

**Written Submission from Dublin City
Council Chief Executive
to An Bord Pleanala**

**in relation to
the National Transport Authority's**

**BusConnects Dublin - Blanchardstown to City Centre Core Bus Corridor Scheme
An Bord Pleanala Ref. HA29N.313892**

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Blanchardstown to City Centre Core Bus Corridor Scheme

The National Transport Authority (NTA) has applied under Section 51(2) of the Roads Act 1993 (as amended) to An Bord Pleanála for approval in relation to a proposed road development consisting of the construction of the **Blanchardstown to City Centre Core Bus Corridor Scheme** which has an overall length of approximately 10.9km. The proposed route will commence at Junction 3 (Blanchardstown/Mulhuddart) southbound of –slip from the N3, then along the R121, N3, and Navan Road as far as the Junction with Old Cabra Road. From there the route proceeds along Prussia St, and through Stoneybatter to Blackhall place, from it joins the North Quays

1.1 Scope of Report

In accordance with Section 51 (3)(b) of the Roads Act 1993 (as amended), this submission sets out the views of Dublin City Council (a prescribed body), on the Blanchardstown to City Centre Core Bus Corridor Scheme and the potential effects of the proposed development on the environment and the proper planning and sustainable development of the area.

In early 2019, as directed by the Chief Executive of Dublin City Council, a multi-disciplinary corporate team was established to provide a liaison role for the NTA BusConnects Project. The purpose of this team/office is to effectively manage the communications and act as the primary conduit for information exchange between Dublin City Council and the National Transportation Authority in relation to the BusConnects Programme.

This dedicated BusConnects Liaison Office has facilitated the exchange of information and engagement with other departments and sections within the City Council regarding the design of the bus corridors including the proposed scheme.

2.0 Description of the Proposed Development

This proposed scheme is one of 12 stand-alone Core Bus Corridor (CBC) Schemes to be delivered under the BusConnects Dublin - Core Bus Corridors (CBC) Infrastructure Works. The CBC Infrastructure Works, once completed, will deliver the radial core bus corridors identified in the Transport Strategy for the Greater Dublin Area 2016 – 2035.

The proposed route is one of 12 arterial routes into the city centre, which are as follows:

- Clongriffin to City Centre Core Bus Corridor Scheme
- Swords to City Centre Core Bus Corridor Scheme
- Ballymun/Finglas to City Centre Core Bus Corridor Scheme
- **Blanchardstown to City Centre Core Bus Corridor Scheme**
- Lucan to City Centre Core Bus Corridor Scheme
- Liffey Valley to City Centre Core Bus Corridor Scheme
- Tallaght/Clondalkin to City Centre Core Bus Corridor Scheme
- Kimmage to City Centre Core Bus Corridor Scheme
- Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme

- Bray to City Centre Core Bus Corridor Scheme
- Belfield/Blackrock to City Centre Core Bus Corridor Scheme.

The proposed route is divided into five sections as follows:

- Section 1: N3 Blanchardstown Junction to Snugborough Road
- Section 2: Snugborough Road to N3 / M50 Junction
- Section 3: N3 / M50 Junction to Navan Road / Ashtown Road Junction
- Section 4: Navan Road / Ashtown Road junction to Navan Road / Old Cabra Road Junction
- Section 5: Navan Road / Old Cabra Road junction to Ellis Quay.

Of these, Sections 4 and 5 are situated in the Dublin City Council administrative area. The proposed route begins at Blanchardstown Centre which is in the functional area of Fingal County Council. The route travels southeast along the N3/Navan Road and enters the Dublin City Council area at the roundabout on the junction with Ashtown Road and Ashtown Gate Road, at the Halfway House public house, with works proposed to this junction, to give bus priority and enhanced facilities for pedestrians and cyclists. The entire route to the east of the junction is within the city boundary, extending for c.4.5km along Navan Road, Prussia Street, Manor Street and Blackhall Place to the junction with Ellis Quay. The route serves the areas of Ashtown, Navan Road, Blackhorse Avenue, Cabra, Grangegorman TUD campus, Prussia Street, Stoneybatter/Manor Street and Blackhall Place

The route begins in an area which is largely suburban, consisting mainly of low rise housing and associated amenities, including Navan Road parish church and Cabra Garda Station, in addition to a number of institutional lands providing educational and health facilities (including St. Vincent's Centre, Navan Road Parish, Dominican lands). Following the junction with New Cabra Road/Maple Shopping Centre, the route travels southeast along the arterial route comprising Old Cabra Road and Prussia Street, to Manor Street, Stoneybatter and the city centre. This area includes a mix of uses (housing, apartments, retail and commercial uses) many of which front directly onto the public footpath. The area is undergoing a transition, with a number of brownfield sites, including the Park Shopping Centre, being the subject of proposals for redevelopment at a higher density. Stoneybatter is an urban village serving artisan type two-storey houses to the west, three-to five-storey apartment developments adjacent to the village and the Grangegorman TUD campus to the east. The area closest to the quays is a conservation area which includes the Incorporated Law Society at Blackhall Place.

From Ashtown Road junction to the Navan Road / Old Cabra Road junction (also referred to as Ratoath Road junction), the proposal provides for a bus lane and general traffic lane in each direction, with one-way cycle tracks alongside the proposed inbound and outbound bus lanes. In order to accommodate these, permanent and temporary land take will be required from a number of properties along this section, the majority of which are residential. Boundary treatment will generally match existing. Enhanced cyclist and pedestrian facilities will be provided at each junction along this section. Junction layouts will be amended to include the removal of the right turn filter lane from Navan Road (westbound) into Kempton Avenue and Ashtown Grove, although the right turn movement is permitted. The proposals include four proposed bus stops with nine existing bus stops to be retained and seven existing bus stops to be removed along this section of the route.

In the section from Navan Road/Old Cabra Road to Ellis Quay, the proposal limits the use of Old Cabra Road to local access traffic, buses, taxis and cyclists as follows:

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

On Old Cabra Road, the extent of the outbound bus lane will be limited to an c.110m section just south of the Navan Road junction. Glenbeigh Road / Old Cabra Road junction will become a signal-controlled junction, with the introduction of toucan crossings on the Old Cabra Road. The proposal provides two one-way cycle tracks on each side of Old Cabra Road, while traffic lanes, bicycle infrastructure and footpaths will be accommodated within the existing road bridge width over the Heuston Station / Connolly Station railway line. To provide an alternative route for general traffic to and from the City Centre (along Cabra Road, North Circular Road, Infirmary Road and Conyngham Road), the junction at Cabra Road (Dalymount)/North Circular Road will be altered to allow right turns from Cabra Road (Dalymount) to North Circular Road and left turns from North Circular Road onto Cabra Road (Dalymount).

On Prussia Street, between North Circular Road and the entrance to the Park Shopping Centre, the proposal provides the following:

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

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

At the junction of Manor Street / Prussia Street with Aughrim Street, the proposal provides the following:

- In the northbound direction, a Bus Gate will be located on Prussia Street just north of Aughrim Street junction, such that all northbound general traffic will be required to turn left onto Aughrim Street;

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

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

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

On Manor Street and Stoneybatter, the proposal provides for two general traffic lanes and a cycle track in both directions to the junction with Brunswick Street North. The proposal provides for protected parking bays on both sides of the road, and for two loading bays. In the northbound direction on Blackhall Place, the proposal provides a bus lane and a single general traffic lane as far as the junction with North King Street. Northbound general traffic wishing to progress onto Manor Street will turn right onto North King Street which will remain one-way eastbound, and then turn left onto George's Lane to travel westbound along Brunswick Street North. The proposal will include signal controlled priority for northbound buses at the Stoneybatter / Brunswick Street North junction, and a cycle track in each direction along Brunswick Street North.

The proposed scheme will allow for general traffic exiting Arbour Hill to turn right only at the Stoneybatter junction. General traffic into Arbour Hill will be from Manor Street direction or Brunswick Street North only. A southbound general traffic lane will be provided along Stoneybatter between Brunswick Street North and King Street North, with general traffic being required to turn left into King Street North as a result of a southbound bus gate at Blackhall Place/King Street North junction. Bus services will continue travelling straight ahead along a southbound bus lane on Blackhall Place, as is currently the case. A loading bay will be provided along the northern side of King Street North.

On Blackhall Place between Blackhall Street and Arran Quay, the carriageway arrangement will consist of a bus lane and general traffic lane in each direction. On Blackhall Street, the road layout will be revised to include one lane for general traffic, a two-way cycle track, and angled parking. George's Lane will have one northbound general traffic lane, with proposed new signal controls at the junction of Grangegorman Street Lower and Brunswick Street North. Westbound general traffic from the City Centre on the eastern section of King Street North (east of George's Lane) will be restricted to left turns only, into Queen Street. The proposal provides two southbound general traffic lanes on Queen Street. From North King Street, the layout will reduce to one southbound general traffic lane from

Blackhall Street to Ellis Quay / Arran Quay. A two-way cycle track is proposed on the eastern side of Queen Street from King Street North to Ellis Quay / Arran Quay.

In Section 5 five new bus stops are proposed, with six existing bus stops to be retained and six existing bus stops to be removed. Four existing bus stops at the Cabra Road (Dalymount) /North Circular Road junction will be retained. Traffic management measures such as one-way streets and/or turn bans will be required to minimise traffic impacts on side roads due to diverted traffic (which may occur due to the priority given on the Proposed Scheme to pedestrians, cyclists and buses). A short one-way northbound section will be required on Annamoe Road at its junction with Annamoe Terrace and on Charleville Road at its junction with North Circular Road. No access is proposed from Phibsborough Road onto Phibsborough and Monck Place, along with the introduction of right turn bans onto Phibsborough Road. A short one-way southbound section is also proposed at the northern end of Cowper Street, with Aughrim Place becoming one-way southbound. There is also a short one-way westbound section at the western end of Swilly Road.

The NTA is a statutory non-commercial body, which operates under the aegis of the Department of Transport. The NTA was established on foot of the Dublin Transport Authority Act 2008 (as amended) (the '2008 Act'). In the case of the Proposed Scheme, the functions of the NTA include undertaking the design and planning process, seeking (and obtaining) all development consents including related compulsory acquisition approvals from An Bord Pleanála and constructing the Proposed Scheme (if approved).

The EIAR notes that the aim of the proposed scheme is to provide improved 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 outcomes achieved from delivering the Proposed Scheme, as set out in the EIAR, will be:

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

2.1 Relevant Planning History

Significant planning applications along and adjacent to the route include:

Nos. 23-28 Prussia Street

SHD0033/21: Permission refused by An Bord Pleanála for a Strategic Housing Development at 23-28 Prussia Street, at the junction of Prussia Street and St. Joseph's Road, and bounded by no. 29 Prussia Street [a protected structure] to the north, no. 22 Prussia Street to the south & TU Dublin, Grangegorman Campus to the east; development to comprise demolition of existing structures on site, including no. 23 Prussia Street (a two-storey terraced house with commercial use on the ground floor) and the remnants of the facades of no. 24 & 25 Prussia Street, works to the historic

Grangegorman boundary wall (a protected structure), including removal of existing concrete coping on top of the existing stone wall and removal of a section of the wall to facilitate the provision of the primary pedestrian and cycle access route from TUD Grangegorman Campus to Prussia Street (Prussia Street gateway), in accordance with the Grangegorman SDZ Plan and construction of a residential development of 162 'build to rent' (BTR) apartments (107 x one-bedroomed, 53 x two-bedroomed and two x three-bedroomed), in one block, ranging in height from three storeys over basement (four-storey) fronting Prussia Street to 13 storeys over basement (14-storey) adjoining TUD Grangegorman Campus, with a café and associated facilities, and including construction of a basement with storage, plant rooms, refuse store, 22 car parking spaces, 4 motorcycle spaces and 336 bicycle spaces.

Nos. 29b, 30 and 31 Prussia Street

SHD0025/21/ABP 312102-21: Permission granted by An Bord Pleanála for a strategic housing development consisting of demolition of existing industrial sheds/workshops (c.1,605m²) and construction of a student accommodation development with a total of 336 bedspaces in 232 bedrooms (18 studio units, 21 x eight-bedroom, one x seven-bedroom, five x six-bedroom, one x five-bedroomed and one no. four-bedroomed unit) in three blocks ranging in height from five storeys fronting Prussia Street to seven storeys over lower ground floor level towards the rear boundary adjoining the TU Dublin Grangegorman Campus; Block A to comprise a five-storey building fronting Prussia Street, Block B a six-storey over basement block and block C a seven-storey over lower ground floor level block; student amenities and management facilities provided at basement, ground and lower ground floor levels with a bicycle store (120 spaces) at lower ground floor level of block C and 16 spaces at ground floor level in front of block A, external communal open space areas at lower ground floor, ground floor and upper ground floor level and at roof level of block B;

The development also includes vehicular access to the site from Prussia Street for restricted student drop-off/pick up, servicing and emergency vehicles, creation of a new internal street providing pedestrian and cycle access between Prussia Street and TUD Grangegorman Campus through a 3.85m wide opening in the Grangegorman boundary wall to the east (a protected structure); works to the Grangegorman boundary wall also include removal of the existing concrete coping on top of the existing stone wall and provision of new signage at this location.

Park Shopping Centre & Nos. 42-45 Prussia Street

SHD0007/21: Permission granted by An Bord Pleanála for a strategic housing development comprising:

- (1) Demolition of existing Park Shopping Centre and nos. 42-45 Prussia Street, and creation of portal openings in the former boundary wall (a protected structure);
- (2) Construction of a new mixed use district centre, student residential housing and Build-to-Rent (BTR) housing development in two buildings separated by a new pedestrian and bicycle street connecting Prussia Street with the emerging Grangegorman SDZ campus; buildings to range in height from three to five storeys on

Prussia Street to six storeys (South building) and 8-storeys (North Building) towards to GDA campus.

(3) District Centre development accommodating:

- Part-licensed supermarket, 11 no. retail/non-retail service units and 2 no. licensed café/restaurant units at ground floor;
- Two vehicular entrances from Prussia Street to provide access for deliveries and services (South entrance) and to provide access to undercroft parking and van deliveries (North entrance);
- Standing areas for deliveries and waste collection in designated service yards (South Building) and for car parking for 111 no. cars, light van deliveries and bicycle parking (North Building);
- Associated ancillary facilities, landscaping and boundary treatments including acoustic attenuation measures where required.

(4) Student residential accommodation overhead the District Centre accommodating eleven student houses comprising 143 apartments (including 28 studios), with a total of 584 bedspaces (556 bedrooms) and associated balconies and amenities;

(5) Build-to-rent residential accommodation overhead the supermarket with lift and stair access from Prussia Street, comprising 29 apartments with balconies;

(6) New street to connect to the Grangegorman SDZ campus via a portal connection through a former boundary wall;

(7) Development includes art display along the new street, landscaping, boundary treatments, signage, plant and substations, and all associated site works and services.

2.2 Policy Context

2.2.1 Regional Level

Regional Spatial and Economic Strategy for the Eastern and Midlands Regional Assembly (RSES) 2019-2031.

The principal aim of the RSES is to support the implementation of Project Ireland 2040 by providing a long-term strategic planning and economic framework for the development of the Region. The RSES is underpinned by three key principles, i.e. placemaking, climate action and sustainable economic opportunity and growth. Sixteen Regional Strategic Outcomes (RSOs) are set out which are broadly aligned with the National Strategic Outcomes of the NPF. 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.

2.2.2. Citywide Level

2.2.2.1 Dublin City Development Plan 2016-2022

The Dublin City Development Plan 2016-2022 recognises the need for an efficient, integrated, and coherent transport network as a critical component of the Development Plan's Core Strategy. The City Council supports the improvement of public transport and cycling which will allow for higher density development, thereby creating a more sustainable interaction between land-use and transport. Chapter 8 of the City Development Plan 'Movement and Transport' sets out the Council's policies and objectives which are relevant to BusConnects.

Relevant policies include:

MT2 *Whilst having regard to the necessity for private car usage and the economic benefit to the city centre retail core as well as the city and national economy, to continue to promote modal shift from private car use towards increased use of more sustainable forms of transport such as cycling, walking and public transport, and to co-operate with the NTA, Transport Infrastructure Ireland (TII) and other transport agencies in progressing an integrated set of transport objectives. Initiatives contained in the government's 'Smarter Travel' document and in the NTA's draft transport strategy are key elements of this approach.*

MT3 *To support and facilitate the development of an integrated public transport network with efficient interchange between transport modes, serving the existing and future needs of the city in association with relevant transport providers, agencies and stakeholders.*

MT4 *To promote and facilitate the provision of Metro, all heavy elements of the DART Expansion Programme including DART Underground (rail interconnector), the electrification of existing lines, the expansion of Luas, and improvements to the bus network in order to achieve strategic transport objectives.*

MT5 *To work with the relevant transport providers, agencies and stakeholders to facilitate the integration of active travel (walking, cycling etc.) with public transport, thereby making it easier for people to access and use the public transport system.*

MT7 *To improve the city's environment for walking and cycling through the implementation of improvements to thoroughfares and junctions and also through the development of new and safe routes, including the provision of foot and cycle bridges. Routes within the network will be planned in conjunction with green infrastructure objectives and on foot of (inter alia) the NTA's Cycle Network Plan for the Greater Dublin Area, and the National Cycle Manual, having regard to policy GI5 and objective GIO18.*

MT11 *To continue to promote improved permeability for both cyclists and pedestrians in existing urban areas in line with the National Transport Authority's document 'Permeability – a best practice guide'. Also, to carry out a permeability and accessibility study of appropriate areas in the vicinity of all Luas, rail and BRT routes and stations, in co-operation with Transport Infrastructure Ireland and the National Transport Authority.*

MT13 *To promote best practice mobility management and travel planning to balance car use to capacity and provide for necessary mobility via sustainable transport modes.*

MT20 To increase capacity of public transport, cycling and walking, where required, in order to achieve sustainable transportation policy objectives. Any works undertaken will include as an objective enhanced provision for safety, public transportation, cyclists and pedestrians, and will be subject to environmental and conservation considerations.

MT23 To improve facilities and encourage relevant transport agencies/transport providers to provide for the needs of people with mobility impairment and/or disabilities including the elderly and parents with children.

The proposed route is shown on development plan map K as part of the indicative Blanchardstown to UCD BRT (Bus Rapid Transit) route. BusConnects has replaced BRT as the NTA's proposal for an integrated network of bus routes throughout the Greater Dublin area.

2.2.2.1.1 Strategic Development and Regeneration Areas

The proposed route runs adjacent to two Strategic Development and Regeneration Areas (SDRAs) – SDRA8 (Grangegorman/Broadstone) and SDRA11 (Stoneybatter, Manor Street and O'Deveney Gardens). SDRA16 (Liberties and Newmarket Square) is also situated in close proximity to the route, on the opposite side of the river Liffey, while SDRA7 (Heuston and Environs) is just west of this.

SDRA8 (Grangegorman/Broadstone)

The proposed route is c.70m from the Grangegorman Strategic Development Zone (SDZ) which comprises the former HSE lands at Grangegorman (formerly St. Brendan's Psychiatric Hospital). In April 2002, the Government made the decision that a new consolidated DIT campus would be developed at Grangegorman, complemented with new healthcare facilities, and integrated into the city fabric. The planning scheme for Grangegorman was approved by An Bord Pleanála in July 2012 as a strategic development zone (SDZ) in accordance with Section 169 of the Planning and Development Act 2000 (as amended). This significant redevelopment project (c.29 hectares) is managed by the Grangegorman Development Agency (GDA), whose role is to deliver a modern campus for the Dublin Institute of Technology, provide the Health Service Executive with upgraded primary health and social care facilities and to provide other facilities including a new school and sports grounds for the benefit of the community. Overall objectives for creating connections, urban form, campus nodes, landscaping etc. are set out in detail in the SDZ, implementation of which is ongoing.

Guiding principles for the SDRA are captured by the overall vision for Grangegorman set out in the SDZ planning scheme. These include:

- Creation of a vibrant, high-quality and legible urban quarter, with a clear sense of place
- Sustainability is a core requirement and the quarter must be both responsive to its current context and development needs, and adaptable to its future context and development needs.

SDRA 11 (Stoneybatter, Manor Street and O'Deveney Gardens)

The SDRA is situated c.330m west of the proposed route. In order to progress the development of the O'Deveney Gardens housing regeneration site, Dublin City Council prioritises the compilation, development and implementation of a statutory based local area plan for the Stoneybatter district.

The boundary for the statutory based LAP will be North Circular Road to the north, Infirmary Road to the west, Montpelier Hill to the south and the boundary of the Grangegorman SDZ to the east.

Key guiding principles for the development of the SDRA include the following:

- Development of attractive new streetscapes with mixed typologies of high-quality accommodation, a high-quality public realm and active street frontages will be promoted to complement the architectural legacy of streetscapes adjoining this location, including the special streetscapes of the North Circular Road, Infirmary Road and Oxmantown areas.

2.2.2.1.2 Area Specific Plans

This section references the following plans currently active within the area of the proposed route.

2.2.2.1.2.1 Grangegorman SDZ Planning Scheme

The planning scheme for the SDZ is intended to guide its development as a new campus for the Technical University of Dublin (TUD) while retaining some health service uses and providing new connections between the wider area and the Grangegorman lands, which were originally secured by a high stone boundary wall. Key structuring principles set out in the planning scheme include the provision of a new green route, known as the Serpentine Walk, through the campus and a new pedestrian route, St. Brendan's Way, extending west from Broadstone Plaza through the lands and terminating at Prussia Street.

It is noted that the proposal also impacts on the Phibsborough Centre Architectural Conservation Area (ACA) with provision for bus stops and amendments to junctions.

2.2.2.2 Draft Dublin City Development Plan 2022-2028

Although not the statutory planning context for the assessment of development proposals, the draft City Development Plan is scheduled to be fully adopted by December 2022. It sets out the policy context for the next six years to 2028. A significant number of policies have relevance for the delivery of transport infrastructure in the city.

The core strategy set out in the draft plan is to develop a low carbon, sustainable and climate resilient capital city, where people will choose to live, work, experience city living, invest and socialise. The vision for the city is that, within the next ten years, it will have an established international reputation as a city region that is one of Europe's most sustainable, dynamic and resourceful. It is envisaged that the city will be beautiful, compact city, with a distinct character and a vibrant culture, and with a diverse, green and innovation-based economy. The city will be a socially inclusive city of urban neighbourhoods based on the principle of the 15-minute city, which allows people's daily requirements to be reached within 15 minutes by foot, bicycle or public transport, and is therefore compact. All development will be connected by exemplary public transport, cycling and walking systems.

Chapter 8 sets out the planning authority's policies in relation to sustainable movement and transport. The policy approach promotes the integration of land use and transportation, improved public transport and active travel infrastructure such as walking and cycling. The policy promotes an increased shift towards sustainable modes of travel.

Relevant policies include the following:

SC1 Consolidation of the Inner City: *To consolidate and enhance the inner city, promote compact growth and maximise opportunities provided by existing and proposed public transport by linking the critical mass of existing and emerging communities such as Docklands, Heuston Quarter, Grangegorman, Stoneybatter, Smithfield, the Liberties and the North East Inner City with each other, and to other regeneration areas.*

SC8 Development of the Inner Suburbs: *To support the development of the inner suburbs and outer city in accordance with the strategic development areas and corridors set out under the Dublin Metropolitan Area Strategic Plan and fully maximise opportunities for intensification of infill, brownfield and underutilised land where it aligns with existing and pipeline public transport infrastructure.*

QHSN10 15 Minute City: *To promote the concept of the 15-minute city which provides for liveable, sustainable urban neighbourhoods and villages throughout the city that deliver healthy placemaking, high quality housing and well-designed, safe and inclusive public spaces served by local services, amenities and sustainable modes of transport.*

CEE12 Transition to a Low Carbon, Climate Resilient City Economy: *To support the transition to a low carbon, climate resilient city economy, as part of, and in tandem with, increased climate action mitigation and adaptation measures.*

SMT1 Modal Shift and Compact Growth: *To continue to promote modal shift from private car use towards increased use of more sustainable forms of transport such as active mobility and public transport, and to work with the National Transport Authority (NTA), Transport Infrastructure Ireland (TII) and other transport agencies in progressing an integrated set of transport objectives to achieve compact growth.*

SMT3 Integrated Transport Network: *To support and promote the sustainability principles set out in National and Regional documents to ensure the creation of an integrated transport network that services the needs of communities and businesses of Dublin City and the region.*

SMT4 Integration of Public Transport Services and Development: *To support and encourage intensification and mixed-use development along public transport corridors and to ensure the integration of high quality permeability links and public realm in tandem with the delivery of public transport services, to create attractive, liveable and high quality urban places.*

SMT8 Public Realm Enhancements: *To support public realm enhancements that contribute to placemaking and liveability and which prioritise pedestrians in accordance with Dublin City Council's Public Realm Strategy ('Your City – Your Space'), the Public Realm Masterplan for the City Core (The Heart of the City), the Grafton Street Quarter Public Realm Plan and forthcoming public realm plans such as those for the Parnell Square Cultural Quarter Development and the City Markets Area.*

SMT11 Pedestrians and Public Realm: *To enhance the attractiveness and liveability of the City through the continued reallocation of space to pedestrians and public realm.*

SMT13 City Centre Road Space: *To manage City Centre road-space to best address the needs of pedestrians and cyclists, public transport, shared modes and the private car, in particular, where there are intersections between DART, LUAS and Metrolink and with the existing and proposed bus network.*

SMT18 Integration of Active Travel with Public Transport: *To work with the relevant transport providers, agencies and stakeholders to facilitate the integration of active travel (walking/cycling etc.) with public transport, ensuring ease of access for all.*

SMT20 Key Sustainable Transport Projects: *To support the delivery of key sustainable transport projects including Metrolink, Bus Connects, DART+ and LUAS expansion programme so as to provide an integrated public transport network with efficient interchange between transport modes, serving the existing and future needs of the city and region.*

2.2.2.2.1 Strategic Development and Regeneration Area (SDRA)s

The draft plan contains updated policies in relation to the designated SDRAs and includes some new ones. This includes overarching principles for the SDRAs in addition to a series of guiding principles for each SDRA.

In relation to access and permeability, it is an overarching principle that development proposals should ensure adequate permeability and connectivity to surrounding neighbourhoods and public transport infrastructure through the provision of high quality, accessible public realm and high quality walking and cycling infrastructure. Access and layout should accord with the principles of DMURS.

SDRA8 (Grangegorman/Broadstone)

The draft development plan sets out policies for SDRA8 (Grangegorman/Broadstone). It is noted that overall objectives for creating connections, urban form, campus nodes, landscaping etc. are set out in detail in the SDZ Planning Scheme. Implementation of the planning scheme is ongoing. The redevelopment potential of the Dublin Bus lands at Broadstone, which currently form a transport hub, are also recognised.

Other SDRAs

It is noted that SDRA13 (Markets), SDRA15 (Liberties/Newmarket) and SDRA7 (Heuston) are all situated within close proximity of the proposed route.

2.3 Departmental Reports

The following Dublin City Council Departments and Divisions submitted a report and their response has been incorporated into the Planning Authority's Report:

- ☐ Environment and Transportation Department – including comments from Traffic, Roads, Public Lighting and Environmental Protection Divisions
- ☐ Archaeology Division

- ☐ Conservation Section
- ☐ City Architects Division

Additional comments from the various departments etc. are provided in the appendix.

2.4 Planning Assessment:

2.4.1 Planning Policy

In terms of Regional Policy, as set out in Section 2.2.1, the proposed scheme is supported by the RSES. BusConnects (of which the Proposed Scheme is a part) is identified as a key infrastructure project which will support the regional growth strategy for the Eastern and Midlands Region including the Dublin MASP area. It is considered 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. The RSES not only seeks an improved and enhanced bus network but also places cycling at the core of its transport objectives.

At citywide planning level, the Dublin City Development Plan 2016-2022 sets out policies and objectives required to achieve its Core Strategy. The proposal has been considered with regard to this Core Strategy and the policies and objectives of the current Dublin City Development Plan and in particular the dual aspirations of delivering necessary transport infrastructure to facilitate compact growth while also protecting Natura designated sites.

2.4.2 Environmental Impact Assessment Report (EIAR)

A comprehensive EIAR is provided with the application documents examining the project under all relevant impacts and finds generally that the development would not adversely impact on existing environmental amenities. As An Bord Pleanála is the competent authority with regard to the acceptability or otherwise of the EIAR, it is not the role of Dublin City Council to comment on the acceptability or not of the EIAR and its findings but the content points generally to the development having negligible impact on the existing environment.

2.4.3 Natura 2000

The Habitats Directive and the Birds Directive list habitats and species which are considered to be important and in need of protection. These sites are referred to as European Sites. Sites designated for wild birds are termed Special Protection Areas (SPAs) and sites designated for natural habitat types or other species are termed Special Areas of Conservation (SACs). The network of European sites is referred to as Natura 2000.

A screening report has been prepared by the applicant which concludes that, having regard to the nature of the project and its potential relationship with all European sites within the zone of influence, and their conservation objectives, it is the professional opinion of the authors of this report that the application for approval for the proposed scheme does require a Stage Two Appropriate Assessment in respect of the 17 European sites (five SACs and 12 SPAs) and consequently the preparation of a Natura Impact Statement (NIS).

The Natura Impact Statement prepared by the applicant identifies the following SPA and SAC designated areas in the vicinity of the proposed development, with the approximate distance from the site:

Special Areas of Conservation (SAC)

Rye Water Valley/Carton SAC	6.65km
North Dublin Bay SAC	6.03km
South Dublin Bay SAC	4.62km
Baldoyle Bay SAC	10.14km
Malahide Estuary SAC	12.2 km
Howth Head SAC	11.72km
Rockabill to Dalkey Island SAC	12.19km
Lambay Island SAC	21.28km
Glenasmole Valley SAC	11.33km
Wicklow Mountains SAC	11.97km

Special Protection Areas (SPAs)

North Bull Island SPA	6.02km
South Dublin Bay & River Tolka Estuary SPA	2.89km
Baldoyle Bay SPA	10.56km
Malahide Estuary SPA	12.2 km
Wicklow Mountains SPA	13.66km
Ireland's Eye SPA	14.29km
Rogerstown Estuary SPA	16.54km
Howth Head Coast SPA	14.46km
Dalkey Islands SPA	14.45km
Lambay Island SPA	21.22km
Skerries Islands SPA	26.16km
Rockabill SPA	27.6 km
<u>The Murrrough SPA</u>	<u>31.13km</u>

The NIS notes that the proposed scheme does not overlap with any European sites, although it is hydrologically connected to Dublin Bay via the river Tolka, Liffey Estuary Upper and Royal Canal and via existing drainage infrastructure. A table of potential impacts is set out and mitigation measures are identified.

Dublin City Council considers that the submitted Natura Impact Statement 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. 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 Natura Impact Statement objectively concludes that the development will not adversely affect (either directly or indirectly) the integrity of any European site, either alone or in combination with other plans or projects and that there is no reasonable scientific doubt in relation to this conclusion.

2.4.4 Zoning and other designations

In the current Dublin City Development Plan (2016-22) the area along the proposed route includes lands with the following zoning objectives: Z1 (residential), Z2 (residential conservation areas), Z3 (neighbourhood centre), Z4 (district centres), Z5 (city centre), Z6 (employment/enterprise), Z9 (open space) and Z15 (institutional and community).

The outer section of the proposed route consists mainly of Z1-zoned lands with associated public open space and some institutional lands, Navan Road district centre and a small neighbourhood centre on the corner of Skreen Road. As the route travels towards the city centre there is a mix of zonings, including Z6 lands on the corner of North Circular Road and on Prussia Street, a small Z3-zoned area at Hanlon's Corner, Z4-zoned lands including the Park Shopping Centre on Prussia Street, Stoneybatter village which consists of Z3-zoned lands and Z5-lands further south, and residential lands zoned Z1 and Z2. The Grangegorman SDRA lands are a short distance east of the site.

For the most part, the proposed scheme is situated on lands within the existing public road and pedestrian area where there is no specific zoning objective. The proposed route passes through a zone of archaeological interest on Manor Street/Stoneybatter.

The proposal also includes works within the architectural conservation area (ACA) of Phibsborough Village). Blackhall Place, which is a red hatched conservation area, is situated at the southern end of the proposed route. The impact on the conservation areas is assessed in the report by the Conservation Division.

Appendix 21 of the development plan defines a 'public service installation' as '*a building, or part thereof, a roadway or land used for the provision of public services. Public services include all service installations necessary for electricity, gas, telephone, radio, telecommunications, television, data transmission, drainage, including wastewater treatment plants and other statutory undertakers: bring centres, green waste composting centres, public libraries, public lavatories, public telephone boxes, bus shelters, etc. but does not include incinerators/waste to energy plants. The offices of such undertakers and companies involved in service installations are not included in this definition.*'

As defined above, the secondary elements associated with the proposed scheme, such as bus shelters, stops and real time information signage fall within the definition of public service installation.

Overall, is considered that the proposals would be compatible and consistent with the zoning objectives for the area.

2.4.5 Impact on amenity

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. There

will be a degree of disruption in terms of traffic management during construction but thereafter there is unlikely to be adverse impact on existing amenities. There will be a need for sharing of space including kerbside space, which will need to be managed to ensure that there is no undue adverse impact on the ability of residents and visitors to access local services on foot or on the ability to achieve the '15-minute city'. There will also be some impacts on residential amenity as a result of loss of areas of front garden and boundary. These must be balanced against the overall benefits of the proposed development. Once complete, the proposed scheme will create attractive, functional and accessible places for people alongside the core bus and cycle facilities which will enhance the amenities of the area.

2.4.6 Strategic Observation from the Forward Planning Department of Dublin City Council

The City Council supports the improvement of public transport and cycling which will allow for higher density development, thereby creating a more sustainable interaction between land-use and transport. Chapter 8 of the current Dublin City Development Plan (2016-22) 'Movement and Transport' sets out the Council's policies and objectives which are relevant to Bus Connects, which include, *inter alia*, policies in relation to sustainable transportation, modal shift and supporting and facilitating the development of an integrated public transport network, with efficient interchange between transport modes, serving the existing and future needs of the city. It is noted that there are no area specific plans relating to the area.

The provisions of the new draft development plan are noted, in relation to consolidation of the inner city, development of the inner suburbs, transition to a low carbon, climate resilient city economy, modal shift and compact growth, support for an integrated public transport network integration of public transport and development, public realm enhancements, enhancement of the attractiveness and liveability of the city through continued reallocation of space to pedestrians and public realm, management of the city centre road space and support for key sustainable transport projects including BusConnects. It is noted that the site is in the vicinity of SDRA8 (Grangegorman/Broadstone) in the new draft plan.

Attention is also drawn to sheet 21 of 40 which includes planned works to the southern end of Ashtown Road, where a Junction Upgrade is sought. In this regard, it may be of relevance that, under a current Railway Order application, Irish Rail has proposed works close by to the north (see works plan WP009 within 'Book 1; Railway Works Plan'). It is also possible that proposals under the railway order may be relevant to sheet 20 of the proposed bus route, given the very close proximity of the proposals.

2.4.7 Environment and Transportation Department

The Environment and Transportation Department has provided comments under the headings of General Comments, Traffic Division, Roads Division, Public Lighting Division and Environmental Protection Division. These comments are as set out in italics below.

2.4.7.1 General Comments

The Department is generally supportive of the improvements to bus and cycling infrastructure proposed in the overall context of encouraging a shift to sustainable mobility. In this regard the

proposal generally aligns with the policies expressed in the Dublin City current and draft Development Plans.

Dublin City Council is obligated to consider the Proposed Scheme in the context of the vision and range of policies set out in the current and draft development plans with a view to safeguarding the city as a place in which to live, work, visit and do business.

Dublin City Council recognises that the bus is the most important mode of public transport in Dublin and this is best illustrated by the fact that, in 2019, almost 160 million journeys were made by bus in the Dublin Region, representing 65% of all public transport trips in the Dublin area. In addition, the DCC/NTA cordon count in 2019 showed that the bus was the single highest mode of transport crossing the canal, 30% of all trips, and the bus accounted for over half of all public transport trips into the city centre.

The commitment by the NTA within the BusConnects project to increase the level of priority afforded to the bus service is very much welcomed. The introduction of, for the most part, separated and segregated cycle ways is again welcomed as providing the opportunities:

- To provide a better and safer cycling environment for all ages and abilities
- To help the bus maintain a steady speed and so achieve its journey times and even headways by removing bicycles from potentially being a source of delay in the bus lane.

2.4.7.2 Traffic Division

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. It is essential on all BusConnects corridors to ensure that the bus service is given priority and that 'The proposed scheme to operate on a managed headway basis'. Therefore, the corridor cannot be operated in isolation and must in fact be a managed corridor such that the DCC traffic control system is constantly managing requests for priority and has the necessary information to determine what level of priority is appropriate in order to maintain an even headway on the corridor.

The DCC centralised traffic control system has for a number of years been linked to the bus automatic vehicle location system via a bespoke software called DPTIM and this link provides details of the bus location, its journey pattern and if the bus is ahead or behind schedule. For the BusConnects project this system is being upgraded to link to the next Generation Automatic vehicle location system which will allow finer grain information to be transmitted to the DCC system for dynamic management of the corridor.

The modelling work which was carried out on the corridor using Vissim attempted to mimic the real life operation of a full corridor management system using an adaptive traffic control system and allows for a firm basis for how the corridor can be evaluated and to determine its benefits. In practice DCC will utilise its adaptive traffic control system SCATS to undertake the required traffic management on the corridor to enable the public transport corridor to perform as per the requirements. Because of the use of a real world system which has multiple inputs from the Bus AVL system, cycle and pedestrian detection as well as vehicle actuated sensors, the signals will be running multiple sets of timings across

the day rather than a fixed set of timings and the use of this technology will allow improved corridor operation.

The design of this scheme is complex, particularly from the Navan Road Junction to Blackhall Place with insufficient space to cater for all modes and so necessitating complex traffic re- routing. In addition the scheme does remove some existing parking and loading bays in order to provide the require levels of priority for buses and the provision of safe cycle facilities. The loss of this parking and loading, while appropriate in the delivery of this high quality public transport scheme, nevertheless does mean that deliveries to local businesses especially will need to be addressed in the day to day management of the scheme.

The use of Bus Gates along portions of this route to compensate for the lack of continuous bus lanes by using dynamic traffic management will be challenging and require careful installation and monitoring to ensure the scheme benefits are being achieved. In addition the changes in traffic flow in the Aughrim Street Prussia Street and surrounding areas will require real time management and monitoring. The enhanced data garnered by DCC from the next Generation AVL system and the next generation Bus priority system currently being specified will play a key role in how the corridor is dynamically managed to ensure that the bus journey times and headways are met. This digital infrastructure along with the proposed civil infrastructure are both required for the corridor to meet its objectives.

It is noted that the design of the route allows for good connectivity for walking and cycling via Queen Street, linking to the Grange Gorman campus and allowing for integrating with the cycle network in the city and this is to be welcomed.

Project Delivery Mechanism

This project is being undertaken by the NTA in the role of public transport regulator exercising the right to provide improvements to public transport infrastructure directly via Section 51 of the 1993 Roads Act. The NTA is taking over the role of the Road Authority for the purposes of obtaining planning permission for the corridors and the subsequent construction of the corridors will be undertaken directly by the NTA via their contractors.

Thus the planning and construction of these corridors takes more the form of the Light Rail process than for example the early Quality Bus Corridors, which were all developed and put in place directly by DCC.

2.4.7.3 Roads Division

This section of the Environment & Transportation report on the Blanchardstown Bus Connects Scheme has been prepared by the Roads Department. It includes technical input from Roads Design, Roads Construction, Roads Maintenance and Transportation Planning Sections, the remit of which covers design and construction phases through to maintenance and operational phases of the scheme as well as wider policy and planning considerations. The Roads Department is generally supportive of the scheme and its intention to improve bus and cycling provision. Having reviewed the application documentation, the department would like to highlight some matters which, with further consideration, could improve the scheme. The comments set out in the first instance are generally

applicable to all the schemes. The Roads Department has in response to these matters developed a set of recommended standard conditions for attachment to all permissions granted which, once complied with, will facilitate engagement and agreement between DCC and the NTA at detailed design and construction stages. Scheme specific comments are also highlighted below for An Bord Pleanála's consideration.

In general terms, Bus Connects proposes substantial improvements to bus and cycling infrastructure, with provision of additional signalised crossings for pedestrians along the routes. The schemes, including the Blanchardstown scheme, could be improved by making greater provision for pedestrians by ensuring sufficient and appropriate footpath widths based on pedestrian flows (with an absolute minimum 2m width) and also by ensuring pedestrian priority throughout the routes. There are recurring situations throughout the schemes where user priority is unclear, for example at bus stops and where cycle routes cross footpaths. Grade or physical separation between cycling facilities and footpaths is recommended and running cycle tracks through footpaths and pedestrianised zones should be avoided. Ensuring pedestrian priority is important particularly in the context of people with accessibility issues including visual impairments. Pedestrians, in accordance with all levels of policy, should be ensured priority through signage and other appropriate measures. A condition is recommended in this regard.

The scheme objective is clearly set out, which is to enhance the capacity and potential of the public transport system by improving bus speeds, reliability and punctuality through the provision of bus lanes and other measures to provide priority to bus movement over general traffic movements. This of necessity, alongside the provision of cycle lanes, means a reallocation of some kerbside space to buses and cyclists from existing kerbside activity including parking and loading and servicing. The extent of loss of parking and loading bays has been quantified, but there may be still some concern regarding the adequacy of alternative provision. More information and clarity in this regard during the detailed design stage would provide comfort that the scheme will continue to support the operation of local businesses. In addition to loading facilities, on street parking is also affected including at commercial units. A recommendation/condition regarding loading and parking is attached.

Regarding the current scheme before An Bord Pleanála, it is noted that temporary land acquisition is proposed for a substantial number of properties along the route including private driveways, private landings and institutional lands such as schools and churches. Access and egress arrangements are temporarily altered or removed for these properties. However, it is not clear how this impact is being mitigated and how safe alternative access/egress and parking arrangements will be provided for property owners and users. It is also noted that permanent changes to some site accesses are proposed as part of the scheme and reference is made to width of relocated/altered accesses as being between 5-5.8m. An Bord Pleanála's attention is drawn to the maximum driveway width of 3.6m identified in the current Dublin City Development Plan. This is further reduced to 3m in the draft Development Plan 2022-2028 which will come into effect in December 2022.

With regard to the Prussia Street section of the current scheme, it is noted that no signalised pedestrian crossings are provided along a substantial length of the street. The nature and character of Prussia Street will be significantly altered by planning permissions granted along both sides of the street providing for over 1,200 bed spaces in the form of both student accommodation and Build to

Rent residential units. This results in substantial increases in residential and student populations along Prussia Street which generate significant additional levels of footfall along the street and therefore new desire lines across the street including to the TUD Grangegorman campus via existing and proposed connections from Prussia Street. In this context, it is recommended that the scheme include additional signalised pedestrian crossings along Prussia Street.

The current scheme includes alterations to an existing area of public realm and a car park adjacent to a public house and shops at Manor Street. The car park also appears to accommodate loading and servicing for local businesses. The scheme removes the parking and loading area and proposes a new public realm layout. It is considered that some parking and loading could be retained at this location in support of local services and businesses without impacting on the bus gate and corridor. Furthermore, the public realm design response requires more detailed consideration in consultation with DCC's multi-disciplinary public realm team.

2.4.7.4 Public Lighting Department Comments and Recommended Conditions

Public Lighting has provided a number of recommendations – see appendix.

2.4.7.5 Environmental Protection Division

Dublin City Development Plan 2016-2022, Chapter 9 identifies the need for Sustainable Environmental Infrastructure as part of any development in the city. The criteria listed in Chapter 9 are linked to the other major environmental themes within the Plan specifically in relation to Climate Change, Green Infrastructure, Open Space and Recreation, and Sustainable communities. The principles of Sustainable Drainage Systems (SuDS) should be integrated with all other environmental aspects of a project, using best practice solutions. DCC requires this softer engineered approach to be used to manage surface water at source as it is a greener, more environmentally effective approach for managing stormwater. These requirements will be further strengthened in the Dublin City Development Plan 2022-2028.

The key requirements for this development from a surface water/drainage/flood management perspective are outlined as follows:

This development must comply with the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0 (available from www.dublincity.ie Forms and Downloads). In particular:

- Continuous Kerbs incorporating drainage, as outlined in Figure 2, Page 3 in Appendix K Drainage Design Basis Document, are not accepted by DCC Drainage Planning, Policy and Development.
- Enclosed drainage channels such as slot drains or “ACO” drains are not accepted by Drainage Planning, Policy and Development.
- The hybrid gully outlined in Section 1.1.3, Page 4 in the BusConnects - Road run-off collection gullies Technical Paper is not accepted by DCC Drainage Planning, Policy and Development. The use of narrow profile gullies as previously agreed is welcome.

The development shall incorporate Sustainable Drainage Systems in the management of surface water, providing an integrated approach with the landscaping proposals. Full details of these shall be agreed in writing with DCC Drainage Planning, Policy and Development Control prior to commencement of construction. Soft landscaping should be considered before hard landscaping.

The SuDS design should refer to the new Dublin City Council Sustainable Drainage Design and Evaluation Guide published in 2021.

The detailed drainage design shall be agreed in writing with DCC Drainage Planning, Policy and Development prior to commencement. It shall be in accordance with the requirements set out in the Greater Dublin Regional Code of Practice for Drainage Works. Surveys on the location and condition of surface water infrastructure sewers, both pre and post development, shall be carried out by the developer and any damage rectified. Any diversions shall be agreed in writing, prior to commencement, with Drainage Planning, Policy and Development Control. Details on proposed connection locations to the surface water network and flow discharges shall also be agreed.

The NTA shall confirm in writing to Drainage Planning, Policy and Development Control that the development has been designed such that the risk of flooding to the development has been reduced as far as is reasonably practicable, and that the proposals do not increase the risk of flooding to any adjacent or nearby area. The effect of climate change on flooding, +20% rainfall and 0.5m sea level rise should be allowed for in calculations.

Any changes in ground profile shall be modelled to demonstrate no increase in flood risk and to reduce it where reasonably possible.

Pluvial flood risk shall be assessed at all locations along the route (not just where sections are 150m long). It should not be increased anywhere and should be reduced where possible. No pluvial flooding for 30 year flood scenario is welcome but needs to be connected to new SuDS/GI features rather than our already overloaded network.

The NTA must demonstrate that this development passes the three stages of the SFRA Justification Test, particularly for tidal and fluvial flooding.

New compensatory SuDS measures should be close to any green areas lost. In particular, the loss of existing large trees will increase pluvial flood risk unless replaced with equal size or replacement SuDS/GI features again close to where they are lost.

The following more detailed comments shall also be addressed:

- While an increase in permeable areas in some sections is welcome, consideration should still be given to SuDS treatment of runoff whenever possible. Nature based solutions should be used throughout rather than oversized pipes.
- To avoid multiple connections to combined sewers a separate surface water network should be constructed. A justification as to why this approach is taken in some areas and not others should be provided.
- The overflow pipes should be shown on the drawings.
- The design should be checked around CH A9000 as there seems to be a discrepancy with DCC records and details shown, DCC CL: 10.97m and IL: 7.78m. Cover Levels and Inverts should be checked to ensure design is viable throughout.
- There are errors in the drawings, which need to be corrected. One such example is at CH A7250 and shows the discharge point as the Ringsend main lift pump house but the

design shows connection to the surface water network which flows through the Phoenix Park. Discharge point and Tie in point should be clarified throughout as they seem to be confused in this submission.

Water Framework Directive

The Water Framework Directive (2000/60/EC), (WFD) pertains to a number of identified waterbodies contiguous to the proposed Blanchardstown to City Centre CBC scheme. Dublin City Council is obliged to achieve a water quality status of 'good' or better with all priority waterbodies by December 2027.

To support our achievement of our legislative obligations, all surface water that discharges from the curtilages of the Blanchardstown to City Centre CBC proposal into existing or proposed waterbodies shall be intercepted and treated using nature based solutions, in order to satisfy the requirements of the WFD to achieve 'Good' status of these waterbodies.

In addition, to reduce the strain on existing and proposed drainage infrastructure, no surface water being discharged within the curtilage of this project should discharge into any combined sewer systems. We require all drainage within the curtilage of this project to be segregated, and infrastructure for discharging surface water into existing surface water sewers should be implemented.

Note:

Good Status includes both good ecological and chemical status as determined by the Environmental Protection Agency against an established set of assessment criteria. The latest status indicators may be viewed at www.catchments.ie.

2.4.8 Archaeology Section Observations

The proposed bus corridor runs within the Zone of Archaeological Constraint for recorded monument DU018-020 (Historic City) from Prussia Street until the southern termination of the scheme at Ellis Quay. DU018-020 (Historic City) is listed on the Record of Monuments and Places (RMP) and is subject to statutory protection under Section 12 of the National Monuments (Amendment) Act 1994. The site is also located within the Zone of Archaeological Interest in the Dublin City Development 2016-22. This report will comment only on the sections of the proposed route within the DCC area (Sheets 3 – 6). The relevant sections of the proposed bus corridor comprise:

- Navan Road/Ashtown Road Junction to Navan Road/Old Cabra Road Junction
- Navan Road/Old Cabra Road Junction to Ellis Quay

The above RMP sites are listed as Sites of Archaeological Interest in the Dublin City Development 2016-22. It is the policy of the Dublin City Development Plan 2016-22 (Section 11.1.5.15 CHC9) to protect and preserve monuments: 1) to protect archaeological material *in situ* by ensuring that only minimal impact on archaeological layers is allowed, by way of the re-use of buildings, light buildings, foundation design or the omission of basements in the Zones of Archaeological Interest and (2) that where preservation *in situ* is not feasible, sites of archaeological interest shall be subject to 'preservation by record' according to best practice in advance of redevelopment.

EIAR and mitigation

Chapter 15 of the EIAR focuses on the archaeological and cultural heritage implications of the proposed scheme. This was written by Lisa Courtney and Dr Claire Crowley of Courtney Deery Ltd and provides a comprehensive desk study of published and unpublished documentary and cartographic sources, supported by a field study. The archaeology report states the following:

There are eight archaeological heritage features on the Records of Monuments and Places/Sites and Monuments Record (SMR – non-statutory), one Zone of Archaeological Potential as well as non-designated archaeological sites that have the potential to be impacted within the Proposed Scheme. Bus Connects will enter the zone of the Historic City of Dublin (RMP DU018-020) at Prussia Street, and will travel through the area of Oxmantown Green, associated with the Viking settlement of Oxmantown, as well as through part of the 17th century urban expansion of North Dublin.

The EIAR shows that recorded Monuments and archaeological sites within the Historic City include an 18th to 19th century house (RMP DU018-020251), the Blue Coat School and Hospital (RMP DU018-020177; DU018-020178), a church (RMP DU018-020414), a 17th century glassworks (SMR DU018-286), a Bowling Green (RMP DU018-020310) and a bridge (RMP DU018-020312)). Non designated archaeological sites include a small graveyard at St Joseph's on the Navan Road and a cluster of houses depicted on historic maps located at the junction of the R147 Navan Road with the Old Cabra Road. Further, two 19th-century tramlines listed on the Dublin City Industrial Heritage Record (DCIHR Refs: 18_07_045 & 18-06-009) may be impacted by groundworks associated with the scheme. These comprise two routes which ran from Phoenix Park to O'Connell Street and from Stanley Street to Queen Street and along Arran Quay. The route corridor terminates near the site of the former Gravel Walk Slip, which is included in the DCIHR (18_11_214).

The report demonstrates that there is the potential for the discovery of previously unknown below-ground archaeological features, materials and deposits along the proposed scheme including the subsurface remains of early dwellings and cellars. Section 15.4.1 of the EIAR states that the main potential impacts on archaeology and cultural heritage as a result of construction works could arise from the following interventions:

- Pavement construction, repairs, and reconstruction works;
- Road resurfacing works;
- Any excavations of soil, including landscaping works; and
- Any ground disturbance for utility works.

The EIAR proposes that all subsurface archaeological and cultural heritage issues will be resolved by mitigation during the pre-Construction Phase or Construction Phase, in advance of the Operational Phase, through one or more of the following:

- Preservation by record (archaeological excavation);
- Preservation in situ;
- Preservation by design; and
- Archaeological monitoring.

Section 15.5 of the EIAR addresses the proposed archaeological mitigation measures that will be applied should archaeological features be encountered during works.

- The NTA will procure the services of a suitably-qualified archaeologist as part of its Employer's Representative team administering and monitoring the works.
- The appointed contractor will make provision for archaeological monitoring to be carried out under licence to the DHLGH and the NMI, and will ensure the full recognition of, and the proper excavation and recording of, all archaeological soils, features, finds and deposits which may be disturbed below the ground surface.
- All archaeological issues will be resolved to the satisfaction of the DHLGH and the NMI. The appointed contractor will ensure that the archaeologist will have the authority to inspect all excavation to formation level for the proposed works and to temporarily halt the excavation work, if and as necessary, having conferred with the NTA. They will be given the authority to ensure the temporary protection of any features of archaeological importance identified having conferred with the NTA.
- The archaeologist will be afforded sufficient time and resources to record and remove any such features identified in accordance with the licensing requirements agreed.

Archaeological excavation ensures that the removal of any archaeological soils, features, finds and deposits is systematically and accurately recorded, drawn and photographed, providing a paper and digital archive and adding to the archaeological knowledge of a specified area (i.e. preservation by record). As archaeological excavation involves the removal of the archaeological soils, features, finds and deposits, following this mitigation measure there is no further impact on the archaeological heritage. In the case of cellars, coal cellars and/or basements, the appointed contractor in consultation with the archaeologist engaged by them will make provision for a geodetic survey and recording of each individual structure which will be subject to impact. This survey and recording will be carried out in advance of any construction works on the cellar, coal cellar and/or basement. 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.

The EIAR proposes that features of a cultural heritage interest that are required to be removed on a temporary basis or for a short-term period, will be removed under archaeological supervision and in accordance with a method statement in consultation with the NTA and the relevant statutory authorities. This will protect the heritage asset from any adverse impacts and ensure that it is stored safely at an agreed location prior to its reinstatement. Mitigation measures for upstanding industrial heritage sites, historic street furniture, and cultural heritage sites of architectural interest are provided in Chapter 16 (Architectural Heritage)

The report concurs with the findings of the archaeological assessment in the EIAR and supports the mitigation measures proposed in it. Recommendations, including the appointment of a project archaeologist to oversee the delivery of the archaeological strategy, are set out in the report (see Appendix).

2.4.9 Conservation Assessment

The conservation assessment has been carried out in the context of the Dublin City Development Plan 2016 – 2022, other key policy documents and best conservation practice. It is submitted that the following policies and provisions in particular should be taken into account in the consideration of all proposed routes and their impacts on the architectural and built heritage of the city:

Dublin City Development Plan 2016 – 2022 (Volume 1)

Chapter 11 – Built Heritage and Culture, 11.1.1, *“The built heritage contributes significantly to the city’s identity, to the collective memory of its communities and to the richness and diversity of its urban fabric. The street pattern, local architectural features, the form of buildings and spaces, civic buildings within set pieces of urban design, the unique Georgian squares and streets, together with the larger areas of Victorian and Edwardian architecture north and south of the canals, and the industrial buildings of traditional enterprises, all contribute to the city’s character, identity and authenticity, and together form a key social, cultural and economic asset for the development of the city”.*

Section 11.1.2 *“....Heritage in all its components contributes to a high quality of life for everyone”.*

It is the Policy of Dublin City Council:

CHC2 *“To ensure that the special interest of Protected Structures is protected. Development will conserve and enhance Protected Structures and their curtilage and will:d) Not cause harm to the curtilage of the structure;”* Walls, railings, gates, gardens and planting within the curtilage of a Protected Structure are considered to be part of, and contribute to the architectural character and setting of the Protected Structure.

Section 11.1.5.3 states *“.....The curtilage of a Protected Structure is often an essential part of the structure’s special interest. In certain circumstances, the curtilage may comprise a clearly defined garden or grounds, which may have been laid out to complement the design or function.....the retention of landscaping and trees (in good condition) which contribute to the special interest of the structure shall also be required”.*

It is the Policy of Dublin City Council:

CHC3: *“To identify and protect exceptional buildings of the late 20th century; to categorise, priorities and, where appropriate, add to the RPS.”* Thus, consideration must be given to any 20th century buildings of quality that may be added to the RPS, and would be affected by the proposed works.

Section 11.1.5.4 addresses Architectural Conservation Areas and Conservation Areas and states: *“The Planning and Development Act, 2000 (as amended), section 81(1), requires that a development plan shall include an objective to: Preserve the character of a place, area, group of structures or townscape.....Architectural Conservation Areas and Conservation Areas have been designated in recognition of their special interest or unique historic and architectural character and important contribution to the heritage of the city.....all of these areas require special care in terms of development proposals and works by the private and public sector alike, which affect structures both protected and unprotected in these areas”.*

It is the Policy of Dublin City Council:

CHC4: *"To protect the special interest and character of all Dublin's Conservation Areas (including Architectural Conservation Areas, Conservation Areas and areas zoned Z2 and Z8 in the Dublin City Council Development Plan 2016-2022). Development within or affecting a conservation area must contribute positively to its character and distinctiveness, and take opportunities to protect and enhance the character and appearance of the area and its setting, wherever possible...."*

Development will not:

1. *Harm buildings, spaces, original street patterns or other features, which contribute positively to the special interest of the Conservation Area...*
4. *Harm the setting of a Conservation Area"*

Section 11.1.5.6 states *"All new development must have regard to the local context and distinctiveness and the contribution to the local scene of buildings, landmarks, views, open spaces and other features of architectural, historic or topographical interest."*

It is the policy of Dublin City Council:

CHC7: *"To protect and manage trees in Architectural Conservation Areas".*

16.10.18 - Parking in the Curtilage of Protected Structures and in Conservation Areas - that *"every reasonable effort is made to protect the integrity of the Protected Structure and/or conservation area."*

16.10.19 - Non-Residential and Commuter Off-Street Parking in the Curtilage of Protected Structures and in Conservation Areas – that *"its impact on the integrity, setting, character and amenities of the Protected Structure and/or conservation area will be critically assessed."*

Volume 2 Appendix 7 - Stone Setts to be Retained, Restored or Introduced

The proposed works should take into account any areas that contain historic stone setts noted in Appendix 7 of the current Development Plan, and take all practicable measures to avoid loss of or damage to historic materials and features. The Applicant should comply with the requirements of the *Architectural Heritage Protection Guidelines for Planning Authorities 2011 – 14.4.1* and the Department of Arts, Heritage and the Gaeltacht (now the Department of Housing, Local Government and Heritage) Advice Series *Paving – The conservation of historic ground surfaces* and best conservation practice.

Volume 2 Appendix 8 - Paved Areas and Streets with Granite Kerbing

The proposed works should take into account any areas that contain historic paving/kerbing noted in Appendix 8 of the current Development Plan, and take all practicable measures to avoid loss of or damage to historic materials and features. The Applicant should comply with the requirements of the *Architectural Heritage Protection Guidelines for Planning Authorities 2011 – 14.4.1* and the Department of Arts, Heritage and the Gaeltacht (now the Department of Housing, Local Government and Heritage) Advice Series *Paving – The conservation of historic ground surfaces* and best conservation practice.

Dublin City Tree Strategy 2016 – 2020

The Conservation Section would like to highlight that trees contribute significantly to the streetscape and character of the historic areas of the city, including the character and setting of Protected Structures, Architectural Conservation Areas and 'red-hatched' Conservation Areas, as provided in the Dublin City Development Plan 2016-2022.

As noted in the Dublin City Tree Strategy 2016 – 2020, "Dublin City's identity is expressed in a pattern of tree lined streets and open spaces. Trees form an integral part of the urban fabric of Dublin City whether they are in public or private ownership.... Trees contribute to urban design and can help define spaces.... They can also create areas of particular urban character and ambience as the use of the term Dublin's leafy suburbs suggests and they provide a verdant frame for our historic buildings".

Section 3.6.1 "Private trees whether in gardens, residential or business premises make a significant contribution to the visual amenity of Dublin City and provide an important habitat for wildlife. They may act as landmarks, identify a particular location, provide a foil to the urban townscape and impart a sense of character to the area....."

We recommend that all mature and historic trees across the Bus Connects proposal and particular in close proximity to Protected Structures and within ACAs, Conservation Areas and areas zoned Z2 and Z8 in the Dublin City Council Development Plan 2016-2022 are retained and protected as far as practically possible. Where there is an unavoidable loss of historic trees, the NTA shall ensure that these are replaced with new semi mature trees to the satisfaction of DCC.

Architectural Heritage Protection Guidelines for Planning Authorities (2011)

Consideration of proposals affecting boundary features

13.4.3 "Proposals to remove or alter boundary features could adversely affect the character of the Protected Structure and the designed landscape around it.... such alterations can have a detrimental effect on the character of a Protected Structure and on the character of an ACA".

13.4.4 "....the cumulative effect on the character of the street or area of a series of incremental changes may not be acceptable".

p.197 "...Gardens are generally a combination of built features and planting. Regardless of its size, a garden can make an important contribution to the character and setting of a Protected Structure...."

14.4.1 Street Furniture and Paving

"An item of street furniture may be protected by being included in the RPS in its own right where it is special or rare; as part of the curtilage of a Protected Structure; or as part of an ACA. Such items could include lamp standards, seats and benches, bollards, railings, street signs, iron signposts, free standing or wall mounted post boxes, telephone kiosks, horse troughs, water pumps, drinking fountains, jostle stones, milestones, paving, kerbstones, cobbles and setts, pavement lights, coal hole covers, weighbridges, statues and other monuments."

Department of Culture, Heritage and the Gaeltacht – Technical Advice Series

The Technical Advice Documents on *Paving – the conservation of historic ground surfaces* and *Iron – the repair of wrought and cast ironwork* should be used to guide any interventions to historic boundary railings and paving arising from the proposed works.

Assessment

The potential impact of the proposed development on the architectural heritage of this route and on the following categories in particular, has been assessed:

- Protected Structures and Proposed Protected Structures and their setting
- Buildings and other structures (post boxes/milestones etc.) included in the National Inventory of Architectural Heritage (NIAH)
- Structures included in the Dublin City Industrial Heritage Record Survey (DCIHR)
- Other unprotected structures that contribute positively to the architectural heritage and character of streetscapes
- Architectural Conservation Areas (ACAs) and Conservation Areas
- Lands zoned Z2 in the Dublin City Council development Plan 2016-2022, which aims to *"protect and / or improve the amenities of residential conservation areas"*
- Lands zoned Z8 in the Dublin City Council Development Plan 2016-2022, which aims *"to protect the existing architectural and civic design character, and to allow only for limited expansion consistent with the conservation objective"*
- Historic Paving and Kerbing.

General Response

The comprehensive assessment on architectural heritage, streetscape and the urban environment submitted as part of the EIAR and the proposed mitigation measures across the scheme is generally welcomed.

Chapter 17 – Landscape-Townscape Visual Assessment is also welcomed. This states that *'Proposals for the treatment of the public realm within the streetscape impacted by the Proposed Scheme will have regard to the existing character of the street or location, to emerging policies, objectives and proposals for the public realm and to opportunities for mitigation of impact on the public realm and the streetscape. Proposals will have regard to historic details and features, to the quality of existing and proposed materials, to the reduction of clutter, ease of legibility, and management and maintenance requirements'*.

It is noted that some elements of architectural heritage have not been correctly represented, or have been incorrectly labelled in the documents and on the supporting mapping. These are set out in detail in the Conservation report.

The photomontages provided are also considered to be limited and not to sufficiently assess the effects of the proposed route on views and visual amenity in relation to a number of sensitive historic areas to include Old Cabra Road, Prussia Street, Stoneybatter and Blackhall Place. In particular the Conservation Section is concerned that no photomontages have been provided for Blackhall Place, which would have been expected given the proximity of the former Blue Coat School to the proposed scheme, as this is a structure with a National rating, which has been identified in Appendix A16.2 as being of 'High' sensitivity. The paucity of the coverage through the historic inner city area is disappointing and as a result the impact on the built heritage is difficult to assess.

Key impacts

Having regard to the information submitted the following are considered by the Conservation Section to be the key impacts of the Blanchardstown to City Centre route in relation to architectural heritage:

- Protected Structures and their setting
 - a) It is considered that the proposed new cantilever signal pole and alterations to the public realm to the northwest of the historic entrance and gate lodge of St Vincent's Home on the Navan Road (RPS 5808), to include the loss of grass verges and semi-mature trees will impact negatively on the setting of the Protected Structure. The proposal to install a cantilever signal pole in this sensitive location is regrettable and a further review of signal requirements should be carried out with a view to obviating the need for this.
The existing westbound bus-stop and shelter, also at St. Vincent's Home, will be retained in their current position. These are considered to currently detract from the setting of the protected structure; however, no details are provided in relation to any proposed upgrading. As a shelter already exists in this location, consideration should be given to relocating the bus stop/shelter further east to the front of the adjacent modern Aura De Paul swimming pool.
 - b) 74 Manor Street (RPS Ref. 4586) (Map Sheet 33) has the potential to be negatively impacted by the provision of new signage in close proximity to it.
 - c) Adverse impact of the proposed cycleway through the stone setts on the curtilage of the entranceway leading to the two-storey stone lodge and arched entrance to the Sisters of Charity Convent (RPS 4872) (Map Sheet 33); although later, these setts make a positive contribution to the setting of the Protected Structure.
 - d) No details provided in relation to upgrading the existing northbound bus stop and shelter immediately outside the boundary wall of the Law Society grounds on Blackhall Place, a significant complex which includes the former Blue Coat school and is on both the RMP (DU018-202177) and RPS (765) and has been rated of 'National' importance by the NIAH. The existing shelter detracts from the setting of the protected structure in this highly sensitive location, and any change could further adversely affect the site, its setting and/or vistas of it. As a shelter already exists in this location, consideration should be given to relocating the bus stop/shelter to in front of the adjacent modern building on the corner of Blackhall Place and Hendrick Place
 - e) Changes to the urban realm at St Peter's Catholic Church (RPS 1730), North Circular Road (Sheet 39), which is a prominent landmark situated in the Phibsborough Centre Architectural Conservation Area (ACA), may impact on the character of the ACA particularly with regard to the proposed provision of new bus shelters to existing bus stops. The provision of bus shelters in close proximity to the Protected Structure would negatively impact on its character and setting to include important vistas to and from within the ACA. Consideration should be given to providing a high quality stone surface and or low level soft landscaping to the front of the church which would complement the Protected Structure and its setting, in-lieu of the proposed concrete paving.
 - f) It is proposed to retain an existing bus stop and bus shelter adjacent to the Former Baptist church (to include railing and piers) (RPS 7132) between Nos. 326 and 328 North Circular Road. The stop and shelter are also in front of a short terrace of two-storey 19th century brick properties at Nos. 328-334 North Circular Road which are considered to contribute

to the character of the Phibsborough Centre ACA. The present shelter detracts from the setting of both the adjacent Protected Structure and the ACA. No details have been provided in relation to the new bus shelter and the impact of the proposal has not been considered within the written statements of the EIAR.

- g) There are a number of additional structures included on the Record of Protected Structures on the subject map sheets. No direct adverse impacts on these structures are apparent; however there may be indirect impacts as a result of the proposed works during construction phase of the project. Protected Structures in close proximity to construction works should be adequately protected and all works are to be supervised by a conservation professional.

In all cases the design of any new infrastructure, signage, bus stop or bus shelter needs to be carefully considered in order to minimise potential negative visual impacts, support the reduction of clutter and improve legibility of adjacent protected structures, ACAs or red hatched Conservation Areas.

- Buildings and other non-Protected Structures (post boxes/milestones etc.) included in the National Inventory of Architectural Heritage (NIAH)
 - a) It is proposed to locate a bus stop on Manor Street in front of Nos. 67-70. No. 69 (NIAH 50070089) is considered to be of Regional Importance. No details have been provided in relation to the proposed bus stop/shelter. Notwithstanding this it is considered that the location of a bus stop in the immediate vicinity of the historic structure will adversely affect its setting.
 - b) The railway bridge carrying Old Cabra Road over the railway line to Amiens Street and North Wall (NIAH 50060148; Sheet 29) currently contains a bus stop by its north parapet. The positioning of this on the deck of the historic bridge has an adverse impact on its character and, while it is noted that the existing bus stop will be retained in its current position, no details have been provided in relation to any proposed upgrading of the bus stop or shelter as part of the works.

In both of these cases the design of the bus stop/shelter needs to be carefully considered with the aim of minimising potential negative visual impacts, to support the reduction of clutter and to improve legibility of the historic structure.

- c) It is proposed to relocate a number of post boxes
 - (NIAH 50060147; Sheet 29) located on the corner of Old Cabra Road and Glenbeigh Road,
 - (NIAH 50070519) on Blackhall Place
 - (NIAH 50070518) on Prussia Street
 - (CBC0005PB001; Sheet 21) on the Navan Road, near the junction with Kempton Ave. This freestanding cast-iron pillar box, which dates to c.1895 has not been recorded by the NIAH.

There is the potential for these post boxes to be damaged during relocation. Recording of the post boxes in their current location prior to removal and the supervision of the work by a conservation professional will be required

- Structures on the Dublin City Industrial Heritage Record Survey (DCIHR)
 - The No. 9 electric tram, which ran from Donnybrook to Phoenix Park along North Circular Road, crossed a section of the route on Sheet 31 (DCIHR 18 06 009). The DCIHR notes the potential for tramlines to survive beneath the existing road surfaces. Although the extent of resurfacing works has not been identified by the applicant it is understood that there is a potential for extensive areas of resurfacing across the proposed scheme. It is acknowledged that archaeological monitoring under licence (as defined in Chapter 15) will take place to include all DCIHR sites.
 - A Dublin Corporation tram which ran along Queen Street, George's Lane and terminated at a depot on Stanley Street, crossed a section of the route on Sheet 34 (DCIHR 18 07 045). Exposed sections of the tram lines set within a cobbled road surface extend partly into the proposed scheme at Brunswick Street North. The proposal for the historic street surface and exposed section of tram tracks is unclear, with Sheet 34 of the Landscaping General Arrangement Drawings stating that the paving setts and tracks are to be '*retained or reinstated*' while Section 1.2.2.8 of Appendix-A16.1-A16.3 states that the '*Existing tramlines and historic setts will be integrated into the proposed paving design where possible*'.
 As few tangible reminders of the city's tram network survive and the survival of historic tram tracks within the city is rare, these features will be required to be retained and protected. Clarity is also requested in relation to the proposals for the exposed section of tram tracks at Stanley Street/Brunswick Street North and any direct conflict with the proposed scheme should be designed out to facilitate the retention of the cobbled street surface and tram tracks in situ. The DCIHR notes the potential for further tramlines to survive beneath the existing adjacent road surfaces. The possibility of extensive resurfacing in this area is noted. It is acknowledged that archaeological monitoring under licence will take place, to include all DCIHR sites.
 - The route passes along the site of the old City Cattle Market (DCIHR 18 06 010) located along west side of Prussia Street (Sheet 31). The Cattle Market has been replaced with housing but the historic entrance gates survive on Prussia Street and are protected (RPS 6874). The setting of this entrance could potentially be impacted by landscaping works immediately in front of them as part of the proposed works. Any works in the vicinity of the entrance are to be supervised by a conservation professional.
 - The route corridor terminates near the site of the former Gravel Walk Slip which provided access to the River Liffey (DCIHR 18 11 214; Sheet 35) It is possible that remains of the slipway survive beneath the current carriageway. It is acknowledged that archaeological monitoring under licence will take place to include all DCIHR sites.
- Other unprotected structures that contribute positively to the architectural heritage and streetscape character
 - A number of houses (Sheets 21-28) which contribute positively to the streetscape, but are not protected under the RPS or recorded on the NIAH, will be impacted by proposed land-take (both temporary and permanent) including the alteration of boundaries that retain historic fabric as well as the loss of associated planting and grass verges. Although modest in their design, the variety of boundary treatments along Navan Road illustrates the

development of the city's early to mid-twentieth century suburbs, and their loss represents an erosion of the special character of the streetscape in suburban areas.

- As noted previously there is a lack of clarity in relation to the duration and therefore the impact of land acquisition associated with the proposed scheme. The following appears to be temporary land acquisition as no detail has been provided in relation to the reinstatement of boundary treatments: No.225 Navan Road; Nos. 257 and 255 Navan Road; Nos. 262 and 264 Navan Road; and Nos. 383-397 Navan Road (odd). Nos. 137-165 (odd) comprise largely detached houses including early 20th century bungalows, many of which have mature gardens and intact boundary treatments. It is stated that the proposed boundary treatment is to match existing, revised vehicular entrances are to be 3.6m wide and laneway access at Nos. 143 and 141 will be widened to 5.8m.
 - The following appears to be permanent land acquisition as details have been provided in relation to reinstatement of boundary treatment and vehicular access: Nos. 110-116 (even) Navan Road; Nos. 122 and 124 Navan Road; Nos. 198-212 (even) Navan Road; No. 263 Navan Road (to include proposed relocated access to facilitate new junction layout); Nos. 265-323 Navan Road (odd nos. between Ashtown Grove and Kinvara Avenue); and Nos. 331-351A Navan Road. In most cases, the proposed boundary treatment is to match the existing and vehicular entrances are to a maximum of 3.6m wide.
 - The removal and reinstatement of existing boundary treatments to unprotected structures should be carefully considered, particularly where these are of some quality and reflect a considered design intent respondent to the parent structure through the use of complementary detailing and materials. The reconstruction of these features should match as closely as possible the historic detailing/finishes. In cases where access is widened, new gates shall be facsimiles of the original allowing for the widened detail. These works should be designed and supervised by an expert in architectural conservation.
- Architectural Conservation Areas (ACAs) and Conservation Areas
 - See above commentary at '*Protected Structures/Proposed Protected Structures and their setting*' in relation to the bus stop adjacent to RPS 7132 within the Phibsborough Centre ACA
 - The proposed route corridor passes through red-hatch conservation areas at Prussia Street (Sheets 31 and 32) and Blackhall Place (Sheets 34, 35 & 36). The cumulative effect of additional signage and street furniture, bus gate, bus shelters/stops and changes to the urban realm may impact on the character of historic urban streetscapes of these areas. It is not clear what measures/interventions are proposed to provide a new bus gate at the junction between Stoneybatter and Blackhall Place. The location and design of new infrastructure, signage and bus stops/shelters should be carefully considered with the aim of minimising potential negative visual impacts, to support the reduction of clutter and to improve legibility of the historic streetscapes and adjacent heritage structures of the Conservation Area.
 - It is proposed to retain an existing bus stop and provide a bus shelter on the east side of Blackhall Place. This is located adjacent to a number of modest two-storey brick dwellings including Nos. 54 and 56 Blackhall place, both of which are on the NIAH and are considered to contribute to the character of the conservation area.

The existing bus stop is marked by a simple 'lollipop' type sign of limited visual impact. No details have been provided in relation to the new bus shelter.

- It is proposed to retain an existing bus stop and provide a bus shelter on the east side of Blackhall Place. This is located outside No.2-8 Blackhall Place which form part of a terrace of modest two-storey housing built by the Dublin Artisans' Dwellings Company in 1894. The existing bus stop is marked by a simple 'lollipop' type sign of limited visual impact. No details have been provided in relation to the new bus shelter.

In all cases the design of the new bus stop/shelter needs to be carefully considered with the aim of minimising potential negative visual impacts, to support the reduction of clutter and to improve legibility of the historic structure

- Potential impacts on historic paving and kerbing, historic street furniture and lamp standards and other features.
 - A section of historic granite kerbstones survives in two sections along the northeast side of Old Cabra Road (outside Nos. 54-64 and No. 74; Sheets 29 and 30). These are to be removed to facilitate the provision of a cycle lane, though the extent of removal is unclear. The route as illustrated on the General Arrangement drawings would indicate that all sections of kerbstones will be removed. These granite kerbstones are an important historic survivor along the street and should be retained.
 - Two short sections of granite kerbing survive to the footpath to the front of Nos.84-87 Prussia Street (Sheet 32). The impact of the proposed works on these is unclear. The surviving kerbstones should be retained as part of any upgrading works to the footpath.
 - Stone setts and limestone kerbstones located at the entrance to the Sisters of Charity Convent on Manor Street appear to be modern (Sheet 33). Notwithstanding this, these make a positive contribution to the arched entrance and stone gate lodge (RPS 4872). These may be impacted upon to facilitate the provision of a cycle track. It is recommended that the setts and kerbstones be retained.
 - Coal hole covers are to be retained to an area of paving adjacent to No. 16 Stoneybatter and No. 35 Stoneybatter (Sheet 34 of Landscaping General Arrangement). The location of these is not clear, nor is it clear whether the proposed works will impact on any basement/cellar areas below.
 - There is a lack of clarity in the method statement (contained in Section 1.2.3.2 of Appendix-A16.1-A16.3) in relation to the reinstatement of historic paving setts. While in many cases a stretcher bond will represent the traditional bonding arrangement, for the purposes of clarity it is the preference of the Conservation Section that the reinstatement of setts in original locations shall in the first instance reflect the existing historic bonding treatment.
 - See above commentary at *'Buildings and other non-Protected Structures (post boxes/milestones etc.) included in the National Inventory of Architectural Heritage (NIAH)'* in relation to relocation of postboxes on the NIAH.
 - A number of items have the potential to be impacted on during construction works and will need to be protected during construction works, as follows:
 - A lamp standard on the Navan Road comprising an historic cast-iron fluted base (CBC0005LP011; Sheet 21), located in front of Belleville and to the east of the

Ashtown Roundabout. This is considered to be a rare item of street furniture along this stretch of the route, and may reflect the reuse of an early vent pipe. The reuse of vent pipes as lamp standard bases has been identified elsewhere in Dublin.

- As noted previously, the submitted documentation does not fully represent the total number of c.1930 octagonal concrete electric lamp standards along Old Cabra Road (Sheets 29 and 30), of which there are nine all bearing a unique identifying number (CBC0005LP001). There is the potential for the lamp standards to be impacted during the construction phase of the project.
- Relocation of the c.1920 cast-iron lamp standard in the traffic island in front of Nos. 48-49 Manor Street (Sheet 33) during the works; note potential for loss or damage to this during its removal, transportation, storage and reinstatement.
- Section 1.2.4 of Appendix A16.1 refers to a '*lone single lamp outside No.39 Stoneybatter*', referenced by the applicant as CBC005BTH007, which has not been included in the list of identified lamp posts under Table 16.13 of Chapter 16 or plotted on the supporting map sheets. This should be retained *in situ* during the works.
- Two granite jostle stones flanking the vehicular entrance to Pender's Market at No.32 Stoneybatter have not been identified within the EIAR. These make a positive contribution to their setting and are considered to be vulnerable to damage from construction activities associated with the proposed works. They should be retained *in situ* during the works.
- Proposed works to any roads and streets with historic surfaces including paving, setts, setted drainage channels, kerbing and associated features such as original coal-hole covers, traditional manhole covers, and stone and cast-iron bollards shall have regard to the provisions of Appendix 7 and Appendix 8 of the Dublin City Council Development Plan 2016-2022.
- All practicable measures to avoid loss of or damage to historic street surfaces, materials and features shall be taken having regard to Section 14.4.1 of the *Architectural Heritage Protection Guidelines for Planning Authorities (2011)*, and to the Department of Housing, Local Government and Housing Advice Series on '*Paving: The Conservation of Historic Ground Surfaces*' (2015).
- Proposed Tree Removal and Provision of New Trees
 - The removal of trees will have a significant impact on the architectural character and setting of historic structures, both protected and unprotected, and streetscapes.
 - Note proposed removal of a number of both mature and young trees along the Navan Road, in particular the young trees in the vicinity of St. Vincent's Centre (RPS 5808) straddling Sheets 22-23)
 - Proposed new trees are indicated on the General Arrangement drawings to the front of RPS 6874, the Former City Arms Hotel, at No. 55 Prussia Street (Sheet 31). While the benefits of the introduction of trees within the city is acknowledged and supported in principle, the introduction of trees in this location has the potential to impact on the view of the protected structure from the street and their positioning should be reconsidered.

- **Boundary Treatments**
 - Where works require removal of existing roadside boundary walls, railings, entrances gates and hedgerows, together with areas of existing garden plantings garden trees, paving etc, boundary walls, railings, entrances gates and hedgerows to match existing should be reinstated at the setback location, pending agreement on more detailed design with the Planning Authority's Conservation Section and having regard to the provisions of the Architectural Heritage Protection Guidelines for Planning authorities (2011) and the relevant DHLGH Advice Series publication(s).
 - It is suggested that the characterful low railings that bound the traffic islands at the junction of Aughrim Street, Prussia Street and Manor Street might be retained. It is noted from the photomontages that these are to be removed.
 - See above commentary in relation to the bus stop adjacent the boundary wall and railings of The Law Society of Ireland on Blackhall Place.
- **Cycle Lanes**
 - Coloured tarmacadam to cycle lanes will alter the physical and visual character of the existing streetscapes to include Stoneybatter, lined with Protected Structures; Brunswick Street North, which retains some of the former industrial characteristics of the area; and at the Ashtown Gate entrance to the Phoenix Park.
 - The 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.
- **New Traffic Semaphore & Signage**
 - Careful consideration should be given to the siting of associated utilities and traffic management signage in relation to Protected Structures and Conservation Areas, historic paving and historic street furniture. Signage should be kept to the necessary minimum. The Conservation Section recommend that consideration is given to the rationalisation of all signage across the Bus Connects routes to reduce visual clutter.

Recommended Conditions

These are set out in the Appendix below.

2.4.10 City Architects Department Comments

The City Architects 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 proposed scheme will facilitate the modal shift from car dependency through the provision of walking, cycle, and bus infrastructure enhancements thereby contributing to an efficient, integrated transport system and facilitating a shift to a low carbon and climate resilient city.

It is noted that the proposals for public realm upgrades include widened footpaths and high quality hard and soft landscaping to contribute towards a safer, more attractive environment for pedestrians,

and that the scheme has been developed having regard to relevant accessibility guidance and universal design principles so as to provide access for all users.

The City Architects Division wishes to comment on the proposals, noting the following:

Local Public Realm Improvement Schemes:

The proposed scheme includes images of proposed public realm improvements at the following locations

- 1.** Stoneybatter Village: Junction at Aughrim Street (sheet 33) and
- 2.** Georges Lane (sheet 34)

however limited information is provided to facilitate proper assessment of the proposals. In addition, it is recognised that there is potential for the delivery of an enhanced public realm along the length of Manor Street and at Blackhall Street/Place.

Bus Shelter Design:

Bus shelter locations are indicated on the drawings but limited information provided on their design and whether there is sufficient capacity on the footpaths to accommodate them.

In the interest of visual amenity and having regard to protected structures and their settings, advertisements should not generally be permitted on bus shelters in Architectural Conservation Areas, or Conservation Areas designated in the City Development Plan.

Siting of utility cabinets and above-ground utility infrastructure:

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.

Palette of Materials

It is noted that the 'Typical Material Typologies' in Section 4.6.12.2.1, of Volume 2, Chapter 4 Proposed Scheme Description, and Volume 3, Figures, Chapter 4.5 Landscaping General Arrangement drawings, do not appear to include or refer to existing historic fabric such as historic granite paving and historic granite kerbs within the Proposed Scheme.

Palette of street furniture:

A full palette of street furniture to include street lighting, bins, benches, bollards, cycle stands, wayfinding poles, digi-panels etc. and confirmation on their proposed locations is required.

Confirmation is sought as to whether an identical palette is to be used for the proposed scheme across all the local authority administrative areas or whether each local authority (and perhaps specific urban villages) will have their own palette.

Confirmation is sought as to whether there will be uniformity in the palette of street furniture across all the BusConnects Core Bus Corridor Schemes.

Boundary treatments:

Where property boundaries along the route are to be relocated to facilitate land acquisition, the fabric in the existing boundaries should be assessed for their architectural conservation value and cultural value. The assessment should confirm whether the fabric, which may include railings, walls etc. is suitable for repair and re-use for sustainability reasons in the new boundaries rather than replaced with new.

Integration of the materials palette of the proposed scheme with existing private landing areas and recently upgraded areas of the public footpath:

A strategy for the resurfacing of private landings (with the owner's consent) and the retention/replacement of newly resurfaced areas of public footpath should be devised so a consistent paving palette is used throughout the proposed scheme

Village Signage:

Existing 'Welcome to Village xxx' signage provide local wayfinding landmarks and should be retained as part of the proposed scheme, in agreement with the local authority and community.

See appendix for more detailed recommendations/conditions

Comments on the Per Cent for Arts Scheme

The NTA should apply the Per Cent for Art Scheme as part of the development of each of the Bus Connects Core Bus Corridors. The Per Cent for Art scheme is a government initiative, first introduced in 1978, whereby 1% of the cost of any publicly funded capital, infrastructural and building development can be allocated to the commissioning of a work of art. Since 1997 this scheme has been made available to all capital projects across all government departments. This includes application relating to Transport and Roads. In July 2019, the Minister for Culture, Heritage and the Gaeltacht announced new bands and maximum limits for Per Cent for Art Scheme. Effective from 1 January 2020, the new investment bands and limits are:

- projects below €5,000,000: 1% of the cost of the project to a maximum of €50,000 (1% of upper limit)
- projects between €5,000,000 and €20,000,000: 1% of the cost of the project to a maximum of €125,000 (1% at median)
- projects between €20,000,000 and €50,000,000: 1% of the cost of the project to a maximum of €350,000 (1% at median)
- projects in excess of €50,000,000: Up to €500,000 being 1% of the lower level scale and declining as projects increase in scale

Each of the Bus Connects Core Bus Corridors is treated as a separate capital project and therefore the Per Cent for Art Scheme should be individually applied.

For further information:

<https://www.gov.ie/en/publication/38b6d-per-cent-for-art/#:~:text=The%20Per%20Cent%20for%20Art,of%20a%20work%20of%20art.>

Implementation of the Per Cent for Art Scheme: Bus Connects Core Bus Corridor Routes

The City Arts Office which has specialist public art expertise will manage the commissioning process working closely with colleagues in Dublin City Council involved in the development of the Bus Connects Core Bus Corridor Routes and with the National Transport Authority. The commissioning process will follow the National Guidelines for the Per Cent for Art Scheme as published by the Irish Government (2004). The initial stage of the process will include devising an approach to the commissioning programme which is appropriate for the commissioning context and the capital project. This service will also include drafting the brief, organising the competition, selection of the artists, drafting contracts, managing the finance and liaising with the commissioners and appointed artists throughout the commissioning process. In addition, each commission will be comprehensively documented.

2.5 Conclusion

The proposed Blanchardstown to City Centre Core Bus Corridor Scheme is supported and welcomed by Dublin City Council as it will ensure the delivery of a number of key policies and objectives of the Dublin City Development Plan 2016-2022 as well as the draft Dublin City Development Plan 2022-2028. The development of the Core Bus Corridor Scheme will provide an upgraded and expanded bus network and quality of service together with better quality cycling and pedestrian facilities. These improvements will make it easier for people to access and use public transport. In turn, this will promote modal shift from the private car to more sustainable forms of transport including walking, cycling and public transport, ultimately contributing to the creation of a greener and more sustainable city.

With regard to compliance with European, national and local policies and requirements, it is considered that An Bord Pleanála is the competent planning authority, however, Dublin City Council is satisfied that the application generally accords with all such requirements in addition to being consistent with, and supported by, the statutory Dublin City Development 2016-2022. In the event that An Bord Pleanála is satisfied that the proposed development should be approved, the Planning Authority requests that the scheme be approved subject to conditions to ensure that the development is carried out in accordance with the proper planning and sustainable development of the area and suggested conditions are included in the appendix attached to this report.

APPENDIX

Recommendations/Conditions

Dublin City Council and the National Transport Authority

1. That a comprehensive agreement is put in place between Dublin City Council and the NTA regarding how the corridor is to be handed over to the NTA and its contractors, what pre-inspection and recording of the corridor is necessary and how the corridor is to be maintained during construction activities and by whom. The agreement shall also address the handback process, the treatment of all relevant records treated and how the corridor is to be accepted back by Dublin City Council following construction.
2. Following handback, a separate agreement shall be put in place between Dublin City Council 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.
3. All relevant Dublin City Council departments involved with the development of the Scheme shall be consulted during the detailed design development process for the Scheme and the NTA shall incorporate the requirements of the Dublin City Council departments into the final detailed design of the Scheme.

Environment and Transport Department Recommendations/Conditions

Traffic Division

1. All the traffic management equipment that is necessary for the safe and efficient operation of this Public Transport corridor, including all traffic signal equipment, shall be to the relevant Dublin City Council specification and only the relevant Dublin City Council maintenance contractor shall be permitted to undertake electrical or system control work on either the existing or new traffic signals.

Roads Division

Handover:

1. Prior to commencement of any works, a formal Handover Procedure Agreement shall be agreed with Dublin City Council and put in place. This procedure shall be carried out on any section of work as soon as it is completed. A global handover of all works at the end of the construction period shall not be permitted. As-built drawings of each section of the finished works shall be provided in A1 sized hard copy to an appropriate scale and also in electronic format compatible with DCC's current version of Microstation. These as built drawings shall include details of new services and alterations to existing services. Drawings shall also be provided showing exactly what areas are to be in DCC's charge

Existing Condition Record:

1. A photographic record of all areas in Dublin City Council's control to be affected by the Bus connects scheme works shall be provided to Dublin City Council (DCC) prior to the commencement of any work.

2. Drawings distinguishing between antique granite footways and kerbs and new granite footways and kerbs shall be submitted as part of detailed design development of approved scheme.
3. Drawings clearly demarcating private landings shall submitted as part of detailed design development of approved scheme.

Design:

1. Final details (including materials, finishes, sizes, gradients, levels and drainage) of all junctions, carriageways, islands, buildouts and footways as well as all signal/traffic light infrastructure shall be agreed with DCC prior to construction.
2. All Construction works shall comply with the "Construction Standards for Roads and Street Works in Dublin City Council".
3. Road Safety Audits shall be carried out for each public road that is to be modified as part of the Bus Connects scheme works at appropriate stages throughout the design of each individual scheme.
4. The alignment of the Bus Connects scheme shall be designed so as ensure that all longitudinal gradients and crossfalls on carriageways, islands, buildouts and footways are in accordance with those specified in "Construction Standards for Road and Street Works in Dublin City Council" unless otherwise agreed with DCC.
5. Pedestrian priority shall be ensured throughout the Scheme design through signage and physical design measures where appropriate.
6. Buffer strips shall be provided at all locations where cycle lanes run between parking and loading areas and the kerb/footpath to ensure pedestrians including those with disabilities can safely alight from vehicles.
7. The Scheme shall ensure that principles of universal design are adhered to and accessibility requirements are met throughout the Scheme.
8. Modifications to existing in-curtilage car parking of properties impacted by the works shall ensure a footprint of 5 metres by 3 metres for car parking is retained in order to avoid parked cars overhanging the public footpath.
9. Alterations to kerbside spaces such as pay and display scheme/loading/line markings/signage pole shall be agreed with the Planning Authority to ensure adequate loading and set down is provided.
10. All signage and road markings to comply with the Traffic Signs Manual.

Reinstatement:

1. All reinstatement work and areas to be taken in charge shall be carried out in accordance with "Construction Standards for Road and Street Works in Dublin City Council" unless otherwise agreed with DCC.
2. The extent and type of the reinstatement required shall be agreed with DCC prior to commencement of any work on site. This shall be shown on drawings and signed off on by both parties.
3. All works to public roads in DCC's Functional Area shall comply with the Council's Construction Standards for Road and Street Works in Dublin City.
4. Samples of all new natural stone kerbs, flags and setts to be used in reinstatement works shall be supplied to DCC for agreement prior to use.

Construction Period:

1. All roadworks shall be carried out in accordance with the current edition of Dublin City Council's Directive for the Control and Management of Roadworks in Dublin City unless otherwise agreed with DCC.
2. In cases of reinstatement of areas where the roadway or footway is not being reconstructed in full (e.g. trench for utility along side street) the NTA or their Contractor shall pay DCC long term damages charges as set out in the current edition of Dublin City Council's Directive for the Control and Management of Roadworks in Dublin City.
3. All antique setts if removed as part of the works shall be cleaned, stored on pallets by the contractor and reinstated in the carriageway to DCC's specification if required by DCC unless otherwise agreed with Dublin City Council.
4. All existing and antique natural stone kerbs and flags, if removed without damage as part of the works, shall be cleaned, stored on pallets by the contractor and reinstated in the footway to DCC's specification.
5. During construction and prior to opening of the Scheme, the National Transport Authority shall undertake an awareness, education and behavioural change programme to educate road users as how to use the Scheme with particular regard to interaction between pedestrians and cyclists.

Miscellaneous

1. Where cellars exist and are effected by the scheme, these shall be acquired in whole or in part only where necessary for implementation of the proposed scheme.

Public Lighting

In terms of delivering the public lighting elements of this project, it is recommended that careful consideration be given during the detailed design process to all the various different elements

including the required light level design and the relevant EN certification as well as existing heritage and high value lighting Columns. .

In addition there is the agreed condition for the survey and handover of all items along the corridor and these would include the public lighting infrastructure and all associated items, careful consideration of existing and proposed trees within the corridor is also required as to their impact on lighting levels.

1. It must be noted that special consideration must be given to any scheme where the Public lighting is mounted on ESB Networks Infrastructure.
2. Public lighting works may only be carried out on street lights mounted on ESB Networks in accordance with 'ESB Requirements for Work on Public Lighting on ESB's Networks' and by Public Lighting Contractors who have the required training and approvals for such work. These requirements impose stringent requirements on Local Authorities and Contractors.

Temporary Lighting

1. If the route where works are being carried out remains open for public use, e.g. to facilitate the continued movement of vehicles and pedestrians, then the route must be lighted at all times during night time hours.

Environmental Protection Division

The key requirements for this development from a surface water/drainage/flood management perspective are outlined as follows:

1. This development must comply with the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0 (available from www.dublincity.ie Forms and Downloads). In particular:
 - Continuous Kerbs incorporating drainage, as outlined in Figure 2, Page 3 in Appendix K Drainage Design Basis Document, are not accepted by DCC Drainage Planning, Policy and Development Control.
 - Enclosed drainage channels such as slot drains or "ACO" drains are not accepted by Drainage Planning, Policy and Development Control.
 - The hybrid gully outlined in Section 1.1.3, Page 4 in the BusConnects - Road run-off collection gullies Technical Paper is not accepted by DCC Drainage Planning, Policy and Development Control. The use of narrow profile gullies as previously agreed is welcome.
2. The development shall incorporate Sustainable Drainage Systems in the management of surface water, providing an integrated approach with the landscaping proposals. Full details of these shall be agreed in writing with DCC Drainage Planning, Policy and Development Control prior to commencement of construction. Soft landscaping should be considered before hard landscaping. The SuDS design should refer to the new Dublin City Council Sustainable Drainage Design and Evaluation Guide published in 2021.

3. The detailed drainage design shall be agreed in writing with DCC Drainage Planning, Policy and Development Control prior to commencement of construction. Surveys on the location and condition of surface water infrastructure sewers, both pre and post development, shall be carried out by the developer and any damage rectified. Any diversions shall be agreed in writing, prior to commencement, with Drainage Planning, Policy and Development Control. To avoid multiple connections to combined sewers a separate surface water network should be constructed. Details on proposed connection locations to the surface water network and flow discharges shall also be agreed.
4. To support our achievement of our legislative obligations the Blanchardstown to City Centre CBC proposal should not cause a deterioration of the status of any waterbody to which it is contiguous with downstream and furthermore should support the attainment of good ecological and good surface water chemical status, in accordance with DCC and national obligations. The NTA shall provide an evidence-based assessment of the impact, if any, of the proposed scheme on the water quality status of rivers within the curtilage of the proposed project, including both ecological and chemical status.
5. The NTA shall confirm in writing to Drainage Planning, Policy and Development Control that the development has been designed such that the risk of flooding to the development has been reduced as far as is reasonably practicable, and that the proposals do not increase the risk of flooding to any adjacent or nearby area. This includes assessment of pluvial flood risk at all locations along the route (not just where sections are 150m long). The effect of climate change on flooding, +20% rainfall and 0.5m sea level rise should be allowed for in calculations. Any changes in ground profile shall be modelled to demonstrate no increase in flood risk and to reduce it where reasonably possible.
6. The developer must demonstrate that this development passes the three stages of the SFRA Justification Test, particularly for tidal and fluvial flooding.
7. New compensatory SuDS measures should be provided close to any green areas lost.
8. As-built drawings of all drainage networks and SuDS measures shall be provided by the NTA on completion of the works.

Recommendations/Conditions – Air and Noise Pollution Control Unit

1. Noise Control and Air Quality Control - Demolition and Construction Phase.
It is recommended that the works must be carried out having regard to a Construction Management Plan submitted with the application. The plan must be written having regard to this Unit's Good Practice Guide for Construction and Demolition (below link). The plan must be approved by the Planning Department before work commences.
<https://www.dublincity.ie/residential/environment/air-quality-monitoring-and-noisecontrol-unit/good-practice-guide-construction-and-demolition#>

Archaeology

The report notes that the proposed bus corridor runs within the Zone of Archaeological Constraint for the Recorded Monument DU018-020 (Historic City) from Prussia Street until the southern termination of the scheme at Ellis Quay. DU018-020 (Historic City) is listed on the Record of Monuments and Places (RMP) and is subject to statutory protection under Section 12 of the National Monuments (Amendment) Act 1994. The site is also located within the Zone of Archaeological Interest in the Dublin City Development 2016-22. The report comments only on the sections of the proposed route within the Dublin City area (Sheets 3 – 6). The relevant sections of the proposed bus corridor comprise:

- Navan Road/Ashtown Road Junction to Navan Road/Old Cabra Road Junction
- Navan Road/Old Cabra Road Junction to Ellis Quay.

The report notes that the archaeological and cultural heritage impacts associated with the construction and operation of the proposed scheme are assessed in Chapter 15 of the EIAR. The observations of the Archaeology section are set out in the assessment of the EIAR above.

The Archaeology Section of Dublin City Council concurs with the findings of the archaeological assessment in the EIAR and supports the proposed mitigation measures proposed in it.

It is further recommended that:

1. The NTA appoints a project archaeologist to oversee the delivery of the archaeological strategy.
2. That the primary archaeological paper archive for all excavations be prepared and deposited with the Dublin City Archaeological Archives within a timeframe to be agreed with the planning authority.

Conservation

Recommendations/Conditions

1. To safeguard the special architectural interest of the Architectural Heritage across the Bus Connects routes - including Protected Structures and Conservation Areas, landscaping, historic paving, setts, kerbing and associated features, boundary treatments, historic street furniture, gardens and trees and historic public realm etc. - and to ensure that the proposed repair works will be carried out in accordance with best conservation practice with no unauthorised or unnecessary damage or loss of historic fabric, the Conservation Section submit that all works shall be designed and supervised by an expert in architectural conservation in accordance with the provisions of the Dublin City Development Plan 2016-2022, the *Architectural Heritage Protection Guidelines for Planning Authorities (2011)* and relevant documents of the DHLGH Advice Series.
2. The conservation professional shall ensure adequate protection of the retained and historic fabric during the proposed works and across all preparatory and construction phases. In this regard, all works shall be designed to cause minimum interference to historic fabric.

3. In accordance with best conservation practice, specifications and method statements for the careful and sensitive relocation and reinstatement of historic fabric identified in the report above, and in particular to Protected Structures, sites on the NIAH and DCIHR, and structures and features in Architectural Conservation Areas (ACAs) across the Bus Connects routes shall be submitted by the conservation professional to the Planning Authority for its approval.
4. The conservation professional shall advise the Conservation Section on architectural heritage and conservation matters that may have further impacts on the project throughout the construction phases.
5. If, through the course of construction work across the Bus Connects routes, hitherto unknown and concealed architectural heritage fabric is found, the conservation professional shall contact the Conservation Section to advise them of the discovery as the presence of historic fabric may inform an alternative strategy for a design proposal that would enhance the setting of a Protected Structure, Architectural Conservation Area or Conservation Area.
6. All works shall be carried out in accordance with best conservation practice and the Architectural Heritage Protection Guidelines for Planning Authorities (2011) and the Advice Series issued by the Department of the Housing, Local Government and Heritage. All repair works shall retain the maximum amount of surviving historic fabric in situ. Items to be removed for repair off-site shall be recorded prior to removal, catalogued and numbered to allow for authentic re-instatement.
8. All repair of historic fabric shall be scheduled and carried out by appropriately experienced conservators of historic fabric.
9. The Conservation Section recommends the following specific measures:
 - a) All bus shelters/stops and infrastructure associated with the scheme to include digital signage/advertising boards shall be designed / located with the aim of minimising potential negative visual impacts, to support the reduction of clutter and to improve legibility of adjacent protected structures and their setting.
 - b) Consideration shall be given to the rationalisation of all signage across the route to reduce visual clutter.
 - c) Consideration shall be given to relocating the proposed bus stop/shelter in front of the Law Society of Ireland on Blackhall Place to in front of the adjacent modern building on the corner of Blackhall Place and Hendrick Place. It is the preference of the Conservation Section that the shelter is removed from this bus stop.
 - d) The proposed bus shelters to the immediate south of St Peter's Church on North Circular Road; to the immediate north of St Peters Church on Cabra Road; and in front of No.9 and 10 Dalymount should be omitted from the proposed scheme.
 - e) Details to be provided in relation to the relocation of post box (NIAH 50070519) on Blackhall Place. Note that the recording of the post box in its current location prior to its removal and the supervision of the work by a conservation professional will be required.

- f) Detailed proposal to be provided in relation to the exposed section of tram tracks at Stanley Street/Brunswick Street North. The Conservation Section requests that any direct conflict with the proposed scheme be designed out to facilitate the retention of the cobbled street surface and tram tracks in situ.
- g) The proposal to install a cantilever signal pole adjacent the historic entrance and gate lodge of St Vincent's Home on the Navan Road (RPS 5808) should be subject to further review.
- h) Consideration shall be given to relocating the existing bus stop/shelter which is currently positioned in front of the St Vincent's Home on the Navan Road (RPS 5808) to in front of the Aura De Paul Swimming Pool.
- i) The removal and reinstatement of existing boundary treatments to unprotected structures on the Navan Road shall be carefully considered, particularly where these are of some quality and reflect a considered design intent respondent to the parent structure through the use of complementary detailing and materials. Where land acquisition is unavoidable, historic boundary features should be reinstated in their new locations on a 'like-for-like' basis, under the design and supervision of a conservation professional. In cases where vehicle access is widened, new gates shall replicate the original allowing for the widened detail.
- j) Consideration shall be given to providing a high quality stone surface and/or low level soft landscaping to the front of St Peter's Catholic Church (RPS 1730) located within the Phibsborough Centre ACA, in-lieu of the proposed concrete paving.
- k) Two sections of historic granite kerbstones along the northeast side of Old Cabra Road (outside Nos. 54-64 and No. 74) should be protected and retained as part of the scheme.
- l) Two sections of granite kerbing to the front of Nos.84-87 Prussia Street should be protected and retained as part of the scheme.
- m) Stone setts and limestone kerbstones located at the entrance to the Sisters of Charity Convent on Manor Street should be protected and retained as part of the scheme.
- n) Notwithstanding that in many cases a stretcher bond will represent the traditional bonding arrangement for historic sett surfaces, for the purposes of clarity it is the preference of the Conservation Section that the reinstatement of setts in original locations shall in the first instance reflect the existing historic bonding treatment.
- o) A lamp standard on the Navan Road comprising an historic cast-iron fluted base (CBC0005LP011), located in front of Belleville and to the east of the Ashtown Roundabout should be protected and retained as part of the scheme.
- p) All nine c.1930 octagonal concrete electric lamp standards along Old Cabra Road should be protected and retained as part of the scheme (CBC0005LP001).
- q) The lamp standard in front of No.39 Stoneybatter should be protected and retained as part of the scheme (CBC005BTH007).
- r) Two granite jostle stones flanking the vehicular entrance to Pender's Market at No.32 Stoneybatter should be protected and retained as part of the scheme.
- s) Whilst the benefits of the introduction of trees within the city is acknowledged and generally supported in principle, the positioning of proposed new trees to the front of RPS 6874, the Former City Arms Hotel, at No. 55 Prussia Street (Sheet 31) should be reconsidered to prevent obstruction of views to and from the Protected Structure.

- t) Where cycle ways are located in close proximity to Protected Structures and within Architectural Conservation Areas generally, consideration should be given to an alternative high quality cycle lane surface in-lieu of red tarmacadam.

City Architects Recommended Conditions
Local Public Realm Improvement Schemes

Detailed drawings and specifications of the proposed urban realm improvement schemes at Stoneybatter Village including details of the junction with Aughrim Street and George's Lane as well as proposals for the upgrading of the public realm along Manor Street and Blackhall Street shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Bus Shelter Design

Full details of the design and type of bus shelters for each location shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. The location of new bus shelters in the vicinity of buildings of architectural importance and in Architectural Conservation Areas and designated Conservation areas should be carefully considered.

Siting of utility cabinets and above-ground utility infrastructure:

The siting of all utility cabinets and other above-ground utility infrastructure shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Palette of Materials

The extent of existing hard landscape to be retained within the Proposed Scheme shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

All historic fabric shall be recorded and retained within the proposed scheme in accordance with best conservation practice and shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Palette of street furniture:

A full palette of street furniture and their proposed locations across all the proposed BusConnects Core Bus Corridor Schemes, shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development

Boundary Treatments

The fabric in all property boundaries which are to be relocated to facilitate land acquisition along the Proposed Scheme should be assessed for their architectural conservation value and cultural value. This assessment should be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

The fabric in all property boundaries which are to be relocated to facilitate land acquisition along the proposed scheme should be assessed to see whether it may be suitable for repair and re-use for sustainability reasons in the new boundaries rather than replaced with new. This assessment should be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Side Road Entry Treatment

Raised tables should be provided insofar as possible at junctions to side streets/ roads along the route of the Proposed Scheme while having regard to Road Safety and Access Audits etc. This shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Integration of the materials palette of the proposed scheme with existing private landing areas and recently upgraded areas of the public footpath:

A strategy for the resurfacing of private landings and the retention/replacement of newly resurfaced areas of public footpath should be devised so a consistent paving palette is used in the proposed scheme. This information shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Village Signage:

Village signage should be incorporated into the proposed scheme, and a scheme of city wide co-ordinated village signage should be undertaken and shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Per Cent for Art Scheme

1. The Proposed Scheme shall incorporate public art in accordance with the provisions of the Per Cent for Art Scheme. The process of commissioning public art within Dublin City Council's administrative area shall be managed by Dublin City Council's Arts Office in accordance with national guidelines, 'Public Art: Per Cent for Art Scheme' (2004) and in consultation with the National Transport Authority.

Reason: To animate the public domain and promote the arts and culture in the city.



Richard Shakespeare
Assistant Chief Executive
Dublin City Council

An Roinn Phleanála & Forbairt Maoin
Oifigí na Cathrach, An Ché Adhmaid, Baile Átha Cliath 8
Oifigeach Poiblí Ainmnithe faoin Acht um Brústocaireacht a Rialúil 2015

Planning & Property Development Department,
Block 4, Floor 3, Civic Offices, Wood Quay, Dublin 8.
Designated Public Official under the Regulation of Lobbying Act 2015

T. 01 222 3319 F. 01 222 2278 mary.conway@dublincity.ie

An Bord Pleanála,
64 Marlborough Street,
Dublin 1

30th August 2022

Re: Bus Connects: Blanchardstown to City Centre Core Bus Corridor Scheme

An Bord Pleanála Ref No: HA 29N.313892

Dear Secretary,

Please find enclosed the submission from the Executive of Dublin City Council submitted under Section 51(2) of the Roads Act 1993 (As amended).

If you require any further information, please contact me.

Can you please acknowledge receipt of this submission.

Yours sincerely,

Mary Conway
Deputy City Planner