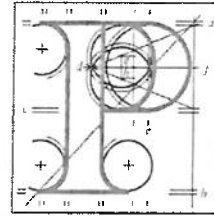


Our Case Number: ABP-317742-23



**An
Bord
Pleanála**

Dublin City Council
Civic Offices
Wood Quay
Dublin 8

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

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

Yours faithfully,



Sarah Caulfield
Executive Officer
Direct Line: 01-8737287

HA03A

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**Written Submission from Dublin City
Council Chief Executive
to An Bord Pleanála
in relation to
the National Transport Authority's
BusConnects Dublin – Bray to City Centre Core Bus Corridor Scheme
An Bord Pleanála Ref. HA27.317742**

- 1.0 Application – Bray to City Centre Core Bus Corridor Scheme**
- 1.1 Scope of Report**
- 2.0 Description of the Proposed Development**
- 2.1 Relevant Planning History**
- 2.2 Policy Context**
- 2.2.1 Regional Level**
- 2.2.2 Citywide Level**
- 2.2.2.1 Dublin City Development Plan 2022-2028**
- 2.3 Planning Assessment**
- 2.3.1 Planning Policy**
- 2.3.2 Environmental Impact Assessment Report (EIAR)**
- 2.3.3 Natura 2000**
- 2.3.4 Land Use Zoning Objectives**
- 2.4 Departmental Reports**
- 2.4.1 Strategic Observation from the Forward Planning Section**
- 2.4.2 Environment and Transportation Department Comments**
- 2.4.2.1 General Comments**
- 2.4.2.2 Traffic Division Comments**
- 2.4.2.2.1 Project Delivery Mechanism**
- 2.4.2.3 Roads Division Comments**
- 2.4.2.4 Active Travel Office Comments**
- 2.4.2.5 Environmental Protection Division Comments**
- 2.4.2.6 Water Framework Directive**
- 2.4.2.7 Flood Prevention**
- 2.4.3 Archaeology Section Comments**
- 2.4.4 Conservation Section Comments**
- 2.4.5 City Architects Division Comments**
- 2.4.6 City Parks, Biodiversity and Landscape Division Comments**
- 2.5 Conclusion**

Appendix 1 – Recommended Conditions

1.0 Bray to City Centre Core Bus Corridor Scheme

The National Transport Authority has applied under Section 51 (2) of the Roads Act 1993 (as amended) to An Bord Pleanála for approval in relation to a proposed road development consisting of the Bray to City Centre Core Bus Corridor Scheme together with all ancillary and consequential works for the purpose of facilitating public transport.

1.1 Scope of Report

In accordance with Section 51 (3)(b) of the Roads Act 1993 (as amended), this submission sets out the views of Dublin City Council (a prescribed body), on the Bray to City Centre Core Bus Corridor Scheme and the potential effects of the proposed development on the environment and the proper planning and sustainable development of the area.

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

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

The BusConnects programme seeks to greatly improve bus services in Irish cities, including Dublin, so that journeys by bus will be fast, reliable, punctual, convenient and affordable. BusConnects is part of the Government's policy to improve public transport and address climate change in Dublin and other cities. BusConnects is included as a specific policy objective of Project Ireland 2040 – The National Development Plan 2018 – 2027 (Government of Ireland 2018); and the Climate Action Plan 2021 (Government of Ireland 2021b).

2.0 Description of the Proposed Development

The proposed scheme has an overall length of approximately 18.5km. It passes through the functional area of Wicklow County Council, Dun Laoighaire-Rathdown County Council and Dublin City Council. The scheme is routed along R138 and commences at the junction of Leeson Street Lower and Earlsfort Terrace on St. Stephen's Green. It runs along Leeson Street Lower and Upper, and Sussex Road providing continuous bus priority and segregated cycle tracks in each direction. A bus gate will be located at the end of Leeson Street Lower by the St. Stephen's Green junction. The full cycle track and bus lane provision will continue along Morehampton Road to Donnybrook Road. From Mulberry Lane to Rampart Lane the northbound bus lane is removed to allow for two reduced width segregated cycle tracks, which the southbound bus lane has been retained along this narrow section.

The Proposed Scheme will run south along the Stillorgan Road and Bray Road from the Anglesea Road junction. The existing lane configuration will be maintained for the most part along this section of the scheme. New junction layouts have been proposed as well as

improved cycling and pedestrian facilities. From this section on is outside the functional area of Dublin City Council and shall not be considered in this report.

Within the extents of the Proposed Scheme route, bus priority infrastructure is currently provided along approximately 69% (outbound) and 68% (inbound). The Proposed Scheme will facilitate 99.6% bus priority and complement the rollout of the Dublin Area Bus Network Redesign, improving journey times for buses, enhance its reliability and provide resilience to congestion. There are existing mandatory cycle tracks currently provided on approximately 51% of the route, while advisory lanes are provided for approximately 41% of the route. The remaining extents have no dedicated cycle provision or cyclists must cycle within the bus lanes provided. Cycle facilities in the Proposed Scheme will increase in both directions with the majority, approximately 91% being segregated.

The Proposed Scheme, within the functional area of Dublin City Council is described in the following geographical sections:

- Section 1: Leeson Street to Donnybrook (Anglesea Road Talbot Memorial Bridge to Tom Clarke East Link Bridge);
- Section 2: Donnybrook (Anglesea Road Junction) to Loughlinstown Roundabout

Section 1: Leeson Street to Donnybrook (Anglesea Road Junction)

This section runs along Leeson Street Lower and Upper from the junction with St. Stephen's Green, providing continuous bus priority and segregated cycle tracks in each direction. A bus gate has been located at the end of Leeson Street Lower before the St. Stephen's Green junction. General inbound traffic is now to be directed from Leeson Street Lower on to Hatch Street Lower, and then on to Earlsfort Terrace in order to reach St. Stephen's Green. There will be two-way general traffic introduced on Earlsfort Terrace between the Hatch Street Lower Junction and St. Stephen's Green to facilitate this. This will require the northbound bus lane on Earlsfort Terrace to be made a general traffic lane. The existing left turning ban at the Earlsfort Terrace towards Stephen's Green North has been removed to facilitate the general traffic movement.

The one-way system on Sussex Road and the adjacent section of Leeson Street Upper have been retained, with a reduced number of general traffic lanes in each direction to allow for full bus and cycle lane provision and retain existing parking. The proposed junction at Fitzwilliam Place and Leeson Street Lower from the Fitzwilliam Cycle Route (Dublin City Council) has been incorporated into the Proposed Scheme, while revised junction layouts at Appian Way, Waterloo Road, and Wellington Place have been designed to improve road user throughput and safety. The full cycle track and bus lane provision continues along Morehampton Road, where in places the cycle tracks are brought behind the tree line. This will impact a number of on-street parking bays between Wellington Place and Belmont Avenue. A 'No Right Turn' restriction has been added from Morehampton Road onto Auburn Avenue to reduce crossing point conflicts. From Mulberry Lane to Rampart Lane the northbound bus lane has been removed to allow for two reduced width segregated cycle tracks in both directions, while the southbound bus lane has been retained along this narrow section. Signal-controlled priority at the Eglinton Terrace junction on Donnybrook Road will provide northbound bus priority over this length. The perpendicular parking spaces south of Mulberry Lane have been converted to parallel spaces, while the echelon parking spaces on the other side of the road have been retained. From Eglinton Terrace southwards to Eglinton Road a dedicated bus lane,

segregated cycle track, and general traffic lane are provided in each direction. The tie in for the proposed Dodder Greenway, designed and built by others, has been included in the design at the Eglinton Road junction on Donnybrook Road. On Donnybrook Road between Eglinton Road and Anglesea Road in the southbound direction, there is a straight ahead and left-turn lane, a straight ahead general traffic lane, a bus lane, and a cycle track provided. The northbound approach on the Stillorgan Road towards Beaver Row has a cycle track, bus lane, a combined left and ahead general traffic lane, and a right-turn lane to Ailesbury Road. Between Beaver Row and Eglinton Road there is a cycle track, bus lane, and a combined left and ahead traffic lane. Coach laybys have been proposed at certain locations to reduce instances of loading coaches blocking the bus lane. It is proposed that, where possible along Section 1 of the Proposed Scheme, existing kerb lines will be retained and the BusConnects Design Guide will be adhered to. Signal-controlled priority shall be employed at certain locations where full segregated bus lane provision has not been possible due to space constraints.

Section 2: Donnybrook (Anglesea Road Junction) to Loughlinstown Roundabout.

The existing lane configuration is maintained on the Stillorgan Road between the Beaver Row / Anglesea Road junction and Foster's Avenue, apart from the southbound on-slip at Belfield, where a continuous bus lane is now provided from the slip road to the Stillorgan Road. To achieve this, the existing southbound bus lane on the Stillorgan Road has been truncated and will require coaches, buses, and taxis using it to merge with the adjacent general traffic lane as they pass under the Belfield flyover. New continuous bus lanes will be provided on the southbound off-slip, and across the Belfield flyover. It is intended to provide segregated cycle tracks on each slip road and a two-way segregated cycle track on the Belfield flyover. A separate cycle link will be provided to the adjacent side road to the east of the southbound slip roads. Beyond this point, the Proposed Scheme is outside the Dublin City Council functional area.

2.1 Relevant Planning History

Sub Appendix 2 of Volume 4 of the EIAR refers to significant planning applications granted permission from 2011 to May 2023 along and adjacent to the route. The appendix refers to the following applications of note which are located adjacent to the scheme:

- 3301/20 – Permission granted for a mixed-use development including 100 residential units at Donnybrook Road (former Kiely's Public House), Donnybrook.

The following schemes were omitted from this Planning History:

SHD0008/20 – (ABP307197-20) - 36,38, 40 Herbert Park & 10 Pembroke Place – Permission granted for an apartment building of 4, 6, 8 and 12-storeys, over a basement (3 split levels).

SHD0010/20 – (ABP310299/21)- Maxol Filling Station, Beach Road, Dublin 4 – Permission granted for the demolition and removal of all existing buildings and associated structures above and below ground and the construction of a 6-storey apartment accommodating 112No. apartments.

SHD0012/20 – (ABP-307267-20) - 1, 3, 5, 7, 9, 11 Eglinton Road, Donnybrook – Permission granted for demolition of 6 no. houses and ancillary structures on site, and the construction of

a residential development of two connected apartment blocks of 148 no. apartments, rising in height from 3 storeys to 12 storeys over basement.

LRD6003/22 - a c.4.155 ha site which previously formed part of the overall RTÉ Campus at Montrose, Donnybrook, Dublin 4 – Permission granted a Large-scale Residential Development of 688 no. apartments comprising of 272 no. Build to Sell units and 416 no. Build to Rent units.

2.2 Policy Context

2.2.1 Regional Level

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

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

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

2.2.2. Citywide Level

2.2.2.1 Dublin City Development Plan 2022-2028

The City Development Plan is the statutory planning context for the assessment of development proposals. It sets out the policy context for the next six years to 2028. A significant number of policies have relevance for the delivery of transport infrastructure in the city.

The core strategy set out in the plan is to develop a low carbon, sustainable and climate resilient capital city, where people will choose to live, work, experience city living, invest and socialise. The vision for the city is that, within the next ten years, it will have an established international reputation as a city region that is one of Europe's most sustainable, dynamic and resourceful. It is envisaged that the city will be a beautiful, compact city, with a distinct character and a vibrant culture, and with a diverse, green and innovation-based economy. The city will be a socially inclusive city of urban neighbourhoods based on the principle of the 15-minute city, which allows people's daily requirements to be reached within 15 minutes by foot,

bicycle or public transport, and is therefore compact. All development will be connected by exemplary public transport, cycling and walking systems.

Dublin City Council (DCC) supports the improvement of public transport and cycling which will allow for higher density development, thereby creating a more sustainable interaction between land-use and transport. Chapter 8 of the Development Plan 'Sustainable Movement and Transport' sets out DCC policies and objectives which are relevant to Bus Connects. For convenience, relevant policies and objectives are quoted hereunder:

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

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

SMT4 Integration of Public Transport Services and Development *To support and encourage intensification and mixed-use development along public transport corridors and to ensure the integration of high quality permeability links and public realm in tandem with the delivery of public transport services, to create attractive, liveable and high quality urban places.*

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

SMT01 Transition to More Sustainable Travel Modes *To achieve and monitor a transition to more sustainable travel modes including walking, cycling and public transport over the lifetime of the development plan, in line with the city mode share targets of 26% walking/cycling/micro mobility; 57% public transport (bus/rail/Luas); and 17% private (car/van/HGV/motorcycle).*

SMT02 Improving the Pedestrian Network *To improve the pedestrian network, and prioritise measures such as the removal of slip lanes, the introduction of tactile paving, ramps, raised tables and kerb dishing at appropriate locations, including pedestrian crossings, street junctions, taxi ranks, bus stops and rail platforms in order to optimise safe accessibility for all users.*

SMT11 Pedestrian Network *To protect, improve and expand on the pedestrian network, linking key public buildings, shopping streets, public transport points and tourist and recreational attractions whilst ensuring accessibility for all, including people with mobility impairment and/or disabilities, older persons and people.*

SMT12 Pedestrians and Public Realm *To enhance the attractiveness and liveability of the City through the continued reallocation of space to pedestrians and public realm to provide a safe and comfortable street environment for pedestrians of all ages and abilities.*

SMT13 Urban Villages and the 15-Minute City *To support the role of the urban villages in contributing to the 15-minute city through improvement of connectivity in particular for active travel and facilitating the delivery of public transport infrastructure and services, and public realm enhancement.*

SMT14 City Centre Road Space *To manage City Centre road-space to best address the needs of pedestrians and cyclists, public transport, shared modes and the private car, in particular, where there are intersections between DART, LUAS and Metrolink and with the existing and proposed bus network.*

SMT16 Walking, Cycling and Active Travel *To prioritise the development of safe and connected walking and cycling facilities and prioritise a shift to active travel for people of all ages and abilities, in line with the city's mode share targets.*

SMT18 The Pedestrian Environment *To continue to maintain and improve the pedestrian environment and strengthen permeability by promoting the development of a network of pedestrian routes including laneway connections which link residential areas with recreational, educational and employment destinations to create a pedestrian environment that is safe, accessible to all in accordance with best accessibility practice.*

SMT19 Integration of Active Travel with Public Transport *To work with the relevant transport providers, agencies and stakeholders to facilitate the integration of active travel (walking/cycling etc.) with public transport, ensuring ease of access for all.*

SMT22 Key Sustainable Transport Projects *To support the expeditious delivery of key sustainable transport projects so as to provide an integrated public transport network with efficient interchange between transport modes, serving the existing future needs of the city and region and to support the integration of existing public transport infrastructure with other transport modes. In particular the following projects subject to environmental requirements and appropriate planning consents being obtained:*

- *DART+*
- *Metrolink from Charlemont to Swords*
- *Bus Connects Core Bus Corridor projects*
- *Delivery of Luas to Finglas*
- *Progress and delivery of Luas to Poolbeg and Lucan*

Section 8.5.8 of the Dublin City Development Plan refers to **Street/Road, Bridge and Tunnel Infrastructure**. It states 'New bridge infrastructure will also facilitate the continued development of the city such as the Dodder Public Transport Bridge, which is linked to development of the Poolbeg West Strategic Development Zone (SDZ) and pedestrian/cycle bridges, which will improve connectivity between the north and south docklands areas.'

OTHER RELEVANT POLICIES

There are a significant number of City Development Plan policies with relevance to the delivery of transport in the city, including:

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

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

QHSN11 15-Minute City *To promote the realisation of the 15-minute city which provides for liveable, sustainable urban neighbourhoods and villages throughout the city that deliver healthy placemaking, high quality housing and well designed, intergenerational and accessible, safe and inclusive public spaces served by local services, amenities, sports facilities and sustainable modes of public and accessible transport where feasible.*

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

There are no area specific plans, such as SDRAs, LEIPs or LAPs that take in the proposed route although potentially the South Georgian Core LEIP indicated in Table 2.15 of the Dublin City Development Plan may be of relevance going forward, depending on the boundary of same.

2.3 Planning Assessment:

2.3.1 Planning Policy

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

At citywide planning level, the Dublin City Development Plan 2022-2028 sets out policies and objectives required to achieve its Core Strategy. The proposal has been considered with regard to this Core Strategy and the policies and objectives of the current Dublin City Development Plan and in particular the dual aspirations of delivering necessary transport infrastructure to facilitate compact growth while also protecting Natura designated sites.

2.3.2 Environmental Impact Assessment Report (EIAR)

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

2.3.3 Natura 2000

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

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

The Assessment of the Natura Impact Statement is a matter for the Board, as the competent authority.

2.3.4 Land Use Zoning Objectives

In the current Dublin City Development Plan (2022-28) the area along the proposed route includes lands with the following zoning objectives: Z1 (residential), Z2 (residential conservation) Z3 (neighbourhood centres) Z4 (urban villages and key urban villages), Z6 (Employment), Z8 (Georgian Conservation Areas), Z9 (open space), Z11 (Waterways Protection) and Z15 (Community and Social Infrastructure).

For the most part, the proposed scheme within the City Council area is situated on lands within the existing public road/pavement area.

The Dublin City Development Plan 2022-2028 defines a 'public service installation' as ' a building, or part thereof, a roadway or land used for the provision of public services. Public services include all service installations necessary for electricity, gas, telephone, radio, telecommunications, television, data transmission, drainage, including wastewater treatment plants and other statutory undertakers: bring centres, green waste composting centres, public libraries, public lavatories, public telephone boxes, bus shelters, etc. but does not include incinerators/waste to energy plants. The offices of such undertakers and companies involved in service installations are not included in this definition.'

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

Overall, it is considered that the proposals would be compatible and consistent with the zoning objectives for the area.

2.4 Departmental Reports

The following Dublin City Council Departments and Divisions submitted a report and their response has been incorporated into this submission:

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

Additional comments from the various departments etc. are provided in Appendix 1.

2.4.1 Strategic Observation from the Forward Planning Section of Dublin City Council

The Bray to City Centre Core Bus Corridor scheme is fundamental to achieving the strategic objectives envisaged in the *Dublin City Development Plan 2022-2028*, pertaining to: compact and sustainable urban growth; sustainable mobility and permeability; and placemaking, while significantly contributing towards climate action.

It is worth noting that the provision of greening or green infrastructure on the route appears to be limited and it would be worth pursuing whether additional green spaces could be provided, for example at Donnybrook, Leeson Street Upper, Stillorgan Road etc. There would also appear to be a loss of significant trees along the route in places as well e.g. Sussex Road.

In general, the proposed scheme is supported by the high level policies in place in the current Dublin City Development Plan 2022-2028.

2.4.2 Environment and Transportation Department Comments

2.4.2.1 General Comments

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

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

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

The return of bus passenger number to above pre covid levels and the increase of Bus use at weekends of 27% over the pre covid levels is very welcome.

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
- 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 Comments

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

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

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

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

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

The design of this scheme in the Dublin City Council area is difficult and complex and has called for multiple interventions along the road network in order to achieve its objectives. The use of bus priority signals, turn bans, bus gates and other interventions are all intended to alter the current traffic situation along the route and ensure that Public Transport walking and cycling can be prioritised over the private car.

It should be noted that this corridor needs to be considered as a whole and that the various different measures to prioritise public transport walking and cycling, need to be implemented in as full a manner as possible to avoid “watering down “ the benefits of this scheme by making localised changes to the design.

Because of the nature of the turn bans, bus gates and the use of signal controlled priority the deployment of Camera based bus lane enforcement will need to have been rolled out on this corridor before the full benefit of the scheme in terms of bus journey reliability can be achieved.

The enhanced data garnered by DCC from the next Generation AVL system and the next generation Bus priority system currently being specified will play a key role in how the corridor is dynamically managed to ensure that the bus journey times and headways are met.

This digital infrastructure along with the proposed civil infrastructure for traffic signals are both required for the corridor to meet its objectives

2.4.2.2.1 Project Delivery Mechanism

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

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

2.4.2.3 Roads Division Comments

This section of the Environment & Transportation report on the Bray Bus Connects Scheme has been prepared by the Roads Department. It includes technical input from Roads Design, Roads Construction, Roads Maintenance and Transportation Planning Sections, the remit of which covers design and construction phases through to maintenance and operational phases of the scheme as well as wider policy and planning considerations. The Roads Department is generally supportive of the scheme and its intention to improve bus and cycling provision. Having reviewed the application documentation, the department would like to highlight some matters which, with further consideration, could improve the scheme. The comments set out in the first instance are generally applicable to all the schemes. The Roads Department has in response to these matters developed a set of recommended standard conditions for attachment to all permissions granted which, once complied with, will facilitate engagement and agreement between DCC and the NTA at detailed design and construction stages. Scheme specific comments are also highlighted below for An Bord Pleanála’s consideration.

In general terms, Bus Connects proposes substantial improvements to bus and cycling infrastructure, with provision of additional signalised crossings for pedestrians along the routes. The schemes, including the Bray scheme, could be improved by making greater provision for pedestrians by ensuring sufficient and appropriate footpath widths based on pedestrian flows (with an absolute minimum 2m width) and also by ensuring pedestrian priority throughout the routes. There are recurring situations throughout the schemes where user

priority is unclear, for example at bus stops and where cycle routes cross footpaths. Grade or physical separation between cycling facilities and footpaths is recommended and running cycle tracks through footpaths and pedestrianised zones should be avoided. Ensuring pedestrian priority is important particularly in the context of people with accessibility issues including visual impairments. Pedestrians, in accordance with all levels of policy, should be ensured priority through signage and other appropriate measures. A condition is recommended in this regard.

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. This activity is crucial for the general functional operation of the city and to the achievement of the 15 Minute City where people can walk and cycle to local shops and services. Safeguarding the ability of local services to operate is therefore imperative. The extent of loss of loading bays is not clearly quantified in the schemes, nor is the adequacy of alternative provision demonstrated. More information and clarity in this regard would provide comfort that the scheme will continue to support the operation of local businesses. In addition to loading facilities, on street parking is also affected including at commercial units. A condition regarding loading and parking is attached.

Regarding the current scheme, it is noted that throughout the scheme layout the pedestrian environment is impacted by narrowed footpath widths and the routing of cycle lanes through pedestrian space which reduces the usable available space and the level of service for pedestrians. This is also evident at pedestrian crossing facilities and behind bus stops where cycle paths cut across pedestrian desire lines. There are concerns regarding the impact of such layouts on vulnerable road users and those with accessibility issues. An Bord's attention is also directed to a location within the scheme where, if implemented in the context of a permitted planning permission, the scheme will actually remove an entire section of public footpath (more detail is provided below). It is also noted that considerable amounts of loading and taxi spaces are being removed as part of the scheme. More detailed location specific comments are provided on a sheet by sheet basis below.

Location Specific Comments

Sheet 1

- It is noted that substantial kerbside space currently dedicated to taxis is being reallocated. However, it is not clear what arrangements are proposed for taxis that can currently use kerb side space between 20.00 and 6.00.
- Cycle path runs through centre of pedestrian space bisecting footpath, narrowing available footpath space and obstructing desire lines to premises including Catholic University School and bus stops.

Sheet 2

- It is noted that substantial kerbside space currently dedicated to taxis is being reallocated. However, it is not clear what arrangements are proposed for taxis that can currently use kerb side space between 20.00 and 6.00.
- Cycle path runs through centre of pedestrian space bisecting footpath, narrowing available footpath space and obstructing desire lines to premises and at pedestrian crossing.
- New tree planting should ensure minimum 2m unobstructed footpath widths and should take cognisance of sightlines.

Sheet 3

- Cycle path runs through centre of pedestrian space bisecting footpath, narrowing available footpath space and obstructing desire lines to premises (including hotel) and to bus stops.
- New tree planting should ensure minimum 2m unobstructed footpath widths and should take cognisance of sightlines.
- Substantially reduced taxi rank on Sussex Road.
- Substantially reduced coach parking on Sussex Road.

Sheet 4

- New tree planting should ensure minimum 2m unobstructed footpath widths and should take cognisance of sightlines.
- Narrow footpaths are noted.

Sheet 5

- New tree planting should ensure minimum 2m unobstructed footpath widths and should take cognisance of sightlines.
- Narrow footpaths are noted.

Sheet 6

- New tree planting should ensure minimum 2m unobstructed footpath widths and should take cognisance of sightlines.
- Narrow footpaths are noted.

Sheet 7

- Safety concerns with location and design of proposed accessible parking space at shops with cycle lane immediately to the side and rear.
- The existing layout of car park located east of The Crescent in front of shops is considered preferable from a design and safety point of view. The car park is enclosed with sufficient space for manoeuvring within the car park without requiring reversing onto the public road. The existing layout also accommodates an indented loading bay. The revised layout may result in reversing onto the public road and cycle way and may result in loading on the cycle lane or carriageway.
- New tree planting should ensure minimum 2m unobstructed footpath widths and should take cognisance of sightlines.
- Narrow footpaths are noted.

Sheet 8

- Planning permission granted by An Bord Pleanála under PL29S.310204 (DCC Ref: 2244/21) at the 'Circle K' site, junction of Donnybrook Road and Brookvale Road. The implementation of the Bray Scheme at this location will result in the removal of the entire public footpath along the site's frontage onto Donnybrook Road.
- New tree planting should ensure minimum 2m unobstructed footpath widths and should take cognisance of sightlines.
- Narrow footpaths are noted.

Sheet 9

- Area to east of Donnybrook Close looks congested with bus stops, cycle lane and existing planting resulting in reduced/narrowed space for pedestrians.

Sheet 10

- Provision of an extensive set down area for the Teresian School is considered undesirable and contrary to DCC and NTA policies to promote sustainable travel to schools. Consideration should be given to alternative layout to include widening of footpaths at this location.

Sheet 11

- The proposed retention of the vehicular/entrance at 118 Stillorgan Road (R138) for pedestrians and cyclists only should include alterations to the site boundary to reduce the width of the entrance at this location so as to prohibit use of it by vehicles.
- New tree planting should ensure minimum 2m unobstructed footpath widths and should take cognisance of sightlines.
- Narrow footpaths are noted.

2.4.2.4 Active Travel Office Comments

Over the lifetime of the programme, Dublin City Council's Active Travel Network will grow from an existing 10km to a connected network of 310km. It is envisaged that 90 km of this will be delivered by the BusConnects programme.

Dublin City Council's Active Travel Network will enhance quality of life by connecting all people through the delivery of infrastructure that improves the experience of walking, wheeling and cycling around Dublin. This will be achieved by improving access and connectivity, which is also a primary objective of the proposed BusConnects programme, thereby contributing to an efficient, integrated transport system and facilitating a shift to a low carbon and climate resilient city.

The Active Travel Programme Office (AcTPrO) welcomes the submission of the Bray to City Centre BusConnects Scheme, hereby referred to as 'The Scheme'. A review of The Scheme within Dublin City Council's jurisdiction has been undertaken with observations provided below.

Observations

The Scheme interacts with a number of AcTPrO projects, both existing and proposed, that comprise Dublin City Council's Active Travel Network. These projects and their points of interaction with The Scheme have been outlined below.

- City Quay to Harcourt St (project code: DCC/22/0024) and Stephen's Green to Thomas Street (DCC/21/0018) interface with The Scheme at the junction of St. Stephen's Green East, St. Stephen's Green South, Earlsfort Terrace and Leeson Street Lower. It is noted that The Scheme's supporting general arrangement drawings (sheet 01 of 54) identify a tie-in to existing carriageways at St Stephen's Green East and a tie-in to proposed project at St. Stephen's Green South.
- Fitzwilliam Street Cycle Route (DCC/17/0008) interacts with The Scheme at the junction of Fitzwilliam Place and Adelaide Road. It is noted that this interaction has been identified on The Scheme's supporting general arrangement drawings (sheet 02 of 54).
- Kilmainham to Ballsbridge South City Loop (DCC/22/0022) is proposed to interact with The Scheme along Leeson Street Upper, from Appian Way (inclusive) to Wellington Place (inclusive). It is noted that The Scheme's supporting general arrangement drawings (sheet 04 of 54) identify a tie-in to existing carriageways at both locations.
- Dodder River Greenway (DCC/12/0035) interfaces with The Scheme opposite the junction of Donnybrook Road and Eglinton Road. It is noted that this interaction has

been identified on The Scheme's supporting general arrangement drawings (sheet 08 of 54).

- Donnybrook to UCD (DCC/22/0023) interacts with The Scheme at Greenfield Park. It is noted that The Scheme's supporting general arrangement drawings (sheet 11 of 54) identify a tie-in to the existing carriageway at this location.

Regarding the interaction of The Scheme and DCC/17/0008, it is noted that Dublin City Council has already layout for the junction of Fitzwilliam Place, Leeson Street Lower and Adelaide Road as part of the Active Travel Network. It is recommended that the final details at this location be agreed with Dublin City Council.

Regarding the interaction of The Scheme and AcTPrO projects DCC/21/0018, DCC/22/0022 and DCC/22/0023, it is noted that Dublin City Council may propose changes to the existing carriageways as part of the design of respective active travel projects. Where The Scheme proposes a tie in to an existing carriageway, AcTPrO requests that provisions are made to ensure that alterations can be made within The Scheme's redline boundary up to any proposed pedestrian crossings adjacent to the core bus corridor (i.e. on roads adjacent to the core bus corridor that exist both within The Scheme's redline boundary and on Dublin City Council's Active Travel Network). This will ensure that opportunities to improve active travel facilities connectivity to the Busconnects project are maximised and Dublin City Council is not restricted in its ability to deliver Active Travel Projects within the vicinity of The Scheme.

Regarding the interaction of The Scheme and DCC/12/0035, AcTPrO requests that further consideration is given to the design of cycling facilities at the junction of Donnybrook Road and Eglinton Road. Whilst the design includes a holding location for cyclists intending to use the pedestrian crossing to move from Donnybrook Road (southbound) to Eglinton Terrace, there does not appear to be a similar holding location for cyclists intending to use the toucan crossing in the opposite direction.

AcTPrO also requests clarity on the proposed 'reduced width segregated cycle tracks' from Mulberry Lane to Rampart Lane, as per The Scheme's non-technical summary.

Finally, regarding the general enhance of active travel facilities, it is considered that The Scheme will make significant improvements along the existing corridor. Some of The Scheme's key changes welcomed by AcTPrO include:

- The number of pedestrian signal crossings will increase by 60% from 106 to 170 as a result of the Proposed Scheme;
- The proportion of segregated cycle facilities will increase from 47% on the existing corridor to 91% on the Proposed Scheme; and
- The proportion of the route having bus priority measures will increase from 69% on the existing corridor to 99.6% on the Proposed Scheme.

Conclusion

The Scheme seeks to enhance the potential for cycling by providing safe infrastructure, segregated from general traffic wherever practicable. This is welcomed by AcTPrO.

The Scheme interacts with six active travel projects being delivered by AcTPrO. In some cases, these interactions have been acknowledged within The Scheme's general arrangement drawings whilst others have not. In cases where interactions have not been identified, The Scheme proposes to tie-in to existing carriageways.

AcTPrO requests that Dublin City Council maintains the ability to amend existing carriageways within the redline boundary where tie-ins have been identified. This will ensure that AcTPrO projects can be delivered and become fully and seamlessly integrated to The Scheme in their entirety.

It is also requested that the proposal takes into consideration the Dublin City Council design layout of the junction of Fitzwilliam Place, Leeson Street Lower and Adelaide Road to ensure seamless integration.

2.4.2.5 Environmental Protection Division Comments

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

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

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

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

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

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

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

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

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

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

The following more detailed comments shall be addressed:

1. Legend should match the symbols in the drawing, i.e. the symbol for discharge location is a blackened triangle in the legend but is a red circled D in the design drawings.
2. Ch A3100-3200, the additional impermeable area has no treatment or storage detailed in the drawings. What is the treatment volume and the attenuation strategy here?
3. Ch A3450, Bio retention areas should be employed where possible and practicable to improve the runoff and overall water quality.

No comment beyond drainage Ch A3810 to Ch A4040 as this is the DCC and DLRCoCo boundary.

2.4.2.6 Water Framework Directive

The proposed Bray to City Centre Core Bus Corridor Scheme transverses the catchments of the Lower Liffey Estuary and the River Dodder within the Dublin City Council administrative area. Albeit all waterbodies are subject to the European Union Water Framework Directive, the Dodder is specifically highlighted in the River Basin Management Plan (RBMP) as 'Priority Area for Action' while the Liffey Estuary is included as 'a second tier river'. There is a legal requirement to protect and restore the status of both rivers to a 'good' designation or better, in addition to their being protected under Article 4 of the WFD. Currently both rivers are of 'moderate' status.

Dublin City Council is obliged to achieve a water quality status of 'good' or better with all waterbodies by December 2027. To support our achievement of our legislative obligations, the proposal should not cause a deterioration of the status of any waterbody which it is contiguous with downstream and furthermore should not jeopardise the attainment of good ecological and good surface water chemical status, in accordance with our obligations. In

particular, all surface water that discharges from the curtilages of the Bray to City Centre CBC Scheme proposal into existing or proposed waterbodies should be intercepted and treated, using nature based solutions wherever possible.

Where possible, drainage within the curtilage of this project should be segregated, and infrastructure for discharging surface water into existing surface water sewers should be implemented.

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

In the Environmental Impact Assessment Report, Chapter 13, we welcome the acknowledgement that urban runoff is a significant pressure on the receiving waters within the project area. However, we do not agree or accept the report's argument in regard to the 'Sensitivity of Receptors', section 13.2.4.2. The report includes an extract from the National Roads Authority, which seems to indicate that the lower the status of a water body, the less sensitive the receptor is. This insinuates that a water body, which has not yet achieved the legislative requirements set out in the EU Water Framework Directive ('Good' ecological status), may receive surface water run-off of a lower quality than 'Good'. We maintain the EU Water Framework Directive takes priority and overrides the National Road Authority and the UK Environment Agency as referenced within section 13.2.4.2 of the report.

As a Member State, Ireland is required to improve the status of ALL water bodies. Chapter 13 goes on to state that the implementation of the 3rd Cycle River Basin Management Plan should address the pressures on the receiving waters, including urban runoff. However, given the scale of the proposed project and our legal requirement to meet the EU WFD obligations by 2027, the project needs to support and be consistent with the delivery of that 3rd Cycle RBMP. While the local authority is responsible for overseeing the implementation of programmes of measures, all stakeholders need to be involved in delivering the RBMP, including the proposed project. Urban runoff is a significant urban pressure, and the Bus Connects schemes are the single biggest planned intervention to key, heavily trafficked, commuter routes into the city.

The developer shall provide an evidence-based assessment of the impact, if any, of the proposed scheme on the water quality status of the rivers within the curtilage of the proposed project, including both ecological and chemical status.

2.4.2.7 Flood Prevention

The Flood Risk Assessment should reference the current development plan 2022-2028 and not the previous one 2016-2022.

Any new drainage to rivers should be protected by flap valves.

At detailed design stage more detail will need to be provided and agreed on:

- Cross sections for crossings of the Dodder River. FRA should give more detail on this.
- Plan for dealing with local pluvial flooded areas anywhere where flood depths on the carriageway are predicted to be above 300mm.
- Climate Change Flood Adaption Plan for river crossing.

2.4.3 Archaeology Section Comments

The corridor for the proposed Bray to City Centre Bus Connects scheme traverses the Zone of Archaeological Constraint for Recorded Monument DU018-020 (Historic City). It runs from the south eastern corner of St Stephen's Green (RMP DU018-020334; National Monument Ref 1039) extending to the corner of Leeson Street Lower and Hatch Street (Figure 1). This Recorded Monument DU018-020 (Historic City) is listed on the Record of Monuments and Places (RMP) and is subject to statutory protection under Section 12 of the National Monuments (Amendment) Act 1994. The proposed route also extends through the historic village of Donnybrook, which is a Recorded Monument (RMP DU018-060/022-082 - Settlement).

Furthermore, the proposed scheme traverses the Historic City as depicted in the Dublin City Development Plan (see Map L). It is the policy of the Dublin City Development Plan 2022-28 (Section 11.5.5; BHA26) to protect and preserve monuments:

1. To protect and preserve Monuments and Places listed on the statutory Record of Monuments and Places (RMP) as established under Section 12 of the National Monuments (Amendment) Act 1994 which have been identified in the Record of Monuments and Places and the Historic Environment Viewer (www.archaeology.ie) and all wrecks over 100 years old including those in the Shipwreck Inventory of Ireland.
2. To protect archaeological material in situ by ensuring that only minimal impact on archaeological layers is allowed, by way of re-use of standing buildings, the construction of light buildings, low impact foundation design, or the omission of basements (except in exceptional circumstances) in the Monuments and Places listed on the statutory Record of Monuments and Places (RMP) as established under Section 12 of the National Monuments (Amendment) Act 1994.
3. To seek the preservation in situ (or where this is not possible or appropriate, as a minimum, preservation by record) of all archaeological monuments included in the Record of Monuments and Places; all wrecks and associated objects over 100 years old and of previously unknown sites, features and objects of archaeological interest that become revealed through development activity. In respect of decision making on development proposals affecting sites listed in the Record of Monuments and Places, the council will have regard to the advice and/or recommendations of the Department of Housing, Heritage and Local Government.
4. Development proposals within the Record of Monuments and Places (RMP) as established under Section 12 of the National Monuments (Amendment) Act 1994, notification of sites over 0.5 hectares size with potential underwater impacts and of sites listed in the Dublin City Industrial Heritage Record, will be subject to consultation with the City Archaeologist and archaeological assessment prior to a planning application being lodged.
5. To preserve known burial grounds and disused historic graveyards. Where disturbance of ancient or historic human remains is unavoidable, they will be excavated according to best archaeological practice and reburied or permanently curated.
6. Preserve the character, setting, and amenity of upstanding and below ground town wall defences.
7. Development proposals in marine, lacustrine and riverine environments and areas of reclaimed land, shall have regard to the Shipwreck Inventory maintained by the Department of Housing, Local Government and Heritage and be subject to an appropriate level of archaeological assessment.
8. To have regard to national policy documents and guidelines relating to archaeology and to best practice guidance published by the Heritage Council, the Institute of Archaeologists of Ireland and Transport Infrastructure Ireland.

It is the policy of the Dublin City Development Plan 2022-28 (Section 11.5.3; BHA16) to: Have regard to the city's industrial heritage and Dublin City Industrial Heritage Record (DCIHR) in the preparation of Local Area Plans (LAPs) and the assessment of planning

applications. To review the DCHIR in accordance with Ministerial Recommendations arising from the National Inventory of Architectural Heritage (NIAH) survey of Dublin City. The Dublin City Industrial Heritage Record survey makes recommendations for sites to be added to the list of Protected Structures in the life of the plan and it should be consulted prior to the lodgement of any planning application.

EIAR

The archaeological and cultural heritage impacts of the construction phase and operational phase associated with the construction and operation of the Bray to City Centre Core Bus Corridor Scheme are assessed in Chapter 15 of the Environmental Impact Assessment Report (EIAR), which was prepared by Lisa Courtney and Dr Claire Crowley of Courtney Deery Archaeology Ltd. This report provides a desk study of published and unpublished documentary and cartographic sources, supported by a field survey.

The EIAR lists sites/areas of historical and cultural heritage importance within the DCC area (Sections 1 & 2 of the proposed route as defined in Sections 6.1 & 6.2 of the EIAR). The Proposed Scheme runs partly through the RMP ZAP (Zone of Archaeological Potential) for the historic core of Dublin (RMP DU018-020) which incorporates St. Stephen's Green (a National Monument), Leeson Street Lower and the southern side of its junction with Hatch Street Lower. This area lay outside of the medieval walled city and the majority of the archaeological sites recorded within the buffer zone along this part of the zone comprise houses of 18th and 19th century date. There is potential for archaeological soils, features or finds relating to the expansion of the historic city beyond its medieval walls to be impacted during earthmoving works for the Proposed Scheme. There is one site within immediate proximity to the Proposed Scheme, an 18th/19th century house (DU018-020249) on Leeson Street Lower.

The Proposed Scheme passes through the zone of potential associated with the early church site and ecclesiastical settlement of Donnybrook (DU018-060), from the southern end of Morehampton Road (approximately at its junction with Mount Eden Road) through Donnybrook Village to the southern side of Anglesey Bridge. In this area the Proposed Scheme crosses three RMP sites, including an ecclesiastical enclosure (DU018-060009); an enclosure (DU018-060021) and the site of a bridge (DU022-082003). There is thus a known archaeological potential for features associated with the earliest settlement of Donnybrook to be encountered during the earthmoving works for the Proposed Scheme within the ZAP. Ground-breaking works within the zone could impact on any features that survive below ground. In addition, within Donnybrook there is potential that the former watercourse and mill race that ran in line with the present day Eglinton Terrace and crossed beneath the Donnybrook Road as shown on Rocque's 1760 map and the first edition OS six-inch map may be buried beneath the existing road.

The potential impacts on industrial and cultural heritage are assessed in the EIAR document. A tramway (DCIHR 18-11-002, 18-16-007 and 18-16-030) ran from St. Stephen's Green to Donnybrook along the line of the Proposed Scheme in the 19th century. The Proposed Scheme also crosses the Grand Canal at Leeson Street Lower; the road is carried over the canal by Eustace Bridge which was constructed in c.1790. The bridge forms part of a group of extant canal related structures including a lock to the north, a tow path and mooring posts.

Section 15.4.1 of the EIAR identifies the main works impacting on archaeology and cultural heritage as being:

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

There will be minor public realm improvements in the vicinity of St. Stephen's Green park entrance, including repaving of the traffic island opposite it. Granite setts and granite kerbs

will be used here to complement the park entrance. The footpaths on the opposite junctions will also be repaved, utilising the existing granite setts and kerbs where possible.

The EIAR proposes that all subsurface archaeological and cultural heritage issues be resolved by archaeological mitigation during the pre-construction phase and/or construction phase, in advance of the operational phase, through one or more of the following mitigations:

- Preservation by record (archaeological excavation);
- Preservation in situ;
- Preservation by design; and
- Archaeological monitoring.

Section 15.5 of the EIAR proposes archaeological mitigation measures as follows:

- The NTA will procure the services of a suitably-qualified archaeologist as part of its Employer's Representative team administering and monitoring the works.
- The appointed contractor will make provision for archaeological monitoring to be carried out under licence to the DHLGH and the NMI, and will ensure the full recognition of, and the proper excavation and recording of, all archaeological soils, features, finds and deposits which may be disturbed below the ground surface. All archaeological issues will be resolved to the satisfaction of the DHLGH and the NMI. The appointed contractor will ensure that the archaeologist will have the power to inspect all excavation to formation level for the proposed works and to temporarily halt the excavation work, if and as necessary, having conferred with the NTA. They will be given the power to ensure the temporary protection of any features of archaeological importance identified. The archaeologist will be afforded sufficient time and resources to record and remove any such features identified in accordance with the licensing requirements agreed.
- Archaeological excavation ensures that the removal of any archaeological soils, features, finds and deposits is systematically and accurately recorded, drawn and photographed, providing a paper and digital archive and adding to the archaeological knowledge of a specified area (i.e. preservation by record). As archaeological excavation involves the removal of the archaeological soils, features, finds and deposits, following this mitigation measure there is no further impact on the archaeological heritage.
- Ground-breaking works in the environs of national monuments will require archaeological consent from the Minister of Housing, Local Government and Heritage (HLGH). There is one national monument in the vicinity of the Proposed Scheme, St. Stephen's Green. Mitigation measures, in this instance, will be archaeological monitoring of all ground-breaking, excavation or earth-moving works, under Ministerial Directions from the Minister, under the terms of the National Monuments (Amendment) Act 2004.
- In the case of cellars, coal cellars and/or basements, the appointed contractor in consultation with the archaeologist engaged by them will make provision for a geodetic survey and recording of each individual structure which will be subject to impact. This survey and recording will be carried out in advance of any construction works on the cellar, coal cellar and/or basement.
- The appointed contractor will make provision to allow for archaeological monitoring, inspection and excavation works that may arise on the site during the Construction Phase.
- 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 to the National Monuments Service at the DHLGH. In addition to a detailed method statement, the applications must include a letter from the NTA 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 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 NTA and the licensing authorities.
- Secure storage for artefacts recovered during the course of the monitoring and related work will be provided by the appointed contractor.
- 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.
- During the construction all machine traffic must be restricted as to avoid any newly revealed archaeological or cultural heritage sites and their environs. Materials management will be in operation to ensure no damage to a site of archaeological interest

Archaeological monitoring (as defined in section 15.5.1) under licence will take place, where any preparatory ground-breaking or ground reduction works are required (as defined in section 15.4.1), at all sites of archaeological and cultural heritage along the proposed route, including National Monuments, Recorded Monuments and sites listed in the DCIHR.

It is in these areas that there is a possibility to disturb intact archaeological layers and material. Licensed archaeological excavation, in full or in part, of any identified archaeological remains (preservation by record) or preservation in situ will be undertaken

Recommendations

See Appendix Below

2.4.4 Conservation Section Comments

Introduction

The following architectural heritage assessment has been carried out by the Conservation Section in the context of the Dublin City Development Plan 2022 – 2028, other key policy documents and best conservation practice. It is submitted that the following policies and provisions in particular should be taken into account in the consideration of all proposed routes and their impacts on the architectural and built heritage of the city:

Chapter 11 – Built Heritage and Archaeology, 11.1 Introduction, *'It is recognised that the city's built heritage contributes significantly to the collective memory of its communities and to the richness and diversity of its urban fabric. It is key to the city's character, identity and authenticity and vital social, cultural, and economic asset for the development of the city.'*

The city's historic buildings, streetscape villages, Georgian terraces and squares, Victorian and Edwardian architecture, industrial heritage, institutional landmarks, modernist buildings of the 20th century, urban core and the Medieval City, together with its upstanding monuments and buried archaeology contribute to its local distinctiveness and help create a strong sense of place for citizens and visitors to the city and its neighbourhoods.'

Section 11.5.1 Curtilage of a Protected Structure states *'The curtilage of a protected structure is often an essential part of the structure's special interest. In certain circumstances, the curtilage may comprise a clearly defined garden or grounds, which may have been laid out to complement the design or function.'*

It is the Policy of Dublin City Council:

BHA2: *Regarding Development of Protected Structures:*

'That development will conserve and enhance Protected Structures and their curtilage and will:

- a) Ensure that any development proposals to protected structures, their curtilage and setting shall have regard to the Architectural Heritage Protection Guidelines for Planning Authorities (2011) published by the Department of Culture, Heritage and the Gaeltacht.*
- b) Protect structures included on the RPS from any works that would negatively impact their special character and appearance.*
- e) Ensure that the form and structural integrity of the protected structure is retained in any development and ensure that new development does not adversely impact the curtilage or the special character of the Protected Structure.*
- h) Protect and retain important elements of built heritage including historic gardens, stone walls, entrance gates and piers and any other associated curtilage features.*
- i) Ensure historic landscapes, gardens and trees (in good condition) associated with the protected structures are protected from inappropriate development.'*

Section 11.5.2 Architectural Conservation Areas and Conservation Areas states: *'The Planning and Development Act, 2000 (as amended), provides the legislative basis for the protection of Architectural Conservation Areas (ACAs). Under the Act, an ACA is defined as a place, area, group of structures or townscape that is of special architectural, historical, archaeological, artistic, cultural, scientific, technical, social interest or value or contributes to the appreciation of protected structures.'*

Architectural Conservation Areas (ACAs) are designated in recognition of their special interest or unique historic and architectural character and important contribution to the heritage of the city. This character is often derived from the cumulative impact of the area's buildings, their setting, landscape and other locally important features which developed gradually over time...

The protected status afforded by inclusion in an ACA only applies to the exterior of structures and features of the streetscape.'

It is the Policy of Dublin City Council:

BHA7: *Regarding Architectural Conservation Areas:*

a) *To protect the special interest and character of all areas which have been designated Architectural Conservation Areas (ACA). Development within or affecting an ACA must contribute positively to its character and distinctiveness, and take opportunities to protect and enhance the character and appearance of the area and its setting, wherever possible. Development shall not harm buildings, spaces, original street patterns, archaeological sites, historic boundaries or other features, which contribute positively to the special interest of the ACA.*

d) *Seek the retention of all features that contribute to the character of an ACA including boundary walls, railings, soft landscaping, traditional paving and street furniture.*

'All trees which contribute to the character and appearance of an Architectural Conservation Area, in the public realm, will be safeguarded, except where the tree is a threat to public safety, prevents universal access or requires removal to protect other specimens from disease.'

It is the Policy of Dublin City Council:

BHA8: *Regarding Demolition in an ACA:*

'There is a presumption against the demolition or substantial loss of a structure that positively contributes to the character of the ACA except in exceptional circumstances where such loss would also contribute to a significant public benefit.'

Section 11.5.3 Z2 and Z8 Zonings and Re-Hatched Conservation Areas

'The Z8 Georgian Conservation Areas, Z2 Residential Conservation Areas and red-lined Conservation Areas are extensive throughout the city. Whilst these areas do not have a statutory basis in the same manner as protected structures or ACAs, they are recognised as areas that have conservation merit and importance and warrant protection through zoning and policy application.

...The special interest/value of Conservation Areas lies in the historic and architectural interest and the design and scale of these areas. Therefore, all of these areas require special care in terms of development proposals. The City Council will encourage development which enhances the setting and character of Conservation Areas.

As with Architectural Conservation Areas, there is a general presumption against the development which would involve the loss of a building of conservation or historic merit within the Conservation Areas or that contributes to the overall setting, character and streetscape of the Conservation Area. Such proposals will require detailed justification from a viability, heritage and sustainability perspective.'

It is the Policy of Dublin City Council:

BHA9: *Regarding Conservation Areas, enhancement opportunities may include:*

'3. Improvement of open spaces and wider public realm and reinstatement of historic routes and characteristic plot patterns.'

It is the Policy of Dublin City Council:

BHA10: *Regarding Demolition in a Conservation Area:*

'There is a presumption against the demolition or substantial loss of a structure that positively contributes to the character of the Conservation Area, except in exceptional circumstances where such loss would also contribute to a significant public benefit.'

It is the Policy of Dublin City Council:

BHA15: *Regarding Twentieth Century Buildings and Structures:*

a) *'To encourage the appropriate development of exemplar twentieth century buildings and structures to ensure their character is not compromised.'*

It is the Policy of Dublin City Council:

BHA16: *Regarding Industrial Heritage:*

a) *'To have regard to the city's industrial heritage and Dublin City Industrial Heritage Record (DCHIR) in the preparation of Local Area Plans and the assessment of planning applications...'*

Section 11.5.3 Protection of Historic Ground Surfaces, Street Furniture and Public Realm

'Dublin is fortunate to still retain impressive areas of historic street surfaces such as granite kerbing, granite pavement flags and granite and/or diorite setts, mainly but not entirely situated in the city centre. These along with other important historic features in the public realm such as milestones, city ward stones, street furniture, water troughs, post boxes, lampposts and railings make a special contribution to our built heritage. These items are often an integral part of the urban landscape or province significant historic references which greatly contribute greatly to the character of an area, especially where they complement the architectural features of protected structures, Architectural Conservation Areas and Z2, Z8 and Red-Hatched Conservation Areas.'

It is the Policy of Dublin City Council:

BHA18: *Regarding Historic Ground Surfaces:*

a) *'To protect, conserve and retain in situ historic elements of significance in the public realm including milestones, jostle stones, city ward stones, bollards, coal hole covers, gratings, boot scrapers, cast iron basement lights, street skylights and prisms, water troughs, street furniture, post boxes, lampposts, railings and historic ground surfaces including kerbs, pavement flags and setts and to promote conservation best practice and high standards for design, materials and workmanship in public realm improvements within areas of historic character, having regard to the national Advice Series on 'Paving: The Conservation of Historic Ground Surfaces (2015).'*

It is the Policy of Dublin City Council:

BHA24: *Regarding Reuse and Refurbishment of Historic Buildings:*

'Dublin City Council will positively encourage and facilitate the careful refurbishment of the historic built environment for sustainable and economically viable uses and support the implementation of the National Policy on Architecture as it relates to historic buildings, streetscapes, towns and villages, by ensuring the delivery of high quality architecture and quality place-making and by demonstrating best practice in the care and maintenance of historic properties in public ownership.'

It is the Policy of Dublin City Council:

BHA26: *Regarding Archaeological Heritage:*

(5) *'To preserve known burial grounds and disused historic graveyards. Where disturbance of ancient or historic human remains is unavoidable, they will be excavated according to best archaeological practice and reburied or permanently curated.*

(6) *'Preserve the character, setting and amenity of upstanding and below ground town wall defences.'*

Dublin City Tree Strategy 2016 – 2020

The Conservation Section would like to highlight that trees contribute significantly to the streetscape and character of the historic areas of the city, including the character and setting of Protected Structures, Architectural Conservation Areas and 'red-hatched' Conservation Areas, as provided in the Dublin City Development Plan 2022-2028.

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

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

The Conservation Section recommends that all mature and historic trees across the Bus Connects proposal and particular in close proximity to Protected Structures and within ACAs, Conservation Areas and areas zoned Z2 and Z8 in the Dublin City Council Development Plan 2022-2028 are retained and protected as far as practically possible. Where there is an unavoidable loss of historic trees, the NTA shall ensure that these are replaced with new semi mature trees to the satisfaction of DCC.

Architectural Heritage Protection Guidelines for Planning Authorities (2011)

Consideration of proposals affecting boundary features:

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

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

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

14.4.1 Street Furniture and Paving

'An item of street furniture may be protected by being included in the RPS in its own right where it is special or rare; as part of the curtilage of a Protected Structure; or as part of an ACA. Such items could include lamp standards, seats and benches, bollards, railings, street signs, iron signposts, free standing or wall mounted post boxes, telephone kiosks, horse

troughs, water pumps, drinking fountains, jostle stones, milestones, paving, kerbstones, cobbles and setts, pavement lights, coal hole covers, weighbridges, statues and other monuments.'

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

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

Assessment

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

- Protected Structures and Proposed Protected Structures and their settings
- Buildings and other structures (post boxes/milestones etc.) and historic landscapes included on the National Inventory of Architectural Heritage (NIAH)
- Structures included in the Dublin City Industrial Heritage Record Survey (DCIHR)
- Other unprotected structures that contribute positively to the architectural heritage and character of streetscapes
- Architectural Conservation Areas (ACAs) and Conservation Areas
- Lands zoned Z2 in the Dublin City Development Plan 2022-2028, which aims to *'protect and / or improve the amenities of residential conservation areas'*
- Lands zoned Z8 in the Dublin City Development Plan 2022-2028, which aims *'to protect the existing architectural and civic design character, and to allow only for limited expansion consistent with the conservation objective'*
- Historic Paving and Kerbing

General Response

The Conservation Section finds that a thorough study of the receiving environment has been carried out. The EIAR package includes a suite of architectural heritage reports that document the subject area in detail. Appendix A16.1 Historical Background provides a well-researched discussion on the history of the development of the route. Appendix A16.2 Inventory of Architectural Heritage Sites provides a written and photographic record, importance rating and sensitivity rating for all protected structures, NIAH-recorded structures, designed landscapes, unprotected structures of built heritage significance, street furniture, paving and surface treatments along the route. The record is comprehensive and accurately describes the quality and status of the heritage structures. Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric 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. In Section 1.1, the writer of the report notes that *"All features and materials of importance to maintain the character of the historic built environment should be retained including features of all ages (DCC 2014, DELG 2000),"* and that *"Architectural heritage features such as buildings, boundary treatments, working quays, stone setts, cobbles, paving and other heritage artefacts such as street furniture have been retained in situ where possible in the design of the Proposed Scheme."*

A description of the proposed bus connects scheme is provided in the Non-Technical Summary document (p.13) which states: *“The Proposed Scheme has an overall length of approximately 18.5km. It will commence at the St. Stephen’s Green / Leeson Street Lower Junction and will run along the R138 (Leeson Street Lower / Leeson Street Upper / Sussex Road / Morehampton Road / Donnybrook Road / Stillorgan Road), and includes a bus interchange facility at the Stillorgan Road entrance to UCD. It continues along the N11 (Stillorgan Road / Bray Road), R837 Dublin Road, R119 Dublin Road and R761 (Dublin Road / Castle Street), ending at the northern side of the Fran O’Toole Bridge in Bray, where it will tie into the proposed Bray Bridge Improvement Scheme”.* Please note the following assessment relates to the scheme where it runs within Dublin City Council’s boundary between St. Stephen’s Green and the N11 flyover at University College Dublin.

Key Impacts

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

- Protected Structures and their settings
 - a) Numerous Protected Structures are included on the subject map sheets. These structures are located on or adjacent to the route boundary.
 - b) The route will pass by a number of protected structures including Real Tennis Court (RPS 4452), National Concert Hall main building and boundary treatments (RPS 2425), the boundary treatments of St. Stephen’s Green (RPS 7752), 1-4 Leeson Street Lower (RPS4388-4391), 20-52 Leeson Street Lower (RPS ref. 4392-4424), 63-81 Leeson Street Lower (RPS ref. 4425-4443), 89-97 Leeson Street Lower (RPS ref. 4444-4452), 1-12 Hatch Street Lower (3624-3625), 29-31 Hatch Street Lower (RPS ref. 3643-45), Hatch Hall (RPS ref. 3642), 23-28 Hatch Street Lower (RPS ref. 3636-3641), 17-21 Pembroke Street Upper (RPS ref. 6665-6669), 10-16 Pembroke Street Upper (RPS 6658-6664), Eustace Bridge (RPS 873), 1-17A Leeson Street Upper (RPS ref. 4455-4472), 18-43 & 45-59 Leeson Street Upper (RPS ref. 4473-4513), 65-75 Leeson Street Upper (RPS ref. 4514-4526), 76-98 Leeson Street Upper (RPS ref 4527-4549), 104-109 Leeson Street Upper (RPS ref. 4554-4559), 114-140 Leeson Street Upper (RPS ref. 4560-4586), 147-156 Leeson Street Upper (RPS 4591-4600), 8-9 Sussex Terrace (RPS ref. 7909), Christ Church Leeson Park (RPS ref. 4347), 1-68 Morehampton Road (RPS ref. 5286-5347), 70-78 (even nos. only) Morehampton Road (RPS ref. 5348-5351), 4-8 (even nos. only) Herbert Park (RPS ref. 3680, 3682, 3684), Sacred Heart Catholic Church (RPS 7845), Mount Errol House (RPS ref. 7846), RTE Campus: 5 buildings comprising: (1) Television Building, 1962 and 1979 extension; (2) Scene Dock Building c. 1965-69 (exterior and lightweight trussed roof structure); (3) Restaurant Building c. 1965 (excluding later extension); (4) Administration Building, 1967 (excluding later extension); and (5) Radio Building, 1973 (RPS ref. 8888), Montrose House (RPS ref. 7847).
 - c) 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.
- NIAH Structures and their settings

- a) All NIAH Structures in close proximity to construction works are to be adequately protected and all proximate works are to be supervised by a conservation professional including works proximal to Real Tennis Court (NIAH 50920269), National Concert Hall (NIAH 50920271), the boundary treatments of St. Stephen's Green (NIAH ref. 50100148), 1-5 Leeson Street Lower (NIAH ref. 50920272-76), 63-81 Leeson Street Lower (NIAH ref. 50930245-59, 50930294-99), 89-89 Leeson Street Lower (NIAH ref. 50930307-15), 20-52 Leeson Street Lower (NIAH ref. 50110483-511, 50110292-5), 100-103 Leeson Street Lower (NIAH ref. 50920296-99), post box outside 25 Fitzwilliam Place (NIAH 50930153), 1-12 Hatch Street Lower (NIAH ref. 50920315, 50920280-90), 29-31 Hatch Street Lower (NIAH ref. 50110512-14), Hatch Hall (NIAH ref. 50110515), 23-28 Hatch Street Lower (NIAH ref. 50110516-21), post box outside 24 Leeson Street Lower (NIAH ref. 50920291), 17-21 Pembroke Street Upper (NIAH ref. 50930290-94), 10-16 Pembroke Street Upper (NIAH ref. 50930239-45), Eustace Bridge (NIAH ref. 50930261, 50110528), Grand Canal Lock at Eustace Bridge (NIAH ref. 50110527).
 - b) Proposed paving and urban realm works will be located in close proximity to the Former Waterworks building on Leeson Street Lower (NIAH ref. 50110481), which pose a potential risk of damage. Recording, protection and monitoring of the milestones, overseen by a suitably qualified conservation professional is proposed during the construction phase.
 - c) A proposed relocated coach stop and shelter will be located proximal to gates, gate lodge, and demesne boundary wall to Thornfield, Stillorgan Road (CBC0013BTH105, NIAH Garden Survey ref. 2425). Recording, protection and monitoring of the historic features overseen by a suitably qualified conservation professional is proposed during the construction phase.
- Architectural Conservation Areas
 - The proposed route will pass through one Architectural Conservation Area, the Belmont Avenue and Mount Eden Road ACA as indicated on the Dublin City Council Development Plan 2022-2028 map.
 - The EIAR describes impacts of the proposed scheme on the Belmont Avenue and Mount Eden Road ACA as indirect, including impacts associated with paving, landscaping and urban realm works at the junctions of Belmont Avenue and Mount Eden Road. Proposed works in this area may result in accidental damage to the protected structures or heritage features in the ACA. Recording, protection and monitoring of the historic features overseen by a suitably qualified conservation professional should be undertaken.
 - Red Hatch Conservation Areas, Z2 and Z8 Zonings
 - The proposed route will run through a number of red hatch Conservation Areas including St. Stephen's Green, Leeson Street Lower, Grand Canal and Dodder River.
 - Temporary land acquisition is proposed outside the south-east entrance to St. Stephen's Green, in close proximity to the entrance gates and boundary treatments which form part of the protected structure (RPS ref. 7752) and are located within the Red Hatch Conservation Area. Proposed works in this area may result in accidental damage to the protected structures and their boundary treatments.

Recording, protection and monitoring of the historic features overseen by a suitably qualified conservation professional should be undertaken.

- The EIAR states that the proposed scheme will have an indirect, negative impact on the Leeson Street Lower red hatch Conservation Area, the magnitude of which is medium. Proposed paving, landscaping and urban realm works and the removal of trees at the junction of Leeson Street Lower, Fitzwilliam Place, Wilton Terrace and Adelaide Road have the potential to adversely impact the character of the conservation area. The installation of the proposed concrete paving may result in accidental damage to protected structures and their boundary treatments. The Conservation Section agrees with the level of impacts identified in the EIAR on the architectural heritage of the red hatch Leeson Street Lower Conservation Area.
 - The EIAR states that the proposed scheme will have an indirect, negative impact on the Grand Canal red hatch Conservation Area, the magnitude of which is medium. Proposed paving, landscaping and urban realm works at Leeson Street Lower, Wilton Terrace, Grand Parade, Mespil Road, Eustace Bridge and Leeson Street Upper have the potential to adversely impact the character of the conservation area. The installation of the proposed concrete paving may result in accidental damage to protected structures and their boundary treatments. The Conservation Section agrees with the level of impacts identified in the EIAR on the architectural heritage of the red hatch Grand Canal Conservation Area.
 - The EIAR states that the proposed scheme will have an indirect, negative impact on the red hatch Dodder Conservation Area, the magnitude of which is medium. Proposed paving, landscaping and urban realm works at Donnybrook Road, Anglesey Bridge, Beaver Row, Stillorgan Road and Anglesea Road have the potential to adversely impact the character of the conservation area. The installation of the proposed concrete paving may result in accidental damage to protected structures and their boundary treatments. The Conservation Section agrees with the level of impacts identified in the EIAR on the architectural heritage of the red hatch Dodder Conservation Area.
 - The route will run along the boundaries of a number of areas zoned Z2 between the Grand Canal and the local authority boundary at Stillorgan Road including Leeson Street Upper, Sussex Road, Morehampton Road, and the north-west end Stillorgan Road.
 - The route will run along the boundaries of a number of areas zoned Z8 between St. Stephen's Green and the Grand Canal including St. Stephen's Green, Earlsfort Terrace, Leeson Street Lower, Hatch Street Lower.
- Industrial Heritage Sites
 - a) Industrial heritage structures, recorded in the DCHIR are located within the development area. These include: Sections of tramway on Earlsfort Terrace, Leeson Street Lower, Leeson Street Upper, Morehampton Road, Donnybrook Road (DCIHR 18_11_002, DCIHR 18_15_030, DCIHR 18_16_007; 22_04_001); a Waterworks Pressure Stations on Leeson Street Lower (DCIHR 18_15_031); Eustace Bridge on the Grand Canal (DCIHR 18_15_001); a smithy on Morehampton Road (DCIHR 16_16_030); Anglesea Bridge on the Dodder (DCIHR 22_04_004); tramway depot, Engine Houses and site of quarry on Stillorgan Road (DCIHR 22_04_011, DCIHR 22_04_012, DCIHR 22_04_003, DCIHR 22_04_010).

- Potential impacts on historic paving and kerbing, historic street furniture and lamp standards and other features:

Lamp Posts and Tram Standards:

- The EIAR has identified late 19th century lantern gas lamps in St. Stephen's Green, Scotch Standards at Leeson Street Lower, Pembroke Street, and Fitzwilliam Place; tram standards at Eustace Bridge, Leeson Street Upper, Morehampton Road, Donnybrook Road, and Eglinton Road; a swan neck standard at Belmont Avenue, and reproduction lamp standards at Wellington Place and Adelaide Road.
- Nineteen of the lamp posts and tram standards will be directly impacted during the construction phase and will require repositioning to accommodate urban realm improvements. There is potential for damage to the lamp posts during their removal, transportation, storage and reinstatement. The magnitude of impact would be high. Removed or repositioned historic lamp posts and tram standards shall be reinstated at setback location, pending agreement on more detailed design with the Planning Authority's Conservation Section and having regard to the provisions of the Architectural Heritage Protection Guidelines for Planning authorities (2011) and the relevant DHLGH Advice Series publication(s).
- The remaining thirty-two lamp posts and tram standards will be retained in position. There is also potential for damage of these lamps during construction.

Milestones:

- There is a milestone at Morehampton Road (CBC0013MS003) and a milestone with county boundary marker (CBC0013MS002). Changes associated with the proposed scheme are proposed in the vicinity of the milestones and there is a potential risk of damage during the construction phase. Recording, protection and monitoring of the milestones, overseen by a suitably qualified conservation professional is proposed during the construction phase.

Historic Paving, Surface Finishes and Other Street Furniture:

- Paving of architectural heritage value was identified at five locations in the study area. Direct Construction Phase impacts on paving are noted at one location involving the removal of historic granite kerbstones on Donnybrook Road (CBC0013BTH117). The granite 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. All historic finishes shall be reinstated at setback location, pending agreement on more detailed design with the Planning Authority's Conservation Section and having regard to the provisions of the Architectural Heritage Protection Guidelines for Planning authorities (2011) and the relevant DHLGH Advice Series publication(s).
- Further granite kerbstones are located on Leeson Street Lower, Leeson Street Upper, Donnybrook Road and at Anglesey Bridge. While no direct impacts are proposed at this locations, there is a potential for damaged during the construction phase. Recording, protection and monitoring of the milestones, overseen by a suitably qualified conservation professional is proposed.

- Coal hole covers and cellar hatches in granite surrounds are located on the east and west sides of Leeson Street Lower and the west end of Pembroke Street Upper. While no direct impacts are proposed at these locations, there is a potential for damage during realignment of the footpaths and installation of new paving treatments. Recording, protection and monitoring of the milestones, overseen by a suitably qualified conservation professional is proposed.
 - Proposed works are proposed in close proximity to Carnac Sculpture at Leeson Street Upper (CBC0013BTH157) and to the Obelisk Anglesea Road (CBC0013BTH113) will require the replacement of ground surfaces with potential for damage to the features during the construction phase. Recording, protection and monitoring of the historic features overseen by a suitably qualified conservation professional is proposed.
- **Boundary Treatments**
 - The Conservation Section notes that where works may require the removal of existing roadside boundary walls, railings, entrances gates and hedgerows, together with areas of existing garden plantings garden trees, paving and garden features, new boundary walls, railings, entrances gates and hedgerows to match existing shall be reinstated at setback location, pending agreement on more detailed design with the Planning Authority's Conservation Section and having regard to the provisions of the Architectural Heritage Protection Guidelines for Planning authorities (2011) and the relevant DHLGH Advice Series publication(s).
 - Proposed land acquisition and a new coach stop to the south of Mount Errol (RPS ref. 7846) will require the realignment of the boundary wall along the Stillorgan Road. The boundary wall appears to have been rebuilt in associated with the widening of the carriageway. Nonetheless, all works shall be reinstated at setback location, pending agreement on more detailed design with the Planning Authority's Conservation Section and having regard to the provisions of the Architectural Heritage Protection Guidelines for Planning authorities (2011) and the relevant DHLGH Advice Series publication(s).
- **Cycle Lanes**
 - The Conservation Section request that where the cycle ways are located in close proximity to Protected Structures and within Conservation Areas generally, that an alternative high quality cycle lane surface is provided in-lieu of red tarmacadam.
- **New Traffic Semaphore & Signage**
 - The proposed new bus lanes and routes may require additional traffic semaphores and signage. Careful consideration shall be given to the siting of associated utilities and traffic management signage in relation to Protected Structures and Conservation Areas, historic paving and historic street furniture and should be kept to the necessary minimum. Consideration should 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. It is recommended that gantry traffic signage in the vicinity of Protected Structures, within red hatched conservation areas and residential conservation areas be omitted and alternative traffic signage solutions should be sought.

- New traffic signalling poles
 - It is recommended that cantilevered signal poles in the vicinity of Protected Structures, within Conservation Areas, red hatched conservation areas and residential conservation areas be omitted and alternative traffic signalling solutions should be sought where these are proposed; particularly at the junction of St. Stephen's Green East and Leeson Street Lower; Leeson Street Upper and Grand Parade and the junction of Appian Way.

- Proposed Bus Stops
 - The Conservation Section has reviewed the route in relation to proposed and existing bus stops and shelters.
 - The location, form and materials of the proposed bus stops / shelters / information posts has the potential to impact upon the character and setting of Protected Structures and Conservation Areas.
 - Mitigation will be required to mitigate the visual impact of bus stops / shelters / information posts sited near or fronting Protected Structures and Architectural Conservation Areas. It is recommended that the proposed bus shelters in front of No. 40 Morehampton Road, No. 92 Morehampton Road, No. 117 Morehampton Road are omitted and that the extant fingerpost bus stops are retained in these locations.
 - The treatment of new kerbing and paving associated with the provision of bus stops / shelters / information boards should be appropriate in material and colour to the location, particularly where adjacent sections of historic stone paving and kerbing exist in situ.
 - The alignment of footpaths should respect the setting of Protected Structures and buildings on the NIAH.

- Significant Trees
 - The submitted Arboriculture Report (see Appendix A17.1) and Photomontages (see Chapter 17, Figure 17.2.25.1-17.2.25.2) indicate a group of four significant street trees will be removed that would detrimentally impact the setting of Protected Structures at 86-94 Leeson Street Upper (RPS 4537-4545). The applicant shall reinstate the trees upon completion of the works.

- Construction Compounds
 - There are no construction compounds relating to the scheme within the DCC area.

Recommended Conditions

These are set out in the Appendix below.

2.4.5 City Architects Division Comments

The City Architects Division welcomes in principal the objectives of the Proposed Scheme to support integrated sustainable transport use through infrastructure improvements for active travel (both walking and cycling), and the provision of enhanced bus priority measures. The Proposed Scheme will facilitate the modal shift from car dependency through the provision of walking, cycle, and bus infrastructure enhancements thereby contributing to an efficient, integrated transport system and facilitating a shift to a low carbon and climate resilient city.

The Scheme notes that proposals for public realm upgrades, including widened footpaths, high quality hard and soft landscaping to contribute towards a safer, more attractive environment for pedestrians are included, and that it has been developed having regard to relevant accessibility guidance and universal design principles so as to provide access for all users.

The City Architects Division wishes to comment on the proposals, noting the following:

- The design of the public realm will be fundamental to the success of the Proposed Scheme.
- This design needs to be supported by pedestrian traffic counts to ensure that footpaths are of sufficient width to safely accommodate anticipated pedestrian volumes and to provide for ancillary public realm infrastructure such as tree-planting, greening and street furniture, as well as traffic infrastructure such as bus shelters, utility cabinets, and cycle stands etc. Footpaths should be designed to be universally accessible and pedestrian environments enhanced.
- As part of the proposals, all historic fabric and features should be retained and protected, and the settings of protected structures and buildings within Architectural Conservation Areas (ACA's) should be respected insofar as possible within the Proposed Scheme.
- Generally, existing survey drawings are submitted with a project to facilitate analysis and the extent of intervention in a proposal. The General Arrangement Drawings submitted as part of the National Transport Authority's Bray to City Centre Core Bus Corridor Scheme are drawn at a scale of 1:500@A1 and do not include an overlay of existing survey drawings.

The inclusion of an overlay of existing survey drawings onto the General Arrangement Drawings as submitted for the Bray to City Centre Core Bus Corridor Scheme would have facilitated a better assessment of the impacts of the proposals on the existing public realm.

This issue was raised in previous City Architects commentary.

- Comments will generally be confined to proposed physical interventions in the public realm only, with minimal or no commentary on traffic routing or modelling.
- Where drawings are referenced in the commentary, the relevant Drawing Sheet no. from Volume 3, Figures, Chapter 4.2 General Arrangement Drawings is included for ease of reference.
- Local Authority Boundaries: The boundaries between all local authorities should be indicated on all drawings where applicable.

Building Conservation Legislation

As this route involves works to and/or adjacent to Protected Structures their curtilage incl. Historic Fabric and within Conservation Areas:

The applicant is to confirm that all works proposed must comply with Part IV of the Planning and Development Act 2000. This includes guidelines under S.52 (1) for the protection of structures, or parts of structures, and the preservation of the character of architectural conservation areas.

For reference, in December 2004, the Minister for the Environment, Heritage and Local Government published guidelines under S.52 (1) entitled Architectural Heritage Protection Guidelines for Planning Authorities which incorporated the S.52 (2) guidelines as Chapter 5.

Previous commentary by the City Architects Division on the BusConnects Core Bus Corridor Scheme

City Architects Division previously submitted detailed comments and recommendations on the BusConnects Core Bus Corridor Scheme to the Dublin City Council BusConnects Liaison Team on the following dates:

- 25th May 2019, City Architects comments on BusConnects CBC 'preferred routes', published for Round 1 of public consultation.
- 25th February 2020, City Architects Comments on BusConnects proposals, timelines, and information required.
- 18th April 2020, City Architects Comments on BusConnects CBC 'preferred routes', published for Round 2 of public consultation.
- 7th January 2021, City Architects Comments on BusConnects CBC 'preferred routes', published for 3rd Round of public consultation,

and in addition to the following studies:

- 5th August 2020, BusConnects Junction Study of 16 CBC routes.
- 5th August 2020, BusConnects CBC Civic Spine and Civic Space Study.
- 1st October 2020, Footpath Study of Routes 13 & 7.

Commentary by the City Architects Division on the BusConnects Ringsend to City Centre Core Bus Corridor Scheme, as submitted by the National Transport Authority to An Bord Pleanála

Commentary by the City Architects Division on the Proposed Scheme is limited to a review of the following documents only contained within the Environmental Impact Assessment Report of the planning documentation:

Volume 1, Non-technical Summary
Volume 2, Chapter 4 Proposed Scheme Description
Volume 3, Figures, Chapter 4.2 General Arrangement
Volume 3, Figures, Chapter 4.4 Typical Cross Sections
Volume 3, Figures, Chapter 4.5 Landscaping General Arrangements
Volume 3, Figures, Chapter 4.9 Street Lighting
Volume 3, Figures, Chapter 4.10 Junction System Design
Volume 3, Figures, Chapter 17.2 Photomontages

Comments/Conditions

1. Footpath widths & alignment:

- i. The provision of footpaths designed to the minimum width may not be sufficient in areas of high pedestrian traffic particularly in urban villages and busy commercial streets e.g. Morehampton Rd, west side, in front of commercial units no. 75 to 105 (Sheet 6) & Donnybrook Road, east and west side (Sheet 7).

- ii. Footpath widths also need to account for congregations of passengers waiting in the vicinity of bus stops and pedestrians travelling along the footpath.
- **By condition, confirmation is requested that pedestrian traffic counts have been undertaken to ensure that the proposed footpath widths along the Proposed Scheme are sufficient to cater for anticipated pedestrian volumes. This confirmation should be submitted to the planning authority prior to commencement of development.**

2. Local Public Realm Improvement Schemes:

- i. The Proposed Scheme includes a plan drawing of proposed public realm improvements within the Dublin City Council Boundary at;
 - (a) Leeson St to Eustace Bridge
Image 4.1: Proposals Either Side of Eustace Bridge pg 11 & Image 4.2: The integration of Dedicated Cycle Lanes and Bus Stop Facilities at Leeson Street Upper, pg 12 & Image 4.3: Widened and Enhanced Footway Near Sussex Terrace, pg 13, Volume 2, Chapter 4 Proposed Scheme Description.
 - (b) Leeson St Upper to Wellington Place
Image 4.4: Wellington Place Local Enhancement, pg 14 & Image 4.5: Morehampton Road Showing Retained Access to Driveways and retention of High Quality Tree on South Side, pg 15 & Image 4.6: Morehampton Rd Near Herbert Park Junction, pg 16 & Image 4.7: Donnybrook Retail Area, pg 17 & Image 4.8: Donnybrook Retail Area, Mulberry Lane, pg 18 & Image 4.9: Donnybrook Road, Rampart lane and Eglington Terrace Junction Enhancements pg 19, Volume 2, Chapter 4 Proposed Scheme Description.

The information provided is insufficient to facilitate proper assessment of the proposals and additional information is required including visualisations of the proposals.

- **By condition, as these interventions are considered important, detailed drawings and specifications of the proposed public realm improvement schemes shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.**

3. 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.

- **By condition details of all landscaping and public realm finishes in areas where they are to be taken in charge shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.**

4. Bus Shelter Design:

- (a) A discrepancy in the documents has been noted:
 - (i) A bus shelter is shown in visualisation View 24b Proposed, Figure 7.2.25.2, Volume 3, Figures, Chapter 17.2 Visualisations, which is not indicated on the General Arrangement, Sheet 07.
 - (ii) A bus stop and shelter is shown in Visualisation 28 Proposed, Figure 7.2.25.2, Volume 3, Figures, Chapter 17.2 Visualisations, which is not indicated on the General Arrangement, Sheet 04.

It is assumed that bus stops and bus shelters are proposed only at the locations indicated on the General Arrangement Drawings, Volume 3, Figures, Chapter 4.2 General Arrangement.

- (b) 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. It is unclear if there is sufficient width to the footpaths in some locations where bus shelters are proposed e.g. 40 Morehampton Road (Sheet 05).
- (c) Where bus shelters are proposed their locations must have regard to existing building entrances.
- (d) Where bus shelters are proposed and space exists on the bus island the bus shelters should be located on these islands rather than on the footpath where the width is already constrained by the design of the bus stop, for example 40 Morehampton Road (Sheet 05).
- (e) Bus shelter locations are indicated on the drawings but information on their proposed design, size and type is not provided.
- **By condition, full details of the design and type of each bus shelter for each location shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.**
- (f) The proposed location of bus shelters in the vicinity of buildings of architectural importance and in Conservation Areas needs to be considered carefully. Bus stops only rather than bus shelters would be preferable in Conservation Areas. The vistas and settings of Protected Structures are also impacted by the proposed siting of bus shelters in their vicinity.
- **By condition, full details of the design and type of each bus shelter for each location along the Proposed Scheme shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.**
- (g) In the interest of visual amenity and having regard to protected structures and their settings, advertisements should not be permitted on bus shelters in Architectural Conservation Areas (ACA), Conservation Areas, Residential Neighbourhoods (Conservation Areas) or Special Planning Control Schemes (SPCS).

- **By condition, full details of the design and type of each bus shelter for each location along the Proposed Scheme shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.**

5. Siting of utility cabinets and above-ground utility infrastructure:

- (a) 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.
- (b) This issue has been a significant problem on previous transport infrastructure projects.
- **By condition, the siting of all utility cabinets and other above-ground utility infrastructure shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.**

6. On-street Parking:

(a) The roll-out of electric charging points for electric vehicles is required if national carbon emissions plans are to be met.

- **By condition, the NTA should engage with electrical charging operators to coordinate the roll out of electrical charging points to on-street parking areas as part of the works along the route of the Proposed Scheme. This shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.**

7. Palette of materials:

(a) It is submitted that the replacement of all the existing hard landscape surfaces with new may not be required, nor may it be financially feasible or sustainable.

- **By condition, the extent of existing hard landscape to be retained within the Proposed Scheme shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.**

(b) Stone or concrete sett paving is proposed for the raised tables at side road entries and parking bays. All proposed materials are to be agreed and approved by Dublin City Council, Environment & Transport Department.

- **By condition, the material palette within the Proposed Scheme shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.**

8. Palette of street furniture:

- (c) A full palette of street furniture to include street lighting, bins, benches, bollards, cycle stands, wayfinding poles, digi-panels etc and confirmation on their proposed locations is required.
- (d) Confirmation is sought as to whether an identical palette is to be used for the Proposed Scheme across all the local authority administrative areas or whether each local authority (and perhaps specific urban villages) will have their own palette.
- (e) Confirmation is sought as to whether there will be uniformity in the palette of street furniture across all the BusConnects Core Bus Corridor Schemes.

- **By condition, a full palette of street furniture and their proposed locations across all the proposed BusConnects Core Bus Corridor Schemes, shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.**

9. Boundary treatments:

- (a) Where property boundaries along the route are to be relocated to facilitate land acquisition, the fabric in the existing boundaries should be assessed for their architectural conservation value and cultural value.
- **By condition, the fabric in all property boundaries which are to be relocated to facilitate land acquisition along the Proposed Scheme should be assessed for their architectural conservation value and cultural value. This assessment should be submitted to, and agreed in writing with, the planning authority prior to commencement of development.**
- (b) The assessment should confirm whether the fabric, which may include railings, walls etc. is suitable for repair and re-use for sustainability reasons in the new boundaries rather than replaced with new.
- **By condition, the fabric in all property boundaries which are to be relocated to facilitate land acquisition along the Proposed Scheme should be assessed whether it may be suitable for repair and re-use for sustainability reasons in the new boundaries rather than replaced with new. This assessment should be submitted to, and agreed in writing with, the planning authority prior to commencement of development.**

10. Per cent for Art Strategy:

1. It is not clear where the Percent for Art Strategy is to be incorporated into this project.
 - **By condition, the selection and location of artworks along the route as part of the Percent for Art strategy shall be reviewed and agreed with the local authority Arts Office and submitted to, and agreed in writing with, the planning authority prior to commencement of development.**

11. Concrete and Painted Medians:

- (a) Areas of concrete medians in the Proposed Scheme should be reviewed to provide additional greening where possible e.g. Junction of Burlington Rd & Leeson St Upper (Sheet 04) & junction of Waterloo Rd and Morehampton Rd (Sheet 04).
- (b) The painted median along Sussex Road should be reviewed to provide additional greening between Sussex Terrace and Burlington Road if possible or alternatively the median space removed and reallocated into the footpaths adjacent.
- **By condition, all proposed medians should be reviewed to ascertain if they could provide additional greenery or alternatively if the median space could be removed and reallocated into the footpaths adjacent. This shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.**

12. Traffic Signal & Signage Poles:

(a) The number of poles installed to provide traffic signals for pedestrians, cyclists, buses and other vehicles needs to be rationalised to the minimum required at each junction.

(b) The photomontages provided for the scheme do not show the full number of proposed traffic signal poles at junctions e.g. View 25 Proposed, Figure 7.2.25.2, Volume 3, Figures, Chapter 17.2 Visualisations. The visualisations should be resubmitted showing all proposed traffic signage to properly assess the visual impact of the traffic signals along the proposed scheme.

- **By condition, the number of poles required for traffic signal and signage needs to be designed to the minimum. This information shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.**

13. Gantry Signage – Traffic Signals: Discrepancy in documents submitted

(a) Chapter 04 proposed Scheme Description, Section 4.6.10 Other Street Infrastructure, Section 4.6.9.1.2 Gantry Signage states that “No new gantry signage is included in the proposed Scheme”. It is considered that gantry signage is not suitable in low speed areas such as Donnybrook Village & Leeson St, and particularly Conservation Areas (Leeson St Lower & St Stephens Green) due to their high visual impact.

The following is a non-exhaustive list of locations where gantry poles are proposed for traffic signals in the Proposed Scheme.

Gantry traffic signal signage are indicated at the junction of -

- St Stephens Green East & Leeson St Lower, Sheet 08, Volume 3, Figures, Chapter 4.10 Junction System Design.
- Leeson St Upper & Grand Parade, Sheet 11, Volume 3, Figures, Chapter 4.10 Junction System Design.
- Morehampton Rd & Bloomfield Ave, Sheet 18, Volume 3, Figures, Chapter 4.10 Junction System Design.
- Morehampton Rd & Herbert Park, Sheet 19, Volume 3, Figures, Chapter 4.10 Junction System Design.

(b) The photomontages provided for the scheme, do not show the full extent of proposed gantry traffic signals and traffic signals at junctions e.g. View 25 Proposed, Figure 7.2.25.2, Volume 3, Figures, Chapter 17.2 Visualisations. The visualisations should be resubmitted showing all proposed gantry traffic signage to properly assess the visual impact of the gantry traffic signals on the settings and views of the protected structures along the proposed scheme.

- **By condition, gantry traffic signage should not be included in the scheme due to their high visual impact and alternative traffic signage solutions should be investigated. Photomontages to be re-submitted showing any proposed gantry traffic signals. This information shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.**

14. Water Drinking Fountains:

(a) In order to reduce plastic waste and promote sustainability, a strategy for the roll-out of water drinking fountains, such as the recently installed model on Clarendon Row, should be incorporated into the Proposed Scheme at suitable locations and in consultation with Dublin City Council.

- **By condition, suitable locations for water drinking fountains should be identified and installed as part of the works along the route of the Proposed Scheme. This shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development**

15. Village Signage

- (a) Existing 'Welcome to Village xxx' signage provide local wayfinding landmarks and should be retained as part of the Proposed Scheme, in agreement with the local authority and community e.g. 'Welcome to Donnybrook' at the junction of Morehampton Rd and Wellington Place, Sheet 04.
- (b) The Proposed Scheme presents an opportunity to implement a scheme of city wide co-ordinated village signage, in collaboration with the relevant local authority and Area Offices, as part of the overall Bus Connects Core Bus Corridor Project.

- **By condition, village signage should be incorporated into the Proposed Scheme, and a scheme of city wide co-ordinated village signage should be undertaken and shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.**

2.4.6 City Parks, Biodiversity and Landscape Division Comments

1. Agreement on taking in charge of landscape components of the proposals by DCC Park Services will require liaison and agreement on layout and planting details prior to implementation. Amendments to planting proposals may be required to comply with Park Services contract maintenance requirements.
2. All landscape components of the proposals will require contract maintenance for a minimum of 3 years following completion of the works or any work phases. Landscape areas agreed to be taken in charge will require full completion of the 3 year maintenance period and rectification of any defects or loss of planting.
3. Tree risk assessment is to be carried out at end of year 1 and year 3 following completion of the works to identify any potential risks arising to the public or property, on retained trees within the project areas. Remedial works to trees shall be completed prior to taking in charge.
4. Tree planting proposals are welcome within the proposals however the constraints of overhead and underground services on this planting and other constraints, such as planting close to existing boundaries should be realistically assessed at detail design stage.

5. Clarity is required on the proposed quantity of compensatory public street tree planting along the route in comparison to the proposed removal of existing street trees. If appropriate compensatory planting falls below the loss of existing street trees then other forms of compensation shall be agreed with DCC Park Services.
6. The implementation of the arboricultural and landscape proposals will require the professional input of Arboriculturists and Landscape Architects appointed by the project proponent for the full duration of project work contracts. Construction details for components of the project that will be taken in charge shall be agreed at design stage with Park Services.
7. Tree protection measures for all existing trees shall be put in place prior to the commencement of development or phases of development. Where existing trees require remedial measures to alleviate risk to the users of the completed development, then these shall be completed by the project proponent. The project proponent shall be required to fund tree remedial works or tree replacement works where existing trees retained decline or fail within 5 years of the completion of the project or project phases.
8. Please indicate local authority administration boundaries on all further submitted plans.

Specific comments:

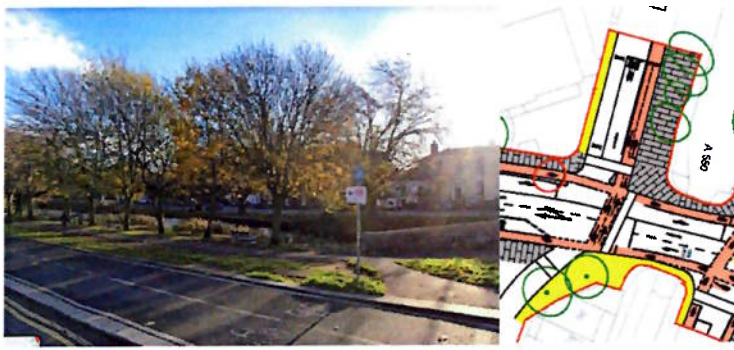
1. Landscape General Arrangement

Sheet 1: All paving works should use granite surfaces and kerbing to DCC standards to reflect the quality of the St Stephens Green and Leeson Street environment.

Hatch Street Lower: The drawings inaccurately omit existing trees. No tree removals are permitted at this location.



Sheet 2: Existing grass verge shall be retained to root protection areas for existing canal-side trees at Wilton Terrace. Hard surfacing proposed shall be omitted.

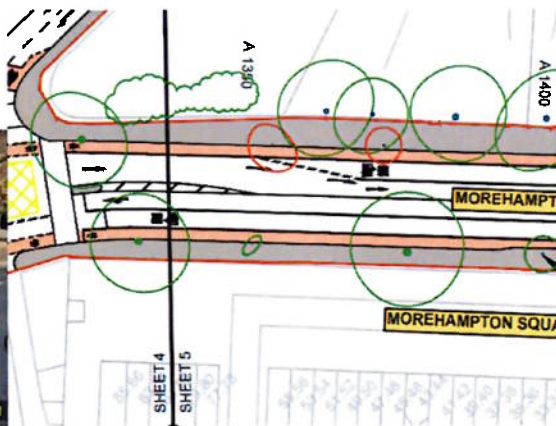


Sheet 3: details of tree pit surface amendments to be forwarded to DCC Park services for review. Note that any proposals should avoid creating trip hazards.

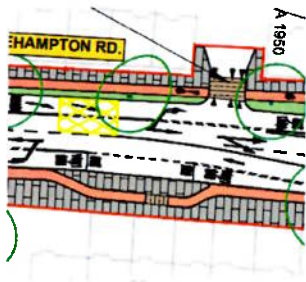
Sheet 4: Proposed new planting trees (Wellington PI junction) shall be of large canopy species to compensate for tree loss on Lesson Street Upper on the same sheet.



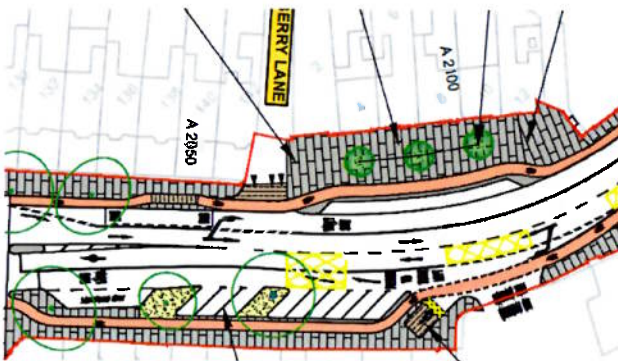
Sheet 5: The proposed removal of two younger trees on Morehampton Road requires justification. They are positioned away from the existing kerb-line as shown below. The drawings indicate other similar positioned larger trees retained?



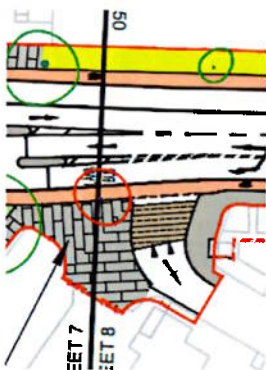
Sheet 6: Please clarify if compensatory tree planting can occur in this area to compensate for nearby proposed mature tree removals:



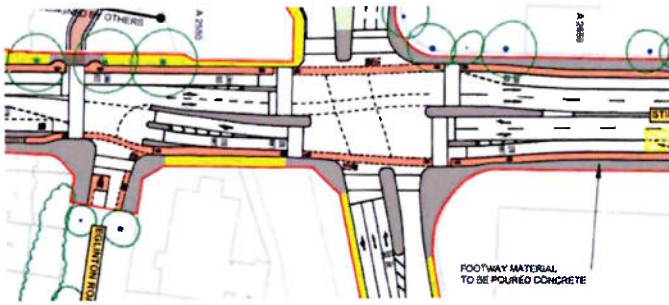
Sheet 7: Public realm enhancement measures are supported at Donnybrook Rd. Details will require further submissions including tree planting details to DCC Park Services. Surfacing should deploy granite stone at this location.



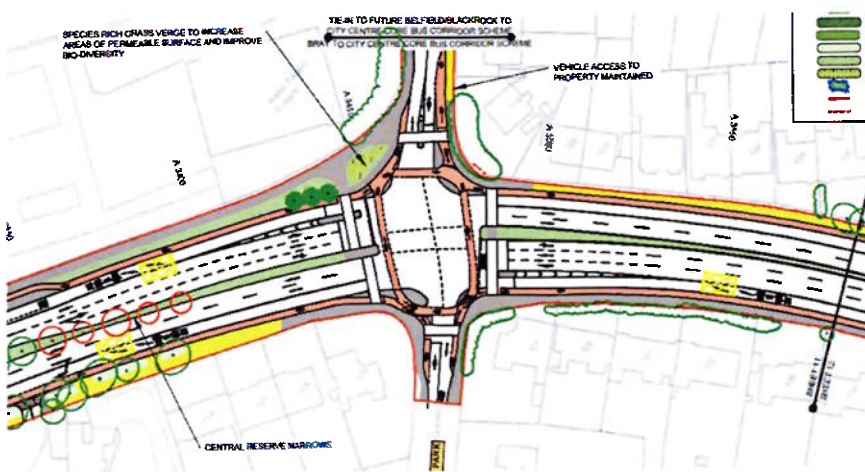
Sheet 7/8: The potential to plant a replacement tree at the street entrance to St Margarets/Brookvale Rd should be reviewed to compensate for the proposed existing tree removal.



Sheet 8: Please review the potential to green median strips at the Anglesea Bridge junction below.



Sheet 11: Please review road verges/median strips for locations for compensatory tree planting due to proposed tree removals in this general area:



Sheet 12: Please review road median strips in this area for locations for compensatory tree planting due to proposed tree removals.



In the event that An Bord Pleanála is satisfied that the proposed development should be approved, the Planning Authority requests that the scheme be approved subject to conditions to ensure that the development is carried out in accordance with the proper planning and sustainable development of the area and suggested conditions are included in Appendix 1 attached to this report.

2.5 Conclusion

The proposed Bray 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.

With regard to compliance with European, national and local policies and requirements, it is considered that An Bord Pleanála is the competent planning authority, however, Dublin City Council is satisfied that the application generally is consistent with, and supported by, the statutory Dublin City Development 2022-2028.

However, there are a number of areas within the Proposed Scheme which, in the opinion of the Planning Authority, require greater detail and in some instances reconsideration. In the event that An Bord Pleanála is satisfied that the proposed development should be approved, the Planning Authority requests that the scheme be approved subject to conditions to ensure that the development is carried out in accordance with the proper planning and sustainable development of the area and suggested conditions are included in Appendix 1 attached to this report.

APPENDIX 1

Recommendations/Conditions

Agreed conditions - Between Dublin City Council (DCC) and the National Transport Authority (NTA)

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 handback process, the treatment of all relevant records treated and how the corridor is to be accepted back by DCC following construction.
2. Following handback, 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.
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 incorporate the requirements of the DCC departments into the final detailed design of the Scheme.

Department Recommendations/ Conditions

Recommendations/Conditions – Traffic Division

1. All the traffic management equipment that is necessary for the safe and efficient operation of this Public Transport corridor, including all traffic signal equipment, shall be to the relevant DCC specification and only the relevant DCC maintenance contractor shall be permitted to undertake electrical or system control work on either the existing or new traffic signals.

Roads Division Standard Conditions

Handover:

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

Existing Condition Record:

2. A photographic record of all areas in Dublin City Council's control to be affected by the Bus connects scheme works shall be provided to Dublin City Council (DCC) prior to the commencement of any work.

3. Drawings distinguishing between antique granite footways and kerbs and new granite footways and kerbs shall be submitted as part of detailed design development of approved scheme.
4. Drawings clearly demarcating private landings shall be submitted as part of detailed design development of approved scheme.

Design:

5. Final details (including materials, finishes, sizes, gradients, levels and drainage) of all junctions, carriageways, islands, buildouts and footways as well as all signal/traffic light infrastructure shall be agreed with DCC prior to construction.
6. All Construction works shall comply with the "Construction Standards for Roads and Street Works in Dublin City Council".
7. Road Safety Audits shall be carried out for each public road that is to be modified as part of the Bus Connects scheme works at appropriate stages throughout the design of each individual scheme.
8. The alignment of the Bus Connects scheme shall be designed so as to ensure that all longitudinal gradients and crossfalls on carriageways, islands, buildouts and footways are in accordance with those specified in "Construction Standards for Road and Street Works in Dublin City Council" unless otherwise agreed with DCC.
9. Pedestrian priority shall be ensured throughout the Scheme design through signage and physical design measures where appropriate.
10. Buffer strips shall be provided at all locations where cycle lanes run between parking and loading areas and the kerb/footpath to ensure pedestrians including those with disabilities can safely alight from vehicles.
11. The Scheme shall ensure that principles of universal design are adhered to and accessibility requirements are met throughout the Scheme.
12. Modifications to existing in-curtilage car parking of properties impacted by the works shall ensure a footprint of 5 metres by 3 metres for car parking is retained in order to avoid parked cars overhanging the public footpath. Driveway entrances should be maximum 3m width in accordance with the standards set out in Dublin City Development Plan 2022-2028.
13. Alterations to kerbside spaces such as pay and display scheme/loading/line markings/signage pole shall be agreed with the Planning Authority to ensure adequate loading and set down is provided.
14. All signage and road markings to comply with the *Traffic Signs Manual*.

Reinstatement:

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

Construction Period:

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

Miscellaneous

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

Recommendations/Conditions - Public Lighting

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

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

1. It must be noted that special consideration must be given to any scheme where the Public Lighting is mounted on ESB Networks Infrastructure.
2. Public Lighting works may only be carried out on street lights mounted on ESB Networks in accordance with 'ESB Requirements for Work on Public Lighting on ESB's Networks' and by Public Lighting Contractors who have the required training and approvals for such work. These requirements impose stringent requirements on Local Authorities and Contractors.
3. All heritage public lighting must be safeguarded and protected and any requirements to move heritage columns must be agreed with the Public Lighting department..
4. Temporary Lighting: If the route where works are being carried out remains open for public use, e.g. to facilitate the continued movement of vehicles and pedestrians, then the route must be lighted at all times during night time hours.

Recommendations/Conditions – Environmental Protection Division

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

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

of these shall be agreed in writing with DCC Drainage Planning, Policy and Development Control prior to commencement of construction. Soft landscaping should be considered before hard landscaping. The SuDS design should refer to the new Dublin City Council Sustainable Drainage Design and Evaluation Guide published in 2021.

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

Recommendations/Conditions – Air and Noise Pollution Control Unit

1. Noise Control and Air Quality Control - Demolition and Construction Phase

It is recommended that the works must be carried out having regard to a Construction Management Plan submitted with the application. The plan must be written having regard to this Unit's Good Practice Guide for Construction and Demolition (below link). The plan must be approved by the Planning Department before work commences.

<https://www.dublincity.ie/residential/environment/air-quality-monitoring-and-noise-control-unit/good-practice-guide-construction-and-demolition>

Archaeology

1. NTA 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 Project Archaeologist will manage archaeological aspects of the project and input on, inter alia:
 - project planning and design,
 - scheduling of archaeological mitigation,
 - the development of programmes,
 - the development of construction and procurement strategies,
 - the preparation of contract documentation,
 - the appointment of competent consultant archaeologists,
 - advance works, construction and potential operational issues.
2. The Project Archaeologist shall ensure that the process of identifying the potential impact the project on archaeology is dealt with by a competent archaeologist.
3. The Project Archaeologist shall oversee the archaeological operations carried out by the contractor's archaeological consultant.
4. The Project Archaeologist shall ensure that appropriate investigation is carried out, where reasonably practicable, prior to the commencement of construction to identify both the known and unknown archaeology that may be impacted by the project. Where this is not reasonably practicable, an appropriate archaeological strategy to mitigate the known or potential archaeological impacts to be developed in consultation with the Minister.
5. The Project Archaeologist shall consider whether the archaeology can be preserved in situ within the confines of the project. Where preservation in situ cannot reasonably be achieved, allow sufficient time to preserve by record all archaeological remains that are impacted by the project to a level that is acceptable to the Minister.
6. The NTA shall provide the necessary funding to fulfil the post-excavation and reporting requirement(s) of the project to a standard that is acceptable to the Minister.
7. The Project Archaeologist shall ensure the publication and/or dissemination, as appropriate, the archaeological results of the project.
8. The Project Archaeologist shall copy Dublin City Council Archaeology Section with all Section 26 method statements and any reports arising and provide regular updates on finds and mitigation throughout the delivery of the scheme through to completion.
9. The primary archaeological paper archive for all archaeological site investigations to be prepared and deposited with the Dublin City Archaeological Archives within a timeframe to be agreed with the planning authority unless otherwise agreed with the Minister.

Conservation

Recommendations/Conditions

1. To safeguard the special architectural interest of affected Architectural Heritage across the Bus Connects routes - including Protected Structures and Conservation Areas, landscaping, historic paving, setts, kerbing and associated features, boundary treatments, historic street furniture, lamp posts, 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.
2. The conservation professional shall ensure adequate protection of the retained and historic fabric during the proposed works and across all preparatory and construction phases. In this regard, all works shall be designed to cause minimum interference to historic fabric.
3. In accordance with best conservation practice, specifications and method statements for the careful and sensitive relocation and reinstatement of historic fabric identified in the report above, and in particular to Protected Structures, sites/structures on the NIAH and DCIHR, and structures and features in Architectural Conservation Areas (ACAs) across the Bus Connects route shall be submitted by the conservation professional for the written approval of the Planning Authority in advance of works commencing.
4. The conservation professional shall advise the Conservation Section on architectural heritage and conservation matters that may have further impacts on the project throughout the construction phases.
5. If, through the course of construction work across the Bus Connects routes, hitherto unknown and concealed architectural heritage fabric is found, the conservation professional shall contact the Conservation Section to advise them of the discovery as the presence of historic fabric may inform an alternative strategy for a design proposal that would enhance the setting of a Protected Structure, other historic buildings and features, or Conservation Area.
6. All works shall be carried out in accordance with best conservation practice, the *Architectural Heritage Protection Guidelines for Planning Authorities (2011)* and the Advice Series issued by the Department of the Housing, Local Government and Heritage. All repair works shall retain the maximum amount of surviving historic fabric in situ. Items to be removed for repair off-site shall be recorded prior to removal, catalogued and numbered to allow for authentic re-instatement.
7. All existing original architectural heritage features, in the vicinity of the works shall be protected during the course of all phases of construction works.

8. All repair of historic fabric shall be scheduled and carried out by appropriately experienced conservators of historic fabric.
9. The Conservation Section recommends the following specific measures:
 - a) Full details of the design and type and location of each bus shelter / stop along the proposed route in front of Protected Structures and structures on the NIAH shall be submitted to and agreed in writing with the Planning Authority in advance of works commencing.
 - b) Proposed new bus shelter at 38/40 Morehampton Road (RPS 5318). The proposed shelters will have a direct impact on setting of the protected structure and potential indirect impact on boundary treatments.
The Conservation Section recommends omission of bus shelters in front of and in the immediate vicinity of Protected Structures across the route and for bus stops only to be considered at these locations, in order to minimise visual clutter and protect the special architectural character of Protected Structures. This shall be confirmed in writing to the Planning Authority in advance of works commencing.
 - c) Proposed new bus shelters at 92 Morehampton Road (CBC0013BTH141) and 117 Morehampton Road (CBC0013BTH134) will have a direct impact on setting of the structures and potential indirect impact on boundary treatments.
The Conservation Section recommends omission of bus shelters in front of and in the immediate vicinity of other structures of heritage interest across the route and for bus stops only to be considered at these locations, in order to minimise visual clutter and protect the special architectural character of the structures. This shall be confirmed in writing to the Planning Authority in advance of works commencing.
 - d) Consideration should 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.
 - e) The Conservation Section recommends the omission of cantilevered signal poles in the vicinity of Protected Structures, within Conservation Areas, red hatched conservation areas and residential conservation areas and alternative traffic signalling solutions should be sought particularly where these are proposed at the junction of St. Stephen's Green East and Leeson Street Lower; Leeson Street Upper and Grand Parade and the junction of Appian Way.
 - f) Where cycle ways are located in close proximity to Protected Structures and within Conservation Areas generally, the Conservation Section recommends the use of alternative high quality cycle lane surface in-lieu of red tarmacadam.
 - g) The alignment of footpaths should respect the setting of Protected Structures and buildings of National importance.

City Architects Recommended Conditions

1. Footpath widths & alignment: confirmation is requested that pedestrian traffic counts have been undertaken to ensure that the proposed footpath widths along the Proposed Scheme are sufficient to safely cater for anticipated pedestrian volumes. This confirmation should be submitted to the planning authority prior to commencement of development.

2. Local Public Realm Improvement Schemes: The information provided is insufficient to facilitate proper assessment of the proposals and additional information is required including visualisations of the proposals. Detailed drawings and specifications of the proposed public realm improvement schemes shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.
3. Land Acquisition by NTA & Taking in Charge:
 - (a) 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.
 - (b) Details of all landscaping and public realm finishes in areas where they are to be taken in charge shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.
4. Bus Shelter Design: Full details of the design and type of each bus shelter for each location shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.
5. Siting of utility cabinets and above-ground utility infrastructure: The siting of all utility cabinets and other above-ground utility infrastructure shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.
6. On-street Parking: The NTA should engage with electrical charging operators to co-ordinate the roll out of electrical charging points to on-street parking areas as part of the works along the route of the Proposed Scheme. This shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.
7. Palette of materials:
 - (a) the extent of existing hard landscape to be retained within the Proposed Scheme shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.
 - (b) the material palette within the Proposed Scheme shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.
8. Palette of street furniture: A full palette of street furniture and their proposed locations across all the proposed BusConnects Core Bus Corridor Schemes, shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.
9. Boundary treatments:
 - (a) The fabric in all property boundaries which are to be relocated to facilitate land acquisition along the Proposed Scheme should be assessed for their architectural conservation value and cultural value. This assessment should be submitted to, and agreed in writing with, the planning authority prior to commencement of development. The assessment should confirm whether the fabric, which may include railings, walls etc. is suitable for repair and re-use for sustainability reasons in the new boundaries rather than replaced with new.

- (b) The fabric in all property boundaries which are to be relocated to facilitate land acquisition along the Proposed Scheme should be assessed whether it may be suitable for repair and re-use for sustainability reasons in the new boundaries rather than replaced with new. This assessment should be submitted to, and agreed in writing with, the planning authority prior to commencement of development.
10. Per cent for Art Strategy: The selection and location of artworks along the route as part of the Percent for Art strategy shall be reviewed and agreed with the local authority Arts Office and submitted to, and agreed in writing with, the planning authority prior to commencement of development.
 11. Concrete & Painted Medians: All proposed medians should be reviewed to ascertain if they could provide additional greenery or alternatively if the median space could be removed and reallocated into the footpaths adjacent. This shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.
 12. Traffic Signal & Signage Poles: The number of poles required for traffic signal and signage needs to be designed to the minimum. This information shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.
 13. Gantry Signage – Traffic Signals: Gantry traffic signage should not be included in the scheme due to their high visual impact and alternative traffic signage solutions should be investigated. Photomontages to be re-submitted showing any proposed gantry traffic signals. This information shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.
 14. Water Drinking Fountains: Suitable locations for water drinking fountains should be identified and installed as part of the works along the route of the Proposed Scheme. This shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.
 15. Village Signage: Village signage should be incorporated into the Proposed Scheme, and a scheme of city wide co-ordinated village signage should be undertaken and shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Parks Division Recommended Conditions

1. Tree Bond: Prior to commencement of development, the applicant shall lodge with the planning authority a cash deposit , a bond of an insurance company or such other security as may be accepted by the planning authority to secure the protection of existing trees to be retained on or adjacent the site and to make good any damage caused by construction, coupled with an agreement empowering the planning authority to apply such security , or part thereof, to the satisfactory protection of any trees adjacent or on the site or the replacement of any such trees which die, are removed or become seriously damaged or diseased within a period of three years from the substantial completion of the development with others of similar size and species, or to apply to new tree planting in the local area. The amount of the security shall be determined by the Helliwell or Cavat method by the developer's arboriculturist. The form and amount of the security shall be as agreed between the

planning authority and the developer or, in default of an agreement, shall be referred to An Bord Pleanála for determination.

Reason: To secure the retention of existing trees to be retained on the site.

2. Landscape scheme to be implemented: The applicant will retain the professional services of a qualified Landscape Architect as a Landscape Consultant throughout the life of the development works. The landscape scheme accompanying the application as amended with comments given by the planning authority shall be implemented fully in the first planting season following completion of the development or completion of any phase of the development, and any vegetation which dies or is removed within 3 years of planting shall be replaced in the first planting season thereafter. The implemented landscape scheme will be maintained for 3 years post completion by the applicant. The applicant's landscape architect will submit a Landscape Completion Report to the planning authority for written agreement, as verification that the approved landscape plans and specification have been fully implemented.

The landscape scheme shall have regard to the Guidelines for Open Space Development and Taking in Charge, copies of which are available from the Parks and Landscape Services Division.

Reason: in the interests of amenity, ecology and sustainable development

3. Tree Protection: Prior to the commencement of development, the developer will retain the professional services of a qualified Arboriculturist throughout the life of the site development works. The Arboriculturist will advise and supervise all works associated or in proximity to the existing trees to ensure their retention and condition. All trees shown to be retained on the site and adjacent to the site, shall be adequately protected during the period of construction as per BS 5837, such measures to include a protection fence beyond the branch spread, with no construction work or storage carried out within the protective barrier. The arboriculturist will prepare a tree survey on completion of the works and submit to the planning authority. All outstanding remedial tree works will be completed by the applicant as directed by the planning authority. (The tree protection measures shall have regard to the Guidelines for Open Space Development and Taking in Charge, copies of which are available from the Parks and Landscape Services Division).

Reason: in the interests of amenity, ecology and sustainable development.

4. Bat & Bird Conservation

(a) All trees proposed to be felled shall be checked pre-construction for the presence of bats and a derogation licence shall be sought from the NPWS should evidence of bat activity be found. No works are to take place prior to the granting of such licences.

(b) All tree/shrub removal works shall take place outside of the bird nesting season (March 1st to August 31st.)

Reason: in the interests of protection of biodiversity.

Brianán Nolan

Senior Executive Planner

5/10/23