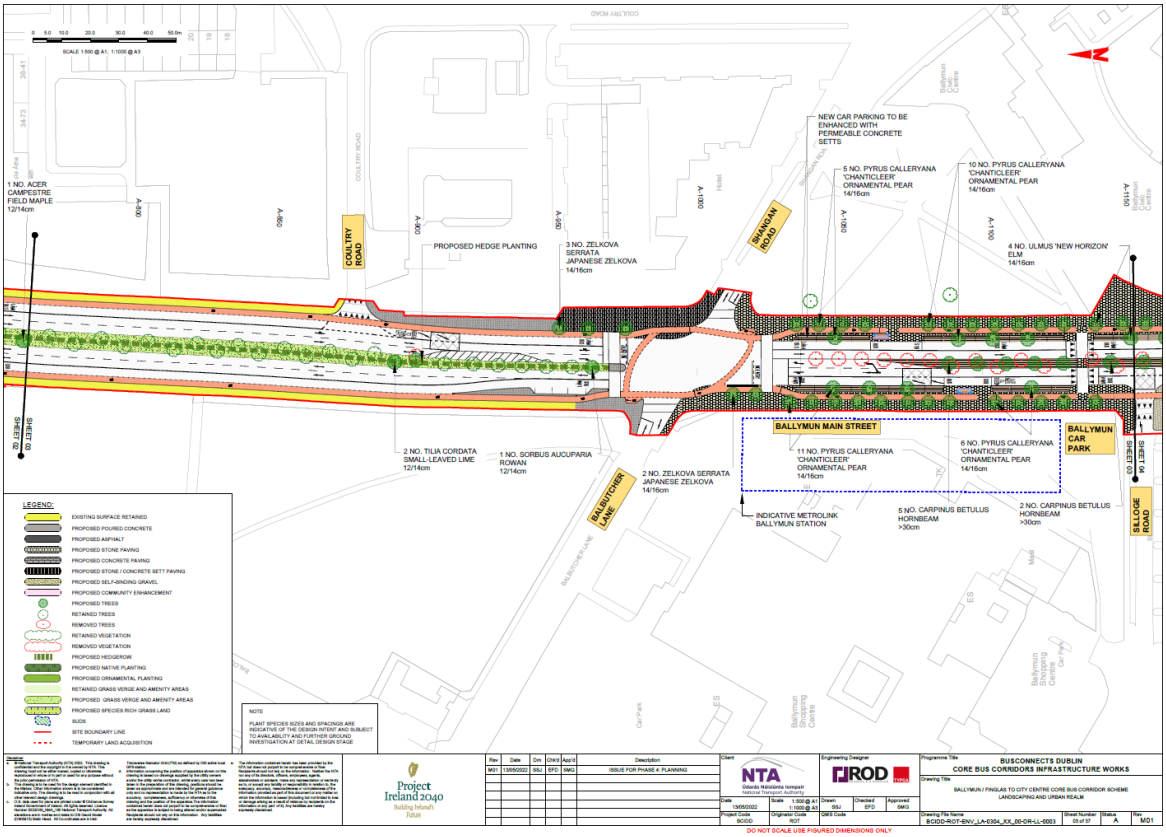


Figure 2.11.3: Landscape General Arrangement Drawing Sheet 3 at Ballymun

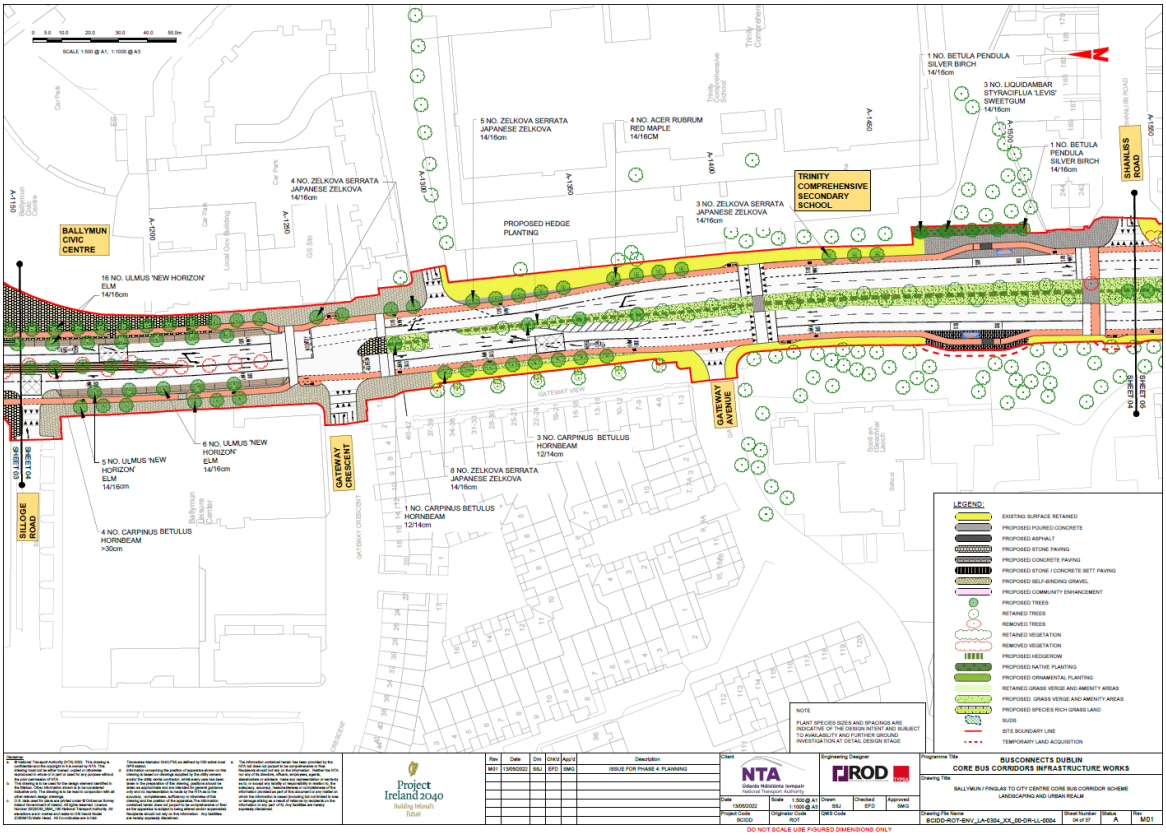


Figure 2.11.4: Landscape General Arrangement Drawing Sheet 4 at Ballymun

Issues Raised in DCC Submission for Ballymun LAP

The submission by Dublin City Council raises a number of issues as follows:

> *" the proposed removal of on-street parking on either side of Main Street, to the south of Santry Cross and the lack of alternative provision in this location is considered detrimental to the existing and future commercial uses south of Main Street. "*
>
> *"Conversely, the proposed provision of significant new car parking between the Plaza, Cearnóg an tSeachtar Laoch and the old Shopping Centre site (Site 1 of the LAP) is considered at odds with the urban design objectives for this location."*
>
> *"The over-provision of car parking at this particular location, as proposed, would seriously detract from the creation of a pedestrian-focused civic space."*
>
> *" the proposed tree line colonnade on either side of Main Street, as proposed for the southern portion of Main Street, should be extended north through the scheme, to the northern end of Main Street as a minimum, and preferably as far as the M50, as sought in the LAP objectives"*
>
> *"New public footpaths should be permanent and constructed using the same materials as already in place (e.g. Shannon paving and marshal curbs)".*

Responses to Issues Raised in DCC Submission for Ballymun LAP

Parking

The DCC submission is somewhat contradictory in that it is concerned about the removal of parking in one part of Ballymun Main Street, and about the provision of new parking in another location on the same street. The BusConnects proposals were developed in general on the principle of the hierarchy of provision for pedestrians, cyclists and public transport, with retention of existing street parking where possible and appropriate, so as to limit potential negative impacts for the adjoining land-uses. On Ballymun Road there is a limited amount of existing parking at irregular intervals along the street. Most parking is provided on side streets, or within multi-storey buildings. It is expected that further development of the remaining vacant lots along the street will be self-contained for parking in accordance with the relevant planning policies.

Just south of Santry Cross there are 11 existing parking spaces in 4 pockets indented into the footpaths on each side of the street. These parking bays cut into the wide footpath which is reduced to less than 2m width in some places as shown in Figure X. The need for these isolated parking spaces appears very limited, especially with little by way of active frontage and extensive off-street parking nearby. The BusConnects scheme proposals will provide an improved environment for pedestrians with a continuous 4m wide footpath along Ballymun Road and will remove the parking laybys that are of little value and form significant intrusions into the pedestrian environment. This will also eliminate interactions between vehicle movements to and from the parking spaces across the proposed cycle tracks which will have safety benefits for cyclists.

Figure 2.11.5 - Existing Parking Bay on Ballymun Road

In the heart of Ballymun town centre there is part-time on-street parking on the eastern side along part of the street. This is a busy location with extensive active frontage, and the parking is intensively used. There is no corresponding parking on the western side of the street, but vehicles do park in the bus lane sometimes. The existing conditions on Ballymun Main Street were considered in the Preferred Route Option Report Section 6.1.1.2. The DCC submission notes the following:

> *"Concerning car parking provision along Main Street and Objective MO5 above, it is acknowledged that the provision of a multi-storey car park is clearly outside the remit of this project, however, there is a need to ensure that there is some level of parking to serve the commercial Main Street, to support the economic viability of existing and future commercial, recreational and cultural uses, and aspirations to create Ballymun as a destination point, in keeping with its District Centre status under the City Development Plan."*

The Proposed BusConnects Scheme will retain parking in the heart of Ballymun town centre as highlighted by DCC. In this regard the Proposed Scheme will secure the necessary level of bus priority through upgrade of the southbound bus lane to continuous operation instead of part-time operation by moving the existing parking into a separate layby. The situation on the western side of the street will also be improved by removal of the risk of illegal parking in the bus lane through provision of a separate parking layby. These interventions will contribute significantly to the objectives of the Local Area Plan for Ballymun by narrowing the street with a lower speed limit of 30 km/h and shorter pedestrian crossings, as well as extensive planting of new street trees.

Street Trees

The submission by DCC seeks for the proposed "tree lined colonnade" on either side of Main Street to be extended north preferably as far as the M50. It is encouraging that DCC welcomes this aspect of the proposed scheme and aspires to have it extended. The BusConnects proposals for additional street trees are focussed on those parts of the street where there is space available for additional tree planting as follows:

a) Where an existing traffic lane will be removed to accommodate parking laybys with new street trees planted at regular intervals between pairs of parking spaces, along the section between Shangan Road and Gateway Crescent. This part of the street has fully developed building frontage.

b) At a few locations between Shangan Road and Santry Avenue on the eastern side where the road boundary steps back, and the footpath is considerably wider.

c) Between Santry Avenue and near the northern limit of the proposed scheme at Northwood Avenue on the eastern side where the road boundary steps back and there is a wide verge area behind the footpath.

Elsewhere along the street on the western side there is no frontage development yet, and the footpath is of modest width. There is potential as part of the further development of these empty land plots in Ballymun for additional street tree planting to be provided in conjunction with a new street frontage, but it would be premature for this to be included in the proposed BusConnects scheme.

Paving Materials

In the Proposed Scheme a review was undertaken of the entire route in terms of hierarchy of place to identify key civic focal points that should have a high-quality urban realm treatment. This analysis took place across all of the Core Bus Corridor schemes to ensure a consistent approach to public realm. On the Ballymun-Finglas scheme the key civic focal points that were identified included Ballymun town centre extending from Gateway Crescent at the southern end to Shangan Road at the northern end. This section of street already has moderately high-quality paving and street trees planted along the median island of the dual carriageway street.

The Proposed Scheme will provide new stone street paving in the heart of Ballymun town centre that is of a higher quality than the existing concrete paving materials. This is consistent with the general proposal for paving of the highest quality along the proposed core bus corridors within the BusConnects network. Elsewhere along the route the paving will be of similar quality to the existing paving. In this regard the proposed BusConnects scheme goes beyond the objectives of DCC.

2.2.2.1.2.2 Finglas Strategy 2021

The DCC submission notes that the Draft Dublin City Development Plan 2022-2028, (adopted in December 2022), includes a new Strategic Development and Regeneration Area (SDRA) for Finglas Village and its

environs, Informed by the Finglas Strategy. It includes provisions for enhancing the urban form and streetscape in the village and measures to improve pedestrian movement and accessibility.

Issue Raised in DCC Submission for Finglas SDRA

The DCC submission notes that the Proposed Scheme includes a new toucan crossing on Finglas Road to connect the two sections of Church Street that are severed by the Finglas Bypass on the western side of the village where there is an existing footbridge. DCC states that the Finglas SDRA includes the following "guiding principle":

> *"the feasibility of replacing such pedestrian bridges with at-grade crossings will* be *actively explored and aligned with Bus Connects and Luas Finglas proposals."*

Issue Raised in DCC Submission for Finglas SDRA

The Proposed Scheme includes provision of a signal crossing on Finglas Road at Church Street to overcome the existing severance for cyclists who cannot use the narrow footbridge or gain access to the eastern side of the road from the west to travel southwards. It will also provide pedestrian access to proposed new bus stops on each side of the dual carriageway which will service a proposed new bus route along the Finglas Bypass. The Proposed Scheme includes signal-controlled cycle crossings of Finglas Road aligned with Church Street, and a separate pedestrian crossing just to the south of the junction aligned for access to the bus stops. This element of the Proposed Scheme augments the existing footbridge rather than replaces it. The footbridge is on the desire line for pedestrians walking between the village and the area to the west who can cross Finglas Road without delay. Removal of the footbridge is not necessary for the Proposed Scheme.

2.2.2.1.2.3 Phibsborough LEIP

The DCC submission summarises the Phibsborough Local Environmental Improvement Plan (LEIP), adopted in January 2017, which includes a number of objectives that are relevant to the Proposed Scheme:

> *Public Ream and Open Space Objectives:*
>
> *No. 2 Create a new civic space linking the Library to 'the Soldier' denoting an entrance to the Village and enhanced access and connection to Broadstone Park.*
>
> *No. 8: Implement the objectives of the Dublin City Canals Report and this Plan, in association*
>
> *with Waterways Ireland and the National Transport Authority, namely:-*
>
> - *New cycle and pedestrian track along the Royal Canal*
> - *New bridges over the canal, at Mountjoy Prison, Cross Guns Bridge and Mount Bernard Park*
>
> *No. 9. Continue to develop Blessington Street Park and Basin: including*
>
> *• Upgrade the entrance to the Park from the North Circular Road, and the setting of the 'Soldier', to Include new access gates, pedestrian and cycle access and landscaping.*
>
> *No. 10. Carry out landscape improvements to the Royal Canal Bank, west of Mountjoy Prison. Long-term objectives for this site include the integration into the wider redeveloped Mountjoy Prison site and the removal of the Eircom building to a/low for streetscape/landscape enhancements.*
>
> *Movement and Transport Objectives*
>
> *No. 31. Carry out a review of Doyle's Corner and the junction of Phibsborough Rood and Connaught Street following the operation of LUAS Cross City with on objective of seeking visual and public domain Improvements and enhancing pedestrian and cyclist experiences.*
>
> *No. 32. Review the safety of the existing footpath at Westmoreland Bridge and provide a widened/ new bridge If deemed suitable.*

No. 33. Seek to provide additional crossings over the Canal and railway to enhance pedestrian permeability, and use of the Canal bank for both sports and recreation.

Notably the DCC submission does not mention the planned cycle route along Royal Canal Bank, which is included in the Greater Dublin Area Cycle Network Plan, published by the NTA in 2013. This cycle route is noted on page 31 of the LEIP and is included in the list of *Movement and Transport Objectives* as follows:

36. "Support the implementation of the proposed cycle/pedestrian route along the Royal Canal including new bridges over the Canal, and the proposed cycle route along Royal Canal Bank."

The public realm and open space objectives of the LEIP have been addressed in the design of the Proposed Scheme.

Description of Proposed Scheme at Phibsborough

The proposed scheme is best illustrated on the Landscape General Arrangement Drawings in EIAR Volume 3, Part 5, Sheets 13 & 14.

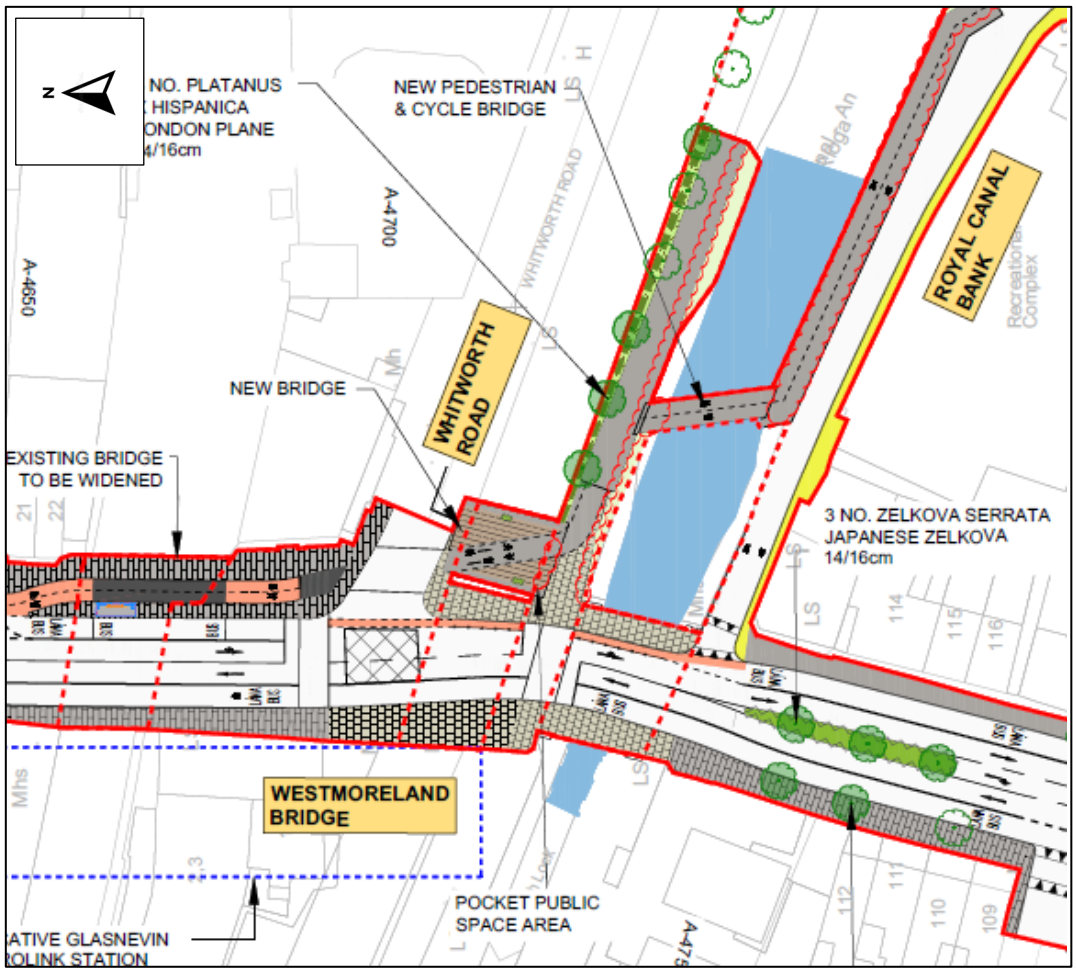


Figure 2.11.6: Extract from Landscape General Arrangement Drawing Sheet 13 at Phibsborough

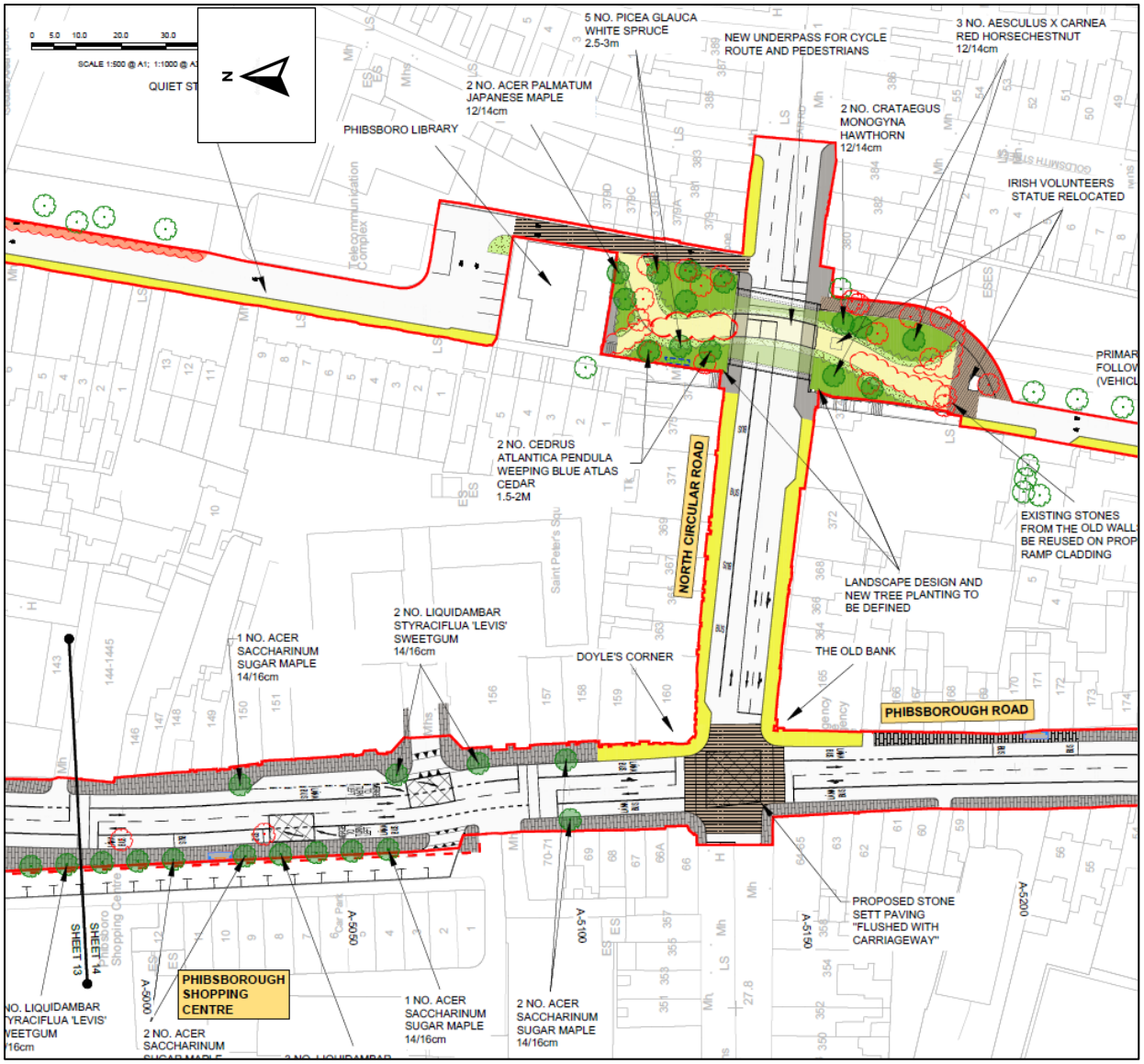


Figure 2-11-7: Extract from Landscape General Arrangement Drawing Sheet 14 at Phibsborough

Issues Raised in DCC Submission for Phibsborough

The submission by Dublin City Council raises a number of issues as follows:

> *"Detailed drawings for the public space at the library/ Soldier should be agreed with DCC's Park Department."*

> *"Concerning footpath widening, it is noted that the proposal Includes the widening of an existing rail bridge north of Whitworth Road but does not appear to Include proposals for the widening of Westmoreland Bridge. Westmoreland Bridge was Identified In the LEIP as of particular concern for pedestrian safety."*

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

Responses to Issues Raised in DCC Submission for Phibsborough

The Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC objectives and these matters were the subject of extensive liaison throughout the design development process. Many of the LEIP objectives will be delivered by the Proposed Scheme as follows:

Phibsborough LEIP Objective	Element of Proposed Scheme
Public Ream and Open Space	
No. 2 Create a new civic space linking the Library to 'the Soldier' denoting an entrance to the Village and enhanced access and connection to Broadstone Park.	The Proposed Scheme provides new connectivity with a bridge under North Circular Road which will integrate the public spaces on both sides of the road. A new location is included for "the Soldier" in this enhanced and linked public open space.
No. 8: Implement the objectives of the Dublin City Canals Report and this Plan, in association with Waterways Ireland and the National Transport Authority, namely:- *• New cycle and pedestrian track along the Royal Canal* *• New bridges over the canal, at Mountjoy Prison, Cross Guns Bridge and Mount Bernard Park*	The Proposed Scheme will provide a new bridge over the Royal Canal a short distance to the east of Cross Guns Bridge, and it will provide improved connectivity between the Royal Canal and the linear park along Royal Canal Bank to the south, which links onwards to Blessington Street Basin and to Broadstone Gate.
No. 9. Continue to develop Blessington Street Park and Basin: including *• Upgrade the entrance to the Park from the North Circular Road, and the setting of the 'Soldier', to Include new access gates, pedestrian and cycle access and landscaping.*	
No. 10. Carry out landscape improvements to the Royal Canal Bank, west of Mountjoy Prison.	The Proposed Scheme includes a southbound cycle track along the western edge of this space, and it has been aligned to avoid severance of the open space so that DCC can separately undertake an improvement to the landscape of this linear park.
Movement and Transport Objectives	
No. 31. Carry out a review of Doyle's Corner and the junction of Phibsborough Road and Connaught Street	Improvements at these junctions have been included in the Proposed Scheme where practicable.
No. 32. Review the safety of the existing footpath at Westmoreland Bridge and provide a widened/ new bridge If deemed suitable.	The footpath on the western side of Westmoreland (Cross Guns) Bridge will be doubled to more than 3m wide in the proposed scheme.
No. 33. Seek to provide additional crossings over the Canal and railway to enhance pedestrian permeability ….	New wider footbridges over the two railways are included in the Proposed Scheme.

For the proposed modifications to the public space at North Circular Road and Royal Canal Bank crossing, the NTA will welcome further engagement with DCC Parks Department on matters of details.

At Westmoreland Bridge on Phibsborough Road over the Royal Canal the proposed scheme proposes to more than double the existing footpath width on the western side as is clearly shown on the drawings. Therefore the concerns of DCC about pedestrian safety are addressed in the proposals.

In Phibsborough Village the proposed scheme will involve minimal disturbance to the existing footpath layouts, but it is proposed to extensively reconstruct and improve the footpaths as part of the proposed high-quality urban realm improvements. There are limited extents of heritage paving features including granite kerbs in parts of the Doyle's Corner junction, which will be preserved in-situ. Otherwise the existing paving in Phibsborough Village is generally of poor quality concrete materials consisting of poured concrete, paving slabs, or paviour blocks. In the proposed scheme these footpaths will be replaced with high-quality stone materials over the 400m length of Phibsborough Road from the junction at Connaught Street southwards as far as the junction at Monck Place, for which a sample is shown in Figure Y-Y. New street trees will be introduced into the centre of the village as part of the Proposed Scheme.

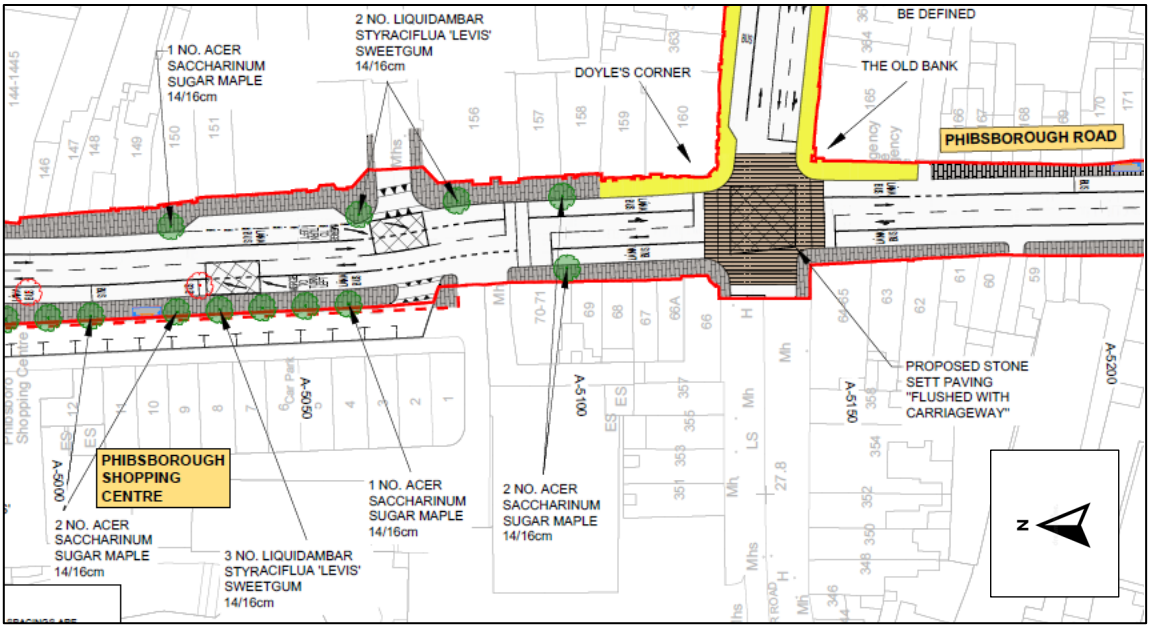


Figure 2-11-8: Extract from Landscape General Arrangement Drawing Sheet 14 at Phibsborough Shopping Centre and Doyle's Corner

2.2.2.2 Dublin City Development Plan 2022-2028

The 2022-2028 Dublin City Development Plan was adopted by the elected members on the 02/11/22 and came into effect on the 14/12/2022.

The DCC submission highlights relevant policies for the Proposed Scheme including:

SC1 *for Consolidation of the Inner City and SC8 for Development of the Inner Suburbs*

QHSN10 *for the 15 Minute City*

CEE12 *Transition to a Low-Carbon, Climate Resilient City Economy*

SMT1. *Modal Shift and Compact Growth*

SMT3 *Integrated Transport Network*

SMTB *Public Realm Enhancements*

SMT11 *Pedestrians and Public Realm*

SMTI3 *City Centre Road*

SMT18 *Integration of Active Travel with Public Transport*

SMT20 *Key Sustainable Transport Projects: including BusConnects*

The Proposed Scheme is fully aligned with all of these DCC policies, and it will deliver numerous relevant objectives in a practical and integrated fashion over the full length of two key radial routes in the north-central part of Dublin 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 references, as appropriate, to the submission's Appendix: "Departmental Recommendations / Conditions". The NTA is grateful for the positive and constructive liaison that has occurred with the DCC BusConnects Liaison Office throughout the design and planning process to date, and through that liaison office with the other Departments and Sections within DCC regarding the progression of the Proposed Scheme.

Section 2.4 Planning Assessment

C4 - Response to Section 2.4

2.4.1. Planning Policy

Response to Section 2.4.1:

Note this is responded to in Section 2.2 above.

2.4.2. Environmental Impact Assessment Report (EIAR)

Response to Section 2.4.2:

In relation to the EIAR, DCC states (at page 10 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, on page 11, that "*the content [of the EIAR] points generally to the development having negligible impact on the existing environment"*.

2.4.3. Natura 2000

Response to Section 2.4.3:

In relation to the NIS, DCC states (at page 21 of its submission) that *"Dublin City Council considers that the submitted Natura Impact Statement 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 goes 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."*

DCC also observes that: *"The Natura Impact Statement objectively concludes, following an examination, analysis and evaluation of the relevant information, including in particular the nature of the predicted impacts from the proposed scheme, and subject to the implementation of the identified mitigation measures, that the proposed scheme will not adversely affect (either directly or indirectly) the integrity of any European Site, either alone or in combination with other plans or projects."*

2.4.4. Zoning and other designations

Response to Section 2.4.4:

In relation to zoning, the NTA notes that DCC sets out the view on page 13 of its submission that, Public service installations are compatible with the Z1, Z2, Z3, Z4, Z6, Z9 and Z10 zones along the Proposed scheme.

2.4.5. Impact on amenity

Response to Section 2.4.5:

On page 22 of its submission, in relation to amenities, DCC states: *"Dublin City Council is satisfied that the elements of the proposed scheme which fall within the administrative area of the Council would not have any excessive or undue impact on the amenities of the area".*

In fact, DCC goes on to state (at page 22): *"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 states that "*the Proposed Scheme will help to achieve the strategic objectives envisaged in the Dublin City Development Plan 2022-2028 pertaining to: compact growth; sustainable mobility and permeability; and place making, while significantly contributing towards climate action"*. DCC further notes that while the Scheme is supported, it is important that the Core Bus Corridor adequately addressed conservation impacts along the route. The NTA note this comment. In general, the EIAR addresses conservation impacts within EIAR Volume 2 Chapter 15 Archaeological and Cultural Heritage, Chapter 16 Architectural Heritage and Chapter 17 Landscape (Townscape) and Visual. Specific conservation related comments are responded to in Section 2.4.9 below.

2.4.7. Environment and Transportation Department Comments

Response to Section 2.4.7 General Comments:

The Environmental and Transportation Department of DCC sets out (at page 23 of the submission) that there are a number of specific issues that need to be addressed relating to Ballymun Main Street (car parking provision and location, landscape treatment), the R108 between Santry Cross and the junction with St. Margaret's Road, the new SDRA recommendations for Finglas village and environs and the objectives of the Phibsborough LEIP. These issues have been responded to earlier in this report in Section 2.2.

One further issue is raised in this part of the DCC submission:

Issue Raised in DCC Submission for Construction Compound B1

There is one comment included on page 23 of the submission:

> *"in relation to the construction compounds proposed, it is recommended that a landscape proposal be prepared following the site works for Construction Compound Bl at Santry Cross."*

Response to Issue Raised in DCC Submission for Construction Compound B1

The proposed scheme at the location of Construction Compound B1 at Santry Cross is shown on the Landscape General Arrangement Drawings in EIAR Volume 3, Part 5, Sheet 2:

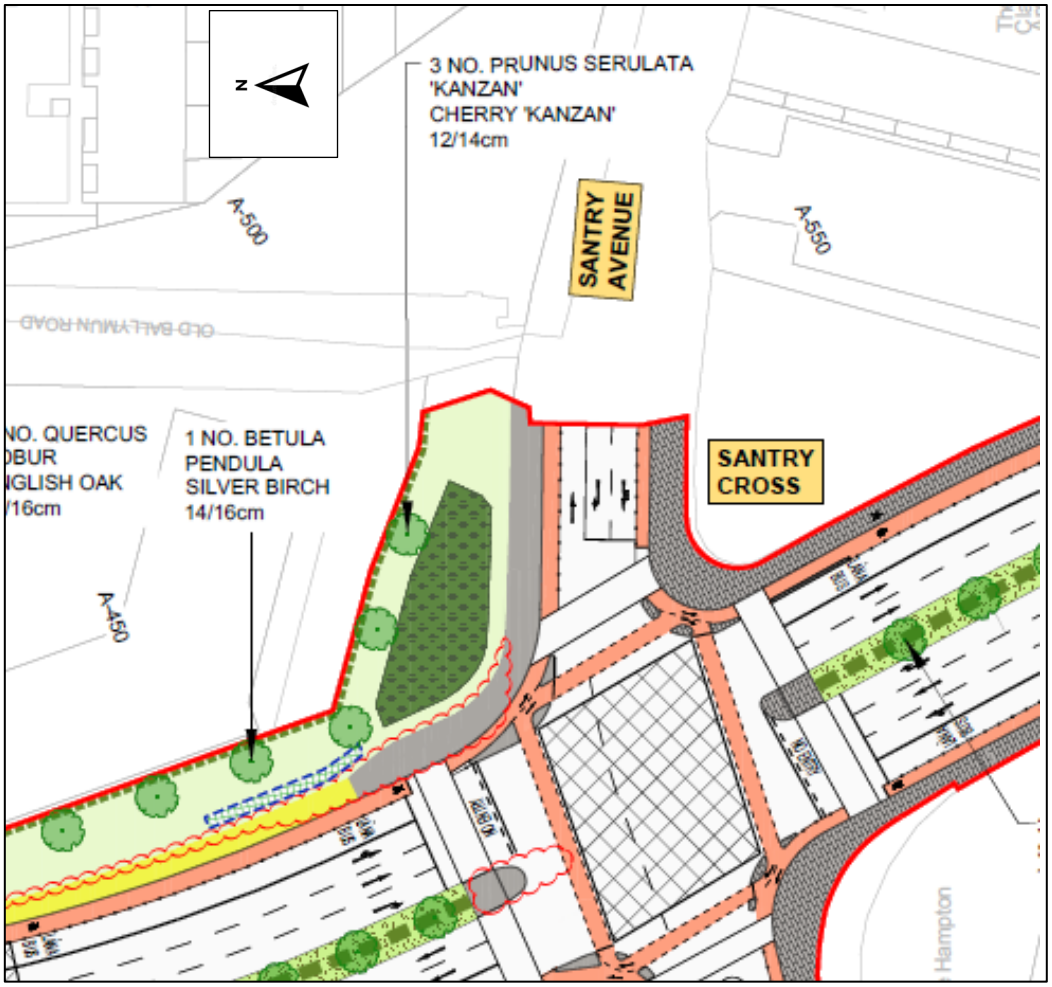


Figure 2-11-9: Extract from Landscape General Arrangement Drawing Sheet 2 at Santry Cross

Figure 2-11-10: The Location of Proposed Construction Compound B1 at Santry Cross

The proposed scheme includes landscaping at Compound B2 to be provided once the compound is removed. For the proposed landscaping of this area, which will include 3 new trees and an area of shrubs, the NTA will welcome further engagement with DCC Parks Department on matters of details. Once planted after the Proposed Scheme works, there will be an improvement in the visual quality of this important street corner which is mainly just covered in grass at present.

2.4.7 Environment and Transportation Department

The Environment and Transportation Department has provided comments under the headings of General Comments, Traffic Division, Roads Division, and Environmental Protection Division.

2.4.7,1 General Comments

This part of the submission includes the following statements which are welcomed by NTA:

> *"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 Development Plan.*
>
> *Dublin City Council is obligated to consider the Proposed Scheme in the context of the vision and range of policies set out in the current and forthcoming development Plan with a view to safeguarding the city as a place in which to live, work, visit and do business. Dublin City Council recognises that the bus is the most important mode of public transport in Dublin, and this is best illustrated by the fact that, in 2019, almost 160 million journeys were made by bus in the Dublin Region, representing 65% of all public transport trips in the Dublin area. In addition, the OCC/NTA cordon count in 2019 showed that the bus was the single highest mode of transport crossing the canal, 30% of all trips, and the bus accounted for over half of all public transport trips into the city centre.*
>
> *The commitment by the NTA within the BusConnects project to increase the level of priority afforded to the bus service is very much welcomed. The introduction of, for the most part, separated and segregated cycle ways is again welcomed as providing the opportunities:*
>
> - *To provide a better and safer cycling environment for all ages and abilities*
> - *To help the bus maintain a steady speed and so achieve its Journey times and even headways by removing bicycles from potentially being a source of delay in the bus lane."*

2.4.7.2 Traffic Division

In general terms the Traffic Division of Dublin City Council is strongly supportive of the proposed CBC scheme. It notes the proposals for signal controlled priority for buses at various locations where bus lanes cannot be provided.

There are several specific queries and observations about the scheme proposals that are responded to in this document.

Proposed Parking on Ballymun Road South of Our Lady of Victories Primary Schools

Description of Proposed Scheme at this Location

The proposed scheme layout on Ballymun Road south of Collins Avenue is shown on the General Arrangement Drawing Sheet No.6 in Volume 1 Part 3 of the EIAR as extracted below.

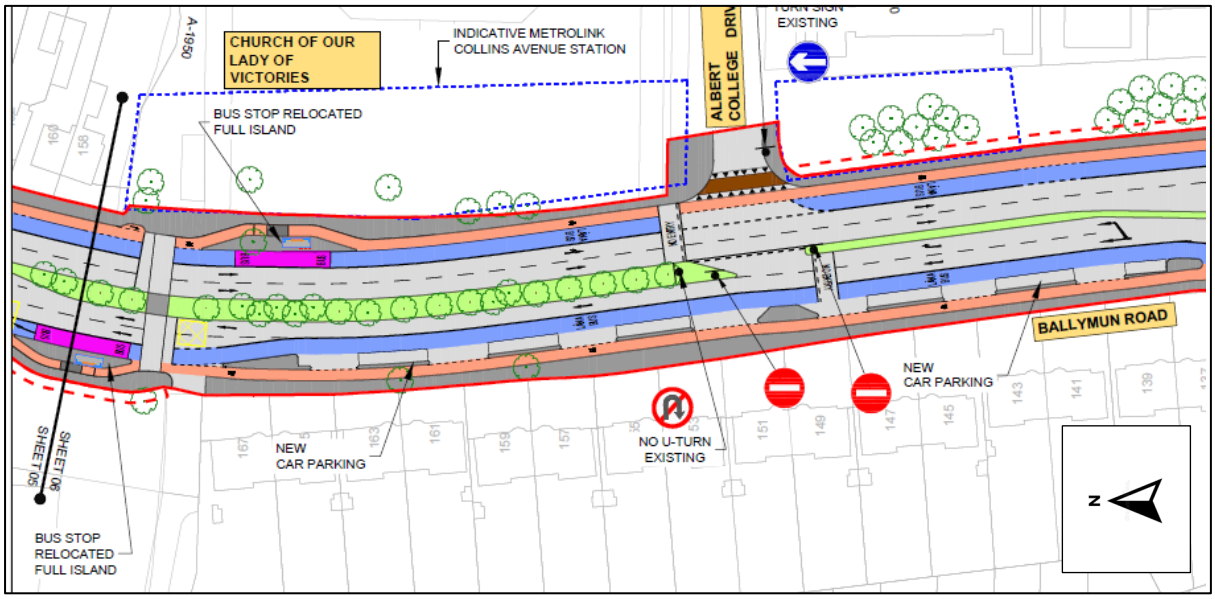


Figure 2-11-11: Extract from General Arrangement Drawing Sheet 6 at Our Lady of Victories Schools

Issue Raised in DCC Submission – Parking on Ballymun Road

A description of the Issue Raised in DCC Submission

The submission by Dublin City Council (Page 25) is as follows:

> *"Clarity should be sought on the purpose of the new parking at the school on the Inside of the bus lane, as it would not appear to be something that Is needed or desirable."*

Response to Issue Raised in DCC Submission

There is regular obstruction of the bus lane and cycle lane by cars parked in the vicinity of the primary schools which is problematic for the proper operation of the public transport and active travel facilities. An illustration of this situation is provided in Figures 6-14 and 6-15 on Page 59 of the Preferred Route Option Report.

Assessment of the traffic operation of the existing street concluded that there is no need for two traffic lanes at this location, and therefore it is proposed to resolve the existing parking problem through removal of one traffic lane to be replaced by indented parking bays. The proposed scheme will provide a more robust and reliable arrangement to protect the operation of the bus lane and cycle track from obstruction by illegal parking.

Figure 6-14 – Ballymun Road at Our Lady of Victories National School (Google)

Figure 6-15 – On-Street Parking on Ballymun Road associated with Our Lady of Victories National School

Figure 2-11-12: Extract from Preferred Route Option Report Page 59

Proposed Scheme at Griffith Avenue Junction

Description of Proposed Scheme at this Location

The proposed scheme layout at the junction of Griffith Avenue with Ballymun Road and St. Mobhi Road is shown on the General Arrangement Drawing Sheet No.9 in Volume 1 Part 3 of the EIAR as extracted below.

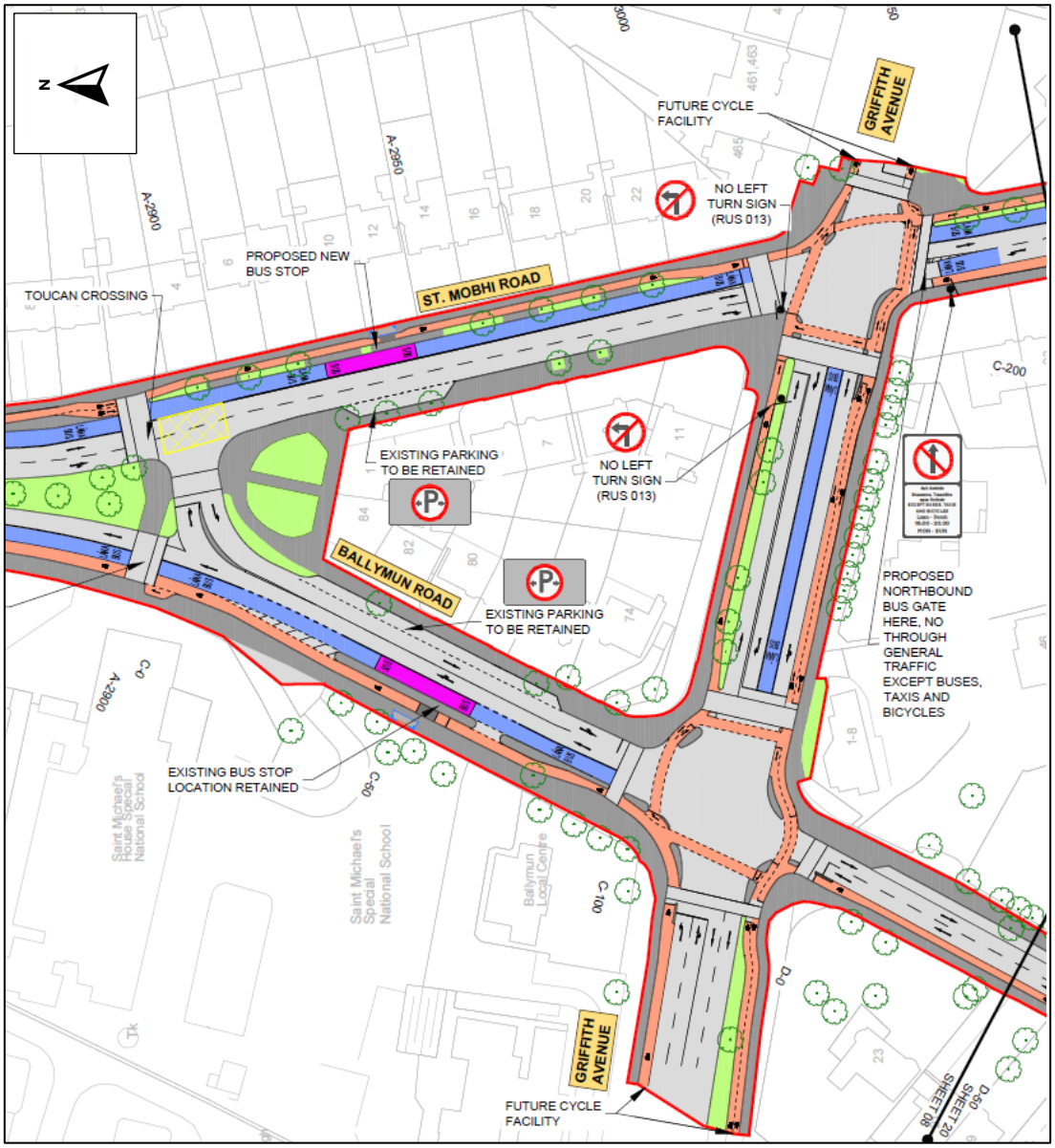


Figure 2-11-13: Extract from General Arrangement Drawing Sheet 9 at Griffith Avenue

Issues Raised in DCC Submission

The submission by Dublin City Council (Page 25) is as follows:

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

Responses to Issues Raised in DCC Submission – Griffith Avenue Junction

The existing road layout on Griffith Avenue was modified by Dublin City Council in 2021 as a temporary measure to allocate road space to cyclists during the COVID-19 pandemic. The funding for the implemented measures was provided to DCC by the NTA Active Travel department, with all parties (DCC and the NTA) being aware that the interim scheme being implemented would be replaced by the

Bus Connects proposals at this junction in due course. The proposed BusConnects scheme requires a different road layout at this junction for several reasons as follows:

a) To accommodate a northbound bus lane on the east-west leg of the junction for improved bus priority.

b) To provide for a new eastbound traffic movement along Griffith Avenue between Ballymun Road and St. Mobhi Road, which will enable the removal of the southbound left turn at the corner of St. Mobhi Road to accommodate a southbound bus lane up to the stop line and to remove conflicts between left-turning traffic and both buses and cyclists, as is described in EIAR Chapter 4 Section 3.1.1.4. This is a major component of the BusConnects proposals for more reliable bus priority and greater safety for cyclists in the southbound direction.

c) Two eastbound traffic lanes are necessary to have sufficient traffic capacity on the western approach to the junction to cater for traffic displaced by the proposed northbound bus gate on St. Mobhi Road during operational hours in the evening peak period. This requires two eastbound traffic lanes on the immediate approach to the junction of Griffith Avenue Extension with Ballymun Road. These two traffic lanes need only extend for 70m west of the junction and can taper back to a single lane to tie-in with the recently modified road layout on Griffith Avenue. In the westbound direction the BusConnects scheme design predates the recent adjustment of the road layout on Griffith Avenue Extension which reduced it from 2 traffic lanes to one. The proposed scheme can be adapted to taper into a single westbound traffic lane downstream of the junction to tie-in with the recently modified road layout.

In the proposed scheme the cycle tracks along Griffith Avenue at the junctions with Ballymun Road and St. Mobhi Road will be relocated onto the grass verges to the sides of the road, and the protected facilities at the junctions will be adjusted accordingly during the detailed design process On the southern side of the road the Proposed Scheme includes a two-way cycle track, rather than the the recently modified road layout which introduced one-way segregated cycle tracks. The two-way cycle track is intended to provide a connection from Glasnevin Educate Together primary school which is located just 180m west of the junction. It will avoid the need for eastbound cyclists to cross Griffith Avenue twice to cover the short distance to Ballymun Road and St. Mobhi Road which links to a wide catchment area to the east of the school. Currently child cyclists may be seen on the footpath making this movement, which would be catered for safely by the proposed two-way cycle track. The proposed scheme could be integrated into the recently constructed cycle tracks on Griffith Avenue Extension with suitable adjustment in conjunction with Dublin City Council.

Bus Stop at Proposed Glasnevin Railway & Metro Station

Description of Proposed Scheme at this Location

This issue refers to Sheet 13 of the General Arrangement Drawings:

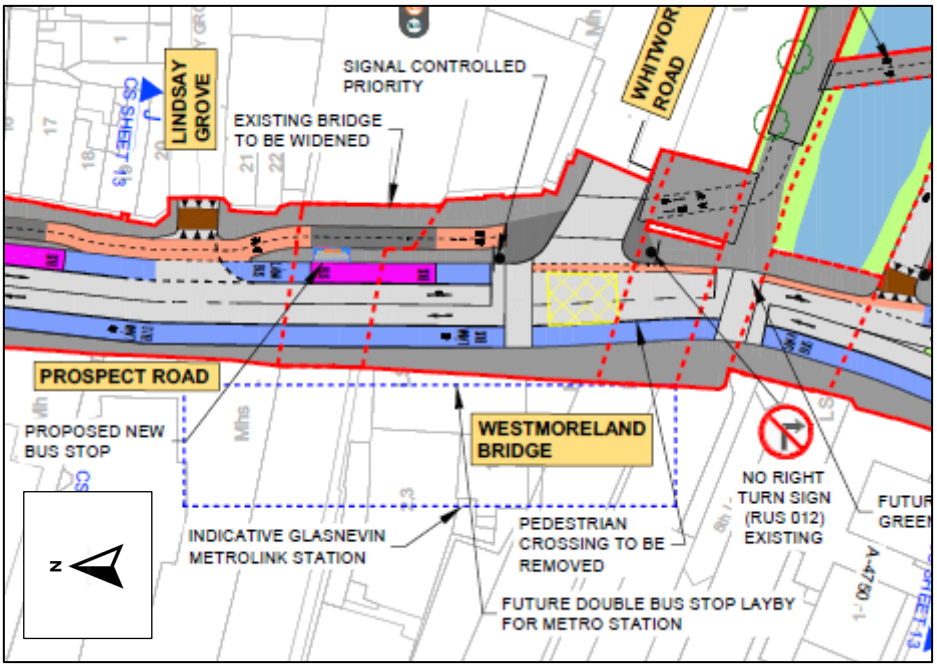


Figure 2-11-14: Extract from General Arrangement Drawing Sheet 13

Issue Raised in DCC Submission

The DCC submission (Page 25) is as follows:

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

Response to Issue Raised in DCC Submission

Provision of a bus stop at the future railway/metro station is annotated on the proposed scheme drawing shown in Figure 2-11-14. The detailed arrangement of the station and the surrounding plaza is included in the Metrolink scheme in a separate planning application, and this proposal was developed in coordination between the BusConnects and Metrolink design teams.

Junction of Church Street and North King Street

Description of Proposed Scheme at this Location

This issue refers to Sheet 17 of the General Arrangement Drawings:

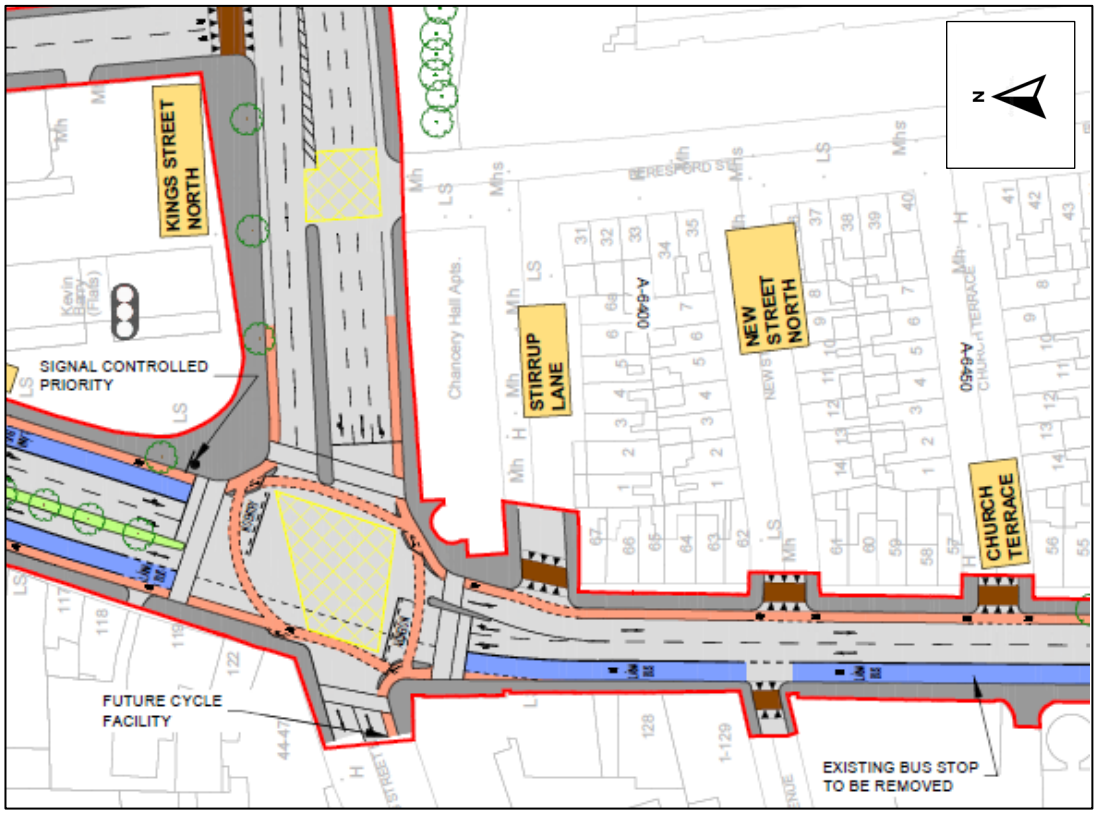


Figure 2-11-15: Extract from General Arrangement Drawing Sheet 17

Issue Raised in DCC Submission

The DCC submission (Page 25) is as follows:

> *"The Junction design with the reduction of the right turning pocket (northbound) at the junction of Church Street and North Kings street will most likely lead to delays along the route which could impact on Luas service.*

Response to Issue Raised in DCC Submission

The Proposed Scheme layout retains a short right-turn lane on Church Street northbound at the junction with North King Street, which is similar to the existing provision as shown in the aerial photograph in Figure 2-11-16. There is a small demand for this right-turn, as most traffic headed in the direction of Bolton Street tends to use the parallel route to the east along Beresford Street from which there are more opportunities to turn right. In this regard there will be no material change in the traffic layout and no increase in risk of queuing that could affect the LUAS crossing at Chancery Street over 300m further south.

Figure 2-11-16: Existing Layout at the Junction of Church Street with North King Street

Junction of Church Street and LUAS Red Line at Chancery Street

Description of Proposed Scheme at this Location

This issue refers to Sheet 18 of the General Arrangement Drawings:

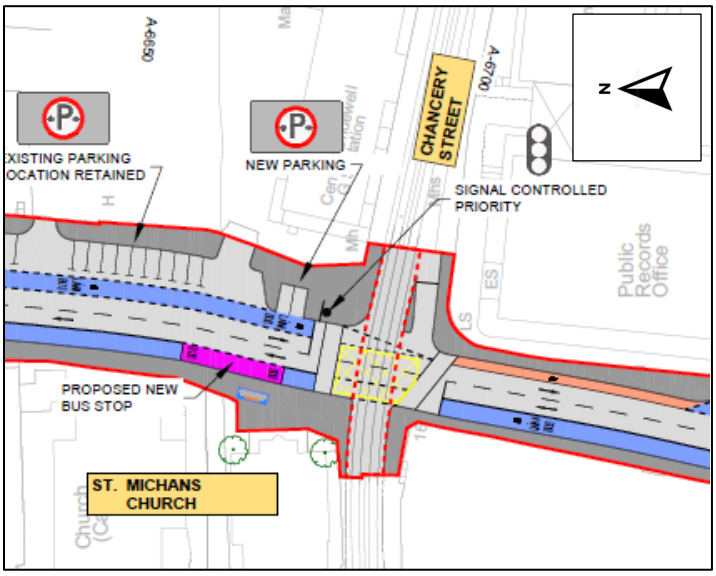


Figure 2-11-17: Extract from General Arrangement Drawing Sheet 18

Issue Raised in DCC Submission

The DCC submission (Page 25) is as follows:

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

Response to Issue Raised in DCC Submission

The road layout at the crossing of the LUAS Red Line at Church Street was reviewed with Transport Infrastructure Ireland who operate the tramway. TII expressed a desire for the existing left-slip lane to be retained as there is Garda traffic use of Chancery Street, and the current road layout provides better resilience for the tram operations by segregation from this traffic at the junction. The proposed scheme therefore provides a necessary improvement at this junction with a new pedestrian crossing of Church Street without affecting the existing arrangement for the tramway. The crossing is at a slight angle on the desire line for pedestrians which may be a little longer than a square crossing but is better aligned for pedestrian movements in the direction to and from Smithfield.

Junction of Finglas Road and St. Margaret's Road

Description of Proposed Scheme at this Location

This issue refers to Sheet 23 of the General Arrangement Drawings:

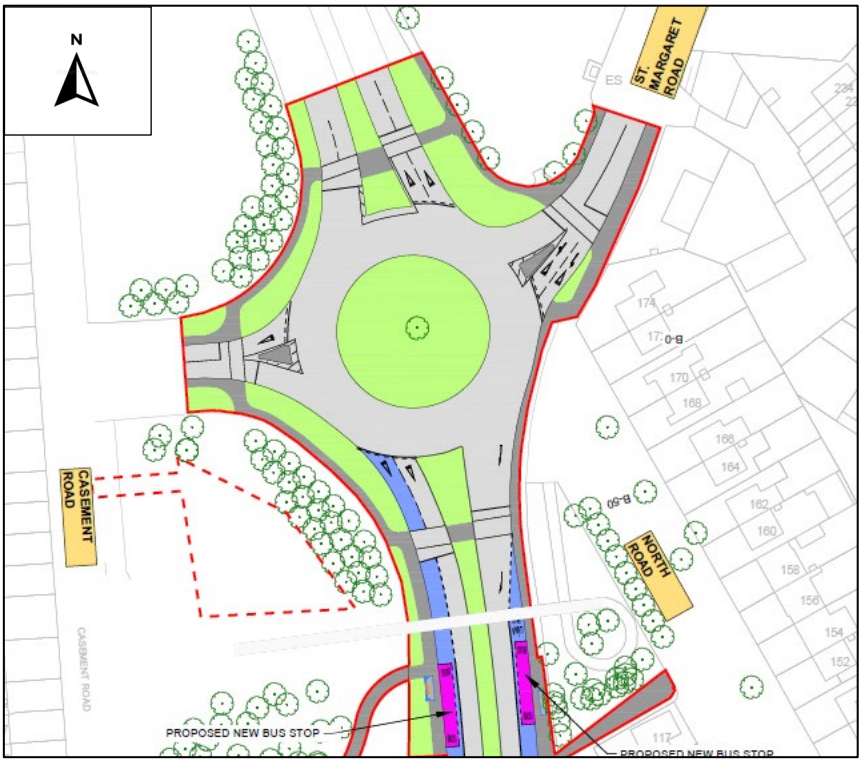


Figure 2-11-18: Extract from General Arrangement Drawing Sheet 23

Issue Raised in DCC Submission

The DCC submission (Page 25) is as follows:

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

Response to Issue Raised in DCC Submission

The Proposed Scheme has been integrated into the existing roundabout junction at the northern end of Finglas Road. It is appreciated that the separate future LUAS Finglas scheme is expected to include a proposal to replace this roundabout with a signal-controlled junction which will include suitable provision for the core bus corridor to connect between Finglas Road and St. Margaret's Road. During the design development for the Proposed Scheme there was liaison between the BusConnects and LUAS teams to integrate the two schemes where appropriate. This liaison will continue for the detailed design stages of both schemes once planning consents are obtained.

Yellow Boxes in Bus Lanes

Description of Proposed Scheme at this Location

This issue refers to several sheets of the General Arrangement Drawings:

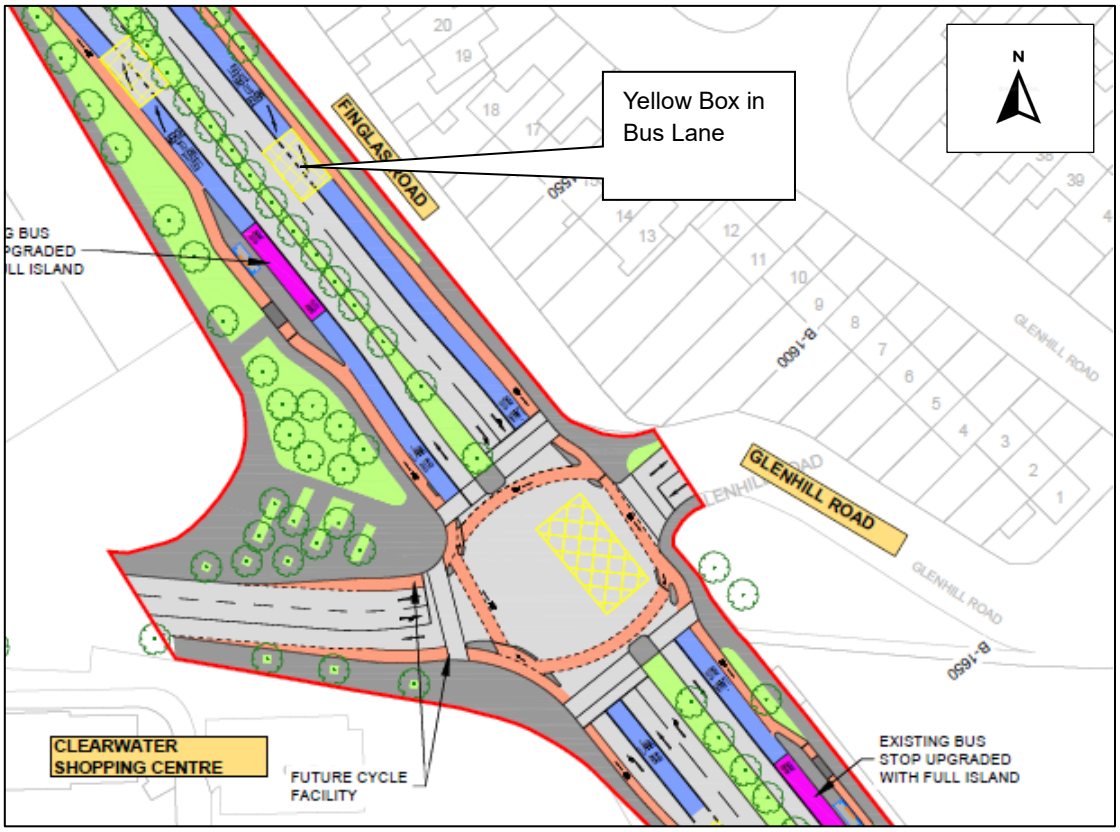


Figure 2-11-19: Extract from General Arrangement Drawing Sheet 29

Issue Raised in DCC Submission

The DCC submission (Page 25) is as follows:

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

Response to Issue Raised in DCC Submission

The Proposed Scheme design includes provisions to prevent left-turn traffic movements from bus lanes at junctions where this would give rise to conflicts with the parallel cycle track movements during the early-start bus signal stage as is shown in Figure 19 on page 12 of the Preliminary Design Guidance Booklet for BusConnects Core Bus Corridors included in the EIAR Volume 4, Appendix A4.1 of the scheme application documentation shown below. Any permitted bus lane traffic such as public service vehicles which includes taxis and private coaches that wishes to turn left must first move right into the general traffic lane and await the green signal for that lane which will come after the green bus signal has shut down and most cyclists will have cleared the junction in advance of the left-turn traffic movement.

Preliminary Design Guidance Booklet
for BusConnects Core Bus Corridors

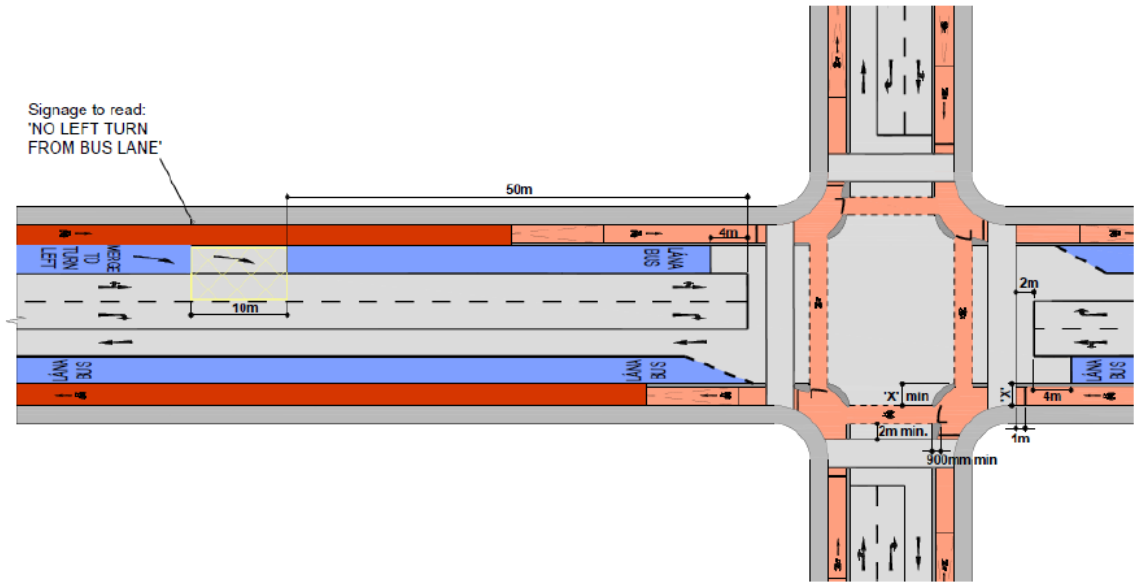


Figure 19: Example of location-specific Road Markings in advance of Bus Priority Traffic Signals

Figure 2-11-20: Extract from BusConnects Preliminary Design Guidance Booklet (page 12)

Proposed Scheme at Junction of Finglas Road and Prospect Way – Traffic Signals for Cyclists

Description of Proposed Scheme at this Location

The proposed scheme layout at the junction of Finglas Road and Prospect Way is shown on the General Arrangement Drawing Sheet No.37 in Volume 1 Part 3 of the EIAR as extracted below.

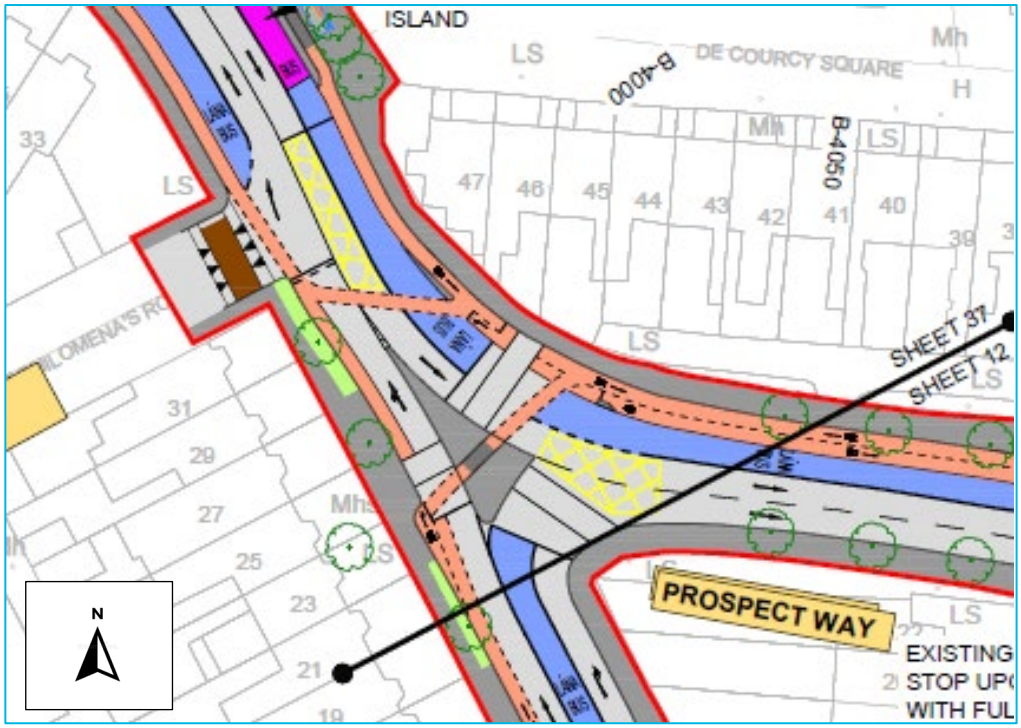


Figure 2-11-21: Extract from General Arrangement Drawing Sheet 37 at Junction of Finglas Road and Prospect Way

Issue Raised in DCC Submission

The submission by Dublin City Council (on page 26) is as follows:

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

Response to Issue Raised in DCC Submission

A limited level of detail is included on the General Arrangement drawing which should be considered in conjunction with additional information provided in EIAR Volume 3 Part 10 Junctions System Design Drawings, where the junction of Finglas Road and Prospect Way is included on Sheet 17 of which the relevant extract is shown in Figure 2-11-22. This drawing shows the locations of the proposed stop lines and traffic signals to control the crossing movement of northbound cyclists from the eastern to the western side of Finglas Road a short distance to the north of the pedestrian crossing. There are two stop lines indicated for northbound cyclists. The first is on Prospect Way before the pedestrian crossing where most cyclists will be held until they are released to advance to Finglas Road and to cross diagonally to the western side just before the side street junction at St. Philomena's Road. The second stop line and cycle signal are located immediately before the crossing of Finglas Road, which will prevent any late arrival cyclists from progressing across the road while traffic is on a green signal. The relevant stop lines and cyclist traffic signals are shown located on narrow separator islands.

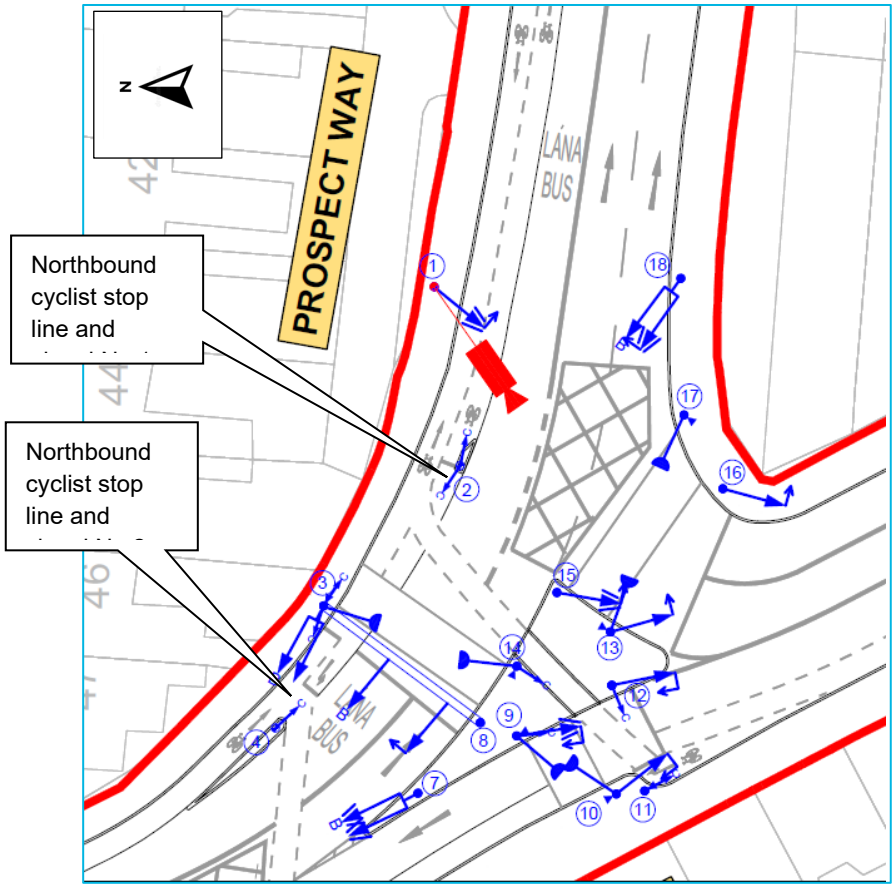


Figure 2-11-22: Extract from Junction Systems Design Drawing Sheet 17 at Junction of Finglas Road and Prospect Way

Interface with Metrolink

The proposed Ballymun to City Centre Core Bus Corridor will interface with the proposed Metrolink at 6 locations as follows from north to south:

i) Northwood

ii) Ballymun town centre

iii) Collins Avenue

iv) Albert College Park

v) Griffith Park

vi) Phibsborough

Issue Raised in DCC Submission

The submission by Dublin City Council on page 26 is as follows:

> *"DCC recommends that it is a requirement to establish a coordination group made up of the NTA, TII, DCC and the various construction contractors to ensure maximum Integration and to provide a forum for resolving any Issues which may arise."*

Response to Issue Raised in DCC Submission

There has been very extensive coordination between the project teams for BusConnects and Metrolink during the development of the two scheme proposals to date. NTA will continue this collaboration with TII and with DCC during the further stages of the scheme delivery.

2.4.7.3 Roads Division

There are several specific queries and observations about the scheme proposals that are responded to in this document.

Provisions for Pedestrians

Issue Raised in DCC Submission

The DCC submission on page 26/27 is as follows:

> *"The schemes, including the Ballymun-Finglas scheme, could be improved by making greater provision for pedestrians by ensuring sufficient and appropriate footpath widths based on pedestrian flows (with an absolute minimum 2m width) and also by ensuring pedestrian priority throughout the routes. Where minimum 2m footpaths are proposed, cognisance must be taken of street lighting and furniture which may actually restrict access. There are recurring situations throughout the schemes where user priority is unclear, for example at bus stops and where cycle routes cross footpaths. Grade or physical separation between cycling facilities and footpaths is recommended and running cycle tracks through footpaths and pedestrianised areas should be avoided. Ensuring pedestrian priority Is important particularly in the context of people with accessibility issues Including visual impairments. Pedestrians, in accordance with all levels of policy, should be ensured priority through signage and other appropriate measures. A condition is recommended in this regard."*

Response to Issue Raised in DCC Submission

The Proposed Scheme was developed in accordance with the hierarchy of provision as set out in the Design Manual for Urban Roads and Streets in descending order for pedestrians, cyclists, public transport and general traffic. In that respect the provision of space for pedestrians has been the first priority in the design. Generally the existing footpaths along the streets in the proposed scheme are reasonably wide and sufficient for the level of pedestrian movements. However in certain locations the need for wider footpaths was identified and is included in the proposed scheme. Examples are as follows:

- Westmoreland Bridge (Cross Guns Bridge) over the Royal Canal in Phibsborough where the narrow footpath on the western side will be more than doubled in width.
- Ballymun town centre where parking laybys will be removed to ensure a consistently wide footpath.
- On part of St. Mobhi Road on the eastern side the footpath will be widened to 2.5m to cater for the busy access route to several schools and sports clubs.
- On Finglas Road where the cycle tracks will be relocated to the edge of the road and the footpaths widened with removal of shared use.

On the other hand in some very constrained places on St. Mobhi Road it is necessary to narrow the existing wide footpaths to 1.8m to enable segregated cycle tracks to fit behind the existing mature street trees.

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

The Proposed Scheme will increase the number of controlled pedestrian crossings from 111 in the Do Minimum to 137 in the Do Something scenario. Additionally, there will be an increase in the number of raised table crossings on side roads from 27 in the Do Minimum to 78 in the Do Something scenario.

Interactions at Bus Stops

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. (Where space is constrained a narrow island bus stop will be provided where the waiting area is located on the main footpath instead, and so that alighting bus passengers will not step directly onto the cycle track). 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' traffic signal 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.

Loading and Servicing

Issue Raised in DCC Submission

The DCC submission on page 27 is as follows:

> *"While It is accepted that additional space for bus and cycle lanes may need to be created through the removal of on street parking and loading facilities, this has to be necessarily balanced with the requirement for loading and servicing."*

Response to Issue Raised in DCC Submission

The NTA notes DCC's comments in relation to Impact on Loading and Servicing and the challenge to balance a wide range of competing demands with public transport, pedestrians, cyclists, the private car and the functional and servicing needs of the city economy whilst ensuring the city remains a vibrant, attractive and accessible area for all.

This challenge directly correlates to the Proposed Scheme objectives as set out in Section 1.2 of Chapter 1. The 15-Minute City policy QHSN10 set out in Chapter of 5 of the forthcoming Draft Dublin City Development Plan 2022-2028 is also supported by the Proposed Scheme objectives. Movement of people is a core design philosophy of the Proposed Scheme as described in the EIAR Volume 2 - Main Chapters, Chapter 6 Traffic & Transport, which is 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 Proposed Scheme including Ballymun town centre, Glasnevin Village and Phibsborough Village benefit from the 15-Minute City principles.

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

Section 6.4.6.1.7.4 of Chapter 6 summarizes the changes to the parking and loading provisions as a result of the Proposed Scheme. With a few exceptions due to constraints, the existing servicing and loading provisions have been retained. In very restricted places such as in Phibsborough Village it may

be necessary to allow loading from within the bus lane for limited off-peak hours instead of designating formal loading bays.

It is noted that following a detailed assessment as set out in the Parking and Loading Report contained in Appendix G of the Preliminary Design Report included in the Supplementary Information, that loading facilities have been retained in critical areas, such as Ballymun Main Street and Phibsborough Village (north of Doyle's Corner).

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

Interactions with Other Public Transport Schemes

Issue Raised in DCC Submission

The DCC submission on page 27 is as follows:

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

Response to Issue Raised in DCC Submission

Extensive coordination has taken place during the design development phase of both this CBC scheme and Metrolink to align the two projects which will interact at 6 locations of proposed stations. The designs are fully coordinated and aligned. The NTA has liaised with Transport Infrastructure Ireland in relation to the interface of the Proposed Scheme in BusConnects with the LUAS Finglas scheme which is at an earlier stage in the design process. This liaison will be continued to ensure that both schemes are successfully integrated. Interactions between the various proposed public transport schemes is fully covered in Chapter 21 of the EIAR for Cumulative Impacts and Environmental Interactions.

Interactions Between Cyclists and Pedestrians & Drainage

Issue Raised in DCC Submission

The DCC submission on page 27 is as follows:

> *"it is noted that in a number of locations throughout the Ballymun-Finglas Scheme the cycle track arrangement is shown between the grass verge (at the edge of the carriageway) and the footway. Positioning the verge between cycle track and footpath (cycle track on the outside) could allow both hard surfaced areas to drain to the verge, providing SuDS functionality. Likewise, positioning the grass verge between the footway and cycle track would remove the need for tactile warning between footpath and cycle track."*

The submission also mentions narrow island bus stops and narrow footpaths in certain places such as St. Mobhi Road.

Response to Issue Raised in DCC Submission

For most of the 1.5km length of the Finglas Road dual carriageway between Finglas Village and old Finglas Road where there are grass verges along the edges of the road, the proposed cycle track will be located on the road side of the tree-lined verges to provide new separation between cyclists and pedestrians compared to the existing arrangement. This will largely address the shortcomings of the current road layout as noted by DCC. In only one short 150m long northbound section of the proposed scheme is it proposed to locate the cycle track beside the footpath because of an irregularity in the existing road layout where the trees are too close to the carriageway for the cycle track to fit with

retention of those trees. (That section is just north of Tolka Valley Road). The Proposed Scheme includes for SuDS drainage improvements, as suggested by DCC, with infiltration of the footpath and cycle track drainage into the separation verge between the two facilities. This is illustrated on the Drainage Drawings included in EIAR Volume 3, Part 11, for which the extract below from Sheet 28 shows a typical arrangement along Finglas Road where there will be intermittent infiltration trenches provided to attenuate the surface water runoff from the footpath and cycle track elements of the road.

Narrow island bus stops are only included in the proposed scheme where space is restricted, and mainly for bus stops that will accommodate alighting activity more than boarding on the northbound side of the route. In those locations there would be little or no benefit in full width bus stop islands as waiting by boarding passengers will be minimal. Details of the narrow island bus stop are provided in EIAR Chapter 4, Proposed Scheme Description Appendix A4.1_ Preliminary Design Guidance Booklet (PDGB) for BusConnects Core Bus Corridors, Section 11.

EIAR Volume 2 Chapter 17, Landscape (Townscape) & Visual, documents the potential landscape (townscape) and visual impacts associated with the Construction and Operational Phases of the Proposed Scheme. The impacted trees are presented in the EIAR Volume 3 Chapter 4, Proposed Scheme Description, on the Landscaping General Arrangements and further described in Volume 4 Appendices Part 2 of 2, Appendix A17.1 Arboricultural Impact Assessment.

The Landscaping General Arrangement drawings display the majority of street trees are retained as a result of the Proposed Scheme design. On St. Mobhi Road a compromise was necessary to enable retention of the mature street trees that are of major significance for the existing high-quality visual character of the street. This entails reduction of the generous existing 2.5m to 3m wide footpaths to 1.8m, which is consistent with the minimum requirement of the Design Manual for Urban Roads and Streets as applicable to a suburban street with low numbers of pedestrians. The proposed cycle tracks are also of minimum 1.25m width for single file cycling as necessary to fit within the constraints on this street.

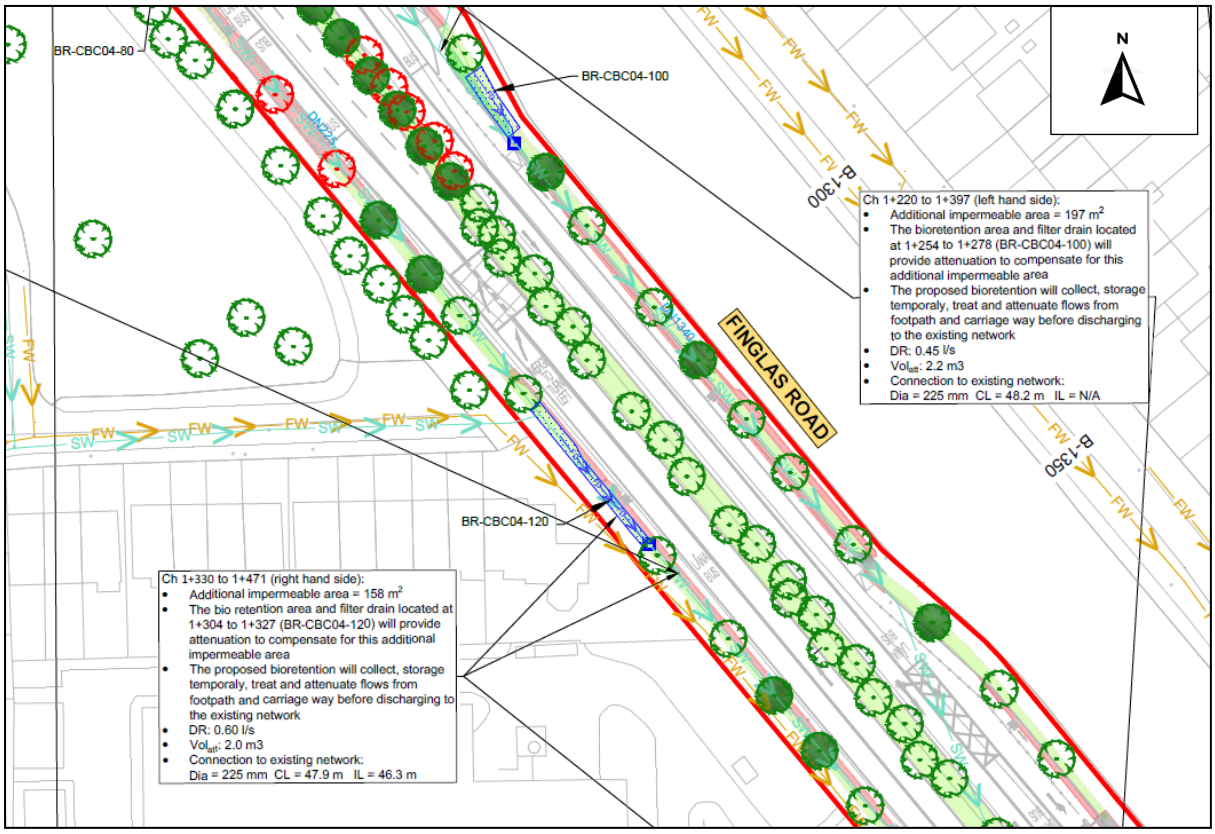


Figure 2-11-23: Extract from Surface Water Drainage Drawing Sheet 28 on Finglas Road

Ballymun Local Area Plan Site 31

Issue Raised in DCC Submission

The DCC submission on page 28 is as follows:

> *"An Bord Pleanála Is advised that the lands to the west of the scheme form part of the Ballymun Local Area Plan (Site 31), for which a masterplan has been prepared. The northern half of site 31 is intended for use as the launch site for Metrolink.*
>
> *It Is noted that temporary acquisition of lands at south west corner of Site 31 is proposed. It is not clear however how this will Impact on the masterplan layout."*

Response to Issue Raised in DCC Submission

Site 31 of the Ballymun LAP is located on the western side of Ballymun Road to the north of Santry Cross as shown in Figure 2-11-24. (Note: the location in question is at the southeast corner, not the southwest corner). The Proposed Scheme will require acquisition of a very small area at these lands for the provision of a cycle track and an island bus stop as shown in Figures 2-11-25 and 2-11-26. The impact of this very minor encroachment into the undeveloped lands in the ownership of DCC will be insignificant and can be incorporated into the design of the future proposed site development. It should be noted that earlier in the DCC submission (on page 13) they have expressed a desire for the extension of the "tree-lined colonnade" along the full length of Ballymun Road which will require a setback of the proposed future building frontage to accommodate new street trees on the western side at Site 31. The temporary land to be acquired is needed to provide a replacement boundary fence along the edge of the small plot of land to be permanently acquired, and this will return to DCC once the construction is completed. It may not be required if DCC decides that it is not necessary to replace the existing boundary railing.

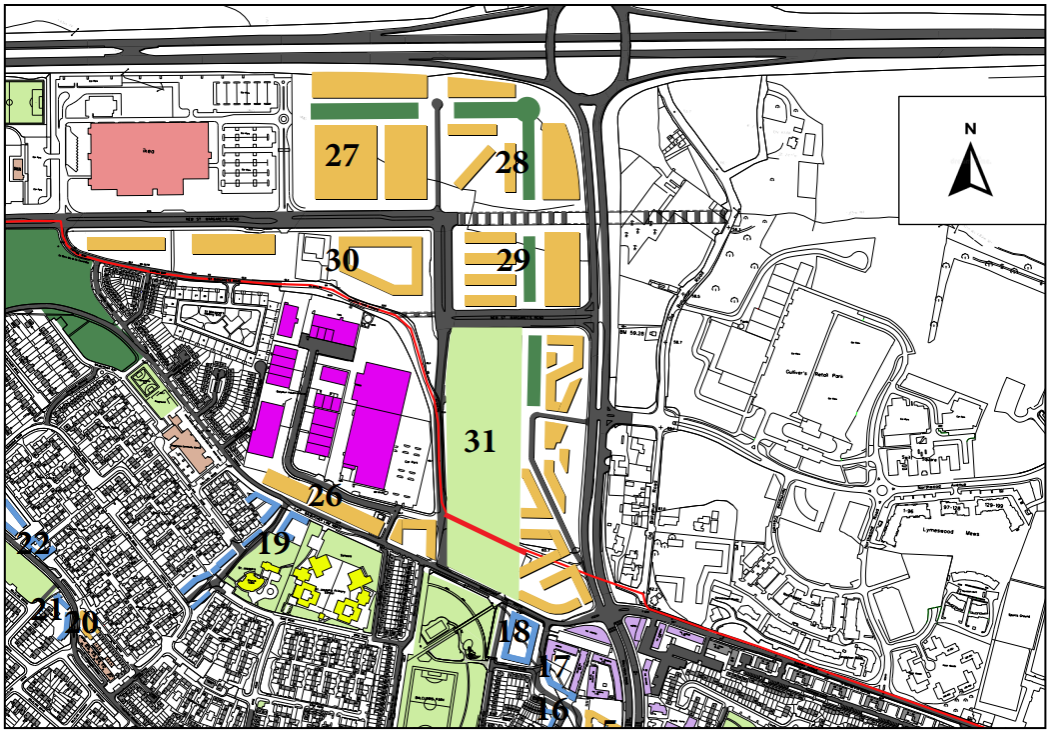


Figure 2-11-24: Extract from Ballymun Local Area Plan Map (Figure 11 Masterplan Map on page 41) showing Site 31

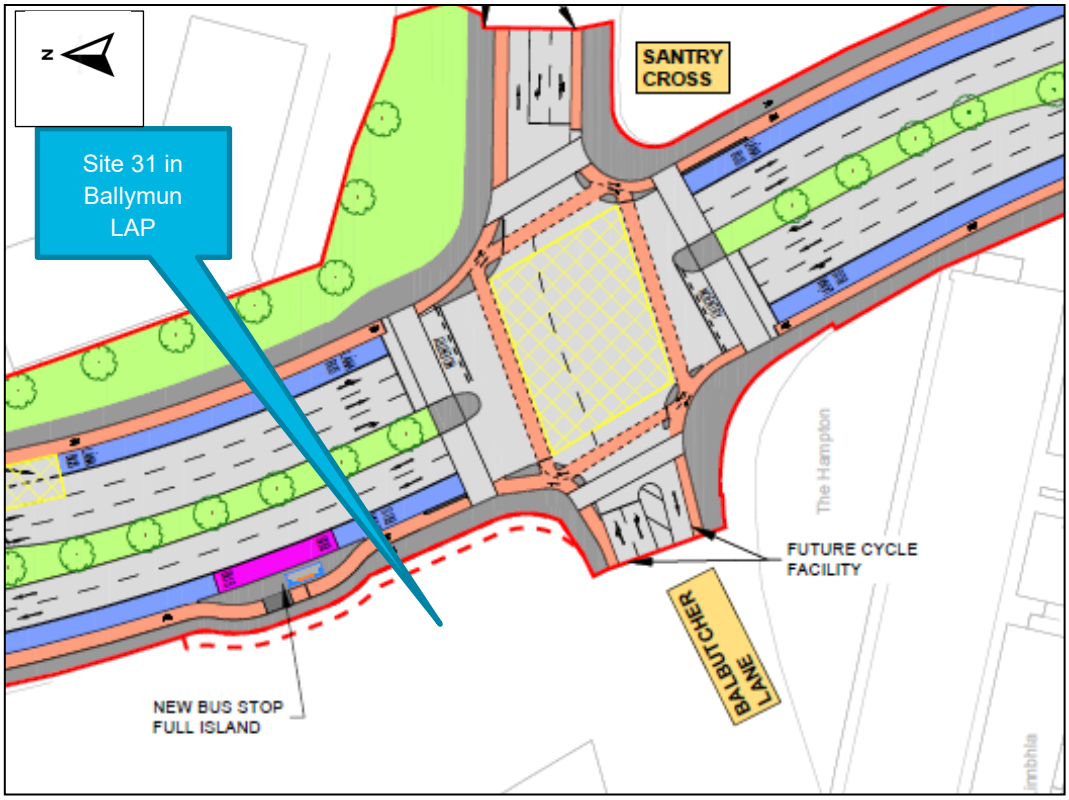


Figure 2-11-25: Extract from General Arrangement Drawing Sheet 2 at Site 31 on Ballymun Road

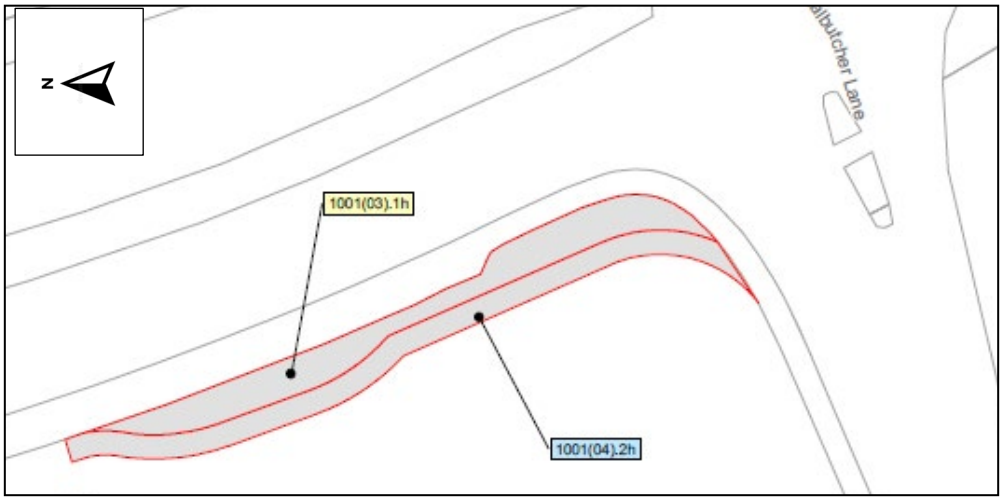


Figure 2-11-26: Extract from CPO Map Sheet 1 at Site 31 on Ballymun Road

General Arrangement Drawing Sheet 6

Issue Raised in DCC Submission

The DCC submission on page 28 is as follows:

> *"On street car parking layout along the western side of Ballymun Road opposite Our Lady of Victories Church and between 165 and 139 Ballymun Road should take cognisance of existing driveways and dishing required for same which extends 900mm from either side of the vehicular access point.*
>
> *Regarding the local shops at the junction of Ballymun Road and St. Pappin Road, it is not clear what the exact Impact of scheme works will be on the access and parking arrangements to the shops, particularly the two access points along Ballymun Road ."*

Response to Issue Raised in DCC Submission

The Proposed Scheme on Ballymun Road at Our Lady of Victories Schools and Church is shown in Figure 2-11-27 extracted from GA Drawing Sheet 6. This clearly indicates that the proposed new on-street parking is arranged in bays between driveways with gaps for access to and from the houses.

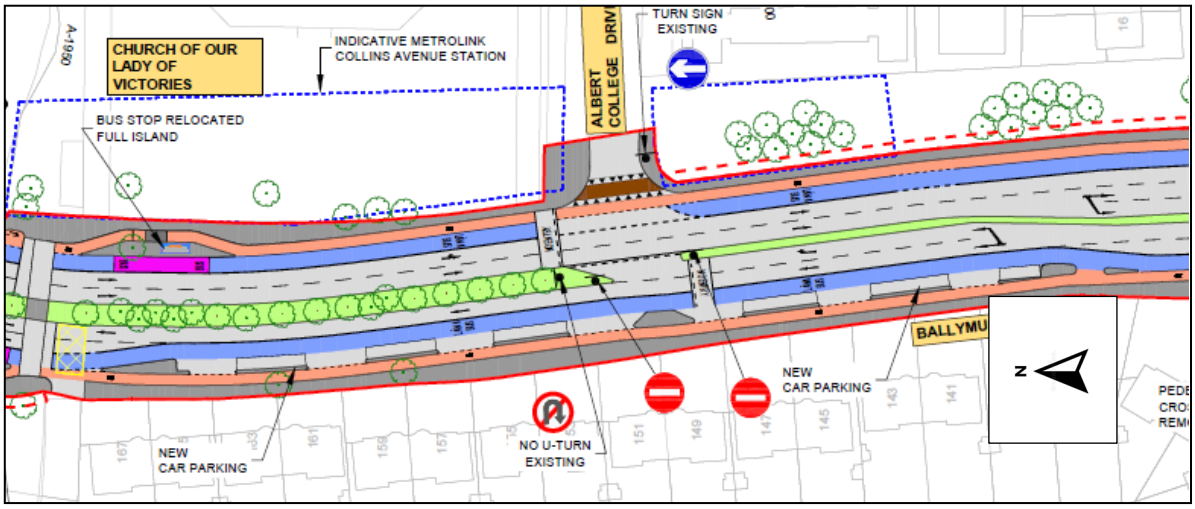


Figure 2-11-27: Extract from General Arrangement Drawing Sheet 6 at Our Lady of Victories Church

The Proposed Scheme at the shops beside the St. Pappin Road junction is shown in Figure 2-11-28 extracted from GA Drawing Sheet 6. It is intended that the existing two access points to the parking area at these shops will be retained with crossings over the public footpath as at present as shown in Figure 2-11-29.

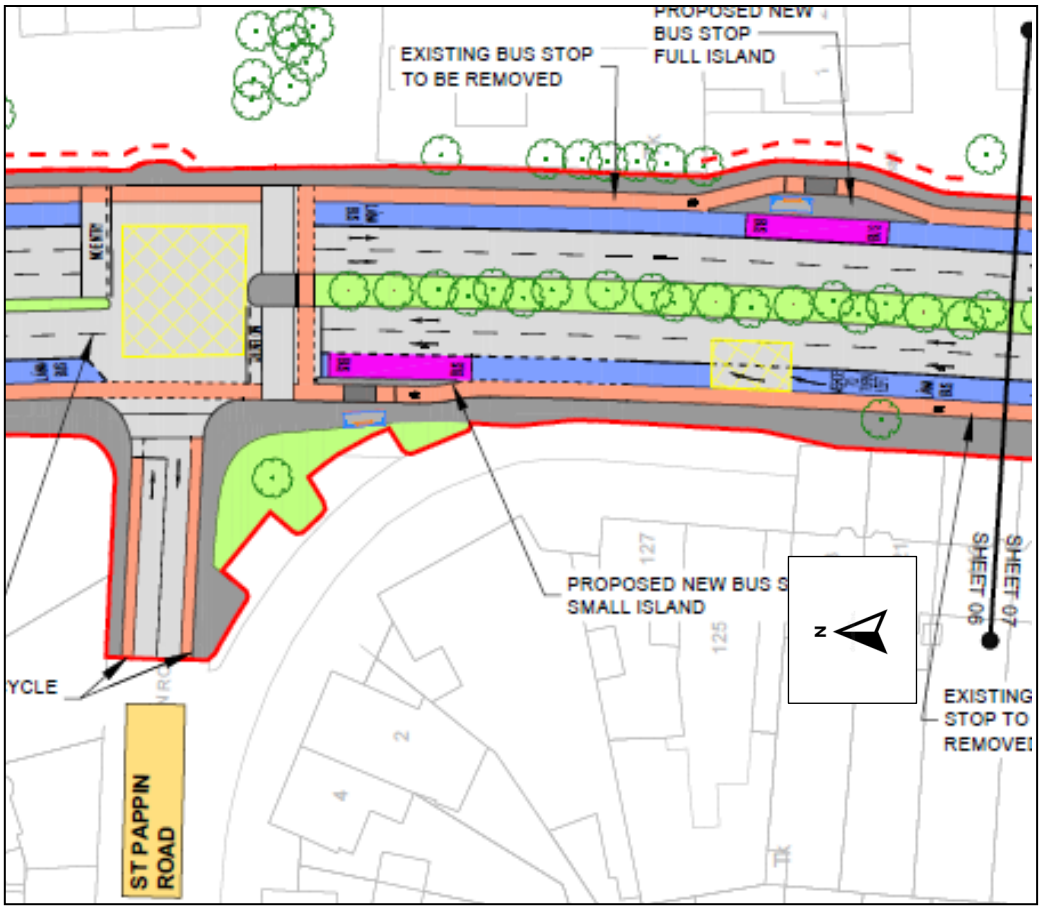


Figure 2-11-28: Extract from General Arrangement Drawing Sheet 6 at Shops beside St. Pappin Road

Figure 2-11-29: Existing Accesses from Ballymun Road to the Shops beside St. Pappin Road

General Arrangement Drawing Sheet 8

Issues Raised in DCC Submission

The DCC submission on page 28 raises several issues about the Proposed Scheme as follows (with a numbering system introduced here for ease of reference:

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

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

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

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

Several of these issues also apply to Sheets 9, 10 and 11.

Responses to Issues Raised in DCC Submission

a) Cycle Tracks on St. Mobhi Road

The typical proposed cross section on St. Mobhi Road is shown in Figure 2-11-30 extracted EIAR Volume 1, Part 3, Section 04, Typical Cross Sections Sheet 5.

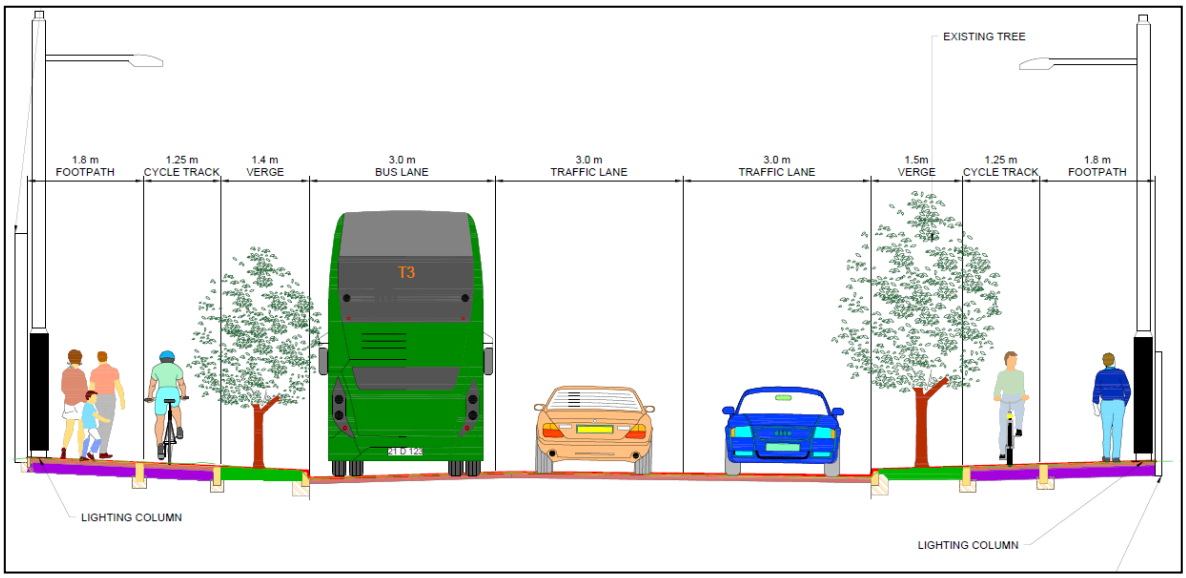


Figure 2-11-30: Extract from Typical Cross Section Sheet 5 at St. Mobhi Road

As may be seen in the typical cross-section the space available along St. Mobhi Road is very constrained if the existing mature street trees are to be retained, which is important to protect the high-quality landscape of the tree-lined street. If the cycle tracks were to be located on the road side of these trees, then it would be necessary to remove the existing southbound bus lane, which would undermine the primary objective of the core bus corridor to ensure continuous bus priority, and that is not appropriate. The proposed scheme will therefore insert the cycle tracks behind the trees beside the footpaths which will be narrowed to 1.8m, which is consistent with the minimum requirements of the Design Manual for Urban Roads and Streets in locations such as this with low numbers of pedestrians. As is indicated on the typical cross section an embedded kerb separator is proposed to delineate the separation of the cycle track from the footpath. This kerb line will form a tactile separator, and there are numerous suitable kerb products available for this purpose of which an example is shown in Figure 2-11-31. If the cycle track level were lower than the footpath level, this would require deeper excavation along the verge side which would likely damage the roots of the existing trees, and possibly cause the trees to eventually die.

Strasbourg, France

Carrickmines, Dublin

Figure 2-11-31: Example of a tactile separator kerb between the footpath and cycle track

b) The rationale for having both single lane and two way cycle tracks on Griffith Avenue

As described earlier in response to the same query from the Traffic Division of DCC, there is a primary school located on Griffith Avenue a very short distance to the west of the Ballymun Road junction. The purpose of the short length of two-way cycle track on the southern side of Griffith Avenue is to enable school children to cycle eastwards to St. Mobhi Road and the adjoining large residential area without need to cross the main road twice. Such an arrangement exists on the Stillorgan Road as shown in Figure 2-11-32.

Figure 2-11-32: Example of a two-way cycle track near a school (Stillorgan Road) – Google Earth

c) *Inbound cycle track cuts through the footpath at the Junction of Ballymun Road and St.* Mobhi *Road*

The Proposed Scheme layout is shown in Figure 2-11-33 where there is a right-turn pocket for cyclists at the junction to cross from the eastern to the western side of Ballymun Road. The proposed footpath along this section will be 1.8m wide, similar to the rest of St. Mobhi Road. In the detailed design development there is the potential for refinement to widen the footpath a little through adjustment of the cycle track alignment locally.

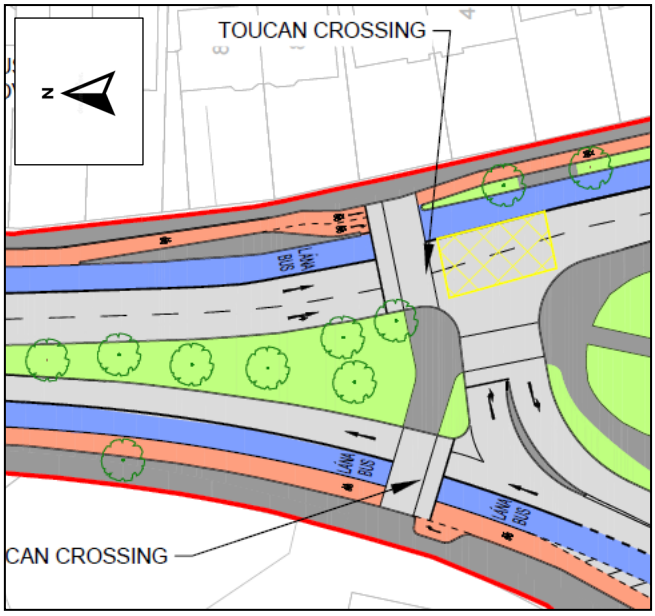


Figure 2-11-33: Extract from General Arrangement Drawing Sheet 8 at Junction of Ballymun Road and St. Mobhi Road

d) Footpaths *on St. Mobhi Road*

As explained earlier for Item (a) it is necessary to narrow the existing wide footpaths to accommodate the cycle tracks behind the trees. This is already the existing arrangement on the eastern side of St. Mobhi Road south of the junction with Home Farm Road. In fact in the proposed scheme it is proposed to widen that section of footpath from 1.5m to 1.8m between Home Farm Road and Scoil Chaitríona by narrowing the existing cycle track to 1.25m.

General Arrangement Drawing Sheet 9

Issues Raised in DCC Submission

The DCC submission on page 29 is as follows:

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

This query is repeated for Sheet 10.

Response to Issue Raised in DCC Submission

This comment refers to the section of St. Mobhi Road where there are 3 schools and two sports clubs as well as a third level college on the eastern side of the road as shown in Figure 2-11-34. The rationale for this arrangement is to cater for large numbers of pedestrians and cyclists along that section of road who link to and from the River Tolka corridor to the south and onwards through Arthur Griffith Park that has links eastwards to Drumcondra. It also connects with the proposed cycle track westwards along the River Tolka. Like the proposal for Griffith Avenue, the 2.5m wide two-way cycle track will avoid the need for northbound cyclists to cross the main road twice in short succession. The adjoining footpath will be generously wide at 2.5m to accommodate groups of pedestrians, as are shown in the photograph in Figure 2-11-35.

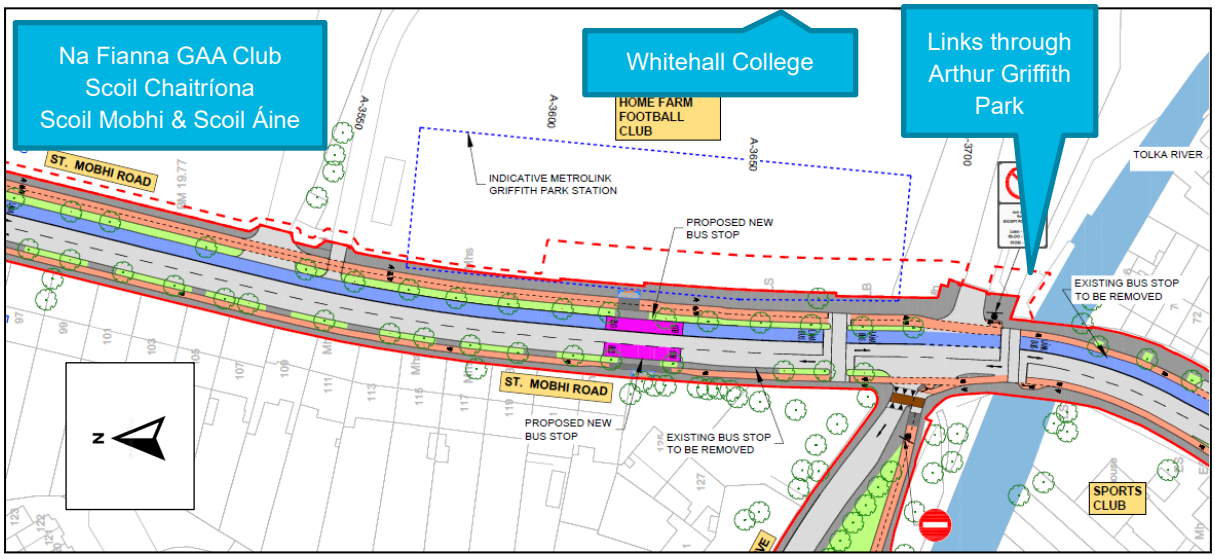


Figure 2-11-34: Extract from General Arrangement Drawing Sheet 8 at Junction of Ballymun Road and St. Mobhi Road

Figure 2-11-35: Heavy Pedestrian Traffic near the schools on St. Mobhi Road towards the River Tolka

General Arrangement Drawing Sheet 10

Issues Raised in DCC Submission

The DCC submission on page 29 repeats two issues in relation to Sheet 9 and has one additional issue as follows:

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

Response to Issue Raised in DCC Submission

The Proposed Scheme layout is shown in Figure 2-11-36, with a two-way cycle track through the linear park area between St. Mobhi Drive and the River Tolka. As outlined in the *Greater Dublin Area Cycle* Network *Plan* there is an objective to develop a longer greenway along the River Tolka, of which this element of the proposed scheme would form a part. Preferably such a greenway will be located away from existing roads and through park areas as is proposed in the BusConnects scheme.

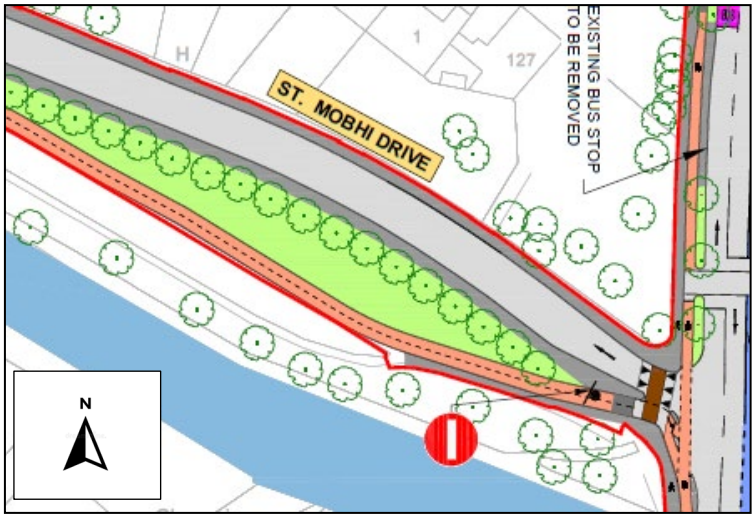


Figure 2-11-36: Extract from General Arrangement Drawing Sheet 10 at St. Mobhi Drive

On St. Mobhi Drive there is regular parking along the southern side of the road as shown in Figure 2-11-37. If as is suggested in the DCC submission, the proposed cycleway was to be relocated onto the footpath on the southern side of St. Mobhi Drive, this would give rise to a clash between cyclists and people accessing cars parked along that side of the road. Instead the Proposed Scheme avoids this issue routing the cycleway to follow one of the two existing paths through the park area, which would be widened a little to suit. Whatever arrangement is provided will require pedestrians to cross the cycle route at each end in any event, and these will be pedestrian priority zones, as is usual on greenways.

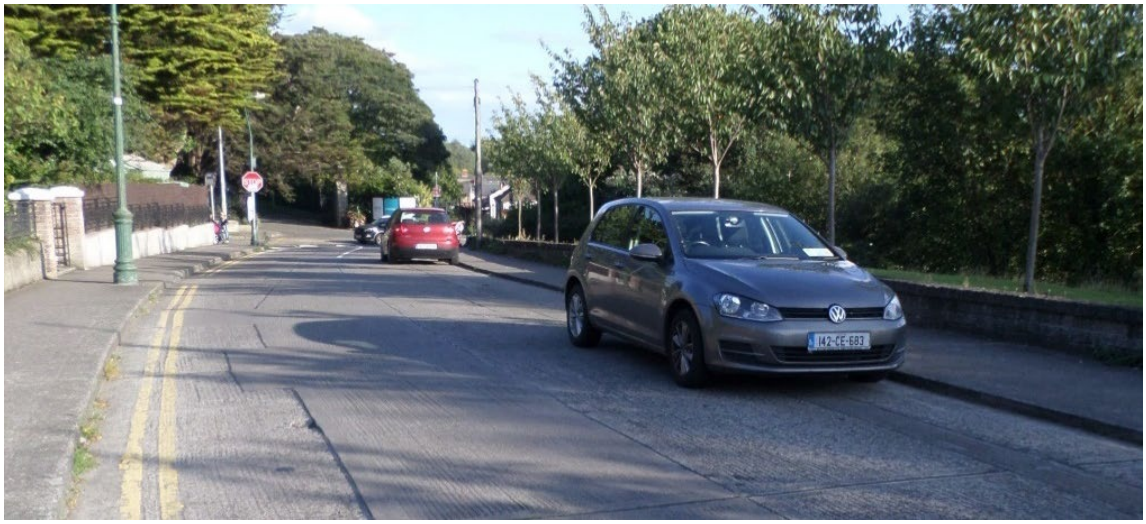


Figure 2-11-37: Car Parking on southern side of St. Mobhi Drive

General Arrangement Drawing Sheet 11

Issues Raised in DCC Submission

The DCC submission on page 29 is as follows:

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

Response to Issue Raised in DCC Submission

The Proposed Scheme layout is shown in Figure 2-11-38, with an island bus stop and the northbound cycle track passing behind the bus shelter. The proposed bus stop island is 3m wide in accordance with the Preliminary Design Guidance Booklet for BusConnects. There is an existing 1.5m wide partial layby in front of the existing bus stop that will be removed in the proposed scheme. This will allow for the existing bus shelter to be moved outwards from the building frontage, which provides the space for the proposed cycle track to pass behind the bus shelter at the existing location of the bus shelter. In effect this means that the footpath area in front of the shops and behind the bus shelter will increase slightly from 2.7m to 2.95m wide, which provides comfortable space for all pedestrian movements at the shops.

Figure 2-11-38: Extract from General Arrangement Drawing Sheet 11 at Southern end of St. Mobhi Road

At the northern end of the row of shops in front of No.163a where there is a garage, there is additional footpath area outside of the red line boundary for the proposed scheme as shown in Figure 2-11-38. The true footpath will therefore be wider than may be apparent on the drawing. It is also possible in the detailed design to adjust the alignment of the proposed cycle track slightly to widen the footpath a little at this corner.

General Arrangement Drawing Sheets 12 & 13

Issues Raised in DCC Submission

The DCC submission on page 29 is as follows:

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

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

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

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

Response to Issues Raised in DCC Submission

Issues (a) and (b): Cycle Route at Junction of Botanic Road and Prospect Way

The Proposed Scheme layout at the junction of Botanic Road and Prospect Way is shown in Figure2-11-39.

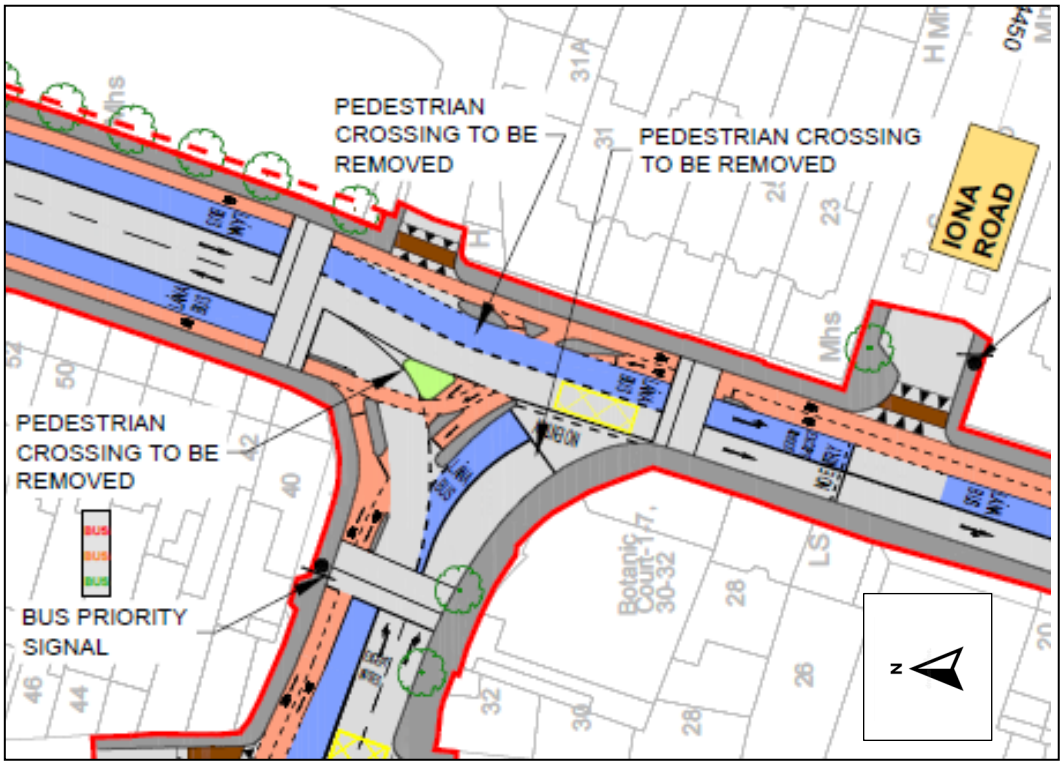


Figure 2-11-39: Extract from General Arrangement Drawing Sheet 12 at Botanic Road / Prospect Way Junction

There are many separate movements by 4 modes to be catered for at this key junction where the northbound cycle route along the eastern side of Botanic will split in two directions. In the design development at an earlier stage it included a set of toucan crossings linked to the existing triangular island in the middle of the junction. This arrangement would have involved extensive mixing of pedestrians and cyclists moving in numerous different directions. During the public consultations concerns were expressed about this arrangement and segregation of modes was suggested. That sensible idea has been adopted in the Proposed Scheme design, where the pedestrian crossings have been separated from the cycle crossings, and they will cross the road at different times in the traffic signal sequence.

The cycle movements in opposing directions will be signalled separately in a simple two-stage arrangement which will avoid conflicts and enable cyclists to move quickly through the junction.

Overall the signal staging will be quite simple with some degree of coincidental movements where they do not conflict. For example the southbound traffic turning right from Prospect Way can run at the same time as the cycle crossings. Traffic movements only require two signal stages overall, and the three pedestrian crossings will all run together while traffic and cyclists are stopped.

It is acknowledged that pedestrians will be deflected a little away from the direct desire lines, but the benefit is the avoidance of conflicts with any other movements. This is on balance the most appropriate way to resolve the various movements at this junction with full separation of modes for clarity and safety.

Issues (c) and (d): Bus Stops on Prospect Road

The Proposed Scheme layout at the bus stops on Prospect Road is shown in Figure 2-11-40.

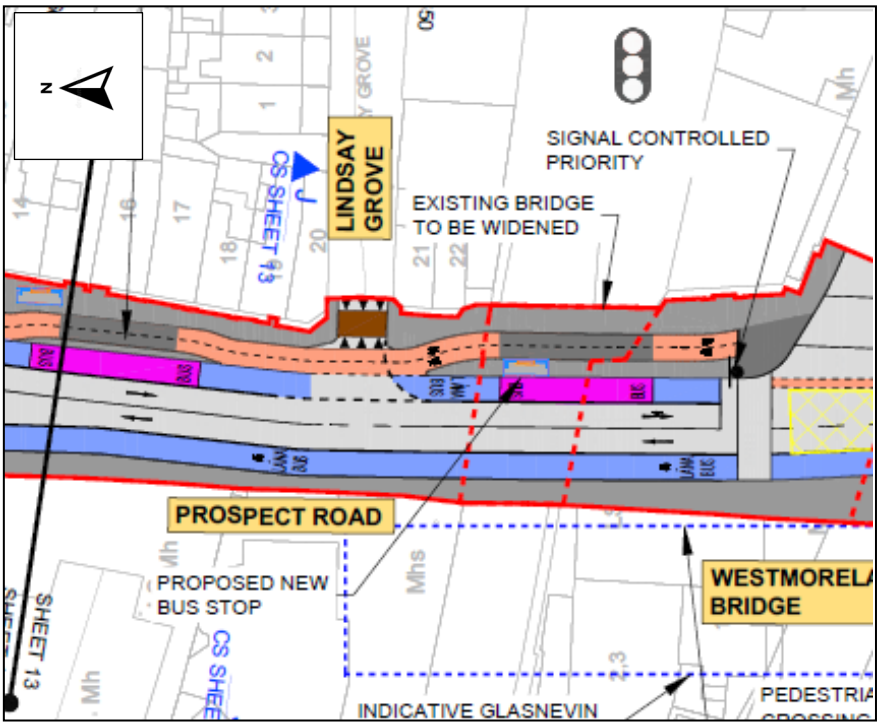


Figure 2-11-40: Extract from General Arrangement Drawing Sheet 13 at Prospect Road

(The bus stops referred to in the DCC submission are shown on Sheet 13 rather than Sheet 12).

The reason for the two closely spaced bus stops at this location is to provide enough capacity for the expected large numbers of passengers that will alight from buses on the two BusConnects Spine Routes E and F that overlap briefly on Prospect Road and where there will be interchange with both the proposed Metrolink and DART West railway services at the proposed Glasnevin Station on the opposite side of the road. Boarding passenger numbers in the southbound are expected to be lower as the Metrolink route will serve the same broad catchment towards the city centre so that interchange between modes will be largely from bus to metro or DART, and less in the other direction on the southbound side.

Space is limited at the northern bus stop so that only the narrow island bus stop can be accommodated. In this context cyclists will be required to stop to allow alighting and boarding bus passengers to cross the cycle track, possibly with activation of the proposed pelican traffic signal. Where the main bus stop activity is for alighting passengers, this will occur in short time periods of concentrated movements and the width of the island is of less relevance than for slower boarding activity with associated waiting. A full island bus stop can be provided at the southern stop where the bridge will be widened to provide a lot more space.

General Arrangement Drawing Sheets 13 & 14

Issues Raised in DCC Submission

The DCC submission on page 30 is as follows:

a) *"Two way cycle track merges with footpath at Whitworth Road. It is illegal to cycle on footpaths. A shared footpath and cycling surface appear to be indicated south of the junction with Whitworth Road completely bisecting the pedestrian area. Proximity to NCBI premises means there Is a likelihood of visually impaired users In this area. Such an alignment may prove difficult for these users to safely navigate. Shared surfaces of this nature are not favoured In the National Cycle Manual. Further Information regarding the proposed layout would be useful."*

b) *"At Phibsborough Shopping Centre the scheme takes in part of the shopping centre site reducing the existing car parking area fronting onto Phibsborough Road. There Is concern*

regarding the Impact on parking and access layout. It Is not clear If adequate space is provided in the car park for safe circulation. It Is also noted that the existing servicing arrangements include service vehicles entering from Phibsborough Road and servicing from this car park. It Is not clear If the revised access will accommodate the swept path/auto tracking for service vehicles and whether the revised layout can accommodate the circulation of service vehicles through the car park."

Response to Issues Raised in DCC Submission

Issue (a): Cycle Route at Whitworth Road

The Proposed Scheme layout at the junction of Botanic Road and Whitworth Road is shown in Figure 2-11-41.

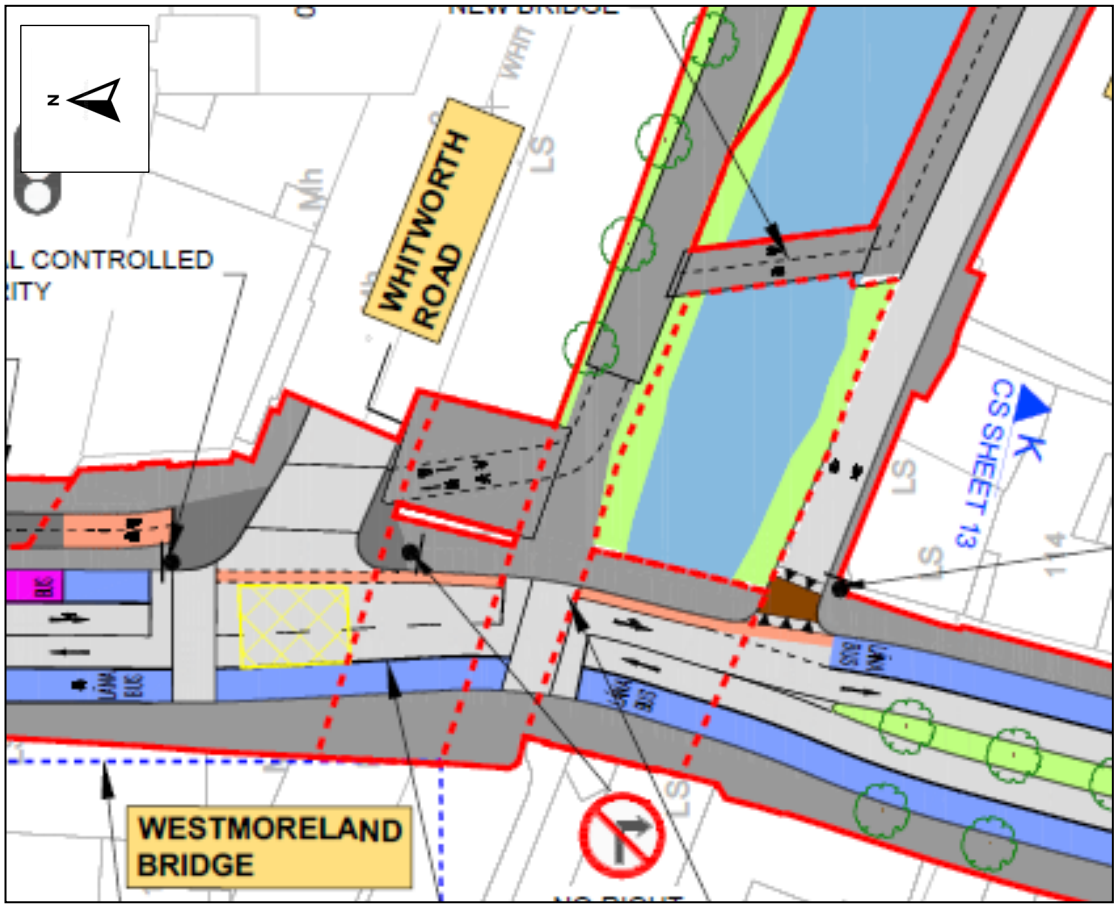


Figure 2-11-41: Extract from General Arrangement Drawing Sheet 13 at Whitworth Road

There is a transition at this location where the segregated north-south cycle route will intersect the shared use east-west Royal Canal Greenway. This transition from segregation to shared use is located on the northern side of the Whitworth Road junction where southbound cyclists will enter a pedestrian-priority zone at the waiting areas for the crossings of both Whitworth Road and Prospect Road. With the complexity of pedestrian and cyclist movements in multiple directions at this location it would not be feasible to provide segregation of modes. Such shared arrangements are the norm on greenways and extend for very long distances. The Royal Canal Greenway is a shared route further west from Ashtown to Castleknock (and also for 110km from Maynooth to Athlone), as is the Grand Canal Greenway from Inchicore to Adamstown. An example of a similar shared use area is shown in Figure 2-11-42.

Figure 2-11-42: Example of a Pedestrian Priority Area on the Dublin Bay Route at Dollymount / Raheny (at St. Anne's Park)

Shared-use areas require cyclists to give priority to cyclists and are implicitly required at mixing zones and crossings. The principal is inherent in toucan crossings. Visually impaired pedestrians will be present anywhere and are not unique to the area near the NCBI on Whitworth Road. They are safeguarded by the legal obligation for cyclists to proceed with care and to give priority to all pedestrians. In line with the National Cycle Manual shared use areas have been largely avoided in the Proposed Scheme and are only included where necessary and unavoidable.

Issue (a): Phibsborough Shopping Centre

The design team has given careful consideration to the needs for access and loading at the shopping centre, including consultations with the property owner and the main tenant Tesco to determine the requirements for large vehicles to make deliveries to the supermarket. The design has been tested for this activity and is satisfactory in that regard.

General Arrangement Drawing Sheet 14

Issues Raised in DCC Submission

The DCC submission on page 30 is as follows:

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

Response to Issues Raised in DCC Submission

The notes on the drawing refer to two granite pillars at the back of the footpath on North Circular Road that are heritage items. The comment by DCC therefore has no relevance.

General Arrangement Drawing Sheets 15, 16, 17 & 18

Issues Raised in DCC Submission

The DCC submission on page 30 is as follows:

> *"Short sections (c 50m) of outbound cycle track merging with bus lanes seem unnecessary over such short distances. The purpose of their inclusion Is not clear."*

The same comment is repeated for 4 drawing sheets.

Response to Issues Raised in DCC Submission

This aspect of the Proposed Scheme is explained in EIAR Chapter 4, Section 4.5.3.5 as follows:

> *"Some short lengths of cycle track will be provided where there are three gaps in the bus lanes along R108 Phibsborough Road to accommodate cyclists who choose to remain on the bus corridor instead of taking the alternative route to the east".*

These short sections of cycle track are therefore essential to provide a continuous facility for cyclists that avoids sharing the general traffic lane. This applies to all such locations across the four drawing sheets.

General Arrangement Drawing Sheet 17

Issues Raised in DCC Submission

The DCC submission on page 30 is as follows:

> *"Parking that is being removed from Anne Street North does not appear to be annotated on drawings."*

Response to Issues Raised in DCC Submission

This comment refers to a quiet street in the Markets Area on the proposed cycle route. Existing parking on these streets is not shown on the general arrangement drawing, but it is not proposed, nor necessary, to remove any of the existing parking along the *Markets Cycle Route*.

General Arrangement Drawing Sheet 18

Issues Raised in DCC Submission

The DCC submission on page 30 is as follows:

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

Response to Issues Raised in DCC Submission

The Proposed Scheme has been subjected to a Stage 1 Road Safety Audit which is included in Appendix M of the Preliminary Design Report (Supplementary Information) which did not raise an issue about these proposed parking spaces on Church Street Lower.

General Arrangement Drawing Sheet 20

Issues Raised in DCC Submission

The DCC submission on page 31 is as follows:

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

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

Response to Issues Raised in DCC Submission

Response to Issue (a)

The proposed road layout at this location is shown in Figure 2-11-43.

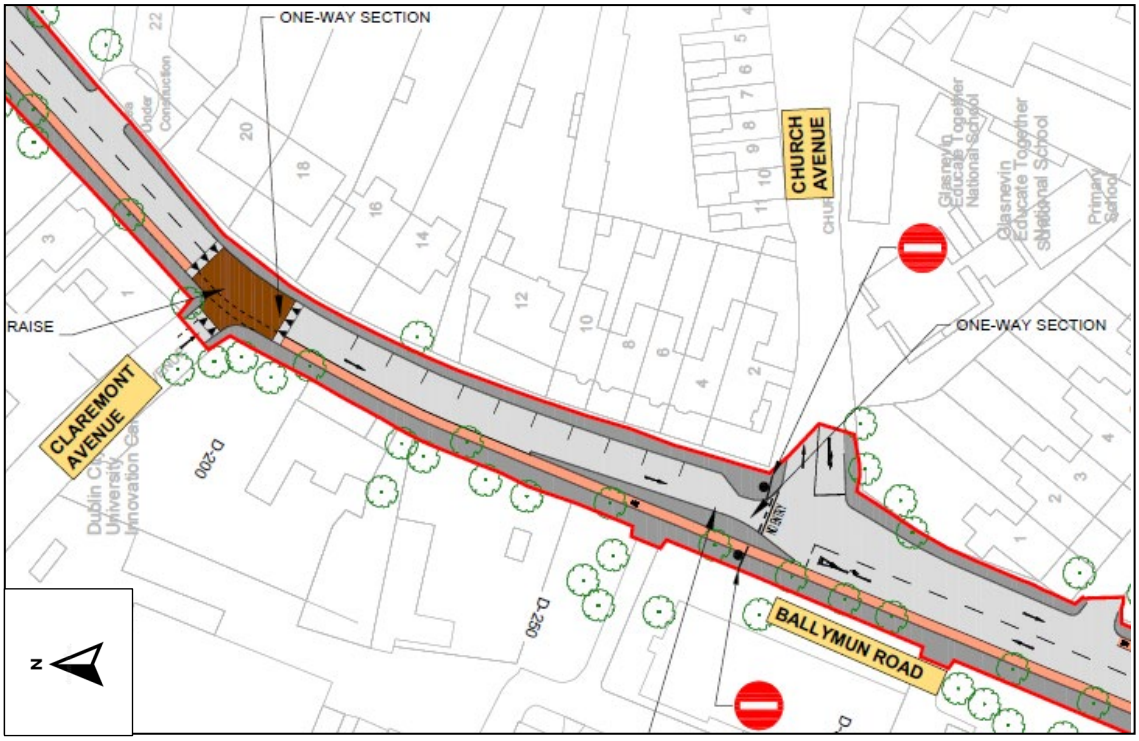


Figure 2-11-43: Extract from General Arrangement Drawing Sheet 20 at Ballymun Road (south)

In the Proposed Scheme this section at the southern end of Ballymun Road will be restricted to one-way traffic in the southbound direction. The existing northbound cycle lane will be retained along this part of Ballymun Road, and it will be upgraded to a segregated cycle track in the same position beside the footpath which will not be impacted upon. The DCC comment refers to a proposed new traffic island outside the cycle track that is intended to close off the northbound traffic lane for the one-way section. It is not a footpath and therefore the DCC comment is not relevant.

Response to Issue (b)

This comment refers to the junction of Glasnevin Hill, Ballymun Road and Old Finglas Road at the Met Éireann office as shown in Figure 2-11-44. There is an existing northbound cycle lane on Glasnevin Hill with an advance stop line waiting area in front of the single traffic lane.

Figure 2-11-44: Existing Layout at junction of Glasnevin Hill, Ballymun Road and Old Finglas Road

In the Proposed Scheme, as shown in Figure 2-11-45, an advance cycle signal will be provided to allow for cyclists to turn right ahead of traffic, and therefore not have wait in an exposed position in the middle of the road.

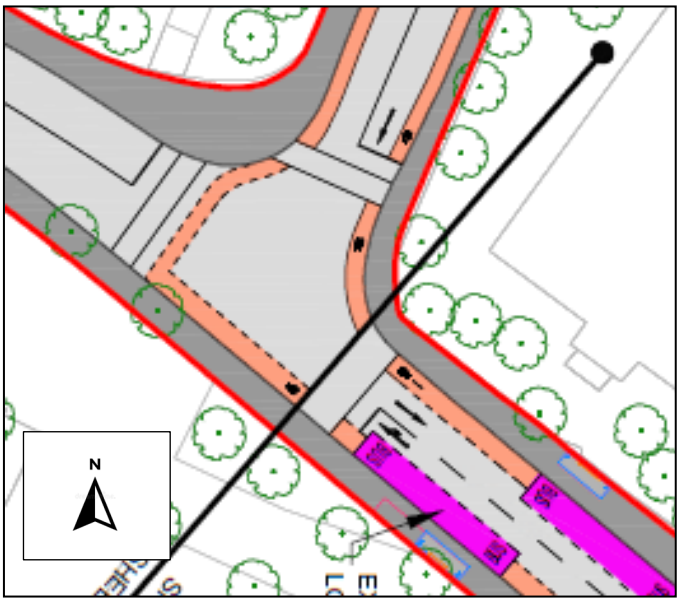


Figure 2-11-45: Extract from General Arrangement Drawing Sheet 20 at Met Office Junction

General Arrangement Drawing Sheet 21

Issues Raised in DCC Submission

The DCC submission on page 31 is as follows:

> *"At entrance to Bon Secours hospital, new bus stop Is annotated but not shown on layout."*

Response to Issues Raised in DCC Submission

The note on the drawing is incorrect and it is not intended to relocate the existing southbound bus stop that is located at the Met Éireann office further west.

General Arrangement Drawing Sheet 30

Issues Raised in DCC Submission

The DCC submission on page 31 is as follows:

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

Response to Issues Raised in DCC Submission

In general in the Proposed Scheme along Finglas Road the cycle track is located on the traffic side of the verge. However, for a short section at The Griffith on the western side of the road the trees in the verge are positioned closer than usual to the kerb. There is more space available on the footpath side of the verge where the boundary was set back during the development of the apartments at The Griffith. Therefore it was considered in the design development that the protection and retention of the existing street trees would be more certain if the cycle track were located beside the footpath. As previously stated for St. Mobhi Road, a tactile kerb separator will be provided between the footpath and the cycle track.

General Arrangement Drawing Sheet 32

Issues Raised in DCC Submission

The DCC submission on page 31 is as follows:

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

Response to Issues Raised in DCC Submission

The Proposed Scheme at this location is shown in Figure 2-11-46. The DCC comment is accepted and in the detailed design of the junction the layout can be refined to reduce the island size a little so as to widen the footpath slightly.

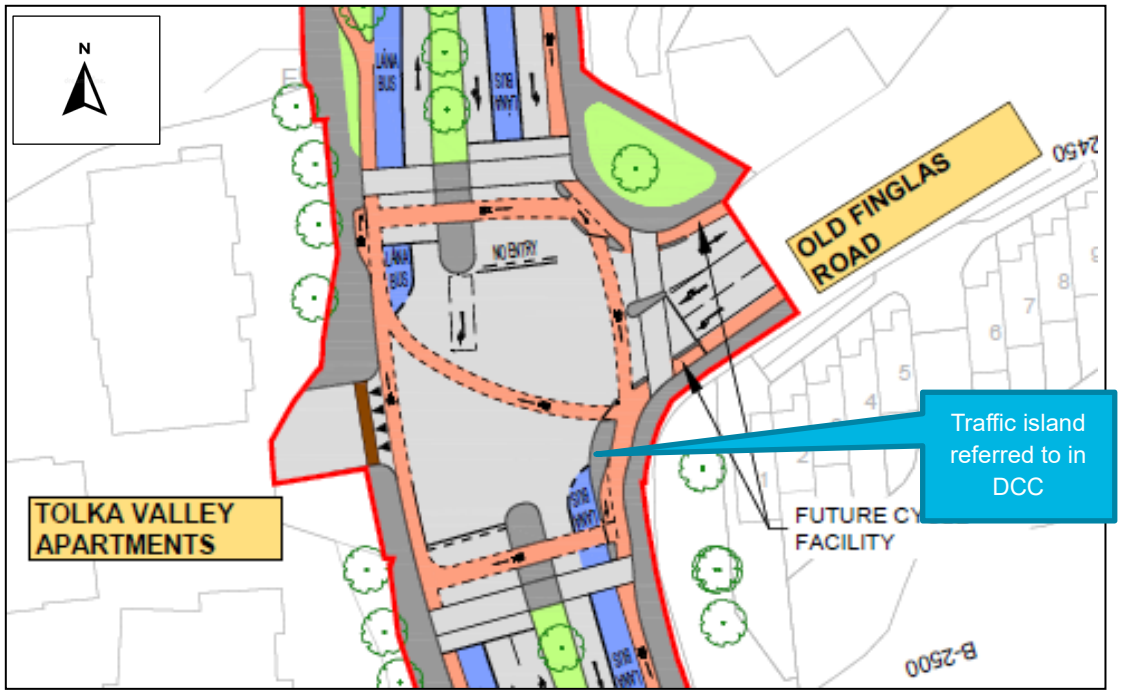


Figure 2-11-46: Extract from General Arrangement Drawing Sheet 32 at Old Finglas Road Junction

General Arrangement Drawing Sheet 36

Issues Raised in DCC Submission

The DCC submission on page 31 is as follows:

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

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

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

Response to Issues Raised in DCC Submission

The Proposed Scheme at this location is shown in Figure 2-11-47. A new car park is proposed opposite Glasnevin Cemetery as replacement for the existing on-street parking that will be removed to accommodate a new northbound bus lane. Currently cars reverse in or out of the parking spaces from the traffic lane. With the proposed separate car park the traffic interactions across the bus lane will be minimised to just 2 crossing points at the entrance and exit.

The existing cycle track is deviated behind the parking spaces, but pedestrians need to cross the cycle track at each parking space to reach the footpath on the park side of the cycle track. In the proposed scheme, the cycle track will be deviated a little further towards the park around the new car park which is wider than the existing parking. This is not a "lengthy deflection" as described in the DCC submission and it will make little or no difference to cyclists. If the cycle track were routed along the road edge as suggested by DCC, then cyclists would interact with traffic at two locations, which is avoided in the proposed scheme.

The position of the cycle track behind the footpath is proposed to eliminate the interactions between cyclists and pedestrians coming to and from the car park. These pedestrians will access the footpath directly from the car park without having to cross the cycle track. For the small number of pedestrians walking along Finglas Road, they will cross the cycle track at two locations at each end of this section. Thus the proposed scheme will have the benefit of greatly reducing interactions between pedestrians and cyclists all along the parking area to just two clearly defined crossing points where there will be much fewer interactions than at present for people going to and from the cemetery on the opposite side of the road.

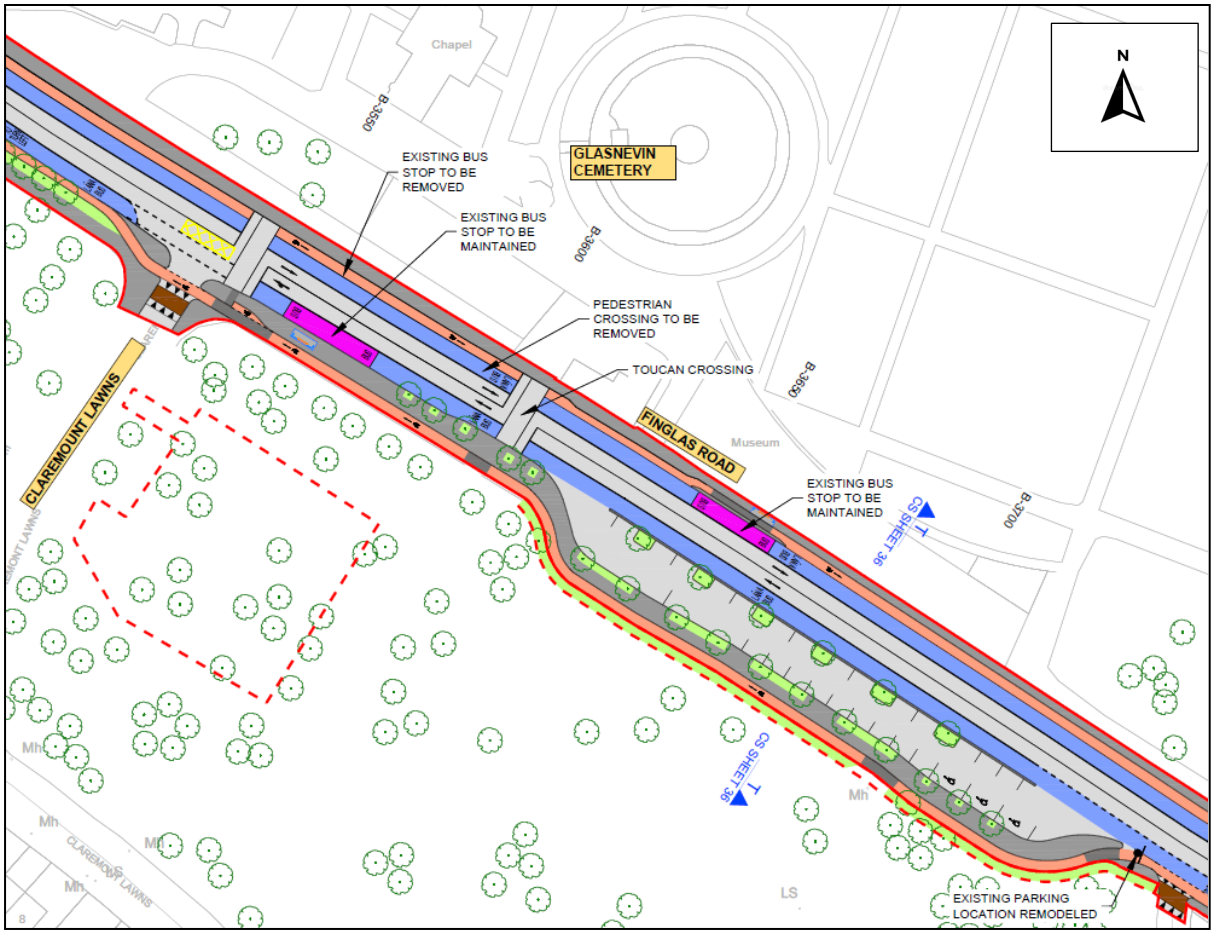


Figure 2-11-47: Extract from General Arrangement Drawing Sheet 36 at Claremont Lawns & Glasnevin Cemetery

In the proposed car park the one-way (east to west) traffic aisle will be 4m wide which is more than sufficient for vehicles to move in and out of the parallel parking spaces.

Typical Cross Section Drawings

Issues Raised in DCC Submission

The DCC submission on pages 31/32 includes a number of comments about the Typical Cross Sections that are largely repeats of earlier comments on the corresponding General Arrangement Plan Drawings:

> *"No Section drawing has been provided for GA Sheet 8*
>
> ***Section E-E (GA Sheet 9), Section F-F (GA Sheet 10), Section G-G (GA Sheet 11)***
>
> *The cycle track width indicated will only allow single file cycling. No grade separation or tactile warning is indicated between the cycle track and footpath. The narrowness of the cycle track means that overtaking cyclists may impinge on footpath bringing them potentially Into conflict with pedestrians. Consideration should be given to routing the cycle track outside (i.e. on the carriageway side of the verge.*
>
> ***Section Q-Q (/GA Sheet 30)***
>
> *A grade separation has been indicated between the cycle track and surrounding footpath and green verge. Such a vertical alignment would result in surface water, litter and fallen leaves accumulating in the cycle track reducing cyclist ride quality and making maintenance difficult. Consideration should be given to routing the cycle track outside (i.e. on the carriageway side of) the verge.*

Section T-T (GA Sheet 36)

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

Responses to Issues Raised in DCC Submission

The proposed scheme design is consistent along most of the length of St. Mobhi Road that extends across General Arrangement Drawings Sheets 8 to 11. Therefore Section E-E on Sheet 9 is also applicable to Sheet 8 on the eastern side of the road.

As has been responded earlier to the comments on General Arrangement Drawings Sheets 8 to 11, the space available along St. Mobhi Road is restricted and the proposed cycle tracks will be narrow and single-file cycling will be necessary. This is described in EIAR Chapter 4, Section 4.5.2.5. It should be clear to DCC that wider cycle tracks cannot be provided if the street trees are to be retained or alternatively requiring removal of the existing southbound bus lane which would not be appropriate for a scheme with the primary objective of increasing bus priority.

The query about Section Q-Q has largely been addressed in the earlier response to the comment about General Arrangement Drawing Sheet 30 which explained why it is proposed to locate the cycle track beside the footpath in front of The Griffith apartments. There is a significant longitudinal fall on Finglas Road which will ensure that surface water drainage flows southwards, and flooding of the cycle track cannot happen. As is shown in the Proposed Surface Water Drainage Works (EIAR Volume 4, Part 11) of which an extract is included in Figure2-11-48X, the proposed cycle track and adjoining footpath will drain into the verge at intervals where an infiltration area will be provided.

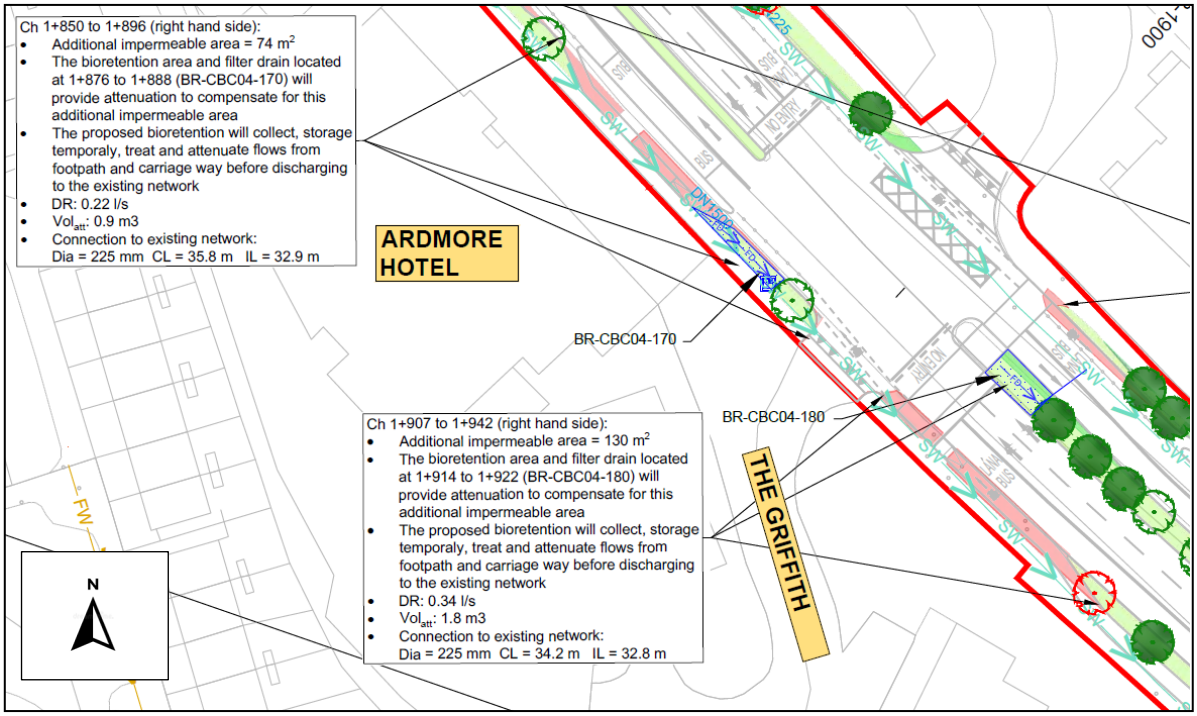


Figure 2-11-48: Extract from Surface Water Drainage Works Drawing Sheet 30

The query about Section T-T has largely been addressed in the earlier response to the comment about General Arrangement Drawing Sheet 36 which explained why it is proposed to locate the cycle track to the rear of the proposed car park beside the public park area at Claremont Lawns, indicated on the right in Figure 2-11-49. This arrangement of the cycle track below footpath level is no different to the existing situation on for example the Grand Canal Cycleway (constructed by DCC) where there is a separate system of pipes and gullies provided for the cycle track behind an upstand kerb as shown in Figure 2-11-50. The cycle track and footpath can drain to new tree pits along the edge of the proposed new car park in accordance with SuDS principles. Such a drainage system has been installed on North Wall Avenue, a new street in the Docklands area, and also at Windmill Lane in the South Docklands which was recently reconstructed.

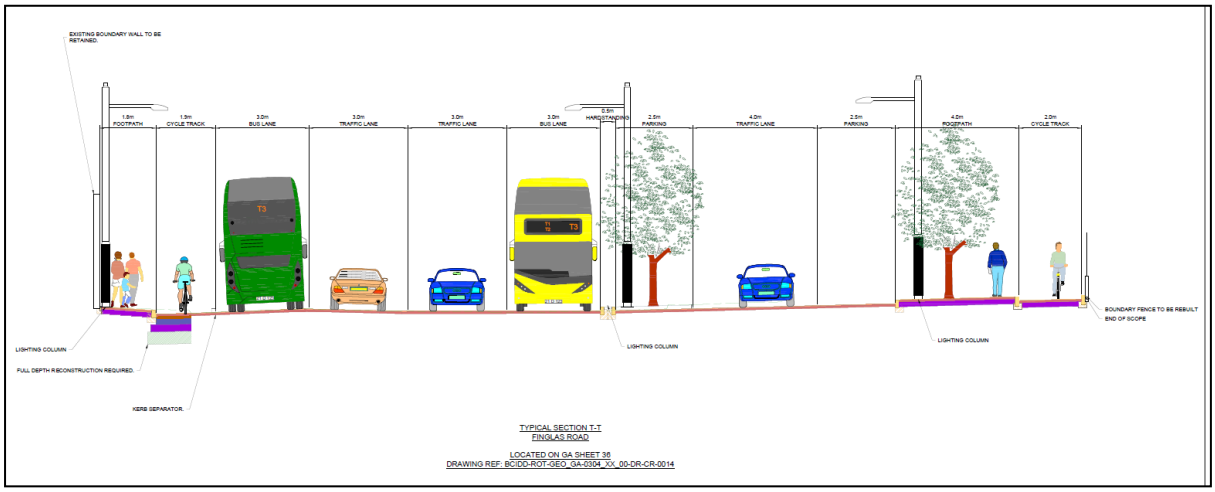


Figure 2-11-49: Extract from Typical Cross Sections Drawing Sheet 20 at Section T-T

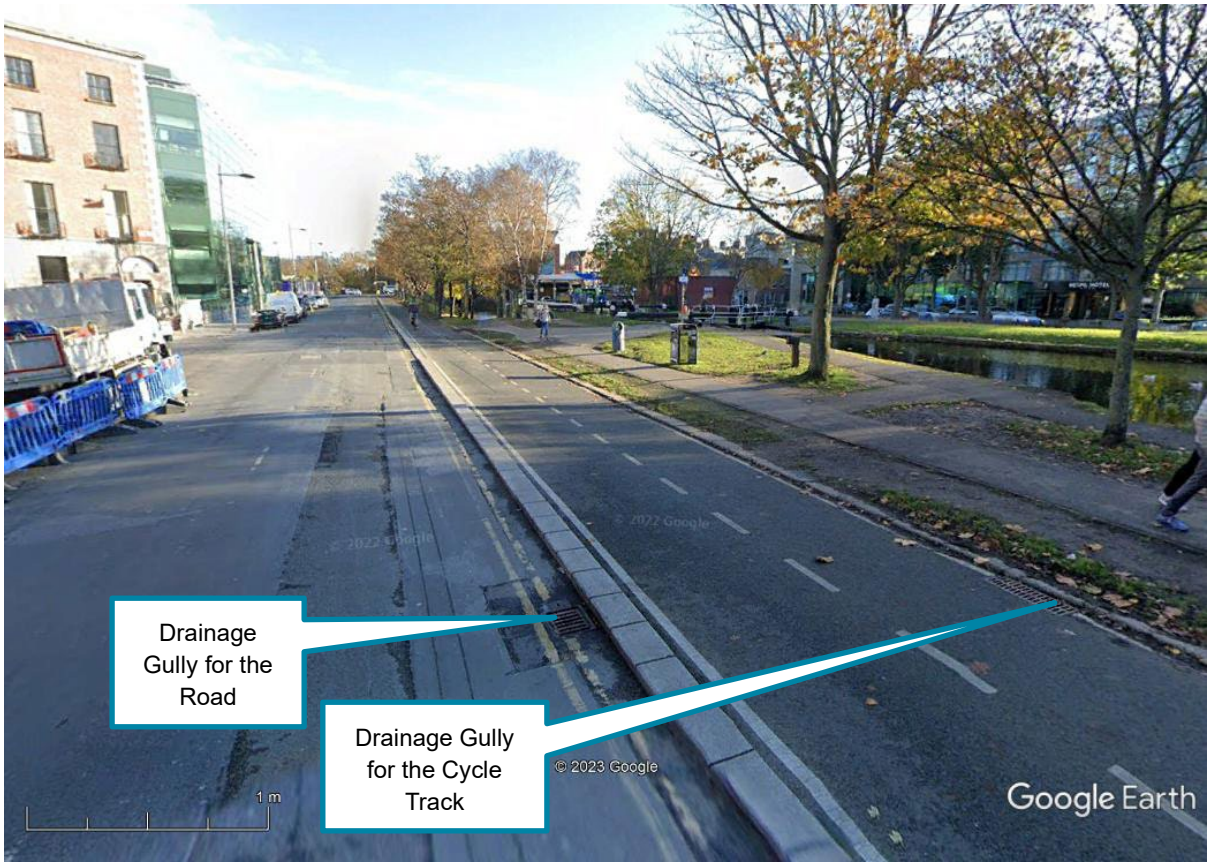


Figure 2-11-50: Example of Cycleway with separate drainage system at Grand Canal, Wilton Place

2.4.7.5 Environmental Protection Division

Response to Section 2.7.5 (pages 32 to 36) including reference to the Appendix:

Drainage System – General Comments

Issues Raised in DCC Submission

The DCC submission on pages 32 to 35 consists mainly of a synopsis of the general requirements of the City Council for appropriate management of the surface water drainage system in the city area. There are a number of location specific comments which are addressed later on in this response document.

Response to Issues Raised in DCC Submission

Response to Section 2.4.7.5 (including reference to the Appendix) of the DCC submission:

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. EIAR Chapter 13, Section 13.4.1.1 outlines the key design principles for the proposed surface water management design for the scheme.

The design of the Proposed Scheme has taken account of the requirement under the EU Water Framework Directive to protect and improve water quality in all waters, including surface waters. This includes recognition that the surface water drainage network impacted by the Proposed Scheme outfalls to a number of protected waterbodies that are identified as Priority Areas for Action under the Water Framework Directive's 2nd and 3rd River Basin Management Plans, and that these contiguous waterbodies, for example the Finglas Stream & River Tolka, 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' (NTA 2020) 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 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' (NTA 2020) which 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 where 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 GI measures have been incorporated.

Drainage System – Specific Comments

Issues Raised in DCC Submission

The DCC submission on page 34 contains a number of location specific comments:

1. *"While an Increase in permeable areas in some sections is welcome, consideration should still be given to SuDS treatment of runoff whenever possible. It would be preferable to see nature based solutions throughout rather than oversized pipes, though we recognise that site constraints might prevent the NTA providing these in some cases. In particular:*

    a. ~~*There is an opportunity for a nature based solutions at junction of Kylemore road and Ballyfermot Road (B2875) which has not been shown In the drawings.*~~

    b. ~~*Has consideration been given to soft landscaping as opposed to Tank / Pond provided as shown on Ballyfermot Road (83200)?*~~

2. *While It is accepted that approximate design attenuation calculations and impermeable area calculations are shown as hatched areas, the exact areas are to be provided in the format set out in the legend, In the drawings provided at detailed design stage.*

3. *The drawings are to be checked throughout the submission to ensure compliance with the Greater Dublin Regional Code of Practice. Currently, manholes are missing throughout the design at the start of piped networks and at multiple Junctions.*

4. *River networks are to be included in the catchment drawings as they are missing and hence the drawings show outfalls going to illogical locations.*

5. *How the swales are to be maintained is difficult to understand with the locations of the manholes connecting multiple swales? This is to be clarified at detailed design stage.*

~~*6. Design check at Ballyfermot Road (B3800-B4200), the attenuation volume provided in the text box (129m') is not consistent with that shown in the leader (117m3), this needs to be clarified.*~~

~~*7. Design check on Sarsfield Road (B4200-B4700) volumes provided to be clarified.*~~

8. Design to be in accordance with Sustainable Drainage Design & Evaluation Guide 2021, for example (A360) the connection of the swales Is to be clarified.

Several of these comments (No's 1, 6 &7 which have been struck-through above) refer to locations on the Liffey Valley to City Centre CBC scheme and were presumably included in error. It is also unclear if the other general comments relate to this scheme.

Response to Issues Raised in DCC Submission

NTA will continue to engage with DCC at the detailed design stage to resolve any technical queries that are relevant.

Flood Prevention

Issues Raised in DCC Submission

The DCC submission on page 35 contains the following request for further information to be provided at a later stage:

> *"At detailed design stage more detail will need to be provided and agreed on:*
>
> - *Cross sections for crossings of the Tolka River and section beside it and the Finglas Stream.*
> - *Detailed section of Royal Canal crossing.*
> - *Plan for dealing with local pluvial flooded areas.*
> - *Climate Change Flood Adaption Plan for river crossings.*
> - *FRA should give more detail on the river and canal crossings."*

Response to Issues Raised in DCC Submission

NTA will engage further with DCC on flood prevention matters. However, it should be noted that the Proposed Scheme will have no direct impact on the waterbodies along the route, such as the River Tolka and Royal Canal as has been demonstrated in the EIAR Chapter 13.

2.4.8 Archaeology Section

Response to Section 2.4.8 (pages 36 to 38) including reference to the Appendix:

DCC Archaeology Section acknowledges it supports the proposed assessment and mitigation measures proposed in the EIAR

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

> *"The NTA will procure the services of a suitably-qualified archaeologist as part of its Employer's Representative team administering and monitoring the works. The appointed contractor will make provision to allow for archaeological monitoring, inspection and excavation works that may arise on the site during the Construction Phase."*

2.4.9 Conservation Section

Response to Section 2.4.9 (pages 38 to 51) including reference to the Appendix:

General Conservation Assessment

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

Bus Shelters at Protected Structures and Conservation Areas

Issues Raised in DCC Submission

The DCC submission (on page 46) lists 7 locations where bus stops with shelters will be located near protected structures:

- St. Canice's Church Finglas (on GA Sheet 27): There is an apartment building between the proposed new bus stop and the church.
- Woodland's Lodge, Finglas, on the eastern side of Finglas Road at Ch.B-1220 on GA Sheet 27. There is an existing bus shelter at this location and the stop will be retained in the same position. The shelter is quite old and will be replaced with a new one.
- Glasnevin Cemetery: two bus stops on the eastern side of Finglas Road at Ch.B-3,160 on GA Sheet 35 and at Ch.B-3,650 on GA Sheet 36. There are existing high-quality and relatively new shelters at these existing bus stops which will be retained in the same locations.

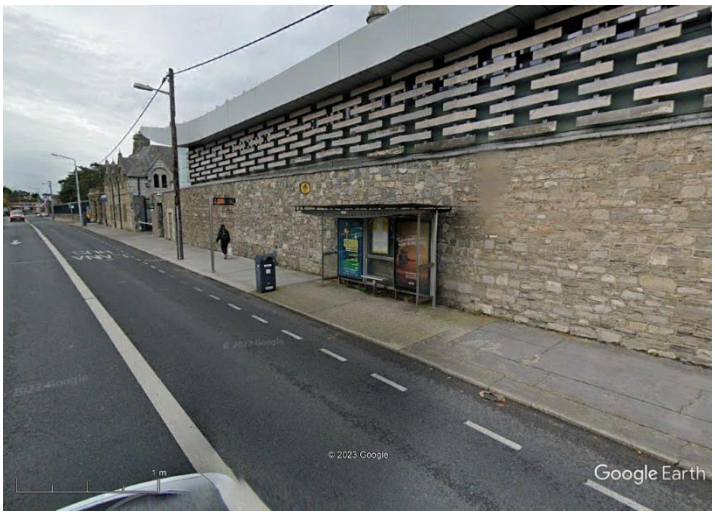


Figure 2-11-51: Existing Bus Stop at Glasnevin Cemetery

- St. Michan's Church, Church Street Lower on the western side at Ch.A-6,670 on GA Sheet 20. There is an existing high-quality and relatively new shelter at this existing bus stops which will be retained in the same location.
- Stone facade of CIE Mechanical Engineering/Roads Department building, Phibsborough Road on the western side at Ch.A-5,570 on GA Sheet 16. There is an existing high-quality and relatively new shelter at this existing bus stops which will be retained in the same location.
- No.22 & 23 Phibsborough Road: there is no existing or proposed bus shelter in front of these buildings.
- Former Player's Factory (and Cahill Print Works), Botanic Road, on the eastern side at Ch.A-4,300 on GA Sheet 13. There is an existing high-quality and relatively new shelter at this existing bus stops which will be retained in the same location.

The DCC submission notes various other historical features along the route that are highlighted for the applicant to be cognisant of in the further design and development of the Proposed Scheme. This includes the former Royal Canal Broadstone Branch and various features in the vicinity of North Circular Road where Blaquiere's once stood beside Phibsborough Library.

The DCC submission notes that the Proposed Scheme will pass through Architectural Conservation Areas and Conservation Areas and ZZ and Z8 lands at 11 locations and it comments on the sensitivity that should be given in the scheme design to the potential visual impact of bus stops and other street furniture in these areas.

Cycle Lanes

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

Responses to Issues Raised in DCC Submission7

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.

In relation to the locations referenced by DCC, all have existing bus stops and shelters beside the buildings, so there will be no change in the Proposed Scheme.

The proposed bus stop shelters, as shown in the *Preliminary Design Guidance Booklet for BusConnects,* are of a high-quality design, constructed largely of glass panels with slimline stainless steel frames. They are discreet and highly transparent so as to have minimal visual impact on their surroundings. This type of bus shelter is widely used across Dublin and was designed for use in visually sensitive locations, including in proximity to protected structures and historic buildings. They are already in place in 6 of the 7 locations listed by DCC in their submission and at the seventh location there is an older type of bus shelter. Thus the concerns of the DCC Conservation Section have already been addressed. In this regard the DCC submission suggests potential negative impacts that will not arise.

Figure 2-11-52: Example of the proposed high-quality bus shelters for BusConnects

NTA acknowledges the various other historical features along the route that will be respected and protected where feasible in the Proposed Scheme. Monitoring during the construction phase will be undertaken to identify any below ground remains that may be uncovered during the works, in which case the mitigation measures proposed in EIAR Chapter 16 will be implemented.

Protected Structures, or Groups of Protected Structures, were identified in the study area, as outlined in Sections 16.3.1.2 and 16.3.1.3 of Chapter 16 of the EIAR and described in Appendix A16.2 Inventory of Architectural Heritage Sites in Volume 4 of this EIAR. Section 16.4.3.1 outlines the Construction

Stage Impacts on these Protected Structures. Section 16.4.4.1 outlines the Operational Stage Impacts on these Protected Structures. Section 16.5.1.1 of the EIAR sets out the proposed mitigation measures during the construction phase.

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

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 16.5.1 as set out below: "Proposed mitigation measures for architectural heritage features are outlined below and detailed in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR. The methodology has been prepared in accordance with the Architectural Heritage Protection: Guidelines for Planning Authorities (DEHLG 2011) and Paving: the conservation of historic ground surfaces (McLoughlin 2017)"

Impacts on Architectural Heritage arising from Proposed Tree Removal

DCC noted a number of locations where the proposed removal of trees will impact on architectural character of historic structures, both protected and unprotected, and streetscapes as follows:

1. Our Lady of Victories Church on Ballymun Road (shown on GA Sheet 6) where 2 of 3 small street trees will be removed, and 7 other trees will remain in the garden area in front of the church. The visual impact for the setting of the 20th Century church will be very slight.

2. On St. Mobhi Road at Whitehall College (Home Farm Football Club pitch) on the eastern side (shown on GA and Landscaping drawings Sheet 10) where a large group of coniferous trees will need to be removed for road widening.

3. On St. Mobhi Road south of Dean Swift Bridge on the western side (shown on GA and Landscaping drawings Sheet 10) where 4 healthy and 1 dead tree will need to be removed for road widening. There are numerous other large trees in the vicinity and the impact for the setting of the bridge will be minimal.

4. On the western side of Constitution Hill opposite the King's Inns (shown on GA and Landscaping drawings Sheets 16 & 17) where most of the existing trees will need to be removed for road widening and realignment of the footpath. These trees will be replaced with new trees such that the visual impact will be mitigated.

5. Opposite Glasnevin Cemetery on the southern side of Finglas Road (shown on GA and Landscaping drawings Sheet 36) the line of existing trees along the street edge will be retained, but a second line of trees in the public park area at Claremont Lawns, located 9m further back from the street trees will need to be removed for the provision of a replacement parking area. These trees will be replaced with new trees such that the visual impact will be mitigated.

Cycle Tracks Surfacing

The DCC Conservation Section request for an alternative high quality cycle lane surface in-lieu of red tarmacadam in certain locations is impractical in a city where this would require a change of the cycle track surfacing at numerous places. It is questionable if worthwhile benefit would derive from such superficial arrangements on the main arterial streets and roads in the Proposed Scheme. To locally modify the cycle track surface would be inconsistent, and it would diminish the effectiveness of distinguishing that part of the road visually to increase awareness of vehicle drivers of the need to safeguard the road space allocated to cyclists for safety reasons.

2.4.10 City Architect's Division

Response to Section 2.4.10 (pages 51 to 58) including reference to the Appendix:

General Assessment

NTA acknowledges that DCC's City Architect's Division welcomes the Proposed Scheme in general and supports the proposed improvements for public transport and active travel. The submission also welcomes the various proposed public realm improvements. It is noted that there have been previous engagements with the BusConnects project office on numerous occasions during the design development for the Proposed Scheme.

Footpath Widths

Issue Raised in DCC Submission

The DCC submission (on page 53) is as follows:

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

Response to Issue Raised in DCC Submission

The Proposed Scheme consists mainly of modifications to the traffic layout along existing streets and roads where the width is generally constrained. The existing footpaths are largely unaffected in the scheme proposals, and it was a key consideration not to reduce the existing footpath widths unless absolutely necessary (on St. Mobhi Road for example) where it was not possible to avoid some degree of impact. These slightly narrower footpaths will nevertheless be adequate for the low numbers of pedestrians at those locations. They are listed in Table 4-2 of the Preliminary Design Report (PDR) included in the Supplementary Information, with deviations from the design standards listed in Appendix C of the PDR.

The existing footpath widths within the proposed scheme are generally satisfactory for the pedestrian traffic, which varies considerably along the various streets and roads. Along much of the route the footpaths are about 3m wide, and wider in some places, such as in Ballymun town centre where they are 4m wide.

There are some places where the existing footpaths are too narrow, such as along Finglas Road north of Old Finglas Road where cycle tracks were provided thirty years ago that encroach onto or share the footpath fully. Pedestrian numbers are quite low along Finglas Road due to the lack of active frontage, but this traffic has increased with the development of apartment buildings along the road in recent times. The Proposed Scheme will improve these footpaths and widen them to at least 2m by relocating the cycle tracks to the road sides of the verges.

Earlier in this response document it has been noted that the proposed scheme will widen the existing footpaths at certain busy locations, such as on the western side of Westmoreland Bridge (Cross Guns Bridge over the Royal Canal) in Phibsborough, in front of Phibsborough Shopping Centre, and on the eastern side of St. Mobhi Road along the frontage of Na Fianna GAA Club and the Home Farm Football Club pitch where the road will be widened for that purpose (as was raised in the DCC submission).

Island bus stops are proposed at appropriate places along the scheme where it is expected that generous waiting space is desirable to cater for congregations of passengers. An example is at Bus Stop No.37 on Ballymun Road at Dublin City University (DCU) shown in Figure 2-11-53. This stop is currently located beside a boundary wall where the double shelter and a bin occupy most of the footpath and cause a restriction for pedestrians walking by as shown in the following photograph. This bus stop will be moved a short distance southwards to where there is a public open space behind the footpath and an island bus stop will be provided so that the footpath and cycle track can pass behind the waiting area without obstruction. In this regard the proposed scheme addresses the issue highlighted in the DCC submission.

Figure 2-11-53: Bus Stop No.37 on Ballymun Road at DCU – to be moved south and upgraded with an island (Google Earth)

Public Realm Improvements

Issue Raised in DCC Submission

The DCC submission (on page 53) lists 10 locations where the proposed scheme will provide public realm improvements but says that there is insufficient information provided.

Response to Issue Raised in DCC Submission

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 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. This consists of replacing footway surfaces appropriate to the location, native planting, new street trees, areas of wildflower grass verges and replacement hedgerows.

As set out in Chapter 4 (Proposed Scheme Description) of Volume 2 of the EIAR, the landscape and urban realm proposals are derived from analysis of the existing urban realm which allowed the designers to consider appropriate enhancement opportunities along the route. The enhancement opportunities include key nodal locations which focus on locally upgrading the quality of the paving materials, extending planting, decluttering of streetscape and general placemaking along the route. Along the route there will be a number of enhancements to specific urban realm hot spots where there is a clear opportunity to improve existing key public spaces. These include for example improvements in Ballymun town centre, at Glasnevin Village, at Hart's Corner to Cross Guns Bridge over the Royal Canal, throughout the full length through Phibsborough Village, and at local focal points such as at the junction of St. Mobhi Road with Botanic Road, and at the Clearwater Shopping Centre on Finglas Road, as illustrated on the Landscape General Arrangement Drawings.

NTA will continue to liaise with DCC in regard to public realm improvements in the detailed design stage.

Prospect Road at Whitworth Road Junction.

Issue Raised in DCC Submission

The DCC submission (on page 54) expresses concerns about the provisions for visually impaired pedestrians in the vicinity of the junction of Prospect Road and Whitworth Road which is a very busy location.

Response to Issue Raised in DCC Submission

The need for more space for pedestrians and cyclists on the eastern side of Prospect Road near the Whitworth Road junction is recognised in the Proposed Scheme, where it is proposed to provide major widening of 6m on the railway bridge (OBO11) and with acquisition of the private landing areas on both sides of the bridge. The existing 2.4m wide footpath will be replaced by a new 3m wide footpath behind the proposed two-way cycle track. This will retain continuity of the footpath along the eastern edge of Prospect Road with a minor improvement in width, as much as can be accommodated in front of the adjoining buildings. There is an existing special tactile paving strip along the back of the existing footpath than extends from the junction at Lindsay Grove around the corner onto Whitworth Road. This can be replaced in the realigned footpath, for which further consultation will be undertaken with the NCBI and DCC to confirm the appropriate details.

North Circular Road Underpass at Phibsborough Library

Issue Raised in DCC Submission

The DCC submission (on pages 54 & 55) discusses the arrangement of the Proposed Scheme at the crossing of North Circular Road in relation to access to Phibsborough Library through the small garden at the front and the changes that will arise in the general vicinity.

Response to Issue Raised in DCC Submission

The garden area in front of the library is shown in the following photograph. There 3 existing pedestrian access routes:

a) On the western side there is a gate that links to the path with steps leading down from North Circular Road.

b) A central path with steps through the garden area.

c) On the eastern side there is a gate that leads to the public road on Royal Canal Bank / Eglington Terrace. This is the access route without steps.

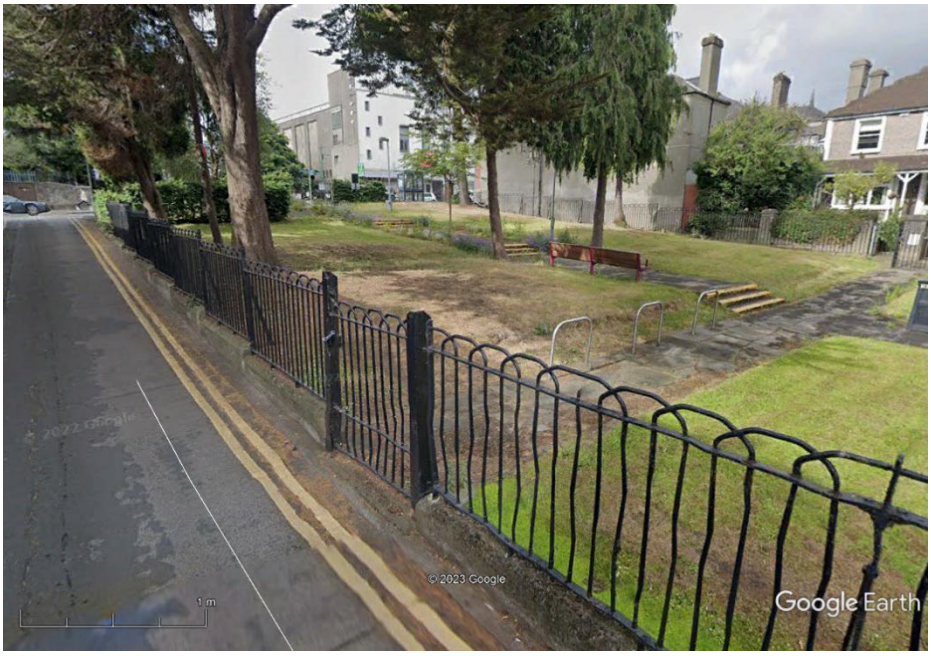


Figure 2-11-54: Existing Access at Phibsborough Library

In the Proposed Scheme the central path link from North Circular Road will be removed but the other two access routes will remain unchanged. The railings at the library will be partially removed to facilitate unimpeded access along the route to the underpass. If there is a proposal to extend the library building to the front, there is space available between the existing building and the proposed route to the

underpass. The design team has provided technical assistance to the architects appointed by DCC to develop concepts for redevelopment of the library. The Proposed Scheme will bring more pedestrians and cyclists past the library along the proposed new link under North Circular Road which will further animate the area and enhance its importance as a public space.

NTA will liaise further with DCC in relation to the details of the proposed remodelled park areas and where practicable and appropriate suitable historical materials can be reused.

Street Trees on Constitution Hill

Issue Raised in DCC Submission

The DCC submission (on pages 55 & 56) questions the proposal to remove existing lime trees along the street in front of the flats on Constitution Hill and to provide replacement silver birch trees.

Response to Issue Raised in DCC Submission

Currently there is no southbound bus lane and only a short length of northbound bus lane on Constitution Hill. The width of the road carriageway is irregular in front of the King's Inns where the boundary is not parallel to the one on the other side of the street. On the western side of the street there is a wide grass verge behind the footpath with a row of lime trees in front of the flats.

In the Proposed Scheme the road will be widened a little on the western side at the southern end of this section to make space for continuous bus lanes, and the western footpath will be realigned closer to the flats. This will encroach on the roots of some of the existing trees, which will need to be replaced. It is proposed to provide 9 replacement lime trees at the northern end where there will be enough green area between the footpath and the boundary of the flats behind. However, along the southern part of this section of street the new trees will need to fit in a narrow verge between widened road and the proposed cycle track where silver birch trees will be more suitable and appropriate. Thus there will be a line of 16 limes trees in the northern section (7 existing retained, and 9 new replacements), and a line of 16 silver birch trees at the southern section of Constitution Hill on the western side.

Impacted trees have been presented in EIAR Volume 3, Part 5, Landscaping General Arrangement drawings, and further described in Volume 4 Appendices Part 2 of 2, Appendix A17.1, Arboricultural Impact Assessment. The Proposed Scheme has been specifically designed to retain mature trees where practicable as addressed in Section 17.4.4.1.4 of the EIAR, Volume 2 Chapter 17, Landscape (Townscape) & Visual Impact Assessment.

Land Acquisition

Issue Raised in DCC Submission

The DCC submission (on page 56) is as follows:

> ***"Land Acquisition by NTA & Taking In Charge:***
>
> *Where it is proposed to CPO or acquire lands as part of the Proposed Scheme, confirmation is sought as to whether ownership of these lands will be transferred to the relevant local authority or will these lands be retained by the NTA but taken in charge by the relevant local authority for maintenance purposes."*

Response to Issue Raised in DCC Submission

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. Consequently all CPO lands acquired by NTA for purposes of the Proposed Scheme will be transferred to the relevant local authority.

Bus Stop Shelters

Issue Raised in DCC Submission

The DCC submission (on page 56) is as follows:

> *"Bus shelters impact on the width of footpaths and should only be proposed where there Is sufficient space to physically accommodate them and passengers congregating in their vicinity. Bus shelter locations are Indicated on the drawings but information on their proposed design, size and type is not provided.*
>
> *The proposed location of new bus shelters in the vicinity of buildings of architectural Importance, in Conservation Areas (for example at St Michan's Church - Sheet 18), In Architectural Conservation Areas (ACA's), and Special Planning Control Schemes (SPCS) needs to be considered carefully considered.*
>
> *In the Interest of visual amenity and having regard to protected structures and their settings, advertisements should preferably not be permitted on bus shelters In Architectural Conservation Areas (ACA) or Special Planning Control Schemes (SPCS)."*

Response to Issue Raised in DCC Submission

This issue was also raised in the submission by the Conservation Section and has been responded to earlier in relation to the high-quality design of the bus stop shelters, which are widely used across Dublin, and are already in place beside protected structures and in conservation areas along the Proposed Scheme, so there will effectively be no change from the existing situations.

Siting of Utility Cabinets and Above-Ground Utility Infrastructure

Issue Raised in DCC Submission

The DCC submission (on page 56) notes 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.

Response to Issue Raised in DCC Submission

BusConnects will require minimal new utility cabinets unlike for example a LUAS light-rail tram line which involves overhead power lines and completely separate signalling and control system. Most of the utility requirements in the Proposed Scheme occur at traffic signal junctions where there are existing cabinets for traffic signal controllers, and for CCTV monitoring. Minor adaptation will be required of these cabinets and equipment in terms of their external appearance and positioning.

The NTA shares the concerns of DCC to minimise visual clutter along the core bus corridors. 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 positioned in appropriate locations, and rationalised where practicable. Usually above ground cabinets are placed beside boundaries at the back of footpaths to be out of the way and visually discreet.

Palette of Materials

Issue Raised in DCC Submission

The DCC submission (on page 57) notes 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.

Response to Issue Raised in DCC Submission

The Landscape General Arrangement drawings do not specifically identify historic granite paving and historic granite kerbs. These materials are generally present only in a few places along the proposed scheme, at Doyle's Corner in Phibsborough, and towards the city centre on Constitution Hill and Church Street. The landscape drawings show the relevant footpaths to be retained, which includes the kerbs.

Various key heritage features to be retained are also noted on the General Arrangement Drawings where applicable. An example is the Irish Volunteers statue at North Circular Road and Royal Canal Bank, which is to be relocated. This proposal applies in general to all such features, even if they are not noted on the drawings, which cannot show all such items comprehensively in the interest of clarity.

In regard to Historic Paving, Setts, Kerbing & Associated Features, NTA recognises the importance of protecting historic street surfaces and notes that appropriate mitigation measures have been considered in the Ballymun Finglas to City Centre Core Bus Corridor Scheme. The EIAR, Volume 2 - Main Chapters, Chapter 16 Architectural Heritage Section 16.5.1 is set out below:

> *"Proposed mitigation measures for architectural heritage features are outlined below and detailed in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR. The methodology has been prepared in accordance with the Architectural* Heritage *Protection: Guidelines for Planning Authorities (DEHLG 2011) and Paving: the conservation of historic ground surfaces (McLoughlin 2017)"*

Palette of Street Furniture

Issue Raised in DCC Submission

The DCC submission (on page 57) notes that a full palette of street furniture is required and seeks 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.

Response to Issue Raised in DCC Submission

Section 16.5.1.7 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 will continue the very positive and constructive liaison with DCC City Architects Department throughout the procurement and construction process including in relation to the final detailing of new street furniture.

Greening

Issue Raised in DCC Submission

The DCC submission (on page 57) is as follows:

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

Response to Issue Raised in DCC Submission

The Landscape drawings provide labels for all sets of proposed new trees that specify the species. This was noted by DCC in the earlier comment about the replacement of existing lime trees with proposed silver birch trees on Constitution Hill.

Section 14 of the Preliminary Design Report, Landscape and Urban Realm, included in the Supplementary Information, sets out that the planting strategy has been developed taking cognisance of the Dublin City Development Plan 2016-2022 and the Dublin City Tree Strategy 2016-2020. Both of these documents support the planting of urban trees where practicable and the Dublin City Tree Strategy in particular sets out the wide ranging benefits of urban trees in terms of air quality, storm water

management, shading and cooling, biodiversity support, noise masking and promoting a general sense of wellbeing.

Boundary Treatments

Issue Raised in DCC Submission

The DCC submission (on page 57) notes 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.

Response to Issue Raised in DCC Submission

Section 13.5 of the Preliminary Design Report 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.*
>
> *Existing gates will be reused where practicable however considerations will be required for the use of bifold gates to mitigate impacts on parking in driveways. All gates will be hung such that they will open inwards onto the property."*

Proposed boundary modifications have been assessed as part of the Architectural Heritage assessment outlined in Chapter 16 of the EIAR, with appropriate mitigation measures outlined where necessary.

Per Cent for Art Scheme

Issue Raised in DCC Submission

The DCC submission (on page 57) is as follows:

> *"It is not clear where the Percent for Art Strategy is to be Incorporated into this project."*

Response to Issue Raised in DCC Submission

NTA will continue the very positive and constructive liaison with DCC City Architects Department throughout the procurement and construction process including consideration of the provision of potential items of public art where appropriate.

Water Drinking Fountains

Issue Raised in DCC Submission

The DCC submission (on page 57) describes a recently adopted new policy to provide public drinking water fountains across the city, which could potentially be included in the Proposed Scheme.

Response to Issue Raised in DCC Submission

The NTA can liaise further with DCC on this matter to explore the possibility of inclusion of public drinking water fountains in the Proposed Scheme where appropriate.

Side Road Entry Treatment

Issue Raised in DCC Submission

The DCC submission (on page 57) is as follows:

> *"Raised tables are indicated in the General Arrangement drawings to most side streets/ roads but not to others. It Is unclear why they have been omitted in these instances."*

Response to Issue Raised in DCC Submission

There are 78 raised table side road entry treatments shown in the Proposed Scheme, and the intention in the design is to provide these tables at all junctions that are not signal-controlled. A few very minor

side streets are not shown on the General Arrangement drawings, but it is intended that they would be treated in the same way as all other side roads. An example is Hammond Lane on Sheet 18.

These platforms are not required at private entrances which will have footpath crossings as indicated in the *Preliminary Design Guidance Booklet for BusConnects.*

Integration of the materials palette of the proposed scheme with existing private landing areas and recently upgraded areas of the public footpath

Issue Raised in DCC Submission

The DCC submission (on page 58) requests a strategy for the resurfacing of private landings (with the owner's consent}, and the retention / replacement of newly resurfaced areas of public footpath should be devised so a consistent paving palette is used throughout the Scheme.

Response to Issue Raised in DCC Submission

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.

With regard to recently delivered public realm areas, there are none along the Proposed Scheme, other than possibly Ballymun Main Street which was reconstructed 20 years ago.

Village Signage

Issue Raised in DCC Submission

The DCC submission (on page 58) is as follows:

> *"Existing 'Welcome to Phibsborough Village' signage provide local wayfinding landmarks and should be retained as part of the Proposed Scheme."*

Response to Issue Raised in DCC Submission

It is the intention of the Proposed Scheme to retain all such existing signage, and possibly to introduce new similar signs in appropriate places such as Ballymun, Glasnevin and Finglas.

Liaison with DCC City Architect's Department

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 continue the very positive and constructive liaison with DCC throughout the procurement and construction process.

2.4.11 Housing and Community Services Departments

Response to Section 2.4.11 (pages 58 to 59) including reference to the Appendix:

Housing Scheme at Constitution Hill

Issue Raised in DCC Submission

The DCC submission (on page 58) describes the proposal by DCC to redevelop and expand the existing social housing at Constitution Hill flats which is not compatible with the proposal in the BusConnects scheme to locate a small temporary construction compound B3 on a yard area at the southern end of flats complex beside Catherine Lane North.

Response to Issue Raised in DCC Submission

Construction Compound B3 is proposed to be located in the yard area at the southern end of the Constitution Hill flats which is little used at present. NTA will continue the very positive and constructive liaison with DCC City Housing and Community Services Department throughout the procurement and construction process including coordination between the Proposed Scheme and the social housing scheme.

2.4.12 Parks Department

Response to Section 2.4.12 (pages 59 to 61) including reference to the Appendix:

Clarity for Footpath widths and Street Furniture

Issue Raised in DCC Submission

The DCC submission says that there is insufficient information provided on the Proposed Scheme drawings to enable the proposals to be clearly understood, and provides one example as follows:

> *"There Is a real shortage of detail on the plans Including a lack of clarity where footways and kerbs are reduced, no street lighting or signage Is shown on the GA or Landscape Plans, therefore there is no knowledge of service runs, utility cabinets or other street fixings which would impact on pedestrian comfort, safety and ability to Install green infrastructure.*
>
> *"It is difficult to verify but it appears that the footways in some locations have been reduced in width, without the street furniture and utilities Indicated it Is unclear if there are impacts to pedestrian safety and comfort, in particular at Glasnevin Cemetery."*

Response to Issue Raised in DCC Submission

Separate and detailed sets of drawings are included in Volume 3 of the EIAR for the Proposed Scheme as follows:

- Part 8: Traffic Signs and Road Markings.
- Part 9: Street Lighting.

All of the information mentioned by the Parks Department is available for the Proposed Scheme. To combined all of that information on the General Arrangement Drawings would be impractical and the drawings would not be properly legible.

The Proposed Scheme consists mainly of modifications to the traffic layout along existing streets and roads where the width is generally constrained. The existing footpaths are largely unaffected in the scheme proposals, and it was a key consideration not to reduce the existing footpath widths unless absolutely necessary (on St. Mobhi Road for example) where it was not possible to avoid some degree of impact. These slightly narrower footpaths will nevertheless be adequate for the low numbers of pedestrians at those locations. The details of the existing and proposed footpath widths are tabulated in the Preliminary Design Report (Supplementary Information lodged with the scheme application) in Table 4-2 on pages 35 to 44.

At Glasnevin Cemetery the footpath on the northern side of the road beside the cemetery boundary wall will be narrowed from 2.8m to 2.0m to accommodate a segregated cycle track. This footpath is very lightly used and does not require more than 2m width. On the southern side of the road at Claremont Lawns the existing footpath is 2m wide and this will be realigned at the same width around the rear of the proposed replacement parking area.

Side Streets along Church Street Lower

Issue Raised in DCC Submission

The DCC submission queries the proposals for provision of raised tables at two side streets, Church Terrace and Church Avenue which are closed to traffic by bollards at the junctions with Church Street Lower. It also mentions Stirrup Lane and New Street North which are closed to traffic at the mid-points.

Response to Issue Raised in DCC Submission

The proposed raised platform entry treatments will provide a continuous footpath across the entries to Church Terrace and Church Avenue, and they will form courtesy crossings, as described in the *Design* Manual *for Urban Roads and Streets (DMURS)* across the other two side streets.

General Comments on Landscaping and Tree Planting

Issue Raised in DCC Submission

The DCC submission lists a variety of issues to be taken into consideration for the planting of new trees along the Proposed Scheme.

Response to Issue Raised in DCC Submission

An arboricultural survey has been undertaken for the Proposed Scheme to identify the condition of potentially impacted trees. This survey is included in Appendix 17.1 of Volume 4 of the EIAR.

The Landscape Proposals for the Scheme including the maturity of the new trees are outlined in on the Landscape Drawings in EIAR Volume 3 Part 5. These landscape proposals include the number of new trees, hedge planting and planting species. The maintenance period is addressed in the Construction Environmental Management Plan in Appendix 5.1 Volume 4 of the EIAR and Chapter 5 of Volume 2 of EIAR.

NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Parks, Biodiversity and Landscape Division comments as these matters were the subject of extensive liaison throughout the design development process. NTA will however continue the very positive and constructive liaison with DCC throughout the procurement and construction process.

Trees on St. Mobhi Road

Issue Raised in DCC Submission

The DCC submission questions the likely survival of the existing mature trees on St. Mobhi Road due to disturbance of the roots during footpath construction works.

It also notes a lack of information about replacement tree planting in the grounds of Na Fianna GAA Club.

Response to Issue Raised in DCC Submission

On St. Mobhi Road the existing concrete footpath is relatively new and is 2.8m wide. At some time in recent years this footpath was reconstructed without damage to the trees, which are 80 years old at this stage. In the Proposed Scheme the existing concrete footpaths will be saw cut to allow removal of the outer 1m width and the remaining 1.8m width along the boundary will be retained. Once the 10cm deep concrete slab is removed the existing granular sub-base will be exposed and reused without disturbance as the foundation for the cycle track. As the proposed cycle track will be 1.25m wide, this will require a little excavation of the grass verge along a 25cm wide strip at the edge of the existing footpath to a depth of up to 15cm. Hand excavation will be undertaken to minimise risk of damage to any shallow tree roots, which will be suitably protected. The new cycle track will require a narrow strip of gravel sub-base along the outer edge, and then new tar macadam will be provided for the cycle track surface. These techniques have been used successfully elsewhere across Dublin in the past where cycle tracks and footpaths have been constructed sensitively beside existing trees.

At Na Fianna, and at Home Farm Football Club, the existing large conifer trees along the boundary will be removed to enable widening of the footpath and cycle track along the eastern side of the public road. Replacement planting of new trees is proposed, subject to agreement with the property owners as this planting will be located on the retained private lands. It is not therefore appropriate to show such details in the Proposed Scheme drawings prior to the necessary agreement of the landowner. It is expected that the replacement trees will be deciduous and more compatible than the existing trees beside the mature plane trees along the street. There is a 15m wide strip between the existing boundary and GAA pitch at Na Fianna, which provides enough room for new planting along the boundary after the road is widened by a little over 2m.

2.5 Overall Conclusion by Dublin City Council

In Section 2.6 on page 62 of the submission Dublin City Council is supportive of the Proposed Scheme and states the following:

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

Appendix 1 - Recommended Conditions

DCC has set out a number of suggested conditions that An Bord Pleanála should attach to a planning consent. NTA provides responses to each of the proposed conditions.

> ***"Proposed Condition 1:***
>
> *That a comprehensive agreement is put in place between DCC and the NTA regarding how the corridor is to be handed over to the NTA and its contractors, what pre-inspection and recording of the corridor is necessary and how the corridor is to be maintained during construction activities and by whom. The agreement shall also address the hand-back 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:***
>
> *Following hand-back, a separate agreement shall be put in place between DCC and the NTA regarding the costs of maintenance of the corridor as a high quality public transport corridor with agreed levels of performance and how the performance of the public transport corridor is not eroded in the future."*

This proposed condition seeks the enactment of an agreement between DCC and the NTA, subsequent to the completion of the construction of the Proposed Scheme, addressing issues related to maintenance costs.

The Proposed Scheme upon its completion reverts to the status of a public road under the management of the relevant local authority, in this case Dublin City Council. The funding of costs associated with the maintenance of public roads can involve a number of parties depending on the status of the road – for instance, in the case of a national road Transport Infrastructure Ireland would have an involvement. As the Proposed Scheme does not encompass any section of national road, its components constitute regional and/or local roads only. Funding of regional and local roads fall under the ambit of the relevant local authority and the Department of Transport.

The Exchequer does not currently provide the NTA with funds for dispersal to local authorities for maintenance activities and the NTA does not have a role in overseeing or organising general public road maintenance activities. However, the NTA does retain responsibility for bus fleet, bus stops and bus shelters, and maintenance of these elements falls within its remit.

The NTA agrees with the objective stated in the draft condition, namely, to ensure "maintenance of the corridor as a high quality public transport corridor with agreed levels of performance". To achieve that

objective, the NTA anticipates continuing its collaboration with DCC to ensure the delivery of an appropriate maintenance regime. As part of this collaboration, the NTA will support the provision of the necessary funding by the relevant parties to ensure that the benefits of the Proposed Scheme are not inappropriately eroded. These are matters that can be successfully addressed between DCC and the NTA, in the absence of any approval condition.

> ***"Proposed Condition 3:***
>
> *All relevant DCC departments involved with the development of the Scheme shall be consulted during the detailed design development process for the Scheme and the NTA shall seek, to the extent practicable, to incorporate the requirements of the DCC departments into the final detailed design of the Scheme."*

The NTA acknowledges the close liaison with DCC that has been in place during the planning and design stage of the Proposed Scheme, which included extensive dialogue with the relevant sections within the Council. The 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.

Planning Department Conditions

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

Response: This matter is already included in the Landscape Proposals for the Proposed Scheme.

Environment and Transport Department Recommendations/Conditions

Traffic Division

1. *"All the traffic management equipment that is necessary for the safe and efficient operation of this Public Transport corridor, including all traffic signal equipment, shall be to the relevant Dublin City council specification and only the relevant Dublin City Council maintenance contractor shall be permitted to undertake electrical or system control work on either the existing or new traffic signals."*

Response: The Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Traffic Division comments provided in the Appendix regarding consideration of the traffic management equipment that is necessary for the safe and efficient operation of this Public Transport corridor, and including all traffic signal equipment, and the relevant DCC specification. NTA is aware of, and acknowledges, the important role of the relevant DCC maintenance contractor, and their continued role on both the existing and new traffic signals. These matters were the subject of extensive liaison throughout the design development process.

Roads Division

The proposed conditions extend over Pages 63 to 66 of the DCC Submission and covers numerous items including existing conditions records, design, reinstatement, construction period and miscellaneous matters.

Response: In regard to the Recommendations/Conditions the NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Roads 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

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

Archaeology Department

The NTA notes the recommendation set out in the Appendix by the Archaeology Department and has set out in the EIAR the intention to appoint a Project Archaeologist.

Conservation Department

In regard to the recommended measures relating to Conservation Issues in the Appendix, the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Conservation Department comments and recommendations as these matters were the subject of extensive liaison throughout the design development process. These issues are addressed within the planning application documents as follows:

The proposed approach to safeguarding architectural interest of affected Architectural Heritage across the Proposed Scheme is covered in Section 16.5 in Chapter 16 in Volume 2 of the EIAR.

The proposed engagement of an architectural heritage specialist is addressed in Section 16.5 in Chapter 16 in Volume 2 of the EIAR.

Best conservation practice, specifications, and method statements for the careful and sensitive relocation and reinstatement of historic fabric is addressed in Section 16.5 in Chapter 16 in Volume 2 of the EIAR.

- The proposed engagement of an architectural heritage specialist and the duties is addressed in Section 16.5 in Chapter 16 in Volume 2 of the EIAR.
- The NTA will continue to engage with the relevant local authority departments in accordance with the relevant guidelines, policy and legislation outlined in 16.2.4 Chapter 16 in Volume 2 of the EIAR.
- Best conservation practice and the Architectural Heritage Protection Guidelines for Planning Authorities (2011) and the Advice Series issued by the Department of Housing, Local Government and Heritage are referenced in 16.2.4 Chapter 16 in Volume 2 of the EIAR.
- The proposed protection measures for all existing original architectural heritage features in the vicinity of the works are outlined in Section 16.5 Chapter 16 in Volume 2 of the EIAR.
- The requirement of the appointed contractor relating to the Architectural Heritage is outlined Section 16.5 Chapter 16 in Volume 2 of the EIAR.

City Architects Department

The NTA notes the general comments on the Proposed Scheme in the recommendations in the Appendix. NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC City Architects Department comments as these matters were the subject of extensive liaison throughout the design development process.

Parks, Biodiversity and Landscape Division

The NTA notes the general comments on the Proposed Scheme in the recommendations in the Appendix. NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Parks, Biodiversity and Landscape Division comments as these matters were the subject of extensive liaison throughout the design development process.

3. Response to Individual Submissions on the Proposed Scheme

3.1 Ref. No.1 – Aidan Power, 30 Cremore Crescent

3.1.1 Submission Location – Glasnevin

The submission raised the following issues:

1. Diversion of traffic from the bus gate at St. Mobhi Road.
2. One-way southbound traffic restriction on Ballymun Road south.

3.1.2 Response to submission

Detailed responses to points 1 to 2 of this submission are provided in Section 2.2.3 and 2.2.4 of this report.

3.2 Ref. No.2 – Ann Moynihan

3.2.1 Submission Location – 167 St. Mobhi Road

The submission raised the following issues:

1. Proposed cycle track.
2. Bus shelter.

3.2.2 Response to submission

Responses to the issues raised are provided in Section 2.2.18 of this report.

3.3 Ref. No.3 – Anna Bourke, 167 St. Mobhi Road

3.3.1 Submission Location – St. Mobhi Road

The submission is from an occupant of No.167 St. Mobhi Road which is included in the CPO.

3.3.2 Response to submission

Detailed responses to this submission are provided in Section 3.2 of this report.

3.4 Ref. No.4 – Annette Murphy, 86 Old Finglas Road

3.4.1 Submission Location – Glasnevin

The submission raised the following issues:

1. Diversion of traffic from the bus gate at St. Mobhi Road.
2. One-way southbound traffic restriction on Ballymun Road south.

3.4.2 Response to submission

Detailed responses to points 1 to 2 of this submission are provided in Section 2.2.3 and 2.2.4 of this report.

3.5 Ref. No.5 – Annemarie & Ciaran Rogers, 2 Ballymun Road

3.5.1 Submission Location – Glasnevin

The submission raised the following issues:

1. Parking for residents on Ballymun Road
2. Details of the road layout on Ballymun Road
3. Access for emergency services

3.5.2 Response to submission

A general response to this issue is in Section 2.2.4 of this report.

1. The Proposed Scheme will not change the existing uncontrolled parking arrangements on Ballymun Road south between Church Avenue and Charlemont Avenue. It is proposed to restrict the road to northbound traffic so as to avoid an increase in two-way traffic on the narrow street.
2. The proposed works on this part of Ballymun Road will be very limited and will simply consist of raised kerbs to segregate the northbound cycle track from traffic. At the junction of Church Avenue a traffic island will be provided to close off the western side of the road to northbound through traffic. The existing footpaths and street trees will not be disturbed in the Proposed Scheme.
3. Emergency services are not restricted by one-way traffic systems, and they may drive northbound on this section of road if they consider it necessary to do so for access.

3.6 Ref. No.6 – Ballygall Road East Residents (Caitriona O'Brien)

3.6.1 Submission Location – Glasnevin

The submission raised the following issues:

1. Diversion of traffic from the bus gate at St. Mobhi Road.
2. One-way southbound traffic restriction on Ballymun Road south.
3. Communications.
4. Bus route to the city centre

3.6.2 Response to submission

Detailed responses to points 1 to 2 of this submission are provided in Section 2.2.3 and 2.2.4 of this report.

A detailed response to point 3 is provided in Section 2.6.3 of this report.

A detailed response to point 4 is provided in Section 2.6.2 of this report.

3.7 Ref. No.7 – Beyond the Junction

3.7.1 Submission Location – Phibsborough

The submission raised the following issues:

1. Air Quality
2. Traffic and facilities for Buses and Cyclists
3. Biodiversity and Climate Change

3.7.2 Response to submission

Detailed responses to these points are provided in Section 2.3.3.1 of this report.

3.8 Ref. No.8 – Bill Reddington, 6 Cremore Road

3.8.1 Submission Location – Glasnevin

The submission raised the issue of the diversion of traffic from the bus gate at St. Mobhi Road.

3.8.2 Response to submission

A detailed response to this submission is provided in Section 2.2.3 of this report.

3.9 Ref. No.9 – Brendan Heneghan

3.9.1 Submission Location – Various

The submission raised the following issues:

1. Bus journey time savings.
2. Bus lanes and cycling facilities at Church Street.
3. Bus Gate on St. Mobhi Road.
4. Interactions with Blanchardstown CBC.
5. Consultation process.

3.9.2 Response to submission

Item 1 is responded to in Section 2.6.4 of this report.

Item 2 is responded to in Section 2.4.2 of this report.

Item 3 is responded to in Section 2.2.3 of this report.

Item 4: The interactions between the Proposed Scheme and the Blanchardstown CBC are addressed in Chapter 21 of the EIAR.

Item 5 is responded to in Section 2.6.3 of this report.

3.10 Ref. No.10 – Cabra Park Residents Association (Samir Eldin)

3.10.1 Submission Location – Phibsborough

This submission is made on behalf of the Cabra Park Residents Association.

The submission raised the following issues:

1. The Proposed Scheme is generally welcomed, especially the proposed urban realm improvements at Cross Guns Bridge and the underpass at North Circular Road.
2. Concern about linkage from the western side of Phibsborough to the Royal Canal Bank cycle route, including from Cross Guns Bridge to Leinster Street North.
3. Desire for more biodiversity with suggestions for additional planting on Phibsborough Road from Cross Guns Bridge to Leinster Street, and at the junction of Church Street and Chancery Street.

4. Request for higher quality paving on from both sides of Phibsborough Road from Connaught Street to Leinster Street.

5. It is noted that some cyclists will wish to use the bus lanes through Phibsborough and that appropriate signs should make clear that this is legitimate.

6. Accessible ramp is required between North Circular Road and Royal Canal Bank park.

7. Enforcement of bus lanes is required.

3.10.2 Response to submission

2. Linkage for cyclists from the western side of Phibsborough to the Royal Canal Bank cycle route: A detailed response to this submission is provided in Section 2.3.3.1 of this report.

3. The potential for more biodiversity has been carefully considered in the Proposed Scheme with planting proposed at various suitable locations along the core bus corridor as shown in the Landscaping General Arrangement Drawings in EIAR Volume 3, Part 5. This includes a new planted median island with additional trees in the centre of Phibsborough Road between the Royal Canal and Munster Street as shown on Sheet 13 of the drawings in Figure 3-7. In busy pedestrian areas it is not practical to provide much planting where space is limited and damage by trampling is likely, which is why there is not more planting included in the Proposed Scheme.

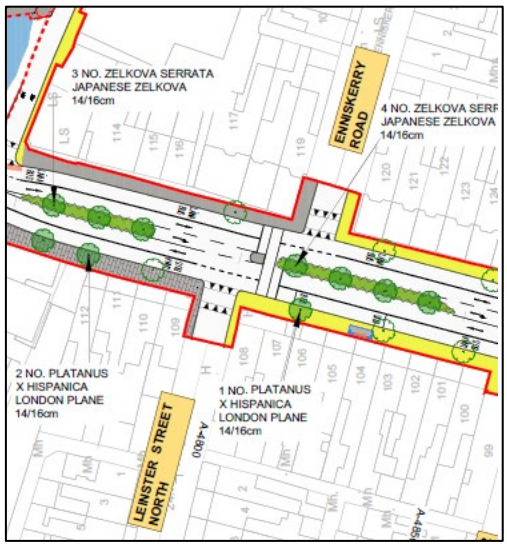


Figure 3-7: Proposed Scheme Landscape Plan Sheet 13 at Phibsborough Road

4. Paving: The landscape design strategy had a tiered approach to the use of materials as explained in EIAR Chapter 4, Section 4.6.12, which focussed the highest-quality materials in the main commercial and civic centres. Phibsborough Road changes character from commercial village centre to residential neighbourhood north of Connaught Street and this is reflected in the proposed paving materials. While it might seem desirable to extend the high-quality paving along the 150m gap between Connaught Street and Leinster Street North, this would dilute the visual impact and meaning of the overall landscape design strategy that is focussed on the key urban nodes.

5. The standard regulatory sign (F360) for a bus lane includes a cycle symbol to reflect that the bus lane is for the use of cyclists as well.

6. An accessible ramp is included in the Proposed Scheme between North Circular Road and Royal Canal Bank park.

7. Enforcement of bus lanes: A response is provided in Section 2.2.6.16 of this report.

3.11 Ref. No.11 – Carmel Sherry, 18 Mannix Road

3.11.1 Submission Location – Glasnevin

The submission raised the following issues:

1. Diversion of traffic from the bus gate at St. Mobhi Road.
2. Need for traffic lights at the junction of Botanic Avenue and Botanic Road.
3. Segregation between pedestrians and cyclists.
4. Cycle Lane beside the Botanic Gardens.
5. Navigation clearance under the proposed footbridge over the Royal Canal.

3.11.2 Response to submission

Item 1 is responded to in Section 2.2.3 of this report.

Item 2 is responded to in Section 2.2.6.13 of this report.

Item 3 is responded to in Section 2.2.5 of this report.

Item 4: There is an existing northbound advisory cycle lane on Botanic Road beside the Botanic Gardens. This road is too narrow for a segregated cycle track, so instead cyclists can follow the proposed cycle track on St. Mobhi Road and then along the Tolka Valley Cycleway beside St. Mobhi Drive which links to Glasnevin Hill and Ballymun Road where the existing cycle lanes will be upgraded to segregated cycle tracks.

Item 5: The proposed footbridge over the Royal Canal will cross over the water channel at a high level with vertical clearance for boats to pass underneath.

3.12 Ref. No.12 – Carola Reynolds, 10 St. Mobhi Road

3.12.1 Submission Location – Glasnevin

The submission raised issue of the proposed bus stop in front to this house.

3.12.2 Response to submission

A detailed response to this submission is provided in Section 2.1.3.5 of this report.

3.13 Ref. No.13 – Ciaran & Laura Byrne, 100 St. Mobhi Road

3.13.1 Submission Location – Glasnevin

The submission raised the following issues:

1. Southbound bus lane at southern end of St. Mobhi Road.
2. Cycle tracks beside the footpaths at southern end of St. Mobhi Road.
3. Restriction of right-turn eastbound on Botanic Avenue onto St. Mobhi Road southbound.
4. Risk to trees on St. Mobhi Road

3.13.2 Response to submission

Item 1 is responded to in Section 2.2.6.2 of this report.

Items 2 and 4 are responded to in Section 2.2.5 of this report.

Item 3: It is not proposed to restrict the right-turn eastbound on Botanic Avenue onto St. Mobhi Road southbound. This submission refers to a sign for a proposed northbound right-turn restriction from St. Mobhi Road into Botanic Avenue eastbound towards Drumcondra, which will avoid delay for northbound buses. There are alternative routes for local traffic instead.

3.14 Ref. No.14 – Collette D'Arcy, Residents of Tolka Estate

3.14.1 Submission Location – Glasnevin

This submission is on behalf of a large group of residents of Tolka Estate.
The submission raised the issue of the diversion of traffic from the bus gate at St. Mobhi Road.

3.14.2 Response to submission

A detailed response to this submission is provided in Section 2.2.3 of this report.

3.15 Ref. No.15 – Córas Impair Éireann

3.15.1 Submission Location – Broadstone

The objection to the CPO raises the following issues:

a) Biodiversity garden

3.15.2 Response to submission

CIE proposes that the recently developed biodiversity garden, which is a local community project, and the existing advertising hoarding can be incorporated into the Proposed Scheme design. NTA welcomes the recent initiative of the biodiversity garden on what was previously a neglected plot of wasteland that detracted from the urban realm of the area. This is complementary to the other public realm improvements nearby including Broadstone Gate at the new access route to the Grangegorman university campus. Figure 3-8 shows an extract from Landscape General Arrangement Map Sheet 16 with the planting and urban realm proposals at the pocket garden. NTA will collaborate with CIE and the local community group to further develop a design for the Broadstone Pocket Garden that is sensitive to the biodiversity planting, as well as providing improved public access and maintenance.

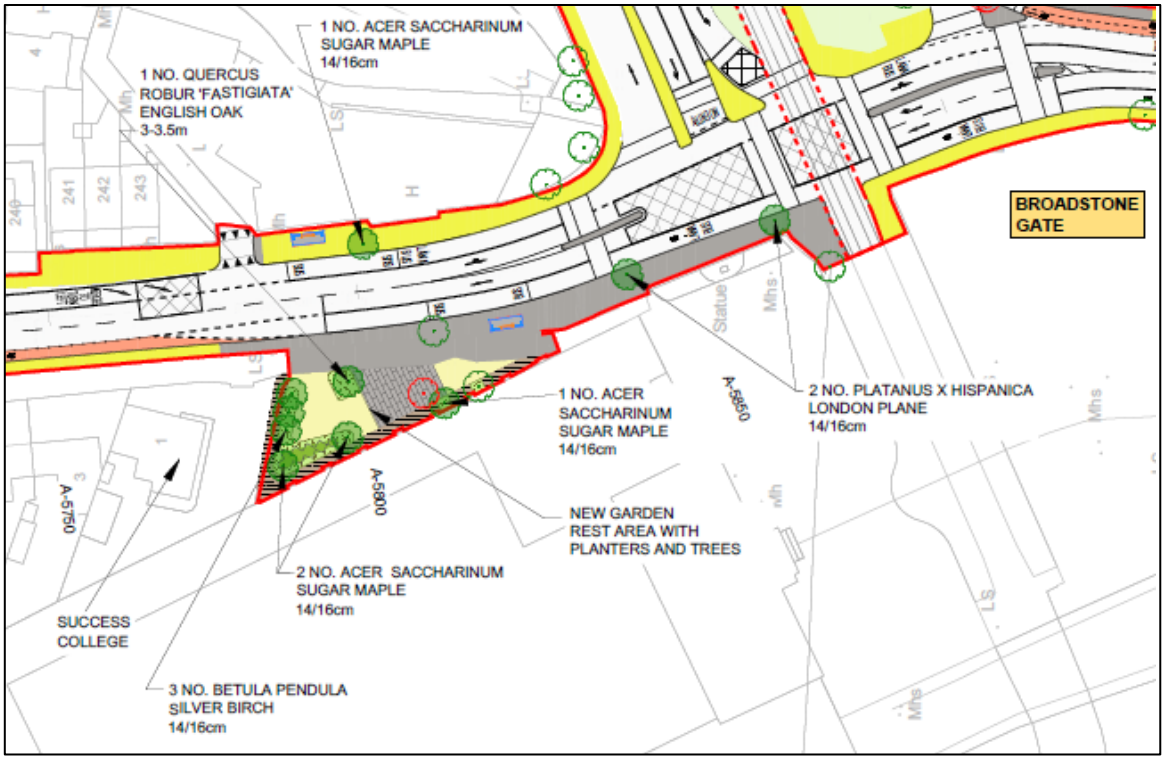


Figure 3-8: Extract from Landscape General Arrangement Map Sheet 16

3.16 Ref. No.16 – Residents of St. Canice's Road (David & Annette Ryan)

3.16.1 Submission Location – Glasnevin

This submission was made by the residents of 21 houses on St. Canice's Road and raised the following issues:

1. Communications.
2. Diversion of traffic from the bus gate at St. Mobhi Road.
3. One-way southbound traffic restriction on Ballymun Road south.
4. Prevention of right-turn from St. Canice's Road to Ballymun Road.
5. Queries about the proposed changes to the traffic system at the junction of Griffith Avenue:
   a) Is southbound traffic on St. Mobhi Road allowed to turn right onto Griffith Avenue. If so, how is that to be accomplished?
   b) Eastbound traffic on Griffith Avenue and southbound traffic on Ballymun Road will be competing for very limited space in the traffic lane at the southern end of the junction to continue their journey on Griffith Avenue.
   c) How will the right hand turn at the northern end of the junction for traffic wanting to travel eastwards on Griffith Avenue be managed?
   d) How will city bound traffic travelling east on Griffith Avenue access St. Mobhi Road? If traffic turns north onto Ballymun Road, we feel that this could become a chokepoint and block the one general lane of northbound traffic.
6. Bus route to the city centre

3.16.2 Response to submission

A detailed response to point 1 is provided in Section 2.6.3 of this report.

A detailed response to point 2 is provided in Section 2.2.3 of this report.

A detailed response to point 3 is provided in Section 2.2.4 of this report.

A detailed response to point 4 is provided in Section 2.1.3.7 of this report.

A detailed response to point 5 is provided in Section 2.2.6.17 of this report.

A detailed response to point 6 is provided in Section 2.6.2 of this report.

3.17 Ref. No.17 – David Kerins & Nicola Callaghan, 34 St. Mobhi Road

3.17.1 Submission Location – Glasnevin

The submission raised the following issues:

1. Bus stop and shelter
2. Cycle tracks beside the footpaths on St. Mobhi Road.
3. Risk to trees on St. Mobhi Road

3.17.2 Response to submission

Item 1 is responded to in Section 2.2.6.11 of this report.

Items 2 and 3 are responded to in Section 2.2.5 of this report.

3.18 Ref. No.18 – Declan & Audrey Dempsey, 5 Cremore Crescent

3.18.1 Submission Location – Glasnevin

The submission raised the following issues:

1. Proposed modifications at the Griffith Avenue junction are welcomed.
2. Proposed bus gate at St. Mobhi Road is welcomed.
3. One-way southbound traffic restriction on Ballymun Road south.
4. Diversion of traffic from the bus gate at St. Mobhi Road.

3.18.2 Response to submission

A detailed response to point 3 is provided in Section 2.2.4 of this report.

A detailed response to point 4 is provided in Section 2.2.3 of this report.

3.19 Ref. No.19 – Deirdre Dalton, 97 Tolka Estate & Patrick, Rita and Louise Hanlon, 104 Tolka Estate

3.19.1 Submission Location – Glasnevin

The submission raised the following issue:

1. Diversion of traffic from the bus gate at St. Mobhi Road.

3.19.2 Response to submission

A detailed response this issue is provided in Section 2.2.3 of this report.

3.20 Ref. No.20 – Department of Housing Development Applications Unit (DAU)

3.20.1 Submission Location – Various

The submission from DAU addresses two issues:

- Archaeology
- Nature Conservation – at the Royal Canal.

3.20.2 Response to submission

Detailed responses to this submission are provided in Section 2.7 of this report.

3.21 Ref. No.21 – Dublin City Council

3.21.1 Submission Location – Various

The submission raised a large number of issues:

3.21.2 Response to submission

Detailed responses to this submission are provided in Section 2.11 of this report.

3.22 Ref. No.22 – Dublin Commuter Coalition

3.22.1 Submission Location – Various

The submission raised a large number of issues:

3.22.2 Response to submission

Detailed responses to this submission are provided in Section 2.9 of this report.

3.23 Ref. No.23 – Dublin Cycling Campaign

3.23.1 Submission Location – Various

The submission raised a large number of issues:

3.23.2 Response to submission

Detailed responses to this submission are provided in Section 2.10 of this report.

3.24 Ref. No.24 – Glasilawn Area / Tolka Estate Active Group

3.24.1 Submission Location – Glasnevin

The submission raised the following issues:

1. Diversion of traffic from the bus gate at St. Mobhi Road.
2. One-way southbound traffic restriction on Ballymun Road south.
3. Communications.
4. Bus route to the city centre

3.24.2 Response to submission

Detailed responses to points 1 to 2 of this submission are provided in Section 2.2.3 and 2.2.4 of this report.

A detailed response to point 3 is provided in Section 2.6.3 of this report.

A detailed response to point 4 is provided in Section 2.6.2 of this report.

3.25 Ref. No.25 – Glasilawn Avenue Residents Association – Michelle Flaherty

3.25.1 Submission Location – Glasnevin

The submission raised the following issues:

1. Diversion of traffic from the bus gate at St. Mobhi Road.
2. One-way southbound traffic restriction on Ballymun Road south.
3. Communications.
4. Bus route to the city centre

3.25.2 Response to submission

Detailed responses to points 1 to 2 of this submission are provided in Section 2.2.3 and 2.2.4 of this report.

A detailed response to point 3 is provided in Section 2.6.3 of this report.

A detailed response to point 4 is provided in Section 2.6.2 of this report.

3.26 Ref. No.26 – Glasilawn Environmental Group

3.26.1 Submission Location – Glasnevin

The submission raised the following issues:

1. Diversion of traffic from the bus gate at St. Mobhi Road.
2. One-way southbound traffic restriction on Ballymun Road south.
3. Communications.
4. Bus route to the city centre

3.26.2 Response to submission

Detailed responses to points 1 to 2 of this submission are provided in Section 2.2.3 and 2.2.4 of this report.

A detailed response to point 3 is provided in Section 2.6.3 of this report.

A detailed response to point 4 is provided in Section 2.6.2 of this report.

3.27 Ref. No.27 – Glasilawn Residents Group

3.27.1 Submission Location – Glasnevin

The submission raised the following issues:

1. Diversion of traffic from the bus gate at St. Mobhi Road.
2. One-way southbound traffic restriction on Ballymun Road south.
3. Communications.
4. Bus route to the city centre

3.27.2 Response to submission

Detailed responses to points 1 to 2 of this submission are provided in Section 2.2.3 and 2.2.4 of this report.

A detailed response to point 3 is provided in Section 2.6.3 of this report.

A detailed response to point 4 is provided in Section 2.6.2 of this report.

3.28 Ref. No.28 – Glasilawn Road Residents Association – Deirdre O'Neill

3.28.1 Submission Location – Glasnevin

The submission raised the following issues:

1. Diversion of traffic from the bus gate at St. Mobhi Road.
2. One-way southbound traffic restriction on Ballymun Road south.
3. Communications.
4. Bus route to the city centre

3.28.2 Response to submission

Detailed responses to points 1 to 2 of this submission are provided in Section 2.2.3 and 2.2.4 of this report.

A detailed response to point 3 is provided in Section 2.6.3 of this report.

A detailed response to point 4 is provided in Section 2.6.2 of this report.

3.29 Ref. No.29 – Glasnevin Village Residents Association – David Meagher

3.29.1 Submission Location – Glasnevin

The submission raised the following issues:

1. Ensure enforcement of bus lanes.
2. Measures to address illegal parking especially outside the Botanic Gardens.
3. Traffic calming measures along Glasnevin Hill.
4. Retain all existing pedestrian crossings including at 85 St. Mobhi Road.
5. Safety of locating two bus stops on opposite sides of St. Mobhi Road.
6. Revisit the Bus Gate operation times to reduce impacts when the effect is clear.

3.29.2 Response to submission

Detailed responses to this submission are provided in Section 2.2.6.16 of this report.

3.30 Ref. No.30 – Griffith Avenue & District Residents Association (GADRA)

3.30.1 Submission Location – Glasnevin

The submission raised numerous issues.

3.30.2 Response to submission

Detailed responses to this submission are provided in Section 2.2.6.17 of this report.

3.31 Ref. No.31 – Inland Fisheries Ireland

3.31.1 Submission Location – River Tolka & Royal Canal

The submission raised the issue of protection of waterbodies.

3.31.2 Response to submission

Detailed responses to this submission are provided in Section 2.8 of this report.

3.32 Ref. No.32 – Iona and District Residents Association, Rory Flynn

3.32.1 Submission Location – Drumcondra

The submission raised various issues about through traffic in this residential area.

3.32.2 Response to submission

Detailed responses to this submission are provided in Section 2.2.6.4 of this report.

3.33 Ref. No.33 – Jean Keogh, 69 Ballymun Road

The submission raised the following issues:

1. Communications.

3.33.1 Response to submission

A detailed response is provided in Section 2.6.3 of this report.

3.34 Ref. No.34 – John Deegan & Nóirín Finnegan, 32 St. Mobhi Road, and Brian McCormack, 45 St. Mobhi Road

3.34.1 Submission Location – Glasnevin

The submission raised the following issues:

1. Narrowing of the footpath for a cycle track on St. Mobhi Road.
2. Impact for trees in general and in particular the one at this house.
3. Bus stop.

3.34.2 Response to submission

Detailed responses for Items 1 and 2 of this submission in general are provided in Section 2.2.5 of this report.

In relation to the specific issue raised about the tree in front of this house, additional information is as follows: EIAR Volume 4, Appendix A17.1 is an Arboricultural Impact Assessment Report which provides a baseline for the existing condition of all trees along the route. Tree No.03T142 is located in front of No.30/32 St. Mobhi Road and is shown in Figure 3-4. The commentary by the arborist as to the condition of this tree is as follows:

> *"Deadwood throughout into upper canopy. In a state of decline".*

The recommendation of the arborist is to fell this tree and to replace it. It is not necessary to remove this tree to accommodate the Proposed Scheme. However, it is appropriate that a new healthy replacement tree be provided for continuity of the urban landscape along St. Mobhi Road for the long term. There will also be a public safety issue whenever the decline of this tree makes it unstable and at risk of collapse into the public road or footpath.

Figure 3-4: Existing tree in front of No.32 St. Mobhi Road

A detailed response for Item 3 of this submission is provided in Section 2.2.6.11 of this report.

3.35 Ref. No.35 – John Keoghan, 26 Clareville Grove

3.35.1 Submission Location – Finglas Road, Glasnevin

This submission objects to the loss of some public open green space to provide replacement parking on Finglas Road opposite Glasnevin Cemetery.

3.35.2 Response to submission

A detailed response to this submission is provided in Section 2.5.2.3 of this report.

3.36 Ref. No.36 – John Lillis, 7 Glasilawn Avenue

3.36.1 Submission Location – Glasnevin

The submission raised the following issues:

1. Diversion of traffic from the bus gate at St. Mobhi Road.
2. One-way southbound traffic restriction on Ballymun Road south.
3. Communications.
4. Bus route to the city centre

3.36.2 Response to submission

Detailed responses to points 1 to 2 of this submission are provided in Section 2.2.3 and 2.2.4 of this report.

A detailed response to point 3 is provided in Section 2.6.3 of this report.

A detailed response to point 4 is provided in Section 2.6.2 of this report.

3.37 Ref. No.37 – Katherine Kelliher

3.37.1 Submission Location – Glasnevin

The submission raised the following issues:

1. Removal of trees at Na Fianna for a wider cycle track and footpath on St. Mobhi Road.
2. Pedestrian crossing at the Botanic Gardens.
3. Bus shelter near the junction of Botanic Road and Botanic Avenue

3.37.2 Response to submission

Item 1: A detailed response for this item in this submission is provided in Section 2.2.5 of this report.

Items 2 & 3: A detailed response for these items in this submission is provided in Section 2.2.6.5 of this report.

3.38 Ref. No.38 – Kathleen Cuffe, 90 St. Mobhi Road

3.38.1 Submission Location – Glasnevin

The submission raised the following issues:

1. Signal controlled priority instead of a southbound bus lane on St. Mobhi Road.
2. Right-turn from Prospect Road to Finglas Road.
3. Metrolink will mean no need for Bus Connects.

3.38.2 Response to submission

Item 1: A detailed response for this item in this submission is provided in Section 2.2.6.2 of this report.

Item 2: A detailed response for this item in this submission is provided in Section 2.2.6.6 of this report.

Item 3: A detailed response for this item in this submission is provided in Section 2.2.6.17 of this report.

3.39 Ref. No.39 – Kevin & Helen Summons-Walsh, 94 Old Finglas Road

3.39.1 Submission Location – Glasnevin

The submission raised the following issues:

1. Diversion of traffic from the bus gate at St. Mobhi Road.
2. One-way southbound traffic restriction on Ballymun Road south.

3.39.2 Response to submission

Detailed responses to points 1 to 2 of this submission are provided in Section 2.2.3 and 2.2.4 of this report.

3.40 Ref. No.40 – Kevina McGill, 50 Dean Swift Road, Wadelai

3.40.1 Submission Location – Glasnevin

The submission raised the following issues:

1. Right turn from St. Canice's Road onto Ballymun Road.
2. Diversion of traffic from the bus gate at St. Mobhi Road.
3. One-way southbound traffic restriction on Ballymun Road south.
4. Traffic displacement from Blanchardstown CBC to Ballymun Road.
5. Metrolink impacts during construction at Collins Avenue station.
6. Communications and consultations.

3.40.2 Response to submission

1. A detailed response to point 1 is provided in Section 2.1.3.7 of this report.

2 & 3. Detailed responses to points 2 and 3 of this submission are provided in Section 2.2.3 and 2.2.4 of this report.

4. Chapter 21 of the EIAR provides an assessment of the cumulative and in-combination effects with other projects, which includes the Blanchardstown CBC and potential traffic displacements. That assessment demonstrates that there will be an overall significant reduction in traffic flows on all the main radial roads in Dublin as a result of mode shift form private transport to public transport as the integrated network is developed.

5. Chapter 21 of the EIAR also assesses the likely construction impacts of the Proposed Scheme and Metrolink if constructed concurrently with the BusConnects scheme, and it notes that *"localised Moderate and Temporary / Short-Term cumulative construction effects in the local area are likely to be most notable at the locations of the proposed Metro stations between Glasnevin and Ballymun".*

6. A detailed response to point 6 is provided in Section 2.6.3 of this report.

3.41 Ref. No.41 – Lesley Hewson, Lorraine Rooney & Alfreda Kavanagh, c/o 6 Prospect Square

3.41.1 Submission Location – Glasnevin

The submission raised the following issues:

1. Cycleway at Prospect Way – various concerns.
2. Access at businesses at the corner of St. Mobhi Road and Botanic Road
3. Traffic diverted from bus gate on St. Mobhi Road and delays at the eastbound left turn from Griffith Avenue to Ballymun Road.
4. Bus stop on railway bridge at Prospect Road.
5. Urban realm improvement on Botanic Road - clarification.

3.41.2 Response to submission

1. Detailed responses to this point of the submission are provided in Section 2.2.6.9 of this report.
2. A detailed response to this point of the submission is provided in Section 3.2 of this report.
3.. A detailed response to this point of the submission is provided in Section 2.3.6 of this report.
4. A detailed response to this point of the submission is provided in Section 2.11.4 items (c) and (d) of this report.
5. The urban realm proposals at Botanic Road are described in Section 2.2.3 of this report as follows:

> *"A public realm scheme is proposed in the heart of the village at the junction of Botanic Road / Botanic Avenue / Glasnevin Hill. This will greatly narrow the mouth of the junction to shorten the crossing distance between the church and the shops with a raised platform courtesy crossing."*

Figure 3-5 (Image 4.3 in EIAR Chapter 4) illustrates these proposals and shows the enlarged pedestrian area that will be provided in front of the row of shops.

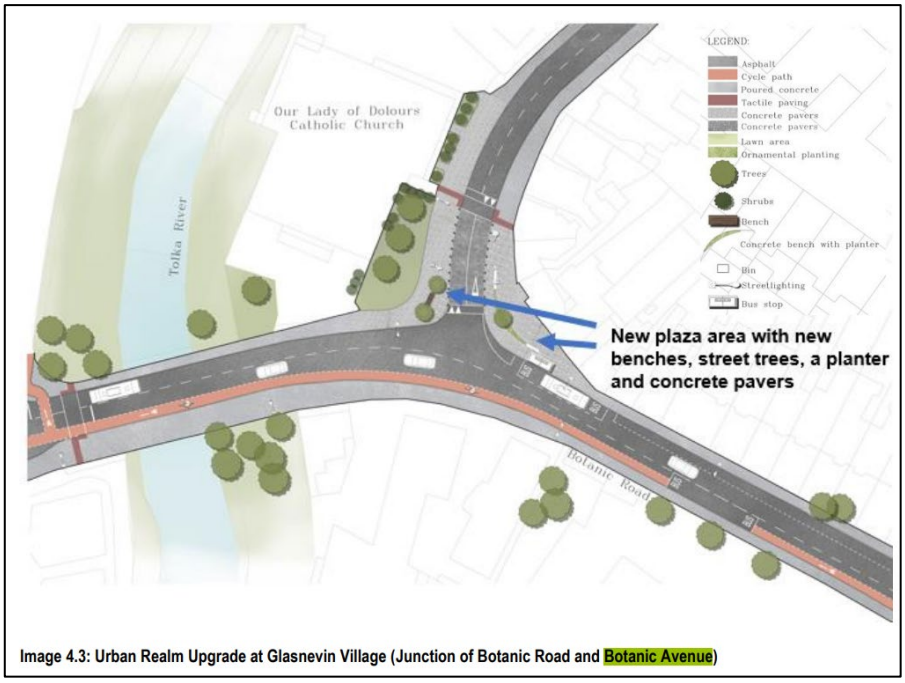


Figure 3-5: Proposed urban realm improvements at the junction of Botanic Road and Botanic Avenue

3.42 Ref. No.42 – Louise Rainford, 24 Cremore Crescent

3.42.1 Submission Location – Glasnevin

This submission is also on behalf of the residents of 4 other houses at 27, 28, 34 & 39 Cremore Crescent.

The submission raised the following issues:

1. Diversion of traffic from the bus gate at St. Mobhi Road.
2. One-way southbound traffic restriction on Ballymun Road south.

3.42.2 Response to submission

Detailed responses to this submission are provided in Section 2.2.3 and 2.2.4 of this report.

3.43 Ref. No.43 – Maeve O'Neill & Colm Foley, 362 Griffith Avenue

3.43.1 Submission Location – Glasnevin

The submission raised the following issues:

1. Diversion of traffic from the bus gate at St. Mobhi Road.
2. One-way southbound traffic restriction on Ballymun Road south.

3.43.2 Response to submission

Detailed responses to this submission are provided in Section 2.2.3 and 2.2.4 of this report.

3.44 Ref. No.44 – Margaret McDonnell & Kieran Smyth, 121 Ballymun Road

3.44.1 Submission Location – Ballymun Road at DCU

This submission is also signed by the following people:

- Patricia Rutledge, 117 Ballymun Road
- John & Chizuru Ryan, 119 Ballymun Road
- Brian Carolan & Eilis Kinnane, 111 Ballymun Road
- Lampros & Natasa Nikolopoulos, 57 Ballymun Road
- Suzanne & Patrick Keenan, 394 Griffith Avenue.

The submission raised the following issues:

1. Bus Stop No.37 at Albert College Lawn.

3.44.2 Response to submission

A detailed response to this submission is provided in Section 2.1.3.3 of this report.

3.45 Ref. No.45 – Senator Marie Sherlock

3.45.1 Submission Location – Various

This submission is also from Councillors Declan Meenagh, Brendan O'Rourke and Christina Casey.

The Proposed Scheme is generally welcomed, especially the cycling facilities, the underpass at North Circular Road and the urban realm improvements.

The submission raised the following issues:

1. BusConnects and Metrolink.
2. Air quality.
3. Traffic diverted by the proposed bus gate at St. Mobhi Road.
4. Width of the two-way cycle track on Prospect Road.
5. Segregation of cyclists along Royal Canal Bank., and other issues for local traffic flows, through traffic, and pedestrian security at the underpass at North Circular Road.
6. Broadstone pocket garden and ecology generally.
7. Loading bay in the area between St. Mobhi Road and Hart's Corner.

3.45.2 Response to submission

1. BusConnects and Metrolink: Response provided in Section 2.2.2.17 of this report.
2. Air quality: Response provided in Section 2.3.3.1 of this report.
3. Traffic diverted by the proposed bus gate at St. Mobhi Road: Response provided in Section 2.2.3 of this report.
4. Width of the two-way cycle track on Prospect Road: The proposed cycle track is 3m wide including a buffer zone of 0.5m on the traffic side, which leaves an effective width of 2.5m, that is a relaxation from the preferred width of 3.25m but is wider than the minimum width of 2.25m required in the National Cycle Manual. (Refer to Preliminary Design Report Appendix C "Deviations from Standards" in the Supplementary information). Prospect Road is constrained in width and a wider cycle track is not feasible without land acquisition from 21 houses with small front gardens. This section of cycle track is only 200m long and cyclist traffic is expected to be quite tidal on the radial route to and from the city centre, which will allow overtaking against the low opposing flow of cyclists. The Proposed Scheme provides a continuous segregated cycle track compared to the original proposal in the Emerging Preferred Route that required northbound cyclists to follow the one-way traffic system and to share a section of bus lane on a particularly narrow section of Finglas Road at Hart's Corner.
5. Royal Canal Bank cycle route. This issue is partly addressed earlier in Section 2.3.3.1. Royal Canal Bank is very lightly trafficked as was observed in numerous site visits by the design team, and previously by the team that prepared the GDA Cycle Network Plan. Traffic counts were not necessary to confirm that the existing streets along Royal Canal Bank are quiet with very low and slow traffic flows, and they are suitable for shared use by cyclists without need for segregation from traffic. This type of shared street is common in northern European cities that are regarded as models for cycling facilities. In the Netherlands they are called "*fietsstraat*" and in Germany "*Radstrasse*", both of which mean "*cycle street*".

   On the northern part of this route at Eglington Terrace at the side of Mountjoy Prison the road is very narrow and restricted to one-way traffic northbound, but the "no-entry" sign at the northern end has a plate that says, "except cyclists". In order to better provide for an increased number of cyclists it is proposed to provide a southbound cycle track beside this one-way section of street for more capacity and comfort, as is shown on General Arrangement Drawings Sheets 13 and 14.

   The issue of through traffic movements across the local streets at Royal Canal Bank is addressed earlier in Section 2.3.3.1 of this report.

   Pedestrian security at the underpass at North Circular Road will be assisted by the proposed 19m wide span of the bridge which is greater than the 16.7m length of the bridge. There will be public lighting at night and the approaches will have good through visibility. Large numbers of

pedestrians and cyclists are expected to use this new route, which will provide passive security for everyone.

6. NTA notes the recent planting at Broadstone pocket garden, and this will be adapted into the proposed further improvement of this small park area in the Proposed Scheme. Opportunities for more biodiversity/ecology generally have been identified and included in the Proposed Scheme wherever practicable.

7. There is no existing loading bay between St. Mobhi Road and Hart's Corner. However, this submission probably refers to the loading bay on Botanic Road at the corner with Botanic Avenue, which will be retained in the proposed scheme. Table 7.2 of Appendix G, Parking Assessment Report, of the Preliminary Design Report (Supplementary Information) is shown below, which confirms this aspect of the Proposed Scheme. The loading bay is not labelled on the General Arrangement Drawing Sheet 22, which shows that it is proposed to move the existing bus stop No.183 a short distance further north as part of the revised junction layout, to where there will be a wider footpath space to provide a bus shelter. The loading bay will shift slightly south as part of this minor rearrangement.

Table 7.2: Existing and Proposed Parking Supply Summary (Section 2.1)

Section	Parking Type	Existing	Proposed	Loss of Parking/Loading
Ballymun Road/Glasnevin Hill	Loading	1	1	0
	Disabled	1	1	0
	Pay & Display (Designated)	14	14	0
	Informal	59	59	0
	New Formalised	0	7	+ 7

3.46 Ref. No.46 – Martina Creaven, 5 Riverbank Hall, Addison Park, Old Finglas Road

3.46.1 Submission Location – Glasnevin

The submission raised the following issues:

1. Diversion of traffic from the bus gate at St. Mobhi Road.
2. No right-turn traffic signal at Addison Park.

3.46.2 Response to submission

1. A detailed response to Item 1 of this submission is provided in Section 2.2.4 of this report.
2. The operation of the traffic signals on Old Finglas Road at the junction with Cremore Villas / Addison Park will be adjusted to reflect changes in traffic flows and will include suitable provision for the eastbound right-turn into Addison Park.

3.47 Ref. No.47 –Mary & Brian Lambert, 8 Ballymun Road

3.47.1 Submission Location – Glasnevin

The submission raised the following issues:

1. Parking on Ballymun Road south, one-way system and trees.

3.47.2 Response to submission

A detailed response to the general issue of the proposal to restrict northbound traffic on the southern section of Ballymun Road is provided in Section 2.2.4 of this report. It is not possible to make an exemption on the one-way restriction for the local residents, who will need to detour around to the west to approach their houses from the north.

The existing trees on this road will not be impacted in the Proposed Scheme.

3.48 Ref. No.48 – Senator Mary Fitzpatrick

3.48.1 Submission Location – Various

The Proposed Scheme is generally welcomed for the improvement of public transport.

The submission raised the following issues:

1. BusConnects and Metrolink interactions including during construction.
2. Cycling facilities in Phibsborough.
3. Replacement of trees.
4. Provisions for loading.
5. Island bus stops.

3.48.2 Response to submission

1. BusConnects and Metrolink: Response provided in Section 2.2.2.17 of this report.
2. Cycling facilities in Phibsborough: Response provided in Section 2.3.3.1 of this report.
3. Removal of trees has been limited to the minimum that is necessary for the Proposed Scheme, especially for mature street trees such as the London Plane trees along St. Mobhi Road. In overall terms there will be a net increase of 236 (21%) trees along the route as detailed in Table 14.1 of the Preliminary Design Report (Supplementary Information).
4. Provisions for loading: In general the existing loading bays are retained on the Proposed Scheme, with possible minor adjustments of the locations, as described in Appendix G, Parking Assessment Report, of the Preliminary Design Report (Supplementary Information). Requests for loading to be permitted from bus lanes where there is no nearby loading bay can be considered by the NTA in conjunction with Dublin City Council as an operational matter on a case-by-case basis.
5. Island bus stops: Detailed responses are provided in Sections 2.2.5 and 2.2.10 of this report.

3.49 Ref. No.49 – Maureen Smyth & Anne Murphy, 11 Cremore Villas

3.49.1 Submission Location – Glasnevin

The submission raised the following issues:

1. Diversion of traffic from the bus gate at St. Mobhi Road.
2. One-way southbound traffic restriction on Ballymun Road south.
3. Segregation between pedestrians and cyclists.

3.49.2 Response to submission

Detailed responses to Items 1 and 2 of this submission are provided in Section 2.2.3 and 2.2.4 of this report.

Item 3 is responded to in Section 2.2.5 of this report.

3.50 Ref. No.50 – Neasa Hourigan TD

3.50.1 Submission Location – General, Phibsborough & Glasnevin

The submission raised the following issues:

1. Accessible bus stops.
2. Cycle tracks at parking bays.
3. Phibsborough
4. Diversion of traffic from the bus gate at St. Mobhi Road.

3.50.2 Response to submission

1. Accessible bus stops: A detailed response to this item is provided in Section 2.2.6.10 of this report.
2. A buffer zone, 0.75m wide, is provided between cycle tracks and parking bays in accordance with the National Cycle Manual.
3. A detailed response to Item 3 is provided in Section 2.3.3.1 of this report.
4. A detailed response to Item 4 is provided in Section 2.2.3 of this report.

3.51 Ref. No.51 – Niamh and Ger Davis, 16 Cremore Crescent

3.51.1 Submission Location – Glasnevin

This submission is also on behalf of the residents of 4 other houses at 22, 26, 28 & 42 Cremore Crescent.

The submission raised the following issues:

1. Diversion of traffic from the bus gate at St. Mobhi Road.
2. One-way southbound traffic restriction on Ballymun Road south.

3.51.2 Response to submission

Detailed responses to this submission are provided in Section 2.2.3 and 2.2.4 of this report.

3.52 Ref. No.52 – Our Lady of Victories Schools

3.52.1 Submission Location – Ballymun Road

This submission is on behalf of the three schools on the one campus on Ballymun Road and it raises several issues about the impact of the Proposed Scheme for access to the schools and various associated concerns about disruption during construction.

3.52.2 Response to submission

Detailed responses to this submission are provided in Section 2.1.3.2 and for the CPO in Section3.6 of this report.

3.53 Ref. No.53 – Pat Rooney, 55 Ballymun Road

3.53.1 Submission Location – Glasnevin

The submission raised the following issues:

1. Information about the Proposed Scheme.
2. New cycle tracks on Griffith Avenue are not used.
3. No need for more southbound bus lanes.
4. Revised traffic circulation routes and difficulties of access.
5. Removal of parking on Ballymun Road at Albert College Park.
6. Removal of trees.
7. More bus routes are required including to Dublin Airport

3.53.2 Response to submission

1. Information about the Proposed Scheme: a detailed response is provided in Section 2.2.6.8 of this report.
2. Cycle tracks on Griffith Avenue: Response in Section 2.1.3.6 of this report.
3. No need for more bus lanes: Detailed response is provided in Section 2.2.6.2 of this report.
4. Revised traffic circulation routes and difficulties of access: a detailed response is provided in Section 2.2.3 of this report.
5. Removal of parking on Ballymun Road at Albert College Park: Response in Section 2.1.3.4 of this report.
6. Removal of trees has been limited to the minimum that is necessary for the Proposed Scheme, especially for mature street trees such as the London Plane trees along St. Mobhi Road. In overall terms there will be a net increase of 236 (21%) trees along the route as detailed in Table 14.1 of the Preliminary Design Report (Supplementary Information).
7. More bus routes: a detailed response is provided in Section 2.4.2 of this report.

3.54 Ref. No.54 – Paul McAuliffe TD

3.54.1 Submission Location – Various

This submission is also on behalf of Councillors Rachel Batten, Keith Connolly and Briege Mac Oscar.

The submission raised the following issues:

1. New footpath link beside No.117 North Road, Finglas.
2. Construction impacts as Casement Park, Finglas.
3. Consultation process.
4. Traffic diverted by the bus gate on St. Mobhi Road.
5. Interaction with Metrolink.
6. Access to parking and driveways at the Griffith Avenue gyratory.

3.54.2 Response to submission

1. New footpath link beside No.117 North Road, Finglas: Response provided in Section 2.5.2.1 of this report.
2. Construction impacts as Casement Park, Finglas: The Proposed Scheme will require Construction Compound F1 to be located in this public park area, and it is likely to be required for the full 2 years duration of the construction period as described in EIAR Chapter 5, Section

5.4. That EIAR chapter gives full details of the activities and potential impacts at the compounds.

3. Consultation process: Response provided in Section 2.6.3 of this report.
4. Traffic diverted by the bus gate on St. Mobhi Road: Response provided in Section 2.2.3 of this report.
5. Interaction with Metrolink: Chapter 21 of the EIAR also assesses the likely construction impacts of the Proposed Scheme and Metrolink if constructed concurrently with the BusConnects scheme, and it notes that *"localised Moderate and Temporary / Short-Term cumulative construction effects in the local area are likely to be most notable at the locations of the proposed Metro stations between Glasnevin and Ballymun"*.
6. Access to parking and driveways at the Griffith Avenue gyratory: Response provided in Section 2.2.6.1 of this report.

3.55 Ref. No.55 – Paul McLoughlin & Emma Costello, 40 Cremore Crescent

3.55.1 Submission Location – Glasnevin

This submission is also on behalf of the residents of No.1, 5 and 7 Cremore Crescent.

The submission raised the following issues:

1. Diversion of traffic from the bus gate at St. Mobhi Road.
2. One-way southbound traffic restriction on Ballymun Road south.

3.55.2 Response to submission

Detailed responses to this submission are provided in Section 2.2.3 and 2.2.4 of this report.

3.56 Ref. No.56 – Peter & Anna Dore, 92 St. Mobhi Road

3.56.1 Submission Location – Glasnevin

The submission raised the following issues:

1. Signal controlled priority instead of a southbound bus lane on St. Mobhi Road.

3.56.2 Response to submission

Item 1: A detailed response for this item in this submission is provided in Section 2.2.6.2 of this report.

3.57 Ref. No.57 – Philip Lynch, 41 Cremore Crescent

3.57.1 Submission Location – Glasnevin

This submission is also on behalf of the residents of No.15, 20 and 35 Cremore Crescent.

The submission raised the following issues:

1. The proposed bus gate on St. Mobhi Road is welcomed as an improvement for bus service reliability.
2. The proposed changes to the Griffith Avenue Gyratory traffic system are welcomed.
3. Diversion of traffic from the bus gate at St. Mobhi Road.
4. One-way southbound traffic restriction on Ballymun Road south.

3.57.2 Response to submission

Detailed responses to Items 3 and 4 of this submission are provided in Section 2.2.3 and 2.2.4 of this report.

3.58 Ref. No.58 – Ray Lynn, 14 Iveragh Road

3.58.1 Submission Location – Glasnevin

The submission raised the following issues:

1. Diversion of traffic from the bus gate at St. Mobhi Road.

3.58.2 Response to submission

A detailed response to this submission is provided in Section 2.2.3 of this report.

3.59 Ref. No.59 – Residents of Tolka Estate (Maria Hynes)

3.59.1 Submission Location – Glasnevin

The submission by Maria Hynes generally welcomes the Proposed Scheme and the option selected for St. Mobhi Road that retains the existing street trees but raised concern about the diversion of traffic from the bus gate at St. Mobhi Road towards their area.

3.59.2 Response to submission

Detailed responses to this submission are provided in Section 2.2.3 and 2.2.4 of this report.

3.60 Ref. No.60 – Richard & Susan Dunne, 25 Glasnevin Hill and Collette Casey, 63 Glasnevin Hill

3.60.1 Submission Location – Glasnevin

The submission raised the following issues:

1. Diversion of traffic from the bus gate at St. Mobhi Road.
2. Parking on Glasnevin Hill
3. Alternative traffic diversion route via Finglas Road

3.60.2 Response to submission

1. A detailed response to Item 1 of this submission is provided in Section 2.2.3 of this report.

2. The General Arrangement Drawing Sheet No.21 shown in Figure 3-6 indicates provision of 9 new on-street parking spaces on the western side of Glasnevin Hill beside No.34 & 38. The existing road is unusually wide at this location at the entrance to the Bon Secours Hospital and the additional parking can be provided by minor adjustments of the road layout without encroachment into the adjoining properties, for which there is a planning permission for development.

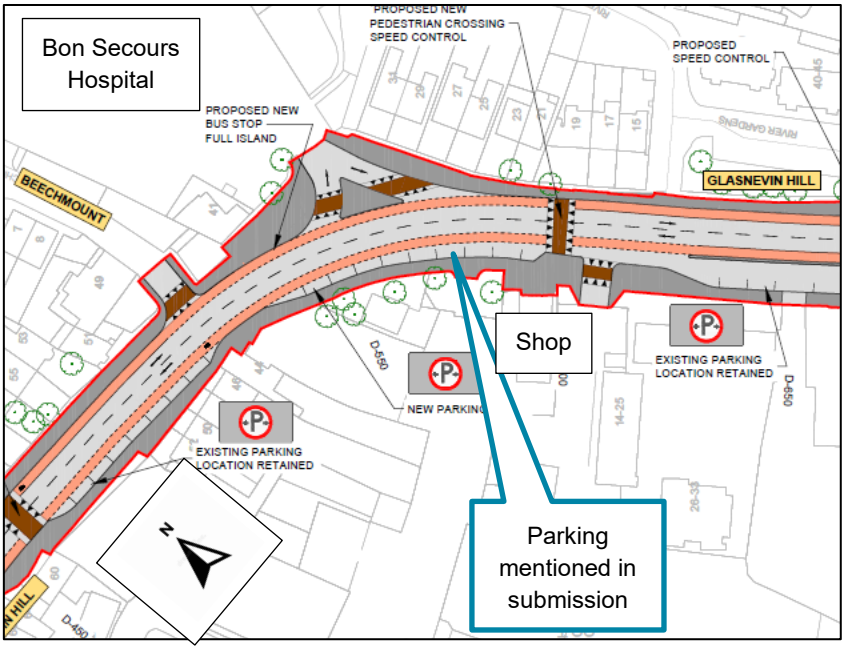


Figure 3-6: Proposed Scheme at Glasnevin Hill

3. The Proposed Scheme includes two alternative traffic routes to be signed to divert northbound traffic away from St. Mobhi Road, with the primary alternative to Finglas Road as has been suggested in this submission. EIAR Chapter 4, Section 4.5.2.1 states the following:

> *"Northbound through-traffic will be diverted at Hart's Corner via R135 Finglas Road instead of R108 Botanic Road. This traffic may then traverse eastward at Old Finglas Road to re-join R108 Ballymun Road at R102 Griffith Avenue."*

3.61 Ref. No.61 – Roisin Shortall TD

3.61.1 Submission Location – Various & Glasnevin

The submission raised the following issues:

1. Support for the Proposed Scheme in principle.
2. Traffic diversions from the bus gate at St. Mobhi Road.
3. Changes to the one-way system at Griffith Avenue will require direction signs, and access must be retained to the properties and parking.
4. Protections for vulnerable pedestrians, including segregation from cyclists, narrow footpaths ,and island bus stops.
5. Parking in Glasnevin.

3.61.2 Response to submission

2. Traffic diversions from the bus gate at St. Mobhi Road: Detailed responses to this submission are provided in Sections 2.2.3 and 2.2.4 of this report.
3. Direction signs will be provided at the modified Griffith Avenue gyratory traffic system to assist drivers to navigate on the correct route towards their destination. Detailed responses to this submission are provided in Section 2.2.10 of this report.
4. Provisions for vulnerable pedestrians: Detailed responses to this submission are provided in Sections 2.2.5 and 2.2.10 of this report.
5. Parking in Glasnevin: Detailed responses to this submission are provided in Section 2.2.10 of this report.

3.62 Ref. No.62 – Sean & Natalie L'Estrange, 16 St. Mobhi Road

3.62.1 Submission Location – Glasnevin

The submission raised the following issues:

1. Cycle tracks beside the footpaths and risk to trees on St. Mobhi Road.
2. Various queries about traffic movements at the Griffith Avenue traffic gyratory.
3. Traffic diversion due to the proposed bus gate at St. Mobhi Road, which will increase the northbound trip distance to this house by 0.5km.

3.62.2 Response to submission

Item 1 is responded to in Section 2.2.5 of this report.

Item 2 is responded to in Section 2.2.6.14 of this report.

Item 3 is responded to in Section 2.2.5 of this report in general terms. Specifically the increased in trip distance to this house from St. Mobhi Drive from 1km to 1.5km will not be significant in the context of longer journeys for which the proportional increase will be modest.

3.63 Ref. No.63 – Sindy & Noel Fitzpatrick, 117 North Road, Finglas

3.63.1 Submission Location – Finglas

The submission raised the following issues:

1. New footpath link beside No.117 North Road, Finglas.

3.63.2 Response to submission

1. Response provided in Section 2.5.2.1 of this report.

3.64 Ref. No.64 – St. Vincent's Basketball Club

3.64.1 Submission Location – Phibsborough / Glasnevin / Finglas

1. The submission welcomes the Proposed Scheme in broad terms for the various proposed improvements for cycling facilities, but they have reservations about the proposals through Phibsborough.
2. They have concerns about the existing cycling facilities at the junctions of Griffith Avenue with Ballymun Road and St. Mobhi Road in terms of confusion for drivers.
3. The existing cycling facilities along Finglas Road need improvement.

3.64.2 Response to submission

1. Cycling facilities in Phibsborough: Response provided in Section 2.3.3.1 of this report.
2. Existing cycling facilities at the junctions of Griffith Avenue with Ballymun Road and St. Mobhi Road will be modified as part of the Proposed Scheme to move off the road surface and onto the grass verges. All junctions on this CBC, and the other CBCs in Dublin will be modified in a similar way so that they will become the standard arrangement with which drivers and cyclists will become familiar with to ensure that cyclists have appropriate protection from traffic. More information is provided in Section 2.9.4 of this report.
3. Improved cycling facilities along Finglas Road are included in the Proposed Scheme.

3.65 Ref. No.65 – Tesco

3.65.1 Submission Location – Northwood / Phibsborough / Finglas

This submission was prepared by RMLA Planning consultants on behalf of Tesco and raised concerns about the proposed scheme for the Tesco sites at the following locations:

1. Northwood Distribution Centre.
2. Phibsborough Shopping Centre.
3. Clearwater Shopping Centre, Finglas.

3.65.2 Response to submission

1. Northwood Distribution Centre: Response in Section 2.1.3.1 of this report.
2. Phibsborough Shopping Centre: Response in separate report for the CPO objections.
3. Clearwater Shopping Centre, Finglas: Response in Section 2.5.2.2 of this report.

3.66 Ref. No.66 – Cremore Residents Association

3.66.1 Submission Location – Glasnevin

The submission raised the following issues:

1. Diversion of traffic from the bus gate at St. Mobhi Road.
2. One-way southbound traffic restriction on Ballymun Road south.
3. Communications.
4. Bus route to the city centre

3.66.2 Response to submission

Detailed responses to points 1 to 2 of this submission are provided in Section 2.2.3 and 2.2.4 of this report.

A detailed response to point 3 is provided in Section 2.6.3 of this report.

A detailed response to point 4 is provided in Section 2.6.2 of this report.

3.67 Ref. No.67 – Residents of Albert College Lawn

3.67.1 Submission Location – Ballymun Road at Albert College Lawn

The submission raised the following issues:

1. Relocation of Bus Stop No.37.
2. Pedestrian access to the bus stop.
3. Impact for large beech tree.
4. Parking by construction workers.

There are also some issues associated with Metrolink which are separate from this Proposed Scheme.

3.67.2 Response to submission

1. Detailed response to point 1 of this submission is provided in Section 2.1.3.3 of this report.
2. Pedestrian access to the bus stop from Albert College Lawn will be the same standard arrangement as for all island bus stops with a pedestrian priority crossing area as provided for

in the standard detail included in the Preliminary Design Guidance Booklet for BusConnects (EIAR Volume 4, Appendix A4.1) with a raised table crossing of the cycle track, and a signal crossing that may be activated on request as shown in Figure 3-1.

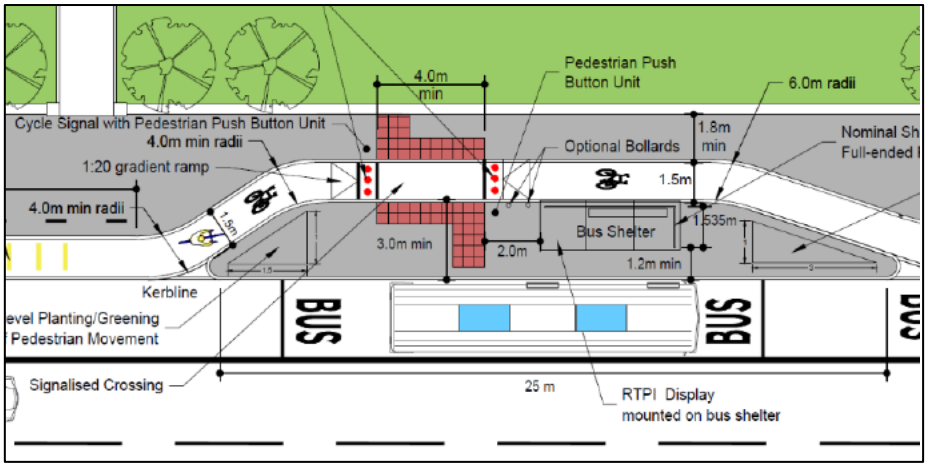


Figure 3-1: Extract from PDGB Figure 34 for Island Bus Stop

3. There is a large beech tree located south of the footpath link between Ballymun Road and Albert College Lawn as shown in Figure 3-2. The proposed island bus is north of the footpath link and there will be no works close to the tree that could cause damage to it.

Figure 3-2: Existing Tree at Albert College Lawn (Google Earth)

4. The works in the Proposed Scheme at this location will be of short duration and possible parking by construction workers in the surrounding area is unlikely to have much impact for the nearby residents.

3.68 Ref. No.68 – Wadelai Hillcrest and District Residents Association

3.68.1 Submission Location – Glasnevin

This submission by Deidre Martin, Kevina McGill and Margaret White raised the following issues:

1. Diversion of traffic from the bus gate at St. Mobhi Road.
2. One-way southbound traffic restriction on Ballymun Road south.

3. Communications.
4. Bus route to the city centre

3.68.2 Response to submission

Detailed responses to points 1 to 2 of this submission are provided in Section 2.2.3 and 2.2.4 of this report.

A detailed response to point 3 is provided in Section 2.6.3 of this report.

A detailed response to point 4 is provided in Section 2.6.2 of this report.