



**RINGSEND TO CITY
CENTRE CORE BUS
CORRIDOR**

**NTA OBSERVATIONS ON
THE PROPOSED
SCHEME SUBMISSIONS**

November 2023

**BUS
CONNECTS**

SUSTAINABLE TRANSPORT FOR A BETTER CITY.

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1. Introduction

This report provides a response to the submissions made to An Bord Pleanála (“the Board”) in response to the application under Section 51 of the Roads Act 1993, as amended, for approval of the Ringsend to City Centre Core Bus Corridor Scheme (“the Proposed Scheme”).

An overview of the submissions is provided in Section 1.2 below. The issues raised in the submissions on the Proposed Scheme, together with responses thereto are provided in Section 2.

Where the same issue is raised in a number of submissions and/or objections, this report identifies the individuals who raised those issues and provides a composite response to each issue raised.

1.1 Overview of Submissions Received

A total of 23 submissions were received by the Board.

The submissions in response to the Proposed Scheme are broken down into groups either associated with a particular location along the Corridor or of a more general nature below. Table 1.1 below sets out the locations referred to, the number of submissions on the Proposed Scheme referring to each location and the key issues raised by the submissions.

Table 1.1: Summary of Submissions in Response to the Proposed Scheme by Section

Section	Location	No. of submissions	Key Issues Raised
1a	Northern Liffey Quays - West	10	<ul style="list-style-type: none"> Concerns in relation to impacts on CHQ Dublin Removal of westbound right turn from North Wall Quay at Commons Street Disruption during construction at Custom House Docks Delays and uncertainty once scheme is approved. Concerns in relation to impacts on property at 1 North Wall Quay Request to maintain Scherzer Bridges in situ Request to widen pedestrian and cycle facilities Request for interim improvements at Samuel Beckett Bridge
1b	Northern Liffey Quays - East	8	<ul style="list-style-type: none"> Concerns in relation to access to the 3-Arena Concerns raised by TII in relation to interactions with the Luas Line at Mayor Street Concerns in relation to impacts on City Block 9 Request to maintain Scherzer Bridges in situ Request to widen pedestrian and cycle facilities Interim Improvements at Samuel Beckett Bridge Omission of works at Tom Clarke East Link Bridge from scheme
1c	Southern Liffey Quays – West	1	<ul style="list-style-type: none"> Pedestrian and cycle facilities at southwest corner of Samuel Beckett Bridge
1d	Southern Liffey Quays - East	3	<ul style="list-style-type: none"> Pedestrian and cycle facilities at southeast corner of Samuel Beckett Bridge

Section	Location	No. of submissions	Key Issues Raised
2	River Dodder Public Transport Opening Bridge	3	<ul style="list-style-type: none"> • Visual Prominence of new rowing club building, as seen from Portview House • Support for the provision of the Dodder Public Transport Bridge
3	Ringsend / Irishtown	12	<ul style="list-style-type: none"> • Impacts on Strand Street • No consideration given to the Waxies' Dargle monument at Pembroke Street • Objections to cycling in Ringsend Park • Suggestions for alternative cycle routing • Maintenance of local access to Cambridge Park / Pembroke Cottages and Ringsend Park • Cycle track alignment and tie-in
All	Whole scheme	5	<ul style="list-style-type: none"> • Co-ordination with other projects • Support for the scheme. • Construction stage impacts • Protection of biodiversity • Concerns about cost of making a submission • Width of cycle facilities

2. Response to Submissions on Proposed Scheme

2.1 Section 1a: Northern Liffey Quays - West

2.1.1 Description of Proposed Scheme at this Location

As set out in Section 4.5.1 of Chapter 4 in Volume 2 of the EIAR, this section of the Proposed Scheme will commence at the Talbot Memorial Bridge and will proceed eastwards along the north quays and will conclude at Samuel Beckett Bridge.

Multiple structures, as set out in Section 4.6.8 of the EIAR, are proposed along this Section to accommodate the Proposed Scheme. The historic Scherzer Bridges at George's Dock will be relocated to either side of the carriageway to facilitate the addition of bus lanes, while two boardwalk structures along the R801 on Custom House Quay and North Wall Quay will be constructed to assist with facilitating pedestrian movement. Full bus priority is proposed in both directions along the entire length of the north quays. A two-way cycle track will be provided along the southern side of the road throughout the entirety of Section 1a.

At the northern end of Samuel Beckett Bridge at the junction of R801 North Wall Quay with Guild Street, some eastbound buses may wish to turn right onto the bridge. These buses will be detected on their approach and the bus lane signal will be released in advance of general traffic by a dedicated bus lane signal. This will enable some bus services to turn right from the bus lane on the left side of the traffic lane. These buses will not need to weave right across general traffic to reach the right-turn lane. General traffic in both directions will move in a separate signal stage after the bus stage has finished. Similar right-turn advance bus lane signals will operate in the eastbound direction at the junction of Commons Street on R801 North Wall Quay.

Temporary land acquisition is required for a Construction Compound at the Scherzer Bridges to facilitate works. These lands will be reinstated in line with existing conditions and / or urban realm improvements (as applicable) following the completion of works.

Extracts from the General Arrangement Drawings, which are provided in Volume 3 of the EIAR, are included below in Figure 2-1-1a, 2-1-1b, 2-1-2a and 2-1-2b.

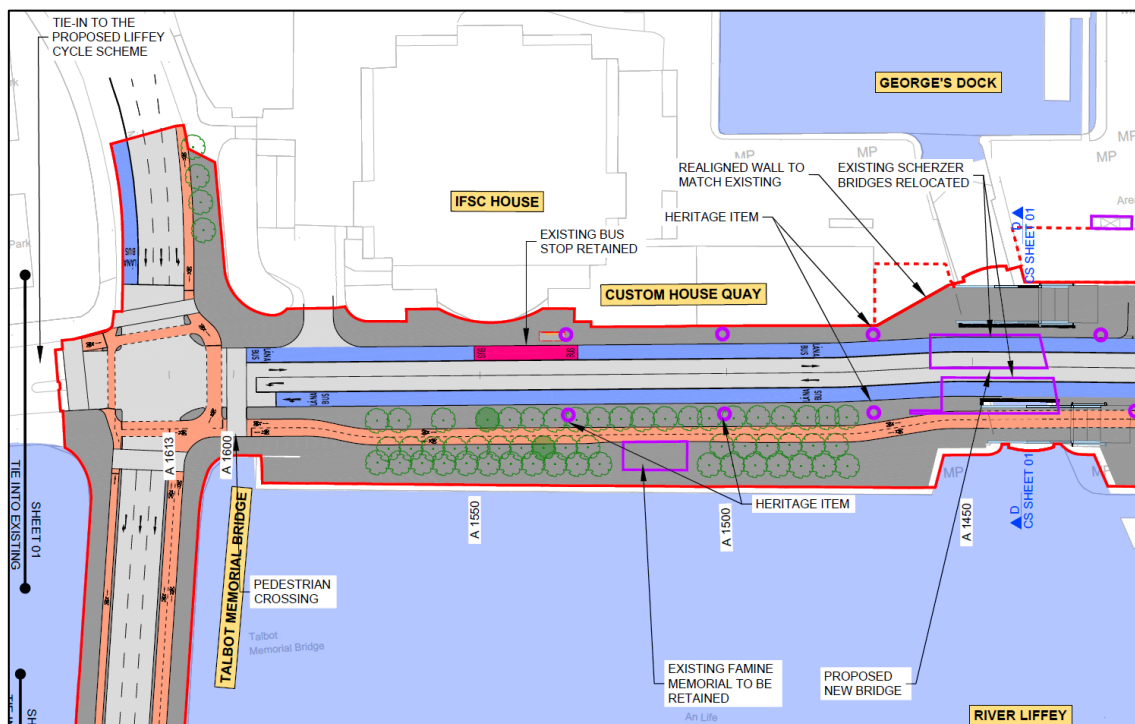


Figure 2-1-1a: Extract from General Arrangement Drawing Sheet 1 Part 1 North

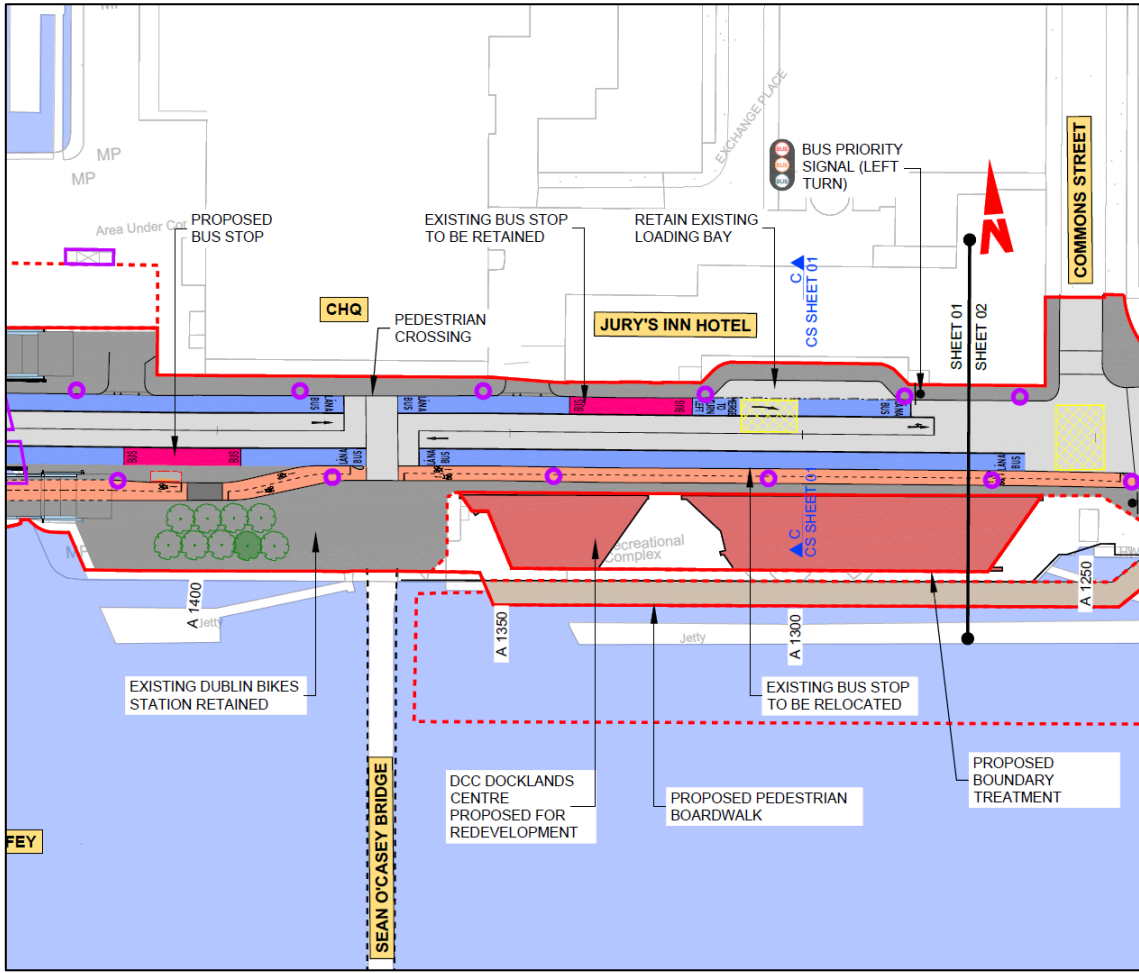


Figure 2-1-2b: Extract from General Arrangement Drawing Sheet 1 Part 2 North

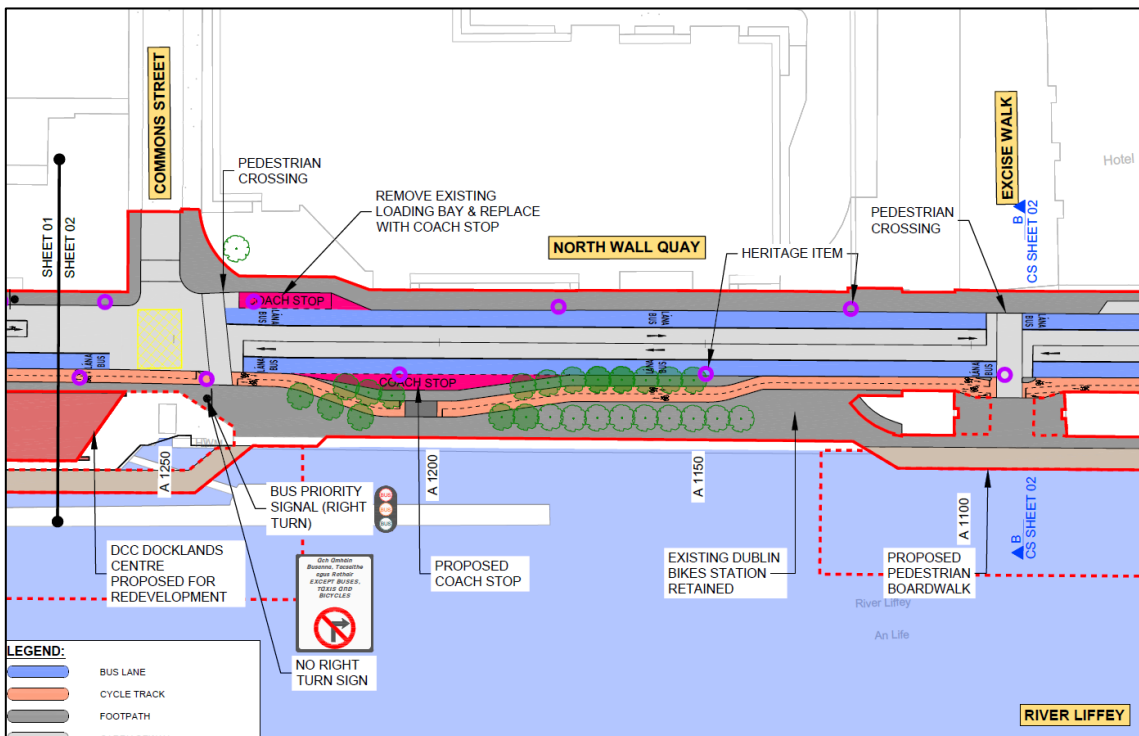


Figure 2-1-3a: Extract 2 from General Arrangement Drawing Sheet 2 Part 1 North

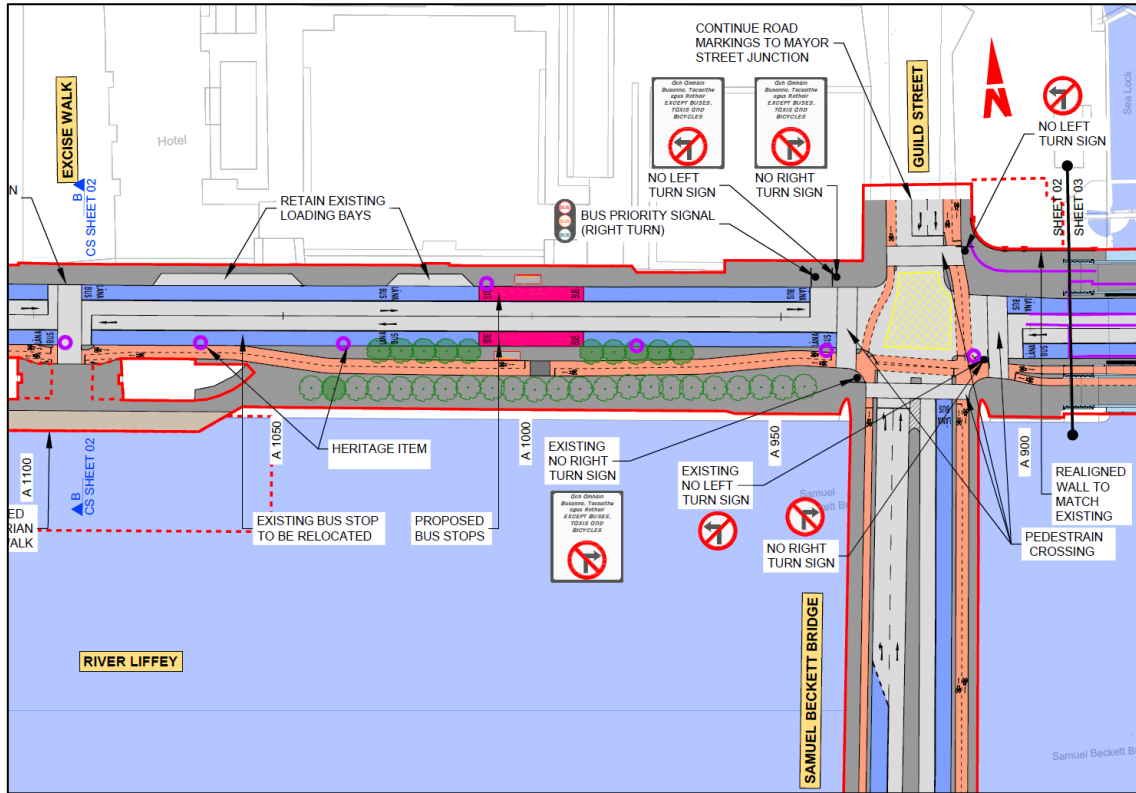


Figure 2-1-4b: Extract 2 from General Arrangement Drawing Sheet 2 Part 2 North

2.1.2 Overview of Submissions Received

Table 2.1 below lists the individual submissions made in respect of the Proposed Scheme in Section 1a Northern Liffey Quays - West.

Table 2.1: Submissions Made in Respect of Section 1a: Northern Liffey Quays - West

No	Name	No	Name	No	Name
5	CHQ Dublin Limited	10	Dublin Cycling Campaign	18	Park Rite & IFSC Car Park
6	Councillor Claire Byrne	16	NWQ Devco Limited		
7	Custom House Docks Management Ltd	17	OPCO Customs House DAC		

2.1.3 Issues Raised for Section 1a

2.1.3.1 Concerns in relation to impacts on CHQ Dublin

Summary of issue raised:

The following key issues were raised in the submission by John Spain & Associates on behalf of CHQ Dublin Ltd., and by Tom Phillips & Associates for Custom House Docks Management Ltd.:

There is an overlap with the Compulsory Purchase Order (CPO) at this location, and only the issues of wider public interest are addressed in this response document as follows:

Temporary CPO for the construction compound, associated noise and disruption from the compound, and the duration of the temporary acquisition. CHDM also say that the EIAR 'does not clarify or describe the full nature of the works proposed that result in the requirement to acquire the relevant lands on a temporary and permanent basis'.

- a) Temporary CPO for the construction compound, associated noise and disruption from the compound, and the duration of the temporary acquisition.
- b) Reduced pedestrian access in 5m wide strip between the proposed compound and the CHQ building.
- c) Planning permission sought by CHQ Dublin Limited for 'Major Food Hall and Market' at CHQ Building.

The other specific property related issues are addressed in a separate response document to the CPO.

Responses to issues raised:

a) Temporary Plot for Construction Compound

The proposed construction compounds are described in EIAR Volume 2, Chapter 5 Construction, Section 5.7, which describes the full nature of the works proposed that result in the requirement to acquire the relevant lands on a temporary basis for the construction compounds. Compound R1 will have 4 parts, with the main area located on CPO Plot No.1003(4) on the plaza area on the south-eastern side of George's Dock and west of the CHQ building. Ancillary parts of the compound will be located on the western side of the northern Scherzer Bridge, and on the other side of the road on the River Liffey campshire on each side of the southern Scherzer Bridge. Images of the proposed compound that is included in the EIAR are shown in Figures 2-1-3 and 2-1-4 following.

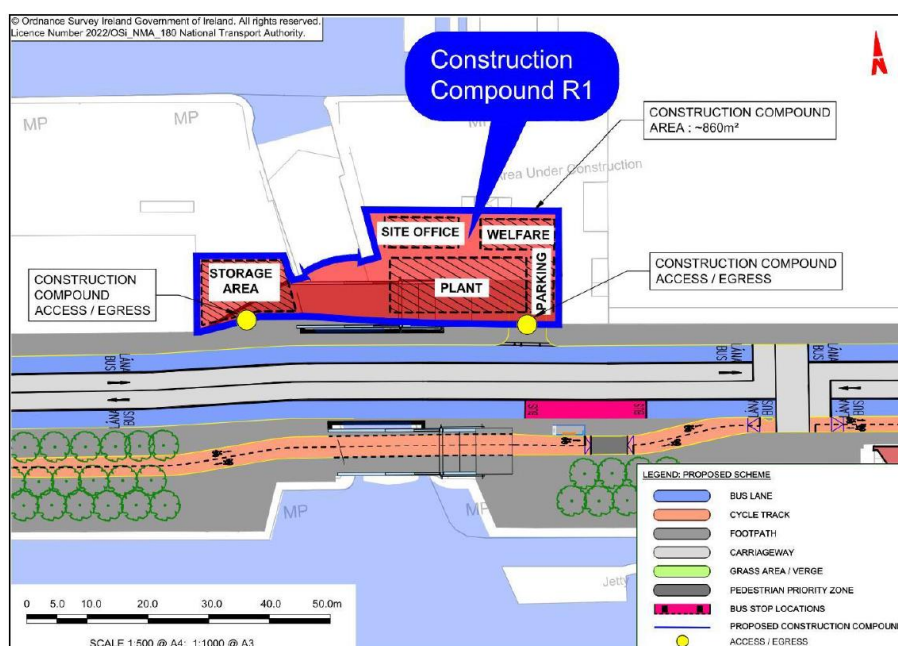


Image 5.1: Location and Extent of Construction Compound R1

Figure 2-1-3: Extract from EIAR Chapter 5

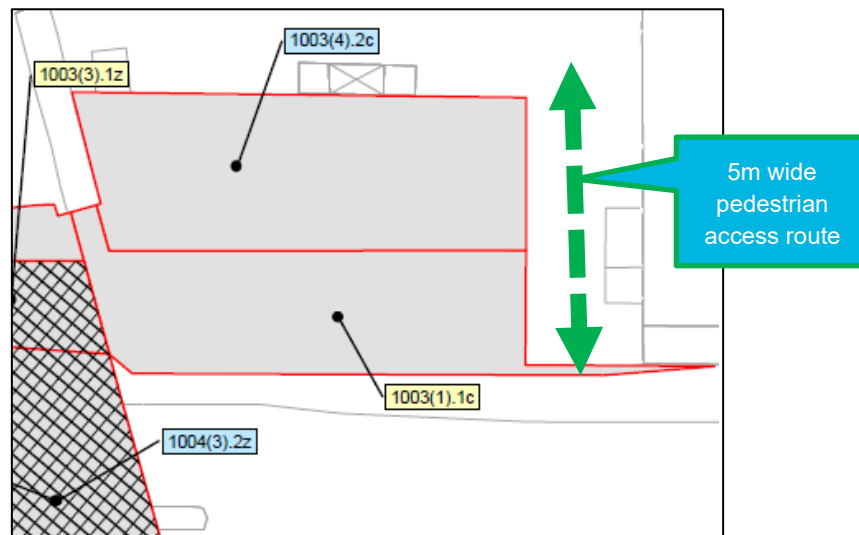


Figure 2-1-6: CPO Plots at CHQ

Duration of Temporary CPO

Temporary CPO Plot No.1003(4) will be required for at least 24 months for Construction Compound R1. Once the works in Section 1a are completed, the compound will be removed, and the area will be reinstated for return to the existing property owners within the following 6 months. It is anticipated therefore that the duration of the temporary land acquisition will be 30 months from the starting date of the construction period.

Construction Noise at the Compound R1

The construction works at George’s Dock are described in EIAR Volume 2, Chapter 5, Section 5.5.4.1. The main use of the compound area will be for offices, welfare facilities and car parking. Part of the compound will accommodate a construction crane for lifting heavy components at the bridges. EIAR Volume 2, Chapter 9, Noise & Vibration, Section 9.5.1 describes the anticipated noise that will arise during the construction process which is summarised in Table 9.53 as follows for this location:

Table 9.53: Summary of Predicted Construction Phase Impacts Following the Implementation of Mitigation and Monitoring Measures

Assessment Topic	Period over which Criterion Applies	Potential Impacts (Pre-Mitigation and Monitoring)	Predicted Impact (Post Mitigation and Monitoring)
Bored Piling and Additional Construction Works	Monday to Friday: Daytime (07:00hrs – 19:00hrs)	<ul style="list-style-type: none"> Negative, Moderate to Significant and Temporary to short-term at NSLs within 15m of the proposed works; Negative, Slight to Moderate and Temporary at NSLs within 20m to 50m of the proposed works; and Negative, Not Significant, and Temporary at distances greater than 50m from the proposed works. 	<ul style="list-style-type: none"> Negative, Slight to Moderate and Temporary at NSLs within 15m distance from the proposed works; and Negative, Not Significant and Temporary at NSLs at distances greater than 15m from the proposed works.
	Monday to Friday: Evening: (19:00hrs – 23:00hrs) or Saturdays (08:00hrs – 16:30hrs)	<ul style="list-style-type: none"> Negative, Significant to Very Significant and Temporary to short-term at NSLs within 25m of the proposed works; Negative, Moderate to Significant and Temporary at NSLs 25m to 50m of the proposed works; Negative, Slight to Moderate and Temporary at NSLs 50m to 60m of the proposed works; and Negative and Not Significant at distances greater than 60m from the proposed works. 	<ul style="list-style-type: none"> Negative, Moderate to Significant and Temporary at NSLs within 15m from the proposed works; Negative, Slight to Moderate and Temporary at NSLs within 15m to 20m from the proposed works; and Negative, Not Significant and Temporary at NSLs at distances greater than 20m from the proposed works.

The applicable impact is highlighted in the above table as “*Negative, Not Significant and Temporary at distances greater than 15m from the proposed works*”. The CHQ building is located more than 35m east of the bridge locations, and the proposed pedestrian link route on the eastern side of the compound

will be 30m from the works area. Disturbance due to construction noise in the vicinity of the CHQ building will therefore be minimal.

b) Pedestrian Access East of Compound R1

As is annotated on Figure 2-1-6 earlier, a 5m wide pedestrian access route will be retained between the eastern edge of the proposed construction compound and the nearest edge of the CHQ building, where there is an emergency exit stairwell on the western side of the building.

c) CHQ Dublin Ltd. Planning Permission for 'Major Food Hall and Market' at CHQ Building

The NTA note that CHQ Dublin Limited are currently seeking planning permission for 'a major Food Hall and Market' in excess of 2,000 square metres pending a decision under Dublin City Council Reg. Ref.: 3251/23. The submission goes on to say that should planning permission be granted, it is intended that this development will commence in 2024 and become operational in 2025. The NTA acknowledge its omission from the assessment of cumulative effects for the Proposed Scheme however as the vast majority of this proposed development (i.e. that proposed by CHQ Dublin Ltd.) will largely comprise of works to the internal structure and arrangements of the CHQ building (together with a relatively small extension along the eastern façade / exterior of the building), the potential cumulative effects are likely to be limited and not significant. Nevertheless, interfaces with other projects during the construction phase of the Proposed Scheme will be managed in line with Section 5.9 of Chapter 5 (Construction) in Volume 2 of the EIAR, namely that interface liaison will take place on a case-by-case basis through the NTA, and will be set out in the Construction Contract, to ensure that there is coordination between projects, that Construction Access Routes remain unobstructed by the Proposed Scheme works and that any additional construction traffic mitigation measures required to deal with cumulative impacts are managed appropriately.

It should be noted that potential effects on the CHQ Building (DCC RPS 2094) and the Triumphal Arch (NIAH 50011219) from an architectural heritage perspective are considered and assessed in Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR.

2.1.3.2 Removal of Right Turn to Commons Street from North Wall Quay

Summary of issue raised:

Various submissions raised concerns in relation to the proposed removal of the westbound right turn from North Wall Quay to Commons Street and the associated impacts on the accessibility of the Mayor Street area.

Responses to issues raised:

The Preferred Route Option Report sets out the consideration given to the removal of the right-hand turn from North Wall Quay onto Commons Street as part of the Proposed Scheme. As such, the Traffic Assessment (Chapter 6 in Volume 2 of the EIAR) are based on the Proposed Scheme as designed, which includes for the removal of the right-hand turn from North Wall Quay onto Commons Street.

There are six existing vehicular access points to the zone between the River Liffey north quays, Memorial Road / Amiens Street, Seville Place / Sheriff Street Upper and East Wall Road. These are:

- 1) From the Custom House along Custom House Quay
- 2) From Seville Place
- 3) From East Road
- 4) From East Wall Road
- 5) From the East Link Bridge
- 6) From Samuel Beckett Bridge.

In the Supplementary Information the Preliminary Design Report (PDR) Chapter 12 Section 12.1.2 Traffic Diversion Routes describes the alternative access routing to the Mayor Street Lower area following completion of the scheme:

- 1) No change – left turn access to Commons Street from Custom House Quay.
- 2) No change – access via Oriel Street
- 3) No change – access via Sheriff Street Upper, Seville Place and Oriel Street
- 4) Coming from East Wall Road, rather than continue to the Point roundabout and turn onto North Wall Quay, traffic should turn right onto Sheriff Street Upper, continue onto Seville Place, before turning left onto Oriel Street to access the Mayor Street area. It is likely that most traffic uses this route already to avoid congestion at the Scherzer Bridges at Spencer Dock. The journey distance from East Wall Road at the junction with Sherriff Street Upper to the IFSC car park on Commons Street is the same at 1.7km via either route.
- 5) Coming from the East Link Bridge, rather than turn left at the Point roundabout onto North Wall Quay, traffic should continue north to turn left onto Sheriff Street Upper, continue onto Seville Place, before turning left onto Oriel Street to access the Mayor Street area. It is likely that most traffic uses this route already to avoid congestion at the Scherzer Bridges at Spencer Dock. The journey distance from The Point Roundabout to the IFSC car park on Commons Street will increase by 0.6km from 1.4km to 2.0km.
- 6) Coming from Samuel Beckett Bridge, rather than turn left onto North Wall Quay, traffic should continue north on Guild Street and onto Seville Place, before turning left onto Oriel Street to access the Mayor Street area. The journey distance from the Beckett Bridge to the IFSC car park on Commons Street will increase by 0.55km from 0.45km to 1.1km.



Figure 12.5: Local Diversion Routes for Westbound Traffic Right Turn Movements off North Wall Quay

Figure 2-1-7: Local Access Map to Mayor Street Area (from PDR Chapter 12)

2.1.3.3 Delays and Uncertainty once scheme is approved.

Summary of issue raised:

Custom House Management Ltd. raised concerns in relation to the potential for delays and uncertainty following scheme approval.

Responses to issues raised:

Following the approval of the Section 51 Application for the scheme and the Compulsory Purchase Order being confirmed, notification of the confirmation should be served on the affected landowners and the decision of the Order must be published within 12 weeks. Under current legislation, within 18 months of the compulsory purchase becoming operative, a notice to treat must be served on the affected landowners. If the Acquiring Authority (The NTA is this case) does not serve the notice within

this timescale, then the Compulsory Purchase Order is annulled, and the Authority must start the process from the beginning again. These timelines based in current legislation will provide a level of certainty and clearly sets out the obligations relating to the acquisitions of property through the CPO process.

2.1.3.4 Request to maintain Scherzer Bridges in-situ.

Summary of issue raised:

Councillor Claire Byrne submitted that the historic Scherzer Bridges at George's Dock (and at Spencer Dock further east) should be maintained in-situ.

This issue was also raised in the submission by Dublin City Council included in Section 2.9 of this response document.

Responses to issues raised:

Options for the Scherzer Bridges were considered and determined as outlined in the Preferred Route Option Report, which is synopsised in EIAR Volume 2, Chapter 3 Consideration of Reasonable Alternatives.

The Need to Relocate the Scherzer Bridges

The NTA recognises the two pairs of Scherzer Bridges as distinctive historical landmarks in the Dublin Docklands that symbolise the heritage of the former port activities in this part of Dublin. In this regard careful consideration was given to the challenges to achieve the Proposed Scheme objectives set out in EIAR Volume 2, Chapter 1 Introduction, Sections 1.2, while respecting these heritage features, in particular to enhance the capacity and potential of the public transport system by improving bus speeds, reliability and punctuality through the provision of bus lanes and other measures to provide priority to bus movement over general traffic movements, to enhance the potential for cycling, and to ensure that the public realm is carefully considered in the design and development of the transport infrastructure and seek to enhance key urban focal points where appropriate and feasible. In EIAR Volume 2, Chapter 3 Consideration of Reasonable Alternatives, Sections 3.4.1.1.1 and 3.4.1.1.2, there is a description of the challenges for bus priority at these locations, and a summary of the numerous alternatives that were considered. This subject is covered in greater detail in the Supplementary Information Preferred Route Option Report Section 6.1.2.

There is a strategic need to improve bus priority along the north quays which is one of the main arteries linking the city centre to Dublin Port, the ferry terminals, and Dublin Airport via the M50 Tunnel. This is one of the busiest bus routes in the city as it carries both city bus services and coaches towards the Airport and the northern part of the country. Many Bus Éireann services from Busáras, the Swords Express, Airlink, Aircoach, numerous national coach services to the northeast and northwest regions, and other coaches from the south of the country that terminate at Dublin Airport, all use the north quays route. In addition there is a large volume of taxi traffic on the route. All of these public transport services currently suffer significant delay on this route, mainly caused by the narrowing of the road to a single traffic lane through each of the two Scherzer Bridge pinch-points. Much of the benefits of the Proposed Scheme for public transport journey time and reliability are obtained from the removal of these constraints to provide continuous bus lane priority. In this instance the adjoining traffic lane is too busy and the proximity to major junctions are such that signal-controlled bus lane priority is not a viable alternative option. The Scherzer Bridges have to be repositioned to achieve the necessary bus lane priority on this major route.

Ongoing deterioration of the historic Scherzer Bridges requires restoration works to ensure their long-term survival. These preservation works cannot be undertaken on site, and especially not while the bridges carry heavy volumes of traffic for which they were never intended. The bridges need to be carefully disassembled and removed to a workshop where they can be restored part by part under suitable sheltered conditions and then reassembled. The Proposed Scheme should therefore be seen to provide a valuable opportunity to safeguard these important heritage features for posterity. In this regard the Proposed Scheme will enable the Protected Structure status to be actively addressed, which could not otherwise happen. If these bridges were to remain in their current locations it would not be

possible to properly preserve them. Neither would it be practicable to remove them for preservation and then to reinstate them in their current locations, as this would involve much longer disruption to all modes of transport along this major route, with no improvement for the long term operation of the core bus corridor.

In the Proposed Scheme there will be a balance between the needs to preserve and protect the industrial heritage of the past port activities in the Dublin Docklands, while making suitable provision for the ongoing growth and redevelopment of this core part of the city centre area. As is demonstrated by the photographs in the DCC submission, the context around these bridges has changed dramatically, and there now are generous public realm areas where the structures can be made accessible for the general public to inspect and admire in a way that is not currently possible under the stresses of their current locations. In many ways the Proposed Scheme proposals are similar to the way that Dublin Port has erected an old crane from the same period as a prominent monument in the plaza area around the port company headquarters in front of the junction of East Wall Road and Sherriff Street Upper. This new and highly visible landmark celebrates the history of Dublin Port, and it would be complemented by similar landmarks with the restored Scherzer Bridges occupying prominent positions in the public realm areas at George's Dock plaza beside the Epic museum, in Spencer Dock public park, and on the River Liffey campshires.

In conclusion, the Proposed Scheme considered all feasible options in relation to the provision of necessary bus priority and concluded that the Scherzer Bridges need to be relocated locally. The Proposed Scheme includes very significant proposals to conserve, celebrate and promote the heritage value of the Scherzer Bridges protected structures which would otherwise be very difficult to implement if the bridges were to remain in their current locations carrying heavy traffic loads.

These historic structures will benefit significantly from being relocated and restored, and their new position in the pedestrian realm will allow the general public to admire and appreciate the structures as may be seen in the EIAR Volume 3 Figures, Chapter 17 Landscape and Urban Realm, Section 17.2 Photomontages, View R-08 shown below.

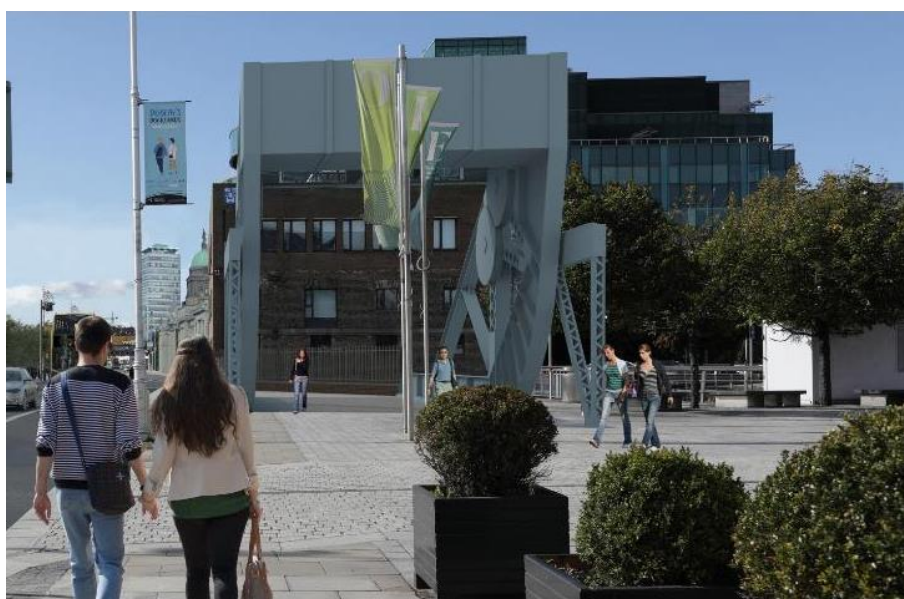


Figure 2-1-8: Photomontage R-08 relocated northern Scherzer Bridge at George's Dock

Section 3.1 of the Preferred Route Options Report, and Section 3.4.4 and Appendix 3.1 of the EIAR set out the alternatives that were considered in coming to the preferred scheme. The report in Appendix 3.1 of the EIAR was prepared by John Kelly, Architect, Fergal McNamara, Grade 1 Conservation Architect, and Fred Hammond, Industrial Heritage Expert. The subsequent Architectural Heritage Assessment (Chapter 16) within the EIAR was carried out by Cathal Crimmins Architects, who are accredited Grade 1 Conservation Architects with many years of conservation experience gained on a wide range of historic building projects. Section 16.2, and in particular Section 16.2.4, of Chapter 16 of the EIAR set out the relevant guidelines, policies and legislation that the assessment adhered to and has been informed by. As such, the proposals have been devised in consultation with, and assessed by, specialists in the heritage field.

2.1.3.5 Request to widen pedestrian and cycle facilities

Summary of issue raised:

The submission from Councillor Claire Byrne notes that the current pedestrian and cycle facilities along the north quays are too narrow, and that there does not appear to be a proposal to make them wider and safer. Similarly, the submission from Dublin Cycling Campaign requested that cycle tracks would be widened at the Dublin City Council offices.

Responses to issues raised:

2.1.3.5.1 Cycle Facilities

The cycle facilities along the north quays are being significantly widened where feasible, and gaps in the existing cycle tracks will be removed through provision of a continuous two-way cycle track. The General Arrangement Drawings Sheets 1 to 5 in EIAR Volume 3 Figures, Chapter 4 Proposed Scheme Description Part 2 show the proposals for improved and continuous cycling facilities along the north quays. In the Supplementary Information the Preliminary Design Report (PDR) includes Table 4-2 Road Cross-Section Detail which lists the locations for proposed cycle tracks where there are none at present and indicates the width of the proposed cycle tracks compared to the existing cycle tracks. In the extract from Table 4-2 below it may be seen that for example between Chainages A0-510 and A0-310 the existing cycle track on the campshire (inbound carriageway) will be widened from 2.7m to 3.5m wide.

Location	Existing Outbound Carriageway (eastbound)				Existing Inbound Carriageway (westbound)				Notes
	Proposed Outbound Carriageway (eastbound)				Proposed Inbound Carriageway (westbound)				
	Footpath Width (m)	Cycle Track Width (m)	Bus Lane Width (m)	Traffic Lane Width (m)	Traffic Lane Width (m)	Bus Lane Width (m)	Cycle Track Width (m)	Footpath Width (m)	
Ringsend to City Centre Route									
(Alignment A) Custom House Quay to 3 Arena									
CH. A0-780 to CH. A0-700	3.0-5.4	1.4-1.8	N/A	3.0-3.5	3.0	3.0	1.2-2.7	10.8-12.8	Parking area bay is of 2.2m wide on outbound.
	3.0-3.4	N/A	3.0	3.0	3.0	3.0	3.0-3.5*	2.0 min	*Two-way cycle track; **varying
CH. A0-700 to CH. A0-510	1.6-5.2	N/A	2.0-3.0	3.6	3.0-3.4	3.0	1.2-2.7	8.8-11.5	Parking area bay is of 2.55m wide on inbound and outbound.
	3.1-4.1	N/A	3.0	3.0	3.0	3.0	3.5*	2.0 min	*Two-way cycle track
CH. A0-510 to CH. A0-310	3.0-7.3	N/A	3.0	3.5	3.5	N/A	2.7	9.0-11.8	Parking area bay is of 2.75m wide on outbound & loading bay is of 2.90m wide on outbound from CH.0-400 to CH.0-340.
	3.2-5.6	N/A	3.0	3.0	3.0	3.0	3.5*	2.0 min	*Two-way cycle track
CH. A0-310 to CH. A0-040	3.2-4.4	N/A	3.0-3.5	3.0-3.5	3.5**	N/A	2.5-2.7	6.8-10.8	**varies; Parking area & loading bay is of around 3.0m wide on outbound from CH. 0-310 to CH.0-220. Parking area bay is of 2.6m wide on inbound.
	3.2-4.4	N/A	3.0	3.0	3.0	3.0	3.5*	2.0 min	*Two-way cycle track

Extract from Table 4-2 in the PDR

In EIAR Volume 3 Figures, Chapter 6 Traffic and Transport, Figure 6.4a shows that there are 5 gaps in the westbound direction and 7 gaps in the eastbound direction for cyclists. Four of these gaps in the cycling facilities are at junctions, including to the west of the Samuel Beckett Bridge; two are at buildings on the campshires, and there is a gap opposite the Convention Centre where there is a poorly defined shared area with pedestrians. There are a number of locations where the available space is constrained by buildings (namely the two glass restaurant structures at the Excise Walk junction and the Dublin City Council offices adjacent to Seán O Casey Bridge), where the cycle track reduces in width, but the cycle track is otherwise being widened to increase its capacity and safety. Further, sharp kinks and changes in direction along the existing cycle facilities are being removed. These measures combined will greatly improve the accessibility of the north docklands area by bicycle. The existing and proposed widths of the cycle track are set out in Table 4-2 of the Preliminary Design Report. While the Dublin City Council offices adjacent to Seán O Casey Bridge are currently undergoing redevelopment, the redevelopment, as permitted and under construction, retains the same footprint, and therefore it is not possible to further widen the proposed cycling facilities.

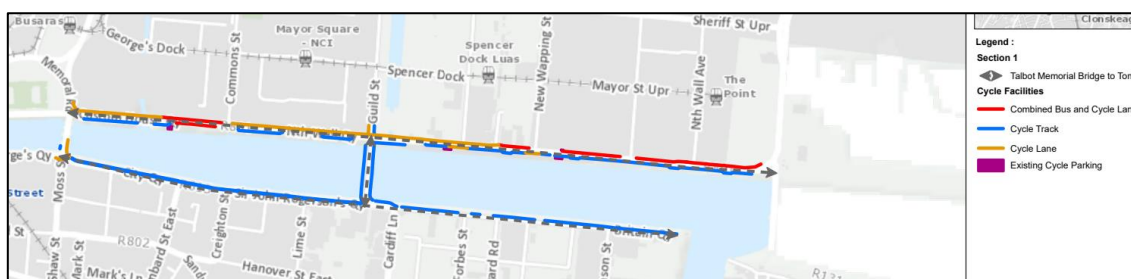


Figure 2-1-9: Extract from EIAR Chapter 6 Figure 6.4a showing existing cycling facilities in Section 1 of the Proposed Scheme

In EIAR Volume 2, Chapter 6 Traffic and Transport, Section 6.4.6.2.2 provides an assessment of the impact of the Proposed Scheme for the Level of Service for cycling facilities. Table 6.20, shown below, demonstrates that the cycling facilities on the north quays will be improved from Level of Service C to Level of Service A.

Table 6.20: Section 1 and 2 – Cycling Impact during Operational Phase

Location	Chainage	Do Minimum LoS	Do Something LoS	Impact	Sensitivity	Significance of Effect
Talbot Memorial Bridge: R801 Custom House Quay to R813 City Quay	A1613 – B10000	C	A	Medium	Medium	Positive Significant
R801 Custom House Quay and R801 North Wall Quay: Talbot Memorial Bridge to Samuel Beckett Bridge	A1613 – A900	C	A	Medium	High	Positive Very Significant
Samuel Beckett Bridge: R801 North Wall Quay to R813 Sir John Rogerson's Quay	A900 – B10700	B	B	Negligible	Medium	Not Significant
R801 North Wall Quay: Samuel Beckett Bridge to Tom Clarke Bridge	A900 – A0	C	A	Medium	Low	Positive Moderate
R813 City Quay and R813 Sir John Rogerson's Quay: Talbot Memorial Bridge to Samuel Beckett Bridge	B10000 – B10750	A	A	Negligible	High	Not Significant
R183 Sir John Rogerson's Quay: Samuel Beckett Bridge to Forbes Street	B10750 – B10950	C	A	Medium	High	Positive Very Significant
R183 Sir John Rogerson's Quay: Forbes Street to River Dodder	B10950 – B11427	B	A	Low	Negligible	Not Significant
Section Summary		B	A	Low	Medium	Positive Moderate

2.1.3.5.2 Pedestrian Facilities

The pedestrian facilities along the north quays are being significantly widened where feasible. The General Arrangement Drawings Sheets 1 to 5 in EIAR Volume 3 Figures, Chapter 4 Proposed Scheme Description Part 2 show the proposals for pedestrian facilities along the north quays, and in the Supplementary Information the Preliminary Design Report (PDR) includes Table 4-2 Road Cross-Section Detail which lists the existing and proposed widths of those pedestrian facilities.

There are a number of locations where the available space is constrained by buildings (namely the two glass restaurant structures at the Excise Walk junction and the Dublin City Council offices adjacent to Seán O Casey Bridge). At these locations, new boardwalks are proposed to create a continuous wide walking route along the riverside as shown in Figure 2-1-8 as a snapshot from General Arrangement Drawing Sheet 2 (EIAR Volume 3 Figures, Chapter 4 Proposed Scheme Description Part 2). These various measures proposed along the route will ensure a continuous wide pedestrian route is provided throughout Section 1a. In these two pinch-point locations there is no cycle track at present and the footpaths are restricted. In overall terms by adding the two proposed boardwalk sections to improve the pedestrian facilities, the cycling infrastructure is also enhanced. In EIAR Volume 2, Chapter 6 Traffic and Transport, Section 6.4.6.2.2.1 provides an assessment of the impact of the Proposed Scheme for

the Level of Service for pedestrian facilities and notes the improvements that will be provided by the proposed boardwalks at the buildings that currently obstruct the campshire areas.

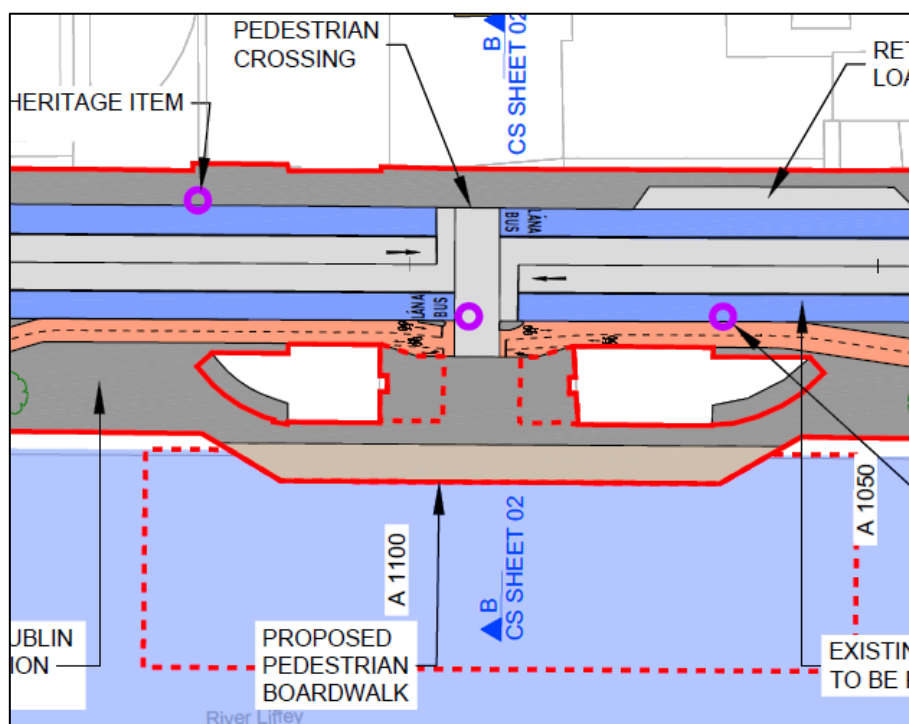


Figure 2-1-10: Proposed Boardwalk at North Wall Quay

In EIAR Volume 2, Chapter 6 Traffic and Transport, Section 6.4.6.2.2.1 provides an assessment of the impact of the Proposed Scheme for the Level of Service for pedestrian facilities. Table 6.19, shown below, demonstrates that the pedestrian facilities on the north quays will be generally improved from Level of Service C to Level of Service B or A.

Table 6.19: Section 1 & 2 – Significance of Effects for Pedestrian Impact during Operational Phase

Junctions	Chainage	Do Minimum LoS	Do Something LoS	Impact	Sensitivity	Significance of Effect
R801 Custom House Quay / R802 Talbot Memorial Bridge / R802 Memorial Bridge	A1600 – A1700	B	A	Low	Negligible	Not Significant
R801 Custom House Quay / Commons Street / R801 North Wall Quay	A1225 – A1275	A	B	Low	Low	Negative Slight
R801 North Wall Quay / Salesforce Tower Site Access	A625 – A650	E	B	Medium	Negligible	Not Significant
R801 North Wall Quay / Castleforbes Road	A300 – A350	B	A	Low	Negligible	Not Significant
R813 City Quay / R814 Lombard Street East	B10250 – B10300	C	A	Medium	Low	Positive Moderate
R813 Sir John Rogerson's Quay / Lime Street	B10550 – B10600	C	B	Low	Medium	Positive Moderate
R813 Sir John Rogerson's Quay / R813 Cardiff Lane / Sir John Rogerson's Quay	B10750 – B10800	C	B	Low	Medium	Positive Moderate
Sir John Rogerson's Quay / Asgard Road	B11000 – B11050	C	B	Low	Negligible	Not Significant
Sir John Rogerson's Quay / Blood Stoney Road	B11050 – B11100	C	A	Medium	Negligible	Not Significant
Sir John Rogerson's Quay / Britain Quay	B11150 – B11200	C	B	Low	Negligible	Not Significant
Sir John Rogerson's Quay / Benson Street	B11250 – B11300	C	B	Low	Negligible	Not Significant
Section Summary		C	B	Low	Low	Positive Slight

The one exception is on Custom House Quay between Chainages A1225 and A1275 where the Level of Service for Pedestrians will disimprove from A to B. This is at the Commons Street junction beside the Docklands Building on the campshire where there is no cycle track at present and the footpath will be narrowed a little to accommodate the proposed cycle track. In overall terms by adding the proposed boardwalk sections to improve the pedestrian facilities the cycling infrastructure is also enhanced.

2.1.3.6 *Interim Improvements at Samuel Beckett Bridge*

Summary of issue raised:

The submission from Councillor Claire Byrne requested improvements to the east side of Samuel Beckett Bridge in advance of the provision of further pedestrian / cycle bridges across the River Liffey in future.

Responses to issues raised:

The Proposed Scheme includes improvements at the junction of Guild Street / North Wall Quay / Beckett Bridge which will enable more priority and green signal time to be provided for all sustainable transport modes (pedestrians, cyclists, and buses). That junction is under significant pressure to cater for all modes of transport with the result that waiting times for pedestrians and cyclists are longer than desirable, which results in congestion on the very busy footpaths and cycle tracks. By diverting southbound left-turning on Guild Street to an alternative route, the traffic signal sequence can be simplified with more green time allocated to the east-west core bus corridor, and for the very busy north-south pedestrian and cycle route on the eastern side of Samuel Beckett Bridge and Guild Street. A major cross city cycle route runs through the eastern side of the junction between Guild Street and Samuel Beckett Bridge. There is also a particularly heavy peak pedestrian movement – in large part due to the presence of Spencer Dock train station to the north, and pedestrians arrive in large numbers at this junction leading to crowding. With the southbound traffic left-turn removed, this will allow all north-south modes to move at the same time, rather than in sequence as at present. In the EIAR Volume 4, Chapter 6 Traffic and Transport, Appendix A6.2 Junction Design Report it is shown that another 30% of the signal cycle time will be available to the north-south pedestrian and cyclist movements as a result of the proposed restriction of the southbound left-turn traffic movement. This means that the signals for pedestrians and cyclists can be green for 40% of the cycle time compared to only 10% at present. It will also release more green signal time for the east-west core bus corridor and enable signal-controlled priority to be provided for eastbound buses towards Ringsend and for the city centre orbital O route to turn right onto the Samuel Beckett Bridge.

It is also proposed to widen the footpath and cycleway on the southeastern corner of the bridge, as shown in General Arrangement Sheets 2 and 3 shown in Figure 2-1-11, which will result in a significant interim improvement to pedestrian and cycle conditions on the bridge. In EIAR Volume 4 Appendices, Chapter 6 Traffic and Transport, Appendix A6.4.1 Pedestrian Infrastructure Assessment indicates that the Level of Service for pedestrians at the southern end of the Samuel Beckett Bridge will increase from C to B.

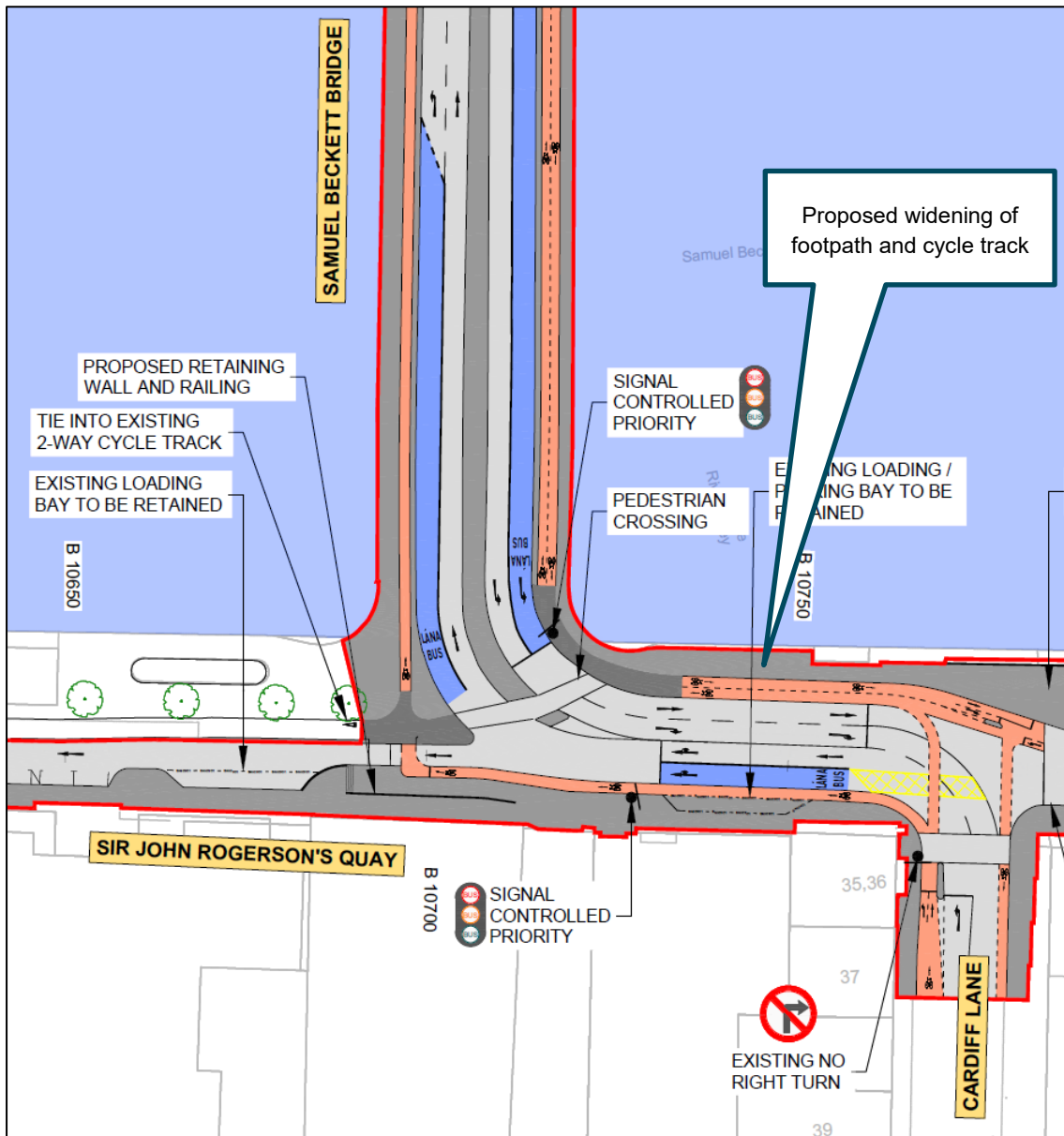


Figure 2-1-11: Proposed Scheme Layout at Southern end of Samuel Beckett Bridge

2.1.3.7 Layby at Hilton Garden Hill Hotel, Custom House Quay

The submission by A&L Goodbody for OPCO Custom House DAC concerns a location on the northern side of Custom House Quay where there is a loading layby in front of the Hilton Garden Inn Hotel as illustrated in the following Figures:

- relevant extract of the EIAR Volume 3 Chapter 4 Proposed Scheme Description Part 2 the General Arrangement drawings in Figure 2-1-12.
- the existing aerial view in Figure 2-1-13.
- existing street view in Figure 2-1-14.

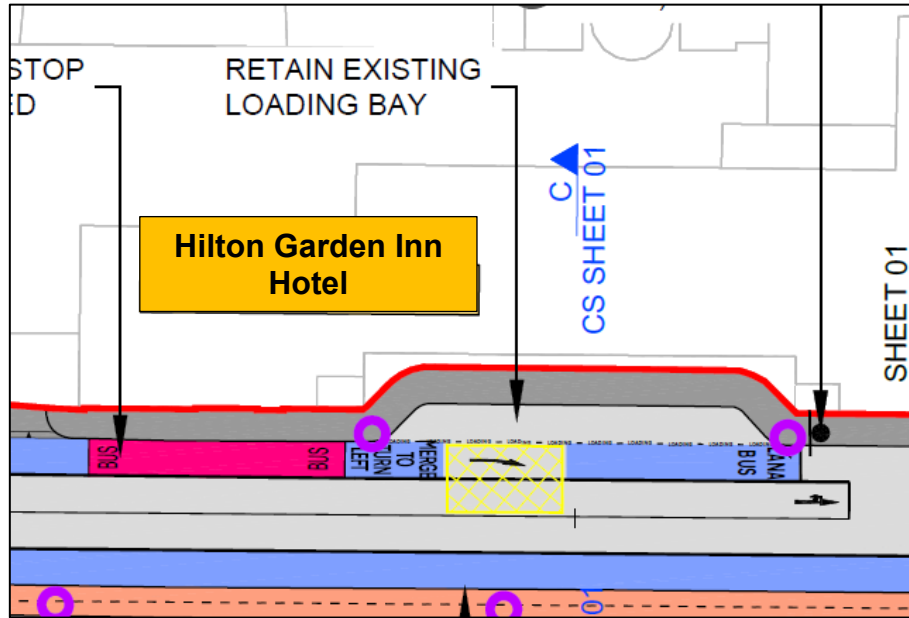


Figure 2-1-12: Extract from General Arrangement Map Sheet 1

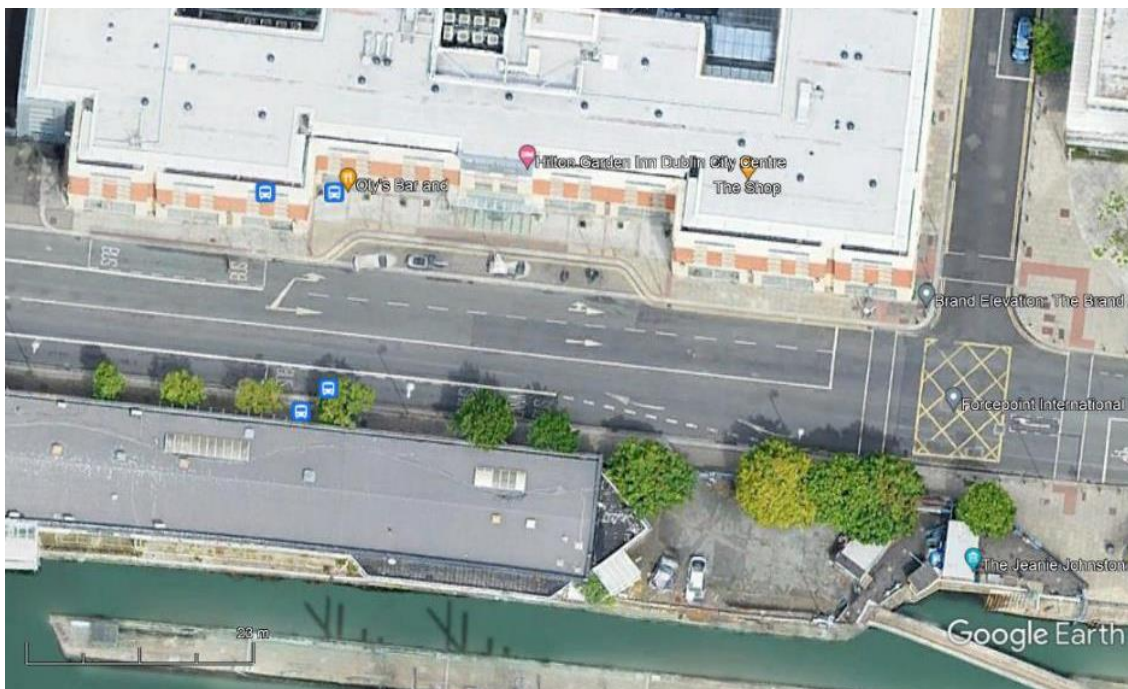


Figure 2-1-13: Aerial View of the Location



Figure 2-1-14: Street View of the Location

Description of the Proposed Scheme at this location

The existing loading bay at the Hilton Garden Inn is located in front of an indent in the hotel frontage where there is a paved footpath area that is 4.5m wide. This footpath area is not part of the public road as it is located behind the property line boundary that existed before the hotel was constructed. Plot No.1007 in the CPO is intended to bring a 3m wide part of the footpath area into public ownership so as to provide a continuous public footpath along the northern side of the street. The remainder of the area in front of the hotel would remain in private ownership. It is proposed to retain the set-down/loading layby as this prevents vehicles from obstructing the bus lane.

Summary of Issue Raised

Seeks confirmation about continued access across footpath and use of set-down layby.

Responses to Issue Raised

The proposed Scheme will not interfere with the existing access arrangements at the hotel, and the set-down/loading layby will be retained.

2.1.3.8 No.1 North Wall Quay at Corner of Commons Street

The submission from NWQ Devco Limited relates to the CPO for the Proposed Scheme at Plot No.1012 in front of No.1 North Wall Quay and on the corner of the junction with Commons Street.

The land take required is shown in the following Figures:

- Extract from CPO Deposit Map Sheet No.10 in Figure 2-1-15 showing the relevant Plot No.1012.
- relevant extract of the EIAR Volume 3 Chapter 4 Proposed Scheme Description Part 2 the General Arrangement drawings in Figure 2-1-16.
- the existing aerial view in Figure 2-1-17.
- existing street view in Figure 2-1-18.

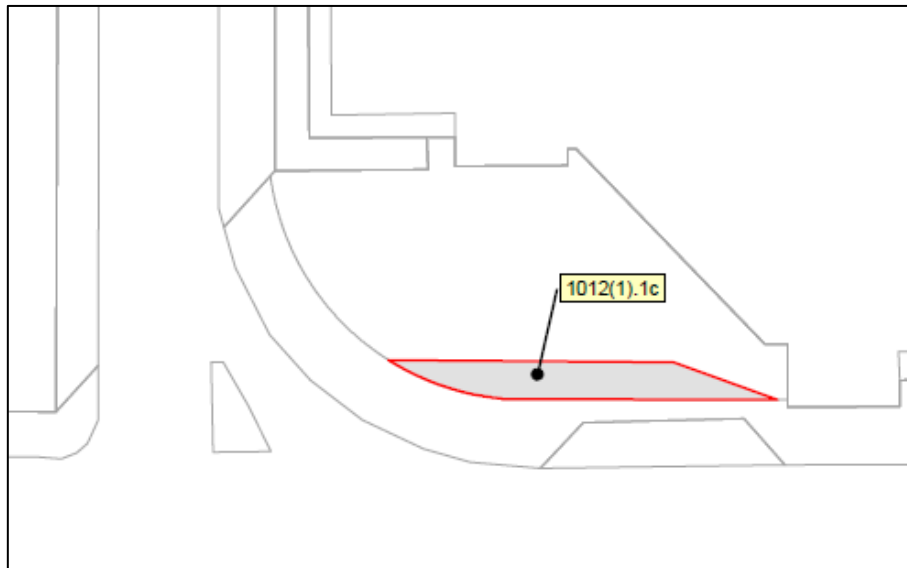


Figure 2-1-15: Extract from CPO Deposit Map Sheet 9

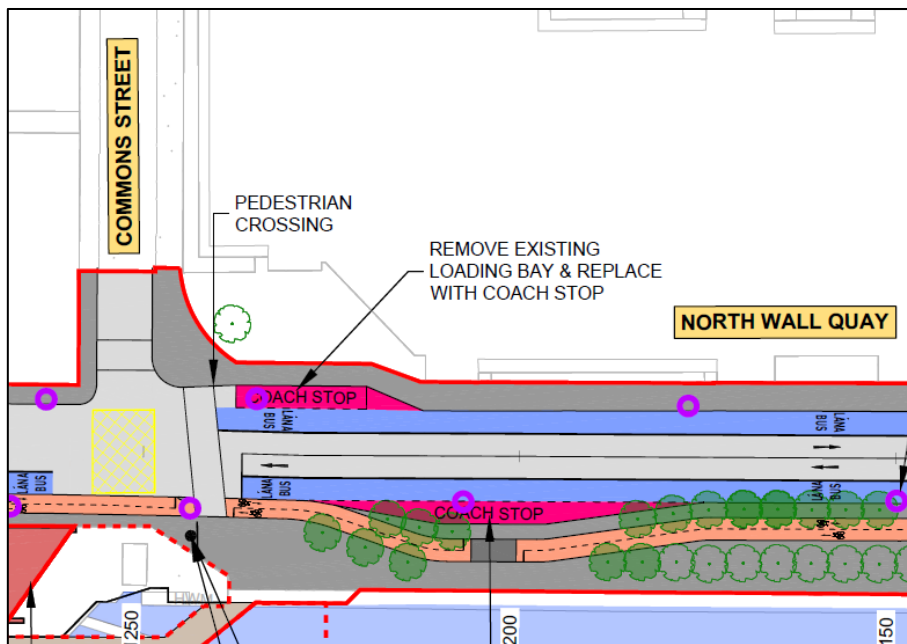


Figure 2-1-16: Extract from General Arrangement Map Sheet 3

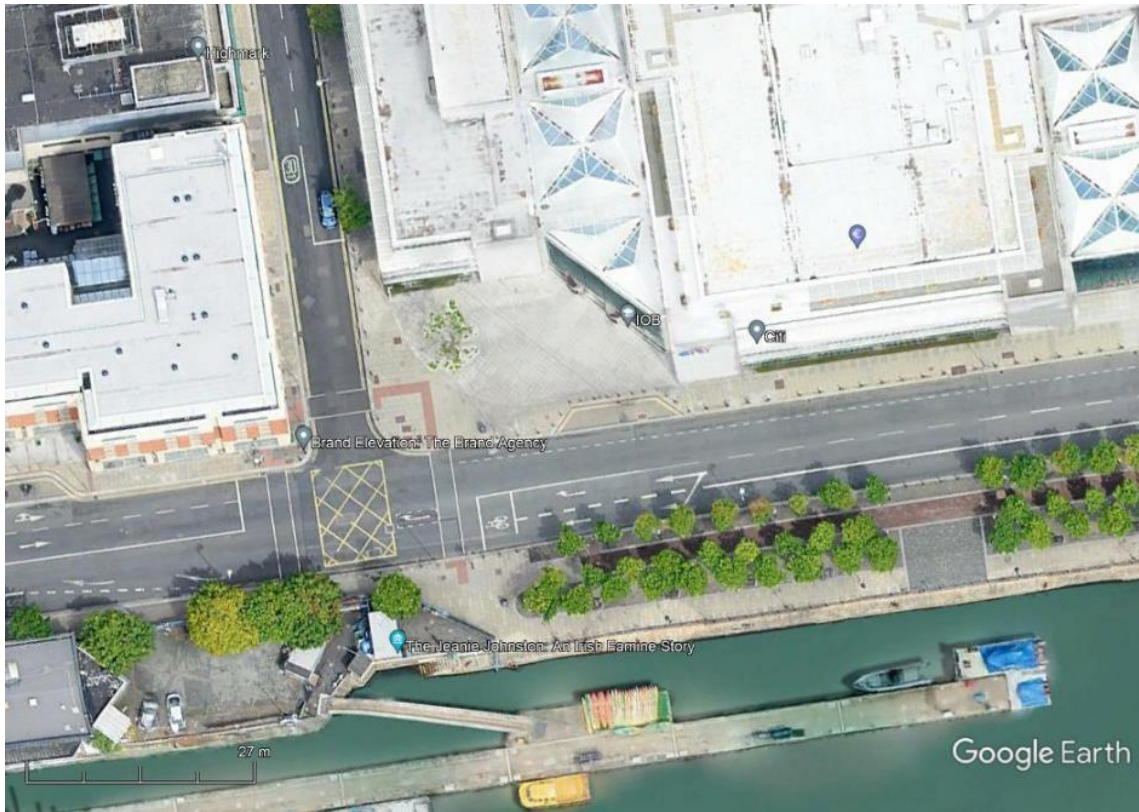


Figure 2-1-17: Aerial View of the Location



Figure 2-1-18: Street View of the Location

Description of the Proposed Scheme at this location

The proposed scheme will replace the existing loading bay on North Wall Quay in front of this property with a longer coach layby to accommodate services such as the Aircoach and Swords Express which would otherwise obstruct the bus lane as their loading times are longer than the normal city buses. At present the footpath around the loading bay area is not part of the public road as it is located behind the property line boundary that existed before the building was constructed. Plot No.1012 in the CPO is intended to bring a 3m wide part of the footpath area into public ownership so as to provide a continuous public footpath along the northern side of the street.

Summary of Issues Raised

The objection to the CPO submitted by Cronin-Sutton Consultants on behalf of the property owner raises the following issue:

- a) The basement extends under the plaza and footpath area and there could be structural impacts for the retaining wall which may not have been designed for heavy vehicle imposed loads.
- b) No need for the coach-stop at this location.
- c) Various comments on the design of the junction at Commons Street.

Responses to Issues Raised

a) Basement

It is not unusual for a private basement to extend under a public footpath, or even a public road. This is common across Dublin, especially in the older Georgian and Victorian areas. In this case the CPO would extend over the surface area only and be limited to a shallow depth of 15cm to include the paving materials, but not the basement roof structure underneath.

Under the applicable structural design codes all underground structures (walls and roofs) must be designed to withstand imposed loads for maintenance vehicles and fire tenders. In addition, a retaining wall beside a public road is legally required to be designed to withstand vehicle loads on the retained earth in front of the wall. The provision of a coach layby in front of this property will therefore not change the context for which the building should have been designed.

b) Need for coach layby

The proposed coach layby is required to accommodate services such as the Aircoach and Swords Express which would otherwise obstruct the bus lane as their loading times are longer than the normal city buses. The proposed scheme includes 2 pairs of such laybys along North Wall Quay.

c) Junction at Commons Street

This junction has been designed to accommodate the proposed coach layby in a balanced arrangement to best meet the overall combined objectives of the proposed core bus corridor scheme and in accordance with the requirements of the Preliminary Design Guidance Booklet included in the Supplementary Information, Preliminary Design Report Appendix O.

2.2 Section 1b: Northern Liffey Quays - East

2.2.1 Description of Proposed Scheme at this Location

As set out in Section 4.5.1 of Chapter 4 in Volume 2 of the EIAR, this section of the Proposed Scheme will commence at the Samuel Beckett Bridge and will proceed eastwards along the north quays and will conclude at the Tom Clarke East Link Bridge.

The historic Scherzer Bridges at the Royal Canal will be relocated to either side of the carriageway to facilitate the addition of bus lanes. Full bus priority is proposed in both directions along the entire length of the north quays. A two-way cycle track will be provided along the southern side of the road throughout the entirety of Section 1b.

Right-turn advance bus lane signals will operate in the eastbound direction at the junction of Park Lane on R801 North Wall Quay.

Temporary land acquisition is required for a Construction Compound at the Scherzer Bridges to facilitate works. These lands will be reinstated in line with existing conditions and / or urban realm improvements (as applicable) following the completion of works.

Extracts from the General Arrangement Drawings, which are provided in Volume 3 of the EIAR, are included below in Figure 2-2-1 to 2-2-3.

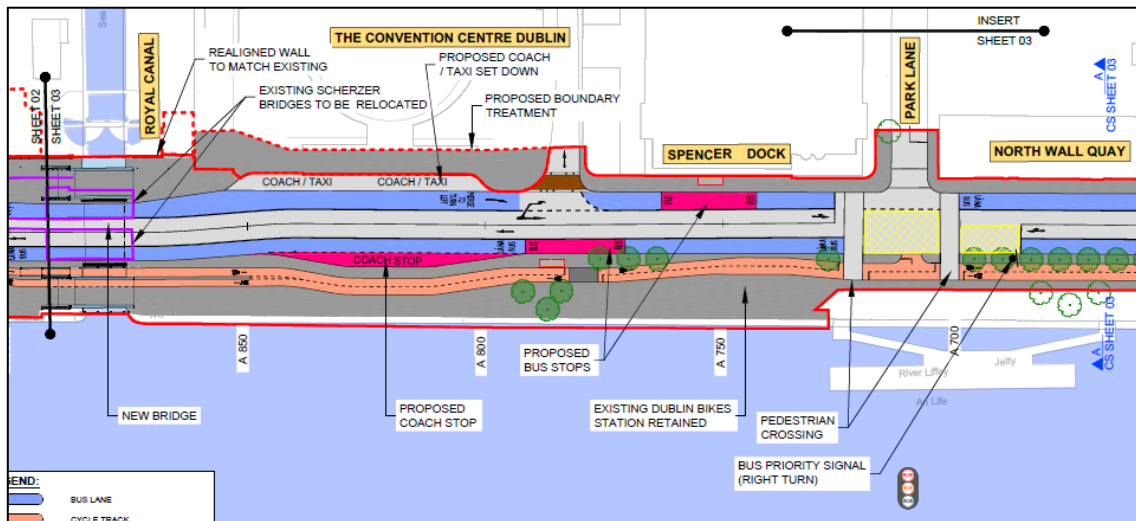


Figure 2-2-1a: Extract from General Arrangement Drawing Sheet 3 Part 1 North

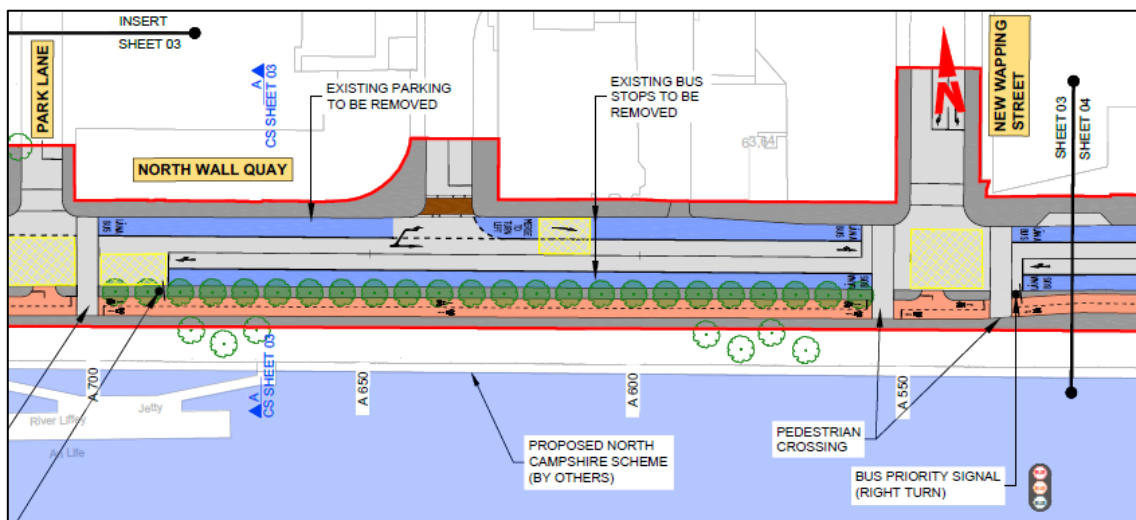


Figure 2-2-1b: Extract from General Arrangement Drawing Sheet 3 Part 2 North

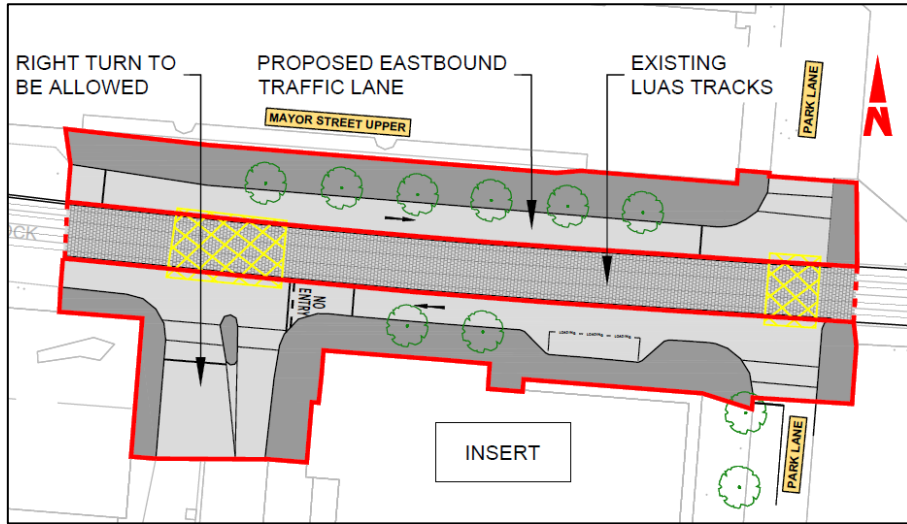


Figure 2-2-1c: Extract from General Arrangement Drawing Sheet 3 Part 3 North

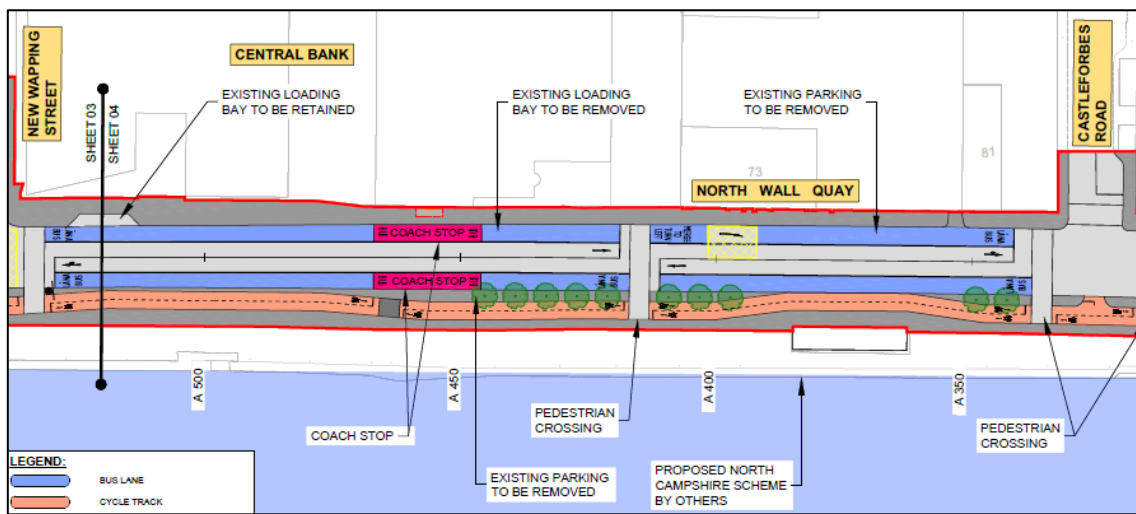


Figure 2-2-2a: Extract from General Arrangement Drawing Sheet 4 Part 1 North

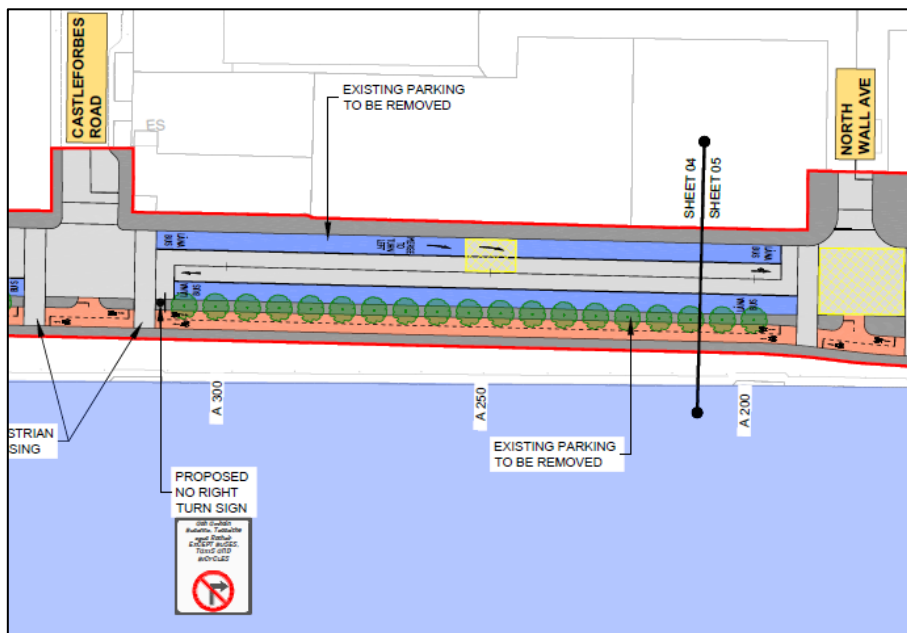


Figure 2-2-2b: Extract from General Arrangement Drawing Sheet 4 Part 2 North

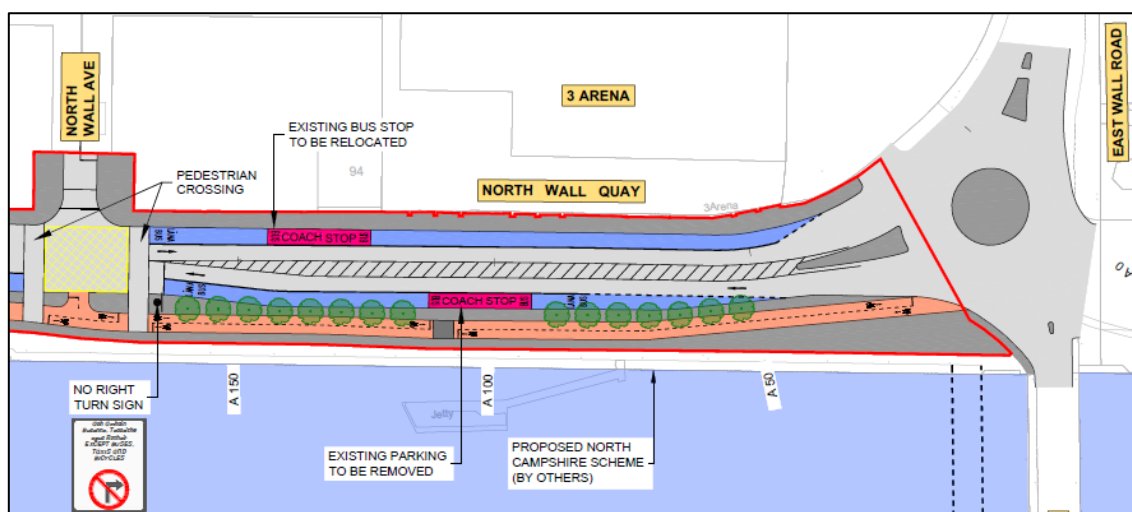


Figure 2-2-3: Extract from General Arrangement Drawing Sheet 5 North

2.2.2 Overview of Submissions Received

Table 2.1 below lists the individual submissions made in respect of the Proposed Scheme in Section 1b Northern Liffey Quays - East.

Table 2.2: Submissions Made in Respect of Section 1b: Northern Liffey Quays - East

No	Name	No	Name	No	Name
1	Amphitheatre Ireland Limited (3-Arena)	10	Dublin Cycling Campaign	22	Transport Infrastructure Ireland
6	Councillor Claire Byrne	21	Spencer Dock Management Ltd.	23	Waterside Block 9 Developments Ltd.

2.2.3 Issues Raised for Section 1b

2.2.3.1 Concerns in relation to access to the 3-Arena

Summary of issue raised:

The following key issues were raised in the submission by John Spain & Associates and Waterman Moylan on behalf of Amphitheatre Ireland Ltd. (3-Arena):

1. Access to 3-Arena small service yard at SW corner of property.
2. Maintenance of access to 3-Arena and its service yards during construction, including from North Wall Avenue.
3. Request for the CBC Contractor to consult with 3-Arena about events and access.
4. Request that Works should cease by 9pm so as not to impede people leaving events. Large numbers of pedestrians for events.
5. HGV Restricted Zone – clarify that Sherriff Street Upper and North Wall Avenue are designated HGV routes. Access for deliveries and waste collection not to be disrupted.
6. Right-turn to be retained into North Wall Avenue for deliveries.
7. Relocate bus stops away from access to 3-Arena service yard on NWQ.

Response to issue raised:

The proposed restriction of several right-turns from North Wall Quay in the westbound direction is described in EIAR Volume 2, Chapter 4 Description of the Proposed Scheme, Section 4.5.1.6 and Table 4.4. This table describes alternative access routes to the areas affected from north via Sherriff Street, as is illustrated on the map in Figure 2-2-4. These turn restrictions are necessary to prevent obstruction of the westbound bus lane so as to fully achieve the public transport objectives of the Proposed Scheme as described in EIAR Volume 2, Chapter 6 Traffic and Transport.



Figure 2-2-4: Local Access Revision to the Docklands Area (from Preliminary Design Report Chapter 12)

Responses to the specific issues raised in the submission by John Spain & Associates and Waterman Moylan on behalf of Amphitheatre Ireland Ltd. (3-Arena) are as follows:

1. The Contractor will be required to liaise with affected businesses, including the 3-Arena throughout construction as set out in EIAR Volume 2 Chapter 5 Construction Section 5.9. Access to the service yards from North Wall Quay and from North Wall Avenue will be maintained throughout construction.
2. The working hours for the proposed development are set out in Section 5.10.3 of the EIAR and are between 07:00hrs and 23:00hrs on weekdays, and between 08:00hrs and 16:30hrs on Saturdays. However, the Contractor will be required to take account of the activities of local businesses and will be responsible for pedestrian safety through the site. Working areas of the site will be cordoned off by hoarding for the safety of pedestrians and operatives.
3. Section 5.8.4.1.1 in Chapter 5 (Construction) in Volume 2 of the EIAR sets out the traffic management measures for general and HGV traffic wanting to access the north quays during the construction phase of the Proposed Scheme.
4. Right turns for general traffic from North Wall Quay are generally being removed as part of the scheme (see Preferred Route Option Report for further details). Access to the 3-Arena Loading Bay on North Wall Avenue will be available via East Wall Road and Sheriff Street Upper as shown in Figure 2-2-5, which is a more detailed blowup from the wider area map in Figure 2-2-4 earlier. It should be note that there is a restriction on heavy goods vehicle traffic in much of the city area to the west and southeast of the 3-Arena, and therefore delivery vehicles will approach from the northeast via East Wall Road, in which case the route via Sherriff Street Upper is shorter than via North Wall Quay. In this regard the Proposed Scheme will have no impact for deliveries to the 3-Arena.
5. The proposed coach stop does not obstruct the access to the 3-Arena Service Yard as shown in Figure 2-2-6.

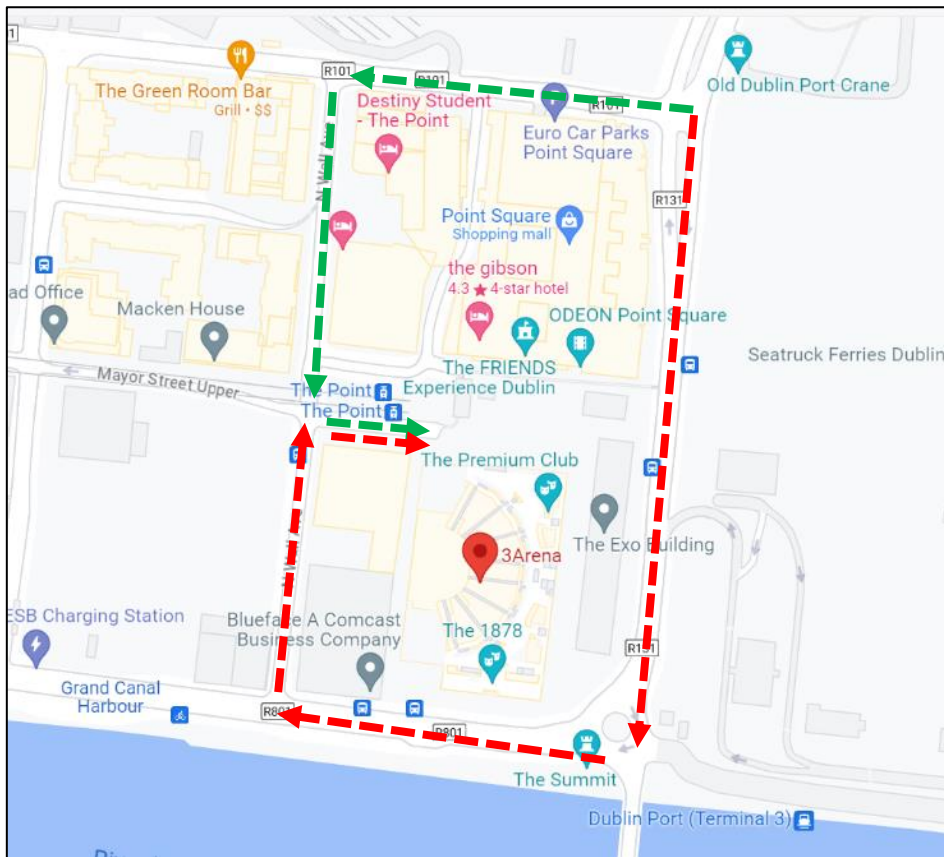


Figure 2-2-5: Access Route for Deliveries to 3-Arena
(Route via North Wall Quay along red arrows / More direct route along green arrows)

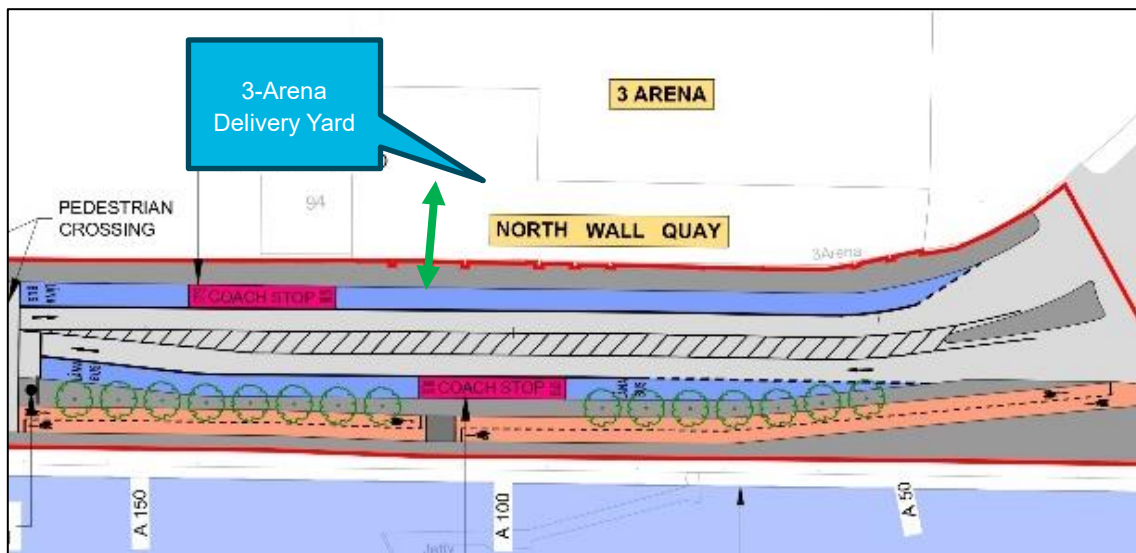


Figure 2-2-6: Proposed Scheme at 3-Arena Delivery Yard with access shown as a green arrow.
(Extract from General Arrangement Drawing Sheet 5 in EIAR Volume 2, Figures, Chapter 4
Proposed Scheme Description, Part 2),

2.2.3.2 Concerns raised by TII in relation to interactions with the Luas Line at Mayor Street

Summary of issues raised:

TII raised concerns in relation to the proposal to introduce an eastbound general traffic lane to the north of the Luas line at Mayor Street. The following specific requests were made:

1. Increased traffic interactions with LUAS tram line on Mayor Street Upper.
2. Proposals insufficiently described or assessed in EIAR.
3. Requests removal of the Mayor Street Upper changes from the scheme.

Responses to issues raised:

The introduction of an eastbound general traffic lane to the north of the LUAS line at Mayor Street Upper is proposed as part of the traffic modification (junction Improvements) proposed for the Guild Street / North Wall Quay / Beckett Bridge junction where it will enable more priority and green signal time to be provided for all sustainable transport modes (pedestrians, cyclists, and buses). That junction is under significant pressure to cater for all modes of transport with the result that waiting times for pedestrians and cyclists are longer than desirable, which results in congestion on the very busy footpaths and cycle tracks. By diverting southbound left-turning on Guild Street to an alternative route, the traffic signal sequence can be simplified with more green time allocated to the east-west core bus corridor, and for the very busy north-south pedestrian and cycle route on the eastern side of Samuel Beckett Bridge and Guild Street. A major cross city cycle route runs through the eastern side of the junction between Guild Street and Samuel Beckett Bridge. There is also a particularly heavy peak pedestrian movement – in large part due to the presence of Spencer Dock train station to the north, and pedestrians arrive in large numbers at this junction leading to crowding. With the southbound traffic left-turn removed, this will allow all north-south modes to move at the same time, rather than in sequence as at present. In the EIAR Volume 4, Chapter 6 Traffic and Transport, Appendix A6.2 Junction Design Report it is shown that another 30% of the signal cycle time will be available to the north-south pedestrian and cyclist movements as a result of the proposed restriction of the southbound left-turn traffic movement. This means that the signals for pedestrians and cyclists can be green for 40% of the cycle time compared to only 10% at present. It will also release more green signal time for the east-west core bus corridor and enable signal-controlled priority to be provided for eastbound buses towards Ringsend and for the city centre orbital O route to turn right onto the Samuel Beckett Bridge.

Traffic diversion routes for the Proposed Scheme are described in the Supplementary Information, Preliminary Design Report (PDR), Chapter 12, Section 12.1.2. For the car parks at Mayor Street Upper, including at the Convention Centre, the existing exit route is shown in Figure 12.3 below.

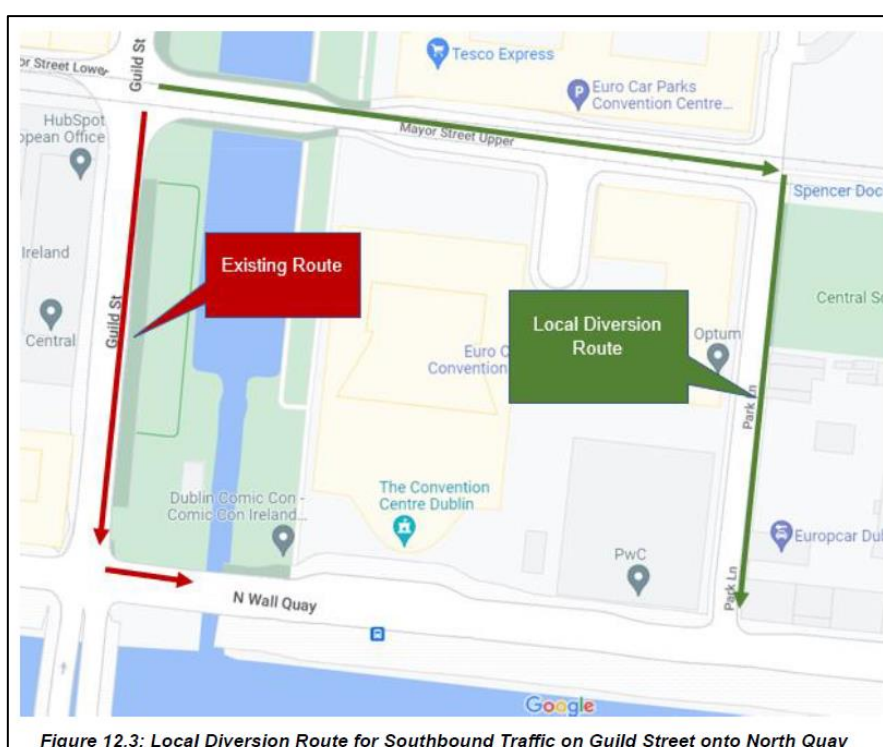


Figure 12.3: Local Diversion Route for Southbound Traffic on Guild Street onto North Quay

The proposal to remove the left turn from Guild Street to North Wall Quay will result in the displacement of a modest volume of traffic (maximum c. 40pcus / hr), which makes this manoeuvre. Most of this traffic can be accommodated via Sheriff Street Upper, however, it creates a problem for a small amount of traffic exiting from two car parks, including the Convention Centre, which must currently only exit left onto Mayor Street, and thence left only onto Guild Street. The effect of the change would therefore be to block the traffic route from the Convention Centre to Dublin Port, Dublin Airport and the Dublin Tunnel. The proposed eastbound general traffic lane to the north of the LUAS line at Mayor Street Upper will permit traffic to exit from the car parks to the right and to access North Wall Quay via Park Lane as shown in Figure 12.3 of the PDR.

The following points are noted in response to TII's observations on the proposal:

1) Traffic interactions with LUAS tram line

The TII submission says the following:

“These proposed alterations to the carriageway on Mayor Street Upper and revised traffic arrangements will interfere not only with the efficiency of the LUAS service due to degraded signal priority in both directions, but also the safety of LUAS operations due to an increase in conflicting movements.”

The traffic interactions with the LUAS trams will occur at two existing signalised junctions, at the Convention Centre Car Park Entrance and at Park Lane, as shown in Figure 2-2-1c (repeated below), which are to be controlled by traffic signals, which ensures full safety with priority for the LUAS.

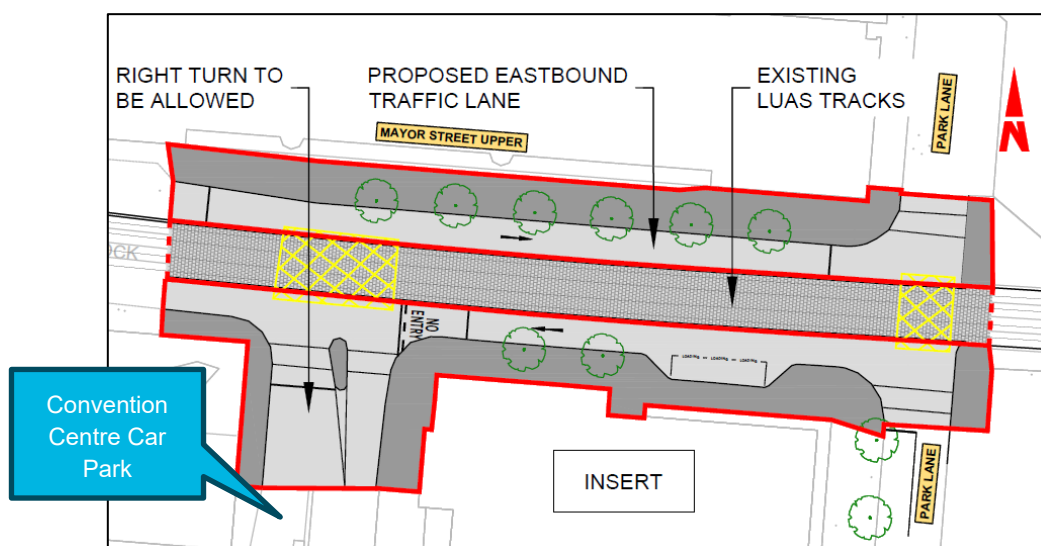


Figure 2-2-1c: Extract from General Arrangement Drawing Sheet 3 Part 3 North (repeated from earlier)

There will be a small volume of additional traffic crossing the tram tracks from the car parks on the southern side of Mayor Street when the right-turn exit is permitted. As these are some of the quietest junctions along the LUAS Red Line, there will be no impact for tram priority or safety. In EIAR Volume 2 Chapter 6 Traffic and Transport, Section 6.4.6.3.8.5, Table 6.50 (shown in the next image) provides an assessment of each junction affected by the Proposed Scheme and lists the impact at the junction of Mayor Street Upper and Park Lane as Negligible and Not Significant.

The EIAR has fully assessed and described the proposal. EIAR Volume 2, Chapter 6 Traffic and Transport, Section 6.4.6.3.8.5, Table 6.50 (PM peak) identifies the impacts on the junctions along Mayor Street as either Not Significant or Imperceptible. Therefore, the changes in traffic volumes have little or no environmental impact and require a commensurate level of assessment.

Table 6.50: Volume over Capacity Ratios at Key Junctions (Do Minimum vs. Do Something), PM Peak, 2028 Opening Year

Road Name	Road Sensitivity	Junction Name	DM Max V / C Ratio			DS Max V / C Ratio			Description of Impact	Significance of Effects
			<85%	85% - 100%	>100%	<85%	85% - 100%	>100%		
Custom House Quay	Low	Eden Quay / Beresford Place / Custom House Quay / Butt Bridge	✓			✓			Negligible	Not Significant
Beresford Place	Low	Beresford Place / Custom House	✓			✓			Negligible	Not Significant
		Old Abbey Street / Beresford Place	✓			✓			Negligible	Not Significant
		Abbey Street Lower / Beresford Place		✓			✓		Negligible	Not Significant
Gardiner Street Lower	Low	Gardiner Street Lower / Beresford Place	✓			✓			Negligible	Not Significant
Seville Place	Negligible	Seville Place / Oriel Street Lower / Oriel Street Upper	✓			✓			Negligible	Imperceptible
		Seville Place	✓			✓			Negligible	Imperceptible
Guild Street	Negligible	Seville Place / Sheriff Street Upper / Guild Street	✓			✓			Negligible	Imperceptible
		Mayor Street Lower / Guild Street / Mayor Street Upper		✓			✓		Negligible	Imperceptible
Mayor Street Upper	High	Mayor Street Upper	✓			✓			Negligible	Not Significant
Park Lane	High	Mayor Street Upper / Park Lane	✓			✓			Negligible	Not Significant

Extract from EIAR Volume 2, Chapter 6 Traffic & Transport

A Road Safety Audit of the Proposed Scheme is included in the Supplementary Information, Preliminary Design Report, Appendix M2, and this did not indicate any concerns with the proposals to modify the traffic layout on Mayor Street Upper to accommodate eastbound vehicular traffic adjacent to the LUAS Line, with associated right-turn crossing movements over the tram tracks at the two existing signalised junctions.

In conclusion the concerns of TII are not supported by the available evidence:

- Signal priority for trams will remain unchanged, and therefore the efficiency of the LUAS operations cannot be adversely affected.
- The very small increase in local traffic crossing movements of the tram tracks will occur under signal control in complete safety, especially as these will be very slow turning movements with negligible risk of red signal running as may occur on major through traffic routes. The independent Road Safety Audit raised no concerns in this regard.

2) Proposals insufficiently described or assessed in EIAR.

The proposed traffic turning restrictions at the major junction of Guild Street, North Wall Quay, and Samuel Beckett Bridge, including a ban of all left-turns apart from northbound, are described in EIAR Volume 2, Chapter 4 Proposed Scheme Description, Section 4.5.1.6 in Table 4.4.

The proposed modification for traffic movements at Mayor Steet Upper is described in EIAR Volume 2, Chapter 4 Proposed Scheme Description, Section 4.2 as follows:

“The Proposed Scheme includes a local modification to Mayor Street at Spencer Dock. In order to accommodate proposed turning movement restrictions at the Guild Street / Samuel Beckett Bridge junction for the purposes of provided enhanced bus, cycle and pedestrian priority, it is proposed to open an eastbound traffic lane north of the LUAS between the National Convention Centre Car Park and Park Lane. This will facilitate traffic exiting the car park towards the M50 Port Tunnel.”

Assessment of the impacts of these proposals is included in EIAR Volume 2, Chapter 6 Traffic and Transport, Section 6.4.6.3.8.5, Table 6.50 that provides an assessment of each junction affected by the Proposed Scheme and lists the impact at the junction of Mayor Street Upper and Park Lane as Negligible and Not Significant.

EIAR Volume 4, Chapter 6 Traffic and Transport, Appendix A6.2 Junction Design Report (JDR) shows that at the major junction of Guild Street, North Wall Quay, and Samuel Beckett Bridge another 30% of the signal cycle time will be available to the north-south pedestrian and cyclist movements as a result of the proposed restriction of the southbound left-turn traffic movement. The JDR analysis demonstrated the general benefits for the Proposed Core Bus Corridor Scheme of the proposed adjustments to the operation of this major junction on North Wall Quay, which will derive much of overall benefits of the Proposed Scheme for Public Transport as reported in EIAR Volume 2, Chapter 6 Traffic and Transport.

The proposals are therefore sufficiently described and assessed in EIAR.

3) Request to remove the Mayor Street Upper changes from the scheme.

For the reasons outlined above, it is inappropriate to omit the proposed eastbound traffic lane on Mayor Street from the proposed scheme as they are essential to the proposed improvements for pedestrians, cyclists and public transport at the major junction of Guild Street, North Wall Quay, and Samuel Beckett Bridge.

2.2.3.3 Concerns in relation to impacts on City Block 9

Summary of issue raised:

Waterside Block 9 Ltd. raised concerns in relation to the proposed removal of parking and loading facilities on North Wall Quay.

Responses to issues raised:

EIAR Volume 2, Chapter 6 Traffic and Transport addresses the parking in this location as follows:

“There are currently twelve parking spaces adjacent to the eastbound lane of R801 North Wall Quay, to the east of the junction between R801 North Wall Quay and Castleforbes Road. Of which, eight are designated paid parking spaces, two are disabled permit parking spaces and two are loading bays. It is proposed that all twelve parking spaces are removed to enable the provision of a continuous eastbound bus lane. Due to the surrounding paid off-street parking (at Euro Car Parks Convention Centre and Euro Car Parks Point Square) and the nearby 20 parking spaces along the adjacent North Wall Avenue, the overall impact of this change is considered to have a Negative, Slight and Long-term effect;”

2.2.3.4 Request to maintain Scherzer Bridges at Spencer Dock in situ.

Summary of issue raised:

Councillor Claire Byrne submitted that the historic Scherzer Bridges at Spencer Dock on the Royal Canal should be maintained in-situ.

Responses to issues raised:

Refer to Section 2.1.3.6 for the response to the same issue in relation to the Scherzer Bridges at George's Dock.

2.2.3.5 Omission of Works at Tom Clarke East Link Bridge from Scheme

Summary of issue raised:

The submission from Dublin Cycling Campaign expressed disappointment that various works at the Tom Clarke East Link Bridge are omitted from the scheme, including the Point Roundabout Upgrade and the proposed Point Footbridge

Responses to issues raised:

The Tom Clarke East Link Bridge and the Point Roundabout are outside the red line for the proposed scheme. These schemes are being separately progressed by Dublin City Council but are at an earlier

stage of development. The NTA is aware of these adjacent proposed schemes from ongoing liaison with Dublin City Council, which will continue in future as the Proposed Scheme is progressed. The Proposed Scheme is compatible with these other future schemes.

2.3 Section 1c: Southern Liffey Quays – West

2.3.1 Description of Proposed Scheme at this Location

As set out in Section 4.5.1 of Chapter 4 in Volume 2 of the EIAR, this Section of the Proposed Scheme will commence at the Talbot Memorial Bridge and will proceed eastwards along the south quays and will conclude on the southern end of the Samuel Beckett Bridge.

Bus priority is proposed westbound only along this section, as eastbound buses will use the north quays as far as Samuel Beckett Bridge. The existing two-way cycle track on the north side of the road is being retained throughout this section of the works.

Extracts from the General Arrangement Drawings, which are provided in Volume 3 of the EIAR, are included below in Figure 2-3-1 to 2.3.2.

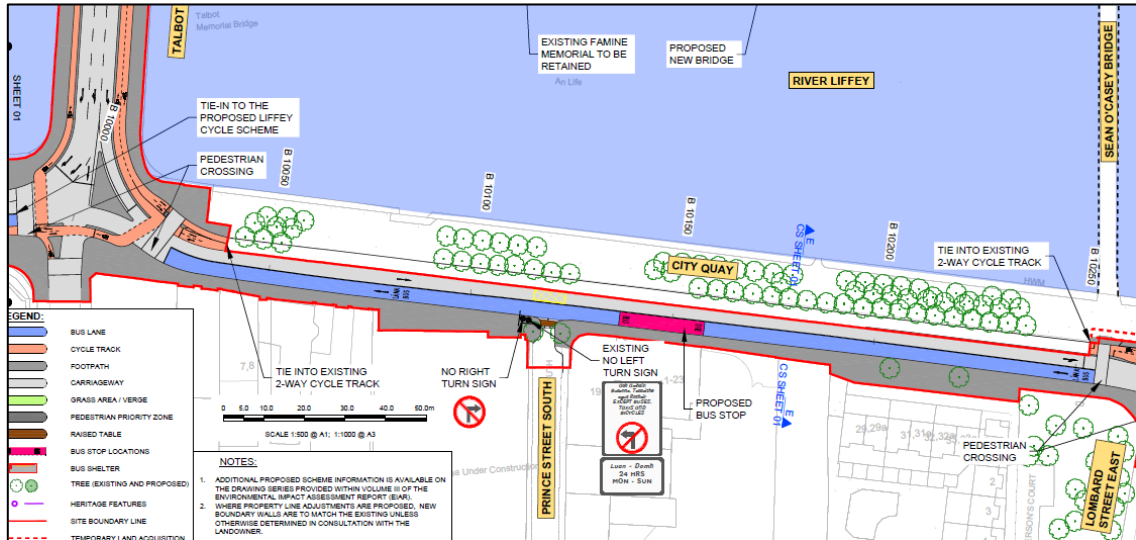


Figure 2-3-1a: Extract from General Arrangement Drawing Sheet 1 Part 1 South

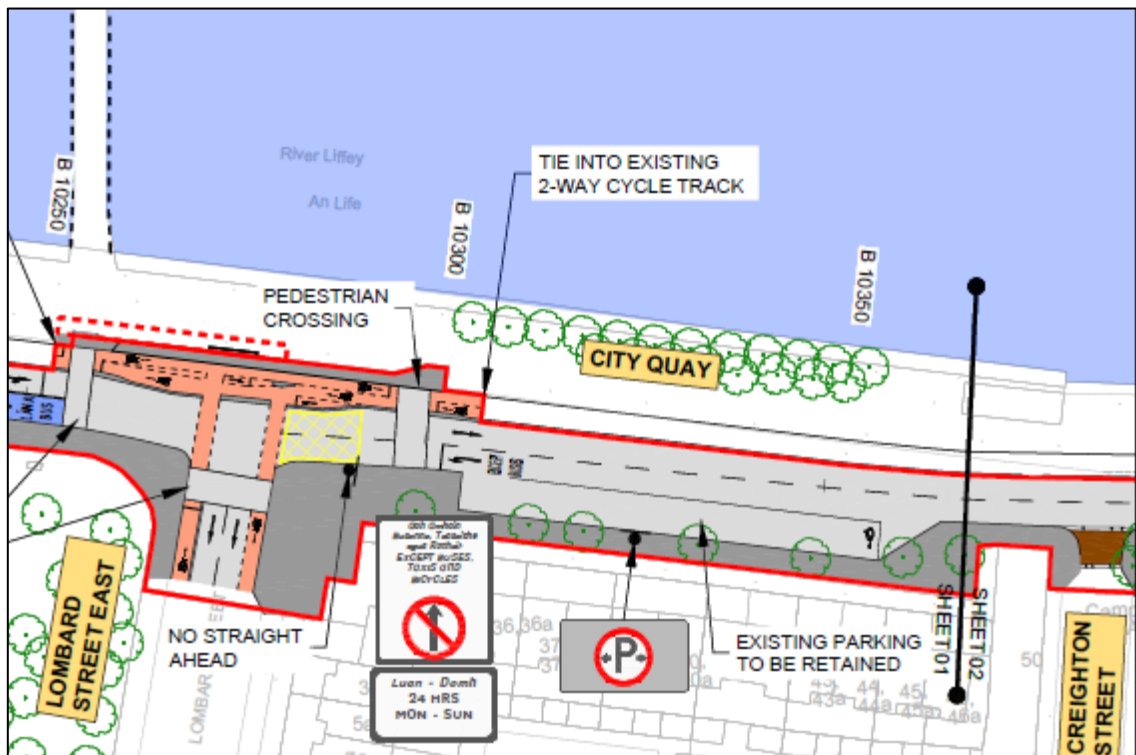


Figure 2-3-1b: Extract from General Arrangement Drawing Sheet 1 Part 2 South

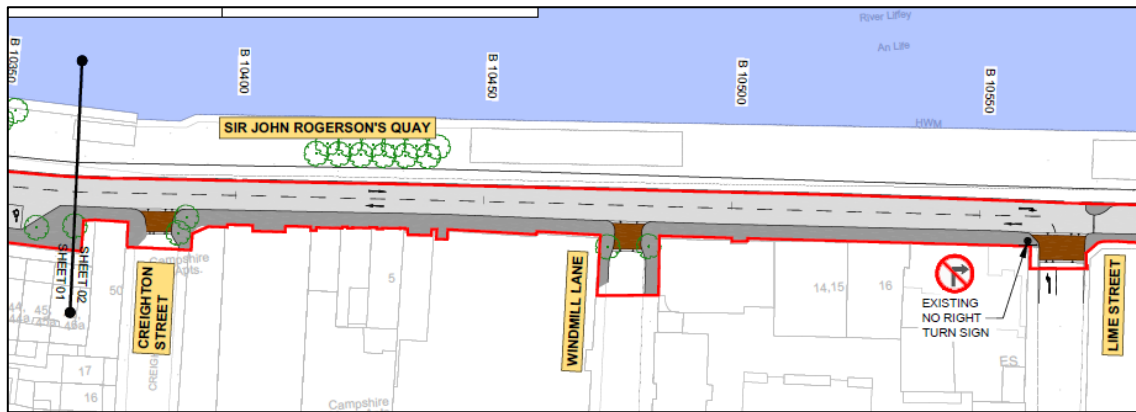


Figure 2-3-2a: Extract from General Arrangement Drawing Sheet 2 Part 1 South

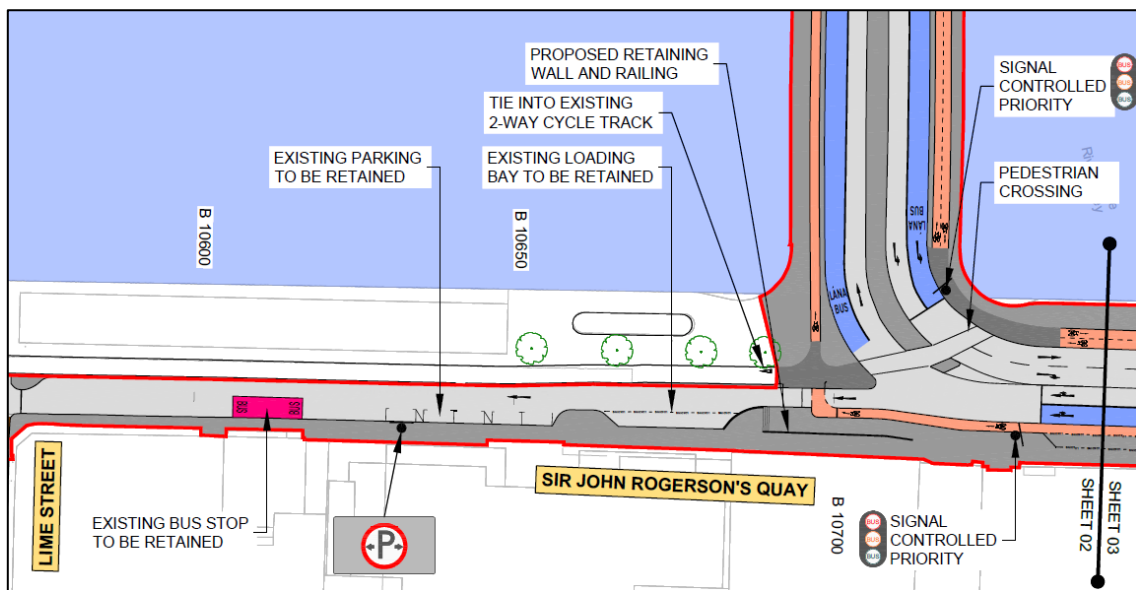


Figure 2-3-2b: Extract from General Arrangement Drawing Sheet 2 Part 2 South

2.3.2 Overview of Submissions Received

Table 2.1 below lists the individual submissions made in respect of the Proposed Scheme in Section 1c Southern Liffey Quays – West.

Table 2.3: Submissions Made in Respect of Section 1c: Southern Liffey Quays – West

No	Name	No	Name	No	Name
9	Dublin City Council				

2.3.3 Issues Raised for Section 1c

2.3.3.1 Pedestrian Crossing at Sir John Rogerson's Quay

Summary of issue raised:

The DCC submission requests that a pedestrian crossing be provided on the eastern side of the junction at the southern end of the Samuel Beckett Bridge on the western side across Sir. John Rogerson's Quay.

Response to of issue raised:

Refer to Section 2.9 response to DCC Roads Division (Item 2.4.2.3).

2.4 Section 1d: Southern Liffey Quays – East

2.4.1 Description of Proposed Scheme at this Location

As set out in Section 4.5.1 of Chapter 4 in Volume 2 of the EIAR, this Section of the Proposed Scheme commences at the Samuel Beckett Bridge and will proceed eastwards along the south quays and concludes at the eastern end of Sir John Rogerson's Quay.

Bus priority will be achieved through the implementation of a short sections of bus lane westbound, operating effectively as a bus gate at Forbes Street for the approach to the junction at Cardiff Lane. Bus priority is not required eastbound, since there will be no access for general traffic across the Dodder Public Transport Bridge, and therefore no cause for congestion. The existing cycle track will be widened and upgraded to a two-way facility.

Temporary land acquisition is required for a Construction Compound at Sir John Rogerson's Quay to facilitate works. These lands will be reinstated in line with existing conditions and / or urban realm improvements (as applicable) following the completion of works. Extracts from the General Arrangement Drawings, which are provided in Volume 3 of the EIAR, are included below in Figure 2-4-1 to 2-4-3.

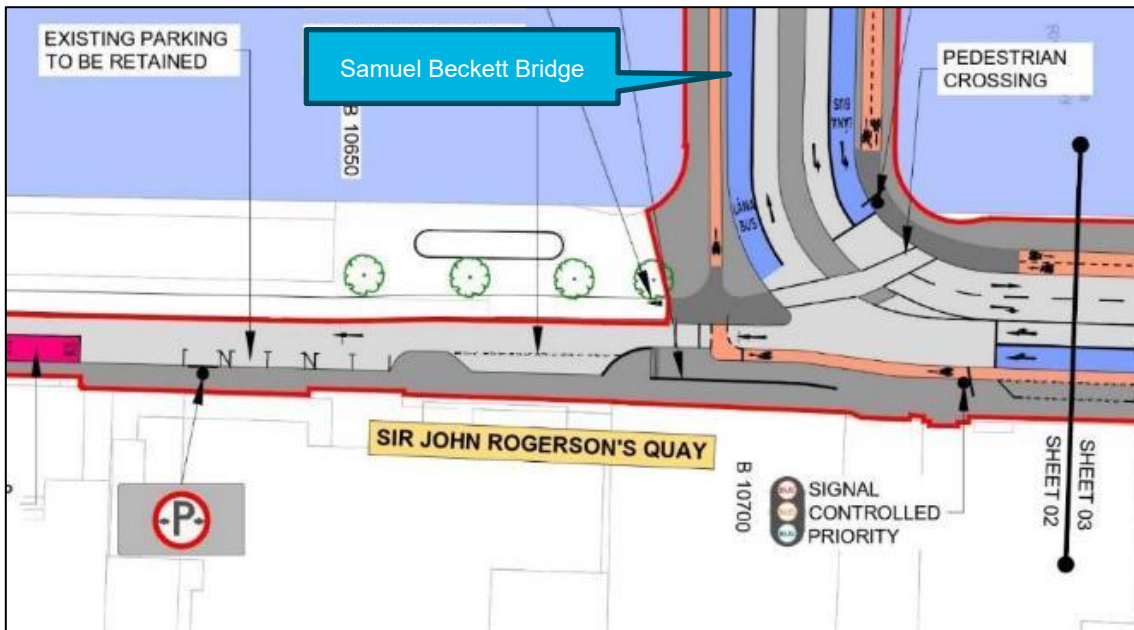


Figure 2-4-1: Extract from General Arrangement Drawing Sheet 2 South

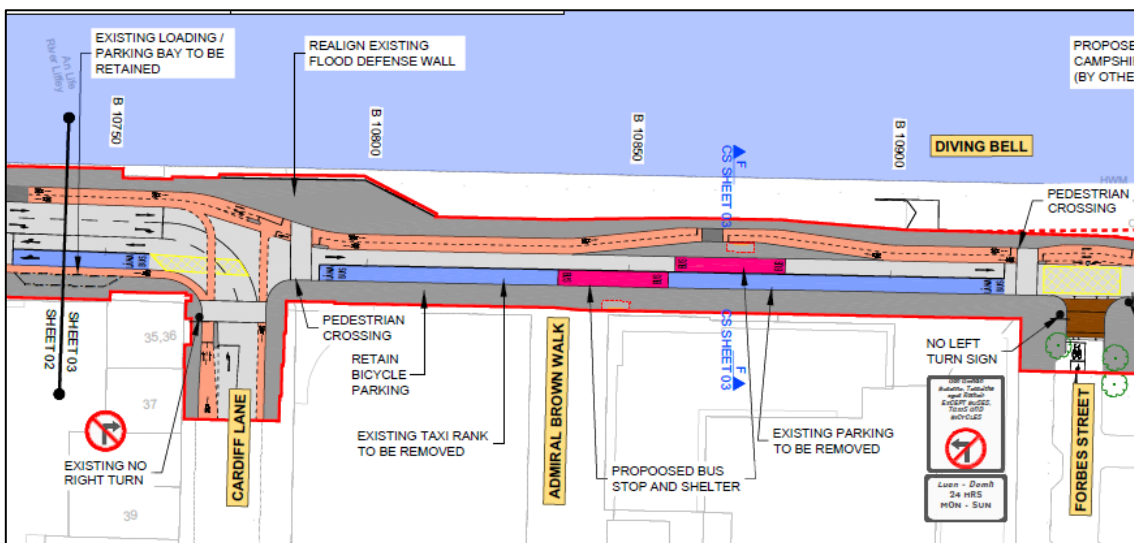


Figure 2-4-2a: Extract from General Arrangement Drawing Sheet 3 Part 1 South

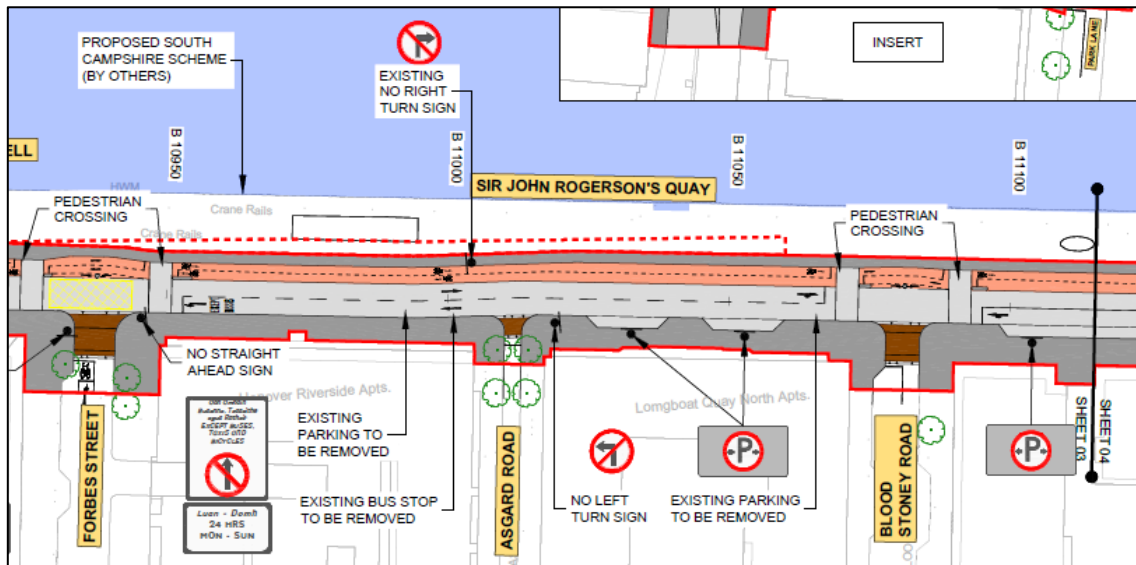


Figure 2-4-2b: Extract from General Arrangement Drawing Sheet 3 Part 2 South

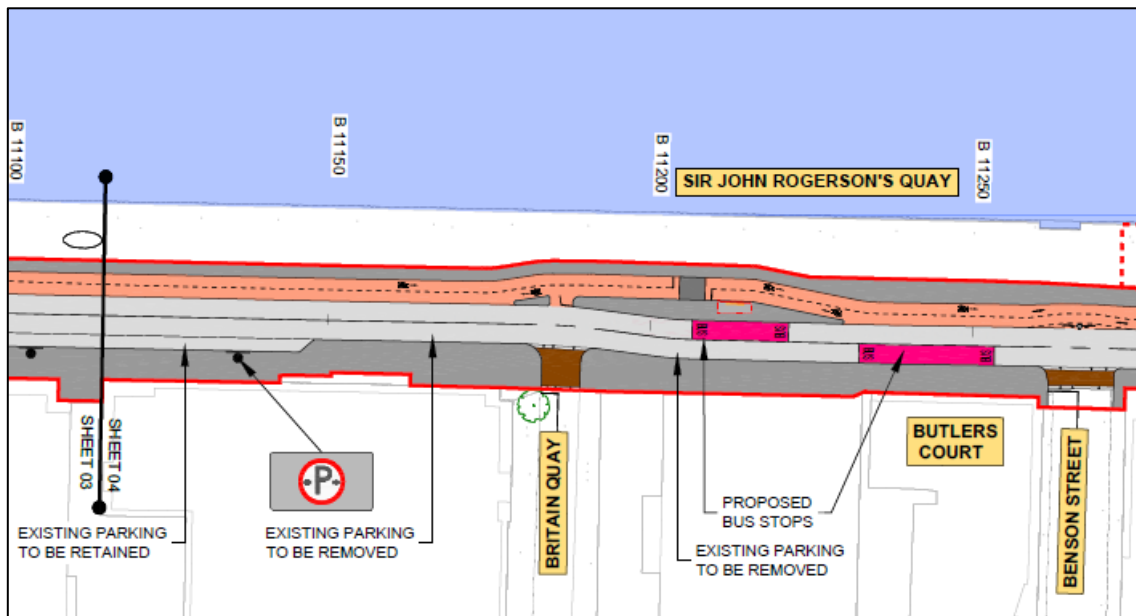


Figure 2-4-3a: Extract from General Arrangement Drawing Sheet 4 Part 1 South

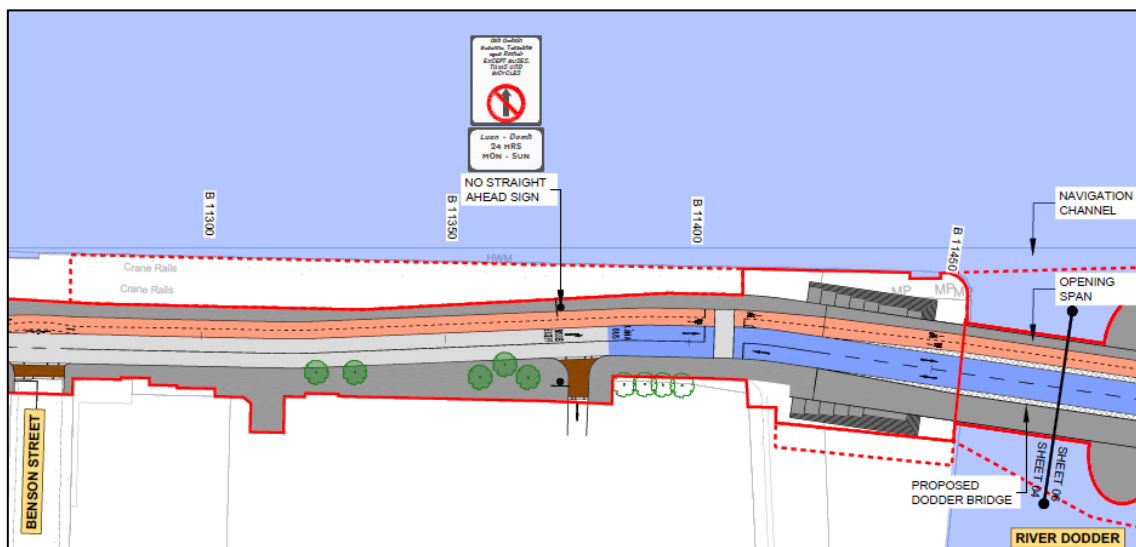


Figure 2-4-3b: Extract from General Arrangement Drawing Sheet 4 Part 1 South

2.4.2 Overview of Submissions Received

Table 2.1 below lists the individual submissions made in respect of the Proposed Scheme in Section 1d Southern Liffey Quays – East.

Table 2.4: Submissions Made in Respect of Section 1d: Southern Liffey Quays – East

No	Name	No	Name	No	Name
6	Councillor Claire Byrne	10	Dublin Cycling Campaign	12	Ivana Bacik TD

2.4.3 Issues Raised for Section 1d

2.4.3.1 *Pedestrian and cycling facilities at southeast corner of Samuel Beckett Bridge*

Summary of issue raised:

Various submissions have highlighted the constrained pedestrian and cycle space at the southeast corner of Samuel Beckett Bridge.

Responses to issues raised:

Figure 2-4-4 shows the Proposed Scheme at the southern end of the Samuel Beckett Bridge (From EIAR Volume 3 Figures, Chapter 4 Description of Proposed Scheme, Part 2, General Arrangement Drawings Sheets 2 and 3). It is proposed, as part of the scheme, to widen the pedestrian / cycle zone on the southeast approach to the bridge by 2m by removing the median, realigning the roadway to the south and narrowing the lanes as far as practicable. While various suggestions have proposed removing lanes, this is not practicable while maintaining essential bus priority, including provision for future orbital services and the eastbound bus route towards Ringsend. The proposed widening will lead to a significant improvement in conditions for pedestrians and cyclists over most of this area, and it will reduce the narrowest section to a very short length. There is a very short, shared area on the corner of the bridge, which it is not possible to widen without removing the southbound bus lane from the bridge and disturbing the major bridge movement joint that enables the bridge to swing open for river navigation. Chapter 6 (Traffic & Transport) in Volume 2 of the EIAR provides further detail on the consideration and assessment of the potential effects of the Proposed Scheme's proposals at this junction in respect to different users, such as pedestrians, cyclists, bus and general traffic. In EIAR Volume 4 Appendices, Chapter 6 Traffic and Transport, Appendix A6.4.1 Pedestrian Infrastructure Assessment indicates that the Level of Service for pedestrians at the southern end of the Samuel Beckett Bridge will increase from C to B.

2.5 Section 2: River Dodder Public Transport Opening Bridge

2.5.1 Description of Proposed Scheme at this Location

As set out in Section 4.5.2 of Chapter 4 in Volume 2 of the EIAR, this section of the Proposed Scheme comprises the Dodder Public Transport Opening Bridge (DPTOB), which will be constructed across the mouth of the River Dodder, at its confluence with the River Liffey, to connect Sir John Rogerson's Quay to East Link Road and York Road. The proposed DPTOB will include:

- The construction of approach roads associated with the bridge;
- A new control building for operating the bridge;
- A new club house and facilities for St. Patrick's Rowing Club which will be required to be moved as a result of the Proposed Scheme;
- The provision of a new ESB substation;
- The reclamation of land to the west of Tom Clarke East Link Bridge to facilitate construction works; and
- Landscaping of the area between York Road / Thorncastle Street and the R131 Regional Road over the extent of this Section of the Proposed Scheme.

The purpose of the DPTOB is to facilitate public transport only and therefore only bus lanes are accommodated on the bridge. A two-way segregated cycleway is proposed alongside the eastbound carriageway on the north side of the bridge.

An extract from the General Arrangement Drawings, which are provided in Volume 3 of the EIAR, is included below in Figure 2-5-1.



Figure 2-5-1: Extract from General Arrangement Drawing Sheet 5

2.5.2 Overview of Submissions Received

Table 2.1 below lists the individual submissions made in respect of the Proposed Scheme in Section 2 River Dodder Public Transport Opening Bridge.

Table 2.2: Submissions Made in Respect of Section 2: River Dodder Public Transport Opening Bridge

No	Name	No	Name	No	Name
6	Cllr Claire Byrne	12	Ivana Bacik TD	10	Dublin Cycling Campaign
11	Hibernia Real Estate Group Limited				

2.5.3 Issues Raised for Section 2

2.5.3.1 Visual prominence of the new rowing club building as seen from Portview House.

Summary of issue raised:

The submission from Hibernia Real Estate Group, while strongly supporting the scheme, raised concern about the visual prominence of the proposed new rowing club building as seen from Portview House. The submission requested a reduction in the height of the pitched roof pitch.

Response to issue raised:

Within the proposed replacement rowing club building, the function room and the gymnasium each occupy a third of the first floor, separated by a service core with stairs, lift, toilets, lobby and kitchen all taking up the middle third of the floor plan. A higher roof was required over all these areas for the following reasons;

- There was a requirement to suspend a historically important rowing scull from the ceiling of the function room, well above head level, (as is currently the case in the existing Rowing Club building), therefore requiring a high ceiling. The large footprint, high occupancy numbers and relative importance of this room also dictated a generous ceiling height.
- The gymnasium required a high floor to ceiling dimension to facilitate specialist exercise equipment and to assist with ventilation and air movement in the room.
- Plant, water tanks and lift overrun are located in a large accessible roof space directly above the service core, requiring a large roof void.

The design of the proposed new rowing club building is appropriate for the intended purpose of the replacement building. Elevations for the proposed building are shown in EIAR Volume 3 Figures, Chapter 4 Proposed Scheme Description, Part 18 Structures in drawing No.BCID-SHA-STR_ZZ-0016_XX_00-DR-SS-0003.

EIAR Volume 2, Chapter 17 Landscape (Townscape) & Visual, Section 17.4.4.4 provides an assessment of the potential visual impacts of the Proposed Scheme in Table 17.8. The assessment concludes for the River Dodder Public Transport Opening Bridge in Table 7.10 that the visual impact will be Neutral, Very Significant and Short Term at 1 year after construction, and Neutral, Significant and Short Term at 15 years after construction. This assessment took account of all elements of the Proposed Scheme at that location, including the proposed new clubhouse building for the rowing club. A photomontage of the proposed clubhouse is provided in EIAR Volume 3, Figures, Chapter 17 Landscape (Townscape) & Visual, View 12 as shown below in Figure 2-5-2. Portview House is visible behind the proposed rowing club building as annotated on the image.



Figure 2-5-2: Photomontage of Proposed Rowing Club Building

2.5.3.2 Support for the Dodder Public Transport Bridge

Summary of issue raised

Various submissions expressed support for the provision of the Dodder Public Transport Bridge, including those of Cllr Claire Byrne, Dublin Cycling Campaign and Ivana Bacik TD.

Response to issue raised

The support for the scheme is noted and welcomed.

2.6 Section 3: Ringsend & Irishtown

2.6.1 Description of Proposed Scheme at this Location

As set out in Section 4.5.3 of Chapter 4 in Volume 2 of the EIAR, this section of the Proposed Scheme will commence from the southern end of the Tom Clarke East Link Bridge at the junction with the proposed DPTOB and will proceed to the junction of R131 Sean Moore Road and R802 Beach Road.

No new or upgraded bus facilities will be provided in this section of the Proposed Scheme as it is intended that buses will use the existing facilities along the East Link Road to R131 Sean Moore Road. The provision of new and upgraded cycling facilities are the main works of concern in this section of the Proposed Scheme.

This section of the Proposed Scheme will comprise the following works along several cycle routes:

- From the southern end of the Tom Clarke East Link Bridge at the junction of the proposed DPTOB, a two way cycle track will extend for 100m to York Road.
- From York Road the cycle route will follow quiet local streets at Pembroke Cottages and Cambridge Park to Ringsend Park, where the existing footpath along the western boundary of the park will be improved to a 4m wide shared path with pedestrian priority;
- From the southern end of Ringsend Park, a segregated cycle track will be provided along Strand Street, Pembroke Street, and R802 Beach Road to R131 Sean Moore Road;
- A branch cycle route from the southern end of Ringsend Park will skirt around Irishtown Stadium to provide a direct connection to the Poolbeg SDZ lands via Bremen Road; and
- A branch cycle route will share the quiet residential streets along York Road and Pigeon House Road to Poolbeg, where Quiet Street Treatment will be provided (in addition to the existing traffic calming measures that are already provided).

The proposed works along the aforementioned routes will facilitate improvements in the provision cycling facilities along a number of Greater Dublin Area Cycle Network Plan designated cycle routes, primarily the secondary routes of 1E/N05, 13E/N05, C8 and the Royal Canal and Dodder Greenways.

Extracts from the General Arrangement Drawings, which are provided in Volume 3 of the EIAR, are included below in Figure 2-6-1 to 2-6-7.



Figure 2-6-1: Extract from General Arrangement Drawing Sheet 6



Figure 2-6-2: Extract from General Arrangement Drawing Sheet 7

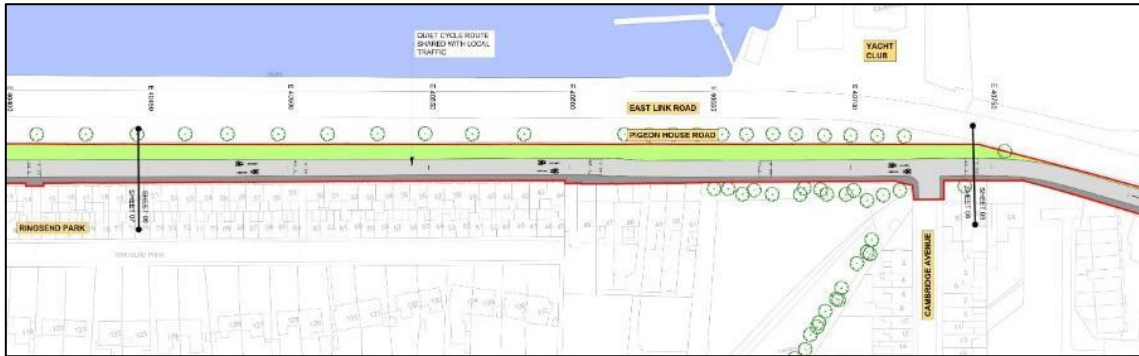


Figure 2-6-3: Extract from General Arrangement Drawing Sheet 8

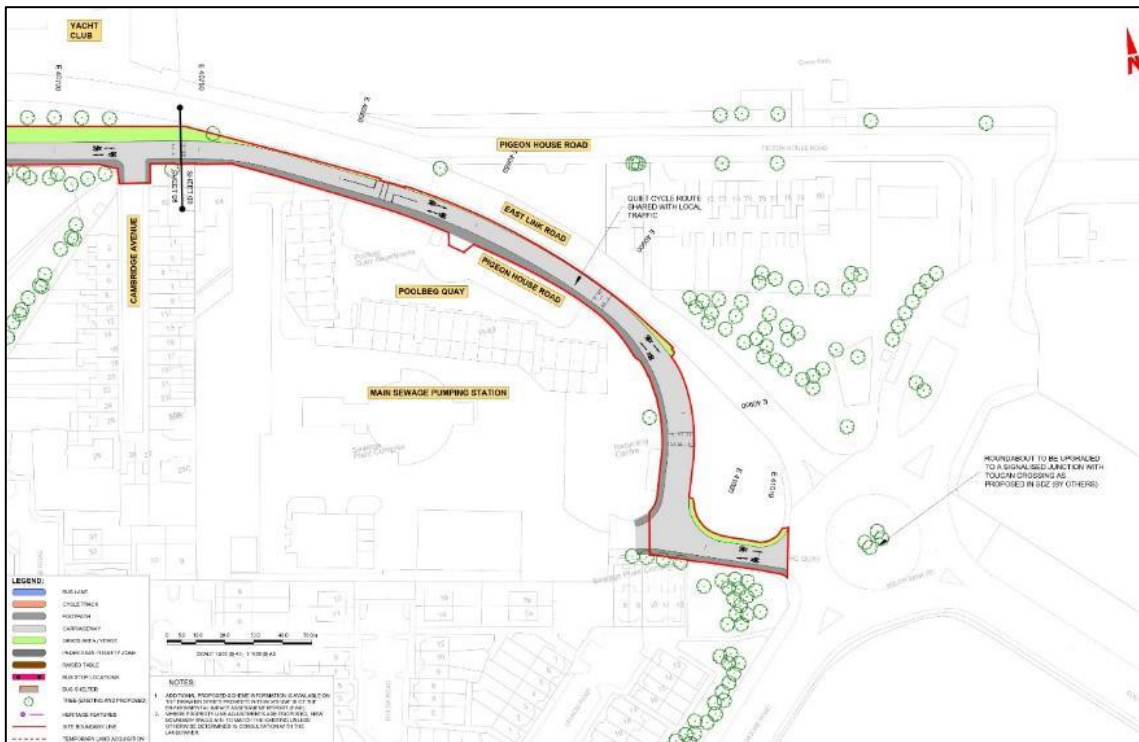


Figure 2-6-4: Extract from General Arrangement Drawing Sheet 9



Figure 2-6-7: Extract from General Arrangement Drawing Sheet 12

2.6.2 Overview of Submissions Received

Table 2.1 below lists the individual submissions made in respect of the Proposed Scheme in Section 3 Ringsend & Irishtown.

Table 2.3: Submissions Made in Respect of Section 3: Ringsend & Irishtown

No	Name	No	Name	No	Name
2	Angela Nicholson & Others	10	Dublin Cycling Campaign	15	Mary O'Neill
3	Bernadette O'Connor	12	Ivana Bacik TD	19	Rose & Edward Phipps
4	Carol Reynolds	13	Joseph Taylor	20	Sheena Bourke
6	Councillor Claire Byrne	14	Mary O'Hanlon		

2.6.3 Issues Raised for Section 3

2.6.3.1 Suggestions for Alternative Cycle Route in Ringsend

Summary of issue raised:

Various suggestions have made suggestions for alternative routing of the proposed cycle facility, including via Thorncastle Street, Cambridge Road, Library Square and local refinements of the route, as proposed.

Responses to issues raised:

The objective for the proposed cycle route is to form part of the Greater Dublin Area Cycle Network Plan with segregation from traffic as much as possible. In EIAR Volume 2, Chapter 3 *Consideration of Reasonable Alternatives*, Section 3.4.1.3.1 Section 3 Cycling Facilities through Ringsend and Irishtown there are 4 options described for the cycle route:

Option A – EPR proposal for a cycle track along the verge at York Road and Pigeon House Road and along the eastern edge of Ringsend Park

Option B – Shared running on-road on Pigeon House Road

Option C – Alternative routing via the western side of Ringsend Park; and

Option D – Combination of Option B and Option C.

Option D was preferred as the most direct route for cyclists.

The proposed route for the cycling route is identified as a primary route on the Cycle Network Plan for the Greater Dublin Area 2022. It forms part of a network of cycling routes through the Ringsend / Irishtown area, which also includes cycling routes along Thorncastle Street and Library Square (but not Cambridge Road). The ultimate provision of a cycling network will afford a variety of options for different types of cyclists, and faster cyclists will be more inclined to use on-road routes in preference to shared paths through parks and residential streets.

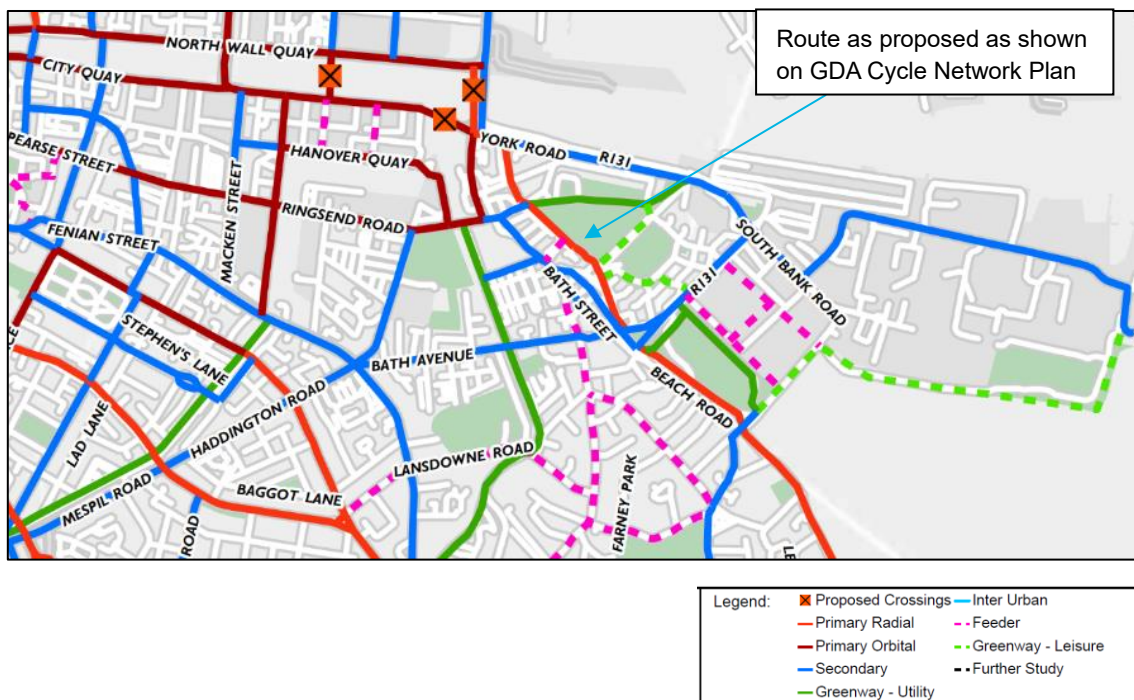


Figure 2-6-8: Extract from GDA Cycle Network Plan 2022

2.6.3.2 Local access to Cambridge Park / Pembroke Cottages and Ringsend Park

Summary of issue raised:

The submission from Ivana Bacik TD raised concerns about the maintenance of local access to Cambridge Park / Pembroke Cottages and Ringsend Park.

Response to issue raised:

It is not proposed to impose any restriction on access to Cambridge Park / Pembroke Cottages or Ringsend Park. Pembroke Cottages is a one-way street in the northbound direction and is not suitable for cyclists in the southbound direction. The General Arrangement Drawing Sheets 7 and 10 in EIAR Volume 3 Figures, Chapter 4 Proposed Scheme Description, Part 2 shows that cyclists will share the existing roads in this part of Ringsend. Northbound cyclists will have a choice of two routes along Pembroke Cottages or the laneway to the west, which is a cul-de-sac for traffic. Southbound cyclists will use the laneway and cul-de-sac street. There will be no restrictions for local traffic access, which will share these streets with cyclists on the through route.

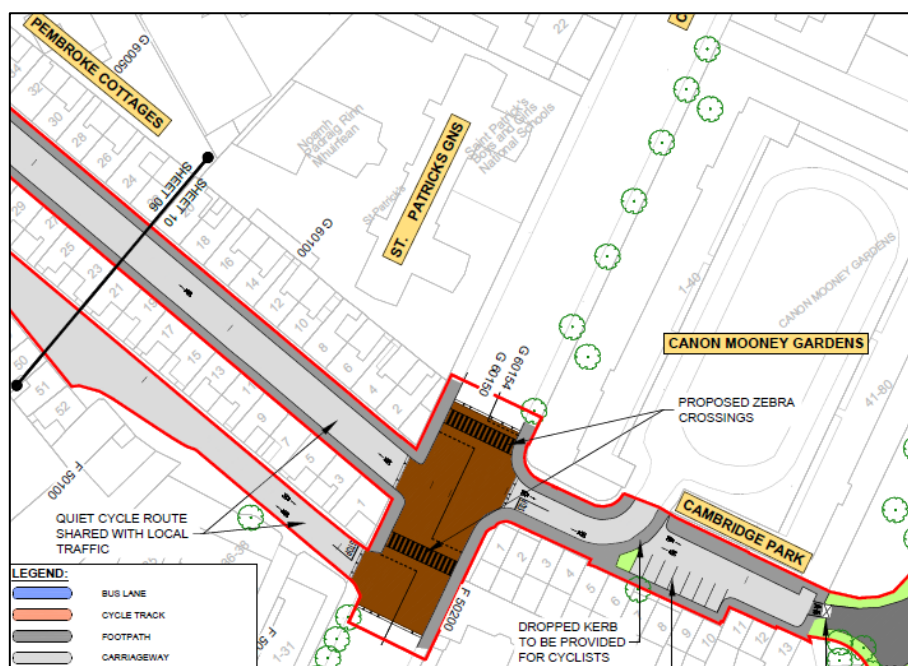


Figure 2-6-9: Extract from General Arrangement Drawing Sheet 10 showing the proposed cycling route at Pembroke Cottages and Cambridge Road

2.6.3.3 Objections to Cycling in Ringsend Park

Summary of issue raised:

Various submissions have highlighted concerns in relation to the formal introduction of cycling in Ringsend Park, and that this will exacerbate anti-social behaviour patterns particular to the local area (including the irresponsible use of e-bikes, e-scooters and scrambler bikes). Concerns were also expressed in relation to the safety of pedestrians, including children, and in relation to the introduction of lighting in the park. One submission noted the existence of bye-laws prohibiting cycling in the park.

Responses to issues raised:

The issues considered have been carefully considered in the design development and assessment of the proposed scheme. Chapter 11 of the EIAR assesses the impact of the proposals on Human Health, and Section 11.4.4.3 concludes that the introduction of greater number of regular users will reduce the instances of anti-social behaviour. Chapter 6 (Traffic and Transport) in Volume 2 of the EIAR and Appendix A6.1 (Traffic Impact Assessment) Section 6.5.2.1.6.2 considers and assesses the potential impacts of the Proposed Scheme for cyclists with conclusions presented in Table 6.18 that the Level of Service for Cyclists will increase from C to A on the section through Ringsend Park. For pedestrians Section 6.5.2.1.6.2 considers and assesses the potential impacts of the Proposed Scheme in Table 6.17 and concludes that the Level of Service for Cyclists will increase from B to A on the section through Ringsend Park, mainly due to the widening of the path for shared use with cyclists. Opening of the path through the Park for use at all times will provide improved connectivity for the local community.

2.6.3.4 Impacts on Strand Street, Irishtown

Summary of issues raised:

Various submissions raised concerns about impacts on Strand Street, including, including loss of parking, noise and disturbance for residents and loss of green space.

The submissions have suggested that the cycle route should use quiet local streets rather than follow a new cycle track across green verge areas.

One submission noted that the accessible parking space on Strand Street is no longer required, because the particular resident is no longer present at the address, and that this space has recently been removed.

The residents have put forward four alternative suggestions to reduce the impacts on the Strand Street area.

Response to issues raised:

The objective for the proposed cycle route is to form part of the *East Coast Trail* as envisaged in the Greater Dublin Area Cycle Network Plan with segregation from traffic as much as possible. In EIAR Volume 2, Chapter 3 *Consideration of Reasonable Alternatives*, Section 3.4.1.3.1 Section 3 Cycling Facilities through Ringsend and Irishtown there are 4 options described for the cycle route:

- Option A – EPR proposal for a cycle track along the verge at York Road and Pigeon House Road and along the eastern edge of Ringsend Park
- Option B – Shared running on-road on Pigeon House Road
- Option C – Alternative routing via the western side of Ringsend Park; and
- Option D – Combination of Option B and Option C.

A quiet streets option would not be feasible as the network of quiet local streets in Irishtown, many of which are narrow and one-way, is disjointed and disconnected such that a very indirect route would result if that alternative were adopted. Option D was preferred as the most direct route for cyclists. It would not be possible to develop an alternative quiet streets cycle route that would not involve a section of the busy Irishtown Road and the centre of Ringsend Village where there is extensive on-street parking. The most direct and attractive cycle route is via Ringsend Park and along the side of Strand Street and Pembroke Street in Irishtown, and this was indicated in the Greater Dublin Area Cycle Network Plan adopted by NTA. Chapter 6 (Traffic and Transport) in Volume 2 of the EIAR and Appendix A6.1 (Traffic Impact Assessment) Section 6.5.2.1.6.2 considers and assesses the potential impacts of the Proposed Scheme for cyclists with conclusions presented in Table 6.18 that the Level of Service for Cyclists will increase from C to A on the section through the Irishtown area because of the provision of a largely segregated route.

At Strand Street the Proposed Scheme will provide a cycle track in the wide grass verge area with a small reduction in the overall green space as is shown in Figure 2-6-10 in an extract from General Arrangement Drawing Sheet 11 (EIAR Volume 3, Figures, Chapter 4, Part 2). The alignment has been arranged to follow the street edge of the green verge between Irishtown Stadium and Kerlogue Road so as to avoid impact for trees, and to limit severance of the green area. A minor encroachment into the road at the bend on Strand Street will impact on existing on-street informal parking, so 2 replacement parking spaces are proposed on the eastern side of the road so that there is no net loss of parking for local residents. South of Kerlogue Road the proposed cycle track is located alongside the footpath on the eastern side of the wide grass verge area.

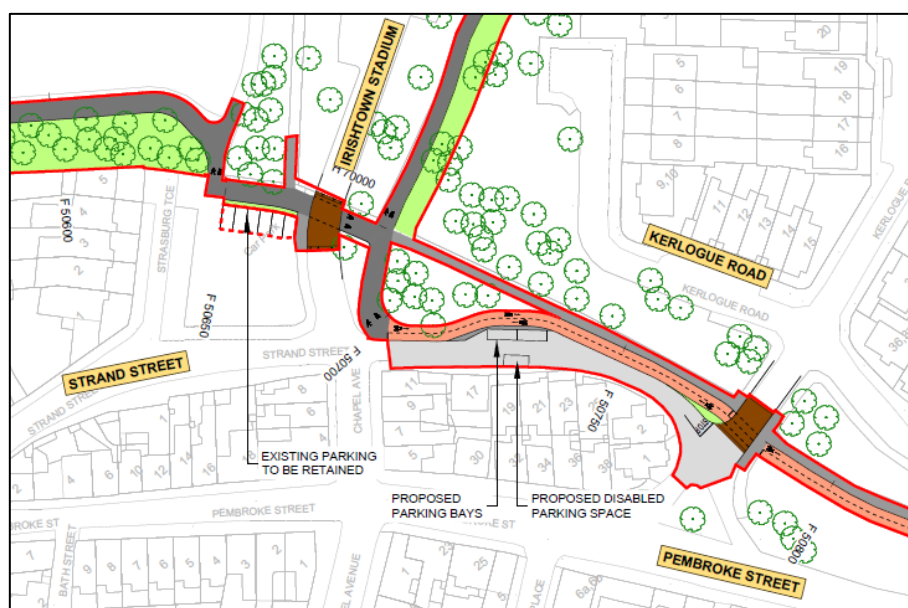


Figure 2-6-10: Extract from General Arrangement Drawing Sheet 11 (EIAR Volume 3, Figures, Chapter 4, Part 2)

2.6.3.5 The Waxies' Dargle monument at Pembroke Street

Summary of issue raised:

Various submissions have highlighted the presence of a monument to Waxies' Dargle at Pembroke Street, which wasn't identified on the scheme drawings.

Response to issues raised:

This monument is shown in the following images. It is located 5m away from the edge of the existing footpath alongside the old sea wall between Pembroke Street and Kerlogue Road.



Figure 2-6-11: Aerial view showing the location of the Waxie's Dargle Monument (circled in red)



Figure 2-6-12: View of the Waxie's Dargle Monument at Pembroke Street, Irishtown

The cycle route will pass just to the north of (behind) the Waxies' Dargle monument at a distance of 2m as shown in Figure 2-6-13 extract from General Arrangement Drawing Sheet 12 (EIAR Volume 3, Figures, Chapter 4, Part 2) and will not affect it. In the EIAR Volume 2, Chapter 22 Mitigation Measures includes for the protection of heritage features in Table 22.11: Archaeological and Cultural Heritage Mitigation Measures with measure ACH20 providing for the general principles that will apply to all existing heritage features, even if not all are specifically listed.

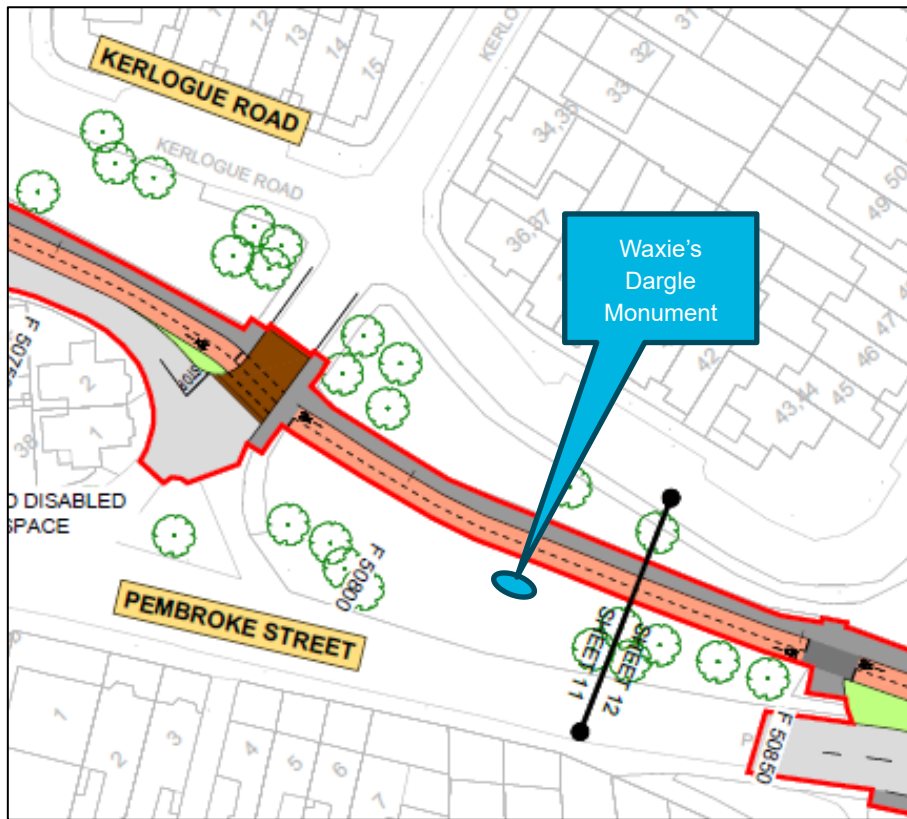


Figure 2-6-13: Extract from General Arrangement Drawing Sheet 11 (EIAR Volume 3, Figures, Chapter 4, Part 2)

2.7 Whole Scheme Submissions

2.7.1 Overview of Submissions

Issues related to the whole scheme are addressed in this section.

2.7.2 Co-ordination with other projects

Summary of issue raised:

Councillor Claire Byrne raised concerns in relation to a lack of co-ordination with other projects, including the Dodder Greenway, the Coastal Mobility route, the Draft City Centre Traffic Plan, etc.

Response to issue raised:

As described in EIAR Volume 2 Chapter 21 Cumulative Impacts the design of the scheme has taken account of the other planned projects in the area, in particular those highlighted in the submission, and these are listed in EIAR Volume 4 Appendix A21.1. Two-way cycling facilities are being proposed along both the north and south quays, in recognition of the critical importance of cycling for modal transfer, and the major intersection of cycling routes at the eastern end of the quays – including the East Coast Trail, the Dodder Cycling Route, the Liffey Cycle Route, and the proposed Dublin Port Liffey – Tolka link. Indeed, Section 3 of the route will provide a direct link to the East Coast Trail from this major intersection, as well as connecting the under-construction Poolbeg SDZ development to the city centre.

The Draft City Centre Traffic Plan was published after the submission of the Ringsend Scheme to An Bord Pleanála. However, through liaison during the development of City Centre Traffic Plan the design proposals for the Ringsend Core Bus Corridor Scheme were provided to Dublin City Council for consideration and coordination of the proposals. The City Centre Traffic Plan is consistent with the Proposed Scheme and provides for continuity of the bus and cycling facilities west of Memorial Bridge.

2.7.3 Support for the project

Summary of issue raised:

Various submissions, including that of Dublin Cycling Campaign and Ivana Bacik TD, expressed broad support for the scheme.

Response to issue raised:

The support for the scheme is noted and welcomed.

2.7.4 Construction Stage Impacts

Summary of issue raised:

Ivana Bacik TD expressed concern about the impacts on communities during the construction stage.

Response to issue raised:

Chapter 5 of the EIAR sets out the approach to construction and the intended working hours. The working hours for the proposed development are set out in Section 5.10.3 of the EIAR and are between 07:00hrs and 23:00hrs on weekdays, and between 08:00hrs and 16:30hrs on Saturdays.

The Contractor will be required to maintain regular communication with local communities, businesses and public representatives throughout the construction stage, setting out upcoming works, any service diversions, any out-of-hours work, etc. The works will be coordinated with Dublin City Council.

EIAR Chapter 10 Population and Chapter 11 Human Health provide assessments of the construction stage impacts for the communities along the route of the Proposed Scheme with reference to the various other chapters of the EIAR for specific issues such as noise and vibration or air quality. The assessments conclude that there will be Negative Slight to Moderate and Temporary impacts in various

respects. These impacts will be mitigated as much as possible by the proposed measures identified in the Construction Environmental Management Plan (CEMP) in Appendix A5.1 in Volume 4 of the EIAR.

2.7.5 Protection of Biodiversity

Summary of issue raised:

Ivana Bacik TD expressed concern about the impacts on biodiversity.

Response to issue raised:

The impacts on biodiversity are fully described and assessed in Chapter 12 of the EIAR, in which Section 12.4.3.2 Habitats, Table 12.14 lists the loss of habitat that will impact on biodiversity as follows:

- 0.4 Hectares of tidal mud-flats at the proposed River Dodder Public Transport Opening Bridge.
- 0.46 Hectares of grass areas.
- 5m of hedgerow.
- 134 trees (which will all be replaced).

The loss of these habitats is very small in scale and is unavoidable in the Proposed Scheme. Appropriate mitigation measures are described in EIAR Chapter, Section 12.5, and the assessment concludes in Section 12.6.2 for the Operational Phase:

“Following the implementation of the mitigation measures outlined in Section 12.5, the Proposed Scheme will result in a significant residual effect at the county scale on two KERs as identified in Table 12.13. However, with mitigation the majority of the remaining residual impacts are either not significant or significant at a local scale for the Proposed Scheme on its own, or cumulatively together with other proposed developments during the Operational Phase.”

The two Key Ecological Receptors referred to are the loss of tidal river and mud-flats at the mouth of the River Dodder.

2.8 Department of Housing – Development Applications Unit (DAU)

The submission from DAU addresses two issues:

- Archaeology
- Biodiversity

2.8.1 Archaeology

The submission by DAU states that “NMS has reviewed the EIAR and is broadly in agreement with the findings in relation to Archaeology and Cultural Heritage”. It then proposes a set of conditions to be attached to any consent granted for the Proposed Development, which include mitigation measures, a Construction Environmental Management Plan, a Project Archaeologist to observe the works and provision of a final archaeological report to the Planning Authority and Department describing the results of all archaeological monitoring, archaeological excavation/investigative works etc.

2.8.2 Response to Issue Raised in DAU Submission

Firstly, in the context of the response below, the NTA would like to make it known that they are aware of that the Archaeological Heritage and Miscellaneous Act 2023 (Act 23 of 2023) was signed into law on the 13 of October 2023 by the President of Ireland but are cognisant that it has yet to be commenced by the Minister. The NTA acknowledge the changes being brought on by this piece of legislation but are satisfied that such changes will not affect the assessment, nor the findings of the archaeology assessment as presented in Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR.

Secondly, the NTA welcomes the engagement of the Department in relation to the important matters of cultural heritage. The NTA has extensively considered the potential of the Proposed Scheme to impact on archaeology and has outlined a number of mitigation measures which addresses these risks in the EIAR. The NTA acknowledges the comments raised by the DAU, all of which are addressed in Chapter 15 (Archaeological & Cultural Heritage) in Volume 2 of the EIAR, including appropriate mitigation measures as noted by the DAU.

As part of the EIAR, a Construction Environmental Management Plan (CEMP) has been prepared for the Proposed Scheme and is included as Appendix A5.1 in Volume 4 of the EIAR. The CEMP will be updated by the NTA prior to finalising the Construction Contract documents for tender, so as to include any additional measures required pursuant to conditions attached to An Bord Pleanála’s decision. The CEMP comprises the construction mitigation measures, which are set out in the EIAR and NIS.

All of the measures set out in this CEMP will be implemented in full by the appointed contractor and its finalisation will not affect the robustness and adequacy of the information presented and relied upon in the EIAR and NIS.

Table 5.2 of the CEMP (refer to entries relating to Chapters 15 and 16 within the table) list out the locations of all archaeological and cultural heritage constraints which require monitoring, along with proposed actions associated with each location.

The NTA note the proposed condition to appoint a Project Archaeologist and confirm that section 15.5.1.1 of Chapter 15 of the EIAR sets out that:

The NTA will procure the services of a suitably-qualified archaeologist as part of its Employer’s Representative team administering and monitoring the works. The appointed contractor will make provision for archaeological monitoring to be carried out under licence to the DHLGH and the NMI, and will ensure the full recognition of, and the proper excavation and recording of, all archaeological soils, features, finds and deposits which may be disturbed below the ground surface. All archaeological issues will have to be resolved to the satisfaction of the DHLGH and the NMI.

Mitigation related to archaeological management is outlined in Chapter 15 of the EIAR (section 15.5.1.1.1) and also summarised in Chapter 22 of the EIAR and Table 5.2 of the CEMP. The issue of funding with respect to archaeological excavation is acknowledged by the NTA:

As part of the licensing requirement and in accordance with the funding letter, adequate funds to cover excavation, post-excavation analysis, and any testing or conservation work required will be made available.

With regard to the request for a final archaeological report to be provided to the Planning Authority and the Department, it is the intention of the NTA that liaison continues with the relevant bodies including the Department of Housing, Local Government and Heritage and the Archaeology Section of Dublin City Council in advance of, and during, the subsequent construction stage of the Proposed Scheme. This engagement will continue to take their requirements into consideration, where aligned with and consistent with the EIAR.

2.8.3 Nature Conservation

In respect to the issue of nature conservation, the submission by the DAU states *“Having considered the documentation supporting this application, and in particular the Environmental Impact Assessment Report (EIAR), the Department’s main concern from a nature conservation perspective is the potential adverse effects the proposed development may have on otter during its construction and operational phases, and particularly on otter movements between the Liffey Estuary and Royal and Grand Canals. Mitigation measures to be incorporated into an Otter Conservation Plan are therefore suggested. Also in view of the apparent recent decline in the numbers of black guillemots nesting in the stretch of the Liffey Estuary between the Matt Talbot and Tom Clarke (East Link) Bridges, the Department considers it would be very desirable that as a biodiversity enhancement measure to be undertaken as part of the presently proposed project, black guillemot nest boxes should be installed in the stretch of the Liffey quay walls.”*

Further, in their submission the DAU cite the need for a derogation licence to be granted by the National Parks and Wildlife Service (NPWS) in order for any works to be carried out as part of the proposed project in the vicinity of the active otter holt near the MV Cill Árne.

2.8.4 Response to Issue Raised in DAU Submission

The NTA welcomes the engagement of the Department in relation to the important matters relevant to nature conservation. The NTA has considered extensively the potential effects the Proposed Scheme would have on nature conservation, and biodiversity more generally, and as outlined a series of mitigation measures which addresses these potential effects in the EIAR and Natura Impact Statement (NIS). The NTA acknowledges the comments raised by the DAU on this issue, which are largely already addressed in Chapter 12 (Biodiversity) in Volume 2 of the EIAR, as well as the NIS, both of which comprise part of the suite of documentation that supports the planning application for the Proposed Scheme.

With respect to the issue of otters, the NTA welcomes the information included in the DAU submission regarding otter sightings within proximity to the Proposed Scheme, additional to that already outlined in Chapter 12 (Biodiversity) in Volume 2 of the EIAR and NIS. In regard to the presence of otter species and / or suitable habitat for such, Section 12.5.1.4.3.1 in Chapter 12 (Biodiversity) of the EIAR states that a confirmatory pre-construction check (i.e. survey) of all suitable otter habitat will be completed within 12 months prior to any construction works commencing, including a check of any presence of new holt / couch or activity at the previously established holt site at the MV Cill Árne. Section 12.5.1.4.3, Chapter 12 (Biodiversity) of the EIAR also identifies the proposed mitigation measures that will be implemented during the construction phase of the Proposed Scheme to avoid potential effects on otter populations associated with the Wicklow Mountains SAC. The aforementioned pre-construction survey will be carried out in accordance with the Guidelines for the Treatment of Otters prior to the Construction of National Road Schemes (NRA, 2006). This is the same guidance and associated mitigation measures that would feed into any formal Otter Conservation Plan. The NTA acknowledges the Department’s request that an Otter Conservation Plan be undertaken and submitted to the planning authority for its written agreement prior to the commencement of the construction phase for the Proposed Scheme, a request that the NTA is satisfied to fulfil as a condition associated with the granting of planning permission for the Proposed Scheme.

The NTA is currently in the process of applying for derogation license to undertake construction work within this habitat and will fully conform to any conditions requested in the granting of the license. It is the intention to have application completed and submitted by the end of 2023. In particular response to the Department's determination that for any works to be carried out in respect to the Proposed Scheme in the vicinity of the active otter holt near the MV Cill Árne, it is necessary for a derogation licence to be obtained in order for any such works to be undertaken. The NTA acknowledge this determination and confirms that an application for a derogation licence will be submitted to the NPWS in Quarter 1, 2024, and will refrain from undertaking any works related to the Proposed Scheme in the vicinity of the otter holt near the MV Cill Árne until such time that a licence is granted / obtained.

The NTA recognises the apparent recent decline in the numbers of black guillemots along the stretch of the Liffey Estuary between the Matt Talbot and Tom Clarke (East Link) Bridges, as outlined in Chapter 12 (Biodiversity) of the EIAR. In line with this recognition, Section 12.5.1.7.1 in Chapter 12 (Biodiversity) of the EIAR outlines mitigation measures for nesting breeding birds (including black guillemot) prior to the commencement of the construction phase of the Proposed Scheme. Such mitigation measures include:

- The NTA will ensure that a three year monitoring programme prior to the works is undertaken within breeding bird season to confirm if the quay walls at the proposed DPTOB and proposed boardwalks are used for breeding. Two years of these breeding bird surveys which form part of the three-year monitoring programme have already been completed at the time of EIAR data collection. These surveys have been recording breeding bird behaviour within the Proposed Scheme and its immediate vicinity.;
- A minimum of 10 temporary black guillemot and / or sand martin nesting boxes (unless otherwise advised by the suitably qualified ecologist based on the results of the 3-year monitoring programme) will be installed in the vicinity of the Tom Clarke (East Link) Bridge to provide alternative nesting sites for displaced birds during the construction phase;
- If breeding is recorded in the quay walls at the proposed DPTOB and boardwalks (at therefore there will be permanent habitat loss) during the (pre-construction) 3-year monitoring programme, 10 permanent nest boxes (such as Schwegler sand martin nest tunnel or Genesis black guillemot nest boxes) constructed from durable materials to ensure their longevity, will be installed in suitable locations, in order to allow birds to return to the area post construction. The appointed contractor in liaison with the suitably qualified ecologist will confirm suitable locations. Nest boxes must be located 2m above the high water mark. Examples of suitable locations may include appropriate areas of quay walls, proposed boardwalks and / proposed DPTOB, and the Tom Clark (East Link) Bridge, but ultimately the locations will be determined by the project ecologist in collaboration with the appointed contractor; and
- Monitoring of use of the prescribed bird boxes will take place annually, to check for nesting activity, and for three years post-completion of the Proposed Scheme. Monitoring will consist of visual checks by means of vantage point surveys to identify any breeding activity. Three monitoring surveys will be undertaken each year; the first survey will be undertaken in early April, the second in early May and the final survey in early June.

As is demonstrated by these proposed mitigation measures in respect to breeding birds, the Proposed Scheme is generally in line with the recommendation stated by the Department in relation to black guillemot (i.e. *“that prior to the commencement works on the proposed project the design and location of permanent black guillemot nest boxes to be installed in its vicinity shall be submitted to the planning authority for its written agreement, these proposals to include the installation of ten such nest boxes in the north wall of the Liffey quays downstream of the proposed Custom House Quay Boardwalk”*). The NTA confirms its agreement to submit to the planning authority the design and location of the 10 permanent nest boxes (such as those described above) for its written agreement, prior to the commencement of the construction phase for the Proposed Scheme. The proposed locations of the 10 permanent nest boxes will be in suitable locations along the north wall of the Liffey quays, downstream of the proposed Custom House Boardwalk. The installation of the 10 permanent nest boxes will be undertaken prior to the commencement of works and will be carried out regardless of the results of the pre-construction 3-year monitoring programme.

The NTA also wish to provide comment on the recently announced North-West Irish Sea candidate Special Protection Area (cSPA, site code 004236). Whilst it was announced since the submission of the

planning application for the Proposed Scheme, it nonetheless adjoins twelve existing SPAs from along the eastern seaboard, the majority of which e.g. South Dublin Bay and River Tolka Estuary SPA, North Bull Island SPA, Baldoyle Bay SPA, Howth Head Coast SPA, Ireland's Eye SPA, Malahide Estuary SPA, Rogerstown Estuary SPA, Lambay Island SPA, Skerries Islands SPA, Rockabill SPA are included within the assessment for the Proposed Scheme. While the majority of the listed SCIs for the cSPA are largely coastal, a number can venture inland. However, their inclusion as part of the Appropriate Assessment would not alter the outcome of the assessment presented in respect of the Proposed Scheme, as the SCI's and potential impacts from within the vicinity of the Proposed Scheme have effectively been captured in the NIS submitted in support of the planning application. This does not change the outcome of the NIS.

No changes are considered necessary to the EIAR, AA Screening Report or NIS for the Proposed Scheme on foot of the above information.

2.9 Dublin City Council

Dublin City Council's (DCC) submission comprises 63 pages and is sectionalised numerically. For ease of reference the DCC section numbering, and sub-section numbering conventions have been retained throughout the NTA's response as set out in the following paragraphs.

The NTA's response to the submission is set out as follows:

- A. Role of NTA & Liaison
- B. DCC's Support for the Scheme
- C. Certain Observations Raised / Clarification Sought by DCC
 - C1 – Response to Section 2.1 Relevant Planning History
 - C2 – Response to Section 2.2 Policy Context
 - C3 – Response to Section 2.3 Planning Assessment (sub-sections 2.4.1 to 2.4.12)
 - C4 – Response to Section 2.4 Departmental Reports, including reference to the Appendix
 - C5 – Response to Section 2.5 Conclusion
 - C6 – Response to Appendix to DCC Submission

2.9.1 Introduction

The Ringsend to City Centre Core Bus Corridor Scheme (hereinafter referred to as the "Proposed Scheme") within the Dublin City Council area is one of 12 schemes to be delivered under the BusConnects Dublin - Core Bus Corridors Infrastructure Works (hereinafter referred to as the "CBC Infrastructure Works"). The CBC Infrastructure Works is one of the initiatives within the NTA's overall BusConnects Programme.

2.9.2 Section A - Role of the National Transport Authority (NTA) and Liaison with Dublin City Council (DCC)

For context, the Environmental Impact Assessment Report (EIAR) Chapter 1 Introduction, Section 1.4, Role of the National Transport Authority, of the Ringsend to City Centre Core Bus Corridor Scheme EIAR (Volume 2 of 4) states:

"The NTA is responsible for the development and implementation of strategies to provide high quality, accessible and sustainable transport across Ireland. The NTA has a number of statutory functions including the following which are relevant to the Proposed Scheme:

- *Develop an integrated, accessible public transport network;*
- *Provide bus infrastructure and fleet and cycling facilities and schemes; and*
- *Invest in all public transport infrastructure.*

Specifically, under Section 44(1) of the 2008 Act (as amended), 'in relation to public transport infrastructure in the GDA, the Authority shall have the following functions:

- a) *to secure the provision of, or to provide, public transport infrastructure;*
- b) *to enter into agreements with other persons in order to secure the provision of such public transport infrastructure, whether by means of a concession, joint venture, public private partnership or any other means; and*
- c) *to acquire and facilitate the development of land adjacent to any public transport infrastructure where such acquisition and development contribute to the economic viability of the said infrastructure whether by agreement or by means of a compulsory purchase order made by the Authority in accordance with Part XIV of the Act of 2000.*

The Board of the NTA, at its meeting on 18 October 2019, considered whether the function of providing the public transport infrastructure comprising of the CBC Infrastructure Works should be performed by

the NTA itself under the provisions of Section 44(2)(b) of the 2008 Act. Following consideration, the Board of the NTA decided that the functions in relation to securing the provision of public transport infrastructure falling within Section 44(2)(a) of the 2008 Act (as amended) in relation to the CBC Infrastructure Works, should be performed by the NTA.

The NTA established a dedicated BusConnects Infrastructure team to advance the planning and construction of the CBC Infrastructure Works, including technical and communications resources and external service providers procured in the planning and design of the 12 Proposed Schemes.”

In early 2019, as indicated by Dublin City Council (DCC) in its submission, a multi-disciplinary corporate team (the DCC BusConnects Liaison Office) was established to provide a liaison role with the NTA. The purpose of this team/office is to effectively manage the communications and act as the primary conduit for information exchange between DCC and the NTA in relation to the BusConnects Programme.

As DCC states in its submission, this dedicated DCC BusConnects Liaison Office has facilitated the exchange of information and engagement with other departments and sections within DCC regarding the design of the Proposed Scheme.

The NTA is grateful for the positive and constructive liaison that has occurred with the DCC BusConnects Liaison Office throughout the design and planning process to date, and through that liaison office with other Departments and Sections within DCC regarding the progression of the Proposed Scheme.

2.9.3 Section B - Dublin City Council support for the Proposed Scheme

In its submission, DCC confirms its support for the Proposed Scheme, and state in their conclusion (Section 2.5 on page 53 of the submission) as follows:

“The Ringsend to City Centre Core Bus Corridor Scheme is supported and welcomed by Dublin City Council as it will ensure the delivery of a number of key policies and objectives of the Dublin City Development Plan 2022-2028 as well as the draft Dublin City Development Plan 2022-2028.”

DCC further confirms (at page 53 of its submission) that the development of the Proposed Scheme will provide an upgraded and expanded bus network and quality of service together with better quality cycling and pedestrian facilities, and DCC acknowledges that these improvements will make it easier for people to access and use public transport. It also acknowledges that the Proposed Scheme will, in turn, promote modal shift from the private car to more sustainable forms of transport including walking, cycling and public transport, ultimately contributing to the creation of a greener and more sustainable city.

In relation to planning policy, the NTA welcomes the acknowledgement by DCC (at page 13 of its submission) that, in terms of Regional Policy, the Proposed Scheme is supported by the Regional Spatial and Economic Strategy (RSES) and that DCC is of the view that the Proposed Scheme will contribute to, and support, continued improved integration of transport with land use planning and the delivery of improved high-capacity Core Bus Corridors will enable and support the delivery of both residential and economic development opportunities, facilitating the sustainable growth of Dublin City and its metropolitan area, not only seeking an improved and enhanced bus network but also places cycling at the core of its transport objectives.

In relation to the Dublin City Development Plan 2022-2028, the DCC submission (page 8) confirms that the core strategy of the development plan is that: *“the city will be a socially inclusive city of urban neighbourhoods based on the principle of the 15-minute city, which allows people’s daily requirements to be reached within 15 minutes by foot, bicycle or public transport, and is therefore compact”.*

On pages 9 to 11 of its submission, DCC notes that the Proposed Scheme will help to achieve the strategic objectives envisaged in the Dublin City Development Plan 2022-2028 pertaining to: compact growth; sustainable mobility and permeability; and place making, while significantly contributing towards climate action.

In relation to the EIAR, DCC states (at page 14 of its submission) that: *“A comprehensive EIAR has been submitted with the application examining the project under all relevant headings and finds generally that the development would not adversely impact on existing environmental amenities”* and

that *“the content [of the EIAR] points generally to the development having negligible impact on the existing environment”*.

In relation to zoning, the NTA notes that DCC sets out the view on page 15 of its submission that, *“public service installations”*, which includes bus shelters, are compatible and consistent with the zoning objectives for the area.

On page 15 of its submission, in relation to amenities, DCC states: *“Dublin City Council is satisfied that the elements of the proposed scheme which fall within the administrative area of the Council would not have any excessive or undue impact on the amenities of the area”*.

In fact, DCC goes on to state (at page 15): *“Once complete, the proposed scheme will create attractive, functional and accessible places for people alongside the core bus and cycle facilities which will enhance the amenities of the area.”*

The Forward Planning Section of DCC (on page 16) states that *“in general the Proposed Scheme is supported by the high level policies in the current Dublin City Development Plan 2022-2028.”*

The Environmental and Transportation Department of DCC set out (at page 16 of its submission) that: *“The Department is generally supportive of the improvements to bus and cycling infrastructure proposed in the overall context of encouraging a shift to sustainable mobility. In this regard the proposal generally aligns with the policies expressed in the current and forthcoming Dublin City Development Plan”*.

DCC states further that, *“[t]he commitment by the NTA within the BusConnects project to afforded to the bus service is very much welcomed. The introduction of, for the most part, separated and segregated cycle ways is again welcomed...”*. Dublin City Council goes on to state that this will provide better and safer cycling environment and help the bus maintain a steady speed and achieve its journey times.

Also, on page 16 of its submission, DCC states: *“The Traffic Section is supportive of the integrated sustainable transport proposals and recognises the significant improvements that they will bring in terms of safe cycling measures and in enabling an efficient public transportation service along these routes”*.

On page 18 of the DCC submission, the Roads Division states: *“The Roads Department is generally supportive of the scheme and its intention to improve bus and cycling provision”*.

On page 45 of the DCC submission, the City Architects Division says *“welcomes in principle the objectives of the Proposed Scheme to support sustainable transport use through infrastructure improvements for active travel (both walking and cycling) and the provision of enhances bus priority measures”*.

2.9.4 Section C - Certain Observations Raised/Clarification Sought by DCC

While, as is evidenced from the DCC submission itself, and from the extracts from the DCC submission as outlined above in section B - DCC's support for the Scheme, DCC is supportive of the Proposed Scheme and the proposed improvements to public transport in support of the shift to sustainable mobility, DCC has also raised certain queries and observations that the NTA has considered and responds to below in the next section of this report.

These queries and observations are enclosed in section 2.0 of the DCC submission, (entitled “Description of the Proposed Development”). The queries and observations are included under a number of sub-headings and for ease of reference the DCC sub-section numbering convention has been retained throughout the following paragraphs.

2.0 Description of the Proposed Development

Section 2.1 Relevant Planning History

The NTA note DCC's comments in Section 2.1 Relevant Planning History in relation to Appendix A2.1 which refers to five planning applications which are located adjacent to the Proposed Scheme. These planning applications are also considered and assessed within Chapter 21 (Cumulative Effects) in Volume 2 of the EIAR, and more specifically Appendix A21.1 in Volume 4 of the EIAR as follows:

- An application for a Strategic Housing Development City Block 2, Spencer Dock, Site bound by Sheriff Street Upper to the north, Mayor Street Upper to the south, New Wapping Street to the east and a development site to the west Dublin 1 (ABP planning reference 305219) was granted in 2020;
- An application for Strategic Housing Development Lands at Castleforbes Business Park, Sheriff Street Upper and East Road, Dublin 1. (ABP planning reference 308827) was granted in 2021;
- An Application for Strategic Housing Development Maxol Filling Station and a vacant motor sales/service garage (formerly Michael Grant Motors), Beach Road, Dublin 4. (ABP planning reference 310299) was granted in 2021;
- Permission for development for a mixed use development on a site of 15.3 hectares (including some 0.2 hectares of public domain on Sean Moore Road and the junction with Pine Road), focused primarily, but not exclusively, on a net site area of 2.4 hectares (identified as within the A3 Lands) in the Poolbeg West Strategic Development Zone Planning Scheme (April 2019).(DCC reference number PWSZ3207/21). Decision Granted; and
- Permission for development for a mixed use development (referred to as Phase 1B) on the site of 15.06 hectares including lands known as the Former Irish Glass Bottle & Fabrizia Sites, Poolbeg West, Dublin 4, focused primarily, but not exclusively, on a net site area of 0.76 hectares (identified as within the A3 Lands) in the Poolbeg West Strategic Development Zone (SDZ) Planning Scheme (April 2019). Decision Pending

Section 2.2 Policy Context

The NTA acknowledges the commentary in section 2.2 of the DCC Submission in relation to Policy Context and notes that it generally aligns with the policy context set out within the application documents namely EIAR Volume 4 Appendices Part 1 of 2, 01. A2.1 Report Planning Report for the Proposed Scheme.

Further, some additional observations by DCC over and above those already provided within Table 3.8 of the Planning Report in relation to the Dublin City Development Plan 2022-2028 are welcomed, including that the Proposed Scheme is consistent with Policies SMT1 and SMT22 of the Development Plan, which sets out the necessity to continue to promote modal shift from private car use towards more sustainable forms of transport such as cycling, walking and public transport through several Key Sustainable Transport Projects including the BusConnects Core Bus Corridor projects, which directly align with the Proposed Scheme objectives.

Similarly, it is acknowledged that Policies SMT16, SMT18 and SMT19 of the Development Plan have a direct correlation with the Proposed Scheme's objectives given the various improvements to thoroughfares and junctions, the implementation of parts of the Greater Dublin Area cycle network and improved pedestrian facilities which will provide for the needs of people with mobility impairment and/or disabilities including the elderly and parents with children.

2.2.2.1.1 Strategic Development and Regeneration Areas (SDRA)

SDRA 6 – Docklands

The DCC submission summarises the objectives for the Docklands Regeneration, which includes guiding principles of relevance to BusConnects for improvements to facilities for pedestrians, cyclists, and public transport, including new bridges over the Rivers Liffey and Dodder. Other principles relate to the preservation of heritage features and enhancement of the public realm. Where relevant, and

practicable the Proposed Scheme has been designed to deliver numerous of these objectives along the route through the Docklands area. The Planning Report in the EIAR, Volume 4, Appendix A21.1 summarises the key objectives of SDRA 6 in Table 3.12 as follows:

Table 3.12: SDRA Transport and Movement Principles

SDRA Transport and Movement Principles	How the Proposed Scheme Meets the Policy
To enhance public realm to accommodate increased pedestrian movement.	The Proposed Scheme will facilitate the sustainable growth of Dublin in delivering the transport infrastructure necessary to provide a bus network that works for a growing city. The Proposed Scheme will bring greater accessibility to the city centre and other strategic areas for people to avail of housing, jobs, amenities and services. It aims to mitigate any adverse effects that the proposals may have on the streets, spaces, local areas and landscape through the use of appropriate design responses. In addition, opportunities have been sought to enhance the public realm and landscape design where possible. Along the route of the Proposed Scheme, improvements and enhancements will be made to footpaths, walkways, and pedestrian crossings
To support the upgrading of the Campshires to deliver an improved environment for cycling and walking, along with necessary flood relief works.	The Proposed Scheme has coordinated with DCC and it has been agreed that the Proposed Scheme will develop the necessary bus and cycle infrastructure provisions, while including basic quayside provision for pedestrians and landscaping, and that Dublin City Council will develop its own complementary proposals to enhance the urban and pedestrian realm alongside.
Facilitate the delivery of the sustainable transport initiatives identified, including new pedestrian and cycle bridges at specified locations in accordance with SMTO23 including: i) Bridge from North Wall Quay at Point Depot (Point Bridge) and the widening of Tom Clarke Bridge, improve pedestrian and cycling facilities at the crossing point as well as accommodating additional public transport routes in conjunction with the Dodder Bridge. ii) Pedestrian/cycle bridge crossing the Liffey between the Samuel Beckett Bridge and the Tom Clarke Bridge.	The Sean Moore Road Scheme, the Dodder Public Transport Opening Bridge, linked with BusConnects 16 proposals, the Bridge from North Wall Quay at Point Depot (Point Bridge) and the widening of Tom Clarke Bridge, improve pedestrian and cycling facilities at the crossing point as well as accommodating additional public transport routes in conjunction with the Dodder Bridge and the Pedestrian/cycle bridge crossing the Liffey between the Samuel Beckett Bridge and the Tom Clarke Bridge are located within the Proposed Scheme. The Proposed Scheme aligns with this objective as it will not impact on the ability for the street/road schemes and bridges to be developed.
To facilitate delivery of cycle routes identified in the NTA GDA Cycle Strategy.	The Proposed Scheme aligns with the objective as Chapter 6 of the EIAR, Traffic and Transport has considered the NTA Cycle Network Plan and National Cycle Manual. The Proposed Scheme will provide the advantage of segregated cycling facilities along the preferred route in both directions. These high-quality cycle lanes help to reduce dependency on private car use for short journeys. Junctions have been designed to ensure a high level of comfort and priority for sustainable modes of travel e.g., walking, cycling and public transport, by prioritising the space and time allocated to these modes within the operation of a junction, and subsequently to accommodate the forecasted future year traffic volumes as safely and efficiently as possible within

SDRA Transport and Movement Principles	How the Proposed Scheme Meets the Policy
	the remaining space and time. This has allowed the design to maximise the number of people moving through each junction and to prioritise these sustainable modes of travel.
To include an objective for the reservation for a public road linking the national road network at the Dublin Tunnel to serve the southern port lands and adjoining areas (Southern Port Access Route) in accordance with the NTA Transport Strategy for the Greater Dublin Area 2022 – 2042.	The Proposed Scheme does not overlap with Southern Port Access Route; however it is in close proximity to the DPTOB and sections of the Proposed Scheme along York Road and Pigeon House Road.
To reconfigure Sean Moore Roundabout to a signalised junction and provide for greater accessibility of the Poolbeg West SDZ area with the city centre. This will seek to address issues of severance with the Ringsend area.	The Proposed Scheme will not impact on the objective reconfiguration of the Sean Moore Roundabout. It links the city centre with the docklands through Irishtown and Ringsend.
To improve sustainable transport connectivity both to and through the area of Dublin Port.	The Proposed Scheme will link the city centre with the Docklands and an onward cycling connection to Ringsend and Irishtown.
To support public realm improvements in East Wall to enhance permeability and connectivity to the wider area.	The Proposed Scheme aligns with the objective as along the route, improvements and enhancements will be made to footpaths, walkways, and pedestrian crossings. Additional landscaping and outdoor amenities will be provided to improve the local urban realm, which will connect existing and new areas in certain areas along the corridor.

2.2.2.2 Area Specific Plans

The DCC submission references several Strategic Development and Regeneration Areas located on or beside the core bus corridor in the Proposed Scheme which are the George’s Quay Local Area Plan, the North Lotts and Grand Canal Dock Strategic Development Zone and the Poolbeg West Strategic Development Zone.

The success of the Strategic Development and Regeneration Areas in the Dublin Docklands and Poolbeg Peninsula are dependent on enhanced public transport and active travel facilities which are provided by the Proposed Core Bus Corridor Scheme.

2.2.2.2.1 George’s Quay Local Area Plan

There are no specific provisions of this plan referred to in the DCC submission.

2.2.2.2.2 North Lotts and Grand Canal Dock Strategic Development Zone

The DCC submission notes that the SDZ outlines specific objectives for improvements to facilities for pedestrians, cyclists, and public transport, including new bridges over the Rivers Liffey and Dodder. Other principles relate to the preservation of heritage features and enhancement of the public realm. Where relevant, and practicable the Proposed Scheme has been designed to deliver numerous of these objectives along the route through the SDZ area.

2.2.2.2.3 Poolbeg West Strategic Development Zone

The DCC submission highlights the critical importance of the proposed Dodder Bridge to provide improved access to the numerous significant developments in Poolbeg that are under way or planned. An associated requirement to support the SDZ delivery is for enhanced cycle routes to the area from the city centre. These key transportation links are central to the Proposed Scheme for the Ringsend Core Bus Corridor.

2.2.2.2 Dublin City Development Plan 2022-2028

The 2022-2028 Dublin City Development Plan was adopted by the elected members on the 02/11/22 and came into effect on the 14/12/2022.

The DCC submission highlights relevant policies for the Proposed Scheme including:

***SC1** for Consolidation of the Inner City and **SC8** for Development of the Inner Suburbs*

***QHSN10** for the 15 Minute City*

***CEE12** Transition to a Low-Carbon, Climate Resilient City Economy*

***SMT1**. Modal Shift and Compact Growth*

***SMT3** Integrated Transport Network*

***SMTB** Public Realm Enhancements*

***SMT11** Pedestrians and Public Realm*

***SMTI3** City Centre Road*

***SMT18** Integration of Active Travel with Public Transport*

***SMT20** Key Sustainable Transport Projects: including BusConnects.*

The Proposed Scheme is fully aligned with all of these DCC policies, and it will deliver numerous relevant objectives in a practical and integrated fashion over the full length of two key radial routes in the north-central part of Dublin City.

2.3 Planning Assessment

2.3.1. Planning Policy

Note this is responded to in Section 2.11.3 above which highlights the many aspects of the Proposed Scheme that fully align with the relevant planning policies of the Dublin City Development Plan (2022-2028).

2.3.2. Environmental Impact Assessment Report (EIAR)

In relation to the EIAR, DCC states (at page 14 of its submission) that “[a] comprehensive EIAR is provided with the application examining the project under all relevant impacts and finds generally that the development would not adversely impact on existing environmental amenities” and they go on to say, that “the content [of the EIAR] points generally to the development having negligible impact on the existing environment”.

2.3.3. Natura 2000

In relation to the NIS, DCC states that “the assessment of the Natura Impact Statement is a matter for the Board as the competent authority”.

2.3.4. Zoning and other designations

2.3.4.1 Land Use Zoning Objectives

In relation to zoning, the NTA notes that DCC sets out the view on page 15 of its submission that, *“Overall it is considered that the proposals would be compatible and consistent with the zoning objectives for the area”*.

2.3.4.2 Built Heritage Objectives

The DCC submission notes that the Proposed Scheme traverses a Zone of Archaeological Constraint for several Recorded Monuments. It highlights the Scherzer Bridges as protected structures and that a large portion of the scheme is located in a conservation area.

2.3.4.3 Impact on amenity

On page 15 of its submission, in relation to amenities, DCC states: *“Dublin City Council is satisfied that the elements of the proposed scheme which fall within the administrative area of the Council would not have any excessive or undue impact on the amenities of the area”*.

In fact, DCC goes on to state: *“Once complete, the proposed scheme will create attractive, functional and accessible places for people alongside the core bus and cycle facilities which will enhance the amenities of the area.”*

Section 2.4 Departmental Reports (including reference to the Appendix):

The NTA responses to Departmental Reports are set out in the following sections including references, as appropriate, to the submission’s Appendix: “Departmental Recommendations / Conditions”. The NTA is grateful for the positive and constructive liaison that has occurred with the DCC BusConnects Liaison Office throughout the design and planning process to date, and through that liaison office with the other Departments and Sections within DCC regarding the progression of the Proposed Scheme.

2.4.1 Forward Planning Department

The DCC submission states that *“the Proposed Scheme is supported by the high level policies in the current Dublin City Development Plan 2022-2028”*. It requests coordination with other projects in the same area including public realm and flood defence projects along the River Liffey.

2.4.2 Environment and Transportation Department

2.4.2.1 General Comments

This part of the submission includes the following statements which are welcomed by NTA:

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

Dublin City Council is obligated to consider the Proposed Scheme in the context of the vision and range of policies set out in the current and forthcoming development Plan with a view to safeguarding the city as a place in which to live, work, visit and do business. Dublin City Council recognises that the bus is the most important mode of public transport in Dublin, and this is best illustrated by the fact that, in 2019, almost 160 million journeys were made by bus in the Dublin Region, representing 65% of all public transport trips in the Dublin area. In addition, the OCC/NTA cordon count in 2019 showed that the bus was the single highest mode of transport crossing the canal, 30% of all trips, and the bus accounted for over half of all public transport trips into the city centre.

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

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

2.4.2.2 Traffic Division

In general terms the Traffic Division of Dublin City Council is supportive of the proposed CBC scheme. It notes the proposals for signal controlled priority for buses at various locations including for turning movements at junctions and highlights the need for camera-based enforcement.

2.4.2.3 Roads Division

The Roads Division acknowledges that the Proposed Scheme “*proposes substantial improvements to bus and cycling infrastructure with provision of additional signalised crossings...*”. However, there are several specific queries and observations about the scheme proposals that are responded to in this document.

Provisions for Pedestrians

Issue Raised in DCC Submission

The DCC submission notes that “*the Ringsend Scheme could be improved by making greater provision for pedestrians by ensuring sufficient and appropriate footpath widths based on pedestrian flows (with an absolute minimum 2m width) and also by ensuring pedestrian priority throughout the routes. There are recurring situations throughout the schemes where user priority is unclear, for example at bus stops and where cycle routes cross footpaths*”. The use of the words routes and schemes in plural suggests that this is a general remark in relation to all of the BusConnects CBC routes, rather than specifically for the Ringsend Scheme. Indeed, there are no particular locations on the scheme referred to in the DCC submission.

Response to Issue Raised in DCC Submission

The existing road layout along the Ringsend Scheme is unusual compared to most other main routes in Dublin in that the footpaths are already quite wide, with generous space available in particular along the campshires of the River Liffey, except at two locations addressed later on. In the Supplementary Information for the application, the Preliminary Design Report provides a very detailed description of the existing and proposed road layout along the scheme in Table 4-2. This table lists the existing and proposed footpath widths, which vary depending on the side of the street. For example along the northern side of the street on the Liffey North Quays, the existing footpath is typically 3m wide or more. In a few places the existing footpath is narrower than 3m, such as on Custom House Quay between Memorial Bridge and George’s Dock where it will be widened by 1m to 3.5m in the Proposed Scheme. There are however two pinch-points on the northern campshire where existing buildings restrict the footpath widths considerably, and where there are significant gaps in the existing cycle track. These are at the Docklands Building opposite the CHQ Building on Custom House Quay, and at two pavilion restaurant buildings on North Wall Quay opposite Excise Walk. As described in EIAR Volume 2, Chapter 4 Scheme Description on pages 10 and 11, in the Proposed Scheme it is proposed to provide new boardwalk structures cantilevered over the River Liffey to create a 6m wide pedestrian route along the river edge behind the buildings. These boardwalks will provide very significant improvements to the pedestrian facilities along the river. In the case of the Custom House Quay location at the Docklands Building, it is proposed to retain a 1.8m wide footpath along the northern side of the building beside the new cycle track. While this is a narrow footpath, it is one of 3 parallel pedestrian routes in conjunction with the proposed boardwalk on the river side of the building, and it is expected to be the most lightly used pedestrian route at this section. EIAR Volume 2 Chapter 6, Section 6.4.6.2 provides an assessment of the Proposed Scheme for impact on pedestrian infrastructure and concludes that “*the Proposed Scheme will have a positive long-term impact on the quality of the pedestrian infrastructure*

between R802 Talbot Memorial Bridge and R131 Tom Clarke East Link Bridge during the Operational Phase”.

In relation to clarity of segregation between cyclists and pedestrians in the Proposed Ringsend Scheme, there is segregation provided to the greatest degree possible as may be seen in the General Arrangement Drawings in EIAR Volume 3, Part 2. At almost all crossing points there are traffic signals to enable pedestrians to cross the cycle tracks while cyclists are stopped. An exception to this is at the southern end of the Samuel Beckett Bridge where is a spatial constraint and the existing pedestrian priority zones are retained at each corner of the bridge. However, in the Proposed Scheme the footpath and cycle track area immediately east of the Samuel Beckett Bridge on the campshire of Sir John Rogerson’s Quay will be widened substantially by moving the kerb 2m into the road, which will greatly increase the space available for both pedestrians and cyclists and will improve the effective segregation between the two user groups in this busy location. EIAR Volume 2 Chapter 6, Section 6.4.6.2 provides an assessment of the Proposed Scheme for impact on pedestrian infrastructure which concludes in Table 6.19 that at the junction of Samuel Beckett Bridge with Sir John Rogerson’s Quay and Cardiff Lane the Level of Service for Pedestrians will improve from C to B as a result of the proposed adjustments to the layout. The other exception is in Ringsend Park where it is proposed to provide a shared facility with pedestrian priority as is the current arrangement in a similar situation in Fairview Park further north. EIAR Volume 2 Chapter 6, Section 6.4.6.2 provides an assessment of the Proposed Scheme for impact on cycling infrastructure, and it concludes in Table 6.25 that in Section 3 through the Ringsend area generally the Level of Service for Cyclists will improve from D to A as a result of the proposed cycling facilities. In table 6.24 the assessment rates the Level of Service for Pedestrians to improve from B to A in Ringsend Park as a result of the proposed widening of the existing path to be shared with cyclists. (This aspect of the Proposed Scheme is further discussed later in Section 2.4.2.9 in response to comments by the Parks and Landscape Division). At bus stops, as is the standard arrangement on all the BusConnects Core Bus Corridor schemes, pedestrian priority will apply at the raised ramp crossings between the footpath and the bus stop island. This is detailed in EIAR Volume 2, Chapter 4 Scheme Description at Section 4.6.4.5.

In conclusion, despite the comments by DCC Roads Division in their submission, the Proposed Ringsend CBC Scheme will make substantial improvements to Level of Service A for both pedestrian and cycling facilities and will provide segregation and priority for pedestrians generally throughout the route, with just one exception at the southern end of the Samuel Beckett Bridge where the existing shared areas will be retained at the corners of the bridge. It is not practicable to modify the existing arrangement on the bridge at this location where there is a major mechanical movement joint in the bridge deck that enables the bridge to swing open for river navigation.

Kerbside Loading and Servicing

Issue Raised in DCC Submission

The DCC submission comments that *“another design feature of all schemes is the reallocation of kerbside space to buses and cyclists, the impact of which is the removal of potential kerbside loading and servicing”.*

Response to Issue Raised in DCC Submission

Loading and servicing are addressed in the Proposed Scheme application documents in EIAR Volume 2, Chapter 4 Scheme Description for each route section as follows:

- Section 1 in Part 4.5.1.7, Table 4.6: North Quays 9 of 27 spaces to be removed, and South Quays none of 4 spaces to be removed.
- Section 2 in Part 4.5.2.7: none existing.
- Section 3 in Part 4.5.3.3: none existing.

Where the existing loading spaces are to be removed along the North Quays, there are alternatives available on the adjoining side streets. The removal of these loading spaces is necessary to enable continuous bus lane priority to be provided towards the eastern end of the route where bus lanes are not present. EIAR Volume 2 Chapter 6, Section 6.4.6.2.2.4 provides an assessment of the Proposed Scheme for impact on parking and loading in Section 1 as *“the overall impact of this loss of parking is*

considered to have a Negative, Slight and Long-term effect. This effect is considered acceptable in the context of the aim of the Proposed Scheme, to provide enhanced walking, cycling and bus infrastructure on this key access corridor.”

Junction of North Wall Quay and East Wall Road at Tom Clarke Bridge

Issue Raised in DCC Submission

The DCC submission notes that *“the layout of the Ringsend Scheme, where it interacts with the Point Roundabout, may require alteration as part of the signalisation and upgrade of this area”*.

Response to Issue Raised in DCC Submission

The NTA is aware of the long planned proposal by Dublin City Council for replacement of the Point Roundabout with a traffic signal junction, but the design of that separate scheme was not sufficiently defined to be included on the Proposed Scheme drawings. Any adjustments required for the Ringsend Scheme in future can be addressed in the relevant planning process for an eventual DCC scheme at that location. The NTA will continue to liaise closely with Dublin City Council in relation to the integration of the two adjoining schemes and will take their requirements into consideration, where aligned with the EIAR.

Junction of North Wall Quay and North Wall Avenue

Issue Raised in DCC Submission

The DCC submission notes that *“works are proposed to tighten the junction at North Wall Avenue with North Wall Quay”* which would be problematic for large vehicles delivering to 3-Arena.

Response to Issue Raised in DCC Submission

This comment is incorrect as is illustrated in Figure 2-9-1 below which shows the Proposed Scheme overlaid on the topographic survey. It can be seen that no change is proposed to the corner of this junction. The proposed scheme will remove the right-turn lane in the middle of the road at this junction so that a westbound bus lane can be provided. Traffic will divert via East Wall Road, turn left into Sherriff Street Upper and left again into North Wall Avenue at the northern end of the street to approach the 3-Arena from the north.

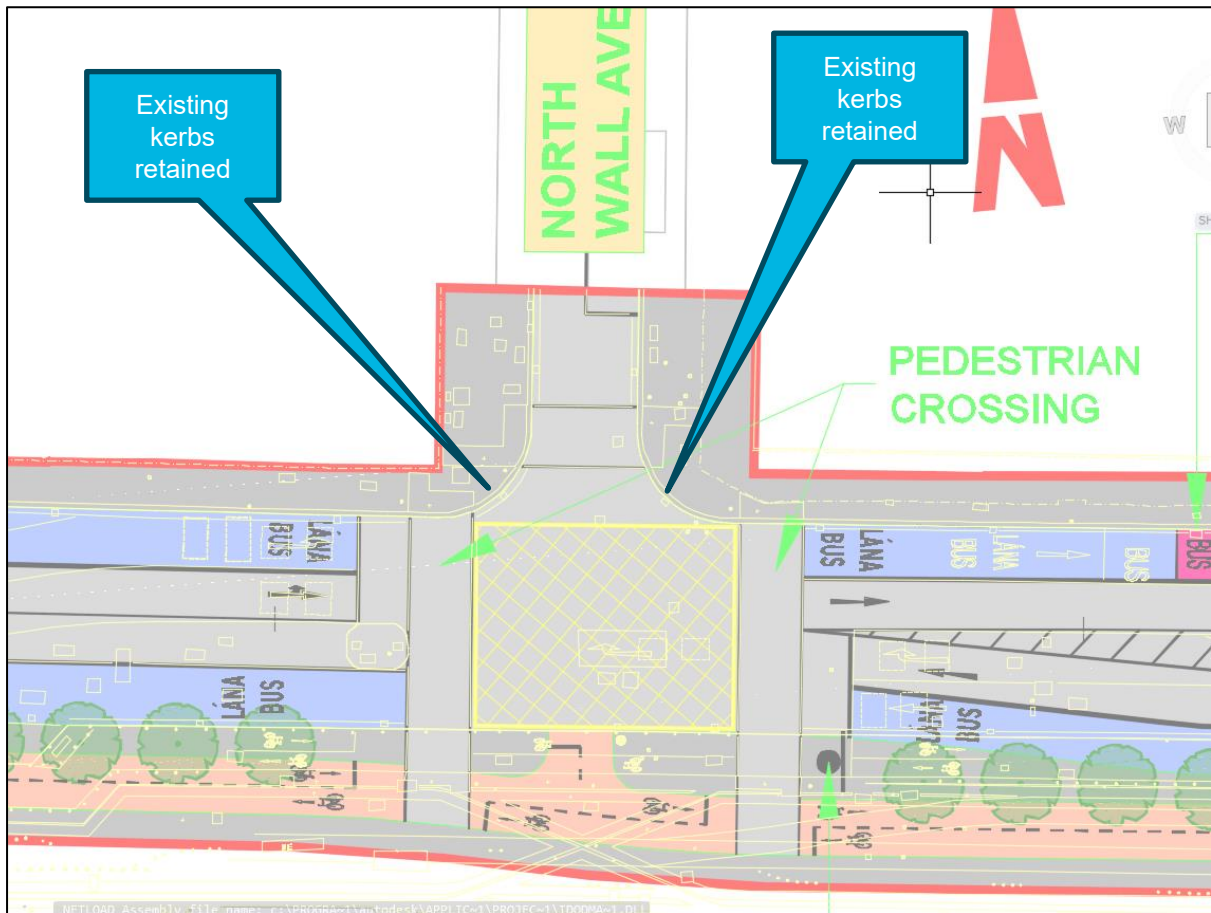


Figure 2-9-1: Extract from General Arrangement Drawing Sheet 5 at North Wall Avenue overlaid on the topographical survey

Sheet No.1

Cycle Track on the Western Side of Talbot Memorial Bridge

Issue Raised in DCC Submission

The DCC submission refers to an existing southbound cycle lane on the west of Talbot Memorial Bridge that will be removed in the Proposed Scheme as follows: “*The existing south bound cycle lane on the west side of the R802 Memorial Road approaching the Talbot Memorial Bridge, a cycle lane should be retained in this location facilitating the direct southwest bound connection on west side of the road and bridge*”.

Response to Issue Raised in DCC Submission

There is an existing northbound cycle lane on the western side of the bridge as may be seen in Figures 2-9-2 and 2-9-3 below, which is retained in the Proposed Scheme. There is no existing southbound cycle lane at that location.



Figure 2-9-2: Junction of Memorial Road and Matt Talbot Memorial Bridge (from Google Earth)

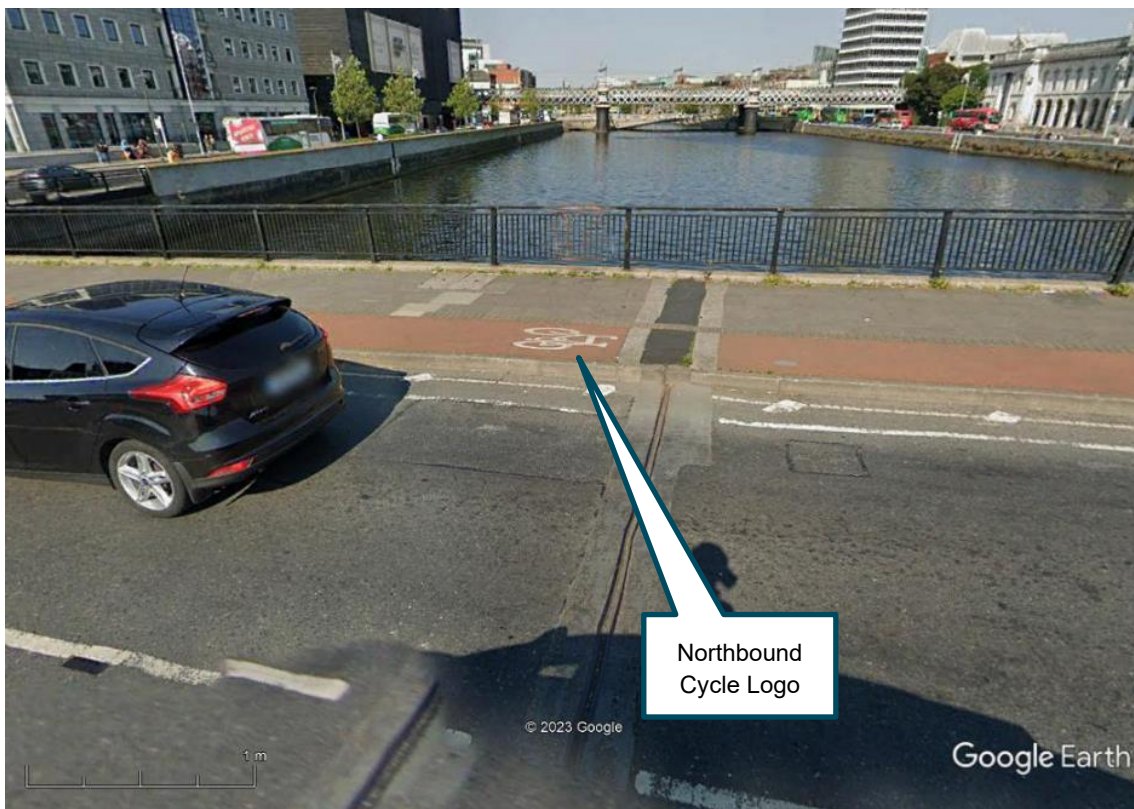


Figure 2-9-3: Existing northbound cycle track on the western side of Talbot Memorial Bridge

Pedestrian crossing on the northern arm of the junction at the southern end of Talbot Memorial Bridge.

Issue Raised in DCC Submission

The DCC submission requests that the proposed scheme should include an additional pedestrian crossing at northern side of this junction.

Response to Issue Raised in DCC Submission

The Proposed Scheme retains the existing pedestrian arrangements at this junction as shown in Figure 2-9-4. DCC may add an additional arm as a separate modification if they see such a need as part of the planned *Liffey Cycle Scheme* which is expected to change the layout on the campshire beside the river on George's Quay west of Talbot Memorial Bridge. Potentially the two-way cycle route on the river side could be extended westwards from this location. In the absence of a design for the *Liffey Cycle Scheme* on George's Quay it would be premature for the Ringsend CBC Scheme to provide an additional crossing at this location.

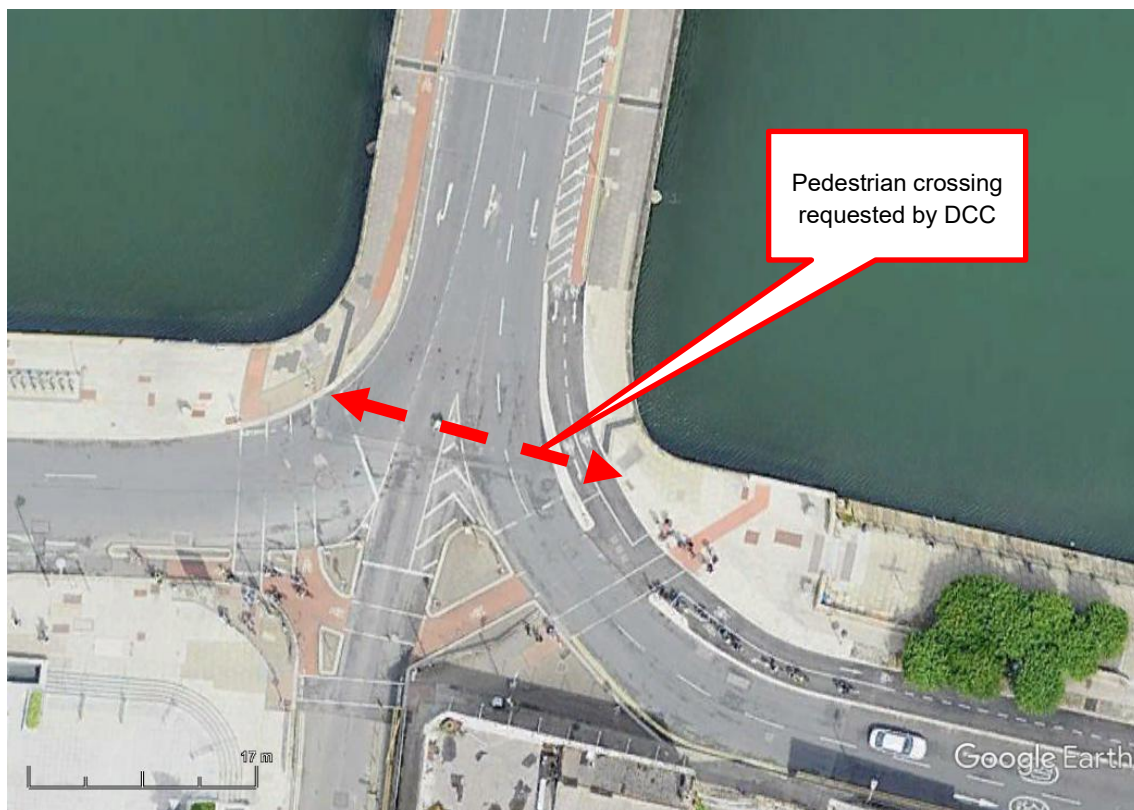


Figure 2-9-4: Existing road layout at southern end of Talbot Memorial Bridge

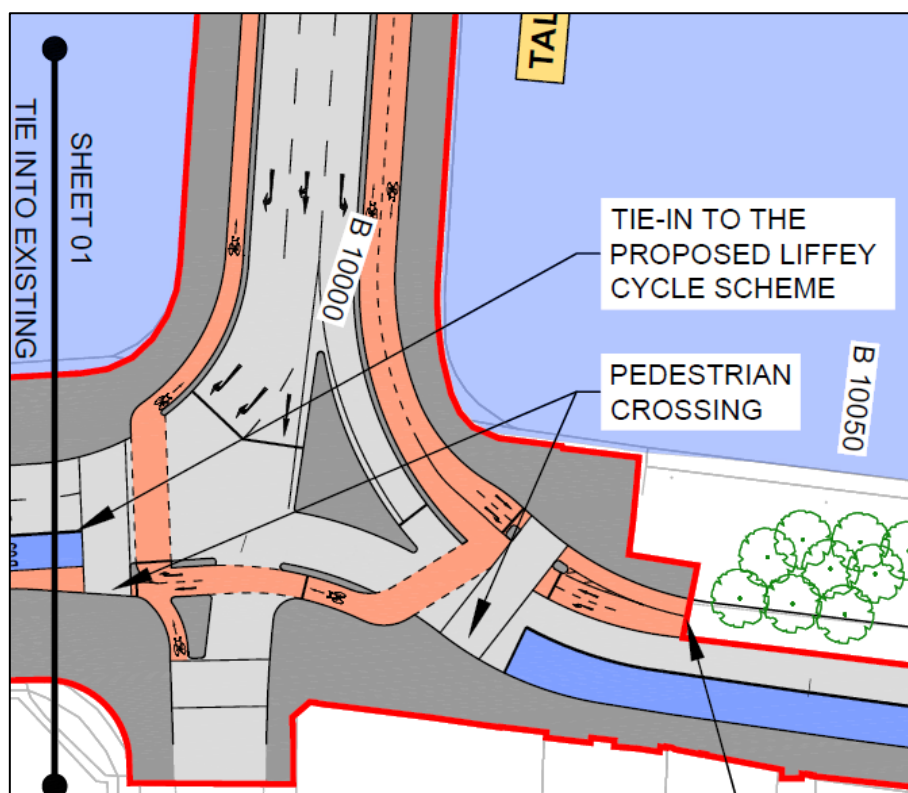


Figure 2-9-5: Proposed road layout at southern end of Talbot Memorial Bridge

Junction at Lombard Street East

Issue Raised in DCC Submission

The DCC submission requests that the pedestrian crossing on the eastern arm of this junction be moved further west.

Response to Issue Raised in DCC Submission

This junction has been designed to enable turning cyclists to move in the centre of the junction at the same as pedestrians crossing the cycle tracks at the edges. The pedestrian crossing locations are pulled away from the centre of the junction slightly to allow space for separation of turning cyclists from straight-ahead cyclist movements. This also makes the pedestrian crossing distances slightly shorter.

Sheet No.2

Southwestern corner of Samuel Beckett Bridge

Issue Raised in DCC Submission

The DCC submission requests that a pedestrian crossing be provided on the eastern side of this junction across Sir. John Rogerson's Quay.

Response to Issue Raised in DCC Submission

There is an existing uncontrolled pedestrian crossing of Sir. John Rogerson's Quay located 40m east of the junction. In the Proposed Scheme there is provision for more direct connectivity for pedestrians and cyclists at the crossing of Sir John Rogerson's Quay with parallel signal-controlled crossings side by side on the eastern side of the junction as is shown in EIAR Volume 3 Figures, Chapter 4 Part 2 General Arrangement Drawing Sheet No.2, and in Part 10 Junction Systems Design Sheet No.13 from which an extract is provided below in Figure 2-9-6. The request by DCC is therefore already included in the scheme.

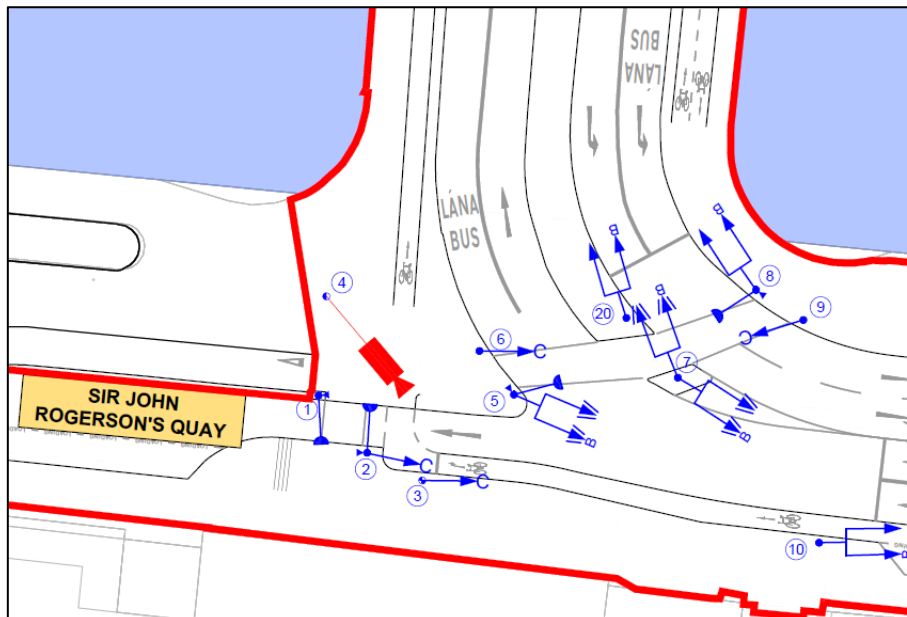


Figure 2-9-6: Extract from Junction Systems Design Sheet 13 at Samuel Beckett Bridge South

Southeastern corner of Samuel Beckett Bridge

Issue Raised in DCC Submission

The DCC submission requests improvements to the existing provisions for pedestrians and cyclists at the southeastern corner of the bridge.

Response to Issue Raised in DCC Submission

There is a spatial constraint at this location where there is a shared space for pedestrians and cyclists which can be seen in Figure 2-9-7.

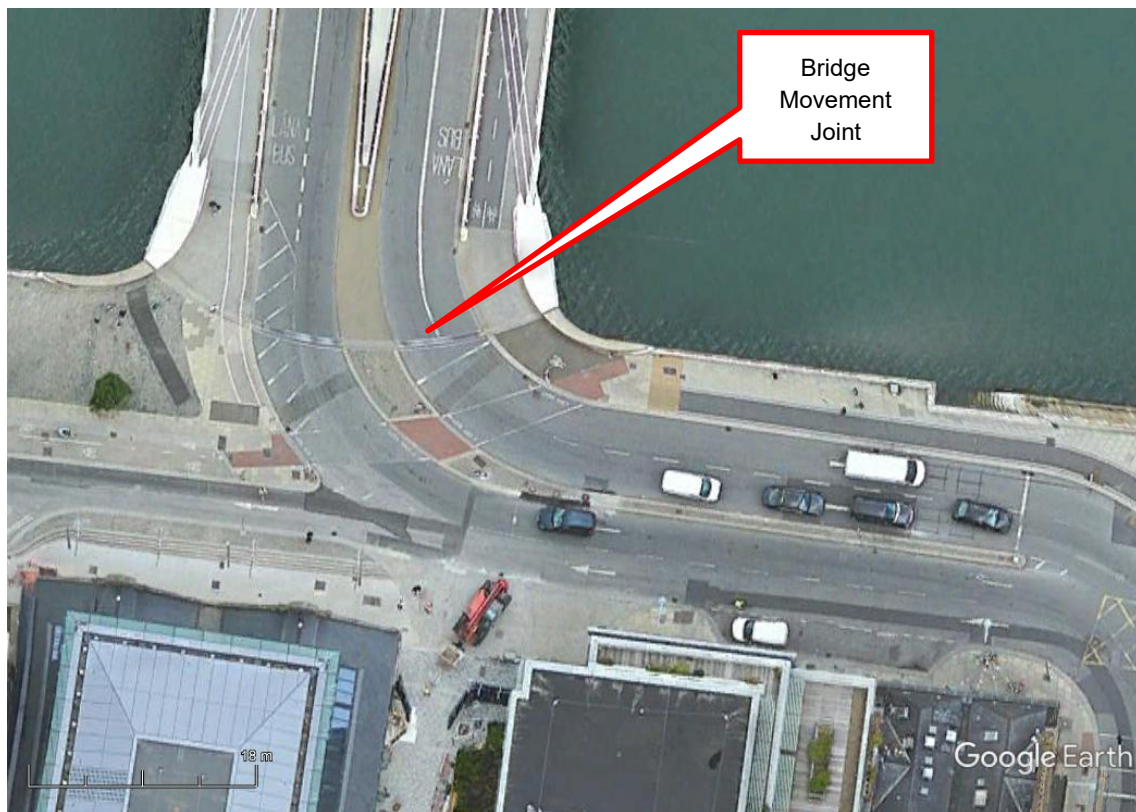


Figure 2-9-7: Existing Road Layout at Samuel Beckett Bridge South

In the Proposed Scheme the footpath and cycle track area immediately east of the Samuel Beckett Bridge on the campshire of Sir John Rogerson's Quay will be widened substantially by moving the kerb 2m into the road, which will greatly increase the space available for both pedestrians and cyclists and will improve the effective segregation between the two user groups in this busy location.

In the EIAR Volume 2, Chapter 3, Consideration of Reasonable Alternatives, Section 3.4.1.1.6 describes the 3 options that were considered for cycling facilities on Samuel Beckett Bridge. To fully separate the two groups of users would require widening into the road and removal of the existing bus lane which would cause difficulties for the proposed city centre orbital bus route, and for eastbound buses heading for Ringsend. Neither would it be practicable to modify the existing arrangement on the bridge at this location where there is a major mechanical movement joint in the bridge deck that enables the bridge to swing open for river navigation. Separate proposals by DCC for a new footbridge to the east would reduce the pressure of people on the Samuel Beckett Bridge.

Coach Stops on the North Quays

Issue Raised in DCC Submission

The DCC submission queries the need for layby coach stops that encroach into the campshires.

Response to Issue Raised in DCC Submission

In EIAR Volume 2, Chapter 4 Description of the Proposed Scheme, Section 4.6.4.5.3 states that "Layby bus stops can provide an effective solution for coaches with long dwell times at bus stops, allowing other buses to pass the stopped bus. These are important on routes where the frequency of buses is high and where bunching can occur if inline bus stops are provided along the entire length of the Proposed Scheme (i.e. the north quays)." Coaches stopping on the North Quays have long dwell times as passengers disembark and unload baggage, which blocks the bus lanes for faster city bus services. The Proposed Scheme will resolve this problem through provision of layby coach stops so that other bus lane users are not impeded.

Sheet No.7

Junction of York Road / Cambridge Road / Pigeon House Road

Issue Raised in DCC Submission

The DCC submission requests this junction to be upgraded but does not explain why.

Response to Issue Raised in DCC Submission

There is a mini-roundabout at this minor junction where there is little traffic following the closure of Pigeon House Road to traffic at the eastern end several years ago. It is an appropriate form of junction control on a quiet street route that slows traffic suitably for cyclists to share the road with traffic.

Sheet No.10

Junction of Cambridge Road and Pembroke Cottages

Issue Raised in DCC Submission

The DCC submission requests a "*controlled crossing*" at this junction.

Response to Issue Raised in DCC Submission

The Proposed Scheme will provide a raised platform and a pair of zebra crossings at this junction. This is a controlled crossing, and a zebra is more appropriate than traffic signals on a quiet residential street so that delay is minimised for pedestrians and cyclists who will be able to cross on demand.

2.4.2.4 Environmental Protection Division

Pages 20 to 22 of the DCC submission including reference to the Appendix:

Drainage System – General Comments

Issues Raised in DCC Submission

The DCC submission consists mainly of a synopsis of the general requirements of the City Council for appropriate management of the surface water drainage system in the city area. There are a number of location specific comments which are addressed later on in this response document.

Response to Issues Raised in DCC Submission

Through the very positive and constructive liaison relationship with the DCC BusConnects Liaison Office throughout the design and planning process there has been consultation with the DCC Environmental Protection Division in regard to the need for Sustainable Environmental Infrastructure as part of the development of the Proposed Scheme.

The NTA has, in consultation with DCC, followed the principles of integrating Sustainable Urban Drainage Systems with all other environmental aspects of the Proposed Scheme using best practice solutions appropriate to the Proposed Scheme. This has included consideration of a softer engineered approach as applicable to manage surface water at source as a greener, more environmentally effective approach for managing storm water. EIAR Chapter 13, Section 13.4.1.1 outlines the key design principles for the proposed surface water management design for the scheme.

In regard to the Recommendations/Conditions of the Environmental Protection Division set out in the Appendix NTA is satisfied as set out above that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Environmental Protection Division inputs regarding criteria and processes as these matters were the subject of extensive liaison throughout the design development process.

These points can be grouped under three general headings, which are responded to below:

Sustainable Drainage and Permeability

The drainage design is based on a number of general principles, which are set out in the document 'BusConnects Core Bus Corridor Drainage Design Basis' (NTA 2020) which is included as Appendix K of the Preliminary Design Report in the Supplementary Information. A SuDS drainage design has been developed as a first preference and in accordance with the SuDS Management Train described in the CIRIA SuDS manual (CIRIA 2015). The CIRIA SuDS Manual recommends that when considering SuDS solutions, the preferred approach is a hierarchy whereby runoff using source control solutions (e.g. pervious surfacing) are considered first. Where source control is not possible or cannot fully address an increase in runoff from a development, residual flows are then managed using site controls (e.g. bioretention / infiltration basins). If this is not practical or residual flows remain above existing runoff rates, regional controls (e.g., oversized pipes) are used. SuDS provide the dual benefits of controlling flow and treating water quality.

In areas where the catchment is proposed to remain unchanged as no additional impermeable areas are proposed, the design consists of relocating existing gullies (where possible) to new locations.

The NTA also confirms that it will liaise with and develop the detailed design of the scheme drainage in collaboration with DCC Drainage Planning, Policy and Development Section and will similarly liaise and collaborate in relation to connections and diversions.

Drainage Details

A number of comments refer to the proposed drainage details included in the 'BusConnects Core Bus Corridor Drainage Design Basis' (NTA 2020) which is included as Appendix K of the Preliminary Design Report in the Supplementary Information. In this regard it is noted that the Proposed Scheme, and indeed the BusConnects Dublin Infrastructure Works as a whole, interacts with numerous local authorities, who have differing requirements in relation to drainage details. The BusConnects Core Bus Corridor Drainage Design Basis' document includes options for consideration that have been developed

with regard to the necessary standards and good industry practice. The NTA will continue to liaise closely with Dublin City Council Environmental Protection Department and will take their requirements into consideration, where aligned with the EIAR.

Flood Risk

The Flood risk associated with the Proposed Scheme is dealt with within the Flood Risk Assessment included in Appendix A13.2 in EIAR Volume 4 Appendices Part 3 of 4. The FRA has been prepared in accordance with the Department of the Environment, Heritage and Local Government (DEHLG) and the Office of Public Works (OPW) Planning System and Flood Risk Management Guidelines for Planning Authorities (hereafter referred to as the FRM Guidelines) (DEHLG and OPW 2009). The Flood Risk Assessment covers three stages of a Site Specific Flood Risk Assessment (Identification of flood risk, initial flood risk assessment and detailed assessment supported by CFRAM hydraulic modelling). The Flood Risk Assessment also includes the 'Development Management Justification Test' (box 5.1 of the 2009 Planning System Flood Risk Management Guidelines), and concludes that the development satisfies the requirements of the Development Management JT (Justification Test). Refer to section 7.5 of the Flood Risk Assessment report.

In relation to pluvial flood risk, it should be noted that all of the proposed networks have been modelled independently of their length. The proposed networks are attenuated to existing runoff rates before discharging to the existing network. Where possible, SuDS and GI measures have been incorporated.

Drainage System – Specific Comments

Issues Raised in DCC Submission

The DCC submission on contains a number of specific comments:

1. *“Tree pits and SuDS devices should be employed where possible...”* with references to various locations along the Proposed Scheme.
2. *“Ch. D30000, .. a bio-retention system could be used here rather than oversized pipes, etc.”.*
3. *“Infiltration tests to be carried out...”.*
4. *More information requested about discharge points for each catchment.*

Response to Issues Raised in DCC Submission

- 1 The DCC submission has highlighted locations with significant numbers of proposed new trees as shown on the Landscape Drawings in EIAR Volume 3 Figures, Chapter 4 Scheme Description Part 5. Where feasible these new trees will be planted in tree pits, which will benefit the trees through regular irrigation, as well as managing the discharge of surface water drainage in a sustainable manner.
- 2 Ch. D-30000 is located just to the south of the Tom Clarke Bridge at Ringsend, and on the Surface Water Drainage Drawings in EIAR Volume 3 Figures, Chapter 4 Scheme Description Part 11 Sheet 6, there is an oversized pipe shown as mentioned in the DCC submission and as shown in the extract in Figure 2-9-8. This pipe takes the surface water from the eastern part of the proposed River Dodder Public Transport Bridge and connects to the existing combined sewer drainage pipe at York Road. DCC has suggested the provision of a bio-retention system in the green area between the East Link Road and York Road beside the route of this proposed pipe. However, there are existing trees in that green area that are proposed for retention, along with additional new trees, which would need to be removed if a bio-retention system were installed. To avoid the loss of the trees that are an important landscape feature in an area with very few trees, the proposed scheme will instead use an over-sized pipe to achieve the desired drainage attenuation.

Water Framework Directive

Issues Raised in DCC Submission

The submission disagrees with the evaluation of the sensitivity of identified Water Framework Directive (WFD) receptors in Section 13.2.4.2 of EIAR Chapter 13 (Water) for waterbodies in proximity to the Proposed Scheme. It requests that an evidence-based assessment of the impact of the Proposed Scheme on the water quality status of waterbodies within the curtilage of the proposed project, including both ecological and chemical status.

Response to Issues Raised in DCC Submission

Section 13.1 of EIAR Chapter 13 Water states the following: *“An assessment of Proposed Scheme’s compliance with the Water Framework Directive (WFD) (Directive 2000/60/EC) requirements is provided in Appendix A13.1 WFD Assessment in Volume 4 of this EIAR; the status of WFD water bodies and protected areas within the Study Area are provided in Section 13.3.3 and a summary of the conclusions of the WFD assessment is provided in Section 13.6.3.”*

Section 13.2.2 of Chapter 13 details the relevant guidelines, policy and legislation and the WFD is listed as the first item in Section 13.2.2.1. In the final paragraph of Section 13.2.2.1, it is stated that: *“In the absence of WFD assessment guidance specific to Ireland, the assessment has been carried out using the UK Environment Agency’s ‘Water Framework Directive assessment: Estuarine and Coastal waters’ 2016 (updated 2017) (Environment Agency 2016). No specific guidance exists for freshwater waterbodies. However, this guidance was used as the basis of the UK’s Planning Inspectorate (PINS) Advisory Note 18 ‘Water Framework Directive’ June 2017 (PINS 2017) in which it sets out the stages of an assessment. On this basis it is considered appropriate to use for the assessment of the Proposed Scheme.”*

Appendix A13.1 (Water Framework Directive Compliance Assessment) of the EIAR Volume 4 Part 3 of 4 documents that the design of the Proposed Scheme has taken account of the primary requirements of the EU Water Framework Directive to protect and improve water quality in all waters, including surface waters. These contiguous waterbodies are protected waterbodies under Article 4 of the Water Framework Directive. To support the achievement of the legislative obligations the Proposed Scheme is designed to ensure no deterioration of the status of any waterbody to which it is contiguous with downstream and will not jeopardise the attainment of good ecological and good surface water chemical status. The assessment has been produced in support of the application using publicly available data. It is an assessment in its own right, independent of the EIAR but using the same scheme detail and data, in addition to that which is WFD specific.

In Section 13.3.9.1 of Chapter 13 (Water) in Volume 2 of the EIAR, the Liffey Estuary Upper was assigned Very High sensitivity as the waterbody is a Nutrient Sensitive Area and a WFD Protected Area; it is assessed by the EPA as being of Good Ecological Status; and also has an indirect connection to European Designated Sites; at its closest point, it is approximately 6km from North Dublin Bay SAC. In Section 13.3.9.2 of the same Chapter, the Liffey Estuary Lower was also assigned Very High sensitivity. This is due to the waterbody being a Nutrient Sensitive Area and a WFD Protected Area; it is assessed by the EPA to be of Moderate Ecological Status; it has a direct hydrological connection with South Dublin Bay and Tolka Estuary SPA and North Dublin Bay SAC. A less direct connection is also made with South Dublin Bay SAC, however the 1.8km harbour wall prevents immediate mixing of the estuary and the South Dublin Bay SAC. At its closest point to the Proposed Scheme, the Liffey Estuary Upper is approximately 1.9km from the South Dublin Bay and Tolka Estuary SPA and 4km from the North Dublin Bay SAC. In Section 13.3.9.3, the Royal Canal was assigned High sensitivity as the waterbody is a Potential National heritage Area (pNHA) and is of Good Ecological Potential. Section 13.3.9.4 of Chapter 13 (Water) in Volume 2 of the EIAR states that while the Grand Canal (and Grand Canal Basin) is in proximity to the Proposed Scheme, it has been excluded from assessment as it is located upstream of the Proposed Scheme and is not tidal; water flows through the locks to the Liffey Estuary Lower, it does not flow in the return direction. The River Dodder is assigned a High sensitivity in Section 13.3.9.5 of Chapter 13 (Water) in Volume 2 of the EIAR as it has Moderate Ecological Status; it has a direct ecological connection to the Liffey Estuary Lower which is a Nutrient Protected Area; it has an indirect hydrological connection to South Dublin Bay and Tolka Estuary SPA (2.9km) and North Dublin Bay SAC (5km). It is not a designated Salmonoid River, however there is an important trout fishery and salmon in the lower sections of the River Dodder with ongoing work to remove weirs opening up more of the

river for passage. Dublin Bay has been assigned a sensitivity of Extremely High as it has international and national designations (i.e. UNESCO Biosphere Reserve and numerous European Designated Sites).

An interpretation of the likely effects of the Proposed Scheme with regard to these data is included in the impact assessment section of the WFD compliance (Section 13.6.3 and Table 13.19) which detail the compliance of the proposed scheme with the environmental objectives of the WFD.

For chemical status, the evidence-based Compliance Assessment concludes that during construction there is potential for accidental release of chemicals which are on the Environmental Quality Standards Directive (EQSD) list (for example, hydrocarbons); however, with the implementation of control and mitigation measures outlined in the SWMP there will be no significant impacts. No substances on the EQSD list will be released during operation (Table A0.6). Further, it has been concluded that the study area is known to contain sources of known pressures including UWWTP SWOs and a number of Industrial Licensed Emissions. The Proposed Scheme does not include any new discharge points and will not impact the flow or volume of current surface water drainage. A CEMP and a SWMP (Appendix A5.1 in Volume 4 of the EIAR) will also be implemented to mitigate potential impacts in relation to surface water contamination.

The evidence-based Compliance Assessment records that for ecology, habitats and fish were assessed in line with all relevant guidance, as outlined in Tables A0.4 and A0.5 of the Assessment. Risks to ecology under WFD include loss of habitat, loss of protected species and prey species. The assessment concludes that the potential for these impacts will not be significant. WFD Assessment primarily considers the operation of a scheme, however, for biological elements, potential construction impacts are often considered as they have the potential for long-term change if a potential impact is considered to be significant. Therefore, the Compliance Assessment notes that a CEMP (Appendix A5.1) which includes a SWMP in Volume 4 of the EIAR will be implemented for construction management and sediment control measures, respectively.

The evidence-based Compliance Assessment records that for fish, the risks to the receptor are due to noise from construction and operation; potential release of suspended sediment concentrations, and the creation of plumes as a result; and contaminated surface water runoff. Chapter 9 (Noise & Vibration) in Volume 2 of the EIAR has determined that, significant negative noise effects are likely during the construction phase of the Proposed Scheme however such effects are expected to be temporary and localised. No significant negative noise effects are expected during the operational phase. As above, a CEMP and SWMP (Appendix A5.1 in Volume 4 of the EIAR) will be adhered to, to reduce any risk of suspended solid release. In the unlikely event of an accidental spillage, the emergency response plan will be activated, and onsite spill kits utilised. Appropriate mitigation measures with regards to the protection of fish species and their habitats are outlined in Section 13.5 of Chapter 13 (Water) in Volume 2 of the EIAR. The Proposed Scheme does not propose to increase the current flow or volume of surface water runoff. Overall, the WFD assessment concludes there is no risk of deterioration to the overall status of the waterbodies or fish (ecology) in proximity to the Proposed Scheme.

The evidence-based assessment completed comprises an appropriately-scoped and comprehensive evaluation of the Proposed Scheme with regard to the WFD, and it concludes that the Proposed Scheme is consistent with the objectives of the WFD.

The design of the Proposed Scheme has taken account of the requirement under the EU Water Framework Directive to protect and improve water quality in all waters, including surface waters. To support the achievement of the legislative obligations the Proposed Scheme is designed to ensure no deterioration of the status of any waterbody to which it is contiguous with downstream and will not jeopardise the attainment of good ecological and good surface water chemical status. In this regard, it should be noted that the proposed scheme is located adjacent to the tidal estuaries of the Rivers Liffey and Dodder where there are numerous direct discharges of surface water drainage to these waterbodies. Most of the scheme entails adjustments to the functional layout on existing impermeable surfaces with no increase in impermeable areas and no change to the surface water drainage regime, so it will therefore have no impact on water quality EIAR Volume 2 Chapter 13 Section 13.4.5.3.3 concludes: *“There will be no water quality impact during the Operational Phase of the DPTOB because runoff from the additional catchment (i.e., the DPTOB) is to be treated by permeable paving, swales / basins and attenuated by oversized pipe”*. Where there will be an increase in impermeable area at the River Dodder Bridge, the Proposed Scheme drainage system will not create additional discharge directly to the river. Instead the surface water drainage system from the bridge will be piped to discharge

into the existing surface water sewer at York Road from where it will flow to the Ringsend Waste Water Treatment plant before discharge to Dublin Bay. In the Ringsend and Irishtown area there will be minor increases in impermeable areas along the proposed cycle tracks. These paved areas are located on existing grass verges alongside existing footpaths that do not have positive drainage, and instead the surface water infiltrates into the adjoining grassed areas. This arrangement will be retained in the Proposed Scheme where the widened paths and cycle tracks will likewise drain by infiltration. The runoff from these areas will be naturally clean as they will not carry vehicular traffic.

Flood Prevention

Issues Raised in DCC Submission

The DCC submission on page 22 notes the intended provision of flood prevention measures along the River Liffey campshires alongside the Proposed BusConnects Scheme.

Response to Issues Raised in DCC Submission

NTA has previously engaged and will continue to engage further with DCC on flood prevention matters. In this regard the Proposed Scheme design has been arranged in coordination with the design of the River Liffey Flood Prevention measures by DCC, in particular along the South Quays east of Cardiff Lane.

2.4.3 Archaeology Section

Pages 22 to 32 of the DCC submission.

The submission by DCC Archaeology Section concerns 3 issues:

1. The Scherzer Bridges on the North Quays
2. Underwater archaeology
3. A modern art installation “Free-Flow” set into the paving on the northern Liffey campshire.

The NTA notes the commentary provided by the DCC Archaeology Section on the archaeological assessment undertaken for the Proposed Scheme and the recommendations set out in Appendix 1 (page 59), particularly those in respect to the two pairs of Scherzer Bridges located along the Proposed Scheme.

This response, as detailed below, is structured in a manner that is consistent with the recommendations / conditions as set out in Appendix 1 of the DCC submission so as to allow for a direct response to the issues raised in the submission.

1. Industrial Heritage

Scherzer Bridges

Issues Raised in DCC Submission

The DCC submission discusses the potential impacts for the Scherzer Bridges at length and provides extensive information about the historical context and setting of the two pairs of lifting bridges. The need for relocation of these bridges and the impact assessment are queried. The NTA notes the recommendation by the Archaeology Section to “*update the EIAR to contain revised proposals for the Scherzer Bridges and fully evaluate options for retention in situ.*”

Response to Issues Raised in DCC Submission

Options for the Scherzer Bridges were considered and determined as outlined in the Preferred Route Option Report, which is synopsised in EIAR Volume 2, Chapter 3 Consideration of Reasonable Alternatives.

The Need to Relocate the Scherzer Bridges

The NTA recognises the two pairs of Scherzer Bridges as distinctive historical landmarks in the Dublin Docklands that symbolise the heritage of the former port activities in this part of Dublin. In this regard careful consideration was given to the challenges to achieve the Proposed Scheme objectives set out in EIAR Volume 2, Chapter 1 Introduction, Sections 1.2, while respecting these heritage features, in particular to enhance the capacity and potential of the public transport system by improving bus speeds, reliability and punctuality through the provision of bus lanes and other measures to provide priority to bus movement over general traffic movements, to enhance the potential for cycling, and to ensure that the public realm is carefully considered in the design and development of the transport infrastructure and seek to enhance key urban focal points where appropriate and feasible. In EIAR Volume 2, Chapter 3 Consideration of Reasonable Alternatives, Sections 3.4.1.1.1 and 3.4.1.1.2, there is a description of the challenges for bus priority at these locations, and a summary of the numerous alternatives that were considered. This subject is covered in greater detail in the Supplementary Information Preferred Route Option Report Section 6.1.2.

There is a strategic need to improve bus priority along the north quays which is one of the main arteries linking the city centre to Dublin Port, the ferry terminals and Dublin Airport via the M50 Tunnel. This is one of the busiest bus routes in the city as it carries both city bus services and coaches towards the Airport and the northern part of the country. Many Bus Éireann services from Busáras, the Swords Express, Airlink, Aircoach, numerous national coach services to the northeast and northwest regions, and other coaches from the south of the country that terminate at Dublin Airport, all use the north quays route. In addition there is a large volume of taxi traffic on the route. All of these public transport services currently suffer significant delay on this route, mainly caused by the narrowing of the road to a single traffic lane through each of the two Scherzer Bridge pinch-points. The retention of the Scherzer Bridges in their current positions would represent an untenable constraint on the delivery of the Schemes Objectives as set out Chapter 2 Need for the Scheme for improved public transport journey time and reliability through continuous bus lane priority. In this instance the adjoining traffic lane is too busy and the proximity to major junctions are such that signal-controlled bus lane priority is not a viable alternative option. The Scherzer Bridges have to be repositioned to achieve the necessary bus lane priority on this major route.

Ongoing deterioration of the historic Scherzer Bridges requires restoration works to ensure their long-term survival. These preservation works cannot be undertaken on site, and especially not while the bridges carry heavy volumes of traffic for which they were never intended. The bridges need to be carefully disassembled and removed to a workshop where they can be restored part by part under suitable sheltered conditions and then reassembled. The Proposed Scheme should therefore be seen to provide a valuable opportunity to safeguard these important heritage features for posterity. In this regard the Proposed Scheme will enable the Protected Structure status to be actively addressed, which could not otherwise happen. If these bridges were to remain in their current locations it would not be possible to properly preserve them. Neither would it be practicable to remove them for preservation and then to reinstate them in their current locations, as this would involve much longer disruption to all modes of transport along this major route, with no improvement for the long term operation of the core bus corridor.

In the Proposed Scheme there will be a balance between the needs to preserve and protect the industrial heritage of the past port activities in the Dublin Docklands, while making suitable provision for the ongoing growth and redevelopment of this core part of the city centre area. As is demonstrated by the photographs in the DCC submission, the context around these bridges has changed dramatically, and there now are generous public realm areas where the structures can be made accessible for the general public to inspect and admire in a way that is not currently possible under the stresses of their current locations. In many ways the Proposed Scheme proposals are similar to the way that Dublin Port has erected an old crane from the same period as a prominent monument in the plaza area around the port company headquarters in front of the junction of East Wall Road and Sherriff Street Upper. This new and highly visible landmark celebrates the history of Dublin Port, and it would be complemented by similar landmarks with the restored Scherzer Bridges occupying prominent positions in the public realm areas at George's Dock plaza beside the Epic museum, in Spencer Dock public park, and on the River Liffey campshires.

In conclusion, the Proposed Scheme considered all feasible options in relation to the provision of necessary bus priority and concluded that the Scherzer Bridges need to be relocated locally. The

Proposed Scheme includes very significant proposals to conserve, celebrate and promote the heritage value of the Scherzer Bridges protected structures which would otherwise be very difficult to implement if the bridges were to remain in their current locations carrying heavy traffic loads.

Impact Assessment for Relocation of the Scherzer Bridges

The Archaeological and Cultural Impact Assessment (Chapter 15 in Volume 2 of the EIAR) and Architectural Heritage Assessment (Chapter 16 in Volume 2 of the EIAR) were informed by relevant legislation, guidelines, policy and advice notes, including: Architectural Heritage (National Inventory) and Historic Monuments (Miscellaneous Provisions) Act, 1999; Code of Practice for Archaeology agreed between the Minister for Arts, Heritage, Regional, Rural and Gaeltacht Affairs and Transport Infrastructure Ireland (TII) (National Monuments Service 2017); Convention for the Protection of the Architectural Heritage of Europe (ratified by Ireland 1997), 'Granada Convention' (Council of Europe 1985); European Convention on the Protection of the Archaeological Heritage (ratified by Ireland 1992), 'Valetta Convention' (Council of Europe 1992); Framework Convention on the Value of Cultural Heritage for Society, 'Faro Convention' (Council of Europe 2005); Framework and Principles for the Protection of the Archaeological Heritage (DAHGI 1999); and EPA Guidelines (EPA 2022); Environmental Impact Assessment of Projects – Guidance on the Preparation of the Environmental Impact Assessment Report (European Commission 2017).

The Archaeology Assessment (Chapter 15 in Volume 2 of the EIAR) and Architectural Heritage Assessment (Chapter 16 in Volume 2 of the EIAR) are based on the Proposed Scheme as designed, which includes for the separation of both pairs of Scherzer Bridges to facilitate four-lanes of traffic (inclusive of two bus lanes).

It should be noted that the Archaeology Assessment (Chapter 15 in Volume 2 of the EIAR) only assesses the ground-breaking and excavation works that are required to take place in order for both pairs of Scherzer Bridges to be separated. Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR considers and assesses the proposed intervention, the required repair works, and the relocation of the Scherzer Bridges.

As is correctly stated in the submission from the DCC Archaeology Section, Chapter 15 (Archaeology) in Volume 2 of the EIAR assesses the pre-mitigation impact of these ground breaking and reduction works associated with the Scherzer Bridges at both locations as "Negative, Significant and Permanent". As such, mitigation is proposed in order to reduce this potential effect. The proposed mitigation measures are set out in Section 15.5 of Chapter 15 (Archaeology) in Volume 2 of the EIAR. In particular respect to the proposed works at both pairs of Scherzer Bridges, the following mitigation measures are to be implemented:

- Archaeological monitoring under licence (by a suitably qualified archaeologist) will take place where any preparatory ground breaking or ground reduction works are required;
- Licensed archaeological excavation, in full or in part, of any identified archaeological remains (preservation by record) or preservation in-situ will be undertaken. Once these strategies are employed, this will result in any archaeological remains being identified, recorded and excavated out of the ground or being left in-situ as a design solution with the result that there will be no significant impact post mitigation; and
- The appointed contractor will ensure that a full and complete photographic and detailed industrial heritage record survey is undertaken (the scope of the record survey will be identified through liaison between the appointed contractor and the archaeologist and architectural heritage specialist engaged by the appointed contractor).

Similarly, Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR assesses the pre-mitigation impact of the proposed intervention, the required repair works, and the relocation of the Scherzer Bridges as "Negative, Moderate and Permanent". As such, mitigation is proposed in order to reduce this potential effect. The proposed mitigation measures are outlined in Section 16.5 of Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR. In particular respect to the proposed works at both pairs of Scherzer Bridges, the following mitigation measures are to be implemented:

- Pre-construction surveying, condition assessments and recording of the structures prior to their careful dismantling is to be undertaken by an appropriate architectural heritage specialist

engaged by the appointed contractor. This is to inform the repair, interpretation and subsequent reassembly of the Scherzer Bridges;

- The architectural heritage specialist will then oversee the protection, labelling, safe storage, repair and reinstatement of the bridges, the affected kerbs, winches, and historic masonry. The affected quay walls (DCC RPS 3173) fabric will be made available by the appointed contractor to the local authority for salvage or reuse. Works to historic fabric will be carried out 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 the EIAR; and
- The Scherzer Bridges will be restored and moved to new positions where they will accommodate pedestrians and cyclists crossing the former and existing canals.

Given the proposed mitigation measures in respect to the required ground breaking and reduction works as well as the repair works and the relocation of the Scherzer Bridges at both locations, the archaeological and architectural heritage assessments of the Proposed Scheme concluded “no significant impact” would result from such works.

In specific regard to potential effects on the visual / historic setting of both pairs of Scherzer Bridges, such potential effects are considered and assessed in Section 17.4.4.1.1 of Chapter 17 (Landscape (Townscape) & Visual) in Volume 2 of the EIAR. Within this section it is stated that:

“While the changes (brought on by the Proposed Scheme) will not alter the overall townscape character along this section of the proposed Scheme, the Scherzer Bridges are important features of the road corridor and urban realm. The separation and repositioning of the structures within an altered high quality urban realm / landscape setting will retain the visual relationship of the structures with their original siting but negates their historic lifting bridge function on the main carriageway.”

This section within Chapter 17 (Landscape (Townscape) & Visual) in Volume 2 of the EIAR goes on to conclude that together with the provision of high quality stone paving, replacement and new tree planting along sections of the north quays as well as the improved accessibility and new vantage points with the provision of the pedestrian boardwalks along Custom House Quay and North Wall Quay, the significance of these changes along this section of the Proposed Scheme will reduce over time as they become more accepted elements of the townscape and as replacement and new planting matures. As such, the potential effect on townscape / streetscape on this section of the Proposed Scheme during the operational phase is assessed as Neutral, Moderate and Short-term, becoming Neutral, Slight / Moderate and Long-term.

Potential effects on the sea locks (and their setting) at the Royal Canal underneath the Scherzer Bridges at this location are considered and assessed in Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR. Potential effects on the sea locks at the Royal Canal are assessed as Negative, Slight and Long-term.

Similarly, the quay walls at Britain Quay and Thorncastle Street are also considered and assessed in Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR. Potential effects on these features are assessed as Negative, Slight and Permanent, respectively.

2. Public Artwork

Free-Flow Art Installation

Issues Raised in DCC Submission

The DCC submission remarks that the EIAR makes no mention of modern art installation “Free-Flow” consisting of glass cobbles in light features set into the paving on the northern Liffey campshire running from Custom House Quay to the Point Depot.

Response to Issues Raised in DCC Submission

This art installation is located in paved areas on the campshires close to the river bank where there will be minimal disturbance for the alterations to the street layout in the Proposed Scheme. While these areas are indicated to be repaved on the Landscape and Urban Realm drawings (EIAR Volume 3 Figures, Chapter 4, Part 5), it is expected that as much as possible of the existing paving will be retained

undisturbed where it is in good condition. The NTA takes note of the submission by DCC in relation to the art work installation and will undertake measures to safeguard these features in the works so that they are retained and protected.

While this artwork is not referred to in the EIAR, it will not be impacted by the Proposed Scheme. Nevertheless there are mitigation strategies identified in the Chapters 15 and Chapter 16 in Volume 2 of the EIAR for the protection of features of cultural heritage interest.

In Section 15.5.1.2 of Chapter 15 in Volume 2 of the EIAR it states:

“features of a cultural heritage interest that are required to be removed on a temporary basis or for a short-term period will be removed under archaeological supervision and in accordance with a method statement in consultation with the NTA and the relevant statutory authorities. This will protect the heritage asset from any adverse impacts and ensure that it is stored safely at an agreed location prior to its reinstatement.”

Furthermore, as set out in Section 16.5.1.5.2 of Chapter 16 in Volume 2 of the EIAR:

“The architectural heritage specialist will oversee the recording, protection and monitoring prior to, and during, the Construction Phase. Works to historic fabric will be carried out 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 the EIAR.”

The NTA confirm that the ‘Free Flow’ Public Artwork will be incorporated into the landscape and urban realm design of the Proposed Scheme as necessary, ensuring that it is reinstated in its original position(s) in so far as possible.

3. Archaeology

The NTA notes the recommendation set out in the appendix by the DCC Archaeology Section to appoint a Project Archaeologist as a member of the NTA project team to oversee all archaeological aspects of the project from inception to completion. The submission recommends numerous tasks that the appointed archaeologist will manage. This recommendation is in line with Section 15.5.1.1 of Chapter 15 in Volume 2 of the EIAR whereby the following is stated:

“The NTA will procure the services of a suitably qualified archaeologist as part of its Employer’s Representative team administering and monitoring the works. The appointed contractor will make provision for archaeological monitoring to be carried out under licence to the DHLGH and the NMI, and will ensure the full recognition of, and the proper excavation and recording of, all archaeological soils, features, finds, and deposits which may be disturbed below the ground surface. All archaeological issues will have to be resolved to the satisfaction of the DHLGH and the NMI.”

The NTA will liaise with and provide copies to the DCC Archaeology Section of all Section 26 method statements, and any reports arising and provide regular updates on finds and mitigation throughout the delivery of the Proposed Scheme through to completion. Similarly, the NTA will ensure that the primary archaeological paper archive for all archaeological site investigation be prepared and deposited with the Dublin City Archaeological Archives within a timeframe to be agreed with the planning authority unless otherwise agreed with the Minister.

Underwater Archaeology

Issues Raised in DCC Submission

The DCC submission on page 24 notes the potential for impact on underwater archaeology with reference to the construction of the two proposed boardwalks at the River Liffey quay walls on the northern side of the channel. The submission acknowledges that this issue is addressed in detail in EIAR Volume 4 Appendix A15.5 and A15.6.

Response to Issues Raised in DCC Submission

The works for the proposed boardwalks at the northern quay walls will involve minimal underwater disturbance. These structures will be mainly supported off the existing massive quay walls, similar to

the extensive lengths of boardwalk further upstream. Only in one short section at the Custom House Quay boardwalk will it be necessary to install 3 tubular piles into the river bed to support the boardwalk at the eastern end where it will span over an access gangway to a river jetty. Underwater investigations have been conducted at this location (as described in EIAR Volume 2, Chapter 15, Section 15.3.2.6.2) and nothing of relevance was found. Nonetheless the proposed scheme will include monitoring during construction with supervision as described in the EIAR Volume 3, Chapter 22 Mitigation Measures Summary, Section 22.13.

2.4.4 Conservation Section

Pages 32 to 45 of the DCC submission.

General Conservation Assessment

DCC's Conservation Section acknowledges that *"a thorough study of the receiving environment has been carried out"*.

However the submission contends that the Proposed Scheme *"has not adequately considered the importance of the relationship between historic structures and their setting"*. The submission focusses on the Scherzer Bridges in particular and says that *"proposed interventions to the bridges and their immediate setting would result in significant loss of and damage to the historical industrial heritage and should therefore be omitted from the scheme"*.

The submission also notes other structural elements of the Proposed Scheme that will have minor impact on the River Liffey quay walls. Various minor heritage features throughout the scheme are noted, including lamp posts, paving and proximity of new features to protected structures, including bus stops and shelters. It notes that there will be no loss of significant trees. The submission mentions potential risks to heritage features at temporary construction compounds.

Issues Raised in DCC Submission

The submission is structured as follows:

1. Introduction (Policies and provisions to be taken into consideration)
2. Policies
 - a. Dublin City Development Plan 2022-2028;
 - b. Dublin City Tree Strategy 2016-2020;
 - c. Architectural Heritage Protection Guidelines for Planning Authorities 2011;
 - d. Department of Culture, Heritage and the Gaeltacht – Technical Advice Series
3. Findings of the Conservation Assessment
 - a. General;
 - b. The submission identifies 13 'key impacts as considered by the DCC Conservation Section:
 - i. Protected Structures and their settings;
 - ii. NIAH Structures and their settings;
 - iii. Architectural Conservation Areas;
 - iv. Conservation Areas, Z2 and Z8 Zonings;
 - v. Industrial Heritage Sites;
 - vi. Other Structures of Heritage Interest;
 - vii. Potential impacts on historic paving and kerbing, historic street furniture and lamp standards;
 - viii. Boundary Treatments;
 - ix. Cycle Lanes;

- x. New Traffic Semaphore & Signage;
 - xi. Proposed Bus Stops;
 - xii. Significant Trees; and
 - xiii. Construction Compounds.
- c. Recommendations

Response to Issues Raised in DCC Submission

1. Introduction

The DCC Conservation Section submission listed a number of particular policies in the Dublin City Development Plan 2022-2028 that they believe should be taken account of in the consideration of all proposed routes and their impacts on the architectural and built heritage.

The Dublin City Development Plan 2022-2028 has been considered in the EIAR. It is acknowledged as a data source in Section 16.2.4 of Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR:

“In light of the legislative protection afforded to the architectural and landscape heritage resource, this assessment considers the various categories of special interest and significance as defined by the statutory architectural heritage guidelines. The architectural heritage assessment is guided by the provisions of the relevant statutory instruments and relevant guidelines for the protection of the architectural heritage including:

- *The Dublin City Development Plan (DCC 2022)....”*

2. Policies

a. Dublin City Development Plan 2022-2028

The DCC Conservation Section references a number of policies from the Dublin City Development Plan 2022-2028:

- BHA2: Regarding Development of Protected Structures;
- BHA7: Regarding Architectural Conservation Areas;
- BHA8: Regarding Demolition in an ACA;
- BHA9: Regarding Conservation Areas;
- BHA10: Regarding Demolition in a Conservation Area;
- BHA15: Regarding Twentieth Century Buildings and Structures;
- BHA16: Regarding Industrial Heritage;
- BHA18: Regarding Historic Ground Surfaces;
- BHA24: Regarding Reuse and Refurbishment of Historic Buildings; and
- BHA26: Regarding Archaeological Heritage

Section 16.3.1 of Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR sets out summary of the architectural heritage assets in the receiving environment of the Proposed Scheme and references the relevant policy from the DCC Development Plan as appropriate. All of the above policies (except BHA24) mentioned by the Conservation Section in their response are referenced in the aforementioned section of Chapter 16 in Volume 2 of the EIAR. BHA24 relates to the reuse and any refurbishment of historic buildings. It is not considered that the works proposed as part of the Proposed Scheme will give rise to non-compliance with this policy.

b. Dublin City Tree Strategy 2016 to 2020

DCC quotes the Dublin City Tree Strategy 2016 to 2020. This document is referenced in Section 17.2.2.2 and 17.2.3 of Chapter 17 Landscape (Townscape) and Visual in Volume 2 of the EIAR.

The Conservation section says that where there is an unavoidable loss of historic trees, the NTA shall ensure that these are replaced with new semi-mature trees to the satisfaction of DCC.

Section 4.6.12.4 of Chapter 4 (Proposed Scheme Description) in Volume 2 of the EIAR states that an Arboricultural Impact Assessment (AIA) Report is included in Appendix A17.1 in Volume 4 of the EIAR. This identifies the likely direct and indirect impacts to trees of the Proposed Scheme along with suitable mitigation measures, as appropriate to allow for the successful retention of significant trees, or to compensate for trees to be removed.

Section 4.6.12.5 of Chapter 4 (Proposed Scheme Description) in Volume 2 of the EIAR describes the typical planting typologies that will be employed on the Proposed Scheme. With regard to new street trees, in Section 4.6.12.5.1, it states that: *“medium to large canopy trees will be provided in large urban tree pit systems to allow for protection of the soil structure and good root development (Image 4.10). In addition, ornamental planting will also be provided, providing small landscape interventions at local community spaces that comprise of a combination of street trees, seating and more formal planting arrangements. These exist at certain intervals (Image 4.11) and are often picked up as ‘focal points’. An example of this can be seen on Sheet 1 of the Landscape General Arrangement (BCIDD-ROT-ENV_LLA-0016_ML_00-DR-LL-9001), along Custom House Quay.*

With regard to urban realm design, Section 4.6.12.6 of Chapter 4 (Proposed Scheme Description) in Volume 2 of the EIAR states:

“The urban realm design is presented on the Landscape General Arrangement drawings (BCIDD-ROT-ENV_LLA-0016_ML_00-DR-LL-9001) in Volume 3 of this EIAR. Separate (illustrative) drawings are provided in Section 4.5.1.9 and Section 4.5.2.9 to further illustrate proposals within the Proposed Scheme. Much of the Proposed Scheme already has considerable street tree and ornamental planting in place however this is to be complemented by the Proposed Scheme as existing tree alignments and small residual green spaces are to be unified by being extended to gap areas, thus allowing for a more coherent design and better natural connectivity.”

c. Architectural Heritage Protection Guidelines for Planning Authorities 2011

The DCC Conservation Section references the Architectural Heritage Protection Guidelines for Planning Authorities 2011 with regard to consideration of proposals affecting boundary features.

These guidelines are referenced in the Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR. For instance, in Section 16.5 (Mitigation), it is acknowledged that EIAR Volume 4 Appendices Part 4 of 4, Appendix A16.3 (Methodology for Works Affecting Sensitive and Historic Fabric), has been prepared in accordance with the above guidelines.

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

The DCC Conservation Section references the following guidelines ‘Paving: The Conservation of Historic Ground Surfaces’ (2015) and that these should be used to guide any interventions.

These guidelines are referenced in Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR. For instance, in Section 16.5 (Mitigation), it is acknowledged that EIAR Volume 4 Appendices Part 4 of 4, Appendix A16.3 (Methodology for Works Affecting Sensitive and Historic Fabric), has been prepared in accordance with these guidelines. The DCC Conservation Section also references the guidelines ‘Iron – the repair of wrought and cast iron’. These guidelines are included in the reference list in Appendix A16.3 (Methodology for Works Affecting Sensitive Fabric) and have informed the preparation of the appendix.

3. Findings of the Conservation Assessment

a. General Response

The NTA acknowledge that the DCC Conservation Section submission finds *“that a thorough study of the receiving environment has been carried out”*, and that *“the EIAR package includes a suite of architectural heritage reports that document the subject area in detail”*. Furthermore, it is noted that the DCC Conservation Section describe Appendix A16.1 (Historical Background) in Volume 4 (Part 2) of

the EIAR as “a well-researched discussion on the history of the development of the route”, while stating that Appendix A16.2 (Inventory of Architectural heritage Sites) in Volume 4 (Part 2) of the EIAR is a “comprehensive and accurate” record describing the quality and status of the heritage structures. The DCC Conservation Section also agree that Appendix A16.3 (Methodology for Works Affecting Sensitive and Historic Fabric) in Volume 4 (Part 2) of the EIAR outlines the conservation philosophy which is to be adhered to during the design and implementation of the scheme and provides a description of the proposed interventions that will affect protected structures and other features of architectural heritage interest.

The NTA note the DCC Conservation Section’s concerns in relation to the consideration given to the relationship between historic structures and their setting, particularly in respect to the two pairs of Scherzer Bridges that are to be separated according to proposals under the Proposed Scheme. However, the NTA are satisfied in the consideration given to the relationship between historic structures and their setting and the subsequent detailed assessment of such within the EIAR for the Proposed Scheme. The reasoning for this is outlined below in further detail.

Options for the Scherzer Bridges were considered and determined as outlined in the Preferred Route Option Report. Refer to the earlier response in Section 2.4.3 of this document.

The Archaeological and Cultural Impact Assessment (Chapter 15 in Volume 2 of the EIAR) and Architectural Heritage Assessment (Chapter 16 in Volume 2 of the EIAR) were informed by relevant legislation, guidelines, policy and advice notes, including: Architectural Heritage (National Inventory) and Historic Monuments (Miscellaneous Provisions) Act, 1999; Code of Practice for Archaeology agreed between the Minister for Arts, Heritage, Regional, Rural and Gaeltacht Affairs and Transport Infrastructure Ireland (TII) (National Monuments Service 2017); Convention for the Protection of the Architectural Heritage of Europe (ratified by Ireland 1997), ‘Granada Convention’ (Council of Europe 1985); European Convention on the Protection of the Archaeological Heritage (ratified by Ireland 1992), ‘Valetta Convention’ (Council of Europe 1992); Framework Convention on the Value of Cultural Heritage for Society, ‘Faro Convention’ (Council of Europe 2005); Framework and Principles for the Protection of the Archaeological Heritage (DAHGI 1999); and EPA Guidelines (EPA 2022); Environmental Impact Assessment of Projects – Guidance on the Preparation of the Environmental Impact Assessment Report (European Commission 2017).

The Archaeology Assessment (Chapter 15 in Volume 2 of the EIAR) and Architectural Heritage Assessment (Chapter 16 in Volume 2 of the EIAR) are based on the Proposed Scheme as designed, which includes for the separation of both pairs of Scherzer Bridges to facilitate four-lanes of traffic (inclusive of two bus lanes).

It should be noted that the Archaeology Assessment (Chapter 15 in Volume 2 of the EIAR) only assesses the ground-breaking and excavation works that are required to take place in order for both pairs of Scherzer Bridges to be separated, including taking account of potential effects on the sea locks that exist underneath the Scherzer Bridges at the Royal Canal. Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR considers and assesses the proposed intervention, the required repair works, and the relocation of the Scherzer Bridges.

As is correctly stated in the submission from the DCC Archaeology Section, Chapter 15 (Archaeology) in Volume 2 of the EIAR assesses the pre-mitigation impact of these ground breaking and reduction works associated with the Scherzer Bridges at both locations as “Negative, Significant and Permanent”. As such, mitigation is proposed in order to reduce this potential effect. The proposed mitigation measures are set out in Section 15.5 of Chapter 15 (Archaeology) in Volume 2 of the EIAR. In particular respect to the proposed works at both pairs of Scherzer Bridges, the following mitigation measures are to be implemented:

- Archaeological monitoring under licence (by a suitably qualified archaeologist) will take place where any preparatory ground breaking or ground reduction works are required;
- Licensed archaeological excavation, in full or in part, of any identified archaeological remains (preservation by record) or preservation in-situ will be undertaken. Once these strategies are employed, this will result in any archaeological remains being identified, recorded and excavated out of the ground or being left in-situ as a design solution with the result that there will be no significant impact post mitigation; and

- The appointed contractor will ensure that a full and complete photographic and detailed industrial heritage record survey is undertaken (the scope of the record survey will be identified through liaison between the appointed contractor and the archaeologist and architectural heritage specialist engaged by the appointed contractor).

Similarly, Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR assesses the pre-mitigation impact of the proposed intervention, the required repair works, and the relocation of the Scherzer Bridges as “Negative, Moderate and Permanent”. As such, mitigation is proposed in order to reduce this potential effect. The proposed mitigation measures are outlined in Section 16.5 of Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR. In particular respect to the proposed works at both pairs of Scherzer Bridges, the following mitigation measures are to be implemented:

- Pre-construction surveying, condition assessments and recording of the structures prior to their careful dismantling is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor. This is to inform the repair, interpretation and subsequent reassembly of the Scherzer Bridges;
- The architectural heritage specialist will then oversee the protection, labelling, safe storage, repair and reinstatement of the bridges, the affected kerbs, winches, and historic masonry. The affected quay walls (DCC RPS 3173) fabric will be made available by the appointed contractor to the local authority for salvage or reuse. Works to historic fabric will be carried out 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 the EIAR; and
- The Scherzer Bridges will be restored and relocated to new positions where they will accommodate pedestrians and cyclists crossing the canal.

Given the aforementioned proposed mitigation measures in respect to the required ground breaking and reduction works as well as the repair works and the relocation of the Scherzer Bridges at both locations, the archaeological and architectural heritage assessments of the Proposed Scheme concluded “no significant impact” resulting from such works.

In specific regard to potential effects on the visual / historic setting of both pairs of Scherzer Bridges, such potential effects are considered and assessed in Section 17.4.4.1.1 of Chapter 17 (Landscape (Townscape) & Visual) in Volume 2 of the EIAR. Within this section it is stated that:

“While the changes (brought on by the Proposed Scheme) will not alter the overall townscape character along this section of the proposed Scheme, the Scherzer Bridges are important features of the road corridor and urban realm. The separation and repositioning of the structures within an altered high quality urban realm / landscape setting will retain the visual relationship of the structures with their original siting but negates their historic lifting bridge function on the main carriageway.”

This section within Chapter 17 (Landscape (Townscape) & Visual) in Volume 2 of the EIAR goes on to conclude that together with the provision of high quality stone paving, replacement and new tree planting along sections of the north quays as well as the improved accessibility and new vantage points with the provision of the pedestrian boardwalks along Custom House Quay and North Wall Quay, the significance of these changes along this section of the Proposed Scheme will reduce over time as they become more accepted elements of the townscape and as replacement and new planting matures. As such, the potential effect on townscape / streetscape on this section of the Proposed Scheme during the operational phase is assessed as Neutral, Moderate and Short-term, becoming Neutral, Slight / Moderate and Long-term.

Potential effects on the sea locks (and their setting) at the Royal Canal underneath the Scherzer Bridges at this location are considered and assessed in Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR. Potential effects on the sea locks at the Royal Canal are assessed as Negative, Slight and Long-term.

Similarly, the quay walls at Britain Quay and Thorncastle Street are also considered and assessed in Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR. Potential effects on these features are assessed as Negative, Slight and Permanent, respectively.

b. Key Impacts

i. Protected Structures and their settings;

The DCC Conservation Section has set out what it considers are the Protected Structures (and their settings) that will be impacted by the Proposed Scheme.

Point d) notes the works envisaged in relation to the Scherzer Bridges and requests that “the applicant fully reconsider the design of the scheme at these locations to lessen the impact on the historic Scherzer Bridges which are rare examples of their type. A full architectural heritage impact assessment by a suitably qualified conservation professional is required for any works to or near these structures”.

The NTA refers the DCC Conservation Section to its response above regarding this matter as well as the EIAR for the Proposed Scheme, where Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR sets out in detail the consideration and assessment of potential effects on architectural heritage as a result of the Proposed Scheme. Potential effects on features of architectural heritage significance, including historic fabric, are identified and assessed in this chapter, with mitigation measures proposed as necessary.

Points e) and f) note the works envisaged to quay walls at various locations along the length of the Proposed Scheme to accommodate public boardwalks and the DPTOB. The DCC Conservation Section note that “the loss of early masonry fabric is regrettable” and “such modifications constitute incremental change that will alter the visual character of the quay walls along the River Liffey”. The DCC Conservation Section requests that “a full architectural heritage impact assessment by a suitably qualified conservation professional is required for any works to these structures.”

The NTA refers the DCC Conservation Section to its response above regarding this matter as well as the EIAR for the Proposed Scheme, where Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR sets out in detail the consideration and assessment of potential effects on architectural heritage as a result of the Proposed Scheme. Potential effects on features of architectural heritage significance, including historic fabric, are identified and assessed in this chapter, with mitigation measures proposed as necessary.

Point h) requests that all Protected Structures in close proximity to construction works are to be adequately protected and all proximate works are to be supervised by a conservation professional.

This request is in line with the mitigation measures set out in Section 16.5 of Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR where it is stated that an architectural heritage specialist will oversee the recording, protection and monitoring of various heritage assets / features as well as sensitive fabric prior to, and for the duration of the construction phase of the Proposed Scheme in accordance with the methodology provided in Appendix A16.3 (Methodology for Works Affecting Sensitive and Historic Fabric) in Volume 4 of the EIAR. This appendix states in Section 1.1.1:

“Where conservation works to features are required as a result of the construction of the Proposed Scheme it will be carried out by the Contractor in accordance with the principles of the Venice and Burra Charters produced by ICOMOS Australia in 1979 and amended in 1981, 1988, 1999 and 2013. The Contractor will also adhere to the conservation principles set out in the Department of the Environment, Heritage and Local Government’s Protection Guidelines for Planning Authorities (2011) and the Department’s advice series publications on various elements.”

ii. NIAH Structures and their settings;

The DCC Conservation Section has set out what it considers are the NIAH Structures in proximity to the Proposed Scheme. It requests “all NIAH Structures in proximity to construction works are to be adequately protected and all proximate works are to be supervised by a conservation professional....”

This request is in line with the mitigation measures set out in Section 16.5 of Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR where it is stated that an architectural heritage specialist will oversee the recording, protection and monitoring of various heritage assets /

features as well as sensitive fabric prior to, and for the duration of the construction phase of the Proposed Scheme in accordance with the methodology provided in Appendix A16.3 (Methodology for Works Affecting Sensitive and Historic Fabric) in Volume 4 of the EIAR. This appendix states in Section 1.1.1:

“Where conservation works to features are required as a result of the construction of the Proposed Scheme it will be carried out by the Contractor in accordance with the principles of the Venice and Burra Charters produced by ICOMOS Australia in 1979 and amended in 1981, 1988, 1999 and 2013. The Contractor will also adhere to the conservation principles set out in the Department of the Environment, Heritage and Local Government’s Protection Guidelines for Planning Authorities (2011) and the Department’s advice series publications on various elements.”

iii. Architectural Conservation Areas;

DCC Conservation Section agrees that the Proposed Scheme is not located in any designated ACAs.

iv. Conservation Areas, Z2 and Z8 Zonings;

The NTA note DCC Conservation Section’s agreement with the reported effects on the Liffey Quays Conservation Area, which is stated as ‘Negative, Significant and Short-term’. The NTA also note DCC Conservation Section’s comments in relation to reported effects on the Royal Canal Conservation Area, which are broadly in agreement with the assessment as set out in the EIAR. Furthermore, it notes the comments in relation to the architectural design of the DPTOB and its influence on the potential enhancement of the Dodder and Grand Canal Conservation Area.

v. Industrial Heritage Sites;

The DCC Conservation Section has set out what it considers are the Industrial Heritage Sites in proximity to the Proposed Scheme.

vi. Other Structures of Heritage Interest;

The DCC Conservation Section has set out what it considers are the Other Structures of Heritage Interest in proximity to the Proposed Scheme, and while they are not included in existing inventories, they are considered to be of architectural heritage or industrial interest. The NTA acknowledges its conclusion that the Proposed Scheme will not have any detrimental visual or physical impacts to the identified properties.

vii. Potential impacts on historic paving and kerbing, historic street furniture and lamp standards;

The DCC Conservation Section outlines the lamp posts, historic paving, surface finishes and other street furniture that are in proximity to, and likely to experience potential effects from the Proposed Scheme. It requests that “early stone surfacing and kerb stones will be recorded prior to the commencement of construction, removed to safe storage and will be reinstated on a new line following the completion of works. Works should be overseen by a suitably qualified conservation professional.” This request is consistent with Section 15.5.1.2 of Chapter 15 in Volume 2 of the EIAR, where it states:

“features of a cultural heritage interest that are required to be removed on a temporary basis or for a short-term period will be removed under archaeological supervision and in accordance with a method statement in consultation with the NTA and the relevant statutory authorities. This will protect the heritage asset from any adverse impacts and ensure that it is stored safely at an agreed location prior to its reinstatement.”

Furthermore, as set out in Section 16.5.1.5.2 of Chapter 16 in Volume 2 of the EIAR:

“The architectural heritage specialist will oversee the recording, protection and monitoring prior to, and during, the Construction Phase. Works to historic fabric will be carried out 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 the EIAR.”

viii. Boundary Treatments;

The NTA note the comments by the DCC Conservation Section in regard to the proposed approach to Boundary Treatments.

There is only one location in the Proposed Scheme where an existing modern boundary wall and railing will be disturbed for road widening at the northwestern corner of George's Dock where it is intended to relocate one of the Scherzer Bridges.

Section 13.5 of the Preliminary Design Report notes the following:

“To maintain the character and setting of the Proposed Scheme, the approach to undertaking the new boundary treatment works along the corridor is replacement on a ‘like for like’ basis in terms of material selection and general aesthetics unless otherwise noted on the drawings.

Existing gates will be reused where practicable however considerations will be required for the use of bifold gates to mitigate impacts on parking in driveways. All gates will be hung such that they will open inwards onto the property.”

Proposed boundary modifications have been assessed as part of the Architectural Heritage assessment outlined in Chapter 16 of the EIAR, with appropriate mitigation measures outlined where necessary. However, in the Proposed Scheme there are no heritage boundary features affected.

ix. Cycle Lanes;

The DCC Conservation Section request for an alternative high quality cycle lane surface in-lieu of red tarmac in certain locations is impractical in a city where this would require a change of the cycle track surfacing at numerous places. It is questionable if worthwhile benefit would derive from such superficial arrangements on the main arterial streets and roads in the Proposed Scheme. To locally modify the cycle track surface would be inconsistent, and it would diminish the effectiveness of distinguishing that part of the road visually to increase awareness of vehicle drivers of the need to safeguard the road space allocated to cyclists for safety reasons.

x. New Traffic Semaphore & Signage;

The location of traffic infrastructure such as signage, traffic poles, utility boxes, etc. are shown in the Chapter 4 suite of figures in Volume 3 of the EIAR. Consideration and rationalisation of such infrastructure was undertaken as part of the design development of the Proposed Scheme. Section 16.5.2 of Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR sets out the assessment of potential effects on architectural heritage resulting from the operational phase of the Proposed Scheme, including all elements in which it comprises.

xi. Proposed Bus Stops;

The location of each bus shelter / stop along the Proposed Scheme are shown on the General Arrangement Drawings (Chapter 4 Figures) in Volume 3 of the EIAR. Details on the design of these bus stops are outlined in Section 4.6.4.5 of Chapter 4 (Proposed Scheme Description) in Volume 2 of the EIAR. Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR considers and assesses the location of bus shelters / stops in proximity to Protected Structures and structures on the NIAH (see Section 16.4.4.1 of Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR). It concludes that the potential effects of bus shelters on Protected Structures is considered to be Neutral and Long-term.

This issue is of very limited relevance to the Proposed Ringsend to City Centre CBC Scheme, as there are very few protected structure buildings along the route.

Section 4.14.3 of the Preliminary Design Report, included in the Supplementary Information outlines the requirement for Bus Shelters as part of the Proposed Scheme as follows:

“Bus shelters provide an important function in design of bus stops. The shelter will offer protection for people from poor weather, with lighting to help them feel more secure. Seating will be provided to assist ambulant disabled and older passengers and accompanied with Real Time Passenger Information (RTPI) signage to provide information on the bus services.”

As such, bus shelters have been provided where practicable as part of the Proposed Scheme.

The proposed bus stop shelters, as shown in the *Preliminary Design Guidance Booklet for BusConnects*, are of a high-quality design, constructed largely of glass panels with slimline stainless steel frames. They are discreet and highly transparent so as to have minimal visual impact on their surroundings. This type of bus shelter is widely used across Dublin and was designed for use in visually sensitive locations, including in proximity to protected structures and historic buildings. In this regard the DCC submission suggests potential negative impacts that will not arise.



Figure 2-9-10: Example of the proposed high-quality bus shelters for BusConnects

xii. Significant Trees;

The NTA note the DCC Conservation Section's comments that the Proposed Scheme will result in *"no loss of significant trees that could detrimentally impact the setting of Protected Structures or other heritage structures. It notes the inclusion of a biodiversity report within the EIAR that discusses the impacts of removal of trees and other flora on natural habitats."*

xiii. Construction Compounds.

The NTA note the DCC Conservation Section's comments in relation to the need for a conservation professional to have sign of the works involved in the preparation and establishment of the construction compounds required for the Proposed Scheme, and *"provide suitable mitigation for Protected Structures and any features or structures of architectural heritage interest. All heritage structures must be recorded in advance of works. Where a heritage feature or part of a feature is to be retained, it is to be adequately protected."*

This requirement is consistent with Section 16.5.1.5.2 of Chapter 16 in Volume 2 of the EIAR:

"The architectural heritage specialist will oversee the recording, protection and monitoring prior to, and during, the Construction Phase. Works to historic fabric will be carried out 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 the EIAR."

c. Recommendations / Conditions (set out within Appendix 1)

Response to recommendations / conditions included in Appendix 1 of the DCC Submission are provided at the end of this response document for all sections of the DCC Submission.

2.4.5 City Architect's Division

Pages 45 to 53 of the DCC submission.

General Assessment

NTA acknowledges that DCC's City Architect's Division welcomes "in principle the objectives of the Proposed Scheme to support integrated sustainable transport use through infrastructure improvements for active travel (both walking and cycling), and the provision of enhanced bus priority measures". The submission also welcomes the various proposed public realm improvements. It is noted that there have been previous engagements with the BusConnects project office on numerous occasions during the design development for the Proposed Scheme.

Footpath Widths

Issue Raised in DCC Submission

The DCC submission (on page 46) is as follows:

"The provision of footpaths designed to the minimum width may not be sufficient in areas of high pedestrian traffic and in urban villages. Footpath widths also need to account for congregations of passengers waiting in the vicinity of bus stops."

Response to Issue Raised in DCC Submission

Refer to a previous response to comments on this subject from the DCC Roads Division in Section 2.4.2.3. EIAR Volume 2 Chapter 6, Section 6.4.6.2 provides an assessment of the Proposed Scheme for impact on pedestrian infrastructure which concludes that on most of the route the Level of Service for Pedestrians will improve to A, or at least B in one constrained location as a result of the proposed adjustments to the footpaths layout.

The Proposed Scheme consists mainly of modifications to the traffic layout along existing streets and roads. The existing footpaths are largely unaffected in the scheme proposals, and it was a key consideration not to reduce the existing footpath widths unless absolutely necessary. The existing footpath widths within the proposed scheme are generally more than satisfactory for the pedestrian traffic, which varies considerably along the various streets and roads. In the busiest parts of the route along the River Liffey Quays on the frontage of the buildings the footpaths are generally about 3m wide, and wider in some places. In addition there is very generous space for pedestrians on the River Liffey campshires ranging from 8m wide on City Quay on the south quays at the western end to 11m wide on North Wall Quay at the eastern end. In just one location near the southeastern corner of the Samuel Beckett Bridge is the existing footpath very narrow at only 1.8m wide adjacent to a narrow cycle track. In the proposed scheme this area will be widened by 2m through encroachment into the road, with an additional 1m allocated each to the footpath and cycle track. (Refer to Section 2.4.3.1 earlier for more details).

Island bus stops are proposed at appropriate places along the scheme where it is expected that generous waiting space is desirable to cater for congregations of passengers.

Overall the concern expressed on this subject by the City Architect's Division is not therefore applicable to the Proposed Scheme.

Public Realm Improvements

Issue Raised in DCC Submission

The DCC submission (on page 47) lists 6 locations where the proposed scheme will provide public realm improvements but says that there is insufficient information provided.

Response to Issue Raised in DCC Submission

The aim of the Proposed Scheme is to provide enhanced walking, cycling and bus infrastructure on this key access corridor in the Dublin region, which will enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor. The Proposed Scheme will greatly improve transport services for all that live along the route of the Proposed Scheme by providing significantly

improved sustainable transport options. Furthermore, it is an objective of the Proposed Scheme to ensure that the public realm is carefully considered in the design and development of the transport infrastructure and seek to enhance key urban focal points where appropriate and feasible.

As set out in Chapter 4 (Proposed Scheme Description) of Volume 2 of the EIAR, the landscape and urban realm proposals are derived from analysis of the existing urban realm which allowed the designers to consider appropriate enhancement opportunities along the route. The enhancement opportunities include key nodal locations which focus on locally upgrading the quality of the paving materials, extending planting, decluttering of streetscape and general placemaking along the route. Along the route there will be a number of enhancements to specific urban realm hot spots where there is a clear opportunity to improve existing key public spaces as illustrated in EIAR Volume 3, Figures, Chapter 4 Proposed Scheme Description Part 5 on the Landscape General Arrangement Drawings.

NTA will continue to liaise with DCC in regard to public realm improvements in the detailed design stage.

Land Acquisition

Issue Raised in DCC Submission

The DCC submission (on page 47) is as follows:

“Land Acquisition by NTA & Taking In Charge:

Where it is proposed to CPO or acquire lands as part of the Proposed Scheme, confirmation is sought as to whether ownership of these lands will be transferred to the relevant local authority or will these lands be retained by the NTA but taken in charge by the relevant local authority for maintenance purposes.”

Response to Issue Raised in DCC Submission

Under the provisions of the relevant legislation, the NTA has exercised certain powers under Section 44(2)(b) of the 2008 Act to the effect that the functions in relation to securing the provision of public transport infrastructure falling within Section 44(2)(a) of the 2008 Act (as amended) in relation to the CBC Infrastructure Works, should be performed by the NTA. Those functions include the design and construction of the Proposed Scheme and, effectively, the NTA becomes the road authority in respect of the exercise of those functions.

Under the relevant legislation, upon the completion of the construction of the Proposed Scheme the NTA automatically ceases to be the road authority and the status of DCC as the relevant road authority is automatically restored – it does not require the operation of the conventional “taking-in-charge” arrangements provided for elsewhere in legislation. Accordingly, the legislative provisions appropriately govern the arrangements for the NTA to commence the construction of the Proposed Scheme, subject to the necessary planning and environmental consents, and govern the restoration of the road authority function to the relevant local authority, in this case being Dublin City Council. Consequently all CPO lands acquired by NTA for purposes of the Proposed Scheme will be transferred to the relevant local authority.

Bus Stop Shelters

Issue Raised in DCC Submission

The DCC submission (on page 47) is as follows:

“Bus shelters impact on the width of footpaths and should only be proposed where there is sufficient space to physically accommodate them and passengers congregating in their vicinity. Bus shelter locations are indicated on the drawings but information on their proposed design, size and type is not provided.”

“The proposed location of new bus shelters in the vicinity of buildings of architectural importance, in Conservation Areas, In Architectural Conservation Areas (ACA's), and Special Planning Control Schemes (SPCS) needs to be carefully considered.” No specific locations are referred to in this regard.

In the Interest of visual amenity and having regard to protected structures and their settings, advertisements should preferably not be permitted on bus shelters In Architectural Conservation Areas (ACA) or Special Planning Control Schemes (SPCS)."

Response to Issue Raised in DCC Submission

This issue was also raised in the submission by the Conservation Section and has been responded to earlier in Section 2.4.4 in relation to the high-quality design of the bus stop shelters, which are widely used across Dublin, and are already in place beside protected structures and in conservation areas along the Proposed Scheme, so there will effectively be no change from the existing situations.

Siting of Utility Cabinets and Above-Ground Utility Infrastructure

Issue Raised in DCC Submission

The DCC submission (on page 48) notes that the siting of utility cabinets, poles and other above-ground utility infrastructure may have significant impacts on the space, visual impact and quality of the public realm.

Response to Issue Raised in DCC Submission

BusConnects will require minimal new utility cabinets unlike for example a LUAS light-rail tram line which involves overhead power lines and completely separate signalling and control system. Most of the utility requirements in the Proposed Scheme occur at traffic signal junctions where there are existing cabinets for traffic signal controllers, and for CCTV monitoring. Minor adaptation will be required of these cabinets and equipment in terms of their external appearance and positioning.

The NTA shares the concerns of DCC to minimise visual clutter along the core bus corridors. Significant efforts have been made during the design process to minimise above-ground utility infrastructure where practicable. Where such infrastructure is necessary it has been positioned in appropriate locations, and rationalised where practicable. Usually above ground cabinets are placed beside boundaries at the back of footpaths to be out of the way and visually discreet.

On-Street Parking

Issue Raised in DCC Submission

The DCC submission seeks provision of on-street electrical charging facilities at parking spaces to be included in the Proposed Scheme.

Response to Issue Raised in DCC Submission

The Proposed Scheme is intended to provide enhanced facilities for public transport and active travel. It would not be appropriate in such a scheme to address the issue of on-street electrical charging facilities at parking spaces which is a separate matter for the local authority and the electrical supply utilities.

Palette of Materials

Issue Raised in DCC Submission

The DCC submission (on page 48) comments on the proposals for footpath paving in general and with particular reference to certain areas such as the northern side of Custom House Quay in front of the IFSC building, and on the southern side of City Quay.

Response to Issue Raised in DCC Submission

The existing footpaths and paved areas along the River Liffey quays and campshires are generally of high-quality and in good repair. The general intention in the Proposed Scheme is to retain all existing good quality paved areas, unless they are necessarily disturbed by the proposed works, and to replace like with like only where necessary. In places such as the southern side of City Quay there are extensive areas of newly constructed footpaths, associated with adjoining frontage development. The NTA sees

no justification to replace these footpaths and to upgrade the materials where they will not be otherwise disturbed in the Proposed Scheme.

Palette of Street Furniture

Issue Raised in DCC Submission

The DCC submission (on page 49) notes that a full palette of street furniture is required and seeks confirmation as to whether an identical palette is to be used for the proposed scheme across all local authority areas or whether each local authority, or even each urban village, will have a specific palette. It is further requested that confirmation be provided on whether there will be uniformity in the palette of street furniture across all BusConnects Core Bus Corridor Schemes.

Response to Issue Raised in DCC Submission

Section 16.5.1.7 of EIAR Volume 2 Chapter 16 Architectural Heritage includes details of the impacts on existing street furniture of heritage value due to the Proposed Scheme, including post boxes, lamp posts and statuary and other street furniture. NTA will continue the very positive and constructive liaison with DCC City Architects Department throughout the procurement and construction process including in relation to the final detailing of new street furniture.

Boundary Treatments

Issue Raised in DCC Submission

The DCC submission (on page 49) notes that where property boundaries are to be relocated to facilitate land acquisition, the fabric of existing boundaries should be assessed for their architectural conservation value and cultural value. DCC note that this assessment should consider whether the fabric, which may include railings, walls etc. is suitable for repair and reuse for sustainability reasons in the new boundaries rather than replaced with new.

Response to Issue Raised in DCC Submission

There is only one location in the Proposed Scheme where an existing boundary wall and railing will be disturbed for road widening at the northwestern corner of George's Dock where it is intended to relocate one of the Scherzer Bridges.

Section 13.5 of the Preliminary Design Report notes the following:

“To maintain the character and setting of the Proposed Scheme, the approach to undertaking the new boundary treatment works along the corridor is replacement on a ‘like for like’ basis in terms of material selection and general aesthetics unless otherwise noted on the drawings.

Existing gates will be reused where practicable however considerations will be required for the use of bifold gates to mitigate impacts on parking in driveways. All gates will be hung such that they will open inwards onto the property.”

Proposed boundary modifications have been assessed as part of the Architectural Heritage assessment outlined in Chapter 16 of the EIAR, with appropriate mitigation measures outlined where necessary.

Structures in the Proposed Scheme

Issue Raised in DCC Submission

The DCC submission (on pages 49 and 50) refers to existing and proposed structures including the two pairs of Scherzer Bridges, and the two proposed boardwalks along the north quays, in the following respects:

- Scherzer Bridges:
 - Conservation Impact Statement and Method Statement requested.
 - Former lifting process to be physically marked somehow.
 - Explain reason for re-orientating bridges at Spencer Dock.

- Boardwalks: Conservation Impact Statement and Method Statement requested for the quay walls.

Response to Issue Raised in DCC Submission

the submission from DCC City Architect's Division in relation to the proposal to relocate the Scherzer Bridges seeks to ensure that the dismantling, preservation and reassembly works are undertaken in the appropriate manner.

For the proposed works at the Scherzer Bridges the requirements for a Conservation Impact Statement and Method Statement are outlined in EIAR Volume 2, Chapter 15, Section 15.5.1.1.1, and these are included as a proposed mitigation measure ACH7 and ACH12 in Chapter 22 of the EIAR.

As part of the restoration works, where practicable it is proposed to salvage and renovate the lifting machinery in the bridges. The restoration of the bridges will include the provision of information panels to explain how the lifting process operated.

In the Proposed Scheme the pair of Scherzer Bridges at George's Dock will be re-oriented from their current arrangement so that the lifting mechanisms are on the eastern, rather than the western side. The reason for this is described in Section 8 of the conservation specialist report in EIAR Volume 4 Appendix 3.1, *Relocation of Scherzer Bridges, Dublin City: Industrial Heritage and Options Appraisal*. The conclusion of the specialist assessment is provided in Section 8.3 of that report as follows:

“Option D would best retain the Scherzer bridges' heritage value in the long term, i.e. moving them apart to make way for a new four-lane road bridge, reversing their orientation, and restricting their use to pedestrians and cyclists. Moreover, the insertion of a footpath alongside the new bridge will also bring the relocated Inner Scherzer into a more satisfactory visual alignment with Stack B.”

The Stack B building is a protected structure located close to the west of the entrance channel to George's Dock, where there is limited footpath space behind the opening bridge machinery and counterweight superstructure as is clear from the photograph in Figure 6.9 of the specialist report below.

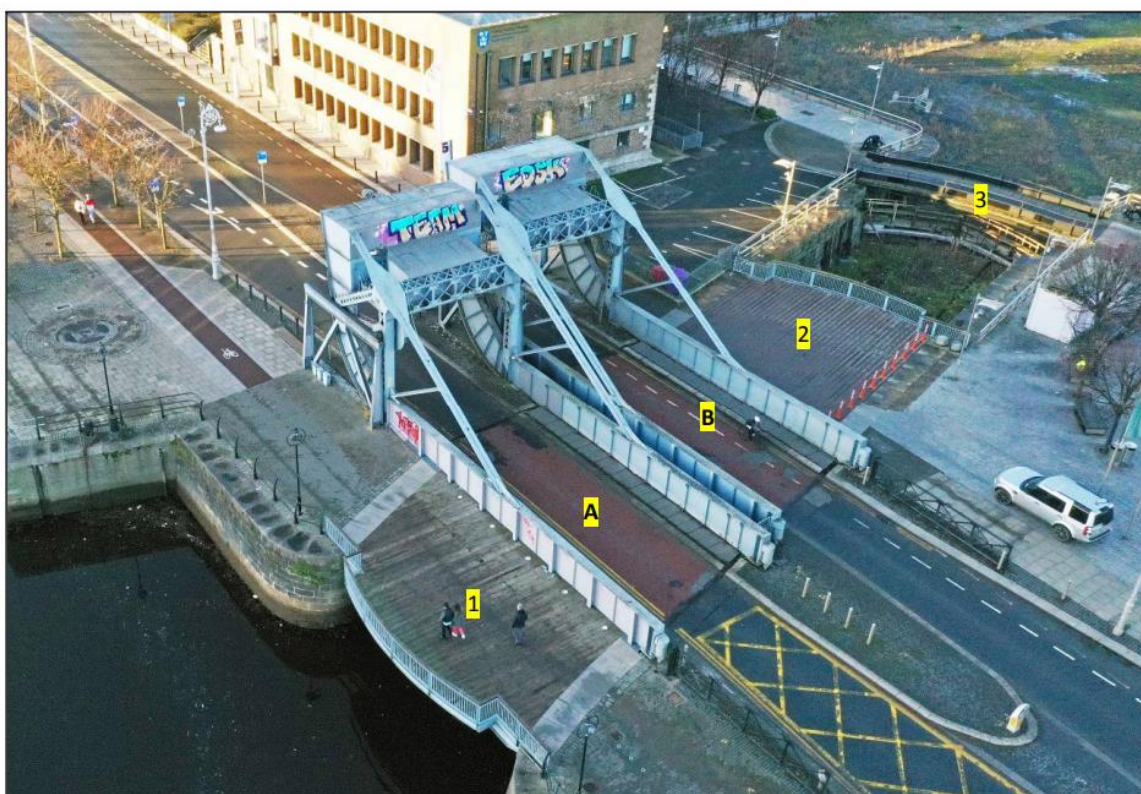


Fig 6.9 Aerial view of modern bridges over the entrance to George's Dock, from SE, 2021. Key: A - Outer Scherzer; B - Inner Scherzer; 1 - Modern foot bridge; 2 - Modern footbridge; 3- Vehicle access bridge.

There is a lot more space available on the eastern side where the bridge opening machinery can be comfortably accommodated. With the proposed reorientation of the lifting bridges it will be easier for people to see and appreciate the mechanical elements of the bridge opening mechanism as a public display of the heritage feature and how it used to operate.

For the proposed works at the river Liffey quay walls for the boardwalks the requirements for a Conservation Impact Statement and Method Statement are outlined in EIAR Volume 2, Chapter 15, Section 15.5.1.1.1, and these are included as a proposed mitigation measure ACH7 and ACH12 in Chapter 22 of the EIAR.

Per Cent for Art Scheme

Issue Raised in DCC Submission

The DCC submission (on page 51) is as follows:

“It is not clear where the Percent for Art Strategy is to be Incorporated into this project.”

Response to Issue Raised in DCC Submission

NTA will continue the very positive and constructive liaison with DCC City Architect’s Department throughout the procurement and construction process including consideration of the provision of potential items of public art where appropriate.

Water Drinking Fountains

Issue Raised in DCC Submission

The DCC submission (on page 51) describes a recently adopted new policy to provide public drinking water fountains across the city, which could potentially be included in the Proposed Scheme.

Response to Issue Raised in DCC Submission

The NTA can liaise further with DCC on this matter to explore the possibility of inclusion of public drinking water fountains in the Proposed Scheme where appropriate.

Gantry Signage

Issue Raised in DCC Submission

The DCC submission (on page 51) describes an apparent discrepancy in EIAR Chapter 4, Section 4.6.10 that says, “no new gantry signage is included in the Proposed Scheme”, with reference to proposals for traffic signals on gantry poles at various locations in Conservation Areas.

Response to Issue Raised in DCC Submission

There is a misunderstanding of terminology in relation to this issue. Gantry signs are large features with elevated frames supporting information panels such as may be seen in the example below on East Wall Road. These features are common on motorways, but they are rarely used on normal urban streets where they would be inappropriately visually intrusive.

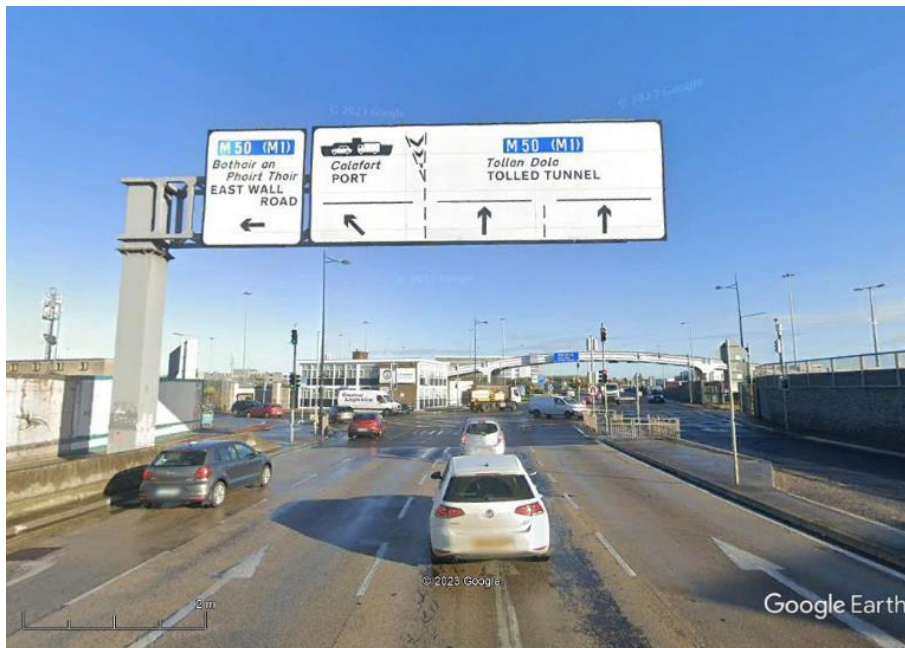


Figure 2-9-11: Example of a gantry sign which will not be provided on the Ringsend CBC Scheme in BusConnects

On the other hand traffic signal gantry poles are much smaller and visually discreet (similar to lamp posts and other normal street furniture), and they are commonly used throughout the city, especially on wider streets with four or more traffic lanes so as to ensure that drivers in the centre lanes can properly see the traffic signals. In recent years as central traffic islands have been removed from many streets, gantry signal poles have been installed to ensure suitable visibility of the signals for road safety reasons, as shown in the example in Figure 2-9-12. There is therefore no discrepancy in the EIAR on this matter.



Figure 2-9-12: Example of a gantry traffic signal in Donnybrook (Google Earth)

Interactions with Other Planned Infrastructure Projects

Issue Raised in DCC Submission

The DCC submission (on page 52) lists 6 other planned infrastructure projects in the vicinity of the Proposed Scheme:

- i. North and South Campshires Public Realm Scheme (east of Samuel Beckett Bridge
- ii. Blood Stoney Road to New Wapping Street Pedestrian Bridge Scheme.
- iii. Liffey Cycle Route (which is included within the Proposed Scheme over a 2km length).
- iv. Tom Clarke East Link Bridge Widening and adjoining Point Footbridge Scheme.
- v. East Wall Road and 3-Arena Junction Upgrade Scheme.
- vi. Poolbeg Strategic Development Zone (SDZ).

Response to Issue Raised in DCC Submission

NTA is aware of all these schemes, as funding agency for many of them, and where possible the Proposed Scheme has been designed to integrate with those other schemes in so far as they are sufficiently well advanced for this purpose. There has been extensive consultation and liaison between NTA and DCC in this regard, and that will continue as the designs of those other schemes are developed further.

St. Patrick's Rowing Club House Building

Issue Raised in DCC Submission

The DCC submission (on page 52) seeks further information on the elevation treatment and materials for the proposed club house building.

Response to Issue Raised in DCC Submission

The design of the proposed new rowing club building was developed by Sean Harrington Architects and involved extensive liaison with Dublin City Council City Architect's Department. Elevations for the proposed building are shown in EIAR Volume 3 Figures, Chapter 4 Proposed Scheme Description, Part 18 Structures in drawing No.BCID-SHA-STR_ZZ-0016_XX_00-DR-SS-0003 as shown in the snapshot in Figure 2-9-13 below.



Figure 2-9-13: Elevations Drawing for the Boathouse as included in the Scheme Application

Liaison with DCC City Architect's Department

The NTA notes the general comments on the Proposed Scheme in this section and the recommendations in the Appendix. NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC City Architects Department comments as these matters were the subject of extensive liaison throughout the design development process. NTA will continue the very positive and constructive liaison with DCC throughout the procurement and construction process.

2.4.6 City Parks, Biodiversity and Landscape Division

Pages 52 to 53 of the DCC submission refers to the following aspects of the Proposed Scheme:

- The cycle route through Ringsend Park.
- Green areas along local streets in Irishtown.

Cycle Route through Ringsend Park

Issue Raised in DCC Submission

The DCC submission expresses concern about the suitability of routing the proposed cycle route through Ringsend Park, the necessity to widen the existing path in proximity to playing pitches, and the potential impact for tree root systems.

Response to Issue Raised in DCC Submission

NTA consulted with the Parks Division when developing the proposals for the cycle route through Ringsend and Irishtown. While there is a network of quiet local streets in this part of the city, they are disjointed and disconnected from each other such that it would not be possible to develop an alternative quiet streets cycle route that would not involve a section of the busy Irishtown Road and the centre of Ringsend Village where there is extensive on-street parking. The most direct and attractive cycle route is via Ringsend Park, and this was indicated in the Greater Dublin Area Cycle Network Plan adopted by NTA in 2013 and in the current Cycle Network Plan adopted in 2022.

Other parks in Dublin have cycle routes through them, with examples in Fairview Park, Tolka Valley Park, Dodder Valley Park, Booterstown/Blackrock Park, Clonkeen Park and Kilboggett Park. Many of those cycle routes have shared surfaces, that are typically 4m wide, and operate on the principle of pedestrian priority. In Fairview Park DCC has erected advisory signs asking users to "Share with Care". The proposal for Ringsend Park in the CBC Scheme is to widen the existing footpath to 4m wide, away from the playing pitches and towards the trees. There are well established construction techniques that allow such paths to be located over tree root zones without endangering the health of the trees. A recent example is the new cycle path constructed in Booterstown Park by Dun Laoghaire-Rathdown County Council.

The nature and intensity of activities on a shared path in a public park will vary throughout the day. Commuter cyclists will be concentrated in the early morning and evening periods when other usage will be low. During the middle of the day and at weekends there will be more recreational activity in the park, when cyclists will be on recreational rather than commuting trips. This proposed all-purpose active travel route is therefore entirely compatible with the other park uses, as is clearly evident in the many existing examples at other parks listed above.

Green Verges along local streets in Irishtown

Issue Raised in DCC Submission

The DCC submission states a preference for the cycle route to follow quiet local streets in Irishtown rather than to construct a new cycle track in existing grass verges.

Response to Issue Raised in DCC Submission

The objective for the proposed cycle route is to form part of the *East Coast Trail* as envisaged in the Greater Dublin Area Cycle Network Plan with segregation from traffic as much as possible. In EIAR Volume 2, Chapter 3 *Consideration of Reasonable Alternatives*, Section 3.4.1.3.1 Section 3 Cycling Facilities through Ringsend and Irishtown there are 4 options described for the cycle route:

Option A – EPR proposal for a cycle track along the verge at York Road and Pigeon House Road and along the eastern edge of Ringsend Park

Option B – Shared running on-road on Pigeon House Road

Option C – Alternative routing via the western side of Ringsend Park; and

Option D – Combination of Option B and Option C.

A further quiet streets option would not be feasible as the network of quiet local streets in Irishtown, many of which are narrow and one-way, is disjointed and disconnected such that a very indirect route would result if that alternative were adopted. Option D was preferred as the most direct route for cyclists. There are large areas of wide grass verge in this area, and the impact of the proposed cycle track would be minimal in terms of loss of green area. In the Strand Street and Pembroke Street area of Irishtown there are extensive areas of grass verge with many groups of mature trees. Strand street is very narrow, and Pembroke Street carries one-way traffic in the southbound direction. For northbound cyclists from the Sean Moore Road direction it is not feasible to use the local streets against the one-way traffic on the wrong side of the road, and a segregated cycle track is therefore necessary. In that context the most reasonable and practical arrangement is to provide a segregated two-way cycle track in the generally wide verge area. The alignment of the proposed cycle track has been designed to avoid existing stands of trees and to minimise severance of the green areas as much as possible by following the edges.

2.5 Overall Conclusion by Dublin City Council

In Section 2.5 on pages 53 and 54 of the submission Dublin City Council is supportive of the Proposed Scheme and states the following:

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

Appendix 1 - Recommended Conditions

DCC has set out a number of suggested conditions that An Bord Pleanála should attach to a planning consent. NTA provides responses to each of the proposed conditions.

“Proposed Condition 1:

That a comprehensive agreement is put in place between DCC and the NTA regarding how the corridor is to be handed over to the NTA and its contractors, what pre-inspection and recording of the corridor is necessary and how the corridor is to be maintained during construction activities and by whom. The agreement shall also address the hand-back process, the treatment of all relevant records treated and how the corridor is to be accepted back by DCC following construction.”

NTA Response

Under the provisions of the relevant legislation, the NTA has exercised certain powers under Section 44(2)(b) of the 2008 Act to the effect that the functions in relation to securing the provision of public transport infrastructure falling within Section 44(2)(a) of the 2008 Act (as amended) in relation to the CBC Infrastructure Works, should be performed by the NTA. Those functions include the design and construction of the Proposed Scheme and, effectively, the NTA becomes the road authority in respect of the exercise of those functions.

Under the relevant legislation, upon the completion of the construction of the Proposed Scheme the NTA automatically ceases to be the road authority and the status of DCC as the relevant road authority is automatically restored – it does not require the operation of the conventional “taking-in-charge” arrangements provided for elsewhere in legislation. Accordingly, the legislative provisions appropriately govern the arrangements for the NTA to commence the construction of the Proposed Scheme, subject to the necessary planning and environmental consents, and govern the restoration of the road authority function to the relevant local authority, in this case being Dublin City Council.

Notwithstanding the above, the NTA intends to continue the close liaison with DCC that has been in place during the planning and design stage of the Proposed Scheme, during and throughout the subsequent construction stage. This will include engaging and collaborating on the construction arrangements, the road maintenance arrangements during construction and the standard to which the Proposed Scheme will be completed prior to transfer back to DCC, together with record retention, all in full accordance with the EIAR. Given the legislative framework that is in place, these are matters that can, and will, be successfully addressed between DCC and the NTA, in the absence of any approval condition.

“Proposed Condition 2:

Following hand-back, a separate agreement shall be put in place between DCC and the NTA regarding the costs of maintenance of the corridor as a high quality public transport corridor with agreed levels of performance and how the performance of the public transport corridor is not eroded in the future.”

This proposed condition seeks the enactment of an agreement between DCC and the NTA, subsequent to the completion of the construction of the Proposed Scheme, addressing issues related to maintenance costs.

The Proposed Scheme upon its completion reverts to the status of a public road under the management of the relevant local authority, in this case Dublin City Council. The funding of costs associated with the maintenance of public roads can involve a number of parties depending on the status of the road – for instance, in the case of a national road Transport Infrastructure Ireland would have an involvement. As the Proposed Scheme does not encompass any section of national road, its components constitute regional and/or local roads only. Funding of regional and local roads fall under the ambit of the relevant local authority and the Department of Transport.

The Exchequer does not currently provide the NTA with funds for dispersal to local authorities for maintenance activities and the NTA does not have a role in overseeing or organising general public road maintenance activities. However, the NTA does retain responsibility for bus fleet, bus stops and bus shelters, and maintenance of these elements falls within its remit.

The NTA agrees with the objective stated in the draft condition, namely, to ensure “maintenance of the corridor as a high quality public transport corridor with agreed levels of performance”. To achieve that objective, the NTA anticipates continuing its collaboration with DCC to ensure the delivery of an appropriate maintenance regime. As part of this collaboration, the NTA will support the provision of the necessary funding by the relevant parties to ensure that the benefits of the Proposed Scheme are not inappropriately eroded. These are matters that can be successfully addressed between DCC and the NTA, in the absence of any approval condition.

“Proposed Condition 3:

All relevant DCC departments involved with the development of the Scheme shall be consulted during the detailed design development process for the Scheme and the NTA shall seek, to the extent practicable, to incorporate the requirements of the DCC departments into the final detailed design of the Scheme.”

The NTA acknowledges the close liaison with DCC that has been in place during the planning and design stage of the Proposed Scheme, which included extensive dialogue with the relevant sections within the Council. The Proposed Scheme as submitted to An Bord Pleanála has properly considered, and taken into account, the inputs from those sections during the design development process.

It is the intention of the NTA that this collaboration will continue both in advance of, and during, the subsequent construction stage of the Proposed Scheme. This will include continued liaison with the relevant sections of the Council and taking their requirements into consideration, where aligned with and consistent with the EIAR. These are matters that can be successfully addressed between DCC and the NTA, in the absence of any approval condition.

Department Recommendations / Conditions

Roads Division Standard Conditions

Roads Division

The proposed conditions extend over Pages 55 to 57 of the DCC Submission and covers numerous items including existing conditions records, design, reinstatement, construction period and miscellaneous matters.

Response: In regard to the Recommendations/Conditions the NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Roads Division inputs as these matters were the subject of extensive liaison throughout the design development process.

Public Lighting Recommendations / Conditions

The Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Public Lighting Department inputs regarding the required light level design and the relevant EN certification as these matters were the subject of extensive liaison throughout the design development process.

Environmental Protection Division Recommendations / Conditions

In regard to the Recommendations/Conditions of the Environmental Protection Division set out in the Appendix NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Environmental Protection Division inputs regarding criteria and processes as these matters were the subject of extensive liaison throughout the design development process.

Air and Noise Pollution Control Unit Recommendations / Conditions

Chapter 7 (Air Quality) and Chapter 9 (Noise and Vibration) in Volume 2 of the EIAR, both contain an assessment of the potential air and noise impacts which could arise from the construction of the

Proposed Scheme (the construction strategy is set out in Chapter 5 in Volume 2 of the EIAR). Chapters 7 and 9 also contain comprehensive suite of measures to mitigate the potential air and noise impacts which could arise from the construction of the Proposed Scheme. These mitigation measures broadly align with the 'good practice' measures set out in the DCC Air Quality Monitoring and Noise Control Unit's Good Practice Guide for Construction and Demolition. These mitigation measures are also contained within the Construction Environmental Management Plan in Appendix A5.1 in Volume 4 of the EIAR.

Archaeology Department Recommendations / Conditions

1. Industrial Heritage

As earlier addressed in Section 2.4.3 of this response document, the NTA is satisfied that the EIAR provides a comprehensive evaluation of the proposals for the Scherzer bridges and requires no update for a revised proposal to retain these bridges in their current locations which would significantly weaken the essential public transport priority provisions along the north quays.

2. Public Artwork

Sufficient provisions are included in the EIAR to protect all cultural heritage and artwork features.

3. The NTA notes the recommendation set out in the Appendix by the Archaeology Department and has set out in the EIAR the intention to appoint a Project Archaeologist.

In Section 15.5.1.1 in Chapter 15 (Archaeological and Cultural Heritage) it states that:

"The NTA will procure the services of a suitably-qualified archaeologist as part of its Employer's Representative team administering and monitoring the works. The appointed contractor will make provision for archaeological monitoring to be carried out under licence to the DHLGH and the NMI, and will ensure the full recognition of, and the proper excavation and recording of, all archaeological soils, features, finds and deposits which may be disturbed below the ground surface."

Section 15.5.1.1.1 addresses archaeological management.

"An experienced and competent licence-eligible archaeologist will be employed by the appointed contractor to advise on archaeological and cultural heritage matters during construction, to communicate all findings in a timely manner to the NTA and statutory authorities, to acquire any licenses/ consents required to conduct the work, and to supervise and direct the archaeological measures associated with the Proposed Scheme.

Licence applications are made by the licence-eligible archaeologist on behalf of the client to the National Monuments Service at the DHLGH. In addition to a detailed method statement, the applications must include a letter from the client on client letterhead that confirms the availability of adequate funding. There is a prescribed format for the letter that must be followed. Other consents may include a Detection Device licence to use a metal detector or to carry out a non-invasive geophysical survey.

A construction schedule will be made available to the archaeologist, with information on where and when the various elements and ground disturbance will take place. As part of the licensing requirements, it is essential for the client to provide sufficient notice to the archaeologist/s in advance of the construction works commencing. This will allow for prompt arrival on site to undertake additional surveys and to monitor ground disturbances. As often happens, there may be down time where no excavation work is taking place during the Construction Phase. In this case, it will be necessary to inform the archaeologist/s as to when ground breaking works will recommence.

In the event of archaeological features or material being uncovered during the Construction Phase, all machine work will cease in the immediate area to allow the archaeologist/s time to inspect and record any such material.

Once the presence of archaeologically significant material is established, full archaeological recording of such material is recommended. If it is not possible for the construction works to avoid the material, full excavation will be recommended. The extent and duration of excavation will be advised by the client's archaeologist and will be a matter for discussion between the client and the licensing authorities.

Secure storage for artefacts recovered during the course of the monitoring and related work will be provided.

As part of the licensing requirement and in accordance with the funding letter, adequate funds to cover excavation, post-excavation analysis, and any testing or conservation work required will be made available..."

The Archaeology Section requests that there is publication and/or dissemination as appropriate of the archaeological results of the project and that the Archaeology Section is copied with all Section 26 method statements and any reports arising and provide regular updates on finds and mitigation.

The Archaeology Section also recommends that the primary archaeological paper archive for all archaeological site investigations be prepared and deposited with the Dublin City Archaeological Archives within a timeframe to be agreed with the planning authority. The NTA will liaise with DCC in regard to archival processes.

Conservation Department Recommendations / Conditions

In regard to the recommended measures relating to Conservation Issues in the Appendix, the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Conservation Department comments and recommendations as these matters were the subject of extensive liaison throughout the design development process. These issues are addressed within the planning application documents as follows:

1. Safeguarding of Architectural Heritage

The NTA note the recommendation / condition in respect to safeguarding "the special architectural interest of affected Architectural Heritage across the BusConnects routes – including Protected Structures and Conservation Areas, landscaping, historic paving, setts, kerbing and associated features, boundary treatments, historic street furniture, gardens and trees and historic public realm etc. – and to ensure that the proposed works will be carried out in accordance with best conservation practice with no unauthorised or unnecessary damage or loss of historic fabric, the Conservation Section recommend that all works shall be designed and supervised by an expert in architectural conservation in accordance with the provisions (outlined above) of the Dublin City Development Plan 2022-2028, the 'Architectural Heritage Protection Guidelines for Planning Authorities (2011)' and relevant documents of the DHLGH Advice Series."

This recommendation / condition is in line with the mitigation measures set out in Section 16.5 of Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR where it is stated that an architectural heritage specialist will oversee the recording, protection and monitoring of various heritage assets / features as well as sensitive fabric prior to, and for the duration of the construction phase of the Proposed Scheme in accordance with the methodology provided in Appendix A16.3 (Methodology for Works Affecting Sensitive and Historic Fabric) in Volume 4 of the EIAR. Appendix A16.3 (Methodology for Works Affecting Sensitive and Historic Fabric) states in Section 1.1.1:

"Where conservation works to features are required as a result of the construction of the Proposed Scheme it will be carried out by the Contractor in accordance with the principles of the Venice and Burra Charters produced by ICOMOS Australia in 1979 and amended in 1981, 1988, 1999 and 2013. The Contractor will also adhere to the conservation principles set out in the Department of the Environment, Heritage and Local Government's Protection Guidelines for Planning Authorities (2011) and the Department's advice series publications on various elements."

2. Specific Measures in relation to various elements of the Proposed Scheme

Responses to the specific recommendations / conditions as outlined by the DCC Conservation Section are outlined below:

a. *“Revision of the proposed scheme to provide for the retention-in situ of the two pairs of Scherzer Bridges at George’s Dock (DCC RPS 896) and the Royal Canal (DCC RPS 912), which are Protected Structures, and/or other such redesign to minimise the physical and visual impact on the rare metal bridges. Details to be submitted for written approval of the Planning Authority in advance of works commencing.”*

The NTA does not agree with this recommendation as options for the Scherzer Bridges were considered and determined as outlined in the Preferred Route Option Report and as described earlier in Section 2.4.3 of this submission response.

As such, the Archaeology Assessment (Chapter 15 in Volume 2 of the EIAR) and Architectural Heritage Assessment (Chapter 16 in Volume 2 of the EIAR) are based on the Proposed Scheme as designed, which includes for the separation of both pairs of Scherzer Bridges to facilitate four-lanes of traffic (inclusive of two bus lanes).

It should be noted that the Archaeology Assessment (Chapter 15 in Volume 2 of the EIAR) only assesses the ground-breaking and reduction works that are required to take place in order for both pairs of Scherzer Bridges to be separated. Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR considers and assesses the proposed intervention, the required repair works, and the relocation of the Scherzer Bridges.

As is correctly stated in the submission from the DCC Archaeology Section, Chapter 15 (Archaeology) in Volume 2 of the EIAR assesses the pre-mitigation impact of these ground breaking and reduction works associated with the Scherzer Bridges at both locations as “Negative, Significant and Permanent”. As such, mitigation is proposed in order to reduce this potential effect. The proposed mitigation measures are set out in Section 15.5 of Chapter 15 (Archaeology) in Volume 2 of the EIAR. In particular respect to the proposed works at both pairs of Scherzer Bridges, the following mitigation measures are to be implemented:

- Archaeological monitoring under licence (by a suitably qualified archaeologist) will take place where any preparatory ground breaking or ground reduction works are required;
- Licensed archaeological excavation, in full or in part, of any identified archaeological remains (preservation by record) or preservation in-situ will be undertaken. Once these strategies are employed, this will result in any archaeological remains being identified, recorded and excavated out of the ground or being left in-situ as a design solution with the result that there will be no significant impact post mitigation; and
- The appointed contractor will ensure that a full and complete photographic and detailed industrial heritage record survey is undertaken (the scope of the record survey will be identified through liaison between the appointed contractor and the archaeologist and architectural heritage specialist engaged by the appointed contractor).

Similarly, Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR assesses the pre-mitigation impact of the proposed intervention, the required repair works, and the relocation of the Scherzer Bridges as “Negative, Moderate and Permanent”. As such, mitigation is proposed in order to reduce this potential effect. The proposed mitigation measures are outlined in Section 16.5 of Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR. In particular respect to the proposed works at both pairs of Scherzer Bridges, the following mitigation measures are to be implemented:

- Pre-construction surveying, condition assessments and recording of the structures prior to their careful dismantling is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor. This is to inform the repair, interpretation and subsequent reassembly of the Scherzer Bridges;
- The architectural heritage specialist will then oversee the protection, labelling, safe storage, repair and reinstatement of the bridges, the affected kerbs, winches, and historic masonry. The affected quay walls (DCC RPS 3173) fabric will be made available by the appointed contractor to the local authority for salvage or reuse. Works to historic fabric

will be carried out 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 the EIAR; and

- The Scherzer Bridges will be restored and relocated to new positions where they will accommodate pedestrians and cyclists crossing the canal.

Given the aforementioned proposed mitigation measures in respect to the required ground breaking and reduction works as well as the repair works and the relocation of the Scherzer Bridges at both locations, the archaeological and architectural heritage assessments of the Proposed Scheme concluded “no significant impact” resulting from such works.

In specific regard to potential effects on the visual / historic setting of both pairs of Scherzer Bridges, such potential effects are considered and assessed in Section 17.4.4.1.1 of Chapter 17 (Landscape (Townscape) & Visual) in Volume 2 of the EIAR. Within this section it is stated that:

“While the changes (brought on by the Proposed Scheme) will not alter the overall townscape character along this section of the proposed Scheme, the Scherzer Bridges are important features of the road corridor and urban realm. The separation and repositioning of the structures within an altered high quality urban realm / landscape setting will retain the visual relationship of the structures with their original siting but negates their historic lifting bridge function on the main carriageway.”

This section within Chapter 17 (Landscape (Townscape) & Visual) in Volume 2 of the EIAR goes on to conclude that together with the provision of high quality stone paving, replacement and new tree planting along sections of the north quays as well as the improved accessibility and new vantage points with the provision of the pedestrian boardwalks along Custom House Quay and North Wall Quay, the significance of these changes along this section of the Proposed Scheme will reduce over time as they become more accepted elements of the townscape and as replacement and new planting matures. As such, the potential effect on townscape / streetscape on this section of the Proposed Scheme during the operational phase is assessed as Neutral, Moderate and Short-term, becoming Neutral, Slight / Moderate and Long-term.

Potential effects on the sea locks (and their setting) at the Royal Canal underneath the Scherzer Bridges at this location are considered and assessed in Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR. Potential effects on the sea locks at the Royal Canal are assessed as Negative, Slight and Long-term.

Similarly, the quay walls at Britain Quay and Thorncastle Street are also considered and assessed in Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR. Potential effects on these features are assessed as Negative, Slight and Permanent, respectively.

b. *“An architectural heritage impact assessment to be undertaken by a suitable qualified conservation professional for all proposed alterations to the Scherzer Bridges and quay walls, outlining the nature and likely impacts and proposals to minimise the impacts on the historic fabric, to be submitted for the written approval of the Planning Authority in advance of works commencing.”*

Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR sets out the consideration and assessment of potential effects on architectural heritage as a result of the Proposed Scheme. Potential effects on features of architectural heritage significance, including historic fabric, are identified and assessed in this chapter, with mitigation measures proposed as necessary.

c. *“An architectural heritage impact assessment for the boardwalk elements and proposals to reduce the impacts on the historic fabric to be submitted for the written approval of the Planning Authority in advance of works commencing.”*

Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR sets out the consideration and assessment of potential effects on architectural heritage as a result of the Proposed Scheme. Potential effects on features of architectural heritage significance, including historic fabric, are identified and assessed in this chapter, with mitigation measures proposed as necessary.

d. *“An architectural heritage impact assessment for the proposed site compounds, including proposals to reduce their impacts on the historic fabric, to be submitted for the written approval of the Planning Authority in advance of works commencing.”*

Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR sets out the consideration and assessment of potential effects on architectural heritage as a result of the Proposed Scheme. Potential effects on features of architectural heritage significance, including historic fabric, are identified and assessed in this chapter, with mitigation measures proposed as necessary. The following mitigation, as outlined in Section 16.5.1.5.2 in Chapter 16 in Volume 2 of the EIAR, is proposed in regard to all construction activities including the establishment and operation of construction compounds during the construction phase:

“The architectural heritage specialist will oversee the recording, protection and monitoring prior to, and during, the Construction Phase. Works to historic fabric will be carried out 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 the EIAR.”

e. *“Full details of the design and type and location of each bus shelter / stop along the proposed route in front of Protected Structures and structure on the NIAH to be submitted to and agreed in writing with the Planning Authority in advance of works commencing.”*

The location of each bus shelter / stop along the Proposed Scheme are shown on the General Arrangement Drawings (Chapter 4 Figures) in Volume 3 of the EIAR. Details on the design of these bus stops are outlined in Section 4.6.4.5 of Chapter 4 (Proposed Scheme Description) in Volume 2 of the EIAR. Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR considers and assesses the location of bus shelters / stops in proximity to Protected Structures and structures on the NIAH (see Section 16.4.4.1 of Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR). It concludes that the potential effects of bus shelters on Protected Structures is considered to be Neutral and Long-term.

f. *“Consideration to be given for the omission of bus shelters in front, and in the immediate vicinity, of Protected Structures across the route and for bus stops only to be provided at these locations, in order to minimise visual clutter and protect the special architectural character of Protected Structures. Details to be confirmed in writing to the Planning Authority in advance of works commencing.”*

As set out in Section 16.5.2 of Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR, consideration has been given to the location of existing and proposed bus stops, bus shelters and signal pole locations during the design development of the Proposed Scheme. This consideration was undertaken to avoid impacting on the setting of identified sites, buildings and features. It concludes that the potential effects of bus shelters on Protected Structures is considered to be Neutral and Long-term.

g. *“Consideration to be given to the rationalisation of all traffic infrastructure such as signage, traffic poles, utility boxes, etc. across the route to reduce visual clutter, in particular in the vicinity of Protected Structures, within red-hatched conservation areas and in residential conservation areas.”*

The location of traffic infrastructure such as signage, traffic poles, utility boxes, etc. are shown in the Chapter 4 suite of figures in Volume 3 of the EIAR. Consideration and rationalisation of such infrastructure was undertaken as part of the design development of the Proposed Scheme. Section 16.5.2 of Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR sets out the assessment of potential effects on architectural heritage resulting from the operational phase of the Proposed Scheme, including all elements in which it comprises.

h. *“Consideration to be given to the omission of gantry traffic signage in the vicinity of Protected Structures, within Conservation Areas, red-hatched conservation areas and residential conservation areas and alternative traffic signage solutions should be sought.”*

No gantry traffic signage are proposed as part of the Proposed Scheme.

- i. *“Where cycle ways are located in close proximity to Protected Structures and within Conservations Areas generally, consideration shall be given to an alternative high quality cycle land surface in-lieu of red tarmacadam.”*

Localised changes to cycle lane surfacing at specific buildings is impractical. The Ringsend Scheme is not in a Conservation Area, and the cycle tracks are located generally along the campshires of the River Liffey on the opposite side of the street from the buildings and therefore will not be close to protected structures.

- j. *“The alignment of footpaths should respect the setting of Protective Structures and buildings of National importance.”*

The Proposed Scheme will not alter the alignment of existing footpaths along the route, apart from a small number of places where they will be widened into the road such as at Custom House Quay just west of George’s Dock. This specific recommendation as outlined by the DCC Conservation Section is not applicable to the Proposed Scheme.

3. *“The conservation professional shall ensure adequate protection of the retained and historic fabric during the proposed works and across all preparatory and construction phases. In this regard, all works shall be designed to cause minimum interference to historic fabric.”*

This recommendation / condition is in line with the mitigation measures set out in Section 16.5 of Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR where it is stated that an architectural heritage specialist will oversee the recording, protection and monitoring of various heritage assets / features as well as sensitive fabric prior to, and for the duration of the construction phase of the Proposed Scheme in accordance with the methodology provided in Appendix A16.3 (Methodology for Works Affecting Sensitive and Historic Fabric) in Volume 4 of the EIAR. This appendix states in Section 1.1.1:

“Where conservation works to features are required as a result of the construction of the Proposed Scheme it will be carried out by the Contractor in accordance with the principles of the Venice and Burra Charters produced by ICOMOS Australia in 1979 and amended in 1981, 1988, 1999 and 2013. The Contractor will also adhere to the conservation principles set out in the Department of the Environment, Heritage and Local Government’s Protection Guidelines for Planning Authorities (2011) and the Department’s advice series publications on various elements.”

4. *“In accordance with best conservation practice, specifications and method statements for the careful and sensitive relocation and reinstatement of historic fabric identified in the report above, and in particular to Protected Structures, sites / structures on the NIAH and DCIHR, and structures and features in Architectural Conservation Areas (ACAs) across the BusConnects route shall be submitted by the conservation professional for the written approval of the Planning Authority in advance of works commencing.”*

This recommendation / condition is in line with the mitigation measures set out in Section 16.5 of Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR where it is stated that an architectural heritage specialist will oversee the recording, protection and monitoring of various heritage assets / features as well as sensitive fabric prior to, and for the duration of the construction phase of the Proposed Scheme in accordance with the methodology provided in Appendix A16.3 (Methodology for Works Affecting Sensitive and Historic Fabric) in Volume 4 of the EIAR. This appendix states in Section 1.1.1:

“Where conservation works to features are required as a result of the construction of the Proposed Scheme it will be carried out by the Contractor in accordance with the principles of the Venice and Burra Charters produced by ICOMOS Australia in 1979 and amended in 1981, 1988, 1999 and 2013. The Contractor will also adhere to the conservation principles set out in the Department of the Environment, Heritage and Local Government’s Protection Guidelines for Planning Authorities (2011) and the Department’s advice series publications on various elements.”

5. "The conservation professional shall advise the Conservation Section on architectural heritage and conservation matters that may have further impacts on the project throughout the construction phases."

This recommendation / condition is in line with the mitigation measures set out in Section 16.5 of Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR where it is stated that an architectural heritage specialist will oversee the recording, protection and monitoring of various heritage assets / features as well as sensitive fabric prior to, and for the duration of the construction phase of the Proposed Scheme in accordance with the methodology provided in Appendix A16.3 (Methodology for Works Affecting Sensitive and Historic Fabric) in Volume 4 of the EIAR. This appendix states in Section 1.1.1:

"Where conservation works to features are required as a result of the construction of the Proposed Scheme it will be carried out by the Contractor in accordance with the principles of the Venice and Burra Charters produced by ICOMOS Australia in 1979 and amended in 1981, 1988, 1999 and 2013. The Contractor will also adhere to the conservation principles set out in the Department of the Environment, Heritage and Local Government's Protection Guidelines for Planning Authorities (2011) and the Department's advice series publications on various elements."

The NTA will liaise with the DCC Conservation Section on architectural heritage and conservation matters in the event of unforeseen / unexpected issues arising that might have impacts on heritage features in the project throughout the construction phases.

6. *"If, through the course of construction work across the BusConnects routes, hitherto unknown and concealed architectural heritage fabric is found, the conservation professional shall contact the Conservation Section to advise them of the discovery as the presence of historic fabric may inform an alternative strategy for a design proposal that would enhance the setting of a Protected Structure, other historic buildings and features, or Conservations Area."*

As stated in Section 16.5.1 in Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR, proposed mitigation measures for architectural heritage features are outlined and detailed in Appendix A16.3 (Methodology for Works Affecting Sensitive and Historic Fabric) in Volume 4 of the EIAR, which includes amongst other measures, the appointment of an architectural heritage specialist to oversee construction works prior to and during the construction phase. The NTA agree for the conservation professional to contact the DCC Conservation Section as necessary during the construction phase of the Proposed Scheme.

The NTA will liaise with the DCC Conservation Section on architectural heritage and conservation matters in the event of unforeseen / unexpected issues arising that might have impacts on heritage features in the project throughout the construction phases.

7. *"All works shall be carried out in accordance with best conservation practice, the Architectural Heritage Protection Guidelines for Planning Authorities (2011) and the Advice Series issued by the Department of the Housing, Local Government and Heritage. All repair works shall retain the maximum amount of surviving historic fabric in situ. Items to be removed for repair off-site shall be recorded prior to removal, catalogued and numbered to allow for authentic re-instatement."*

This recommendation / condition is in line with the mitigation measures set out in Section 16.5 of Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR where it is stated that an architectural heritage specialist will oversee the recording, protection and monitoring of various heritage assets / features as well as sensitive fabric prior to, and for the duration of the construction phase of the Proposed Scheme in accordance with the methodology provided in Appendix A16.3 (Methodology for Works Affecting Sensitive and Historic Fabric) in Volume 4 of the EIAR. This appendix states in Section 1.1.1:

"Where conservation works to features are required as a result of the construction of the Proposed Scheme it will be carried out by the Contractor in accordance with the principles of the Venice and Burra Charters produced by ICOMOS Australia in 1979 and amended in 1981, 1988, 1999 and 2013. The Contractor will also adhere to the conservation principles set out

in the Department of the Environment, Heritage and Local Government's Protection Guidelines for Planning Authorities (2011) and the Department's advice series publications on various elements."

8. *"All existing original architectural heritage features, in the vicinity of the works shall be protected during the course of all phases of construction works."*

This recommendation / condition is in line with the mitigation measures set out in Section 16.5 of Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR where it is stated that an architectural heritage specialist will oversee the recording, protection and monitoring of various heritage assets / features as well as sensitive fabric prior to, and for the duration of the construction phase of the Proposed Scheme in accordance with the methodology provided in Appendix A16.3 (Methodology for Works Affecting Sensitive and Historic Fabric) in Volume 4 of the EIAR. This appendix states in Section 1.1.1:

"Where conservation works to features are required as a result of the construction of the Proposed Scheme it will be carried out by the Contractor in accordance with the principles of the Venice and Burra Charters produced by ICOMOS Australia in 1979 and amended in 1981, 1988, 1999 and 2013. The Contractor will also adhere to the conservation principles set out in the Department of the Environment, Heritage and Local Government's Protection Guidelines for Planning Authorities (2011) and the Department's advice series publications on various elements."

9. *"All repair of historic fabric shall be scheduled and carried out by appropriately experienced conservators of historic fabric."*

This recommendation / condition is in line with the mitigation measures set out in Section 16.5 of Chapter 16 (Architectural Heritage) in Volume 2 of the EIAR which outlines that an architectural heritage specialist will oversee repair work on historic fabric where necessary during the construction phase of the Proposed Scheme.

City Architects Department Recommendations / Conditions

The NTA notes the general comments on the Proposed Scheme in the recommendations in the Appendix. NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC City Architects Department comments as these matters were the subject of extensive liaison throughout the design development process.

Parks, Biodiversity and Landscape Division Recommendations / Conditions

The NTA notes the general comments on the Proposed Scheme in the recommendations in the Appendix. NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Parks, Biodiversity and Landscape Division comments as these matters were the subject of extensive liaison throughout the design development process.

2.10 Dublin Cycling Campaign

Overview of submission

This submission raised the following issues:

- i) Support for the Proposed Scheme;
- ii) Requested Modifications;

2.10.1 Support for the Proposed Scheme

The introduction of the submission outlines that the Dublin Cycling Campaign supports the Proposed Scheme, with a number of reservations.

The submission sets out that the Dublin Cycling Campaign is a registered charity that advocates for better cycling conditions in Dublin. The submission notes that the Dublin Cycling Campaign has been engaging with the NTA through all stages of the project including multiple rounds of public consultation, community forums, and through one to one meetings.

2.10.2 Requested Modifications

Summary of issue

- a) 2-way cycle tracks should be wider.
- b) Improvement required at southern end of the Beckett Bridge.
- c) Point junction improvement not in the scheme.
- d) Tom Clarke Bridge needs cycling facility and better footpath.
- e) Better alignment for cycle track at Strand Road / Irishtown Stadium.
- f) Tie-ins at Sean Moore Road and Pigeon House Road out of date with recent changes.
- g) Opportunity to widen cycle track at Docklands Centre on Custom House Quay during current redevelopment.

Response to issue

a) Width of Two-way Cycle Track

The submission expects that the 2 way cycle tracks have a desired central width of 3 metres plus inside and outside clearances.

In the Proposed Scheme there are very extensive lengths of two-way cycle tracks, and these are typically 3.0m to 3.5m wide and separated from the road by a buffer zone of varying width, which is typically 2m wide. The widths of the proposed cycle tracks are shown in EIAR Volume 3 Figures, Chapter 4 Scheme Description Part 4 Typical Cross Sections from which some examples are shown in the following images.

Full information on the widths of the facilities proposed is included in the Supplementary Information, Preliminary Design Report Table 4-2, which shows that 3.0m minimum width is generally achieved, except in very constrained circumstances where passing buildings on the north quays, where a local absolute minimum of 2.5m is achieved. The cycle track is horizontally separated from other road users where practicable. The shared path through Ringsend Park is 4.0m wide, which is the maximum that can be achieved, while protecting the existing trees and the functionality of the adjacent sports pitches.

Chapter 6 (Traffic and Transport) in Volume 2 of the EIAR and Appendix A6.1 (Traffic Impact Assessment) considers and assesses the potential effects associated with the improvements proposed as part of the Proposed Scheme for different users, namely pedestrians, cyclists, buses and general traffic.

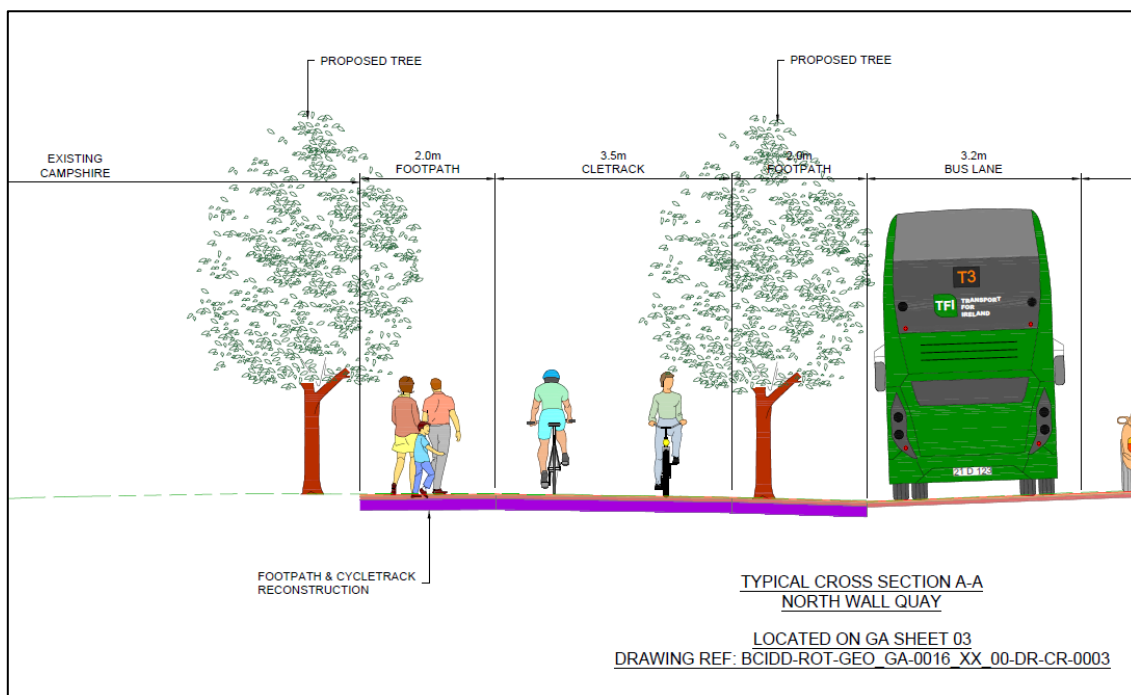


Figure2-10-1: Typical Cross-Section of Cycle Track on North Wall Quay

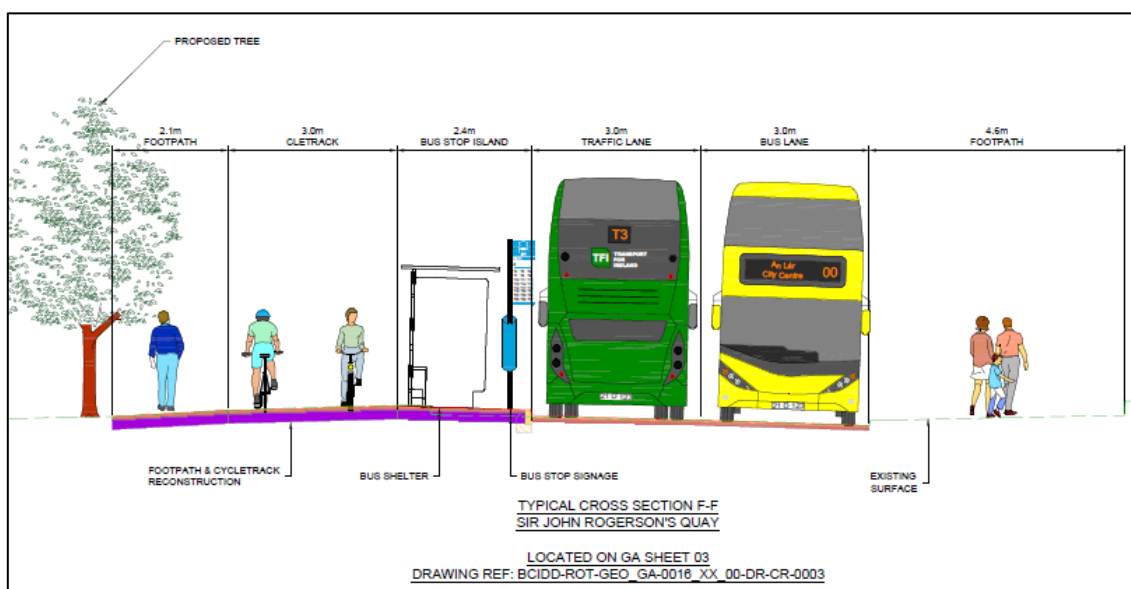


Figure 2-10-2: Typical Cross-Section of Cycle Track on Sir John Rogerson's Quay

b) Improvement required at southern end of the Beckett Bridge.

In the Proposed Scheme the footpath and cycle track area immediately east of the Samuel Beckett Bridge on the campshire of Sir John Rogerson's Quay will be widened substantially by moving the kerb 2m into the road, which will greatly increase the space available for both pedestrians and cyclists and will improve the effective segregation between the two user groups in this busy location.

In the EIAR Volume 2, Chapter 3, Consideration of Reasonable Alternatives, Section 3.4.1.1.6 describes the 3 options that were considered for cycling facilities on Samuel Beckett Bridge. To fully separate the two groups of users would require widening into the road and removal of the existing bus lane which would cause difficulties for the proposed city centre orbital bus route, and for eastbound buses heading for Ringsend. Neither would it be practicable to modify the existing arrangement on the bridge at this location where there is a major mechanical movement joint in the bridge deck that enables the bridge to swing open for river navigation. Separate proposals by DCC for a new footbridge to the east would reduce the pressure of people on the Samuel Beckett Bridge.

c) Point junction improvement not in the scheme.

Dublin City Council has separate proposals to improve this junction which is not included in the Proposed Ringsend CBC Scheme to avoid overlap of planning proposals. The Proposed Scheme will not constrain any future improvements to this junction.

d) Tom Clarke Bridge needs cycling facility and better footpath.

Dublin City Council has separate proposals to provide a new pedestrian and cycling bridge over the River Liffey parallel to the Tom Clarke Bridge on the western side.

e) Better alignment for cycle track at Strand Road / Irishtown Stadium.

The Proposed Scheme at this location is shown in the image below. There is a constraint due to a stand of trees in the verge along Strand Street which is avoided by the proposed cycle track alignment. It is also beneficial to provide a bendy alignment on this section of cycle track to control cyclists speeds as there are several interfaces with crossings of entrances, side roads and footpaths between Ringsend Park and Kerlogue Road. The cycle track transitions to a shared area at this location beside Irishtown Stadium where several desire lines converge from different directions and segregation between pedestrians and cyclists is not feasible.

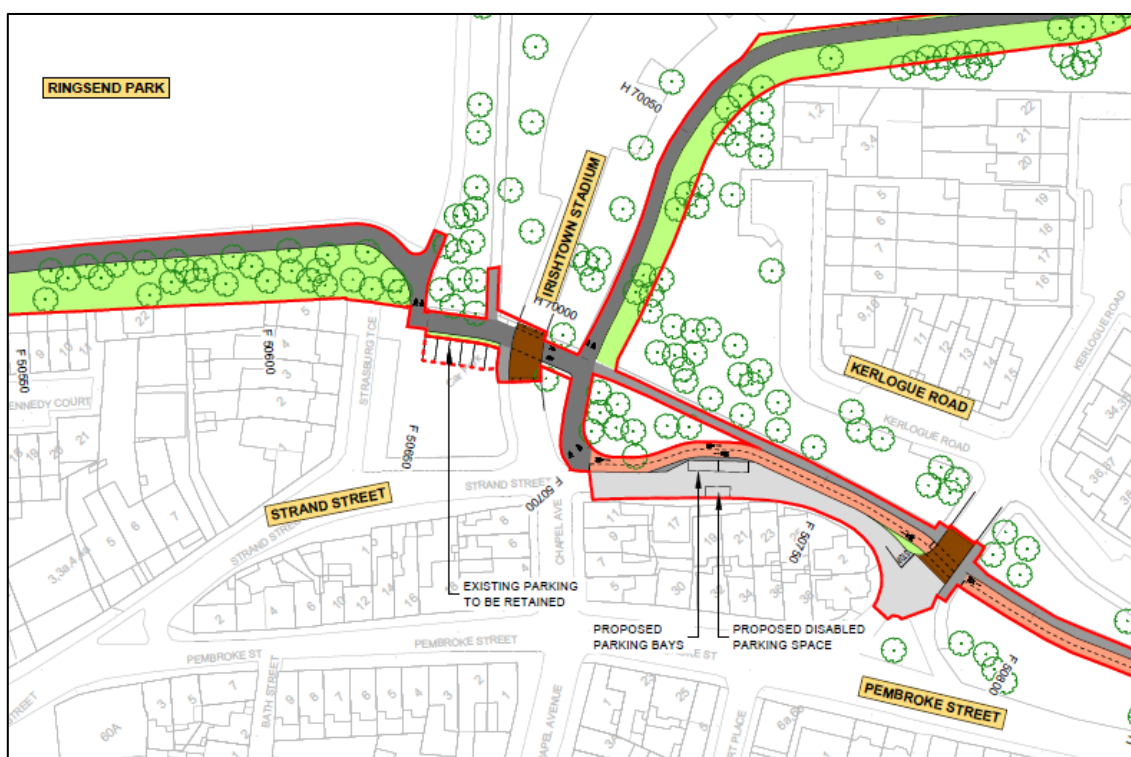


Figure 2-10-3: Extract from General Arrangement Drawing Sheet 11 at Irishtown (EIAR Volume 3 Figures, Chapter 4, Part 2)

f) Tie-ins at Sean Moore Road and Pigeon House Road out of date with recent changes.

The road layout has been recently modified at the junction of Sean Moore Road with Strand Road beside Sean Moore Park where the left-slip traffic lane was removed and replaced with a cycle track. The Proposed Scheme would require very minor adjustment to interface with the revised road and cycle track layout at this location, which can be included at the construction stage.

The reference in the submission to Pigeon House Road is to the closure of this road to through traffic at the eastern end beside the Poolbeg Quay apartments. This change has improved the suitability of Pigeon House Road for shared use by cyclists with local traffic, and the Proposed Scheme does not require any adjustments.

g) Opportunity to widen cycle track at Docklands Centre on Custom House Quay during current redevelopment.

This building on the campshire at Custom House Quay is undergoing redevelopment by Dublin City Council in late 2023. NTA understands that DCC does not propose to reduce the width of the already narrow building as that would adversely affect the functionality of the building. The proposed two-way cycle track alongside the northern edge of the building will therefore be restricted in width over a length of 80m past this building. Such pinch-points occur on cycle routes in constrained locations, with the implication that overtaking would be restricted briefly for faster cyclists, which is a very minor matter for the quality of service on the cycle route.

3. Response to Individual Submissions on the Proposed Scheme

3.1 Ref. No.1 – John Spain Associates and Waterman-Moylan on behalf of Amphitheatre Ireland Ltd. (3Arena)

3.1.1 Submission Location – Section 1b – Northern Liffey Quays – East

The submission raised the following issues:

1. Concerns in relation to access to the 3-Arena.

3.1.2 Response to submission

Detailed responses to the points raised in the submission are provided in Section 2.2.3.1 of this report.

3.2 Ref. No.2 – Angela Nicholson & Others

3.2.1 Submission Location – Section 3 – Ringsend / Irishtown

The submission raised the following issues:

1. Impacts on Strand Street.
2. No consideration given to the Waxies' Dargle monument at Pembroke Street.

3.2.2 Response to submission

Detailed responses to Points 1 and 2 raised in the submission are provided in Section 2.6.3.4 and 2.6.3.5 of this report.

3.3 Ref. No.3 – Bernadette O'Connor

3.3.1 Submission Location – Section 3 – Ringsend / Irishtown

The submission raised the following issues:

1. Suggestions for alternative cycle routing.
2. Objections to cycling in Ringsend Park.

3.3.2 Response to submission

Detailed responses to Points 1 and 2 raised in the submission are provided in Section 2.6.3.1 and 2.6.3.3 of this report.

3.4 Ref. No.4 – Carol Reynolds

3.4.1 Submission Location – Section 3 – Ringsend / Irishtown

The submission raised the following issues:

1. Suggestions for alternative cycle routing.

3.4.2 Response to submission

Detailed responses to the points raised in the submission are provided in Section 2.6.3.1 of this report.

3.5 Ref. No.5 – CHQ Dublin Ltd.

3.5.1 Submission Location – Section 1a – Northern Liffey Quays - West

The submission raised the following issues:

1. Various concerns raised in relation to the CPO and Section 51 processes.

3.5.2 Response to submission

Detailed responses to the points raised in the submission are provided in Section 2.1.3.1 of this report.

3.6 Ref. No.6 – Cllr. Claire Byrne

3.6.1 Submission Location – Various

The submission raised the following issues:

1. Co-ordination with other projects.
2. Request to maintain Scherer Bridges in situ.
3. Request to widen pedestrian and cycle facilities.
4. Interim Improvements at Samuel Beckett Bridge.
5. Objections to cycling in Ringsend Park.
6. Suggestions for alternative cycle routing.

3.6.2 Response to submission

Detailed responses are provided in the following sections:

- | | |
|--|-----------------|
| 1. Co-ordination with other projects: | Section 2.7.2 |
| 2. Request to maintain Scherzer Bridges in situ: | Section 2.1.3.4 |
| 3. Request to widen pedestrian and cycle facilities: | Section 2.1.3.5 |
| 4. Interim Improvements at Samuel Beckett Bridge: | Section 2.1.3.6 |
| 5. Objections to cycling in Ringsend Park: | Section 2.6.3.3 |
| 6. Suggestions for alternative cycle routing: | Section 2.6.3.1 |

3.7 Ref. No.7 – Tom Phillips Associates for Custom House Docks Management Ltd.

3.7.1 Submission Location – Section 1a – Northern Liffey Quays - West

The submission raised the following issues:

1. Concerns in relation to impacts on CHQ Dublin.
2. Removal of westbound right turn from North Wall Quay at Commons Street
3. Delays and uncertainty once scheme is approved.

3.7.2 Response to submission

Detailed responses to Points 1 - 3 raised in the submission are provided in Section 2.1.3.1, 2.1.3.2 and 2.1.3.3 of this report.

3.8 Ref. No.8 – Development Application Unit

3.8.1 Submission Location – Section 1b – Northern Liffey Quays – East

The submission raised the following issues:

1. Archaeology – request for conditions to be imposed on the planning permission.
2. Request for Otter Conservation Plan and mitigation measures at Spencer Dock and MV Cill Árne Berth, request for derogation licence.
3. Request for Black Guillemot nest boxes

3.8.2 Response to submission

Detailed responses to the points raised in the submission are provided in Section 2.8 of this report.

3.9 Ref. No.9 – Dublin City Council

3.9.1 Submission Location – Various

Dublin City Council made a comprehensive and broad-ranging submission covering the following broad themes:

1. Planning.
2. Traffic.
3. Roads.
4. Environmental Protection and water quality.
5. Archaeology.
6. Conservation.
7. Architecture.
8. Parks & Landscape.

3.9.2 Response to submission

Detailed responses to all of the points raised in the submission are provided in Section 2.9 of this report.

3.10 Ref. No.10 – Dublin Cycling Campaign

3.10.1 Submission Location – Various

The submission raised the following issues:

1. 2-way cycle tracks should be wider.
2. Improvement required at southern end of the Beckett Bridge.
3. Point junction improvement not in the scheme.
4. Tom Clarke Bridge needs cycling facility and better footpath.
5. Better alignment for cycle track at Strand Road / Irishtown Stadium.
6. Tie-ins at Sean Moore Road and Pigeon House Road out of date with recent changes.
7. Opportunity to widen cycle track at Docklands Centre on Custom House Quay during current redevelopment.

3.10.2 Response to submission

Detailed responses to Points 1-7 raised in the submission are provided in Section 2.10 of this report.

3.11 Ref. No.11 – Hibernia Real Estate Group

3.11.1 Submission Location – Section 2 – Dodder Public Transport Opening Bridge

The submission raised the following issues:

1. Visual prominence of the new rowing club building, as seen from Portview House.

3.11.2 Response to submission

A detailed response is provided in Section 2.5.3.1 of this report.

3.12 Ref. No.12 – Senator Ivana Bacik

3.12.1 Submission Location – Various

The submission raised the following issues:

1. Request to widen pedestrian and cycle facilities.
2. Objections to cycling in Ringsend Park.
3. Maintenance of local access to Cambridge Park / Pembroke Cottages and Ringsend Park.
4. Construction stage impacts.
5. Protection of Biodiversity.

3.12.2 Response to submission

Detailed responses to these points are provided in Section 2.1.3.5, 2.6.3.3, 2.6.3.2, 2.7.4, and 2.7.5 of this report.

3.13 Ref. No.13 – Joseph Taylor

3.13.1 Submission Location – Section 3 – Ringsend / Irishtown

The submission raised the following issues:

1. Objections to cycling in Ringsend Park.

3.13.2 Response to submission

A detailed response to the point raised in the submission is provided in Section 2.6.3.3 of this report.

3.14 Ref. No.14 – Mary O’Hanlon

3.14.1 Submission Location – Section 3 – Ringsend / Irishtown

The submission raised the following issues:

1. Objections to cycling in Ringsend Park.
2. Impacts on Strand Street.

3.14.2 Response to submission

Detailed responses to the points raised in the submission are provided in Sections 2.6.3.3 and 2.6.3.4 of this report.

3.15 Ref. No.15 – Mary O’Neill for Ringsend and Irishtown Tidy Towns & Environment

3.15.1 Submission Location – Section 3 – Ringsend / Irishtown

The submission raised the following issues:

1. Suggestions for alternative cycle routing.

3.15.2 Response to submission

A detailed response to the point raised in the submission is provided in Section 2.6.3.1 of this report.

3.16 Ref. No.16 – Cronin & Sutton for NWQ DevCo Ltd.

3.16.1 Submission Location – Section 1b – Northern Liffey Quays - East

The submission raised the following issues:

1. Concerns in relation to impacts on City Block 9.

3.16.2 Response to submission

A detailed response to the submission is provided in Section 2.2.3.3 of this report.

3.17 Ref. No.17 – A&L Goodbody for OPCO Customs House DAC

3.17.1 Submission Location – Section 1b – Northern Liffey Quays - East

The submission raised the following issues:

1. Query about the loading layby on Custom House Quay at the Hilton Garden Inn Hotel.

3.17.2 Response to submission

A detailed response to the submission is provided in Section 2.1.3.7 of this report.

3.18 Ref. No.18 – Waterman Moylan for Park Rite & IFSC Car Parks

3.18.1 Submission Location – Section 1a – Northern Liffey Quays - West

The submission raised the following issues:

1. Removal of westbound right turn from North Wall Quay at Commons Street

3.18.2 Response to submission

A detailed response to the point raised in the submission is provided in Section 2.1.3.2 of this report.

3.19 Ref. No.19 – Rose & Edward Phipps

3.19.1 Submission Location – Section 3 – Ringsend / Irishtown

The submission raised the following issues:

1. Suggestions for alternative cycle routing.
2. Impacts on Strand Street.

3.19.2 Response to submission

Detailed responses to Points 1 and 2 raised in the submission are provided in Section 2.6.3.1 and 2.6.3.4 of this report.

3.20 Ref. No.20 – Sheena Bourke

3.20.1 Submission Location – Section 3 – Ringsend / Irishtown

The submission raised the following issues:

1. Suggestions for alternative cycle routing.
2. Impacts on Strand Street.

3.20.2 Response to submission

Detailed responses to Points 1 and 2 raised in the submission are provided in Section 2.6.3.1 and 2.6.3.4 of this report.

3.21 Ref. No.21 – NRB for Spencer Dock Management Ltd.

3.21.1 Submission Location – Section 1b – Northern Liffey Quays - East

The submission raised the following issues:

1. Removal of westbound right turn from North Wall Quay at Commons Street

3.21.2 Response to submission

A detailed response to the first point raised in the submission is provided in Section 2.1.3.2 of this report.

3.22 Ref. No.22 – Transport Infrastructure Ireland

3.22.1 Submission Location – Section 1b – Northern Liffey Quays – East

The submission raised the following issues:

1. Concerns in relation to interactions with the Luas Line at Mayor Street

3.22.2 Response to submission

Detailed responses to the points raised in the submission are provided in Section 2.2.3.2 of this report.

3.23 Ref. No.23 – Cronin & Sutton for Waterside Block 9 Developments Ltd.

3.23.1 Submission Location – Section 1b – Northern Liffey Quays – East

The submission raised the following issues:

1. Concerns in relation to impacts on City Block 9

3.23.2 Response to submission

Detailed responses to the points raised in the submission are provided in Section 2.2.3.3 of this report.