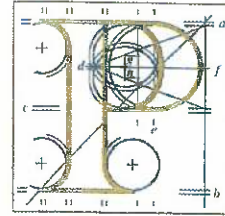


Our Case Number: ABP-314942-22



An  
Bord  
Pleanála

Bryan Ward  
Acting Deputy City Planning Officer  
Dublin City Council  
Planning & Development  
Civic Offices  
Block 4, Floor 3  
Wood Quay  
Dublin 8

**Date:** 18th April 2023

**Re:** BusConnects Lucan to City Centre Core Bus Corridor Scheme  
Lucan to Dublin City Centre

Dear Sir,

An Bord Pleanála has received Dublin City Council's submission via email on the 17<sup>th</sup> April, 2023, in relation to the above mentioned proposed road development and will take it into consideration in its determination of the matter.

Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

If you have any queries in relation to this matter please contact the undersigned officer of the Board.

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

  
Niamh Thornton  
Executive Officer

HA03

Tel	Tel	(01) 858 8100
Glaao Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Riomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

## Shaun McGee

---

**From:** Shaun McGee  
**Sent:** Monday 17 April 2023 16:57  
**To:** Shaun McGee  
**Subject:** FW: DCC's Observtions re BusConnects Lucan to City Centre ABP-314942-22  
**Attachments:** Lucan to City Centre Core Bus Corridor Scheme Report.docx; ABP-314942-22 - Letter to DCC requesting submission on application.pdf

-----Original Message-----

**From:** Bryan Ward <bryan.ward@dublincity.ie>  
**Sent:** Monday, April 17, 2023 4:25 PM  
**To:** Shaun McGee <S.McGee@pleanala.ie>  
**Subject:** RE: DCC's Observtions re BusConnects Lucan to City Centre ABP-314942-22

Hi Shaun.

Thank you for the letter requesting observations in relation to the Bus Connects Lucan to City Centre Core Bus Corridor Scheme (dated 17th April 2023). Please find the correct submission attached. I'd appreciate it if you would confirm receipt of the submission and please do not hesitate to contact me directly if there are any further issues.

Regards  
Bryan

Bryan Ward|Acting Deputy City Planner|Head of Development Management Dublin City Council, Block 4, Floor 3, Civic Offices, Dublin 8, Ireland T +353 1 2226169 | F +353 1 222 2830 |  
E bryan.ward@dublincity.ie | <https://eur01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.dublincity.ie%2F&data=05%7C01%7CS.McGee%40pleanala.ie%7Cc26c865d380b4dae509908db3f5c6bf1%7Cda4b02cb99534ab9abd9bcfe6c687ebb%7C0%7C0%7C638173438793859325%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=4IKuWdK20BjpZYgf%2Bef9JIGpeJOZUDUQBmN7SnwbKm0%3D&reserved=0>

-----Original Message-----

**From:** Shaun McGee <S.McGee@pleanala.ie>  
**Sent:** Monday 17 April 2023 13:21  
**To:** Bryan Ward <bryan.ward@dublincity.ie>  
**Subject:** RE: DCC's Observtions re BusConnects Lucan to City Centre ABP-314942-22

Hi Bryan

Please find enclosed letter - ABP-314942-22 - Letter to DCC requesting submission on application, which will also issuing by post.

Please feel free to contact me, if I can be of further assistance.

Regards

Shaun

**Written Submission from Dublin City  
Council Chief Executive  
to An Bord Pleanála  
in relation to  
the National Transport Authority's  
BusConnects Dublin – Lucan to City Centre Core Bus Corridor Scheme  
An Bord Pleanála Ref. ABP-314942-22**

<b>AN BORD PLEANÁLA</b>	
17 APR 2023	
LTR DATED _____	FROM _____
LOG- _____	
ABP- 314942-22	

<b>1.0</b>	<b>Application</b>
<b>1.1</b>	<b>Scope of Report</b>
<b>2.0</b>	<b>Description of the Proposed Development</b>
<b>2.1</b>	<b>Relevant Planning History</b>
<b>2.2</b>	<b>Policy Context</b>
<b>2.2.1</b>	<b>Regional Level</b>
<b>2.2.2</b>	<b>Citywide Level</b>
<b>2.2.2.1</b>	<b>Dublin City Development Plan 2016-2022</b>
<b>2.2.2.1</b>	<b>Strategic Development and Regeneration Areas</b>
<b>2.2.2.1.2</b>	<b>Area Specific Plans</b>
<b>2.2.2.2</b>	<b>Draft Dublin City Development Plan 2022-2028</b>
<b>2.2.2.2.1</b>	<b>Draft Area Specific Plans</b>
<b>2.3</b>	<b>Departmental Comment</b>
<b>2.4</b>	<b>Planning Assessment</b>
<b>2.4.1</b>	<b>Planning Policy</b>
<b>2.4.2</b>	<b>Environmental Impact Assessment Report (EIAR)</b>
<b>2.4.3</b>	<b>Natura 2000</b>
<b>2.4.4</b>	<b>Zoning and other designations</b>
<b>2.4.4.1</b>	<b>Land Use Zoning Objectives</b>
<b>2.4.4.2</b>	<b>Built Heritage Objectives</b>
<b>2.4.5</b>	<b>Impact on Amenity</b>
<b>2.4.6</b>	<b>Strategic Observation from the Forward Planning Section</b>
<b>2.4.7</b>	<b>Environment and Transportation Department Comments</b>
<b>2.4.7.1</b>	<b>General Comments</b>
<b>2.4.7.2</b>	<b>Traffic Division Comments</b>
<b>2.4.7.3</b>	<b>Roads Division</b>
<b>2.4.7.4</b>	<b>Public Lighting Section Comments</b>
<b>2.4.7.5</b>	<b>Environmental Protection Division Comments</b>
<b>2.4.8</b>	<b>City Archaeologist Comments</b>
<b>2.4.9</b>	<b>Conservation Section Comments</b>
<b>2.4.10</b>	<b>City Architects Division Comments</b>
<b>2.4.11</b>	<b>City Parks, Biodiversity and Landscape Division Comments</b>
<b>2.5</b>	<b>Conclusion</b>

## **Appendix 1 – Recommended Conditions**

## 1.0 Lucan to City Centre Core Bus Corridor Scheme

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The National Transport Authority 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 Lucan to City Centre Core Bus Corridor Scheme together with all ancillary and consequential works for the purpose of facilitating public transport.

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### 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 Lucan 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.

The BusConnects programme seeks to greatly improve bus services in Irish cities, including Dublin, so that journeys by bus will be fast, reliable, punctual, convenient and affordable. As set out in later section below, BusConnects is part of the Government's policy to improve public transport and address climate change in Dublin and other cities. BusConnects is included as a specific policy objective of Project Ireland 2040 – The National Development Plan 2018 – 2027 (Government of Ireland 2018); and the Climate Action Plan 2021 (Government of Ireland 2021b).

## 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 Scheme has an overall length of approximately 9.7km. It will commence at Junction 3 of the N4 Lucan Road / Lucan Bypass where the C-Spine route terminates before splitting to branch routes and is directed east towards the City Centre (C-Spine is the Dublin Bus term for the network serving Maynooth, Celbridge, Leixlip, Lucan, Adamstown, Liffey Valley and Palmerstown). From the R136 Ballyowen Road junction with the R835 Lucan Road the Proposed Scheme will run east down the R835 Lucan Road to the roundabout serving the Lucan Retail Park and the N4 Lucan Road eastbound on-slip. It does not include the provision on Ballyowen Road or Old Lucan Road (Route 80) at Palmerstown. The Proposed Scheme will continue via the N4 (passing the Liffey Valley Shopping Centre at Junction 2) as far as the M50 Junction 7 and then via the R148 along Palmerstown bypass, Chapelizod bypass, Con Colbert Road, St John's Road West, ending at Frank Sherwin Bridge, where it will join the prevailing traffic management regime on the South Quays. The Proposed Scheme will significantly enhance travel by public transport by providing bus priority as well as improved pedestrian and cycling infrastructure on the N4 and R148 to and from the City Centre.

In addition to the improvements to bus journey times and journey time reliability, the Proposed Scheme will provide significant benefits for cyclists and pedestrians. The scheme design has been developed having regard to the relevant accessibility guidance and universal design principles so as to provide access for all users. The Proposed Scheme will provide improved pedestrian crossing facilities along the route, with an increase in the number of signalised crossing points, and the provision of side road ramps.

Cycle facilities are provided at Junction 3 of the N4, along R136 Ballyowen Road between Hermitage Road and the R835 Lucan Road, and then along the length of the Core Bus Corridor to Junction 2 of the N4. From there cycle facilities are provided along the Old Lucan Road either side of the M50 and through Palmerstown village, to the start of the R148 Chapelizod bypass, at which point they will connect with other future cycle facilities through Chapelizod village. Cycle facilities are also provided on the R148 between Con Colbert Road and the end of the corridor at Heuston station on St John's Road West

Several urban realm upgrades, including widened footpaths, high quality hard and soft landscaping and street furniture will be provided in areas of high activity to contribute towards a safer, more attractive environment for pedestrians. The primary objective of the Proposed Scheme, therefore, is the facilitation of 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.

The Proposed Scheme commences at Junction 3 on the N4 where the C-Spine route terminates before splitting to branch routes, and it is routed via the N4 as far as Junction 7 (M50), and via the R148 along

the Palmerstown Bypass, Chapelizod Bypass, Con Colbert Road and St John's Road West as far as Frank Sherwin Bridge, where it will join the prevailing traffic management regime on the South Quays. The Proposed Scheme is described below, split into three sections to reflect the national, suburban and urban nature of the corridor.

- Section 1: N4 Junction 3 to M50 Junction 7 – N4 Lucan Road;
- Section 2: M50 Junction 7 to R148 Con Colbert Road – R148 Palmerstown bypass and Chapelizod bypass; and
- Section 3: R148 Con Colbert Road to City Centre – St John's Road West.

#### **Section 1: N4 Junction 3 to M50 Junction 7 – N4 Lucan Road**

This section of the Proposed Scheme runs from Junction 3 on the N4 Lucan Road / Lucan bypass, as far as M50 Junction 7 and, as described below, will include upgrades to the following junctions to provide bus priority and enhanced pedestrian and cyclist facilities:

- R136 Ballyowen Road / R835 Lucan Road;
- R136 Ballyowen Road / N4 Junction 3;
- R136 Ballyowen Road / Hermitage Road;
- N4 Junction 2; and
- N4 / M50 Interchange (Junction 7)

#### **Section 2: M50 Junction 7 to R148 Con Colbert Road – R148 Palmerstown bypass and Chapelizod bypass**

On this section between M50 Junction 7 and R148 Con Colbert Road – R148 Palmerstown bypass Chapelizod bypass junctions, as described below, it is proposed to upgrade the following junctions to provide bus priority and enhanced pedestrian and cyclist facilities:

- R148 Palmerstown bypass / Kennelsfort Road;
- Old Lucan Road / Kennelsfort Road Lower; and
- R148 Palmerstown bypass / The Oval.

#### **Section 3: R148 Con Colbert Road to City Centre – St John's Road West**

On this section between R148 Con Colbert Road – Chapelizod bypass and Frank Sherwin Bridge – St John's Road West junctions, as described below, it is proposed to upgrade the following junctions to provide bus priority and enhanced pedestrian and cyclist facilities:

- R148 Chapelizod bypass / R148 Con Colbert Road
- R148 Con Colbert Road / R839 Memorial Road;
- R148 Con Colbert Road / R111 South Circular Road;
- R148 St John's Road West / R111 South Circular Road;
- R148 St John's Road West / Heuston South Quarter;
- R148 St John's Road West / Military Road;
- R148 St John's Road West / Heuston Station; and
- R148 St John's Road West / Victoria Quay (Frank Sherwin Bridge)

The sections of the proposed scheme within the administrative area of Dublin City Council comprise the following public roads and associated junctions:

- R148 Chapelizod bypass
- R148 Con Colbert Road
- St John's Road West
- Victoria Quay (Frank Sherwin Bridge).

The construction phase for the proposed scheme is anticipated to take approximately 24 months to complete and will be based on individual sectional completions that will have shorter individual durations. The Construction Compounds will be located at the following sites:

- Construction Compound 1: Located northeast of the N4 Junction 2, with access / egress from Old Lucan Road
- Construction Compound 2: Located between the N4 National Road and the Old Lucan Road, on a narrow strip of grass lined with trees and shrubs on the north side, and a low stone boundary wall at the roadside, with access / egress from the N4 and the Old Lucan Road
- Construction Compound 3: Located north of Palmerstown Bypass between the Kennelsfort Road Junction and the Oval Junction, with access / egress from the Palmerstown Bypass.
- Construction Compound 4: Located located within Liffey Gaels Park, south of Chapelizod Bypass, at the Con Colbert Road Junction, with access / egress from Con Colbert Road

A Construction Environmental Management Plan and a Construction Management Plan have been submitted with the application.

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).

#### **Environmental Impact Assessment Report (EIAR)**

An EIAR has been submitted as part of the application and 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.*



The scope of this report deals with demonstrating how the proposed overall development is in accordance with Dublin City Development Plan 2022-2028 policies and objectives.

## 2.1 Relevant Planning History

Significant planning applications along and adjacent to the route include:

- **SHD0011/22:** Permission granted by An Bord Pleanála for a strategic housing development on a site of c. 8.3 hectares located at the grounds of the former De La Salle National School, Ballyfermot Road, Ballyfermot, Dublin 10. Permission was sought for 927 no. apartments & duplex / triplex units ranging in height from 2 to 13 storeys. Condition 2 of the permission omitted the top floors of blocks F, G and H to not exceed eight storeys. As a result 62 units have been omitted from the proposal.
- **SHD ABP-306569-20:** Consented Development, on 28 May 2020, Permission granted for 321no. 'BTR' residential apartments, ancillary residents' amenity facilities, commercial office (c.3,698 sq m), retail (c.214 sq m) and café/restaurant (c.236 sq m), accommodated in 5no. blocks ranging from 8 to 13 storeys (c. 31,146 sq m) over ancillary basement area, and all associated and ancillary conservation, landscaping and site development works, at 42A Parkgate Street, Dublin 8.
- **SHD0021/21:** Permission granted A 30-storey residential building ('Block A') (c.14,364 sq m gfa), including residential, café/restaurant, replacement office use and ancillary accommodation and works, located in the eastern apex of the site subject of otherwise consented development under ABP-306569-20, at 42A Parkgate Street, Dublin 8.
- **SHD0023/21:** Permission granted for construction of a residential development comprising of 399 no. Build to Rent (BTR) apartments and associated ancillary residential uses including a retail unit at ground floor level, and ancillary and associated development, at Heuston South Quarter, St. John's Road West /Military Road, Kilmainham, Dublin 8.
- **2869/17:** Permission granted for the construction of 171 no. apartments at the Faulkner Industries Factory, Chapelizod Hill Road, Chapelizod, Dublin 20.

## 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 THE DUBLIN CITY DEVELOPMENT PLAN 2022-2028 – SUSTAINABLE MOVEMENT AND TRANSPORT & OTHER RELEVANT POLICIES**

The City Development Plan is the statutory planning context for the assessment of development proposals. 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.

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

**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 place making 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 Pedestrian Network** *To protect, improve and expand on the pedestrian network, linking key public buildings, shopping streets, public transport points and tourist and recreational attractions whilst ensuring accessibility for all, including people with mobility impairment and/or disabilities, older persons and people.*

**SMT12 Pedestrians and Public Realm** *To enhance the attractiveness and liveability of the City through the continued reallocation of space to pedestrians and public realm to provide a safe and comfortable street environment for pedestrians of all ages and abilities.*

**SMT14 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.*

**SMT19 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.*

**SMT22 Key Sustainable Transport Projects** *To support the expeditious delivery of key sustainable transport projects so as to provide an integrated public transport network with efficient interchange between transport modes, serving the existing future needs of the city and region and to support the integration of existing public transport infrastructure with other transport modes. In particular the following projects subject to environmental requirements and appropriate planning consents being obtained:*

- *DART+*
- *Metrolink from Charlemont to Swords*
- *Bus Connects Core Bus Corridor projects*
- *Delivery of Luas to Finglas*
- *Progress and delivery of Luas to Poolbeg and Lucan*

## **OTHER RELEVANT POLICIES**

There are a significant number of City Development Plan policies with relevance to the delivery of transport in the city, including:

**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 and the south and north Georgian cores 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 services and enhanced walking and cycling infrastructure.*

**QHSN11 15-Minute City** *To promote the realisation 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, intergenerational and accessible, safe and inclusive public spaces served by local services, amenities, sports facilities and sustainable modes of public and accessible transport where feasible.*

**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.*

### **2.2.2.1 DEVELOPMENT PLAN ; STRATEGIC DEVELOPMENT AND REGENERATION AREAS**

Strategic Development and Regeneration Areas (SDRAs) are identified in the Development Plan as areas capable of delivering significant quantum of homes and employment for the city. The proposed Core Bus Corridor passes within or alongside a number of SDRAs as identified in the City Development Plan. For each SDRA a series of guiding principles are set out in the plan. It is considered that the following SDRAs have objectives/principles of note for the proposed Core Bus Corridor:

#### **SDRA 7 – Heuston and Environs**

The boundary of this area encompasses a section of St Johns Road and adjoining lands. Focused on Heuston station, this SDRA has the capacity to become an exemplar of Transport Oriented Development. Among the guiding principles of relevance are:

- *To provide for the possibility of public realm and transport interchange improvements to be made to the lands to the front of Heuston Station having regard to its important location as a gateway into the city, its proximity to heavy rail and Luas stops and its placemaking potential on Victoria Quay. Opportunities relating to the Guinness Lands' role in placemaking and the public realm at this location should also be explored (see SDRA 15)*

- *To improve connectivity north-south across the River Liffey and St. John's Road through the Heuston lands to provide for road connectivity between Infirmary Road and Conyngham Road and also east-west between the Heuston lands and the Clancy Quay lands.*
- *To facilitate delivery of cycle routes identified in the NTA GDA Cycle Strategy.*
- *To facilitate connections between the cultural landmarks throughout the area – including the Royal Hospital Kilmainham, Kilmainham Gaol, Kilmainham Mill, National Museum Collins Barracks and the Phoenix Park.*
- *To implement the delivery of greening and biodiversity corridors identified in the Guiding Principles Map that that can also serve as high quality pedestrian and cycle routes and connect public open space provision.*
- *To facilitate the delivery of the permeability interventions identified on the Guiding Principles Map which seek to increase accessibility throughout the area and in particular, to the network of walking and cycling infrastructure that is emerging throughout the SDRA.*
- *To improve the pedestrian and cycle connection between Heuston Station and St. James' Hospital campus and to explore the potential of providing increased connectivity between Kilmainham Lane and Mount Brown/Old Kilmainham.*
- *To maximise the potential benefit of the BusConnects project to the Heuston area in terms of public realm improvements, green infrastructure and pedestrian and cycling infrastructure.*

Amongst the objectives set out, which include site briefs for sub-areas within the boundary of the SDRA, are the following which may be of particular relevance;

- 2 separate access and permeability interventions are identified on the relevant SDRA Map (Fig 13-7, Chapter 13). In this graphic, both these routes are illustrated crossing the carriageway of St Johns Road at separate points.
- A specific area around the main entrance to Heuston Station is identified for a public realm study. This is clearly illustrated.

#### **SDRA 15 – Liberties and Newmarket Square**

The boundary of this SDRA intersects with the proposed works at St Johns Road West near the Frank Sherwin Bridge and the front of Heuston Station. Among the guiding principles of relevance to the delivery of the Bus Connects proposal are:

- *To facilitate the creation of high quality cycle and walking routes that connect to existing and emerging public open space provision. These routes should be the subject of greening, where possible*
- *To provide for the possibility of urban realm and transport interchange improvements to be made in the north-western corner of the Guinness lands (north of Thomas St.) having regard to its important location as a gateway into the city, its proximity to heavy rail and Luas stops and its placemaking potential on Victoria Quay.*
- *To facilitate the delivery of the permeability interventions identified in the Guiding Principles Map which seek to increase accessibility throughout the area and in particular, to the identified network of walking and cycling infrastructure that is emerging throughout the SDRA.*

- *To maximise the potential benefit of the BusConnects project to the Liberties area in terms of public realm improvements, green infrastructure and pedestrian and cycling infrastructure.*

Please refer to related Fig. 13.15 which illustrates the location of the above-mentioned area for the public realm study, the core pedestrian spine, and also greening/cycling and pedestrian corridors. A new bridge across the River Liffey is also proposed close to the Frank Sherwin Bridge, extending from the South Quays over to Wolfe Tone Quay.

### **SDRA 9 – Emmet Road**

This SDRA is focused around the regeneration of the former St Michael’s Estate whilst also building on the Kilmainham Inchicore Development Strategy. Whilst the boundary of the SDRA does not overlap with the immediate area of proposed bus corridor works, it may be useful to consider the objectives set out, which include guiding principles for development including permeability interventions.

#### **2.2.2.2. Area Specific Plans**

The Kilmainham Inchicore Development Strategy (KIDS) is a non-statutory strategy funded by the Urban Regeneration and Development Fund (URDF) and is available online. Whilst most of the strategy area is located south of the proposed Lucan route, the norther boundary of the area is along the River Liffey.

**Objective CSO13** of the draft Development Plan states; *To seek funding under Call 3 of the URDF for the planning, detailed design and construction of the Kilmainham and Inchicore Development Strategy project.*

The KIDS identifies a number of potential projects including the enhancement of Kilmainham and Inchicore villages, the Camac River Greenway and also a Greening Strategy. It is noted that two potential pedestrian routes crossing the Lucan bus corridor have been set out in the strategy. These are located on the Con Colbert Road in the vicinity of the War Memorial Gardens. See relevant graphic on p 26/27.

### **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 2022-2028 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 Murrough 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 Liffey Estuary Upper 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 (2022-28) the area along the proposed route includes lands with the following zoning objectives: Z1 (residential), Z4 (district centres), Z5 (city centre), Z6 (employment/enterprise), Z9 (open space) and Z10 (mixed uses).

For the most part, the proposed scheme within the City Council area is situated on lands within the existing public road, in particular the Chapelizod Bypass where there is no specific zoning objective.



The corridor for the proposed Lucan to City Centre Bus Connects scheme traverses the Zone of Archaeological Constraint for Recorded Monument DU018-020 (Historic City) from Con Colbert Road and St John's Road West (Figure 1). This Recorded Monument 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. Further, the site in question is located within the Zone of Archaeological Interest in the current Dublin City Development (2022-28).

The Dublin City Development Plan 2022-2028 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, it 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'. 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 (2022-28) '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.

In general, the Proposed Scheme is supported by the high level policies in place the current Dublin City Development Plan 2022-2028

## **2.4.7 Environment and Transportation Department**

### **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
- 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 “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 in the Dublin City Council area is relative straightforward considering the road size available and that the scheme stops at the Heuston Station junction. However, the overall scheme is somewhat disappointing in that the reduction in private car journeys of 4% in the morning peak and 6 % in the evening peak is very low in comparison to other corridors. It is therefore hoped that during the detailed design stage of this scheme that this reduction can be increased by tightening up junctions and reducing general traffic lanes.

Notwithstanding this, the deployment of Camera based bus lane enforcement will need to have been rolled out on this corridor before the full benefit of the scheme in terms of bus journey reliability can be achieved. 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.

### **Specific Comments on locations**

Sheet 25 of 31

The incorrect speed limit sign is shown here on the inbound approach to the junction. It should be 60km for both bus and general traffic as it is at present.

Sheet of 28 of 31

The junction of the John's Road South Circular Road is a big complex junction where the shape of the junction is determined by the railway lines underneath. It is recommended that during the detail design stage options for tightening up the Johns Road inbound approach to the junction are explored such that two straight ahead general traffic lanes are merged to one prior to the junction. This will relieve some pressure on the junction and allow for better cycling and walking facilities.

Sheet 30 of 31

Junction of Military Road St John's Road West. The arrangement of speed signs at this location is confusing and it is not clear what exactly is being proposed and why.

Sheet 31 of 31

It should be noted that Bus Connects network redesign proposes bus and Tram use at this location so some signage which is shown on the drawing may have to change.

#### **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 DIVISIONS' COMMENTS**

This section of the Environment & Transportation report on the Lucan 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 Lucan 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.

In this regard, it is noted in the current scheme that at the Con Colbert/South Circular Road junction vehicular slip lanes are proposed to be removed and replaced with slip lanes for cyclists. The existing slip lanes have traffic signals which stop traffic for pedestrians to cross. However, it appears that the proposed cycle slip lanes will not be managed by signals, with yield markings instead proposed. Consideration should be given to additional measures aimed at ensuring pedestrian priority at this junction. The proposed layout of this particular junction is dealt with in more detail below.

It is important for An Bord Pleanála to note that existing indented car parking to the front of the Heuston South Quarter development on the south side of St. John's Road is located on lands which are not in the charge of Dublin City Council. These spaces are noted as 'informal' parking in the documentation which is incorrect. They are in fact private car parking spaces located on private land and not informal public on street parking spaces as suggested. The current scheme proposes the removal of the indented spaces and the provision of two EV charging spaces at this location. As this is proposed on private land, it is likely that this land will be required to be compulsorily purchased.

#### **Location Specific Comments**

##### Sheet 17

- Cycle track merges with footpath on the northern side of the R112 Lucan Road. Consideration should be given to re-routing the cycle track along the outside of the footpath to reduce likelihood of pedestrian/cyclist conflict.

##### Sheet 20

- Provision for the mobility impaired is not clear at this location. Commuters would need to negotiate a long and steep footpath (Chapelizod Hill Road) to access either of the Bus stops, which would likely also need retrofitting to make it accessible for all.

##### Sheet 25

- If cyclists on Con Colbert Road are required to push the signal call button in order to get a green signal, this does not confer any advantage to cyclists. It would allow more efficient movement for all users if cyclists could safely be accommodated via segregated facilities and the same signalling as regular traffic at this location given there is ample space available to do so. This should be considered.
- In this location it is unclear what advantage is gained in removing the left slip lane in favour of proposed layout. Cycle route and priority could more safely be conferred by routing it through the existing island between the left and right lanes (i.e. while maintaining the left slip lane).

##### Sheet 26

- Width concerns: It is not clear if there is enough width between boundaries and green median to achieve minimum lane widths.
- Further, it is doubtful that sufficient additional width is available to fit two proposed island bus stops.

- A staggered signalised pedestrian crossing is proposed east of the junction with Memorial Road. Straight through rather than staggered signalised pedestrian crossings are preferred as per DMURS. Given there is no existing crossing point here, it is not clear why a straight through crossing is not proposed.
- Design detail for the type of bus stop detailed on the R148 Con Colbert Road is required. It is not clear how pedestrian priority across the cycle tracks will be enforced for vulnerable users at this location and any such location throughout the scheme.

#### Sheet 27

- Width concerns: It is not clear if there is enough width between boundaries and green median to achieve minimum lane widths.

#### Sheet 28

- Width concerns: It is not clear if there is enough width between boundaries and green median to achieve minimum lane widths indicated in "typical cross section".
- The Con Colbert Road / South Circular Road / St John's Road West junction is very large and heavily trafficked and the proposed alterations are complicated and convoluted. There are several locations where pedestrians have to cross cycle tracks to get to crossing points due to lengthy deflections of the cycle track away from the carriageway (i.e. on the NW and SE corners of the junction). As a general rule, it is better to keep cycle tracks closer to the carriageway and any pedestrian crossing points outside cycle crossing points to reduce the need for pedestrians to cross cycle tracks without the aid of signals. Consideration should be given to reorienting some of the cycle tracks to reduce the requirements for footpaths to cross over cycle tracks and for all users to be controlled by signals wherever crossovers occur.
- Design detail for the type of bus stop detailed on Con Colbert Road is required. It is not clear how pedestrian priority across the cycle tracks will be enforced for vulnerable users at this location and any such location throughout the scheme.
- Width concerns: The width of the footpath at the north eastern junction between the South Circular Road and St Johns Road West is not clear. This looks to be extremely narrow. Consideration should be given to the reduction of the grass verge to allow for increased footpath space. This also looks to be the case at the south eastern junction of these roads.
- The proposed workings of the cycle track at the junction of Con Colbert Road and South Circular Road and specifically where the cycle lane crosses the carriageway at this junction are not clear. Specifically, whether this will be signalised and how cyclists will avoid conflict with vehicles.

#### Sheet 29

Width concerns: It is not clear if there is enough width between boundaries and green median to achieve minimum lane widths required.

#### Sheet 31

- As noted above, the land on the south side of St. John's Road where indented car parking currently exists is private and not in charge of Dublin City Council.

#### Sheet 31

- The pedestrian crossing points across St. John's Road West at the side and main entrances to Heuston Station are ramped. Given this crossing point is signalised (i.e. traffic controlled), it is not clear why a ramped crossing point proposed. Recent consultation with disability groups has informed DCC that level crossing points are generally preferred by users with accessibility of vision impairments over ramped crossings. This road is so heavily used by buses and large vehicles such that the service life of a ramp of this type will be greatly reduced from what is normally expected. As these ramps are also pedestrian crossing points, when the surface disimproves, this will reduce level of service for pedestrians and cyclists using the crossing point. Consideration should be given to removing the ramps and installing a dished level signalised crossing point instead.
- The purpose of the green space that is located in the centre of the footpath south of the bus stop on the southern side of St John's Road West is not clear. A bus shelter also looks to be located to the north of the green space. This bus shelter is very offline of the actual stop and should be located to the north of the cycle track on the bus stop island.
- Width concerns: At the two bus stops on St John's Road West, the footpath widths look to be extremely narrow in several locations. Given the large volumes of pedestrians that regularly use this area to enter and exit the station, footpath widths should be maximised at all locations in its immediate vicinity. Consideration should be given to reducing the size of the island and widths of the cycle tracks at the island (localised reduced width will also have the benefit of calming cyclist speed at what is a very busy location). The footpath width at the western side of the bus stop on the south of St John's Road West looks to be particularly narrow. The drawing also details that a heritage lamp post is due to be retained at this location possibly creating further width issues. The footpath width at western side of the bus stop on the north of St John's Road West looks to be particularly narrow.
- Width concerns: The footpath width to the north east of St John's Road to the west of St James's Brewery is not clear. The cycle track cuts through the island at the western side of the junction of St John's Road West and Victoria Quay. Consideration should be given to rerouting the cycle track along the outer edge of this island to avoid conflict with pedestrians on what is a busy route into and out of the station.

#### **2.4.7.4 Environmental Protection Division**

Dublin City Development Plan 2022-2028, 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.

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](http://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 be addressed:

1. Runoff management throughout the scheme should be evaluated on a case by case basis. How runoff is managed for the bridges in the area should be further explained.
2. While an increase in permeable areas is welcome in some sections, consideration should still be given to SuDS treatment of runoff whenever possible. Potential for tree pit use in areas such as (C75 – C125), (N125 to N170), (A7600 to A7775), (A8775 to A8850) and (A9100 to A9150) should be considered. Potential for Pond/Swale at D0 to D75.
3. While compensation of hardstand with softstand areas is welcomed, more detail is to be provided in the specific areas to clarify the workings throughout, this should be as noted in the legend with areas, flow control and allowable discharge rates etc. provided.
4. Drainage design throughout should be sense checked as there appears to be unnecessary elements included such as rodding eyes at C 180.
5. Design check are required around the bridges as some details are missing from the explanation and solution, particularly at B0 to B50 where gullies are described but none are shown on the drawing.
6. While the planting of new trees is welcomed what is the rationale of removing trees in the Hermitage golf club area only to replace them with new ones, have all options been explored for the selection of temporary works areas?
7. Design check around the discharge location at F20, Discharge IL for the proposed network is 47.73m where the existing invert level of SWMH1012339 is 48.12m.
8. Design check and explanation around the discharge to the existing network is required as location H 35 is unclear.
9. Clash detection and sense check around the location of proposed piped networks as clashes can occur as has occurred with DN375 at chainage A3030, manhole at chainage L4250 and proposed tree with DN225 at Chainage A8770.
10. Hardstand areas to be confirmed as proposed additional hardstand at chainage A3150 seems to be existing and not proposed which will affect the hardstand calculations.
11. Design check required at chainage A3700 as the design shows infrastructure outside the redline boundary.
12. Detailed Gully and swale design to be approved where additional required within the DCC boundaries.
13. Design check around the provision of new trees on HSE lands which could be potentially protected by cultural and Heritage status, chainage A9550 at Dr Steevens' Hospital.

#### **2.4.7.5 Water Framework Directive**

The proposed Lucan to City Centre Core Bus Corridor transverses two significant river catchments within the Dublin City Council administrative area, namely, the River Liffey and the River Camac. Albeit all waterbodies are subject to the European Union Water Framework Directive, both these waterbodies are specifically highlighted in the River Basin Management Plan (RBMP) as 'Priority Areas

for Action' with a requirement to protect and restore the river status to a 'good' designation or better, in addition to being protected under Article 4 of the WFD.

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, the Lucan to City Centre CBC proposal should not cause a deterioration of the status of any waterbody which it is contiguous with downstream and furthermore should not jeopardise the attainment of good ecological and good surface water chemical status, in accordance with our obligations. In particular, all surface water that discharges from the curtilages of the Lucan to City Centre CBC proposal into existing or proposed waterbodies should be intercepted and treated, using nature based solutions wherever possible. Where possible, drainage within the curtilage of this project should be segregated, and infrastructure for discharging surface water into existing surface water sewers should be implemented.

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](http://www.catchments.ie).

The developer shall provide an evidence-based assessment of the impact, if any, of the proposed scheme on the water quality status of both rivers within the curtilage of the proposed project, including both ecological and chemical status.

#### **2.4.8 Archaeology Section Observations**

The corridor for the proposed Lucan to City Centre Bus Connects scheme traverses the Zone of Archaeological Constraint for Recorded Monument DU018-020 (Historic City) from Con Colbert Road and St John's Road West (Figure 1). This Recorded Monument 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. Further, the site in question is located within the Zone of Archaeological Interest in the current Dublin City Development (2022-28).

#### **EIAR**

The archaeological and cultural heritage impacts of the construction phase and operational phase associated with the construction and operation of the Lucan to City Centre Core Bus Corridor Scheme are assessed in Chapter 15 of the Environmental Impact Assessment Report (EIAR), which was prepared by Lisa Courtney and Dr Claire Crowley of Courtney Deery Archaeology Ltd. This report provides a desk study of published and unpublished documentary and cartographic sources, supported by a field survey. The findings of the report are summarised below.

The proposed scheme will run eastwards from Ballyowen Road to the city centre, along the N4 and R148 dual carriageway roads, bypassing the historic village of Chapelizod. The proposed cycle track utilises parts of the old Lucan Road at Quarryvale and Palmerstown. The N4 road runs through the Liffey Valley and through the modern urban and suburban landscape that now masks the natural topography. The River Liffey and its catchment area attracted human activity and settlement from the prehistoric period onwards. The N4 road is said to follow an old route way between Dublin and the

west, the Slighe Mhór, one of the five principal highways mentioned in the Annals of the Four Masters in the first century AD. Parts of the bypassed older road, the old Lucan Road, still survive in places.

The proposed bus route passes through historic villages of Palmerstown and Chapelizod, both of which have medieval origins. The Kilmainham / Islandbridge area, through which this section of the Proposed Scheme travels, also has archaeological potential. The discovery of a Bronze Age cremation burial during excavations (Licence reference 02E0067) on Military Road indicates a prehistoric presence in Kilmainham. Archaeological discoveries from the nineteenth century onwards represent two pagan Viking Age cemeteries in the area between the River Liffey and River Camac. There is potential for further burials to survive beneath the existing road surfaces along Con Colbert Road and St John's Road West.

The archaeological potential along St John's Road West is heightened by the presence of an early medieval ecclesiastical monastic site at Bully's Acre (RMP DU018-020283) and St John's holy well. Maighneann probably founded a church on this site some time during the seventh century AD. Little is known about the historical Maighneann. He may have come from a noble family who lived near Armagh. He is described as being an abbot and a bishop. Kilmainham's strategic importance was that it marked an entry point into Viking Dublin. Near present-day South Circular Road there was a ford upstream from the main crossing at Áth Cliath, first referred to in 1192 as the fords of Kylmehauoc. It was probably near here that a high-king of Ireland, Niall Glúndub, was killed along with many of his men in a battle with Dublin Vikings in 919. The space between Dublin and Kilmainham was known as the 'green' (faithche) of Áth Cliath and it was here that the army of Brian Bóruma was encamped for an unsuccessful siege in the autumn of 1013, prior to the great battle at Clontarf in the following spring. Another unsuccessful siege was undertaken by the last high-king, Ruaidrí Ua Conchobair, and his allies in the summer of 1171, when Strongbow (the priory's founder a few years later) caught the Irish by surprise when bathing in the River Liffey.

Kilmainham is also the location of the official medieval residence of the Grand Prior of the Knights in Ireland. For almost 400 years (c.1174 to 1540) the Knights of St John of Jerusalem kept a priory with a headquarters in Kilmainham, Dublin. This monastic house, which lay approximately two kilometres west of the medieval city, was the main residence in Ireland of the Knights Hospitaller who came to Ireland at the time of the Anglo-Norman Invasion. The priory and headquarters were ruined during the Reformation and finally demolished at the end of the seventeenth century to build the Royal Hospital. By 1641 Kilmainham was occupied principally by an industrial populous, working the many mills along the River Camac. The grounds of Dr Steevens' Hospital (RMP DU018-020341) at the east end of St John's Road West are open to the road and the 18th century building is an attractive and intrinsic element of the historic character of this area.

The EIAR identifies seven archaeological heritage features on the Records of Monuments and Places / Sites and Monuments Record, five on the Dublin City Industrial Heritage Record, and five cultural heritage assets that have the potential to be impacted within the Proposed Scheme. The report shows that there is the potential for the discovery of previously unknown below ground archaeological features, materials and deposits along the Proposed Scheme including the installation of proposed construction compounds. Section 15.4.1 of the EIAR concludes that construction impacts on surviving archaeology and cultural heritage 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 be resolved by archaeological mitigation during the pre-construction phase and/or construction phase, in advance of the operational phase, through one or more of the following mitigations:

- 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 where archaeological features are 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. 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.

Archaeological monitoring (as defined in section 15.5.1) under licence will take place, where any preparatory ground-breaking or ground reduction works are required (as defined in section 15.4.1), at the following locations:

- Within the designated ZAP for the Historic City of Dublin (DU018-020) along Con Colbert Road and

St John's Road West, which is an area of particularly high archaeological potential associated with Viking, early medieval and medieval activity; and

- At the site of the 19th century gas house (DCIHR 18-10-025).

It is in these areas that there is potential for the proposed works to disturb intact archaeological layers and material. Licensed archaeological excavation, in full or in part, of any identified archaeological remains (preservation by record) or preservation in situ is proposed in the EIAR.

Further to the recommendations in the EIAR, this office also recommends that monitoring be undertaken in the vicinity of Recorded Monument DU018-029 (House) where road widening is proposed, as well during the removal of a strip of land to the front of the landscaped grounds at the site of Steeven's Hospital DU18-020 (Hospital).

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

#### **Recommended Conditions**

These are set out in the Appendix below.

#### **2.4.9 Conservation Section Observations**

##### **Introduction**

This assessment has been carried out by the Conservation Section in the context of the Dublin City Development Plan 2022 – 2028, 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 2022 – 2028**

Chapter 11 – Built Heritage and Archaeology, 11.1 Introduction, *'It is recognised that the city's built heritage contributes significantly to the collective memory of its communities and to the richness and diversity of its urban fabric. It is key to the city's character, identity and authenticity and vital social, cultural, and economic asset for the development of the city.'*

*The city's historic buildings, streetscape villages, Georgian terraces and squares, Victorian and Edwardian architecture, industrial heritage, institutional landmarks, modernist buildings of the 20<sup>th</sup> century, urban core and the Medieval City, together with its upstanding monuments and buried archaeology contribute to its local distinctiveness and help create a strong sense of place for citizens and visitors to the city and its neighbourhoods.'*

**Section 11.5.1** Curtilage of a Protected Structure 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.'*

*It is the Policy of Dublin City Council:*

**BHA2:** *Regarding Development of Protected Structures:*

*'That development will conserve and enhance Protected Structures and their curtilage and will:*

- b) Protect structures included on the RPS from any works that would negatively impact their special character and appearance.*
- e) Ensure that the form and structural integrity of the protected structure is retained in any development and ensure that new development does not adversely impact the curtilage or the special character of the Protected Structure.*
- h) Protect and retain important elements of built heritage including historic gardens, stone walls, entrance gates and piers and any other associated curtilage features.*
- i) Ensure historic landscapes, gardens and trees (in good condition) associated with the protected structures are protected from inappropriate development.'*

**Section 11.5.2** Architectural Conservation Areas and Conservation Areas states: *'The Planning and Development Act, 2000 (as amended), provides the legislative basis for the protection of Architectural Conservation Areas (ACAs). Under the Act, an ACA is defined as a place, area, group of structures or townscape that is of special architectural, historical, archaeological, artistic, cultural, scientific, technical, social interest or value or contributes to the appreciation of protected structures.*

*Architectural Conservation Areas (ACAs) are designated in recognition of their special interest or unique historic and architectural character and important contribution to the heritage of the city. This character is often derived from the cumulative impact of the area's buildings, their setting, landscape and other locally important features which developed gradually over time...*

*The protected status afforded by inclusion in an ACA only applies to the exterior of structures and features of the streetscape.'*

*It is the Policy of Dublin City Council:*

**BHA7:** *Regarding Architectural Conservation Areas:*

*a) 'To protect the special interest and character of all areas which have been designated Architectural Conservation Areas (ACA). Development within or affecting an ACA 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 shall not harm buildings, spaces, original street patterns, archaeological sites, historic boundaries or other features, which contribute positively to the special interest of the ACA.'*

*'All trees which contribute to the character and appearance of an Architectural Conservation Area, in the public realm, will be safeguarded, except where the tree is a threat to public safety, prevents universal access or requires removal to protect other specimens from disease.'*

*It is the Policy of Dublin City Council:*

**BHA8:** *Regarding Demolition in an ACA:*

*'There is a presumption against the demolition or substantial loss of a structure that positively contributes to the character of the ACA except in exceptional circumstances where such loss would also contribute to a significant public benefit.'*

**Section 11.5.3 Z2 and Z8 Zonings and Re-Hatched Conservation Areas**

*'The Z8 Georgian Conservation Areas, Z2 Residential Conservation Areas and red-lined Conservation Areas are extensive throughout the city. Whilst these areas do not have a statutory basis in the same manner as protected structures or ACAs, they are recognised as areas that have conservation merit and importance and warrant protection through zoning and policy application.*

*...The special interest/value of Conservation Areas lies in the historic and architectural interest and the design and scale of these areas. Therefore, all of these areas require special care in terms of*

development proposals. The City Council will encourage development which enhances the setting and character of Conservation Areas.

As with Architectural Conservation Areas, there is a general presumption against the development which would involve the loss of a building of conservation or historic merit within the Conservation Areas or that contributes to the overall setting, character and streetscape of the Conservation Area. Such proposals will require detailed justification from a viability, heritage and sustainability perspective.'

It is the Policy of Dublin City Council:

**BHA9:** Regarding Conservation Areas, enhancement opportunities may include:

'3. Improvement of open spaces and wider public realm and reinstatement of historic routes and characteristic plot patterns.'

It is the Policy of Dublin City Council:

**BHA10:** Regarding Demolition in a Conservation Area:

'There is a presumption against the demolition or substantial loss of a structure that positively contributes to the character of the Conservation Area, except in exceptional circumstances where such loss would also contribute to a significant public benefit.'

It is the Policy of Dublin City Council:

**BHA15:** Regarding Twentieth Century Buildings and Structures:

a) 'To encourage the appropriate development of exemplar twentieth century buildings and structures to ensure their character is not compromised.'

It is the Policy of Dublin City Council:

**BHA16:** Regarding Industrial Heritage:

a) 'To have regard to the city's industrial heritage and Dublin City Industrial Heritage Record (DCHIR) in the preparation of Local Area Plans and the assessment of planning applications...'

### **Section 11.5.3 Protection of Historic Ground Surfaces, Street Furniture and Public Realm**

'Dublin is fortunate to still retain impressive areas of historic street surfaces such as granite kerbing, granite pavement flags and granite and/or diorite setts, mainly but not entirely situated in the city centre. These along with other important historic features in the public realm such as milestones, city ward stones, street furniture, water troughs, post boxes, lampposts and railings make a special contribution to our built heritage. These items are often an integral part of the urban landscape or province significant historic references which greatly contribute to the character of an area, especially where they complement the architectural features of protected structures, Architectural Conservation Areas and Z2, Z8 and Red-Hatched Conservation Areas.'

It is the Policy of Dublin City Council:

**BHA18:** Regarding Historic Ground Surfaces:

a) 'To protect, conserve and retain in situ historic elements of significance in the public realm including milestones, jostle stones, city ward stones, bollards, coal hole covers, gratings, boot scrapers, cast iron basement lights, street skylights and prisms, water troughs, street furniture, post boxes, lampposts, railings and historic ground surfaces including kerbs, pavement flags and setts and to promote conservation best practice and high standards for design, materials and workmanship in public realm improvements within areas of historic character, having regard to the national Advice Series on 'Paving: The Conservation of Historic Ground Surfaces (2015).'

It is the Policy of Dublin City Council:

**BHA24: Regarding Reuse and Refurbishment of Historic Buildings:**

*'Dublin City Council will positively encourage and facilitate the careful refurbishment of the historic built environment for sustainable and economically viable uses and support the implementation of the National Policy on Architecture as it relates to historic buildings, streetscapes, towns and villages, by ensuring the delivery of high quality architecture and quality place-making and by demonstrating best practice in the care and maintenance of historic properties in public ownership.'*

*It is the Policy of Dublin City Council:*

**BHA26: Regarding Archaeological Heritage:**

*(5) 'To preserve known burial grounds and disused historic graveyards. Where disturbance of ancient or historic human remains is unavoidable, they will be excavated according to best archaeological practice and reburied or permanently curated.'*

*(6) Preserve the character, setting and amenity of upstanding and below ground town wall defences.'*

**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 2022-2028.

*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...'*

The Conservation Section recommends 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 2022-2028 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 settings
- Buildings and other structures (post boxes/milestones etc.) and historic landscapes included on 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 Development Plan 2022-2028, which aims to *'protect and / or improve the amenities of residential conservation areas'*
- Lands zoned Z8 in the Dublin City Development Plan 2022-2028, 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 EIA and the proposed mitigation measures across the scheme is generally welcomed.

Appendix A16.2 Inventory of Architectural Heritage Sites provides a detailed written and photographic record, importance rating and sensitivity rating for all protected structures, NIAH-recorded structures, designed landscapes, unprotected structures of built heritage significance, street furniture, paving and surface treatments. The Conservation Section finds that the record is comprehensive and accurately describes the quality and status of the heritage structures along the proposed route.

Non-Technical Summary Section 8. Architectural Heritage describes general mitigation for potential temporary and permanent impacts to the built heritage. The document states:

*'The mitigation measures proposed to avoid or reduce negative impacts on architectural heritage during the Construction Phase include:*

- *Appropriate recording, protection, removal, storage and reinstatement of boundaries and street furniture; and*
- *The retention, protection where required, or replacement of trees along the Proposed Scheme.*

*Once the mitigation measures have been applied, there will be no significant residual impacts on the architectural heritage resource as a result of the Construction and Operational Phase of the Proposed Scheme.'*

Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric, Section 3.2.1 provides a statement on protection of architectural heritage structures and features during works. *'Some architectural heritage features will require protection during the course of works, where there is potential for damage of sensitive fabric during the course of works proposed in close proximity to them. Historic or sensitive fabric will be recorded in position prior to the commencement of construction works, protected and monitored for the duration. Appropriate protections will be determined depending on the nature of the fabric and the construction activities. Protective measures will include cordoning off as appropriate and/or the provision of protective wrapping or temporary hoardings, or boxing off. More specific protections are outlined in the relevant sections of this methodology.'*

In general, the Conservation Section agrees with the above findings regarding mitigation and protection measures, however it notes that the proposed truncation of the garden to the north of Dr Steevens' hospital to facilitate the bus corridor development will have a permanent negative impact on the character of this Nationally significant building. It also notes the negative visual impact of the proposed bus shelters to the north of the Dr Steevens' Hospital and to the southern boundary of the Irish War Memorial Gardens. These elements of the proposed development have not been adequately assessed within the impact assessment.

#### Corrections Identified to Labelling/Representation in Documents & Maps Submitted

Some elements of Architectural Heritage have not been correctly represented or have been incorrectly labelled in the text documents and/or on the supporting mapping:

Drawing Title: BCIDE-JAC-ENV\_AH-0006\_X\_00-DR-GG-0012 Lucan to City Centre Core Bus Corridor Scheme Figure 16.1 Architectural Heritage, Sheet 12 to 14. The record number CBC000CBTH013 has been used twice.

#### Key Impacts

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

- Protected Structures (& proposed) and their setting
  - a) Several Protected Structures are included on the subject map sheets. These structures are located on or adjacent to the route boundary. All Protected Structures in close proximity to construction works are to be adequately protected and all proximate works are to be supervised by a conservation professional.
  - b) In addition to 'Regionally' rated protected structures, some highly significant and sensitive protected structures are located on or adjacent to the proposed bus corridor route. These include the Irish War Memorial Gardens, Dr Steevens' Hospital and Heuston Station which are of National importance, and the Royal Hospital Kilmainham which is of International importance. The importance rating of each protected structure has been accurately noted within the Architectural Heritage chapter of the EIAR (Appendix 16).
  - c) Irish War Memorial Gardens (DCC RPS 2028/ NIAH 50080001). The route passes the Irish War Memorial Gardens, Islandbridge which is a protected structure of National importance. The memorial park garden was designed by Sir Edwin Lutyns in 1930 to commemorate those who fought and fell in the First World War.

A cycle track and bus lane will run alongside the southern boundary. During construction, the non-original boundary wall may be damaged and should be protected. Furthermore, a proposed bus stop with shelter is to be located along the southern boundary of the site. The shelter is considered to be too close to the entrance gates and will impact visually on the

southern boundary of the designed landscape. The significance of this impact has not been adequately commented upon within the impact assessment of the EIA.

An alternative location to the east should be considered for the shelter. The design of any new shelter in this location should be carefully considered with the aim of minimising potential negative visual impacts, to support the reduction of visual clutter and to improve legibility of the designed landscape which is a protected structure.

The formal entrance gates (DCC RPS 2028/ NIAH 50080013) to the Irish War Memorial Gardens on west side of South Circular Road are located directly adjacent to the development site. During construction stage there is the potential for damage to the wrought-iron gates and railings, wrought and cast-iron piers, and the ashlar granite piers and plinth walls. Adequate protection of the protected structure must be ensured.

- d) Clancy Barracks (DCC RPS 1851) including Officer's House (NIAH 50080025), dated 1889; and Guard House (NIAH 50080026). Clancy barracks, which is Regionally rated, lies adjacent to a section of the R11 South Circular Road within the development boundary. The site is set back from the roadway and will be neutrally impacted by the development.
- e) Royal Hospital Kilmainham (DCC RPS 5244). The bus corridor route will pass alongside the northern boundary of the grounds of the Royal Hospital Kilmainham which is a building of International importance. Within the grounds of the Royal Hospital is a formal, quadrangular walled garden and garden building (NIAH 50080068/DU018-020255-), built c.1740, which are of Regional importance. The garden and garden building lie within in close proximity to the northern boundary wall of the Hospital grounds. The walled garden and garden building will be neutrally impacted by the proposed route.
- f) Three enclosed burial grounds of Regional importance are located at the northwest corner of the grounds of the Royal Hospital Kilmainham within a site formerly known as Bully's Acre (NIAH 50080051), (NIAH 50080052), and (NIAH 50080054/ DU018-020283-). The route passes the enclosed graveyards, which are bounded by random-coursed stone walls. During construction, there is potential for the boundary walls to be damaged. The boundary walls to the road must be protected during construction phase.
- g) Heuston Station Terminal Building and Offices (DCC RPS 7576), Train Shed of 1846 (NIAH 50080031); Railway Station now Booking Hall and Restaurant of 1845 (NIAH 50080036); Railway Station c.1850 (NIAH 50080035). The station, formerly known as Kingsbridge, was built as a terminus of the GS&WR to designs by Sancton Wood. The historic railway station, which is of National importance, lies at the east end of the proposed bus corridor route. The proposed development site will be located directly to the south of the historic train station. During construction, the station building could be damaged. Adequate protection must be provided to the building fabric of the south elevation to mitigate potential physical damage during development works.
- h) Dr Steevens' Hospital, Steevens' Lane (DCC RPS 7840/ DU018-020341/ NIAH 580080083) is a former hospital building of National importance. Designed by Surveyor General Thomas Burgh in the Palladian idiom, its construction commenced 1718 with the hospital opening in 1733.

Since the 18<sup>th</sup> century, Dr Steevens' Hospital has enjoyed a close physical and historical relationship with St Patrick's University Hospital to the south (DCC RPS 856/ NIAH 50080086), the former Royal Hospital Infirmary (NIAH 50080082), and the former Medical Officer's Residence (NIAH 50080081) to the west. Its principal northern elevation faces Heuston Station to the north on the opposite side of St Johns Road West.

The northern garden of Dr Steevens' Hospital is the site of a 19<sup>th</sup>-century fever hospital and nurses' home, neither of which are extant. The garden comprises neat lawns that are

intersected by rectilinear pathways laid out on a symmetrical plan to complement the formality of the building's façade. The garden is an integral part of the formal setting to the 'Nationally' important building. The open green space is also an important buffer between the historic hospital and the heavily trafficked St John's Road West.

The bus corridor route intends to take a piece of ground from the north garden which forms part of the curtilage of the Protected Structure and is set within a Conservation Area. Land will be acquired on a permanent basis from the Health Service Executive, with additional lands taken temporarily during construction phase. The scheme will significantly shorten the garden and result in a permanent and serious negative impact to the character and setting of Dr Steevens' Hospital. The significance of this impact has not been adequately commented upon within the impact assessment of the EIAR.

The proposed bus shelter to the north of the façade of Dr Steevens' Hospital will visually interrupt the view towards the garden and notable building facade from the north. A shelter should not be located in this position. This impact has not been adequately commented upon within the impact assessment of the EIAR.

- i) St James' Gate Brewery (DCC RPS 8203/ NIAH 50080349) lies to the east end of the proposed route. The site's western boundary wall, built from stone c.1875, will mark the development boundary line. During construction, the stone wall could be damaged. Adequate protection must be provided to mitigate potential physical damage during development works.
- Buildings and other non-Protected Structures (post boxes/milestones etc.) and historic landscapes included on the National Inventory of Architectural Heritage (NIAH)
    - a) There are a number of additional sites recorded by the NIAH on the subject map sheets. There are no direct adverse impacts on these structures apparent, however there may be indirect impacts as a result of the proposed works during construction phase of the project. NIAH structures/sites in close proximity to construction works are to be adequately protected and all proximate works are to be supervised by a conservation professional.
    - b) 1-4 St Laurence's Cottages, Chapelizod Hill Road (NIAH 50080360). The Local rated site comprises a terrace of early 20<sup>th</sup>-century social housing on the east side of the road. The group of four single-story yellow and red brick houses with granite dressings are attributed by the NIAH to architect Thomas Joseph Byrne who developed schemes for similar housing in Rathfarnham and Crumlin under South Dublin Rural District Council. Each house is set within its own plot with front and rear gardens. The front boundary which comprises simple wrought-iron railings and pedestrian gates could be damaged during construction and must be adequately protected.
    - c) The existing boundary wall to the southwest of 1-4 St Laurence's Cottage's is to be replaced. Development works could damage the railings of the terrace. Adequate protection of the ironwork railings must be provided.
    - d) The proposed route provides for the development of ramps and steps directly to the south of 1-4 St Laurence's Cottages, Chapelizod Hill Road. The development will require the removal of an area of mature trees on the wooded embankment that rises southwards to the bypass above. This removal of trees and construction of steps and ramps will permanently alter the setting of the terrace within Chapelizod ACA.
    - e) Cast-iron post box (NIAH 50080037) is to be removed from its current position to accommodate a proposed cycle lane. The cast-iron post box should be relocated to a suitable position outside of Heuston Station. A method statement for removal, storage and protection, moving and reinstallation of the post box must be prepared by a conservation professional.
  - Architectural Conservation Areas and Conservation Areas

- The southwest side of Chapelizod & Environs ACA lies between the River Liffey and Chapelizod Bypass. Part of Chapelizod Hill Road is situated within the ACA boundary. The proposed development will require the construction of a series of ramps and steps on ground that is presently planted with trees. The green area contributes to the setting of terraced houses on Chapel Hill Road and the adjacent Knockmaree Apartments. It also acts as a natural buffer between the residential area and Chapelizod Bypass. The felling of existing trees and removal of planting to accommodate the installation of new steps and ramps will permanently alter the area's visual character.
  - Temporary land take during construction phase will impact the southwest boundary of the ACA.
  - During construction phase, the widening of the ST02 road bridge may have a direct physical or vibrational impacts on the terraced houses of Chapelizod Hill Road if adequate protection is not provided.
  - The Chapelizod Bypass route runs alongside the southwest boundary of the red hatched CA38 Liffey Valley Conservation Area lying to the north of Chapelizod Bypass. Chapelizod ACA, the War Memorial Gardens, Royal Hospital Kilmainham, Dr Steevens' Hospital and Heuston Station lie within the conservation area.
- Potential impacts on historic paving and kerbing, historic street furniture and lamp standards and other features.

*Lamp Posts:*

- Seven cast-iron lamp posts have been identified at the east end of the route. Four of these are located on the south side of Heuston Station and may date from c.1910 according to the DCIHR. Three cast iron lamp posts are located to the north of Dr Steevens' Hospital and may be modern replicas according to the DCIHR. Two of the historic lamp posts on the south side of Heuston Station are to be relocated. There is the potential for all heritage lamp posts to be damaged during development of the route. Exact details of the proposed relocation of the historic lamp standards must be provided. The supervision of the work by a conservation professional will be required.
- Cast-iron post box (NIAH 50080037) located to the south of Heuston Station is to be relocated. The supervision of the work by a conservation professional will be required. Exact details of the proposed relocation of the lamp standard must be provided.

*Other Street Furniture/Finishes:*

- Cast-iron electrical cabinets bearing the city crest are located at St John's Road West (DCIHR 18 10 007). A further cast-iron electrical cabinet is located at Dr Steevens' Hospital. There is the potential for the cast-iron electrical cabinets to be damaged during development of the route. The supervision of the work by a conservation professional will be required.
- Proposed Tree Removal and Provision of New Trees
    - Permanent land take to facilitate the ramps and steps will require the removal of existing trees and planting on the Chapelizod Bypass embankments.
    - Temporary land take to facilitate the A5650 ramps and steps will require the removal of existing trees and planting on the Chapelizod Bypass embankments.
  - Boundary Treatments
    - The Conservation Section notes that where works may require the removal of existing roadside boundary walls, railings, entrances gates and hedgerows, together with areas of existing garden plantings garden trees, paving and garden features, new boundary walls,

railings, entrances gates and hedgerows to match existing shall be reinstated at setback location, pending agreement on more detailed design with the Planning Authority and having regard to the provisions of the Architectural Heritage Protection Guidelines for Planning authorities (2011) and the relevant DHLGH Advice Series publication(s).

- **Cycle Lanes**
  - The Conservation Section request that where the cycle ways are located in close proximity to Protected Structures and within Architectural Conservation Areas generally, that an alternative high quality cycle lane surface is provided in-lieu of red tarmacadam.
- **New Traffic Semaphore & Signage**
  - The proposed new bus lanes and routes may require additional traffic semaphores and signage.
  - Careful consideration shall 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.
- **Proposed Bus Stops**
  - The location, form and materials of the proposed bus stops / shelters / information posts has the potential to impact upon the character and setting of Protected Structures and Conservation Areas.
  - Mitigation will be required to mitigate the visual impact of bus stops / shelters / information posts sited near or fronting Protected Structures and Architectural Conservation Areas.
  - The treatment of new kerbing and paving associated with the provision of bus stops / shelters / information boards should be appropriate in material and colour to the location, particularly where adjacent sections of historic stone paving and kerbing exist in situ.

#### 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

- (a) Ballyfermot Retail Centre (Sheet 11 & 13)
- (b) O'Hogan Road (Sheet 15)
- (c) Grattan Crescent (Sheet 20)
- (d) Emmet Road Village Centre (Sheet 21)
- (e) The 'Obelisk fountain area' at the junction of James's Street and Bow Lane West (Sheet 25)
- (f) Cornmarket at the junction of High Street, Bridge Street Upper and Thomas Street (Sheet 28)

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 along Thomas Street (Sheet 27), improvements could be proposed outside Saint Catherine's Church (a protected structure) on the southside of the street, where the cycletrack slip lane to Bridgefoot Street could be removed to improve the setting of the church and provide increased space for pedestrians. Along the northside of the street, improvements could be proposed outside the National College of Art and Design, and the Church of Saints Augustine and John the Baptist, (both protected structures) by relocating the start of the bus lane further east past the junction with John's Street West.

#### **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 Special Planning Control Schemes (SPCS) 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.

#### 2.4.11 Parks Department Comments

1. Agreement on taking in charge of landscape components of the proposals by DCC Park Services will require liaison and agreement on planting details prior to implementation. Amendments to planting proposals may be required to comply with Park Services contract maintenance requirements.
2. All landscape components of the proposals will require contract maintenance for a minimum of 3 years following completion of the works or any phases. Landscape areas agreed to be taken in charge will require full completion of the 3 year maintenance period and rectification of any defects or loss of planting.
3. Clarity is required on the proposed quantity of compensatory street tree planting along the route in comparison to the proposed removal of existing street trees. If appropriate compensatory planting falls below the loss of existing street trees then other forms of compensation shall be agreed with Park Services.
4. The implementation of the arboricultural and landscape proposals will require the professional input of Arboriculturists and Landscape Architects for the full duration of project work contracts. Construction details for components of the project that will be taken in charge shall be agreed at design stage with Park Services.
5. Tree protection measures for all existing trees shall be put in place prior to the commencement of development or phases of development. Where existing trees require remedial measures to alleviate risk to the users of the completed development, then these shall be completed by the project proponent. The project proponent shall be required to fund tree remedial works or tree replacement works where existing trees retained decline or fail within 5 years of the completion of the project or project phases.

#### 2.5 Conclusion

The proposed Lucan 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 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 2022-2028. 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 1**

### **Recommendations/Conditions**

#### **Agreed conditions - Between Dublin City Council and the National Transport Authority**

1. That a comprehensive agreement is put in place between DCC and the NTA regarding how the corridor is to be handed over to the NTA and its contractors, what pre-inspection and recording of the corridor is necessary and how the corridor is to be maintained during construction activities and by whom. The agreement shall also address the handback process, the treatment of all relevant records treated and how the corridor is to be accepted back by DCC following construction.
2. Following handback, a separate agreement shall be put in place between DCC and the NTA regarding the costs of maintenance of the corridor as a high quality public transport corridor with agreed levels of performance and how the performance of the public transport corridor is not eroded in the future.
3. All relevant DCC departments involved with the development of the Scheme shall be consulted during the detailed design development process for the Scheme and the NTA shall incorporate the requirements of the DCC departments into the final detailed design of the Scheme.

#### **Department Recommendations/ Conditions**

##### **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 DCC specification and only the relevant DCC maintenance contractor shall be permitted to undertake electrical or system control work on either the existing or new traffic signals.

##### **Roads Division Standard Conditions**

###### **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:**

2. 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.
3. 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.
4. Drawings clearly demarcating private landings shall submitted as part of detailed design development of approved scheme.

###### **Design:**

5. 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.
6. All Construction works shall comply with the "Construction Standards for Roads and

Street Works in Dublin City Council".

7. 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.

8. 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.

9. Pedestrian priority shall be ensured throughout the Scheme design through signage and physical design measures where appropriate.

10. 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.

11. The Scheme shall ensure that principles of universal design are adhered to and accessibility requirements are met throughout the Scheme.

12. 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.

13. 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.

14. All signage and road markings to comply with the *Traffic Signs Manual*.

#### **Reinstatement:**

15. 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.

16. 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.

17. 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*.

18. 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:**

19. 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.

20. 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*.

21. 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.

22. 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.

23. 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**

24. 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.

## **Recommendations/Conditions - 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 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.

## **Recommendations/Conditions – 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](http://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 runoff 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 would be preferable in instances where this could be achieved. The developer shall explore all opportunities to segregate the surface

water from the combined drainage system. 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 Lucan 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 not jeopardise the attainment of good ecological and 'good' water chemical status for the Rivers Liffey and Camac, The 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.

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 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**

1. Archaeological monitoring in the vicinity of Recorded Monument DU018-029 (House) where road widening is proposed, as well during the removal of a strip of land to the front of the landscaped grounds at the site of Steeven's Hospital DU18-020 (Hospital).

2. NTA to appoint a Project Archaeologist as a member of the NTA project team to oversee all archaeological aspects of the project from inception to completion. The Project Archaeologist will manage archaeological aspects of the project and input on, inter alia:

- project planning and design,
- scheduling of archaeological mitigation,
- the development of programmes,
- the development of construction and procurement strategies,
- the preparation of contract documentation,
- the appointment of competent consultant archaeologists,
- advance works, construction and potential operational issues.

3. The Project Archaeologist shall ensure that the process of identifying the potential impact the project on archaeology is dealt with by a competent archaeologist.
4. The Project Archaeologist shall oversee the archaeological operations carried out by the contractor's archaeological consultant.
5. The Project Archaeologist shall ensure that appropriate investigation is carried out, where reasonably practicable, prior to the commencement of construction to identify both the known and unknown archaeology that may be impacted by the project. Where this is not reasonably practicable, an appropriate archaeological strategy to mitigate the known or potential archaeological impacts to be developed in consultation with the Minister.
6. The Project Archaeologist shall consider whether the archaeology can be preserved in situ within the confines of the project. Where preservation in situ cannot reasonably be achieved, allow sufficient time to preserve by record all archaeological remains that are impacted by the project to a level that is acceptable to the Minister.
7. The NTA shall provide the necessary funding to fulfil the post-excavation and reporting requirement(s) of the project to a standard that is acceptable to the Minister.
8. The Project Archaeologist shall ensure the publication and/or dissemination, as appropriate, the archaeological results of the project.
9. The Project Archaeologist shall copy Dublin City Council Archaeology Section with all Section 26 method statements and any reports arising and provide regular updates on finds and mitigation throughout the delivery of the scheme through to completion.
10. The primary archaeological paper archive for all archaeological site investigations to be prepared and deposited with the Dublin City Archaeological Archives within a timeframe to be agreed with the planning authority unless otherwise agreed with the Minister.

## **Conservation**

### **Recommendations/Conditions**

1. 1. To safeguard the special architectural interest of affected 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 recommend that all works shall be designed and supervised by an expert in architectural conservation in accordance with the provisions (outlined above) of the Dublin City Development Plan 2022-2028, 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/structures on the NIAH and DCIHR, and structures and features in Architectural Conservation Areas (ACAs) across the Bus Connects route shall be submitted by the conservation professional for the written approval of the Planning Authority.

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, other historic buildings and features, an Architectural Conservation Area or Conservation Area.
6. All works shall be carried out in accordance with best conservation practice, 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 reinstatement.
7. All existing original architectural heritage features, in the vicinity of the works shall be protected during the course of all phases of construction works.
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) The lawn to the north of the façade of Dr Steevens' Hospital is a significant, integral component of this 'Nationally' important Protected Structure. The proposed substantial and permanent land take at this location would seriously injure the sensitive character and setting of this 18<sup>th</sup> century building and its surviving landscaped setting. The project shall be revised at this location to ensure the protection and retention of the garden, with details of the revision to be submitted for the written agreement of the Planning Authority.
  - b) The proposal to provide bus shelters proximate to the Dr Steevens' Hospital and the National War Memorial Gardens will seriously injure the character and setting of these 'Nationally' rated protected structures. Alternative locations for the proposed bus shelters to the north of Dr Stevens Hospital and to the south of the Irish War Memorial Gardens should be presented for the written agreement of the Planning Authority
  - c) It is proposed that a cast-iron post box and two heritage lamp posts are to be relocated as part of the scheme. The precise new location of these street furniture items and detailed method statements for the protection, removal, transporting and reinstallation of these items shall be submitted for the written agreement of the Planning Authority.
  - d) Consideration should be given to the rationalisation of all signage across the route to reduce visual clutter.
  - e) Where cycle ways are located in close proximity to Protected Structures and within Architectural Conservation Areas generally, consideration shall 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 identified at

- (a) Chapelizod Hill, new pedestrian access stairs & ramp (Sheet 20)
- (b) St Johns Rd West, Interface at Heuston Station & Dr Steevens' Hospital (Sheet 31)
- (c) Palmerstown Village, Old Lucan Rd & Kennelsforth Rd Lower (Sheet 14 & 15).

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.

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

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.

#### **Parks Division Recommended Conditions**

1. Agreement on taking in charge of landscape components of the proposals by DCC Park Services will require liaison and agreement on planting details prior to implementation. Amendments to planting proposals may be required to comply with Park Services contract maintenance requirements.
2. All landscape components of the proposals will require contract maintenance for a minimum of 3 years following completion of the works or any phases. Landscape areas agreed to be taken in charge will require full completion of the 3 year maintenance period and rectification of any defects or loss of planting.

3. Tree planting proposals are welcome within the proposals however the constraints of overhead and underground services on this planting and other constraints, such as planting close to existing boundaries should be realistically assessed.

4. Clarity is required on the proposed quantity of compensatory street tree planting along the route in comparison to the proposed removal of existing street trees. If appropriate compensatory planting falls below the loss of existing street trees then other forms of compensation shall be agreed with Park Services.

5. The implementation of the arboricultural and landscape proposals will require the professional input of Arboriculturists and Landscape Architects for the full duration of project work contracts. Construction details for components of the project that will be taken in charge shall be agreed at design stage with Park Services.

6. Tree protection measures for all existing trees shall be put in place prior to the commencement of development or phases of development. Where existing trees require remedial measures to alleviate risk to the users of the completed development, then these shall be completed by the project proponent. The project proponent shall be required to fund tree remedial works or tree replacement works where existing trees retained decline or fail within 5 years of the completion of the project or project phases.

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Richard Shakespeare  
Assistant Chief Executive  
Dublin City Council

10/10/10