

Eimear Reilly

From: Housing Manager DAU <Manager.DAU@npws.gov.ie>
Sent: Thursday 3 November 2022 15:48
To: SIDS
Cc: Sinead OBrien (Housing)
Subject: HA29N.313892
Attachments: HA29N.313892 SID-DF-2022-011.pdf

A chara,

Please find attached observations on the above referral.

Le meas,

Joanne

Joanne Lyons
Higher Executive Officer

Aonad na nIarratas ar Fhorbairt
Development Applications Unit
Oifigí an Rialtais
Government Offices
Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90
Newtown Road, Wexford, County Wexford, Y35 AP90

**An Roinn Tithíochta,
Rialtais Áitiúil agus Oidhreacht
Department of Housing,
Local Government and Heritage**



Your Ref: HA29N.313892
Our Ref: **SID-DF-2022-011**
(Please quote in all related correspondence)

3 November 2022

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Via email to sids@pleanala.ie

Re: Notification under the Planning and Development Act, 2000, as amended.

Proposed Strategic Infrastructure Development (SID): Application for a Road development consisting of the construction of the Blanchardstown to City Centre Core Bus Corridor Scheme (the "proposed scheme") together with all ancillary and consequential works associated therewith for the purpose of facilitating public transport on an overall length of approx. 10.9km which commences at Junction 3 (Blanchardstown/Mulhuddart) southbound off-slip from the N3 and proceeds along the R121 Blanchardstown Road South into the Blanchardstown Shopping Centre. From a new terminus to the north-west of Blanchardstown Shopping Centre the Scheme is routed onto the N3 Navan Road via the Snugborough Road junction and follows the N3 and Navan Road as far as the junction with the Old Cabra Road, then routed along the Old Cabra Road, Prussia Street, Manor Street and Stoneybatter to the junction with King Street North. It then routes via Blackhall Place as far as the junction with Ellis Quay.

A chara

I refer to correspondence received in connection with the above.

Outlined below are heritage-related observations/recommendations of the Department under the stated heading(s).

Archaeology

It is noted that the Environmental Impact Assessment Report (EIAR) submitted as part of the planning application incorporates a desk-based Archaeological Impact Assessment which was carried out in relation to the proposed development by Courtney Deery Heritage Consultancy Ltd (EIAR Chapter 15; date May 2022). The Department of Housing, Local



Government and Heritage has reviewed the EIAR and is broadly in agreement with the findings in relation to Archaeology and Cultural Heritage as set out therein.

Therefore, the Department advises that the following should be included as a condition of any grant of permission.

Archaeological Requirements:

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 May 2022) shall be implemented in full, except as may otherwise be required in order to comply with the conditions of this Order.
2. The Construction Environmental Management Plan (CEMP) shall clearly identify and highlight the location of all archaeological and cultural heritage constraints located in proximity to the proposed works—as identified in Chapter 15 of the EIAR or 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 works.
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 Department 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.

Reason:

To ensure the continued preservation (either *in situ* or by record) of places, caves, sites, features or other objects of archaeological interest.

Nature Conservation

Having considered the documentation supporting this application, it is noted that to facilitate the proposed road development it is intended to remove 1.46 ha of hedgerows and 0.67 ha of treelines. While the incorporation of trees and shrubs in the landscaping of the proposed development should ensure there will be no significant long-term loss of biodiversity as a result of this vegetation clearance, the felling of trees and removal of hedges during the bird breeding season could lead to the destruction of nests, eggs and nestlings, and should be avoided.



It is also noted that the Environmental Impact Assessment Report (EIAR) submitted in support of this application identifies the possibility that pollutants mobilised into surface water runoff from the proposed development, including from construction compounds, during its construction phase could have adverse effects on aquatic biota occurring in nearby water bodies such as the River Tolka and the Royal Canal, a proposed Natural Heritage Area (pNHA). Mitigation measures are consequently set out in the Surface Water Management Plan (SWMP) incorporated in the Construction Environmental Management Plan (CEMP) supporting this application to prevent such pollutants being mobilised from the development and reaching these water bodies. These measures include the employment of silt curtains, berms and infiltration trenches, the storage of hydrocarbons and other chemicals and refuelling of machinery in bunded areas and safe handling of cementitious materials, and if diligently implemented should prevent the pollution surface water bodies and adverse effects on aquatic flora and fauna.

Recommendations

In light of the above the Department recommends that any planning permission granted in response to the present application should be subject to the following conditions:

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

Reason:

To avoid the destruction of bird nests, eggs and nestlings.

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

Reason:

To avoid the pollution of surface water bodies including rivers and the Royal Canal in the vicinity of the proposed development resulting in adverse effects on aquatic flora and fauna.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at manager.dau@npws.gov.ie, or to the following address:

The Manager
Development Applications Unit (DAU)
Government Offices
Newtown Road
Wexford
Y35 AP90



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Lyons

Joanne Lyons
Higher Executive Officer
Development Applications Unit
Administration