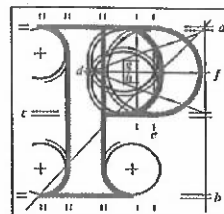


Our Case Number: ABP-316272-23



An  
Bord  
Pleanála

South Dublin County Council  
Planning Department  
County Hall  
Tallaght  
Dublin 24

Date: 23 August 2023

Re: Bus Connects Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme  
Templeogue/Rathfarnham to 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.

The Board has also received an application for confirmation of a compulsory purchase order which relates to this proposed road development. The Board has absolute discretion to hold an oral hearing in respect of any application before it, in accordance with section 218 of the Planning and Development Act 2000, as amended. Accordingly, the Board will inform you in due course on this matter. The Board shall also make a decision on both applications at the same time.

If you have any queries in relation to this matter please contact the undersigned officer of the Board at [laps@pleanala.ie](mailto:laps@pleanala.ie)

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

Yours faithfully,

Eimear Reilly  
Executive Officer  
Direct Line: 01-8737184  
HA02A

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

**Eimear Reilly**

**From:** Darren Fagan <darrenfagan@SDUBLINCOCO.ie>  
**Sent:** Tuesday 15 August 2023 14:19  
**To:** Eimear Reilly; LAPS  
**Cc:** SIDS; Shaun McGee  
**Subject:** Bus Connects - Templeogue / Rathfarnham Route - ABP-316272-23 - South Dublin County Council Submission - Deadline 15th August 2023  
**Attachments:** South Dublin County Council Submission on Bus Connects-Templeogue-Rathfarnham Route 15 August 2023 FINAL.docx; R114 Bus Connects 1\_Watermains & Drainage.pdf; R114 Bus Connects 2\_Watermains & Drainage.pdf; R821 Bus Connects 1\_Watermains & Drainage.pdf

To whom it may concern,

Please find attached; South Dublin County Council's Submission in relation to the Bus Connects – Templeogue/Rathfarnham Core Bus Corridor Scheme for consideration.

Please acknowledge receipt of same.

Kind Regards,

Darren Fagan | Assistant Planner| Development Management | Land Use Planning and Transportation Department |

South Dublin County Council | County Hall, Tallaght, Dublin 24 |  
 Mobile: 086 136 0026 | Email: [darrenfagan@sdblincoco.ie](mailto:darrenfagan@sdblincoco.ie) | Web: [www.sdcc.ie](http://www.sdcc.ie) |



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Is eolas faoi rún an t-eolas atá sa ríomhphost seo agus d'fhéadfadh go mbeadh sé faoi phribhléid ó thaobh an dlí de. Is don té ar seoladh chuige/chuici agus dósan/dise amháin an t-eolas. Ní ceadmhach do dhuine ar bith eile rochtain a bheith aige/aici ar an ríomhphost seo. Murar duit an ríomhphost seo tá nochtadh, cóipeáil, dáileadh ná aon ghníomh eile a dhéanamh nó aon ghníomh eile a fhágáil gan déanamh ar iontaoibh an ríomhphoist seo toirmisceithe ort agus d'fhéadfadh siad sin a bheith neamhdhleathach. Má fuair tú an teachtaireacht leictreonach seo trí earráid téigh i dteagmháil, le do thoil, leis an té a sheol í nó le [info@sdblincoco.ie](mailto:info@sdblincoco.ie). Glanadh an teachtaireacht seo le bogearraí Frithvíreas.

# South Dublin County Council Submission on Bus Connects

Templeogue/Rathfarnham to City Centre Core  
Bus Corridor Scheme.

Land-Use Planning and Transportation Department  
August 2023

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# Introduction

The National Transport Authority (NTA) have submitted a planning application to An Bord Pleanála for the **Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme**.

The documents submitted with this application include:

Proposed Design Drawings and supporting and statutory documentation which include:

- Environmental Impact Assessment Report
- Natura Impact Statement

**In this report, South Dublin County Council (SDCC) will be making a formal submission to An Bord Pleanála as part of this consultation process. As specified on public notices, the proposed scheme will comprise the following;**

*“The construction of the Templeogue / Rathfarnham to City Centre Core Bus Corridor Scheme which has an overall length of approximately 10 km, and will commence on the R821 Grange Road at the junction with Nutgrove Avenue, then travel along the R821 Grange Road, the R115 Rathfarnham Road, the R114 Rathfarnham Road, Terenure Road East, Rathgar Road, Rathmines Road Lower, Richmond Street South, Camden Street Upper and Lower, Wexford Street, Redmond’s Hill, Aungier Street, South Great George’s Street and terminates at Dame Street. The Core Bus Corridor is also routed along the R137 Tallaght Road, commencing east of the M50 junction 11 interchange and is routed via the R137 along Tallaght Road and Templeogue Road, through Templeogue Village, terminating at Terenure Cross. In addition to the above, alternative cycle facilities are provided along Harold’s Cross Road / Terenure Road North between Terenure Cross and Parkview Avenue, as well as along Bushy Park Road, Wasdale Park, Wasdale Grove, Zion Road and Orwell Road, all in the County of Dublin and within the Dublin City Council (DCC), South Dublin County Council (SDCC) and Dún Laoghaire-Rathdown County Council (DLRCC) administrative areas, comprising inter alia:*

- 17.4 km (two-way) of bus priority infrastructure and traffic management;
- 23.3 km (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 32 junction upgrades and associated ancillary works;
- Provision of 105 new/refurbished raised table side entry facilities;
- Reconfiguration of existing bus stops resulting in 60 number new bus stop facilities;
- Public Realm works including landscaping, planting, street furniture, street lighting, boundary walls and sustainable urban drainage (SUDs) measures;
- Roads associated earthworks including excavation of unacceptable material, importation of material and 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 treatments and ancillary grading and landscaping works;

*together with all ancillary and consequential works associated therewith..”*



An overview of the Proposed Scheme is presented in Figure 1 below.

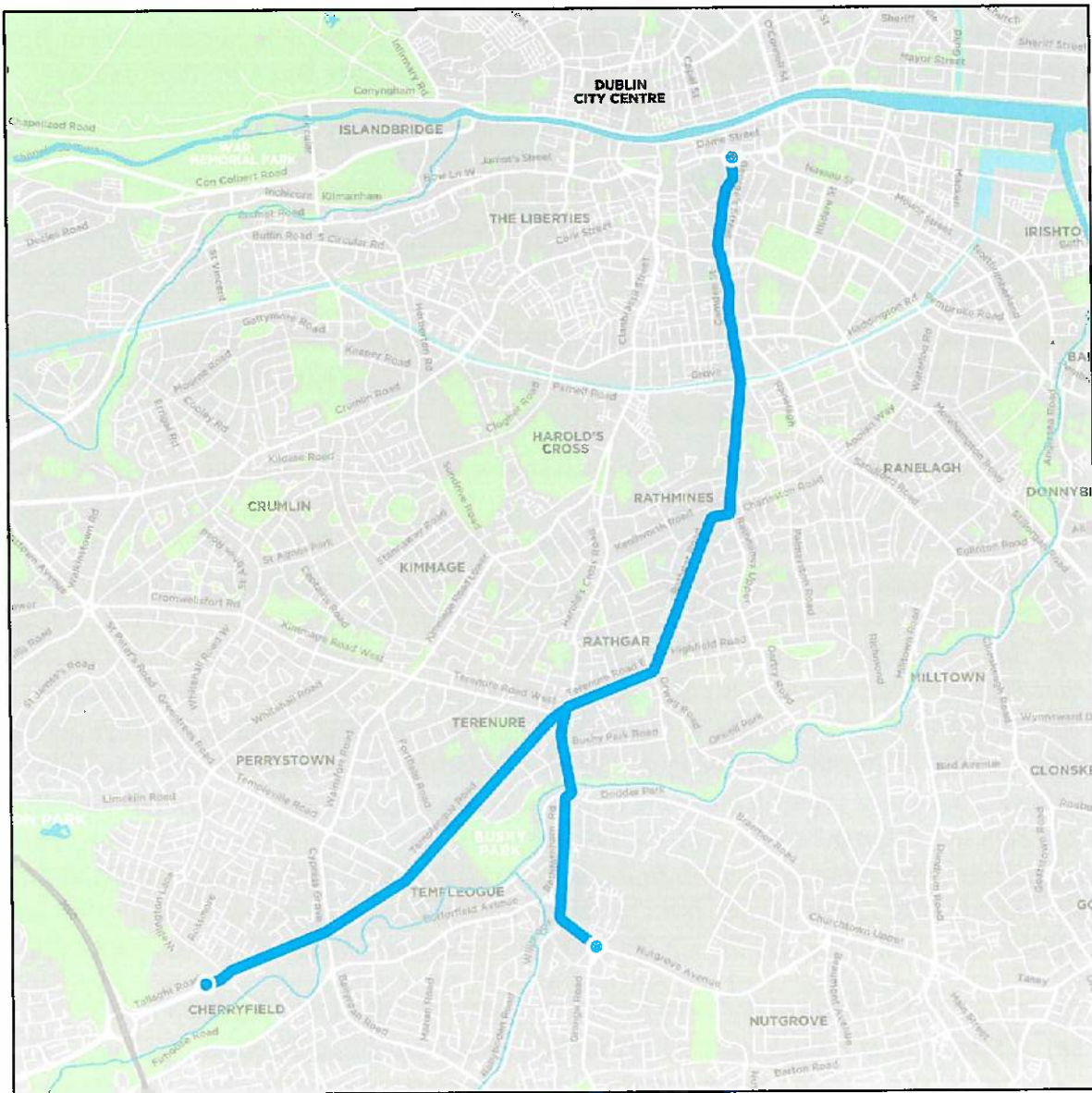


Figure 1 Overview of Proposed Scheme (source: <https://templeoguerathfarnhamscheme.ie/>)

## SDCC Development Management Section

The South Dublin County Development Plan 2022-2028 is generally in favour of the principle of the proposed scheme, with a supportive policy context as outlined below:

### South Dublin County Council County Development Plan 2022-2028 - Policy Context

#### Policy SM1:

Promote ease of movement within, and access to South Dublin County, by integrating sustainable land-use planning with a high-quality sustainable transport and movement network for people and goods.

**SM1 Objective 1:**

To achieve and monitor a transition to more sustainable travel modes including walking, cycling and public transport over the lifetime of the County Development Plan, in line with the County mode share targets of 15% Walk; 10% Cycle; 20% Bus; 5% Rail; and 50% Private (Car / Van / HGV / Motorcycle).

**SM1 Objective 3:**

To support the delivery of key sustainable transport projects including DART and Luas expansion programmes, BusConnects and the Greater Dublin Metropolitan Cycle Network in accordance with RPO 5.2 of the RSES / MASP.

**SM1 Objective 4:**

To ensure that future development is planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe and attractive street environment for pedestrians and cyclists, in accordance with RPO 5.3 of the RSES / MASP.

**Policy SM3: Public Transport**

Promote a significant shift from car-based travel to public transport in line with County targets and facilitate the sustainable development of the County by supporting and guiding national agencies in delivering major improvements to the public transport network.

**SM3 Objective 1:**

To achieve and monitor a transition to the County mode share targets of 20% Bus and 5% Rail.

**SM3 Objective 3:**

To ensure that future development is planned in such a manner as to facilitate a significant shift to public transport use through pursuing compact growth policies, consolidating development around existing and planned public transport routes and interchanges, and maximising access to existing and planned public transport services throughout the network.

**SM3 Objective 4:**

To optimise accessibility to public transport, increase catchment and maximise permeability through the creation of new and upgrading of existing walking and cycling routes linking to public transport stops.

**Policy SM3: Public Transport – Bus****SM3 Objective 11:**

To facilitate the delivery of the BusConnects Core Bus Corridors and seek additional bus corridor and orbital routes to serve the County by securing and maintaining any required route reservations and to ensure the BusConnects Corridors do not adversely affect the village life and livelihoods of any of our County Villages.

**SM3 Objective 12:**

To work with the NTA to secure the expansion of the bus network, including distinct new bus networks as necessary, to serve new development and regeneration areas within the South

Dublin County area including Tallaght, City Edge, Adamstown, Clonburris, Fortunestown, Ballycullen and Newcastle.

**SM3 Objective 17:**

To work with the NTA and other state agencies to facilitate the delivery of the Kennelsfort Road-R148 grade separated junction or an equivalent solution to maximise the efficacy of the BusConnects Project.

**SM3 Objective 18:**

To liaise with bus service providers where new bus stop infrastructure is proposed in order to ensure facilities such as shelters and bins are included, where appropriate.

**The SDCC Development Management Section have provided the following comments;**

- The proposed scheme would be very welcome as it will support more efficient and intensive use of brownfield serviced urban sites, sustainable and vibrant communities, as well as housing delivery.
- The proposed scheme will provide a good balance between servicing existing communities while not seriously and adversely effecting residential amenities, given its proposed routing
- The proposed scheme is also delivering on the wider remit of smarter travel given proposed improvements to walking and cycling infrastructure. Issues such as tree loss and the loss in carriage width dedicated to cars are decisively outweighed by improved sustainable transport opportunities, enhancement of the public realm and knock-on increase in the scope to accommodate higher-density development in the vicinity of this service/route.

## **SDCC Traffic and Transportation Section**

**SDCC Traffic and Transportation Comments and Observations:**

There are 2 no. relatively short stretches of the proposed scheme located in the South Dublin County Council Local Authority area.

- One section is from the existing Spawell roundabout to the junction of Fortfield road where the scheme enters the Dublin City Local Authority area.
- The second section in the SDCC area goes from Nutgrove Avenue to Dodder Park road, again where the proposed scheme goes into the Dublin City LA area.

**SDCC Traffic department comments on the Spawell roundabout to Fortfield Road Bus Corridor section:**

**Junction Improvements:**

The traffic and transportation and section welcome the conversion of the Spawell roundabout on the R137 to a traffic-light controlled junction with marked improvements for bus priority, and active travel movements. (Sheet 30 of 42 GA drawings)



**Preservation of Existing Stone Arch:**

The traffic section welcome the preservation the stone arch and the opening of this amenity to the public. (Sheet 30 of 42 GA drawings)

**Cycle Track Alignment:**

There are quite severe changes in direction of the cycle track around the back of the proposed inbound bus stop (Sheet 31 of 42 GA drawings)

**Traffic Safety at Corrybeg Junction:**

Currently, there is an existing no right turn exiting out of the Corrybeg estate. This no right turn exiting the Corrybeg estate must be maintained for traffic safety reasons.

**Traffic Safety at Old Bridge Road Junction:**

The traffic section are pleased that the existing right turn ban for all vehicles coming from the Old Bridge Road except buses is remaining. (Sheet 32 of 42 GA drawings)

**Proposed Shared Area:**

The traffic section are supportive of the shared area in front of no. 258 to no. 252 Templeogue road being retained for access to these dwellings. (Sheet 32 of 42 GA drawings)

**Cycle Track Alignment:**

The proposed cycle track has sharp changes in direction in the vicinity of the Springfield road junction. (Sheet 34 of 42 GA drawings)

**SDCC Traffic department comments on the Nutgrove Avenue to Dodder Park Road Bus Corridor section:**

**Rathfarnham Caste Wall:**

The traffic Section have received significant negative feedback in relation to the Nutgrove Avenue /Grange Road set back of the existing wall and possible loss of mature trees as illustrated in Figure 2 and detailed on **(General Arrangement drawing: 1 of 42)**

Significant mitigation measures are required to make up for the loss in biodiversity at this location.



*Figure 2 Nutgrove Avenue /Grange Road*

**Possible Traffic Congestion at peak times:**

The proposal involves loss of the left turning lane northbound into Butterfield Avenue. Traffic queued on two lanes now only will have one lane. The traffic signal timings at the Butterfield Avenue junction need careful consideration to avoid long tail backs passed the previous junctions at St Marks Avenue and Willbrook Road. **(General Arrangement drawing: 1 of 42)**

**Scheme Tie In:**

The proposed Core Bus corridor scheme should tie seamlessly into the SDCC Dodder Greenway cycle scheme.

**Temporary Construction Compound:**

There are concerns about the location of the proposed temporary compound in Woodview Cottage Green. Its location is believed to be too close to residential properties and the location has been a well-used amenity area for a long time. The other aspect raised by residents in relation of the siting of the temporary compound is the dangers posed siting a compound with the associated HGV traffic in a busy residential area.

If no alternative location can be identified, the NTA propose upgrade works to improve the amenity value of the green space in compensation for its temporary loss to residents. See Figure 3 below: **Woodview Cottage Green**



Figure 3 Woodview Cottage Green

### **Land Management:**

SDCC encourage further discussion between NTA and SDCC on the exact parcels of public land identified within the scheme. Also on additional CPO plots, we would like discussion on the hand on of such lands into LA management, and the particular maintenance implications of such additional infrastructure and land bank. In summary, we need complete clarity on what land will become public realm after the scheme is completed and the maintenance implications of such lands.

### **Construction Traffic Management:**

SDCC see that detailed Construction Management Plans (CMP) are necessary to ensure the efficient and safe delivery of this project. The level of detail required for such CMP's is laid out below:

**The Construction Management Plans shall be managed in accordance and contain the elements listed below:**

*Construction traffic arising from the site shall be managed in accordance with a method statement for the management of the construction phase in accordance with an agreed site-specific Construction Traffic Management Plan that fully accords with requirements of the Council's Traffic Section.*

*In this regard within a maximum of two weeks from the date of any Commencement Notice within the meaning of Part II of the Building Control Regulations 1997 and prior to the commencement of works on site the applicant, owner or developer shall lodge with the Planning Authority:*

- (i) A site-specific Construction Traffic Management Plan that accords with the Council's Traffic Section requirements, and;*
- (ii) The written confirmation of the Council's Traffic Section of their agreement to the Construction Traffic Management Plan, and;*
- (iii) A written commitment from the developer to carry out the development in accordance with this Construction Traffic Management Plan, and;*

*(iv) These requirements have been acknowledged in writing as acceptable by the Planning Authority.*

*The required Construction Traffic Management Plan shall include:-*

*(i) Details of the agreed number, location and use of suitable facilities for vehicle cleansing and wheel washing provided on site prior to commencing of construction and a written commitment that such facilities will be maintained in a satisfactorily operational condition during all periods of construction, and;*

*(ii) Location of all on-site car parking facilities provided for site workers during the course of all construction activity, and;*

*(iii) Provision for dust suppression measures in periods of extended dry weather, and;*

*(iv) Provision for the flexible use of a road sweeper if an acute situation on the adjoining public road requires it, and;*

*(v) Location of materials compound and site huts, and;*

*(vi) Details of security fencing, and;*

*(vii) Name and contact details for site manager, and;*

*(viii) Methodology for the use and control of spoil on site during construction, and;*

*(ix) Details of access arrangements/routes to be used by construction traffic, to include details of arrangements to manage potential conflicts with site specific issues i.e. schools, playing pitches etc.*

*(x) Measures to obviate queuing of construction traffic on the adjoining road network. In this regard the applicant owner or developer shall consult with the Council's Traffic Section before any works are carried out, and;*

*(xi) Details of measures to protect watercourses on or adjoining the site from the spillage of deposit of clay, rubble or other debris,*

*(xii) Alternative arrangements to be put in place for pedestrians and vehicles in the case of the closure of any public road or public footpath during the course of site development works;*

*The plan should also be informed by any Project Construction Waste and Demolition Management Plan required to be prepared and agreed that addresses intended construction waste management and any traffic issues that may arise from such a plan.*

*A record of daily checks that the works are being undertaken in accordance with the site-specific Construction Traffic Management Plan shall be kept for inspection by the Planning Authority.*

*Storage of construction materials is not permitted on any public road or footpath, unless agreed in writing with the Planning Authority, having regard to the prior reasonable justification and circumstances of any such storage.*

#### **Summary of SDCC Traffic Comments:**

SDCC are broadly supportive of the proposal and are of the view that it aligns with the policies of the County Development Plan (2022 – 2028). The scheme supports the National Development Plan, RSES, and the **Transport Strategy** for the Greater Dublin Area, (2022-2042). In particular, the scheme supports the sustainable movement policies within this strategic plan.

In addition, the proposed Templeogue / Rathfarnham core bus corridor scheme supports the actions contained in the latest Climate Action Plan 2023. Contained within this document is the statement “*the NDP continues the Programme for Government commitment to rebalance the share of capital expenditure to favour new public transport schemes over road projects.*”



The comments provided in this SDCC submission report are mainly focussed on the construction management controls and minor design details of the scheme. To date many of our concerns have been addressed through the extensive consultation process that has been conducted by the NTA with the various stakeholders in our Local Authority area.

## SDCC Roads Maintenance Section

**The SDCC Roads Maintenance Section have provided the following comments;**

- 1) All works to be constructed as per TII specifications unless agreed separately with SDCC Road Maintenance.
- 2) Precast kerbing is **NOT** to be permitted , except by express permission of SDCC Roads Maintenance Department.
- 3) Road Structure of bus bay is to be 300mm thick reinforced concrete slab with a geogrid overlapping the joints. 60mm Binder Course and 40mm Surface Course. To be laid over the slab. This requirement is to account for the hydraulic loading at bus stops that has caused surface deformation.
- 4) Drainage system to be designed using SuDS.
- 5) Signage to be kept to a minimum to avoid street clutter.
- 6) The delivery of enhanced bus and active travel infrastructure is supported, however, the works and materials proposed will present an increased financial management issue for the Local Authority who will have responsibility for maintaining this infrastructure into the future.
- 7) Universal Design principles should be employed in the design.

## SDCC Public Realm Section

**SDCC Parks and Landscape Section Comments:**

### **Report on proposed Rathfarnham Bus Connects Corridor proposals:**

The proposed scheme is delivering on a remit of smarter travel with proposed improvements to walking and cycling infrastructure. Issues such as loss in the carriage width dedicated to cars are decisively outweighed by improved sustainable travel opportunities and knock-on increase in the scope to accommodate higher-density development in the vicinity of this service/ route. The decrease in space allocated to private cars could be viewed as advantageous in promoting modal shift.

However, the same cannot be said regarding the issue of the proposed loss of existing trees, and the lack of a comprehensive proposal for new tree planting within the scheme. Tree loss does not equate to loss of vehicular carriageway and the two cannot be co-related. The loss of existing trees and the dearth of proposed new street tree planting impacts on the delivery of smarter travel solutions and the creation of climate-adapted streets. (Inclusion of street trees



and softscape creates a street environment that supports walking and cycling, supports provision of natural SuDS measures and ameliorates heat island affect and air quality that affects active travel users disproportionately. Inclusion of street trees ensures compliance with DMURS.) The low level of proposed tree planting remains a concern. Increased retention of existing trees, additional replacement street tree planting along streets or, where space is not available, at frequent intervals in SDCC's public open space adjacent to streets, is recommended to improve the scheme.

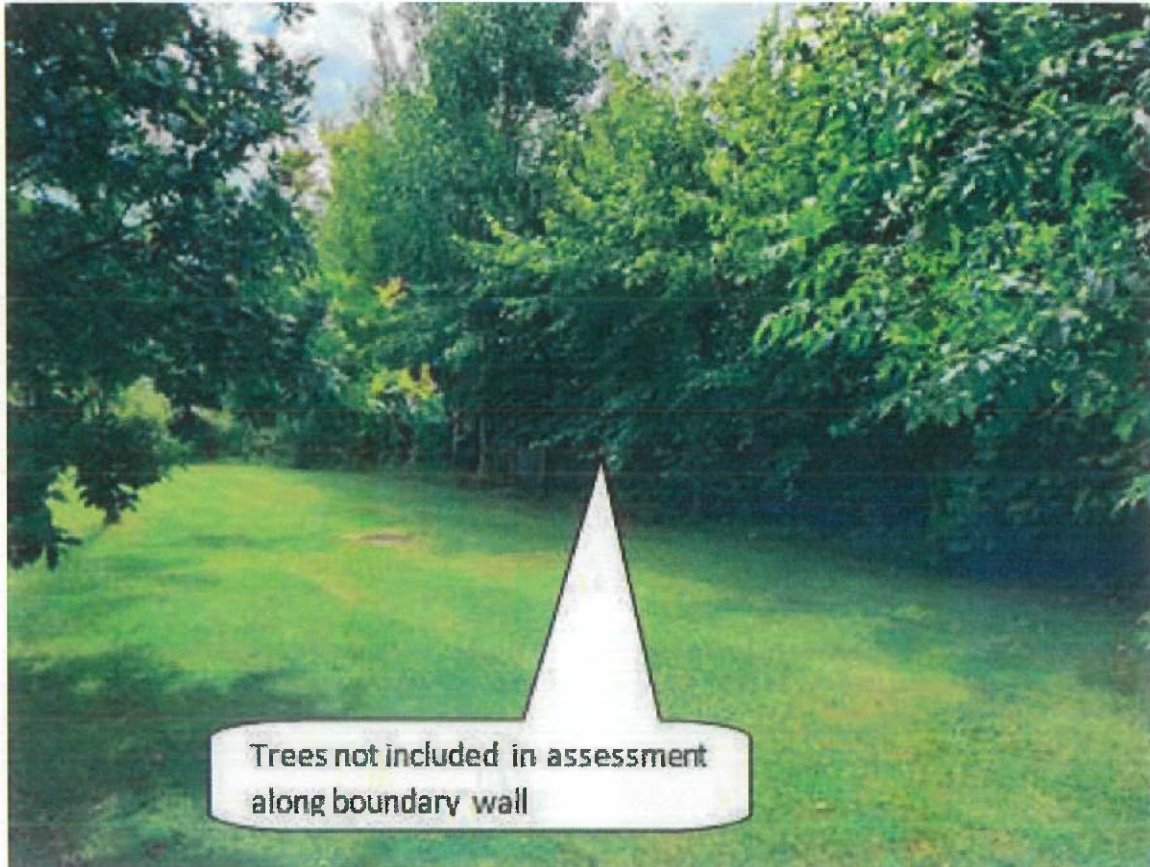
#### **TREES WITHIN RATHFARNHAM CASTLE PARK:**

##### **Issues with accuracy of proposals and impact assessment:**

There are significant issues relating to the assessment of tree loss proposals and SDCC are of the opinion there is an under-estimation of tree numbers impacted by the proposals within the Rathfarnham Castle Park woodland area in particular; there is an over-estimation of potential tree retention and an over-optimistic view of the proposals within the scheme to protect trees proposed for retention.

It is difficult to assess the full impact of the scheme when the proposed tree loss is underestimated; issues in this regard are discussed under A) -E) below:

A) With some exceptions the tree survey within Rathfarnham Castle Park has been mainly confined to the land take for the bus connects corridor. There are trees located outside this land take area with root zones that would extend into the site area which have not been mapped or surveyed. Therefore, the impact of proposed works on these trees has not been fully considered or included in the overall impact assessment. Photograph No. 1 (Figure 4 below) shows existing trees that are within the proposed site boundary which do not feature on the survey mapping.



*Figure 4 Photograph No. 1: shows a line of trees located along Rathfarnham Castle Park's western boundary wall at the northern end which have not been included within the survey drawing.*

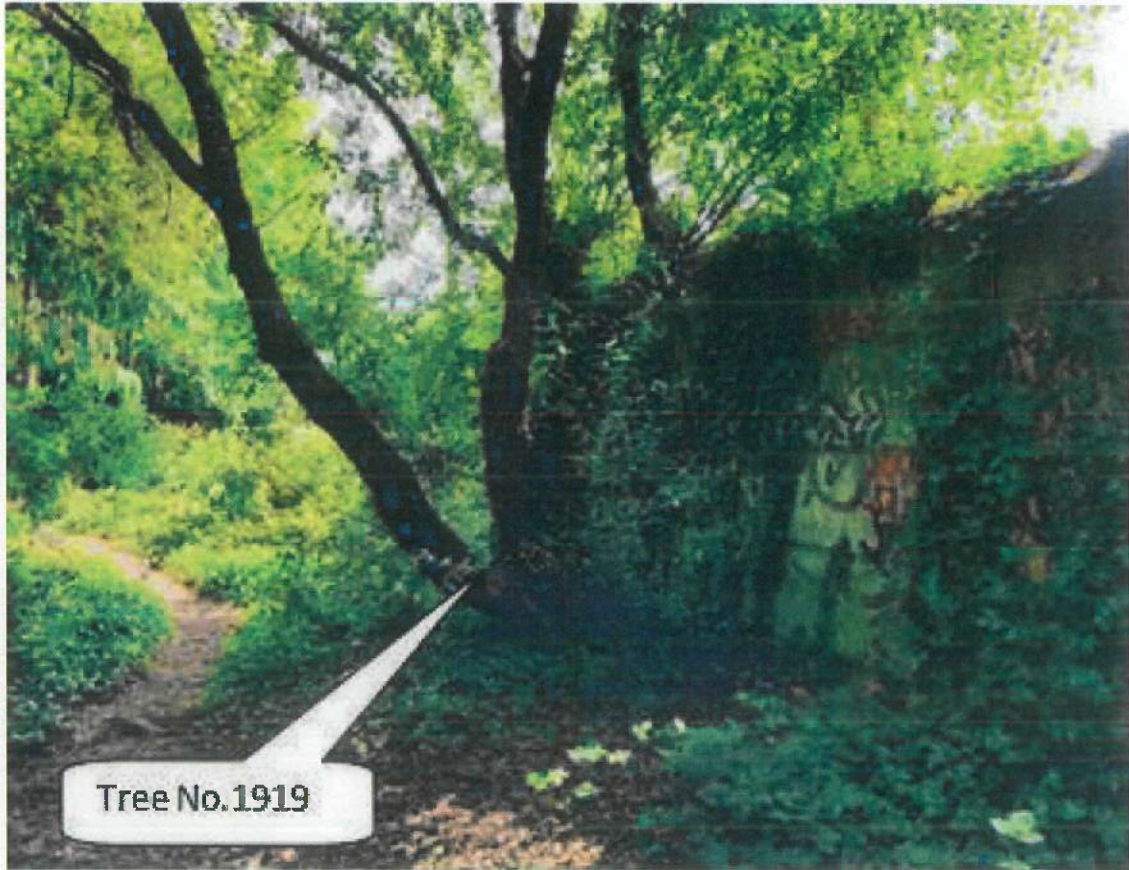


*Figure 5 Photograph No. 2: some of these large size trees are located outside the land take, but would have root zone calculations which would extend into the land take area with possible implications on the health of these trees. Some of these trees have not been picked up on the tree survey or plotted on the topographical survey.*

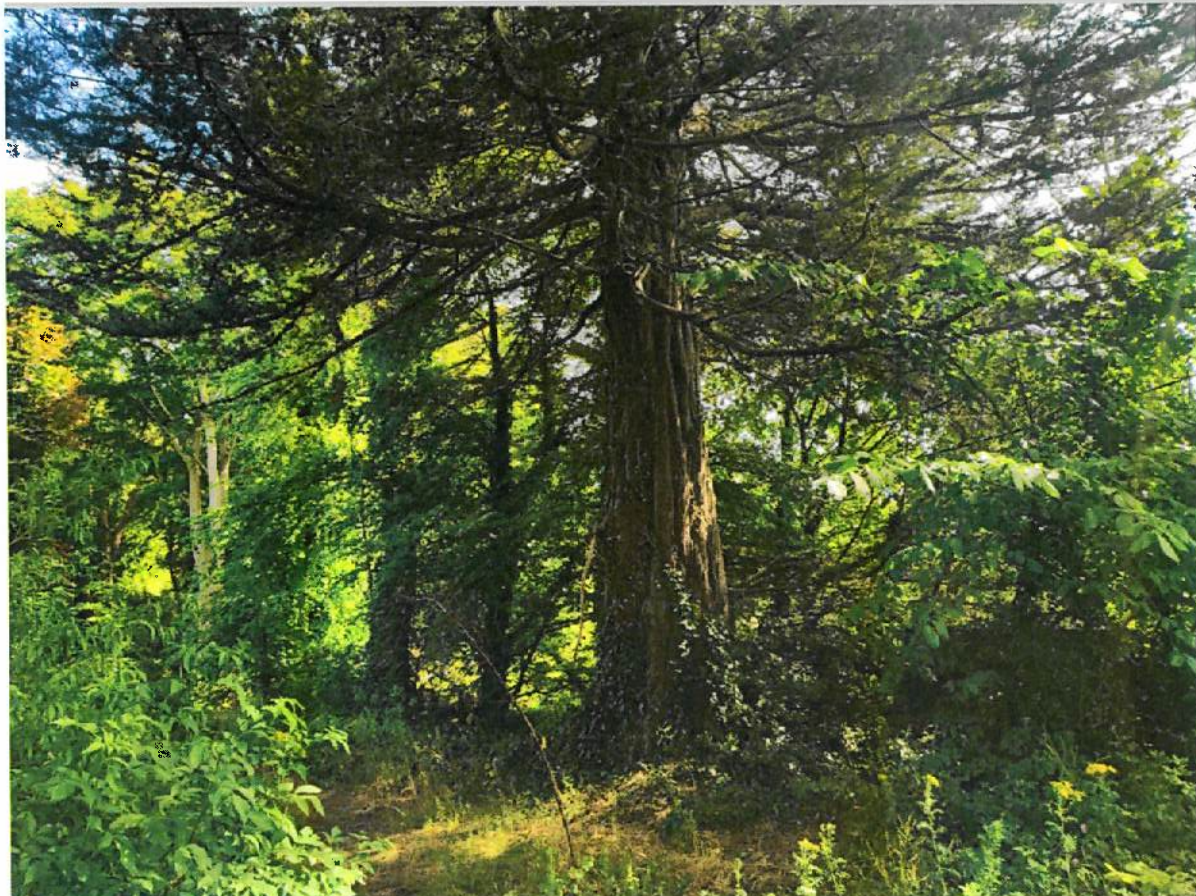
B) The topographical survey does not seem to reflect the accurate position of existing trees. There are areas where tree positions are incorrect, and trees are in reality located closer to the boundary wall than shown on the maps and in other places there are trees located further away from the boundary wall than shown on the maps.

The implications are that some trees are shown for removal which should and could be retained and in other places there are trees shown for retention that can't be retained due to their proximity to the land take or their position within the works area. Photograph no. 3 (Figure 6) shows one such example (Tree No.1919) where the tree is located within the permanent land take area along the boundary wall, but is shown on the drawings as being further back and to be retained, which is unlikely to be possible.





*Figure 6 Photograph No. 3: shows Tree No. 1919 growing tight to the boundary wall, but shown on the tree survey drawing in a different location and marked for retention.*



*Figure 7 Photograph No. 4: One location within Rathfarnham woodland, which has a greater number of trees than the 16 No. trees marked on the tree survey drawing for this location.*

C) The tree report suggests that where walls are proposed within the root zone of retained trees, that a pad/pile and raft type foundation would be considered. The feasibility of this is yet to be established. There appears to be a lack of consideration given to the existing and proposed ground levels. Along some sections of the site, the existing ground levels are higher on the park-side of the wall than those on the road-side. In order to construct to the finished levels on the road-side, the ground levels will need to be lowered inside the park and the excavations to facilitate these works will need to extend inside the line of the proposed wall and into the root zones of trees shown for retention. As a result, use of a pad/ pile and raft type foundation will be ineffective to protect those trees from excavation within the root zone. Where levels are incompatible those trees will require removal if the project is to progress.

D) The documentation proposes a 'No-Dig' type construction would be used to minimize impact on these trees shown for retention where surfaces will run through the root zones of trees to be retained. However due to the undulating nature of the ground within the park where trees are proposed for retention, in order to install these surfaces, in some locations it will be necessary to excavate down to match the finished ground levels of these path surfaces so they match the levels on the roadside. This excavation will be within the root zone of trees marked for retention and would result in root damage to trees marked for retention and their removal will be necessary as part of the works. Conversely in other locations the build up on top of the tree roots would be excessive and also lead to doubts about the feasibility of those trees being safely retained.



Photographs 4 and 5 (Figure 7 and Figure 8) show the variation in ground levels within Rathfarnham Castle Park that make achieving C) and D) challenging and unlikely in some locations



*Figure 8 Photograph No. 5: showing an area of the park inside the boundary wall below the adjacent roadway; build up on top of tree roots proposed for retention would be significant.*





*Figure 9 Photograph No. 6: shows the ground levels on the inside of the boundary wall of Rathfarnham Castle Park, within the site area; at this location there is a sharp drop from tree level down to the existing roadside level making 'no dig' proposals challenging.*



E) Site Services are proposed within the path surfaces including surface water. These are shown within the path surface close to the new erected wall and within root zone of trees listed to be retained.



Figure 10 Image 1: shows services to be installed in the footpath & Cycle path outside the position of the new boundary wall, within the rootzone of trees scheduled for retention.

Notwithstanding the under-reporting of expected tree loss and impact, the EIAR for this section reports: “The magnitude of change in the baseline environment is very high”

The report also states there is negative effects from the loss of trees being removed at the construction stage from Rathfarnham Park, with continuing adverse effects.

The proposal does not replace the trees lost.

*“A number of habitat types considered to be of Local Importance (Higher Value) will be lost as a result of the Proposed Scheme. These include relatively small areas of (mixed) broadleaved woodland (WD1), scattered trees and parkland (WD5), hedgerow (WL1), and treeline (WL2) habitats. The overall total areas of the habitat types which overlaps with the Proposed Scheme boundary and be directly lost as a result of the construction of the Proposed Scheme is provided in Table 12.14. It should be noted that the extent of tree loss is calculated across the length of the Proposed Scheme and is captured under treelines (WL2) as the majority of habitat loss affects this habitat type. However small numbers of these trees may be lost from the habitat classification (mixed) broadleaved woodland (WD1). This distinction is considered in the habitat loss impact assessment. The permanent loss of such habitat types which are considered to be of Local Importance (Higher Value) has the potential to affect the conservation status of each of these habitat types and, therefore, result in a significant negative effect at the local geographic scale.”*

The impact of the proposed works on the woodland block within Rathfarnham Castle Park will be greater than what has been indicated within the submitted documentation. More trees than indicated are likely to be removed to facilitate the proposed works and the woodland edge removal (unquantified at present) will have a knock-on effect on the woodland including its biodiversity, amenity and quality.

Trees previously sheltered within the woodland area will be exposed to woodland edge conditions because of the removal of the existing outer canopy trees. These trees would be habituated to shelter and will move from a low risk to a high risk (direct user contact) category. SDCC are likely to remove many of these newly exposed trees in the years ahead causing an additional on-going impact that has not been quantified.

**Recommendation:**

At present SDCC do not have enough information to adequately quantify the numbers of trees that will be lost in Rathfarnham Castle Park woodland, the impact of the tree loss on the woodland, biodiversity, visual amenity and landscape is therefore not calculable and the mitigation that would be required to decrease any impact is not possible to quantify or assess. We are strongly of the opinion that further assessment is required with regard to the proposals along and within the boundary of Rathfarnham Castle Park.

The tree survey and report should be reviewed to include all trees impacted by the proposals, the topographical survey should be reviewed to ensure trees are accurately positioned and to ascertain the feasibility / likely success of any proposed no-dig proposals. The arboriculture impact assessment should undertake a realistic assessment of the proposed works on existing trees, including the review of all levels and services proposals. Co-ordination between the various design disciplines will be required to minimise impact on existing trees.

Once the actual tree loss has been adequately quantified and assessed and, if it is still proposed to proceed with the proposal, SDCC would strongly recommend sufficient replacement woodland habitat be established by agreement with SDCC Public Realm Section, as close as possible to Rathfarnham and in South Dublin County Council area.

**NATURAL SUDS:**

There are concerns with the overall extent of Natural SuDs across the scheme. Where possible this should be increased in line with SDCC's adopted County Development Plan .

A planning condition should be secured seeking the provision of a detailed landscape strategy for agreement with the local authority, demonstrating how natural SUDS using swales and nature-based solutions will be incorporated and maximised across the scheme. This would help create ecological links and decrease urban heat island effect. See requirements for same in SDCC's County Development Plan. (Policies under G14 copied below). Attention is drawn to SDCC's SUDS design manual in relation to Natural Based Suds, which is required to be implemented under the county development plan policy: <https://www.sdcc.ie/en/climate-action/spotlight-sustainable-drainage-systems/suds-evaluation-guide.pdf>

### Recommendation:

There is an opportunity to include Natural Based Urban Drainage particularly in areas where the road is being completely re-aligned e.g. the entire Rathfarnham Road. ABP are requested to require the project include natural based urban drainage systems such as rain gardens, swales SuDS Tree pits in accordance with SDCC's Guidelines for natural based drainage policies (G14 policies copied below refer).

### CONSTRUCTION COMPOUNDS:

Construction Compounds are proposed for public realm areas as set out below. SDCC question the need for CPO, either temporary or permanent, for proposed temporary works. In normal practice, contract managers liaise with the County Council and agree suitable locations, agree reinstatement and mitigation measures directly with the Council. SDCC Public Realm; managers to the lands discussed below; were not consulted in relation to the proposed CPO of these lands for works compounds and did not agree to them.

- **Construction Compound TR1:** To be located south of the Spawell roundabout, at the Tallaght Road / Spawell Link Road junction (Ch.J620 to Ch.J650). A permanent CPO is proposed.

### Recommendation:

SDCC strongly object to, and recommend ABP not grant, a permanent CPO at this location. A permanent CPO is unnecessary and SDCC expect this land to be returned to SDCC in good condition at the completion of construction stage. Location of compound, mitigation and reinstatement measures to be agreed with SDCC public realm section by local agreement rather than CPO.

- **Construction Compound TR3:** To be located along Dodder View Road, in the open space area between Dodder View Road, Woodview Cottages and Church Lane. Site extents are limited to avoid any direct impacts on existing trees. (off-chainage). See Figure 11 below:

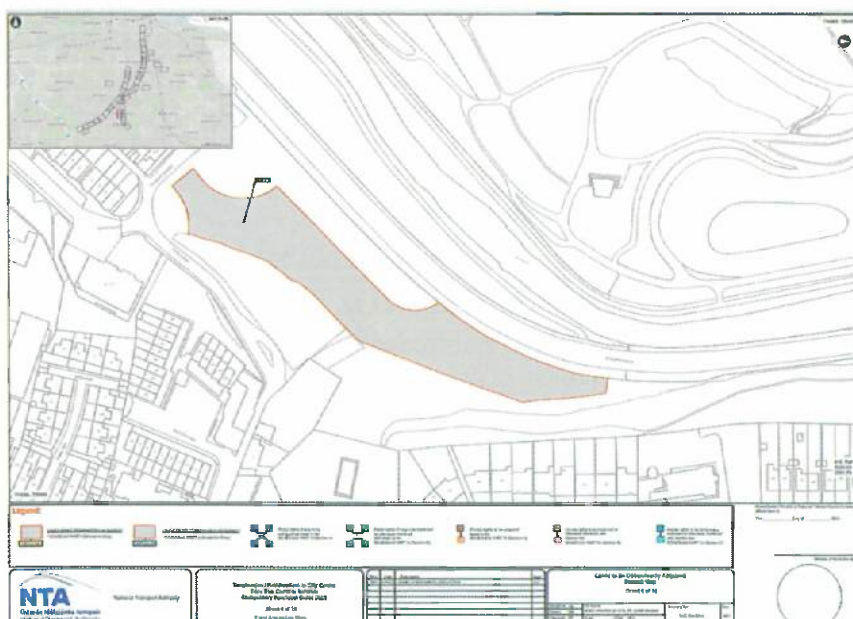


Figure 11 Construction Compound TR3



**Recommendation:**

The proposed compound location above is in the Dodder Valley and is close to the site of an existing term-limited, temporary construction compound where SDCC have agreements regarding full reinstatement of the compound area to planted, landscaped parkland. The above shown extent is excessive and occupies the majority of the usable parkland at this location. SDCC public realm do not recommend ceding of this important location with a temporary CPO. SDCC recommend that the extent of the proposed compound should be limited to the existing compound location on site, and the extent, mitigation and reinstatement measures are to be agreed with SDCC public realm section by local agreement rather than CPO.

- Construction Compound TR6: To be located on Spawell Link Road, between Spawell Roundabout and Firhouse Road (off-chainage). See Figure 12 below:

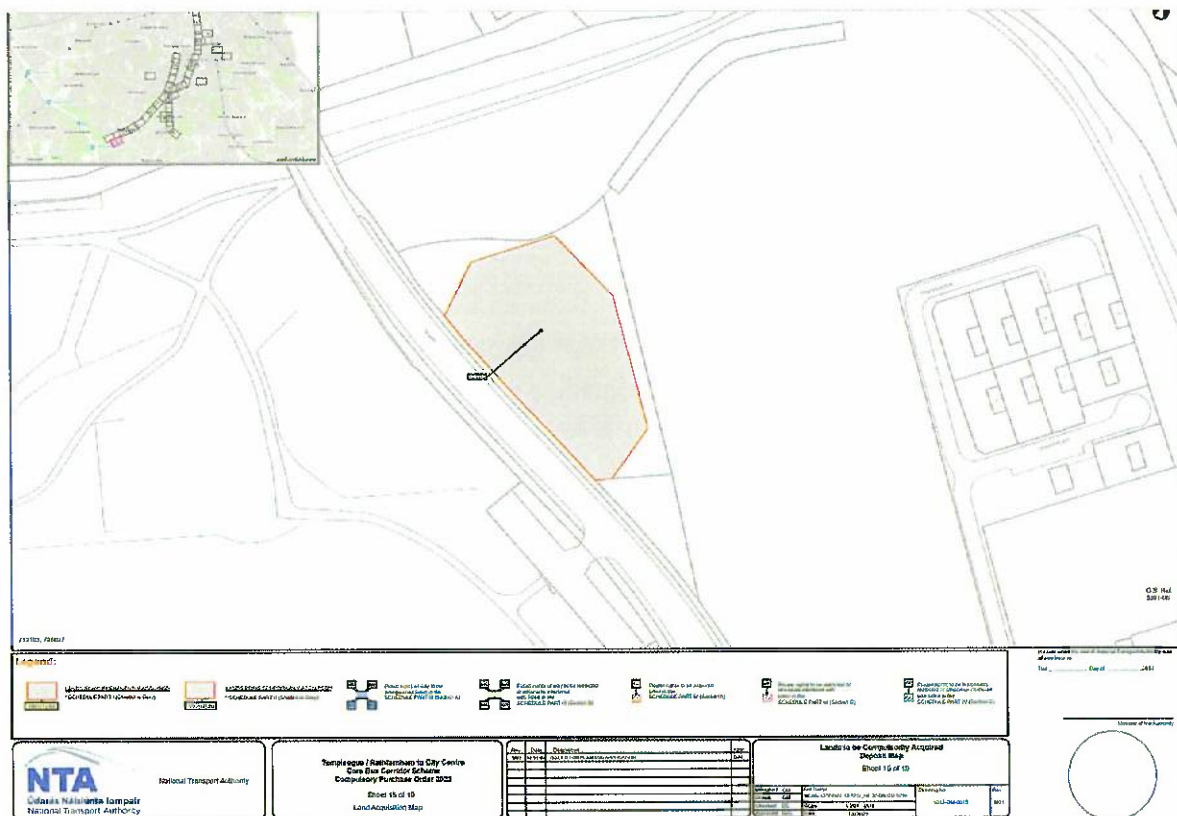


Figure 12 Construction Compound TR6

**Recommendation:**

This location is in the Dodder Valley and is the site of an existing term limited and temporary construction compound where SDCC have agreements regarding full reinstatement of the compound area to planted, landscaped parkland. SDCC public realm do not recommend ceding of this important location with a temporary CPO. SDCC recommend that the extent, mitigation and reinstatement measures are to be agreed with SDCC public realm section by local agreement rather than CPO.



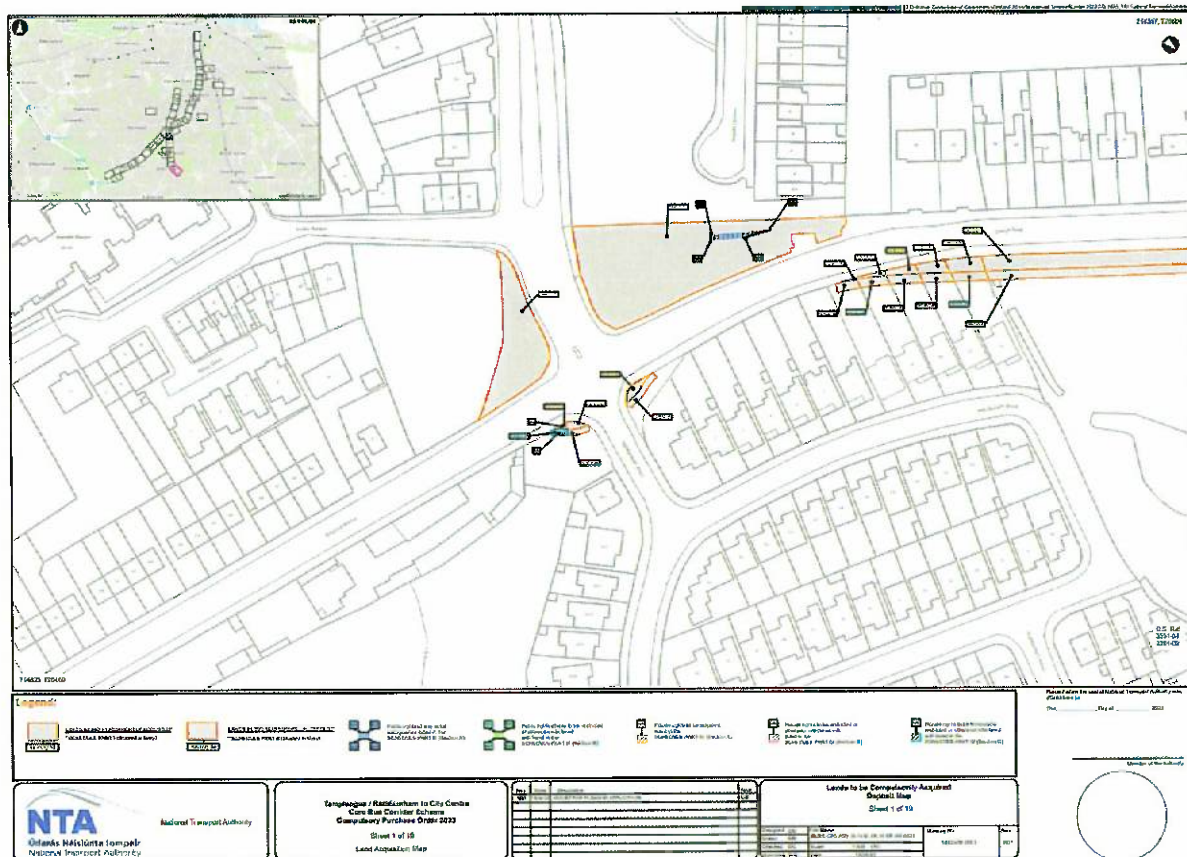


Figure 14 CPO

There are a number of CPOs at this junction above, with a proposal to permanently CPO the lands either side of the south side of the junction. It is unclear why this is required; as the areas in question do not appear within the general arrangement or landscape drawing having any permanent NTA related proposals.

**Recommendation:**

There is no purpose to be serviced by the loss of this land to the NTA, it is recommended not to grant a permanent CPO at this location.

**Rathfarnham Castle Park:**

The earlier part of this report documented the significant impact on existing trees at this location, but the loss of parkland and amenity should also be fully considered. There is a significant proposed loss of public parkland at this location with a permanent change of parkland to vehicular carriageway; with little in terms of proposed mitigation:

*“Substantial changes to existing road corridor most notably at Rathfarnham Castle (with permanent land acquisition, continued effects from loss of trees and plantings removed during the Construction Phase, and setting back of section of boundary walls and railings (Ch.A150 to Ch.A600)” EIAR Chapter 17 Page 27*



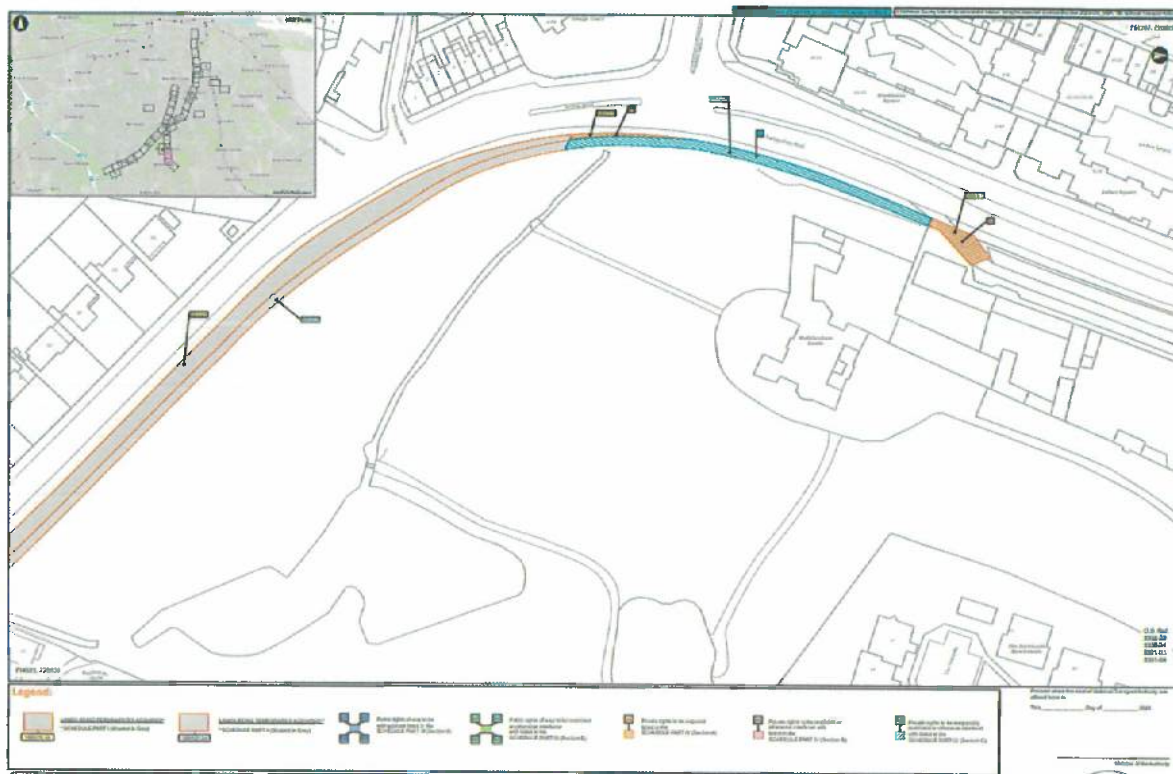


Figure 15 CPO

There is also a proposed temporary CPO of land to build the works impacting on Rathfarnham Castle Park.

During Construction Works:

*“Up to 10m width from an approximately 400m long section of existing roadside grounds at Rathfarnham Castle, including removal of roadside trees, boundary wall and entrance to grounds / park opposite Yellow House” EIAR Chapter 17 Page 25*

### Recommendation 1:

If granted the applicant should be requested to agree with South Dublin County Council compensatory and mitigation measures within SDCC public open space for the significant loss of landscape and amenity in South Dublin County Council lands.

### Recommendation 2:

The existing exit from the Rathfarnham Castle Park car park is proposed to be permanently CPO'd with private rights to be acquired. SDCC do not support the CPO at this location and can agree to works locally if same is required.

**CPO at junction of Rathfarnham Main Street and Rathfarnham Road:**



Figure 16 CPO

SDCC public realm are unsure why there is a permanent CPO proposed the junction of Rathfarnham Main Street and Rathfarnham Road shown above, the CPO is located in a section of the plaza at the old Graveyard entrance. There does not seem to be any relevant proposals in the general arrangement drawing for this area that require a CPO. This is the access route for maintenance to the historic graveyard and is used by local traders for on-street display. There does not seem to be any requirement for the NTA to CPO this land.

**Recommendation 1:**

SDCC request that ABP do not grant a permanent CPO at this location.

**Recommendation 2:**

This plaza area was improved during a recent village improvement scheme, a number of these relatively recent interventions will be affected by the proposal including the removal of newly planted trees. This scheme does not include a compensatory landscape layout for the area and ABP are requested to consider applying a condition for the NTA to agree with SDCC Public Realm and Roads Maintenance Depts a landscape proposal for this area to provide replacement trees, incorporation of natural SuDS and other landscape interventions at this high profile location at the entrance to Rathfarnham Village.

**Dodder Greenway tie-in at Pearse Bridge. Drawing No. 1012-DM-0005 Rev M01. CPO reference 1068 (1).1f.**



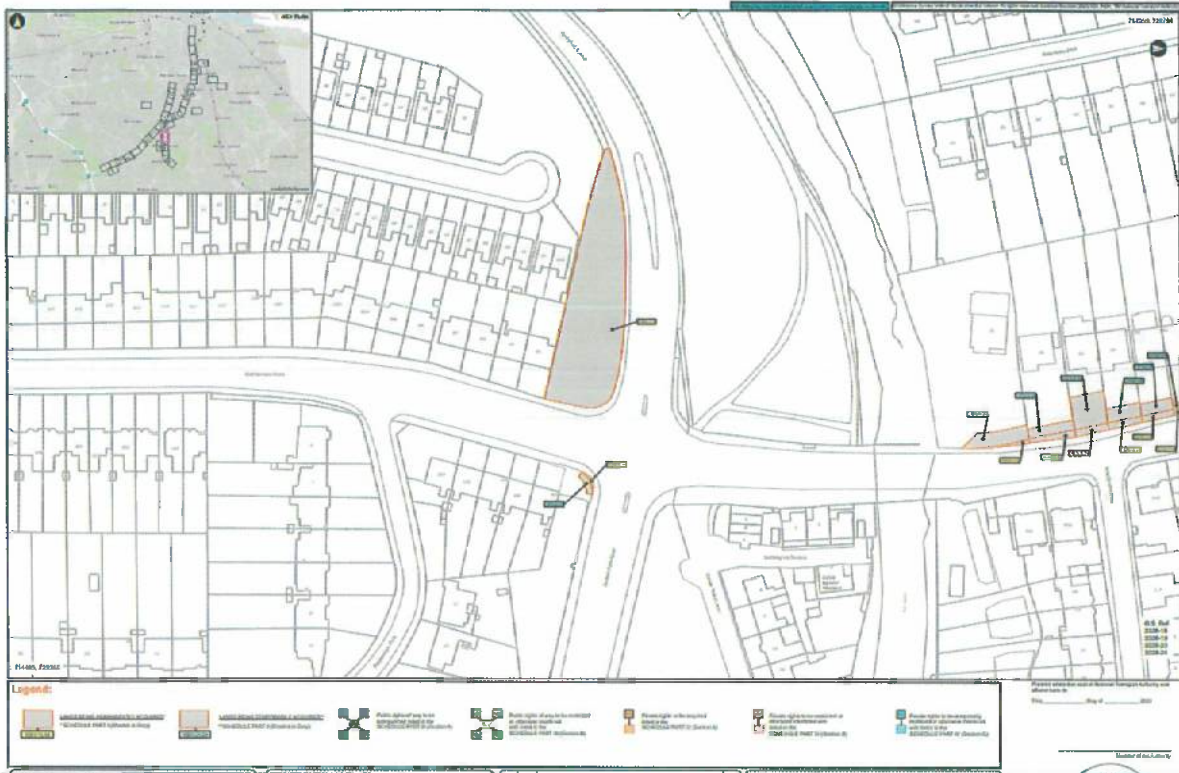


Figure 17 CPO

SDCC note the extent of permanent CPO at Pearse Bridge location to the south-west of the junction above. The proposal for a permanent CPO at this location is extensive and excessive. There are no proposals on the landscape plan nor in the general arrangement plan that would require NTA to be in control of these lands for any purpose whatsoever. SDCC Public Realm have not been made aware of any requirement for the use of these lands by the NTA.

**Recommendation:**

It is strongly recommended that ABP do not approve the proposed permanent CPO of these lands.

**PROPOSED BOUNDARY TREATMENT AT RATHFARNHAM CASTLE PARK**

The current existing boundary along Rathfarnham Castle Park is not original. It is a mix of different styles and none of them relate to the previously existing boundary. If ABP decide to proceed with the scheme and a new boundary is approved, it will not be constructed at the location of the original wall, the context is utterly changed. SDCC Public Realm is of the opinion that a stone wall, reflecting the type of stone used in the vicinity (e.g. similar to the stone used at Rathfarnham Castle Courtyard Buildings), would better reflect the current context of the castle and the grounds. A stone wall boundary would also help mitigate for loss of landscape and visual amenity at this location, should the overall proposal proceed.

**Recommendation:**

Stone wall boundary to Rathfarnham Castle Park to be agreed with SDCC Public Realm Section and SDCC’s Architectural Conservation Officer.

## **BIODIVERSITY AND ECOLOGY**

Given the under-estimation of impact on trees in Rathfarnham Castle Park SDCC would also request that the impact on ecology also be reviewed for extent and accuracy. It seems highly unlikely that 2 Potential Bat Roost only exist within Rathfarnham Castle Park. In addition the fact that the proposal breaches the park wall and extends into the park proper raises questions regarding the sufficiency of a bat transect remaining outside the park boundary. The removal of the woodland edge will allow light ingress into the woodland proper and the impact on species within the park should have been surveyed and considered in that context.

Pearse Bridge is a suspected location of a bat roost; (please see the amount of bats identified at this location in the bat surveys.) Applicants are requested to re-assess this location for bat roosts. (It is noted some work was done in this regard).

### **Recommendation:**

Review impact of proposals on ecology and biodiversity within Rathfarnham Castle Park and at Pearse Bridge.

## **FEASIBILITY OF PROPOSED STREET TREE PLANTING:**

Over the length of the scheme many trees being removed are in SDCC lands. This is not matched by proposed replacement trees planting in South Dublin within the proposals.

Typical Sections for the streets do not show how trees are being integrated into the street layout, SDCC require clarification of planting details for trees to ensure the feasibility of the proposals. Where Suds tree pits are proposed, the applicant is requested to ensure CBR is reached to protect tree roots and provide stable pavements above.

**A850 to A1000:** trees proposed on western side of the road, seem to be proposed for the middle of the proposed footpath, SDCC request details on the feasibility of proposal.

**Typical Section C-C:** illustrates this area, and does not show trees. SDCC recommend exploring the feasibility of street tree planting at this location.

**The position of trees in conjunction with street lighting:** The existing lights seem to be retained along this section of the street, it is unclear if they are being replaced. The location of lights would have to be co-ordinated with the trees to ensure feasibility of both. This is applicable to the full scheme.

### **Recommendation:**

A requirement for feasible street tree planting proposals. Demonstration to SDCC Public Realm Dept of tree pit proposals with space available for pedestrian, wheelchair, buggies to pass each other. Position of lights versus trees should also be clarified. Rathfarnham Road proposal includes wholesale road realignment and should include natural based SUDS measures within the reconstruction proposals.

## **RELATED POLICIES AND STRATEGIES**

The South Dublin County Development Plan 2022-2028 policy context of relevance to Public Realm is outlined below;

### **Chapter 3 – Natural, Cultural and Built Heritage**

### **Section 3.3.6 Protection of Trees and Hedgerows**

- NCBH11 Objective 3: To protect and retain existing trees, hedgerows, and woodlands which are of amenity and / or biodiversity and / or carbon sequestration value and / or contribute to landscape character and ensure that proper provision is made for their protection and management taking into account Living with Trees: South Dublin County Council's Tree Management Policy (2015-2020) or any superseding document and to ensure that where retention is not possible that a high value biodiversity provision is secured as part of the phasing of any development to protect the amenity of the area.
- NCBH11 Objective 4: To protect the hedgerows of the County, acknowledging their role as wildlife habitats, biodiversity corridors, links within the County's green infrastructure network, their visual amenity and landscape character value and their significance as demarcations of historic field patterns and townland boundaries. (Refer also to Chapter 4: Green Infrastructure).

### **Chapter 4 - Green Infrastructure**

- GI1 Objective 1: To establish a coherent, integrated and evolving GI Network across South Dublin County with parks, open spaces, hedgerows, trees including public street trees and native mini woodlands (Miyawaki-Style), grasslands, protected areas and rivers and streams and other green and blue assets forming strategic links and to integrate and incorporate the objectives of the GI Strategy throughout all relevant land use plans and development in the County
- GI2 Objective 7: To enhance the biodiversity value of publicly owned hard infrastructure areas by incorporating the planting of new trees, grasses and other species, thereby integrating this infrastructure into the overall GI network
- GI5 Objective 3: To ensure compliance with the South Dublin Climate Change Action Plan and the provisions of the Council's Tree Management Strategy.
  - Increase the County's tree canopy cover by promoting annual planting, maintenance preservation and enhancement of trees, woodlands and hedgerows within the County using locally native species and supporting their integration into new development.
  - Identify suitable sites for new urban trees including Miyawaki style mini woodlands, where feasible.
  - Promote the planting of new woodlands and forestry within appropriate open space and park locations within the County.
  - To recognise the value of mature trees in terms of carbon sequestration and amenity over saplings
- GI5 Objective 6: To provide more tree cover across the county, in particular to areas that are lacking trees, with an emphasis on planting native Irish trees as appropriate.

## **Chapter 8 – Community Infrastructure and Open Space**

- COS5 Objective 8: To ensure the design of parks and public open space areas is of high quality; to provide a pleasant setting, accommodate use by people of all ages and abilities, to support life-long activity and good health and well-being by the provision of a balanced mix of active and passive recreation and access to, or view of, nature, ensuring that the design considers:
  - provision of an appropriate mix of hard and soft surfaced areas.
  - enhancement of biodiversity and existing trees and hedgerows.
  - incorporation of water courses, other natural features and existing built heritage into the design of parks and open spaces as appropriate.
  - provision of new planting, landscape features and appropriate site furniture including a variety of accessible, well located and designed seating.

### **Policy GI4: Sustainable Drainage Systems Require the provision of Sustainable Drainage Systems (SuDS) in the County and maximise the amenity and biodiversity value of these systems.**

- GI4 Objective 1: To limit surface water run-off from new developments through the use of Sustainable Drainage Systems (SuDS) using surface water and nature-based solutions and ensure that SuDS is integrated into all new development in the County and designed in accordance with South Dublin County Council’s Sustainable Drainage Explanatory Design and Evaluation Guide, 2022.
- GI4 Objective 2: To incorporate a SuDS management train during the design stage whereby surface water is managed locally in small sub-catchments rather than being conveyed to and managed in large systems further down the catchment.
- GI4 Objective 3: To require multifunctional open space provision within new developments to include provision for ecology and sustainable water management.
- GI4 Objective 4: To require that all SuDS measures are completed to a taking in charge standard.
- GI4 Objective 5: To promote SuDS features as part of the greening of urban and rural streets to restrict or delay runoff from streets entering the storm drainage network
- GI6 Objective 8: To support, in agreement with the delivery authority, the provision of outdoor public water drinking fountains along all new and future dedicated cycleways, promoting reusables and actively incentivising transition from single use plastic.
- GI6 Objective 9: To investigate the potential to plant hedgerows along roads to help mitigate noise and air pollution, and to increase visual amenity and enhance biodiversity.



## **SOUTH DUBLIN COUNTY COUNCIL'S: TREE MANAGEMENT POLICY – LIVING WITH TREES 2021-2026**

The South Dublin County Council Tree Management Policy ‘Living with Trees’ 2021-2026 contains information within Chapter 7 Trees and Development that relates to the retention, protection and planting of trees on development sites.

Policy: The Council will use its powers to ensure that where it is conducive with the objectives of the County Development Plan, and other planning objectives, there is maximum retention of trees on new development sites.

Relevant points within this section include:

The Council is committed to continuously improving the way that tree, biodiversity, and landscape issues are considered in relation to applications for new development. There is increasing pressure to both maximise available development opportunities and at the same time protect and enhance existing landscape and biodiversity features.

- The Council will use its powers to ensure that where it is conducive with the objectives of the County Development Plan, and other planning objectives there is maximum retention of trees on new development sites.
- In the processing of planning applications, the Council will seek the retention of trees of high amenity / environmental value taking consideration of both their individual merit and their interaction as part of a group or broader landscape feature.
- On construction sites all work must be in accordance with British Standard 5837 (2012): Trees in Relation to Design, Demolition and Construction – Recommendations.
- South Dublin County Council will consider the protection of existing trees when granting planning permission for minor and major developments and will seek to ensure the maximum retention, preservation and management of trees, groups of trees and hedges.
- Where development is proposed it is essential that existing trees are considered from the very earliest stages of design and prior to an application for planning permission being submitted. Root systems, stems and canopies, with allowance for future movement and growth, need to be considered in all projects.

## **SDCC Water Services Section**

Water Services have revised the proposed scheme and provided the following comments, in addition Irish Water drawings are appended to this report, with services highlighted in yellow.

All structures should have a setback distance to the outside diameter of surface water sewers as per attached table.

<b>SDCC Minimum Separation Distances from Proposed Building to Surface Water Sewers</b>			
<b>Depth to Invert</b>	<b>Sewer Diameter 225 - 449mm dia.</b>	<b>Sewer Diameter 450 - 749mm dia.</b>	<b>&gt;750mm dia.</b>
< 3m	3m	3.5m	Contact SDCC
3m - 4m	3m	4m	Contact SDCC
4m - 5m	5m	5m	Contact SDCC
5m - 6m	5m	6m	Contact SDCC
> 6m	Contact SDCC	Contact SDCC	Contact SDCC
<b>SDCC Minimum Separation Distances from Proposed Building to Water Features</b>			
Water Courses / Rivers	10m from Top of Bank		
Culverts	10m		
<b>SDCC Minimum Separation Distances from Proposed Building to SuDS Features</b>			
Soakaway	5m		
Swales	5m from Top of Bank		
Tree Pits	5m		
Attenuation System	5m from edge of Tank		
Detention Basin	10m from Top of Bank		

The setback distance for foul and watermain should be as per Irish Water Standards. The links attached below provide Irish Water Standard details regarding separation distances to water and wastewater services.

<https://www.water.ie/docs/connections/faqs/Water-Standard-Details.pdf>

<https://www.water.ie/docs/connections/faqs/Wastewater-Standard-Details.pdf>

The planning authority notes that the Proposed Scheme is located in proximity to a riparian corridor near Cypress Grove Road and Templeogue Road. The riparian corridors of the County include rivers, streams and other watercourses and are important for water quality as well as providing green infrastructure and biodiversity links. It is strongly recommended to review Sections 4.2.2 and 11.3.1 for relevant policy and objectives. In addition, development within or affecting riparian corridors are required to meet the criteria specified in Section 12.4.3.

## **SDCC Architectural Conservation Section**

### **Appraisal**

The Templeogue Rathfarnham to City Centre section of the Proposed Scheme has been assessed in relation to the possible or direct impacts on Architectural Heritage and those works impacting on Protected Structures or within Architectural Conservation Areas.

The Proposed Scheme will be comprised of two main alignments, namely from Templeogue to Terenure (3.7km), and from Rathfarnham to the City Centre (6.3km). The Templeogue to Terenure section will commence on the R137 Tallaght Road, east of the M50 junction 1. This Section has assessed with reference to Appendix A16.1 Historical Background and Appendix A16.2 Inventory of Architectural Heritage Sites in Volume 4 of the Environmental Impact Assessment Report.

It should be noted that SDCCs Architectural Conservation Officer has been involved in discussions regarding the proposed route and the different options presented by ARUP in relation to the proposed scheme. In particular lengthy conversations and meetings have taken place in relation to two Protected Structure sites within SDCC, The Gothic Arch at Templeogue (RPS Ref. 244) and Rathfarnham Castle (RPS Ref. 221) which are detailed further in the assessment of the proposed development by the undersigned.

Landscape and urban realm design works are detailed in in Section 1 of the Proposed Scheme. The designed areas of the proposed scheme will incorporate the mid-18th century stone archway (Gothic Arch) at Templeogue Road. The old archway is part of the wider planned Baroque landscape of Templeogue House Demesne and is designated as a Protected Structure (RPS Ref. 244). Following conservation and repair works, soft and hard landscaping with tree planting. The Gothic Arch will be opened to the public and will substantially contribute to the character of the area through the reintegration of this historic landmark into the urban realm. Proposals include a high-quality paving scheme which is sympathetic to the aesthetic of the Arch. Areas of seating and ornamental planting will be provided to enhance sense of place and provide opportunities for passive recreation.

As part of the design concept ARUP commissioned a condition assessment of the Gothic Arch by a conservation engineer in order to assess the structure and determine the repair works required as part of the overall scheme, vegetation was also removed at that time by a conservation contractor. The proposed works to include the conservation and repair of the Gothic Arch are welcomed along with the overall public realm design works ensuring the Arch is integrated into the design allowing it to be fully appreciated within the current landscape.

The pre-mitigation Construction Phase impact will be Direct, Negative, Moderate, Temporary. Removal of vegetation, supervised by an accredited structural engineer specialising in historic structures has already taken place and a structural appraisal prepared by CORA engineers is appended in Volume 4 of this EIAR (Appendix A16.4). Their recommendations for consolidation and repair of the arch are contained in Section 3.1 of the CORA report and will be implemented by the appointed contractor. In addition, mitigation will include protection and monitoring prior to, and for the duration of the Construction Phase to prevent damage to the arch. Protective measures and monitoring are to be undertaken by an appropriate architectural conservation specialist engaged by the appointed contractor in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR.

It is considered that a Schedule of Works and Method Statement for the proposed repair works to the Gothic Arch, Protected Structure RPS Ref. 244 should be submitted for formal agreement and approval with SDCC Architectural Conservation Officer prior to the commencement of works. Works should be carried out by suitably qualified conservation contractor with experience in the conservation and repair of historic structures.

The Proposed Scheme has an overall length of approximately 10km from end to end online with additional offline upgrades and quiet street treatment of approx. 2km and 1.5km respectively. The Proposed Scheme will be comprised of two main alignments, namely from



Templeogue to Terenure (3.7km), and from Rathfarnham to the City Centre (6.3km). The Templeogue to Terenure section will commence on the R137 Tallaght Road, east of the M50 junction 11 interchange. From here, the Proposed Scheme is routed via the R137 along Tallaght Road and Templeogue Road, through Templeogue Village, to Terenure Cross, where it joins the Rathfarnham to City Centre section. The Rathfarnham to City Centre section will commence on the R821 Grange Road at the junction with Nutgrove Avenue, and is routed along the R821 Grange Road, the R115 Rathfarnham Road, the R114 Rathfarnham Road where it then enters at Terenure and towards the City Centre which comes under DCCs administrative area.

No physical interventions are proposed within Templeogue Village. Signal-controlled priority will be provided both east and west of Templeogue Village to manage bus priority through the village. BusConnects scheme proposals are intended to tie into the South Dublin County Council Part VIII Templeogue Village Initiative at Templeogue Tennis Club and at Hollingsworth Cycles; It is proposed to amend the layout of the Templeogue Road / Cypress Grove Road junction in order to improve alignment for inbound buses and reduce the impact on trees and minimise land acquisition from adjacent properties; Quiet street treatment to Rathdown Crescent and Rathdown Park is proposed to provide for inbound cyclists on the Templeogue to Terenure section to join the Rathfarnham to City Centre section; Removal of land-take at inbound bus gate on Templeogue Road at Olney Grove and at properties just north of the Springfield Avenue junction; includes for segregated cycle tracks on Rathfarnham Road, with the exception of a 270m long section of inbound cycle track, with bus priority provided through a combination of signal-controlled priority and partial bus lanes; Signal-controlled priority proposed between Rathdown Park and Bushy Park Road, reducing land

Section 2 of the Proposed Scheme will commence at the junction of Grange Road and Nutgrove Avenue, where it will tie into the Grange Road Cycle scheme. It is proposed to upgrade this junction through the provision of kerb protection for cyclists. This will require a limited amount of land take from the entrance to the Rathfarnham Wood development. It is also proposed to reconfigure the existing car park adjacent to this junction to facilitate the revised road arrangement and to install a new island bus stop layout in this location. Between this junction and the Castleside Drive junction it is proposed to provide a single bus lane alongside general traffic lanes and cycle tracks in both directions. To accommodate the road layout, it is proposed to utilise limited land-take from adjacent properties, including setting back the existing boundary wall to Rathfarnham Castle Park.

The Rathfarnham to City Centre Section commences on the R821 Grange Road at the junction with Nutgrove Avenue. The remains of the Demesne of Rathfarnham Castle are located on the east side of the carriageway. Though the demesne has been much reduced in size, it has been retained as a public park surrounding Rathfarnham Castle, a Protected Structure & National Monument in State ownership, (SDCC RPS 221). It is situated within Rathfarnham Castle Park, separated from the wide modern roadway by a boundary of railings / rendered wall and mature trees. The structure is visible from the roadside through the railings that line this part of the boundary. The castle was built in the late 16th century and underwent significant remodelling in the 18th century, with an extension and refurbishment during the 20th century.

The existing boundary wall of Rathfarnham castle will be set back and reconstructed with a round capping roughcast render. It is proposed to upgrade the junction of Rathfarnham Road and Willbrook Road through the provision of kerb protection for cyclists. It is also proposed to upgrade the junction of Rathfarnham Road and Butterfield Avenue through the provision of kerb protection for cyclists. This will require the removal of general traffic lanes on the Butterfield Avenue arm of this junction.

Details of the Landscape and Urban realm proposals is provided with an overview of the landscape design principles and approach under Section 4.6.13. This section provides a description of specific landscape and urban realm design works in Section 2 of the Proposed Scheme. The Grange Road junction is to be rationalised to reduce the overarching vehicular dominance and to provide additional landscape areas that will enhance pedestrian amenity and public realm.

Grange Road will be widened further, requiring encroachment into the grounds of Rathfarnham Castle, however the realigned boundary will facilitate planting street trees in the new footpath to soften and enhance the appearance of the existing roadway and to provide a sense of separation between the pedestrian space and roadway. Proposals that will directly impact on Rathfarnham Castle, Protected Structure (RPS Ref. 221) include the replacement of the existing boundary wall along Rathfarnham Road with a new boundary wall finished in roughcast render, which was presented as the preferred option as it was felt that it would be more in keeping with the construction of the castle. The impacted woodland will be replanted with native species and the existing playground will be integrated with the new planting and setback wall alignment.

The proposal at this location is also located opposite the Rathfarnham/Willbrook ACA. The affected boundary walls to Grange Road and Rathfarnham Road are replacement boundaries built as part of previous road schemes. The boundary treatment to Rathfarnham Road consisting of concrete block walling. The boundary treatment to Grange Road consists of coursed granite rubble, with railings and brick dressings near the pedestrian entrance to the park. The entrance gate itself is of dressed stone blocks with a segmental arched lintel. A number of trees will be removed and there will be a negative visual impact during construction. The magnitude of Impact on the demesne is Medium. The EIAR states that “the potential Construction Phase impact is Direct, Negative, Significant and Temporary”.

During 2022 SDCC Architectural Conservation Officer was presented with options with regard to the proposed boundary treatment at Rathfarnham Castle. A number of assessments were made on the proposals presented and formal comments and recommendations were provided at that time. A response provided during April 2022 stated that “*the wall although not original provides a partial stone boundary wall that is in keeping with other boundary features within the Rathfarnham Area (Rathfarnham Village/Willbrook Road ACA) and that on considering Option 1 provided by ARUP that it is agreed the boundary treatment that is simple in form and any new wall should not be a pastiche replica of an original type wall but should be easily identifiable as a new boundary feature at this location as an cohesive treatment adding to the streetscape*”.

*The visual survey of the wider area in assessing the original demesne of Rathfarnham Castle allows scope for reinstating a boundary type with a new wall that would complement the visual setting of the Castle. I would agree with the use of lime render on the park/castle side in order to improve the visual aspect/views from the Castle. The visual survey provides justification for the proposed new preferred option, however I do feel that a counter argument could be made for either providing a stone faced boundary wall which would be more in keeping with the surrounding boundary treatments in the area and at St. Enda's Park or providing a roughcast rendered wall with panel detail reflecting the original type boundary treatment and one that can be found at other sites in the area i.e. Loreto Abbey and Beaufort House. I feel it is important to ensure that whatever boundary treatment is reinstated at this location, that it allows cohesion along the streetscape which will add to the architectural aesthetic of the area and adjoining ACA.*

*I would therefore ask that a visual impact assessment is provided with regard to the preferred option and how the proposed boundary wall will sit at this location being far removed from the original bell mouth wall at Rathfarnham Castle Gate Lodge. This should be submitted with final details of the materials when a formal application is being made. I do feel that a stone boundary wall would be less visually obtrusive, but consideration will be given to the preferred option in terms of a more decorative wall to improve the views from Rathfarnham Castle. In providing a more cohesive boundary type as part of reinstating the demesne wall, it allows a more formal setting to the site of Rathfarnham Castle and adding architectural interest along the streetscape. This, however, can only be achieved and deemed acceptable if it is felt that the boundary wall proposed (roughcast render on external face will be fielded and panelled) will not result in a new boundary treatment that could overbearing and visually jarring at this location”.*

In response to the comments issued at this time an architectural visual assessment statement was provided along with comments from the design team, conservation architect and landscape architect. As part of the design rationale, it was considered that the new boundary wall should reflect the original sections of castle wall along Rathfarnham Road, which is also found at Beaufort House, Grange Road. The design rationale is based on reinstatement of the historic formal boundary treatment style at this location in providing a feature that is more in keeping with the perimeter of the Castle Demesne.

The undersigned agrees that the existing mix of boundary treatments on the Grange Road and Rathfarnham Road provides a poor and discordant street frontage and detracts from the streetscape, particularly in relation to the adjoining ACA and Protected Structures. The concrete block walling also detracts significantly from the Castle and its setting. Consultations have been undertaken with SDCC, OPW, Dept. of Housing, Local Government and Heritage regarding the need for encroachment into the Rathfarnham Castle Demesne and the removal, set back and the most appropriate wall type and finish to form the realigned and replaced boundary wall. The Castle and Park are surviving fragments of a demesne landscape so accordingly the approach taken was to identify and inspect surviving sections of the old demesne wall in the locality as the form and structure of these surviving portions would inform the appearance of the proposed new wall. The other demesne treatments in the locality such as Marley Park were also investigated for comparison on the recommendation of the Councils Architectural Conservation Officer and DCHG. Visual surveys of surviving



features of Rathfarnham Castle Demesne wall in the surrounding locality were undertaken by the BusConnects Infrastructure team. Historic maps including the 1843 Ordnance Survey map indicate that the old demesne also formerly encompassed what is now the Castle Golf Club, located to the east of the Proposed Scheme. The Golf Club retains a buffer of trees and a granite rubble boundary wall along Nutgrove Avenue.

When compared with the demesne boundary wall and associated trees and landscaping, shown on the 1843 Ordnance Survey map, the present boundary wall on Nutgrove Avenue is consistent with the historic demesne wall. The only surviving portion of the old demesne wall that was noted along the Proposed Scheme was the bell mouth to the entrance gates to Castle Lodge (RPS Ref. 212), located at the junction of Castleside Drive and a short stretch of wall to the north. This lodge and the associated bell mouth and gate piers are the surviving portions of the 19th-century entrance gates to the Castle. The stone capped piers and bell mouth and a stretch of wall to the north of the bell mouth are rendered with a dash/harling. The line of the wall and the stone rubble construction, visible on the rear face, and height suggest it is part of the old demesne wall as the line follows the line of the demesne wall evident on the 1843 Ordnance Survey Map.

It has a rounded cap although this is concrete and a later intervention for weathering. Closer inspection also revealed that the dash render here is a relatively modern replacement and not original. Most of the demesne walls at Marley Park, Marley Grange and St Enda's are of exposed stone rubble construction. The exception is at the entrance gates to Marley Grange. The bell mouth has dashed render panels with smooth renders pilasters and plinths. Similar treatment with larger panels or more widely spaced pilasters was noted on the boundary walls to the former demesnes of Beaufort (now the Loreto High School) and Rathfarnham House (now the Loreto Abbey) on Grange Road. This type of treatment has also been noted elsewhere in Dublin including the boundary treatment to Ravenswell House (now St Philomena's Primary School) in Little Bray Wicklow and at Willow Park School in Blackrock. Willow Park has a rendered, fielded, and panelled treatment and has similar sensitivities to Rathfarnham in that it is a protected structure within a demesne landscape and is located near the Rathfanham/Willbrook Rd ACA.

Having regard to the considerations which came out of the consultation process, the BusConnects team have prepared the following approach for the treatment of the boundary wall replacement.

- The proposed wall will be 2.8m in height with a rounded capping detail. This is consistent with the existing wall and together with the proposed landscape treatment will provide the necessary buffer between the proposed scheme and the Castle and its Demesne and maintains and enhances the sense of enclosure. Externally, the wall will be faced in fielded and panelled roughcast render (which will avoid visible expansion joints in the wall), while internally, the wall will be faced in lime render. The form and finish of the wall in this option was informed by the survey undertaken in the locality:
- The proposed wall will have a rounded capping similar to that evident on the surviving section of the Demesne wall at Castle Lodge.

- The roughcast renders on the external face will be fielded and panelled in a manner similar to the boundary treatment at Rathfarnham House (now the Loreto Abbey) on Grange Road. The panelling is not only in keeping with the demesne landscape, but with the surrounding streetscape and with similar boundary treatments in the locality.

The existing retained 20th-century walls will be rendered to match the proposed wall. At the pedestrian entrance, the existing stone arch is to be reinstated along with the existing cobbled paving with a new 0.8m wall with roughcast render and railings to the north and south of the pedestrian entrance. The existing railings at the main visitors' entrance to the castle will be retained.

It is also considered that the proposals detailed above are acceptable and that the new boundary wall required at this location will provide a boundary treatment that improves views from the Castle and allows the boundary treatment of the Castle Demesne to be more consistent and improve the overall visual impact and architectural detail.

Rathfarnham Village lies to the west of the Proposed Scheme and much of it is within the Rathfarnham Village/Willbrook Architectural Conservation Area. Structures of interest which are located within it, and which adjoin the Proposed Scheme include the Church of the Annunciation (RPS Ref. 266), the Yellow House (RPS Ref. 231), St Bridget's House, Willbrook Rd (RPS Ref. 233) and Rathfarnham Village Church and Graveyard (RPS Ref. 213) in Rathfarnham Village. Castle Lodge RPS Ref. 212 Rathfarnham Road is just outside the centre of the village. At the Dodder the Proposed Scheme crosses Pearse Bridge (RPS Ref. 193).

Full details of the Protected Structures and sites/buildings/features of architectural interest are included in detail as part of the Environmental Impact Assessment Main Report (Section 16.3). The report has identified items not included on the RPS and other items of interest.

With regard to the proposed scheme, indirect physical Construction Phase impacts are anticipated in three locations, where protected structures of National Importance and High Sensitivity share a boundary with the Proposed Scheme. Protected Structures as detailed in the EIAR located within the administrative area of SDCC will not be directly impacted by the Proposed Scheme, but there is potential for damage during construction. The magnitude of impact is considered medium.

The potential Construction Phase impact will be Indirect, Negative, Significant and Temporary. It is therefore considered that a Safety Statement should be completed detailing how shared boundary features which form part of a Protected Structure site will be safeguarded during the proposed scheme. The safety statement should be submitted for the agreement and approval of the Council Architectural Conservation Officer.

Indirect physical Construction Phase impacts are anticipated in those locations, where protected structures of Regional Importance and Medium Sensitivity share a boundary with the Proposed Scheme. They are outlined in Table 16.7 and described in Appendix A16.2 Inventory of Architectural Heritage Sites in Volume 4 of this EIAR. The structures are of Medium

Sensitivity. None of these features will be directly impacted by the Proposed Scheme, but there is potential for damage during construction. The magnitude of impact is Medium. The potential Construction Phase impact will be Indirect, Negative, Moderate and Temporary. Section 16.5 Mitigation and Monitoring Measures have been detailed.

Construction Phase Proposed mitigation measures for architectural heritage features are outlined in this Section and detailed in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric. The methodology has been prepared in accordance with the Department of Arts, Heritage, and the Gaeltacht (DAHG) Architectural Heritage Protection: Guidelines for Planning Authorities (DAHG 2011) and Paving.

A summary of Construction Phase impacts following the implementation of mitigation measures is provided. Mitigation measures are detailed in Vol 4 Appendices a methodology is provided. The details have been assessed and are considered appropriate in the overall approach. It is considered that when works are due to commence Bus Connects project team should contact the Local Authority Architectural Conservation Officer in order to discuss specifications for works/repairs etc where required.

### **Conclusion and Recommendation**

The EIAR completed for the Bus Connects Scheme Route (Templeogue/Rathfarnham to City Centre) includes a very detailed and comprehensive overview of Protected Structures and Architectural Conservation Areas and Architectural features/items located within the vicinity of the proposed route. A Methodology has been developed and is included in the Appendices of the EIAR The Methodology should be adhered to in accordance with best conservation practice and good design.

The following Conditions are also recommended:

1. As part of the design concept ARUP commissioned a condition assessment of the Gothic Arch by a conservation engineer in order to assess the structure and determine the repair works required as part of the overall scheme, vegetation was also removed at that time by a conservation contractor. The proposed works to include the conservation and repair of the Gothic Arch are welcomed along with the overall public realm design works ensuring the Arch is integrated into the design allowing it to be fully appreciated within the current landscape.

In accordance with Volume 4 of this EIAR (Appendix A16.4). The recommendations for consolidation and repair of the arch are contained in Section 3.1 of the CORA report and will be implemented by an appointed contractor. In addition, mitigation will include protection and monitoring prior to, and for the duration of the Construction Phase to prevent damage to the arch. Protective measures and monitoring are to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR.



Based on the above and the Condition Assessment report for the consolidation and repair of the Arch works should be carried out in accordance with the details of the report and recommendations. It is therefore considered that a Schedule of Works and Method Statement for the proposed repair works to the Gothic Arch, Protected Structure RPS Ref. 244, should be submitted for formal agreement and approval with SDCC Architectural Conservation Officer prior to the commencement of works. Agreed works should be carried out by suitably qualified conservation contractor with experience in the conservation and repair of historic structures.

2. Having regard to the considerations which came out of the consultation process, the BusConnects team have prepared the following approach for the treatment of the boundary wall replacement.
  - The proposed wall will be 2.8m in height with a rounded capping detail. This is consistent with the existing wall and together with the proposed landscape treatment will provide the necessary buffer between the proposed scheme and the Castle and its Demesne and maintains and enhances the sense of enclosure. Externally, the wall will be faced in fielded and panelled roughcast render (which will avoid visible expansion joints in the wall), while internally, the wall will be faced in lime render. The form and finish of the wall in this option was informed by the survey undertaken in the locality:
  - The proposed wall will have a rounded capping similar to that evident on the surviving section of the Demesne wall at Castle Lodge.
  - The roughcast renders on the external face will be fielded and panelled in a manner similar to the boundary treatment at Rathfarnham House (now the Loreto Abbey) on Grange Road. The panelling is not only in keeping with the demesne landscape, but with the surrounding streetscape and with similar boundary treatments in the locality. The existing retained 20th-century walls will be rendered to match the proposed wall. At the pedestrian entrance, the existing stone arch is to be reinstated along with the existing cobbled paving with a new 0.8m wall with roughcast render and railings to the north and south of the pedestrian entrance. The existing railings at the main visitors' entrance to the castle will be retained.

It is also considered that the proposals detailed above are acceptable and that the new boundary wall required at this location will provide a boundary treatment that improves views from the Castle and allows the boundary treatment of the Castle Demesne to be more consistent and improve the overall visual impact and architectural detail.

3. The methodology gives due consideration to architectural conservation principles in providing an overall approach. One of the main areas that has not been fully detailed in where an existing boundary of a Protected Structure site is shared with the proposed scheme. Potential Impact has been identified with regard to possible damage during construction phase, it is therefore considered that details are required by way of a safety statement and associated method statement in addressing this particular concern.

4. It is considered that when works are due to commence, the Bus Connects Project Team should contact the Local Authority Architectural Conservation Officer in order to discuss specifications for works/repairs and finishes etc where required.

## Conclusion

SDCC welcomes the proposed Templeogue/Rathfarnham to City Centre Core Bus Corridor route which will provide high quality public transport infrastructure. However, as set out in this submission, we would take the opportunity to comment on a number of **general issues** which can be summarised as follows:

1. Avoiding an over-engineered approach which can create a hostile environment for active travel, can have negative visual impacts and can make the creation of a human-scaled streetscape difficult;
2. Adequate provision for walking and cycling on attractive and safe routes including adherence to the principles of universal design;
3. Ensuring there is adequate greening including –
  - (a) Avoid removal of trees (acknowledge some are low quality – category U) and green areas
  - (b) Where unavoidable or trees are low quality, replacement planting and greening to result in an overall net gain. Supplementary street-tree planning is warranted along route
  - (c) Supplementary nature-based SUDS features are warranted along route;
4. Tying in with other proposed infrastructure including underground utilities and SDCC's Active Travel and Cycle South Dublin proposals.
5. Consideration to be given to operation of construction compounds on SDCC lands by agreement rather than by temporary CPO. SDCC is best placed to manage issues around these compounds because of its local knowledge and existing relationship with local communities. **An Bord Pleanála is advised SDCC hereby offers its consent for the temporary use of its lands as construction compounds as identified and delineated to the submitted drawings by the NTA or its agents for these delivery of these proposals by agreement.**

With respect to the **specific proposals**, we would summarise our concerns as follows:

1. **Construction Compound TR3**, located along Dodder View Road, in the open space area between Dodder View Road, Woodview Cottages and Church Lane. The proposed compound at this location is close to the site of an existing term-limited, temporary construction compound where SDCC have agreements regarding full reinstatement of the compound area to planted, landscaped parkland. The proposed construction compound (Ref:TR3) is considered excessive and occupies the majority of the usable parkland at this location. SDCC do not recommend ceding of this important location

with a temporary CPO. SDCC recommend that the extent of the proposed compound should be limited to the existing compound location on site, and the extent, mitigation and reinstatement measures are to be agreed with SDCC by local agreement rather than CPO.

2. SDCC see that detailed Construction Management Plans (CMP) are necessary to ensure the efficient and safe delivery of this project. The level of detail required for such CMP's is detailed in this submission.
3. SDCC encourage further discussion between NTA and SDCC on the exact parcels of public land identified within the scheme. SDCC need complete clarity on what land will become public realm after the scheme is completed and the maintenance implications of such lands.
4. Schedule of Works and Method Statement for the proposed repair works to the Gothic Arch, Protected Structure RPS Ref. 244, should be submitted for formal agreement and approval with SDCC Architectural Conservation Officer prior to the commencement of works.
5. It is considered that when works are due to commence, the Bus Connects Project Team should contact SDCC Architectural Conservation Officer in order to discuss specifications for works/repairs and finishes etc where required.
6. Safety and method statements sought by compliance in relation to areas referenced by the Architectural Conservation Officer.
7. More green infrastructure, tree planting and hedge retention should be secured along the full length of the route in particular to avoid streets where no trees are planted and to ensure mitigation where trees and hedgerows are to be removed.
8. At present SDCC do not have enough information to adequately quantify the numbers of trees that will be lost in Rathfarnham Castle Park woodland, the impact of the tree loss on the woodland, biodiversity, visual amenity and landscape is therefore not calculable and the mitigation that would be required to decrease any impact is not possible to quantify or assess. We are strongly of the opinion that further assessment is required with regard to the proposals along and within the boundary of Rathfarnham Castle Park. SDCC would strongly recommend sufficient replacement woodland habitat be established by agreement with SDCC Public Realm Section, as close as possible to Rathfarnham and in South Dublin County Council area.
9. More natural based SuDs should be secured along the full length of the route.
10. Any structures proposed should have a setback distance to the outside diameter of surface water sewers as per attached table. The setback distance for foul and watermain should be as per Irish Water Standards.



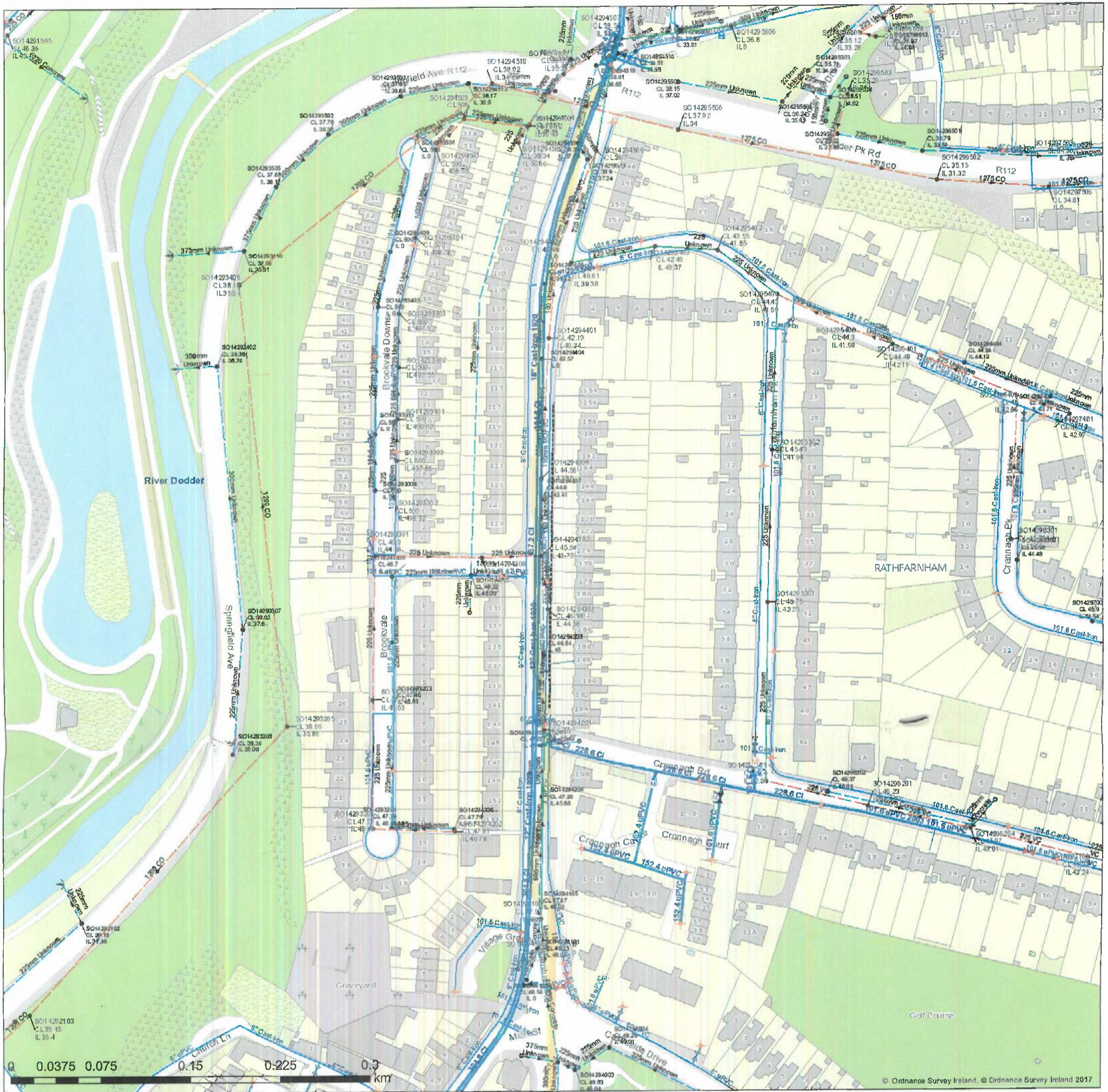
11. It is strongly recommended to review Sections 4.2.2 and 11.3.1 for relevant policy and objectives relating to riparian corridors. Development within or affecting riparian corridors are required to meet the criteria specified in Section 12.4.3 County Development Plan.
12. It will be important to ensure that all necessary environmental and ecological surveys have been completed to ensure a full assessment of the planning application to be completed.







# Irish Water Web Map



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<b>Water Distribution Networks</b> Water Treatment Plant Water Pump Station Storage Cell/Tower Dosing Point Meter Station Abstraction Point Telemetry Kiosk <b>Reservoir</b> Potable Raw Water <b>Water Distribution Mains</b> Irish Water Private <b>Trunk Water Mains</b> Irish Water Private <b>Water Lateral Lines</b> Irish Water Non IW Water Casings Water Abandoned Lines Boundary Meter Bulk/Check Meter Group Scheme Source Meter Waste Meter Unknown Meter; Other Meter Non-Return PRV PSV Sluice Line Valve Open/Closed Butterfly Line Valve Open/Closed Sluice Boundary Valve Open/Closed Butterfly Boundary Valve Open/Closed Scour Valves	Single Air Control Valve Double Air Control Valve Water Stop Valves Water Service Connections Water Distribution Chambers Water Network Junctions Pressure Monitoring Point Fire Hydrant/Washout <b>Water Fittings</b> Cap Reducer Tap Other Fittings <b>Sewer Foul Combined Network</b> Waste Water Treatment Plant Waste Water Pump Station <b>Sewer Mains Irish Water</b> Gravity - Combined Gravity - Foul Gravity - Unknown Pumping - Combined Pumping - Foul Pumping - Unknown Syphon - Combined Syphon - Foul Overflow <b>Sewer Mains Private</b> Gravity - Combined Gravity - Foul Gravity - Unknown Pumping - Combined Pumping - Foul Pumping - Unknown Syphon - Combined Syphon - Foul Overflow <b>Sewer Lateral Lines</b> Sewer Lateral Lines Sewer Casings <b>Sewer Manholes</b> Standard Backdrop Cascade Catchpit Bifurcation Haunchbox Lamphole Hydrobrake Other; Unknown	<b>Discharge Type</b> Outfall Overflow Soakaway Standard Outlet Other; Unknown <b>Cleanout Type</b> Rodding Eye Flushing Structure Other; Unknown <b>Sewer Inlets</b> Catchpit Gully Standard Other; Unknown <b>Sewer Fittings</b> Vent/Col Other; Unknown <b>Storm Water Networks</b> Surface Water Mains Surface Gravity Mains Surface Gravity Mains Private Surface Water Pressurised Mains Surface Water Pressurised Mains Private <b>Inlet Type</b> Gully Standard Other; Unknown <b>Storm Manholes</b> Standard Backdrop Cascade Catchpit Bifurcation Haunchbox Lamphole Hydrobrake Other; Unknown Storm Culverts Storm Clean Outs Stormwater Chambers <b>Discharge Type</b> Outfall Overflow Soakaway Other; Unknown	<b>Gas Networks Ireland</b> Transmission High Pressure Gasline Distribution Medium Pressure Gasline Distribution Low Pressure Gasline <b>ESB Networks</b> <b>ESB HV Lines</b> HV Underground HV Overhead HV Abandoned <b>ESB MV/LV Lines</b> MV Overhead Three Phase MV Overhead Single Phase LV Overhead Three Phase LV Overhead Single Phase MV/LV Underground Abandoned <b>Non Service Categories</b> Proposed Under Construction Out of Service Decommissioned <b>Water Non Service Assets</b> Water Point Feature Water Structure <b>Waste Non Service Assets</b> Waste Point Feature Sewer Waste Structure
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# Irish Water Web Map



<b>Water Distribution Network</b> Water Treatment Plant Water Pump Station Storage Cell/Tower Dosing Point Meter Station Abstraction Point Telemetry Kiosk <b>Reservoir</b> Potable Raw Water <b>Water Distribution Mains</b> Irish Water Private <b>Trunk Water Mains</b> Irish Water Private <b>Water Lateral Lines</b> Irish Water Non IW <b>Water Casings</b> Water Abandoned Lines Boundary Meter Bulk/Check Meter Group Scheme Source Meter Waste Meter Unknown Meter, Other Meter Non-Return PRV PSV Sluice Line Valve Open/Closed Butterfly Line Valve Open/Closed Sluice Boundary Valve Open/Closed Butterfly Boundary Valve Open/Closed Scour Valves	Single Air Control Valve Double Air Control Valve Water Stop Valves Water Service Connections Water Distribution Chambers Water Network Junctions Pressure Monitoring Point Fire Hydrant/Washout <b>Water Fittings</b> Cap Reducer Tap Other Fittings <b>Sewer Point Combined Network</b> Waste Water Treatment Plant Waste Water Pump station <b>Sewer Mains Irish Water</b> Gravity - Combined Gravity - Foul Gravity - Unknown Pumping - Combined Pumping - Foul Pumping - Unknown Syphon - Combined Syphon - Foul Syphon - Unknown <b>Sewer Mains Private</b> Gravity - Combined Gravity - Foul Gravity - Unknown Pumping - Combined Pumping - Foul Pumping - Unknown Syphon - Combined Syphon - Foul Syphon - Unknown <b>Sewer Lateral Lines</b> Sewer Lateral Lines Sewer Casings <b>Sewer Manholes</b> Standard Backdrop Cascade Catchpit Catchpit Bifurcation Hatchbox Lamphole Hydrobrake Other, Unknown	<b>Discharge Type</b> Outfall Overflow Skewaway Standard Outlet Other, Unknown <b>Cleanout Type</b> Rodding Eye Flushing Structure Other, Unknown <b>Sewer Inlets</b> Catchpit Gully Standard Other, Unknown <b>Sewer Fittings</b> Vent/Col Other, Unknown	<b>Storm Water Network</b> Surface Water Mains Surface Gravity Mains Private Surface Water Pressurised Mains Surface Water Pressurised Mains Private <b>Inlet Type</b> Gully Standard Other, Unknown <b>Storm Manholes</b> Standard Backdrop Cascade Catchpit Bifurcation Hatchbox Lamphole Hydrobrake Other, Unknown Storm Culverts Storm Clean Outs Stormwater Chambers <b>Discharge Type</b> Outfall Overflow Skewaway Other, Unknown	<b>Gas Networks Ireland</b> Transmission High Pressure Gasline Distribution Medium Pressure Gasline Distribution Low Pressure Gasline <b>ESB Networks</b> HV Lines HV Underground HV Overhead HV Abandoned <b>ESB MVLV Lines</b> MV Overhead Three Phase MV Overhead Single Phase LV Overhead Three Phase LV Overhead Single Phase MVLV Underground Abandoned <b>Non Service Categories</b> Proposed Under Construction Out of Service Decommissioned <b>Water Non Service Assets</b> Water Point Feature Water Pipe Water Structure <b>Waste Non Service Assets</b> Waste Point Feature Sewer Waste Structure
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