Swords to City Centre Core Bus Corridor Scheme

NTA Observations on the Proposed Scheme CPO Objections

November 2023

BUS CONNECTS

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1. Introduction

1.1 Compulsory Purchase Order

This report provides a response to the objections made to An Bord Pleanála ("the Board") in response to the Swords to City Centre Core Bus Corridor Scheme Compulsory Purchase Order 2023 ("the CPO"), which relates to the Swords to City Centre Core Bus Corridor Scheme ("the Proposed Scheme").

An overview of the objections is provided in Section 1.2 below. The issues raised in the objections to the CPO, together with the relevant responses, are provided in Section 2.

1.2 Overview of Objections Received

29 objections to the CPO were provided to the NTA by the Board. Each objection was individually numbered by the Board and this numbering system has been retained for ease of reference in this report.

Nine of the parties who submitted the objections also made an identical submission in response to the Section 51 Application for the Proposed Scheme.

Table 1.1 below sets out the locations referred by the objections and the key issues raised.

Table 1.1 Summary of Objections in Response to the CPO

Location	No. of CPO Objections	Key Issue Raised
Old Airport Road	4	Access, Access to Business, Boundary Treatment, Compensation, Duration of Works, Impact to Business, Impact to Business (Operation), Planning Context Security, Utilities
Swords Road (Properties 298 and 300)	2	Further Information Requested
Swords Road (Properties 268 and 270)	2	Architectural Heritage, Construction Impacts, Data Breach, Environmental Impact, Impact on Property, Information request (Policy), Property Value,
Swords Road (Properties 254 and 256)	2	Accommodation Works, Compensation, CPO Notification (Ownership), Impact to Business, Loss of Parking, Parking, Property Value, Roadworks
Swords Road (Property 293)	1	Loss of space/property, Utilities
Collinstown Business Park	2	CPO Legislation, Impact to Business, Safety
Collinstown Cross	3	Access to Business, Construction Impacts, Further information requested, Impact to Business (Operation), Utilities
Cloghran	2	Access, Boundary Treatment, Drainage, Environmental Impacts, Footpaths/Cycle Paths, Noise, Other Matters, Proper Planning, Surplus Land Acquisition, Sustainable Development, Traffic Management
Swords Road (Property 255)	1	Climate Breakdown, One Way System, Why Widen, Why Two 'Motorways'
Dispersed locations	10	Access, Egress, Access to Business, Accommodation Works, Boundary Treatment,

Location	No. of CPO Objections	Key Issue Raised
		Carpark Accessibility, Compensation, Construction Impacts, CPO, CPO Legislation, Cycle Track/Footway, Drainage, Duration of Works, Environmental Impact, Further Information requested, Impact on Business, Impact to Business (Operation), Impact to Business (parking), Incorrect Site Boundaries and Extents of proposed Land Acquisition, Noise, Vibration, Parking, Parking (loading), Planning Context, Privacy, Property Value, Safety, Traffic/Safety, Utilities

Table 1.2 below sets out the location referred by each of the objections.

Table 1.2 Location Referred to by each Objection to the CPO (by ABP Reference Number)

CPO Ref No.	Location	CPO Ref No.	Location	CPO Ref No.	Location	CPO Ref No.	Location
1	Old Airport Road	9	Collinstown Cross	17	Kealy's Cloghran	25	Lowlands, Swords Road
2	Old Airport Road	10	Old Airport Road	18	Swords Road (Properties 254 and 256)	26	Coolock Lane
3	Swords Road (Property 293)	11	Dublin Airport	19	Swords Road (Properties 298 and 300)	27	Drumcondra
4	Swords Road (Properties 254 and 256)	12	Old Swiss Cottage Building	20	Old Airport Road	28	Cloghran
5	Collinstown Business Park	13	Collinstown Cross	21	Swords Road (Properties 268 and 270)	29	Swords Road (Property 255)
6	Collinstown Business Park	14	Collinstown Cross	22	Old Airport Road		
7	Swords Road (Properties 268 and 270)	15	Nevinstown	23	Pinnock Hill		
8	Dorset Street Upper	16	Swords Road (Properties 298 and 300)	24	Cloghran		

2. Response to Objections to the Compulsory Purchase Order (CPO)

2.1 Old Airport Road – CPO-01, CPO-02, CPO-20, CPO-22

2.1.1 Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor, it is proposed to provide a two metre wide footpath, two metre wide segregated cycle track, bus lane and general traffic lane in each direction.

The existing road cross section in this location provides a footpath on each side of the road with one general traffic lane, bus lane and advisory cycle lane in each direction.

In order to achieve the required cross section of the Proposed Scheme land acquisition is necessary from private properties along this section of Swords Road.

The land take required is shown in the following:

- relevant extract of the EIAR Volume 3 Chapter 4 Proposed Scheme Description Appendix 03 General Arrangement drawings in Figure 2.1.
- and the existing aerial view in Figure 2.2.

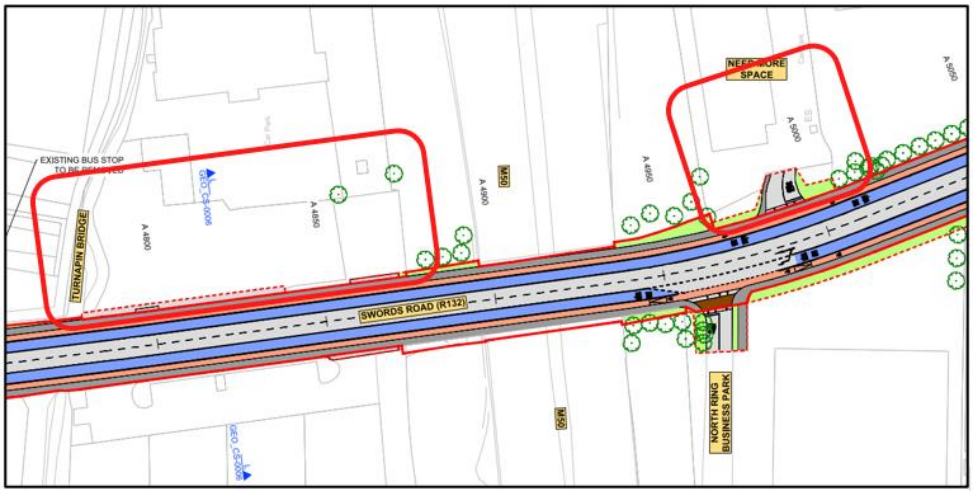

Figure 2.1 Proposed New Layout on Swords Road

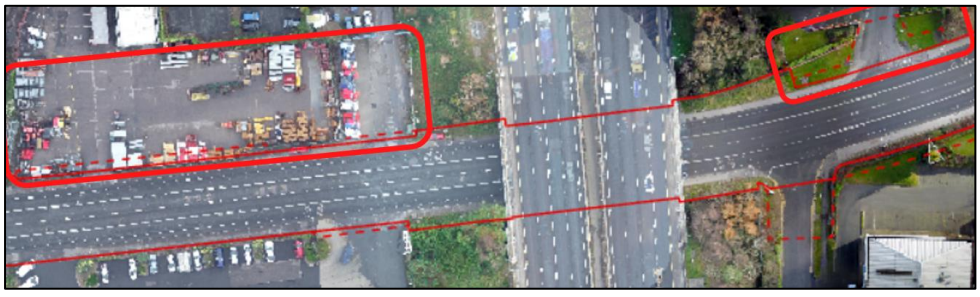

Figure 2.2 Existing Aerial View on Swords Road

Objections CPO-01 and CPO-02 relate to the same plots and are responded to individually below. CPO-20 and CPO-22 which relate to two other separate CPO plots that are adjacent to each other and are responded to individually below.

CPO-01 – Advanced Roofing and Cladding Ltd.

Summary of Objections Raised

The objection to the CPO raises four potential issues:

i) Access

This objection states that 24-hour access is required. The objection further requested that, if planning permission was achieved, that a condition be attached to the CPO that safe vehicular access be maintained during the currency of the works and after the works have been completed.

ii) Security

The objection requested that a condition be attached to the CPO that the security of the business park is maintained both during the works and after the works have completed.

iii) Utilities – ESB Substation

The objection raised concerns regarding a perceived lack of clarity of what will become of the ESB Substation in the course of the CPO. The objection then requested that the Board expressly state that no development in relation to the substation may be carried out under the existing CPO.

iv) Duration of Works

The objection was concerned about length and duration of works and expressly reserves entitlement to claim compensation for loss, disturbance and disruption should the CPO be approved.

Response to Objection Raised

i) Access

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 Section 5.5.3.2 of Chapter 5 of Volume 2 of the EIAR, '*details regarding temporary access provisions will be discussed with residents and business owners prior to construction starting in the area. The duration of the works will vary from property to property, but access and egress will be maintained at all times'*.

Detailed accommodation works plans will be prepared in consultation with landowners in line with any formal agreements and in accordance with any embedded mitigations identified in the EIAR or conditions/modifications from An Bord Pleanála in relation to the Proposed Scheme application.

ii) Security

Section 17.5.1 of Chapter 17 Landscape (Townscape) & Visual of Volume 2 of the EIAR states '*where properties are subject to permanent and/or temporary acquisition appropriate measures will be put in place by the appointed contractor to provide for protection of features, trees and vegetation to be retained, and for continued access during construction and for adequate security and screening of construction works. All temporary acquisition areas will be fully decommissioned and reinstated at the end of the Construction Phase or at the earliest time after the reinstatement works are completed to the satisfaction of the NTA*'.

Reinstatement of property frontage including boundary walls, gates, railings, driveway, footpath and landscaping will be on a like for like basis and detailed accommodation works plans will be prepared in consultation with landowners in line with any formal agreements and in accordance with any embedded mitigations identified in the EIAR or conditions/modifications from An Bord Pleanála in relation to the Proposed Scheme application.

iii) Utilities – ESB Substation

Chapter 19 Material Assets in Volume 2 of the EIAR assesses the potential impact of construction works on major infrastructure and utilities. Section 19.5.1.1 goes on to state that the Proposed Scheme has been designed to minimise the impact on major infrastructure. This includes the avoidance of interactions with major utility infrastructure as far as possible. As identified on Sheet Number 14 in Appendix B13 ESB Asset Alterations of the Preliminary Design Report provided in the Supplementary Information, no diversions are proposed at this substation and the intention is for it to remain in its current position, therefore there will be no impact on this substation.

iv) Duration of Works

Section 5.3.2.3 of Chapter 5 of Volume 2 of the EIAR provides details of the construction activities along Swords Road, between Old Airport Road and Northwood Avenue. The expected construction duration for the section will be approximately 18 months. However, construction activities at individual plots will have shorter durations than outlined in overview of construction works presented Section 5.3. The duration of the works will vary from property to property, but access and egress will be maintained at all times.

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on each landowner whose land is being acquired. Following service of the Notice to Treat, each landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage their own agent / valuer in preparing, negotiating, and advising on compensation.

CPO-02 – Advanced Roofing and Cladding Ltd.

Summary of Objections Raised

The objection to the CPO raises four potential issues:

i) Access

The objection raised concerns regarding the access to the business park. The objection states that the business onsite cannot have access blocked or interrupted at any time, as safe and constant access is required throughout the Scheme process.

The objection requests a condition is added to the permission granted that ensures access to the Advanced Business Park at all times.

ii) Duration of Works

The objection raised concerns that no information was distributed about how long these works will take or what disruption will be involved. The objection comments they do not want their business or tenants' businesses to be negatively affected because of these works.

iii) Security

The objection states that it should be requirement that any alterations made as part of the CPO to the respondent's perimeter structures should be reinstated to the same standard or better. The objection further comments that the security of the business park is now compromised by the works.

iv) Utilities – ESB Substation

The objection does not agree to the substation being moved further into their property as it would have an impact on the entrance to the business park, therefore the objection requests further information on what is intended in relation to the substation.

Response to Objection Raised

i) Access

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 Section 5.5.3.2 of Chapter 5 of Volume 2 of the EIAR, '*details regarding temporary access provisions will be discussed with residents and business owners prior to construction starting in the area. The duration of the works will vary from property to property, but access and egress will be maintained at all times'*.

Detailed accommodation works plans will be prepared in consultation with landowners in line with any formal agreements and in accordance with any embedded mitigations identified in the EIAR or conditions/modifications from An Bord Pleanála in relation to the Proposed Scheme application.

ii) Duration of Works

Section 5.3.2.3 of Chapter 5 of Volume 2 of the EIAR provides details of the construction activities along Swords Road, between Old Airport Road and Northwood Avenue. The expected construction duration for the section will be approximately 18 months. However, construction activities at individual plots will have shorter durations than outlined in overview of construction works presented Section 5.3. The duration of the works will vary from property to property, but access and egress will be maintained at all times.

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on each landowner whose land is being acquired. Following service of the Notice to Treat, each landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage their own agent / valuer in preparing, negotiating, and advising on compensation.

iii) Security

Section 17.5.1 of Chapter 17 Landscape (Townscape) & Visual of Volume 2 of the EIAR states '*where properties are subject to permanent and/or temporary acquisition appropriate measures will be put in place by the appointed contractor to provide for protection of features, trees and vegetation to be retained, and for continued access during construction and for adequate security and screening of construction works. All temporary acquisition areas will be fully decommissioned and reinstated at the end of the Construction Phase or at the earliest time after the reinstatement works are completed to the satisfaction of the NTA*'.

Reinstatement of property frontage including boundary walls, gates, railings, driveway, footpath and landscaping will be on a like for like basis and detailed accommodation works plans will be prepared in consultation with landowners in line with any formal agreements and in accordance with any embedded mitigations identified in the EIAR or conditions/modifications from An Bord Pleanála in relation to the Proposed Scheme application.

iv) Utilities – ESB Substation

Chapter 19 Material Assets in Volume 2 of the EIAR assesses the potential impact of construction works on major infrastructure and utilities. Section 19.5.1.1 goes on to state that the Proposed Scheme has been designed to minimise the impact on major infrastructure. This includes the avoidance of interactions with major utility infrastructure as far as possible. In Appendix B13 ESB Asset Alterations of the Preliminary Design Report provided in the Supplementary Information, no diversions are proposed at this substation and it will remain in its current position, therefore there will be no impact on this substation.

CPO-20 – Menapia Car Hire Unlimited Company

Summary of Objections Raised

The objection to the CPO raises the following potential issues:

i) Boundary Wall and Site Security

The objection comments that their client wishes to ensure that the reinstated boundary is of the standard of the existing fence and wall. Furthermore, it is requested that the developer is requested to reinstate a wall and fence of equal or better standard than existing; and that a condition is added to the permission granted to ensure access for the client to their land at all times.

They further state that their client requests that a condition is attached to any grant of permission to require the developer to secure the site during construction. This should include hoarding or fencing with additional concrete blocks (1 or 2 tonne) to stop vehicles accessing the site, preventing materials from being stolen.

Response to Objection Raised

i) Boundary Wall and Site Security

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 Section 5.5.3.2 of Chapter 5 Construction of Volume 2 of the EIAR, '*details regarding temporary access provisions will be discussed with residents and business owners prior to construction starting in the area. The duration of the works will vary from property to property, but access and egress will be maintained at all times'*.

Section 4.6.18.1 of EIAR Chapter 4 provides a summary of the accommodation works and boundary treatment for the entirety of the Proposed Scheme and notes that '*there are a number of areas along the extents of the route where the Proposed Scheme will result in the requirement for accommodation works and boundary treatments'*, with '*specific accommodation works… considered on a case-by-case basis'*. Section 4.6.18.1 goes on to state that '*To maintain the character and setting of the Proposed Scheme, the approach to undertaking the new boundary treatment works along the corridor is replacement on a 'like for like' basis in terms of material selection and general aesthetics, unless a section of street can benefit from urban improvement appropriate to the area'.*

Reinstatement of the property frontage will be on a like for like basis at this location and detailed accommodation works plans will be prepared in consultation with the landowner in line with any formal agreements and in accordance with any embedded mitigations identified in the EIAR or conditions/modifications from An Bord Pleanála in relation to the Proposed Scheme application. With regards to temporary boundary treatment during construction, Section 5.10.5 of EIAR Chapter 5 states the following: '*The requirements of Number 10 of 2005 - Safety, Health and Welfare at Work Act 2005, S.I. No. 291/2013 -Safety, Health and Welfare at Work (Construction) Regulations 2013 (hereafter referred to as the Regulations) and other relevant Irish and European Union safety legislation will be complied with at all times. As required by the Regulations, a Health and Safety Plan will be formulated which will address health and safety issues from the design stages through to the completion of the Construction Phase. This plan will be reviewed as the Proposed Scheme progresses. The contents of the Health and Safety Plan will follow the requirements of the Regulations'.*

Section 17.5.1 of EIAR Chapter 17 describes the construction phase mitigation and management measures which are proposed to avoid, reduce or remediate, wherever practicable significant negative landscape (townscape) and visual effects of the Construction Phase of the Proposed Scheme. It is noted that '*appropriate measures will be put in place by the appointed contractor…for continued access during construction and for adequate security and screening of construction works'*.

CPO-22 – Nesta Ltd

Summary of Objections Raised

The objection to the CPO raises three potential issues:

i) Access

Nesta cannot be accessed from any other road and given the nature of the business (warehousing and office), any impediment to the existing vehicular access point, whether it be on a permanent or temporary basis, would be devastating to the business and would also adversely impact customers whose goods are stored on site. The nature of the business means that its operation is reliant on good quality continuous vehicular access.

ii) Planning Context

Nesta is zoned 'GE- General Employment'. The use of Nesta for warehousing and office use is fully consistent with the zoning objective. Blocking or restricting vehicular access to the premises would not be consistent with the zonings vision.

iii) Impact to Business

In addition to providing vehicular access, those lands also enable vehicles and user of Nesta Santry to safely pull in from the Swords Road and to alight from their vehicles to open the gate, if necessary. Nesta is highly concerned that the acquisition of these lands for the purpose, inter alia, of storage of materials for construction works for an unknown duration will adversely affect their business.

For reasons set out above it is considered that the Order, if confirmed, would have a disproportionate impact on Nesta's property rights, would diminish the value of its property and its business, and would be contrary to proper planning and sustainable development of the area. Nesta therefore requests that the Board refuse to confirm the Order. Alternatively, the Board might consider amending the Order such that is will not require the acquisition of Nesta's lands.

Response to Objection Raised

i) Access

When roads and streets are being upgraded, there will be some temporary disruption / alterations to on-street and off-street parking provision, and access to premises in certain locations along the Proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. As described in Section 5.5.3.2 of Chapter 5 Construction of Volume 2 of the EIAR, '*details regarding temporary access provisions will be discussed with residents and business owners prior to construction starting in the area. The duration of the works will vary from property to property, but access and egress will be maintained at all times'*.

Detailed accommodation works plans will be prepared in consultation with landowners in line with any formal agreements and in accordance with any embedded mitigations identified in the EIAR or conditions/modifications from An Bord Pleanála in relation to the CPO.

ii) Planning Context

As outlined in point i) above, vehicular access to the premises will not be blocked or restricted as a result of the Proposed Scheme at the Construction Phase . During the Operational Phase, there will be no restrictions to the access, as indicated on Sheet 14, General Arrangement Drawings in the EIAR, Volume 3 Figures, Chapter 4 Proposed Scheme Description, 03. The extract of the General Arrangement drawing is shown in Figure 2.3.

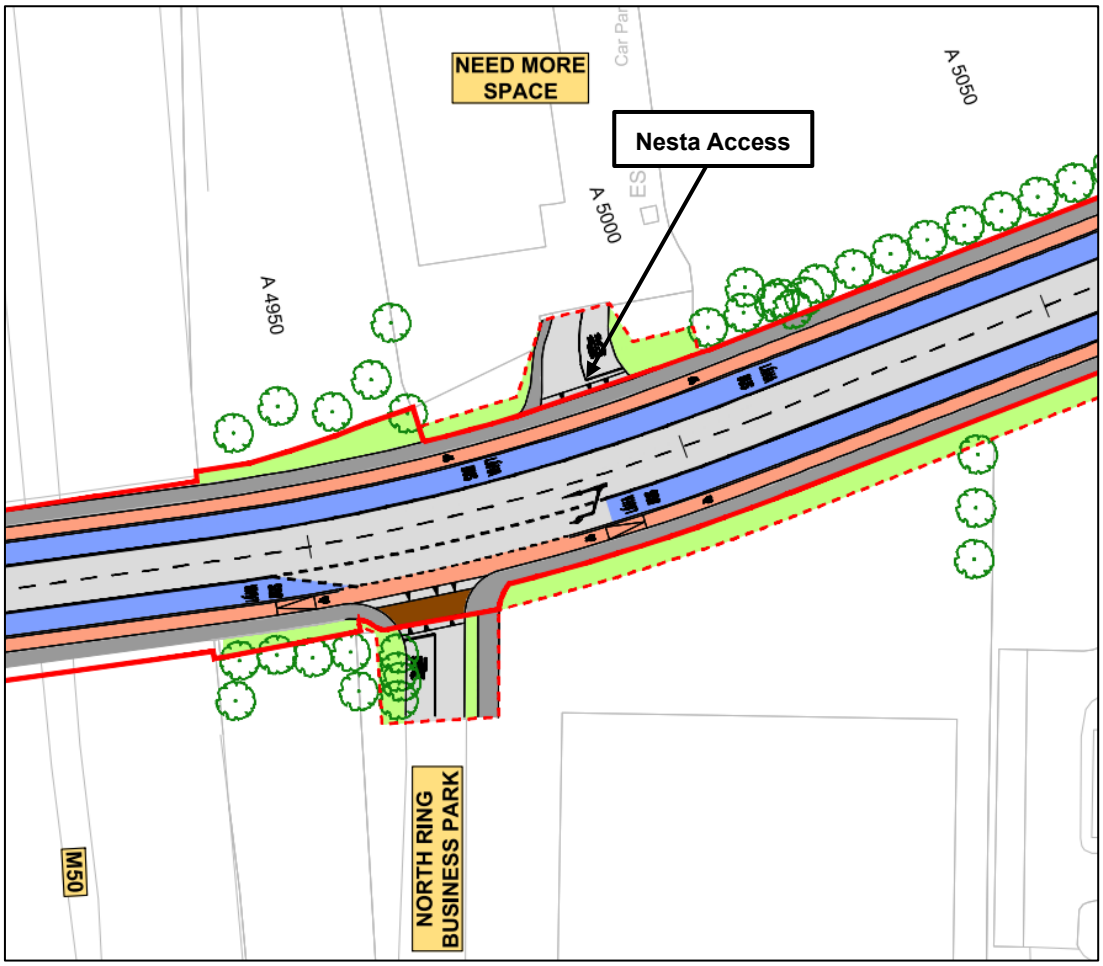

Figure 2.3 General Arrangement of Proposed Scheme at Nesta Storage (Sheet 14)

iii) Impact to Business

The Proposed Scheme has been designed to deliver upon the scheme objectives set out in Chapter 1 of the EIAR, which include enhancement of the potential for cycling by providing safe infrastructure for cycling. In some areas, land acquisition is required to deliver what has been determined to be the most appropriate design configuration that meets these objectives. All areas included in the CPO have been carefully considered and only included where deemed absolutely necessary to meet the scheme objectives and to construct the scheme with permanent and temporary acquisitions respectively.

Chapter 10 (Population) in Volume 2 of the EIAR includes an assessment of the impact on commercial properties as a result of land take during both the Construction Phase (Section 10.4.3.2.2.1) and the Operational Phase (Section 10.4.4.2.2.1). The commercial properties which were assessed are listed in the Chapter's Appendix A10.1 (Schedule of Commercial Businesses) in Volume 4 Part 3 of the EIAR, of which the Nesta facility in Santry is entry number 41. The facility was not assessed as being significantly impacted by either the construction or operation phases of the Proposed Scheme as summarised in the aforementioned Sections.

In this specific area, the proposed cross-section and subsequent land acquisition have been considered and deemed necessary to facilitate the optimum scheme as presented in EIAR Volume 3 Figures, Chapter 4 Proposed Scheme Description, General Arrangement drawings.

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on each landowner whose land is being acquired. Following service of the Notice to Treat, each landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage their own agent / valuer in preparing, negotiating, and advising on compensation.

2.2 Swords Road (Properties 298 and 300) – CPO-16 and CPO-19

2.2.1 Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor, it is proposed to provide a footpath, bus lane and general traffic lane in each direction. It is proposed to redirect cyclists through Lorcan Road and Shanrath Road as a Quiet Street.

The existing road cross section in this location provides a footpath on each side of the road with one general traffic lane and advisory cycle lane in each direction.

In order to achieve the required cross section of the Proposed Scheme land acquisition is necessary from private properties along this section of Swords Road.

The land take required is shown in the following:

- relevant extract of the EIAR Volume 3 Chapter 4 Proposed Scheme Description Figures, General Arrangement drawings in Figure 2.4.
- and the existing aerial view in Figure 2.5

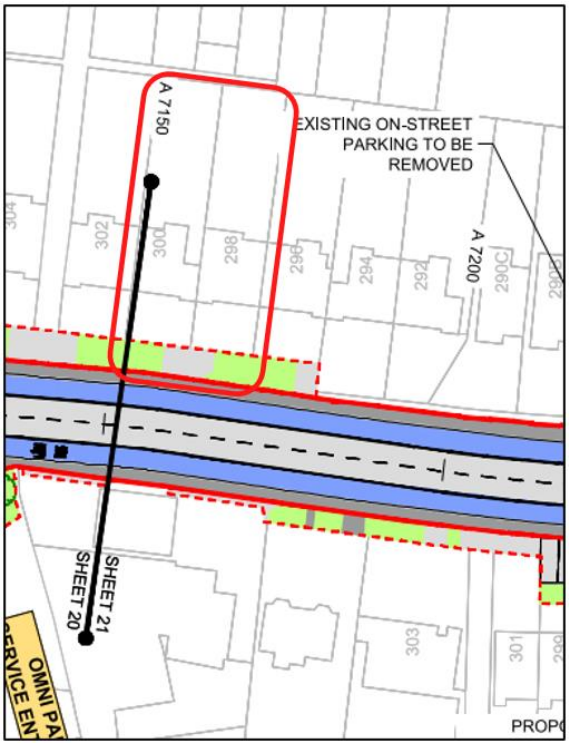

Figure 2.4 Proposed New Layout at Swords Road

Figure 2.5 Existing Aerial View on Swords Road

Objections CPO-16 and CPO-19, which relate to two separate CPO plots that are adjacent to each other, are responded to individually below.

CPO-16 – Kathleen McKee

Summary of Objections Raised

The objection to the CPO challenges the following:

i) Relevant statutory functions and powers of the NTA.

ii) Questions the purposes for which the CPO has been made.

iii) Assertions in relation to Constitutional Rights.

iv) Effects on the environment of the proposed development.

v) The potential impact of the presence and operation of the development in terms of health, security, general amenity and property values.

vi) Disruption during the construction stage has not been addressed properly.

vii) Potential impact of the disruption as a result of temporary acquisition of lands has not been addressed properly.

viii) Potential impact of the proposed in terms of long-term impact to climate change has not been properly or adequately assessed.

ix) The proposed development will result in a negative visual impact for residential property owners and road users.

x) The Proposed Scheme will result in increased traffic congestion and operational problems on the road networks, the impact has not been properly or adequately assessed.

Response to Objections Raised

i) Relevant statutory functions and powers of the NTA

The objection raises a number of queries in relation to the functions and powers of the NTA, and the statutory bases on which the NTA has made the CPO. It is clear from the CPO itself and on the statutory notice served therein that the lands are being acquired for the purposes of the Swords to

City Centre Core Bus Corridor Scheme to facilitate public transport, and such issues have been comprehensively addressed in Chapter 1 Introduction of Volume 2 of the EIAR. They are also explained below in response to this objection.

It is a function of the NTA under section 44(1)(a) of the Dublin Transport Authority Act 2008 (as amended) (the "**2008 Act**") to "*secure the provision of, or to provide, public transport infrastructure*", which includes the provision of the Swords to City Centre Core Bus Corridor Scheme. [1]

In that regard, and as set out in Section 1.4 of Chapter 1 of the EIAR, the NTA has decided in accordance with Section 44(2)(b) of the 2008 Act that the functions in relation to securing the provision of public transport infrastructure should be performed by the NTA.

Section 44(6) of the 2008 Act goes on to provide as follows in relation to the exercise of these functions by the NTA:-

> *"(6) Where—*
>
> *(a) a decision is made by the Authority under subsection (2)(b) or (5)(a) for the performance of a particular function otherwise than through a public transport authority or statutory body, or*
>
> *(b) the Authority is performing its function of securing the provision of public transport infrastructure in accordance with subsection (2)(e),*
>
> *the following provisions have effect—*
>
> *(i) the Authority shall be empowered (notwithstanding any other enactment) to perform the function, including the acquisition of land for that purpose, and to do any other thing which arises out of or is consequential on or is necessary for the purposes of or would facilitate the performance of the function,*
>
> *(ii) for the purpose of paragraph (a) or (b), land may be acquired by agreement or by means of a compulsory purchase order made by the Authority in accordance with Part XIV of the Act of 2000,*
>
> *(iii) the provisions of any enactment concerned (other than section 178 of the Act of 2000) apply in relation to the performance of the function subject to such modifications as may be necessary and as if the Authority was named in such enactment in each place where a public transport authority body entitled to exercise the function is named, …"*

Therefore, under section 44(6) of the 2008 Act, the NTA is empowered to acquire lands by agreement or by means of a compulsory purchase order in accordance with Part XIV of the Planning and Development Act 2000 (as amended) (the "**2000 Act**"), for the purposes of performing its function of providing public transport infrastructure (and in this instance providing the Swords to City Centre Core Bus Corridor Scheme), and such compulsory purchase order may, by virtue of section 10(4)(d) of the Local Government (No. 2) Act 1960 (as amended), authorise the NTA to extinguish a public right of way.

Section 44(7) of the 2008 Act goes on to provide that the 2000 Act applies to a compulsory acquisition of land under, for example, section 44(6) of the 2008 Act, as if it were an acquisition under Part XIV of the 2000 Act and for that purpose a reference to a local authority shall be read as a reference to the NTA.

Section 213 of the 2000 Act is contained in Part XIV of the 2000 Act and is referenced on the face of the CPO for the Proposed Scheme. Section 213(1) of the 2000 Act provides that *'the power conferred on a local authority* [to be read as the NTA by virtue of section 44 of the 2008 Act] *shall be construed in accordance with this section"*.

Section 213(2) of the 2000 Act states:-

[1] *"public transport infrastructure" is defined in section 2 of the 2008 Act as "infrastructure constructed or provided, or proposed to be constructed or provided, in connection with the provision of public passenger transport services, which includes but is not limited to railway infrastructure, metro railway infrastructure, light railway infrastructure, bus infrastructure, rolling stock, buses, busways, bus lanes, bus garages, cycleways, cycle and pedestrian facilities, interchange facilities or such other class of infrastructure, facility, building or vehicle, whether of the same kind as the aforementioned or not, which the Authority has prescribed to be public transport infrastructure under section 44(13)"*

'*A local authority* [to be read as the NTA by virtue of section 44 of the 2008 Act] *may, for the purposes of performing any of its functions (whether conferred by or under this Act, or any other enactment passed before or after the passing of this Act),… do all or any of the following:-*

(i) acquire land, permanently or temporarily, by agreement or compulsorily,

(ii) acquire, permanently or temporarily, by agreement or compulsorily, any easement, way-leave, water-right or other right over or in respect of any land or water or any substratum of land,

(iii) restrict or otherwise interfere with, permanently or temporarily, by agreement or compulsorily, any easement, way-leave, water-right or other right over or in respect of any land or water or any substratum of land, and the performance of all or any of the functions referred to in subparagraphs (i), (ii) and (iii) are referred to in this Act as an "acquisition of land".

Section 213(4) of the 2000 Act states:-

'a local authority may be authorised by compulsory purchase order to acquire land for any of the purposes referred to in subsection (2) of this section and section 10 (as amended by section 86 of the Housing Act, 1966) of the Local Government (No. 2) Act, 1960, shall be construed so as to apply accordingly and the references to "purposes" in section 10 (1)(a) of that Act shall be construed as including purposes referred to in subsection (2) of this section".

Having regard to the provisions of section 213 of the 2000 Act, reference is therefore correctly made on the face of the CPO for the Proposed Scheme to *"Section 10 of the Local Government (No. 2) Act, 1960 as substituted by Section 86 of the Housing Act, 1966 as amended by Section 6 and the Second Schedule of the Roads Act, 1993"*.

Further, section 10 of the *Local Government (No. 2) Act, 1960* (the "**1960 Act**") operates, for example, to apply the provisions of section 76 of the Housing Act 1966 (the "**1966 Act**"), and the Third Schedule thereto. Therefore, reference is correctly made on the face of the CPO for the Proposed Scheme to section 76 of the 1966 Act and the Third Schedule thereto, and the processes and procedures set out in section 76 of the 1966 Act and the Third Schedule to the 1966 Act have, accordingly, been followed by the NTA in submitting the CPO for the Proposed Scheme to An Bord Pleanála (the "**Board**") for confirmation. Indeed, the statutory notice which was served on the objector is that required by Article 4(b) of the Third Schedule to the 1966 Act.

Finally, reference is also correctly made on the face of the CPO for the Proposed Scheme to section 184 of the *Local Government Act 2001 (as amended)* (the "**2001 Act**"), given that section 184 of the 2001 Act clarifies the rights referenced in section 213(2)(a) of the 2000 Act (referenced above), as including any easement, way-leave, water right or other right to which section 213(2)(a) applies granted by or held from the local authority acquiring the land [the reference to local authority here should, by virtue of section 44 of the 2008 Act, be read as a reference to the NTA].

Therefore, there is no question but that the NTA has relied on the correct statutory bases in making the CPO for the Proposed Scheme, and has followed the correct processes and procedures as set out in the appropriate legislative framework in submitting the CPO for the Proposed Scheme to the Board for confirmation.

ii) Purposes for which the CPO has been made

The objection also raises queries in relation to the purposes for which the NTA has made the CPO. As set out in paragraph 2 of the statutory notice which was served upon the objector, the CPO is *"for the purposes of the construction of the Swords to City Centre Core Bus Corridor Scheme together with all ancillary and consequential works associated therewith for the purposes of facilitating public transport"*. Further, the face of the CPO itself also indicates that it is "*for the purposes of facilitating public transport"*.

Further, as set out in paragraph 10 of that notice, the EIAR which was prepared in respect of the Swords to City Centre Core Bus Corridor Scheme was available for inspection physically and on the NTA's dedicated website for this Proposed Scheme, and that EIAR contains all of the *"precise*

details of the proposed construction works" and all of the *"proposed ancillary and consequential works for the Swords to City Centre Core Bus Corridor Scheme"* as requested in paragraphs 9 and 10 of this objection (CPO-16).

The lands at plot numbers 1133(1).1d and 1133(2).2d are proposed to be compulsorily acquired for the specific purposes of widening of the existing road corridor to facilitate a bus lane in each direction. As a result, the existing boundary wall of 300 Swords Road will be set back from its original position. The temporary land take is to facilitate the construction of this wall and to tie the driveway to any level differences with the Proposed Scheme as depicted in General Arrangement Drawing Sheet 20 of 37 of the EIAR Volume 3 Figures Chapter 4 Proposed Scheme Description, General Arrangement drawings and as detailed in Section 4.5.3.1 in Chapter 4 of Volume 2 of the EIAR.

Indeed, as the Board is aware, the NTA has also made an application to the Board under section 51 of the Roads Act 1993 (as amended) for approval of the proposed road development, the Swords to City Centre Core Bus Corridor Scheme, which is currently pending before the Board (ABP-Ref No. HA06D.317121).

iii) Assertions in relation to Constitutional Rights

The objection makes a number of assertions that the NTA has acted in breach of the objector's constitutional rights, has acted *ultra vires*, and has "*failed to act in accordance with the principles of basic fairness of procedures and natural/constitutional justice*" in making this CPO and in serving this statutory notice on the objector.

In addition to the lawfulness of the proposed compulsory acquisitions (as coming within the powers of the NTA as outlined above), the acquisitions are considered proportionate. In this latter regard, the courts have established that the power conferred to compulsorily acquire land must be exercised in accordance with the requirements of the constitution, including respecting the property rights of the affected landowner. The confirming authority (being the Board) must be satisfied that the acquisition of the property is clearly justified by the exigencies of the common good.

Accordingly, in applying the proportionality test, the NTA did (in making the Swords to City Centre Core Bus Corridor Compulsory Purchase Order 2023) ensure, and the Board should (in confirming the CPO) ensure that:

(i) there is a need that advances the common good which is to be met by the acquisition of the lands in question;

(ii) the particular property is suitable to meet that need;

(iii) any alternative methods of meeting the need have been considered; and

(iv) that the landowner is entitled to be compensated.

Chapter 2 of Volume 2 of the EIAR sets out how there is significant evidence to satisfy the requirement that there is a need that advances the common good. It is axiomatic that the acquisition of land and rights over land will result in interference with the use of those lands by owners/leases/occupiers. However, such interference is proportionate to the legitimate aim being pursued in the interests of the common good.

As detailed in Chapter 3 of Volume 2 of the EIAR, the NTA considered the reasonable alternatives to meet the need with the requirements of the EIA Directive which requires *"a description of the reasonable alternatives (for example in terms of project design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of environmental effects"*

The Emerging Preferred Route proposed a northbound one-way traffic system between the Omni Park Shopping Centre and the Shantalla Road junction, along with bus lanes in both directions, and a new slip road allowing southbound traffic onto the bypass to exit onto Shantalla at the N1/M50 bridge. As this section of the Swords Road is not wide enough to provide segregated cycle facilities, it was proposed to redirect cyclists through Coolock Lane and to an offline, two-way cycle track adjacent to Oak Park Avenue, running parallel to west of Santry Bypass (N1/M50) and connection at the Shanrath Junction. Following consultation feedback received from members of the public following the first non-statutory public consultations held from the 14th of November 2018 to the

29th of March 2019, it became apparent that the one-way proposal for general traffic might affect the existing access/egress arrangements for residents along the Lorcan and Shanrath Roads and impact on commercial deliveries and local business.

Section 3.4.1.1 of Chapter 3 of the EIAR set out that design development and assessment work was carried out at the Draft Preferred Route Option Stage on this section of the Proposed Scheme. This is also documented in Section 6.2.2.2 of the Preferred Route Option Report (provided as part of the Supplementary Information of the EIAR), looked at a one-way option through Santry Village, which was considered.

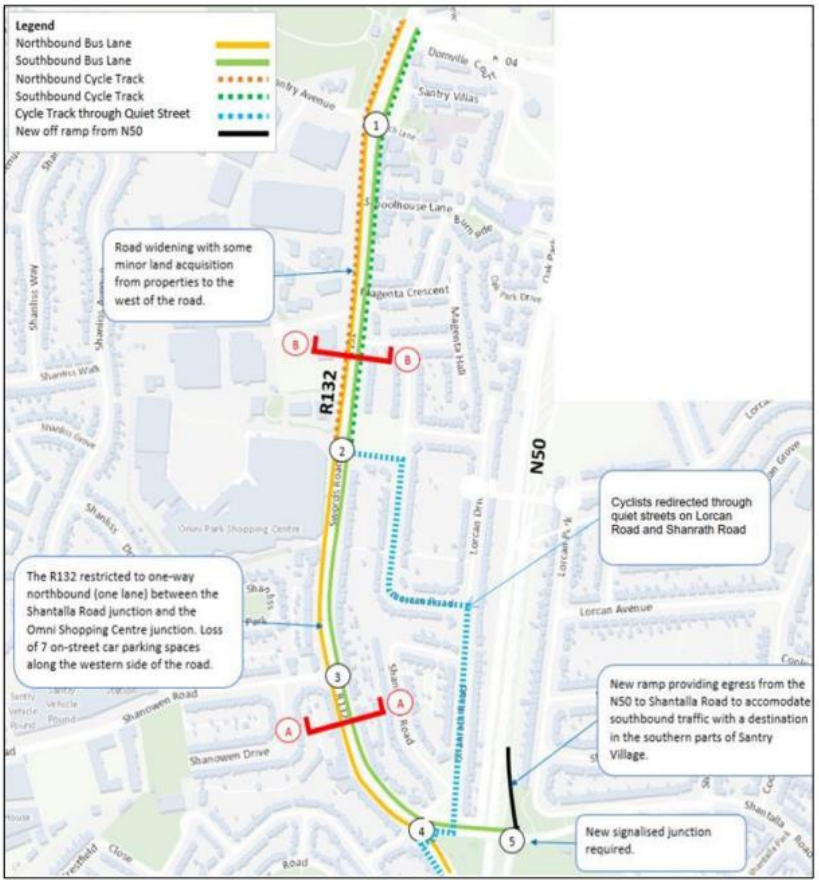

Figure 2.6 One-Way Route Option through Santry Village (Option SY1C)

This option removes southbound traffic between Omni Shopping Centre and Shantalla Road to minimise land acquisition on Swords Road for this section of the scheme. A bus lane would be provided in each direction but only one traffic lane (northbound) would be maintained for general traffic.

Combined with the proposal to redirect cyclists through Lorcan Road and Shanrath Road this option would negate the need for any land acquisition along this section of the scheme.

To allow access from the north to properties in the south of Santry Village, this option would require the construction of a new southbound slip road off the N50 at Shantalla Road. The new slip road would join the Shantalla Road via a new signalised junction.

A cross-section on Swords Road for this scheme option is illustrated in Figure 2.13.

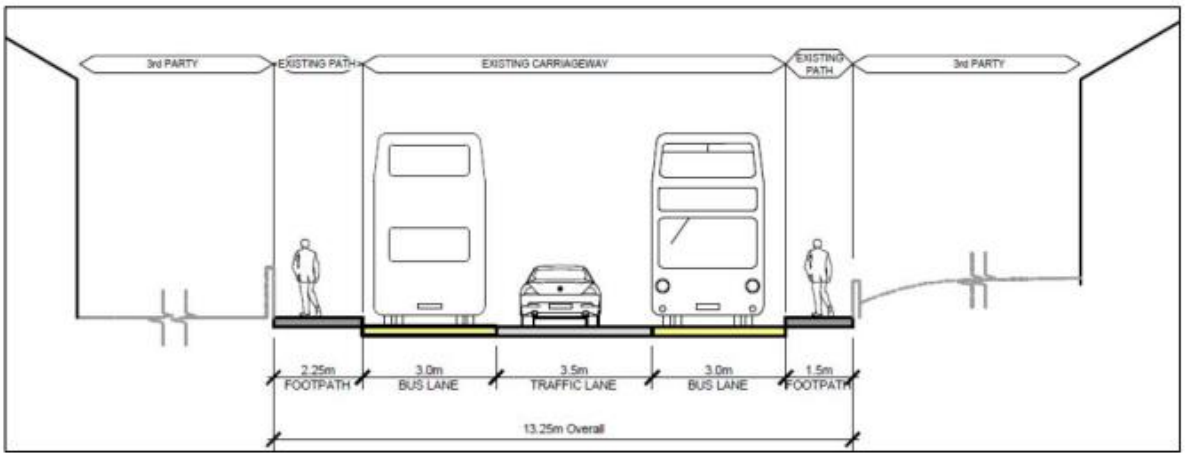

Figure 2.7 One-Way Route Option through Santry Village (Option SY1C)

The proposed traffic management changes would have a direct impact on traffic routes to, from and through the southern part of Santry Village.

The Stage 2 Route Options Assessment – Multi-Criteria Analysis table for this section is included in Appendix A of the Preferred Route Option Report.

A summary of the assessment and relative ranking of route options against the five main assessment criteria is presented in Table 2.3 below.

Table 2.1 Santry Village Final Summary of MCA

Assessment Criteria	Option 1 (SY1B) Two-Way Option	Option 2 (SY1C) One-Way Option
Economy		
Integration		
Accessibility and Social Inclusion		
Safety		
Environment		

Signal-controlled bus priority (similar to that adopted at Santry Demesne, see Section 6.2.1 of the Preferred Route Options Report) was also considered as an option through Santry Village, in order to reduce the impact on land take. For signal-controlled bus priority to operate successfully, queue lengths from the next junction cannot be allowed to develop on the shared bus/traffic lane portion, as this would result in delays to the bus service. Junction modelling of this option through Santry Village showed extensive queuing at the Lorcan Road/Omni Park Shopping Centre, Shanowen Road and Shanrath Road junctions, which are in close proximity to each other (300m between the Lorcan Road/Omni Park and Shanowen Road junctions and 250m between the Shanowen Road and Shanrath Road junctions). On this basis, signal-controlled bus priority was discounted as a feasible option through Santry Village.

Based on the following key findings from the Multi-Criteria Assessment undertaken for this section of the study area, Route Option SY1B (two-way option) is the Preferred Route Option for the following reasons:

- It performs more favourably under the Integration criterion because this option requires no changes to the current traffic management regime in Santry. SY1C would require detours and increased journey times for traffic travelling to and from the north with an origin or destination in the southern parts of Santry and people travelling south from the southern parts of Santry;

- It performs more favourably under the Accessibility and Social Inclusion criterion because under Option SY1C, journey times of the regular trips made by local residents living between the Omni Park Shopping Centre and Shantalla Road/Swords Road Roundabout would be increased.

In addition to the above alternative solution which specific to Santry Village, Chapter 3 of the EIAR sets out the reasonable alternatives studies and the main reasons for the selection of the Proposed Scheme taking into account the effects on the environment. Within this Chapter consideration is given to strategic alternatives including both light rail and metro. Section 3.2.5 of this chapter states that the appropriate type of public transport provision in any particular case is predominately determined by the likely quantum of passenger demand along the particular public transport route.

'For urban transport systems, bus-based transport is the appropriate public transport mode for passenger demand levels of up to 4,000 passengers per hour per direction. (UITP 2009). Light rail provision would generally be appropriate to cater for passenger demand of between 3,500 and about 7,000 passengers per hour per direction. Passenger demand levels above 7,000 passengers per hour per direction would generally be catered for by heavy rail or metro modes, which would usually be expected to serve a number of major origins or destinations along a Particular corridor. In the case of both the bus and light rail modes, higher levels of passenger demand than the above stated figures can be accommodated under specific conditions.

The development of the prior GDA Transport Strategy considered the likely public transport passenger demand levels across the region using the NTA's transport model and took into account the other studies referenced above, in addition to studies that had been carried out to investigate a potential light rail scheme within the area of this corridor. Likely passenger flows were identified to be within the capacity of bus transport, without reaching the quantum of passenger demand which would support the provision of a higher capacity rail solutions in addition to a Metrolink. Section 3.2.1 set out various studies undertaken for the prior GDA Transport Strategy. Arising from these studies and the specific assessment and transport modelling work undertaken for the prior Strategy, it was concluded that a bus-based transport system would be the proposed public transport solution in the corridor of the Proposed Scheme. The proposed transport solution would be supplemented by Metro, to provide more passenger capacity and enhanced interchange between the Luas Red and Green Line Services, proposed Metrolink Station at Fosterstown, Sligo/Maynooth Line Heavy Rail Services at Drumcondra Station and the Suburban Interchange between the Orbital and Radial Routes at Coolock Lane. It was considered that there would be insufficient demand to justify the provision of an additional light rail alternative beyond what is proposed above, particularly given the low to medium density nature of development in this corridor.

Similar to BRT, the light rail option would be worse for the environment in terms of construction impacts, including flora and fauna, heritage, air and noise, compared to the CBC proposal. Light rail requires continuous unbroken physical lane infrastructure to achieve high-priority. This would involve significantly more land take and potentially involve demolition of buildings at pinch-points. In the case of the CBC proposals, bus-priority can be achieved through short lengths at pinch-points by the use of signal-controlled priority.

Given the consideration of light rail provision, and the level of likely public passenger use along this overall corridor assessed in the transport modelling work, the development of the prior GDA Transport Strategy identified that a Metro solution would be economically justified within the area covered by this corridor. Therefore, it is intended to develop the light rail Metro system along this corridor through the implementation of MetroLink.

Arising from the various studies and analysis that had been carried out, and the specific assessment and transport modelling work undertaken for the prior GDA Transport Strategy, 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. This is because 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'.

With respect to congestion charging, Section 3.2.8 of the EIAR states that a key success factor of demand management is greater use of alternative travel modes, in particular public transport. In

the case of Dublin, the existing public transport system does not currently have sufficient capacity to cater for larger volumes of additional users.

'In advance of a significant uplift in overall public transport capacity in the Dublin metropolitan area, the implementation of major demand management measures across that area would be unsuccessful. Effectively constraining people from making journeys by car and requiring them to use other modes, without those modes having the necessary capacity to cater for such transfer, would not deliver an effective overall transport system. Instead, the capacity of the public transport system needs to be built up in advance of, or in conjunction with, the introduction of major demand management measures in the Dublin metropolitan area. This is especially true in the case of the bus system where a major increase in bus capacity through measures such as the Proposed Scheme would be required for the successful implementation of large-scale demand management initiatives.

While the foregoing addresses the dependency of demand management measures on public transport capacity, it is equally correct that the provision of greatly enhanced cycling facilities will also be required to cater for the anticipated increase in cycling numbers, both in the absence of demand management measures and, even more so, with the implementation of such measures. Demand management initiatives by themselves will not deliver the level of segregated cycling infrastructure required to support the growth in that mode. Consequently, the progression of demand management proposals will not secure the enhanced safe cycling infrastructure envisaged under the Proposed Scheme'.

Finally it is noted that park and ride and cashless fares both form part of the broader BusConnects programme and may be implemented to complement improvements to the overall bus system, including the Proposed Scheme infrastructure.

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on each landowner whose land is being acquired. Following service of the Notice to Treat, each landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage their own agent / valuer in preparing, negotiating, and advising on compensation.

In light of all of the above, the NTA is satisfied that it has not acted *ultra vires* or in abuse of its powers, and that the making of the CPO is reasonable and justified and does not represent a disproportionate interference with the objectors constitutionally protected property rights.

iv) Effects on the environment of the proposed development such as noise, traffic volumes, increase in private transport causing harmful emissions and health hazards with living in close proximity to the proposed development.

With respect to construction activities leading to '*considerable increased traffic volumes and noise*', these potential impacts have been assessed within the EIAR.

Chapter 6 (Traffic & Transport) in Volume 2 of the EIAR and its Appendix A6.1 (Transport Impact Assessment) in Volume 4 Part 2 of the EIAR provide the impact assessment for traffic and transport for both the Construction and Operational Phases of the Proposed Scheme. The methodology for undertaking the assessments are described in Section 6.2 of Chapter 6 and Section 4 of Appendix A6.1.

The Construction Phase impact assessment is described in Section 6.4.5 of Chapter 6 and Section 6.5 of Appendix A6.1. As summarised in Chapter 6, Section 6.4.5.5 (Table 6.22) the predicted impact on general traffic during the Construction Phase as a result of '*Restrictions to general traffic along Proposed Scheme*' is Negative, Moderate and Temporary, while the predicted impact as a result of '*Additional construction traffic flows upon surrounding road network*' is Negative, Slight and Temporary. Mitigation measures to manage traffic impacts as a result of construction as described in Section 6.4.5.4.6.1 and 6.4.5.4.6.2 of Chapter 6 respectively will include:

- '*The appointed contractor will develop a CTMP that gives due consideration to provision of local access requirements and designates appropriate diversion routes in the case where localised temporary closures are required*'; and
- '*The appointed contractor will prepare a Construction Stage Mobility Management Plan (CSMMP) which will be developed prior to construction, as described in*

Appendix A5.1 CEMP in Volume 4 of this EIAR, to actively discourage personnel from using private vehicles to travel to site. The CSMMP will promote the use of public transport, cycling and walking by personnel. Private parking at the Construction Compound will be limited. Vehicle sharing will be encouraged, subject to public health guidelines, where travel by private vehicle is a necessity, e.g. for transporting heavy equipment'.

Chapter 9 (Noise & Vibration) in Volume 2 of the EIAR provides an assessment of the potential noise impacts as a result of the Construction and Operational Phases of the Proposed Scheme. Section 9.4.3 provides the impact assessment for the Construction Phase, with Section 9.4.3.4.1 and Table 9.44 providing the summary of the potential construction noise impacts. The potential impact significance of construction traffic noise along the Proposed Scheme is illustrated in Figure 9.2 in Volume 3 of the EIAR, with the impact significance for the Swords Road in the vicinity of the 300 Swords Road categorised as Slight – Moderate (Sheet 3-4 of 5). Chapter 9 lays out the mitigation measures for the management of noise during the Construction Phase in Section 9.5.1, with all mitigation measures also recorded in Appendix A5.1 (Construction Environmental Management Plan (CEMP)) in Volume 4 Part 1 of the EIAR. Construction Phase mitigation measures as listed in Table 5.2 of the CEMP will include:

- NV2*: 'The appointed contractor will put in place the most appropriate noise control measures depending on the level of noise reduction required at individual working areas i.e., based on the construction threshold values for noise and vibration set out in Tables 9.7 and 9.10 in Chapter 9 (Noise & Vibration) of this EIAR. Reference to Table 9.37 in Chapter 9 (Noise & Vibration) of this EIAR indicates that intrusive works occurring within 25m to 45m of Noise Sensitive Locations (NSLs) will need specific noise control measures to reduce impacts depending on the time period over which they will occur, i.e., daytime or evening'*;

- NV8: *'Construction activities will be scheduled in a manner that reflects the location of the site and the nature of neighbouring properties. Construction activities / plant or equipment items will be considered with respect to their potential to exceed construction noise thresholds at NSLs and will be scheduled according to their noise level, proximity to sensitive locations and possible options for noise control. In situations where an activity with potential for exceedance of construction noise thresholds is scheduled (e.g., road widening and utility diversions or activities with similar noise levels identified in Table 9.22 in Chapter 9 (Noise & Vibration) of this EIAR). Other construction activities associated with the Proposed Scheme will be scheduled to avoid significant cumulative noise levels'*;

- NV9: *'The NTA will establish clear forms of communication that will involve the appointed contractor and NSLs in proximity to the works so that residents or building occupants are aware of the likely duration of activities likely to generate noise or vibration that are potentially significant as set out in Table 9.7 and Table 9.10 in Chapter 9 of this EIAR'*; and

- NV10: *'During the Construction Phase the appointed contractor will carry out noise monitoring at representative NSLs to evaluate and inform the requirement and / or implementation of noise management measures. Noise monitoring will be conducted in accordance with International Organization for Standardization (ISO) 1996–1 (ISO 2016) and ISO 1996–2 (ISO 2017). The selection of monitoring locations will be based on the nearest representative NSLs to the working area which will progress along the length of the Proposed Scheme'.*

<u>With respect to the observations that 'Private transport in the area will increase and take significantly longer to pass through the area causing extra harmful emissions and hazard', this has been assessed within the EIAR.</u>

Chapter 6 (Traffic & Transport) in Volume 2 of the EIAR provides an assessment of the impact the Proposed Scheme will have on traffic volumes once operational, both directly along the route of the Proposed Scheme, and on the surrounding road network. As described in Section 6.4.6.2.8 of Chapter 6, traffic modelling was carried out to assess the predicted traffic volumes in 2028 once the Proposed Scheme is fully operational, in both the AM and PM peak hours compared to the predicted traffic in the absence of the Proposed Scheme (the Do Minimum scenario). With respect

to the Swords Road in the vicinity of this property, the results of the modelling showed a decrease in general traffic during both the AM peak of 807 Passenger Car Units (Table 6.67 in Chapter 6), and the PM peak of 548 Passenger Car Units (Table 6.71 in Chapter 6).

With respect to harmful emissions, Chapter 7 (Air Quality) in Volume 2 of the EIAR describes the assessment of the potential impacts of the Proposed Scheme on air quality during the Construction and Operational Phases. Figures 7.3 to 7.5 show the modelled annual mean impacts to NO_2, PM_{10} and $PM_{2.5}$ respectively at receptors along the Proposed Scheme once the Proposed Scheme is operational, with the area in which 300 Swords Road is located shown on Sheet 2 of each of those figures. Along that stretch of the Swords Road, Figure 7.3 shows a Negligible to Moderate Beneficial change to NO_2, Figure 7.4 shows a Negligible change to PM_{10}, and Figure 7.5 shows a Negligible change to $PM_{2.5}$.

With respect to the observations that 'The health effects associated with living in close proximity to the proposed development have not been adequately or properly assessed', this has been assessed within the EIAR.

Chapter 11 (Human Health) of Volume 2 of the EIAR provides an assessment of the potential human health impact of the Proposed Scheme during both the Construction Phase (Section 11.4.3) and the Operational Phase (Section 11.4.4). Section 11.1 (Introduction) states that '*This assessment has been carried out according to best practice and guidelines relating to human health, and in the context of similar large-scale transport infrastructural projects*', with the Chapter going on to state in Section 11.2.4.2 that:

> '*The characteristics of the Proposed Scheme have been considered and the potential pathways between aspects of the construction and operation of the Proposed Scheme and health outcomes (beneficial and adverse) have been mapped out... Due to the nature of impacts on human health, many of these are indirect. The assessment of the Operational Phase of the Proposed Scheme has focused on those potential impacts most likely to be influenced by the Proposed Scheme, namely air quality, noise, community severance, social use of outdoor space, physical activity levels, access and risk of injuries. For the identification of construction impacts, reference has been made to the other environmental topic assessments to identify the aspects of the environment likely to be affected, and then a further consideration has been made as to whether there is a likely pathway between those impacts and human health outcomes.*'

The Construction Phase health impacts are summarised in Section 11.4.3.7 (Table 11.6), while the Operational Phase health impacts are summarised in Section 11.4.4.9 (Table 11.7). A description of the mitigation and monitoring measures proposed during both the Construction and Operational Phases are described in Section 11.5 of the Chapter.

Section 11.6 describes the predicted residual impacts after mitigation measures have been incorporated. With respect to Construction Phase residual impacts the Chapter states:

'*No significant residual impacts on health are predicted.*'

With respect to Operational Phase residual impacts the Chapter states:

'*Three issues were assessed as likely to be associated with significant residual impacts on human health, all of which were considered positive.*

Lack of regular physical activity is a leading cause of chronic disease and premature deaths. The Proposed Scheme will improve opportunities and convenience for walking and cycling, which will support many people in the study area in achieving recommended levels of weekly physical activity, for example as part of an active travel commute to work or education. It will also increase safety and the perception of safety for pedestrians and cyclists, who are more vulnerable to injury and mortality from traffic collisions. Furthermore, by redressing the balance between private car use and other forms of transport, the Proposed Scheme will improve public transport journey times and reliability, as well as introducing greatly improved active travel infrastructure. This will provide for a more equitable transport experience, including for those without access to a car.

The Proposed Scheme is expected to have a significantly positive contribution on health outcomes related to increased physical activity, equitable access to services and improved safety for vulnerable road users.

The significant positive impacts which are expected to arise in the Operational Phase fully align with the relevant objectives of the Proposed Scheme'.

v) The potential impact of the presence and operation of the development in terms of health, security, general amenity and property values.

With respect to potential health impact, Chapter 11 (Human Health) of Volume 2 of the EIAR provides an assessment of the potential impact of the Proposed Scheme during both the Construction Phase and the Operational Phase. In particular, Section 11.4.4 of the Chapter covers the potential health impacts of the Proposed Scheme once in place and fully operational. The Operational Phase health impacts are summarised in Section 11.4.4.9 (Table 11.7)

With respect to security, Appendix A10.2 (Economic Impact of Core Bus Corridors) in Volume 4 Part 3 of the EIAR assesses the potential economic impact of the Core Bus Corridors, which includes consideration of the impact on crime and anti-social activity. In Section 5 of the report, and specifically the section on 'The impact of transport infrastructure on crime', the conclusion states that:

'*The new infrastructure improvements should have a direct and immediate impact on crime along the corridors. It will provide better, safer and more visible bus stops whilst also improving the wider public realm infrastructure through investments such as improved street lighting. This will act as a direct deterrent to criminal activity and result in a reduction in crime. This in turn has been shown to encourage people onto the streets into the evening which will also support the night time economy in community centres*.'

With respect to general amenity, Chapter 17 (Landscape (Townscape) & Visual) in Volume 2 of the EIAR assesses the potential impacts during both the Construction and Operational Phases, including an assessment of the residual impacts at one year and 15 years post-construction. The assessment includes potential impacts on visual amenity and amenity designations along the Proposed Scheme. Chapter 10 (Population) in Volume 2 of the EIAR includes assessments of the potential impacts on both community amenity and commercial amenity, during both Construction and Operational Phases. With respect to the potential Operational Phase impacts, these are assessed in Section 10.4.3.1.1 for community amenity and in Section 10.4.3.2.1 for commercial amenity.

With respect to property values, Chapter 10 (Population) Appendix A10.2 (Economic Impact of Core Bus Corridors) in Volume 4 Part 3 of the EIAR assesses the potential economic impact of the Core Bus Corridors, which includes consideration of the impact on property value. In Section 3 of the report, and specifically the section on 'The impact on property values', the conclusion states that:

'*The public realm improvements planned by the NTA may lead to an increase in value of both residential and retail property prices, especially in the community centres along the corridors. Evidence shows that investing in public realm creates nicer places that are more desirable for people and business to locate in, thereby increasing the value of properties in the area. The evidence suggests that all public realm improvements generate value, regardless of the size of the investment or the neighbourhood. Residents along the corridors will also see a measurable increase in their quality of life, with evidence showing that residents are willing to pay more for an improved public realm*.'

vi) Disruption during the construction stage has not been addressed properly.

The potential Construction Phase impacts have been assessed throughout the EIAR, with mitigation measures proposed where required. A description of the Construction Phase is described in Chapter 5 (Construction) in Volume 2 of the EIAR. This includes description of construction duration, working hours, construction compounds and management of construction. The appendix to the Chapter, Appendix A5.1 (Construction Environmental Management Plan) in Volume 4 Part 1 of the EIAR, provides a description of the measures to be taken and commitments to be made by the appointed contractor during construction to ensure disruption and impact is minimised as far as reasonably practicable, including Table 5.2 which collates all Construction Phase mitigation measures as identified within the EIAR.

In addition to Chapter 5 (Construction), potential Construction Phase impacts are assessed for each topic within Volume 2 of the EIAR, and mitigation measures proposed where required. Specifically with respect to disruption, the most relevant chapter sections would be:

- Chapter 6 (Traffic & Transport), Section 6.4.5 (Construction Phase impact assessment) and Section 6.5.1 (Construction Phase mitigation);
- Chapter 7 (Air Quality), Section 7.4.2 (Construction Phase impact assessment) and Section 7.5.1 (Construction Phase mitigation);
- Chapter 9 (Noise & Vibration), Section 9.4.3 (Construction Phase impact assessment) and Section 9.5.1 (Construction Phase mitigation);
- Chapter 10 (Population), Section 10.4.3 (Construction Phase impact assessment) and Section 10.5 (Mitigation and Monitoring Measures);
- Chapter 11 (Human Health), Section 11.4.3 (Construction Phase impact assessment) and Section 11.5.1 (Construction Phase mitigation);
- Chapter 17 (Landscape (Townscape) & Visual), Section 17.4.3 (Construction Phase impact assessment) and Section 17.5.1 (Construction Phase mitigation);
- Chapter 18 (Waste & Resources), Section 18.5.3 (Construction Phase impact assessment) and Section 18.6.1 (Construction Phase mitigation); and
- Chapter 19 (Material Assets), Section 19.4.3 (Construction Phase impact assessment) and Section 19.5.1 (Construction Phase mitigation).

In addition to the individual Mitigation and Monitoring Measures section of each chapter, Chapter 22 (Summary of Mitigation and Monitoring Measures) in Volume 2 of the EIAR collates all of those mitigation measures included throughout the EIAR into one chapter.

vii) Potential impact of the disruption as a result of temporary acquisition of lands has not been addressed properly.

Chapter 5 (Construction) in Volume 2 of the EIAR gives a description of the Construction Phase of the Proposed Scheme, including with respect to temporary land acquisition. Specifically Section 5.5.2.1 states the following:

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

Any lands acquired temporarily to facilitate construction work will be returned to landowners on completion of the works. Existing boundary walls or fencing being relocated will be constructed to match the existing conditions, unless otherwise agreed. The removal of trees, vegetation, lawns, paving etc. will be minimised in so far as practicable.'

It goes on to state in Section 5.5.3.2 that:

'*The duration of the works will vary from property to property, but access and egress will be maintained at all times*.'

Chapter 10 (Population) in Volume 2 of the EIAR assesses the Construction Phase impacts associated with temporary land acquisition on both community (including residential) and commercial property in Sections 10.4.3.1.2.1 and 10.4.3.2.2.1 respectively. Chapter 17 (Landscape (Townscape) & Visual) in Volume 2 of the EIAR assesses the Construction Phase impacts associated with temporary land acquisition for all impacted properties in Section 17.4.3.2.8.

viii) Potential impact of the proposed in terms of long-term impact to climate change has not been properly or adequately assessed.

Chapter 8 (Climate) in Volume 2 of the EIAR assesses the climate impact of the Construction and Operational Phases of the Proposed Scheme. The methodology for undertaking the climate assessment is described in Section 8.3, with the assessment looking at both the impact of the project on the climate and the vulnerability of the project to climate change as per the guidance from Highways England's (2021) Design Manual for Roads and Bridges (DMRB) LA 114 Climate.

The assessment included both the direct Operational Phase carbon emissions from the Proposed Scheme (Section 8.5.2.4), as well as the indirect Operational Phase carbon emissions (Section 8.5.2.5). The assessment concludes that:

'*The Proposed Scheme has the potential to reduce CO_{2e} emissions equivalent to the removal of approximately 21,130 and 22,150 car trips per weekday from the road network in 2028 and 2043 respectively*.'

In addition to the climate assessment, Chapter 13 (Water) Appendix A13.2 (Flood Risk Assessment) in Volume 4 Part 3 of the EIAR describes the Flood Risk Assessment (FRA) undertaken for the Proposed Scheme. This FRA includes an assessment of the flood risk due to climate change (Section 5.6) which considers mean sea level rise, river flows, and extreme rainfall depths.

In addition to the FRA undertaken, Chapter 4 (Proposed Scheme Description) in Volume 2 of the EIAR describes the drainage design for the Proposed Scheme (Section 4.6.15), while the Proposed Surface Water Drainage Works figure in Volume 3 of the EIAR shows the design in more detail. In order to ensure that the increase in impermeable area from the Proposed Scheme does not increase the potential for flooding into the future as a result of climate change, Sustainable Drainage Systems (SuDS) have been included in the Drainage Design and:

'*All drainage structures for newly paved areas are designed with a minimum return period of no flooding in 1:30 years with a 20% climate change allowance*.'

ix) The proposed development will result in a negative visual impact for residential property owners and road users.

Chapter 17 (Landscape (Streetscape) & Visual) in Volume 2 of the EIAR describes the results of the assessment undertaken with respect to visual impact as a result of the Proposed Scheme. The Chapter assesses streetscape characteristics and visual impacts under a number of headings (i.e. Architectural Conservation Areas, Conservation Areas, Residential Conservation Areas, Protected Structures, Amenity Designations, Tree Preservation Orders / Tree Protection Objectives, Preserved Views / Scenic Views, Properties, and Trees and Vegetation) for the Construction Phase (Section 17.4.3.2, with the potential impacts summarised in Table 17.7) and Operational Phase one year post-construction (Section 17.4.4.2 with the potential impacts summarised in Table 17.8), while Section 17.5.2 assesses the Operational Phase visual impacts at 15 years post-construction.

The Chapter conclusion (Section 17.7) states that:

'*the Proposed Scheme will give rise to some degree of townscape and visual effect, most notably during the Construction Phase. These impacts arise especially where there is temporary and/or permanent acquisition of lands associated with residential or other properties including amenities, and where tree removal is required. The Proposed Scheme includes for replacement of disturbed boundaries, reinstatement of the Construction Compound, return of temporary acquisition areas, and for additional tree and other planting where possible along the Proposed Scheme.*

In the Operational Phase, localised negative residual effects will remain for properties experiencing permanent land acquisition, including the Thatch Cottage at Collinstown (a protected structure). There will be a negative residual effect remaining for the River Tolka Conservation Area resulting from the introduction of a new bridge structure within the designation. There will be overall positive effects for sections of the Proposed Scheme between Northwood Avenue and Granby Row, including Residential Conservation Areas, as the Proposed Scheme provides for improvements in the urban realm, which will provide positive long-term effects for the townscape and visual character. The Proposed Scheme will also provide for a significantly enhanced level of service for public transport and for pedestrian/cycle connectivity.'

Figure 17.2 (Photomontages) in Volume 3 of the EIAR show what the streetscape will look like once the Proposed Scheme is operational at a number of representative locations along the whole route. This includes a number of viewpoints along the Swords Road, and in particular View 21, see Figure 2.8, which shows the objectors property. Chapter 17 (Landscape (Townscape) & Visual) Section 17.5.2.1 describes the proposed changes to the streetscape at each photomontage location and states what the effect on visual amenity is at that location. In the case of View 21, the Chapter states that:

'*There would be no appreciable change to the character but there would be a minor positive change to the visual amenity of the view due to removal of the overhead services and provision of new boundaries*.'

Figure 2.8 'View 21' Proposed New Layout at Swords Road

x) The Proposed Scheme will result in increased traffic congestion and operational problems on the road networks, the impact has not been properly or adequately assessed.

Chapter 6 (Traffic & Transport) in Volume 2 of the EIAR and its Appendix A6.1 (Transport Impact Assessment) in Volume 4 Part 2 of the EIAR provide the impact assessment for traffic and transport for both the Construction and Operational Phases of the Proposed Scheme. The methodology for undertaking the assessments are described in Section 6.2 of Chapter 6 and Section 4 of Appendix A6.1.

The Construction Phase impact assessment is described in Section 6.4.5 of Chapter 6 and Section 6.5 of Appendix A6.1. As summarised in Chapter 6, Section 6.4.5.5 (Table 6.22) the predicted impact on general traffic during the Construction Phase as a result of '*Restrictions to general traffic along Proposed Scheme*' is Negative, Moderate and Temporary, while the predicted impact as a result of '*Additional construction traffic flows upon surrounding road network*' is Negative, Slight and Temporary. Section 6.5.1 describes the Construction Phase mitigation measures.

The Operational Phase impact assessment is described in Section 6.4.6 of Chapter 6 and Section 6.6 of Appendix A6.1. As summarised in Chapter 6, Section 6.4.6.3 (Table 6.81) the predicted impact on general traffic as a result of '*Reduction in general traffic flows along the Proposed Scheme*' is Positive, Moderate and Long-Term, while the predicted impact as a result of '*Redistributed general traffic along the surrounding road network in the indirect study area as a result of the reduction of reserve capacity along the Proposed Scheme*' is Negative, Slight and Long-Term.

CPO-19 – Lesley Henderson

Summary of Objections Raised

The objection to the CPO challenges the following:

i) Relevant statutory functions and powers of the NTA.

ii) Questions the purposes for which the CPO has been made.

iii) Assertions in relation to Constitutional Rights.

iv) Effects on the environment of the proposed development.

v) The potential impact of the presence and operation of the development in terms of health, security, general amenity and property values.

vi) Disruption during the construction stage has not been addressed properly.

vii) Potential impact of the disruption as a result of temporary acquisition of lands has not been addressed properly.

viii) Potential impact of the proposed in terms of long-term impact to climate change has not been properly or adequately assessed.

ix) The proposed development will result in a negative visual impact for residential property owners and road users.

x) The Proposed Scheme will result in increased traffic congestion and operational problems on the road networks, the impact has not been properly or adequately assessed.

Response to Objections Raised

i) Relevant statutory functions and powers of the NTA

This objection raises a number of queries in relation to the functions and powers of the NTA, and the statutory bases on which the NTA has made the CPO. It is clear from the CPO itself and indeed on the statutory notice served herein that the lands are being acquired for the purposes of the Swords to City Centre Core Bus Corridor Scheme to facilitate public transport and indeed such issues have been comprehensively addressed in Chapter 1 Introduction of Volume 2 of the EIAR, they are also explained below in response to this objection.

It is a function of the NTA under section 44(1)(a) of the Dublin Transport Authority Act 2008 (as amended) (the "**2008 Act**") to "*secure the provision of, or to provide, public transport infrastructure*", which includes the provision of the Swords to City Centre Core Bus Corridor Scheme. [2]

In that regard, and as set out in Section 1.4 of Chapter 1 of the EIAR, the NTA has decided in accordance with Section 44(2)(b) of the 2008 Act that the functions in relation to securing the provision of public transport infrastructure should be performed by the NTA.

Section 44(6) of the 2008 Act goes on to provide as follows in relation to the exercise of these functions by the NTA:-

"(6) Where—

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

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

the following provisions have effect—

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

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

(iii) the provisions of any enactment concerned (other than section 178 of the Act of 2000) apply in relation to the performance of the function subject to such modifications as may be necessary and as if the Authority was named in such enactment in each place where a public transport authority body entitled to exercise the function is named, …"

[2] *"public transport infrastructure" is defined in section 2 of the 2008 Act as "infrastructure constructed or provided, or proposed to be constructed or provided, in connection with the provision of public passenger transport services, which includes but is not limited to railway infrastructure, metro railway infrastructure, light railway infrastructure, bus infrastructure, rolling stock, buses, busways, bus lanes, bus garages, cycleways, cycle and pedestrian facilities, interchange facilities or such other class of infrastructure, facility, building or vehicle, whether of the same kind as the aforementioned or not, which the Authority has prescribed to be public transport infrastructure under section 44(13)"*

Therefore, under section 44(6) of the 2008 Act, the NTA is empowered to acquire lands by agreement or by means of a compulsory purchase order in accordance with Part XIV of the Planning and Development Act 2000 (as amended) (the "**2000 Act**"), for the purposes of performing its function of providing public transport infrastructure (and in this instance providing the Swords to City Centre Core Bus Corridor Scheme), and such compulsory purchase order may, by virtue of section 10(4)(d) of the Local Government (No. 2) Act 1960 (as amended), authorise the NTA to extinguish a public right of way.

Section 44(7) of the 2008 Act goes on to provide that the 2000 Act applies to a compulsory acquisition of land under, for example, section 44(6) of the 2008 Act, as if it were an acquisition under Part XIV of the 2000 Act and for that purpose a reference to a local authority shall be read as a reference to the NTA.

Section 213 of the 2000 Act is contained in Part XIV of the 2000 Act and is referenced on the face of the CPO for the Proposed Scheme. Section 213(1) of the 2000 Act provides that "*the power conferred on a local authority* [to be read as the NTA by virtue of section 44 of the 2008 Act] *shall be construed in accordance with this section".*

Section 213(2) of the 2000 Act states:-

> "*A local authority* [to be read as the NTA by virtue of section 44 of the 2008 Act] *may, for the purposes of performing any of its functions (whether conferred by or under this Act, or any other enactment passed before or after the passing of this Act),… do all or any of the following:-*
>
> *(i) acquire land, permanently or temporarily, by agreement or compulsorily,*
>
> *(ii) acquire, permanently or temporarily, by agreement or compulsorily, any easement, way-leave, water-right or other right over or in respect of any land or water or any substratum of land,*
>
> *(iii) restrict or otherwise interfere with, permanently or temporarily, by agreement or compulsorily, any easement, way-leave, water-right or other right over or in respect of any land or water or any substratum of land, and the performance of all or any of the functions referred to in subparagraphs (i), (ii) and (iii) are referred to in this Act as an "acquisition of land".*

Section 213(4) of the 2000 Act states:-

> *"a local authority may be authorised by compulsory purchase order to acquire land for any of the purposes referred to in subsection (2) of this section and section 10 (as amended by section 86 of the Housing Act, 1966) of the Local Government (No. 2) Act, 1960, shall be construed so as to apply accordingly and the references to "purposes" in section 10 (1)(a) of that Act shall be construed as including purposes referred to in subsection (2) of this section".*

Having regard to the provisions of section 213 of the 2000 Act, reference is therefore correctly made on the face of the CPO for the Proposed Scheme to "*Section 10 of the Local Government (No. 2) Act, 1960 as substituted by Section 86 of the Housing Act, 1966 as amended by Section 6 and the Second Schedule of the Roads Act, 1993*".

Further, section 10 of the Local Government (No. 2) Act, 1960 (the "**1960 Act**") operates, for example, to apply the provisions of section 76 of the Housing Act 1966 (the "**1966 Act**"), and the Third Schedule thereto. Therefore, reference is correctly made on the face of the CPO for the Proposed Scheme to section 76 of the 1966 Act and the Third Schedule thereto, and the processes and procedures set out in section 76 of the 1966 Act and the Third Schedule to the 1966 Act have, accordingly, been followed by the NTA in submitting the CPO for the Proposed Scheme to An Bord Pleanála (the "**Board**") for confirmation. Indeed, the statutory notice which was served on the objector is that required by Article 4(b) of the Third Schedule to the 1966 Act.

Finally, reference is also correctly made on the face of the CPO for the Proposed Scheme to section 184 of the Local Government Act 2001 (as amended) (the "**2001 Act**"), given that section 184 of the 2001 Act clarifies the rights referenced in section 213(2)(a) of the 2000 Act (referenced above), as including any easement, way-leave, water right or other right to which section 213(2)(a) applies

granted by or held from the local authority acquiring the land [the reference to local authority here should, by virtue of section 44 of the 2008 Act, be read as a reference to the NTA].

Therefore, there is no question but that the NTA has relied on the correct statutory bases in making the CPO for the Proposed Scheme, and has followed the correct processes and procedures as set out in the appropriate legislative framework in submitting the CPO for the Proposed Scheme to the Board for confirmation.

ii) Purposes for which the CPO has been made

This objection also raises queries in relation to the purposes for which the NTA has made the CPO. As set out in paragraph 2 of the statutory notice which was served upon the objector, the CPO is '*for the purposes of the construction of the Swords to City Centre Core Bus Corridor Scheme together with all ancillary and consequential works associated therewith for the purposes of facilitating public transport*'. Further, the face of the CPO itself also indicates that it is '*for the purposes of facilitating public transport*'.

Further, as set out in paragraph 10 of that notice, the EIAR which was prepared in respect of the Swords to City Centre Core Bus Corridor Scheme was available for inspection physically and on the NTA's dedicated website for this Proposed Scheme, and that EIAR contains all of the '*precise details of the proposed construction works*' and all of the '*proposed ancillary and consequential works for the Swords to City Centre Core Bus Corridor Scheme*' as requested in paragraphs 9 and 10 of this objection (CPO-16).

The lands at plot numbers 1133(1).1d and 1133(2).2d are proposed to be compulsorily acquired for the specific purposes of widening of the existing road corridor to facilitate a bus lane in each direction. As a result, the existing boundary wall of 298 Swords Road will be set back from its original position. The temporary land take is to facilitate the construction of this wall and to tie the driveway to any level differences with the Proposed Scheme as depicted in General Arrangement Drawing Sheet 20 of 37 of the EIAR Volume 3 Figures Chapter 4 Proposed Scheme Description, General Arrangement drawings and as detailed in Section 4.5.3.1 in Chapter 4 of Volume 2 of the EIAR.

Indeed, as the Board is aware, the NTA has also made an application to the Board under section 51 of the Roads Act 1993 (as amended) for approval of the proposed road development, the Swords to City Centre Core Bus Corridor Scheme, which is currently pending before the Board (ABP-Ref No. HA06D.317121).

iii) Assertions in relation to Constitutional Rights

This objection makes a number of assertions that the NTA has acted in breach of the objectors constitutional rights, has acted *ultra vires*, and has '*failed to act in accordance with the principles of basic fairness of procedures and natural/constitutional justice*' in making this CPO and in serving this statutory notice on the objector.

In addition to the lawfulness of the proposed compulsory acquisitions (as coming within the powers of the NTA as outlined above), the acquisitions are proportionate. In this latter regard, the courts have established that the power conferred to compulsorily acquire land must be exercised in accordance with the requirements of the constitution, including respecting the property rights of the affected landowner. The confirming authority (being the Board) must be satisfied that the acquisition of the property is clearly justified by the exigencies of the common good.

Accordingly, in applying the proportionality test, the NTA did (in making the Swords to City Centre Core Bus Corridor Compulsory Purchase Order 2023) and the Board should (in confirming the CPO) ensure that:

(i) there is a need that advances the common good which is to be met by the acquisition of the lands in question;

(ii) the particular property is suitable to meet that need;

(iii) any alternative methods of meeting the need have been considered; and

(iv) that the landowner is entitled to be compensated.

Chapter 2 of Volume 2 of the EIAR sets out how there is significant evidence to satisfy the requirement that there is a need that advances the common good. It is axiomatic that the acquisition of land and rights over land will result in interference with the use of those lands by owners/leases/occupiers. However, such interference is proportionate to the legitimate aim being pursued in the interests of the common good.

As detailed in Chapter 3 of Volume 2 of the EIAR, the NTA considered the reasonable alternatives to meet the need with the requirements of the EIA Directive which requires '*a description of the reasonable alternatives (for example in terms of project design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of environmental effects*'

In terms of alternative solutions, Chapter 3 of the EIAR sets out the reasonable alternative studies and the main reasons for the selection of the Proposed Scheme taking into account the effects on the environment. Within this Chapter consideration is given to strategic alternatives including both light rail and metro. Section 3.2.5 of this chapter states that the appropriate type of public transport provision in any particular case is predominately determined by the likely quantum of passenger demand along the particular public transport route.

'For urban transport systems, bus-based transport is the appropriate public transport mode for passenger demand levels of up to 4,000 passengers per hour per direction. (UITP 2009). Light rail provision would generally be appropriate to cater for passenger demand of between 3,500 and about 7,000 passengers per hour per direction. Passenger demand levels above 7,000 passengers per hour per direction would generally be catered for by heavy rail or metro modes, which would usually be expected to serve a number of major origins or destinations along a Particular corridor. In the case of both the bus and light rail modes, higher levels of passenger demand than the above stated figures can be accommodated under specific conditions.

The development of the prior GDA Transport Strategy considered the likely public transport passenger demand levels across the region using the NTA's transport model and took into account the other studies referenced above, in addition to studies that had been carried out to investigate a potential light rail scheme within the area of this corridor. Likely passenger flows were identified to be within the capacity of bus transport, without reaching the quantum of passenger demand which would support the provision of a higher capacity rail solutions in addition to a Metrolink. Section 3.2.1 set out various studies undertaken for the prior GDA Transport Strategy. Arising from these studies and the specific assessment and transport modelling work undertaken for the prior Strategy, it was concluded that a bus-based transport system would be the proposed public transport solution in the corridor of the Proposed Scheme. The proposed transport solution would be supplemented by Metro, to provide more passenger capacity and enhanced interchange between the Luas Red and Green Line Services, proposed Metrolink Station at Fosterstown, Sligo/Maynooth Line Heavy Rail Services at Drumcondra Station and the Suburban Interchange between the Orbital and Radial Routes at Coolock Lane. It was considered that there would be insufficient demand to justify the provision of an additional light rail alternative beyond what is proposed above, particularly given the low to medium density nature of development in this corridor.

Similar to BRT, the light rail option would be worse for the environment in terms of construction impacts, including flora and fauna, heritage, air and noise, compared to the CBC proposal. Light rail requires continuous unbroken physical lane infrastructure to achieve high-priority. This would involve significantly more land take and potentially involve demolition of buildings at pinch-points. In the case of the CBC proposals, bus-priority can be achieved through short lengths at pinch-points by the use of signal controlled priority.

Given the consideration of light rail provision, and the level of likely public passenger use along this overall corridor assessed in the transport modelling work, the development of the prior GDA Transport Strategy identified that a Metro solution would be economically justified within the area covered by this corridor. Therefore, it is intended to develop the light rail Metro system along this corridor through the implementation of MetroLink.

Arising from the various studies and analysis that had been carried out, and the specific assessment and transport modelling work undertaken for the prior GDA Transport Strategy, 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. This is

because 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'.

With respect to congestion charging, Section 3.2.8 of the EIAR states that a key success factor of demand management is greater use of alternative travel modes, in particular public transport. In the case of Dublin, the existing public transport system does not currently have sufficient capacity to cater for larger volumes of additional users.

'In advance of a significant uplift in overall public transport capacity in the Dublin metropolitan area, the implementation of major demand management measures across that area would be unsuccessful. Effectively constraining people from making journeys by car and requiring them to use other modes, without those modes having the necessary capacity to cater for such transfer, would not deliver an effective overall transport system. Instead, the capacity of the public transport system needs to be built up in advance of, or in conjunction with, the introduction of major demand management measures in the Dublin metropolitan area. This is especially true in the case of the bus system where a major increase in bus capacity through measures such as the Proposed Scheme would be required for the successful implementation of large scale demand management initiatives.

While the foregoing addresses the dependency of demand management measures on public transport capacity, it is equally correct that the provision of greatly enhanced cycling facilities will also be required to cater for the anticipated increase in cycling numbers, both in the absence of demand management measures and, even more so, with the implementation of such measures. Demand management initiatives by themselves will not deliver the level of segregated cycling infrastructure required to support the growth in that mode. Consequently, the progression of demand management proposals will not secure the enhanced safe cycling infrastructure envisaged under the Proposed Scheme.

Finally it is noted that park and ride and cashless fares both form part of the broader BusConnects programme and may be implemented to complement improvements to the overall bus system, including the Proposed Scheme infrastructure'.

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on each landowner whose land is being acquired. Following service of the Notice to Treat, each landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage their own agent / valuer in preparing, negotiating, and advising on compensation.

In light of all of the above, the NTA is satisfied that it has not acted *ultra vires* or in abuse of its powers, and that the making of the CPO is reasonable and justified and does not represent a disproportionate interference with the objector's constitutionally protected property rights.

iv) Effects on the environment of the proposed development such as noise, traffic volumes, increase in private transport causing harmful emissions and health hazards with living in close proximity to the proposed development.

<u>With respect to construction activities leading to 'considerable increased traffic volumes and noise', these potential impacts have been assessed within the EIAR.</u>

Chapter 6 (Traffic & Transport) in Volume 2 of the EIAR and its Appendix A6.1 (Transport Impact Assessment) in Volume 4 Part 2 of the EIAR provide the impact assessment for traffic and transport for both the Construction and Operational Phases of the Proposed Scheme. The methodology for undertaking the assessments are described in Section 6.2 of Chapter 6 and Section 4 of Appendix A6.1.

The Construction Phase impact assessment is described in Section 6.4.5 of Chapter 6 and Section 6.5 of Appendix A6.1. As summarised in Chapter 6, Section 6.4.5.5 (Table 6.22) the predicted impact on general traffic during the Construction Phase as a result of '*Restrictions to general traffic along Proposed Scheme*' is Negative, Moderate and Temporary, while the predicted impact as a result of '*Additional construction traffic flows upon surrounding road network*' is Negative, Slight and Temporary. Mitigation measures to manage traffic impacts as a result of construction as described in Section 6.4.5.4.6.1 and 6.4.5.4.6.2 of Chapter 6 respectively will include:

- '*The appointed contractor will develop a CTMP that gives due consideration to provision of local access requirements and designates appropriate diversion routes in the case where localised temporary closures are required*'; and

- '*The appointed contractor will prepare a Construction Stage Mobility Management Plan (CSMMP) which will be developed prior to construction, as described in Appendix A5.1 CEMP in Volume 4 of this EIAR, to actively discourage personnel from using private vehicles to travel to site. The CSMMP will promote the use of public transport, cycling and walking by personnel. Private parking at the Construction Compound will be limited. Vehicle sharing will be encouraged, subject to public health guidelines, where travel by private vehicle is a necessity, e.g. for transporting heavy equipment*'.

Chapter 9 (Noise & Vibration) in Volume 2 of the EIAR provides an assessment of the potential noise impacts as a result of the Construction and Operational Phases of the Proposed Scheme. Section 9.4.3 provides the impact assessment for the Construction Phase, with Section 9.4.3.4.1 and Table 9.44 providing the summary of the potential construction noise impacts. The potential impact significance of construction traffic noise along the Proposed Scheme is illustrated in Figure 9.2 in Volume 3 of the EIAR, with the impact significance for the Swords Road in the vicinity of the 298 Swords Road categorised as Slight – Moderate (Sheet 3-4 of 5). Chapter 9 lays out the mitigation measures for the management of noise during the Construction Phase in Section 9.5.1, with all mitigation measures also recorded in Appendix A5.1 (Construction Environmental Management Plan (CEMP)) in Volume 4 Part 1 of the EIAR. Construction Phase mitigation measures as listed in Table 5.2 of the CEMP will include:

- NV2*: 'The appointed contractor will put in place the most appropriate noise control measures depending on the level of noise reduction required at individual working areas i.e., based on the construction threshold values for noise and vibration set out in Tables 9.7 and 9.10 in Chapter 9 (Noise & Vibration) of this EIAR. Reference to Table 9.37 in Chapter 9 (Noise & Vibration) of this EIAR indicates that intrusive works occurring within 25m to 45m of Noise Sensitive Locations (NSLs) will need specific noise control measures to reduce impacts depending on the time period over which they will occur, i.e., daytime or evening'*;

- NV8: *'Construction activities will be scheduled in a manner that reflects the location of the site and the nature of neighbouring properties. Construction activities / plant or equipment items will be considered with respect to their potential to exceed construction noise thresholds at NSLs and will be scheduled according to their noise level, proximity to sensitive locations and possible options for noise control. In situations where an activity with potential for exceedance of construction noise thresholds is scheduled (e.g., road widening and utility diversions or activities with similar noise levels identified in Table 9.22 in Chapter 9 (Noise & Vibration) of this EIAR). Other construction activities associated with the Proposed Scheme will be scheduled to avoid significant cumulative noise levels'*;

- NV9: *'The NTA will establish clear forms of communication that will involve the appointed contractor and NSLs in proximity to the works so that residents or building occupants are aware of the likely duration of activities likely to generate noise or vibration that are potentially significant as set out in Table 9.7 and Table 9.10 in Chapter 9 of this EIAR'*; and

- NV10: *'During the Construction Phase the appointed contractor will carry out noise monitoring at representative NSLs to evaluate and inform the requirement and / or implementation of noise management measures. Noise monitoring will be conducted in accordance with International Organization for Standardization (ISO) 1996–1 (ISO 2016) and ISO 1996–2 (ISO 2017). The selection of monitoring locations will be based on the nearest representative NSLs to the working area which will progress along the length of the Proposed Scheme'.*

With respect to the observations that 'Private transport in the area will increase and take significantly longer to pass through the area causing extra harmful emissions and hazard', this has been assessed within the EIAR.

Chapter 6 (Traffic & Transport) in Volume 2 of the EIAR provides an assessment of the impact the Proposed Scheme will have on traffic volumes once operational, both directly along the route of the Proposed Scheme, and on the surrounding road network. As described in Section 6.4.6.2.8 of Chapter 6, traffic modelling was carried out to assess the predicted traffic volumes in 2028 once the Proposed Scheme is fully operational, in both the AM and PM peak hours compared to the predicted traffic in the absence of the Proposed Scheme (the Do Minimum scenario). With respect to the Swords Road in the vicinity of this property, the results of the modelling showed a decrease in general traffic during both the AM peak of 807 Passenger Car Units (Table 6.67 in Chapter 6), and the PM peak of 548 Passenger Car Units (Table 6.71 in Chapter 6).

With respect to harmful emissions, Chapter 7 (Air Quality) in Volume 2 of the EIAR describes the assessment of the potential impacts of the Proposed Scheme on air quality during the Construction and Operational Phases. Figures 7.3 to 7.5 show the modelled annual mean impacts to NO_2, PM_{10} and $PM_{2.5}$ respectively at receptors along the Proposed Scheme once the Proposed Scheme is operational, with the area in which 298 Swords Road is located shown on Sheet 2 of each of those figures. Along that stretch of the Swords Road, Figure 7.3 shows a Negligible to Moderate Beneficial change to NO_2, Figure 7.4 shows a Negligible change to PM_{10}, and Figure 7.5 shows a Negligible change to $PM_{2.5}$.

With respect to the observations that 'The health effects associated with living in close proximity to the proposed development have not been adequately or properly assessed', this has been assessed within the EIAR.

Chapter 11 (Human Health) of Volume 2 of the EIAR provides an assessment of the potential human health impact of the Proposed Scheme during both the Construction Phase (Section 11.4.3) and the Operational Phase (Section 11.4.4). Section 11.1 (Introduction) states that '*This assessment has been carried out according to best practice and guidelines relating to human health, and in the context of similar large-scale transport infrastructural projects*', with the Chapter going on to state in Section 11.2.4.2 that:

'*The characteristics of the Proposed Scheme have been considered and the potential pathways between aspects of the construction and operation of the Proposed Scheme and health outcomes (beneficial and adverse) have been mapped out... Due to the nature of impacts on human health, many of these are indirect. The assessment of the Operational Phase of the Proposed Scheme has focused on those potential impacts most likely to be influenced by the Proposed Scheme, namely air quality, noise, community severance, social use of outdoor space, physical activity levels, access and risk of injuries. For the identification of construction impacts, reference has been made to the other environmental topic assessments to identify the aspects of the environment likely to be affected, and then a further consideration has been made as to whether there is a likely pathway between those impacts and human health outcomes.*'

The Construction Phase health impacts are summarised in Section 11.4.3.7 (Table 11.6), while the Operational Phase health impacts are summarised in Section 11.4.4.9 (Table 11.7). A description of the mitigation and monitoring measures proposed during both the Construction and Operational Phases are described in Section 11.5 of the Chapter.

Section 11.6 describes the predicted residual impacts after mitigation measures have been incorporated. With respect to Construction Phase residual impacts the Chapter states:

'*No significant residual impacts on health are predicted.*'

With respect to Operational Phase residual impacts the Chapter states:

'*Three issues were assessed as likely to be associated with significant residual impacts on human health, all of which were considered positive.*

Lack of regular physical activity is a leading cause of chronic disease and premature deaths. The Proposed Scheme will improve opportunities and convenience for walking and cycling, which will support many people in the study area in achieving recommended levels of weekly physical activity, for example as part of an active travel commute to work or education. It will also increase safety and the perception of safety for pedestrians and cyclists, who are more vulnerable to injury and mortality from traffic collisions. Furthermore, by redressing the balance between private car use and other forms of transport, the Proposed Scheme will improve public transport journey times and

reliability, as well as introducing greatly improved active travel infrastructure. This will provide for a more equitable transport experience, including for those without access to a car.

The Proposed Scheme is expected to have a significantly positive contribution on health outcomes related to increased physical activity, equitable access to services and improved safety for vulnerable road users.

The significant positive impacts which are expected to arise in the Operational Phase fully align with the relevant objectives of the Proposed Scheme'.

v) The potential impact of the presence and operation of the development in terms of health, security, general amenity and property values.

With respect to potential health impact, Chapter 11 (Human Health) of Volume 2 of the EIAR provides an assessment of the potential impact of the Proposed Scheme during both the Construction Phase and the Operational Phase. In particular, Section 11.4.4 of the Chapter covers the potential health impacts of the Proposed Scheme once in place and fully operational. The Operational Phase health impacts are summarised in Section 11.4.4.9 (Table 11.7)

With respect to security, Appendix A10.2 (Economic Impact of Core Bus Corridors) in Volume 4 Part 3 of the EIAR assesses the potential economic impact of the Core Bus Corridors, which includes consideration of the impact on crime and anti-social activity. In Section 5 of the report, and specifically the section on '*The impact of transport infrastructure on crime'*, the conclusion states that:

'*The new infrastructure improvements should have a direct and immediate impact on crime along the corridors. It will provide better, safer and more visible bus stops whilst also improving the wider public realm infrastructure through investments such as improved street lighting. This will act as a direct deterrent to criminal activity and result in a reduction in crime. This in turn has been shown to encourage people onto the streets into the evening which will also support the night time economy in community centres*.'

With respect to general amenity, Chapter 17 (Landscape (Townscape) & Visual) in Volume 2 of the EIAR assesses the potential impacts during both the Construction and Operational Phases, including an assessment of the residual impacts at one year and 15 years post-construction. The assessment includes potential impacts on visual amenity and amenity designations along the Proposed Scheme. Chapter 10 (Population) in Volume 2 of the EIAR includes assessments of the potential impacts on both community amenity and commercial amenity, during both Construction and Operational Phases. With respect to the potential Operational Phase impacts, these are assessed in Section 10.4.3.1.1 for community amenity and in Section 10.4.3.2.1 for commercial amenity.

With respect to property values, Chapter 10 (Population) Appendix A10.2 (Economic Impact of Core Bus Corridors) in Volume 4 Part 3 of the EIAR assesses the potential economic impact of the Core Bus Corridors, which includes consideration of the impact on property value. In Section 3 of the report, and specifically the section on 'The impact on property values', the conclusion states that:

'*The public realm improvements planned by the NTA may lead to an increase in value of both residential and retail property prices, especially in the community centres along the corridors. Evidence shows that investing in public realm creates nicer places that are more desirable for people and business to locate in, thereby increasing the value of properties in the area. The evidence suggests that all public realm improvements generate value, regardless of the size of the investment or the neighbourhood. Residents along the corridors will also see a measurable increase in their quality of life, with evidence showing that residents are willing to pay more for an improved public realm*.'

vi) Disruption during the construction stage has not been addressed properly.

The potential Construction Phase impacts have been assessed throughout the EIAR, with mitigation measures proposed where required. A description of the Construction Phase is described in Chapter 5 (Construction) in Volume 2 of the EIAR. This includes description of construction duration, working hours, construction compounds and management of construction. The appendix to the Chapter, Appendix A5.1 (Construction Environmental Management Plan) in Volume 4 Part 1 of the EIAR, provides a description of the measures to be taken and commitments to be made by the appointed

contractor during construction to ensure disruption and impact is minimised as far as reasonably practicable, including Table 5.2 which collates all Construction Phase mitigation measures as identified within the EIAR.

In addition to Chapter 5 (Construction), potential Construction Phase impacts are assessed for each topic within Volume 2 of the EIAR, and mitigation measures proposed where required. Specifically with respect to disruption, the most relevant chapter sections would be:

- Chapter 6 (Traffic & Transport), Section 6.4.5 (Construction Phase impact assessment) and Section 6.5.1 (Construction Phase mitigation);
- Chapter 7 (Air Quality), Section 7.4.2 (Construction Phase impact assessment) and Section 7.5.1 (Construction Phase mitigation);
- Chapter 9 (Noise & Vibration), Section 9.4.3 (Construction Phase impact assessment) and Section 9.5.1 (Construction Phase mitigation);
- Chapter 10 (Population), Section 10.4.3 (Construction Phase impact assessment) and Section 10.5 (Mitigation and Monitoring Measures);
- Chapter 11 (Human Health), Section 11.4.3 (Construction Phase impact assessment) and Section 11.5.1 (Construction Phase mitigation);
- Chapter 17 (Landscape (Townscape) & Visual), Section 17.4.3 (Construction Phase impact assessment) and Section 17.5.1 (Construction Phase mitigation);
- Chapter 18 (Waste & Resources), Section 18.5.3 (Construction Phase impact assessment) and Section 18.6.1 (Construction Phase mitigation); and
- Chapter 19 (Material Assets), Section 19.4.3 (Construction Phase impact assessment) and Section 19.5.1 (Construction Phase mitigation).

In addition to the individual Mitigation and Monitoring Measures section of each chapter, Chapter 22 (Summary of Mitigation and Monitoring Measures) in Volume 2 of the EIAR collates all of those mitigation measures included throughout the EIAR into one chapter.

vii) Potential impact of the disruption as a result of temporary acquisition of lands has not been addressed properly.

Chapter 5 (Construction) in Volume 2 of the EIAR gives a description of the Construction Phase of the Proposed Scheme, including with respect to temporary land acquisition. Specifically Section 5.5.2.1 states the following:

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

Any lands acquired temporarily to facilitate construction work will be returned to landowners on completion of the works. Existing boundary walls or fencing being relocated will be constructed to match the existing conditions, unless otherwise agreed. The removal of trees, vegetation, lawns, paving etc. will be minimised in so far as practicable.'

It goes on to state in Section 5.5.3.2 that:

'*The duration of the works will vary from property to property, but access and egress will be maintained at all times*.'

Chapter 10 (Population) in Volume 2 of the EIAR assesses the Construction Phase impacts associated with temporary land acquisition on both community (including residential) and commercial property in Sections 10.4.3.1.2.1 and 10.4.3.2.2.1 respectively. Chapter 17 (Landscape (Townscape) & Visual) in Volume 2 of the EIAR assesses the Construction Phase impacts associated with temporary land acquisition for all impacted properties in Section 17.4.3.2.8.

viii) Potential impact of the proposed in terms of long-term impact to climate change has not been properly or adequately assessed.

Chapter 8 (Climate) in Volume 2 of the EIAR assesses the climate impact of the Construction and Operational Phases of the Proposed Scheme. The methodology for undertaking the climate assessment is described in Section 8.3, with the assessment looking at both the impact of the project on the climate and the vulnerability of the project to climate change as per the guidance from Highways England's (2021) Design Manual for Roads and Bridges (DMRB) LA 114 Climate.

The assessment included both the direct Operational Phase carbon emissions from the Proposed Scheme (Section 8.5.2.4), as well as the indirect Operational Phase carbon emissions (Section 8.5.2.5).The assessment concludes that:

'*The Proposed Scheme has the potential to reduce CO_{2e} emissions equivalent to the removal of approximately 21,130 and 22,150 car trips per weekday from the road network in 2028 and 2043 respectively*.'

In addition to the climate assessment, Chapter 13 (Water) Appendix A13.2 (Flood Risk Assessment) in Volume 4 Part 3 of the EIAR describes the Flood Risk Assessment (FRA) undertaken for the Proposed Scheme. This FRA includes an assessment of the flood risk due to climate change (Section 5.6) which considers mean sea level rise, river flows, and extreme rainfall depths.

In addition to the FRA undertaken, Chapter 4 (Proposed Scheme Description) in Volume 2 of the EIAR describes the drainage design for the Proposed Scheme (Section 4.6.15), while the Proposed Surface Water Drainage Works figure in Volume 3 of the EIAR shows the design in more detail. In order to ensure that the increase in impermeable area from the Proposed Scheme does not increase the potential for flooding into the future as a result of climate change, Sustainable Drainage Systems (SuDS) have been included in the Drainage Design and:

'*All drainage structures for newly paved areas are designed with a minimum return period of no flooding in 1:30 years with a 20% climate change allowance*.'

ix) The proposed development will result in a negative visual impact for residential property owners and road users.

Chapter 17 (Landscape (Streetscape) & Visual) in Volume 2 of the EIAR describes the results of the assessment undertaken with respect to visual impact as a result of the Proposed Scheme. The Chapter assesses streetscape characteristics and visual impacts under a number of headings (i.e. Architectural Conservation Areas, Conservation Areas, Residential Conservation Areas, Protected Structures, Amenity Designations, Tree Preservation Orders / Tree Protection Objectives, Preserved Views / Scenic Views, Properties, and Trees and Vegetation) for the Construction Phase (Section 17.4.3.2, with the potential impacts summarised in Table 17.7) and Operational Phase one year post-construction (Section 17.4.4.2 with the potential impacts summarised in Table 17.8), while Section 17.5.2 assesses the Operational Phase visual impacts at 15 years post-construction.

The Chapter conclusion (Section 17.7) states that:

'*the Proposed Scheme will give rise to some degree of townscape and visual effect, most notably during the Construction Phase. These impacts arise especially where there is temporary and/or permanent acquisition of lands associated with residential or other properties including amenities, and where tree removal is required. The Proposed Scheme includes for replacement of disturbed boundaries, reinstatement of the Construction Compound, return of temporary acquisition areas, and for additional tree and other planting where possible along the Proposed Scheme.*

In the Operational Phase, localised negative residual effects will remain for properties experiencing permanent land acquisition, including the Thatch Cottage at Collinstown (a protected structure). There will be a negative residual effect remaining for the River Tolka Conservation Area resulting from the introduction of a new bridge structure within the designation. There will be overall positive effects for sections of the Proposed Scheme between Northwood Avenue and Granby Row, including Residential Conservation Areas, as the Proposed Scheme provides for improvements in the urban realm, which will provide positive long-term effects for the townscape and visual character. The Proposed Scheme will also provide for a significantly enhanced level of service for public transport and for pedestrian/cycle connectivity.'

Figure 17.2 (Photomontages) in Volume 3 of the EIAR show what the streetscape will look like once the Proposed Scheme is operational at a number of representative locations along the whole route. This includes a number of viewpoints along the Swords Road, and in particular View 21, see Figure

2.9, which shows the objectors property. Chapter 17 (Landscape (Townscape) & Visual) Section 17.5.2.1 describes the proposed changes to the streetscape at each photomontage location and states what the effect on visual amenity is at that location. In the case of View 21, the Chapter states that:

'*There would be no appreciable change to the character but there would be a minor positive change to the visual amenity of the view due to removal of the overhead services and provision of new boundaries*.'

Figure 2.9 'View 21' Proposed New Layout at Swords Road

x) The Proposed Scheme will result in increased traffic congestion and operational problems on the road networks, the impact has not been properly or adequately assessed.

Chapter 6 (Traffic & Transport) in Volume 2 of the EIAR and its Appendix A6.1 (Transport Impact Assessment) in Volume 4 Part 2 of the EIAR provide the impact assessment for traffic and transport for both the Construction and Operational Phases of the Proposed Scheme. The methodology for undertaking the assessments are described in Section 6.2 of Chapter 6 and Section 4 of Appendix A6.1.

The Construction Phase impact assessment is described in Section 6.4.5 of Chapter 6 and Section 6.5 of Appendix A6.1. As summarised in Chapter 6, Section 6.4.5.5 (Table 6.22) the predicted impact on general traffic during the Construction Phase as a result of 'Restrictions to general traffic along Proposed Scheme' is Negative, Moderate and Temporary, while the predicted impact as a result of 'Additional construction traffic flows upon surrounding road network' is Negative, Slight and Temporary. Section 6.5.1 describes the Construction Phase mitigation measures.

The Operational Phase impact assessment is described in Section 6.4.6 of Chapter 6 and Section 6.6 of Appendix A6.1. As summarised in Chapter 6, Section 6.4.6.3 (Table 6.81) the predicted impact on general traffic as a result of '*Reduction in general traffic flows along the Proposed Scheme*' is Positive, Moderate and Long-Term, while the predicted impact as a result of '*Redistributed general traffic along the surrounding road network in the indirect study area as a result of the reduction of reserve capacity along the Proposed Scheme*' is Negative, Slight and Long-Term.

2.3 Swords Road (Properties 268 and 270) – CPO-07 and CPO-21

2.3.1 Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor, it is proposed to provide a footpath, bus lane and general traffic lane in each direction. It is proposed to redirect cyclists through Lorcan Road and Shanrath Road as a Quiet Street.

The existing road cross section in this location provides a footpath on each side of the road with one general traffic lane and advisory cycle lane in each direction.

In order to achieve the required cross section of the Proposed Scheme land acquisition is necessary from private properties along this section of Swords Road.

The land take required is shown in the following:

- relevant extract of the EIAR Volume 3 Chapter 4 Proposed Scheme Description Figures, General Arrangement drawings in Figure 2.10.
- and the existing aerial view in Figure 2.11.

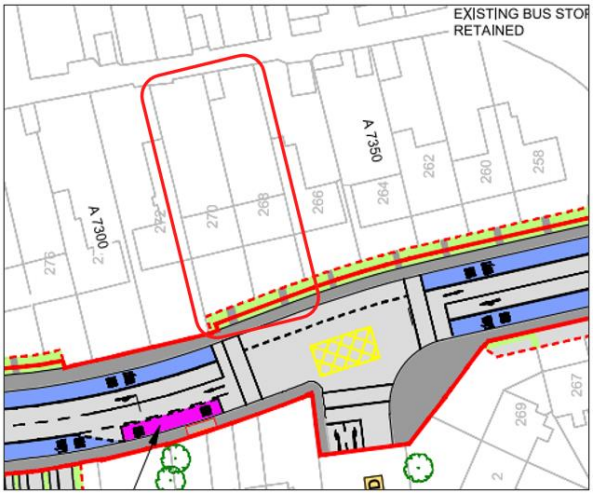

Figure 2.10 Proposed New Layout at Swords Road

Figure 2.11 Existing Aerial View on Swords Road

Objections CPO-07 and CPO-21, which relate to two separate CPO plots that are adjacent to each other, are responded to individually below.

CPO-07 – Daniela Sorahan

Summary of Objections Raised

The objection to the CPO raises six potential issues:

i) Architectural/Archaeological Heritage

The objection commented that to interfere in any part of this property would be a massive step backwards in relation to the protection of Dublin's heritage. The preservation of in situ archaeology and the protection of the setting and character of vernacular groups of buildings are well established heritage and planning principles that will be compromised by the proposals.

ii) Impact on Property Value

The objection raised concern that the reduction in the buffer (garden) to increase the width of the heavily trafficked road will undermine the amenity and the value of the dwellings and these amenity impacts will be compounded by the elevated ground floor level of the dwellings relative to the level of the road.

iii) Alternative Solutions

The objection commented that their client has no issue in relation to infrastructural obligations but does not believe that this is the best course of action for the common good and believes that there is a reasonable, suitable and viable alternative available, although the objection does not identify any such alternative.

iv) Construction Impacts

The objection raised concerns in relation to the damage that might be done to the properties due to the construction works to be carried out. There was further concern there will be an increase infestation of vermin due to the construction works. The response also commented the Scheme would cause a massive noise nuisance.

v) Information request (Policy)

The objection queried if it was possible to get sight of the 2022 review in accordance with number 15 of the 2008 Dublin Transport Act.

The objection raised concerns that the assessments have not adequately or properly detailed and established that the infrastructure cannot be accommodated within the existing road corridor and that given the disproportionate impact on the dwellings, the Board should request further information and revised plans from the applicant that accommodate the infrastructure within the existing road reservation and without the need to acquire a part of the gardens.

vi) Loss of Flora

The objection stated that a rich range and variety of flora that has matured over many years and because three unique cottages have been there for such a long time they have extreme sentimental value for their client and many other people living there because they have been tended to and planted by deceased relatives.

Response to Objections Raised

i) Architectural/Archaeological Heritage

Chapter 15 (Archaeological & Cultural Heritage) in Volume 2 of the EIAR considers the potential impact of the Proposed Scheme on archaeology and cultural heritage during both the Construction and Operational Phases. As shown in Figure 15.1 (Sheet 11) in Volume 3 of the EIAR, there are no monuments on the Record of Monuments and Places (RMP) or the Sites and Monuments Record (SMR) recorded at or within the vicinity of St. Canice’s Terrace. There is however a non-designated archaeological site marked on Shanowen Road in close proximity to the terrace, namely the site of

a former lodge associated with 'White House' (Reference Number CBC0002AH015). As described in Appendix A15.2 (Archaeological and Cultural Heritage Inventory) in Volume 4 Part 3 of the EIAR:

'*A lodge associated with 'White House' is depicted at this location on the 25-inch OS map of 1907. This structure had been demolished by the time of the last edition OS six-inch map of 1938. While there is no above ground trace, subsurface features may survive and be affected by any ground-breaking works at this location. The non-designated archaeological site has a low sensitivity value and the magnitude of impact is medium, resulting in a slight impact.*'

Section 15.5.1 of Chapter 15 describes the Construction Phase mitigation measures, including the following with respect to archaeological monitoring:

'*The appointed contractor will make provision for archaeological monitoring to be carried out under licence to the DHLGH* [Department of Housing, Local Government and Heritage] *and the NMI* [National Museum of Ireland]*, 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 be resolved to the satisfaction of the DHLGH and the NMI. The appointed contractor will ensure that the archaeologist will have the power to inspect all excavation to formation level for the proposed works and to temporarily halt the excavation work, if and as necessary, having conferred with the NTA. They will be given the power to ensure the temporary protection of any features of archaeological importance identified. The archaeologist will be afforded sufficient time and resources to record and remove any such features identified in accordance with the licensing requirements agreed.*'

Chapter 16 (Architectural Heritage) of Volume 2 of the EIAR assesses the impact of the Proposed Scheme on structures of Architectural Heritage interest as a result of both construction and operation within a 50m study area around the Proposed Scheme.

St. Canice's Terrace (258 to 280 Swords Road) has no official heritage designation, however it has been identified within the assessment in Chapter 16 under the heading of '*Other Structures of Built Heritage Interest*' and given the Reference Number CBC0002BTH018. The impact on it has therefore been included within the impact assessment. St Canice's Terrace is marked as a heritage feature in Figure 16.1 (Sheet 11) in Volume 3 of the EIAR, and is included in Appendix A16.2 (Inventory of Architectural Heritage Sites) in Volume 4 Part 3 of the EIAR (in Section 16.6).

Section 16.4.3.6 of Chapter 16 provides detail on the impact assessment on '*Other Structures of Built Heritage Interest*' during the Construction Phase, with St Canice's Terrace identified as one such structure which will be directly impacted by the Proposed Scheme, stating:

'At St Canice's Terrace, 258 to 280 Swords Road Whitehall, Dublin 9 (CBC0002BTH018), the existing cottages will be impacted by the proposed land-take at the front boundary onto Sword's Road. The original boundaries comprised of low retaining walls topped with simple iron or steel railings and steel pedestrian gates. They are in varied condition with many having had their original railings removed and their front walls raised, though most retain the original gates and piers. The houses are of Low sensitivity. The loss of the remaining fabric of the front boundary will have a Negative impact, the magnitude of which is Medium. The predicted Construction Phase impact will be Direct, Negative, Slight and Permanent.'

Appendix A16.3 (Methodology for Works Affecting Sensitive and Historic Fabric) in Volume 4 Part 3 of the EIAR outlines the requirements when working near or on historic fabric. Section 16.3 of Appendix A16.3 specifically describes the requirements for the recording, removal, storage and reconstruction of boundary treatments.

The NTA will prepare detailed accommodation works plans in consultation with impacted landowners upon confirmation of the CPO by An Bord Pleanála. Section 4.6.18.1 of Chapter 4 Proposed Scheme Description describes the approach for boundary treatment. To maintain the character and setting of the Proposed Scheme, the approach to undertaking the new boundary treatment works along the corridor is replacement on a 'like for like' basis in terms of material selection and general aesthetics.

ii) Impact on Property Value

With respect to property values, Chapter 10 (Population) Appendix A10.2 (Economic Impact of Core Bus Corridors) in Volume 4 Part 3 of the EIAR assesses the potential economic impact of the Core

Bus Corridors, which includes consideration of the impact on property value. In Section 3 of the report, and specifically the section on 'The impact on property values', the conclusion states that:

'*The public realm improvements planned by the NTA may lead to an increase in value of both residential and retail property prices, especially in the community centres along the corridors. Evidence shows that investing in public realm creates nicer places that are more desirable for people and business to locate in, thereby increasing the value of properties in the area. The evidence suggests that all public realm improvements generate value, regardless of the size of the investment or the neighbourhood. Residents along the corridors will also see a measurable increase in their quality of life, with evidence showing that residents are willing to pay more for an improved public realm*.'

Chapter 6 (Traffic & Transport) in Volume 2 of the EIAR provides an assessment of the impact the Proposed Scheme will have on traffic volumes once operational, both directly along the route of the Proposed Scheme, and on the surrounding road network. As described in Section 6.4.6.2.8 of Chapter 6, traffic modelling was carried out to assess the predicted traffic volumes in 2028 once the Proposed Scheme is fully operational, in both the AM and PM peak hours compared to the predicted traffic in the absence of the Proposed Scheme (the Do Minimum scenario). With respect to the Swords Road in the vicinity of this property, the results of the modelling showed a decrease in general traffic during both the AM peak of 807 Passenger Car Units (Table 6.67 in Chapter 6), and the PM peak of 548 Passenger Car Units (Table 6.71 in Chapter 6).

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation, which can include perceived loss in property value, and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage its agent / valuer in preparing, negotiating and advising on compensation.

iii) Alternative Solutions

The Emerging Preferred Route proposed a northbound one-way traffic system between the Omni Park Shopping Centre and the Shantalla Road junction, along with bus lanes in both directions, and a new slip road allowing southbound traffic onto the bypass to exit onto Shantalla at the N1/M50 bridge. As this section of the Swords Road is not wide enough to provide segregated cycle facilities, it was proposed to redirect cyclists through Coolock Lane and to an offline, two-way cycle track adjacent to Oak Park Avenue, running parallel to west of Santry Bypass (N1/M50) and connection at the Shanrath Junction. Following consultation feedback received from members of the public following the first non-statutory public consultations held from the 14th of November 2018 to the 29th of March 2019, it became apparent that the one-way proposal for general traffic might affect the existing access/egress arrangements for residents along the Lorcan and Shanrath Roads and impact on commercial deliveries and local business.

Section 3.4.1.1 of Chapter 3 of the EIAR set out that design development and assessment work was carried out at the Draft Preferred Route Option Stage on this section of the Proposed Scheme. This is also documented in Section 6.2.2.2 of the Preferred Route Option Report (provided as part of the Supplementary Information of the EIAR), looked at a one-way option through Santry Village, which was considered.

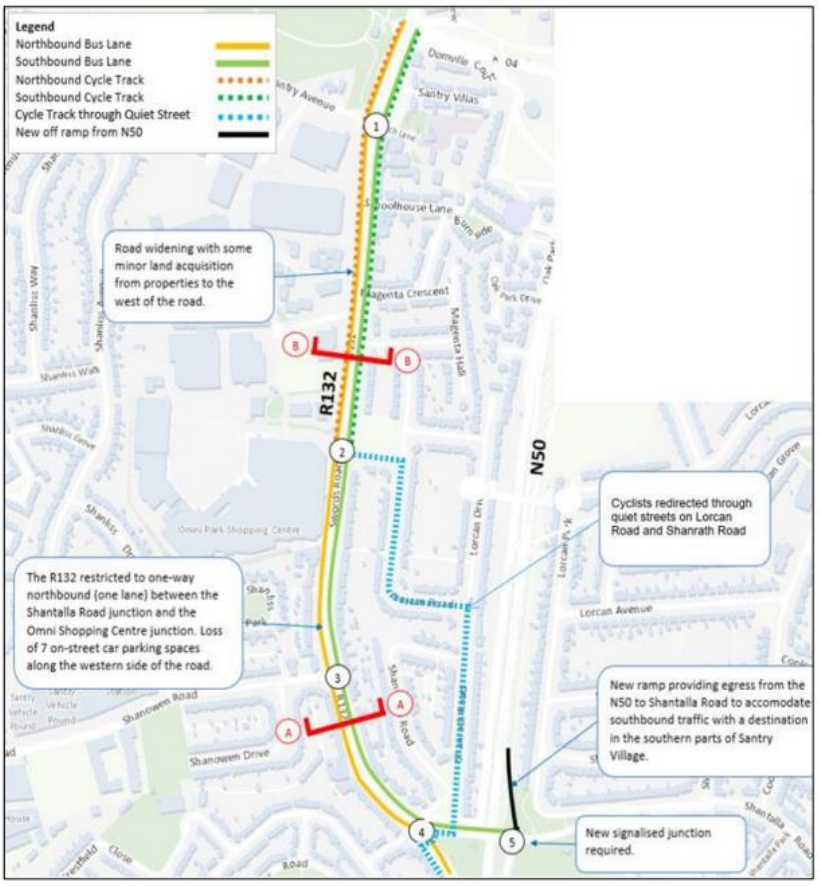

Figure 2.12 One-Way Route Option through Santry Village (Option SY1C)

This option removes southbound traffic between Omni Shopping Centre and Shantalla Road to minimise land acquisition on Swords Road for this section of the scheme. A bus lane would be provided in each direction but only one traffic lane (northbound) would be maintained for general traffic.

Combined with the proposal to redirect cyclists through Lorcan Road and Shanrath Road this option would negate the need for any land acquisition along this section of the scheme.

To allow access from the north to properties in the south of Santry Village, this option would require the construction of a new southbound slip road off the N50 at Shantalla Road. The new slip road would join the Shantalla Road via a new signalised junction.

A cross-section on Swords Road for this scheme option is illustrated in Figure 2.13.

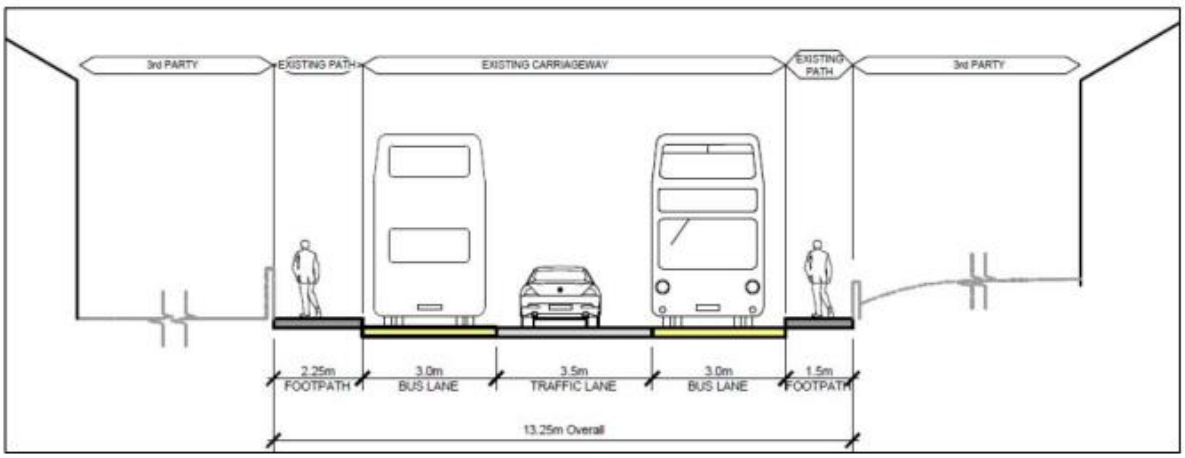

Figure 2.13 SY1C Cross-Section A-A Swords Road South of Omni Shopping Centre

The proposed traffic management changes would have a direct impact on traffic routes to, from and through the southern part of Santry Village.

The Stage 2 Route Options Assessment – Multi-Criteria Analysis table for this section is included in Appendix A of the Preferred Route Option Report.

A summary of the assessment and relative ranking of route options against the five main assessment criteria is presented in Table 2.3 below.

Table 2.2 Santry Village Final Summary of MCA

Assessment Criteria	Option 1 (SY1B) Two-Way Option	Option 2 (SY1C) One-Way Option
Economy		
Integration		
Accessibility and Social Inclusion		
Safety		
Environment		

Signal-controlled bus priority (similar to that adopted at Santry Demesne, see Section 6.2.1 of the Preferred Route Options Report) was also considered as an option through Santry Village, in order to reduce the impact on land take. For signal-controlled bus priority to operate successfully, queue lengths from the next junction cannot be allowed to develop on the shared bus/traffic lane portion, as this would result in delays to the bus service. Junction modelling of this option through Santry Village showed extensive queuing at the Lorcan Road/Omni Park Shopping Centre, Shanowen Road and Shanrath Road junctions, which are in close proximity to each other (300m between the Lorcan Road/Omni Park and Shanowen Road junctions and 250m between the Shanowen Road and Shanrath Road junctions). On this basis, signal-controlled bus priority was discounted as a feasible option through Santry Village.

Based on the following key findings from the Multi-Criteria Assessment undertaken for this section of the study area, Route Option SY1B (two-way option) is the Preferred Route Option for the following reasons:

- It performs more favourably under the Integration criterion because this option requires no changes to the current traffic management regime in Santry. SY1C would require detours and increased journey times for traffic travelling to and from the north with an origin or destination in the southern parts of Santry and people travelling south from the southern parts of Santry;
- It performs more favourably under the Accessibility and Social Inclusion criterion because under Option SY1C, journey times of the regular trips made by local residents living between the Omni Park Shopping Centre and Shantalla Road/Swords Road Roundabout would be increased.

In addition to the above alternative solution which specific to Santry Village, Chapter 3 of the EIAR sets out the reasonable alternatives studies and the main reasons for the selection of the Proposed Scheme taking into account the effects on the environment. Within this Chapter consideration is given to strategic alternatives including both light rail and metro. Section 3.2.5 of this chapter states that the appropriate type of public transport provision in any particular case is predominately determined by the likely quantum of passenger demand along the particular public transport route.

'For urban transport systems, bus-based transport is the appropriate public transport mode for passenger demand levels of up to 4,000 passengers per hour per direction. (UITP 2009). Light rail provision would generally be appropriate to cater for passenger demand of between 3,500 and about 7,000 passengers per hour per direction. Passenger demand levels above 7,000 passengers per hour per direction would generally be catered for by heavy rail or metro modes, which would

usually be expected to serve a number of major origins or destinations along a Particular corridor. In the case of both the bus and light rail modes, higher levels of passenger demand than the above stated figures can be accommodated under specific conditions.

The development of the prior GDA Transport Strategy considered the likely public transport passenger demand levels across the region using the NTA's transport model and took into account the other studies referenced above, in addition to studies that had been carried out to investigate a potential light rail scheme within the area of this corridor. Likely passenger flows were identified to be within the capacity of bus transport, without reaching the quantum of passenger demand which would support the provision of a higher capacity rail solutions in addition to a Metrolink. Section 3.2.1 set out various studies undertaken for the prior GDA Transport Strategy. Arising from these studies and the specific assessment and transport modelling work undertaken for the prior Strategy, it was concluded that a bus-based transport system would be the proposed public transport solution in the corridor of the Proposed Scheme. The proposed transport solution would be supplemented by Metro, to provide more passenger capacity and enhanced interchange between the Luas Red and Green Line Services, proposed Metrolink Station at Fosterstown, Sligo/Maynooth Line Heavy Rail Services at Drumcondra Station and the Suburban Interchange between the Orbital and Radial Routes at Coolock Lane. It was considered that there would be insufficient demand to justify the provision of an additional light rail alternative beyond what is proposed above, particularly given the low to medium density nature of development in this corridor.

Similar to BRT, the light rail option would be worse for the environment in terms of construction impacts, including flora and fauna, heritage, air and noise, compared to the CBC proposal. Light rail requires continuous unbroken physical lane infrastructure to achieve high-priority. This would involve significantly more land take and potentially involve demolition of buildings at pinch-points. In the case of the CBC proposals, bus-priority can be achieved through short lengths at pinch-points by the use of signal controlled priority.

Given the consideration of light rail provision, and the level of likely public passenger use along this overall corridor assessed in the transport modelling work, the development of the prior GDA Transport Strategy identified that a Metro solution would be economically justified within the area covered by this corridor. Therefore, it is intended to develop the light rail Metro system along this corridor through the implementation of MetroLink.

Arising from the various studies and analysis that had been carried out, and the specific assessment and transport modelling work undertaken for the prior GDA Transport Strategy, 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. This is because 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.'

With respect to congestion charging, Section 3.2.8 of the EIAR states that a key success factor of demand management is greater use of alternative travel modes, in particular public transport. In the case of Dublin, the existing public transport system does not currently have sufficient capacity to cater for larger volumes of additional users.

'In advance of a significant uplift in overall public transport capacity in the Dublin metropolitan area, the implementation of major demand management measures across that area would be unsuccessful. Effectively constraining people from making journeys by car and requiring them to use other modes, without those modes having the necessary capacity to cater for such transfer, would not deliver an effective overall transport system. Instead, the capacity of the public transport system needs to be built up in advance of, or in conjunction with, the introduction of major demand management measures in the Dublin metropolitan area. This is especially true in the case of the bus system where a major increase in bus capacity through measures such as the Proposed Scheme would be required for the successful implementation of large scale demand management initiatives.

While the foregoing addresses the dependency of demand management measures on public transport capacity, it is equally correct that the provision of greatly enhanced cycling facilities will also be required to cater for the anticipated increase in cycling numbers, both in the absence of demand management measures and, even more so, with the implementation of such measures.

Demand management initiatives by themselves will not deliver the level of segregated cycling infrastructure required to support the growth in that mode. Consequently, the progression of demand management proposals will not secure the enhanced safe cycling infrastructure envisaged under the Proposed Scheme.'

Finally it is noted that park and ride and cashless fares both form part of the broader BusConnects programme and may be implemented to complement improvements to the overall bus system, including the Proposed Scheme infrastructure.

iv) Construction Impacts

The objection raises a concern in relation to the damage that might be caused during the construction works and also that the scheme would cause a massive noise nuisance.

With regard to damage during the construction works, Section 9.5.1.2 of Chapter 9 Noise and Vibration of Volume 2 of the EIAR describes the likely vibration levels associated with construction activities, it is considered that the construction of the Proposed Scheme is not expected to give rise to vibration that is either significantly intrusive or capable of giving rise to structural or cosmetic damage to buildings. Vibration from construction activities will be limited to the values set out in Table 9.10 to avoid any form of potential cosmetic damage to buildings and structures. Monitoring will be undertaken at identified sensitive buildings, where proposed works have the potential to be at or exceed the vibration limit values in Table 9.10 - Recommended Construction Vibration Thresholds for Buildings.

Section 9.4.4.2 of EIAR Volume 2 Chapter 9 Noise and Vibration considers the operational vibration impact of the Proposed Scheme. Analysis of traffic data for the Proposed Scheme indicates a reduction in overall AADT traffic flows along the core bus corridor. Reference to the monitoring results in Table 9.26 and Table 9.27 of Chapter 9 confirms that vibration levels associated with passing buses and other vehicular traffic at distances of 2.5 to 10m from the road edge are negligible in terms of human perception and building response. Vibration levels associated with a passing bus were recorded at 0.1mm/s PPV or less under the monitored scenarios. These values are below the normal range of perceptible human response to vibration and would not pose any significant impact.

Regarding the noise impact of the Proposed Scheme, Section 9.4.4.1 of EIAR Volume 2 Chapter 9 Noise and Vibration provides details of the assessment undertaken for the Operational Phase of the Proposed Scheme in respect of the potential noise and vibration impacts associated with altered traffic flows, realigned traffic lanes and displaced traffic flows.

Section 9.4.4.1.1.5 states that '*Along the majority of roads of the Proposed Scheme within the 1km study area, impacts as a result of traffic redistribution are determined to be Indirect, Positive, Imperceptible to Slight to Moderate, and Short to Medium Term to Negative, Moderate, and Short to Medium term once the Proposed Scheme becomes operational*.' It goes on to state that '*There are a small number of roads in the overall study area where there are potential initial significant impacts. These are defined as roads with a traffic noise level above a daytime noise level of 55 dB LAeq,16hr an increase in noise level greater than 3 dB*.' Table 9.45 lists these roads and Swords Road is not included in Table 9.45.

Section 9.5.2.1 summarises the change in road traffic noise in the operation phase as follows: *'The impact assessment has determined that there are no calculated significant direct or indirect traffic noise impacts across the study area for the Proposed Scheme. The range of noise level changes and overall noise levels calculated do not require any specific noise mitigation measures to be incorporated into the Proposed Scheme.'*

In respect of electric buses, as discussed in Section 9.4.4.1.1.4 of Chapter 9, during the proposed Opening Year (2028), the NTA forecast is for 94% of the city bus fleet to be EVs or HEVs. For the Design Year (2043), the city bus fleet is forecast to be 100% electric. The operation of electric and hybrid buses will eliminate ICE noise from buses accelerating, decelerating and idling at bus stops which is the dominant noise source.

In addition, the characteristic of noise from EVs is subjectively less intrusive compared to those with ICE's and is masked to a much greater extent by surrounding road traffic. It is noted the bus stops along the Proposed Scheme will be used by other bus operators which may not transition to EV and HEVs over the same period as the city bus fleet. The volume of these buses along the Proposed

Scheme will, however, be significantly less than the city bus fleet and hence, noise levels associated with these areas will not generate significant noise levels over the prevailing noise environment.

With respect to construction noise impacts, as noted in Figure 9.3 in Volume 3 of the EIAR, a Slight – Moderate noise impact is forecast along Swords Road through Santry Village.

The EIAR contains a comprehensive set of mitigation measures to minimise construction phase impacts, including noise impacts. Construction noise mitigation measures are set out in Chapter 9 in Volume 2 of the EIAR (and are also summarised in Appendix 5.1 (Construction Environmental Management Plan) in Volume 4 of the EIAR).

Section 9.5.1.1 of EIAR Volume 2 Chapter 9 states that: *'The appointed contractor will be required to take specific noise abatement measures to the extent required and comply with the recommendations of BS 5228–1 (BSI 2014a) and S.I. No. 241/2006 - European Communities (Noise Emissions by Equipment for Use Outdoors) (Amendment) Regulations 2006.'* It also states that '*During the Construction Phase, the appointed contractor will be required to manage the works to comply with the limits detailed in Section 9.2.4.1 using methods outlined in BS 5228–1 (BSI 2014a)*'

Section 9.5.1.1 also states that *'BS 5228–1 includes guidance on several aspects of construction site practices, which include, but are not limited to:*

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

Specifically, Section 9.5.1.1. states that *'The appointed contractor will put in place the most appropriate noise control measures depending on the level of noise reduction required at individual working areas (i.e. based on the construction threshold values for noise and vibration set out in Table 9.8: and Table 9.11).'* [Note - Table 9.8 of Section 9.2.4.1 of EIAR Chapter 9 sets out the Construction Noise Threshold (CNT) Levels for the Proposed Scheme].

Section 9.5.1.1.4 of Chapter 9 sets out the proposed working hours and states: *'It is envisaged that generally construction working hours will be between 07:00hrs and 23:00hrs on weekdays, and between 08:00hrs and 16.30hrs on Saturdays. Night-time and Sunday working will be required during certain periods to facilitate street works that cannot be undertaken under daytime / evening time conditions.'*

However, the contractor will also have to take account of sensitive receptors (in particular any nearby residential areas). Section 9.5.1.1.4 goes on to state: '*The planning of such works will take consideration of sensitive receptors, in particular any nearby residential areas. Construction activities will be scheduled in a manner that reflects the location of the site and the nature of neighbouring properties. Construction activities / plant items will be considered with respect to their potential to exceed construction noise thresholds at NSLs and will be scheduled according to their noise level, proximity to sensitive locations and possible options for noise control. In situations where an activity with potential for exceedance of construction noise thresholds is scheduled (e.g. road widening and utility diversions or activities with similar noise levels identified in Table 9.42), other construction activities will be scheduled to not result in significant cumulative noise levels'.*

In summary the noise abatement measures set out in the EIAR that the appointed contractor will be required to put in place to comply with the limits detailed in Section 9.2.4.1 using methods outlined in BS 5228–1 will result in appropriate and adequate mitigation measures in respect of construction noise impact at this location during construction.

The objection also raises concerns that there will be an increase in vermin due to the construction works. Appendix A5.1 (Construction Environmental Management Plan (CEMP)) in Volume 4 Part 1 of the EIAR sets out the management framework for the delivery of the proposed construction works. As outlined in Section 5.1.1.2 of the CEMP, '*The appointed contractor will need to comply with all relevant environmental legislation and take account of published standards, accepted industry practice, national guidelines, and codes of best practice appropriate to the Proposed Scheme*'. Section 5.5 of the CEMP is the '*Construction and Demolition Resource and Waste Management Plan*' which details the requirements for waste management during construction.

v) Information request (Policy)

The Transport Strategy for the Greater Dublin Area 2022-2042 (hereafter described as the GDATS) was published for consultation on the 9 November 2021 and has been prepared in accordance with Section 12 of the Dublin Transport Authority Act 2008 (as amended). It was adopted in January 2023 and replaces the previous Transport Strategy for the Greater Dublin Area 2016 – 2035. Under the Dublin Transport Authority Act 2008, the NTA must review its Transport Strategy every six years. The GDATS is considered to be an essential component for the orderly development of the GDA for the next 20 years. The overall aim of the strategy is *'To provide a sustainable, accessible and effective transport system for the Greater Dublin Area which meets the region's climate change requirements, serves the needs of urban and rural communities, and supports the regional economy'*. A key focus of the strategy is to enable increased use of other transport modes to meet environmental, economic and social objectives related to emissions, congestion and car dependency. It sets a clear direction towards a 50% reduction in CO2 emissions within the GDA area by 2030. The Transport Strategy report and background documents can be downloaded from the following website:

https://www.nationaltransport.ie/planning-and-investment/strategic-planning/greater-dublin-area-transport-strategy/ .

This includes a link to the Strategic Environmental Assessment which was conducted as part of that process. This GDATS was subject to its own public consultation process.

The GDATS sets out a range of measures and those of relevance to the Proposed Scheme are outlined in Table 2.3. The GDA Transport Strategy 2022 - 2042 (NTA 2022) puts the delivery of Dublin BusConnects, of which the Proposed Scheme is part, at the heart of its objectives. There is added emphasis on the delivery of public transport, active travel and enhanced accessibility to sustainable modes of transport, all of which the Proposed Scheme will help to deliver.

Table 2.3 GDA Transport Strategy 2022 – 2042 Measures

Measure Number	Measure	How the Proposed Scheme meets the Measure
PLAN2 – The Road User Hierarchy	*The NTA, in the decision-making process around the design, planning and funding of transport schemes in the GDA, will be guided by the priority afforded to each mode in the Road User Hierarchy as set out in the Transport Strategy.'*	The Proposed Scheme aligns with the measure as it will promote modal shift from private car to a more sustainable forms of transport. It enhances active travel networks and thus encourages the use of these modes reducing reliance on the private car.
PLAN14 - Urban Design in Major Infrastructure Projects	*'The NTA will incorporate a high standard of urban design and placemaking, taking into account architectural heritage, into the planning and design of all major public transport infrastructure schemes and will consider how greater biodiversity can be fostered.'*	The overall landscape and public realm design strategy for the Proposed Scheme aims to create attractive, consistent, functional and accessible places for people alongside the core bus and cycle facilities. In addition, opportunities have been sought to enhance the public realm and landscape. As part of the Proposed Scheme public realm improvements are proposed at several locations. For example, the Drumcondra Road Upper shopping parade is identified as a local enhancement opportunity to improve the image of the public realm, this includes footway enhancements and upgrades to the parking bays. Similarly, the area in front of The Comet in Santry is proposed to have surface treatment enhancements and de-cluttering and reorganising of the street furniture. All the plants and trees selected will be native species, appropriate to the location. 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.
Measure PLAN15 – Urban Design in Walking and Cycling Projects	*'In the design, planning and prioritisation of walking and cycling schemes, the NTA and the local authorities will ensure the incorporation of urban design and placemaking considerations, taking into account architectural heritage, and will consider how greater biodiversity could be fostered.'*	The overall landscape and public realm design strategy for the Proposed Scheme aims to create attractive, consistent, functional, and accessible places for people alongside the core bus and cycle facilities. Along the route of the Proposed Scheme, improvements and enhancements will be made to footpaths, walkways, and pedestrian crossings.

Measure Number	Measure	How the Proposed Scheme meets the Measure
		Additional landscaping and outdoor amenities will be provided to improve the local urban realm.
Measure PLAN16 – Reallocation of Road Space	*'The NTA, in conjunction with the local authorities, will seek the reallocation of road space in appropriate locations in Dublin City Centre, Metropolitan towns and villages, and towns and villages across the GDA in accordance with the road user hierarchy, in order to prioritise walking, cycling and public transport use and prioritise the placemaking functions of the urban street network.'*	The Proposed Scheme will support integrated sustainable transport usage through road space reallocation in support of infrastructure improvements for active travel (both walking and cycling), and the provision of enhanced bus priority measures for existing (both public and private) and all future services who will use the corridor. The Proposed Scheme reallocates road space along the route to facilitate full and continuous bus lanes along the north and south quays.
Measure INT3 – Integration of all Modes in Transport Schemes	*'It is the intention of the NTA, in the design and planning of transport schemes, to ensure that the needs of all transport modes are considered, as appropriate, based on the objectives of the scheme and on the road user hierarchy.'*	The Proposed Scheme aligns with the measure as it will service the current and future transport needs of Dublin. It enhances active travel networks and thus encourages the use of these modes reducing reliance on the private car.
Measure INT6 - Interchange	*'It is the intention of the NTA, in conjunction with local authorities and transport operators, to ensure that passengers wishing to change between services on the transport network are provided with a safe, convenient and seamless interchange experience.'*	The Proposed Scheme aligns with the measure as it will enhance the interchange between the various modes of public transport operating in the city and wider metropolitan area, both now and in the future. The design has been developed with this in mind and, in so far as possible, is seeking to provide for improved existing or new interchange opportunities with other transport services. These include: • Existing and future Dublin Bus services at numerous locations along the route; • Future bus service proposals including Spine A associated with the New Dublin Area Bus Network; • MetroLink high-frequency rail line running from Swords to Charlemont linking Dublin Airport, Irish Rail, DART and Luas services; • Greater Dublin Area Cycle Network Plan (GDACNP); • Future public transport proposals such as DART Plus scheme at Drumcondra; • Interface with New Dublin Area Bus Network; • Griffith Avenue Protected Cycle Lane Scheme; • Santry River Greenway; and • Royal Canal Greenway.
Measure INT19 – Travelling at Night	*'The NTA will work with transport operators, local authorities and An Garda Síochána to improve security and perceptions of security for people using public transport, and walking and cycling at night by improving lighting at public transport stops and stations and along access points to and from stops, assisting local authorities to design in passive surveillance and high quality lighting along pedestrian routes, and to reduce anti-social behaviour around stops and stations.'*	The Proposed Scheme has considered security and safety in its design, and it provides lighting as appropriate to the end use. The Proposed Scheme will include upgrades to existing public lighting. In addition to public lighting, it is proposed to install traffic monitoring cameras at key locations to enable the monitoring of traffic flows along the Proposed Scheme and provide rapid identification of any events that are causing, or are likely to cause, disruption to bus services on the route and to road users in general.
Measure INT20 – Accessible Infrastructure	*'During the period of the Transport Strategy, the NTA will ensure that public transport infrastructure, and facilities in the GDA are made accessible for all users, and that additional resources for the maintenance and repair of lifts are made available.'*	The Proposed Scheme has been designed to include: • More bus shelters, seating, accessible footways and bus infrastructure to make the bus transit experience more accessible for users of all abilities and ages; and • Provision and enhancement of cycling facilities along the Proposed Scheme, creating routes that are safe, accessible and attractive for people of all abilities and ages.
Measure INT25 – Construction Management	*The NTA, in conjunction with the local authorities, TII, Irish Rail, and other agencies will ensure that the level of disruption to the transport system and to wider activity throughout the region will be minimized, and that up-to-date travel information is*	The Construction Travel Management Plan (CTMP) of the Proposed Scheme will help to ensure that disruption is minimised, with access to houses and businesses maintained.

Measure Number	Measure	How the Proposed Scheme meets the Measure
	provided during the construction of transport infrastructure projects.	
Measure WALK2 – Improved Footpaths	*The NTA, in conjunction with local authorities, will implement footpath improvement schemes across the GDA where required throughout the period of the Transport Strategy in order to ensure that they are of sufficient width, adequately lit, serve both sides of the road in urban areas (in most cases), are of good quality surfacing, provide for seating at appropriate locations, and are free of unnecessary clutter.* *Footpaths will also be maintained and improved in a manner which contributes positively to the public realm.*	Along the Proposed Scheme improvements and enhancements will be made to footpaths, walkways, and pedestrian crossings. Additional landscaping and outdoor amenities will be provided to improve the local urban realm. Several urban realm upgrades, including widened footpaths, high quality hard and soft landscaping and street furniture will be provided in areas of high activity to contribute towards a safer, more attractive environment for pedestrians.
Measure WALK4 – Improved Junctions	*'The NTA, in conjunction with local authorities, will implement junction improvements across the GDA as follows:* *• To enhance safety at junctions, a programme of "narrowing" junctions by reducing kerb-line radii will be undertaken as a means of managing vehicular speeds; and* *• To enhance movement by pedestrians and cyclists, a programme of removal of slip lanes will be undertaken at appropriate locations, together with consideration of junction signaling changes to better balance the use of the junction between motorised and vulnerable modes, and in urban areas, junctions will be designed so as footpaths on side roads will be carried through at-grade, where practicable and safe to do so.'*	The Proposed Scheme provides infrastructure that will support sustainable transport and will improve the safety of road users through junction improvement and the segregation of road vehicles and active travel modes, where possible. The design of each junction has given priority to pedestrian, cycle and bus movements. Junctions have been designed to ensure a high level of comfort and priority for sustainable modes of travel e.g. walking, cycling and public transport by prioritising the space and time allocated to these modes within the operation of a junction.
Measure WALK9 – Disabled People	*'Local authorities in the GDA and the NTA will take full account of disabled people and pedestrians with mobility impairments when delivering transport schemes which affect the pedestrian environment; and will implement improvements to existing facilities where appropriate and encourage the enforcement of the Road Traffic Laws in this regard.'*	A Disability Audit of the existing environment and proposed draft preliminary design for the corridor was undertaken. The Audit provided a description of the key accessibility features and potential barriers to disabled people based on the Universal Design standards of good practice. The Audit was undertaken in the early design stages with the view to implementing any key measures identified as part of the design development process. This audit has informed the design of the Proposed Scheme. The audit assessed footpaths, crossings / junctions, bus stops, parking and access for users with disabilities. Traffic signal layout design included accessibility considerations for the mobility impaired. Potential areas of conflict with other non-motorised users were considered to provide suitable separation where possible. It has been designed to include: • The interaction between pedestrians, cyclists, and buses at bus stops. The Proposed Scheme has prioritised the use of island bus stops, including signal call button for crossing of cycle tracks, to manage the interaction between the various modes with the view to providing a balanced safe solution for all modes; and • Clear segregation of modes at key interaction points along the Proposed Scheme which was highlighted as a potential mobility constraint in the Audit.
Measure CYC1 – GDA Cycle Network	*'It is the intention of the NTA and the local authorities to deliver a safe, comprehensive, attractive and legible cycle network in accordance with the updated Greater Dublin Area Cycle Network.'*	The Proposed Scheme aligns with the policy objective as it provides of segregated cycling facilities along the Proposed Scheme in both directions. These high-quality cycle track will generally be 2m in width offering a high level of service and help to reduce dependency on private car use for short journeys.
Measure CYC5 – Cycle Parking	*It is the intention of the NTA to deliver, through the statutory planning process and liaison with relevant stakeholders, high quality cycle parking at origins and destinations, serving the full spectrum of cyclists including users of non-standard cycles.*	Cycle parking is provided in a number of locations throughout the Proposed Scheme such as at some bus stop locations, where space is available.

Measure Number	Measure	How the Proposed Scheme meets the Measure
Measure CYC14 – Supporting Measures for Cycling	*'The NTA will monitor new developments related to supporting measures for cycling including emerging technologies, infrastructure, policies and programmes, with a view to their implementation in the GDA.'*	The Proposed Scheme has been designed in line with guidance documents and design standards relating to the design of urban streets, cycling facilities and urban realm.
Measure PT2 – Climate Proofing New Public Transport Infrastructure	*'The NTA will ensure that all new public transport infrastructure is proofed for resilience against the potential impacts arising from climate change.'*	The Proposed Scheme aligns with the measure as it comprises transport infrastructure that supports the delivery of an efficient, low carbon and climate resilient public transport service. Design principles included exploring opportunities for sustainable urban realm and landscape design responses such as SuDS, species rich planting and reusing materials, where possible. SuDS measures were designed to attenuate runoff for any newly paved areas. SuDS measures were designed to provide sufficient storage to ensure no increase in existing runoff rates.
Measure BUS1 – Core Bus Corridor Programme	*'Subject to receipt of statutory consents, it is the intention of the NTA to implement the 12 Core Bus Corridors as set out in the BusConnects Dublin programme.'*	The Proposed Scheme is part of the BusConnects programme to enhance bus services and active travel options in the Greater Dublin Area.
Measure BUS12 – New Bus Stops and Shelters	*'It is the intention of the NTA to continue to roll-out the programme of bus stop and shelter provision, and to monitor potential for further expansion and upgrade during the lifetime of the strategy.'*	The Proposed Scheme includes additional bus shelters, seating, accessible footways and bus infrastructure to make the bus transit experience more accessible for users.
Measure ROAD13 – Roadspace Reallocation	*'The local authorities and the NTA will implement a programme of road space reallocation from use by general traffic or as parking to exclusive use by sustainable modes as appropriate, as a means of achieving the following:* • *Providing sufficient capacity for sustainable modes;* • *Improving safety for pedestrians and cyclists; and* • *Encouraging mode shift from the private car and reducing emissions'.*	The Proposed Scheme reallocates road space for bus priority and cycling infrastructure. It will provide the infrastructure to deliver a modal shift from private car usage to sustainable transport.
Measure TM2 – Management of Urban Centres	*'The NTA and relevant local authorities, in collaboration, will deliver the public transport, cycling and walking networks, and public realm that are required to serve local centres, and to facilitate a post-Covid recovery based on sustainable transport.'*	The Proposed Scheme aligns with the measure as it will support sustainable transport modes through infrastructure improvements for active travel (both walking and cycling). The Proposed Scheme will bring greater accessibility to the city centre and other strategic areas for people to avail of housing, jobs, amenities and services. It aims to mitigate any adverse effects that the proposals may have on the streets, spaces, local areas and landscape through the use of appropriate design responses. In addition, opportunities have been sought to enhance the public realm and landscape design where possible.
MEASURE CLIMATE3	*Through the implementation of the full measures set out in this strategy, in combination with the plans and programmes of Government, the NTA will contribute to a reduction in CO2 emissions from transport in the GDA to below 1 MtCO2eq by 2042.*	The Proposed Scheme aligns with the objective through the development of transport infrastructure that supports the delivery of an efficient, low carbon and climate resilient public transport service. A greater increase in sustainable mode share will in turn lead to further reductions in GHG emissions, beyond those reported in the assessment. The Proposed Scheme has the potential to reduce GHG emissions equivalent to the removal of approximately 21,130 and 22,150 car trips per weekday from the road network in 2028 and 2043 respectively. This represents a significant contribution towards the national target of 500,000 additional trips by walking, cycling and public transport per day by 2030 as outlined as a target in the Government's 2021 Climate Action Plan.

This objection suggests that the Board should request Further Information and revised plans from the applicant. As stated in Chapter 1 Introduction of the EIAR, the EIAR is defined by the Environmental Protection Agency (EPA) Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (hereinafter referred to as the EPA Guidelines) as '*a report of the effects, if any, which proposed development, if carried out, would have on the environment and shall include the information specified in Annex IV of the Environmental Impact Assessment Directive*' (EPA 2022). The EIAR details the consideration of reasonable alternatives, consideration and assessment of likely significant impacts, mitigation, and avoidance measures to reduce significant adverse impacts, and an assessment of residual impacts. The Swords to City Centre scheme EIAR has been completed in accordance with all applicable legislation and all relevant guidance documents and will facilitate An Bord Pleanála (ABP) in undertaking an EIA for the Proposed Scheme under the EIA Directive1 and Section 50 of the Roads Act 1993, as amended by S.I. No. 279/2019 – European Union (Roads Act 1993) (Environmental Impact Assessment) (Amendment) Regulations 2019 (hereafter referred to as the Roads Act).

vi) Loss of Flora

The removal/relocation of particular plants can be agreed with the property owner as part of the accommodation works. Chapter 5 (Construction) in Volume 2 of the EIAR states the following with respect to land acquisition and boundary treatment (Section 5.5.2.1):

'*Any lands acquired temporarily to facilitate construction work will be returned to landowners on completion of the works. Existing boundary walls or fencing being relocated will be constructed to match the existing conditions, unless otherwise agreed. The removal of trees, vegetation, lawns, paving etc. will be minimised in so far as practicable*'.

Section 5.5.3.10 of Chapter 5 is on the subject of landscaping and states '*Where vegetation, grassed areas and hedgerows are disturbed during the works, these will be reinstated, and replaced, where practicable. New trees will be planted, in suitable tree pits, where necessary, at various locations as shown in the Landscaping General Arrangement Drawings (BCIDB-JAC-ENV_LA-0002_XX_00-DR-LL-9001) in Volume 3 of this EIAR*'.

Chapter 17 (Landscape (Streetscape) & Visual) in Volume 2 of the EIAR includes the following mitigation measures in Section 17.5.1 with respect to the impacts of land acquisition:

- '*Where properties are subject to permanent and/or temporary acquisition (as listed in Section 17.4.3.2.8 and Section 17.4.4.2.8), an inventory of boundary details and accesses, planting, paving, and other features that may be disturbed or removed will be prepared by the appointed contractor prior to commencement of construction works*'; and
- '*Where properties are subject to permanent and/or temporary acquisition (as listed in Section 17.4.3.2.8 and Section 17.4.4.2.8), appropriate measures will be put in place by the appointed contractor to provide for protection of features, trees and vegetation to be retained, and for continued access during construction and for adequate security and screening of construction works. All temporary acquisition areas will be fully decommissioned and reinstated at the end of the Construction Phase or at the earliest time after the reinstatement works are completed to the satisfaction of the NTA*'.

Fauna and Flora is assessed in Chapter 12 Biodiversity in Volume 2 of the EIAR. Natural Heritage Areas (NHAs) and Proposed Natural Heritage Areas (pNHAs) are designations under section 18 of the Wildlife (Amendment) Act to protect habitats, species or geology of national importance. These are listed in Table 12.9 of Chapter 12 and illustrated in Figure 12.4 in Volume 3 of the EIAR. 268 Swords Road does not fall within any NHAs nor pNHAs.

The non-Fossitt classification of 'residential' is used to '*represent residential properties along the Proposed Scheme corridor and generally consists of a mosaic of buildings and artificial surfaces (BL3), amenity grassland (GA2), flower beds and borders (BC4), ornamental shrubs (WS3) and hedgerows (WL1)*' as defined in Section 12.3.5.14 of Chapter 12. This habitat type was commonly encountered and was present across the entire scheme (illustrated in Figure 12.5 in Volume 3 of this EIAR). This habitat type is of Local Importance (Lower Value). Section 12.4.3.2.1 and Table 12.6 in Chapter 12 provides the estimated extent of total habitat loss across the Proposed Scheme. The loss of habitats outside of designated areas for nature conservation is assessed as being a 'Likely significant effect at the local geographic scale' during the Construction Phase as set out in

Table 12.19 in Chapter 12. Mitigation against the impact of habitat loss across the Proposed Scheme is stated in Section 12.5.1.2.1 of Chapter 12 and includes:

- '*Where practicable, areas of vegetation, including habitats of Local Importance (Higher Value), such as mixed broadleaved woodland, mixed broadleaved conifer woodland, scattered trees and parkland, immature woodland, treeline and hedgerow habitat types) which lie within the footprint, or along the boundary of the Proposed Scheme, will be retained*'; and
- '*To mitigate the loss of habitat, proposed planting incorporated into the Proposed Scheme will be implemented by the appointed contractor*'.

CPO-21 – Neil Sorahan

Summary of Objections Raised

The objection to the CPO raises seven potential issues:

i) Data Breach

A copy of the NTA correspondence in respect of 270 Swords Road was sent to the property addressed to 'The Occupiers' with documentation including the name of the respondents aforementioned client and his home address.

ii) Architectural/Archaeological Heritage

Comments were made stating that to interfere in any part of this property would be a massive step backwards in relation to the protection of Dublin's heritage. The preservation of in situ archaeology and the protection of the setting and character of vernacular groups of buildings are well established heritage and planning principles that will be compromised by the proposals.

iii) Impact on Property Value

The reduction in the buffer (garden) to increase the width of the heavily trafficked road will undermine the amenity and the value of the dwellings and these amenity impacts will be compounded by the elevated ground floor level of the dwellings relative to the level of the road.

The objection commented that their client has no issue in relation to infrastructural obligations but does not believe that this is the best course of action for the common good and believes that there is a reasonable, suitable and viable alternative available.

iv) Construction Impacts

The objection raised concerns in relation to the damage that might be done to the properties due to the construction works to be carried out. There was further concern there will be an increase infestation of vermin due to the construction works. The response all commented the Scheme would cause a massive noise nuisance.

v) Information request (Policy)

vi) Objection queried if it was possible to get sight of the 2022 review in accordance with number 15 of the 2008 Dublin Transport Act.

The objection raised concerns that the assessments have not adequately or properly detailed and established that the infrastructure cannot be accommodated within the existing road corridor and that given the disproportionate impact on the dwellings, the Board should request further information and revised plans from the applicant that accommodate the infrastructure within the existing road reservation and without the need to acquire a part of the gardens.

vii) Loss of Flora

The objection stated that a rich range and variety of flora that has matured over many years and because three unique cottages have been there for such a long time they have extreme sentimental value for their client and many other people living there because they have been tended to and planted by deceased relatives.

Response to Objections Raised

i) Data Breach

With regard to issues raised from a data protection perspective in relation to the "*disbursement of [the objectors] personal information to the occupants of 270 Swords Road, Santry, Dublin 9 without his consent*", in the context of the Proposed Scheme, the NTA processes personal data relating to landowners, occupants and lessees of the lands which are proposed to be subject to a compulsory purchase order ("***CPO***"). This processing includes the publication of personal information relating to such landowners, occupants and lessees in the schedule appended to the statutory CPO notice for the Proposed Scheme. The NTA does not seek consent from the relevant individuals to the processing of their personal information for these purposes. Instead, the legal basis on which the NTA publishes such details is Article 6(1)(c) of the GDPR, i.e. that this is necessary for compliance with a legal obligation to which the NTA is subject. This legal obligation is set out in Article 4(b) of the Third Schedule to the Housing Act 1966 (as amended) which requires the NTA to "*serve on every owner, lessee and occupier of any land to which the [compulsory purchase order] relates a notice in the prescribed form stating the effect of the order and that it is about to be submitted to [An Bord Pleanála] for confirmation and specifying the time within which and the manner in which objections can be made thereto*".

The "*prescribed form*" referred to in Article 4(b) above is Form No. 8 in the Housing Act 1966 (Acquisition of Land) Regulations 2000 (S.I. No. 454 of 2000), which requires a schedule to be appended to that form. The directions for completing Form No. 8 state that in the schedule to Form No. 8, the land which is the subject of the CPO should be described as in the CPO itself. The CPO lists out the names and addresses of the landowners which are proposed to be subject to the CPO.

Accordingly, the NTA was under a clear legal obligation to serve the statutory CPO notice on every owner, lessee, and occupant of 270 Swords Road. The NTA was also required to include the name and address of the objector (as owner of the relevant land) in the Schedule appended to the CPO notice which was served on every owner, lessee, and occupant.

The processing of the objectors personal data in the manner outlined above is reflected in the Privacy Notice for BusConnects Dublin which was enclosed with the statutory CPO notice served on the objector, which clearly sets out that the NTA may process personal data for the purpose of compiling CPO documentation in order to make the CPO in accordance with its legal obligations under the Housing Act 1966 (as amended). The Privacy Notice also provides that personal data relating to landowners may be provided to members of the public where this is required under applicable law, which applies in these circumstances since details of the objectors ownership of 270 Swords Road are required to be included in the CPO and in CPO notices issued to landowners, occupants, and lessees.

In light of the above, we do not accept any suggestion that the publication of the objectors personal data in the Schedule appended to the CPO notice amounts to a personal data breach.

ii) Architectural/Archaeological Heritage

Chapter 15 (Archaeological & Cultural Heritage) in Volume 2 of the EIAR considers the potential impact of the Proposed Scheme on archaeology and cultural heritage during both the Construction and Operational Phases. As shown in Figure 15.1 (Sheet 11) in Volume 3 of the EIAR, there are no monuments on the Record of Monuments and Places (RMP) or the Sites and Monuments Record (SMR) recorded at or within the vicinity of St. Canice's Terrace. There is however a non-designated archaeological site marked on Shanowen Road in close proximity to the terrace, namely the site of a former lodge associated with 'White House' (Reference Number CBC0002AH015). As described in Appendix A15.2 (Archaeological and Cultural Heritage Inventory) in Volume 4 Part 3 of the EIAR:

'*A lodge associated with 'White House' is depicted at this location on the 25-inch OS map of 1907. This structure had been demolished by the time of the last edition OS six-inch map of 1938. While there is no above ground trace, subsurface features may survive and be affected by any ground-breaking works at this location. The non-designated archaeological site has a low sensitivity value and the magnitude of impact is medium, resulting in a slight impact.*'

Section 15.5.1 of Chapter 15 describes the Construction Phase mitigation measures, including the following with respect to archaeological monitoring:

'*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 be resolved to the satisfaction of the DHLGH and the NMI. The appointed contractor will ensure that the archaeologist will have the power to inspect all excavation to formation level for the proposed works and to temporarily halt the excavation work, if and as necessary, having conferred with the NTA. They will be given the power to ensure the temporary protection of any features of archaeological importance identified. The archaeologist will be afforded sufficient time and resources to record and remove any such features identified in accordance with the licensing requirements agreed.*'

Chapter 16 (Architectural Heritage) of Volume 2 of the EIAR assesses the impact of the Proposed Scheme on structures of Architectural Heritage interest as a result of both construction and operation within a 50m study area around the Proposed Scheme.

St. Canice's Terrace (258 to 280 Swords Road) has no official heritage designation, however it has been identified within the assessment in Chapter 16 under the heading of '*Other Structures of Built Heritage Interest*' and given the Reference Number CBC0002BTH018. The impact on it has therefore been included within the impact assessment. St Canice's Terrace is marked as a heritage feature in Figure 16.1 (Sheet 11) in Volume 3 of the EIAR, and is included in Appendix A16.2 (Inventory of Architectural Heritage Sites) in Volume 4 Part 3 of the EIAR (in Section 16.6).

Section 16.4.3.6 of Chapter 16 provides detail on the impact assessment on '*Other Structures of Built Heritage Interest*' during the Construction Phase, with St Canice's Terrace identified as one such structure which will be directly impacted by the Proposed Scheme, stating:

'At St Canice's Terrace, 258 to 280 Swords Road Whitehall, Dublin 9 (CBC0002BTH018), the existing cottages will be impacted by the proposed land-take at the front boundary onto Sword's Road. The original boundaries comprised of low retaining walls topped with simple iron or steel railings and steel pedestrian gates. They are in varied condition with many having had their original railings removed and their front walls raised, though most retain the original gates and piers. The houses are of Low sensitivity. The loss of the remaining fabric of the front boundary will have a Negative impact, the magnitude of which is Medium. The predicted Construction Phase impact will be Direct, Negative, Slight and Permanent.'

Appendix A16.3 (Methodology for Works Affecting Sensitive and Historic Fabric) in Volume 4 Part 3 of the EIAR outlines the requirements when working near or on historic fabric. Section 16.3 of Appendix A16.3 specifically describes the requirements for the recording, removal, storage and reconstruction of boundary treatments.

The NTA will prepare detailed accommodation works plans in consultation with impacted landowners upon confirmation of the CPO by An Bord Pleanála. Section 4.6.18.1 of Chapter 4 Proposed Scheme Description describes the approach for boundary treatment. To maintain the character and setting of the Proposed Scheme, the approach to undertaking the new boundary treatment works along the corridor is replacement on a 'like for like' basis in terms of material selection and general aesthetics.

iii) Impact on Property Value

With respect to property values, Chapter 10 (Population) Appendix A10.2 (Economic Impact of Core Bus Corridors) in Volume 4 Part 3 of the EIAR assesses the potential economic impact of the Core Bus Corridors, which includes consideration of the impact on property value. In Section 3 of the report, and specifically the section on 'The impact on property values', the conclusion states that:

'*The public realm improvements planned by the NTA may lead to an increase in value of both residential and retail property prices, especially in the community centres along the corridors. Evidence shows that investing in public realm creates nicer places that are more desirable for people and business to locate in, thereby increasing the value of properties in the area. The evidence suggests that all public realm improvements generate value, regardless of the size of the investment or the neighbourhood. Residents along the corridors will also see a measurable increase in their quality of life, with evidence showing that residents are willing to pay more for an improved public realm.*'

Chapter 6 (Traffic & Transport) in Volume 2 of the EIAR provides an assessment of the impact the Proposed Scheme will have on traffic volumes once operational, both directly along the route of the Proposed Scheme, and on the surrounding road network. As described in Section 6.4.6.2.8 of Chapter 6, traffic modelling was carried out to assess the predicted traffic volumes in 2028 once the Proposed Scheme is fully operational, in both the AM and PM peak hours compared to the predicted traffic in the absence of the Proposed Scheme (the Do Minimum scenario). With respect to the Swords Road in the vicinity of this property, the results of the modelling showed a decrease in general traffic during both the AM peak of 807 Passenger Car Units (Table 6.67 in Chapter 6), and the PM peak of 548 Passenger Car Units (Table 6.71 in Chapter 6).

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation, which can include perceived loss in property, and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage its agent / valuer in preparing, negotiating and advising on compensation.

iv) Alternative Solutions

In terms of alternative solutions, Chapter 3 of the EIAR sets out the reasonable alternatives studies and the main reasons for the selection of the Proposed Scheme taking into account the effects on the environment. Within this Chapter consideration is given to alternatives considered at the Draft Preferred Route Option Stage while developing the Preferred Route Option. Section 3.4.1.1 of Chapter 3 of the EIAR states that the design development and assessment work carried out at the Draft Preferred Route Option Stage. This is also documented in Section 6.2.2.2 of the Preferred Route Option Report (provided as part of the Supplementary Information of the EIAR), looked at a one-way option through Santry Village, which was considered.

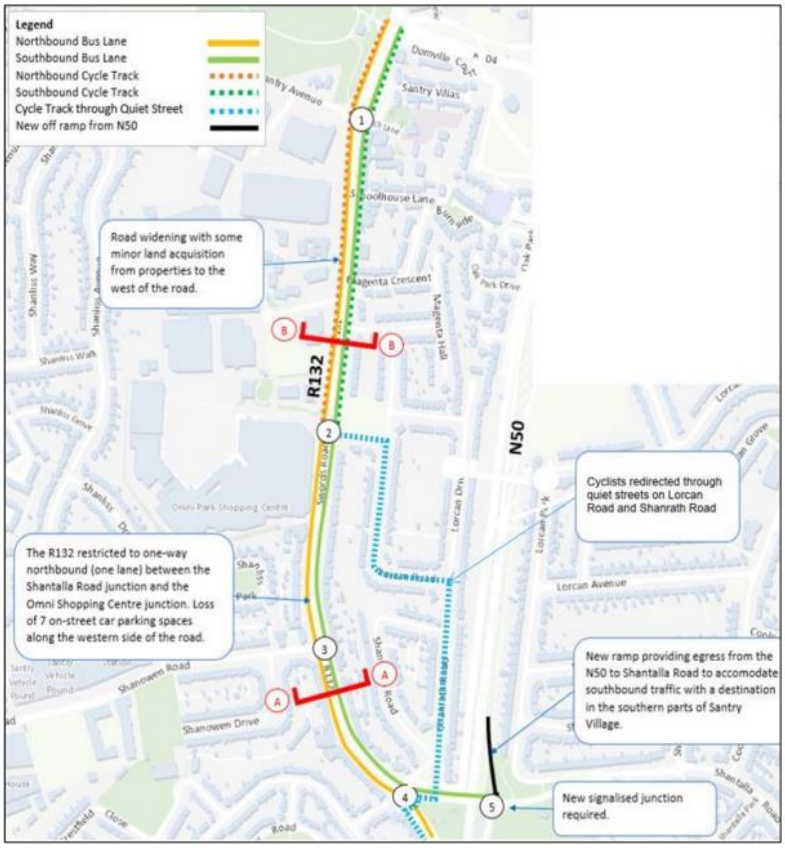

Figure 2.14 One-Way Route Option through Santry Village (Option SY1C)

This option removes southbound traffic between Omni Shopping Centre and Shantalla Road to minimise land acquisition on Swords Road for this section of the scheme. A bus lane would be provided in each direction but only one traffic lane (northbound) would be maintained for general traffic.

Combined with the proposal to redirect cyclists through Lorcan Road and Shanrath Road this option would negate the need for any land acquisition along this section of the scheme.

To allow access from the north to properties in the south of Santry Village, this option would require the construction of a new southbound slip road off the N50 at Shantalla Road. The new slip road would join the Shantalla Road via a new signalised junction.

A cross-section on Swords Road for this scheme option is illustrated in Figure 2.15.

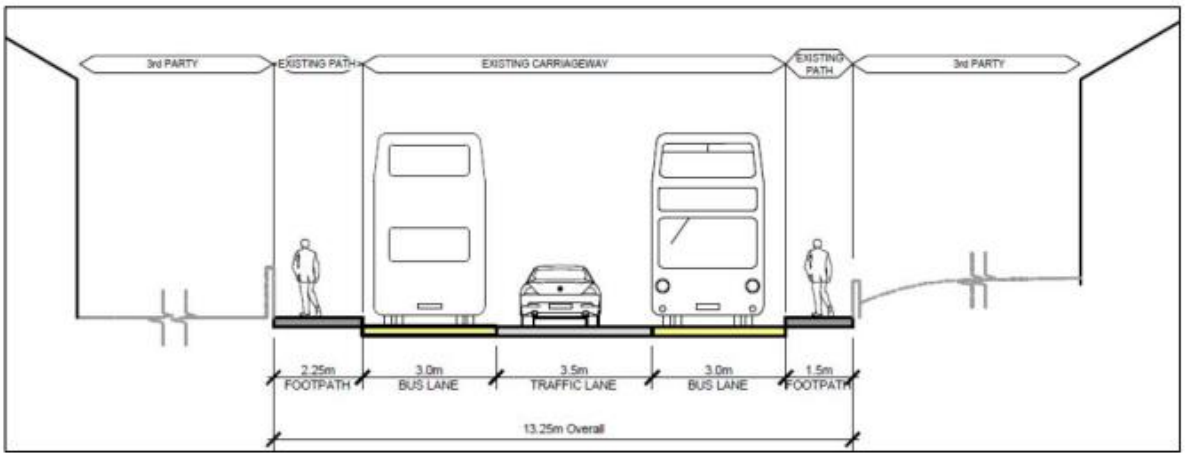

Figure 2.15 SY1C Cross-Section A-A Swords Road South of Omni Shopping Centre

The proposed traffic management changes would have a direct impact on traffic routes to, from and through the southern part of Santry Village.

The Stage 2 Route Options Assessment – Multi-Criteria Analysis table for this section is included in Appendix A of the Preferred Route Option Report.

A summary of the assessment and relative ranking of route options against the five main assessment criteria is presented in Table 2.5 below.

Table 2.4 Santry Village Final Summary of MCA

Assessment Criteria	Option 1 (SY1B) Two-Way Option	Option 2 (SY1C) One-Way Option
Economy		
Integration		
Accessibility and Social Inclusion		
Safety		
Environment		

Signal-controlled bus priority (similar to that adopted at Santry Demesne, see Section 6.2.1 of the Preferred Route Options Report) was also considered as an option through Santry Village, in order to reduce the impact on land take. For signal-controlled bus priority to operate successfully, queue lengths from the next junction cannot be allowed to develop on the shared bus/traffic lane portion, as this would result in delays to the bus service. Junction modelling of this option through Santry Village showed extensive queuing at the Lorcan Road/Omni Park Shopping Centre, Shanowen Road and Shanrath Road junctions, which are in close proximity to each other (300m between the Lorcan Road/Omni Park and Shanowen Road junctions and 250m between the Shanowen Road and Shanrath Road junctions). On this basis, signal-controlled bus priority was discounted as a feasible option through Santry Village.

Based on the following key findings from the Multi-Criteria Assessment undertaken for this section of the study area, Route Option SY1B (two-way option) is the Preferred Route Option for the following reasons:

- It performs more favourably under the Integration criterion because this option requires no changes to the current traffic management regime in Santry. SY1C would require detours and increased journey times for traffic travelling to and from the north with an origin or destination in the southern parts of Santry and people travelling south from the southern parts of Santry;
- It performs more favourably under the Accessibility and Social Inclusion criterion because under Option SY1C, journey times of the regular trips made by local residents living between the Omni Park Shopping Centre and Shantalla Road/Swords Road Roundabout would be increased.

In addition to the above alternative solution which specific to Santry Village, Chapter 3 of the EIAR sets out the reasonable alternatives studies and the main reasons for the selection of the Proposed Scheme taking into account the effects on the environment. Within this Chapter consideration is given to strategic alternatives including both light rail and metro. Section 3.2.5 of this chapter states that the appropriate type of public transport provision in any particular case is predominately determined by the likely quantum of passenger demand along the particular public transport route.

For urban transport systems, bus-based transport is the appropriate public transport mode for passenger demand levels of up to 4,000 passengers per hour per direction. (UITP 2009). Light rail provision would generally be appropriate to cater for passenger demand of between 3,500 and about 7,000 passengers per hour per direction. Passenger demand levels above 7,000 passengers per hour per direction would generally be catered for by heavy rail or metro modes, which would usually be expected to serve a number of major origins or destinations along a Particular corridor. In the case of both the bus and light rail modes, higher levels of passenger demand than the above stated figures can be accommodated under specific conditions.

The development of the prior GDA Transport Strategy considered the likely public transport passenger demand levels across the region using the NTA's transport model and took into account the other studies referenced above, in addition to studies that had been carried out to investigate a potential light rail scheme within the area of this corridor. Likely passenger flows were identified to be within the capacity of bus transport, without reaching the quantum of passenger demand which would support the provision of a higher capacity rail solutions in addition to a Metrolink. Section 3.2.1 set out various studies undertaken for the prior GDA Transport Strategy. Arising from these studies and the specific assessment and transport modelling work undertaken for the prior Strategy, it was concluded that a bus-based transport system would be the proposed public transport solution in the corridor of the Proposed Scheme. The proposed transport solution would be supplemented by Metro, to provide more passenger capacity and enhanced interchange between the Luas Red and Green Line Services, proposed Metrolink Station at Fosterstown, Sligo/Maynooth Line Heavy Rail Services at Drumcondra Station and the Suburban Interchange between the Orbital and Radial Routes at Coolock Lane. It was considered that there would be insufficient demand to justify the provision of an additional light rail alternative beyond what is proposed above, particularly given the low to medium density nature of development in this corridor.

Similar to BRT, the light rail option would be worse for the environment in terms of construction impacts, including flora and fauna, heritage, air and noise, compared to the CBC proposal. Light rail requires continuous unbroken physical lane infrastructure to achieve high-priority. This would involve significantly more land take and potentially involve demolition of buildings at pinch-points. In the case of the CBC proposals, bus-priority can be achieved through short lengths at pinch-points by the use of signal-controlled priority.

Given the consideration of light rail provision, and the level of likely public passenger use along this overall corridor assessed in the transport modelling work, the development of the prior GDA Transport Strategy identified that a Metro solution would be economically justified within the area covered by this corridor. Therefore, it is intended to develop the light rail Metro system along this corridor through the implementation of MetroLink.

Arising from the various studies and analysis that had been carried out, and the specific assessment and transport modelling work undertaken for the prior GDA Transport Strategy, 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. This is because 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.

With respect to congestion charging, Section 3.2.8 of the EIAR states that a key success factor of demand management is greater use of alternative travel modes, in particular public transport. In the case of Dublin, the existing public transport system does not currently have sufficient capacity to cater for larger volumes of additional users.

In advance of a significant uplift in overall public transport capacity in the Dublin metropolitan area, the implementation of major demand management measures across that area would be unsuccessful. Effectively constraining people from making journeys by car and requiring them to use other modes, without those modes having the necessary capacity to cater for such transfer, would not deliver an effective overall transport system. Instead, the capacity of the public transport system needs to be built up in advance of, or in conjunction with, the introduction of major demand management measures in the Dublin metropolitan area. This is especially true in the case of the bus system where a major increase in bus capacity through measures such as the Proposed Scheme would be required for the successful implementation of large scale demand management initiatives.

While the foregoing addresses the dependency of demand management measures on public transport capacity, it is equally correct that the provision of greatly enhanced cycling facilities will also be required to cater for the anticipated increase in cycling numbers, both in the absence of demand management measures and, even more so, with the implementation of such measures. Demand management initiatives by themselves will not deliver the level of segregated cycling infrastructure required to support the growth in that mode. Consequently, the progression of demand management proposals will not secure the enhanced safe cycling infrastructure envisaged under the Proposed Scheme.

Finally it is noted that park and ride and cashless fares both form part of the broader BusConnects programme and may be implemented to complement improvements to the overall bus system, including the Proposed Scheme infrastructure.

vii) Construction Impacts

The objection raises a concern in relation to the damage that might be caused during the construction works and also that the scheme would cause a massive noise nuisance.

With regard to damage during the construction works, Section 9.5.1.2 of Chapter 9 Noise and Vibration of Volume 2 of the EIAR describes the likely vibration levels associated with construction activities, it is considered that the construction of the Proposed Scheme is not expected to give rise to vibration that is either significantly intrusive or capable of giving rise to structural or cosmetic damage to buildings. Vibration from construction activities will be limited to the values set out in Table 9.10 to avoid any form of potential cosmetic damage to buildings and structures. Monitoring will be undertaken at identified sensitive buildings, where proposed works have the potential to be at or exceed the vibration limit values in Table 9.10 - Recommended Construction Vibration Thresholds for Buildings.

Section 9.4.4.2 of EIAR Volume 2 Chapter 9 Noise and Vibration considers the operational vibration impact of the Proposed Scheme. Analysis of traffic data for the Proposed Scheme indicates a reduction in overall AADT traffic flows along the core bus corridor. Reference to the monitoring results in Table 9.26 and Table 9.27 of Chapter 9 confirms that vibration levels associated with passing buses and other vehicular traffic at distances of 2.5 to 10m from the road edge are negligible in terms of human perception and building response. Vibration levels associated with a passing bus were recorded at 0.1mm/s PPV or less under the monitored scenarios. These values are below the normal range of perceptible human response to vibration and would not pose any significant impact.

Regarding the noise impact of the Proposed Scheme, Section 9.4.4.1 of EIAR Volume 2 Chapter 9 Noise and Vibration provides details of the assessment undertaken for the Operational Phase of

the Proposed Scheme in respect of the potential noise and vibration impacts associated with altered traffic flows, realigned traffic lanes and displaced traffic flows.

Section 9.4.4.1.1.5 states that '*Along the majority of roads of the Proposed Scheme within the 1km study area, impacts as a result of traffic redistribution are determined to be Indirect, Positive, Imperceptible to Slight to Moderate, and Short to Medium Term to Negative, Moderate, and Short to Medium term once the Proposed Scheme becomes operational*.' It goes on to state that '*There are a small number of roads in the overall study area where there are potential initial significant impacts. These are defined as roads with a traffic noise level above a daytime noise level of 55 dB LAeq,16hr an increase in noise level greater than 3 dB*.' Table 9.45 lists these roads and Swords Road is not included in Table 9.45.

Section 9.5.2.1 summarises the change in road traffic noise in the operation phase as follows: *'The impact assessment has determined that there are no calculated significant direct or indirect traffic noise impacts across the study area for the Proposed Scheme. The range of noise level changes and overall noise levels calculated do not require any specific noise mitigation measures to be incorporated into the Proposed Scheme.'*

In respect of electric buses, as discussed in Section 9.4.4.1.1.4 of Chapter 9, during the proposed Opening Year (2028), the NTA forecast is for 94% of the city bus fleet to be EVs or HEVs. For the Design Year (2043), the city bus fleet is forecast to be 100% electric. The operation of electric and hybrid buses will eliminate ICE noise from buses accelerating, decelerating and idling at bus stops which is the dominant noise source.

In addition, the characteristic of noise from EVs is subjectively less intrusive compared to those with ICE's and is masked to a much greater extent by surrounding road traffic. It is noted the bus stops along the Proposed Scheme will be used by other bus operators which may not transition to EV and HEVs over the same period as the city bus fleet. The volume of these buses along the Proposed Scheme will, however, be significantly less than the city bus fleet and hence, noise levels associated with these areas will not generate significant noise levels over the prevailing noise environment.

With respect to construction noise impacts, as noted in Figure 9.3 in Volume 3 of the EIAR, a Slight – Moderate noise impact is forecast along Swords Road through Santry Village.

The EIAR contains a comprehensive set of mitigation measures to minimise construction phase impacts, including noise impacts. Construction noise mitigation measures are set out in Chapter 9 in Volume 2 of the EIAR (and are also summarised in Appendix 5.1 (Construction Environmental Management Plan) in Volume 4 of the EIAR).

Section 9.5.1.1 of EIAR Volume 2 Chapter 9 states that: *'The appointed contractor will be required to take specific noise abatement measures to the extent required and comply with the recommendations of BS 5228–1 (BSI 2014a) and S.I. No. 241/2006 - European Communities (Noise Emissions by Equipment for Use Outdoors) (Amendment) Regulations 2006.'* It also states that '*During the Construction Phase, the appointed contractor will be required to manage the works to comply with the limits detailed in Section 9.2.4.1 using methods outlined in BS 5228–1 (BSI 2014a)*'

Section 9.5.1.1 also states that *'BS 5228–1 includes guidance on several aspects of construction site practices, which include, but are not limited to:*

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

Specifically, Section 9.5.1.1. states that *'The appointed contractor will put in place the most appropriate noise control measures depending on the level of noise reduction required at individual working areas (i.e. based on the construction threshold values for noise and vibration set out in Table 9.8: and Table 9.11).'* [Note - Table 9.8 of Section 9.2.4.1 of EIAR Chapter 9 sets out the Construction Noise Threshold (CNT) Levels for the Proposed Scheme].

Section 9.5.1.1.4 of Chapter 9 sets out the proposed working hours and states: *'It is envisaged that generally construction working hours will be between 07:00hrs and 23:00hrs on weekdays, and between 08:00hrs and 16.30hrs on Saturdays. Night-time and Sunday working will be required during certain periods to facilitate street works that cannot be undertaken under daytime / evening time conditions.'*

However, the contractor will also have to take account of sensitive receptors (in particular any nearby residential areas). Section 9.5.1.1.4 goes on to state: '*The planning of such works will take consideration of sensitive receptors, in particular any nearby residential areas. Construction activities will be scheduled in a manner that reflects the location of the site and the nature of neighbouring properties. Construction activities / plant items will be considered with respect to their potential to exceed construction noise thresholds at NSLs and will be scheduled according to their noise level, proximity to sensitive locations and possible options for noise control. In situations where an activity with potential for exceedance of construction noise thresholds is scheduled (e.g. road widening and utility diversions or activities with similar noise levels identified in Table 9.42), other construction activities will be scheduled to not result in significant cumulative noise levels'.*

In summary the noise abatement measures set out in the EIAR that the appointed contractor will be required to put in place to comply with the limits detailed in Section 9.2.4.1 using methods outlined in BS 5228–1 will result in appropriate and adequate mitigation measures in respect of construction noise impact at this location during construction.

The objection also raises concerns that there will be an increase in vermin due to the construction works. Appendix A5.1 (Construction Environmental Management Plan (CEMP)) in Volume 4 Part 1 of the EIAR sets out the management framework for the delivery of the proposed construction works. As outlined in Section 5.1.1.2 of the CEMP, '*The appointed contractor will need to comply with all relevant environmental legislation and take account of published standards, accepted industry practice, national guidelines, and codes of best practice appropriate to the Proposed Scheme*'. Section 5.5 of the CEMP is the '*Construction and Demolition Resource and Waste Management Plan*' which details the requirements for waste management during construction.

viii) Information request (Policy)

The Transport Strategy for the Greater Dublin Area 2022-2042 (hereafter described as the GDATS) was published for consultation on the 9 November 2021 and has been prepared in accordance with Section 12 of the Dublin Transport Authority Act 2008 (as amended). It was adopted in January 2023 and replaces the previous Transport Strategy for the Greater Dublin Area 2016 – 2035. Under the Dublin Transport Authority Act 2008, the NTA must review its Transport Strategy every six years. The GDATS is considered to be an essential component for the orderly development of the GDA for the next 20 years. The overall aim of the strategy is *'To provide a sustainable, accessible and effective transport system for the Greater Dublin Area which meets the region's climate change requirements, serves the needs of urban and rural communities, and supports the regional economy'*. A key focus of the strategy is to enable increased use of other transport modes to meet environmental, economic and social objectives related to emissions, congestion and car dependency. It sets a clear direction towards a 50% reduction in CO2 emissions within the GDA area by 2030. The Transport Strategy report and background documents can be downloaded from the following website:

https://www.nationaltransport.ie/planning-and-investment/strategic-planning/greater-dublin-area-transport-strategy/ .

This includes a link to the Strategic Environmental Assessment which was conducted as part of that process. This GDATS was subject to its own public consultation process.

The GDATS sets out a range of measures and those of relevance to the Proposed Scheme are outlined in Table 2.5. The GDA Transport Strategy 2022 - 2042 (NTA 2022) puts the delivery of Dublin BusConnects, of which the Proposed Scheme is part, at the heart of its objectives. There is added emphasis on the delivery of public transport, active travel and enhanced accessibility to sustainable modes of transport, all of which the Proposed Scheme will help to deliver.

Table 2.5 GDA Transport Strategy 2022 – 2042 Measures

Measure Number	Measure	How the Proposed Scheme meets the Measure
PLAN2 – The Road User Hierarchy	*The NTA, in the decision-making process around the design, planning and funding of transport schemes*	The Proposed Scheme aligns with the measure as it will promote modal shift from private car to a

Measure Number	Measure	How the Proposed Scheme meets the Measure
	in the GDA, will be guided by the priority afforded to each mode in the Road User Hierarchy as set out in the Transport Strategy.'	more sustainable forms of transport. It enhances active travel networks and thus encourages the use of these modes reducing reliance on the private car.
PLAN14 - Urban Design in Major Infrastructure Projects	*'The NTA will incorporate a high standard of urban design and placemaking, taking into account architectural heritage, into the planning and design of all major public transport infrastructure schemes and will consider how greater biodiversity can be fostered.'*	The overall landscape and public realm design strategy for the Proposed Scheme aims to create attractive, consistent, functional and accessible places for people alongside the core bus and cycle facilities. In addition, opportunities have been sought to enhance the public realm and landscape. As part of the Proposed Scheme public realm improvements are proposed at several locations. For example, the Drumcondra Road Upper shopping parade is identified as a local enhancement opportunity to improve the image of the public realm, this includes footway enhancements and upgrades to the parking bays. Similarly, the area in front of The Comet in Santry is proposed to have surface treatment enhancements and de-cluttering and reorganising of the street furniture. All the plants and trees selected will be native species, appropriate to the location. 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.
Measure PLAN15 – Urban Design in Walking and Cycling Projects	*'In the design, planning and prioritisation of walking and cycling schemes, the NTA and the local authorities will ensure the incorporation of urban design and placemaking considerations, taking into account architectural heritage, and will consider how greater biodiversity could be fostered.'*	The overall landscape and public realm design strategy for the Proposed Scheme aims to create attractive, consistent, functional, and accessible places for people alongside the core bus and cycle facilities. Along the route of the Proposed Scheme, improvements and enhancements will be made to footpaths, walkways, and pedestrian crossings. Additional landscaping and outdoor amenities will be provided to improve the local urban realm.
Measure PLAN16 – Reallocation of Road Space	*'The NTA, in conjunction with the local authorities, will seek the reallocation of road space in appropriate locations in Dublin City Centre, Metropolitan towns and villages, and towns and villages across the GDA in accordance with the road user hierarchy, in order to prioritise walking, cycling and public transport use and prioritise the placemaking functions of the urban street network.'*	The Proposed Scheme will support integrated sustainable transport usage through road space reallocation in support of infrastructure improvements for active travel (both walking and cycling), and the provision of enhanced bus priority measures for existing (both public and private) and all future services who will use the corridor. The Proposed Scheme reallocates road space along the route to facilitate full and continuous bus lanes along the north and south quays.
Measure INT3 – Integration of all Modes in Transport Schemes	*'It is the intention of the NTA, in the design and planning of transport schemes, to ensure that the needs of all transport modes are considered, as appropriate, based on the objectives of the scheme and on the road user hierarchy.'*	The Proposed Scheme aligns with the measure as it will service the current and future transport needs of Dublin. It enhances active travel networks and thus encourages the use of these modes reducing reliance on the private car.
Measure INT6 - Interchange	*'It is the intention of the NTA, in conjunction with local authorities and transport operators, to ensure that passengers wishing to change between services on the transport network are provided with a safe, convenient and seamless interchange experience.'*	The Proposed Scheme aligns with the measure as it will enhance the interchange between the various modes of public transport operating in the city and wider metropolitan area, both now and in the future. The design has been developed with this in mind and, in so far as possible, is seeking to provide for improved existing or new interchange opportunities with other transport services. These include: • Existing and future Dublin Bus services at numerous locations along the route; • Future bus service proposals including Spine A associated with the New Dublin Area Bus Network; • MetroLink high-frequency rail line running from Swords to Charlemont linking Dublin Airport, Irish Rail, DART and Luas services; • Greater Dublin Area Cycle Network Plan (GDACNP);

Measure Number	Measure	How the Proposed Scheme meets the Measure
		• Future public transport proposals such as DART Plus scheme at Drumcondra; • Interface with New Dublin Area Bus Network; • Griffith Avenue Protected Cycle Lane Scheme; • Santry River Greenway; and • Royal Canal Greenway.
Measure INT19 – Travelling at Night	*'The NTA will work with transport operators, local authorities and An Garda Síochána to improve security and perceptions of security for people using public transport, and walking and cycling at night by improving lighting at public transport stops and stations and along access points to and from stops, assisting local authorities to design in passive surveillance and high quality lighting along pedestrian routes, and to reduce anti-social behaviour around stops and stations.'*	The Proposed Scheme has considered security and safety in its design, and it provides lighting as appropriate to the end use. The Proposed Scheme will include upgrades to existing public lighting. In addition to public lighting, it is proposed to install traffic monitoring cameras at key locations to enable the monitoring of traffic flows along the Proposed Scheme and provide rapid identification of any events that are causing, or are likely to cause, disruption to bus services on the route and to road users in general.
Measure INT20 – Accessible Infrastructure	*'During the period of the Transport Strategy, the NTA will ensure that public transport infrastructure, and facilities in the GDA are made accessible for all users, and that additional resources for the maintenance and repair of lifts are made available.'*	The Proposed Scheme has been designed to include: • More bus shelters, seating, accessible footways and bus infrastructure to make the bus transit experience more accessible for users of all abilities and ages; and • Provision and enhancement of cycling facilities along the Proposed Scheme, creating routes that are safe, accessible and attractive for people of all abilities and ages.
Measure INT25 – Construction Management	*The NTA, in conjunction with the local authorities, TII, Irish Rail, and other agencies will ensure that the level of disruption to the transport system and to wider activity throughout the region will be minimized, and that up-to-date travel information is provided during the construction of transport infrastructure projects.*	The Construction Travel Management Plan (CTMP) of the Proposed Scheme will help to ensure that disruption is minimised, with access to houses and businesses maintained.
Measure WALK2 – Improved Footpaths	*The NTA, in conjunction with local authorities, will implement footpath improvement schemes across the GDA where required throughout the period of the Transport Strategy in order to ensure that they are of sufficient width, adequately lit, serve both sides of the road in urban areas (in most cases), are of good quality surfacing, provide for seating at appropriate locations, and are free of unnecessary clutter.* *Footpaths will also be maintained and improved in a manner which contributes positively to the public realm.*	Along the Proposed Scheme improvements and enhancements will be made to footpaths, walkways, and pedestrian crossings. Additional landscaping and outdoor amenities will be provided to improve the local urban realm. Several urban realm upgrades, including widened footpaths, high quality hard and soft landscaping and street furniture will be provided in areas of high activity to contribute towards a safer, more attractive environment for pedestrians.
Measure WALK4 – Improved Junctions	*'The NTA, in conjunction with local authorities, will implement junction improvements across the GDA as follows:* *• To enhance safety at junctions, a programme of "narrowing" junctions by reducing kerb-line radii will be undertaken as a means of managing vehicular speeds; and* *• To enhance movement by pedestrians and cyclists, a programme of removal of slip lanes will be undertaken at appropriate locations, together with consideration of junction signaling changes to better balance the use of the junction between motorised and vulnerable modes, and in urban areas, junctions will be designed so as footpaths on side roads will be carried through at-grade, where practicable and safe to do so.'*	The Proposed Scheme provides infrastructure that will support sustainable transport and will improve the safety of road users through junction improvement and the segregation of road vehicles and active travel modes, where possible. The design of each junction has given priority to pedestrian, cycle and bus movements. Junctions have been designed to ensure a high level of comfort and priority for sustainable modes of travel e.g. walking, cycling and public transport by prioritising the space and time allocated to these modes within the operation of a junction.
Measure WALK9 – Disabled People	*'Local authorities in the GDA and the NTA will take full account of disabled people and pedestrians with mobility impairments when delivering transport schemes which affect the pedestrian environment; and will implement improvements to existing facilities where appropriate and encourage the enforcement of the Road Traffic Laws in this regard.'*	A Disability Audit of the existing environment and proposed draft preliminary design for the corridor was undertaken. The Audit provided a description of the key accessibility features and potential barriers to disabled people based on the Universal Design standards of good practice. The Audit was undertaken in the early design stages with the view to implementing any key measures identified as part of the design development process. This

Measure Number	Measure	How the Proposed Scheme meets the Measure
		audit has informed the design of the Proposed Scheme. The audit assessed footpaths, crossings / junctions, bus stops, parking and access for users with disabilities. Traffic signal layout design included accessibility considerations for the mobility impaired. Potential areas of conflict with other non-motorised users were considered to provide suitable separation where possible. It has been designed to include: • The interaction between pedestrians, cyclists, and buses at bus stops. The Proposed Scheme has prioritised the use of island bus stops, including signal call button for crossing of cycle tracks, to manage the interaction between the various modes with the view to providing a balanced safe solution for all modes; and • Clear segregation of modes at key interaction points along the Proposed Scheme which was highlighted as a potential mobility constraint in the Audit.
Measure CYC1 – GDA Cycle Network	*'It is the intention of the NTA and the local authorities to deliver a safe, comprehensive, attractive and legible cycle network in accordance with the updated Greater Dublin Area Cycle Network.'*	The Proposed Scheme aligns with the policy objective as it provides of segregated cycling facilities along the Proposed Scheme in both directions. These high-quality cycle track will generally be 2m in width offering a high level of service and help to reduce dependency on private car use for short journeys.
Measure CYC5 – Cycle Parking	*It is the intention of the NTA to deliver, through the statutory planning process and liaison with relevant stakeholders, high quality cycle parking at origins and destinations, serving the full spectrum of cyclists including users of non-standard cycles.*	Cycle parking is provided in a number of locations throughout the Proposed Scheme such as at some bus stop locations, where space is available.
Measure CYC14 – Supporting Measures for Cycling	*'The NTA will monitor new developments related to supporting measures for cycling including emerging technologies, infrastructure, policies and programmes, with a view to their implementation in the GDA.'*	The Proposed Scheme has been designed in line with guidance documents and design standards relating to the design of urban streets, cycling facilities and urban realm.
Measure PT2 – Climate Proofing New Public Transport Infrastructure	*'The NTA will ensure that all new public transport infrastructure is proofed for resilience against the potential impacts arising from climate change.'*	The Proposed Scheme aligns with the measure as it comprises transport infrastructure that supports the delivery of an efficient, low carbon and climate resilient public transport service. Design principles included exploring opportunities for sustainable urban realm and landscape design responses such as SuDS, species rich planting and reusing materials, where possible. SuDS measures were designed to attenuate runoff for any newly paved areas. SuDS measures were designed to provide sufficient storage to ensure no increase in existing runoff rates.
Measure BUS1 – Core Bus Corridor Programme	*'Subject to receipt of statutory consents, it is the intention of the NTA to implement the 12 Core Bus Corridors as set out in the BusConnects Dublin programme.'*	The Proposed Scheme is part of the BusConnects programme to enhance bus services and active travel options in the Greater Dublin Area.
Measure BUS12 – New Bus Stops and Shelters	*'It is the intention of the NTA to continue to roll-out the programme of bus stop and shelter provision, and to monitor potential for further expansion and upgrade during the lifetime of the strategy.'*	The Proposed Scheme includes additional bus shelters, seating, accessible footways and bus infrastructure to make the bus transit experience more accessible for users.
Measure ROAD13 – Roadspace Reallocation	*'The local authorities and the NTA will implement a programme of road space reallocation from use by general traffic or as parking to exclusive use by sustainable modes as appropriate, as a means of achieving the following:* • *Providing sufficient capacity for sustainable modes;* • *Improving safety for pedestrians and cyclists; and* • *Encouraging mode shift from the private car and reducing emissions'.*	The Proposed Scheme reallocates road space for bus priority and cycling infrastructure. It will provide the infrastructure to deliver a modal shift from private car usage to sustainable transport.

Measure Number	Measure	How the Proposed Scheme meets the Measure
Measure TM2 – Management of Urban Centres	*'The NTA and relevant local authorities, in collaboration, will deliver the public transport, cycling and walking networks, and public realm that are required to serve local centres, and to facilitate a post-Covid recovery based on sustainable transport.'*	The Proposed Scheme aligns with the measure as it will support sustainable transport modes through infrastructure improvements for active travel (both walking and cycling). The Proposed Scheme will bring greater accessibility to the city centre and other strategic areas for people to avail of housing, jobs, amenities and services. It aims to mitigate any adverse effects that the proposals may have on the streets, spaces, local areas and landscape through the use of appropriate design responses. In addition, opportunities have been sought to enhance the public realm and landscape design where possible.
MEASURE CLIMATE3	*Through the implementation of the full measures set out in this strategy, in combination with the plans and programmes of Government, the NTA will contribute to a reduction in CO2 emissions from transport in the GDA to below 1 MtCO2eq by 2042.*	The Proposed Scheme aligns with the objective through the development of transport infrastructure that supports the delivery of an efficient, low carbon and climate resilient public transport service. A greater increase in sustainable mode share will in turn lead to further reductions in GHG emissions, beyond those reported in the assessment. The Proposed Scheme has the potential to reduce GHG emissions equivalent to the removal of approximately 21,130 and 22,150 car trips per weekday from the road network in 2028 and 2043 respectively. This represents a significant contribution towards the national target of 500,000 additional trips by walking, cycling and public transport per day by 2030 as outlined as a target in the Government's 2021 Climate Action Plan.

This objection suggests that the Board should request Further Information and revised plans from the applicant. As stated in Chapter 1 Introduction of the EIAR, the EIAR is defined by the Environmental Protection Agency (EPA) Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (hereinafter referred to as the EPA Guidelines) as '*a report of the effects, if any, which proposed development, if carried out, would have on the environment and shall include the information specified in Annex IV of the Environmental Impact Assessment Directive*' (EPA 2022). The EIAR details the consideration of reasonable alternatives, consideration and assessment of likely significant impacts, mitigation, and avoidance measures to reduce significant adverse impacts, and an assessment of residual impacts. The Swords to City Centre scheme EIAR has been completed in accordance with all applicable legislation and all relevant guidance documents and will facilitate An Bord Pleanála (ABP) in undertaking an EIA for the Proposed Scheme under the EIA Directive1 and Section 50 of the Roads Act 1993, as amended by S.I. No. 279/2019 – European Union (Roads Act 1993) (Environmental Impact Assessment) (Amendment) Regulations 2019 (hereafter referred to as the Roads Act).

viii) Loss of Flora

The removal/relocation of particular plants can be agreed with the property owner as part of the accommodation works. Chapter 5 (Construction) in Volume 2 of the EIAR states the following with respect to land acquisition and boundary treatment (Section 5.5.2.1):

'*Any lands acquired temporarily to facilitate construction work will be returned to landowners on completion of the works. Existing boundary walls or fencing being relocated will be constructed to match the existing conditions, unless otherwise agreed. The removal of trees, vegetation, lawns, paving etc. will be minimised in so far as practicable*'.

Section 5.5.3.10 of Chapter 5 is on the subject of landscaping and states '*Where vegetation, grassed areas and hedgerows are disturbed during the works, these will be reinstated, and replaced, where practicable. New trees will be planted, in suitable tree pits, where necessary, at various locations as shown in the Landscaping General Arrangement Drawings (BCIDB-JAC-ENV_LA-0002_XX_00-DR-LL-9001) in Volume 3 of this EIAR*'.

Chapter 17 (Landscape (Streetscape) & Visual) in Volume 2 of the EIAR includes the following mitigation measures in Section 17.5.1 with respect to the impacts of land acquisition:

- '*Where properties are subject to permanent and/or temporary acquisition (as listed in Section 17.4.3.2.8 and Section 17.4.4.2.8), an inventory of boundary details and accesses, planting, paving, and other features that may be disturbed or removed will be prepared by the appointed contractor prior to commencement of construction works*'; and

- '*Where properties are subject to permanent and/or temporary acquisition (as listed in Section 17.4.3.2.8 and Section 17.4.4.2.8), appropriate measures will be put in place by the appointed contractor to provide for protection of features, trees and vegetation to be retained, and for continued access during construction and for adequate security and screening of construction works. All temporary acquisition areas will be fully decommissioned and reinstated at the end of the Construction Phase or at the earliest time after the reinstatement works are completed to the satisfaction of the NTA*'.

Fauna and Flora is assessed in Chapter 12 Biodiversity in Volume 2 of the EIAR. Natural Heritage Areas (NHAs) and Proposed Natural Heritage Areas (pNHAs) are designations under section 18 of the Wildlife (Amendment) Act to protect habitats, species or geology of national importance. These are listed in Table 12.9 of Chapter 12 and illustrated in Figure 12.4 in Volume 3 of the EIAR. 268 Swords Road does not fall within any NHAs nor pNHAs.

The non-Fossitt classification of 'residential' is used to '*represent residential properties along the Proposed Scheme corridor and generally consists of a mosaic of buildings and artificial surfaces (BL3), amenity grassland (GA2), flower beds and borders (BC4), ornamental shrubs (WS3) and hedgerows (WL1)*' as defined in Section 12.3.5.14 of Chapter 12. This habitat type was commonly encountered and was present across the entire scheme (illustrated in Figure 12.5 in Volume 3 of this EIAR). This habitat type is of Local Importance (Lower Value). Section 12.4.3.2.1 and Table 12.6 in Chapter 12 provides the estimated extent of total habitat loss across the Proposed Scheme. The loss of habitats outside of designated areas for nature conservation is assessed as being a 'Likely significant effect at the local geographic scale' during the Construction Phase as set out in Table 12.19 in Chapter 12. Mitigation against the impact of habitat loss across the Proposed Scheme is stated in Section 12.5.1.2.1 of Chapter 12 and includes:

- '*Where practicable, areas of vegetation, including habitats of Local Importance (Higher Value), such as mixed broadleaved woodland, mixed broadleaved conifer woodland, scattered trees and parkland, immature woodland, treeline and hedgerow habitat types) which lie within the footprint, or along the boundary of the Proposed Scheme, will be retained*'; and

- '*To mitigate the loss of habitat, proposed planting incorporated into the Proposed Scheme will be implemented by the appointed contractor*'.

2.4 Swords Road (Properties 254 and 256) – CPO-04 and CPO-18

2.4.1 Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor, it is proposed to provide a footpath, bus lane and general traffic lane in each direction. It is proposed to redirect cyclists through Lorcan Road and Shanrath Road as a Quiet Street.

The existing road cross section in this location provides a footpath on each side of the road with one general traffic lane and advisory cycle lane in each direction.

In order to achieve the required cross section of the Proposed Scheme land acquisition is necessary from private properties along this section of Swords Road. As described in Section 4.5.3.1 of Chapter 4 of Volume 2 of the EIAR, the cross-section proposed has been designed so as to minimise the extent of necessary land acquisition.

The land take required is shown in the following:

- relevant extract of the EIAR Volume 3 Chapter 4 Proposed Scheme Description Figures, General Arrangement drawings in Figure 2.16.
- and the existing aerial view in Figure 2.17.

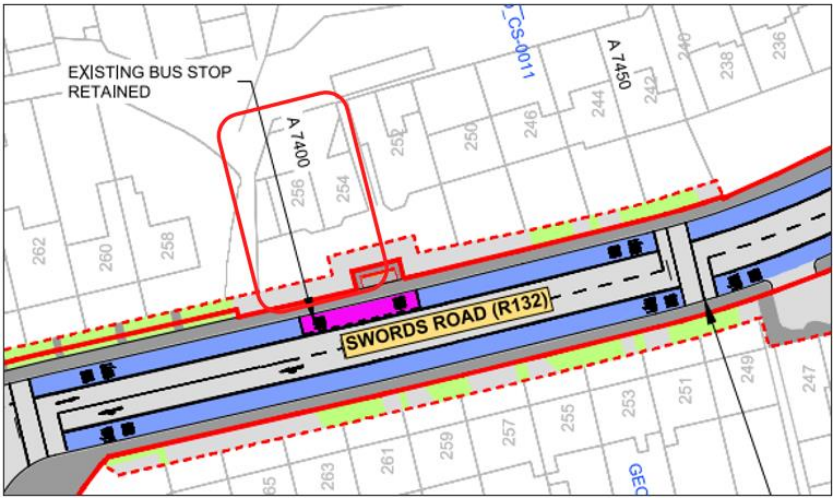

Figure 2.16 Proposed New Layout at Swords Road

Figure 2.17 Existing Aerial View on Swords Road

Objections CPO-04 and CPO-18, which relate to two separate CPO plots that are adjacent to each other, are responded to individually below.

CPO-04 – Anne Doyle

Summary of Objections Raised

The objection to the CPO raises five potential issues:

i) Roadworks/Impact to Business

The objection notes that the roadworks will negatively impact the therapy centre and envisages having to close the business for the entire period of time the road works and related activities are ongoing in Santry.

ii) Loss of Parking Space

The objection considers that the clients greatly value the ability to park outside the centre, and often have impairment of physical mobility, recovering from trauma or are in abusive relationships. The ability to park outside helps them to attend in safety.

iii) Returning to the Therapy Centre (Accommodation Works)

The objection considers that all costs related to returning to the therapy centre to use after the BusConnects roadworks must be met by the BusConnects project.

A number of items are listed such as cleaning, repainting, signage refreshed, new door for sound insulation, etc.

iv) Reduction in Property Value/ Loss of Rent/ Therapy Practice Income

The land permanently acquired by BusConnects is considered by the respondent to impact the business and reduce the value of the property for resale.

Rent income may be lost from the therapists and own practices may be impacted. Possibility therapists will not return after going through upheaval of a move to their new location. Likely result in loss of clients who are disinclined or unable to travel to new location.

Consideration that all therapists working in the practice should be compensated for disruption to therapy work and client loss associated with moving their therapy practice location.

Response to Objections Raised

i) Roadworks/Impact to Business

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 Section 5.5.3.2 of Chapter 5 Construction of Volume 2 of the EIAR, '*details regarding temporary access provisions will be discussed with residents and business owners prior to construction starting in the area. The duration of the works will vary from property to property, but access and egress will be maintained at all times*'.

Chapter 10 (Population) in Volume 2 of the EIAR includes an assessment of the impact on commercial properties as a result of land take during both the Construction Phase (Section 10.4.3.2.2.1) and the Operational Phase (Section 10.4.4.2.2.1). The commercial properties which were assessed are listed in the Chapter's Appendix A10.1 (Schedule of Commercial Businesses) in Volume 4 Part 3 of the EIAR, of which the Holistic Therapy Centre in Santry is entry number 73. The facility was not assessed as being significantly impacted by either the construction or operation of the Proposed Scheme as summarised in the aforementioned sections. The impact of land take on commercial receptors across the Larkhill – Whitehall – Santry community area as a whole is considered Negative, Slight and Temporary/Short-Term during the Construction Phase.

With respect to construction noise impacts, as noted in Figure 9.3 in Volume 3 of the EIAR, a Slight – Moderate noise impact is forecast along Swords Road through Santry Village.

The EIAR contains a comprehensive set of mitigation measures to minimise construction phase impacts, including noise impacts. Construction noise mitigation measures are set out in Chapter 9 in Volume 2 of the EIAR (and are also summarised in Appendix 5.1 (Construction Environmental Management Plan) in Volume 4 of the EIAR).

Section 9.5.1.1 of EIAR Volume 2 Chapter 9 states that: *'The appointed contractor will be required to take specific noise abatement measures to the extent required and comply with the recommendations of BS 5228–1 (BSI 2014a) and S.I. No. 241/2006 - European Communities (Noise Emissions by Equipment for Use Outdoors) (Amendment) Regulations 2006.'* It also states that '*During the Construction Phase, the appointed contractor will be required to manage the works to comply with the limits detailed in Section 9.2.4.1 using methods outlined in BS 5228–1 (BSI 2014a)*'

Section 9.5.1.1 also states that *'BS 5228–1 includes guidance on several aspects of construction site practices, which include, but are not limited to:*

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

Specifically, Section 9.5.1.1. states that *'The appointed contractor will put in place the most appropriate noise control measures depending on the level of noise reduction required at individual working areas (i.e. based on the construction threshold values for noise and vibration set out in Table 9.8: and Table 9.11).'* [Note - Table 9.8 of Section 9.2.4.1 of EIAR Chapter 9 sets out the Construction Noise Threshold (CNT) Levels for the Proposed Scheme].

Section 9.5.1.1.4 of Chapter 9 sets out the proposed working hours and states: *'It is envisaged that generally construction working hours will be between 07:00hrs and 23:00hrs on weekdays, and between 08:00hrs and 16.30hrs on Saturdays. Night-time and Sunday working will be required during certain periods to facilitate street works that cannot be undertaken under daytime / evening time conditions.'*

However, the contractor will also have to take account of sensitive receptors (in particular any nearby residential areas). Section 9.5.1.1.4 goes on to state: '*The planning of such works will take consideration of sensitive receptors, in particular any nearby residential areas. Construction activities will be scheduled in a manner that reflects the location of the site and the nature of neighbouring properties. Construction activities / plant items will be considered with respect to their potential to exceed construction noise thresholds at NSLs and will be scheduled according to their noise level, proximity to sensitive locations and possible options for noise control. In situations where an activity with potential for exceedance of construction noise thresholds is scheduled (e.g. road widening and utility diversions or activities with similar noise levels identified in Table 9.42), other construction activities will be scheduled to not result in significant cumulative noise levels'.*

In summary the noise abatement measures set out in the EIAR that the appointed contractor will be required to put in place to comply with the limits detailed in Section 9.2.4.1 using methods outlined in BS 5228–1 will result in appropriate and adequate mitigation measures in respect of construction noise impact at this location during construction.

The operational ability of the business remains unchanged and the arrangement of how vehicles access the business is not affected by the Proposed Scheme. Therefore, it is not envisaged that the Proposed Scheme will impact on business operations.

ii) Loss of Parking Space

Section 6.4.6.1.4.4 of Chapter 6 Traffic and Transport of Volume 2 of the EIAR, details the impact of the operational phase of the Proposed Scheme on the parking and loading in the vicinity of this business.

The proposed works will modify the existing car park of the business to facilitate a tie-in. As a result of widening of the existing corridor to facilitate a traffic lane, bus lane and footpath in both directions,

the Proposed Scheme will encroach towards business by approximately 1.5m, however the number of permanent parking spaces will not be impacted by the Proposed Scheme.

The Proposed Scheme will require reconfiguration of the existing parking arrangement to continue to provide 4 parking spaces as per the existing arrangement. The exact details of any reconfiguration required during construction and in the permanent situation will be discussed with the landowner prior to the commencement of any works.

iii) Returning to the Therapy Centre (Accommodation Works)

Reinstatement of property frontage including boundary walls, gates, railings, driveway, footpath and landscaping will be on a like for like basis and detailed accommodation works plans will be prepared in consultation with landowners in line with any formal agreements and in accordance with any embedded mitigations identified in the EIAR or conditions/modifications from An Bord Pleanála in relation to the Proposed Scheme application.

Regarding the noise impact of the Proposed Scheme, Section 9.4.4.1 of EIAR Volume 2 Chapter 9 Noise and Vibration provides details of the assessment undertaken for the Operational Phase of the Proposed Scheme in respect of the potential noise and vibration impacts associated with altered traffic flows, realigned traffic lanes and displaced traffic flows.

Section 9.4.4.1.1.5 states that '*Along the majority of roads of the Proposed Scheme within the 1km study area, impacts as a result of traffic redistribution are determined to be Indirect, Positive, Imperceptible to Slight to Moderate, and Short to Medium Term to Negative, Moderate, and Short to Medium term once the Proposed Scheme becomes operational*.' It goes on to state that '*There are a small number of roads in the overall study area where there are potential initial significant impacts. These are defined as roads with a traffic noise level above a daytime noise level of 55 dB LAeq,16hr an increase in noise level greater than 3 dB*.' The roads are listed in Table 9.45, however Swords Road is not included.

Section 9.5.2.1 summarises the change in road traffic noise in the operation phase as follows: '*The impact assessment has determined that there are no calculated significant direct or indirect traffic noise impacts across the study area for the Proposed Scheme. The range of noise level changes and overall noise levels calculated do not require any specific noise mitigation measures to be incorporated into the Proposed Scheme*'.

In respect of electric buses, as discussed in Section 9.4.4.1.1.4 of Chapter 9, during the proposed Opening Year (2028), the NTA forecast is for 94% of the city bus fleet to be EVs or HEVs. For the Design Year (2043), the city bus fleet is forecast to be 100% electric. The operation of electric and hybrid buses will eliminate ICE noise from buses accelerating, decelerating and idling at bus stops which is the dominant noise source.

In addition, the characteristic of noise from EVs is subjectively less intrusive compared to those with ICE's and is masked to a much greater extent by surrounding road traffic. It is noted the bus stops along the Proposed Scheme will be used by other bus operators which may not transition to EV and HEVs over the same period as the city bus fleet. The volume of these buses along the Proposed Scheme will, however, be significantly less than the city bus fleet and hence, noise levels associated with these areas will not generate significant noise levels over the prevailing noise environment.

Based on the above assessment, the proposed noise levels do not merit mitigation measures at this location. The impact on business operation will be reviewed as part of the landowners claim for compensation.

iv) Reduction in Property Value/ Loss of Rent/Therapy Practice Income

With respect to property values, Chapter 10 (Population) Appendix A10.2 (Economic Impact of Core Bus Corridors) in Volume 4 Part 3 of the EIAR assesses the potential economic impact of the Core Bus Corridors, which includes consideration of the impact on property value. In Section 3 of the report, and specifically the section on 'The impact on property values', the conclusion states that:

'*The public realm improvements planned by the NTA may lead to an increase in value of both residential and retail property prices, especially in the community centres along the corridors. Evidence shows that investing in public realm creates nicer places that are more desirable for people and business to locate in, thereby increasing the value of properties in the area. The evidence suggests that all public realm improvements generate value, regardless of the size of the*

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

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation, which can include perceived loss in property value, and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage its agent / valuer in preparing, negotiating and advising on compensation.

CPO-18 – L&X Orchid Limited

Summary of Objections Raised

The objection to the CPO raises three potential issues:

i) Parking

Parking is considered to be limited and therefore provision of parking spaces for customers and staff is vital to attracting customers to the business and retaining staff.

ii) Property value

Rental value as well as market value of the commercial unit/actual property is anticipated to deteriorate significantly if the car parking spaces are acquired for the use of a bus corridor.

iii) CPO Notification

The property is the subject of a commercial charge in favour of Bank of Ireland and any such proposed acquisition resulting in devaluation of the property is considered to require the consent of the client's lender.

Response to Objections Raised

i) Parking

At this location the number of permanent parking spaces will not be impacted by the Proposed Scheme. Section 6.4.6.1.4.4 of Chapter 6 Traffic and Transport of Volume 2 of the EIAR, details the impact of the operational phase of the Proposed Scheme on the parking and loading in the vicinity of this business.

The Proposed Scheme will require reconfiguration of the existing parking arrangement to continue to provide 4 parking spaces as per the existing arrangement. The exact details of any reconfiguration required during construction and in the permanent situation will be discussed with the landowner prior to the commencement of any works.

ii) Property Value

With respect to property values, Chapter 10 (Population) Appendix A10.2 (Economic Impact of Core Bus Corridors) in Volume 4 Part 3 of the EIAR assesses the potential economic impact of the Core Bus Corridors, which includes consideration of the impact on property value. In Section 3 of the report, and specifically the section on 'The impact on property values', the conclusion states that:

'*The public realm improvements planned by the NTA may lead to an increase in value of both residential and retail property prices, especially in the community centres along the corridors. Evidence shows that investing in public realm creates nicer places that are more desirable for people and business to locate in, thereby increasing the value of properties in the area. The evidence suggests that all public realm improvements generate value, regardless of the size of the investment or the neighbourhood. Residents along the corridors will also see a measurable increase in their quality of life, with evidence showing that residents are willing to pay more for an improved public realm*.'

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation, which can include perceived loss in property value,

and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage its agent / valuer in preparing, negotiating and advising on compensation.

iii) CPO Notification

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation, which can include perceived loss in property value, and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage its agent / valuer in preparing, negotiating and advising on compensation.

2.5 Swords Road (Property 293) – CPO-03

2.5.1 Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor, it is proposed to provide a footpath, bus lane and general traffic lane in each direction. It is proposed to redirect cyclists through Lorcan Road and Shanrath Road as a Quiet Street.

The existing road cross section in this location provides a footpath on each side of the road with an advisory cycle lane outbound and one general traffic lane in each direction.

In order to achieve the required cross section of the Proposed Scheme land acquisition is necessary from private properties along this section of Swords Road. As described in Section 4.5.3.1 of Chapter 4 of Volume 2 of the EIAR, the cross-section proposed has been designed so as to minimise the extent of necessary land acquisition.

The land take required is shown in the following:

- relevant extract of the EIAR Volume 3 Chapter 4 Proposed Scheme Description Figures, General Arrangement drawings in Figure 2.18.
- and the existing aerial view in Figure 2.19

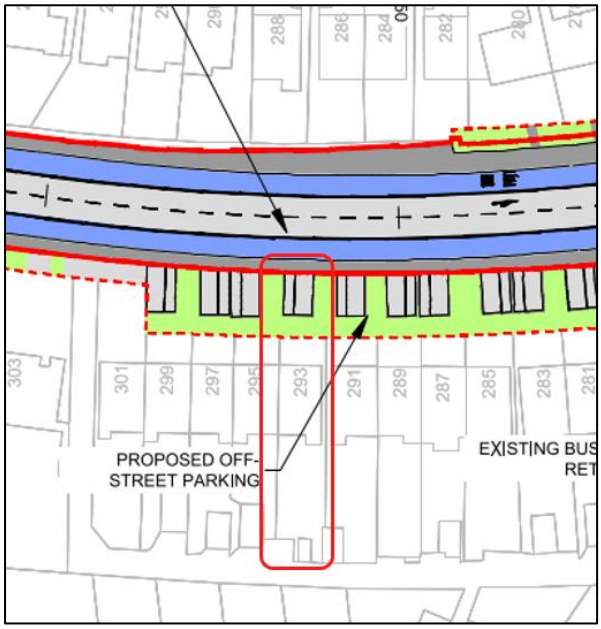

Figure 2.18 Proposed New Layout at Swords Road

Figure 2.19 Existing Aerial View on Swords Road

Summary of Objections Raised

The objection to the CPO raises two potential issues:

i) Loss of Space/Property

Only green amenity space is front garden, losing it will leave the respondent with no green amenity space which would be detriment of the residence, family and environment.

ii) Utilities

Concerns were raised there was not much detail about this project, with concerns about disruptions to gas, electricity or water supply.

Response to Objections Raised

i) Loss of Space/Property

Section 4.5.3 of Chapter 4, Volume 2 of the EIAR states that '*off-street parking is proposed at residential properties between the shopping centre and Shanowen Road to offset the loss of on-street parking.'* It is noted by the NTA that the respondents may prefer not to avail of off-street parking in their front garden. As indicated in EIAR Volume 3 Chapter 4 Proposed Scheme Description Figures, 05 Landscape General Arrangement drawings, Sheet 21, details of this parking provision is to be discussed between the landowners and the NTA during the accommodation works negotiations.

Detailed accommodation works plans will be prepared in consultation with landowners in line with any formal agreements and in accordance with any embedded mitigations identified in the EIAR or conditions/modifications from An Bord Pleanála in relation to the Proposed Scheme application.

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation, which can include perceived loss in property value, and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage its agent / valuer in preparing, negotiating and advising on compensation.

ii) Utilities

The following drawing series provide information in relation to utility services at the property as provided in EIAR Volume 3 Chapter 4 Proposed Scheme Description Figures –

14. Gas Networks Ireland Asset Alterations – Low pressure underground diversion;

15. Irish Water Asset Alterations – 101mm Cast iron watermain diversion;

16. Telecommunications Asset Alterations – eir Network diversion.,

Chapter 19 Material Assets in Volume 2 of the EIAR also provides narrative in relation to the proposed works for each of these services. As set out in Section 19.5.1.1 of Chapter 19 of the EIAR:

'*All possible precautions will be taken by the appointed contractor to avoid unplanned interruptions to any services during the Construction Phase of the Proposed Scheme. Proposed utility works are based on available records, and preliminary site investigations. Prior to excavation works being commenced, localised confirmatory surveys will be undertaken by the appointed contractor to verify the results of the pre-construction assessments undertaken and reported in this EIAR. Where works are required in and around known utility infrastructure, precautions will be implemented by the appointed contractor to protect the infrastructure from damage, in accordance with best practice methodologies and the requirements of the utility companies, where practicable. Protection measures during construction will include warning signs and markings indicating the location of utility infrastructure, safe digging techniques in the vicinity of known utilities, and in certain circumstances where possible, isolation of the section of infrastructure during works in the immediate vicinity*.'

Regarding unavoidable disruptions to utilities and service infrastructure, Section 19.5.1.1 of Chapter 19 outlines that works will be carefully planned in consultation with each utility provider, interruptions will be time-bound so far as is reasonably practicable in order to minimise service disruption and prior notification issued to impact properties.

'Where diversions, or modifications, are required to utility infrastructure (as listed in Section 19.4.3), service interruptions and disturbance to the surrounding residential, commercial and / or community property may be unavoidable. Where this is the case, it will be planned in advance by the appointed contractor. Required service interruptions will generally only occur for a set period of time per day (a set number of hours not exceeding eight hours where reasonably practicable) and will generally not be continuous for full days at a time. Prior notification will be given to all impacted properties. This notification will include information on when interruptions and works are scheduled to occur and the duration of such interruption. Any required works will be carefully planned by the appointed contractor to ensure that the duration of interruptions is minimised in so far as is practicable.'

2.6 Collinstown Business Park – CPO-05 and CPO-06

2.6.1 Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor, it is proposed to provide a 2m wide footpath, 2m wide cycle track, bus lane and general traffic lane in each direction.

The existing road cross section in this location provides a footpath on each side of the road with one general traffic lane, a bus lane and a 1.2m wide advisory cycle lane in each direction.

The existing entrance to the business park is approximately 19m wide with no pedestrian provision. The two entrance lanes are approximately 10m wide in total and the two exit lanes are approximately 9m wide. Left and right directional arrows are indicated on the exit lanes but no lane guidance markings are provided. The entrance and exit lanes are segregated with a temporary barrier.

In order to achieve the required cross section of the Proposed Scheme land acquisition is necessary from private properties along this section of Swords Road. As described in Section 4.5.2.1 of Chapter 4 of Volume 2 of the EIAR, the cross-section proposed has been designed so as to minimise the extent of necessary land acquisition.

The land take required is shown in the following:

- relevant extract of the EIAR Volume 3 Chapter 4 Proposed Scheme Description Figures, General Arrangement drawings in Figure 2.20.
- and the existing aerial view in Figure 2.21

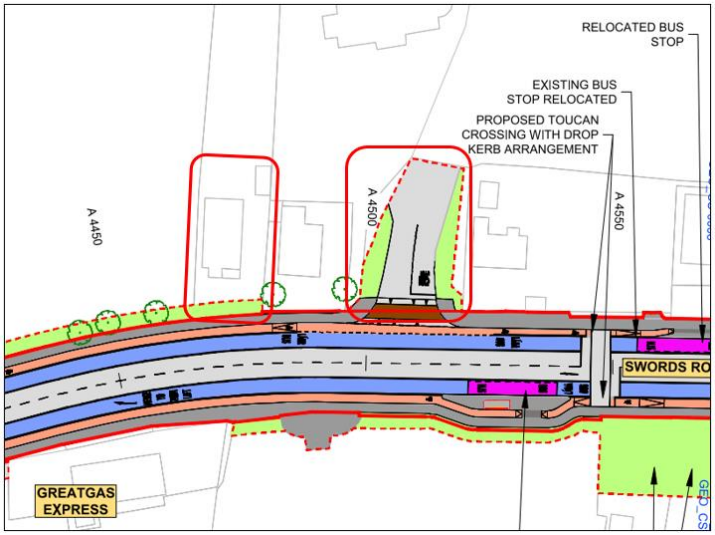

Figure 2.20 Proposed New Layout at Collinstown Business Park

Figure 2.21 Existing Aerial View on Collinstown Business Park

Objections CPO-05 and CPO-06, which relate to two separate CPO plots that are adjacent to each other, are responded to individually below. CPO-05 relates to plot 1096(1).2a while CPO-06 relates to plots 1090(1).1d and 1090(2).2d.

CPO-05 – Brendan Collins

Summary of Objections Raised

The objection to the CPO raises four potential issues and requests an oral hearing:

i) CPO Legislation – CPO Notice

NTA are considered to have failed to comply with the statutory requirements under the Housing Act 1966 (as amended) to properly set out the effect of the CPO in the Notice.

The objection also states that the Notice was served on the objector at their business premises and not at the address at which they ordinarily reside which they have claimed is in in breach of the requirements of the Housing Act 1966 (as amended).

ii) CPO Legislation – Notification Issue

This objection sets out that the NTA failed to serve a statutory notice on all of the tenants in the Business Park. The objector provided a list of tenants at Appendix 2, and also indicated that a number of houses where members of his family reside would also have an interest in this plot of land and were not served with notices either.

iii) Criticisms of the EIAR

This objection describes the information contained in the EIAR as "extremely limited". The objection explains in some detail how this entrance is required for extensive HGV and bus/coach movements and alleges that this was not properly assessed in the EIAR. The objector also appends a report prepared by Stephen Reid Consulting Traffic and Transportation Limited which alleges that there will be a devastating impact on the business park which could render it inoperable. The report also says that the impacts have not been properly assessed in the EIAR.

The objection further comments that permanent works proposed will result in a revised access layout with substantially reduced access width. Therefore, the proposed revised access layout was considered by the objector to be unsuitable for the business park and individuals / business who rely on this access route every day. A traffic report included as an appendix to the submission recommended an alternative signal controlled junction to improve safety for the frequent movements of larger exiting vehicles.

The objection commented that the changes would also impact on road user safety and customer safety. The objection commented that the temporary acquisition would prevent access to a fire hydrant on the land.

The objection also states that the NTA has not considered any alternatives and therefore has not established that the CPO is necessary and alleges on that basis that the acquisition of these lands would be disproportionate.

iv) Impact to business- EIAR

Concerns were raised in the objection regarding the fact that the EIAR has not properly considered the impacts of the CPO on the respondent's business.

Response to Objections Raised

i) CPO Legislation – CPO Notice

The Notice was, as required by Article 4(b) of the Third Schedule to the 1966 Act, in the prescribed form being Form No. 8 as set out in the Schedule to the Housing Act 1966 (Acquisition of Land) Regulations 2000 (S.I. No. 454 of 2000).

Further, both (i) the public notice in relation to the CPO and (ii) the notice served on landowners sets out the purposes of the CPO being for "*the construction of the Swords to City Centre Core Bus Corridor Scheme together with all ancillary and consequential works associated therewith for the purposes of facilitating public transport*". The CPO Notice goes on to describe the scheme and also states that an "*Environmental Impact Assessment Report and a Natura Impact Statement have been prepared in respect of the development which it is proposed to carry out on the land*" and sets out where such documents were available for inspection.

In terms of service of the CPO Notice, the objector was served with the required statutory CPO notice and he took the opportunity to make an objection in relation to the CPO. The NTA fulfilled the requirement to serve him in accordance with section 3(1)(a) of the Housing Act 1966 (as amended) in that it was addressed to him by name and delivered to him.

ii) CPO Legislation – Notification Issue

For purposes of the CPO NTA established the ownership of the impacted lands including at the entrance to this property and they were included in the Schedules to the CPO and notified of the CPO. The existing entrance to the business park is approximately 19m wide with no pedestrian provision. The two entrance lanes are approximately 10m wide in total and the two exit lanes are approximately 9m wide. Left and right directional arrows are indicated on the exit lane, but no lane guidance markings are provided. The entrance and exit lanes are segregated with a temporary

barrier. The purpose for including the lands at the property entrance in the CPO was to upgrade the junction to improve safety for all users including in particular for pedestrians and cyclists. Given the proposed works at this location and the land acquisition required for same, there is no foreseeable impact to the occupants of the business park as a result of the CPO as access to the business park for such occupants will be maintained at all times, both during and post-construction.

iii) Criticisms of the EIAR

The Proposed Scheme has been designed to deliver upon the scheme objectives set out in Chapter 1 of the EIAR, which include enhancement of the potential for cycling by providing safe infrastructure for cycling. In some areas, land acquisition is required to deliver what has been determined to be the most appropriate design configuration that meets the scheme objectives. All areas included in the CPO have been carefully considered and only included where deemed absolutely necessary to meet the scheme objectives and to construct the scheme with permanent and temporary acquisitions respectively.

In response to the request from the landowner for consideration of a signalised junction at this location, the NTA are applying for approval of a minor modification to the Proposed Scheme in terms of a minor modification to the design of the junction at the entrance to the Collinstown Business Park to introduce a signalised junction which is discussed in more detail in section 2.7.2.4 of the report entitled *Observations on the Proposed Scheme Submissions for the Swords to City Centre Core Bus Corridor Scheme* submitted to the Board by the NTA. No additional lands are required to facilitate this proposed minor modification beyond those lands already included in the Swords to City Centre Core Bus Corridor Scheme Compulsory Purchase Order 2023 as submitted to the Board for confirmation.

With regard to the impact of temporary land acquisition on the business park, it is acknowledged by the NTA that 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. As described in Section 5.5.3.2 of Chapter 5 Construction of Volume 2 of the EIAR, '*details regarding temporary access provisions will be discussed with residents and business owners prior to construction starting in the area. The duration of the works will vary from property to property, but access and egress will be maintained at all times*', this includes access to the fire hydrant on the land.

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on each landowner whose land is being acquired. Following service of the Notice to Treat, each landowner will be required to submit a claim for compensation, which can include perceived loss in property value, and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage their own agent / valuer in preparing, negotiating, and advising on compensation.

In terms of alternative solutions, Chapter 3 of the EIAR sets out the reasonable alternatives studied and the main reasons for the selection of the Proposed Scheme taking into account the effects on the environment. Within this Chapter consideration is given to strategic alternatives including both light rail and metro. Section 3.2.5 of this chapter states that the appropriate type of public transport provision in any particular case is predominately determined by the likely quantum of passenger demand along the particular public transport route.

For urban transport systems, bus-based transport is the appropriate public transport mode for passenger demand levels of up to 4,000 passengers per hour per direction. (UITP 2009). Light rail provision would generally be appropriate to cater for passenger demand of between 3,500 and about 7,000 passengers per hour per direction. Passenger demand levels above 7,000 passengers per hour per direction would generally be catered for by heavy rail or metro modes, which would usually be expected to serve a number of major origins or destinations along a Particular corridor. In the case of both the bus and light rail modes, higher levels of passenger demand than the above stated figures can be accommodated under specific conditions.

The development of the prior GDA Transport Strategy considered the likely public transport passenger demand levels across the region using the NTA's transport model and took into account the other studies referenced above, in addition to studies that had been carried out to investigate a

potential light rail scheme within the area of this corridor. Likely passenger flows were identified to be within the capacity of bus transport, without reaching the quantum of passenger demand which would support the provision of a higher capacity rail solutions in addition to a Metrolink. Section 3.2.1 set out various studies undertaken for the prior GDA Transport Strategy. Arising from these studies and the specific assessment and transport modelling work undertaken for the prior Strategy, it was concluded that a bus-based transport system would be the proposed public transport solution in the corridor of the Proposed Scheme. The proposed transport solution would be supplemented by Metro, to provide more passenger capacity and enhanced interchange between the Luas Red and Green Line Services, proposed Metrolink Station at Fosterstown, Sligo/Maynooth Line Heavy Rail Services at Drumcondra Station and the Suburban Interchange between the Orbital and Radial Routes at Coolock Lane. It was considered that there would be insufficient demand to justify the provision of an additional light rail alternative beyond what is proposed above, particularly given the low to medium density nature of development in this corridor.

Similar to BRT, the light rail option would be worse for the environment in terms of construction impacts, including flora and fauna, heritage, air and noise, compared to the CBC proposal. Light rail requires continuous unbroken physical lane infrastructure to achieve high-priority. This would involve significantly more land take and potentially involve demolition of buildings at pinch-points. In the case of the CBC proposals, bus-priority can be achieved through short lengths at pinch-points by the use of signal controlled priority.

Given the consideration of light rail provision, and the level of likely public passenger use along this overall corridor assessed in the transport modelling work, the development of the prior GDA Transport Strategy identified that a Metro solution would be economically justified within the area covered by this corridor. Therefore, it is intended to develop the light rail Metro system along this corridor through the implementation of MetroLink.

Arising from the various studies and analysis that had been carried out, and the specific assessment and transport modelling work undertaken for the prior GDA Transport Strategy, 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. This is because 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.

With respect to congestion charging, Section 3.2.8 of the EIAR states that a key success factor of demand management is greater use of alternative travel modes, in particular public transport. In the case of Dublin, the existing public transport system does not currently have sufficient capacity to cater for larger volumes of additional users.

In advance of a significant uplift in overall public transport capacity in the Dublin metropolitan area, the implementation of major demand management measures across that area would be unsuccessful. Effectively constraining people from making journeys by car and requiring them to use other modes, without those modes having the necessary capacity to cater for such transfer, would not deliver an effective overall transport system. Instead, the capacity of the public transport system needs to be built up in advance of, or in conjunction with, the introduction of major demand management measures in the Dublin metropolitan area. This is especially true in the case of the bus system where a major increase in bus capacity through measures such as the Proposed Scheme would be required for the successful implementation of large scale demand management initiatives.

While the foregoing addresses the dependency of demand management measures on public transport capacity, it is equally correct that the provision of greatly enhanced cycling facilities will also be required to cater for the anticipated increase in cycling numbers, both in the absence of demand management measures and, even more so, with the implementation of such measures. Demand management initiatives by themselves will not deliver the level of segregated cycling infrastructure required to support the growth in that mode. Consequently, the progression of demand management proposals will not secure the enhanced safe cycling infrastructure envisaged under the Proposed Scheme.

Finally it is noted that park and ride and cashless fares both form part of the broader BusConnects programme and may be implemented to complement improvements to the overall bus system, including the Proposed Scheme infrastructure.

iv) Impact to business - EIAR

The Proposed Scheme has been designed to deliver upon the scheme objectives set out in Chapter 1 of the EIAR, which include enhancement of the potential for cycling by providing safe infrastructure for cycling. In some areas, land acquisition is required to deliver what has been determined to be the most appropriate design configuration that meets the scheme objectives. All areas included in the CPO have been carefully considered and only included where deemed absolutely necessary to meet the scheme objectives and to construct the scheme with permanent and temporary acquisitions respectively.

Chapter 10 (Population) in Volume 2 of the EIAR includes an assessment of the impact on commercial properties as a result of land take during both the Construction Phase (Section 10.4.3.2.2.1) and the Operational Phase (Section 10.4.4.2.2.1). The commercial properties which were assessed are listed in the Chapter's Appendix A10.1 (Schedule of Commercial Businesses) in Volume 4 Part 3 of the EIAR, of which the Collinstown Business Park is entry number 34. The property was not assessed as being significantly impacted by either the construction or operation of the Proposed Scheme as summarised in the aforementioned sections. The impact of land take on commercial receptors across the Larkhill – Whitehall – Santry community area as a whole is considered Negative, Slight and Temporary/Short-Term during the Construction Phase. While the impact during the Operation Phase is assessed as Negative, Slight to Moderate and Long-Term.

CPO-06 – Collinstown Caravans Limited

Summary of Objections Raised

The objection to the CPO raises two potential issues, and requests an oral hearing:

i) CPO Legislation – CPO Notice

NTA are considered to have failed to comply with the statutory requirements under Housing Act 1966 (as amended) to properly set out the effect of the CPO in the notice.

The objection considers that the Notice does not set out any information in relation to any works intended to be carried out on the lands. The objection also states a wish to reserve the right to make a more detailed submissions in relation to the impact of the proposed temporary acquisition on their home, properties and business at an Oral Hearing.

ii) Criticisms of the EIAR

Concerns were made considering that the EIAR has not properly considered the impacts of the CPO on the affected lands. The objection is concerned that implementation of the proposal shown on the NTA drawing would extinguish any access, vehicular or pedestrian to the company's dwelling house.

Response to Objections Raised

i) CPO Legislation – CPO Notice

The Notice was, as required by Article 4(b) of the Third Schedule to the 1966 Act, in the prescribed form being Form No. 8 as set out in the Schedule to the Housing Act 1966 (Acquisition of Land) Regulations 2000 (S.I. No. 454 of 2000).

Section 3(1) of the Housing Act 1966 (as amended) provides as follows:-

> "*3. (1) Where a notice, copy of an order, or demand is required or authorised by this Act or any order or regulation made thereunder to be served on, given to or made of a person, it shall be addressed to him and shall be served on, given to or made of him in some one of the following ways:*
>
> *(a) where it is addressed to him by name, by delivering it to him;*

(b) by leaving it at the address at which he ordinarily resides or, in a case in which an address for service has been furnished, at that address;

© by sending it by post in a prepaid registered letter addressed to him at the address at which he ordinarily resides or, in a case in which an address for service has been furnished, at that address or, where such registered letter is returned undelivered to the sender, by ordinary prepaid post;

(d) where the address at which he ordinarily resides cannot be ascertained by reasonable inquiry and the notice, copy or demand is so required or authorised to be served, given or made in respect of any land or premises or works thereon, by delivering it to some person over sixteen years of age resident or employed on such land or premises or by affixing it in a conspicuous position on or near such land or premises."

The objector was in fact served with the required statutory CPO notice and he took the opportunity to make an objection in relation to the CPO and so the NTA fulfilled the requirement to serve him in accordance with section 3(1)(a) of the Housing Act 1966 (as amended) in that it was addressed to him by name and delivered to him.

ii) Criticisms of the EIAR

The Proposed Scheme has been designed to deliver upon the scheme objectives set out in Chapter 1 of the EIAR, which include enhancement of the potential for cycling by providing safe infrastructure for cycling. In some areas, land acquisition is required to deliver what has been determined to be the most appropriate design configuration that meets the scheme objectives. All areas included in the CPO have been carefully considered and only included where deemed absolutely necessary to meet the scheme objectives and to construct the scheme with permanent and temporary acquisitions respectively.

When roads and streets are being upgraded, there will be some temporary disruption / alterations to on-street and off-street parking provision, and access to premises in certain locations along the Proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. As described in Section 5.5.3.2 of Chapter 5 Construction of Volume 2 of the EIAR, '*details regarding temporary access provisions will be discussed with residents and business owners prior to construction starting in the area. The duration of the works will vary from property to property, but access and egress will be maintained at all times*'.

Vehicular or pedestrian access to the property will not be blocked or restricted as a result of the construction of the Proposed Scheme. During the operational stage, there will be no restrictions to the access as indicated on General Arrangement Drawings in the EIAR, Volume 3, Figures, Chapter 4 Proposed Scheme Description, 03. General Arrangement is shown in Figure 2.22.

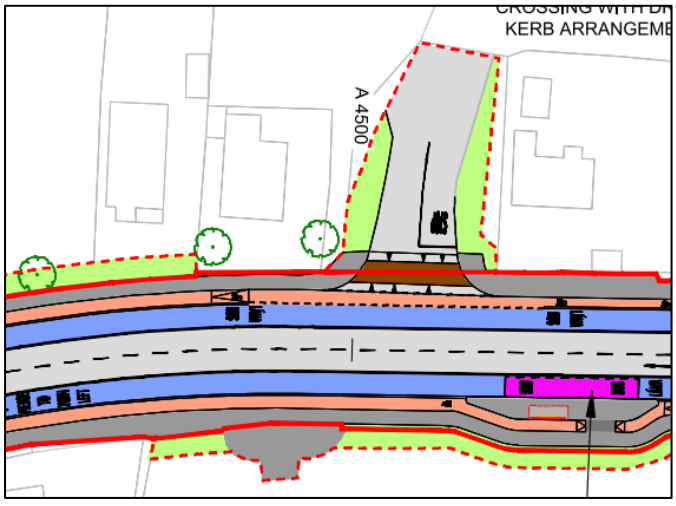

Figure 2.22 General Arrangement of Proposed Scheme at Plot 1090(2).2d and 1090(1).1d (Sheet 13)

As noted in Chapter 4 Proposed Scheme Description of the EIAR, reinstatement of property frontage including boundary walls, gates, railings driveway, footpath and landscaping will be on a like-for-like basis, and detailed accommodation works plans will be prepared in consultation with landowners in line with any formal agreements and in accordance with any embedded mitigations identified in the EIAR or conditions/modifications from An Bord Pleanála in relation to the Proposed Scheme application. The reinstatement of the boundary treatment will ensure a physical boundary is provided between the Proposed Scheme and the property, on a 'like for like' basis.

2.7 Collinstown Cross – CPO-13 and CPO-14

2.7.1 Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor, it is proposed to provide a footpath, cycle track, bus lane and general traffic lane in each direction.

The existing road cross section in this location provides a footpath on each side of the road with a general traffic lanes and a bus lane in each direction. There is an advisory cycle lane in the inbound direction only.

In order to achieve the required cross section of the Proposed Scheme land acquisition is necessary from private properties along this section of Swords Road.

The land take required is shown in the following:

- relevant extract of the EIAR Volume 3 Chapter 4 Proposed Scheme Description Figures, General Arrangement drawings in Figure 2.23.
- and the existing aerial view in Figure 2.24.

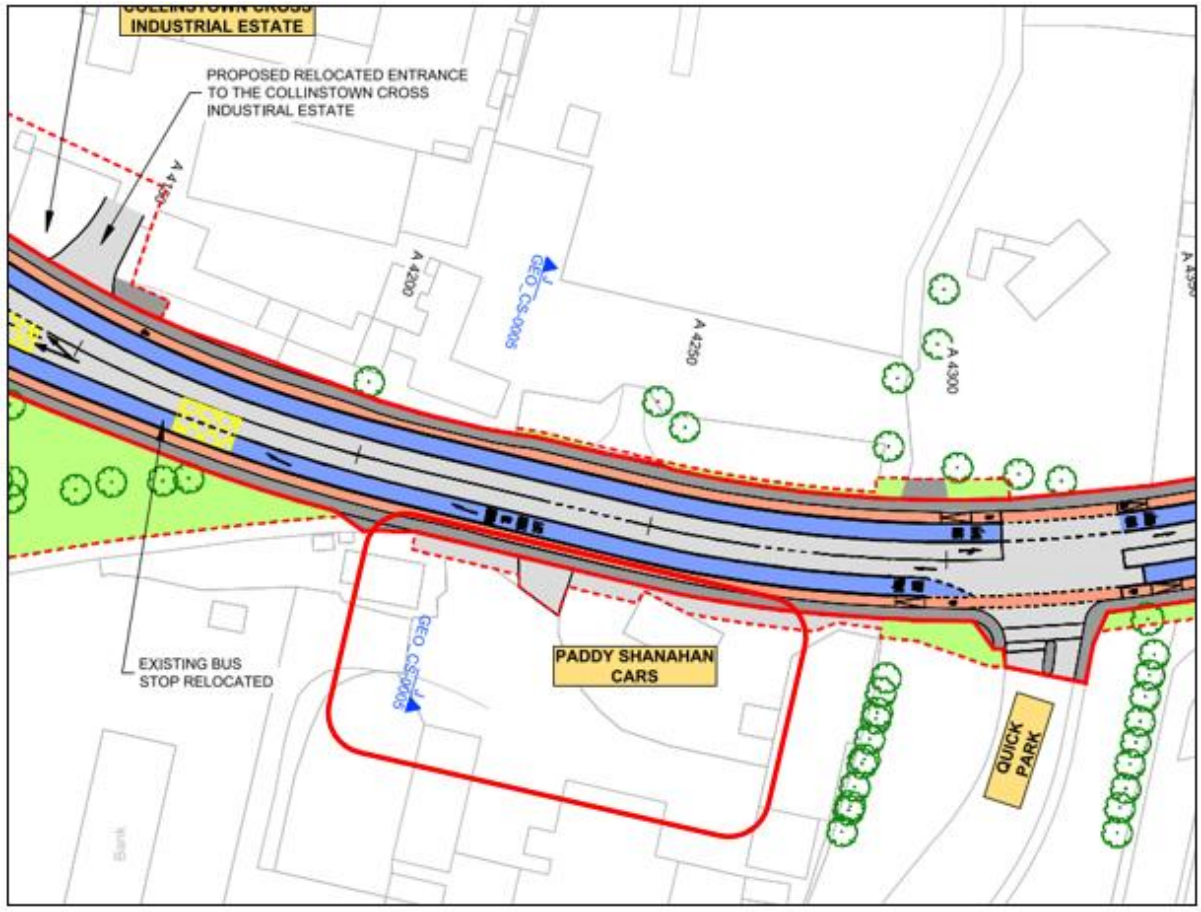

Figure 2.23 Proposed New Layout at Collinstown Cross

Figure 2.24 Existing Aerial View at Collinstown Cross

Objections CPO-13 and CPO-14, which relate to two separate CPO plots that are adjacent to each other, are responded to individually below.

CPO-13 – JJ Gillian and Co Ltd

Summary of Objections Raised

The objection to the CPO raises two potential issues:

i) Access to business

Access is considered vital to the ability to continue to trade. Continued 24-hour access is required for customers, delivery trucks and vans etc. It is considered that temporary or permanent blocking of the entrance would adversely affect the business as well as that of any tenants.

ii) Construction Impacts

CPO for plot 1047 would mean the removal of a JC Decaux Ireland Ltd billboard.

Plot 1047(2).2c areas are used daily by the tenant and would impact directly on the business, it is also the site of the business signage which is considered vital to the business.

Response to Objections Raised

i) Access to business

When roads and streets are being upgraded, there will be some temporary disruption / alterations to on-street and off-street parking provision, and access to premises in certain locations along the Proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. As described in Section 5.5.3.2 of Chapter 5 Construction of Volume 2 of the EIAR, '*details regarding temporary access provisions will be discussed with residents and business owners prior to construction starting in the area. The duration of the works will vary from property to property, but access and egress will be maintained at all times*'.

ii) Construction Impacts

The NTA acknowledges the impact on a JC Decaux Ireland Ltd billboard. The impact of the loss of this billboard will be reviewed as part of the landowners claim for compensation.

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation, which can include perceived loss in property value, and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage its agent / valuer in preparing, negotiating and advising on compensation.

The Proposed Scheme has been designed to deliver upon the scheme objectives set out in Chapter 1 of the EIAR, which include enhancement of the potential for cycling by providing safe infrastructure for cycling. In some areas, land acquisition is required to deliver what has been determined to be the most appropriate design configuration that meets the scheme objectives. All areas included in the CPO have been carefully considered and only included where deemed absolutely necessary to meet the scheme objectives and to construct the scheme with permanent and temporary acquisitions respectively.

When roads and streets are being upgraded, there will be some temporary disruption / alterations to on-street and off-street parking provision, and access to premises in certain locations along the Proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. As described in Section 5.5.3.2 of Chapter 5 Construction of Volume 2 of the EIAR, '*details regarding temporary access provisions will be discussed with residents and business owners prior to construction starting in the area. The duration of the works will vary from property to property, but access and egress will be maintained at all time*s'.

CPO-14 – JJ Gillian and Co Ltd

Summary of Objections Raised

The objection to the CPO raises two potential issues:

i) Impact to business (operation)

The objection listed concerns that the acquirement of these lands would mean that continued operating from this land under its current use would be impossible; it is currently a car dealership/mechanic's workshop.

ii) Access to business

The objection raised concerns that the scheme would temporarily or permanently block the entrance to the business at this site, and this would adversely affect it.

Response to Objections Raised

i) Impact to business (operation)

The Proposed Scheme has been designed to deliver upon the scheme objectives set out in Chapter 1 of the EIAR, which include enhancement of the potential for cycling by providing safe infrastructure for cycling. In some areas, land acquisition is required to deliver what has been determined to be the most appropriate design configuration that meets the scheme objectives. All areas included in the CPO have been carefully considered and only included where deemed absolutely necessary to meet the scheme objectives and to construct the scheme with permanent and temporary acquisitions respectively.

In this specific area, the proposed cross-section and subsequent land acquisition have been considered and deemed necessary to facilitate the optimum scheme as presented in EIAR Volume 3 Chapter 4 Proposed Scheme Description Figures, General Arrangement drawings.

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on each landowner whose land is being acquired. Following service of the Notice to Treat, each landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage their own agent / valuer in preparing, negotiating, and advising on compensation.

ii) Access to business

When roads and streets are being upgraded, there will be some temporary disruption / alterations to on-street and off-street parking provision, and access to premises in certain locations along the Proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. As described in Section 5.5.3.2 of Chapter 5 Construction of Volume 2 of the EIAR, '*details*

regarding temporary access provisions will be discussed with residents and business owners prior to construction starting in the area. The duration of the works will vary from property to property, but access and egress will be maintained at all times'.

2.8 Cloghran - CPO-24 and CPO-28

2.8.1 Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor, it is proposed to provide a 2m wide footpath, 2m wide cycle track, bus lane and two general traffic lanes in each direction.

The existing road cross section in this location provides a footpath inbound, a shared pedestrian and cycle path outbound, an advisory cycle lane inbound, a bus lane outbound and two general traffic lanes in each direction.

In order to achieve the required cross section of the Proposed Scheme land acquisition is necessary from private properties along this section of Swords Road.

The land take required is shown in the following:

- relevant extract of the EIAR Volume 3 Chapter 4 Proposed Scheme Description Figures, General Arrangement drawings in Figure 2.25.
- and the existing aerial view in Figure 2.26.

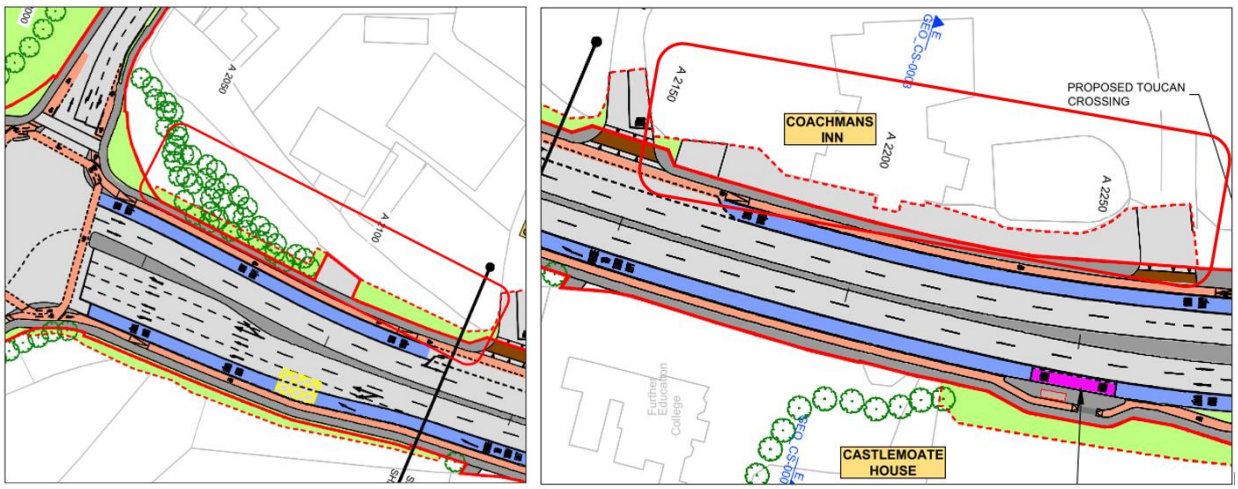

Figure 2.25 Proposed New Layout

Figure 2.26 Existing Aerial View

Objections CPO-24 and CPO-28, which relate to two separate CPO plots that are adjacent to each other, are responded to individually below.

CPO-24 – Patrick Fitzsimons and Parfit

Summary of Objections Raised

The objection to the CPO raises nine potential issues, and requests an oral hearing:

i) Surplus Land Acquisition

The property owner objects to the acquisition of lands which appear to be surplus for the scheme requirements. The objection considers that the acquisition of the areas in the CPO is excessive and appears unnecessary.

ii) Drainage

The property owner is concerned in relation to drainage implications associated with the works on the public road, particularly that they may negatively impact their retained property and parking areas.

iii) Noise

The objection alleges that inadequate information has been provided regarding the mitigation measures that are being proposed to control increased noise pollution from the intensive bus corridor.

iv) Access

The property owner has serious concerns in relation to the access to the retained property during and post construction. Insufficient detail is considered to have been provided in this regard. The objection considers that there would be a significant negative consequence if there is any negative impact on access arrangements during and post construction.

v) Traffic Management

The objection alleges that there is a lack of detail in relation to how traffic will be managed during the construction phase.

vi) Boundary Treatment

The objection considers that there is a lack of clarity in relation to the new boundary along the permanent acquisition area, and that there is a lack of clarity with regard to hoarding or proper temporary boundary treatments which will be essential in relation to health and safety.

vii) Environmental Impacts

There is concern within the objection that there is a lack of clarity around what the total environmental impact will be of the BusConnects scheme including the environmental impact and upfront carbon footprint for the construction phase. The owners have a concern in relation to the design of the scheme and the route that has been chosen.

viii) Footpaths/Cycle Paths

Concern there is a lack of clarity in relation to the impact of the scheme on footpaths and cycle paths.

ix) Other matters and proper planning and sustainable development

The objection considers that other relevant matters may arise when more detailed design information is made available, and the owner reserves the right to raise and deal with these matters at an Oral Hearing. In particular the objection considers that there are significant issues and concerns around proper planning and sustainable development of the area arising from the Proposed Scheme.

Response to Objections Raised

i) Surplus Land Acquisition

The Proposed Scheme has been designed to deliver upon the scheme objectives set out in Chapter 1 of the EIAR, which include enhancement of the potential for cycling by providing safe infrastructure for cycling. In some areas, land acquisition is required to deliver what has been determined to be the most appropriate design configuration that meets the scheme objectives. All areas included in the CPO have been carefully considered and only included where deemed absolutely necessary to meet the scheme objectives and to construct the scheme with permanent and temporary acquisitions respectively.

In this specific area, the proposed cross-section and subsequent land acquisition have been considered and deemed necessary to facilitate the optimum scheme as presented in EIAR Volume 3 Chapter 4 Proposed Scheme Description Figures, General Arrangement drawings.

Typically along the Proposed Scheme a 2.0-3.0m working room offset for temporary land take is required to ensure there is sufficient space available to construct the Proposed Scheme and boundary treatments. Any land that is temporarily acquired will be returned to the owner. It is intended that boundaries and accesses will be replaced on a like for like basis.

ii) Drainage

A Flood Risk Assessment was undertaken for the Proposed Scheme and is included as Appendix A13.2 (Flood Risk Assessment) in Volume 4 Part 3 in the EIAR. The Proposed Surface Water Drainage Works drawing series in Volume 3 (Figures) of the EIAR provides information in relation to drainage and the proposed drainage design.

Section 4.6.15 of Chapter 4 (Proposed Scheme Description) in Volume 2 of the EIAR describes the approach taken to drainage design for newly paved areas. In particular, the principal objectives of the drainage design are described in Section 4.6.15.5 as follows:

- '*All drainage structures for newly paved areas are designed with a minimum return period of no flooding in 1:30 years with a 20% climate change allowance;*
- *A SuDS drainage strategy has been developed for all newly paved areas in accordance with the SuDS hierarchy. SuDS are provided to ensure no increase on existing runoff rates from new paved areas will also provide a level of treatment before discharging into the existing network system; and*
- *Infiltration rates were assumed to be zero for calculating the required attenuation volumes for SuDS measures. This is a conservative approach and ensures SuDS measures are not knowingly undersized at this stage of the design. Where necessary, permeability tests will be completed so that infiltration rates can be considered in further design*.'

Supplementary information is also provided in Appendix K Drainage Design Basis Document of the Preliminary Design Report.

At the location of Parfit, road widening as part of the Proposed Scheme will result in slight additional catchment area on the inbound carriageway. Oversized pipes and storm water pipes are proposed as part of the surface water drainage works to drain any additional surface water from the newly paved areas. The details of the proposed drainage are indicated on the Surface Water Drainage Works drawings in the EIAR, Volume 3, Figures, Chapter 4 Proposed Scheme Description, 11. Proposed Surface Water Drainage Works, shown in Figure 2.27.

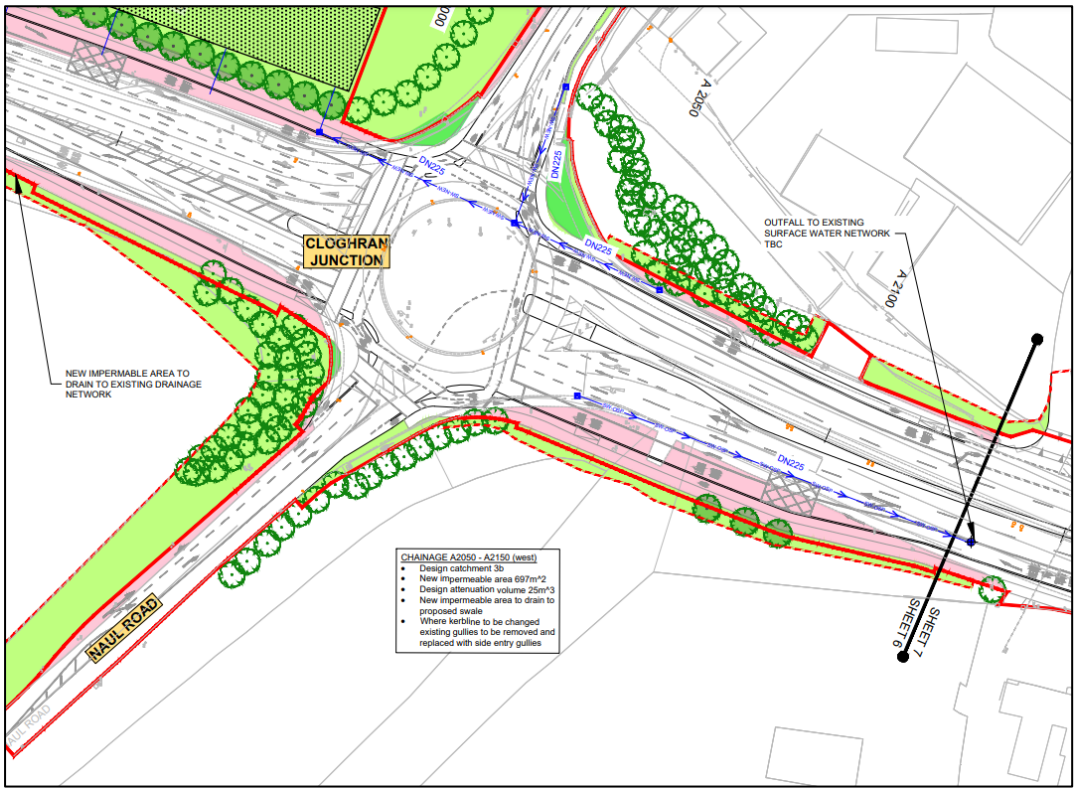

Figure 2.27 Proposed Surface Water Drainage Works at Parfit (Sheet 06)

iii) Noise

Regarding the noise impact of the Proposed Scheme, Section 9.4.4.1 of EIAR Volume 2 Chapter 9 Noise and Vibration provides details of the assessment undertaken for the Operational Phase of the Proposed Scheme in respect of the potential noise and vibration impacts associated with altered traffic flows, realigned traffic lanes and displaced traffic flows.

Section 9.4.4.1.1.5 states that '*Along the majority of roads of the Proposed Scheme within the 1km study area, impacts as a result of traffic redistribution are determined to be Indirect, Positive, Imperceptible to Slight to Moderate, and Short to Medium Term to Negative, Moderate, and Short to Medium term once the Proposed Scheme becomes operational*.' It goes on to state that '*There are a small number of roads in the overall study area where there are potential initial significant impacts. These are defined as roads with a traffic noise level above a daytime noise level of 55 dB LAeq,16hr an increase in noise level greater than 3 dB*.' Table 9.45 lists these roads and the section of Swords Road at the location of Parfit is not included in Table 9.45.

Section 9.5.2.1 summarises the change in road traffic noise in the operation phase as follows: *'The impact assessment has determined that there are no calculated significant direct or indirect traffic noise impacts across the study area for the Proposed Scheme. The range of noise level changes and overall noise levels calculated do not require any specific noise mitigation measures to be incorporated into the Proposed Scheme.'*

In respect of electric buses, as discussed in Section 9.4.4.1.1.4 of Chapter 9, during the proposed Opening Year (2028), the NTA forecast is for 94% of the city bus fleet to be EVs or HEVs. For the Design Year (2043), the city bus fleet is forecast to be 100% electric. The operation of electric and hybrid buses will eliminate ICE noise from buses accelerating, decelerating and idling at bus stops which is the dominant noise source.

In addition, the characteristic of noise from EVs is subjectively less intrusive compared to those with ICE's and is masked to a much greater extent by surrounding road traffic. It is noted the bus stops along the Proposed Scheme will be used by other bus operators which may not transition to EV and HEVs over the same period as the city bus fleet. The volume of these buses along the Proposed Scheme will, however, be significantly less than the city bus fleet and hence, noise levels associated with these areas will not generate significant noise levels over the prevailing noise environment.

With respect to construction noise impacts, as noted in Figure 9.3 in Volume 3 of the EIAR, a noise impact of Imperceptible/Positive is forecast along Swords Road in the vicinity of Parfit.

The EIAR contains a comprehensive set of mitigation measures to minimise construction phase impacts, including noise impacts. Construction noise mitigation measures are set out in Chapter 9 in Volume 2 of the EIAR (and are also summarised in Appendix 5.1 (Construction Environmental Management Plan) in Volume 4 of the EIAR).

Section 9.5.1.1 of EIAR Volume 2 Chapter 9 states that: *'The appointed contractor will be required to take specific noise abatement measures to the extent required and comply with the recommendations of BS 5228–1 (BSI 2014a) and S.I. No. 241/2006 - European Communities (Noise Emissions by Equipment for Use Outdoors) (Amendment) Regulations 2006.'* It also states that '*During the Construction Phase, the appointed contractor will be required to manage the works to comply with the limits detailed in Section 9.2.4.1 using methods outlined in BS 5228–1 (BSI 2014a)*'

Section 9.5.1.1 also states that *'BS 5228–1 includes guidance on several aspects of construction site practices, which include, but are not limited to:*

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

Specifically, Section 9.5.1.1. states that *'The appointed contractor will put in place the most appropriate noise control measures depending on the level of noise reduction required at individual working areas (i.e. based on the construction threshold values for noise and vibration set out in Table 9.8: and Table 9.11).'* [Note - Table 9.8 of Section 9.2.4.1 of EIAR Chapter 9 sets out the Construction Noise Threshold (CNT) Levels for the Proposed Scheme].

Section 9.5.1.1.4 of Chapter 9 sets out the proposed working hours and states: *'It is envisaged that generally construction working hours will be between 07:00hrs and 23:00hrs on weekdays, and between 08:00hrs and 16.30hrs on Saturdays. Night-time and Sunday working will be required during certain periods to facilitate street works that cannot be undertaken under daytime / evening time conditions.'*

However, the contractor will also have to take account of sensitive receptors (in particular any nearby residential areas). Section 9.5.1.1.4 goes on to state: '*The planning of such works will take consideration of sensitive receptors, in particular any nearby residential areas. Construction activities will be scheduled in a manner that reflects the location of the site and the nature of neighbouring properties. Construction activities / plant items will be considered with respect to their potential to exceed construction noise thresholds at NSLs and will be scheduled according to their noise level, proximity to sensitive locations and possible options for noise control. In situations where an activity with potential for exceedance of construction noise thresholds is scheduled (e.g. road widening and utility diversions or activities with similar noise levels identified in Table 9.42), other construction activities will be scheduled to not result in significant cumulative noise levels'.*

In summary the noise abatement measures set out in the EIAR that the appointed contractor will be required to put in place to comply with the limits detailed in Section 9.2.4.1 using methods outlined in BS 5228–1 will result in appropriate and adequate mitigation measures in respect of construction noise impact at this location during construction.

iv) Access

When roads and streets are being upgraded, there will be some temporary disruption / alterations to on-street and off-street parking provision, and access to premises in certain locations along the Proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. As described in Section 5.5.3.2 of Chapter 5 Construction of Volume 2 of the EIAR, '*details regarding temporary access provisions will be discussed with residents and business owners prior*

to construction starting in the area. The duration of the works will vary from property to property, but access and egress will be maintained at all times'.

Additionally EIAR Appendix A5.1 Section 5.2.1.2 states that an objective of the Construction Traffic Management Plan is to ensure disruption is minimised, with access to houses and businesses maintained, as is reasonably practicable in delivering the Proposed Scheme.

During the operational stage, there will be no restrictions to the access as indicated on General Arrangement Drawings in the EIAR, Volume 3, Figures, Chapter 4 Proposed Scheme Description, 03. General Arrangement is shown in Figure 2.28.

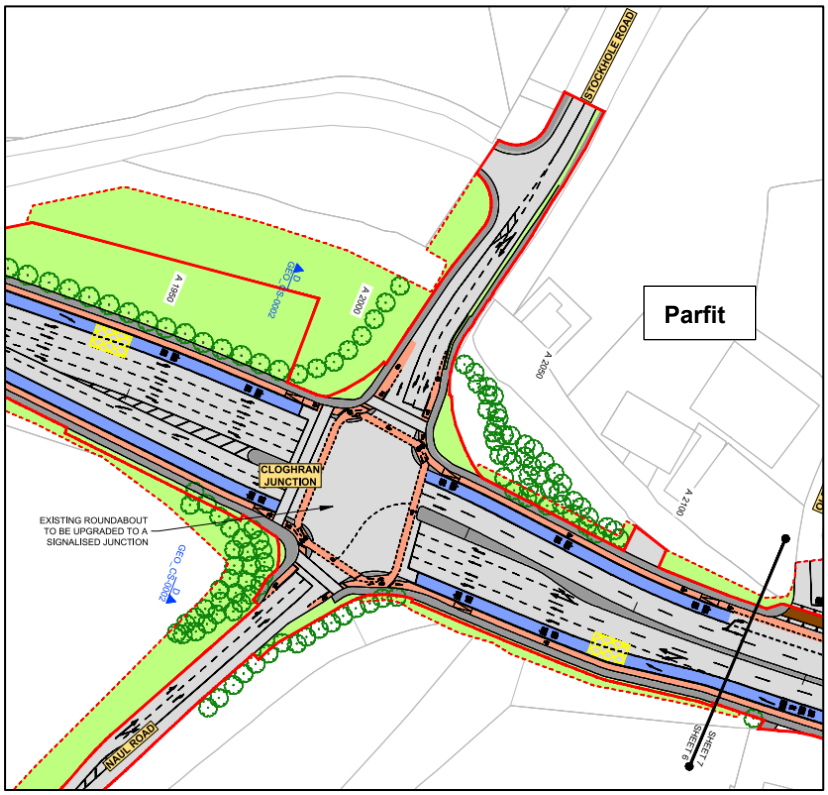

Figure 2.28 General Arrangement of Proposed Scheme at Parfit (Sheet 06)

v) Traffic Management

The Parfit business is located within Section 2a of the Proposed Scheme, as described in Section 5.3.2.1 of Chapter 5 Construction of Volume 2 of the EIAR, '*Section 2a encompasses a length of approximately 1,920m along Swords Road, between Airside Junction and (Dublin) Airport Roundabout. The construction activities at Section 2a will comprise conversion of the Cloghran roundabout to a signalised junction, pavement reconstruction and resurfacing of the roads, footpaths, and cycle tracks, and new kerbs. Construction activities will also consist of additional signage, new road markings, new and amended traffic signal infrastructure, new street furniture and landscaping works. A principal retaining wall (RW022) will be constructed north of the Cloghran Junction, approximately 50m in length and maximum 2m in retained height. A minor retaining wall (RW026) will be constructed opposite Metro Point Business Park, approximately 30m in length. A minor retaining wall (RW027) will be constructed along Swords Road, south of Cloghran Junction, approximately 85m in length. Boundary walls will be constructed, and gates will be relocated along Swords Road, north and south of the Airside Junction. Fencing will also be constructed along Swords Road, between Kettles Lane and Stockhole Road, south of Cloghran Junction, and along Castlemoate House. The Construction Compound (SW1) will be located at the Cloghran Junction. Utility (telecommunications infrastructure) diversions and/or protections will be required. The expected construction duration will be approximately 18 months.'* It should be noted however, that construction activities at individual plots will have shorter durations than outlined in overview of construction works presented Section 5.3.

Section 5.5.2.3 of Chapter 5 Construction notes that prior to commencing the construction works described above within a sub-section of the Proposed Scheme, temporary traffic management measures will be installed. '*The temporary traffic management measures, including measures for*

pedestrians, cyclists, public transport users, general traffic, proposed lane closures, road closures and diversions are discussed in detail in Section 5.8. Temporary traffic management signage will be put in place in accordance with the requirements of the Department of Transport's Traffic Signs Manual, Chapter 8, Temporary Traffic Measures and Signs for Roadworks (hereafter referred to as the Traffic Signs Manual) (Department of Transport, Tourism and Sport 2019). Further information is also provided in the Construction Traffic Management Plan (CTMP) in Appendix A5.1 CEMP in Volume 4 of this EIAR.'

As set out in Section 5.8.3 of Chapter 5 Construction, road closures and diversions will need to be carried out during the Construction Phase of the Proposed Scheme, however these measures will be minimised wherever possible. As set out in Section 8 of Appendix A6.1 Traffic Impact Assessment, general traffic redistribution is not anticipated to be a significant issue during the construction phase, however there will be a requirement for some localised temporary road closures for short durations of the daytime and / or night-time. Therefore, the impact on general traffic redistribution is anticipated to be a Medium Negative impact.

vi) Boundary Treatment

The NTA notes the comment raised in relation to Boundary Treatment. Additional information has been provided below.

In regard to Boundary Treatments the NTA recognises the importance of maintaining the character of the streetscape where boundary adjustments are required. In the Supplementary Information section of the planning application documentation, Section 13.5 of the Preliminary Design Report outlines the approach to maintaining boundary treatment character. This is also reflected in Chapter 5 (Construction) in Volume 2 of the EIAR, where Section 5.5.2.1 states:

'*Boundary works will be commenced where both permanent and temporary land acquisition is required to ensure that sufficient space is available to construct the Proposed Scheme. Boundary treatments will be carried out on a section-by-section basis (with sections/sub-sections defined in Section 5.2, and in line with the traffic management stages set out in Section 5.8.3.*

This will be a mixture of boundary walls/fencing along industrial/commercial land, railings along parks and temporary boundaries, as required. Any land temporarily acquired from a landowner will only be utilised for the purposes of undertaking boundary works or accommodation works related to the land in question.

Any lands acquired temporarily to facilitate construction work will be returned to landowners on completion of the works. Existing boundary walls or fencing being relocated will be constructed to match the existing conditions, unless otherwise agreed. The removal of trees, vegetation, lawns, paving etc. will be minimised in so far as practicable.'

Chapter 17 (Landscape (Townscape) & Visual) in Volume 4 of the EIAR also addresses boundary treatments, stating in Section 17.4.1 that:

'*New boundaries will be established on the setback line to match the existing boundary. The construction and provision of the new boundaries will take account of the location of existing trees, other plantings, gradients, drainage, property features and access arrangements so as to minimise additional indirect effects. Where practicable, existing railings, gates, cut stone walls and/or piers (or where appropriate, elements of same) to be removed will be reinstated on the new setback boundary line subject to discussion between the landowner and the NTA*'.

The NTA will prepare detailed accommodation works plans in consultation with impacted landowners upon confirmation of the CPO by An Bord Pleanála. Section 4.6.18.1 of Chapter 4 (Proposed Scheme Description) in Volume 2 of the EIAR describes the approach for boundary treatment:

'*To maintain the character and setting of the Proposed Scheme, the approach to undertaking the new boundary treatment works along the corridor is replacement on a 'like for like' basis in terms of material selection and general aesthetics, unless a section of street can benefit from urban improvement appropriate to the area*'.

vii) Environmental Impacts

With regard to environmental impacts for the Proposed Scheme, the Environmental Impact Assessment Report (EIAR) has assessed these impacts in each of the assessment chapters and summarised in Table 23.1: Summary of Significant Residual Impacts from the Construction and Operational Phases of the Proposed Scheme of the EIAR Volume 2 of 4 Main Report for the operational phase. It is noted that for;

- **Fauna and Flora** – this is assessed in Chapter 12 Biodiversity of the EIAR. As stated in Section 12.6.2 following the implementation of the mitigation measures the Proposed Scheme will not result in any significant residual effects during the Operational Phase.
- **Soil** – this is assessed in Chapter 14 Land Soils Geology & Hydrogeology of the EIAR. As stated in Section 14.6.2 no significant residual impacts on land, soils, geology and hydrogeology as a result of the operation of the Proposed Scheme
- **Water** – this is assessed in Chapter 13 Water of the EIAR. As stated in Section 13.6.2 no significant residual impacts have been identified in the Operational Phase of the Proposed Scheme.
- **Air** – this is assessed in Chapter 7 Air Quality of the EIAR. As stated in Section 7.6.2 overall it is considered that the residual impacts of the Proposed Scheme's Operational Phase will be Neutral and Long-Term.
- **Climate** – this is assessed in Chapter 8 Climate of the EIAR. As stated in Section 8.8.2 the Proposed Scheme will make a significant contribution to reduction in carbon emissions.
- **Landscape** – this is assessed in Chapter 17 Landscape (Townscape) & Visual of the EIAR. As noted in Section 17.6.2 the impact on non-residential properties included in permanent acquisition (e.g. business, commercial, hotel etc.) is deemed to be negative moderate/significant and short-term.
- **Population** – this is assessed in Chapter 10 Population and in Appendix A10.2 of the EIAR. As noted in Section 10.6.2 the Proposed Scheme will deliver positive impacts in terms of accessibility to commercial businesses for pedestrians, cyclists and bus users during the operational phase.

Specifically in relation to the carbon footprint of the construction phase, Section 8.8.2 of Chapter 8 Climate of volume 2 of the EIAR states:

'The Proposed Scheme is estimated to result in total Construction Phase CO2e emissions of 8,396 tonnes embodied CO2eq for materials over a 36-month period. The IEMA Guidance (IEMA 2022) states that 'Carbon budgets allow for continuing economic activity, including projects in the built environment, in a controlled manner'. Thus, projects which have a carbon footprint are not necessarily significant provided that the projects are compatible with net zero by 2050, and the full range of mitigation measures are employed to minimise the carbon footprint. Given that the construction of the Proposed Scheme itself will lead to operational GHG emission reductions overall, then the Construction Phase should be viewed as compatible with net zero emission targets. Thus, the assessment of significance for the Construction Phase of the Proposed Scheme is deemed to have a minor adverse impact, given that the Construction Phase emissions are equivalent to an annualised total of 0.007% of Ireland's non-ETS 2020 target and 0.047% of the 2030 Transport Emission Ceiling. The potential impact to climate due to embodied carbon emissions during the Construction Phase, prior to mitigation, will be Negative, Minor and Short-Term.'

viii) Footpaths/Cycle Paths

As referenced in the EIAR Section 3.2.3 of the Traffic Impact Assessment Report (Volume 4 Appendices Part 1 of 2, A6.1 Transport Impact Assessment Report), the recently published National Investment Framework for Transport in Ireland (NIFTI) sets out a hierarchy of travel modes to be accommodated and encouraged when investments and other interventions are made. Sustainable modes, starting with active travel (walking, wheeling and cycling) and then public transport, will be encouraged over less sustainable modes such as the private car. This aligns with the core objectives of the Proposed Scheme.

Chapter 4 Proposed Scheme Description of the EIAR outlines the design principles associated with the Core Bus Corridor. It has been designed following guidance relating to the design principles for urban streets, bus facilities, cycle facilities and public realm. Figure 2.29 shows the typical road layout proposed for the Core Bus Corridor.

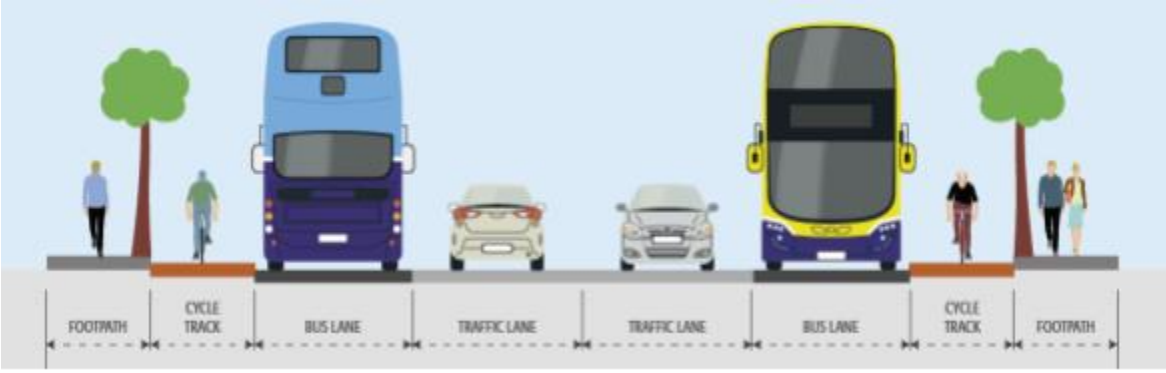

Figure 2.29 Typical Road Layout

Cycling Provision

Section 5.3.3.2 of the Traffic Impact Assessment describes the cycling infrastructure proposals between Airside Junction and Northwood Avenue.

Section 4.6.3 of Chapter 4 of Volume 2 of the EIAR describes the preferred provision of dedicated cycle facilities along the route:

'The 'preferred cross-section template' developed for the Proposed Scheme includes protected cycle tracks, providing vertical segregation from the carriageway to the cycle track and vertical segregation from the cycle track to the footpath.'

The desirable minimum width for a single-direction cycle track is two metres. Figure 2.30 shows the typical arrangements of a fully segregated cycle track provided alongside the adjacent bus lane and footpath.

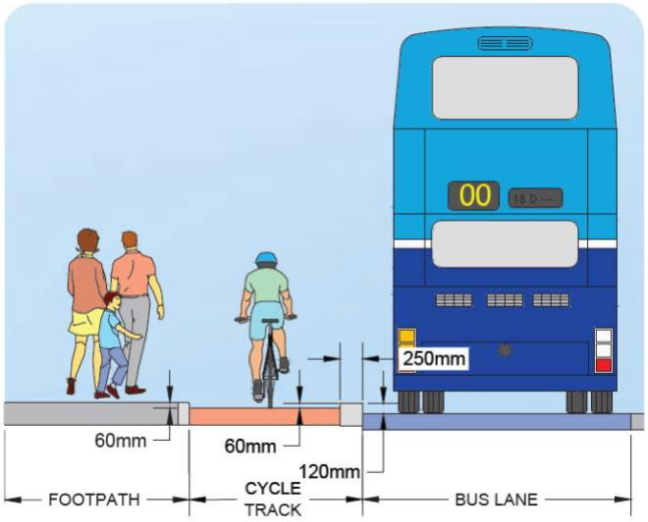

Figure 2.30 Typical arrangements of fully segregated cycle track

Pedestrian provision

Section 5.3.3.1 of the Traffic Impact Assessment describes the pedestrian infrastructure proposals between Airside Junction and Northwood Avenue.

Enhancements for pedestrians are made through the provision of upgraded footpath facilities located adjacent to fully segregated cycle track. The footpath is vertically segregated from the cycle track by a kerb with an upstand height of 60mm. As stated in Section 4.6.2 of the EIAR:

'The desirable minimum width for a footpath is 2.0m. This width should be increased in areas catering for significant pedestrian volumes where space permits. DMURS defines the absolute minimum footpath width for road sections as 1.8m based on the width required for two wheelchairs to pass each other. Building for Everyone: A Universal Design Approach (NDA 2020), defines acceptable minimum footpath widths at specific pinch points as being 1.2m wide over a two-metre length of path.'

Junctions have been designed to facilitate a high level of safety, comfort, and priority for sustainable modes of travel (i.e. walking and cycling) and for public transport by prioritising the space and time allocated to these modes within the operation of a junction.

ix) Other matters and proper planning and sustainable development

Regarding the objectors concerns around proper planning and sustainable development of the Proposed Scheme, the Transport Strategy for the Greater Dublin Area 2022-2042 (hereafter described as the GDATS) was published for consultation on the 9 November 2021 and has been prepared in accordance with Section 12 of the Dublin Transport Authority Act 2008 (as amended). It was adopted in January 2023 and replaces the previous Transport Strategy for the Greater Dublin Area 2016 – 2035. Under the Dublin Transport Authority Act 2008, the NTA must review its Transport Strategy every six years. The GDATS is considered to be an essential component for the orderly development of the GDA for the next 20 years. The overall aim of the strategy is *'To provide a sustainable, accessible and effective transport system for the Greater Dublin Area which meets the region's climate change requirements, serves the needs of urban and rural communities, and supports the regional economy'*. A key focus of the strategy is to enable increased use of other transport modes to meet environmental, economic and social objectives related to emissions, congestion and car dependency. It sets a clear direction towards a 50% reduction in CO2 emissions within the GDA area by 2030. The Transport Strategy report and background documents can be downloaded from the following website:

https://www.nationaltransport.ie/planning-and-investment/strategic-planning/greater-dublin-area-transport-strategy/ .

The GDATS sets out a range of measures and those of relevance to the Proposed Scheme are outlined in Table 2.6. The GDA Transport Strategy 2022 - 2042 (NTA 2022) puts the delivery of Dublin BusConnects, of which the Proposed Scheme is part, at the heart of its objectives. There is added emphasis on the delivery of public transport, active travel and enhanced accessibility to sustainable modes of transport, all of which the Proposed Scheme will help to deliver.

Table 2.6 GDA Transport Strategy 2022 – 2042 Measures

Measure Number	Measure	How the Proposed Scheme meets the Measure
PLAN2 – The Road User Hierarchy	*The NTA, in the decision-making process around the design, planning and funding of transport schemes in the GDA, will be guided by the priority afforded to each mode in the Road User Hierarchy as set out in the Transport Strategy.'*	The Proposed Scheme aligns with the measure as it will promote modal shift from private car to a more sustainable forms of transport. It enhances active travel networks and thus encourages the use of these modes reducing reliance on the private car.
PLAN14 - Urban Design in Major Infrastructure Projects	*'The NTA will incorporate a high standard of urban design and placemaking, taking into account architectural heritage, into the planning and design of all major public transport infrastructure schemes and will consider how greater biodiversity can be fostered.'*	The overall landscape and public realm design strategy for the Proposed Scheme aims to create attractive, consistent, functional and accessible places for people alongside the core bus and cycle facilities. In addition, opportunities have been sought to enhance the public realm and landscape. As part of the Proposed Scheme public realm improvements are proposed at several locations. For example, the Drumcondra Road Upper shopping parade is identified as a local enhancement opportunity to improve the image of the public realm, this includes footway enhancements and upgrades to the parking bays. Similarly, the area in front of The Comet in Santry is proposed to have surface treatment enhancements and de-cluttering and reorganising of the street furniture. All the plants and trees selected will be native species, appropriate to the location. The enhancement opportunities include key nodal locations which focus on locally upgrading the quality of the paving materials, extending planting,

Measure Number	Measure	How the Proposed Scheme meets the Measure
		decluttering of streetscape and general placemaking along the route.
Measure PLAN15 – Urban Design in Walking and Cycling Projects	*'In the design, planning and prioritisation of walking and cycling schemes, the NTA and the local authorities will ensure the incorporation of urban design and placemaking considerations, taking into account architectural heritage, and will consider how greater biodiversity could be fostered.'*	The overall landscape and public realm design strategy for the Proposed Scheme aims to create attractive, consistent, functional, and accessible places for people alongside the core bus and cycle facilities. Along the route of the Proposed Scheme, improvements and enhancements will be made to footpaths, walkways, and pedestrian crossings. Additional landscaping and outdoor amenities will be provided to improve the local urban realm.
Measure PLAN16 – Reallocation of Road Space	*'The NTA, in conjunction with the local authorities, will seek the reallocation of road space in appropriate locations in Dublin City Centre, Metropolitan towns and villages, and towns and villages across the GDA in accordance with the road user hierarchy, in order to prioritise walking, cycling and public transport use and prioritise the placemaking functions of the urban street network.'*	The Proposed Scheme will support integrated sustainable transport usage through road space reallocation in support of infrastructure improvements for active travel (both walking and cycling), and the provision of enhanced bus priority measures for existing (both public and private) and all future services who will use the corridor. The Proposed Scheme reallocates road space along the route to facilitate full and continuous bus lanes along the north and south quays.
Measure INT3 – Integration of all Modes in Transport Schemes	*'It is the intention of the NTA, in the design and planning of transport schemes, to ensure that the needs of all transport modes are considered, as appropriate, based on the objectives of the scheme and on the road user hierarchy.'*	The Proposed Scheme aligns with the measure as it will service the current and future transport needs of Dublin. It enhances active travel networks and thus encourages the use of these modes reducing reliance on the private car.
Measure INT6 - Interchange	*'It is the intention of the NTA, in conjunction with local authorities and transport operators, to ensure that passengers wishing to change between services on the transport network are provided with a safe, convenient and seamless interchange experience.'*	The Proposed Scheme aligns with the measure as it will enhance the interchange between the various modes of public transport operating in the city and wider metropolitan area, both now and in the future. The design has been developed with this in mind and, in so far as possible, is seeking to provide for improved existing or new interchange opportunities with other transport services. These include: • Existing and future Dublin Bus services at numerous locations along the route; • Future bus service proposals including Spine A associated with the New Dublin Area Bus Network; • MetroLink high-frequency rail line running from Swords to Charlemont linking Dublin Airport, Irish Rail, DART and Luas services; • Greater Dublin Area Cycle Network Plan (GDACNP); • Future public transport proposals such as DART Plus scheme at Drumcondra; • Interface with New Dublin Area Bus Network; • Griffith Avenue Protected Cycle Lane Scheme; • Santry River Greenway; and • Royal Canal Greenway.
Measure INT19 – Travelling at Night	*'The NTA will work with transport operators, local authorities and An Garda Síochána to improve security and perceptions of security for people using public transport, and walking and cycling at night by improving lighting at public transport stops and stations and along access points to and from stops, assisting local authorities to design in passive surveillance and high quality lighting along pedestrian routes, and to reduce anti-social behaviour around stops and stations.'*	The Proposed Scheme has considered security and safety in its design, and it provides lighting as appropriate to the end use. The Proposed Scheme will include upgrades to existing public lighting. In addition to public lighting, it is proposed to install traffic monitoring cameras at key locations to enable the monitoring of traffic flows along the Proposed Scheme and provide rapid identification of any events that are causing, or are likely to cause, disruption to bus services on the route and to road users in general.
Measure INT20 – Accessible Infrastructure	*'During the period of the Transport Strategy, the NTA will ensure that public transport infrastructure, and facilities in the GDA are made accessible for all users, and that additional resources for the maintenance and repair of lifts are made available.'*	The Proposed Scheme has been designed to include: • More bus shelters, seating, accessible footways and bus infrastructure to make the bus transit experience more accessible for users of all abilities and ages; and

Measure Number	Measure	How the Proposed Scheme meets the Measure
		• Provision and enhancement of cycling facilities along the Proposed Scheme, creating routes that are safe, accessible and attractive for people of all abilities and ages.
Measure INT25 – Construction Management	*The NTA, in conjunction with the local authorities, TII, Irish Rail, and other agencies will ensure that the level of disruption to the transport system and to wider activity throughout the region will be minimized, and that up-to-date travel information is provided during the construction of transport infrastructure projects.*	The Construction Travel Management Plan (CTMP) of the Proposed Scheme will help to ensure that disruption is minimised, with access to houses and businesses maintained.
Measure WALK2 – Improved Footpaths	*The NTA, in conjunction with local authorities, will implement footpath improvement schemes across the GDA where required throughout the period of the Transport Strategy in order to ensure that they are of sufficient width, adequately lit, serve both sides of the road in urban areas (in most cases), are of good quality surfacing, provide for seating at appropriate locations, and are free of unnecessary clutter.* *Footpaths will also be maintained and improved in a manner which contributes positively to the public realm.*	Along the Proposed Scheme improvements and enhancements will be made to footpaths, walkways, and pedestrian crossings. Additional landscaping and outdoor amenities will be provided to improve the local urban realm. Several urban realm upgrades, including widened footpaths, high quality hard and soft landscaping and street furniture will be provided in areas of high activity to contribute towards a safer, more attractive environment for pedestrians.
Measure WALK4 – Improved Junctions	*'The NTA, in conjunction with local authorities, will implement junction improvements across the GDA as follows:* *• To enhance safety at junctions, a programme of "narrowing" junctions by reducing kerb-line radii will be undertaken as a means of managing vehicular speeds; and* *• To enhance movement by pedestrians and cyclists, a programme of removal of slip lanes will be undertaken at appropriate locations, together with consideration of junction signaling changes to better balance the use of the junction between motorised and vulnerable modes, and in urban areas, junctions will be designed so as footpaths on side roads will be carried through at-grade, where practicable and safe to do so.'*	The Proposed Scheme provides infrastructure that will support sustainable transport and will improve the safety of road users through junction improvement and the segregation of road vehicles and active travel modes, where possible. The design of each junction has given priority to pedestrian, cycle and bus movements. Junctions have been designed to ensure a high level of comfort and priority for sustainable modes of travel e.g. walking, cycling and public transport by prioritising the space and time allocated to these modes within the operation of a junction.
Measure WALK9 – Disabled People	*'Local authorities in the GDA and the NTA will take full account of disabled people and pedestrians with mobility impairments when delivering transport schemes which affect the pedestrian environment; and will implement improvements to existing facilities where appropriate and encourage the enforcement of the Road Traffic Laws in this regard.'*	A Disability Audit of the existing environment and proposed draft preliminary design for the corridor was undertaken. The Audit provided a description of the key accessibility features and potential barriers to disabled people based on the Universal Design standards of good practice. The Audit was undertaken in the early design stages with the view to implementing any key measures identified as part of the design development process. This audit has informed the design of the Proposed Scheme. The audit assessed footpaths, crossings / junctions, bus stops, parking and access for users with disabilities. Traffic signal layout design included accessibility considerations for the mobility impaired. Potential areas of conflict with other non-motorised users were considered to provide suitable separation where possible. It has been designed to include: • The interaction between pedestrians, cyclists, and buses at bus stops. The Proposed Scheme has prioritised the use of island bus stops, including signal call button for crossing of cycle tracks, to manage the interaction between the various modes with the view to providing a balanced safe solution for all modes; and • Clear segregation of modes at key interaction points along the Proposed Scheme which was highlighted as a potential mobility constraint in the Audit.
Measure CYC1 – GDA Cycle Network	*'It is the intention of the NTA and the local authorities to deliver a safe, comprehensive, attractive and legible cycle network in accordance with the updated Greater Dublin Area Cycle Network.'*	The Proposed Scheme aligns with the policy objective as it provides of segregated cycling facilities along the Proposed Scheme in both directions. These high-quality cycle track will generally be 2m in width offering a high level of

Measure Number	Measure	How the Proposed Scheme meets the Measure
		service and help to reduce dependency on private car use for short journeys.
Measure CYC5 – Cycle Parking	*It is the intention of the NTA to deliver, through the statutory planning process and liaison with relevant stakeholders, high quality cycle parking at origins and destinations, serving the full spectrum of cyclists including users of non-standard cycles.*	Cycle parking is provided in a number of locations throughout the Proposed Scheme such as at some bus stop locations, where space is available.
Measure CYC14 – Supporting Measures for Cycling	*'The NTA will monitor new developments related to supporting measures for cycling including emerging technologies, infrastructure, policies and programmes, with a view to their implementation in the GDA.'*	The Proposed Scheme has been designed in line with guidance documents and design standards relating to the design of urban streets, cycling facilities and urban realm.
Measure PT2 – Climate Proofing New Public Transport Infrastructure	*'The NTA will ensure that all new public transport infrastructure is proofed for resilience against the potential impacts arising from climate change.'*	The Proposed Scheme aligns with the measure as it comprises transport infrastructure that supports the delivery of an efficient, low carbon and climate resilient public transport service. Design principles included exploring opportunities for sustainable urban realm and landscape design responses such as SuDS, species rich planting and reusing materials, where possible. SuDS measures were designed to attenuate runoff for any newly paved areas. SuDS measures were designed to provide sufficient storage to ensure no increase in existing runoff rates.
Measure BUS1 – Core Bus Corridor Programme	*'Subject to receipt of statutory consents, it is the intention of the NTA to implement the 12 Core Bus Corridors as set out in the BusConnects Dublin programme.'*	The Proposed Scheme is part of the BusConnects programme to enhance bus services and active travel options in the Greater Dublin Area.
Measure BUS12 – New Bus Stops and Shelters	*'It is the intention of the NTA to continue to roll-out the programme of bus stop and shelter provision, and to monitor potential for further expansion and upgrade during the lifetime of the strategy.'*	The Proposed Scheme includes additional bus shelters, seating, accessible footways and bus infrastructure to make the bus transit experience more accessible for users.
Measure ROAD13 – Roadspace Reallocation	*'The local authorities and the NTA will implement a programme of road space reallocation from use by general traffic or as parking to exclusive use by sustainable modes as appropriate, as a means of achieving the following:* • *Providing sufficient capacity for sustainable modes;* • *Improving safety for pedestrians and cyclists; and* • *Encouraging mode shift from the private car and reducing emissions'.*	The Proposed Scheme reallocates road space for bus priority and cycling infrastructure. It will provide the infrastructure to deliver a modal shift from private car usage to sustainable transport.
Measure TM2 – Management of Urban Centres	*'The NTA and relevant local authorities, in collaboration, will deliver the public transport, cycling and walking networks, and public realm that are required to serve local centres, and to facilitate a post-Covid recovery based on sustainable transport.'*	The Proposed Scheme aligns with the measure as it will support sustainable transport modes through infrastructure improvements for active travel (both walking and cycling). The Proposed Scheme will bring greater accessibility to the city centre and other strategic areas for people to avail of housing, jobs, amenities and services. It aims to mitigate any adverse effects that the proposals may have on the streets, spaces, local areas and landscape through the use of appropriate design responses. In addition, opportunities have been sought to enhance the public realm and landscape design where possible.
MEASURE CLIMATE3	*Through the implementation of the full measures set out in this strategy, in combination with the plans and programmes of Government, the NTA will contribute to a reduction in CO2 emissions from transport in the GDA to below 1 MtCO2eq by 2042.*	The Proposed Scheme aligns with the objective through the development of transport infrastructure that supports the delivery of an efficient, low carbon and climate resilient public transport service. A greater increase in sustainable mode share will in turn lead to further reductions in GHG emissions, beyond those reported in the assessment. The Proposed Scheme has the potential to reduce GHG emissions equivalent to the removal of approximately 21,130 and 22,150 car trips per weekday from the road network in 2028 and 2043 respectively. This represents a significant contribution towards the national target of 500,000 additional trips by walking, cycling and

Measure Number	Measure	How the Proposed Scheme meets the Measure
		public transport per day by 2030 as outlined as a target in the Government's 2021 Climate Action Plan.

CPO-28 – The Coach Ltd

Summary of Objections Raised

The objection to the CPO raises nine potential issues, and requests an oral hearing:

i) Surplus Land Acquisition

The property owner objects to the acquisition of lands which appear to be surplus for the scheme requirements. The objection considers that the acquisition of the areas in the CPO is excessive and appears unnecessary.

ii) Drainage

The property owner is concerned in relation to drainage implications associated with the works on the public road, particularly that they may negatively impact their retained property and parking areas.

iii) Noise

The objection alleges that inadequate information has been provided regarding the mitigation measures that are being proposed to control increased noise pollution from the intensive bus corridor.

iv) Access

The property owner has serious concerns in relation to the access to the retained property during and post construction. Insufficient detail is considered to have been provided in this regard. The objection considers that there would be a significant negative consequence if there is any negative impact on access arrangements during and post construction.

v) Traffic Management

The objection alleges that there is a lack of detail in relation to how traffic will be managed during the construction phase.

vi) Boundary Treatment

The objection considers that there is a lack of clarity in relation to the new boundary along the permanent acquisition area, and that there is a lack of clarity with regard to hoarding or proper temporary boundary treatments which will be essential in relation to health and safety.

vii) Environmental Impacts

There is concern within the objection that there is a lack of clarity around what the total environmental impact will be of the BusConnects scheme including the environmental impact and upfront carbon footprint for the construction phase. The owners have a concern in relation to the design of the scheme and the route that has been chosen.

viii) Footpaths/Cycle Paths

Concern there is a lack of clarity in relation to the impact of the scheme on footpaths and cycle paths.

ix) Other matters and proper planning and sustainable development

The objection considers that other relevant matters may arise when more detailed design information is made available, and the owner reserves the right to raise and deal with these matters at an Oral Hearing. In particular the objection considers that there are significant issues and concerns around proper planning and sustainable development of the area arising from the Proposed Scheme.

Response to Objections Raised

i) Surplus Land Acquisition

The Proposed Scheme has been designed to deliver upon the scheme objectives set out in Chapter 1 of the EIAR, which include enhancement of the potential for cycling by providing safe infrastructure for cycling. In some areas, land acquisition is required to deliver what has been determined to be the most appropriate design configuration that meets the scheme objectives. All areas included in the CPO have been carefully considered and only included where deemed absolutely necessary to meet the scheme objectives and to construct the scheme with permanent and temporary acquisitions respectively.

In this specific area, the proposed cross-section and subsequent land acquisition have been considered and deemed necessary to facilitate the optimum scheme as presented in EIAR Volume 3 Chapter 4 Proposed Scheme Description Figures, General Arrangement drawings.

The temporary land take at this property is required to ensure that sufficient space is available to construct the Proposed Scheme and to tie into the levels of the Proposed Scheme as depicted in General Arrangement Drawing Sheet 06 of 37 of the EIAR Volume 3 Figures Chapter 4 Proposed Scheme Description, General Arrangement drawings. Any land that is temporarily acquired will be returned to the owner. It is intended that boundaries and accesses will be replaced on a like for like basis.

Typically along the Proposed Scheme a 2.0-3.0m working room offset for temporary land take is required to ensure there is sufficient space available to construct the Proposed Scheme and boundary treatments. At this location, additional temporary land take is proposed to reinstate the boundary wall with a low stone wall and to regrade the accesses and existing carpark to tie into the levels of the Proposed Scheme as depicted in General Arrangement Drawing Sheet 07 of 37 and Landscape General Arrangement Sheet 07 of 37 (see Figure 2.31) of the EIAR Volume 3 Figures Chapter 4 Proposed Scheme Description drawings. Any land that is temporarily acquired will be returned to the owner. It is intended that boundaries and accesses will be replaced on a like for like basis.

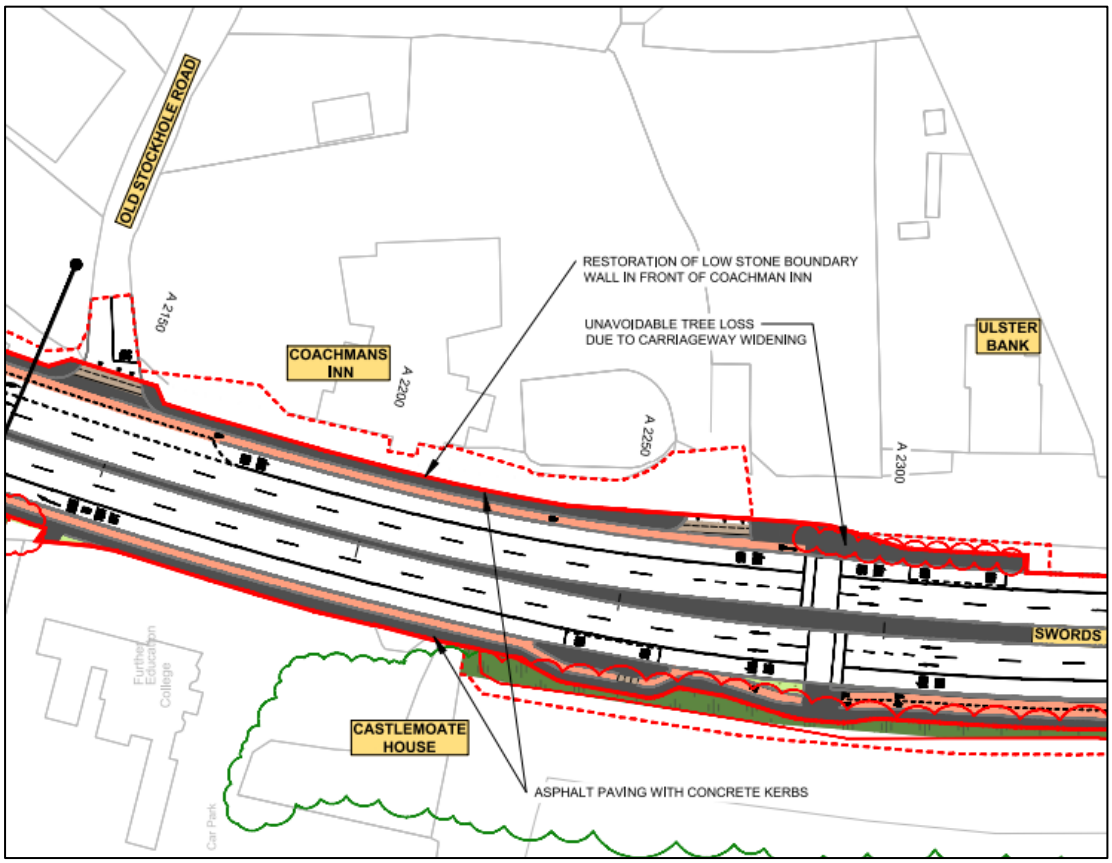

Figure 2.31 Proposed Landscape General Arrangement at the Coachmans Inn (Sheet 07)

ii) Drainage

A Flood Risk Assessment was undertaken for the Proposed Scheme and is included as Appendix A13.2 (Flood Risk Assessment) in Volume 4 Part 3 in the EIAR. The Proposed Surface Water Drainage Works drawing series in Volume 3 (Figures) of the EIAR provides information in relation to drainage and the proposed drainage design.

Section 4.6.15 of Chapter 4 (Proposed Scheme Description) in Volume 2 of the EIAR describes the approach taken to drainage design for newly paved areas. In particular, the principal objectives of the drainage design are described in Section 4.6.15.5 as follows:

- '*All drainage structures for newly paved areas are designed with a minimum return period of no flooding in 1:30 years with a 20% climate change allowance;*
- *A SuDS drainage strategy has been developed for all newly paved areas in accordance with the SuDS hierarchy. SuDS are provided to ensure no increase on existing runoff rates from new paved areas will also provide a level of treatment before discharging into the existing network system; and*
- *Infiltration rates were assumed to be zero for calculating the required attenuation volumes for SuDS measures. This is a conservative approach and ensures SuDS measures are not knowingly undersized at this stage of the design. Where necessary, permeability tests will be completed so that infiltration rates can be considered in further design*.'

Supplementary information is also provided in Appendix K Drainage Design Basis Document of the Preliminary Design Report.

At the location of The Coachmans Inn, there is no additional catchment areas proposed directly outside the business, however there is some road widening as part of the Proposed Scheme in close proximity to the business. This will result in additional catchment areas on both the inbound and outbound carriageways. Oversized pipes and storm water pipes are proposed as part of the surface water drainage works to drain any additional surface water from the newly paved areas. The details of the proposed drainage are indicated on the Surface Water Drainage Works drawings in the EIAR, Volume 3, Figures, Chapter 4 Proposed Scheme Description, 11. Proposed Surface Water Drainage Works, shown in Figure 2.33.

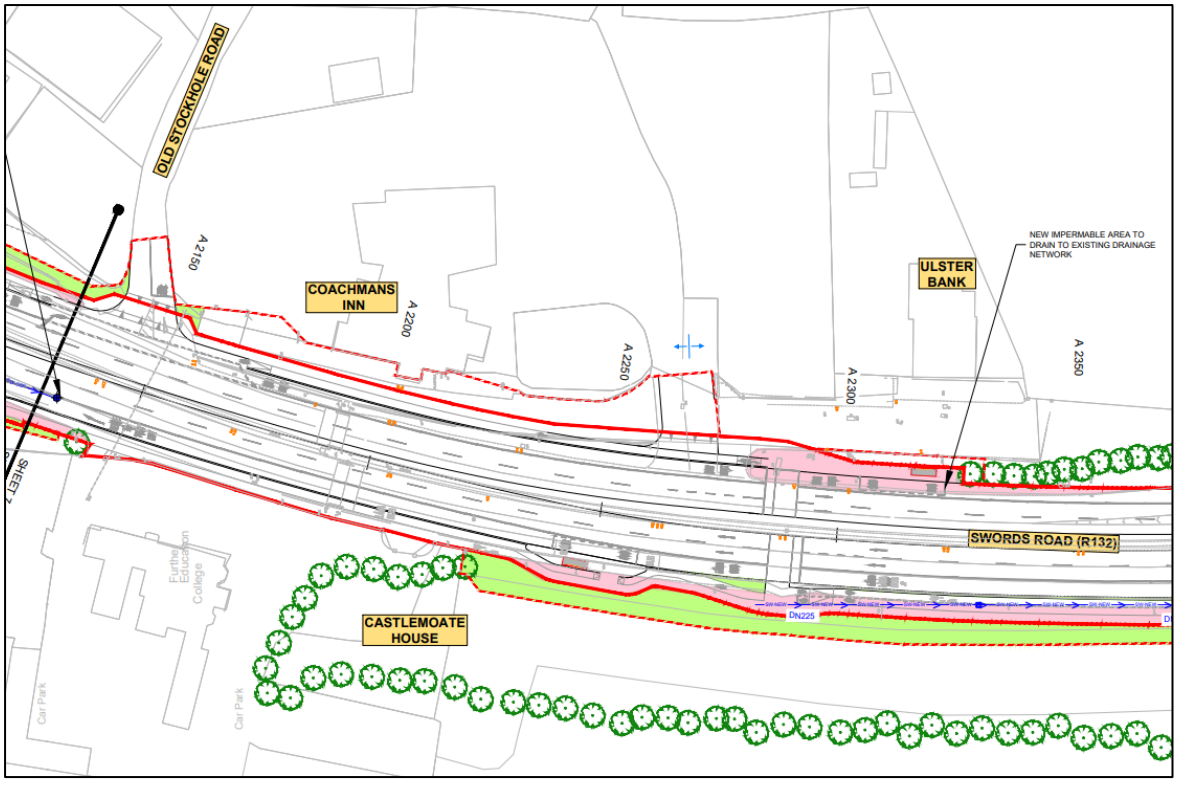

Figure 2.32 Proposed Surface Water Drainage Works at The Coachmans Inn (Sheet 07)

iii) Noise

Regarding the noise impact of the Proposed Scheme, Section 9.4.4.1 of EIAR Volume 2 Chapter 9 Noise and Vibration provides details of the assessment undertaken for the Operational Phase of the Proposed Scheme in respect of the potential noise and vibration impacts associated with altered traffic flows, realigned traffic lanes and displaced traffic flows.

Section 9.4.4.1.1.5 states that '*Along the majority of roads of the Proposed Scheme within the 1km study area, impacts as a result of traffic redistribution are determined to be Indirect, Positive, Imperceptible to Slight to Moderate, and Short to Medium Term to Negative, Moderate, and Short to Medium term once the Proposed Scheme becomes operational*.' It goes on to state that '*There are a small number of roads in the overall study area where there are potential initial significant impacts. These are defined as roads with a traffic noise level above a daytime noise level of 55 dB LAeq,16hr an increase in noise level greater than 3 dB*.' Table 9.45 lists these roads and the section of Swords Road at the location of The Coachmans Inn is not included in Table 9.45.

Section 9.5.2.1 summarises the change in road traffic noise in the operation phase as follows: 'The impact assessment has determined that there are no calculated significant direct or indirect traffic noise impacts across the study area for the Proposed Scheme. The range of noise level changes and overall noise levels calculated do not require any specific noise mitigation measures to be incorporated into the Proposed Scheme.'

In respect of electric buses, as discussed in Section 9.4.4.1.1.4 of Chapter 9, during the proposed Opening Year (2028), the NTA forecast is for 94% of the city bus fleet to be EVs or HEVs. For the Design Year (2043), the city bus fleet is forecast to be 100% electric. The operation of electric and hybrid buses will eliminate ICE noise from buses accelerating, decelerating and idling at bus stops which is the dominant noise source.

In addition, the characteristic of noise from EVs is subjectively less intrusive compared to those with ICE's and is masked to a much greater extent by surrounding road traffic. It is noted the bus stops along the Proposed Scheme will be used by other bus operators which may not transition to EV and HEVs over the same period as the city bus fleet. The volume of these buses along the Proposed Scheme will, however, be significantly less than the city bus fleet and hence, noise levels associated with these areas will not generate significant noise levels over the prevailing noise environment.

With respect to construction noise impacts, as noted in Figure 9.3 in Volume 3 of the EIAR, a noise impact of Not Significant is forecast along Swords Road in the vicinity of the Coachmans Inn.

The EIAR contains a comprehensive set of mitigation measures to minimise construction phase impacts, including noise impacts. Construction noise mitigation measures are set out in Chapter 9 in Volume 2 of the EIAR (and are also summarised in Appendix 5.1 (Construction Environmental Management Plan) in Volume 4 of the EIAR).

Section 9.5.1.1 of EIAR Volume 2 Chapter 9 states that: *'The appointed contractor will be required to take specific noise abatement measures to the extent required and comply with the recommendations of BS 5228–1 (BSI 2014a) and S.I. No. 241/2006 - European Communities (Noise Emissions by Equipment for Use Outdoors) (Amendment) Regulations 2006.'* It also states that '*During the Construction Phase, the appointed contractor will be required to manage the works to comply with the limits detailed in Section 9.2.4.1 using methods outlined in BS 5228–1 (BSI 2014a)*'

Section 9.5.1.1 also states that *'BS 5228–1 includes guidance on several aspects of construction site practices, which include, but are not limited to:*

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

Specifically, Section 9.5.1.1. states that *'The appointed contractor will put in place the most appropriate noise control measures depending on the level of noise reduction required at individual working areas (i.e. based on the construction threshold values for noise and vibration set out in Table*

9.8: and Table 9.11).' [Note - Table 9.8 of Section 9.2.4.1 of EIAR Chapter 9 sets out the Construction Noise Threshold (CNT) Levels for the Proposed Scheme].

Section 9.5.1.1.4 of Chapter 9 sets out the proposed working hours and states: *'It is envisaged that generally construction working hours will be between 07:00hrs and 23:00hrs on weekdays, and between 08:00hrs and 16.30hrs on Saturdays. Night-time and Sunday working will be required during certain periods to facilitate street works that cannot be undertaken under daytime / evening time conditions.'*

However, the contractor will also have to take account of sensitive receptors (in particular any nearby residential areas). Section 9.5.1.1.4 goes on to state: '*The planning of such works will take consideration of sensitive receptors, in particular any nearby residential areas. Construction activities will be scheduled in a manner that reflects the location of the site and the nature of neighbouring properties. Construction activities / plant items will be considered with respect to their potential to exceed construction noise thresholds at NSLs and will be scheduled according to their noise level, proximity to sensitive locations and possible options for noise control. In situations where an activity with potential for exceedance of construction noise thresholds is scheduled (e.g. road widening and utility diversions or activities with similar noise levels identified in Table 9.42), other construction activities will be scheduled to not result in significant cumulative noise levels'.*

In summary the noise abatement measures set out in the EIAR that the appointed contractor will be required to put in place to comply with the limits detailed in Section 9.2.4.1 using methods outlined in BS 5228–1 will result in appropriate and adequate mitigation measures in respect of construction noise impact at this location during construction.

iv) Access

When roads and streets are being upgraded, there will be some temporary disruption / alterations to on-street and off-street parking provision, and access to premises in certain locations along the Proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. As described in Section 5.5.3.2 of Chapter 5 Construction of Volume 2 of the EIAR, '*details regarding temporary access provisions will be discussed with residents and business owners prior to construction starting in the area. The duration of the works will vary from property to property, but access and egress will be maintained at all times*'.

Additionally EIAR Appendix A5.1 Section 5.2.1.2 states that an objective of the Construction Traffic Management Plan is to ensure disruption is minimised, with access to houses and businesses maintained, as is reasonably practicable in delivering the Proposed Scheme.

During the operational stage, there will be no restrictions to the access as indicated on General Arrangement Drawings in the EIAR, Volume 3, Figures, Chapter 4 Proposed Scheme Description, 03. General Arrangement is shown in Figure 2.33.

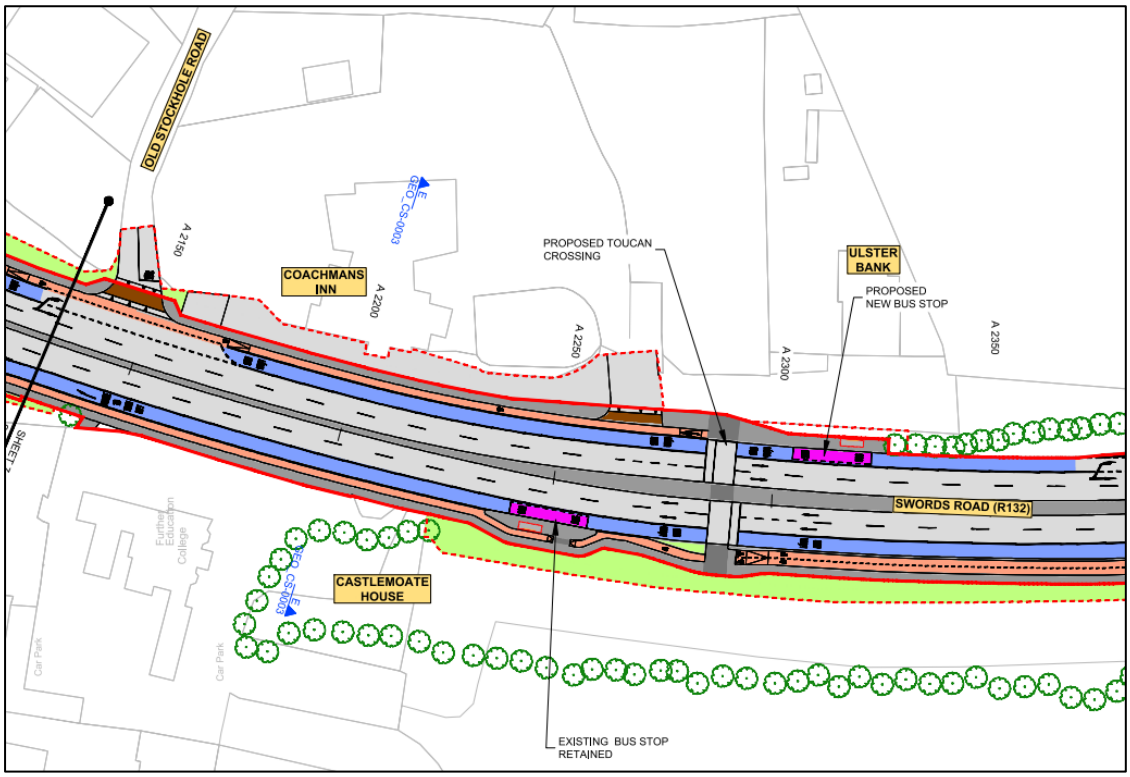

Figure 2.33 General Arrangement of Proposed Scheme at The Coachmans Inn (Sheet 07)

v) Traffic Management

The Coachmans Inn is located within Section 2a of the Proposed Scheme, as described in Section 5.3.2.1 of Chapter 5 Construction of Volume 2 of the EIAR, '*Section 2a encompasses a length of approximately 1,920m along Swords Road, between Airside Junction and (Dublin) Airport Roundabout. The construction activities at Section 2a will comprise conversion of the Cloghran roundabout to a signalised junction, pavement reconstruction and resurfacing of the roads, footpaths, and cycle tracks, and new kerbs. Construction activities will also consist of additional signage, new road markings, new and amended traffic signal infrastructure, new street furniture and landscaping works. A principal retaining wall (RW022) will be constructed north of the Cloghran Junction, approximately 50m in length and maximum 2m in retained height. A minor retaining wall (RW026) will be constructed opposite Metro Point Business Park, approximately 30m in length. A minor retaining wall (RW027) will be constructed along Swords Road, south of Cloghran Junction, approximately 85m in length. Boundary walls will be constructed, and gates will be relocated along Swords Road, north and south of the Airside Junction. Fencing will also be constructed along Swords Road, between Kettles Lane and Stockhole Road, south of Cloghran Junction, and along Castlemoate House. The Construction Compound (SW1) will be located at the Cloghran Junction. Utility (telecommunications infrastructure) diversions and/or protections will be required. The expected construction duration will be approximately 18 months.'* It should be noted however, that construction activities at individual plots will have shorter durations than outlined in overview of construction works presented Section 5.3.

Section 5.5.2.3 of Chapter 5 Construction notes that prior to commencing the construction works described above within a sub-section of the Proposed Scheme, temporary traffic management measures will be installed. '*The temporary traffic management measures, including measures for pedestrians, cyclists, public transport users, general traffic, proposed lane closures, road closures and diversions are discussed in detail in Section 5.8. Temporary traffic management signage will be put in place in accordance with the requirements of the Department of Transport's Traffic Signs Manual, Chapter 8, Temporary Traffic Measures and Signs for Roadworks (hereafter referred to as the Traffic Signs Manual) (Department of Transport, Tourism and Sport 2019). Further information is also provided in the Construction Traffic Management Plan (CTMP) in Appendix A5.1 CEMP in Volume 4 of this EIAR.'*

As set out in Section 5.8.3 of Chapter 5 Construction, road closures and diversions will need to be carried out during the Construction Phase of the Proposed Scheme, however these measures will be minimised wherever possible. As set out in Section 8 of Appendix A6.1 Traffic Impact

Assessment, general traffic redistribution is not anticipated to be a significant issue during the construction phase, however there will be a requirement for some localised temporary road closures for short durations of the daytime and / or night-time. Therefore, the impact on general traffic redistribution is anticipated to be a Medium Negative impact.

vi) Boundary Treatment

The NTA notes the comment raised in relation to Boundary Treatment. Additional information has been provided below.

In regard to Boundary Treatments NTA recognises the importance of maintaining the character of the streetscape where boundary adjustments are required. In the Supplementary Information section of the planning application documentation, Section 13.5 of the Preliminary Design Report outlines the approach to maintaining boundary treatment character. This is also reflected in Chapter 5 (Construction) in Volume 2 of the EIAR, where Section 5.5.2.1 states:

'*Boundary works will be commenced where both permanent and temporary land acquisition is required to ensure that sufficient space is available to construct the Proposed Scheme. Boundary treatments will be carried out on a section-by-section basis (with sections/sub-sections defined in Section 5.2, and in line with the traffic management stages set out in Section 5.8.3.*

This will be a mixture of boundary walls/fencing along industrial/commercial land, railings along parks and temporary boundaries, as required. Any land temporarily acquired from a landowner will only be utilised for the purposes of undertaking boundary works or accommodation works related to the land in question.

Any lands acquired temporarily to facilitate construction work will be returned to landowners on completion of the works. Existing boundary walls or fencing being relocated will be constructed to match the existing conditions, unless otherwise agreed. The removal of trees, vegetation, lawns, paving etc. will be minimised in so far as practicable.'

Chapter 17 (Landscape (Townscape) & Visual) in Volume 4 of the EIAR also addresses boundary treatments, stating in Section 17.4.1 that:

'*New boundaries will be established on the setback line to match the existing boundary. The construction and provision of the new boundaries will take account of the location of existing trees, other plantings, gradients, drainage, property features and access arrangements so as to minimise additional indirect effects. Where practicable, existing railings, gates, cut stone walls and/or piers (or where appropriate, elements of same) to be removed will be reinstated on the new setback boundary line subject to discussion between the landowner and the NTA*'.

The NTA will prepare detailed accommodation works plans in consultation with impacted landowners upon confirmation of the CPO by An Bord Pleanála. Section 4.6.18.1 of Chapter 4 (Proposed Scheme Description) in Volume 2 of the EIAR describes the approach for boundary treatment:

'*To maintain the character and setting of the Proposed Scheme, the approach to undertaking the new boundary treatment works along the corridor is replacement on a 'like for like' basis in terms of material selection and general aesthetics, unless a section of street can benefit from urban improvement appropriate to the area*'.

vii) Environmental Impacts

With regard to environmental impacts for the Proposed Scheme, the Environmental Impact Assessment Report (EIAR) has assessed these impacts in each of the assessment chapters and summarised in Table 23.1: Summary of Significant Residual Impacts from the Construction and Operational Phases of the Proposed Scheme of the EIAR Volume 2 of 4 Main Report for the operational phase. It is noted that for;

- **Fauna and Flora** – this is assessed in Chapter 12 Biodiversity of the EIAR. As stated in Section 12.6.2 following the implementation of the mitigation measures the Proposed Scheme will not result in any significant residual effects during the Operational Phase.

- **Soil** – this is assessed in Chapter 14 Land Soils Geology & Hydrogeology of the EIAR. As stated in Section 14.6.2 no significant residual impacts on land, soils, geology and hydrogeology as a result of the operation of the Proposed Scheme
- **Water** – this is assessed in Chapter 13 Water of the EIAR. As stated in Section 13.6.2 no significant residual impacts have been identified in the Operational Phase of the Proposed Scheme.
- **Air** – this is assessed in Chapter 7 Air Quality of the EIAR. As stated in Section 7.6.2 overall it is considered that the residual impacts of the Proposed Scheme's Operational Phase will be Neutral and Long-Term.
- **Climate** – this is assessed in Chapter 8 Climate of the EIAR. As stated in Section 8.8.2 the Proposed Scheme will make a significant contribution to reduction in carbon emissions.
- **Landscape** – this is assessed in Chapter 17 Landscape (Townscape) & Visual of the EIAR. As noted in Section 17.6.2 the impact on non-residential properties included in permanent acquisition (e.g. business, commercial, hotel etc.) is deemed to be negative moderate/significant and short-term.
- **Population** – this is assessed in Chapter 10 Population and in Appendix A10.2 of the EIAR. As noted in Section 10.6.2 the Proposed Scheme will deliver positive impacts in terms of accessibility to commercial businesses for pedestrians, cyclists and bus users during the operational phase.

Specifically in relation to the carbon footprint of the construction phase, Section 8.8.2 of Chapter 8 Climate of volume 2 of the EIAR states:

'The Proposed Scheme is estimated to result in total Construction Phase CO2e emissions of 8,396 tonnes embodied CO2eq for materials over a 36-month period. The IEMA Guidance (IEMA 2022) states that 'Carbon budgets allow for continuing economic activity, including projects in the built environment, in a controlled manner'. Thus, projects which have a carbon footprint are not necessarily significant provided that the projects are compatible with net zero by 2050, and the full range of mitigation measures are employed to minimise the carbon footprint. Given that the construction of the Proposed Scheme itself will lead to operational GHG emission reductions overall, then the Construction Phase should be viewed as compatible with net zero emission targets. Thus, the assessment of significance for the Construction Phase of the Proposed Scheme is deemed to have a minor adverse impact, given that the Construction Phase emissions are equivalent to an annualised total of 0.007% of Ireland's non-ETS 2020 target and 0.047% of the 2030 Transport Emission Ceiling. The potential impact to climate due to embodied carbon emissions during the Construction Phase, prior to mitigation, will be Negative, Minor and Short-Term.'

x) Footpaths/Cycle Paths

As referenced in the EIAR Section 3.2.3 of the Traffic Impact Assessment Report (Volume 4 Appendices Part 1 of 2, A6.1 Transport Impact Assessment Report), the recently published National Investment Framework for Transport in Ireland (NIFTI) sets out a hierarchy of travel modes to be accommodated and encouraged when investments and other interventions are made. Sustainable modes, starting with active travel (walking, wheeling and cycling) and then public transport, will be encouraged over less sustainable modes such as the private car. This aligns with the core objectives of the Proposed Scheme.

Chapter 4 Proposed Scheme Description of the EIAR outlines the design principles associated with the Core Bus Corridor. It has been designed following guidance relating to the design principles for urban streets, bus facilities, cycle facilities and public realm. Figure 2.34 shows the typical road layout proposed for the Core Bus Corridor.

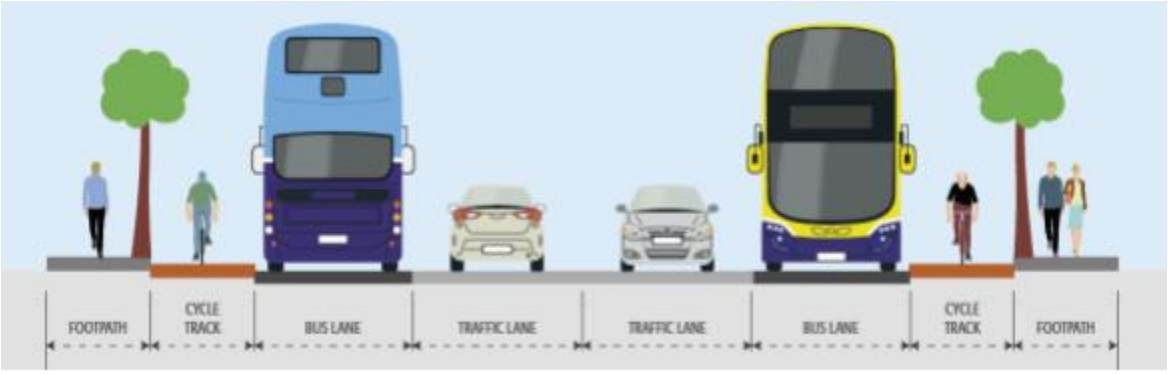

Figure 2.34 Typical Road Layout

Cycling Provision

Section 5.3.3.2 of the Traffic Impact Assessment describes the cycling infrastructure proposals between Airside Junction and Northwood Avenue.

Section 4.6.3 of Chapter 4 of Volume 2 of the EIAR describes the preferred provision of dedicated cycle facilities along the route:

'The 'preferred cross-section template' developed for the Proposed Scheme includes protected cycle tracks, providing vertical segregation from the carriageway to the cycle track and vertical segregation from the cycle track to the footpath.'

The desirable minimum width for a single-direction cycle track is two metres. Figure 2.35 shows the typical arrangements of a fully segregated cycle track provided alongside the adjacent bus lane and footpath.

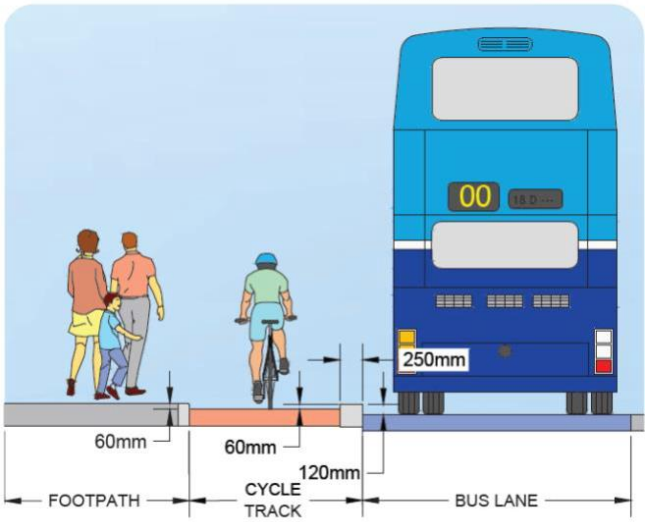

Figure 2.35 Typical arrangements of fully segregated cycle track

Pedestrian provision

Section 5.3.3.1 of the Traffic Impact Assessment describes the pedestrian infrastructure proposals between Airside Junction and Northwood Avenue.

Enhancements for pedestrians are made through the provision of upgraded footpath facilities located adjacent to fully segregated cycle track. The footpath is vertically segregated from the cycle track by a kerb with an upstand height of 60mm. As stated in section 4.6.2 of the EIAR:

'The desirable minimum width for a footpath is 2.0m. This width should be increased in areas catering for significant pedestrian volumes where space permits. DMURS defines the absolute minimum footpath width for road sections as 1.8m based on the width required for two wheelchairs to pass each other. Building for Everyone: A Universal Design Approach (NDA 2020), defines

acceptable minimum footpath widths at specific pinch points as being 1.2m wide over a two-metre length of path.'

Junctions have been designed to facilitate a high level of safety, comfort, and priority for sustainable modes of travel (i.e. walking and cycling) and for public transport by prioritising the space and time allocated to these modes within the operation of a junction.

viii) Other matters and proper planning and sustainable development

Regarding the objectors concerns around proper planning and sustainable development of the Proposed Scheme, the Transport Strategy for the Greater Dublin Area 2022-2042 (hereafter described as the GDATS) was published for consultation on the 9 November 2021 and has been prepared in accordance with Section 12 of the Dublin Transport Authority Act 2008 (as amended). It was adopted in January 2023 and replaces the previous Transport Strategy for the Greater Dublin Area 2016 – 2035. Under the Dublin Transport Authority Act 2008, the NTA must review its Transport Strategy every six years. The GDATS is considered to be an essential component for the orderly development of the GDA for the next 20 years. The overall aim of the strategy is *'To provide a sustainable, accessible and effective transport system for the Greater Dublin Area which meets the region's climate change requirements, serves the needs of urban and rural communities, and supports the regional economy'*. A key focus of the strategy is to enable increased use of other transport modes to meet environmental, economic and social objectives related to emissions, congestion and car dependency. It sets a clear direction towards a 50% reduction in CO2 emissions within the GDA area by 2030. The Transport Strategy report and background documents can be downloaded from the following website:

https://www.nationaltransport.ie/planning-and-investment/strategic-planning/greater-dublin-area-transport-strategy/ .

The GDATS sets out a range of measures and those of relevance to the Proposed Scheme are outlined in Table 2.6. The GDA Transport Strategy 2022 - 2042 (NTA 2022) puts the delivery of Dublin BusConnects, of which the Proposed Scheme is part, at the heart of its objectives. There is added emphasis on the delivery of public transport, active travel and enhanced accessibility to sustainable modes of transport, all of which the Proposed Scheme will help to deliver.

Table 2.7 GDA Transport Strategy 2022 – 2042 Measures

Measure Number	Measure	How the Proposed Scheme meets the Measure
PLAN2 – The Road User Hierarchy	*The NTA, in the decision-making process around the design, planning and funding of transport schemes in the GDA, will be guided by the priority afforded to each mode in the Road User Hierarchy as set out in the Transport Strategy.'*	The Proposed Scheme aligns with the measure as it will promote modal shift from private car to a more sustainable forms of transport. It enhances active travel networks and thus encourages the use of these modes reducing reliance on the private car.
PLAN14 - Urban Design in Major Infrastructure Projects	*'The NTA will incorporate a high standard of urban design and placemaking, taking into account architectural heritage, into the planning and design of all major public transport infrastructure schemes and will consider how greater biodiversity can be fostered.'*	The overall landscape and public realm design strategy for the Proposed Scheme aims to create attractive, consistent, functional and accessible places for people alongside the core bus and cycle facilities. In addition, opportunities have been sought to enhance the public realm and landscape. As part of the Proposed Scheme public realm improvements are proposed at several locations. For example, the Drumcondra Road Upper shopping parade is identified as a local enhancement opportunity to improve the image of the public realm, this includes footway enhancements and upgrades to the parking bays. Similarly, the area in front of The Comet in Santry is proposed to have surface treatment enhancements and de-cluttering and reorganising of the street furniture. All the plants and trees selected will be native species, appropriate to the location. 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.

Measure Number	Measure	How the Proposed Scheme meets the Measure
Measure PLAN15 – Urban Design in Walking and Cycling Projects	*'In the design, planning and prioritisation of walking and cycling schemes, the NTA and the local authorities will ensure the incorporation of urban design and placemaking considerations, taking into account architectural heritage, and will consider how greater biodiversity could be fostered.'*	The overall landscape and public realm design strategy for the Proposed Scheme aims to create attractive, consistent, functional, and accessible places for people alongside the core bus and cycle facilities. Along the route of the Proposed Scheme, improvements and enhancements will be made to footpaths, walkways, and pedestrian crossings. Additional landscaping and outdoor amenities will be provided to improve the local urban realm.
Measure PLAN16 – Reallocation of Road Space	*'The NTA, in conjunction with the local authorities, will seek the reallocation of road space in appropriate locations in Dublin City Centre, Metropolitan towns and villages, and towns and villages across the GDA in accordance with the road user hierarchy, in order to prioritise walking, cycling and public transport use and prioritise the placemaking functions of the urban street network.'*	The Proposed Scheme will support integrated sustainable transport usage through road space reallocation in support of infrastructure improvements for active travel (both walking and cycling), and the provision of enhanced bus priority measures for existing (both public and private) and all future services who will use the corridor. The Proposed Scheme reallocates road space along the route to facilitate full and continuous bus lanes along the north and south quays.
Measure INT3 – Integration of all Modes in Transport Schemes	*'It is the intention of the NTA, in the design and planning of transport schemes, to ensure that the needs of all transport modes are considered, as appropriate, based on the objectives of the scheme and on the road user hierarchy.'*	The Proposed Scheme aligns with the measure as it will service the current and future transport needs of Dublin. It enhances active travel networks and thus encourages the use of these modes reducing reliance on the private car.
Measure INT6 - Interchange	*'It is the intention of the NTA, in conjunction with local authorities and transport operators, to ensure that passengers wishing to change between services on the transport network are provided with a safe, convenient and seamless interchange experience.'*	The Proposed Scheme aligns with the measure as it will enhance the interchange between the various modes of public transport operating in the city and wider metropolitan area, both now and in the future. The design has been developed with this in mind and, in so far as possible, is seeking to provide for improved existing or new interchange opportunities with other transport services. These include: • Existing and future Dublin Bus services at numerous locations along the route; • Future bus service proposals including Spine A associated with the New Dublin Area Bus Network; • MetroLink high-frequency rail line running from Swords to Charlemont linking Dublin Airport, Irish Rail, DART and Luas services; • Greater Dublin Area Cycle Network Plan (GDACNP); • Future public transport proposals such as DART Plus scheme at Drumcondra; • Interface with New Dublin Area Bus Network; • Griffith Avenue Protected Cycle Lane Scheme; • Santry River Greenway; and • Royal Canal Greenway.
Measure INT19 – Travelling at Night	*'The NTA will work with transport operators, local authorities and An Garda Síochána to improve security and perceptions of security for people using public transport, and walking and cycling at night by improving lighting at public transport stops and stations and along access points to and from stops, assisting local authorities to design in passive surveillance and high quality lighting along pedestrian routes, and to reduce anti-social behaviour around stops and stations.'*	The Proposed Scheme has considered security and safety in its design, and it provides lighting as appropriate to the end use. The Proposed Scheme will include upgrades to existing public lighting. In addition to public lighting, it is proposed to install traffic monitoring cameras at key locations to enable the monitoring of traffic flows along the Proposed Scheme and provide rapid identification of any events that are causing, or are likely to cause, disruption to bus services on the route and to road users in general.
Measure INT20 – Accessible Infrastructure	*'During the period of the Transport Strategy, the NTA will ensure that public transport infrastructure, and facilities in the GDA are made accessible for all users, and that additional resources for the maintenance and repair of lifts are made available.'*	The Proposed Scheme has been designed to include: • More bus shelters, seating, accessible footways and bus infrastructure to make the bus transit experience more accessible for users of all abilities and ages; and • Provision and enhancement of cycling facilities along the Proposed Scheme,

Measure Number	Measure	How the Proposed Scheme meets the Measure
		creating routes that are safe, accessible and attractive for people of all abilities and ages.
Measure INT25 – Construction Management	*The NTA, in conjunction with the local authorities, TII, Irish Rail, and other agencies will ensure that the level of disruption to the transport system and to wider activity throughout the region will be minimized, and that up-to-date travel information is provided during the construction of transport infrastructure projects.*	The Construction Travel Management Plan (CTMP) of the Proposed Scheme will help to ensure that disruption is minimised, with access to houses and businesses maintained.
Measure WALK2 – Improved Footpaths	*The NTA, in conjunction with local authorities, will implement footpath improvement schemes across the GDA where required throughout the period of the Transport Strategy in order to ensure that they are of sufficient width, adequately lit, serve both sides of the road in urban areas (in most cases), are of good quality surfacing, provide for seating at appropriate locations, and are free of unnecessary clutter.* *Footpaths will also be maintained and improved in a manner which contributes positively to the public realm.*	Along the Proposed Scheme improvements and enhancements will be made to footpaths, walkways, and pedestrian crossings. Additional landscaping and outdoor amenities will be provided to improve the local urban realm. Several urban realm upgrades, including widened footpaths, high quality hard and soft landscaping and street furniture will be provided in areas of high activity to contribute towards a safer, more attractive environment for pedestrians.
Measure WALK4 – Improved Junctions	*'The NTA, in conjunction with local authorities, will implement junction improvements across the GDA as follows:* *• To enhance safety at junctions, a programme of "narrowing" junctions by reducing kerb-line radii will be undertaken as a means of managing vehicular speeds; and* *• To enhance movement by pedestrians and cyclists, a programme of removal of slip lanes will be undertaken at appropriate locations, together with consideration of junction signaling changes to better balance the use of the junction between motorised and vulnerable modes, and in urban areas, junctions will be designed so as footpaths on side roads will be carried through at-grade, where practicable and safe to do so.'*	The Proposed Scheme provides infrastructure that will support sustainable transport and will improve the safety of road users through junction improvement and the segregation of road vehicles and active travel modes, where possible. The design of each junction has given priority to pedestrian, cycle and bus movements. Junctions have been designed to ensure a high level of comfort and priority for sustainable modes of travel e.g. walking, cycling and public transport by prioritising the space and time allocated to these modes within the operation of a junction.
Measure WALK9 – Disabled People	*'Local authorities in the GDA and the NTA will take full account of disabled people and pedestrians with mobility impairments when delivering transport schemes which affect the pedestrian environment; and will implement improvements to existing facilities where appropriate and encourage the enforcement of the Road Traffic Laws in this regard.'*	A Disability Audit of the existing environment and proposed draft preliminary design for the corridor was undertaken. The Audit provided a description of the key accessibility features and potential barriers to disabled people based on the Universal Design standards of good practice. The Audit was undertaken in the early design stages with the view to implementing any key measures identified as part of the design development process. This audit has informed the design of the Proposed Scheme. The audit assessed footpaths, crossings / junctions, bus stops, parking and access for users with disabilities. Traffic signal layout design included accessibility considerations for the mobility impaired. Potential areas of conflict with other non-motorised users were considered to provide suitable separation where possible. It has been designed to include: • The interaction between pedestrians, cyclists, and buses at bus stops. The Proposed Scheme has prioritised the use of island bus stops, including signal call button for crossing of cycle tracks, to manage the interaction between the various modes with the view to providing a balanced safe solution for all modes; and • Clear segregation of modes at key interaction points along the Proposed Scheme which was highlighted as a potential mobility constraint in the Audit.
Measure CYC1 – GDA Cycle Network	*'It is the intention of the NTA and the local authorities to deliver a safe, comprehensive, attractive and legible cycle network in accordance with the updated Greater Dublin Area Cycle Network.'*	The Proposed Scheme aligns with the policy objective as it provides of segregated cycling facilities along the Proposed Scheme in both directions. These high-quality cycle track will generally be 2m in width offering a high level of service and help to reduce dependency on private car use for short journeys.

Measure Number	Measure	How the Proposed Scheme meets the Measure
Measure CYC5 – Cycle Parking	*It is the intention of the NTA to deliver, through the statutory planning process and liaison with relevant stakeholders, high quality cycle parking at origins and destinations, serving the full spectrum of cyclists including users of non-standard cycles.*	Cycle parking is provided in a number of locations throughout the Proposed Scheme such as at some bus stop locations, where space is available.
Measure CYC14 – Supporting Measures for Cycling	*'The NTA will monitor new developments related to supporting measures for cycling including emerging technologies, infrastructure, policies and programmes, with a view to their implementation in the GDA.'*	The Proposed Scheme has been designed in line with guidance documents and design standards relating to the design of urban streets, cycling facilities and urban realm.
Measure PT2 – Climate Proofing New Public Transport Infrastructure	*'The NTA will ensure that all new public transport infrastructure is proofed for resilience against the potential impacts arising from climate change.'*	The Proposed Scheme aligns with the measure as it comprises transport infrastructure that supports the delivery of an efficient, low carbon and climate resilient public transport service. Design principles included exploring opportunities for sustainable urban realm and landscape design responses such as SuDS, species rich planting and reusing materials, where possible. SuDS measures were designed to attenuate runoff for any newly paved areas. SuDS measures were designed to provide sufficient storage to ensure no increase in existing runoff rates.
Measure BUS1 – Core Bus Corridor Programme	*'Subject to receipt of statutory consents, it is the intention of the NTA to implement the 12 Core Bus Corridors as set out in the BusConnects Dublin programme.'*	The Proposed Scheme is part of the BusConnects programme to enhance bus services and active travel options in the Greater Dublin Area.
Measure BUS12 – New Bus Stops and Shelters	*'It is the intention of the NTA to continue to roll-out the programme of bus stop and shelter provision, and to monitor potential for further expansion and upgrade during the lifetime of the strategy.'*	The Proposed Scheme includes additional bus shelters, seating, accessible footways and bus infrastructure to make the bus transit experience more accessible for users.
Measure ROAD13 – Roadspace Reallocation	*'The local authorities and the NTA will implement a programme of road space reallocation from use by general traffic or as parking to exclusive use by sustainable modes as appropriate, as a means of achieving the following:* • *Providing sufficient capacity for sustainable modes;* • *Improving safety for pedestrians and cyclists; and* • *Encouraging mode shift from the private car and reducing emissions'.*	The Proposed Scheme reallocates road space for bus priority and cycling infrastructure. It will provide the infrastructure to deliver a modal shift from private car usage to sustainable transport.
Measure TM2 – Management of Urban Centres	*'The NTA and relevant local authorities, in collaboration, will deliver the public transport, cycling and walking networks, and public realm that are required to serve local centres, and to facilitate a post-Covid recovery based on sustainable transport.'*	The Proposed Scheme aligns with the measure as it will support sustainable transport modes through infrastructure improvements for active travel (both walking and cycling). The Proposed Scheme will bring greater accessibility to the city centre and other strategic areas for people to avail of housing, jobs, amenities and services. It aims to mitigate any adverse effects that the proposals may have on the streets, spaces, local areas and landscape through the use of appropriate design responses. In addition, opportunities have been sought to enhance the public realm and landscape design where possible.
MEASURE CLIMATE3	*Through the implementation of the full measures set out in this strategy, in combination with the plans and programmes of Government, the NTA will contribute to a reduction in CO2 emissions from transport in the GDA to below 1 MtCO2eq by 2042.*	The Proposed Scheme aligns with the objective through the development of transport infrastructure that supports the delivery of an efficient, low carbon and climate resilient public transport service. A greater increase in sustainable mode share will in turn lead to further reductions in GHG emissions, beyond those reported in the assessment. The Proposed Scheme has the potential to reduce GHG emissions equivalent to the removal of approximately 21,130 and 22,150 car trips per weekday from the road network in 2028 and 2043 respectively. This represents a significant contribution towards the national target of 500,000 additional trips by walking, cycling and public transport per day by 2030 as outlined as a

Measure Number	Measure	How the Proposed Scheme meets the Measure
		target in the Government's 2021 Climate Action Plan.

2.9 Swords Road (Property 255) – CPO-29

2.9.1 Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor, it is proposed to provide a footpath, bus lane and general traffic lane in each direction. It is proposed to redirect cyclists through Lorcan Road and Shanrath Road as a Quiet Street.

The existing road cross section in this location provides a footpath on each side of the road with an advisory cycle lane outbound and one general traffic lane in each direction.

In order to achieve the required cross section of the Proposed Scheme land acquisition is necessary from private properties along this section of Swords Road. As described in Section 4.5.3.1 of Chapter 4 of Volume 2 of the EIAR, the cross-section proposed has been designed so as to minimise the extent of necessary land acquisition.

The land take required is shown in the following:

- relevant extract of the EIAR Volume 3 Chapter 4 Proposed Scheme Description Figures, General Arrangement drawings in Figure 2.36.
- and the existing aerial view in Figure 2.37.

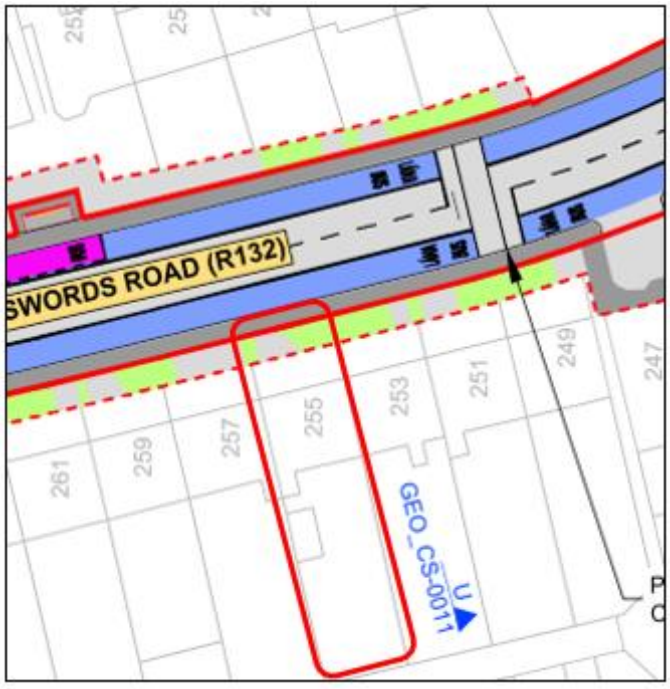

Figure 2.36 Proposed New Layout at Swords Road

Figure 2.37 Existing Aerial View on Swords Road

Summary of Objections Raised

The submission raised the following issues:

1. Health issue

   The submission considers that the proposal to place a CPO on part of their front garden will result in an unacceptable hazard to human health. It is claimed that the buses will be 4 to 5 meters from the respondents front door. Any disturbing activity on a constant basis through the human auric field has a detrimental effect on the cells in the body and in time lead to cancers.

2. Destruction of village streetscape and acceleration of climate breakdown

   The submission claims that the proposed development will cause destruction of the natural street landscape. It is claimed that taking meters from residents gardens is going to accelerate climate change, however marginally.

3. One way system (reducing congestion and saving money) / Why 'two motorways'?

   i) The destruction of Santry Village could have been avoided if the original proposal for a one-way system had been adopted.

   ii) The respondent attended an information evening delivered online by the NTA on 7th December during which they outlined four particular elements underpinning their policies. It is claimed that the below mentioned statements are being ignored by the NTA in relating to opting for a motorway through Santry Village:

      (a) Pedestrians need to be supported for safe walking

      (b) Cars will have to take longer journeys to facilitate other road users

      (c) 90% of respondents to their consultations agree that there needs to be a reduction of the reliance on the private car for travel

      (d) Climate change requirements must be taken into consideration.

4. Why widen in the first place

The submissions questions why widen in the first place as the buses move out of the bus lane as it exists at the moment and into the car lane. No matter how wide the road is made the buses will still have to move into the car lane to cross the Shantalla Road bridge.

It is also queried why is the tree canopy beside the bridge being lifted for a cycle lane. It is claimed that cyclists will still use the main road.

2.9.1.1 Response to issues raised

1. Health issue

It should be noted in the first instance that in the existing situation the edge of the nearest carriageway is approximately 10.3m from the front door of this property. With the Proposed Scheme the carriageway will be approximately 9.2m from the front door of this property, not 4-5m as suggested by the submission. The extent of change proposed at this location will result in only a reduction of 1.1m to the distance between the front door and the street. Typically along the Proposed Scheme a 2.0-3.0m working room offset for temporary land take is required to ensure there is sufficient space available to construct the Proposed Scheme and boundary treatments. At this location, additional temporary land take is proposed to reinstate the boundary wall and to regrade the access to tie into the levels of the Proposed Scheme as depicted in General Arrangement Drawing Sheet 07 of 37 and Landscape General Arrangement Sheet 21 of 37 (see Figure 2.38) of the EIAR Volume 3 Figures Chapter 4 Proposed Scheme Description drawings. Any land that is temporarily acquired will be returned to the owner. It is intended that boundaries and accesses will be replaced on a like for like basis.

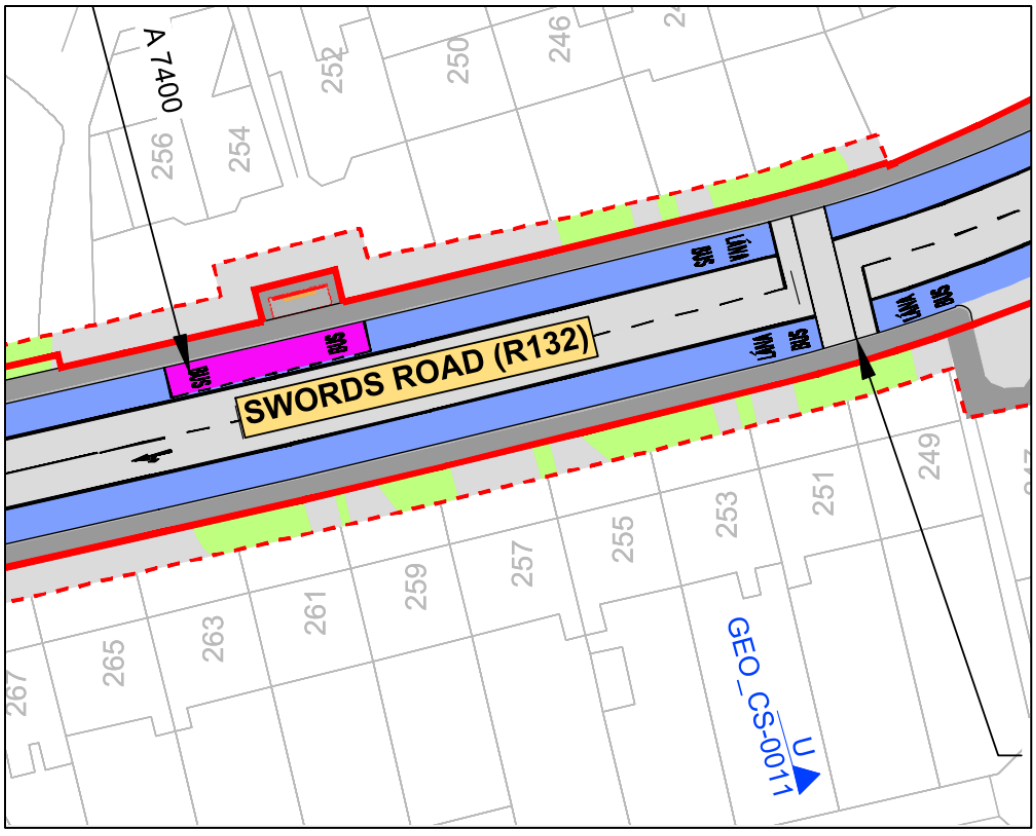

Figure 2.38 General Arrangement of Proposed Scheme at Respondents House (Sheet 21)

Figure 17.2 (Photomontages) in Volume 3 of the EIAR includes a viewpoint looking south along the Swords Road which shows the location of the respondent's house (View 26, Figure 17.2.2.25 for the existing view and Figure 17.2.2.26 for the proposed view (Figure 2.39 below)).

Figure 2.39 Photomontage Proposed View 26 (Figure 17.2 in Volume 3 of the EIAR)

Chapter 11 (Human Health) in Volume 2 of the EIAR describes the assessment of the potential health impacts of the construction and operation of the Proposed Scheme. With respect to the Construction Phase, Section 11.4.3 of Chapter 11 describes the potential impacts of the Proposed Scheme. The most likely health impacts (as summarised in Table 11.6 in Chapter 11) will be psychosocial effects (frustration, annoyance and stress), potential sleep disturbance for shift workers, risk of injury from road collisions as a result of construction traffic management, and potential exacerbation of respiratory conditions due to dust and emissions. All of these impacts would be short-term or temporary while construction is occurring, and will be Not Significant to Moderate impacts.

With respect to the Operational Phase, Section 11.4.4 of Chapter 11 describes the potential impacts. With respect to specific conditions such as cancer, the assessment states the following:

> '*the Proposed Scheme will facilitate increased levels of physical activity among the residential population within the study area. School children may be particular beneficiaries of this new infrastructure due to the presence of schools. The likely level of increase in physical activity to be gained is uncertain but could contribute to approximately 30% to 50% of weekly recommended physical activity on the assumption that the studies can be generalised to this area of Dublin. The health outcomes associated with increased physical activity are:*
>
> - *Reduced risk of stroke and heart disease;*
> - *Reduced risk of hypertension;*
> - *Reduced risk of type 2 diabetes;*
> - *Reduced risk of eight types of cancer;*
> - *Reduced risk of depression;*
> - *Improved cognitive function;*
> - *Reduced risk of dementia;*
> - *Improved musculoskeletal health;*
> - *Improved weight management; and*
> - *Improved mental wellbeing.*'

With respect to specific concerns about noise pollution and vibrational impacts on foundations of houses, Chapter 9 (Noise and Vibration) in Volume 2 of the EIAR assesses the impact of noise and vibration at noise sensitive receptors along the Proposed Scheme. As part of the baseline

noise surveys undertaken for the Proposed Scheme, there was an attended noise monitoring location at the Swords Road / Shanrath Road junction approximately 10m from the Swords Road (Reference Number CBC0002ANML011), in close proximity to the respondent's residence as shown in Figure 9.2 (Sheet 6) in Volume 3 of the EIAR. Figure 9.3 in Volume 3 of the EIAR maps the potential noise impacts associated with the predicted Construction Phase traffic, with the Swords Road at the residence (Sheet 4) mapped with an impact significance rating of Slight-Moderate. Figures 9.4 and 9.5 in Volume 3 of the EIAR map the potential impact significance of traffic noise in the Opening Year (2028) and the Design Year (2043) respectively, with the modelling for the Opening Year giving an impact significance rating of Not Significant on the Swords Road at the residence (Figure 9.4, Sheet 4), with the modelling for the Design Year remaining unchanged at Not Significant (Figure 9.5, Sheet 4).

With respect to vibration impacts on buildings specifically, the assessment as described in Chapter 9 considered both Construction and Operational Phase vibration impacts. Section 9.4.3.3 assessed the potential Construction Phase vibration impacts associated with surface breaking activities given that these activities give the highest potential for vibration during construction. The assessment states that '*vibration impacts during ground breaking activities using heavy breakers have the potential to generate Negative, Slight to Moderate, Temporary effects at distances of 10m from the activity. Beyond 50m from this type of activity, impacts are reduced to Not Significant to Slight and Temporary. For all other works, vibration impacts will be below those associated with perceptible vibration and will be Imperceptible to Not Significant and Temporary. All construction works are orders of magnitude below limits values associated with any form or cosmetic or structural damage for structurally sound or protected or historical buildings or structures*'. As outlined in Section 9.5.1.2 with respect to mitigation measures for vibration impacts during the Construction Phase, '*Vibration from construction activities will be limited to the values set out in Table 9.13 to avoid any form of potential cosmetic damage to buildings and structures*'. Table 9.13 (Chapter 9, Page 13) is provided below.

Table 9.13: Recommended Construction Vibration Thresholds for Buildings

Vibration Limits for Buildings (PPV) at the Closest Part of the Building to the Source of Vibration, at a Frequency of 4Hz		
Building Type	Transient Vibration	Continuous Vibration
Reinforced or framed structures. Industrial and heavy commercial buildings	50mm/s	25mm/s
Unreinforced or light framed structures. Residential or light commercial-type buildings	15mm/s	7.5mm/s
Protected and Historic Buildings *Note 1	6mm/s – 15mm/s	3mm/s – 7mm/s
Identified Potentially Vulnerable Structures and Buildings with Low Vibration Threshold	3mm/s	

Note 1: The relevant threshold value to be determined on a case-by-case basis. Where sufficient structural information is unavailable at the time of assessment, the lower values within the range will be used, depending on the specific vibration frequency.

With respect to specific concerns about air quality, Chapter 7 (Air Quality) in Volume 2 of the EIAR assesses the impact on air quality of both the Construction and Operational Phases at the nearest sensitive receptors to the Proposed Scheme. As part of the baseline air quality surveys undertaken for the Proposed Scheme, there was an was an air quality monitoring location close to the residence at 287 Swords Road (Reference Number CBC0002DT004), as shown in Figure 7.1 (Sheet 2) in Volume 3 of the EIAR. Figures 7.6, 7.7 and 7.8 (Sheet 2) in Volume 3 of the EIAR map the nearest receptors and provides a colour coding corresponding to the potential Construction Phase impact at that location with respect to NO_2 and particulate matter (PM_{10} and $PM_{2.5}$), with the maps showing that the change in pollutant concentrations is Negligible across all three pollutants. Figures 7.3, 7.4 and 7.5 (Sheet 2) in Volume 3 of the EIAR map the same information for the modelled Operational Phase impacts in the Opening Year of 2028, with the impact again showing to be Negligible at that location for particulate matter (both PM_{10} and $PM_{2.5}$), and Negligible to Slight Beneficial for NO_2. Regarding the modelling results for the Operational Phase, it is also stated within the Chapter '*The predictions reported are based on conservative assumptions regarding background pollutant concentrations and the improvement in vehicle emission rates. 2019 background pollutant concentrations have been used to represent 2028 and are likely be lower by the Opening Year (2028), than in 2019. Older fleet projections were used in the absence of a fleet that incorporates the effects of the 2021 Climate Action Plan (Government of Ireland 2021) measures, including a larger proportion of electric*

vehicles planned by the Opening Year (2028) than has been modelled. In reality, total concentrations (and magnitude of change) are likely to be lower than those reported here'.

2. Destruction of village streetscape and acceleration of climate breakdown

In Chapter 12 (Biodiversity) in Volume 2 of the EIAR it describes the habitat types within the Proposed Scheme boundaries, with them mapped in Figure 12.5 in Volume 3 of the EIAR. With respect to the loss of habitat (including in green spaces through Santry), these areas are generally categorised as being of '*Local Importance*', and the Chapter categorises the majority of these areas ('improved amenity grasslands (GA2), planted flowers beds (BC4) and ornamental/non-native shrub (WS3), areas of disturbed ground (ED2 and ED3) and scrub (WS1), hard standing (BL3) and dry meadows and grassy verges (GS2) habitat') as being of '*Lower Value*', while trees and hedgerows are generally of '*Higher Value*'. In Table 12.16 the total extent of habitat loss for the whole Proposed Scheme is quantified with respect to permanent and temporary losses, with such losses generally assessed as being significant losses at the local geographic scale, particularly during the Construction Phase. As part of the mitigation measures for the Proposed Scheme, new planting will be done (new street trees, woodland trees, hedgerows, grasses and other planting) as listed in Section 12.5.1.2.1. There are no significant residual impacts identified in the Chapter as a result of the habitat impacts at this location.

In Chapter 17 (Landscape (Townscape) & Visual) in Volume 2 of the EIAR, Section 17.4.3.1.3 outlines the Construction Phase impact on the townscape and streetscape character in the Northwood Avenue to Shantalla Road section of the Proposed Scheme, stating '*While the construction works will not alter the existing townscape character along this section of the Proposed Scheme the works are extensive and will result in changes to elements of the existing streetscape, most notably through the removal of mature trees*' giving it an impact rating of Negative, Significant and Temporary / Short-Term. The impact specifically on trees and vegetation is described in Section 17.4.3.2.9 listing the route through Santry to Shantalla Road as one of the impacted areas, giving an overall assessment of vegetation removal as being Negative, Moderate / Significant and Temporary / Short-Term during construction. It is proposed to replace as many trees and areas of lost vegetation as possible along the route to compensate for the losses during construction. As a result the impact ratings reduce for the Operational Phase as recorded in Table 17.10 of the Chapter, with the impact on the character of the section changing from Negative, Moderate and Short-Term at one year post-construction to Positive, Moderate and Long-Term at 15 years post-construction after new planting has had time to fully establish.

Chapter 8 (Climate) in Volume 2 of the EIAR has assessed the climate impact as a result of both the construction and operation of the Proposed Scheme. Specifically with respect to tree and vegetation clearance, the impact of this has been assessed under the heading of 'Land Use Change', with the assessment described in Section 8.3.4.1.2 of Chapter 8 as '*The change in land use associated with the Proposed Scheme, including the felling and planting of trees and vegetation, has been calculated using the methodology outlined in Chapter 4 (Forest Land) of the Intergovernmental Panel on Climate Change (IPCC) Guidelines for National Greenhouse Gas Inventories (IPCC 2006). Land use change is also appropriately assessed using the same methodology*'. During the Construction Phase the impact from land use change is recorded in Section 8.5.1.4 as '*The Construction Phase of the Proposed Scheme is predicted to result in the temporary removal of grassland to facilitate a Construction Compound. However, overall, there will be a Negligible impact on carbon sequestration as a result of the Construction Phase of the Proposed Scheme, leading to a Not Significant impact*', with the Operational Phase impact being described in Section 8.5.2.3 as '*The Operational Phase of the Proposed Scheme will not result in any significant changes to land use. Thus, there will be an imperceptible positive impact on carbon sequestration as a result of the Operational Phase of the Proposed Scheme*'.

3. One way system (reducing congestion and saving money)

    i) The Emerging Preferred Route proposed a northbound one-way traffic system between the Omni Park Shopping Centre and the Shantalla Road junction, along with bus lanes in both directions, and a new slip road allowing southbound traffic onto the bypass to exit onto Shantalla at the N1/M50 bridge. As this section of the Swords Road is not wide enough to provide segregated cycle facilities, it was proposed to redirect cyclists through Coolock Lane and to an offline, two-way cycle track adjacent to Oak Park Avenue, running parallel to west of Santry Bypass (N1/M50) and connection at the Shanrath Junction. Following

consultation feedback received from members of the public following the first non-statutory public consultations held from the 14th of November 2018 to the 29th of March 2019, it became apparent that the one-way proposal for general traffic might affect the existing access/egress arrangements for residents along the Lorcan and Shanrath Roads and impact on commercial deliveries and local business.

Section 3.4.1.1 of Chapter 3 of the EIAR set out that design development and assessment work was carried out at the Draft Preferred Route Option Stage on this section of the Proposed Scheme. This is also documented in Section 6.2.2.2 of the Preferred Route Option Report (provided as part of the Supplementary Information of the EIAR), looked at a one-way option through Santry Village, which was considered.

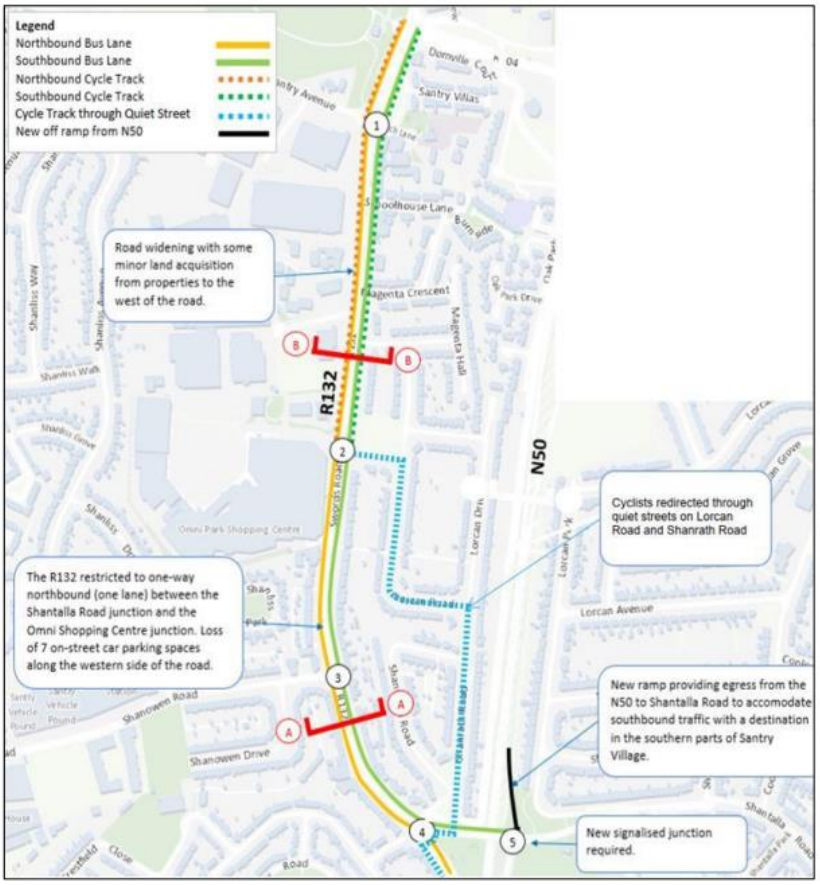

Figure 2.40 One-Way Route Option through Santry Village (Option SY1C)

This option removes southbound traffic between Omni Shopping Centre and Shantalla Road to minimise land acquisition on Swords Road for this section of the scheme. A bus lane would be provided in each direction but only one traffic lane (northbound) would be maintained for general traffic.

Combined with the proposal to redirect cyclists through Lorcan Road and Shanrath Road this option would negate the need for any land acquisition along this section of the scheme.

To allow access from the north to properties in the south of Santry Village, this option would require the construction of a new southbound slip road off the N50 at Shantalla Road. The new slip road would join the Shantalla Road via a new signalised junction.

A cross-section on Swords Road for this scheme option is illustrated in Figure 2.41.

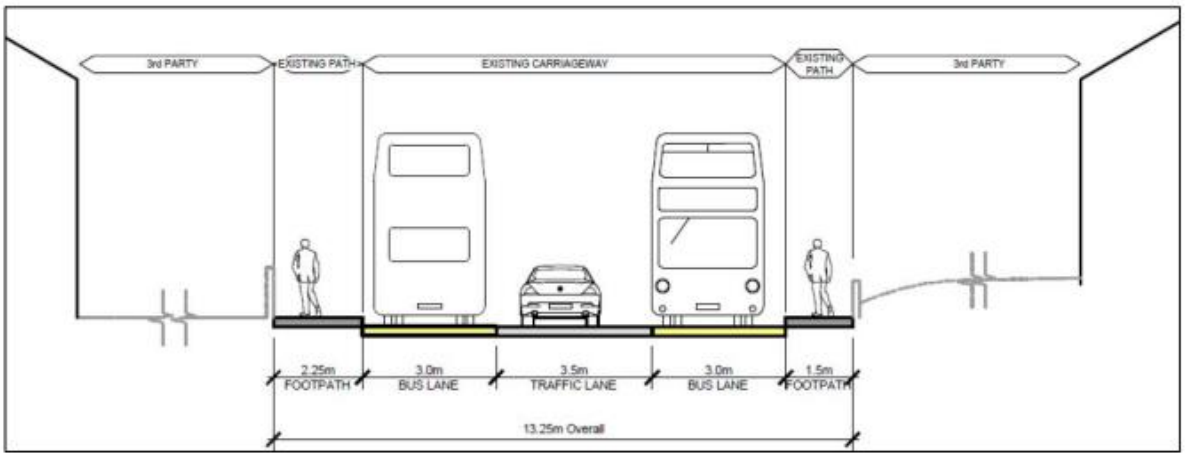

Figure 2.41 SY1C Cross-Section A-A Swords Road South of Omni Shopping Centre

The proposed traffic management changes would have a direct impact on traffic routes to, from and through the southern part of Santry Village.

The Stage 2 Route Options Assessment – Multi-Criteria Analysis table for this section is included in Appendix A of the Preferred Route Option Report.

A summary of the assessment and relative ranking of route options against the five main assessment criteria is presented in Table 2.8 below.

Table 2.8 Santry Village Final Summary of MCA

Assessment Criteria	Option 1 (SY1B) Two-Way Option	Option 2 (SY1C) One-Way Option
Economy		
Integration		
Accessibility and Social Inclusion		
Safety		
Environment		

Signal-controlled bus priority (similar to that adopted at Santry Demesne, see Section 6.2.1 of the Preferred Route Options Report) was also considered as an option through Santry Village, in order to reduce the impact on land take. For signal-controlled bus priority to operate successfully, queue lengths from the next junction cannot be allowed to develop on the shared bus/traffic lane portion, as this would result in delays to the bus service. Junction modelling of this option through Santry Village showed extensive queuing at the Lorcan Road/Omni Park Shopping Centre, Shanowen Road and Shanrath Road junctions, which are in close proximity to each other (300m between the Lorcan Road/Omni Park and Shanowen Road junctions and 250m between the Shanowen Road and Shanrath Road junctions). On this basis, signal-controlled bus priority was discounted as a feasible option through Santry Village.

Based on the following key findings from the Multi-Criteria Assessment undertaken for this section of the study area, Route Option SY1B (two-way option) is the Preferred Route Option for the following reasons:

- It performs more favourably under the Integration criterion because this option requires no changes to the current traffic management regime in Santry. SY1C would require detours and increased journey times for traffic

travelling to and from the north with an origin or destination in the southern parts of Santry and people travelling south from the southern parts of Santry;

- It performs more favourably under the Accessibility and Social Inclusion criterion because under Option SY1C, journey times of the regular trips made by local residents living between the Omni Park Shopping Centre and Shantalla Road/Swords Road Roundabout would be increased.

In addition to the above alternative solution which specific to Santry Village, Chapter 3 of the EIAR sets out the reasonable alternatives studies and the main reasons for the selection of the Proposed Scheme taking into account the effects on the environment. Within this Chapter consideration is given to strategic alternatives including both light rail and metro. Section 3.2.5 of this chapter states that the appropriate type of public transport provision in any particular case is predominately determined by the likely quantum of passenger demand along the particular public transport route.

'For urban transport systems, bus-based transport is the appropriate public transport mode for passenger demand levels of up to 4,000 passengers per hour per direction. (UITP 2009). Light rail provision would generally be appropriate to cater for passenger demand of between 3,500 and about 7,000 passengers per hour per direction. Passenger demand levels above 7,000 passengers per hour per direction would generally be catered for by heavy rail or metro modes, which would usually be expected to serve a number of major origins or destinations along a Particular corridor. In the case of both the bus and light rail modes, higher levels of passenger demand than the above stated figures can be accommodated under specific conditions.

The development of the prior GDA Transport Strategy considered the likely public transport passenger demand levels across the region using the NTA's transport model and took into account the other studies referenced above, in addition to studies that had been carried out to investigate a potential light rail scheme within the area of this corridor. Likely passenger flows were identified to be within the capacity of bus transport, without reaching the quantum of passenger demand which would support the provision of a higher capacity rail solutions in addition to a Metrolink. Section 3.2.1 set out various studies undertaken for the prior GDA Transport Strategy. Arising from these studies and the specific assessment and transport modelling work undertaken for the prior Strategy, it was concluded that a bus-based transport system would be the proposed public transport solution in the corridor of the Proposed Scheme. The proposed transport solution would be supplemented by Metro, to provide more passenger capacity and enhanced interchange between the Luas Red and Green Line Services, proposed Metrolink Station at Fosterstown, Sligo/Maynooth Line Heavy Rail Services at Drumcondra Station and the Suburban Interchange between the Orbital and Radial Routes at Coolock Lane. It was considered that there would be insufficient demand to justify the provision of an additional light rail alternative beyond what is proposed above, particularly given the low to medium density nature of development in this corridor.

Similar to BRT, the light rail option would be worse for the environment in terms of construction impacts, including flora and fauna, heritage, air and noise, compared to the CBC proposal. Light rail requires continuous unbroken physical lane infrastructure to achieve high-priority. This would involve significantly more land take and potentially involve demolition of buildings at pinch-points. In the case of the CBC proposals, bus-priority can be achieved through short lengths at pinch-points by the use of signal controlled priority.

Given the consideration of light rail provision, and the level of likely public passenger use along this overall corridor assessed in the transport modelling work, the development of the prior GDA Transport Strategy identified that a Metro solution would be economically justified within the area covered by this corridor. Therefore, it is intended to develop the light rail Metro system along this corridor through the implementation of MetroLink.

Arising from the various studies and analysis that had been carried out, and the specific assessment and transport modelling work undertaken for the prior GDA Transport

Strategy, 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. This is because 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.'

With respect to congestion charging, Section 3.2.8 of the EIAR states that a key success factor of demand management is greater use of alternative travel modes, in particular public transport. In the case of Dublin, the existing public transport system does not currently have sufficient capacity to cater for larger volumes of additional users.

'In advance of a significant uplift in overall public transport capacity in the Dublin metropolitan area, the implementation of major demand management measures across that area would be unsuccessful. Effectively constraining people from making journeys by car and requiring them to use other modes, without those modes having the necessary capacity to cater for such transfer, would not deliver an effective overall transport system. Instead, the capacity of the public transport system needs to be built up in advance of, or in conjunction with, the introduction of major demand management measures in the Dublin metropolitan area. This is especially true in the case of the bus system where a major increase in bus capacity through measures such as the Proposed Scheme would be required for the successful implementation of large scale demand management initiatives.

While the foregoing addresses the dependency of demand management measures on public transport capacity, it is equally correct that the provision of greatly enhanced cycling facilities will also be required to cater for the anticipated increase in cycling numbers, both in the absence of demand management measures and, even more so, with the implementation of such measures. Demand management initiatives by themselves will not deliver the level of segregated cycling infrastructure required to support the growth in that mode. Consequently, the progression of demand management proposals will not secure the enhanced safe cycling infrastructure envisaged under the Proposed Scheme.'

Finally it is noted that park and ride and cashless fares both form part of the broader BusConnects programme and may be implemented to complement improvements to the overall bus system, including the Proposed Scheme infrastructure.

ii) The Proposed Scheme has been designed to deliver upon the scheme objectives set out in Chapter 1 of the EIAR, which include enhancement of the potential for cycling by providing safe infrastructure for cycling. In some areas, land acquisition is required to deliver what has been determined to be the most appropriate design configuration that meets the scheme objectives. All areas included in the CPO have been carefully considered and only included where deemed absolutely necessary to meet the scheme objectives and to construct the scheme with permanent and temporary acquisitions respectively.

4. Why widen in the first place

At present, there is no bus lane on the Shantalla Road Bridge. As described in Section 4.5.3 of Chapter 4 Proposed Scheme Description of Volume 2 of the EIAR, '*A dedicated bus lane is proposed inbound along the Shantalla Road Bridge and a general traffic lane is maintained in both directions. The Shantalla Road junction will be upgraded to accommodate the bus lane and cycle and pedestrian movements'.*

The relevant extract from the General Arrangement drawings provided in EIAR Volume Part 1 of 3 proposed arrangement is shown in Figure 2.42.

Regarding the query as to why the tree canopy is being lifted to provide a cycle lane, it is acknowledged by the NTS that some experienced cyclists may choose to continue to cycle up the main road however the quiet street provides an option to make cycling more accessible to the less confident cyclist. The Proposed Scheme will provide a safe, sustainable transport corridor that can provide a sustainable alternative mode of transport for all ages and abilities.

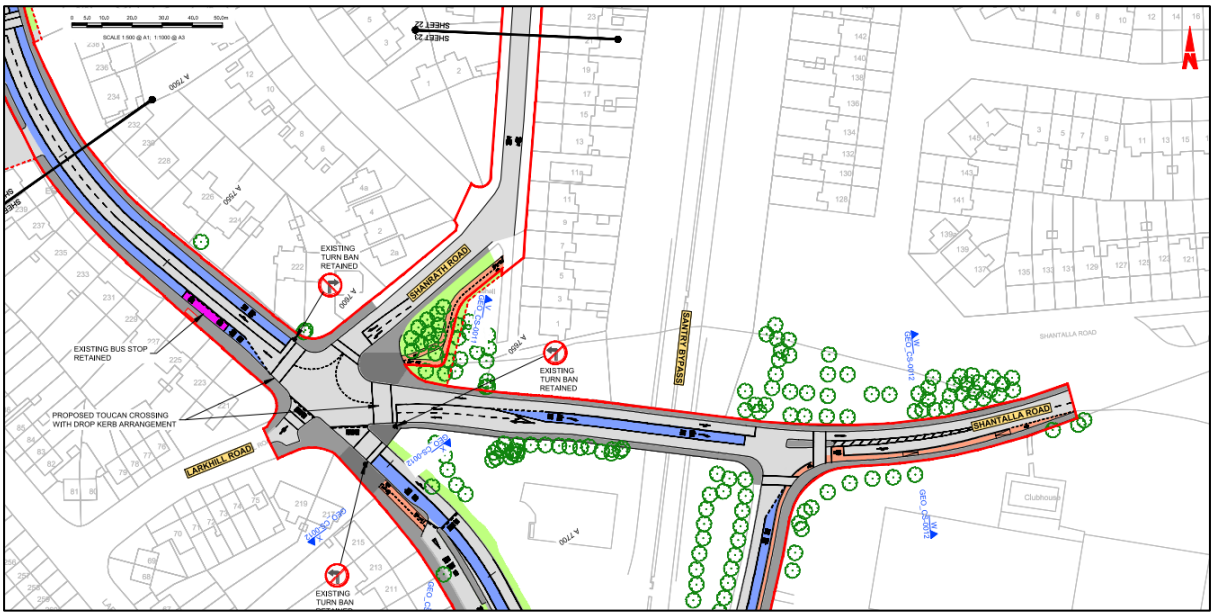

Figure 2.42 Extract of General Arrangement Drawing at Shantalla Road Bridge (Sheet 23)

2.10 Dispersed Locations

2.10.1 CPO-08 – Dubres Strategies Limited

2.10.1.1 Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor, it is proposed to provide a footpath, 1.5m wide cycle track, bus lane and general traffic lane in each direction.

The existing road cross section in this location provides a footpath on each side of the road with one general traffic lane and a shared bus and cycle lane in each direction.

In order to achieve the required cross section of the Proposed Scheme land acquisition is necessary from private properties along this section of Swords Road. As described in Section 4.5.5.1 of Chapter 4 of Volume 2 of the EIAR, the cross-section proposed has been designed so as to minimise the extent of necessary land acquisition.

The land take required is shown in the following:

- relevant extract of the EIAR Volume 3 Figures Chapter 4 Proposed Scheme Description Figures, General Arrangement drawings in Figure 2.43.
- and the existing aerial view in Figure 2.44.

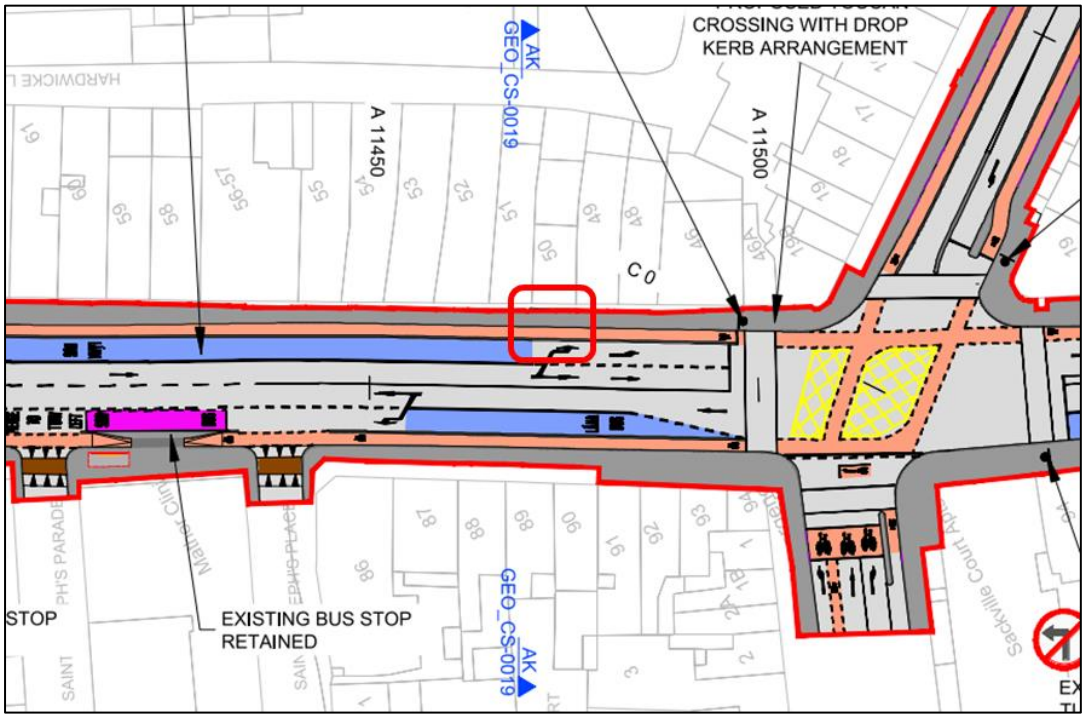

Figure 2.43 Proposed new Layout on Dorset Street

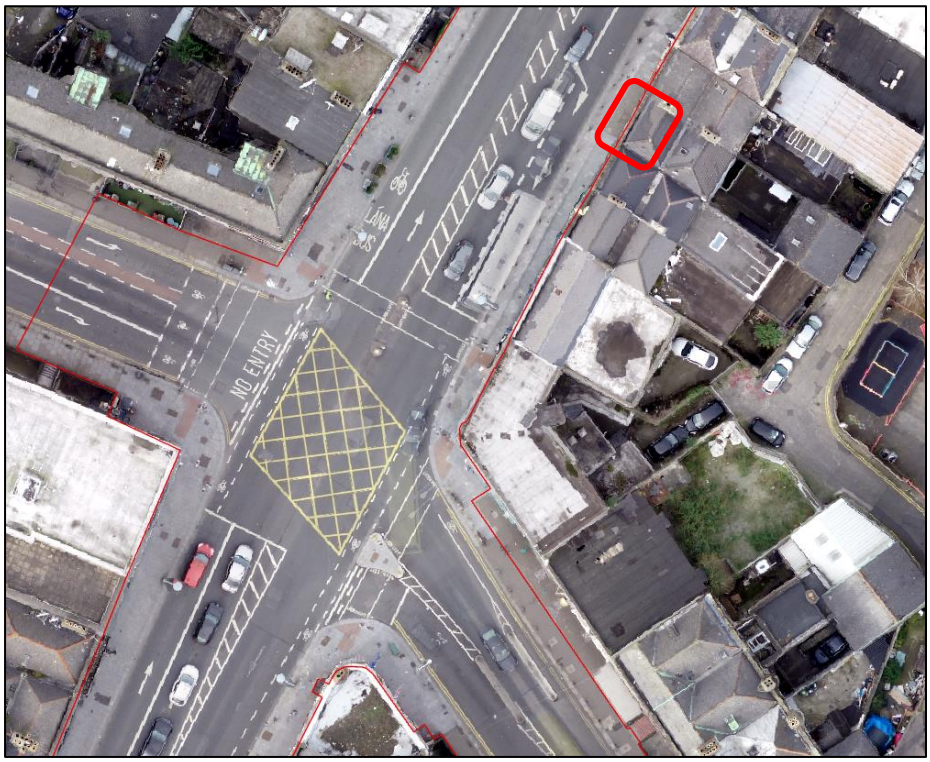

Figure 2.44 Existing aerial view on Dorset Street

2.10.1.2 Summary of Objections Raised

The objection to the CPO raises one potential issue:

The objection to the CPO raises concerns regarding the basement containing essential plant and equipment including the water intake valve, pump, sewer manhole and pipework and water take pertaining the entire building. For this reason, it is stated that Dubres Strategies Limited must retain ownership and absolute control over the subject property in order to access, maintain and carry out works.

2.10.1.3 Response to Objections Raised

The NTA notes the comments relating to the basement of 50 Dorset Street. Every reasonable effort was made to identify and make contact with the owner/occupier of this property prior to publishing the CPO.

The existing concrete slab at footpath level needs to be removed and replaced with a new footpath with surface finishes to match the surrounding footpath. This will be dependent on surveys prior to the construction works and any works will be agreed between the directly impacted landowners and the NTA during the accommodation works negotiations.

2.10.2 CPO-09 – Gas Networks Ireland

2.10.2.1 Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor, it is proposed to provide a footpath, cycle track, bus lane and two general traffic lane in each direction.

The existing road cross section in this location provides a shared use footpath/cycle track on each side of the road with two general traffic lanes and a bus lane in each direction.

In order to achieve the required cross section of the Proposed Scheme land acquisition is necessary from private properties along this section of Swords Road. As described in Section 4.5.2.1 of Chapter 4 of Volume 2 of the EIAR, the cross-section proposed has been designed so as to minimise the extent of necessary land acquisition.

The land take required is shown in the following:

- relevant extract of the EIAR Volume 3 Figures Chapter 4 Proposed Scheme Description Figures, General Arrangement drawings in Figure 2.45.
- and the existing aerial view in Figure 2.46.

Figure 2.45 Proposed New Layout at Collinstown Cross

Figure 2.46 Existing aerial view at Collinstown Cross

2.10.2.2 Summary of Objections Raised

The objection to the CPO raises two potential issues:

i) Utilities

The objection comments that GNI has gas infrastructure at this location, namely a high-pressure transmission pipeline, which provides gas supply to Dublin Airport and surrounding areas.

ii) Further information requested:

The objection listed a number of queries and requested response from the NTA:

1. Can the NTA please clarify this position in terms of GNI's existing way leave?
2. Can the NTA advise on how GNI's rights are going to be temporarily restricted or otherwise interfered with and how they intend to protect GNI's gas pipe?
3. GNI require clarification from the NTA if they will be extinguishing GNI's wayleave in relation to the area shaded orange and labelled CQ on map reference 0002-DM-0012?
4. GNI require clarification from NTA as to how its temporary restriction and interference with the area marked EO on map reference 0002-DM-0012 will affect GNI's pipe and wayleave?

2.10.2.3 Response to Objections Raised

i) Utilities

The NTA notes the comment made in relation to the high-pressure transmission pipeline at this location. The EIAR Volume 3 Figures Chapter 4 Proposed Scheme Description 12. GNI Asset Alterations, Sheet 12, identifies a high-pressure transmission pipeline located in the central reserve of the carriageway at this location. As per the drawings there are no proposed alterations to this pipeline. The NTA acknowledge the Code of Practice for works taking place near the pipeline identified in the objection and requirement for supervision for any works taking place near the pipeline. The NTA will liaise closely with GNI/Ervia in order to ensure that their requirements are met within the context of the Proposed Scheme.

ii) Further information requested:

Ervia were identified as having an easement over plot 1042(1).1c and 1042(2).2c, as the freehold folio DN33F for this plot lists an easement in favour of Ervia. The exact location of this easement within the plot is not specified on the folio. From the map provided by GNI in the objection, the high-pressure transmission pipeline appears to be located in the central reserve of the carriageway and not within plot 1042(1).1c and 1042(2).2c. The NTA will liaise with GNI to confirm if the easement is outside the plot area and, if confirmed, Ervia can be removed from the schedule.

The NTA confirms that GNI access to any gas infrastructure within plots 1042(1).1c and 1042(2).2c will be maintained throughout the duration of the construction phase and once the Proposed Scheme is operational. As noted above, the NTA will liaise closely with GNI in order to ensure that their requirements are met within the context of the Proposed Scheme.

2.10.3 CPO-10 – Huntwave Company Limited

2.10.3.1 Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor, it is proposed to provide a footpath, cycle track, bus lane and general traffic lane in each direction.

The existing road cross section in this location provides a footpath on each side of the road with one general traffic lane, a bus lane and advisory cycle lane in each direction.

In order to achieve the required cross section of the Proposed Scheme land acquisition is necessary from private properties along this section of Swords Road.

The land take required is shown in the following:

- relevant extract of the EIAR Volume 3 Figures Chapter 4 Proposed Scheme Description Figures, General Arrangement drawings in Figure 2.47.
- and the existing aerial view in Figure 2.48.

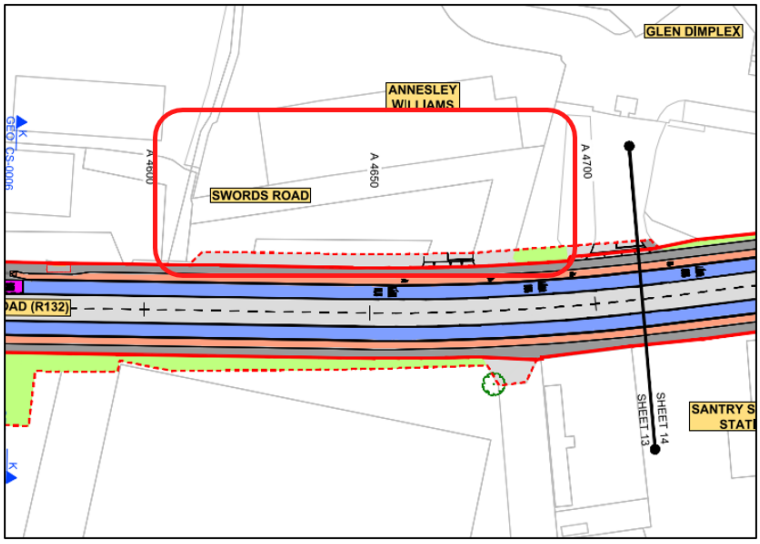

Figure 2.47 Proposed new Layout on the Swords Road (R132)

Figure 2.48 Existing aerial view on the Swords Road (R132)

2.10.3.2 Summary of Objections Raised

The objection to the CPO raises two potential issues:

i) Impact of Land Take on Business

The objection comments that any loss temporary or permanent will have a detrimental effect on the company's business and potential to trade.

ii) Impact of Bus Corridor on Business

The objection considers that the provision of a Bus Corridor at this location will have a severe long term negative impact on the company's business. The objection also mentions that major traffic and safety issues already exist at this location and the establishment of such a corridor will exacerbate these problems.

2.10.3.3 Response to Objections Raised

i) Impact of Land Take on Business

At Annesley Williams, an area of land is required to be permanently acquired to facilitate the cross section of the Proposed Scheme. The area of land to be permanently acquired is approximately 33m^2 (a maximum width of approximately 0.8m). In order to facilitate the proposed cross section at this location, minor adjustments to the existing footpath levels are necessary where it ties in with the access point to the property. Subsequently, an additional area of land is required to be temporarily acquired, 213m^2 in area (a general width of approximately 3m), to facilitate surface tie-in regrade works to the property and access point of the property.

The proposed works will modify the existing entry and exit points of the forecourt to the car sales business to facilitate the tie-in. As a result of the realigned footpath, which encroaches towards the forecourt area by a maximum of 0.8m, there is a minor impact to the existing forecourt area. The arrangement of how vehicles enter and exit the property is not affected by the Proposed Scheme in the Operational Phase and the operational capacity of the forecourt remains largely unchanged. Therefore, it is not envisaged that the Proposed Scheme will impact on business operations.

Section 5.5.2.1 of EIAR Chapter 5 Construction clarifies that '*Any lands acquired temporarily to facilitate construction work will be returned to landowners on completion of the works. Existing boundary walls or fencing being relocated will be constructed to match the existing conditions, unless otherwise agreed. The removal of trees, vegetation, lawns, paving etc. will be minimised in so far as practicable.*'

Chapter 10 (Population) in Volume 2 of the EIAR includes an assessment of the impact on commercial properties as a result of land take during both the Construction Phase (Section 10.4.3.2.2.1) and the Operational Phase (Section 10.4.4.2.2.1). The commercial properties which were assessed are listed in the Chapter's Appendix A10.1 (Schedule of Commercial Businesses) in Volume 4 Part 3 of the EIAR, of which the Annesley Williams Ltd is entry number 36. The facility was not assessed as being significantly impacted by either the construction or operation of the Proposed Scheme as summarised in the aforementioned sections. The impact of land take on commercial receptors across the Swords community area as a whole is considered Negative, Not Significant and Temporary/Short-Term during the Construction Phase. For the operational phase, the impact of land take on commercial receptors across the Swords community area as a whole is considered Negative, Not Significant and Long-Term.

Section 5.5.3.2 of EIAR Chapter 5 Construction sets out that '*When roads and streets are being upgraded, there will be some temporary disruption / alterations to on-street and off-street parking provision, and access to premises in certain locations along the Proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. Details regarding temporary access provisions will be discussed with residents and business owners prior to construction starting in the area. The duration of the works will vary from property to property, but access and egress will be maintained at all times.*'

iii) Impact of Bus Corridor on Business

The aim of the Proposed Scheme is to provide enhanced walking, cycling and bus infrastructure on this key access corridor in the Dublin region, which will enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor. The Proposed Scheme will greatly improve transport services for all that live along the route of the Proposed Scheme, including on Swords Road, by providing significantly improved sustainable transport options.

EIAR Chapter 10 'Population' includes Appendix A10.2 'Economic Impact of the Core Bus Corridors'. Section 3 on page 14 of the appendix assesses what the economic impact of the provision of bus corridor infrastructure on the communities along the route using evidence from international Case Studies for similar schemes. This economic impact include effects on property values The conclusion reached is that in overall terms '*the public realm improvements planned by the NTA may in fact lead to an increase in value of both residential and retail property prices, especially in the community centres along the corridors.'*

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

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage its agent/valuer in preparing, negotiating, and advising on compensation.

2.10.4 CPO-11 – daa

2.10.4.1 Description of the Proposed Scheme at this location

There are a number of plots associated with the daa, these are listed below in Table 2.9

Table 2.9 List of daa Plots

Plot Number	Plot Number
1023(1).1i, 1023(2).2i	1041(1).1d, 1041(2).1d
1024(1).1i, 1024(2).2i	1034(2).1c
1025(1).1c, 1025(2).2c, 1025(3).2c	1034(3).2i
1027(1).1b, 1027(2).2b	1034(4).2b
1028(01).1b, 1028(02).1b, 1028(03).2b, 1028(04).2b	1042(1).1c, 1042(2).2c
1028(05).1i, 1028(06).1i, 1028(07).2i	1043(1).1b, 1043(2).2b, 1043(3).2b
1028(08).1c, 1028(09).2c, 1028(10).2c	1049(1).1c, 1049(2).2c, 1049(3).2c
1028(11).1c, 1028(12).2c	1052(1).1a, 1052(2).1a, 1052(3).1c, 1052(4).1c, 1052(5).1i, 1052(6).1i, 1052(7).2a, 1052(8).2c, 1052(9).2i
1032(1).1c, 1032(2).2c	1053(1).1a, 1053(2).2a, 1053(3).2c
1033(1).1c, 1033(2).2c	1054(1).2c
1034(1).2c	1028(13).1i, 1028(14).2i
1037(1).1c	

2.10.4.2 Summary of the Submission

daa brings the Board's attention to Section 17(3), Air Navigation and Transport (amended) Act 1998 which removes the entitlement to compulsory acquire land at Dublin Airport owned by daa. daa have notified the applicant, the NTA and will now engage with the NTA outside the CPO process.

2.10.4.3 Response to the Submission

daa's support for the Proposed Scheme is noted and welcomed by the NTA. Indeed, in accordance with daa's letter, there has been very positive engagement between the NTA and daa in relation to the purchase of daa's interests in the relevant lands/interests for the purposes of the Proposed Scheme, and significant progress has been made between the parties in terms of reaching an agreement. The NTA is very confident that a binding agreement will be entered into in short order.

2.10.5 CPO-12 – JJ Breen

2.10.5.1 Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor, it is proposed to provide a footpath, cycle track, bus lane and general traffic lane in each direction.

The existing road cross section in this location provides a footpath on each side of the road with one general traffic lane heading inbound and two traffic lanes heading outbound, and a bus lane in each direction.

In order to achieve the required cross section of the Proposed Scheme land acquisition is necessary from private properties along this section of Swords Road. As described in Section 4.5.5.1 of Chapter 4 of Volume 2 of the EIAR, the cross-section proposed has been designed so as to minimise the extent of necessary land acquisition.

The land take required is shown in the following:

- relevant extract of the EIAR Volume 3 Figures Chapter 4 Proposed Scheme Description Figures, General Arrangement drawings in Figure 2.49.
- and the existing aerial view Figure 2.50.

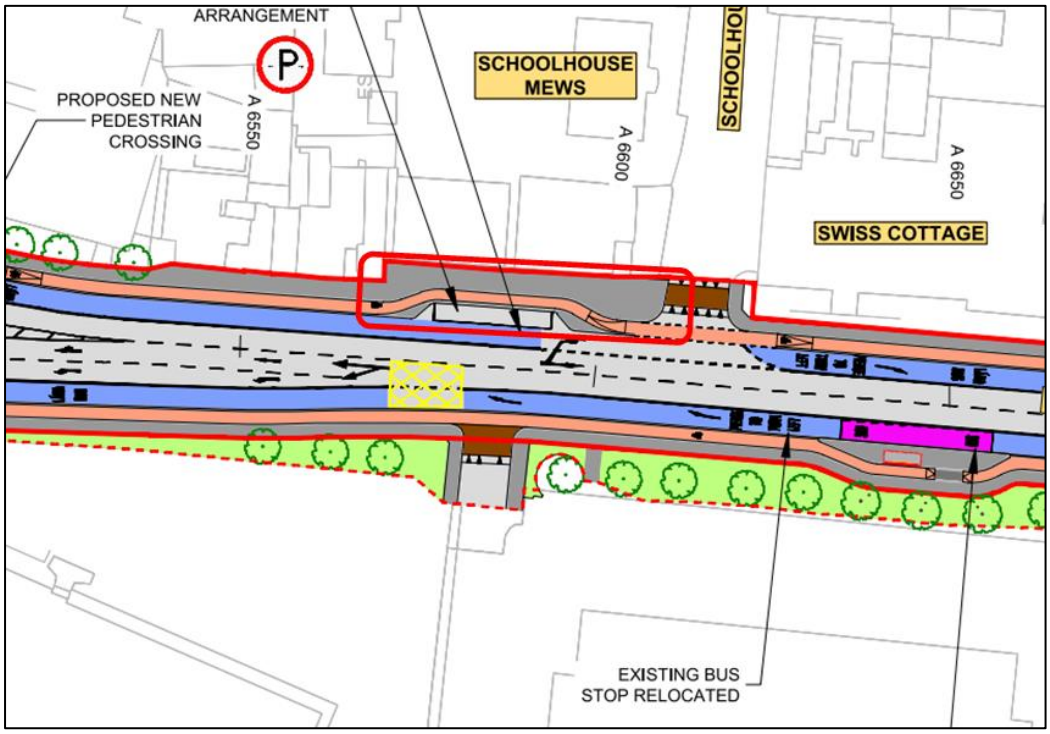

Figure 2.49 Proposed new Layout on the Swords Road (R132)

Figure 2.50 Existing aerial view on the Swords Road (R132)

2.10.5.2 Summary of Objections Raised

The objection to the CPO raises three potential issues:

i) Construction Impacts

The objection is concerned with the Old Swiss Cottage which is noted as the last of the original Swiss Cottages. The objection states that the building is over 200 years old, the foundations are of unknown quality, and considers that any proposed work will very possibly cause structural damage to this historical building.

ii) Impact to Business (Operation)

The objection considers that the proposed works will cause major disruption to business, works are excessive in nature and duration is too long.

iii) Impact to Business (Parking)

The objection expresses concerns over the proposal to CPO all of the lands in front of Magner's Pharmacy and Eurohouse, taking car parking and loading spaces that have been used by the pharmacy for the past 20 years, without which the owner will struggle to survive.

2.10.5.3 Response to Objections Raised

i) Construction Impacts

Chapter 16 (Architectural Heritage) of Volume 2 of the EIAR assesses the impact of the Proposed Scheme on structures of Architectural Heritage interest as a result of both construction and operation within a 50m study area around the Proposed Scheme.

The Old Swiss Cottage (Magner's Pharmacy) has no official heritage designation, however it has been identified within the assessment in Chapter 16 under the heading of '*Other Structures of Built Heritage Interest*' and given the Reference Number CBC0002BTH016. Table 16.11 in Chapter 16 describes Magner's Pharmacy as 'Cottages, c. 1800' and gives it a Local Significance and Low Sensitivity. The cottage is marked as a heritage feature in Figure 16.1 (Sheet 10) in Volume 3 of the EIAR, and is included in Appendix A16.2 (Inventory of Architectural Heritage Sites) in Volume 4 Part 3 of the EIAR (in Section 16.6).

Section 16.4.3.6 of Chapter 16 provides detail on the impact assessment on '*Other Structures of Built Heritage Interest*' during the Construction Phase, with the Magner's Pharmacy building included within the group of 53 structures to have '*Indirect, Negative, Slight, Temporary*' impacts as a result of the construction of the Proposed Scheme.

Appendix A16.3 (Methodology for Works Affecting Sensitive and Historic Fabric) in Volume 4 Part 3 of the EIAR outlines the requirements when working near or on historic fabric. Section 16.3 of Appendix A16.2 specifically describes the requirements for protection of architectural heritage buildings and structures during works.

ii) Impact to Business (Operation)

EIAR Chapter 5 Construction, Section 5.3.3.1 states that Section 3a of the route, which the objection refers to will last approximately 18 months. However, construction activities at individual plots will have shorter durations than outlined in overview of construction works presented Section 5.3. EIAR Appendix A5.1 CEMP, Section 5.2.1.2 lists the objectives of the Construction Traffic Management Plan, of which includes:

'Ensure disruption is minimised, with access to houses and businesses maintained, as is reasonably practicable in delivering the Proposed Scheme'.

Chapter 10 (Population) in Volume 2 of the EIAR includes an assessment of the impact on commercial properties as a result of land take during both the Construction Phase (Section 10.4.3.2.2.1) and the Operational Phase (Section 10.4.4.2.2.1). The commercial properties which were assessed are listed in the Chapter's Appendix A10.1 (Schedule of Commercial Businesses) in Volume 4 Part 3 of the EIAR, of which Magner's Pharmacy in Old Swiss Cottage Building is entry number 59. The facility was not assessed as being significantly impacted by either the construction or operation of the Proposed Scheme as summarised in the aforementioned sections.

iii) Impact to Business (Parking)

iv) The Proposed Scheme has been designed to deliver upon the scheme objectives set out in Chapter 1 of the EIAR, which include enhancement of the potential for cycling by providing safe infrastructure for cycling. In some areas, land acquisition is required to deliver what has been determined to be the most appropriate design configuration that meets the scheme objectives. All areas included in the CPO have been carefully considered and only included where deemed absolutely necessary to meet the scheme objectives and to construct the scheme with permanent and temporary acquisitions respectively. Appendix G (Parking Survey Report) of the Preliminary Design Report notes that retaining the existing layout would result in reduced quality of service for buses, cyclists, and motorised vehicle traffic which would undermine the overall scheme objectives.

Section 6.4.6.1.4.4 of EIAR Volume 2 Chapter 6 Traffic and Transport sets out an assessment of car parking loss in the scheme section between Northwood Avenue to Shantalla Road. Specifically at this location it is stated:

'There are currently six informal parking spaces available in front of commercial sites at Schoolhouse Mews and two spaces at Magner's Pharmacy. It is proposed to remove five parking spaces, to facilitate the implementation of a cycle track and bus lane, which will provide enhanced

bus and cyclist facilities. The loss of these spaces may be mitigated by relocating the existing parking to the side street at Santry Villas / Church Lane, to integrate with the existing parking facilities at this location. However, there may not be a like-for-like replacement due to space constraints. The impact of this loss is deemed to be Negative, Moderate and Long Term;'

2.10.6 CPO-15 – Juliana Boland & Others

2.10.6.1 Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor, it is proposed to provide a footpath, cycle track, bus lane and general traffic lane in each direction.

The existing road cross section in this location provides a footpath with one general traffic lane, and a bus lane in each direction, along with an advisory cycle lane in the outbound direction.

In order to achieve the required cross section of the Proposed Scheme land acquisition is necessary from private properties along this section of Swords Road.

The land take required is shown in the following:

- relevant extracts of the EIAR Volume 3 Figures Chapter 4 Proposed Scheme Description Figures, General Arrangement drawings in Figure 2.51 and Figure 2.52.
- and the existing aerial views in Figure 2.53 and Figure 2.54.

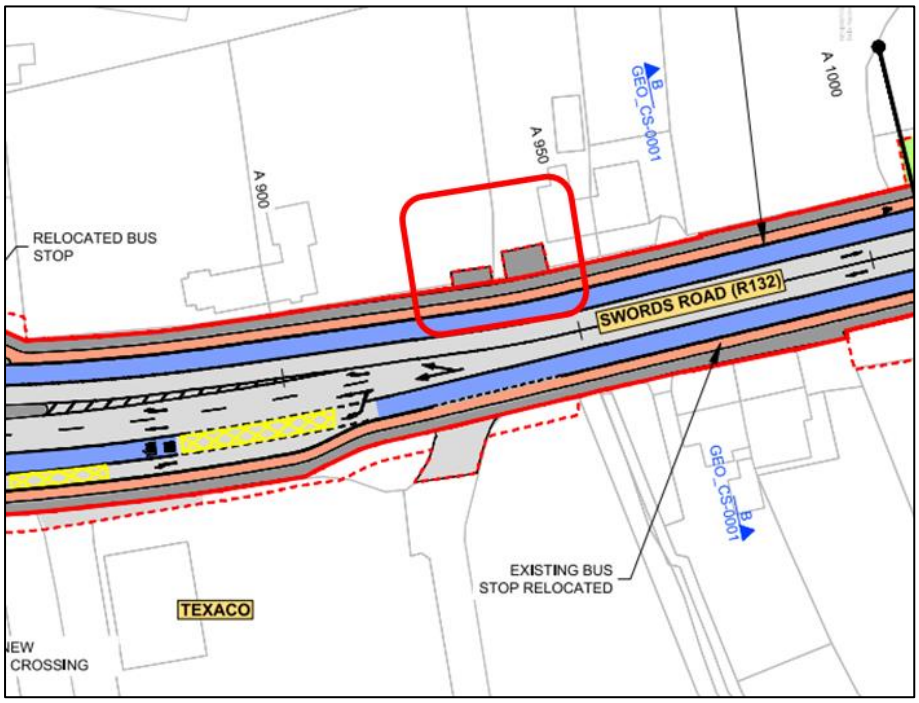

Figure 2.51 Proposed new Layout on the Swords Road (R132)

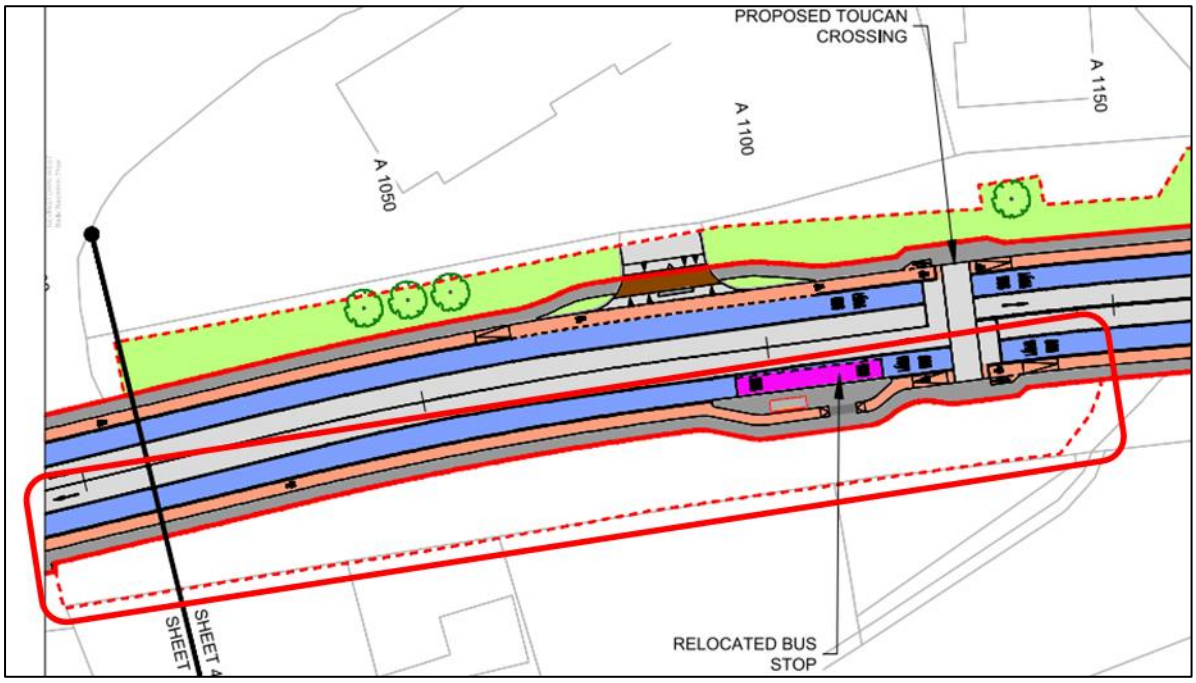

Figure 2.52 Proposed new Layout on the Swords Road (R132)

Figure 2.53 Existing aerial view on the Swords Road (R132)

Figure 2.54 Existing aerial view on the Swords Road (R132)

2.10.6.2 Summary of Objections Raised

The objection to the CPO raises five potential issues:

i) Access to Business

The objection expresses concern regarding access to properties via existing driveways/gateways during works and on completion of works.

The objection expresses concern regarding continuous, permanent access, right of way to enter and exit their properties north and south bound.

The objection expresses concern regarding continuous, permanent access, right of way to park vehicles with particular reference to but not exclusive to plot reference 1011(1).1c, 1011(2).2c, 1007(1).2d, 1008(1).2d.

The objection expresses concern regarding continuous, permanent access, right of way to park outside their properties outside of the current bus line times of 7 to 7, 6 days a week.

ii) Accommodation Works/Boundary Treatment

The objection questioned if the NTA will take full responsibility financially and physically to have the properties fully restored or upgraded to their requirements.

The objection notes concerns regarding uninvited guests at their property and the provision of gates along the boundary.

iii) Construction Impacts

The objection raises concerns regarding the potential for works being undertaken on a 24/7 basis.

iv) Location of Proposed Bus Stop

The objection expresses concerns regarding bus stops being located directly outside their properties and that increased noise levels from people waiting at potential bus stops would greatly impact their lives.

v) Utilities and Drainage

The objection raised concern regarding to disruption to utilities.

The objection also considers that there have been issues with storm drains collapsing. The objection raises concerns regarding replacement storm drains being capable of carrying the extra weight of increased usage by extra buses of a heavier weight.

2.10.6.3 Response to Objections Raised

i) Access to Business

Regarding construction impact, 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 Section 5.5.3.1 of Chapter 5 of Volume 2 of the EIAR, details regarding temporary access provisions will be discussed with residents and business owners prior to construction starting in the area. The duration of the works will vary from property to property, but access and egress will be maintained at all times.

Vehicular access to the premises will not be blocked or restricted as a result of the construction of the Proposed Scheme. During the operational stage, there will be no restrictions to the access as indicated on General Arrangement Drawings in the EIAR, Volume 3, Figures, Chapter 4 Proposed Scheme Description, 03. General Arrangement is shown in Figure 2.55 and Figure 2.56 below.

Regarding the query about the right to park outside their properties outside of the current bus line times of 7 to 7, 6 days a week, bus lanes on the Proposed Scheme will operate 24 hours a day, 7 days a week.

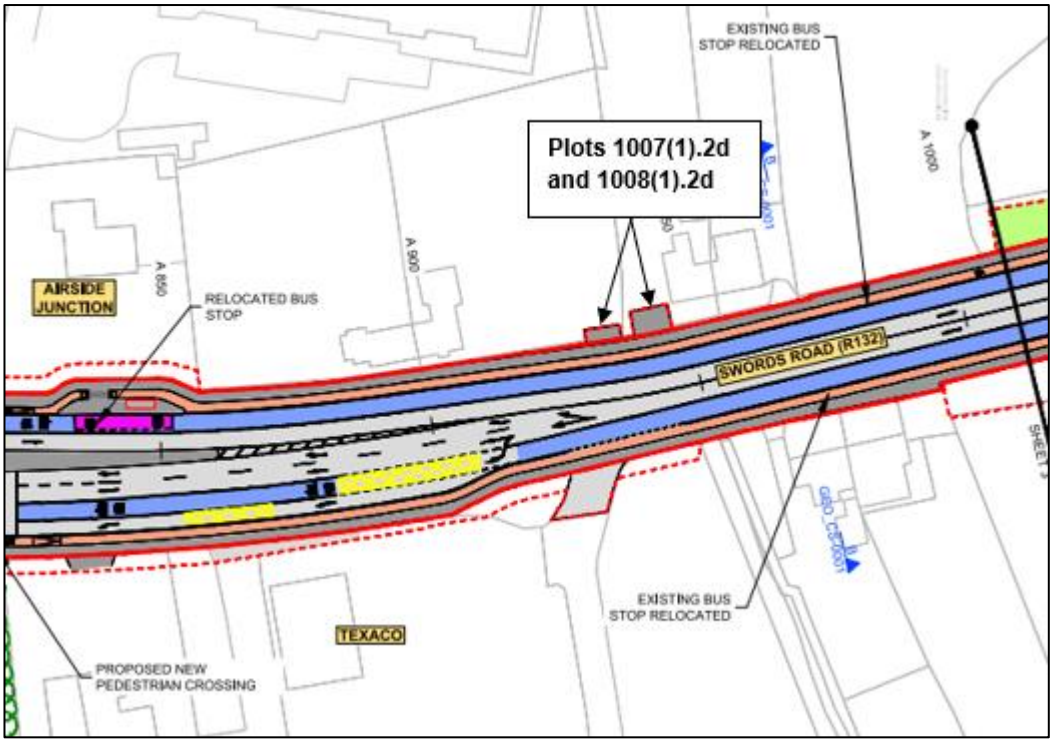

Figure 2.55 General Arrangement of Proposed Scheme at Plots 1007(1).2d and 1008(1).2d (Sheet 03)

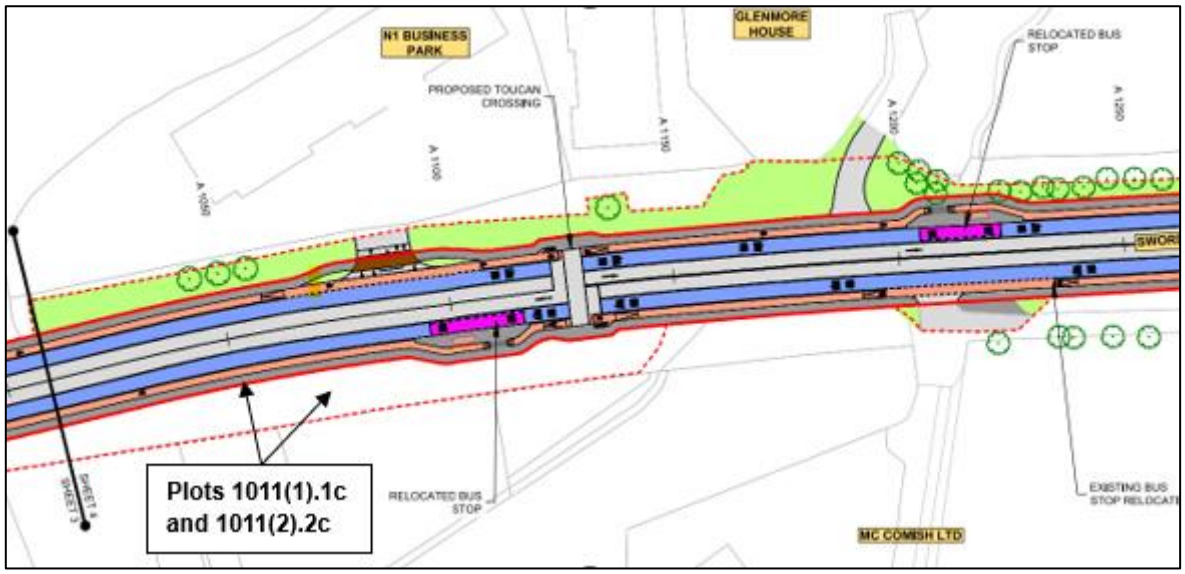

Figure 2.56 General Arrangement of Proposed Scheme at Plots 1011(1).1c and 1011(2).2c (Sheet 04)

ii) Accommodation Works/Boundary Treatment

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage your its agent / valuer in preparing, negotiating and advising on compensation.

As noted in Chapter 4 Proposed Scheme Description of the EIAR, reinstatement of property frontage including boundary walls, gates, railings driveway, footpath and landscaping will be on a like-for-like basis, and detailed accommodation works plans will be prepared in consultation with landowners in line with any formal agreements and in accordance with any embedded mitigations identified in the EIAR or conditions/modifications from An Bord Pleanála in relation to the Proposed Scheme application. The reinstatement of the boundary treatment will ensure a physical boundary is provided between the Proposed Scheme and the property, on a 'like for like' basis.

iii) Construction Impacts

With regard to construction impacts, where reasonably practicable to do so works will be carried out during normal working hours and in consultation with local residents.

Section 9.5.1.1.4 of Chapter 9 of Volume 2 of the EIAR sets out the proposed working hours and states: *'It is envisaged that generally construction working hours will be between 07:00hrs and 23:00hrs on weekdays, and between 08:00hrs and 16.30hrs on Saturdays. Night-time and Sunday working will be required during certain periods to facilitate street works that cannot be undertaken under daytime / evening time conditions.'*

However, the contractor will also have to take account of sensitive receptors (in particular any nearby residential areas). Section 9.5.1.1.4 goes on to state: '*The planning of such works will take consideration of sensitive receptors, in particular any nearby residential areas. Construction activities will be scheduled in a manner that reflects the location of the site and the nature of neighbouring properties. Construction activities / plant items will be considered with respect to their potential to exceed construction noise thresholds at NSLs and will be scheduled according to their noise level, proximity to sensitive locations and possible options for noise control. In situations where an activity with potential for exceedance of construction noise thresholds is scheduled (e.g. road widening and utility diversions or activities with similar noise levels identified in Table 9.42), other construction activities will be scheduled to not result in significant cumulative noise levels'.*

As set out in Appendix A5.1 Construction Environmental Management Plan (CEMP) of Volume 4 Appendices Part 1 of 2 of the EIAR, there are a number of specific noise mitigation and monitoring measures that will be implemented including the following:

NV2: The appointed contractor will put in place the most appropriate noise control measures depending on the level of noise reduction required at individual working areas i.e., based on the construction threshold values for noise and vibration set out in Tables 9.7 and 9.10 in Chapter 9 (Noise & Vibration) of this EIAR. Reference to Table 9.37 in Chapter 9 (Noise & Vibration) of this EIAR indicates that intrusive works occurring within 25m to 45m of Noise Sensitive Locations (NSLs) will need specific noise control measures to reduce impacts depending on the time period over which they will occur, i.e., daytime or evening.

NV8: Construction activities will be scheduled in a manner that reflects the location of the site and the nature of neighbouring properties. Construction activities / plant or equipment items will be considered with respect to their potential to exceed construction noise thresholds at NSLs and will be scheduled according to their noise level, proximity to sensitive locations and possible options for noise control. In situations where an activity with potential for exceedance of construction noise thresholds is scheduled (e.g., road widening and utility diversions or activities with similar noise levels identified in Table 9.22 in Chapter 9 (Noise & Vibration) of this EIAR). Other construction activities associated with the Proposed Scheme will be scheduled to avoid significant cumulative noise levels

NV9: The NTA will establish clear forms of communication that will involve the appointed contractor and NSLs in proximity to the works so that residents or building occupants are aware of the likely duration of activities likely to generate noise or vibration that are potentially significant as set out in Table 9.7 and Table 9.10 in Chapter 9 of this EIAR.

NV10: During the Construction Phase the appointed contractor will carry out noise monitoring at representative NSLs to evaluate and inform the requirement and / or implementation of noise management measures. Noise monitoring will be conducted in accordance with International Organization for Standardization (ISO) 1996–1 (ISO 2016) and ISO 1996–2 (ISO 2017). The selection of monitoring locations will be based on the nearest representative NSLs to the working area which will progress along the length of the Proposed Scheme.

iv) Location of Proposed Bus Stop

As part of the development of the design of the Proposed Scheme a bus stop review was undertaken and is presented in the Preliminary Design Report Appendix H (Bus Stop Review Report), included in the Supplementary Information. The purpose of the process was to review the locations of the existing Dublin Bus stops and to determine whether a stop should be removed, relocated, or remain where it is. This exercise was carried out to optimise the performance of the bus services on the Proposed Scheme by reducing the journey time of the bus service, increasing the walking catchment of the bus stops and ensuring that key trip attractors located along the route are sufficiently covered within the catchment of bus stops.

The proposed bus stop locations on the Proposed Scheme are indicated on the General Arrangement Drawings in the EIAR, Volume 3, Figures, Chapter 4 Proposed Scheme Description, 03. General Arrangement. Sheet 03 of 37 indicates the Proposed Scheme at Plots 1007(1).2d and 1008(1).2d, see Figure 2.55. There are no bus stops proposed in the vicinity of these plots.

Sheet 04 of 37 indicates the Proposed Scheme at Plots 1011(1).1c and 1011(2).2c, see Figure 2.56. Existing bus stop 3675, which was located outside a property which the NTA understand to be under the objector's ownership, will be relocated away from the property approximately 250m to the north of Airside Junction. As part of this exercise, it is also proposed to relocate bus stop 3674 approximately 130m north to be closer to the proposed mid-block crossing near the N1 Business Park. As noted in Appendix A of the Preliminary Design Report Appendix H (Bus Stop Review), included in the Supplementary Information, the bus stop at the existing location is seldom used and there are no trip attractors nearby, the proposed location is closer to attractors such as N1 Business Park and Glenmore House B&B, and the crossing provides easier access to Kilronan Equestrian Centre. This location is the optimal location for a bus stop in this area which best meets the objectives of the scheme. While this bus stop is being located closer to the residential property it still remains approximately 130m away.

It can therefore be concluded that no bus stops are proposed to be located directly outside the objector's residential properties.

Figure 2.57 Existing Bus Stop 3675, to be relocated away from this property (Image Source: Google)

v) Utilities and Storm Drains

With regards to utilities, as set out in Section 19.5.1.1 of Chapter 5 of Volume 2, all possible precautions will be taken by the appointed contractor to avoid unplanned interruptions to any services during the Construction Phase of the Proposed Scheme. This will include appropriate investigation by the appointed contractor to identify the precise location of all utility infrastructure within the working areas prior to the commencement of excavation works. Where works are required in and around known utility infrastructure, precautions will be implemented by the appointed contractor to protect the infrastructure from damage, in accordance with best practice methodologies and the requirements of the utility companies, where practicable. Protection measures during construction will include warning signs and markings indicating the location of utility infrastructure, safe digging techniques in the vicinity of known utilities, and in certain circumstances where possible, isolation of the section of infrastructure during works in the immediate vicinity.

With regards to the drainage design, as set out in Section 13.4.1.1 of EIAR Volume 2 Chapter 13 Water:

'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). 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 Proposed Scheme primarily involves the reallocation of existing road space. Where additional impermeable areas are proposed, a SuDS strategy has been developed to ensure that there will be no increase in existing runoff rates. This is the appropriate surface water management strategy for the Proposed Scheme.

At this location a proposed storm water pipe is to be located in the verge of the inbound carriageway due to the increase in impermeable area as indicated on Proposed Surface Water Drainage Works Drawings in the EIAR, Volume 3, Figures, Chapter 4 Proposed Scheme Description, 11. Proposed Surface Water Drainage Works.

The NTA notes the comments raised in relation to the condition of the existing storm drains. Pre-construction surveys will be undertaken in line with Section 5.5.2.1. of EIAR Chapter 5 Construction.

2.10.7 CPO-17 – Kealy's of Cloghran

2.10.7.1 Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor, it is proposed to provide a footpath, a bus lane and two general traffic lanes in each direction, along with a two-way cycle track on the outbound side.

The existing road cross section in this location provides a shared cycle track and footpath with two general traffic lanes, and a bus lane in each direction, however inbound cyclists cannot cross the existing airport roundabout. Under the Proposed Scheme, inbound cyclists will cross to the outbound side of the R132 at a proposed Toucan crossing at the Coachmans Inn, and will continue on the outbound side past Kealy's pub as far as the South Corballis Road junction, thereby necessitating land acquisition in front of the pub premises.

In order to achieve the required cross section of the Proposed Scheme land acquisition is necessary from private properties along this section of Swords Road.

The land take required is shown in the following:

- relevant extract of the EIAR Volume 3 Figures Chapter 4 Proposed Scheme Description Figures, General Arrangement drawings in Figure 2.58
- and the existing aerial view in Figure 2.59.

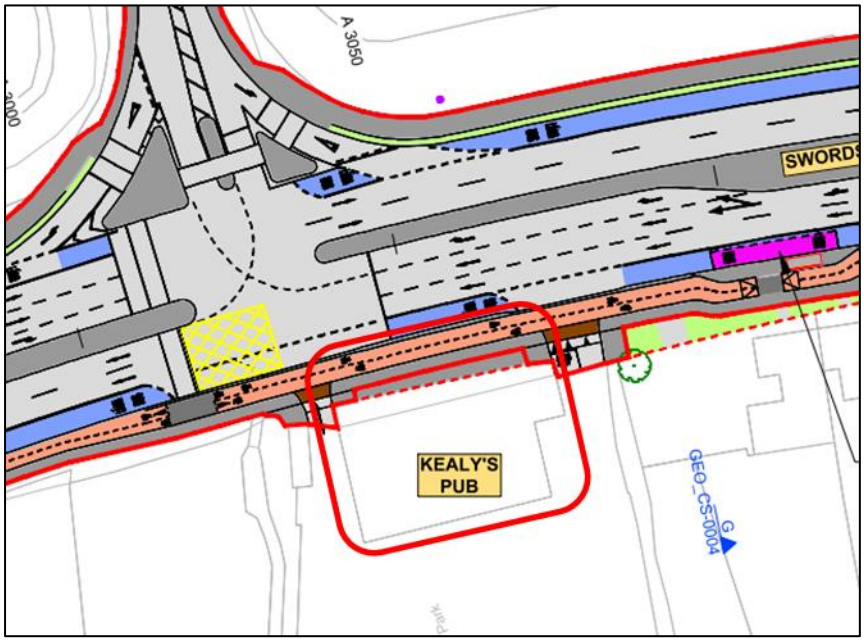

Figure 2.58 Proposed new Layout on the Swords Road (R132)

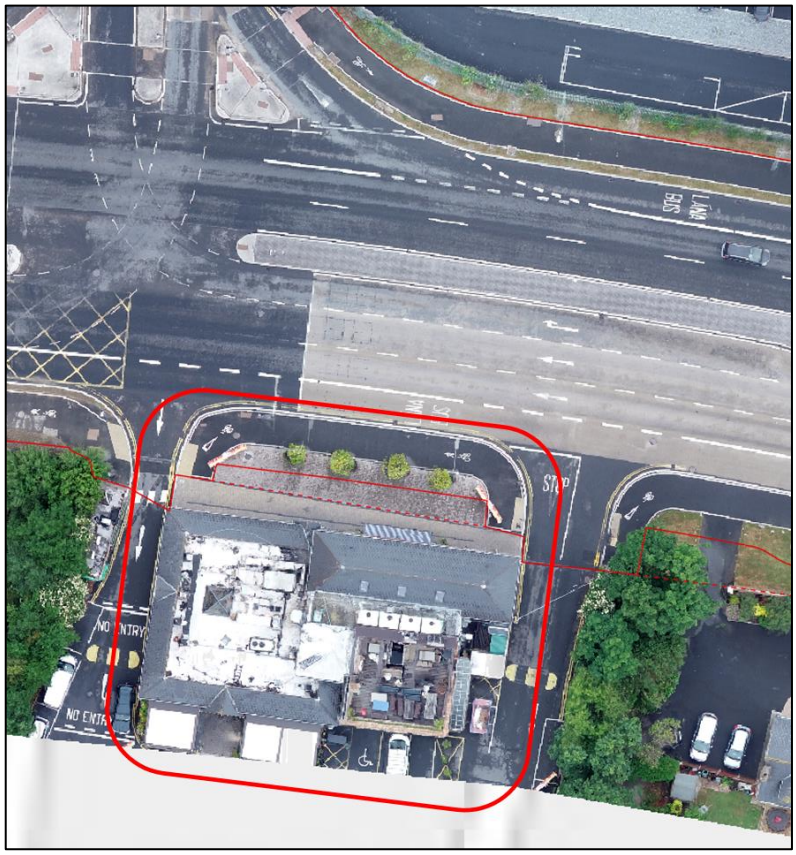

Figure 2.59 Existing aerial view on the Swords Road (R132)

2.10.7.2 Summary of Objections Raised

The objection to the CPO raises seven potential issues:

i) Creation of a Long-Term Traffic Hazard

The objection considers that the proposed works will result in the creation of a long-term traffic hazard due to the proximity of traffic lanes to the front of the property and the omission of the existing strip of planter boxes as is suggested in the General Arrangement drawing.

ii) Removal of Staff/Coach Parking Area

The objection considers that the proposed works will render the existing parking area to the front of the site unusable, and requests that an appropriate extent of parking space adjoining the footpath to the immediate front of the property is retained to ensure this parking area is not compromised.

iii) Carpark Accessibility

The objection is concerned that the scheme will result in traffic queuing on the Swords Road as it waits for cyclists to cross the access road into the rear carpark.

iv) Commercial Impact during Construction Process

The objection notes a lack of clarity in relation to the length of the construction process and impact on access.

It is noted within this objection that increased noise levels are considered to represent a direct impact arising as a result of the scheme. They are unclear whether internal and external noise levels at the property will remain compliant with the relevant standards set out in BS 8233:2014.

v) Development Plan Policy

It is noted within the objection that the site is zoned High Technology under the provisions of the Fingal Development Plan 2023-2029. The objection noted that this zoning provides the following

objective which must be considered: 'Provide for residential development and protect and improve residential amenity'.

vi) Devaluation of Property

There is a concern that proposed works and associated accessibility and noise impacts will lead to a loss in value of numerous properties in the immediate area.

vii) Mitigation and Compensation

The objection states that it is considered reasonable that the NTA engage directly with their client in relation to identifying appropriate mitigation measures to ensure the adequate protection of residential amenity at this location. In the absence of comprehensive mitigation measures they would seek compensation to offset potential impacts.

There is a concern that proposed works and associated accessibility and noise impacts will lead to a loss in value of numerous properties in the immediate area.

2.10.7.3 Response to Objections Raised

i) Creation of a Long-Term Traffic Hazard

The NTA notes the comments raised in the objection. The Proposed Scheme provides additional safety measures such as continuous kerb segregated cycle tracks. Notwithstanding, the NTA recognises the benefits green buffers can bring and have introduced these elements at various sections in the Proposed Scheme where reasonably practicable to do so. There may be scope to relocate the existing planters during accommodation works negotiations, however careful consideration needs to be given when introducing grassed or planted buffers such that a consistent and legible layout can be understood by all road users.

It is noted that the Road Safety Audit undertaken for the Proposed Scheme, included as Appendix M of the Preliminary Design Report provided in the Supplementary Information, did not highlight any safety issues with the proposed arrangement at this location.

ii) Removal of Staff/Coach Parking Area

This parking space has not been identified as a formal parking space in the Parking and Loading assessment described in Section 6.4.6.1.3.4 of Chapter 6 Traffic and Transport of Volume 2 of the EIAR, due to the absence of appropriate signage and demarcation.

As there are significant parking facilities to the rear of Kealy's pub it is anticipated that any coaches or staff parking could be accommodated in these spaces. The exact details of any reconfiguration required during construction and in the permanent situation will be discussed with the landowner prior to the commencement of any works.

iii) Carpark Accessibility

The access to the car park of Kealy's pub is indicated on General Arrangement Drawings in the EIAR, Volume 3, Figures, Chapter 4 Proposed Scheme Description, 03. General Arrangement is shown in Figure 2.60.

The Design Manual for Urban Roads and Street (DMURS) advises that 'the design of vehicle crossovers clearly indicate that pedestrians and cyclists have priority over vehicles'. The design for each junction within the Proposed Scheme was developed to meet the underlying objectives of the project and to align with the geometric parameters set out in Section 4.1 of the Preliminary Design Report, included in the Supplementary Information, and in conjunction with the junction operation principles described in as BusConnects Preliminary Design Guidance Booklet (PDGB), which is Appendix A4.1 of the EIAR.

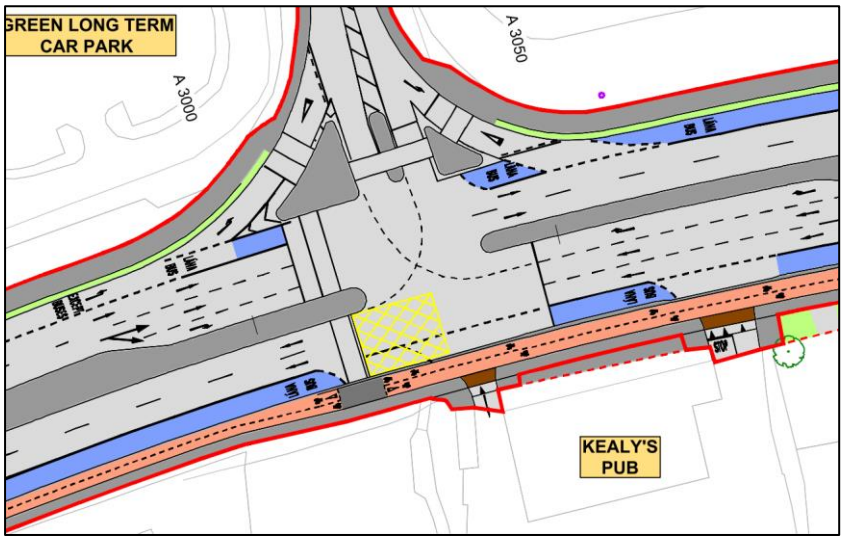

Figure 2.60 General Arrangement of Proposed Scheme at Kealy's Pub (Sheet 09)

The Road Safety Audit undertaken for the Proposed Scheme, included as Appendix M of the Preliminary Design Report provided in the Supplementary Information, did not highlight any safety issues with the proposed access and parking arrangement in this regard.

iv) Commercial Impact during Construction Process

With regards to construction duration, Section 5.3.2.2 of Chapter 5 of Volume 2 of the EIAR provides details of the construction activities along Swords Road, between Airside Junction and (Dublin) Airport Roundabout.

The expected construction duration for the section will be approximately 18 months. However, construction activities at individual plots will have shorter durations than outlined in overview of construction works presented Section 5.3. The programme identifies the approximate duration of works at each section.

Regarding access and construction impact, 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 Section 5.5.3.1 of Chapter 5 of Volume 2 of the EIAR, '*details regarding temporary access provisions will be discussed with residents and business owners prior to construction starting in the area. The duration of the works will vary from property to property, but access and egress will be maintained at all times'*.

Vehicular access to the premises will not be blocked or restricted as a result of the construction of the Proposed Scheme. During the operational stage, there will be no restrictions to the access as indicated on General Arrangement Drawings in the EIAR, Volume 3, Figures, Chapter 4 Proposed Scheme Description, 03. General Arrangement is shown in Figure 2.60 above .

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage your its agent / valuer in preparing, negotiating and advising on compensation.

Regarding the noise impact of the Proposed Scheme, Section 9.4.4.1 of EIAR Volume 2 Chapter 9 Noise and Vibration provides details of the assessment undertaken for the Operational Phase of the Proposed Scheme in respect of the potential noise and vibration impacts associated with altered traffic flows, realigned traffic lanes and displaced traffic flows.

Section 9.4.4.1.1.5 states that '*Along the majority of roads of the Proposed Scheme within the 1km study area, impacts as a result of traffic redistribution are determined to be Indirect, Positive, Imperceptible to Slight to Moderate, and Short to Medium Term to Negative, Moderate, and Short to Medium term once the Proposed Scheme becomes operational*.' It goes on to state that '*There*

are a small number of roads in the overall study area where there are potential initial significant impacts. These are defined as roads with a traffic noise level above a daytime noise level of 55 dB LAeq,16hr an increase in noise level greater than 3 dB.' Table 9.45 lists these roads and Swords Road is not included in Table 9.45.

Section 9.5.2.1 summarises the change in road traffic noise in the operation phase as follows: *'The impact assessment has determined that there are no calculated significant direct or indirect traffic noise impacts across the study area for the Proposed Scheme. The range of noise level changes and overall noise levels calculated do not require any specific noise mitigation measures to be incorporated into the Proposed Scheme.'*

In respect of electric buses, as discussed in Section 9.4.4.1.1.4 of Chapter 9, during the proposed Opening Year (2028), the NTA forecast is for 94% of the city bus fleet to be EVs or HEVs. For the Design Year (2043), the city bus fleet is forecast to be 100% electric. The operation of electric and hybrid buses will eliminate ICE noise from buses accelerating, decelerating and idling at bus stops which is the dominant noise source.

In addition, the characteristic of noise from EVs is subjectively less intrusive compared to those with ICE's and is masked to a much greater extent by surrounding road traffic. It is noted the bus stops along the Proposed Scheme will be used by other bus operators which may not transition to EV and HEVs over the same period as the city bus fleet. The volume of these buses along the Proposed Scheme will, however, be significantly less than the city bus fleet and hence, noise levels associated with these areas will not generate significant noise levels over the prevailing noise environment.

With respect to construction noise impacts, as noted in Figure 9.3 in Volume 3 of the EIAR, a Not Significant-Slight noise impact is forecast along Swords Road at Kealy's Pub.

The EIAR contains a comprehensive set of mitigation measures to minimise construction phase impacts, including noise impacts. Construction noise mitigation measures are set out in Chapter 9 in Volume 2 of the EIAR (and are also summarised in Appendix 5.1 (Construction Environmental Management Plan) in Volume 4 of the EIAR).

Section 9.5.1.1 of EIAR Volume 2 Chapter 9 states that: *'The appointed contractor will be required to take specific noise abatement measures to the extent required and comply with the recommendations of BS 5228–1 (BSI 2014a) and S.I. No. 241/2006 - European Communities (Noise Emissions by Equipment for Use Outdoors) (Amendment) Regulations 2006.'* It also states that '*During the Construction Phase, the appointed contractor will be required to manage the works to comply with the limits detailed in Section 9.2.4.1 using methods outlined in BS 5228–1 (BSI 2014a)*'

Section 9.5.1.1 also states that *'BS 5228–1 includes guidance on several aspects of construction site practices, which include, but are not limited to:*

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

Specifically, Section 9.5.1.1. states that *'The appointed contractor will put in place the most appropriate noise control measures depending on the level of noise reduction required at individual working areas (i.e. based on the construction threshold values for noise and vibration set out in Table 9.8: and Table 9.11).'* [Note - Table 9.8 of Section 9.2.4.1 of EIAR Chapter 9 sets out the Construction Noise Threshold (CNT) Levels for the Proposed Scheme].

Section 9.5.1.1.4 of Chapter 9 sets out the proposed working hours and states: *'It is envisaged that generally construction working hours will be between 07:00hrs and 23:00hrs on weekdays, and between 08:00hrs and 16.30hrs on Saturdays. Night-time and Sunday working will be required during certain periods to facilitate street works that cannot be undertaken under daytime / evening time conditions.'*

However, the contractor will also have to take account of sensitive receptors (in particular any nearby residential areas). Section 9.5.1.1.4 goes on to state: '*The planning of such works will take*

consideration of sensitive receptors, in particular any nearby residential areas. Construction activities will be scheduled in a manner that reflects the location of the site and the nature of neighbouring properties. Construction activities / plant items will be considered with respect to their potential to exceed construction noise thresholds at NSLs and will be scheduled according to their noise level, proximity to sensitive locations and possible options for noise control. In situations where an activity with potential for exceedance of construction noise thresholds is scheduled (e.g. road widening and utility diversions or activities with similar noise levels identified in Table 9.42), other construction activities will be scheduled to not result in significant cumulative noise levels'.

In summary the noise abatement measures set out in the EIAR that the appointed contractor will be required to put in place to comply with the limits detailed in Section 9.2.4.1 using methods outlined in BS 5228–1 will result in appropriate and adequate mitigation measures in respect of construction noise impact at this location during construction.

v) Development Plan Policy

It is considered that the Proposed Scheme remains compliant with the objectives of the Fingal Development Plan 2023-2029.

Within Appendix A2.1 Planning Report contained in the EIAR Volume 4 Appendices Part 1 of 4, Section 3.7.1 provides details of the Fingal Development Plan 2023-2029 and the key transport policies of particular relevance to the Proposed Scheme are set out in Table 3.11.

The zoning objectives of Fingal County Council are listed in Table 1.2 of Appendix A2.1 Planning Report. The Proposed Scheme objectives meet the residential planning objective to *'provide for residential development and protect and improve residential amenity'.*

vi) Devaluation of Property

EIAR Chapter 10 'Population' includes Appendix A10.2 'Economic Impact of the Core Bus Corridors'. Section 3 on page 14 of the appendix assesses what the economic impact of the provision of bus corridor infrastructure on the communities along the route using evidence from international Case Studies for similar schemes. This economic impact include effects on property values The conclusion reached is that in overall terms '*the public realm improvements planned by the NTA may in fact lead to an increase in value of both residential and retail property prices, especially in the community centres along the corridors.'*

Chapter 10 (Population) in Volume 2 of the EIAR includes an assessment of the impact on commercial properties as a result of land take during both the Construction Phase (Section 10.4.3.2.2.1) and the Operational Phase (Section 10.4.4.2.2.1). The commercial properties which were assessed are listed in the Chapter's Appendix A10.1 (Schedule of Commercial Businesses) in Volume 4 Part 3 of the EIAR, of which the Kealy's Pub is entry number 19. The property was not assessed as being significantly impacted by either the construction or operation of the Proposed Scheme as summarised in the aforementioned sections. The impact of land take on commercial receptors across the Swords community area as a whole is considered Negative, Not Significant and Temporary/Short-Term during the Construction Phase. While the impact during the Operation Phase is assessed as Negative, Not Significant and Long-Term impact.

Based on the above text, it is considered that a combination of improved connectivity as a result of the dedicated public transport infrastructure being rolled out by the Proposed Scheme as well as public realm improvements, will not have a negative impact on values of commercial properties on Swords Road. If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage its agent/valuer in preparing, negotiating, and advising on compensation.

2.10.8 CPO-23 – O'Scanaill Veterinary Hospital

2.10.8.1 Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor, it is proposed to upgrade the roundabout to a signalised junction. New access arrangements are proposed at Swords Veterinary Hospital. It is proposed to provide a footpath, cycle track, bus lane and general traffic lanes in each direction.

The existing road cross section in this location provides a footpath on each side of the road with two general traffic lanes each direction.

In order to achieve the required cross section of the Proposed Scheme land acquisition is necessary from private properties along this section of Swords Road.

The land take required is shown in the following:

- relevant extract of the EIAR Volume 3 Figures Chapter 4 Proposed Scheme Description Figures, General Arrangement drawings in Figure 2.61
- and the existing aerial view in Figure 2.62.

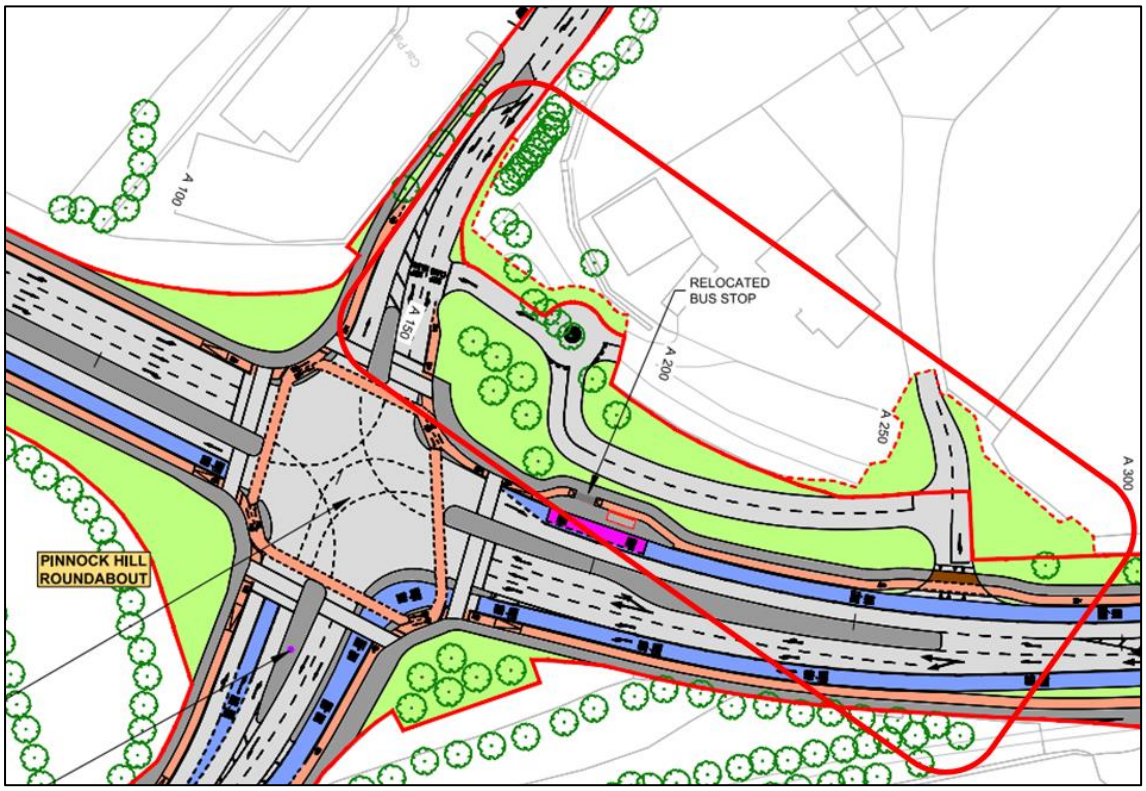

Figure 2.61 Proposed new Layout at Ó'Scanaill Veterinary Hospital

Figure 2.62 Existing aerial view at Ó'Scanaill Veterinary Hospital

2.10.8.2 Summary of Objections Raised

The objection to the CPO raises two potential issues:

i) Access and Egress

The objection considers that the scheme proposes to change the current access arrangements for the site by removing the 2 no. existing access points and replacing them with 1 no. new access point and considers that any alteration to access points could have severe implications for the facility's ability to maintain its parking operations effectively. The submission considers that the works illustrated on the general arrangement drawings will result in the loss of 5 no vehicular parking spaces and will require all vehicles to perform excessive reverse manoeuvres creating traffic hazard. This is apparently based on a perception that Heavy Goods Vehicles (HGVs) can only enter and exit the premises vis the proposed roundabout to the north of the premises..

ii) Noise and Vibration

The objection considers that as part of the CPO, the portion of lands to be acquired, including the dense hedgerows to the front of the property, currently provides protection against noise and dust from the existing road. During the construction phase it is considered that noise, vibration and dust levels will increase for approximately 12 months. The objection questions why this potential disruption has not been considered as part of the Noise and Vibration chapter.

2.10.8.3 Response to Objections Raised

i) Access and Egress

The NTA has actively engaged with the landowner since 2018 in respect to the Emerging Preferred route at Pinnock Hill and will continue to do so with respect to specific details. This engagement has included Teams meetings, phone calls and on-site meetings with the engineering design team relating to access provisions with revisions made to the Proposed Scheme to take account of concerns.

As part of the Proposed Scheme, it is proposed to upgrade the existing roundabout at Pinnock Hill Roundabout to a signalised junction to provide improved bus priority, and pedestrian and cyclist facilities.

Vehicles will not be required to reverse to exit the premises. Access to the practice will continue to be maintained from the R132 as requested in the submission. This will also ensure that the access to the paddocks will be maintained.

The existing access/egress to the Swords Veterinary Hospital at the Pinnock Hill roundabout is to be extinguished under the Proposed Scheme. Alternative access and egress will be provided by means of upgrading the existing R132 access, which will serve both the business and residential properties, and the creation of a new exit onto the R125, as indicated in Figure 2.63.

Under the Proposed Scheme all clients, including cars, SUVs, LGVs and HGVs, will enter the business by means of the upgraded R132 access. HGVs, and clients travelling west to Swords or northbound on the R132, will leave the practice via the R125 exit. Clients travelling southbound will use the R132 access/exit.

HGVs can continue to enter the practice via the existing R132 access under the Proposed Scheme, but instead of exiting via the proposed mini roundabout as described in the submission, they will leave through the proposed R125 exit.

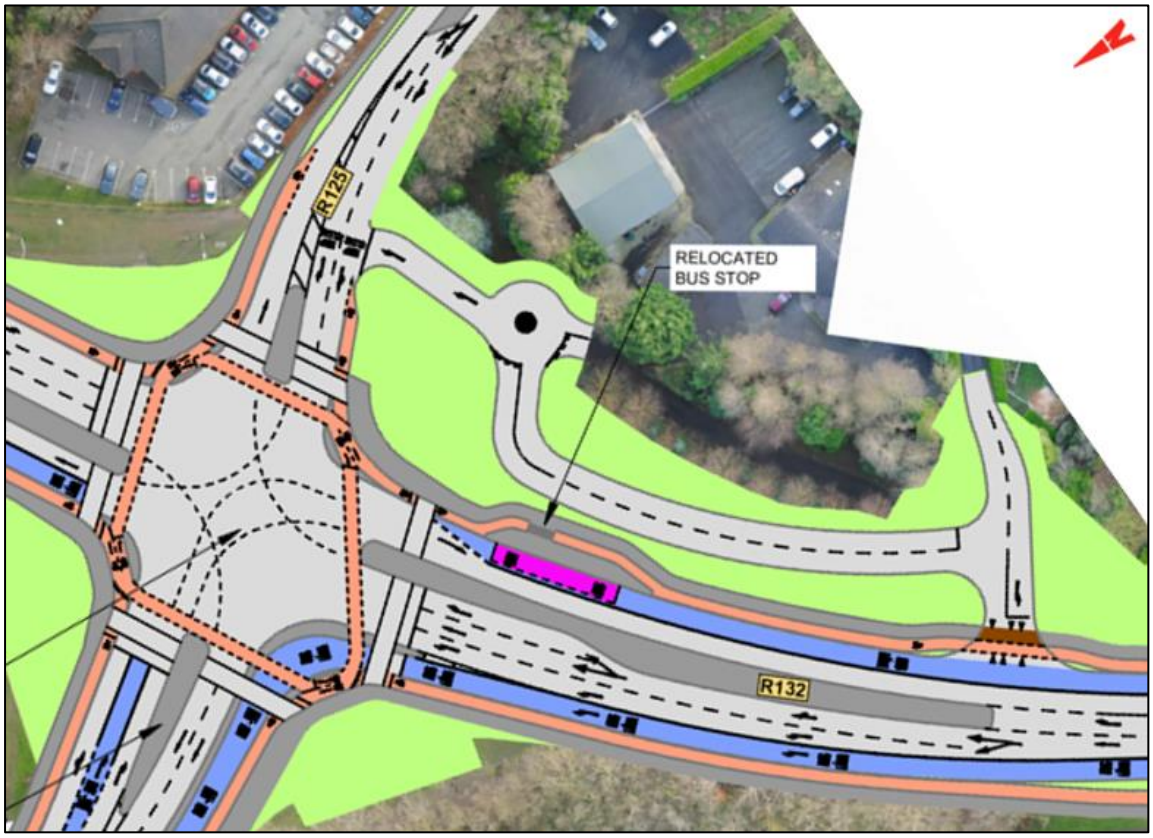

Figure 2.63 Proposed Access/Egress Arrangement for Ó'Scanaill Veterinary Hospital

Under the Proposed Scheme, a mini roundabout will tie in with the existing access road between the Pinnock Hill roundabout and the car park to the veterinary practice. All vehicles will thus be able to continue to execute the manoeuvres described in the Impact Report presented with the submission.

HGVs will not be required to turn within the carpark. Instead as described above, HGVs will be able to enter via the R132 access and then continue on to exit via the R125. Therefore there is no anticipated impact on the existing vehicular parking for the practice.

ii) Noise and Vibration

EIAR Volume 2 Chapter 9 Noise and Vibration Sections 9.4 to 9.6 discuss the potential impacts, mitigation measures and residual impacts of the construction and operational phases of the Scheme. EIAR Volume 2 Chapter 5 Construction Section 5.3.2.2 lays out the construction that will take place in Section 1, commenting that construction near this plot will last approximately 12 months. However, construction activities at individual plots will have shorter durations than outlined in overview of construction works presented Section 5.3.

Section 9.5.1 of Chapter 9 describes the noise and vibration mitigation measures during the Construction Phase. All of these measures are also recorded in Chapter 22 (Summary of Mitigation and Monitoring Measures) in Volume 2 of the EIAR, and are listed in Appendix A5.1 (Construction Environmental Management Plan (CEMP)) in Volume 4 Part 1 of the EIAR.

Section 9.4.3.2 of Chapter 9 sets out the calculated construction noise levels associated with various phases of work. For each element of work, noise levels are calculated for varying distances from an activity in the absence of noise mitigation. Under each activity is it noted that the identified NSLs is not an exhaustive list of properties at varying distances. For a long linear project of this nature, it is not possible to list each building in the vicinity of a working area, however it is intended that the reader can interpret impacts at their properties based on NSLs at similar distances. The impacts are further described in full in Table 9.44 for each collection of properties depending on their distance from the works.

A noise survey was undertaken within the ground of the veterinary hospital, adjacent to the residential property and hence both the residential property and the veterinary hospital form part of the assessment and have been considered as part of the overall impact assessment based on the approach discussed above.

Section 9.5.1.1 of Chapter 9 describes a number of measures including selection of quiet plant, noise control at source, screening, managing work hours, liaison with the public and monitoring of noise levels. It states that '*The appointed contractor will put in place the most appropriate noise control measures depending on the level of noise reduction required at individual working areas (i.e. based on the construction threshold values for noise and vibration set out in Table 9.10 and Table 9.13). Reference to Table 9.44 indicates that intrusive works occurring within 75m of NSLs with a direct line of sight to work will need specific noise control measures to reduce impacts depending on time period over which they will occur (i.e. daytime or evening)*'.

It is noted the existing hedgerows which bound the property and R132 are not relied upon for noise screening. From a noise point of view, due to the porous nature of vegetation, they provide a minimal level of noise screening. During the construction phase, the use of screening via site hoarding or localised demountable screens will be used to control noise emissions which are significantly more effective compared to vegetation. The landscaping plan for the proposed project includes replanting of trees to and hedgerows along the site boundary.

Highest residual construction noise levels at the veterinary hospital buildings will occur during road widening and utility diversion works. There is potential for a negative, slight to moderate and temporary impact within 20m from the proposed works during daytime periods and negative, moderate to significant and temporary within 20m during evening or Saturday periods. During other activities, impacts will be lower and hence over the full 12 month construction duration, the majority of works will result in a not significant to moderate and temporary noise impact. The paddock area extends between approximately 40m to 150m from the works boundary. Residual construction noise levels for all phases at these distances are below the construction noise thresholds or the baseline noise environment and hence the impact is negative, not significant and temporary.

2.10.9 CPO-25 – Sean Smith

2.10.9.1 Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor, it is proposed to provide a footpath, a bus lane and two general traffic lanes in each direction, along with a two-way cycle track on the outbound side.

The existing road cross section in this location provides a shared cycle track and footpath, with two general traffic lanes and a bus lane in each direction.

In order to achieve the required cross section of the Proposed Scheme land acquisition is necessary from private properties along this section of Swords Road.

The land take required is shown in the following:

- relevant extract of the EIAR Volume 3 Figure Chapter 4 Proposed Scheme Description Figures, General Arrangement drawings in Figure 2.64
- and the existing aerial view in Figure 2.65.

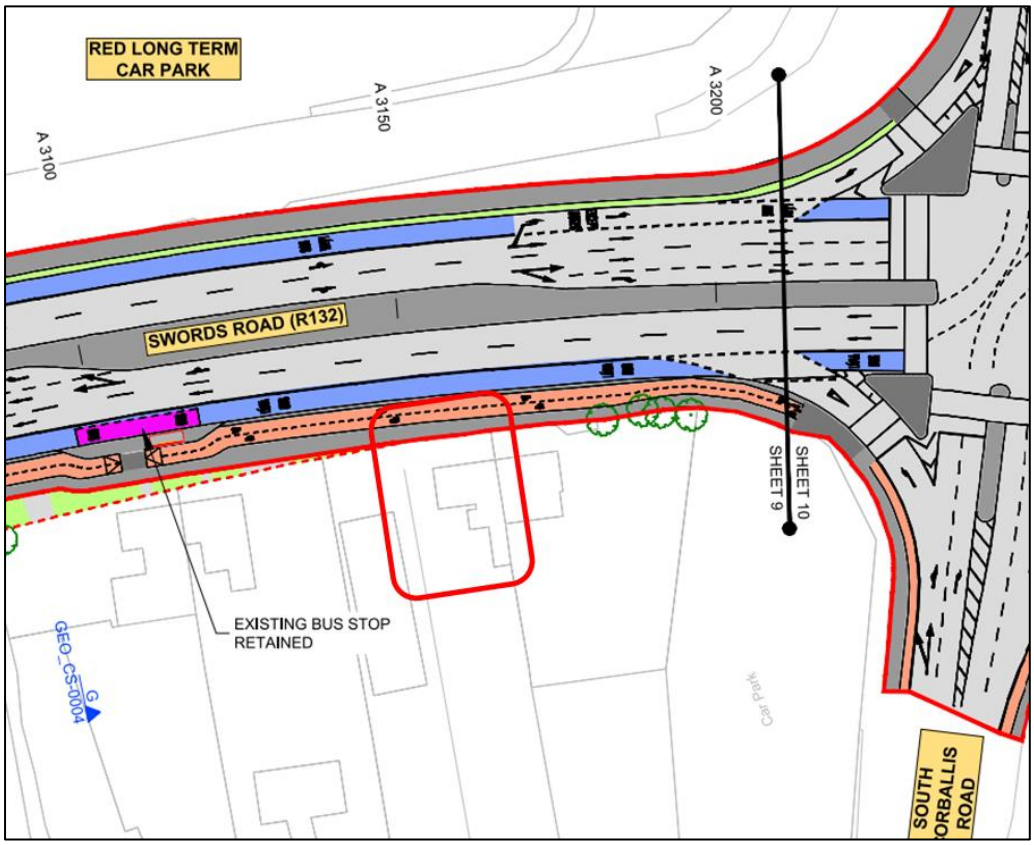

Figure 2.64 Proposed new Layout on Swords Road (R132)

Figure 2.65 Existing aerial view on Swords Road (R132)

2.10.9.2 Summary of Objections Raised

The objection to the CPO raises nine potential issues:

i) Compensation

The objection considers that this CPO would lead to loss of parking, road frontage, privacy, safety and access, and that any compensation would need to be in line with market values of land and carparking.

ii) CPO

The objection considers a previous CPO which led to the loss of a substantial amount of land for airport development. They are not in favour of CPO as levels of use of the existing cycle lane are quite small.

iii) Cycle Track / Footway

Reconstruction of the existing footpath is considered as having potential to cause disturbance to their property, which is stated as being very old in nature, and that any construction work would need to take into account the age of the existing property and the effect it would have on it.

The objection highlights concerns regarding the loss of right of way temporarily as the driveway will exit directly on to a footpath and notes the potential legal implications driving on to a public footpath and cycle lane.

iv) Drainage

The objection states that the plot of land required for the footpath and cycle lane provides drainage from the existing cycle lane and flood defence to the property. This area is noted by the objection as having been subject to flooding in the past, and that any new development or change to infrastructure would need an assessment of flood risks.

v) Environmental Impact

A concern was raised by the objection considering the loss of green area as being to the detriment to environment.

vi) Noise

The objection states that a high wall would be needed at front of property to act as a buffer to noise and increased cycling activity and scooters.

vii) Parking

The objection notes that the plot referred to in CPO is needed for parking close to the property as a resident has a back disability and that there is no on street parking due to the 24-hour bus lane.

viii) Privacy

The objection expresses concern regarding the loss of privacy as the footpath will be closer to the house than it currently is.

ix) Safety

The objection raises concerns pertaining to potential danger to public from exiting on to footpath from house entrance with increased risk of accidents exiting the property leading to insurance claims from members of the public, no public indemnity for property owner.

2.10.9.3 Response to Objections Raised

i) Compensation

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage your its agent / valuer in preparing, negotiating and advising on compensation.

ii) CPO

The Proposed Scheme has been designed to deliver upon the scheme objectives set out in Chapter 1 of the EIAR, which include enhancement of the potential for cycling by providing safe infrastructure for cycling. In this case land acquisition is required to deliver what has been determined to be the most appropriate design configuration that meets the scheme objectives, by introducing a two way cycle track to cater for inbound cyclists.

The decision to acquire land has not been taken lightly and all areas included in the CPO have been carefully considered and only included where deemed absolutely necessary to meet the scheme objectives and to construct the scheme with permanent and temporary acquisitions respectively.

In this specific area, the proposed cross-section and subsequent land acquisition have been considered and deemed necessary to facilitate the optimum scheme as presented in EIAR Volume 3 Chapter 4 Proposed Scheme Description Figures, General Arrangement drawings.

Chapter 10 (Population) in Volume 2 of the EIAR includes an assessment of the impact on residential properties as a result of land take during both the Construction Phase (Section 10.4.3.1.2.1) and the Operational Phase (Section 10.4.4.1.2.1). The residential property is located within the Swords Community Area and was not assessed as being significantly impacted by either the Construction or Operational Phases of the Proposed Scheme as summarised in the

aforementioned Sections. Only properties which were to be significantly impacted were specifically discussed within the Chapter.

iii) Cycle Track / Footway

It is not envisioned that the widening of the cycle track would cause any damage to the property.

Section 9.5.1.2 of Chapter 9 Noise and Vibration of Volume 2 of the EIAR describes the likely vibration levels associated with construction activities, it is considered that the construction of the Proposed Scheme is not expected to give rise to vibration that is either significantly intrusive or capable of giving rise to structural or cosmetic damage to buildings. Vibration from construction activities will be limited to the values set out in Table 9.10 to avoid any form of potential cosmetic damage to buildings and structures. Monitoring will be undertaken at identified sensitive buildings, where proposed works have the potential to be at or exceed the vibration limit values in Table 9.10.- Recommended Construction Vibration Thresholds for Buildings.

In relation to the respondents concerns regarding the loss of right of way, under S.I. No. 182/1997 Section 13 Driving on Footway, a vehicle is allowed to be driven across the footpath for the purpose of access to or egress from a place adjacent to the footpath, and in accordance with S.I. No. 182/1997 Section 14 Cycle Tracks, that a vehicle is also allowed to be driven across the cycle track for the purpose of access to or egress from a place adjacent to a cycle track. It is not anticipated that entry / exit to / from the property will result in any prolonged blocking of the bus lane, cycle track or footpath.

iv) Drainage

Chapter 13 (Water) Appendix A13.2 (Flood Risk Assessment) in Volume 4 Part 3 of the EIAR describes the Flood Risk Assessment (FRA) undertaken for the Proposed Scheme. This FRA includes an assessment of the flood risk due to climate change (Section 5.6) which considers mean sea level rise, river flows, and extreme rainfall depths.

In addition to the FRA undertaken, Chapter 4 (Proposed Scheme Description) in Volume 2 of the EIAR describes the drainage design for the Proposed Scheme (Section 4.6.15), while the Proposed Surface Water Drainage Works figure in Volume 3 of the EIAR shows the design in more detail. In order to ensure that the increase in impermeable area from the Proposed Scheme does not increase the potential for flooding into the future as a result of climate change, Sustainable Drainage Systems (SuDS) have been included in the Drainage Design and:

'*All drainage structures for newly paved areas are designed with a minimum return period of no flooding in 1:30 years with a 20% climate change allowance*.'

v) Environmental Impact

With regards to loss of green area, Biodiversity is assessed in Chapter 12 of the EIAR. Natural Heritage Areas (NHAs) and Proposed Natural Heritage Areas (pNHAs) are designations under section 18 of the Wildlife (Amendment) Act to protect habitats, species or geology of national importance. These are listed in Table 12.9 and illustrated in Figure 12.4 in Volume 3 of the EIAR. No. 2 Corballis Road does not fall within any NHAs nor pNHAs.

The non-Fossitt classification of 'residential' is used to '*represent residential properties along the Proposed Scheme corridor and generally consists of a mosaic of buildings and artificial surfaces (BL3), amenity grassland (GA2), flower beds and borders (BC4), ornamental shrubs (WS3) and hedgerows (WL1)*' as defined in Section 12.3.5.14 of Chapter 12. This habitat type was commonly encountered and was present across the entire scheme (illustrated in Figure 12.5 in Volume 3 of this EIAR). This habitat type is of Local Importance (Lower Value). Section 12.4.3.2.1 and Table 12.6 in Chapter 12 provides the estimated extent of total habitat loss across the Proposed Scheme. The loss of habitats outside of designated areas for nature conservation is assessed as being a 'Likely significant effect at the local geographic scale' during the Construction Phase as set out in Table 12.19 in Chapter 12. Mitigation against the impact of habitat loss across the Proposed Scheme is stated in Section 12.5.1.2.1 of Chapter 12 and includes:

'*Where practicable, areas of vegetation, including habitats of Local Importance (Higher Value), such as mixed broadleaved woodland, mixed broadleaved conifer woodland, scattered trees and*

parkland, immature woodland, treeline and hedgerow habitat types) which lie within the footprint, or along the boundary of the Proposed Scheme, will be retained'; and

'*To mitigate the loss of habitat, proposed planting incorporated into the Proposed Scheme will be implemented by the appointed contractor*'.

vi) Noise

With respect to construction noise impacts, as noted in Volume 3, Figure 9.3 in Volume 3 (Sheet 2 of 5) of the EIAR, a Not Significant / Slight noise impact is forecast along Swords Road in the vicinity of this plot.

The EIAR contains a comprehensive set of mitigation measures to minimise construction phase impacts, including noise impacts. Construction noise mitigation measures are set out in Chapter 9 in Volume 2 of the EIAR (and are also summarised in Appendix 5.1 (Construction Environmental Management Plan) in Volume 4 of the EIAR).

Section 9.5.1.1 of EIAR Volume 2 Chapter 9 states that: *'The appointed contractor will be required to take specific noise abatement measures to the extent required and comply with the recommendations of BS 5228–1 (BSI 2014a) and S.I. No. 241/2006 - European Communities (Noise Emissions by Equipment for Use Outdoors) (Amendment) Regulations 2006.'* It also states that '*During the Construction Phase, the appointed contractor will be required to manage the works to comply with the limits detailed in Section 9.2.4.1 using methods outlined in BS 5228–1 (BSI 2014a)*'

Section 9.5.1.1 also states that *'BS 5228–1 includes guidance on several aspects of construction site practices, which include, but are not limited to:*

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

Specifically, Section 9.5.1.1. states that *'The appointed contractor will put in place the most appropriate noise control measures depending on the level of noise reduction required at individual working areas (i.e. based on the construction threshold values for noise and vibration set out in Table 9.8: and Table 9.11).'* [Note - Table 9.8 of Section 9.2.4.1 of EIAR Chapter 9 sets out the Construction Noise Threshold (CNT) Levels for the Proposed Scheme].

Section 9.5.1.1.4 of Chapter 9 sets out the proposed working hours and states: *'It is envisaged that generally construction working hours will be between 07:00hrs and 23:00hrs on weekdays, and between 08:00hrs and 16.30hrs on Saturdays. Night-time and Sunday working will be required during certain periods to facilitate street works that cannot be undertaken under daytime / evening time conditions.'*

However, the contractor will also have to take account of sensitive receptors (in particular any nearby residential areas). Section 9.5.1.1.4 goes on to state: '*The planning of such works will take consideration of sensitive receptors, in particular any nearby residential areas. Construction activities will be scheduled in a manner that reflects the location of the site and the nature of neighbouring properties. Construction activities / plant items will be considered with respect to their potential to exceed construction noise thresholds at NSLs and will be scheduled according to their noise level, proximity to sensitive locations and possible options for noise control. In situations where an activity with potential for exceedance of construction noise thresholds is scheduled (e.g. road widening and utility diversions or activities with similar noise levels identified in Table 9.42), other construction activities will be scheduled to not result in significant cumulative noise levels'.*

In summary the noise abatement measures set out in the EIAR that the appointed contractor will be required to put in place to comply with the limits detailed in Section 9.2.4.1 using methods outlined in BS 5228–1 will result in appropriate and adequate mitigation measures in respect of construction noise impact at this location during construction.

Regarding the operational noise impact of the Proposed Scheme, Section 9.4.4.1 of EIAR Volume 2 Chapter 9 Noise and Vibration provides details of the assessment undertaken for the Operational

Phase of the Proposed Scheme in respect of the potential noise and vibration impacts associated with altered traffic flows, realigned traffic lanes and displaced traffic flows.

Section 9.4.4.1.1.5 states that '*Along the majority of roads of the Proposed Scheme within the 1km study area, impacts as a result of traffic redistribution are determined to be Indirect, Positive, Imperceptible to Slight to Moderate, and Short to Medium Term to Negative, Moderate, and Short to Medium term once the Proposed Scheme becomes operational*.' It goes on to state that '*There are a small number of roads in the overall study area where there are potential initial significant impacts. These are defined as roads with a traffic noise level above a daytime noise level of 55 dB LAeq,16hr an increase in noise level greater than 3 dB*.' Table 9.45 lists these roads and Swords Road is not included in Table 9.45.

Section 9.5.2.1 summarises the change in road traffic noise in the operation phase as follows: 'The impact assessment has determined that there are no calculated significant direct or indirect traffic noise impacts across the study area for the Proposed Scheme. The range of noise level changes and overall noise levels calculated do not require any specific noise mitigation measures to be incorporated into the Proposed Scheme.'

In respect of electric buses, as discussed in Section 9.4.4.1.1.4 of Chapter 9, during the proposed Opening Year (2028), the NTA forecast is for 94% of the city bus fleet to be EVs or HEVs. For the Design Year (2043), the city bus fleet is forecast to be 100% electric. The operation of electric and hybrid buses will eliminate ICE noise from buses accelerating, decelerating and idling at bus stops which is the dominant noise source.

In addition, the characteristic of noise from EVs is subjectively less intrusive compared to those with ICE's and is masked to a much greater extent by surrounding road traffic. It is noted the bus stops along the Proposed Scheme will be used by other bus operators which may not transition to EV and HEVs over the same period as the city bus fleet. The volume of these buses along the Proposed Scheme will, however, be significantly less than the city bus fleet and hence, noise levels associated with these areas will not generate significant noise levels over the prevailing noise environment.

vii) Parking

The parking space within the existing green area identified in this objection has not been identified as a formal parking space in Parking and Loading assessment described in Section 6.4.6.1.3.4 of Chapter 6 Traffic and Transport of Volume 2 of the EIAR due to the presence of grass and absence of relevant signage and demarcation.

It is evident that there is an entrance gate with a driveway to the side of the property which is appropriate for parking at this property. The exact details of any reconfiguration required during construction and in the permanent situation can be discussed with the landowner prior to the commencement of any works.

Regarding construction impacts, 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 Section 5.5.3.1 of Chapter 5 Construction of Volume 2 of the EIAR, '*details regarding temporary access provisions will be discussed with residents and business owners prior to construction starting in the area. The duration of the works will vary from property to property, but access and egress will be maintained at all times'*.

viii) Privacy

In respect of loss of privacy, if the CPO is confirmed by An Bord Pleanála. Reinstatement of property frontage including boundary walls, gates, railings, driveway, footpath and landscaping will be on a like for like basis and detailed accommodation works plans will be prepared in consultation with landowners in line with any formal agreements and in accordance with any embedded mitigations identified in the EIAR or conditions/modifications from An Bord Pleanála in relation to the Proposed Scheme application.

ix) Safety

The Road Safety Audit undertaken for the Proposed Scheme, included as Appendix M2 of the Preliminary Design Report provided in the Supplementary Information did not mention any issues

regarding exiting onto the footpath from the property as a safety issue. Also, in relation to S.I. No. 182/1997 Section 13 Driving on Footway, a vehicle is allowed to be driven across the footpath for the purpose of access to or egress from a place adjacent to the footpath, and in accordance with S.I. No. 182/1997 Section 14 Cycle Tracks that a vehicle is also allowed to be driven across the cycle track for the purpose of access to or egress from a place adjacent to a cycle track. Therefore this arrangement should not be considered a safety concern.

2.10.10 CPO-26 – Sorallon Limited

2.10.10.1 Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor, it is proposed to provide a footpath, cycle track, and one traffic lane outbound and two traffic lanes inbound, along with a bus lane in the inbound direction.

The existing road cross section in this location provides a footpath and a 1.5m wide advisory cycle lane in the outbound direction while there is a 1.2m wide advisory cycle lane on the inbound direction, with one traffic lane outbound and two traffic lanes inbound.

In order to achieve the required cross section of the Proposed Scheme land acquisition is necessary from private properties along this section of Swords Road. As described in Section 4.5.5.1 of Chapter 4 of Volume 2 of the EIAR, the cross-section proposed has been designed so as to minimise the extent of necessary land acquisition.

The land take required is shown in the following:

- relevant extract of the EIAR Volume 3 Figure Chapter 4 Proposed Scheme Description Figures, General Arrangement drawings in Figure 2.66.
- and the existing aerial view in Figure 2.67.

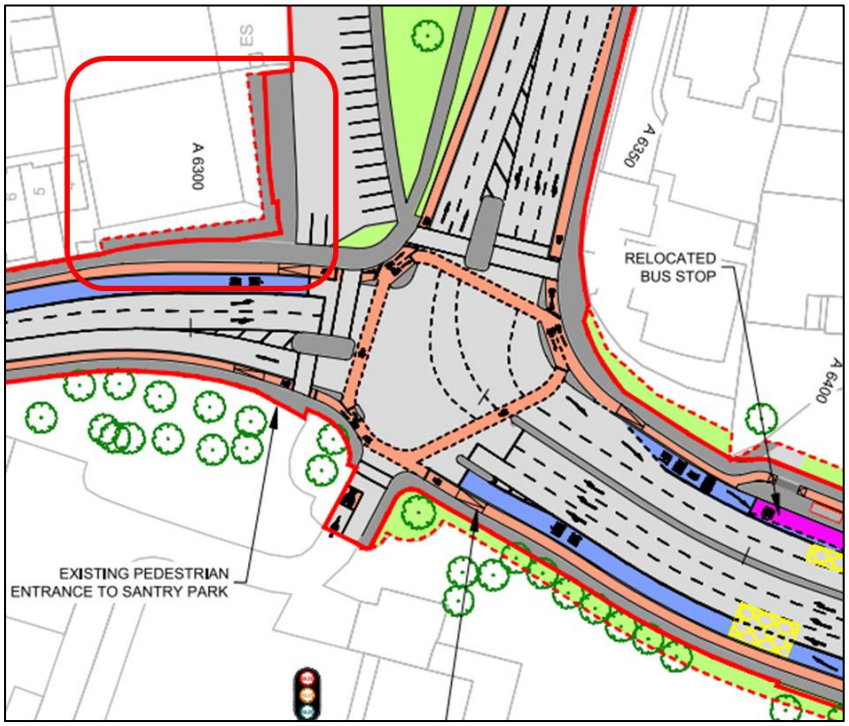

Figure 2.66 Proposed new Layout on Swords Road (R132)

Figure 2.67 Existing aerial view on Swords Road (R132)

2.10.10.2 Summary of Objections Raised

i) Incorrect site boundaries and extents of proposed land acquisition

The objection states that the proposed maps supplied by the NTA with regard to both the boundaries of their client's site and the areas for proposed land acquisition are incorrect.

ii) Loss of existing private off-street parking to Swords Road frontage

The objection states that the proposed location of the cycle lane will potentially close off the existing private parking to the front curtilage of the property. The objection has concerns over the potential impact the proposed bus corridor and cycle lane will have on parking and access to their client's property.

iii) Loss of potential outdoor seating to Swords Road frontage

The objection notes that the proposed widening of the road to allow for cycle path and bus lane could limit the amount of potential outdoor seating area allowed to the front curtilage of their client's property. The objection outlines that a planning permission is in the process of being submitted to FCC in respect of changes to the layout and use of the existing commercial ground floor premises. The respondent's clients are concerned that the proposed development would detract from the planning potential for the use of this outdoor space.

iv) Loss of existing customer parking due to Proposed end-of-line bus parking

The objection notes the proposal for 3 new covered bus stops in the area directly to the east of their client's property. The objection states that despite this proposed increased activity, no allocation of extra parking has been made in the plans submitted by the NTA for this site.

The owner as well as existing tenants also use this car park and they note that the potential availability of parking for customers will no doubt be affected by users of the Bus Network, not only by those dropping off and picking up at the site but also the potential for Dublin Bus commuters to leave their cars on- site for hours.

v) Potential Impact on future residential development of property

The objection has concerns over the potential impact increased parking from Bus Network customers will have on future planning applications for more retail or new residential development.

2.10.10.3 Response to Objections Raised

i) Incorrect site boundaries and extents of proposed land acquisition

Information gathered as part of our Title Research is set out in our CPO schedule. The NTA notes the comments set out in the objection. The NTA also notes that contact was made with the property owner in advance of the CPO server packs being issued however this land boundary information was not brought to our attention until after the issue of the CPO server packs.

ii) Loss of existing private off-street parking to Swords Road frontage

In accordance with S.I. No. 182/1997 Section 14 Cycle Tracks, a vehicle is also allowed to be driven across the cycle track for the purpose of access to or egress from a place adjacent to a cycle track. A dropped kerb would be provided to facilitate vehicles driving across the cycle track to access the existing parking bays at this property.

iii) Loss of potential outdoor seating to Swords Road frontage

NTA notes that at the time of the submission of the application, there were no records of an application for outdoor seating area. If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage your its agent / valuer in preparing, negotiating and advising on compensation.

The impact of the loss of this seating will be reviewed as part of the landowners claim for compensation if planning approval for seating has been granted at time of Notice to Treat.

iv) Loss of existing customer parking due to proposed end-of-line bus parking

At this location a terminus for the D4 route is proposed in the green space at the junction of Coolock Lane and the Swords Road. A terminus is a mechanism for buses on the D4 route to turn around and go back out on their route. The proposals at this location are not anticipated to result in any change to parking demand or numbers of parking spaces.

v) Potential Impact on future residential development of property

The Proposed Scheme has been designed so as to respect the existing arrangements. Granted permissions have also been considered in the development of the Proposed Scheme however any future developments which come online will need to propose any infrastructure required for their planning application. The NTA will continue to engage with the relevant local authorities and developers with regards to future schemes.

As noted in point iv), the scheme proposals at this location are not anticipated to result in any change to the existing number of parking spaces.

2.10.11 CPO-27 – Tesco Ireland

2.10.11.1 Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor, it is proposed to provide a 2m wide footpath, 2m wide cycle track, bus lane and general traffic lane in each direction.

The existing road cross section in this location provides a footpath on each side of the road along with a 1.5m wide advisory cycle lane in the outbound direction only, with one general traffic lane and a bus lane in each direction. .

In order to achieve the required cross section of the Proposed Scheme land acquisition is necessary from private properties along this section of Swords Road.

The land take required is shown in the following:

- relevant extract of the EIAR Volume 3 Figure Chapter 4 Proposed Scheme Description Figures, General Arrangement drawings in Figure 2.68.
- and the existing aerial view in Figure 2.69.

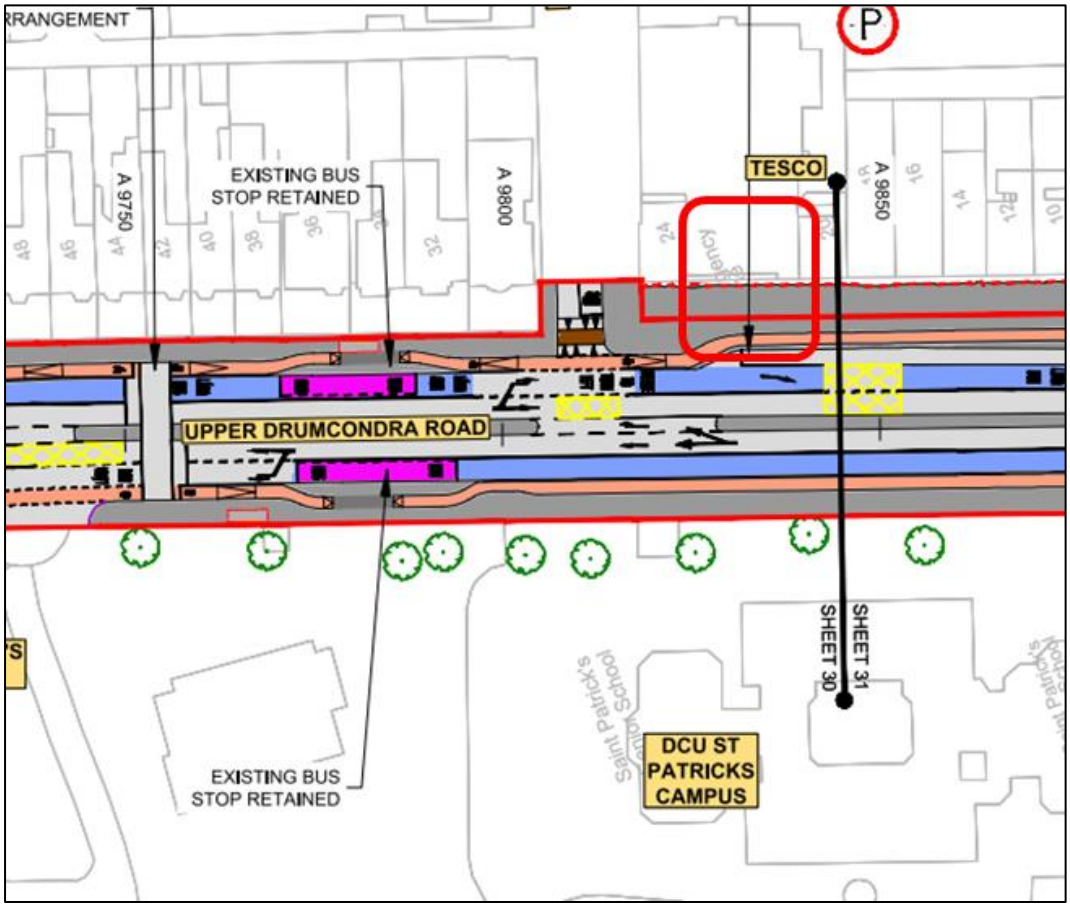

Figure 2.68 Proposed new Layout on Upper Drumcondra Road

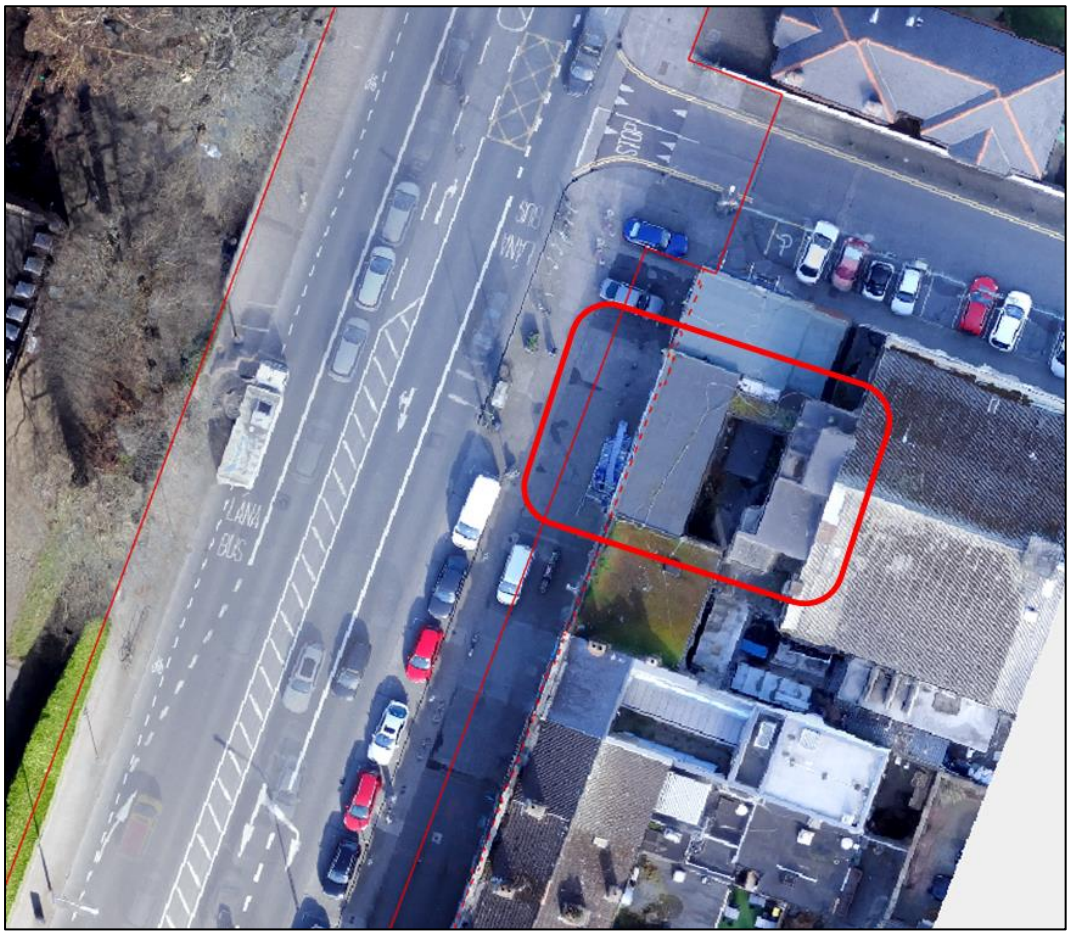

Figure 2.69 Existing aerial view on Upper Drumcondra Road

2.10.11.2 Summary of Objections Raised

ii) Duration of Works

The respondent's client expresses concern regarding the timing and duration of the temporary acquisition of the lands.

iii) Parking (Loading)

During Preferred Route Option stage, the objection considers that a portion of the parking proposed outside the store situated on Drumcondra Road was requested to be designated as a loading bay, and the objection notes that it appears this space has been extended without any designated loading bay facilities.

The objection notes that their preference is for no raised kerbs between space designated as 'loading bay' and cycle track as this can act as an impediment and where possible the provision of a buffer zone between the loading bay and cycle track that could accommodate delivery cages that are 846mm wide. Additionally, the objection would like to suggest that bollards/warning signs are erected.

Additional comments were also raised at two other locations where no CPO is proposed. These are summarised below:

<u>Omni Shopping Centre</u>

The objection notes that changes are proposed at the service yard entrance to Omni Shopping Centre. It is requested that any proposed alterations are carefully considered by the NTA at detailed design stage so that the junction can continue to facilitate HGV access to the service yard in a safe manner.

Additionally, the impact of any change on levels/raised crossings and driver visibility to oncoming traffic and vulnerable road users will need to be carefully considered at further design stages.

Dorset Street

The inclusion of a designated loading bay would be welcomed by Tesco on Dorset Street Lower. It is also requested that consideration is given at detailed design stage for the materials/treatments between the loading bay and cycle track to facilitate the movement of stock and goods to the premises.

2.10.11.3 Response to Objections Raised

Tesco's support for the scheme is noted and welcomed by the NTA.

i) Duration of Works

Section 5.3.4.2 of Chapter 5 of Volume 2 of the EIAR provides details of the construction activities along Drumcondra Road Upper and Drumcondra Road Lower, between Griffith Avenue and Botanic Avenue.

The expected construction duration for the section will be approximately 18 months. However, construction activities at individual plots will have shorter durations than outlined in overview of construction works presented Section 5.3. As described in Section 5.5.3.1 of Chapter 5 of Volume 2 of the EIAR, details regarding temporary access provisions will be discussed with residents and business owners prior to construction starting in the area. The duration of the works will vary from property to property, but access and egress will be maintained at all times.

ii) Parking (Loading)

In developing the design of the Proposed Scheme, the NTA has balanced the need to provide parking and loading with the objectives of the Proposed Scheme to provide high quality public transport, cycling and walking facilities through this area. Section 6.4.5.4.5 of Chapter 6 Traffic and Transport of Volume 2 of the EIAR identifies that '*Parking and loading locations may be temporarily impacted by construction activities along the Proposed Scheme corridor. There may be temporary restrictions to on-street parking and loading facilities. The appointed contractor will discuss temporary traffic management measures with the road authority and directly affected residents/business with the aim of minimising disruption. Therefore, the anticipated impact on parking and loading during the Construction Phase will be Negative, Slight and Temporary.'*

Section 4.5.4.7 of Chapter 4 Proposed Scheme Description of Volume 2 of the EIAR summarises that there will be no changes to the parking and loading provisions along Drumcondra Road Upper. Table 4.1 in the Preliminary Design Report provided in the Supplementary Information identifies that for parallel parking bays a buffer zone of 0.75m wide is provided between the parking bays and the cycle track. This buffer is to protect cyclists from opening doors.

The NTA does not appear to have a record of submission described in the objection.

Detailed accommodation works plans will be prepared in consultation with landowners in line with any formal agreements and in accordance with any embedded mitigations identified in the EIAR or conditions/modifications from An Bord Pleanála in relation to the Proposed Scheme application.

This objection raises comments at three locations along the scheme where there are Tesco stores. It is noted that CPO is only required at one of these locations, Drumcondra Metro. The other two are general comments/observations in relation to proposals in the vicinity of Tesco stores at Omni Shopping Centre and Dorset Street. Whilst there is no CPO at these locations these comments have also been responded to below.

Omni Shopping Centre

The NTA notes the comments regarding the treatment of the service yard entrance to Omni Shopping Centre. As stated in Section 4.8 of the Preliminary Design Report, included in the Supplementary Information,

'In line with the Proposed Scheme objectives of improving facilities for walking and cycling, corner radii along the route have been reduced where appropriate in order to lower the speed at which vehicles can turn corners, and to increase inter-visibility between users.

Junctions are where the actual and perceived risk to both cyclists and pedestrians are highest and usually represent the most uncomfortable parts of any journey. In order to provide a design whereby vehicles navigate through turns at a reduced speed, thereby reducing the risk of serious collisions, kerb and footway buildouts have been included on the majority of the designed junctions along the route, thus adhering to design guidance given within the DMURS document, where it is stated:

> *'Build-outs should be used on approaches to junctions and pedestrian crossings in order to tighten corner radii, reinforce visibility splays and reduce crossing distances.''*

The corner radius is often determined by swept path analysis. While swept path analysis should be considered, the analysis may overestimate the amount of space needed and / or the speed at which the corner is taken. The design balanced the size of the corner radii with user needs, pedestrian safety and cyclist safety and the promotion of lower operating speeds. In general, on junctions between Arterial and/or Link streets a maximum corner radius of 6m was applied. Which will generally allow larger vehicles, such as buses and rigid body trucks, to turn corners without crossing the centre line of the intersecting road.'

Swept path analysis was carried out considering a suite of vehicles which included articulated vehicles, as described in Section 4.8 of the Preliminary Design Report, no issues with swept path analysis were identified on the Proposed Scheme.

It is further noted that the Road Safety Audits undertaken for the Proposed Scheme, included as Appendix M of the Preliminary Design Report provided in the Supplementary Information, did not highlight any safety issues with the proposed arrangement at this location.

Dorset Street

As part of the Proposed Scheme, a loading bay is proposed near Tesco Metro on Dorset Street as indicated as indicated on Sheet 34 of 37 of the General Arrangement Drawings in the EIAR, Volume 3, Figures, Chapter 4 Proposed Scheme Description, 03. General Arrangement, see Figure 2.70. Table 4.1 in the Preliminary Design Report provided in the Supplementary Information identifies that for parallel parking bays a buffer zone of 0.75m wide is provided between the parking bays and the cycle track. This buffer is to protect cyclists from opening doors.

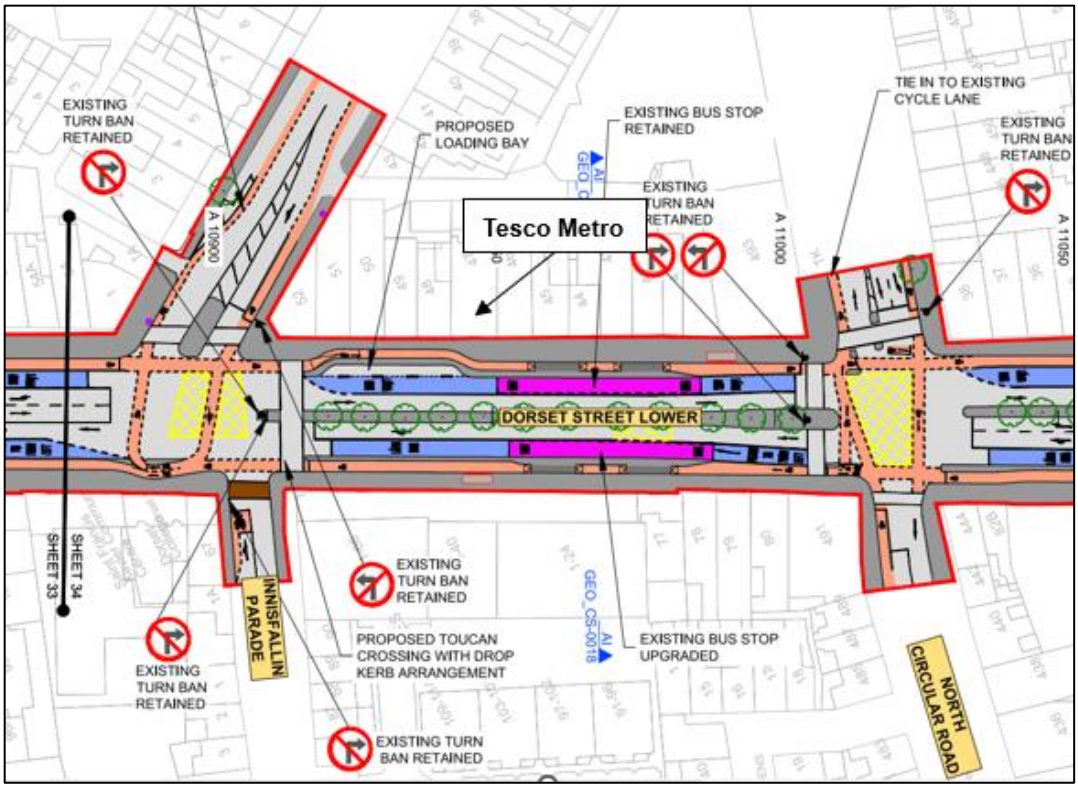

Figure 2.70 General Arrangement of Proposed Scheme at Tesco Metro, Dorset Street Lower (Sheet 34)