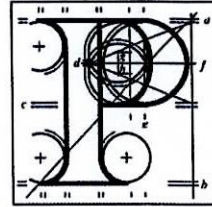


Our Case Number: ABP-314942-22



**An
Bord
Pleanála**

Dublin City Council North
Planning & Development
Civic Offices
Block 4, Floor 3
Wood Quay
Dublin 8

Date: 21 March 2023

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

Dear Sir / Madam,

An Bord Pleanála has received your recent submission 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
Direct Line: 01-8737247

HA03

Tel	Tel	(01) 858 8100
Glaio Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Niamh Thornton

From: Fiona Brady <fiona.brady@dublincity.ie>
Sent: Monday 20 March 2023 09:38
To: SIDS
Cc: Deirdre Scully
Subject: DCC's Observtions re BusConnects Lucan to City Centre ABP-314942-22
Attachments: 20230314151248979.pdf; Liffey Valley to City Centre Report.docx

Dear Ms Chiforescu,

On foot of the correspondence received from An Bord Pleanála on 9 March last in relation to the above, please find attached Dublin City Council's observations on Lucan to City Centre Bus Connects project.

Please can you confirm receipt of email at your convenience.

Kind regards
Fiona Brady
On behalf of Deirdre Scully

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

From: Doina Chiforescu <d.chiforescu@pleanala.ie>
Sent: 15 March 2023 15:04
To: Brian Keaney <brian.keaney@dublincity.ie>
Cc: Nichola Meehan <N.Meehan@pleanala.ie>
Subject: RE: Correspondence attached from ABP relating to BusConnects Lucan to City Centre

Dear Brian,

As per letter issued by the Board on the 9th of March, 2023 you are requested to make observations in relation to the proposed development, on the application and not on the observations at this time. The Board received a late submission from DCC and now you are invited to make observations on the application.

I hope this answered your query.

Kind regards,

Doina

Smaoinigh ar an timpeallacht sula ndéanann tú an ríomhphost seo a phriontáil. Please consider the Environment before printing this mail.

**Written Submission from Dublin City
Council Chief Executive**

to An Bord Pleanala

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

**BusConnects Dublin – Liffey Valley to City Centre Core Bus Corridor Scheme
An Bord Pleanala Ref. ABP-314942-22**

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Appendix 1 – Recommended Conditions

1.0 Liffey Valley to City Centre Core Bus Corridor Scheme

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 Liffey Valley to City Centre Core Bus Corridor Scheme together with all ancillary and consequential works for the purpose of facilitating public transport.

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 Liffey Valley to City Centre Core Bus Corridor Scheme and the potential effects of the proposed development on the environment and the proper planning and sustainable development of the area.

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

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

2.0 Description of the Proposed Development

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

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

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

The proposed route is divided into three sections as follows:

- Section 1: Liffey Valley to Le Fanu Road;
- Section 2: Le Fanu Road to Sarsfield Road; and
- Section 3: Sarsfield Road to City Centre.

The proposed route begins at the Fonthill Road where it will tie into the new bus interchange facility on the northern boundary of the Liffey Valley Shopping Centre, which is in the functional area of South Dublin County Council. The Proposed Scheme will continue along the Fonthill road to the west and south of Liffey Valley Shopping Centre in a southerly direction towards Coldcut Road. From here it will join the R833 Coldcut Road and continue to the bridge over the M50, subsequently turning onto the R833 Ballyfermot Road. The Proposed Scheme will then travel through Ballyfermot Village and continues onto the Sarsfield Road, whilst city bound general traffic is diverted via Le Fanu Road and Kylemore Road back to Ballyfermot Road.

The Proposed Scheme will continue along Ballyfermot Road and Sarsfield Road, turning right at the junction with Con Colbert Road before turning right again onto Grattan Crescent. At the intersection of Grattan Crescent and Emmet Road the Proposed Scheme will travel along Emmet Road, Old Kilmainham, Mount Brown and James's Street. From here the Proposed Scheme will join Thomas Street, Cornmarket and High Street to the junction with Nicholas Street and Winetavern Street, where it will join the existing traffic management regime in the City Centre.

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 comprises the following:

- 9.2km (two-way) of bus priority infrastructure and traffic management;
- 13.3km (total both directions) of cycling infrastructure and facilities;
- Provision of new/refurbished pedestrian facilities and footpaths along the scheme and associated ancillary works;
- Provision of 27 junction upgrades including conversion of three existing large roundabouts to signalised junctions and associated ancillary works;
- Provision of 69 new/refurbished raised table side entry facilities;
- Reconfiguration of existing bus stops resulting in 52 new bus stop facilities;
- Public Realm works including landscaping, planting, street furniture, street lighting, retaining walls, boundary walls and sustainable urban drainage (SUDs) measures;
- Roads associated earthworks including excavation of unacceptable material, importation of material, temporary storage of materials;
- Provision of road pavement, signing, lining and ancillary works;
- Provision of gates, fencing and boundary treatment works;

- • Provision of new and diverted drainage infrastructure;
- • Diversion of utilities and services including associated ancillary works; and
- • Construction of accommodation works including boundary treatment and ancillary grading and landscaping works; and
- All ancillary and consequential works associated therewith.

The Proposed Scheme will make significant improvements to pedestrian and cycling facilities and to bus priority. Some of the key changes that will be made to the existing corridor as a result of the Proposed Scheme are the following:

- The number of pedestrian signal crossings will increase by 44% from 71 to 102 as a result of the Proposed Scheme;
- The proportion of segregated cycle facilities will increase from 12% on the existing corridor to 72% on the Proposed Scheme;
- The proportion of the route having bus priority measures will increase from 22% on the existing corridor to 100% on the Proposed Scheme.

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

- Ballyfermot Road
- Sarsfield Road,
- Grattan Crescent
- Emmet Road
- Old Kilmainham
- Mount Brown
- James's Street

The boundary of the proposed scheme includes areas of land-take to facilitate the construction and operational phases of the development.

The majority of the proposed scheme passes through the outer suburbs of the city including the historic villages of Ballyfermot and Inchicore.

The construction phase for the proposed scheme is anticipated to take approximately 30 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: Fonthill Road;
- Construction Compound 2: Coldcut Road; and
- Construction Compound 3: 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).

The EIAR notes that the aim of the proposed scheme is to provide improved walking, cycling and bus infrastructure on this key access corridor in the Dublin region, which will enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor.

The outcomes achieved from delivering the Proposed Scheme, as set out in the EIAR, will be:

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

The scope of this report deals with demonstrating how the proposed overall development is in accordance with Dublin City Development Plan 2016-2022 policies and objectives.

2.1 Relevant Planning History

Significant planning applications along and adjacent to the route include:

- **SHD0011/22:** Decision pending 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, Construction of 927 no. apartments & duplex / triplex units comprised of 325 no. one bed, 538 no. two bed, & 64 no. three bed dwellings, 1 no. commercial unit and 1 no. retail / café unit in 8 no. blocks (Blocks A-H) ranging in height from 2 to 13 storeys.
- St Michael's Estate, Emmet Road: DCC have plans for a major regeneration of the St Michaels estate. The project is currently undergoing consultation.
- **4588/22,** current planning application for a mixed used development known as Guinness Quarter on the existing Guinness Brewery Lands Guinness Brewery lands to the South of James Street and Thomas Street, Dublin 8.
- **3209/19:** Permission granted for at Grand Canal Harbour, Grand Canal Place, Dublin 8, for a mixed use development in five blocks, over basement. Block 3/4 shall divide into two blocks at upper levels. The residential component shall be 'Build to Rent' scheme of 550 no. residential units.

- **SHD0029/20:** Permission granted at former Steelworks Site for construction of 189 no. Build-to-Rent apartments (comprising 151 no. one-bed apartments, 34 no. two-bed apartments and 4 no. three-bed apartments) in 3 no. three to eight storey blocks.

2.2 Policy Context

2.2.1 Regional Level

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

The principal aim of the RSES is to support the implementation of Project Ireland 2040 by providing a long-term strategic planning and economic framework for the development of the Region. The RSES is underpinned by three key principles, i.e. placemaking, climate action and sustainable economic opportunity and growth. Sixteen Regional Strategic Outcomes (RSOs) are set out which are broadly aligned with the National Strategic Outcomes of the NPF. The RSES includes a more detailed Dublin Metropolitan Area Strategic Plan (MASP) which identifies strategic development and employment areas for population and employment growth, in addition to more generalised consolidation and re-intensification of infill, brownfield and underutilised lands within Dublin City and its suburbs.

The Dublin MASP sets out a list of key transport infrastructure investments in the Metropolitan Area as supported by National policy (RPO 8.7, RPO 8.9) to promote mobility management, sustainable transport use and the delivery of bus projects including Core Bus Corridors and Regional Bus Corridors. The cycling objectives include delivery of the cycle network set out in the NTA's Greater Dublin Area Cycle Network Plan and investment priorities for cycleways. Overall, the RSES supports the delivery of key sustainable transport projects including BusConnects as set out in RPO 5.2.

2.2.2. Citywide Level

2.2.2.1 Dublin City Development Plan 2016-2022

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

Relevant policies include:

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

***MT3** To support and facilitate the development of an integrated public transport network with*

efficient interchange between transport modes, serving the existing and future needs of the city in association with relevant transport providers, agencies and stakeholders.

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

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

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

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

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

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

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

2.2.2.1.1 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 Development Plan. It is considered that the following SDRAs have objectives/principles of note for the proposed Core Bus Corridor:

SDRA 4 Park West/Cherry Orchard

This SDRA requires enhanced connectivity between the SDRA area and Ballyfermot Road. It is noted that the proposed arrangement provides for the retention of the existing junction arrangements.

It is noted that the SDRA has been superseded by the Parkwest Cherry Orchard Local Area Plan.

SDRA 9 St Michael's Estate

The SDRA is focussed on the regeneration of the former St. Michael's Estate although enhanced connectivity through the site to Emmet Road and Inchicore village are indicated. The following guiding principles are noted:

- The development will complement the regeneration of Inchicore by encouraging a natural extension of the village centre eastwards along Emmet Road; the development will provide strong connections between the site and the functions of the village centre, for which a local environmental improvements plan is proposed
- The important heritage features on, and adjoining, the site, shall be respected and highlighted by urban design with particular regard to the tourism, heritage, community and amenity value of assets such as St Michael's Church, Richmond Barracks, Goldenbridge Cemetery and the Grand Canal

As with the consideration of the SDRAs in the draft Development Plan in section 1.7 below, it is considered that the function of Emmet Road as a key pedestrian and cycling spine is of note to the proposed Bus Connects project.

SDRA 15 St James's Hospital Campus and Environs

The vision for this SDRA is to develop St James's Hospital and its environs as a health and innovation hub. One of the key guiding principles is:

1. Making connections: To improve connections between key institutions, city assets and transport interchanges, both in physical and non-physical terms. This includes creating a more accessible and permeable hospital campus.

A number of site-specific objectives have been identified to help deliver this overall vision including:

1. James's Street gateway: To carry out public realm improvements and promote the development of medical research and development functions and the use of vacant sites on James's Street at the northern entrance to the hospital.

It is considered that the Proposed Scheme can support increased connectivity in line with the SDRA but that the role that such corridors can play in terms of the provision of green infrastructure and improved pedestrian and cycle measures should be maximised.

SDRA 16 Liberties and Newmarket Square

This SDRA includes the following guiding principles/objectives of relevance to the proposed Core Bus Corridor:

8. To promote the principles of good urban design including improving connectivity and enhancing the legibility and permeability of the Liberties in relation to the wider cityscape.

9. To create a high-quality network of public spaces, parks and streets.

10. To promote sustainable modes of transport by making them convenient and attractive, including walking and cycling routes, and by facilitating the provision of public transport infrastructure and optimising its use.

12. To encourage environmental sustainability by improving biodiversity, facilitating recycling, and minimising the use of non-renewable resources, including energy.

Having regard to the principles above, it is considered that the opportunity to maximise cycling and pedestrian activity needs to be emphasised. Likewise, the opportunity to provide green infrastructure to support biodiversity and sustainability principles should also be pursued along the proposed route.

2.2.2.1.2 Area Specific Plans

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

The Proposed Scheme runs through part of the lands covered by the Parkwest Cherry Orchard Local Area Plan (LAP), namely part of the Ballyfermot Road external to Cherry Orchard Hospital.

The LAP identifies a Strategic Vehicular Route at the junction with Ballyfermot Road (Figures 43 & 44 of the LAP). This junction should be safeguarded into the future and it is noted that the proposed development appears to provide for its continued use as a strategic vehicular route. The access/junction is also identified as part of the Green Infrastructure Network in the LAP (Figure 46). The proposed development does not appear to provide for any greening at this location but rather reduces the existing open space/green infrastructure provision. It is considered that the applicant should be requested to examine whether increased greening proposals can be provided at this junction.

2.2.2.2 Draft Dublin City Development Plan 2022-2028

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

The core strategy set out in the draft plan is to develop a low carbon, sustainable and climate resilient capital city, where people will choose to live, work, experience city living, invest and socialise. The vision for the city is that, within the next ten years, it will have an established international reputation as a city region that is one of Europe's most sustainable, dynamic and resourceful. It is envisaged that the city will be beautiful, compact city, with a distinct character and a vibrant culture, and with a

diverse, green and innovation-based economy. The city will be a socially inclusive city of urban neighbourhoods based on the principle of the 15-minute city, which allows people's daily requirements to be reached within 15 minutes by foot, bicycle or public transport, and is therefore compact. All development will be connected by exemplary public transport, cycling and walking systems.

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

Relevant policies include the following:

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

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

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

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

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

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

SMT4 Integration of Public Transport Services and Development: To support and encourage intensification and mixed-use development along public transport corridors and to ensure the

integration of high quality permeability links and public realm in tandem with the delivery of public transport services, to create attractive, liveable and high quality urban places.

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

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

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

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

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

2.2.2.2.1 DRAFT AREA SPECIFIC PLANS

Kilmainham Inchicore Development Strategy (KIDS)

The Kilmainham Inchicore Development Strategy (KIDS) is a non-statutory strategy funded by the Urban Regeneration and Development Fund (URDF). The KIDS identifies a number of potential projects including the enhancement of Kilmainham and Inchicore villages, the Camac River Greenway and a Greening Strategy.

Objective CSO13 of the draft Development Plan relates to the KIDS and is:

CSO13 Kilmainham and Inchicore Development Strategy Projects To seek funding under Call 3 of the URDF for the planning, detailed design and construction of the Kilmainham and In-chicore Development Strategy project.

The implementation of the KIDS will improve connections between Kilmainham and Inchicore villages, strengthen the quality of the public realm and enhance the landscape character of the area which in turn will act as a catalyst for the urban regeneration of the area.

The KIDS identifies five high level projects for the area:

1. Enhancement of Kilmainham Village.
2. Enhancement of Inchicore Village.

3. The Camac River Greenway.
4. Military Quarter.
5. Greening Strategy.

The following projects are considered of significance for the subject application:

Enhancement of Kilmainham Village

This project includes, inter alia, the identification of a civic building and public space at the crossroads between Emmet Road/Old Kilmainham Road and South Circular Road as well as the regeneration of Kilmainham Mill. Improved pedestrian connectivity via the Camac Greenway is also a key element of this project. It is recommended that the applicant examine whether the proposed layouts can incorporate increased footpath widths at the landing point of the potential Camac Greenway on South Circular Road.

Enhancement of Inchicore Village

This project aims to enhance the village to deliver improved public realm and the promotion of active travel. Having regard to the fact that such public realm enhancement have yet to be designed up, it is considered that the proposed Core Bus Corridor will need to be incorporated into same. It is noted that the reduction in vehicular routes in the village would appear to provide scope for public realm enhancements into the future.

Military Quarter

A key element of the KIDS is to improve connections between key military heritage assets in the Kilmainham Inchicore wider area to create a "Military Quarter". In association with the consideration of the Strategic Development and Regeneration Areas set out below and the cultural policies of the draft Development Plan set out above, this will involve, amongst other things, the creation of improved pedestrian and cycle connectivity, new signage and wayfinding between the major heritage assets in the area including the Royal Hospital Kilmainham, Bully's Acre, Kilmainham Gaol, Richmond Barracks, Goldenbridge Cemetery and the War Memorial Gardens.

A key route in this will be Old Kilmainham Road/Emmet Road. It is considered that the subject application does not provide for an improvement in the walking or cycling environment on this key route. It is considered therefore that the applicant should be requested to examine whether cycling and walking provision can be maximised.

DRAFT STRATEGIC DEVELOPMENT AND REGENERATION AREAS

As with the current Development Plan, Strategic Development and Regeneration Areas (SDRAs) are identified in the draft 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 draft Dublin City Development Plan. For each SDRA a series of guiding principles are set out in the plan.

SDRA 7 – Heuston and Environs

This SDRA, focused on Heuston station, has the capacity to become an exemplar of Transport Oriented Development. Among the guiding principles of relevance to the delivery of the Bus Connects proposal are:

- 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.

Old Kilmainham Road/Mount Brown/James's Street is identified as a greening, cycle and pedestrian corridor in the SDRA. The proposed arrangement for Old Kilmainham does not provide for any greening or improved cycle and pedestrian connections and it is considered that the applicant should be requested to examine whether the proposed development could provide for the provision of greening measures and an improvement in the cycle and pedestrian connections.

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. The SDRA seeks to provide a strategic vision for the redevelopment of these regeneration sites and to improve their connections to the villages of Inchicore and Kilmainham. Among the guiding principles of relevance to the delivery of the Bus Connects proposal are:

- To encourage development that reinforces the village cores of Inchicore and Kilmainham, connected by Emmet Road, as the central spine of the area.
- To undertake public realm studies for both Kilmainham and Inchicore villages.
- To promote the undertaking of a Greening Strategy for the wider Kilmainham-Inchicore area.

- To create a linked network of greening corridors including walkways, biodiversity corridors, cycleways and parks, as identified in the Guiding Principles Map. These should be attractive, welcoming and accessible, feed into a wider network and connect up to the local schools in the area.
- To facilitate the delivery of the permeability interventions identified in the Guiding Principles Map, which seek to improve accessibility throughout the area.
- To encourage development that enhances the vitality of the emerging network of walking and cycling infrastructure.
- To maximise the potential benefit of the BusConnects project to the SDRA area in terms of public realm improvements, green infrastructure and pedestrian and cycling infrastructure.

In the SDRA, Emmet Road is identified as a greening, cycle and pedestrian corridor/core pedestrian spine. The proposed design for Emmet Road in the application does not provide for any greening or improved cycle and pedestrian connections. It is recommended that the applicant examines whether this issue can be addressed as part of the proposed design.

SDRA 14 – St. James Medical Campus & Environs

This SDRA focusses on a vision to develop St. James's Hospital campus as a leading health and innovation hub. Public Realm improvements are indicated for the St. James's Street gateway at the hospital. It appears that the proposed development does not provide for any significant changes at this location.

SDRA 15 – Liberties and Newmarket Square

Among the guiding principles of relevance to the delivery of the Bus Connects proposal are:

- Improve the quality of the Liberties' main thoroughfares – Cork St., Thomas/James's St., Francis St., Meath St. and Marrowbone Lane, through improvements to the public realm and greening strategies and by establishing frontage of appropriate character and scale in relation to the street width
- 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 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.

Thomas Street/High Street is identified as a greening, cycle and pedestrian corridor/core pedestrian spine. The proposed design does not appear to provide for any greening or improved pedestrian

connections, having regard to footpath widths. It is recommended that the applicant examines whether this issue can be addressed as part of the proposed design.

EMMET ROAD PROJECT

Dublin City Council is currently engaged in developing a regeneration scheme at Emmet Road on the former St. Michael's Estate lands. A planning application is expected to be lodged in autumn 2022 for the development of circa 570 dwellings, a supermarket, a library and community centre and a crèche along with associated infrastructure. It is anticipated that this will greatly alter the character of the Emmet Road area as well as Inchicore village, including the addition of circa 1,100-1,400 new residents. A large public plaza is proposed to be located at the northern end of the site, abutting Emmet Road. The aforementioned facilities to be located on-site are also expected to attract patronage from across the wider Inchicore/Kilmainham/Drimnagh area. In light of this increase in population the principle of a quicker and more frequent bus service is welcomed.

The Bus Connects project proposes to make a number of interventions which will impact upon the proposed Emmet Road Regeneration Project. The proposed moving of the signalised crossing to the junction with St Vincent Street West is welcomed, as it will improve the pedestrian crossing of St Vincent Street West for those moving along the south side of Emmet Road. However, it is suggested that this junction should accommodate a raised crossing, as has been proposed for the other nearby junctions along Emmet Road. The proposed signalised junction will also facilitate the movement of service vehicles required for the future supermarket, which is to be accessed from St Vincent Street West.

The Bus Connects project also proposes to relocate the bus stop currently located to the north of the Emmet Road site (on the south side of the street) westwards along Emmet Road towards Inchicore Village. While this will lengthen pedestrian journeys for those using the Emmet Road site, it is acknowledged that the existing arrangement whereby two bus stops are located 100-150m apart is less than efficient. It is also acknowledged that relocating the bus stop further west towards the centre of Inchicore village will bring broader benefits to the village. On balance, it is considered that maintaining the existing stop in front of St Michael's Church means that future patrons of the Emmet Road site will still have a bus stop within a reasonable walking distance.

2.3 Departmental Reports

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

- Environment and Transportation Department – including comments from Traffic, Roads, Public Lighting and Environmental Protection Divisions
- Archaeology Division
- Conservation Section
- City Architects Division

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

2.4 Planning Assessment:

2.4.1 Planning Policy

In terms of Regional Policy, as set out in Section 2.2.1, the proposed scheme is supported by the RSES. BusConnects (of which the Proposed Scheme is a part) is identified as a key infrastructure project which will support the regional growth strategy for the Eastern and Midlands Region including the Dublin MASP area. It is considered that the proposed scheme will contribute and support continued improved integration of transport with land use planning and the delivery of improved high-capacity Core Bus Corridors will enable and support the delivery of both residential and economic development opportunities, facilitating the sustainable growth of Dublin City and its metropolitan area. The RSES not only seeks an improved and enhanced bus network but also places cycling at the core of its transport objectives.

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

2.4.2 Environmental Impact Assessment Report (EIAR)

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

2.4.3 Natura 2000

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

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

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

Special Areas of Conservation (SAC)

Rye Water Valley/Carton SAC	6.65km
North Dublin Bay SAC	6.03km

South Dublin Bay SAC	4.62km
Baldoyle Bay SAC	10.14km
Malahide Estuary SAC	12.2 km
Howth Head SAC	11.72km
Rockabill to Dalkey Island SAC	12.19km
Lambay Island SAC	21.28km
Glenasmole Valley SAC	11.33km
Wicklow Mountains SAC	11.97km

Special Protection Areas (SPAs)

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

The NIS notes that the proposed scheme does not overlap with any European sites, although it is hydrologically connected to Dublin Bay via the 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 (2016-22) the area along the proposed route includes lands with the following zoning objectives: Z1 (residential), Z2 (residential conservation areas), Z3

(neighbourhood centre), Z4 (district centres), Z5 (city centre), Z6 (employment/enterprise), Z9 (open space) and Z15 (institutional and community).

For the most part, the proposed scheme is situated on lands within the existing public road and pedestrian area where there is no specific zoning objective. The proposed route passes through a zone of Archaeological Constraint for Recorded Monument DU018-020 (Historic City) from the junction of Emmet Road and South Circular Road to the eastern termination of the scheme at High Street. 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 (2016-22) and Draft Dublin City Development Plan 2023.

The proposal also includes works within the architectural conservation areas (ACAs) of Grattan Crescent Park Conservation Area and Thomas Street and Environs ACA. The impact on the conservation areas is assessed in the report by the Conservation Division.

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

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

Overall, 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'. There will also be some impacts on residential amenity as a result of loss of areas of front garden and boundary. These must be balanced against the overall benefits of the proposed development. Once complete, the proposed scheme will create attractive, functional and accessible places for people alongside the core bus and cycle facilities which will enhance the amenities of the area.

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

The City Council supports the improvement of public transport and cycling which will allow for higher density development, thereby creating a more sustainable interaction between land-use and transport. Chapter 8 of the current Dublin City Development Plan (2016-22) 'Movement and Transport' sets out the Council's policies and objectives which are relevant to Bus Connects, which include, *inter alia*, policies in relation to sustainable transportation, modal shift and supporting and facilitating the development of an integrated public transport network, with efficient interchange between transport modes, serving the existing and future needs of the city.

The Proposed Scheme will help to achieve the strategic objectives envisaged in the forthcoming Dublin City Development Plan 2022-2028 pertaining to: compact and sustainable urban growth; sustainable mobility and permeability; and placemaking, while significantly contributing towards climate action. While the Proposed Scheme is supported, it is important that the Core Bus Corridor adequately addresses conservation impacts along the route as well as the potential to improve green infrastructure and pedestrian and cycle connectivity.

In general, the Proposed Scheme is supported by the high level policies in place in both the current Dublin City Development Plan 2016-2022 and the draft Dublin City Development Plan. There are a number of specific issues relating to the Parkwest Cherry Orchard LAP, proposed SDRAs and KIDS that the applicant could be requested to address as set out above.

2.4.7 Environment and Transportation Department

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

2.4.7.1 General Comments

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

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

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

The commitment by the NTA within the BusConnects project to increase the level of priority afforded

to the bus service is very much welcomed. The introduction of, for the most part, separated and segregated cycle ways is again welcomed as providing the opportunities:

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

2.4.7.2 Traffic Division

The Traffic Section is supportive of the integrated sustainable transport proposals and recognises the significant improvements that they will bring in terms of safe cycling measures and in enabling an efficient public transportation service along these routes.

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

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

The modelling work which was carried out on the corridor using Vissim attempted to mimic the real life operation of a full corridor management system using an adaptive traffic control system and allows for a firm basis for how the corridor can be evaluated and to determine its benefits.

In practice DCC will utilise its adaptive traffic control system SCATS to undertake the required traffic management on the corridor to enable the public transport corridor to perform as per the requirements. Because of the use of a real world system which has multiple inputs from the Bus AVL system, cycle and pedestrian detection as well as vehicle actuated sensors, the signals will be running multiple sets of timings across the day rather than a fixed set of timings and the use of this technology will allow improved corridor operation.

The design of this scheme is complex, particularly as it moves into the city centre and through the urban village areas however the modelled results of the scheme as designed will increase public transport use, decrease car traffic, increase cycling and significantly improve the conditions of pedestrians along the route. Along Thomas Street inbound it reduces traffic by -865 p.c.u.s in the morning peak and similar in the evening peak, which allows for some reconfiguration of the junction at Cornmarket High Street, and allowing the Cornmarket Thomas Street area to be perceived as less of a through route for vehicles. The proposed reconfiguration should however attempt to reuse as much as possible of the existing public realm scheme and also will have to be carefully discussed with

the relevant divisions during the agreed detailed design process so that an agreed solution can be implemented.

In order to achieve the level of change in modal share set out in the EIAR the scheme does remove some existing parking and loading bays in order to provide the required levels of priority for buses and the provision of safe cycle facilities. The loss of this parking and loading, while appropriate in the delivery of this high quality public transport scheme, nevertheless does mean that deliveries to local businesses especially will need to be addressed in the day to day management of the scheme.

The ongoing vitality of the city centre, especially the Thomas Street area, and the urban villages along the route is very important to the future of the city. The NTA and DCC will have to work through on a case by case basis the needs and requirements of businesses for loading and servicing as well as the requirements for accessible parking and access. New delivery times, use of different vehicles and off line locations will have to be explored to provide the correct balance.

The use of Bus Gates along portions of this route to compensate for the lack of continuous bus lanes by using dynamic traffic management will be challenging and require careful installation and monitoring to ensure the scheme benefits are being achieved. In addition the changes in traffic flow on Mount Brown and surrounding areas will have to be carefully managed. 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.

Project Delivery Mechanism

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

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

2.4.7.3 Roads Division

This section of the Environment & Transportation report on the Liffey Valley Bus Connects Scheme has been prepared by the Roads Divisions. 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 Divisions are generally supportive of the scheme and its intention to improve bus and cycling provision. Having reviewed the application documentation, the divisions 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 divisions have 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 and in an attached appendix 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 Liffey Valley 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.

Regarding the current scheme before An Bord Pleanála, a document detailing comments on a sheet by sheet basis as numbered in the application drawings booklet is appended to this report. This approach is considered appropriate having regard to the particular complexity of this scheme deriving from its route through urban villages and city centre streets which warrants detailed commentary. Notwithstanding, some important items arising from the documentation review are addressed below.

Regarding the scheme proposals for the Thomas Street/Cornmarket area, detailed engineering comments are included in the attached appendix. However, it is considered important to highlight the following for An Bord Pleanála's information and consideration. Cornmarket was reconstructed as a high quality public realm scheme in 2008 after wide ranging consultation and consideration of a wide range of legitimate needs. These included, but are not limited to: significant archaeology, accessibility and mobility, Dublin, wayfinding, legitimate traffic needs (road user hierarchy, warrants, signalling, loading, rationalised parking, etc.), commercial needs, complex underground utility networks, public safety, public amenity of the plaza, public lighting arrangements, sight lines and power supply for Christmas tree, surface gradients and drainage, etc. The revised scheme layout would decommission the Cornmarket Environmental Improvement Works scheme entirely. The proposed alterations would require a challenging detailed design that will require costly compromises, major archaeological works, major utility diversion works, and challenging traffic management during construction, all while de-prioritising cyclists and buses by diverting them from their East-West desire line. While the 6 traffic lanes and 2 pedestrian refuge islands (on Bridge Street Upper arm) can be rationalised, and the reclaimed road space could add to the Public Realm on the northern footpath, retaining the existing East-West corridor as the main route, and Bridge Street Upper as the side street, would serve the majority of road users and the public realm/heritage better.

An Bord Pleanála's attention is drawn to comments specifically relating to Thomas Street, in particular the request that the scheme be revisited to provide for additional kerbside loading space having regard to the intensity of commercial activity reliant on same.

An Bord Pleanála's attention is also drawn to comments relating to James's Street, in particular the layout of the Mount Argus and James's Street St. James's hospital access junctions, the existing layouts for which will be altered by the National Children's Hospital development.

ROADS DIVISIONS' LOCATION SPECIFIC COMMENTS

Sheet 8

At Cherry Orchard hospital a portion of the access road is included within the red line. The access road is actually private and not taken in charge by Dublin City Council. Consideration should be given to the retention of the bus stops directly outside of the Primary Care Centre.

Sheet 9

Ramped crossing points are not favoured across bus routes as the ramps tend to have short service lives due to the impact of many buses travelling over them. Damaged ramps reduce the quality of crossing for pedestrians and ride quality for bus passengers. Recent consultation has suggested that mobility and visually impaired users are not in favour of ramped crossing points and prefer traditional dishings. Consideration should be given to the removal of ramps along the scheme. If traffic calming is needed, speed cushions are preferable.

Sheet 10

Regarding the site beside Ballyfermot Civic Centre (Pure Pharmacy, Koffee and Kale, Staffords Funeral Home), it is not clear if access to the car park for the funeral home and commercial units is being retained from Ballyfermot Road and potential subsequent impact on access to and use of the car park. The funeral home in particular will require direct access for hearses.

The removal of parallel roads which currently facilitate on street parking is noted. However, it is also noted that some properties have no driveways and may be reliant on the on street parking.

Consideration should be given to the removal of the raised table and ramped crossing as per sheet 9 comments. The presence of cycle lanes negates need for a single raised crossing area, as pedestrians will not be able to use the whole table to cross due to cyclists using the central portion.

Sheet 11

Access and parking at the commercial units at junction (Paddy Power and Haven pharmacy) of Ballyfermot and Le Fanu Roads is proposed to be removed. It is not clear what revised arrangements will be put in place for these commercial units.

Removal of a substantial amount of parking and loading space is proposed. Angled parking is proposed to replace parallel parking but it is not clear where loading for this long stretch of commercial units will be accommodated. Is the parallel parking area sufficient to accommodate loading for such a long

stretch of commercial units? Is depth of parking sufficient to accommodate large service vehicles (pub and centra)?

Footpath along Le Fanu Road (southern section) outside Molloy's disappears at one point. A continuous footpath should be provided.

Sheet 13

Kylemore Road - Cognisance should be taken of permitted development including access arrangements for site on west side of Kylemore Road.

Consideration should be given to the removal of the raised table and ramped crossing as per sheet 9 comments. It is not clear why a traffic calming feature at a signalised junction is warranted.

Sheet 14

Vehicular access would appear to be removed from Ballyfermot Road to Ballyfermot Resource Centre. However the alternative access arrangements are not clear.

Cognisance should be taken of the live substantial residential application including access arrangements for de la Salle site.

Sheet 15

O'Hogan Road is proposed as a cul de sac. The rationale for this is not clear nor is it clear whether sufficient turning space has been provided.

Sheet 16

Regarding the bus stop proposed in front of access to St. Laurence's Glen – c. 36 car parking spaces. It is not clear if the access is intended to be retained and function with the bus stop in place.

It is not clear what is proposed regarding private landing/parking area for United Tyres and adjacent properties. Drawings are not clear in this regard, in particular if car parking is to be removed.

Regarding the existing commercial properties and service station on the south side of Sarsfield, it is not clear what the impact on access and parking arrangements will be.

Sheet 17

Regarding the temporary acquisition of the car park at Ruby Finnegan's and Happy Ice Cream, it is unclear how the pub could function without this area specifically for loading; large keg vehicles.

Sheet 18

It is not clear what exactly is being proposed regarding the street layout below the rail way bridge, in particular whether the footpath is being widened and whether the guard rail is being retained.

The pedestrian crossing of Sarsfield Road has been pushed away from the desire line.

Sheet 19

Removal of signalised pedestrian crossing from the western side of Memorial Road/Con Colbert Road junction considered undesirable as this is the direct desire line to Memorial Park entrance.

Sheet 20

Proposed Emmet Road development includes for plaza at Emmet Road frontage with supermarket and community uses. Tie in with this development is important. All parking and kerbside loading

potential is removed in the scheme from the front of the Emmet Road site where commercial and community uses are proposed.

Consideration should be given to the removal of the raised table and ramped crossing as per sheet 9 comments.

Sheet 21

The provision of perpendicular parking resulting in reversing onto a busy road is considered undesirable. Redesign for angled or parallel parking should be considered.

Sheet 20

Loading on South Circular Road at Kilmainham Village should be retained.

The footpath on the south side of Old Kilmainham is narrow. Consideration should be given to the widening of the footpath particularly at the pedestrian crossing?

Sheet 23

Cognisance should be taken off the layout and access arrangements for the permitted Strategic Infrastructure (SID) application for the National Children's Hospital development within the James's Hospital campus. An Bord Pleanála is advised that the Mount Brown access does not include a slip lane and staggered pedestrian crossing as shown on the scheme drawings. A tighter junction layout is proposed with pedestrian priority across it, providing a better environment for pedestrians. A slip lane is considered undesirable and unnecessary. Redesign of this junction should be considered to align with the SID permission.

Sheet 24

Consideration should be given to the improvement of the main access/egress at James's hospital as part of the scheme. A signalised pedestrian crossing across the mouth of the entrance would greatly improve the environment for pedestrians at entrance to national hospital.

Consideration should be given to the retention of the cycle track at the edge of the footpath at the hospital entrance rather than running through it to reduce potential for conflict with pedestrians.

Sheet 25

Echlin Street is proposed as a 'quiet street' for cycling, yet this area will be subject to intensive redevelopment with very large construction site adjacent for many years.

Parallel parking is considered more desirable than perpendicular parking which encourages reversing onto the public road. This is not considered appropriate at this location.

Consideration should be given to the retention of the cycle track at the edge of the footpath (at hospital entrance and at junction with Bow Lane West) rather than running through it to reduce potential for conflict with pedestrians.

Sheet 26

The redevelopment of the Guinness Quarter will include 2 new hotels fronting onto James's Street. Consideration should be given to indented drop off/loading facility at this location.

Sheet 27

Loss of all loading and parking along Thomas Street (except for one small indented bay) is of concern having regard to the density of the commercial activity at this location and the lack of loading in the vicinity. Extensive regeneration of the adjacent area has been permitted and is proposed which will put additional pressure on the existing loading areas. Furthermore, loading is being removed through public realm improvement on Francis Street and Meath Street. Consideration should be given to a rebalancing of the layout in favour of the provision of additional loading space along Thomas Street in support of existing and future commercial activity.

Sheet 28

Loading bay and accessible space outside Farrow and Ball Paints appears too close to the junction. Relocation away from the junction should be considered.

Loss of all parking and loading on High street should be reconsidered in the context of adjacent businesses.

Regarding the substantial alterations proposed to the junction of Thomas Street with Cornmarket:

- The existing primary route for buses through the Cornmarket junction is East-West from Thomas St. onto High St., with Bridge St. - High St. being a secondary arm requiring a right turn or use of a slip lane. Priority is with the primary axis of this junction, which is a major entry point into the city. It appears that this priority is to be retained in the scheme proposals, as bus lanes and cycle tracks are proposed along this axis. Despite this, the revised alignment appears to de-prioritise cyclists and buses by diverting them from their East-West desire line and instead prioritising the High St-Bridge St. arm of the junction. The Cornmarket junction at Thomas Street onto High The very steep gradients on Bridge Street Upper will make deflection of the proposed scheme route even more onerous on inbound cyclists and buses. The more convoluted and cumbersome the cycling route is, the more non-compliance the layout will induce, particularly among the most vulnerable road users; pedestrians and cyclists. The rationale behind altering the geometry of the primary axis into a hard right/left turn between Thomas St. and High St is not clear. Recommend keeping CBC closer to existing or Round 1 alignment. If a T junction is deemed necessary, the Bridge St. arm should be the minor arm, with Thomas St. – High St. the primary through route.
- Left turning general traffic from Cornmarket onto Bridge Street Upper will no longer have a slip lane, nor use of the bus lane. Left-turners would therefore regularly block through traffic into the city on this urban arterial route, while waiting to make the manoeuvre. There is also the possibility of conflict with cyclists choosing to join general west to east traffic through the junction in order to avoid being deflected down a steep gradient. Has this been considered?
- While the junction with High Street and Bridge Street Upper could be tightened up to give priority to pedestrians crossing these roads, a crossing on the East of the junction was not deemed warranted in 2008.
- Other than limited tree planting, it is not clear what is proposed for the large pedestrian areas that are proposed to the south and west of the Cornmarket junction. The area to the south of the

junction remains in shade for most of the day. As such, this may not be the best location for a public realm improvement. This could be better sited to the north of the junction where it would have the benefit of greater sunlight and could flow into St. Audeon's park. Redistributing the space in this way would help realign the junction so that the Bridge St. arm becomes the minor axis of the proposed T junction and would reassert the dominance of the E-W axis of the junction.

- The revised cycle track alignment north of Cornmarket appears to reduce the existing footpath width. As above, consideration should be given to inverting the location of proposed public realm to provide more space on the sunny side of the junction and a more direct route through if for cyclists and buses.
- If the single phase pedestrian crossing on Bridge Street Upper were closer to the main pedestrian desire line (more east-west), vehicle stop line can be moved further south, to reduce vehicle delays clearing the junction. This however must be balanced with requirement for more pedestrian green time to cross the road more diagonally.
- Cornmarket was reconstructed as a high quality public realm scheme in 2008 after wide ranging consultation and consideration of a wide range of legitimate needs. These included, but are not limited to: Significant archaeology, accessibility and mobility, Dublin, Wayfinding, legitimate traffic needs (road user hierarchy, warrants, signalling, loading, rationalised parking, etc.), commercial needs, complex underground utility networks, public safety, public amenity of the plaza, public lighting arrangements, sight lines and power supply for Christmas tree, surface gradients and drainage, etc. The revised scheme layout would decommission the Cornmarket Environmental Improvement Works scheme entirely. The proposed alterations would require a challenging detailed design that will require costly compromises, major archaeological works, major utility diversion works, and challenging traffic management during construction, all while de-prioritising cyclists and buses by diverting them from their East-West desire line. While the 6 traffic lanes and 2 pedestrian refuge islands (on Bridge Street Upper arm) can be rationalised, and the reclaimed road space could add to the Public Realm on the northern footpath, retaining the existing East-West corridor as the main route, and Bridge Street Upper as the side street, would serve the majority of road users and the public realm/heritage better.

2.4.7.4 Public Lighting Department Comments and Recommended Conditions

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

2.4.7.5 Environmental Protection Division

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

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

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

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

The development shall incorporate Sustainable Drainage Systems in the management of surface water, providing an integrated approach with the landscaping proposals. Full details of these shall be agreed in writing with DCC Drainage Planning, Policy and Development Control prior to commencement of construction. Soft landscaping should be considered before hard landscaping. The SuDS design should refer to the new Dublin City Council Sustainable Drainage Design and Evaluation Guide published in 2021.

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

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

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

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

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

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

The following more detailed comments shall be addressed:

While an increase in permeable areas in some sections is welcome, consideration should still be given to SuDS treatment of runoff whenever possible. It would be preferable to see nature based solutions throughout rather than oversized pipes, though we recognise that site constraints might prevent the NTA providing these in some cases. In particular:

- There is an opportunity for a nature based solutions at junction of Kylemore road and Ballyfermot Road (B2875) which has not been shown in the drawings.
- Has consideration been given to soft landscaping as opposed to Tank / Pond provided as shown on Ballyfermot Road (B3200)?

While it is accepted that approximate design Attenuation Calculations and impermeable area calculations are shown as hatched areas, the exact areas are to be provided in the format set out in the Legend, in the drawings provided at detailed design stage.

The drawings are to be checked throughout the submission to ensure compliance with the Greater Dublin Regional Code of Practice. Currently, manholes are missing throughout the design at the start of piped networks and at multiple junctions.

River networks are to be included in the catchment drawings as they are missing and hence the drawings show outfalls going to illogical locations.

How the swales are to be maintained is difficult to understand with the locations of the manholes connecting multiple swales? This is to be clarified at detailed design stage.

Design check at Ballyfermot Road (B3800-B4200), the attenuation volume provided in the text box (129m^3) is not consistent with that shown in the leader (117m^3), this needs to be clarified.

Design check on Sarsfield Road (B4200-B4700) volumes provided to be clarified.

Design to be in accordance with Sustainable Drainage Design & Evaluation Guide 2021, for example (A360) the connection of the swales is to be clarified.

Water Framework Directive

The Water Framework Directive (2000/60/EC), (WFD) pertains to a number of identified waterbodies contiguous to the proposed Liffey Valley to City Centre CBC scheme.

There are a number of inflows into both the River Liffey and the River Camac from the surface water network in the vicinity of the route of the proposed scheme. The details of these are summarised in the table below:

River Liffey:

Number:	SUS25 reference number:	Grid coordinates:	Type & description:
1	SO10343115	-6.343660, 53.346306	Outfall from Overflow originating at Ballyfermot Road roundabout
2	SO10345003	-6.341552, 53.345771	Outfall from Surface originating at Ballyfermot Road and roundabout
3	SO10348003	-6.337067, 53.345105	Outfall from Surface originating at Ballyfermot Road
4	SO1134010	-6.344582, 53.346040	Outfall from Surface originating at Ballyfermot Road
5	SO11348003	-6.320668, 53.345297	Outfall from Surface originating at Chapelizod Bypass
6	SO14342207	-6.285888, 53.346658	Outfall from Surface originating at Watling Street
7	SO14343206	-6.283988, 53.346591	Outfall from Surface originating at Watling Street
8	SO14346208	-6.278678, 53.345883	Outfall from Surface originating at Bridgefoot Street
9	SO14349112	-6.274212, 53.345200	Outfall from Surface originating at Cornmarket

River Camac:

Number:	SUS 25 reference number:	Grid coordinates:	Type & description:
1	SO12330505	-6.318272, 53.340862	Outfall from Overflow originating at Inchicore Road - Grattan Crescent junction

2	SO12330507	-6.318964, 53.340331	Outfall from Surface originating at Grattan Crescent
3	SO12331606	-6.317709, 53.341080	Outfall from Surface originating at Emmet Road
4	SO12333604	-6.314445, 53.341413	Outfall from Overflow originating at 122 Emmet Road
5	SO12335603	-6.310977, 53.341498	Outfall from Surface originating at 37 Emmet Road
6	SO12336601	-6.309834, 53.341095	Outfall from Surface originating at 11 Emmet Road
7	SO12336606	-6.309708, 53.341063	Outfall from Combined originating at 37 Emmet Road
8	SO12339611	-6.304386, 53.341385	Outfall from Combined originating at 4 Old Kilmainham
9	SO12339612	-6.304346, 53.341381	Outfall from Combined originating at 4 Old Kilmainham
10	SO13330609	-6.303882, 53.341457	Outfall from Combined originating at 4 Old Kilmainham
11	SO13330608	-6.303849, 53.341458	Outfall from Combined originating at 4 Old Kilmainham
12	SO13330610	-6.303275, 53.341457	Outfall from Combined originating at 4 Old Kilmainham
13	SO13332704	-6.300912, 53.341695	Outfall from Combined originating at 37 Emmet Road
14	SO13333706	-6.299335, 53.341839	Outfall from Surface originating at 5 Mount Brown
15	SO13333702	-6.298850, 53.341809	Outfall from Surface originating at 5 Mount Brown

16	SO13333703	-6.298651, 53.341839	Outfall from Surface originating at 26 Mount Brown
17	SO13335810	-6.296339, 53.342645	Outfall from Combined originating at James Street

Dublin City Council is obliged to achieve a water quality status of 'good' or better with all priority waterbodies by December 2027.

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

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.

Note:

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

2.4.8 Archaeology Section Observations

The proposed bus corridor traverses the Zone of Archaeological Constraint for Recorded Monument DU018-020 (Historic City) from the junction of Emmet Road and South Circular Road to the eastern termination of the scheme at High Street. 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 (2016-22) and Draft Dublin City Development Plan 2023.

The proposed scheme runs through the suburbs of Ballyfermot, Inchicore, Kilmainham, along James's Street, Thomas Street, and High Street, following the southern edge of the River Liffey valley. Inchicore and Kilmainham were settled from the medieval period and this was an ancient routeway into Dublin known as the Slighe Mhór, running from the west into the medieval city through the Liberty of St Thomas. Prior to the growth of the suburbs in the twentieth century, the area outside of the city to the west was largely rural in character, with villages and milling activity focused on the River Liffey and its tributaries. This area of Dublin is considered to be of high archaeological potential, because of the lack of Georgian redevelopment. The potential is particularly high along the stretch of road from James's Street to Christ Church Place, which takes in the former medieval suburb and part of the Hiberno-Norse settlement and walled town. The scheme also interfaces with an area along Con Colbert Road / Memorial Road / Inchicore Road, to the south of the War Memorial Gardens, which formed part of an extensive Viking burial ground.

EIAR

The archaeological and cultural heritage impacts of the construction phase and operational phase associated with the construction and operation of the Liffey Valley 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 comprehensive desk study of published and unpublished documentary and cartographic sources, supported by a field survey. The findings of the report are summarised below.

The report noted thirty eight archaeological heritage features listed on the Records of Monuments and Places / Sites and Monuments Record, four on the Dublin City Industrial Heritage Record, one cultural heritage asset, one Zone of Archaeological Potential, and two non-designated archaeological sites that would be potentially impacted by the proposed scheme. The National Monuments in proximity to the scheme include Kilmainham Gaol (RMP DU018-125, NM 625), St Audoen's Church (RMP DU018-020075, NM 34) and the walls, towers and gates of the Viking and medieval city defences (DU018-020-001).

The report identified that an area of significant archaeological potential runs from Cornmarket to the end of the proposed scheme at High Street. This is evidenced by the wealth of documentary, cartographic and archaeological evidence for the Historic City of Dublin (RMP DU018-020). The town defences, which ran across Cornmarket, enclosed the Hiberno-Norse and later medieval town. In addition to the upstanding section of medieval wall at the junction of Lamb Alley and Cornmarket, there is likely to be surviving sub-surface remains of the western city ditch at Cornmarket (National Monument, RMP DU018-020001). In addition, Christ Church Cathedral (RMP DU018-020270) stands within its own precinct c. 15m east of the proposed scheme. Archaeological excavations carried out in this area have established that it formed part of the late eleventh –twelfth century Hiberno Norse town, occupied by post-and-wattle domestic buildings. While parts of Cornmarket and High Street were subject to archaeological investigations during the road widening works of the later twentieth century, it is expected that other sites and features survive below the existing road carriageway, along the line of the original streets.

Five non-designated archaeological sites of industrial heritage interest were also identified within this section of the proposed scheme. Two of these (DCIHR 18-10-038 and 18-11-002) relate to the former tramline that ran into the city centre, along Emmet Road to High Street. Although not visible, it is possible that the original tram lines survive below the existing road surface.

To date, the most significant archaeological investigations along the route were along James's Street, Thomas Street West and Thomas Street in 2013. Monitoring of the Quality Bus Corridor exposed over 200 archaeological features dating to between the twelfth and twentieth centuries (Giacometti and McGlade 2013), including well-preserved medieval street surfaces surviving only 300mm below the road surface on James's Street.

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

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

The EIAR proposes that all subsurface archaeological and cultural heritage issues will be resolved by mitigation during the pre-construction phase 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 should archaeological features be encountered during works.

The NTA will procure the services of a suitably-qualified archaeologist as part of its Employer's Representative team administering and monitoring the works.

The appointed contractor will make provision for archaeological monitoring to be carried out under licence to the DHLGH and the NMI, and will ensure the full recognition of, and the proper excavation and recording of, all archaeological soils, features, finds and deposits which may be disturbed below the ground surface.

All archaeological issues will be resolved to the satisfaction of the DHLGH and the NMI. The appointed contractor will ensure that the archaeologist will have the authority to inspect all excavation to formation level for the proposed works and to temporarily halt the excavation work, if and as necessary, having conferred with the NTA. They will be given the authority to ensure the temporary protection of any features of archaeological importance identified having conferred with the NTA.

The archaeologist will be afforded sufficient time and resources to record and remove any such features identified in accordance with the licensing requirements agreed.

Archaeological excavation ensures that the removal of any archaeological soils, features, finds and deposits is systematically and accurately recorded, drawn and photographed, providing a paper and digital archive and adding to the archaeological knowledge of a specified area (i.e. preservation by record). As archaeological excavation involves the removal of the archaeological soils, features, finds and deposits, following this mitigation measure there is no further impact on the archaeological heritage.

In the case of cellars, coal cellars and / or basements, the appointed contractor in consultation with the archaeologist engaged by them will make provision for a geodetic survey and recording of each individual structure which will be subject to impact. This survey and recording will be carried out in advance of any construction works on the cellar, coal cellar and/or basement. The appointed

contractor will make provision to allow for archaeological monitoring, inspection and excavation works that may arise on the site during the Construction Phase.

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

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

2.4.9 Conservation Assessment

Introduction

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

Dublin City Development Plan 2016 – 2022 (Volume 1)

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

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

It is the Policy of Dublin City Council:

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

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

It is the Policy of Dublin City Council:

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

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

It is the Policy of Dublin City Council:

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

Development will not:

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

Section 1.1.5.6 states “All new development must have regard to the local context and distinctiveness and the contribution to the local scene of buildings, landmarks, views, open spaces and other features of architectural, historic or topographical interest.”

It is the policy of Dublin City Council:

CHC7: “To protect and manage trees in Architectural Conservation Areas”.

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

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

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

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

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

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

Dublin City Tree Strategy 2016 – 2020

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

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

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

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 2016-2022 are retained and protected as far as practically possible. Where there is an unavoidable loss of historic trees, the NTA shall ensure that these are replaced with new semi mature trees to the satisfaction of DCC.

Architectural Heritage Protection Guidelines for Planning Authorities (2011)

Consideration of proposals affecting boundary features:

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

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

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

14.4.1 Street Furniture and Paving

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

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

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

Assessment

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

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

- Historic Paving and Kerbing

General Response

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

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

The Conservation Section considers that the photomontages provided in Figure 17.2 are limited and do not sufficiently assess the effects of the proposed route on views and visual amenity in relation to a number of sensitive historic areas along the scheme. The lack of photomontages along sections of the route, such as along Sarsfield Road and Emmet Road is disappointing as the impact of the proposed works on the built heritage of these areas is difficult to assess. In particular, the Conservation Section is concerned that only two photomontages have been provided for the east end of the scheme between High Street and James’s Street. A larger number would have been expected given the proximity of Christchurch Cathedral, Tailors’ Hall, Saint Audoen’s Church of Ireland Church, Saint Audoen’s Roman Catholic Church, the City Wall at Lamb Alley, Saint Catherine’s Church of Ireland Church, The Church of Saint Augustine and Saint John, and the Power Station of Guinness Brewery to the proposed scheme, all NIAH ‘Nationally’ rated structures which have been identified in Appendix A16.2 as being of ‘High’ sensitivity. The paucity of coverage through the historic inner city area is disappointing and as a result, the impact on the built heritage is difficult to assess.

It would have been helpful for a more comprehensive conservation assessment had the proposed new cantilever signal poles been shown on the General Arrangement drawings and also included in the photomontages along Ballyfermot Road.

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

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:

- NIAH 50080372 is mistakenly assigned to sites at the Cherry Orchard Hospital complex in Appendix A16.1 – A16.3 Architectural Heritage Appendices. NIAH 50080372 is actually Mont La Salle, Ballyfermot Road.
- Saint Matthew’s Church Ballyfermot is mistakenly referred to as NIAH 5008036 in Chapter 16 Architectural Heritage Report. The building is actually NIAH 50080369.

- There is an incorrect reference to Cherry Orchard Hospital in Chapter 16, Architectural Heritage Report. It is referred to as NIAH 50080371 (a post box located further east on Ballyfermot Road) rather than NIAH 5008367.
- The Statue of the Virgin Mary currently located on the Ballyfermot/Kylemore Road roundabout is referred to as 'CBC007BTH137' on Figure-16.1 Architectural Heritage and within the body of text at Section 16.3 of Chapter 16, however it is incorrectly referred to as 'CBC0007CH001' in Section 15.3.3.6 Cultural Heritage of Chapter 15.
- Not all sites recorded on the drawings contained in Figure-16.1 Architectural Heritage are included in Appendix-A16.2 Inventory of Architectural Heritage Sites. Omissions include a mid-20th century bungalow at No.3 Ballyfermot Road (CBC007BTH014); and a pair of late 19th century houses known as 'Mount Olivet Legion of Mary, Saint Andrew's' at Ballyfermot Road (CBC007BTH015).
- Four (no.) concrete lamp standards on Kylemore Road have not been identified in Appendix-A16.2 Inventory of Architectural Heritage Sites nor have these been represented on the drawings contained in Figure-16.1 Architectural Heritage. These items of street furniture are associated with the growth of the suburb from the mid-20th century onwards and their inclusion would have been expected, noting that similar concrete lamp standards have been identified in the EIA for other proposed Bus Connects routes.
- CBC005BTH032 is incorrectly labelled as CBC005BTH014 on Sheet 16 of Figure 16.1.
- Two sites numbered CBC005BTH013 are indicated on Sheet 16 – there is no reference to either of these in Chapter 16 or Appendix 16.2 and it is not known what these sites are.
- A number of elements are not marked up on their respective map sheets on Figure 16.1 including CBC007BTH164, which is not marked on Sheet 16, and CBC007BTH168 and CBC007BTH169, which are not marked on Sheet 18.
- CBC007BTH169 (Granite kerbstones to edge of footpath at 97 to 99 (odd numbers only) Emmet Road) appears to be included within CBC007BTH140 (Granite kerb stones to edge of footpath at 97 to 177 (odd numbers only) Emmet Road).

Key Impacts

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

- Protected Structures (& proposed) and their setting
 - a) Substantial land acquisition along the northern side of Ballyfermot Road on the General Arrangement drawings), will affect the protected gate piers of the former De La Salle National School (RPS 8784) and the associated boundary wall. The Conservation Section notes that 'principal paired entrance gate piers' aligned on an axis with the central block of the former national schools are specifically included in the extent of protection as outlined under the RPS entry for De La Salle National Schools (RPS 8784). A further pair of near identical gate piers, marking a pedestrian entrance to the former school grounds, opposing the junction of the Garyowen Road, will also be impacted. The gate piers are of architectural quality with fluted necks respondent to the flanking towers of the former school buildings. Although the Landscape General Drawings refers to the

'reinstatement of the rendered wall with railings' this makes no mention of the protected gate piers or the pedestrian gate piers. It is the recommendation of the Conservation Section that the mitigation measures outlined in Section 16.5.1.1 Protected Structures of Chapter 16 shall be extended to include the both the protected gate piers at the former De La Salle National Schools and the pedestrian piers opposing the junction of the Garyowen Road. The Conservation Section recommends that carefully considered method statements are provided for the removal and reinstatement of the gate piers, ensuring their authenticity and character are maintained. The reconstruction of the gate piers and boundary walls shall closely match the historic detailing/finishes to include the coursed cement-dashed finish of the boundary wall - any expansion joints within the new walls shall be carefully considered and where possible positioned to correspond with architectural features. The opportunity should also be taken to reinstate the former pyramidal cap stones (which are missing from the piers) during these works.

b) A large number of trees, both situated on the footpath and within the grounds of the former De La Salle National Schools (RPS 8774), will be removed as part of the substantial land acquisition along the northern side of Ballyfermot Road on the General Arrangement drawings.

Notwithstanding the fact that compensatory tree planting is proposed within the grounds of the former school, the loss of the existing mature tree line will have a direct impact on the setting of the Protected Structure in the short-term.

c) Other RPS structures along the route include RPS 7475 (Cleary's Licenced Premises). A cobbled surface to the front of the property could be damaged as a result of construction works. Therefore, the historic surface is to be protected from potential damage.

d) The removal of the bus stop on Grattan Crescent alongside Inchicore National Schools (RPS 7476) will have a positive impact on the setting of the protected structure.

e) Bus stops/shelters are located in close proximity to the following Protected Structures and Proposed Protected Structures - CIE Railway Estate boundary wall (RPS 8744), St Michael's Catholic Church on Emmet Road (RPS 2639), De La Salle National Schools (RPS 8774), Inchicore Public Library (proposed RPS 8839); 31 Old Kilmainham (RPS 8791), 30 Thomas Street (RPS 8773), Millers Hall 120-122 Thomas Street (RPS 8183, 8182), 82-83 Thomas Street (RPS 8171) and 84-85 Thomas Street (RPS 8172), 72 Thomas Street (RPS 8163), Tailors' Hall (RPS 332) and Saint Audoen's Roman Catholic Church (RPS 3822). It is noted on the General Arrangement drawings that the existing bus stops will generally be retained in their current positions. However, no details have been provided in relation to any proposed upgrading of the bus stops and/or the installation of shelters as part of the works. The installation of new bus shelters at these locations will negatively impact on the character and settings of these Protected Structures. The design of any new shelter in these locations should be carefully considered with the aim of minimising potential negative visual impacts, to support the reduction of clutter and to improve legibility of the Protected Structures and their settings. Of particular concern would be the installation of a bus shelter to replace the existing fingerpost bus stop at 30 Thomas Street due to its location immediately to the east of and St. Catherine's Church (RPS 8153), and the installation of a bus shelter to replace the existing fingerpost bus stop at Saint Audoen's Roman Catholic Church (RPS 3822). Both are NIAH 'Nationally' rated structures, which have been identified in Appendix A16.2 as being of 'High' sensitivity. The installation of new shelters at these location would negatively impact their character and setting including the views along the streetscape.

f) Public realm improvements are proposed at the site of an Obelisk, drinking fountain, sundial and bollards (RPS 4054) on the island at the junction of James's Street and Bow Street. While there are no direct adverse impacts on these structures apparent, there may be indirect impacts as a result of the proposed works during the construction phase of the project. 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.

g) There are a number of additional structures included on the Record of Protected Structures on the subject map sheets. These includes St. Patrick's Hospital (RPS 856), Saint Catherine's Church (RPS 8153), Guinness' Power Station (RPS 8786), Church of Saint Augustine and Saint John (RPS 8174), City Wall at Lamb Alley (RPS 4276), Saint Audoen's Church of Ireland Church High Street (RPS 3821), Saint Audoen's Roman Catholic Church High St (RPS 3822), and Tailors' Hall, High Street (RPS 332). These structures are located in close proximity to the route boundary. They are all NIAH 'Nationally' rated structures which have been identified in Appendix A16.2 as being of 'High' sensitivity. While there are no direct adverse impacts on these structures apparent, however there may be indirect impacts as a result of the proposed works during the construction phase of the project. 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.

- Buildings and other non-Protected Structures (post boxes/milestones etc.) included on the National Inventory of Architectural Heritage (NIAH)

a) Cherry Orchard Hospital, Gate Lodge, Ballyfermot Road (NIAH 50080470) dating to 1953. At the entrance gate lodge of Cherry Orchard Hospital (NIAH 50080470) the Proposed Scheme includes a temporary land-take along Ballyfermot Road to accommodate a new bus shelter. The boundary comprises of mature hedging with railings in a low modern rubble wall at the east end. It is further proposed a new cantilever signal pole will be erected on Ballyfermot Road located opposite Cherry Orchard Hospital (NIAH 50080371). It not clear as to the exact location but there is no cantilever in this stretch of road currently. It is considered that the proposed new bus shelter and associated land acquisition and cantilever signal pole will impact negatively on the setting of this complex of NIAH 'Regionally' rated structures. The Conservation Section recommends that carefully considered method statements are provided to ensure that the setting of these 'Regionally' rated structures and hospital complex (NIAH 50080367) are not further eroded and negatively impacted.

b) Cherry Orchard Hospital, wall mounted post box, Ballyfermot Road (NIAH 50080457) dating to 1955. There appears to be limited impact to this 'Regionally' rated post box.

c) Cherry Orchard Hospital, Church, Ballyfermot Road (NIAH 50080368), built 1953. There is potential for the proposed land acquisition associated with the proposed relocated bus stop to negatively impact the setting of the church (NIAH 50080368) and the wider hospital complex (NIAH 50080367).

d) Cherry Orchard Hospital, Mortuary, Ballyfermot Road (NIAH 50080472), built 1953. The General Arrangement drawing shows temporary land acquisition to the east end of the Cherry Orchard Hospital (NIAH 50080367) on Ballyfermot road, just north of the Mortuary Chapel (NIAH

50080472). This stretch of boundary appears to have been altered in the recent past and the Conservation Section recommends that carefully considered method statements are provided for the reconstruction of the boundary to ensure that the setting of the NIAH 'Regionally' rated structures are not further eroded and negatively impacted.

- e) Saint Matthew's Church, Catholic church, Ballyfermot Road (NIAH 50080369) built 1974. There appears to be limited impact to this 'Regionally' rated church.
- f) Post Box, Le Fanu Road (NIAH 50080458), manufactured c.1890 but probably relocated to present location c.1980. There appears to be limited impact on this 'Regionally' rated post box.
- g) The proposed 'upgrading' of the existing roundabout at the Ballyfermot/Kylemore Road junction to a signalled junction will impact on the character and setting of the Church of Our Lady of the Assumption (NIAH 50080370). The NIAH records the mid-20th century church by Robinson, Keefe and Devane as 'a focal point to the community'. The proposed signalled junction will introduce visual clutter – it is recommended that signage and semaphores should be kept to the necessary minimum. Furthermore, although the introduction of new soft landscaping on the periphery of the junction is supported, the loss of the substantial area of grassland, presently represented in the roundabout, will alter the receiving environment of the church as acknowledged in Section 17.5.2.1.4 of Chapter 17. The loss of such a large expanse of vegetation in this landmark location is regrettable and it is recommended that the proposal to 'upgrade' the roundabout to a signalled junction is reconsidered.
- h) There is the potential for the post box (NIAH 50080371) outside the Ballyfermot Resource Centre on Ballyfermot Road to be damaged during its relocation. The recording of the post box in its current location prior to its removal and the supervision of the work by a conservation professional will be required. Exact details of the proposed relocation shall be provided.
- i) Substantial land acquisition along the northern side of Ballyfermot Road on the General Arrangement drawings, will impact on the boundary wall, gate piers and decorative gates of Mont La Salle (NIAH 50080372). The gate piers and gates are of some architectural quality. Although Section 16.5.1.4 NIAH Structures of Chapter 16 and the General Landscaping Arrangement drawings detail the 'reinstatement of the rendered wall with railings', Photomontage View 14 would suggest that the proposal includes for the removal of the gate piers and gates. The loss of the gate piers and gates represents an erosion of the special character of the streetscape. It is the recommendation of the Conservation Section that the gate piers and decorative gates to Mont La Salle are recorded, carefully taken down and reinstated on completion of the work. The mitigation measures outlined under Section 16.5.1.4 NIAH Structures of Chapter 16 shall be extended to the gate piers and decorative gates. The Conservation Section further recommends that carefully considered method statements are provided for the removal and reinstatement of the gate piers, ensuring their authenticity and character are maintained. The reconstruction of the gate piers and boundary walls shall closely match the historic detailing/finishes to include the smooth cement-rendered finish of the boundary wall - any expansion joints within the new walls shall be carefully considered and where possible positioned to correspond with architectural features.

j) A large number of trees running parallel to the boundary wall within the grounds of Mont La Salle (NIAH 50080372), will be removed as part of the substantial land acquisition along the northern side of Ballyfermot Road on the General Arrangement drawings. Notwithstanding the fact that compensatory tree planting is proposed within the grounds of Mont La Salle, the loss of the existing mature tree line will have a direct impact on the setting of the structure in the short-term.

k) A post box (NIAH 50080384) on Emmet Road (Sheet 20) will not be directly impacted on by the proposed work including the positioning of a new bus stop in close proximity. However, there is the potential for the post box to be damaged as a result of construction work. The post box should be adequately protected.

l) Bus shelters are located in close proximity to the following NIAH Structures - Inchicore Workman's Club, 187 Emmet Road (50080088), Inchicore Library (50080156), 31 Old Kilmainham (50080167), Ceannt Fort (50080180), Guinness Brewery (50080280), Guinness Turbine House (50080324), Millers Hall (50080616), 30 Thomas Street (50080609), 84 Thomas Street (50080577), 72 Thomas Street (50080571), St. Audeon's Roman Catholic Presbytery (50080536) and Tailors' Hall (50080535). It is noted on the General Arrangement drawings that the existing bus stops will be retained in their current positions. However, no details have been provided in relation to any proposed upgrading of the bus stops/shelters as part of the works. The installation of new bus shelters at these locations will negatively impact on the character and settings of these buildings. The design of any new shelter in these locations should be carefully considered with the aim of minimising potential negative visual impacts, to support the reduction of clutter and to improve legibility of the Protected Structures/NIAH rated structures and their settings.

m) Amendments to the entrances to Guinness Brewery (50080315; 50080316; 50080275) and to the Guinness Turbine House (50080324). These will negatively the character of these formal entrances and the design of works at these locations should be carefully considered.

n) 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.

- Structures on the Dublin City Industrial Heritage Record Survey (DCIHR)
 - The route passes beneath the railway bridge carrying the railway (formerly route of Great Southern & Western Railway) on Sarsfield Road (DCIHR 18_09_002). The abutment walls and piers of the bridge are to be protected to ensure there is no indirect impact as a result of construction works.
 - The route crosses the railway bridge carrying Memorial Road over the railway (DCIHR 18_10_002). The deck of this bridge has been widened and has little surviving historic fabric remaining.
 - The route crosses two bridges on Emmet Road – DCIHR 18_10_036 which crossed a millrace with no above ground remains visible today and DCHIR 18_10_037, which is largely replaced. It is possible that below ground remains of the bridge and mill race survive.

- The No. 22 tram, which ran from Inchicore to Westland Row railway station, started at the Tramway Depot on Spa Road (now demolished) and ran along Emmet Road (DCIHR 18_10_038). It is possible that remains of the tramway survive beneath the current roadway.
 - The route crosses one bridge on the South Circular Road – DCIHR 18_10_33. The deck of this bridge has been widened.
 - The section of the corridor at James’s Street matches the route of the former 19th/early 20th century tramway (DCIHR 18_10_038 and DCHIHR 18_11_002 Tramway), where tramway infrastructural elements may survive below the carriage way.
 - The section of the corridor at Thomas Street includes the site of DCIHR 18_11_210 (Glib Market) and the site of DCIHR 18_11_211 Corn Market House.
 - It is acknowledged that archaeological monitoring under licence (as defined in Chapter 15) will take place to include all DCIHR sites.
- Other unprotected structures that contribute positively to the architectural heritage and streetscape character
 - Railings: The stretch of railings along the park to the west of the Ballyfermot Community Centre on Ballyfermot Road and at the park at the junction with Blackditch Road appear to be retained as part of the works. These metal railings set on a concrete plinth are attractive mid-century design features and add visual interest to the streetscape. They are associated with the growth of the suburb from the mid-20th century onwards and are considered vulnerable to damage from construction activities. The Conservation Section recommends that the railings are retained in situ and that the careful mitigation and protection measures be extended to these features.
 - Unprotected houses: It is welcome that limited land acquisition will impact Residential Areas (lands zoned Z1), however there are a number of houses that contribute positively to the streetscape but are not recorded on the NIAH or protected under the RPS and will be impacted by the removal of parallel access and the subsequent need to install vehicular access where there is presently pedestrian gates in situ. Though modest in their design, the variety of boundary and gates along the Ballyfermot Road is illustrative of the development of the city’s suburbs, comprising housing constructed from the mid-twentieth century onwards. Any proposed mitigation measures should ensure that where original/historic gates survive – the new gates should be facsimile’s of the original allowing for the widened detail.
 - Two modern granite boundary makers located on the Ballyfermot/Kylemore Road roundabout have not been identified within the EIAR. Notwithstanding that the markers reflect a modern addition to the streetscape they are considered to contribute to their setting. The proposed ‘upgrading’ of the roundabout to a signalised junction as detailed within the submission will lead to a loss of these features. It is recommended that the granite markers are carefully removed and relocated in a suitable position within the adjacent redesigned public realm.
 - The statue of Mary currently located on the Ballyfermot/Kylemore Road roundabout (CBC007BTH137) will be repositioned to accommodate the proposed upgrading of the junction. The position of the relocated statue, as depicted in Photomontage View 10a, would not appear to exactly correspond with the location as shown on the General Arrangement drawings. Clarification of the proposed relocation shall be provided.

- Substantial land acquisition along the northern side of Ballyfermot Road on the General Arrangement drawings, will impact on the boundary of St. Raphael's, St. Gabriel's, St. Michaels Primary Schools and Ballyfermot Resource Centre (CBC0007BTH008). The four gate piers to the Ballyfermot Resource Centre are identical to those at De La Salle National Schools, having fluted necks, and are considered to be of architectural quality. Although Section 16.5.1.6 Other Structures of Chapter 16 and on the General Landscaping Arrangement drawings detail the 'reinstatement of the rendered wall with railings', these do not specifically refer to the gate piers. It is the recommendation of the Conservation Section that the four gate piers to Ballyfermot Resource Centre are recorded, carefully taken down and reinstated on completion of the work. The mitigation measures outlined under Section 16.5.1.6 Other Structures of Chapter 16 shall be extended to the four gate piers. The Conservation Section further recommends that carefully considered method statements are provided for the removal and reinstatement of the gate piers, ensuring their authenticity and character are maintained. The reconstruction of the gate piers and boundary walls shall closely match the historic detailing/finishes to include the course cement-dashed rendered finish of the boundary wall - any expansion joints within the new walls shall be carefully considered and where possible positioned to correspond with architectural features. The opportunity should be taken during these works to reinstate the pyramidal cap stones that are missing from the piers.

- A large number of trees running parallel to the boundary wall within the grounds of St. Raphael's, St. Gabriel's, St. Michaels Primary Schools and Ballyfermot Resource Centre (CBC0007BTH008) will be removed as part of the substantial land acquisition along the northern side of Ballyfermot Road on the General Arrangement drawings. Notwithstanding the fact that compensatory tree planting is proposed within the grounds of these structures, the loss of the existing mature tree line will have a direct impact on the streetscape and setting of these structures in the short-term.

- Land acquisition along the southern side of the Ballyfermot Road on the General Arrangement drawings, will impact on a section of boundary railings and associated plinth wall to Markievicz Park (CBC0007BTH154). The subject section of railings form part of a pleasing gentle sweep at the junction of Ballyfermot Road and O'Hogan Road. There is a lack of clarity in relation to the railings noting that the General Arrangement drawing indicates a 'proposed retaining wall' in this location, while the Landscape General Arrangement drawing indicates a 'rebuilt wall and railings along new boundary line and tied into existing'. Furthermore it is noted that Section 16.5.1.5 Designed Landscapes of Chapter 16 states, in relation to the railings, that 'if possible, the materials are to be retained for reuse'(underlining by Conservation Section for emphasis). It is the recommendation of the Conservation Section that the maximum amount of historic fabric shall be retained in the reinstatement of the section of railings.

- Notwithstanding that Section 16.5.1.5 Designed Landscapes of Chapter 16 states that 'the entrance gates and piers to the [Markievicz] park will remain untouched', the boundary railing and associated gate piers to the park (CBC0007BTH154) are considered vulnerable to

damage from construction activities. The gates and railings are to be retained in situ and shall be protected during the construction phase and where pavement works are proposed.

- The former boundary wall of Mount Vernon House (house demolished), which incorporates part of the abutment walls for the railway bridge carrying the railway bridge over Sarsfield Road may be impacted as a result of the proposed works during construction phase of the project. The wall is to be adequately protection and construction works are to be supervised by a conservation professional.
- There is a reproduction post box at 80b Thomas Street. This will be retained in position but may require protection from potential impact during the construction phases of the project as they are located within the site boundary.
- Architectural Conservation Areas and Conservation Areas
 - The proposed route runs along a section of the Grattan Crescent Park Conservation Area.
 - The east end of the proposed route will run through Thomas Street and Environs ACA. Changes to the urban realm will impact on the character of the ACA, particularly the proposed provision of new bus shelters at existing bus stops. The provision of bus shelters in close proximity to Protected Structure would negatively impact on the architectural character and setting of the ACA, including important vistas within the ACA. The location and design of new infrastructure, signage and bus stops/shelters shall be carefully considered with the aim of minimising potential negative visual impacts, to support the reduction of clutter and to improve legibility of the historic streetscapes and adjacent heritage structures of the ACA.
 - The proposed route corridor is proximal to a red-hatch Conservation Area covering the Camac River at the east end of Emmet Road and west end of Old Kilmainham. The proposed route corridor runs through a red-hatch Conservation Area covering James's Street, Thomas Street and Cornmarket.
 - The cumulative effect of additional signage and street furniture, together with proposed bus shelters/stops and changes to the urban realm may impact on the character of historic urban streetscapes of the red-hatch Conservation Areas. The location and design of new infrastructure, signage and bus stops/shelters shall be carefully considered with the aim of minimising potential negative visual impacts, to support the reduction of clutter and to improve legibility of the historic streetscapes and adjacent heritage structures of the Conservation Area.
- Lands zoned Z2 in the Dublin City Development Plan 2016-2022, which aims to "protect and / or improve the amenities of residential conservation areas."
 - The proposed route is adjacent to lands zoned Z2 at the junction of Ballyfermot Road and Sarsfield Road on the General Arrangement drawings.
 - The proposed route is proximal to lands zoned Z2 lands at the South Circular Road, Mount Brown, St. Catherine's Church, Thomas Street.

- The proposed route runs alongside lands zoned Z2 on Sarsfield Road (Inchicore Terrace North). The Inchicore Railway Works boundary (RPS 8744) provides a buffer between the route and the residential conservation area.
- The route runs alongside Z2 zoned lands on Grattan Crescent. New signage is proposed at the junction of Grattan Crescent and Inchicore Terrace South, which has the potential to adversely impact the setting of the residential conservation area.
- Lands zoned Z8 in the Dublin City Development Plan 2016-2022, which aims to “protect the existing architectural and civic design character, and to allow only for limited expansion consistent with the conservation objective.”
 - The proposed route shares a boundary with lands zoned Z8 at High Street.
- Potential impacts on historic paving and kerbing, historic street furniture and lamp standards and other features.

Lamp Posts:

- Approximately ten concrete lamp posts on Ballyfermot Road and four concrete lamp standards to Kylemore Road have not been identified within the EIAR. No details have been provided in relation to the concrete lamp posts and the impact of the proposed scheme in relation to these has not been considered. These items of street furniture are associated with the growth of the suburb from the mid-20th century onwards and are considered vulnerable to damage from construction activities. The Conservation Section recommends that the lamp posts are retained in situ and that the mitigation and protection measures identified in Section 16.5.1.7.2 Lamp Posts of Chapter 16 shall be extended to these features.
- Lamp posts on James’s Street, John’s Lane West, Cornmarket/High Street, St. Michael’s Close; reproduction lamp posts James’s Street, Thomas Street, High Street; tram standard at Old Kilmainham/Suir Road junction will be retained in position but may require protection from potential impact during the construction phases of the project as they are located within the site boundary.

Cobbles/Setts/Surfaces:

- The following streets James’s Street; Thomas Street; John Street West; High Street are listed in Appendix 8 of the Dublin City Development Plan – the streets have granite kerbing.
- John’s Lane West. The cobbled surfaces will be directly impacted by junction improvements to south end.
- A section of historic kerbstones survives at the entrance to Woodfield Cottages from Sarsfield Road. It is not clear what impact there will be on the kerbstones as a result of the proposed works. The kerbstones are to be retained and protected during the construction phase.
- It is noted that there are no works proposed to surviving surface treatments along the route at the following locations: Narrow granite kerb stones to the edge of footpath between 97 and 131 Inchicore Road (odd numbers only); A granite edged cellar hatch at the Black Lion Pub, Grattan Crescent (CBC007BTH139); An Iron grille / hatch at 193 Emmet Road Inchicore (CBC007BTH165); A

granite edged cellar hatch at 189 Emmet Road Inchicore (CBC007BTH142); Granite kerb stones to edge of footpath at 97 to 177 (odd numbers only) Emmet Road Inchicore (CBC007BTH140); A granite edged cellar light at 153 Emmet Road Inchicore (CBC007BTH141); Two grilles / hatches which has become obscured by concrete paving at 119 Emmet Road Inchicore (CBC007BTH143, CBC007BTH144); Granite kerb stones to edge of footpath at 109 to 117 (odd numbers only) Emmet Road Inchicore; Granite kerb stones to edge of footpath at 97 to 99 (odd numbers only) Emmet Road Inchicore. There is potential for damage to these historic items of street furniture as a result of construction works and they should be adequately protected.

Other Street Furniture/Finishes:

- An early twentieth-century electrical control box survives on Grattan Crescent. There is potential for damage to this historic item of street furniture to be damaged as a result of construction works and it should be adequately protected.

- **Proposed Tree Removal and Provision of New Trees**

- The proposed removal of trees will have a significant impact on the architectural character and setting of historic structures, both protected and unprotected, and streetscapes.

- One group of 14 (no.) trees will be removed to facilitate development at Mount Brown the impact of their removal on the streetscape is lessened by the retention of a second line of trees immediately to the south. Individual trees will be removed at Old Kilmainham, High Street and Cornmarket.

- **Boundary Treatments**

- The Conservation Section notes that where works will 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's Conservation Section and having regard to the provisions of the Architectural Heritage Protection Guidelines for Planning authorities (2011) and the relevant DHLGH Advice Series publication(s).

- **Cycle Lanes**

- Coloured tarmacadam to cycle lanes will alter the physical and visual character of the existing streetscapes to include Ballyfermot Road, lined with religious and institutional buildings dating to the early 1950s, to include the former De La Salle National Schools, a Protected Structure (RPS 8784).

- 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. 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.

2.5 Conclusion

The proposed Liffey Valley to City Centre Core Bus Corridor Scheme is supported and welcomed by Dublin City Council as it will ensure the delivery of a number of key policies and objectives of the Dublin City Development Plan 2016-2022 as well as the draft Dublin City Development Plan 2022-2028. The development of the Core Bus Corridor Scheme will provide an upgraded and expanded bus network and quality of service together with better quality cycling and pedestrian facilities. These

improvements will make it easier for people to access and use public transport. In turn, this will promote modal shift from the private car to more sustainable forms of transport including walking, cycling and public transport, ultimately contributing to the creation of a greener and more sustainable city.

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

APPENDIX 1

Recommendations/Conditions

Dublin City Council and the National Transport Authority

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

Environment and Transport Department Recommendations/Conditions

Traffic Division

1. All the traffic management equipment that is necessary for the safe and efficient operation of this Public Transport corridor, including all traffic signal equipment, shall be to the relevant Dublin City Council specification and only the relevant Dublin City Council maintenance contractor shall be permitted to undertake electrical or system control work on either the existing or new traffic signals.
2. Prior to the coming into operation of the Liffey Valley BusConnects Scheme, the NTA in conjunction with Dublin City Council shall develop and implement a co-ordinated loading and servicing strategy for businesses and traders located on and within the immediate vicinity of the Thomas street and James's Street Corridor.

Roads Division

Handover:

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

Existing Condition Record:

1. A photographic record of all areas in Dublin City Council's control to be affected by the Bus connects scheme works shall be provided to Dublin City Council (DCC) prior to the commencement of any work.
2. Drawings distinguishing between antique granite footways and kerbs and new granite footways and kerbs shall be submitted as part of detailed design development of approved scheme.
3. Drawings clearly demarcating private landings shall submitted as part of detailed design development of approved scheme.

Design:

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

9. Alterations to kerbside spaces such as pay and display scheme/loading/line markings/signage pole shall be agreed with the Planning Authority to ensure adequate loading and set down is provided.
10. All signage and road markings to comply with the Traffic Signs Manual.

Reinstatement:

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

Construction Period:

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

Miscellaneous

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

Public Lighting

In terms of delivering the public lighting elements of this project, it is recommended that careful consideration be given during the detailed design process to all the various different elements including the required light level design and the relevant EN certification as well as existing heritage and high value lighting Columns. .

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

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

Temporary Lighting

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

Environmental Protection Division

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

1. This development must comply with the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0 (available from www.dublincity.ie Forms and Downloads). In particular:
 - Continuous Kerbs incorporating drainage, as outlined in Figure 2, Page 3 in Appendix K Drainage Design Basis Document, are not accepted by DCC Drainage Planning, Policy and Development Control.
 - Enclosed drainage channels such as slot drains or "ACO" drains are not accepted by Drainage Planning, Policy and Development Control.
 - The hybrid gully outlined in Section 1.1.3, Page 4 in the BusConnects - Road run-off collection gullies Technical Paper is not accepted by DCC Drainage Planning, Policy and Development Control. The use of narrow profile gullies as previously agreed is welcome.

2. The development shall incorporate Sustainable Drainage Systems in the management of surface water, providing an integrated approach with the landscaping proposals. Full details of these shall be agreed in writing with DCC Drainage Planning, Policy and Development Control prior to commencement of construction. Soft landscaping should be considered before hard landscaping. The SuDS design should refer to the new Dublin City Council Sustainable Drainage Design and Evaluation Guide published in 2021.
3. The detailed drainage design shall be agreed in writing with DCC Drainage Planning, Policy and Development Control prior to commencement of construction. Surveys on the location and condition of surface water infrastructure sewers, both pre and post development, shall be carried out by the developer and any damage rectified. Any diversions shall be agreed in writing, prior to commencement, with Drainage Planning, Policy and Development Control. To avoid multiple connections to combined sewers a separate surface water network should be constructed. Details on proposed connection locations to the surface water network and flow discharges shall also be agreed.
4. To support our achievement of our legislative obligations the Blanchardstown to City Centre CBC proposal should not cause a deterioration of the status of any waterbody to which it is contiguous with downstream and furthermore should support the attainment of good ecological and good surface water chemical status, in accordance with DCC and national obligations. The NTA shall provide an evidence-based assessment of the impact, if any, of the proposed scheme on the water quality status of rivers within the curtilage of the proposed project, including both ecological and chemical status.
5. The NTA shall confirm in writing to Drainage Planning, Policy and Development Control that the development has been designed such that the risk of flooding to the development has been reduced as far as is reasonably practicable, and that the proposals do not increase the risk of flooding to any adjacent or nearby area. This includes assessment of pluvial flood risk at all locations along the route (not just where sections are 150m long). The effect of climate change on flooding, +20% rainfall and 0.5m sea level rise should be allowed for in calculations. Any changes in ground profile shall be modelled to demonstrate no increase in flood risk and to reduce it where reasonably possible.
6. The developer must demonstrate that this development passes the three stages of the SFRA Justification Test, particularly for tidal and fluvial flooding.
7. New compensatory SuDS measures should be provided close to any green areas lost.
8. As-built drawings of all drainage networks and SuDS measures shall be provided by the NTA on completion of the works.

Recommendations/Conditions – Air and Noise Pollution Control Unit

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

Archaeology

1. The NTA shall assign a Project Archaeologist to oversee the archaeological elements of the project from inception to completion.
2. Ensure that the Project Archaeologist will be a member of the project team. As part of the project team 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. Require that the process of identifying the potential impact the project on archaeology will be dealt with by a competent archaeologist. The Project Archaeologist shall oversee the archaeological operations carried out by the contractor's archaeological consultant.
4. 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.
5. 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.
6. 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.
7. Publish and/or disseminate, as appropriate, the archaeological results of the project.
8. The NTAs Project Archaeologist to copy Dublin City Council Archaeology Section with Method Statements and reports and provide the Archaeology Section of Dublin City Council with regular communications on finds and mitigation throughout the delivery of the scheme through to completion.

9. 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.

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 2016-2022, the Architectural Heritage Protection Guidelines for Planning Authorities (2011) and relevant documents of the DHLGH Advice Series.
2. The conservation professional shall ensure adequate protection of the retained and historic fabric during the proposed works and across all preparatory and construction phases. In this regard, all works shall be designed to cause minimum interference to historic fabric.
3. In accordance with best conservation practice, specifications and method statements for the careful and sensitive relocation and reinstatement of historic fabric identified in the report above, and in particular to Protected Structures, sites/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) Consideration should be given to the rationalisation of all signage across the route to reduce visual clutter.
 - b) 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.
 - c) There is concern that the cumulative impacts of land acquisition to facilitate the proposed widening of roads to accommodate the bus routes will, in some specific locations, have a seriously detrimental and adverse impact on the architectural heritage of the city. Where land acquisition is unavoidable, historic boundary features are to be reinstated in their new locations on a 'like-for-like' basis, by skilled practitioners under the supervision of the conservation professional appointed for the project.
 - d) While the EIAR considers the magnitude of the impact of new bus shelters to the streetscape in front of protected structures to be Low, the Conservation Section is concerned about the impact of these new elements of street furniture on structures considered by the NIAH to be of 'Regional' importance or above. Of particular concern is the installation of a bus shelter to replace the existing fingerpost bus stop at 30 Thomas Street due to its location immediately to the east of St. Catherine's Church (RPS 8153), and the installation of a bus shelter to replace the existing fingerpost bus stop at Saint Audoen's Roman Catholic Church (RPS 3822). Both are NIAH 'Nationally' rated structures, which have been identified in Appendix A16.2 as being of 'High' sensitivity. The installation of new shelters and associated infrastructure at these locations would negatively impact the setting and visual amenity of these historic structures including views along the streetscape. The Conservation Section recommends that the proposed new bus shelters be relocated, with details to be submitted for the prior written agreement of the Planning Authority.

City Architects Recommended Conditions

Local Public Realm Improvement Schemes

Detailed drawings and specifications of the proposed urban realm improvement schemes identified at

- (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 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

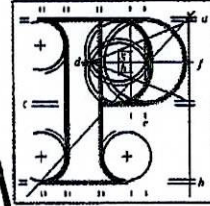
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2. All landscape components of the proposals will require contract maintenance for a minimum of 3 years following completion of the works or any phases. Landscape areas agreed to be taken in charge will require full completion of the 3 year maintenance 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.

Richard Shakespeare
Assistant Chief Executive
Dublin City Council

Our Case Number: ABP-314942-22



An
Bord
Pleanála

PLANNING DEPARTMENT

10 MAR 2023

RECEIVED

Dublin City Council North
Planning & Development
Civic Offices
Block 4, Floor 3
Wood Quay
Dublin 8

Date: 09 March 2023

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

Dear Sir / Madam,

An Bord Pleanála refers further to the application for approval by the National Transport Authority in relation to the above-mentioned proposed development under section 51 of the Roads Act 1993, as amended.

In accordance with section 217B(1)(a) of the Planning and Development Act 2000, as amended you are requested to make observations in relation to the proposed development.

Your response should be made to the Board on or before 29th March, 2023.

If you have any queries in relation to the 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,

Doina Chiforescu
Executive Officer

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Glao Áitúil LoCall 1800 275 175
Facs Fax (01) 872 2684
Láithreán Gréasáin Website www.pleanala.ie
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