



Fingal County Council
County Hall
Main Street
Swords
Co. Dublin
K67 X8Y2

Date: 12 September 2023

Re: BusConnects Swords to City Centre Bus Corridor Scheme
Swords to Dublin City Centre

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter.

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

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

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

Yours faithfully,

Sarah Caulfield
Executive Officer
Direct Line: 01-8737287

HA03A

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11th September 2023

The Secretary,
An Bord Pleanála (Strategic Infrastructure Division)
64 Marlborough Street,
Dublin 1,
D01 V902

By email sids@pleanala.ie

**Re: ABP Case Ref- HA06D.317121 Swords to Dublin City Centre Core Bus Corridor Scheme
Observations**

Dear Secretary,

We refer to the application being made by or on behalf of the National Transport Authority (NTA) pursuant to section 51(2) of the Roads Act 1993 (as amended) (the "Act") in relation to the proposed road development consisting of the construction of the Swords to City Centre Core Bus Corridor Scheme (the "Application").

Introduction

Fingal County Council strongly supports the Core Bus Corridors (CBC) element of the Bus Connects programme and welcomes the opportunity to engage with the statutory planning process in order to ensure that the Swords - City Centre Core Bus Corridor is designed and implemented to take full account of the existing and future needs of the citizens, businesses and communities of Fingal and ensure that the final layout is the optimal design alignment for Bus Connects within Fingal.

Fingal County Council's overall objective is to see the provision of a sustainable, high quality and efficient transport corridor that will underpin the future sustainable development of the Swords Road corridor and the wider area including a strong connection with Dublin Airport. The coordination of the proposed CBC proposals with the various other transport proposals being considered by Fingal County Council and the NTA in this area will be a critical aspect in ensuring that the overall capacity of the corridor is maintained both during construction and in the longer-term operational stage.

Policy Context

National Level Policy Context

The *Climate Action Plan 2023* (CAP23) acknowledges the key role that land use and spatial planning can play in ensuring that population growth is managed in a sustainable way, thus reducing our carbon footprint. The CAP identifies a set of actions to address the impacts of climate change on Ireland's environment, society, economy and natural resources. A key action relating to major public transport infrastructure provision includes advancing the BusConnects programme. The delivery of BusConnects will provide sustainable transport infrastructure in support of key actions set out in the CAP 2023.

Project Ireland 2040-National Planning Framework (NPF) identifies the need for reliable, affordable, sustainable, and integrated public transport in Dublin and in this regard, promotes the delivery of key infrastructure projects as set out in the *Transport Strategy for the Greater Dublin Area*. A cornerstone project of the strategy includes BusConnects. The following NSO is explicit in its support for the proposed project:

- NSO4: Expand attractive public transport alternatives to car transport to reduce congestion and emissions and enable the transport sector to cater for the demands associated with longer-term population and employment growth in a sustainable manner through the following measures: Deliver the key public transport objectives of the transport strategy for the Greater Dublin Area 2016-2035 by investing in projects such as New MetroLink, DART Expansion Programme, BusConnects in Dublin and key bus-based projects in the other cities and towns.

The *National Development Plan 2021-2030* sets out the investment priorities that will underpin the successful implementation of the NPF. BusConnects is specifically identified as one of the five 'Strategic Investment Priorities' that aligns with NSO4 (Sustainable Mobility) of the NPF, providing a sustainable, safe, efficient, integrated and accessible public transport service between Swords and Dublin City Centre, forming a key element of the overall integrated public transport system for Dublin, alongside MetroLink and DART +.

The *National Sustainable Mobility Policy* sets out a strategic framework for active travel and public transport journeys to 2030, to help Ireland meet its climate obligations. It is accompanied by an action plan which contains actions to improve and expand sustainable mobility options across the country by providing safe, green, accessible and efficient alternatives to car journeys. It also includes demand management and behavioural change measures to manage daily travel demand more efficiently and to reduce the journeys taken by private car. The policy includes three key principles including, Safe and Green Mobility, People Focused Mobility and Better Integrated Mobility. The policy document supports safe and green mobility through the delivery of the BusConnects programme.

The *National Investment Framework for Transport in Ireland (NIFTI)*, the strategic framework for future investment decision making in land transport to guide transport investment in the years ahead to enable the National Planning Framework, supports the Climate Action Plan and promotes positive social, environmental and economic outcomes throughout Ireland. NIFTI sets out the modal hierarchy in Ireland as; 1. Active Travel; 2. Public Transport; 3. Private Vehicles. It also outlines an intervention hierarchy which is: 1. Maintain; 2. Optimise; 3. Improve; 4. New. In this regard, NIFTI supports sustainable mobility and encourages active travel and public transport and supports projects that will reduce urban congestion, particularly those that include new sustainable mobility infrastructure and optimises the existing infrastructure to prioritise sustainable transport modes.

Regional Level Policy Context

The *Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-2031* [RSES] promotes the growth of Dublin and regional centres in a sustainable manner, aligning services with population and economic growth, optimisation of infrastructure including public transport and the promotion of compact urban settlement patterns. RSES promotes the BusConnects programme which will provide a strategic link between Swords, Dublin Airport and Dublin City Centre which represents a significant opportunity for enhanced connectivity along the corridor.

The following RPOs of relevance to the project include:

- RPO 5.2: Support the delivery of key sustainable transport projects including MetroLink, DART and LUAS expansion programmes, BusConnects and the Greater Dublin Metropolitan Cycle Network and ensure that future development maximises the efficiency and protects the strategic capacity of the metropolitan area transport network, existing and planned.
- RPO 5.3: Future development in the Dublin Metropolitan Area shall be 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 attractive street environment for pedestrians and cyclists.
- RPO 5.6: The development of future employment lands in the Dublin Metropolitan Area shall follow a sequential approach, with a focus on the re-intensification of employment lands within the M50 and at selected strategic development areas and provision of appropriate employment densities in tandem with the provision of high-quality public transport corridors.
- RPO 8.9: The RSES supports delivery of the bus projects set out in Table 8.3 subject to the outcome of appropriate environmental assessment and the planning process. Projects relevant to Fingal outlined in Table 8.3 include the delivery of BusConnects Core Bus Corridors.
- RPO 8.18: Improved access to Dublin Airport is supported, including MetroLink and improved bus services as part of BusConnects, connections from the road network from the west and north. Improve cycle access to Dublin Airport and surrounding employment locations. Support appropriate levels of car parking and car hire parking.

The *Transport Strategy for the Greater Dublin Area 2022-2042* sets out various proposals for future transport investment for the next 20 years. Within the strategy, significant investment is planned for Fingal and particularly as it relates to the corridor connecting Fingal and Dublin City Centre which includes the delivery of the BusConnects network including Swords to the City Centre to enhance connectivity within the corridor. The delivery of the proposed BusConnects project is highlighted under Section 12.2 of the strategy and supported by Measures BUS1 and BUS3.

Fingal Development Plan 2023-2029

The *Fingal Development Plan 2023-29* through its strategic objectives seeks to transition to an environmentally sustainable carbon neutral economy, reduce car dependency and promote and facilitate sustainable modes of transport, prioritise walking, cycling and public transport. It seeks to do this while supporting an efficient and effective transport system and advancing well connected and well serviced communities with emphasis on transport linkages to Dublin City, Dublin Airport, including support for the BusConnects programme.

Chapter 6 of the FDP 2023 2029, Connectivity and Movement is explicit in the promotion of integrated land-use and transportation and acknowledges that public transport is crucial in supporting future sustainable and economic growth within Fingal, providing more efficient and reliable access to key urban centres within the region as well as connectivity to other major towns and cities.

The Plan also acknowledges that when combined with enhanced walking and cycling facilities and complimentary transport interchange, strategic public transport provision has the potential over the coming years to have a transformative impact on travel by shifting the dominance of car-based transport towards public transport.

The Plan promotes continued engagement with key transport providers including Transport Infrastructure Ireland and NTA to ensure the delivery of key public transport projects that will directly benefit Fingal and encourage a move away from dependency on the private car and towards a low carbon society.

The Plan also acknowledges the *South Fingal Transport Study 2019* and the part that its recommendations will play in facilitating sustainable growth within the Swords and south Fingal areas, particularly in the period before the delivery of MetroLink. The Plan supports the continued implementation of the recommendations of the Study in consultation with other stakeholders. This includes MetroLink, BusConnects, upgrades to the R132 and the delivery of the Swords Western Distributor Road.

Supportive policy and objectives as set out in the Plan as follows:

Policy CMP1 – Decarbonisation of Motorised Transport

Support the decarbonisation of motorised transport and facilitate modal shift to walking, cycling and public transport and taking account of National and Regional policy and guidance, while supporting an efficient and effective transport system.

Objective CMO1 – Transition to Sustainable Modes

Work with the NTA, TII and other transport agencies in facilitating the integrated set of transport objectives for the County as set out in this Plan, in line with National and Regional policy including the NTA's GDA Transport Strategy and any subsequent plan to encourage modal shift towards more sustainable modes of transport and patterns of commuting to reduce reliance on the private car.

Policy CMP3 – Integrated Land-Use and Transport Approach

Provide for an integrated approach to land-use and transportation aimed at minimising the demand for travel and prioritising sustainable modes of transport including walking, cycling and public transport.

Objective CMO3 – Integration of Public Transport and Development

Support and facilitate high-density, mixed-use development and trip intensive uses along public transport corridors and to ensure the integration of high-quality permeability links and public realm in conjunction with the delivery of public transport services through plan frameworks to generate and reinforce sustainable patterns of compact growth and development in the County.

Policy CMP18 – Public Transport

Support the provision of a high-quality public transportation system that is accessible to all to serve the needs of the County and to enable a significant shift from car-based travel to public transport.

Objective CMO23 – Enabling Public Transport Projects

Support the delivery of key sustainable transport projects including MetroLink, BusConnects, DART+ and LUAS expansion programme so as to provide an integrated public transport network with efficient interchange between transport modes to serve needs of the County and the mid-east region in collaboration with the NTA, TII and Irish Rail and other relevant stakeholders.

Objective CMO24 – NTA Strategy

Support NTA and other stakeholders in implementing the NTA Strategy including MetroLink, BusConnects, DART +, LUAS and the GDA Cycle Network.

Objective CMO29 – Integration of Public Transport Services and Development

Work with the NTA, TII and other relevant national transport agencies to optimise accessibility to public transport, increase catchment and maximise permeability through the creation of high-quality walking and cycling routes linking to public transport stops.

Objective CMO30 – Cycling and Walking Links

Avail of the opportunities provided by any public transport infrastructure works to improve and provide new cycling and walking links, including crossings of motorways and major roads which currently represent major permeability barriers to active travel especially in South Fingal.

Objective CMO31 – South Fingal Transport Study

Implement the recommendations of the South Fingal Transport Study 2019 in consultation with the relevant stakeholders.

Fingal Development Plan – Dublin Airport

The FDP 2023-2029 at Chapters 6 Connectivity and Movement and Chapter 8 Dublin Airport acknowledges the vital role that Dublin Airport plays in providing international connectivity and an important economic driver to Fingal, the mid-east region and nationally. The Dublin Airport LAP 2020 sets out a framework to facilitate the future development, operation and safeguarding of Dublin Airport. The land-use planning policy of the Dublin Airport LAP 2020, and the objective to increase the connectivity offered by Dublin Airport, is contingent on the continued protection of the core transport function of the Airport, enhanced land-side access to Dublin Airport, particularly through public transport provision such as MetroLink and BusConnects, implementation of the recommendations of the South Fingal Transport Study 2019 and careful land use management of land-side areas to focus on the current and future needs of the Airport as key infrastructure for National and Regional development.

Supportive policy and objectives as set out in the Plan as follows:

Policy CMP27 – Dublin Airport, Transportation, Surface Access and Freight

Support the continued protection of the core transport function of Dublin Airport including measures to enhance surface access, public transport connections and strategic freight movements.

Policy DAP2 – Infrastructure Provision

Ensure that the required infrastructure and facilities are provided at Dublin Airport, in accordance with Dublin Airport LAP 2020, or any subsequent LAP or extension of same, so that the Airport can develop further and operate to its maximum sustainable potential, whilst taking into account the impact on local communities, the environment and climate change.

BusConnects will provide a sustainable, high quality and efficient service between Swords, Dublin Airport and Dublin City Centre, serving existing and new communities within Fingal including developing employment and residential areas within Swords and the south Fingal areas. The proposed scheme will also support economic growth and competitiveness within Fingal including Dublin Airport and the wider region.

A number of land-use plan areas occur within the vicinity of the Swords to City Centre CBC, in order to support the sustainable development of strategic areas in the County identified in the Fingal Development Plan 2023-2029. These include the Barrysparks and Crowscastle Masterplan lands (MP 8.B, MP 8.D), Fosterstown Masterplan lands (MP 8.C), Dublin Airport Local Area Plan lands (LAP 11.A) and Dublin Airport Central Masterplan lands (MP 11.A).

The key aim of these various land-use plans is to establish parameters for urban design and to create permeability, connectivity, and appropriate densities, alongside delivery of community and amenity facilities, in order to leverage the potential of the existing and future transportation infrastructure in Swords, including BusConnects, MetroLink and the Greater Dublin Area Cycle Network. The provision

of improved bus services operating along the proposed Core Bus Corridor will be a significant element in the achievement of sustainable consolidated development in these areas.

In essence, BusConnects fulfils key strategic objectives of the FDP 2023-2029 for sustainable growth, connecting existing and new communities and employment areas along the route with the City Centre and the wider region as well as providing transport mobility and transport network integration for residents, commuters, and visitors. In addition, this strategic infrastructure will provide a fast and efficient sustainable transport alternative to the private car which is vital in promoting modal shift away from non-sustainable travel modes and enabling a reduction in our transport related carbon emissions in line with FDP policy and wider national policy.

Sheets 8 and Sheet 11 of the adopted Development Plan (as also shown on the interactive web viewer for the Fingal Development Plan 2023-2029 at <https://www.fingal.ie/development-plan>) specifically show the proposed CBC alignment as it passes through the relevant zoning objectives and land use plan areas within the County.

Local Level Policy Context – Other Relevant Documents

The *South Fingal Transport Study 2019* was prepared by Fingal County Council in accordance with the provisions of the Fingal Development Plan 2017-2023 and undertaken in collaboration with the relevant statutory transport agencies including Transport Infrastructure Ireland and the National Transport Authority, having regard to relevant national and regional policy. The Study makes key transport infrastructure recommendations relating to public transport, active travel and roads infrastructure provision, to ensure the sustainable growth of the South Fingal area including Swords and the Dublin Airport lands, leading up to the delivery of the proposed MetroLink. The Study informs the preparation of various land-use plans for the area including the Fingal Development Plan 2023-2029.

Sustainable Swords 2022 is a strategy informed by strategic documents including *Your Swords: An Emerging City, Strategic Vision 2035* that aims to increase the resilience of the local economy and to provide for an enhanced, accessible, inclusive and healthy urban environment. The strategy includes a Public Realm and Transport Strategy to facilitate more sustainable modes of transport to places of work and study as well as enabling recreation and tourism. The strategy sets out recommendations to maximise transformational public transport investment projects planned for Swords including BusConnects through enhanced permeability and connectivity to these key projects.

Your Swords: An Emerging City, Strategic Vision 2035 sets out the long-term strategic vision for Swords to create a sustainable city with a commensurate level of jobs, services and infrastructure. It is envisaged that Swords will be a major transport hub with an integrated public transport system, exploiting the opportunities of key public transport projects to advance Swords as a highly accessible and attractive location to live, work and do business.

Natural and Built Environment and the Fingal Development Plan 2023-2029

Landscape Designations

Landscape protection policies and objectives as set out specifically in Chapters 9 Green Infrastructure and Natural Heritage of the FDP 2023-2029 including policies GINHP3, GINHP5, GINHP7, GINHP9, GINHP11, GINHP25, GINHP26 and objectives GINHO2, GINHO18 and GINHO41. Sheets 8 and 11 and Green Infrastructure Maps 14, 15 and 16 of the FDP 2023-2029 shows the relevant zoning objectives and landscape designations in the context of the proposed scheme. www.fingal.ie/development-plan-2023-2029 refers. The proposed works to facilitate the scheme are to be carried out within the existing road corridor in an area that is predominantly urban in character.

Built Heritage

The protection, maintenance, and enhancement of the built heritage of Fingal is a key strategic objective of the FDP 2023-2029 and includes supportive policy and objectives relating to the protection and enhancement of protected structures, historic building stock, historic bridges, historic designed landscapes and character landscapes of high value and significance, as set out in Chapter 10 Heritage, Culture and Arts of the Plan. These include policies HCAP3, HCAP8, HCAP11, HCAP12, HCAP13, HCAP18 and HCAP21.

There are a number of archaeological monument and sites, that are protected by National Monument legislation and set out in the list of Recorded Monuments in Appendix 6 of the Plan which border the route corridor.

A careful balance is required between the need to preserve and enhance the built heritage features on or adjoining the proposed scheme and the provision of this strategic infrastructure. The project should be designed to minimise the impact on architectural and archaeological heritage assets, having regard to the relevant protection and enhancement provisions as set out in Chapter 10 Heritage, Culture and Arts of the FDP 2023-2029.

Fingal Conservation Office Comments:

NOTE: The statutory designation of Protected Structures are not depicted in the Fingal area in Figure 16.1 of Volume 3 Figures Chapter 16 Architectural Heritage. This should be addressed.

1. Bus Connects Bus Stop North of Airside Junction (heading northwards)

RPS No.	Protected Structure	Address	Proposed Impact
866	Milestone	Pinnock Hill, R132 (Swords Rd), Fosterstown North, Swords	Temporary removal and reposition of historic 18 th century milestone to facilitate new bus stop.

The proposed CBC project proposes the construction of a new bus stop on the northern side of the Airside Junction. The location of the bus stop requires the temporary removal and then re-positioning of the existing 18th century milestone. The position of the historic milestone is an integral part of its significance, and the distance marked was the old Irish mile which is no longer used but equated to circa 1.27 statute mile. John Rocque's Map of Dublin (1760) and Taylor & Skinners Map of the Roads of Ireland (1778) show this road with the locations of the turnpikes and milestones from Dublin denoted on it. The third edition of the Ordnance Survey Maps from the early 20th century (circa 1910) indicates that the current position matches its historic location. The alteration of its position fundamentally alters its significance as it severs the technical link between the measurement that its placement is marking.

Planning permission has been granted for a Strategic Housing Development (SHD) on lands to the west directly adjoining the proposed new bus stop (Planning Ref. SHD/018/21). An Bord Pleanála has attached a condition to the permission that relates to RPS No. 866. Under Condition No. 8 it states that *"The historic milestone RPS no.866 shall be adequately protected during the construction phase. Details of the measures to safeguard the milestone shall be submitted and agreed in writing with the Conservation Officer of Fingal County Council prior to any form of construction activity on site including*

ground preparation. Elevation drawings of the milestone and its relationship with the eastern site boundary shall also be submitted prior to the commencement of development." The approach of the BusConnects project regarding this protected structure should be consistent with that specified for the SHD.

The Architectural Conservation Officer asks that the position of the new bus stop is reconsidered and amended to avoid the re-positioning of the historic milestone. This should be the option taken rather than a high magnitude direct negative impact on the protected structure. The milestone should be adequately protected during the construction phase should the scheme proceed. Due to the low height of the milestone the protection will need to be sufficiently greater than the physical structure itself so that it is visible to construction vehicles. A buffer area should be erected around it to facilitate its protection. Details of the measures to safeguard the milestone need to be provided and agreed with the Conservation Office of the Planning Authority prior to any form of construction activity on site including ground preparation. The design of the area around the relocated bus stop should include details on how the setting of the milestone will be addressed, with exact details to be provided in plan and elevation drawings for agreement with the Planning Authority.

2. Temporary Restriction of Access to Stockhole Lane

RPS No.	Protected Structure	Address	Proposed Impact
609	Cloghran Church (in ruins) & graveyard	Stockhole Lane, Cloghran, Swords	Temporary restriction of access to Stockhole Lane during the construction phase

The impact appears to be minimal as it is limited to a temporary restriction of access to the western end of Stockhole Lane. It should be noted that the boundary wall of the graveyard is of historical significance as it was amended during World War II/The Emergency with the addition of gun emplacements as part of the defences for Collinstown Airfield (now Dublin Airport). Care needs to be taken that there are no impacts on the boundary of Cloghran Church & Graveyard from vibrations during the construction phase.

3. Clarification of Changes Fronting Castlemoate House

RPS No.	Protected Structure	Address	Proposed Impact
611	Castlemoate House	R132 (Swords Road), Cloghran, Swords	Potential alteration to boundary onto R132 to facilitate cycle track and footpath

Section 16.4.4.1 of the EIAR indicates that the impact relates to the removal of trees to the south of the historic house which assist in screening the large airport hangar structures within the Dublin Airport complex. These trees are modern planting on the line of the original entrance avenue and gate lodge to Castlemoate House which was altered sometime in the past, possibly when the road was widened. They are of benefit to Castlemoate House in terms of visual screening. It is important that the replacement trees to the south of Castlemoate House are mature trees and that the new planted buffer is of sufficient depth and height to substantially screen the tall hangar structures to the west.

Clarification is sought as to whether the roadside boundary and vehicular entrance to Castlemoate House is to be altered to allow for the provision of the proposed cycle track and footpath. The existing are not the original boundary treatment and entry to the historic house (see late 20th century image below of Coachman's Inn with boundary to Castlemoate House to right hand side).

It is difficult to discern whether any additional land take from Castlemoate House is required to facilitate the track and path. Clarification on proposed changes to the eastern boundary of Castlemoate House is requested. Should alterations be required for the proposal then details are to be provided in both plan and elevation drawings and provided to the Fingal Conservation Officer for agreement.

4. Impact on Front Boundary of Protected Structure RPS No. 604 Thatched Cottage, Collinstown

RPS No.	Protected Structure	Address	Proposed Impact
604	Thatched Cottage	R132 (Swords Road), Collinstown Cross, Collinstown	Alteration to boundary onto R132 to facilitate cycle track and footpath

Fingal only has a handful of historic thatch structures remaining within its jurisdiction which raises its significance. The cottage at Collinstown is located on a small site and any further reduction of it would have a detrimental impact on the protected structure. In the EIAR it is indicated that the impact of the proposed works during the Construction Phase is high as there is a land take proposed to facilitate the cycle track and footpath and an alteration of the cottage's setting. This is considered highly problematic and it is requested that this proposal is re-designed to avoid impacting on the protected thatched cottage and its setting. This may necessitate an amendment to the design of the footpath and cycle track for a limited distance.

5. Clarity on Extend of Impact on Boundary Wall of Santry Demesne

Historic Designed Landscape	Address	Proposed Impact
Santry Demesne	R132 (Swords Road), Santry	Alteration to boundary onto R132 to facilitate cycle track and footpath

Santry Demesne is indicated in the EIAR as the most substantial surviving historic landscape that interfaces with the proposed scheme. It contains a Recorded Monument and is a proposed Natural Heritage Area and a Water Framework Directive Register of Protected Areas. The Fingal Development Plan 2023-2029 contains several objectives in relation to protection of mature trees (Objective CISO52, GINHO23 and GINHP21) and historic designed landscapes (HCAP18 and HCAP19). Section 16.4.3.5 of the EIAR indicates that it is proposed to widen a gateway to make a cycle path connection and to "cut back" the demesne wall. The surviving built historic features of the demesne are limited and should only be removed as a last resort. The EIAR indicates that the proposed works to Santry Demesne will have a medium magnitude, direct negative, impact. However, it is difficult to discern from the plan drawings the exact extent of the proposed "cut back"/demolition of the demesne wall and whether this is limited to sections that have been previously amended. Clarity is requested in terms of the proposed changes to the eastern boundary of Santry Demesne. A photomontage would also assist in evaluation of the potential impact.

Transportation

Modification of Junctions

The proposed signalisation will result in much needed safety improvements for pedestrians and cyclists. The size of some of the resulting junctions will need staging to minimise wait times for all sustainable users. Some of the junction treatments indicate continuous footpaths on less busy industrial or commercial accesses. Any interface with traffic would need warning signage/ colour/ material differentiation to warn pedestrians and cyclists that they are in an interface zone.

Pinnock Hill Junction

The final tie in point for the Fornerstown Link Road may result in some layout changes in the vicinity of this junction. NTA should note the requirement to liaise with Fingal County Council in this regard.

Airport roundabout

The cycleway is incoherent for this part of the scheme and will result in some south bound cyclists remaining in the bus lane. This is not considered to provide an acceptable level of safety and comfort for cyclists through this busy junction.

Integration with Cycling

Fingal County Council has an extensive programme of cycling and walking improvements planned to maximise the passenger catchment of the various existing and proposed public transport services along the Swords-Airport-City Centre corridor, under the auspices of the NTA's GDA Cycle Network. The provision of the CBC represents an opportunity to provide enhanced levels of service to sustainable transport users and the provision of smaller interventions as part of the CBC proposals to improve accessibility should be incorporated into the proposed development design. For instance, the inclusion of at least 10-20 cycle stands at all CBC bus stops should be applied as standard across the scheme, rather than "where practicable" as proposed in the application, to facilitate multi-modal trips and increase the catchments of the bus services. This would be consistent with Objective DMSO114 – Provision of Bicycle Parking at Public Transport Stations / Stops Ensure that all new and renovated public transport stations/stops provide appropriate levels of cycle parking provision based on the existing and proposed passenger levels, surrounding environments and future transportation infrastructure. The proposed improvements to the bus corridor will bring substantially enhanced levels of service for bus users and will also bring improved walking and cycling facilities. Fingal County Council supports the improvements for walking and cycling at several of the proposed junctions along the bus corridor. It would facilitate those passengers who wish to make the first or last leg of their journey by bicycle, and thereby extend the bus network catchment. The provision of cycle parking at all bus stops, in sufficient quantities, should be a condition of any grant of planning permission. This would be consistent with NTA, Fingal County Council and wider public policy.

Drainage

Fingal County Council notes the contents of the Flood Assessment. The three-stage site-specific flood risk assessment summarized the entirety of the route to be at high risk of fluvial flooding, particularly around the R132. The route was deemed to be at low risk of Coastal, Estuarine, Pluvial and Groundwater flooding. The scheme also meets the justification test criteria.

The risk of fluvial flooding (Cuckoo Stream, Mayne River, Santry River and River Tolka) to the route was considered high however the present level of flood risk will be maintained & not increased by the proposed scheme. The risk of pluvial flooding, albeit low, should be reduced by the introduction of any SuDS or nature-based solutions to reduce surface water runoff. This should also be an improvement on any infrastructure being replaced. It is welcomed that new drainage infrastructure provided will

include new Sustainable (Urban) Drainage Systems (SuDS) such as swales/Grass surface water channels, filter drains, tree pits & attenuation ponds. These SuDS features will provide surface water storage and reduce the risk of pluvial flooding.

Fingal County Council promotes the implementation of nature-based solutions to the management of rainwater and surface water runoff in urban areas wherever possible and further detailed SuDS design should continue to be aligned with the principles of the best practice SuDS guidance documentation available.

Conclusion

Fingal County Council welcomes the decision to progress with the Swords Core Bus Corridor project and believes that it will deliver significant benefits to the Swords-Dublin Airport-Dublin City corridor, Fingal and the wider Dublin region. There are certain areas that require further consideration, as set out in the foregoing, and we look forward to working with the Bord and the applicant, as appropriate, to assist in addressing these issues in order to facilitate the delivery of this key piece of infrastructure.

Yours faithfully,


 **Matthew McAleese, Director of Services**
Planning and Strategic Infrastructure Department