



Liffey Valley to City Centre Core Bus Corridor Scheme

NTA Observations on
the Dublin City Council
Submission

March 2023

**BUS
CONNECTS**

SUSTAINABLE TRANSPORT FOR A BETTER CITY.

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1 Introduction

This report provides a response to the submissions made by Dublin City Council (DCC) made to An Bord Pleanála (“the Board”) in response to the following:

- *The application under Section 51 of the Roads Act 1993, as amended, for approval of the Liffey Valley to City Centre Core Bus Corridor Scheme (“the Proposed Scheme”); and*

DCC were requested by the Board to make observations to the proposed development by 27th February 2023. This document forms the National Transport Authority (NTA)’s response to the DCC submission.

2 Response to DCC Submission on Proposed Scheme

Dublin City Council’s (DCC) submission comprised of 66 pages and is sectionalised numerically. For ease of reference the DCC section numbering, and sub-section numbering conventions have been retained throughout the NTA’s response as set out in the following paragraphs.

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

- Role of NTA & Liaison with DCC
- Support for the Scheme
- Certain Observations Raised/Clarification Sought by DCC
- Response to Section 2.1 Relevant Planning History
- Response to Section 2.2 Policy Context
- Response to Section 2.3 Departmental Reports, including reference to the Appendix
- Response to Section 2.4 Planning Assessment (sub-sections 2.4.1 to 2.4.11)
- Response to Section 2.5 Conclusion
- Response to Appendix to DCC Submission

2.1 Role of the National Transport Authority (NTA) and Liaison with Dublin City Council (DCC)

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

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

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

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

- a. to secure the provision of, or to provide, public transport infrastructure;*

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

The Board of the NTA, at its meeting on 18 October 2019, considered whether the function of providing the public transport infrastructure comprising of the CBC Infrastructure Works should be performed by the NTA itself under the provisions of Section 44(2)(b) of the 2008 Act. Following consideration, the Board of the NTA decided that the functions in relation to securing the provision of public transport infrastructure falling within Section 44(2)(a) of the 2008 Act (as amended) in relation to the CBC Infrastructure Works, should be performed by the NTA.

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

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

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

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

2.2 Support for the Scheme

In its submission, DCC confirmed its support for the Proposed Scheme, and stated in their conclusion on page 54 of the submission:

“The proposed Liffey Valley 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 2016-2022 as well as the draft Dublin City Development Plan 2022-2028.”

DCC further confirmed (at page 50 of its submission) that the development of the Proposed Scheme will provide an upgraded and expanded bus network and quality of service together with better quality cycling and pedestrian facilities and DCC acknowledged that these improvements will make it easier for people to access and use public transport. It also acknowledged that the Proposed Scheme will, in turn, promote modal shift from the private car to more sustainable forms of transport including walking, cycling and public transport, ultimately contributing to the creation of a greener and more sustainable city.

On page 7 DCC states that the regional level policy supports the overall delivery of key sustainable transport projects, including BusConnects, this support is welcomed as BusConnects aims to follow the Strategy.

In relation to the EIAR, DCC states on Page 17 that:

“A comprehensive EIAR is provided with the application examining the project under all relevant impacts and finds generally that the development would not adversely impact on existing environmental amenities”

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

On page 17 and 18, in relation to the Natura Impact Statement (NIS), DCC comments that the NIS *“is generally satisfactory in terms of identifying the relevant Natura 2000 sites and the potential adverse impacts on the integrity of designated Natura 2000 sites along the Dublin coastline in view of their conservation objectives.”*. Further stating in the submission *“the avoidance, design requirements and mitigation measures set out in the NIS will ensure that any impacts on the conservation objectives of European Sites will be avoided during the construction and operation of the proposed scheme such there will be no adverse effects on any European sites.”*.

In relation to zoning (beginning on page 18), DCC states that the proposed scheme is overall considered to be compatible and consistent for zoning objectives for the area, including zones Z1, Z2, Z3, Z4, Z5, Z6, Z9, and Z15.

In relation to amenities (Page 19), DCC states that it is *“satisfied that the elements of the proposed development which fall within the Council boundary would not have any excessive or undue impact on the amenities of the area”*, further stating that *“Once complete the proposed scheme will create attractive, functional and accessible places for people alongside the core bus and cycle facilities which will enhance the amenities of the area.”*.

In relation to strategic observations, DCC states on page 20 that *“The City Council supports the importance of public transport and cycling which will allow for higher density development, thereby creating a more sustainable interaction between land-use and transport.*

The Environment and Transport Department goes on to state on page 20 that it is generally supportive of the improvements to bus and cycling infrastructure proposed in the overall context of encouraging a shift to sustainable mobility. On page 21, the Traffic Division shows its support for integrated sustainable transport proposals, with the Roads Division specifically stating on page 22 that BusConnects proposes substantial improvement to bus and cycling infrastructure.

In relation to the EIAR, the Archaeology comments state on page 36 that the report *“concurrs with finding of the archaeological assessment in the EIAR and supports the mitigation measure proposed in it.”*.

The general response of the Conservation comments on page 40 states that *“The comprehensive assessment on architectural heritage, streetscape and the urban environment submitted as part of the EIAR and the proposed mitigation measures across the scheme is generally welcomed”*.

On page 51 of the DCC submission, the City Architects Department welcomed in principle the objectives of the Proposed Scheme to support integrated sustainable transport use through infrastructure improvements for active travel (both walking and cycling), and the provision of enhanced bus priority measures. It goes on to state that 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.

2.3 Certain Observations Raised/Clarification Sought by DCC

2.3.1 Relevant Planning History (Section 2.1)

DCC, in this section 2.1 of its submission, listed five significant planning applications along, and adjacent to, the Proposed Scheme. The NTA notes that two of the planning applications listed are identified in the application documentation – namely EIAR Volume 4 Appendices (Appendix A21.1 Records of Stage 1 and 2 of Cumulative Effects Assessment, Table 1)

- SHD0011/22 (ABP planning reference 307087 / 313320)- 927 apartments and duplex/triplex units on the former De La Salle National School site on Ballyfermot Road, Ballyfermot, Dublin 100 is still currently under deliberation.
- SHD0029/20 (ABP planning reference 308871)- Permission has been granted for construction on the former Steel Works Site to begin, it will create 189 Build-to-Rent apartments.

The other planning applications that DCC refer to are:

- 3209/19 – Permission has been granted for a mixed use development in five blocks over basement at Grand Canal Harbour, Grand Canal Place, Dublin 8. The 550 residential units shall be part of the 'Build to Rent' Scheme. This is also referenced within EIAR Volume 4 Appendices (Appendix A2 .1 Planning Report).
- St Michael's Estate (ABP planning reference 314791)- A DCC project which is currently under deliberation for major regeneration of the St Michaels estate. This is referred to in EIAR Volume 2 Chapter 4 Proposed Scheme Description Section 4.6.6.3 and also PDR Section 3.2.6, both state the Proposed Scheme will interface with the regeneration.
- 4588/22- The Guinness Quarter development is a current planning application, for mixed use which resides on the current Guinness Brewery Lands to the South of James Street and Thomas Street, Dublin 8.

The NTA confirms its awareness of these three planning applications. A further review has been undertaken on a precautionary basis to identify other relevant strategic housing developments/significant infrastructure developments that may have been planned during and since the preparation of the EIAR. No significant residual cumulative impacts are considered likely from any schemes identified, in cumulation with the Liffey Valley to City Centre scheme.

Should the developments receive planning approval and begin construction prior to the Proposed Scheme, the NTA will work with the local authority to ensure both schemes are compatible. However, the proposed scheme will benefit those developments in terms of providing enhanced overall public transport, cycling and walking connectivity.

It is also acknowledged in Section 5.9 of Chapter 5 of Volume 2 of the EIAR that interface liaison will be undertaken on a case-by-case basis with other projects if required to ensure that cumulative impacts are managed appropriately:

Interface liaison will take place on a case-by-case basis through the NTA, as will be set out in the Construction Contract, to ensure that there is coordination between projects, that construction access locations remain unobstructed by the Proposed Scheme works and that any additional construction traffic mitigation measures required to deal with cumulative impacts are managed appropriately.

2.3.2 Policy Context (Section 2.2)

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

Some additional observations by DCC over and above those already provided within Table 3.8 of the Planning Report in relation to the Dublin City Development Plan 2016-2022 are welcomed, including that the Proposed Scheme is consistent with Policy MT2 of the Development Plan, which sets out the necessity to continue to promote modal shift from private car use towards more sustainable forms of transport such as cycling, walking and public transport, which directly aligns with the Proposed Scheme objectives.

Similarly, it is acknowledged that Policy MT7 and MT23 of the Development Plan have a direct correlation with the Proposed Scheme's objectives given the various improvements to thoroughfares and junctions, the implementation of parts of the Greater Dublin Area cycle network and improved pedestrian facilities which will provide for the needs of people with mobility impairment and/or disabilities including the elderly and parents with children.

The DCC submission notes the **Strategic Development and Regenerations** (Section 2.2.2.1.1) that the Core Bus Corridor passes within or alongside. The NTA notes that the Proposed Scheme aligns with the objectives for the SDRA 9 (Emmet Road), SDRA 15 (Mount Brown), Liberties LAP 2009 and Cherry Orchard LAP 2019 as set out with EIAR Volume 4 Appendices Part 1 of 2, A2.1 Planning Report for the Proposed Scheme.

The Parkwest Cherry Orchard Local Area Plan is the main focus of the **Area Specific Plans** (Section 2.2.2.1.2). Dublin City Council states that the LAP identifies a Strategic Vehicular Route at the junction

with Ballyfermot Road and that the junction should be safeguarded into the future. In addition to this route, the junction is also part of a Green Infrastructure Network and therefore DCC suggests further examination for increased greening proposals.

The strategic importance of the junction has been considered within the design of the Proposed Scheme and access is not precluded. The junction will be upgraded as part of the Proposed Scheme with enhanced bus priority, walking and cycling facilities. As set out in EIAR Volume 2 Main Chapters, Chapter 4 Proposed Scheme Description, the landscape and urban realm proposals are derived from analysis of the existing urban realm which allowed the designers to consider appropriate enhancement opportunities along the route. The enhancement opportunities include key nodal locations which focus on locally upgrading the quality of the paving materials, extending planting, decluttering of streetscape and general placemaking along the route. Along the route there will be a number of enhancements to specific urban realm hot spots where there is a clear opportunity to improve existing key public spaces. As stated in the PDR, new street trees are proposed where footways are wide enough and below-ground services allow.

DCC noted that the **Draft Dublin City Development Plan 2022-2028** (Section 2.2.2.2) was scheduled to be adopted in December 2022, and that a significant number of policies have relevance to the delivery of transport infrastructure.

The NTA notes that the Draft Dublin City Development Plan 2022-2028 was adopted on the 2nd November 2022 and came into effect on the 14th December 2022. The EIAR had regard to the draft plan prior to its adoption, noting the following from EIAR Volume 2 Main Chapters, Chapter 2 Need for the Proposed Scheme, Section 2.3.5.9:

The Dublin City Development Plan 2022-2028 is set to be adopted in 2022. Although the draft Dublin City Development Plan 2022-2028 is subject to change, it is clear that BusConnects is an important consideration, and its development is to be considered as part of the shaping of emerging policy for the city.

In addition to the above, the Draft Dublin City Plan Development Plan 2022 – 2028 was considered within EIAR Volume 4 Appendices Part 1 of 2, Appendix A2.1 Planning Report. The Planning Report sets out the status of the Plan at the time of writing and outlines some of its key objectives from Chapter 8 (Sustainable Movement and Transport) including the following key excerpts:

- *'Sustainable and efficient movement of people and goods is crucial for the success and vitality of the city.'*
- *'The policy approach promotes the integration of land use and transportation, improved public transport and active travel infrastructure, an increased shift towards sustainable modes of travel and an increased focus on public realm and healthy placemaking, while tackling congestion and reducing transport related CO2 emissions'; and*
- *It also commented under the heading 'Sustainable Modes' that 'Key strategic transport projects such as the proposed Metrolink, DART+, BusConnects programme and further LUAS Line and rail construction and extension will continue the expansion of an integrated public transport system for the Dublin region and have the potential for a transformative impact on travel modes over the coming years. Dublin City Council actively supports all measures being implemented or proposed by other transport agencies to enhance capacity on existing lines/services and provide new infrastructure.'*

The Proposed Scheme was considered and helped to influence the shaping of emerging DCC policy.

Further to the above, it is noted that the adopted Dublin City Development Plan 2022 – 2028 is supportive of BusConnects. The adopted Plan includes the Proposed Scheme at Figure 8-3 'BusConnects' in which it outlines each of the BusConnects 'Radial Core Bus Corridors'. It also refers to BusConnects as a *'Key strategic transport project'* that forms part of the *'expansion of an integrated public transport system for the Dublin region.'* It goes on to say *'Dublin City Council actively supports all measures being implemented or proposed by other transport agencies to enhance capacity on existing lines/services and provide new infrastructure.'*

In the context of the above, it is clear that both the draft and adopted Dublin City Development Plans support the Proposed Scheme.

DCC details under the heading 'Draft Area Specific Plans' the non statutory- **Kilmainham Inchicore Development Strategy (KIDS)**. DCC provides an overview of projects within the KIDS, as follows:

- Enhancement of Kilmainham Village

DCC recommends that increased footpath widths are considered on the landing point of the potential Camac Greenway on South Circular Road.

Camac Greenway is outlined within the GDA Cycle Network Plan. Section 2.2.1.3 of Chapter 2 of the EIAR summarises the GDA Cycle Network Plan and the context of the Proposed Scheme within it. The EIAR states that the GDA Cycle Network Plan (NTA 2013), was adopted by the NTA in early 2014 following a period of consultation with the public and various stakeholders. This plan forms the strategy for the implementation of a high quality, integrated cycle network as set out in the GDA Transport Strategy.

The Proposed Scheme, which is supported by the GDACNP for the area, is needed to address the significant deficiency in the very limited segregated cycling infrastructure currently available on this corridor.

As set out in Chapter 4 of the EIAR (Proposed Scheme Description) where the schemes have been implemented and fall within the scheme boundary, tie ins have been provided:

A tie-in is provided to a Secondary Route within the GDA Cycle Network Plan at the Cloverhill Road / Coldcut Road junction (Route 8C1). At the junction between Coldcut Road / Ballyfermot Road / Kennelsfort Road Upper, cycle tracks on each side of the road are proposed onto Kennelsfort Road Upper, aligning with a Feeder Route identified in the GDA Cycle Network Plan. Similarly cycle track tie-ins are proposed on to Drumfinn Road and on to Le Fanu Road from Ballyfermot Road, aligning with two other Feeder Routes identified in the GDA Cycle Network Plan.

Tie-ins are provided to two Secondary Routes within the GDA Cycle Network Plan, namely at the Ballyfermot Road / Kylemore Road junction (Route SO4), and at the Sarsfield Road / Con Colbert Road junction (Route 6A). There are no tie-ins to any Feeder Routes on the GDA Cycle Network Plan along this section of the Proposed Scheme.

The short section of segregated cycle track on Memorial Road is part of the NO6 Greenway Route. There is a tie-in with another GDA Cycle Network Plan Primary Route (SO1) at the junction with South Circular Road. There are a number of Secondary Routes which interface with this section of the Proposed Scheme (SO2, C3 SE to West, and Long Lane) with tie-ins shown where possible.

- Enhancement of Inchicore Village

DCC notes that there is opportunity for public realm improvements as a result of the reduction in vehicles through the village due to the Proposed Scheme.

The NTA notes this comment. The aim of the Proposed Scheme is to provide enhanced walking, cycling and bus infrastructure on this key access corridor in the Dublin region, which will enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor.

It is an objective of the Proposed Scheme to ensure that the public realm along the Proposed Scheme is carefully considered in the design and development of the transport infrastructure and seek to enhance key urban focal points where appropriate and feasible.

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

Mature trees are to be retained along Grattan Crescent. High quality urban realm is proposed in front of the school with an improved pedestrian crossing between the school and the park. Granite paving with granite kerbs are proposed at this location.

A new meeting place is proposed outside the school with existing tree surrounds incorporating timber seating to reflect the timber cladding material of the school. Parallel parking bays along the park edge will be finished with granite setts. All existing trees are to be retained and protected with enhanced tree pits. Paving at the park gate is to be enhanced with granite setts. New tree planting is proposed near the park entrance gate.

Village Centre footways are proposed to be enhanced and unified in terms of materials and details with high quality concrete paving and wide granite kerbs. More space given to pedestrians and a general de-clutter of street furniture is proposed.

Between Emmet Road Village Centre and South Circular Road:

New street trees are proposed where footways are wide enough and below ground services allow. A small urban realm improvement opposite Inchicore College will feature a new street tree and shrub planting adjacent to a re-organised row of asphalt parking bays with concrete setts to the rear.

- Military Quarter

DCC highlights the aims to improve walking and cycling connectivity between major heritage assets in the Kilmainham Inchicore wider area. It states that Old Kilmainham Road/ Emmet Road will be a key route and has requested for a further examination of whether cycling and walking provisions can be improved.

The NTA acknowledges that the Proposed Scheme is to be delivered in constrained urban environments, and therefore the delivery of a segregated cycle track / widened pedestrian facilities may not always be practicable.

In terms of walking provision, in order to facilitate the Proposed Scheme, it will be necessary to reduce footpath widths along Emmet Road in some locations. This is required to facilitate dedicated bus priority and, in some cases, to provide allocated residential parking that has been relocated or reduced. It is noted that the footpath where the additional parking spaces are proposed will not be reduced to less than the desirable minimum width of 2m.

In delivering a feasible scheme which achieves this stated aim, the NTA has had to balance a number of often-competing factors. Specifically at this location it has been required to balance the need to provide parking and loading within the constrained location with the objectives of the Proposed Scheme to provide high quality public transport, cycling and walking facilities through this area.

The Level of Service (LoS) assessment presented in Chapter 6 Traffic and Transport of Volume 2 of the EIAR highlights the improvements in this area as a result of the Proposed Scheme with the Level of Service for pedestrians increasing at Grattan Crescent / Emmet Road / Tyrconnell Road junction, Emmet Road / Spa Road junction, Emmet Road / St Vincent's Street West junction, Emmet Road / Myra Close junction, Emmet Road / Turvey Avenue / Luby Road junction and at the two pelican crossings. At minor junctions along this section, raised tables are proposed across side streets to provide pedestrian priority. This will improve pedestrian accessibility and include the provision of adequate tactile paving, dropped kerbs and road markings in accordance with current guidance on these arms.

In terms of cycling provision, the majority of Emmet Road is not included within the Primary or Secondary Cycle Network (as highlighted in Figure 2.1 below). Emmet Road intersects with the following Cycle Routes:

- 7A and SO1 at the Emmet Road / South Circular Junction; and
- NO1 at the Emmet Road / Bulfin Road Junction.



Figure 2.1 Extract from GDA Cycle Network Plan Maps

Section 3 of the Preliminary Design Report provided in the Supplementary Information notes the junction of Grattan Crescent / Sarsfield Road / Inchicore Road will be upgraded as part of the Proposed Scheme to provide better walking and cycling facilities. The improved cycle facilities at this junction also facilitates the primary cycle route 7A which travels along Sarsfield Road and Inchicore Road and provides an alternative cycle route to the city centre before re-joining the corridor at Bow Lane.

As set out in the Chapter 6 Traffic and Transport of Volume 2 of the EIAR, ‘*although no bespoke cycle provision is offered... local bus gates will reduce through traffic creating an environment more conducive to cycling*’.

The removal of a general traffic lane along Emmet Road was considered as part of the Liffey Valley to Christchurch Core Bus Corridor Options Study which is contained in Appendix F of the Preferred Route Option Report but was ruled out. The removal of a general traffic lane would also not have provided sufficient space required to implement protected cycle tracks in both directions along Emmet Road.

The Road Safety Audits undertaken for the Proposed Scheme, included as Appendix M of the Preliminary Design Report provided in the Supplementary Information, do not highlight any safety issues with the proposed arrangement in this regard.

DCC comments on the **Draft Strategic Development and Regeneration Areas (SDRAs)**. Comments include:

- SDRA 7 (Heuston and Environs) DCC requests that greening, cycling and pedestrian connections could be provided along Old Kilmainham Road / Mount Brown / James’s Street.

As set out in Chapter 4 (Proposed Scheme Description) of Volume 2 of the EIAR, the landscape and urban realm proposals are derived from analysis of the existing urban realm which allowed the designers to consider appropriate enhancement opportunities along the route. The enhancement opportunities include key nodal locations which focus on locally upgrading the quality of the paving materials, extending planting, decluttering of streetscape and general placemaking along the route. Along the route there will be a number of enhancements to specific urban realm hot spots where there is a clear opportunity to improve existing key public spaces. These include for example, Ballyfermot Retail Centre, the Ballyfermot roundabout, Grattan Crescent, the James St/ Bow Lane West junction (Obelisk Fountain) and Cornmarket junction. The proposals at these locations vary in scale, material

specification and function but are considered to be positive additions to the BusConnects Scheme.

Along the Proposed Scheme, as outlined in the planting strategy in the Preliminary Design Report, a substantial tree planting plan will result in a net increase of 354 additional semi-mature trees and 504m² of woodland area along the Proposed Scheme.

As noted in Chapter 4 (Proposed Scheme Description) of Volume 2 of the EIAR, Mount Brown and Old Kilmainham are constrained due to the narrow nature of the existing road and the fact that buildings front onto the road on both sides which limit the options to provide bus priority. As a result, a Bus Gate has been proposed in order to provide bus priority along this section of the Proposed Scheme.

As such, and as set out in Chapter 6 (Traffic and Transport) of Volume 2 of the EIAR, although no bespoke cycle provision is offered in these sections, local bus gates at Mount Brown will reduce through traffic creating an environment more conducive to cycling. Additionally, as part of the Proposed Scheme, a Quiet Street with restricted vehicle flow is proposed along Newington Lane / Basin View / St. James's Avenue / Grand Canal Place / Echlin Street which offers an alternative route for cyclist to James's Street.

Chapter 6 (Traffic and Transport) of Volume 2 of the EIAR displays the significance of effect for pedestrians with the Proposed Scheme. Table 6.31 in Chapter 6 (reproduced in Figure 2.2 below) displays the change in Level of Service (LoS) along Section 3 of the Proposed Scheme. Overall, it is anticipated that there will be Positive, Significant and Long-term effect to the quality of the pedestrian infrastructure along Section 3 of the Proposed Scheme, during the Operational Phase, which aligns with the overarching aim to provide enhanced walking infrastructure on the corridor.

Table 6.31: Section 3 - Significance of Effects for Pedestrian Impact during Operational Phase

Junctions	Chainage	Do Minimum LoS	Do Something LoS	Magnitude and type of impact	Sensitivity	Significance of Impact
Memorial Road / Con Colbert Road	B5080-B5110	E	B	Medium	Medium	Positive Significant
Memorial Road / Inchicore Road	B5100 - B5200	E	A	High	Medium	Positive Very Significant
Mid-link crossing: Grattan Crescent	B5490	N/A	A	High	Medium	Positive Very Significant
Grattan Crescent / Grattan Crescent Park Entrance	B5500-B5510	C	B	Low	Medium	Positive Moderate
Inchicore Terrace South	B5550-B5560	D	C	Low	Low	Positive Slight
Grattan Crescent / Emmet Road / Tyrconnell Road	B 5600 - B5700	C	A	Medium	High	Positive Very Significant
Emmet Road / Spa Road	B5720-B5740	C	B	Low	Low	Positive Slight
Emmet Road / St Vincent's Street West	B5800 - B5850	D	B	Medium	Low	Positive Moderate
Mid-link crossing: Emmet Road	B6040	C	A	Medium	Low	Positive Moderate
Emmet Road / Myra Close	B6130 - B6200	D	B	Medium	Medium	Positive Significant
Mid-link crossing: Emmet Road	B6310	B	A	Low	Medium	Positive Moderate
Emmet Road / Turvey Avenue / Luby Road	B6300 - B6350	D	B	Medium	Medium	Positive Significant
Mount Brown / Unnamed Road	B7040-B7060	F	C	Medium	High	Positive Very Significant
Mount Brown / Unnamed Road	B7100 – B7120	D	B	Medium	High	Positive Very Significant
Mid-link crossing: James Street	B7400	N/A	A	High	High	Positive Profound
James's Street / Bow Lane West	B7700 - B7800	D	B	Medium	Low	Positive Moderate
James's Street / Echlin Street	B7900 - B7930	C	B	Low	Low	Positive Slight
James's Street / Guinness Pharmacy Site Entrance	B7930-B7940	E	B	Medium	Low	Positive Moderate
Bridgefoot Street / Thomas Street / Thomas Court	B8350 - B8400	E	C	Medium	Medium	Positive Significant
R810 Thomas Street / R108 High Street (Cornmarket) Junction	B8800 - B8900	E	A	High	High	Positive Profound
Section Summary		D	B	Medium	Medium	Positive Significant

Figure 2.2 : Section 3 - Significance of Effects for Pedestrian Impact during Operational Phase

- SDRA 9 (Emmet Road) DCC requests that greening, cycling and pedestrian connections could be provided along Emmet Road.

NTA's response to this has been set out above and in response to DCC's comments on the Military Quarter.

- SDRA 14 (St James Medical Campus & Environs) DCC notes that there no so significant public realm improvements proposed at St James's Street gateway.

As set out in Chapter 4 (Proposed Scheme Description) of Volume 2 of the EIAR, the landscape and urban realm proposals are derived from analysis of the existing urban realm which allowed the designers to consider appropriate enhancement opportunities along the route. The enhancement opportunities include key nodal locations which focus on locally upgrading the quality of the paving materials, extending planting, decluttering of streetscape and general placemaking along the route. Along the route there will be a number of enhancements to specific urban realm hot spots where there is a clear opportunity to improve existing key public spaces. These include for example, Ballyfermot Retail Centre, the Ballyfermot roundabout, Grattan Crescent, the James St/ Bow Lane West junction (Obelisk Fountain) and Cornmarket junction. The proposals at these locations vary in scale, material specification and function but are considered to be positive additions to the BusConnects Scheme.

EIAR Volume 2 Chapter 17, Landscape (Townscape) & Visual, documents the potential landscape (townscape) and visual impacts associated with the Construction and Operational Phases of the Proposed Scheme. The impacted trees are presented in the EIAR Volume 3

Chapter 4, Proposed Scheme Description 5. Landscaping General Arrangements and further described in Volume 4 Appendices Part 2 of 2, Appendix A17.1 Arboricultural Impact Assessment. At this location a partial tree removal is proposed whilst some trees are retained. To partially mitigate the trees loss at this location, additional trees are proposed.

Access to hospital campus via sustainable modes will be greatly improved following the implementation of the Proposed Scheme as well as the amendments to the bus network service routing, with expected bus journey time reductions, more dependable bus services and increases in the frequency of bus services across the network as a whole. This serves to achieve the aim of the Proposed Scheme which is to provide enhanced walking, cycling and bus infrastructure on this key access corridor in the Dublin region. This will enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor.

- SDRA 15 (Liberties and Newmarket Square) DCC requests that additional greening and improvements to cycling and pedestrian facilities around Thomas Street and the High Street are considered.

As set out in Chapter 4 (Proposed Scheme Description) of Volume 2 of the EIAR, the landscape and urban realm proposals are derived from analysis of the existing urban realm which allowed the designers to consider appropriate enhancement opportunities along the route. The enhancement opportunities include key nodal locations which focus on locally upgrading the quality of the paving materials, extending planting, decluttering of streetscape and general placemaking along the route. Along the route there will be a number of enhancements to specific urban realm hot spots where there is a clear opportunity to improve existing key public spaces. This includes at the James St/ Bow Lane West junction (Obelisk Fountain) and Cornmarket junction.

The various improvements to the public realm, walking and cycling facilities along Thomas Street, Cornmarket and High Street are noted in the Landscape General Arrangement drawings in Volume 3, Chapter 4 Section 5 of the EIAR.

DCC references the **Emmet Road Project** and notes that the principle of a quicker and more frequent bus service is welcomed. DCC suggest that the junction with St Vincent Street West is raised as per the design of other junctions along Emmet Road. As set out in Appendix A6.4.2 of the Transport Impact Assessment this design is anticipated to reduce vehicle speeds at this junction. A signalised pedestrian crossing is provided in this location. This design is anticipated to increase the LoS at this junction from a D rating to a B rating resulting in a Positive, Moderate and Long-term effect to the quality of the pedestrian infrastructure.

2.3.3 Departmental Reports (Section 2.3 & Appendix)

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

2.3.4 Planning Assessment (Section 2.4)

Planning Policy (Section 2.4.1)

Note this is responded to in Section 2.3.2 above.

Environmental Impact Assessment Report (EIAR) (Section 2.4.2)

In relation to the EIAR, DCC states (at page 17 of its submission) that "[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" and they go on to say, also on page 17, that "the content [of the EIAR] points generally to the development having negligible impact on the existing environment".

Natura 2000 (Section 2.4.3)

In relation to the NIS, DCC states (at page 18 of its submission) that the Natura Impact Statement submitted is generally satisfactory in terms of identifying the relevant European sites and the potential adverse impacts on the integrity of designated European sites along the Dublin coastline in view of their conservation objectives. DCC go on to state in its submission that *“[t]here is considered to be sufficient distance from the intended route of the bus corridor to SAC and SPA sites, and the avoidance, design requirements and mitigation measures set out in the NIS will ensure that any impacts on the conservation objectives of European Sites will be avoided during the construction and operation of the proposed scheme such there will be no adverse effects on any European Sites.”*

DCC also observes that the Natura Impact Statement objectively concludes that the development will not adversely affect (either directly or indirectly) the integrity of any European Site, either alone or in combination with other plans or projects and there is no reasonable scientific doubt in relation to this conclusion.

Zoning and other designations (Section 2.4.4)

In relation to zoning, the NTA notes that DCC sets out the view on page 19 of its submission that, overall, the Proposed Scheme is compatible and consistent with the zoning objectives for the area, being a public service installation.

Impact on amenity (Section 2.4.5)

On page 19 of its submission, in relation to amenities, DCC states:

“Dublin City Council is satisfied that the elements of the proposed development which fall within the Council boundary would not have any excessive or undue impact on the amenities of the area”.

DCC goes on to state (at page 19): *“Once complete, the proposed scheme will create attractive, functional and accessible places for people alongside the core bus and cycle facilities which will enhance the amenities of the area”.*

Strategic Observation from the Forward Planning Department of Dublin City Council (Section 2.4.6)

The DCC submission states that the Proposed Scheme will help to achieve the strategic objectives envisaged in the forthcoming Dublin City Development Plan 2022-2028 pertaining to: compact growth; sustainable mobility and permeability; and place making, while significantly contributing towards climate action. DCC further note that while the Scheme is supported, it is important that the Core Bus Corridor adequately addressed conservation impacts along the route.

The NTA notes this comment. In general, the EIAR addresses conservation impacts within EIAR Volume 2 Main Chapters, Chapter 15 Archaeological and Cultural Heritage, Chapter 16 Architectural Heritage and Chapter 17 Landscape (Townscape) and Visual. Specific conservation related comments are responded to subsequently below.

DCC further notes that that the interaction of the Proposed Scheme and the Parkwest Cherry Orchard LAP, proposed SDRAs and KIDS are addressed. The NTA notes this comment. This is set out in response to the Policy Context comment made above.

Planning Assessment- Environment and Transportation Division Comments (Section 2.4.7)

General Comments (Section 2.4.7.1)

The Environment and Transportation Department of DCC set out (on page 20 of its submission) that:

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

DCC stated further that (on pages 20 and 21):

“[t]he 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”.

Dublin City Council went on to state that this will provide better and safer cycling environment and help the bus maintain a steady speed and achieve its journey times.

Traffic Division (Section 2.4.7.2 and Appendix)

On page 21 of its submission, DCC states:

“The Traffic Department 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”.

The Department acknowledges that the modelling work, which was carried out on the corridor of the real-life operation of a full corridor management system using an adaptive traffic control system, allows for a firm basis for how the corridor can be evaluated and to determine its benefits. As set out in the EIAR Volume 2 Main Chapters, Chapter 6 Traffic and Transport, Section 6.4.6.4, between 13% and 20% during the AM and PM Peak hours of the 2028 Opening Year and 2043 Opening Year + 15 Years. Section 6.4.6.3.5.3 states that on an annual basis this equates to approximately 4,200 hours of bus vehicle savings in 2028 and 4,400 hours in 2043.

Similarly, bus network resilience is a key performance criteria as set out in the EIAR Volume 2 Main Chapters, Chapter 6 Traffic and Transport, Section 6.4.6.3.7.2, wherein the Proposed Scheme was tested with an additional 10 buses per hour (from 28 to 38) at the busiest section. As can be seen from Table 6.48 and Diagram 6.25 of the above referenced chapter (Figure 2.3 and Figure 2.4), the results indicate that a high level of journey time reliability is maintained in the Do Something Scenarios, compared to severely impacted in the Do Minimum. This highlights the benefit that the Proposed Scheme infrastructure improvements can provide in protecting bus journey time reliability and consistency, as passenger demand continues to grow into the future.

Table 6.48: G2 Service – Average Bus Journey Times

Direction	Do Minimum (minutes)	Do Minimum (Additional Services) (minutes)	% Difference	Do Something (minutes)	Do Something - Additional Services (minutes)	% Difference
2028 Inbound AM	36.5	37.7	+3.2%	27.1	27.3	+0.8%
2028 Outbound PM	30.0	30.9	+3.0%	27.0	27.3	+1.1%

Figure 2.3 Average Bus Journey Times from Chapter 6 of EIAR Volume 2

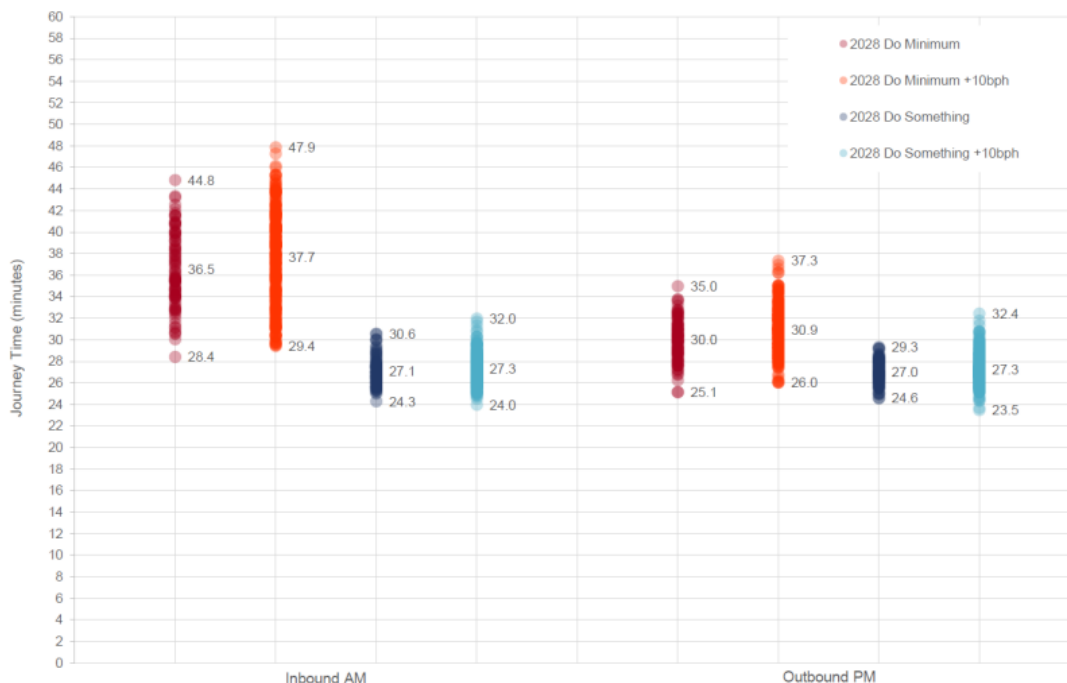


Diagram 6.25: Resilience Testing Bus Journey Time Reliability Indicators - Scenario Testing– Opening Year (2028)

Figure 2.4 Resilience Testing of Bus Journey Time Reliability Indicators from Chapter 6 of EIAR Volume 2

The approach to incorporating the SCATS (Sydney Coordinated Adaptive Traffic System) bus priority measures is set out in PDR Chapter 4 Preliminary Design, Section 4.12.1 and Chapter 12 Traffic Signs, Lighting and Communications, Section 12.10.3 in the Supplementary Information. Through the very positive and constructive liaison with the DCC BusConnects Liaison Office throughout the design and planning process DCC’s Traffic Department is confirming that 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 facilitate improved corridor operation. This digital infrastructure along with the proposed civil infrastructure combine for the Proposed Scheme to meet its objectives.

NTA notes that DCC’s Traffic Department recognises that “NTA is taking over the role of the Road Authority for the purposes of obtaining planning permission for the corridors and that the subsequent construction of the corridors will be undertaken directly by the NTA via their contractors”.

The NTA notes the additional comments from the Traffic Division (Department) which include the following:

- DCC states that the proposed reconfiguration of the Cornmarket area should seek to reuse as much of the existing public realm scheme as possible.

As set out in EIAR Volume 2 Main Chapters, Chapter 4 Proposed Scheme Description, along James’s Street the existing mature trees are to be retained. Furthermore, to retain the

previous public realm scheme, there are no kerb realignments proposed along the majority of James's Street and Thomas Street. The proposed protected cycle tracks will be at carriageway level.

Based on the anticipated reduced traffic flows at the Cornmarket / High Street junction (due to the implementation of the bus gate at Mount Brown a significant junction redesign is proposed. This junction is designed in line with the junction types described in EIAR Volume 4 Appendices Part 1 of 2, Appendix A4.1 BusConnects Preliminary Design Guidance Booklet (PDGB) and seeks to improve public transport, cycling and walking facilities. This junction redesign will also create additional space for the pedestrian environment and facilitate a further public realm improvement scheme at this junction (described in Roads Division response).

- DCC notes that the loss of parking and loading is appropriate in the delivery of the public transport scheme although it notes that deliveries along the Proposed Scheme will need to be managed.

The NTA notes DCC's comments in relation to impact on loading and servicing and the challenge to balance a wide range of competing demands with public transport, pedestrians, cyclists and the private car.

- DCC notes that dynamic traffic management will be required along the Proposed Scheme and will require careful installation and monitoring.

The NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Traffic Division additional comments provided in the Appendix as these matters were the subject of extensive liaison throughout the design development process including consideration of the traffic management equipment that is necessary for the safe and efficient operation of this Public Transport corridor, and including all traffic signal equipment, and the relevant DCC specification. NTA is aware of, and acknowledges, the important role of the relevant DCC maintenance contractor, and their continued role on both the existing and new traffic signals.

Roads Division (Section 2.4.7.3 and Appendix)

The NTA welcomes the comment by DCC that the Roads Department is generally supportive of the scheme and its intention to make bus and cycling provision.

DCC Road Division raises the following comments regarding the BusConnects Scheme:

- The NTA notes the request by the Roads Division that, across the scheme area, pedestrians should be ensured priority through signage and other appropriate measures, further requesting that this be made a condition.

With regard to ensuring Pedestrian Priority, additional physical interventions along the Proposed Scheme, such as enhanced/additional pedestrian crossings, raised table side entry treatments, and enhanced cycling infrastructure, have been assessed in the EIAR (Volume 4 Appendices Part 1 of 2, Chapter 6 Traffic and Transport Appendices) Appendix 04 and summarised in Appendix A6.1 Traffic Impact Assessment Report, Section 8. These interventions, which form part of the Proposed Scheme, further enhance the movement hierarchy emphasis in line with the Proposed Scheme Objectives.

EIAR Volume 2 Main Chapter, Chapter 6 Traffic and Transport, Section 6.4.6.2.5.1 describes that the Proposed Scheme will increase the number of controlled pedestrian crossings from 71 in the Do Minimum to 102 in the Do Something scenario, equating to a 44% increase. Additionally, there will be an increase in the number of raised table crossings on side roads from 22 in the Do Minimum to 69 in the Do Something scenario, equating to a 213% increase.

The NTA welcomes DCC's comments in relation to the importance of considering the pedestrian/cyclist interaction at bus stops and notes that EIAR Volume 2 Main Chapters, Chapter 4, Proposed Scheme Description and Appendix A4.1 Preliminary Design Guidance Booklet (PDGB) for BusConnects Core Bus Corridor Section 11, set out the key measures to address the concerns raised in relation to vulnerable users at these locations which is further elaborated in PDR Chapter 4 Preliminary Design, Section 4.14 in the Supplementary

Information. These details were developed as a result of direct consultation between the NTA and representative mobility groups.

These measures will reduce the potential for conflict between pedestrians, cyclists and stopping buses by deflecting cyclists behind the bus stop, thus creating an island area for boarding and alighting passengers.

On approach to the bus stop island the cycle track is intentionally narrowed with yellow bar markings also used to promote a low-speed single file cycling arrangement on approach to the bus stop. Similarly, a 1 in 1.5 typical cycle track deflection is implemented on the approach to the island to reduce speeds for cyclists on approach to the controlled pedestrian crossing point on the island.

To address the potential pedestrian/cyclist conflict, a pedestrian priority crossing point is provided for pedestrians accessing the bus stop island area. At these locations a 'nested Pelican' sequence similar to what has been provided on the Grand Canal Cycle Route will be introduced so that visually impaired or partially sighted pedestrians may call for a fixed green signal when necessary and the cycle signal will change to red. Where the pedestrian call button has not been actuated the cyclists will be given a flashing amber signal to enforce the requirement to give way to passing pedestrians. A 1:20 ramp is provided on the cycle track to raise the cycle track to the level of the footpath/island area onto a wide crossing. Suitable tactile paving is also provided at the crossing point in addition to a series of LED warning studs provided at the crossing location.

The NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Roads Division comments as these matters were the subject of extensive liaison throughout the design development process. The NTA will however continue the very positive and constructive liaison with DCC throughout the detailed design and construction process.

- DCC Roads Division outlines similar comments about the Cornmarket urban realm improvements to those made by the Traffic Division through Section 2.4.7.3 and the Appendix). DCC makes a number of alternative junction layout arrangements suggestions.

EIAR Volume 2 Main Chapters, Chapter 17 Landscape (Townscape) and Visual, Section 17.4.1.2 states that the Cornmarket junction was redesigned and enhanced to provide better walking and cycling provision, whilst all access is maintained, the priority has shifted from High Street/ Thomas Street to High Street/ Bridge Street Upper. High quality urban realm has been added to the design to improve the visual appearance of the area and create additional space for pedestrian movement. The alignment design on Thomas Street, near Cornmarket, was altered to avoid impacting the mature trees and to provide more public realm opportunities.

The NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Roads Division additional comments provided in the Appendix as these matters were the subject of extensive liaison throughout the design development process. The NTA will however continue the very positive and constructive liaison with DCC throughout the detailed design and construction process.

- DCC request that additional kerbside loading spaces are provided along Thomas Street.

In developing the design of the Proposed Scheme, the NTA has balanced the need to provide parking and loading with the objectives of the Proposed Scheme to provide high quality public transport, cycling and walking facilities through this area. As such, some parking and loading has been removed or relocated in close proximity to its current location.

As noted in the submission and detailed in EIAR Volume 2 Main Chapters, Chapter 6 Traffic and Transport, it is proposed to remove the existing loading bays along Thomas Street between Meath Street and Vicar Street to facilitate improved cycle and bus facilities.

Specifically relating to the two loading bays on Bridge Street the following is noted in Chapter 6:

'The provision of two loading bays the R810 Cornmarket left turn slip road. Taking cognisance of the removal of one loading bay between Thomas Court and Meath Street, the removal of five loading bays between Meath Street and Francis Street, and the removal of three loading bays between R810 Cornmarket and Winetavern Street along High Street, the impact of this gain is considered to have a Negligible and Long-term effect'.

This negligible effect is considered acceptable in the context of the aim of the Proposed Scheme, to provide enhanced walking, cycling and bus infrastructure on this key access corridor.

The Parking Survey Report (Appendix G to the Preliminary Design Report included in the Supplementary Information) identifies that retention of the existing layout to preserve the loading bays would reduce the quality of service for city buses and coach buses due to conflicts which would undermine the fit of the proposals with the Scheme objectives. The Parking Survey Report also identifies that there are a number of side streets in the area which may accommodate deliveries, notably the loading bays on Meath Street.

- DCC notes the proposals to amend the junction layouts at St James's Hospital and at Mount Argus which they note will be impacted by National Children's Hospital development.

The Proposed Scheme is designed to be compatible with consented planning permissions along the route, including the new Children's Hospital. As such, it is proposed to retain the two exit lanes on the St James's Hospital arm of the junction. During the Bus Gate hours of operation, traffic leaving the Children's hospital from this arm (AM peak) will be required to turn left to avoid the Bus Gate. Additional signage will be erected to advise motorists of the restrictions.

As outlined in the Transport Modelling Report, in EIAR Volume 4 Appendices Part 2 of 2 Appendix A6.2 (Transport Modelling Report), a suite of forecast transport modelling tools has been developed to support the design development and assessment of the Proposed Scheme. The traffic and transport impact assessment for the Proposed Scheme, has been informed by this suite of modelling tools and has been undertaken in accordance with latest guidance including the 'Guidelines on the Information to be contained in Environmental Impact Assessment Reports' (EPA 2017), the 'Traffic and Transport Assessment Guidelines' (TII 2014), the National Cycle Manual (NTA 2011) and the UK Design Manual for Roads & Bridges (DMRB), Volume 11, Section 2, Part 5 (UK Highways Agency 2011).

- DCC notes that, at the location of Cherry Orchard Hospital there is a portion of access road included within the scheme boundary, that is believed to be a private road and not controlled by DCC, therefore this needs to be taken into account.

At this location, the Proposed Scheme is within the existing road boundary and no works are proposed beyond the junction. The Proposed Scheme will upgrade the existing DCC traffic equipment at this junction as well as amending the road marking arrangements.

- DCC also states that considerations should be given to the retention of the bus stops directly outside the Ballyfermot Primary Care Centre.

The Proposed Scheme has provided relocated bus stops a similar distance to the east of the Centre, the bus stops have been positioned as not to interfere with the junctions for Industrial Estate access, Cloiginn Park, access to the Football Club and other minor access points to the south. The methodology for assessing and refining the locations for the bus stops along the Proposed Scheme has been summarised in PDR Chapter 4 Preliminary Design, Section 4.13, provided as part of the Supplementary Information. In line with this, the basic criteria considered when locating bus stops are as follows:

- Driver waiting and passengers are clearly visible to each other;
- Located close to key facilities;
- Located close to main junctions without affecting road safety or junction operation;
- Located to minimise walking distance between interchange stops;
- Where there is space for a bus shelter;
- Located in pairs, 'tail to tail' on opposite sides of the road;

- Close to (and on exit side of) pedestrian crossings;
- Away from sites likely to be obstructed; and
- Adequate footway width.

A stand-alone document (Bus Stop Review Methodology) has also been developed to assist in this process and is included in as PDR Appendix H. The bus stop locations were reviewed at each stage of the design process with a view to ensuring that the objectives of the Proposed Scheme were met.

Retaining the bus stop at this location would result in inadequate bus stop spacing along Ballyfermot Road.

- DCC expresses concern throughout their submission on the use of ramped crossings along the core bus corridor. Concerns detailed include reference to ramped crossings having a short service life, reducing the quality of ride for bus passengers and crossing implications for mobility and visually impaired users. DCC requests that speed cushions be used for any necessary traffic calming measures.

The Public Consultation Report 2018-2022 provided in the Supplementary Information for the Proposed Scheme outlines the extensive public consultation and stakeholder engagement undertaken during that period, with three rounds of non-statutory public consultation undertaken. Throughout the three rounds a number of consultation tools were used including Community Forum events to create a two-way communication process with representatives of local communities.

As part of the Proposed Scheme, it is proposed to remove the existing chicanes which provide traffic calming along the Ballyfermot Road. During the community forum, the local community requested that new traffic calming measures were implemented as part of the Proposed Scheme. As a result, ramped crossings have been proposed along Ballyfermot Road which are designed to reduce speeds of vehicles travelling along the road.

- DCC queries whether access to the car park at the Ballyfermot Civic Centre will be retained.

Access to the Ballyfermot Civic Centre will be retained from Ballyfermot Road and formal parking will be retained in this location.

- DCC raises queries around the removal of parallel roads on Ballyfermot Road and the impact of this to residential parking.

In developing the design of the Proposed Scheme, the NTA has balanced the need to provide parking and loading with the objectives of the Proposed Scheme to provide high quality public transport, cycling and walking facilities through this area. As such, some parking and loading has been removed or relocated in close proximity to its current location.

Specifically relating to the removal of parallel roads on Ballyfermot Road it is noted in Chapter 6:

The reduction from six to five informal general residential parking spaces on the northern side of Ballyfermot Road between Cherry Orchard Service station and Cleegan Park. At this location, it is proposed to remove the existing parallel access roads and to formalise the parking arrangement, creating space to provide segregated bus and cycle infrastructure. There are approximately 50 parking spaces along the side streets within 100m of this location. Therefore, the loss of one space at this location is considered to have a Negligible and Long-term effect;

The reduction from 50 to 47 informal general residential parking spaces on the northern side of Ballyfermot Road between Cleegan Park and Clifden Road. At this location, it is proposed to remove the existing parallel access roads and to formalise the parking arrangements, creating space to provide segregated bus and cycle infrastructure. The majority of residential properties adjacent to these lost spaces have off-street parking within driveways and there are approximately 390 parking spaces along the side streets within 100m of this location. Therefore, the loss of spaces at this location is considered to have a Negligible and Long-term effect;

The reduction from 35 to 29 informal general residential parking space on the southern side of Ballyfermot Road between Cleegan Park and Clifden Road through the removal of existing parallel access roads and formalisation of parking. This revised parking arrangement enables the creation of space to provide segregated bus and cycle infrastructure and formalised parking bays and results in the loss of six car parking spaces at this location. The majority of residential properties adjacent to these lost spaces have off-street parking within driveways and there are approximately 250 parking spaces along the side streets within 100m of this location. Considering this, the impact of this loss of parking is considered to have a Negligible and Long-term effect;

The removal of 25 informal general residential parking spaces on the southern side of Ballyfermot Road between Clifden Road and the mid-link pedestrian crossing through the removal of the existing parallel access road. This removal enables the creation of space to provide segregated bus and cycle infrastructure. The majority of residential properties adjacent to these lost spaces have offstreet parking within driveways and there are approximately 85 parking spaces along the side streets within 100m of this location. Considering this, the impact of removing 25 spaces is considered to have a Negative, Slight and Long-term effect;

This slight negative to negligible effect is considered acceptable in the context of the aim of the Proposed Scheme, to provide enhanced walking, cycling and bus infrastructure on this key access corridor.

- DCC queries the access and parking arrangements at commercial units at the junction of Ballyfermot Road and Le Fanu Road and query whether large service vehicles will be accommodated.

EIAR Volume 2 Main Chapters, Chapter 6 Traffic and Transport, Section 6.4.6.2.2.4 sets out an assessment of car parking loss in the scheme section between Liffey Valley and Le Fanu Road. Specifically at this location it is stated:

'The removal of nine commercial parking spaces on the northern side of Ballyfermot Road on the northwest corner of R833 Ballyfermot Road / Le Fanu Road Junction... enables the creation of space to provide segregated bus and cycle infrastructure. There are approximately 55 parking spaces on side streets within 100m of this location and 14 Pay and Display spaces retained to the south of this location. Therefore, the removal of nine parking spaces at this location is considered to have a Negative, Slight and Long-term effect.'

In this specific area, the proposed cross-section and subsequent land acquisition has been considered and deemed necessary to facilitate the optimum scheme as presented in EIAR Volume 3 Figures, Chapter 4 Proposed Scheme Description, General Arrangement drawings.

The Proposed Scheme has been designed to deliver upon the scheme objectives set out in EIAR Volume 2 Main Chapters, Chapter 1 Introduction to deliver a Core Bus Corridor and significantly increasing the Level of Service of the provision for pedestrians and cyclists. In some areas, CPO is required to deliver what has been determined to be the most appropriate design configuration that meets these objectives. All areas included in the CPO have been carefully considered and only included where deemed absolutely necessary to meet the scheme objectives and to construct the scheme with permanent and temporary acquisitions respectively. Appendix G (Parking Survey Report) of the PDR notes that retaining the existing layout would result in reduced quality of service for busses, cyclists, and motorised vehicle traffic which would undermine the overall scheme objectives.

Parallel parking has been designed as per the Adopted Design Parameters set out in the BusConnects Preliminary Design Guidance Booklet which has been designed in line with DMURS.

- DCC advised of a lack of footpath along Le Fanu Road and the Junction with Ballyfermot Road.

Sheet 11 of the General Arrangement drawings shows continuous footpath along Le Fanu Road.

- DCC states access arrangements for a permitted development on the west side of Kylemore Road needs to be taken into consideration.

Provision for permitted development along the route has been made within the development of the Proposed Scheme.

- DCC queries the access arrangements for the Ballyfermot Resource Centre

The current access arrangements from Ballyfermot Road will be maintained as part of the Proposed Scheme.

- DCC states that cognisance should be taken of the live substantial residential application, including access arrangements, for De La Salle site.

As set out in EIAR Volume 4 Appendices Part 1 of 2, Appendix A2.1 Planning Report, the NTA is aware of this planning application and has been in discussions with the developer to ensure consistency between the two schemes.

- DCC queries the rationale for the closure of O'Hogan Road and queries whether there is sufficient space for turning vehicles.

As set out in EIAR Volume 2 Main Chapters, Chapter 4 Proposed Scheme Description, to reduce the impact on Markiewicz Park and the adjacent residential properties, it is proposed to provide Signal Controlled Bus Priority for citybound buses with the traffic signals sequenced to ensure full bus priority. The citybound bus lane would then be reintroduced at St. Laurence's Road. To accommodate the revised arrangements and, to facilitate bus priority, it is intended to close the junction of O'Hogan Road and Ballyfermot Road. O'Hogan Road can still be accessed via Garryowen Road and Decies Road.

The closing of the northern end of O'Hogan Road creates an opportunity for a small-scale local intervention featuring good quality concrete paving, a proposed tree, ornamental planting and a curved feature bench. This enhancement will complement the park and residential setting while retaining filtered permeability for cycling into O'Hogan Road.

The existing carriageway at O'Hogan Road is wide and there will be sufficient space for turning vehicles at the road closure. Additional signage will also be implemented to ensure motorists are informed of the cul-de-sac arrangement.

- DCC raises concerns around the access to St Laurence's Glen due to the relocation of the bus stop.

There is no impact on access or egress to St Laurence's Glen due to the relocation of the bus stop.

Following the assessment carried out in PDR Appendix H (Bus Stop Review) provided in the Supplementary Information, no bus stop is proposed outside the car park. The closest stops are located approximately 250m west of the apartment, at the northwest of Markiewicz Park, and approximately 140m east of the apartments, outside St. Laurence's Glen apartments, as seen in the EIAR Volume 3 Figures, Chapter 4 Proposed Scheme Description, General Arrangement drawings.

The design of the proposed scheme at this location complies with the visibility requirements set out in section 4.4.5 of DMURS. The Safety Audits undertaken for the Proposed Scheme, included as Appendix M of the Preliminary Design Report provided in the Supplementary Information did not highlight any safety issues with the proposed arrangement in this regard.

Regarding construction impact, when roads and streets are being upgraded, there will be some temporary disruption / alterations to access to premises in certain locations along the Proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. As described in EIAR Volume 2 Main Chapters, Chapter 5 Construction, Section 5.5.3.1, details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area. The duration of the works will vary from property to property, but access and egress will be maintained at all times, where practicable.

- DCC queries the access and parking arrangements for United Tyres and regarding the commercial properties on the south side of Sarsfield Road.

The site boundary line and temporary land acquisition boundary are shown in the General Arrangement drawings. These demonstrate that land acquisition is proposed at the United Tyres. The duration of the works will vary but access and egress will be maintained during the work at all times, where practicable. During operation of the Proposed Scheme access and parking will be retained to United Tyres. The NTA have engaged with the landowner and aware of the future proposals to redevelop this site into a residential development.

There is no impact to access or parking at the Sarsfield Service Station and commercial properties on the south side of Sarsfield Road.

- DCC requests clarification on how businesses will operate during the temporary land acquisition at the junction of Sarsfield Road and First Avenue.

When roads and streets are being upgraded, there will be some temporary disruption / alterations to on-street and off-street parking provision, and access to premises in certain locations along the Proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. As described in in EIAR Volume 2 Main Chapters, Chapter 5 Construction, Section 5.5.3.2, details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area. The duration of the works will vary from property to property, but access and egress will be maintained at all times, where practicable.

- DCC requests clarification of street layout and railing design below the railway bridge.

As per PDR Appendix B4 Typical Cross Sections, sheets 13 and 14 and PDR Table 4.2, the footpath adjacent to the westbound / outbound carriageway will be increased to 2.0m wide at a minimum. Due to the width constraints associated with the bridge, the footpath adjacent to the eastbound / inbound carriageway will terminate before the railway bridge. To facilitate this, pedestrian crossings are available to the north and south of the bridge. There are no railings proposed at this location.

- DCC considers the removal of the pedestrian crossing from the western side of Memorial Road/ Con Colbert Road junction to be undesirable.

As set out in the General Arrangement drawings (EIAR Volume 3 Figures Chapter 4 Proposed Scheme Description), signalised pedestrian crossings are proposed on the eastern and southern sides of the (R148) Con Colbert Road / Memorial Road junction. The rationale for this is set out in the Lucan to City Centre PDR (Section 3.1.4):

At the junction between the R148 Con Colbert Road and Memorial Road, the pedestrian crossing has been moved to the east side of the junction to be on the same side as the bus stops.

The Level of Service (LoS) assessment presented in EIAR Volume 2 Main Chapters, Chapter 6 Traffic and Transport, highlights the improvements at this junction as a result of the Proposed Scheme. The Level of Service for pedestrians improves from an E to a B at this junction with the Proposed Scheme which has been assessed as having a medium positive impact.

- DCC notes that tie-in with the Emmet Road development should be considered within the Proposed Scheme.

Should the development receive planning approval and begin construction prior to the Proposed Scheme, the NTA will work with the local authority to ensure both schemes are compatible.

- DCC notes that the raised table at the junction of Emmet Road / Camac Close should be removed.

It is proposed to retain the existing raised table at this location to facilitate match day pedestrian movements associated with St Patrick's Athletic Football Club.

- DCC considers the provision of perpendicular parking onto busy roads as undesirable and requests angle or parallel parking is considered.

In designing the geometrical elements of the Proposed Scheme, a balanced approach to the requirements for each of the road functions from a people movement perspective is needed, noting that the aim of the Proposed Scheme is to provide enhanced walking, cycling and bus infrastructure. Table 4-1 in the PDR demonstrates how the perpendicular parking is in line with DMURS. Furthermore, Road Safety Audits undertaken for the Proposed Scheme, included as PDR Appendix M provided in the Supplementary Information, do not highlight any safety issues with the proposed arrangement in this regard.

- DCC requests that loading on South Circular Road at Kilmainham Village is retained.

EIAR Volume 2 Main Chapters, Chapter 6, Traffic and Transport, Section 6.4.6.2.3.4, sets out the impact on parking and loading within this section (Section 2 – Le Fanu Road to Sarsfield Road) of the Proposed Scheme. As set out in Chapter 6 of the EIAR, no removal of loading spaces is proposed on South Circular Road.

- DCC notes that the footpath on Old Kilmainham footpath is narrow on the southern side and requests that the footpath is widened at the pedestrian crossing.

In line with the Road User Hierarchy designated within DMURS, at pinch points, the width of the general traffic lane should be reduced first, then the width of the cycle track should be reduced before the width of the pedestrian footpath is reduced. For the majority of the Proposed Scheme extents minimum lane widths have been adopted throughout. Throughout the scheme, footway widths of 2m or wider have been proposed, with the exception of a limited number of stretches where a width of 1.8m or greater is proposed due to the presence of localised space constraints.

At this location the existing cross section is constrained and there are no plans for intervention works at this location. Whilst no footpaths widened is proposed, speed limits will also be reduced from 50km/h to 30km/h improving the pedestrian environment.

- DCC notes that the design at the National Children's Hospital should be consistent with the permitted Strategic Infrastructure application.

The Proposed Scheme is designed to be compatible with consented planning permissions along the route, including the new Children's Hospital. As such, it is proposed to retain the two exit lanes on the St James's Hospital arm of the junction. During the Bus Gate hours of operation, traffic leaving the Children's hospital from this arm (AM peak) will be required to turn left to avoid the Bus Gate. Additional signage will be erected to advise motorists of the restrictions.

As outlined in the Transport Modelling Report, in EIAR Volume 4 Appendices Part 1 of 2, Appendix A6.2 Transport Modelling Report, a suite of forecast transport modelling tools has been developed to support the design development and assessment of the Proposed Scheme. The traffic and transport impact assessment for the Proposed Scheme, has been informed by this suite of modelling tools and has been undertaken in accordance with latest guidance including the 'Guidelines on the Information to be contained in Environmental Impact Assessment Reports' (EPA 2017), the 'Traffic and Transport Assessment Guidelines' (TII 2014), the National Cycle Manual (NTA 2011) and the UK Design Manual for Roads & Bridges (DMRB), Volume 11, Section 2, Part 5 (UK Highways Agency 2011).

- DCC requests that the scheme considers improvement to the main access/egress at James's Hospital (such as signalisation) and retains the cycle track at the edge of the footpath.

No change to the pedestrian / cycling infrastructure is proposed at this location as part of the Proposed Scheme.

- DCC notes Echin Street is designated as a quiet street for cycling and currently is subject to intensive redevelopment near a pre-existing development site.

The Proposed Scheme seeks to provide long term benefits for public transport and walking and cycling. Redevelopment in the vicinity of Echlin Street is considered to be short term and therefore not impacting the long term benefits the Proposed Scheme offers.

- DCC notes that the redevelopment of the Guinness Quarter and the indented drop off /loading facility should be considered in the Proposed Scheme.

In discussions with the developer and as set out in the NTA's comments on the respondent's planning application (application reference 4588/22), the NTA has outlined that any changes to the bus stop location and / or the introduction of drop-off or lay-by facilities on this corridor would not be supported. As such, the NTA welcomes the developers proposal which does not include any changes of this nature to the public road. The NTA will continue to work with the local authority and developers subject to the conclusion of their planning process.

- DCC suggests the removal of loading bay and accessible space outside Farrow and Ball Paints be reconsidered.

As part of the Proposed Scheme is it proposed to provide a new loading bay and accessible parking space on the R810 Cornmarket left turn slip road.

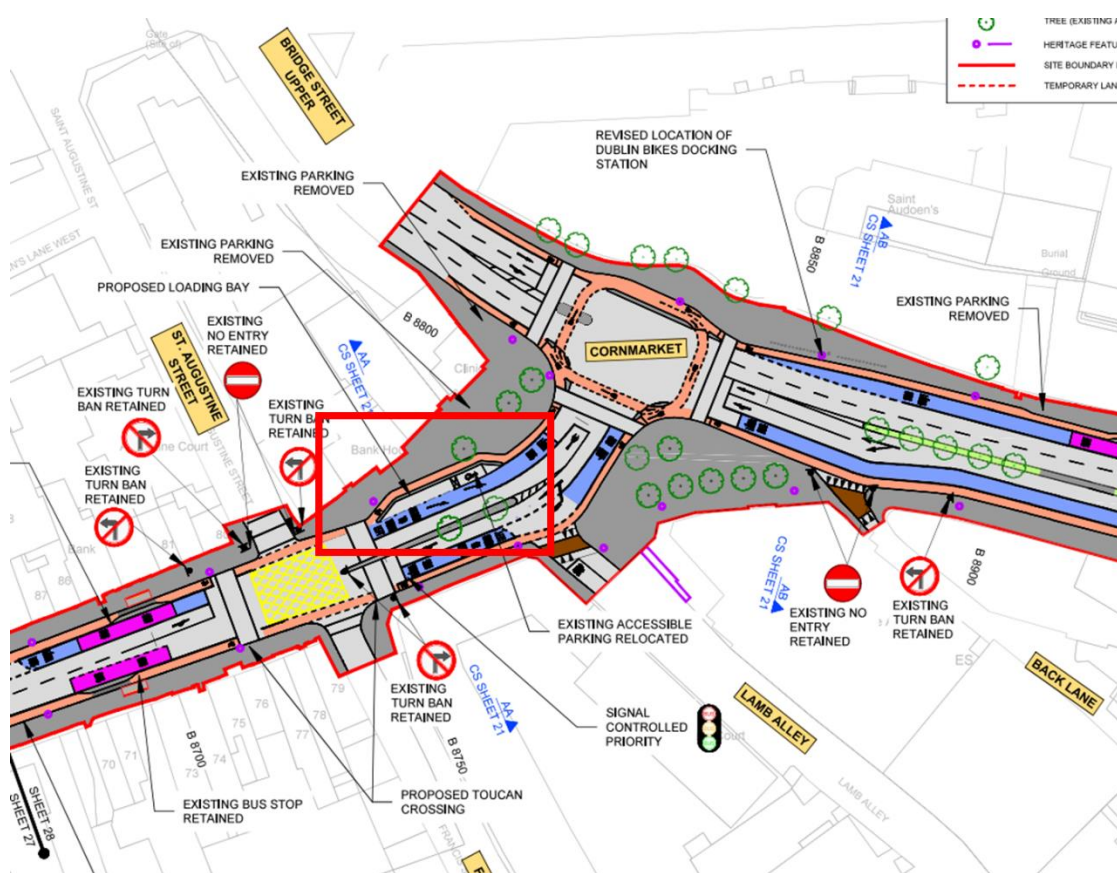


Figure 2 5: Extract from General Arrangement Drawing (annotation added)

These changes are considered in the EIAR Volume 2 Main Chapters, Chapter 6 Traffic and Transport, Section 6.4.6.2.4.4, which states:

'The removal of four Pay and Display parking spaces along the R810 Cornmarket left turn slip road to provide bus priority and enhanced pedestrian and cyclist facilities. There are over 50 alternative parking spaces within 100m of this location on surrounding streets and therefore the impact of losing five spaces at this location is considered to have a Negligible and Long-term effect;' and

'The provision of two loading bays the R810 Cornmarket left turn slip road. Taking cognisance of the removal of one loading bay between Thomas Court and Meath Street, the removal of five loading bays between Meath Street and Francis Street, and the removal of three loading bays between R810 Cornmarket and Winetavern Street along High Street, the impact of this gain is considered to have a Negligible and Long-term effect.'

This negligible effect is considered acceptable in the context of the aim of the Proposed Scheme, to provide enhanced walking, cycling and bus infrastructure on this key access corridor.

- DCC makes a number of comments on the Proposed Scheme at the Cornmarket / Thomas Street/ High Street Junction considering that it should retain the current priority, concerns that left turning vehicles from Cornmarket to Bridge Street Upper will block the junction and alternative cyclist / pedestrian infrastructure arrangements. DCC also note that a high quality public realm scheme was undertaken at the junction in 2008.

As part of the Proposed Scheme (and as set out in EIAR Volume 2 Main Chapters, Chapter 4 Proposed Scheme Description, Section 4.5.3.1):

“At the Cornmarket junction the priority has been changed from High Street / Thomas Street to High Street / Bridge Street Upper. The junction has also been refined to remove the existing islands and provide improved walking and cycling facilities. The Proposed Scheme will join the City Centre traffic management regime at the junction with Nicholas Street and Winetavern Street.”

This junction has been subject of various rounds of iterative design and engagement with the various iterations of the junction design set out in EIAR Volume 4 Appendices Part 1 of 2, Appendix A6.3 Junction Design Report. Following the various designs, supported by modelling, a Type 2 junction is proposed. Junction Type 2, as described in EIAR Volume 4 Appendices Part 1 of 2, Appendix A4.1 PDGB, Section 7.4.1 comprises a signalised junction in a sub-urban context, where there is room for additional lanes.

Junction Type 2 is chosen for the following reasons:

- Sub-urban setting where space is available for a dedicated left turning lane/pocket,
- High volumes of left-turning traffic which can be controlled separately with exiting traffic from side roads.

This junction type is considered appropriate for Cornmarket in the context of the Proposed Scheme on the basis that the bus gate at Mount Brown will reduce the traffic flows along Thomas Street.

Pedestrian crossings have been placed as close to pedestrian desire lines as practicable and have been designed to be limited in length (in line with DMURS). An assessment of the existing pedestrian arrangement compared to the Proposed Scheme has been set out in EIAR Volume 4 Appendices Part 1 of 2, Appendix A6.4.1 Impact Assessments and summarised in EIAR Volume 4 Appendices Part 1 of 2 Appendix A6.1 Transport Impact Assessment Report, Section 8. The results of the assessment demonstrate that the Level of Service at the Cornmarket junction increases from an E rating to an A rating with the Proposed Scheme. The improvements will have a High Positive Impact for the Proposed Scheme through increasing the number and directness of pedestrian crossings at the junction as well as the increase in footpath widths.

An assessment of the existing cyclist arrangement compared to the Proposed Scheme has been set out in EIAR Volume 4 Appendices Part 1 of 2, Appendix A6.4.2 Impact Assessments and summarised in EIAR Volume 4 Appendices Part 1 of 2 Appendix A6.1 Transport Impact Assessment Report, Section 8. The results of the assessment demonstrate that the Level of Service along R810 Thomas Street (St Augustine Street to High Street) increases from a C rating to a B rating with the Proposed Scheme. The improvements will have a Low Positive Impact for the Proposed Scheme through increasing segregation and cycle lane widths.

- Public realm improvements in the area are not clear.

As set out in EIAR Volume 2 Main Chapters, Chapter 4 Proposed Scheme Description, Section 4.5.3.8.9, *High quality urban realm is proposed at Cornmarket junction with significant junction redesign that will create additional space for the pedestrian environment (see Image 4.14). High quality granite paving with wide granite kerbs and a coordinated banding feature to visually tie both sides of the junction together are proposed. The outline of the historic city wall will be interpreted through a granite band on either side of the road. The south side of the*

junction will see a widened area of footway creating a shady plaza incorporating seating integrated with raised planters and new tree planting. Existing trees are to be retained and, along with new wayfinding, cycle racks and street furniture, will enhance this area of urban realm and tourist route.

An extract of Image 4.14 of Chapter 4 in Volume 2 of the EIA, showing the High Quality Urban Realm Proposed at Cornmarket Junction, is included below in Figure 2.6.

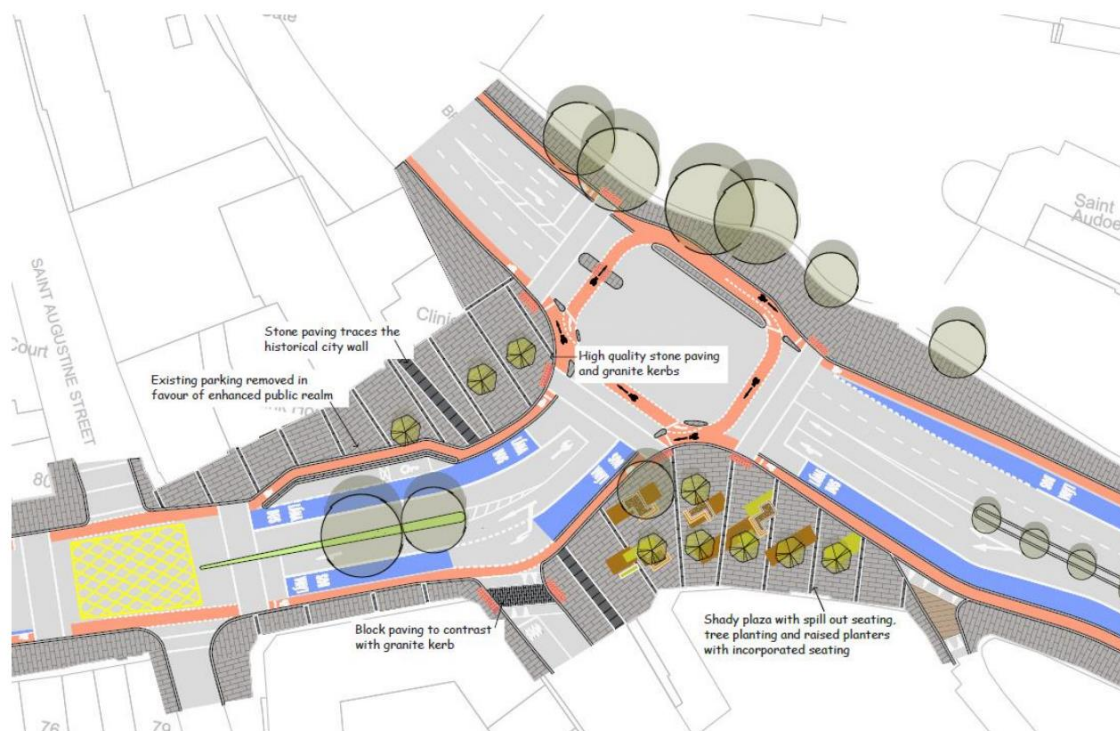


Figure 2.6 Extract of Image 4.14 from Chapter 4 in Volume 2 of the EIA

These improvements can be seen in Photomontage 30, in EIA Volume 2 Main Chapters, Chapter 17 Landscape (Townscape) & Visual, Section 17.2.14.2 which shows the proposed view taken from Cornmarket looking east. This image is reproduced in Figure 2.7 below.

The primary change to the view is the removal of the left turn slip road with parked cars and change to a continuous pedestrianised paved area in light coloured natural stone with dark stone banding running perpendicular to the road. The dark band of paving indicating the historic alignment of the city wall is retained, and there is the introduction of new street trees, shown at a well-established stage. All existing trees within the view are retained with the exception of one which is hidden behind the trunk of a tree in the foreground. There is a change in the road layout to accommodate a loading area to the left and reallocation of the two outer general traffic lanes to bus lanes. The cycle lane on the left is removed and replaced with a cycle track segregated by a block paved boundary. There is a notable positive change to the character and visual amenity resulting from the creation of a high quality pedestrianised area with new street trees to the south side of Cornmarket junction.

Section 13.4.1.1 outlines the key design principles for the proposed surface water management design for the scheme.

The design of the Proposed Scheme has taken account of the requirement under the EU Water Framework Directive to protect and improve water quality in all waters, including surface waters. This includes recognition that the surface water drainage network impacted by the Proposed Scheme outfalls to a number of protected waterbodies that are identified as Priority Areas for Action under the Water Framework Directive's 2nd and 3rd River Basin Management Plans, and that these contiguous waterbodies are protected waterbodies under Article 4 of the Water Framework Directive. To support the achievement of the legislative obligations the Proposed Scheme is designed to ensure no deterioration of the status of any waterbody to which it is contiguous with downstream and will not jeopardise the attainment of good ecological and good surface water chemical status.

Detailed Drainage Design Comments

DCC raised a number of comments on the drainage design as follows:

- DCC stated that while an increase in permeable areas in some sections is welcome, consideration should still be given to SuDS treatment of runoff whenever possible. Nature based solutions should be used throughout rather than oversized pipes.

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

At the locations referenced by DCC:

- At the Kylemore Road / Ballyfermot Road junction it is proposed to pave the centre of the existing roundabout (as shown in EIAR Volume 3 Figures, 11. Proposed Surface Water Drainage Works, Sheet 13). However, greening is proposed at each corner of the proposed junction. The additional impermeable area here is effectively balanced by the additional permeable area, removing the need for attenuation at this location. The small area of impermeable area is drained through piped network to the attenuation structure (chainage B3200).
- At Ballyfermot Road (chainage B3200) the catchment (Catchment 10 - running between B2800 and B3600) is in majority paved, with the exception of a 3-8m wide patch of permeable area on the northern side of Ballyfermot Road. The proposed drainage here takes advantage of this permeable area and can accommodate the attenuation requirements.
- DCC states the drawings are to be checked throughout the submission to ensure compliance with Greater Dublin Regional Code of Practice noting that manholes are not currently displayed on the drawings.

Manholes will be proposed at regular distances and at pipe ends and connections. Appendix K of the Preliminary Design Report (Drainage Design Basis Document) states:

In accordance with Greater Dublin Regional Code of Practice Section 11.6, the length of pipe-work from manhole to manhole should not exceed 90metres.

- DCC requests that river networks are to be included on all drawings.

Rivers are shown in on the General Arrangement drawings in blue and are annotated on the Proposed Surface Water Drainage Works drawings only to ensure legibility of the proposed works on the other drawings.

- DCC stated that the design should be checked around chainage B3800 – B4200 as the attenuation volume in the text box is not consistent with that shown in the leader.

The proposed dry detention basin will provide 129 m³ of attenuation as stated in text box. The NTA notes this point. This is not considered to be a material issue and there is no change to the assessment undertaken in Chapter 13 of the EIAR.

- DCC stated that the design should be checked around chainage B4200 – B4700 with the volumes provided.

Design catchment 12 (B4200 – B4700) is attenuated through oversized pipes ranging between 375 and 500 mm. 29m³ of attenuation will be provided. This is not considered to be a material issue and there is no change to the assessment undertaken in Chapter 13 of the EIAR.

- DCC stated that the design should be in accordance with the Dublin City Council Sustainable Drainage Design and Evaluation Guide 2021.

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

The NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Drainage comments provided in the Appendix as these matters were the subject of extensive liaison throughout the design development process. The NTA will however continue the very positive and constructive liaison with DCC throughout the detailed design and construction process.

Conditions / Recommendations

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

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

Sustainable Drainage and Permeability

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

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

The details of drainage measures proposed for each catchment and subsequently each water body are provided in Table 13.12 in EIAR Volume 2 Main Chapters, Chapter 13 Water. It is noted that no new outfalls are proposed as part of the Proposed Scheme.

Drainage Details

A number of comments refer to the proposed drainage details included in the 'BusConnects Core Bus Corridor Drainage Design Basis' which is noted in EIAR Volume 2 Main Chapters, Chapter 4 Proposed Scheme Description, Section 4.6.15.4 as one of the relevant guidance documents for drainage design. This document is included as PDR Appendix K in the Supplementary Information. In this regard it is noted that the Proposed Scheme, and indeed the BusConnects Dublin Infrastructure Works as a whole, interacts with numerous local authorities, who may have differing requirements in relation to drainage details.

The BusConnects Core Bus Corridor Drainage Design Basis' document includes options for consideration that have been developed with regard to the necessary standards and good industry practice. The NTA will continue to liaise closely with Dublin City Council Environmental Protection Department.

Flood Risk

The Flood risk associated with the Proposed Scheme is dealt with within the Flood Risk Assessment included in EIAR Volume 4 Appendices Part 2 of 2, Appendix A13.2. The FRA has been prepared in accordance with the Department of the Environment, Heritage and Local Government (DEHLG) and the Office of Public Works (OPW) Planning System and Flood Risk Management - Guidelines for Planning Authorities (hereafter referred to as the FRM Guidelines) (DEHLG and OPW 2009). The Flood Risk Assessment covers three stages of a Site Specific Flood Risk Assessment (Identification of flood risk, initial flood risk assessment and detailed assessment supported by CFRAM hydraulic modelling). The Flood Risk Assessment also includes the 'Development Management Justification Test' (box 5.1 of the 2009 Planning System Flood Risk Management Guidelines), and concludes that the development satisfies the requirements of the Development Management JT (Justification Test). Refer to section 2.3 of the Flood Risk Assessment report.

In relation to pluvial flood risk, it should be noted that all of the proposed networks have been modelled independently of their length. The proposed networks are attenuated to existing runoff rates before discharging to the existing network. Where possible, SuDS and Green Infrastructure measures have been incorporated, preference has been given to nature based SuDS solutions (tree pits/rain gardens interlinked by filter drains) however the following two constraints were experienced in the design.

Where the SuDS solution will not provide sufficient storage to attenuate the discharge down to the allowable discharge rates, oversized pipes will be used to augment the storage capacity of the SuDS solutions.

Where there is no space available in the public realm to accommodate a SuDS solution due to the presence of existing underground utilities, the solution will be to utilise oversized pipes.

It is not feasible to provide a separate surface water network in areas where there is no space for it due to the presence of existing underground utilities.

Archaeological Section Comments (Section 2.4.8)

This section summarises the observations set out in Section 2.4.8 (including reference to the Appendix) and NTA responses.

NTA acknowledge that DCC's Archaeology Section states that the EIAR chapter provides a comprehensive desk study of published and unpublished documentary and cartographic sources, supported by a field study. This section (page 36) states that it concurs with the findings of the archaeological assessment in the EIAR and supports the proposed mitigation measures assessment of the Proposed Scheme.

The NTA notes the recommendation set out in the DCC Report Appendix (page 46), from the Archaeology Section that the NTA appoint a Project Archaeologist to oversee the delivery of the archaeological strategy. In EIAR Volume 2 Main Chapters, Chapter 15 Archaeological and Cultural Heritage, Section 15.5.1.1, it states that:

“The NTA will procure the services of a suitably-qualified archaeologist as part of its Employer’s Representative team administering and monitoring the works.

The appointed contractor will make provision for archaeological monitoring to be carried out under licence to the DHLGH and the NMI, and will ensure the full recognition of, and the proper excavation and recording of, all archaeological soils, features, finds and deposits which may be disturbed below the ground surface.”

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

Conservation Assessment (Section 2.4.9)

This section summarises the observations set out in Section 2.4.9 (including reference to the Appendix) and NTA responses.

NTA acknowledges that DCC’s Conservation Department welcomes the comprehensive assessment on Architectural Heritage (EIAR Volume 2 Main Chapters, Chapter 16 Architectural Heritage and EIAR Volume 4 Appendices Part 2 of 2, Appendix 16. Architectural Heritage) submitted as part of the EIAR, and that DCC notes the comprehensive assessment of the impact of the Proposed Scheme on the architectural heritage, streetscape and urban environment generally and welcomes the proposed mitigation measures across the scheme. It is further noted that the department welcomes the Landscape - Townscape Visual Assessment documented in EIAR Volume 2 Main Chapters, Chapter 17 Landscape (Townscape) and Visual.

DCC states 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:

- DCC Development Plan 2016 – 2022 (Volume 1 – Chapter 11) – Policy CHC2; CHC3; CHC4; CHC7.

EIAR Volume 2 Main Chapters, Chapter 16 (Architectural Heritage) considers the relevant policies and provisions of the DCC Development Plan 2016-2022 and also the draft DCC Development Plan 2022-2028. These are listed in EIAR Volume 2 Main Chapters, Chapter 16 Architectural Heritage, Section 16.2.4. In terms of the specific policies a number of them are referenced in the EIAR as follows:

- CHC2 is referenced in EIAR Volume 2 Main Chapters, Chapter 16 Architectural Heritage, Section 16.3.1.3;
- CHC4 and CHC7 are referenced in EIAR Volume 2 Main Chapters, Chapter 16 Architectural Heritage, Section 16.3.1.4.

DCC state that the applicant should comply with the following guidelines:

- Architectural Heritage Protection Guidelines for Planning Authorities 2011;
- Paving – The conservation of historic ground surfaces.

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

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

DCC also states that the photomontages provided are limited and not to sufficiently assess the effects of the proposed route on views and visual amenities in specific locations, in particular through the historic inner-city area.

The NTA notes this point raised by DCC, however, it respectfully disagrees with the contention that the number of photomontages is limited and are not sufficient to assess the impacts of the Proposed Scheme. The NTA are satisfied that the photomontage views have been selected to show changes in the areas of the greatest/significant changes. In Chapter 17 (Section 17.5.2.1) of Volume 2 of the EIAR, it states that

'Photomontages have been prepared from key or illustrative viewpoints to give an indication of changes and potential effects resulting from the Proposed Scheme during the Operational Phase after the implementation of the scheme. The proposed views are shown with proposed planting at approximately 10 – 15 years post completion of the Construction Phase....'

The positions of all gantries / cantilevers are indicated in the Junction System Design drawings in Appendix B10 of the Preliminary Design Report provided in the Supplementary Information and shown on the photomontages where applicable – see Figure 17.2.14.2 (Cornmarket Junction) as an example.

The NTA notes that the Conservation department stated that some elements of architectural heritage have not been correctly labelled or have been incorrectly labelled in the documents and on the supporting mapping. These are addressed below:

- DCC notes that NIAH 50080372 is mistakenly assigned to Cherry Orchard Hospital but relates to Mount La Salle in Appendix A16.3 (Architectural Heritage Appendices).

The NTA notes that the building referred to in the Cherry Orchard Complex should be NIAH 50080472 rather than NIAH 50080372. This is not considered to be a material issue and there is no change to the impact assessment undertaken in Chapter 16 of the EIAR.

- DCC notes that St Matthew's Church is mistakenly labelled NIAH 5008036 but should be labelled NIAH 50080369.

The NTA notes this point. This is not considered to be a material issue and there is no change to the impact assessment undertaken in Chapter 16 of the EIAR.

- DCC notes that there is an incorrect reference to Cherry Orchard Hospital in Chapter 16 with it referred to as NIAH 50080371 rather than NIAH 5008367

The NTA notes this point. This is not considered to be a material issue and there is no change to the impact assessment undertaken in Chapter 16 of the EIAR

- DCC notes that the Statue of the Virgin Mary is referred to as CBC007BTH137 in Chapter 16 (Section 16.3) but incorrectly referred to as CBC0007CH001 in Chapter 15 (Section 15.3.3.6).

The references stated in the EIAR are correct. There are separate identifiers for the feature (for the Archaeological and Cultural Heritage Chapter and the Architectural Heritage chapter respectively).

- DCC states that not all sites recorded on the drawings are included in Appendix A16.2 (Inventory of Architectural Heritage Sites). DCC state that omissions include CBC007BTH014 and CBC007BTH015.

These sites are included in Appendix 16.2 in Section 7 - Other Structures of Interest and are considered within the assessment in Chapter 16 of the EIAR.

- DCC notes that four concrete lamp standards on Kylemore Road have not been identified in A16.2 (Inventory of Architectural Heritage Sites).

The NTA notes this point. However, there is comprehensive mitigation included in the EIAR to address potential impacts on lamp posts where they need to be repositioned. Mitigation consists of the recording, protection and monitoring prior to and during the Construction Phase. Recording, overseeing of protective measures and monitoring is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor and in accordance with the

methodology provided in Appendix A.16.3 in Volume 4 of the EIAR. As set out in Appendix 16.3 (*Methodology for Works Affecting Sensitive and Historic Fabric*):

“Lamp posts will be repaired and repositioned within the vicinity of its existing position, re-using all of the significant historic fabric and reinstating the fabric and function.

Where it is not possible to repair and reinstate the removed lamp posts, e.g. where the bases are in poor condition and not possible to salvage, the lamps will be replaced with replica historic lamps matching the existing material and detail of the historic lamps that they replace. Though this will constitute a loss of fabric, it is in line with the approach that has been taken by Local Authorities previously.”

It is envisaged that there will not be a significant residual architectural heritage impact.

- DCC notes that CBC005BTH032 is incorrectly labelled as CBC005BTH014 on Figure 16.1 and that two sites are indicated on Sheet 16 (CBC005BTH013) that are not shown in Chapter 16 or Appendix 16.2.

The NTA notes these points. CBC0007BTH032 is labelled in Figure 16.1 as CBC006BTH014. This is not considered to be a material issue and there is no change to the impact assessment undertaken in Chapter 16 of the EIAR.

CBC006BTH013 is labelled twice on Sheet 16 of Figure 16.1 both of which relate to the railway at Con Colbert Road, St John’s West (Industrial Heritage Site). This industrial heritage site is of Regional and Medium sensitivity which will not be directly impacted by the Proposed Scheme.

- DCC notes that CBC007BTH164, CBC007BTH168 and CBC007BTH169 are not displayed on in Figure 16.1

The NTA notes these points. These are captured in Section 16.5.1.7.4 of Chapter 16 in Volume 2 of the EIAR. No works are proposed to these features. Recording, overseeing of protective measures and monitoring is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor and in accordance with the methodology provided in Appendix A.16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of the EIAR. The predicted residual Construction Phase impact is Indirect, Negative, Not Significant and Temporary.

- DCC notes that CBC007BTH169 is included within CBC007BTH140 within Figure 16.1

The NTA notes this point. This is due to CBC007BTH169 and CBC007BTH140 adjoining on Emmet Road – the granite kerb stones along CBC007BTH169 and CBC007BTH140 have been assessed within the assessments in the EIAR.

The NTA acknowledge the comments raised by the Conservation Section and are satisfied that they are addressed as set out in the EIAR as follows.

Protected Structures and their Setting

The NTA notes that DCC made specific reference to a number of protected structures:

- a) DCC notes that the protected gate piers of the former De La Salle National School (DCC RPS 8784), matching pedestrian gate piers and boundary wall may be impacted by land acquisition associated with the Proposed Scheme. This is assessed in Section 16.4.3.5 of Chapter 16 and mitigation measures are set out in Section 16.5.1.1.

Works to historic fabric will be carried out in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR. At this location mitigation proposed at the gate piers applies to the pedestrian gate and will include recording the historic details and finishes, investigative / opening up works prior to being taken down, labelling the affected railings, gates, gate posts prior to their careful removal to safe storage, and their reinstatement on new lines

Recording, overseeing of protective measures and monitoring is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor in accordance

with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR.

- b) DCC notes that a number of trees will be removed at De La Salle National School (DCC RPS 8784) as part of the Proposed Scheme.

The Proposed Scheme has also sought to retain existing trees where possible. As referred in DCC's submission, compensatory tree planting will take place in the grounds of De La Salle National School (DCC RPS 8784).

As noted in Chapter 17 of the EIAR, it is proposed to reinstate / provide new street planting along Ballyfermot Road to replace removed trees including provision of setback boundary and adequate replacement tree planting and reinstatement works at the former De La Salle National School and the former Mount La Salle Monastery. Furthermore, planting to SuDS area in area of the former De La Salle National School is proposed.

As set out in Chapter 16 (Table 16.16) with mitigation, it is anticipated that the residual impact will be Negative, Slight, Temporary.

- c) DCC note that the cobbles in front of Cleary's Licenced premises (DCC RPS 74754) should be protected.

As set out in the Landscape General Arrangement drawings in Volume 3, Chapter 4 Section 5 of the EIAR it is proposed to retain the existing surfacing at this location.

The NTA recognises that no works are proposed to the kerbs and cobbles features but there is potential for damage of these features during construction and sets out mitigation in Chapter 16 of the EIAR. Mitigation consists of the retention of the various kerb stones, cellar hatches and cellar lights in-situ, and their integration into the proposed new paving design. Additional mitigation will be to record, protect and monitor the kerb stones, cellar hatches and cellar lights for the duration of the Construction Phase. Recording, overseeing of protective measures and monitoring is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor and in accordance with the methodology provided in Appendix A.16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of the EIAR.

- d) DCC notes that the removal of the bus stop on Grattan Crescent, Inchicore National School (DCC RPS 7476) will have a positive impact on the setting of the protected structure.

The NTA note this statement. A stand-alone document (Bus Stop Review Methodology) has also been developed and is included as an appendix (Appendix H) to the Preliminary Design Report. This states that it is proposed to remove existing bus stops on Grattan Crescent.

- e) DCC makes a number of comments regarding bus stops / shelters and protected structures.

The installation of bus shelters has been considered in the architectural assessment in Chapter 16. A comprehensive review of existing bus stops along the route of the Proposed Scheme has been carried out and is documented in Appendix H of the Preliminary Design Report contained in the Supplementary Information. Refer to Chapter 4 in Volume 2 of the EIAR (Section 4.5) of the location of bus stops.

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

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

Furthermore, Appendix H of the PDR includes detail of design of Bus Stops and Shelters. The optimum configuration that provides maximum comfort and protection from the elements to the travelling public is the 3-Bay Reliance 'mark' configuration with full width roof. This shelter is a relatively new arrangement which has been developed by JCDecaux in conjunction with the NTA. The shelter consists mainly of a stainless-steel structure with toughened safety glass and extruded aluminium roof beams. Appendix H states:

“The BusConnects Design Guide suggests that an Island Bus Stop (Figure 34) is the preferred bus stop option to be used as standard on the CBC project where space constraints allow. The minimum footpath width within which an island bus stop can be implemented is 5.4m (1.8m footpath + 1.2m cycle track + 2.4m island with shelter). This option assumes a shelter with half bay end panels. Should full panels (as seen on Figure 2.8) be required the width requirement will increase to approximately 6.3m.”



Figure 2.8 Standard 3 Bay Reliance Mark Shelter with full width advertising panel

For locations where space is constrained an option consisting of a shared bus stop landing zone can be considered. This option is indicated in Figure 2.9 and should only be considered on a case-by case basis to ensure suitability with particular attention paid to the volume of cyclists and volumes of boarding and alighting passengers. Using the narrowest non-standard bus shelter this would require a minimum width of approximately 4.0m (1.9m footpath with shelter + 1.2m cycle track + 0.75m island).



Figure 2.9 Example of a 3-Bay Reliance Cantilever shelter with a narrow roof configuration with and without half end panels.

- f) DCC notes that all Protected Structures in close proximity to construction works should be supervised by a conservation professional.

Chapter 16 Architectural Heritage, Section 16.5.1.1 of the EIAR sets out the proposed mitigation measures during the construction phase:

“Recording, overseeing of protective measures and monitoring is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric”

- g) DCC notes that there are a number of additional structures on the Record of Protected Structures maps including St Patricks Hospital (DCC RPS 856), St Catherine’s Church (DCC RPS 8153), Guinness Power Station (DCC RPS 8786), Church of St Augustine and St John (DCC RPS 8174), City Wall at Lamb Alley (DCC RPS 4276), St Audeon’s Church of Ireland Church (DCC RPS 3821), St Audeon’s Roman Catholic Church (DCC RPS 3822 and Taylor’s Hall (DCC RPS322).

The potential impact is noted in Section 16.4.3.1 of the EIAR chapter and mitigation under Section 16. 5.1.1 was prescribed as follows:

“Nine Protected Structures of National Importance and High Sensitivity were identified in the study area which have boundaries along the Proposed Scheme. They are identified in Appendix A16.2 Inventory of Architectural Heritage Sites in Volume 4 of this EIAR. There is potential for damage of sensitive fabric during construction. The potential pre-mitigation Construction Phase impact is Indirect, Negative, Significant and Temporary. Mitigation to offset the risk of damage will include recording, protection and monitoring of the adjoining structures or boundaries prior to, and for the duration of the Construction Phase. Recording, overseeing of protective measures and monitoring is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR.”

Buildings and other non-Protected Structures

The NTA notes that DCC made specific reference to a number of locations under this heading:

- a) DCC considers that the proposed bus shelter, associated land take and cantilever signal pole at Cherry Orchard Hospital on the Ballyfermot Road will negatively impact the setting of the NIAH 'Regionally' rated structures.

As set out in EIAR Chapter 16 Section 16.4.4.4:

A bus shelter is proposed at Cherry Orchard Hospital (NIAH 50080367). There is no shelter in this location currently though there is a fingerpost bus stop to the east. It is not anticipated that the shelter will impact on the setting of the adjoining hospital as it will be screened by existing or reinstated hedging. The Hospital is of Regional importance and Medium sensitivity. The Magnitude of impact will be Negligible. The potential Operational Phase impact is Indirect, Negative, Not Significant and Long-Term.

There is a proposed cantilever on Ballyfermot Road located opposite Cherry Orchard Hospital (NIAH 50080371). There is no cantilever in this location currently. The buildings are of Regional importance and Medium Sensitivity. The Magnitude of impact will be Low. The potential Operational Phase impact is Indirect, Negative, Slight and Long-Term.

- b) DCC notes the limited impact to the 'Regionally' rated post box on Ballyfermot Road (NIAH 50080457)

The post box on Ballyfermot Road (NIAH 50080457) will not be directly impacted as part of the Proposed Scheme.

The NTA recognises the importance of protecting post boxes during construction. Their locations are shown on the EIAR Volume 3 – Figures, Chapter 16 Architectural Heritage Figure 16.1 as well as being listed in Chapter 16 Architectural Heritage Table 16.13.

Chapter 16 Architectural Heritage Section 16.5.1.4.1 sets out the mitigation for recording, protection and monitoring prior to and during the Construction Phase. Recording is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor and in accordance with the methodology provided in Volume 4 Appendices Part 2 of 2, Appendices A16.1-A16.3 Architectural Heritage, Appendix A16.3.

- c) DCC note potential negative impacts to the setting of the church (NIAH 50080368) and wider hospital complex (NIAH 50080367) due to the proposed land acquisition associated with the relocated bus stop.

EIAR Chapter 16 sets out the potential implication of the bus stop at this location:

'It is not anticipated that the shelter will impact on the setting of the adjoining hospital as it will be screened by existing or reinstated hedging'.

The Proposed Scheme will reinstate the hedging as shown on the Landscape General Arrangement drawings. The reinstated hedging will screen the Hospital, Chapel and wider hospital complex. The predicted Operational Phase impact is Indirect, Negative, Not Significant and Long-Term.

- d) DCC note that temporary land acquisition is proposed to the north Mortuary Cherry Orchard Hospital (NIAH 50080472).

As set out in EIAR Appendix A16.3, in designing the Proposed Scheme, the Engineers have sought to avoid direct impact on historic boundary treatments where possible through a range of alternative engineering and design solutions including the use of bus gates, avoiding, or relocating land takes to less sensitive locations and minimizing changes to the Proposed Scheme alignment to avoid direct or indirect impacts to architectural heritage features which are located along the Proposed Scheme. There are locations where an impact has been unavoidable however.

The boundary wall to the north of the Mortuary Cherry Orchard Hospital (NIAH 50080472) is a 20th century wall and railings. It will be reinstated to match the existing as it is a consistent boundary treatment.

- e) DCC notes that there is limited impact to Saint Matthew's Church Ballyfermot (NIAH 50080369).

No works are proposed to Saint Matthew's Church Ballyfermot (NIAH 50080369). The Church is largely obscured by existing trees within its grounds. The footpath to the north is to be repaved with concrete paving.

- f) DCC notes the limited impact to the 'Regionally' rated post box on Le Fanu Road (NIAH 50080458)

The post box on Le Fanu Road (NIAH 50080458) is outside of the site boundary line and will not be directly impacted as part of the Proposed Scheme.

The NTA recognises the importance of protecting post boxes during construction. Their locations are shown on the EIAR Volume 3 – Figures, Chapter 16 Architectural Heritage Figure 16.1 as well as being listed in Chapter 16 Architectural Heritage Table 16.13.

Chapter 16 Architectural Heritage Section 16.5.1.4.1 sets out the mitigation for recording, protection and monitoring prior to and during the Construction Phase. Recording is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor and in accordance with the methodology provided in Volume 4 Appendices Part 2 of 2, Appendices A16.1-A16.3 Architectural Heritage, Appendix A16.3.

- g) DCC notes the upgrade of the roundabout at Ballyfermot / Kylemore Road to a signalised junction and recommends that the proposal is reconsidered.

This junction has been designed through various rounds of iterative design and engagement. As set out in EIAR Appendix A6.3, the four-arm roundabout will be modified to become a traffic signal junction including full pedestrian, cycle and bus infrastructure to optimise pedestrian, cyclists and bus priority infrastructure on the scheme in line with the scheme objectives.

Regarding the proposed conversion of the roundabout at the Junction of Kylemore Road and Ballyfermot Road to a signalised junction, the existing junction is dominated by hard landscaping and car parking that detracts from the Church of Our Lady of the Assumption (NIAH 50080370). The proposed landscape drawings indicate an increase in planting and a softened landscaping treatment immediately adjoining the church and elsewhere on the junction which will complement the setting of the church. The NTA acknowledges DCC's observation regarding semaphores and signage and will keep them to a minimum. Similarly, the granite boundary markers at the junction will be reinstated. The statue of Our Lady (CBC0007BTH137) will be located in the area of paving in front of the Church.

- h) DCC notes the limited impact to the 'Regionally' rated post box outside Ballyfermot Resource Centre (NIAH 50080371)

It is proposed to relocate the post box outside Ballyfermot Resource Centre (NIAH 50080371) as part of the Proposed Scheme.

As set out in Chapter 16 Architectural Heritage:

Where removal or relocation is required, the component parts of the post boxes will be recorded and labelled before removal takes place. The post boxes are to be carefully removed by an experienced contractor...

Post boxes will be repositioned within the vicinity of this previous or original position (not more than 20m away and on the same side of the road where possible), re-using all of the significant historic fabric and reinstating the fabric and function. It will be set back further from the traffic lanes where possible reducing the risk of accidental damage from passing vehicles.

The NTA recognises the importance of protecting post boxes during construction.

Chapter 16 Architectural Heritage Section 16.5.1.4.1 sets out the mitigation for recording, protection and monitoring prior to and during the Construction Phase. Recording is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor and in accordance with the methodology provided in Volume 4 Appendices Part 2 of 2, Appendices A16.1-A16.3 Architectural Heritage, Appendix A16.3.

- i) DCC notes that land acquisition is proposed along the northern side of Ballyfermot Road. DCC recommend that the gate piers and decorative gates to Mount La Salle (NIAH 50080372) are recorded, carefully taken down and reinstated on completion of the work.

As stated in Section 16.5.1.4 of the Chapter 16 of the EIAR:

The existing boundary treatment and entrance gate piers to Mount La Salle, Ballyfermot Road (NIAH 50080372) will be repositioned as a result of a land take to accommodate a new bus lane and cycle lane. The potential premitigation Construction Phase impact is Direct, Negative, Slight and Permanent. Mitigation consists of recording the of the entrance piers and investigative / opening up works to determine the construction before being taken down, labelling the affected railings, gates, gate posts, prior to their careful removal to safe storage, and their reinstatement on new lines, which faithfully reinstate the existing details, and the relationships between the entrances and the historic buildings. Recording is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor. The architectural heritage specialist will oversee any opening up works, labelling, taking-down and reinstatement of the affected gates, railings, piers and plinths. Works to historic fabric will be carried out in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR. With mitigation, the impact magnitude is reduced from Medium to Low. The predicted residual impact is Direct, Negative, Not Significant and Temporary.

- j) DCC notes that a number of trees will be removed at De La Salle National School ((NIAH 50080372) as part of the Proposed Scheme.

The Proposed Scheme has also sought to retain existing trees where possible. As noted in Chapter 17 of the EIAR, it is proposed to reinstate / provide new street planting along Ballyfermot Road to replace removed trees including provision of setback boundary and adequate replacement tree planting and reinstatement works at the former De La Salle National School and the former Mount La Salle Monastery. Furthermore, planting to SuDS area in area of the former De La Salle National School is proposed.

As set out in Chapter 16 (Table 16.16) with mitigation, it is anticipated that the residual impact will be Negative, Slight, Temporary.

- k) DCC notes the limited impact to the 'Regionally' rated post box on Emmet Road (NIAH 50080384)

The post box on Emmet Road (NIAH 50080384) will not be directly impacted as part of the Proposed Scheme.

The NTA recognises the importance of protecting post boxes during construction. Their locations are shown on the EIAR Volume 3 – Figures, Chapter 16 Architectural Heritage Figure 16.1 as well as being listed in Chapter 16 Architectural Heritage Table 16.13.

Chapter 16 Architectural Heritage Section 16.5.1.4.1 sets out the mitigation for recording, protection and monitoring prior to and during the Construction Phase. Recording is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor and in accordance with the methodology provided in Volume 4 Appendices Part 2 of 2, Appendices A16.1-A16.3 Architectural Heritage, Appendix A16.3.

- l) DCC makes a number of comments regarding bus stops / shelters and NIAH Structures.

This comment is addressed as part of NTA's response to in the *Protected Structures and their Setting* section.

Any impacts to NIAH Structures are documented in Chapter 16 of the EIAR (Section 16.4.4).

- m) DCC notes amendments to the Guinness Brewery (NIAH 50080315, 50080316, 50080275) and Guinness Turbine House (50080324).

As indicated in the landscaping drawings, the existing paving will be retained in these locations and no alterations to the entrances are proposed.

- n) DCC notes a number of additional sites recorded by the NIAH on subject map sheets stating that there are no direct adverse impacts apparent and expressing concern regarding any indirect impacts.

Chapter 16 of the EIAR (Section 16.5.1.4) identifies mitigation for indirect impacts to NIAH structures during construction stating:

Mitigation to offset the risk of damage will include recording, protection and monitoring of these structures or boundaries prior to, and for the duration of the Construction Phase. Recording, overseeing of protective measures and monitoring is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR, reducing the magnitude of the impact from Medium to Negligible. The predicted residual Construction Phase Impact is Indirect, Negative, Imperceptible and Temporary.

Structures on the Dublin City Industrial Heritage Record Survey (DCIHR)

- DCC's submission notes that the proposed Scheme passes under railway bridge at Sarsfield Road and that there is potential for damage to the abutment walls (DCIHR 180900201).

The NTA notes the comments from DCC in this regard. The presence of this DCIHR site was identified and noted in the EIAR (Chapter 16, Table 16.10) as well as displayed in Figure 16.1 in Volume 3 of the EIAR (ID CBC0007BTH023). The structure, though not officially designated, has been assessed using the assessment methodology contained in the NIAH Handbook (NIAH 2017) and is of Local importance and Low Sensitivity.

- DCC notes that the deck of the railway bridge carrying Memorial Road (DCIHR 181000201) has been widened.

This bridge (DCIHR 181000201) is identified in Chapter 16 of the EIAR (ID CBC0007BTH032). Any necessary mitigation for the protection of industrial heritage features is included in section 16.5.1.6 of the EIAR which states:

Mitigation to offset the risk of damage will include recording, protection and monitoring of the structures or boundaries prior to, and for the duration of the Construction Phase. Recording, overseeing of protective measures and monitoring is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR, reducing the magnitude of the impact from Medium to Negligible. The predicted residual Construction Phase Impact is Indirect, Negative, Imperceptible and Temporary.

- DCC notes Proposed Scheme crosses two bridges on Emmet Road (DCIHR 1810036 and DCIHR 1810037) and the potential remains of tramways.

Chapter 15 of the EIAR notes that nothing survives above ground of the bridge at Emmet Road that once crossed the mill race fed by the River Camac, the former tramway line that ran from Emmet Road to High Street (from Chainage B5720 to B9000), and the Glib Market and Corn Market House that once stood on Thomas Street. Chapter 15 of the EIAR notes that:

Licensed archaeological excavation, in full or in part, of any identified archaeological remains (preservation by record) or preservation in situ will be undertaken.

Golden Bridge on Emmet Road (DCIHR 181003701) is also recorded in the NIAH survey (NIAH 50080383) with both IDs stated in the appendix. Mitigation for indirect impacts to NIAH structures, where front on the Proposed Scheme and where there is potential for damage during construction is addressed in Section 16.5.1.4 of the EIAR.

- DCC notes that the deck of the bridge on South Circular Road (DCIHR 181033) has been widened.

Kilmainham Bridge (DCIHR 181003301), located on the South Circular Road, is referenced in Chapter 16 of the EIAR under its highest designation which is a recorded monument (RMP DU018020289). The NIAH identifier (NIAH 50080059) and DCIHR ID (181003301) are also provided in Appendix A16.2. As part of the Proposed Scheme (as shown in the Pavement

Treatment Plans drawings in Volume 3, Chapter 4 Section 6 of the EIAR) no works are proposed to Kilmainham Bridge.

Other unprotected structures that contribute positively to the architectural heritage and streetscape character

- DCC notes note that the railings at Ballyfermot Community Centre on Ballyfermot Road and at the park at the junction with Blackditch Road are retained and recommends that railings are retained in situ with careful mitigation.

Chapter 16 of the EIAR (Section 16.5.1.6) sets out the mitigation proposed at this location:

Mitigation consists of recording of the boundary plinth and railings before the boundary railings are taken down, labelling the affected railings, prior to their careful removal to safe storage, and their reinstatement on new lines, which faithfully reinstate the existing details, and the relationships between the entrances and the historic buildings. Recording is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor. The architectural heritage specialist will oversee any opening up works, labelling, taking-down and reinstatement of the affected railings and plinths. If possible, the materials are to be retained for reuse. The boundary is to be rebuilt like for like. Works to historic fabric will be carried out in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR. With mitigation, the impact magnitude is reduced from Medium to Low. The predicted residual impact is Direct, Negative, Not Significant and Temporary

- DCC notes that any mitigation measures should ensure that where original / historical gates survive, new gates should be facsimile's of the originals.

The NTA notes these comments. Section 13.5 of the Preliminary Design Report of the Supplementary Information states the following:

“To maintain the character and setting of the Proposed Scheme, the approach to undertaking the new boundary treatment works along the corridor is replacement on a ‘like for like’ basis in terms of material selection and general aesthetics, unless otherwise noted on the drawings. Final details of boundary walls, gates, driveways, and grassed areas where affected, will be agreed between the directly impacted landowners and the NTA. Final details of boundary walls, gates and driveways will be agreed between the affected landowners and NTA during the accommodation works negotiations.”

Proposed boundary modifications have been assessed as part of the Architectural Heritage assessment outlined in Chapter 16 in Volume 2 of the EIAR, with appropriate mitigation measures outlined where necessary.

- DCC requests clarification of the position of the relocated statue of Mary, currently located on Ballyfermot / Kylemore Road roundabout.

The proposed location is displayed in EIAR Volume 3 Chapter 4 Proposed Scheme Description Figures, General Arrangement drawings (Sheet 13). The NTA acknowledges the engagement with relevant stakeholders that has been in place during the planning and design stage of the Proposed Scheme, including DCC.

It is the intention of the NTA that this collaboration will continue both in advance of, and during, the subsequent construction stage of the Proposed Scheme.

- DCC note that land acquisition as part of the Proposed Scheme will impact on the boundary of St Raphael's, St Gabriel's, and St Michael's Schools on the Ballyfermot Road (CBC0007BTH008) and request that mitigation is in place. DCC also note the tree removal in this location and the short term impacts.

Mitigation for the reinstatement of the boundary to St Raphael's, St Gabriel's, and St Michael's Schools on the Ballyfermot Road (CBC0007BTH008) is stated in Chapter 16 of the EIAR (Section 16.5.1.6):

Mitigation consists of recording of the boundary plinth and railings before the boundary railings are taken down, labelling the affected railings, prior to their careful removal to safe storage, and their reinstatement on new lines, which faithfully reinstate the existing details, and the relationships between the entrances and the historic buildings. Recording is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor. The architectural heritage specialist will oversee any opening up works, labelling, taking-down and reinstatement of the affected railings and plinths. If possible, the materials are to be retained for reuse. The boundary is to be rebuilt like for like. Works to historic fabric will be carried out in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR. With mitigation, the impact magnitude is reduced from Medium to Low. The predicted residual impact is Direct, Negative, Not Significant and Temporary.

The Proposed Scheme has sought to retain existing trees where possible. As outlined in Chapter 17 of the EIAR, an enhanced urban realm scheme is proposed at the new Ballyfermot Road / Kylemore Road junction, with an appropriate setting for the Statue of Virgin Mary and associated plinth, and with new tree planting / urban realm scheme including play facilities, ornamental planting and seating areas. Furthermore, it is proposed to reinstate / provide new street planting along Ballyfermot Road to replace removed trees including the provision of setback boundary and adequate replacement tree planting and reinstatement works at St. Gabriel's National School, Ballyfermot Family Resource Centre, the former De La Salle National School, the former Mount La Salle Monastery.

- DCC note that land acquisition will impact on the boundary railings and associated plinth wall to Markiewicz Park (CBC0007BTH154) and recommend that the maximum amount of historic fabric is retained. DCC also state that the gates and railings are to be protected during the construction phase.

Chapter 16 of the EIAR (Section 16.5.1.5) states:

A section of the boundary railings to Markiewicz Park (CBC0007BTH154) on Ballyfermot Road, specifically at the east end will be repositioned as a result of a land take to accommodate a new bus lane and cycle lane. The entrance gates and piers to the park will remain untouched....

Mitigation consists of careful recording before the boundary railings are taken down. Recording is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor. The architectural heritage specialist will oversee any opening up works, labelling, taking-down and reinstatement of the affected railings and plinths. If possible, the materials are to be retained for reuse. The boundary is to be rebuilt like for like. Works to historic fabric will be carried out in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR. This will reduce the Magnitude of the impact to Negligible. The predicted residual Construction Phase Impact is Direct, Negative, Imperceptible, Temporary.

- DCC notes that the former boundary wall of Mount Vernon House is to be protected and that construction works should be supervised by a conservation professional.

Chapter 16 (Table 16.9) of the EIAR recognises Mount Vernon House as a designed landscape. As above, the boundary wall to Mount Vernon House will similarly be protected during the course of works to prevent damage from construction works along the adjoining Sarsfield Road.

Architectural Conservation Areas (ACAs) and Conservation Areas

- DCC states that the eastern end of the Proposed Scheme will run through Thomas Street and Environs ACA and the changes to the public realm, particularly the bus shelters, will change the character of the ACA.

Chapter 16 (Architectural Heritage) of the EIAR sets out the ACAs and objectives for ACAs within the Proposed Scheme Study Area, this includes Thomas Street ACA (Section 16.3.1.4.1). Section 16.4.4.2 of Chapter 16 notes:

Two bus shelters are proposed within the Thomas Street ACA, the shelters at 30 Thomas Street and 120 Thomas Street. The ACA contains structures of National importance and High Sensitivity. The Magnitude of impact will be Low. The potential Operational Phase impact on the ACA is Negative, Slight and Long-Term.

The overall predicted Operational Phase Impacts of the Proposed Scheme are summarised in Table 16.15 of the EIAR which identifies the Thomas Street ACA as of National importance and High Sensitivity and predicts an Indirect, Negative, Slight, Long-Term Impact.

- DCC notes that the additional signage, street furniture, proposed bus stops / shelters and changes to the urban realm may impact the character of historic urban streetscapes. DCC advises that the Proposed Scheme considers the historic streetscapes and Conservation Areas.

Chapter 16 (Architectural Heritage) of the EIAR recognises that Conservation Area (CA) which are indicated in the Dublin City Development Plan 2016-2022 (DCC 2016) and Draft Dublin City Development Plan 2022 - 2028 (DCC 2021) as red hatched areas or may be protected under specific objectives for the protection of streetscapes, street furniture, paving treatments and industrial heritage. Red hatched Conservation Areas are addressed in Section 16.3.1.5 of the EIAR.

Seven Conservation Areas were identified in the study area as indicated in Section 16.3.1.5 and described in Appendix A16.2 Inventory of Architectural Heritage Sites in Volume 4 of the EIAR.

Signage and proposed urban realm works have been kept to a minimum to reduce potential direct and indirect negative impacts.

Potential Impact on historic paving and kerbing, historic street furniture and lamp standards and other features

In regard to Historic Paving and kerbing, historic street furniture and lamp standards and other features, NTA recognises the importance of protecting historic street surfaces, street furniture and other historical features and note that mitigation measures have been considered in the EIAR, Volume 2 - Main Chapters, Chapter 16 Architectural Heritage Section 16.5.1 as set out below: "Proposed mitigation measures for architectural heritage features are outlined below and detailed in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR. The methodology has been prepared in accordance with the Architectural Heritage Protection: Guidelines for Planning Authorities (DEHLG 2011) and Paving: the conservation of historic ground surfaces (McLoughlin 2017)"

- DCC notes that some concrete lamp posts have not been identified within the EIAR and recommends that these are retained in situ with the protective measures identified within the EIAR (Section 16.5.1.7.2) extended to include these features.

The NTA notes these comments. Historic lamp posts which are retained in situ will be protected during the construction phase as per the methodology set out in Section 1.4 of Appendix A16.3 in Volume 4 of the EIAR:

"The Proposed Scheme engineers have made every effort to retain heritage lamp posts and lamp standards in situ. In most cases, they will not be directly affected by the proposed scheme. Where they are to be retained in situ, protection during works will be necessary. The use of protective covers, wrappings, or padding, through cordoning off or boxing off as recommended by the Department's Guidelines (DAHG 2011, 14.4.4). In situ cleaning, repairs and painting will be carried out as necessary."

- DCC notes that James' Street, Thomas Street, John Street West and High Street are listed in Appendix 8 of the Dublin City Development Plan and have granite kerbing.

As set out in the Landscape General Arrangement drawings in Volume 3, Chapter 4 Section 5 of the EIAR it is proposed to retain the existing surfacing for much of Thomas Street / James Street between Bow Lane West and St Augustine Street.

The NTA recognises that no works are proposed to the majority of kerbs and cobbles features but there is potential for damage of these features during construction and sets out mitigation in Chapter 16 of the EIAR. Mitigation consists of the retention of the various kerb stones, cellar

hatches and cellar lights in-situ, and their integration into the proposed new paving design. Additional mitigation will be to record, protect and monitor the kerb stones, cellar hatches and cellar lights for the duration of the Construction Phase. Recording, overseeing of protective measures and monitoring is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor and in accordance with the methodology provided in Appendix A.16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of the EIAR.

At the Cornmarket junction high quality public realm improvements are proposed. High quality granite paving with wide granite kerbs and a coordinated banding feature to visually tie both sides of the junction together are proposed. The outline of the historic city wall will be interpreted through a granite band on either side of the road.

- DCC queries the impact to the historic kerbstones at the entrance to Woodfield Cottages from Sarsfield Road.

EIAR Volume 2 Chapter 17, Landscape (Townscape) & Visual, documents the potential landscape (townscape) and visual impacts associated with the Construction and Operational Phases of the Proposed Scheme. The paving proposals are presented in the EIAR Volume 3 Chapter 4, Proposed Scheme Description 5. Landscaping General Arrangements.

It is proposed to retain the existing surface along the majority of Sarsfield Road (Woodfield Terrace) and Inchicore Road. At the junction of Sarsfield Road (Woodfield Terrace) / Inchicore Road / Grattan Crescent it is proposed to use poured concrete. At this location, the existing granite kerbs between properties 1-5 (which form part of the junction redesign) are proposed to be incorporated into the design, where practicable.

Mitigation has been prescribed for paving and other historic surface treatments which are not directly impacted by the proposed scheme and is outlined in Section 16.5.1.7.4.

- DCC notes the early twentieth-century control box on Grattan Crescent.

This is noted within Chapter 16 of the EIAR (Table 16.13) as being of Regional importance and Medium sensitivity. As per Section 16.5.1.7.3 of the EIAR:

Mitigation consists of the recording, protection and monitoring prior to and during the Construction Phase. Recording, overseeing of protective measures and monitoring is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor and in accordance with the methodology provided in Appendix A.16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of the EIAR, reducing the magnitude of the risk from Medium to Low. The predicted residual Construction Phase impact is Indirect, Negative, Slight and Temporary.

- DCC notes that the removal of trees will have a significant impact on the architectural character and setting of historic structures, both protected and unprotected, and streetscapes.

The NTA notes this comment. Significant efforts have been made to minimise tree removal where practicable.

- DCC notes that where works require removal of existing roadside boundary walls, railings, entrance gates and hedgerows, together with areas of existing garden plantings, garden trees, paving etc, boundary walls, railings, entrance gates and hedgerows to match existing should be reinstated at the setback location, pending agreement on more detailed design with the Planning Authority's Conservation Section and having regard to the provisions of the Architectural Protection Guidelines for Planning Authorities (2011) and the relevant DHLGH Advice Series publications.

The NTA notes this comment. Section 4.6.18.1 Chapter 4 of the EIAR notes the following:

There are a number of areas along the extents of the route where the Proposed Scheme will result in the requirement for accommodation works and boundary treatments. Specific accommodation works are considered on a case-by-case basis.

To maintain the character and setting of the Proposed Scheme, the approach to undertaking the new boundary treatment works along the corridor is replacement on a 'like for like' basis in terms of material selection and general aesthetics, unless a section of street can benefit from urban improvement appropriate to the area.

Section 13.4 of the Preliminary Design Report of the Supplementary Information notes the following:

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

Final details of boundary walls, gates, driveways and grassed areas where affected, will be agreed between the directly impacted landowners and the NTA.

Proposed boundary modifications have been assessed as part of the Architectural Heritage assessment outlined in Chapter 16 in Volume 2 of the EIAR, with appropriate mitigation measures outlined where necessary.

- DCC notes that coloured tarmacadam to cycle lanes will alter the physical and visual character of the existing streetscape to include Ballyfermot Road, lined with Protected Structures - De La Salle National School.

The NTA note this comment. Section 5.5 of the BusConnects Preliminary Design Guidance Booklet, included in Appendix O of the Preliminary Design Report in the Supplementary Information states the following in relation to the proposed cycle track material:

"As illustrated in Figure 8, the use of machine laid asphalt for the cycle track has proven to be an effective way of providing a high level of service with a safe, smooth and continuous surface. This, however, offers very little contrast to the adjacent carriageway, and depends on the type of edge kerb and the presence of road markings to offer a visual differentiation between the carriageway and the cycle track. Consideration should be given to including an additional colour contrast to the cycle track in the form of an alternative-coloured asphalt (e.g. red, buff, etc) or adding coloured chips to the asphalt surface during installation (e.g. red chip). Designers should refer to section 5.6 of the NCM for further guidance on appropriate cycle track materials.

At junctions, the chosen cycle track material should be continued (as a surface course layer) through the junction for consistency. Alternatively, coloured epoxy resin (cold-applied anti-skid layer) is a robust alternative measure in terms of longevity and maintenance for making cycle lanes more conspicuous at junctions."

- DCC noted that the Conservation Section request that where cycleways are located in close proximity to Protected Structures and within Architectural Conservation areas generally, that an alternative high quality cycle lane surface is provided in-lieu of red tarmacadam.

The NTA notes this comment. As outlined above, the use of red coloured asphalt, or red coloured epoxy resin has been specified for all cycle tracks across the BusConnects Infrastructure Works to ensure legibility and conspicuity of the proposed cycle tracks and to ensure safety for vulnerable road users.

- DCC notes that careful consideration should be given to the siting of associated utilities and traffic management signage in relation to Protected Structures and Conservation Area, historic paving and historic street furniture. DCC noted that signage should be kept to the necessary minimum. DCC's conservation section recommended that consideration is given to the rationalisation of all signage across the BusConnects routes to reduce visual clutter.

The NTA notes this comment. Significant efforts have been made during the design process to minimise above-ground utility infrastructure where practicable. Where such infrastructure is necessary, it has been sited in appropriate locations, and rationalised where practicable.

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

throughout the design development process. NTA will however continue the very positive and constructive liaison with DCC throughout the procurement and construction process.

City Architects Department Comments (Section 2.4.10)

This section summarises the observations set out in Section 2.4.10 (including reference to the Appendix) and NTA responses.

On page 51 of the DCC submission, the City Architects Department welcomed 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. It went on to state that 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. This Department also noted that proposals for public realm upgrades, including widened footpaths, high quality hard and soft landscaping contribute towards a safer, more attractive environment for pedestrians are included, and that the Proposed Scheme has been developed having regard to relevant accessibility guidance and universal design principles so as to provide access for all users.

The City Architects Department goes on to provide commentary on a number of specific elements, as listed below:

Local Public Realm Improvement Schemes

DCC noted that the Proposed Scheme includes images of proposed public realm improvements at the following locations:

- Ballyfermot Retail Centre
- O'Hogan Road
- Grattan Crescent
- Emmet Road Village Centre
- The 'Obelisk fountain area' at the junction of James's Street and Bow Lane West
- Cornmarket at the junction of High Street, Bridge Street Upper and Thomas Street.

DCC noted that limited information is provided to facilitate proper assessment of the proposals. In addition, DCC noted that there is potential for the delivery of an enhanced public realm along Thomas Street on both the north and south sides of the street.

The NTA notes this comment. EIAR Volume 2 Main Chapters, Chapter 4 Proposed Scheme Description, Section 4.6.12 outlines detail in relation to the proposed Landscape and Urban Realm Design, including at the specific locations referenced by DCC above (note that for the other geographic sections, similar descriptions are also provided in EIAR Volume 2 Chapter 4 Proposed Scheme Description. Reference should also be made to the Landscaping General Arrangement drawings in EIAR Volume 3 Figures. In addition, the key landscape measures proposed in each geographic section is set out in EIAR Volume 2 Main Chapters, Chapter 17 Landscape (Townscape) and Visual, Section 17.4.

In regard to public realm opportunities at Thomas Street, the aim of the Proposed Scheme is to provide enhanced walking, cycling and bus infrastructure on this key access corridor in the Dublin region, which will enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor. Furthermore, it is an objective of the Proposed Scheme to ensure that the public realm is carefully considered in the design and development of the transport infrastructure and seek to enhance key urban focal points where appropriate and feasible.

As set out in EIAR Volume 2 Main Chapters, Chapter 4 Proposed Scheme Description, the landscape and urban realm proposals are derived from analysis of the existing urban realm which allowed the designers to consider appropriate enhancement opportunities along the route. The enhancement opportunities include key nodal locations which focus on locally upgrading the quality of the paving materials, extending planting, decluttering of streetscape and general placemaking along the route.

Along the route there will be a number of enhancements to specific urban realm hot spots where there is a clear opportunity to improve existing key public spaces.

Bus Shelter Design

DCC notes that bus shelter locations are indicated on drawings but information is not provided on their proposed design, and whether there is sufficient capacity on the footpaths to accommodate them. The submission goes on to state that 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, Red lined conservation areas or special planning control schemes.

The NTA notes these comments. PDR Chapter 4 Preliminary Design, Section 4.13.6, included in the Supplementary Information, outlines the proposals for bus shelters, as follows: "Bus shelters provide an important function in design of bus stops. The shelter will offer protection for people from poor weather, with lighting to help them feel more secure. Seating will be provided to assist ambulant disabled and older passengers and accompanied with Real Time Passenger Information (RTPI) signage to provide information on the bus services. The locations of the bus shelters are presented on the General Arrangement drawing series in Appendix B." Refer also to EIAR Volume 2 Main Chapters, Chapter 4 Proposed Scheme Description. Section 4.6.4.5 sets out the general policy regarding the provision of bus shelters on the Proposed Scheme.

Appendix H of the PDR includes detail of Bus Stops and Shelters. The optimum configuration that provides maximum comfort and protection from the elements to the travelling public is the 3-Bay Reliance 'mark' configuration with full width roof. This shelter is a relatively new arrangement which has been developed by JCDecaux in conjunction with the NTA. The shelter consists mainly of a stainless-steel structure with toughened safety glass and extruded aluminium roof beams. Appendix H states:

"The BusConnects Design Guide suggests that an Island Bus Stop (Figure 34) is the preferred bus stop option to be used as standard on the CBC project where space constraints allow. The minimum footpath width within which an island bus stop can be implemented is 5.4m (1.8m footpath + 1.2m cycle track + 2.4m island with shelter). This option assumes a shelter with half bay end panels. Should full panels (as seen on Figure 2.10) be required the width requirement will increase to approximately 6.3m."



Figure 2.10 Standard 3 Bay Reliance Mark Shelter with full width advertising panel

For locations where space is constrained an option consisting of a shared bus stop landing zone can be considered. This option is indicated in Figure 2.11 and should only be considered on a case-by case basis to ensure suitability with particular attention paid to the volume of cyclists and volumes of boarding and alighting passengers. Using the narrowest non-standard bus shelter this would require a minimum width of approximately 4.0m (1.9m footpath with shelter + 1.2m cycle track + 0.75m island).



Figure 2.11 Example of a 3-Bay Reliance Cantilever shelter with a narrow roof configuration with and without half end panels.

The provision of bus shelters in proximity to buildings of architectural significance, has been assessed in EIAR Volume 2 Main Chapters, Chapter 16 Architectural Heritage, Section 16.4.4.1 notes the following with respect to protected structures:

- *“A bus shelter is proposed at 30 Thomas Street (DCC RPS 8773), a Protected Structure of Regional Importance and Medium Sensitivity. There is no bus shelter in this location currently. It is anticipated that the shelter will impact on the setting of 30 Thomas Street and the adjoining buildings. The Magnitude of impact will be Low. The potential Operational Phase impact is Indirect, Negative, Slight and Long-Term.*
- *A bus shelter is proposed at Miller’s Hall 120 Thomas Street (DCC RPS 8183), a Protected Structure of Regional Importance and Medium Sensitivity. There is no bus shelter in this location currently. It is anticipated that the shelter will impact on the setting of building. The Magnitude of impact will be Low. The potential Operational Phase impact is Indirect, Negative, Slight and Long-Term.*
- *A bus shelter is proposed at Taylor’s Hall High Street (RMP DU018020342) a Protected Structure of National Importance and High Sensitivity. Although it will be partially screened by an existing tree in the grounds of Taylor’s Hall, it is anticipated that the shelter will impact on the setting of building. The Magnitude of impact will Low. The potential Operational Phase impact is Indirect, Negative, Slight and Long-term.”*

Section 16.4.4.2 notes the following with respect to Architectural Conservation Areas:

- *“Two bus shelters are proposed within the Thomas Street ACA, the shelters at 30 Thomas Street and 120 Thomas Street. The ACA contains structures of National importance and High Sensitivity. The Magnitude of impact will be Low. The potential Operational Phase impact on the ACA is Negative, Slight and Long-Term”*

Section 16.4.4.3 notes the following with respect to Conservation Areas:

- *“Two bus shelters are proposed within the Thomas Street Conservation Area, the shelters at 30 Thomas Street and 120 Thomas Street. The Conservation Area contains structures of National importance and High Sensitivity. The Magnitude of impact will be Low. The potential Operational Phase impact is Indirect, Negative, Slight and Long-Term.*
- *Two bus shelters are proposed within the High Street Conservation Area at St Audeon’s Parish Centre, High Street (DCC RPS 3822) and Taylor’s Hall High Street (RMP DU018020342). The Conservation Area contains structures of National importance and High Sensitivity. The Magnitude of impact will be Low. The potential Operational Phase impact is Indirect, Negative, Slight and Long-term.”*

Section 16.4.4.4 notes all the effected NIAH Structures all of these have the potential operational phase impact of Indirect, Negative, Slight and Long-Term, they are listed below:

- A bus shelter is proposed at Cherry Orchard Hospital (NIAH 50080367);
- There is a proposed cantilever on Ballyfermot Road located opposite Cherry Orchard Hospital (NIAH 50080371);
- A bus shelter is proposed at Inchicore Terrace North (NIAH 50080408);
- A bus shelter is proposed at The Workman’s Club on Emmet Road Inchicore (NIAH 50080088);
- A bus shelter is proposed at Inchicore Library (NIAH 50080156);
- A bus shelter is proposed between 31a Old Kilmainham (NIAH 50080167) and 32 Old Kilmainham; and,
- A bus shelter is proposed at Ceannt Fort Mount Brown (NIAH 50080180).

Section 16.4.4.5 notes all the other structures effect all of these have the potential operational phase impact of Indirect, Negative, Slight and Long-Term, they are listed below:

- A bus shelter is proposed at St Andrew’s Terrace Ballyfermot Road (CBC0007BTH015);
- A bus shelter is proposed at 13 Woodfield Terrace (CBC0007BTH028);
- A bus shelter is proposed at The Workman’s Club on Emmet Road Inchicore, impacting on the setting of the adjoining 189 Emmet Road Inchicore (CBC0007BTH051);
- A bus shelter is proposed a house at 109 Emmet Road (CBC0007BTH057);
- A bus shelter is proposed between 31a Old Kilmainham and 32 Old Kilmainham (CBC0007BTH077);
- A bus shelter is proposed at 22 Faulkner’s Terrace (CBC0007BTH092); and,
- A bus shelter is proposed at 161 James’ Street, impact on the setting of the adjoining buildings at 162 James’s Street (CBC0007BTH109).

Siting of utility cabinets and above-ground utility infrastructure

DCC noted that the siting of utility cabinets, poles and other above-ground utility infrastructure may have significant impacts on the space, visual impact and quality of the public realm.

The NTA notes this comment. Significant efforts have been made during the design process to minimise above-ground utility infrastructure where practicable. Where such infrastructure is necessary, it has been sited in appropriate locations, and rationalised where practicable.

Palette of Materials

DCC noted that the ‘Typical Material Typologies’ in EIAR Volume 2 Main Chapters, Chapter 4 Proposed Scheme Description, Section 4.6.12.2.1 and EIAR Volume 3 Figures, Landscape General Arrangement Drawings, do not appear to include or refer to existing historic fabric such as historic granite paving and historic granite kerbs within the Proposed Scheme.

Heritage features to be retained are noted on the EIAR Volume 3 Figures, General Arrangement Drawings, where applicable. The following note is included on drawing sheets where heritage features are to be retained or relocated as well as the key:

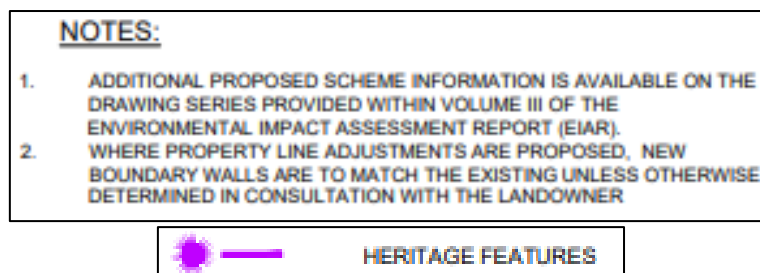


Figure 2.12: Heritage Notes and Key

Paving and surface treatments of architectural heritage value were identified at 12 locations as indicated in EIAR Volume 2 Main Chapters, Chapter 16, Architectural Heritage, Section 16.4.3.7.4. Further information is provided in EIAR Volume 4 Appendices Part 2 of 2, Appendix A16.2 Inventory of Architectural Heritage Sites.

Proposed mitigation measures for architectural heritage features (including historic paving) are outlined below and detailed in EIAR Volume 4 Appendices Part 2 of 2, Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric. The methodology has been prepared in accordance with the Architectural Heritage Protection: Guidelines for Planning Authorities (DAHG 2011a) and Paving: the conservation of historic ground surfaces (McLoughlin, DAHG 2015).

The Landscaping General Arrangement drawings in Volume 3 of the EIAR includes notes relating to existing stone setts and existing historic granite kerbing and paving.

EIAR Volume 2 Main Chapters, Chapter 17 Landscape (Townscape) and Visual, Section 17.4.1.4.4 notes the following:

“In addition to the above works, the following specific landscape / townscape and visual measures are included within the Proposed Scheme:

...

Proposals for the treatment of the urban realm within the streetscape impacted by the Proposed Scheme will have regard to the existing character of the street or location, to emerging policies, objectives and proposals for the urban realm and to opportunities for mitigation of impact on the urban realm and the streetscape. Proposals will have regard to historic details and features, to the quality of existing and proposed materials, to the reduction of clutter, ease of legibility, and management and maintenance requirements.”

Palette of street furniture

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

The NTA notes this comment. EIAR Volume 2 Main Chapters, Chapter 16 Architectural Heritage, Section 16.5.1.5 includes details of the impacts on existing street furniture of heritage value due to the Proposed Scheme, including post boxes, lamp posts and statuary and other street furniture. NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC City Architects Department comments as these matters were the subject of extensive liaison throughout the design development process.

The NTA will however continue the very positive and constructive liaison with DCC throughout the procurement and construction process including in relation to the final detailing of new street furniture.

Boundary Treatments

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

The NTA notes this comment. EIAR Volume 2 Main Chapters, Chapter 4 Proposed Scheme Description, Section 4.6.18.1 notes the following:

“There are a number of areas along the extents of the route where the Proposed Scheme will result in the requirement for accommodation works and boundary treatments. Specific accommodation works are considered on a case-by-case basis.

To maintain the character and setting of the Proposed Scheme, the approach to undertaking the new boundary treatment works along the corridor is replacement on a ‘like for like’ basis in terms of material selection and general aesthetics, unless a section of street can benefit from urban improvement appropriate to the area.”

As stated in EIAR Volume 2 Main Chapters, Chapter 16 Architectural Heritage Section 16.1, the impacts on boundary treatments have been assessed as part of the Architectural Heritage assessment, with appropriate mitigation measures outlined where necessary.

Integration of the materials palette of the proposed scheme with existing private landing areas and recently upgraded areas of the public footpath

DCC noted that a strategy for the resurfacing of private landings should be developed (with the owners consent) and the retention/replacement of newly resurfaced areas of public footpath should be devised so a consistent paving palette is used throughout the Proposed Scheme.

The NTA notes this comment. In relation to Private Landings, they have not been included within the Proposed Scheme red line boundary unless necessary to deliver the Proposed Scheme.

EIAR Volume 2 Main Chapters, Chapter 4 Proposed Scheme Description, Section 4.6.12.1 note the following:

“The landscape and urban realm proposals are derived from analysis of the existing urban realm, including existing character, any heritage features, existing boundaries, existing vegetation and tree planting, and existing materials. For each section of the route, the design took a broad overview of typical dwelling age and style, extents of vegetation and tree cover. The predominant mixes of paving types, appearance of lighting features, fencing, walls, and street furniture was considered. The purpose of this analysis was to assess the existing character of the area and how the Proposed Scheme may alter this. The outcome of the analysis allowed the designers to consider appropriate enhancement opportunities along the route. The enhancement opportunities include key nodal locations which focus on locally upgrading the quality of the paving materials, extending planting, decluttering of streetscape and general placemaking along the route. Where possible, a SuDS approach has been taken to assist with drainage along the route.”

Village Signage

DCC noted that existing ‘Welcome to Village xxx’ signage should be retained, in agreement with the local authority and community.

It is the intention of the Proposed Scheme to retain all such signage.

The NTA notes the general comments on the Proposed Scheme in this section and the recommendations in the Appendix.

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

Per Cent for Arts Scheme

The NTA notes the comments of the City Arts officer in relation to their request to apply for the Per Cent Art scheme as part of the development of the Proposed Scheme. NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC City Arts Officers comments. NTA will however continue the very positive and constructive liaison with DCC throughout the procurement and construction process.

Park Department Comments (Section 2.4.11)

The NTA notes the general comments on the Proposed Scheme in this section and the recommendations in the Appendix.

An arboricultural survey has been undertaken for the Proposed Scheme to identify the condition of potentially impacted trees. This survey is included in EIAR Volume 4 Appendices Part 2 of 2 Appendix 17.1. The Landscape Proposals for the Scheme including the maturity of the new trees utilised are outlined in Appendix B5 of the Preliminary Design Report. These landscape proposals include the number of new trees, hedge planting and planting species. The maintenance period is addressed in the Construction Environmental Management Plan in EIAR Volume 4 Appendices Part 1 of 2 Appendix 5.1 and EIAR Chapter 2 Main Chapters, Chapter 5 Construction. NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Parks, Biodiversity and Landscape Division comments as these matters were the subject of extensive liaison throughout the design development process. NTA will however continue the very positive and constructive liaison with DCC throughout the procurement and construction process.

EIAR Volume 2 Main Chapters, Chapter 17, Landscape (Townscape) and Visual, documents the potential landscape (townscape) and visual impacts associated with the Construction and Operational Phases of the Proposed Scheme. The impacted trees are presented in the EIAR Volume 3 Figures, Chapter 4 Proposed Scheme Description, 5. Landscaping General Arrangements and further described in EIAR Volume 4 Appendices Part 2 of 2, Appendix A17.1 Arboricultural Impact Assessment.

Despite the best efforts to protect trees, especially trees of a mature and significant stature there will be inevitable impacts on local trees. In total it is estimated that along the Proposed Scheme there will be 179 trees lost and 1,262m² of woodland area removed. This loss has been addressed through mitigation and replanting efforts as outlined in the planting strategy in the PDR resulting in a substantial tree planting plan with a net increase of 354 additional semi-mature trees and 504m² of woodland area along the Proposed Scheme.

As stated in the Preliminary Design Report, new street trees are proposed where footways are wide enough and below-ground services allow.

2.3.5 Conclusion (Section 2.5)

DCC is supportive of the Proposed Scheme and stated in their conclusion on page 54 of the submission:

“The proposed Liffey Valley 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 2016-2022 as well as the draft Dublin City Development Plan 2022-2028.”

DCC further confirmed (at page 54/55 of its submission) that the development of the Proposed Scheme will provide an upgraded and expanded bus network and quality of service together with better quality cycling and pedestrian facilities and DCC acknowledged that these improvements will make it easier for people to access and use public transport. It also acknowledged that the Proposed Scheme will, in turn, promote modal shift from the private car to more sustainable forms of transport including walking, cycling and public transport, ultimately contributing to the creation of a greener and more sustainable city.

2.3.6 Appendix – Recommendations and Conditions

DCC have set out at the start of their appendix a number of suggested conditions.

Proposed Condition 1

The first recommended condition requested by DCC states: 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.

NTA response:

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

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

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

Proposed Condition 2

The second recommended condition requested by DCC states:

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.

NTA response:

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

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

The Exchequer does not currently provide the NTA with funds for dispersal to local authorities for maintenance activities and the NTA does not have a role in overseeing or organising general public

road maintenance activities. However, the NTA does retain responsibility for bus fleet, bus stops and bus shelters, and maintenance of these elements falls within its remit.

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

Proposed Condition 3

The third recommended condition requested by DCC states:

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.

NTA response:

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

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

Traffic Division

The Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Traffic Division comments provided in the Appendix regarding consideration of the traffic management equipment that is necessary for the safe and efficient operation of this Public Transport corridor, and including all traffic signal equipment, and the relevant DCC specification. NTA is aware of, and acknowledges, the important role of the relevant DCC maintenance contractor, and their continued role on both the existing and new traffic signals. These matters were the subject of extensive liaison throughout the design development process.

DCC Traffic Division also requested that a co-ordinated loading and servicing strategy is developed and implemented by the NTA and DCC for businesses and traders surrounding Thomas Street and James’s Street. Taking on board the response provided above regarding comments made by the Roads Division, the NTA is satisfied that these are matters that can be successfully addressed between DCC and the NTA, in the absence of any approval condition.

Roads Division

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

Public Lighting Department

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

Environmental Protection Division

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

Air and Noise Pollution Control Unit

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

Archaeology Department

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

With regard to the depositing of an archaeological paper archive, the NTA will liaise with DCC in regard to archival processes.

Conservation Department

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

The proposed approach to safeguarding architectural interest of affected Architectural Heritage across the Proposed Scheme is covered in EIAR Volume 2 Main Chapters, Chapter 16 Architectural Heritage, Section 16.5.

Best conservation practice, specifications, and method statements for the careful and sensitive relocation and reinstatement of historic fabric is addressed in EIAR Volume 2 Main Chapters, Chapter 16 Architectural Heritage, Section 16.5.

The proposed engagement of an architectural heritage specialist and the duties is addressed in EIAR Volume 2 Main Chapters, Chapter 16 Architectural Heritage, Section 16.5.

The NTA will continue to engage with the relevant local authority departments in accordance with the relevant guidelines, policy and legislation outlined in EIAR Volume 2 Main Chapters, Chapter 16 Architectural Heritage, Section 16.2.4.

Best conservation practice and the Architectural Heritage Protection Guidelines for Planning Authorities (2011) and the Advice Series issued by the Department of Housing, Local Government and Heritage are referenced in EIAR Volume 2 Main Chapters, Chapter 16 Architectural Heritage, Section 16.2.4.

The proposed protection measures for all existing original architectural heritage features in the vicinity of the works are outlined in EIAR Volume 2 Main Chapters, Chapter 16 Architectural Heritage, Section 16.5.

The requirement of the appointed contractor relating to the Architectural Heritage is outlined in EIAR Volume 2 Main Chapters, Chapter 16 Architectural Heritage, Section 16.5.

City Architects Department

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