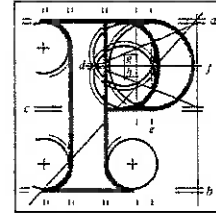


**Our Case Number: ABP-317742-23**



**An  
Bord  
Pleanála**

Development Applications Unit  
The Manager  
Newtown Road  
Wexford  
Co. Wexford  
Y35 AP90

**Date:** 11 October 2023

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

Dear Sir / Madam,

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

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

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

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

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

Yours faithfully,

Sarah Caulfield  
Executive Officer  
Direct Line: 01-8737287

HA03A

Teil (01) 858 8100  
Glao Áitiúil LoCall 1800 275 175  
Facs (01) 872 2684  
Láithreán Gréasáin Website [www.pleanala.ie](http://www.pleanala.ie)  
Ríomhphost Email [bord@pleanala.ie](mailto:bord@pleanala.ie)

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

**Fw: ABP-317742-23 Bray to Dublin City Centre Bus Connects.**

Klaudia Wiezowska <[klaudia.wiezowska@pleanala.ie](mailto:klaudia.wiezowska@pleanala.ie)>

Wed 10/11/2023 12:15 PM

To: Klaudia Wiezowska <[klaudia.wiezowska@pleanala.ie](mailto:klaudia.wiezowska@pleanala.ie)>

**From:** Sarah Caulfield <[s.caulfield@pleanala.ie](mailto:s.caulfield@pleanala.ie)>

**Sent:** Tuesday, October 10, 2023 2:33 PM

**To:** Housing Manager DAU <[Manager.DAU@npws.gov.ie](mailto:Manager.DAU@npws.gov.ie)>

**Cc:** Klaudia Wiezowska <[klaudia.wiezowska@pleanala.ie](mailto:klaudia.wiezowska@pleanala.ie)>

**Subject:** RE: ABP-317742-23 Bray to Dublin City Centre Bus Connects

Dear Diarmuid,

The Board acknowledges receipt of your email and submission on the above-mentioned application.

Kind Regards,  
Sarah

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**From:** Housing Manager DAU <[Manager.DAU@npws.gov.ie](mailto:Manager.DAU@npws.gov.ie)>

**Sent:** Tuesday, October 10, 2023 1:57 PM

**To:** LAPS <[laps@pleanala.ie](mailto:laps@pleanala.ie)>

**Subject:** ABP-317742-23 Bray to Dublin City Centre Bus Connects

ABP Ref: ABP-317742-23

Our Ref: SID-WW-2023-031

A Chara,

Please find attached Heritage Related recommendations for the above mentioned Strategic Infrastructure Development application.

Regards  
Diarmuid

**Diarmuid Buttimer**

*Executive Officer*

**An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta**  
**Department of Housing, Local Government and Heritage**  
**Aonad na nIarratas ar Fhorbairt**

*Development Applications Unit*

**Oifigí an Rialtais**

*Government Offices*

**Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90**  
Newtown Road, Wexford, County Wexford, Y35 AP90

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[Diarmuid.Buttimer@housing.gov.ie](mailto:Diarmuid.Buttimer@housing.gov.ie)

[Manager.DAU@housing.gov.ie](mailto:Manager.DAU@housing.gov.ie)



Your Ref: **ABP-317742-23**  
Our Ref: **SID-WW-2023-031**

10 October 2023

The Secretary  
An Bord Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902

Via email to [laps@pleanala.ie](mailto:laps@pleanala.ie)

Re: Notification under the Planning and Development Act, 2000, as amended.

**SID Application: National Transport Authority: BusConnects Dublin - Bray to City  
Centre: Wicklow**

A chara

I refer to correspondence in connection with the above. Outlined below are heritage-related observations/recommendations coordinated by the Development Applications Unit under the stated headings

### **Archaeology**

It is noted that the EIAR submitted as part of the planning application incorporates a desk-based Archaeological Impact Assessment which was carried out in relation to the proposed development by Courtney Deery Heritage Consultancy Ltd (EIAR Chapter 15; date August 2023). The Department has reviewed the EIAR and is broadly in agreement with the findings in relation to Archaeology and Cultural Heritage as set out therein.

Therefore, the Department of Housing, Local Government and Heritage advises that the following should be included as a condition of any grant of permission. Note these recommended conditions align with Sample Conditions C5 and C6 as set out in *OPR Practice Note PN03: Planning Conditions (October 2022)*, with appropriate site-specific additions/adaptations based on the particular characteristics of this development and informed by the findings of the EIAR.

### **Archaeological Requirements:**

1. All mitigation measures in relation to archaeology and cultural heritage as set out in Chapter 15 of the EIAR (Courtney Deery Heritage Consultancy Ltd; date August 2023) shall be implemented in full, except as may otherwise be required in order to comply with the conditions of this Order.



2. A Project Archaeologist shall be appointed to oversee and advise on all aspects of the scheme from design, through inception to completion.
3. The Construction Environment Management Plan (CEMP) shall include the location of any and all archaeological or cultural heritage constraints relevant to the proposed development as set out in Chapter 15 of the EIAR (Courtney Deery Heritage Consultancy Ltd; date August 2023) and by any subsequent archaeological investigations associated with the project. The CEMP shall clearly describe all identified likely archaeological impacts, both direct and indirect, and all mitigation measures to be employed to protect the archaeological or cultural heritage environment during all phases of site preparation and construction activity.
4. The planning authority and the Department shall be furnished with a final archaeological report describing the results of all archaeological monitoring and any archaeological investigative work/excavation required, following the completion of all archaeological work on site and any necessary post-excavation specialist analysis. All resulting and associated archaeological costs shall be borne by the developer.

**Reason:** To ensure the continued preservation (either *in situ* or by record) of places, caves, sites, features or other objects of archaeological interest.

#### **Nature Conservation**

Having considered the documentation supporting this application, and in particular the Environmental Impact Assessment Report (EIAR), the Department wishes to make observations concerning several matters in relation to the potential effects of the proposed development on flora and fauna and approaches to be taken to minimise any adverse effects on these elements of biodiversity which might result from the scheme.

It is noted that in the course of bat activity transect surveys of sections of the proposed bus connects corridor from Bray to St. Stephens Green undertaken on behalf of the applicant, three species of bats were recorded, namely Leisler's bat, and common and soprano pipistrelle bats. In addition, surveys of trees along the route for features which could be potentially be utilised by bat species for roosting, or Potential Bat Roost Features (PRFs), identified various trees with PRFs, including 19 trees which it is proposed to remove to facilitate the construction of the proposed scheme. No further survey work of the PRF trees to be felled, however, was carried out to discover whether these trees were actually being used or had been used by bats as roosting places. Such work could have involved undertaking dusk bat emergence surveys or dawn entry surveys of the PRF trees at periods of the year when bats are active, or inspection of the PRFs themselves comprising knotholes, other tree cavities and thick ivy by bat specialists using endoscopes.

In the EIAR it is stated that before the commencement of works on the bus corridor it is intended to carry out a pre-construction survey of the PRF trees to be removed, as well as to check other trees to be felled for PRFs which may have developed since they were



originally surveyed. If bats are then found to be present in any of the PFRs, derogation licences will be applied for to remove the relevant PRF trees. As bat species though are included in Annex IV of the Habitats Directive (92/43/EEC) and therefore subject under Article 12 of the Directive to a system of strict protection which prohibits *inter alia* their deliberate killing or disturbance, or the deterioration or destruction of their breeding or resting places, the Department considers that in order that the Board can be assured prior to granting permission for the proposed development that it will not have any significant adverse effects on bat species, the National Transport Authority (NTA) should be requested to submit to the Board as Further Information a licence issued by the National Parks and Wildlife Service (NPWS) of this Department on behalf of the Minister to derogate from the Habitats Directive to fell the 19 PRF trees proposed to be removed. The NTA should be reminded that when applying to the NPWS for this derogation licence details of the methodologies and timings of the pre-construction surveys of PRF trees it intends to undertake to establish the usage of bats of the trees must be included, as well all measures which will be taken to avoid injury to bats and minimise the development's effects on bat populations, so that the Department will be provided with sufficient information to determine if issuing the requested derogation licence is appropriate.

Many of the PRF trees to be removed are located on the approach roads to Shankill, particularly on the section of the old Bray Road between Shanganagh cemetery and the Wilford Roundabout. The trees concerned on this stretch of the scheme route appear, as noted in the Arboricultural Impact Statement supporting the present application, to be represented on the First Ordnance Survey Maps from 1837 to 1842 and may consequently be 200 or more years old. While all these trees are planted and predominantly of exotic species such as horse chestnut and sycamore therefore of relatively limited value in themselves from a nature conservation perspective, because of their large size, numbers, good condition and the considerable number of cavities present in them, as well as containing the bat PRFs they comprise valuable breeding and feeding habitat for birds. Unfortunately no breeding bird surveys were carried out in connection with the present application, but because of the aforementioned characteristics it is apparent these trees offer potential nesting sites for cavity nesters such as tit species, starling, jackdaw and possibly tree creeper, while their large size favours their use for nesting by other corvid species, wood pigeon and potentially stock dove and sparrow hawk, both known to be present in this area from survey work carried out for other development projects. In the light of the possible use of these large mature trees in the Crinken-Woodbrook area by roosting bats and their definite value for nesting birds the Department recommends the Board should carefully review the need to remove them in order to facilitate the laying out of the proposed bus corridor and associated cycle lanes.

It is noted also that the construction of the proposed bus corridor will involve works on the Loughlinstown Roundabout and dual carriageway in the immediate vicinity of the partially wooded bank below St. Columcille's Hospital, where three species of orchid, bee, common spotted and pyramidal, occur with other calcicole plant species, and which has been managed by the Dún Laoghaire-Rathdown County Council's Parks Department to conserve



these species for about 15 years. Though the proposed scheme does not apparently involve any encroachment on the area where the orchids occur, which includes the mixed tree group designated G0500 P in the constraints map contained in the Arboricultural Impact Assessment supporting the present application, it is important that no 'collateral' damage to this area takes place during works on the scheme, for instance by the disposal of spoil.

Likewise just beyond the boundaries of the section of Stonebridge Road, Shankill, included in the presently proposed scheme, on the opposite side of the overbridge over the Shankill bypass, between the junction of Stonebridge Road and the Falls Road and the entrance to the house named Little Grange, a circa 10 m long roadside bank is the only known site in the Dún Laoghaire-Rathdown County Council area for the greater knapweed (*Centaurea scabiosa*) which grows here with other calciphilous species now rare in this area. In County Dublin as a whole the greater knapweed is now probably present on no more than six sites, and it is known to have been present in the Stonebridge Road area since at least 1899 (Flora of County Dublin, Dublin Naturalists' Field Club, 1998). No works are planned as part of the bus corridor scheme for the part of Stonebridge Road beside which the greater knapweed grows, but as in the case of the bank below Loughlinstown Hospital, it is essential for the continued survival of its site there that no incidental or accidental damage to this area occurs during the works on the scheme.

On account of the high botanical and biodiversity value of the banks under Loughlinstown hospital and beside Stonebridge road outlined above, the Department recommends that a condition should be attached to any permission eventually granted for the proposed Bray-Dublin Bus Connects scheme that reference shall be made in the Construction Environmental Management Plan (CEMP) to be prepared for this project to the existence of these botanical significant sites, and that provision is made so that management and staff working on the scheme are made aware of the importance of avoiding any interference with or damage to them.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at [manager.dau@npws.gov.ie](mailto:manager.dau@npws.gov.ie) :

Is mise le meas,

**Diarmuid Buttimer**  
**Development Applications Unit**  
**Administration**