Kimmage to City Centre Core Bus Corridor Scheme

NTA Observations on the Proposed Scheme Section 51

June 2024

BUS CONNECTS

SUSTAINABLE TRANSPORT FOR A BETTER CITY.

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1. Introduction

This report provides a response to the submissions made to An Bord Pleanála ("the Board") in response to the application under Section 51 of the Roads Act 1993, as amended, for approval of the Kimmage to City Centre Core Bus Corridor Scheme ("the Proposed Scheme").

An overview of the submissions is provided in Section 1.2 below. The issues raised in the submissions on the Proposed Scheme, together with responses thereto are provided in Section 2.

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

1.1 Overview of Submissions Received

A total of 84 submissions were received by the Board.

The submissions in response to the Proposed Scheme are broken down into groups either associated with a particular location along the Corridor or of a more general nature below. Table 1.1 below sets out the locations referred to, the number of submissions on the Proposed Scheme referring to each location and the key issues raised by the submissions.

Table 1.1: Summary of Submissions in Response to the Proposed Scheme by Section

Section	Location	No. of submissions	Key Issues Raised
1	Lower Kimmage Road from Kimmage Crossroads to Junction with Harold's Cross Road.	61	• 30 km/h speed limit • Pedestrian facilities • Cycling facilities • Public realm improvements • Parking • Junctions • Bus shelters • Drainage and other details
2	Harold's Cross Road from Harold's Cross Park to Grand Canal	25	• Road widening impacts • Cycling facilities • Trees and public realm • Parking • Bus stops • Local traffic impacts • Drainage and other details
3	Clanbrassil Street Upper and Lower and New Street South from the Grand Canal to the Patrick Street Junction	24	• Alternative to widening at Robert Emmet Bridge and Visual impact of footbridges • Road widening on Clanbrassil Street Upper and historic wall • Removal of parking • Deliveries • Compound at St. Patrick's Court
Overall Scheme		10	• Strategic Environmental Assessment • Environmental Impact Assessment • Transport Strategy / bus services benefits / Traffic impacts / Combination with other schemes • Impacts for businesses • Pedestrian facilities • Cycling facilities • Consultation process

2. Response to Submissions on Proposed Scheme

2.1 Section 1 – Lower Kimmage Road from Kimmage Crossroads to Junction with Harold's Cross Road

2.1.1 Description of Proposed Scheme at this Location

The Proposed Scheme along this section of the corridor, is described in Section 4.5.1 of Chapter 4 of Volume 2 of the EIAR, Proposed Scheme Description:

This section of the Proposed Scheme will be approximately 2.2km long and will commence on R817 Kimmage Road Lower at the KCR Junction with R818 Kimmage Road West, R817 Fortfield Road and R818 Terenure Road West. The Proposed Scheme will proceed along R817 Kimmage Road Lower in a north-eastern direction generally and will conclude at the junction with R137 Harold's Cross Road at the northern end of Harold's Cross Park.

Priority for buses will be provided along the entire length of this section of the Proposed Scheme, with dedicated bus lanes in either direction over a length of 260m northbound, and 200m southbound from the KCR Junction to where a southern Bus Gate is proposed just north of the R817 Kimmage Road Lower and Ravensdale Park Junction. This Bus Gate will operate in tandem with a northern Bus Gate at Harold's Cross Park to preclude through-traffic over the intervening 2km length of this section, to R137 Harold's Cross Road at Harold's Cross Park. The Bus Gates will operate at peak times to secure bus priority by deflecting through-traffic off this route, while ensuring enhanced amenity for local residents with the development of a quieter street (with existing parking arrangements unchanged) than currently exists. Local traffic access will be diverted via Sundrive Road on the western side or Larkfield Avenue on the eastern side.

The provision of the southern Bus Gate at the Ravensdale Park Junction will be complemented by a number of traffic management measures on adjoining residential streets to prevent through-traffic or 'rat-running' as follows:

- Near the southern Bus Gate, Poddle Park to the west will be closed to through-traffic, except for cyclists, at the junction with Ravensdale Park;
- To the east of the southern Bus Gate, Derravaragh Road will be closed to through-traffic, except for cyclists, at the southern side of the junction with Corrib Road; and
- For southbound traffic diverted by the proposed southern Bus Gate, improvements will be made to the junction of R137 Harold's Cross Road and Kenilworth Park by way of the provision of a southbound right-turn to facilitate local access to R817 Kimmage Road Lower from the north. This will require adjustment to the junction for efficient traffic operation, and a westbound Bus Gate from Kenilworth Square will simplify the signal staging.

Segregated cycle tracks will be provided in either direction along the southern sub-section of the Proposed Scheme that precedes the Bus Gate at the Ravensdale Park Junction. After this point, the existing advisory cycle lanes will be retained and not altered, as the road conditions will be much enhanced as a result of the reduced general traffic restricted by the Bus Gate.

A secondary cycle route will also be designated, in parallel to R817 Kimmage Road Lower, along Poddle Park, Bangor Road, and Blarney Park to Sundrive Road. From Sundrive Road, cyclists will be able to proceed via a new connection to Mount Argus Way and Mount Argus View where a proposed steel boardwalk structure will be provided beside the River Poddle at the Stone Boat feature (as outlined in Section 4.6.8 and in Chapter 15 (Archaeological & Cultural Heritage).

At Harold's Cross Park south, it will be necessary to remove the existing footpath on the northern side of the street adjoining the park over a length of 50m so as to accommodate road widening for two-way traffic on the access route between the proposed Bus Gates to Mount Jerome Cemetery and Mount Argus Road. Most pedestrians walk through the park when it is open during the day. At other times there is the alternative footpath along the southern side of the street. The alternative to this proposal would be to remove the five on-street parking spaces in front of houses for which there is no other parking available nearby.

Within this section, there is one new major structure. The Stone Boat Boardwalk between Sundrive Road and Mount Argus View is a 4m wide and 42m long steel boardwalk structure for pedestrians and

cyclists that will be located over the western bank of the River Poddle and elevated above the river level. It will be supported by 13 piers that will be underpinned by a single bored pile in each case. A steel grid deck will allow rainwater to pass through to the riverbank below.

Extracts from drawing set 2. General Arrangements, which are provided as an appendix to Chapter 4 in Volume 3 of the EIAR, are included below in Figure 2-1-1 to 2-1-6.

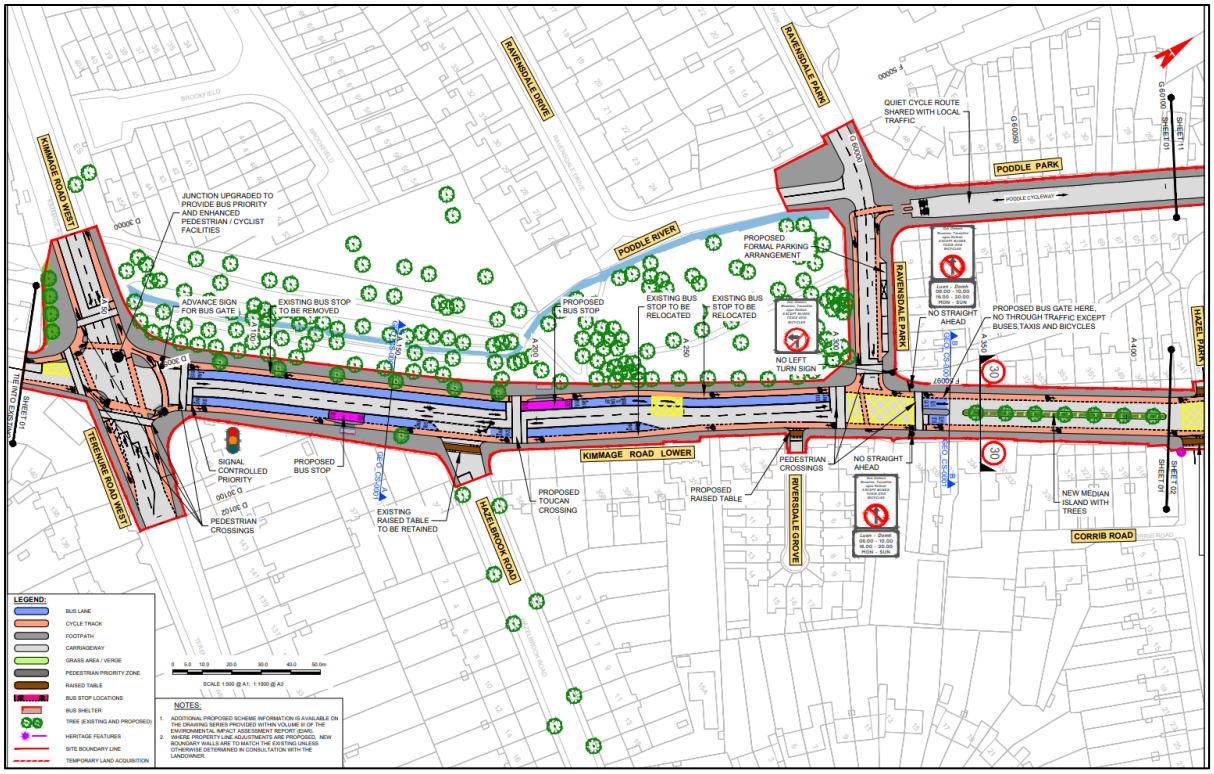


Figure 2-1-1: Extract from General Arrangement Drawings (Sheet 1)

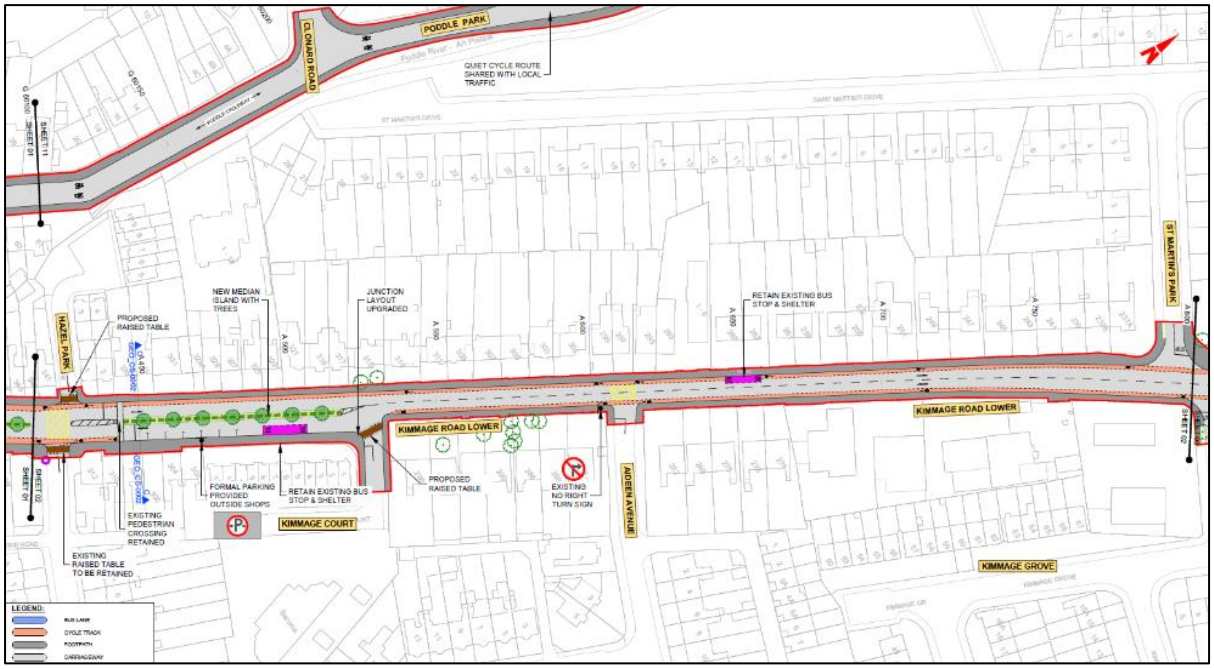


Figure 2-1-2: Extract from General Arrangement Drawings (Sheet 2)

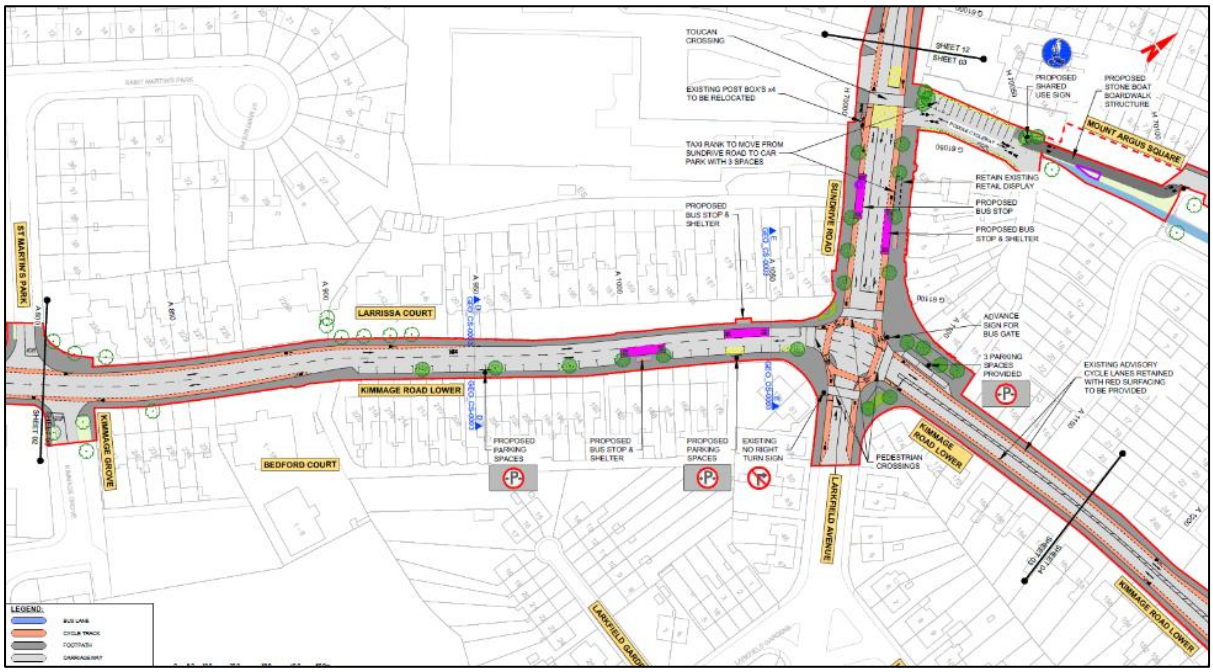


Figure 2-1-3: Extract from General Arrangement Drawings (Sheet 3)

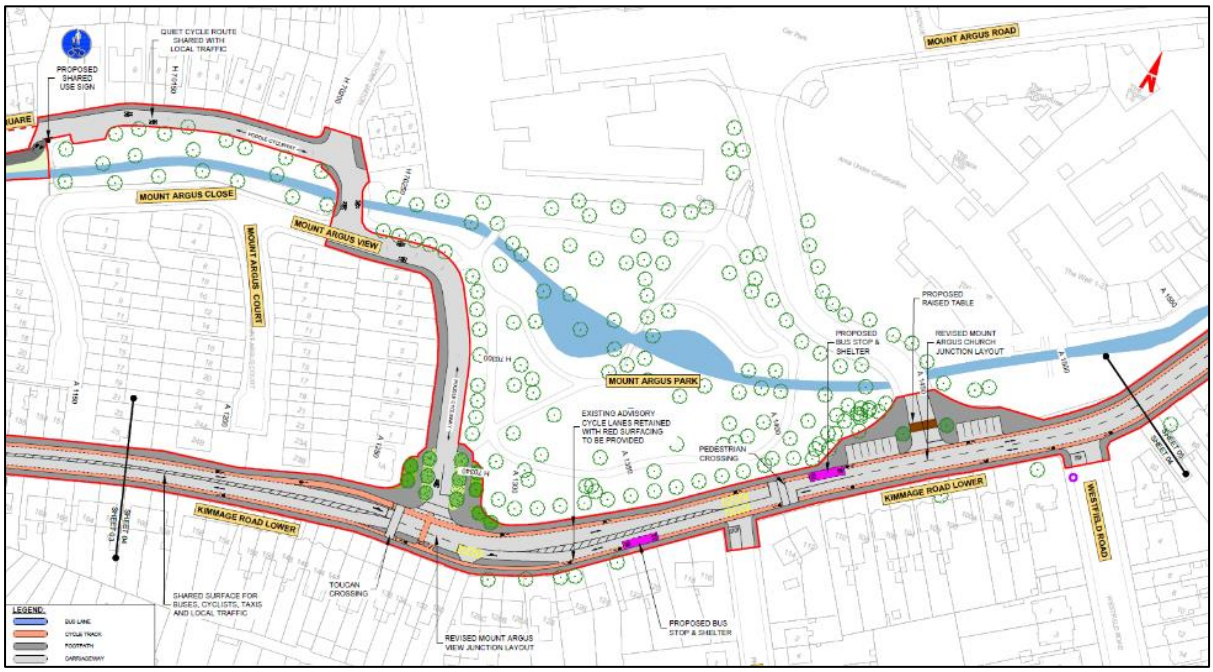


Figure 2-1-4: Extract from General Arrangement Drawings (Sheet 4)

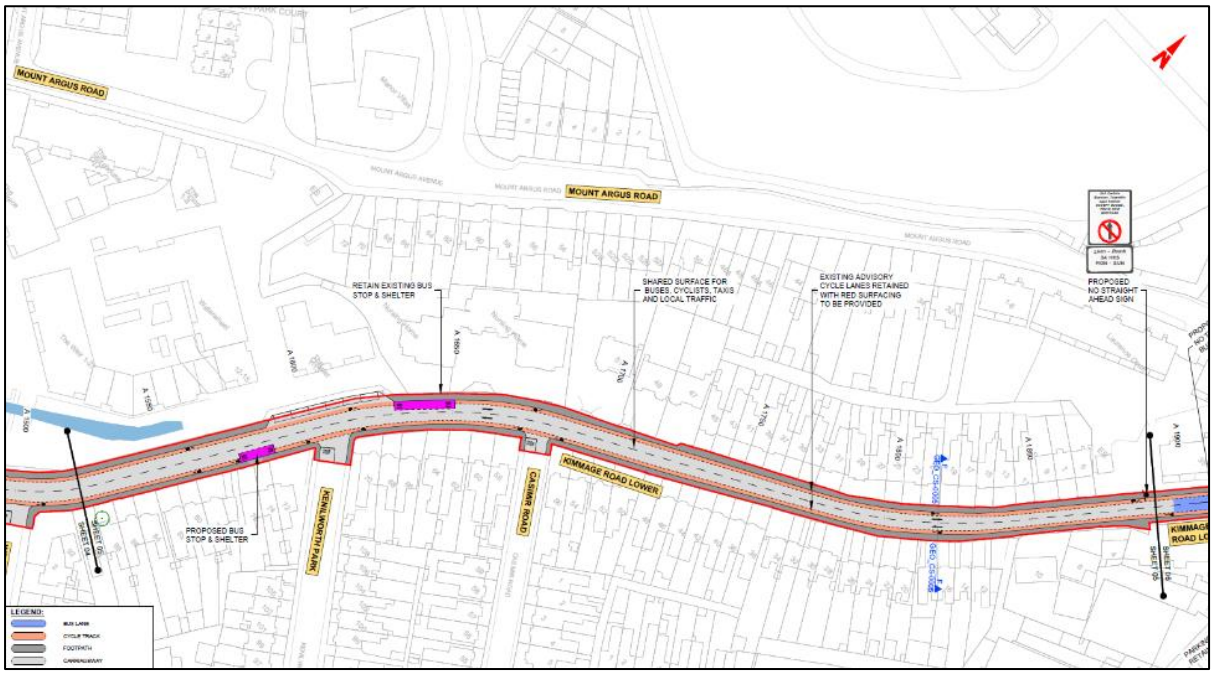


Figure 2-1-5: Extract from General Arrangement Drawings (Sheet 5)

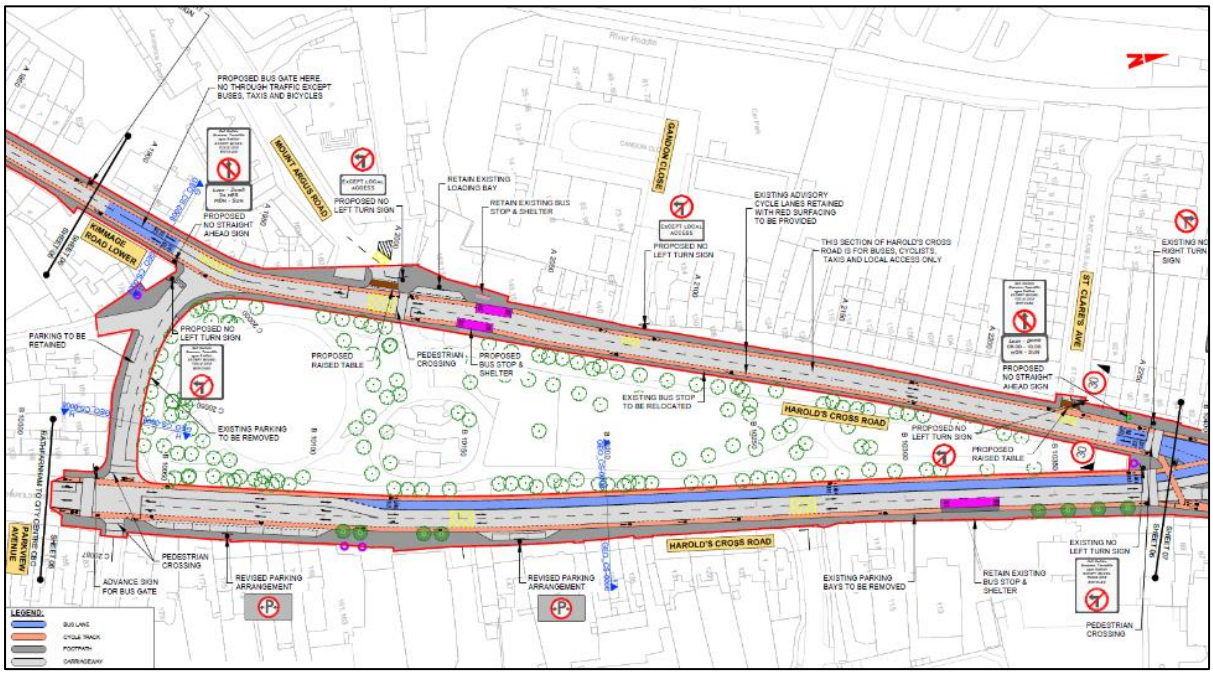


Figure 2-1-6: Extract from General Arrangement Drawings (Sheet 6)

2.1.2 Overview of Submissions Received

Table 2.1.1: Submissions Made in Respect of Section 1: Lower Kimmage Road from Kimmage Crossroads to Junction with Harold's Cross Road

No	Name	No	Name	No	Name
1	Ann O'Connell	32	Harolds Cross Tidy Towns Committee	61	Paul Cashman
2	Anna Rackard	33	Hugh Kearns	63	Peter Drennan
4	Brendan Heneghan	34	Hugh Raftery	64	Recorders Residents Association
5	Caitriona Dempsey	35	Irene Lewis & Eoin Lewis	66	Ruth Glennon and Others
8	Ciarán Coffey	37	Ivana Bacik	67	Saint Martin's Residence Association
9	Cllr Anne Feeney	38	James Purcell	68	Sharon Sabin & Bruno Rodrigues de Oliveira
10	Cllr. Carolyn Moore c-o Richard O'Carroll Room	39	Jeff Kelly	70	Siobhan Mc Clean
11	Cllr. Pat Dunne & Joan Collins TD and Others	40	Jim O'Brien	72	St. Annes Residents Association c-o Aidan Hodson
12	Cllr. Punam Rane	41	Kenilworth Park Residents' Association	73	Stannaway Road Residents C-O Cathy Mooney
13	Colin Price	42	Larkfield FC	74	Terenure Templeogue Sustainable Community
14	Cornelia Raftery	43	Larkfield Residents Association	75	Terenure West Residents Association
15	Corrib Road Residents	45	Liam Smyth	76	Tesco Ireland
18	Deirdre Pender	46	Linda Patton	77	The Estate of Joy Ordman c-o Shoshana Khan & Semone Eppel
19	Development Application Unit	48	Lower Kimmage Road Residents' Association (LOKRA)	78	The General Cemetery Company of Dublin
20	Dr. Nichola Walsh & Mr. Kealan McGuinness	49	Margaret Mc Entegart	79	The Harold's Cross Village Community Council c-o Dr. Paula Russell
21	Dublin City Council	51	Senator Mary Seery Kearney	80	The Passionist Community
22	Dublin Commuter Coalition	53	Metro South West Group	82	Thom's Pharmacy and Opticians C-O Fergal O'Dwyer
23	Dublin Cycling Campaign	54	Michael McMahon & Nathalie Peret	83	TII
24	Eilish Kenna	55	Michael O'Donoghue	84	Yvonne Mc Kenna
25	Elisha O'Brien	56	Mount Argus and Church Park Residents		
26	Eoin Duggan	58	Orwell Park (Templeogue) Residents Association		

2.2 Section 2: Harold's Cross Road from Harold's Cross Park to Grand Canal

2.2.1 Description of Proposed Scheme at this Location

The Proposed Scheme along this section of the corridor, is described in Section 4.5.2 of Chapter 4 of Volume 2 of the EIAR, Proposed Scheme Description:

This section of the Proposed Scheme will commence at the junction of R817 Kimmage Road Lower and R137 Harold's Cross Road at the northern end of Harold's Cross Park and will proceed north for a distance of 400m, to the Grand Canal at Robert Emmet Bridge.

Priority for buses will be provided along the entire length of this section of the Proposed Scheme, with retention and minor extension of the existing dedicated bus lanes along R137 Harold's Cross Road. In the northbound direction, the existing bus lane will be extended by 60m to the stop line at the junction with R111 Parnell Road at the northern end. Left-turning general traffic will not be permitted in the bus lane, and there will be a separate signal stage for the bus only before the general traffic lane green signal. This will avoid any conflicts between left-turning traffic from the right-hand lane that will cross in front of the bus lane. To accommodate this revised signal control arrangement, the existing right-turn movement into R111 Grove Road will be prohibited and all general traffic will use the right-hand lane only. The number of right-turning vehicles is low, and these can instead turn right at Leonard's Corner into R811 South Circular Road, 300m further north. It is likely that traffic from the Kimmage direction and further south will change route away from R817 Kimmage Road Lower due to the proposed Bus Gates and may instead join the orbital route along the Grand Canal further west at Clogher Road.

In the southbound direction, the existing bus lane will be extended by 35m at the northern end, and by 95m at the southern end so that there will be a continuous bus lane over the full 400m length.

New segregated 1.5m wide cycle tracks will be provided in both directions along R137 Harold's Cross Road. Wider 2m cycle tracks are not feasible in the constrained context of the street as described below.

Between Harold's Cross Park and the entrance to Our Lady's Hospice (a distance of 85m) there is on-street parking in indented bays with 10 spaces on the western side in front of No. 66 to 84 Harold's Cross Road, and seven spaces on the eastern side in front of No.75 to 85 Harold's Cross Road. The existing 10 parking spaces on the western side of the street will be removed to accommodate the proposed northbound cycle track. The existing seven parking spaces on the eastern side of the street will be retained. To compensate for the loss of the 10 on-street parking spaces, it is proposed to provide a new public car park with 22 spaces on the grounds of Our Lady's Hospice where there is a lawn area just inside the entrance. There will be a net additional 12 parking spaces available in this car park for the other residents along R137 Harold's Cross Road where there is a general shortage of parking in the local area.

To accommodate the proposed cycle tracks, road widening will be required of typically 2m over a length of 120m from the entrance to Our Lady's Hospice on the western side to the junction of Mount Drummond Avenue on the eastern side. There is a pinch-point between the hospice entrance and the gate of St. Clare's School on the opposite eastern side, where the distance between buildings is just 19m, and the public road width is 17.2m wide at the narrowest point. The proposed road cross-section will be 18m wide to include two 3m bus lanes, two 3m traffic lanes, two 2m footpaths and two 1.5m cycle tracks. Widening of approximately 0.8m will be required on the eastern side to achieve the 18m width. This will involve encroachment into a garden area at the front of a sheltered housing development operated by Focus Ireland, that is 2.6m wide at that location. It will also be necessary to set back the most northerly of the four gate pillars at the entrance to Our Lady's Hospice, which will be re-erected with the existing cut granite stone materials.

The proposed road widening will be on the eastern side of the street, north of St. Clare's School, with encroachment into the front gardens of 15 houses at No. 33 to 61 Harold's Cross Road and at the entrance to St. Clare's School. These houses are arranged in three terraces of four houses at each end, and a middle terrace of six houses, with the fifteenth property on the corner of Mount Drummond Avenue. The front gardens of the northern and southern terraces of houses are 5.5m long, and these will be reduced by the proposed 2m road widening to 3.5m long. The houses are set at a higher level at about 0.6m above the street level with a short set of steps on the path to the front door. There are no driveways, and residents with cars park on side streets nearby. Accommodation works will be required in the gardens behind the new boundary wall to provide replacement steps or ramps.

There is no on-street parking along this section of R137 Harold's Cross Road, north of Our Lady's Hospice, and this gives rise to difficulties for the residents to receive deliveries or for loading and unloading activities. To address this problem, it is proposed to provide an indented parking bay with four spaces in front of the middle terrace of houses at No. 43 to 53 Harold's Cross Road, which is setback from the adjoining terraces by an additional 3.5m, with 9m long front gardens. The parking bay will encroach by a further 2.5m into these gardens, which will be shortened by 4.5m to 4.5m long.

Four small street trees will be removed in the road widening on the eastern side and these will be replaced by a larger number of new trees at the proposed parking bay, and at the junction of Mount Drummond Avenue which will be narrowed at the corners to provide a shorter crossing for pedestrians, where four new on-street parking spaces will be provided in a revised junction layout with R137 Harold's Cross Road.

North of Mount Drummond Avenue, the existing road is wider at typically 20m wide between boundaries, which can accommodate the proposed 18m wide cross-section, with wider footpaths of up to 3m. This additional space will enable Island Bus Stops to be provided.

The street width reduces to 18m at the junction of Armstrong Street, 60m south of the junction with the R111 on Parnell Road and Grove Road at the Grand Canal. It narrows further to less than 18m over the final 20m to the corner of R111 Parnell Road, where road widening is proposed with encroachment into the garden space at the Fottrell House office building on the south-western side of the junction.

Extracts from drawing set 2. General Arrangements, which are provided as an appendix to Chapter 4 in Volume 3 of the EIAR, is included below in Figure 2-2-1 and 2-2.2.

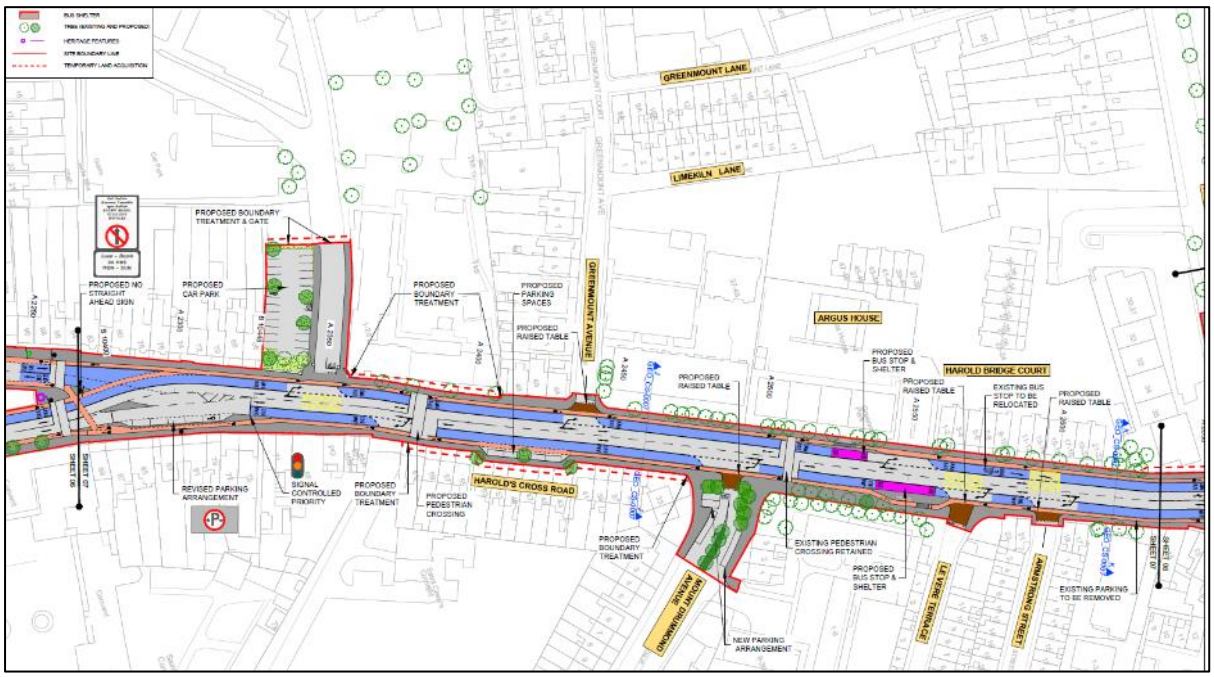


Figure 2-2-1: Extract from General Arrangement Drawings (Sheet 7)

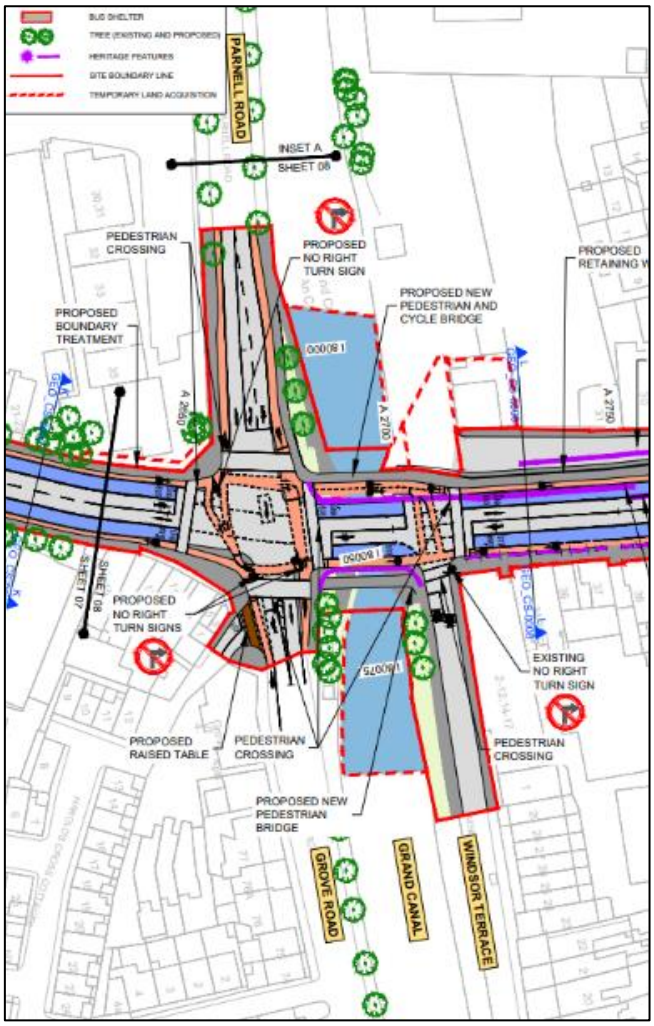


Figure 2-2-2: Extract from General Arrangement Drawings (Sheet 8)

2.2.2 Overview of Submissions Received

Table 2.2.2: Submissions Made in Respect of Section 2: Harold's Cross Road from Harold's Cross Park to Grand Canal

No.	Name	No.	Name	No.	Name
3	Anne O'Flaherty	32	Harolds Cross Tidy Towns Committee	64	Recorders Residents Association
7	Carol Michael	34	Hugh Raftery	65	Religious Sisters of Charity
9	Cllr Anne Feeney	36	Isabelle Walsh	69	Simeon Rimmer and Sheila Hourigan
10	Cllr. Carolyn Moore c-o Richard O'Carroll Room	37	Ivana Bacik	75	Terenure West Residents Association
18	Deirdre Pender	47	Lisa Harrington	76	Tesco Ireland
19	Development Application Unit	53	Metro South West Group	83	TII
21	Dublin City Council	57	Mount Drummond District Resident's Association (MDDRA)		
22	Dublin Commuter Coalition	59	Our Lady's Hospice and Care Services		
23	Dublin Cycling Campaign	62	Paul Ryan and Others		

2.3 Section 3: Clanbrassil Street Upper and Lower and New Street South from the Grand Canal to the Patrick Street Junction

2.3.1 Description of Proposed Scheme at this Location

The Proposed Scheme along this section of the corridor, is described in Section 4.5.2 of Chapter 4 of Volume 2 of the EIAR, Proposed Scheme Description:

Section 3 of the Proposed Scheme will be approximately 1km long and will commence at Robert Emmet Bridge over the Grand Canal on R137 Clanbrassil Street Upper and will proceed through to the Leonard's Corner Junction at R811 South Circular Road, and then along the R137 on Clanbrassil Street Lower and New Street South, until it reaches the junction with R110 Kevin Street Upper and R137 Patrick Street.

At Robert Emmet Bridge over the Grand Canal, two new cycle / pedestrian bridge structures are proposed on either side of the existing arch bridge to provide footpaths and the northbound cycle track outside of the narrow bridge width.

Priority for buses will be provided mainly with dedicated bus lanes for most of the length, apart from short sections where bus lanes cannot be accommodated within the narrow street and signal-controlled bus priority will be provided at the key junction of Leonard's Corner on R811 South Circular Road.

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

In this section, three new proposed structures are proposed to accommodate the proposed scheme. This is set out in in Chapter 4 of the EIAR, Section 4.5.3.8 Structures. The three structures in this section are described in the table below.

Table 2.3.1 – Proposed Bridge Structures in Section 3 (Table 4.20 Chapter 4 EIAR)

Identity	Chainage	Description
Kimmage 01A - Grand Canal Cycle / Pedestrian Bridge 1 - West	A-2690	A three-span 23.5m long x 6m wide steel bridge adjacent to Robert Emmet Bridge on the western side.
Kimmage 01B - Grand Canal Pedestrian Bridge 2 - East	A-2690	A three-span 24.5m long x 3.5m wide steel bridge adjacent to Robert Emmet Bridge on the eastern side.
Kimmage 04 – Windsor Terrace Ramp	A-2690	Extended ramp from Clanbrassil Street Upper along southern side of Windsor Terrace for improved footpath link: 2m wide x 20m long steel cantilever with reinforced earth sub-structure at the eastern end.

Extracts from drawing set 2. General Arrangements, which are provided as an appendix to Chapter 4 in Volume 3 of the EIAR, are included below in Figure 2-3-1 to 2-3-3.

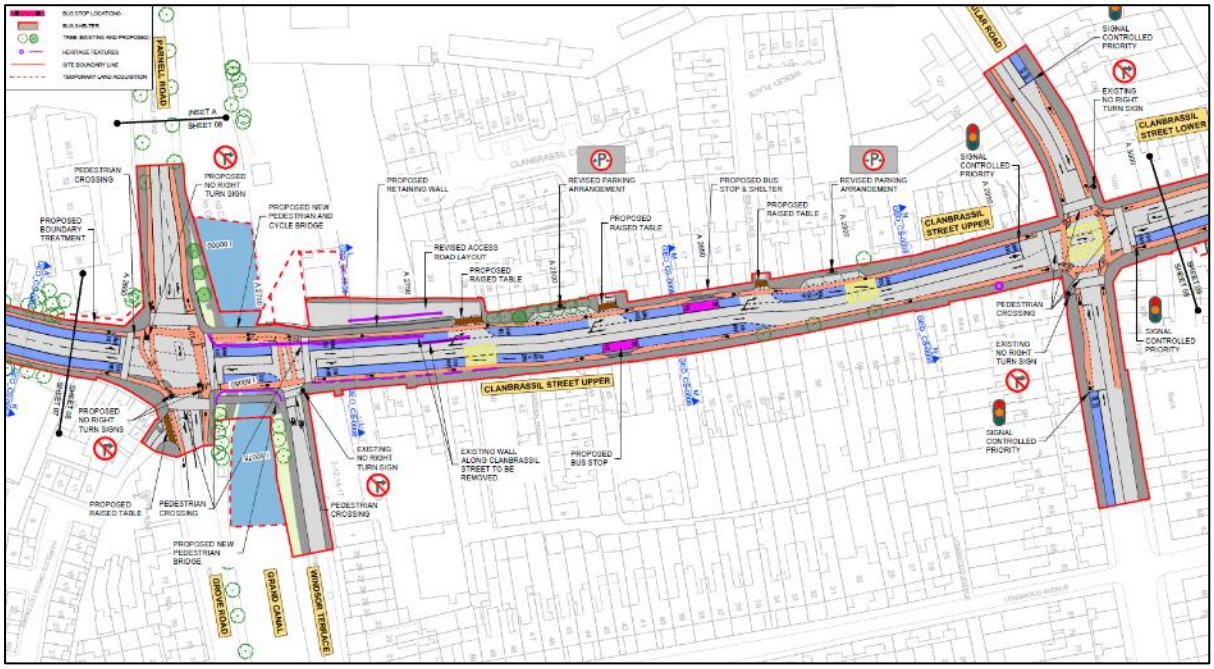


Figure 2-3-1: Extract from General Arrangement Drawings (Sheet 8)

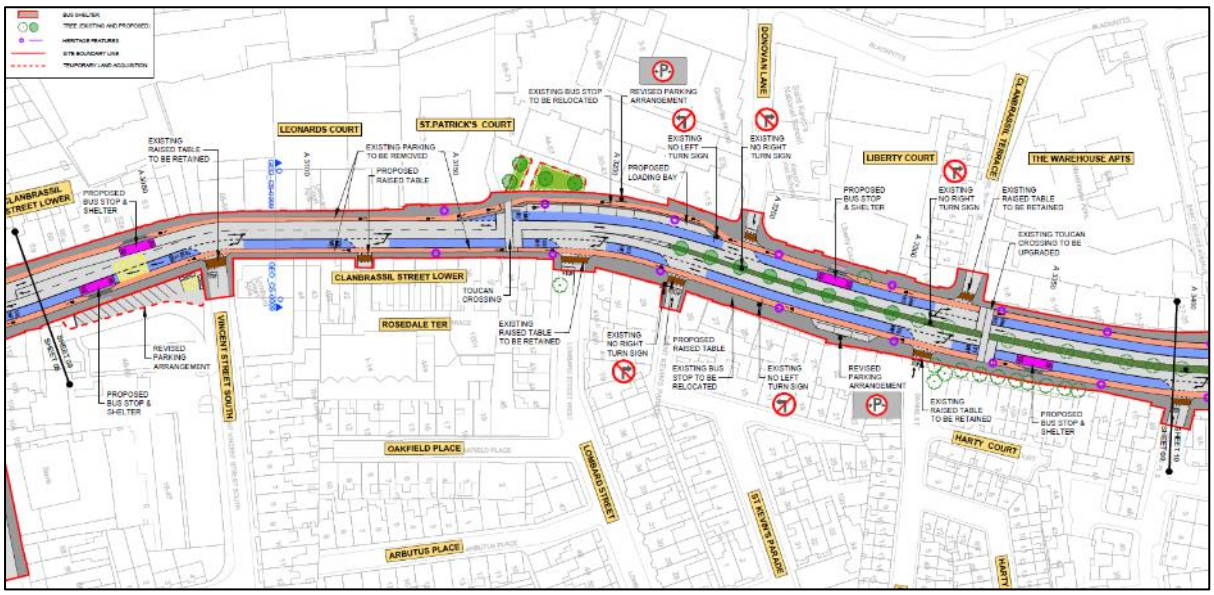


Figure 2-3-2: Extract from General Arrangement Drawings (Sheet 9)

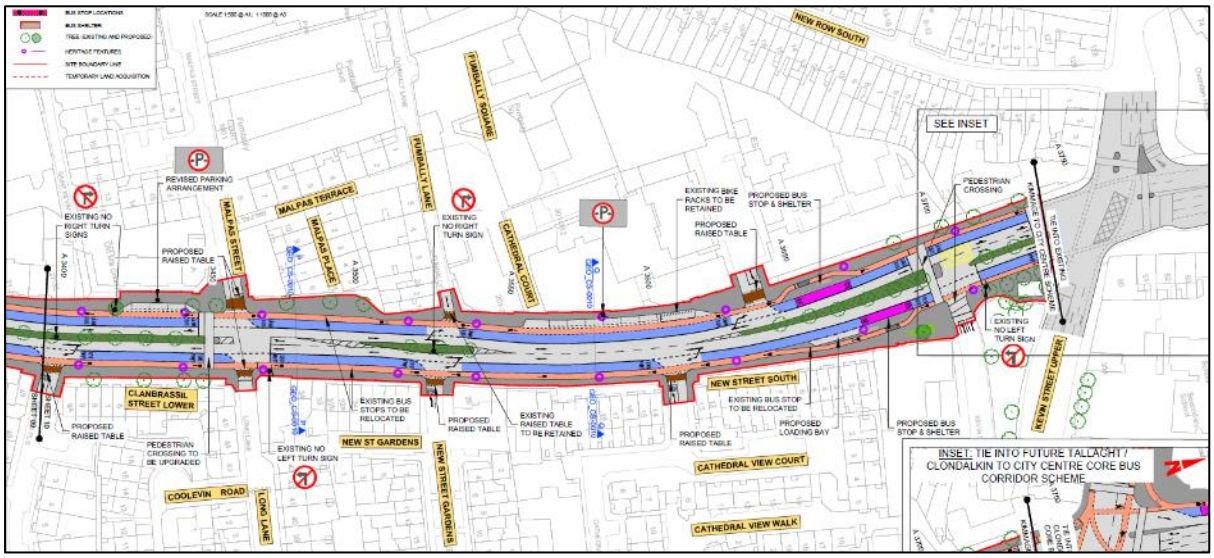


Figure 2-3-3: Extract from General Arrangement Drawings (Sheet 10)

2.3.2 Overview of Submissions Received

Table 2.3.2: Submissions Made in Respect of Section 3: Clanbrassil Street Upper and Lower and New Street South from the Grand Canal to the Patrick Street Junction

No	Name	No	Name	No	Name
6	Capital Glass Company Ltd	27	Estrella Vaquero	50	Martin Kelly
10	Cllr. Carolyn Moore c-o Richard O'Carroll Room	28	Gailot et Gray c-o Emma Gray & Gillies Gailot	52	Melanie Pine & Others
16	Daniel Martin	29	Gerard & Michelle Madden	53	Metro South West Group
17	Dawnlane Limited	30	Gill Ventures Ltd - Halal Food and Grocery	64	Recorders Residents Association
19	Development Application Unit	31	Gordon's Fuels	71	South Dublin Electrical Wholesale Ltd
21	Dublin City Council	34	Hugh Raftery	75	Terenure West Residents Association
22	Dublin Commuter Coalition	37	Ivana Bacik	81	The Wine Pair
23	Dublin Cycling Campaign	44	Legal Representatives of the Estate of Agnes Cassidy	83	TII

2.4 Whole Scheme Submissions

2.4.1 Overall Scheme Issues

Summary of issue raised:

1) No Strategic Environmental Assessment for the overall BusConnects Programme.
2) Limited proposals for landscaping and biodiversity are welcome but should be more extensive.
3) Provision of new car parking is contrary to DCC and national planning policies by encouraging car use.
4) Roads too narrow to fit layout and no dimensions on maps.

Responses to issues raised:

1) No Strategic Environmental Assessment for the overall BusConnects Programme.

As is described in EIAR Chapter 2 Need for The Proposed Scheme, the BusConnects Programme is part of the range of proposed improvements for the public transport system that was adopted under the Greater Dublin Area Transport Strategy (2016-2035 & 2022–2042).

As set out in Section 2.2.1.2 of Chapter 2, Strategic Environmental Assessments (SEA), were undertaken for both GDA Transport Strategies:

> *"A Strategic Environmental Assessment (SEA) was undertaken on the Transport Strategy for the Greater Dublin Area 2016 – 2035 (NTA 2016b). A number of alternative strategies were determined and assessed, taking into account the objectives and the geographical scope of the strategy. The provisions of the Transport Strategy for the Greater Dublin Area 2016 – 2035 (including bus-based transport modes), were evaluated for potential significant effects, and measures integrated into the Transport Strategy for the Greater Dublin Area 2016 – 2035 on foot of SEA recommendations in order to ensure that potential adverse effects were mitigated. In considering the alternative modes on a corridor basis, the environmental assessment undertaken considered that bus-based projects could contribute towards facilitating the achievement of Ireland's greenhouse gas emission targets in terms of reducing emissions per passenger per kilometre travelled. An SEA was also undertaken for the new Greater Dublin Area Transport Strategy 2022 – 2042 (NTA 2022b)."*

In the event that there is any suggestion that this Scheme, namely the Kimmage to City Centre Core Bus Corridor Scheme, itself should have been the subject of an SEA, that is not correct. A plan or programme is required to be the subject of a SEA under the provisions of the SEA Directive7 whereas a project is required to be the subject of EIA under the EIA Directive. Any of the individual stand-alone Core Bus Corridor Schemes is not a plan or programme within the meaning of the SEA Directive, requiring the carrying out of a SEA.

2) Limited proposals for landscaping and biodiversity are welcome but should be more extensive.

The Proposed Scheme has been developed carefully to integrate with the existing landscaping and park areas along the corridor. Where there is scope within the constraints of the existing urban context, the Proposed Scheme incorporates significant new landscaping consisting of additional street trees at many locations, including a tree lined median island over a length of 170m on Kimmage Road Lower in the Corrib Road area, urban realm improvements along 300m length of streets in Kimmage Village, and various other pockets of new planting and trees at intervals along the route. In this respect the Proposed Scheme has maximised the potential for further greening of this urban corridor which will enhance the biodiversity of the general area.

3) Provision of new car parking is contrary to DCC and national planning policies by encouraging car use.

4) There will be a slight reduction in car parking in the overall scheme as is described in EIAR Volume 2, Chapter 6 Traffic & Transport, Tables 6-22, 6-27 and 6-32. In Section 1 the parking will reduce by 5% from 760 to 721 spaces; in Section 2 parking will increase by 15% from 78 to 90 spaces; and in Section 3 parking will reduce by 9.5% from 199 to 180 spaces. Overall the parking along the whole of the Proposed Scheme will reduce by 4.4% from 1,037 spaces, with a net reduction of 46

spaces. The reductions in parking occur in the Sections with the greatest number of spaces, and are proportionally modest, while in Section 2 which has the least amount of parking and a general shortage in an area where very few houses have driveways, a small increase is proposed so as to diminish the risk of irregular parking on the proposed cycle tracks. The overall significance of effect is assessed as Negative, Slight and Long-Term in each of the three sections. It cannot be reasonably considered that the Proposed Scheme is contrary to DCC and national planning policies by encouraging car use in respect of the impact for parking which will actually be reduced slightly, while the key outcomes of the Proposed Scheme will be to provide significant improvements for public transport and cycling infrastructure.

5) Roads too narrow to fit layout and no dimensions on maps.

The narrowness of Kimmage Road Lower in particular is a key feature of the Proposed Scheme, which is why bus priority is proposed to be provided by bus gates rather than bus lanes over the southern 2km length of the corridor. In EIAR Chapter 3 Alternatives and Chapter 4 Description of the Proposed Scheme it is explained for each section the choices that were necessary to fit the proposed street layout within the constraints of the existing road widths. In some respects it was necessary to reduce the widths of some elements of the road cross-section to fit in the limited space available. An example is for the cycle tracks along Harold's Cross Road and part of Clanbrassil Street Lower which will be 1.5m wide rather than the desirable 2m width.

Dimensions of the proposed road layout could not be shown on the General Arrangement Drawings (EIAR Volume 3 Figures, Part 2) as this was impractical. Typical cross sections with dimensions are provided in EIAR Volume 3 Figures, Part 4, and detailed dimensions for both the existing road layout and the proposed layout are tabulated in the Supplementary Information, Preliminary Design Report, Table 4-2, which extends over 7 pages.

2.4.2 Consultation Process

Summary of issue raised:

1) Public Consultation Process in General
2) No letter to residents as "impacted properties" beside proposed road closures.
3) Procedural issues with Site Notices.
4) NTA funded professional advice for other communities on other schemes?
5) Monitoring of scheme in operation and ongoing community engagement.

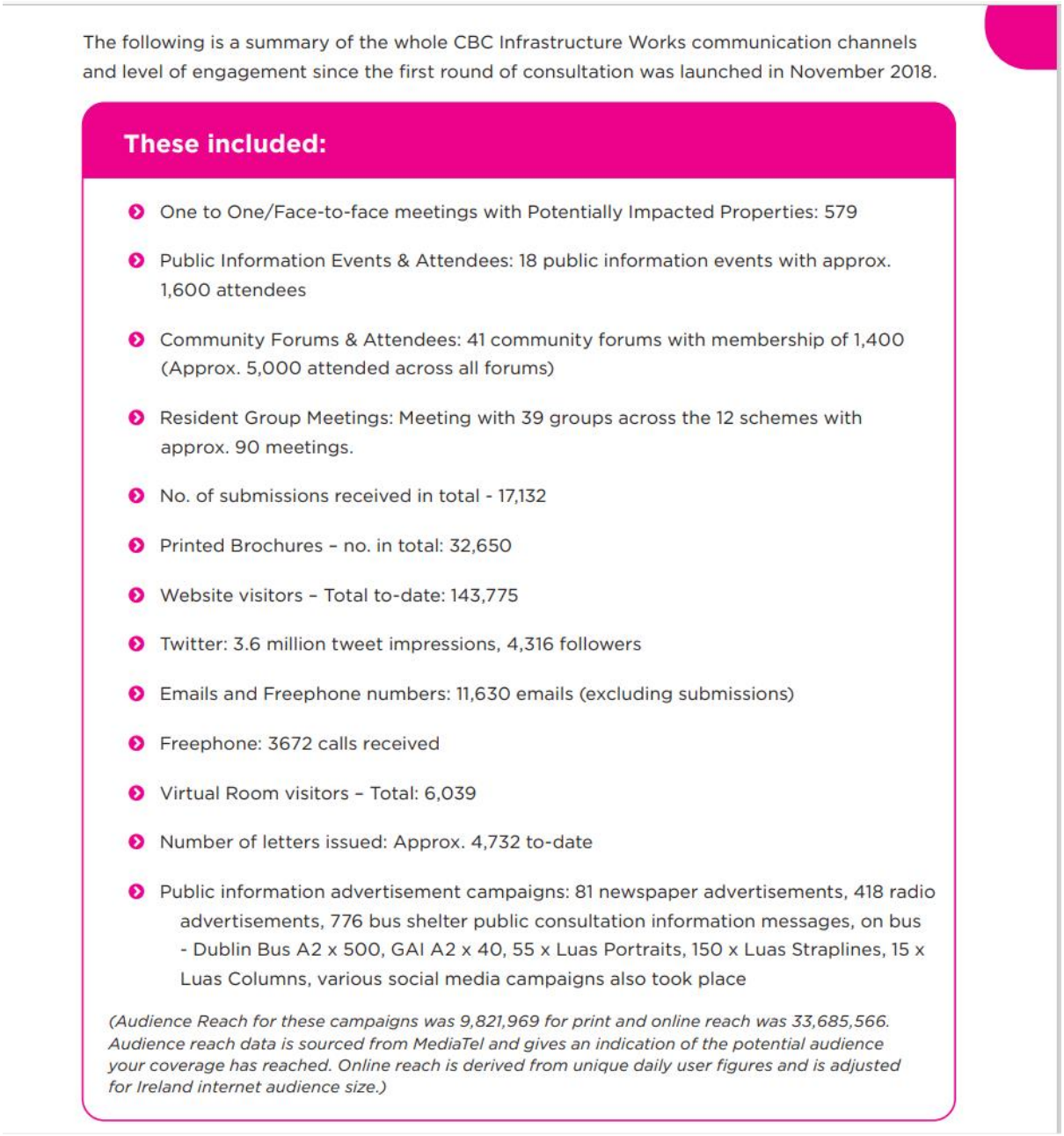
Responses to issues raised:

1) Public Consultation Process in General

A number of submissions noted that they felt excluded from the consultation process and queried if there has been compliance with the Aarhus Convention due to Covid lock down, residents' unfamiliarity with IT, lack of information books at public meetings. Submissions stated that the consultation process was inadequate and that the entire process took place online therefore disenfranchising people who do not have access to the internet. Some submissions stated that their voice was not listened to, and they see little changes in their area from what was originally presented to them.

The BusConnects Programme that is being managed by the National Transport Authority has been the subject of a very extensive public consultation process since it was first launched in November 2018.

In the Supplementary Information there is a comprehensive Public Consultation Report (extending to 570 pages) which describes the very extensive public consultation processes undertaken for BusConnects across all elements, including the Bus Network Redesign, the Bus & Cycle Lane Infrastructure Works consisting of 12 Core Bus Corridor Schemes, of which the Proposed Scheme is one element, and all the other strands for new bus fleet, ticketing system, bus stops and shelters and Park + Ride facilities. On Page 14 of that report there is a summary of all of the public consultation engagements that took place over the 4-year period of 2018 to 2022 (as reproduced in the following graphic), in advance of the submission of the Proposed Scheme to An Bord Pleanála for planning consent in July 2023. This summary illustrates the many channels of communication that were deployed, and which resulted in a high-level of public engagement.



The following is a summary of the whole CBC Infrastructure Works communication channels and level of engagement since the first round of consultation was launched in November 2018.

These included:

- One to One/Face-to-face meetings with Potentially Impacted Properties: 579
- Public Information Events & Attendees: 18 public information events with approx. 1,600 attendees
- Community Forums & Attendees: 41 community forums with membership of 1,400 (Approx. 5,000 attended across all forums)
- Resident Group Meetings: Meeting with 39 groups across the 12 schemes with approx. 90 meetings.
- No. of submissions received in total - 17,132
- Printed Brochures – no. in total: 32,650
- Website visitors – Total to-date: 143,775
- Twitter: 3.6 million tweet impressions, 4,316 followers
- Emails and Freephone numbers: 11,630 emails (excluding submissions)
- Freephone: 3672 calls received
- Virtual Room visitors – Total: 6,039
- Number of letters issued: Approx. 4,732 to-date
- Public information advertisement campaigns: 81 newspaper advertisements, 418 radio advertisements, 776 bus shelter public consultation information messages, on bus - Dublin Bus A2 x 500, GAI A2 x 40, 55 x Luas Portraits, 150 x Luas Straplines, 15 x Luas Columns, various social media campaigns also took place

(Audience Reach for these campaigns was 9,821,969 for print and online reach was 33,685,566. Audience reach data is sourced from MediaTel and gives an indication of the potential audience your coverage has reached. Online reach is derived from unique daily user figures and is adjusted for Ireland internet audience size.)

EIAR Volume 2, Chapter 1 Introduction, Section 1.6 summarises the public consultation process for the Proposed Scheme which commenced in February 2019 with the first of 3 non-statutory Public Consultation. Details of the Information Brochures that were provided at each of these consultations are provided in Appendix B and C of the *Preferred Route Option Report* (PRO) in the Supplementary Information. Summary reports for the 3 non-statutory public consultations are provided in Appendix F, G and H of the PRO Report.

As noted in section 1.6.1 Consultation of Chapter 1 of the EIAR:

> *Public participation has been an integral part of the iterative development of the Proposed Scheme from the outset. Pre-application public consultation was carried out in three phases (one in relation to Emerging Preferred Route (EPR) consultation and two in relation to the Preferred Route Option (PRO) consultation), to inform the public and stakeholders of the development of the Proposed Scheme from an early stage and to seek feedback and participation throughout its development. The BusConnects Infrastructure team has undertaken a comprehensive consultation and engagement process with stakeholders, landowners and members of the public throughout the development of the Proposed Scheme.*
>
> *The primary objective of the non-statutory public consultation process was and is to provide opportunities for members of the public and interested stakeholders to contribute to the planning and design of the Proposed Scheme and to inform the development process. Public participation*

in the planning and design of the Proposed Scheme was encouraged from an early stage through on-the-ground engagement and information and media campaigns.

The early involvement of the public and stakeholders ensured the views of various groups, individuals and stakeholders were taken into consideration throughout the development of the Proposed Scheme and in the preparation of this EIAR.

The non-statutory consultation process assisted in:

- *The establishment of a sufficiently robust environmental baseline for the Proposed Scheme and its surroundings;*
- *The identification, early in the process, of specific concerns and issues relating to the Proposed Scheme so that they could be appropriately accounted for in the design and assessment scope; and*
- *Ensuring the appropriate involvement of the public and stakeholders in the assessment and design process.*

The consultation process involved engagement from:

- *Emerging Preferred Route (EPR) Option Consultations; and*
- *Preferred Route Option (PRO) Consultations.*

More specific information relating to the pre-application phases of public consultation, issues which emerged and the manner in which they informed the iterative development of the Proposed Scheme are outlined in the sections which follow.

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

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

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

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

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

As part of the scheme development stage, various non-statutory public consultation processes have been undertaken. These processes are in excess of the requirements of the Aarhus Convention, whose obligations are already enshrined in Irish legislation including "statutory public consultations" which is the stage that the project has now reached.

The NTA notes the comment regarding the technical nature and volume of the documents presenting a potential barrier to the general public seeking access to information relating to the scheme. Given the nature of such infrastructure schemes as BusConnects Core Bus Corridors, there is invariably a substantial amount of technical information which needs to be provided, so as to ensure that the consent application is comprehensive in nature to meet legislative requirements and provide the competent authority with the necessary information to allow them to reach a decision. Volume 1 of the EIAR comprises the Non-Technical Summary of the EIAR for the Proposed Scheme. Chapter 1 in Volume 2 of the EIAR contains information on the content and structure of the EIAR. Section 1.5.6 of Chapter 1 sets out the information which must be contained in the EIAR. The NTA has sought to make the information as concise as possible, while ensuring that the necessary information has been provided. Section 1.5.7 of Chapter 1 sets out the structure of the EIAR. It is considered that the structure of the EIAR does provide the necessary legibility for those interested parties (both lay persons and technical specialists) to find the information of relevance to them. While the EIAR has been prepared in

compliance with the EIA Directive, it has also been written to make it accessible to a wider, non-specialist audience in so far as possible.

In relation to the effect of the Covid lock down it should be noted that every effort was made by the NTA to facilitate public participation and engagement during the Covid-19 pandemic.

Second Round of Non-Statutory Public Consultation – The non-statutory public consultation for the Preferred Route Options ran from March 2020 to April 2020 as Ireland entered the first lockdown due to the Covid-19 pandemic. The consultation continued in deference to the number of online submissions received during this period. A number of public-facing elements of the consultation were cancelled in line with Government health guidelines, however, all other elements of the consultation including online versions of the brochures, supporting documentation were available. Other communication tools including the Freephone, email and digital aspects remained active for submissions to be received.

Third Round of Non-Statutory Public Consultation – This round of non-statutory public consultation for the Preferred Route Options from November 2020 to December 2020 was added due to the disruption caused to the second-round consultation process. It was important that further engagement was facilitated to communicate design development changes prior to concluding the determination of the Preferred Route Options. Methods had emerged whereby traditional public information events could be replaced by virtual online alternatives to offset the restrictions that continued associated with the Covid-19 Pandemic. Accordingly, all elements of the public consultation and stakeholder engagement were conducted virtually or online in line with the Government health guidelines.

In terms of engagement with landowners of potentially impacted properties, Section 1.7.3 in Chapter 1 of the EIAR sets out the various direct communications over the course of the project:

> *Since the initiation of the pre-application public consultation process in February 2019 there has been ongoing engagement with landowners, and / or anyone with an interest in potentially impacted properties or lands along the corridor of the Proposed Scheme, as the design development has progressed.*
>
> *As set out in the Consultation Section (Section 1.6) during each round of public consultation those landowners identified as being either potentially impacted or no-longer potentially impacted were written to directly to receive information on the consultation in advance of any wider publication of the proposals. Oneto-one meetings were offered on a face-to-face basis pre-COVID, and via Zoom or over the phone since March 2020, for those who wished to discuss the proposals further in relation to their own property with the minutes being recorded as part of the consultation process. Over the three rounds of consultation, approximately 236 letters of this kind were issued.*
>
> *Throughout the planning process any requests for meetings, phone conversations, or other requests for information have been accommodated where possible. Many of the submissions received during consultations have included from those potentially impacted owners and as with all other submissions they have been considered in the design development.*
>
> *Most recently during May and June 2021, approximately 86 letters (registered) have been issued to properties likely to be the subject of the Proposed Scheme Compulsory Purchase Order (CPO) process seeking to engage with them to ascertain ownership details (or to confirm ownership details based on Property Registration Authority – Registry of Deeds referencing research), or to ascertain any others with an interest in the property/lands. Follow-up conversations have been facilitated as a result of these letters on request.*
>
> *Over the course of the engagements, affected property owners have had the opportunity to discuss, among other things, the following aspects with the BusConnects Infrastructure team:*
>
> - *Overall scheme proposals and potential impacts;*
> - *Timelines for the scheme design development and associated EIAR assessment;*
> - *Procedural matters such as planning and CPO process;*
> - *Specific details of impact of scheme on landowner property including approximate extent of encroachment; and*
> - *General information around reinstatement and accommodation works.*

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

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

Full details of the consultation undertake as part of the Proposed Scheme development is presented in the Public Consultation Report 2018 – 2022 provided as part of the Supplementary Information.

2) Notices for Impacted Properties

A submission was received from a resident affected indirectly by aspects of the Proposed Scheme who stated that they did not receive direct notification letters. (Scheme Submission No.63). Specifically the issue was raised in relation to the proposed closure of Poddle Park to general traffic at the southern end as submitted by a resident of a house nearby on that street.

As described in EIAR Volume 2, Chapter 1 Introduction, Section 1.7.3, notice letters were issued to the owners or occupiers of properties from which land was potentially proposed to be acquired in the Compulsory Purchase Order for the Proposed Scheme, as these properties would be directly affected. For other properties from which land would not be acquired, the owners were not sent notice letters as this could apply to all properties in a very wide urban area. Instead, the comprehensive public consultation process provided reasonable notice to the general public of the proposals which could affect them indirectly. Non-statutory Site Notices were erected at the location of each of the proposed restrictions of the public right-of-way, which included the junction at the southern end of Poddle Park with Ravensdale Park. These notices provided a further opportunity for the residents in the immediate vicinity to become aware of the specific proposals at that location. The receipt of the relevant submission No.63 is evidence that the Site Notice at Poddle Park was successful in alerting the local residents to the proposals at that location.

3) Procedural Issues with Site Notices.

Site Notices No.1 at Poddle Park and at No.2 Derravaragh Road that were initially installed on 27th of July 2023 contained incorrect maps. These errors were rectified with new Site Notices erected on 26th October 2023. The statutory public consultation period was extended to 8th of December to allow a full 7 weeks' period after the notices had been corrected. The overall total public consultation period for the Proposed Scheme therefore amounted to 4 months.

4) Funding of Professional Advice for Communities

It is not usual practice for a public body such as NTA to provide funding for professional advice to community groups engaged in consultation for a proposed public works scheme. In this regard it is likely that the relevant Scheme Submission No.4 (on page 8) is referring to arrangements for the Metrolink at Charlemont which includes a compensation scheme for buildings potentially impacted by underground tunnelling, which would not be relevant to this Proposed Scheme in BusConnects.

5) Monitoring of scheme in operation and ongoing community engagement

The submission by the Lower Kimmage Road Residents' Association requests:

> *"Monitoring should be continuous and reporting with opportunities for consultation (at least annually), transparent and consequential, with criteria to be mutually agreed under an independent Chair. This might be done across the breadth of Bus Connects as a substantial change for the city but should allow for nuanced decisions for each residential community."*

The EIAR for the Proposed Scheme includes provisions where appropriate for monitoring of the potential impacts of the works during construction.

Operational stage monitoring will be provided as part of the continuous management of the urban transport system across the Dublin area. There are existing arrangements and procedures that provide information about the operation of the transport system through both the National Transport Authority and the local authorities with information provided publicly on a regular basis. Briefings are provided for elected representatives at local and national level, which is the appropriate channel for communications with local communities. No further specific arrangements will be necessary in relation to BusConnects.

2.4.3 EIAR / NIS

Summary of issue raised:

1) EIAR Chapter 21 omits Eirgrid projects.
2) Failure to properly comply with the EIA Directive.
3) NIS is deficient.
4) Displaced traffic will increase air pollution.
5) Noise and Vibration impacts assessed at 5m from the road edge does not address houses closer than that (3.5m).
6) Construction compound K2 at Our Lady's Hospice: Inadequate assessment of impacts: access restriction beside construction compound, noise, and dust. Human Health & Population – risk of traffic delays for access to hospice.
7) Impacts for Biodiversity and Wildlife along River Poddle at Stone Boat.

Responses to issues raised:

1) <u>EIAR Chapter 21 omits Eirgrid projects.</u>

At time of the submission to An Bord Pleanála for this Proposed Scheme there were no confirmed proposals by Eirgrid for projects to strengthen the electricity grid in Dublin, albeit an initial public consultation process took place in early 2023 to inform the public that the "*Powering up Dublin"* project had commenced with a route selection process. One of the proposed routes will link grid infrastructure with two new 220KV underground cable circuits between Inchicore to the west and Poolbeg to the east, which would potentially cross the Kimmage to City Centre Core Bus Corridor Scheme at some point. In February 2024 Eirgrid undertook a further round of public consultation with emerging best route options for these links. Route Option J would extend along Sundrive Road and Larkfield Avenue to cross the Proposed Scheme at Kimmage Road Lower in Kimmage Village. Interactions between the Proposed Scheme and the Eirgrid project will potentially occur in the construction stages if the two schemes overlap in time. In that case NTA will coordinate any such works with Eirgrid to manage the potential construction impacts appropriately. Operational cumulative impacts will not arise between the two schemes as the Eirgrid cables will be located underground.

Section 5.9 in Chapter 5 in Volume 2 of the EIAR addresses the interface with other projects:

> *"….Interface liaison will take place on a case-by-case basis through the NTA, as will be set out in the Construction Contract, to ensure that there is coordination between projects, that construction access locations remain unobstructed by the Proposed Scheme works and that any additional construction traffic mitigation measures required to deal with cumulative impacts are managed appropriately."*

2) <u>Failure to properly comply with the EIA Directive.</u>

One submission says that the Proposed Scheme does not provide an EIAR that properly complies with the EIA Directive. Section 1.5.1 in Chapter 1 in Volume 2 of the EIAR sets out the statutory requirements for the preparation of an EIA, while Section 1.5.2 sets out the relevant legislation, policy, and guidelines with which the EIA has been prepared in accordance with. It is pursuant to the provisions of the amended Roads Act and Roads Regulations 1994 that the EIAR for the Proposed Scheme has been prepared. Article 5 of and Annex IV to the EIA Directive and Section 50(2) of the Roads Act specify the information to be contained in an EIAR in relation to this Proposed Scheme. Tables 1.1 and 1.2 in Section 1.5.6 provides the relevant sections of legislation. The NTA consider that the EIAR has been prepared in accordance with the appropriate guidance and legislation and has assessed the likely

significant effects (including the direct, indirect, and cumulative effects) as a result of the construction and operation of the Proposed Scheme.

3) NIS is deficient.

The Natura Impact Statement for the Proposed Scheme was prepared in accordance with the provisions of Part XAB of the Planning and Development Act, 2000 (as amended) ("the 2000 Act") and in accordance with the requirements of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (the Habitats Directive). It considers the implications of the Proposed Scheme, on its own and in combination with other plans or projects, for European sites in view of the conservation objectives of those sites. It includes a scientific examination of evidence and data to identify and assess the implications of the Proposed Scheme for any European sites in view of the conservation objectives of those sites. The NIS considers whether the Proposed Scheme, by itself and in combination with other plans or projects (including other BusConnects schemes), would adversely affect the integrity of any European sites. In reaching a conclusion in this regard consideration is given to any mitigation measures necessary to avoid or reduce any potential negative impacts. The NIS has been prepared following an assessment of the potential for, in view of best scientific knowledge, the Proposed Scheme to have significant effects, either individually or in combination with other plans or projects on European sites, set out in an Appropriate Assessment (AA) Screening Report.

In addition, the NTA notes that the North-West Irish Sea candidate Special Protection Area (cSPA, site code 004236) has recently been announced. Whilst it was announced after submission of the current planning application, it nonetheless adjoins existing SPAs from along the eastern seaboard, the majority of which e.g. South Dublin Bay and River Tolka Estuary SPA, North Bull Island SPA, Baldoyle Bay SPA, Howth Head Coast SPA, Ireland's Eye SPA, Malahide Estuary SPA, Rogerstown Estuary SPA, Lambay Island SPA, Skerries Islands SPA, Rockabill SPA are included within the assessment for the Proposed Scheme. While the bulk of the listed SCIs for the cSPA are largely coastal, a number can venture inland. However, their inclusion as part of the Appropriate Assessment would not alter the outcome of the assessment presented in respect of the Proposed Scheme, as the SCI's and potential impacts from within the vicinity of the Proposed Scheme have effectively been captured in the NIS submitted in support of the planning application.

4) Displaced traffic will increase air pollution.

EIAR Volume 2, Chapter 7 Air Quality assessed the likely impacts of the Proposed Scheme in relation to the expected changes to traffic distribution across the urban area along and adjoining the Proposed Scheme. This assessment included consideration of the displacement of traffic onto other roads as is described in EIAR Volume 2, Chapter 6 Traffic & Transport. The assessment included consideration of Rathgar Avenue where the peak traffic flow will increase by approximately 200 vehicles per hour (Tables 6-50 and 6-53). Section 7.6.2 in Chapter 7 in Volume 2 of the EIAR addresses the residual air quality impacts that are predicted as a result of the operation of the Proposed Scheme;

> *"The air dispersion modelling assessment has found that the majority of all modelled receptors are predicted to experience negligible impacts due to the Proposed Scheme, and beneficial impacts are also estimated along the length of the Proposed Scheme. There are no substantial or moderate adverse effects expected as a result of the Operational Phase of the Proposed Scheme. In 2028, all receptors will have ambient air quality in compliance with the ambient air quality limit values for the DS scenario. In 2043, all receptors are expected to have ambient air quality in compliance with the ambient air quality standards for the DM and the DS scenarios. Overall, it is considered that the residual effects as a result of the Proposed Scheme's operation will be Neutral and Long-Term."*

Traffic related cumulative effects were also considered in Chapter 21 in Volume 2 of the EIAR. Section 21.3.2.1.2 states the following:

"…..When the schemes are operational (as well as all other proposed Core Bus Corridor schemes), this has the effect of constraining the opportunity for traffic to displace onto adjoining / adjacent roads when compared to the effect when only one of the Core Bus Corridor schemes is operational. In addition to this, with all the Core Bus Corridor schemes operational, there is predicted to be a higher modal shift from private car trips to sustainable modes of travel compared to the singular scheme scenario. This is due to the combined effect of all Core Bus Corridor schemes being operational and the journey time

savings and reliability for bus travel and the interchange opportunities that this provides to travel around Dublin in combination with the BusConnects network re-design proposals. In addition, the Core Bus Corridor schemes will facilitate a step change in the level of segregated cycling provision in comparison with existing conditions along the entire length of the corridors resulting in more people cycling. The result of the above is that the cumulative effect of all Core Bus Corridors in operation and in tandem with the roll out of the wider Greater Dublin Area Transport Strategy measures, future growth in overall travel demand is catered for by sustainable modes. No significant negative effects over and above those considered in the standalone assessments for the Operational Phase were predicted in the cumulative impact assessment and therefore no additional mitigation measures are considered necessary. "

With regard to the potential cumulative operational phase air quality impacts, these are summarised in Section 21.3.2.2.4 in Chapter 21 in Volume 2 of the EIAR:

> *"…. Therefore, it is considered that the residual effects during the cumulative Operational Phase of the Proposed Scheme and the other 11 Core Bus Corridor schemes are Neutral and Long-Term whilst meeting the scheme objectives set out in Chapter 1 (Introduction). No new additional potential Negative and Significant impacts have been identified over and above the standalone assessment for the Proposed Scheme (refer to Table 21.17) …."*

5) Noise and Vibration impacts assessment.

EIAR Volume 2, Chapter 9 Noise & Vibration assessed the likely impacts of the Proposed Scheme in relation to the expected changes to traffic distribution across the urban area along and adjoining the Proposed Scheme. This assessment included consideration of the displacement of traffic into other roads as is described in EIAR Volume 2, Chapter 6 Traffic & Transport. The assessment included consideration of Stannaway Road Avenue where the peak traffic flow will increase by approximately 260 vehicles per hour (Tables 6-50 and 6-53). This increase in traffic is insufficient to give rise to a perceptible impact for noise.

Section 9.6.2 in Chapter 9 in Volume 2 of the EIAR addresses the residual noise and vibration impacts that are predicted as a result of the operation of the Proposed Scheme. There are no no significant residual Operational Phase noise or vibration impacts predicted. associated with the Proposed Scheme. It states in Section 9.6.2 that:

> *"….During the Design Year (2043), increased traffic noise levels will occur along a small number of roads adjacent to the Proposed Scheme as a result of traffic re-distribution during daytime periods. During the long-term phase, noise impacts are calculated as Positive, Moderate and Long-Term impact to Negative, Not Significant to Slight and Long-Term impact along the surrounding road network off the Proposed Scheme…."*

As mentioned above, traffic related cumulative impacts are addressed in the Section 21.3.2.1.2 in Chapter 21 of Volume 2 of the EIAR.

With regard to the potential cumulative operational phase noise and vibration impacts, these are described in Section 21.3.2.4 in Chapter 21 in Volume 2 of the EIAR:

> *"……During the year of opening, under the cumulative traffic scenario, the same impacts are calculated along the roads impacted by the standalone scheme. There are thirteen roads which are determined to have an indirect, negative, moderate, short to medium term noise impact in accordance with the methodology outlined in Section 9.4.5.1 in Chapter 9 (Noise & Vibration) with all 12 Core Bus Corridor Schemes in place. One road is calculated to experience an indirect, Negative, Moderate to Significant, Short to Medium Term impact. The impacts are calculated at roads outside of the Proposed Scheme due to traffic redistribution. Environmental Impact Assessment Report (EIAR) Volume 2 of 4 Main Report Kimmage to City Centre Core Bus Corridor Scheme 54 During the future design year, 2043, the predicted cumulative noise impacts are lower that the opening year along the same roads due to the lower magnitude of impact assigned to changes in road traffic noise over time and lower traffic volumes across the network predicted into the future. The combined effect results in a similar magnitude of impact when compared to the standalone Proposed Scheme. Section 9.4.4.1.2.1 of Chapter 9 (Noise & Vibration) notes that traffic noise levels along the surrounding road network, will be lower than those assumed for the impact assessment due to lower noise emissions from the future fleet of electric vehicles along urban and suburban roads with lower speeds, particularly those along residential streets and*

roads. In reality, the impacts determined and presented for both years will be further reduced when the lower noise emissions associated with electric fleet along low speed roads are factored in."

6) Construction compound K2 at Our Lady's Hospice

The proposed construction compound K2 will be located on the un-used grass lawn area along the southern side of the access road into the hospice as described in EIAR Volume 2, Chapter 5, Section 5.7. An indicative layout of the compound is shown in Image 5.4 in EIAR Chapter 5, and this is reproduced in Figure 2-4-1 below. The compound will not impede access to the hospice which will continue along the existing access road beside the proposed compound. In addition, Section 5.2.3.15 in the Construction Environmental Management Plan (Appendix A5.1 in Volume 4 of the EIAR) states: *"…. Access will be maintained for emergency vehicles along the Proposed Scheme, throughout the Construction Phase"*

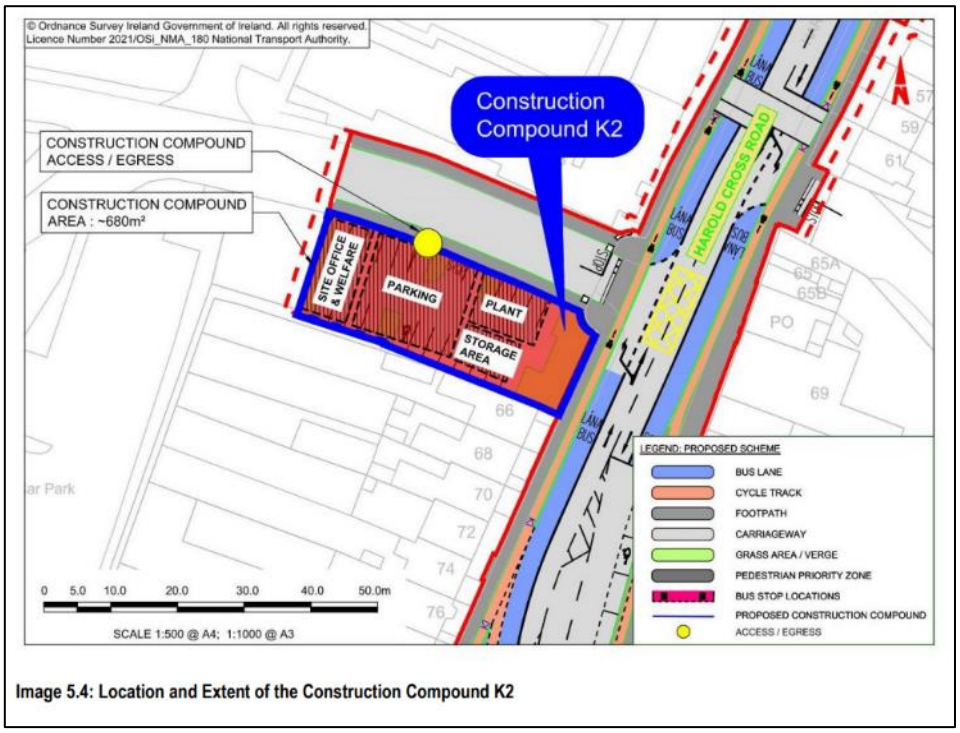


Figure 2-4-1: Construction Compound K2 at Our Lady's Hospice

EIAR Chapter 5, Section 5.7.2 sets out what will be contained in the Construction Compound:

"As shown in Image 5.3 to Image 5.5, the Construction Compounds will contain a site office and welfare facilities for NTA personnel and contractor personnel. Limited car parking will be allowed at the Construction Compounds, in line with the principles of the Construction Stage Mobility Management Plan (CSMMP), as described in Appendix A5.1 CEMP in Volume 4 of this EIAR, which will be prepared by the appointed contractor. Excavated materials such as topsoil, subsoil, concrete, rock etc., will not be stored at the Construction Compounds for reuse, as the compounds are too small. All excavated materials will be immediately loaded into lorries for removal from the site of the excavation. Items of plant and equipment, described in Section 5.6, will be stored within the Construction Compounds when not in use."

Assessment of air quality and noise and vibration impacts as a result of activities associated with the proposed construction compound are described in EIAR Volume 2 Chapter 7 (Air Quality) and Chapter 9 (Noise & Vibration) respectively.

a) In EIAR Chapter 7, Section 7.5.1.1 notes the mitigation measures to be implemented to mitigate potential air quality impacts (including construction dust):: "….*During movement of dust-generating materials both on and off-site, trucks will be covered with tarpaulin and before entrance onto public roads, trucks will be checked to ensure the tarpaulins are properly in place; and The appointed Contractor will provide a site hoarding of 2.4m height along noise*

sensitive boundaries, at a minimum, at the Construction Compounds which will assist in minimising the potential for dust impacts off-site….."

Section 7.5.1.1 goes on to say:

"The appointed Contractor will keep the effectiveness of the mitigation measures under review and revise them as necessary. In the event of dust nuisance occurring outside the works boundary associated with the Proposed Scheme, movements of materials likely to raise dust will be curtailed and satisfactory procedures implemented to rectify the problem."

Section 7.6.1 addresses residual air quality impacts and states:

""When the dust minimisation measures detailed in the mitigation section of this Chapter are implemented, fugitive emissions of dust from the site will be insignificant and pose no nuisance at nearby receptors. Thus, there will be no residual Construction Phase dust impacts…."

b) In EIAR Chapter 9 *Table 9.46: Summary of Predicted Construction Phase Impacts Following the Implementation of Mitigation and Monitoring Measures* assessed the noise impacts at the proposed construction compounds as follows: "*Negative, Slight to Moderate and Temporary at NSLs* (Noise Sensitive Locations) *within 10m of the Construction Compound boundaries; and Negative, Not Significant and Temporary at all other distances"*.

It is also important to note that the appointed contractor will be required to implement a Construction Environmental Management Plan (CEMP). Section 5.10.1 of Chapter 5 states:

"As stated in Section 5.1, a CEMP has been prepared for the Proposed Scheme and is included as Appendix A5.1 in Volume 4 of this EIAR. The CEMP will be updated by the NTA prior to finalising the Construction Contract documents for tender, so as to include any additional measures required pursuant to conditions attached to An Bord Pleanála's decision. It will be a condition of the Employer's Requirements that the successful appointed contractor, immediately following appointment, must detail in the CEMP the manner in which it is intended to effectively implement all the applicable mitigation measures identified in this EIAR. The CEMP has regard to the guidance contained in the Guidelines for the Creation, Implementation and Maintenance of an Environmental Operating Plan (TII 2007), and the handbook published by CIRIA in the UK, Environmental Good Practice on Site Guide, 4th Edition (CIRIA 2015) …."

7) <u>Impacts for Biodiversity and Wildlife along River Poddle at Stone Boat.</u>

EIAR Volume 2 Chapter 12 Biodiversity assesses the potential impacts on biodiversity as a result of the construction and operation of the Proposed Scheme (which includes the area at the Stone Boat).

The EIAR presents the output of the biodiversity assessment and contains information regarding, *inter alia*, the biodiversity baseline scenario, the potential impacts on biodiversity, the mitigation measures and the predicted residual effects associated with the Proposed Scheme.

The area referred to as the Stone Boat is comprehensively addressed in the Chapter for example:

Section 12.2.3.4 Aquatic states*;" The desk study identified two sites where water bodies may be subject to significant disturbance as a consequence of the Proposed Scheme. Aquatic surveys were carried out at a number of locations namely: the proposed Poddle Cycleway and Stone Boat Boardwalk at Mount Argus View…"*

Section 12.2.3.5 states: *"The desk study identified two sites where waterbodies may be subject to disturbance (i.e. piling) as a consequence of the Proposed Scheme. These sites are the proposed Poddle Cycleway and Stone Boat Boardwalk at Mount Argus View and the proposed cycle / pedestrian bridges on each side of the existing Robert Emmet Bridge, over the Grand Canal. A corridor of approximately 150m upstream and downstream of the crossing points was surveyed to identify the presence of otter holts…."*

Section 12.2.3.7 states: *"The desk study identified two sites where waterbodies may be subject to significant disturbance (i.e., piling and in-stream works) as a consequence of the Proposed Scheme. These sites are located at the proposed Poddle Cycleway and Stone Boat Boardwalk at Mount Argus View and the proposed cycle / pedestrian bridges on each side of the existing Robert Emmet Bridge, over the Grand Canal….*

Section 12.3.9.1 states: "Kingfisher habitat suitability assessments surveys carried out in November 2020, and ad hoc otter surveys carried out in March 2022, did not record evidence of any nest holes within 500m upstream or downstream of the proposed Stone Boat Boardwalk at Mount Argus View…."

Section 12.4.3 describes the potential biodiversity impacts that could occur as a result of the construction of the Proposed Scheme. The proposed works at the Stone Boat are specifically referenced and include:

Section 12.4.3.2.1 states with respect to habitat loss: *"The habitat type depositing / lowland rivers (FW2) may also be affected by the Proposed Scheme and is considered to be of Local Importance (Higher Value). The River Poddle occurs within the Proposed Scheme route, running through Kimmage and Harold's Cross as it makes it way to its discharge point into the River Liffey at Wellington Quay. It is culverted in several places but appears above ground in Poddle Park and Mount Argus Park. The construction of the proposed Stone Boat Boardwalk along the River Poddle at Mount Argus View will involve bored piles into the vegetated bank set back from the River Poddle. The boardwalk will be elevated above the river level…… The Proposed Scheme will not result in any permanent loss of this habitat type. Therefore, there is no potential for significant effects at any geographic scale…"*

Section 12.4.3.2.2 states with respect to surface water quality: *"During the construction of the proposed Stone Boat Boardwalk at Mount Argus View and the proposed offline cycle / pedestrian bridges on each side of the existing Robert Emmet Bridge, suspended solids arising from the release of sub-surface sediment during works here have the potential to enter either the River Poddle (in the case of the Stone Boat Boardwalk) or Grand Canal pNHA (in the case of the offline cycle / pedestrian bridges) and travel downstream, potentially, into the Liffey Estuary Upper / Lower. Cement-based products used in the Construction Phase of the Proposed Scheme (e.g. concrete and / or bentonite which are highly corrosive and alkaline materials), if released into the River Poddle, Grand Canal pNHA or Liffey Estuary Upper / Lower may cause surface water degradation and damage to aquatic habitats."*

Section 12.4.3.4.3.1 states with respect to otter breeding/resting sites: No in-stream / bankside works are proposed along any watercourse intersected by the Proposed Scheme, with the exception of the construction of the offline cycle / pedestrian bridges alongside each side of the Robert Emmet Bridge on the Grand Canal and the Stone Boat Boardwalk at Mount Argus View. Considering the works along the Grand Canal are localised and short-term, the Proposed Scheme will not have a likely significant effect on the conservation status of otter, as there will be no loss of breeding / resting sites, and will not have a likely significant negative effect, at any geographic scale.

Section 12.4.3.4.3.3 states with respect to otter habitat: *"During construction it is likely that the disturbance associated with these works will render the Grand Canal habitat in the immediate vicinity of Robert Emmet Bridge unsuitable for foraging / commuting otter…….The scale of habitat loss, through fragmentation, will be relatively small when compared to the availability of other suitable riparian habitats present in the wider environment of the surface water catchments that will be crossed by the Proposed Scheme. Otter are known to routinely use highly modified habitat within culverts and beneath bridges. Habitat fragmentation arising from the Proposed Scheme would not constitute a significant decline in the extent of available otter habitat and will not affect the local otter population's ability to maintain itself, even in the short-term. Habitat loss associated with the construction of the Proposed Scheme will not have a likely significant effect on the conservation status of otter and will not have a likely significant negative effect, at any geographic scale."*

Section 12.4.3.4.3.4 states with respect to otter habitat severance; *"The proposed cycle / pedestrian bridges on either side of the existing Robert Emmet Bridge over the Grand Canal, and the proposed Stone Boat Boardwalk over the River Poddle, could result in a barrier effect to local otter populations. No in-stream works are proposed as part of the Proposed Scheme. Given that otter are generally nocturnal and works will typically be carried out during normal daylight working hours, affected otters would be expected to habituate to the altered landscape and any resulting barrier effect would be temporary in nature (see Section 12.4.3.4.3.5 on disturbance / displacement and the habituation of otters to disturbance). The severance / barrier effect of construction works on otter is not likely to affect the local population, over even the short-term, and is not likely to affect the species conservation status and result in a significant negative effect, at any geographic scale."*

Section 12.4.3.4.4.1 states with respect to water quality: *"….During construction of the proposed Stone Boat Boardwalk over the River Poddle, sediment may be released into the river and potentially be*

transported downstream to the Liffey Estuary Upper….Mitigation measures have been designed to protect water quality during construction (see Section 12.5.1.2.2).”

Section 12.4.3.4.5 states with respect to other mammals: *“No other protected mammal species were recorded during the multidisciplinary surveys carried out along the Proposed Scheme. However, based on the results of the desk study, several mammal species protected under the Wildlife Acts, are known to occur in the wider environment, including red squirrel, hedgehog and pygmy shrew.”*

Section 12.4.3.5.1.1 states with respect to breeding bird habitat loss: “…*The proposed Stone Boat Boardwalk will require the removal of amenity grassland habitat with low potential to support nesting / foraging habitat for riparian bird species, along the River Poddle, at least in part to allow for the piled supports for the boardwalk to be inserted into the existing riverbank…. None of the habitat areas to be lost are unique to the locality and, either individually or collectively, are not likely to support a significant proportion, or the only population, of any given breeding bird species locally. Although a temporary decline in overall breeding bird abundance could potentially occur at a very local level (i.e. the footprint of the Proposed Scheme), this is unlikely to affect the local range of the breeding bird species present, nor is it likely to affect the ability of these breeding bird populations to maintain their local populations in the long-term. Environmental Impact Assessment Report (EIAR) Volume 2 of 4 Main Report Kimmage to City Centre Core Bus Corridor Scheme Chapter 12 Page 74 Mitigation measures will be implemented to reduce the effects of habitat loss on breeding bird species locally (see Section 12.5.1).”*

Section 12.4.4 describes the potential biodiversity impacts that could occur as a result of the operation of the Proposed Scheme. The proposed boardwalk at the Stone Boat is specifically referenced and includes:

Section 12.4.4.4.3 addresses the potential impacts on otters. It concludes under a variety of topics that the Proposed Scheme (and specifically the boardwalk) will not result in significant impacts on otters at any geographic scale.

Section 12.4.4.5 addresses the potential impacts on birds. Localised disturbance effects on breeding birds will most likely be of greater impact at the River Poddle, than the remainder of the Proposed Scheme. The provision of the Stone Boat Boardwalk along the River Poddle has the potential to result in increased human presence in this area. It is considered that there may be temporary non-significant effects on breeding riparian birds at a local scale, until such a time that they have established new nesting sites.

Section 12.5 outlines the detailed mitigation measures that will be implemented along the Proposed Scheme to minimise impacts. A Surface Water Management Plan (see Section 12.5.1.2.2) has been prepared and will be implemented by the contractor. Additional measures are proposed for the Construction of the Stone Boat boardwalk.

Section 12.6 sets out the residual impacts as a result of the construction and operation of the Proposed Scheme. Tables 12.15 and 12.16 summarise the construction and operational phase significant residual impacts respectively. No significant residual biodiversity impacts are predicted as a result of the Proposed Scheme (including for the Stone Boat).

Figure 2-4-2: River Poddle at The Stone Boat

2.4.4 Traffic

Summary of issue raised:

General Transport Strategy

1) Corridor not in Transport Strategy for GDA.
2) Metro Alternative.
3) Other measures for modal shift to public transport.
4) Park & Ride required further south.

Bus Services and CBC Scheme Benefits

5) Road space is not fairly allocated by mode share.
6) Car trips will only decline by 1.5% and some local journey times will more than double in distance and time. Implications for Climate Action Plan commitments due to increased fuel consumption.
7) Very small increases in proposed bus services.
8) Very small time saving for bus does not justify the bus gates.
9) Queries about different modal shift figures for 2028 & 2043.
10) Comparison of benefits with other CBC schemes are unimpressive.
11) Overall scheme benefits are very limited for unjustified disruption: only 1.5 minutes time saving for buses in PM peak.
12) New bus routes should become operational before the bus gates are in place.
13) Removal of No.83 bus terminus will have negative impact for some local residents.
14) Provide local school bus services.
15) Insufficient provisions for mobility impaired on buses and private vehicle alternative displaced to other routes.
16) Monitoring of scheme in operation.

Transport Impact Assessment

17) Traffic survey data is from pre-COVID and out of date.
18) Insufficient traffic modelling information.

Southwest Sector Combined Impacts

19) Cumulative traffic restrictions across the wider area of 3 CBCs / Assessment required of 3 CBCs in combination. “Failure of NTA to provide cumulative traffic modelling or the impacts of several corridors..”
20) Traffic restrictions proposed at 36 different locations across the 3 schemes will cause extensive displacements, disruption, and delays.

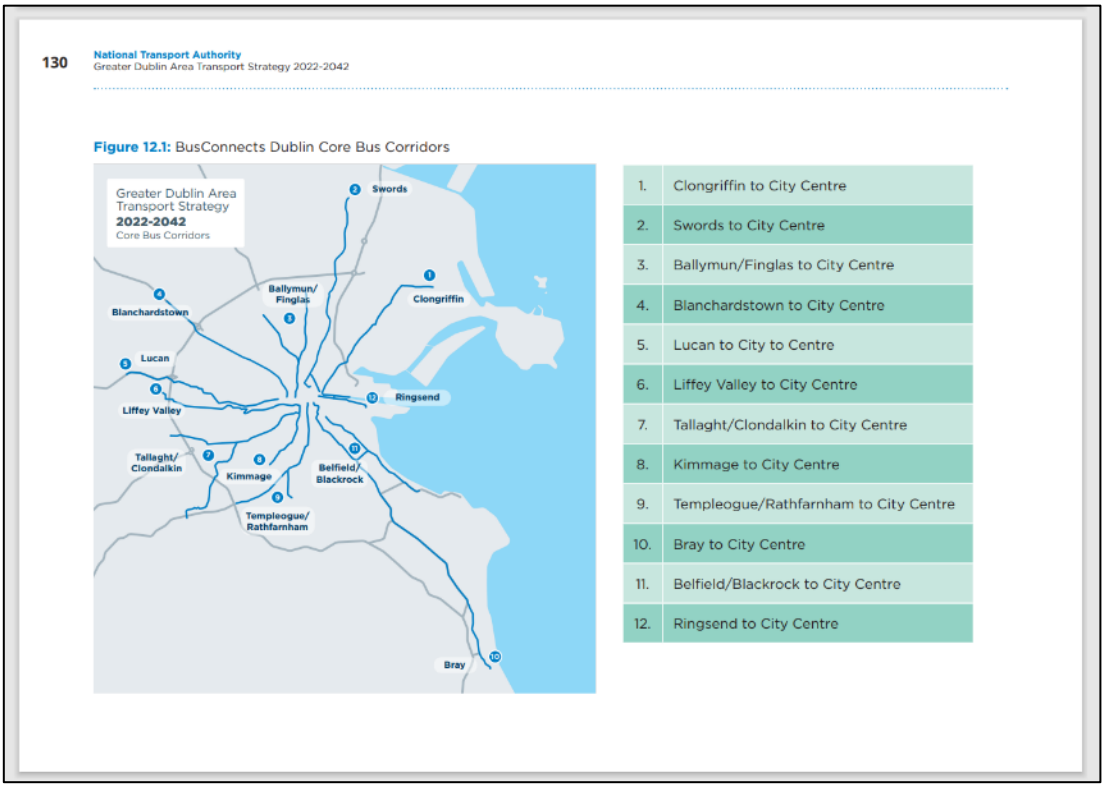
21) Increased traffic pressure on Terenure Road North / Harold's Cross Road in combination with diversion by Rathfarnham / Templeogue CBC: from 7,000 to 14,000 vehicles per day?
22) Restrictions for lorries on Kimmage Road Lower – delivery routes generally across SW sector.
23) Bus Gates in Kimmage will increase traffic on Wellington Lane, Templeogue, which will impact the cycle route towards Kimmage.
24) F2 Bus Route start location with removal of roundabout at Spawell in Templeogue / Rathfarnham CBC Scheme? Will there be enough capacity on the service?
25) Severely restricted access by car from Templeogue to City Centre.
26) Interaction with other CBC scheme bus gates in Rathmines will increase traffic on Leinster Road.
27) Bus Gate enforcement and advance signage at M50.
28) Every journey is not into the city centre / Access restricted to many businesses along the route at Portobello, Harold's Cross, and Kimmage / Diverted delivery routes past many bus gates across SW sector: 20 bus gates on 5 bus corridors.
29) Access restrictions to Mount Jerome Cemetery due to bus gates and traffic restrictions.

Responses to issues raised:

General Transport Strategy

Core Bus Corridor Network in the Greater Dublin Area Transport Strategy

One submission (No.4) said that the Kimmage Corridor is not included in the Greater Dublin Area Transport Strategy. This is not correct, and the Kimmage Corridor is listed among the 12 proposed Core Bus Corridor Schemes on page 128 of the Greater Dublin Area Transport Strategy 2022-2042, and on the map in Figure 12-1 on page 130 of the document as shown below.



Extract from the Greater Dublin Area Transport Strategy 2022-2042

The Kimmage Core Bus Corridor had not been specifically identified in the earlier Transport Strategy for the period 2016 to 2035. Various refinements to the Core Bus Corridor network were made on foot of further assessment of the network, which was updated when included in the Transport Strategy for the period 2022 to 2042.

Metro Alternative

The consideration of these and other strategic alternatives have been considered through the preparation of both the GDA Transport Strategy 2016 – 2035 and the new GDA Transport Strategy 2022 – 2042. This is presented Chapter 3 Consideration of Reasonable Alternatives of Volume 2 of the EIAR. Section 3.2.1 states:

> *"The National Transport Authority (NTA) Greater Dublin Area Transport Strategy 2022 – 2042 (hereafter referred to as the 2022 GDA Transport Strategy) (NTA 2022) replaces the prior Transport Strategy for the Greater Dublin Area 2016 – 2035 (hereafter referred to as the 2016 GDA Transport Strategy) (NTA 2016a). The prior 2016 GDA Transport Strategy set out to contribute to the economic, social, and cultural progress of the Greater Dublin Area (GDA) by providing for the efficient, effective and sustainable movement of people and goods. In other words, it was about making the Dublin region a better place for people who live and work there, and for those who visit…."".*

Section 3.2.1 goes on to say that:

> *"…The challenges outlined in the GDA Transport Strategy 2016 - 2035 and identified need for BusConnects Dublin as determined in the preparation of that prior strategy remain, and the evidence from the detailed corridor studies undertaken in the preparation of the prior strategy is still valid and robust. These studies are set out in section 3.2.2."*

Section 3.2.2 sets out the development of the prior strategy and the various studies that informed the strategy.

> *"The prior GDA Transport Strategy 2016-2035 was prepared by the NTA pursuant to Section 12 of the Dublin Transport Authority Act 2008 and approved by the Minister for Transport, Tourism and Sport in February 2016 in accordance with sub-section 12(13) of that Act. The prior GDA Transport Strategy provided a comprehensive framework to guide the development of transport across the Greater Dublin Region over the period of that strategy. Careful consideration was undertaken of the transport requirements across the seven counties of the GDA, and the prior GDA Transport Strategy then formulated the appropriate transport responses to those requirements. Various studies and reports were undertaken in the development of the prior GDA Transport Strategy, including:*
>
> - *Area-based studies covering the GDA area;*
> - *Demand Management Study;*
> - *Core Bus Network Study;*
> - *Park & Ride Study;*
> - *Transport Modelling Analysis; and*
> - *Environmental reports.*
>
> *Specifically, a Strategic Environmental Assessment (SEA) was undertaken on the prior GDA Transport Strategy (NTA 2016). As set out in the Environmental Report, in respect of which the SEA of the prior GDA Transport Strategy was undertaken, a number of reasonable alternative strategies were devised and assessed, taking into account the objectives and the geographical scope of the strategy. The provisions of the prior GDA Transport Strategy (including bus-based transport modes), were evaluated for potential significant effects, and measures integrated into the prior Strategy on foot of SEA recommendations in order to ensure that potential adverse effects were mitigated.*
>
> *In considering the alternative modes on a corridor basis, the environmental assessment undertaken considered that bus-based projects could contribute towards facilitating the achievement of Ireland's greenhouse gas emission targets in terms of emissions per passenger per kilometre.*
>
> *In addition to direct studies and analyses undertaken as part of the 2016 GDA Transport Strategy preparation work, the 2016 GDA Transport Strategy also took into account prior reports and plans in relation to transport provision. These prior studies included, inter alia, the following:*
>
> - *Greater Dublin Area Cycle Network Plan 2013 (hereafter referred to as the 2013 GDACNP) (NTA 2013);*

- *Bus Rapid Transit (BRT) Core Dublin Network report (hereafter referred to as the BRT Core Dublin Network report) (NTA 2012a);*
- *Fingal / North Dublin Transport Study (NTA 2015);*
- *Review of the DART Expansion Programme;*
- *Various prior Luas studies (including Line B2 (Bray), Line D1 (Finglas), Line F1 and F2 (Lucan and Liberties) and Line E; and*
- *Analysis carried out for the Greater Dublin Area Draft Transport Strategy 2011 - 2030 (NTA 2012b).*

Given the importance of bus transport as the main public transport mode for the overall region, the delivery of an efficient and reliable bus system formed an important element of the prior GDA Transport Strategy, integrated appropriately with the other transport modes. As Dublin is a low-density city with a large geographic footprint, there are few areas with the size and concentration of population necessary to support rail based public transport, and the bus system remains essential to serve the needs of much of the region. …

The development of the prior GDA Transport Strategy took into account the data and analysis provided through the supporting studies and background information and formulated an overall integrated transport system to serve the needs of the GDA up to 2035. In relation to public transport, the prior GDA Transport Strategy and the GDA Transport Strategy 2022-2042 set out a network of heavy rail, metro, light rail and bus proposals, with those networks combining to serve the overall public transport needs of the region..."

Consideration has been given to both a light rail or metro option for the corridor and details are presented in Chapter 3 Consideration of Reasonable Alternatives of Volume 2 of the EIAR.

With respect to light rail, Section 3.2.5 states:

"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 about 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 2016 GDA Transport Strategy (NTA 2016a) 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 higher capacity rail solutions. As part of that deliberation, the option of a light rail corridor from the City Centre (Christchurch) to Dundrum through Clanbrassil Street and Harold's Cross, which had been the subject of a feasibility study by the Railway Procurement Agency (RPA) in 2008, was considered (see Image 3.2). That feasibility study indicated a low level of potential passenger usage of the line, well below the level justifying the higher level of investment associated with a light rail scheme. In addition, the report noted that:

'[g]iven that development in the area is of a low density and sprawling nature, with a lack of green field or brown field sites, it would appear unlikely that the population or employment figures would experience any substantial increase over the coming years.'

Subsequent to the completion of the Line E Feasibility Report, further transport analysis was carried out in 2010 / 2011 on the potential of developing the Rathfarnham to City Centre Luas Line. As part of the process of developing an overall transport strategy for the GDA, then called 'Vision 2030', the Luas Line to Rathfarnham was included in the transport modelling analysis undertaken in 2010. The output from the modelling work indicated that the forecast passenger demand in 2030 for the Rathfarnham to City Centre Luas Line would be between 1,235 and 1,300 passengers, depending on the overall strategy scenario being evaluated. Arising from that work, it was

concluded that the level of passenger demand for this line would be low, equating to only about a quarter of the capacity of a standard light rail line. Arising from the various studies and analysis that had been carried out, and the specific assessment and transport modelling work undertaken for the 2016 GDA Transport Strategy, it was concluded that a bus-based transport system would be the public transport solution in the corridor of the Proposed Scheme and that there would be insufficient demand to justify the provision of a light rail alternative, particularly given the low-density nature of development in this corridor. Similar to BRT, environmentally, the light rail option compared to the Core Bus Corridor proposal would be more impactful in terms of construction impacts, including flora and fauna, heritage, air and noise. 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 Core Bus Corridor proposals, bus-priority can be achieved through short lengths at pinch-points by the use of signal-control priority."

With respect to Metro, Section 3.2.6 states:

"As highlighted above, when considering the appropriate transport systems to meet the expected transport demand, metro systems are a higher capacity form of light rail, generally designed for peak hour passenger numbers exceeding about 7,000 passengers per hour per direction, and often catering for multiples of that level. Given the work carried out in relation to light rail assessment, and the level of likely public passenger use along this overall corridor assessed in the transport modelling work, the development of the 2016 GDA Transport Strategy (NTA 2016a) identified that a metro solution would not be economically justified within the area covered by this corridor. Accordingly, the 2016 GDA Transport Strategy concluded that a high quality bus based solution would be part of the proposed public transport solution in the corridor of the Proposed Scheme. A feasibility study was initiated in 2020 into an underground metro extending from the proposed MetroLink station at Charlemont through Terenure, Rathfarnham, Knocklyon and Ballycullen, as shown in Image 3.3…

….The assessment undertaken for the Metro Knocklyon Feasibility Study, indicated that the cost of the proposal would be in the region of €5 billion to €6 billion, with the anticipated benefits of the proposal being significantly less than the expected cost of the underground metro scheme (i.e. the benefit to cost ratio is well below 1:1). Overall passenger numbers were expected to be below the normal levels associated with an underground metro system, with low levels of all-day use, which is unsurprising given the absence of major destinations along the potential route. In view of the costs of a potential underground metro scheme, and the comparatively low levels of anticipated overall usage, the provision of a metro along this corridor is not considered the appropriate public transport solution, reinforcing the findings of the 2016 GDA Transport Strategy. In addition, 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. Environmentally, in comparison to the Core Bus Corridor proposal, the metro alternative would be more impactful in terms of construction impacts, including flora and fauna, heritage, air and noise. Metro systems require 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 bus-based transport solution, bus-priority can be achieved through short lengths at pinch-points by the use of signal-control priority."

This application is solely for the infrastructure proposals associated with this corridor. As noted in 6.4.6.6.2.6 Increased Bus Frequency – Resilience Sensitivity Analysis of Chapter 6 states the following:

"For the purposes of this EIAR and the transport modelling undertaken in support of the EIAR, no increase in bus service frequency beyond that planned under the current Bus Connects Network redesign proposals was assessed. The bus frequencies used in the modelling are based on the proposed service rollout as part of the BusConnects Network Redesign and are the same in both the Do Minimum and Do Something scenarios. This rollout is currently underway. The rationale for undertaking this approach was that the planning consent being sought and which this EIAR supports is solely for the infrastructural improvements associated with providing bus priority and other sustainable modes measures along the Proposed Scheme."

As noted in 6.4.6.2.6.2 Resilience Testing:

"A key benefit of the provision of a resilient BusConnects Service network, one which can provide reliable and consistent journey times, is that it has potential to cater for further significant transfer from private car travel to more sustainable and environmentally friendly travel via public transport. To assess the resilience of the Proposed Scheme to cater for additional bus service frequency provision whilst maintaining a high level of bus journey time reliability, a separate analysis was undertaken in the Proposed Scheme micro-simulation model.

In this analysis, the service frequency, in both directions of travel, was increased to achieve a 10 buses per hour increase, at the busiest section, to assess whether the Proposed Scheme could cater for this increased service frequency whilst maintaining a high level of journey time reliability. The analysis was undertaken in the 2028 Minimum and Do Something models to assess whether the bus priority infrastructure was having the desired impact of protecting bus journey time reliability."

The assessment therefore shows that if required, additional buses can be introduced to match passenger demand of c. 4,500 passengers per hour per direction, if necessary, which is considerably more than required for the Kimmage Core Bus Corridor...

It is noted that the current GDA Transport Strategy 2022 – 2042 acknowledges the need to continue to assess the need for light rail or metro connections to the southwest in future to accommodate future growth which necessitate the need to upgrade the system beyond a bus-based solution post 2042. In terms of metro, Section 12.3.2 of the GDA Transport Strategy 2022 – 2042 states:

Measure LRT2 – Further Metro Development

In reviewing and updating the Transport Strategy, which takes place every 6 years, the NTA will assess the requirement to provide additional Metro lines in the GDA based on updated forecast demand for travel and on emerging significant changes in land use and spatial policy, including previously considered options to extend Metrolink southwards towards UCD, or along the existing Luas Green Line, or towards South West Dublin.

With respect to light rail, section 12.3.8 of the GDA Transport Strategy 2022 – 2042 states:

Measure LRT7 – Post-2042 Luas Lines

The NTA will undertake detailed appraisal, planning and design work for the following Luas lines, with a view to their delivery in the period after 2042:

1. City Centre to Clongriffin;

2. City Centre to Beaumont and Balgriffin;

3. Green Line Extension to Tyrrelstown;

4. City Centre to Blanchardstown;

5. Red Line Reconfiguration to provide the following lines:*

a. Clondalkin-City Centre; and

b. Tallaght-Kimmage-City Centre. 6. Tallaght to City Centre via Knocklyon;*

7. Green Line Reconfiguration to provide the following lines:*

a. City Centre to Bray via UCD and Sandyford; and

b. Sandyford to City Centre

* Subject to Measure LRT2

It is noted that the Tallaght to City Centre via Knocklyon line could serve areas close to the Proposed Scheme.

Other Measures for Modal Shift to Public Transport:

A number of the submissions requested that other less intrusive elements of the BusConnects programme were implemented first to understand the benefits of these in advance of committing to the infrastructure works. Some of the measures suggested included cashless fares, park and ride and

congestion charging. It is suggested in many of these submissions that these measures would enhance bus journey times and reliability and therefore remove the need for road widening to facilitate bus priority.

As set out in Section 2.2.1.6 of Chapter 2 Need for the Scheme of Volume 2 of the EIAR,

> *The BusConnects programme seeks to greatly improve bus services in Irish cities, including Dublin, so that journeys by bus will be fast, reliable, punctual, convenient and affordable…*
>
> *The full programme for BusConnects Dublin includes a range of interlinked and complementary proposals including:*
>
> 1) *Management elements: Redesigning the network to increase the number of homes, jobs and services with coverage, improving orbital accessibility and restructuring radial routes into spines;*
> 2) *Technological elements: Introducing new ticketing systems to improve convenience and reduce dwell time at bus stops;*
> 3) *Fleet elements: Replacing the bus fleet with low emission vehicles, introducing branding and livery to give a new "look and feel";*
> 4) *Policy elements: Introducing a 90-minute ticket to remove the financial penalty for interchanging between buses or changing mode during trips; and*
> 5) *Infrastructure elements: Creating infrastructure to separate buses and cyclists from other traffic to make sustainable travel a faster, safer and more reliable choice. Developing interchange hubs. Improving pedestrian facilities around bus stops.*
>
> *BusConnects Dublin is a suite of transformative changes to the bus system, intended to make it more efficient, faster, reliable and easier to use.*
>
> *The BusConnects Dublin programme contains nine elements, one of which is the BusConnects Dublin – Core Bus Corridor Infrastructure Works (the CBC Infrastructure Works). The nine elements are: CBC Infrastructure Works;*
>
> - *Dublin Area Bus Network Redesign;*
> - *Transitioning to a new low emissions bus fleet;*
> - *State of the art ticketing system;*
> - *Cashless payment system;*
> - *Simpler fare structure;*
> - *New Park and Ride sites in key locations;*
> - *New bus livery providing a common style across all operators; and*
> - *New bus stops and shelters with better signage and information.*
>
> *The CBC Infrastructure Works are needed because they will 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.*
>
> *Each of the other elements individually brings its own benefits, but there are cumulative benefits that are dependent on the completion of the entire programme, given the network interdependencies between measures. The effectiveness of the programme is more than the sum of its parts. For example, some additional bus patronage will be attracted by simply adding new services and redesigning the network, but it will take an increase in speed and reliability to reach a wider segment of the market. Addressing fares and making the system easier to use will bring another market segment on board. Additionally, bringing all these changes to people's attention so that they can take advantage of the new opportunities would be difficult without refreshing the information system, the bus livery and the waiting environment.*
>
> *The implementation of these other elements will progress independently of the CBC Infrastructure Works element.*
>
> *The CBC Infrastructure Works brings a range of benefits as an element in its own right. However, the CBC Infrastructure Works is also integral to realising the fullest potential of the other elements.*
>
> *In the absence of the Proposed Scheme, bus services will operate in a more congested environment, leading to higher journey times for bus and lower reliability which will lead to reduced levels of public transport use, making the bus system far less attractive and less resilient to higher*

levels of growth. The absence of walking and cycling measures that the Proposed Scheme provides will significantly limit the potential to grow those modes into the future.

In terms of the sequencing of implementation of the BusConnects Programme elements, this is an ongoing process with many of the elements already being implemented (e.g., new bus network, transition to low emission fleet). As explained in the above extract from the EIAR, all elements are required to realise the fullest potential of the programme as a whole and the sequence in which they are delivered is irrelevant to this overall goal.

It is noted that the implementation of all elements of the BusConnects programme have been considered in the Do Minimum assessment scenario as set out in section 6.4.3.1:

The Do Minimum scenarios (in both 2028 and 2043) include all other elements of the BusConnects Programme of projects (apart from the CBC Infrastructure Works elements) i.e., the new BusConnects routes and services (as part of the revised Dublin Area bus network), new bus fleet, the Next Generation Ticketing and integrated fare structure proposals are included in the Do Minimum scenarios.

As such, any comparison within the EIAR between Do Minimum and Do Something scenarios is a direct comparison of the scenarios with and without the Proposed Scheme only.

Park & Ride

Some submissions have sought provision of a Park & Ride facility to the south of the Kimmage Core Bus Corridor Scheme and note that the proposed Park & Ride facility for bus at Kill on the N7 is not a suitable location for this sector of the south city.

Section 2.2.1.6 of Chapter 2 Need for the Scheme of Volume 2 of the EIAR sets out the following:

BusConnects Dublin is a suite of transformative changes to the bus system, intended to make it more efficient, faster, reliable and easier to use.

The BusConnects Dublin programme contains nine elements, one of which is the BusConnects Dublin – Core Bus Corridor Infrastructure Works (the CBC Infrastructure Works).

- *Core Bus Corridor Infrastructure Works;*
- *Dublin Area Bus Network Redesign;*
- *Transitioning to a new low emissions bus fleet;*
- *State of the art ticketing system;*
- *Cashless payment system;*
- *Simpler fare structure;*
- *New Park and Ride sites in key locations;*
- *New bus livery providing a common style across all operators; and*
- *New bus stops and shelters with better signage and information.*

New park and ride facilities form part of the broader BusConnects programme and will be implemented to complement improvements to the overall bus system, including the Proposed Scheme infrastructure. However, the network of proposed Park & Ride facilities is primarily intended to serve potential passengers from outer areas beyond the reach of the metropolitan public transport network, and to intercept them at the edges of the urban area. Park & Ride facilities are not proposed for locations along the Bus Network routes, as this network will be within walking distance of most people's homes.

As is illustrated in Figure 2-4-3, the bus network redesign provides a dense network of bus routes that extends far beyond the southern end of the Proposed Scheme which will provide a Core Bus Corridor for F-Spine south-westwards to where routes F1, F2 and F3 will spread out across the suburbs. These bus routes from the Kimmage Core Bus Corridor, along with other routes along the A-Spine and D-Spine will extend to the southern edges of the urban area. In this context, and because of the sparsely populated Dublin and Wicklow Mountains beyond the edge of the urban area, there will be no regional demand from further south to be served by a Park & Ride facility in this sector. Longer distance commuters will approach the Dublin area from either the southeast along the N11, or the southwest along the N7, for which demand there will be Park & Ride facilities along those national roads at suitable locations.

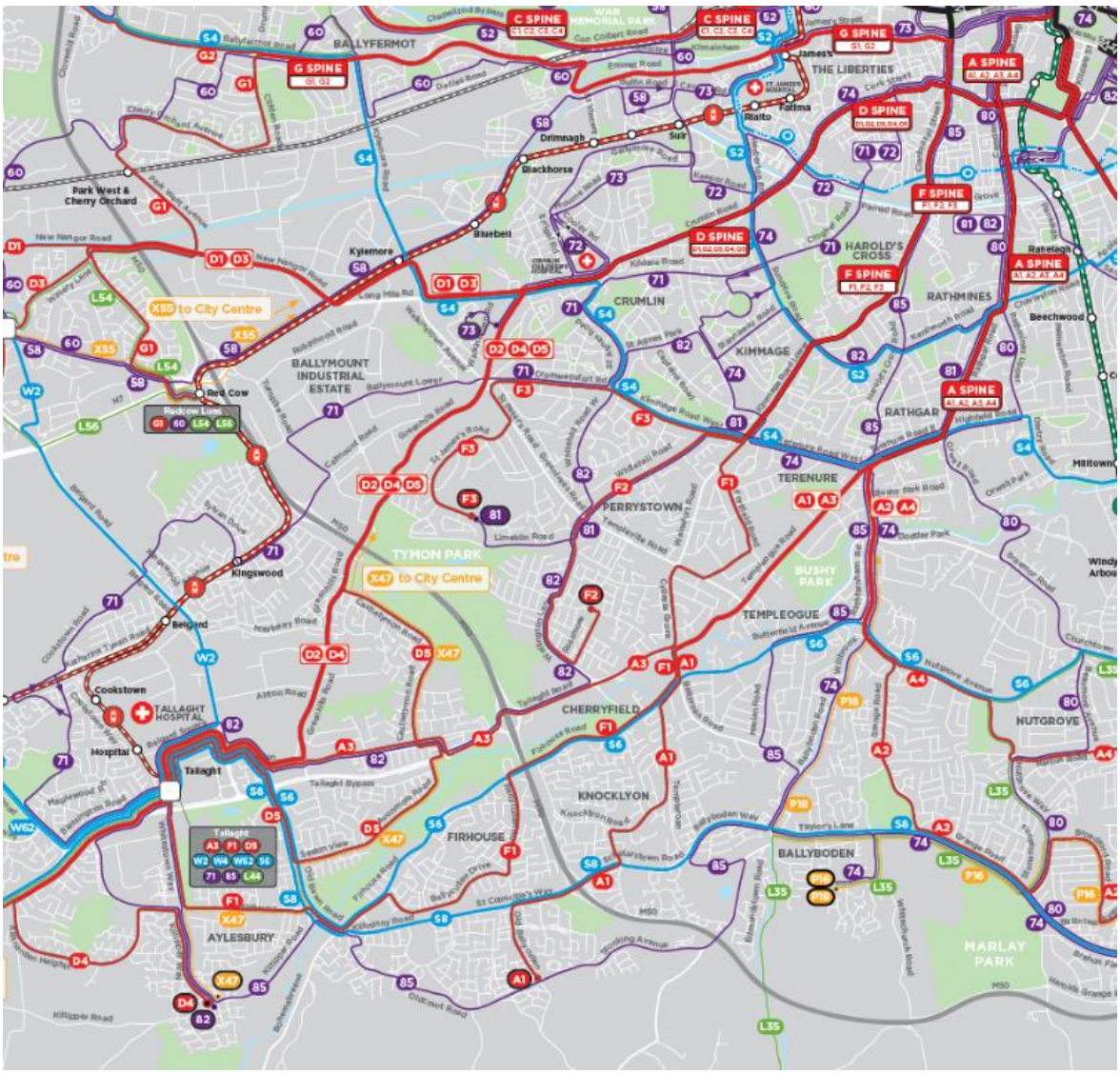


Figure 2-4-3: Bus Network Redesign in Southwest Sector

Network-Redesign-Map-2023.pdf (busconnects.ie)

Bus Services and CBC Scheme Benefits

Road Space Allocation by Mode Share

EIAR Volume 2, Chapter 6 Traffic & Transport describes the anticipated modal shares that will arise due to the Proposed Scheme as part of the overall improvements to the transport network across Dublin. Image 6.6 illustrates the mode shares for the morning peak in 2028 as Public Transport 69%, Walking and Cycling 21% and Car 10%. In this scenario, the Proposed Scheme could be considered to allocate too much of the road space for private transport, as on Harold's Cross Road for instance the traffic lanes will occupy 30% of the road width.

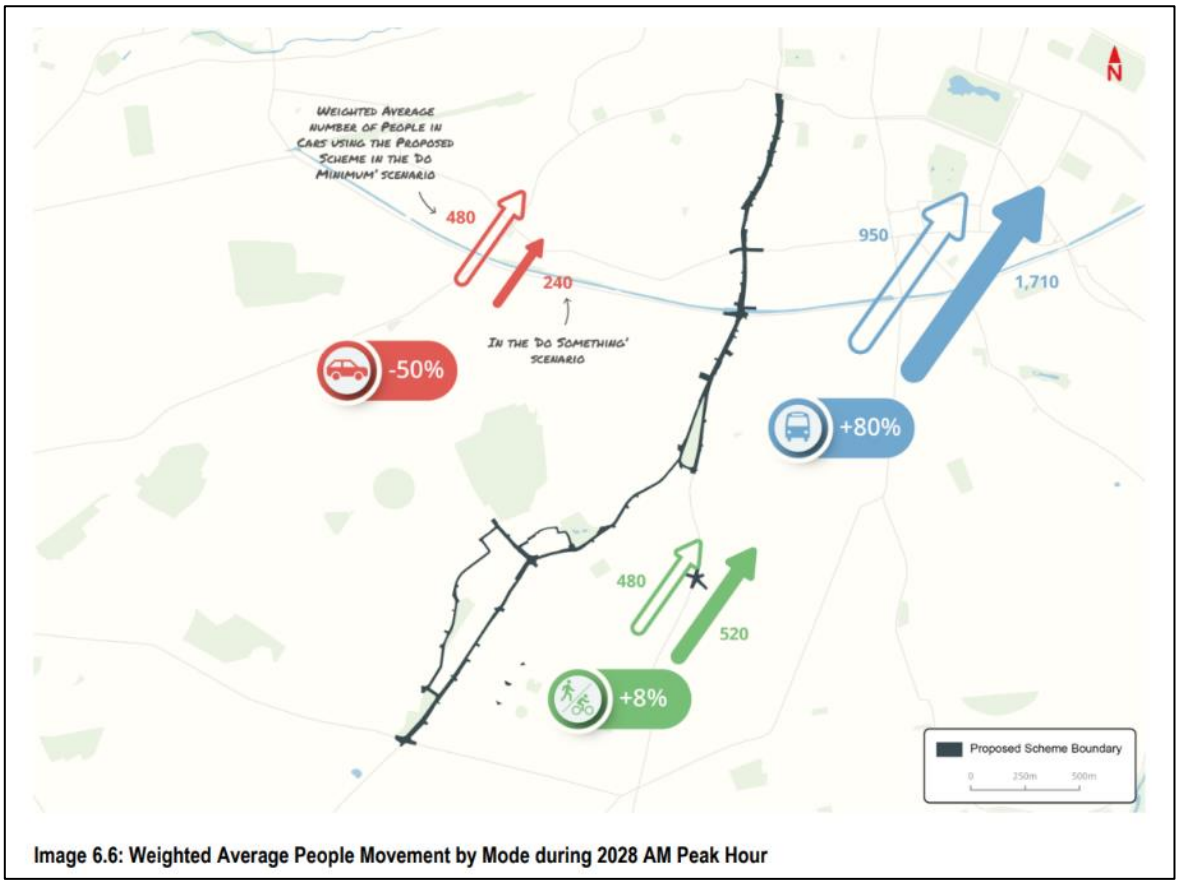


Image 6.6: Weighted Average People Movement by Mode during 2028 AM Peak Hour

Reduction in Car trips

One submission (No.64) notes that car traffic will only decline by 1.5%, and some local journey times will more than double in distance and time.

The submission has selected the figure for the decline in the volume of car traffic from the *Transport Strategy for the Greater Dublin Area 2022-2042* which applies for the whole of the metropolitan area in the context of a major increase in overall population and transport demand. This figure is not specific to the Proposed Scheme. As is shown in Image 6.6 from Chapter 6 of the EIAR the volume of car traffic along this corridor will reduce by 50%. The provision of bus gates in the Proposed Scheme will lead to longer car journeys for some trips, which will be proportionately higher for shorter trips, and less so for longer trips. These impacts for a small number of trips will arise so as to enable faster, more reliable, more sustainable trips by other modes, and safer journeys for cyclists in particular.

There will be significant benefits for the Climate Action Plan commitments due a major decrease in traffic generally, even if a small proportion of drivers will have increased fuel consumption due to longer journeys on alternative routes caused by bus gate restrictions on the more direct route.

Increase in Proposed Bus Services

The provision of bus services is separate from the Proposed Scheme and is planned to provide sufficient capacity to meet the projected demand as forecast. Once the public transport infrastructure is improved by the Proposed Scheme it will ensure better journey time reliability and capacity for the bus services, which can be adjusted as necessary as demand increases.

Time Saving for Bus

EIAR Chapter 6, page79 (Image 6.14) is shown in the following snapshot image. This indicates a wide range of existing bus journey times over the day ranging from less than 15 minutes minimum to a maximum of 29 minutes, which is double. It is this wide variability of journey time that undermines the reliability of the bus service and reduces the attractiveness of the service at peak periods especially. In

the Proposed Scheme the range in bus journey times will greatly reduce from 14 minutes to about 4 minutes such that the average journey time will be more consistent throughout the day. This benefit will derive from the combination of the proposed bus gates on Kimmage Road Lower, and the continuous bus priority along the rest of the route.

Table 6-40: F1 Service – Range of Journey Times (Inbound Direction)

Peak Hour	Do Minimum				Do Something			
	MIN	MAX	AVG	STDEV	MIN	MAX	AVG	STDEV
2028 AM	17.7	29.0	22.9	3	13.3	17.6	15.5	0.9
2028 PM	14.7	23.5	17.7	1.9	13.7	17.8	15.3	1.0
2043 AM	16.3	26.9	20.9	2.6	13.7	18.1	15.5	0.9
2043 PM	14.8	19.2	16.7	1.1	13.1	17.5	15.1	0.9

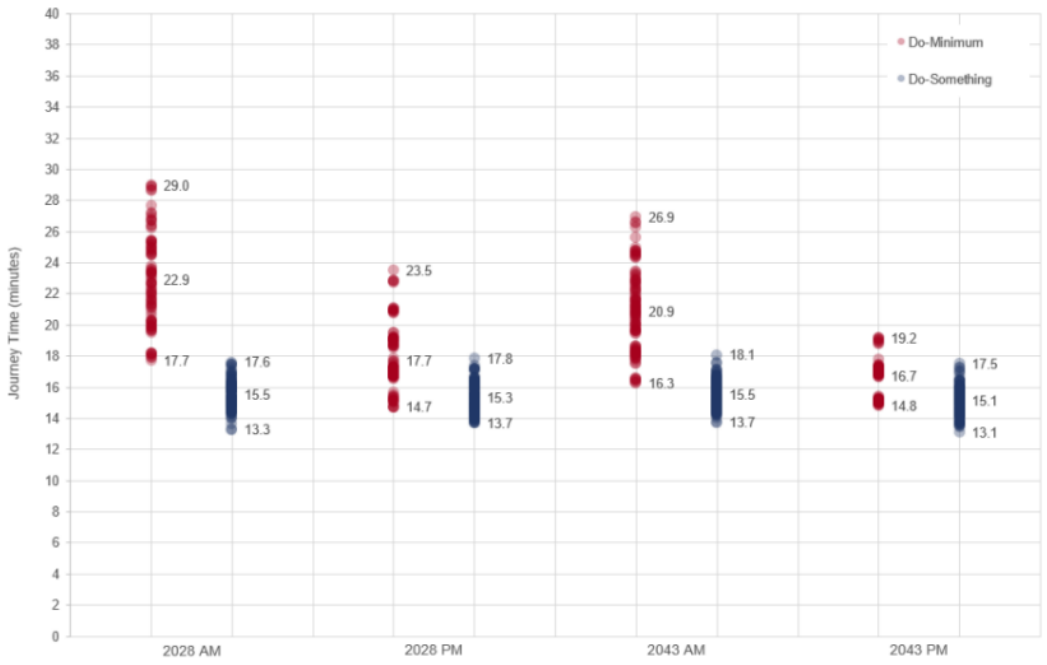


Image 6.14: F1 Bus Journey Times (Inbound Direction)

Technical Queries about Transport Impact Assessment

Different modal shift figures for 2028 & 2043.

There will be a major beneficial impact derived from the Proposed Scheme in 2028 with a modal shift to bus of 80%. Over the following 15 years this impact will diminish proportionately as the other elements of the GDA Transport Strategy such as Metrolink and the DART expansion programme are developed to greatly expand the overall public transport system in Dublin.

Benefits of Core Bus Corridor

One submission says that a comparison of the benefits of the Proposed Scheme with other CBC schemes is unimpressive. In this context it must be borne in mind that the Proposed Scheme is fairly short in length at 3.7km compared to other schemes such as the Templeogue-Rathfarnham scheme which is 10km long. The longer a bus route, the greater the potential benefits in terms of journey time saving, as delay is usually proportional to the length and average travel speed. In the case of the Proposed Scheme the estimated journey time savings from a minimum of 1.5 minutes minimum up to 5.5 minutes maximum as is shown in Table 6-40 of EIAR Chapter 6. However, as explained earlier, the primary benefit of the Proposed Scheme will be to support a more reliable bus service with more consistent journey times by reducing the range in bus journey time from 14 minutes to about 4 minutes.

The estimated modal shift of 80% to bus will derive from passengers having greater confidence in the bus service, rather than simply because of a shorter journey time.

For buses along the Proposed Scheme the average Journey Times inbound are forecast to improve by 32% in the 2028 AM peak (Table 6-39, Chapter 6, P28). In the outbound direction there will be a 16% improvement in journey time in the PM peak (Table 6-41, page 82). These are significant improvements coupled with the general reliability and consistency of the journey time across the day.

New bus routes should become operational before the bus gates are in place.

The BusConnects Network Redesign is already being implemented on a phased basis in advance of the development of improved infrastructure such as in the Proposed Scheme. By late 2023 the phased implementation of the revised network reached Phase 5B, in which there have been two new routes introduced in the Kimmage area consisting of Orbital Route S2 to replace Route No.18 along Sundrive Road, Larkfield Avenue and Clareville Road, and new Route No.74 from Dundrum via Terenure, Kimmage and Crumlin to the City Centre. The phased implementation of the revised network will continue separately from the Proposed Scheme.

Removal of 83 bus terminus will have negative impact for some local residents.

Changes to the bus route network is separate to the Proposed Scheme and was subject to a separate public consultation process.

Local School Bus Services.

There is no need for a separate local school bus service in an urban area with an extensive network of general bus services. The BusConnects Network Redesign is introducing a grid-type bus network that allows passengers to interchange between services on journeys in any direction across the city, rather than the previous network that was heavily focussed on the radial corridors. New and more frequent orbital bus routes are improving the speed and reliability of linked bus journeys across the urban area. This is especially beneficial for school trips which often do not coincide with the main radial corridors where school catchment areas extend across wider zones of the city and suburbs.

Accessibility for Mobility-Impaired People

One submission (No.51) says there are insufficient provisions for mobility impaired on buses, and that the private vehicle alternative will be displaced to other routes.

All public transport vehicles in Dublin are accessible to people with mobility impairment. In the Proposed Scheme, and on the other 11 Core Bus Corridor Schemes, the bus stops will be improved to a consistent standard to ensure that they are suitable for easy boarding and alighting from buses for people with mobility impairment. The benefits of the BusConnects programme, including both bus infrastructure and the bus services, will benefit people with mobility impairment through more reliable and frequent bus services. The upgraded bus corridor infrastructure will also benefit people with mobility impairment who use taxis, as there will be more continuous and reliable route priority provided.

For people with mobility impairment who prefer to travel by private vehicle, their journeys may need to be adjusted to avoid bus gate restrictions, but all parts of the route corridor will remain accessible for such vehicles.

Monitoring of Scheme in Operation.

Operational stage monitoring will be provided as part of the continuous management of the urban transport system across the Dublin area. There are existing arrangements and procedures that provide information about the operation of the transport system through both the National Transport Authority and the local authorities with information provided publicly on a regular basis. Briefings are provided for elected representatives at local and national level, which is the appropriate channel for communications with local communities. No further specific arrangements will be necessary in relation to BusConnects.

Transport Impact Assessment

A submission said that the traffic survey data is from pre-COVID and out of date, and also that there is insufficient traffic modelling information.

Section 6.2.5.2.2 of Chapter 6 of the EIAR notes the following in relation to the traffic counts undertaken:

> *"Due to the scale of the CBC Infrastructure Works, the Proposed Scheme required a full set of consistent updated traffic counts for a neutral period e.g. November / February when schools, colleges were in session. Traffic surveys were undertaken in November 2019 and February 2020 (Pre-Covid) with the surveyed counts used as inputs to the model calibration and validation process of the strategic model and micro-simulation model. The two types of counts used in the study are Junction Turning Counts (JTCs) and Automatic Traffic Counts (ATCs)."*

Since the disruption of COVID-19 there has been some shift of work patterns towards a greater share of remote working, which has reduced individual transport demand to a modest degree. However, in the meantime the number of people employed has grown substantially and overall transport demand has rebounded and grown to exceed the pre-COVID levels. The need for substantial improvements to the public transport and cycling infrastructure remains. As outlined in Appendix A6.1, Page 128, "It is envisaged that the population will grow by 11% up to 2028 and 25% by 2043 (above 2016 census data levels). Similarly, employment is due to grow by 22% by 2028 and 49% by 2043". The modelling has accounted for the population and employment growth envisaged for the region. In addition, the modelling has maintained trip generation assumptions at pre-COVID levels, which means that traffic demand in the modelling has not accounted for higher working from home levels that are currently prevalent. The traffic demand used in the assessments are therefore conservative and worst-case.

Section 6.2.3 of Chapter 6 of the EIAR sets out the extensive modelling exercise carried out in developing and assessing the Proposed Scheme. The following is noted:

> *"In summary, there are four tiers of transport modelling which have been used to assess the impacts of the Proposed Scheme:*
>
> - *Tier 1 (Strategic Level): The NTA's East Regional Model (ERM) is the primary tool which has been used to undertake the strategic modelling of the Proposed Scheme and has provided the strategic multi-modal demand outputs for the proposed forecast years;*
> - *Tier 2 (Local Level): A Local Area Model (LAM) has been developed to provide a more detailed understanding of traffic movement at a local level. The LAM is a subset model created from the ERM and contains a more refined road network model used to provide consistent road-based outputs to inform the TIA, EIA and junction design models. This includes information such as road network speed data and traffic redistribution impacts for the Operational Phase. The LAM also provides traffic flow information for the micro-simulation model and junction design models and has been used to support junction design and traffic management plan testing;*
> - *Tier 3 (Corridor Level): A micro-simulation model of the full 'end to end' corridor has been developed for the Proposed Scheme. The primary role of the micro-simulation model has been to support the ongoing development of junction designs and traffic signal control strategies and to provide bus journey time information for the determination of benefits of the Proposed Scheme; and*
> - *Tier 4 (Junction Level): Local junction models have been developed, for each junction along the Proposed Scheme to support local junction design development. These models are informed by the outputs from the above modelling tiers, as well as the junction designs which are, as discussed above, based on people movement prioritisation."*

A large number of figures are included in Chapter 6 of the EIAR to demonstrate the transport modelling carried out, and the NTA is satisfied that modelling and presentation of results is in line with best practice industry standards.

Southwest Sector Combined Impacts

Cumulative Traffic Restrictions

Several submissions comment on the cumulative traffic restrictions across the wider area of 3 Core Bus Corridors in the wider area around the Proposed Scheme and point to the need for "*cumulative traffic modelling of the impacts of several corridors."*

Section 21.2.7 of Chapter 21 of the EIAR outlines the cumulative traffic modelling which has been undertaken for the Operation Phase of the Proposed Scheme. The following is noted:

> *"For operational cumulative effects including the Proposed Scheme, the assessment has been undertaken based on a scenario where all the other 11 Core Bus Corridor schemes are also operational. This has been done for the following reasons:*
>
> - *It is the NTA's intention that all Core Bus Corridor schemes would be completed by 2028, therefore the scenario is considered to be reasonable; and*
> - *It is the largest scale option and therefore represents a reasonable worst case for operational effects in terms of redistribution of traffic and traffic related effects.*
>
> *The Do Minimum scenarios (in both 2028 and 2043) include all other elements of the BusConnects Programme (apart from the Core Bus Corridor Infrastructure Works elements) i.e. the new BusConnects routes and services (as part of the revised Dublin Area bus network), new bus fleet, the Next Generation Ticketing and integrated fare structure proposals are included in the Do Minimum scenarios.*
>
> *In 2028, other notable Do Minimum transport schemes include the roll out of the DART+ South West project, LUAS Green Line capacity enhancement and the Greater Dublin Area Cycle Network Plan implementation (excluding BusConnects Core Bus Corridor elements). As outlined above, the 2043 Do Minimum scenario assumes the full implementation of the GDA Strategy schemes and so assumes that proposed major transport schemes such as Metro-Link, LUAS line extensions to Lucan, Finglas, Poolbeg and Bray are all fully operational.*
>
> *Appendix A6.2 (Transport Modelling Report) in Volume 4 of the EIAR, contains further information on the modelling assumptions contained within the Do Minimum scenario including the full list of transport schemes included. For non-traffic modelling related CEA, the assessment is on the basis that the other shortlisted projects would all be in an operational state for the assessment.*
>
> *For traffic modelling related CEA, the Operational Phase scenario has been modelled including for background growth from reasonably foreseeable projects in line with regional growth projections and local development plans to capture the wider traffic effects expected from projected development in Dublin."*

Traffic Restrictions on 3 CBC Schemes

Traffic restrictions proposed at 36 different locations across the 3 schemes will cause extensive displacements, disruption and delays.

The impacts of all of the various traffic restrictions have been included in the transport modelling for each of the Core Bus Corridor Schemes, both on an individual and cumulative basis. There will be a significant compensatory effect due to the major modal shift from private traffic to public transport and cycling, which will reduce the overall traffic demand to be carried on fewer routes. Chapter 6 of the EIAR provides clear details of the decreases and increases of traffic flows across the general road network, so that the impact on each individual route may be seen. Examples are provided in the following responses.

Changes in traffic on Terenure Road North / Harold's Cross Road

One submission highlights that in combination with the diversion of traffic from Rathmines by the bus gate and traffic restrictions on Rathgar Road in the Rathfarnham / Templeogue CBC, they speculate could cause an increase in traffic on Terenure Road North and Harold's Cross Road from 7,000 to 14,000 vehicles per day.

The submission does not take into account the broader compensating effects across the road network that will arise from the overall BusConnects programme which will encourage a major modal shift to public transport, and to a lesser extent to cycling, which will greatly reduce the overall volume of car traffic. Details of the changes in traffic are provided in EIAR Volume 4, Part 1, Appendix A6.1, Section 7.2.6.3 General Traffic Flow Changes (Page 159) which shows a very low level of traffic change on any road type in the vicinity of the Proposed Scheme. Diagram 7.13 & 7.14 shows that there is a decrease in traffic on Terenure Road, but a small increase on the southern part of Harold's Cross Road due to local traffic diversion away from Kimmage Road Lower. From Harold's Cross Park northwards there will be a reduction in traffic on Harold's Cross Road due to the effective closure of Kimmage Road Lower for general traffic at the bus gate.

Delivery Routes

A submission comments on the restrictions for lorries on Kimmage Road Lower, in the context of delivery routes generally across the southwest sector in combination with the other CBC schemes.

For deliveries there will remain an extensive route network available that is not restricted for bus priority. While the overall number of bus gates may seem significant, they are widely dispersed across a big network, and each will have a mainly localised impact on a section of each bus corridor. There are many other non-bus corridor routes that will remain available for general traffic.

On the Proposed Scheme there will be suitable alternative delivery routes available that avoid the proposed bus gates during their operational hours, and these are discussed in each of the 3 route sections later in this response document.

Wellington Lane

A submission said that the Bus Gates in Kimmage will increase traffic on Wellington Lane, Templeogue, which will impact the cycle route towards Kimmage.

The impact assessment in EIAR Volume 2, Chapter 6 Traffic & Transport demonstrates in Image 6.26 that the Proposed Scheme will cause a general reduction and redistribution of traffic in a wide area along and to the south of the route corridor including routes such as Fortfield Road because of the bus gates north of the Kimmage Cross Road junction. However, there is no change for traffic indicated on Wellington Lane further out from the Kimmage area, by which time the network redistribution effects will have faded out.

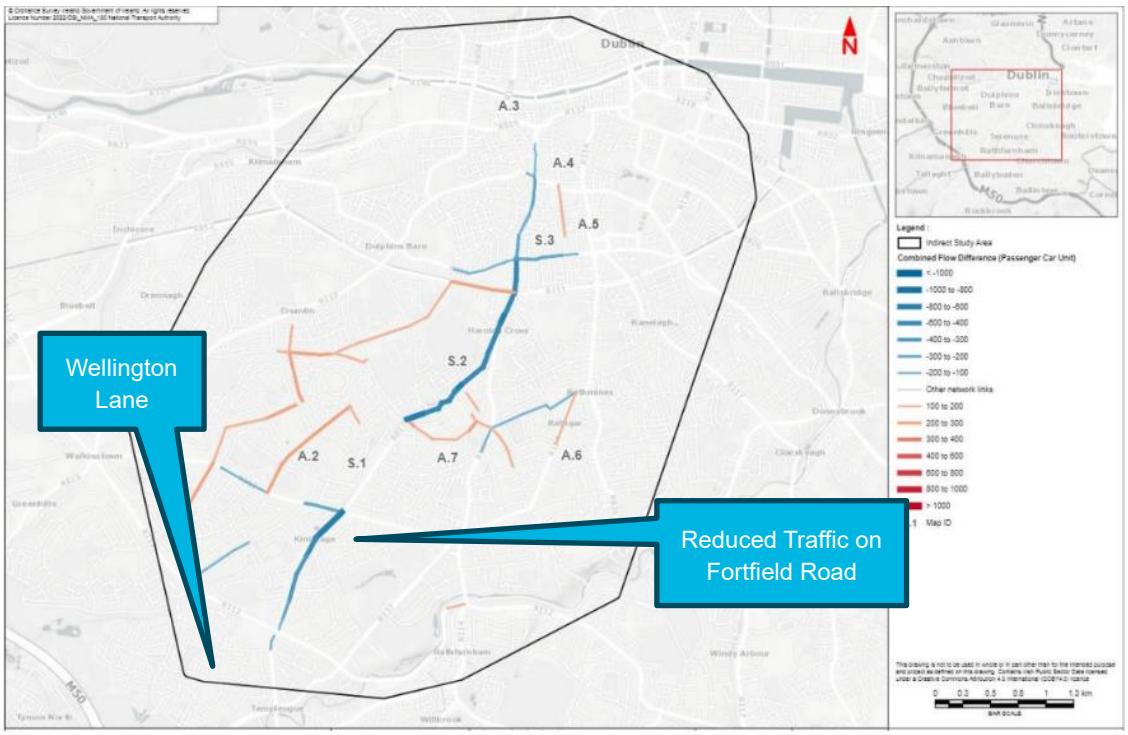


Image 6.26: Flow Difference on Road Links (Do Minimum vs. Do Something), AM Peak Hour, Opening Year (2028)

F2 Bus Route at Spawell Roundabout

A submission queried the how the F2 Bus Route will turn around at the start location with removal of the roundabout at Spawell in the Templeogue / Rathfarnham CBC Scheme?

The F2 service will be able to turn right at the new signalised junction at Spawell and turn around using the M50 junction 11 interchange roundabout.

Access by Car from Templeogue to City Centre

Some submissions describe how access by car from Templeogue towards the City Centre will be severely restricted.

The combined impact of the Kimmage and Templeogue-Rathfarnham CBC Schemes will reduce the number of routes available for general traffic towards the City Centre, so as to provide suitable priority for public transport and safer more comfortable cycling facilities. It is preferable in accordance with numerous policies for such trips to be made by non-car modes, especially at peak times. However, people will still be able to drive towards the city centre from Templeogue along two routes, either via Dodder Park Road and Rathfarnham Road through Terenure and Harold's Cross, or via Crumlin and Clogher Road.

Leinster Road

A submission says that interaction with the other CBC scheme bus gates in Rathmines will increase traffic on Leinster Road.

Details of the changes in traffic are provided in EIAR Volume 4, Part 1, Appendix A6.1, Section 7.2.6.3 General Traffic Flow Changes (Page 159) which shows a very low level of traffic change on any road type in the vicinity of the Proposed Scheme. There will be little change in traffic on Leinster Road.

Advance Signs on M50

A submission suggests that the operation of there should be advance signage of the bus gates at the M50 Junction 11.

It would not be practicable to provide signs on the M50 in relation to traffic restrictions in the Kimmage area a distance of nearly 4km away. Many drivers use navigational aids when planning their journeys, and these will include information about numerous traffic restrictions which would influence route choice well in advance. With the many traffic management measures proposed under the wider BusConnects programme, there will need to be a general information campaign to develop public awareness of the need to plan their car journeys to take account of the available routes.

Non-Radial Trips

One submission says that every journey is not into the city centre, that access will be restricted to many businesses along the route at Portobello, Harold's Cross, and Kimmage, with diverted delivery routes to get past many bus gates across the southwest sector with 20 bus gates on 5 bus corridors.

The BusConnects Network Redesign is introducing a grid-type bus network that allows passengers to interchange between services on journeys in any direction across the city, rather than the previous network that was heavily focussed on the radial corridors. New and more frequent orbital bus routes are improving the speed and reliability of linked bus journeys across the urban area. Thus it will be easier and quicker to travel across the city on a variety of routes once BusConnects is fully implemented. This is the main reason why the proposals are being put forward at the same time so as to provide a wider benefit than could be achieved by piecemeal adjustments along individual corridors.

For business trips throughout the day that are not suitable for public transport, there will remain an extensive route network available. While the overall number of bus gates may seem significant, they are widely dispersed across a big network, and each will have a mainly localised impact on a section of each bus corridor. There are many other non-bus corridor routes that will remain available for general traffic.

2.4.5 Bus Corridor in General

Summary of issue raised:

1) Support for Bus Gates by residents on Kimmage Road Lower to reduce traffic.
2) Delay for Buses on Fortfield Road, Kimmage Road West and Terenure Road West beyond the southern end of the CBC.
3) Changes to Number of Bus Stops.
4) Bus Gate Operational Hours
5) Delays for emergency vehicles due to bus gates and local road closures.
6) Integration of Bus routes in the proposed Dublin City Centre Transport Management Plan / Scheme name is misleading as it does not go as far as the City Centre / Routes F2 & 81

Responses to issues raised:

1) Support for Bus Gates on Kimmage Road Lower.

The NTA welcomes the submission with support for the proposed Bus Gates by residents on Kimmage Road Lower which they expect to greatly reduce traffic through their residential area.

2) Delay for Buses on Fortfield Road, Kimmage Road West and Terenure Road West beyond the southern end of the CBC.

The impact assessment in EIAR Volume 2, Chapter 6 Traffic & Transport demonstrates that the Proposed Scheme will cause a general reduction and redistribution of traffic in a wide area along and to the south of the route corridor. This can be seen in Figure 6-26 below which shows a significant reduction in traffic along Fortfield Road because of the bus gates north of the Kimmage Cross Road junction. Buses will not be delayed on Fortfield Road, Kimmage Road West and Terenure Road West

beyond the southern end of the CBC, and in fact will benefit from the upstream effects of the bus gate in reduced traffic flow.

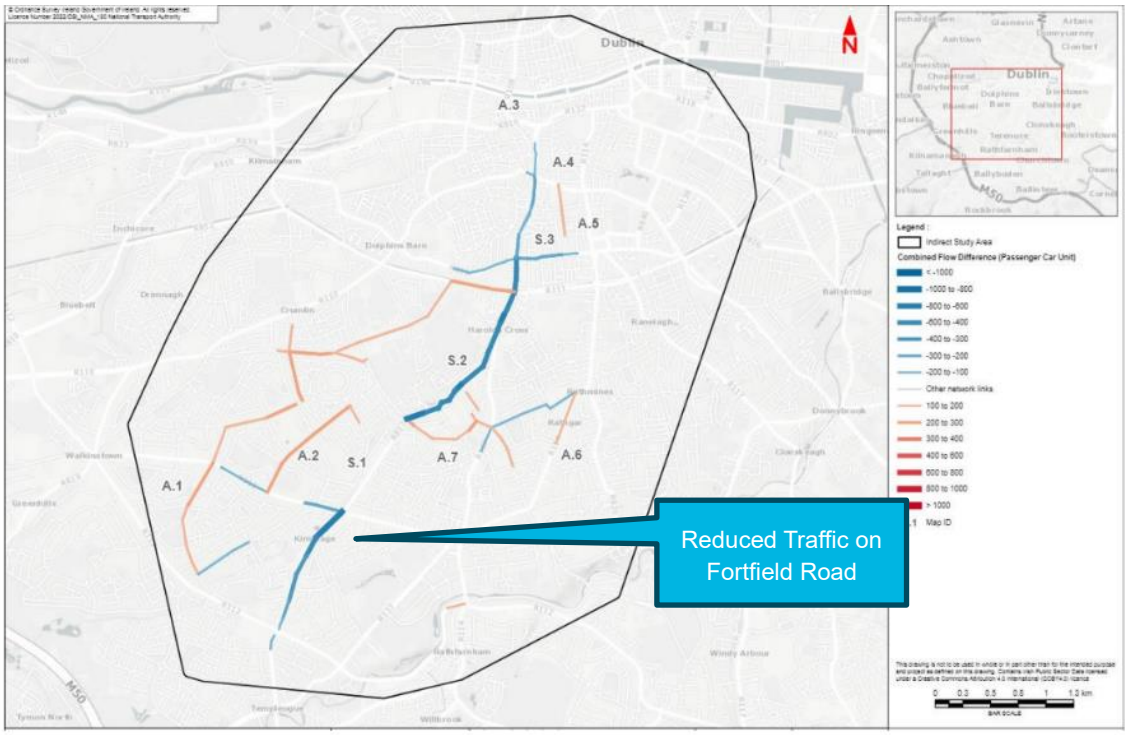


Image 6.26: Flow Difference on Road Links (Do Minimum vs. Do Something), AM Peak Hour, Opening Year (2028)

3) Changes to Number of Bus Stops.

Some bus stops are being removed which a submission says will be to the disadvantage of elderly or infirm passengers, with an objection to increased distance between bus stops.

In the Proposed Scheme there will be a general rationalisation and optimisation of bus stops to support a faster and more efficient bus service. In EIAR Volume 2, Chapter 4 Description of the Proposed Scheme, Section 4.6.4.5 describes the proposals for the provision of revised bus stop arrangements in which bus stops should be preferably spaced approximately 400m apart on typical suburban sections of route, dropping to approximately 250m in urban centres. In the Supplementary Information, Preliminary Design Report, Appendix H contains the Bus Stop Review Report which provides a detailed analysis in support of the proposals for changes to bus stops. A key consideration in the methodology was to improve the general accessibility to the bus services along with improving the efficiency of the service in terms of journey time. These improvements should benefit all bus passengers, including elderly or infirm passengers.

An example of the proposed rationalisation is on the 240m length of Kimmage Road Lower between Kimmage Crossroads and Ravensdale Park where there are two inbound bus stops (No.2438 and No.2439) with spacing of only 150m. These will be replaced with a single bus stop between the two existing locations, which will be paired with the outbound bus stop on the other side of the road and linked by a new signal-controlled pedestrian crossing just to the north of the junction of Hazelbrook Road. The provision of a single bus stop will contribute to the overall improvement of the bus services by reducing the need for buses to stop twice on this short section of street. The consolidated bus stop is also optimised in terms of walking distance from the surrounding area, and this will be assisted by the provision of a new signal-controlled pedestrian crossing to replace the existing uncontrolled crossing on a wide section of Kimmage Road Lower.

4) Bus Gate Operational Hours

The submissions include a request for the southern bus gate to open to traffic at 7pm rather than 8pm, that the bus gates are not necessary at weekends, that all bus gates should operate only at peak hours on weekdays. On the other hand one submission requests all bus gates to operate 24/7.

The proposed bus gates operational times are shown in the table below (Table 4-9 in the Preliminary Design Report, Supplementary Information):

Bus Gate No.	Location	Direction	Operational Times
1	Kimmage Road Lower Just north of the Ravensdale Park junction	Northbound	6am to 10am & 4pm to 8pm / 7 Days
		Southbound	6am to 10am & 4pm to 8pm / 7 Days
2	Kimmage Road Lower Just south of Harold's Cross Park	Northbound	24 Hours / 7 Days
		Southbound	24 Hours / 7 Days
3	Kimmage Road Lower Junction with Harold's Cross Road	Northbound	6am to 10am / 7 days
		Southbound	24 Hours / 7 Days
4	Kenilworth Park westbound at junction with Harold's Cross Road	Westbound	24 Hours / 7 Days

The Proposed Scheme is somewhat unusual in that there will be 3 bus gates along Kimmage Road Lower that will operate in combination with each other. The principal Bus Gate No.2 just south of Harold's Cross Park will provide the main control of general traffic to provide bus priority and low-flow traffic conditions for cyclists to share the road with a small amount of local traffic over a 2km length of the route. This bus gate will operate on a full-time basis, along with Bus Gate No.3 in the southbound direction. In this context, and to enable appropriate access for local traffic it is proposed that Bus Gate No.1 will operate during peak hours only. This will provide a balance between the desirable bus priority and the degree of traffic displacement onto other local roads. Similarly, Bus Gate No.3 will operate during peak hours only in the northbound direction so as to accommodate funeral traffic leaving from Mount Jerome Cemetery and to spread that traffic more evenly on the streets surrounding Harold's Cross Park.

Because of the proposed bus gates and their extensive operational hours the traffic environment along Kimmage Road Lower will be transformed into a "Low-Flow & Slow" context where cyclists can safely and comfortably share the road with a low volume of local access traffic, in accordance with the requirements of the *Cycle Design Manual*. In this context it is not necessary to provide segregated cycling facilities. In the Proposed Scheme the existing part-time cycle lanes that operate in the peak periods inbound in the morning and outbound in the evening will be mostly retained. However, if the bus gates were only to operate at peak periods on weekdays, then the traffic conditions for cyclists would not suit shared use of the road and segregated cycle tracks would be necessary, which would require widening into gardens along almost the full 2km length of Kimmage Road Lower.

In relation to the hours of operation for the southern bus gate in the evenings and the suggestion to open it to traffic at 7pm instead of 8pm, experience with the operation of part-time bus lanes in Dublin has shown that some drivers will delay their homeward trip in the evening to coincide with the end of restrictions at 7pm. Thus the evening peak traffic can extend beyond 7pm along such routes. Such an arrangement on Kimmage Road Lower could lead to an increase in traffic flows later into the evening, which would have a detrimental effect on cyclists using the route without the benefit of segregated cycle tracks.

5) Delays for Emergency Vehicles due to Bus Gates and Local Road Closures

Emergency Vehicles are permitted to pass through bus gates and will not be restricted on such routes. There are existing road closures at various places on the urban road network, such as two existing closures in Kimmage at Derravaragh Road and Mount Tallant Avenue. Emergency vehicle drivers and

despatchers will know of all such road closures and can plan their journeys to use appropriate alternative routes to minimise delay.

6) Scheme name is misleading as it does not go as far as the City Centre / Integration of Bus Routes F2 & 81 in the proposed Dublin City Centre Transport Management Plan

The Proposed Scheme will extend to the southern edge of the City Centre at the junction with Kevin Street. It will join the separate Tallaght-Clondalkin CBC Scheme at that junction which will continue the bus and cycling infrastructure improvements along Patrick Street and Nicholas Street to Christchurch at the western edge of the core city centre.

The Bus Network Redesign element of BusConnects is separate from the Proposed Scheme, which will provide the necessary infrastructure along Spine Route F between the Patrick Street / Kevin Street junction at the northern end and Kimmage Crossroads at the southern end. The Bus Network Redesign Map was updated in 2023 and is available on the BusConnects website: Network-Redesign-Map-2023.pdf (busconnects.ie). A snapshot of this map is shown below in Figure 2-4-4 for the southern part of the City Centre and approaches from the south. This shows that Bus Route F2 (along with F1 and F3) will turn east onto Kevin Street to enter the city centre at St. Stephen's Green, and then will proceed northwards along Dawson Street to College Green and O'Connell Street in the heart of the City Centre. Route 81 starts at Greenhills and will past eastwards through Kimmage Crossroads to Terenure, and onwards via Rathgar and Rathmines to enter the City Centre along Camden Street to Dame Street and College Green.

The Draft Dublin City Centre Transport Management Plan 2023 will not affect the proposed Bus Spine Route F coming from the southwest of the city to enter the core city centre at St. Stephen's Green and to connect northwards to O'Connell Street. The proposals for the city centre area are fully compatible with the Proposed Scheme for the Kimmage Core Bus Corridor on Spine Route F.

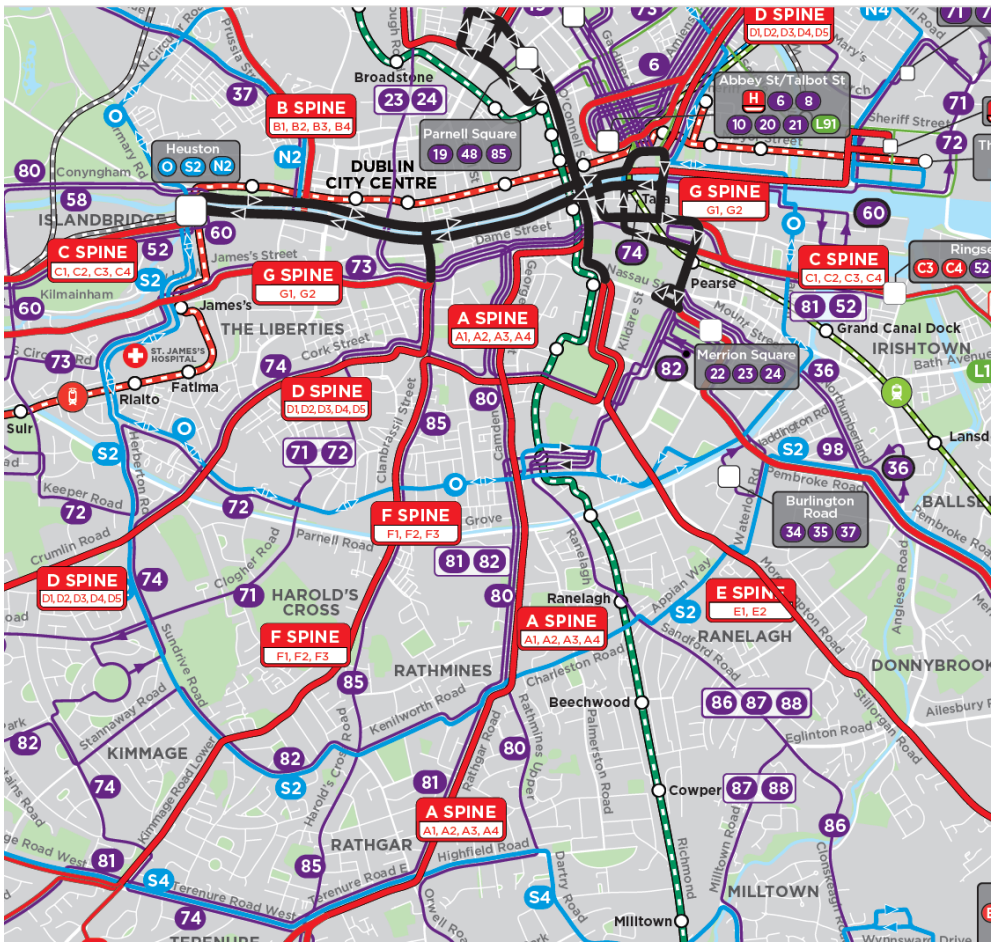


Figure 2-4-4: Bus Network Redesign on Southern Approach to the City Centre

Network-Redesign-Map-2023.pdf (busconnects.ie)

2.4.6 Cycling Facilities in General

Summary of issue raised:

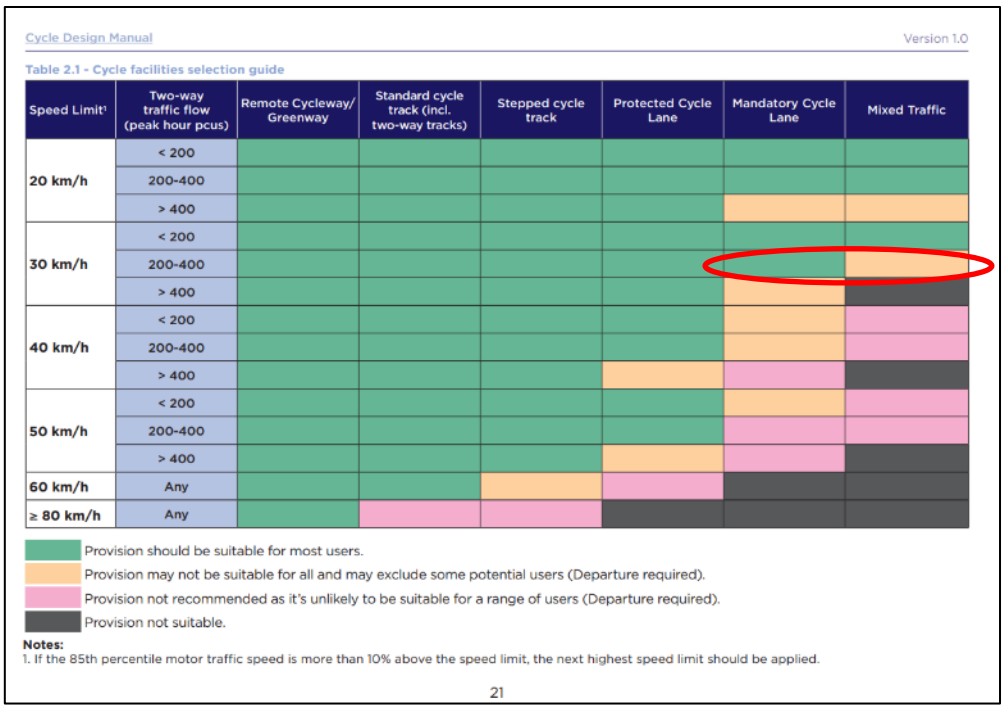
1) Limited Cycling Facilities along the CBC.
2) Higher quality and wider cycle tracks sought.
3) Signal priority for cyclists at junctions.
4) Distinctive surface treatment for cycle lanes and on quiet street cycle routes. Durability of red surfacing for advisory cycle lanes.
5) Camera-based enforcement of bus lanes and 30 km/h speed limits.

Responses to issues raised:

1) Limited Cycling Facilities Along the CBC.

One of the objectives of the Proposed Scheme outlined in Chapter 1, Introduction of Volume 2 of the EIAR, is to enhance the potential for cycling by providing safe infrastructure for cycling, segregated from general traffic wherever practicable.

Chapter 3 Consideration of Reasonable Alternatives, of Volume 2 of the EIAR, outlined the extensive options assessment exercise which has been undertaken to determine the Preferred Route. In constrained locations, a balanced approach has been taken in selecting the Preferred Route Option. Along a 2km length of the Proposed Scheme the proposed bus gates will transform the traffic condition such that segregated cycling facilities are not required because cyclists can share with mixed traffic in a low-flow and slow context within where the speed limit has been reduced to 30km/h, in accordance with the requirements of the Cycle Design Manual. This context fits in the boxes that are red-circled on Table 2.1 of the Cycle Design Manual as shown below, which confirms that the route will be suitable for most cyclists in Mixed Traffic, or for all cyclists with a Mandatory Cycle Lane. The existing arrangements on Kimmage Road Lower will be retained between the Bus Gates with part-time tidal cycle lanes in the peak direction. Cyclists will also have the choice of two parallel “quiet street” cycle routes through the filtered permeability routes along Derravaragh Road / Larkfield Grove / Priory Rod to the east, or Poddle Park / Blarney Park / Stone Boat Boardwalk / Mount Argus View to the west, both of which bypass the busiest area around the junction at Sundrive Road. In conclusion, Section 1 of the Proposed Scheme will provide a suitable range of route options for cyclists without the need for segregated cycle tracks between the proposed bus gates.



Cycle Design Manual — Version 1.0

Table 2.1 - Cycle facilities selection guide

Speed Limit[1]	Two-way traffic flow (peak hour pcus)	Remote Cycleway/ Greenway	Standard cycle track (incl. two-way tracks)	Stepped cycle track	Protected Cycle Lane	Mandatory Cycle Lane	Mixed Traffic
20 km/h	< 200						
	200-400						
	> 400						
30 km/h	< 200						
	200-400						
	> 400						
40 km/h	< 200						
	200-400						
	> 400						
50 km/h	< 200						
	200-400						
	> 400						
60 km/h	Any						
≥ 80 km/h	Any						

Provision should be suitable for most users.
Provision may not be suitable for all and may exclude some potential users (Departure required).
Provision not recommended as it's unlikely to be suitable for a range of users (Departure required).
Provision not suitable.

Notes:
1. If the 85th percentile motor traffic speed is more than 10% above the speed limit, the next highest speed limit should be applied.

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Apart from the section of the Core Bus Corridor between bus gates, as described above, along the rest of the Proposed Scheme continuous segregated cycle tracks will be provided. Table 4.1 of EIAR Chapter 4 Proposed Scheme Description provides a summary of changes as a result of the Proposed

Scheme with 1.75km of segregated cycling facilities, which will be a 100% increase in segregated facilities along this route.

2) Higher quality and wider cycle tracks sought.

Section 4.6.1 of the Chapter 4 of the EIAR outlines the cycling provision provided as part of the Proposed Scheme. The following is noted in relation to cycle track width:

> *"The desirable minimum width for a single direction, with flow, raised adjacent cycle track is 2.0m. Based on the National Cycle Manual (NCM) this allows for overtaking within the cycle track. The minimum width is 1.5m. The desirable width for a two-way cycle track is 3.25m with a 0.5m buffer between the cycle track and the carriageway."*

Where practicable, 2.0m wide cycle tracks have been provided along the route of the Proposed Scheme. It is acknowledged that due to significant constraints in available width along parts of the route of the Proposed Scheme, that in some locations, narrower cycling facilities are necessary. Section 4.11.5 of the Preliminary Design Report, in the Supplementary Information, further describes in detail cycling facilities at constrained areas along the proposed route. The locations where it has been necessary to provide narrow cycle tracks are listed in Appendix C of the Preliminary Design Report, Deviations / Departures / Relaxations from Standards, in the Supplementary Information.

An example of the context in which narrow cycle tracks are necessary is described for Harold's Cross Road in EIAR Volume 2, Chapter 4, Description of the Proposed Scheme, Section 4.5.2.1:

> *"New segregated 1.5m wide cycle tracks will be provided in both directions along R137 Harold's Cross Road. Wider 2m cycle tracks are not feasible in the constrained context of the street as described below."*
>
> *"To accommodate the proposed cycle tracks, road widening will be required of typically 2m over a length of 120m from the entrance to Our Lady's Hospice on the western side to the junction of Mount Drummond Avenue on the eastern side. There is a pinch-point between the hospice entrance and the gate of St. Clare's School on the opposite eastern side, where the distance between buildings is just 19m, and the public road width is 17.2m wide at the narrowest point. The proposed road cross-section will be 18m wide to include two 3m bus lanes, two 3m traffic lanes, two 2m footpaths and two 1.5m cycle tracks. Widening of approximately 0.8m will be required on the eastern side to achieve the 18m width."*
>
> *"The street width reduces to 18m at the junction of Armstrong Street, 60m south of the junction with the R111 on Parnell Road and Grove Road at the Grand Canal. It narrows further to less than 18m over the final 20m to the corner of R111 Parnell Road, where road widening is proposed with encroachment into the garden space at the Fottrell House office building on the south-western side of the junction."*

In summary, the 400m long section of Harold's Cross Road in Section 2 of the Proposed Scheme is especially narrow at both the southern and northern ends of the street, where some road widening into private properties will be necessary. It is not physically possible to provide 2m wide cycle tracks in the narrowest part of the street in the vicinity of Our Lady's Hospice and St. Clare's School where there are buildings at, or very close to the back of the footpaths. It was concluded in the design of the Proposed Scheme that it was necessary to limit the proposed cycle tracks to 1.5m along this section to fit within the spatial constraints and to minimise the encroachment into the gardens of houses. While 2m wide cycle tracks could perhaps be provided over a part of this route section, such localised widening would be inconsistent and possibly hazardous where it would narrow down again and force overtaking cyclists into single file again. It is better to transition to wider cycle tracks at a major junction rather than in mid-link. For a cyclist travelling at a typical speed of 15 km/h to 20 km/h, it would take less than 2 minutes to travel along the 400m length of this street, so that the constraint of single-file cycling will have minimal impact in terms of delay.

3) Signal Priority for Cyclists at Junctions

Details of the provisions for cyclists at signal-controlled junctions are described in the Supplementary Information, Preliminary Design Report, Section 5.3.2, with a general statement of principles at the beginning:

The provision for cyclists at junctions is a critical factor in managing conflict and providing safe junctions for all road users. The primary conflict for cyclists is with left turning traffic. Based on international best practice, the preferred layout for signalised junctions is the "Protected Junction", which provides physical kerb build outs to protect cyclists at junctions.

The Preliminary Design Report describes 4 different junction types that were considered for various locations along the Proposed Scheme, in common with the other 11 Core Bus Corridor Schemes across Dublin, and as are defined in EIAR Volume 4, Appendix 4.1, the Preliminary Design Guidance Booklet for BusConnects Core Bus Corridors.

The key factor in the choice of junction type is the proportion of left-turning traffic that would conflict with both bus and cyclist movements. Junction Type 1 is described as follows:

Junction Type 1, described at BCPDG Section 7.4.1 comprises a dedicated bus lane on both inbound and outbound direction continues up to the junction stop line. Due to space constraints, general traffic travelling both straight ahead and turning left is restricted to one lane. Junction Type 1 is typically chosen for the following reasons:

- *Volume of left turning vehicles greater than 100 PCUs per hour; and*
- *Urban setting, no space available for dedicated left turning lane / pocket.*

In this instance, mainline cyclists proceed with the bus phase while general traffic is held. The bus lane gets red, allowing the general traffic lane to proceed. If the volume of left-turning vehicles is greater than 150 PCUs (passenger car units), then the cyclists should also be held on red. If the volume of left turners is approx. 100 – 150 PCUs, left turners will be controlled by a flashing amber arrow and cyclists can proceed with general traffic, while also receiving an early start. See Figure 5-1.

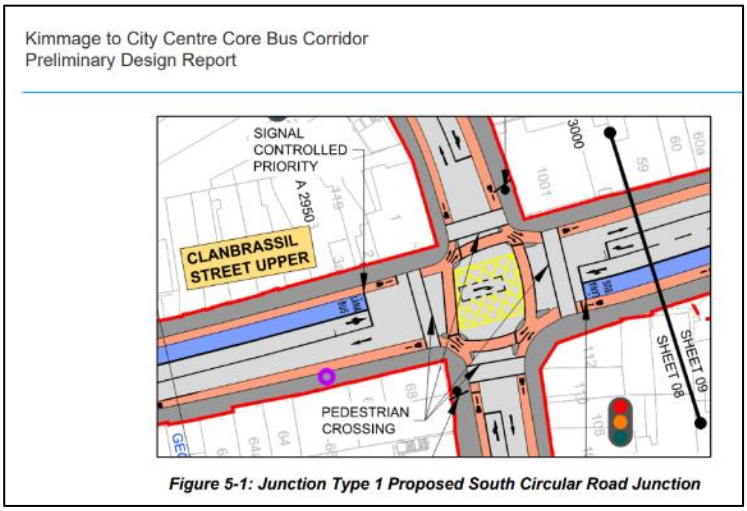

Figure 5-1: Junction Type 1 Proposed South Circular Road Junction

Junction Type 1 has been applied at all major junctions along the Proposed Scheme. Cyclists will receive priority over general traffic through three factors:

a) Early start signal (2 seconds)
b) Shared running with Bus Signal while general traffic is held.
c) Protected junction configuration where left-turning traffic must give way to cyclists across the junction.

4) Cycling Facility Surface Treatment

Some submissions suggest the need for interventions along the two proposed "quiet street" cycle routes to the east and west of Kimmage Road Lower with distinctive surface treatment and other measures. However, these local residential streets are already in a suitable condition for cyclists, as they are quite narrow, with no centreline road marking, speed control ramps at intervals, and on-street parking which all restrict traffic speeds to less than 30 km/h. No further interventions are necessary along these alternative cycle routes.

In the Supplementary Information, Preliminary Design Report, Section 7.3.2.3 says the following:

To improve legibility, it is proposed that all cycle tracks and cycle lanes are to have red coloured epoxy type surfacing, or red coloured asphalt, or similar in accordance with the National Cycle Manual.

While historically there have been various different types of red surfacing materials used on cycling facilities in Dublin, experience has proven that the epoxy-based materials used mainly by Dublin City Council have proven to be very durable and hard-wearing, and it is proposed to continue this practice for the BusConnects Core Bus Corridors. The existing cycle lanes on Kimmage Road Lower do not have red surfacing, but this will be provided in the Proposed Scheme.

Figure 2-4-3: Kimmage Road Lower Cycle Lanes (Google Earth)

Figure 2-4-4: Example of Cycle Lanes with Red Epoxy Surfacing

5) Camera-based enforcement of bus lanes and 30 km/h speed limits.

The NTA acknowledges the comments raised in relation to camera enforcement. Whilst enforcement for the lawful use of bus lanes is currently a matter for An Garda Síochána, the NTA is separately exploring proposals and methods for bus lane enforcement as set out under Measure INT24 – Enforcement of Road Traffic Laws of the Greater Dublin Area Transport Strategy 2022-2042.

With the State having incurred the very large expenditure required to deliver the BusConnects Programme, it is vital to ensure that sufficient enforcement is in place such that the benefits of that investment are not eroded by widespread breaches of the restrictions applying to bus lanes, cycle tracks and junctions. To effectively ensure this outcome, camera-based enforcement will be required to augment the on-street activities of An Garda Siochana.

This type of arrangement is in place in many jurisdictions internationally, where camera detection of certain breaches of regulations is linked to the automatic issue of fixed penalty notices.

Action 67 in the Road Safety Strategy Phase 1 Action Plan 2021–2024 sets out the need to "further develop camera-based enforcement by the Gardaí, including at junctions and for management of bus/cycle lanes, building on existing and recent legislation through establishing suitable cross-agency administrative arrangements; and, where any legislative issues are identified, to consider and develop agreed proposals to remedy them."

The Department of Transport has requested the National Transport Authority (NTA) to undertake the first phase of this action, namely, to establish and chair a working group to explore this action and to

bring forward recommendations on how it should be progressed. The subsequent steps for implementation, including addressing any legislative issues that may be identified, will be determined by the Department of Transport subsequent to the initial phase. It is expected that the report of the Working Group will be finalised and provided to the Department later this year.

Notwithstanding this, specific measures have been considered in the development of the Proposed Scheme that will help deter inappropriate and unlawful use of bus lanes including advanced bus signal detection systems which will activate green signals at traffic lights for authorised vehicles only.

2.5 Section 1 Proposals

Summary of issue raised:

1) Lower 30 km/h speed limit on Kimmage Road Lower welcomed by many submissions. Can lower speed limit be implemented sooner? Need for traffic calming to complement 30 km/h speed limit and enforcement cameras.

Pedestrians

2) Additional pedestrian crossings requested on Kimmage Road Lower in vicinity of Aideen Avenue, and Kenilworth Park / Westfield Road.
3) Pedestrian crossing on Kimmage Road Lower at McGowan's pub proposed under separate planning permission for new local schools.
4) Objections to proposals to widen road and remove footpath at southern end of Harold's Cross Park. On route to bus stops when park is closed in the evening. Need for raised platforms across the junction at the western end and the wide crossing of side street at Shamrock Villas on southern side of the road.
5) Request for safe pedestrian crossing at Kenilworth Park down Wilfrid Road on walking route towards schools in Harold's Cross.

Cyclists

6) Parking prioritised over cycle lanes south of Sundrive Cross.
7) Stone Boat Boardwalk and cycle route through residential estate. Objected to by 8 submissions, welcomed in 1 submission, with reservations and queries in 5 submissions. Security risk and anti-social behaviour / Cycle route on narrow residential road with 3 sharp bends / Alternative cycle route through Eamonn Ceannt Park / Query about the benefits as no shorter than through Sundrive Cross / Wildlife along River Poddle. Some people welcome the Stone Boat link if it continued through Mount Argus.
8) Safety of cycle route on Sundrive Road.
9) How do northbound cyclists cross the road to the school on east side of Harold's Cross Road?
10) Harold's Cross Road south of the park needs improvements for pedestrians and cyclists.

Public Realm

11) Median island with trees on Kimmage Road Lower at Corrib Road is unnecessary.
12) Planters instead of bollards at road closures.
13) Support for public realm improvements / Comments on specific aspects of the proposals at Sundrive Cross. Curtailed public realm south of Sundrive Cross regretted by several submissions.
14) Objections to proposals to widen road and remove footpath at southern end of Harold's Cross Park. Impact for setting of park. Granite kerb stones.
15) More public realm improvements requested in Harold's Cross Village.
16) Street furniture requested.

Parking

17) Why is more parking required on LKR south of Sundrive with removal of cycle lanes. Parking on west side of KRL at Sundrive is private and EIAR Chapter 6 is incorrect.
18) Car park at Sundrive Road and proposed cycle route link: Interaction between cyclists and pedestrians on the Poddle Cycleway with car parking and interference with access to rear of properties. / Access for maintenance and repair of the property and advertising hoarding. / Future redevelopment impacts. / Construction compound restrictions for access. / Loss of 8 public car spaces.
19) Categorisation of off-street parking spaces on west side of Kimmage Road.

Other Design Issues

20) KCR Junction: Left-slip lane SB necessary for No.74 bus / some right-turns dangerous.

21) Platforms at junctions with side streets missing.
22) Practicality of bus shelters on narrow footpaths (2440 Aideen Avenue, 2391 Priory Road, 2390 Kenilworth Park).
23) Raised paving and road markings not to impede access to laneway to rear of 126 to 136 Kimmage Road Lower.
24) Drainage problems at the junction of Rathgar Avenue and Harold's Cross Road.

Local Traffic Impacts

25) 4 bus gates proposed should be reduced to 1 only at Harold's Cross Park.
26) "White listing" for local traffic to pass through bus gates.
27) Diversion of traffic with longer local trips.
28) Objection to road closure at junction of Corrib Road with Derravaragh Road.
29) Opposition to closure of Poddle Park to traffic.
30) Southern bus gate should operate only 5 days rather than 7 days a week, with shorter hours.
31) Restriction for Left-turn eastbound from Sundrive Road to Kimmage Road Lower.
32) More traffic on Clareville Road & schools.
33) Social equity of road closures for local community to access to various amenities and businesses.
34) Alternative routes for local traffic and need for further modal filters.
35) Commercial impacts for Kimmage Village.
36) Delivery routes for businesses and bin lorries between bus gates.
37) Traffic restriction at Kenilworth Park East onto Harold's Cross Road.
38) Traffic diversion to Rathgar Avenue by Bus Gate No.4 at Kenilworth Square.
39) Traffic impacts for Stannaway Road and other streets west of CBC.
40) Access to Mount Argus Church
41) Access to Mount Jerome Cemetery.
42) Operational hours of the most northerly bus gate in Harold's Cross.

Responses to issues raised:

1) 30 km/h Speed Limit

The NTA acknowledges the comments raised in relation to enforcement. Enforcement of road traffic laws is a matter for An Garda Síochána.

There are a number of traffic calming measures that have been implemented in the Proposed Scheme that will reduce speeds including improved junction layouts with reduced corner radii, narrow carriageway lane widths, raised table crossings on side roads. The additional landscaping and enhanced pedestrian/ cyclist priority measures along the Proposed Scheme will also lend themselves to the principles of self-regulating streets as set out in DMURS to encourage lower driving speeds.

With respect to adoption of speed limit changes, the NTA will continue with the very positive and constructive liaison with local authorities to ensure that speed limit changes as proposed are adopted.

Pedestrians

2) Additional pedestrian crossings requested on Kimmage Road Lower in vicinity of Aideen Avenue, and Kenilworth Park / Westfield Road.

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

It is noted that the additional pedestrian crossing on Kimmage Road Lower in the vicinity of Aideen Avenue, and Kenilworth Park/Westfield Road are both in low speed, low flow context within bus gates. Therefore, there is no need for additional controlled pedestrian crossings as in the Proposed Scheme

it will become much easier to cross Kimmage Road Lower when the general traffic volume will be much reduced.

3) A new pedestrian crossing on Kimmage Road Lower at McGowan's pub is proposed under separate planning permission for new local schools.

The NTA notes this information. With the large reduction in traffic that will arise due to the bus gate at this location in the Proposed Scheme, the need for a signal-controlled pedestrian crossing will be removed.

4) Objections to proposals to widen road and remove footpath at southern end of Harold's Cross Park.

This is on the route to bus stops when park is closed in the evening. Need for raised platforms across the junction at the western end and the wide crossing of side street at Shamrock Villas on southern side of the road.

In the Proposed Scheme this short link street will be widened on the northern side to accommodate two-way traffic properly, alongside the retention of existing on-street parking for the houses on the southern side. The widening will require removal of the existing footpath along the northern side of the road adjacent to the park. The alternative option of removing the existing parking on the southern side of the street would adversely affect the amenity of the residents of the period houses, most of which do not have driveways for off-street parking, in a context where there is a general severe lack of alternative parking available in the area.

This section of street carries a very small flow of traffic at present, but that will increase slightly due to the proposed bus gate on Kimmage Road Lower at the northern end of the park, which will divert local access traffic around the southern end of the park towards Mount Jerome Cemetery, Mount Argus Road, and homes opposite the western side of the park. NTA accepts the suggestion that an improved pedestrian crossing could be provided at the junction at the western end of the link street where it joins Kimmage Road Lower, with a raised platform which would operate as a "courtesy crossing" as described in the *Design Manual for Urban Roads and Streets (DMURS).*

5) Request for safe pedestrian crossing at Kenilworth Park down Wilfrid Road on walking route towards schools in Harold's Cross.

This matter can be addressed separately by Dublin City Council as it is not affected by the Proposed Scheme.

Cyclists

6) Parking prioritised over cycle lanes south of Sundrive Cross.

On Kimmage Road Lower south of the Sundrive Cross there is a row of 22 houses on the eastern side of the road that do not have driveways. It is proposed to provide 16 spaces on that side of the road. This proposal will replace the existing part-time on-street parking. The advisory cycle lanes will be removed over this 150m long section of road.

Cyclists will share the 3.0m wide traffic lane with a greatly reduced volume of traffic in a low speed 30km/h environment, which is consistent with the provisions of the Cycle Design Manual. An alternative cycle route is also proposed in parallel to Kimmage Road Lower, along Poddle Park, Bangor Road, and Blarney Park to Sundrive Road. This route along local residential streets will require no changes to the existing road layout north of the junction of Poddle Park and Ravensdale Park which will be closed to through traffic. That traffic restriction will greatly reduce the volume of traffic on the proposed cycle route.

7) Stone Boat Boardwalk and cycle route through residential estate.

Objected to by 8 submissions, welcomed in 1 submission, with reservations and queries in 5 submissions. Security risk and anti-social behaviour / Cycle route on narrow residential road with 3 sharp bends / Alternative cycle route through Eamonn Ceannt Park / Query about the benefits as no

shorter than through Sundrive Cross / Wildlife along River Poddle. Some people welcome the Stone Boat link if it continued through Mount Argus.

The proposed new pedestrian and cycle link from Mount Argus Way to Sundrive Road along the course of the River Poddle will provide a new and direct link for the community in Mount Argus to walk or cycle more quickly to the heart of Kimmage Village and the shopping centre. It will also shorten the distance from the residential community along Sundrive Road to Mount Argus Church. The existing walking distance from the junction of Mount Argus Way / Mount Argus Avenue to Kimmage Shopping Centre via Kimmage Road Lower is 400m. The more direct route along the Stone Boat Boardwalk will be 220m. For someone living in Mount Argus Square the distance will reduce from 500m to only 120m. Section 10.2.1 of the EIAR Chapter 10 Population, and Appendix A10.2 to Chapter 10, assess the Economic impact of the Core Bus Corridors, which includes consideration of the impact of transport infrastructure on criminal activity. The conclusion reached on page 25 of Appendix A10.2 is that *'the new infrastructure improvements should have a direct and immediate impact on crime along the corridors. It will provide better, safer and more visible bus stops whilst also improving the wider public realm infrastructure through investments such as improved street lighting. This will act as a direct deterrent to criminal activity and result in a reduction in crime. This is turn has been shown to encourage people onto the streets into the evening which will also support the night time economy in community centres'.*

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

- *Good infrastructure has also been shown to have a positive impact on levels of crime, particularly low level crimes such as theft and vandalism. There is evidence from a wide range of studies that redesigned public realm, especially those which are better lit and more visible, see significant reductions in the level of crime*

The local residents in the Mount Argus estate will benefit from greatly increased permeability on this more convenient and direct access route to their local shops and services. Likewise there will be more direct connectivity for the community living further north along Mount Argus Road who already walk through the grounds of the church and the public park on their way to Kimmage Village. In the other direction, the community along Sundrive Road and the area to the south at Blarney Park, Tonguefield Road and Bangor Road, etc., will have a more direct and quiet walking route to the local park and church at Mount Argus. These benefits will ensure that the proposed new route will be busy with local residents walking back and forth, which will provide passive security for the people living alongside the proposed new link.

The alignment of the proposed new walking and cycling route is straight, with clear visibility along the full route. There is overlooking of the northern end of the route from the homes at Mount Argus Square, and the southern part through the car park to Sundrive Road is only 40m long. Opening up of the through link should actually increase security for the businesses adjoining the car park at the southern end of the route, and for the residents of Mount Argus Square, Mount Argus Close and Mount Argus Way by increasing passive surveillance due to the regular movement of people back and forth along the new route. In this context there should be no concerns about security or of a risk of anti-social behaviour on the proposed new link.

The roads in the Mount Argus estate are well laid out with short straight sections and regular sharp bends and junctions to branch streets acting as traffic management measures to reduce traffic speeds through the estate. In this respect, the road network within the estate complies with the recommendations of the *Design Manual for Urban Roads and Streets (DMURS)* for providing a safe environment for the residents and people walking and cycling in the area. The estate is an ideal route for cyclists of all abilities and ages to safely share the road with slow residential traffic as is illustrated on Figure 2-2-6.

Similarly, the former National Cycle Manual (applicable at the time of submission) and the current Cycle Design Manual both advocate the use of low-trafficked neighbourhoods as an *"effective way of delivering a dense network of quiet streets in urban areas without the need for protected cycle infrastructure. These quiet streets can provide the basic level of a cycle network… to enable local cycling trips and provide connections to the surrounding cycle network. They can also form important*

parts of higher level routes in the cycle network e.g. a secondary route may traverse through a low traffic neighbourhood to provide a connection to cycle tracks on boundary roads". This cycle route has been identified as a feeder route within the 2022 Greater Dublin Area Cycle Network Plan based on the low traffic volumes and low traffic speeds through the estate.

The proposed scheme will retain the advisory cycle lanes along Kimmage Road Lower north of the junction with Sundrive Road / Larkfield Avenue. Some of the traffic diverted away from Kimmage Road Lower at the bus gate introduced at Ravensdale Park will come to the Sundrive Road junction with the potential to create a somewhat hostile environment particularly for young children and vulnerable cyclists. In the *Greater Dublin Area Cycle Network Plan* (Figure 2-5-1) the route along the Stone Boat and through Mount Argus is indicated as a feeder link from Sundrive Road to the secondary route along Kimmage Road Lower that in turn connects with the primary route at Harold's Cross Road. While the feeder cycle route through Mount Argus may not be shorter than the alternative route along the main roads through Sundrive Cross, it will allow cyclists to bypass that busy junction, and will be a quieter and more attractive route for cyclists of all ages and abilities.

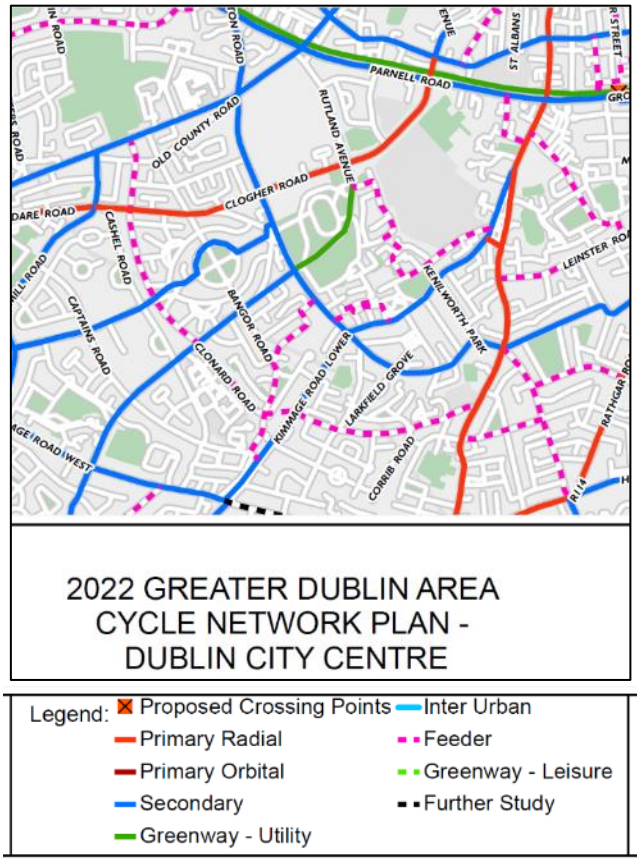

Figure 2-5-1: Greater Dublin Area Cycle Network Plan in Kimmage Area

8) Safety of cycle route on Sundrive Road.

In the Proposed Scheme segregated cycle tracks will be provided along a length of 200m along Sundrive Road between the junctions with Blarney Park and Kimmage Road Lower. The proposed cycle tracks will be separated from traffic by a raised kerb which will be lowered as necessary for traffic to cross for access to driveways and parking areas. The kerb segregation will enhance safety for cyclists in the cycle tracks.

9) How do northbound cyclists cross the road to the school on the east side of Harold's Cross Road?

The entrance to the new schools at the former Harold's Cross Greyhound track is located 100m north of the junction at Parkview Avenue where there is a signal-controlled pedestrian crossing. Northbound cyclists can cross Harold's Cross Road at that junction, and they can then dismount and walk the short distance to the school entrance. As there is no footpath on the western side of Harold's Cross Road

opposite the school, it would not be possible to provide a signal-controlled crossing for northbound cyclists directly at the school entrance.

10) Harold's Cross Road south of the park needs improvements for pedestrians and cyclists.

The entrance to the new schools at the former Harold's Cross Greyhound track is located 100m north of the junction at Parkview Avenue where there is a signal-controlled pedestrian crossing. Northbound cyclists can cross Harold's Cross Road at that junction, and they can then dismount and walk the short distance to the school entrance. As there is no footpath on the western side of Harold's Cross Road opposite the school, it would not be possible to provide a signal-controlled crossing for northbound cyclists directly at the school entrance.

Public Realm

11) Median island with trees on Kimmage Road Lower at Corrib Road is unnecessary.

It is an objective of the Proposed Scheme to ensure that the public realm is carefully considered in the design and development of the transport infrastructure and seek to enhance key urban focal points where appropriate and feasible.

Public realm improvements are proposed at the focal point near the southern end of Kimmage Road Lower where there is a cluster of shops at the Corrib Road junction. The existing road carriageway is 13m wide along this section. In the middle of the road a 2m wide median island will be provided on which 14 new street trees will be planted.

The existing road at this location is wider than necessary, which will encourage higher traffic speeds. The proposed median island will have a traffic calming effect to assist with compliance with the proposed 30 km/h speed limit. The new trees will greatly enhance the street landscape with a significant greening effect in an area with few existing street trees.

12) Planters instead of bollards at road closures.

The NTA recognises the potential to enhance the streetscape at both the new and existing traffic closures on residential streets where filtered permeability will be provided for cyclists. A typical existing arrangement at such a location is shown in Figure 2-5-2. The closure consists of a concrete footpath and bollards across the original road, without a gap for cyclists to pass through.

Figure 2-5-2: Existing Road Closure at Derravaragh Road / Neagh Road (Google Earth)

In the proposed scheme the existing road closure will be enhanced with an oak tree planted in the centre, and a pair of cycle tracks provided through the barrier. The proposed new road closure a short distance to the south at Corrib Road will be landscaped with 6 new street trees placed around the split bicycle gate. These proposals are shown on General Arrangement Sheet 13 (EIAR Volume 3 Figures, Part 2) and in Landscaping and Urban Realm Sheet 13 (EIAR Volume 3 Figures, Part 5).

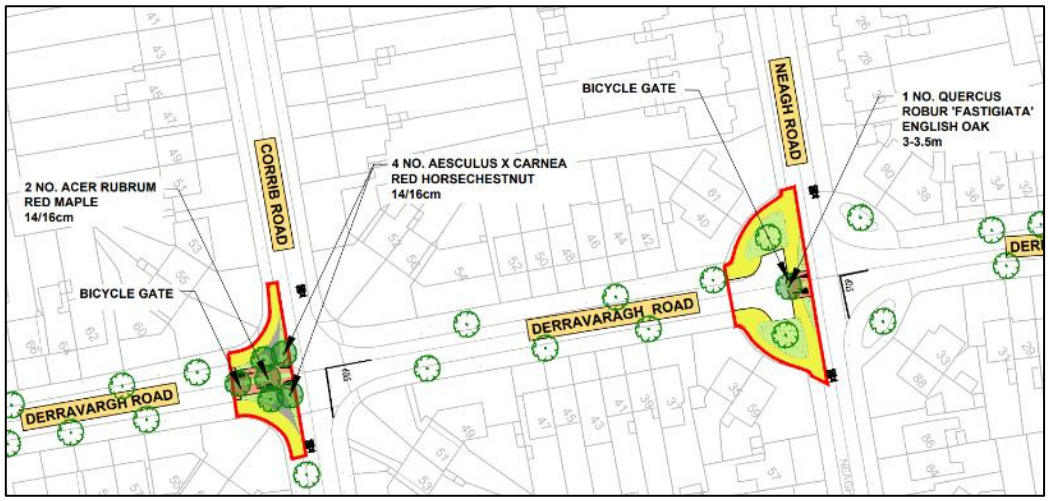

Figure 2-5-3: Proposed Road Closures at Derravaragh Road

13) Support for public realm improvements / Comments on specific aspects of the proposals at Sundrive Cross. Curtailed public realm south of Sundrive Cross regretted by several submissions.

In the development of the Proposed Scheme the scope for public realm in Kimmage Village was explored through the various non-statutory public consultations. Early proposals considered the possibilities along the western side of Kimmage Road Lower where there is a row of shops and businesses extending southwards from the junction with Sundrive Road. However, this area is private property behind the 2m wide public footpath and any public realm works would require the agreement of the property owners which was not forthcoming. The final scheme proposals will provide a major improvement of the public realm generally in Kimmage Village within the extents of the public road areas over a length of 200m along Kimmage Road Lower in the north-south direction, and for 100m in the east-west direction from Larkfield Avenue along Sundrive Road to Kimmage Shopping Centre. NTA is satisfied that the ambitious public realm proposals in Kimmage Village will make a major improvement in the amenity of the village for the local community.

14) Objections to proposals to widen road and remove footpath at southern end of Harold's Cross Park. Impact for setting of park. Granite kerb stones.

The need for the proposed modifications to the street layout at this location has been explained earlier under Issue No.4 in this section. The boundary wall and railing at the southern end of Harold's Cross Park will not be affected by the proposed alterations, which will look similar to the existing arrangement along the eastern boundary.

The granite kerb stones will be reused along the base of the park boundary wall to provide a narrow edge strip that will prevent vehicles from touching the boundary wall and railing.

15) More public realm improvements requested in Harold's Cross Village.

Harold's Cross Village is outside of the extents of the Proposed Scheme which does not include Harold's Cross Road south of the park (apart from localised traffic layout modifications at the junction with Kenilworth Park). Dublin City Council may separately consider a public realm improvement scheme for Harold's Cross Village.

16) Street furniture requested.

Generally the footpaths along the extents of the Proposed Scheme are not wide enough to accommodate much street furniture other than essential signs and lamp posts. Where there is more space such as at Kimmage Village, the Proposed Scheme will provide new street furniture to an appropriate degree. This is illustrated in Figure 2-5-4 (from EIAR Volume 3 Figures, Part 5, Sheet 3) which shows a proposed rest area with planters on the northwest corner of the junction at Sundrive

Road which is a sunny spot with a generously wide footpath area. The existing layout at this location was recently modified by Dublin City Council to extend the footpath with the removal of a small parking area. NTA understands that this parking is of particular use for customers of Thom's Pharmacy a short distance to the north, which is why it was shown to be retained in the Proposed Scheme.

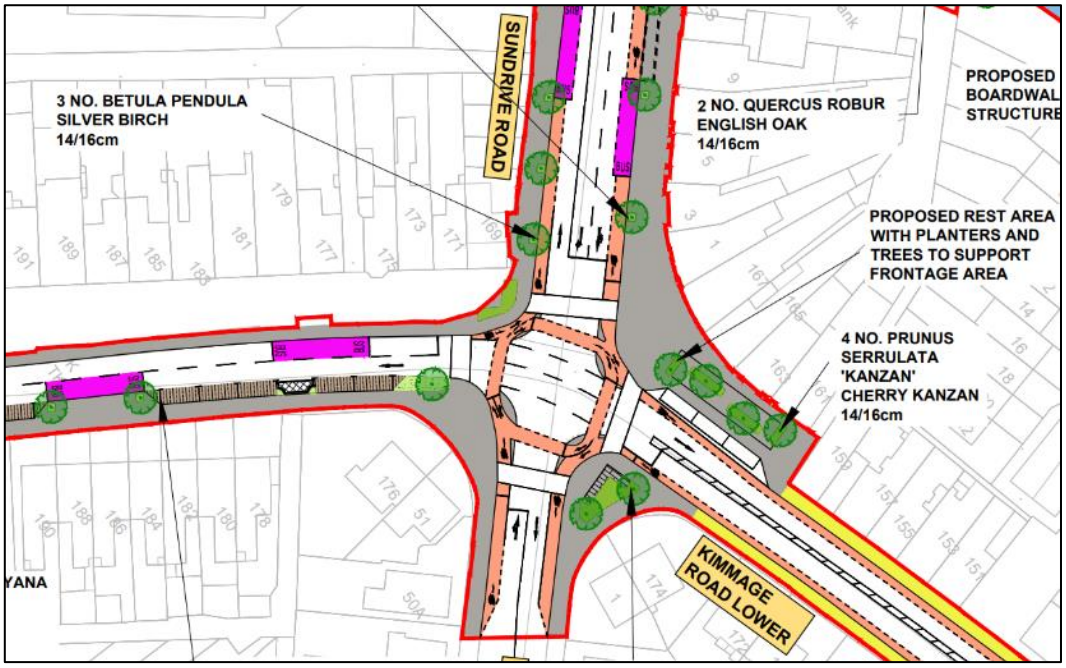

Figure 2-5-4: Proposed Public Realm Improvements at Kimmage Village

Parking

17) Why is more parking required on LKR south of Sundrive with removal of cycle lanes? Parking on west side of KRL at Sundrive is private and EIAR Chapter 6 is incorrect.

On Kimmage Road Lower south of the Sundrive Cross there is a row of 22 houses on the eastern side of the road that do not have driveways. In the non-statutory consultations NTA was made aware of the difficulties for the residents on this part of Kimmage Road Lower who need to move their vehicles from place to place at various times of day to adhere to on-street parking restrictions. The existing parking behind the public footpath on the opposite western side of the street was described as "permit Parking" in EIAR Volume 2, Chapter 6 Traffic & Transportation, which was not correct, as that parking is on private landing areas and is not available to the general public. In the Proposed Scheme it is proposed to provide 16 new public full-time parking spaces on the eastern side of the road to accommodate the local residents in the centre of the village where public parking is in short supply. This proposal will replace the existing part-time on-street parking. The advisory cycle lanes will be removed over this 150m long section of road. Cyclists will share the 6m wide road with a much-reduced volume of traffic in a low-speed 30km/h environment, which is appropriate in accordance with the *Cycle Design Manual*.

18) Car park at Sundrive Road and proposed cycle route link: Interaction between cyclists and pedestrians on the Poddle Cycleway with car parking and interference with access to rear of properties. / Access for maintenance and repair of the property and advertising hoarding. / Future redevelopment impacts. / Construction compound restrictions for access. / Loss of 8 public car spaces.

a) Interaction between cyclists and pedestrians in the car park

Pedestrians and cyclists on the *Poddle Way* route via the proposed Stone Boat Boardwalk will share the car park access aisle with vehicular movements to the car parking spaces and the access to the rear of the adjoining properties. Such vehicular movements are very occasional and there will be minimal interference caused by the mixing with pedestrians and cyclists in a safe and slow-moving situation.

b) Access for maintenance and repair of the property and advertising hoarding.

The Proposed Scheme will not interfere with the existing access for maintenance and repair of the adjoining properties and of the advertising hoarding on the eastern side. In this respect these activities can take place as normal with suitable public safety measures and precautions and will be no different to the situation at the front of the properties on the public footpath along Sundrive Road.

c) Future redevelopment impacts.

If the adjoining sites were to be further developed, this could require access for construction and scaffolding from the adjoining car park area. Such arrangements would be subject to normal licencing by the local authority and would require provisions for public safety, including possible temporary restriction of some of the parking spaces. The same requirements pertain at present, and the Proposed Scheme will make no practical difference in this regard.

d) Construction Compound and Possible Restrictions for Access to Properties

The Proposed Scheme will not interfere with the existing access for maintenance and repair of the adjoining properties and of the advertising hoarding on the eastern side. In this respect these activities can take place as normal with suitable public safety measures and precautions and will be no different to the situation at the front of the properties on the public footpath along Sundrive Road.

Section 5.5.3.2 in Chapter 5 in Volume 2 of the EIAR addresses access to property during construction:

> *"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…."*

In addition, the appointed contractor will be required to put in place a Communications Plan in accordance with the NTA's requirements to inform the public (and affected properties) in advance of construction works of a disruptive nature. Section 5.1.6 in the Construction Environmental Management Plan (CEMP) in Appendix A5.1 in Volume 4 of the EIAR states:

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

e) Loss of 8 public car spaces.

The existing delineated 5 parallel spaces along the eastern side of this car park are not practical to use as the residual circulation aisle is less than 3m wide, which is much too narrow for a vehicle to enter or exit the perpendicular space if there is a car parked in the opposite parallel space. The effective number of parking spaces is therefore 15. The net effect of the Proposed Scheme will be to reduce the number of parking spaces from 15 to 12 (9 public spaces + 3 taxi spaces), resulting in a net loss of 3 spaces overall, rather than 8 as stated in this submission. EIAR Volume 2 Chapter 6 Traffic & Transport provides an assessment of the impact of the Proposed Scheme for parking at this location in Section 6.4.6.1.2.4 as having a Negative, Slight and Long-Term effect.

19) Categorisation of 52 off-street parking spaces on the west side of Kimmage Road Lower

EIAR Chapter 6 (6.4.6.1.2.4) incorrectly describes 52 off-street parking spaces on west side of Kimmage Road Lower south of Sundrive Road as "permit parking". These are private parking spaces on the landing areas in front of the row of shops and businesses. For context at this location the EIAR notes that the residential properties on the eastern side of the street at this location have rear access

with off-street parking, which applies to some of those properties, but not all of them. This aspect of the EIAR provides context for the inclusion in the Proposed Scheme of the provision of 16 new full-time on-street parking spaces along the eastern side of Kimmage Road Lower to improve the availability of parking for the local residential community who do not have off-street parking.

Other Design Issues

20) Kimmage Crossroads Junction: Left-slip lane southbound is necessary for No.74 bus / some right-turns dangerous.

The Proposed Scheme design provides suitable corner radii for all vehicles to turn left, including buses. It may be seen on the General Arrangement Drawing Sheet No.1 (EIAR Volume 3 Figures. Part 2) that on Terenure Road West the stop line for the westbound right-turn lane is set back further than the straight-ahead lane, which is to accommodate the over-sweep of a large vehicle turning left from Kimmage Road Lower.

While the specific right-turn movement is not described in the relevant submission, it is presumably the northbound right-turn from Fortfield Road. Few vehicles turn right from the south at this junction because there is a more direct route towards Terenure via Greenlea Road to the east. Presently a right-turning vehicle must perch in the middle of the junction and make an opposed turn without a filter signal. In the Proposed Scheme the north-south movements will be separated in the signal staging which will make an easier right-turn from Fortfield Road. This modification will be made in the context of much reduced north-south traffic due to the nearby bus gate on Kimmage Road Lower, and to allow southbound buses to turn right from the bus lane on the left onto Kimmage Road West separate from the general traffic movements, with the southbound right-turn lane removed.

21) Platforms at junctions with side streets

In the section of the route between the bus gates it is unnecessary to modify the minor junctions at side streets because Kimmage Road Lower will no longer be a main traffic route.

22) Practicality of bus shelters on narrow footpaths

There is a specific type of cantilever bus shelter that is designed to be used where footpaths are narrow, as will be the case at several bus stops along Kimmage Road Lower. The existing bus stop No.2443 is an example as shown in Figure 2-5-5.

Figure 2-5-5: Existing Bus Stop No.2443 on Kimmage Road Lower (Google Earth)

23) Raised paving and road markings and signs not to impede access to laneway to rear of 126 to 136Kimmage Road Lower.

These houses are located on the eastern side of the road opposite and a little north of the junction at Mount Argus View. In the Proposed Scheme a short section of segregated southbound cycle track will be provided at this junction where the existing road is very wide, and the right-turn lane will be removed and replaced with a dedicated right-turn facility for cyclists. As shown in Figure 2-5-6 there is a gap in the traffic island provided at the laneway, plus a yellow box to ensure clear access.

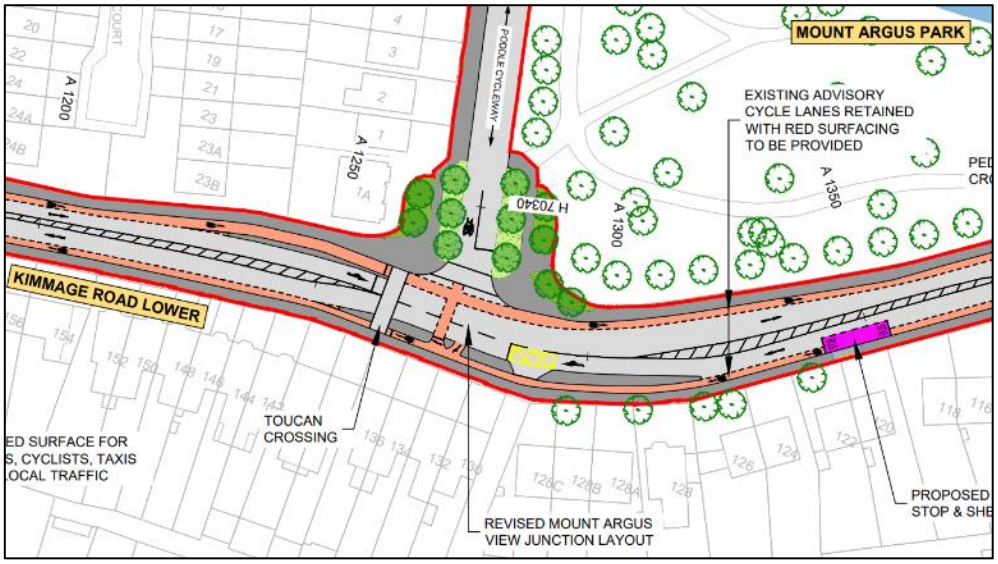

Figure 2-5-6: Proposed Scheme at 126 to 136 Kimmage Road Lower

24) Drainage problems at the junction of Rathgar Avenue and Harold's Cross Road

In the Proposed Scheme at this junction the drainage issues described can be rectified.

Local Traffic Impacts

25) The 4 bus gates proposed should be reduced to 1 only at Harold's Cross Park.

Each of the proposed bus gates is necessary for a specific local purpose.

Bus Gate No.2 on Kimmage Road Lower at the southern end of Harold's Cross Park will provide the primary control on the core bus corridor in terms of restricting general traffic to a small volume for local access only on a 24-hour / 7-day per week basis, which is essential to ensure suitable conditions for cyclists to share the Kimmage Road Lower in mixed traffic without segregated facilities. The southern Bus Gate No.1 at Ravensdale Park will control the traffic volume along the southern part of the corridor and will avoid the diversion of a large volume of traffic eastwards along Clareville Road past the primary schools at peak times. The most northerly Bus Gate No.3 at the junction of Kimmage Road Lower and Harold's Cross will divert southbound traffic away from Kimmage Road Lower at the most suitable interception point. In the northbound direction it will operate in the morning peak to avoid some traffic leaking around the western side of Harold's Cross Park to avoid delay on Harold's Cross Road. Bus Gate No. 4 at Kenilworth Square North is necessary to enable the junction on Harold's Cross Road to operate more efficiently and to accommodate the introduction of a southbound right-turn. It would not be appropriate therefore to reduce the number of proposed bus gates.

26) "White listing" for local traffic to pass through bus gates.

It is not legally possible in Ireland to provide an exemption for some general traffic at a traffic restriction.

27) Diversion of traffic onto local residential roads & longer local trips

It is acknowledged that the Proposed Scheme will give rise to increased journey distances by car for some local trips, but this is necessary to achieve the necessary bus priority and for safe cycling conditions along Kimmage Road Lower. Some traffic will divert westward into the Kimmage/Crumlin residential area along Lorcan O'Toole Park and Stannaway Road and adjoining streets. This is confirmed in the EIAR Volume 2, Chapter 6 Traffic & Transport which provides details of the expected changes in traffic flows on the surrounding road network.

28) Objections to road closure at junction of Corrib Road with Derravaragh Road.

For Corrib Road residents there will be only 1 access route from Kimmage Road Lower and some people are concerned about potential traffic congestion at the junction with Kimmage Road Lower. There will be a longer diversion route going south, with impact for the local shops. Would turn restrictions at Terenure Road West instead not provide the required effect.

If Derravaragh Road were not closed at the southern side of the junction with Corrib Road there would be a significant risk of through traffic bypassing the bus gate on Kimmage Road Lower which would severely impact on the local community. Turning restrictions at Terenure Road West is not a suitable or practicable alternative option as this would be difficult to enforce, and it would similarly restrict access for the local community if effective. In any event through traffic could circumvent such a restriction by entering Hazelbrook Road just north of Kimmage Crossroads to reach Derravaragh Road and Corrib Road to bypass the bus gate. There is precedence in the area for such road closures which are in place nearby at Neagh Road and Mount Tallant Avenue.

29) Opposition to closure of Poddle Park to traffic.

The same issues apply on Poddle Park as on Corrib Road, and the road closure is necessary to avoid through traffic diverting from Kimmage Road Lower onto this parallel street.

30) Social equity of road closures for local community to access to various amenities and businesses.

This comment relates to the proposal to restrict traffic at Poddle Park which would impact some of the community to the west of the Proposed Scheme. In this respect there will be a degree of parity across the wider community as there will be traffic restrictions on local streets both to the east and west of Kimmage Road Lower, as necessary to protect the amenity of the local community from the impact of diverted through traffic where possible and appropriate.

Section 10.6.2 (Table 10.13) in Chapter 10 in Volume 2 of the EIAR provides a summary of the operational phase community accessibility impacts.

31) No mitigation proposals for Stannaway Road and other local streets west of CBC where traffic will increase, with delays for proposed new No.82 bus.

EIAR Volume 2, Chapter 6 Traffic & Transport indicates in Table 6-50 that two-way traffic on Stannaway Road will increase by 253 PCUs per hour in the morning peak with **a negative, slight, and long-term impact**, however it has been acknowledged that the redistributed traffic will not lead to a significant deterioration of the operational capacity on the surrounding road network.. The Proposed Scheme includes appropriate traffic management measures along the core bus corridor to best balance the requirements to improve road conditions along Kimmage Road Lower for public transport and cyclists, while limiting the local traffic impacts. To enable local access to the core bus corridor it is necessary for traffic to use alternative routes within the local road network which will lead to some increase in traffic along those adjoining streets. On page 99 of this chapter of the EIAR the impact assessment concludes on the basis of the capacity of the route that the "*effect of redistributed traffic associated with the Proposed Scheme is deemed Not Significant and Long-Term".* No necessary mitigation measures are therefore required.

32) Southern bus gate should operate only 5 days rather than 7 days a week, with shorter hours.

As described earlier for cycling facilities in general, a key purpose of the proposed southern Bus Gate on Kimmage Road Lower is to restrict the volume of traffic that will share the road with cyclists for reasons of safety and comfort for cyclists. Any further opening of the bus gate beyond the proposed hours of operation would reduce the suitability of Kimmage Road Lower for cyclists.

33) The left-turn eastbound from Sundrive Road to Kimmage Road Lower should be restricted.

At the request of some local residents this turn restriction was considered in the development of the Proposed Scheme. However, it was omitted from the scheme because such a restriction would increase the volume of traffic along Clareville Road past the primary schools which would not be appropriate for safety reasons.

34) More traffic on Clareville Road at Schools.

EIAR Volume 2, Chapter 6 Traffic & Transport indicates in Table 6-50 that traffic on Clareville Road will increase by 218 PCUs per hour in the morning peak with a **negative, slight, and long-term impact**, however it has been acknowledged that the redistributed traffic will not lead to a significant deterioration of the operational capacity on the surrounding road network. The Proposed Scheme includes appropriate traffic management measures along the core bus corridor to best balance the requirements to improve road conditions along Kimmage Road Lower for public transport and cyclists, while limiting the local traffic impacts.

35) Alternative routes for local traffic and need for further modal filters

One submission has suggested that there should be more local traffic restrictions with modal filters (bike gates), but without specifying anything particular. In the Proposed Scheme there are local traffic restrictions proposed to the degree necessary and appropriate to manage traffic that could be diverted by the proposed bus gates. These will also enable continuous quiet street cycle routes to both east and west of the Core Bus Corridor.

36) Commercial impacts for Kimmage Village.

EIAR Volume 2, Chapter 10 Population provides an assessment of Commercial Amenity under the section for Economic Assessment based on other impacts as follows:

> *"Commercial amenity effects arise from a combination of traffic, air quality, noise and visual effects as discussed in Section 10.4.4.2.1 "*
>
> *"The assessment concluded that these residual traffic, air quality, noise, and visual effects combine to create a Negative, Moderate to Positive, Moderate and Long-term amenity effect on all commercial businesses along the Proposed Scheme. Overall, a Positive, Not Significant and Long-term amenity effect is expected on the following community areas: Mount Argus, Harold's Cross, Harrington Street and Francis Street. All other community areas (Templeogue, Kimmage Manor, Terenure, Rathgar, Clogher Road, Donore Avenue, Whitefriar Street and Meath Street and Merchants Quay) are expected to experience a Neutral, and Long-term amenity effect during the Operational Phase."*

37) Delivery routes for businesses and bin lorries between bus gates.

Access for commercial deliveries can be routed through the junction of Sundrive Road and Kimmage Road Lower at all times, and through the southern Bus Gate No.1 outside of the operational hours. For bin lorries it is normal practice to reverse along quiet cul-de-sac roads rather than to turn around at the end, which is often impractical in a narrow street. This arrangement can apply on the section of Kimmage Road Lower north of Casimir Road where the distance to the farthest house is 170m and this practice has been accepted by the Stage 1 Road Safety Audit in general, included as Appendix M2 of the Preliminary Design Report.

38) Traffic restriction at Kenilworth Square North onto Harold's Cross Road.

Bus Gate No.4 at Kenilworth Square North will divert westbound traffic onto Rathgar Avenue. A submission says that EIAR Chapter 6 does not provide detailed traffic analysis of the impact.

The necessity for Bus Gate No. 4 has been described earlier for item 25 above under Local Traffic Impacts as enabling better performance of this 5-arm junction, which is in the interest of all road-users. EIAR Volume 2, Chapter 6 Traffic & Transport indicates in Table 6-50 that traffic on Rathgar Avenue Road will increase by 198 vehicles per hour in the morning peak. On page 99 of this chapter of the EIAR the impact assessment concludes on the basis of the capacity of the route that the "*effect of redistributed traffic associated with the Proposed Scheme is deemed Not Significant and Long-Term".*

39) Access to Mount Argus Church.

The submission for the Passionist Community (No.80) says that the Proposed Scheme is broadly welcomed, but that the bus gate restrictions for traffic at Harold's Cross Park should operate only at peak morning and evening periods between Monday and Friday so as to enable access from the north not to be diverted.

It has earlier been described that Bus Gate No.2 on Kimmage Road Lower at Harold's Cross Park needs to operate on a 24/7 basis so as to reduce traffic flows to the low level that is suitable for cyclists to share the road. For car access to Mount Argus from the north, the existing route from the northern end of Harold's Cross Park is 0.8km long, while the alternative route via Kenilworth Park will be 1.5km long, an increase of 0.7km, which is only slightly longer.

40) Access to Mount Jerome Cemetery.

The submission for Mount Jerrome Cemetery (No.78) describes the various existing access routes to the cemetery from 9 churches that regularly send funerals to the cemetery. It identifies the alternative routes that will be necessary because of the bus gates and other traffic restrictions that are proposed in the 3 Core Bus Corridor Schemes on the southern side of the city. In each case the submission demonstrates that there are suitable alternative routes available which are largely similar, or perhaps slightly longer. The impact for access to the cemetery will therefore be only slightly affected by the proposed bus priority measures in the Proposed Scheme and the other adjoining CBC schemes.

41) 24 hours restriction of southbound traffic at the most northerly bus gate in Harold's Cross.

Section 4.6.4.3 (on page 27) of EIAR Chapter 4 describes the location of each proposed bus gate and then outlines the exceptions of the operational hours where these would not be on a 24-hour / 7-day week basis. In addition, the proposed bus gates operational times are confirmed in Table 4-9 of the Preliminary Design Report, Supplementary Information as included earlier in Section 2-4-5 of this document. This bus gate will deflect southbound traffic away from at the most appropriate interception point and the operational hours need to match those of Bus Gate No.2 at the southern end of Harold's Cross Park.

2.6 Section 2 Proposals

Summary of issue raised:

1) Cycle track at 79-85 Harold's Cross Road (east side just north of park) behind the parking. Risk of car doors opening into path of cyclists.
2) Objections to road widening with CPO on Harold's Cross Road, by third parties but not by the owners of the properties affected.
3) More tree planting along Harold's Cross Road between park and canal. However, the Harold's Cross Village Community Council don't support the road widening into private gardens.
4) Car park at Hospice inconsistent with planning policies. Not suitable location for Park & Ride.
5) Road widening at Greenmount Close, Harold's Cross Road: Traffic Noise closer to homes / Air quality.
6) Move of bus stop north from Greenmount Close, Harold's Cross Road.
7) Drainage problems on Harold's Cross Road / Mount Drummond.
8) Close through traffic route between Greenmount Avenue and Greenmount Lane.
9) Yellow box at Armstrong Street junction.
10) Traffic through Mount Drummond Area and O'Hara Avenue
11) Reinstate the right-turn at Grand Canal to Grove Road

Responses to issues raised:

1) Cycle track at 79-85 Harold's Cross Road

A submission expresses concern about the proposed cycle track on the eastern side of Harold's Cross Road side just north of park which will be located behind the parking in terms of the risk of car doors opening into path of cyclists.

The proposed road layout in front of 79-85 Harold's Cross Road includes a 2.3m wide parallel parking bay alongside a 1.5m wide cycle track. The issue raised is the risk of car doors opening into the path of cyclists. Between the parallel parking space and cycle track there is a 0.4m physical kerb separation and another 0.4m up to the cycle line markings on the cycle track. This equals to a 0.8m space between the parking space and cycle track.

In accordance with the Cycle Design Manual (September 2023) *"a buffer (0.75m recommended width) should be provided between the cycle lane and parking bays to allow for passenger access/egress, loading and to prevent 'dooring' of cyclists".*

In addition, this type of layout is a cost-effective means of separating cyclists from traffic as the parallel parking space acts as a physical separator between cyclists and traffic. If the cycle track were located on the outer side of the parking bay then vehicles accessing the parking would have to cross the cycle track including when reversing into a space. Such an arrangement would give rise to increased risks for cyclists who might be tempted to overtake a vehicle doing a parking manoeuvre by ducking into the bus lane unexpectedly. The arrangement in the Proposed Scheme is in accordance with both the *Cycle Design Manual* and the *Design Manual for Urban Roads and Streets.*

2) Objections to road widening with CPO on Harold's Cross Road, by third parties but not by the owners of the properties affected.

NTA notes that the directly affected property owners along Harold's Cross Road where road widening is proposed have not objected to the principle of the land acquisition, apart from some concerns about impacts by some occupants of Greenmount Close (as discussed in Issue 5 following). The NTA has consulted with the affected property owners and explained the need for the road widening which is necessary to accommodate segregated cycling facilities along this key radial route into Dublin City Centre.

3) More tree planting along Harold's Cross Road between park and canal. However, the Harold's Cross Village Community Council don't support the road widening into private gardens.

There are a number of existing trees in some places along Harold's Cross Road, many of which are in private garden areas adjoining the road, as well as clusters in the public road where the footpath is quite wide between Mount Drummond Avenue as can be seen in the photograph in Figure 2-6-1.

Figure 2-6-1: Existing streetscape with trees on Harold's Cross Road near Mount Drummond Avenue

In so far as possible the Proposed Scheme will plant some new trees along Harold's Cross Road where there is space available, as is shown in EIAR Volume 3 Figures, Part 5 Landscaping & Urban Realm, drawing Sheet 7.

4) Car park at Hospice inconsistent with planning policies. Not suitable location for Park & Ride.

The proposed small public car park is included in the Proposed Scheme to mitigate the loss of existing on-street parking immediately nearby that will be removed for the provision of a cycle track. It will provide an additional 12 spaces, in recognition of the severely restricted availability of public parking in an area where very few houses have driveways, and to reduce the risk of illegal parking on the proposed cycle tracks along Harold's Cross Road. The shortage of public parking in the area results in irregular and illegal parking on footpaths and at street corners in the surrounding streets. In this context the parking situation in the Harold's Cross area is more restricted than much of the city and is very much consistent with planning policies which encourage a limited supply of parking, but not a complete absence of it.

The CPO Objection describes the car park as a "Park and Ride" facility. The Proposed Scheme statutory application has not described this facility as a Park and Ride facility. Park and Ride facilities are aimed at commuters in outer suburban areas where the catchment area for public transport services becomes very dispersed. They encourage all-day parking at a low cost so as to reduce car trips into the denser urban area. The proposed car park at the hospice will operate like all other public parking in the area for short stays with fairly high tariffs, and for local residents with permits at a modest annual charge of €50. The location is just within the High Demand Red Zone with a tariff of €3.50 per hour as indicated on the Dublin City Council Parking Control Map in Figure 2-9-6. The proposed car park could not be reasonably described as a Park and Ride facility

Section 4.3.1.4 in the Planning Report (Appendix A2.1 in Volume 4 of the EIAR discusses the zoning of the lands on which the proposed car parking would be provided:

"……It is noted that a small area of land under zoning objective Z15 (Community and Social Infrastructure), within the confines of Our Lady's Hospice along Harold's Cross Road, is required to facilitate Construction Compound K2 during the Construction Phase and a proposed new public car park during the Operational Phase. Permissible uses for the Z15 (Community and Social Infrastructure) zoning objective relevant to the subject lands include (inter alia):

- *Community Facility.*

Open for consideration Uses include (inter alia):

- *Car park ancillary to main use.*

Following consideration of several possible locations, proposals for a small public car park at Our Lady's Hospice were selected, with the location to the front of the site nearest Harold's Cross Road. The proposed car park will be controlled by Dublin City Council and visitors to Our Lady's Hospice can use it. As part of the Proposed Scheme, Our Lady's Hospice entrance gate will move westwards to beyond the car park which can be controlled by the Hospice. The historic gates on Harold's Cross Road will remain in their existing position, however, they will no longer close as the driveway to the proposed car park will become part of the public road. The location of the proposed car park will not impact upon the integrity of the hospice use and has the least impact for the future development and operation of same, while compensating for the loss of some existing public parking on the street nearby.

At present, the subject lands comprise a private grassed area that form part of the wider Hospice lands. It is a fenced-off area and is not used for any active recreation. The proposed parking area can be used by visitors to the Hospice.

The area in question is of a very modest scale comprising of approximately 680m2 . In regard to the wider Z15 zoning objective of the site which is approximately 9.1hectares, it comprises approximately 0.7% of the site. The subject lands are peripheral and are a non-integral part of the overall land use.

The Proposed Scheme will provide a grassed area where the aforementioned lands adjoin Harold's Cross Road, as well as on its western perimeter. Furthermore, it will retain all but one of the existing trees resulting in a net increase from four trees to eight around the car park area."

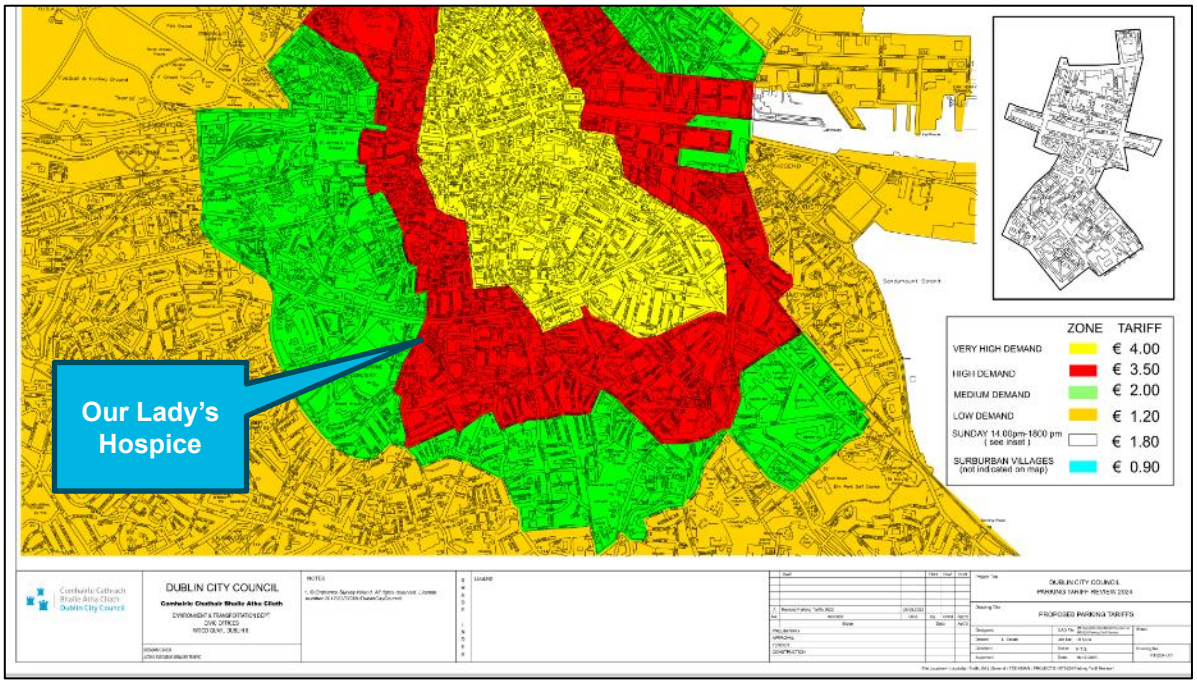

Figure 2-6-2: Dublin City Council Parking Control Map

5) Road widening at Greenmount Close: Traffic Noise closer to homes / Air quality.

The Proposed Scheme will not bring traffic closer to this home at Greenmount Close, as a cycle track will be provided in the road widening, which will realign the footpath partially into the garden area. The sources of the noise from general traffic and from buses in the bus lane will remain approximately in the same locations, and therefore there will be no increase in noise for the residents at Greenmount Close due to greater proximity to the road.

The Proposed Scheme will divert some traffic away from Harold's Cross as a result of the proposed bus gates on Kimmage Road Lower and will no longer be a viable l traffic route to and from Dublin City Centre. In EIAR Volume 2, Chapter 6, Table 6-48 (page 91) it is indicated that traffic on Harold's Cross Road in the AM peak hour will reduce from 1,239 vehicles per hour to 895 vehicles per hour, a reduction of 28%.

Table 7.36 in Section 7.5.2 of Chapter 7 (Air Quality) in Volume 2 of the EIAR identifies that a summary of the Operational Phase predicted road traffic impacts on local human receptors as a result of the Proposed Scheme are assessed as being Neutral, Long-term.

Section 7.6.2 in Chapter 7 states the following with regard to residual air quality impacts:

> *"The air dispersion modelling assessment has found that the majority of all modelled receptors are predicted to experience negligible impacts due to the Proposed Scheme, and beneficial impacts are also estimated along the length of the Proposed Scheme. There are no substantial or moderate adverse effects expected as a result of the Operational Phase of the Proposed Scheme. In 2028, all receptors will have ambient air quality in compliance with the ambient air quality limit values for the DS scenario. In 2043, all receptors are expected to have ambient air quality in compliance with the ambient air quality standards for the DM and the DS scenarios. Overall, it is considered that the residual effects as a result of the Proposed Scheme's operation will be Neutral and Long-Term."*

Section 9.5.2.1 in Chapter 9 (Noise & Vibration) in Volume 2 of the EIAR states the following with regard to road traffic noise in the Operational Phase:

> *"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."*

Table 9.47 in Section 9.5.2.4 of Chapter 9 provides a summary of the Operational Phase predicted traffic noise impacts for the Proposed Scheme as follows:

- Opening Year (2028) - Direct, Positive, Moderate and Short to Medium-Term to Direct, Neutral, and Short to Medium-Term;
- Design Year (2043) – Direct, Positive, Moderate and Long-Term to Direct, Neutral and Long-Term.

With regard to Operational Phase Vibration, the predicted impacted is assessed as Neutral, Imperceptible and Short to Long-Term.

The cumulative impact of the Proposed Scheme in conjunction with other Core Bus Corridor schemes in the same part of the city in terms of traffic and transport can be found in Chapter 21 (Cumulative Impacts & Environmental Interactions) of the EIAR, as well as in Appendix A6.1 (TIA Report) in Volume 4 of the EIAR. This assessment describes how there will be substantial modal shift (TIA Appendix A6.1 page 6) of transport demand from private car to more sustainable modes of public transport and cycling across Dublin as a result of the increased capacity, efficiency, and reliability of these other modes of transport Overall car travel on the radial routes towards the city will reduce by approximately 32% (Diagram 7.6, TIA Appendix A6.1 page 138), both along the core bus corridors. It should be noted that only a certain volume of traffic can pass through the major junctions on the radial routes towards the city, such as Terenure Cross to the south of Harold's Cross, which is currently operating at capacity. This will effectively cap the volume of traffic that can proceed towards Harold's Cross Road in the future, even with displacement away from both the Kimmage and Rathmines corridors.

In EIAR Appendix A6.1 Diagram 7.13 (shown in snapshot below) and Diagram 7.14 illustrate the difference in traffic flows (Do Minimum vs Do Something) on roads in the AM Peak Hour for the Opening

Year (2028) and the Design Year (2043) with the Proposed Scheme and all other proposed Core Bus Corridor schemes in place. The diagrams are extracts from Figure 6.13 and 6.16 in TIA Appendix 3 (Maps). Reductions in traffic flows are indicated by the blue lines with increases in traffic flow indicated by the red lines. This map shows no net change in traffic flow along Harold's Cross Road from the Do-Minimum situation as there will be a balance between a reduction in traffic from the Kimmage direction and an increase in traffic from the Terenure direction.

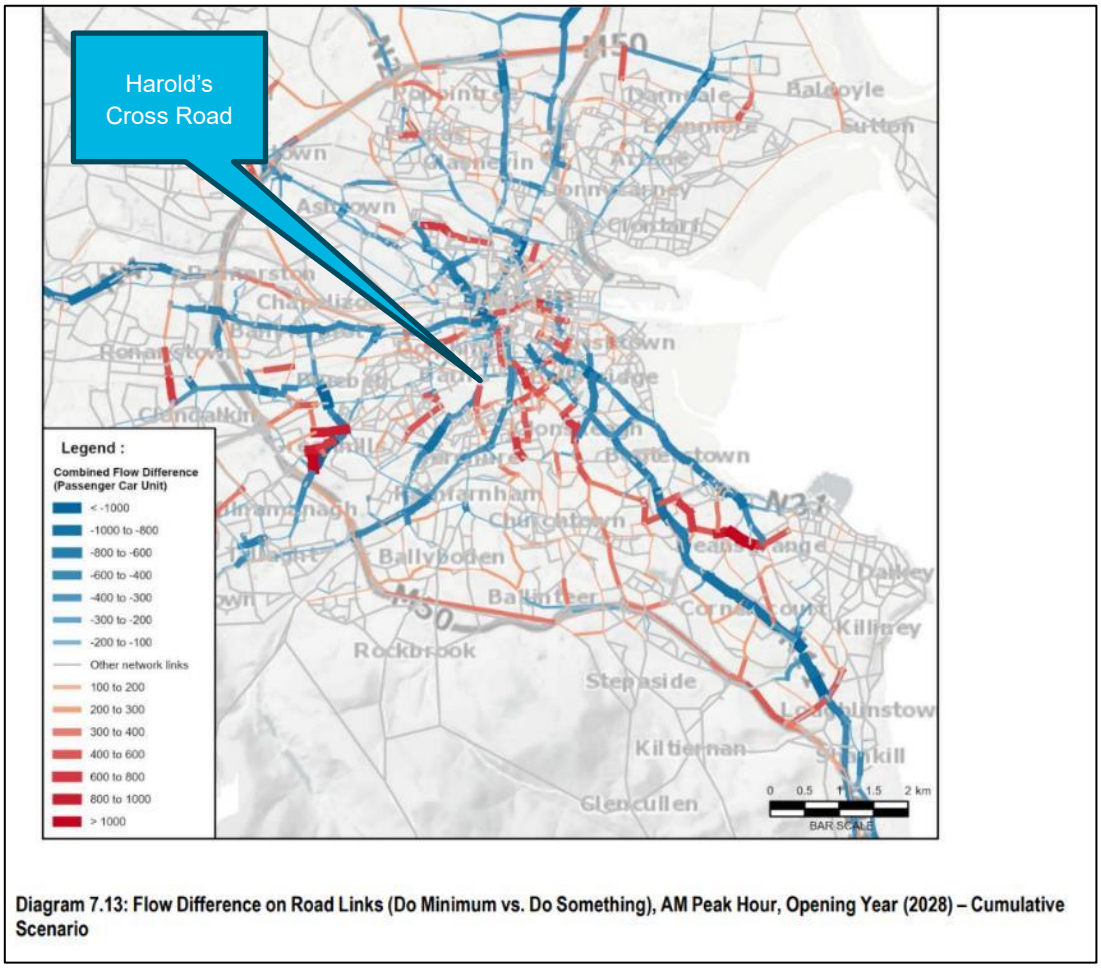

Diagram 7.13: Flow Difference on Road Links (Do Minimum vs. Do Something), AM Peak Hour, Opening Year (2028) – Cumulative Scenario

Similar to the response for traffic noise, there should be an improvement in air quality at Greenmount Close due to the reduction of general traffic flow as a result of the proposed bus gates along the Kimmage Core Bus Corridor.

6) ,Move of bus stop north from Greenmount Close, Harold's Cross Road.

The NTA appreciates the relocation of the bus stop No.1344 140m further north will present an inconvenience for the resident of Greenmount Close who has a disability. The Supplementary Information, Preliminary Design Report, Appendix H contains the Bus Stop Review Report, which was carried out to inform the design and assessed the locations of the existing bus stops to determine whether a stop should be removed, relocated, or remain in the same location. This exercise was carried out in order to optimise the performance of the bus service along this route by reducing journey time of the bus service, to increase the walking catchment of the bus stops and to ensure key trip attractors located along the route are sufficiently covered within the catchment of bus stop. The assessment demonstrated that the relocation of this bus stop was an appropriate intervention to maximise the benefits to the bus service in this area. It will be in a more suitable location and the move will contribute to the overall improvement of the bus services by reducing the need for buses to stop twice on this short section of street. It will require 2 minutes additional walking time to reach the new bus stop from the current location. If the existing bus stop were to be retained, it would be necessary to widen the footpath locally for a narrow bus stop island, which would increase the encroachment into the property at Greenmount Close in the Compulsory Purchase Order. The existing bus stop also clashes with the

location for the proposed new pedestrian across Harold's Cross Road to provide more direct access to St. Clare's primary school.

7) Drainage problems on Harold's Cross Road / Mount Drummond.

In the Proposed Scheme at this junction the drainage issues described can be rectified. Harold's Cross Road will be reconstructed as part of the proposed road widening, and this will include a new surface water drainage system as is shown in EIAR Volume 3 Figures, Part 11 Proposed Surface Water Drainage Works, Sheet 7, from which a snapshot is included in Figure 2-6-2.

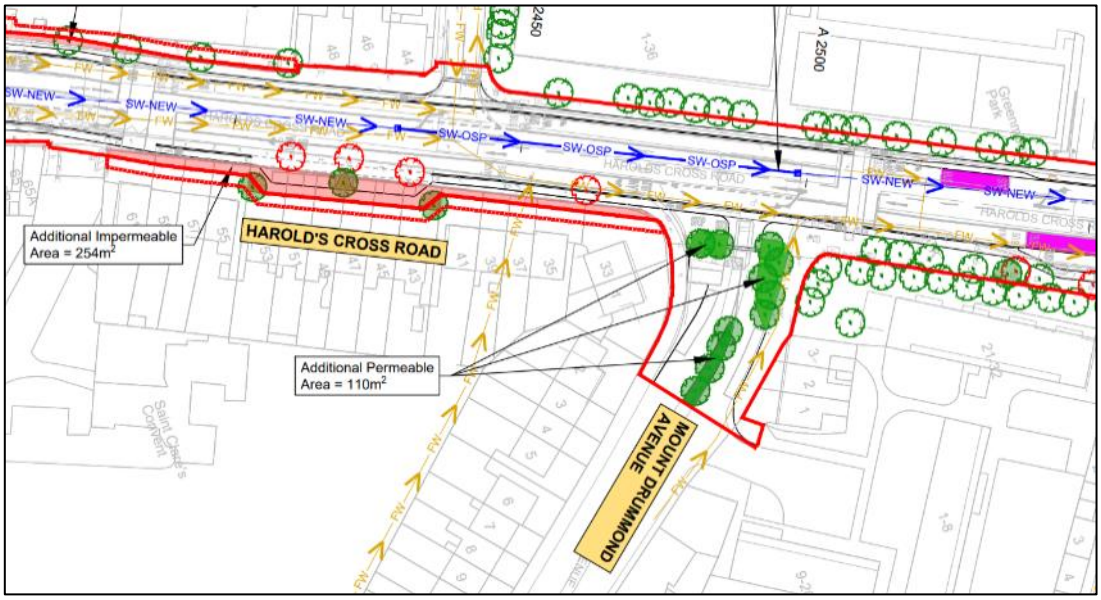

Figure 2-6-3: Proposed Scheme Drainage on Harold's Cross Road at Junction with Mount Drummond Avenue

8) Close through traffic route between Greenmount Avenue and Greenmount Lane.

The Traffic Impact Assessment for the Proposed Scheme has indicated that there will be a substantial reduction in traffic volumes along Harold's Cross Road. Greenmount Lane and Greenmount Avenue are very narrow streets where two-way traffic can only pass on a give-way basis. This not an attractive short-cut route from the main roads as there would be a risk of delay if another vehicle were encountered in the opposite direction. If there were to be a road closure on these streets it would cause considerable disruption and inconvenience for the local residents and businesses. Vehicles on Greenmount Lane would need to make a difficult U-turn on the very narrow street to be able to exit northwards rather than simply continuing along Greenmount Avenue out onto Harold's Cross Road. There would be little advantage gained, and much disruption caused by a traffic restriction as suggested.

9) Yellow box at Armstrong Street junction.

As is shown in EIAR Volume 3 Figures, Part 2 General Arrangement drawings Sheet 7 in the Proposed Scheme there will be yellow boxes provided on Harold's Cross Road opposite the side street junctions to enable local traffic to exit onto the main road, or to turn across the opposing traffic to enter the side street.

10) Traffic through Mount Drummond Area and O'Hara Avenue.

A submission raises a concern about the potential for some traffic to divert from Harold's Cross Road through the Mount Drummond area via O'Hara Avenue to make an illegal right-turn onto Grove Road to avoid the proposed right-turn ban at Robert Emmet Bridge.

If a problem arises in this respect during the operational phase, it can be addressed through the proposed camera enforcement system.

11) Reinstate the right-turn at Grand Canal to Grove Road

The northbound right-turn from Harold's Cross Road onto Grove Road eastbound is to be restricted in the Proposed Scheme so as to enable full bus priority in the northbound direction towards Clanbrassil Street Upper. Currently a small volume of right-turn traffic causes the straight-ahead traffic to move into the left-lane where the bus lane is curtailed short of the junction. In many similar situations along the Grand Canal the right-turn is restricted, as is the case in the opposing southbound direction from Clanbrassil Street towards Parnell Road. The demand for this right-turn can displace to other routes, such as Clogher Road a short distance to the west, which is the alternative route from the Kimmage direction due to the proposed bus gates. Some traffic can instead turn right at Leonard's Corner onto South Circular Road a short distance further north. The right-turn onto Grove Road cannot be retained if proper bus priority is to be provided at this major junction along the Core Bus Corridor.

2.7 Section 3 Proposals

Summary of issue raised:

1) Alternative Road Layout Options at Robert Emmet Bridge
2) Aesthetics of footbridges at Robert Emmet Bridge
3) Road widening at Clanbrassil Street Upper and historic retaining wall
4) Parapet wall removal on Clanbrassil Street Upper west side.
5) Removal of on-street parking on Clanbrassil Street Upper
6) Loading for businesses on Clanbrassil Street Lower
7) Proposals at St. Patrick's Court

Responses to issues raised:

1) Alternative Road Layout Options at Robert Emmet Bridge and Leonard's Corner Junction.

EIAR Volume 2, Chapter 3 Alternatives, Section 3.1.4.3 describes three alternatives that were considered for the required road widening at Robert Emmet Bridge. These options were all based on the provision of bus lanes in both directions, as well as appropriate widths for cyclists and pedestrians.

For the provision of bus priority and cycling facilities across Robert Emmet Bridge an alternative option has been suggested instead of the proposed road widening at the bridge and along the northern approach ramp on Clanbrassil Street Upper. Such an option would remove an existing traffic lane in each direction and provide bus priority through an upstream signal-controlled priority arrangement. There would then be space on the existing bridge to provide segregated cycle tracks.

The existing bridge is 15m wide between the parapets, with an 11.4m wide road carriageway between kerbs, and 1.8m wide footpaths on both sides. The existing road carriageway is 0.7m narrower than required for 4 x 3m wide lanes, with 2 bus lanes and 2 traffic lanes. The footpaths are 0.2m narrower than the 2.0m desirable minimum width. If the 2 bus lanes were omitted on the bridge, the space available could be allocated for 2 x 3m traffic lanes + 2 x 2.0m footpaths + 5m for cycle tracks, which could consist of a 2m wide southbound cycle track and a 3.0m wide northbound cycle track divided into a straight-ahead cycle lane and a right-turn cycle lane onto the Grand Canal cycle route along Windsor Terrace.

Such an arrangement would involve the omission of both bus lanes over a length of 100m across Rober Emmett Bridge and for a 70m length of Clanbrassil Street Upper which is similarly narrow on an embankment between retaining walls. This link between the junctions at Parnell Road / Grove Road at the southern end and Leonard's Corner at the northern end is 300m long. The northbound bus lane would be shortened from 300m to 200m long to end at the Leonard's Corner Junction. The southbound bus lane would be reduced from 190m long to 90m to end 100m upstream of the junction at Grove Road. The shorter bus lanes are indicated on Figure 2-7-1.

This option would require the provision of bus priority signal control for northbound buses at the junction with Parnell Road. In the northbound direction signal-controlled bus priority could probably operate satisfactorily, with careful traffic queue management along this link to ensure that the queue approaching Leonard's Corner would not exceed the 200m length of the approach bus lane.

In the southbound direction this option would require the provision of bus priority signal controls 100m upstream of the junction at Grove Road. In the southbound direction signal-controlled bus priority could not operate satisfactorily as the 90m length of bus lane is much too short for successful traffic queue management along this link to ensure that the traffic queue in the mid-link section at the signal-controlled bus priority would not exceed the 90m length of the adjoining bus lane. In effect the option of a shorter bus lane in the southbound direction would be unworkable, and there would be no effective bus priority over the 300m long link between Leonard's Corner and the Grand Canal crossing. This option would therefore significantly diminish the bus priority offered by the Proposed Scheme in this section.

In conclusion, the alternative option of omitting the bus lanes at Robert Emmet Bridge and the northern approach ramp on Clanbrassil Street Upper so as to avoid the need for widening at the bridge, would undermine the key objective to maximise bus priority on this critical link of the core bus corridor which is congested at present with delays for buses.

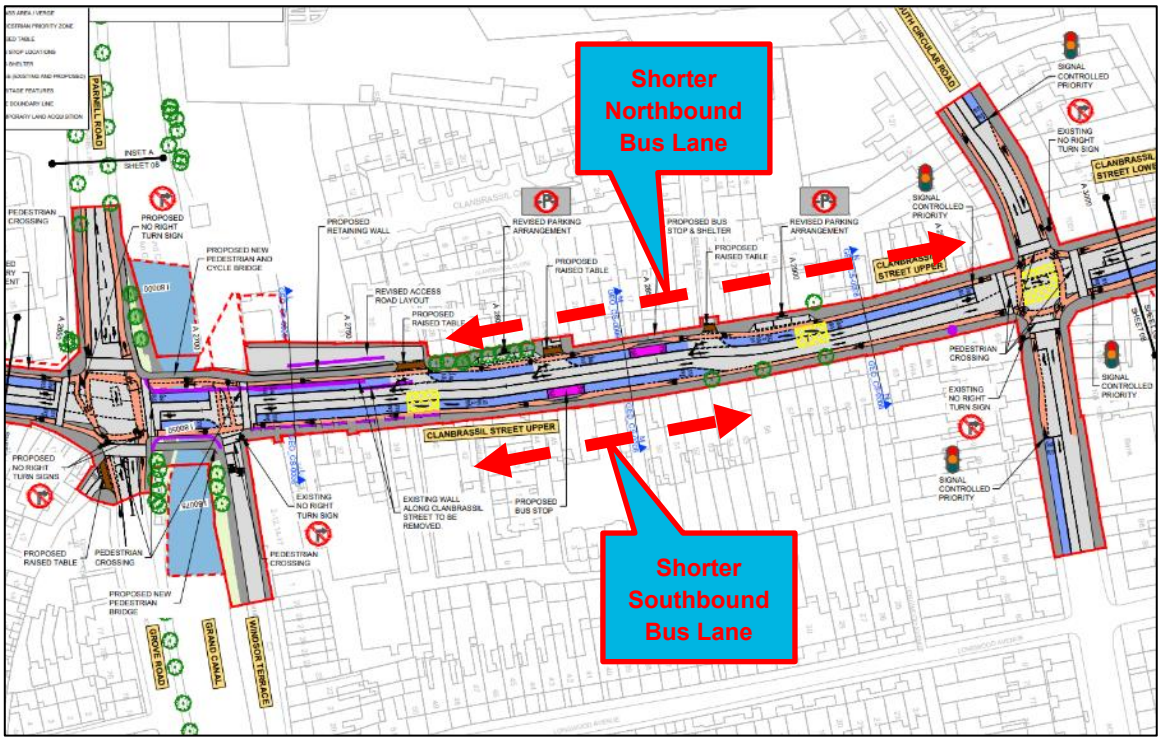

Figure 2-7-1: Proposed Scheme Layout in Section 3, Sheet 08, with Alternative Option for Shorter Bus Lanes

2) Aesthetics of footbridges at Robert Emmet Bridge

NTA acknowledges the high-quality visual appearance of Robert Emmet Bridge with the distinctive balustraded parapets. In designing the proposed new footbridges the structure was arranged to align carefully with the key features of the existing bridge with a slim deck and glass parapets such that the old bridge will remain highly visible behind the new bridge. This is illustrated in Figures 2-7-2 showing the existing situation, and in Figure 2-7-3 showing the proposed situation. In addition, pedestrians (and cyclists on the western footbridge) will have a close-up view of the façade of the old bridge from the new footbridges so that they can better appreciate the aesthetics of the old bridge.

Figure 2-7-2: Existing View of Robert Emmet Bridge from the East

(EIAR Volume 3, Chapter 17, Figure 17.2.1.5)

Figure 2-7-3: Proposed View of Robert Emmet Bridge from the East

(EIAR Volume 3, Chapter 17, Figure 17.2.1.6)

Section 17.5.2.2.4 in Chapter 17 in Volume 2 of the EIAR reviews the existing and proposed photomontage views shown above. With respect to the proposed view (View 4b: as proposed), it states:

> *"…The new bridge deck obscures the top of the arch of Robert Emmett Bridge from this vantage, however, views of the ornamented balustrade and piers are retained by the use of the glass parapet. The proposals will result in a change in the character and a reduction of the visual amenity through the partial screening of the existing historic bridge and through the introduction of a new modern bridge structure. However, the new bridge has a visually lightweight design and most features of significant value in the view will be retained and will remain visible e.g. tree planting, key features of the bridge (balustrade, piers, relief bust and ornamental lighting columns)."*

The predicted operational phase architectural heritage impacts, these are summarised in Table 16.20 in Chapter 16 in Volume 2 of the EIAR. With regard to the impact of the proposed new bridges on Robert Emmet Bridge, the predicted residual impact is categorised as Indirect, Negative, Slight, Long-Term.

3) Objection to road widening with CPO at Clanbrassil Street Upper.

NTA has consulted with the affected property owners and explained the need for the road widening, which is necessary to achieve full bus priority and segregated cycling facilities along this key radial route into Dublin City Centre, and to achieve the project objectives.

EIAR Chapter 10 (Volume 2) acknowledges the significance of the residual impact of this aspect of the Proposed Scheme in Section 10.4.4.1.2.1 as follows:

> *"To accommodate the widening of the carriageway to the north of Robert Emmet Bridge, demolition of the residential property at 32A Clanbrassil Street Upper (at Gordon's Fuel) is required. The land take effect on this residential property is Negative, Profound and Long-term."*

4) Parapet wall removal on Clanbrassil Street Upper west side.

For the proposed widening of Clanbrassil Street Upper on the western side of the road, it will be necessary to construct a new retaining wall as shown in Figure 2-7-4. The existing masonry parapet wall will be disassembled, and the materials will be reused in the parapet of the new wall. This is described in the EIAR Volume 2, Chapter 4, Section 4.5.3.8.1, in Chapter 5, Section 5.5.4.1.4, and in the Preliminary Design Report Section 8.5.1 (Supplementary Information). If all of the existing masonry retaining wall materials were to be salvaged, this would require very difficult temporary works for a sheet pile wall to be installed behind the existing wall with associated closure of half of the public road, which would cause major disruption for all road users over a long period of time. Such an arrangement would not be practicable. Instead it is proposed to face the new wall with masonry similar to the old wall.

At the abutments of Robert Emmet Bridge the new structures will be carefully integrated with the existing masonry wing walls so as to preserve as much as possible of the old structures.

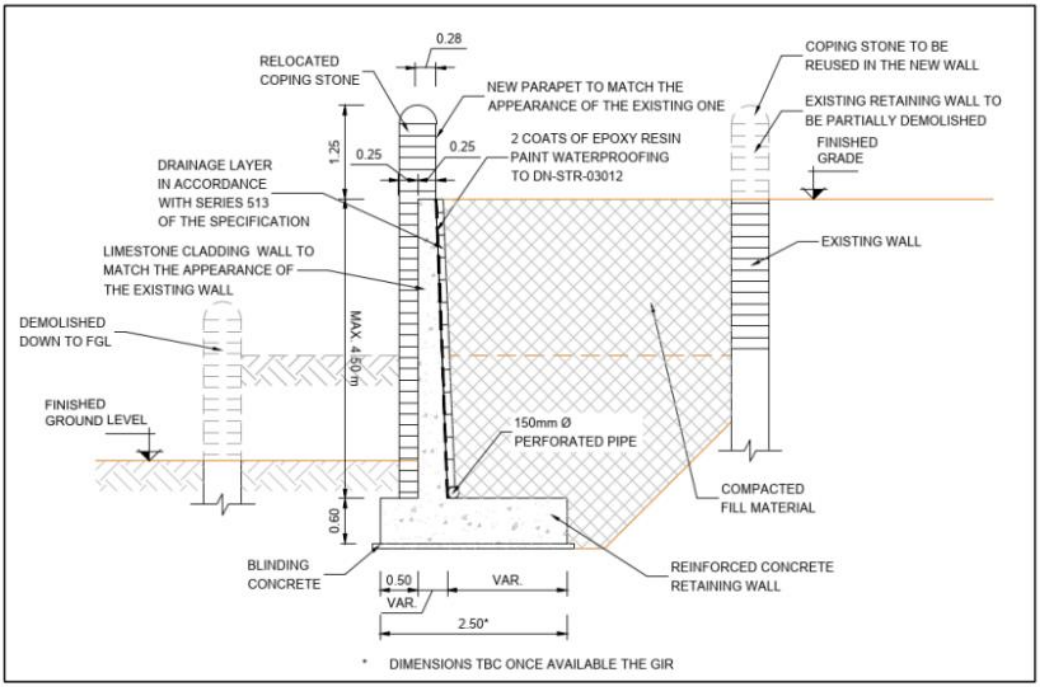

Figure 8.12: Kimmage 03 – Typical Cross Section of Retaining Wall

Figure 2-7-4: Cross-Section of the proposed retaining wall for the widening of Clanbrassil Street Upper

(Supplementary Information, Preliminary Design Report)

Section 16.5.1.2 in Chapter 16 in Volume 2 of the EIAR sets out the mitigation which will implemented and acknowledges the residual impacts:

> *"…. Direct impacts within the Grand Canal Conservation Area will also include the proposed new cycle / pedestrian bridges on either side of Robert Emmet Bridge (NIAH 50080983) and alterations to the end walls of the bridge itself which is of Regional Importance and Medium Sensitivity. The alterations to the bridge and the supporting piers on the tow paths of the Grand Canal (CBC0011BTH042) will have a direct impact on the Conservation Area and its character. The Grand Canal Conservation Area is of Regional Importance and Medium Sensitivity. The pre-mitigation Construction Phase impact will be Direct, Negative, Moderate and Long-Term. The architectural heritage specialist will record, protect and monitor the bridge during the construction works in accordance with Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR. The proposed piling on the tow paths of the Grand Canal will also be monitored by the appointed contractor to ensure that no damage occurs to the Grand Canal, its tow path or the harbour to the west. The end walls of the bridge will be recorded in detail by the architectural heritage specialist before being carefully taken down. The materials will be retained for reuse and reinstated in place of the sections of the galvanised railings to the east and west of the bridge. This mitigation will ensure that the historic fabric of the 1930s end walls will be retained where practicable. Recording will be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor. The architectural heritage specialist will oversee the labelling, taking-down and reinstatement of the end walls. Works to historic fabric will be carried out in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR. This mitigation will reduce the magnitude of the impact from Medium to Low. The predicted residual Construction Phase impact will be Direct, Negative, Slight and Long-Term…."*

5) Removal of on-street parking on Clanbrassil Street Upper

A submission from several residents at 50/51/52 Clanbrassil Street Upper has objected to the removal of existing on-street parking and loading.

To enable reliable bus priority along Clanbrassil Street Upper it is necessary to remove the existing 3 part-time parking spaces in the bus lane on the eastern side of the street. Some of the adjoining houses on this section of street have driveways for off-street parking. There is no existing loading bay on that side of the street. The parking on the western side of the street will be modified to enable the provision of a cycle track with a reduction from 8 to 6 parking spaces.

The impact of the Proposed Scheme for Parking and Loading in Section 3 is assessed in EIAR Volume 2, Chapter 6 Traffic & Transport, Section 6.4.6.1.4.4 as follows:

> *"As shown in Table 6-32 proposed amendments to parking / loading will result in a loss of 19 spaces along Section 3. Where parking is removed, the impact varies between negligible and slight. The overall significance of effect is assessed as Negative, Slight and Long-Term, primarily as a result of the loss of Pay & Display / permit parking on R137 Clanbrassil Street Lower between South Circular Road and Lombard Street West. This slight effect is considered acceptable in the context of the planned outcome of the Proposed Scheme, which is to improve accessibility to this local area (on foot, by bicycle and bus) for residents and visitors to local shops and businesses."*

6) Loading for businesses on Clanbrassil Street Lower

Some businesses on the section of Clanbrassil Street Lower immediately north of the Leonard's Corner junction are concerned about the provisions for loading on the western side of the street.

There is no existing loading bay at this location, with two parking spaces provided outside the cycle lane, which will be removed in the Proposed Scheme to facilitate the provision of segregated cycle tracks on both sides of the street.

The impact of the Proposed Scheme for Parking and Loading in Section 3 is assessed in EIAR Volume 2, Chapter 6 Traffic & Transport, Section 6.4.6.1.4.4 as *Negative, Slight and Long-Term.*

7) Proposals at St. Patrick's Court (west side of Clanbrassil Street Lower)

Several submissions raised concerns about the temporary impacts of the proposed Construction Compound K3 located on parts of a small public plaza area, as well as the long-term proposals for tree planting as part of an upgrade to the urban realm after the compound is removed.

The proposed construction compound K3 is described in EIAR Volume 2, Chapter 5, Section 5.7. An indicative layout of the compound is shown in Image 5.5 in EIAR Chapter 5, and this is reproduced in Figure 2-14-5.

EIAR Chapter 5, Section 5.7.2 sets out what will be contained in the Construction Compound:

> *"As shown in Image 5.3 to Image 5.5, the Construction Compounds will contain a site office and welfare facilities for NTA personnel and contractor personnel. Limited car parking will be allowed at the Construction Compounds, in line with the principles of the Construction Stage Mobility Management Plan (CSMMP), as described in Appendix A5.1 CEMP in Volume 4 of this EIAR, which will be prepared by the appointed contractor. Excavated materials such as topsoil, subsoil, concrete, rock etc., will not be stored at the Construction Compounds for reuse, as the compounds are too small. All excavated materials will be immediately loaded into lorries for removal from the site of the excavation. Items of plant and equipment, described in Section 5.6, will be stored within the Construction Compounds when not in use."*

Section 5.5.3.2 in Chapter 5 in Volume 2 of the EIAR addresses access to property during construction:

> *"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…."

In addition, the appointed contractor will be required to put in place a Communications Plan in accordance with the NTA's requirements to inform the public (and affected properties) in advance of construction works of a disruptive nature. Section 5.1.6 in the Construction Environmental Management Plan (CEMP) in Appendix A5.1 in Volume 4 of the EIAR states:

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

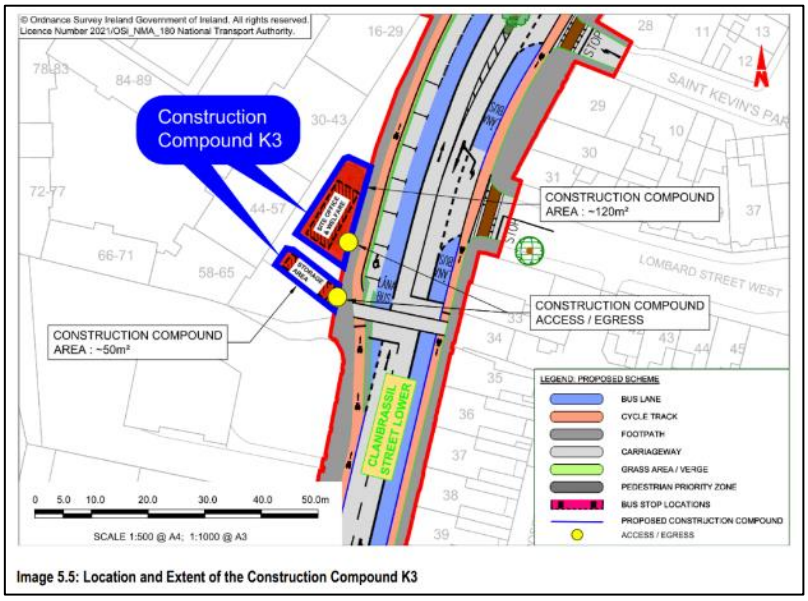

Figure 2-7-5: Construction Compound K3 at St. Patrick's Court

a) Access to Businesses

The two existing main access pathways to the businesses on the western side of St. Patrick's Court from the east and north will remain open at all times so that the accessibility of the businesses is not impeded.

Section 5.5.3.2 in Chapter 5 in Volume 2 of the EIAR addresses access to property during construction:

"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…."

In addition, the appointed contractor will be required to put in place a Communications Plan in accordance with the NTA's requirements to inform the public (and affected properties) in advance of construction works of a disruptive nature. Section 5.1.6 in the Construction Environmental Management Plan (CEMP) in Appendix A5.1 in Volume 4 of the EIAR states:

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particularly disruptive nature which is likely to impinge on their property such as boundary works, road closures and diversions, and any mitigating actions that are being taken to minimise such disruption."

b) Visibility and Signage Businesses

To compensate for reduced visibility of the businesses caused by temporary buildings in the construction compound, temporary signage will be provided beside the main footpath along the road edge. Section 5.5.3.2 in Chapter 5 in Volume 2 of the EIAR addresses access to property during construction:

"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…."

In addition, the appointed contractor will be required to put in place a Communications Plan in accordance with the NTA's requirements to inform the public (and affected properties) in advance of construction works of a disruptive nature. Section 5.1.6 in the Construction Environmental Management Plan (CEMP) in Appendix A5.1 in Volume 4 of the EIAR states:

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c) Deliveries.

There is an existing loading bay a short distance to the north which will remain operational at all times during the construction period. Therefore, loading to the businesses will not be restricted at any stage.

Section 5.5.3.2 in Chapter 5 in Volume 2 of the EIAR addresses access to property during construction:

"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…."

In addition, the appointed contractor will be required to put in place a Communications Plan in accordance with the NTA's requirements to inform the public (and affected properties) in advance of construction works of a disruptive nature. Section 5.1.6 in the Construction Environmental Management Plan (CEMP) in Appendix A5.1 in Volume 4 of the EIAR states:

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d) Visual disturbance by the construction compound.

A degree of visual disturbance is inevitable while the compound is in operation. However, the compound has been divided into two small areas to minimise this impact and to maintain sightlines across the area to the businesses on the western side of the street as much as possible. In particular, the main access pathways from the east and north will remain open at all times which will provide clear visibility towards the businesses. Section 17.4.3.1.3 in Chapter 17 addresses townscape and visual impact during construction:

> *"…Construction Compound K3, which will be small, is to be located on an existing part-grass / part-paved public space fronting St. Patrick's Court / Greenville Place along R137 Clanbrassil Street Lower. Environmental Impact Assessment Report (EIAR) Volume 2 of 4 Main Report Kimmage to City Centre Core Bus Corridor Scheme Chapter 17 Page 24 The construction works will be wide-ranging along the road corridor and will result in substantial alterations to the existing streetscape character. The construction works will not alter the existing townscape character along this section of the Proposed Scheme, but the presence of construction activity will be an impact on streetscape. The magnitude of change in the baseline environment is medium. The potential townscape / streetscape effect of the Construction Phase is assessed to be Negative, Moderate and Temporary / Short-Term."*

e) Security / anti-social behaviour.

The compound has been divided into two small areas to minimise the potential screening effect in front of the buildings on the western side of St. Patrick's Court, which should reduce the risk for the security of the adjoining premises, and of anti-social behaviour. Section 5.5.2.7 in Chapter 5 states: *"As part of preparatory works, the Construction Compounds will be set up which will include installation of the necessary facilities including the site office, welfare facilities, etc. Controlled access to the Construction Compounds will be implemented, fencing will be erected, and lighting will be installed…."*

f) Loss of green space.

The loss of these small green spaces will be only short-term, and they will be reinstated with enhanced planting as shown in the landscaping drawings (EIAR Volume 3 Figures, Part 5, Sheet 8) to improve the amenity for long-term benefit to the local community and businesses.

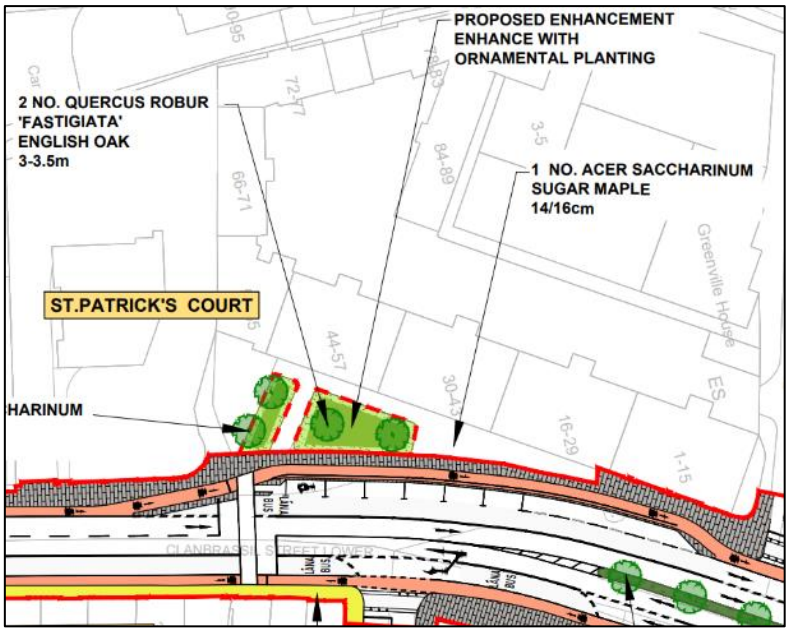


Figure 2-14-6: Proposed Landscaping at St. Patrick's Court

g) Loss of Business and Risk of Seeking to Relocate

With the proposed mitigation measures and the temporary duration of the construction compound, it is unlikely that there will be a loss of business that could cause the owners to seek to relocate to another premises. Section 5.5.3.2 in Chapter 5 in Volume 2 of the EIAR addresses access to property during construction:

"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…."

h) Alternative Location for Construction Compound at St. Vincent's Street Car Park

One submission suggested an alternative location for the construction compound at St. Vincent's Street car park a short distance to the south and on the eastern side of the street. In the Proposed Scheme there will be a reduction in on-street parking along Clanbrassil Street Lower in this vicinity. If the construction compound were to be located at the small St. Vincent's Street car park that would further reduce the amount of public parking in the area to serve the local businesses, which would be undesirable compared to the proposed location where no parking impact would arise.

2.8 Development Application Unit

Summary of issue raised:

The submission noted that the EIAR included a desk based Archaeological Impact Assessment, and the Development Applications Unit (DAU) noted they are broadly in agreement with the findings of the Archaeology and Cultural Heritage.

The DAU requested that the following conditions be attached to planning consent:

1. All mitigation measures in relation to archaeology and cultural heritage as set out in Chapter 15 of the EIAR (Courtney Deery Heritage Consultancy Ltd; date July 2023) shall be implemented in full, except as may otherwise be required in order to comply with the conditions of this Order.
2. The Construction Environment Management Plan (CEMP) shall include the location of any and all archaeological or cultural heritage constraints relevant to the proposed development as set out in Chapter 15 of the EIAR and by any subsequent archaeological investigations associated with the project. The CEMP shall clearly describe all identified likely archaeological impacts, both direct and indirect, and all mitigation measures to be employed to protect the archaeological or cultural heritage environment during all phases of site preparation and construction activity.
3. A Project Archaeologist shall be appointed to oversee and advise on all aspects of the scheme from design, through inception to completion.
4. The planning authority and the National Monuments Service shall be furnished with a final archaeological report describing the results of all archaeological monitoring and any archaeological investigative work/excavation required, following the completion of all archaeological work on site and any necessary post-excavation specialist analysis. All resulting and associated archaeological costs shall be borne by the developer.

Responses to issues raised:

As part of the EIAR, a Construction Environmental Management Plan (CEMP) has been prepared for the Proposed Scheme and is included as Appendix A5.1 in Volume 4 of the EIAR. The CEMP will be updated by the NTA prior to finalising the Construction Contract documents for tender, so as to include any additional measures required pursuant to conditions attached to An Bord Pleanála's decision. The CEMP comprises the construction mitigation measures, which are set out in the EIAR and NIS. All of the measures set out in this CEMP will be implemented in full by the appointed contractor and its finalisation will not affect the robustness and adequacy of the information presented and relied upon in the EIAR and NIS. Chapter 15 in Volume 2 of the EIAR sets out the archaeological baseline in which the Proposed Scheme is located, assesses the potential for archaeological impacts as a result of the Proposed Scheme and sets out the mitigation measures which will be implemented. In Section 5.1.1.2 of the CEMP (Appendix A5.1 in Volume 4 of the EIAR) outlines that the CEMP is part of the EIAR and should be read in conjunction with it:

> *"The CEMP has been prepared as part of this EIAR and the NIS and should be read in conjunction with the following Proposed Scheme specific documents:*
>
> - *The EIAR, with particular reference to Chapter 5 (Construction) in Volume 2 of this EIAR; • The NIS;*
> - *The Construction Contract; and*
> - *Copies of An Bord Pleanála's Order, Inspector's Report and associated documentation…."*

Archaeological mitigation to be implemented is set out in Table 5.2 of the CEMP and it is noted that Table 5.2 should be read in conjunction with the relevant technical assessment chapter (in this case Chapter 15).

Table 5.2 of the CEMP (refer to entries relating to Chapters 15 and 16 within the table) list out the locations of all archaeological and cultural heritage constraints which require monitoring, along with proposed actions associated with each location.

The NTA notes the proposed condition to appoint a Project Archaeologist and confirm that section 15.5.1.1 of Chapter 15 of the EIAR sets out that:

> *"The NTA will procure the services of a suitably-qualified archaeologist as part of its Employer's Representative team administering and monitoring the works. The appointed contractor will make provision to allow for archaeological monitoring, inspection and excavation works that may arise on the site during the Construction Phase."*

Mitigation related to archaeological management is outlined in Chapter 15 of the EIAR (section 15.5.1.1.1) and also summarised in Chapter 22 of the EIAR and Table 5.2 of the CEMP. The issue of funding with respect to archaeological excavation is acknowledged by the NTA:

> *"As part of the licensing requirement and in accordance with the funding letter, adequate funds to cover excavation, post-excavation analysis, and any testing or conservation work required will be made available."*

With regard to the request for a final archaeological report to be provided to the Planning Authority and the Department, it is the intention of the NTA that liaison continues with the relevant bodies including the Department of Housing, Local Government and Heritage and the Archaeology Section of Dublin City Council in advance of, and during, the subsequent construction stage of the Proposed Scheme. This engagement will continue to take their requirements into consideration, where aligned with and consistent with the EIAR.

2.9 Dublin City Council

Dublin City Council's (DCC) submission comprises 64 pages and is sectionalised numerically. For ease of reference the DCC section numbering, and sub-section numbering conventions have been retained throughout the NTA's response as set out in the following paragraphs.

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

A. Role of NTA & Liaison

B. DCC's Support for the Scheme

C. Certain Observations Raised / Clarification Sought by DCC

C1 – Response to Section 3.1 Relevant Planning History

C2 – Response to Section 3.2 Policy Context

C3 – Response to Section 4.0 Planning Assessment (sub-sections 4.1 to 4.6)

C4 – Response to Section 4.7 Departmental Reports

C5 – Response to Section 4.8 City Archaeologist

C6 – Response to Section 4.9 Parks, Biodiversity and Landscape Services

C7 – Response to Section 4.10 City Architect's Division

C8 – Response to Section 4.11 Conservation Section

C9 – Response to Section 4.12 Environment and Transportation Section

C10 – Response to Appendix 1 - Conditions

2.9.1 Introduction

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

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

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

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

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

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

a) to secure the provision of, or to provide, public transport infrastructure;

b) to enter into agreements with other persons in order to secure the provision of such public transport infrastructure, whether by means of a concession, joint venture, public private partnership or any other means; and

c) *to acquire and facilitate the development of land adjacent to any public transport infrastructure where such acquisition and development contribute to the economic viability of the said infrastructure whether by agreement or by means of a compulsory purchase order made by the Authority in accordance with Part XIV of the Act of 2000.*

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

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

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

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

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

2.9.3 Section B - Dublin City Council Policy Support for the Proposed Scheme

In its submission, DCC confirms policy support for the Proposed Scheme (Section 4.6 on page 14 of the submission) as follows:

> *"In general, the proposed scheme is supported by the high level policies in place in the current Dublin City Development Plan 2022-2028."*

DCC confirms (at page 11 of its submission) that the development of the Proposed Scheme

> *"will contribute and support continued improved integration of transport with land use planning and the delivery of improved high-capacity Core Bus Corridors will enable and support the delivery of both residential and economic development opportunities, facilitating the sustainable growth of Dublin City and its metropolitan area."*

In relation to regional planning policy, the NTA welcomes the acknowledgement by DCC (at page 7 of its submission) that, in terms of Regional Policy, the Proposed Scheme is supported by the Regional Spatial and Economic Strategy (RSES) as follows:

> *"The RSES includes a more detailed Dublin Metropolitan Area Strategic Plan (MASP) which identifies strategic development and employment areas for population and employment growth, in addition to more generalised consolidation and re-intensification of infill, brownfield and underutilised lands within Dublin City and its suburbs.*
>
> *The Dublin MASP sets out a list of key transport infrastructure investments in the Metropolitan Area as supported by National policy (RPO 8.7, RPO 8.9) to promote mobility management, sustainable transport use and the delivery of bus projects including Core Bus Corridors and Regional Bus Corridors. The cycling objectives include delivery of the cycle network set out in the NTA's Greater Dublin Area Cycle Network Plan and investment priorities for cycleways. Overall, the RSES supports the delivery of key sustainable transport projects including BusConnects as set out in RPO 5.2."*

In relation to the Dublin City Development Plan 2022-2028, the DCC submission (page 8) confirms that:

> *"Dublin City Council (DCC) supports the improvement of public transport and cycling which will allow for higher density development, thereby creating a more sustainable interaction between land-use and transport. Chapter 8 of the Development Plan 'Sustainable Movement and Transport' sets out DCC policies and objectives which are relevant to Bus Connects."*

In relation to the EIAR, DCC states (Section 4.2 at page 14 of its submission) that:

> *"A comprehensive EIAR has been submitted with the application examining the project under all relevant headings and finds generally that the development would not adversely impact on existing environmental amenities" and that "the content [of the EIAR] points generally to the development having negligible impact on the existing environment".*

In relation to zoning, the NTA notes that DCC sets out the view on page 14 of its submission that, "*public service installations*", which includes bus shelters, are compatible and consistent with the zoning objectives for the area.

On page 14 of its submission, in relation to amenities, DCC states: *"Dublin City Council is satisfied that the elements of the proposed scheme which fall within the administrative area of the Council would not have any excessive or undue impact on the amenities of the area".*

On page 25 of the DCC submission, the City Architects Division "*welcomes in principle the objectives of the Proposed Scheme to support sustainable transport use through infrastructure improvements for active travel (both walking and cycling) and the provision of enhances bus priority measures".*

Th City Architect's Division (at page 26) notes that: *"proposals for public realm upgrades, including widened footpaths, high quality hard and soft landscaping to contribute towards a safer, more attractive environment for pedestrians are included,.."*

The Environmental and Transportation Department of DCC set out (at page 45 of its submission) that: *"The Department is generally supportive of the improvements to bus and cycling infrastructure proposed in the overall context of encouraging a shift to sustainable mobility. In this regard the proposal generally aligns with the policies expressed in the"* Dublin City Development Plan.

DCC states further (on page 45) that, *"[t]he commitment by the NTA within the BusConnects project to afforded to the bus service is very much welcomed. The introduction of, for the most part, separated and segregated cycle ways is again welcomed…".* Dublin City Council goes on to state that this will provide better and safer cycling environment and help the bus maintain a steady speed and achieve its journey times.

Also, on page 45 of its submission, DCC states: *"The Traffic Section is supportive of the integrated sustainable transport proposals and recognises the significant improvements that they will bring in terms of safe cycling measures and in enabling an efficient public transportation service along these routes".*

On page 47 of the DCC submission, the Roads Division states: *"The Roads Department is generally supportive of the scheme and its intention to improve bus and cycling provision".*

2.9.4 Section C - Certain Observations Raised / Clarification Sought by DCC

While, as is evidenced from the DCC submission itself, and from the extracts from the DCC submission as outlined above in section B - DCC's support for the Scheme, DCC is supportive of the Proposed Scheme and the proposed improvements to public transport in support of the shift to sustainable mobility, DCC has also raised certain queries and observations that the NTA has considered and responds to below in the next section of this report.

These queries and observations are enclosed in Section 3 Context of Development and Section 4 "Planning Assessment" of the DCC submission. The queries and observations are included under a number of sub-headings and for ease of reference the DCC sub-section numbering convention has been retained throughout the following paragraphs.

3.0 Context of Development

3.1 Relevant Planning History

The DCC submission notes four planning applications (two of which are modification permission), for which permission was granted which are located adjacent to the Proposed Scheme:

4735/18 – 126-128 Harold's Cross Road Dublin 6W;

3420/21 – 126-128 Harold's Cross Road, Dublin 6W;

3619/20 – Site at 39, 40, 41, 42 & 42A Clanbrassil Street Upper, Dublin 8;

4249/22 – Site at 39 Clanbrassil Street Upper, Dublin 8.

The NTA note the planning applications along and adjacent to the route identified by DCC. From a review of the planning applications listed in the DCC submission it is considered that the construction and operation of these in combination with the Proposed Scheme, will not give rise to significant residual cumulative impacts.

It is also acknowledged in Section 5.9 of Chapter 5 of Volume 2 of the EIAR that interface liaison will be undertaken on a case-by-case basis with other projects if required to ensure that cumulative impacts are managed appropriately:

> *"Interface liaison will take place on a case-by-case basis through the NTA, as will be set out in the Construction Contract, to ensure that there is coordination between projects, that construction access locations remain unobstructed by the Proposed Scheme works and that any additional construction traffic mitigation measures required to deal with cumulative impacts are managed appropriately."*

3.2 Policy Context

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

The DCC submission confirms in relation to the Dublin City Development Plan 2022-2028, that the Proposed Scheme is consistent with 9 provisions in Chapter 8 of the Development Plan 'Sustainable Movement and Transport' that sets out policies and objectives which are relevant to Bus Connects

4.0 Planning Assessment

4.1 Planning Policy

The DCC submission concludes that "*the proposed scheme will contribute, and support continued improved integration of transport with land use planning and the delivery of improved high-capacity Core Bus Corridors will enable and support the delivery of both residential and economic development opportunities, facilitating the sustainable growth of Dublin City and its metropolitan area.*"

4.2. Environmental Impact Assessment Report (EIAR)

The NTA notes that DCC state that a comprehensive EIAR is provided with the application documents examining the Proposed Scheme under all relevant impacts.

4.3. Natura 2000

In relation to the NIS, the NTA notes that DCC stated (at page 12 of its submission) that the Natura Impact Statement submitted

> *"is generally satisfactory in terms of identifying the relevant Natura 2000 sites and the potential adverse impacts on the integrity of designated Natura 2000 sites along the Dublin coastline in view of their conservation objectives."*

DCC went on to state in its submission that:

> *"There is considered to be sufficient distance from the intended route of the bus corridor to SAC and SPA sites, and the avoidance, design requirements and mitigation measures set out in the NIS will ensure that any impacts on the conservation objectives of European Sites will be avoided during the construction and operation of the Proposed Scheme such there will be no adverse effects on any European Sites."*

The NTA notes that the North-West Irish Sea candidate Special Protection Area (cSPA, site code 004236) has recently been announced. Whilst it was announced after submission of the current planning application, it nonetheless adjoins existing SPAs from along the eastern seaboard, the majority of which e.g. South Dublin Bay and River Tolka Estuary SPA, North Bull Island SPA, Baldoyle Bay SPA, Howth Head Coast SPA, Ireland's Eye SPA, Malahide Estuary SPA, Rogerstown Estuary SPA, Lambay Island SPA, Skerries Islands SPA, Rockabill SPA are included within the assessment for the Proposed Scheme. While the bulk of the listed SCIs for the cSPA are largely coastal, a number can venture inland. However, their inclusion as part of the Appropriate Assessment would not alter the outcome of the assessment presented in respect of the Proposed Scheme, as the SCI's and potential impacts from within the vicinity of the Proposed Scheme have effectively been captured in the NIS submitted in support of the planning application.

4.4. Zoning and Other Designations

In relation to zoning, the NTA notes that DCC sets out the view on page 13 of its submission that the Proposed Scheme is compatible with the Z1, Z2, Z3, Z4, Z6, Z8, Z9, Z10, Z14 and Z15 zones along its route.

4.5. Impact on amenity

On page 14 of its submission, in relation to amenities, DCC stated: *"Dublin City Council is satisfied that the elements of the proposed development which fall within the Council Boundary would not have any excessive or undue impact on the amenities of the area"*.

4.6. Forward Planning Comment

The DCC submission noted that: *"the Proposed Scheme is supported by the high level policies in place in the Dublin City Development Plan 2022-2028."*

4.7 Departmental Reports

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

4.8 City Archaeologist

The submission notes that the Proposed Scheme runs adjacent to the River Poddle for much of its length and passes through a number of Zones of Archaeological Potential for Recorded Monuments which are listed on the Record of Monuments and Places (RMP) and are subject to statutory protection under Section 12 of the National Monuments (Amendment) Act 1994. The scheme will also impact sites listed on the Dublin City Industrial Heritage Record. Archaeological mitigation in these areas will be required where subsurface excavation is proposed, and this is acknowledged in the baseline environment description contained in Section 15.3.1.1 in Chapter 15 of Volume 2 of the EIAR and the potential impacts are assessed in Section 15.4.3.

The policies referenced by the City Archaeologist have been considered in the EIAR and have been set out in Appendix A15.4 in Volume 4 of the EIAR.

EIAR

The NTA notes DCC's summary of Chapter 15 of the EIAR and the proposed mitigation measures.

In particular the City Archaeologist referred to two locations along the Proposed Scheme:

a) ***"Stone Boat" / "The Tongue"*** in the River Poddle with a request to adapt the proposed boardwalk design to ensure visibility of the historic feature below.

The intention of the Proposed Scheme is to enhance public access to, and awareness of the *Stone Boat* feature in the River Poddle that will be visible underneath / beside the proposed boardwalk that will provide a new link for pedestrians and cyclists between the Mount Argus estate and Sundrive Road. It is intended in the design of the boardwalk to ensure that the *Stone Boat"* will be visible through the deck of the boardwalk. This can be partially seen in the image showing an oblique view along the boardwalk in Figure 2-9-1, where the mesh deck allows the grassy riverbank to be visible underneath the structure. NTA shares the aspiration of the City Archaeologist to maximise visibility of the *Stone Boat*, and this will be achieved through the selection of materials and the detailing of the structure.

Figure 2-9-1: Close-up view of the proposed Stone Boat Boardwalk

(EIAR Volume 3, Chapter 17, Figure 17.2.1.2)

In arriving at the proposal to provide a new link for cyclists and pedestrians at the Stone Boat, the NTA considered four alternatives for cycling along the route corridor. These are described in EIAR Volume 2, Chapter 3 Alternatives, Section 3.4.1.1.2 Cycling Options. The City Archaeologist has suggested an alternative design for the proposed boardwalk with a truncated length that would link through the car park at Mount Argus Square before passing over the *Stone Boat*. That arrangement would not be preferable as it would intrude extensively into the common area of a private residential development with the loss of some car parking spaces, along with the taking in charge of the access to duplex apartments. The Proposed Scheme design provides a simpler and more appropriate arrangement that would have minimal impact on the Mount Argus Square residential complex.

The submission comments on the proposals for public information panels at the Stone Boat:

> *"It is also stated that information panels will be installed. Two are shown on the provided drawings. No details of design or content are provided, however. These should be carefully designed and written, providing information not just on the immediate monument, but also allowing the viewer to situate it in its wider context of the River Paddle and the city's water supply. local groups have recently been in touch with the DCC Heritage Officer separately from the current Bus Connects proposal seeking to get interpretive signage installed at this location. Ideally, the information panels should be designed in conjunction with DCC and with input from local heritage groups."*

The NTA accepts these suggestions and will collaborate with Dublin City Council in relation to the *provision* of appropriate information panels at the Stone Boat.

b) **Robert Emmet Bridge**:
- Pedestrian access to the Robert Emmet Memorial on the eastern parapet.

It will no longer be possible for pedestrians to have direct access to view the memorial plaque on the eastern parapet of Robert Emmet Bridge, as the existing footpath will be replaced by a cycle track, and pedestrians will use the adjoining new footbridge on the other side of the parapet. To compensate for this, an information board will be provided on the proposed new footbridge with a photograph of the plaque.

- Impacts for the visual setting of the bridge and for historic walls.
NTA acknowledges the high-quality visual appearance of Robert Emmet Bridge with the distinctive balustraded parapets. In designing the proposed new footbridges the structure was arranged to align carefully with the key features of the existing bridge with a slim deck and glass parapets such that the old bridge will remain highly visible behind the new bridge. This is illustrated in Figures 2-9-2 showing the existing situation, and in Figure 2-9-3 showing the proposed situation. In addition, pedestrians (and cyclists on the western footbridge) will have a close-up view of the façade of the old bridge from the new footbridges so that they can better appreciate the aesthetics of the old bridge.

Figure 2-9-2: Existing View of Robert Emmet Bridge form the East

(EIAR Volume 3, Chapter 17, Figure 17.2.1.5)

Figure 2-9-3: Proposed View of Robert Emmet Bridge form the East

(EIAR Volume 3, Chapter 17, Figure 17.2.1.6)

In arriving at the proposal to widen the road at Robert Emmett Bridge, the NTA considered three alternatives as described in EIAR Volume 2, Chapter 3 Alternatives, Section 3.4.1.3.2. This assessment concluded that the most suitable arrangement would be to provide new footbridges on both sides of the existing road bridge, which would remain intact. To enable the continuation of bus lanes and cycle tracks along Clanbrassil Street Upper, it will be necessary to widen the road by approximately 4m where it is on embankment with a retaining

wall on the western side. There are no other reasonable alternatives to this road widening, apart from the omission of both bus lanes, which would cause a major interruption to the continuity of bus priority. This alternative was suggested in some submissions for which a response was provided earlier in Section 2.7 of this report.

For the proposed widening of Clanbrassil Street Upper on the western side of the road, it will be necessary to construct a new retaining wall as shown in Figure 2-9-4. The existing masonry parapet wall will be disassembled, and the materials will be reused in the parapet of the new wall. This is described in the EIAR Volume 2, Chapter 4, Section 4.5.3.8.1, in Chapter 5, Section 5.5.4.1.4, and in the Preliminary Design Report Section 8.5.1 (Supplementary Information). If all of the existing masonry retaining wall materials were to be salvaged as requested by the City Archaeologist, this would require very difficult temporary works for a sheet pile wall to be installed behind the existing wall with associated closure of half of the public road, which would cause major disruption for all road users over a long period of time. Such an arrangement would not be practicable. Instead it is proposed to face the new wall with masonry similar to the old wall.

At the abutments of Robert Emmet Bridge the new structures will be carefully integrated with the existing masonry wing walls so as to preserve as much as possible of the old structures.

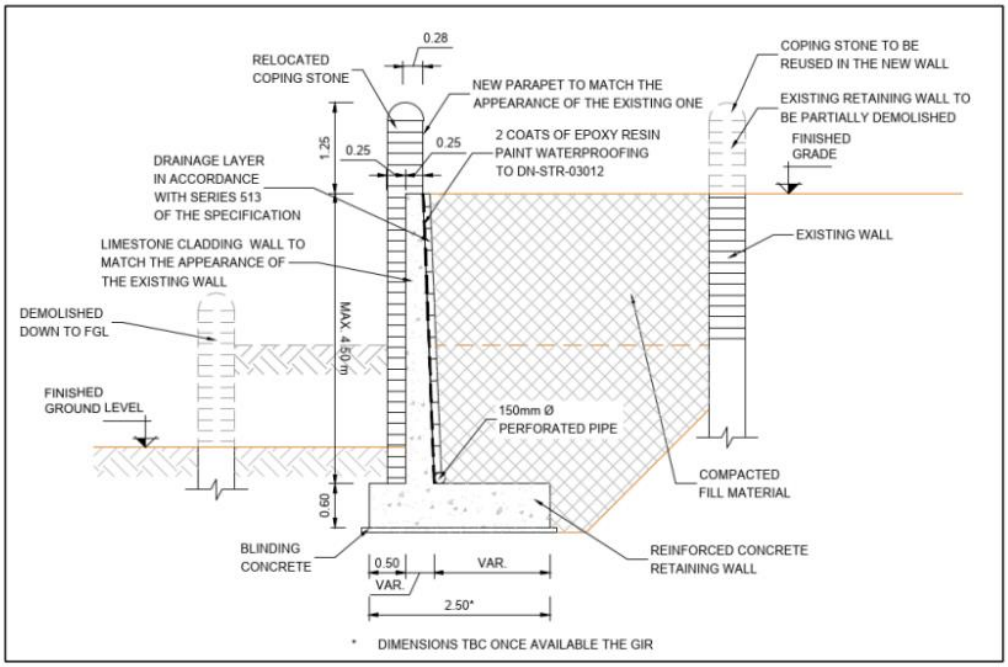


Figure 8.12: Kimmage 03 – Typical Cross Section of Retaining Wall

Figure 2-9-4: Cross-Section of the proposed retaining wall for the widening of Clanbrassil Street Upper (Supplementary Information, Preliminary Design Report)

Section 16.5.1.2 in Chapter 16 in Volume 2 of the EIAR sets out the mitigation which will implemented and acknowledges the residual impacts:

> *"…. Direct impacts within the Grand Canal Conservation Area will also include the proposed new cycle / pedestrian bridges on either side of Robert Emmet Bridge (NIAH 50080983) and alterations to the end walls of the bridge itself which is of Regional Importance and Medium Sensitivity. The alterations to the bridge and the supporting piers on the tow paths of the Grand Canal (CBC0011BTH042) will have a direct impact on the Conservation Area and its character. The Grand Canal Conservation Area is of Regional Importance and Medium Sensitivity. The pre-mitigation Construction Phase impact will be Direct, Negative, Moderate and Long-Term. The architectural heritage specialist will record, protect and monitor the bridge during the construction works in accordance with Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR. The proposed piling on the tow paths of the*

Grand Canal will also be monitored by the appointed contractor to ensure that no damage occurs to the Grand Canal, its tow path or the harbour to the west. The end walls of the bridge will be recorded in detail by the architectural heritage specialist before being carefully taken down. The materials will be retained for reuse and reinstated in place of the sections of the galvanised railings to the east and west of the bridge. This mitigation will ensure that the historic fabric of the 1930s end walls will be retained where practicable. Recording will be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor. The architectural heritage specialist will oversee the labelling, taking-down and reinstatement of the end walls. Works to historic fabric will be carried out in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR. This mitigation will reduce the magnitude of the impact from Medium to Low. The predicted residual Construction Phase impact will be Direct, Negative, Slight and Long-Term…."

4.9 Parks, Biodiversity & Landscape Services

This part of the DCC submission raises four issues of concern:

a) Objection to proposed cycle routes through Poddle Park and Mount Argus Park.
This element of the submission relates to superseded proposals that had been included in an earlier stage of the Proposed Scheme. Following the non-statutory public consultations and submissions received with concerns about intrusions into these two small public parks, the scheme design was adjusted to omit those aspects, and the cycle routes were revised.
b) Lack of details in proposals – further engagement requested.
NTA will continue to engage with all departments of Dublin City Council to address any concerns they may have about details of the Proposed Scheme.
c) Change some species of proposed trees to be planted and reduce numbers in certain places.
NTA will continue to engage with Dublin City Council Parks, Biodiversity & Landscape Services to confirm the most suitable species of trees to be planted in the Proposed Scheme.
d) Setting for stone cross at north end of Harold's Cross Park to be enhanced.
In the Proposed Scheme the small footpath area at this location will be enhanced as much as possible within the constraints on a small traffic island in a signal-controlled junction.

4.10 City Architect's Division

Pages 25 to 34 of the DCC submission.

General Assessment

NTA acknowledges that DCC's City Architect's Division welcomes *"in principle the objectives of the Proposed Scheme to support integrated sustainable transport use through infrastructure improvements for active travel (both walking and cycling), and the provision of enhanced bus priority measures"*. The submission also welcomes the various proposed public realm improvements. It is noted that there have been previous engagements with the BusConnects project office on numerous occasions during the design development for the Proposed Scheme.

This part of the DCC submission raises 16 particular issues:

1) Footpath widths and alignment
2) Public Realm Improvements
3) Land Acquisition by NTA and Taking in Charge
4) Bus shelter design
5) Siting of above-ground utility cabinets
6) Electric vehicle charging points
7) Palette of Materials for paving
8) Palette of street furniture
9) Boundary Treatments
10) New Pedestrian and Cycle Bridges

Emmet Bridge

Stone Boat Boardwalk

11) Per Cent for Art Strategy
12) Painted medians
13) Traffic signal and signage poles.
14) Public Lighting.
15) Water drinking fountains.
16) Village signage

Issue No.1: Footpath Widths

Issue Raised in DCC Submission

The DCC submission (on page 27) is as follows:

1. *"The provision of footpaths designed to the minimum width may not be sufficient in areas of high pedestrian traffic, particularly in urban villages and busy commercial streets, e.g. the footpath on Clanbrassil Street Lower (Sheet 09) and Harold's Cross Road (Sheet 07)."*
2. *"The removal of the footpath on Harold's Cross Road at the northern side of the park (Sheet 06) is generally not supported. If it is not possible to retain the footpath, it is suggested that the design of the junction of Harold's Cross Road and Kimmage Road Lower could be reviewed to provide a new pedestrian crossing running north-south on Kimmage Road Lower and into a proposed new entrance into the park."*
3. *"Footpath widths also need to account for congregations of passengers waiting in the vicinity of bus stops."*

Response to Issue Raised in DCC Submission

The Proposed Scheme consists mainly of modifications to the traffic layout along existing streets and roads. The existing footpaths are largely unaffected in the scheme proposals, and it was a key consideration not to reduce the existing footpath widths unless absolutely necessary. The existing footpath widths within the proposed scheme are generally more than satisfactory for the pedestrian traffic, which varies considerably along the various streets and roads. In the busiest parts of the route in Kimmage Village at the junction of Kimmage Rad Lower with Sundrive Road, and at the Leonard's Corner junction of Clanbrassil Street with South Circular Road (as shown in Figure 2-9-5), the footpaths are generally about 3m wide, and wider in some places.

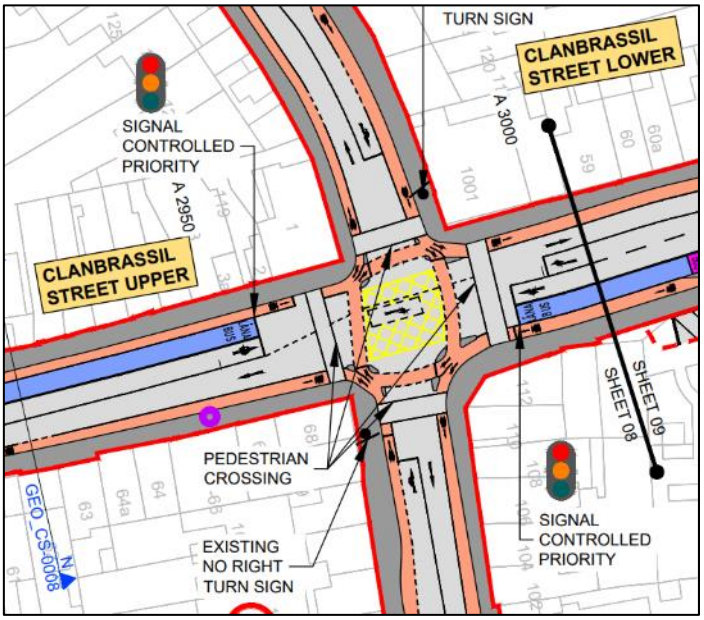


Figure 2-9-5: Proposed Scheme Layout at Leonard's Corner Junction

In general the footpaths along Clanbrassil Street Lower are unusually wide, especially north of Lombard Street West where the street was widened in the 1980's. However, there is a short 100m long section

of the street between Vincent Street South and Lombard Street West with existing footpaths that are only 1.8m wide in places. This section of street is very constrained, and the footpaths could not be widened. In the proposed scheme the northbound bus lane has been omitted along this section as can be seen in Figure 2-9-6. The cycle tracks will be reduced to 1.5m wide through this narrow section of street so as to fit in the limited space available between the existing kerbs, which will be retained. On this section of the Proposed Scheme all of the cross-section elements are at the minimum widths provided for under the relevant design standards, which is necessary due to the narrow width of the street.

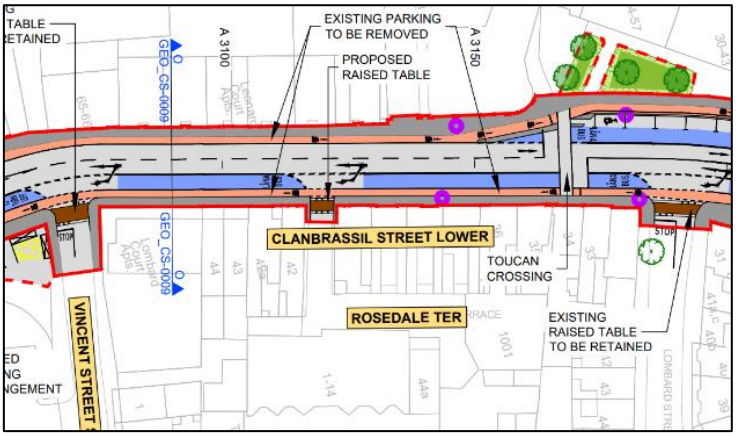


Figure 2-9-6: Proposed Scheme Layout at Clanbrassil Street Lower (Sheet 09)

Point No.2 in respect of footpaths appears to refer to the short link street at the southern end of Harold's Cross Park (not the northern end of the park) between Kimmage Road Lower and Harold's Cross Road as shown in Figure 2-9-7. In the Proposed Scheme this short link street will be widened on the northern side to accommodate two-way traffic properly, alongside the retention of existing on-street parking for the houses on the southern side. The widening will require removal of the existing footpath along the northern side of the road adjacent to the park. The alternative option of removing the existing parking on the southern side of the street would adversely affect the amenity of the residents of the period houses, most of which do not have driveways for off-street parking, in a context where there is a general severe lack of alternative parking available in the area.

This section of street carries a very small flow of traffic at present, but that will increase slightly due to the proposed bus gate on Kimmage Road Lower at the northern end of the park, which will divert local access traffic around the southern end of the park towards Mount Jerome Cemetery, Mount Argus Road and homes opposite the western side of the park. There are three existing gates into the park as shown on Figure 2-9-7, including one at the southwestern corner. NTA accepts the suggestion by DCC Architect's Division that an improved pedestrian crossing could be provided at the junction at the western end of the link street where it joins Kimmage Road Lower, and this is indicated as a red line for a raised platform which would operate as a "courtesy crossing" as described in the *Design Manual for Urban Roads and Streets (DMURS).*

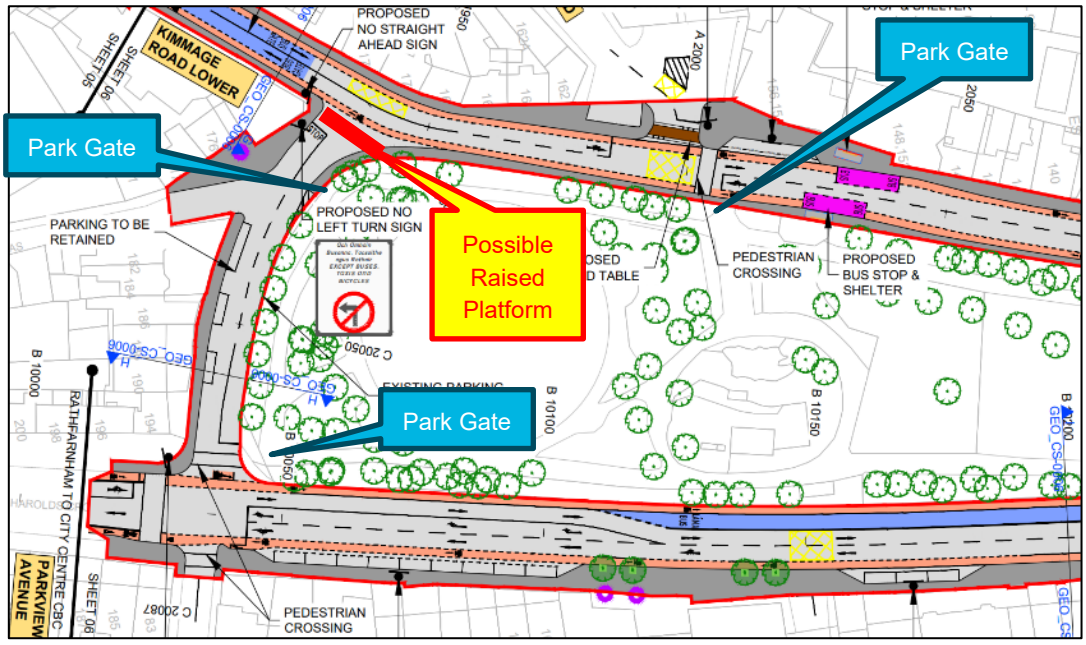


Figure 2-9-7: Snapshot from General Arrangement Drawing Sheet No.6

Island bus stops are proposed at appropriate places along the scheme where it is expected that generous waiting space is desirable to cater for congregations of passengers. Overall 12 of the 23 bus stops in the Proposed Scheme will have island bus stops.

Issue No.2: Public Realm Improvements

Issue Raised in DCC Submission

The DCC submission (on page 28) refers to two locations where the proposed scheme will provide public realm improvements but says that there is insufficient information provided.

Response to Issue Raised in DCC Submission

The aim of the Proposed Scheme is to provide enhanced walking, cycling and bus infrastructure on this key access corridor in the Dublin region, which will enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor. The Proposed Scheme will greatly improve transport services for all that live along the route of the Proposed Scheme by providing significantly improved sustainable transport options. Furthermore, it is an objective of the Proposed Scheme to ensure that the public realm is carefully considered in the design and development of the transport infrastructure and seek to enhance key urban focal points where appropriate and feasible.

As set out in Chapter 4 (Proposed Scheme Description) of Volume 2 of the EIAR, the landscape and urban realm proposals are derived from analysis of the existing urban realm which allowed the designers to consider appropriate enhancement opportunities along the route. The enhancement opportunities include key nodal locations which focus on locally upgrading the quality of the paving materials, extending planting, decluttering of streetscape and general placemaking along the route. Along the route there will be a number of enhancements to specific urban realm hot spots where there is a clear opportunity to improve existing key public spaces as illustrated in EIAR Volume 3, Figures, Chapter 4 Proposed Scheme Description Part 5 on the Landscape General Arrangement Drawings.

NTA will continue to liaise with DCC in regard to public realm improvements in the detailed design stage.

Issue No.3: Land Acquisition by NTA and Taking in Charge

Issue Raised in DCC Submission

The DCC submission (on page 28) is as follows:

Where it is proposed to CPO or acquire lands as part of the Proposed Scheme, confirmation is sought as to whether ownership of these lands will be transferred to the relevant local authority or will these lands be retained by the NTA but taken in charge by the relevant local authority for maintenance purposes."

Response to Issue Raised in DCC Submission

Under the provisions of the relevant legislation, the NTA has exercised certain powers under Section 44(2)(b) of the 2008 Act to the effect that the functions in relation to securing the provision of public transport infrastructure falling within Section 44(2)(a) of the 2008 Act (as amended) in relation to the CBC Infrastructure Works, should be performed by the NTA. Those functions include the design and construction of the Proposed Scheme and, effectively, the NTA becomes the road authority in respect of the exercise of those functions.

Under the relevant legislation, upon the completion of the construction of the Proposed Scheme the NTA automatically ceases to be the road authority and the status of DCC as the relevant road authority is automatically restored – it does not require the operation of the conventional "taking-in-charge" arrangements provided for elsewhere in legislation. Accordingly, the legislative provisions appropriately govern the arrangements for the NTA to commence the construction of the Proposed Scheme, subject to the necessary planning and environmental consents, and govern the restoration of the road authority function to the relevant local authority, in this case being Dublin City Council. Consequently all CPO lands acquired by NTA for purposes of the Proposed Scheme will be transferred to the relevant local authority.

Issue No.4: Bus Shelter Design

Issue Raised in DCC Submission

The DCC submission (on pages 28/29) is as follows:

"Bus shelters impact on the width of footpaths and should only be proposed where there Is sufficient space to physically accommodate them and passengers congregating in their vicinity."

"Bus shelter locations are Indicated on the drawings but information on their proposed design, size and type is not provided."

"The proposed location of new bus shelters in the vicinity of buildings of architectural Importance, in Conservation Areas, In Architectural Conservation Areas (ACA's), and Special Planning Control Schemes (SPCS) needs to be considered carefully considered." No specific locations are referred to in this regard."

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

Response to Issue Raised in DCC Submission

The location of each bus shelter / stop along the Proposed Scheme are shown on the General Arrangement Drawings (Chapter 4 Figures) in Volume 3 of the EIAR. Details on the design of these bus stops are outlined in Section 4.6.4.5 of Chapter 4 (Proposed Scheme Description) in Volume 2 of the EIAR. Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR considers and assesses the location of bus shelters / stops in proximity to Protected Structures and structures on the NIAH (see Section 16.4.4.1 of Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR). It concludes that the potential effects of bus shelters on Protected Structures is considered to be Neutral and Long-term.

Section 4.14.3 of the Preliminary Design Report, included in the Supplementary Information outlines the requirement for Bus Shelters as part of the Proposed Scheme as follows:

"Bus shelters provide an important function in design of bus stops. The shelter will offer protection for people from poor weather, with lighting to help them feel more secure. Seating will be provided

to assist ambulant disabled and older passengers and accompanied with Real Time Passenger Information (RTPI) signage to provide information on the bus services."

As such, bus shelters have been provided where practicable as part of the Proposed Scheme.

The proposed bus stop shelters, as shown in the *Preliminary Design Guidance Booklet for BusConnects,* are of a high-quality design, constructed largely of glass panels with slimline stainless-steel frames. They are discreet and highly transparent so as to have minimal visual impact on their surroundings. This type of bus shelter is widely used across Dublin and was designed for use in visually sensitive locations, including in proximity to protected structures and historic buildings. In this regard the DCC submission suggests potential negative impacts that will not arise.

Figure 2-9-8: Example of the proposed high-quality bus shelters for BusConnects

Similar high-quality design bus stop shelters are widely used across Dublin and are already in place beside protected structures and in conservation areas along the Proposed Scheme, so there will effectively be no change from the existing situations.

Issue No.5: Siting of Above-Ground Utility Cabinets

Issue Raised in DCC Submission

The DCC submission (on page 29) notes that the siting of utility cabinets, poles and other above-ground utility infrastructure may have significant impacts on the space, visual impact, and quality of the public realm.

Response to Issue Raised in DCC Submission

BusConnects will require minimal new utility cabinets unlike for example a LUAS light-rail tram line which involves overhead power lines and completely separate signalling and control system. Most of the utility requirements in the Proposed Scheme occur at traffic signal junctions where there are existing cabinets for traffic signal controllers, and for CCTV monitoring. Minor adaptation will be required of these cabinets and equipment in terms of their external appearance and positioning.

The NTA shares the concerns of DCC to minimise visual clutter along the core bus corridors. Significant efforts have been made during the design process to minimise above-ground utility infrastructure where practicable. Where such infrastructure is necessary it has been positioned in appropriate locations, and rationalised where practicable. Usually above ground cabinets are placed beside boundaries at the back of footpaths to be out of the way and visually discreet.

Issue No.6: Electric Vehicle Charging Points

Issue Raised in DCC Submission

The DCC submission seeks provision of on-street electrical charging facilities at parking spaces to be included in the Proposed Scheme.

Response to Issue Raised in DCC Submission

The Proposed Scheme is intended to provide enhanced facilities for public transport and active travel. It would not be appropriate in such a scheme to address the issue of on-street electrical charging facilities at parking spaces which is a separate matter for the local authority and the electrical supply utilities.

Issue No.7: Palette of Materials for Paving

Issue Raised in DCC Submission

The DCC submission (on page 30) comments on the proposals for footpath paving in general and with particular reference to Clanbrassil Street, with a request to replace in-situ concrete footpath paving with paving slabs instead.

Response to Issue Raised in DCC Submission

The existing footpaths and paved areas along the Proposed Scheme are generally of high-quality and in good repair. The general intention in the Proposed Scheme is to retain all existing good quality paved areas, unless they are necessarily disturbed by the proposed works, and to replace like with like. In relation to Clanbrassil Street Upper as shown on Sheet 8 of the drawings for Landscaping and Urban Realm (EIAR Volume 3, Chapter 4, Part 5), in the Proposed Scheme it is intended to replace the existing paving materials on a like-for-like basis, which will be consistent with the arrangements in the general locality where higher quality paving is focussed on key areas such as the Leonard's Corner junction and the Grand Canal bridge, while all other footpaths are standard in-situ concrete.

NTA will continue the very positive and constructive liaison with DCC City Architects Department throughout the procurement and construction process including in relation to the final detailing of footpath paving materials.

Issue No.8: Palette of Street Furniture

Issue Raised in DCC Submission

The DCC submission (on page 30) requests a full palette of street furniture and seeks confirmation as to whether an identical palette is to be used for the proposed scheme across all local authority areas or whether each local authority, or even each urban village, will have a specific palette. It is further requested that confirmation be provided on whether there will be uniformity in the palette of street furniture across all BusConnects Core Bus Corridor Schemes.

Response to Issue Raised in DCC Submission

Section 16.5.1.7 of EIAR Volume 2 Chapter 16 Architectural Heritage includes details of the impacts on existing street furniture of heritage value due to the Proposed Scheme, including post boxes, lamp posts and statuary and other street furniture. NTA will continue the very positive and constructive liaison with DCC City Architects Department throughout the procurement and construction process including in relation to the final detailing of new street furniture.

Issue No.9: Boundary Treatments

Issue Raised in DCC Submission

The DCC submission (on page 31) notes that where property boundaries are to be relocated to facilitate land acquisition, the fabric of existing boundaries should be assessed for their architectural conservation value and cultural value. DCC note that this assessment should consider whether the fabric, which may include railings, walls etc. is suitable for repair and reuse for sustainability reasons in the new boundaries rather than replaced with new.

Response to Issue Raised in DCC Submission

Section 13.5 of the Preliminary Design Report (Supplementary Information) notes the following:

> *"To maintain the character and setting of the Proposed Scheme, the approach to undertaking the new boundary treatment works along the corridor is replacement on a 'like for like' basis in terms of material selection and general aesthetics unless otherwise noted on the drawings."*

Proposed boundary modifications have been assessed as part of the Architectural Heritage assessment outlined in Chapter 16 of the EIAR, with appropriate mitigation measures outlined where necessary. For example, Section 16.5.1.1 addresses the mitigation that will be implemented with respect to protected structures:

> *"….Mitigation to offset the risk of damage will include recording, protection and monitoring of the boundaries which are located in close proximity to the proposed works by an appropriate architectural heritage specialist engaged by the appointed contractor, prior to and for the duration of the Construction Phase, in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR….."*

Issue No.10: New Pedestrian and Cycle Bridges

Issues Raised in DCC Submission

The DCC submission (on pages 31 to 33) refers to the proposed new pedestrian and cycling bridges at two locations and outlines a number of comments and queries:

- Emmet Bridge, Grand Canal:
  - Design Statement for the proposed new bridges adjacent to a landmark bridge.
  - Consideration of the future extension of the canal tow path on the northern side.
  - Maximise the space between the new bridges and the old bridge.
  - Comments on the aesthetics of the new bridges.
  - Architectural Heritage Impact Statement requested.
  - Interfaces between old and new elements.
- Stone Boat Boardwalk: *"It is not clear from the information provided how the under croft of the bridge will be designed so that it does not attract anti-social behaviour."*

Response to Issues Raised in DCC Submission

A simple summary design statement for the proposed new footbridges beside Robert Emmet Bridge is provided in EIAR Volume 2, Chapter 4, Section 4.5.3.8:

> *"The cycle / pedestrian bridge decks will be in perforated steel to allow drainage to the canal beneath and will be supported on a pair of longitudinal steel beams (0.5m in depth). The depth of the new bridges will be similar to that of the existing arch at the mid-span section, so the vertical clearance over the canal will remain the same. Glass parapets will retain visibility of the existing distinctive balustrades on the existing Robert Emmet Bridge."*

The earlier response to comments on the same subject by the City Archaeologist was provided in Section 4.8 as follows:

> *NTA acknowledges the high quality visual appearance of Robert Emmet Bridge with the distinctive balustraded parapets. In designing the proposed new footbridges the structure was arranged to align carefully with the key features of the existing bridge with a slim deck and glass parapets such that the old bridge will remain highly visible behind the new bridge. This is illustrated in Figures 2-9-2 showing the existing situation, and in Figure 2-9-3 showing the proposed situation. In addition, pedestrians (and cyclists on the western footbridge) will have a close-up view of the façade of the old bridge from the new footbridges so that they can better appreciate the aesthetics of the old bridge.*

The Proposed Scheme could be integrated into a future westward extension of the *Grand Canal Cycle Route* along the northern towpath if that is proposed by Dublin City Council, following an appropriate Option Selection process to determine where such a route should best be located.

The separation between the proposed new footbridges and Robert Emmet Bridge is tightly constrained by the necessity to tie-in to the adjoining streets and junctions. This space has been maximised as much as possible and will be approximately 1m.

An Architectural Heritage Impact Assessment is provided in EIAR Volume 2, Chapter 16 Architectural Heritage, and the residual impact following mitigation is summarised in Table 16.20 as "Indirect, Negative, Slight, Long-Term".

There is already a mix of old and relatively new elements at Robert Emmet Bridge and the adjoining walls and railings linking to Parnell Road, Grove Road, Clanbrassil Street Upper and Windsor Terrace at the four corners of the bridge. The masonry retaining wall along the western side of Clanbrassil Street Upper dates from the 18th century when the Grand Canal was constructed, and it interfaces with the early 20th century concrete bridge over the canal, and with late 20th century elements at the other three corners where there are modern steel railings on top of concrete dwarf walls. In the Proposed Scheme the new footbridges will be carefully integrated with the adjoining features of varying age and type.

At the Stone Boat Boardwalk there will be relatively little clearance under the structure where it will be close to ground level along the western side adjoining Mount Argus Square. The bank of the River Poddle falls steeply down to the river channel, as shown in the photograph in Figure 2-9-, and the clearance under the structure will be greater at the eastern edge, with up to 1.5m. As the deck will be perforated with an open grid to allow rain to fall through, as well as to provide visibility of the *Stone Boat* feature, there will be no shelter provided underneath. This situation would be most unlikely to attract anti-social behaviour for those reasons.

Figure 2-9-9: River Poddle at the proposed Stone Boat Boardwalk

Issue No.11: Per Cent for Art Strategy

Issue Raised in DCC Submission

The DCC submission (on page 33) is as follows:

> *"It is not clear where the Percent for Art Strategy is to be Incorporated into this project."*

Response to Issue Raised in DCC Submission

NTA will continue the very positive and constructive liaison with DCC City Architect's Department throughout the procurement and construction process including consideration of the provision of potential items of public art where appropriate.

Issue No.12: Painted medians

Issue Raised in DCC Submission

The DCC submission (on page 33) is as follows:

> *"The painted median along Kimmage Rd Lower should be reviewed to provide additional greening between Larkfield Ave and Priory Rd if possible or alternatively the median space removed and reallocated into the footpaths adjacent."*

Response to Issue Raised in DCC Submission

In the Proposed Scheme the existing road layout will be generally retained along Kimmage Road Lower between the bus gates where the traffic will be greatly reduced, and further interventions are not required for bus priority or cycling facilities as described in the response to the submission by the Dublin Commuter Coalition (Section 2.10 of this document). A localised section of the existing painted median will be removed at the junction with Mount Argus View where the junction will be upgraded to benefit pedestrians and cyclists.

Issue No.13: Traffic signal and signage poles

Issue Raised in DCC Submission

DCC notes that the number of traffic signal poles at junctions should be rationalised to the minimum required in order to reduce the visual impact.

Response to Issue Raised in DCC Submission

The NTA notes this comment. Significant efforts have been made during the design process to minimise above-ground infrastructure, including traffic signal poles, where practicable. Where such infrastructure is necessary, it has been placed in appropriate locations, and rationalised where practicable.

Issue No.14: Public Lighting

Issue Raised in DCC Submission

The DCC submission comments that there are a number of existing heritage lamp standards along Clanbrassil Street which should be retained.

Response to Issue Raised in DCC Submission

All heritage lamp standards have been identified in the Proposed Scheme and these will be retained where practicable and if they are in a suitable condition to be structurally safe or relocated in close proximity to their existing positions where necessary.

Section 16.5.1.6.2 in Chapter 16 sets out the mitigation that will be implemented with respect to lamp posts:

> *"….Mitigation consists of the recording of the lamp posts in position prior to the works, the labelling of the affected fabric prior to its careful removal to safe storage, and their reinstatement in new positions in close proximity (within 2m) of their existing positions. Recording will be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor. The architectural heritage specialist will oversee the labelling, taking down and reinstatement of the lamp posts. Works to historic fabric will be carried out in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR….."*

Issue No.15: Water Drinking Fountains

Issue Raised in DCC Submission

The DCC submission (on page 34) describes a recently adopted new policy to provide public drinking water fountains across the city, which could potentially be included in the Proposed Scheme.

Response to Issue Raised in DCC Submission

The NTA can liaise further with DCC on this matter to explore the possibility of inclusion of public drinking water fountains in the Proposed Scheme where appropriate.

Issue No.16: Village signage

Issue Raised in DCC Submission

DCC noted that existing 'Welcome to Village xxx' signage should be retained, in agreement with the local authority and community. It is the intention of the Proposed Scheme to retain all such signage.

Response to Issue Raised in DCC Submission

All such existing information signs will be retained in the Proposed Scheme.

The NTA notes the general comments on the Proposed Scheme in this section and the recommendations in the Appendix. NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC City Architects Department comments as these matters were the subject of extensive liaison throughout the design development process. NTA will however continue the very positive and constructive liaison with DCC throughout the procurement and construction process.

4.11 Conservation Section

Pages 34 to 45 of the DCC submission raised the following issues.

1) Existing mature and historic trees to be protected.
2) Masonry wall on Clanbrassil Street Upper to be reconstructed rather than buried in road widening.
3) Historic street features listed for protection.
4) Cycle lanes surfacing not to be red coloured at protected structures and in Architectural Conservation Areas.
5) Omit gantry signs at protected structures and in Architectural Conservation Areas.
6) Bus stops and shelter designs to reflect historic settings.

General Response for Conservation

The Conservation Section references a number of policies from the Dublin City Development Plan 2022-2028: Section 16.3.1 in Volume 2 of the EIAR sets out summary of the architectural heritage assets in the receiving environment of the Proposed Scheme and references the relevant policy from the DCC Development Plan as appropriate. All of the above policies (except BHA24) mentioned by the Conservation Section in their response are referenced in Section 16.3.1 of the EIAR. BHA24 relates to the reuse and any refurbishment of historic buildings. It is not considered that the works proposed as part of the scheme will give rise to non-compliance with this policy.

Architectural Heritage Protection Guidelines for Planning Authorities 2011 [4.10.2.3] The Conservation Section references the Architectural Heritage Protection Guidelines for Planning Authorities 2011 with regard to consideration of proposals affecting boundary features. These guidelines are referenced in the EIAR Volume 2 (Main Chapters, Chapter 16 Architectural Heritage). For instance, in Section 16.5 (Mitigation), it is acknowledged that EIAR Volume 4 Appendices Part 4 of 4, Appendix A16.3 (Methodology for Works Affecting Sensitive and Historic Fabric), has been prepared in accordance with the above guidelines. Department of Culture, Heritage, and the Gaeltacht – Technical Advice Series

[4.10.2.4] The Conservation Section references the following guidelines - Paving: The Conservation of Historic Ground Surfaces (2015) and that these should be used to guide any interventions. These guidelines are referenced in EIAR Volume 2 Main Chapters, Chapter 16 Architectural Heritage. For instance, in Section 16.5 (Mitigation), it is acknowledged that EIAR Volume 4 Appendices Part 4 of 4, Appendix A16.3 (Methodology for Works Affecting Sensitive and Historic Fabric), has been prepared in accordance with these guidelines. The Conservation Section also references the guidelines: Iron – the repair of wrought and cast iron. These guidelines are included in the reference list in Appendix A16.3 (Methodology for Works Affecting Sensitive Fabric) and have informed the preparation of the appendix.

Findings of the Conservation assessment General response [4.10.3.1] The NTA acknowledge that the Conservation Section submission generally welcomes the "comprehensive assessment of architectural heritage, streetscape and urban environment submitted as part of the EIAR and the proposed mitigation measures across the scheme". It is noted that the Conservation Section finds the inventory of architectural heritage sites recorded in Appendix A16.2 in Volume 4 of the EIAR to be comprehensive and accurately describes the quality and status of the heritage structures along the proposed route. The NTA further acknowledge the finding of the Conservation Section that a very thorough study of the receiving environment has been carried out. Tallaght / Clondalkin to City Centre Core Bus Corridor Scheme 465 The Conservation Section generally agrees with the EAIR findings regarding mitigation and protection measures and that once these measures have been carried out there will be no significant adverse residual impacts on the architectural heritage resource.

Issue No.1: Mature Trees

Issue Raised in DCC Submission

The DCC submission requests that mature and historic trees will be protected, but it does not identify any such trees along the Proposed Scheme.

Response to Issue Raised in DCC Submission

There are few street trees along the Proposed Scheme, and none are of historic significance. In general the Proposed Scheme intends to increase the number of street trees where possible and will provide new trees in numerous places to enhance the urban landscape. It will be necessary to remove a small number of existing trees where the road layout will be adjusted, but these are generally small specimens, and they will mostly be replaced by new trees to be planted in the same general area.

Section 4.6.11.5 describes the typical planting typologies that will be employed on the Proposed Scheme. With regard to new street trees, in Section 4.6.11.5.1, it states that: "Typically, trees will be semi-mature and where appropriate, selected for having a clear stem height to facilitate visual permeability.". With regard to new woodland/parkland areas and tree groups, Section 4.6.11.5.2 states:

> *"…..Elsewhere along the Proposed Scheme, there are smaller areas of existing and proposed woodlands and tree groups that will be retained, reinstated or established in order to provide appropriate landscaping connectivity and design interventions at a range of different spaces, including carriageway boundaries, new landscape spaces arising from junction reconfiguration, reinforcement of established vegetation areas, and also establishing new public realm and landscape opportunity areas. Tree species will be determined by location and will comprise either native woodland trees as set out above, or selected street trees. Additionally, understory planting, long grass and swathes of bulbs will be provided to reinforce the character of landscaped areas along the scheme corridor. A number of different landscaped central median areas exist along the Proposed Scheme, including those within high capacity dual carriageway and smaller scale medians within suburban and urban settings. Landscaping proposals respond to the different localities and may include grass planting, hedgerows and trees as appropriate in medians within the larger scale roadways, and grasses, ornamental planting, hedgerows and trees within the suburban and urban medians.…"*

Section 17.5.1 in Chapter 17 of Volume 2 of the EIAR sets out the mitigation measures to be implemented. In relation to trees it states:

> *"…. • Trees and vegetation to be retained within and adjoining the works area will be protected in accordance with the British Standard Institution (BSI) British Standard (BS) 5837:2012 'Trees in*

relation to in relation to design, demolition and construction - Recommendations' (BSI 2012). Works required within the root protection area (RPA) of trees to be retained will follow a project specific arboricultural methodology for such works, which will be prepared / approved by a professional qualified arborist. For details of trees to be retained refer to Tree Protection Plans which are contained within Appendix A17.1 Arboricultural Impact Assessment in Volume 4 of this EIAR

• Wherever practicable, trees and vegetation will be retained within the Proposed Scheme. Trees and vegetation identified for removal will be removed in accordance with 'BS 3998:2010 Tree Work – Recommendations' (BSI 2010) and best arboricultural practices as detailed and monitored by a professional qualified arborist. For details of trees and vegetation to be removed, refer to the Tree Protection Plans within Appendix A17.1 Arboricultural Impact Assessment in Volume 4 of this EIAR and the Landscape General Arrangements (BCIDD-ROT-ENV_LA-0011_XX_00-DR-LL-9001 in Volume 3 of this EIAR). The Arboricultural Assessment prepared for the Proposed Scheme will be fully updated by the appointed contractor at the end of the Construction Phase and made available, with any recommendations for on-going monitoring of retained trees during the Operational Phase;."

Section 17.5.2.1, Table 10 in Chapter 17 in Volume 2 of the EIAR sets out the predicted operational phase townscape/streetscape and visual impacts. With respect to trees the predicted residual impact is assessed as being neutral, Slight and Short-term (at year 1 post construction) and Positive Slight/Moderate and Long-term (15 years post construction).

Issue No.2: Masonry Wall on Clanbrassil Street

Issue Raised in DCC Submission

The DCC submission is as follows:

"The historic masonry retaining walls (NIAH 50080982) on the west side of Clanbrassil Street Upper will be directly impacted by the proposed scheme. The lower wall is proposed to be demolished and the upper wall buried behind new fill material to facilitate road widening to the north of Robert Emmet Bridge. A new retaining wall is proposed to be built in their place. This is poor conservation practice."

Response to Issue Raised in DCC Submission

This same issue was raised in Section 4.8 of the DCC submission by the City Archaeologist for which the response by NTA is:

If all of the existing masonry retaining wall materials were to be salvaged as requested by the City Archaeologist, this would require very difficult temporary works for a sheet pile wall to be installed behind the existing wall with associated closure of half of the public road, which would cause major disruption for all road users over a long period of time. Such an arrangement would not be practicable. Instead it is proposed to face the new wall with masonry similar to the old wall.

The photographs in Figure 2-9-10 show the existing retaining wall along Clanbrassil Street Upper on the western side. In the foreground of the upper photograph can be seen the 20th Century concrete wall at Robert Emmet Bridge which extends as far as the gate of Gordon's Fuels. In the background the older 18th Century wall extends northwards. The lower photograph shows the character of the 18th Century wall, which is constructed in random rubble siltstone and limestone, with a cut granite coping.

Figure 2-9-10: Retaining Wall on Clanbrassil Street Upper (Lower image from Google Earth)

Due to the constraints of a very busy urban road on a major radial route into Dublin City it will not be practicable to deconstruct this wall and to rebuild it several metres to the west. The upper parapet element will be salvaged and reconstructed in line with good conservation practice, which is as much as will be possible for this historic feature.

Section 16.5.1.2 in Chapter 16 in Volume 2 of the EIAR sets out the mitigation which will implemented and acknowledges the residual impacts:

> *"….Mitigation will include the careful recording of both of the walls located on the western side of R137 Clanbrassil Street Upper. The component masonry will be labelled before any removal or deconstruction occurs. The parapet and coping to the wall which fronts directly on the west side of R137 Clanbrassil Street Upper and is a continuation of the bridge, will be taken down. The remaining portion of the wall fronting directly on to the R137 Clanbrassil Street Upper below the level of road will be retained in its present location and buried within the widened road. The steps and the wall directly to the west of it are also to be taken down. The materials will be retained for reuse and stored in a secure location for the duration of the works. A new retaining wall of similar construction will be constructed in the lane to Gordon's Fuels. The parapet will be rebuilt using the limestone masonry and granite coping from the original 1790s walls. The steps will be reused in the proposed landscaping and urban realm works, thus ensuring that the historic fabric of the walls and steps is retained and reused on the new alignment. Recording will be undertaken by an appropriate architectural heritage specialist engaged by the appointed*

contractor. The architectural heritage specialist will oversee the labelling, taking down and reinstatement of the walls. Works to historic fabric will be carried out in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR. This mitigation will reduce the magnitude of the impact from High to Medium. The predicted residual Construction Phase impact will be Direct, Negative, Moderate and Long-Term…."

Issue No.3: Historic Street Features

Issue Raised in DCC Submission

The DCC submission notes various historic street features that should be preserved and protected.

Response to Issue Raised in DCC Submission

NTA acknowledges the importance of protecting all historic street features where possible, and this is addressed in the EIAR, Volume 2, Chapter 16 Architectural Heritage. Section 16.5.1.6 sets out the mitigation which will be implemented for street furniture (post boxes, lamp posts, statuary, and miscellaneous street furniture).

Issue No.4: Cycle Lane Surfacing

Issue Raised in DCC Submission

The Conservation Section request that where the cycle ways are located in close proximity to Protected Structures and within Architectural Conservation Areas generally, that an alternative high quality cycle lane surface is provided in-lieu of red tarmacadam.

Response to Issue Raised in DCC Submission

The DCC Conservation Section request for an alternative high quality cycle lane surface in-lieu of red tarmacadam in certain locations is impractical in a city where this would require a change of the cycle track surfacing at numerous places. It is questionable if worthwhile benefit would derive from such superficial arrangements on the main arterial streets and roads in the Proposed Scheme. To locally modify the cycle track surface would be inconsistent, and it would diminish the effectiveness of distinguishing that part of the road visually to increase awareness of vehicle drivers of the need to safeguard the road space allocated to cyclists for safety reasons.

Section 5.5 of the BusConnects Preliminary Design Guidance Booklet, included EIAR Appendix A4.1 in Volume 4 Part 1 of 2 states the following in relation to the proposed cycle track material:

"As illustrated in Figure 8, the use of machine laid asphalt for the cycle track has proven to be an effective way of providing a high level of service with a safe, smooth and continuous surface. This, however, offers very little contrast to the adjacent carriageway, and depends on the type of edge kerb and the presence of road markings to offer a visual differentiation between the carriageway and the cycle track. Consideration should be given to including an additional colour contrast to the cycle track in the form of an alternative-coloured asphalt (e.g. red, buff, etc) or adding coloured chips to the asphalt surface during installation (e.g. red chip). Designers should refer to section 5.6 of the NCM for further guidance on appropriate cycle track materials. At junctions, the chosen cycle track material should be continued (as a surface course layer) through the junction for consistency. Alternatively, coloured epoxy resin (cold-applied anti-skid layer) is a robust alternative measure in terms of longevity and maintenance for making cycle lanes more conspicuous at junctions."

In summary, the use of red coloured asphalt, or red coloured epoxy resin has been specified for all cycle tracks across the BusConnects Infrastructure Works to ensure legibility and conspicuity of the proposed cycle tracks and to ensure safety for vulnerable road users.

Issue No.5: Gantry Signs

Issue Raised in DCC Submission

The DCC submission is as follows: Omit gantry signs at protected structures and in Architectural Conservation Areas.

Response to Issue Raised in DCC Submission

Gantry signs are large features with elevated frames supporting information panels and they are common on motorways, but they are rarely used on normal urban streets where they would be inappropriately visually intrusive. There are no gantry signs included in the Proposed Scheme, so this issue does not apply.

Traffic signal gantry poles will be provided at some junctions in the Proposed Scheme where necessary for safety to ensure visibility of signals to drivers in locations where the road is quite wide. These signal gantry poles are small and visually discreet (similar to lamp posts and other normal street furniture), and they are commonly used throughout the city, especially on wider streets with four or more traffic lanes so as to ensure that drivers in the centre lanes can properly see the traffic signals. In recent years as central traffic islands have been removed from many streets, gantry signal poles have been installed to ensure suitable visibility of the signals for road safety reasons, as shown in the example in Figure 2-9-11.

Figure 2-9-11: Example of a gantry traffic signal in Donnybrook (Google Earth)

Issue No.6: Bus Stop Shelters

Issue Raised in DCC Submission

The DCC submission requests that bus stop shelter designs should reflect historic settings.

Response to Issue Raised in DCC Submission

Refer to the response to the same issue raised by the City Architect's Division in Section 4.10 / Issue No.4.

4.12 Environment and Transportation Section

Pages 45 to 52 of the DCC submission consists of commentary from the Traffic Division, Roads Department, and Environmental Protection Division.

An overall statement of support for the Proposed Scheme is provided at the beginning of this section of the DCC submission:

> *"The Department is generally supportive of the improvements to bus and cycling infrastructure proposed in the overall context of encouraging a shift to sustainable mobility. In this regard the proposal generally aligns with the policies expressed in the Dublin City Development Plan".*

Traffic Division

Issue Raised in DCC Submission

The DCC submission confirms that the DCC Traffic Signal System will support bus priority at junctions and states that camera-based bus lane enforcement will be essential.

Response to Issue Raised in DCC Submission

NTA welcomes the expression of support from the DCC Traffic Division and shares the concern about enforcement measures required to protect bus priority.

Roads Department

The following issues are noted in this part of the DCC submission.

1) Ensure new street trees do not obstruct footpath with 2m clear width.
2) Trees at junctions not to impede sightlines for traffic.
3) On-street parking bays need to be 2.4m wide, not 2.3m.
4) Access for loading through bus gate.
5) Road layout on Harold's Cross Road at St. Clare's development – reflect planning conditions.
6) Concern about removal of footpath at southern end of Harold's Cross Park.
7) Clarify use and control of the proposed car park at Our Lady's Hospice.
8) Modify proposed parking at junction with Mount Drummond Avenue.
9) Some heritage features in cycle tracks.

Issue No.1: Trees and Footpaths

Issue Raised in DCC Submission

The DCC submission raises a concern about the provision of new trees in the footpath on the western side of Kimmage Road Lower in the section north of Kimmage Crossroads (GA Sheet 1), which might reduce the effective footpath width to less than 2m. It also mentions a similar concern on Sheet 3 to the south of the junction with Larkfield Avenue.

Response to Issue Raised in DCC Submission

The Preliminary Design Report for the Proposed Scheme (Supplementary Information) in Table 4-2 details the widths of the road elements. Between Chainage A0+080 and A0+240 on the western side of the street the proposed footpath will be wider than 3m and can easily accommodate the proposed trees without impeding the effective footpath width. South of the junction with Larkfield Avenue in the Proposed Scheme new street trees will be provided in buildouts into the proposed parking bay outside of the 2m wide footpath.

Issue No.2: Trees and Parking at Junctions

Issue Raised in DCC Submission

The DCC submission queries the provision of some trees at the junction of Mount Argus View with Kimmage Road Lower, and at the access to Mount Argus Church, as well as parking at this junction (GA Sheet 4) in terms of potential obstruction of sightlines for traffic.

Response to Issue Raised in DCC Submission

The proposed trees are located quite far back from the edge of the main road and well behind the 2.4m setback required for the necessary sightlines as defined in the *Design Manual for Urban Roads and Streets*.

There is existing perpendicular parking on each side of the entrance to Mount Argus Church, which is retained in the Proposed Scheme, but with the addition of corner buildouts at the junction to better enclose the parking spaces. The *Design Manual for Urban Road and Streets (DMURS)* includes examples of such a parking arrangement on page 118 as shown in Figure 2-9-12, which are in a development by Dublin City Council in Ballymun. There should therefore be no concern in relation to this aspect of the Proposed Scheme.

Figure 4.75. Example from Ballymun, Co. Dublin

Figure 2-9-12: Extract from the Design Manual for Urban Roads and Streets (page 118)

Issue No.3: Parking Bay Widths

Issue Raised in DCC Submission

The DCC submission states that parking bays should be 2.4m wide.

Response to Issue Raised in DCC Submission

In the Proposed Scheme a new parking bay will be provided on the eastern side of Kimmage Road Lower south of the junction with Larkfield Avenue. This parking bay will be 2.3m wide as that is the maximum space that can be provided without narrowing the footpaths below 2m wide, or the traffic lanes below 3m wide, which are minimum widths in accordance with the design standards. Most cars are less than 2.4m wide, and if an occasional larger vehicle protrudes slightly into the road, this will be of little consequence on a road with low traffic volumes in a 30 km/h speed limit between the proposed bus gates.

Issue No.4: Access for Loading at Bus Gate

Issue Raised in DCC Submission

The DCC submission queries the access arrangement to the loading bay on Kimmage Road Lower at Harold's Cross shown on General Arrangement Sheet 6.

Response to Issue Raised in DCC Submission

This loading bay will be accessed from the south only, as northbound traffic will be restricted at the proposed bus gate at the northern end of the street. Exit traffic from the bus gate can continue northwards through the bus gate before 6am and after 10am.

Issue No.5: Harold's Cross Road at St. Clare's development

Issue Raised in DCC Submission

The DCC submission notes that the planning permission for the major development at St. Clare's on the eastern side of Harold's Cross Road includes a number of proposed adjustments to the street layout and the relocation of a bus stop.

Response to Issue Raised in DCC Submission

The drawings for the Proposed Scheme indicate the existing street layout on Harold's Cross Road at this location. This does not preclude the adjustment of the street layout in accordance with a separate planning consent.

Issue No.6: Footpath at Southern End of Harold's Cross Park

Issue Raised in DCC Submission

The DCC submission says that "*There are serious concerns regarding the removal of the footpath along the southern boundary of Harold's Cross Park and the absence of crossing facilities for pedestrians to link to the opposite footpath.*"

Response to Issue Raised in DCC Submission

The same concern was raised by the City Architect's Department. Please refer to the earlier response in Section 4.10 for Issue No.1.

Issue No.7: Car Park at Our Lady's Hospice

Issue Raised in DCC Submission

The DCC submission queries various aspects of the proposed car park at Our Lady's Hospice and the access arrangements.

Response to Issue Raised in DCC Submission

The proposed small public car park is included in the Proposed Scheme as a replacement for existing on-street parking immediately nearby that will be removed for the provision of a cycle track. This car park will be on land acquired for the scheme and will become part of the public road under the control of Dublin City Council. The proposed car park at the hospice will operate like all other public parking in the area on the basis of pay and display for short stays with fairly high tariffs, and for local residents with permits.

A section of the existing access road into the hospice is included in the Compulsory Purchase Order for the Proposed Scheme and this will become a public road for access to the proposed new public car park. There will be a public right of way extending into the hospice campus from Harold's Cross Road to a proposed new gate at the western end of the CPO Plot. Access control to the hospice campus will be relocated to a new gate at the end of the new public road section. The section of the access road to the new hospice gate will be under the control of Dublin City Council as the road authority.

On Harold's Cross Road the public footpath and cycle track will continue across the entrance to the hospice and the proposed new car park. Vehicles will mount over kerb ramps to cross the cycle track and footpath. This is in accordance with the standards in the *Design Manual for Urban Road and Streets (DMURS)* and will become the norm at priority-controlled side streets in future. Examples of this arrangement have been recently retrofitted on side streets along the *Clontarf to City Centre* street improvement scheme that is under construction by Dublin City Council.

Issue No.8: Parking at Mount Drummond Avenue

Issue Raised in DCC Submission

The DCC submission queries the new perpendicular parking spaces proposed on the eastern side of the Mount Drummond Avenue junction.

Response to Issue Raised in DCC Submission

The existing junction at Mount Drummond Avenue is excessively wide and longer than desirable for pedestrians to cross. In the Proposed Scheme, as shown in Figure 2-9-13, the junction will be narrowed and provided with a raised platform pedestrian crossing. This modification will make more space available for landscape planting in a location with limited street trees. It will also enable provision of 2 additional new parking spaces on the southern side of the junction in a location with a severe shortage of parking. Because of the wide space available it is possible to provide two perpendicular parking spaces rather than just one parallel space. These parking spaces are set well back from the main road at the junction and can operate just like a driveway in terms of vehicle manoeuvres off and onto the street. NTA is satisfied that this proposal will operate safely and satisfactorily and does not share the concerns of DCC. (See earlier response to Issue No.2).

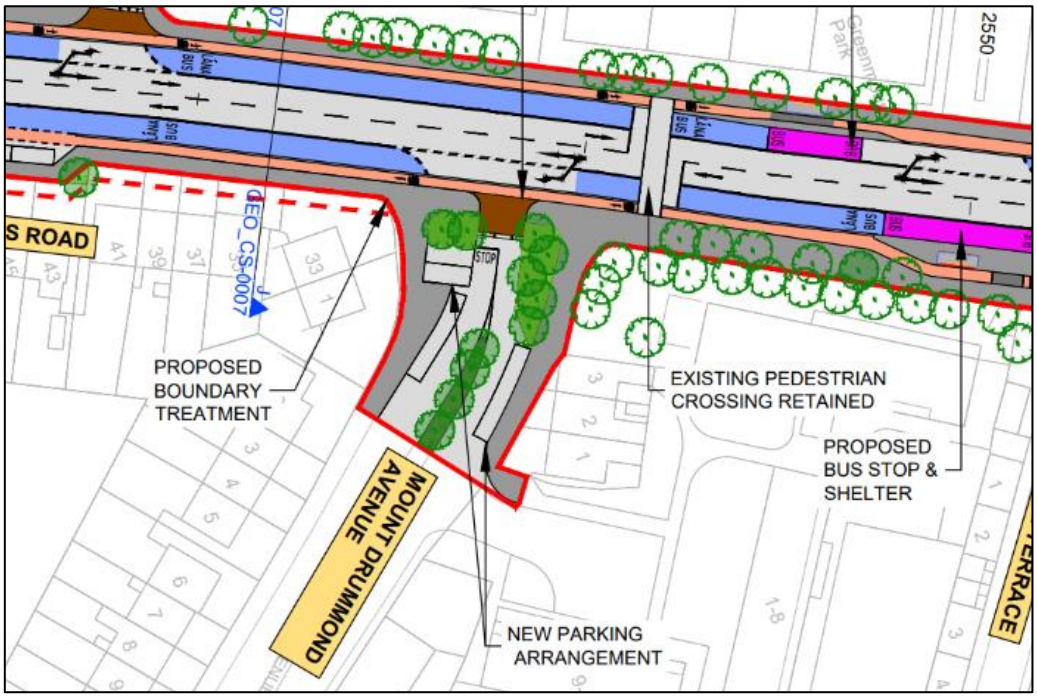


Figure 2-9-13: Extract from General Arrangement Sheet 7 at Mount Drummond Avenue

Issue No.9: Heritage Features in Cycle Tracks

Issue Raised in DCC Submission

Some heritage features are shown to obstruct the proposed cycle tracks in certain places.

Response to Issue Raised in DCC Submission

The heritage features in question are shown in their existing locations on the baseline mapping shown in the General Arrangement drawings. Where practicable these features will be relocated locally to a suitable location on the adjoining footpath.

Environmental Protection Division.

This section of the DCC submission identifies the following issues:

1) Water Quality impact
2) Various technical requirements for SUDS and drainage details.
3) Proposed trees over existing pipes.
4) Drainage for additional impermeable area near River Poddle at the Proposed Stone Boat Boardwalk.
5) Potential for additional bio-retention areas in some locations.
6) Drainage at proposed car park at Our Lady's Hospice.
7) Various technical queries.

Issue No.1: Water Quality

Issue Raised in DCC Submission

The DCC submission on page 20 says in relation to road surface water drainage to the River Poddle: "*The developer shall provide an evidence-based assessment of the impact, if any, of the Proposed Scheme on the water quality status of the rivers within the curtilage of the proposed project, including both ecological and chemical status*".

Response to Issue Raised in DCC Submission

There are some limited lengths of existing surface water sewers in the southern end of the Proposed Scheme along Kimmage Road Lower that drain to the River Poddle. In the Proposed Scheme there will be a minor reduction in the impermeable road area due to the introduction of a median island with trees along part of Kimmage Road Lower, which will slightly reduce the volume of road surface water that will drain to the River Poddle, and this will have a slight beneficial impact for water quality in that watercourse.

Issue No.2: SUDS and Drainage Details

Issue Raised in DCC Submission

The DCC submission lists various technical requirements for the drainage of the Proposed Scheme to be integrated into the wider city drainage system in accordance with the policies of Dublin City Council.

Response to Issue Raised in DCC Submission

The Proposed Scheme has been developed in line with the design principles as outlined by Dublin City Council as is described in EIAR Volume 2, Chapter 4 Scheme Description, Section 4.6.5, Chapter 13 Water, Section 13.4.1, and in the Preliminary Design Report Section 9 (Supplementary Information).

NTA will continue the very positive and constructive liaison with Dublin City Council in relation to drainage matters prior to the construction stage of the Proposed Scheme.

Issue No.3: Trees over Existing Pipes

Issue Raised in DCC Submission

The DCC submission notes the proposal to plant new trees along Kimmage Road Lower near Corrib Road and expresses a concern about underground drainage pipes at this location.

Response to Issue Raised in DCC Submission

The NTA is aware of the presence of the existing drainage pipes in the middle of Kimmage Road Lower at this location, which are quite deep below ground. The proposed new trees will be planted in tree pits within a new median island, which will contain the roots of the trees and prevent them from extending too far below ground to potentially interfere with the drainage pipes passing below.

Issue No.4: Drainage at the Stone Boat Boardwalk

Issue Raised in DCC Submission

The DCC submission asks how the drainage for the additional impermeable area at the Proposed Stone Boat Boardwalk will operate and if it will drain untreated into the River Poddle.

Response to Issue Raised in DCC Submission

The proposed boardwalk should not be classified as a new impermeable area as it will have an open grid deck that will allow rain to pass through directly to the river bank and river below. There is no pollution source with a pedestrian and cycle route, so the current runoff characteristics at this location will not change after the installation of the boardwalk.

Issue No.5: Bio-retention Areas

Issue Raised in DCC Submission

The DCC submission describes the potential for additional bio-retention areas in some locations.

Response to Issue Raised in DCC Submission

In so far as is practicable the Proposed Scheme has included some minor bio-retention areas, but the scope is very limited in an existing street where there will be very little change in the overall impermeable area.

Issue No.6: Drainage at proposed car park at Our Lady's Hospice

Issue Raised in DCC Submission

The DCC submission queries where the outfall is from the proposed car park at Ch.B10+448.

Response to Issue Raised in DCC Submission

The drainage drawing Sheet 7 (EIAR Volume 3, Figures, Chapter 4, Part 11) shows a surface water pipe in the access road to Our Lady's Hospice to be categorised as a proposed rather than an existing pipe in error. This pipe discharges to the nearby River Poddle culvert. The drainage from the proposed car park will be attenuated before discharging to this existing surface water pipe.

Issue No.7: Other Drainage Queries

Issue Raised in DCC Submission

The DCC submission lists a number of technical queries for the drainage of the Proposed Scheme.

Response to Issue Raised in DCC Submission

NTA will continue the very positive and constructive liaison with Dublin City Council in relation to drainage matters prior to the construction stage of the Proposed Scheme and will resolve these minor queries through that process.

Appendix 1 - Recommended Conditions

DCC has set out a number of suggested conditions that An Bord Pleanála should attach to a planning consent. NTA provides responses to each of the proposed conditions.

> ***"Proposed Condition 1:***
>
> *That a comprehensive agreement is put in place between DCC and the NTA regarding how the corridor is to be handed over to the NTA and its contractors, what pre-inspection and recording of the corridor is necessary and how the corridor is to be maintained during construction activities and by whom. The agreement shall also address the hand-back process, the treatment of all relevant records treated and how the corridor is to be accepted back by DCC following construction."*

NTA Response

Under the provisions of the relevant legislation, the NTA has exercised certain powers under Section 44(2)(b) of the 2008 Act to the effect that the functions in relation to securing the provision of public transport infrastructure falling within Section 44(2)(a) of the 2008 Act (as amended) in relation to the CBC Infrastructure Works, should be performed by the NTA. Those functions include the design and construction of the Proposed Scheme and, effectively, the NTA becomes the road authority in respect of the exercise of those functions.

Under the relevant legislation, upon the completion of the construction of the Proposed Scheme the NTA automatically ceases to be the road authority and the status of DCC as the relevant road authority is automatically restored – it does not require the operation of the conventional "taking-in-charge" arrangements provided for elsewhere in legislation. Accordingly, the legislative provisions appropriately govern the arrangements for the NTA to commence the construction of the Proposed Scheme, subject to the necessary planning and environmental consents, and govern the restoration of the road authority function to the relevant local authority, in this case being Dublin City Council.

Notwithstanding the above, the NTA intends to continue the close liaison with DCC that has been in place during the planning and design stage of the Proposed Scheme, during and throughout the subsequent construction stage. This will include engaging and collaborating on the construction arrangements, the road maintenance arrangements during construction and the standard to which the Proposed Scheme will be completed prior to transfer back to DCC, together with record retention, all in full accordance with the EIAR. Given the legislative framework that is in place, these are matters that can, and will, be successfully addressed between DCC and the NTA, in the absence of any approval condition.

> ***"Proposed Condition 2:***
>
> *Following hand-back, a separate agreement shall be put in place between DCC and the NTA regarding the costs of maintenance of the corridor as a high quality public transport corridor with agreed levels of performance and how the performance of the public transport corridor is not eroded in the future."*

This proposed condition seeks the enactment of an agreement between DCC and the NTA, subsequent to the completion of the construction of the Proposed Scheme, addressing issues related to maintenance costs.

The Proposed Scheme upon its completion reverts to the status of a public road under the management of the relevant local authority, in this case Dublin City Council. The funding of costs associated with the maintenance of public roads can involve a number of parties depending on the status of the road – for instance, in the case of a national road Transport Infrastructure Ireland would have an involvement. As the Proposed Scheme does not encompass any section of national road, its components constitute regional and/or local roads only. Funding of regional and local roads fall under the ambit of the relevant local authority and the Department of Transport.

The Exchequer does not currently provide the NTA with funds for dispersal to local authorities for maintenance activities and the NTA does not have a role in overseeing or organising general public road maintenance activities. However, the NTA does retain responsibility for bus fleet, bus stops and bus shelters, and maintenance of these elements falls within its remit.

The NTA agrees with the objective stated in the draft condition, namely, to ensure "maintenance of the corridor as a high-quality public transport corridor with agreed levels of performance". To achieve that objective, the NTA anticipates continuing its collaboration with DCC to ensure the delivery of an appropriate maintenance regime. As part of this collaboration, the NTA will support the provision of the necessary funding by the relevant parties to ensure that the benefits of the Proposed Scheme are not inappropriately eroded. These are matters that can be successfully addressed between DCC and the NTA, in the absence of any approval condition.

> ***"Proposed Condition 3:***
>
> *All relevant DCC departments involved with the development of the Scheme shall be consulted during the detailed design development process for the Scheme and the NTA shall seek, to the extent practicable, to incorporate the requirements of the DCC departments into the final detailed design of the Scheme."*

The NTA acknowledges the close liaison with DCC that has been in place during the planning and design stage of the Proposed Scheme, which included extensive dialogue with the relevant sections within the Council. The Proposed Scheme as submitted to An Bord Pleanála has properly considered, and taken into account, the inputs from those sections during the design development process.

It is the intention of the NTA that this collaboration will continue both in advance of, and during, the subsequent construction stage of the Proposed Scheme. This will include continued liaison with the relevant sections of the Council and taking their requirements into consideration, where aligned with and consistent with the EIAR. These are matters that can be successfully addressed between DCC and the NTA, in the absence of any approval condition.

Departmental Suggested Conditions

City Archaeologist Conditions

The NTA notes the recommendation for the appointment of a Project Archaeologist.

In the EIAR for the Proposed Scheme provision is included to appoint a Project Archaeologist during the construction stage.

In Section 15.5.1.1 in Chapter 15 (Archaeological and Cultural Heritage) it states that:

> *"The NTA will procure the services of a suitably-qualified archaeologist as part of its Employer's Representative team administering and monitoring the works. The appointed contractor will make provision for archaeological monitoring to be carried out under licence to the DHLGH and the NMI, and will ensure the full recognition of, and the proper excavation and recording of, all archaeological soils, features, finds and deposits which may be disturbed below the ground surface."*

Section 15.5.1.1.1 addresses archaeological management.

> *"An experienced and competent licence-eligible archaeologist will be employed by the appointed contractor to advise on archaeological and cultural heritage matters during construction, to communicate all findings in a timely manner to the NTA and statutory authorities, to acquire any licenses/ consents required to conduct the work, and to supervise and direct the archaeological measures associated with the Proposed Scheme.*
>
> *Licence applications are made by the licence-eligible archaeologist on behalf of the client to the National Monuments Service at the DHLGH. In addition to a detailed method statement, the applications must include a letter from the client on client letterhead that confirms the availability of adequate funding. There is a prescribed format for the letter that must be followed. Other consents may include a Detection Device licence to use a metal detector or to carry out a non-invasive geophysical survey.*
>
> *A construction schedule will be made available to the archaeologist, with information on where and when the various elements and ground disturbance will take place. As part of the licensing requirements, it is essential for the client to provide sufficient notice to the archaeologist/s in advance of the construction works commencing. This will allow for prompt arrival on site to undertake additional surveys and to monitor ground disturbances. As often happens, there may be*

down time where no excavation work is taking place during the Construction Phase. In this case, it will be necessary to inform the archaeologist/s as to when ground breaking works will recommence.

In the event of archaeological features or material being uncovered during the Construction Phase, all machine work will cease in the immediate area to allow the archaeologist/s time to inspect and record any such material.

Once the presence of archaeologically significant material is established, full archaeological recording of such material is recommended. If it is not possible for the construction works to avoid the material, full excavation will be recommended. The extent and duration of excavation will be advised by the client's archaeologist and will be a matter for discussion between the client and the licensing authorities.

Secure storage for artefacts recovered during the course of the monitoring and related work will be provided.

As part of the licensing requirement and in accordance with the funding letter, adequate funds to cover excavation, post-excavation analysis, and any testing or conservation work required will be made available…"

The City Archaeologist requests that there is publication and/or dissemination as appropriate of the archaeological results of the project and that the Archaeology Section is copied with all Section 26 method statements and any reports arising and provide regular updates on finds and mitigation.

The City Archaeologist also recommends that the primary archaeological paper archive for all archaeological site investigations be prepared and deposited with the Dublin City Archaeological Archives within a timeframe to be agreed with the planning authority. The NTA will liaise with DCC in regard to archival processes.

The City Archaeologist requests revised design proposals for the *Stone Boat Boardwalk* to enhance the setting and interpretation of the monument. NTA is satisfied that the proposed design will provide excellent visibility of the monument through the perforated bridge deck, and there will be information boards provided to assist with interpretation of the monument. It is not proposed to modify the proposed design, but NTA will liaise further with the City Archaeologist in developing the information to be displayed at the site.

The City Archaeologist requests revised design proposals for the proposed footbridges and retaining walls at Robert Emmet Bridge and along Clanbrassil Street Upper. NTA is satisfied that the Proposed Scheme design has been carefully developed to maximise the retention of historic features in so far as is practicable in the proposed widening works. The proposed footbridges are lightweight and low-key so as to maximise visibility of Robert Emmett Bridge and will be sensitively integrated with the existing bridge supports and adjoining abutments and walls. An information board will be provided on the eastern footbridge to replicate the Robert Emmet Memorial which will no longer be directly visible for pedestrians. Heritage materials will be salvaged and reused in the new retaining wall.

Parks, Biodiversity and Landscape Services Conditions

The NTA notes the general comments on the Proposed Scheme in the recommendations in the Appendix. NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Parks, Biodiversity and Landscape Services comments as these matters were the subject of extensive liaison throughout the design development process.

A Tree Bond would not be appropriate for the Proposed Scheme, especially as the DCC submission has noted that there are no mature historic trees that would be affected by the Proposed Scheme.

City Architect's Department Conditions

The NTA notes the general comments on the Proposed Scheme in the recommendations in the Appendix. NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC City Architect's Department comments as these matters were the subject of extensive liaison throughout the design development process.

Air and Noise Pollution Control Unit Conditions

Chapter 7 (Air Quality) and Chapter 9 (Noise and Vibration) in Volume 2 of the EIAR, both contain an assessment of the potential air and noise impacts which could arise from the construction of the Proposed Scheme (the construction strategy is set out in Chapter 5 in Volume 2 of the EIAR). Chapters 7 and 9 also contain comprehensive suite of measures to mitigate the potential air and noise impacts which could arise from the construction of the Proposed Scheme. These mitigation measures broadly align with the 'good practice' measures set out in the DCC Air Quality Monitoring and Noise Control Unit's Good Practice Guide for Construction and Demolition. These mitigation measures are also contained within the Construction Environmental Management Plan in Appendix A5.1 in Volume 4 of the EIAR.

Conservation Section Conditions

The NTA notes the general comments on the Proposed Scheme in the recommendations in the Appendix. NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Conservation Section comments as these matters were the subject of extensive liaison throughout the design development process.

The proposed approach to safeguarding architectural interest of affected Architectural Heritage across the Proposed Scheme is covered in section 16.5 in Chapter 16 in Volume 2 of the EIAR.

Best conservation practice, specifications, and method statements for the careful and sensitive relocation and reinstatement of historic fabric is addressed in section 16.5 in Chapter 16 in Volume 2 of the EIAR.

The proposed engagement of an architectural heritage specialist and the duties is addressed in section 16.5 in Chapter 16 in Volume 2 of the EIAR.

The NTA will continue to engage with the relevant local authority departments in accordance with the relevant guidelines, policy and legislation outlined in Section 16.2.4 of Chapter 16 in Volume 2 of the EIAR.

Best conservation practice and the Architectural Heritage Protection Guidelines for Planning Authorities (2011) and the Advice Series issued by the Department of Housing, Local Government and Heritage are referenced in 16.2.4 Chapter 16 in Volume 2 of the EIAR. The proposed protection measures for all existing original architectural heritage features in the vicinity of the works are outlined in section 16.5 of Chapter 16 in Volume 2 of the EIAR. The requirements of the appointed contractor relating to the Architectural Heritage is outlined in section 16.5 of Chapter 16 in Volume 2 of the EIAR.

With respect to the specific measures recommended by the Conservation Section:

- Redesigned scheme at Robert Emmet Bridge;
- Concealment/Burial of historic walls at Clanbrassil Street;
- Redesign of the scheme at Clanbrassil Street Upper.

Section 16.5.1.2 in Chapter 16 in Volume 2 of the EIAR sets out the mitigation which will implemented with regard to the Robert Emmet Bridge and the historic walls at Clanbrassil Street and acknowledges the residual impacts. Refer to the NTA response provided in Section 4.11 of this document which sets out why redesign is not considered appropriate.

The Conservation Section says that bus shelters should be omitted in front of and in the immediate vicinity of Protected Structures. The issue of bus shelter design has been addressed earlier in the response to the DCC submission.

The Conservation Section says that consideration should be considered to the rationalisation of traffic infrastructure such as signage across the route to reduce visual clutter. The NTA notes this comment. Significant efforts have been made during the design process to minimise above-ground utility infrastructure where practicable. Where such infrastructure is necessary, it has been sited in appropriate locations, and rationalised where practicable.

The Conservation Section says that consideration should be given to providing alternative high quality cycle lane surfaces in lieu of red tarmacadam, where cycle ways are located in proximity to protected structures and within ACAs. The NTA notes this comment. Section 5.5 of the BusConnects Preliminary

Design Guidance Booklet, included EIAR Appendix A4.1 in Volume 4 Part 1 of 2 states the following in relation to the proposed cycle track material:

> *"As illustrated in Figure 8, the use of machine laid asphalt for the cycle track has proven to be an effective way of providing a high level of service with a safe, smooth and continuous surface. This, however, offers very little contrast to the adjacent carriageway, and depends on the type of edge kerb and the presence of road markings to offer a visual differentiation between the carriageway and the cycle track. Consideration should be given to including an additional colour contrast to the cycle track in the form of an alternative-coloured asphalt (e.g. red, buff, etc) or adding coloured chips to the asphalt surface during installation (e.g. red chip). Designers should refer to section 5.6 of the NCM for further guidance on appropriate cycle track materials. At junctions, the chosen cycle track material should be continued (as a surface course layer) through the junction for consistency. Alternatively, coloured epoxy resin (cold-applied anti-skid layer) is a robust alternative measure in terms of longevity and maintenance for making cycle lanes more conspicuous at junctions."*

In summary, the use of red coloured asphalt, or red coloured epoxy resin has been specified for all cycle tracks across the BusConnects Infrastructure Works to ensure legibility and conspicuity of the proposed cycle tracks and to ensure safety for vulnerable road users.

Environmental & Transportation Department

Traffic Division

The NTA will continue to liaise with the Traffic Division of Dublin City Council to ensure that all new traffic signal equipment is suitable for integration into the existing city traffic signal control system and to make suitable arrangements for the modification of existing equipment and installation of new equipment.

Roads Division Conditions

The proposed conditions extend over Pages 60 to 62 of the DCC Submission and covers numerous items including existing conditions records, design, reinstatement, construction period and miscellaneous matters.

Response: In regard to the suggested Conditions the NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Roads Division inputs as these matters were the subject of extensive liaison throughout the design development process. The NTA will continue to liaise with the Roads Division of Dublin City Council during the works for the Proposed Scheme and subsequent handover to the City Council.

Public Lighting Conditions

The Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Public Lighting Department inputs regarding the required light level design and the relevant EN certification as these matters were the subject of extensive liaison throughout the design development process. The NTA will continue to liaise with the Public Lighting Section of Dublin City Council during the works for the Proposed Scheme and subsequent handover to the City Council.

Environmental Protection Division Conditions

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

2.10 Dublin Commuter Coalition

Summary of issue raised:

1) Support for Proposed Scheme
2) Enforcement of bus lanes, bus gates, turn bans, etc.
3) Bus lanes and bus gates operational hours should be 24/7.
4) Provisions for cyclists at junctions do not fully comply with the Cycle Design Manual with insufficient segregation for cyclists at Ravensdale, Mount Argus View and Harold's Cross Road / Kimmage Road Lower.
5) Bus stop islands too narrow in several places with cycle track between shelter and road.
6) Missing pedestrian crossings at some junctions, e.g.: Harold's Cross Road / Park View.
7) Cycle parking insufficient.
8) No segregation for cycle tracks in several places.

Responses to issues raised:

1. Support for Proposed Scheme

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

2. Enforcement of bus lanes, bus gates, turn bans, etc.

The NTA acknowledges the comments raised in relation to camera enforcement. Whilst enforcement for the lawful use of bus lanes is currently a matter for An Garda Síochána, the NTA is separately exploring proposals and methods for bus lane enforcement as set out under Measure INT24 – Enforcement of Road Traffic Laws of the Greater Dublin Area Transport Strategy 2022-2042.

With the State having incurred the very large expenditure required to deliver the BusConnects Programme, it is vital to ensure that sufficient enforcement is in place such that the benefits of that investment are not eroded by widespread breaches of the restrictions applying to bus lanes, cycle tracks and junctions. To effectively ensure this outcome, camera-based enforcement will be required to augment the on-street activities of An Garda Siochana.

This type of arrangement is in place in many jurisdictions internationally, where camera detection of certain breaches of regulations is linked to the automatic issue of fixed penalty notices.

Action 67 in the Road Safety Strategy Phase 1 Action Plan 2021–2024 sets out the need to "further develop camera-based enforcement by the Gardaí, including at junctions and for management of bus/cycle lanes, building on existing and recent legislation through establishing suitable cross-agency administrative arrangements; and, where any legislative issues are identified, to consider and develop agreed proposals to remedy them."

The Department of Transport has requested the National Transport Authority (NTA) to undertake the first phase of this action, namely, to establish and chair a working group to explore this action and to bring forward recommendations on how it should be progressed. The subsequent steps for implementation, including addressing any legislative issues that may be identified, will be determined by the Department of Transport subsequent to the initial phase. It is expected that the report of the Working Group will be finalised and provided to the Department later this year.

Notwithstanding this, specific measures have been considered in the development of the Proposed Scheme that will help deter inappropriate and unlawful use of bus lanes including advanced bus signal detection systems which will activate green signals at traffic lights for authorised vehicles only.

3. Bus lanes and bus gates operational hours should be 24/7.

The proposed bus gates operational times is shown in the tables below:

Bus Gate No.	Location	Direction	Operational Times
1	Kimmage Road Lower Just north of the Ravensdale Park junction	Northbound	6am to 10am & 4pm to 8pm / 7 Days
		Southbound	6am to 10am & 4pm to 8pm / 7 Days
2	Kimmage Road Lower Just south of Harold's Cross Park	Northbound	24 Hours / 7 Days
		Southbound	24 Hours / 7 Days
3	Kimmage Road Lower Junction with Harold's Cross Road	Northbound	6am to 10am / 7 days
		Southbound	24 Hours / 7 Days
4	Kenilworth Park westbound at junction with Harold's Cross Road	Westbound	24 Hours / 7 Days

The Proposed Scheme is somewhat unusual in that there will be 3 bus gates along Kimmage Road Lower that will operate in combination with each other. The principal Bus Gate No.2 just south of Harold's Cross Park will provide the main control of general traffic to provide bus priority and low-flow traffic conditions for cyclists to share the road with a small amount of local traffic over a 2km length of the route. This bus gate will operate on a full-time basis, along with Bus Gate No.3 in the southbound direction. In this context, and to enable appropriate access for local traffic it is proposed that Bus Gate No.1 will operate during peak hours only. This will provide a balance between the desirable bus priority and the degree of traffic displacement onto other local roads. Similarly, Bus Gate No.3 will operate during peak hours only in the northbound direction so as to accommodate funeral traffic leaving from Mount Jerome Cemetery and to spread that traffic more evenly on the streets surrounding Harold's Cross Park.

All bus lanes in the Proposed Scheme will operate on a 24 hour and 7-day basis.

4. Provisions for cyclists at junctions

The submission states that *"the junction design in the Proposed Scheme does not follow international best practice".*

i. Principles of Protected Junction Design for BusConnects

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

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

> *"Enhance the potential for cycling by providing safe infrastructure for cycling, segregated from general traffic wherever practicable."*

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

existing documents and standards such as the National Cycle Manual and DMURS. The PDGB was developed to outline the agreed design principles and to enable consistency of design.

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

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

The typical protected junction layout, as shown in Figure 2.6.10, offers significant safety improvements compared to the traditional junction layout. The deflection of the cycle track at the junction allows the protection kerb (Note 4) to be positioned on the corner of the junction. In urban locations subject to spatial constraints, the protection kerb provides a tighter turning radius for vehicles and will force the left-turning motorist to reduce speed before making the tighter turn. This design layout also keeps straight-ahead and right-turning cyclists on the raised-adjacent cycle track as far as the junction, avoiding any cyclist-vehicle conflict at weaving and merging lanes, for example, where access to a dedicated left-turn lane would previously have necessitated a vehicle to cross the cycle lane. Right-turning cyclists will navigate the cycle lane on the junction and turn right (in a controlled manner) after it crosses the side arm. Other benefits to this junction design include:

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

b) Raised and protected cycle track approaching junction;

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

d) Improved right-turning safety; and

e) Improved sight lines for left turning traffic.

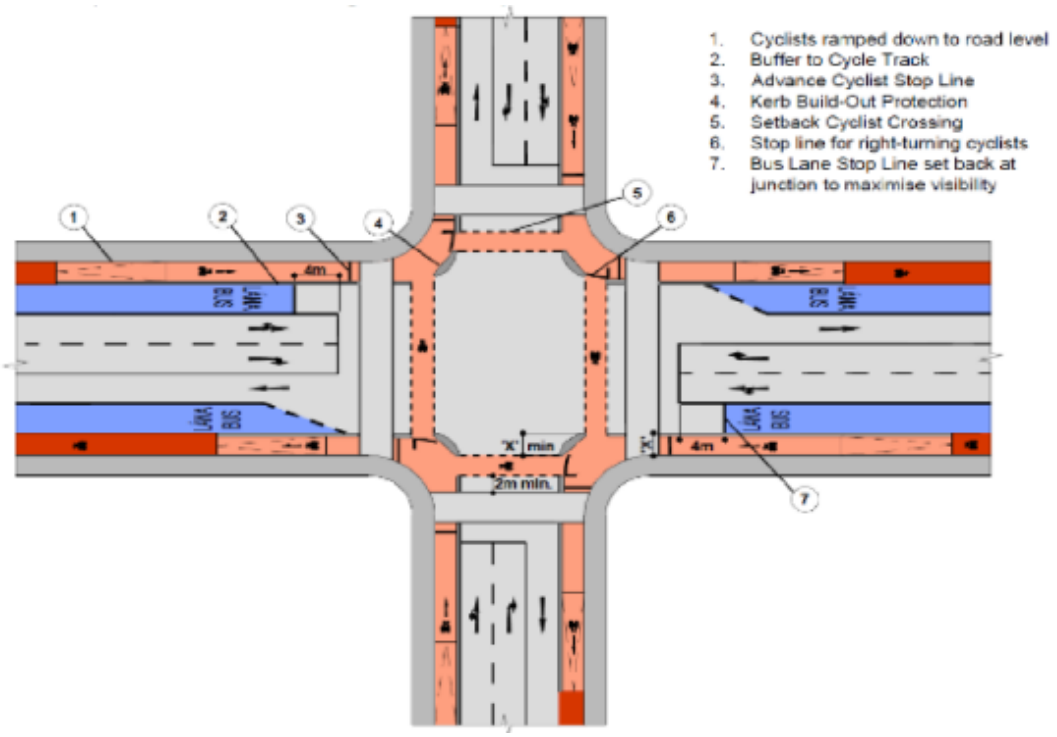


Figure 2.4.1 Typical Junction layout from BusConnects Design Guidance Booklet

ii. Pedestrian-cyclist conflict

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

Consideration for all of these elements has led to the development of the four junction types described in the PDGB.

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

Similarly, the layout of the 'Dutch style' junctions described in the submission can result in a reduced level of service for pedestrians. The layout of these junctions requires a multi-movement, sometimes multi-directional, non-continuous crossings for pedestrians required with at least 3 crossing movements (2 x cycle track crossing, 1x carriageway) to cross a side road of a typical junction. The intermediate landing area for pedestrians between the cycle track and carriageway requires a suitably sized holding area for pedestrians to wait before crossing the road, this can require a significant space for urban locations.

Junction types 1-3 in the PDGB aim to consolidate and segregate/confine this waiting area to within the footpath, thus creating a more legible and functional use of the available space for all users with direct crossing facilities that align to the principles of DMURS.

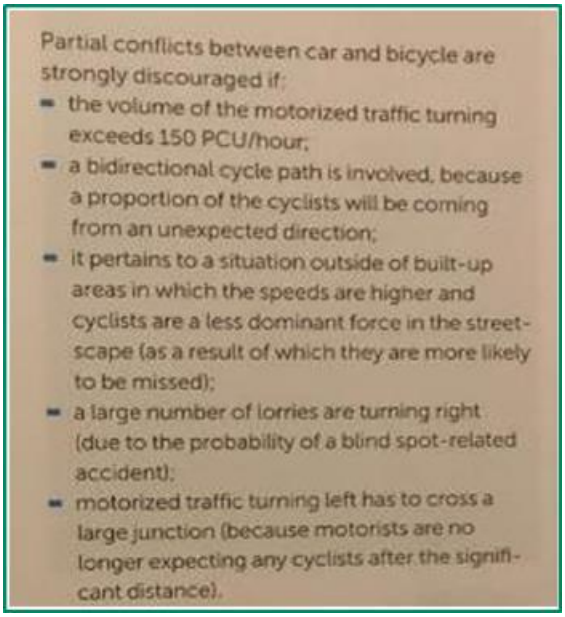
It is for these reasons that the layout of the 'Dutch style' junctions described in the submission have not been adopted for junctions on the Proposed Scheme.

iii. Use of traffic signals to yield to cyclists

The concept of allowing both cyclists and general traffic to proceed together in the same direction is not uncommon and the same traffic signals arrangement also caters for left-turning traffic. In the Netherlands, there are scenarios where the equivalent right-turn movement can be green whilst cyclists are also green. There is, however, an additional requirement to yield to cyclists in this Dutch scenario, see Figure 2.4.2.

Figure 2.4.2 Example from the Netherlands of traffic signals + give way signage controlling turning traffic and cyclists (Source: Dutch Design Guide Ontwerpwijzer Fietsverkeer)

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


Partial conflicts between car and bicycle are strongly discouraged if:

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

Figure 2.4.3 Extract from Dutch Design Guide Ontwerpwijzer Fietsverkeer

Dutch authorities have a suite of solutions for different scenarios – no one solution works everywhere. For junctions to operate safely and effectively, it is critical that the control of all movements is considered. All road users can have their own traffic signals at junctions (pedestrians, cyclists, buses, vehicles). To achieve optimum operational efficiency including the efficient movement of cyclists, it is also possible for some movements to occur safely at the same time. To assist with these design decisions, thresholds for turning movements have been used. Chapter 6 (Page 153) of the Dutch Design Guide Ontwerpwijzer Fietsverkeer discourages partial conflicts between cyclists and vehicles if the volume of turning vehicular traffic exceeds 150 PCUs per hour. See the above extract from Ontwerpwijzer Fietsverkeer which identifies the above threshold in Figure 2.6.12.

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

19 of the 32 key junctions on the Proposed Scheme have implemented this approach to achieve optimum operational effectiveness including the efficient movement of cyclists. Introducing separate signal phases will increase delay for cyclists at junctions. This arrangement will promote the sustainable mode hierarchy for cyclists at junctions by providing priority to ahead cyclists over left turning vehicles.

At each of these junctions the left turning vehicle traffic volumes in these locations are estimated to be less than the 150PCU threshold and similarly low HGV volumes are estimated in line with the principles established by international guidance. In addition to specific signage such as that presented in Figure 39 and Figure 40 of the PDGB, at each of the 19 locations a three to five second early start for cyclists is typically provided to further mitigate the potential for the number of interactions with vehicles/cyclists at these locations. The Proposed Scheme has also been subject to Road Safety Audits at different stages that have informed the design development of the Proposed Scheme.

13 of the 32 key junctions on the Proposed Scheme have implemented junctions where cyclists have a separate signal phase to vehicles.

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

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

It is noted that the Cycle Design Manual was published in 2023 and replaced the previous National Cycle Manual, published by the NTA in 2011. This document includes provision for us of flashing amber for left turning vehicles as presented in TL503.

Three Particular Junctions

The submission states that the provisions for cyclists at three particular junctions do not fully comply with the Cycle Design Manual with insufficient segregation for cyclists at Ravensdale, Mount Argus View and Harold's Cross Road / Kimmage Road Lower. The Proposed Scheme design at these three junctions is shown in Figures 2-10-1, 2-10-2 and 2-10-3, followed by a discussion about the provisions for cyclists.

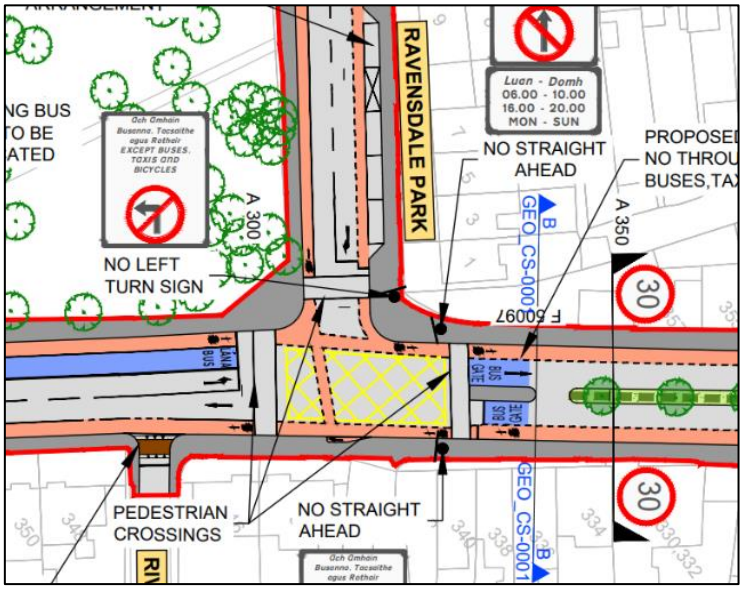
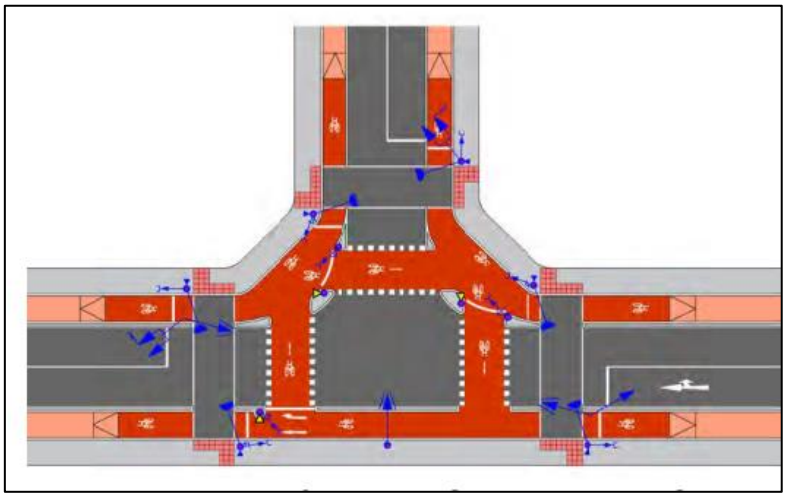


Figure 2-10-1: Junction of Kimmage Road Lower and Ravensdale Park

The junction at Ravensdale Park is unusual in that it is located at proposed Bus Gate No.1 just to the north. Northbound cyclists and buses will be separated from general traffic in the signal staging and will not move concurrently. General traffic will be required to turn left at this junction when the bus gate is operational. Buses and cyclists will move in the preceding signal stage while general traffic is held. There is no requirement therefore to provide a protective traffic island on the southwest corner of this junction for separation of left-turn traffic from cyclists. Such an arrangement is not covered by the generic junction layouts shown in the *Cycle Design Manual*, but the junction design is compliant with the general principles of the design manual.

Figure 2-10-2: Junction of Kimmage Road Lower and Mount Argus View

The most suitable potential design layout for such a junction is indicated in the *Cycle Design Manual* Figure 4.90 shown below.



Cycle Design Manual Figure 4.90: Typical layout of a Protected T-Junction in a constrained location

Figure 4.90 shows an arrangement at a tee-junction where there are segregated cycle tracks on both the main road and side road, which is not the case at the Mount Argus Vie junction on Kimmage Road Lower. In the Proposed Scheme the provision of bus gates on Kimmage Road Lower will remove through traffic and greatly reduce the volume of traffic along the road to a very low flow for local access only. In addition, a 30 km/h speed limit will apply. The context for cycling in these low-flow and slow conditions will be appropriate for shared use of the road without need for segregated cycling facilities. In this context the Proposed Scheme will exceed the requirements of the *Cycle Design Manual* in that separation islands are proposed at the junction with Mount Argus View, despite the benign traffic conditions. In the southbound direction a separator island will provide a protected facility for right-turning cyclists to access Mount Argus View and to continue on the parallel *Poddle Way* cycle route to Sundrive Road via the *Stone Boat Boardwalk.*

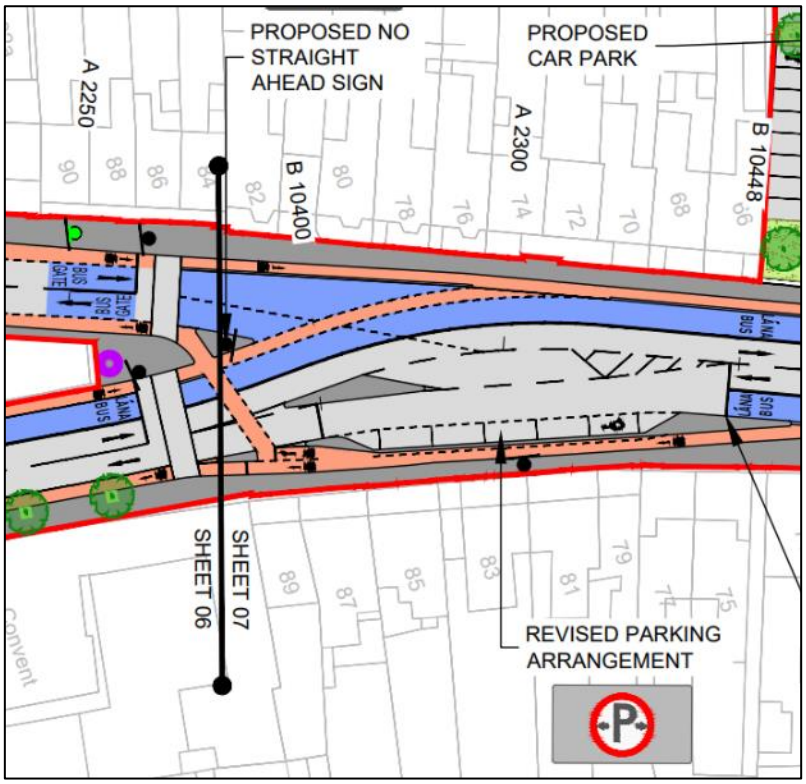


Figure 2-10-3: Junction of Kimmage Road Lower and Harold's Cross Road

The proposed design as shown in Figure 2-10-3 is similar to the example in Figure 4.92 of the *Cycle Design Manual* (below).

Figure 4.92: A diagonal cycle crossing with separate cycle phase near Heuston Station, Dublin.

The discussion above has demonstrated that the design in the Proposed Scheme at the three junctions referred to in the submission by the *Dublin Commuter Coalition* meet or exceed the requirements of the *Cycle Design Manual*.

5. <u>Bus stop islands too narrow in several places with cycle track between shelter and road.</u>

The NTA welcomes Dublin Commuter Coalition's comments in relation to the importance of considering the pedestrian/cyclist interaction at bus stops. Section 11 of the Preliminary Design Guidance Booklet (PDGB) within Chapter 4 Proposed Scheme Description Appendix A4.1 of Volume 4 of the EIAR sets out the key measures to address the concerns raised in relation to vulnerable users at these locations

which is further elaborated in Section 4.14 of the Preliminary Design Report in the Supplementary Information. These details have evolved as a result of direct consultation between the NTA and representative mobility groups, accessibility audits and road safety audits which have been carried out during the development of the Proposed Scheme.

As described in PDGB Section 11.1 Island Bus Stop, these types are the preferred bus stop option to be used as standard on the BusConnects Infrastructure Works where space constraints allow. Island bus stops reduce the potential for conflict between pedestrians, cyclists and stopping buses by deflecting cyclists behind the bus stop, thus creating an island area for boarding and alighting passengers. On approach to the bus stop island the cycle track is intentionally narrowed, with yellow bar markings also used to promote a low-speed single file cycling arrangement on approach to the bus stop. Similarly, a horizontal cycle track deflection is proposed on the approach to the island to reduce cyclists' speed on approach to the controlled pedestrian crossing point on the island. To address the potential pedestrian/cyclist conflict, a pedestrian priority crossing point is provided for pedestrians accessing the bus stop island area.

Where space constraints do not allow for an island bus stop, PDGB Section 11.2 Shared Bus Stop Landing Zone provides an option consisting of a shared bus stop landing zone that may be considered. This proposed arrangement will remove the conflict between cyclists and stopping buses by ramping cyclists up to the footpath level where they continue through the stop.

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

6. Missing pedestrian crossings at some junctions

The submission lists three junctions where pedestrian crossings are not proposed across all arms. These are at:

- Kimmage Road Lower / Mount Argus View (shown previously in Figure 2-10-2)
- Kimmage Road Lower / Harold's Cross Road (shown previously in Figure 2-10-3)
- Harold's Cross Road / Park View Avenue (shown in Figure 2-10-4)

The existing junction layout at Kimmage Road Lower / Mount Argus View has traffic signals with one pedestrian crossing on the northern arm, and uncontrolled crossings on the other arms. In the Proposed Scheme, Kimmage Road Lower in this section will carry much reduced traffic and will operate at a low-speed limit of 30 km/h. In this context traffic signals are not actually necessary at this junction as pedestrians will be able to cross the road safely wherever they wish along the road. However, so as to facilitate the joining of the *Poddle Way* walking and cycling route with Kimmage Road Lower at this location, the signals will be retained and the junction modified to a more compact layout with the existing left-slip lanes and traffic islands removed, as shown in Figure 2-10-2. The pedestrian crossing of Kimmage Road Lower will be relocated to the southern arm and it will operate in tandem with a right-turn signal for southbound cyclists to cross the road into Mount Argus View and to continue on the parallel *Poddle Way* cycle route to Sundrive Road via the *Stone Boat Boardwalk*. Thus pedestrians and cyclists can cross the road at the same time without conflict, which would not be possible if the existing pedestrian crossing were retained on the northern side. A pedestrian signal crossing will be provided on the western arm at Mount Argus View as well. The Proposed Scheme will provide a significant improvement at this junction for both pedestrians and cyclists and a third pedestrian crossing is not necessary.

The existing junction layout at Kimmage Road Lower / Harold's Cross Road has traffic signals with two pedestrian crossings on the southern arms of the Y-junction. This arrangement is retained in the Proposed Scheme. As may be seen in Figure 2-10-3, there is a fairly complex arrangement proposed on the northern arm of the junction with an advance signal for buses to cross from the bus lane on the left side of the southbound traffic lane, and to pass through the proposed bus gate at the start of Kimmage Road Lower. A separate signal crossing is proposed for cyclists to make the same movement

forward of the bus signal. These bus and cycle signals will operate in tandem with the pedestrian crossing signal on Harold's Cross Road, as part of an efficient arrangement that will operate on a short signal cycle which will minimise delay for buses, cyclists, and pedestrians. If an additional pedestrian crossing were provided on the northern arm, it would be very long as the road is 24m wide at that location, and this would considerably exceed the desirable maximum crossing length of 19m as defined in Section 5 of the Preliminary Design Guidance Booklet for BusConnects Core Bus Corridors (Supplementary Information, Preliminary Design Report, Appendix O (Kimmage-CBC-PDR-Appendix-O-BCPDG.pdf (kimmagescheme.ie)). To shorten the crossing to less than 19m, it would need to be located where the advance bus signal is proposed between No.66 and 75 Harold's Cross Road on opposite sides. A pedestrian crossing at this location could only operate with all traffic and bus movements stopped, and this would extend the signal cycle time leading to more delay for all road users. It is preferable therefore not to provide an additional pedestrian crossing on the northern side of this junction.

The existing junction of Kimmage Road Lower and Park View Avenue is priority-controlled with a pedestrian signal crossing on the southern arm on Harold's Cross Road. In the Proposed Scheme this junction will be fully signal-controlled with a new southbound right-turn lane that will accommodate traffic towards Mount Jerome Cemetery, Mount Argus Road, and the western side of Harold's Cross Park, as this traffic will be diverted away from Bus Gate No.3 at the northern end of the park. This right-turn can operate at the same time as the pedestrian crossing on the southern arm of the junction, which will be advantageous for the operation of the junction. There is no existing footpath on the western side of Harold's Cross Road along the side of the park, and the main desire line for pedestrians is to cross Harold's Cross Road at the southern side of the junction at Park View Avenue. It is preferable therefore not to provide an additional pedestrian crossing on the northern side of this junction.

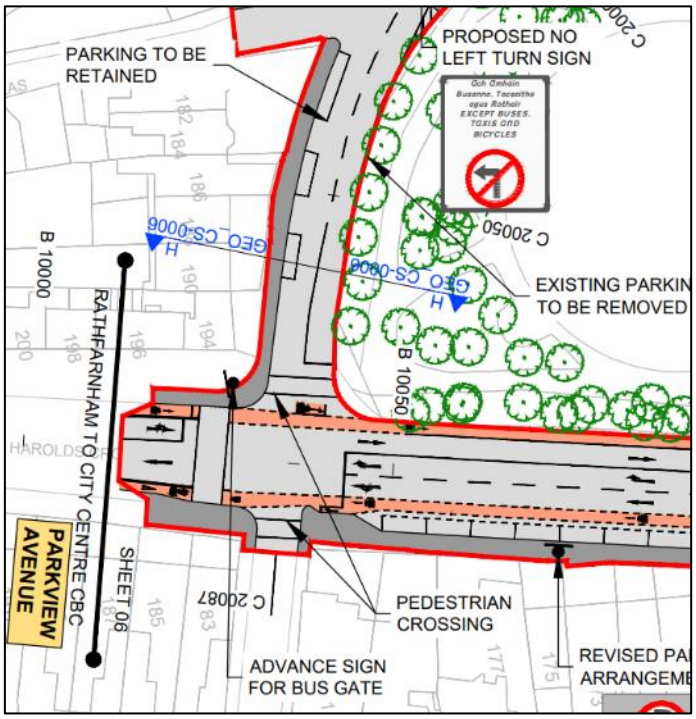


Figure 2-10-4: Junction of Kimmage Road Lower and Park View Avenue

7. Cycle parking insufficient

There is a reasonable existing provision of cycle parking along this Core Bus Corridor at locations of demand at shops and various facilities, and these are described in EIAR Volume 2, Chapter 6 Traffic and Transport in Sections 6.3.2.2, 6.3.3.2 and 6.3.4.2, amounting to over 90 parking stands with capacity for 180 bikes.

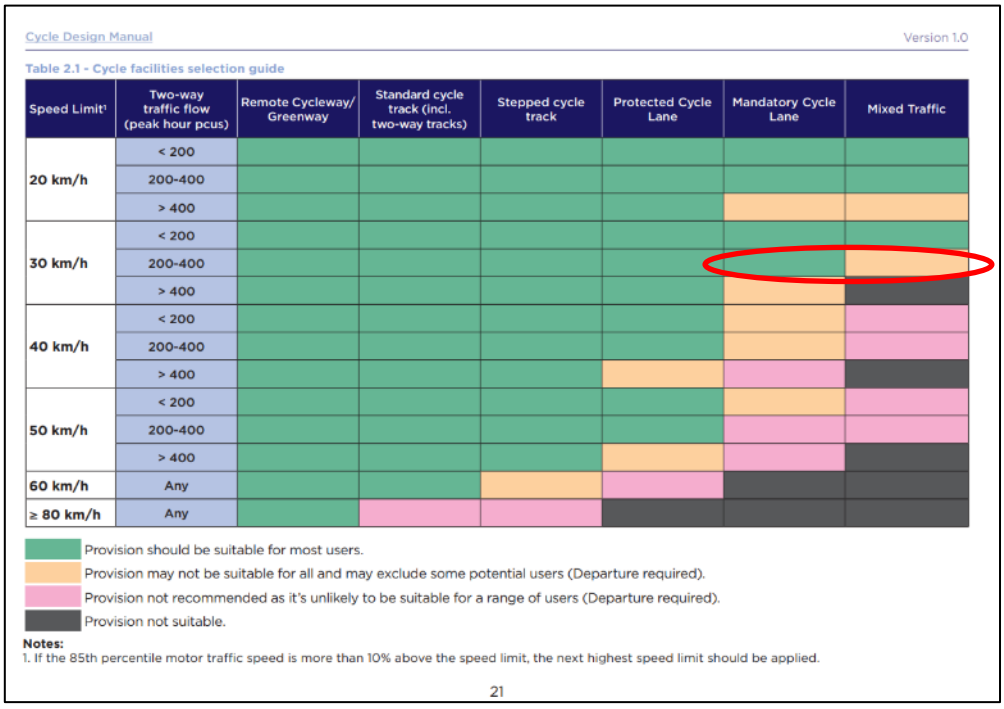
In the Proposed Scheme additional cycle parking will be provided at each bus stop where practicable. In EIAR Volume 2, Chapter 4 Description of the Proposed Scheme, the typical island bus stop arrangement is shown in Figure 4.6 where 7 cycle parking stands will be provided with capacity for 14 bikes. In the Supplementary Information, Preliminary Design Report, Section 4.13 describes the bus

stops in the Proposed Scheme, of which 12 will be island types where 7 cycle parking stands will be provided, amounting to 84 stands. In combination with the existing 90 cycle parking stands that will almost double the amount of cycle parking along the core bus corridor. Further cycle parking will be provided where practicable at the other 11 in-line bus stops, subject to the spatial constraints at narrow footpaths and adjoining entrances. It may be seen therefore that a significant increase in cycle parking will be provided along the Proposed Scheme which should be sufficient to cater for demand.

8. No segregation for cycle tracks in several places.

In the response to Item 4 earlier it has been explained that the traffic environment along Kimmage Road Lower will be transformed by the proposed bus gates into a "Low-Flow & Slow" context where cyclists can safely and comfortably share the road with a low volume of local access traffic. In the *Cycle Design Manual,* Table 2.1 (shown following) defines the required cycling facility according to the volume and speed of motorised traffic. This indicates that a "mixed traffic" environment is suitable for a traffic speed of 20 km/h and up to 400 PCU/hour, or 30 km/h and up to 200 PCU/hour, or a mandatory cycle lane at 30 km/h and over 400 PCU/hour. Cycle tracks or protected cycle lanes are required at higher traffic speeds. In the Proposed Scheme with the reduction of traffic volumes between the bus gates in a 30 km/h environment, it is not necessary to provide segregated cycle tracks or protected cycle lanes. The volume of traffic along Kimmage Road Lower will range from zero at each bus gate to a maximum of 230 PCU/hr in the vicinity of the Sundrive Road junction midway between the bus gates. This context fits in the boxes that are red-circled on Table 2.1 of the *Cycle Design Manual* as shown below, which confirms that the route will be suitable for most cyclists in Mixed Traffic, or for all cyclists with a Mandatory Cycle Lane. The existing arrangements on Kimmage Road Lower will be retained between the Bus Gates with part-time tidal cycle lanes in the peak direction. Cyclists will also have the choice of two parallel "quiet street" cycle routes through the filtered permeability routes along Derravaragh Road / Larkfield Grove / Priory Rod to the east, or Poddle Park / Blarney Park / Stone Boat Boardwalk / Mount Argus View to the west, both of which bypass the busiest area around the junction at Sundrive Road. In conclusion, Section 1 of the Proposed Scheme will provide a suitable range of route options for cyclists without the need for segregated cycle tracks between the proposed bus gates.

Apart from the section of the Core Bus Corridor between bus gates, as described above, along the rest of the Proposed Scheme continuous segregated cycle tracks will be provided.



Cycle Design Manual — Version 1.0

Table 2.1 - Cycle facilities selection guide

Speed Limit[1]	Two-way traffic flow (peak hour pcus)	Remote Cycleway/ Greenway	Standard cycle track (incl. two-way tracks)	Stepped cycle track	Protected Cycle Lane	Mandatory Cycle Lane	Mixed Traffic
20 km/h	< 200						
	200-400						
	> 400						
30 km/h	< 200						
	200-400						
	> 400						
40 km/h	< 200						
	200-400						
	> 400						
50 km/h	< 200						
	200-400						
	> 400						
60 km/h	Any						
≥ 80 km/h	Any						

Provision should be suitable for most users.
Provision may not be suitable for all and may exclude some potential users (Departure required).
Provision not recommended as it's unlikely to be suitable for a range of users (Departure required).
Provision not suitable.

Notes:
1. If the 85th percentile motor traffic speed is more than 10% above the speed limit, the next highest speed limit should be applied.

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2.11 Dublin Cycling Campaign

Summary of issues raised:

1) Support for Proposed Scheme
2) Achieving National Mobility Policy Targets
3) Universal Design
4) Welcome Design Interventions
5) Elements of the Scheme for Consideration
   5.1 Quality of Cycling Facilities
   5.2 Bus Gate Operating Hours
   5.3 Cycle Track Widths
   5.4 Quiet Street Treatment
   5.5 Speed Limits

Appendix A: location specific comments and observations.

Responses to issues raised:

1) Support for Proposed Scheme

The NTA recognises the benefit that the continued engagement with the Dublin Cycling Campaign and other advocacy groups through the three rounds of non-statutory public consultation, community forums and one to one meetings, has had in developing the Proposed Scheme. The NTA notes that the Dublin Cycling Campaign are generally supportive of the Proposed Scheme, apart from certain elements, and welcomes the support from the charity for implementing the Proposed Scheme. Requests to modify particular detailed design aspects of the Proposed Scheme are noted and the NTA has provided responses to those requests as set out in the following sections. The NTA looks forward to the continuation of collaboration with the Dublin Cycling Campaign in achieving the Proposed Scheme objectives which have many synergies with the as part of their everyday life.

2) Achieving National Mobility Policy Targets

The NTA acknowledges the submission's approach to categorising cyclists by characteristic type and notes that there are multiple industry studies that have taken a similar approach, however, the Proposed Scheme has not set out to target any particular cycling cohort. The Proposed Scheme will provide a safe, sustainable transport corridor that can provide a sustainable alternative mode of transport for all ages and abilities. Comments raised in relation to the recently published National Sustainable Mobility Policy are noted and the Proposed Scheme's aim and objectives as set out in Section 1.2 of Chapter 1 of Volume 2 of the EIAR have a direct alignment to the objectives that underpin this policy.

3) Universal Design

As noted in EIAR Volume 2, Chapter 4, Section 4.6.5 Accessibility for Mobility Users:

> *"The aim of the Proposed Scheme is to provide enhanced walking, cycling and bus infrastructure. In achieving this aim, the Proposed Scheme has been developed using the PDGB and in accordance with the principles of DMURS and Building for Everyone: A Universal Design Approach (NDA 2020).*

The following non exhaustive list of relevant standards and guidelines have informed the approach to Universal Design in developing the Proposed Scheme:

- PDGB (refer to Appendix A4.1 in Volume 4 of this EIAR);
- Building for Everyone: A Universal Design Approach (NDA 2012a);
- How Walkable is Your Town? (NDA 2015);
- Shared Space, Shared Surfaces and Home Zones from a Universal Design Approach for the Urban Environment in Ireland (NDA 2012b);

- Best Practice Guidelines, Designing Accessible Environments. (Irish Wheelchair Association 2020);
- Inclusive Mobility (UK DfT 2005);
- Guidance on the use of Tactile Paving Surfaces (UK DfT 2007); and
- BS8300-1:2018 Design of an accessible and inclusive built environment. External Environment-code of practice (BSI 2012).

The Disability Act 2005 (as amended) places a statutory obligation on public service providers to consider the needs of disabled people. An Accessibility Audit of the existing environment and proposed draft preliminary design for the corridor was undertaken. The Accessibility Audit provided a description of the key accessibility features and potential barriers to mobility impaired people based on the Universal Design standards of good practice. The Accessibility Audit was undertaken in the early design stages with the view to implementing any key measures identified as part of the design development process.

In achieving the enhanced pedestrian facilities there has been a concerted effort made to provide clear segregation of modes at key interaction points along the Proposed Scheme which was highlighted as a potential mobility constraint in the Accessibility Audit. In addressing one of the key aspects to segregation, the use of the 60mm set down kerb between the footway and the cycle track is of particular importance for guide dogs, whereby the use of white line segregation is not as effective for establishing a clear understanding of the change of pavement use and potential for cyclist/pedestrian interactions.

One of the other key areas that was focused on was the interaction between pedestrians, cyclists, and buses at bus stops. The Proposed Scheme has implemented the use of island bus stops, including signal call button for crossing of cycle tracks, to manage the interaction between the various modes with the view to providing a balanced safe solution for all modes."

As noted in section 4.10 Accessibility for Mobility Impaired Users of the Preliminary Design Report:

> *"The aim of the Proposed Scheme is to provide enhanced walking, cycling and bus infrastructure along the corridor. In achieving this aim, the Proposed Scheme has generally been developed in accordance with the principles of DMURS and Building for Everyone: A Universal Design Approach".*

4) Welcome Design Interventions

The NTA welcomes the comments noted in the submission and notes that the proposed measures will meet the aim and objectives of the Proposed Scheme, as set out in section 1.2 of Chapter 1 of Volume 2 of the EIAR.

5) Elements of the Scheme for Consideration

The NTA notes the comments from the Dublin Cycle Campaign in relation to the various elements of the scheme, as set out below with NTA responses to each issue.

5.1 Quality of Cycling Facilities – Kimmage Road Lower

In Section 2.9 earlier in response the submission by the Dublin Commuter Coalition in relation to the same issue it has been explained that the traffic environment along Kimmage Road Lower will be transformed by the proposed bus gates into a "Low-Flow & Slow" context where cyclists can safely and comfortably share the road with a low volume of local access traffic, in accordance with the requirements of the *Cycle Design Manual*. In this context it is not necessary to provide segregated cycling facilities. In the Proposed Scheme the existing part-time cycle lanes that operate in the peak periods inbound in the morning and outbound in the evening will be mostly retained. This arrangement will exceed the requirements of the *Cycle Design Manual* and will ensure that there are no vehicles parked on that side of the street at those times which will provide a clear route for most cyclists along the street.

5.2 Bus Gate Operating Hours

The submission requests extension of the proposed bus gate operational hours, (presumably at Bus Gate No.1 adjoining Ravensdale Park), to include the school closing times in the early afternoon. The

local schools are located east of the core bus corridor on Clareville Road to which the most direct route from the south for cyclists is not along Kimmage Road Lower, but rather along Derravaragh Road and Larkfield Grove which is a quiet streets cycle route with filtered permeability at 3 locations. In addition, the full-time Bus Gate No.2 further north at Harold's Cross will divert most traffic away from Kimmage Road Lower, even when the southern Bus Gate No.1 is open to traffic so that the volume of traffic along Kimmage Road Lower will still be very low within the proposed 30 km/h speed limit, which will be suitable for cycling in mixed traffic. There would be little real benefit gained for cyclists to the local schools by extending the operational hours of the southern Bus Gate No.1, and to do so would impede a small volume of local access traffic during off-peak periods which could impact local businesses.

5.3 Cycle Track Widths

The submission questions the provision of narrow cycle lanes and tracks at two sections of the route:

- Lower Kimmage Road: The Proposed Scheme retains the existing part-time cycle lanes, even though these will no longer be necessary in accordance with the Cycle Design Manual in the context of the proposed bus gates. The narrow width of these cycle lanes is therefore of no significance.
- Harold's Cross Road: As described in EIAR Volume 2, Chapter 4, Description of the Proposed Scheme, Section 4.5.2.1,

  > *"New segregated 1.5m wide cycle tracks will be provided in both directions along R137 Harold's Cross Road. Wider 2m cycle tracks are not feasible in the constrained context of the street as described below."*
  >
  > *"To accommodate the proposed cycle tracks, road widening will be required of typically 2m over a length of 120m from the entrance to Our Lady's Hospice on the western side to the junction of Mount Drummond Avenue on the eastern side. There is a pinch-point between the hospice entrance and the gate of St. Clare's School on the opposite eastern side, where the distance between buildings is just 19m, and the public road width is 17.2m wide at the narrowest point. The proposed road cross-section will be 18m wide to include two 3m bus lanes, two 3m traffic lanes, two 2m footpaths and two 1.5m cycle tracks. Widening of approximately 0.8m will be required on the eastern side to achieve the 18m width."*
  >
  > *"The street width reduces to 18m at the junction of Armstrong Street, 60m south of the junction with the R111 on Parnell Road and Grove Road at the Grand Canal. It narrows further to less than 18m over the final 20m to the corner of R111 Parnell Road, where road widening is proposed with encroachment into the garden space at the Fottrell House office building on the south-western side of the junction."*

  In summary, the 400m long section of Harold's Cross Road in Section 2 of the Proposed Scheme is especially narrow at both the southern and northern ends of the street, where some road widening into private properties will be necessary. It is not physically possible to provide 2m wide cycle tracks in the narrowest part of the street in the vicinity of Our Lady's Hospice and St. Clare's School where there are buildings at, or very close to the back of the footpaths. It was concluded in the design of the Proposed Scheme that it was necessary to limit the proposed cycle tracks to 1.5m along this section to fit within the spatial constraints and to minimise the encroachment into the gardens of houses. While 2m wide cycle tracks could perhaps be provided over a part of this route section, such localised widening would be inconsistent and possibly hazardous where it would narrow down again and force overtaking cyclists into single file again. It is better to transition to wider cycle tracks at a major junction rather than in mid-link. For a cyclist travelling at a typical speed of 15 km/h to 20 km/h, it would take less than 2 minutes to travel along the 400m length of this street, so that the constraint of single-file cycling will have minimal impact in terms of delay.

Later in the Appendix A comments on specific locations the submission also queries other locations with narrow cycle tracks on Clanbrassil Street and New Street South. The same explanations apply to those locations where there are severe spatial constraints between buildings at the back of the footpaths. This issue was raised in the submission by the City Architect's Department of Dublin City Council as responded to earlier in Section 2.9.

5.4 Quiet Street Treatment

The submission suggests the need for interventions along the two proposed “quiet street” cycle routes to the east and west of Kimmage Road Lower. However, these local residential streets are already in a suitable condition for cyclists, as they are quite narrow, with no centreline road marking, speed control ramps at intervals, and on-street parking which all restrict traffic speeds to less than 30 km/h. No further interventions are necessary along these alternative cycle routes.

5.5 Speed Limits

The submission welcomes the 30 km/hr speed limit proposed within the scheme, but queries how this will be executed from a legislative perspective, as speed limit changes are in the remit of local authorities. The submission raises further concerns about enforcement and requests that driver behaviour with respect to speed limits is cultivated through engineering design interventions.

With respect to adoption of speed limit changes, the NTA will continue with the very positive and constructive liaison with local authorities to ensure that speed limit changes as proposed are adopted.

With the proposed bus gate restrictions for through traffic along Kimmage Road Lower, it is expected that most drivers on the street will live or work locally, which should increase their likelihood of compliance with the proposed 30 km/h speed limit. Along much of Kimmage Road Lower informal on-street parking is permitted when the part-time cycle tracks are not in operation. Such parking on the street restricts the effective road width and impedes two-way traffic flow to an extent which naturally leads to lower traffic speeds. With the reduction in through traffic, it is likely that more drivers will feel comfortable parking on the street, so that the associated traffic-calming effect is likely to increase.

In the Proposed Scheme there will be changes to the road layout at several locations which will further reduce traffic speeds. A “gateway” will be provided at Bus Gate No.1 near the junction of Ravensdale Road, where the start of the 30 km/h speed limit will be prominently displayed by large signs as shown on General Arrangement Drawing Sheet No.1 (EIAR Volume 3 Figures, Part 2). Immediately north of the bus gate where Kimmage Road Lower is unusually wide, a median island with trees will be introduced over a length of 170m. The line of street trees in the middle of the road should have a powerful visual effect on driver behaviour to proceed slowly. Approaching the junction of Sundrive Road the road carriageway will narrow to 6m and a new parking bay with street trees at intervals will be provided on the eastern side of the street over a length of 150m, followed by major changes at the junction where the road area will be greatly reduced through footpath widening at the corners. Further north at the junction with Mount Argus Way the existing road widens and there are left-turn and right-turn lanes. These turning lanes will be removed and sections of cycle tracks with protective islands will be provided. The combined effect of these various elements of the Proposed Scheme will be to reduce the effective width of the road carriageway to provide a more consistent road layout along Kimmage Road Lower, which will complement the proposed lower speed limit as is recommended by the *Design Manual for Urban Roads and Streets*.

Appendix A

The submission contains an appendix which outlines a number of location specific comments and observations, which are examples of the general issues raised in the submission. The responses to the general submissions address each of the specific issues raised in the appendix.

3. Response to Individual Submissions on the Proposed Scheme

3.1 Ref. No.1 – Ann O'Connell

Submission Location – 52 Derravaragh Road, Terenure

The submission raised the following issues:

1) Objection to road closure at junction with Corrib Road.
2) Only 1 access route from Kimmage Road Lower / traffic congestion at junction.
3) Turn restrictions at Terenure Road West instead.
4) Planters instead of bollards, and also at next existing closure to the north.

Response to submission

Detailed responses to the issues raised in this submission are provided in Section 2.5 of this report.

3.2 Ref. No.2 – Anna Rackard

Submission Location – 91 Corrib Road, Terenure

1) Objection to road closure at junction with Corrib Road.
2) Only 1 access route from Kimmage Road Lower / traffic congestion at junction.
3) Turn restrictions at Terenure Road West instead.
4) Travels daily to Wicklow.

Response to submission

Detailed responses to the issues raised in this submission are provided in Section 2.5 of this report.

3.3 Ref. No.3 – Anne O'Flaherty

Submission Location – 28 Greenmount Close, Harold's Cross

1) Traffic Noise closer to home & Air quality
2) Move of bus stop

Response to submission

Detailed responses to the issues raised in this submission are provided in Section 2.6 of this report.

3.4 Ref. No.4 – Brendan Heneghan

Submission Location – 88 Parkmore Drive, Terenure

1) 4 bus gates proposed should be reduced to 1 only at Harold's Cross Park.
2) Very small time saving for bus (EIAR Chp 6, p.79 & 83) does not justify the bus gates.
3) Queries different modal shift figures for 2028 & 2043 & other technical queries about TIA.
4) Comparison of benefits with other CBC schemes are unimpressive.
5) Corridor not in Transport Strategy for GDA.
6) Consultation process non-compliant with Aarhus Convention.
7) Procedural issues with notices.
8) Diversion of traffic onto local residential roads & longer local trips.
9) Cumulative traffic restrictions across the wider area of 3 CBCs.
10) Commercial impacts for Kimmage Village.
11) Reduced traffic lanes and right-turns at Robert Emmet Bridge and Leonard's Corner junction.
12) Restrictions for lorries on Kimmage Road Lower.
13) Traffic capacity on Terenure Road North / Harold's Cross Road with diversion by Rathfarnham / Templeogue CBC.
14) Overall scheme benefits are very limited for unjustified disruption.
15) Roads too narrow to fit layout and no dimensions on maps.

16) Various queries about aspects of the scheme design. Examples:
    a. Left-slip lane SB at KCR necessary for No.74 bus.
    b. Parapet wall removal on Clanbrassil Street Upper west side.
17) NTA funded professional advice for other communities on other schemes?
18) Metro should have been considered.
19) Many references to separate submissions for Templeogue-Rathfarnham CBC and other schemes.
20) Flawed planning application process.

Response to submission

Detailed responses to the issues raised in this submission are provided in Section 2.4 of this report.

Issue No.20: The submission says that *"administrative errors make the application wholly invalid or defective and that the NTA should have to make a fresh application"*.

There were two extensions of the period for public consultation on this Proposed Scheme which the NTA provided in relation to two administrative errors which were identified and corrected by the NTA.

As set out in the newspaper notice which was published on 14 September 2023, it came to the NTA's attention that two of the NTA's non-statutory Site Notices had been erected in the wrong locations along the Proposed Scheme. This issue was rectified on 18 August 2023 and all of the non-statutory Site Notices were in the correct locations from that date. An extension of time for the inspection of the application documents and for the making of submissions to 7 November 2023 was provided so as to ensure full and effective public participation.

However, as set out in the newspaper notice which was published on 26 October 2023, it subsequently came to the NTA's attention that:

> "due to an administrative error, a certain Junction Design Report was omitted from Appendix 2 to the Traffic Impact Assessment Appendix (Appendix 6.1) contained within Volume 4 Appendices to the hard copy of the Environmental Impact Assessment Report that was available for inspection at (i) the offices of the NTA, and (ii) the offices of An Bord Pleanála. Note that this Junction Design Report was available for inspection in the electronic copies of the EIAR at Appendix 2 of Appendix 6.1 (i) on the website of the NTA at www.kimmagescheme.com and (ii) on the website of An Bord Pleanála at https://www.pleanala.ie/en-ie/case/317660 and was separately available elsewhere in the EIAR at Appendix 6.3 to the electronic and hard copies of the Environmental Impact Assessment Report. This discrepancy has now been rectified and the Junction Design Report is included in the hard copies of the EIAR at (i) the offices of the NTA, and (ii) the offices of An Bord Pleanála."

A further extension of time for the inspection of the application documents and for the making of submissions to 8 December 2023 was provided so as to ensure full and effective public participation.

There can be no suggestion that the above minor administrative errors in any way render the NTA's application invalid or defective as these minor errors were remedied when they were identified, and further time was given for the inspection by the public of the application documents and for the making of submissions to the Board so as to best ensure full and effective public participation.

Mr Heneghan asserts that the application should be rejected on the basis of certain minor technical administrative errors in the soft copy files which were originally provided to the Board on 25 July 2023.

As set out in the NTA's letter of 27 July 2023 which is available on the Board's website, the NTA identified certain formatting and cross-referencing errors in the soft copy files provided to the Board on 25 July 2023. There were no such issues with the hard copy documents provided to the Board on that date.

In rectifying these issues as quickly as possible once they came to the NTA's attention, the NTA provided the Board with the soft copy files with these formatting and cross-referencing errors corrected under letter dated 27 July 2023.

The public consultation on the Kimmage Scheme began on 1 August 2023 and the corrected documents were available for inspection by the public on that date (i) online on the Board's website, (ii) on the

NTA's website for the Kimmage Scheme, (iii) physically in the Board's Office and (iv) physically in the NTA's Offices in accordance with the newspaper notice dated 27 July 2023.

Given that the corrected documents were provided to the Board as quickly as possible and that the documents with these minor formatting and cross-referencing errors were never available for public inspection, there is no basis for the assertion that the application for the Kimmage Scheme should have been rejected.

3.5 Ref. No.5 – Caitríona Dempsey

Submission Location – 1 Mount Argus Square

1) Objection to Stone Boat Boardwalk and cycle route through residential estate: security risk and anti-social behaviour.
2) Cycle route on narrow residential road with 3 sharp bends.
3) Alternative cycle route through Eamonn Ceannt Park.

Response to submission

Detailed responses to the issues raised in this submission are provided in Section 2.5 of this report.

3.6 Ref. No.6 – Capital Glass Company Limited

Submission Location – 61a/62 Clanbrassil Street Lower

1) Restrictions for delivery at business due to bus lane. Skip under permit (on street?)

Response to submission

Detailed responses to the issues raised in this submission are provided in Section 2.7 of this report.

3.7 Ref. No.7 – Carol Michael

Submission Location – 24 Greenmount Close

1) Traffic Noise closer to home
2) Air quality

Response to submission

Detailed responses to the issues raised in this submission are provided in Section 2.5 of this report.

3.8 Ref. No.8 – Ciarán Coffey

Submission Location – 436 Clonard Road, Kimmage

1) Bus gate at Ravensdale Park and traffic diversions onto residential roads and section of cycle route.
2) Safety of cycle route on Sundrive Road.
3) Social equity of road closure for one community to access to various amenities and businesses.

Response to submission

Detailed responses to the issues raised in this submission are provided in Section 2.5 of this report.

3.9 Ref. No.9 – Councillor Anne Feeney (Fine Gael)

Submission Location – Submission as both public representative and local resident close to KCR.

1) Assessment required of 3 CBCs in combination.
2) Insufficient increase in bus frequencies or time savings to justify scheme.
3) Limited cycling facilities along the CBC.

4) Traffic diversion impacts from bus gates in local residential roads.
5) Buses will be delayed in Fortfield Road, Kimmage Road West and Terenure Road West.

Response to submission

Detailed responses to the issues raised in this submission are provided in Section 2.4 of this report.

3.10 Ref. No.10 – Councillor Carolyn Moore (Green Party)

Submission Location – Overall Scheme

1) Supportive of scheme and proposed public realm improvements.
2) Comments on specific aspects of the proposals at Sundrive Cross.
3) Emphasises how pedestrian facilities should be improved, much of which is provided for in the scheme. Continuous footpaths rather than raised tables at side street junctions. No treatment at some side street junctions?
4) Request for additional pedestrian crossings at various locations.
5) Harold's Cross Road south of the park needs improvements for pedestrians and cyclists.
6) Higher quality and wider cycle tracks sought. Parking prioritised over cycle lanes south of Sundrive Cross.
7) Signal priority for cyclists at junctions.
8) Distinct surface treatment on quiet street cycle routes.
9) Camera-based enforcement of bus lanes and 30 km/h speed limits.
10) Queries the benefits of the Stone Boat cycle route.
11) *"Failure of NTA to provide cumulative traffic modelling or the impacts of several corridors.."* Access routes for HGVs and deliveries?
12) Monitoring of scheme in operation.
13) Alternative routes for local traffic and need for further modal filters?

Response to submission

Detailed responses to the issues raised in this submission are provided in Sections 2.4 and 2.5 of this report.

3.11 Ref. No.11 – Councillor Pat Dunne & Joan Collins TD and Others (Right to Change)

Submission Location – Overall Scheme & Section 1

Signed by 120 residents of Kimmage, Crumlin and Terenure

1) Supportive of the scheme in principle.
2) Bus gate and traffic diversions westward into Kimmage/Crumlin residential area along Lorcan O'Toole Park and Stannaway Road and adjoining streets.
3) Opposition to closure of Poddle Park and Derravaragh Road to traffic.
4) Welcome for the Stone Boat link, but it should continue through Mount Argus.
5) New bus routes should become operational before the bus gates are in place.
6) Removal of 83 bus terminus will have negative impact for some residents.

Response to submission

Detailed responses to the issues raised in this submission are provided in Sections 2.4 and 2.5 of this report.

3.12 Ref. No.12 – Councillor Punam Rane (Fine Gael)

Submission Location – Overall Scheme

1) Scheme is supported by residents on Kimmage Road Lower to reduce traffic.
2) Opposition to the scheme in area around Terenure Road West and Ravensdale/Cashel/Stannaway for fear of displaced traffic.

3) More difficult access to streets of Kimmage Road Lower and Bus gate at Kenilworth east.
4) Loss of business in Kimmage Village.
5) Access to Mount Argus and Mount Jerome Cemetery.

Response to submission

Detailed responses to the issues raised in this submission are provided in Sections 2.4 and 2.5 of this report.

3.13 Ref. No.13 – Colin Price (and Aileen Price)

Submission Location – 15 St. Martin's Park, Kimmage and for 195 Kimmage Road Lower

1) Southern bus gate should operate only 5 days rather than 7 days a week, with shorter hours.
2) Parking on west side of KRL at Sundrive is private and EIAR Chapter 6 is incorrect.

Response to submission

Detailed responses to the issues raised in this submission are provided in Section 2.5 of this report.

3.14 Ref. No.14 – Cornelia Raftery

Submission Location – 52e Mount Argus Road, Harolds Cross

1) Objects to proposals at southern end of Harold's Cross Park.

Response to submission

Detailed responses to the issues raised in this submission are provided in Section 2.5 of this report.

3.15 Ref. No.15 – Corrib Road Residents

Submission Location – c/o Mary McCabe, 85 Corrib Road, Terenure

Signed by 27 residents.

1) Objection to traffic closure on Derravaragh Road.
2) Longer diversion route going south.
3) Impact for local shops.

Response to submission

Detailed responses to the issues raised in this submission are provided in Section 2.5 of this report.

3.16 Ref. No.16 – Daniel Martin

Submission Location – Apartment 60 Greenville Place, Dublin 8 (west side of Clanbrassil Street Lower at St. Patrick's Court)

1) Construction compound should be located elsewhere.
2) Planting of trees in front of the first-floor apartment will reduce light.

Response to submission

Detailed responses to the issues raised in this submission are provided in Section 2.7 of this report.

3.17 Ref. No.17 – Dawnlane / Rodney & Vanessa Cassidy

Submission Location – Mullen Scrap, 31 Clanbrassil Street Upper

1) No Strategic Environmental Assessment for the overall BusConnects Programme.

Response to submission

A detailed response to the issue raised in this submission is provided in Section 2.4.1 of this report.

3.18 Ref. No.18 – Deirdre Pender

Submission Location – 33 Harold's Cross Road

1) Traffic diversions by bus gates and impacts on alternative routes, in combination with the other 2 CBC schemes in the wider area. Clareville Road & schools.
2) Different bus gates operational hours.
3) Road layout at Harold's Cross Park South.
4) Parking on LKR south of Sundrive and removal of cycle lanes.
5) Cycle track at 79-85 Harold's Cross Road behind the parking.
6) Aesthetics of footbridges over the canal.
7) Drainage problems on Harold's Cross Road / Mount Drummond.

Response to submission

Detailed responses to the issues raised in this submission are provided in Sections 2.6 and 2.7 of this report.

For Issue No.3 this submission says that there is an incorrect label on General Arrangement Drawing Sheet No.6 which points to "Existing parking to be removed" on the northern side of the short link street at the southern end of Harold's Cross Park. That label should say "Existing footpath to be removed". This error is corrected in this response.

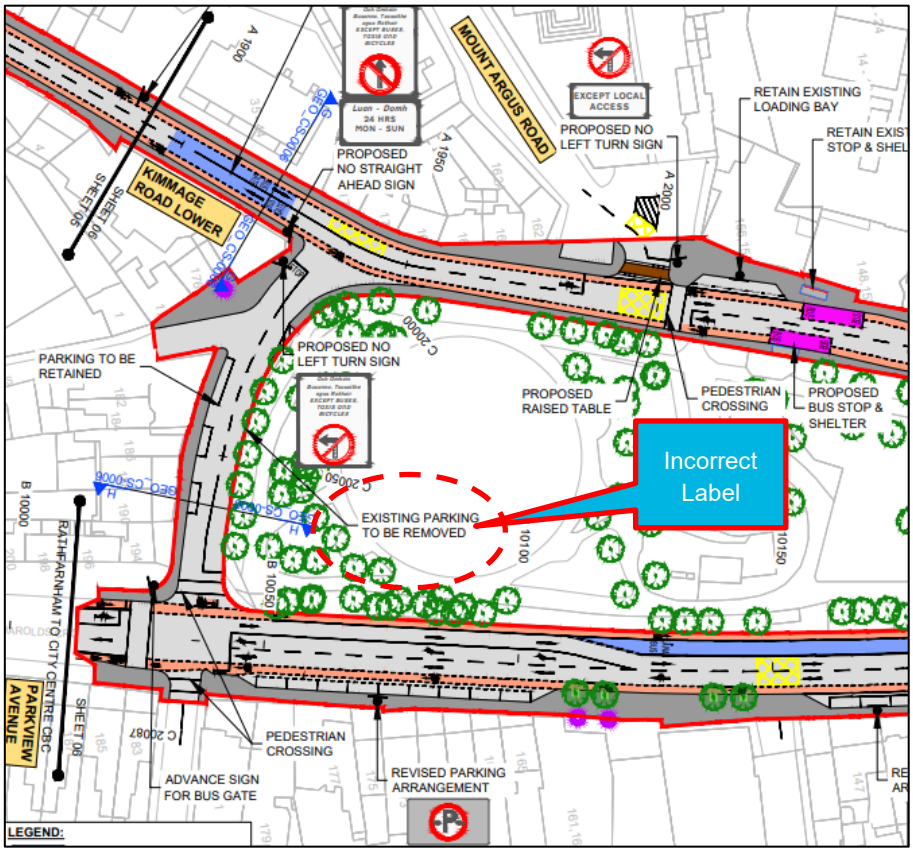

Figure 3-1: General Arrangements Drawing Sheet No.6 at Harold's Cross Park South

3.19 Ref. No.19 – Development Application Unit

Submission Location – Overall Scheme

1) Only archaeology addressed.
2) 4 standard conditions sought:
   a) All mitigation measures in EIAR to be implemented in full.
   b) Construction Environmental Management Plan to address all archaeological and cultural heritage constraints.
   c) Project Archaeologist

d) Records to be retained and shared.

Response to submission

Detailed responses to the issues raised in this submission are provided in Section 2.8 of this report.

3.20 Ref. No.20 – Dr. Nichola Walsh & Mr. Kealan McGuinness

Submission Location – 32 Corrib Road

1) Objection to closure of Derravaragh Road to traffic

Response to submission

A detailed response to the issue raised in this submission is provided in Section 2.5 of this report.

3.21 Ref. No.21 – Dublin City Council

Submission Location – Overall Scheme

Dublin City Council made a comprehensive and broad-ranging submission covering the following broad themes:

1) Planning.
2) Archaeology.
3) Parks, Biodiversity & Landscape
4) Architecture.
5) Traffic & Roads.
6) Environmental Protection and water quality.

Response to submission

Detailed responses to this submission are provided in Section 2.9 of this report.

3.22 Ref. No.22 – Dublin Commuter Coalition

Submission Location – Overall Scheme

1) Support for Proposed Scheme
2) Enforcement of bus lanes, bus gates, turn bans, etc.
3) Bus lanes and bus gates operational hours should be 24/7.
4) Provisions for cyclists at junctions do not fully comply with the Cycle Design Manual with insufficient segregation for cyclists as Ravensdale, Mount Argus View and Harold's Cross Road / Kimmage Road Lower.
5) Bus stop islands too narrow in several places with cycle track between shelter and road.
6) Missing pedestrian crossings at some junctions, e.g.: Harold's Cross Road / Park View.
7) Cycle parking insufficient.
8) No segregation for cycle tracks in several places.

Response to submission

Detailed responses to this submission are provided in Section 2.10 of this report.

3.23 Ref. No.23 – Dublin Cycling Campaign

Submission Location – Overall Scheme

1) Support for Proposed Scheme
2) No cycle tracks on Kimmage Road Lower between bus gates.
3) Southern bus gate hours in afternoon should start earlier for school traffic.
4) Cycle tracks too narrow in places.
5) Quiet streets cycle routes need more measures to influence traffic behaviour.
6) Enforcement for 30 km/h speed limit?

Response to submission

Detailed responses to this submission are provided in Section 2.11 of this report.

3.24 Ref. No.24 – Eilish Kenna

Submission Location – 7 Hazel Park, Kimmage

1) Recent bus service changes require changing between 2 routes instead of No.17.
2) Longer car journeys with bus gate.

Response to submission

A detailed response issue No.1 raised in this submission is provided in Section 2.4 of this report.

A detailed response to issue No.2 raised in this submission is provided in Section 2.5 of this report.

3.25 Ref. No.25 – Elisha O'Brien

Submission Location – 47 Derravaragh Road

1) Objection to road closure at Corrib Road junction.

Response to submission

A detailed response to the issue raised in this submission is provided in Section 2.5 of this report.

3.26 Ref. No.26 – Eoin Duggan

Submission Location – 7 Mount Argus View, Harold's Cross

1) Objection to Stone Boat cycle route.

Response to submission

A detailed response to the issue raised in this submission is provided in Section 2.5 of this report.

3.27 Ref. No.27 – Estrella Vaquero

Submission Location – 44 Clanbrassil Street Upper

1) Bus stop in front of the house.

Response to submission

Bus Stop 1290 will be moved 5m north of the existing location to where the footpath is slightly wider, and a narrow boarding island can be accommodated outside the proposed cycle track.

3.28 Ref. No.28 – Gailot et Gray c-o Emma Gray & Gilles Gailot

Submission Location – 59 Clanbrassil Street Lower

1) Disruption for loading at business.

Response to submission

A detailed response to the issue raised in this submission is provided in Section 2.7 of this report.

3.29 Ref. No.29 – Gerard & Michelle Madden

Submission Location – 19 Mount Argus Court, Harold's Cross

1) Objection to Stone Boat cycle route

Response to submission

A detailed response to the issue raised in this submission is provided in Section 2.5 of this report.

3.30 Ref. No.30 – Gill Ventures Ltd - Halal Food and Grocery

Submission Location – 60/60A Lower Clanbrassil Street

1) Disruption for loading at business.

Response to submission

A detailed response to the issue raised in this submission is provided in Section 2.7 of this report.

3.31 Ref. No.31 – Gordon's Fuels

Submission Location – 32A Clanbrassil Street Upper

1) Impact of CPO for property.

Response to submission

Responses to this submission are provided separately in relation to CPO Objections.

3.32 Ref. No.32 – Harolds Cross Tidy Towns Committee

Submission Location – Overall Scheme

1) Supportive of the Proposed Scheme in general and of the public realm improvements in particular at Sundrive Cross / Kimmage Village. Makes various suggestions for additions / amendments.
2) Request for public seating, bins, cycle parking.
3) Seeks wider area Smart-City mobility measures, electric vehicle charging points.
4) Group had plans for more landscaping at Robert Emmet Bridge.
5) Public realm improvements at southeast gate to Harold's Cross Park. Concern about proposed reduction of footpath area.
6) Replacement of street trees on eastern side of. Harold's Cross Road between St. Clare's and Mount Drummond.

Response to submission

Detailed responses to the issues raised in this submission are provided in Sections 2.5 and 2.6 of this report.

In relation to landscaping at Robert Emmet Bridge, the Proposed Scheme will slightly reduce the area available for planting where the new footbridge piers and abutments will be located, as well as along Parnell Road where there will be minor road widening. When the works are completed and the proposed new trees are planted along the edge of Parnell Road, these areas will be available for further planting by the local group if they wish to do so.

3.33 Ref. No.33 – Hugh Kearns

Submission Location – 25 Moeran Road, Walkinstown

1) Bus gates should finish earlier than 10am and not 7 days a week.
2) Parking on west side of Kimmage Road Lower south of Sundrive Cross is private.
3) No analysis of combined impacts of parallel CBCs.
4) *Poddle Way* cycle route west of corridor is not justified.

Response to submission

Detailed responses to the issues raised in this submission are provided in Sections 2.4 and 2.5 of this report.

3.34 Ref. No.34 – Hugh Raftery

Submission Location – 79 Corrib Road

1) Supportive of Proposed Scheme and lists numerous local and wider benefits.

Response to submission

This submission is noted.

3.35 Ref. No.35 – Irene Lewis & Eoin Lewis

Submission Location – 20 Corrib Road

1) Bus Corridor desirable, but
2) Objection to proposal to close Derravaragh Road at Corrib Road affecting commute to Co. Wicklow.

Response to submission

A detailed response to the issue raised in this submission is provided in Section 2.5 of this report.

3.36 Ref. No.36 – Isabelle Walsh

Submission Location – 6 Mount Argus Way, Harold's Cross

1) Objection to Stone Boat cycle route. Restore the plaque that indicates that the 'Stoneboat built in 1245 AD was restored by Tiernan Builders 1990 AD',
2) River Poddle "Kingfisher" wildlife project. Risk of loss of biodiversity.
3) Alternative cycle route through Eamonn Ceannt Park.

Response to submission

Detailed responses to the issues raised in this submission are provided in Section 2.5 of this report.

3.37 Ref. No.37 – Ivana Bacik TD

Submission Location – Overall Scheme

1) Support for the Proposed Scheme, with specific reference to widening at Emmet Bridge, KCR junction and public realm improvements, but disappointed at reduced public realm proposals in Kimmage Village.
2) Extend (southern) bus gate hours to include afternoon primary school closure time.
3) Bus gate enforcement?
4) Access for Larkview Football Club.
5) Reinstate proposed cycle route through Mount Argus Park.
6) Lack of cycle tracks along Kimmage Road Lower / narrow in places.
7) Bus Network redesign for Route 18 and request that new Route 82 is provided sooner.
8) Minimise disruption for local communities during construction, with regular public information.
9) Protect biodiversity and retain trees as much as possible.
10) Fee of €50 for observations to An Bord Pleanála inhibits public engagement.

Response to submission

Detailed responses to the issues raised in this submission are provided in Sections 2.4, 2.5, and 2.7 of this report.

3.38 Ref. No.38 – James Purcell

Submission Location – 128b Kimmage Road Lower

1) Objection to the proposed bus gates and longer traffic routes / request for "white listing" local traffic to retain direct access.

2) "Raised paving" from 126 to 136 Kimmage Road Lower.
3) Road markings and signs not to impede access to laneway just to the south of the house which provides access to a garage at the rear.
4) 30 km/h speed limit is not realistic.

Response to submission

Detailed responses to the issues raised in this submission are provided in Section 2.5 of this report.

3.39 Ref. No.39 – Jeff Kelly

Submission Location – 5 Mount Argus View, Harold's Cross

1) Objection to Stone Boat cycle route.
2) Objection to the proposed bus gates and longer traffic routes.
3) Replacement of 2 inbound bus stops with 1 north of KCR.

Response to submission

Detailed responses to the issues raised in this submission are provided in Section 2.5 of this report.

3.40 Ref. No.40 – Jim O'Brien

Submission Location – 52E Mount Argus Road, Harold's Cross

1) Removal of footpath beside southern end of Harold's Cross Park and risk to trees in the park behind the boundary. Gate at southwest corner.
2) Reduced public realm in Kimmage Village / cycle lanes removed for on-street parking.
3) Cycle route no longer through Mount Argus Park and Church.

Response to submission

Detailed responses to the issues raised in this submission are provided in Section 2.5 of this report.

3.41 Ref. No.41 – Kenilworth Park Residents' Association

Submission Location – c/o Dermot Morahan, 79 Kenilworth Park.

106 member households west of Harold's Cross Road

1) Support for the Proposed Scheme in principle.
2) Previous proposal for no left-turn eastbound from Sundrive Road to Kimmage Road Lower has been omitted from the Proposed Scheme – should be included.
3) Supports the submission by the Harolds Cross Tidy Towns Committee, with various concerns repeated.
4) Robert Emmet Bridge: alternative proposal to provide signal-controlled priority for buses and not to provide footbridges for widening with bus lanes.
5) Enforcement of all traffic restrictions?
6) Bus Gate hours: why not open from 23:00 to 06:00, or even after 20:00. Inconsistent.
7) Why widen Harold's Cross Road at No.33 to 61?

Response to submission

Detailed responses to the issues raised in this submission are provided in Sections 2.4, 2.5, 2.6 and 2.7 of this report.

3.42 Ref. No.42 – Larkfield Football Club

Submission Location – 14 Greenlea Park. Mark Caslin, Juvenile Chairman

1) Objection to southern bus gate that will impede access for members of the club from the south between 6pm and 8pm when training takes place.
2) Not safe for child players to cycle.

3) Traffic survey data is from pre-COVID and out of date.

Response to submission

Detailed responses to the issues raised in this submission are provided in Sections 2.4 and 2.5 of this report.

In relation to the safety of cycling for children to the football club, the proposed bus gates and lower speed limit will transform Kimmage Road Lower into a low-flow and slow street that is perfectly suitable for all cyclists to share the road with a small volume of local traffic. In this context it should be hoped that fewer families will drive their children to the club and that more will cycle.

3.43 Ref. No.43 – Larkfield Residents Association

Submission Location – Larkfield Park & 1-23 Larkfield Grove

1) CBC will divert more traffic through Larkfield Park and Clareville Road past 2 primary schools.
2) Right-turn southbound from Harold's Cross Road will send more traffic through residential area.

Response to submission

Detailed responses to the issues raised in this submission are provided in Section 2.5 of this report.

3.44 Ref. No.44 – Estate of Agnes Cassidy

Submission Location – Mullen Scrap, 31 Clanbrassil Street Upper

1) Failure to properly comply with the EIA Directive.
2) NIS is deficient.
3) EIAR does not refer to the type of business at this property.
4) Various risks for ecology to Grand Canal and contaminated waste excavation.
5) Technical queries about scheme lengths quoted.
6) Access to lands extinguished.

Response to submission

Detailed responses to Issues (1) and (2) raised in this submission are provided in Section 2.4.3 of this report.

Issue No.3: The Proposed Scheme does not entail works that would impact the main premises of this property that would impact directly on the scrap metal recovery business. In that regard the nature of the business is not relevant to the EIAR.

Issue No.4: The works for the Proposed Scheme at this location will entail the removal of the existing 18th Century masonry retaining wall along the edge of the access lane in front of the premises to enable widening of the laneway for shared access to the Gordon's Fuels property next door to the south.

Section 14.5 in Chapter 14 in Volume 2 of the EIAR sets out the mitigation measures to be implemented with regard to the excavation of potentially contaminated ground:

"…. The appointed contractor will be responsible for regular testing of excavated soils to monitor the suitability of the soil for reuse. Samples of ground suspected of contamination will be tested for contamination by the appointed contractor during the detailed ground investigation and ground excavated from these areas will be disposed of to a suitably licensed or permitted site in accordance with the current Irish waste management legislation. Any dewatering in areas of contaminated ground shall be designed by the appointed contractor to minimise the mobilisation of contaminants into the surrounding environment."

It should also be noted that the existing ground levels fall steeply to the north and away from the Grand Canal such that there is no groundwater flow-path towards the canal that could form a risk of hydrological contamination of the canal.

In addition, the Surface Water Management Plan (SWMP), contained in Section 5.4 in Appendix A5.1 in Volume 4 of the EIAR details the control and management measures for avoiding, preventing, or reducing any significant adverse impacts on the surface water environment during the Construction

Phase. Issue No.5: This submission queries how the Proposed Scheme, which is 3.7km in length can provide 7.4km of bus priority and 8km of cycling infrastructure. The explanation is that the lengths of these facilities are the sum in both directions. The Proposed Scheme is described in this way as there can be differences in length in each direction, where for example there might be a section in one direction without bus priority. The length for cycling facilities includes the quiet street cycle route via Mount Argus to Sundrive Road and continuing along Blarney Park and Poddle Park, which is slightly longer than the bus corridor along Kimmage Road Lower.

Issue No.6: Suitable access to the Mullen Scrap (Dawnlane) property will be retained both during the works for the Proposed Scheme, and after those works are completed.

Responses to this submission are also provided separately in relation to CPO Objections.

3.45 Ref. No.45 – Liam Smyth

Submission Location – Kimmage Grove

1) Supports the Proposed Scheme with some observations.
2) Poles for overhead cables obstruct the footpaths along Kimmage Road Lower and should be relocated.
3) More street trees – Kimmage Village, Sundrive Road and Parnell Road. Public realm proposals reduced south of Sundrive Cross.

Response to submission

The support for the Proposed Scheme is noted and welcomed.

Issue No.2: As part of the proposed public realm improvements in Kimmage Village the overhead cables will be diverted underground. Elsewhere along Kimmage Road Lower there is no change proposed to the overhead cables as the existing footpaths will be retained.

Issue No.3 is addressed in Section 2.5 of this report.

3.46 Ref. No.46 – Linda Patton

Submission Location – 6 Rathdown Court, Terenure (off Corrib Road)

1) Objects to the Proposed Scheme, and the combined impact of 3 CBCs in the wider area.
2) Bus Gate hours should be reduced.
3) EIAR NTS reference to bus gate at Kenilworth unclear.
4) Transport strategy is out of date from pre-COVID.
5) Cumulative impact of all 12 CBC schemes.
6) EIAR Chapter 21 omits Eirgrid projects.
7) METRO should be considered.
8) Restrictions for residents on Terenure/Kimmage to access local services (by car presumably). Numerous example trips described such as to Siopa Linn in Harold's Cross.
9) Supports the principle of the proposals, including segregated cycle tracks.
10) Consultation process impacted by COVID.

Response to submission

Detailed responses to most of the issues raised in this submission are provided in Sections 2.4 and 2.5 of this report.

Issue No.3: The EIAR Non-Technical Summary provides a brief description of the Proposed Scheme and does not include details of the operational hours for any of the four bus gates. These details are provided elsewhere in the scheme application documents as is explained in Section 2.4.5 of this report.

Issue No.8: For the example trip described in this submission from Kimmage Grove to Siopa Linn in Harold's Cross, the existing route by car is 1.5km long, and when the bus gate is implemented it will be diverted via Clareville Road, Kenilworth Park, and Harold's Cross Road, which is 2.1km long.

3.47 Ref. No.47 – Lisa Harrington

Submission Location – 37 Harold's Cross Road (in CPO)

1) Property impacts and landscaping of garden.

Response to submission

Responses to this submission are provided separately in relation to CPO Objections.

3.48 Ref. No.48 – Lower Kimmage Road Residents' Association (LOKRA)

Submission Location – Joan Moore, 200 Kimmage Road Lower

1) Supports the Proposed Scheme and prefers the Bus Gates to widening for Bus Lanes.
2) Southern bus gate hours in afternoon should start earlier for school traffic.
3) Traffic calming measures required in 30 km/h zone.
4) Request for "white listing" local traffic to retain direct access.
5) Access for deliveries, such as to McGowan's pub and bin lorries – not addressed. Permit system?
6) Previous proposal for no left-turn eastbound from Sundrive Road to Kimmage Road Lower has been omitted from the Proposed Scheme – should be included.
7) Practicality of bus shelters on narrow footpaths (2440 Aideen Avenue, 2391 Priory Road, 2390 Kenilworth Park).
8) Platforms requested at minor side-street junctions.
9) More pedestrian crossings along Kimmage Road Lower.
10) Removal of footpath at south end of Harold's Cross Park.
11) Sone Boat boardwalk link is queried.
12) Durability of red surfacing for advisory cycle lanes between Sundrive and Harold's Cross Park.
13) Traffic management measures at schools on Clareville Road.
14) Local sustainable mobility facilities.
15) Regrets reduced public realm proposals in Kimmage Village.
16) Future maintenance of new landscaping?
17) Artwork element proposed at NW corner of Sundrive Cross.
18) EV charging points.
19) Overhead cables should be moved underground.
20) Not supportive for widening Harold's Cross Road at No.33 to 61.
21) Various queries and comments about parking on Kimmage Road Lower south of Sundrive Road.
22) Concerned about visual obstruction of Robert Emmet Bridge – signal priority alternative.
23) Park & Ride required further south (not out at Kill).
24) Bus Gate enforcement and advance signage at M50.
25) Rationalise signs along KRL and reduce clutter.
26) Insufficient traffic modelling information.
27) No commitment to monitoring of scheme in operation and ongoing community engagement.

Response to submission

Detailed responses to the issues raised in this submission are provided in Sections 2.4, 2.5, 2.6 and 2.7 of this report.

3.49 Ref. No.49 – Margaret McEntegart

Submission Location – 128a Kimmage Road Lower

1) Objection to the proposed bus gates and longer traffic routes / request for "white listing" local traffic to retain direct access.
2) "Raised paving" from 126 to 136 Kimmage Road Lower.
3) Wheel-chair user, but not permitted a disabled parking space on-street, as house has rear access.
4) Road markings and signs not to impede access to laneway to rear of property.

5) Shelter at Bus Stop 2391 Priory Road is impractical.
6) 30 km/h speed limit is not realistic.

Response to submission

Detailed responses to the issues raised in this submission are provided in Sections 2.4 and 2.5 of this report.

3.50 Ref. No.50 – Martin Kelly

Submission Location – Apartment 44 Greenville Place, Clanbrassil Street Lower

1) Construction compound should be located elsewhere.
2) Planting of trees in front of the apartment will reduce light.

Response to submission

Detailed responses to the issues raised in this submission are provided in Section 2.7 of this report.

3.51 Ref. No.51 – Mary Seery Kearney, Senator (Fine Gael)

Submission Location – Overall Scheme

1) Premise of the Proposed Scheme is flawed, traffic data is out of date, displaced traffic will increase air pollution,
2) No benefits for walking.
3) Cycling facilities along the CBC should be segregated / quiet street cycle routes are not welcomed by residents on those streets.
4) Other measures better for modal shift to public transport: Metro / congestion charging / free bus fares / Park & Ride not included.
5) Impacts on other streets with displaced traffic.
6) Restricted access for west side of Harold's Cross Park.
7) Combined impacts of adjacent CBCs.
8) Flawed public consultation process during COVID. Documentation too extensive and hard to properly appreciate for ordinary people. "Engaged meetings with a collective of representatives Residents Associations all in the same room at the same time would have been effective and constructive. That never happened!" "Arrangements are included that favour one residents' group at the cost of others". No consultation with bus drivers and operators.
9) Considerable number of bus stops are being removed to the disadvantage of elderly or infirm passengers.
10) Insufficient provisions for mobility impaired on buses and private vehicle alternative displaced to other routes.
11) Metro alternative given little consideration.
12) Impacts for local businesses due to traffic restrictions and lack of loading bays.
13) Very little journey time benefits for buses.
14) Stone Boat Boardwalk impacts for biodiversity and heritage.
15) References to other submissions by residents' groups.

Response to submission

Detailed responses to the issues raised in this submission are provided in Sections 2.4 and 2.5 of this report.

3.52 Ref. No.52 – Melanie Pine & Others

Submission Location – 50/51/52 Clanbrassil Street Upper

Objection to removal of on-street parking (8 reduced to 6 on west side and 3 to none on east side). No facility for deliveries on east side.

Response to submission

A detailed response to the issue raised in this submission is provided in Section 2.7 of this report.

3.53 Ref. No.53 – Metro South West Group

Submission Location – Overall Scheme

30 pages submission in favour of Metro as a better alternative to BusConnects in this part of the city.

Response to submission

A detailed response to the issue raised in this submission is provided in Section 2.4.4 of this report.

3.54 Ref. No.54 – Michael McMahon & Nathalie Peret

Submission Location – 47 Rathgar Avenue (near junction with Harold's Cross Road)

1) Bus Gate at Kenilworth Square North will divert westbound traffic onto Rathgar Avenue. EIAR Chapter 6 does not provide detailed traffic analysis of the impact.
2) Noise and Vibration impacts assessed at 5m from the road edge does not address houses closer than that (3.5m).
3) Air Quality impact has not been assessed for Rathgar Avenue with displaced traffic.
4) Drainage problems at the junction.
5) Difficult to access driveway at property with increased traffic.

Response to submission

A detailed response to the issues raised in this submission is provided in Section 2.5 of this report.

Issue No.5: This property is located 45m from the stop line at the junction and the northbound traffic queue normally extends beyond the entrance. In the Proposed Scheme the signal operations at Rathgar Avenue will be simplified a little because of the bus gate on the Kenilworth Square approach, which will allow more green signal time for traffic on Rathgar Avenue, which will carry some additional traffic diverted from Kenilworth Square. The net result should be no change in the traffic queue that sometimes extends past the house, and the ease of access to the driveway should not change.

3.55 Ref. No.55 – Michael O'Donoghue

Submission Location – 128 Kimmage Road Lower

1) Objection to the proposed bus gates and longer traffic routes / request for "white listing" local traffic to retain direct access.
2) "Raised paving" from 126 to 136 Kimmage Road Lower.
3) Road markings and signs not to impede access to laneway to rear of property. (There is a laneway just to the south of the house which appears to provide access to a garage at the rear).
4) Shelter at Bus Stop 2391 Priory Road is impractical.
5) 30 km/h speed limit is not realistic.

Response to submission

Detailed responses to the issues raised in this submission are provided in Sections 2.4 and 2.5 of this report.

3.56 Ref. No.56 – Mount Argus and Church Park Residents

Submission Location – c/o Conor O'Leary, 9 Mount Argus Crescent

1) Objection to Stone Boat cycle route. Restore the plaque that indicates that the 'Stoneboat built in 1245 AD was restored by Tiernan Builders 1990 AD',
2) River Poddle "Kingfisher" wildlife project. Risk of loss of biodiversity.
3) Alternative cycle route through Eamonn Ceannt Park.

Response to submission

Detailed responses to the issues raised in this submission are provided in Section 2.5 of this report.

3.57 Ref. No.57 – Mount Drummond District Residents' Association

Submission Location – c/o Gerry Soden, 23 Darley Street, Harold's Cross

1) Rat-run traffic from Harold's Cross Road through to O'Hara Avenue and illegal right-turn onto Grove Road to avoid right-turn ban at Robert Emmet Bridge. Also eastbound from Parnell Road turning right to go south in absence of filter at main junction. Various other movements too.
2) Yellow box at Armstrong Street junction.

Response to submission

Detailed responses to the issues raised in this submission are provided in Section 2.6 of this report.

3.58 Ref. No.58 – Orwell Park (Templeogue) Residents Association

Submission Location – c/o Betty Collard, 23 Orwell Park View

1) Bus Gates in Kimmage will increase traffic on Wellington Lane, Templeogue, which will impact the cycle route towards Kimmage.
2) F2 Bus Route start location with removal of roundabout at Spawell in Templeogue / Rathfarnham CBC Scheme? Will there be enough capacity on the service?
3) Severely restricted access by car from Templeogue to City Centre.
4) Attached the Metro South West Group submission.

Response to submission

Detailed responses to the issues raised in this submission are provided in Section 2.4 of this report.

3.59 Ref. No.59 – Our Lady's Hospice

Submission Location – Harold's Cross Road

1) Loss of land for potential expansion development.
2) Lands to the rear of the hospice are in separate ownership and not available as an alternative site for expansion.
3) Car park inconsistent with planning policies. Not suitable location for Park & Ride.
4) Inadequate assessment of impacts: access restriction beside construction compound, noise, and dust. Human Health & Population – risk of traffic delays for access to hospice.

Response to submission

Issue No.3: A detailed responses to the issue raised in this submission is provided in Section 2.6 of this report.

Responses to the other issues in this submission are provided separately in relation to CPO Objections.

3.60 Ref. No.60 – Paddy Glynn & Andrina Wafer

Submission Location – 56 Lower Kimmage Road

1) Support for the Proposed Scheme.
2) Monitor impacts.
3) Cumulative traffic data modelling must be made available.
4) Reinstate the weekday 7-10am left-turn ban at Sundrive Cross towards the north.
5) Develop school zone traffic management at Clareville Road.
6) Implement lower speed limits sooner.
7) More pedestrian crossings on Kimmage Road Lower.
8) Better quality surfacing for cyclists on Kimmage Road Lower.
9) Remove bus gate at northern end of Harold's Cross Park.
10) Objects to removal of footpath at southern end of Harold's Cross Park.
11) Objects to road widening with CPO on Harold's Cross Road and Clanbrassil Street Upper.

12) Unhappy with proposals at Robert Emmet Bridge but alternative is unclear – reinstate right-turn at Canal (to Grove Road?).
13) White listing for local traffic through bus gates.
14) E-charging points.
15) Park & Ride at city boundaries.
16) Limited proposals for landscaping and biodiversity are welcome but should be more extensive.

Response to submission

Detailed responses to most of the issues raised in this submission are provided in Sections 2.4, 2.5, 2.6 and 2.7 of this report.

Issue No.5: There is a separate programme for traffic management measures in the vicinity of schools that is funded by the NTA and implemented by the local authority, which may be used at the schools on Clareville Road.

3.61 Ref. No.61 – Paul Cashman

Submission Location – Mount Argus Square

1) Communal areas / bin store / security
2) Wildlife at Stone Boat.
3) Need for cycle route?
4) Traffic restriction at Kenilworth Park East onto Harold's Cross Road.

Response to submission

Detailed responses to some of the issues raised in this submission are provided in Sections 2.4 and 2.5 of this report.

Responses to the other issues in this submission are provided separately in relation to CPO Objections.

3.62 Ref. No.62 – Paul Ryan & Others

Submission Location – 19 Greenmount House, Greenmount Office Park, Harold's Cross

On behalf of 5 businesses at the same location.

1) Premise of scheme is flawed, and Metro is preferred.
2) Proposals will increase traffic and journey times.
3) Every journey is not into the city centre.
4) Refers to numerous traffic restrictions across 3 CBC schemes and the implications for traffic in places such as Rathmines, Rathgar, Ranelagh, Terenure, Crumlin.
5) Segregated cycle lanes not continuous along CBC.
6) Why do bus gates need to be 24/7?
7) Flawed public consultation during COVID.
8) Impacts for many businesses, including difficult delivery routes.
9) Extra traffic at schools.

Response to submission

Detailed responses to the issues raised in this submission are provided in Sections 2.4, 2.5 and 2.6 of this report.

3.63 Ref. No.63 – Peter Drennan

Submission Location – 73 Poddle Park, Kimmage.

Signed by 20 neighbours in 14 homes.

1) Objection to Bus Gate and closure of Poddle Park to through traffic.
2) Diversion of traffic onto residential streets and past schools.
3) Longer routes for residents via Stannaway Road.

4) Delay for emergency vehicles.
5) No letter to residents as “impacted properties”.

Response to submission

Detailed responses to the issues raised in this submission are provided in Section 2.5 of this report.

3.64 Ref. No.64 – Recorders Residents’ Association

Submission Location – c/o 39 Whitehall Road

1) Excluded from the consultation process – lack of compliance with the Aarhus Convention.
2) Integration of Bus routes in the proposed Dublin City Centre Transport Management Plan / Scheme name is misleading as it does not go as far as the City Centre / Bus Route changes for 15A.
3) Combined impact of 3 CBC schemes.
4) Rail alternative to other CBCs in Dublin.
5) Metro needed instead / as well.
6) Poor public awareness of BusConnects and CBC schemes.
7) Traffic restrictions on two main routes to city: Kimmage and Terenure.
8) Traffic restrictions proposed at 36 different locations across the 3 schemes will cause extensive displacements, disruption, and delays.
9) Car trips will only decline by 1.5% and some local journey times will more than double in distance and time. Implications for Climate Action Plan commitments due to increased fuel consumption.
10) Very small increases in proposed bus services.
11) Many local businesses across the Dublin 6W and Dublin 12 areas need vehicle access routes.
12) Road space is not fairly allocated by mode share.
13) Objection to increased distance between bus stops, with reference to Rathmines and Rathgar, but not Kimmage.
14) Increased carbon emissions due to BusConnects.
15) Corridors are considered in isolation.
16) Provide local school bus services.
17) Open southern bus gate to traffic at 7pm rather than 8pm.

Response to submission

Detailed responses to the issues raised in this submission are provided in Sections 2.4 and 2.5 of this report.

Issue No.2: The submission raises a specific query about the proposal in the Bus Network Redesign to replace the existing No.15 route with new route 81 which will pass along George’s Street further away from Grafton Street and Merrion Square. The new Spine Route F, which has 3 branches extending to Templeogue, Perrytown and Greenhills, will enter the city centre core at St. Stephen’s Green, which retains the same accessibility to the area between Grafton Street and Merrion Square, and will extend this from a wider part of the suburban area.

The Draft Dublin City Centre Transport Management Plan 2023 will not affect the proposed Bus Spine Route F coming from the southwest of the city to enter the core city centre at St. Stephen’s Green and to connect northwards to O’Connell Street as is illustrated in Section 2.4.5 of this response document. The proposals for the city centre area are fully compatible with the Proposed Scheme for the Kimmage Core Bus Corridor on Spine Route F. It is not correct for this submission to state that there is misleading information provided in this regard in the Proposed Scheme application. Bus Route 81 will need to be rerouted at Dame Street when College Green is pedestrianised as part of the Dublin City Centre Transport Management Plan. This service will most likely re-route westwards via Winetavern Street to the River Liffey and then proceed eastwards along Bachelor’s Walk to O’Connell Bridge, a short distance away from College Green, which will not significantly affect the accessibility to the core city centre for passengers.

3.65 Ref. No.65 – Religious Sisters of Charity

Submission Location – Access Road at Our Lady’s Hospice.

1) Traffic and access disruption during the proposed works.
2) Loss of control of access to the hospice campus.
3) Contrary to DCC and national planning policies by encouraging car use.

Response to submission

Responses to Issues No.1 and 2 in this submission are provided separately in relation to CPO Objections.

Issue No.3 is responded to in Section 2.4 and 2.5 of this report.

3.66 Ref. No.66 – Ruth Glennon & Others

Submission Location – Harold's Cross Educate Together National School, 151/153 Harold's Cross Road.

1) No provision in BusConnects scheme for “School Zone” with 30 km/h speed limit.
2) How do northbound cyclists cross the road to the school?
3) Can cycle tracks be 2m wide?
4) Footpaths at southern end of Harold’s Cross Park – very wide crossing at Shamrock Villas on south side. Safe access to bus stops on Kimmage route from school west of park. Pedestrian safety overall.
5) Refers to left turn ban at Sundrive Cross towards the north, which is not in the scheme for the reasons they highlight about extra traffic past schools in Clareville Road.
6) Request for safe pedestrian crossing at Kenilworth Park down Wilfrid Road on walking route towards these schools.

Response to submission

Detailed responses to most of the issues raised in this submission are provided in Sections 2.4 and 2.5 of this report.

Issues No.1 and 6: There is a separate programme for traffic management measures in the vicinity of schools that is funded by the NTA and implemented by the local authority, which may be used at the schools on Harold’s Cross Road. The requests for a lower speed limit at the school, and for a pedestrian crossing at Kenilworth Park / Wilfrid Road can be sought through the local authority Dublin City Council.

3.67 Ref. No.67 – Saint Martin’s Residents Association

Submission Location – c/o Karen Talbot, 13 St. Martin’s Park, Kimmage

1) Reduced hours for southern Bus Gate No.1 welcomed but not necessary at weekends. No impact assessment for the residents.
2) Bus Gate No.2 at McGowan’s should operate at same peak hours as Bus Gate No.1.
3) Bus Gate No.3 at northern end of Harold’s Cross Park: southbound operational times unclear.
4) All bus gates should operate only at peak hours 5 days a week.
5) Why have the advisory cycle lanes been removed south of Sundrive Cross in favour of parking? Proposal is unsafe. This element is not reflected in the summary descriptions in the EIAR NTS and elsewhere. Contradiction between text and drawings. Too much parking generally.
6) Omission of public realm south of Sundrive Road on western side. EIAR quantification of parking in this area questioned.
7) Combined impacts of adjoining CBC schemes unclear.
8) Additional pedestrian crossings requested on Kimmage Road Lower.

Response to submission

Detailed responses to the issues raised in this submission are provided in Sections 2.4 and 2.5 of this report.

3.68 Ref. No.68 – Sharon Sabin & Bruno Rodrigues de Oliveira

Submission Location – 1 Mount Argus Court, Harold's Cross

1) Objection to the proposed cycle route and Stone Boat Boardwalk, similar to other residents in the estate. Little benefit for cyclists.
2) Safety on local streets shared with traffic.
3) Anti-social behaviour risk.
4) Biodiversity along River Poddle.

Response to submission

Detailed responses to the issues raised in this submission are provided in Section 2.5 of this report.

3.69 Ref. No.69 – Simeon Rimmer & Sheila Hourigan

Submission Location – 4 Greenmount Avenue, Harold's Cross

1) Proposed Scheme will increase incentive for drivers to short cut through the narrow streets west of Harold's Cross Road to circumvent the proposed right-turn ban into Grove Road.
2) Request for road closure to traffic at junction of Greenmount Avenue and Greenmount Lane.

Response to submission

Detailed responses to the issues raised in this submission are provided in Section 2.6 of this report.

3.70 Ref. No.70 – Siobhán McClean

Submission Location – 282 Kimmage Road Lower

1) Supports Proposed Scheme in general, in particular the bus gates, junction improvements, public realm, cycling facilities in Harold's Cross and Clanbrassil Street.
2) Concerned about low-quality cycling facilities on Kimmage Road Lower.
3) Need for traffic calming to complement 30 km/h speed limit and enforcement cameras.
4) Bus Gate should operate 24/7, or at least be extended to cover school closure times in the afternoons.

Response to submission

Detailed responses to the issues raised in this submission are provided in Section 2.5 of this report.

3.71 Ref. No.71 – South Dublin Electrical Wholesale Ltd.

Submission Location – 84 Lower Clanbrassil Street (St. Patrick's Court).

1) Objection to proposed construction compound and suggests location at St. Vincent's Street car park instead.

Response to submission

A detailed response to the issue raised in this submission is provided in Section 2.7 of this report.

3.72 Ref. No.72 – St. Anne's Residents' Association

Submission Location – C/O Aidan Hodson, 110 Saint Annes, Kimmage

1) Traffic restrictions in the Proposed Scheme, and in combination with other CBC schemes will have a negative impact for residents of this estate.
2) Supportive of the scheme objectives but bus lanes and priority traffic signalling will suffice.

Response to submission

Issue No.1: A detailed response is provided in Section 2.4 of this report.

Issue No.2: Bus lanes cannot be provided along the northern part of Kimmage Road Lower where the houses have very small front gardens, which is why a bus gate is proposed instead. This 1km long section of the corridor is too long for signal-controlled bus priority to function effectively.

3.73 Ref. No.73 – Stannaway Road Residents

Submission Location – c/o Cathy Mooney, 73 Stannaway Road

30 households listed in support.

1) Supportive of BusConnects Scheme, but
2) Concerned about impacts of displaced traffic through their area.
3) Reduction of 50% in bus frequency when No.83 route replaced.
4) Non-compliance with existing HGV ban on Stannaway Road.
5) No measures in the Proposed Scheme to mitigate traffic impacts.
6) Appendix A6.1 -TIA-Appendix 1 - Transport Modelling Report, Table 5.2 JTC Locations, 11-5 Kimmage Road Lower/Ravensdale Park has 28,364 daily vehicle movements. Therefore, there is a significant chance that up to 10.3 million additional vehicles per year could naturally redirect onto the narrow residential roads of Stannaway Road, Cashel Road and Captains Road.
7) Scheme includes traffic restrictions east of Kimmage Road Lower (3 of the 4 mentioned are existing), but only 1 restriction to the west at Poddle Park.
8) Poddle Park cycle route duplicates the cycle lanes on Kimmage Road Lower and should remain open as a traffic route alternative to Stannaway Road.
9) Ferns Road already restricted between 7-10am, but not observed.
10) Speeding on 1.5km long straight road. Full ramps requested.
11) No mitigation for noise and vibration on Stannaway Road. Air quality concerns.
12) Delays for proposed new No.82 bus on Stannaway Road.
13) More pedestrian crossings requested on Stannaway Road.
14) Enforcement of existing traffic restrictions.
15) Road closures and/or one-way restrictions on various streets in surrounding area.

Response to submission

Detailed responses to most of the issues raised in this submission are provided in Sections 2.4 and 2.5 of this report.

Issue No.6: The traffic model results provided in the EIAR are for peak periods only on weekday mornings & evenings and these should not be extrapolated linearly to estimate the total daily traffic as this gives a greatly exaggerated daily traffic flow. The traffic impact assessment in the EIAR indicates that traffic will disperse widely across the road network well upstream of the proposed bus gate on Kimmage Road Lower and it will not simply displace westwards onto other nearby roads. Some private car journeys will be suppressed due to the modal shift to public transport and cycling as a result of the improvements in the Proposed Scheme.

Issue No.10: The existing speed cushions on Stannaway Road are more suitable on a bus route than full ramps.

Overall Summary: The projected increase in traffic on Stannaway Road and possibly other local roads adjoining is below the threshold of concern for the adoption of mitigation measures.

3.74 Ref. No.74 – Terenure/Templeogue Sustainable Community

Submission Location – c/o Brendan Heneghan, 88 Parkmore Drive, Terenure

Signed by 112 people.

1) Unhappy with consultation process during COVID.
2) Objection to all 3 bus gates, which will displace traffic onto other roads south of KCR.
3) Cycle lanes welcomed.
4) Right-turn lanes should be retained at Grand Canal and South Circular Road.
5) Combined impacts of 3 CBCs need to be considered.

Response to submission

Detailed responses to the issues raised in this submission are provided in Sections 2.4 and 2.6 of this report.

3.75 Ref. No.75 – Terenure West Residents Association

Submission Location – c/o Michele Van Valey, 10 Greenlea Park, Terenure

1) Protest against the combined fee of €100 to comment on 2 CBC schemes in the same area.
2) Proposed Scheme will greatly increase local traffic and is environmentally damaging.
3) Loss of access to Kimmage Village (by car presumably).
4) Inadequate consultation process.

Response to submission

Detailed responses to the issues raised in this submission are provided in Sections 2.4 and 2.5 of this report.

3.76 Ref. No.76 – Tesco Ireland Ltd.

Submission Location – Shop at 302-312 Kimmage Road Lower

1) Request for loading bay at premises on Kimmage Road Lower at junction with Corrib Road.
2) Suitable delivery window in bus gates operational hours including at Harold's Cross.

Response to submission

Issue No.1: Currently there is no loading bay at this shop and parking is informal with a clearway in the evening peak. In the Proposed Scheme the clearway restriction will be removed as it will no longer be required in the context of the proposed bus gate. Parking spaces will be delineated at this row of shops but there will be no formal parking controls. The business owner can apply to the local authority, Dublin City Council, for a part-time loading bay to be applied at the shop if they consider it necessary, and this would not be precluded by the Proposed Scheme.

Issue No.2: a detailed response is provided in Section 2.5 of this report, which explains that delivery vehicles can proceed southwards through the bus gate at off-peak periods when it is open to traffic.

3.77 Ref. No.77 – Estate of Joy Ordman

Submission Location – 11-13 Sundrive Road (beside car park)

1) Interaction between cyclists and pedestrians on the Poddle Cycleway with car parking and interference with access to rear of properties.
2) Access for maintenance and repair of the property and advertising hoarding.
3) Future redevelopment impacts.
4) Construction compound restrictions for access.
5) Loss of 8 public car spaces.

Response to submission

Detailed responses to the issues raised in this submission are provided in Section 2.5 of this report.

Responses to this submission are also provided separately in relation to CPO Objections.

3.78 Ref. No.78 – Mount Jerome Cemetery and Crematorium

Submission Location – Harold's Cross

1) Combined impacts of 20 bus gates along 5 bus corridors in the southwest sector restricting access routes to the cemetery. 4 of these bus gates are in the Kimmage CBC scheme.
2) Varying operational hours for different bus gates – lack of consistency.

3) Funeral cortege routes described from 9 churches with maps of the alternative routes required to avoid the bus gates.
4) Local impact of the two bus gates at Harold's Cross Park which will divert all funeral corteges along a single route at the southern end of the park.
5) Funerals take place from 10:00 to 16:00 Monday to Saturday, with peak from 11:00 to 16:00.
6) Northbound right-turn restriction at Grand Canal to Grove Road will divert exit traffic towards the southeast.
7) Risk of local congestion on the roads adjacent the cemetery.
8) Two options proposed for mitigation measures: omit the two bus gates at Harold's Cross or reduce their operational hours to peak periods similar to those for Bus Gate No.1 at Ravensdale Park.

Response to submission

Detailed responses to the issues raised in this submission are provided in Section 2.5 of this report.

Notably the diversion routes indicated in this submission are about the same length as the traditional routes. The submission does not appear to take account of the proposed removal of the right-turn ban from Rathgar Avenue onto Harold's Cross Road. The proposal to widen the road at the southern end of Harold's Cross Park is specifically intended to improve this access route towards the cemetery to properly cater for two-way traffic.

3.79 Ref. No.79 – The Harold's Cross Village Community Council

Submission Location – c/o Dr. Paula Russell, 31 Westfield Road, Harold's Cross.

Umbrella organisation for 10 residents' associations.

1) Scheme welcomed in general including the bus gates, but traffic will increase on some other roads including Kenilworth Park and Clareville Road. where traffic calming measures are requested at the schools.
2) Bike parking on Clareville Road near the junction with Kenilworth Park should be removed to provide 2 traffic lanes.
3) EIAR Chapter 4 (page 27) does not clearly describe the 24 hours restriction of southbound traffic at the most northerly bus gate in Harold's Cross. Advance warning signs will be required in both directions for this.
4) Interaction with other CBC scheme bus gates in Rathmines will increase traffic on Leinster Road.
5) Increased traffic at Kenilworth Square and Rathgar Avenue due to westbound bus gate at Harold's Cross Road junction.
6) Traffic increases of 179 to 273 vehicles per hour on various roads listed in EIAR Table 6-53. More localised traffic modelling sought in vicinity of Harold's Cross Road. Public realm improvements requested as mitigation.
7) Previous proposal for no left-turn eastbound from Sundrive Road to Kimmage Road Lower has been omitted from the Proposed Scheme – should be included.
8) Right-turn restriction onto Grove Road risks rat-running through Mount Drummond area.
9) Pedestrian crossing on Kimmage Road Lower at McGowan's pub proposed under separate planning permission.
10) Additional pedestrian crossings requested on Kimmage Road Lower in vicinity of Aideen Avenue, and Kenilworth Park / Westfield Road.
11) Removal of footpath at southern side of Harold's Cross Park. Impact for setting of park. Granite kerb stones.
12) School zones on Harold's Cross Road and Clareville Road: traffic calming measures and 30 km/h speed limits requested.
13) Supportive of cycle lanes along Harold's Cross Road, but increased traffic may impact safety. Cycle lane possibly sub-standard.
14) Bus gates will improve safety for cyclists along Kimmage Road Lower.
15) Reservations about the Stone Boat Boardwalk in context of truncated *Poddle Cycleway* r route that does not continue through Mount Argus.
16) More public realm improvements requested in Harold's Cross Village, and regrets that previous proposals are curtailed in Kimmage Village. Street furniture requested.

17) More tree planting along Harold's Cross Road between park and canal. However, they don't support the road widening into private gardens.
18) Robert Emmet Bridge: Less invasive option?
19) Ongoing monitoring and community engagement.

Response to submission

Detailed responses to the issues raised in this submission are provided in Section 2.5 of this report.

3.80 Ref. No.80 – The Passionist Community. Mount Argus

Submission Location – Mount Argus Church, Harold's Cross.

1) Proposed Scheme is broadly welcomed, but for the bus gate restrictions for traffic at Harold's Cross Park they request that they operate only at peak morning and evening periods between Monday and Friday.

Response to submission

A detailed response to the issue raised in this submission is provided in Section 2.5 of this report.

3.81 Ref. No.81 – The Wine Pair

Submission Location – St. Patrick's Court, 79-81 Clanbrassil Street Lower

1) Access to wine shop / wine bar business.
2) Visibility and signage for the business.
3) Deliveries.
4) Visual disturbance by the construction compound.
5) Security / anti-social behaviour.
6) Loss of green space.
7) Loss of business and risk of seeking to relocate the premises.

Response to submission

Detailed responses to the issues raised in this submission are provided in Section 2.7 of this report.

Responses to this submission are also provided separately in relation to CPO Objections.

3.82 Ref. No.82 – Thom's Pharmacy and Opticians

Submission Location – c/o Fergal O'Dwyer, 151 Kimmage Road Lower

1) Access restrictions for customers and deliveries.

Response to submission

A detailed response to the issue raised in this submission is provided in Section 2.5 of this report.

3.83 Ref. No.83 – Transport Infrastructure Ireland

Submission Location – Overall Scheme

1) Support for the Proposed Scheme.
2) There are no interactions with national roads or tram lines.

Response to submission

This submission is noted.

3.84 Ref. No.84 – Yvonne McKenna

Submission Location – 134 Corrib Road, Terenure

1) Objection to bus gate that will restrict access towards Bushy Park for football coaching.
2) Road will become a rat-run.

Response to submission

Issue No.1: A detailed response to the issue raised in this submission is provided in Section 2.5 of this report. Travel by car to Bushy Park during the evening peak will require an alternative route which would be 1.5km longer via Terenure Road North.

Issue No.2: It is to avoid the risk of through traffic diverting through Corrib Road that it is proposed to close the link at Derravaragh Road,