



An
Bord
Pleanála

Inspector's Report ABP-316272-23

Development	BusConnects Templeogue / Rathfarnham to City Centre Core Bus Corridor Scheme
Location	Templeogue / Rathfarnham to City Centre
Planning Authority	Dublin City Council
Applicant(s)	National Transport Authority
Type of Application	Application under Section 51 (2) of the Roads Act 1993 as amended
Observer(s)	Refer to Appendix 1.
Date of Site Inspection	20 th January, 8 th February, 1 st May & 10 th August 2024
Inspector	Fiona Fair

Contents

- 1.0 Introduction..... 3
- 2.0 Site Location and Description..... 4
- 3.0 Proposed Development 6
- 4.0 Submissions 20
 - 4.1. Prescribed Bodies 20
 - 4.2 NTA Response to Prescribed Bodies..... 36
 - 4.3 Third Party Observations 50
 - 4.4 NTA Response to Submissions..... 55
 - 4.5 Planning History 95
- 5.0 Policy Context 97
 - 5.1. European..... 97
 - 5.2 National 98
 - 5.3 Regional..... 104
 - 5.8 Local 105
 - 5.14 Legislative Context..... 122
 - 5.17 Heritage Designations and EIA..... 122
 - 5.18 Natural Heritage Designations 122
 - 5.20 EIA Screening..... 124
- 6.0 Assessment..... 124
- 7.0 Appropriate Assessment..... 241
- 8.0 Environmental Impact Assessment 285
- 9.0 Recommendation 419
- 10.0 Reasons and Considerations 419
- 11.0 Conditions 425

1.0 Introduction

- 1.1. The National Transport Authority has submitted an application to the Board under Section 51 (2) of the Roads Act 1993 as amended. This report sets out an assessment of the application submitted by the National Transport Authority for the development of a sustainable transport scheme which provides for both cycle and bus priority measures over a distance of approximately 10km from end to end online with additional offline upgrades and quiet street treatment of approx. 2km and 1.5km respectively. The proposed scheme will be comprised of two main alignments, namely from Templeogue to Terenure (3.7km), and from Rathfarnham to the City Centre (6.3km).
- 1.2. The proposed scheme is 1 of 12 no. bus corridor schemes within the Dublin area under the Bus Connects programme and is accompanied by a Compulsory Purchase Order reference ABP 316377-23. The objectives of the schemes are to:
 - Enhance the capacity and potential of the public transport system by improving bus speeds, reliability and punctuality.
 - Enhance the potential for cycling by providing safe infrastructure, segregated from general traffic wherever practicable.
 - Support the delivery of an efficient, low carbon and climate resilient public transport service, supporting the achievement of Ireland's emission reduction targets.
 - Enable compact growth, regeneration opportunities and more effective use of land in Dublin.
 - Improve accessibility to jobs, education, and other social and economic opportunities; and
 - 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.
- 1.3. Pre-application discussions were undertaken by the applicant with the Board in accordance with Section 51A of the Roads Act 1993 as amended, which provides for consultations with An Bord Pleanála before making an application under Section 51.
- 1.4. Since the commencement of the non-statutory period of the CBC Infrastructure Works, there has been a total of three rounds of non-statutory public consultation. The

Emerging Preferred Route (EPR) non statutory public consultation phase for the Proposed Scheme occurred from 23rd January 2019 to the 30th April 2019. The Preferred Route Option (PRO) non-statutory public consultation took place from 4th March 2020 to 17th April 2020. The public were invited to make written submissions in relation to the published proposals to the BusConnects Infrastructure team either through an online form, by email or by post. Due to the COVID-19 pandemic all further planned events scheduled after 12th March 2020 were cancelled. A third round of public consultation took place from 4th November 2020 to 16th December 2020. This third round was carried out using virtual consultation rooms, offering a 'call-back' facility along with descriptions, supporting documentation and mapping of the draft PRO as well as information on all revisions, if any, made since the PRO non-statutory public consultation. I note the 794-page Public Consultation Report 2018 – 2022 for the Templeogue / Rathfarnham to City Centre CBC scheme attached to the application. Section 2.4 'Execution and Impact', of this report, sets out a summary of the whole CBC Infrastructure Works communication channels and level of engagement since the first round of consultation was launched in November 2018.

- 1.5. A determination in relation to whether the project is strategic infrastructure or not is not required under this Act. An extension of time for inspection and for the making of submission / observations was provided beyond the initial date of 20th June 2023 to 15th August 2023.
- 1.6. The Application is accompanied by and EIAR and a NIS. No Oral Hearing was held in relation to the application as per the Boards Direction dated 20/02/24.

2.0 Site Location and Description

- 2.1. The proposed scheme submitted under this application will comprise the construction of the Templeogue / Rathfarnham to City Centre Bus Corridor which has an overall length of approximately 10km from end to end online with additional offline upgrades and quiet street treatment of approx. 2km and 1.5km respectively. The Proposed Scheme will be comprised of two main alignments, namely from Templeogue to Terenure (3.7km), and from Rathfarnham to the City Centre (6.3km).
- 2.2. The Templeogue to Terenure section will commence on the R137 Tallaght Road adjacent to D'Arcy McGee's, east of the M50 junction 11 interchange. From here, the Proposed Scheme is routed via the R137 along Tallaght Road and Templeogue Road,

through Templeogue Village, to Terenure Cross, where it joins the Rathfarnham to City Centre section.

- 2.3. The Rathfarnham to City Centre section will commence on the R821 Grange Road at the junction with Nutgrove Avenue, and will be routed along the R821 Grange Road, the R115 Rathfarnham Road, the R114 Rathfarnham Road, Terenure Road East, Rathgar Road, Rathmines Road Lower, Richmond Street South, Camden Street Upper and Lower and Wexford Street as far as the junction with the R110 at Kevin Street Lower and Cuffe Street where priority bus lanes will end. From Cuffe Street to Dame Street along Redmond's Hill, Aungier Street, and South Great George's Street the route will involve a traffic lane and a cycle track in both directions where it will join the prevailing traffic management regime in the City Centre.
- 2.4. In addition to the above, an alternative cycle facility will be provided along Harold's Cross Road / Terenure Road North between Terenure Cross and Parkview Avenue, as well as along Bushy Park Road, Wasdale Park, Wasdale Grove, Zion Road and Orwell Road.
- 2.5. It is highlighted throughout the application that the initial route selection comprised of two separate sections (i) the Tallaght to Terenure and (ii) the Rathfarnham to City Centre section. However, as a result of careful consideration of the alternative route options, these two sections have now been combined in a single route as the Proposed Scheme. The principal reasons for combining the Tallaght to Terenure section and the Rathfarnham to City Centre section into the Proposed Scheme include: their geographical association, functional interdependence and the fact that the Tallaght to Terenure section joins the Rathfarnham to City Centre section at the junction of the R114 Rathfarnham Road and R137 Terenure Road and shares the remaining section of the route from that junction to the City Centre.
- 2.6. It is proposed to provide two Bus gates along the scheme, Bus priority will also be achieved by signal controlled priority and right and left turn bans are also proposed to prevent traffic diverting inappropriately.
- 2.7. An inbound Bus Gate is proposed at the junction of Olney Grove, which will restrict northbound general traffic on Templeogue Road from accessing Terenure Road West or Terenure Place during the hours of operation of the Bus Gate (06:00 – 20:00 - 7 days a week). A right turn ban is proposed from Fergus Road to Templeogue Road, and a left turn ban from Olney Grove to Templeogue Road.

- 2.8. A second Bus Gate is proposed between Richmond Hill and Lissenfield, in Rathmines, which will restrict general traffic movements during the hours of operation of the Bus Gate (06:00 – 20:00 - 7 days a week).
- 2.9. It is proposed to introduce a 30 kph speed limit on Rathfarnham Road to the City Centre, due to the presence of multiple urban villages along the route, as well as other sections where cyclists share the bus lane.
- 2.10. Turning restrictions are proposed at a number of locations off the immediate CBC route to prevent through traffic diverting inappropriately. These locations are highlighted below within the four geographical sections.

3.0 Proposed Development

3.1. Overview

- 3.1.1. In general, the Proposed Templeogue / Rathfarnham to City Centre Core Bus Corridor Scheme (“the Proposed Scheme”) provides upgrades to, and expansion/increase of the bus priority measures, cycling infrastructure and pedestrian facilities throughout the corridor. The measures being proposed include the provision of bus lanes, upgraded/relocated and additional bus stops, amendments to junctions, bus prioritisation through traffic management, segregated cycle tracks, amendments to parking and loading bay provisions (including reductions to and relocation of such areas), as well as improving pedestrian facilities (footpaths, signal crossings etc.), the provision/amendment of Toucan crossings to facilitate pedestrian and cyclist movements and the provision of landscaping/public realm improvements. (Toucan crossings are provided at signalised junctions which cannot accommodate segregated cycle crossings, i.e. crossing facilities for pedestrians and cyclists are shared). Throughout the scheme, junction arrangements for general traffic are consolidated with turning radii reduced to slow traffic, left turning filter lanes omitted (to reduce unsafe conflicts between general traffic and cyclists/pedestrians), and specific junction crossing arrangements provided for pedestrians and cyclists. On minor junctions along the route raised table crossings are being provided to facilitate pedestrian and cyclist crossing movements. The overall design approach for the Proposed Scheme, is set out in the Preliminary

Design Guidance Booklet for BusConnect Core Bus Corridors which is included in the application documentation (Appendix A4.1 of the EIAR refers).

- 3.1.2. Junctions within the entire BusConnects Core Bus Corridor programme have been categorised into 4 general types, and each is described in Appendix A4.1 of the submitted EIAR (BusConnects Preliminary Design Guidance Booklet - BPDG). It is important to note that of these four options Type 1 or Type 3 junctions are proposed in the main, with one Type 4 Junction (Templeogue Road / Wellington Lane) (Section 7.4.1 and 7.4.3 of the BPDG refers) proposed within the Proposed Scheme.
- 3.1.3. Appendix A6.3 of the EIAR specifically sets out the junction design adopted for each junction. A total number of 32 junctions in the Proposed Scheme are presented in this report. Both type 1, 3 and 4 junction arrangements offers protection for cyclists (and pedestrians) at all junctions with protected kerbing provided on the corner of junctions, tighter turning radii are also provided at all junctions to force left-turning vehicles to slow down more, and the kerbing and cycle lane arrangements will require right-turning and straight-ahead cyclists to stay on the raised and segregated cycle track right up to the junction and will thus avoid traffic conflicts from weaving through lanes. The main differences between Type 1 and type 3 junctions are that (a) the bus lanes in type 3 are terminated just short of the junction to allow left-turners to turn left from a short left-turn pocket in front of the bus lanes (buses can still proceed forward from this lane where there is a receiving lane). A type 3 junction is proposed where the volume of left turning vehicles is less than 100-PCUs per hour and a type 1 junction is provided where left-turning vehicle volumes are greater than 100-PCUs per hour. There are also differences in traffic management controls, with type 1 junctions and type 3 junctions differing in the timing of when cyclists, buses and general traffic are released to proceed. Junction Type 4 is similar to a 'CYCLOPS' junction (used in Manchester, UK) where cycle facilities are provided outside the pedestrian crossings at the junction as opposed to inside the pedestrian crossings as is the case for junction types 1-3 (i.e. cycle track is located between the pedestrian crossing landing area and the footpath); however, this version of the CYCLOPS proposes signalised pedestrian crossings across the cycle tracks to allow the pedestrian to cross from the footpath to the pedestrian crossing landing areas, thus avoiding any uncontrolled pedestrian-cyclist conflict. Bus lanes are terminated just short of the junction to allow left turners to turn left from a short left-turn pocket in front of the bus lane. Buses can continue straight ahead from this pocket where a

receiving bus lane is proposed. No two junctions are the same and some junction types are n/a to Junction Type 1 – 4, as described, where there is no bus priority proposed.

- 3.1.4. At bus stops it is generally proposed to provide bus shelters, and the stops are one of three typologies. There is a hierarchy in bus stop design options starting with the preferred “island bus stop”, followed by the “shared bus stop landing zone”, and then finally the “lay-by bus stop”, each of these are described with images in section 4.6.5.5 of the EIAR and section 11 of the Preliminary Design Guidance Booklet (Appendix A4.1 of the EIAR). The location of Shared Landing Bus Stops, which are used for most of the bus stops along the Proposed Scheme, are described in Section 4.5 of the EIAR. Where there are no cycle tracks provided, inline bus stops are used, where the users departing the bus exit straight on the footway. Inline bus stops will typically be found in the constrained sections of the Proposed Scheme such as on Terenure Road East and Redmond’s Hill / Aungier Street/South Great Georges Street.
- 3.1.5. The island bus stop features the deflection of the cycle track behind the bus stop and any associated shelter which will be provided on a c. 3m wide island offering direct access and egress from buses. The deflected cycle track will be ramped and narrowed to reduce speeds and marked/lit to highlight pedestrian activity. A pedestrian priority crossing point is provided with part-time signals to avoid cyclist/pedestrian conflicts for access to the bus stop area. Visually impaired pedestrians may call on part time signals within this arrangement, where necessary. In the shared bus stop landing zone arrangement the cycle track is again deflected behind the bus landing/access zone (but runs between the bus shelter/footpath area and the bus loading/offloading zone) with the same speed controls for cyclists augmented by corduroy tactile paving and additional narrowing of the track, and signage highlighting the presence of bus passenger traffic. There are no dedicated pedestrian priority signals in the shared bus stop landing zone although pedestrian priority is provided through design to allow crossing of the cycle track to a 1m wide dwell area where passengers can get on and off the bus. Lay-by bus stops are similar to island bus stops in terms of the arrangements between cycle tracks, bus shelter and bus access/egress, however, in this arrangement the bus pulls in off the carriageway/bus lane – such stops cater for buses with longer dwell times at a stop and allows other buses to continue past on the bus lane).

- 3.1.6. Two bus gates are proposed as part of the Proposed Scheme at Lissenfield, Rathmines Road Lower between Castlewood Avenue and Grove Road and at Olney Grove, on Templeogue Road close to the junction of Terenure Place/Terenure Rd West. A bus gate is a sign-posted short length of stand-alone bus lane which leads into a shared general traffic and bus lane. General traffic will be directed by signage to divert away to other roads before it can arrive at the bus gates. The Bus gates will be operational from 06.00 to 20.00.
- 3.1.7. As a general policy, shelters will be provided at all bus stops on the Proposed Scheme. This will improve the comfort of passengers waiting for a bus during poor weather, as well as providing shade on sunny days. It is acknowledged, that in some locations, such as those designated as Architectural Conservation Areas, it may not be appropriate to provide a bus shelter in front of a building of heritage value to minimise visual impact.
- 3.1.8. Signage throughout the Proposed Scheme will be in accordance with the Traffic Signs Manual. Additional signage will be provided throughout to ensure new traffic arrangements and management is clear and will require the use of specifically designed signage to ensure that road users have clarity on the rights of way and yielding necessary to ensure satisfactory operation of the BusConnects system. Some bespoke signage will be necessary including the use left turn flashing amber arrows to ensure motorists turning left are aware of, and yield to, cyclists. Furthermore, one of the characteristics of the Proposed Scheme is that predominantly there will be a ban on left turns from the bus lanes and accordingly “No Left Turn from Bus Lane” signage will be required (i.e. in most situations general traffic will not be allowed to filter into a bus lane to make a left turn, and taxi’s and buses wishing to do so will be required to move into the general lane when approaching type 1 junctions).
- 3.1.9. The Proposed Scheme provides for the following in terms of carriageway and footpath widths:
- Bus lanes, generally of 3m in width in areas with a speed limit <60kmph and 3.25m in areas with a speed limit of >60kph.
 - General traffic lanes, as above – although 2.75m lanes are permissible on straight roads sections with very low HGV traffic.

- Pedestrian paths, generally with a minimum width of 2m, however 1.2m minimum widths being considered appropriate at pinch points.
- Segregated cycle tracks, generally with a width of 2m (one-way), segregation is provided through kerbing between the cycle tracks and pedestrian paths and/or bus lanes/stops.

3.1.10. The overall design allows for deviations from the above specified lane widths over shorter sections to allow for specific physical constraints, e.g. to avoid extant buildings, protection/ avoidance of mature trees, traffic pedestrian safety, or reduce CPO/land-take requirements. The Proposed Scheme does not include bus or traffic lanes of less than 3m in width, where pinch points have to be addressed these are accommodated through deviations (narrowing) in cycle track and pedestrian widths and are discussed further in the section descriptions below.

3.2. The Proposed Scheme will make significant improvements to pedestrian and cycling facilities and to bus priority. Key changes that will be made to the existing corridor are the following:

- The number of pedestrian signal crossings will increase by 39% from 76 to 106 as a result of the proposed scheme;
- The proportion of segregated cycle facilities will increase from 28% on the existing corridor to 85% on the proposed scheme; and
- The proportion of the route having bus priority measures will increase from 32% on the existing corridor to 87% on the Proposed Scheme.
- Landscaping/planting alterations including the removal/loss of mature established trees and planting.

3.3. The proposed scheme is broken into the following geographical sections:

- Section 1: Tallaght Road to Rathfarnham Road;
- Section 2: Nutgrove Avenue to Terenure Road North – Grange Road, Rathfarnham Road;
- Section 3: Terenure Road North to Charleville Road – Terenure Road East, Rathgar Road; and

- Section 4: Charleville Road to Dame Street.

Section 1: Tallaght Road to Rathfarnham Road

- 3.4. Between the M50 interchange and the Spawell Roundabout junction it is proposed to relocate the existing two-way cycle track to the carriageway side of the footpath to better tie in with proposals at the Wellington Lane junction.
- 3.5. It is proposed to convert the Spawell Roundabout to a signalised junction with kerb protection for cyclists. The existing cycle track on the northern side of the carriageway will be relocated to the carriageway side of the footpath, and a new cycle track provided on the southern side of the carriageway between Cheeverstown and the Wellington Lane junction.
- 3.6. Enhanced cycle facilities will also be provided at Cypress Grove Road junction, with the introduction of kerb protection.
- 3.7. The existing free standing stone arch adjacent to the R137 Templeogue Road will be cleared of overgrown vegetation and conserved in its existing location. The existing fencing around the arch will be removed and the arch opened up to the public realm. It is proposed to install high quality stone paving, decorative lighting and soft landscaping elements around the arch as well as to construct a new footpath running behind the arch.
- 3.8. The existing service/access road serving 252 to 258 Templeogue Road will be converted to provide a shared surface for vehicles and pedestrians.
- 3.9. Bus lanes and traffic lanes are proposed between the Cypress Grove Road junction and the Ashfield Place development. Land take will be required from a number of residential properties on the northern side of the carriageway to achieve this.
- 3.10. Dedicated cycle facilities are provided on the approach to the Cypress Grove Road junction, however these will terminate approximately 100m from the junction where cyclists will share the bus lane in an inbound direction and the general traffic lane in an outbound direction. To improve safety for cyclists, it is proposed to introduce a 30kph speed limit between Cypress Grove Road and Templeogue Village.
- 3.11. Signal-controlled priority will be used for 170m of the outbound bus lane outside the Ashfield Place development, as there is insufficient space for a bus lane and a general traffic lane in each direction.

- 3.12. Between Ashfield Place and the Templeogue Tennis Club, it is proposed to provide a bus lane and a general traffic lane in each direction.
- 3.13. Within Templeogue Village, between Templeogue Tennis Club and the Templeville Road junction, it is proposed to manage bus priority through the use of Signal-controlled priority and tie into South Dublin County Council's Templeogue Village Initiative Scheme.
- 3.14. North of Templeogue Village, a cross section consisting of a general traffic lane, and bus lane and a cycle track in each direction is resumed. Between the village and the Springfield Avenue junction, the width of the proposed cycle tracks is reduced locally to minimise the impact on existing mature trees in this section.
- 3.15. At the junction with Templeville Road, general inbound through traffic may divert to the R112 and further to the R114 through the reintroduction of the right turn onto Springfield Avenue. It is proposed to introduce kerb protection at this junction which will improve cycle facilities and cyclist safety.
- 3.16. Between the Templeville Road junction and Fortfield Road it is proposed to provide one bus lane, one general traffic lane and cycle tracks in each direction. The proposed cycle tracks have been narrowed to 1.5m along this section to minimise impacts on mature trees tree on the eastern side of the road.
- 3.17. It is proposed to upgrade the Fortfield Road junction to provide a direct, protected cycle crossing for inbound cyclists to a proposed two-way cycle facility on the eastern side of Templeogue Road north of the junction.
- 3.18. Between Fortfield Road and Terenure Road West,8 on the Templeogue Road it is proposed to maintain one outbound bus lane, one outbound general traffic lane and one inbound general traffic lane.
- 3.19. A segregated two-way cycle track and footpath is proposed on the southern side of the carriageway within Bushy Park along the alignment of the existing shared path. This cycle track will link to a quiet street treatment on Rathdown Drive. The existing dirt path through the green space adjacent to Rathdown Drive will be formalised as a footpath.
- 3.20. It is proposed to provide an inbound Bus Gate at the junction of Olney Grove, which will restrict northbound general traffic on Templeogue Road from accessing Terenure

Road West or Terenure Place during the hours of operation of the Bus Gate (06:00 – 20:00 - 7 days a week).

3.21. *A right turn ban is proposed from Fergus Road to Templeogue Road, and a left turn ban from Olney Grove to Templeogue Road.*

3.22. *Right turn bans are also proposed from:*

- *Templeogue Road to Rathdown Park and to Rathdown Avenue and*
- *Fortfield Road to Greenlea Road and to Lavarna Grove*

3.23. A quiet street treatment is proposed along Rathdown Crescent to tie into the proposed quiet street treatment on Rathdown Park.

Section 2: Nutgrove Avenue to Terenure Road North – Grange Road, Rathfarnham Road

3.24. It is proposed to upgrade the junction of Grange Road and Nutgrove Avenue through the provision of kerb protection for cyclists. This will require land take from the entrance to the Rathfarnham Wood development. It is also proposed to reconfigure the existing car park adjacent to this junction to facilitate the revised road arrangement and to install a new island bus stop layout.

3.25. Between Rathfarnham Wood and the Castleside Drive junction it is proposed to provide a single bus lane alongside general traffic lanes and cycle tracks in both directions. To accommodate the road layout, it is proposed to land-take from adjacent properties, including setting back the existing boundary wall to Rathfarnham Castle Park.

3.26. The existing boundary wall of Rathfarnham castle will be set back and reconstructed with a round capping roughcast render.

3.27. It is proposed to upgrade the junction of Rathfarnham Road and Willbrook Road through the provision of kerb protection for cyclists.

3.28. It is proposed to upgrade the junction of Rathfarnham Road and Butterfield Avenue through the provision of kerb protection for cyclists. This will require the removal of general traffic lanes on the Butterfield Avenue arm of this junction.

3.29. On the section of Rathfarnham Road between Castleside Drive and Dodder Park Road, it is proposed to provide an inbound bus lane, two general traffic lanes and a

1.5m wide outbound cycle track, with outbound bus priority provided through signal-controlled priority. Due to construction related constraints, the inbound cycle track will be curtailed over approximately 270m, with cyclists utilising the bus lane over this short section. A section of inbound cycle track will be provided at either end of this section, on approach to junctions.

- 3.30. It is proposed to introduce a 30 kph speed limit on Rathfarnham Road to the City Centre, due to the presence of multiple urban villages along the route, as well as other sections where cyclists share the bus lane.
- 3.31. To maintain bus priority through the Dodder Park Road and Rathfarnham Road junction, it is intended to provide signal-controlled priority on the southern and northern approaches to the junction. It is proposed to upgrade this junction through the provision of kerb protection for cyclists, which will tie into the proposed Dodder Greenway on Dodder View Road and Dodder Road Lower.
- 3.32. Between Dodder Park Road and Rathdown Park, it is proposed to provide bus priority through a combination of signal-controlled priority and partial bus lanes, with 1.5m wide cycle tracks provided.
- 3.33. Between Rathdown Park and Bushy Park Road, no bus lanes are proposed. It is proposed to maintain bus priority by providing signal-controlled priority in both directions and managing traffic queues in this area.
- 3.34. From Bushy Park Road to Terenure Road North it is proposed to provide 1.5m wide cycle tracks, bus lanes and traffic lanes in both directions.
- 3.35. At the Terenure Road North junction it is intended to extend the existing bus lane and proposed cycle track as far as the junction stop line. Bus movements through this junction will be managed with signal-controlled priority.
- 3.36. A number of existing parking spaces on the approach to Terenure Village will be removed.

Section 3: Terenure Road North to Charleville Road – Terenure Road East, Rathgar Road

- 3.37. On Terenure Road East (TRE), between the Terenure Road North (TRN) junction and St. Joseph's Church, due to the proximity of existing built form to the carriageway, it is proposed to provide a single general traffic lane in each direction. Bus priority will be provided through this section by signal-controlled priority. It is also

proposed to widen the footpaths within this section and to provide high-quality urban realm within Terenure Village.

- 3.38. Between St. Joseph's Church and the Rathgar Avenue junction it is intended to provide a bus lane and general traffic lane in both directions. To accommodate this it is proposed to acquire land from adjacent properties on both sides of Terenure Road East.
- 3.39. It is proposed to provide an alternative cycle facility consisting of cycle tracks in each direction along TRN and Harold's Cross Road, connecting to the Kimmage to City Centre Core Bus Corridor Scheme at Harold's Cross. An additional alternative cycle facility is proposed along Bushy Park Road, Wasdale Park, Wasdale Grove, Victoria Road, Zion Road and Orwell Road to provide a secondary east-west route for cyclists travelling between Rathfarnham Road and Rathgar Road.
- 3.40. At Rathgar Avenue, it is proposed to maintain bus priority through the junction with signal-controlled priority.
- 3.41. Along Rathgar Road it is proposed to provide bus lanes and 1.5m wide cycle tracks in each direction and a one-way inbound general traffic lane only. Local access for residents on Rathgar Road and adjoining streets will be maintained through the surrounding road network via Rathgar Avenue or Rathmines Road Upper including Frankfort Avenue, Leicester Avenue, Garville Avenue, Garville Road and Highfield Road.
- 3.42. It is proposed to upgrade the junction of Rathgar Road and Grosvenor Road through the provision of kerb protection for cyclists.
- 3.43. *It is proposed to remove the current right turn ban from Rathmines Road Upper to Highfield Road as well as the right turn ban from Highfield Road onto Rathgar Road to facilitate outbound general traffic movements.*

Section 4: Charleville Road to Dame Street

- 3.44. On Rathgar Road and Rathmines Road Lower between Charleville Road and Castlewood Avenue it is proposed to provide an inbound bus lane, an inbound and outbound traffic lane and cycle tracks in each direction. Outbound bus priority will be provided through signal controlled priority.
- 3.45. It is proposed to upgrade the junction of Rathmines Road Upper with Rathmines Road Lower/Rathgar Road through the provision of kerb protection for cyclists. An

upgraded public realm will be provided at this junction through the reallocation of road space.

- 3.46. Between Castlewood Avenue and Grove Road, a general traffic lane and a cycle track in each direction are proposed, with the provision of a Bus Gate between Richmond Hill and Lissenfield which will restrict general traffic movements during the hours of operation of the Bus Gate (06:00 – 20:00 - 7 days a week). This proposal also allows for some increase to footpath widths through Rathmines and the provision of 2m wide cycle tracks in each direction through the village.
- 3.47. It is proposed to reverse the existing one-way traffic regime on Williams Park to facilitate traffic to turn off of the main CBC route at Military Road in advance of the Bus Gate and return via Williams Park.
- 3.48. It is proposed to provide a mini-roundabout outside of St Mary's College to facilitate school drop off.
- 3.49. It is proposed to restrict movements on Mountpleasant Street Lower, north of the junction with Richmond Hill to pedestrians and cyclists, through the introduction of planted build-outs.
- 3.50. It is proposed to reintroduce the right turn from Richmond Hill to Mountpleasant Avenue Upper, to facilitate general traffic to turn off of the main CBC route at Richmond Hill in advance of the Bus Gate and return via Mountpleasant Avenue Upper. Due to the restricted road width at this location, a traffic light shuttle system is proposed to safely manage these traffic movements.
- 3.51. At La Touche bridge it is proposed to provide an inbound bus lane and an outbound general traffic lane along with a high quality segregated cycling facility, to facilitate connectivity with the Grand Canal cycleway. Inbound general traffic will be required to turn left onto Grove Road at this point. Outbound bus priority across the bridge will be provided through signal controlled priority from a proposed traffic signal on Richmond Street South approximately 70m north of the bridge.
- 3.52. On Richmond Street South, it is proposed to maintain the outbound traffic lane with a bus lane and cycle tracks in both directions. Immediately south of the junction of Harrington Street/Harcourt Road/Richmond Street South, the outbound bus lane will be curtailed due to space constraints.

- 3.53. It is proposed to restrict movements into and out of Lennox Street to pedestrians and cyclists, through the introduction of planted build-outs. It is also proposed to upgrade the junction of Richmond Street South and Harrington Street through the provision of kerb protection for cyclists.
- 3.54. On Camden Street Upper between Harcourt Road and Charlotte Way, one bus lane in each direction and one inbound general traffic lane is proposed, with a cycle track provided in each direction.
- 3.55. Between Charlotte Way and Cuffe Street it is proposed to provide bus lanes in each direction and a single outbound general traffic lane on Camden Street/Wexford Street. The outbound bus lane will not commence until just south of Montague Street due to the proximity of existing built form to the carriageway. Bus priority will be achieved by signal controlled priority over this section. Under this proposal, inbound traffic will reroute to Harcourt Street to access Cuffe Street and beyond. 1.5m wide cycle tracks are proposed in this section in order to provide sufficient footpath space in this area of significant pedestrian activity.
- 3.56. Between Cuffe Street and Dame Street it is proposed to provide one general traffic lane and one cycle track in each direction. No bus lanes will be provided on this section of the route.
- 3.57. Where practicable, on-street parking bays and loading bays will be retained.
- 3.58. The Proposed Scheme ties into the existing road network on Dame Street.
- 3.59. *Turning restrictions are proposed at a number of locations off the immediate CBC route to prevent through traffic diverting inappropriately. These locations are:*
- *Proposed right turn ban from Grand Parade onto Dartmouth Place;*
 - *Proposed right turn ban from Cullenswood Road onto Ranelagh Road;*
 - *Proposed right turn ban from Ashfield Road onto Ranelagh Road;*
 - *Proposed left turn bans from Chelmsford Lane and Sallymount Avenue onto Ranelagh Road; and*
 - *Proposed right turn ban from Merton Drive onto Sandford Road*
- 3.60. Key improvements and Specific works include:**
- 17.4 Km (two-way) of bus priority infrastructure and traffic management

- Increase in bus priority from 4.4km inbound to 6.1km and from 1.5km outbound to 5.4km
- Proportion of route with bus measures will increase from 32% to 87%
- Reconfiguration of existing bus stops resulting in 60 number new bus stop facilities.
- Total cycle facilities in both directions increasing from 11km to 23.3km (112%) proportion segregated increasing from 28% to 85.4%
- Cycle facilities segregated inbound to increase from 1.3km to 9.6km and out bound from 1.8km to 10.3km
- Cycle facilities non-segregated inbound to decrease from 3.3Km to 1.7km and out bound from 4.6km to 1.7km
- With regards to cycle parking, the proposed scheme will increase provision by 49% to a total of 328 spaces across the entire corridor.
- Provision of new / refurbished pedestrian facilities and footpaths along the scheme and associated ancillary works.
- Number of pedestrian signal crossings will increase from 76 to 106.
- Provision of 32 junction upgrades and associated ancillary works.
- Provision of 105 new / refurbished raised table side entry facilities.
- Overall, the proposed scheme will provide an average increase in footway area for pedestrians of 25% inbound and 28% outbound.
- Public realm works including landscaping, planting, street furniture, street lighting, boundary walls, and sustainable urban drainage measures.
- Roads associated earthworks including excavation of material, importation of material and temporary storage of materials.
- Provision of road pavement, signing, lining and ancillary works.
- Provision of gates, fencing and boundary treatment works.
- Provision of new and diverted drainage infrastructure.
- Diversion of utilities and services including ancillary works.
- Construction of accommodation works including boundary treatments and ancillary grading and landscaping works together with all ancillary and consequential works associated therewith.
- Carparking provision will be reduced by 54 parking spaces and five loading bays as part of the proposed scheme, the majority of these are commercial spaces and have a range of alternative parking spaces within a 200m vicinity/ on side streets.

Specific details relating to all aspects of the development are outlined within the 'Project Design' section of this report within the assessment section hereunder.

3.61. Drainage

3.61.1. The surface water drainage system for the Proposed Scheme will discharge to 18 catchment areas based on topography and the existing pipe network. Whilst in some areas the Proposed Scheme will increase the impermeable areas, additional permeable areas are also provided by the softening of urban realm along the routes. The drainage design aims to sustain flow levels within the existing pipe network after a rainfall event by controlling the discharge rate within each catchment. Flows will be controlled by the implementation of SuDS techniques, where practicable. One of the principal objectives of the road drainage system is to minimise the impact of the runoff from the roadways on the surrounding environment via the position of: filter drains, swales, bio-retention areas, tree pits, oversized pipes, silt traps and attenuation features if necessary.

3.62. Construction

3.62.1. The construction phase is estimated to last for 24 months and will be carried out in phases along the corridor, in this regard the Board is referred to table 5.2 of the EIAR which sets out the proposed phases, and duration of the construction programme over the total of 18 different sections of the route. The programme and location of works has been designed to provide as much separation between sections under construction at any given time. The main components of each of the construction stages are set out below:

- Site preparation and clearance,
- Removal of existing boundaries, pavements, lighting columns, bus stops, and signage,
- Protection and/or diversion of buried services,
- Road widening, pavement reconstruction, and kerb improvements,
- Reconfiguration of traffic lanes throughout,
- Installation of new bus stops and junction/roundabout modification,

- Property boundary reinstatement, signage replacement, relocation of and/or installation of lighting columns, and
- Landscaping and tree planting and reinstatement of temporary land acquisitions.

The applicant lodged the application to the Board on the 14th April 2023. The application was accompanied by the following documents:

- Environmental Impact Assessment Report (EIAR)
- Appropriate Assessment (AA) Screening Report
- Natura Impact Assessment (NIS)
- Location Maps, plans and particulars, (General Arrangement Maps)
- Supplementary Information including:
 - Preferred route Options Report (PRO)
 - Preliminary Design Report (PDR)
 - Public Consultation Report 2018 – 2022
- Relevant Public Notices and Prescribed Body Notices.

4.0 Submissions

4.1. Prescribed Bodies

4.1.1. Submissions have been received from 4 no. prescribed bodies which are summarised hereunder. Submissions are generally in support of the proposed development and do not raise any significant issues in relation to the EIAR or NIS submitted. General comments are made in relation to works relating to footpath widths, local public realm improvements, land acquisition by the NTA, construction compounds, bus shelter design, the removal of vegetation, loss of trees within Rathfarnham Castle Park, protection of Recorded Structures and Monuments and watercourses during construction works:

1. Dublin City Council

- In terms of planning policy, it is stated that the proposed development is in compliance with the RSES and is recognised as a development which will support regional growth for the Eastern and Midlands Region and the Dublin MASP. High quality bus corridors will enable and support the delivery of both residential and economic development opportunities.

- It is noted that the RSES supports the delivery of key sustainable transport projects including BusConnects as set out in RPO 5.2.
- The proposal has been considered in relation to the core strategy of the Dublin City Council Development Plan 2022 – 2028 – sustainable movement and transport and other relevant policies.
- Policies of note include:
 - SMTI Modal Shift and Compact Growth
 - SMT3 Integrated Transport Network
 - SMT4 Integration of Public Transport Services and Development
 - SMTS Public Realm Enhancements
 - SMTII Pedestrian Network
 - SMT22 Key Sustainable Transport Projects
 - QHSNII 15-Minute City
 - CEE12 Transition to a Low Carbon, Climate Resilient City Economy
- It is stated that it is not the role of Dublin City Council to comment on the acceptability or not of the EIAR and its findings, but it is noted, that the content points generally to the development having negligible impact on the existing environment.
- The NIS is acceptable, no concerns are raised in relation to the conclusion of the NIS.
- The development is largely on road and footpaths whereby there is no specific zoning objectives. The areas required for construction compounds will be for a temporary period. Reinstatement works will be carried out following construction. The proposed scheme will not prevent any long-term zoning objective for the land from being achieved.
- The corridor for the proposed Templeogue/Rathfarnham to City Centre Bus Connects scheme traverses the Zone of Archaeological Constraint for Recorded Monument DUOIS-020 (Historic City) from Camden Street Lower until the termination of the scheme at Dame Street. This Recorded Monument DUOIS-020 (Historic City) is listed on the Record of Monuments and Places (RMP) and is subject to statutory protection under Section 12 of the National Monuments (Amendment) Act 1994. Also it is stated that, the proposed scheme traverses the Historic City as depicted in the Dublin City Development Plan (see

Map L). No concerns are raised in this regard the proposal is considered compatible and consistent with the zoning objectives for the area.

- The council is satisfied that the proposed development which falls within the administrative boundary of the Council will not have any excessive or undue impact on the amenities of the area.
- Temporary traffic disruption is acknowledged but long-term impacts are considered to provide for enhanced amenities.
- The scheme is fundamental to achieving the objectives of compact and sustainable growth; sustainable mobility and permeability and place making, while significantly contributing towards climate action.
- It is stated that there will be a need for sharing of space including kerbside space, which will need to be managed to ensure that there is no undue adverse impact on the ability of residents and visitors to access local services on foot or on the ability to achieve the '15-minute city'.

Forward Planning Department Comments

- The scheme is fundamental to achieving the strategic objectives envisaged in the Dublin City Development Plan 2022-2028, pertaining to: compact and sustainable urban growth; sustainable mobility and permeability; and placemaking, while significantly contributing towards climate action.
- The scheme is supported by the high-level policies in place in the Dublin City Development Plan 2022-2028

Environment and Transportation Department Comments

- Overall strong support for proposed scheme.
- Scheme will remove bicycles from bus lane and therefore improve speed of bus service.
- Dublin City Council recognises that the bus is the most important mode of public transport in Dublin and it is stated that in 2019, almost 160 million journeys were made by bus in the Dublin Region, representing 65% of all public transport trips in the Dublin area.
- It is stated that the DCC/ NTA cordon count in 2019 showed that the bus was the single highest mode of transport crossing the canal, 30% of all trips, and the bus accounted for over half of all public transport trips into the city centre.

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

Traffic Division Comments

- Supportive of the proposal and recognises the significant improvements in terms of safe cycling measures and in enabling an efficient public transportation service along the route.
- It is essential on all BusConnects corridors to ensure that the bus service is given priority.
- DCC states that links to bus information in relation to traffic flow management will be upgraded to improve this service and ensure free flow for buses. This digital improvement is necessary to ensure the scheme operates to its full potential.
- DCC have carried out modelling work to mimic the real-life operation of the project.
- It is stated that the design of this scheme is difficult and complex and has called for multiple interventions along the road network in order to achieve its objectives. The use of bus priority signals, bus gates and a combination of one-way systems and turn bans are all intended to alter the current traffic situation along the route and ensure that public transport, walking and cycling can be prioritised over the private car.
- "Watering down" the benefits of the scheme by making localised changes to the design is not recommended.
- Camera based bus lane enforcement will need to be rolled out.
- The enhanced data garnered by DCC from the next Generation AVL system and the next generation Bus priority system currently being specified will play a key role in how the corridor is dynamically managed to ensure that the bus journey times and headways are met.
- Digital infrastructure along with the proposed civil infrastructure for traffic signals are both required for the corridor to meet its objectives.

Road Division Comments

- The Roads Department is generally supportive of the scheme and its intention to improve bus and cycling provision.

- Scheme should seek to ensure sufficient and appropriate footpath widths of minimum 2 m and seek to improve pedestrian connectivity to bus stops and ensure pedestrian priority for people with accessibility issues incl visual impairments.
- Ensuring pedestrian priority is important particularly in the context of people with accessibility issues including visual impairments. Pedestrians, in accordance with all levels of policy, should be ensured priority through signage and other appropriate measures.
- The extent of loss of loading bays is not clear.
- Reallocation of kerbside space for loading and servicing to buses and cyclists needs to take account of the general functional operation of the city and to the achievement of the 15 Minute City where people can walk and cycle to local shops and services.
- Safeguarding the ability of local services to operate is imperative.
- There is concern regarding inadequate loading provision in busy commercial areas such as Rathmines and City Centre streets such as George's Street.
- The drawings make reference to new 3.6m wide driveways for residential properties whereas the maximum permissible width in accordance with Dublin City Development Plan 2022- 2028 is 3m.
- The traffic management proposals brought forward, which provide for long stretches of one-way traffic and long stretches with banned right turns, may give rise to rat running through residential areas.

Environmental Protection Division

- It is stated that the principles of Sustainable Drainage Systems (SuDS) should be integrated with all other environmental aspects of the project, using best practice solutions.
- It is stated that the development must comply with the Greater Dublin Regional Code of Practice for Drainage Works.
- Enclosed drainage channels such as slot drains or "ACO" drains are not acceptable.
- Hybrid gullies are not acceptable.
- The use of narrow profile gullies is welcome.
- It must be confirmed that the development has been designed such that risk of flooding has been reduced as far as is reasonably practicable.

- The proposal must demonstrate that it passes the three stages of the SFRA Justification Test, particularly for fluvial flooding.
- New compensatory SuDS measures should be close to any green areas lost.
- With respect to the Wastewater Framework Directive: The report notes that the developer shall provide an evidence-based assessment of the impact, if any, of the proposed scheme on the water quality status of both rivers within the curtilage of the proposed project, including both ecological and chemical status.

Archaeology Section Comments

- Project runs through the Zone of Archaeological Constraint for a Recorded Monument listed on the Record of Monuments and Places –
 - DU0IS-020 (Historic City) from Camden Street Lower until the termination of the scheme at Dame Street.
- It is noted that the proposed scheme traverses the Historic City as depicted in the Dublin City Development Plan (Map L)
- There are two recorded archaeological monuments along the Terenure Road North to Charleville Road section of the Proposed Scheme, comprising Rathgar Castle and its associated Gateways.
- Conditions are recommended including the appointment of a project archaeologist as a member of the NTA project team to oversee all archaeological aspects of the project from inception to completion.

Conservation Department Comments

- The conservation section observations set's out the relevant policies and objectives pertaining to built heritage and archaeology of the City Development Plan 2022 – 2028.
- With respect to Tree Strategy 2016 – 2020. The Conservation Section recommends that all mature and historic trees across the Bus Connects proposal and particular in close proximity to Protected Structures and within ACAs, Conservation Areas and areas zoned Z2 and Z8 in the Dublin City Council Development Plan 2022-2028 are retained and protected as far as practically possible.
- It is stated that where there is an unavoidable loss of historic trees, the NTA shall ensure that these are replaced with new semi mature trees to the satisfaction of DCC.

- The Architectural Heritage Protection Guidelines for Planning Authorities (2011) are referred to in respect of boundary features, effect on the character of a Protected Structure and the character of an ACA, effect on the character of a street and street furniture and paving.
- The Department of Culture, Heritage and the Gaeltacht - Technical Advice Series is noted. It highlights the Technical Advice Documents on Paving - the conservation of historic ground surfaces and Iron – the repair of wrought and cast ironwork should be used to guide any interventions to historic boundary railings and paving arising from the proposed works.

General Comments and Assessment of the Conservation Section

- A very thorough study of the receiving environment has been carried out.
- A 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.
- The historical background set out in the EIAR is detailed and well researched.
- Heritage structures are accurately described, and the record is comprehensive.
- DCC agrees with the findings regarding mitigation and protection measures.
- Not anticipated that there would be adverse residual impacts on the architectural heritage source.
- Directly affected boundaries include:
 - 74, 76 and 78 Terenure Road East (DCC RPS 8118, 8119, 8121), 59 to 69 Terenure Road East (DCC RPS 8106, 8107, 8109, 8111, 8113, 8116) and 50 to 62 Terenure Road East (DCC RPS 8097, 8099, 8101, 8103, 8105, 8108)
- The proposed paving works at Cranford Lodge on Rathgar Road (DCC RPS 7093) and the land take at 48 Harrington Street (DCC RPS 3619) may also indirectly impact the gates and railings. No works are proposed to these features but there is potential damage during construction.
- There is a potential for indirect physical impact to high sensitivity nationally important protected structures. Within the Dublin City Council area, these include 21 Aungier Street (RMP DU018-020184), 20 Aungier Street (RMP

- DU018-386), 10 and 10a Aungier Street (RMP DU018-385), 9 and 9a Aungier Street (RMP DU018-384).
- It is also outlined that there is the potential for damage during construction to the South City Markets (DCC RPS 3214 to 3223).
 - Bus shelters to be erected at four protected structures. Shelters are proposed at 12 Terenure Road East {DCC RPS 8063}; 78 Rathgar Road (DCC RPS 7072); 153 Rathgar Road (DCC RPS 7120); and 46 Rathgar Road (DCC RPS 7046).
 - Proposed kerb realignments at 48 Harrington Street & 12 Camden Street Upper, 61 - 73 Camden Street Lower, 83-87 Camden Street Lower and on the east side of Redmond's Hill will directly impact granite kerbs on the west sides of Camden Street Upper (CBC1012BTH249), and Camden Street Lower (CBC1012BTH256) and on the east side of Redmond's Hill (CBC1012BTH332). The removal of the kerbs will carry the potential risk of loss or damage.
 - Report details non-protected structures and their settings.
 - Report sets out ACA's and Conservation Areas (CA)
 - South Great Georges Street ACA
 - Grand Canal CA,
 - Richmond Street to Aungier St CA, and
 - Dame St CA.
 - The installation of paving is described as carrying a risk of accidental damage to Protected Structures and other heritage buildings or their boundary treatment during construction phase.
 - Designed landscapes are also identified as an area of indirect construction phase impact.
 - Industrial Heritage Sites:
 - There are 13 Industrial Heritage sites identified in the study area. Four of these are Protected Structures. These include Pearse Bridge (RMP DU022044002, DCIHR 220700201) and St. Pancras works {DCC RPS 5686, DCIHR 220303501}, Grand Canal House (DCC RPS 8721, DCIHR 181504001), South City Markets (DCC RPS 3214 to 3223, DCIHR 181116601).
 - A further two were also identified in the NIAH Building inventory. The Circular Line of the Grand Canal itself has not been assessed by

NIAH, but its features such as La Touche Bridge (NIAH 50110273), Canal Locks {NIAH 50110274} and Grand Canal Dock {NIAH 50020499} are rated as being of Regional Importance by the NIAH.

- Repositioning of granite paving is noted.
- Street Furniture:
 - Post boxes, lamp posts, coal hole covers are detailed and considered.
 - Careful consideration shall be given to the siting of associated utilities and traffic management signage. Signage should be kept to the necessary minimum.

City Architects Department comments:

- Welcomes the proposal in principle.
- The design of the public realm will be fundamental to the success of the Proposed Scheme.
- Footpaths should be designed to be universally accessible and pedestrian environments enhanced.
- All historic fabric and features should be retained and protected, and the settings of protected structures and buildings within Architectural Conservation Areas (ACA's) should be respected insofar as possible.
- The reconfiguration of the junction of Rathmines Rd and Rathgar Rd creates an opportunity for place-making but the footpaths in the commercial village area are reduced in width by the proposed scheme or the existing width is maintained.
- The footpath on the east side of the commercial area of Terenure Village (Sheet 19) and Camden Street (Sheet 16) are also reduced in width by the proposed scheme.
- The proposed cycle path will impact on the existing character of the streets therefore the width of the cycle path should be reduced to the minimum.
- Sheet 34 & 35, Volume 3, Figures, Part 1, Chapter 4.3 General Arrangement drawings, show a 2-way cycle route along the existing footpath in Bushy Park, reducing the pedestrian footpath to 1.5metres in width. This is the main path in the public park and 1.5metres is not a sufficient width to accommodate pedestrians along this busy pedestrian route.

- By condition, confirmation is requested that pedestrian traffic counts have been undertaken to ensure that the proposed footpath widths along the Proposed Scheme are sufficient to cater for anticipated pedestrian volumes. This confirmation should be submitted to the planning authority prior to commencement of development.
- By condition, detailed drawings and specifications of the proposed public realm improvement scheme at Rathgar Village & Rathmines Village shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.
- By condition details of all landscaping and public realm finishes in areas where they are to be taken in charge shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.
- By condition, full details of the design and type of each bus shelter for each location shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.
- Condition required re siting of all utility cabinets and other above-ground utility infrastructure.
- Condition required re: EV charging.
- Condition required re palette of materials for proposed hard landscaping and hard landscaping to be retained.
- Condition required re palette of street furniture and boundary treatments.
- Condition required re water drinking fountains, street trees and planting, gantry signage and traffic signals and village signage.

Parks Department Comments:

- The proposed scheme is supported and welcomed.
- Consider that it generally accords with European, National and Local policies and requirements and is supported by the City Development Plan 2022 – 2028.
- Suggest that in the event that the Board is satisfied that permission be granted subject to conditions.
- It is recommended, that consistent with the cycletrack treatment along the rest of the Templeogue Road, the cycletrack along Bushy Park should be incorporated into the bus lane.

- Where the pavement is sufficiently wide at Bushy Park denoted as ‘share with care’, it is considered that this is sufficiently wide.
- The proposed new gravel footpath through the tree lined open space at Rathdown Drive should not be constructed as it would impact upon tree routes.
- There is no issue with constructing footpaths across the linear open space to serve bus stops on Templeogue road from Rathdown Drive however the detail of these will need to be agreed with the Parks, Biodiversity and Landscape Services team of DCC.

Overall Recommendation / Conditions

- Appendix 1 of the DCC report sets out agreed conditions between NTA and DCC. In respect of:
 - Handover: Comprehensive agreement of handover to NTA and hand back process.
 - Consultation between Departments.
 - Design
 - Reinstatement
 - Construction period.
 - Miscellaneous: Cellars
 - Public Lighting
 - Environmental Protection: Drainage
 - Air & Noise Pollution
 - Archaeology
 - Conservation
 - Architecture

2. South Dublin County Council

- Generally, in favour of the proposed development.
- Supportive policy context.
- There are 2 relatively short sections of the proposed scheme located within South Dublin County Council Local Authority Area.
- The proposed scheme will support efficient and intensive use of brownfield serviced urban sites, sustainable and vibrant communities, as well as housing delivery.

- The proposed scheme will provide a good balance between servicing existing communities while not seriously and adversely effecting residential amenities, given its proposed routing.
- The proposed scheme is also delivering on the wider remit of smarter travel given proposed improvements to walking and cycling infrastructure.
- Issues such as tree loss and the loss in carriage width dedicated to cars are decisively outweighed by improved sustainable transport opportunities, enhancement of the public realm and knock-on increase in the scope to accommodate higher-density development in the vicinity of this serviced/route.

Traffic and Transportation Section Comments:

- The proposed scheme is supported and welcomed.
- The scheme supports the National Development Plan, RSES, and the Transport Strategy for the Greater Dublin Area, (2022- 2042).
- The core bus corridor scheme supports the actions contained in the latest Climate Action Plan 2023.
- The traffic and transportation and section welcome the conversion of the Spawell roundabout on the R137 to a traffic-light controlled junction with marked improvements for bus priority, and active travel movements.
- Welcomes preservation of amenities.
- Sets out comments on specific sections of the scheme.
- Note significant negative feedback in relation to the Nutgrove Avenue /Grange Road set back of the existing wall and possible loss of mature trees.
- Significant mitigation measures are required to make up for the loss in biodiversity at this location.
- Traffic signal timings need careful consideration.
- If no alternative to the proposed temporary compound on Woodview Cottage Green public open amenity space can be identified, then the NTA should improve its amenity value as compensation for its temporary loss to residents.
- Need complete clarity on what land will become public realm after the scheme is completed and the maintenance implications of such lands.

- The comments provided are mainly focussed on the construction management controls and minor design details of the scheme.
- Many concerns have already been addressed through the extensive consultation process that has been conducted by the NTA

Parks Department Comments:

- The proposed scheme is supported and welcomed.
- The loss of trees and low level / dearth of proposed new street trees impacts upon the delivery of smarter travel solutions and creation of climate – adapted streets.
- Low level of proposed tree planting is a concern.
- Concern of estimated tree loss within Rathfarnham Castle Park.
- The proposal does not replace the trees lost.
- Concern that the magnitude of change in the baseline environment is very high.
- Further assessment is required with regard to the proposals along and within the boundary of Rathfarnham Castle Park.
- The tree survey and report should be reviewed to include all trees impacted by the proposals, the topographical survey should be reviewed to ensure trees are accurately positioned and to ascertain the feasibility / likely success of any proposed no-dig proposals.
- The arboriculture impact assessment should undertake a realistic assessment of the proposed works on existing trees, including the review of all levels and services proposals. Co-ordination between the various design disciplines will be required to minimise impact on existing trees.
- Recommend that sufficient replacement woodland be agreed with SDCC
- Recommend that the project include natural based urban drainage systems such as rain gardens, swales SuDs Tree pits in accordance with SDCC's Guidelines for natural based drainage policies.
- Construction Compound TR1: Permanent CPO of lands for construction compound at Spawell should not be permitted and is unnecessary.
- Construction compound TR3 between Dodder view road, Woodview Cottages and Church Lane is close to a site of an existing time limited temporary construction compound where SDCC have agreements re full

- reinstatement of the compound. Recommend that the extent of the compound be limited to the existing compound location on site.
- Construction compound TR6: To be located on Spawell Link Road – SDCC do not recommend ceding of this important location with a temporary CPO.
 - Recommend that a CPO of lands at junction of Grange Road with Nutgrove Avenue not be granted.
 - Recommend that a CPO of lands from the Rathfarnham Castle Park car park is not granted.
 - Query the need for permanent CPO of lands at the junction of Rathfarnham Main Street and Rathfarnham Road.
 - The extent of permanent CPO at Pearse Bridge is extensive and excessive.
 - A stone wall, reflecting the type of stone used in the vicinity should be reinstated along the boundary with Rathfarnham Castle Park to better reflect the current context of the castle and the grounds.
 - Impact of proposal upon ecology and biodiversity within Rathfarnham Castle Park and at Piers Bridge should be further reviewed.
 - Feasibility of proposed street tree planting is raised as an issue. There is a requirement for feasible street tree planting proposals.
 - Sets out pertinent policies and strategies of the SDCC County Development Plan 2022 – 2028.

Water Services Section Comments:

- Sets out the minimum separation distances from proposed building to surface water sewers.
- The set back distances for foul and water should be as per Irish Water standards.
- The riparian corridors of the County are important. Development within or affecting riparian corridors are required to meet the criteria specified in Section 12.4.3

Architectural Conservation Section Comments:

- SDCCs Architectural Conservation Officer has been involved in discussions regarding the proposed route and the different options

presented by ARUP in relation to the proposed scheme. In particular lengthy conversations and meetings have taken place in relation to two Protected Structure sites within SDCC, The Gothic Arch at Templeogue (RPS Ref. 244) and Rathfarnham Castle (RPS Ref. 221

- Request that a Visual Impact Assessment is provided with regard to the proposed boundary wall at Rathfarnham Castle Park.
- The EIAR completed for the Bus Connects Scheme Route (Templeogue/Rathfarnham to City Centre) includes a very detailed and comprehensive overview of Protected Structures and Architectural Conservation Areas and Architectural features/items located within the vicinity of the proposed route.
- The proposed works to include the conservation and repair of the Gothic Arch are welcomed along with the overall public realm design works ensuring the Arch is integrated into the design allowing it to be fully appreciated within the current landscape.
- A Schedule of Works and Method Statement for the proposed repair works to the Gothic Arch, Protected Structure RPS Ref. 244, should be submitted for formal agreement and approval with SDCC Architectural Conservation Officer prior to the commencement of works. Agreed works should be carried out by suitably qualified conservation contractor.
- Sets out a detailed approach for the Rathfarnham Castle Wall replacement.
- Potential Impact has been identified with regard to possible damage during construction phase, it is therefore considered that details are required by way of a safety statement and associated method statement in addressing this particular concern.

General Comments:

- Avoid and over engineered approach.
- Adherence to principles of universal design.
- Insure adequate greening.
- Supplementary nature – based SUDS features are warranted.
- Tying in with other proposed infrastructure incl. underground utilities and SDCC's Active Travel and Cycle South Dublin proposals.

- Consideration to be given to operation of construction compounds on SDCC lands by agreement rather than by temporary CPO. SDCC is best placed to manage issues around these compounds because of its local knowledge and existing relationship with local communities. An Bord Pleanála is advised SDCC hereby offers its consent for the temporary use of its lands as construction compounds as identified and delineated to the submitted drawings by the NTA or its agents for these delivery of these proposals by agreement.
- Detailed Construction Management Plans (CMP) are necessary.
- Prior to commencement of works, the Bus Connects Project Team should contact SDCC Architectural Conservation Officer.
- Safety and method statements sought by compliance in relation to areas referenced by the Architectural Conservation Officer.
- More green infrastructure, tree planting and hedge retention should be secured along the full length of the route in particular to avoid streets where no trees are planted and to ensure mitigation where trees and hedgerows are to be removed.

3. Transport Infrastructure Ireland (TII)

No observations to make.

4. Department of Housing, Local Government and Heritage - DAU

- Due to proximity of the scheme to Rathfarnham Castle (RMP DU022-014; NM628; PO2/1986) which is a National Monument in state ownership and subject to statutory protection, all works associated with the proposed scheme at the boundary of the NM will require Ministerial consent under section 14 of the National Monuments (Amendment) Act 1930 – 2014. This can be dealt with by way of condition.
- 5 no. conditions with respect to archaeology are recommended, they relate to:
 - Mitigation measures set out in the EIAR
 - CEMP
 - Project Archaeologist to be appointed.
 - Ministerial consent for all works at or in the immediate proximity to Rathfarnham Castle

- Archaeological monitoring and any investigation work / excavation required.

4.2. NTA Response to Prescribed Bodies

1. Response to Dublin City Council

- It is noted that the proposed Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme is supported and welcomed by Dublin City Council.
- 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.
- The NTA notes that DCC's Traffic Department recognised that the 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.
- It is not considered that the proposed development would have a negative impact on the North-West Irish Sea candidate Special Protection Area (cSPA, site code 004236).
- The NTA welcomes DCC's comments in relation to the importance of considering the pedestrian/cyclist interaction at bus stops and notes that the EIAR Chapter 4, Proposed Scheme Description Appendix A4.1 Preliminary Design Guidance Booklet (PDGB) for BusConnects Core Bus Corridor Section 11, sets out the key measures to address the concerns raised in relation to vulnerable users at these locations which is further elaborated in Section 4.14 of the Preliminary Design Report in the Supplementary Information.
- The Proposed Scheme will increase the number of controlled pedestrian crossings from 76 in the Do Minimum to 106 in the Do Something scenario, equating to a 39% increase. Additionally, there will be an increase in the number of raised table crossings on side roads from 30 in the Do Minimum to 105 in the Do Something scenario, equating to a 250% increase.
- The Proposed Scheme proposes to increase footpath widths at critical locations with high pedestrian demand, such as on Rathmines Road Lower and in Terenure Village.

- Measures proposed 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.
- 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 which are actuated by bus detector loops in the bus lane. The exit taper for the bus stop has been nominated at 1 in 3 to provide for a gradual transition to the cycle track.
- 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.
- The Proposed Scheme will formalise the parking arrangements to improve facilities for pedestrians and cyclists. Given the availability of equivalent types of parking along adjacent streets within 200m of these locations, the overall impact of loss of parking is considered to have a Negligible to Low Negative effect overall along the Proposed Scheme. This effect is considered acceptable in the context of the aim of the Proposed Scheme, to provide enhanced walking, cycling and bus infrastructure on this key access corridor.
- Parking and loading facilities, including disabled parking bays, have been retained in critical areas, such as in Terenure Village, on Rathmines Road

Lower, Camden Street, and on South Great George's Street. It is further noted that increased provision of cycle parking is proposed as part of the Proposed Scheme. A large number of these proposed cycle parking facilities will be located close to urban villages and areas of commercial activity such as on in Terenure Village, in Rathmines and on Camden Street.

- The NTA commissioned a report to assess the economic impact of the infrastructure works, which was based on international published evidence (EIAR Volume 4 Appendices Part 3 of 4 Appendix A10.2 The Economic Impact of the Core Bus Corridors). The evidence examined indicates that the removal of parking spaces is unlikely to have a negative impact on businesses.
- Through the very positive and constructive liaison relationship with the DCC BusConnects Liaison Office throughout the design and planning process there has been consultation with the DCC Roads Department in regard to necessary changes to the Pay and Display parking and associated infrastructure to ensure adequate set down/loading for potentially impacted commercial units.
- The Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Roads Department inputs regarding Pay and Display parking and associated infrastructure for set down/loading for potentially impacted commercial units as these matters were the subject of extensive liaison throughout the design development process.
- DCC make reference to the proposed traffic management proposals, which include long stretches of one way traffic and long stretches with banned right turns, which DCC assert may give way to rat running through residential areas. As detailed in Chapter 6 of the EIAR, extensive network level traffic modelling has been carried out to determine the redistribution effect on traffic of the proposed traffic management measures. Mitigation measures have been put in place to prevent rat running through residential areas.
- Where practicable, 2.0m wide cycle tracks have been provided along the route of the Proposed Scheme. It is noted that the proportion of segregated cycle facilities along the route will increase from 28% to 85.4% following the implementation of the Proposed scheme, resulting in significantly enhanced cycle facilities along this important link.
- It is acknowledged that due to significant constraints in available width along the route, that in some locations, cycle facilities of a narrower width than the

desirable minimum of 2.0m have been proposed, including on Rathfarnham Road, Rathgar Road, Camden Street Lower and on Templeogue Road.

- With respect to the issue of trees within the footpath obstructing a desirable footpath clear width of 2.0m, it is noted that 'Building for Everyone: A Universal Design Approach', notes that over short distances (<2m) a reduced footpath width of 1.2m is feasible.
- 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. Details regarding temporary access provisions will be discussed with residents and business owners 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.
- With respect to parking and loading bay widths, in particularly constrained locations, where existing parking bays are being retained, it is proposed to maintain the existing parking bay width, noting that in some cases this may result in parking bays which are narrower than the desirable minimum width of 2.1m.
- The preferred design for priority junctions at side roads along the Proposed Scheme, includes for a continuous footpath and cycle track crossing of the side road on a raised entry treatment. In lieu of a more traditional ramp, it is proposed to provide a step level change between the carriageway and the cycle track through the provision of a splayed kerb. A second splayed kerb will be provided between the cycle track and the footpath. A ramp will be provided at the back of the proposed footpath to ramp back down to carriageway level on the side road and will be marked in accordance with standards (sharks teeth markings).
- With respect to the matter of sightlines, an assessment of visibility at major and minor junctions has been completed along the route. In accordance with DMURS, the SSD parameters for relevant design speeds has been adopted as the Y-Distance visibility to be achieved while an X-Distance of 2.4m (reduced to 2.0m as a relaxation) has been implemented.
- For the Core Bus Corridor Infrastructure Works it is proposed that bus stops should be preferably spaced approximately 400m apart on typical suburban sections of route, dropping to approximately 250m in urban centres.

- The heritage features which are highlighted for retention within the footpath consist of heritage granite paving/kerbing and heritage lighting columns. Paving and kerbing is to be incorporated into the proposed footpaths, so will not create pinch points. Heritage lighting columns are proposed to be relocated where their existing position would create a pinch-point.
- With respect to left turn to merge road markings in the bus lane on approach to a number of junctions, the NTA response sets out that taxis and other bus types wishing to turn left will need to exit the bus lane and merge with general traffic in advance of the stop line. In some cases, a separate left-turn lane may be provided with a red signal while other straight movements progress on a green signal. Designers should specify appropriate road markings and signage to inform road users of the requirement for taxis and buses to merge with general traffic to turn left.
- With respect to the accessible parking bay at Castlewood/Rathmines Road junction. The NTA understands that this comment refers to the accessible parking bay on Rathmines Road Upper outside of number 2 Rathmines Road Upper. This accessible parking bay is proposed to be retained in its existing location.
- With respect to the bus stop cage at 42 Richmond Street. It is submitted that the proposed bus stop layout in this location is a Shared Bus Stop Landing Zone arrangement. This option provides a cantilever bus shelter adjacent to the carriageway, to maintain access to frontages at the back of the footpath. Given the presence of a number of business frontages along Richmond Street, the offset bus shelter is considered the most appropriate design response, which provides a bus shelter for waiting passengers without impacting on adjacent businesses. The bus shelter has been placed downstream of the bus stop location to ensure waiting passengers have sufficient visibility to see approaching buses.
- With respect to emergency access on Lennox Street. It is submitted that the proposed cul de sac has been checked for emergency access requirements. It is noted that access to Lennox Street will remain feasible via Synge Street and other side streets connecting to Harrington Street. Richmond Row is in close proximity to the proposed modal filter on Lennox Street, and this road provides a facility for emergency vehicles to turn about if necessary.

- With respect to whether traffic lights will be put in place to cater for cyclists travelling east on Harrington Street and turning onto Camden Street Lower. It is confirmed that, it is proposed to provide signal control for cyclists at the Harrington Street/Camden Street junction.
- With respect to the proposed traffic shuttle system on Mountpleasant Street Upper. It is noted that a number of similar traffic shuttle systems operate within the DCC area including one on Philipsburgh Avenue in Marino and one at London Bridge on Bath Avenue in Dublin 4. It is anticipated that the proposed shuttle system would operate in a similar manner to these existing shuttle systems.
- With respect to the relocation of bus stop number 1160 – Terenure College. The NTS response states: “This location is closer to the pedestrian crossing better serving the Rathdown Area. Stop is also closer to the Terenure College Entrance.” The proposed location of the bus shelter is between two residential accesses and the NTA is satisfied that it will not adversely impact on these adjacent properties.
- With respect to the buildability of the proposed informal path proposed adjacent to Rathdown Park, noting the presence of tree roots in this area. The NTS response states that it is proposed to utilise no-dig construction method for this proposed path in order to minimise the impact on the adjacent tree roots. The Arboricultural Impact Assessment carried out on the Proposed scheme is included in Appendix A17.1 within Volume 4 Appendices: Part 4 of 4. This assessment has considered the potential impact of the Proposed Scheme on the existing trees within the area. The trees requiring removal are clearly identified on the Tree Protection Plan drawings included in Appendix C of the report, as well as documented within the Tree Survey Schedule in Appendix A. The assessment has concluded that the existing trees in this location will not be impacted by formalisation of the path in this location.
- With respect to the viability of the proposed bus shelter outside of 93 Templeogue Road, the NTA response states that it is proposed to widen the existing footpath in this location to approximately 2.2m width. As such, the design team is confident that there is sufficient width in this location to provide the bus shelter as proposed.

- With respect to protected structures and their settings the NTA response acknowledges the importance of protected structures and their setting and note DCCs comments in relation to the number of protected structures present on Terenure Road East and Rathgar Road. These protected structures have been noted and assessed in Chapter 16 of the EIAR.
- Indirect physical Construction Phase impacts are anticipated in six locations, where Protected Structures of National Importance and High Sensitivity share a boundary with the Proposed Scheme. These include:
 - Rathfarnham Castle (RMP DU022-014),
 - 21 Aungier Street (RMP DU018-020184),
 - 20 Aungier Street (RMP DU018-386),
 - 10 and 10a Aungier Street (RMP DU018-385),
 - 9 and 9a Aungier Street (RMP DU018-384) and
 - the South City Markets (DCC RPS 3214 to 3223).
- There is potential for damage during construction. The pre mitigation Construction Phase impact is identified as Indirect, Negative, Significant and Temporary. The proposed mitigation is the recording, protection and monitoring of the Protected Structures 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 the EIAR, reducing the magnitude of the risk from medium to Low. The predicted residual Construction Phase Impact is Indirect, Negative, Slight, Temporary.”
- With respect to direct impact of works to a number of boundaries to Protected Structures during the Construction phase. Specifically, the following locations:
 - 74, 76 and 78 Terenure Road East,
 - 59 to 69 Terenure Road East and
 - 50 to 62 Terenure Road East.

It is noted that the land acquisition at front boundaries of some protected structures will require the deconstruction and relocation of boundary walls and entrance gates, as well as a permanent impact on mature gardens and trees.

- The NTA notes the following mitigation measures proposed. The recording of the existing boundaries in position prior to the works, labelling the affected masonry, brickwork, railings, gates, gate posts, capping stones prior to their careful removal to safe storage, and their reinstatement on new lines, which 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 the labelling, taking-down and reinstatement of the affected gates, railings, piers, bricks and masonry. 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 the EIAR.
- DCC notes that where boundaries to protected structures are to be impacted in this manner that they shall be reinstated at setback location, pending agreement on more detailed design with the Planning Authority's Conservation Section and having regard to the provisions of the Architectural Heritage Protection Guidelines for Planning Authorities (2011) and the relevant DHLGH Advice Series publications.
- The NTA welcomes the positive engagement with the DCC Conservation Section 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.
- The NTA response sets out that there is no works proposed to Cranford Lodge on Rathgar Road and 48 Harrington Street, both Protected Structure's, but are cognisant that there is potential for damage of these features during construction. Mitigation is again highlighted.
- The NTA response sets out that bus shelters are to be erected at four protected structures, namely 12 Terenure Road East, 78 Rathgar Road, 153 Rathgar Road and 46 Rathgar Road. This is noted in the EIAR as follows:
 - 12 Terenure Road East (DCC RPS 8063);
 - 78 Rathgar Road (DCC RPS 7072);
 - 153 Rathgar Road (DCC RPS 7120); and
 - 46 Rathgar Road (DCC RPS 7046).

- All four buildings are Protected Structures of Regional importance and of medium sensitivity. It is submitted that the magnitude of impact of the Bus shelters will be low as in each case the Protected Structures are set back from the road behind existing, or in the case of 78 Rathgar Road (DCC RPS 7072) a reinstated boundary treatment, limiting the visual impact of the proposed bus shelters. The potential Operational Phase impact is considered Indirect, Negative, Slight, Long-term visual impact.
- The NTA acknowledge that bus shelters are proposed at non-protected structures of regional and local importance including:
 - 190 Rathfarnham Road which is of Regional Importance,
 - 59 Rathfarnham Road which is of local importance,
 - 3 Rathfarnham Road which is of local importance,
 - 34 Grosvenor Place which is of Regional importance and
 - 32 Camden Street Lower which is of Regional importance.

The impact is documented and assessed in the EIAR as follows: ‘Magnitude of impact is Low as these architectural heritage structures will be set back from the road behind their boundary treatments which will limit the visual impact of the shelters. The potential Operational Phase impact is Indirect, Negative, Slight, Long-term visual impact on the structures.’

- The NTA acknowledge the proposed kerb realignments at 48 Harrington Street and 12 Camden Street Upper, 61-73 Camden Street Lower, 83-87 Camden Street Lower and on the east side of Redmond’s Hill will directly impact granite kerbs on the west sides of Camden Street Upper and Camden Street Lower and on the east side of Redmond’s Hill. The magnitude of impact is described as High. The potential Construction Phase impact is described as Direct, Negative, Significant and Temporary.
- The NTA have noted the non-protected structures and their settings (such as coal holes and subterranean cellars), raised by DCC. It is submitted that structures/sites in close proximity to construction works are to be adequately protected and all proximate works are to be supervised by a conservation professional.
- South Great George’s Street ACA, Conservation areas (CAs), Designed Landscape, Industrial Heritage Sites, Paving, Signal Poles and Street Furniture

located within the route of the bus corridor, including the Grand Canal CA, the Richmond Street to Aungier Street CA and the Dame Street CA are all noted and impacts are assessed, justified and mitigated against in the response submitted.

- It is noted that changes in the alignment of the footpaths and proposed paving treatments will be in close proximity to 109 paving and surface treatments. These include granite kerbs, cellar lights and grilles, granite paving, cobbles, coal holes and areas of Regional Importance and Medium Sensitivity.
- Issues with respect to footpath width, local public realm improvement schemes, land acquisition and taking in charge, bus shelter design, siting of utility cabinets and above ground utility infrastructure and on street parking palette of materials, palette of street furniture, boundary treatments, Per cent for Arts Strategy, public drinking water fountains, new street trees, traffic signal poles, gantry signage and village signage are all responded to and justified in terms of the proposal submitted.
- With respect to attachment of proposed conditions the NTA response regarding how the corridor is to be handed over sets out that 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.
- Regarding cost of maintenance 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.

- With respect to consultation with DCC departments into the final detailed design of the scheme. 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.

2. Response to South Dublin County Council

- The support for the scheme is noted and welcomed by the NTA.
- The NTA notes and welcomes the support for the proposed junction improvements at the Spawell roundabout.
- The NTA notes and welcomes the support for the proposed preservation of the existing stone arch on Templeogue Road. The NTA also acknowledges the extensive consultation which SDCC has facilitated in relation to this proposal.
- Where sufficient space allows, Island Bus Stops are the preferred bus stop option for the Proposed Scheme.
- The alignment of the cycle track at the Springfield Road Junction has been designed to retain the existing mature trees in this location where practicable. The NTA is satisfied that the cycle track as designed will provide a high level of service for cyclists.
- The NTA notes SDCCs comments in relation to the removal of an existing general traffic turning lane at the junction of Rathfarnham Road and Butterfield Avenue. This general traffic lane is proposed to be converted to an inbound bus lane, to provide priority for inbound buses on approach to this junction, in line with the objectives of the Proposed Scheme.
- In relation to the potential for impact on the surrounding road network, extensive traffic modelling has been undertaken, to determine the likely impacts of the Proposed Scheme on the surrounding road network.

- The Construction Compound locations have been selected due to the amount of available space, their relative locations near to the majority of the Proposed Scheme major works and access to the National and Regional Road network. Following completion of the construction works, the Construction Compound areas will be cleared and reinstated to match pre-existing conditions.
- At Specimen Design stage, the selection of appropriate pavement materials will be made.
- Significant efforts have been made during the design process to minimise above-ground utility infrastructure/ signage where practicable. Where such infrastructure is necessary, it has been sited in appropriate locations, and rationalised where practicable.
- The NTA anticipates continuing its collaboration with SDCC 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.
- Accessibility for mobility impaired users is a core element of the Proposed Scheme design.
- The NTA notes the concerns raised by SDCC in relation to the proposed tree removal within Rathfarnham Castle Park to facilitate the proposed improvements to bus priority and cycle infrastructure in this area. It is acknowledged within the EIAR that there is a significant impact on existing trees in this location. It is noted that considerable consultation has been undertaken on the proposals in this area with SDCC, the OPW, Dept. of Housing, Local Government and Heritage and this is acknowledged within the SDCC submission.
- Rathfarnham Castle Park is a densely wooded area with hundreds of existing trees. It would not be practicable as part of the assessment of the Proposed Scheme to survey every tree within the park. As such, the tree survey has only documented trees within the zone of influence of the Proposed Scheme. The methodology by which the Tree Survey was carried out is documented within Section 1.2 of the Arboricultural Impact Assessment Report, which is included as Appendix A17.1 in Volume 4 of the EIAR.
- It is acknowledged that there will be a change at Rathfarnham Castle, a National Monument and Protected Structure, most notably there will be

continuing adverse effects from loss of land and from trees removed during the Construction Phase. However, there will be provision of substantial tree planting to consolidate the woodland edge to the demesne, which will reduce the negative effects over the long-term. The provision of a new cohesive boundary wall in a material sympathetic to the construction of the castle itself will be a positive impact. Overall, the effect will be initially negative in the short-term becoming neutral over the long-term. The sensitivity is high and the magnitude of change is high. The potential townscape / streetscape and visual impact of the Operational Phase on Rathfarnham Castle is assessed to be Negative, Significant and Short-Term becoming Neutral, Moderate / Significant and Long-Term.

- The NTA design team is confident that the trees marked for retention can be retained.
- With respect to necessity of the CPO of public lands for construction compound use. The NTA response states that 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 SDCC as the relevant road authority is automatically restored.
- In relation to the proposed CPO at the existing exit of Rathfarnham Castle Car Park, it is proposed to realign this access to provide a safer environment for pedestrians and cyclists.
- There is evidence of bats foraging and commuting within the study area of the Proposed Scheme, particularly along the River Dodder at Pearse Bridge in Rathfarnham (CBC1012BT002) and adjacent Bushy Park (CBC1012BT003). All parts of the Proposed Scheme which contain suitable habitat are likely to be within the Core Sustenance Zone (CSZ) of at least one bat roost. Considering the type of works proposed (e.g., upgrading of existing infrastructure for the most part), there is limited potential for the Proposed Scheme to act as a barrier to flight paths for bat species, as there will be no major changes to pre-existing habitats along most of the route.
- The NTA notes that a total of 169 existing trees are proposed to be removed with a total of 400 new trees proposed to be planted. This equates to a net increase of 231 trees. Within the SDCC area a total of 114 trees are proposed to be removed with 326 new trees proposed to be planted. This equates to a net increase of 212 trees.

- In relation to the feasibility of tree planting, new street trees have only been proposed where there is sufficient footpath width to accommodate them.
- Preliminary consultations have been undertaken with utility asset owners, including Irish Water, so that conflict can be resolved by relocating or diverting services where necessary and protecting in-situ where appropriate.
- The riparian corridor referred to in the submission relates to the River Dodder. The NTA is satisfied that the relevant policies, objectives and criteria referenced in the SDCC Development Plan 2022 – 2028 have been considered in the development and assessment of the Proposed Scheme.
- In relation to the Gothic Arch in Templeogue, the NTA welcomes SDCC's support for this important element of the Proposed Scheme. In relation to Rathfarnham Castle, the NTA again welcomes SDCC's comments in this regard. The NTA is satisfied that 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.
- The NTA notes the request that a Schedule of Works and Method Statement for the proposed repair works to the Gothic Arch should be submitted for formal agreement and approval with SDCC Architectural Conservation Officer prior to the commencement of works.

3. Response to DAU

- As part of the EIAR, a CEMP has been prepared for the Proposed Scheme and is included as Appendix A5.1 in Volume 4 of the EIAR. The CEMP will be updated by the NTA prior to finalising the Construction Contract documents for tender, so as to include any additional measures required pursuant to conditions attached to An Bord Pleanála's decision. The CEMP comprises the construction mitigation measures, which are set out in the EIAR and NIS. All of the measures set out in this CEMP will be implemented in full by the appointed contractor and its finalisation will not affect the robustness and adequacy of the information presented and relied upon in the EIAR and NIS. Chapter 15 in Volume 2 of the EIAR sets out the archaeological baseline in which the Proposed Scheme is located, assesses the potential for archaeological impacts as a result of the Proposed Scheme and sets out the mitigation measures which will be implemented.

- The NTA intend to fully comply with the requirements of Section 14 and 14A of the 1930 act to obviate the need for the type of condition proposed by DAU at Point No. 4 of their submission.
- It is the intention of the NTA that liaison continues with the relevant bodies including the Department of Housing, Local Government and Heritage and the conservation departments of SDCC / DCC in advance of, and during, the subsequent construction stage of the Proposed Scheme.

4. Response to TII

Transport Infrastructure Ireland has no specific submissions to make in relation to the Proposed Scheme.

Noted.

4.3. **Third Party Observations**

284 no. third party submissions have been received and are summarised within Appendix 1 of this report, 29 of which have requested an Oral Hearing. The PA's submission and prescribed bodies are additional. In the interest of conciseness, I refer the Board to this appendix should they wish to examine individual submissions. In relation to the content of the submissions it is of note that many issues raised are common to all of the submissions. For example:

- Query the need and justification for the project.
- Query the reliability of the traffic modelling, data counts and up to date nature of the information.
- Concern of traffic safety, redistribution of traffic to surrounding roads, congestion for local residents, longer journey times, loss of on-street car parking.
- Concern of noise and pollution, anti-climate change.
- Concern of loss of trees and built heritage.
- Concern of impact upon biodiversity and wildlife systems.
- Concern of impact upon mobility impaired and elderly, roads too wide and dangerous, bus stops relocated inappropriately and further away from each other.
- Concern of impact upon urban villages of Terenure, Rathmines and Rathgar.

- Concern of impact upon businesses, community, schools, hospitals, services and amenities.
- Some 46 submission raise issues with respect to Templeogue Road (inbound bus gate, traffic management, relocated bus stops, reduction in number of buses, proposed changes to the Spawell junction)
- Some 64 submissions raise issue with respect to Rathfarnham Road (impact upon Rathfarnham Castle Park, option assessment along Rathfarnham Road, relocation of bus stops, air and noise pollution, impact upon businesses in villages, location of site compound TR3 at Woodview Cottages, issues of land use zoning, air, noise, visual impact, biodiversity, flooding, contamination, risk of pollution, construction traffic etc)
- Some 116 submission raised issue with Terenure and Rathgar (justification for corridor routing along Rathgar Road, removal of parking / loading in Rathgar and Terenure, removal of trees on TRE, impact upon heritage properties, relocation of bus stops etc)
- Some 55 submissions raise issues with respect to Rathmines (impact of proposed bus gate, need and justification for the bus gate, hours of operation, traffic dispersion to surrounding roads, proposed shuttle arrangement at Mountpleasant Avenue, insufficient improvement to public realm in Rathmines).
- Some 7 No. submissions raise concern with respect to Richmond Street / Camden Street (loading bay locations, conflict with DCC plans for College Green, narrow footpaths, traffic increase, impact upon businesses, alternative options not considered such as Tram / Luas / Metro).

4.3.1. Other concerns relate to specific roads impacted by right hand turn bans, potential for indirect physical impact to protected structures and to individual properties or other elements of the scheme.

4.3.2. In addition to the foregoing the major issues raised in the various third-party submissions to the Board are summarised under broad headings below:

- General concerns with regard to the overall design and layout of the scheme in particular junction design, the design of cycling infrastructure, footpaths alterations, relocation of bus stops and changes to the alignment of the current road layout.

- Concerns regarding the transportation modelling, justification and need for the proposal (unnecessary change providing no real gains to bus travel times)
- No assessment of cumulative impact of 12 corridors.
- Concern of signalisation of Spawell Roundabout, one-way operation of Rathgar Road, compatibility with proposed College Green Scheme, proposed turn bans, removal of existing turn bans, diversion of traffic.
- Lack of public consultation
- Request oral hearing
- Pre-COVID traffic volumes used in analysis
- Alternative options not considered.
- Access to amenities impacted.
- Lack of consultation
- Proposed footpaths too narrow.
- Proposed bus gates (limit hours of operation, request exemption for residents).
- Noise and air pollution issues
- Traffic safety and access and egress arrangements from residential entrances.
- Traffic dispersion to surrounding residential streets.
- Impact on architectural and cultural heritage
- Biodiversity (tree loss, impacts upon flora and fauna)
- Visual impact
- Loss of privacy / Loss of green space and removal of planting in front gardens.
- Impact on property values
- Negative impact upon businesses

4.3.3. More specific concerns raised by individual groups along the proposed alignment included the following:

- Dublin Commuter Coalition, supports Busconnects project, however, raises issue of enforcement and enforcement cameras, continuous provision of 24/7 bus lane operation, concern of two stage pedestrian crossings, junction design for cyclists, Bus stops design, shared space and quantum of bicycle parking.
- Dublin Cycling Campaign, supports Busconnects project, raise issues with respect to National Mobility Policy targets, adherence to universal design, welcome design interventions - improved island bus stops, raise issue with regard to cycle track widths, cycle track continuity, filtered permeability, quiet street treatment and speed limits.
- Local businesses, raise issues with respect to loss of trade, impact and location of protected cycle lanes, loss of loading bays and impact upon deliveries, safety of vulnerable pedestrians and cyclists.
- Access to amenities and services in particular, Church of Mary Immaculate, Refuge of Sinners, St. Mary's R.C. School in Rathmines, Saint Louis High School, and St. Jude's GAA Club, Rathgar Medical Practice, Saint Luke's Hospital, Christchurch Rathgar car park, Meals on Wheels Rathmines and Bushy Park.

4.3.4. It is important to note at this juncture that third parties were invited to respond to the applicant's response to their submissions. A total of 119 valid additional submissions were received. Numerous submissions state that the NTA's response is insufficient to address concerns raised, they reiterate concerns of misleading modelling, out of date data and data analysis. Concern is expressed that the issue of how buses will traverse through the city centre, conflict at College Green and with DCC transport plans. I note the submission by Terenure Templeogue Sustainable Community Association CLG and Professor Austin Smyth, see submission 265 of Appendix 1. Some 20 of the additional submission refer to Rathfarnham Castle Park, Rathfarnham Wood and Grange Road widening. Some 8 additional submissions refer to the location of construction compound TR3. 18 of the additional submission refer to the Rathmines Road Lower Busgate. 17 submissions call for, or object to the fact, an Oral Hearing was not held. 8 raise concern with regard to gradient of driveway accesses, impact upon 51 – 71 Rathfarnham Road and compliance with Part M of the Building Regulations. 12 of the additional submissions raise concern with respect to Turn bans and traffic diversions, 12 raise concern with respect to

impact upon TRE, TRW, loss of trees on TRE and impact upon architectural and historic heritage. 5 refer to Templeogue Busgate. Flawed Bus stop locations / distance between bus stops / removal of bus stops on George's Street, TRE, Rathgar Village and Rathgar Road. Numerous support is given for improved and additional bicycle lanes, improving public transport supporting environmentally sensitive transport solutions and positive climate change. The only new issue to arise relates to the use of the 2016 Census data for the assessment of travel patterns. It is considered that this is out of date.

- 4.3.5. It is important to note that all relevant issues raised are considered in detail under the specific headings within my report hereunder.

4.4. NTA Response to submissions

The NTA submitted a response to the submissions raised which can be summarised hereunder. It is of note that as outlined above a significant number of submissions are similar in nature and are concerned with the same issues, such as some 64 no. initial submissions relating to the impact upon Rathfarnham Road, Rathfarnham Castle Park and site Compound TR3 also some 116 initial submissions relating to Terenure and Rathgar, justification for route selection impact upon heritage properties and relocation of bus stops. In the interest of conciseness rather than list every submission and repeat the same response I will summarise the response based on topic and where there are standalone issues raised I will refer to the particular submission and summarise the response accordingly.

Query the need and justification for the project.

- 4.4.1. The NTA has outlined the need for the proposed scheme stating that: The key radial traffic routes into and out of Dublin City Centre are characterised by poor bus and cycle infrastructure in places. Effective and reliable bus priority depends on a combination of continuous bus lanes and signal control priority at pinch-points and junctions. Currently bus lanes are available for 30% of Templeogue / Rathfarnham to City Centre, with signal control priority for buses provided over 2% of the Proposed Scheme. Cyclists must typically share space on bus lanes or general traffic lanes with only 15% of the route providing segregated cycle tracks.

- 4.4.2. Private car dependence has resulted in significant congestion that has impacted on quality of life, the urban environment and road safety. The population of the Greater Dublin Area (GDA) is projected to rise by 25% by 2040 (National Planning Framework, 2018), reaching almost 1.5 million. This growth in population will increase demand for travel necessitating improved sustainable transport options to facilitate this growth.
- 4.4.3. Without intervention, traffic congestion will lead to longer and less reliable bus journeys throughout the region and will affect the quality of people's lives. The Proposed Scheme is needed in order to enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor through the provision of enhanced walking, cycling and bus infrastructure on this key access corridor in the Dublin region.
- 4.4.4. It is indicated by the applicant that the impact of the reduction in general traffic flows along the route will be a Positive, Moderate and Long-term effect whilst the impact of the redistributed general traffic along the surrounding road network will have a Negative, Slight and Long-term effect. Thus, it is contended overall, there will be no significant deterioration in the general traffic environment in the study area as a consequence of meeting the scheme objectives of providing enhanced sustainable mode priority along the direct study area.
- 4.4.5. The proposal has been justified in terms of bus journey times and climate change impacts.
- 4.4.6. The NTA submit that the Proposed Scheme will reduce total bus journey times along the Proposed Scheme by up to 12% in 2028 and 9% in 2043. Based on the AM and PM peak hours alone, this equates to 7.4 hours of savings in 2028 and 6.2 hours in 2043 combined across all buses when compared to the Do Minimum. On an annual basis this equates to approximately 5,600 hours of bus vehicle savings in 2028 and 7,700 hours in 2043, when considering weekday peak periods only.
- 4.4.7. The proposed scheme will also support the delivery of government strategies outlined in the 2023 CAP and the 2021 Climate Act by enabling sustainable mobility and delivering a sustainable transport system.

Reliability of the traffic modelling, data counts and up to date nature of the information.

- 4.4.8. The NTA notes the comments raised in relation to the traffic modelling and the presentation of the associated data. It is submitted that Chapter 21 of the EIAR assesses the cumulative Impact of the construction of all 12 Core Bus Corridor schemes, including the Templeogue/Rathfarnham CBC Scheme, the Kimmage to City Centre CBC Scheme and the Tallaght/Clondalkin to City Centre CBC Scheme. Cumulative traffic impacts are also set out in the Traffic Impact Assessment Report in Appendix A6.1 of Volume 4 of the EIAR.
- 4.4.9. Due to the scale of the BusConnects Infrastructure programme, it was necessary to utilise two separate traffic count surveyors. Because of this, the presentation of data presented for schemes on the northside of the city, is not exactly the same as the presentation of data for schemes on the southside of the city. Notwithstanding this, the same data was collected and analysed in designing and assessing the proposed scheme as was for the other schemes. The raw traffic data has been shared with the public as background information to the planning application. Section 6.2.5.2.2 of Chapter 6 of the EIAR notes the following in relation to the traffic counts undertaken: “Due to the scale of the CBC Infrastructure Works, the proposed scheme required a full set of consistent updated traffic counts for a neutral period e.g. November / February when schools, colleges were in session. Traffic surveys were undertaken in November 2019 and February 2020 (Pre-Covid) with the surveyed counts used as inputs to the model calibration and validation process of the strategic model and micro-simulation model. The two types of counts used in the study are Junction Turning Counts (JTCs) and Automatic Traffic Counts (ATCs).”
- 4.4.10. Section 6.3.2 of Chapter 6 of the EIAR sets out the extensive modelling exercise carried out in developing and assessing the Proposed Scheme. There are four tiers of transport modelling which have been used to assess the impacts of the Proposed Scheme:
- Tier 1 (Strategic Level): The NTA’s East Regional Model (ERM) is the primary tool which has been used to undertake the strategic modelling of the Proposed Scheme and has provided the strategic multi-modal demand outputs for the proposed forecast years;
 - Tier 2 (Local Level): A Local Area Model (LAM) has been developed to provide a more detailed understanding of traffic movement at a local level. The LAM is a subset model created from the ERM and contains a more

refined road network model used to provide consistent road-based outputs to inform the TIA, EIA and junction design models. This includes information such as road network speed data and traffic redistribution impacts for the Operational Phase. The LAM also provides traffic flow information for the micro-simulation model and junction design models and has been used to support junction design and traffic management plan testing.

- Tier 3 (Corridor Level): A micro-simulation model of the full ‘end to end’ corridor has been developed for the Proposed Scheme. The primary role of the micro-simulation model has been to support the ongoing development of junction designs and traffic signal control strategies and to provide bus journey time information for the determination of benefits of the Proposed Scheme; and
- Tier 4 (Junction Level): Local junction models have been developed, for each junction along the Proposed Scheme to support local junction design development. These models are informed by the outputs from the above modelling tiers, as well as the junction designs which are, as discussed above, based on people movement prioritisation.”

4.4.11. A large number of figures are included in Chapter 6 of the EIAR to demonstrate the transport modelling carried out, and the NTA is satisfied that modelling and presentation of results is in line with best practice industry standards.

4.4.12. The NTA notes that the approach adopted in assessing and presenting the information is in line with TII’s Traffic and Transport Assessment Guidelines (May 2014). This document is considered best practice guidance for the assessment of transport impacts related to changes in traffic flows due to proposed developments and is an appropriate means of assessing the impact of general traffic trip redistribution on the surrounding road network.

4.4.13. It is submitted that the design of the scheme was an iterative process and responded to constraints and requirements that were added to the models overtime. Models were calibrated to account for the difference between modelled and observed traffic flows which improved the accuracy of the outcomes of the proposed route.

Alternatives Options Not Considered.

4.4.14. Some third parties have raised concerns in relation to the overall justification of the Proposed Scheme in terms of alternative proposals which should be prioritised in lieu

of the works (e.g. DART upgrades), and whether the works are justified in light of the new working environment in a post-COVID era.

- 4.4.15. The NTA submit that the appropriate type of public transport provision in any particular case is predominately determined by the likely quantum of passenger demand along the particular public transport route. With this in mind the applicant considered the option of constructing a light rail service which would cater for a passenger demand of between 3,500 and 7,000 per hour per direction (inbound and outbound journeys). Based on the number of passengers predicted to use the new service, it was considered that there would be insufficient demand to justify a light rail option. The light rail option would also require significantly more land take, necessitating the demolition of properties.
- 4.4.16. Metro alternative was also considered and as there is a higher capacity requirement for such solutions, generally designed for peak hour passenger numbers exceeding about 7,000 passengers per hour per direction, it was deemed not suitable for this route. In addition, the development of an underground metro would not remove the need for additional infrastructure to serve the residual bus needs of the area covered by the proposed scheme.
- 4.4.17. Heavy rail alternatives carry in excess of 10,000 people each direction each hour and was considered an unsuitable solution.
- 4.4.18. Demand management in the form of restricting car movement or car access through regulatory signage and access prohibitions, to parking restrictions and fiscal measures (such as tolls, road pricing, congestion charging, fuel/vehicle surcharges and similar) were all considered as alternatives to the proposed scheme. However, it is stated that in the case of Dublin, the existing public transport system does not currently have sufficient capacity to cater for large volumes of additional users, such measures would not work in isolation to address car journeys into and out of the city and would not encourage people onto alternative modes.
- 4.4.19. Whilst technological alternatives are becoming increasingly advanced, the use of electric vehicles does not address congestion problems and the need for mass transit.

Route Alternatives

4.4.20. The NTA submit that alternative route options have been considered in a number of areas during the iterative design of the Proposed Scheme, such as optimising the road layout in constrained locations including Rathfarnham Road, Rathgar Road, Rathmines Road Lower and Templeogue Road. The iterative development of the Proposed Scheme has also been informed by a review of feedback and new information received during each stage of public consultation and as data, such as topographical surveys, transport and environmental information was collected and assessed. In addition, the potential for climate impact was considered in all phases of the design process for the Proposed Scheme. As the design progressed climate was indirectly affected in a positive way by refining the design at each stage through reducing the physical footprint of the scheme coupled with the inclusion of technological bus priority measures.

4.4.21. The Feasibility and Options Reports identified feasible options along the corridor, assessed these options and arrived at an Emerging Preferred Route. Two reports were published for the Proposed Scheme; the Rathfarnham to City Centre Core Bus Corridor CBC Feasibility Study and Options Assessment Report and the Tallaght to Terenure Core Bus Corridor CBC Feasibility Study and Options Assessment Report. These Reports formed the basis for the first phase of public consultation. The Feasibility and Options Reports used a two-stage assessment process to determine the Emerging Preferred Route, comprising:

- Stage 1 – an initial high-level route options assessment, or ‘sifting’ process, which appraised routes in terms of ability to achieve scheme objectives and whether they could be practically delivered. The assessment included consideration of the potential high level environmental constraints as well as other indicators such as land take (particularly the impact on residential front gardens); and
- Stage 2 - Routes which passed the Stage 1 assessment were taken forward to a more detailed qualitative and quantitative assessment. All route options that progressed to this stage were compared against one another using a detailed Multi-Criteria Analysis (MCA) in accordance with the Department of Transport Document ‘Common Appraisal Framework for Transport Projects and Programmes’.

- 4.4.22. The study area for the Tallaght to Terenure corridor comprised of two main sections;
- Section 1 examined feasible route options from the N81/M50 interchange to the Springfield Avenue/Templeville Road corridor.
 - Section 2 examined feasible route options from the Springfield Avenue/Templeville Road corridor to Terenure Road West.
- 4.4.23. The study area for the Rathfarnham to City Centre corridor comprised of three main sections:
- Section 1 examined feasible route options from Taylors Lane and Grange Road to the River Dodder.
 - Section 2 examined feasible route options from the River Dodder to the Grand Canal.
 - Section 3 examined feasible route options from the Grand Canal to Dame Street.
- 4.4.24. 16 individual links were considered for the Tallaght to Terenure corridor and 104 no. for the Rathfarnham to City Centre section.
- 4.4.25. Following completion of the Stage 1 initial appraisal, three options were brought forward to the Stage 2 assessment between Nutgrove Avenue and Dodder View Road (Section 1 of the Rathfarnham to City Centre Corridor), SA1 to SA3. For the section between Dodder View Road and Grand Canal (Section 2 of the Rathfarnham to City Centre Corridor), Seven options were brought forward to the stage 2 assessment, CB1 to CB7. The reasonable alternatives options were progressed to Stage 2 of the assessment process. These routes were then considered against the following criterion: economy, integration, accessibility and social inclusion, safety and environment. Under each headline criterion, a set of sub-criteria were used to comparatively evaluate the options which included capital costs, transport quality and reliability, land use policy, archaeological, architectural and cultural heritage, flora and fauna, soils and geology, hydrology, and landscape and visual, air quality, noise and vibration and land use character.
- 4.4.26. The proposed scheme initially comprised of two Core Bus Corridors, the Tallaght to Terenure Core Bus Corridor and The Rathfarnham to City Centre Core Bus Corridor. Following the completion of the public consultation process in relation to the

Emerging Preferred Route (EPR), various amendments were made to the scheme proposals to address a number of the issues raised in submissions, including incorporating suggestions and recommendations from local residents, community groups and stakeholders, and/or arising from the availability of additional information. These amendments were incorporated into the designs and informed a draft Preferred Route Option (PRO). Additional design development took account of:

- New and updated topographical survey information.
- Output from engagement and consultation activities on the (EPR) and draft (PRO) proposals;
- Further design development and options assessment; and
- Changes in the extent of the scheme.

4.4.27. Where substantial revisions had been made to the design since the publication of the EPR, options were assessed using Multi Criteria Assessment (MCA) to determine the PRO. The MCA assessed any newly developed options against the previously identified EPR. The methodology and MCA used were consistent with that carried out during the initial route optioneering work (including consideration of the relevant environmental aspects), which informed the identification of EPR.

4.4.28. There were eight scheme sub-options (TVR1 to TVR8) considered for the section along Rathfarnham Road and Terenure Road East to Rathgar Village. Section 3.3.2.2.2.1 of EIAR Chapter 3 describes the subsection between Terenure Village and Rathgar Village. Following an MCA, sub-option TVR3 was identified as the preferred option for this sub-section and was brought forward for assessment as part of the principal route options.

4.4.29. Section 3.3.2.2.2.2 of EIAR Chapter 3 describes the Parallel Cycle Route Options between the Dodder Crossing and the Grand Canal. There were six scheme sub-options (CR1 to CR6) considered for the section between the Bushy Park junction on Rathfarnham Road to the Grand Canal Crossing via Rathmines Village. The assessment sub-criteria which were differentiators between scheme sub-options included Capital Cost, Road Safety, Coherence, Directness, Attractiveness, Comfort, and Environment. Sub-option CR5 was identified as having significant benefits over other sub-options in relation to attractiveness and comfort, and some benefits over other sub-options in relation to road safety, coherence and directness. Following an

MCA, sub-option CR5 was identified as the preferred option for this sub-section and was brought forward for assessment as part of the principal route options.

- 4.4.30. It is stated that informed by the appraisal of options, the EPR was identified. A non-statutory public consultation on this EPR was undertaken from 23 January 2019 to 30 April 2019, providing feedback which was then considered in the further development of the scheme proposal.
- 4.4.31. The EPR Option proposal included a proposed connection for cyclists to Brookvale Downs via a narrow laneway between an existing residential property and a petrol station. While it was proposed as part of the EPR Option to widen a section of this laneway, it is noted from a review of the topographical survey that this would require demolition of one or other of these buildings to accommodate a two-way cycle route as well as accommodating pedestrians. Concerns relating to the proposal from the public were coupled with the delivery of a compromised and potentially unattractive route for cyclists. As such, alternative cycle route options were explored in this area in determining the draft PRO.
- 4.4.32. Furthermore, based on a review of the topographical survey, it became more evident that a number of properties along Rathfarnham Road, between Brookvale Road and Dodder Park Road, as well as north of the Dodder, between Dodder Park Road and Rathdown Park, currently have steep driveways in excess of current standards. As part of the public consultation, the issue of compliance with Part M of the Building Regulations was highlighted. It was considered, that with the level of land acquisition proposed as part of the EPR Option, existing driveways would be made much steeper than they currently are and would not be compliant with the Regulations without substantial mitigation. As such, alternative design solutions were therefore explored in this area in determining the draft PRO.
- 4.4.33. Within this section of the CBC route, Rathfarnham Road is particularly constrained in terms of the available width. As such, this section of the route was brought through an initial assessment to determine the optimum alternative cycle route for this section.
- 4.4.34. In developing options for alternative cycle routes, it became evident that some options being considered would require a new pedestrian and cyclist bridge crossing the River Dodder. Two potential bridge sites were identified within this general location. In order to rationalise the number of parallel cycle route options to be

assessed, an initial assessment of two potential bridge locations within this area was undertaken. The preferred bridge option was then incorporated into end-to-end parallel cycle route options for comparative assessment.

- 4.4.35. Following the initial assessment of Parallel Cycle Route options, a number of principal route options for the delivery of the CBC scheme from Grange Road to Rathdown Park were developed.
- 4.4.36. Option RF2 – the provision of two bus lanes and two general traffic lanes on Rathfarnham Road south of the Dodder with cyclists diverted to the draft preferred parallel route - was identified as the preferred option as it best aligned with the objectives for the Proposed Scheme by providing full physical bus priority throughout the section and minimising the impact on residential properties with steep existing driveways on Rathfarnham Road through the provision of an alternative cycle route linking to Rathdown Park. This option would provide bus priority, and while cycle facilities would not be provided along a short section of the CBC, the proposal included an attractive and safe alternative.
- 4.4.37. The Preferred Route Option Report provided as part of the Supplementary Information sets out the rationale for combining the Tallaght to Terenure Core Bus Corridor and the Rathfarnham to City Centre Core Bus Corridor. During the non-statutory public consultations and the route selection process up to the choice of the Preferred Route Option (PRO) these two sections had been considered separately. The principal reasons for combining the Templeogue to Terenure and the Rathfarnham to City Centre sections into the Proposed Scheme include: their geographical association, functional interdependence and the fact that the Templeogue to Terenure section joins the Rathfarnham to City Centre section at Terenure Place and shares the remaining section of the route from that junction to the City Centre.

Concern of traffic safety, redistribution of traffic to surrounding roads, congestion for local residents, longer journey times, loss of on-street car parking.

- 4.4.38. The NTA submit that the proposed scheme is needed in order to enable and deliver efficient, safe and integrated sustainable transport movement along the corridor through the provision of enhanced walking, cycling and bus infrastructure on this key access corridor in the Dublin region.

- 4.4.39. The proposed scheme is delivering on a remit of smarter travel with proposed improvements to walking and cycling infrastructure. It is the NTA's submission that the loss in carriageway width for private cars is outweighed by improved sustainable travel opportunities and a knock-on increase in scope to accommodate higher density development in the vicinity of the Proposed Scheme. The decrease in space allocated to private cars could be viewed as advantageous in promoting modal shift.
- 4.4.40. Private car dependence has resulted in significant congestion that has impacted on quality of life, the urban environment and road safety. The population of the Greater Dublin Area (GDA) is projected to rise by 25% by 2040 (National Planning Framework, 2018), reaching almost 1.5 million. This growth in population will increase demand for travel necessitating improved sustainable transport options to facilitate this growth. Without intervention, traffic congestion will lead to longer and less reliable bus journeys throughout the region and will affect the quality of people's lives. The Proposed Scheme is needed in order to enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor through the provision of enhanced walking, cycling and bus infrastructure on this key access corridor in the Dublin region.
- 4.4.41. It is indicated by the applicant that the impact of the reduction in general traffic flows along the Proposed Scheme will be a Positive, Moderate and Long-term effect whilst the impact of the redistributed general traffic along the surrounding road network will have a Negative, Slight and Long-term effect. Thus, it is contended overall, there will be no significant deterioration in the general traffic environment in the study area as a consequence of meeting the scheme objectives of providing enhanced sustainable mode priority along the direct study area.
- 4.4.42. The Proposed Scheme will deliver strong positive impacts in terms of promoting active travel and sustainable transport. I note that the modelled forecasts for the 2028 opening year indicate that one of the impacts of the proposed Templeogue / Rathfarnham to City Centre Core Bus Corridor Scheme is that there is a reduction of 30% in the number of people travelling via car along the Proposed Scheme towards the city centre at AM peak hour. Similarly, in the PM peak hour, there is a reduction of 39% in the number of people travelling outbound via car.
- 4.4.43. The Proposed Scheme will deliver critical and necessary physical infrastructure which is required to sustain and cater for the projected population growth. It will also

provide more accessible, resilient, efficient and reliable public transport to the most disadvantaged and vulnerable in society, in a safer environment while also allowing travellers to benefit from better journey times and providing comfortable, predictable and attractive alternative to the private car. I also note that the private car will continue to be accommodated within the corridor albeit reallocation of road space will be in favour of public transport, cycling and pedestrian facilities.

- 4.4.44. To determine the impact that the Proposed Scheme (in combination with the other proposed Core Bus Corridor schemes) will have in terms of general traffic redistribution, the LAM Opening Year (2028) and Design Year (2043) model results have been used to identify the difference in general traffic flows between the Do Minimum and Do Something scenarios i.e. with and without all proposed Core Bus Corridor schemes in place. The changes in traffic flows have been presented with reference to TII's Traffic and Transport Assessment Guidelines (May 2014) i.e., traffic redistribution resulting in an increase or decrease above 100 combined flows (i.e. in a two-way direction) along roads in the vicinity of the Core Bus Corridors in the AM and PM Peak Hours are presented. The threshold aligns with an approximate 1 vehicle per minute increase or decrease per direction on any given road. This is a very low level of traffic change on any road type and ensures that a robust assessment of the changes in traffic levels are presented.
- 4.4.45. The applicant submits that the cumulative impact for the movement of People by sustainable modes with the Proposed Schemes in place has been appraised as a qualitative assessment, taking into account the changes in mode share, demand changes by mode along the Proposed Scheme (and the other Core Bus Corridors) as well as bus usage and integration with other public transport modes, as presented above. It is acknowledged that a certain level of residual traffic redistribution is likely, however, these increases are largely constrained to new road infrastructure (as part of the Proposed Schemes) and regional and distributor roads that are designed to cater for high volumes of traffic. The Proposed Schemes in combination have been adjudged to deliver a high positive overall impact on People Movement by sustainable modes. The Proposed Schemes can be shown to deliver significant improvements in People Movement by sustainable modes along the direct Proposed Scheme alignments, particularly by bus and cycling, with reductions in car mode share due to the enhanced sustainable mode provision. The Proposed Schemes provide for enhanced integration and efficiencies for all public transport modes by

facilitating substantial increases in public transport average network wide travel speeds.

4.4.46. The applicant submits that evidence shows:

- No material increase or decrease in traffic is anticipated along Highfield Road, Palmerston Road or Palmerston Park as a result of the Proposed Scheme.
- Negligible impact on junctions along Palmerston Road and Palmerston Park as a result of the Proposed Scheme.
- An overall reduction in traffic along Rathmines Road Upper (-191 PCUs) in the morning peak period. It is noted that this is along the northern section Rathmines Road Upper.
- The majority of Rathmines Road Upper would see no material increase in traffic (+/- 100 PCU).
- An increase in traffic is projected on the southern part of Rathmines Road Upper (+113 PCUs).
- An increase in traffic is projected along Palmerston Park (+238 PCU), although it is noted that this is just the portion in the middle of the Rathmines Road Upper/Palmerston Park/Dartry Road junction.
- Junction capacity assessment was undertaken along road links to determine they have the capacity to cater for the additional traffic volumes as a result of the Proposed Scheme.
- While there is some redistribution of traffic as a result of the Proposed Scheme, the traffic impact is however considered to be negligible.
- It is not expected that there will be any increase in traffic along Highfield Road and as a result access to Saint Luke's hospital will not be affected.
- It is acknowledged by the applicant that some sections of footpath along Rathgar Road have been reduced from published guidance at a number of constrained locations along the Proposed Scheme.
- The route options were assessed using a Multi-criteria analysis, which included an assessment of safety criteria.

4.4.47. In meeting its objectives, the Proposed Scheme will deliver strong positive impacts in terms of promoting active travel and sustainable transport. It is noted that the modelled forecasts for the 2028 opening year indicate:

- A significant decrease in people travelling to/from the city by car in each peak period with decreases of 30% and 39% in the AM and PM peak periods respectively.
- A significant increase in people travelling by public transport in each peak period with increases of 123% and 145% in the AM and PM peak periods respectively.
- A significant increase in people walking/cycling in each peak period with increases of 79% and 91% in the AM and PM peak periods respectively.

4.4.48. The assessment presented in the Chapter 6 of the EIAR indicates that while there is some redistribution of traffic as a result of the Proposed Scheme, the traffic impact is considered to be negligible.

4.4.49. As noted in section 6.4.6.1.1.4 of Chapter 6 of Volume 2 of the EIAR, the potential impacts of the Proposed Scheme on parking and loading provision have been assessed through a comparison of the availability of spaces or lengths of bay in the Do Minimum and Do Something scenarios. The assessment considers the impact of any changes on the general availability of parking and loading in the vicinity of the Proposed Scheme. This qualitative assessment has also taken into account nearby parking, which is defined as alternative parking locations along side roads within 200 – 250m of the Proposed Scheme.

Concern of noise and pollution, anti-climate change.

4.4.50. The NTA's response sets out the impact of noise and vibration have been assessed and are reported in Chapter 9 Noise and Vibration of Volume 2 of the EIAR. The traffic noise impacts associated with the Proposed Scheme have fully considered any physical changes along the Proposed Scheme.

4.4.51. Section 9.4.4.1 of EIAR Volume 2 Chapter 9 Noise and Vibration provides details of the assessment undertaken for the Operational Phase of the Proposed Scheme in respect of the potential noise and vibration impacts associated with altered traffic flows, realigned traffic lanes and displaced traffic flows.

4.4.52. It is submitted that along the majority of roads of the Proposed Scheme within the 1km study area, impacts as a result of traffic redistribution are determined to indirect, positive, imperceptible to slight, and short to medium term to negative, slight to moderate, and short to medium term once the Proposed Scheme becomes

operational.” It goes on to state that “There are a small number of roads in the overall study area where there are potential initial significant impacts. These are defined as roads with a traffic noise level above a daytime noise level of 55 dB LAeq,16hr an increase in noise level greater than 3 dB.”

4.4.53. EIAR Volume 2 Chapter 7 Air Quality provides details of the air quality assessment undertaken for the Proposed Scheme. Emissions from brake and tyre wear in the form of particulate matter (PM)(as PM10 and PM2.5) have been included in the air dispersion modelling assessment through the use of the emissions factor toolkit (EFT,v10.1), which takes into account vehicle exhaust, brake wear, tyre wear and road abrasion for both PM10 and PM2.5. Details of the use of EFT and modelling methodology can be found in Section 7.2.4.1.2. The assessment of air quality impacts due to PM therefore includes both exhaust and non-exhaust emissions. Regarding quantification of emissions associated with electric vehicles, a proportion of electric vehicles in the fleet has been included in the assessment of both 2028 and 2043 emissions.

4.4.54. Overall, it is submitted by the NTA that the residual effects as a result of the Proposed Scheme’s operation are neutral and long-term.

No consideration of what happens buses in the City Centre

4.4.55. The Proposed Scheme forms part of the wider Core Bus network which aligns with the Greater Dublin Area Transport Strategy to form an integral part of the improved public transport infrastructure measures for the Dublin Metropolitan area.

4.4.56. The Core Bus Network Report focused on the overall existing bus service network and identified locations where the bus network is operating sub-optimally. The network is dominated by a radial network to / from Dublin City Centre, supplemented by low frequency orbital and local bus routes serving larger destinations outside of the City Centre core.

4.4.57. The GDA Transport Strategy 2016 – 2035 concluded that this high-quality Core Bus Network would form an integral part of the improved public transport infrastructure measures for the Dublin Metropolitan Area. The final resulting Core Bus Network presented in the GDA Transport Strategy represents the most important bus routes within the Dublin Metropolitan Area, generally characterised by high passenger volumes, frequent services and significant trip attractors along the routes.

4.4.58. In meeting its objectives, the Proposed Scheme will deliver strong positive impacts in terms of promoting active travel and sustainable transport. This is demonstrated in the traffic modelling undertaken, the results of which are presented in Chapter 6 of the EIAR. It is noted that this modelling includes the movement of buses to and through the city and centre, and as such the benefits include consideration of buses moving through the city centre.

Concern of loss of trees and built heritage.

- 4.4.59. The NTA submit that there will be 935 trees retained as part of the Proposed Scheme with a total of 169 trees identified for removal. The Preliminary Design Report in the Supplementary Information notes that there will be 400 new trees planted, resulting in an overall net increase of 231 (24%) in individual trees as a result of the Proposed Scheme.
- 4.4.60. There are a number of areas along the extent 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.
- 4.4.61. Conservation areas and heritage areas are located along significant sections of the Proposed Scheme. It is submitted that the Proposed Scheme traverses through four CAs within the Dublin City Council administrative area. These areas contain structures of Local to National importance and of Low to High Sensitivity. There are no equivalent Conservation Areas in the South Dublin Area.
- 4.4.62. The construction of the Proposed Scheme will directly impact on properties located within residential conservation areas with impact on garden boundaries, entrances, gardens, loss of trees and other plantings. The buildings themselves will not be impacted. The applicant submits that the scheme has been subject to an iterative design development process which has sought insofar as practicable to avoid or reduce negative impacts, including townscape and visual impacts. Nevertheless, the scheme will give rise to some degree of townscape and visual effect, most notably during the construction phase. These impacts arise especially where there is temporary and / or permanent acquisition of lands associated with residential or other

properties including amenities, and where tree removal is required. The project includes for replacement of disturbed boundaries, reinstatement of the construction compounds, return of temporary acquisition areas, and for additional tree and other planting where possible. In the Operational Phase localised residual effects will remain for properties, including protected structures, experiencing permanent land acquisition.

- 4.4.63. There will be continued effects during operation from impacts on properties located within residential conservation areas – particularly from loss of trees and other plantings which were removed during the Construction Phase. However, there will be like-for-like reinstatement of boundaries, planting and, in most cases, the planting of new street trees in similar locations to those removed, which will negate negative effects over the long-term.
- 4.4.64. The Preliminary Design Report notes: “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.”
- 4.4.65. The NTA submit that, there will be overall positive effects for all sections of the scheme, excluding Nutgrove to Terenure Road North, which will have a neutral effect (Rathfarnham Castle, Rathfarnham Road, Rathfarnham Village). The project provides for improvements in the urban realm, which will provide positive long-term effects for the townscape and visual character, most notably at centres of Rathgar and Rathmines and along the route from Grand Canal to Dame Street. The restoration and reincorporation of Templeogue Arch into the streetscape will also be a notable improvement.

Concern of impact upon biodiversity and wildlife systems.

- 4.4.66. It is submitted by the applicant that a number of habitat types considered to be of Local Importance (Higher Value) will be lost as a result of the Proposed Scheme. These include relatively small areas of (mixed) broadleaved woodland (WD1), scattered trees and parkland (WD5), hedgerow (WL1), and treeline (WL2) habitats.
- 4.4.67. To mitigate loss of habitat, the following proposed planting shall be incorporated into the Scheme:

- 400 trees planted;
- 126.4m of proposed hedgerow;
- 7,300 m2 of proposed species rich grassland;
- 932 m2 of proposed ornamental planting; and,
- 9,212 m2 of proposed amenity grassland planting.

4.4.68. The mitigation strategy set out in the EIAR includes mitigation for both construction and operation as necessary in respect of protected species confirmed present or on a precautionary basis likely to occur based on desktop data search and professional judgement, Birds, Bats and other mammals as well as habitat replacement and through the landscaping design.

4.4.69. The mitigation measures, which will be implemented will mitigate impacts on breeding birds, bats etc. to levels that are not significant at any geographic scale and that the flexibility provided in the mitigation measures in terms of timing of removal of vegetation are appropriate given the nature of most of the vegetation within the proposed scheme boundary, which comprises a narrow, albeit substantial band of wooded vegetation of early mature and mature tree with some and mixed scrub understorey as well as a limited area of open grassland alongside the existing RCP boundary wall. There are no significant residual effects on protected species predicted following adoption of the mitigation measures prescribed.

4.4.70. The protection of water quality is an integral element of the mitigation strategy across all Key Ecological Receptors (KERs) and across the entirety of the Proposed Scheme and further afield for both construction and operation e.g., Protection of European sites and, habitats, protected species, fisheries and distal marine mammals, as well as the mitigation measures provided for Water.

4.4.71. In terms of significance with respect to Bats, the tree losses which are along the edge of an artificially lit roadway are not considered significant in terms of potential commuting//foraging territory except at a local scale. The loss of the linear strip of woodland habitat along a boundary of the Rathfarnham Castle Park (RCP) is locally significant in terms of impacts to wildlife. However, it must be recognised that the loss represents a narrow edge effect adjacent to the busy road, and that the bulk of the woodland and understorey vegetation inside the RCP is being retained. Mitigation has been prescribed for breeding birds preconstruction surveys for mammals – badger, bats, roost confirmation and or usage, vegetation clearance

during the bird nesting season and good site practices in demarcating the works area, as are prescribed in the CEMP Appendix A5.1.

- 4.4.72. In respect of otter, surveys were undertaken at all watercourses intersected by the Proposed Scheme, particularly given the well documented importance of the River Dodder and the Owendoher River. This included as where necessary additional instream surveys by surveyors undertaking the aquatic surveys. As earlier design iterations of the Proposed Scheme included direct impacts on the Owendoher River, with known otter activity, licenced trail camera monitoring of the holt was undertaken. A recent site visit on October 4th 2023 found no evidence of otter activity at this holt, which is outside the Proposed Scheme Boundary. Holts can be seasonally / temporarily abandoned (NRA 20063 , NPWS 20094) and as such could be utilised at the time of construction. This eventuality is fully accounted for in the assessment and mitigation strategy presented in the Biodiversity Chapter and AA.
- 4.4.73. Further investigation of the above ground mill race and its connectivity from the Whitechurch Stream and later discharge into the Owendoher River, was undertaken in October 2023 upstream of the previously identified holt location. There was no evidence of otter activity nor usage within the aboveground section of the mill race within RCP nor evidence of suitable habitation features in accessible areas around the pond nor aquatic prey other than small fish – three spined stickleback. It is considered that there is little suitable habitat for otter to inhabit, and to access the RCP would involve a significant passage through a narrow culvert that spans a considerable distance from the potential nearest aboveground watercourse. The NRA Guidance notes that extensive culverts such as the mill race that enters RCP are avoided by otter (NRA 2006).
- 4.4.74. The mill race egress culvert extends more than 145m underground from the egress point in RCP before discharging to the Owendoher River. The likely discharge pipe is situated approximately 1- 1.5m above the opt of the watercourse and is a narrow pipe whose dimensions are not suitable for otter passage. Given this, it is considered that otter have no practical way of arriving in RCP nor adequate accessible territory with which to roam.
- 4.4.75. Rathfarnham Castle Park has not previously been identified as an ex-situ site for Special Conservation Interest wintering birds, but does nonetheless support wintering birds such as ducks, moorhens and some SCI gulls. While the Proposed

Scheme will remove a narrow section along the boundary of the RCP, the majority is comprised of wooded vegetation which is not ordinarily utilised by wintering birds, as it prevents easy take off in case of disturbance/predation. Ideally wintering birds like large open spaces such as the central parts of RCP, which are not being directly impacted by the Proposed Scheme.

- 4.4.76. The Proposed Scheme will have no direct impact on the pond within Rathfarnham Castle Park. The typical birds noted from within RCP are considered habituated to disturbance given the volume of users of the urbanised park and a relative lack of similar territories across the wider area, e.g. Bushy Park ponds, River Dodder. The majority of the birds are largely associated with the pond, although they utilise adjacent areas including the open grassland in the centre of RCP. These open areas afford some protection, where direct predation is less likely or disturbance posed by existing parks users and/or predators is less likely.
- 4.4.77. The mitigation strategy proposed for all works areas in respect of birds includes the timely removal in as far as practical of vegetation and the isolation of working areas so that disturbance – construction lighting noise etc is reduced. Thus mitigation is specified in the EIAR for all birds in terms of vegetation removal, noise reduction etc.

Concern of impact upon mobility impaired and elderly

- 4.4.78. It is submitted that an important consideration during the development of the PDGB was implementation of measures to mitigate pedestrian-cyclist conflict. The 'dutch-style' junction described in the application is typical of many junctions in the Netherlands and it allows for a potential un-signalised conflict between pedestrians and cyclists, which depends on a level of courtesy to ensure that collisions are avoided. Following discussions with Irish disability groups, the issue of this potential conflict was raised as a significant concern along the core bus corridors for the visually impaired and for the mobility impaired, based on their members' experiences. Pedestrians are the most vulnerable of road users, and the addition of disability exacerbates this vulnerability. The four junction types within the PDGB have specifically been set out to mitigate these potential conflicts insofar as is reasonably practicable.
- 4.4.79. The 'dutch style' junctions have not been adopted for junctions on the Proposed Scheme.

- 4.4.80. Island Bus Stops are the preferred bus stop option to be used as standard on the BusConnects Infrastructure Works where space constraints allow. Island bus stops 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 horizontal cycle track deflection is proposed on the approach to the island to reduce cyclists' speed 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.
- 4.4.81. Where space constraints do not allow for an island bus stop, it is proposed that shared Bus stop landing zone provides an option consisting of a shared bus stop landing zone that may be considered. This proposed arrangement will remove the conflict between cyclists and stopping buses by ramping cyclists up to the footpath level where they continue through the stop.
- 4.4.82. It is submitted that to address the pedestrian/cyclist conflict, which would apply to wheelchair users also, the cycle track should be narrowed on approach to the bus stop and yellow bar markings should be provided to alert cyclists to the potential conflict ahead. In addition to this, at the bus stop, the cycle track should be deflected to provide a 1.0m wide boarding/alighting zone for bus passengers, including wheelchair users. Also, appropriate tactile kerbing should be provided to ensure that visually impaired users are aware of crossing areas.

Concern of impact upon urban villages of Terenure, Rathmines and Rathgar.

- 4.4.83. The applicant submits that the Proposed Scheme makes improvement to Key Urban Villages and Neighbourhood Centres, to support the sustainable consolidation of the city, to align with the principles of the 15 minute city, to provide for the essential economic and community support for local neighbourhoods and to promote and enhance the distinctive character and sense of place of these areas.
- 4.4.84. The junction at Butterfield Avenue will be rationalised to introduce better pedestrian and cycle facilities with widened footpaths facilitating provision of additional landscaping and tree planting. Rathfarnham Road, either side of the Dodder River, will require encroachment into private front gardens. There will be loss of existing

trees and vegetation, both on street and within front garden boundaries, however, the proposals include for reinstatement of garden boundaries and landscaping and the provision of new street trees along the public footpath. Leading into Terenure Village, the roadway will be rationalised to provide continuous pedestrian and cycle facilities with refurbishment and re-building footpaths so as to upgrade the appearance and integrity of the public realm. New tree planting will be incorporated to replace existing trees felled and the overall quality of the public realm will be upgraded as it leads into the village core beyond.

- 4.4.85. Terenure Road East will incorporate wider footpaths within the village core and reduced carriageways so as to enhance pedestrian facilities. Widened footpaths will be built using quality material commensurate with that of the built context of the village so as to enhance the character of the village locality. Immediately east of the village, bus lanes are proposed on Terenure Road East, and this will require encroachment into private properties, including associated tree felling and realignment of boundary walls and gates. New tree planting will be provided post construction to mitigate the loss of existing trees. Further east, the majority of interventions are related to re-allocation of existing carriageway in order to provide dedicated bus lanes and physical changes comprising rebuilding of kerbs and upgrade of footpaths to match those existing.
- 4.4.86. At Rathgar Village, the carriageway at the adjoining junction is to be rationalised to reduced vehicular space and to provide additional pedestrian and public realm space. The slip lane from Highfield Road will be removed and this will facilitate the provision of a greatly increased public realm amenity space, with hard and soft landscaping along the shop frontages, that will incorporate seating, tree planting and low-level planting to encourage passive amenity. Medians will be introduced and will incorporate low level planting to further reduce the apparent width of the carriageways. Pavement and kerbs will be re-built using high quality materials sympathetic to the form of the surrounding traditional buildings and the character of the village setting. Importantly, the emerging design avoids impacting the boundary of Christ Church and the mature trees within the grounds and the distinctive focal point of the village will be retained as existing.
- 4.4.87. Along Rathmines Road, the carriageway will be re-allocated to eliminate general through traffic and thereby reduce the overall vehicular demand and provide opportunities for improving pedestrian and cycle facilities along the road. The wider

pavements and cycle tracks will combine visually to substantially widen the pedestrian zone along both side of the street and to reduce the perception of carriageway to the minimum. New footpaths and cycle lanes will be built using high quality materials to enhance the character and presentation of the streetscape and to provide greater pedestrian facilities and amenity that will in turn underpin the vitality of the retail and services business along the street. There will be some new street tree planting together with localised soft landscaping interventions to soften and add diversity and amenity to the streetscape.

4.4.88. 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.

4.4.89. The planting strategy includes replacement of street trees and groups of trees that may be impacted by the Proposed Scheme, but also the introduction of new tree planting and street trees within other spaces and along streets. Reinforcement of green infrastructure along the route will improve the overall amenity, character and appeal of the route corridor and localities along it, as well as enhancing biodiversity. In addition to trees and street trees, other vegetation is also proposed along the route including hedgerows, ornamental planting and amenity grassland, shrub and dry meadow grassy verges. These will be utilised to reinstate property boundaries altered by the Proposed Scheme.

Bus Stops and Bus Shelter Design

4.4.90. The NTA submit that for the Core Bus Corridor Infrastructure Works it is proposed that bus stops should be preferably spaced approximately 400m apart on typical

suburban sections of route, dropping to approximately 250m in urban centres. It is important that bus stops are not located too far from pedestrian crossings as pedestrians will tend to take the quickest route, which may be hazardous. Locations with no or indirect pedestrian crossings should be avoided.

4.4.91. As part of the design of the Proposed Scheme a detailed review of bus stop locations was undertaken as set out in Bus Stop Review Analysis in Appendix H of the Preliminary Design Report provided as Supplementary Information. This exercise was carried out to review existing bus stops along the route of the Proposed Scheme and, where appropriate to rationalise these stops in line with best practice criteria. The criteria that are considered when locating a bus stop are as follows:

- Driver and waiting passengers are clearly visible to each other.
- Location close to key facilities.
- Location close to main junctions without affecting road safety or junction operation.
- Location to minimise walking distance between bus interchange stops.
- Where ideally there is space for a bus shelter.
- Location in pairs, 'Tail to Tail' opposite sides of the road.
- Close to (and on exit side of) pedestrian crossings
- Away from sites likely to be obstructed; and
- Adequate footpath width.

4.4.92. 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.

4.4.93. 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. The cantilever shelter using full width roof and half end panel arrangement provides a second alternative solution for bus shelters in constrained footpath locations. Two alternative narrow roof shelter configurations are also

available which offer reduced protection against the elements compared to the full width roof arrangements. These shelter configurations are not preferred but do provide an alternative solution for particularly constrained locations where cycle track narrowing to min 1m width has already been considered and 2.4m widths cannot be achieved to facilitate the full width roof with half end panel shelter. The desirable minimum footpath widths for the narrow roof configuration are 2.75m (with end panel) and 2.1m (no end panel). The absolute minimum footpath widths for these shelters are 2.4m (with end panel) and 1.8m (no end panel) to allow for boarding and alighting passengers in consideration of wheelchair, pram, luggage and other such similar spatial requirements.

- 4.4.94. The provision of bus shelters in proximity to buildings of architectural significance i.e Protected Structures, (on TRE, Rathgar Road, Rathfarnham Road, Grosvenor Place and Camden Street) has been assessed and considered acceptable and desirable by the NTA. The Traffic Signs and Road Markings Drawings set out in the EIAR present the signage to be included as part of the proposed scheme. The signage strategy, in combination with the supplementary traffic management measures ensure that traffic, including commercial vehicles, are limited to roads suitable for dealing with the traffic.

Concern of impact upon businesses, community, schools, hospitals, services and amenities.

- 4.4.95. The NTA acknowledge the necessity to protect, improve and expand on the pedestrian network, linking key public buildings, shopping streets, public transport points and tourist and recreational attractions whilst ensuring accessibility for all, which directly aligns with the Proposed Scheme objectives.
- 4.4.96. The applicant submits that it is not expected that the Proposed Scheme will not have any adverse effects on the accessibility of commercial vehicles to local villages and businesses with access by vehicle retained to all destinations but by alternative routes compared to the current situation. In relation to the concern raised regarding rerouting of Heavy Good Vehicles through suitable roads. The Traffic Signs and Road Markings Drawings which are provided as an appendix to Chapter 4 Proposed Scheme Description in Part 1 of 3 of Volume 3 of the EIAR present the signage to be included as part of the proposed scheme. The signage strategy, in combination with

the supplementary traffic management measures ensure that traffic, including commercial vehicles, are limited to roads suitable for dealing with the traffic.

Technical Nature of the Application, Validity & Site Notices

4.4.97. The NTA notes the comment regarding the technical nature and volume of the documents presenting a potential barrier to the general public seeking access to information relating to the scheme. Given the nature of such infrastructure schemes as BusConnects Core Bus Corridors, there is invariably a substantial amount of technical information which needs to be provided, so as to ensure that the consent application is comprehensive in nature to meet legislative requirements and provide the competent authority with the necessary information to allow them to reach a decision. The NTA has sought to make the information as concise as possible, while ensuring that the necessary information has been provided. It is considered that the structure of the EIAR does provide the necessary legibility for those interested parties (both lay persons and technical specialists) to find the information of relevance to them. While the EIAR has been prepared in compliance with the EIA Directive, it has also been written to make it accessible to a wider, non-specialist audience in so far as possible.

Validity

4.4.98. With respect to issue raised around the legal principle, the applicants submits that they are empowered by section 44 of the Dublin Transport Authority Act 2008 (as amended) to compulsorily acquire land for the purpose of establishing public transport infrastructure. Thus, the NTA possesses the requisite statutory authority to execute the Compulsory Purchase Order (CPO). Regarding principal, the NTA has delineated the necessity of the Proposed Scheme in the EIAR. This transport requirements of the Proposed Scheme at both regional and local levels is set out. The response submitted to the third party objections expounds on how the Proposed Scheme aligns with various national and regional policies, including but not limited to the National Development Plan (2021-2030), the Transport Strategy for the Greater Dublin Area (2016-2035), the Climate Action Plan (2023), and the Climate Action and Low Carbon Development (Amendment) Act 2021, often referred to as the 2021 Climate Act.

Site Notices.

4.4.99. The NTA complied with all statutory notice requirements in respect of the application for approval of the Proposed Scheme and the application for confirmation of the CPO. In addition, non-statutory site notices were erected in 39 locations along the route of the Proposed Scheme in certain locations where lands are proposed to be compulsorily acquired or where it is proposed to acquire, restrict or otherwise interfere with existing public and private rights of way thereby supplementing the statutory notices for the CPO which were (i) published in a national and a local newspaper and (ii) sent to owners, lessees and occupiers of the lands included in the CPO.

4.4.100. The NTA notes the comment in relation to the incorrect date which was noted on the original site notices. Upon realising this error, the NTA liaised directly with An Bord Pleanála and the public consultation period was extended beyond the original deadline of 20 June 2023 to 15 August 2023 in order to ensure full and effective public participation as outlined in the further notice which was published in a national and a local newspaper on 8 June 2023. In addition to the newspaper notice, the owners, lessees and occupiers were notified of this extended deadline by letters dated 13 June 2023 and new site notices, referencing this extended public consultation period, were erected in all 39 locations in place of the original site notices on 8 June 2023.

4.4.101. The NTA have responded to the matters of concern raised in respect of the submission fee for observers, right of reply to NTA response, errors and omissions in plans.

Proposed bus gates

4.4.102. Justification for the hours of operation of the bus gates proposed as part of the Proposed Scheme are set out in Section 4.3.11 of the Preliminary Design Report, included in the Supplementary Information to the application.

4.4.103. The two proposed bus gates will be operational between 06:00 and 20:00 seven days a week. An analysis of existing traffic flow levels on the corridor do not show a significant reduction in traffic volumes through the day (relative to peak

hours), and hence bus gate operation during the hours between 06:00 and 20:00 seven days a week, is necessary to provide fast, reliable bus journey times for all services.

- 4.4.104. A bus gate is proposed on Templeogue Road between Olney Grove and Terenure Road West. This results in a shared inbound lane for buses and general traffic on Templeogue Road from Fortfield Avenue to Terenure Place - which is approximately 1.2km in length.
- 4.4.105. A second bus gate is proposed on Rathmines Road Lower between Richmond Hill and Lissenfield. This results in a shared lane in each direction for buses and general traffic on Rathmines Road Lower from Castlewood Avenue to Grove Road - which is approximately 840m in length. This proposal also allows for some increase to footpath widths through Rathmines and the provision of 2m wide cycle tracks in each direction through the village.
- 4.4.106. It is submitted that while the proposed bus gate on Rathmines Road Lower may result in an inconvenience for those seeking to access businesses, community or residential premises by car in Rathmines, vehicular access will be retained via routes from all directions.
- 4.4.107. The response to observations submits that impact on private vehicles passing through Terenure and Rathmines community area is considered Negative, Not Significant to Slight and Long-Term. The bus gates are not expected to have a significant impact on private vehicles accessing commercial businesses along these stretches of roads due to the lack of on-street parking provision, however they will impact accessibility in terms of lengthened and re-routed journeys. The impact on access to commercial businesses along the Proposed Scheme for private vehicles is considered to be Positive, Moderate and Long-Term. The community areas that are expected to experience this impact are Willington, Templeogue, Rathfarnham, Terenure, Rathgar, Harolds Cross, Rathmines, Harrington Street, Whitefriar Street and Meath Street and Merchants Quay. The impact on access to commercial businesses in the surrounding road network, a result of redistributed traffic, is considered to be Negative, Slight and Long-Term. The community areas that are expected to experience this impact as a result of changes in access to commercial businesses during the Operational Phase of the Proposed Scheme are those

situated away from the Proposed Scheme, namely Knocklyon, Firhouse, Tallaght Tymon, Ballyroan, Churchtown and Francis Street.

Traffic safety and access and egress arrangements from residential entrances.

- 4.4.108. The applicant submits that the principle of how residents can access/egress their property is unchanged by the scheme proposals. The existing access/egress scenario is similar to the proposed with the requirement for a vehicle to be driven across a cycle lane/cycle track and footpath.
- 4.4.109. It is submitted that the scheme has been examined in respect of any adverse effect on road safety and considers the perspective of all road users. All recommended measures or alternative measures proposed by the designer were accepted by the Road Safety Audit Team.
- 4.4.110. The NTA response indicates that the Proposed Scheme design has fully considered the engineering requirements along Rathfarnham Road (from No 51 – 71) to both minimise the impact of the Proposed Scheme on adjacent properties and facilitate no increase to the maximum gradients within these properties.

Visual impact, Loss of privacy, garden space

- 4.4.111. The NTA notes comments raised in respect of impact upon visual amenity. The response to the submission's notes impact of the proposed scheme upon protected structures and their settings, non-protected structures and their settings, ACA's and CA's.
- 4.4.112. The NTA submit that the potential townscape / streetscape and visual impact of the Construction Phase is in the main assessed to be Negative, Very Significant and Temporary / Short-Term. They also respond to observations stating that the potential townscape / streetscape and visual impact of the Operational Phase in the main is assessed to be Negative, Significant and Short-Term becoming Neutral, Moderate and Long-Term.
- 4.4.113. They submit that 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 provision of bus shelters in proximity to buildings of architectural significance, has been assessed in EIAR Volume 2, Chapter 16

Architectural Heritage. The applicant submits that the magnitude of impact is Low as these architectural heritage structures will be set back from the road behind their boundary treatments which will limit the visual impact of the shelters. The potential Operational Phase impact is assessed as Indirect, Negative, Slight, Long-term visual impact on the structures.

- 4.4.114. The NTA note that construction of the Proposed Scheme will require removal of existing trees and other plantings at specific locations along the road corridor. These include trees and plantings around Rathfarnham Castle, some street trees and from many properties along the corridor of the Proposed Scheme, including loss of prominent mature specimens. The sensitivity is assessed as high, and the magnitude of change is high / very high. The townscape and visual impact of the Construction Phase on trees and plantings is assessed to be Negative, Significant / Very Significant and Temporary / Short-Term.
- 4.4.115. It is noted that there will be a change at Rathfarnham Castle, a National Monument and Protected Structure, most notably there will be continuing adverse effects from loss of land and from trees removed during the Construction Phase. However, there will be provision of substantial tree planting to consolidate the woodland edge to the demesne, which will reduce the negative effects over the long-term. The provision of a new cohesive boundary wall in a material sympathetic to the construction of the castle itself will be a positive impact. Overall the effect will be initially negative in the short-term becoming neutral over the long-term. The sensitivity is high and the magnitude of change is high. The potential townscape / streetscape and visual impact of the Operational Phase on Rathfarnham Castle is assessed to be Negative, Significant and Short-Term becoming Neutral, Moderate / Significant and Long-Term.
- 4.4.116. The NTA response submits that operation of the Proposed Scheme will require the permanent acquisition from 72no. residential properties. There will be land take from 15 residential properties on Templeogue Road. The houses have matured established gardens with boundary railings / walls, entrances / gates and associated lawns and plantings. There will be continuing effects from permanent loss of land area and trees which were removed during the Construction Phase. However, there will be like-for-like reinstatement of boundaries, planting and, in most cases, the planting of new street trees in similar locations to those removed, which will reduce negative effects over the long-term. The sensitivity is high, and the magnitude

of change is very high. The potential townscape / streetscape and visual impact of the Operational Phase on these residential properties is assessed to be Negative, Very Significant and Short-Term becoming Negative, Moderate / Significant and Long-Term. Reinstatement of property frontage including boundary walls, gates, railings, and landscaping will be on a like-for-like basis and detailed accommodation works plans will be prepared in consultation with landowners in line with any formal agreements and in accordance with any embedded mitigations identified in the EIAR or conditions/modifications from An Bord Pleanála in relation to the Proposed Scheme application.

Noise & Vibration and Air pollution

- 4.4.117. In relation to the impact of the Proposed Scheme on noise and vibration, these impacts have been assessed and are reported in Chapter 9 Noise and Vibration of Volume 2 of the EIAR. The traffic noise impacts associated with the Proposed Scheme have fully considered any physical changes along the Proposed Scheme. Section 9.4.4.1 of EIAR Volume 2 Chapter 9 Noise and Vibration provides details of the assessment undertaken for the Operational Phase of the Proposed Scheme in respect of the potential noise and vibration impacts associated with altered traffic flows, realigned traffic lanes and displaced traffic flows.
- 4.4.118. Section 9.4.4.1.1.5 states that “Along the majority of roads of the proposed scheme within the 1km study area, impacts as a result of traffic redistribution are determined as indirect, positive, imperceptible to slight, and short to medium term to negative, slight to moderate, and short to medium term once the Proposed Scheme becomes operational.” It goes on to state that “There are a small number of roads in the overall study area where there are potential initial significant impacts. These are defined as roads with a traffic noise level above a daytime noise level of 55 dB LAeq,16hr an increase in noise level greater than 3 dB”. Table 9.39 of the EIAR lists these roads as Grantham Street, Palmerstown Park, Grove Park, Palmerstown Road and Castlewood Park.
- 4.4.119. In the year of opening, 2028, along Orwell Road, the short-term change in traffic noise is defined as moderate with a traffic noise level calculated at the closest NSLs along this road categorised as negligible to low. The overall impact is determined to be indirect, negative, not significant to slight and short to medium-term.

- 4.4.120. Along Grantham Street, Palmerstown Park, Grove Park and Palmerstown Road, the short-term change in traffic noise is defined as moderate with a traffic noise level calculated at the closest NSLs along these roads categorised as low to medium. The overall impact is determined to be indirect, negative, slight to moderate and short to medium-term.
- 4.4.121. Along Castlewood Park, the short-term change in traffic noise is defined as major with a traffic noise level calculated at the closest NSLs along this road categorised as low to medium. The overall impact is determined to be indirect, negative, moderate and short to medium-term.
- 4.4.122. The traffic noise levels of 53 to 59 dB LAeq, 16hr at the closest NSLs along the roads discussed in Table 9.39 are typical of the semi-urban to urban environments in which they are located, and are also in line with road traffic noise levels in the surrounding environment, as discussed in Section 9.3. The operational noise levels will be below and up to 4 dB above the desirable low noise threshold values set within the Dublin Agglomeration NAP 2018 – 2023 (DCC; FCC; SDCC; DLRCC 2018) and are significantly below the Undesirable High noise threshold.
- 4.4.123. For all other roads off the Proposed Scheme, impacts are determined to be indirect, positive, imperceptible to slight, and short to medium term to negative, slight to moderate, and short to medium term.
- 4.4.124. In addition to the above, section 9.4.4.1.1.6 comments on the future electric vehicle fleet and the impact this would have on overall noise levels.
- 4.4.125. In relation to air pollution, EIAR Chapter 7 Air Quality provides details of the air quality assessment undertaken for the Proposed Scheme. Overall, the assessment concluded that the residual effects on air quality as a result of the Proposed Scheme's operation are neutral and long-term.

Impact on property values

- 4.4.126. The NTA submit that evidence shows that investing in public realm creates nicer places that are more desirable for people and business to locate in, thereby increasing the value of properties in the area. Also, that residents along the corridors will see a measurable increase in their quality of life, with evidence showing that residents are willing to pay more for an improved public realm.

4.4.127. It is submitted that a combination of improved connectivity as a result of the dedicated public transport infrastructure being rolled out by the Proposed Scheme as well as public realm improvements, will not have a negative impact on values of residential properties

Issue of enforcement of bus lanes, bus gates and turn bans

4.4.128. The NTA acknowledges the comments raised in relation to camera enforcement. Whilst enforcement for the lawful use of bus lanes is currently a matter for An Garda Síochána, the NTA is separately exploring proposals and methods for bus lane enforcement as set out under Measure INT24 – Enforcement of Road Traffic Laws of the Greater Dublin Area Transport Strategy 2022-2042.

4.4.129. The response submits that with the state having incurred the very large expenditure required to deliver the BusConnects Programme, it is vital to ensure that sufficient enforcement is in place such that the benefits of that investment are not eroded by widespread breaches of the restrictions applying to bus lanes, cycle tracks and junctions. To effectively ensure this outcome, camera-based enforcement will be required to augment the on-street activities of An Garda Síochána.

4.4.130. The NTA note this type of arrangement is in place in many jurisdictions internationally, where camera detection of certain breaches of regulations is linked to the automatic issue of fixed penalty notices.

4.4.131. Action 67 in the Road Safety Strategy Phase 1 Action Plan 2021–2024 sets out the need to “further develop camera-based enforcement by the Gardaí, including at junctions and for management of bus/cycle lanes, building on existing and recent legislation through establishing suitable cross-agency administrative arrangements; and, where any legislative issues are identified, to consider and develop agreed proposals to remedy them.”

4.4.132. The Department of Transport has requested the NTA to undertake the first phase of this action, namely to establish and chair a working group to explore this action and to bring forward recommendations on how it should be progressed. The subsequent steps for implementation, including addressing any legislative issues that may be identified, will be determined by the Department of Transport subsequent to

the initial phase. It is expected that the report of the Working Group will be finalised and provided to the Department later this year.

*Inspectors Note: Action 67 of The Road Safety Strategy Phase 1 Action Plan 2021–2024 was due Q4 of 2022. Phase 2 of the Action Plan runs from 2025 – 2028 and Phase 3 of the Action Pan 2028 – 2030.

- 4.4.133. Notwithstanding this, the NTA submit that, specific measures have been considered in the development of the Proposed Scheme that will help deter inappropriate and unlawful use of bus lanes including advanced bus signal detection systems which will activate green signals at traffic lights for authorised vehicles only.

Quantum of bicycle parking

- 4.4.134. The NTA response sets out that as noted in Section 4.6.4 of Chapter 4 of Volume 2 of the EIAR, bike racks will generally be provided, where practicable, at Bus Stops and key additional locations as noted in the Landscaping General Arrangement drawings in Volume 3 of the EIAR. Section 6.4.6.1.6.1 of Chapter 6 of Volume 2 of the EIAR notes the following in relation to the provision of cycle parking: “With regards to cycle parking, 220 spaces are provided in the Do Minimum scenario. The Proposed Scheme will increase provision by 49% to a total of 328 spaces across the entire corridor in the Do Something scenario.”

Filtered Permeability

- 4.4.135. The NTA notes the support for the proposed filtered permeability measures at Lennox Street and Mountpleasant Avenue Lower.

- 4.4.136. It is submitted that filtered permeability has not been used in all locations in order to maintain an appropriate level of access for local residents. Closer to the city centre, where the road network is dense, there are often multiple alternative routes which residents can take to get to their properties, however further out of the city centre the provision of filtered permeability would result in excessive diversions for local residents.

- 4.4.137. Proposed turn bans will mitigate through traffic from making these turns, while still allowing local residents to access their properties by alternative routes, and to exit their properties.

Achieving National Mobility Policy Targets

- 4.4.138. The NTA acknowledges the Dublin Cycling Campaign submission regarding the approach to categorising cyclists by characteristic type and notes that there are multiple industry studies that have taken a similar approach, however, the Proposed Scheme has not set out to target any particular cycling cohort. The Proposed Scheme will provide a safe, sustainable transport corridor that can provide a sustainable alternative mode of transport for all ages and abilities. Comments raised in relation to the recently published National Sustainable Mobility Policy are noted and it is submitted that the Proposed Scheme's aim and objectives have a direct alignment to the objectives that underpin this policy.
- 4.4.139. The Disability Act 2005 (as amended) places a statutory obligation on public service providers to consider the needs of disabled people. An Accessibility Audit of the existing environment and proposed draft preliminary design for the corridor was undertaken. The Accessibility Audit provided a description of the key accessibility features and potential barriers to mobility impaired people based on the Universal Design standards of good practice. The Accessibility Audit was undertaken in the early design stages with the view to implementing any key measures identified as part of the design development process.
- 4.4.140. In achieving the enhanced pedestrian facilities there has been a concerted effort made to provide clear segregation of modes at key interaction points along the Proposed Scheme which was highlighted as a potential mobility constraint in the Accessibility Audit. In addressing one of the key aspects to segregation, the use of the 60mm set down kerb between the footway and the cycle track is of particular importance for guide dogs, whereby the use of white line segregation is not as effective for establishing a clear understanding of the change of pavement use and potential for cyclist/pedestrian interactions.
- 4.4.141. One of the other key areas that was focused on was the interaction between pedestrians, cyclists and buses at bus stops. The Proposed Scheme has implemented the use of island bus stops, including signal call button for crossing of cycle tracks, to manage the interaction between the various modes with the view to providing a balanced safe solution for all modes.

Universal Design

4.4.142. The NTA submit that the aim of the Proposed Scheme is to provide enhanced walking, cycling and bus infrastructure. In achieving this aim, the Proposed Scheme has been developed using the PDGB and in accordance with the principles of DMURS and Building for Everyone: A Universal Design Approach (NDA 2020). The following non exhaustive list of relevant standards and guidelines have informed the approach to Universal Design in developing the Proposed Scheme:

- Preliminary Design Guidance Booklet for BusConnects Core Bus Corridors (NTA 2020);
- Building for Everyone: A Universal Design Approach (NDA 2020);
- How Walkable is Your Town? (NDA 2015);
- Shared Space, Shared Surfaces and Home Zones from a Universal Design Approach for the Urban Environment in Ireland (NDA 2012);
- Best Practice Guidelines, Designing Accessible Environments. Irish Wheelchair Association (IWA) (IWA 2020).;
- UK DfT Inclusive Mobility (UK DfT 2005);
- UK DfT Guidance on the use of tactile paving surfaces (UK DfT 2007); and
- BS8300:2018 Volume 1 Design of an accessible and inclusive built environment. External Environment- code of practice (BSI 2012)

Cycle Track Segregation & Widths

4.4.143. One of the main outcomes of the Proposed Scheme is safe, segregated cycling facilities which are accessible to all along the corridor. As set out in the PDGB and in accordance with the NCM width calculator, the desirable minimum width for a single-direction, with-flow, raised adjacent cycle track is 2.0m, to provide a high Quality of Service and allow for overtaking within the cycle track, as well as to cater for larger cycles. Notwithstanding this aspiration, it is acknowledged that the Proposed Scheme is to be delivered in constrained urban environments, and the delivery of a 2.0m+ wide cycle track may not always be practicable. As such, the cycle track widths have been reduced to typically 1.8m or 1.5m wide where the provision of 2.0m wide cycle tracks is not practicable.

- 4.4.144. Whilst cycles can come in a range of shapes and sizes (for example standard, tandem, recumbent, cargo, handcycle, wheelchair user tricycle, articulated bikes with additional child trailer or trailer bikes), these cycles are typically less than 1m in width and will be accommodated by the Proposed Scheme.
- 4.4.145. The submission notes three locations in particular where cycle tracks of less than 2.0m wide are proposed, namely:
- Rathfarnham Road;
 - Rathgar Road; and
 - Camden Street Lower.
- 4.4.146. The NTA note that each of these locations are particularly constrained in terms of the available cross-sectional width and an extensive options selection has been carried out to determine the preferred cross-section. This option selection is documented in Chapter 3 – Consideration of Reasonable Alternatives, in Volume 2 of the EIAR
- 4.4.147. The NTA submits that the existing scenario, 28% of cycling facilities, covering 11km in both directions, are segregated. However, under the Proposed Scheme, 85.4% of cycling facilities will be segregated, totalling 23.3km. This represents a substantial 112% increase in segregated cycling facilities along the proposed route.

Pedestrian Crossings and Footpath Width

- 4.4.148. The Proposed Scheme will increase the number of controlled pedestrian crossings from 76 in the Do Minimum to 106 in the Do Something scenario, equating to a 39% increase. Additionally, there will be an increase in the number of raised table crossings on side roads from 30 in the Do Minimum to 105 in the Do Something scenario, equating to a 250% increase.
- 4.4.149. It is further noted that the Proposed Scheme proposes to increase footpath widths at critical locations with high pedestrian demand, such as on Rathmines Road Lower and in Terenure Village. Chapter 6 of the EIAR outlines a Level of Service (LoS) assessment carried out in respect of pedestrian facilities. Section 6.4.6.2 of

Chapter 6 notes the following in relation to the assessment of Pedestrian Infrastructure:

“The Proposed Scheme consists of measures to enhance the existing pedestrian infrastructure along the direct study area. A Level of Service (LoS) junction assessment was undertaken using a set of five criteria to determine the impact that the Proposed Scheme has for pedestrians. The results of the impacted junctions demonstrate that the LoS during the Do Minimum scenario consists predominantly of the low C/ D / E ratings. During the Do Something scenario, i.e. following the development of the Proposed Scheme, the LoS consists predominantly of the highest A / B ratings, with the exception of two Cs”.

4.4.150. It is submitted that overall, the improvements to the quality of the pedestrian infrastructure will have a Positive, Significant and Long-term effect in all four sections of the Proposed Scheme.

Bus Journey Time

4.4.151. It is proposed to provide continuous bus priority, as far as is practicable, along the core bus routes, with the objective of supporting a more efficient and reliable bus service with lower journey times, increasing the attractiveness of public transport in these areas and facilitating a shift to more sustainable modes of transport. To facilitate this scheme objective, at constrained locations bus priority signalling has been proposed wherein general traffic will be managed by signals to facilitate bus priority. Also at constrained sections where a segregated cycle track could not be achieved, a shared bus/cycle lane is proposed.

4.4.152. It is submitted that a balanced approach has been taken in selecting the Preferred Route Option. In some locations this has resulted in no segregated cycle facility being provided. It is noted that in these areas, cyclists will share with the bus lane and the speed limit has been reduced to 30km/h.

4.4.153. Based on the results presented in Table 6.72 modelling of the EIAR it is submitted that the Proposed Scheme will reduce total bus journey times along the Proposed Scheme by up to 12% in 2028 and 9% in 2043. Based on the AM and PM peak hours alone, this equates to 7.4 hours of savings in 2028 and 6.2 hours in 2043 combined across all buses when compared to the Do Minimum. On an annual basis this equates to approximately 5,600 hours of bus vehicle savings in 2028 and 7,700 hours in 2043, when considering weekday peak periods only.

Public Consultation

4.4.154. A number of submissions raised concerns in relation to the quality of consultation and communication with residents. Three rounds of consultation were undertaken with a number of methods used including:

- Dedicated website,
 - Brochure for the development,
 - Public information events – in person for 1st and 2nd round and virtual for 3rd.
 - Public representatives' engagement,
 - Community forum events with representatives of the community – in persons for 1st and 2nd and virtual for 3rd, average attendance for these was 285.
 - Social media coverage,
 - Papers,
 - Press and radio
 - Emails, and Freephone service (1800 303 653) and Post Channels
 - Outdoor advertising,
 - Presentations and infographics
- First non-statutory round of public consultation took place from 14th November 2018 to the 29th March 2019. The first Community Forum meeting for the Tallaght to Terenure Core Bus Corridor took place on 25 February 2019 at St Mary's RFC, Templeville Road from 18.30 – 20.00 with approximately 200 representatives in attendance. The first Community Forum meeting for the Rathfarnham to City Centre Core Bus Corridor took place on 11 February 2019 at the Hilton Hotel, Charlemont from 18.30 – 20.00 with approximately 240 representatives in attendance.
 - The second Community Forum for the Tallaght to Terenure Core Bus Corridor was held in St Mary's RFC, Templeville Road on 16 September 2019 from 18.30 – 20.00, with approximately 195 in attendance. The second Community Forum for the Rathfarnham to City Centre Core Bus Corridor was held in the Hilton

Hotel, Charlemont on 17 October 2019 from 18.30 – 20.00, with approximately 220 in attendance.

- For the Tallaght to Terenure Core Bus Corridor, a dedicated information event was held at St Mary's RFC, Templeville Road on 7 March 2019 from 15.00-20.00. In relation to the Rathfarnham to City Centre Core Bus Corridor, a dedicated information event was held at Hilton Hotel, Charlemont Place on 11 March 2019 from 15.00-20.00. A subsequent information event covering all of the CBCs for Phase 2 took place at the Dublin City Council Civic Offices on 12 March 2019 from 15.00 – 20.00.
- In March 2020, the Draft Preferred Route Option was published and a public consultation covering the Preferred Route Option for each CBC including the Tallaght to Terenure and Rathfarnham to City Centre Core Bus Corridors commenced on 04 March 2020 and ran until 17 April 2020. The consultation was announced via press release and a media briefing that took place in the Alex Hotel, Fenian Street from 10.00 – 12.00.
- Due to the COVID-19 pandemic, all events scheduled after 12 March 2020 were cancelled. In deference to the submissions the NTA had already received, the decision was made not to cancel the consultation. Consequently, there were just 27 submissions received relating to the Tallaght to Terenure Core Bus Corridor and 71 submissions received for the Rathfarnham to City Centre Core Bus Corridor. These submissions ranged from individual submissions by residents, commuters and local representatives, to detailed proposals from various associations and private sector businesses.
- The third round of non-statutory public consultation for the CBC Infrastructure Works took place from 4th November 2020 until 16th December 2020 on the updated Draft Preferred Route Option, including for the Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme. With the continuing effect of the Covid-19 pandemic and associated Government restrictions, the third Public Consultation was held largely virtually. Regular consultation communication methods were adapted to allow the process to take place using virtual and online facilities. The consultation was announced via press release, on the Busconnects website and on social media.

- The applicant utilised a primary virtual interactive tool during the final third phase of public consultation which was the use of virtual consultation rooms available through the BusConnects website. These rooms were online for a six week period (24hrs x 7 days a week) and included the following:
 - all Scheme materials available for perusal, such as the brochure, maps and all associated support documentation;
 - an audio description of the brochure information; and
 - a call back facility within the virtual rooms for any stakeholder to book a phone call back from a member of the BusConnects Infrastructure team for additional information or more detailed queries.

4.4.155. Over the seven weeks of the consultation, 435 unique users visited the virtual information room for the Tallaght to Terenure Core Bus Corridor scheme. 825 unique users visited the virtual information room for the Rathfarnham to City Centre Core Bus Corridor scheme.

4.4.156. In addition, a third, virtual, Community Forum meeting took place for the Tallaght to Terenure Core Bus Corridor Community Forum on 19 November 2020 from 18.30 – 20.00 with approximately 170 representatives in attendance. And a third Community Forum meeting took place on 26 November 2020 from 18.30 – 20.00 for the Rathfarnham to City Centre on Core Bus Corridor, with approximately 200 representatives in attendance.

4.4.157. Throughout the CBC Infrastructure Works, residents' groups have been engaged with. Members of the BusConnects Infrastructure team had Zoom meetings with representatives of the Rathfarnham Road Residents Association, Terenure Residents Association, Rathfarnham Road Group (South of Dodder), Templeogue Road Residents Group, Castlewood Avenue Residents (Rathmines), Rathfarnham Mill, Woodview Cottages & Owendore Residents and a number of other groups along Templeogue Road throughout 2020 and 2021 to discuss the proposals on the Templeogue/Rathfarnham to City Centre Core Bus Corridor scheme.

4.5. Planning History

4.6. There are a significant number of planning applications along the route which include large residential, domestic residential such as alterations to existing houses, commercial development and telecommunication infrastructure etc, a full list is provided by the applicant within Appendix 2 of the Planning Report document submitted with the application. Of relevance to this scheme and including a number referred to by Dublin City Council within their submission to the application is the following:

- 2769/21 Permission granted for Permission for a Build-To-Rent residential development at No. 348 Harold's Cross Road, Dublin 6, D6W VW99. Construction of a part-two, part-three, part-four, part-five storey building (total gross floor area of c. 5,163 sqm); comprising 52 no. apartments.
- 3379/19 189 & 190, Rathgar Road, Dublin 6 demolition of the existing buildings, and construction of a 4 storey over basement apartment building with 22 apartments.
- 3381/20 189-190, Rathgar Road, Rathmines, Dublin 6. Permission granted for demolition of buildings and construction of four storey with setback fifth storey apartment block containing 29 no. apartments.
- 2550/19 Permission granted for the demolition of all buildings on site erection of a building (three storey facing 201-203, Rathmines Road Lower and four storey to the rear) comprising: (a) commercial cafe/ restaurant at lower ground/ground floor level, and (b) 3 no. residential apartments at first/second floor level including 1 no. studio apartment, 1 no. two-bedroom apartment and 1 no. three bedroom apartment (each to be served by either a private courtyard or private balcony);
- 3389/15 Permission granted for demolition of No. 46 Lower Rathmines Road and a derelict mews building; and the refurbishment of existing Nos. 40, 42 and 44 Lower Rathmines Road (protected structures) and the construction of two new additional buildings creating:
- Building A – comprising 74 unit student residential complex, with associated communal living accommodation.

Building B - comprising of 8 student residential units with associated communal living room, kitchen dining areas and laundry facilities with caretaker accommodation located at lower ground level.

- 3546/21 Permission granted at 17-19 Richmond Street South and 14 Gordon Place, Dublin 2 for demolition of existing structures and construction of a new mixed-use development, 'The Gatehouse', 6-storeys (max. parapet height 21.025 m) over ground-level fronting onto Richmond St. South and 7-storeys (max. parapet height 23.8m) over ground-level to the rear with a cumulative Gross Floor Area of 2,341m².
- 2546/18 Site generally bound by Charlemont Street to the east, Harcourt Road to the north and Richmond Street South to the west, Dublin 2. The application site contains four Protected Structures: 5 Charlemont Street (RPS Ref. 1350); 6 Charlemont Street (RPS Ref. 1351); 7 Charlemont Street (RPS Ref. 1352); and 8 Charlemont Street (RPS Ref.1353). The development consists of the following: (i) The provision of a part 7, part 8 and part 9 storey with set backs at various levels over two level basement office development (26,350 sq.m GFA offices; 6,904 sq. GFA basements) with retail/cafe/restaurant units. The overall development consists of a total 34,526 sq.m GFA.
- 2412/20 No.45-47 Cuffe Street (Greenside House), fronting Montague Court and Protestant Row. Permission granted for (i) Demolition of existing structures on site. (ii) Construction of an 8 storey office development over a lower ground floor/basement level.
- 2546/18 No.41 - 46 South Great Georges Street And, 51- 53, Lower Stephen Street, Dublin 2. Permission granted for Construction of a 5-storey over single basement structure to include retained facade. The building will comprise a 100 no. bedroom hotel, 1 no. restaurant and 3 no. retail units;
- 4763/22 The Central Hotel, Nos 1-5, Exchequer Street and Nos 11, 14, 15 & 16 South George's Street and No.12 Dame Court, Dublin 2. Permission granted for the refurbishment/reconfiguration, partial sundry demolition and expansion of the Central Hotel (a protected structure RPS. Ref. No. 2719} to result in an overall amalgamated hotel of 6,676.5 sq.m. with a total of 129 no.

bedrooms within 5 storeys over basement with a 6 storey element with plant level (above No.12 Dame Court).

5.0 Policy Context

5.1. European

5.1.1. Sustainable and Smart Mobility Strategy 2020 (EU Commission 2020)

The Smart and Mobility Strategy is part of the EU Green Deal and aims to reduce transport emissions by 90% until 2050. The Commission intends to adopt a comprehensive strategy to meet this target and ensure that the EU transport sector is fit for a clean, digital and modern economy. Objectives include:

- increasing the uptake of zero-emission vehicles
- making sustainable alternative solutions available to the public & businesses
- supporting digitalisation & automation
- improving connectivity & access.

5.1.2. European Green Deal (EDG) 2019

The European Commission has adopted a set of proposals such as making transport sustainable for all, to make the EU's climate, energy, transport and taxation **policies fit for reducing net greenhouse gas emissions by at least 55% by 2030**, compared to 1990 levels.

5.1.3. Towards a fair and sustainable Europe 2050: Social and Economic choices in sustainability transitions, 2023.

This foresight study looks at sustainability from a holistic perspective but emphasises the changes that European economic and social systems should make to address sustainability transitions. The EU has committed to sustainability and sustainable development, covering the three dimensions (environmental, social and economic) of sustainability. Transport is identified as an area of opportunity to increase the speed of a cultural shift towards sustainability. The provision of well planned, affordable or free public transport system and bicycle lanes are encouraged.

5.2. National

5.2.1. National Sustainable Mobility Policy, 2022

The purpose of this document is to set out a strategic framework to 2030 for active travel and public transport to support Ireland's overall requirement to achieve a 51% reduction in carbon emissions by the end of this decade.

A key objective of the document is to expand the bus capacity and services through the BusConnects Programmes in the five cities of Cork, Dublin, Galway, Limerick and Waterford; improved town bus services; and the Connecting Ireland programme in rural areas.

5.2.2. National Sustainable Mobility Policy Action Plan 2022-2025

BusConnects is identified as a key project to be delivered within 2025.

5.2.3. Permeability in Existing Urban Areas Best Practice Guide 2015

Among the priorities of the National Transport Authority (NTA) are to encourage the use of more sustainable modes of transport and to ensure that transport considerations are fully addressed as part of land use planning. This guidance demonstrates how best to facilitate demand for walking and cycling in existing built-up areas.

5.2.4. Department of Transport National Sustainable Mobility Policy on 7th April 2022.

The plan, prepared by the Department of Transport, includes actions to improve and expand sustainable mobility options across the country by providing safe, green, accessible and efficient alternatives to car journeys.

- United Nations 2030 Agenda

5.2.5. Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009 – 2020

This is a government document that was prepared in the context of unsustainable transport and travel trends in Ireland. The overall vision set out in this policy document is to achieve a sustainable transport system in Ireland by 2020.

To achieve this the government set out 5 key goals

- (i) to reduce overall travel demand,
- (ii) to maximise the efficiency of the transport network,
- (iii) to reduce reliance on fossil fuels,
- (iv) to reduce transport emissions and
- (v) to improve accessibility to transport.

To achieve these goals and to ensure that we have sustainable travel and transport by 2020, the Government sets targets, which include the following:

- 500,000 more people will take alternative means to commute to work to the extent that the total share of car commuting will drop from 65% to 45%
- Alternatives such as walking, cycling and public transport will be supported and provided to the extent that these will rise to 55% of total commuter journeys to work.

5.2.6. **National Planning Framework Project Ireland 2040**

The National Policy Position establishes the fundamental national objective of achieving transition to a competitive, low carbon, climate resilient and environmentally sustainable economy by 2050,

Managing the challenges of future growth is critical to regional development. A more balanced and sustainable pattern of development, with a greater focus on addressing employment creation, local infrastructure needs and addressing the legacy of rapid growth, must be prioritised. This means that housing development should be primarily based on employment growth, accessibility by sustainable transport modes and quality of life, rather than unsustainable commuting patterns.

National Strategic Outcome 4

- NSO 4 - Dublin and other cities and major urban areas are too heavily dependent on road and private, mainly car based, transport with the result that our roads are becoming more and more congested. The National Development Plan makes provision for investment in public transport and sustainable mobility solutions to progressively put in place a more sustainable alternative. For example, major electric rail public transport infrastructure identified in the Transport Strategy for the Greater Dublin Area to 2035, such as the Metro Link and DART Expansion projects as well as the BusConnects investment programme, will keep our capital and other key urban areas competitive.

- Deliver the key public transport objectives of the Transport Strategy for the Greater Dublin Area 2016-2035 by investing in projects such as New Metro Link, DART Expansion Programme, BusConnects in Dublin and key bus-based projects in the other cities and towns.

5.2.7. National Development Plan 2021-2030

The NDP Review contains a range of investments and measures which will be implemented over the coming years to facilitate the transition to sustainable mobility. These measures include significant expansions to public transport options, including capacity enhancements on current assets and the creation of new public transport links through programmes such as Metrolink.

The NDP recognises Busconnects as one of the Major Regional Investments for the Eastern and Midland Region and this scheme is identified as a Strategic Investment Priority within all five cities.

Over the next 10 years approximately €360 million per annum will be invested in walking and cycling infrastructure in cities, towns and villages across the country.

Transformed active travel and bus infrastructure and services in all five of Ireland's major cities is fundamental to achieving the overarching target of 500,000 additional active travel and public transport journeys by 2030. BusConnects will overhaul the current bus system in all five cities by implementing a network of 'next generation' bus corridors including segregated cycling facilities on the busiest routes to make journeys faster, predictable and reliable.

Over the lifetime of this NDP, there will be significant progress made on delivering BusConnects with the construction of Core Bus Corridors expected to be substantially complete in all five cities by 2030.

5.2.8. National Investment Framework for Transport in Ireland, 2021

One of the key challenges identified within this document relates to transport and the ability to maintain existing transport infrastructure whilst ensuring resilience of the most strategically important parts of the network. Population projections are expected to increase into the future and a consistent issued identified within the five cities of Ireland

is congestion. Given space constraints, urban congestion will primarily have to be addressed by encouraging modal shift to sustainable modes.

Within the cities, frequent and reliable public transport of sufficient capacity and high-quality active travel infrastructure can incentivise people to travel using sustainable modes rather than by car.

Bus Connects is identified as a project which will alleviate congestion and inefficiencies in the bus service. The revised NDP 2021- 2030 sets out details of a new National Active Travel Programme with funding of €360 million annually for the period from 2021 to 2025. A new National Cycling Strategy is to be developed by the end of 2022, and will map existing cycling infrastructure in both urban and rural areas to inform future planning and project delivery decisions in relation to active travel.

5.2.9. **Design Manual for Urban Roads and Streets, 2019**

This Manual provides guidance on how to approach the design of urban streets in a more balanced way. To encourage more sustainable travel patterns and safer streets, the Manual states that designers must place the pedestrian at the top of the user hierarchy, followed by cyclists and public transport, with the private car at the bottom of the hierarchy. The following key design principles are set out to guide a more place-based/ integrated approach to road and street design.

- To support the creation of integrated street networks which primate higher levels of permeability and legibility for all users, and in particular more sustainable forms of transport.
- The promotion of multi functional, placed based streets that balance the needs of all users within a self regulating environment.
- The quality of the street is measured by the quality of the pedestrian environment.
- Greater communication and communication and cooperation between design professionals through the promotion of a plan-led multidisciplinary approach to design.

The manual recommends that bus services should be directed along arterial and link streets and that selective bus detection technology should be considered that prioritises buses. It is noted that under used or unnecessary lanes can serve only to

increase the width of carriageways (encouraging greater speeds) and can consume space that could otherwise be dedicated to placemaking /traffic calming measures.

5.2.10. Climate Action Plan 2024

- The Climate Action Plan (CAP24) sets out a roadmap to halve emissions by 2030 and reach net zero by 2050. CAP24 is the third annual update to Ireland's Climate Action Plan 2019 and the second to be prepared under the Climate Action and Low Carbon Development (Amendment) Act 2021. These national targets align with Ireland's obligations under EU and international treaties, most notably the Paris Agreement (2015) and the European Green Deal (2020)
- Citizen engagement and a strengthened social contract between the Government and the Irish people will be required around climate action. Some sectors and communities will be impacted more than others. A just transition is embedded in CAP24 to equip people with the skills to benefit from change and to acknowledge that costs need to be shared. Large investment will be necessary through public and private sectors to meet CAP24 targets and objectives.
- The electricity sector will help to decarbonise the transport, heating and industry sectors and will face a huge challenge to meet requirements under its own sectoral emissions ceiling. CAP24 reframes the previous pathway outlined in CAP21 under the Avoid-Shift-Improve Framework to achieve a net zero decarbonisation pathway for transport. This is a hierarchical framework which prioritises actions to reduce or **avoid** the need to travel; **shift** to more environmentally friendly modes; and **improve** the energy efficiency of vehicle technology.
- Road space reallocation is a measure outlined under both 'avoid' and 'shift' to promote active travel and modal shift to public transport. It is recognised that road space reallocation can redirect valuable space from on-street car-parking and public urban roadways to public transport and active travel infrastructure (such as efficient bus lanes, and more spacious footpaths and segregated cycle-lanes), whilst also leading to significant and wide-scale improvements in our urban environments. A National Demand Management Strategy is being

developed with the aim of reducing travel demand and improving sustainable mobility alternatives.

- The major public transport infrastructure programme set out in the NDP sets out significant investment in new public transport infrastructure is required to deliver on our carbon emissions reduction targets, and to provide people with the sustainable alternatives to private car usage. Major public transport projects and programmes that are being progressed under the National Development Plan include MetroLink, DART+, BusConnects programmes in all five cities and commuter rail programmes in Cork and Limerick, which have been progressing through major delivery milestones.
- With respect to BusConnects Dublin, the programme as well as the procurement strategy for Next Generation Ticketing has significantly advanced, with five phases of the Network Redesign now live, with significant uplift in passenger numbers observed on these routes. Twelve planning applications have been lodged with An Bord Pleanála since April 2022 in respect of the Core Bus Corridor infrastructure to be delivered in the course of subsequent phases.
- Meeting our 2030 transport abatement targets will require transformational change and accelerated action across the transport sector. Key targets to remain within the sectoral emissions ceiling include a 20% reduction in total vehicle kilometres travelled relative to business-as-usual, a 50% reduction in fossil fuel usage, a significant behavioural shift from private car usage to increase the total share of journeys undertaken by walking, cycling or public transport, and continued electrification of our vehicle fleets. While fleet electrification and the use of renewable transport fuels will continue to provide the greatest share of emissions abatement in the medium term, we will continue to expand our walking, cycling and public transport networks in order to reorient our transport systems to a more sustainable basis and to facilitate widespread behavioural change to a healthier, safer, and more people-focused vision for transport. We will continue to pursue policy measures that promote greater efficiency in our transport system, allied with significant investment in sustainable alternatives, incentives and regulatory measures to promote the accelerated take-up of low carbon technologies.

5.3. Regional

5.3.1. Regional Spatial Economic Strategy for the Eastern and Midlands Region

- Chapter 5 Dublin Metropolitan Area Strategic Plan (MASP)
 - The MASP is an integrated land use and transportation strategy for the Dublin Metropolitan Area that sets out a vision for the future growth of the metropolitan area and key growth enablers.
 - Section 5.3 Guiding Principles for the growth of the Dublin Metropolitan Area - Integrated Transport and Land use which seeks to focus growth along existing and proposed high quality public transport corridors and nodes on the expanding public transport network and to support the delivery and integration of '**BusConnects**', DART expansion and LUAS extension programmes, and Metro Link, while maintaining the capacity and safety of strategic transport networks.
 - MASP Sustainable Transport RPO 5.2: Support the delivery of key sustainable transport projects including Metrolink, DART and LUAS expansion programmes, BusConnects and the Greater Dublin Metropolitan Cycle Network and ensure that future development maximises the efficiency and protects the strategic capacity of the metropolitan area transport network, existing and planned.
 - RPO 5.3: Future development in the Dublin Metropolitan Area shall be planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive street environment for pedestrians and cyclists.
 - Section 5.6 Integrated Land use and Transportation-
 - Key transport infrastructure investments in the metropolitan area as set out in national policy include:
 - Within the Dublin Metropolitan Area, investment in bus based public transport will be delivered through BusConnects, which aims to overhaul the current bus system in the Dublin metropolitan area, including the introduction of Bus Rapid Transit.
- Chapter 8 Connectivity

- Section 8.4 Transport Investment Priorities:
 - Within the Dublin Metropolitan Area, investment in bus infrastructure and services will be delivered through BusConnects.
- Section 8.5 International Connectivity:
 - RPO 8.18: Improved access to Dublin Airport is supported, including Metrolink and improved bus services as part of BusConnects, connections from the road network from the west and north. Improve cycle access to Dublin Airport and surrounding employment locations. Support appropriate levels of car parking and car hire parking.

5.4. Transport Strategy for the Greater Dublin Area 2022-2042

- 5.4.1. The 2022-2042 Transport Strategy sets out a framework for investment in transport infrastructure and services in the Greater Dublin Area (GDA) up to 2042. The Transport Strategy recognises a wide range of challenges for transport underpinned by climate change; the Covid 19 pandemic; servicing the legacy development patterns; revitalising city and town centres; transforming the urban environment; ensuring universal access; serving rural development; improving health and equality; fostering economic development; and delivering transport schemes.
- 5.4.2. The overall aim of the Transport Strategy is “to provide a sustainable, accessible and effective transport system for the Greater Dublin Area which meets the region’s climate change requirements, serves the needs of urban and rural communities, and supports the regional economy.”
- 5.4.3. Chapters 10, 11 and 12 of the Transport Strategy address walking, accessibility, and the public realm; cycling and personal mobility vehicles; and public transport respectively, and these sections relate both directly and indirectly to the proposed BusConnects programme.
- 5.4.4. Chapter 12 sets out the strategy for an overall public transport system for the region, central to which is the delivery of a comprehensive bus network, based on enhanced level of service and much greater on-street priority. Section 12.2.2 of the Transport Strategy notes that BusConnects Dublin comprises a range of elements including approximately 230km of radial bus priority and 200km of cycle routes, a new bus

service network, new bus stops and shelters, low/zero emissions bus fleet, new park and ride interchanges, and a revised fare structure. The Proposed Scheme is one of 12 radial schemes being brought forward under this programme to facilitate faster and more reliable bus journeys on the busiest bus corridors in the Dublin region. Key elements of the Cycle Network Plan will also be delivered along these corridors. The following measures in the Transport Strategy relate to the roll out of BusConnects:

- BUS1 – Core Bus Corridor Programme: Subject to receipt of statutory consents, it is the intention of the NTA to implement the 12 Core Bus Corridors as set out in the BusConnects Dublin programme.
- BUS2 – Additional Radial Core Bus Corridors: It is the intention of the NTA to evaluate the need for, and deliver, additional priority on radial corridors.
- BUS3 – Orbital and Local Bus Routes: It is the intention of the NTA to provide significant improvements to orbital and local bus services in the following ways:
 - Increase frequencies on the BusConnects orbital and local bus services; and
 - Providing bus priority measures at locations on the routes where delays to services are identified.

5.4.5. A new Dublin area bus service network will be arranged on the basis on spines radiating from the city centre, orbitals around the city, other city bound routes, local routes, peak only services, and express routes. Periodic review will take place to implement appropriate additions or adjustments to the overall bus system.

5.4.6. With respect to walking, accessibility, and the public realm, it is recognised in the Transport Strategy that better urban design and placemaking will encourage more people to walk, cycle or use public transport. Specific measures are outlined to incorporate a high standard of urban design and placemaking into major public transport infrastructure schemes and walking and cycling projects, taking account of architectural heritage (PLAN14 and PLAN15 of the Transport Strategy refer). Furthermore, measure PLAN16 seeks the reallocation of road space to prioritise walking, cycling and public transport use and the placemaking functions of the urban street network. Other specific measures relating to walking, accessibility and public

realm include Measure WALK2 – Improved Footpaths; Measure WALK4 – Improved Junctions; Measure WALK6 – Crossing Points; Measure WALK8 – Traffic-Free Streets and Pedestrianisation; and Measure WALK9 – regarding those with disabilities or mobility impairments.

- 5.4.7. In terms of cycling and personalised mobility vehicles, it is the intention of the NTA and the local authorities to deliver a safe, comprehensive, attractive, and legible cycle network in accordance with the updated Greater Dublin Area Cycle Network (Measure CYC1 of the Transport Strategy refers). It is noted that some of the cycle provision included in BusConnects schemes examines the appropriateness of emerging international approaches to design standards. As the number of cyclists grows, the requirement to ensure that cyclists can travel unimpeded along their entire journey becomes critical and this needs to be reflected in how cycle infrastructure and other traffic is managed. This is reflected in the Transport Strategy through Measure CYC2 – Cycle Infrastructure Design; Measure CYC3 – Extended Hours of Operation of Cycle Infrastructure; and Measure CYC4 – Maintenance of Cycle Infrastructure.
- 5.4.8. Chapter 17 provides the outcomes and how the Strategy contributes to an enhanced natural and built environment (consolidated development, public realm and placemaking, reduced impacts of traffic, improved air quality and noise levels); how the Strategy leads to more connected communities and better quality of life (enhanced community interaction, high quality public transport coverage); how the Strategy contributes to a strong and sustainable economy; and how the Strategy fosters an inclusive transport system (equality, health and access to jobs).

5.5. Greater Dublin Area Cycle Network Plan

- 5.5.1. The updated Greater Dublin Area Cycle Network Plan, 2022, is published alongside the Transport Strategy. Cycle facilities proposed under BusConnects will contribute towards the intention of the NTA and local authorities to deliver a safe, comprehensive, attractive and legible cycle network in accordance with the updated Greater Dublin Area Cycle Network.
- 5.5.2. The 2013 Greater Dublin Area Cycle Network Plan included two primary cycle routes along the Proposed Scheme (Cycle Route 9A (TRE & Rathfarnham Road) and Cycle Route 10 (Harcourt Street and Camden Street through Rathmines, Rathgar and

Terenure to Rathfarnham, where it splits into several branches)) and intersection with a number of secondary cycle routes, including Cycle Route 8 (South Great George's Street via the Coombe area) and Cycle Route 9B (Tallaght along Clanbrassil Street and through Harold's Cross) and Secondary Route S04 of the GDA (from Dundrum, Churchtown and Nutgrove through Rathfarnham and Templeogue to Greenhills and Walkinstown).

- 5.5.3. The updated 2022 GDA Cycle Network Plan shows the CBC as a primary radial cycle route from Rathfarnham / Butterfield Avenue to city centre, from Harolds Cross to Terenure and from Spawell, Templeogue to Terenure. A number of feeder routes intersect with the CBC at Rathfarnham, Terenure, Rathgar, Harolds Cross, Rathmines and Grand Canal / Grove Road.
- 5.5.4. The Proposed Scheme will help to deliver the Cycle Network through installation of cycle tracks and safer junctions, many of which are located at intersections with other routes in the network e.g. the proposed scheme crosses and will tie in with the Dodder Greenway cycle route at Pierse Bridge. In addition to the above, an alternative cycle facility identified as a 'Feeder' Route in the 2022 GDA Cycle Network Plan – Dublin SE will be provided along Bushy Park Road, Wasdale Park, Wasdale Grove, Zion Road and Orwell Road. As stated above the route proposed along Harold's Cross Road / Terenure Road North between Terenure Cross and Parkview Avenue is identified as a 'Primary Radial' Route.

5.6. Cycle Design Manual, September 2023

- 5.6.1. The Cycle Design Manual 2023 replaced the previous 2011 National Cycle Manual and draws on the experience of cycle infrastructure development over the past decade and international best practice to help deliver safe cycle facilities for people of all ages and abilities. The Manual is intended as a live document that will be updated to reflect emerging best practice.
- 5.6.2. Chapter 2 of the Manual sets out the five main requirements (safety, coherence, directness, comfort, and attractiveness) that designs should fulfil to cater for existing cyclists and to attract new cyclists to the network. Key design principles include a network approach, segregation, and inclusive mobility. Information is also provided on the types of cycle vehicles, cycle links, appropriate facilities, and width calculations.

- 5.6.3. Chapter 3 of the Manual addresses cycle network planning, as well as the planning of cycling in private developments and public infrastructure projects. Designing for cycling is covered in Chapter 4,
- 5.6.4. The Manual makes a single reference to BusConnects under protected junctions, where it is noted that a small number of such junctions have been implemented in Ireland and many more are currently being planned under active travel schemes around the country and on BusConnects corridors in Dublin and regional cities. The Manual anticipates that the continued rollout of protected junctions will improve junction consistency and coherence on the cycle network.

5.7. Design Manual for Urban Roads and Streets, 2019

- 5.7.1. This Manual provides guidance on how to approach the design of urban streets in a more balanced way. To encourage more sustainable travel patterns and safer streets, the Manual states that designers must place the pedestrian at the top of the user hierarchy, followed by cyclists and public transport, with the private car at the bottom of the hierarchy. The following key design principles are set out to guide a more place-based/ integrated approach to road and street design.
- To support the creation of integrated street networks which promote higher levels of permeability and legibility for all users, and in particular more sustainable forms of transport.
 - The promotion of multi-functional, place-based streets that balance the needs of all users within a self-regulating environment.
 - The quality of the street is measured by the quality of the pedestrian environment.
 - Greater communication and communication and cooperation between design professionals through the promotion of a plan-led multidisciplinary approach to design.
- 5.7.2. The Manual recommends that bus services should be directed along arterial and link streets and that selective bus detection technology should be considered that prioritises buses. It is noted that under used or unnecessary lanes can serve only to increase the width of carriageways (encouraging greater speeds) and can consume space that could otherwise be dedicated to placemaking /traffic calming measures.

5.8. Local

Inspectors Note: The route traverses both Dublin City Council and South Dublin County Council administrative areas, with the boundary between both Local Authorities located close to the Fortfield Road junction for the Templeogue to Terenure section and at the River Dodder for the Rathfarnham to City Centre section. The relevant development plans of both local authorities have been examined.

I note the Dun Laoghaire Rathdown Administrative Boundary runs to east of Rathfarnham and comes close to Rathfarnham Wood, including a portion of Nutgrove Avenue. The subject proposed scheme ties into the Dun Laoghaire Rathdown County Council area, where there will be changes to a short section of Nutgrove Avenue. From an assessment of Sheet 01 of 42 General Arrangement (GA) Drawings the proposed works, scheme and land acquisition are not located within the administrative boundary of Dun Laoghaire Rathdown.

5.9. Dublin City Development Plan 2022-2028

- 5.9.1. The main strategic approach of the Dublin City Development Plan 2022-2028¹ (DCDP) is to develop a city that is low carbon, sustainable and climate resilient. Chapter 8 of the DCDP relates to sustainable movement and transport, and highlights that the sustainable and efficient movement of people and goods is crucial for the success and vitality of the city, along with the need to move away from private car and fossil-fuel-based mobility to reduce the negative impacts of transport and climate change. Towards this end Objective SMTO01 states: *“To achieve and monitor a transition to more sustainable travel modes including walking, cycling and public transport over the lifetime of the development plan, in line with the city mode share targets of 26% walking/cycling/micro mobility; 57% public transport (bus/rail/Luas); and 17% private (car/van/HGV/motorcycle)”*.
- 5.9.2. Table 8.1 of the DCDP sets out current and target mode share with cycling expected to increase by 7% by 2028 and public transport (bus, rail, and Luas) by 3% in the same timeline. It is stated that the modest increase in public transport mode share anticipates the construction of major public transport infrastructure that is proposed to occur over the lifetime of the plan, and accordingly the impact of public transport

¹ DCDP Adopted on the 2nd of November 2022, came into effect 14th December 2022.

infrastructure projects on modal share is more likely to come into fruition during the lifespan of the following City plan.

5.9.3. 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. In this regard SMT22 - Key Sustainable Transport Projects, *seeks “to support the expeditious delivery of key sustainable transport projects so as to provide an integrated public transport network with efficient interchange between transport modes, serving the existing and future needs of the city and region and to support the integration of existing public transport infrastructure with other transport modes. In particular the following projects subject to environmental requirements and appropriate planning consents being obtained: DART +, Metrolink from Charlemount to Swords, BusConnects Core Bus Corridor projects, Delivery of Luas to Finglas, Progress and delivery of Luas to Poolbeg and Lucan”.*

5.9.4. Section 8.5.3 of the DCDP notes the importance of reducing car dominance and that encouraging walking, cycling and use of public transport as sustainable travel modes requires improving the attractiveness of the environment and public realm within the city and urban villages. It is recognised that there are opportunities for developing the public realm around the City and in the urban villages where new public transport proposals are being developed. The following policies are relevant in this regard:

- Policy SMT12 – Pedestrians and Public Realm: To enhance the attractiveness and liveability of the city through the continued reallocation of space to pedestrians and public realm to provide a safe and comfortable street environment for pedestrians of all ages and abilities.
- Policy SMT13 – Urban Villages and the 15-Minute City: To support the role of the urban villages in contributing to the 15-minute city through improvement of connectivity in particular for active travel and facilitating the delivery of public transport infrastructure and services, and public realm enhancement.

- Policy SMT14 City Centre Road Space: To manage city centre road-space to best address the needs of pedestrians and cyclists, public transport, shared modes, and the private car, in particular, where there are intersections between DART, Luas and Metrolink and with the existing and proposed bus network.
- SMT22 - Key Sustainable Transport Projects: To support the expeditious delivery of key sustainable transport projects so as to provide an integrated public transport network with efficient interchange between transport modes, serving the existing and future needs of the city and region and to support the integration of existing public transport infrastructure with other transport modes. In particular the following projects subject to environmental requirements and appropriate planning consents being obtained:
 - DART +
 - Metrolink from Charlemount to Swords

- BusConnects Core Bus Corridor projects
- Delivery of Luas to Finglas
- Progress and delivery of Luas to Poolbeg and Lucan

5.9.5. The DCDP acknowledges that kerbside space is being continually reduced in favour of transport infrastructure and public realm improvements, and as such, there is very limited capacity on street to meet the servicing requirements of developments. Policy SMT15 – ‘Last-Mile’ Delivery seeks to “...*achieve a significant reduction in the number of motorised delivery vehicles in the City through supporting and promoting the use of the ‘last-mile’ delivery through the development of micro hubs and distribution centres.*”

5.9.6. Other transport policies of relevance to the proposed scheme include the following:

SMT25 – On-Street Parking: “To manage on-street car parking to serve the needs of the city alongside the needs of residents, visitors, businesses, kerbside activity and accessible parking requirements, and to facilitate the re-organisation and loss of spaces to serve sustainable development targets such as in relation to, sustainable transport provision, greening initiatives, sustainable urban drainage, access to new developments, or public realm improvements.”

SMT33 – Design Manual for Urban Roads and Streets: “To design new streets and roads within urban areas in accordance with the principles, approaches and standards contained within the Design Manual for Urban Roads and Streets (DMURS) and to carry out upgrade works to existing road and street networks in accordance with these standards where feasible.

SMT34 – Street and Road Design: To ensure that streets and roads within the city are designed to balance the needs and protect the safety of all road users and promote place making, sustainable movement and road safety providing a street environment that prioritises active travel and public transport whilst ensuring the needs of commercial servicing is accommodated.

5.9.7. The Proposed Scheme, for the most part, will comprise lands within the existing public road and pedestrian pavement area where there is no specific zoning objective.

Zoning objectives that are affected by the proposed scheme include:

- Zone Z1 – Sustainable Residential Neighbourhoods To protect, provide and improve residential amenities.
- Zone Z2 – Residential Neighbourhoods (Conservation Areas) To protect and/or improve the amenities of residential conservation areas.
- Zone Z3 – Neighbourhood Centres To provide for and improve neighbourhood facilities.
- Zone Z4 – District Centres To provide for and improve mixed-services facilities.
- Zone Z6 – Employment / Enterprise To provide for the creation and protection of enterprise and facilitate opportunities for employment creation.
- Zone Z9 – Recreational amenity and open space To preserve, provide and improve recreational amenity and open space and green networks
- Zone Z15 – Institutional and Community To protect and provide for institutional and community uses.

5.9.8. The Terenure to City Centre road is bounded by numerous Protected Structures which are included on the Development Plan Land Use Zoning Maps. Most notably the location where direct impact on the setting and boundaries of Protected Structures will occur is along Terenure Road East (notably, No.'s 74 -78, 59 – 69, & 50 – 62), Aungier Street (No.'s 20 & 21, 10 & 10a, 9 & 9a), Cranford Lodge on Rathgar Road and 48 Harrington Street.

5.9.9. The Proposed Scheme does not pass within or alongside any Strategic Development and Regeneration Areas or “Z8 Georgian Conservation Areas”. It passes through South Great Georges Street Architectural Conservation Area (ACA), and it does pass through areas that have been designated as, Z2 Residential Conservation Areas as well as “red-lined” or “red-hatched” conservation areas in the DCDP. These areas do not have a statutory basis in the same manner as protected structures or ACAs; however, they are recognised within the DCDP as areas that have conservation merit and importance which warrant protection through policy application. The Proposed Scheme passes through such “Red-hatched” conservation areas (CA’s) including Grand Canal CA, Richmond Street to Aungier Street CA and Dame Street CA from Dame Street to Aungier Street.

5.9.10. Policy BHA9 refers to development in such conservation areas and requires, inter-alia that development in such areas must contribute positively and take opportunities to enhance and protect the character and appearance of the area and its setting wherever possible. BHA10 presumes against demolition or substantial loss of a structure that contributes to the character of a conservation area.

5.9.11. As stated, the proposed scheme passes a number of protected structures, Policy BHA2 of the DCDP relates to development of protected structures and requires that development will conserve and enhance protected structures and their curtilage, and inter-alia:

- Protect structures included on the RPS from any works that would negatively impact their special character and appearance,
- Ensure that any modification affecting a protected structure and/or its setting is sensitively sited and designed and is appropriate in terms of the proposed scale, mass, height, density, layout, and materials.
- Ensure that the form and structural integrity of the protected structure is retained.
- Protect and retain important elements of built heritage including historic gardens, stone walls, entrance gates and piers etc.
- Ensure historic landscapes, gardens, and trees (in good condition) associated with the protected structures are protected from inappropriate development.

5.10. South Dublin County Development Plan (SDCCDP) 2022-2028²

Numerous Protected Structures sites within SDCC incl. The Gothic Arch at Templeogue and Rathfarnham Castle also a National Monument in state ownership. I note Pearse Bridge is a designated National Monument (NM) as is Terenure College.

Rathfarnham Village including Willbrook is a designated ACA

Saint Patricks Cottages, Grange Road, Rathfarnham is a designated ACA

² SDCCDP 2022 – 2028 was adopted on 22/06/2022 and came into effect on 03/08/2022.

Chapter 7 Sustainable Movement: Policy SMI: ‘Promote ease of movement within, and access to South Dublin County, by integrating sustainable land-use planning with a high-quality sustainable transport and movement network for people and goods’.

- SMI Objective 1: ‘To achieve and monitor a transition to more sustainable travel modes including walking, cycling and public transport over the lifetime of the County Development Plan, in line with the County mode share targets of 15% Walk; 10% Cycle; 20% Bus; 5% Rail; and 50% Private (Car/Van/ HGV I Motorcycle)’.
- SMI Objective 3: ‘To support the delivery of key sustainable transport projects including DART and Luas expansion programmes, BusConnects and the Greater Dublin Metropolitan Cycle Network in accordance with RPO 5.2 of the RSES / MASP’.
- SMI Objective 4: ‘To ensure that future development is planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe and attractive street environment for pedestrians and cyclists, in accordance with RPO 5.3 of the RSES / MASP’.
- Policy SM2: Walking and Cycling ‘Re-balance movement priorities towards sustainable modes of travel by prioritising the development of walking and cycling facilities and encouraging a shift to active travel for people of all ages and abilities, in line with the County targets’. SM2 Objective 8: ‘To work with the NTA to acquire funding and secure full implementation of the Cycle South Dublin programme and actions which may arise from the sustainable movement studies carried out to inform the plan’.
- SM2 Objective 9: ‘To work with the NTA to review the feasibility of implementing additional cycling facilities within the major urban and recreational areas of the County’.
- Policy SM3: Public Transport ‘Promote a significant shift from car-based travel to public transport in line with County targets and facilitate the sustainable development of the County by supporting and guiding national agencies in delivering major improvements to the public transport network’.

- SM3 Objective 1: 'To achieve and monitor a transition to the County mode share targets of 20% Bus and 5% Rail'.
- SM3 Objective 3: 'To ensure that future development is planned in such a manner as to facilitate a significant shift to public transport use through pursuing compact growth policies, consolidating development around existing and planned public transport routes and interchanges, and maximising access to existing and planned public transport services throughout the network'.
- SM3 Objective 4: 'To optimise accessibility to public transport, increase catchment and maximise permeability through the creation of new and upgrading of existing walking and cycling routes linking to public transport stops'.
- Policy SM3: Public Transport - Bus
- SM3 Objective 11: 'To facilitate the delivery of the BusConnects Core Bus Corridors and seek additional bus corridor and orbital routes to serve the County by securing and maintaining any required route reservations and to ensure the BusConnects Corridors do not adversely affect the village life and livelihoods of any of our County Villages'.
- SM3 Objective 12: 'To work with the NTA to secure the expansion of the bus network, including distinct new bus networks as necessary, to serve new development and regeneration areas within the South Dublin County area including Tallaght, City Edge, Adamstown, Clonburris, Fortunestown, Ballycullen and Newcastle'.
- SM3 Objective 17: 'To work with the NTA and other state agencies to facilitate the delivery of the Kennelsfort Road-R148 grade separated junction or an equivalent solution to maximise the efficacy of the BusConnects Project'.
- SM3 Objective 18: 'To liaise with bus service providers where new bus stop infrastructure is proposed in order to ensure facilities such as shelters and bins are included, where appropriate'.

7.5.3 Design of Cycle Facilities

7.5.4 Active Travel and Schools

7.6.1 BusConnects

Route 12 Rathfarnham to city centre

Policy SM3: Public Transport – Bus

- SM3 Objective 11: ‘To facilitate the delivery of the BusConnects Core Bus Corridors and seek additional bus corridor and orbital routes to serve the County by securing and maintaining any required route reservations and to ensure the BusConnects Corridors do not adversely affect the village life and livelihoods of any of our County Villages’.
- SM3 Objective 12: ‘To work with the NTA to secure the expansion of the bus network, including distinct new bus networks as necessary, to serve new development and regeneration areas within the South Dublin County area including Tallaght, City Edge, Adamstown, Clonburris, Fortunestown, Ballycullen and Newcastle’.

Chapter 8 (Green Infrastructure) of the South Dublin County Council Development Plan 2016 contains a number of policies relating to the protection and preservation of existing trees, groups of trees, woodlands and hedgerows, as well as the incorporation of new green infrastructure elements within new developments.

5.11. Dún Laoghaire–Rathdown County Development Plan 2022 - 2028

The Proposed Scheme extends to the boundary with Dún Laoghaire–Rathdown County Council administrative area, where there will be changes to short section of Nutgrove Avenue.

The Proposed Scheme extends into an area of designated open space associated with Rathfarnham Wood residential estate. Which is within the administrative area of South Dublin County Council. The designated open space of Castle Golf Course which includes several tree protection objectives, is present nearby but outside the Proposed Scheme within the Dún Laoghaire–Rathdown County Council administrative area, beyond the residential open space and to the north of housing along Nutgrove Avenue. The temporary land acquisition at the junction of Rathfarnham Wood / Nutgrove Avenue / Grange Road is within the administrative area of South Dublin County Council as is the footpath and road margins along Nutgrove Avenue where it is proposed to tie in with the existing road infrastructure on Nutgrove Avenue where it enters Dun Laoghaire Rathdaown County Council.

5.12. Greater Dublin Area Transport Strategy – 2022-2042

This strategy replaces the previous GDA Transport Strategy 2016-2035. Busconnects is identified as a major project which is provided for within this strategy. The NTA has invested heavily in the renewal of the bus infrastructure, including bus stopping facilities, Real Time Passenger Information and fleet improvements and has commenced the largest ever investment programme in our bus network under BusConnects Dublin.

The Strategy recognises the government's commitment to sustainable mobility as outlined in NSO 4 of the National Development Plan 2021-2030.

Busconnects is identified as an essential to protecting access to Dublin Airport, ensuring that the Airport will operate in a sustainable fashion in terms of landside transport.

- Measure INT2 – International Gateways

It is the intention of the NTA, in conjunction with public transport operators, TII, and the local authorities, to serve the international gateways with the landside transport infrastructure and services which will facilitate their sustainable operation. Throughout the lifetime of the strategy, the NTA will continue to work with Dublin Port Company, other port and harbour operators and DAA in respect of Dublin Airport, in monitoring, assessing and delivering these transport requirements.

Major transport interchanges are recognised as an integral part of the bus connects project.

- Measure INT5 – Major Interchanges and Mobility Hubs

It is the intention of the NTA, in conjunction with TII, Irish Rail, local authorities, and landowners to deliver high quality major interchange facilities or Mobility Hubs at appropriate locations served by high capacity public transport services. These will be designed to be as seamless as possible and will incorporate a wide range of facilities as appropriate such as cycle parking, seating, shelter, kiosks selling refreshments plus the provision of travel information in printed and digital formats.

The NTA recognises that the construction of major projects including bus connects will cause disruption and it will seek to minimise such impacts through up-to-date travel information.

- Section 11.4 Cycle Infrastructure Provision and Management
- Section 12.2 Bus
- Measure BUS1 – Core Bus Corridor Programme

Subject to receipt of statutory consents, it is the intention of the NTA to implement the 12 Core Bus Corridors as set out in the BusConnects Dublin programme

- Measure BUS2 – Additional Radial Core Bus Corridors

It is the intention of the NTA to evaluate the need for, and deliver, additional priority on radial corridors.

- Measure BUS3 – Orbital and Local Bus Routes

It is the intention of the NTA to provide significant improvements to orbital and local bus services in the following ways: 1. Increased frequencies on the BusConnects orbital and local services; and 2. Providing bus priority measures at locations on the routes where delays to services are identified

- Section 12.2.4 Zero Emissions Buses

The transition to a zero emissions urban bus fleet for the State operated bus services has begun under BusConnects. Under the BusConnects Dublin programme, the full Dublin Area urban bus fleet will have transitioned to zero or low emission vehicles by 2030 and will have been converted to a full zero emission bus fleet by 2035.

- Measure BUS6 – Higher Capacity Bus Fleet

In the later phases of the Transport Strategy period, it is the intention of the NTA to introduce higher capacity bus vehicles onto select appropriate BusConnects corridors in order to increase passenger carrying capabilities in line with forecast demand.

- 12.2.8 New Bus Stops and Shelters

Bus shelter provision will be significantly expanded as part of the BusConnects Dublin programme and Connecting Ireland (section 12.2.7).

- 13.8 Road space Reallocation

In line with transport policies and objectives to reduce car dependency and to favour sustainable modes over the private car, and as a means of achieving reductions in carbon emissions, it is the intention to reallocate roadspace from its current use for general traffic to the exclusive use by walking, cycling and

public transport. This approach is applicable generally across the GDA, and in addition to the reallocation proposed under BusConnects.

- **Measure Road 13 – Roadspace Reallocation**

The local authorities and the NTA will implement a programme of roadspace reallocation from use by general traffic or as parking to exclusive use by sustainable modes as appropriate, as a means of achieving the following: y Providing sufficient capacity for sustainable modes; y Improving safety for pedestrians and cyclists; and y Encouraging mode shift from the private car and reducing emissions.

5.13. Dublin City Biodiversity Action Plan 2021-2025.

The Dublin City Biodiversity Action Plan 2021-2025 (DCC Biodiversity Plan) recognises that in addition to legally designated sites there are numerous habitats across the city that have conservation value for biodiversity, including public parks and open spaces, rivers, canals, and embankments. The DCC Biodiversity Plan sets out five themes supported by objectives and actions, these themes are set out below:

- Maintaining Nature in the City.
- Restoring Nature in the City.
- Building for Biodiversity.
- Understanding Biodiversity in the City
- Partnering for Biodiversity.

The objectives of the DCC Biodiversity Plan include:

- Objective 4 – Monitor and conserve legally-protected species within Dublin City, particularly those listed in the annexes of the EU Birds and Habitats Directive,
- Objective 11 – Ensure that measures for biodiversity and nature-based solutions are incorporated into new building projects, retrofit and maintenance works, and
- Objective 12 which promotes net biodiversity gain.

5.14. Legislative Context

5.15. Under Section 51(2) of the Roads Act, 1993 (as amended by Section 9(1)(e)(i) of the Roads Act, 2007), a road authority shall apply to the Board for the approval of a proposed road development and shall submit to the Board an Environmental Impact Assessment Report (EIAR) in respect of the development. The proposed road development shall not be carried out unless the Board has approved it or approved it with modifications. The Board shall ensure that it has, or have access as necessary to, sufficient expertise to examine the EIAR.

5.16. Before approval of the proposed road development, consideration must be given to the EIAR, any additional information, any submissions made in relation to the likely effects on the environment of the proposed road development, and the report and any recommendation of the person conducting any inquiry. Taking into account the preceding, the Board shall reach a reasoned conclusion on the significant effects of the proposed road development on the environment.

5.17. Heritage Designations and EIA

5.18. Natural Heritage Designations

5.19. The Proposed Scheme does not overlap with any European site. The following Special Areas of Conservation and Special Protection Areas are in the vicinity of the proposed development:

SAC's

- North Dublin Bay SAC,
- South Dublin Bay SAC,
- Rockabill to Dalkey Island SAC,
- Howth Head SAC,
- Wicklow Mountains SAC,
- Knocksink Wood SAC,
- Ballyman Glen SAC,
- Baldoyle Bay SAC,
- Glenasmole Valley SAC,
- Rye Water Valley / Carton SAC
- Irelands Eye SAC,
- Malahide Estuary SAC,
- Lambay Island SAC,

SPA's

- South Dublin Bay and River Tolka Estuary SPA,
- North Bull Island SPA,
- Dalkey Islands SPA,
- Wicklow Mountains SPA,
- Baldoyle Bay SPA,
- Howth Head Coast SPA,
- Ireland's Eye SPA,
- Malahide Estuary SPA,
- Rogerstown Estuary SPA,
- Lambay Island SPA
- The Murrough SPA
- Skerries Islands SPA and,
- Rockabill SPA,
- North West Irish Sea cSPA

A Natura Impact Statement (NIS) has been prepared with regard to the following European Sites and has been submitted to the Board in respect of the proposed road development under Part XAB of the Planning and Development Act 2000 (as amended). I have taken the information as provided within the applicants NIS and I consider Howth Head SAC in the interest of consistency, CO's and CI's should be screened in for further assessment therefore it is included within the following list:

- North Dublin Bay SAC,
- South Dublin Bay SAC,
- Howth Head SAC,
- Rockabill to Dalkey Island SAC,
- Lambay Island SAC,
- Wicklow Mountains SAC,
- South Dublin Bay and River Tolka Estuary SPA,
- North Bull Island SPA,
- Howth Head Coast SPA,
- Dalkey Islands SPA,
- Rockabill SPA,
- Baldoyle Bay SPA,
- Malahide Estuary SPA,
- Rogerstown Estuary SPA,
- Skerries Islands SPA,
- Ireland's Eye SPA,

- Lambay Island SPA,
- The Murrrough SPA and
- North west Irish Sea cSPA.

5.20. EIA Screening

5.21. The NTA has submitted to the Board the Environmental Impact Assessment Report (EIAR) prepared in accordance with section 50 of the Roads Act 1993 (as amended) and Directive 2011/92/EU of the European Parliament and Council, 2011 on the assessment of the effects of certain public and private projects on the environment as amended by Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014 in respect of the proposed road development.

6.0 Assessment

6.1. Introduction.

6.1.1. A substantial amount of information has been submitted to the Board in relation to this project throughout the application process. The planning assessment below has had regard to all the information provided, including the original application

documentation, all submissions and observations lodged by third parties (including prescribed bodies), the response to the submissions lodged by the applicant and subsequent further third-party submissions following circulation of that response.

6.1.2. I have read all the documentation on file including the EIAR, NIS, planning report and supporting documentation submitted with the application. I have visited the subject site and its surroundings. I have read in full the observations submitted in respect of the application including the third-party observations, the observations from the relevant Planning Authorities as well as the observations from prescribed bodies. Having regard to all the information that has been received, I consider that the key issues for consideration by the Board in this case are as follows:

- Policy Context/Principle,
- Justification and Need for the Proposed Scheme,
- Reliability of the Traffic Modelling, Data Counts and up to Date Nature of the Information,
- Adequacy of Consultation,
- Route Selection/Alternatives,
- Project/Junction Design,
- Bus Stops,
- Bus Gates,
- Rathgar Road,
- Provision for Cyclists,
- Removal of Parking / Loading Bays,
- Private Cars / Impact on commercial/Service / Community Premises,
- Built Heritage /Cultural Heritage/Architectural Heritage,
- Visual Impact/Townscape,
- Biodiversity,
- Residential Amenity,
- Other issues raised in submissions,
- Recommended Conditions.

6.2. Policy Context

National Level

- 6.2.1. The **Climate Action Plan, 2024 (CAP24)**, introduces carbon budgets and sectoral emissions ceilings for different sectors of the Irish economy. The Avoid-Shift-Improve Framework is outlined to achieve a net zero decarbonisation pathway for the transport sector, whereby actions are prioritised to *avoid* the need to travel; *shift* to more environmentally friendly modes; and to *improve* the energy efficiency of vehicle technology.
- 6.2.2. The proposed BusConnects programme includes road space reallocation, which is a measure outlined under both 'avoid' and 'shift' to promote active travel and modal shift to public transport. Road space reallocation can discourage car use, with valuable street space being redirected from on-street parking and public urban roadways to bus lanes, segregated cycle tracks, more spacious footpaths, and public realm improvements. BusConnects is also seen as a key action under the major public transport infrastructure programme to deliver abatement in transport emissions, as outlined in CAP24 for the period 2024-2025.
- 6.2.3. It should be noted, however, that BusConnects was designed under a previous Climate Action Plan and the Avoid-Shift-Improve Framework was new to CAP23 and has been applied again in CAP24. Whilst road space reallocation forms one of the main components of the Proposed Scheme, the assessment hereunder will, amongst other aspects of the assessment, seek to establish if such reallocation goes far enough to achieve a proper balance in the use of road space, in compliance with all levels of policy.
- 6.2.4. **The National Planning Framework** outlines a set of goals expressed as ten National Strategic Outcomes (NSO) to deliver shared benefits for communities across the country. Of most relevance to the proposed Templeogue / Rathfarnham to City Centre Core Bus Corridor is National Strategic Outcome - Sustainable Mobility, which recognises the need to move away from combustion engine driven transport systems. This will be achieved through the expansion of public transport alternatives to car transport, thereby reducing congestion and emissions, and catering for the demands associated with longer term population and employment growth.

- 6.2.5. The Proposed Scheme will also help to deliver other NSO's relating to compact growth and transition to a low carbon and climate resilient society. The Proposed Scheme can therefore be viewed as a wider integrated land use and transportation plan that sets out to fulfil the National Strategic Outcomes and National Policy Objectives of the NFP. Of particular relevance are, National Policy Objective 27, which aims to *“ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages”*; and National Planning Objective 54, which targets a *“reduction in carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions.”*
- 6.2.6. National Policy Objective 35 seeks to *“increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.”* As can be seen in the following section, this objective is being implemented along the core bus corridor through the large volume of higher density development. High density development and high-quality public transport accords with NPO64 through integrated land use and spatial planning that supports public transport, walking and cycling.
- 6.2.7. The **National Development Plan** makes provision for investment in public transport and sustainable mobility solutions, with BusConnects being recognised as one of the Major Regional Investments for the Eastern and Midlands Region. It is stated that BusConnects will overhaul the current bus system in Dublin, Cork, Galway, Limerick and Waterford by implementing ‘next generation’ bus corridors (including segregated cycle facilities). This will be enabled through **The National Investment Framework for Transport in Ireland**.

Regional Level

- 6.2.8. The **Eastern & Midlands Regional Spatial & Economic Strategy** (RSES) provides an investment framework and climate action strategy to support the implementation of Project Ireland 2040 (National Planning Framework and National Development Plan) at a regional level. The Strategy includes the Dublin Metropolitan Area Strategic Plan (MASP), which is an integrated land use and transportation strategy

that sets out guiding principles for the sustainable development of the Dublin Metropolitan Area. This plan seeks to focus growth along existing and proposed high quality public transport corridors in the interests of transport and land use integration and to support the delivery of BusConnects and other major transport programmes.

- 6.2.9. RSES also states that the future development in the Dublin Metropolitan Area shall be planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling), in addition to public transport use, and the creation of a safe attractive street environment for pedestrians and cyclists. This is reflected in the BusConnects programme whereby streets and public spaces are being redesigned to prioritise active transport modes and bus transport as alternatives to the car.
- 6.2.10. BusConnects forms a key part of the overall aim of the **Transport Strategy for the Greater Dublin Area, 2022-2042** to provide a sustainable, accessible and effective transport system for the Greater Dublin Area which meets the region's climate change requirements, serves the needs of urban and rural communities, and supports the regional economy. The proposed Templeogue / Rathfarnham to City Centre CBC scheme is one of 12 radial schemes being brought forward under this programme to facilitate faster and more reliable bus journeys on the busiest bus corridors in the Dublin region.
- 6.2.11. BusConnects accords with the specific measures outlined in the Strategy to incorporate a high standard of urban design and placemaking into major public transport infrastructure schemes and walking and cycling projects, taking account of architectural heritage (PLAN14 and PLAN15). The reallocation of road space to prioritise walking, cycling and public transport use and the placemaking functions of the urban street network (PLAN16) also form key considerations within the BusConnects network design.
- 6.2.12. The updated **Greater Dublin Area Cycle Network Plan** is published alongside the Transport Strategy. Cycle facilities proposed under BusConnects will contribute towards the intention of the NTA and local authorities to deliver a safe, comprehensive, attractive and legible cycle network in accordance with the updated Greater Dublin Area Cycle Network.
- 6.2.13. The 2013 Greater Dublin Area Cycle Network Plan included two primary cycle routes along the Proposed Scheme (Cycle Route 9A (TRE & Rathfarnham Road) and Cycle

Route 10 (Harcourt Street and Camden Street through Rathmines, Rathgar and Terenure to Rathfarnham, where it splits into several branches)) and intersection with a number of secondary cycle routes, including Cycle Route 8 (South Great George's Street via the Coombe area) and Cycle Route 9B (Tallaght along Clanbrassil Street and through Harold's Cross) and Secondary Route S04 of the GDA (from Dundrum, Churchtown and Nutgrove through Rathfarnham and Templeogue to Greenhills and Walkinstown).

- 6.2.14. The updated 2022 GDA Cycle Network Plan shows the CBC as a primary radial cycle route from Rathfarnham / Butterfield Avenue to city centre, from Harolds Cross to Terenure and from Spawell, Templeogue to Terenure (Cycle Route 9 and Cycle Route 10. A number of Secondary and Feeder routes intersect with the CBC at Rathfarnham, Rathgar, Harolds Cross, Rathmines and Grand Canal / Grove Road.
- 6.2.15. The Proposed Scheme will help to deliver the Cycle Network through installation of cycle tracks and safer junctions, many of which are located at intersections with other routes in the network e.g. the proposed scheme crosses and will tie in with the Dodder Greenway cycle route at Piers Bridge. In addition to the above, an alternative cycle route identified as a 'Feeder' Route in the 2022 GDA Cycle Network Plan – Dublin SE will be provided along Bushy Park Road, Wasdale Park, Wasdale Grove, Zion Road and Orwell Road.

Local Policy

- 6.2.16. The proposed CBC is located within Dublin City Council and South Dublin County Council administrative areas. The current operative plan for each local authority is the Dublin City Development Plan 2022-2028 and the South Dublin Development Plan 2022 - 2028
- 6.2.17. The Sustainable Movement and Transport chapter of **Dublin City Development Plan 2022-2028** highlights that the sustainable and efficient movement of people and goods is crucial for the success and vitality of the city, along with the need to move away from private car and fossil-fuel-based mobility to reduce the negative impacts of transport and climate change.
- 6.2.18. It is acknowledged that the impact of public transport infrastructure projects, such as BusConnects, on mode share is more likely to come into fruition during the lifespan of the following Development Plan. Notwithstanding this, Dublin City Council under

Policy SMT22 – Key Sustainable Transport Projects supports the delivery of an integrated public transport network serving existing and future needs of the city.

- 6.2.19. Improvements to the environment and public realm will be necessary to encourage walking, cycling and public transport use and the opportunities are recognised for developing public realm when new public transport proposals are being developed. This will be implemented through the BusConnects programme facilitating active travel and public transport improvements and associated public realm improvements.
- 6.2.20. The integration of active travel with public transport will comply with Policy SMT19 which seeks *“to work with the relevant transport providers, agencies and stakeholders to facilitate the integration of active travel (walking/cycling etc.) with public transport, ensuring ease of access for all.”* Dublin City Council has actively engaged with the NTA during the consultation process.
- 6.2.21. With respect to transport and sustainable movement under Policy SMT34 – Street and Road Design, Dublin City Council seeks *“to ensure that streets and roads within the city are designed to balance the needs and protect the safety of all road users and promote place making, sustainable movement and road safety providing a street environment that prioritises active travel and public transport whilst ensuring the needs of commercial servicing is accommodated.”*
- 6.2.22. There are two numbered relatively short stretches of the proposed scheme located within the South Dublin County Council local authority area.
- One section is from the existing spa well roundabout to the junction of Fortfield road, where the scheme enters the Dublin City Local Authority Area.
 - The second section in the South Dublin County Council area goes from Nutgrove Ave. to Dodder Park Road, again, where the proposed scheme goes into the Dublin City Local Authority Area.
- 6.2.23. **The South Dublin County Council Development Plan (SDCCDP) 2022 – 2028** is in favour of the principle of the proposed scheme with a supportive policy context, as is noted in their submission on the proposed scheme. Policy SMI within Chapter 7 ‘Sustainable Movement’ of the SDCCDP seeks to ‘Promote ease of movement within, and access to South Dublin County, by integrating sustainable land-use planning with a high-quality sustainable transport and movement network for people and goods’. **SMI Objective 1:** seeks ‘To achieve and monitor a transition to more

sustainable travel modes including walking, cycling and public transport over the lifetime of the County Development Plan, in line with the County mode share targets of 15% Walk; 10% Cycle; 20% Bus; 5% Rail; and 50% Private (Car/Van/ HGV I Motorcycle)'. It is notable that **SMI Objective 3**: seeks 'To support the delivery of key sustainable transport projects including DART and Luas expansion programmes, BusConnects and the Greater Dublin Metropolitan Cycle Network in accordance with RPO 5.2 of the RSES / MASP'. There are numerous policies and objectives to ensure that future development is planned in such a manner as to facilitate a significant shift to public transport use, and maximising access to existing and planned public transport services throughout the network. **SM3 Objective 4** seeks: 'To optimise accessibility to public transport, increase catchment and maximise permeability through the creation of new and upgrading of existing walking and cycling routes linking to public transport stops'. With respect to Route 12, Rathfarnham to city centre, Policy SM3: Public Transport – Bus and **SM3 Objective 11** seeks: 'To facilitate the delivery of the BusConnects Core Bus Corridors and seek additional bus corridor and orbital routes to serve the County by securing and maintaining any required route reservations and to ensure the BusConnects Corridors do not adversely affect the village life and livelihoods of any of our County Villages'.

- 6.2.24. The Proposed Scheme will provide the infrastructure to deliver a modal shift from private car usage to sustainable transport and will facilitate sustainable growth by delivering the transport infrastructure necessary to provide a high quality and more efficient and reliable public transport network.
- 6.2.25. Overall, the proposed BusConnects programme remains an integral and pivotal part of the requirement to tackle climate change and to enable a meaningful shift within the transport sector to active and sustainable transport modes. I would be satisfied that the proposed development is acceptable in principle and follows the consistent message within all levels of policy that there must be a transition to a low carbon and climate resilient society. This requires a reduction in car dependency to contribute towards lower energy consumption, CO₂ levels and pollutant emissions. Sustainable mobility, compact growth and land use and transportation integration are essential for the creation of sustainable communities that minimise private car use, prioritise cycling, walking and public transport and promote the efficient use of land. I am therefore satisfied that the proposed development is in accordance with the policy objectives set out in various plans and documentation referred to above.

6.3. Justification and Need for the Proposed Scheme,

- 6.3.1. The proposed development, as outlined above in section 3.0 of this report, is essentially an upgrade to the existing bus priority and cycle facilities along two main alignments, namely from Templeogue to Terenure (3.7km), and from Rathfarnham to the City Centre (6.3km). The route is split into four main sections:
- I. Tallaght Road to Rathfarnham Road,
 - II. Nutgrove Avenue to Terenure Road North – Grange Road, Rathfarnham Road;
 - III. Terenure Road North to Charleville Road – Terenure Road East, Rathgar Road; and
 - IV. Charleville Road to Dame Street.
- 6.3.2. The scheme includes a substantial increase in the level of bus priority provided along the corridor, including the provision of additional lengths of bus lane resulting in improved journey time reliability. Throughout the Proposed Scheme bus stops will be enhanced to improve the overall journey experience for bus passengers and cycle facilities will be substantially improved with segregated cycle tracks provided along the links and protected junctions with enhanced signalling for cyclists provided at junctions.
- 6.3.3. Where space for a segregated cycle track is not available on the main corridor, an alternative cycle route via quiet streets of approximately 2km along Harold's Cross Road / Terenure Road North between Terenure Cross and Parkview Avenue and 1.5km along Bushy Park Road, Wasdale Park, Wasdale Grove, Zion Road and Orwell Road is proposed.
- 6.3.4. Moreover, pedestrian facilities will be upgraded, and additional signalised crossings will be provided. In addition, urban realm works will be undertaken at key locations with higher quality materials, planting and street furniture provided to enhance the pedestrians experience, an example of this can be seen in Terenure, particularly at Terenure Cross.
- 6.3.5. This application is accompanied by a separate Compulsory Purchase Order ref: ABP-316377-22 in which it is sought to acquire various sections of lands along the route. The majority of lands to be acquired relate to the setting back of the front boundaries of residential properties. The main characteristics of the construction phase of the Proposed Scheme are as follows:

- Site preparation and clearance;
 - Removal of existing boundaries, pavements, lighting columns, bus stops, and signage;
 - Protection and / or diversion of buried services.
 - Road widening, pavement reconstruction, and kerb improvements.
 - Reconfiguration of traffic lanes throughout.
- 6.3.6. The proposed development is being developed in response to the need for a sustainable, reliable form of public transport along the route to and from the City Centre. Sustainable transport infrastructure is known to assist in creating more sustainable communities and healthier places to live and work while also stimulating economic development and also contributes to enhanced health and well-being when delivered effectively.
- 6.3.7. According to the National Planning Framework, 2018, the population of the Greater Dublin Area is forecast to increase by 25% by 2040 and this growth will have associated travel demands, placing added pressure on the transport system. Significant congestion already occurs throughout the GDA from private car dependence and intervention is therefore required to optimise road space and prioritise the movement of people over the movement of vehicles.
- 6.3.8. At present, the reliability and effectiveness of existing bus and cycle infrastructure on key radial traffic routes into and out of Dublin city centre is compromised by a lack of bus lanes and segregated cycle tracks. Furthermore, existing bus lanes are often shared with parking and cyclists and are not always operational on a 24 hour basis.
- 6.3.9. One of the overriding motivation for BusConnects is to reduce CO₂ emissions and this is critical from a global climatic perspective. The proposed scheme is specifically identified and supported within the Climate Action Plan 2024 and is seen as a key action under the major public transport infrastructure programme to deliver abatement in transport emissions. The scheme is also identified within the National Sustainable Mobility Policy document and the accompanying action plan as a key piece of infrastructure to be delivered to achieve reductions in emissions and provide for more efficient cities in terms of accessibility for all. The scheme is also seen as an economic driver within the cities which currently experience significant congestion and impediments to movement and accessibility.

- 6.3.10. At the local and shorter-term level, the issue of congestion is more obvious, and both congestion and CO₂ emissions are continuing to rise. Any further increases in traffic levels will see an exacerbation of congestion, CO₂ emissions and of all of the associated issues highlighted above. Private car dependence will worsen unless there is intervention to optimise road space and prioritise the movement of people over the movement of vehicles.
- 6.3.11. It is important to note that the Templeogue / Rathfarnham Corridor serves some of the busiest bus routes in Dublin. Congestion is already a common experience along this route, and without appropriate intervention the additional population and forecasted economic growth will increase traffic volumes and potentially lead to gridlock becoming a common feature along the route. Planning and transport policy all clearly point to the need to provide a better alternative to facilitate increased people movement along transport corridors to reduce emissions and congestion which adversely effects the population, economy and climate.
- 6.3.12. It is estimated that approximately 80% of road/ street space is dedicated to the car. A car travelling at 50kph requires 70 times more space than a pedestrian or cyclist. A double-deck bus takes up the equivalent spatial area of three cars but typically carries 50-100 times the number of passengers.
- 6.3.13. The proposed scheme is expected to see a 30% reduction in car use along the route and an increase in cycling and walking of 79%, in addition to a 123% increase in bus use. It has the potential to reduce greenhouse gas emissions in the transport sector, equivalent to the removal of approximately 15,590 and 11,470 car trips per weekday from the road network in 2028 and 2043. This has the effect of a reduction in total vehicle kilometres, a reduction in fuel usage, and increases to sustainable transport trips and modal share in accordance with the 2024 Climate Action Plan.
- 6.3.14. It has been demonstrated above that Templeogue / Rathfarnham to city centre BusConnects scheme is identified as a component of a Strategic Investment Priority which has been determined as central to the delivery of the National Planning Framework. The proposed scheme is also consistent will all levels national, regional and local policy relating to climate action and sustainable transport provision.
- 6.3.15. In terms of local transport need it is outlined by the applicant that bus priority infrastructure is currently provided along approximately 19% (outbound) and 45% (citybound), cumulatively equating to 32% of the length of the route. The Proposed

Scheme will facilitate 100% bus priority and complement the rollout of the Dublin Area Bus Network Redesign to deliver improved bus services on the route. This will improve journey times for bus, enhance its reliability and provide resilience to congestion.

- 6.3.16. Currently within the existing route there are segregated cycle tracks on approximately 18% and 13% of the route outbound and inbound respectively. Cycling facilities on the proposed scheme will increase to 100% overall, with 84% being fully segregated. The Proposed Scheme is implementing safe, segregated infrastructure throughout and as such is greatly enhancing the potential for cycling along the route.
- 6.3.17. The proposed scheme will also make significant improvements to pedestrian infrastructure through the provision of increased signal crossings, introduction of traffic calming measures, improved accessibility, increased pedestrian directness and wider footpaths and crossings. The number of pedestrian signal crossings will increase by approximately 39%. It is clear that the overall quality of pedestrian infrastructure will improve. This aligns with the overarching aim to provide enhanced walking infrastructure on the corridor. The improved walking and cycling measures that the scheme will provide will enhance the potential to grow these modes into the future.
- 6.3.18. The Proposed Scheme will address sustainable mode transport infrastructure constraints while contributing to an overall integrated sustainable transport system as proposed in the GDA Strategy 2022 - 2042. It will increase the effectiveness and attractiveness of bus services operating along the corridor and will result in more people benefiting from faster journey times and improved journey time reliability.
- 6.3.19. As highlighted above, the Rathfarnham-Terenure-Rathgar-Rathmines (The Proposed Scheme) serves some of the busiest bus routes in Dublin. Demand for travel by bus is anticipated to continue to grow in this corridor into the future, in line with population growth. I draw the Board's attention to the list of planning applications for residential / BTR / student accommodation / hotel accommodation / mixed use development, within the planning history section of this report above. The route is one of the busiest bus corridors in the Dublin Region and is forecast to accommodate further population growth.
- 6.3.20. The proposed scheme, therefore, will deliver the physical infrastructure necessary to sustain the projected population growth along and within the area of the route. It will

also provide a more accessible, safe, segregated, reliable, efficient, low carbon and climate resilient public transport service.

6.3.21. In overall conclusion, it is clear, that there is an obvious need and justification for the proposed scheme which has been clearly demonstrated from a population growth and congestion perspective and in the interests of land use and transport planning integration. It is also clear from the abundance of policy documents and plans at both an EU, national and local level that the proposed scheme is supported throughout all levels of government policy and therefore is justified and acceptable in principle.

6.4. Reliability of the traffic modelling, data counts and up to date nature of the information.

6.4.1. It is of note that concerns were raised in relation to a difference between the information provided during the development of the scheme, the time lapsed since data was collected and correlated, impact of the Covid – 19 pandemic on travel patterns, use of 2016 Census data and journey time information. I note that the scheme has been assessed in relation to the subject scheme proposed and does not take into account prior iterations of the scheme or journey time information, this I consider reasonable. I am satisfied that the proposed scheme will provide an improved service for public transport service along it.

6.4.2. According to the National Planning Framework, 2018, the population of the Greater Dublin Area is forecast to increase by 25% by 2040 and this growth will have associated travel demands, placing added pressure on the transport system. The EIAR compares the effects of do-nothing, do-minimum and do-something scenarios in future years. The do-nothing scenario represents the current traffic and transport conditions without the proposed scheme and other GDA Strategy projects in place. The do-minimum scenario for opening year (2028) and design year (2043) represents the likely conditions without the proposed scheme in place but allowing for all other GDA Strategy schemes to be implemented (other BusConnects elements, Dart+, Luas green line capacity enhancement, GDA Cycle Network Plan for 2028, and for 2043 assumes full implementation of GDA Strategy including MetroLink, Dart+ Tunnel, and Luas extensions to Lucan, Finglas and Bray). Finally, the do-something scenario represents the conditions with everything in place.

- 6.4.3. A people movement assessment was undertaken for the EIAR using outputs from the NTA Eastern Regional Model (ERM) and Local Area Model (LAM) and comparing the 'do minimum' and 'do something' peak hours for 2028 and 2043. Population growth has been derived by linear interpolation between 2016 Census data and the NPF 2040 population growth forecast. It is envisaged that the population will grow by 11% up to 2028 and by 25% by 2043. Employment growth is also forecasted to grow by 22% by 2028 and 49% by 2043, with an assumed growth in goods vehicle of 45% and 77% respectively up to the same years. I consider the use of 2016 Census data to be acceptable given the lead in time to the project and extensive analysis carried out. In consideration of this matter, I have also reviewed the October 2023 Central Statistics Office transport bulletin which shows that the number of bus journeys in Dublin have returned to (and more frequently exceed) the levels in 2019 (the last full year of pre-pandemic travel). Furthermore, I consider that with the population and economic growth anticipated, projected, and targeted over the short, medium, and long term, it is correct for the survey details to consider pre-pandemic levels of traffic and that levels of demand will increase in line with growth.
- 6.4.4. The NTA submit that from the information provided that the applicant has carried out a robust and detailed modelling of the entire route. This is demonstrated in the traffic modelling undertaken, the results of which are presented in Chapter 6 of the EIAR. It is noted that this modelling includes the movement of buses to and through the city centre. I also refer to the NTA's detailed response to this matter set out in section 4.10.8 of this report above. The NTA notes that the approach adopted in assessing and presenting the information is in line with TII's Traffic and Transport Assessment Guidelines (May 2014). This document is considered best practice guidance for the assessment of transport impacts, related to changes to traffic flow, due to proposed developments and is an appropriate means of assessing the impact of general traffic trip redistribution on the surrounding road network.
- 6.4.5. The modelling carried out shows a consistent increase in the travel demands associated with both a growing population and economy, and highlights the significant improvements throughout in the 'do something' scenario when compared to the 'do minimum'. Positive impacts are predicted in relation to pedestrian, cycling and bus infrastructure. Very significant positive and long-term impacts are predicted from the modelling in terms of bus network performance (journey times and bus reliability). It is noted that the modelled forecasts for the 2028 opening year indicate:

- A significant decrease in people travelling to/from the city by car in each peak period with decreases of 30% and 39% in the AM and PM peak periods respectively.
 - A significant increase in people travelling by public transport in each peak period with increases of 123% and 145% in the AM and PM peak periods respectively.
 - A significant increase in people walking/cycling in each peak period with increases of 79% and 91% in the AM and PM peak periods respectively.
- 6.4.6. The scheme will facilitate a step change in the level of segregated cycling provision in comparison with existing conditions along the entire length of the corridor. It is submitted that the transport modelling is conservative in terms of the predicted cycling mode share. The scheme has been designed to cater for much higher levels of cycling uptake than modelled outputs, to cater for long-term trends in travel behaviours as people make sustainable travel lifestyle choices, which would otherwise not be achievable in the absence of the proposed scheme.
- 6.4.7. A micro-simulation model assessment has been developed and network performance indicators established for bus operations along the route. As previously highlighted, the results of the assessment demonstrate that the total bus journey times on all modelled bus services will improve by between 8% and 12% during the AM and PM Peak hours of the 2028 Opening Year and 2043 Design Year. Based on the AM and PM peak hours alone, 7.4 hours of savings in 2028 and 6.2 hours in 2043, when compared to the Do Minimum combined across all buses.
- 6.4.8. Overall, it is anticipated that the improvements to the network performance indicators for bus users along the route will have a Positive, Very Significant and Long-term effect. These are significant improvements that will reduce the amount of congestion along this existing transport corridor and provide a mechanism whereby the predicted population and economic growth for Dublin can be sustainably managed in terms of traffic and transport demands.
- 6.4.9. I consider the modelling carried out is robust, based on accurate data and reaches reasonable conclusions. I am therefore satisfied that the applicants have utilised a detailed, robust and multi-faceted modelling approach to develop the proposed scheme. I consider that the short term changes to travel patterns caused by the Covid-19 pandemic does not impact on the objectives of the scheme to reduce car

dependency in the Greater Dublin Area and remains particularly relevant in light of anticipated population growth into the future.

6.5. Adequacy of Consultation

- 6.5.1. It is important to consider the adequacy of the consultation undertaken by the NTA in relation to the proposed development. I note that a number of concerns are raised within the third-party submissions received in relation to the type and frequency of consultation carried out. Concerns are raised in relation to the timing of the consultation given that it occurred during the COVID pandemic and associated lock downs. There are concerns that the public were not made fully aware of the details of the proposed scheme and were prohibited from engaging with the NTA in relation to the design process. Further concerns are raised in relation to the virtual format utilised by the NTA to undertake consultations as a result of the pandemic and some believe that many people were unable to access the online forum and therefore did not have an opportunity to consider or make representations to the scheme.
- 6.5.2. Reference is also made within a number of submissions to compliance with the Aarhus convention and the Kazakhstan Advice.
- 6.5.3. I refer the Board to the NTA's response to concerns raised in relation to the consultation process above and consider it important to reiterate at this juncture the key points that have been made. It is stated by the applicant that three rounds of consultation were undertaken with a number of methods used including, a dedicated website, brochures social media coverage, advertising and public information events, whereby the first 2 sessions were held in person and the 3rd virtually due to COVID restrictions. Details of the public meeting events are outlined within the NTA's response summarised above within the third-party section of my report. I refer the Board to this section for details of same. I note that the final round of non-statutory consultation was open for 6 weeks and whilst virtual, a call back facility was added.
- 6.5.4. In relation to the statutory process, I note the applicant erected 39 site notices along the proposed route, advertised the scheme within the relevant newspapers as required and engaged with third parties who have engaged with the process through their submissions to the Board. As set out above under NTA response to third party submissions, 'Site Notices' (paragraph 4.10.99), the NTA notes the comment in relation to the incorrect date which was noted on the original site notices. Upon

realising this error, the NTA liaised directly with An Bord Pleanála and the public consultation period was extended beyond the original deadline of 20 June 2023 to 15 August 2023 in order to ensure full and effective public participation as outlined in the further notice which was published in a national and a local newspaper on 8 June 2023. In addition to the newspaper notice, the owners, lessees and occupiers were notified of this extended deadline by letters dated 13 June 2023 and new site notices, referencing this extended public consultation period, were erected in all 39 locations in place of the original site notices on 8 June 2023. I am therefore satisfied that the applicant has complied with the requirements of the Aarhus Convention in its relevance to the statutory process and note that such requirements are not relative to any non-statutory consultation which is carried out at the discretion of the applicant.

- 6.5.5. It is of further note that the Kazakhstan Advice is also not relevant to any non-statutory public consultation and relates to the holding of public hearings in relation to the statutory process. Such hearings provided for under the Planning and Development Act 2000, as amended are a discretionary function of the Board.
- 6.5.6. Throughout the CBC Infrastructure Works, it is clear, residents' groups have been engaged with. Members of the BusConnects Infrastructure team had Zoom meetings with representatives of the Rathfarnham Road Residents Association, Terenure Residents Association, Rathfarnham Road Group (South of Dodder), Templeogue Road Residents Group, Castlewood Avenue Residents (Rathmines), Rathfarnham Mill, Woodview Cottages & Owendore Residents and a number of other groups along Templeogue Road throughout 2020 and 2021 to discuss the proposals on the Templeogue/Rathfarnham to City Centre Core Bus Corridor scheme.
- 6.5.7. It is also clear that the residents and the wider community along the route have been made fully aware of the scheme details and as a result have participated actively in the application process through the 280 plus submissions received by the Board which is welcomed.
- 6.5.8. Concerns have also been raised in relation to the level of clarity provided within the documents in relation to the description of the proposed works. I have reviewed the documentation, plans and particulars submitted with the application in detail and note that the documents provided leave no ambiguity to the specifics of the proposed scheme extents in terms of its route, design, implementation and all mitigation measures proposed.

6.5.9. Thus, having regard to the documentation submitted in terms of public notices, advertisement and details of non-statutory consultations and engagement with third parties, I am satisfied that the applicant has clearly engaged with the community and all third parties and has amended the scheme accordingly where it has been feasible to do so in response to the concerns raised.

6.6. Route Alternatives Considered

6.6.1. The consideration of alternatives is documented within Section 3 of the EIAR submitted. I note that alternatives were considered at three levels, strategic alternatives, route alternatives and design alternatives.

6.6.2. The strategic alternatives considered are Bus Rapid Transit (BRT), light rail, metro, heavy rail, demand management and technological alternatives. As referred to above, in the preceding section of this report, the appropriate type of public transport provision in any particular case is predominately determined by the likely quantum of passenger demand along the particular public transport route. With this in mind the applicant considered the option of constructing a light rail service which would cater for a passenger demand of between 3,500 and 7,000 per hour per direction (inbound and outbound journeys). Based on the number of passengers predicted to use the new service, it was considered that there would be insufficient demand to justify a light rail option. The light rail option would also require significantly more land take, necessitating the demolition of properties.

6.6.3. Metro alternative was also considered and as there is a higher capacity requirement for such solutions it was not suitable for this route. In addition, the development of an underground metro would not remove the need for additional infrastructure to serve the residual bus needs of the area covered by the Proposed Scheme. Heavy rail alternatives carry in excess of 10,000 people each direction each hour and was considered an unsuitable solution.

6.6.4. Demand management in the form of restricting car movement or car access through regulatory signage and access prohibitions, to parking restrictions and fiscal measures (such as tolls, road pricing, congestion charging, fuel/vehicle surcharges and similar) were all considered as alternatives to the proposed scheme. However, it is stated that in the case of Dublin, the existing public transport system does not currently have sufficient capacity to cater for large volumes of additional users, such

measures would not work in isolation to address car journeys into and out of the city and would not encourage people onto alternative modes.

- 6.6.5. Whilst technological alternatives are becoming increasingly advanced, the use of electric vehicles does not address congestion problems and the need for mass transit. The reasonable conclusion is reached that enhanced bus priority and cycle facilities, together with a rail upgrade involving limited construction works are best placed to serve the corridor having regard economic and environmental factors and passenger numbers that each mode would carry.
- 6.6.6. The route selection stage examined the road network along the corridor using a “spiders web” approach to select the most desirable roads for the corridor. Design alternatives were examined during the different phases of public consultation where certain details, such as space constraints, lack of appropriate adjacent linkages to form a coherent end-to-end route, unsuitability of particular routes, the need for significant land take from residential properties and related construction GHG impacts.
- 6.6.7. It is noteworthy that the Proposed Scheme was designed a number of years ago and events relating to climate change have become more prominent and urgent. Moreover, CAP24 reaffirms sectoral emissions ceilings that were introduced in CAP23 and together with the Avoid-Shift-Improve framework seek to achieve a net zero decarbonisation pathway for transport. Road space reallocation is a measure under both ‘avoid’ and ‘shift’ to promote active travel and modal shift to public transport. CAP24 recognises that road space reallocation can redirect valuable space from on-street car parking and public urban roadways to public transport and active travel infrastructure (such as efficient bus lanes, and more spacious footpaths and segregated cycle-lanes), whilst also leading to significant and wide-scale improvements in our urban environments.
- 6.6.8. I note that a number of submissions are concerned with the lack of alternatives considered by the applicant. In particular, concern of exclusion of the N81 and R137 Harold’s Cross Road from consideration, study, assessment and comparison of environmental effects with the chosen route. Indeed, the submission by Diarmuid McGuinness (Rathgar Senior Council), see summary of submission 84 in Appendix 1 for detail, considered that justification for not considering the alternative route at Harold’s Cross has erred in law. I consider that my assessment is confined to the

proposed route / scheme as submitted. I believe that the concern that alternatives have not been robustly considered is not substantiated. In the context of the information provided by the applicant I am satisfied that the applicant has carried out an extensive, detailed and robust assessment of all reasonable options for the proposed scheme. I draw the Board's attention to Chapter 3 of the EIAR in which the applicant comprehensively details all alternative considered and the detailed assessment and consideration of alternative routes and the emergence of the preferred route.

6.6.9. In addition to issues raised with respect to alternatives considered, the following specific concerns have been raised by third parties with respect to route design and have been fully considered within my assessment.

- Concern road widening onto the western side of Grange Road was not considered as an alternative to impact upon Rathfarnham Castle Park.
- A yellow grid box would be required, at Grove Road / Grove Park Junction, to facilitate vehicles turning right.
- Request a turning circle at the junction of Lower Mountpleasant Avenue and Canal Road to facilitate turning onto Rathmines Road Lower.
- Concern of proposed bollards on Lower Mountpleasant Avenue.
- Bollards proposed at Mountpleasant Avenue Lower be automatic to allow for emergency services.
- Concern of vehicles mounting footpaths due to the road's dimensions at Mountpleasant Avenue Upper.
- Request that the reintroduction of two-way traffic on Mountpleasant Avenue Upper is rejected.
- Concern of location of 'bus gate' immediately adjacent to the entrance to Lissenfield. Concern of impact on access at Lissenfield.
- Concern of prohibition on right turning movements, except for public service vehicles and cyclists, from the entrance to Lissenfield onto Rathmines Road Lower between 6.00 am and 20.00 (Monday – Sunday)

- Concern of the bus gate on lower Rathmines Road – impact upon Grove Park will see increased traffic. Suggest that the bus gate hours are open to car traffic Mon – Fri from 10 am to 4 pm in both directions North South.
- Concern of dishing of cycle lane curbing at the entrances of houses on Lower Rathmines Road on the east side.
- Request that the return of the left turn from Rathmines Road Lower onto Castlewood Avenue be considered.
- Local access to and from Rathmines Road could be enhanced by having a right turn onto Rathmines Road from Castlewood Road and a left-turn from Rathmines Road onto Castlewood.
- New Right turn at Terenure Cross from Rathfarnham Road towards Rathgar via Terenure Road East needs to be reconsidered.
- A right turn ban into Rathdown Avenue should not apply post morning peak, so locals can access the Park.
- Concern of proposed right turn ban from TRW into Rathdown Crescent.
- Request that the proposed cycle access into Rathdown Drive be removed. Concern of cyclist safety on Rathdown Drive given narrow restricted width of the street.
- Concern of impact of 24 hour bus gate on Templeogue Road near Olney Crescent.
- Concern of proposed right turn into Terenure Road East for public transport only.
- The proposed ‘no right turn’ from Cullenswood Road onto Ranelagh Road should be carefully evaluated as this restriction will result in considerable detours.
- Concern of one-way inbound system on Rathgar Road and impact upon Highfield Road and Upper Rathmines Road.
- The plan to turn Rathgar Road into a one-way system is draconian and unnecessary.
- Concern of change to signalised junction at Spawell Roundabout

- Concern of numerous right turn bans
- Pedestrian crossing should be provided on the eastern arm of the junction at Rathfarnham Park / Rathfarnham Road Junction.
- Camden Street Junction and Charlotte Way Junction should be adjusted to a traditional T-junction.
- Concern of no right turn ban at junction of Fortfield Road and Templeogue Road.
- Support the proposed closure of the junction from Richmond Hill to Mountpleasant Avenue Lower.
- There is a need to complete a walking and cycling assessment for each junction along the scheme, to adequately assess time for walking and cycling.
- Concern with respect to access to villages and supermarkets, shopping centres, disparity between routes, access to PO in Templeogue Village, St. Pius X Church, increased volume of traffic at junction of Fortfield Road with Wainsfort Road and the estate called The Orchard.
- Concern of volume of traffic on TRW and access to schools.
- Concern of inadequate public transport service for Harolds Cross Road.
- Concern of failure to consider Harolds Cross Road in the context of Busconnects route option.
- Request that a yellow box is provided at the entrance to Ashfield Place and possible provision of gated access.

6.6.10. I note submissions to the CPO by Denise Russell (44 Templeogue Road), Maureen Egan (Glendale 311 Templeogue Road) Plot List 1113(1).1d, Daniel and Jackie Durkan (Burnsely, 315 Templeogue Road), Mr Andrew Fahy and Mrs Denise (Boyle) Fahy (Cranford House, 325 Templeogue Road), Ashfield Place Owners Management CLG, Celine and John Cullen (14 Fortrose Park), Paul Dormer (15 Fortrose Park) Plot List 1108(1).1d & Plot List 1108(2).2d. The submissions raise concerns with respect to land acquisition, loss of garden amenity space, especially in relation to removal of trees, green area, and children's playground outside Ashfield Development. Need for a bus gate, hours of operation, impact on Fortfield Road /

Greenlea Road / Laverna Road, impact upon access to Rathdown, effectiveness of proposed turn bans.

6.6.11. The issues raised common to multiple observers have been dealt with in the CPO report 316377-23 which accompanies this report. I note the issue with respect to access and temporary and permanent CPO of lands at Ashfield Place, Easton Hall (TRN) and Earls Court (No. 80 TRE). The NTA submit that there is currently no yellow box provided at the entrance to Ashfield Place or Earl Court. A bus priority signal is proposed near to Ashfield Place, a toucan crossing is located nearby Earl Court it is not considered necessary to include a yellow box at such locations. However, should an issue with access be identified in future, a yellow box may be considered appropriate and could be installed by the local authority. It is noted that the proposed scheme would not preclude this being introduced. I consider this response acceptable. Regard is had to the submission relating to lands to be acquired at Terenure Road North (TRN) Plot List 1056(1).1e; 1056(2).2e. Concern is expressed by Eaton Hall Owners 'Management Company with respect to access for residents of Eaton Hall. Request that an undertaking be given to ensure continued access to the parking area for residents. I note that the proposed scheme does not propose to permanently restrict vehicular access/egress to/from the grounds of Eaton Hall. I also note it would not be appropriate to include gated access to Ashfield Place as a consequence of this scheme. Concern over alteration to the playground and amenity space is noted as is the location of an attenuation tank under the playground. The NTA have indicated that it is proposed to replace the boundary with Ashfield Place on a like for like basis. The temporary acquisition, required to facilitate the construction of the proposed raised crossing, will result in a temporary restriction on private rights at this location and at Eaton Hall, when construction works are in progress at the entrances. Upon completion of the works, the temporary land take area will be handed back to the property owners. It is noted the temporary acquisition will not be required for the full duration of the works.

6.6.12. In addition to the above, I note, there are many submissions in support of and welcome the design interventions. I highlight, in particular, the submissions by Dublin City Council and South Dublin County Council. I also highlight the submission by Dublin Cycling Campaign which welcomes the introduction of a Bus gate in Rathmines and segregated cycle tracks through Rathmines Village, removal of Owendoher and Brookvale elements of the previous routes proposed in CBC 12,

round 3 and instead introducing cycling facilities along the main CBC corridor. Improved Island Bus-stops along the scheme, which provide greater protection for bus passengers and greater safety for cyclists. Welcome the conversion of Spawell roundabout to a signalised junction, and on the R137 at J1000, the locating of the footpath to the back of the stone arch and the cycle track to the front of it. The introduction of cycle facilities on Terenure Road North and Harold's Cross Road. This submission is endorsed by Ciaran Ahern of the Labour Party who submits that behavioural change is required and necessary, welcomes the health benefits associated with active travel, does not agree traffic is displaced; rather it is removed. I also note the submission by the Dublin Commuter Coalition in support of the proposed project, in fact, it believes the proposals do not go far enough and 24/7 bus lanes and bus gates should be rolled out. I highlight calls by many submissions that a 30 Kph speed limit restriction for cars and e-bikes be introduced. I refer the Board to Submission No. 88 of Appendix 1 which I note requests redesign of junctions and raises safety of bus stop design. I highlight support by Filipa Allen Egan to the proposed closure of the junction from Richmond Hill to Mountpleasant Avenue Lower. Gavan Maguire submits that it is critically important that the right-hand turn ban onto Greenfield Road from Fortfield Road is agreed and enforced. Ivana Bacik TD supports the proposed project and welcomes the implementation of a bus corridor on Rathmines Road for the benefit of all. In particular, her submission asserts that the implementation of segregated cycle lanes along the route will lead to a significant improvement to cyclist safety and should encourage more people to use bicycles on a regular basis. Any changes to routes along Rathmines must also ensure continued safe access for those with impaired mobility to all the amenities and public buildings along this busy route, like medical services, shops and restaurants, cinemas and leisure amenities, Swan Leisure, the Swan Centre, Rathmines church and other venues. I highlight her concerns in respect of impact upon residents of Fortfield Road, Terenure Road West and adjoining roads due to new turning restrictions, it is suggested that the provision of 'local access' arrangements would be very helpful to address this issue. I note the submission of support by Joan Kelly Mountpleasant Avenue to the proposed right-hand turn ban from Leinster Road onto Rathmines Road Lower and also the support the introduction of bollards at Corrigan's Pub on Mountpleasant Avenue Lower. The Residents of Mountpleasant Area also broadly support the project and welcome the filtered permeability proposal on Mountpleasant Avenue Lower. They also request

that the proposed re-introduction of a vehicular right-turn from Richmond Hill into Mountpleasant Avenue Upper is not implemented, on traffic safety grounds. I note and agree with John Lahart (TD) that the project is needed to address chronic traffic congestion and I highlight his comments, that many younger people have expressed support for the project but note that few young people attended the public meetings. I highlight the positive and welcoming submission by Muireann O’Dea, Frank Cronin and Oran Doyle (Terenure) with respect to increased segregated cycle facilities. The provision of (almost) continuous segregated cycle tracks from Rathfarnham through Terenure to Harolds Cross. The segregated cycle tracks from Rathgar and Rathmines to the city centre. The segregated cycle tracks from the Tallaght M50 junction to Templeogue, and from Templeogue Village to Rathdown Avenue. The bus gate at Olney Grove to provide bus priority through Terenure Village and the bus gate in Rathmines and segregated cycle tracks through Rathmines Village.

6.6.13. Section 3, of this report, above, has set out a detailed description of the overall project, including an overview of junction, bus stop, signage, infrastructure, and overall route design by section. A summary of the proposed changes as a result of the proposed scheme is set out in Table 4.1 section 4.2 chapter 4 ‘Proposed Scheme Description’. The proposed scheme provides for 32 junction upgrades and associated ancillary works. Several submissions have been lodged in relation to specific infrastructure design elements within the scheme (as set out above).

6.6.14. The Proposed Scheme will interface with the following under construction or proposed developments and as such the design has accounted for appropriate tie in with the following schemes.

- Grange Road Walking and Cycling Scheme
 - This scheme, which was completed in 2022, involved the provision of walking and cycling facilities on Grange Road between St. Enda’s Drive and Nutgrove Avenue.
- Wellington Lane Walking and Cycling Scheme
 - This scheme involves the provision of walking and cycling facilities on Wellington Lane between Spawell Roundabout and Kimmage Road West. The Proposed Scheme has been coordinated with the proposals.
- Dodder Greenway Scheme

- This scheme involves the provision of cycle facilities adjacent to Dodder Park Road as well as the provision of cycle facilities on Spawell Road.
- Templeogue Village Initiative Scheme
 - This scheme, which was completed in 2022, involved upgrade and enhancement of the public realm within Templeogue Village by SDCC. The Proposed Scheme integrates with this scheme at either end of Templeogue Village.

6.6.15. As part of the Preliminary Design of the Proposed Scheme, consideration has been given to the potential coordination required in relation to other schemes within the BusConnects CBC Infrastructure Works. The section outlines potential interactions of the Proposed Scheme with adjacent scheme(s) and identifies any procedures within the construction strategies that may be required in order to account for various sequencing scenarios in the construction of the schemes. The closest such scheme to the Proposed Scheme is the Kimmage to City Centre CBC Scheme, with which the Proposed Scheme interacts at the signalised junction of Harold's Cross Road / Rathgar Avenue / Kenilworth Square / Kenilworth Park and the junction of Harold's Cross Road and Parkview Avenue.

6.6.16. The PRO Report explains the rationale for the options on Rathfarnham Road south of the Dodder. The Rathfarnham to City Centre Core Bus Corridor CBC Feasibility Study and Options Assessment Report, determined that the route should stop at the junction of Nutgrove Avenue and Grange Road, as south of this point generally there are three principal routes between Marley Park and the Dodder crossing namely via Stone Mason's Way, Grange Road and Ballyboden Road which currently carry less frequent bus services and which converge at Nutgrove Avenue in the vicinity of the junction with Grange Road. In addition, the A2, A4 and S6 Bus services split at the Nutgrove junction which further supports the rationale to extend the scheme as far as Nutgrove junction. In addition to the MCA's, a number of minor changes to the design were made based on feedback received during public consultation and dialogue with stakeholders.

6.6.17. I consider that the justification for the chosen route is well reasoned and rational. It is my opinion the chosen route is well considered and reasonable on the basis of the feasibility and options report, and Multi-Criteria Analysis (MCA) which evaluated the

route options under the assessment criteria of economy, integration, accessibility and social inclusion, safety and environment. In particular, with respect to environment, the chosen route has regard to archaeology, architectural and cultural heritage, hydrology, potential to impact on the townscape / streetscape as well as the landscape and visual impact, air quality, noise and vibration. From my assessment of the information on file I conclude that the chosen route has benefits over other options in relation to Capital Cost, Transport Quality and Reliability, Cycle Network Integration, Key Trip Attractors, Road Safety, Pedestrians Safety, Flora and Fauna and Landscape and Visual.

6.6.18. I note that both Traffic Division of SDCC and the Traffic Division of DCC are 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 transport service. I note the DCC submission states: 'The corridor cannot be operated in isolation and must in fact be a managed corridor such that DCC traffic control systems is constantly managing requests for priority and has the necessary information to determine what level of priority is appropriate in order to maintain an even headway on the corridor.' The report goes on to state: 'The corridor needs to be considered as a whole and that the various different measures to prioritize public transport, walking and cycling need to be implemented in as full amount or as possible to avoid 'watering down' the benefits of this scheme by making localised changes to the design.' It is evident from the DCC submission that modelling works were carried out on the corridor to mimic the real-life operation of a full corridor management system using an adaptive traffic control system and allows for a firm basis for how the corridor can be evaluated and to determine benefits. In the future it will be within the remit of the individual local authority to review various alternative solutions as suggested by residents and numerous submissions with respect to yellow boxes, turn bans, bollards, build outs, signage, enforcement etc. It is noted that the proposed scheme would not preclude such measures or amendments from being introduced at a later date, if deemed appropriate.

6.6.19. Based on the analysis submitted I am of the opinion that the Core Bus Corridor Infrastructure Works achieves the project objectives in supporting the delivery of an efficient, low carbon and climate resilient public transport service, which supports the achievement of Ireland's emission reduction targets. The Core Bus Corridor Infrastructure Works has the potential to reduce GHG emissions equivalent to the

removal of approximately 105,500 and 209,100 car trips per weekday from the road network in 2028 and 2043 respectively. This has the effect of a reduction in total vehicle kilometres, a reduction in fuel usage, and increases to sustainable transport trips and modal share in accordance with the 2024 Climate Action Plan. It is concluded that, cumulatively, the Core Bus Corridor Infrastructure Works will make a significant contribution to carbon reduction.

- 6.6.20. I am satisfied based on the information submitted that the proposed route both in isolation and in combination with the other 11 Core Bus Corridor Schemes, will meet its required objectives (maximising people movement capacity across the city) and that the environmental impacts and level of residual impacts will be reduced to a minimum. I am also satisfied that the cumulative and in combination impacts have been robustly assessed in the documents submitted, that the route alternatives considered are robust and sufficient to reach reasonable and logical balanced conclusions.
- 6.6.21. Busconnects is the most likely new public transport plan to be achieved this decade. This plan will improve travel times, air quality and safety right across the proposed scheme catchment and the entire city. It will provide a faster and more efficient bus service for everyone in addition to delivering improved cycling and pedestrian facilities.

6.7. Project/Junction Design

- 6.7.1. A summary of the overall junction design approach adopted has been set out in section 3.1 previously above, in general the approach is to limit left turning filter lanes and provide segregated, delineated, and controlled crossings for cyclists and pedestrians. Some submissions have raised concerns that the Proposed Scheme does not go far enough to protect cyclists and that alternatives such as “Dutch-style” and “Cyclops” junction designs at junctions should be provided. In simple terms due to the established urban environment through which the Proposed Scheme runs, the space is not available within the existing corridor to cater for such interventions without significant impacts at each of the junctions and that to provide such solutions would give rise to significant adverse impacts on population, landholdings, as well as the built and natural environment, however, I note that the junctions proposed within

the scheme provide protection for pedestrians and cyclists and have been informed by international best practice.

- 6.7.2. The Proposed Scheme provides for a bespoke junction design at each of the junction locations within the existing constraints arising from this urban environment while also adhering to a set of general principles to improve safety and movements for all users – buses, cyclists, pedestrians, and general traffic. The junction typologies within the Proposed Scheme are either type 1 / type 3 junctions with one type 4 junction as described in the BusConnects Preliminary Design Booklet, with each specific junction described in the Junction Design Report (Appendix L Junction Design Report of the EIAR). The junction designs have also been fully informed through consideration of the needs of disability groups and catering for pedestrians who are the most vulnerable users. Note: A full Junction Type 2 has not been applied to the Proposed Scheme, however the Proposed Scheme has a number of ‘hybrid’ junctions, which comprise of a Junction Type 2 and another junction type,
- 6.7.3. The junction designs throughout the Proposed Scheme have been informed by the Design Manual for Urban Roads (DMURS), in particular with regard to the hierarchy of users (with pedestrians being afforded the highest priority, then cyclists then public transport with private vehicles at the bottom of the user hierarchy) and the requirements of providing safe crossing points for pedestrians and cyclists while facilitating traffic movements. All junctions provide for protected cyclist loitering areas and generally provide for delineated segregated crossing points dedicated to cyclists with separate pedestrian crossing points generally in place. In some instances, toucan crossings are provided (where carriageway crossing facilities are shared between pedestrians and cyclists). Some third-party submissions, incl. Dublin Commuter Coalition and submission by John Shanahan (Templeogue), question the merit and safety of this approach and request that dedicated and separate cyclist facilities be provided at all crossing points. Toucan crossings are provided at locations such as Harold's Cross Rd / Leinster Rd. Junction, Terenure Rd E / Rathgar Rd Junction type 1, Rathgar Rd / Highfield Rd Junction Type 1. Toucan crossings are proposed to facilitate mid-stream crossings (between junctions) and to accommodate crossings where a junction cannot accommodate separate dedicated cyclist and pedestrian crossing infrastructure. Some submissions state that toucan crossings do not provide the highest level of service for cyclists and there is a potential conflict between cyclist and pedestrian users. I note these concerns,

however, I am satisfied that the use of toucan crossings at the select locations indicated is appropriate, relevant and all suitable measures have been included to ensure safety of users.

- 6.7.4. Overall, toucan crossings within the scheme are only specified at certain specific locations where alternative crossing arrangements are either not suitable or appropriate. I consider that the level of service being provided to pedestrians and cyclists using these crossings constitutes an improvement from the existing situations in place along the route and that all measures and crossings represent a safe and sustainable means of crossing roads for all.
- 6.7.5. The proposed junction designs incorporated throughout the Proposed Scheme generally provide for deflection of the cycle track at junctions to provide a protection kerb/buffer between cyclists and vehicular traffic. The radius and design of the kerbing requires vehicles to carry out a tighter turning manoeuvre to complete a left turn which effectively will force them to slow down prior to and during the turn. This junction arrangement is provided both at the larger signalised controlled junctions as well as on smaller (non-signalised) side junctions where an additional raised table treatment is incorporated to further reduce traffic speeds and highlight the potential presence of pedestrians and cyclists to left turning vehicles. At signalised junctions the design layout also keeps straight-ahead and right-turning cyclists on the raised-adjacent cycle track as far as the junction, avoiding any cyclist-vehicle conflict which may arise from cyclists weaving and merging lanes on the approach to junctions. The design of the protection kerbing incorporated at junctions also restricts cyclists from crossing over to the centre of a junction to turn right and thus they will be directed to cross via the designated crossing points thus improving their safety at such locations.
- 6.7.6. Signalling is also used to improve safety where possible, so that staggered signalling will be used to highlight and assert the presence of cyclists where left turning vehicles may proceed at the same time (this is particularly important in situations where left turning traffic will be coming from a more central lane and crossing a bus lane). The Board should also note that the Proposed Scheme incorporates new signalling which will highlight the necessity for left turning vehicles to proceed with caution, be aware of, and yield to, cyclists and pedestrians proceeding straight.
- 6.7.7. In relation to pedestrian crossings I am satisfied that the proposals have been designed to ensure pedestrian safety at all junctions. The Proposed Scheme

provides additional controlled pedestrian crossings along the route (increasing from 76 to 106 – 39% increase) and all are designed in an appropriate and safe manner with two-stage crossings generally provided where crossing distances will be in excess of 19m. Additionally, there will be an increase in the number of raised table crossings on side roads from 30 to 105, equating to a 250% increase.

6.7.8. I note concerns have been raised in relation to the design of a number of specific junctions, down to specific design features and extent of yellow boxes, and requests to separate out toucan crossing arrangements. On review of the junction design approaches and the evolution of the junction designs set out in the application documentation, I am satisfied that the design and arrangements provided at junctions are appropriate to ensure pedestrian, cyclist and vehicular safety while also working within the urban constraints present along the route to minimise impacts arising.

6.7.9. I note the following Major Signalised Junctions along the scheme:

- Templeogue Rd/ Templeville Rd
 - This junction will be based on Junction Type 1. Bus lanes and cycle tracks provided through the junction to facilitate bus priority and improved cyclist safety. Junction converted to protected junction type in accordance with BusConnects Design Guidelines to further improve cyclist safety.
- Templeogue Rd / Cypress Grove Rd
 - This junction will be based on Junction Type 1. Bus lanes and cycle tracks provided through the junction to facilitate bus priority and improved cyclist safety. Junction converted to protected junction type in accordance with BCPDGB to further improve cyclist safety.
- Templeogue Rd / Wellington Lane
 - This junction will be based on Junction Type 4. The existing roundabout junction is proposed to be replaced by a signalised junction with protection for cyclists. The proposed scheme will be compatible with the proposed Wellington Lane cycle scheme.
- Grange Rd / Rathfarnham Wood
 - This junction will be based on Junction Type 1. Junction is proposed to be upgraded to provide bus lanes and cycle tracks in both directions on Grange

Road western approach tying into existing facilities on the eastern approach. A fully protected junction is also proposed to improve cyclist safety.

- Rathfarnham Rd / Dodder Park Rd
 - This junction will be based on Junction Type 1. The existing junction is proposed to be altered by providing bus lanes in each direction on the northern and southern approaches as well as conversion of the junction to a protected junction for cyclists. No inbound bus lane is proposed north of the junction and no outbound bus lane is provided south of the junction with priority maintained in these locations using bus priority signals
- Rathfarnham Rd / Butterfield Ave
 - This junction will be based on Junction Type 1. Junction is proposed to be updated to provide bus lanes and cycle tracks in each direction. A fully protected junction is also proposed to improve cyclist safety.
- Rathfarnham Rd / Terenure Rd / Templeogue Road
 - This junction will be based on Junction Type 1. The existing junction is proposed to be altered by providing a bus lane on the southern approach and providing dedicated cycle facilities along Rathfarnham Road and Terenure Road North. The existing slip lane for traffic turning left from Rathfarnham Road will be removed to improve pedestrian facilities in the village centre. Bus Priority through the junction will be maintained through an inbound bus gate on Templeogue Road approaching the junction and a bus priority signal on Terenure Road East.

6.7.10. There are a number of junctions where the proposed changes are moderate – and are mainly reallocations of space to provide the bus and cyclist facilities, where the overall physical layout will remain largely the same. There are a total of c. 100 (not including access points for properties) minor junctions without signal control across the Proposed Scheme. There is one mini roundabout proposed as part of the Proposed Scheme on Military Road adjacent to St Mary's College.

6.7.11. Overall, the junction analyses show that all junctions along the corridor have feasible and functional signal staging plans which will ensure that buses will be able to proceed along the corridor with delays minimised, and that high quality crossing

facilities are provided for cyclists and pedestrians. Two particular locations where some overcapacity issues are noted are:

- Camden Street / Harrington Street / Richmond Street South: This junction is being upgraded in terms of pedestrian and cyclist facilities, including the provision of new controlled pedestrian crossings on the northern and western arms of the junction. It is also proposed to resolve an existing geometry issue which currently precludes buses and traffic from safely turning from Harrington Street onto Camden Street Upper at the same time, through phase separation of these movements. For forecast flows this junction does show some approach arms as overcapacity – but delays to buses are minimised, and provision for cyclists and pedestrians are much improved.
- Harold's Cross Road / Rathgar Avenue: This junction is being upgraded in terms of pedestrian and cyclist facilities, including the reallocation of road space to provide north/south segregated cycling facilities through the junction. Traffic re-distribution due to proposals on the main CBC corridor results in additional traffic using this junction as an alternative route. For forecast flows the junction does show some approach arms as overcapacity – but provision for cyclists and pedestrians are much improved.

6.7.12. The Junction Design Report in Appendix L of the Preliminary Design Report provides summaries of total theoretical movement capacity by each mode at each junction. The LinSig outputs show that the Proposed Scheme junction designs will operate effectively for the forecast flow scenarios with buses not subject to delay, and with appropriate provision within the signal operation for crossing movement of pedestrians and cyclists.

Spawell Junction

6.7.13. Concern has been raised with respect to the change to a signalised junction at the Spawell Roundabout and to footpath and cycle track tie-in at the junction. I note that the traffic and transportation section of South Dublin County Council and Dublin Cycling Campaign welcome the conversion of the Spawell roundabout on the R137 to a traffic-light controlled junction and acknowledge marked improvements for bus priority and active travel movements. The NTA have indicated that the pedestrian and cycle crossings at the Spawell Junction are physically separate, they will run in the same stage in order to minimise wait times. I agree that the replacement of the existing roundabout at Spawell with a signalised junction will improve facilities for

vulnerable road users at this important junction, through the provision of segregated crossing facilities for pedestrians and cyclists. I also note the NTA's approach that it is envisaged that the provision of a signalised junction will slow vehicle approach speeds, as vehicles are more likely to be required to stop than at the existing roundabout junction. I consider that the conversion of the Spawell Roundabout to a signalised junction (Junction Type 4) will significantly improve facilities for pedestrians and cyclists at this large junction, as well as facilitate bus priority through the junction and is welcomed. It is also noted that a two-way crossing is to be provided on Wellington Lane just north of the Spawell junction facilitating a two-way connection across Wellington Lane and onwards to the two-way cycle facility west of Spawell.

Templeogue Road Junction

- 6.7.14. Concern is raised of Proposed Bus gate and right-turn bans on Templeogue Road. Concern of design of Templeogue Bridge Junction (pedestrian crossings and cycling prioritised). Dublin Cycling Campaign submit that the Templeogue Bridge junction needs Dutch geometry to ensure it is a fully protected junction. It is noted that there appears to be no continuous cycling infrastructure provided on the southbound lane of the Old Bridge Road and this is an important link for the southern connection of the Ballyroan/Knocklyon and Firhouse areas as well as connectivity to the Dodder Greenway. The NTA have responded stating that the Templeogue Road / Old Bridge Road junction has been designed as a protected junction for cyclists. There is limited space available on Old Bridge Road and providing cycle facilities on this constrained link is not within the remit of the Proposed Scheme. It is intended that cyclists would continue on road through this section sharing with general traffic for c.170m
- 6.7.15. The GDA Transport Strategy states that it is intended to provide continuous bus priority, as far as is practicable, along the core bus routes, with the objective of supporting a more efficient and reliable bus service with lower journey times, increasing the attractiveness of public transport in these areas and facilitating a shift to more sustainable modes of transport, to facilitate this scheme objective, bus priority signalling has been proposed along Rathfarnham Road between Dodder Park Road and Castleside Drive as well as along Templeogue Road between number 210 Templeogue Road and 248 Templeogue Road wherein general traffic will be

managed by signals to facilitate bus priority along these constrained section of the Proposed Scheme. At the constrained section of the Proposed Scheme along Rathfarnham Road where a segregated inbound cycle track could not be achieved, a shared bus/cycle lane is provided over a length of approximately 260m. At the constrained section of the Proposed Scheme along Templeogue Road shared bus/cycle lanes are provided over the majority of this section, with the exception of a short 170m long section where outbound cyclists would share with general traffic.

- 6.7.16. Chapter 3 Consideration of Reasonable Alternatives of Volume 2 of EIAR outlined the extensive options assessment exercise which has been undertaken to determine the Preferred Route. In constrained locations, a balanced approach has been taken in selecting the Preferred Route Option. In some locations this has resulted in no segregated cycle facility being provided. It is noted that in these areas, cyclists will share with the bus lane and the speed limit has been reduced to 30km/h.
- 6.7.17. Table 4.1 of EIAR Volume 4 Proposed Scheme Description provides a summary of changes as a result of the Proposed Scheme. The table notes that in the existing scenario, 28% of cycling facilities, covering 11km in both directions, are segregated. However, under the Proposed Scheme, 85.4% of cycling facilities will be segregated, totalling 23.3km. This represents a substantial 112% increase in segregated cycling facilities along the proposed route. This I consider is a significant improvement and is to be welcomed.

Grange Road / Willbrook Road Junction

- 6.7.18. Concern is raised that the cycle lane on Willbrook Road does not extend to the junction (non-continuous) and that this could lead to conflict between cyclists and general traffic entering Willbrook Road from the junction.
- 6.7.19. The NTA response states that the Proposed Scheme in this location has been designed to reflect the existing arrangement on Willbrook Road, where the southbound cycle track does not extend as far as the junction.
- 6.7.20. As stated in the preceding section it is proposed to provide continuous cycle paths and lanes and bus priority where practical and possible, regard being had to the most appropriate design response in each location. Multiple options have been considered and I consider that the option chosen is appropriate.

Rathfarnham Road / Main Street Junction

6.7.21. I highlight that public realm improvements consisting of high-quality paving, landscaping and public lighting have been delivered in the vicinity of the proposed bus stop in this location by South Dublin County Council. As such, the design approach adopted by the NTA has been to minimise the impacts on this high-quality public realm where practicable, and retain the existing arrangement. As such, I agree that the shared landing zone bus stop arrangement is the most appropriate design response in this location.

Rathfarnham Road / Dodder Park Road Junction

6.7.22. It is noted that priority signals for cyclists are provided at this junction and that the junction has been designed as a protected junction for cyclists. The following is noted in the Junction Design Report:

“A four-stage signal operation is proposed. Mainline buses and cyclists will operate in the same stage through the junction, to be followed by mainline traffic in both directions. Traffic from side roads will operate together. Cyclists crossing from the side roads will operate with pedestrians due to the high volume of left turning traffic.”

6.7.23. Shared space has been provided at this junction to cater for two-way movements for cyclists connecting to the Dodder Greenway on Dodder Road Lower.

6.7.24. I am satisfied that the NTA have, on balance, chosen the most appropriate design at this junction to provide for present and future residents to travel by bus, walk and / cycle safely and directly to/from the city centre.

Rathdown Park / Rathfarnham Road Junction

6.7.25. Given the proximity of the junctions of Rathfarnham Road / Rathdown Park and Rathfarnham Road / Bushy Park Road these junctions have been modelled as a single linked junction. In order to facilitate bus priority and maintain people movement through these junctions, the provision of a pedestrian crossing between the two junctions has not been considered practicable. New signalised pedestrian crossings are proposed on the southern and western arms of the Rathfarnham Road / Rathdown Park junction which will improve pedestrian crossing opportunities in this location.

6.7.26. I accept the explanation of the NTA and the constraints at this location. I am satisfied that the NTA have on balance chosen the best and most useable option to provide

for present and future residents to walk and cycle safely and directly to/from the city centre.

Fergus Road Modal Filter

6.7.27. With respect to a request that a modal filter be installed on Fergus Road to discourage rat-running to and from Templeogue Road. It is noted that it is proposed to provide a right turn ban from Fergus Road onto Templeogue Road to avoid traffic attempting to bypass the proposed bus gate on Templeogue Road via Fergus Road. It is noted that the traffic modelling carried out and presented in Chapter 6 of the EIAR does not predict a significant increase in general traffic on Fergus Road. It is noted that a quiet street treatment is proposed on Rathdown Drive, Rathdown Crescent and Rathdown Park linking Templeogue Road to Rathfarnham Road and providing an alternative facility for inbound cyclists to access Terenure Village and beyond.

6.7.28. I accept the explanation of the NTA and the constraints at this location. I am satisfied that the NTA have on balance chosen the best option to enhance the capacity and potential of the public transport system, by improving bus speeds, reliability and punctuality, and to enhance the potential for present and future residents to walk and cycle safely and directly to/from the city centre.

New pedestrian crossing at Beechlawn Way

6.7.29. The NTA submits that the location suggested for the inclusion of a new pedestrian crossing at Beechlawn Way, is not feasible, as it is a busy commercial area, with a number of accesses, accessible parking bays, parking bays and a bus stop. As such, a pedestrian crossing in this location, with the requisite visibility splays, would require the removal of some of these existing facilities. A signalised pedestrian crossing is provided on the southern arm of the junction of Rathfarnham Road / Terenure Road East, approximately 50m from Beechlawn Way. As such, given proximity, it is considered appropriate for pedestrians to utilise the crossing at the junction. It is noted that the footpath across Beechlawn Way is proposed to be raised as part of the Proposed Scheme to prioritise pedestrians.

6.7.30. I accept the explanation of the NTA and the constraints / proximity issues at this location. I am satisfied that the NTA have on balance chosen the best option to provide for present and future residents to access bus stops, walk and cycle safely and directly to/from the city centre.

Cycle Lanes on Terenure Place and Terenure Road East

- 6.7.31. With respect to removal of existing cycle lanes on Terenure Place and Terenure Road East. The NTA acknowledges that the existing advisory cycle lanes on Terenure Place and Terenure Road East are not included in the Proposed Scheme design. It is noted that the existing cycle lanes referred to are advisory cycle lanes which are marked by a broken white line which allows motorists to enter or cross the lane. These existing lanes range in width from approximately 1.0m to 1.2m. Advisory cycle lanes were an option available to designers under the National Cycle Manual, however, are not included in the recently published Cycle Design Manual which notes the following in Section 4.2.8: “The use of narrow advisory cycle lanes with dashed edge lines are no longer recommended.”
- 6.7.32. While the scheme design was carried out in advance of the publication of the Cycle Design Manual, this statement reflects a recent move in the industry away from the provision of narrow, advisory cycle lanes, which the Proposed Scheme design has taken account of. It is further noted that alternative cycle facilities have been provided on Rathdown Drive, Rathdown Crescent and Rathdown Park linking Templeogue Road to Rathfarnham Road, alternative cycle route and quiet street treatment is proposed on Bushy Park Road, Wasdale Park, Greenmount Road, linking Rathfarnham Road to TRE as well as segregated cycle tracks proposed on Terenure Road North and Harold’s Cross Road providing an alternative route for cyclists accessing the city centre.

Terenure Road East / Aldi Entrance

- 6.7.33. The Dublin Commuter Coalitions request that a continuous footpath is provided at Terenure Road East / Aldi Entrance is noted. The NTA response states:

“A continuous footpath at the entrance to Aldi would require acquisition of private lands to construct, due to the existing levels at the entrance. As such, it has been decided that a continuous footpath in this location would not be appropriate”.

- 6.7.34. The response is considered reasonable and justifiable. There is no change to the existing arrangement which does not give rise to a traffic safety concern.

Camden Street Upper / Charlotte Way Junction

- 6.7.35. Concern is raised with respect to the pedestrian island proposed. The NTA response submits that the retention of the central traffic island at this junction is required for

traffic safety reasons. Due to the geometry and permitted movements at the junction, the traffic island is required to direct traffic to Charlotte Way.

6.7.36. I accept the explanation of the NTA and the constraints at this location. I am satisfied that the NTA have on balance chosen the best and most useable option to provide for present and future residents to walk and cycle safely and directly to/from the city centre.

South Great George's Street Bus Stop

6.7.37. Concern is expressed that the location of the proposed bus shelter on South Great George's Street does not align with the pedestrian island in this location, which may lead to pedestrians walking in the cycle track to access the bus stop.

6.7.38. The NTA response sets out that given the presence of a significant number of shop fronts along South Great George's Street, it is not possible to provide a bus shelter at the back of the footpath. As such an alternative layout, which is included as Figure 36 the Preliminary Design Guidance Booklet (PDGB), is proposed. I note that the PDGB sets out: "In particularly constrained locations within urban centres, where the provision of a bus shelter at the rear of the footpath is not possible due to the presence of frontages, a variation of the Shared Bus Stop Landing Zone arrangement may be considered. This option provides a cantilever bus shelter adjacent to the carriageway, to maintain access to frontages at the back of the footpath."

6.7.39. I accept the explanation of the NTA and the constraints at this location. I am satisfied that the NTA have on balance chosen the most desirable option to provide the most useable option for present and future residents to walk and cycle to/from the city centre.

Bushy Park Quiet Neighbourhood

6.7.40. With respect to the concern that vehicles will not adhere to the proposed 30 kph speed limit on the proposed quiet streets linking Bushy Park Road to Orwell Road. The NTA acknowledges the comments raised in relation to camera enforcement.

6.7.41. I note that enforcement of speed limits is a matter for An Garda Síochána, however it is considered that sufficient traffic calming measures are provided which will

encourage slower speeds on this section of the proposed scheme. It is noted that the existing ramps are maintained. There is also parking along this section of the scheme which narrows the available carriageway width, as well as street trees which provide a sense of enclosure which will further contribute to a traffic calmed environment.

Templeogue Road / Old Bridge Road

6.7.42. The comments in relation to the pedestrian crossings at the junction of Templeogue Road and Old Bridge Road are noted. There is no existing pedestrian crossing on the western or southern arms of this junction. It is proposed to install a new signalised pedestrian crossing on the southern arm of the junction, which will significantly improve facilities for pedestrians at this junction. Due to the geometry of the junction, the provision of an additional crossing on the western arm would require vehicular stop lines to be set back significantly, which would lead to delayed people movement at the junction.

6.7.43. I accept the explanation of the NTA and the constraints at this location. I am satisfied that the NTA have on balance chosen the best and most useable option to provide for present and future residents to walk and cycle safely through this junction.

Templeogue Road Quiet Street

6.7.44. I note concerns expressed that it would be preferable to see better road markings or signage indicating the crossing for east bound active travel users so that cyclists don't end up in dead ends. Additionally, the requests that traffic calming measures be installed on this section.

6.7.45. The NTA response submits that the proposed toucan crossing will be visible to cyclists utilising the roundabout. It is considered that the proposed signage is suitable. The quiet streets are narrow, residential streets with limited volumes of traffic. It is noted that existing traffic calming features, including speed ramps, will be retained.

6.7.46. I accept the explanation of the NTA given the constraints at this location. I am satisfied that the NTA have proposed a reasonable and sound signage strategy and that traffic calming measures proposed are, on balance, reasonable and competent to provide for present and future residents to walk and cycle safely and directly to/from the city centre.

Junction of Lennox Street and Richmond Street South

- 6.7.47. Concern of traffic congestion on Syngé Street, Shaw Court, Stamer Street, Kingsland Park Avenue, Victoria Street, Bloomfield Avenue and surrounding routes due to road closure of Lennox Street to general traffic.
- 6.7.48. The NTA submit that there are currently 10 vehicular access points to the area bounded by Richmond Street to the east, Harrington Street/South Circular Road to the north, Clanbrassil Street to the west and the Grand Canal to the south. This is considered to be an extremely permeable network of roads. The effect of this permeability is that traffic volumes in the area are well spread among the various access/egress points ensuring that no one road is overloaded. With the closure of the Lennox Street/Richmond Street junction to traffic, a further 9 access points will remain to the area thereby retaining excellent vehicular permeability through this area. While it is noted that some of the roads are narrow, the permeability of the road network ensures that volumes on these roads are low and manageable within the constraints. I note other options were considered and discounted.
- 6.7.49. I accept the explanation of the NTA given the constraints capacity for sustainable modes of transport transversing this location. I am satisfied that the NTA have on balance chosen a defensible option to provide for present and future residents to walk and cycle safely and directly to/from the city centre, while still retaining access for private cars.

Castlewood Avenue Junction with Upper Rathmines Road

- 6.7.50. Some submissions noted that access to/from Rathmines could be improved by permitting the right turn from Castlewood Avenue onto Rathmines Road Upper and the left turn from Rathmines Road Upper onto Castlewood Avenue.
- 6.7.51. The NTA submit that the proposed shuttle arrangement on Mountpleasant Avenue is to mitigate against long local diversions required due to the proposal to provide a bus gate on Rathmines Road Lower. While a number of submissions suggested that the mitigation could be achieved by permitting the left turn from Rathmines Road Lower to Castlewood Avenue and the right turn from Castlewood Avenue to Rathmines Road Lower, both of which are currently banned. It is noted that the current bans in this location are to remove the Leinster Road – Castlewood Avenue routing which is a continuation of an east-west/west-east connection via Chelmsford Road and Waterloo Road further to the east that acts as an alternative to a route along the

canal via Mespil Road – Grand Parade-Canal Road – Grove Road. The introduction of the right turn movement from Castlewood Avenue would reconnect this east-west route and result in a further increase in traffic along Castlewood Avenue which would in turn increase inbound volumes on Rathmines Road Lower and affect the movement of inbound buses through this area between the Castlewood Avenue and Leinster Road junctions. For this reason, it was not considered to be an appropriate solution.

- 6.7.52. In terms of the left turn from Rathmines Road Lower, the introduction of this movement would be difficult to achieve safely given the acute angle at which Castlewood Avenue joins Rathmines Road Lower. It would also potentially impact on safety for southbound cyclists travelling through the junction. Furthermore, the proposed removal of the right turn ban from Leinster Road to Rathmines Road Lower to improve vehicular access to the south of Rathmines from the north (including Swan Centre), in combination with the removal of the left turn ban onto Castlewood Avenue would reinstate the Leinster Road – Castlewood Avenue west-east road resulting in an increase in traffic on Castlewood Avenue.
- 6.7.53. Given the foregoing, the NTS submit that the proposed mitigative traffic management measures in Rathmines, namely the shuttle system on Mountpleasant Avenue, provides a more appropriate means of facilitating access to/from the east of Rathmines.
- 6.7.54. I accept the considered explanation of the NTA and the constraints at this location. I am satisfied that the NTA have on balance chosen the best and most useable options to provide for enhanced capacity of public transport, cycling and walking for present and future residents to transverse safely and directly, via this area to/from the city centre.

Junction of Rathmines Rd and Rathgar Rd

- 6.7.55. It is proposed to upgrade the junction of Rathmines Road Upper with Rathmines Road Lower/Rathgar Road through the provision of kerb protection for cyclists. Concern is expressed at the removal of the slip lane at the junction of Rathmines Road and Rathgar Road. DCC notes that the reconfiguration of the junction of Rathmines Road and Rathgar Road creates an opportunity for place-making but that the footpaths in the commercial village area are reduced or maintained in width, only, by the Proposed Scheme.

6.7.56. The NTA has responded that the junction of Rathmines Road and Rathgar Road has been redesigned to remove general traffic slip lanes and to provide more space for pedestrians, accommodate new cycle tracks and the creation of a new urban realm enhancements, incl. plaza space on the far side of the junction, with seating, ornamental planting and tree planting. The NTA sets out that upgraded public realm will be provided at this junction through the reallocation of road space. It is also proposed to widen footpaths along Rathmines Road Lower, within the urban village of Rathmines where significant commercial activity takes place.

6.7.57. I accept the explanation of the NTA and the constraints at this location. I am satisfied that the NTA have on balance chosen the best and most useable option to provide for place-making and to provide for present and future residents to walk and cycle safely and directly to/from the city centre.

Rathgar Road / Highfield Road Junction

6.7.58. At Rathgar Village, the carriageway at the adjoining junction is to be rationalised to reduced vehicular space and to provide additional pedestrian and public realm space. It is submitted that the slip lane from Highfield Road will be removed and this will facilitate the provision of a greatly increased public realm amenity space, with hard and soft landscaping along the shop frontages, that will incorporate seating, tree planting and low-level planting to encourage passive amenity. Medians will be introduced and will incorporate low level planting to further reduce the apparent width of the carriageways. Pavement and kerbs will be re-built using high quality materials sympathetic to the form of the surrounding traditional buildings and the character of the village setting. Importantly, the emerging design avoids impacting the boundary of Christ Church and the mature trees within the grounds and the distinctive focal point of the village will be retained as existing. I consider this to be an acceptable approach.

Terenure Cross junction

6.7.59. A number of submissions notes concern around the operation of the Terenure Cross junction with the Proposed Scheme in place. In particular, the introduction of a right turn for buses/taxis from Rathfarnham Road to Terenure Road East is considered to be unsafe and it is submitted that it will create traffic congestion.

6.7.60. The Junction Design Report in Appendix A6.3 of the EIAR Volume 4 Part 2 of 4 presents a LinSig analysis for all major junctions along the Proposed Scheme with

the assessment for Terenure Cross presented on page 34. This illustrates that the junction would be operating at capacity in both the morning and evening peaks. While the junction may be congested during the peak periods, it will be safer for pedestrians and cyclists through the introduction of shorter, more direct pedestrian crossings as well as upgrading crossings to toucan crossings. The proposed arrangement will also ensure that buses have priority through the junction.

6.7.61. I note concerns outlined and I note that Terenure Crossroads is a pinch point. I believe the NTA have given considerable, in-depth thought and assessment on permeability for buses / for a sustainable transport scheme through this junction. The Toucan Crossing Junction design, removal of the existing left hand slip lane from Rathfarnham Road to Terenure Place / Templeogue Road, signal controlled priority for bus lane, omission of cycle lanes from Terenure Place and TRE, provision of an off-street cycle route / quiet street proposal from Rathfarnham Road to TRE / Highfield Road via Bushy Park Road, Victoria Road, Zion Road and Orwell Road and the right turn bans proposed affirm this. Also, the design proposed avoids land-take and significant impacting upon Saint Joseph's Church and other properties on either side of TRE close to the junction. Overall I consider the proposal at Terenure Crossroads to be acceptable.

Junction Design Conclusion

6.7.62. The NTA response clearly states that no two junctions are the same. As stated above, junctions on the Proposed Scheme have broadly been categorised into 4 types of junction. A detailed description of the junction types on the Proposed Scheme is provided in the Preliminary Design Report. The junction types set out in the PDGB directly align to the Proposed Scheme core aim and objectives. One of which is to:

“Enhance the potential for cycling by providing safe infrastructure for cycling, segregated from general traffic wherever practicable.”

6.7.63. I highlight that the assessment of routes and options was an iterative process and, great care was taken to minimise the impact on adjacent properties and to reduce land acquisitions to the extent possible while still meeting the project's objectives. This approach was adopted to balance the necessity of the development with the preservation of the interests and rights of property owners in the area.

6.7.64. The proposed scale of the BusConnects CBC Infrastructure Works will be transformational for cycling in Dublin, delivering a large number of the primary cycling routes identified in the Greater Dublin Area Cycle Network plan. With proposals of this scale, it is critical that the overall design approach matches the stated ambition and can achieve a longevity that such investment deserves.

6.8. Bus Stops

6.8.1. The provision of bus stops throughout the scheme is critical to its overall successful function. Concerns have been raised in relation to the locations and designs of the bus stop infrastructure proposed. I highlight in particular:

- DCC notes that the distance between bus stops is longer than existing in some locations.
- Third party concerns with respect to:
 - The removal of one of the outbound bus stops on Georges Street.
 - Relocation of inbound bus stop, at No. 34 Terenure Road East to the front of No. 12, adjacent to No's. 14 & No. 16 Terenure Road East (TRE) (which are protected structures) in terms of traffic safety, health, privacy.
 - The NTA response re distance between bus stops to the front of 12 TRE is insufficient, will increase the distance between stops and impact / impede vehicular access.
 - Object to relocation of the city bound bus stop on Rathgar Road to outside no. 77 – no. 80 Rathgar Road on traffic safety grounds. Suggest relocating it to No. 95 – 96 Rathgar Road, closer to the village and in proximity of two large apartment blocks. The proposed distance between bus stops on Rathgar Road is in excess of 400m.
 - Consolidation of two bus stops from 239-237 to 217-219 Templeogue Road between Templeogue Village and Fortfield Road junction is on course for accidents, is entirely unsuited, as traffic turning left on to the Fortfield Road will encounter mayhem. Unacceptable from a footpath width and flooding perspective.
 - Concern of relocation of Bus Stop to 217 Templeogue Road. Concern raised by Mona Stafford with respect to legally disabled driver and

requirement for an adapted car. The ground at No. 217 is prone to flooding.

- The bus stop on Templeogue Road at Bushy Park and Terenure College is being moved to a new location on a part of the road prone to flooding and where the footpath is very narrow.
- Removal of bus stops and reduced service along Bushy Park Road.
- Removal of the outbound bus stop at Westbourne Road.
- Removal of the inbound bus stop at Lakelands Park.
- The two bus stops at Our Lady's will be consolidated into one with no bus shelter. These are busy stops for children alighting to go to school.
- Removal of bus stop at Rathmines Park inbound and outbound.
- Relocation of the bus stop at Garville Ave inbound to Winton Avenue.
- Removal of the outbound bus stop at Brighton Road.
- Relocation of the inbound bus stop near Brighton Road to Rathgar village.
- Concern of distance between bus stops. No outbound bus stop at the garda station in Rathmines.
- The existing bus stop at Earls Court, No. 80 Terenure Road East is a health and safety issue for access and egress into Earls Court. It is requested that this bus stop be relocated (Stonepark Investments Ltd).

*Inspectors Note: I note the submissions from Senator Mary Seery Kearney, Anna Shanley and Ryan Stempniewicz, Anne Marie James, Anne Neary and Conor Farren, Bertha Walsh, Betty Murphy, Brendan Heneghan, Nora McCaul, Cllr Yvonne Collins, Davis Byrne, Dolores Dee Gafney, Stephen Bailey, John Shanahan, Maura Byrne, Mona Stafford, Paula and Ray Moore and Grainne O'Neill and Others, who are among others who highlight concerns, set out above.

6.8.2. I also note submission by Ben Costello (see submission 30 of Appendix 1) Conor Ryan & Siobhan Ryan (see submission 68 of Appendix 1) which welcomes the proposal to streamline and relocate the existing bus stops and quiet street treatment proposed as part of the scheme.

6.8.3. In relation to the location of bus stops, the overall approach has been to ensure that they are located close to local facilities, have an approximate spacing of 400m (suburban) and 250m (urban centres), be close to the nearest junction/pedestrian

crossing, be located downstream of a junction rather than upstream, have sufficient space for associated infrastructure (shelter, waiting area, Real Time Passenger Information [RTPI] displays, boarding and waiting areas, cycle tracks and footpaths etc.), and consider the potential for interchanges with other transport routes. The primary considerations in locating bus stops includes minimising the walking distance between interchange stops (for accessing orbital bus routes as well as other public transport services such as the DART), and to ensure stops are located proximate to pedestrian crossings to ensure safety of access. In general, in relation to the location of bus stops I am satisfied that the above approach has been adopted insofar as is practicable, however, having regard to the nature of the development of any urban project such as that proposed there is a need to consider the locations of existing bus stops, characteristics of the various locations and constraints that are in place along the route that may necessitate a deviation from the preferred approach. The rationalisation of bus stops has led to some stops being retained, others removed, and some being omitted.

- 6.8.4. There are currently 19 bus stops along Section 1 of the Proposed Scheme. 10 inbound and 9 outbound. There are 18 bus stops along Section 2 of the Proposed Scheme. 9 inbound and 9 outbound. There are 13 bus stops along Section 3 of the Proposed Scheme between the R137 Terenure Road North and Charleville Road. 6 in bound and 7 outbound. Along the R137 Terenure Road North and R137 Harold's Cross Road, there are 13 bus stops. 7 inbound and 6 outbound. There are 24 bus stops along Section 4 of the Proposed Scheme. 13 inbound and 11 outbound.
- 6.8.5. It is proposed that there will be a total of 16 bus stops along Section 1 of the Proposed Scheme – eight inbound and eight outbound. This is three fewer outbound stops. The description of impact is stated as number of stops rationalised from 19 to 16, optimisation of spacing and journey times. Bus stops are located in more convenient locations for communities and access to signalised crossings. It is submitted the proposal will give rise to moderate improvements to bus stop facilities throughout.
- 6.8.6. It is proposed that there will be a total of 15 bus stops along Section 2 of the Proposed Scheme – seven inbound and eight outbound. This is three fewer than existing. The description of impact is stated as: Bus stops are located in more convenient locations for communities and access to signalised crossings. It is

submitted the proposal will give rise to slight improvements to bus stop facilities throughout.

- 6.8.7. Under the Proposed Scheme, there will be a total of 22 bus stops along Section 3 with two fewer inbound, and two fewer outbound stops, than existing. The impact is described as positive significant.
- 6.8.8. Under the Proposed Scheme, there will be a total of 22 bus stops along Section 4 with two less than existing. The layout of new bus stops is considered to better serve the existing and future catchment and be closer to existing and new pedestrian crossing facilities for improved convenience.
- 6.8.9. It is proposed to relocate 25 (35%) of the existing bus stops (inbound and outbound) along the Proposed Scheme. It is also proposed to remove 13 bus stops from the Proposed Scheme, and to add one bus stop, such that in this case the number of stops on the Proposed Scheme will reduce from 72 to 60.
- 6.8.10. I note that the NTA response to submissions sets out that as part of the design of the Proposed Scheme a detailed review of bus stop locations was undertaken as set out in Bus Stop Review Analysis in Appendix H of the Preliminary Design Report provided as Supplementary Information. The NTA welcomes Dublin Commuter Coalition's comments in relation to the importance of considering the pedestrian/cyclist interaction at bus stops. Section 11 of the Preliminary Design Guidance Booklet (PDGB) within Chapter 4 Proposed Scheme Description Appendix A4.1 of Volume 4 of the EIAR sets out the key measures to address the concerns raised in relation to vulnerable users at these locations which is further elaborated in Section 4.14 of the Preliminary Design Report in the Supplementary Information. These details have evolved as a result of direct consultation between the NTA and representative mobility groups, accessibility audits and road safety audits which have been carried out during the development of the Proposed Scheme.
- 6.8.11. With respect to bus stops on Templeogue Road, it is submitted that consolidation of bus stops 1158 and 1159 to outside 217 and 219 Templeogue Road aligns with bus stop location principles.
- It is located close to the Fortfield Road junction increasing accessibility from the large residential catchment along, and accessed off, Fortfield Road.

- It is noted that while there is a preference for a bus stop to be located on the exit side of a junction, as there is no bus lane on the exit side in this instance it is preferable to locate the stop at its proposed location.
- It is located close to pedestrian crossings facilitating safe access to the eastern side of Templeogue Road, including Our Lady's School – existing stops are c. 120m from the nearest controlled crossing point.
- It facilitates better stop spacing with 400m between the prior and subsequent bus stops – existing distance between stops is 320m (between stop 1157 and 1158) and 260m (between stop 1158 and 1159);
- The same footpath width is available at the proposed location as the current location.

6.8.12. With respect to bus stops on Templeogue Road at Lakelands Park (Bus stops 1161 and 1123) the revised location is closer to the proposed pedestrian crossing, and better serves the Rathdown Park catchment.

- It facilitates better stop spacing inbound with 430m between it and the prior stop and 315m between it and the subsequent bus stop – existing distance between stops is 260m (between stop 1161 and 1160) and 265m (between stop 1161 and 1162);
- It facilitates better stop spacing inbound with 400m between it and the prior stop and 360m between it and the subsequent bus stop – existing distance between stops is 225m (between stop 1122 and 1123) and 265m (between stop 1123 and 1124)

6.8.13. With respect to bus stop 1160 – Terenure College. The reason for the relocation of this bus stop is noted as: "This location is closer to the pedestrian crossing better serving the Rathdown Area. Stop is also closer to the Terenure College Entrance." The proposed location of the bus shelter is between two residential accesses and the NTA is satisfied that it will not adversely impact on these adjacent properties.

6.8.14. With respect to a reduction in the number of Bus stops on Templeogue Road and generally the NTA have responded by setting out the overall objectives of the proposed scheme relating to enhancing capacity of the public transport system and

enhancing safe infrastructure for cycling are underpinned by the central concept and design philosophy of 'People Movement'. It is submitted that the bus priority infrastructure improvements and indeed the level of protection it will provide to bus journey time consistency and reliability will provide a significant level of resilience for bus services that will use the Proposed Scheme from implementation into the future. The resilience provided by the Proposed Scheme will allow the service pattern and frequency of bus services to be increased into the future to accommodate additional demand without having a significant negative impact on bus journey time reliability or the operation of cycle and pedestrian facilities. In order to assess this resilience and the potential impacts of this resilience on carbon emissions, an additional analysis has been undertaken.

- 6.8.15. With respect to relocation of bus stop 1130 west of the Cypress Grove Road junction, the following is noted in the Bus Stop Review Report contained in Appendix H of the Preliminary Design Report in the Supplementary Information: "Stop to be moved 160m West. This location places the stop after the junction, which aligns with the principle of locating stops after junctions."
- 6.8.16. With respect to bus stops on Rathfarnham road and specifically relocation of Bus Stop 1334 to outside of 95 Rathfarnham Road, instead of retaining it. The NTA response states that, as per Table 4.21 Inline Bus Stops of Appendix H of the Preliminary Design Report, the location outside of 95 Rathfarnham Road was chosen as this location is closer to the junction with Dodder Park Rd and allows for this stop to be combined with existing stop 1334 thus improving bus stop spacing. It is also noted that the existing gradients along the relevant section of Rathfarnham Road are generally being retained.
- 6.8.17. With respect to bus stops on Terenure Road East and specifically relocation of bus stop from outside No. 34 TRE to the front of No.'s 12 and 14 TRE. The NTA submit that the proposal to relocate bus stop 1165 aligns with the bus stop location principles. namely:
- It is located closer to the Rathgar Village and the junction with Rathgar Avenue, Orwell Road and Highfield Road increasing accessibility from the large residential catchment along, and accessed off, these roads as well as providing more direct access to the village centre. It is noted that while there is a preference for a bus stop to be located on the exit side of a junction, as

there is no bus lane on the exit side in this instance it is preferable to locate the stop at its proposed location.

- It is located closer to pedestrian crossings (30m) facilitating safe access to the southern side of Terenure Road East – the existing stop is c. 110m from the nearest controlled crossing point.
- It minimises distance for a passenger interchanging between the A Spine and Route 80.
- It facilitates better stop spacing with 415m between it and the prior stop, 350m between it and the subsequent bus stop – existing distance between stops is 367m (between stop 1164 and 1165) and 362m (between stop 1165 and 1166);
- The footpath width is available at proposed location is approximately 0.7m greater than at the current location.

6.8.18. In terms of impact on heritage, the impact of the bus shelter on Architectural Heritage is considered in section 16.4.4.1 of Chapter 16 Architectural Heritage.

6.8.19. Bus shelters are proposed at:

- 12 Terenure Road East (DCC RPS 8063);
- 78 Rathgar Road (DCC RPS 7072);
- 153 Rathgar Road (DCC RPS 7120); and
- 46 Rathgar Road (DCC RPS 7046).

6.8.20. All four buildings are Protected Structures of Regional importance and of Medium sensitivity. I agree that the magnitude of impact of the Bus shelters will be low as in each case the Protected Structures are set back from the road behind existing, or in the case of 78 Rathgar Road (DCC RPS 7072) a reinstated boundary treatment, limiting the visual impact of the proposed bus shelters.

6.8.21. A bus shelter is proposed in front of 68 Rathmines Road Lower (DCC RPS 7193) a Protected Structure of Regional importance and of medium sensitivity and will be moved from number 60. The EIAR submits that the magnitude of impact is Low as the Protected Structure is set back from the road behind its boundary treatment which will limit the visual impact of the shelter. I concur the distance will mitigate the impact.

- 6.8.22. I note that a bus shelter is proposed in front of Templeogue Church and Cemetery (RMP DU022009001, DU022009002) a Protected Structure and Recorded Monument of Regional importance and medium sensitivity. Again, the magnitude of impact is assessed as Negligible, as the churchyard is over 30m from the proposed bus shelter. The assessment is considered valid and reasonable.
- 6.8.23. Vehicular access will be retained to properties adjacent to the proposed bus stop, namely No. 14 Terenure Road East. While access may be intermittently prevented by a bus loading/unloading at the bus stop, these instances will be short lived.
- 6.8.24. In terms of safety, the safety implications of the Proposed Scheme have been assessed by an independent auditor as part of the Road Safety Audit carried out on the Proposed Scheme and included in Appendix M of the Preliminary Design Report provided in the Supplementary Information. It is noted that no concerns were raised relating to the arrangement at the proposed bus stop or layout of the adjacent Rathgar Road/Rathgar Avenue/Orwell Road/Highfield Road junctions. In terms of concerns around congestion at the junction, Page 37 of the Junction Design Report in Appendix A6.3 of the EIAR Volume 4 Part 2 of 4 presents the junction assessment results at the Rathgar Road / Highfield Road / Orwell Road / Terenure Rd East junction in each peak period where it is demonstrated that the junction will operate at capacity in each peak hour. However, it is noted that the junction will be safer for pedestrians and cyclists and ensure that buses have priority through the junction.
- 6.8.25. With respect to relocated bus stop outside No.77 - 80 Terenure Road East. There is very limited space between the two garden entrances in the existing location. The proposed location lies in front of gardens with no vehicular entrances, allowing more space for the stop to be located here. The primary reason for the relocation of this bus stop, 50m north, is the available space between driveways which at only c. 5m currently is insufficient to accommodate the proposed bus stop layout. The proposed bus stop location provides c. 9.5m between driveways providing adequate space to accommodate the bus stop design. The proposal to relocate bus stop 1165 aligns with the bus stop location principles namely that it facilitates better stop spacing with 367m between it and the prior stop, 400m between it and the subsequent bus stop – existing distance between stops is 280m (between stop 1165 and 1166) and 235m (between stop 1166 and 1167). It is noted that if stop 1165 was retained in its current location the distance would extend to 450m between stops. It is further noted that positioning the bus stop in the suggested location outside 95-96 Rathgar Road would

leave only 200m between it and the prior stop and c. 600m to the next stop just north of Grosvenor Road. In terms of safety, the safety implications of the Proposed Scheme have been assessed by an independent auditor as part of the Road Safety Audit carried out on the Proposed Scheme and included in Appendix M of the Preliminary Design Report provided in the Supplementary Information. It is noted that no concerns were raised relating to the arrangement at the proposed bus stop.

- 6.8.26. It is noted that bus stop cage at 42 Richmond Street is offset from the bus shelter. This location is considered particularly constrained. The proposed bus stop layout in this location is a Shared Bus Stop Landing Zone arrangement. Given the presence of a number of business frontages along Richmond Street, the offset bus shelter is considered the most appropriate design response, which provides a bus shelter for waiting passengers without impacting on adjacent businesses. The bus shelter has been placed downstream of the bus stop location to ensure waiting passengers have sufficient visibility to approaching buses.
- 6.8.27. Further detail on proposals for individual bus stops are included in the Bus Stop Review Report, included in Appendix H of the Preliminary Design Report in the Supplementary Information. In relation to the removal of existing bus stop 1283 on South Great George's Street, this bus stop is currently located 60m from the preceding stop (bus stop 1282) and 200m from the next stop (bus stop 4456) therefore its removal is aligned with the principles of the bus stop review. In relation to the existing stop at the Garda Station in Rathmines, this stop is proposed to be relocated approximately 100m further south. The existing stop is located in a shared bus / traffic lane and a stopped bus would therefore restrict movement of traffic. The revised location allows the stop to be located within a bus lane.
- 6.8.28. It is expected that the overall bus journey time along the Proposed Scheme will be optimised as a result of these changes, while also maximising catchment. The removal and consolidation of bus stops will lead to less time lost due to dwell times at stops and the associated time lost due to deceleration and acceleration before and after the bus stops. Additionally, operational improvement such as the placement of bus stops after junctions should serve to reduce journey times as well as improve visibility at junctions.
- 6.8.29. The preferred bus stop arrangement is the island bus stop. Where space constraints do not allow for the island bus stop arrangement to be provided, an alternative share

bus stop landing zone arrangement has been provided. While some concerns have been raised by third parties in relation to the safety of the bus stop designs due to the potential for conflicts between cyclists and bus users, I am satisfied that the measures proposed, which include deflection of cyclists behind the bus stop, narrowing of the cycle track, LED warning studs, the inclusion of speed controls including ramping the cycle track up, cycle track road markings as well as pedestrian push button controls for cycle signalling (island bus stops) all combine to maximise pedestrian and cyclist safety. I also note that the design of bus stops has been informed by carrying out traffic safety and accessibility audits to ensure safety for all users and that vulnerable users of services (including wheelchair users) are adequately protected. I am also satisfied that provisions have been made for the visually impaired through the use of tactile paving and the provision of signal call buttons for crossing cycle tracks to provide a safe and accessible environment. On review of the detailed design of the proposed bus stops, I am satisfied that the applicant has had regard to the requirements of the mobility and visually impaired and that the bus stops have taken adequate and appropriate measures to ensure accessibility and safety for all users, including cyclists, bus passengers and pedestrians.

6.8.30. Relocation of a bus stop/s may also have knock-on impacts on the location of other stops. Overall, having assessed their location and siting along the overall route, I am satisfied that the location of bus stops along both the inbound and outbound sections of the route are at appropriate locations and I do not consider that any require relocation. I am satisfied that the competent authority in this case the NTA will ensure that issues of gradient, SuDS issues and or flooding will be satisfactorily resolved by way of design and the location of the bus stops is appropriate and acceptable to provide for the needs of the local population and wider travelling public.

6.9. Bus Gates

6.9.1. BusConnects is first and foremost a comprehensive programme of bus priority installation and associated infrastructure along the Core Bus Corridors of Dublin City. The main purpose of the programme is to improve public transport in the main urban areas by redesigning the bus network.

6.9.2. It is an aim of the Proposed Scheme to enhance the capacity and potential of the public transport system by improving bus speeds, reliability, and punctuality through the provision of bus lanes, bus gates and other measures to provide priority to bus movement over general traffic movements.

6.9.3. Two bus gates are proposed as part of the Proposed Scheme:

One between Richmond Hill and Lissenfield on Rathmines Road Lower.

- An inbound and outbound bus gate is proposed on Rathmines Road Lower between Richmond Hill / Military Road and Lissenfield.
- A shared lane is proposed in each direction for buses and general traffic on Rathmines Road Lower from Castlewood Avenue to Grove Road - which is approximately 840m in length.
- This bus gate is proposed to operate from 06:00 to 20:00 and, as such, signage is proposed to enable general traffic on Rathmines Road Lower to enter the bus lane and continue through the bus gate outside of these hours.
- The bus-gate will eliminate general through traffic and thereby reduce the overall vehicular demand and provide opportunities for improving pedestrian and cycle facilities along the road. The wider pavements and cycle tracks will combine visually to substantially widen the pedestrian zone along both side of the street and to reduce the perception of carriageway to the minimum. New footpaths and cycle tracks will be built using high quality materials to enhance the character and presentation of the streetscape and to provide greater pedestrian facilities and amenity that will in turn underpin the vitality of the retail and services business along the street. There will be some new street tree planting together with localised soft landscaping interventions to soften and add diversity and amenity to the streetscape. A bus gate at Military Road and Richmond Hill will substantially reduce traffic volumes along Rathmines Road and contribute to the establishment of a much stronger pedestrian streetscape.

A second on Templeogue Road between Olney Grove and Terenure Road West.

- A second inbound, only, bus gate is proposed on Templeogue Road between Olney Grove and Terenure Road West, at the junction of Olney Grove. This results in a shared inbound lane for buses and general traffic on Templeogue

Road from Fortfield Avenue to Terenure Place - which is approximately 1.2km in length. This bus gate is proposed to operate from 06:00 to 20:00 and, as such, signage is proposed to enable inbound general traffic on Templeogue Road to enter the bus lane and continue through the bus gate towards Terenure Cross outside of these hours.

- The inbound Bus Gate at the junction of Olney Grove, will restrict northbound general traffic on Templeogue Road from accessing Terenure Road West or Terenure Place during the hours of operation of the Bus Gate (06:00 – 20:00, 7 days a week). A right turn ban is proposed from Fergus Road to Templeogue Road, and a left turn ban from Olney Grove to Templeogue Road.
- Right turn bans are also proposed from Templeogue Road to Rathdown Park and to Rathdown Avenue and from Fortfield Road to Greenlea Road and to Lavarna Grove in order to prevent through traffic diverting inappropriately. A quiet street treatment to Rathdown Crescent and Rathdown Park is proposed which will link to Section 2 of the Proposed Scheme at the junction of Rathdown Park and Rathfarnham Road.

6.9.4. Concerns that have been raised in relation to this element of the Proposed Scheme are primarily based on the restrictions which will apply to general traffic accessing Rathmines and Terenure, and the impact arising from accessibility and commercial enterprise.

6.9.5. I note that bus gates are common features in urban transport systems and that the provision of the bus gates allows bus priority to be retained without having to provide dedicated bus lanes along Terenure Road west and Rathmines Road Lower. This minimises the land take requirements for the scheme, mitigates visual impacts, allows the retention of parking and provision of generous footpaths and planting while also providing for cycle lanes as well as maintaining bus priority. Furthermore, I note that alternative means of access will be retained for those who wish to use private cars, albeit, I acknowledge that these routes will be more circuitous when approaching from the south and west of the city than that currently available.

6.9.6. Overall, I consider the provision of the bus gates and their operational hours to be appropriate and in the best interests of promoting the use of sustainable modes of transport, ensuring public transport priority, and minimising the overall impacts of the

Proposed Scheme. I note that contrary to the opinion that bus gate hours should be shortened, some submissions consider 24/7 bus gates should be introduced. That the scheme does not go far enough to change habits and afford consistent, dedicated priority for delivery of an efficient, low carbon and climate resilient public transport service, supporting the achievement of Ireland's emission reduction targets.

- 6.9.7. I am satisfied with the overall level of priority afforded to buses along the route. The figures presented in the EIAR show that the Proposed Scheme will have beneficial impacts in terms of time savings and reliability for bus services. It has also been shown that there is the scope to increase the number of bus services on the route without compromising reliability.

6.10. Rathgar Road

- 6.10.1. A number of submissions received raised concerns in relation to the impact that the proposed one-way regime for general traffic on Rathgar Road would have on roads in the vicinity of the Rathgar Road due to rerouting of traffic. These submissions included references to increases in traffic, congestion and potential safety issues on roads such as Highfield Road, Rathmines Road Upper, Palmerston Park and Palmerston Road. Some submissions noted that the introduction of the right turn from Rathmines Road Upper to Highfield Road would encourage traffic to use these routes. Many submissions noted that these roads were unsuitable for accommodating additional traffic.
- 6.10.2. The applicant's response submits that the Proposed Scheme aims to provide an attractive alternative to the private car and promote a modal shift to public transport, walking and cycling on this key access corridor.
- 6.10.3. Overall, it has been determined that the impact of the reduction in general traffic flows along the Proposed Scheme will be a Positive, Moderate and Long-term effect whilst the impact of the redistributed general traffic along the surrounding road network will have a Negative, Slight and Long-term effect. Thus, overall, there will be no significant deterioration in the general traffic environment in the study area as a consequence of meeting the scheme objectives of providing enhanced sustainable mode priority along the direct study area.

6.10.4. In meeting its objectives, the Proposed Scheme will deliver strong positive impacts in terms of promoting active travel and sustainable transport. It is noted that the modelled forecasts for the 2028 opening year indicate:

- A significant decrease in people travelling to/from the city by car in each peak period with decreases of 30% and 39% in the AM and PM peak periods respectively;
- A significant increase in people travelling by public transport in each peak period with increases of 123% and 145% in the AM and PM peak periods respectively;
- A significant increase in people walking/cycling in each peak period with increases of 79% and 91% in the AM and PM peak periods respectively;

6.10.5. I note the assessment and survey work submitted by the NTA, in support of the proposed scheme, in relation to peak period traffic, junction capacity, dispersion to surrounding roads, determine they have the capacity to cater for the additional traffic volumes as a result of the proposed scheme. No material increase or decrease in traffic is anticipated along Highfield Road, Palmerston Road or Palmerston Park as a result of the Proposed Scheme.

6.10.6. The Proposed Scheme will result in an overall reduction in traffic along Rathmines Road Upper (-191 PCUs) in the morning peak period. It is noted that this is along the northern section Rathmines Road Upper. It is submitted that the majority of Rathmines Road Upper would see no material increase in traffic (+/- 100 PCU). An increase in traffic is projected on the southern part of Rathmines Road Upper (+113 PCUs). An increase in traffic is also projected along Palmerston Park (+238 PCU), although it is noted that this is just the portion in the middle of the Rathmines Road Upper/Palmerston Park/Dartry Road junction. Further junction capacity assessment was undertaken along these road links to determine they have the capacity to cater for the additional traffic volumes as a result of the Proposed Scheme.

6.10.7. I note that detailed traffic modelling has been undertaken of the Proposed Scheme to ensure that all impacts on traffic in the wider network is considered. In this regard I note that the Proposed Scheme would result in negligible impact on junctions along Palmerston Road, Palmerston Park and Rathmines Road Upper as a result of the Proposed Scheme. One junction, Palmerston Park/Sunbury Gardens would see a low impact.

6.10.8. In summary, the assessment presented in the Chapter 6 in Volume 2 of the EIAR indicates that while there is some redistribution of traffic as a result of the Proposed Scheme, the traffic impact is considered to be negligible. It is noted that a number of submissions raise concerns in relation to impact on access to St. Lukes Hospital. As noted above, it is not expected that there will be any increase in traffic along Highfield Road and as a result access to the hospital will not be affected.

6.10.9. I am satisfied that the NTA route selection process was well considered. The proposed scheme design is in accordance with National, Regional and Local policy, whilst minimising impacts on land take from private plots, impact upon trees/vegetation and consideration of cyclists and pedestrians. As outlined above, congestion occurs at present throughout the road network and the Proposed Scheme will reallocate road space to increase capacity for people movement. The Proposed Scheme will give rise to significant changes in the way that the street environment is experienced along the route of the CBC. Car dominance will be reduced but access by private car will be retained for the most part. Accordingly, I am satisfied that the proposed one way for general traffic on Rathgar Road is appropriate and adheres to the aims and objectives of the scheme as set out in the introduction to this report.

6.11. Pedestrian footpath widths and Public Realm

6.11.1. DCC Roads Division suggest that the scheme should seek to ensure sufficient and appropriate footpath widths of minimum 2m and seek to improve pedestrian connectivity to bus stops and ensure pedestrian priority for people with accessibility issues incl. visual impairments. DCC request by condition, confirmation that pedestrian traffic counts have been undertaken to ensure that footpath widths along the Proposed Scheme are sufficient to cater for anticipated pedestrian volumes. Concern is expressed by third parties that pedestrian safety and priority is ensured, particularly in the context of people with accessibility issues including visual impairments. Pedestrians should be ensured priority through design, signage and other appropriate measures. Residents are concerned that the proposal does not comply with minimum standards (for road width and footpath widths), DMURS Guidelines and objectives. Some submissions note that the proposal does not include enough improvements to the public realm in Rathmines, Rathgar and Terenure.

- 6.11.2. The Dublin Commuter Coalition submit that pedestrians need to be prioritised and junctions need to be in compliance with DMURS. Concern is expressed to safety of bus stop design and width of bus stop islands. More traffic calming is requested along Templeogue Road. I note paragraph 6.10 of this report above, Project / Junction Design, and paragraph 6.11 Bus Stops which sets out concerns raised, response by the NTA and my considerations in respect of junctions and bus stops along the route.
- 6.11.3. I note that the preferred bus stop arrangement is the island bus stop. The island bus stop arrangement provides a minimum 3.0m wide dedicated area for passengers boarding and alighting from buses, and segregates bus passengers from cyclists, who are deflected behind the island. Where space constraints do not allow for the island bus stop arrangement to be provided, an alternative shared bus stop landing zone arrangement has been provided.
- 6.11.4. The overall aim of the Proposed Scheme is to provide enhanced walking, cycling and bus infrastructure on this key access corridor in the Dublin region, which will enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor. The Proposed Scheme will greatly improve transport services for all that live along the route of the Proposed Scheme, by providing significantly improved sustainable transport options. Furthermore, it is an objective of the Proposed Scheme to ensure that the public realm is carefully considered in the design and development of the transport infrastructure and seek to enhance key urban focal points where appropriate and feasible.
- 6.11.5. The NTA confirms that pedestrian counts have been undertaken along the route of the Proposed Scheme. Chapter 6 of the EIAR outlines a Level of Service (LoS) assessment carried out in respect of pedestrian facilities. Section 6.4.6.2 of Chapter 6 notes the following in relation to the assessment of pedestrian infrastructure:
- “The Proposed Scheme consists of measures to enhance the existing pedestrian infrastructure along the direct study area. A Level of Service (LoS) junction assessment was undertaken using a set of five criteria to determine the impact that the Proposed Scheme has for pedestrians. The results of the impacted junctions demonstrate that the LoS during the Do Minimum scenario consists predominantly of the low C/ D / E ratings. During the Do Something scenario, i.e. following the development of the Proposed Scheme, the LoS consists predominantly of the

highest A / B ratings, with the exception of two Cs. Overall, the improvements to the quality of the pedestrian infrastructure will have a Positive, Significant and Long-term effect in all four sections of the Proposed Scheme.”

- 6.11.6. I note that it is proposed to widen footpaths on TRE from Terenure Cross to St Joseph’s boys N.S. within the commercial area of Terenure to provide additional space for pedestrians and businesses. Widened footpaths will be built using quality material commensurate with that of the built context of the village so as to enhance the character of the village locality. On Terenure Road North it is proposed to maintain the existing footpath widths on the eastern side of the road, to facilitate pedestrians and businesses. Footpath widths on Camden Street are proposed to generally be retained or increased. In some localised areas, it is proposed to reallocate some of the existing footpath width to provide a new cycle track and retain existing parking and loading facilities. It is noted that cycle track widths have been reduced below the desirable minimum of 2.0m wide in Camden Street due to the significant pedestrian demand on this busy commercial street, and to balance the provision of high-quality pedestrian and cyclist facilities while maintaining commercial loading and parking where practicable.
- 6.11.7. It is highlighted that Rathmines village will be re-configured and rationalised to reduce the overall carriageway widths and provide substantial additional public realm. Along the frontage of the retail units in Rathmines Village centre, the footway will be approximately 3.0m wide which is considered adequate for an area with a mid-high level of pedestrian activity in accordance with DMURS. Outside of Rathmines Village, where there is a more residential nature, the footway reduces to approximately 1.8m wide. The wider pavements and cycle tracks will combine visually to substantially widen the pedestrian zone along both side of the street and to reduce the perception of carriageway to the minimum. New footpaths and cycle lanes will be built using high quality materials to enhance the character and presentation of the streetscape and to provide greater pedestrian facilities and amenity that will in turn underpin the vitality of the retail and services business along the street. There will be some new street tree planting together with localised soft landscaping interventions to soften and add diversity and amenity to the streetscape. A bus gate between Richmond Hill and Lissenfield will substantially reduce traffic volumes along Rathmines Road and contribute to the establishment of a much stronger pedestrian streetscape.

- 6.11.8. I highlight the proposed provision of enhancements to junctions of Rathgar Road with Grosvenor Road, Rathmines Road / Rathmines Road Upper, including provision of a new public plaza space to the front of 302 to 312 Rathmines Road. There will be provision of high-quality stone paving to the plaza area, high-quality concrete paving to active frontage areas, block paving to parking bays, new tree and ornamental planting, as well as provision of new Sheffield cycle stands. Existing granite kerbs are to be reinstated
- 6.11.9. I note that it is proposed to upgrade the junction of Rathmines Road Upper with Rathmines Road Lower/Rathgar Road through the provision of kerb protection for cyclists. An upgraded public realm will be provided at this junction through the reallocation of road space. The proposal also allows for some increase to footpath widths through Rathmines and the provision of 2m wide cycle tracks in each direction through the village.
- 6.11.10. At Rathgar Village, the carriageway at the adjoining junction is to be rationalised to reduced vehicular space and to provide additional pedestrian and public realm space. The slip lane from Highfield Road will be removed and this will facilitate the provision of an increased public realm amenity space, with hard and soft landscaping along the shop frontages, that will incorporate seating, tree planting and low-level planting to encourage passive amenity. Medians will be introduced and will incorporate low level planting to further reduce the apparent width of the carriageways. Pavement and kerbs will be re-built using high quality materials sympathetic to the form of the surrounding traditional buildings and the character of the village setting. Importantly, the emerging design avoids impacting the boundary of Christ Church and the mature trees within the grounds and the distinctive focal point of the village will be retained as existing.
- 6.11.11. I note that the Grange Road junction is to be rationalised to reduce the overarching vehicular dominance and to provide additional landscape areas that will enhance pedestrian amenity and public realm. Grange Road will be widened further, requiring encroachment into the grounds of Rathfarnham Castle, however, the realigned boundary will facilitate planting street trees in the new footpath to soften and enhance the appearance of the existing roadway and to provide a sense of separation between the pedestrian space and roadway. The existing poor quality boundary wall will be replaced with a new boundary wall finished in roughcast render, which will be more in keeping with the construction of the castle. The impacted

woodland will be replanted with native species and the existing playground will be integrated with the new planting and setback wall alignment.

- 6.11.12. Similarly, the junction at Butterfield Avenue will be rationalised to introduce better pedestrian and cycle facilities with widened footpaths facilitating provision of additional landscaping and tree planting. Rathfarnham Road, either side of the Dodder River, will require encroachment into private front gardens. There will be loss of existing trees and vegetation, both on street and within front garden boundaries, however, the proposals include for reinstatement of garden boundaries and landscaping and the provision of new street trees along the public footpath.
- 6.11.13. At the Junction of Rathfarnham Main Street and Rathfarnham Road it is proposed to retain the existing public plaza, including stone paving, planters, stainless steel bollards. In addition, the existing dropped kerb arrangement will be reinstated in the same location, including the removable bollard. The vehicular access arrangement into the plaza will be reinstated as per the existing condition.
- 6.11.14. Leading into Terenure Village, the roadway will be rationalised to provide continuous pedestrian and cycle facilities with refurbishment and re-building footpaths so as to upgrade the appearance and integrity of the public realm. New tree planting will be incorporated to replace existing trees felled and the overall quality of the public realm will be upgraded as it leads into the village core.
- 6.11.15. The NTAs response submits that given the significant constraints along Templeogue Road, an option consisting of a segregated cycle facility within Bushy Park was considered the Preferred Route Option. In order to minimise impacts on existing mature trees within this location, the width of the proposed cycle and pedestrian facilities was minimised to utilise the existing path through Bushy Park. The provision of segregated pedestrian and cycling facilities in this location is considered preferable to the existing shared surface treatment, in order to provide a legible arrangement for all road users.
- 6.11.16. Segregated cycle track widths and pedestrian paths throughout the Proposed Scheme are generally 2m wide, although at certain locations these widths are proposed to be reduced to account for local constraints. In all instances reductions from the preferred widths are over short distances and are being provided to either tie in with existing adjoining facilities, to reduce land take requirements on private property, minimise impacts on items of heritage interest, or retain existing mature

trees/planting. I note that the reductions can result in the cycle track widths falling to a minimum of 1.2m for certain specific pinch points over short sections and that a minimum of 1.2m (accessibility standard) is maintained for pinch points on footpaths at all locations. Having regard to the context and nature of the Proposed Scheme, I consider these deviations to be acceptable and note that footpaths will continue to meet accessibility standards throughout. DMURS defines the absolute minimum footway width for road sections as 1.8m based on the width required for two wheelchairs to pass each other. At specific pinch points, Building for Everyone: A Universal Design Approach, defines acceptable minimum footpath widths as being 1.2m wide over a 2m length of path. This minimum of 1.2m allows one wheelchair to pass.

6.11.17. On balance, it is clear in my opinion, that the Scheme provides an appropriate balance between meeting the objectives of the Proposed Scheme while minimising the impact on the receiving environment. I highlight that the City Architects Division welcomes in principle the objectives of the scheme to support integrated sustainable transport use through infrastructure improvements for active travel (both walking and cycling), and the provision of enhanced bus priority measures. The Proposed Scheme will facilitate the modal shift from car dependency through the provision of walking, cycle, and bus infrastructure enhancements thereby contributing to an efficient, integrated transport system and facilitating a shift to a low carbon and climate resilient city. I note it is the intention of the NTA to further liaise with the City Architects Department, SDCC public realm section and SDCC Architectural Conservation Officer in relation to the final detailing of new street furniture.

6.11.18. The proposed scheme will result in the provision of new / refurbished pedestrian facilities and footpaths along the scheme and associated ancillary works. The number of pedestrian signal crossings will increase from 76 to 106. The scheme provides for the provision of 32 junction upgrades and provision of 105 new / refurbished raised table side entry facilities. It will provide an average increase in footway area for pedestrians of 25% inbound and 28% outbound. I consider the public realm upgrades, including widened footpaths, high quality hard and soft landscaping contribute towards a safer, more attractive environment for pedestrians. I am satisfied that the scheme has been developed having regard to relevant accessibility guidance and universal design principles so as to provide access for all users.

6.12. Provision for Cyclists

- 6.12.1. At present, 28% of the route has segregated cycle tracks. This will increase to 85.4% with total cycle facilities in both directions increasing from 11 kilometers to 23.3 kilometers (112%).
- 6.12.2. The Traffic Sections of DCC and SDCC are supportive of the integrated sustainable transport proposals and recognise the significant improvements that they will bring in terms of safe cycling measures and in enabling an efficient public transportation service along the route. Both Local Authorities are committed to assisting the NTA and their agents in delivering the proposed scheme within their administrative areas.
- 6.12.3. SDCC Traffic and Transport Section have submitted a detailed assessment of the proposed scheme highlighting areas of concern and support for numerous improvements to cycling infrastructure along the route. I note issues raised for further consideration by SDCC in their initial submission with respect to changes in direction of cycle track around the inbound island bus stop on Templeogue Road, issue of traffic safety at Corrbeg Junction, issue raised of cycle track alignment in the vicinity of Springfield Road Junction, tie in with SDCC Dodder Greenway Cycle scheme. Following the NTA's detailed response to the submission, SDCC submitted an additional submission which clearly states that the SDCC traffic section are satisfied with the responses to all items raised for the first section from the existing Spawell junction to Fortfield Road. With respect to Nutgrove Avenue to Dodder Park Road section, SDCC traffic section are satisfied that sufficient junction modelling analysis has been completed to demonstrate that the proposed changes will work within acceptable junction capacity limits. I highlight that SDCC traffic section are also satisfied that the NTA have demonstrated that the proposed scheme will seamlessly tie into the Dodder Greenway project. South Dublin County Council submit that they would welcome a condition that, should approval be granted, the NTA and their design consultants ensure that communication channels are maintained with SDCC. The NTA have no objection to this request. I note that 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. I consider the NTA's response addresses issues of concern raised with respect to diversions and pinch points in cycle track widths. Cycle track alignment changes are reasonable and valid, aimed at slowing cyclists, in particular cargo bikes. I am also satisfied that the treatment at pinch points is in line with the road user hierarchy as designated within DMURS i.e., the width of the general traffic lanes should reduce first, then the width of the cycle track should be reduced before the width of the pedestrian footpath is reduced.

- 6.12.4. In my opinion, kerb heights along cycle tracks are an important factor for eliminating illegal parking, particularly where a general traffic lane adjoins the cycle track. A low kerb height makes illegal parking or pulling up onto the cycle lane more tempting to motorists. The Preliminary Design Guidance Booklet proposes a kerb height of 60mm between the cycle track and roadway. I consider this to be appropriate.
- 6.12.5. Dublin City Council have also submitted a detailed critique of the cycling infrastructure proposed along the route, road section by road section. The submission makes certain observations and seeks clarification. It highlights that there are recurring situations throughout the scheme where users priority is unclear for example at bus stops and where cycle routes cross footpaths. Grade or physical separation between cycling facilities and footpaths is recommended and running cycle tracks through footpaths and pedestrianized zones should be avoided. Ensuring pedestrian priority is important, particularly, in the context of people with accessibility issues, including visual impairments. It is submitted that trees and heritage features appear, on the drawings, to be shown within footpaths, cycle lanes and loading bays, thereby, causing obstruction and also existing street furniture does not appear to be indicated throughout. The submission indicates that there are numerous occasions where cycle lane width varies, from it is contended c. 1.10m – 1.90m, the cycle lane is notes as narrow in places (e.g. TRN and Rathfarnham Road) and not segregated from the footpath.
- 6.12.6. The NTA acknowledge that due to significant constraints in available width along the route of the Proposed Scheme, that in some locations, cycle facilities of a narrower width than the desirable minimum of 2.0m have been proposed, including on Rathfarnham Road, Rathgar Road, Camden Street Lower and on Templeogue Road. Typical cross-sections are provided within Appendix B4 of the PDR which detail the

proposed cycle track widths. The options selection process which has informed the design of the Proposed Scheme in each location is document in the Preferred Route Options Report, which is included in the Supplementary Information of the submission. Further the NTA defends the approach to the urban tree landscaping strategy. It is submitted that the overarching planting strategy is to retain established trees and vegetation wherever practicable for their arboricultural, amenity and biodiversity value.

- 6.12.7. The planting strategy includes replacement of street trees and groups of trees that may be impacted by the Proposed Scheme, but also the introduction of new tree planting and street trees within other spaces and along streets. Reinforcement of green infrastructure along the route will improve the overall amenity, character and appeal of the route corridor and localities along it, as well as enhancing biodiversity.
- 6.12.8. The significant benefits that urban street trees can provide is noted, not only in relation to urban design but also in terms of supporting biodiversity and urban stormwater management through the provision of SuDS features. It is submitted by the NTA that Figure 4.1 in Section 4.3.1 of the PDR outlines the optimum CBC Infrastructure Works Cross-Section, which includes for street trees within the proposed footpath. While a typical desirable minimum footpath width of 2.0m is desirable, it is noted that Figure 4.2, which is an extract from 'Building for Everyone: A Universal Design Approach', notes that over short distances (<2m) a reduced footpath width of 1.2m is feasible. The example presented in this image is of an urban street tree within the footpath. As such, the provision of street trees within proposed footways is considered feasible and appropriate. I consider this to be appropriate.
- 6.12.9. It is acknowledged by DCC's Traffic Department that the design of this scheme is complex. Considering the constraints at a number of locations, I am satisfied that conflicts raised by DCC between pedestrians and cyclists have been considered, responded to satisfactorily and / or designed in / out of the Proposed Scheme, where appropriate, to the best possible extent. I note that the NTA has no objection to liaising further with DCC with respect to local public realm improvements and agreeing full details of design prior to commencement of development. In this regard I recommend that a condition be attached to any grant of planning permission requiring that, in the interest of pedestrian and cyclist safety, the developer shall agree in writing with the planning authority details of the precise design and layout of

pedestrian crossing facilities over cycle tracks at island bus stops on a case-by-case basis which shall be informed by the Cycle Design Manual (National Transport Authority, September 2023) (see recommended Condition 7)

6.12.10. The Dublin Cycling Campaign supports the proposed scheme, though they do request a few minor modifications. Concerns are raised with respect to cycle track width, universal design and continuity of cycle tracks. It is submitted that cycle tracks proposed to be constructed at less than 2.0m width are not being built for the envisaged future capacity required. The use of filtered permeability on Mountpleasant Avenue Lower and Lennox Street are welcomed, however, the Dublin Cycling Campaign submission notes that further away from the city centre the scheme relies more upon signage and enforcement. It is considered that the bus gate along Rathmines Road Lower is a positive step. Dublin Cycle Campaign suggest that filtered permeability should be utilised more extensively, including at (but not limited to) Rathdown, Wasdale Road, Greenmount Road and Fortfield Road, to negate the possibility of rat-running on these streets. The submission notes that there is an unnecessary left-turn lane from Harcourt Road to Richmond Street South, and that there is a road that acts as a slip lane for the same route immediately east of the junction. The submission suggests that the left turn lane is removed and left turning traffic filter from the straight-ahead lane, and that the slip lane be closed to through traffic. If the slip lane is retained, the submission states that it needs a crossing at the junction with Harcourt Road as this junction is currently taken at high speed by motorists. The submission notes that the proposed conversion of the existing roundabout to a signalised junction is welcomed, however if there are separate cycle/pedestrian crossings the junction waits will be very long. The reduction of the speed limit, at specific locations along the route, to 30 km/h is welcomed. The submission states that Terenure Place presents a hostile environment for vulnerable road users and requests that An Bord Pleanála requires by condition consideration of removal of one of the general traffic lanes.

6.12.11. As illustrated in Appendix 1 numerous submissions have sought detailed design changes to the proposed scheme. As set out in section 4.10 of this report above the NTA has responded in depth to issues raised. The submissions are summarised in detail in Appendix 1 of this report. I note and highlight the detailed and valid nature of the response set out to filtered permeability, achieving national mobility policy targets, universal design, cycle track design, segregation and widths,

quiet street treatments, principles of protected junction design, pedestrian – cyclist conflict, use of traffic signals to yield to cyclists and speed limits.

6.12.12. In respect to one of the detailed concerns raised of an unnecessary left-turn lane from Harcourt Road to Richmond Street South. I note and find wholly reasonable the NTA's response that:

“The left turn lane in this location is provided to allow vehicles to access the existing parking and loading bays on Richmond Street South, which otherwise would be inaccessible. The cross-section of Harcourt Road in this location has been reduced from four general traffic lanes to three, to facilitate the introduction of cycle tracks. The closure of the slip road from Harcourt Road would restrict access to and from properties that are accessed from this narrow, one way street. Consideration may be given to providing a raised entry treatment at this junction at the next design stage”.

6.12.13. I highlight the response and rebuttal to the many detailed design elements of the scheme, by Dublin Cycling Campaign, local businesses and various third parties and residents associations. The NTA recognises the benefit that the continued engagement with the Dublin Cycling Campaign and other advocacy groups, has had in developing the Proposed Scheme. It is notable that the Dublin Cycling Campaign are generally supportive of the Proposed Scheme, apart from certain elements. Requests to modify particular detailed design aspects of the Proposed Scheme are noted. I note the NTA's submission that it looks forward to the continuation of collaboration with the Dublin Cycling Campaign in achieving the Proposed Scheme objectives which have many synergies with the Dublin Cycling Campaign's vision for a vibrant city where people of all ages and abilities can choose to cycle as part of their everyday life.

6.12.14. Where roadway widths cannot facilitate cyclists without significant impact on bus priority, alternative cycle routes are explored for short distances away from the Proposed Scheme route. Such offline options may include directing cyclists along streets with minimal general traffic other than car users who live on the street. They are called Quiet Streets due to the low amount of general traffic and are deemed suitable for cyclists sharing the roadway with the general traffic without the need to construct segregated cycle tracks or painted cycle lanes. The Quiet Street Treatment would involve appropriate advisory signage for both the general road users and cyclists. Wasdale Park has a cross-section of 8.5m. It is noted that this includes for

informal residential parking on either side of the roadway and as such the available carriageway width is approximately 4.5m, which is aligned with the guidance included in the CROW³ manual. The NTA notes the comment in support of the removal of slip lanes for general traffic. Slip lanes for cyclists have not generally been provided as part of the Proposed Scheme, as managing the conflict between cyclists and pedestrians in these locations would be challenging. The provision of protected junctions for cyclists at all junction locations was not considered to be practicable due to the constrained width. It is acknowledged that due to significant constraints in available width along the route of the Proposed Scheme, that in some locations, cycle facilities of a narrower width than the desirable minimum of 2.0m have been proposed. The NTA submit that where cycle track widths have been reduced below the desirable minimum of 2.0m wide, it is due to the significant pedestrian demand on busy commercial street, and to balance the provision of high quality pedestrian and cyclist facilities while maintaining commercial loading and parking where practicable, i.e. Camden Street.

6.12.15. As with any new infrastructure there will be an element of acclimatisation for all users, however, I note that the preferred location for raised adjacent cycle tracks is between the footpath and any proposed parking spaces as this provides additional protection for cyclists and that this is also in line with international best practice. Furthermore, I note that where parking is proposed adjacent to a cycle lane a protection/separation buffer of 0.75m is incorporated (between the car parking area and the cycle track) throughout to avoid conflicts arising. I consider this approach to be acceptable and am satisfied that it provides a safe environment for cyclists as well as those existing/entering parked cars.

6.12.16. Overall, as referred to above I am satisfied that conflicts between pedestrians and cyclists have been designed out of the Proposed Scheme to the best possible extent. Again, I refer the Board to Condition 7 which I recommend is attached to any decision to grant planning permission.

³ CROW Design Manual for Bicycle Traffic is a publication on bicycle transportation planning and engineering in the Netherlands.

6.13. Removal of parking / loading bays

- 6.13.1. A number of submissions raised concerns about the loss of car parking and loading bays within Rathgar Village, Terenure Village, Rathmines and from Richmond Street, Camden Street, Aungier Street and Wexford Street to Dame Street, with the focus of concern being that the loss in car parking will restrict access to certain locations and that this will have an adverse impact on the commercial viability of premises and services. Keith Walsh, Camden Inns Limited has raised concern of removal of a loading bay on the west side of Wexford Street. Philip Elliott, Elliotts Food Service (Montague Street) is concerned of the construction of a new loading bay directly outside The Camden, as it is considered it will detract from the protected structure status. Tesco Ireland Limited welcome the inclusion of the loading bays adjacent to the Camden Street and Aungier Street stores. Rathgar Medical Practice is concerned with respect to loss of access to car parking. No. 80 Earls Court TRE is concerned of loss of car parking spaces. Concern is raised of illegal parking for those accessing and using Bushy Park. It is requested that additional car parking could be provided at Springfield Avenue adjacent to existing car parking area, to alleviate car parking problems in Rathdown. Cllr Carolyn Moore (Green Party) requests that disabled parking and age friendly parking bays should be introduced. Dublin City Council has also raised the extent of loss of loading bays and impact upon local businesses, a condition regarding insurance and agreement that adequate loading bays and parking is provided is recommended.
- 6.13.2. Section 6.4.6.1.1.4 of Chapter 6 of Volume 2 of the EIAR, sets out the potential impacts of the Proposed Scheme on parking and loading provision which has been assessed through a comparison of the availability of spaces or lengths of bays. The proposed changes in parking and loading provision along the Proposed Scheme are summarised in Table 4.22 and Table 4.23 of the Preliminary Design Report submitted in support of the application.
- 6.13.3. The following section denotes sections of the proposed route where changes to parking are proposed:
- Grange Road / Rathfarnham Road (Between Grange Road and Dodder Park Road) - 0 car parking change, 0 loading bay change.

- Rathfarnham Road / Terenure Road East (between Dodder Park Road and Rathgar Avenue) -7 car parking change, 0 loading bay change.
- Rathgar Road (between Rathgar Avenue and Rathmines Road Upper) -3 car parking change, -3 loading bay change.
- Rathmines Road Lower (between Rathmines Road Upper and Grove Road) -4 car parking change, +6 loading bay change.
- Richmond Street South / Camden Street Lower / Wexford Street (between Grove Road and Cuffe Street) -16 car parking change, 0 loading bay change.
- Redmond's Hill / Aungier Street / South Great George's Street (between Cuffe Street and Dame Street) 0 car parking change, -6 loading bay change and
- Terenure Road North / Harold's Cross Road (between Templeogue Road and Parkview Avenue) -24 car parking change, -2 loading bay change.

6.13.4. The proposed scheme will result in an overall loss of 54 parking spaces and five loading bay spaces within the redline boundary of the Proposed Scheme (-7 spaces in Section 2, -32 (including 5 loading bay spaces) in Section 3 and -20 spaces in Section 4). The control and limitation of car parking is a measure that can be successful in encouraging modal shift to sustainable modes. In terms of the impact on commercial accessibility due to the availability of parking on various side streets in the vicinity, this is considered acceptable. The Proposed Scheme will formalise parking arrangements along the route to improve the environment, particularly for pedestrians and cyclists. Whilst total parking provision will be reduced by 54 parking spaces and five loading bays as part of the Proposed Scheme, the majority of these are commercial spaces and have a range of alternative parking spaces within a 200m vicinity/ on side streets.

6.13.5. I highlight that in response to submissions received that on Camden Street Lower, there would be an increase of 1 loading bay as a result of the Proposed Scheme. Further along on Wexford St, there would be a loss of 1 loading bay. In total, there would be no net loss in dedicated loading bays along Camden Street Lower / Wexford Street.

6.13.6. The permanent acquisition at No. 80 TRE Earls Court (Stonepark Investments Ltd) will result in the maximum loss of 3.7m of lands on the eastern end of the property,

which narrows to 0.3m on the western end. An additional 2.0m will be temporarily required at the boundary wall and 1.0m at the driveway to allow for the construction of boundary treatment works and tying into the existing garden/driveway. It is acknowledged that the proposed land acquisition may lead to the loss of one parking space in the front area of the property. However, it is emphasised that the proposed changes will not significantly impact the residents' ability to park generally at the property.

- 6.13.7. It is not proposed to CPO lands either permanently or temporarily at Rathgar Medical Practice and therefore no direct impact upon car parking at Rathgar Medical Practice will arise.
- 6.13.8. With respect to concern of inadequate supply of parking at Bushy Park I note the NTA's response that this is an existing issue experienced in the area related to activity in the park and falls outside the remit of the Proposed Scheme.
- 6.13.9. I highlight that the NTA submits that parking and loading facilities, including disabled parking bays, have been retained in critical areas, such as on in Terenure Village, on Rathmines Road Lower, Camden Street, and on South Great George's Street. It is further noted that increased provision of cycle parking is proposed as part of the Proposed Scheme. A large number of these proposed cycle parking facilities will be located close to urban villages and areas of commercial activity such as in Terenure Village, in Rathmines and on Camden Street.
- 6.13.10. I note that the aim of the Proposed Scheme is to provide enhanced walking, cycling and bus infrastructure. In achieving this aim, the Proposed Scheme has been developed using the PDGB and in accordance with the principles of DMURS and Building for Everyone: A Universal Design Approach (NDA 2020). The assessment of the existing street infrastructure and its ability to support access for disabled users have been based mainly on the Irish Wheelchair Association [IWA] 'Best Practice Guidelines, Designing Accessible Environments' and The National Disability Authority's [NDA] 'Building for Everyone: A Universal Design Approach.
- 6.13.11. The City Architect in DCC requests the NTA engage with electrical charging operators to co-ordinate the roll-out of on-street charging points. However, the NTA are clear in their response to this and state that the Proposed Scheme is intended to provide enhanced facilities for public transport and active travel and that it would not be appropriate in such a scheme to address the issue of on-street electrical charging

facilities at parking spaces which is a separate matter for the local authority and the electrical supply utilities. I agree with the NTA on this issue in that their remit relates to public transport enhancement and not infrastructure for E.V.s.

6.13.12. Given the location of the proposed development within an urban highly accessible area and that spaces are to be lost to facilitate enhanced walking, cycling and bus infrastructure, I am satisfied that the loss of spaces is justified. The Proposed Scheme will also formalise the parking arrangements at these locations to improve the environment, particularly for pedestrians and cyclists. Further to this, the availability of equivalent types of parking along adjacent streets within 200m of these locations (and typically within 100m) will limit the overall impact of this loss of parking. It can be concluded that the significant improvements to walking, cycling and bus facilities encouraging use of sustainable modes will reduce demand for private parking.

6.14. Private Cars / Impact on commercial / Service/ Community Premises.

6.14.1. Submissions have been made raising concerns that the Proposed Scheme will result in adverse impacts on commercial, service and community premises along the route. In this regard I consider that the Proposed Scheme will improve accessibility to commercial and service premises. Car parking (albeit at a reduced level) remains available at suitable locations along the route and significant infrastructure improvements are being brought about to cater for additional access by safe, convenient, and reliable sustainable modes of transport. The Proposed Scheme will render all businesses and services along the route more accessible to those who do not have access to a private car and additional bike stands are also provided throughout.

6.14.2. Some submissions have raised concerns that the Proposed Scheme will have an adverse impact on more vulnerable people in terms of impacting their ability to access medical services (such as pharmacies, doctors, and hospital visits), as such users may not be in a position to take advantage of public transport or cycling and pedestrian infrastructure improvements. Concerns have also been raised in relation to accessible car parking spaces being lost. Submissions and concerns raised by Rathgar Medical Practice, Christchurch Rathgar, Church of Mary Immaculate Refuge

of Sinners, Rathmines Road, St. Mary's R.C. school in Rathmines and Saint Louis High School.

- 6.14.3. It is clear that there will be positive impacts of improved accessibility by pedestrians, cyclists and bus users, and employees to access commercial businesses. The nature of the proposed works means accessibility impacts will differ based on the mode of travel used. The applicant has determined that people movement would significantly increase along the Proposed Scheme as a result of improved footpaths and cycle paths. It is expected that all businesses along the Proposed Scheme will, to some extent, benefit from the increase in passing trade.
- 6.14.4. The NTA have determined that the bus gates are not expected to have a significant impact on private vehicles accessing commercial businesses along these stretches of roads due to the lack of on-street parking provision, however they will impact accessibility in terms of lengthened and re-routed journeys.
- 6.14.5. Overall given the lack of on-street car-parking along the route, esp. in the villages of Rathfarnham, Terenure and Rathmines I consider that impact upon access to commercial, service and community facilities is acceptable and positive.
- 6.14.6. I note that some submissions are in favour of the project and argue that the Proposed Scheme does not go far enough, and that additional one-way systems or limitations should be put in place for general traffic. I also note that all relevant policy documentation advocates for the prioritisation of public transport over the private car as this represents the most sustainable and efficient means of moving people around any urban environment. I consider that the Proposed Scheme, as designed, successfully balances the need to prioritise public transport, cycling and pedestrian infrastructure while also accommodating the private car within the network. I acknowledge that certain inconveniences will arise from the Scheme for the private car in terms of there being less carriageway space devoted/assigned to it, the removal of left turning filter lanes, the reduction in car parking spaces, and restricted turning/access at certain locations. The Proposed Scheme, however, should not be misconstrued as being 'anti-car', as it continues to cater for and accommodate the private car. While car parking will be reduced along the scheme, it is still retained where practicable at suitable locations. Accordingly, while acknowledging that there is a loss of car parking, I do not consider this loss to be of such significance or adverse impact to merit any changes, omission or refusal of the Proposed Scheme

given the overall wider benefits arising in terms of improved bus, walking, and cycling infrastructure in terms of people movement and emissions reductions.

- 6.14.7. I note that DCC Traffic Division, South Dublin County Council Traffic and Transportation section and Dublin Cycling Campaign welcome design interventions such as Bus gates, amendments to the scheme, improved island bus stops, conversion of Spawell roundabout to a signalised junction, introduction of cycle facilities on Terenure Road North and Harold's Cross Road. DCC is supportive of the proposal and recognises the significant improvements in terms of safe cycling measures and in enabling an efficient public transportation service along the route.
- 6.14.8. It is noted that the proposed scheme including right turn bans for private vehicles, the proposed bus gates may result in an inconvenience for those seeking to access businesses, community or residential premises in Rathmines and Terenure by car, vehicular access will be retained via routes from all directions. The bus gate will restrict general traffic movements during the hours of operation of the Bus Gate, only (06:00 – 20:00 - 7 days a week).
- 6.14.9. It is essential on all BusConnects corridors that the bus service is given priority. DCC states that links to bus information in relation to traffic flow management will be upgraded to improve this service and ensure free flow for buses. This digital improvement is necessary to ensure the scheme operates to its full potential. DCC have carried out modelling work to mimic the real-life operation of the project. It is stated that the design of this scheme is difficult and complex and has called for multiple interventions along the road network in order to achieve its objectives. The use of bus priority signals, bus gates and a combination of one-way systems and turn bans are all intended to alter the current traffic situation along the route and ensure that public transport, walking and cycling can be prioritised over the private car. Any "Watering down" of the benefits of the scheme by making localised changes to the design is not recommended.
- 6.14.10. The Transport Impact Assessment appended to the EIAR focuses on the movement of people rather than the movement of vehicles and I have concluded in the EIA that the assessment approach is robust and appropriate for modelling the future impacts of the Proposed Scheme. I consider that the information presented in the EIAR, and associated appendices gives a good representation of existing and

future people movement scenarios along the corridor for the opening year and into the future.

6.14.11. In general, in a 'Do Nothing' scenario the streetscape would continue to be based around the movement and parking requirements of private cars instead of people. I consider that the impacts on private car users have been kept to a minimum and this is perhaps indicative of the time when the Proposed Scheme was designed. Notwithstanding, I do not consider that the lack of curtailment of the private car in no way represents grounds for refusing the Proposed Scheme. I consider that the proposed bus, cycle and pedestrian infrastructure will be of a quality to encourage a modal shift away from the private car and this should satisfy what is essentially the main objective of the BusConnects programme. Given the urgency of climate change, I consider that the Proposed Scheme as presented will go a long way towards the promotion of compact growth and sustainable movement.

6.15. Built Heritage/Cultural Heritage/Architectural Heritage.

6.15.1. An overview of the proposed scheme is set out in section 3.0 of this report above and I do not intend to repeat the description. The local policy context in relation to natural, cultural and built heritage for both South Dublin County Council and Dublin City Council is set out in Section 5.23 and 5.24 above. Several submissions have raised concerns in relation to the potential adverse impact that the Proposed Scheme could have on various elements of the built heritage/cultural heritage and architectural heritage. Several concerns are raised with respect to impact on properties along Terenure Road East and impact upon Rathfarnham Castle Park. Submissions reference the impact on properties, and in particular the relocation of boundary walls/railings along Terenure Road East and state that the Proposed Scheme will have a significant impact on the curtilages of protected structures and the character of the street. Submissions also contend that the replacement wall proposed along the Rathfarnham Castle Park boundary will be of inferior quality to the existing wall.

6.15.2. As already set out, the proposed scheme passes through South Great Georges Street ACA, Grand Canal CA, Richmond Street to Aungier St CA, and Dame St CA. There are 13 Industrial Heritage sites identified in the study area. Four of these are Protected Structures. These include Pearse Bridge (RMP DU022044002, DCIHR 220700201) and St. Pancras works {DCC RPS 5686, DCIHR 220303501), Grand

Canal House (DCC RPS 8721, DCIHR 181504001), South City Markets (DCC RPS 3214 to 3223, DCIHR 181116601). A further two were also identified in the NIAH building inventory. None of which are affected. The Circular Line of the Grand Canal itself has not been assessed by NIAH, but its features such as La Touche Bridge (NIAH 50110273), Canal Locks {NIAH 50110274} and Grand Canal Dock {NIAH 50020499} are rated as being of Regional Importance by the NIAH. There are a number of Protected Structures distributed along the corridor, including Templeogue Graveyard and Church (Ruin), a Templeogue Stone Arch, and Cheeverstown House, The Yellow House, Rathfarnham Castle and Pearse Bridge over the River Dodder. There are a significant number of Protected Structures along Terenure Road East, Rathgar Road, Rathmines Road, Richmond Hill South, Camden Street, Aungier Street and South Great George's Street. Policies in relation to archaeological and architectural heritage, including definitions of heritage features e.g., protected structures, as they relate to the Proposed Scheme are discussed in greater detail in Chapter 15 (Archaeological & Cultural Heritage) and Chapter 16 (Architectural Heritage) respectively of this EIAR.

- 6.15.3. Three locations were identified where the Proposed Scheme will directly impact on the boundaries of Protected Structures during the Construction Phase. These include the boundaries to 74, 76 and 78 Terenure Road East (DCC RPS 8118, 8119, 8121), 59 to 69 Terenure Road East (DCC RPS 8106, 8107, 8109, 8111, 8113, 8116) and 50 to 62 Terenure Road East (DCC RPS 8097, 8099, 8101, 8103, 8105, 8108).
- 6.15.4. I note that land take at Terenure Road East will result in the removal of the boundary treatments incl. mature trees, a cement rendered wall with dressed granite capping, entrance piers and railings to Protected Structures. It is evident that the works will impact upon heritage structures along TRE incl. boundaries, trees, cast iron pillar style post boxes, a vent pipe and a mile stone.
- 6.15.5. The boundaries are to be repositioned to facilitate the proposed bus and cycle lanes. The proposed mitigation is the recording of the existing boundaries and heritage structures in position prior to the works, labelling the affected masonry, brickwork, railings, gates, gate posts, capping stones prior to their careful removal to safe storage, and their reinstatement on new lines, which 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 the labelling,

taking-down and reinstatement of the affected gates, railings, piers, bricks and masonry. Works to historic fabric will be carried out in accordance with the works methodology set out in the EIAR.

- 6.15.6. Overall, it is my considered assessment a balance needs to be struck between road widening, tree loss and boundary encroachment. I acknowledge road widening into properties on the northern side of TRE west of Heathfield and to the south of TRE east of Greenmount Road. Having considered the NTA's detailed response to the objectors concerns I am of the opinion that a thorough study of the receiving environment has been carried out. As noted by the Conservation Department of DCC a comprehensive assessment on architectural heritage, streetscape and the urban environment has been carried out and submitted as part of the EIAR and the proposed mitigation measures across the scheme, including setting back the existing boundary walls where required on a like for like basis, is generally acceptable.
- 6.15.7. I note the proposed mitigation i.e. the recording of the existing boundaries in position prior to the works, labelling the affected masonry, brickwork, railings, gates, gate posts, capping stones prior to their careful removal to safe storage, and their reinstatement on new lines, which 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 the labelling, taking-down and reinstatement of the affected gates, railings, piers, bricks and masonry. 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.
- 6.15.8. Overall, there would be a relatively small loss of private / garden area which will result in a partial loss of landscape amenity space, but there would be no notable change to the key characteristics of these properties. I am satisfied based on the nature of the proposed works that there will be no discernible impact to the visual amenities or setting of these protected structures or the wider area at this location.
- 6.15.9. The removal and setting back of boundaries along the route will not alter the overall character of the area or the overall appearance of any of the existing dwellings to such a degree as to warrant a refusal of the proposed scheme. Specific regard is had to

Policy BHA2 of the DCDP which relates to impact upon protected structures and their curtilages.

- 6.15.10. Indirect Construction Phase impacts are anticipated where there is potential for damage to the designed landscapes, and where an adverse visual impact is anticipated during construction. Six designed landscapes of medium sensitivity were identified in the study area where there is potential for damage during the construction phase, these include the Demesne wall (CBC1012BTH389) to Beaufort House/ Loreto House, Grange Road (NIAH 2350), Cremorne 69 Terenure Road East (DCC RPS 8116, CBC1012BTH147), Spawell House (SDCC RPS 260), Cheeverstown House (SDCC RPS 242), Templeogue House (NIAH 2313), and Terenure House (NIAH 2332). They are listed in Section 16.3.1.6 and described in Appendix A16.2 Inventory of Architectural Heritage Sites in Volume 4 of the EIAR.
- 6.15.11. Land take will directly impact on vent pipes, cast iron pillar style post boxes necessitating temporary removal / relocation. All post boxes will be reinstated. The potential for loss or damage to post boxes, vents, mile stones and coal holes during removal, transportation, storage, and reinstatement is noted, but considered necessary and acceptable.
- 6.15.12. I note the DCC Conservation section report also points out that there is a potential for indirect physical impact to high sensitivity nationally important protected structures. Such as 21 Aungier Street (RMP DU018-020184), 20 Aungier Street (RMP DU018-386), 10 and 10a Aungier Street (RMP DU018-385), 9 and 9a Aungier Street (RMP DU018-384). It is also outlined that there is the potential for damage during construction to the South City Markets (DCC RPS 3214 to 3223).
- 6.15.13. The DCC Conservation section also notes that the proposed kerb realignments at 48 Harrington Street & 12 Camden Street Upper, 61 - 73 Camden Street Lower, 83-87 Camden Street Lower and on the east side of Redmond's Hill will directly impact granite kerbs on the west sides of Camden Street Upper (CBC1012BTH249), and Camden Street Lower (CBC1012BTH256) and on the east side of Redmond's Hill (CBC1012BTH332). The removal of the kerbs will carry the potential risk of loss or damage.
- 6.15.14. I note once again the proposed mitigation i.e. the recording, protection and monitoring of features such as boundaries and entrance features prior to, and for the duration of the Construction Phase. The architectural heritage specialist will oversee

the labelling, taking-down and reinstatement of the affected gates, railings, piers, bricks and masonry. 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 the EIAR.

- 6.15.15. A submission raised concern that the Proposed Scheme will impact the Memorial Hall and Pearse Bridge in the context of heritage streetscape, noting that the project will reduce the frontage of the memorial hall. The NTA have responded that there is no land acquisition proposed at either of those locations. This is noted.
- 6.15.16. I note that bus shelters are proposed to be erected at four protected structures. Shelters are proposed at 12 Terenure Road East (DCC RPS 8063); 78 Rathgar Road (DCC RPS 7072); 153 Rathgar Road (DCC RPS 7120); and 46 Rathgar Road (DCC RPS 7046).
- 6.15.17. All four buildings are Protected Structures of Regional importance and of Medium sensitivity. The NTA submit that the magnitude of impact of the Bus shelters will be low as in each case the Protected Structures are set back from the road behind existing, or in the case of 78 Rathgar Road (DCC RPS 7072) a reinstated boundary treatment, limiting the visual impact of the proposed bus shelters. Having carried out a site visit, taking the photomontages into account and the detailed general arrangement drawings and plans submitted I consider that the Proposed Development, its associated planting, and bus shelters can be accommodated without adverse visual or heritage impacts. However, in order to do so and minimise impacts in so far as is practicable, I consider it appropriate to omit advertising panels from bus shelters in ACA's, namely South Great Georges Street ACA and Rathfarnham ACA. In this regard I recommend that should permission be forthcoming from the Board that condition No. 21 be attached to any grant of planning permission.
- 6.15.18. The existing boundary wall at Rathfarnham Castle is approximately 380m in length and will be demolished. A new boundary wall will be constructed over the same length along the Proposed Scheme boundary line. The new boundary wall will be circa 2.5m to 2.8m high with round capping rough cast render and will be reinstated like for like as discussed in Chapter 16 (Architectural Heritage). A short

20m section of low wall and railing will be constructed along the new set-back entrance point to the castle grounds. As part of the process of forming the new boundary, a number of trees directly impacted by the works will be removed. All works, both permanent and temporary within the boundary of the castle, will be archaeologically investigated and monitored.

- 6.15.19. The applicant has responded to the submissions of concern stating that the present boundary to Rathfarnham Castle on Grange Road and Rathfarnham Road are replacement boundaries built as part of the Rathfarnham Road bypass. The existing mix of boundary treatments on the Grange Road and Rathfarnham Road provides a poor and discordant street frontage and detracts from the streetscape, particularly in relation to the adjoining ACA and Protected Structures. The concrete block walling also detracts significantly from the Castle and its setting and is out of keeping with the Castle and its Demesne.
- 6.15.20. I note that consultations have been undertaken with SDCC, OPW, Dept. of Housing, Local Government and Heritage regarding the encroachment into the Rathfarnham Castle Demesne and the removal, set back and replacement of the existing boundary wall. No objection has been raised by SDCC to the approach proposed for the Rathfarnham Castle wall replacement. Communication and consultation with SDCC Architectural Conservation Officer prior to commencement are recommended in association with detailed construction management plans (CMP's), safety and method statements. I note that the SDCC submission notes the comprehensive review of Protected Structures and ACA's and Architectural features / Items located within the vicinity of the proposed route. There is potential for damage during the construction phase, however, as highlighted above, 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 the EIAR. This will reduce the magnitude of the risk and ensures safeguarding and best conservation practices.
- 6.15.21. The proposed replacement boundary wall to Rathfarnham Castle will be 2.8m in height of roughcast render, with a rounded capping detail. This it is submitted is consistent with the existing wall and together with the proposed landscape treatment will provide a buffer between the proposed scheme and the Castle and its Demesne and maintains and enhances the sense of enclosure.

- 6.15.22. I agree that the height of the wall is appropriate. The NTA surmise it will represent a neutral change when compared to the overall inharmonious boundary treatment which varies in quality and condition of materials used, I am of the opinion that a stone wall, reflecting the type of stone used in the vicinity (e.g. similar to the stone used at Rathfarnham Castle Courtyard Buildings), would better reflect the current context of the castle and the grounds. However, I note that the design for the reinstated boundary wall, as per the photomontages submitted, is considered an improvement allowing better consistency within the ACA and a boundary treatment that reflects the original type, all of which has been discussed and agreed with the OPW, DHLGH and Conservation Architect consultants for the NTA. The SCDD submission confirms this. I note that there will be provision of substantial new tree planting within the castle demesne to consolidate the new edge to the woodland group and ensure the amenity of the open space is restored.
- 6.15.23. I highlight the submission by the Department of Housing, Local Government and Heritage – DAU. It is their opinion that due to proximity of the scheme to Rathfarnham Castle (RMP DU022-014; NM628; PO2/1986) which is a National Monument in state ownership and subject to statutory protection, all works associated with the proposed scheme at the boundary of the NM will require Ministerial consent under section 14 of the National Monuments (Amendment) Act 1930 – 2014. This is noted.
- 6.15.24. Overall, I highlight that the Proposed Scheme predominantly refers to works along and within an existing transport corridor and as such the majority of works will occur at street level to the carriageways and footpaths, with the notable exceptions of boundary treatment setbacks, signage provision, and bus shelters.
- 6.15.25. In general, I do not consider that the Proposed Scheme will give rise to significant adverse impacts on items of architectural heritage, the works being carried out to carriageways and at street level will not in my opinion impact the character of any of the areas through which the route extends as the nature of the route will remain consistent with that currently in place, i.e. it will remain a significant transport corridor which will facilitate vehicular, pedestrian and cyclist movements. I do note that the Proposed Scheme runs through areas that have significant heritage value in and of themselves and passes by or near structures and buildings that are of architectural or heritage merit.

6.15.26. For clarity, in relation to potential impacts on the built environment, I consider that the design of the Proposed Scheme has given adequate consideration to all elements of heritage value throughout the design process. I consider that the need for cantilevered signage is appropriate as proposed and that it will not detract from the heritage value of structures or features in the vicinity or the wider streetscape. I am satisfied that the approach set out in the application documentation in relation to the treatment, preservation and reuse of heritage features (including heritage lampposts, post boxes, coal hole covers, jostle stones, cobbles, granite kerbing etc.) throughout the Proposed Scheme (as set out in the EIAR and shown on the landscaping general arrangement drawings) is appropriate.

6.15.27. I note in relation to the carrying out of works to and in the vicinity of heritage features that both SDCC and DCC generally consider that the mitigation and methodologies set out within the EIAR to be appropriate, however, it is requested that a condition be imposed requiring engagement and agreement with the local authority on the final works methodologies at the detailed design stage, the Applicant has stated that the inclusion of a specific condition is not required in this regard as liaison will occur as a matter of course. Having regard to the nature and scale of the project, and the fact that the Local Authorities have specialist conservation and architectural sections with widespread and detailed local expertise and considering their development management and planning functions, I consider it appropriate that a condition be applied in relation to heritage features and works which will directly affect them in order to ensure the efficacy of the recording, preservation, protection, and reuse methodologies. In this regard I recommended that, in the interest of environmental protection, the following five no. conditions with respect to archaeology are attached to any grant of planning permission:

- Mitigation measures to be carried out as set out in the EIAR
- A detailed CEMP is required for formal agreement and approval.
- Project Archaeologist to be appointed.
- Ministerial consent for all works at or in the immediate proximity to Rathfarnham Castle
- Archaeological monitoring and any investigation work / excavation required.

6.16. Visual Impact/Townscape

- 6.16.1. The Proposed Scheme has been subject to an iterative design development process, which I note, has sought insofar as practicable to avoid or reduce negative impacts, including townscape and visual impacts. Nevertheless, the Proposed Scheme will give rise to some degree of townscape and visual effect, most notably during the Construction Phase. These impacts arise especially where there is temporary and / or permanent acquisition of lands associated with residential or other properties including amenities, and where tree removal is required. The Proposed Scheme includes for replacement of disturbed boundaries, reinstatement of the Construction Compounds, return of temporary acquisition areas, and for additional tree and other planting where possible along the Proposed Scheme.
- 6.16.2. The documents submitted supporting the application notes that in the Operational Phase localised residual effects will remain for properties, including protected structures, experiencing permanent land acquisition. It is contended that there will be overall positive effects for all sections of the scheme, excluding Nutgrove to Terenure Road North, which will have a neutral effect. I note that the Proposed Scheme provides for improvements in the urban realm, which will provide positive long-term effects for the townscape and visual character, most notably at the centres of Rathgar and Rathmines and along the route from Grand Canal to Dame Street. The restoration and reincorporation of Templeogue Arch into the streetscape will also be a notable improvement.
- 6.16.3. I highlight that SDCC Public Realm Section have employed the services of an Arborist to investigate their concerns of the impacts of the scheme on the existing trees within Rathfarnham Castle Park. See last submission in Appendix 1 Attached to this report for summary of SDCC Consultants Arborist Report. The Arborist report sets out that there is a high probability that the impact from the proposed works will be higher than that indicated and that more trees will need to be removed to facilitate the proposed works than shown and that the visual impact on the area will be greater when one considers all the understory and smaller trees that will be removed to facilitate the proposed works.
- 6.16.4. The Consultants Arborist report advises that the retention of trees shown to be retained at this stage will not be feasible at construction stage. The report concludes in order to assess the full implications of the proposed works on the woodland block

within 'Rathfarnham Castle Park', the tree survey needs to be reviewed to include all trees within influence, the topographical survey needs updating to ensure trees are accurately positioned and the arboricultural impact assessment needs to have a realistic review of the proposed works on the trees to be retained, including the review of all levels.

- 6.16.5. I acknowledge that there are uncertainties within the scheme and while the approach put forward to construct the scheme is acceptable in principle, it is likely that the impact on the tree vegetation in Rathfarnham Castle Park may be greater than shown in some instances. I highlight that it is submitted by the applicant that trees and vegetation to be retained within and adjoining the works area will be protected in accordance with the British Standard Institution (BSI) British Standard (BS) 5837:2012. Works required within the root protection area (RPA) of trees to be retained will follow a project-specific arboricultural methodology for such works, which will be prepared by a professional qualified arborist. For details of trees to be retained at Rathfarnham Castle Park refer to Tree Protection Plans specifically A17.1 Drg. BCIDC-ARP-ENV_LA1012_XX_00-DR-ES-0002 in the Arboricultural Impact Assessment.
- 6.16.6. I consider that subject to a condition being attached with respect to an appropriately qualified arboriculturist and landscape architect being employed for the full duration of the proposed works to ensure landscaping and tree works are implemented appropriately, that the proposed scheme is acceptable. Tree protection measures shall be put in place prior to the commencement of development. All details of soft landscaping should be submitted to and agreed with the planning authority prior to commencement of works. I recommend that subject to suitable conditions being attached to any grant of permission, requiring protection and replacement of trees, the subject proposal is acceptable. Tree loss is unavoidable and will be suitably mitigated.
- 6.16.7. I note the comments by DCC with respect to Bushy Park and Rathdown Drive. Concern is raised to the proposal to provide a segregated cycle track and footpath within Bushy Park, on the route of the existing shared path. The parks department raises concerns about the potential for impact on existing trees within the park and also raises concerns about potential conflicts between cyclists and pedestrians. Concern is also raised about the proposed bound gravel path within the green area

adjacent to Rathdown Park, and the potential impact on tree roots due to the construction of this path.

- 6.16.8. I note the NTA response which states that Section 3.3.2.1.2 of Chapter 3 of the EIAR, Consideration of Reasonable Alternatives, documents the options assessment process carried out for this section of the Proposed Scheme. Given the significant constraints along Templeogue Road, an option consisting of a segregated cycle facility within Bushy Park was considered the Preferred Route Option. In order to minimise impacts on existing mature trees within this location, the width of the proposed cycle and pedestrian facilities was minimised to utilise the existing path through Bushy Park.
- 6.16.9. It is submitted that there will be 169 individual trees removed as a result of the Proposed Scheme. The Preliminary Design Report in the Supplementary Information notes that there will be 400 new trees planted, resulting in an overall net increase of 231 trees as a result of the Proposed Scheme. Within the SDCC area a total of 114 trees are proposed to be removed with 326 new trees proposed to be planted. This equates to a net increase of 212 trees.
- 6.16.10. I am of the opinion that removal of trees needs to be balanced against an enhanced level of service for public transport and for pedestrian / cycle connectivity. I am satisfied based on the information submitted that loss of trees and vegetation have been adequately considered and can be mitigated and protected by way of condition and compliance. I highlight that there will be provision of substantial new tree planting within the castle demesne to consolidate the new edge to the woodland group and ensure the amenity of the open space is restored. There will also be substantial replacement and additional street tree planting throughout this section, including medians, footpaths and roadside spaces. In the original SDCC submission, the Council's Architectural Conservation Officer provided a very detailed report in relation to this specific item and provided feedback and comments throughout the consultation stage. As already referred to above, the design for the reinstated boundary wall is considered an improvement allowing better consistency within the ACA and a boundary treatment that reflects the original type, all of which had been discussed and agreed with the undersigned, OPW, DHLGH and Conservation Architect consultants for the NTA.

- 6.16.11. Numerous enhancements are being undertaken across various destinations within the Proposed Scheme, including Rathfarnham, Terenure, and Rathgar. The primary objective of these improvements to the urban environment is to establish inviting and welcoming public spaces where individuals can convene and engage socially. These improvements involve the strategic reallocation of road space, wherever feasible, from vehicular use to pedestrian and cyclist-friendly areas.
- 6.16.12. As outlined above the proposed scheme is effectively the reallocation of road space with dedicated bus lanes and segregated cycle lanes for the full length. Works will include public realm upgrades in relation to footpath surface and alignment, supplementary planting and the realignment of and planting of central reservation areas along the route.
- 6.16.13. Upgraded junctions will provide for legible crossings for all modes and will be softened at all corners by the planting of trees, wild flowers or various grasses. The design of the overall scheme will provide a palate of consistent materials and finishes and a flow of green space along the full length of the route.
- 6.16.14. Currently, the route contains pockets of green spaces and large sections of the central reservations are planted, however the overall landscape, particularly at junctions is dominated by hard landscaping and results in an uninviting harsh street appearance. I draw the Board's attention to Volume 3 – Figures of the EIAR in which the Landscaping general arrangement drawings are contained. Proposed landscaping along the route is clearly shown on these maps as are the trees etc to be removed.
- 6.16.15. I note the Photomontages submitted in support of the proposed scheme. The proposed views are shown with proposed planting at approximately 10 to 15 years post-completion of the Construction Phase. The Photomontages have been prepared in accordance with the methodology set out in Section 17.2.4.7 of the EIAR and are included in Figure A17.2 in Volume 3 of the EIAR.
- 6.16.16. Having regard to the plans and photomontages submitted, I am, in the main, satisfied that the proposal will have a positive impact on the landscape and to people's experience of the street. The softening of landscaping enhances the pedestrian and cyclist experience and has a positive impact on the perception of an area overall.

- 6.16.17. In relation to the visual impact and setting of Protected Structures and other historical structures, including street furniture, lamp stands and post boxes etc. and ACAs, such matters have been examined within the Cultural Heritage Section of the EIAR below and this section should therefore be read in conjunction with the relevant sections of the EIAR.
- 6.16.18. Overall, there would be a relatively small loss of public lands and private / garden area which will result in a partial loss of landscape amenity space, but there would be no material substantial diminution to the key characteristics of the streetscape or properties. I am satisfied based on the nature of the proposed works that there will be no discernible impact to the visual amenities or setting of these protected structures or the wider area at this location, provided formal agreement and approval with SDCC & DCC architectural conservation officer is sought and agreed prior to commencement of works.
- 6.16.19. The removal and setting back of boundaries along the route will not alter the overall character of the area or the overall appearance of any of the properties to such a degree as to warrant a refusal of the proposed scheme. I recommend that conditions be attached regarding tree protection measures for all existing trees and that prior to the replacement of trees, hedging and planting which is to be removed the NTA shall liaise with the relevant landowner with regard to the species, size and location of all replacement vegetation. The NTA shall also employ the services of an appropriately qualified arboriculturist and Landscape Architect for the full duration of the proposed works to ensure landscaping and tree works are implemented appropriately.
- 6.16.20. I note both SDCC's and DCC's submission in relation to more green infrastructure along the route. Overall, I am satisfied that the proposed development will make a positive contribution to the visual amenity of the area, whilst there will be some noticeable changes for individual properties along the route the overall scheme will provide a much-improved environment for residents, pedestrians, cyclist and motorists traversing and living in the area.

6.17. Biodiversity

- 6.17.1. A number of the submissions raised concern about biodiversity impact. As is evident from the preceding sections of this report, there is much cross over in terms of issues

raised in submissions received. I endeavour, in this planning assessment to address specific issues raised, I highlight I do not intend to reiterate assessment of issues already covered above.

- 6.17.2. Trees and vegetation to be removed are described in the Arboricultural Impact Assessment which is included within Volume 4 (Part 4 of 4) of the EIAR. The impact assessment on the flora and fauna is described in Chapter 12 Biodiversity in Volume 2 of the EIAR. The woodland on the Rathfarnham Castle grounds are designated (in the EIAR) as a WD1 woodland which is a mixed Broadleaf woodland. "Tree species recorded at these locations include maple species *Acer* sp., birch species *Betula* spp., alder, horse chestnut *Aesculus hippocastanum*, hazel *Corylus avellana*, hawthorn *Crataegus monogyna*, cypress species *Cupressus* spp., beech, copper beech *Fagus sylvatica* f. *purpurea*, ash *Fraxinus excelsior*, holly *Ilex aquifolium*, mallow *Malva sylvestris*, sycamore, aspen *Populus tremula*, cherry laurel, holm oak *Quercus ilex*, oak species *Quercus* spp., willow species *Salix* spp., Wilson's honeysuckle *Lonicera nitida*, elder, rowan *Sorbus aucuparia*, small leaved lime *Tilia cordata*, elm species *Ulmus* spp., and cotoneaster species". WD1 woodland is described as being locally important.
- 6.17.3. The EIAR indicates that a number of habitat types considered to be of Local Importance (Higher Value) will be lost as a result of the Proposed Scheme. These include relatively small areas of (mixed) broadleaved woodland (WD1), scattered trees and parkland (WD5), hedgerow (WL1), and treeline (WL2) habitats. The overall total areas of the habitat types which overlaps with the Proposed Scheme boundary and be directly lost as a result of the construction of the Proposed Scheme is provided in Table 12.14 of the EIAR. It is noted that the extent of tree loss is calculated across the length of the Proposed Scheme and is captured under treelines (WL2) as the majority of habitat loss affects this habitat type. However small numbers of these trees may be lost from the habitat classification (mixed) broadleaved woodland (WD1). This distinction is considered in the habitat loss impact assessment. The permanent loss of such habitat types which are considered to be of Local Importance (Higher Value) has the potential to affect the conservation status of each of these habitat types and, therefore, result in a significant negative effect at the local geographic scale.
- 6.17.4. It is submitted in the EIAR that where practicable, areas of vegetation including habitats of Local Importance (Higher Value), (i.e. mixed broadleaved woodland

(WD1), scattered trees and parkland (WD5), hedgerow (WL1) and treeline (WL2) habitat types), which lie within the footprint, or along the boundary of the Proposed Scheme, will be retained. Vegetation to be retained is shown in detail on the Landscape General Arrangement Drawings [BCIDC-ARP-ENV_LA1012_XX_00-DR-LL-9001] in Volume 3 of the EIAR. Proposed planting shown as design mitigation on the Landscaping General Arrangement drawings [BCIDC-ARP-ENV_LA1012_XX_00-DR-LL-9001] will be implemented by the appointed contractor. These areas will be protected for the duration of construction works and fenced off at an appropriate distance.

- 400 trees planted
- 126.4m of proposed hedgerow
- 7,300 m² of proposed species rich grassland
- 932 m² of proposed ornamental planting; and
- 9,212 m² of proposed amenity grassland planting.

6.17.5. The NTA submit that the mitigation strategy (Chapter 12 Biodiversity at Section 12.5) includes mitigation for both construction and operation, as necessary, in respect of protected species confirmed present or on a precautionary basis likely to occur based on desktop data search and professional judgement - Birds, Bats and other mammals as well as habitat replacement and – through the landscaping design (Section 12.5.1.2). The mitigation measures, which will be implemented on the Proposed Scheme will mitigate impacts on breeding birds, bats etc. to levels that are not significant at any geographic scale and that the flexibility provided in the mitigation measures in terms of timing of removal of vegetation are appropriate given the nature of most of the vegetation within the Proposed Scheme boundary –which comprises a narrow, albeit substantial band of wooded vegetation of early mature and mature tree with some and mixed scrub understorey as well as a limited area of open grassland alongside the existing Rathfarnham Castle Park boundary wall. It is contended that, there are no significant residual effects on protected species following adoption of the mitigation measures prescribed.

6.17.6. I note that the protection of water quality is an integral element of the mitigation strategy across all Key Ecological Receptors (KERs) and across the entirety of the proposed scheme and further afield as documented in Chapter 12 Biodiversity for

both construction and operation e.g., Protection of European sites (Sections 12.5.1.1.1 / 12.5.2.1.1) and , Habitats (Section 12.5.1.2 & 12.5.2.2), Protected species (Section, 12.5.1.3 & 12.5.2.3), fisheries (Section 12.5.1.8 & 12.5.2.8) and distal marine mammals (Section 12.5.1.4.4 & 12.5.2.4.4), as well as the mitigation measures provided for in Chapter 13 Water, (see Section 13.5). In terms of significance with respect to Bats, the tree losses which are along the edge of an artificially lit roadway are not considered significant in terms of potential commuting//foraging territory except at a local scale. The loss of the linear strip of woodland habitat along a boundary of the Rathfarnham Castle Park is locally significant in terms of impacts to wildlife. However, it is argued that the loss represents a narrow edge effect adjacent to the busy road, and that the bulk of the woodland and understorey vegetation inside the Rathfarnham Castle Park is being retained. Mitigation has been prescribed for breeding birds (Section 12.5.1.5), preconstruction surveys for mammals – badger, bats, roost confirmation and or usage (Section 12.5.1.4), provision of Bat boxes, no vegetation clearance during the bird nesting season (Section 12.5.1.5.1) and good site practices in demarcating the works area, as are prescribed in the CEMP Appendix A5.1.

6.17.7. In respect of otter, surveys were undertaken at all watercourses intersected by the Proposed Scheme, particularly given the well documented importance of the River Dodder and the Owendoher River (see Section 12.3.8.3 of the EIAR Chapter 12 Biodiversity). This included, as where necessary, additional instream surveys by surveyors undertaking the aquatic surveys. As earlier design iterations of the Proposed Scheme included direct impacts on the Owendoher River, with known otter activity, licenced trail camera monitoring of the holt was undertaken. A site visit on October 4th 2023 found no evidence of otter activity at this holt, which is outside the Proposed Scheme Boundary. The NTA acknowledges that holts can be seasonally / temporarily abandoned (NRA 20063, NPWS 20094) and as such could be utilised at the time of construction. I consider this eventuality is fully accounted for in the assessment and mitigation strategy presented in the Biodiversity Chapter and AA. Further investigation of the above ground millrace and its connectivity from the Whitechurch Stream and later discharge into the Owendoher River, was undertaken in October 2023 upstream of the previously identified holt location (which is described in Section 12.3.8.3 of the EIAR Chapter 12 Biodiversity). There was no evidence of otter activity nor usage within the aboveground section of the mill race

within Rathfarnham Castle Park nor evidence of suitable habitation features in accessible areas around the pond nor aquatic prey other than small fish – three spined stickleback. It is submitted that there is little suitable habitat for otter to inhabit, and to access Rathfarnham Castle Park would involve a significant passage through a narrow culvert that spans a considerable distance from the potential nearest aboveground watercourse. The NRA Guidance notes that extensive culverts such as the mill race that enters Rathfarnham Castle Park are avoided by otter (NRA 2006). The culverted length on the millrace along the indicative direction, illustrated in the Rathfarnham Wood Residents Association submission is approximately 475m (as the crow flies), between its indicative diversion from the Whitechurch Stream and the ingress into Rathfarnham Castle Park. Similarly, the millrace egress culvert extends more than 145m underground from the egress point in Rathfarnham Castle Park before discharging to the Owendoher River. The likely discharge pipe is situated approximately 1- 1.5m above the opt of the watercourse and is a narrow pipe whose dimensions are not suitable for otter passage. Given this, I agree that otter have no practical way of arriving in Rathfarnham Castle Park nor adequate accessible territory with which to roam.

6.17.8. The approach to wintering birds was based on sites intersected by the Proposed Scheme coupled with a published analysis of known ex -situ wintering bird sites (Section 12.2.3.8 of Chapter 12 Biodiversity and Figure 12.1.1 of Volume 3 of the EIAR). Rathfarnham Castle Park has not previously been identified as an ex-situ site for Special Conservation Interest wintering birds, but does nonetheless support wintering birds such as ducks, moorhens and some SCI gulls. While the Proposed Scheme will remove a narrow section along the boundary of the RCP, the majority is comprised of wooded vegetation which is not ordinarily utilised by wintering birds, as it prevents easy take off in case of disturbance/predation. Ideally wintering birds like large open spaces such as the central parts of RCP, which are not being directly impacted by the Proposed Scheme.

6.17.9. The surveys for bat activity focused on accessible areas where likely bat potential could occur. An activity transect was conducted along the Rathfarnham Road which captures the edge of Rathfarnham Castle Park. As is noted in the Biodiversity chapter of the EIAR, that no bat roosts were confirmed within the Proposed Scheme boundary. There were 9 no. trees identified with potential roost features (PRFs) of

which four number trees were identified to be removed. However, Chapter 12 (Section 12.5.1.4.1 sets out appropriate mitigation to address if:

- A roost is present and or used in advance of the construction phase.
- There is adjacent bat activity identified.

6.17.10. I refer the Board to Section 8.0 EIAR assessment in this report, where a detailed assessment of biodiversity is set out.

6.17.11. The proposed scheme will have no direct impact on the pond within Rathfarnham Castle Park. The typical birds noted from within Rathfarnham Castle Park are considered habituated to disturbance given the volume of users of the urbanised park and a relative lack of similar territories across the wider area, e.g. Bushy Park ponds, River Dodder. The majority of the birds are largely associated with the pond, although they utilise adjacent areas including the open grassland in the centre of Rathfarnham Castle Park. These open areas afford some protection, where direct predation is less likely, or disturbance posed by existing parks users and/or predators is less likely. While some of the parks birds can roam within the Rathfarnham Castle Park woodland alongside the Rathfarnham Road boundary, given the volume of pedestrian traffic already traversing and/or using the play area, it affords relatively poor undisturbed habitat, unlike the presence of isolated islands in the pond. Notwithstanding this fact, the loss of a narrow area of vegetation could result in increased disturbance impacts at Construction (Sections 12.4.5.3.1.1, 12.4.3.5.1.3 and 12.4.3.5.2.1) and to a lesser degree operation (Section 12.4.4.5.1.1, and 12.4.4.5.2.1). The mitigation strategy proposed for all works areas in respect of birds includes the timely removal in as far as practical of vegetation and the isolation of working areas so that disturbance – construction lighting noise etc is reduced. Thus, mitigation is specified at Sections 12.5.1.5 and 12.5.2.5 in Chapter 12 of the EIAR for all birds in terms of vegetation removal, noise reduction etc.

6.17.12. A number of submissions (Rathfarnham Castle Residents Association and Rathfarnham Wood Residents Association) are concerned with respect of impact of the proposed scheme on the Whitechurch Stream (locally known as the River Glin). The NTA submit that it is not itself directly impacted by the Proposed Scheme. It is submitted, and I accept, that the assessment as presented in the EIAR and AA documents, uses the correct water body name as per the Water Framework Directive (WFD) – this is the Owendoher_010.

- 6.17.13. The historical mill race, is diverted underground, leading away from the Whitechurch Stream in the direction of the Rathfarnham Castle Park. The NTA submit that the Whitechurch Stream, is culverted in areas and the locations where the historical mapping, indicate it routing underground, in the direction of Rathfarnham Castle Park cannot be confirmed. It is submitted that the millrace is not an EPA identified watercourse. Notwithstanding this fact, the diverted channel flows through the Rathfarnham Castle Park to its ponds before continuing in a North-westerly direction along a narrow, largely vegetation-clogged channel before being culverted underground through the urban environment before discharging via a concrete pipe into the Owendoher River, due west of road bridge over the watercourse at Butterfield Avenue.
- 6.17.14. The NTA submit that the assessment for the Proposed Scheme, while not explicitly identifying the millrace channel from the Whitechurch Stream was considered in both Chapter 12 (Biodiversity) and Chapter 13 (Water) in Volume 2 of the EIAR, as well as the AA documents pertaining to the Proposed Scheme, in particular the NIS under the WFD named the Owendoher_010. Reference to the Whitechurch Stream is also captured in Appendix A of the flood risk assessment (which is contained Volume 4 of the EIAR).
- 6.17.15. I highlight that the works proposed to the culvert which carries the mill race comprises the following: At approximate chainage A160 it is proposed to extend an existing culvert under the Grange Road by circa 5m to facilitate road widening at the culvert location which is within the existing Rathfarnham Castle Park as documented in the Proposed Surface Water Drainage Works (Sheet 1, Part 2 of 3 in Volume 3 of the EIAR). The extended culvert will be a precast reinforced concrete box culvert that will match the existing form and dimension which is circa 2.3m wide and 0.65m high. The culvert extension will be laid to retain the existing level and gradient of the stream. In order to construct the culvert the existing boundary wall will be removed. To minimise disruption to the immediate area the existing stream will be temporarily overpumped for a short period of time during a dry period to allow the culvert extension. A small crane will be used to lift the culvert extension into place from the roadside under suitable temporary traffic management measures. After completion of the culvert extension the new boundary wall can be constructed. At approximate chainage A450 it is proposed to retain in place an existing culvert and headwall. At the location of the culvert it is proposed to widen the existing road by approximately

2m over the existing culvert. The existing culvert will be exposed during construction and surrounded with a suitable bedding material. A precast reinforced concrete protection slab will then be placed at a suitable level over the culvert to ensure that it is not damaged during construction and operation. In accordance with the requirements of the WFD, all water features are assessed following the EPA river dataset within the WFD compliance assessment with respect to potential impacts of the Proposed Scheme, and the proposed impacts specifically to Whitechurch Stream (or locally known as the River Glin), as well as the Owendoher River (see Chapter 13 of the EIAR; Section 5.1 of the NIS; and the WFD compliance assessment).

6.17.16. The Rathfarnham Woods Residents Association submission, which is referred to and appended to a number of other submissions, considers that the mill race is a fragile water feature in terms of the support that it provides to the Rathfarnham Castle Park wildlife, including for frogs, and this is supported from correspondence in respect of a separate development (Appendix I of the Rathfarnham Woods Residents Association submission). It is considered that there is potential for populations of frogs to occur in Rathfarnham Castle Park. The NTA submits that mitigation is included in Chapter 12 in Volume 2 of the EIAR, it will be implemented for amphibians – refer to Section 12.5.1.7. Refer also to Section 12.5.2.2.1.1 in Chapter 12 which outlines the standard drainage design controls included in the Proposed Scheme to protect water quality. However, the millrace, notwithstanding its potential diversion from the Whitechurch Stream is not considered of significant biodiversity value, given that it is culverted for much of its length. The species that use the pond are typical of such areas and indeed are habituated to urban settings. As the Proposed Scheme will not directly impact the pond, it is considered that there will be no likely change in use by these species.

6.17.17. In terms of aquatic species, the Whitechurch Stream is known to be suitable in parts, as a brown trout nursery, however it is understood that these areas are typically limited to areas further upstream such as around St Enda's Park, or at the confluence with the Owendoher River. Long culverted watercourses such as the mill race diversion that leads to Rathfarnham Castle Park are not considered desirable for fisheries. On the October 2023 site visit at the millrace ingress into Rathfarnham Castle Park the presence of 3-spine stickleback was noted, a widespread species that is tolerant of a range of water quality. No other fish were observed. The water entering the Rathfarnham Castle Park has for most parts an imperceptible flow and

the aboveground channels are often stagnant, with vegetation clogging them, with the only noticeable flow observed where physical drops in channel corridor occurs, e.g., after a bridge or when the egress flow enters the culvert near Rathfarnham Road/Butterfield Avenue intersection. But, based on the Proposed Scheme design and nature of the mill race, no perceptible impact in terms of blockage from the Proposed Scheme are likely, as the only alteration proposed is a short extension of the existing culvert, immediately inside the existing boundary wall where the mill race ingresses into Rathfarnham Castle Park.

6.17.18. I highlight it is submitted that the imperceptible flow that emerges from the culvert, nor the short culvert extension will not alter the current situation at either construction or operation.

6.17.19. I note that mitigation measures have been prescribed in the EIAR so as to avoid/prevent/reduce any significant impacts on the surface water environment, including the preparation of a Surface Water management Plan (SWMP) contained the CEMP (Appendix A5.1 on Volume 4 of the EIAR). The CEMP and SWMP will be implemented by the appointed contractor during the construction of the Proposed Scheme. It is notable that there are no substantive works proposed at the egress of the culvert and therefore the Proposed Scheme will not increase the likelihood of a blockage during the operational phase.

6.17.20. I consider that the development and assessment of the design of the Proposed Scheme considered the sensitivity of the surrounding watercourses. The Owendoher and Dodder Rivers under their respective WFD names are identified in both the Chapter 12 Water and Chapter 13 Biodiversity (e.g., Section 12.3; Section 13.3.1) and Appropriate Assessment Reports (e.g., Section 3.3 of the NIS)) have assessed and were fully cognisant of the connectivity of the Owendoher_010 and all up- and downstream connectivity.

6.17.21. I agree that the mitigation strategies set out in the EIAR (e.g., the SWMP identified in CEMP Appendix A5.1 in Volume 4 of Chapter 4), which will be implemented during the construction of the Proposed Scheme are applicable to the watercourse within the Rathfarnham Castle Park. The fisheries and biodiversity potential of the ingress channel is such that an approximate 5 metre extension of the existing box culvert is not considered to materially alter the current condition of the canalised mill race which is routed through the Rathfarnham Castle Park. Some

submissions raise the potential for impact on frogs, however it is considered that the proposed works associated with the box culvert extension, will not alter the potential for frogs to be present nor result in loss of perceptible habitat that could be used by them. The remainder of the open mill race channel within the Rathfarnham Castle Park will remain unaffected by the Proposed Scheme.

6.17.22. I highlight South Dublin County Council Development Plan Policies GI2 and GI3 which relate to protecting natural watercourses and enhancing their biodiversity value. The assessments, however, have been cognisant of this, it is submitted that the millrace is not a natural channel where it comes into the RCP, but rather a highly modified watercourse. Regard being had to the information contained in the EIAR and proposed mitigation it is considered that the proposed scheme is will not result in significant negative effects to water quality in the millrace. I am satisfied that the issues raised in the submissions regarding the River Glin are adequately addressed in the EIAR

6.18. Residential Amenity,

6.18.1. It is important to note at the outset that concerns relating to residential amenity are outlined within the majority of submissions received and whilst many submissions relate to a particular section of the proposed scheme, such as: Rathfarnham Castle Park, Rathfarnham Road, Terenure Road East, Templeogue Road, Rathmines Road Upper, the urban villages of Terenure, Rathmines and Rathgar, relocation or omission of bus stops, right turn bans, diversion of traffic and impact upon access for local traffic, bus gates etc... It is important to clarify that the impact to residents and consideration of same is central to the entirety of this assessment and is one of the key considerations of the EIAR section below. It is therefore not my intention to repeat all of the concerns raised in relation to residential amenity (consideration has been given throughout the report to impact upon Rathfarnham Castle Park, project design, consideration of alternatives, proposed Bus Stops strategy and bus gates etc... as set out above) I note the CPO Report 316377-23 which accompanies this report and also deals with similar submissions. The project is justified in terms of principle, common good, community need, national and local policy context for climate change and sustainable movement and transport.

- 6.18.2. The NTA submit that a total of 94 community receptors (75 residential properties and 19 community facilities) are impacted by temporary land take as a result of the Proposed Scheme. 12 residential properties are expected to experience significant temporary land take impacts during the construction phase. Of the residential properties that experience significant impacts, seven are located along Rathfarnham Road (67 and 153 – 141), all of which require temporary land take from a large part of the driveways. Two properties at Rathfarnham Wood (10 and 11 – demolition of garden sheds and acquisition of a proportion of rear gardens) and three at Fortrose Park (11, 14 and 15) acquisition of a proportion of rear garden, demolition of garden sheds) are expected to experience significant impacts.
- 6.18.3. It is highlighted that the entire area identified for temporary acquisition will not be required for the duration of the works. It is acknowledged that during the construction of the works there will be inconveniences for all users, but this will be managed to minimise impacts for all affected parties. I note that prior to undertaking any accommodation works within private property, the appointed contractor will engage in consultation with landowners, during consultation the landowner will have an opportunity to raise any concerns and outline any requirements associated with the land in question.
- 6.18.4. A number of submissions raised concerns around the loss of privacy, impact upon property values, access and breach of Part M of the Building Regulations, location of construction compounds in amenity and public open space areas and in proximity of housing, increased traffic volumes, displacement of traffic to surrounding streets, impact upon local businesses, justification, need and cost benefit, removal of trees and hedges, non-continuous cycle lanes, and lack of consideration of alternatives / other less intrusive measures.
- 6.18.5. The NTA's response deals with each point raised in detail. I note that issues such as justification, need, removal of trees, loss of privacy, impact upon property values etc common to all areas have already been dealt with in the CPO report which accompanies this report and throughout the subject report. In the interests of avoidance of over duplication of issues and concerns raised both reports should be read in conjunction with one another. There is a substantial cross over of issues and concerns raised in both the roads CPO case 316377-23 and in the subject planning case. I have read all of the submissions in detail and read and considered the NTA's detailed response to each issue raised. The level of cross referencing in term of

issues raised is considerable. As set out in the CPO case (316377-23) I consider that the proposed scheme and CPO can be considered / approved at the same time, in fact it is encumbering upon the Board to do so. Further, as concluded in my report under 316377-23, there are many practical reasons, including, in relation to the practicalities of delivering the scheme, the efficient use of the decision maker's resources and consistent consideration of issues raised, as to why it is entirely appropriate to deal with the section 51 application and the related application for confirmation of the CPO together.

- 6.18.6. I have grouped many concerns in term of scheme wide concerns and area based issues, I note that, during construction, there will be some temporary disruption / alterations to on-street and off-street parking provision, and access to property in certain locations along the Proposed Scheme. The NTA submit that 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. Details regarding temporary access provisions will be discussed with residents and business owners 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.
- 6.18.7. It is of note that many submissions raise concerns about noise and air quality arising from the proposed scheme and in some instances due to the removal of existing vegetated boundaries, I would refer the Board to the EIAR section of this report in which such impacts are robustly examined and whereby it is concluded that no significant impacts in relation to either factor is expected to arise. The proposed scheme is expected to have a long-term positive impact on noise and air quality as the introduction of a fully electric fleet and the overall reduction of vehicular traffic travelling along the route will significantly improve the current situation in terms of these emissions.
- 6.18.8. I have considered issues in relation to noise & vibration, construction lighting, visual amenity, loss of public amenity, biodiversity, land use zoning, open space, flood plain, archaeological impact, architectural heritage impact, compound traffic and overspill parking into residential areas, noncompliance with SDCC Development Plan 2022 – 2028 and construction traffic. I note the robust Construction Environmental Management Plan (CEMP) and proposed traffic management measures (CTMP) prepared for the project. The appointed contractor will liaise with landowners through the Communications Plan agreed with the NTA, where access to their property is

temporarily affected by works. The contractor will also be required to keep the effectiveness of the mitigation measures under review.

- 6.18.9. I have considered matters of impacts upon residential amenity, such as, impact upon the quality of resident's lives, noise and air pollution, dust, impacts upon elderly, construction traffic and lighting.
- 6.18.10. I am satisfied therefore that no significant long-term impacts are expected in relation to noise and air quality along the proposed scheme that would impact residential amenity to such a degree as to warrant a refusal.
- 6.18.11. On balance, I consider that the Proposed Scheme will have positive impacts on residential amenity through the general improvement to the street environment. Residential areas along the CBC will then become healthier and better places to live. This substantially outweighs the negative impacts of the Proposed Scheme which will mostly be short term and concentrated in the construction phase. Over time, as landscaping matures, any adverse impacts during the operational phase will become less perceptible. I am therefore satisfied that the proposed works including the reallocation of road space and temporary use of construction compounds would not impact residents to such a level as to warrant a refusal of the Proposed Scheme.
- 6.18.12. I highlight for the attention of the Board that the proposed Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme is supported and welcomed by Dublin City Council and South Dublin County Council as it will ensure the delivery of a number of key policies and objectives of both the South Dublin County Council Plan and the Dublin City Development Plan 2022-2028.
- 6.18.13. 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 I acknowledged that these improvements will make it easier for people to access and use public transport. I 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.

6.19. Loss of privacy

- 6.19.1. Third parties have raised concerns in relation to the removal of mature vegetated front boundaries which provide a privacy screen and buffer between these properties

and Rathfarnham Road, Templeogue Road and Terenure Road East also to the rear of properties at Fortrose Park. Concerns are also raised that traffic lanes will be closer to properties than at present and this further increases the perceived loss of privacy.

6.19.2. Whilst I acknowledge these concerns, the removal of boundaries and vegetation is unavoidable and will be replaced on a like for like basis, whilst the applicant will replace walls and railings it is difficult to replace mature vegetation.

6.19.3. Notwithstanding the loss of vegetated buffers, I have cognisance to the view that these dwellings are located in an urban area which is heavily trafficked by pedestrians and vehicles and as such front garden areas are not by the nature of the surrounding environment 'private' open spaces. There is always some degree of view from the public road. Whilst I acknowledge that vegetation can provide a sense of enclosure, I am satisfied that individual properties along the route will remain adequately set back from the public footpath so as not to significantly impact on the privacy of residents beyond what would be considered acceptable in such an urban environment.

6.19.4. I am therefore satisfied that the proposed works including the reallocation of road space would not impact the privacy of residents to such a level as to warrant a refusal of the proposed scheme.

6.20. Other Issues

Impact upon property values

6.20.1. Several concerns relate to impact on property values. Some of the reasons quoted for the decrease in value include increase traffic volumes, increased bus numbers and speeds, poorer air quality, increased noise and compulsory purchase order.

6.20.2. The Proposed Scheme will enhanced walking, cycling and bus infrastructure on this key access corridor, which will enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor. It will greatly improve transport services for all that live along the route, by providing significantly improved sustainable transport options, thereby reducing impacts upon air quality.

6.20.3. In general, I note the NTA's response that in overall terms the public realm improvements planned by the NTA may lead to an increase in value of both

residential and retail property prices, along the corridor, with evidence showing that investing in public realm creates nicer places that are more desirable for people and business to locate in, thereby increasing the value of properties in the area.

6.20.4. I agree that a combination of improved connectivity as a result of the dedicated public transport infrastructure being rolled out as well as public realm improvements, will not have a negative impact on values of residential properties along the scheme.

6.20.5. Overall, I am satisfied that there is a justifiable need for the proposed scheme. I am also satisfied that the proposal would not impact residents in any negative manner and is compliant with international best practice and in line with all government policies in terms of connecting populations to high quality active travel and public transport corridors.

Access and breach of Part M of the Building Regulations.

6.20.6. Third party concern is raised that alterations will give rise to a significantly steeper access gradient and breach of part M of the Building Regulations to access driveways to the front of 51 – 71 Rathfarnham Road.

6.20.7. The NTA disputes this concern. It is submitted that alternatives have been considered, also the design of the proposed scheme has been carried out, so as to, minimise impacts on properties at this location. The road will be raised on the section north of the River Dodder, the extent to which it is required within the limits of Part M, such that it will not result in any increase to the maximum driveway gradients.

6.20.8. The NTA response to the concern raised highlights that the proposed scheme will be carried out so as to minimise impacts on adjacent properties. It will not result in any increase to the maximum driveway gradients at properties 51 – 71 Rathfarnham Road. This has been achieved through a combination of the following design measures aimed at minimising the impact on adjacent properties:

- Raising the centreline level of the road at this location (as presented in the Mainline Plan and Profile drawings provided the Volume 3 of the EIAR); and
- Retaining existing footpath gradients. The works may require minor regrading works within some properties but will not result in an increase to the maximum gradient experienced in these properties.

6.20.9. Cognisance being had to the submission and additional updated RW Nowlan Planning Consultants Report, dated March 2024 and NRB Consulting Engineers,

initial submission and updated letter dated March 2024 on this matter. I consider that the response and profile drawings confirm that minimal change in ground level will occur with no increase to the maximum driveway gradients at properties 51 – 71 Rathfarnham Road.

6.20.10. It is submitted that in the case of No. 61 Rathfarnham Road, the permanent acquisition will result in the loss of 2.0m of lands with an additional 2.0m temporarily required to allow for the construction of boundary treatment works and tying into the existing garden/driveway. I highlight that the front boundary wall, including gate and entrance pillars will be at least 15m from the front of the house. This would not, in my opinion, introduce any additional risk to the owners during the operation of the proposed scheme and that this should not hinder the availability of parking in the driveway nor the ability to turn within the driveway.

Location of construction compounds in amenity and public open space areas and in proximity of housing

6.20.11. Construction Compounds are proposed in the following six locations:

- Construction Compound TR1 will be located south of the Spawell roundabout, at the Tallaght Road / Spawell Link Road junction.
- Construction Compound TR2 will be located north-west of Terenure Road North, between Eaton Road and Eagle Hill Avenue.
- Construction Compound TR3 will be located along Dodder View Road, across the road from Bushy Park, in the greenfield area between Dodder View Road, Woodview Cottages and Church Lane.
- Construction Compound TR4 will be located on Military Road, perpendicular to Rathmines Road Lower, south of St Marys College.
- Construction Compound TR5 will be located on Richmond Street South, on the slip road between Richmond Street South and Harcourt Road and
- Construction Compound TR6 will be located on Spawell Link Road, between Spawell Roundabout and the Firhouse Road.

6.20.12. The location of the construction compounds are shown in Figure 5.1 in Volume 3 of the EIAR.

- 6.20.13. Construction Compound TR3 will be the main construction compound for the Proposed Scheme, with construction compounds TR1, TR2, TR4, TR5 and TR6 acting as satellite compounds. TR3 being the main compound, it will be in place for the full construction duration i.e. 2 years.
- 6.20.14. Several submissions have raised concern with respect to construction compound TR3. I note the contentious nature of temporary CPO of lands and their use as construction compounds, in particular, the compound located along Dodder View Road, across the road from Bushy Park, in the greenfield area between Dodder View Road, Woodview Cottages and Church Lane (TR3). The area of construction compound TR3 is stated as approximately 5,120m². Submissions from third parties and SDCC advise that the location of the proposed compound is believed to be too close to residential properties and note that the location has been a well-used amenity area for a long time. I note residents have raised safety concerns in relation to the associated HGV traffic, close proximity to a busy residential area, loss of green open amenity space, impacts from lighting, impacts upon bats and biodiversity. SDCC also have concerns and submit, that if no alternative location can be identified, that the NTA should propose upgrade works to improve the amenity value of the green space in compensation for its temporary loss to residents.
- 6.20.15. The NTA have responded setting out their powers under the relevant legislation, in relation to securing the provision of public transport infrastructure. It is submitted that the use of the lands is temporary and will be transferred back to the local authority upon completion of the scheme.
- 6.20.16. The NTA submit that the construction compound locations have been selected due to the amount of available space, their relative locations close to the majority of the major works and access to the National and Regional Road network. With respect to construction compound TR3 it is submitted that a construction compound has been located at this site, during recent construction works carried out for the Dodder Greenway Scheme. It is further stated that following completion of the construction works, all of the construction compound areas will be cleared and reinstated to match pre-existing conditions.
- 6.20.17. The NTA submits that close liaison with SDCC has been in place during the planning and design stage, which included extensive dialogue with the relevant sections within SDCC. The NTA is satisfied that 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. I acknowledge the NTA's commitment to continue the very positive and constructive liaison with SDCC throughout the preparation of the construction-stage documents and during the construction works.

- 6.20.18. I have reviewed the proposed compound acquisitions and while I have sympathy to the concerns raised by residents living in proximity of construction compound TR3. I note it will result in some short-term removal of grassland but no impact on the surrounding mature trees or woodland. The construction works will detract from the streetscape character and amenity, however, it is short term and a temporary use.
- 6.20.19. I consider that the justification and necessity for such compounds is clear and given the temporary nature of the use, I am satisfied, it is justified in the context of the common good, in that the proposed development will provide a sustainable and active travel scheme benefiting all residents in the area. It is within the remit of any competent authority, in this instance the NTA to ensure that construction compounds, in particular TR3, are reinstated to a high standard and fit for purpose and it is incumbent upon them in my opinion to improve the amenity value of the green space for local residents upon reinstatement.
- 6.20.20. I am satisfied that the matters raised can be successfully addressed between SDCC, DCC and the NTA. I note the additional response from SDCC with respect to construction compound TR3 at Woodview Cottage Green. The response concludes that following the response by the NTA, to issues raised, SDCC are generally satisfied with the compound location save for the suggested additional screening around the compound to minimise the visual impact on the adjacent green amenity.
Increased traffic volumes, pedestrian safety & displacement of traffic to surrounding streets.
- 6.20.21. A number of submissions raised concerns around the impact of the proposal, in particular the proposed bus gates, on traffic movement in the area.
- 6.20.22. As set out in Section 2.1 of EIAR Chapter 2 'Need for the Scheme', the proposed scheme is needed in order to enable and deliver efficient, safe and integrated sustainable transport movement along the corridor through the provision

of enhanced walking, cycling and bus infrastructure on a key access corridor in the Dublin region.

6.20.23. Overall, I believe the scheme will provide an attractive alternative to the private car and promote a modal shift to public transport, walking and cycling. I believe it has been determined that the impact of the reduction in general traffic flows along the route will be a positive, moderate and long-term effect whilst the impact of the redistributed general traffic along the surrounding road network will have a negative, slight and long-term effect. Thus, overall, there will be no significant deterioration in the general traffic environment in the study area as a consequence of meeting the scheme objectives of providing enhanced sustainable mode priority along the direct study area. In meeting its objectives, the Proposed Scheme will deliver strong positive impacts in terms of promoting active travel and sustainable transport. It is noted that the modelled forecasts for the 2028 opening year indicate:

- A significant decrease in people travelling to/from the city by car in each peak period with decreases of 30% and 39% in the AM and PM peak periods respectively.
- A significant increase in people travelling by public transport in each peak period with increases of 123% and 145% in the AM and PM peak periods respectively.
- A significant increase in people walking/cycling in each peak period with increases of 79% and 91% in the AM and PM peak periods respectively.

6.20.24. I note sections 6.6 'Route Alternatives Considered' and section 6.7 'Project / Junction Design' above, which are of relevance to traffic volume, safety and displacement. I highlight it is concluded that the scale of the BusConnects CBC Infrastructure Works will be transformational for cycling in Dublin, delivering a large number of the primary cycling routes identified in the Greater Dublin Area Cycle Network plan.

6.20.25. The assessment presented in Table 17 of Appendix A6.4.4 in Volume 4 of the EIAR, shows that the proposed scheme would result in negligible traffic impact on most of the extensive list of junctions assessed, incl. Castlewood Avenue/Charleston Road and Belgrave Square North, Butterfield Ave / Firhouse Road / Old Bridge Road, Lower Dodder Road / Orwell Road, Mountpleasant Place / Ranelagh / Ranelagh Road, M50 Junction 12, Rathmines Road Upper Cowper Road, Church

Avenue / Rathmines Road Upper, as a result of the proposed scheme. I refer again to my assessment above in section 6.7 of this report 'Project / Junction Design'. Where it is concluded that the proposed scale of the BusConnects CBC Infrastructure Works will be transformational for cycling in Dublin, delivering a large number of the primary cycling routes identified in the Greater Dublin Area Cycle Network plan. With proposals of this scale, it is critical that the overall design approach matches the stated ambition and can achieve a longevity that such investment deserves. Also, section 6.11 'Pedestrian footpath widths and public realm' where it is considered that the Proposed Scheme will facilitate a modal shift from car dependency through the provision of walking, cycle, and bus infrastructure enhancements thereby contributing to an efficient, integrated transport system and facilitating a shift to a low carbon and climate resilient city. The proposed scheme will result in the provision of new / refurbished pedestrian facilities and footpaths along the scheme and associated ancillary works. I note pedestrian facilities across the scheme shall be improved, with additional crossing locations, increased pedestrian directness, provision of traffic calming measures to reduce vehicle speeds, improved accessibility and increased footway and crossing widths. I consider the public realm upgrades, including widened footpaths, high quality hard and soft landscaping contribute towards a safer, more attractive environment for pedestrians.

6.20.26. All proposed facilities have been designed in accordance with the principles of DMURS and the National Disability Authority (NDA) 'Building for Everyone: A Universal Design Approach' (NDA 2020) with regards to catering for all users, including those with disabilities. As previously stated, I am satisfied that the scheme has been developed having regard to relevant accessibility guidance and universal design principles so as to provide access for all users.

6.20.27. Overall, it is anticipated that there will be a positive, significant and long-term effect to the quality of the pedestrian, cycle and bus infrastructure along entire scheme, during the operational phase, which aligns with the overarching aims and objectives of the scheme. I acknowledge the attraction of the private car, and that it may be the only viable option for some for medium to longer distance journeys. I also note that the level of access for private motor vehicles will be altered, however, it has been largely retained, albeit redirected along the CBC. It is notable that CSO figures show that more than half of travellers use the car for journeys under 2km. If drivers are limited to a realistic speed limit, the introduction of bus gates and turn

bans with enhanced pedestrian and cycle infrastructure they may begin to realise that alternative modes, particularly with the emergence of e-bikes and e-scooters, are just as attractive.

6.20.28. In summary, it is my opinion that while there will be some redistribution of traffic as a result of the proposed scheme, the traffic impact is considered to be negligible. See also section 8.0 EIAR 'Roads and Traffic' assessment of this report.

Impact upon local access and businesses

6.20.29. A number of submissions have concern that the proposed traffic management measures will impact upon access. I highlight that impact upon commercial, service and community premises has already been dealt with above in the preceding section 6.14 of this report.

6.20.30. I note that the two bus gates in the community areas of Terenure and Rathmines are designed to restrict access to private vehicles and prioritise buses. The impact on private vehicles passing through Templeogue Road at Fergus Road in an inbound direction and Rathmines Road Lower at junction with Lissenfield (both inbound and out bound) will require minor local rerouting but will not prevent the ability to access local property / premises in the area. While the proposed bus gates may result in an inconvenience for those seeking to access businesses, community (Church of Mary Immaculate Refugee of Sinners) or residential premises in Rathmines and Terenure by car, vehicular access will be retained via routes from all directions. I note that the bus gates are for a relatively short distance and while they will required 'No through traffic except public service vehicles and bicycles', alternative means of access will be retained to Rathmines Road Lower, Lissenfield and to property on Templeogue Road area for those who wish to use private cars, albeit, It will be more circuitous when approaching from both east and west of Rathmines Road Lower and from the west through Templeogue Road than that currently available.

6.20.31. Overall, I consider the provision of the bus gates and their operational hours to be appropriate and in the best interests of promoting the use of sustainable modes of transport, ensuring public transport priority, and minimising the overall impacts of the Proposed Scheme.

6.20.32. Submissions raise concern with respect to access to car parking at Bushy Park (on-street within Rathdown) and Terenure Rugby Club. These submissions note

that there is a risk of overspill parking onto Lakelands Park, Fortfield Road and neighbouring streets. I note the NTA's response to concerns raised around access routes. Access to Bushy Park and Terenure Rugby Club will be retained along other routes, as such access to existing car parking facilities will still be accessible by car, albeit by alternative routes for some.

- 6.20.33. In terms of access to the Church of Mary Immaculate Refuge of Sinners, as stated above in section 6.14 of this report, it is noted that the primary car park associated with the church is accessed off Richmond Hill. Access/egress to this car park from the south will remain as per the existing situation. Access to the smaller car park (c. 8 spaces) in front of the church on Rathmines Road Lower will be accessible from north of the bus gate.
- 6.20.34. I note and agree with the assessment and view put forward by the NTA in respect of impact upon businesses as a result of the proposed scheme, including impact upon deliveries. The bus gates are not expected to have a significant impact on private vehicles accessing commercial businesses along these stretches of roads due to the lack of on-street parking provision, however they will impact accessibility in terms of lengthened and re-routed journeys.
- 6.20.35. I acknowledge that the proposed scheme will deliver positive impacts to pedestrians, cyclists and bus users which will facilitate greater capacity along the corridor for users of sustainable modes of transport to access properties. I refer the Board to the overall assessment of 'The Economic Impact of the Core Bus Corridors' included in Appendix A10.2 in Volume 4 of the EIAR. The assessment indicates that evidence from case studies suggests that, in some cases, businesses overestimate the number of people arriving by car whilst the proposed enhancements to the walking, cycling and bus infrastructure along the route will increase use of sustainable transport and may positively impact on footfall to the business.
- 6.20.36. There is strong international evidence to suggest that the proposed improvements will lead to further increases in the use of sustainable transport. This should, in turn, more than compensate for reductions in visits by car users. Whilst spend per visitor may fall slightly, the overall spend rises due to the increased overall footfall. This effect should occur as soon as the new proposed routes open with shoppers choosing to make even more use of sustainable transport option. Whilst there is limited evidence of the impact during the construction work, this is finite.

Justification, need and cost benefit.

6.20.37. Many of the submission raised the matter of justification, need and cost benefit of the proposed scheme.

6.20.38. This matter has already been addressed in section 6.3 'Justification and need for the proposed scheme', of this report above. It is also addressed in the my report on the CPO 316377-23. I note paragraph 6.1.17 of the CPO report which concludes in respect of 'Community Need' that:

"The delivery of the Templeogue / Rathfarnham to city centre Busconnects scheme is a controversial route (as is evident from the number of submissions received and issues raised) and difficult geographically (urban setting with established street furniture, boundaries, gardens and trees), it will however be of benefit to the wider community. I acknowledge given the scale of the works that there will be disruption to residents, businesses and those who need to transit through this area during the construction phase, however, this will be finite, relatively short term, mitigated and managed. On balance, such inconvenience during the construction phase is necessary for any change and improvement to occur. From the above it is clear that there is distinct and obvious community need and justification for the proposed scheme, in the longer term, from a population growth and congestion perspective; through the provision of the necessary infrastructure to facilitate connections and connectivity throughout the corridor and the wider area. The infrastructure facilitated by the CPO will provide greater opportunities and enhanced connectivity for all sections of the local community (and those who need to transit through this area) and all will be able to enjoy the wider benefits arising in terms of modal shift, reduced congestion, and reduced emissions, as well as providing healthier and more sustainable transport options. I note, a recent High Court Judgement (2022) IEHC 7, Record No. 2020/816JR - Ballyboden Tidy Town Group V An Bord Pleanala regarding sufficient local public transport capacity in the context of urban development and I consider it of direct relevance to the subject project."

6.20.39. The proposed development is being developed in response to the need for a sustainable, reliable form of public transport along the main radial routes from the City Centre. Sustainable transport infrastructure is known to assist in creating more sustainable communities and healthier places to live and work while also stimulating

our economic development and also contributes to enhanced health and well-being when delivered effectively.

6.20.40. As set out above the Rathfarnham-Terenure-Rathgar-Rathmines (The Proposed Scheme) serves some of the busiest bus routes in Dublin. Demand for travel by bus is anticipated to continue to grow in this corridor into the future, in line with population growth. I draw the Board's attention to the list of planning applications for residential / BTR / student accommodation / hotel accommodation / mixed use development, within the planning history section of this report above. The route is one of the busiest bus corridors in the Dublin Region and is forecast to accommodate further population growth.

6.20.41. In overall conclusion it is clear that there is an obvious need and justification for the proposed scheme which has been clearly demonstrated from a population growth and congestion perspective and in the interests of land use and transport planning integration. It is also clear from the abundance of policy documents and plans at both an EU, national and local level that the proposed scheme is supported throughout all levels of government policy and therefore is justified and acceptable in principle.

Removal of trees

6.20.42. One of the main reasons of concern raised has been with respect to removal of trees and vegetation. As noted above in paragraph 6.31 of this report 'Visual Impact / Townscape', I believe removal of trees needs to be balanced against an enhanced level of service for public transport and for pedestrian / cycle connectivity. I am satisfied based on the information submitted that loss of trees and vegetation have been adequately considered and can be resolved. Regard is had to the submission by SDCC and the submitted Arborist Report re: concern of estimated tree loss within Rathfarnham Castle Park and concern of low level of replacement tree planting). Concern raised by DCC with respect to the proposal to provide a segregated cycle track and footpath within Bushy Park, on the route of the existing shared path. The parks department raises concerns about the potential for impact on existing trees within the park and also raises concerns about potential conflicts between cyclists and pedestrians. Concern is also raised about the proposed bound gravel path within the green area adjacent to Rathdown Park, and the potential impact on tree roots due to the construction of this path.

6.20.43. It is my considered opinion that there is no issue with constructing footpaths across the linear open space in Bushy Park to serve bus stops on Templeogue road from Rathdown Drive, the principle of tree removal within a linear strip of Rathfarnham Castle Park or the proposed bound gravel path within the green area adjacent to Rathdown Park, however, the details will need to be agreed with the Parks, Biodiversity and Landscape Services teams of the relevant local authority, namely SDCC.

6.20.44. As set out above in section 6.16 of this report, trees and vegetation to be removed are described in the Arboricultural Impact Assessment Report (AIAR) which is included within Volume 4 (Part 4 of 4) of the EIAR. The trees to be removed will be compensated for through the planting of new trees. These are illustrated on the Landscape General Arrangement drawings accompanying the application. It is submitted that 169 individual trees will be removed as a result of the proposed scheme. The new planting will comprise of:

- 400 trees planted
- 126.4m of proposed hedgerow
- 7,300 m² of proposed species rich grassland
- 932 m² of proposed ornamental planting; and
- 9,212 m² of proposed amenity grassland planting.

6.20.45. I note the concern raised by Mary O'Mahony and Thomas Sexton with respect to loss of a c.100 year old beech tree in the private rear garden of 9 Rathfarnham Wood.

6.20.46. The NTA response submits that the tree at No. 9 Rathfarnham Wood is identified for removal. This tree has been surveyed and assessed as part of the AIAR, and has been categorised as follows:

- A 16m tall mature Beech displaying overall good condition, of Category B2 and with 20+ estimated remaining years.

6.20.47. I note concern is also raised that the proposals do not indicate the removal of trees within 63 Terenure Road East (Elm Tree), 61 Terenure Road East, 60 Terenure Road East (Beaumont House), and a tree at 59 Terenure Road East (Argos House).

6.20.48. The NTA's response states: 'In relation to 63 Terenure Road East, no trees are identified for removal. While there are a number of small trees to west of the vehicular entrance close to the boundary wall, the diameters of these were less than 75mm and as such were not surveyed. In terms of 61 Terenure Road East, 3 no. trees are identified for removal'.

6.20.49. With respect to Argos House (No. 59 TRE) I note the NTA's response accepts the error of omission of a tree identified for removal in the front garden of the property close to the eastern boundary from the Arboricultural Impact Assessment Report or on the Landscape General Arrangement Drawings. It is noted, however, that the planned removal of this particular tree was identified in the tree impact assessment and the loss of the tree included in the number of trees identified to be removed across the scheme (169 trees). I refer the Board to section 8.0 EIAR 'Landscape Townscape and Visual' for further detailed assessment in this regard.

6.20.50. It is submitted by the applicant that although the design of the schemes has sought as far as practicable to limit impacts on private properties and trees, the works will involve acquisition from several residential properties with associated removal of boundaries, trees and other plantings. There will be a substantial impact on the streetscape of Terenure Road East from the loss of several prominent specimen trees (large beech tree to the front boundary of Argos House and other trees in the adjacent garden). These elements of works will result in considerable changes along the Terenure to Rathgar section of the proposed scheme, but other sections of the scheme will involve relatively modest changes. It is acknowledged that there will be a change to the alignment of historic boundary features and loss of several prominent mature garden trees which are located on the edge of the street. However, it is submitted that there will be provision of several new street trees along Terenure Road which over time will neutralise the negative effects associated with loss of trees removed during the construction phase.

6.20.51. Overall, I believe tree loss is unavoidable and replacement and additional planting will compensate for tree and vegetation removal. The merits of the scheme, aided by mitigation measures proposed, far outweigh certain aspects of tree removal within this existing built-up area. As set out in section 6.31 'Visual Impact / Townscape' of this report, above, it is recommended that conditions be attached regarding tree protection measures for all existing trees and that prior to the replacement of trees, hedging and planting which is to be removed the NTA shall

liaise with the relevant landowner with regard to the species, size and location of all replacement vegetation. The NTA shall also employ the services of an appropriately qualified arboriculturist and Landscape Architect for the full duration of the proposed works to ensure landscaping and tree works are implemented appropriately. Tree loss will be mitigated with a robust and high-quality scheme of new tree planting as detailed in the Landscape General Arrangement drawings included in EIAR Volume 3 Chapter 4. As stated, 400 trees will be planted throughout the scheme resulting in a net increase of 231 trees (24%).

6.20.52. Trees and vegetation to be retained within and adjoining the works area will be protected in accordance with the British Standard Institution (BSI) British Standard (BS) 5837:2012. Works required within the root protection area (RPA) of trees to be retained will follow a project-specific arboricultural methodology for such works, which will be prepared by a professional qualified arborist. For details of trees to be retained refer to Tree Protection Plans (BCIDC-ARP-ENV_LA1012_XX_00-DR-ES-0001 in the Arboricultural Impact Assessment).

6.20.53. I consider that any clearance of trees and shrubs during the main bird breeding season from March to August inclusive should be avoided and I recommend that, if the Board is minded to approve the Proposed Scheme, that a condition be attached to any grant of permission requiring this.

Continuous cycle lanes

6.20.54. A number of submissions raised concerns about gaps in segregated cycle infrastructure along the proposed scheme stating that segregated facilities should be provided along the length of the route. These submissions included examples of areas where no segregated facilities are proposed including Terenure Road East, Templeogue Road west of Templeogue Village and Rathfarnham Road south of Dodder View Road.

6.20.55. I note and refer to the cross over of issues assessed, above in section 6.9 'Route Alternatives Considered', section 6.10 'Project / Junction Design' and section 6.21 'Provision for cyclists'. I highlight that Chapter 3 Consideration of Reasonable Alternatives of Volume 2 of the EIAR outlined the extensive options assessment exercise which has been undertaken to determine the Preferred Route. In constrained locations, a balanced approach has been taken in selecting the Preferred Route Option. In some locations this has resulted in no segregated cycle

facility being provided, in order to minimise landtake and impact upon properties. It is noted that in these areas, cyclists will share with the bus lane and the speed limit has been reduced to 30km/h.

6.20.56. Table 4.1 of EIAR Volume 4 Proposed Scheme Description provides a summary of changes as a result of the Proposed Scheme. The table notes that in the existing scenario, 28% of cycling facilities, covering 11km in both directions, are segregated. However, under the Proposed Scheme, 85.4% of cycling facilities will be segregated, totalling 23.3km. This represents a substantial 112% increase in segregated cycling facilities along the proposed route. This I consider is a significant improvement and is to be welcomed.

6.20.57. BusConnects is essentially a retrofitting project which seeks to reallocate road space for bus priority and active modes of transport. Care must therefore be taken to address conflicts between active modes within the reallocated space. It may be the case that, even with road space reallocation, space for active modes will still be limited and therefore cyclists will share the bus lane for short distances and an alternative cycle facility is proposed along a quiet off-street section. Added to this is the need for a consistent design approach for all modes when introducing new junction layouts. I consider that the Proposed Scheme represents a substantial improvement in terms of safety and comfort for cyclists.

6.20.58. Overall, I am satisfied that the proposed scheme will enhance the potential for cycling by providing safe infrastructure for cycling, segregated from general traffic wherever practicable, see also assessment set out in 'Roads and Traffic' section 8.0 of this report.

Consideration of alternatives / other less intrusive measures.

6.20.59. A response to this matter has already been set out, in section 6.9 of this report, above. I am satisfied that based on the information provided that adequate consideration of alternatives and or other less intrusive measures has been considered both as part of the statutory consultation process and the non-statutory process undertaken.

Consultation Process

6.20.60. The submissions also raise concerns in relation to the consultation process of the proposed scheme, the applicants response in this regard is detailed above within the adequacy of consultation section of this report section 6.5 as such will not be repeated here, except to state that the applicant entered into extensive consultation with the general public and I am satisfied that based on the information provided that adequate consultation has been considered both as part of the statutory consultation process and the non-statutory process undertaken. I am therefore satisfied that all the statutory requirements have been met and that the applicant has made all reasonable efforts to engage the public.

6.21. Recommended Conditions.

- 6.21.1. I note in their submissions that both SDCC and DCC planning authorities have included lists of recommended conditions. Where relevant to any of the above assessment these have been discussed previously. The Board should note that the conditions did not raise any significant issues in relation to the route or principle of the Proposed Scheme and were focused on smaller detailed design issues.
- 6.21.2. A number of the conditions requested are seeking contractual agreements to be conditioned in terms of handover, management, and maintenance of the Scheme following construction. In relation to these items, I am satisfied that the relevant legislative provisions are in place for the construction and handover of the roads infrastructure to render the attachment of such conditions unnecessary.
- 6.21.3. Other conditions are requested to ensure ongoing liaison, agreement, and engagement in relation to a number of detailed measures such as drainage, methodologies of conservation and recording and carrying out works around heritage items, traffic management, agreement on detailed design features, reinstatement works, standards to be adopted. I consider that such conditions requiring further liaison and agreement with the relevant location authority to be generally acceptable and in accordance with best practice, although I note that the applicant has stated that such liaison will occur as a matter of course and that additional specific conditions are not required, I consider that the imposition of such conditions on any consent that may issue would be appropriate and in the interests of proper planning and sustainable development.

6.22. Conclusion on Proper Planning and Sustainable Development

6.22.1. Overall, I am satisfied that the Proposed Scheme will deliver significant improvements to bus, cycling and pedestrian infrastructure, which will facilitate a reduction in traffic congestion, promotion in the use of sustainable modes of transport all while minimising impacts on the amenities of the area, residential population, heritage features, and biodiversity. I am of the opinion that the subject works if implemented will encourage a significant modal shift from the private car towards sustainable travel modes into and out of the city. In this regard I have reviewed all submissions lodged and noted the concerns raised by third parties. I acknowledge the issues raised and note that there will be a certain level of impact and inconvenience during the construction phase throughout, and some changes and alterations during the operational phase, however, I do not consider that these impacts are significant or significantly adverse having regard to the overall benefits that will arise from the Proposed Scheme. I am satisfied that the application documentation is clear and demonstrates that the scheme has been designed to minimise impacts and that robust justification has been provided in relation to the various elements of the infrastructure proposed. Furthermore, I consider that the application documentation contains a comprehensive suite of mitigation measures which will minimise impacts where and as they arise. I consider that the Proposed Scheme has demonstrated that it will contribute to the reduction in emissions and improve the efficiency of people movement throughout the city. Accordingly, I am satisfied that the Proposed Scheme is in accordance with the proper planning and sustainable development of the area, subject to compliance with the mitigation measures set out and conditions attached in my recommendation below.

7.0 Appropriate Assessment

7.1. Consideration of the Likely Significant Effects on a European Site

Article 6(3) of the Habitats Directive

7.2. The requirements of Article 6(3) as related to appropriate assessment of a project under part XAB are considered fully in this section. The areas addressed in this section are as follows:

- The Natura Impact Statement

- Screening for appropriate assessment
- Appropriate assessment of implications of the proposed development on the integrity of each European site.

The Natura Impact Statement and Supplemental Information

- 7.3. The application is accompanied by an AA Screening report and an NIS (2023) which describes the proposed development, the project area and the surrounding area. The construction management plan is also a key document in terms of the implementation of mitigation measures.
- 7.4. All ecology and Appropriate Assessment related documents have been prepared by staff ecologists from Scott Cawley and informed by desk study including reference material from the NPWS website and data base and by field surveys.
- 7.5. A description of all baseline surveys is outlined within section 4.6 of the NIS. The following is a list of surveys undertaken:
- Habitats, Flora and Fauna surveys, were carried out in June and August 2018, in August and October 2020 and again in May and August 2022.
 - Otter surveys were undertaken between June and August 2018, and in August 2020, as well as follow on surveys in February 2021 and March 2022.
 - Wintering Bird surveys - February to March 2020, October to April 2021 and October 2022 to March 2023. Vantage Point surveys were also carried out at the proposed Dodder Bridge - March and April 2018, March and April 2019, November 2020 to April 2021, October 2021 to April 2022, and October 2022 to March 2023.
 - A desk study, October 2020, identified three suitable sites along or adjacent to the Proposed Scheme with potential for wintering birds that would be subject to direct habitat loss or disturbance. Bushy Park, Dodder View Road / Church Lane and Dodder View Road and adjacent to Rathdown Park. These sites were surveyed twice a month, between the months February and March 2020 and again between October 2020 to March 2021. Additional surveys were carried out twice monthly at Green space located between Church Lane and Dodder View Road, adjacent to Bushy Park Carpark and the green space located between River Dodder and Dodder View Road, adjacent to Pearse Bridge

between the months October 2021 and March 2022. The results of the desk study and field surveys have informed the assessment of potential impacts on wintering bird species arising from the Proposed Scheme.

- In general, the approach was a 'look-see' methodology (based on Gilbert et al. 1998). All birds present within a site were identified with reference to Collins Bird Guide (Svensson, 2009) to confirm identification (where necessary), and were recorded using the British Trust for Ornithology (BTO) species codes. The total flock size of birds present, their general location within the site and any activity exhibited were also recorded. Evidence of bird droppings were recorded at pre-defined transect lines. The length of the transect line varied per site. Transect lines were only completed at sites where no bird species were present, to avoid any potential disturbance.

- Kingfisher surveys were carried out in September 2020 as well as, follow on surveys, in March / April 2022.
- Aquatic habitat surveys were carried out in 2020 at a number of locations, namely CBC1012 AR001 along the River Dodder at Rathdown Park, along the Owenadoher River at Rathfarnham Mill CBC1012AR002 as well as upstream survey sites on the Owenadoher River at CBC1012AR004 and CBC1012AR003.

7.6. The receiving environment is described in line with standard methodology (Fossitt 2000) and results of the field surveys are presented in NIS Section 5 and considered further in my assessment below.

7.7. Ten areas of Japanese knotweed, Himalayan balsam and three-cornered garlic, species listed on the Third Schedule of the (Birds and Natural Habitats) Regulations 2011 (as amended), are present within close proximity of the Proposed Scheme. Locations set out in Table 4 'Non-native invasive plant species listed on the Third Schedule of the Birds and Habitats Regulations 2011 recorded along or adjacent to the Proposed Scheme' of the NIS include: along the River Dodder at Pearse Bridge in Rathfarnham adjacent to the western & eastern side of Pearse Bridge, on the northern bank of River Dodder, along River Dodder edge at Austin Clarke Bridge, along the banks of the Owenadoher River, along the River Dodder beside Bushy Park pond and on southern bank of the River Dodder.

- 7.8. No records of any Annex II plant species were recorded within the footprint of the proposed scheme during field surveys.
- 7.9. Signs of otter, an Annex II and IV mammal species, were recorded during multidisciplinary field surveys of the Proposed Scheme, on the River Dodder and the Owenadoher River (where a confirmed holt was identified). Further surveys at likely watercourses supporting otter activity (based on desktop research) and assessment of watercourse condition (culverted, supporting habitat, feed potential) returned a number of records for otter activity. The nearest SAC to the Proposed Scheme for which otter has been designated is Wicklow Mountains SAC which is located approximately 6.2km upstream, within the same WFD sub-catchment.
- 7.10. As stated above wintering bird surveys were carried out at three locations for the Proposed Scheme between November 2020 and March 2021 on a fortnightly basis (see Figure 5 of the NIS report). Species recorded included herring gull, black-headed gull and grey heron. Wintering bird activity was low across all visits. A review of a study into light-bellied Brent goose inland feeding sites has identified one ex-situ wintering bird feeding site in the footprint of the Proposed Scheme, namely Tymon Park. There are no inland wintering bird feeding sites within approximately 300m of the Proposed Scheme i.e. the disturbance Zol. However, there are at least three that are within 1km of the Proposed Scheme as follows:
- Eamon Ceannt Park;
 - St Mary's College RFC; and,
 - Templeogue College.
- 7.11. A number of SPAs have been included on a precautionary basis for assessment as it cannot with certainty be confirmed that their Special Conservation Interest species do not use areas in the vicinity of the Proposed Scheme as ex-situ habitat.
- 7.12. Although no signs of kingfisher were recorded during field surveys of the Proposed Scheme, kingfisher, an Annex I bird species, is known to be present within 1Km, in the wider study area, in particular, along the River Dodder and the Grand Canal.
- 7.13. The Proposed Scheme crosses a total of three of watercourses: the Grand Canal, and the River Dodder twice. The Proposed Scheme is also hydrologically connected to Dublin Bay via the River Dodder (Dodder_040 and _050), Owenadoher River (Owenadoher _010), Grand Canal and Liffey Estuary Upper and Lower, as well as

Ringsend WwTP including London Bridge pumping station. The Proposed Scheme lies within the Dodder_SC_010 WFD subcatchment. The River Dodder flows in a north easterly direction through south Co. Dublin, discharging to the River Liffey at Grand Canal Dock in Dublin city.

- 7.14. **The Proposed Scheme does not overlap with any European site.** The Proposed Scheme is hydrologically connected to Dublin Bay via the receiving surface water network. **The nearest European sites in Dublin Bay are South Dublin Bay and River Tolka Estuary SPA and South Dublin Bay SAC, which are located approximately 3.2km downstream of the closest point of the Proposed Scheme to the Liffey Estuary Upper. The Proposed Scheme is also hydrologically connected to the Wicklow Mountains SAC (via the River Dodder and the Owenadoher River), located approximately 6.1km upstream from the Proposed Scheme.** Dublin Bay contains nine European sites which are downstream of the Proposed Scheme: (one of which has been added as a candidate SPA after the submission of this application, namely the North West Irish Sea cSPA. This site will be assessed in conjunction with the other eight referred to within the NIS submitted). These sites include South Dublin Bay SAC, North Dublin Bay SAC, Howth Head SAC, Rockabill to Dalkey Island SAC, Dalkey Islands SPA, Howth Head Coast SPA, North Bull Island SPA and South Dublin Bay and River Tolka SPA. European sites will be hydrologically connected to the Proposed Scheme via the River Dodder, the Owenadoher River, the Grand Canal, the Liffey Estuary Upper, the Liffey Estuary Lower and Ringsend Wastewater Treatment Plant.
- 7.15. In addition, Wicklow Mountains SAC is located upstream of the Proposed Scheme and is hydrologically connected to the Proposed Scheme via the Dodder_050. 83 There are nine SPAs designated for SCI species that are known to forage and / or roost at inland sites across Dublin City and / or utilise Dublin Bay. These include South Dublin Bay and River Tolka SPA, North Bull Island SPA, Baldoyle Bay SPA, Rogerstown Estuary SPA, Skerries Islands SPA, Ireland's Eye SPA, Lambay Island SPA, Malahide Estuary SPA, and The Murrough SPA. In addition, Rockabill to Dalkey Island SAC and Lambay Island SAC are designated for mobile QI species known to utilise the Dublin Bay and the Liffey Estuary Lower. The European sites present in the vicinity of the Proposed Scheme are shown in Figure 4 of the NIS and listed in Table 3, along with their Qualifying Interests(QIs)/ Special Conservation Interests (SCIs) and proximity to the Proposed Scheme.

- 7.16. The Proposed Scheme has the potential to affect the receiving environment and, as a result, the conservation objectives supporting the Qualifying Interest / Special Conservation Interests of the following European sites: North Dublin Bay SAC; South Dublin Bay SAC; Rockabill to Dalkey Island SAC; Lambay Island SAC; Wicklow Mountains SAC, Howth Head Coast SPA; Dalkey Islands SPA; Rockabill SPA; North Bull Island SPA; South Dublin Bay and River Tolka Estuary SPA; Ireland's Eye SPA; Malahide Estuary SPA; Baldoyle Bay SPA; Rogerstown Estuary SPA; Skerries Islands SPA; Lambay Island SPA; and The Murrough SPA. The potential impacts of the Proposed Scheme on the receiving environment, their zone of influence, and the European sites at risk of likely significant effects are summarised in Table 8. 'Summary of the potential impacts of the Proposed Scheme on the receiving environment, their potential zone of influence, and the European sites within the zone of influence', of the submitted NIS.
- 7.17. Details on the water quality of each watercourse, as sourced from the Environmental Protection Agency (EPA), and the distances from the proposed crossing point to downstream waterbodies are also provided in Table 7.
- 7.18. The scientific assessment to inform AA is presented in sections 5 -7 of the NIS and in the documentation submitted to the Board as part of the application. The conservation objectives of the various qualifying interest features and special conservation interest species are listed. Impact pathways are identified and the assessment of likely significant effects which could give rise to adverse effects on site integrity presented in Tables 2-8.
- 7.19. Mitigation measures are presented from section 7.1.4 of the NIS onwards under each site heading and detailed in full in the Construction Management Plan (CMP) and Invasive Species Management plan. An assessment of potential in-combination effects is presented in Section 9 of the NIS.
- 7.20. The NIS together with supplemental information concludes that, following an examination, analysis and evaluation of the relevant information, including the nature of the predicted effects from the proposed development, and mitigation measures to avoid such effects, that the proposed development will not adversely affect the integrity of any European site, either alone or in combination with other plans and projects.**

Adequacy of information submitted by the applicant.

- 7.21. Having reviewed the NIS and supplemental information that accompanies the application, I am satisfied that there is adequate information to undertake Screening and Appropriate Assessment of the proposed Templeogue / Rathfarnham to City Centre CBC scheme on lands comprised of two main alignments, namely from Templeogue to Terenure (3.7km), and from Rathfarnham to the City Centre (6.3km), all in County Dublin within Dublin City Council and South Dublin County Council administrative areas.
- 7.22. I am satisfied that all possible European Sites that could in anyway be affected have been considered by the Applicant.
- 7.23. I am satisfied that all ecological survey work and reporting has been undertaken and prepared by competent experts in line with best practice and scientific methods. Information on the competencies and professional memberships of the Ecological team are provided in the NIS. I am also satisfied that all potential impact mechanisms have been considered and appropriately assessed within the NIS document.

Screening for Appropriate Assessment

- 7.24. The first test of Article 6(3) is to establish if the proposed development could result in likely significant effects to a European site, in which case the development is 'screened in' for further detailed assessment- appropriate assessment (stage 2).
- 7.25. The screening assessment undertaken on behalf of the applicant concluded that the potential for significant effects could not be ruled out for **17 no. European Sites** within the Dublin area in view of the conservation objectives of those sites and thus the proposed development must proceed to (stage 2) Appropriate Assessment, and an NIS prepared to inform this stage. Given the location of the new candidate SPA mentioned above adjacent to these 17 sites I have included this site within my screening for Appropriate Assessment.
- 7.26. I note that in determining the potential significant effects of the proposed development, the applicant took account of the potential for ex-situ effects for foraging birds and mammals such as Otter. It is of note that a precautionary approach has been taken in including SAC and SPA sites in the wider area in the screening exercise. Given that bird species can travel up to 20km from designated sites and that territories range for

male otters is 21 Km, the applicant has included sites at some remove from the proposed development site.

7.27. Similarly, a precautionary approach has been taken in relation to SCIs associated with SACs in the wider area. Potential impacts and effects considered are presented in Table 1.

Table 1. Summary of the potential impacts of the Proposed Scheme on the receiving environment, their potential zone of influence, and the European sites within the zone of influence (based on applicant's assessment with consideration added for North West Irish Sea cSPA).

Potential impacts and zone of influence of effects	European sites within Zone of Influence
<p>Habitat loss and Fragmentation</p> <p>No European sites are at risk of direct habitat loss impacts. There is potential for loss of ex situ inland feeding sites used by SCI wintering bird species.</p>	<p>Yes</p> <p>There are European sites at risk of ex-situ habitat losses:</p> <p>Malahide Estuary SPA, Baldoyle Bay SPA, Rogerstown Estuary SPA, North Bull Island SPA, South Dublin Bay and River Tolka SPA, Skerries Islands SPA, Lambay Island SPA, Ireland's Eye SPA and The Murrough SPA; North West Irish Sea cSPA</p>
<p>Habitat degradation/ effects on QI/SCI species as a result of hydrological impacts:</p> <p>Habitats and species downstream of the Proposed Scheme and the associated surface water drainage discharge points, and downstream of offsite wastewater treatment plants</p>	<p>Yes</p> <p>There are European sites at risk of hydrological effects associated with the Proposed Scheme:</p> <p>Wicklow Mountains SAC, North Dublin Bay SAC, South Dublin Bay SAC, Howth Head Coast SPA, Rockabill to Dalkey Island SAC, Lambay Island SAC, North Bull Island SPA,</p>

	<p>South Dublin Bay and River Tolka Estuary SPA, Baldoyle Bay SPA, Ireland's Eye SPA, Skerries Islands SPA, Rockabill SPA, Lambay Island SPA, Malahide Estuary SPA, Rogerstown Estuary SPA, Dalkey Islands SPA and The Murrough SPA North West Irish Sea cSPA</p>
<p>Habitat degradation as a result of hydrogeological impacts: Groundwater-dependant habitats, and the species those habitats support, in the local area that lie downgradient of the Proposed Scheme.</p>	<p>No There are no European sites at risk of hydrogeological effects associated with the Proposed Scheme</p>
<p>Habitat degradation as a result of introducing/spreading non-native invasive species: Habitat areas within, adjacent to, and potentially downstream of the Proposed Scheme</p>	<p>Yes Although no non-native invasive species were recorded during field surveys, there are records of non-native invasive species present within or adjacent to the Proposed Scheme and, therefore, a risk associated with the Proposed Scheme to downstream European sites from the spread/introduction of non-native invasive species to: South Dublin Bay and River Tolka Estuary SPA, South Dublin Bay SAC, North Dublin Bay SAC North Bull Island SPA and North West Irish Sea cSPA</p>
<p>Air quality impacts Potentially up to 200m from the Proposed Scheme boundary: Potentially up to 50m from the Proposed Scheme boundary and 500m from the Construction Compound at Construction phase, and up to 200 metres at Operation Phase.</p>	<p>No. There are no European sites at risk of air quality effects associated with the Proposed Scheme</p>
<p>Disturbance and displacement impacts:</p>	<p>Yes,</p>

<p>Potentially up to several hundred metres from the Proposed Scheme, dependent upon the predicted levels of noise, vibration and visual disturbance associated with the Proposed Scheme, taking into account the sensitivity of the qualifying interest species to disturbance effects</p>	<p>There are no European sites within the potential zone of influence of disturbance effects associated with the construction or operation of the Proposed Scheme.</p> <p>However, there are 3 of ex-situ inland feeding site which are utilised by SCI wintering bird species within the potential disturbance Zol of the Proposed Scheme.</p> <p>In addition, otter in the vicinity of the Dodder River and Owenadoher River in proximity to the Proposed Scheme may be associated with the QI population associated with Wicklow Mountains SAC and impacts on the QI population cannot be excluded as a result.</p> <p>Wicklow Mountains SAC, Malahide Estuary SPA, Baldoyle Bay SPA, Rogerstown Estuary SPA, North Bull Island SPA, South Dublin Bay and River Tolka SPA, Skerries Islands SPA, Ireland's Eye SPA, Lambay Island SPA North West Irish Sea cSPA and The Murrough SPA</p>
---	---

Screening Determination (recommendation)

7.28. Having regard to the information presented in the AA Screening Report, NIS, submissions, the nature, size and location of the proposed development and its likely direct, indirect and cumulative effects, the source pathway receptor principle and sensitivities of the ecological receptors, I concur with the applicant's screening

determination that there is potential for significant effects on the following European sites:

- North Dublin Bay SAC,
- South Dublin Bay SAC,
- Rockabill to Dalkey Island SAC,
- Lambay Island SAC,
- Wicklow Mountains SAC,
- South Dublin Bay and River Tolka Estuary SPA,
- North Bull Island SPA,
- Howth Head Coast SPA,
- Dalkey Islands SPA,
- Rockabill SPA,
- Baldoyle Bay SPA,
- Malahide Estuary SPA,
- Rogerstown Estuary SPA,
- Skerries Islands SPA,
- Ireland's Eye SPA,
- Lambay Island SPA and,
- The Murrough SPA.
- North West Irish Sea cSPA,

7.29. Following an examination, analysis and evaluation of all relevant information, in view of best scientific knowledge, and applying the precautionary principle, it is reasonable to concluded that there is the possibility for significant effects on the following European sites, in the absence of mitigation, either arising from the project alone or in combination with other plans and projects, as a result of habitat loss / fragmentation, hydrological impacts, non-native invasive species, and disturbance and displacement impacts. As screening is considered a pre-assessment stage, further analysis is required to determine the significance of such impacts and to apply any mitigation measures to exclude adverse effects. Therefore, South Dublin Bay SAC, North Dublin Bay SAC, Rockabill to Dalkey Island SAC, Wicklow Mountains SAC, Lambay Island SAC, Howth Head Coast SPA, South Dublin Bay and River

Tolka Estuary SPA, North Bull Island SPA, Malahide Estuary SPA, Baldoyle Bay SPA, Rogerstown Estuary SPA, Skerries Islands SPA, Ireland's Eye SPA, Rockabill SPA, Lambay Island SPA, Dalkey Islands SPA, The Murrrough SPA and North West Irish Sea cSPA are brought forward for inclusion in the Stage 2 AA. Above-listed 18 no. European sites (5 no. SACs and 13no. SPAs)

Appropriate Assessment (recommendation)

7.30. The following is an objective assessment of the implications of the proposal on the relevant conservation objectives of the European sites based on the scientific information provided by the applicant and taking into account expert opinion and submissions on nature conservation. It is based on an examination of all relevant documentation and submissions, analysis and evaluation of potential impacts, findings conclusions. A final determination will be made by the Board.

7.31. All aspects of the project which could result in significant effects are assessed and mitigation measures designed to avoid or reduce any adverse effects on site integrity are examined and evaluated for effectiveness. I have relied on the following guidance:

- DoEHLG (2009). Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities. Department of the Environment, Heritage and Local Government, National Parks and Wildlife Service, Dublin
- EC (2018) Managing Natura 2000 sites. The provisions of Article 6 of the Habitats Directive 92/43/EEC
- EC (2021) Assessment of plans and projects in relation to Natura 2000 sites. Methodological guidance on Article 6(3) and 6(4) of the Habitats Directive 92/43/EC.

Relevant European sites:

7.32. In the absence of mitigation or further detailed analysis, the potential for significant effects could not be excluded for:

- North Dublin Bay SAC,
- South Dublin Bay SAC,
- Howth Head SAC,
- Rockabill to Dalkey Island SAC,
- Lambay Island SAC,

- Wicklow Mountains SAC,
- South Dublin Bay and River Tolka Estuary SPA,
- North Bull Island SPA,
- Howth Head Coast SPA,
- Dalkey Islands SPA,
- Rockabill SPA,
- Baldoyle Bay SPA,
- Malahide Estuary SPA,
- Rogerstown Estuary SPA,
- Skerries Islands SPA,
- Ireland's Eye SPA,
- Lambay Island SPA and,
- The Murrough SPA.
- North West Irish Sea cSPA,

7.33. A description of the sites and their Conservation Objectives and Qualifying Interests/Special Conservation Interests, including relevant attributes and targets for these sites, are set out in the NIS section 7- Assessment of Potential Effects.

7.34. I have also examined the Conservation Objectives Supporting Documents for these sites, available through the NPWS website (www.npws.ie).

7.35. In consideration of the fact that both Baldoyle Bay SAC and Ireland's Eye SAC are not listed within the NIS as European Sites that have the potential to be impacted, but have I note been included in the NIS for other CBC projects which drain directly into Dublin Bay, I wish to clarify as follows. I have considered these two sites, their QI's, the source pathway receptor principle, as well as the likely direct, indirect and cumulative effects of the Proposed Scheme and have concluded that the potential for significant effects arising on either of these sites does not arise, specifically due to the nature of the QI's of the sites, their separation distances from the Proposed Scheme, their locations (on the opposite side of Howth Head) and the lack of direct hydrological links. I agree with the AA screening by the applicant that further analysis is not required to determine the significance of such impacts and to apply any mitigation measures to exclude adverse effects. Therefore, only the sites listed above in 7.28 of this report are brought forward for further assessment.

7.36. Tables 2-7 below summarise the information considered for the Appropriate Assessment and site integrity test. I have taken this information from that provided by the applicant within the NIS. I expand on certain issues further in my report.

Table 2: AA summary matrix for North Dublin Bay SAC

North Dublin Bay SAC [000206]			
Detailed Conservation Objectives available: ConservationObjectives.rdl (npws.ie)			
Summary of Appropriate Assessment			
Special Conservation Interest (SCI)	Conservation Objectives Targets and attributes (summary- inserted)	Potential adverse effects	Mitigation measures
Mudflats and sandflats not covered by seawater at low tide	To maintain the favourable conservation condition of Mudflats and sandflats not covered by seawater at low tide in North Dublin Bay SAC. Maintain the extent of the <i>Mytilus edulis</i> -dominated community. Conserve the high quality of the <i>Mytilus edulis</i> -dominated community, subject to natural processes. Conserve the communities of fine sand to sandy mud with <i>Pygospio elegans</i> and <i>Crangon crangon</i> community complex; Fine sand with <i>Spio martinensis</i> community complex in a natural condition.	The release of contaminated surface water run-off or an accidental pollution event during construction or operation could affect surface water downstream in Dublin Bay.	Detailed pollution control measures to protect water quality are outlined within section 7.1.4 and include but are not limited to the use of silt fences, silt curtains, settlement lagoons and filter materials. Provision of exclusion zones and barriers (e.g. silt fences) between earthworks, stockpiles and temporary surfaces to prevent sediment washing into the existing drainage systems and hence the downstream receiving water environment.
Annual vegetation of drift lines	Restore the favourable conservation condition in relation to habitat - extent/structure/distribution/ composition. Maintain presence of sea rocket (<i>Cakile maritima</i>), sea sandwort (<i>Honckenya peploides</i>), prickly saltwort (<i>Salsola kali</i>) and oraches (<i>Atriplex</i> spp.)		Provision of temporary construction surface drainage and sediment control measures to be in place before earthworks commence.
Salicornia and other annuals colonising mud and sand	Restore the favourable conservation condition in relation to habitat - extent/vegetation structure/distribution/ Composition/variation and no significant expansion of common cordgrass.		Fuels to be stored in bunded areas, management of

Atlantic salt meadows (Glaucopuccinellietalia maritimae)	To maintain the favourable conservation condition in relation to habitat, community, extent/vegetation structure of habitat & physical structure /distribution		construction related traffic etc. Implementation of SUDs when complete to control run off during the operation of the scheme.
Mediterranean salt meadows (Juncetalia maritimi)			
Embryonic shifting dunes	To restore the favourable conservation condition in relation to habitat – area/distribution/physical structure/vegetation structure and composition.	The introduction and/or spread of invasive species to downstream European sites could potentially result in the degradation of existing habitats present, in particular coastal habitats not permanently or regularly inundated by seawater. These species may outcompete other native species present, negatively impacting the species composition, diversity and abundance and the physical structural integrity of the habitat.	See the mitigation measures described in Section 7.1.4 to prevent the introduction and/or spread of invasive species which includes the carrying out of preconstruction surveys and the implementation of an Invasive Species management plan. See the mitigation measures described in Section 7.1.4 for site specific measures for Construction Compounds TR3 and TR6. Silt curtains / soil 'bunds' or infiltration trenches will be installed and maintained.
Shifting dunes along the shoreline with Ammophila arenaria (white dunes)			
Fixed coastal dunes with herbaceous vegetation (grey dunes)			
Humid dune slacks			
Petalophyllum ralfsii (Petalwort)	To maintain the favourable conservation condition in relation to distribution/ population size/ habitat / hydrological conditions/ vegetation structure.		

Overall conclusion: Integrity test

The applicant determined that following the implementation of mitigation, the construction and operation of this proposed development alone or in combination with other plans and projects will not adversely affect the integrity of this European site.

Based on the information provided, I am satisfied that adverse effects can be excluded for North Dublin Bay SAC. No wetland habitat loss will occur. Adverse effects from water contamination and sediment release can be effectively prevented by mitigation measures ensuring the protection of the River Dodder, Owenadoher River, Grand Canal, Liffey Estuary Upper, Liffey Estuary Lower and existing surface water pipes which drain directly into Dublin Bay. No increase in existing runoff rates will occur and appropriate treatment will ensure runoff quality.

The spread of invasive species can also be controlled via mitigation measures, pre confirmatory surveys will be carried out in order to avoid or adequately treat or remove invasive plants prior to construction being carried out in accordance with the Invasive Species Management Plan appended to the NIS.

Based on the information submitted, surveys carried out analysis provided I am satisfied that no uncertainty remains.

The proposed development would not delay or prevent the attainment of the Conservation objectives of the North Dublin Bay SAC.

Table 3: AA summary matrix for South Dublin Bay SAC

South Dublin Bay SAC [000210]			
Detailed Conservation Objectives available: ConservationObjectives.rdl (npws.ie)			
Summary of Appropriate Assessment			
Qualifying Interest feature	Conservation Objectives Targets and attributes (summary- inserted)	Potential adverse effects	Mitigation measures
	Maintain favourable conservation condition	<p>An accidental pollution event during construction or operation could affect surface water downstream in Dublin Bay.</p> <p>An accidental pollution event of a sufficient magnitude, either alone or cumulatively with other pollution sources, could affect the quality of the intertidal habitats and the fauna communities they support.</p>	<p>Detailed pollution control measures to protect water quality are outlined within section 7.1.4. and include but are not limited to the use of silt fences, silt curtains, settlement lagoons and filter materials.</p> <p>Provision of exclusion zones and barriers (e.g. silt fences) between earthworks, stockpiles and temporary surfaces to prevent sediment washing into the existing drainage systems and hence the downstream receiving water environment.</p> <p>Provision of temporary construction surface drainage and sediment control measures to be in place before earthworks commence.</p> <p>Fuels to be stored in bunded areas, management of construction related traffic.</p> <p>See the mitigation measures</p>
Mudflats and sandflats not covered by seawater at low tide	Maintain favourable conservation condition in relation to habitat area, community extent/vegetation structure/distribution including <i>Zostera</i> dominated community and fine sands with <i>Angulus tenuis</i>		
Annual vegetation of drift lines	Restore favourable conservation condition in relation to habitat area, distribution, physical structure, vegetation structure and composition		
Salicornia and other annuals colonising mud and sand	Restore favourable conservation condition in relation to habitat area, distribution, physical structure, vegetation structure and composition		
Embryonic shifting dunes	Restore favourable conservation condition in relation to habitat area, distribution, physical structure, vegetation structure and composition		

		<p>Spread of invasive species could potentially result in the degradation of existing habitats present, in particular coastal habitats not permanently or regularly inundated by seawater. These species may outcompete other native species present, negatively impacting the species composition, diversity and abundance and the physical structural integrity of the habitat.</p>	<p>described in Section 7.1.4 for site specific measures for Construction Compounds TR3 and TR6. Silt curtains / soil 'bunds' or infiltration trenches will be installed and maintained.</p> <p>See the mitigation measures described in Section 7.1.4 to prevent the introduction and/or spread of invasive species which includes the carrying out of preconstruction surveys and the implementation of an Invasive Species management plan.</p> <p>Implementation of SUDs when complete to control run off during the operation of the scheme.</p>
--	--	---	---

Overall conclusion: Integrity test

The applicant determined that following the implementation of mitigation, the construction and operation of this proposed development alone or in combination with other plans and projects will not adversely affect the integrity of this European site.

Based on the information provided, I am satisfied that adverse effects can be excluded for South Dublin Bay SAC. No wetland habitat loss will occur. Adverse effects from water contamination and sediment release can be effectively prevented by mitigation measures ensuring the protection of the River Dodder, Owenadoher River, Grand Canal, Liffey Estuary Upper, Liffey Estuary Lower and existing surface water pipes which drain directly into Dublin Bay. No increase in existing runoff rates will occur and appropriate treatment will ensure runoff quality. The spread of invasive species can also be controlled via mitigation measures, pre confirmatory surveys will be carried out in order to avoid or adequately treat or remove invasive plants prior to construction being carried out in accordance with the Invasive Species Management Plan appended to the NIS.

Based on the information submitted, surveys carried out analysis provided I am satisfied that no uncertainty remains.

The proposed development would not delay or prevent the attainment of the Conservation objectives of the South Dublin Bay SAC.

Table 4: AA summary matrix for Rockabill to Dalkey Island SAC

Rockabill to Dalkey Island SAC [003000]

Detailed Conservation Objectives available: [ConservationObjectives.rdl \(npws.ie\)](#)

Summary of Appropriate Assessment

Qualifying Interest feature	Conservation Objectives Targets and attributes (summary- inserted)	Potential adverse effects	Mitigation measures
Reefs	Maintain favourable conservation condition in relation to habitat area, distribution and community structure.	An accidental pollution event during construction or operation could affect surface water downstream in Dublin Bay. An accidental pollution event of a sufficient magnitude, either along or cumulatively with other pollution sources, could potentially affect the quality (vegetation structure and composition) and area/distribution of intertidal/coastal habitats.	Detailed pollution control measures to protect water quality are outlined within section 7.1.4 and include but are not limited to: the use of silt fences, silt curtains, settlement lagoons and filter materials. Provision of exclusion zones and barriers (e.g. silt fences) between earthworks, stockpiles and temporary surfaces to prevent sediment washing into the existing drainage systems and hence the downstream receiving water environment. Provision of temporary construction surface drainage and sediment control measures to be in place before earthworks commence.
Harbour porpoise <i>Phocoena phocoena</i>	Maintain favourable conservation condition in relation to access to suitable habitat and prevention of disturbance by human activity.	Pollution event could potentially affect the quality of the intertidal /marine habitats which support harbour porpoise and fish prey species.	Fuels to be stored in bunded areas, management of construction related traffic etc. Implementation of SUDs when complete to control run off during the operation of the scheme.

Overall conclusion: Integrity test

The applicant determined that following the implementation of mitigation measures the construction and operation of this proposed development alone or in combination with other plans and projects will not adversely affect the integrity of this European site.

Based on the information provided, I am satisfied that adverse effects can be excluded for Rockabill to Dalkey Island SAC. No habitat loss will occur. Adverse effects from water contamination and sediment release can be effectively prevented by mitigation measures ensuring the protection of the River Dodder, Owenadoher River, Grand Canal, Liffey Estuary Upper, Liffey Estuary Lower and existing surface water pipes which drain directly into Dublin Bay. No increase in existing runoff rates will occur and appropriate treatment will ensure runoff quality.

Based on the information submitted, surveys carried out analysis provided I am satisfied that no uncertainty remains.

The proposed development would not delay or prevent the attainment of the Conservation objectives of the Rockabill to Dalkey Island SAC.

Table 5 AA Summary matrix for Lambay Island

Lambay Island SAC [000204] Detailed Conservation Objectives available: ConservationObjectives.rdl (npws.ie)				
Summary of Appropriate Assessment				
Qualifying feature	Interest	Conservation Objectives Targets and attributes (summary- inserted)	Potential adverse effects	Mitigation measures
Reefs		To maintain favourable conservation condition in relation to habitat area/distribution/community complex and subtidal reef community complex in natural condition.	No pathway for impacts to occur on any habitats associated with this SAC as it is located a significant distance from the proposed scheme on the far side of the Howth peninsula and separated by a large marine waterbody.	None.
Vegetated sea cliffs of the Atlantic and Baltic coast.		To maintain favourable conservation condition in relation to habitat length; no decline in habitat distribution; no alteration to natural functioning of geomorphological and hydrological processes; maintain range of sea cliff habitat zonations; maintain structural variation within sward; maintain range of Irish Sea Cliff Survey species; negative indicator species less than 5%; and cover of bracken and woody species on grassland/heath less than 10% and 20% respectively	As Above	

<p>Halichoerus grypus (Grey Seal)</p>	<p>No restriction of species range by artificial barriers to site use; breeding, moulting and resting haul-out sites maintained in natural condition; and human activities should occur at levels that do not adversely affect the species at the site.</p>	<p>Pollution event could potentially affect the quality of the intertidal /marine habitats which support grey seal and harbour seal.</p>	<p>Detailed pollution control measures to protect water quality are outlined within section 7.1.4 and include but are not limited to the use of silt fences, silt curtains, settlement lagoons and filter materials.</p>
<p>Phoca vitulina (Harbour Seal)</p>	<p>No restriction of species range by artificial barriers to site use; breeding, moulting and resting haul-out sites maintained in natural condition; and human activities should occur at levels that do not adversely affect the species at the site.</p>	<p>As Above</p>	<p>Provision of exclusion zones and barriers (e.g. silt fences) between earthworks, stockpiles and temporary surfaces to prevent sediment washing into the existing drainage systems and hence the downstream receiving water environment.</p> <p>Detailed pollution control measures to protect water quality are outlined within section 7.1.4 and include but are not limited to: the use of silt fences, silt curtains, settlement lagoons and filter materials.</p> <p>Provision of exclusion zones and barriers (e.g. silt fences) between earthworks, stockpiles and temporary surfaces to prevent sediment washing into the existing</p>

			drainage systems and hence the downstream receiving water environment.
<p>Overall conclusion: Integrity test</p> <p>The applicant determined that following the implementation of mitigation measures the construction and operation of this proposed development alone or in combination with other plans and projects will not adversely affect the integrity of this European site.</p> <p>Based on the information provided, I am satisfied that adverse effects can be excluded for Lambay Island SAC. No habitat loss will occur. Adverse effects from water contamination and sediment release can be effectively prevented by mitigation measures ensuring the protection of the River Dodder, Owenadoher River, Grand Canal, Liffey Estuary Upper, Liffey Estuary Lower and existing surface water pipes which drain directly into Dublin Bay. No increase in existing runoff rates will occur and appropriate treatment will ensure runoff quality.</p> <p>Based on the information submitted, surveys carried out analysis provided I am satisfied that no uncertainty remains.</p> <p>The proposed development would not delay or prevent the attainment of the Conservation objectives of the Lambay Island SAC.</p>			

Table 6: AA summary matrix for Wicklow Mountains SAC

Wicklow Mountains SAC [002122]			
Detailed Conservation Objectives available: ConservationObjectives.rdl (npws.ie)			
Summary of Appropriate Assessment			
Qualifying Interest feature	Conservation Objectives Targets and attributes (summary-inserted)	Potential adverse effects	Mitigation measures
<p>Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae)</p> <p>Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or Isoeto-Nanojuncetea</p>	<p>To maintain favourable conservation condition in relation to habitat area and community distribution; Maintain soil nutrient status within natural range; maintain variety of vegetation communities;</p>	<p>Qualifying Interest habitats for which this SAC has been designated are not at risk of effects arising from the Proposed Scheme as the SAC is located upstream of the proposed scheme.</p>	<p>None</p>

<p>Natural dystrophic lakes and ponds</p> <p>Northern Atlantic wet heaths with <i>Erica tetralix</i></p> <p>European dry heaths</p> <p>Alpine and Boreal heaths</p> <p>Calaminarian grasslands of the <i>Violetalia calaminariae</i></p> <p>Species-rich <i>Nardus</i> grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe)*</p> <p>Blanket bogs (* if active bog)</p> <p>Siliceous scree of the montane to snow levels (<i>Androsacetalia alpinae</i> and <i>Galeopsietalia ladani</i>)</p> <p>Calcareous rocky slopes with chasmophytic vegetation</p> <p>Siliceous rocky slopes with chasmophytic vegetation</p> <p>Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles</p>	<p>maintain adequate open ground; and maintain diversity and populations of metallophyte bryophytes.</p>		
<p>Otter <i>Lutra lutra</i></p>	<p>To maintain the favourable conservation condition of Otter</p>	<p>As the Proposed Scheme is hydrologically connected to the Dodder_050, as well as the Owenadoher River, the Grand Canal as well as the Liffey Estuary Upper and Lower as well as a</p>	<p>Detailed pollution control measures to protect water quality are outlined within section 7.1.4 and include but are not limited to the</p>

		<p>network of interconnecting and established surface or combined sewer / surface water pipes, there is potential for impacts to occur on otter populations (a mobile species) associated with the Wicklow Mountains SAC.</p> <p>The release of contaminated surface water runoff and / or an accidental spillage or pollution event into watercourses during Construction, or Operation, has the potential to affect water quality in the receiving aquatic environment.</p> <p>Noise, vibration and increased works, with the proposed construction, particularly if required at night-time (around existing bridges crossing watercourses) which otter utilise could potentially result in negative impacts to QI otter populations through disturbance/displacement impacts.</p>	<p>use of silt fences, silt curtains, settlement lagoons and filter materials.</p> <p>Confirmatory pre-construction check of all suitable otter habitat will be completed within 12 months prior to any construction works commencing.</p> <p>To protect otters from indirect harm during construction, where practicable open excavations will be covered when not in use and backfilled as soon as practicable by the appointed contractor.</p> <p>Excavations will also be covered at night, where practicable, and any deep excavations which must be left open will have appropriate egress ramps in place to allow mammals to safely exit should they fall in.</p> <p>Fencing requirements as per the Guidelines for the Treatment of Otters Prior to the Construction of National Road Schemes (NRA, 2006b) will be erected around the Construction Compounds and other working areas which are in close proximity to significant watercourses and have suitable roaming territory for otter.</p> <p>Security lighting at the Construction Compounds or in active works areas in close proximity to watercourses with known otter activity will be designed in conjunction with a suitably qualified ecologist to minimise light spill.</p>
--	--	--	--

			<p>Excavations will also be covered at night, where practicable, and any deep excavations which must be left open will have appropriate egress ramps in place to allow mammals to safely exit should they fall in.</p> <p>Fencing requirements as per the Guidelines for the Treatment of Otters Prior to the Construction of National Road Schemes (NRA, 2006) will be erected around the Construction Compound and other working areas which are in close proximity to significant watercourses and have suitable roaming territory for otter.</p>
--	--	--	--

Overall conclusion: Integrity test

The applicant determined that following the implementation of mitigation measures the construction and operation of this proposed development alone or in combination with other plans and projects will not adversely affect the integrity of this European site.

Based on the information provided, I am satisfied that adverse effects can be excluded for Wicklow Mountains SAC. No habitat loss will occur. Adverse effects to the otter population from loss of habitat, noise disturbance, lighting and excavations can be effectively prevented by pre-construction check of all suitable otter habitat and by mitigation measures ensuring the protection of the Otter.

Based on the information provided, I am satisfied that adverse effects can be excluded for Wicklow Mountains SAC site in view of conservation objectives of the site.

The proposed development would not delay or prevent the attainment of the Conservation objectives of the Wicklow Mountains SAC.

Table 7: AA Summary matrix for North Bull Island SPA, Baldoyle Bay SPA, Malahide Estuary SPA, Dalkey Islands SPA, Howth Head Coast SPA, South Dublin Bay and River Tolka Estuary SPA, Rogerstown Estuary SPA, Skerries Islands SPA, Rockabill SPA, Ireland's Eye SPA, Lambay Island SPA, The Murrough SPA, Wicklow Mountains SPA [004040] and North West Irish Sea cSPA [004236].

--

North Bull Island SPA, Baldoye Bay SPA, Malahide Estuary SPA, Dalkey Islands SPA, Howth Head Coast SPA, South Dublin Bay and River Tolka Estuary SPA, Rogerstown Estuary SPA, Skerries Islands SPA, Rockabill SPA, Ireland's Eye SPA, Lambay Island SPA, The Murrough SPA, Wicklow Mountains SPA [004040] and North West Irish Sea cSPA [004236].

Maintain or restore favourable conservation condition

Detailed Conservation Objectives available: <https://www.npws.ie>

North Bull Island SPA [004006],

Light-bellied Brent Goose (*Branta bernicla hrota*), Shelduck (*Tadorna tadorna*), Teal (*Anas crecca*), Pintail (*Anas acuta*), Shoveler (*Anas clypeata*), Oystercatcher (*Haematopus ostralegus*), Golden Plover (*Pluvialis apricaria*), Grey Plover (*Pluvialis squatarola*), Knot (*Calidris canutus*), Sanderling (*Calidris alba*), Dunlin (*Calidris alpina*), Black-tailed Godwit (*Limosa limosa*), Bar-tailed Godwit (*Limosa lapponica*), Curlew (*Numenius arquata*), Redshank (*Tringa totanus*), Turnstone (*Arenaria interpres*), Black-headed Gull (*Chroicocephalus ridibundus*), Wetland and Waterbirds

Summary of Appropriate Assessment

Conservation Objectives Targets and attributes (summary)	Potential adverse effects	Mitigation measures
<p>To maintain the favourable conservation condition of species and wetland habitat. Long term population trend stable or increasing.</p> <p>No significant decrease in distribution range, timing or intensity of use of areas by all the above-named species other than occurring from natural patterns of variation.</p> <p>The permanent area occupied by the wetland habitat should be stable and not significantly less than the area of 1,713 hectares, other than that occurring from natural patterns of variation.</p>	<p>An accidental pollution event during construction could affect surface water downstream in Dublin Bay. An accidental pollution event of a sufficient magnitude, either alone or cumulatively with other pollution sources, could potentially affect the quality of the of intertidal/coastal habitats that support the special conservation interest bird species of the SPA. This could potentially affect the use of habitat areas by birds and have long-term effects on the SPA populations.</p> <p>The introduction and/or spread of invasive species to downstream European sites could potentially result in the degradation of existing habitats present, in particular coastal habitats not permanently or regularly inundated by seawater. This in turn could affect the use of habitat areas by birds and have long-term effects on the SPA populations.</p>	<p>Detailed pollution control measures to protect water quality are outlined within section 7.1.4 and include but are not limited to the use of silt fences, silt curtains, settlement lagoons and filter materials.</p> <p>Provision of exclusion zones and barriers (e.g. silt fences) between earthworks, stockpiles and temporary surfaces to prevent sediment washing into the existing drainage systems and hence the downstream receiving water environment.</p> <p>Provision of temporary construction surface drainage and sediment control measures to be in place before earthworks commence. Fuels to be stored in bunded areas, management of construction related traffic etc. Implementation of SUDs when complete to control run off during the operation of the scheme.</p> <p>See the mitigation measures described in Section 7.1.4 to prevent the introduction and/or spread of invasive species which includes the carrying out of preconstruction surveys and the implementation of an</p>

		Invasive Species management plan, Restore habitat after temporary loss.
--	--	--

Baldoyle Bay SPA [004016]

Light-bellied Brent Goose, Shelduck, Ringed Plover, Golden Plover, Grey Plover, Bar-tailed Godwit, and Wetland and Waterbirds.

Summary of Appropriate assessment

Conservation Objectives Targets and attributes (summary)	Potential adverse effects	Mitigation measures
To maintain the favourable conservation condition of species and wetland habitat. Long term population trend stable or increasing Distribution / Range, timing and intensity of use of areas / No significant decrease in the range, timing and intensity of use of areas by all of the above named species, other than that occurring from natural patterns of variation	As above	As Above

Dalkey Island SPA [004172]

Roseate Tern, Common Tern, Artic Tern

Summary of Appropriate assessment

Conservation Objectives Targets and attributes (summary)	Potential adverse effects	Mitigation measures
To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA	As Above	As Above

Howth Head Coast SPA [004113]

Kittiwake Rissa tridactyla

Summary of Appropriate assessment

Conservation Objectives Targets and attributes (summary)	Potential adverse effects	Mitigation measures

To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA	As Above	As above
--	----------	----------

South Dublin Bay and River Tolka Estuary SPA [004024]

Light-bellied Brent Goose (*Branta bernicla hrota*), Oystercatcher (*Haematopus ostralegus*), Ringed Plover (*Charadrius hiaticula*), Grey Plover* (*Pluvialis squatarola*), Knot (*Calidris canutus*), Sanderling (*Calidris alba*), Dunlin (*Calidris alpina*), Bar-tailed Godwit (*Limosa lapponica*), Redshank (*Tringa totanus*), Black-headed Gull (*Chroicocephalus ridibundus*), Roseate Tern (*Sterna dougallii*), Common Tern (*Sterna hirundo*), Arctic Tern (*Sterna paradisaea*), Wetland and Waterbirds.

*Grey Plover (*Pluvialis squatarola*) is proposed for removal from the list of SCI's for the site so no site specific conservation objective is included for the species

Summary of Appropriate assessment

Conservation Objectives Targets and attributes (summary)	Potential adverse effects	Mitigation measures
Long term pop trend stable or increasing Distribution - no significant decrease in range, timing or intensity of use of areas by wintering waterbirds No decline in roosting or breeding colonies. Human activities should occur at levels that do not adversely affect breeding or roosting sites.	As Above	As Above

Irelands Eye SPA [0045117]

Cormorant *Phalacrocorax carbo*, Herring Gull *Larus argentatus*, Kittiwake *Rissa tridactyla*, Guillemot *Uria aalge*, Razorbill *Alca torda*.

Summary of Appropriate assessment

Conservation Objectives Targets and attributes (summary)	Potential adverse effects	Mitigation measures
To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA. Long term pop trend stable or increasing No significant decrease in range, timing or intensity of use of areas	An accidental pollution event of sufficient magnitude could affect the quality of the intertidal/coastal habitats that support the special conservation interest bird species of the SPA. This could potentially affect the use of habitat areas by birds and have long-term effects on the SPA populations.	As Above

Malahide Estuary SPA [004025]

Great Crested Grebe Podiceps cristatus, Light-bellied Brent Goose Branta bernicla hrota, Shelduck Tadorna tadorna, Pintail Anas acuta, Goldeneye Bucephala clangula, Red-breasted Merganser Mergus serrator, Oystercatcher Haematopus ostralegus, Golden Plover Pluvialis apricaria, Grey Plover Pluvialis squatarola, Knot Calidris canutus, Dunlin Calidris alpina, Black-tailed Godwit Limosa limosa, Bar-tailed Godwit Limosa lapponica Redshank Tringa tetanus, Wetland and Waterbirds

Summary of Appropriate Assessment

Conservation Objectives Targets and attributes (summary)	Potential adverse effects	Mitigation measures
<p>To maintain the favourable conservation condition of species and wetland habitat.</p> <p>Long term population trend stable or increasing</p> <p>No significant decrease in range, timing or intensity of use of areas.</p> <p>Habitat area / Hectares /The permanent area occupied by the wetland habitat should be stable and not significantly less than the area of 765ha, other than that occurring from natural patterns of variation.</p>	As above	As Above

Rogerstown Estuary SPA [004015]

Greylag Goose Anser answer, Brent Goose Branta bernicla hrota, Shelduck Tadorna tadorna, Shoveler Anas clypeata, Oystercatcher Haematopus ostralegus, Ringed Plover Charadrius hiaticula, Grey Plover Pluvialis squatarola, Knot Calidris canutus, Dunlin Calidris alpina, Black-tailed Godwit Limosa limosa, Redshank Tringa tetanus, Wetlands and Waterbirds.

Summary of Appropriate Assessment

Conservation Objectives Targets and attributes (summary)	Potential adverse effects	Mitigation measures
<p>To maintain the favourable conservation condition of species and wetland habitat.</p> <p>Long term population trend stable or increasing</p> <p>No significant decrease in range, timing or intensity of use of areas.</p>	As Above	As Above

<p>The permanent area occupied by the wetland habitat should be stable and not significantly less than the area of 646 hectares, other than that occurring from natural patterns of variation.</p>		
--	--	--

Skerries Islands SPA [004122]

Cormorant *Phalacrocorax carbo*, Shag *Phalacrocorax aristotelis*, Brent Goose *Branta Bernicla hrota*, Purple Sandpiper *Calidris maritima*, Turnstone *Arenaria interpres*, Herring Gull *Larus argentatus*

Summary of Appropriate Assessment

Conservation Objectives Targets and attributes (summary)	Potential adverse effects	Mitigation measures
<p>To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA.</p>	<p>As Above</p>	<p>As Above</p>

Lambay Island SPA [004069]

Fulmar *Fulmarus glacialis*, Cormorant *Phalacrocorax carbo*, Shag *Phalacrocorax aristotelis*, Greylag Goose *Anser anser*, Lesser Black-backed Gull *Larus fuscus*, Herring Gull *Larus argentatus*, Kittiwake *Rissa tridactyla*, Guillemot *Uria aalge*, Razorbill *Alca torda*, Puffin *Fratercula arctica*

Summary of Appropriate Assessment

Conservation Objectives Targets and attributes (summary)	Potential adverse effects	Mitigation measures
<p>As Above</p>	<p>As Above</p>	<p>As Above</p>

Rockabill SPA [004014]

Purple Sandpiper *Calidris maritima*, Roseate Tern *Sterna dougallii*, Common Tern *Sterna hirundo*, Arctic Tern *Sterna paradisaea*

Conservation Objectives Targets and attributes (summary)	Potential adverse effects	Mitigation measures
<p>To maintain the favourable conservation condition of bird species listed as Special Conservation Interests for this SPA.</p>	<p>An accidental pollution event during construction or operation could affect surface water downstream in Dublin Bay. An</p>	<p>As Above in relation to water quality protection.</p>

<p>Long term population trend stable or increasing</p> <p>No significant decrease in range, timing or intensity of use of areas</p> <p>Human activities should occur at levels that do not adversely affect the breeding roseate tern population, the Common Tern population or the Artic Tern population – there should be no significant decline in these populations,</p>	<p>accidental pollution event of a sufficient magnitude, either along or cumulatively with other pollution sources, could potentially affect the quantity and quality of prey fish species and the quality and suitability of roosting sites within the SPA.</p> <p>Note Purple Sandpiper is located a significant distance from the proposed scheme and on the far side of the Howth peninsula and is not at risk of significantly effects.</p>	<p>The relevant mitigation measure described in Section 7.4.4.4 to avoid any potential disturbance related impacts on this SCI bird species during construction.</p>
--	--	--

The Murrrough SPA [004186]

Red-throated, Diver Gavia stellata, Greylag Goose Anser answer, Light Bellied Brent Goose Branta bernicla hrota, Wigeon Anas Penelope, Teal Anas crecca, Little Tern Sterna albifrons, Wetland and Waterbirds, Black-headed Gull Chroicocephalus ridibundus, Herring Gull Larus argentatus

Conservation Objectives Targets and attributes (summary)	Potential adverse effects	Mitigation measures
<p>To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA.</p> <p>To maintain or restore the favourable conservation condition of the wetland habitat at The Murrrough SPA as a resource for the regularly occurring migratory waterbirds that utilise it.</p>	<p>Similar concerns relating to water quality and the impact to habitats upon which the SCIs rely, as outlined in previous tables.</p>	<p>As outlined in previous tables in relation to protection of water quality.</p>

Wicklow Mountains SPA [004040]

Merlin (Falco columbarius) and Peregrine (Falco peregrinus)

Summary of Appropriate Assessment

Conservation Objectives Targets and attributes (summary)	Potential adverse effects	Mitigation measures
---	----------------------------------	----------------------------

<p>To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA.</p> <p>Note: There are no targets and attributes developed to date for these species on this site.</p>	<p>No potential for impacts to occur on any SCI bird species population of Wicklow Mountains SPA, in light of their conservation objectives, as a consequence of the disturbance and / or displacement due to increased levels of disturbance arising from the Proposed Scheme.</p>	<p>None.</p>
<p>North West Irish Sea cSPA (004236)</p> <p>Red-throated Diver (<i>Gavia stellata</i>), Great Northern Diver (<i>Gavia immer</i>), Fulmar (<i>Fulmarus glacialis</i>), Manx Shearwater (<i>Puffinus puffinus</i>), Cormorant (<i>Phalacrocorax carbo</i>), Shag (<i>Phalacrocorax aristotelis</i>), Common Scoter (<i>Melanitta nigra</i>), Little Gull (<i>Larus minutus</i>), Black-headed Gull (<i>Chroicocephalus ridibundus</i>), Common Gull (<i>Larus canus</i>), Lesser Black-backed Gull (<i>Larus fuscus</i>), Herring Gull (<i>Larus argentatus</i>), Great Black-backed Gull (<i>Larus marinus</i>), Kittiwake (<i>Rissa tridactyla</i>), Roseate Tern (<i>Sterna dougallii</i>), Common Tern (<i>Sterna hirundo</i>), Arctic Tern (<i>Sterna paradisaea</i>), Little Tern (<i>Sterna albifrons</i>), Guillemot (<i>Uria aalge</i>), Razorbill (<i>Alca torda</i>), Puffin (<i>Fratercula arctica</i>)</p>		
<p>Conservation Objectives Targets and attributes (summary)</p>	<p>Potential adverse effects</p>	<p>Mitigation measures</p>
<p>To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA</p>	<p>An accidental pollution event during construction could affect surface water downstream in Dublin Bay. An accidental pollution event of a sufficient magnitude, either alone or cumulatively with other pollution sources, could potentially affect the quality of the of intertidal/coastal habitats that support the special conservation interest bird species of the SPA. This could potentially affect the use of habitat areas by birds and have long-term effects on the SPA populations.</p> <p>The introduction and/or spread of invasive species to downstream European sites could potentially result in the degradation of existing habitats present, in particular coastal habitats not permanently or regularly</p>	<p>Detailed pollution control measures to protect water quality are outlined within section 7.1.4.1 and include but are not limited to: the use of silt fences, silt curtains, settlement lagoons and filter materials.</p> <p>Provision of exclusion zones and barriers (e.g. silt fences) between earthworks, stockpiles and temporary surfaces to prevent sediment washing into the existing drainage systems and hence the downstream receiving water environment.</p> <p>Provision of temporary construction surface drainage and sediment control measures to be in place before earthworks commence. Fuels to be stored in bunded areas, management of construction related traffic etc.</p>

	<p>inundated by seawater. This in turn could affect the use of habitat areas by birds and have long-term effects on the SPA populations.</p>	<p>Implementation of SUDs when complete to control run off during the operation of the scheme.</p> <p>See the mitigation measures described in Section 7.1.4 to prevent the introduction and/or spread of invasive species which includes the carrying out of preconstruction surveys and the implementation of an Invasive Species management plan.</p>
--	--	--

Overall conclusion: Integrity test

The applicant determined that following detailed assessment of potential impacts and the implementation of mitigation, the construction and operation of this proposed development alone or in combination with other plans and projects will not adversely affect the integrity of these European sites in view of the conservation objectives of those sites.

Based on the information provided, I am satisfied that adverse effects can be excluded for these SPA sites and that no effects of any significance will occur.

No habitat loss within the European designated sites will occur. Adverse effects from water contamination and sediment release can be effectively prevented by mitigation measures ensuring the protection of the Liffey Estuary Lower and existing surface water pipes which drain directly into Dublin Bay. No increase in existing runoff rates will occur and appropriate treatment will ensure runoff quality. The spread of invasive species can also be controlled via mitigation measures, pre confirmatory surveys will be carried out in order to avoid or adequately treat or remove invasive plants prior to construction being carried out in accordance with an Invasive Species Management Plan.

Therefore, based on the information submitted, surveys carried out and analysis provided I am satisfied that no uncertainty remains.

The proposed development would not delay or prevent the attainment of the Conservation objectives of any of these SPA sites in Dublin Bay and beyond.

Potential for Adverse effects

7.37. As outlined above the potential for adverse effects relates to the changes to water quality arising from pollution and sedimentation of watercourses arising at various locations and associated with various operations during the construction of the development and the deterioration of habitats and/or sedimentation arising from the spread of invasive plant species.

7.38. It is important to reiterate at this juncture that no works will take place within the boundary of any Natura 2000 site and as such the potential for direct effects does not arise.

- 7.39. The Zol for disturbance associated with general construction activities for wintering birds, disturbance effects would not be expected to extend beyond a distance of approximately 300m. There are no European sites within this Zol.
- 7.40. As highlighted above in Tables 2 – 7, in the absence of mitigation, there are European sites at risk of ex-situ habitat losses.
- 7.41. The Proposed Scheme crosses over two watercourses (the River Dodder and Grand Canal) for which otter are known to inhabit. It crosses over the River Dodder at two locations and the Grand Canal at one location on existing road bridges and interacts with the following watercourses via the surface water drainage network: Owenadoher River, River Dodder, Grand Canal, and Liffey Estuary Upper and Lower. The Liffey Estuary Lower is hydrologically connected to the Proposed Scheme via the Liffey Estuary Lower and the outfall at Grand Canal Dock and River Dodder. Dublin Bay is hydrologically connected to the Proposed Scheme via the Grand Canal, River Dodder and Liffey Estuary Lower.
- 7.42. Whilst these watercourses lie within the typical territorial ranges of otters, only the River Dodder and the Owenadoher River (as a tributary) shares a hydrological connection to the Wicklow Mountains SAC. The Templeogue section of the Proposed Scheme also lies within the same subcatchment as Wicklow Mountains SAC (Dodder_SC_010 subcatchment).
- 7.43. However, as the Wicklow Mountains SAC is located upstream of the project, there is no potential for a pollution event of any magnitude to affect any QI habitats or associated plant species for which this European site is designated. However, as highlighted above, as it is hydrologically connected to the River Dodder there is potential for direct / or indirect impacts to occur on QI otter populations (a mobile species) associated with the Wicklow Mountains SAC.
- 7.44. I highlight that no significant impacts, e.g., habitat severance or barrier effects, are predicted as a result of disturbance / displacement from the Proposed Scheme for the following reasons:
- The corridor is a pre-existing national road into Dublin City. Otter are known to commute and reside nearby these areas and as such are likely to be tolerant to traffic noise and other human related noise and disturbance.

- The nature of the works proposed in the vicinity of the Dodder crossing and Grand Canal. The main works required in these areas include new road markings and signage, traffic signal installation, carriageway and pavement resurfacing, kerb build outs and traffic island construction/removal, landscaping and utility diversions, all of which should not impede otter along the aquatic corridors running under the existing road bridges.
- The mitigation measures that will be put in place during construction to protect surface water quality.

7.45. In addition to the forgoing, I also consider it important to examine the potential for impacts to arise in relation to noise and vibration disturbance arising from construction works and in relation to air quality deterioration arising from both construction works and the operational phase of the development.

Noise & Vibration Disturbance

7.46. Potential adverse effects in relation to noise disturbance and vibration have been examined by the applicant within the NIS and are not considered to be likely to give rise to significant adverse effect due to the distance of Natura 2000 sites and known ex-situ sites from the proposed works. Effects would not be expected beyond 150m for mammals such as otter and 300m for wintering birds. It is stated that noise levels arising from construction would attenuate to existing background noise levels at that distance and there are no European sites within the disturbance ZOI of the Proposed Scheme.

7.47. The proposed scheme does not involve any significant instream works. No watercourses are being intersected or interfered with, there are no sites recorded, where water bodies may be subject to significance disturbance.

7.48. I note the culvert of a mill race within the Whitechurch Stream associated with Rathfarnham Castle Park which is proposed to be extended by 5 meters, during a dry period. The works proposed to the culvert which carries the mill race is as follows:

- At approximate chainage A160 it is proposed to extend an existing culvert under the Grange Road by circa 5m to facilitate road widening at the culvert location which is within the existing Rathfarnham Castle Park, as documented in the Proposed Surface Water Drainage Works (Sheet 1, Part 2 of 3 in Volume 3 of the EIAR).

- At the location of the culvert, it is proposed to widen the existing road by approximately 2m over the existing culvert. The existing culvert will be exposed during construction and surrounded with a suitable bedding material. A precast reinforced concrete protection slab will then be placed at a suitable level over the culvert to ensure that it is not damaged during construction and operation.
- The extended culvert will be a precast reinforced concrete box culvert that will match the existing form and dimension which is circa 2.3m wide and 0.65m high. The culvert extension will be laid to retain the existing level and gradient of the stream. In order to construct the culvert the existing boundary wall will be removed. To minimise disruption to the immediate area the existing stream will be temporarily overpumped for a short period of time during a dry period to allow the footprint of the culvert extension to be prepared for receipt of the culvert section by excavation of the footprint to formation level and placement of a concrete blinding. A small crane will be used to lift the culvert extension into place from the roadside under suitable temporary traffic management measures. After completion of the culvert extension the new boundary wall can be constructed.

7.49. Surveys for the proposed scheme did not confirm any otter holts within the footprint of the proposed scheme, however, an inactive holt (at that time) was identified during 2020 field surveys 145m north-west of Construction Compound TR3. Also, noted evidence of otter activity in a number of areas including sections of watercourse intersected by the proposed scheme. It is, therefore, considered that the proposed scheme is within the potential home range of male otter associated with the Wicklow Mountains SAC.

7.50. Given, however, that otter within the urban - suburban Dublin area are habituated to similar consistent background noise levels, no significant disturbance/ displacement effects on breeding/ resting otter in this location, are predicted. Construction works will typically be undertaken during normal daylight working hours and otter are generally nocturnal in habit, and otter can (in many circumstances) tolerate high levels of human presence and disturbance, displacement of otter from their habitat is extremely unlikely to affect the local otter population. Therefore, disturbance during construction is not likely to have a significant effect on the species' conservation objectives and will not result in a significant effect on otter as a result of disturbance / displacement impacts. Consequently, it is not likely that the proposed scheme pose

a risk of adversely affecting (either directly or indirectly) the integrity of Wicklow Mountains SAC.

Air Quality deterioration

- 7.51. In addition to the foregoing, consideration was given to the potential for adverse effects to occur in relation to habitat degradation as a result of air quality. I note that it is stated within the NIS that the unmitigated ZoI for air quality effects arising from the Proposed Scheme has the potential to extend 50m from the Proposed Scheme boundary, and 500m from construction compounds during the construction phase, and up to 200m of the Proposed Scheme boundary during the operational phase. There are no European sites present within these distances.

Habitat loss and fragmentation

- 7.52. As mentioned previously above the applicant identified three ex-situ locations which were utilised and traversed by Bird Species listed as SCIs of Malahide Estuary SPA, Baldoyle Bay SPA, North Bull Island SPA, South Dublin Bay and River Tolka SPA, Rogerstown Estuary SPA, Skerries Islands SPA, Ireland's Eye SPA, Lambay Island SPA, and potentially The Murrough SPA. Species include light bellied brent goose, golden plover oystercatcher, curlew, black-headed gull and black-tailed godwit and herring gull.
- 7.53. These sites were located at Eamon Ceannt Park, St Mary's College RFC and Templeogue College. While there is one documented wintering bird site at the western end of the proposed scheme, namely Tymon Park, a major site (Scott Cawley Ltd., 2017), that is mapped as occupying a corner of Tymon Park and adjacent open ground associated with the Spawell complex, no habitat loss will occur as there is no landtake required along the existing N81 Tallaght to Templeogue Road at this section. As the subject scheme will not result in the loss of sites suitable to support breeding gull and wintering bird species, there is no potential for impacts on SCI species associated with SPAs to occur as a result of habitat loss / fragmentation and there is no potential for in combination effects to occur.
- 7.54. Surveys were undertaken on a fortnightly basis in order to determine the importance of these sites for SCIs. I note that survey results demonstrated a relatively low frequency of occurrence of SCIs of the aforementioned Natura 2000 sites. Low occurrence suggests that these species do not regularly use or rely upon these lands

as foraging and/or roosting habitat and are likely to use other suitable sites available in the wider area on a similar or more regular basis.

- 7.55. Rathfarnham Castle Park is not identified as an ex-situ site for SCI wintering birds, but does nonetheless support wintering birds such as ducks, moorhens and some SCI gulls. While the Proposed Scheme will remove a narrow section along the boundary of the RCP, the majority is comprised of wooded vegetation which is not ordinarily utilised by wintering birds, as it prevents easy take off in case of disturbance/predation. Ideally wintering birds like large open spaces such as the central parts of RCP, which are not being directly impacted by the Proposed Scheme. Overall, given the relatively small area of wooded parkland impacted, it is not likely that the loss of woodland to facilitate the construction of the Proposed Scheme will result in significant loss of SCI foraging habitat.
- 7.56. There will be no loss of Annex I habitats and / or habitat supporting Annex II species, for which European sites are designated for within the Zol of the Proposed Scheme. The Proposed Scheme will not result in any direct loss or fragmentation of habitat by virtue of the location of the Proposed Scheme and its construction. In terms of otter, while the Proposed Scheme does cross the Dodder River and the Grand Canal, it does so at existing transport bridges and as such will not be subject to any instream works nor alteration to the territory currently occupied by otter. This includes Construction Compound TR1, which is located at the intersection of Wellington Land/ Spawell crossing of the R137 Templeogue Road, and TR3, which is separated from the River Dodder by existing green space and R112 Springfield Avenue, and TR6, which is separated from the River Dodder by existing bands of mature trees and disturbed ground in Dodder Valley Park.

Habitat degradation/effects on QI/SCI species as a result of hydrological impacts

- 7.57. The Proposed Scheme crosses two watercourses, the Dodder, and the Owenadoher. The Liffey Estuary Lower is hydrologically connected to the proposed scheme via the Liffey Estuary Lower and the outfall at Grand Canal Dock and River Dodder. Dublin Bay is hydrologically connected to the proposed scheme via the Grand Canal, River Dodder and Liffey Estuary Lower. Surface waters will also drain to Dublin Bay via existing drainage across the proposed scheme. Dublin Bay contains the following European sites: North Bull Island SPA, Baldoyle Bay SPA, Malahide Estuary SPA, Dalkey Islands SPA, Howth Head Coast SPA, South Dublin

Bay and River Tolka Estuary SPA, Rogerstown Estuary SPA, Skerries Islands SPA, Rockabill SPA, Ireland's Eye SPA, Lambay Island SPA, The Murrough SPA, Wicklow Mountains SPA and North West Irish Sea cSPA, marine mammals associated with Rockabill to Dalkey Island SAC and Lambay Island SAC and the otter population associated with the Wicklow Mountains SAC.

- 7.58. The release of contaminated surface water runoff and/or an accidental spillage or pollution event into any surface water features during construction, or operation, has the potential to affect water quality in the receiving aquatic environment. Such a pollution event may include: the release of sediment into receiving waters and the subsequent increase in mobilised suspended solids and the accidental spillage and/or leaks of contaminants into receiving waters. The associated effects of a reduction of surface water quality could potentially extend for a considerable distance downstream of the location of the accidental pollution event or the discharge.
- 7.59. Therefore, a reduction in water quality (either alone or in combination with other pressures on water quality) could result in the degradation of sensitive habitats present within Dublin Bay. As a worst-case scenario there is potential to affect mobile SCI bird species that commute, forage and loaf in Dublin Bay. It could also negatively affect the quantity and quality of prey available to SCI bird species. These potential impacts could occur to such a degree that they result in significant effects which could have implications for the conservation objectives of North Bull Island SPA, Baldoyle Bay SPA, Malahide Estuary SPA, Dalkey Islands SPA, Howth Head Coast SPA, South Dublin Bay and River Tolka Estuary SPA, Rogerstown Estuary SPA, Skerries Islands SPA, Rockabill SPA, Ireland's Eye SPA, Lambay Island SPA, The Murrough SPA, Wicklow Mountains SPA and North West Irish Sea cSPA, marine mammals associated with Rockabill to Dalkey Island SAC and Lambay Island SAC and the otter population associated with the Wicklow Mountains SAC.

Habitat degradation as a result of introducing/ spreading Non-Native invasive species

- 7.60. Although no non-native invasive species were recorded during field surveys, there are records of ten areas of Japanese knotweed, Himalayan balsam and three-cornered garlic, species listed on the Third Schedule of the (Birds and Natural Habitats) Regulations 2011 (as amended) present adjacent or in close proximity to

the proposed scheme. There is therefore potential for these species to spread or be introduced, during construction and/ or routine maintenance/ management works, to terrestrial habitat areas in European sites downstream in Dublin Bay, which includes: South Dublin Bay and River Tolka Estuary SPA, South Dublin Bay SAC, North Dublin Bay SAC, North Bull Island SPA and North West Irish Sea cSPA.

- 7.61. However, it is considered unlikely that invasive species could spread to European sites which are located a significant distance from the outfall locations of the Liffey Estuary Lower, such as Howth Head SAC, Howth Head Coast SPA, Rockabill to Dalkey Island SAC and Dalkey Islands SPA.

In combination Effects

- 7.62. In combination effects are examined within section 9 of the NIS submitted. The proposed works were considered in combination with all plans and/or projects with the potential to impact upon the European sites outlined above, I have also considered the North West Irish Sea cSPA in my consideration of in combination effects. Such plans and projects included any national, regional and local land use plans or any existing or proposed projects (that were in place at the time of lodgement of the proposed scheme for the consideration of the Board) that could potentially affect the ecological environment within the Zol of the Proposed Scheme and are listed in Table 35: 'Land Use Plans and Projects Considered for the In-Combination Assessment', Table 36: 'In Combination Assessment of Plans and Programmes' and Table 37 'In Combination Assessment of Major Projects' of the NIS submitted. Each plan and project has been individually considered for any potential in combination effects.
- 7.63. It is of note that the South Dublin County Development Plan 2022-2028 was made on 22nd June 2022 and came into effect on 3rd August 2022. The Dublin City Development Plan 2022-2028 was adopted at a Special Council meeting on the 2nd of November 2022. The plan came into effect on the 14th of December 2022. The consultation period for the proposed scheme was carried out under the previous plans, however, the application was lodged under the current 2022 – 2028 plans and has been assessed with regard to such plans. I have had regard to the current Development Plans for the purpose of assessing the potential for cumulative effects in relation to the proposed development and note that any new issues, as a result of the Development Plan change during the consultation period, have been considered.

- 7.64. It is important to note at this juncture that concerns have been raised within the submissions received in relation to the potential for in combination effects with regard to other significant infrastructure projects in and around the city such as adjoining CBC projects, Luas extension projects and Metrolink. All such projects have been considered in the context of in combination effects and it is important to note that such projects such must comply with all applicable planning and environmental approval requirements and be in accordance with the objectives and policies of the relevant land use plans (Development Plans, Local Area Plans etc.). Considering the environmental protection policies included within the relevant land use plans, the range of mitigation measures included in the Proposed Scheme to avoid significant impacts and that alone the Proposed Scheme will not adversely affect the integrity of any European sites, I am satisfied that the Metrolink and other such projects will not act in combination with the Proposed Scheme to have an adverse effect on the integrity of any European sites.
- 7.65. The in-combination assessment within Section 9.1 of the NIS (Table 37) submitted has concluded that there is no potential for adverse effects on the integrity of any European sites including those within its Zol, to arise as a consequence of the Proposed Scheme in-combination with any other plans or projects.
- 7.66. In the interest of clarity, it is important to note that all other bus connect routes have been considered in the assessment of cumulative effects. Given the nature of the proposed works and the standard nature of the proposed mitigation measures I am satisfied that the proposal will not give rise to cumulative impacts of any significance.
- 7.67. The ‘conclusion of in-combination assessment’ within Section 9.3 of the NIS submitted has concluded that there is no potential for adverse effects on the integrity of any European sites including those within its Zol, to arise as a consequence of the Proposed Scheme in-combination with any other plans or projects.
- 7.68. Mitigation measures detailed in Section 7 of the NIS and summarised within table 8 below will ensure that no adverse effects on European sites integrity will arise from the implementation of the Proposed Scheme.
- 7.69. The implementation of, and adherence to, the policies and objectives of the relevant plans set out in Section 9.2 of the NIS and those of the current Dublin City Development Plan 2022-2028 and South Dublin County Council Development Plan 2022 – 2028 will ensure the protection of European sites across all identified potential

impact pathways and will include the requirement for any future project to undergo Screening for Appropriate Assessment and/or Appropriate Assessment, as appropriate.

- 7.70. As the Proposed Scheme will not affect the integrity of European sites within the Zol of the Proposed Scheme, and given the protection afforded to European sites under the overarching land use plans, I am satisfied that there will be no adverse effects on the integrity of any European sites to arise as a consequence of the Proposed Scheme acting in-combination with any other plans or projects.
- 7.71. Overall, I am satisfied that the NIS and supplementary information provided as part of the application has examined the potential for all impact mechanisms in terms of the conservation objectives of the North Dublin Bay SAC, South Dublin Bay SAC, Rockabill to Dalkey Island SAC, Lambay Island SAC, Wicklow Mountains SAC, Howth Head Coast SPA, North Bull Island SPA, South Dublin Bay and River Tolka Estuary SPA, Baldoyle Bay SPA, Dalkey Islands SPA, Malahide Estuary SPA, Rogerstown Estuary SPA, Skerries Islands SPA, Rockabill SPA, Ireland’s Eye SPA, Lambay Island SPA, North West Irish Sea cSPA, and, The Murrough SPA. The potential for adverse effects can be effectively ameliorated by both design-based and applied mitigation measures related to surface water quality and spread of invasive species.

Mitigation Measures and Monitoring

- 7.72. A summary of mitigation measures is presented in the tables above. Full details are provided in the NIS, Construction Management Plan and Invasive Species Management Plan and summarised below. I consider that all measures proposed are implementable and will be effective in their stated aims. Furthermore, an Ecological Clerk of Works will be employed to ensure that measures are implemented as prescribed. A summary of mitigation measures is presented in Table 8 below.

Table 8: Summary of Mitigation Measures to avoid adverse effects on European Sites

<p>Measures to protect surface water quality and groundwater quality during construction:</p>	<p>Use of silt traps, silt fences, bunds for run off to collect in, good construction practice in relation to concrete use and wash out on site. The use of bunded areas, secured areas for hazardous materials, fuels, lubricants and use of</p>
---	---

	<p>spill kits. The use of onsite treatment for surface water runoff, use of settlement tanks/ponds and management of same. Monitoring of water bodies.</p> <p>Provision of temporary construction surface drainage and sediment control measures to be in place before earthworks commence.</p> <p>Fuels to be stored in bunded areas, and management of construction related traffic.</p>
Measures to protect surface water quality during operation:	Sustainable urban drainage systems (SUDS) including bioretention areas and filtration drains water butts and permeable paving.
Measures to eradicate/control the spread of non-native invasive species	Preconstruction survey, implementation of an invasive species management plan and post construction monitoring programme.
Measures to protect birds/ mammals from direct injury/ mortality	Preconstruction otter survey; night working within/ directly adjacent to watercourses where otter are known to commute will preferably not be undertaken; open excavations will be covered when not in use and backfilled as soon as practicable; and excavations will also be covered at night, where practicable, and any deep excavations which must be left open will have appropriate egress ramps in place.

Appropriate Assessment Conclusion: Integrity Test

7.82. In screening the need for Appropriate Assessment, it was determined that the proposal to develop a multimodal sustainable transport route had the potential to result in significant effects on North Dublin Bay SAC, South Dublin Bay SAC, Rockabill to Dalkey Island SAC, Lambay Island SAC, Wicklow Mountains SAC, Howth Head Coast SPA, North Bull Island SPA, South Dublin Bay and River Tolka Estuary SPA, Baldoyle Bay SPA, Dalkey Islands SPA, Malahide Estuary SPA, Rogerstown Estuary SPA, Skerries Islands SPA, Rockabill SPA, Ireland's Eye SPA, Lambay Island SPA, North West Irish Sea cSPA, and, The Murrrough SPA and that Appropriate Assessment was required in view of the conservation objectives of those sites.

7.83. Following a detailed examination and evaluation of the NIS all associated material submitted with the application as relevant to the Appropriate Assessment process and taking into account submissions of third parties, I am satisfied that based on the design of the proposed development, combined with the proposed mitigation measures, adverse effects on the integrity of North Dublin Bay SAC, South Dublin Bay SAC, Rockabill to Dalkey Island SAC, Lambay Island SAC, Wicklow Mountains SAC, Howth Head Coast SPA, North Bull Island SPA, South Dublin Bay and River Tolka Estuary SPA, Baldoyle Bay SPA, Dalkey Islands SPA, Malahide Estuary SPA, Rogerstown Estuary SPA, Skerries Islands SPA, Rockabill SPA, Ireland's Eye SPA, Lambay Island SPA, North West Irish Sea cSPA, and, The Murrrough SPA, can be excluded with confidence in view of the conservation objectives of those sites.

My conclusion is based on the following:

- A detailed assessment of all aspects of the proposed development that could result in significant effects or adverse effects on European Sites within a zone of influence of the development site.
- Consideration of the conservation objectives and conservation status of qualifying interest species and habitats
- A full assessment of risks to special conservation interest bird species and qualifying interest habitats and species
- Application of mitigation measures designed to avoid adverse effects on site integrity and likely effectiveness of same.

7.84. The proposed development would not undermine the favourable conservation condition of any qualifying interest feature or delay the attainment of favourable

conservation condition for any species or habitat qualifying interest for these European sites.

8.0 Environmental Impact Assessment

Introduction

- 8.1. The application is accompanied by an Environmental Impact Assessment Report (EIAR) which was prepared by an environmental team led by Jacobs on behalf of the applicant. This EIA section of the report should, where appropriate, be read in conjunction with the relevant parts of the Planning Assessment above.
- 8.2. The application falls within the scope of the amending 2014 EIA Directive (Directive 2014/52/EU) on the basis that the application was lodged after the last date for transposition in May 2017. The application also falls within the scope of the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018, as the application was lodged after these regulations come into effect on 1st September 2018.
- 8.3. The impact of the proposed development is addressed under all relevant headings with respect to the environmental factors listed in Article 3(1) of the 2014 EIA Directive. The EIAR sets out a case regarding the need for the development (Section 2.0). The EIAR provides detail with regard to the consideration of alternatives in Section 3. An overview of the main interactions is provided at Section 21.3. Details of the consultation entered into by the applicant with Dublin County Council, South Dublin County Council and other prescribed bodies as part of the preparation of the project are also set out in Section 1.7 of the EIAR and the Public Consultation Report 2018-2020 which is a separate document.
- 8.4. Article 3 (2) of the Directive requires the consideration of the effects deriving from the vulnerability of the project to risks of major accidents and / or disasters that are relevant to the project concerned. The potential for 'unplanned events' is addressed in Section 20.

- 8.5. The potential for 'flooding' is considered in Section 13 Water. I consider that the requirement to consider these factors under Article 3(2) is met.
- 8.6. In terms of the content and scope of the EIAR, the information contained in the EIAR generally complies with Article 94 of the Planning and Development Regulations 2001, as amended, all studies informing the EIAR are up to date and recently acquired. Additional pre-construction surveys will be required in order to provide up to date information in relation to invasive species, mammals, bats and birds, however, such issues can be adequately dealt with by condition.
- 8.7. It is important to note at the outset that the proposed development under consideration within this application does not cross international boundaries.

Alternatives

- 8.8. The consideration of Alternatives is documented within Section 3 of the EIAR submitted. I note that alternatives were considered at three levels, Strategic alternatives, route alternatives and design alternatives.
- 8.9. It is stated that the appropriate type of public transport provision in any particular case is predominately determined by the likely quantum of passenger demand along the particular public transport route. With this in mind the applicant considered the option of constructing a light rail service which would cater for a passenger demand of between 3,500 and 7,000 per hour per direction (inbound and outbound journeys). Based on the number of passengers predicted to use the new service, it was considered that there would be insufficient demand to justify a light rail option. The light rail option would also require significantly more land take, necessitating the demolition of properties.
- 8.10. Metro alternative was also considered and as there is a higher capacity requirement for such solutions it was not suitable for this route. In addition, the development of an underground metro would not remove the need for additional infrastructure to serve the residual bus needs of the area covered by the Proposed Scheme.
- 8.11. Heavy rail alternatives carry in excess of 10,000 people each direction each hour and was considered an unsuitable solution.
- 8.12. Demand management in the form of restricting car movement or car access through regulatory signage and access prohibitions, to parking restrictions and fiscal measures (such as tolls, road pricing, congestion charging, fuel/vehicle surcharges and similar)

were all considered as alternatives to the proposed scheme. However, it is stated that in the case of Dublin, the existing public transport system does not currently have sufficient capacity to cater for large volumes of additional users, such measures would not work in isolation to address car journeys into and out of the city and would not encourage people onto alternative modes.

- 8.13. Whilst technological alternatives are becoming increasingly advanced, the use of electric vehicles does not address congestion problems and the need for mass transit.

Route Alternatives

- 8.14. The applicant outlines within section 3.3 of the EIAR that alternative route options have been considered throughout the design development in response to consultations held with the public. The route selection process is outlined in Section 3.3.1 of the EIAR. I note that a 'spider's web' of route options were considered, and a sifting process ensued. See paragraph 4.10 of this report above for NTA response to route alternatives considered. Some 16 route options were considered for the Tallaght to Terenure corridor and 104 no. route options for the Rathfarnham to City Centre section.
- 8.15. Route options were then considered against environmental considerations such as soils and geology, flora and fauna, potential archaeological, architectural and cultural heritage impacts and impacts to roadside amenity such as existing trees. Other constraints relating to these routes such as land availability and the extent of third-party lands to be acquired were also considered and the route selections reduced and modified accordingly.
- 8.16. Having regard to the information submitted, it is clear, the applicant has considered a significant number of options for the proposed scheme and has been responsive to consultations held and concerns raised by the public. Each emerging route was considered in relation to several criteria such as economy, safety, integration, accessibility and social inclusion and environment.
- 8.17. Whilst I note that a number of submissions are concerned with the lack of alternatives considered by the applicant, this statement is not substantiated and in the context of the information provided by the applicant I am satisfied that the applicant has carried out an extensive, detailed and robust assessment of all reasonable options for the proposed scheme. I draw the Board's attention to Chapter 3 of the EIAR in which the

applicant comprehensively details all alternatives considered and the detailed assessment and consideration of the final Draft Preferred Route Options (PRO) for Section 1 – Section 4 of the route and the emergence of the preferred route.

- Section 1 Tallaght Road to Rathfarnham Road some 3 route options considered,
- Section 2 Nutgrove Avenue to Terenure Road North / Grange Road some 7 route options considered,
- Section 3 Rathfarnham Road / Terenure Road North to Charleville Road /Terenure Road East/ Rathgar Road some 5 route options considered and
- Section 4 Charleville Road to Dame Street, some 3 route options considered.

Population and Human Health

- 8.18. Chapters 10 and 11 of the EIAR consider the impacts to population and human health as a result of the proposed development. I note from the EIAR that impacts to population were considered under two sub assessments, i.e Community Assessment and Economic Assessment. The study area was informed by the CSO parish boundaries and are listed within section 10.2.1.1. of the EIAR. Economic study area is defined as individual businesses within the identified community areas that could be potentially impacted by the development as a result of displaced traffic.
- 8.19. Human health is considered in the context of the overall health status of the population within the study area, social inequalities, as this can be a determinant of health, and the overall exposure of the population in the study area to environmental impacts, such as the level of exposure to certain pollutants.
- 8.20. It is important to note at this juncture that impacts to communities arising from traffic, air quality, noise and vibration and visual and landscape are considered within the relevant sections of the EIAR submitted and with the planning assessment above and in the interest of conciseness will not be repeated hereunder. This Section of my report should therefore be read in conjunction with the relevant sections mentioned.
- 8.21. Issues raised in this context within the submissions received, relate to accessibility to properties both residential and commercial. Private residents are concerned about the functionality of their properties in terms of access, noise and loss of privacy. Concerns are also raised in relation to air quality and the impact to travel times as a result of

diversions due to two bus gates, rerouted traffic and during construction. Additional concerns relate to the loss of amenity space at Rathfarmham Castle Park and Woodview Cottages between Dodder View Road and Church Lane for the temporary use of lands for construction compound TR3.

Baseline conditions

8.22. In terms of relevant baseline data, the proposed scheme is located along an existing heavily trafficked route which is bounded by residential and commercial development. Of particular note in relation to baseline conditions along the route is current exceedances of both daytime and nighttime noise levels in excess of that recommended by the WHO. The applicant considers that the proposed scheme will improve the current situation in this regard, as it will enhance the potential for cycling and pedestrian facilities by provision of safe infrastructure, segregated from general traffic wherever practicable. The proposal seeks to reduce the number of private vehicles travelling along the route and therefore further reduce noise emissions for residents. Also, the proposed route will be operated by electric buses thus significantly reducing noise generation from these large vehicles.

Potential Impacts

8.23. Overall construction impacts relating to construction noise, dust, traffic disruption will be temporary and short term in terms of the magnitude of affect and are largely mitigated without any residual effects. Table 9 below provides a summary of the effects I have noted from these chapters in relation to population and health, it outlines the magnitude of these effects and mitigation measures where proposed. I will reiterate for the benefit of the Board that such impacts are examined in detail within the relevant sections hereunder. However, it is important to note at this juncture that no significant offsite health risks are expected as a result of the construction or operation of the development. Temporary disturbances given the nature of the works will not extend in the long-term post construction. I am satisfied that such impacts will not result in significant effects and can adequately be dealt with by way of mitigation.

8.24. Thus, having regard to the information provided within the EIAR and the submissions received, I consider the disruption to traffic as a result of both the construction of the development and the operation of the development to be the greatest impact to population and human health.

Mitigation Measures

- 8.25. I note in this regard that the applicant proposes to implement traffic management plans and protective measures to ensure that pedestrians and cyclists are provided with safe routes during the construction phase, and I further note that measures are proposed to facilitate deliveries to commercial premises both during construction and once the development is operational. Whilst such measures are not a perfect solution for all concerned, on balance I am satisfied that the applicant has adequately addressed the issue of traffic disruption by way of accommodation works during the operational phase of the development and mitigation during construction and regard being had that the inconvenience created by these diversions will cause annoyance to road users at certain times, it is for a limited period of time and the effect to population and human health is not a significant long term effect.
- 8.26. I acknowledge that permeant diversion of traffic to other routes will have a negative, moderate and long-term effect due to increases in traffic on some of the surrounding road network, it is anticipated that the improved access to a new multimodal route will reduce overall car dependence and therefore reduce the number of cars accessing the surrounding road network.
- 8.27. I note that cumulative effects in relation to surrounding permitted and planned development have also been considered within the EIAR and I agree with the conclusions of the EIAR that no significant impacts are expected to arise in this regard.

Conclusion

- 8.28. I have considered all of the written submissions made in relation to population and human health and the relevant contents of the file including the EIAR. I am satisfied that the potential for impacts on population and human health can be avoided, managed and/or mitigated by measures that form part of the proposed scheme, by the proposed mitigation measures and with suitable conditions. I am therefore satisfied that the potential for direct or indirect impacts on population and human health can be ruled out. I am also satisfied that cumulative effects, in the context of existing and permitted development in the surrounding area and other existing and proposed development in the vicinity of the site, are not likely to arise.

Table 9 Population and Human Health – Summary of potential & residual effects

Potential impacts	Magnitude of Impact	Mitigation	Residual Impact
Traffic disruption	Negative, Slight and Temporary to Short-Term.	Implementation of a traffic management plan. (See S. 6.5 & Ap. A5.1 CEMP)	None
Traffic collisions	Negative, Moderate and temporary to Short-Term.	As Above & Implementation of measures to protect cyclists and pedestrians.	None
Permanent traffic diversion – impact to individuals and businesses	Negative, moderate and long-term	As Above & Improved pedestrian & multi modal routes may encourage less car use.	Positive, Slight in the Long-term
Dust generation	Not significant and short term	Implementation of dust management measures.	None
Construction Noise – sleep disturbance	Negative, Moderate and Temporary	See Section 9.5 & Ap. A5.1 CEMP)	Negative, moderate to significant and temporary.
Operational Noise	Neutral, Imperceptible and Long-term	None	None
Other environmental hazards – water pollution, flooding, contamination. (Construction & operational phases)	Neutral	Measures to protect water quality and prevention of leaks and spills of hydrocarbons	None
Health impacts	Positive and Significant in the Long-Term.	People will have better access to health services	None
Health inequalities	Positive, Moderate and Long-term	People will have better access to health services	Positive, Moderate and Long-term
Air impacts	Positive, Slight and Long-term – reduction in vehicles and	None	Positive, Slight and Long-term

	electrification of bus fleet.		
--	-------------------------------	--	--

Air Quality and Climate

8.29. Chapter 7 and 8 of the EIAR submitted address the potential for impacts to arise in relation to Air Quality and Climate.

Baseline Conditions

Air Quality

8.30. The key pollutants considered relevant to the proposed development are identified as:

- Nitrogen Dioxide (NO₂)
- Particulate Matter PM₁₀ and PM_{2.5}
- Greenhouse gases; Carbon Dioxide (CO₂), Sulphur Hexafluoride (SF₆)

8.31. The EIAR submitted outlines, within table 7.2, the upper limits for the above pollutants and within 7.2.2, 7.2.2.2 and 7.2.2.3, the relevant international and domestic legislation and policy pertaining to same. Baseline ambient air quality is examined within section 7.3.2 of the EIAR and baseline line climate conditions are examined in section 8.4. Emissions are expected to arise in relation to both the construction and operation phases of the proposed development and will be examined in the context of the proposed mitigation measures hereunder.

8.32. The Proposed Scheme has been divided into four primary sections. The division line between sections has been determined by grouping similar carriageway types together. These sections have been further subdivided into 18 sub-sections, according to the types of construction works required.

8.33. The overall Construction Phase is forecast as 24 months, work will be transitory along the route and construction traffic movements are assumed to occur over a 12-month period along construction access routes accessing specific work zones as a worst-case. For National and Regional Roads serving multiple work zones, a Construction Phase of 24 months has been assumed.

8.34. The location of each section / sub-section along the Proposed Scheme is shown in Figure 5.1 in Volume 3 of this EIAR. The typical construction works to be carried out

at each section / sub-section are described in Section 5.3. The Sections / Sub sections are:

- Section 1: Tallaght Road, Templeogue Road to Rathfarnham Road:
 - Section 1a: M50 to Spawell Roundabout;
 - Section 1b: Spawell Roundabout;
 - Section 1c: Spawell Roundabout to Cypress Grove Junction;
 - Section 1d: Cypress Grove Junction to Templeville Road;
 - Section 1e: Templeville Road to Rathdown Avenue;
 - Section 1f: Rathdown Avenue to Terenure Road North; and
 - Section 1g: Rathdown Crescent, Rathdown Park, Bushy Park Road, Wasdale Park, Wasdale Road, Wasdale Grove, Victoria Road, Zion Road and Orwell Road.
- Section 2: Nutgrove Avenue to Terenure Road North – Grange Road, Rathfarnham Road:
 - Section 2a: Grange Road Junction to Main Street Junction;
 - Section 2b: Main Street Junction to Dodder Park Road;
 - Section 2c: Dodder Park Road to Terenure Junction;
 - Section 2d: Rathfarnham Junction to Mount Tallant Avenue; and
 - Section 2e: Mount Tallant Avenue to Harold's Cross.
- Section 3: Terenure Road North to Charleville Road – Terenure Road East, Rathgar Road:
 - Section 3a: Terenure Junction to Rathgar Avenue; and
 - Section 3b: Rathgar Avenue to Rathmines Road.
- Section 4: Charleville Road to Dame Street;
 - Section 4a: Rathgar Road to Grove Road;
 - Section 4b: Grove Road to Cuffe Street;
 - Section 4c: Cuffe Street to Dame Street; and

- Section 4d: Offline Sections.

8.35. In order to place the emissions due to the total Construction Phase in context, the CO₂ emissions are equivalent to the construction of approximately 87 three-bedroom houses using traditional construction methods (Monahan 2011)

Potential Construction Impacts

8.36. In terms of effects, it is considered that demolition, earthworks, construction and track out activities will give rise to dust. I note that the applicant has had regard to IAQM guidance in relation to the identification of the magnitude of effects which are defined in the said guidance document.

8.37. The magnitude of dust emissions is defined in relation to each specific activity, as follows:

- Demolition - Demolition will primarily involve the demolition of the existing boundary wall at Rathfarnham Castle (380m in length). The dust emission magnitude for the proposed demolition activities is classified as small as the total building volume is likely to be less than 20,000m³, with low potential for dust release.
- Earthworks – The dust emission magnitude for the proposed earthworks activities is classified as large, as the proposed Construction Compounds plus the construction site areas will have a total site area greater than 10,000m² and there may be between 5 and 10 heavy earth moving vehicles active at any one time. Notwithstanding that the impact is large, the magnitude of effects from this activity to human health and ecological receptors is temporary and medium, with mitigation.
- Construction works – The dust emission magnitude for the proposed construction activities is classified as small, due to the construction of a new boundary wall at Rathfarnham Castle. The key construction activities after earthworks are installation of the paving materials and the construction of one minor retaining wall. No buildings are proposed as part of the construction works. The magnitude of effects to ecological receptors and human health arising from construction works is low.

- Trackout movements – The dust emission magnitude for the proposed trackout can be classified as medium with between approximately 10 and 50 HDV (heavy duty vehicles) outward movements in any one day during peak construction activity and with surface material with a low potential for dust release. The magnitude of effects to human health is considered to be medium, temporary and low in relation to ecological receptors.

8.38. Construction traffic – 8 public roads are identified as required construction access routes where construction traffic will be permitted to travel along. An additional 528 HDV vehicles per day associated with construction traffic along each road including construction deliveries and earthworks material haulage are added to the base traffic volumes. I note the estimated construction traffic volumes are based on the peak construction period volumes and are therefore a worst-case assumption. The applicant considers that the scheme will be constructed in phases with lower volumes and the corridor of the proposed scheme will be used for a large bulk of construction delivery vehicles along its route.

8.39. The potential air quality impacts associated with additional construction traffic is examined in relation to NO₂, PM₁₀, and PM_{2.5}. Modelled receptors are outlined in the tables within Appendix A7.1 of the EIAR. Most impacted receptors are outlined in table 7.25 and 7.26 of the EIAR and refer to receptors with non-negligible impacts.

8.40. As shown in Table 7.27 and Figure 7.6 in Volume 3 of the EIAR, the majority of modelled receptors are estimated to experience a negligible impact due to the Proposed Scheme in terms of the annual mean NO₂ concentration. A slightly beneficial impact is estimated at 12 receptors along the Proposed Scheme, a moderate beneficial impact at nine receptors and a substantial beneficial impact is expected at one receptor. All beneficial impacts are modelled along the Proposed Scheme due to the diversion of traffic off these routes. A slight adverse impact is expected at five receptors. As shown in Table 7.27 and Figure 7.7 in Volume 3 of this EIAR the Proposed Scheme will be overall neutral in terms of annual mean PM₁₀ concentrations, with all receptors experiencing a negligible impact. As shown in Table 7.27 and Figure 7.8 in Volume 3 of the EIAR, the Proposed Scheme is overall neutral in terms of the annual mean PM_{2.5} concentration with all receptors experiencing a negligible impact.

8.41. Overall, it is stated within the EIAR that impacts relating to construction traffic pre mitigation are expected to be neutral and short term. I note that all pollutants modelled are within the upper level thresholds permitted.

Mitigation

8.42. Mitigation measures proposed during the construction phase of the development relate to the suppression of dust during the construction phase. Such measures include road sweeping, water misting or spraying during dusty activities, use of tarpaulins when transporting materials and use of site hoardings of 2.4 metres high. Significant residual impacts are not expected to arise.

Potential Operational impacts

8.43. As shown in Table 7.33 and Figure 7.3 in Volume 3 of this EIAR and Table 3.3 in Appendix A7.1 in Volume 4 of the EIAR, the majority of modelled receptors are estimated to experience a negligible impact due to the Proposed Scheme in terms of the annual mean NO₂ concentration. A slightly beneficial impact is estimated at 64 receptors, a moderate beneficial impact at 19 receptors and a substantial beneficial impact at 4 receptors due to the diversion of traffic off the Proposed Scheme routes. A slight adverse impact is expected at 7 receptors, and a moderate adverse impact at 1 receptor on the R137 Clanbrassil St Lower junction with the R811 South Circular Rd. This localised moderate adverse impact is considered negative, significant and short-term as NO₂ concentrations exceed the limit value but will decrease below the limit by 2043 due to reductions in emissions between 2028 and 2043 from advancements in engine technology and the addition of a higher percentage of electric vehicles to the fleet.

8.44. As shown in Table 7.33 and Figure 7.4 in Volume 3 of the EIAR, the Proposed Scheme will be overall neutral in terms of annual mean PM₁₀ concentrations, with all receptors experiencing a negligible impact. As shown in Table 7.33 and Figure 7.5 in Volume 3 of the EIAR, the Proposed Scheme will be neutral overall in terms of the annual mean PM_{2.5} concentration with all receptors experiencing a negligible impact.

8.45. The overall impacts associated with the Operational Phase of the development are stated as neutral and long-term. I bring to the attention of the Board that predictions reported are based on conservative assumptions regarding background pollutant concentrations and the improvement in vehicle emission rates. I note that 2019

background pollutant concentrations have been used to represent 2028 and are likely to be lower by the opening year than in 2019. The applicant states that older fleet projections were used in the absence of a fleet that incorporates the effects of 2021 Climate Action Plan measures – a larger proportion of electric vehicles is planned by the opening year than has been modelled. It is stated that total concentrations (and magnitude of change) are likely to be lower than those reported. I consider this to be a reasonable assumption of future emissions.

- 8.46. It is of note that impact to ecological receptors in the form of NO₂ deposits are stated as negative, slight and long term, I refer the Board to table 7.34 in which change in NO₂ deposition relative to identified receptors (such as the Grand Canal pNHA and Dodder Valley pNHA) are outlined. I am satisfied that the deposition levels will be below the permitted critical load and that in all cases no significant impacts will arise.

Mitigation for Operational phase

- 8.47. As the Proposed Scheme will have a generally neutral impact on air quality, no specific Operational Phase mitigation or monitoring measures are recommended. The area where moderate adverse impacts were modelled is on the R137 Clanbrassil St Lower junction with the R811 South Circular Rd, and both Existing Baseline and DM NO₂ concentrations are modelled near the limit value of 40 µg/m³. The impact from the Proposed Scheme derives both from these high baseline concentrations and increase in traffic flows at this location due to the Proposed Scheme. Whilst not a mitigation measure as such, it is noted that in time, vehicle emissions technology will improve and the Irish vehicle fleet will continue to evolve to the extent that vehicle emissions impacts associated with the Proposed Scheme are anticipated to be short-term. City wide traffic management measures and proactive encouragement of low emissions vehicle uptake would accelerate these improvements.
- 8.48. No mitigation is proposed in relation to the operational phase of the proposed scheme and no residual impacts are expected.
- 8.49. I have considered the potential for cumulative impacts to arise in relation to air quality and having regard to the information submitted and given the lack of any significant impacts associated with either the construction phase of the development or the operational phase of the proposal, I am satisfied that proposed development would not give rise to significant cumulative impacts in relation to air quality.

8.50. I further acknowledge that a significant number of submissions raised concerns regarding increases in air pollution as a result of the development. Particular concerns were raised in relation to the removal of trees / green areas and the movement of road space closer to properties. Whilst I acknowledge the concerns of third parties, the information provided in this regard is clear, robust and detailed and I am satisfied that based on the information provided notwithstanding the concerns raised within submissions significant impacts will not occur in relation to air pollution.

Climate

8.51. It is important to note at the outset when considering the proposed development in the context of climate, that Bus Connects is identified within the Climate Action Plan 2024 (CAP 24) as a key project that will contribute to the reduction in GHG within Ireland's cities. The CAP 24 supports the reallocation of road space to public transport and active travel and seeks to advance the bus connects programme in all 5 cities, over the coming years.

8.52. Impacts to climate are considered within section 8 of the EIAR and are considered in the context of GHG emissions relating to landuse change and construction, traffic related emissions and operational related emissions. Recent weather patterns and extreme weather events reported by Met Eireann, have been considered in the context of climate change locally.

Potential Construction Impacts

8.53. It is important to note at the outset that the key phases of the GHG (greenhouse gas) emissions generation are the embodied carbon of the construction materials and the construction activities, which, when combined, account for over 90% of all carbon emissions.

8.54. The applicant states that the Proposed Scheme is estimated to result in total Construction Phase GHG emissions of 4,353 tonnes embodied CO_{2eq} for materials over a 24-month period, equivalent to an annualised total of 0.006% of Ireland's non-ETS 2020 target and 0.036% of the 2030 Transport Emission Ceiling. The potential impact to climate due to embodied carbon emissions during the Construction Phase, prior to mitigation, will be negative, minor and short term.

8.55. In terms of identifying the magnitude of effect arising from the construction phase of the development, I note that in the absence of the agreed CAP24 Sectoral Emission

Ceilings any increase in GHG had to be considered significant. As such the applicant has stated impacts arising from the construction phase of the development are negative, minor and short term.

- 8.56. Thus, whilst I acknowledge the justification in relation to the stated magnitude of effects to climate arising from the construction phase of the development, I am satisfied that having examined the carbon emission equivalent of the proposal in the context of the Sectoral Emission Ceilings set out in CAP24, that the proposed development would not give rise to any significant climate impacts and has been adequately assessed within the EIAR in this regard.

Potential Operational Impacts

- 8.57. With regard to the operational phase of the development is it important to note that climate is heavily influenced by GHG emissions and transport emissions are a significant factor in the level of GHGs released into the atmosphere. I draw the Boards attention to section 8.4.3 of the EIAR in which it is stated that private cars accounted for 73.7% of all road trips in 2019 whilst public transport accounted for 6.5% which I note is an increase of 3% from the previous year. It is stated within the EIAR submitted that transport is the second highest emitter of GHG nationally and currently accounts for 20.3% of the national GHG output, with cars accounting for 57.4% of total road transport GHG emissions. I draw the Boards attention to CAP 24 in which updated figures are provided in this regard, latest figures state that transport is responsible for 17.1% of the national GHG output. Transport emissions over both 2021 and 2022 have seen increases in emissions of approx. 6% per annum with the ending of pandemic restrictions and the return to pre-Covid levels of economic activity.
- 8.58. Whilst transport emissions associated with the construction phase will increase slightly, it is important to consider the overall impact of the development during both the construction and operational phase. The proposed development is expected to be in use for 60 years and will support the delivery of an efficient, low carbon and climate resilient public transport service, which supports the achievement of Ireland's emission reduction targets. It is stated that the proposal has the potential to reduce GHG emissions equivalent to the removal of approximately 15,590 and 11,470 car trips per weekday from the road network in 2028 and 2043, respectively. This has the effect of a reduction in total vehicle kilometres, a reduction in fuel usage, and increases to sustainable transport trips and modal share in accordance with the 2024

Climate Action Plan. This represents a significant contribution towards the national target of reducing car emissions and car use by 2030 as set out in table 15.5 of CAP24.

- 8.59. In relation to impacts to sequestered carbon I note a number of trees will be removed as part of the earth works and preparation stage of construction and third parties have expressed their concerns in this regard. Whilst I acknowledge the concerns raised I note it is proposed to plant some 400 new trees which taken in the context of the proposed construction works will have a neutral effect on the sequestering of carbon over the life of the development. I also note that some grassland will temporarily be removed to facilitate Construction Compounds. This will be temporary in nature and negligible and not be a significant impact. In summary of the foregoing, the applicant has stated that the magnitude of effects arising from the operation of the development will be Negligible and Permanent. I note no mitigation is required in relation to the operation or maintenance of the proposed development and no residual impacts arise.
- 8.60. Having regard to the information submitted and the requirements outlined within CAP 24, I am satisfied that all impacts in relation to climate have been robustly assessed and the applicant has considered all aspects of the development in a detailed manner within both sections 7 and 8 of the EIAR and has provided extensive information in support of the analysis submitted within the relevant appendices to this document. I am also satisfied that the proposal is supported by the recently adopted CAP 24 which was not finalised prior to the submission of this application but is nonetheless essential to the assessment of the development in the foregoing context.
- 8.61. It is important to state at this juncture that in considering the impact on climate I have had regard to the Climate Action and Low Carbon Development (Amendment) Act 2021 which requires Ireland to achieve a 51% reduction in emissions by 2030 (relative to 2018 levels) and a 20% reduction by 2025.

Conclusion

- 8.62. In conclusion, I have considered all of the written submissions made in relation to air quality and climate and the relevant contents of the file including the EIAR. I am satisfied that the potential for direct or indirect impacts on air quality and climate can be avoided, managed and/or mitigated by measures that form part of the proposed scheme, by the proposed mitigation measures and with suitable conditions. I am therefore satisfied that the potential for direct or indirect impacts on air quality and

climate can be ruled out I am also satisfied that cumulative effects, in the context of existing and permitted development in the surrounding area and other existing and proposed development in the vicinity of the site, are not likely to arise, given that overall risks subject to mitigation being implemented are predicted as being negligible.

Table 10 Air Quality & Climate – Summary of potential & residual effects

Potential impacts	Magnitude of Impact	Mitigation	Residual Impact
Dust Generation during construction.	Negative, not significant and short term.	Cleaning of roads, watering of stockpiles, covering trucks, site hoarding 2.4 in height.	Not significant
Overall construction phase traffic impacts to air quality in vicinity of scheme. (Impacts to human health)	Neutral and short term	None	Not significant
Construction traffic impacts to air quality within areas taking diverted traffic.	Neutral and short term	None	Not significant
Embodied Carbon	Negative, Minor and Short-Term	Reduce use of materials such as concrete and fuels and reuse materials where practicable	Negative, Minor and Short-Term
Impacts arising from operation and maintenance	Positive and long term	None	None

Noise and Vibration

8.64. Chapter 9 of the EIAR examines the potential for impacts to arise in relation to noise and vibration. I highlight that a number of third party submission have raised concerns in relation to noise and the potential for operational noise to impact residential amenity. I will therefore examine the potential for such impacts to arise hereunder within this section of the EIAR.

Baseline Conditions

8.65. In order to establish baseline conditions, the applicant utilised Traffic Noise level monitoring data which is recorded and mapped by the EPA. The applicant also carried out independent noise surveys in the form of attended and unattended surveys at various locations along the route. Attended surveys were undertaken at a total of 18 locations along the length of the Proposed Scheme during July and September 2020. Unattended surveys (one week in duration) were made at two locations during August and September 2020 to supplement the attended survey locations and the desktop baseline noise study. I refer the Board to Section 1.3 of appendix A9.1 of the EIAR which outlines specific survey dates and times for each location and results. Tables 9.19 – 9.23 of the EIAR outline the overall survey results in relation to each location.

8.66. Baseline data results identify road traffic as the dominant noise experienced along the route during both daytime and night-time hours. I note traffic noise levels recorded along Tallaght Road to Rathfarnham Road are between 55 dB and 75 dB L_{den} for the area. The closest NSLs are located in the Rossmore Estate, within 25m of the road centre lines. At these NSLs, L_{den} contours are between 65 dB and 69 dB L_{den} . In this section of the study area, the majority of residential NSLs are in the 55 dB to 59 dB L_{den} contour.

At Nutgrove Avenue to Terenure Road North. The closest NSLs are predominately residential NSLs lining the R114 Rathfarnham Road, and are mapped within the 60 dB and 64 dB L_{den} and 55 dB to 59 dB L_{night} noise contours, with a small number of NSLs in the higher 65 dB to 69 dB L_{den} noise contour when located close to junctions.

Terenure Road North to Charleville Road, the closest residential NSLs are located east of Rathgar Avenue junction and are mapped within the 70 dB to 74 dB L_{den} noise contour. Night-time noise levels at these NSLs are mapped within the 55 dB to 59 dB L_{night} contour. The remaining NSLs adjacent to this section of the Proposed Scheme are within the 60 dB to 69 dB L_{den} and less than 50 dB to 54 dB L_{night} noise contours, depending on the distance from the road edge and road boundary treatments.

Charleville Road to Dame Street. The mapped noise contours at the closest NSLs within 10m to 20m to the centre line are within the 65 dB to 69 dB L_{den} noise contour with a small number of NSLs mapped within the higher noise contour band between 70 dB and 74 dB L_{den} . Night-time noise levels at the closest residential NSLs are between 55 dB and 59 dB L_{night} for the majority, with a small number of properties mapped within the 60 dB to 64 dB L_{night} contour. A number of educational NSLs are located within this section of the study area. Those buildings which lie within the noise mapped zones include Rathmines College of Further Education (≤ 55 dB to 59 dB L_{den}), TUD Conservatory of Music and Drama (55 dB to 64 dB L_{den}), TUD – City Campus (≤ 55 dB to 64 dB L_{den}), Dublin Business School (60 dB to 69 dB L_{den}) and St. Mary’s College Rathmines (< 55 dB L_{den}).

Other NSLs in this assessment zone include Medical Centres adjacent to the road edge in Rathmines (60 dB to 69 dB L_{den}), Rathmines Library (55 dB to 74 dB L_{den}) and Church of Mary Immaculate Refuge of Sinners (60 dB to 64 dB L_{den}).

I note that the highest average daytime noise level noise levels were measured at the following locations:

- Close to the R137 Templeogue Road and R112 Templeville Road junction. L_{den} values calculated in this area ranged between 63 and 71 dB L_{den} .
- R114 Wexford Street and R110 Kevin Street Lower junction. L_{den} values calculated in this area ranged between 69 and 70 dB L_{den} .
- The R114 Rathfarnham Road, Castleside Drive and Main Street junction. L_{den} values calculated in this area ranged between 69 and 72 dB L_{den} .
- Close to the R137 Harold’s Cross Road and Rathgar Avenue junction L_{den} values calculated in this area ranged between 63 and 71 dB L_{den} .

8.67. Overall noise levels are high and generally exceed the upper limits for ambient noise levels for daytime and nighttime hours.

8.68. I note that noise surveys were carried during COVID restrictions. The applicant has addressed the potential impact to baseline data gathered at this time and has reviewed long term noise monitoring locations based on long term noise monitoring data provided by DCC. Review of the DCC noise monitoring data has indicated that the overall difference in average noise levels between June and October of 2019 and

2020 are between 1dB to 2dB lower. It is stated that noise levels are likely to be 0.4dB to 1.5dB lower during the 2020 survey periods when compared to the same months during 2019 due to COVID-19 travel restrictions. This difference in levels is negligible in the overall context of describing the prevailing baseline noise environment.

- 8.69. Vibration surveys were also conducted at various locations and results indicate that vibration levels associated with a heavily trafficked urban – suburban road with a mix of fleet inclusive of dedicated bus lane result in negligible vibration levels at the edge of the road both in terms of human perception and building response.

Potential impacts of noise and vibration

- 8.70. Noise generation will arise in relation to construction works and the operation of plant during this time and will also relate to the increase in buses utilising the route during operation. There is also a potential for noise disturbance to arise in areas which cater for diverted traffic both during construction and permanently during the operation of the development.
- 8.71. The applicant has examined all sources of noise associated with the construction and operation of the development. The EIAR examines each construction activity at specific locations and considers the impact in terms of a range of distances at noise sensitive locations, I draw the boards attention to tables 9.26 – 9.35 in which each construction activity is outlined in terms of noise emissions relative to the distance from NSLs. In the absence of mitigation, it is clear from the tables submitted that noise exceedances will occur in relation to all activities at the closest distances to NSLs and at some other distances to varying degrees of intensity. The magnitude of impacts therefore ranges from slight to very significant, on a temporary basis and over the short term during both daytime and nighttime hours.
- 8.72. The predicted noise levels are between 54 to 78 dB $L_{Aeq,T}$ at closest NSLs to Construction Compounds associated with day to day material handing activities. I note that Woodview Cottages at 10m distance would have a 78 dB $L_{Aeq,T}$. With reference to the CNLs (Construction Noise Level) in Table 9.33, it is stated that the potential noise impacts at the closest NSLs from Construction Compounds range between negative, not significant to significant, and temporary during the daytime period and negative,

not significant to very significant, and temporary during the evening and weekend periods in the absence of noise mitigation.

- 8.73. Construction traffic has been modelled and it is expected that 260 HGV movements (130 vehicles) will occur over a peak construction day. Modelling has been carried out at numerous locations outlined in Table 9.37 of the EIAR. Modelling results during the assessed construction year 2024, indicate that Castlewood Park and Charleville Road will experience the highest potential noise impacts.
- 8.74. Such impacts arise as a result of traffic management measures and related redistributed traffic temporarily onto these roads. The change in traffic noise is defined as major with traffic noise level calculated at the closest NSLs along these roads categorised as moderate. The overall impact is determined to be negative, moderate and temporary. I draw the boards attention to Table 11 below in which impacts in relation to all other roads considered within 1km radius of the development are outlined and range between negative medium/moderate to positive, imperceptible, and temporary.
- 8.75. Potential impacts arising from vibration are associated with the widening and upgrading of existing footpaths and kerbs. Such activities require earthmoving, excavation and compaction which are identified within the TII guidance for the treatment of Noise and Vibration in national road schemes as having potential to generate significant amounts of vibration.
- 8.76. I note from the information submitted that the magnitude of effects associated with this activity is stated as negative, slight to moderate, temporary effects at distances of 10m from the activity. Beyond 50m from this type of activity, impacts are stated to be reduced to not significant to slight and temporary. For all other works, vibration impacts will be below those associated with perceptible vibration and will be imperceptible to not significant and temporary.
- 8.77. I further note that the applicant states that all construction works are orders of magnitude below limits values associated with any form or cosmetic or structural damage for structurally sound or protected or historical buildings or structures. Based on the information submitted I am satisfied that a robust and detailed assessment of vibration has been carried out by the applicant and that no significant effects arise from the proposed works.

Mitigation Measures

- 8.78. Mitigation measures are set out within the Construction Management Plan and are discussed in Section 9.5 of the EIAR. As outlined above and within the summary table below it is clear that the largest magnitude of effects arises at distances of 10 - 30 metres from the proposed works and relate to construction related activities whereby concrete is to be removed and replaced, boundary walls are being replaced and road widening is to be carried out. Other significant impacts arise during evening and weekend hours whereby the upper limit for ambient noise is lower.
- 8.79. Thus, whilst mitigation is proposed in relation to all construction related works, of particular note are the measures relating to general road works, road widening and diversion, works relating to quiet streets, site compounds and boundary treatment. I note in this regard that machinery will be fitted with acoustic exhausts and within enclosure panels which will reduce noise by 10dB. Mufflers will be fitted to pneumatic concrete breakers and tools, noisy items will be placed away from NSLs and sensitive boundaries. Compressors will be soundproofed by acoustic lagging or enclosed within the acoustic enclosure. Screens will be used to dampen noise near NSLs when breakers or drill bits are used. Site hoarding of 2.4m in height will be provided along noise sensitive boundaries and at the Construction Compounds. Such measures can also reduce noise levels by up to 10dB.
- 8.80. Works will be carried out largely within daytime hours, however, it will be necessary to carry out some works infrequently during nighttime hours. The applicant states that cumulative noise impacts will be carefully considered and avoided in order to protect NSLs. It is intended that construction activities will be scheduled in a manner that reflects the location of the site and the nature of neighbouring properties.
- 8.81. The type of works and the duration will be communicated to residents at all times so that residents are aware of the type of work to be carried out and can plan accordingly. Noise monitoring will ensure that any exceedances are addressed without delay. Similarly works which may give rise to vibration will only be carried out during daytime hours and monitoring will ensure exceedance of upper limits do not arise.
- 8.82. Overall mitigation measures are expected to reduce noise levels by 10dB. The prevailing daytime baseline noise levels is assumed as 65dB and evening baseline levels are 63dB. Following mitigation, the highest predicted construction noise levels are between 67 to 75 dB LAeq,T at the closest properties impacted by the most

intrusive works. The higher impacts will be at those properties where the prevailing baseline is below the specific predicted construction works noise levels. No significant effects are expected during daytime hours post mitigation. Significant residual effects only remain in relation to nighttime and weekend hours whereby upper limit thresholds are lower at these times.

- 8.83. Overall, it is expected that in most instances noise generated by works will assimilate into the existing background noise levels and will not give rise to significant impacts. In addition, as the proposed development is a linear route, works will move continuously therefore being temporary in nature at any location along the route.

Residual Impacts

- 8.84. Significant residual impacts remain during night-time and evening hours in relation to the majority of scheduled works within 20m of the works and in relation to road widening/ utility diversion works and boundary walls reconstruction within 10m of the works.
- 8.85. In this regard I note that the applicant has had regard to the DMRB Noise and Vibration (UKHA 2020) in cases of moderate to major magnitude of impacts, the duration of works determines the overall significance rating. As part of the mitigation measures, the durations advised in the DMRB Noise and Vibration (UKHA 2020) will be followed, where feasible, to reduce overall significance effects (i.e. scheduling works to occur for periods of less than ten days/nights over 15 consecutive day/night periods and less than 40 days over six consecutive months where significant effects are identified). Once the CNL and duration of works is considered in line with the DMRB Noise and Vibration (UKHA 2020) all key Construction Phase residual noise levels are not considered to be significant.
- 8.86. As outlined above significant impacts do not arise in relation to vibrations and as such significant residual impacts will not occur. In addition, the magnitude of effects arising from the operation of the development is positive to negative and slight, mitigation measures are therefore not proposed in relation to the operational phase of the development.

Conclusion

- 8.87. I have considered all of the written submissions made in relation to noise and vibration and the relevant contents of the file including the EIAR. I am satisfied that the potential

for direct or indirect impacts on noise and vibration can be avoided, managed and/or mitigated by measures that form part of the proposed scheme, by the proposed mitigation measures and with suitable conditions. I am therefore satisfied that the potential for direct or indirect impacts in relation to Noise and Vibration can be ruled out I am also satisfied that cumulative effects, in the context of existing and permitted in the surrounding area and other existing and proposed development in the vicinity of the site, are not likely to arise.

Table 11 Noise & Vibration – Summary of potential & residual effects

Potential impacts	Magnitude of Impact	Mitigation	Residual Impact
General Road Works, Quiet Street Treatment and Urban Realm Landscaping	<u>Daytime</u> - Negative, Moderate to Significant, and Temporary <u>Evening time and Weekends</u> - Negative, Significant to Very Significant and Temporary	Yes, Localised screening around high noise level plant items.	<u>Daytime</u> Negative, Slight to Moderate and Temporary at NSLs within 15m from the proposed works; and Negative, Not Significant and Temporary at NSLs at distances greater than 15m from the proposed works. <u>Evening time and Weekend</u> Negative, Moderate to Significant and Temporary at NSLs within 15m from the proposed works; and Negative, Not Significant and Temporary at NSLs at distances greater than 15m from the proposed works
Road Widening, Road reconstruction, Utility Diversion Works, retaining walls	<u>Daytime ranges</u> relate to distance from works and range between negative, not significant to very significant, and temporary. <u>Evening & wkd</u>	Yes, Refer to Section 9.5.1.1 for the range of noise mitigation measures which will be adopted at specific working areas to reduce noise impacts at NSLs.	<u>Daytime</u> - Negative, Slight to Moderate and Temporary at NSLs within 20m from the proposed works; and Negative, Not Significant and Temporary at NSLs at distances greater than 20m from the proposed works. <u>Nighttime</u> - Negative, Significant to Very Significant and

	Negative, not significant to very significant, and temporary during the evening and weekend periods	Particular emphasis is given to localised screening around high noise level plant items including, breakers and excavators and enclosures for power packs (vacuum excavators) and quiet plant.	Temporary at NSLs within 10m from the proposed works; and Negative, Moderate to Significant and Temporary at NSLs within 10m to 20m from the proposed works; and Negative, Not Significant and Temporary at NSLs at distances greater than 20m from the proposed works.
Boundary Wall, and structures	<u>Daytime period</u> - at nearest distance - Negative, Moderate to Significant and temporary <u>Evening & weekends</u> – at nearest distance- Negative, significant to very significant, and temporary.	Yes, as above	<u>Daytime</u> - Negative, Slight to Moderate and Temporary at NSLs within 15m from the proposed works; and Negative, Not Significant and Temporary at NSLs at distances greater than 15m from the proposed works. <u>Evening & weekends</u> . Negative, Moderate to Significant and Temporary at NSLs within 15m from the proposed works; Negative, Slight to Moderate and Temporary at NSLs within 15m to 20m from the proposed works; and Negative, Not Significant and Temporary at NSLs at distances greater than 20m from the proposed works.
Construction Compounds	<u>Daytime Period</u> : Negative, Moderate to Significant and Temporary at NSLs within 10m of the Construction Compounds; Negative, Slight to Moderate and	Yes, as above	<u>Daytime range</u> – Negative, Not Significant and Temporary at NSLs at distances within 10m of the Construction Compounds.

	<p>Temporary at NSLs between 15m and 40m from the Construction Compounds; and Negative, Not Significant and Temporary at NSLs at distances beyond 40m from the Construction Compounds.</p> <p><u>Nighttime and Weekends:</u></p> <p>Negative, Significant to Very Significant and Temporary at NSLs within 20m of the Construction Compounds; Negative, Moderate to Significant and Temporary at NSLs between 20m to 40m from the Construction Compounds; and Not Significant and Temporary at distances greater than 50m from the Construction Compounds.</p>		
Construction vibration from general road works and construction	Negative, Imperceptible to Not Significant and Temporary	Yes, As above	<u>Evening & weekends</u> Negative, Moderate to Significant and Temporary at NSLs at distances within 10m of the Construction Compounds; and Negative, Not Significant and Temporary at NSLs at distances greater than 15m from the Construction Compounds.

activities & ground breaking beyond 50m			
Construction vibration from ground breaking activities within 10m of occupied residential buildings	Negative, Slight to Moderate and Temporary.	Yes, Localised screening around high noise level plant items.	Negative, Slight and Temporary
Construction Traffic – within 1Km of study area	Neutral, Imperceptible, and Temporary impact to Negative, Slight to Moderate and Temporary		Neutral, Imperceptible, and Temporary impact to Negative, Slight to Moderate and Temporary
Summary of Overall Significance rating for Potential Construction Phase Traffic Impacts – Year 2024			
Castlewood Park	Moderate	No	
Charleville Road	Moderate		
Wynnefield Road	Moderate		
Kennilworth Park	Not Significant - Slight		

Mountpleasant Avenue Lower	Moderate		
Operational Phase			
Opening Year (2028) traffic noise – Proposed Scheme	Direct, Positive, Imperceptible to Slight, Short to Medium term impact to Direct, Negative, Slight to Moderate, Short to Medium impact.	No	Direct, Positive, Imperceptible to Slight, Short to Medium term impact to Direct, Negative, Slight to Moderate, Short to Medium impact.
Opening Year (2028) traffic noise – Surrounding road network	Indirect, Positive, Imperceptible to Slight and Short to Medium-Term to Indirect, Negative, Moderate and Short to Medium-Term	No	Indirect, Positive, Imperceptible to Slight and Short to Medium-Term to Indirect, Negative, Moderate and Short to Medium-Term
Design Year (2043) traffic noise – Proposed Scheme	Direct, Positive, Imperceptible to Slight and Long Term to Direct, Negative, Not Significant and Long Term	No	Direct, Positive, Imperceptible to Slight and Long Term to Direct, Negative, Not Significant and Long Term.
Design Year (2043) traffic noise – Surrounding Road Network	Indirect, Positive, Imperceptible to Slight and Long-Term to Indirect, Negative, Slight to Moderate and Long-Term	No	Indirect, Positive, Imperceptible to Slight and Long-Term to Indirect, Negative, Slight to Moderate and Long-Term.

Operational Phase Vibration	Neutral, Imperceptible, long-term	No	Neutral, Imperceptible, Long-Term
Bus stops – existing location	Neutral, Imperceptible, long-term	No	Neutral, Imperceptible, Long-Term
Bus stops – new locations	Negative, Not Significant, Long-Term	No	Negative, Not Significant, Long-Term.

Biodiversity

8.179. Chapter 12 of the EIAR submitted examines the potential for impacts to arise in relation to biodiversity. This element of the development will focus on biodiversity in general within the site and its surrounds.

Baseline Conditions

8.180. The lands within and adjacent to the development site are urban in nature. The route runs via the R137 along Tallaght Road and Templeogue Road, through Templeogue Village, to Terenure Cross, where it joins with the Rathfarnham to City Centre section. Habitats present within the Templeogue to Terenure Section largely include artificial surfaces associated with the road and adjacent urban areas – commercial and residential habitats, although wider verges such as at the edge of Tymon Park, and wooded verges are also noted. The Proposed Scheme continues along the R137 Templeogue Road intersecting with urban habitats but also passing by the open playing fields of Terenure College and Bushy Park including mature treelines

before joining residential development on both side of the road towards Terenure. The habitats along the route are characterised by built environment with occasional patches of amenity grassland, treelines, and scattered trees and parkland streetscape (associated with Rathfarnham Castle). Approaching Springfield Avenue, the Proposed Scheme crosses the River Dodder corridor with amenity grassland, wooded walkways, before returning to the urban transport corridor that is largely lined for much of its length by residential and commercial development lining both sides of the roads with occasional gardens and or streetscape planting, as well as parking areas in area such as Terenure.

- 8.181. In addition to the above, an alternative quiet street cycle facility will be provided along Harold's Cross Road / Terenure Road North between Terenure Cross and Parkview Avenue, as well as along Bushy Park Road, Wasdale Park, Wasdale Grove, Zion Road and Orwell Road. These areas are characterized by suburban and urban built environment with some treelines, hedgelines and amenity grassland verges throughout.
- 8.182. Freshwater habitats are present adjacent to sections of the Proposed Scheme, including the River Dodder which is crossed twice by the Proposed Scheme and the Grand Canal, which is crossed once along the existing road bridge at Rathmines Road lower / Richmond Street.
- 8.183. The Zol of the Proposed Scheme in relation to terrestrial habitats is generally limited to the footprint of the Proposed Scheme, and the immediate environs. The applicant acknowledges within the EIAR that Hydrological and Air Quality impacts can cause effects to biodiversity at significant distances from the development boundaries. The potential for significant effects is therefore considered within a wider zone of influence for these two issues.
- 8.184. Air quality Zol is set depending on the activity i.e 50 m from proposed scheme, 500m from construction compound during construction phases and 200m proposed scheme boundary or local road networks experiencing a change in AADT (Annual Average Daily Traffic) flows greater than 1,000 during the Operational Phase.
- 8.185. The Zol for aquatic plant and animal species includes all estuarine habitats located downstream of where the Proposed Scheme will drain to the proposed crossing points (these are outlined in Table 12.4 of the EIAR) and the marine environment of Dublin Bay.

8.186. The Zol for impacts to aquatic fauna species, such as Atlantic salmon *Salmo salmar* and lamprey species *Lampetra spp*, is limited to those water courses that will be crossed by the Proposed Scheme or water bodies to which runoff from the Proposed Scheme could drain to during construction and operation.

8.187. Zol for other species are as follows:

- Pygmy shrew – 100m from proposed scheme boundary
- Otters, badgers, stoat, and hedgehogs – extends to greater distances and breeding sites is 150m from boundary of scheme.
- Bat roost – 200m which can be adjusted accordingly depending on species. Habitat severance could extend for several kilometers.
- Breeding birds – *ex-situ* up to 300m.
- Amphibian species – direct habitat loss/ severance and indirect impacts to water quality in wetland habitats.
- Common Lizard – direct habitat loss and severance / displacement during construction.

8.188. Overall, it is clear that the determination of the zone of influence differs depending on the construction and operational activity.

8.189. It is important to note at this juncture that the proposed development does not fall within the boundary of any European sites, Ramsar Sites, designated NHAs, Nature reserves or Biosphere Reserves. The nearest European sites in Dublin Bay are South Dublin Bay and River Tolka Estuary SPA and South Dublin Bay SAC, which are located approximately 3.2km downstream of the closest point of the Proposed Scheme to the Liffey Estuary Upper. The Proposed Scheme is also hydrologically connected to the Wicklow Mountains SAC (via the River Dodder and the Owenadoher River), located approximately 6.1km upstream from the Proposed Scheme.

8.190. There are nine European sites located in Dublin Bay which are downstream of the Proposed Scheme. These sites include North Dublin Bay SAC, South Dublin Bay SAC, North Bull Island SPA, South Dublin Bay and River Tolka SPA, Howth Head SAC, Howth Head Coast SPA, Rockabill to Dalkey Island SAC, Dalkey Islands SPA and North West Irish Sea cSPA. European sites are hydrologically connected to the Proposed Scheme via the River Dodder, the Owenadoher River, the Grand Canal, the

Liffey Estuary Upper and Lower and Ringsend Wastewater Treatment Plant. In addition, Wicklow Mountains SAC is located upstream of the Proposed Scheme and is hydrologically connected to the Proposed Scheme via the Dodder_050.

8.191. There are two European sites containing marine mammals which are known to frequent Dublin Bay and the Liffey Estuary Lower namely; Rockabill to Dalkey Island SAC and Lambay Island SAC.

8.192. There are 27 no. European sites (SACs or SPAs) located within the vicinity of the Proposed Scheme, of which 18 no. are located within the Zol. Each site, their distance to the Proposed Scheme and their designations (QIs / SCIs) are listed in Table 12.5 and illustrated in Figure 12.3 in Volume 3 of the EIAR. I note for the attention of the Board the inclusion and consideration of North West Irish Sea c.SPA. See also section 7.0 'Appropriate Assessment' Section of this report above. All European Sites within the zone of influence of the proposed scheme are outlined and examined within the Appropriate Assessment Section of this report and will not be repeated hereunder. Sites within the Zol are highlighted in Table 12.5 of the EIAR. It is confirmed that, for the purposes of the EIAR, these European sites are all valued as being of International Importance. All other sites such as designated RAMSAR sites and Special Amenity Area Orders are recognised and considered in the context of the proposed development within the EIAR.

8.193. In order to establish biodiversity baseline conditions, the applicant carried out numerous walkovers of the site and carried out detailed mammal, bird, bat, reptile and amphibian surveys of the route and the surrounding areas. Habitat surveys were carried out by Scott Cawley Ltd. between June and August 2018, and August and October 2020. Confirmatory surveys were subsequently undertaken on the Proposed Scheme again in May and August 2022 to check and update the presence and extent of habitats found in the 2018 and 2022 habitat surveys. Aquatic habitat surveys were undertaken by Triturus Environmental Ltd. during October and November 2020.

8.194. As mentioned above habitats and species encountered are typical of that within developed urban environments of significance to the proposed development and I note that surveys and desk top studies did not record any evidence of the following within the development boundary of the proposed scheme: common lizard, common frog, smooth newt or marsh fritillary butterfly (in the study area). I also note that no red listed mollusc species or white-clawed crayfish were recorded during the aquatic surveys

conducted on the River Dodder (Triturus Environmental Ltd., 2020). The desk study (see Appendix A12.1 in Volume 4 of this EIAR), returned records of glutinous snail *Myxas glutinosa*, iridescent pea mussel *Pisidium pulchellum* and false orb pea mussel *Pisidium pseudosphaerium* along the Grand Canal at Herbert Place in 2003. This location I note is outside of the proposed scheme boundary.

Atlantic Salmon

8.195. The River Dodder is known to support populations of Atlantic salmon and brown trout and aquatic surveys undertaken for the Proposed Scheme indicated excellent salmonid habitat at the site surveyed (CBC1012AR001). In addition, aquatic surveys undertaken along stretches of the Owenadoher River also indicated good salmonid habitat with brown trout being plentiful at each of the three areas surveyed. Given that salmonid species are protected under both national and international legislation, habitat degradation, as a result of effects on surface water quality on the River Dodder or Owenadoher River during construction or operation, has the potential to result in a significant effect at the County level on salmonid species. River lamprey and brook lamprey, two legally protected lamprey species, are known to occur in the River Dodder. I note that no instream works are proposed in either the Dodder River or the Owenadoher River and that mitigation measures have been designed to protect water quality during construction and operational phase. Such measures will prevent additional sediment release to the Dodder and Owenadoher Rivers and other surrounding watercourses therefore protecting aquatic species from dis-improvements in water quality.

Eel

8.196. Results of the aquatic surveys carried out by Triturus Environmental Ltd in 2020 indicated that the River Dodder and Owenadoher River offer moderate quality eel habitat. In addition, the results of the desk study revealed that eel is known to occur in the River Dodder, in sites adjacent to and downstream of the proposed Scheme. Moreover, the Liffey Estuary serves as the gateway for eels migrating between freshwater and ocean environments, providing the necessary habitat for their transition. Habitat degradation, as a result of effects on surface water quality during construction, has the potential to result in a significant effect at the County level on eel, given the presence of suitable habitat and declining trend of eel in Irish waters.

8.197. With regards all other fish species, the effects of habitat degradation as a result of effects on surface water quality during construction has the potential to result in a significant effect at the local level given the fact that the other fish species in question are common in Irish waters and not of conservation concern. As with the foregoing, mitigation measures have been designed to protect water quality during construction. I highlight that the implementation of SuDs measures will prevent additional sediment release to the river and other surrounding watercourses therefore protecting aquatic species from dis-improvements in water quality.

Invertebrates – Freshwater Molluscs

8.198. The desk study revealed records for three Red Listed freshwater molluscs, glutinous snail, iridescent pea mussel and false orb pea mussel, along the Grand Canal at Herbert Place. By virtue of the design of the Proposed Scheme and / or the nature of watercourses intersected by it, I highlight however that the Proposed Scheme will not result in the any direct permanent loss of aquatic habitat nor result in a barrier effect in respect of aquatic invertebrates.

Habitat Degradation – Surface Water

8.199. Habitat degradation as a result of effects on surface water during operation is not predicted to affect the conservation status of aquatic or wetland bird species and will therefore, not result in a significant negative effect, at any geographic scale.

Otter

8.200. As set out above in section 7.0 of this report although not recorded during the field surveys, otter are considered to be present throughout the Grand Canal within Dublin City. Wicklow Mountains SAC, which is located approximately 8.6km upstream of the Proposed Scheme (from the Dodder_040 proposed crossing point), is the closest European site designated for otter. Typically, otter territories are within the range of 7.5km for females and up to 21km for males (Ó'Neill et al., 2009). The Proposed Scheme interacts with the following watercourses: the River Dodder, Owenadoher River, and Liffey Estuary Lower. Whilst these watercourses lie within the typical territorial ranges of otters, none of them share any hydrological connection to the Wicklow Mountains SAC – it is the River Dodder which provides the key hydrological pathway between the Wicklow Mountains SAC and Dublin City. In addition, the Wicklow Mountains SAC lies within the Dodder_SC_010 sub-

catchment and the Proposed Scheme lies within the Liffey_SC_090 sub-catchment. Therefore, Wicklow Mountains SAC may fall within the range of SCI otter, and as such, otter populations within the footprint of the Proposed Scheme could potentially be connected to the SAC population.

8.201. The AA section of this report concludes, however, that based on the information provided, I am satisfied that adverse effects can be excluded for Wicklow Mountains SAC. No habitat loss will occur. Adverse effects to the otter population from loss of habitat, noise disturbance, lighting and excavations can be effectively prevented by pre-construction check of all suitable otter habitat and by mitigation measures ensuring the protection of the Otter. See Table 6 above: 'AA summary matrix for Wicklow Mountains SAC'.

8.202. Notwithstanding the foregoing it is proposed to carry out preconstruction confirmatory surveys in order to ensure that such species are not affected by the proposed construction works. The implementation of SUDs will ensure the avoidance of habitat degradation for mammals that utilise the river banks. Such measures will also prevent additional sediment release to the river and other surrounding watercourses therefore protecting aquatic species from dis-improvements in water quality.

Potential Impacts in relation to bats

8.203. Bat surveys were carried out across four bat survey seasons between 2018 and 2020 and at three transects within the footprint of the Proposed Scheme (see details in section 12.3.8.1 of EIAR) with the following species recorded:

- Leisler's bat
- Common Pipistrelle
- Soprano pipistrelle
- Unidentified Pipistrelle Species
- Myotis bat species

8.204. Leisler's bat was recorded in six of the seven transects surveyed between 2018 and 2020; CBC1012BT001 (La Touche Bridge), CBC1012BT002 (Pearse Bridge), CBC1012BT004 (Rathfarnham Castle), CBC1012BT005 (Owendore Crescent), CBC1012BT006 (Terenure College) and CBC1012BT007 (Dodder Valley Park). A total of 32 bat passes, attributed to Leisler's bat, were recorded in these locations

between 2018 and 2020. It is important to note that no roost sites for Leisler's bat were recorded during any of the surveys for the Proposed Scheme. The desk study found that Leisler's bat is known to occur in the wider study area and utilise foraging habitat within the greater Dublin area.

8.205. Common pipistrelle bats was recorded in all of seven transects surveyed between 2018 and 2020. A total of 134 bat passes, attributed to common pipistrelle bat, were recorded in these locations between 2018 and 2020. Common pipistrelle bat activity was highest at CBC1012BT002 (Pearse Bridge). 91 bat passes, attributed to this species, occurred here: 71 bat passes in the spring survey of 2020 and 20 in summer of 2018. A total of 46 recordings attributed to common pipistrelle bats were recorded during summer 2018 surveys, 24 along CBC1012BT001 (La Touche Bridge), 20 along CBC1012BT002 (Pearse Bridge), one along CBC1012BT004 (Rathfarnham Castle) and one along CBC1012BT006 (Terenure College). No roost sites for common pipistrelle bat were recorded during any of the surveys for the Proposed Scheme.

8.206. Soprano pipistrelle bat was recorded at five of the seven transects surveyed between 2018 and 2020; CBC1012BT002 (Pearse Bridge), CBC1012BT003 (Bushy Park), CBC1012BT005 (Owendoher Crescent), CBC1012BT006 (Terenure College) and CBC1012BT007 (Dodder Valley Park). A total of 248 bat passes, attributed to soprano pipistrelle bat, were recorded in these locations between 2018 and 2020. No roost sites for soprano pipistrelle bat were recorded during any of the surveys for the Proposed Scheme.

8.207. Unidentified pipistrelle bat passes were recorded in three locations surveyed between 2018 and 2020; CBC1012BT002 (Pearse Bridge), CBC1012BT003 (Bushy Park) and CBC1012BT006 (Terenure College). A total of 34 unidentified bat passes were recorded in these locations between 2018 and 2020. No roost sites were recorded.

8.208. Myotis bat species were identified in two of the seven transects surveyed between 2018 and 2020; CBC1012BT002 (Pearse Bridge) and CBC1012BT003 (Bushy Park), both of which lie adjacent to the River Dodder. No roost sites for any Myotis bat species were recorded during any of the surveys for the Proposed Scheme.

8.209. There are no confirmed bat roosts located within the footprint of the Proposed Scheme. 12 potential roost features (PRFs) were recorded within the footprint of the proposed scheme, 9 of which are trees. PRFs, are listed in Table 12.8 and shown on Figure 12.7.2 in Volume 3 of the EIAR. Four of the trees containing PRFs will be

removed, two sycamores, one oak and one yew. It will not, however, result in the loss of any known breeding / resting sites for any bat species. Therefore, in the absence of mitigation, there is potential for the felling of these trees to result in direct harm and pose a mortality risk to bats, should bats be present in the trees at the time of felling. This could result in a significant effect on the conservation status of bats at the local geographic level.

8.210. In term of habitat degradation and fragmentation it is stated that notwithstanding the fact that there is evidence of bats foraging and commuting within the study area, particularly along the River Dodder at Pearse Bridge in Rathfarnham (CBC1012BT002) and adjacent Bushy Park (CBC1012BT003). All parts of the scheme which contain suitable habitat are likely to be within the CSZ of at least one bat roost. Considering the type of works proposed (e.g., upgrading of existing infrastructure for the most part), there is limited potential for the proposed scheme to act as a barrier to flight paths for bat species, as there will be no major changes to pre-existing habitats along most of the route.

8.211. As set out above, it is acknowledged that the scheme will result in some loss and / or fragmentation of existing habitat used by local populations of commuting / foraging bats, removal/ fragmentation of small areas / strips of woodland, amenity grassland, scattered trees and parkland, treelines and hedgerows which could all be used by local bats. Proposed works along the boundary of Rathfarnham Castle, comprising the relocation of the boundary wall, will result in the removal of the outermost section of mixed woodland (WD1) at this location. Habitats such as mixed woodland, may be used by foraging and commuting bats in the area. Given the peripheral nature of the section of woodland to be removed here and considering the extent of this habitat which will be retained, this will not result in any significant impact on local bat species.

8.212. I highlight that removal of suitable habitat for foraging and/commuting bats within the footprint of the Proposed Scheme is calculated as approximately 2.6ha. Habitat removal is within a highly disturbed urban environment with low numbers of species records, and, as such is not deemed to provide significant contributions to core sustenance zones of roosts outside of the footprint of the Proposed Scheme. The effect of habitat fragmentation and barrier effect associated with the construction of the Proposed Scheme is therefore considered to be significant at the local level only.

8.213. An additional potential impact to bats arises from the introduction of artificial lighting within suitable habitat may result in avoidance behaviour by bats and could prevent bats from accessing foraging areas or roosts and/ or result in bats taking more circuitous routes to get to foraging areas and hence potentially depleting energy reserves and result in abandonment of nearby roosts. Given the urban setting of these proposed site compounds, it is considered that bats in the area would be habituated to some level of artificial lighting and the impact of increased artificial lighting at construction compounds is considered to be significant at the local level only.

8.214. It is stated that construction works will typically be undertaken during normal daylight working hours, and therefore the requirement for lighting to accommodate construction works during night-time, in many areas where existing light levels are low, will be limited.

Mitigation in relation to Bats

8.215. Mitigation measures proposed include, pre-construction surveys (of all trees identified as containing PRFs or not to be removed within the boundary of the Proposed Scheme shall be rechecked for PRFs), retention of vegetation and protection of trees with potential for roosting and the use of low lux directional lighting. There will be no additional lighting within 5m of any PRF tree during the Construction Phase. An application will then be made to the National Parks and Wildlife Service for a derogation licence to permit actions affecting bats or their roosts. After licence approval from the NPWS (which may include the necessity for additional mitigation measures to those recommended here) bats may be removed by a bat specialist licenced to handle bats and released in the area in the evening following capture; and only then will PRF trees be felled and this shall be undertaken 'in sections' where the section can be handled to avoid sudden movements or jarring of the sections. In addition to mitigation proposals that may arise as result of the pre-construction survey (e.g. emergence surveys and confirmation of roost), it is proposed to install generalist / self-cleaning bat boxes for each PRF tree that is confirmed to be removed.

8.216. To mitigate loss of habitat, the following proposed planting will be incorporated into the Proposed Scheme:

- 400 trees planted;

- 126.4m of proposed hedgerow;
- 7,300 m2 of proposed species rich grassland;
- 932 m2 of proposed ornamental planting; and,
- 9,212 m2 of proposed amenity grassland planting.

8.217. Overall, given the limited level of bat activity within the vicinity of the proposed works, the absence of any roost sites and the mitigation measures proposed above, I am satisfied that the proposed development will not result in any bat mortality. I also note that works will be carried out during daytime hours and will therefore not result in disturbance to emergence patterns in the area.

Badger

8.218. No evidence of badger (e.g., setts or evidence of badger activity) were recorded within the footprint of the Proposed Scheme, during the multi-disciplinary surveys undertaken. Evidence of badger was however recorded at two locations within the vicinity of the Proposed Scheme; potential burrows were identified within approximately 50m of Pearse Bridge and trails were recorded within approximately 120m of the Proposed Scheme near Owendore Crescent. Badger are widely distributed throughout the Greater Dublin Area (GDA), often utilising public parks and residential gardens. The River Dodder, Bushy Park, and associated green spaces / residential gardens are also known to support a number of badger populations. Badger and their young have been observed foraging within the vicinity of Bushy Park. The desk study returned 18 records of badger, including several live sightings, within 1km of the Proposed Scheme (see Appendix A12.1 in Volume 4 of the EIAR for further details). Records from within close proximity to the Proposed Scheme include those from areas such as Rathfarnham, Templeogue, Milltown, and Rathgar. As such, it has been assumed that badger may occur in vegetated areas adjacent to the Proposed Scheme.

Mitigation in relation to Badger

8.219. To protect badgers from indirect harm during construction, where practicable, open excavations will be covered when not in use and backfilled as soon as practicable by the appointed contractor. Excavations will also be covered at night, where

practicable, and any deep excavations which must be left open will have appropriate egress ramps in place to allow mammals to safely exit should they fall in.

8.220. Overall, given there were no signs of badger recorded within the vicinity of the proposed works, and the mitigation measures proposed above, I am satisfied that the proposed development will not result in any badger mortality. I also note that works will be carried out during daytime hours and any nighttime light spill will be minimised.

Potential Impacts in relation to birds

8.221. It is important to note that the applicant has examined the potential for impacts to arise in relation to overwintering and breeding bird species within the Appropriate Assessment section of this report (see section 7.0 above) and as such in the interest of conciseness these details will not be repeated hereunder, and accordingly this section of the report should be read in conjunction with the Appropriate Assessment, above, in relation to SCI bird species.

8.222. The scheme will result in the loss of some breeding bird nesting and foraging habitat within the footprint of the proposed scheme. The areas of habitat loss within the Proposed Scheme boundary are provided in Section 12.4.3.2 and tabulated in Table 12.14 for all KER (Key ecological receptors) habitat types. These areas comprise a total area of approximately 0.78ha of hedgerows (WL1) and treelines (WL2) (also KERs), mixed broadleaved woodland (WD1) (KER) and approximately 0.05ha of scattered trees and parkland (WD5) habitats. In addition, there are areas of scrub (WS1), ornamental / non-native shrub (WS3) and amenity grassland (GA2) within the footprint of the Proposed Scheme, which are not KERs in their own right due to their limited botanical value. However, these habitats may provide nesting and / or foraging habitat for birds (approximately 3.4ha). These areas will be removed during construction of the Proposed Scheme resulting in an additional loss of breeding bird nesting and / or foraging habitat. In summary, the habitats that may be lost comprise:

- Treeline habitat located along R115 / R821 bordering Rathfarnham Castle Park;
- Treeline road median habitat along the R114 Rathfarnham Road adjacent to Rathfarnham Village;

- Residential Hedgerow / Treeline habitat along the R114 Rathfarnham Road south of Pearse Bridge;
- Hedgerow habitat along the R114 Rathfarnham Road between Pearse Bridge and Beechlawn Way;
- Hedgerow habitat along the R114 Terenure Road East, between Terenure Road North and Brighton Road;
- Mixed broadleaved woodland habitat along the R137 Templeogue Road at the entrance to Templeogue House;
- Residential hedgerow/ treeline habitat along the R137 Templeogue Road, east of Austin Clarke Bridge;
- Vegetation removal along the R137 Templeogue Road at Bushy Park (trees to be retained in this area, only understorey vegetation to be removed); and,
- Amenity grassland along the R112 Dodder View Road, adjacent to the Bushy Park Carpark, to accommodate the proposed Construction Compound TR3.

8.222.1. Potential impacts may arise due to the direct short-term loss of feeding habitat including a grassland area along the R112 Dodder View Road adjacent to Church Lane and the Bushy Park Carpark (approximately 0.455ha in total area), to accommodate the proposed Construction Compound TR3. Numbers recorded, however, during wintering bird surveys undertaken here suggest that the site is not a significant wintering bird site, and that there is considerable potential for other sites for wintering birds in the wider vicinity.

8.222.2. Treelines and hedgerows are highly disturbed, and largely within the road median, therefore do not offer significant shelter for breeding bird species. The habitat areas that will be lost as a result of the Proposed Scheme form a relatively small part of larger expanses of similar habitat types and mosaics in the wider locality. Parks and greenspaces form a vital resource for breeding birds within an urban setting. These areas of suitable breeding bird nesting and / or foraging habitat available in the wider locality of the Proposed Scheme (i.e., from approximately 0.3 to 2km from these existing sites located within the footprint of the Proposed Scheme) include: Castle Golf Club, Milltown Golf Club, Bushy Park, Tymon Park, Dodder Riverbank, Orwell Park, Terenure College, Templeville Park, St. Mary's College

RFC, Harold's Cross Park, Mount Argus Park, Eamonn Ceannt Park, Kenilworth Square, Palmerstown Park, Templeogue Synge Street GAA Club, Iveagh Gardens and St. Stephens Green, Orwell Park, Upper Liffey Estuary, Lower Liffey Estuary and wider Dublin Bay area. Impacts to birds in this regard are not expected to be significant.

- 8.222.3. All of the affected habitats have been surveyed, it is not likely significant effects on breeding birds will occur give the scale of impact upon vegetation. There may be a temporary effect on breeding birds at a local scale, until such a time that they have established new nesting sites. Although the Proposed Scheme is predicted to have a long-term effect on local breeding bird populations, even at a local level this is not predicted to affect the ability of local breeding bird species to persist within their current ranges or to maintain their populations long-term. Therefore, the Proposed Scheme is not likely to affect the conservation status of breeding bird species and will not result in a significant negative effect, at any geographic scale.

Potential Impact in relation to Aquatic species

- 8.223. Habitat degradation in relation to surface water quality has also been examined in detail within the Appropriate Assessment and Water Section of this report and subject to mitigation and the implementation of SuDs measures no significant impacts to water quality or aquatic species are expected.

Potential Impacts in relation to Plant Species

- 8.224. No protected plant species listed on the Flora (Protection) Order, 2015 were recorded within or in close proximity to the Proposed Scheme. The desktop study did not reveal any records for rare and / or protected species in close proximity to the Proposed Scheme. Therefore, there is no potential for impacts on rare / protected species, as a result of the operation of the Proposed Scheme.

Invasive Plant Species

- 8.225. There were no non-native invasive plant species listed on the Third Schedule of the Birds and Habitats Regulations identified along the Proposed Scheme. Ten areas of invasive plant species (Japanese knotweed, Himalayan balsam and three-cornered garlic, species) are present within close proximity to, the Proposed Scheme. Locations are set out in Table 4 of the NIS and include locations: along the River Dodder at

Pearse Bridge in Rathfarnham adjacent to the western & eastern side of Pearse Bridge, on the northern bank of River Dodder, along River Dodder edge at Austin Clarke Bridge, along the banks of the Owenadoher River, along the River Dodder beside Bushy Park pond and on southern bank of the River Dodder.

8.226. It is acknowledged by the applicant that such species pose a significant threat to biodiversity and as such it is proposed to carry out preconstruction surveys. An Invasive Species Management Plan has been prepared to outline the strategy that will be adopted during the Construction Phase of the Proposed Scheme in order to manage and prevent the spread of the non-native invasive plant species. This approach is common practice and known to be effective in the management of invasive species. I am therefore satisfied that the proposed development will not give rise to the spread of invasive species within or outside of the site boundaries.

Potential Impacts Operational Phase

8.227. There are no significant effects expected during the operational phase of the development in relation to biodiversity. Measures such as the implementation of SUDs, directional lighting to protect bats, addition of bat boxes and monitoring and a management plan for invasive plant species will prevent any impacts of significance from arising.

Residual Impacts

8.228. It is important to note that the EIAR within section 12.6 outlines the residual likely significant effects of the proposed development on all birds, bats, mammals, aquatic and plant species. The Board should note as outlined above that no protected species with the exception of a small number of bats commuting were found within the works area which comprises an urban carriageway within the city and suburbs and mitigation in the form of pre-construction surveys, protection of waterways and water quality are considered to prevent significant impacts from arising to species.

8.229. In this context I draw the Board's attention to table 12.19 of the EIAR in which residual impacts are for the most part not expected to be significant. However, I note in relation to grassland, scattered trees, hedgerows, treelines, bats, badger, otter and all other breeding bird species residual effects are expected to be significant at a local level. While I accept that the removal of vegetation can be identified as having a significant effect, I consider, given the limited level of removal in the context of the significant

replanting scheme, overall the impact will be insignificant. The applicant has clearly stated that 4 number trees identified as having potential roosting features (PRF's) for bats will be removed. The further preconstruction surveys, derogation licence requirement, provision of bat boxes and lighting mitigation proposed.

8.230. Albeit, the river Dodder adjacent to the proposed scheme is within foraging distance for otters, none were encountered and similarly preconstruction surveys will be undertaken to ensure that impacts do not arise. In this regard I note condition 4 proposed to be attached to any grant of planning permission forthcoming from the Board.

8.230.1. Marine mammals (otter and seal) have been recorded commuting and foraging within the Liffey Estuary Lower, in the vicinity of the Proposed Scheme. Direct impacts on marine mammals may potentially occur during pilling and estuary reclamation if marine mammals are very close to the proposed construction site. A suite of mitigation measures that will be implemented during construction and operation of the Proposed Scheme to avoid the potential impacts on marine mammals have been adapted from the Marine Mammal Risk Assessment (IWDG 2020). No evidence of other protected mammals was recorded during surveys. Given the above and having regard to the mitigation measures proposed to ensure no significant effects arise in this regard, I am satisfied that that effects of the scheme to biodiversity will not be significant.

8.231. I note DCCs requirement in relation to the restriction of vegetation removal during the bird breeding season and am satisfied that this can be adequately dealt with by way of condition.

8.232. Thus having regard to the foregoing, and having considered the written submissions made in relation to biodiversity and the relevant contents of the file including the EIAR. I am satisfied that the potential for impacts on biodiversity can be avoided, managed and/or mitigated by measures that form part of the proposed scheme, by the proposed mitigation measures and with suitable conditions. I am therefore satisfied that the potential for direct or indirect significant impacts on biodiversity can be ruled out. I am also satisfied that cumulative effects, in the context of existing and permitted development in the surrounding area and other existing and proposed development in the vicinity of the site, are not likely to arise.

Table 12 Biodiversity - Summary of potential & residual effects

Potential impacts	Magnitude of Impact	Mitigation	Residual Impact
Construction Phase on European sites	Likely significant effect at the international geographic scale	Refer to section 9.5.1 for the range of mitigation measures which will be adapted at specific working areas to reduce impacts upon biodiversity. See also CEMP, for fuels to be stored in bunded areas, no stockpiling near watercourse, Implementation of SUDs measures and attenuation.	None of significance.
Construction Phase Local biodiversity	Likely significant effect at the local geographic scale	Pre construction surveys, protection of trees and vegetation.	Likely significant effect at the county geographic scale.
Operational Phase on European Sites	Likely significant effect at the international geographic scale	Implementation of SUDs measures and attenuation.	None of any significance.
Operational phase Local biodiversity	Potential for Likely significant effect at the international geographic scale	Implementation of SUDs measures and attenuation. Directional lighting and monitoring and management of invasive plant species.	None of any significance.

Water

8.233. Section 13 of the EIAR submitted examines the potential for impacts to arise in relation to hydrology. As outlined above in section 3.0 of this report, the proposed scheme is essentially an upgrade to the existing bus priority and cycle facilities along two main alignments, namely from Templeogue to Terenure (3.7km), and from Rathfarnham to the City Centre (6.3km). The study area lies within Hydrometric Area (HA) 09 (Liffey and Dublin Bay) and is covered within the River Liffey catchment. The Liffey and Dublin

Bay Catchment Summary (Liffey Catchment Assessment 2010 – 2015 (HA 09) (EPA 2018) describes this catchment as including the area drained by the River Liffey and by all streams entering tidal water between Sea Mount and Sorrento Point, County Dublin, draining a total area of 1,616km². There are four main waterbodies within the study area in this catchment: the Liffey Estuary Upper, the Dodder_040, Dodder_050, Owenadoher_010 and the Grand Canal Main Line (Liffey and Dublin Bay also referred to as the Grand Canal in the EIAR). The largest urban centre in the catchment is Dublin City. The other main urban centres relevant to the study area are Harold's Cross, Rathmines, Terenure, Templeogue and Rathfarnham. The Liffey and Dublin Bay catchment contains the largest population (approximately 1,255,000) of any catchment in Ireland and is characterised by a sparsely populated, upland south eastern area underlain by granites and a densely populated, flat, low lying limestone area over the remainder of the catchment basin. The majority of the population in the catchment is in this low-lying limestone area which is also heavily urbanised and industrialised.

Baseline Conditions

8.234. The waterbodies examined for the purpose of EIA for the proposed scheme include the following:

- Liffey Estuary Upper;
- Dodder_040
- Dodder_050
- Owenadoher_010; and
- Grand Canal (Grand Canal Main Line (Liffey and Dublin Bay))

8.235. The WFD Status of the rivers and streams within the study area of the Proposed Scheme are detailed in Table 13.7 of the EIAR.

8.235.1. As set out previously, the proposed scheme crosses the river Dodder, the Grand Canal and a historic millrace, the Whitechurch Stream (locally known as the River Glin) which discharges via a concrete pipe into the Owendoher River, due west of road bridge over the watercourse at Butterfield Avenue. However, there are no direct connections to the waterbodies listed. With the exception of the minor works

to the millrace described above, all hydrological connections to these remaining waterbodies are via the sewer system and roadside gullies.

8.236. I draw the Board's attention to Appendix A13.1 in Vol 4 of the EIAR which contains a Water Framework Directive Assessment report. It is concluded within this report that the proposed scheme will not compromise progress towards achieving GES (Good Ecological Status) or cause a deterioration of the overall GEP (Good Ecological Potential) of any of the water bodies that are in scope. The WFD also requires consideration of how a new scheme might impact on other water bodies and other EU legislation. The following assessment will examine the potential for the proposed development to impact waterbodies within the study area. The Board should note that an Appropriate Assessment has been carried out as outlined above and considers the impact to other EU legislation accordingly.

Potential Construction Impacts

8.237. The potential for impacts to arise in relation to these water bodies is summarised hereunder and the magnitude of any effects stated. The Board should note that the effects listed hereunder relate to the construction phase of the development, operational effects will be considered separately.

- **Dodder_040 & Dodder_050.** The River Dodder has a total catchment area of 167.7km². It rises on the northern flanks of the Dublin Mountains, flowing 26km north through the Upper and Lower Glenasmole reservoirs and through South Dublin, before becoming tidal near Lansdowne Road and entering the River Liffey at Ringsend. The Dodder_040 will not be crossed by the Proposed Scheme but is in close in proximity (the red line boundary extends to a bridge which then crosses this water body) at Cypress Road where it becomes Old Bridge Road. The Dodder_050 will be crossed by the Proposed Scheme twice; at Rathdown Road and at Dodder Road Lower.
 - Widening and Junction Upgrade
 - Construction Compound TR1
 - Construction Compound TR6
 - Carriageway widening Rathdown Avenue to Terenure Junction
 - Construction Compound TR3 at Dodder Park

Increased surface water runoff; Increased sediment in runoff; Anthropogenic sources (fuel etc.)

Magnitude of effects - **Short-term, adverse Moderate/Slight to Short-term, adverse Moderate/Significant.**

- **Owenadoher_010** - consists of branches which rise in the Glendoo and Kilakee Mountains and flow northwards through Whitechurch and Rathfarnham before converging at Willbrook and flowing into the Dodder_050.

Increased surface water runoff; Increased sediment in runoff; Anthropogenic sources (fuel etc.)

- Widening and new boundary wall Grange Road to Dodder Park Road.

Magnitude of effects - **Short-term, adverse Moderate**

- **Grand Canal (Grand Canal Main Line (Liffey and Dublin Bay))** - is an artificial waterbody, primarily used for recreation. Constructed in the 18th century, the grand Canal traverses the country from Dublin to Shannon for approximately 131km. The Proposed Scheme will cross the Grand Canal approximately 1km north of Rathmines. Good Ecological Potential.

- Minor alignment Rathgar Road to Cuffe Street.

Increased surface water runoff; Increased sediment in runoff; Anthropogenic sources (fuel etc.)

Magnitude of effects - **Short-term, adverse Imperceptible.**

- **Liffey Estuary Upper** - is a transitional waterbody and is within the Liffey Nutrient Sensitive Area. It is located at the northern extent of the proposed Rathfarnham Section of the Proposed Scheme. The River Liffey is considerably constrained by quay walls through Dublin City Centre. Within the study area there are at least three river crossings including the Grattan Bridge, the Millennium Bridge, Ha'penny Bridge. There are a further two river crossings within 500m of the Proposed Scheme, these are the O'Connell Bridge and the O'Donovan Rossa Bridge. The Proposed Scheme will not cross Liffey Estuary Upper.

- Minor alignment works at Cuffe Street to Dame Street.

Increased surface water runoff; Increased sediment in runoff; Anthropogenic sources (fuel etc.)

Magnitude of effects – **No Impacts**

Potential Operational impacts

8.238. The potential impacts for the Operational Phase are related to water quality and hydromorphology only. No potential changes to hydrology are predicted as the drainage design ensures no net increase in runoff rates. The magnitude of effects to the waterbodies listed above is of imperceptible significance. The Board should note that it is proposed to incorporate SUDs measures (attenuation tanks and swales) into the proposed scheme along the entirety of its length. Such works will have a positive impact on the receiving waters surrounding the proposed scheme.

- **Dodder_040 & Dodder_050.** No hydrological connection from the Proposed Scheme to the Dodder River during the Operational Phase, therefore there are no impacts from that source.

Magnitude of effects: **Permanent beneficial and Imperceptible.**

Owenadoher_010. The impermeable area in the road corridor area draining to the Owenadoher River increases by 1,405m². This increase in impermeable area will be attenuated using tree pits, oversized pipes and filter drains. As a result, there will be no net increase in runoff to the water body. Some improvement in water quality may be observed as a result of the SuDS being employed. This has the potential to lead to permanent, beneficial impacts of negligible magnitude.

Magnitude of effects: **Permanent beneficial and Imperceptible.**

- **Grand Canal (Grand Canal Main Line (Liffey and Dublin Bay))** - No direct hydrological connection from the Proposed Scheme to the Grand Canal during the Operational Phase, therefore there are no impacts from that source.

Magnitude of effects: **Imperceptible significance.**

- **Liffey Estuary Upper** – No direct hydrological connection from the Proposed Scheme to the Liffey Estuary Upper during the Operational Phase, therefore there are no impacts from that source.

Magnitude of effects: **Imperceptible significance.**

8.239. It is important to acknowledge that there will be additional traffic flows on diverted routes both during the construction and operation of the phases of the proposed scheme. I have considered such changes and agree with the conclusions in this regard that the proposed development would result in an imperceptible impact to the water environment within these areas and will therefore not give rise to significant environmental effects.

8.240. Overall, I have considered the submissions and the contents of the application in relation to water and am satisfied having regard to the existing baseline environment and proposed mitigation measures that there will be no significant residual impacts on the hydrological environment within or connected to the proposed scheme.

Flooding

8.241. The applicant has carried out a flood risk assessment for the proposed scheme which is appended to the EIAR. It is notable at the outset that a stage 2 FRA was not required as the development is in an area of low risk. There are a number of historic flood events at different locations along or near to the Proposed Scheme. The Proposed Scheme is largely on existing roads and will result in minimal additional paved areas and will therefore not increase the risk of these events reoccurring compared to the current scenario. Two areas in Rathfarnham are at medium (1 in 100 year) and high risk (1 in 100 year) of flooding from the River Dodder and Whitechurch stream respectively. The areas consist of Area 1 on Rathfarnham Road near Dodder View Road which falls within flood zone B and Area 2 at Nutgrove Avenue falls within flood zone A. The rest of the route does not fall within any flood extents therefore is within Flood Zone C. The following is a summary of the potential for flooding along the scheme and the overall impact of the development in relation to each flood type.

8.242. **Pluvial Flooding** – There is a risk of pluvial flooding along the entire length of the proposed route. However, this risk will be reduced as a result of the Proposed Scheme. The scheme will result in the creation of additional impermeable surfaces for local sections of road widening. However, SuDS measures have been included, as a consequence of the scheme. This will ensure no increase in the risk of pluvial flooding as a result of the Proposed Scheme.

8.243. Fluvial Flooding – The site is located approximately 10 km from the nearest coastal boundary and elevated high above sea level. There is therefore no risk of coastal flooding to the site in the present, or future climate change scenario. The Proposed Scheme requires minimal changes to land cover and will likely have a negligible impact on the existing fluvial flood regime. The Proposed Scheme will not have adverse impacts or impede access to a watercourse, floodplain or flood protection and management facilities and will be flood resilient in design.

8.244. Climate Change – There will be an increased risk of fluvial flooding to the Proposed Scheme as a consequence of climate change, however, the Proposed Scheme will not exacerbate the impacts of climate change on the risk of fluvial flooding.

Conclusion

8.245. With regard to the foregoing, I have reviewed the drainage implications of the proposed development and note that the drainage design will ensure no net increase in surface water flow discharges. New surface water sewers are designed to provide attenuation for return period of up to 30 years where possible and the introduction of SuDs measures along the route will contribute to the management of fluvial flooding risk through the provision of surface water storage capacity in the network. The overall impacts in relation to flooding and water quality are positive along the route of the proposed scheme.

8.246. Mitigation measures proposed to control sediments, restrict storage of fuels to bunded areas and restrict the method of concrete use near to water bodies will ensure that accidental sediment and hydrocarbon release to waterbodies does not arise. The proposed scheme is expected to have an overall positive impact on water quality and is therefore in compliance with the requirements of the Water Framework Directive in that it will not cause a deterioration in status in any waterbody or prevent any waterbody from achieving good status.

8.247. I have considered all of the written submissions made in relation to water and the relevant contents of the file including the EIAR. I am satisfied that the potential for impacts on water can be avoided, managed and/or mitigated by measures that form part of the proposed scheme, by the proposed mitigation measures and with suitable conditions. I am therefore satisfied that the potential for direct or indirect impacts on water can be ruled out. I am also satisfied that cumulative effects, in the context of

existing and permitted development in the surrounding area and other existing and proposed development in the vicinity of the site, are not likely to arise.

Table 13 Water - Summary of potential & residual effects

Potential impacts	Magnitude of Impact	Mitigation	Residual Impact
<p>Increased sediment in run off;</p> <p>Contamination of water bodies with anthropogenic substances such as oil, chemicals or concrete washings.</p> <p>Anthropogenic sources (fuel etc);</p> <p>Increased scouring of watercourse</p> <p>Concrete washings.</p> <p>Re-exposure of historically settled contaminants</p>	<p>Imperceptible – moderate / slight to moderate /</p> <p>Significant to moderate</p>	<p>A Surface Water Management Plan (SWMP) has been prepared (See CEMP) – Construction Compounds Management including the storage of fuels and materials; to be stored in bunded areas no stockpiling near watercourse, management of vehicles and plant including refuelling and wheel wash facilities; and monitoring.</p> <p>The pouring of concrete will take place in dry weather only.</p> <p>Silt fences or similar will be installed to prevent overland flow into the canal or the Liffey Estuary Lower.</p> <p>Implementation of SUDs measures and attenuation.</p> <p>Monitoring.</p>	<p>None of any significance, Permanent beneficial Imperceptible</p>

Land, soil, geology and hydrogeology

8.248. Section 14 of the EIAR submitted addresses lands, soils, geology and hydrogeology.

Baseline Conditions

8.249. The land uses in the region are mainly comprised of urban developments including but not limited to; industrial, commercial, residential and recreational. Moving away from the City Centre there are also marine, agricultural and forested areas in the region. Geomorphology and topography are examined within the EIAR in order to give context to any potential changes to land, soils, geology, and hydrogeology that could influence the importance of a feature and the magnitude of any impacts.

8.250. The topography of the region is dominated by the Wicklow Mountains to the south with undulating topography to the north, west and east with localised highs generally synonymous with outcropping rock or near surface bedrock. There is a gradual drop in elevation across the region from west to east approaching the coast.

8.251. The Proposed Scheme is predominantly underlain by made ground over alluvium over glacial till over limestone bedrock. The topography of the proposed scheme is approximately 70m OD and 80m OD at Templeogue, falling to 50mOD at Nutgrove Avenue, 40 mOD at Terenure. The topography will remain at a consistent level ranging from 40mOD to 50mOD before gradually falling to between 20mOD and 30mOD between Terenure Road North and Harold's Cross and between 20mOD to 30mOD between Terenure Road North to Charleville Road.

8.252. The majority of the soils expected to be encountered within the study area are made ground comprising varying forms of hard standing materials including road pavements and footpaths with localised pockets of alluvium, till derived from limestones, and gravels derived from limestones. Localised pockets of topsoil are identified near the junction of the M50 interchange to the junction at Cheeverstown along the Templeogue Road, at Rathgar Park and at Rathfarnham Castle. Alluvium deposits are identified along the banks of the River Dodder.

8.252.1. The underlying bedrock of the study area is predominantly comprised of the Lucan Formation, a dark Carboniferous limestone and shale. There are no karst features identified within the study area.

8.252.2. Given the urban setting of the proposed development it was considered prudent to examine the potential for contaminated lands to be present within the route of the scheme. A number of sites were identified which included uses such as

service stations, historic tram depots and tramways, old quarries, old paper mills, old mill races and old cloth factories along the route, all are outlined within Table 14.24 of the EIAR.

Potential Construction Impacts

8.253. It must be stated at the outset that no significant impacts are expected to arise in relation to land, soil, geology and hydrogeology. Impacts are expected to occur in relation to the following:

- **Loss or damage of topsoil** – works giving rise to potential effects – contamination of soils due to spillage of concrete/hydrocarbons/bitumen sealants etc, excavations and soil stripping and construction machinery – magnitude of effects is expected to be **slight to imperceptible**.
- **Excavation of potentially contaminated ground** – Old Paper Mill, Old Mill Race, Old Ford Site, Dublin and Blessington Steam Tramway and Tram Depot Templeogue Road, Old Quarry Springfield Ave, Service Stations M50 Interchange, Fish Pond Rathfarnham Castle, Creek (Possible Millrace) Rathfarnham, Old Mill Rathfarnham Mill, Old Cloth Factory Dodder Park Road / Rathfarnham Road Junction, Old Mill Pond, River Dodder adjacent to the R112 Dodder View Road, Old Quarry Brighton Green, Old Quarry Rathgar Park, Old Tram Depot Terenure, Old Engineerinf Works Brighton Green, Service Station Rathgar Road / Grovenor Road & Rathfarnham Road / Crannagh Road works resulting in exposure of contaminated material – magnitude of effects - **slight**
- **Loss of future quarry or pit reserve** –
Crushed rock aggregate potential: Rathfarnham Village, Terenure Road North to Brighton Square, Charleville Road to Dam Street, Terenure Road North to Brighton Square.
Granular aggregate potential: South Great Georges Street, Banks of River Dodder and Owendoher River, Banks of River Dodder.
Magnitude of effects is expected to be **imperceptible**.

- **Loss or damage of proportion of Geological Heritage Area** - Greenhills Esker North of M50 Interchange, Dodder Terraces South/South West of M50 interchange, River Poddle Harold's Cross Road - Magnitude of impact **imperceptible**.
- **Loss or damage of proportion of aquifer** - Locally Important Aquifer (LI), minimal excavation into the limestone rock as part of the Proposed Scheme – magnitude of impact **imperceptible**.
- **Change to groundwater regime** - Locally Important Aquifer (LI) Localised pumping of excavations could lead to change in groundwater levels – magnitude of effects – **imperceptible / Moderate**.

Potential Operational Impacts

8.254. The Operational Phase has the potential to lead to occasional accidental leakage of oil, petrol or diesel, allowing contamination of the surrounding environment. The magnitude of the impact is **negligible**.

8.255. Standard mitigation measures are proposed in relation to the protection of soils, geology and geomorphology during construction and are outlined in section 14.5 of the EIAR and the CEMP accompanying the application. No additional mitigation measures are deemed necessary for the operational phase of the development. Consequently subject to the implementation of construction mitigation no residual effects are expected.

8.256. Cumulative impacts have been considered in this regard and given the nature of the proposed works are considered to be unlikely.

Conclusion

I have considered all of the written submissions made in relation to lands, soils, geology and hydrogeology and the relevant contents of the file including the EIAR. I am satisfied that the potential for impacts on lands, soil, geology and hydrogeology can be avoided, managed and/or mitigated by measures that form part of the proposed scheme, by the proposed mitigation measures and with suitable conditions. I am therefore satisfied that the potential for direct or indirect impacts on lands, soils, geology and hydrogeology can be ruled out. I am also satisfied that cumulative effects,

in the context of existing and permitted development in the surrounding area and other existing and proposed development in the vicinity of the site, are not likely to arise.

Table 14 Land, Soils, geology & hydrogeology - Summary of potential & residual effects

Potential impacts	Magnitude of Impact	Mitigation	Residual Impact
Loss or damage of topsoil	Slight	Prevention of leaks and spills of hydrocarbons and other chemicals.	Imperceptible
Disturbance of contaminated land	Slight	Licensed contractor will remove and dispose at licensed facility if encountered. Dewatering in such areas will be carried out in manner that reduces mobilisation of contaminants.	Imperceptible
Loss of future quarry or pit reserve	Imperceptible	None	Imperceptible
Loss or damage of proportion of aquifer	Imperceptible	Ensure that all areas where liquids (including fuel) are stored, or cleaning is carried out, are in designated impermeable areas that are isolated from the surrounding area and within a secondary containment system.	Imperceptible

		The location of any fuel storage facilities shall be considered in the design of the Construction Compound.	
Loss or damage of proportion of Geological Heritage Area	Imperceptible	None	Imperceptible
Change to groundwater regime	Imperceptible	All concrete mixing and batching activities will be located in areas away from watercourses and drains. Prevention of leaks and spills of hydrocarbons and other chemicals.	Imperceptible

Archaeology, Cultural Heritage & Architectural Heritage

8.257. Section 15 & 16 of the EIAR submitted examines the potential for impacts to arise in relation to Archaeology, Cultural Heritage and Architectural Heritage.

Baseline Conditions - Archaeology & Cultural Heritage

8.258. In terms of baseline conditions with regard to monuments, archaeology and cultural heritage I refer the board to Section 15.3 of the EIAR in which the historical baseline conditions are outlined. It is clear from the information submitted that the area surrounding the proposed route has been a hive of activity for centuries and is rich in archaeology and cultural heritage.

8.259. For the purpose of assessment, the scheme has been divided into four distinct sections:

- Section 1: Tallaght Road to Rathfarnham Road;

- Section 2: Nutgrove Avenue to Terenure Road North – Grange Road, Rathfarnham Road;
- Section 3: Terenure Road North to Charleville Road – Terenure Road East, Rathgar Road; and
- Section 4: Charleville Road to Dame Street.

8.260. I note that a summary of the architectural heritage assets in the receiving environment of the Proposed Scheme have been grouped into the following categories, as set out in Chapter 15 – Archaeological & Cultural Heritage of the submitted EIAR:

- Section 16.3.1.1 World Heritage Sites;
- Section 16.3.1.2 Archaeological Heritage Sites of Archaeological Significance;
- Section 16.3.1.3 Protected Structures;
- Section 16.3.1.4 Architectural Conservation Areas;
- Section 16.3.1.5 Conservation Areas;
- Section 16.3.1.6: NIAH Structures;
- Section 16.3.1.7 Designed Landscapes;
- Section 16.3.1.8 Industrial Heritage Sites;
- Section 16.3.1.9 Other Structures of Architectural Heritage Interest; and
- Section 16.3.1.10 Street Furniture.

Section 1: Tallaght Road to Rathfarnham Road;

8.261. There are no national monuments or sites under Preservation Order within or in the vicinity of section 1 of the Proposed Scheme.

8.262. There is one recorded archaeological site in this section. A section of the City Watercourse coincides with the Proposed Scheme where it travels east and west of the Wellington Lane Roundabout (RMP DU022-003). A total of eight RMP / SMR sites are located within 50m of this section of the Proposed Scheme (see Table 15.4: RMP / SMR Sites within the Proposed Scheme).

8.263. There are 2 Dublin and Blessington Steam Tramway Industrial Heritage sites. There are three cultural heritage sites along this section of the Proposed Scheme.

Templeogue Church and graveyard complex (RMP DU022-009001-007) is set back c.30m from the scheme and will not be affected by the Proposed Scheme. A modern memorial statue of the Virgin Mary stands at the junction of the R137 Templeogue Road with the R112 Springfield Avenue. A stone depot related to the construction and maintenance of the then New Road from Terenure to Templeogue is within the Proposed Scheme on the R137 Templeogue Road. The former street pattern of Terenure, or Roundtown as it was known, is preserved in the layout of buildings surrounding the village centre which can be seen from the air. The rustic arch (NIAH 11216047) (Sheet 15 of 19, Figure 15.1 in Volume 3 of this EIAR), previously obscured by vegetation and now cleared and conserved as part of the works associated with this Proposed Scheme, within the grounds of Templeogue House is the last upstanding remnants of a folly or a structure and was possibly formerly associated with the City Watercourse.

8.264. Other sites along this section of the Proposed Scheme include houses and gate lodges associated with the estates which once existed in this area, comprising the gate lodge to Cypress Grove House, a series of buildings or dwellings on the R137 Templeogue Road and the gate lodges to Temple Ville and Rose Hall, the gate lodge to Bushy Park. There is also the potential for the tracks of the Dublin and Blessington Steam Tramway to survive beneath the surface

Section 2: Nutgrove Avenue to Terenure Road North – Grange Road, Rathfarnham Road.

8.265. Rathfarnham Castle a national monument in State ownership, is located c. 20m east of the Proposed Scheme. It is situated within Rathfarnham Castle Park, separated from the wide modern roadway by a boundary of railings / rendered wall and mature trees. The preservation order map for the castle pertains to the immediate setting of the structure and extends around it. The structure is visible from the roadside through the railings that line this part of the boundary. The castle was built in the late 16th century by the Loftus family and underwent significant remodelling in the 18th century, with an extension and refurbishment during the 20th century.

8.266. The existing boundary wall at Rathfarnham Castle is approximately 380m in length and will be demolished. A new boundary wall will be constructed over the same length along the Proposed Scheme boundary line. The new boundary wall will be circa 2.5m to 2.8m high with round capping rough cast render and will be reinstated

like for like as discussed in Chapter 16 (Architectural Heritage). A short 20m section of low wall and railing will be constructed along the new set-back entrance point to the castle grounds. As part of the process of forming the new boundary, a number of trees directly impacted by the works will be removed. All works, both permanent and temporary within the boundary of the castle, will be archaeologically investigated and monitored.

8.267. There are five recorded archaeological monuments within this section of the Proposed Scheme, and a further five located within 50m (one of which is the national monument discussed above, Rathfarnham Castle (RMP DU022- 014). The sites within this section of the Proposed Scheme comprise of a mill site. The mill, on Butterfield Avenue, has been reclassified as a redundant record but there was a flour mill at that location until the end of the 19th century. Tables 15.9 and 15.10 of the EIAR set out RMP / SMR Sites within section 2 of the proposed scheme and sites within 50m of the proposed scheme, respectively.

8.268. There are two recorded industrial heritage Tramway sites within this section of the Proposed Scheme. It is possible that the tracks may survive beneath some of the road surfaces. I highlight that 6 No. Industrial Heritage Sites located within 50m of the Proposed Scheme are set out in Table 15.12 of the EIAR.

Section 3: Terenure Road North to Charleville Road – Terenure Road East, Rathgar Road.

8.269. There are no national monuments or sites under Preservation Order within or in the vicinity of this section of the Proposed Scheme.

8.270. There are two recorded archaeological monuments within 50m of this section of the Proposed Scheme. They are Rathgar Castle (RMP DU022-086002) and an associated gateway (RMP DU022-086001)

8.271. Summaries of archaeological investigations on or adjacent to the Proposed Scheme are outlined in Appendix A15.1 in Volume 4 of this EIAR.

8.272. There is one recorded industrial heritage site within this section of the Proposed Scheme (Tramway) and one site within 50m of it (Tramway Depot).

Section 4: Charleville Road to Dame Street.

- 8.273. There are two national monuments or sites under Preservation Order within or in the vicinity of this section of the Proposed Scheme. Two gate / Town Defences sites associated with the national monument within the Proposed Scheme, on Wexford Street and on Redmond's Hill (junction of Aungier Street / Digge's Street Upper).
- 8.274. The EIAR sets out that there are 35 recorded archaeological monuments within 50m of the Proposed Scheme. All but two of these sites, an inn and a building (RMP DU018-051; SMR DU018-120), are located inside the ZAP (Zone of Archaeological Potential) for the Historic City of Dublin. The Proposed Scheme will enter the ZAP for Dublin on Camden Street Lower, just south of the Camden Row / Montague Street junction.
- 8.275. It is submitted that a total of five recorded sites are located within this section of the Proposed Scheme, including the Historic City, a building, a cross, the Dubh Linn ecclesiastical enclosure, and a 17th / 18th century house (site of) see Figure 15.1 in Volume 3 of this EIAR). However, one of these sites, the building (SMR DU018-120; Sheet 12 of 19, Figure 15.1 in Volume 3 of this EIAR), is recorded at the incorrect location and is actually outside of the Proposed Scheme at the Coombe. Apart from the Historic City, there are no upstanding remains associated with these sites surviving within the Proposed Scheme. The presumed limits of the ecclesiastical enclosure are preserved in the curving street pattern defined by Peter Row, Stephen Street Upper and Stephen Street Lower.
- 8.276. Buildings dating from the 16th to 19th centuries which are detailed in Table 15.19 of the EIAR as being located within 50m of this section of the Proposed Scheme may contain cellars, and it is possible that these features may extend under the footpaths into the Proposed Scheme. One archaeological monument is located adjacent to the Proposed Scheme outside of the Historic Dublin ZAP, with twenty-nine within the ZAP. The site located outside the ZAP is the Bleeding Horse Inn (RMP DU018-051). The existing Bleeding Horse occupies the site of an older inn which was described as early as 1710. Inside of the ZAP for Dublin, eleven of the recorded sites relate to 17th / 18th century houses, although one is a duplicate record. There are also three 16th / 17th century houses, two houses are of undetermined date, and one is 18th / 19th century in date, the majority of these dwellings are located on Aungier Street which opened in 1661 (RMP DU018-020184; DU018-020340; SMR DU018-438; DU018-437; DU018-386; DU018-436; DU018-435; DU018-434; DU018-385; DU018-

384; DU018-433; DU018-432; DU018-020052; DU018-020368, DU018-020647 and DU018-020248 Sheets 12 and 13 of 19, Figure 15.1 in Volume 3 of this EIAR). Some of these buildings are important survivals of the 17th century street laid out by Francis Aungier. Other notable sites are the habitation site and burial ground which were identified through archaeological investigations on South Great George's Street. A Viking habitation and associated burials were identified on what would have been the southern flank of the 'Black Pool'. Dame Street was one of the earliest thoroughfares of Viking Dublin, and South Great George's Street would have provided access from it to the 'Black Pool', with the habitation and burials evidently occurring adjacent to this street. However, the nature and width of this street at that time is unknown, and it is possible that if it were narrower than it appears today, then features associated with these sites may extend as far as the Proposed Scheme. Two churches and a building are also recorded on South Great George's Street (RMP DU018-020076; DU018- 020137; SMR DU018-020825; see Figure 15.1 in Volume 3 of this EIAR). One of the churches is the medieval parish church of St. George, while the building was the site of the medieval Exchequer. While none of these features are upstanding, they were located in the plots immediately adjacent to the Proposed Scheme, and since the width of the street in the medieval period is unknown, it is possible that features associated with these sites may extend into the Proposed Scheme.

8.277. Finally, I note that there are four sites in the vicinity where associated features may extend into the Proposed Scheme. The medieval parish church of St. Peter's its associated graveyard (RMP DU018-020089) being one. I note for completeness that Table 15.17 – 15.20 of the EIAR sets out 'the RMP / SMR Sites within this section of the proposed scheme', 'sites within 50m from the proposed scheme, outside of the CS ZAP', sites within 50m of the proposed scheme within the Dublin City ZAP' and 'sites in the vicinity of the proposed scheme, within the DCC ZAP, where associated features may extend into the proposed scheme for Charleville Road to Dame Street', Section 4.

8.278. There are four recorded industrial heritage monuments within this section of the Proposed Scheme (two Tramways, the Grand Canal at Portobello Harbour and Latouche Bridge) and ten located within 50m to it, see table 15.22 of the EIAR.

8.279. There are 11 cultural heritage sites along this section of the Proposed Scheme. The majority of these are the sites comprise of coal hole covers which were noted between Richmond Street South and South Great Georges Street (CBC1012CH005; CBC1012CH006; CBC1012CH007; CBC1012CH008; CBC1012CH009; CBC1012CH010; CBC1012CH013; CBC1012CH014). Other features comprise of decorative electrical cabinets which bear the Dublin crest on Wexford Street and Aungier Street (CBC1012CH011; CBC1012CH012; Sheets 12 and 13 of 19, Figure 15.1 in Volume 3 of this EIAR) and a memorial of the 1916 Proclamation on South Great George's Street (CBC1012CH015; Sheet 13 of 19, Figure 15.1 in Volume 3 of this EIAR).

8.280. It is noted in the EIAR that only a few historic cast iron lamp posts were recorded, with a series of Hammond Lane models noted on Harcourt Road and Richmond Street South, and at least one with a fluted base in Rathmines. Miscellaneous items of street furniture comprise of pillar post boxes and ornate electrical cabinets on Camden Street and Aungier Street bearing the Dublin crest (CBC1012CH011; CBC1012CH012; Sheets 12 and 13 of 19, Figure 15.1 in Volume 3 of this EIAR).

8.281. There are eight isolated sections of offline works, associated with quiet streets and road layout changes, as referred to above, that are not directly located along the Proposed Scheme. No offline works are occurring in proximity to a recorded monument and there are no known features of a cultural heritage interest at these locations

8.282. It is notable that the only construction compound recommended for archaeological monitoring in the EIAR is TR3. As this proposed compound area falls to the northwest of the ZAP of a watermill (RMP DU022-070) and to the west of a ZAP for a church, graveyard and graveslab (RMP DU022- 013001/002/003). As part of the compound site, lies within a greenfield area in proximity to archaeological sites, therefore archaeological monitoring is recommended.

Protected Structures and their settings

8.283. The principal direct impact of works will be to a number of boundaries to Protected Structures during construction phases. Three locations were identified where the Proposed Scheme will directly impact on the boundaries of Protected Structures during the Construction Phase. These include the boundaries to 74, 76 and 78 Terenure Road East (DCC RPS 8118, 8119, 8121), 59 to 69 Terenure Road East

(DCC RPS 8106, 8107, 8109, 8111, 8113, 8116) and 50 to 62 Terenure Road East (DCC RPS 8097, 8099, 8101, 8103, 8105, 8108). The boundaries are to be repositioned to facilitate the proposed bus and cycle lanes. The permanent land acquisition at the front boundaries of some protected structures will require the deconstruction and relocation of boundary walls and entrance gates. Additionally, there will be a permanent impact on mature gardens and trees.

- 8.284. The proposed mitigation is the recording of the existing boundaries in position prior to the works, labelling the affected masonry, brickwork, railings, gates, gate posts, capping stones prior to their careful removal to safe storage, and their reinstatement on new lines, which 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 the labelling, taking-down and reinstatement of the affected gates, railings, piers, bricks and masonry. 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.
- 8.285. The Conservation Section of DCC notes that where works may require the removal of existing roadside boundary walls, railings, entrances gates and hedgerows, together with areas of existing garden plantings garden trees, paving and garden features, new boundary walls, railings, entrances gates and hedgerows to match existing shall be reinstated at setback location, pending agreement on more detailed design with the Planning Authority's Conservation Section and having regard to the provisions of the Architectural Heritage Protection Guidelines for Planning authorities (2011) and the relevant DHLGH Advice Series publication(s).
- 8.286. The mid-18th century Freestanding Arch on Templeogue Road (SDCC RPS 244) is part of the wider planned Baroque landscape of Templeogue House Demesne (NIAH 2313). It has been until recently very overgrown and is sealed off. The proposed scheme involves the routing of a footpath to the rear or north of the folly and repairing the arch. As part of these works the folly is to be repaired, conserved and opened to the public.
- 8.287. There is a potential for indirect physical impact to high sensitivity nationally important protected structures. Indirect physical Construction Phase impacts are anticipated in

six locations, where Protected Structures of National Importance and High Sensitivity share a boundary with the Proposed Scheme. These include Rathfarnham Castle (RMP DU022-014), 21 Aungier Street (RMP DU018-020184), 20 Aungier Street (RMP DU018-386), 10 and 10a Aungier Street (RMP DU018-385), 9 and 9a Aungier Street (RMP DU018-384) and the South City Markets (DCC RPS 3214 to 3223). There is potential for damage during construction. Mitigation will provide for the recording, protection and monitoring of the Protected Structures 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 the EIAR.

8.288. Proposed land take will impact the setting and boundary of some protected structures. The proposed paving works at Cranford Lodge on Rathgar Road (DCC RPS 7093) and the land take at 48 Harrington Street (DCC RPS 3619) may also indirectly impact the gates and railings. No works are proposed to these features which is of medium sensitivity but there is potential for damage of these features during construction. The pre-mitigation Construction Phase impact is Indirect, Negative, Moderate and Temporary. The proposed mitigation is the recording, protection and monitoring of the Protected Structures 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 risk from medium to Low. The predicted residual Construction Phase Impact is Indirect, Negative, Slight, Temporary.

8.289. There are no direct impacts on any of the ACA's within the Proposed Scheme. It is however outlined that there is the potential for damage during construction to the South City Markets (DCC RPS 3214 to 3223). The proposed paving, landscaping and urban realm works on South Great George's Street will be within the South City Retail Quarter Architectural Conservation Area which is of medium sensitivity. Also, the proposed paving, landscaping and urban realm works on the Grange Road and

Rathfarnham Road will adjoin or will be within the Rathfarnham Architectural Conservation Area which is of medium sensitivity. The installation of the proposed paving carries a risk of accidental damage to protected and other heritage buildings or their boundary treatments during the construction stage. The proposed mitigation is the protection and monitoring of sensitive architectural heritage features within the affected areas of the ACA 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.

8.290. There are no direct impacts on any of the Conservation Areas within the Proposed Scheme. These include Grand Canal CA, Richmond Street to Aungier St CA, and Dame St CA. The areas are described within Chapter 16 Architectural Heritage. The installation of the proposed paving carries a risk of accidental damage to boundary treatments of protected and other heritage buildings during the Construction Phase. Again, this shall be managed by mitigation and monitoring by specialists.

8.291. There are no direct impacts on any of the NIAH structures within the Proposed Scheme. 51 NIAH Structures or groups of NIAH structures of Regional Importance and Medium Sensitivity will front directly onto the Proposed Scheme. These are indicated in Table: 16.9. None of these features will be directly impacted by the Proposed Scheme, but there is the potential for damage during construction.

8.292. Indirect physical Construction Phase impacts are anticipated in six locations, where Protected Structures of National Importance and High Sensitivity share a boundary with the Proposed Scheme. These include Rathfarnham Castle (RMP DU022-014), 21 Aungier Street (RMP DU018-020184), 20 Aungier Street (RMP DU018-386), 10 and 10a Aungier Street (RMP DU018-385), 9 and 9a Aungier Street (RMP DU018-384) and the South City Markets (DCC RPS 3214 to 3223).

8.293. The proposed land take to Grange Road directly impacts the boundary wall to the Rathfarnham Castle Demesne. Rathfarnham Castle is a 16th century Castle remodelled in the 18th century and is a National Monument (RMP DU022-014) and therefore of High sensitivity. It is also located directly opposite the Rathfarnham Architectural Conservation Area. The Demesne (NIAH 2351) has been much reduced in size but is a public park around the Castle, preserving its setting. Some trees will be removed as a result of the land take and will be a temporary negative visual impact during construction.

- 8.294. The Proposed Scheme requires land take along the east side of the Rathfarnham Road which will directly impact the surviving demesne or boundary walls to Wasdale House and the Synagogue, formerly the boundary wall to Leoville House. Land take is required along the north side of the Templeogue Road which will directly impact the surviving demesne or boundary walls and the walls and railings to the bell mouth to gateway to Templeogue Lodge, 321 Templeogue Road. Proposed land take will occur in the demesne of Bushy Park House. Indirect Construction Phase impacts are anticipated at the gate piers, gates and jostle stones to Templeogue Lodge, 321 Templeogue Road.
- 8.295. The EIAR highlights that indirect Construction Phase impacts are anticipated where there is potential for damage to the designed landscapes or their surviving features or where an adverse visual impact is anticipated during construction. Three designed landscapes of Low sensitivity were identified in the study area where there is potential for damage during the construction phase, these include demesne walls or lodges associated with Westbourne House, 1 to 2 Westbourne Road Greenmount House, 85 Terenure Road East and Templeogue Lodge, 321 Templeogue Road.
- 8.296. With regard to 'other structures' the proposed land take on the west side of the Rathfarnham Road will directly impact the boundary treatments to 51 to 71 Rathfarnham Road which are of low sensitivity. These largely consist of cement rendered walls and piers with concrete cappings. Although some interventions have occurred in the past such as the widening of gateways, the boundary treatments are largely intact and consistent and contribute to the character of the houses and the streetscape in general.
- 8.297. The proposed land take on Terenure Road East will directly impact the boundary treatments to 74a and 80 Terenure Road East both houses are of medium sensitivity. The boundary treatments to 74 and 74a have been replaced with a 20th century yellow brick boundary and reproduction railings. The boundary wall to number 80 has been radically altered in the 20th century.
- 8.298. The proposed land take on Terenure Road East will directly impact the boundary treatments to 60 Terenure Road East. Number 60 Beaumont House is a 20th century apartment block which replaced a house of the same name. The boundary treatment survives and is of medium sensitivity. It consists of a randomly coursed granite rubble wall with a cut granite plinth and dressed granite capping. An iron

milestone plaque is located in the wall. Boundary treatments are largely intact and consistent and contribute to the character of the houses and the streetscape in general. It is acknowledged that the removal of these boundaries would have a negative impact.

8.299. 20a Aungier Street is of national Importance and High Sensitivity and will front directly onto the Proposed Scheme. Indirect Construction Phase impacts are anticipated where there is potential for damage to sensitive fabric, and an adverse visual impact on the setting of a structure during construction.

8.300. Proposed kerb realignments and paving works on the Rathfarnham and Rathgar Roads will be in close proximity to the paired gateways of Auburn Villa Rathgar Road and an Art Deco former Cinema at Terenure Enterprise Centre. No works are proposed to these features which is of medium sensitivity but there is potential for damage of these features during construction.

8.301. Bus shelters are to be erected at four protected structures. Shelters are proposed at 12 Terenure Road East (DCC RPS 8063); 78 Rathgar Road (DCC RPS 7072); 153 Rathgar Road (DCC RPS 7120); and 46 Rathgar Road (DCC RPS 7046).

8.302. The EIAR highlights that Bus shelters are proposed at non-protected structures of regional and local importance including 190 Rathfarnham Road (CBC1012BTH037) which is of Regional importance; 59 Rathfarnham Road (CBC1012BTH040) which is of Local importance; and Rathfarnham Road (CBC1012BTH058) which of Local importance; 34 Grosvenor Place (CBC1012BTH174) which is of Regional importance; and 32 Camden Street Lower (CBC1012BTH283) which is of Regional importance.

Street Furniture, Paving and Surface Treatments, Impacts upon coal holes

8.303. The cast iron pillar style post box at 50 Terenure Road East will be directly impacted by a proposed land take necessitating its temporary removal. It is envisaged that the post boxes will be reinstated. There is the potential for loss or damage to the post boxes during removal, transportation, storage, and reinstatement.

8.304. The remaining 13 cast iron post boxes are of Regional Importance and Medium Sensitivity as outlined in Table: 16.12. They will be retained in position and will not be directly impacted by the Proposed Scheme during the Construction Phase. Indirect impacts are anticipated during the Construction Phase due to the potential for disruption of the use of the post boxes.

- 8.305. Lamp posts of Regional Importance and Medium Sensitivity will be directly impacted during the Construction Phase, where it is proposed that they will be moved to accommodate urban realm improvements, road realignments and cycle lanes. This includes the Lamp post on traffic island at junction of Rathmines Road Upper, Rathmines Road Lower and Rathgar Road. There is the potential for loss or damage to the lamp posts during their removal, transportation, storage, and reinstatement. I note that other groups of lamp posts of local importance and low sensitivity will be moved to accommodate urban realm improvements, road alignment and cycle lanes.
- 8.306. Land take will directly impact on a vent pipe on Terenure Road East necessitating its removal and relocation. The Vent Pipe is of Regional Importance and Medium Sensitivity. It will be temporarily removed to ensure its protection, before being reinstated within the vicinity of the existing.
- 8.307. A Mile Stone at 69 Terenure Road East will be directly impacted by the proposed land take. The milestone is of regional importance and medium sensitivity. There is potential for damage of the sensitive fabric during its removal, transport, storage, and reassembly.
- 8.308. The EIAR notes that proposed kerb realignments at 48 Harrington Street & 12 Camden Street Upper, 61 - 73 Camden Street Lower, 83-87 Camden Street Lower and DCC Green area on the east side of Redmond's Hill will directly impact granite kerbs on the west sides of Camden Street Upper, and Camden Street Lower and on the east side of Redmond's Hill. The kerbs are to be repositioned. The kerbs are of Regional Importance and Medium Sensitivity.
- 8.309. Coal holes at 44 & 45 Richmond Street will be directly impacted by the proposed land take necessitating their removal and relocation. The removal of the granite surrounds and covers will carry the potential risk of loss or damage. The proposal may also removed the connection with the cellars beneath.
- 8.310. The changes in the alignment of the footpaths and the proposed paving treatments will be in close proximity to 109 surface treatments identified In Table 2.3 in Appendix 4 of this EIAR. They include granite kerbs, cellar lights and grilles, granite paving, cobbles, coal holes and areas of paving of Regional Importance and Medium Sensitivity. There is potential for damage of these features during construction.

8.311. Cantilever signal poles are proposed at various locations including mid-20th century houses at 144 to 152 Rathfarnham Road (CBC1012BTH038) on the junction of the Rathfarnham Road and Dodder Park Road; The Church of the Three Patrons on Rathgar Road (CBC1012BTH173); and at 49 Camden Street Lower (CBC1012BTH258).

Mitigation

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

8.313. Licence applications are made by the licence-eligible archaeologist to the National Monuments Service at the DHLGH. In addition to a detailed method statement, the applications must include a letter from the NTA that confirms the availability of adequate funding. There is a prescribed format for the letter that must be followed.

8.314. Other consents may include a Detection Device licence to use a metal-detector or to carry out a non-invasive geophysical survey.

8.315. A construction schedule will be made available to the archaeologist, with information on where and when the various elements and ground disturbance will take place.

8.316. As part of the licensing requirements, it is essential for the client to provide sufficient notice to the archaeologist(s) in advance of the construction works commencing. This will allow for prompt arrival on site to undertake additional surveys and to monitor ground disturbances. As often happens, there may down time where no excavation work is taking place during the construction phase. In this case, it will be necessary to inform the archaeologist/s as to when ground-breaking works will recommence.

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

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

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

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

8.321. During the construction all machine traffic must be restricted as to avoid any newly revealed archaeological or cultural heritage sites and their environs. Materials management will be in operation to ensure no damage to a site of archaeological interest

8.322. Archaeological monitoring (as defined in section 15.5.1.1) under licence will take place, where any preparatory ground-breaking or ground reduction works are required at the following locations:

- Along the course of the Historic Dublin City Watercourse (RMP DU022-003) at Spawell Roundabout and Templeogue Road
- Within the ZAP associated with the church and graveyard (RMP DU022-009) at the upstanding religious remains (Church, graveyard and graveslabs) at Templeogue Road
- At the site of a gate lodge at Templeogue Bridge
- At the site of gate lodges for Temple Ville and Rose Hall
- At the site of a gate lodge (Bushy Park) and
- Along the course of the former tramline (DCIHR 22-02-019) on Templeogue Road

8.323. With regard to works in the environs of Rathfarnham Castle, archaeological consent is required from the Minister of DHLGH.

- 8.324. Coal Hole covers will be recorded by an archaeologist in relation to the associated property and coal cellar. The surrounding granite setting will be recorded, noting the presence and characteristics of any channel which has been carved into the setting. The coal hole covers and associated granite settings will be removed under archaeological supervision and in accordance with a method statement agreed with the NTA and the statutory authorities. They will be reinstated as close as possible to their original location to accommodate a cycling track.
- 8.324.1. Works to lamp posts, paving and surface treatments will also be overseen by an architectural specialist and will also be carried out by the appointed contractor 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.

Potential Operation Phase Impacts

- 8.325. A summary of Predicted Construction Phase Impacts Following the Implementation of Mitigation and Monitoring Measures are set out in Table 16.17 of the EIAR. In the main the predicated residual impact is considered direct, positive, significant, long – term / indirect, negative, slight, temporary or Indirect, negative, not significant, temporary.
- 8.326. The characteristics of the Proposed Scheme of particular relevance to the architectural heritage assessment during the Operational Phase, are the alterations to bus stop locations, particularly where these include the erection of new shelters or cantilever signal poles or the removal of existing shelters, and alterations to the public realm including the provision of new trees, and the removal of trees which may impact on the settings of sensitive features and sites. The proposed improvements to the public realm, and the resulting reduction in vehicular traffic will generally have a positive effect on the historic environment
- 8.327. Whilst no negative impacts of significance are expected as a result of the development, I note in the case of the relocation of front boundaries, the applicant proposes to record the existing boundaries in position prior to the commencement of construction works. The affected railings, gates, gate posts, capping stones and historic masonry are to be labelled prior to their careful removal to safe storage, and their reinstatement on new lines, reinstating 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.

8.328. A similar approach is to be undertaken in relation to other Structures of Architectural Heritage Interest as listed above.

8.329. Such measures are commonplace in relation to works within the curtilage of a protected structure or historical building or street furniture. The specific features will not be damaged or removed but merely relocated. It is reasonable therefore to consider the magnitude of effects not to be significant in this instance.

8.330. I draw the Board's attention to table 15 hereunder in which all of the potential impacts, and the magnitude of same are summarised for ease of reference.

8.331. Significant impacts do not arise in relation to the operation of the development.

Conclusion

8.332. Once the mitigation measures have been implemented, there will be no Significant residual Negative impacts on the architectural heritage as a result of the Construction Phase of the Proposed Scheme, apart from the predicted Negative, Moderate, Temporary impact on coal holes at 44 and 45 Richmond Street. There will be Significant, Positive Long Term impacts associated with the Rathfarnham Castle & Demesne and Free Standing Archway as a result of the Construction phase of the Proposed Scheme.

8.333. I note the Council's concerns in relation to the relocation of street furniture, lighting poles, and acknowledge that such measures are necessary to implement the proposed scheme. In the interest of retaining the integrity of these structures I recommend that an Architectural Heritage Specialist is employed to monitor the removal and replacement of such structures.

8.334. With respect to Bus shelters at or in proximity of protected structures, I refer the Board to section 6.11 of this report above.

8.334.1. Overall general impacts to architectural heritage arise in relation to the alterations to the public realm including the provision of new trees, and the removal of trees which may impact on the settings of sensitive features and sites. The proposed development will improve the overall streetscape along the proposed route and whilst I acknowledge that the removal of trees at specific locations may impact the setting or character of a particular structure, I am satisfied that on balance the overall scheme will be a vast improvement to the character and setting of not only

protected structures referred to above but to buildings which, although not protected, provide a historical reference to the past.

8.335. I have considered all of the written submissions made in relation to Archaeology, Cultural Heritage and Architectural heritage and the relevant contents of the file including the EIAR. I am satisfied that the potential for impacts on Archaeology, Cultural Heritage and Architectural heritage can be avoided, managed and/or mitigated by measures that form part of the proposed scheme, by the proposed mitigation measures and with suitable conditions. I am therefore satisfied that the potential for direct or indirect impacts on Archaeology, Cultural Heritage and Architectural heritage can be ruled out. I am also satisfied that cumulative effects, in the context of existing and permitted development in the surrounding area and other existing and proposed development in the vicinity of the site including the proposed the other bus connects routes are not likely to arise.

Table 15 Archaeology, Cultural Heritage and Architectural heritage – Summary of potential and residual effects.

Potential impacts	Magnitude of Impact	Mitigation	Residual Impact
<p><u>Nutgrove Avenue to Terenure Road North</u></p> <p><u>Works to:</u></p> <p>NIAH 2351, RMP DU022-014, Nat. Mon. No. 628, PO no. 2/1986, SDCC RPS 221, Rathfarnham Castle & Demesne</p> <p>Rathfarnham Architectural Conservation Area</p> <p>The Bushy Park/Dodder Valley Conservation Area</p> <p>51 to 71 Rathfarnham Road</p> <p>Art Deco former Cinema at Terenure Enterprise Centre</p> <p>Former boundary wall to Wasdale House</p>	<p>Direct Negative, Significant, temporary.</p> <p>Indirect, Negative, Moderate, Temporary</p>	<p>Yes.</p> <p>Recording, labelling and reinstating at different location. To be undertaken by an architectural heritage specialist</p>	<p>Direct, Positive, Very Significant, Long Term Negative, Significant and Permanent</p> <p>Direct / Indirect, Negative, Slight, Temporary</p>

<p>Boundary wall to the Synagogue, formerly Leoville House</p>			
<p><u>Terenure Road North to Charleville Road</u></p> <p>Works including:</p> <p>74 to 78 Terenure Road East</p> <p>59 to 71 Terenure Road East</p> <p>Mile Stone 69 Terenure Road East</p> <p>50 to 62 Terenure Road East,</p> <p>Boundary wall 60 Terenure Road East</p> <p>Freestanding cast iron pillar style post box, 50 Terenure Road East</p> <p>Milestone, 60 Terenure Road East, north side</p> <p>Cranford Lodge on Rathgar Road</p> <p>Auburn Villa Rathgar Road</p>	<p>Direct, Negative, Significant, Temporary</p> <p>Negative, Moderate, Temporary</p>	<p>As Above</p>	<p>Direct, Negative, Slight, Temporary</p> <p>Direct Negative, Not significant, Temporary</p> <p>Indirect, Negative, Slight, Temporary</p>
<p><u>Charleville Road to Dame Street.</u></p> <p>Works including:</p> <p>Grand Canal Conservation Area</p> <p>Richmond Street to Aungier Street Conservation Area</p> <p>8 Harrington Street</p> <p>Kerbs at Camden Street Upper, Camden Street Lower and on the east side of Redmond's Hill</p> <p>Coal holes at 44 & 45 Richmond Street</p>	<p>Indirect, Negative, Moderate, Temporary</p>	<p>As above</p>	<p>Indirect, Negative, Slight, Temporary</p> <p>Direct, Negative, Not Significant and Temporary</p>

<p>Cellar hatch 44 & 45 Richmond Street</p> <p>20a Aungier Street</p> <p>South City Retail Quarter Architectural Conservation Area</p> <p>Dame Street Conservation Area</p>			
<p><u>Tallaght Road to Rathfarnham Road</u></p> <p>Works including:</p> <p>Freestanding Arch Templeogue Road</p> <p>Templeogue Lodge, 321 Templeogue Road</p> <p>Templeogue Lodge, 321 Templeogue Road</p> <p>Bushy Park House Demesne</p>	<p>Indirect, Negative, Slight and Temporary</p> <p>Indirect, Negative, Moderate, Temporary</p>	<p>As above</p>	<p>Direct, Positive, Very Significant Long Term</p> <p>Direct Negative, Slight, Temporary</p> <p>Indirect, Negative, Not significant and Temporary</p>
<p>Protected Structures (all Sections) Refer to Appendix A16.2 in Volume 4 of this EIAR for feature identification</p> <p>Protected Structures (6 locations)</p>	<p>Indirect, Negative, Significant, Temporary</p>	<p>As above</p>	<p>Indirect, Negative, Slight, Temporary</p>
<p>NIAH Structures (all Sections) Refer to Table: 16.9 and Appendix A16.2 in Volume 4 of this EIAR for feature identification</p> <p>NIAH Structures (51 locations)</p>	<p>Indirect, Negative, Moderate, Temporary</p>	<p>As above</p>	<p>Indirect, Negative, Slight, Temporary</p>
<p>Designed Landscapes (all Sections) Refer to Table: 16.9</p>	<p>Indirect, Negative,</p>	<p>As above</p>	<p>Indirect, Negative, Slight, Temporary</p>

and Appendix A16.2 for feature identification	Moderate, Temporary		Indirect, Negative, Not significant, Temporary
Post boxes (all Sections) Refer to Table: 16.12 and Appendix A16.2 in Volume 4 of this EIAR for feature identification	Indirect, Negative, Moderate, Temporary	As above	Indirect, Negative, Not significant, Temporary
Lamp Posts (all Sections) Refer to Table: 16.13 and Appendix A16.2 in Volume 4 of this EIAR for feature identification	Indirect, Negative, Moderate, Temporary	As above	Direct, Negative, Slight, Temporary Direct, Negative, Not significant, Temporary
Statuary and street furniture (all Sections) Refer to Table: 16.14 and Appendix A16.2 in Volume 4 of this EIAR for feature identification	Indirect, Negative, Moderate, Temporary Indirect, Negative, Slight and Temporary		Indirect, Negative, Slight, Temporary Indirect, Negative, Not significant, Temporary
Paving and Surface Treatments (all Sections) Refer to Appendix A16.2 in Volume 4 of this EIAR for feature identification	Indirect, Negative, Moderate, Temporary	As above	Indirect, Negative, Slight, Temporary

Landscape, Townscape & Visual

8.336. Section 17 of the EIAR submitted examines the potential for impacts to arise in relation to landscape, townscape and visual impact. It is of note that visual impacts in relation to the proposed scheme have been examined in the context of the project design and the public realm within the assessment section of this report. See section 6.31 of this report. Such matters will not be repeated hereunder and this section of the EIAR should be read in conjunction with the aforementioned. It is important to mention at the outset that likely significant adverse effects will arise but are short term and temporary in nature, with the exception of the permanent acquisition of property which

have mature gardens and plantings with established boundaries. All other impacts are considered to be of moderate magnitude.

Baseline Conditions

8.337. The establishment of baseline conditions was carried out based on initial desk studies, supported by full route walkovers and augmented by further specific site reviews. The Proposed Scheme includes a wide variety of suburban and inner-city suburban residential landscapes, townscape and visual features from streetscape boundary and public realm features, to residential and mixed use zonings, historic landscapes and boundaries, to biodiversity and heritage assets, see section 5.23 and 5.24 of this report above for zoning designations, for both Dublin City Council and South Dublin County Council pertaining to the proposed scheme.

8.338. For the purpose of the visual & townscape assessment the proposed route has been divided into four sections as follows:

- Section 1: Tallaght Road to Rathfarnham Road;
- Section 2: Nutgrove Avenue to Terenure Road North – Grange Road, Rathfarnham Road;
- Section 3: Terenure Road North to Charleville Road – Terenure Road East, Rathgar Road; and
- Section 4: Charleville Road to Dame Street

8.339. Baseline conditions for each of the above sections is outlined in table 17.6 of the EIAR.

In brief I note that with regard to the first section above, the area is located within the peri urban suburbs / outer city and comprises of dual carriageway. It is relatively open landscape corridor to the west, becoming gradually more enclosed in the residential suburban edge approaching Templeogue Village to east. Amenity Designations include: open spaces present at Tymon Park, Spawell Centre, and along northern side of road corridor at Spawell Roundabout. Rural landscape exists along River Dodder Valley to south of the road corridor. Bushy Park Regional Park, mature tree-lined landscape area at Rathdown Drive, pedestrian link to ETB Sports Ground. Residential Conservation Areas along sections of Templeogue Road. There are no tree preservation orders or protected views. There are protected structures present along this section of the route and the impact to same has been examined within the relevant

section of this report above and will not be repeated hereunder save to state that such structures are present within this section of the scheme.

8.340. In relation to the second section identified above; Nutgrove Avenue Junction to Terenure Road North, I note that this section of the proposed route currently comprises a suburban road predominantly lined by two-storey terraces, most of redbrick or redbrick and render with established front gardens – with driveways. Some semi-detached properties with single-storey terraces are present. Many properties are elevated above the road. Modern infill with larger apartment development is present at Rathfarnham. There is a mix of property boundaries including some brick walls and piers, rendered walls, railings, stone copings, and combination of the same. Limited / no street tree planting. There are areas of significant open space – linked to Rathfarnham Castle, and the corridors of the Owendoher River and the River Dodder – with stands of early mature and mature trees. Limited tree planting within road corridor. Amenity designations include the ACA at Rathfarnham Village. Conservation Area at River Dodder. Open Space / Amenity areas at Rathfarnham Castle grounds, Owendoher River corridor, Springfield Avenue / Brookvale, Outstanding Character / Amenity of River Dodder. Residential Conservation Areas along sections of Rathfarnham Road. There are no tree preservation orders or protected views. There are protected structures present along this section of the route and the impact to same has been examined within the relevant section of this report above and will not be repeated hereunder save to state that such structures are present within this section of the scheme.

8.341. In relation to the third section - Terenure Road North to Charleville Road. I note that this section of the proposed route currently comprises a suburban road, which is predominantly lined by two-storey / three-storey terraces, most of redbrick or redbrick and render with established front gardens with driveways, and mature trees. There is a mix of property boundaries including some brick walls and piers, rendered walls, railings, stone copings and combination of same. Short sections of historic granite kerbs are present. There is no street tree planting but large trees are present on the boundaries between footpaths and residential properties. There are no amenity designations and there are no tree preservation orders or protected views. There are protected structures present along this section of the route and the impact to same has been examined within the relevant section of this report above and will not be

repeated hereunder save to state that such structures are present within this section of the scheme.

8.342. Finally, the Charleville Road to Dame Street section comprises Suburban and urban road lined by two-storey terraces and urban terraces. There is some limited modern infill with larger recent apartment development. There is a mix of property boundaries including some brick walls and piers, rendered walls, railings, stone copings and combination of same. Short sections of historic granite kerbs. Wide concrete footpaths. No street tree planting. Amenity designations include Architectural Conservation Area along George's Street Great (South City Retail Quarter ACA). Conservation Area at the Grand Canal and along full corridor of Proposed Scheme from the Grand Canal to Dame Street. The Grand Canal corridor is a designated open space. There are no tree preservation orders within this section of the route.

Potential Impacts

8.343. The potential for impacts to arise relate to both the construction and operational phase of the development. The applicant within section 17.4.1.3 of the EIAR has listed the key characteristics of the proposed construction phase which are of particular relevance to the townscape and visual assessment. Such characteristics relate to proposed works at specific locations such as the provision of new junction layouts, lighting, drainage, road markings and surfaces, land take for the widening of surfaces, removal of trees and landscaping and removal of residential boundaries and garden landscaping. The proposed construction compound to be located on existing open space at TR3 Woodview Cottages, the removal of boundary walls to properties and in particular the removal and replacement of Rathfarnham Castle Wall will be the most dominant changes to the landscape and street scape during the construction phase of the development.

8.344. It is also important to note that the applicant has provided photomontages of the scheme which I have had regard to in the assessment of effects to landscape, townscape and the visual aspects of the proposed development. These demonstrate that the overriding visual changes to the proposed route relate to the loss of trees and vegetation and the replacement of same with species at a smaller growth stage.

8.345. In the interest of conciseness, I will examine the potential impacts relevant to each of the four sections of the scheme individually hereunder. However certain construction activities are common to all sections and will have a certain level of impact visually.

The presence of construction machinery, fencing and hoardings and general construction activities associated with the diversion of services and widening and resurfacing of road space will all have a visual impact albeit temporarily. Such activities cannot be mitigated and are not considered to be significant given the temporary nature of the works.

Tallaght Road to Rathfarnham Road

8.346. The baseline townscape is of **low sensitivity** west of Templeogue Village to **high sensitivity** through Templeogue Village to Terenure. The Proposed Scheme involves the reconstruction and resurfacing of the roads, footpaths, and cycle track pavements. New kerbs will also be provided following the realignment of the existing kerb lines. Construction activities will also consist of the installation of additional signage, new road markings, new and amended traffic signal infrastructure, new road lighting, new street furniture (rubbish bins, seats, lighting, benches, planters, bollards, cycle racks, bus stop (including shelters and information displays etc.)), landscape works and localised removal of trees and planting. There will be land take from 15 residential properties on Templeogue Road involving permanent loss of garden area, setting back of boundaries, construction of retaining wall, and removal of trees hedges and other garden planting. There will be substantial works to Spawell roundabout where the existing roundabout junction will be upgraded to a four-arm signalised junction. The central island and splitter islands and associated vegetation of the roundabout will be removed and there will be a rearrangement and general expansion of the outer landscape areas. There will be more minor works to verges and other roadside landscape areas throughout this section with some limited loss of trees to accommodate new or realigned cycle tracks. There will be works to the surrounds of the historic folly of Templeogue Arch for the purposes of permanently enhancing the setting of the structure and providing public access. The construction works will not alter the overall townscape character along this section of the Proposed Scheme but there will be temporary disturbance to the landscape and visual amenity of the streetscape. The magnitude of change in the baseline environment is high. The townscape / streetscape impact of the Construction Phase is assessed to be **Negative, Moderate Temporary / Short-Term, west of Templeogue and Negative, Significant / Very Significant and Temporary / Short-Term through Templeogue to Rathfarnham Road.**

Nutgrove Avenue to Terenure Road North – Grange Road, Rathfarnham Road

8.347. The baseline townscape is of **high** sensitivity and the Proposed Scheme involves the reconstruction and resurfacing of the roads, footpaths, and cycle track pavements. New kerbs will also be provided following the realignment of the existing kerb lines. Construction activities will also consist of the installation of additional signage, new road markings, new and amended traffic signal infrastructure, new road lighting, new street furniture (rubbish bins, seats, lighting, benches, planters, bollards, cycle racks, bus stop (including shelters and information displays etc.)), landscape works and substantial removal of sections of trees and planting. Sections of the existing boundary walls along the eastern side of Grange Road and Rathfarnham Road, adjacent to Rathfarnham Castle Park, will be realigned and reconstructed due to the proposed widening of the carriageway. The low height wall at the junction with Rathfarnham Wood will also be realigned and reconstructed to accommodate the upgrade of the traffic signalised junction. The Construction Phase involves substantial acquisition from residential properties along Rathfarnham Road, and from Rathfarnham Castle grounds with associated removal of a substantial section of mature woodland edge as well as garden hedges and other plantings. This element of works will result in considerable changes along this section of the Proposed Scheme. Construction Compound TR3 will be located along Dodder View Road, across the road from Bushy Park, in the greenfield area between Dodder View Road, Woodview Cottages and Church Lane, and will result in some short-term removal of grassland but no impact on the surrounding mature trees or woodland. The construction works will not alter the overall townscape character along this section of the Proposed Scheme, however, the works will detract from the streetscape character and amenity. The magnitude of change in the baseline environment is very high. The townscape / streetscape impact of the Construction Phase is assessed to be **Negative, Very Significant and Temporary / Short-Term.**

Terenure Road North to Charleville Road – Terenure Road East, Rathgar Road; and

8.348. The baseline townscape is of **very high** sensitivity and the Proposed Scheme involves the reconstruction and resurfacing of the roads, footpaths, and cycle track pavements. New kerbs will also be provided following the realignment of the existing kerb lines. Construction activities will also consist of the installation of additional signage, new road markings, new and amended traffic signal infrastructure, new

road lighting, new street furniture (rubbish bins, seats, lighting, benches, planters, bollards, cycle racks, bus stop (including shelters and information displays etc.)) and landscape works. Although the design of the schemes has sought as far as practicable to limit impacts on private properties and trees, the works will involve acquisition from several residential properties with associated removal of boundaries, trees and other plantings. There will be a substantial impact on the streetscape of Terenure Road East from the loss of several prominent specimen trees. These element of works will result in considerable changes along the Terenure to Rathgar section of the Proposed Scheme, but other sections of the scheme will involve relatively modest changes. The construction works will not alter the overall townscape character along this section of the Proposed Scheme, however, the works will detract from the streetscape character and amenity, particularly between Terenure and Rathgar. The magnitude of change in the baseline environment is high. The potential townscape / streetscape impact of the Construction Phase is assessed to be **Negative, Very Significant and Temporary / Short-Term.**

Charleville Road to Dame Street

8.349. The baseline townscape is of **very high sensitivity** and construction of the Proposed Scheme involves demolition, excavation and construction works of sections of kerbs, carriageways, sections of footpaths, junctions, surfacing and parking areas, drainage features and utilities along but within the road corridor. No carriageway widening works or new boundary treatment is expected within this section, and there would only be very limited removal of trees (three young street trees). The construction works will not alter the overall townscape character along this section of the Proposed Scheme, but there will be a short-term reduction in streetscape amenity. The magnitude of change in the baseline environment is medium. The potential townscape / streetscape impact of the Construction Phase is assessed to be **Negative, Moderate and Temporary / Short-Term**

Architectural Conservations.

8.350. There will be substantial works at the edge Rathfarnham ACA involving road widening and impacts on boundaries and trees at Rathfarnham Castle. The impact has been assessed in the preceding section of this report and through out in the visual impact / townscape section of 6.31 above. While the works will disrupt the amenity of the ACA in the short-term, it will have limited impacts on the key

characteristics. The sensitivity is very high, and the magnitude of change is medium. The potential townscape / streetscape impact of the Construction Phase on Rathfarnham ACA is assessed to be **Negative, Significant and Temporary / Short-Term**.

8.351. The works will result in limited changes at South Great George's Street (South City Retail Quarter ACA). **The sensitivity is very high, and the magnitude of change is low.**

8.352. The potential townscape / streetscape impact of the Construction Phase on ACA at George's Street Great South is assessed to be **Negative, Moderate and Temporary / Short-Term**.

Conservation Areas

8.353. Conservation Areas are located at the River Dodder and Grand Canal and along the Proposed Scheme from the Grand Canal north to Dame Street. The Construction Phase will involve works of minimal intensity and extent, limited to changes to road corridor layout / surfacing on bridges within the River Dodder and Grand Canal conservation areas. There will be a short-term disruption to the amenity of these areas, but the key characteristics and character of the areas will not be impacted. The sensitivity is very high and the magnitude of change in the baseline environment is low / medium. The potential townscape / streetscape and visual impact of the Construction Phase on the River Dodder and Grand Canal conservation areas is assessed to be **Negative, Moderate and Temporary / Short-Term**.

8.354. The operation of the Proposed Scheme will result in changes over a large extent of the conservation areas between the Grand Canal and Dame Street. The works will be largely limited to changes to street surfacing with minimal impact on key characteristics. The sensitivity is very high and the magnitude of change in the baseline environment is low / medium. The potential townscape / streetscape and visual impact of the Construction Phase on conservation areas between the Grand Canal and Dame Street will be **Negative, Moderate and Temporary / Short-Term**.

Amenity Designations

8.355. A number of amenities are located along the Proposed Scheme. These include the Spawell golf grounds and outer sections of the River Dodder corridor, as well as major formal amenities of Bushy Park, Rathfarnham Castle, and the River Dodder

corridor, the latter being an area of outstanding character and amenity. The Construction Phase will result in changes to Rathfarnham Castle Demesne, as described in Section 17.4.3.2.4. The potential townscape / streetscape and visual impact of the Construction Phase on open space at Rathfarnham Castle Demesne is assessed to be **Negative, Significant and Temporary / Short-Term**.

8.356. The potential townscape / streetscape and visual impact of the Construction Phase on Bushy Park and The River Dodder Corridor is assessed to be **Negative, Slight and Temporary / Short-Term**.

8.357. The potential townscape / streetscape and visual impact of the Construction Phase the open space area between Dodder View Road, Woodview Cottages and Church Lane Park is assessed to be **Negative, Significant and Temporary / Short-Term**.

8.358. Direct impact to residential properties is considered to have the greatest impact visually. The EIAR sets out that construction of the Proposed Scheme will require the acquisition from 72no. residential properties as follows:

- Nos. 317, 319, 321, 323, 325 and 327 Templeogue Road (6no)
- Nos. 311, 313 and 315 Templeogue Road (3no)
- Nos. 44 and 45 Templeogue Road (2no)
- 11, 14 and 15 Fortrose Park (3no)
- Nos. 8, 9, 10, 11 and 12 Rathfarnham Wood (5no)
- Nos. 141, 143, 145, 147, 149, 151 and 153 Rathfarnham Road (7no.)
- Nos. 51, 53, 55, 57, 59, 61, 63, 65, 67, 69 and 71 Rathfarnham Road (11no.)
- Nos. 34, 36, 38, 40, 42, 44, 46, 48, 50 Rathfarnham Road (9no)
- No. 80 Earls Court, Terenure Road (1no.)
- Nos. 74, 74A, 76, 76A and 78 Terenure Road East (5no.)
- Nos. 1, 2, 3, 4, 5, 6, 7, 8 and 9 Town Houses, Terenure Road East (9no.)
- Nos. 59, 61, 65, 67 and 69 Terenure Road East (5no.); and
- Nos. 52, 54, 56, 58, 60 and 62 Terenure Road East (6no.).

***Inspectors Note:** Having checked the deposit maps and submissions received with the CPO 317377-23, I calculate that the 'permanent' CPO acquisition relates to some 121 plots, 73 of which are residential, No 63 TRE is included in the CPO and NTA's response to submission but was for some reason inadvertently not included in the NTA's overall submitted summary of affected residential plots.

8.359. The magnitude of effects to the foregoing is stated to be Negative, Very Significant to Temporary / Short-Term in duration.

8.360. In addition to the foregoing the following properties will also be subject to similar acquisition however these properties have been altered at the front garden to accommodate car parking and as such will experience a lower magnitude of effects i.e. significant / very significant but also for a temporary period.

- Centra Texaco (Rathfarnham Road);
- Rathfarnham Dental Practice (No. 151 Rathfarnham Road);
- Rathfarnham Orthodontics (No. 147 Rathfarnham Road);
- Terenure Synagogue (32a Rathfarnham Road);
- Terenure Enterprise Centre (private landing);
- R&D Dental Practice (No. 74a Terenure Road East);
- The Roslin Lodge (No.63 Terenure Road East); and
- A number of private landings along Richmond Street South, Richmond Row, Camden Street and Harrington Street for footpath works..

8.361. The magnitude of effects to the foregoing is stated to be Negative, Very Significant to Temporary / Short-Term in duration.

8.362. Works will also result in visual impacts for other residential and non-residential properties located along, fronting and viewing the Proposed Scheme. Impacts will arise from the provision of construction compounds, general disturbance, demolition, excavation and construction works within the public road corridor of the Proposed Scheme. Construction works will be generally openly visible from these properties, or filtered by intervening vegetation.

8.363. The magnitude of townscape and visual impact effects to the foregoing is stated to be Moderate / Significant, Temporary / Short-Term, Negative in duration.

- 8.364. Impacts to landscape largely relates to the removal of trees and vegetation, where it is necessary to remove vegetation and trees, I note that the applicant will seek to replace such vegetation with similar species or species that are appropriate to urban settings. I further note that whilst similar species will be sought out, the replacement vegetation will be of a semi mature stage of growth. This is reasonable, and common practice in such circumstances. The magnitude of effects in relation to the removal and replanting of trees and vegetation is assessed as **Negative, Significant / Very Significant and Temporary / Short-Term.**
- 8.365. Construction changes will occur over a period of 1 to 2 years and as such as mentioned above are for a short period of time. Impacts will therefore not be significant in the long term.
- 8.366. The operational phase of the development will result in impacts to many areas, with alterations in the road corridor and changes in traffic, pedestrian and cycle movements are features. It is not however anticipated these aspects in themselves will give rise to significant landscape, townscape or visual effects. Changes in road corridors, including in traffic signalisation, signage, and in carriageway allocation and traffic movements are a common and regular aspect of active road and traffic management for urban roads and streets. Therefore, such changes may also be considered as part and parcel of any urban streetscape environment.
- 8.367. I highlight there will be substantial tree planting throughout, to medians, roadside open spaces and streets which will more than compensate for the impact from removed trees. There will be a notable improvement at Templeogue Arch where the setting of this historic landmark public access will be provided, and an appropriate public realm scheme. There will be improvements to open space at Bushy Park and Rathdown Drive with provision of upgraded pedestrian and cycle access. There will be the provision of a new boundary wall to the castle demesne in roughcast render which, while less aesthetically pleasing than the sections of existing stone boundary wall, will represent a neutral change when compared to the overall inharmonious boundary treatment which varies in quality and condition of materials used. There will be provision of substantial new tree planting within the castle demesne to consolidate the new edge to the woodland group and ensure the amenity of the open space is restored. The Operational Phase will not alter the overall townscape character of TRE to Charleville Road section but will result in both substantial localised negative and

positive changes to the streetscape character. Despite the adverse impacts on trees and properties there will be a substantial localised improvement in some areas of streetscape and the effect across the overall section will become positive over the long-term as proposed planting matures.

8.368. The proposed development as mentioned above will result in many positive benefits to landscape and the streetscape through the provision of additional planting and improved surfaces and layouts of public circulation areas, pavements, cycle lanes and open spaces. The insertion of SUDs measures will soften the existing landscape and provide additional opportunities for biodiversity to thrive.

Mitigation

8.369. In order to reduce the magnitude of effects to landscape, streetscape and townscape it is proposed to protect vegetation that is to be retained during construction through the use of protective fencing. Where boundaries and vegetation are to be removed a record will be kept in order to replace the features with similar items. Where possible vegetation will be retained and replanted. All works will be carried out in accordance with a CEMP.

8.370. No mitigation or monitoring is proposed for the operational phase of the development.

Residual Impacts

8.371. Whilst mitigation will achieve a reduced impact and protect trees and vegetation to be retained, it will not eradicate the impacts listed above. The removal of mature trees cannot be mitigated and as such significant Construction Phase impacts at a local level remain unchanged in the post-mitigation and monitoring scenario. Operational phase impacts will improve with time as vegetation matures and will therefore not be significant. In conclusion therefore, significant long-term impacts to landscape and visual amenity do not arise in relation to the proposed development.

Conclusion

8.372. Regard is had to photomontages 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 to 15 years post-completion of the Construction Phase. The Photomontages have been prepared in

accordance with the methodology set out in Section 17.2.4.7 and are included in Figure A17.2 in Volume 3 of this EIAR.

8.373. In the Operational Phase localised residual effects will remain for properties, including protected structures, experiencing permanent land acquisition. There will be overall positive effects for all sections of the scheme, excluding Nutgrove to Terenure Road North, which will have a neutral effect. The Proposed Scheme provides for improvements in the urban realm, which will provide positive long-term effects for the townscape and visual character, most notably at centres of Rathgar and Rathmines and along the route from Grand Canal to Dame Street. The restoration and reincorporation of Templeogue Arch into the streetscape will also be a notable improvement. The Proposed Scheme will also provide for a significantly enhanced level of service for public transport and for pedestrian / cycle connectivity.

8.374. I have considered all of the written submissions made in relation to Landscape, Streetscape and Visual and the relevant contents of the file including the EIAR. I am satisfied that the potential long term impacts on Landscape, Streetscape and Visual can be avoided, managed and/or mitigated by measures that form part of the proposed scheme, by the proposed mitigation measures and with suitable conditions. I am therefore satisfied that the potential for direct or indirect long term impacts on Landscape, Streetscape and Visual can be ruled out. I am also satisfied that cumulative effects, in the context of existing and permitted development in the surrounding area and other existing and proposed development in the vicinity of the site including the proposed the other bus connects routes are not likely to arise.

Table 16 Landscape & Visual Summary of potential and residual effects.

Potential impacts	Magnitude of Impact	Mitigation	Residual Impact
Construction phase Impacts			
Tallaght Road to Rathfarnham Road	High	Protect trees to lessen effects. Prepare an inventory of boundary details and accesses, planting, paving, and other features. Maintain Access to properties and public open spaces.	Negative Temporary / Moderate Short-Term (west of Templeogue) Negative Significant / Very Significant Temporary / Short-Term (Templeogue to Rathfarnham Road)

		Construction works will be managed by the preparation of a CEMP.	
Nutgrove Avenue to Terenure Road North	Very High	As Above	Negative Very Significant Temporary / Short-Term
Terenure Road North to Charleville Road	High	As Above	Negative Very Significant Temporary / Short-Term
Charleville Road to Dame Street	Medium	As Above	Negative Moderate Temporary / Short-Term
Operational Phase Impacts			
Tallaght Road to Rathfarnham Road	Medium / High	None	Positive Significant Long-Term
Nutgrove Avenue to Terenure Road North	Very High	None	Neutral Moderate Long-Term
Terenure Road North to Charleville Road	Medium / High	None	Positive Moderate Long-Term
Charleville Road to Dame Street	Medium / High	Positive	Positive Significant

Roads and Traffic

8.375. Section 6 of the EIAR examines the impact of the proposed scheme on traffic. For the purpose of assessment, the proposed route has been considered under four sections:

- **Section 1** - Tallaght Road to Rathfarnham Road
- **Section 2** - Nutgrove Avenue to Terenure Road North – Grange Road, Rathfarnham Road
- **Section 3** - Terenure Road North to Charleville Road – Terenure Road East, Rathgar Road; and
- **Section 4** - Charleville Road to Dame Street.

Baseline Conditions

8.376. Overall cycling infrastructure provision on the corridor consists of 64% cycle priority outbound (18% cycle track, 26% mandatory cycle lane, 20% advisory cycle lane), with 46% inbound (13% cycle track, 1% mandatory cycle lane, 32% advisory cycle lane). Bus services along the Proposed Scheme currently operate within a constrained and congested environment, with 18% priority outbound and 44% priority inbound on the corridor. Current deviation for bus journey times is 11 minutes, on both the Templeogue to Terenure and Rathfarnham to City Centre sections, any increases in traffic levels will exacerbate bus time deviations.

8.377. The following section of this report will outline the base line conditions in relation to the relevant sections mentioned above.

Section 1 –Tallaght Road to Rathfarnham Road

8.378. This section commences on the R137 Tallaght Road east of the M50 junction 11.

Section 1 is approximately 3.7km in length and consists of the R137 Tallaght Road and R137 Templeogue Road up to Terenure Cross.

8.379. The R137 Tallaght Road and Templeogue Road between the Spawell Roundabout and the R817 Cypress Grove Road benefit from a segregated footpath on the northern side of the road of approximately 3.0m wide. On the southern side of the road there are intermittent walking facilities.

8.380. Between the junctions with the R817 Cypress Grove Road and the R112 Templeville Road, footpaths and public lighting are provided on both sides of the R137 Templeogue Road. In general, the footpaths are approximately 1.8m wide. Shared walking and cyclist space is present adjacent to the R137 Templeogue Road, west of the Templeogue Road / Templeogue House junction. From Fortfield Road to the R114 Rathfarnham Road, there is a narrow roadside footpath along northern side of the carriageway of approximately 1.5m wide. The pedestrian facilities on the southern side of the road are segregated from the carriageway by a stone wall and approximately 3.0m wide grass verge from Fortfield Road for approximately 750m north-east until the pedestrian and cycle access to Rathdown Drive; at this point they rejoin Templeogue Road. There is streetlighting throughout.

8.381. Rathdown Drive, Rathdown Crescent and Rathdown Park are residential streets which broadly run parallel to the R137 Templeogue Road and provide an alternative link to the R114 Rathfarnham Road (Section 2 of the Proposed Scheme) which

bypasses Terenure Village Centre. There is a footpath of approximately 1.8m wide provided the southern side of Rathdown Drive, and on both sides of the road along Rathdown Crescent and Rathdown Park. Controlled pedestrian crossing facilities (i.e. signalised and/or zebra crossings) can be found at the following locations and benefit from dropped kerbs and tactile paving:

- On each arm of the Spawell Roundabout, a four-arm roundabout between the R137 Tallaght Road, L4019 Wellington Lane, R137 Templeogue Road and L4023 Spawell Road (staggered toucan crossing with guard rails on the southern, eastern and western arms and a direct crossing on the northern arm).
- At the accesses to The Contract Bridge Association of Ireland on the northern side of the road and Cheeverstown House on the southern side of the road (staggered toucan crossing with guard rails, both substandard in relation to width)
- On two arms of the four arm signalised crossroads junction between the R137 Templeogue Road, R187 Cypress Grove Road and R817 Old Bridge Road, on all but the R137 Templeogue Road eastern and southern arms (staggered toucan crossing with guard rails)
- A signalised raised table crossing in Templeogue Village, approximately 18m east of the service station exit
- Across all arms of the signalised crossroads junction at the R137 Templeogue Road, R112 Templeville Road and R112 Springfield Avenue (standard crossing with guard rails).
- Across the R137 Templeogue Road northern and southern arms of the signalised crossroads junction with Fortfield Road and Bushy Park House (pelican crossings without guard rails). The two minor arms have uncontrolled crossings.
- At the access to Rathdown Avenue and Terenure College there is a pelican crossing across the R137 Templeogue Road (without guard rails).
- At the access to Lakelands Park there is a pelican crossing across the R137 Templeogue Road (without guard rails); and

- Across the R137 Templeogue Road and R818 Terenure Road West arms of the three-arm signalised junction immediately west of Terenure Cross (pelican crossings without guard rails).

8.382. Existing cycle facilities along this section of the Proposed Scheme are as follows:

- Segregated two-way cycle track approximately 2.0m wide on the northern side of the R137 Tallaght Road and Templeogue Road between the M50 Interchange and the access to Templeogue House. The path links to the overbridge crossing of the M50 Motorway which provides pedestrian and cycle access to Tallaght to the west. The two-way cycle track is off-road, offering an increased level of service to users.
- Segregated cycle track for approximately 785m on the R137 Tallaght Road, to the east of Cheeverstown House.
- On-road cycle lanes of approximately 1.25m wide on R817 Cypress Grove Road, mandatory 70m, and then on-road advisory cycle lanes present.
- Through Templeogue Village, the cycle lane moves off-road for approximately 130m where it is segregated from the carriageway by parking bays.
- At the R137 Templeogue Road / R112 Templeville Road / R112 Springfield Avenue signalised crossroads, there are toucan crossings while at the Fortfield Road signalised junction, cyclists are required to share green time with the vehicular traffic phase or dismount and cross at the pedestrian crossings.
- On-road advisory cycle lane approximately 1.25m wide approaching the junction with the R112 Templeville Road and Springfield Avenue.
- On-road advisory cycle lane approximately 1.0m wide, travelling 1km northbound on R137 Templeogue Road, from the Terenure College access gate.
- Two-way off-road shared walking and cyclist facility through Bushy Park travelling southbound; and
- On-road advisory cycle lane of approximately 1.0m wide between Rathdown Drive and Terenure Cross at Rathfarnham Road.

8.383. There are three locations of Sheffield cycle parking stands in proximity to Section 1 of the Proposed Scheme. The first is located to the east of Templeogue Village where there are four stands (able to accommodate up to eight bicycles). Another is located on Rathdown Avenue to the north of Bushy Park also comprising four stands. At the corner of Terenure Cross, on the eastern side of the R114 Rathfarnham Road, there are a further six Sheffield stands (able to accommodate up to 12 bicycles). These six Sheffield stands are also designated Bleeperbike cycle parking racks. There are no DublinBikes cycle hire locations along Section 1 of the Proposed Scheme.

8.384. There are currently 19 bus stops along Section 1 of the Proposed Scheme. Bus stops in Templeogue Village are indented, alongside stop 1130 (on R137 Templeogue Road, 60m east of R817 Cypress Grove Road), all other bus stops are situated inline with bus lanes. The majority of bus stops comprise static timetable information and accessible kerbs while only four include RTPI. Just under half of bus stops include shelters and seating. Table 6.6 of the EIAR outlines the availability of bus stop facilities at the existing 19 no. bus stops along Section 1 of the Proposed Scheme.

8.385. The R137 Tallaght Road (west of the Spawell Roundabout) and R137 Templeogue Road are dual carriageways with three lanes in both directions (two lanes for all traffic and a bus lane) with the dual arrangements as far as the Cypress Grove Road junction. The carriageway is subject to a 60km/h speed limit before reducing to 50km/h west of Corrybeg estate. Following the Cypress Grove Road junction the R137 Templeogue Road carriageway becomes single lane in both directions with non-continuous sections of bus lane as far Terenure Place. The existing major junction arrangements along the section are as follows:

- Spawell four-arm roundabout,
- R137 Templeogue Road / R817 Cypress Grove Road and Old Bridge Road four-arm signalised junction;
- R137 Templeogue Road / R112 Templeville Road and Springfield Avenue four arm signalised junction;
- R137 Templeogue Road / Fortfield Road / Bushy Park House four arm signalised junction; and

- R137 Templeogue Road / R818 Terenure Road West / R137 Terenure Place three-arm signalised junction.

8.386. There is no formal parking present along this section of the Proposed Scheme. The following parking is present at the alternative cycle route, showing parking within the vicinity, however this is noted as informal parking:

- Informal on-street parking is permitted along the residential streets of Rathdown Drive, Rathdown Crescent and Rathdown Park with double yellow lines present approaching and at the corners of junctions. There are no loading bays along these residential streets.

Section 2 – Nutgrove Avenue to Terenure Road North – Grange Road, Rathfarnham Road

8.387. This Section of the Proposed Scheme consists of the R821 Grange Road and the R114 Rathfarnham Road running from the signalised junction with Nutgrove Avenue / Rathfarnham Wood to Terenure Cross, the four arm signalised junction between the R137 Terenure Road North, R114 Terenure Road East, R114 Rathfarnham Road and R137 Terenure Place (which is the end of Templeogue Section of the Proposed Scheme). Section 2 of the Proposed Scheme is approximately 1.8km in length and travels through a predominantly residential area.

8.388. A proposed alternative quiet route for cyclists as part of the Proposed Scheme travels eastbound from the R114 Rathfarnham Road to the R114 Terenure Road East comprising the residential streets; Bushy Park Road, Wasdale Park, Wasdale Grove, Victoria Road, Zion Road and Orwell Road. This provides a quiet cycle route connection between Sections 2 and 3 of the Proposed Scheme.

8.389. There are continuous walking facilities provided along Section 2 of the Proposed Scheme, with footways and public lighting provided on both sides of the carriageway along the entirety of this section. In general, the footways are approximately 1.8m wide.

8.390. There are several pedestrian crossings along Section 2 of the Proposed Scheme. All controlled crossings benefit from tactile paving and dropped kerbs and can be found at the following locations:

- At three arms of the R821 Nutgrove Avenue and Grange Road / L8385 Rathfarnham Wood / R822 Grange Road four-arm signalised junction. A traffic island with pedestrian refuge is present at the R822 Grange Road arm.
- At the R822 Grange Road and R115 Willbrook Road arms of the three-arm signalised junction with the R115 Rathfarnham Road, there are signalised crossings. A traffic island with pedestrian refuge is present on the R115 Willbrook Road arm.
- Across the dual carriageway section of the R114 Rathfarnham Road, approximately 100m south of the car park access for Rathfarnham Castle, there is a staggered pelican crossing with guardrails.
- At the four-arm signalised junction between the R114 Rathfarnham Road, L8103 Castleview and L4014 Main Street, across all arms except the R114 Rathfarnham Road North arm. Traffic islands with pedestrian refuge are present at the L8103 Castleview and R114 Rathfarnham South arms.
- At each arm of the four-arm signalised junction between the R114 Rathfarnham Road and the R112 Dodder View and Dodder Park Roads, there are signalised crossings on all arms. There is pedestrian refuge on the traffic islands on the R112 arms.
- Across the R114 Rathfarnham Road North and Bushy Park Road arms of the signalised three arm junction there are pelican crossings without guardrails. There is also a pedestrian refuge on the traffic island in the R114 Rathfarnham Road North arm.
- At Terenure Cross, there are staggered signalised crossings with guard rails of the R137 Terenure Place and Terenure Road North Arms. The crossings of the R114 Rathfarnham Road and Terenure Road East are uncontrolled. Pedestrian refuge on the traffic islands is present on all crossings except for R114 Terenure Road East arm; and
- At all arms at the Orwell Road / Zion Road three-arm signalised junction there are signalised pedestrian crossings. The slip road from Zion Road onto Orwell Road has an uncontrolled crossing.

8.391. Existing cycle facilities along Section 2 of the Proposed Scheme are as follows:

- Off-road cycle facility travelling southbound on Grange Road between the R822 Grange Road and the R115 Willbrook Road. Cyclists share the bus lane travelling northbound.
- On-road mandatory cycle lanes approximately 1.25m wide approximately 50m south of Crannagh Road to Brookvale Road; and
- On-road cycle lane travelling southbound for the majority of carriageway between Brookvale Road and the R114 Terenure Road East. The cycle lane varies between advisory and mandatory. Cyclists share the bus lane travelling northbound.

8.391.1. There are a total of 11 Sheffield cycle parking stands (able to accommodate up to 22 bicycles) along the L4014 Main Street. There are five Sheffield cycle parking stands and six secure parking lockers at bus stop 1329 on Grange Road, outside the St Mary's School access. Immediately north of the R114 Rathfarnham Road / R122 Dodder Park Road and Dodder View Road junction, there are a further four Sheffield stands (able to accommodate up to eight bicycles) on the eastern side of the road. There are no DublinBikes cycle hire locations along Section 2 of the Proposed Scheme.

8.392. Bus lanes are intermittent along Section 2 of the Proposed Scheme, and there are 18 bus stops. All bus stops along this section are inline along the carriageway, usually accommodated within the bus lane. The majority of bus stops along this section do not have RTPI but do provide basic timetable information. Approximately half of the bus stops provide shelters and seating and most provide accessible kerbs. Table 6.8 of the EIAR outlines the availability of bus stop facilities at the existing bus stops along Section 2 of the Proposed Scheme.

8.393. The R114 Grange Road / Rathfarnham Road along Section 2 of the Proposed Scheme is single carriageway, generally with one lane for all traffic in each direction and intermittent sections with an additional lane for buses. For a section of approximately 300m between the junctions with the R114 Butterfield Avenue and the L8103 Castleside Drive, the road has a general traffic lane and a bus lane in both directions. The road generally travels in a south to north direction and is subject to 50km/h speed limit.

8.394. The existing major junction arrangements along Section 2 of the Proposed Scheme are as follows:

- R821 Nutgrove Avenue and Grange Road / L8385 Rathfarnham Wood / R822 Grange Road four-arm signalised junction.
- R115 Rathfarnham Road / Grange Road / Willbrook Road three-arm signalised junction.
- R114 Rathfarnham Road / R115 Rathfarnham Road / R114 Butterfield Avenue three-arm signalised junction.
- R114 Rathfarnham Road / L8103 Castleside Drive / L4014 Main Street four-arm signalised junction.
- R114 Rathfarnham Road / R112 Dodder Park Road / R112 Dodder View Road.
- R114 Rathfarnham Road / Rathdown Park three-arm signalised junction.
- R114 Rathfarnham Road / Bushy Park Road three-arm signalised junction; and
- Terenure Cross four-arm signalised junction.
- Orwell Road / Zion Road three-arm signalised junction.

8.395. There are parking restrictions along most of Section 2 of the Proposed Scheme, which is marked by double yellow lines throughout. There are no loading bays. Parking can, however, be found at the following locations:

- Seven designated pay and display and permit parking spaces on Grange Road/ Rathfarnham Road between Grange Road and Dodder Park Road, immediately north of St Mary's Avenue; and
- 14 designated pay and display and permit spaces and one disabled space on the R114 Rathfarnham Road between Cormac Terrace and Terenure Road East.

8.396. Further parking is provided on side roads and off-street car parks along Section 2 of the Proposed Scheme.

Section 3 – Terenure Road North to Charleville Road – Terenure Road East, Rathgar Road.

8.397. This Section of the Proposed Scheme runs from the R137 Terenure Road North at Terenure Cross to the four-arm junction between the R114 Rathgar Road East and South, Grosvenor Road and Charleville Road. The extent of Section 3 of the Proposed

Scheme is approximately 1.8km in length and travels through a predominately residential area between Terenure, Rathgar and Rathmines Village Centres.

8.398. There are footways and public lighting on both sides of the carriageway along the entirety of Section 3 of the Proposed Scheme that are approximately 2.0m wide.

8.399. The following priority junctions include a raised table facility on the minor arm which manages vehicle speeds and in turn, aids pedestrians crossing:

- R114 Terenure Road East / Greenmount Road priority junction;
- R114 Terenure Road East / Brighton Road priority junction;
- R114 Rathgar Road / Winton Avenue priority junction;
- R114 Rathgar Road / Garville Road priority junction;
- R114 Rathgar Uncontrolled crossings across priority junctions at side roads benefit from dropped kerbs
Rathgar Road / Grosvenor Road priority junction;
- R137 Terenure Road North / Whitton Road priority junction;
- R137 Terenure Road North / St Enda's Road priority junction;
- R137 Harold's Cross Road / Brighton Square (South) priority junction;
- R137 Harold's Cross Road / Mount Tallant Avenue; and
- R137 Harold's Cross Road / Brighton Square (North) priority junction.

8.400. There are numerous uncontrolled crossings at priority junctions at side roads which benefit from dropped kerbs.

8.401. Existing cycling facilities along Section 3 of the Proposed Scheme are as follows:

- On-road advisory cycle lane approximately 1.5m wide in both directions between Terenure Cross and Brighton Road;
- Shared cycle/ bus lanes R114 Terenure Road East / Rathgar Avenue / R114 Rathgar Road / Orwell Road four-arm signalised junction within Rathgar Village; and
- On-road mandatory cycle lane approximately 1.75m wide travelling southbound from Rathgar Village to Charleville Road. Cyclists share the bus lane travelling northbound. There is however, an advisory on-road cycle lane

travelling northbound at the beginning and end of this section of approximately 1.25m wide.

8.402. There are some 21 Sheffield cycle parking stands able to accommodate up to 42 bicycles at various locations along this section of the Proposed Scheme, and a further 11 stands a short distance from this section along the R114 Rathfarnham Road and Highfield Road. The additional offline link along the R137 Terenure Road North and R137 Harold's Cross Road has intermittent on-road cycle lanes and bus lanes.

8.403. Bus lanes are intermittent along this section of the route. There are 13 bus stops along Section 3 of the Proposed Scheme between the R137 Terenure Road North and Charleville Road. There are 13 bus stops along the R137 Terenure Road North and R137 Harold's Cross Road. Only a small proportion of the bus stops provide real-time information and around a third provide shelters and seating. The majority of the bus stops along this section are flag and pole stops, and provide timetable information and accessible kerbs, and all bus stops are inline along the carriageway. Table 6.10 of the EIAR outlines the availability of bus stop facilities at the existing 13 bus stops between the R137 Terenure Road North and Charleville Road.

8.404. The existing major junction arrangements along Section 3 of the Proposed Scheme are as follows:

- R114 Terenure Road East / Rathgar Avenue / R114 Rathgar Road / Orwell Road four- arm signalised junction;
- R114 Rathgar Road North and South / Frankfort Avenue / Leicester Avenue four- arm signalised crossroads junction; and
- R114 Rathgar Road East and South / Grosvenor Road / Charleville Road three- arm signalised junction.

8.405. This section is subject to 50km/h speed limit. The majority of Section 3 of the Proposed Scheme is free of on-street parking and loading due to the residential nature of the area and that most properties have driveways leading off the main road to park their vehicles. There are no double yellow line road markings, therefore, occasional parked vehicles are observed within the bus lane (which is only in operation on weekday peaks). There are some 52 pay and display parking spaces / loading bays along section 3 of the proposed scheme, the location of which is set out

in section 6.3.4.5 of the EIAR. There are also several side streets with designated pay and display and permit parking, with direct access from this corridor.

Section 4 – Charleville Road to Dame Street.

8.406. This Section of the Proposed Scheme runs from the four-arm junction between R114 Rathgar Road, Grosvenor Road and Charleville Road to the end of the Rathfarnham to City Centre section of the Proposed Scheme at the R137 Dame Street. Section 4 of the Proposed Scheme is approximately 2.6km long and travels northwards through an urban residential and retail area between Rathmines Village centre and the south of the City Centre

8.407. There is continuous footway provision on both sides of the carriageway along this final section. Along the frontage of the retail units in Rathmines Village Centre, the footway is approximately 3.0m wide which is considered adequate for an area with a mid-high level of pedestrian activity in accordance with DMURS. Outside of Rathmines Village, where there is a more residential nature, the footway reduces to approximately 1.8m wide which is considered adequate as there is likely to be less pedestrian activity here. Public street lighting is provided throughout. There is generally wide and smooth footways on both sides of the carriageway to the north of Canal Road, along the frontage for various retail units. Given the urban nature of this section of route, there are numerous uncontrolled crossings across priority junctions that benefit from dropped kerbs and a large number of controlled pedestrian crossings along this Proposed Scheme section which benefit from tactile paving and dropped kerbs.

8.408. Existing cycle facilities along Section 4 of the Proposed Scheme are as follows:

- On-road cycle lanes travelling southbound approximately 1.75m wide between Charleville Road and R111 Canal Road;
- Intermittent on-road cycle lanes approximately 1.75m wide in both directions between R111 Canal Road and R137 Dame Street. Where there is no cycle lane, cyclists share the road with a bus lane;
- On-road mandatory cycle lanes and a clearway operational 24 hours a day, travelling northbound between Charlemont Mall and R811 Harrington Street (approximately 260m length); and

- On-road advisory cycle lanes or shared cycle and bus lanes travelling northbound between the R811 Harrington Street to R137 Dame Street. Travelling southbound, they are typically advisory or within the bus lane.

8.409. Given the urban nature of Section 4 of Proposed Scheme, there are numerous cycle parking locations along the R114 at regular intervals. Within Rathmines Village Centre, there are approximately 86 Sheffield stands (able to accommodate up to 172 bicycles). Between the R111 Canal Street and R110 Cuffe Street, there are approximately 93 Sheffield stands (able to accommodate up to 186 bicycles). Finally, between the R110 Cuffe Street and R137 Dame Street, there are approximately 69 Sheffield stands (able to accommodate up to 138 Bicycles) and five 'Hoop' stands. In addition, the DublinBikes cycle hire scheme has numerous bicycle stations along the neighbouring streets of the R114 between the R111 Canal Street and R137 Dame Street.

8.410. Bus lanes are intermittent along this section of the route. There are 24 bus stops along Section 4 of the Proposed Scheme. Approximately half of the bus stops along this section provide shelters and seating and all but one of the bus stops are accommodated inline along the carriageway, with the exception of Bus Stop 1070 in Rathmines. Table 6.13 of the EIAR outlines the availability of bus stop facilities at the existing 24 bus stops between Charleville Road and the R137 Dame Street.

8.411. Between Charleville Road and the R111 Canal Road, the R114 comprises Rathgar Road and Rathmines Road Lower which is a continuous single carriageway road generally with one lane travelling in each direction and an additional bus lane travelling northbound only. The road travels in a south to north direction and is subject to 50km/h speed limit. Between the R111 Canal Road and R137 Dame Street, the R114 generally comprises three traffic lanes; one lane of traffic in each direction with an additional bus lane intermittently in the northbound and southbound directions. In many sections the opposing lanes are segregated by lit bollards and / or a white hatched central reservation. The speed limit reduces to 30km/h closer to the City Centre from the junction with R811 Harcourt Road. The existing major junction arrangements along this section of the scheme are set out in detail in section 6.3.5.4 of the EIAR.

8.412. There are approximately 497 on-street parking spaces within 200m of the area, along a number of side streets, alongside a number of private car parks.

Potential Impacts

8.413. For the purpose of the assessment of potential impacts the NTA has also considered the proposed route in 4 sections as above. The division line between sections has been determined by grouping similar carriageway types together. These sections have been further subdivided into 18 sub-sections, according to the types of construction works required. The sections / sub-sections are:

- Section 1: Tallaght Road, Templeogue Road to Rathfarnham Road:
 - Section 1a: M50 to Spawell Roundabout;
 - Section 1b: Spawell Roundabout;
 - Section 1c: Spawell Roundabout to Cypress Grove Junction;
 - Section 1d: Cypress Grove Junction to Templeville Road;
 - Section 1e: Templeville Road to Rathdown Avenue;
 - Section 1f: Rathdown Avenue to Terenure Road North; and
 - Section 1g: Rathdown Crescent, Rathdown Park, Bushy Park Road, Wasdale Park, Wasdale Road, Wasdale Grove, Victoria Road, Zion Road and Orwell Road.
- Section 2: Nutgrove Avenue to Terenure Road North – Grange Road, Rathfarnham Road:
 - Section 2a: Grange Road Junction to Main Street Junction;
 - Section 2b: Main Street Junction to Dodder Park Road;
 - Section 2c: Dodder Park Road to Terenure Junction;
 - Section 2d: Rathfarnham Junction to Mount Tallant Avenue; and
 - Section 2e: Mount Tallant Avenue to Harold's Cross.
- Section 3: Terenure Road North to Charleville Road – Terenure Road East, Rathgar Road:
 - Section 3a: Terenure Junction to Rathgar Avenue; and
 - Section 3b: Rathgar Avenue to Rathmines Road.

- Section 4: Charleville Road to Dame Street:
 - Section 4a: Rathgar Road to Grove Road;
 - Section 4b: Grove Road to Cuffe Street;
 - Section 4c: Cuffe Street to Dame Street; and
 - Section 4d: Offline Sections.

8.414. I will consider potential impacts in relation to the individual mode, i.e. walking, cycling, bus and private car with reference to the relevant section and in relation to both the construction and operational phases of the development.

Construction phase

8.415. In relation to the full proposed scheme, haulage of materials is expected to be a maximum of 26 HGV trips per day, will access / egress the construction works during the AM and PM Peak Hours. The applicant has identified haul routes as follows:

- M50 Motorway and,
- N81 National Road.

8.416. Traffic flows on all routes and at site compounds and works areas will be managed by the construction traffic management plan and the magnitude of impacts arising from these movements is stated as Negative, Slight and Short-term effect. No further analysis is therefore carried out in this regard by the applicant. Given the levels are comfortably below the thresholds set out in TII's Guidelines for Traffic and Transport Assessments.

8.417. Disruptions to pedestrian and cycle movement will also occur on a temporary basis as works proceed, however alternative routes and access will be provided as required. Similarly bus stops may require temporary relocation but access will be retained in order ensure continuity in the service.

8.418. It is of note that private parking for construction workers will be limited at compounds and will not accommodate the required 200 to 250 staff which will work on the scheme. The use of public transport will therefore be required by staff and impacts arising from construction staff traffic are therefore not expected to be significant.

8.419. Overall, the magnitude of impacts associated with the construction of the proposed scheme range between Negative, Slight and Temporary to Negative, Moderate and Temporary.

Operational Phase

8.420. In terms of the operational impacts, I note that the assessment of impacts relates to the functionality of the infrastructure to be provided. The applicant has developed a set of criteria for each mode which are outlined in tables 6.17 and 6.20 for pedestrians and cyclists, respectively. Similarly bus infrastructure is examined in relation to both the frequency of service to be provided and the infrastructure such as shelter, seating, accessible kerbs etc.

8.421. In relation to parking the applicant has outlined the number of spaces to be lost at each location which is set out hereunder and has provided a justification for such losses and in some cases has provided alternative solutions. The applicant has also examined parking and loading requirements for businesses in the area. It is of note that Dublin City Council have raised concerns in relation to the loss or relocation of parking and has requested that the scheme provides for set down and loading areas to serve local businesses. Several residents have also raised concerns within their submissions in relation to the loss of parking both on street and within their properties. Such issues have been examined within the assessment part of this report above and will not be repeated hereunder, this section of the EIAR should therefore be read in conjunction with the assessment section of this report. It is important to note however that no significant effects are expected to arise in this regard and the applicant has demonstrated that adequate car parking has been retained within both the on-street locations (as detailed below) and within private residences (as detailed within the assessment section above).

Pedestrian Infrastructure.

8.422. In terms of operational impact in relation to pedestrian infrastructure it is important to note at the outset that all impacts to all four sections of the proposed scheme are expected to be positive and long term. This is as a result of the proposed improvements to the existing pedestrian facilities in the form of additional crossing locations, increased pedestrian directness, provision of traffic calming measures to reduce vehicle speeds, improved accessibility and increased footpath and crossing widths. I note that all facilities have been designed in accordance with the principles

of DMURS and the National Disability Authority (NDA) 'Building for Everyone: A Universal Design Approach' (NDA 2020) with regards to catering for all users, including those with disabilities. For ease of reference details of junctions and relative effects are outlined in tables 6.23, 6.27, 6.32 and 6.37 of the EIAR.

Cycle Infrastructure

8.423. Cycle infrastructure impacts are also considered to be positive and long term in terms of magnitude of effects. A number of submissions raised concerns in relation to junction layouts, cycle lane widths, treatment of cycle lanes at bus stops and the turning movements provided for cyclists at junctions. Similar to the foregoing all issues have been examined in detail within the assessment section of this report and will not be repeated hereunder, save to say that I am satisfied that the design approach to this infrastructure has been adequately justified by the applicant and I am satisfied that no significant negative impacts will arise in this regard. The use of dedicated cycle lanes, quiet roads in the case of cyclist diversions from the main route and the segregation of general traffic will provide for a significantly enhanced experience for cyclists over that currently available. I am satisfied that the applicants have examined the potential for impacts to arise in relation to the proposed cycle infrastructure and have examined all reasonable alternatives in this regard also.

Bus Infrastructure

8.424. It is proposed that there will be a total of 16 bus stops along Section 1 of the Proposed Scheme – eight inbound and eight outbound. This is three fewer outbound stops than at present. The layout of new bus stops is considered to better serve the existing and future catchment and be closer to existing and new pedestrian crossing facilities for improved convenience. Table 6.25 of the EIAR outlines a summary of the changes to the bus stop infrastructure along Section 1 of the Proposed Scheme.

8.425. Along Section 1 it is proposed that only one bus stop will be indented, all others all bus stops will be provided inline within dedicated bus lanes along the entirety of the corridor, meaning that buses will not incur delay when setting off after picking up passengers. Improvements in the provision of real-time information, shelters, seating and accessible kerbs at the bus stops throughout Section 1 of the Proposed Scheme are assessed as providing an overall positive impact for bus passengers.

- 8.426. It is proposed that there will be a total of 15 bus stops along Section 2 of the Proposed Scheme – seven inbound and eight outbound. This is three fewer than the existing situation. The layout of new bus stops is considered to better serve the existing and future catchment and be closer to existing and new pedestrian crossing facilities for improved convenience. Table 6.29 of the EIAR outlines a summary of the changes to the bus stop infrastructure along Section 2 of the Proposed Scheme.
- 8.427. It is proposed that all bus stops will be provided inline within dedicated bus lanes along the entirety of the corridor, meaning that buses will not incur delay when setting off after picking up passengers. Improvements in the provision of real-time information, shelters, seating and accessible kerbs at the bus stops throughout Section 2 of the Proposed Scheme are assessed as providing an overall positive impact for bus passengers.
- 8.428. There is currently a total of 26 bus stops along Section 3, 13 inbound and 13 outbound. Under the Proposed Scheme, there will be a total of 22 bus stops along Section 3 with two fewer inbound, and two fewer outbound stops that at present. The layout of new bus stops is considered to better serve the existing and future catchment and be closer to existing and new pedestrian crossing facilities for improved convenience. Table 6.34 of the EIAR outlines a summary of the improvements to the bus stop infrastructure along Section 3 of the Proposed Scheme.
- 8.429. There is currently a total of 24 bus stops along Section 4, 12 inbound and 11 outbound stops. Under the Proposed Scheme, there will be a total of 22 bus stops along Section 4 with two less. Table 6.39 outlines a summary of the improvements to the bus stop infrastructure along Section 4 of the Proposed Scheme. All stops along this section will be inline, within dedicated bus lanes along the entirety of the corridor. Improvements in the provision of real-time information, shelters, seating and accessible kerbs at the bus stops throughout Section 4 of the Proposed Scheme are assessed as providing an overall positive impact for bus passengers.
- 8.430. The layout of new bus stops is considered to better serve the existing and future catchment and be closer to existing and new pedestrian crossing facilities for improved convenience. The magnitude of effects arising from the operation of the proposed new bus stops is expected to be positive and very significant.
- 8.431. Similar to the foregoing infrastructure, issues have been raised in relation to the relocation of some bus stops, the accessibility of bus stops for people with disabilities

and the visually impaired and the provision of shelters. See assessment section above for detailed assessment of bus stops, junction design, pedestrian footpaths and public realm.

8.432. Based on the information submitted and the NTA responses to the concerns raised as outlined within the assessment section of this report, I am satisfied that the applicant has adequately justified the proposed alterations to bus stops. I also note that all bus stops will have accessible kerbs and real time information and the majority will also have shelters which is currently not the case at all stops. Overall, the accessibility and reliability of the bus service will be significantly improved to that currently available. Such improvements will have a positive and long-term impact for patrons and will not result in any significant negative effects.

Parking

8.433. There is no existing parking along Section 1 of the scheme and hence there is no significance of effect.

8.434. Along Section 2 of the proposed scheme it is proposed to remove seven pay and display and permit spaces out of 14 on the R114 Rathfarnham Road between Cormac Terrace and Terenure Road East to provide a cycle lane for northbound traffic.

Magnitude of Impact: Negligible and Long-term effect.

8.435. Along Section 3 the main changes are as follows:

- Currently there are six pay and display and permit spaces on Terenure Road North between West Hampton Place and Ashdale Road. It is proposed that two of these will be removed due to the presence of a cycle lane.

Magnitude of Impact: Negligible and Long-term effect.

- There are five pay and display parking spaces and four taxi rank spaces on Terenure Road North between Rathmore Villas and Eagle Hill Avenue. It is proposed that all five of the pay and display parking spaces are removed due to the presence of a bus stop and cycle lane.

Magnitude of Impact: Negligible and Long-term effect.

- Fifteen pay and display and permit spaces on Harold's Cross Road between Ashdale Road and Mount Tallant will be lost due to the presence of a cycle lane.

Magnitude of Impact: Negative, Slight and Long-Term effect.

- Three pay and display spaces and one loading bay space (three vehicles) will be removed on Rathgar Road, at Highfield Road.

Magnitude of Impact: Negligible and Long-term effect.

8.436. Along Section 4 of the proposed scheme the main changes are as follows:

- Increase from four loading bays (14 spaces) to six loading bays (20 parking spaces) on Rathmines Road Lower, between Rathmines Road Upper and Grove Road.

Magnitude of Impact: Positive, Slight and Long-Term effect.

- Removal of four spaces on Military Road, out of 21 residential pay and display spaces.

Magnitude of Impact: Negligible and Long-term effect.

- The reduction from 20 commercial pay and display spaces to 13 on Camden Street Lower due to the presence of a cycle lane.

Magnitude of Impact: Negative, slight and Long-term effect.

- The removal of nine commercial pay and display spaces on Wexford Street. Loading bay parking spaces will be reduced from five to two one loading bay).

Magnitude of Impact: Negative, slight and Long-term effect.

- There are currently three loading bays (8 spaces) existing on Aungier Street. This is going to be reduced to two loading bays (five spaces).

Magnitude of Impact: Negative, slight and Long-term effect.

- On South Great George's Street, there are currently four loading bays (11 spaces), in the proposed scheme this will be reduced down to three loading bays (8 spaces).

Magnitude of Impact: Negative, slight and Long-term effect.

8.437. As shown in Table 6.36 of the EIAR, there are approximately 76 current parking spaces affected within Section 3 of the Proposed Scheme. Under the proposals, 32 parking spaces will be lost, mainly commercial parking spaces.

8.438. As shown in Table 6.41 of the EIAR, there are currently approximately 122 parking spaces affected along Section 4 of the Proposed Scheme and it is proposed that 20 of these spaces are removed. The Proposed Scheme will formalise the parking arrangements at these locations to improve the environment, particularly for pedestrians and cyclists. Given the local number of parking spaces being removed and availability of equivalent types of parking along adjacent streets within 200m of these locations (and typically within under 100m), the overall impact of this loss of parking is considered to have a Negative, Slight and Long-term effect.

8.439. Overall, there will be a total loss of 54 parking spaces and 5 loading bay spaces along the Proposed Scheme. Given the availability of equivalent types of parking along adjacent streets within 200m of these locations (and typically within under 100m), the overall impact of this loss of parking is considered acceptable. Cognisance being had to the location of the proposed development within an urban highly accessible area and that spaces are to be lost to facilitate enhanced walking, cycling and bus infrastructure, I am satisfied that the loss of spaces is justified. I am also satisfied that no significant effects arise in this regard.

Summary of infrastructure to be provided.

8.440. I draw the Board's attention to section 6.4.6.1.6 of the EIAR which provides a summary of Corridor-Wide Infrastructure Works. In short, the proposed scheme will provide an additional 25% inbound and 28% outbound footway area, Increase pedestrian crossings from 76 to 106. Increase table crossings from 30 to 105.

8.441. It will also provide 9.6km inbound and 10.3km outbound of segregated cycle facilities. Total cycle facilities (segregated and non-segregated) will be increased by 112%. The proportion of the corridor with segregated facilities (including quiet street treatment) will increase from 28% to 85.4%. With regards to cycle parking, the proposed scheme will increase provision by 49% from 220 spaces to a total of 328 spaces across the entire corridor.

- 8.442. With regard to buses, the proposed scheme will provide an increase of 175% in total of bus priority measures in both directions. It will provide bus priority measures along 87% of the corridor.
- 8.443. While parking will reduce by 54 spaces and 5 loading bays, the majority of these are commercial spaces and have a range of alternative parking spaces within a 200m vicinity/ on side streets.
- 8.444. In terms of the modelled benefits of the proposed scheme, I draw the Board's attention to section 6.4.6.1.7 of the EIAR in which the movement of people is assessed. Modelling examines the potential for modal shift in the years 2028 and 2043 in relation to the am and pm peak times. The most significant shift is seen in the increase in people walking and cycling. In the year 2028 during the am peak it is predicted that walking and cycling will see an increase of 79%. Private car use for the same year is predicted to decrease by 30% and an increase of 123% is forecast in the number of people travelling via bus. The PM peak for the same year is predicted to have a similar modal shift with a reduction of 39% in the number of people travelling via car, an increase of 145% in the number of people travelling via bus and an increase in 91% in the number of people walking or cycling.
- 8.445. Modelled modal shifts for the year 2043 also see a significant increase in people walking and cycling with a 48% increase in people moved as a result of the Proposed Scheme and 67% increase in people moved by sustainable modes (Public Transport, Walk, Cycle) in the am peak hour. There is a decrease of 38% in the number of people travelling via car, an increase of 66% in the number of people travelling via bus and an increase of 133% in the number of people walking and cycling along the Proposed Scheme during the PM Peak Hour. The results indicate 55% increase in people moved as a result of the Proposed Scheme and 81% increase in people moved by sustainable modes (Public Transport, Walk, Cycle) in the pm peak hour.
- 8.446. The overall magnitude of the forgoing modelled changes has been adjudged to deliver a **positive, very significant and long-term effect** in terms of People Movement by sustainable modes. It is clear from the information provided that the proposed development will be a significant piece of infrastructure that will assist in the reduction of GHG in Dublin City and will have a significantly positive impact on the sustainability of the city.

8.447. It is clear that the improvements proposed will create the conditions for a modal shift to more sustainable modes of travel. Improved bus times and scheduling, travel information and accessibility to the bus infrastructure are positive changes that are supported at both a national and local level in terms of policy.

8.448. It must be clarified that the initial modelling for the years 2028 and 2043 were based on current metrics for population, traffic levels etc. I note that the applicant has resilience tested the proposed scheme in relation to population and traffic growth. The results of which demonstrate that the proposed scheme will have adequate capacity to cope with such changes without impacting the reliability of the service.

General traffic impacts

8.449. Given the improvements to bus priority, walking and cycling as a result of the Proposed Scheme, there will likely be an overall reduction in operational capacity for general traffic along the direct study area. This may in turn result in some level of redistribution of general traffic away from the main corridor onto the surrounding road network. The surrounding road network including junctions has therefore been examined in detail within the EIAR submitted and has been carried out in accordance with TII's Traffic and Transport Assessment Guidelines.

8.450. I highlight that there is a moderate to significant reduction of between -107 and -586 general traffic flows along the direct study area during the AM Peak Hour, which is attributed to the Proposed Scheme and the associated modal shift as a result of its implementation. This reduction in general traffic flow has been determined as an overall **Positive, Moderate and Long-term effect** on the direct study area. The most significant effect occurs along the Terenure Place which is part of Section 1 of the Proposed Scheme.

8.451. The road links which experience additional traffic volumes / an increase of over 100 combined general traffic flows are set out in Table 6.61 of the EIAR and Road Links where the 100 Flow Additional Traffic Threshold is Exceeded (AM Peak Hour) (Indirect Study Area) is set out in Table 6.63 of the EIAR.

8.452. As outlined in Table 6.63 the additional traffic on the key road links within the indirect study area varies between 100 and 400 combined flows during the AM Peak Hour. Further junction capacity assessment has been undertaken along these road links to

determine whether the above road links have the capacity to cater for the additional traffic volumes as a result of the Proposed Scheme.

8.453. The road links which experience a reduction of ≥ 100 Combined Flows during PM Peak Hour (Direct Study Area) are set out in Table 6.64 of the EIAR and Road Links that Experience an Increase of ≥ 100 Combined Flows during PM Peak Hour (Direct Study Area) is set out in Table 6.65 of the EIAR.

8.454. The results of the junction analysis illustrated in Table 6.70 of the EIAR demonstrates that of the total of 133 junctions assessed, 108 junctions are operating with a maximum V / C ratio of below 85% in the Do Something scenarios in the AM Peak Hour in the 2028 Opening Year. A further 19 junctions are operating with a maximum V / C ratio of between 85% - 100%. Therefore, the majority of junctions continue to operate well within capacity with the Proposed Scheme in place.

8.455. Overall, the Proposed Scheme is considered to have a **Not Significant or Imperceptible and Long-term effect** at 128 junctions within the indirect study area. Three of the 133 junctions assessed are shown to have a significance of effect of **Negative, Slight and Long-term**, and two are shown to have **Negative, Moderate and Long-term effect**.

8.456. Capacity issues are noted at the following six junctions:

- Churchtown Road Lower / Milltown Road – operates above 100% during both the Do Minimum and Do Something scenarios;
- M50 Jct 09 – The Turnpike Road arm operates above 100% during both the Do Minimum and Do Something scenarios;
- Katherine Tynan Road / Sylvan Drive – operates above 100% during both the Do Minimum and Do Something scenarios;
- St Agnes Road / Cromwellsfort Road / Kimmage Road West / Whitehall Road West – operates above 100% during both the Do Minimum and Do Something scenarios;
- Walkinstown Rbt (Cromwellsfort Road approach) – operates between 85% – 100% during the Do Minimum and above 100% during the Do Something scenario; and

- Ballymount Avenue / Ballymount Road Lower – operates above 100% during both the Do Minimum and Do Something scenarios.

8.457. In situations where the ‘do minimum’ result is the same as the ‘do something’ result impacts are considered to be negligible and no further analysis is carried out. At the remaining junction (Cromwellsfort Road approach to the Walkinstown Roundabout), the significance of effect is deemed to be Moderate when combining the road sensitivity and magnitude of impact, therefore, it is considered that no mitigation is required. Closer inspection of the V / C ratio at this junction shows that the Do Minimum ratio is 99% increasing to 104% in the Do Something, which is a limited change in capacity as a result of the Proposed Scheme. The sensitivity of these road links is deemed to be ‘low’, therefore, the **significance of effect is Negative, Moderate and Long-term.**

8.458. The results of the junction analysis illustrated in Table 6.71 of the EIAR that, of a total of 112 junctions assessed, 89 junctions are operating with a maximum V / C ratio of below 85% in the Do Something scenarios in the PM Peak Hour in the 2028 Opening Year. A further 17 junctions are operating with a maximum V / C ratio of between 85% - 100%. Therefore, the majority of junctions continue to operate well within capacity with the Proposed Scheme in place.

8.459. The EIAR highlights that, as a result of redistributed general traffic associated with the Proposed Scheme, the effect at 106 out of 112 junctions assessed is predicted to be **Not Significant and Long-term and Imperceptible and Long-term** within the Indirect Study Area. Five of the 112 junctions assessed are shown to have a significance of effect of **Negative, Slight and Long-term**, and one is shown to have a **Negative, Moderate and Long-term effect** in the 2028 Opening Year PM Peak Hour.

8.460. Capacity issues arise at the following six junctions:

- Ailesbury Rd / Anglesea Rd Jct – operates above 100% during both the Do Minimum and Do Something scenarios;
- Clanbrassil Street Lower / South Circular Road – operates above 100% during both the Do Minimum and Do Something scenarios;
- Greenhills Road / Castletymon Road – operates above 100% during both the Do Minimum and Do Something scenarios;

- M50 Jct 12 (SB Off-slip) – operates above 100% during both the Do Minimum and Do Something scenarios;
- Churchtown Road Lower / Milltown Road – operates above 100% during both the Do Minimum and Do Something scenarios; and
- Scholarstown Rd Rbt – operates above 100% during both the Do Minimum and Do Something scenarios.

8.461. It is contended that the results demonstrate that all these junctions operate with a V / C ratio of above 100% in the Do Minimum scenario, therefore, the impact of Proposed Scheme is low or negligible and no further analysis or mitigation is required.

8.462. With regard to 2043 Design Year – Indirect Study Area – PM Peak Hour, I note that the results of the junction analysis illustrated in Table 6.73 of the EIAR, demonstrate that, of a total of 112 junctions assessed, 97 junctions are operating with a maximum V / C ratio of below 85% in the Do Something scenarios in the PM Peak Hour in the 2043 Design Year. A further nine junctions are operating with a maximum V / C ratio of between 85% - 100%. Therefore, the majority of junctions continue to operate well within capacity with the Proposed Scheme in place.

8.463. Overall, as a result of redistributed general traffic associated with the Proposed Scheme, the effect at 108 out of 112 junctions assessed is predicted to be Not Significant or Imperceptible and Long-term within the Indirect Study Area. Two of the 112 junctions assessed are shown to have a significance of effect of Negative, Slight and Long-term in the 2043 Design Year PM Peak Hour. In the 2043 PM Peak Hour, capacity issues arise at five junctions, all of these junctions operate with a maximum V / C ratio of above 100% in both the Do Minimum and Do Something scenarios and the significance of effect is considered to be Imperceptible or Not Significant.

8.464. Overall, it has been determined in the submitted analysis that the potential impact of the reduction in general traffic flows along the Proposed Scheme will be **Positive, Moderate and Long-term** whilst the potential impact of the redistributed general traffic along the surrounding road network will be **Negative, Slight and Long-term**. It should be noted that effects will be short-lived and localised. I highlight that Section 5.4.2 of DMURS (2019) recognises that a certain level of traffic congestion is an inevitable feature within urban networks and that junctions may have to operate at saturation levels for short periods of time during the peak hours of the day. Chapter 1 of the

Smarter Travel Policy Document also acknowledges that it is not feasible or sustainable to accommodate continued demand for car use. It should therefore be considered that the traffic congestion that is outlined in the impact assessment is acceptable with regard to the urban location of the area. Given that the redistributed traffic is not predicted to lead to a significant deterioration of the operational capacity on the surrounding road network, no further mitigation measures have been considered to alleviate the impact outside of the direct study area.

Mitigation

- 8.465. Construction related mitigation will be included within the CEMP. Implementation of the CEMP will ensure disruption and nuisance are kept to a minimum during the Construction Phase. The CEMP has regard to the guidance contained in the TII Guidelines for the Creation, Implementation and Maintenance of an Environmental Operating Plan, and the handbook published by Construction Industry Research and Information Association (CIRIA) in the UK, Environmental Good Practice on Site Guide, 4th Edition (CIRIA 2015).
- 8.466. A detailed Construction Traffic Management Plan will be prepared and included in the CEMP, and subsequently implemented, by the appointed contractor prior to construction, including Temporary Traffic Management arrangements prepared in accordance with Department of Transport's 'Traffic Signs Manual, Chapter 8 Temporary Traffic Measures and Signs for Roadworks'. The CTMP will be consulted upon with the road authority and will include measures to minimise the impacts associated with the Construction Phase upon the peak periods of the day.
- 8.467. No mitigation measures are proposed for the operation of the proposed scheme. Residual impacts remain as stated above and will not be significant.
- 8.468. I considered all of the written submissions made in relation to traffic and transport, and the relevant contents of the file including the EIAR. I am satisfied that the potential for impacts on traffic and transport can be avoided, managed and/or mitigated by measures that form part of the proposed scheme, by the proposed mitigation measures and with suitable conditions. I am therefore satisfied that the potential for direct or indirect impacts on traffic and transport can be ruled out. I am also satisfied

that cumulative effects, in the context of existing and permitted development in the surrounding area and other existing and proposed development in the vicinity of the site, are not likely to arise.

Table 17 Traffic & Transport – Summary of potential and residual effects.

Potential impacts	Magnitude of Impact	Mitigation	Residual Impact
Construction phase impacts Road network operation	Negative, Slight to Moderate and Temporary	Traffic management Plans	Negative, Slight and Temporary / Negative, Moderate and Temporary
Operational Phase			
Pedestrian Infrastructure	Positive, Significant and Long-term	None	Positive, Significant and Long-term
Cycling Infrastructure	Positive, Significant to Moderate and Long-term	None	Positive, Significant to Moderate and Long-term
Bus Infrastructure	Positive, Moderate, Very Significant and Long-term	None	Positive Moderate to Very Significant and Long-term
Parking and Loading	Negligible and Long-term effect / Negative, Slight and Long-term	none	Negligible and Long-term effect / Negative, Slight and Long-term
People Movement	Positive, Very Significant and Long-term	None	Positive, Very Significant and Long-term

Bus Network Performance Indicators	Positive, Very Significant and Long-term	None	Positive, Very Significant and Long-term
General Traffic Network Performance Indicators	Positive, Moderate and Long-term effect and Negative, Slight and Long-term effect.	None	Positive, Moderate and Long-term effect whilst the impact of the redistributed general traffic along the surrounding road network will have a Negative, Slight and Long-term effect.

Material Assets & Waste

8.499. Chapters 18 & 19 of the EIAR examines the potential for impacts to arise in relation to waste and material assets. The study area regarding major infrastructure and utilities comprises all areas within the Proposed Scheme, including both permanent and temporary land take boundaries. The study area for waste has been carried out on a regional basis and encompasses Dublin and the Eastern-Midlands.

Material Assets

8.500. All major infrastructure and utilities which may be impacted by the Proposed Scheme have been assessed including:

- Major Infrastructure
- Electricity
- Water
- Wastewater & Surface Water Drainage
- Gas and
- Telecommunications

8.501. The applicant has identified several utilities in place along and crossing the Proposed Scheme roads, the majority of which are buried within and along the roadways. These utilities include:

- ESB electricity lines (high, medium, and low voltage) and associated infrastructure;
- Gas Networks Ireland gas mains (high, medium, and low pressure) and associated infrastructure;
- Irish Water potable water mains and associated infrastructure;
- Irish Water sewer lines (foul and combined sewers) and associated infrastructure;
- Local Authority surface water drainage network and associated infrastructure;
- Eir, Enet and Virgin Media telecommunications lines and associated infrastructure;
- Local Authority traffic signal ducting; and

8.502. It is important to note at the outset that significant effects are not likely to arise in relation to the proposed development during either the construction phase or operational phase of the development.

8.503. Impacts on existing infrastructure and utilities may occur in order to accommodate changes to junction layouts or changes to carriageway widths. Where protection of utilities in place is not an option, this will involve realignment, upgrade, or replacement of this infrastructure as part of works within those areas.

8.504. I note from the information submitted that the proposed development would require the diversion of medium and low voltage underground and overhead lines, watermains, gas mains and telecommunication ducts and chambers. These diversions will result in temporary and short-term interruptions to services in the vicinity of the proposed works.

8.505. The magnitude of effects arising from infrastructure diversions ranges between **No Significant Impact to Negative, Imperceptible, Neutral, Long-Term, Long-Term to Neutral, Long Term**. Impacts relating to each individual infrastructure element is outlined in Table 19.12 of the EIAR submitted. Impacts arising to such infrastructure during the operational phase of the development relate to the use of electricity to power new traffic lights and street lighting. Overall effects are expected to be Negative, Imperceptible and Long-Term in this regard.

8.506. In considering the impacts to material assets, I note that the applicant has also considered the impact of the development on imported materials, such as concrete and aggregate. No significant effects are expected in relation to imported materials during either phase of the development.

Waste

8.507. Construction waste, including demolition and excavation waste, will be the main type of waste generated as a result of the Proposed Scheme. Waste licenced facilities within the area have been identified and will be used according to the waste management plan which will be submitted to the relevant Council.

8.508. It is important to note at the outset that impacts arising from waste are not deemed to be significant.

8.509. It is the intention of the applicant to monitor, manage, reduce and reuse waste where possible. Waste will be appropriately segregated. It is anticipated that up to 29,700 tonnes of recycled or reused material could be incorporated into the Proposed Scheme. All monitoring and auditing of waste will form part of the mitigation measures to reduce waste arising from the development in compliance with Article 27 of the Waste Directive Regulations.

8.510. Where practicable and appropriate, and if in reusable condition, materials to be reused include street and roadside infrastructure such as bus stops, lighting poles, traffic signals, manhole access covers and signs.

8.511. I have examined the waste estimates provided by the applicant and note the following in relation to construction waste:

- Estimates of demolition waste types and quantities are outlined in Table 18.8 of the EIAR and result in a total predicted amount of 3,220 tonnes which equates to 0.03% of the demolition waste in the Eastern Midlands Waste Region. The magnitude of effects relating to demolition waste when considered in the context of the region are stated to be **adverse, not significant and short-term.**
- Excavation waste is outlined in table 18.9 of the EIAR and a total of 66,000 tonnes is expected to be generated from the development which equates to 0.56% of the demolition waste in the Eastern Midlands Waste Region. The

magnitude of effects when taken in the context of the region is stated as being **adverse, slight and short-term.**

- Waste also relates to waste construction materials which has been quantified by the applicant within Table 18.10, whereby it is expected that 5-15% of materials used will be wasted. Such levels of waste are standard in construction and as such are not expected to give rise to significant impacts in the regional context. The Construction Phase of the Proposed Scheme is not predicted to give rise to significant impacts and all the impacts will be **adverse, Imperceptible and short-term.**

8.512. Operational waste may arise as a result of carriageway maintenance which will be undertaken at regular intervals, or as necessary. This will primarily consist of bituminous mixtures due to maintenance of carriageway pavement. It is envisaged that bituminous mixtures will be reused within new carriageway construction as far as practicable and in accordance with all applicable legislation. The quantity of bitumen-containing material generated over the assumed lifetime of the Proposed Scheme (60 years), will increase, compared to the Do Nothing scenario, by approximately 8,500 tonnes due to an overall widening of the carriageway. Therefore, there will be an increase in maintenance needs during operation of the Proposed Scheme, in comparison to required maintenance of the existing carriageway under the Do Nothing scenario. Therefore, the potential impact of operational construction and demolition waste will be **adverse, not significant and long-term.**

8.513. Given the limited percentage of waste to be generated from the site it is reasonable to state that cumulative effects arising from development along the route will not arise in this instance.

Conclusion

8.514. I considered all of the written submissions made in relation to Waste & Material Assets and the relevant contents of the file including the EIAR. I am satisfied that the potential for impacts on Waste & Material Assets can be avoided, managed and/or mitigated by measures that form part of the proposed scheme, by the proposed mitigation measures and with suitable conditions. I am therefore satisfied that the potential for direct or indirect impacts on Waste & Material Assets can be ruled out. I am also satisfied that cumulative effects, in the context of existing and permitted development

in the surrounding area and other existing and proposed development in the vicinity of the site, are not likely to arise.

Table 18 Material Assets & Waste – Summary of potential and residual effects

Potential impacts	Magnitude of Impact	Mitigation	Residual Impact
Construction Phase			
Demolition waste	Adverse, Not Significant and Short-Term	Monitoring, auditing and reusing waste	Adverse, Not Significant and Short-Term
Excavation waste	Adverse, Slight and Short-Term	As above	Adverse, Slight and Short-Term
Construction waste	Adverse, Imperceptible and Short-Term	As above	Adverse, Imperceptible and Short-Term
Municipal waste	Adverse, Imperceptible and Short-Term	As above	Adverse, Imperceptible and Short-Term
<ul style="list-style-type: none"> • Electricity • Water / Wastewater • Surface Water Drainage • Gas • Telecommunications 	Range between - No significant impact, Negative, Moderate, Temporary to Negative Slight to Short-Term	Notification and liaison with utility providers.	Range between - No significant impact - Negative, Moderate, Temporary No significant impact to Negative, Slight to Moderate, and Short-Term
Operational Phase			
C& D Waste	Adverse, Not Significant and Long-Term	Reuse waste	Adverse, Not Significant and Long term

Municipal Waste	Neutral and Long-Term	Monitoring, auditing and reusing waste	Neutral and Long-Term
<ul style="list-style-type: none"> • Electricity • Water / Wastewater • Surface Water Drainage • Gas • Telecommunications 	Ranges between: No significant impact & Negative, Imperceptible, and Long-Term	Notification and liaison with utility providers.	Ranges between: No significant impact to Negative, Imperceptible, Moderate, and Temporary

Risk of major accidents and / or disaster

8.515. An assessment of the risk of major accidents or disasters is outlined in chapter 20 of the EIAR. In terms of potential risks, it is of note that the proposed development gives rise to a neutral risk in relation to major accidents or disasters and will therefore not be considered further.

8.515.1. The applicant has identified potential impact of major accidents and/ or disasters from the Proposed Scheme during the construction phase. These include:

- Risk of gas explosion due to the strike of a gas mains during excavation works.
- Risk of structural damage / collapse of structures during construction.
- Contamination Event – Pollution event leading to environmental damage to watercourses or groundwater, particularly associated with the potential release of silt to the aquatic environment.
- Transport Incident - Major road traffic accident resulting from a collision between construction traffic and public traffic i.e. cars, buses, Heavy Goods Vehicles (HGVs), in addition to pedestrians and cyclists using the road or footpaths.
- Risk of spread of invasive species during construction works, particularly during site clearance works and
- Disruption to emergency response vehicles (fire, ambulance and Garda).

8.515.2. The design of the Proposed Scheme has been developed in compliance with the relevant design standards which include provisions to reduce the likelihood of risk events occurring (e.g., structures have been designed to avoid the risk of collapse, drainage systems have been designed to cater for increased rainfall events, etc.). A CEMP has been prepared and is included as Appendix A5.1 in Volume 4 of the EIAR.

Conclusion

I have considered all of the written submissions made in relation to Major Accidents or Disasters and the relevant contents of the file including the EIAR. I am satisfied that the potential for impacts from Major Accidents or Disasters can be avoided, managed and/ or mitigated by measures that form part of the Proposed Scheme, by the proposed mitigation measures and with suitable conditions. I am therefore satisfied that the potential for direct or indirect impacts from Major Accidents or Disasters can be ruled out. I am also satisfied that cumulative effects, in the context of existing and permitted development in the surrounding area and other existing and proposed development in the vicinity of the site, are not likely to arise.

Table 19 Risk of Major Accidents or Disasters – Summary of potential and residual effects.

Potential impacts during Construction Phase	Pre-Mitigation Risk	Mitigation	Post Mitigation Consequence & Risk
Risk of gas explosion.	Medium	See Section 9.5 and Ap. A5.1 CEMP)	Serious & Low
Risk of collapse / structural damage	Medium	As above	Serious & Low
Pollution event leading to environmental damage to watercourses or groundwater.	Medium	As above	Limited & Low
Transport Accident - Major road traffic accident resulting from a collision between construction traffic and public traffic i.e. cars,	Medium	As Above	Serious & Low

buses, Heavy Goods Vehicles (HGVs), in addition to pedestrians and cyclists using the road or footpaths.			
Biosecurity - Risk of spread of invasive species during construction works, particularly during site clearance works	Medium	As Above	Serious & Low
Disruption to emergency response vehicles (fire, ambulance and police)	Medium	As Above	Serious & Low
Risk of spread of invasive species.	Medium	As above	Serious & Low

Interactions between the Factors and Cumulative Impacts

8.516. Chapter 21 of the EIAR considers the potential for cumulative impacts to arise and the potential for interactions between factors to occur. Cumulative impacts are considered in the context of other permitted and planned development in the area as well as the remaining 11 other bus connects routes in the context of the foregoing sections of the EIAR. Development considered in the context of cumulative development include but are not limited to the following:

- SDCC planning reference SD178/0003: Dodder Greenway Route Scheme.
- DCC planning reference 2409/19: 3 no. storey 7 no. bay hipped roof terrace block to comprise of 4 no. three-bedroom townhouses, 3 no. two-bedroom apartments and 5 no. one-bedroom apartments.
- DCC planning reference 2878/15: demolition of existing dwelling at No. 85 Templeogue Road, Dublin 6W and the construction of a total of 30 no. residential units.

- DCC planning reference 2479/20: 24 build to rent residential units located at car park level 3 to car park level 4 level on the Jervis Street and Abbey Street Upper frontages of the building.
- DCC planning reference 4735/18: construction of an infill residential development of 34 no. apartments in two blocks.
- SDCC planning reference SD21A/0101: Residential development comprising a total of 28 apartments, in a building up to 4-storeys on Nutgrove Avenue.
- SDCC planning reference SD22A/0039: construction of 22 4 bed, 3-4 storey units.
- DCC planning reference 3971/22: construction of a four-storey building providing a 120 no. bed space nursing home and all associated ancillary development at former Highfield Plant Nursery.
- DCC planning reference 4027/22: construction of an office development comprising two buildings of office space over five, six and eight floors in Block A and office space over five floors in Block B.
- DCC planning reference 4816/22: construction of an 8 storey office building and café/restaurant.
- SDCC planning reference SD228/0008: construction of a combination of single way and two-way cycle tracks on and adjacent to the vehicle carriageway.
- Irish Water Project - Clarendon Street. Clarendon Street Sewer Upgrades.
- Major Project (id MP15) - DART+ Tunnel Element (Kildare Line to Northern Line).
- Major Project (id MP16) - Potential Metro South alignment: SW option.
- Major Project (id MP17) - LUAS Cross City incorporating LUAS Green Line Capacity Enhancement - Phase 1.
- Major Project (id MP19) - Potential Metro South alignment: Charlemont to Sandyford.
- Major Project (id MP32) - MetroLink.
- SDCC planning reference SD178/0003: Dodder Greenway Route Scheme.

- Major Project (id MP15) - DART+ Tunnel Element (Kildare Line to Northern Line).
- Major Project (id MP16) - Potential Metro South alignment: SW option.
- Major project (id MP34) - Greater Dublin Area Cycle Network Plan.
- Kimmage to City Centre Core Bus Corridor scheme.

8.517. The applicant has also had regard to the relevant plans for the area and I am satisfied that a robust and detailed assessment of the potential for cumulative impacts to arise has been carried out.

8.518. It is important to note at the outset that for the large part no significant cumulative impacts are expected.

Water, soils, geology and hydrogeology

8.519. Water, soils, geology and hydrogeology are examined as a group of receptors for the purpose of the consideration of cumulative effects. Standard mitigation measures as outlined within the relevant sections above will avoid significant impacts from arising in relation to such factors and therefore no significant effects are expected. Similarly, mitigation measures to avoid such impacts also form part of the permitted schemes and I am therefore satisfied that significant cumulative impacts will not arise in this regard.

Traffic

8.520. In the consideration of cumulative traffic impacts the applicant in the first instance considered the cumulative impact of all 12 schemes and modelling exercise of a worst-case scenario was carried out. The results would give rise to significant traffic displacement across the Dublin area with significant impacts occurring on local residential roads as the carrying capacity of arterial routes is designed to cater for such volumes in traffic.

8.521. In order to prevent such significant impacts from arising the applicant has stated that a number of routes will not be constructed simultaneously. It is proposed to limit the number of Core Bus Corridor schemes which would be under construction concurrently as part of the proposed realistic worst-case scenario to manage overall construction impacts across the city region. The following schemes will not, therefore,

be constructed concurrently with adjacent schemes to limit potential for significant adverse traffic, air quality and noise issues during the construction stage:

- The Proposed Scheme
- Ballymun / - Finglas to City Centre Core Bus Corridor Scheme
- Lucan to City Centre Core Bus Corridor Scheme; and
- Bray to City Centre Core Bus Corridor Scheme.

8.522. The remaining eight schemes, can be constructed concurrently or with a combination of other schemes incorporating the limitations. The proposed scheme will retain two-way traffic along the route for the duration of construction and will therefore maintain traffic flows. It is for this reason that significant cumulative traffic impacts are not expected. Similarly significant cumulative traffic impacts do not arise in relation to other developments in the area of the proposed scheme or in relation to the operation of the scheme.

Dust, Air Pollution & Climate

8.523. An appraisal has been carried out to assess the cumulative risk to sensitive receptors as a result of dust soiling and the health impacts and ecology impacts due to the construction phase of the Proposed Scheme. Other projects within 350 metres of the proposed scheme, as outlined above were considered in this regard. Mitigation measures to prevent dust are to be implemented as outlined within the relevant section above and as such no significant dust impacts are expected to arise in relation to the proposed scheme. Given that such mitigation is standard practice in relation to construction and excavation works it is reasonable to state that significant cumulative dust emissions are not expected to arise in relation to other development within the area. Such mitigation measures are included within the permitted schemes referred to and I am therefore satisfied given the limited nature of the proposed works and the measures proposed within it to avoid dust emissions, that no significant impacts will arise.

8.524. In terms of pollutants, I note that the applicant has outlined the cumulative construction phase in terms of a percentage of the regional output in Table 21.4 of the EIAR and given the relatively small percentage of pollutants that the scheme will give rise to in this context, no significant cumulative impacts are expected. Construction Phase traffic

emissions from the Proposed Scheme, the other 11 Core Bus Corridor schemes are considered overall **Negative, Not Significant and Short-term**.

8.525. Cumulative impacts in relation to climate are considered within the EIAR within a national context. The impacts to climate have been quantified within the Air Quality and Climate Section of this EIAR above and will not be repeated hereunder, however it is important to note that impacts arising from the operation of the development are positive and the proposal will result in a reduction of carbon emissions over the life of the scheme. As mentioned above construction impacts in terms of climate are considered to be significant this was determined in the absence of ceiling thresholds. This issue has been discussed in detail above and will not be repeated hereunder. However, in the context of the proposed development I acknowledge that the scheme will ultimately have a positive impact on climate I am therefore satisfied that significant long term adverse cumulative impacts will not arise.

Noise & Vibration

8.526. Cumulative impacts in relation to Noise and vibration have been examined in the context of the proposed 12 routes and the other 31 projects listed in Appendix A21.1 Summary of Stages 1 and 2 Shortlisting Outcomes in Volume 4 of the EIAR. Thirty-one projects were identified within the 300m potential Zone of Influence (Zoi) of the Proposed Scheme (Refer to Section 21.2.2.3). These include 24 DCC planning applications, four SDCC planning applications, one SHD, one other Major Project, the Kimmage to City Centre Core Bus Corridor scheme and the Bray to City Centre Core Bus Corridor scheme. Due to the distance between routes cumulative impacts in relation to the other proposed routes are not expected. Such impacts range from Negative, Moderate, Temporary to Negative, Slight - Moderate, Temporary. Other major infrastructure projects could directly interface with the construction of the Proposed Scheme. To prevent such impacts from arising it is proposed to liaise with the contractors of other projects, to ensure that there is coordination between projects and no significant cumulative impacts arise.

Biodiversity

8.527. Cumulative impacts to biodiversity relate to habitat loss, disturbance and loss of foraging and habitat fragmentation. It is important to note given the location of the Proposed Scheme and the on-going urban development trends across Dublin, there is likely to be continued habitat loss and fragmentation in the area. The applicant

however has had regard to the environmental protective policies of the relevant development plan for the scheme and the scheme is compliant with same.

8.527.1. I have already concluded within in-combination assessment carried out under the Appropriate Assessment in Section 7 of this planning report that there is no potential for adverse effects on the integrity of any European sites, to arise as a consequence of the Proposed Scheme in combination with any other plans or projects. I note that impacts on biodiversity will be no higher than the already predicted significant residual effects at the local geographic scale for the Proposed Scheme alone.

8.527.2. Disturbance or displacement impacts to mammals during construction will be temporary or short-term and are not likely to have long-term population level effects, or cumulatively with any future projects that might be proposed.

Archaeology and Built Heritage

8.527.3. I note that archaeological investigations will take place in order to identify any below-ground remains that may be present. This is true of all permitted significant infrastructure in the area and no significant cumulative effect on below-ground remains is anticipated. In terms of built heritage, no significant effects are expected, and mitigation measures will ensure the appropriate protection of features such as such as boundaries, street furniture, paving and surface treatments.

Landscape and Visual

8.528. It is stated within the EIAR that there will be potential for localised significant temporary/ short-term cumulative construction effects for the Proposed Scheme during construction in conjunction with other Major Projects, where concurrent construction of schemes have the potential to overlap. As set out in Section 21.2.6 of the EIAR, there is a likelihood of significant negative traffic related impacts should all 12 Core Bus Corridor schemes be constructed at the same time. The mitigation for this will be to programme the Construction Phases of the Core Bus Corridor schemes (assuming they are consented) so that the four schemes identified in proximity will not be constructed concurrently with adjoining schemes. In this regard, scheme construction programming will be controlled and implemented by the NTA. It is acknowledged that the effects would be reduced or negligible if the construction of these schemes does not overlap.

8.528.1. For the remaining shortlisted projects, should the construction periods either overlap or follow on within a short timeframe with the Proposed Scheme, there is potential for localised, moderate, temporary in-combination indirect townscape/ visual effects to occur. Effects would also be reduced or negligible if the construction of these schemes does not overlap and, in most cases, the potential impacts are likely to be localised and contained, due to enclosing effect of the surrounding built form.

8.528.2. Having regard to the very detailed information provided by the applicant in relation to cumulative effects, I am satisfied that no significant cumulative effects arise in this instance.

Interactions

8.529. I have considered the interrelationships between factors and whether these may as a whole affect the environment, even though the effects may be acceptable when considered on an individual basis.

8.530. I consider that there is potential for population and human health to interact with all of the other factors (biodiversity, water, air and climate, noise, landscape and visual, cultural heritage and material assets – traffic). The details of all other interrelationships are set out in Chapter 21 of the EIAR which I have considered.

8.531. The proposed construction phase of the development has the most potential to interact with human health and biodiversity in relation to water contamination. Spills to waterbodies of hydrocarbons, concrete wash or other chemicals can have a direct effect on human health and biodiversity. It is important to note therefore that residual impacts to water were expected to be imperceptible and as such there is no likely significant interaction between Water and Human Health or Water and Biodiversity from this Proposed Scheme during construction.

8.532. Similarly human health and biodiversity can interact with air quality, noise and vibration and traffic. No significant impacts are expected in this regard and I am satisfied on the basis of the information provided that there is no likely significant interaction between these factors and human health.

8.532.1. I am satisfied that the proposals for the other 11 Core Bus Corridor schemes and the Proposed Scheme are complementary and could have a cumulative beneficial effect by encouraging active travel and increased use of public transport

through offering a choice of routes. Due to the substantial size of overall population with the opportunity to benefit from the proposals, the effect is assessed as Positive, Very Significant and Long-Term for health.

8.533. Interactions between soils and water will arise but as mentioned above due to mitigation will not give rise to significant interaction. Similarly, interactions between water traffic and transport, however, all changes in traffic flows would occur within the same drainage catchments and so there would be no significant impacts from this interaction.

8.534. Interactions also occur between Landscape (Townscape) and Visual, Architectural Heritage, Archaeology and Cultural Heritage. The Construction Phase will have impacts on a number of local features of heritage value, e.g., Protected Structures, Conservation Areas, Historic Mileposts etc. Excavations may interact with archaeology, but this would be restricted to the construction phase of the development. A number of trees and grassland are to be removed as part of the scheme; however, in the main such works will be temporary in that trees will be replanted, and grass areas reseeded. I note in this regard that a strip of Rathfarnham Castle Park is to be removed permanently which is considered to have a Negative, Very Significant and Temporary / Short-Term effect. Having regard to the mitigation measures proposed by the applicant in this regard I am satisfied that significant interactions will not arise.

8.535. Having regard to the foregoing I am satisfied that effects as a result of interactions, indirect and cumulative effects can be avoided, managed and / or mitigated for the most part by the measures which form part of the proposed development, the proposed mitigation measures detailed in the EIAR, and with suitable conditions.

Reasoned Conclusion

8.536. Having regard to the examination of environmental information contained above, to the EIAR and supplementary information provided by the applicant and the submissions from the planning authority's, prescribed bodies, and observers in the course of the application, it is considered that the main significant direct and indirect effects of the proposed development on the environment are, and will be mitigated as follows:

- Negative impacts on **human health and population** arising from construction including noise, traffic and dust disturbance to residents of neighbouring

dwellings are low to moderate. Adequate mitigation measures are proposed to ensure that these impacts are not significant and include adequate mitigation for operational noise.

- Benefits/positive impacts on the **Air and Climate**, the operation of the proposed development will have a significant positive effect on human health and population due to the displacement of CO₂ from the atmosphere arising from an increased use of public transport which will be electrified and the reduction of cars on the route. Negative impacts during construction relate to the embodied carbon of construction materials which will have a negative significant impact but for the short term, any increase in carbon is considered significant, however the construction phase represents a significantly small percentage of the sectoral emission ceilings outlined in CAP 24 for the 2021-2025 carbon budget period, the proposed development represents 0.036% of the transport emission ceiling for the period.
- Negative impacts on **Water** could arise as a result of accidental spillages of chemicals, hydrocarbons or other contaminants entering watercourses, the sea or groundwater via piling activities during the construction phase of the development. These impacts will be mitigated by measures outlined within the application and can therefore be ruled out.
- Negative impacts on **biodiversity** relate to the removal of habitat in the form of trees with roosting potential for bats. Such impacts are not considered significant and can adequately be mitigated for within the scheme. New trees will be planted in the vicinity to bolster existing treelines. Significant impacts are therefore not expected in this regard. The avoidance of trees with roosting potential for bats, the use of Bat boxes and the maintenance of commuting corridors, as well as pre-construction bat surveys will ensure significant impacts to bats are avoided as much as possible. Pre-construction surveys will ensure that no mammals, birds or invasive species are present within the works areas. Adequate mitigation measures are proposed to ensure the protection of such mammals and birds encountered and to prevent the spread of invasive species. Significant impacts to biodiversity can therefore be ruled out.
- **Noise and Dust** impacts arise during the construction phase from construction activities. These impacts will be mitigated through adherence to best practice

construction measures in relation to dust and the use of noise abatement at sensitive locations. Significant noise impacts arise in relation to construction noise during nighttime and weekend hours when thresholds are lower. Works will generally be carried out in daytime hours causing no significant effects. In the event that works are required during nighttime or weekend hours, liaison with residents in this regard and the use of noise abatement will reduce the level of impacts. Noise disturbance from the operation of the development can be ruled out, electric bus fleet and less cars will have a positive impact on operational noise. Significant impacts arising from noise and dust disturbance during the construction, operational and decommissioning stages can therefore be ruled out.

- Negative **traffic** impacts arise during the construction phase of the development, these impacts will be mitigated through the implementation of a traffic management plan and a construction management plan. Whilst some localised impacts arising from road closures may arise, significant impacts arising from traffic can be ruled out.

8.537. The EIAR has considered that the main significant direct and indirect effects of the proposed development on the environment would be primarily mitigated by environmental management measures, as appropriate. Thus, having regard to the foregoing assessment, I am, therefore, satisfied that the proposed development would not have any unacceptable direct or indirect effects on the environment.

8.538. The EIAR has considered that the main significant direct and indirect and cumulative effects of the proposed development on the receiving environment. Following mitigation, no residual significant long-term negative impacts on the environment or sensitive receptors would occur. I am satisfied that the information provided is reasonable and sufficient to allow the Board to reach a reasoned conclusion on the significant effects of the project on the environment, taking into account current knowledge and methods of assessment. Overall, I am satisfied that the information contained in the EIAR complies with the provisions of Article 3, 5 and Annex (IV) of EU Directive 2014/52/EU.

9.0 Recommendation

9.1. I recommend that permission is granted subject to the following conditions.

10.0 Reasons and Considerations

In coming to its decision, the Board had regard to the following:

European legislation, including of particular relevance:

- Directive 92/43/EEC (Habitats Directive) and Directive 79/409/EEC as amended by 2009/147/EC (Birds Directives) which set the requirements for Conservation of Natural Habitats and of Wild Fauna and Flora throughout the European Union.

National and regional planning and related policy, including:

- Climate Action Plan 2024,
- National Development Plan 2021 - 2030,
- Project Ireland 2040 National Planning Framework,
- Greater Dublin Area Transport Strategy 2022-2042,
- Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009 – 2020,
- Department of Transport National Sustainable Mobility Policy, 2022,
- Design Manual for Urban Roads and Streets, 2019,
- Cycle Design Manual (NTA & DoT 2023), and
- Other relevant guidance documents.

Regional and local level policy, including the:

- Regional Spatial Economic Strategy for the Eastern and Midlands Region

The local planning policy including:

- Dublin City Development Plan 2022-2028,
- Dublin City Biodiversity Action Plan 2021-2025,
- South Dublin County Council Development Plan 2022-2028,
- Greater Dublin Area Transport Strategy 2022-2042,

- Other relevant guidance documents,
- the nature, scale and design of the proposed development, as set out in the planning application, and the pattern of development in the vicinity,
- the entirety of the documentation submitted by the National Transport Authority (NTA) (applicant) in support of the proposed development, including the Environmental Impact Assessment Report (EIAR) and the Natura Impact Statement (NIS), and the range of mitigation and monitoring measures proposed,
- the submissions made to An Bord Pleanála in connection with the planning application,
- the likely consequences for the environment and the proper planning and sustainable development of the area in which it is proposed to carry out the proposed development and the likely significant effects of the proposed development on European Sites, and
- the report and recommendation of the Inspector, including the examination, analysis and evaluation undertaken in relation to appropriate assessment (AA) and environmental impact assessment (EIA).

It is considered that the proposed development would accord with European, national, regional and local planning and that it is acceptable in respect of its likely effects on the environment and its likely consequences for the proper planning and sustainable development of the area.

Appropriate Assessment Stage 1:

The Board agreed with and adopted the screening assessment and conclusion carried out in the inspector's report that the North Dublin Bay SAC, South Dublin Bay SAC, Rockabill to Dalkey Island SAC, Howth Head SAC, Wicklow Mountains SAC, Knocksink Wood SAC, Ballyman Glen SAC, Baldoyle Bay SAC, Glenasmole Valley SAC, Rye Water Valley / Carton SAC, Irelands Eye SAC, Malahide Estuary SAC, Lambay Island SAC, South Dublin Bay and River Tolka Estuary SPA, North Bull Island SPA, Dalkey Islands SPA, Wicklow Mountains SPA, Baldoyle Bay SPA, Howth Head Coast SPA, Ireland's Eye SPA, Malahide Estuary SPA, Rogerstown Estuary

SPA, Lambay Island SPA, The Murrough SPA, Skerries Islands SPA, Rockabill SPA and North West Irish Sea cSPA are the European sites for which there is a likelihood of significant effects.

Appropriate Assessment Stage 2:

The Board considered the Natura Impact Statement and all other relevant submissions and carried out an appropriate assessment of the implications of the proposal for the European Sites, in view of the Sites' Conservation Objectives. The Board considered that the information before it was adequate to allow the carrying out of an appropriate assessment.

In completing the assessment, the Board considered, in particular, the likely direct and indirect impacts arising from the proposal both individually or in combination with other plans or projects, specifically upon the European Sites,

- i. Mitigation measures which are included as part of the current proposal,
- ii. Conservation Objectives for these European Sites, and
- iii. Views of prescribed bodies in this regard.

In completing the appropriate assessment, the Board accepted and adopted the appropriate assessment carried out in the Inspector's report in respect of the potential effects of the proposed development on the integrity of the aforementioned European Sites, having regard to the Sites' conservation objectives.

In overall conclusion, the Board was satisfied that the proposed development, by itself or in combination with other plans or projects, would not adversely affect the integrity of the European Sites, in view of the Site's conservation objectives.

Environment Impact Assessment

The Board completed an environmental impact assessment of the proposed development, taking into account:

- the nature, scale, location, and extent of the proposed development.
- the Environmental Impact Assessment Report and associated documentation submitted with the application.
- the submissions received during the course of the application; and

- the Inspector's report.

The Board considered that the Environmental Impact Assessment Report, supported by the documentation submitted by the applicant, adequately considers alternatives to the proposed development and identifies and describes adequately the direct, indirect, secondary and cumulative effects of the proposed development on the environment. The Board agreed with the examination, set out in the Inspector's report, of the information contained in the Environmental Impact Assessment Report and associated documentation submitted by the applicant and submissions made in the course of the planning application.

Reasoned Conclusion for EIA

The Board considered that the Environmental Impact Assessment Report, supported by the documentation submitted by the applicant, provided information which is reasonable and sufficient to allow the Board to reach a reasoned conclusion on the significant effects of the proposed development on the environment, taking into account current knowledge and methods of assessment. The Board is satisfied that the information contained in the Environmental Impact Assessment Report is up to date and complies with the provisions of EU Directive 2014/52/EU amending Directive 2011/92/EU. The Board considered that the main significant direct and indirect effects of the proposed development on the environment are those arising from the impacts listed below.

The main significant effects, both positive and negative, are:

- Negative impacts on **human health and population** arising from construction include noise, traffic and dust disturbance to residents of neighbouring dwellings. All of these impacts are low to moderate. Adequate mitigation measures are proposed to ensure that these impacts are not significant and include adequate mitigation for operational noise.
- Benefits/positive impacts on the **Air and Climate**, the operation of the proposed development will have a significant positive effect on human health and population due to the displacement of CO₂ from the atmosphere arising from an increased use of public transport which will be electrified and the reduction of cars on the route. Negative impacts during construction relate to the embodied carbon of construction materials which will have a negative significant impact

but for the short term, any increase in carbon is considered significant, however the construction phase represents a significantly small percentage of the sectoral emission ceilings outlined in CAP 23 for the 2021-2025 carbon budget period, the proposed development represents 0.036% of the transport emission ceiling for the period.

- Negative impacts on **Water** could arise as a result of accidental spillages of chemicals, hydrocarbons or other contaminants entering watercourses, the sea or groundwater via piling activities during the construction phase of the development. These impacts will be mitigated by measures outlined within the application and can therefore be ruled out.
- Negative impacts on **biodiversity** relate to the removal of habitat in the form of hedgerows and treelines. Such impacts are not considered significant and can adequately be mitigated for within the scheme. Vegetation will be planted in the vicinity to bolster existing treelines and hedgerow. Significant impacts are therefore not expected in this regard. The avoidance of trees with roosting potential for bats, use of bat boxes, and the maintenance of commuting corridors, as well as preconstruction bat surveys will ensure significant impacts to bats are avoided. Preconstruction surveys will ensure that no mammals, birds or invasive species are present within the works areas. Adequate mitigation measures are proposed to ensure the protection of such mammals and birds encountered and to prevent the spread of invasive species. Significant impacts to biodiversity can therefore be ruled out.
- **Noise and Dust** impacts arise during the construction phase from construction activities. These impacts will be mitigated through adherence to best practice construction measures in relation to dust and the use of noise abatement at sensitive locations. Significant noise impacts arise in relation to construction noise during nighttime and weekend hours when thresholds are lower. Works will generally be carried out in daytime hours causing no significant effects. In the event that works are required during nighttime or weekend hours, liaison with residents in this regard and the use of noise abatement will reduce the level of impacts. Noise disturbance from the operation of the development can be ruled out, electric bus fleet and less cars will have a positive impact on operational noise. Significant impacts arising from noise and dust disturbance

during the construction, operational and decommissioning stages can therefore be ruled out.

- Negative **traffic** impacts arise during the construction phase of the development, these impacts will be mitigated through the implementation of a traffic management plan and a construction management plan. Whilst some localised impacts arising from road closures may arise, significant impacts arising from traffic can be ruled out.
- The EIAR has considered that the main significant direct and indirect effects of the proposed development on the environment would be primarily mitigated by environmental management measures, as appropriate.
- The EIAR has considered that the main significant direct and indirect and cumulative effects of the proposed development on the receiving environment. Following mitigation, no residual significant long-term negative impacts on the environment or sensitive receptors would occur.

Having regard to the above, the Board is satisfied that the proposed development would not have any unacceptable direct or indirect effects on the environment. The Board is satisfied that the reasoned conclusion is up to date at the time of making the decision and that the information contained in the EIAR complies with the provisions of Article 3, 5 and Annex (IV) of EU Directive 2014/52/EU.

Proper Planning and Sustainable Development

The proposed road development would deliver a key component of the National Transport Authority's BusConnects programme with the stated aim to improve bus services across the country. It would also provide safer infrastructure for pedestrians and cyclists and would deliver sustainable connectivity and integration with other transport services. The public realm along the bus corridor would also be improved.

The Board considered that the proposed road development, subject to compliance with the conditions set out below, would be in accordance with national, regional and local planning policies, including multiple policies and objectives set out in the Dublin City Development Plan 2022-2028, The South Dublin County Council Development Plan 2022 -2028 and having regard to all relevant provisions, including zoning objectives, at or adjoining the overall scheme area. It is further considered that the

need, justification and purpose of the proposed road development has been adequately demonstrated, that it is acceptable in terms of its likely effects on the environment and that an approval for the proposed road development would be consistent with national climate ambitions and with the relevant provisions of the Climate Action Plan 2024 through the delivery of an efficient, low carbon and climate resilient public transport service, which supports the achievement of Ireland's emission reduction targets. The proposed road development would, therefore, be in accordance with the proper planning and sustainable development of the area.

11.0 Conditions

1. The proposed development shall be carried out and completed in accordance with the plans and particulars lodged with the application, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree

such details in writing with the planning authority prior to commencement of development and the proposed development shall be carried out in accordance with the agreed particulars.

Reason: In the interest of clarity.

2. (a) All mitigation, environmental commitments and monitoring measures identified in the EIAR shall be implemented in full as part of the proposed development.

(b) All mitigation and environmental commitments identified in the Natura Impact Statement shall be implemented in full as part of the proposed development.

Reason: In the interest of development control, public information, and clarity.

3. In accordance with the Environmental Impact Assessment Report, a suitably experienced and qualified ecologist will be appointed by the contractor. The ecologist will advise the contractor on ecological matters during construction, communicate all matters in a timely manner to the developer (National Transport Authority) and statutory authorities as appropriate, acquire any licences/consents required to conduct the work, and supervise and direct the ecological measures associated with the permitted scheme. Where appropriate, monitoring shall be undertaken by specialists. Monitoring schedules shall be included in Site Specific Habitats Protection and Re-instatement Method Statements.

Reason: In the interest of environmental protection.

4. Prior to commencement of development, the developer shall submit for the written agreement of the planning authority an Otter Conservation Plan to include measures to maintain the presence of otter in the vicinity of the proposed development project and particularly preserve routes for the movement of otter, in particular in the River Dodder. The plans shall also set out measures to minimise disturbance to otter breeding and resting places during the projects construction phase and include the provision of artificial otter holts to form new refuges for this species to compensate for the increased human disturbance of otter likely during the developments operational phase, and set out a program for the monitoring by otter specialists of the presence of otter in nearby sections of the River Dodder, during and after the proposed works.

Reason: In the interest of the conservation of the otter, which is subject to a system of strict protection under the Habitats Directive (92/43/EEC) and is a QI species for the Wicklow Mountains SAC.

5. Prior to commencement of development, the developer shall:
 - (A) Acquire in writing Ministerial consent for all works at or in the immediate proximity to Rathfarnham Castle.
 - (B) Agree in writing with the planning authority the details of the type of finishes/ materials for the proposed Rathfarnham Castle wall reinstatement.

Reason: In the interest of visual amenity.

6. Prior to commencement of development, the finalised location and type of cycle parking stands throughout the scheme shall be agreed in writing with the planning authority.

Reason: In the interest of facilitating convenient and adequate bicycle parking.

7. Prior to commencement of development, the developer shall agree in writing with the planning authority details of the precise design and layout of pedestrian crossing facilities over cycle tracks at island bus stops on a case-by-case basis which shall be informed by the Cycle Design Manual (National Transport Authority, September 2023).

Reason: In the interest of pedestrian and cyclist safety.

8. Prior to the commencement of any works associated with the development hereby permitted, the developer shall submit a Construction Traffic Management Plan and a Construction Stage Mobility Management Plan for the construction phase of the development for the written agreement of the planning authority. The Construction Stage Mobility Management Plan shall promote the use of public transport, cycling and walking by personnel accessing and working on the construction site. The agreed Construction Traffic Management Plan and Construction Stage Mobility Management Plan shall be implemented in full during the course of construction of the development.

Reason: In the interest of traffic safety and promoting sustainable travel during the construction period.

9. In accordance with the Environmental Impact Assessment Report, all works to Protected Structures, and Structures of Cultural heritage interest shall be monitored and recorded by an Architectural Conservation Specialist, Re-instatement Method Statements shall be submitted to the planning authority to be held on file. The Architectural Conservation Specialist shall ensure adequate protection of the retained and historic fabric during the proposed works and across all preparatory and construction phases. Any features of new architectural heritage shall be made known to the Conservation Section of the relevant planning authority as soon as is practicably possible.

Reason: In the interest of environmental protection.

10. Noise monitoring shall be carried out during the construction phase of the proposed road development by the developer to ensure that construction noise threshold levels (L_{Aeq} , period) shall not exceed the levels set out in Table 9.7 (Construction Noise Threshold (CNT) levels for the Proposed Scheme) of Chapter 9 (Noise and Vibration) of the Environmental Impact Assessment Report. During the construction phase, noise monitoring shall be carried out at representative noise sensitive locations to be agreed with the planning authority as the work progresses along the scheme to evaluate and inform the requirement and/ or implementation of noise management measures. Noise monitoring shall be conducted in accordance with ISO 1996–1 (ISO 2016) and ISO 1996–2 (ISO 2017).

Reason: In the interest of management of construction noise and protection of adjoining amenities.

11. Drainage arrangements, including the attenuation and disposal of surface water, shall comply with the requirements of the planning authority for such works in respect of both the construction and operation phases of the proposed development.

Reason: In the interests of environmental protection and public health.

12. Any new or improved surface water outfalls shall be constructed in a manner which protects riparian habitat and does not result in excessive erosion of such habitat.

Reason: In the interest of habitat protection.

13. Prior to commencement of development, the developer, and/ or any agent acting on its behalf, shall prepare in consultation with the relevant statutory agencies, an updated Construction Environmental Management Plan (CEMP), incorporating all mitigation measures indicated in the Natura Impact Statement and Environmental Impact Assessment Report and a demonstration of proposals to adhere to best practice and protocols.

The updated CEMP shall also include details of intended construction practice for the development, including hours of working, compound/ works area lighting, noise management measures and surface water management proposals.

The construction of the development shall be constructed in accordance with the updated CEMP.

Reason: In the interests of protecting the environment, the landscape, the integrity of European Sites and sensitive receptors and in the interest of public health.

14. The developer shall monitor queuing time/ delays at each works location and record traffic flows on the local road network at locations to be agreed with the planning authority. Such monitoring information shall be provided in a report to the planning authority on a weekly basis.

Reason: In the interest of orderly development.

15. Prior to the replacement of trees, hedging and planting which is to be removed the National Transport Authority shall liaise with the relevant landowner with regard to the species, size and location of all replacement vegetation. The National Transport Authority shall also employ the services of an appropriately

qualified arboriculturist and Landscape Architect for the full duration of the proposed works to ensure landscaping and tree works are implemented appropriately.

Reason: In the interests of visual and residential amenity.

16. Tree protection measures for all existing trees shall be put in place prior to the commencement of development or phases of development.

Reason: In the interest of the protection of biodiversity.

17. All details of soft landscaping shall be submitted to the planning authority prior to implementation.

Reason: In the interest of orderly development.

18. Comprehensive details of the proposed public lighting system to serve the Proposed Scheme shall be submitted to and agreed in writing with the planning authority, prior to commencement of development.

Reason: In the interests of public safety and visual amenity.

19. The developer shall facilitate the preservation, recording and protection of archaeological materials or features that may exist within the site. In this regard, the developer shall –

- a) employ a suitably qualified archaeologist who shall monitor all site investigations and other excavation works, and
- b) provide arrangements, acceptable to the planning authority, for the recording and for the removal of any archaeological material which the authority considers appropriate to remove. In default of agreement on any of these requirements, the matter shall be referred to An Bord Pleanála for determination.

All archaeological pre-construction investigations shall be carried out in accordance with the details specified within the Environmental Impact Assessment Report submitted with the application.

Reason: In order to conserve the archaeological heritage of the site and to secure the preservation and protection of any remains that may exist within the site.

20. Prior to the commencement of development, the applicant shall submit an Invasive Species Management Plan to the planning authority, which includes details of a pre-construction survey to be carried out. The plan shall include full details of the eradication of such invasive species from the development site prior to construction or if discovered during construction as soon as is practicably possible.

Reason: In the interests of nature conservation and mitigating ecological damage associated with the development.

21. (a) Trees to be felled shall be examined prior to felling and demolition to determine the presence of bat roosts. Any clearance works shall be in accordance with the Transport Infrastructure Ireland Guidelines for the Treatment of Bats During the Construction of National Road Schemes.
- (b) Prior to commencement of development, the developer shall submit for the written agreement of the planning authority the design and location of permanent bat boxes to be installed. These proposals shall include the installation of at least 5 such bat boxes in grounds of Rathfarnham Castle Park along the reinstated boundary wall with Grange Road.
- (c) No ground clearance shall be undertaken and no vegetation shall be cleared from the 1st day of March to 31st day of August, unless otherwise agreed with the planning authority.

Reason: In the interest of protection and enhancing local biodiversity.

22. Scaled elevations of proposed bus shelters to be provided throughout the route shall be submitted for the written agreement of the relevant Planning Authority. Bus shelters within South Great Georges Street Architectural Conservation Area (ACA) and Rathfarnham ACA shall not have advertisement panels included.

Reason: In the interests of proper planning and sustainable development, conservation of the visual amenities and character of the area and preservation of conservation streetscape.

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.

Fiona Fair
Senior Planning Inspector

02.12.2024

Appendix 1

1. Adrian Young and Nicola Byrne – (Woodview Cottages)

- Concern with regard to use of lands for a construction compound TR3, CPO referenced 1004(1).2f - Area Located along Dodder View Road, across the road from Bushy Park, In the greenfield area between Doddar View Road, Woodvlew Cottages and Church Lane.
 - Location is inappropriate directly beside a residential area (within 10m)
 - Its use as the 'primary construction site' for the scheme
 - Located within Rathfarnham ACA
 - Destruction of a green space

- Availability of more suitable alternative sites
- Destruction of the Dodder Greenway for a number of years
- Concern of:
 - Noise and vibrations
 - Environmental and air quality pollution – Inaccurate information in the EIAR
 - Visual aspects
 - Unacceptable hazard – Concern of the type of waste being stored, including hazardous waste, within 10m of residential properties.
 - Drainage (Greater Dublin Drainage Strategy) – Flood Risk
 - Ecological destruction (Impact on Bats)
 - Dodder greenway amenity
 - Undetermined end period to the use of a 'temporary' site and;
 - Unsuitable parking.
 - Proposed hours of construction are unsuitable.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Insufficient response
- Lack of official OH
- No new mitigation measures.
- Use of construction compound TR3 is unsuitable and unnecessary, as raised by residents, Councillors and TD's.
- No new issues raised.

2. Aidan Brennan (Rathmines - Church)

- Concern of impact to vehicular access for elderly and disabled to local parish church i.e. Church of Mary Immaculate Refuge of Sinners in Rathmines.
- Concern of prevention / access for people attending church.

3. Aislinn Collins – (Woodview Cottages)

- Concern with regard to use of lands for a construction compound TR3.

- Proposal for compound is contrary to the land use zoning 'OS' – Open space.
- Concern of damage of amenity value of the green space.
- Concern of potential flooding.
- Concern of impact upon archaeological heritage and architectural heritage.
- Concern of impact upon residential amenity (dust, noise, construction traffic, hours of operation).

4. Alan Murphy (Rathfarnham Castle Park)

- Concern of irreparable harm to woodland as a biodiversity wildlife habitat.
- Excessive land take of 'up to 10m' of woodland area for road widening purposes.
- The road is of sufficient size to accommodate inbound bus lane, two general traffic lanes and pedestrians and cyclists.
- Outbound buses can be prioritised by means of a signal-controlled priority light at Butterfield Avenue.
- Concern of environmental destruction to trees, biodiversity and wildlife in particular wintering birds, frogs, squirrels, ducks and many other species.
- Concern of impact upon vulnerable groups who use the woodland area.
- Concern of climate crisis and impact upon important hydrological resource.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Unnecessary, impact upon Rathfarnham Castle Park.
- No new issues raised.

5. Alison Dwyer (General Impacts to City)

- Concern of CPO of lands
- Concern of destruction of existing medieval 17th / 18th century Victorian cityscape.
- Concern of destruction of the existing built environment.
- Concern of decimation of existing historical street furniture, front gardens, trees, footpaths.

- Concern of destruction of trees.
- Proposal designed by road design engineers and is not appropriate for a European City.
- Concern of visual impact and impact upon good urban design principles.
- The proposal is fundamentally in contravention of the Dublin City Development Plan.
- Concern of impact of 12 such roads schemes upon the city.
- Cumulative impacts are unacceptable.
- The proposal should be subject to an SEA
- Inadequacy of the information submitted and lack of assessment of in combination effects is such not to allow the Board to carry out AA
- **Request an OH be held**
- Query justification and need for the scheme.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Insufficient response
- Lack of official OH
- Updated DCC Development Plan not taken into account.
- Insufficient information lodged to carry out AA
- No new issues raised.

6. Andrew Baird (Highfield Road)

- Query justification and need for the scheme.
- CBA required
- No apparent consideration of other options.
- Concern of impact upon villages and suburbs.
- Concern of increased traffic on Highfield Road and impact upon adjoining residential roads from displaced traffic.
- Concern of loss of delivery set down spaces to service local businesses.
- Concern of impact on trees on Highfield Road, effects on wildlife on Highfield Road, Noise and Air Quality.

- Concern decision to change original route option on Rathgar Road is unfair and contrary to Aarhus Convention. Lack of consultation.
- The one way system on Rathgar Road needs to be revisited in the context of observations from Highfield Road.

7. Ann and Bryan Strahan (Rathmines / Rathgar / Terenure)

- Concern of impact to historic area of Rathmines / Rathgar / Terenure and surrounding area.
- Concern of impact upon boundaries, railings, gates and trees.
- Concern of lack of consideration of Park and Ride facilities.
- Concern of loss of access to schools, clubs, churches, leisure centres, sports clubs etc
- Concern of adverse effect on the villages, traders, businesses, residents and the elderly who are unable to cycle.
- Concern of narrowing of footpaths.
- No justification for building a proposed bridge at the Dodder.
- Adopt the submission by Rathgar Residents Association.

8. Ann Moore (Fortfield Road into Laverna Grove)

- Concern of 'no right turn' from Fortfield Road into Laverna Grove.
- Concern of impact to local residents
- Concern of traffic congestion, bottlenecks and delays.
- Concern of access for emergency vehicles
- Concern elderly and parents with small kids will be unfairly disadvantaged having to make extended and inefficient journey to access their homes.

9. Ann O'Donnell (Church Lane Rathfarnham)

- Concern with respect to public health and air pollution
- Concern of proposed construction compound.

10. Anna Shanley and Ryan Stempniewicz (Relocation of Bus stop)

- Concern of relocation of a bus stop, at No. 34 Terenure Road East to the front of Nos 12, adjacent to No. 14 Terenure Road East (TRE) (which is a protected structure) in terms of traffic safety, health, privacy.

- Concern of impact to access to No. 14 TRE
- Concern of creation of a traffic hazard for entry and exit from No. 14 TRE
- Concern of impact to residential amenity, air and noise pollution
- Lack of consultation
- Relocation for bus stop is inappropriate for passengers, residents, local businesses or other vehicle users.
- Concern the Bus Stop would be too close to the junction, this would cause flow of traffic to be blocked.
- Concern of impact upon built heritage and protected structure status.
- Concern of devaluation of property.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- NTA response re distance between bus stops to the front of 12 TRE is insufficient, will increase the distance between stops and impact / impede vehicular access.
- Insufficient consultation.
- Negative impact upon Rathgar Village, commercial area.
- No new issues raised.

11. Anna, John and Sarah Meehan (General Terenure)

- Query the justification and CBA for the scheme.
- Concern of tree loss and woodland area at Rathfarnham Castle Park
- Concern of significant environmental impact
- Concern of impact upon biodiversity of the park
- Concern of impact upon hydrology and Whitechurch Stream (which has not been identified or assessed in the documentation).
- Concern of loss of public amenity.
- Concern of reduced access to traditional thoroughfare roads.
- Concern of traffic congestion, displacement on to surrounding residential streets and disruption for very little gain.
- Concern of no cumulative impact of all of the busconnects routes.
- Concern of introduction of LED lighting
- Concern of lack of engagement on any alternatives.

- Concern of lack of Park and Ride
- The timing of the Bus gates is nonsensical and unnecessary for residents.
- Permanent right and left turn bans are unnecessary and don't take account of local needs.
- Concern of removal and relocation of bus stops.
- Flawed public consultation.
- **Requests an OH be held**
- Flawed traffic modelling and counts
- Concern of access and mobility for elderly and disability access.
- Concern of reduced access to Saint Luke's Hospital and other hospitals, services and businesses.
- Concern of reduced access to parks, sports facilities and playgrounds.
- Concern of impact upon archaeological, architectural and cultural heritage.
- Concern peripheral roads will become rat runs.
- Concern of closure of the church in Rathmines.

12. Anne Marie James (Rathgar)

- Concerns over relocation of bus stop from 86 Rathgar Road to 78 Rathgar Road.
- Concern with respect to traffic safety.
- Concern with pedestrian safety and crossing the Rathgar Road (five lane road).
- Bus stop would be more appropriate outside Butlers and Iconic, outside the big, tall, red apartment block.
- Relocating the bus stop closer to the village ensures greater accessibility.
- Concern with impact of the corridor on the community of Rathgar village.
- Harmful effect of diesel buses.
- No account has been taken of the changed landscape since Covid, people working from home.
- Environmental, social and aesthetic concerns.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No new issues raised.

13. Anne McMonagle (Orwell Road, Rathgar)

- Query justification and need - commuting patterns have changed considerably since Covid.
- Suburban villages / centres act as bottle necks and widening the route in part is a waste of time.
- Negative impact on older / less mobile people, less accessibility.
- Propose introducing a trial of the traffic changes.
- Loss of trees is of paramount concern.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No new issues raised.

14. Anne Neary and Conor Farren (Rathgar)

- Concern of justification and need for the scheme for little gain.
- Concern of impact upon Rathgar Village, heritage, trees and wildlife.
- Concern of increased emissions, noise, air, dust.
- Concern of traffic chaos and loss of car parking spaces.
- Concern of reduced width footpaths and overall safety of proposed cycle paths.
- Object to relocation of city bound bus stop on Rathgar Road to outside no. 77 – no. 80 Rathgar Road.
- Concern cumulative impact of all of the busconnects routes not assessed.
- Concern of inadequate traffic modelling and counts.
- Concern of traffic impact forcing all buses through Rathgar.
- Concern of inadequate public transport service for Harolds Cross Road.
- Concern of failure to consider Harolds Cross Road in the context of Busconnects route option.
- Support the submission of neighbours and all Rathgar residents.

15. Anne Neville (Woodview Cottages)

- Concern to the proposed construction compound in the green area between Dodder View Road, Woodview Cottages and Church Lane, Rathfarnham.
- This area was used as a temporary depo for Dodder Greenway works.
- Concerns in relation to:
 - Loss of public amenity
 - Damage to biodiversity (storage of hazardous materials)

- Impact upon residents (dust, traffic, nighttime lighting)
- Suggest an alternative non-residential location be explored.

16. Anthony Gorman (Rathmines Road Lower)

- Concern of impact of loss of accessibility for car access and stopping along Rathmines Road Lower (RRL)
- Negative impact upon businesses.
- Concern of impact upon Spar on RRL.
- Concern of job losses and fewer customers.
- **Requests an OH**

17. Antonio Autorita (Rathmines Wood)

- Concern of impact to vehicular access for elderly and disabled to local parish church – Church of Mary Immaculate Refuge of Sinners in Rathmines.
- Concern of restricted access to car parks serving people attending church.
- Concern of hours of operation of Bus Gate on Rathmines Road from 6am – 8 pm and request it be altered to 6am – 9am and 4pm – 8pm.

18. Aoidbhen O Curraoin (Templeogue Village to Terenure Village - Church)

- Concern of justification and need for the project.
- Concern of reduction of bus frequency along the route.
- Failure to consider cumulative effects of other proposed bus corridor schemes.
- Concern of failure to consider alternative and cheaper solutions.
- Concern for impact of right / left turn bans on local residents, increased journey times.
- Concern of traffic congestion, rat running and delays.
- Concern of the proposed bus gate in Rathmines and the impact of this on Rathmines Church of Mary Immaculate.

19. Aoife & Patrick Ryan (Rathgar Road – narrowing of footpaths)

- Concern of narrowing of footpaths
- Lack of consideration for pedestrians
- Support the Rathgar Residents Association submission.

20. Aaran Timms and Others (Rathmines Road Lower RRL- Bus gate)

- Concern of direct impact of the proposal (the bus gate) and its indirect impacts (Vehicular traffic redistribution) will affect established residential areas.
- Concern of accessibility for local residents to schools, local shops, Gp surgeries, extended family, services and amenities.
- Concern there will be a reduction in overall capacity for general traffic, causing redistribution to the surrounding road network.
- The bus gate is akin to, a kind of, near permanent road closure.
- Concern right and left hand turn bans and various diversions will result in vastly extended journey distances for essential journeys.
- The bus gate does not allow access for residents
- Propose mitigation as follows is considered:
 - Relocation of the bus gate north to La Touche Bridge; and or
 - Exemption of local residents from the bus gate operation, via selective vehicle registration plate identification (or similar): and / or
 - Revision of the bus gate from bidirectional, to north bound direction only.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Insufficient response
- Concern of impact upon vehicular access (1 The Brambles Blackberry Lane)

21. Ava Thornton (Trinity - Biodiversity and trees)

- Concern for the protection of ecosystem services provided by mature trees in the urban and suburban areas of Dublin.
- Support the ambition to increase cycleways to c.200 kilometers and public transport throughout the city.
- Support increased bike use, reduction in greenhouse gases and other particulate air pollutants providing a direct means of addressing the UN Paris Climate Agreement by reducing Irelands transport related carbon emissions.
- Concern with the lack of adequate consideration given to the removal of garden and street trees and shrubs throughout the proposed scheme.
- Request a detailed natural capital plan for the bus corridor to be carried out so that the true economic, ecological and cultural value of the proposed corridor is assessed.
- Request an appropriate and equivalent replanting plan to be designed

- Concerned the tree surveys should be carried out.
- Concerning the esthetic model cultural biodiversity value of maturities lost can be evaluated against the value gained by expansion of cycle roots and bus lines.
- Concern appropriate mitigation can be designed and implemented.

22. Ballyboden Tidy Towns clg (Woodland of Rathfarnham Castle Park)

- *Submission raises all similar issues raised in Rathfarnham Wood Residents Association submission see below. I have summarised some of the main issues as follows:*
 - Concern of substantial permanent harm to a large section of the woodland of Rathfarnham Castle Park.
 - Concern of damage to the curtilage and setting to an important National Monument and Protected Structures
 - Concern of impact upon with Rathfarnham village green space adjacent to Woodview cottages and Rathfarnham Mill, known locally as Spiders Hill for the purposes of a construction compound as it is a floodplain.
 - Concern of negative impact upon ecology, hydrology, wildlife, biodiversity, and cultural heritage.
 - Specific concern of impact to Glin River biodiversity and hydrology.
 - Concern of impact to tranquillity of parkland, play space, use by people with autism and sensory issues, and children.
 - Concern of pedestrian, traffic, and cycle safety.
 - Concern of the need and justification for the project.
 - Concern of breaches of the Habitat Directive
 - Concern of breaches of Water Framework Directive.
 - Concern of cumulative impact of in combination effects.
 - Concern of cost benefit of the proposal.
 - Concern of lack of clear information / informed public participation.
 - The bus corridor should cease at the end of the dual carriageway beside Rathfarnham Village (at the junction with Butterfield Avenue) rather than extending past the park. Bus priority for outbound buses could be achieved by utilising a bus priority signal.
 - Concern of lack of adequate footpath or continuous cycle lanes and infrastructure in the Rathfarnham village and Nutgrove Avenue area.
 - Concern of public participation in the proposal and Aarhus Convention – flawed process.

23. Barbara Atkinson (Terenure Village)

- Query the need and justification for the project.
- Concern of traffic safety, traffic chaos, congestion for local residents, redistribution of traffic to surrounding roads, longer journey times, .
- Concern of noise and pollution.
- Concern of loss of trees, ancient garden walls.
- Concern of impact upon biodiversity wildlife systems.
- Concern of ageism, roads too wide and dangerous, bus stops relocated and further away from each other.
- Concern of impact upon the village of Terenure, businesses, community, services and amenities.

24. Barbara Molloy (Highfield Road Rathgar)

- Concern with change of Rathgar Road to one – way route.
- Concern of increase in traffic and impact to Highfield Road and other minor roads in the area.
- Concern of grid lock.
- Concern to cyclists' safety, in particular, children, from rerouted traffic on narrow roads.

25. Barbara Smith (Terenure impact to villages)

- Concern of impact upon historic urban villages of Terenure, Rathgar and Rathmines.
- Concern of reduced access and car parking and resultant impact upon businesses, services and amenities.
- Concern of impact upon environment, ecology, biodiversity and wildlife.
- Concern of loss of trees.
- Query the need and justification of the project.
- Concern of bus gates and right / left turn bans, esp in Terenure
- Concern of inconvenience and traffic journey increases for local residents.
- Increase in traffic, noise and air pollution.

26. Barry and Bairbre Redmond & Leo and Marina Casey (Rathdown Villas, Terenure)

- Support the objection submitted by Senator Mary Seery Kearney.
- Concern of impact of the proposal on Templeogue and Terenure
- Concern of priority of speed of travel at the expense of daily disruptions for residents.

- Concern of right / left turn bans, esp from Templeogue Road into Rathdown Avenue and into Rathdown Park
- Concern of diversion of local traffic, increased journey time, traffic congestion.

27. Barry and Patricia Devaney (Highfield Road)

- Query justification and need for the scheme.
- Query traffic county surveys carried out.
- Concern of increase / displacement of traffic to surrounding residential roads
- Concern of impact of increased traffic on local residents esp. of Highfield and surrounding 'rat run' roads.
- CBA required
- No apparent consideration of other options.
- Concern of impact upon villages and suburbs.
- Concern of loss of delivery set down spaces to service local businesses.
- Concern of impact on trees on Highfield Road, effects on wildlife on Highfield Road, Noise and Air Quality.
- Concern decision to change original route option on Rathgar Road is unfair and contrary to Aarhus Convention. Lack of consultation.
- The one way system on Rathgar Road needs to be revisited in the context of observations from Highfield Road.

28. Beaufort Downs Residents Association (Rathfarnham)

- Support the Rathfarnham Wood Residents Association submission.
- Concern of proposed destruction to a large section of the woodland of Rathfarnham Castle Park.
- Concern of loss of trees
- Ecological and environmental impact assessment by NTA is vague and difficult to understand.
- Concern of impact to Whitechurch stream biodiversity and hydrology.
- Concern of impact to biodiversity, esp. breeding birds and protected species.
- Concern school drop off by bus / car park at the junction of Nutgrove Ave / Grange Road Rathfarnham Wood will have a negative impact upon local residents.

- Concern of construction works to Grange Road again.
- The bus corridor should cease at the end of the dual carriageway beside Rathfarnham Village (at the junction with Butterfield Avenue) rather than extending past the park. Bus priority for outbound buses could be achieved by utilising a bus priority signal.
- Concern the extension of the Grange Road over the Whitechurch Stream would cause damage to a fragile watercourse and environment.
- Concern of risk of flooding.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Insufficient response.
- Concern of impact upon Rathfarnham Castle Park – tree loss.
- Concern of impact upon Giln River.
- No new issues raised.

29. Belgrave Residents Association

- Supports the objectives of and enhanced public transport structure within the city.
- Concern of redistributing traffic to adjoining local roads
- Concern of traffic congestion in Rathmines and Ranelagh.
- Concern of access to Rathmines – bus gate and left and right hand turn bans.
- Consider consideration should be given to priority traffic lights.
- Concern of footpath width adequate for foot fall.
- Concern of environmental impact, increased carbon emissions.
- Concern of lack of park and ride consideration / inclusion.
- Concern of loss of trees

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Oppose the scheme as it stands.

- No new issues raised.

30. Ben Costello (Rathdown Drive – Terenure)

- Welcome proposed vehicular and cycle traffic changes in Templeogue village.
- Opportunity should be taken for restoration of railings and stone walls at Rathdown Drive.
- Welcome the proposal to streamline and relocate the existing bus stops.
- Provision of a quiet street treatment on Rathdown Drive and Crescent is very welcome.
- Concern of illegal parking for those accessing and using Bushy Park.
- Additional car parking could be provided at Springfield Avenue adjacent to existing car parking area, to alleviate car parking problems in Rathdown.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No new issues raised.

31. Bernadette Behan (Castlewood Ave, Rathmines - Church)

- Concern of restricted access to Mary Immaculate Refuge of Sinners Church in Rathmines
- Concern of hours of bus gate restrictions
- Propose hours of bus gate be amended to 6 am – 9am and 4pm – 8pm only, to facilitate mass and other services.

32. Bernadette Quigley and Alessandro D’Erme (Rathmines)

- Concern of lack of modelling and inaccurate traffic counts.
- Concern of insufficient consultation
- Concern for lack of regard for environmental, social, financial and safety concerns
- CBA indicates the proposal is flawed.
- Concern of loss of trees and impact upon biodiversity and wildlife.
- Concern of traffic displacement to surrounding residential roads making them unsafe for local residents and school children.
- Concern of right and left turn ban restrictions will impact local residents trying to access and exit their homes.

- Concern of air pollution
- Concern segregated cycle tracks are not continuous
- Concern of impact upon access to the Church of the Three Patrons in Rathgar, esp. for elderly.
- Cumulative impact of bus connects projects required.
- Concern of difficulty and terms of the information available – lack of genuine consultation.
- Concern of bus gate hours of operation.
- Concern need, justification and feasibility of the project.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Insufficient response.
- Concern of misleading modelling of future behaviour and data analysis.
- No new issues raised.

33. Bernardine Cantwell (Leinster Road Rathmines)

- Object to a bus corridor on Rathgar Road and CPO of lands to facilitate this.
- Concern of loss of trees.
- Concern of loss of period architecture and heritage.
- Consideration should be given to an electric bike scheme, connection along this route.
- Environmental and health concern.

34. Bernard Colman Muldoon and Mary Muldoon (Rathfarnham Road)

- Object to CPO of lands
- EIAR deficient
- The NTR has not complied with legal principles in relation to the CPO of private property. Not justified and not proportionate.
- Concern of impact on urban villages for community, social and safety reasons.
- Cumulative impact of all of the bus connects schemes needs to be carried out. Established in O’Grianna
- Concern of failure to justify the interference with constitutional property rights.

- Impairment of constitutional rights as property owners affected by CPO of lands.
- Justification and need for the proposed bus connects scheme is queried.
- Concern of negligible time saving for passengers.
- Concern of reduction in size of front gardens – too small to turn a car.
- Concern of traffic hazard to pedestrians, cyclists and motorists.
- Concern of hazard and accident accessing and entering driveway.
- Concern of increased noise and toxic emissions, pollution.
- Welcome provision of cycle lanes
- Concern for safety of school children and pedestrians’ dangers of negotiating roads (4 lanes of traffic) and traffic at high speeds travelling through villages, adjacent to schools, shops and people’s homes.

35. Bertha Walsh (Templeogue Road – Bus Stops)

- Support the submission by Senator Mary Seery Kearney in her submission in relation to the same bus stop.
- The plan to consolidate the 2 bus stops from 239-237 to 217-219 Templeogue Road is entirely unsuited, as traffic turning left on to the Fortfield Road will encounter mayhem.
- Concern the proposed bus stop is far too near that corner.
- Templeogue Road between Templeogue Village and Fortfield Road junction is on course for accidents.
- The area of the road it is being moved to outside number 217 is on a part of the road prone to flooding and where the footpath is very narrow.
- Concern residents in the area will be negatively impacted.
- The original location meant that buses did not impede the flow of traffic as the road is wide enough to safely pass out.
- Concern local knowledge is being ignored.
- question whether there is a need at all to have a bus stop along that section of road at all.

36. Betty Murphy (Templeogue Road – Bus Stops)

- Reiterates the same points raised by Bertha Walsh Templeogue Road, see above.

37. Brendan Heneghan (Terenure Bus Stops)

- Believe there is considerable merit to the central features of the plan, particularly the bus gate at Lower Rathmines Road, the one way proposal on Rathgar Road and the cycling infrastructure.

- Serious procedural issues.
- Concern the time savings claimed are modest.
- Concern there is little provision of extra buses.
- Concern of a major decrease on the Templeogue Road
- Concern the proposals will contribute negatively to the environment.
- Concern of excessive use of bus gates on main roads for excessive lengths of time.
- **Request and OH**
- Concern Aarhus Convention not complied with.
 - Time limits inadequate to get professional advice.
 - No notices erected in areas directly adversely impacted.
 - Documentation is poorly presented.
 - Fees inappropriate.
- Further traffic assessment by experts is required.
- There are many errors and omissions in the plans.
- Concern of removal of trees on Terenure Road East.
- Concern of displacement of traffic and knock on effect.
- Concern of bans on right turns from Fortfield Road
- CPO of lands on stretch of Templeogue Road should not proceed.
- The ban on a right turn from Templeogue Road into Rathdown Avenue should be time limited to avoid cutting off vehicular access to Bushy Park.
- CBA required.
- Concern that a Luas on this corridor would be more appropriate and is mooted to be put in place down the line.
- Concern of extended construction works for years if both projects go ahead.
- Concern of contribution to climate change (loss of trees / longer journey times)
- Concern of lack of a plan for HGV's
- Concern of removal and relocation of Bus stops at no. 237 and 239 Templeogue Road and at Terenure College

- The relocation and consolidation of the Bus stops to 217/219 Templeogue Road is unacceptable from a footpath width, traffic volume and flooding perspective.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Insufficient response
- Failure by NTA to accept any observers' submissions.
- Concern of tree loss on TRE
- Concern of bus turning movements at Terenure Cross
- Concern of turn bans and impact upon access arrangements. Need for further independent analysis.
- Unreliable data used.
- Unreasonable to not permit additional time for Professor Smyth to respond to NTA's response.
- Response time afforded to observers is unfair.
- No new issues raised.

38. Brendan Timbs (Rathfarnham Road – steeper gradient access)

- Concern of impact to 63 Rathfarnham Road – removal of 23.7 sq. m of front garden (Plot List 1073(1).1d, 1073(2).2d)
- Concern alterations will give rise to a significantly steeper access gradient and breach of part M of the Building Regulations.
- Concern that it is excessive to remove front boundary walls and parts of front gardens just to achieve a cycle lane where a shared cycle / bus lane exists already.
- Concern sufficient and competent traffic modelling has not been carried out.
- Concern of rerouting of traffic and traffic chaos.
- Concern of environmental impact.
- Concern a holistic approach under EIA Directive that all environmental impacts of all of the Busconnects schemes are not considered.

- Concern that signal controlled junctions at Dodder Park Road and Rathdown Park, only 260m apart, will lead to traffic congestion.
- Concern of width of footpaths esp. at 51 – 57 Rathfarnham Road
- Concern that the proposal contrary to the zoning Z2.
- Concern of traffic hazard and health risks.
- Flawed public consultation and non-adherence to Aarhus Convention
- Concern of need and justification of the scheme – actual time saving queried.
- Lack of consideration for Local Residents living in urban villages.
- Concern of impact upon heritage.
- Concern private traffic forced onto secondary roads and into housing estates will cause grid lock.
- Concern of lack of Park and Ride proposals.
- Concern the merits of a Metro network has not been given due review.
- Concern a CBA has not been adequately carried out.
- **Request that an OH be held.**
- Submission accompanied with report by RW Nowlan & Associates on behalf of residents of no.'s 51 – 57 Rathfarnham Road & NRB Consulting Engineers report C/O residents of 55, 59, 61, 63, 65, 67 and 71 Rathfarnham Road. Focuses on inadequate topographical information provided to residents to clearly determine the effects on their properties for accessibility in terms of Part M, of National Building Regulations. It is concluded that the proposed scheme would result in a significantly steeper approach for the majority of subject dwellings on Rathfarnham Road.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Insufficient response
- Lack of confidence in the NTA approach to addressing submissions
- Query professional assessment and judgement.

- Lack of official OH
- Lack of specific information 'before and after' section presentation of impacts upon property and in particular the driveway and frontage.
- In-combination effects not considered, touchstone referencing to software tools and a multiplicity of jargon.
- No Park and Ride considered and no response to this matter.
- Inconsistency in NTA treatment of similar road sections.
- Contravention of the Dublin City Development Plan.
- Accompanied with letter from NRB Consulting engineers dated 14th March 2024. States that information requested on 'before and after' cross sections through the resident's properties from Rathfarnham Road to the boundary wall of each house clearly demonstrating Part M compliance, has not been provided.
- No new issues raised.

39. Brian and Audrey Mooney and John and Lisa Browne (Rockfield Drive)

- Negative impact upon daily lives of residents.
- Concern bus corridor will impact upon their ability to operate their business (Electrical and alarm company)
- Concern of traffic delays and impact upon working lives, diminished access to services, shops and workplaces.
- Concern of traffic chaos.

40. Brian and Ethna Healy (CPO & Rathfarnham Wood)

- Concern to the proposed CPO affecting their property at 11 Rathfarnham Wood Plot List 1019(1).1d, 1019(2).2d
- Concern of proposed CPO of woodland area of Rathfarnham Castle Park Plot list 1001(1).1f; 1001(2).2f.
- Concern of amount of lands acquired permanently (38.7 sq. m) and amount of land sought temporarily (31.3sq.m)
- Concern of level of disruption and environmental impact.
- Agree and support all of the grounds of the Rathfarnham Wood Residents Association (RWRA) submission.

- Concern of loss of trees, removal of / impact upon shed and granite boundary wall.
- Concern of impact upon hydrology and Glin River
- Concern Water Framework Directive has not been complied with.
- Concern of impact upon Rathfarnham Castle Park.
- Concern of impact upon climate, flora and fauna, landscape and visual, noise, vibration and air.

41. Brian Walker, Carol Walker, Alison Walker (Church – Terenure)

- Concern of breach of Aarhus Convention and Habitats Directive
- Lack of public consultation
- Concern of removal of trees.
- Concern of impact on Bats
- Concern alternatives have not been properly considered i.e. Metro
- Query the demand, need and justification for the project.
- Concern of plan for HGV's
- Concern of location of Bus Stops (Flooding at Our Lady's School)
- Need for 24/7 bus gates queried.
- Bus gates should be confined to morning, afternoon and evening.
- Concern time saving claims are unrealistic.
- Concern of destruction of heritage communities and local businesses, local retail, religious and educational facilities.
- Concern of traffic congestion, rat running, increased traffic and traffic chaos. In particular to Terenure Road West, Fortfield Road and Greenlea Road.
- Loss of car parking spaces and loading bays.
- Loss of pavement width
- Loss of driveways, gardens, trees, walls.
- Impact upon property value.
- Concern of impact upon parishioners who attend church in Rathmines.
- Concern of location of construction depo in Terenure at Taxi rank
- **Request an OH**

42. Bridget O'Donoghue and Others (Rathfarnham Construction compound @ Dodder View Road / Church Lane / Woodview Cottages)

- Concern of location of construction compound TR3 at Dodder View Road / Church Lane / Woodview Cottages
- Concern of impact upon health – dust, dirt, noise levels.
- Concern of pollution from the site – impact to Glin River.
- Loss of public amenity.
- Concern of impact upon biodiversity.
- Concern of flooding.
- Concern of impact upon archaeological and heritage impact.
- Concern of traffic hazard and safety risk to cyclists and pedestrians.
- Concern to the scale of the compound.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Insufficient response
- Request further consultation.
- No new issues raised.

43. Butterfield District Residents Association

- Agree some elements of Busconnects will benefit the community.
- Concern of the convergence of buses at Terenure Crossroads to continue down Terenure Road East.
- Concern how south Dublin spines will link to north Dublin spines.
- Concern of width of road space, cycling and pedestrian lanes.
- Concern of road changes to Dodder View Road.
- Concern of restrictions to general travel possibilities.
- Concern of high proportion of elderly residents.
- Concern of access to social arrangements, amenities, health care, services and shopping.
- Care workers will continue to need car parking spaces and car journeys.
- The bus corridor should cease at the end of the dual carriageway beside Rathfarnham Village (at the junction with Butterfield Avenue)

rather than extending past the park. Bus priority for outbound buses could be achieved by utilising a bus priority signal.

- Loss of a substantial amount of woodland (approx. 450m) to construct a outbound bus lane, at a huge cost in terms of biodiversity and the environment dos not make sense.
- Endorsement and support for the submission by Metro Southwest Group.
- Endorsement and support for the submission by Rathfarnham Wood Residents Association.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Insufficient, incomplete response to objections raised.
- Concern of impact upon Rathfarnham Castle Park.
- No new issues raised.

44. Caitriona Holt & Ken Dolan (Terenure)

- Concern of impeded access to Terenure Village, Templeogue, Bushy Park, Baggot Street.
- Concern that the cycle lane system is not safe or viable.

45. Catherine and Brendan Garvan (Upper Rathmines Road)

- Concern with increased heavy traffic volume, esp. on Upper Rathmines Road.
- Concern of the environmental impact of the scheme.
- Harmful effect of pollution on health.

46. Catherine Gaffney (Woodview Cottages)

- Concern of location of construction compound TR3 at Dodder View Road / Church Lane / Woodview Cottages.
- Concern of proximity and impact upon residents.
- Concern of loss of a precious green space used by the whole community.
- Concern of duration of construction phase impacts (2 years).
- Concern of impact upon architectural conservation area.

- Concern of loss of biodiversity and ecology.
- Concern of impact upon health – dust, dirt, noise levels.
- Concern of pollution from the site
- Concern of flooding.
- Concern of traffic hazard and safety risk to cyclists, children, and pedestrians.
- Concern to the scale of the compound.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Insufficient response
- Concern of location of construction compound TR3.
- Highlight response by SDCC in relation to TR3.
- No new issues raised.

47. Cedar Court Residents Association (Terenure)

- Concern of reduced bus service on Terenure Road North / Harold's Cross Road.
- Lack of recognition of recent apartment developments in the area.
- Concern of traffic overspill / traffic dispersion from traditional main roads, turned into core bus corridors.

48. Celine and John Cullen (Templeogue & CPO)

- A part of their rear garden at 14 Fortrose Park is subject to CPO
- Proposals are an improvement on the original proposals.
- Concern of absence of continuous cycle lanes south of Templeogue Village, creating a serious road traffic safety problem.
- Scheme needs to be redesigned to prioritise cycle and bus traffic over general traffic along the entire stretch at Templeogue Village.
- Concern of permanent CPO of private rear garden amenity space.
- Concern of temporary CPO of additional garden space.
- Concern of impact of temporary land take and duration, proximity to living space and use of garden shed.
- Concern of loss of a Magnolia tree.
- Concern of impact to health and amenity.

- Concern of displacement and nuisance.
- Loss of boundary trees and privacy.

49. Christian Schaffalitzky (Rathgar)

- Concern in accuracy of the modelling data.
- Concern of displacement of traffic and rat running.
- Increased traffic to adjoining residential roads – Highfield Road, Templemore Road, Neville Road and Vernon Grove.
- Question the justification of the proposal.
- Concern no one in the indirect study area has been consulted – negative consequences.
- Breach of Aarhus Convention
- **Request an OH**

50. Christine Artcanuthurry & Lorcan Burke (Terenure, Kimmage and Rathgar)

- Question the need, justification and benefit of the proposal.
- By the time the project is complete it will be obsolete.
- Communities not corridors.
- Consideration of alternatives imperative – Metro service.
- Concern the proposal is inappropriate and excessive
- Concern of increased journey time for local residents
- Concern of disregard for the environment.
- Concern of access by elderly
- Concern of changing pattern of peoples lives, work and use of new technologies (Scooters).
- Concern experience of past transport infrastructure changes is not taken into account.
- Concern of loss of community, destruction of historic homes and gardens, endangering pedestrian crossings.
- Destruction of the environment as trees, birds and wildlife habitats are negatively impacted.
- Concern of displaced traffic and parked cars.
- Concern of devaluation of homes.

51. Ciara McElinn (Rathfarnham Wood)

- Concern of CPO of rear garden amenity space of 12 Rathfarnham Wood Plot List 1020(1).1d, 1020(2).2d

- Concern of proposed CPO of woodland area of Rathfarnham Castle Park Plot list 1001(1).1f; 1001(2).2f.
- Concern of loss of large portion of south facing rear garden (permanent 5m in depth and a further 3m temporarily).
- Concern of level of disruption and environmental impact.
- Agree and support all of the grounds of the Rathfarnham Wood Residents Association (RWRA) submission.
- Concern of loss of trees, removal of / impact upon nesting birds, frogs, shed and granite boundary wall.
- Concern of impact upon hydrology and Glin River.
- Concern Water Framework Directive has not been complied with.
- Concern of impact upon Rathfarnham Castle Park.
- Concern of impact upon climate, flora and fauna (bats, wild birds, waterfowl, frogs and bees), landscape and visual, noise, vibration and air.
- Concern of traffic safety for pedestrians, cyclists and motorists.
- Misleading maps and details in the scheme documentation
- Breaches of Aarhus Convention
- Disproportionate interference with property rights
- Cease the bus corridor at the Butterfield Avenue junction.
- Submission accompanied with letters from South Dublin County Council re Rathfarnham Castle Lake / stream, The submission by Rathfarnham Wood Residents Association. A letter from IFI. A letter from The Good Shepard NS. A letter from Rathfarnham Educate Together NS, Scoil Naomg Padraig, Rathfarnham Parish, Ballyroan Boys NS, AS I AM – Irelands National Autism Charity, Involve Autism.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Insufficient response
- Concern that the option of acquiring lands on the southern side of Grange Road between Butterfield Avenue / Rathfarnham Road Junction and Nutgrove / Grange Road junction was not considered.

- Importance of Rathfarnham Castle Park not appreciated.
- Importance of biodiversity and negative impact.
- Extending the Bus Corridor past the park does not make sense.
- No new issues raised.

52. Ciaran Ahern (Labour Party)

- Broad Support for the project on the following grounds:
 - Population and Housing growth
 - Environmental and climate considerations
 - Health considerations
- Recent Ballyboden High Court Judgment regarding sufficient public transport provision is relevant.
- Concern level of greenhouse gas emissions coming from transport and the private car need to be reduced.
- Only realistic proposition for increasing public transport and active travel is via enhanced bus and cycle network system.
- Do not agree traffic is displaced; rather it is removed.
- Behavioural change is required and necessary.
- Health benefits associated with active travel.
- Welcome changes incorporated based upon feedback to date.
- Continuous segregated cycle lanes a priority.
- Welcome the transformation of Spawell roundabout.
- Concern of land take at Rathfarnham Castle Park
- Welcome bus gate in Rathmines.
- Prefer to see reallocation of road space rather than CPO
- Endorse the submission by Dublin cycling campaign.
- Continued communication campaign must accompany the roll out of the scheme.
- Immediate enhancements are needed in terms of bus network design, increased number and frequency of busses on all routes, increased reliability of real time passengers, enhanced safety measures, contact less payment, monthly integrated fare system and free public transport for children and students.

53. Ciaran Mulligan & Brian McCormack (Highfield Road)

- Concern of displacement of traffic to Highfield Road.
- Concern of traffic congestion, safety for pedestrians and cyclists.
- Request Rathgar Road is left open to two way traffic or else retain the current road restrictions prevent cars turning from Upper Rathmines Road into Highfield Road.

54. Clare Fitzpatrick & Will Czerniak and Others (Rathgar)

- Concern of the justification of the scheme.
- Concern of justification, creditability and accuracy of material presented.
- Concern of level and adequacy of public consultation.
- Concern environmental assessment is inadequate and flawed.
- Contrary to Aarhus Convention.

55. Clare Sexton (Rathgar)

- Concern of lack of car parking
- Concern of impact to businesses (service deliveries)
- Concern of destruction of an historic area.
- Concern of justification of the project.
- Concern of loss of mature trees
- Question claims of shorter journey times
- Concern of lack of park and ride
- Endorse the submission made by Rathgar Residents Association

56. Claudia Gentile (Rathgar)

- Endorse the submission made by Rathgar Residents Association & Cllr Anne Freaney.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Agree with Rathgar Residents Association submission.
- No new issues raised.

57. Cliona Hickey (Rathmines)

- Concern of disruption to services esp. meals on wheels service.
- Concern of access to Church in Rathmines

- Concern of access for mobility impaired citizens.
- Concern of displacement of traffic and rat running in adjoining residential streets.

58. Cliona Maughan (Rathgar)

- Query the justification and need for the project.
- Concern of impact upon traffic congestion and displacement.
- Concern of traffic hazard, esp. to school children cycling and walking
- Concern of impact upon quality of life of residents
- Concern of environmental and ecological impact of route 12
- Concern of impact upon traffic arising from closure of Rathgar Road to outbound non bus transport.

59. Cliona Mullen (Rathgar)

- **Request an OH**
- Concern of negative impact to Rathgar Village as well as surrounding villages of Terenure and Rathmines.
- Query the justification and time saving gains.
- Concern of impact upon historic and architectural heritage.
- Support improvements to cycle lanes and public transport.
- Concern heritage and community will be compromised.
- Concern for loss of trees and wildlife
- Concern of impact upon Church Mary of Immaculate Refuge of Sinners in Rathmines.
- Concern of reduced footpath width
- Concern of displacement of traffic to adjoining residential streets.
- Concern it is a short-term solution and waste of money.
- Concern Park and ride facilities not proposed.
- Concern Harolds Cross Road was discounted and excluded when selecting the route.

60. Cllr Lynn McCrave (Fine Gael Cllr)

- Support Rathfarnham Wood Residents Association & Beauford Downs Residents Association
- Concern of the number of trees to be taken out and the granite wall opposite St. Mary's Boys School

- Concern of impact upon Rathfarnham Castle Park – impact upon bats, biodiversity, natural habitats, woodland.
- Support Woodview Cottages Residents Association submission regarding the compound location.
- Concern of impact upon health and wellbeing – dust
- Overall support to increase public transport.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Concern of removal of the Plaza area opposite Village Green.
- Concern of loss of woodland at Rathfarnham Castle Park
- No new issues raised.

61. Cllr. Pamela Kearns (Labour Cllr Rathmines Templeogue)

- Broadly supportive of the scheme
- Support Residents Associations submissions
- Concern of loss of trees
- Concern of impact upon Rathfarnham Castle Park.
- Concern with respect to CPO's
- Concern of displacement of traffic.
- Concern of impact upon traders in Templeogue Village
- Concern of negative impact upon streetscape and visual impacts.

62. Cllr Yvonne Collins (Fianna Fail Cllr. Rathfarnham)

- BusConnects has an important role.
- A light rail / underground system is also needed for growing population.
- An urban school bus system is needed.
- Controversial route and difficult geographically
- Query the justification and demand capacity.
- Support Residents Associations submissions
- Concern of impact upon Rathfarnham Castle Park.

- Consideration should be given to ceasing the bus corridor at the end of the dual carriageway (at the junction with Butterfield Avenue) rather than extending by 450m past the park.
- Concern of positioning and relocation of bus stops.
- Concern of construction compound proposed at Woodview Cottage Green Rathfarnham
- Concern of loss of trees and woodland area.

63. Colin McKeeman (Terenure Road West)

- Concern of displacement of traffic, rat runs and traffic chaos
- Concern of traffic safety and unlawful manoeuvres.
- Concern of proposed timing of bus gate
- Concern of impact to residents and access to services, supermarkets, delivery vehicles and businesses.
- Concern of relocation of inbound bus stop opposite Springfield Road
- Bus gate at Templeogue Road should not be allowed. A bus priority light is sufficient.
- Concern of right-hand turn bans and access to Bushy Park.
- Concern of access to St. Pius X church and post office on Greenlea Road.

64. Colleen Feeley (Highfield Road)

- Concern of justification of the proposal.
- Concern of lack of information of CPO
- Concern of impact to local services, facilities and quality of life.
- Concern of displacement of traffic and safety.
- Concern of impact to Highfield Road.
- Concern of impact upon heritage, protected structures, flora and fauna, noise impact.
- Lack of consideration of alternatives

65. Colm Brophy TD (Templeogue and Rathfarnham)

- Supports improving public transport and climate change.
- Support local resident's concerns.
- Concern of viability of the project compared with alternatives.

- Concern of right turn bans and disruption of local traffic.
- Location of the depo / compound at Wood View Road Rathfarnham.
- Concern of impact upon Rathfarnham Castle Park (loss of trees, woodland, impact upon biodiversity).

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Request that an OH be held.
- No new issues raised.

66. Conor and Anna O’Kelly and Others (Terenure)

- Support the right-hand turn ban from Fortfield Road to Greenlea Road.

67. Conor O’Meara (Terenure)

- Concern of displacement of traffic
- Concern of traffic chaos – No. right turn bans
- Concern of impact to Lavarna Grove / road
- Concern of noise, reduced air quality, pedestrian safety
- Restrictions are needed on Lavarna.

68. Conor Ryan & Siobhan Ryan (Rathfarnham)

- Concern of impact upon urban villages along the route
- Reduction in bus stops is welcomed as it will quicken journey times.
- More sheltered bus stops needed.
- Concern of deterioration in frequency of service.
- Concern of loss of trees at Bushy Park and widening of Templeogue Road.
- Concern of CPO along Terenure Road East, Rathfarnham Road and the Texaco petrol station and over Pearse Bridge into Terenure.
- Concern of justification and need for the project.
- Concern of bus gate traffic time curtailments.
- Concern of displacement of traffic to residential roads.
- Concern of right/left turn bans / changes
- Concern of impact upon elderly residents who depend on their car.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Concern of where A route will go after College Green is pedestrianised.
- The NTA have not indicated its preferred options if Rathfarnham to city centre Airport route has to be diverted around College Green.
- No new issues raised.

69. Cllr Anne Feeney (Kimmage Rathmines & Terenure)

- Supports environmentally sensitive transport solutions
- Proposal should be considered in conjunction with Kimmage to City Centre Bus Corridor application.
- Query the justification and effectiveness of the proposal.
- Concern of viability and cost of CPO
- Concern of impact upon villages along the route.
- Concern of loss of trees.
- Concern of provision of a continuous safe cycling route.
- Concern of operation of Bus gate on Templeogue Road
- Concern of road closures, right turn bans and road widening.
- Concern of access to Church in Rathmines
- Concern of displacement of traffic to adjoining residential streets.
- Concern the proposal is over engineered.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Specific reference and concern re proposed turn bans in Terenure, Rathgar and Rathmines.
- Lack of local consultation as to assess for residents (considerable diversion)
- Traffic impact to already congested local roads.
- Submission accompanied with a submission by FG Councillor James Geoghegan
- No new issues raised.

70. Cllr Carolyn Moore (Green Party)

- Welcome the improvement of public transport system.
- Integral party of the transport solution for Dublin

- Request the due consideration is given to submissions and concerns of communities.
- Bus shelters should be sheltered, safe well designed and incorporate green roofs.
- Public realm improvement should be incorporated and enhanced, esp. in Terenure Village. Critical safe walking, scooting and cycling along routes to schools can be undertaken.
- Disabled parking and age friendly parking bays should be introduced.
- Important to minimise tree loss.
- Concern of proposal to CPO woodland at the boundary of Rathfarnham Castle Park
- Need to ensure adequate capacity on all routes.
- Need to discourage rat running.
- Commit to a programme of monitoring and enforcement.
- Welcome the strong engagement with communities.

71. Danny and Margaret McLaughlin (Rathgar)

- Concern of reduction in quality of life, health and wellbeing of residents affected.
- Concern of negative impact to urban villages.
- Concern environmental impact and cost is much greater than proposed improvements.
- Query the need and justification for the project.
- Concern of loss of trees.
- Concern of traffic displacement to surrounding residential roads.
- Concern cycleways are not continuous.
- Concern of impact of bus gate restrictions and right turn bans on local residents.
- Concern of flawed public consultation process.

72. Daria Sochacka and William McElinn (Rathfarnham Road)

- Concern of impact to Rathfarnham Castle Park and to people who use the park.

- Concern of loss of biodiversity, flora and fauna, hydrology (Glin River), trees and woodland.
- Concern of excessive land take.
- Concern of need and justification for land take.
- Concern of impact to landscape and visual amenity
- Concern of negative impact of noise and vibration and deterioration in air quality.
- The bus corridor should terminate at the end of Rathfarnham village bypass (by the Butterfield Avenue Junction)

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Insufficient response
- Importance of Rathfarnham Castle Park not appreciated.
- Importance of biodiversity and negative impact.
- No awareness or understanding by the NTA of impact upon Glin River, from an environmental or hydrological perspective.
- Extending the Bus Corridor past the park does not make sense, bus corridor should terminate at the end of Rathfarnham Village bypass.
- Excessive land take and unnecessary impact upon woodland area.
- No new issues raised.

73. Darren Twyford (Terenure Road East TRE)

- Query the justification and need for the widening of TRE
- Concern of loss of trees, impact to biodiversity and amenity.
- Concern of impact upon heritage, loss of historic cast and wrought iron railings and old brick / granite walls.
- Concern of impact upon communities, the 'end justifies the means' approach.
- Concern of practicality of rerouting cyclists away from TRE
- Concern of flawed public consultation process.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Excessive felling of trees, esp. along TRE
- Destruction of Heritage Townscapes.
- Lack of adequate consultation.
- No new issues raised.

74. David Byrne (Greenlea Road)

- Query the need and justification for the project.
- Concern of traffic displacement to surrounding residential roads, in particular Fortfield Road, Greenlea Road, Wainsfort and Laverna.
- Concern of traffic, pedestrian, and cyclist safety.
- Concern of deficiency in bus drivers and buses.
- Concern of flawed public consultation process.
- Concern of impact of bus gate restrictions and right turn bans on residents.
- Concern of traffic chaos due to issue of trucks, lack of dedicated right turning lanes, narrow roads and diversions.
- Concern of relocation of the Bus stop outside Terenure College
- Camera technology to ensure enforcement is required.
- Concern of speed and rat running through residential streets.
- Concern of reduced access to Bushy Park and Rathdown.
- Concern cumulative impact of all Busconnects schemes has not been assessed.
- Concern of loss of quality of life for residents
- Concern of loss of trees.

75. David O'Doherty and Niamh Tierney (Terenure)

- Query the justification and need for the widening of TRE
- Concern of loss of trees, impact to biodiversity and amenity.
- Query the need and justification for the project.
- Concern of impact upon heritage, loss of historic cast and wrought iron railings and old brick / granite walls.
- Concern of impact upon communities, the 'end justifies the means' approach.
- Concern of practicality of rerouting cyclists away from TRE
- Concern of flawed public consultation process.
- Support the submission by Senator Mary Seery Kearney

76. David Phelan (Highfield Road)

- Support the overall aims of the development.

- Concern of impact upon local community and residents.
- Concern of displacement of traffic, in particular onto Highfield Road.
- Concern of safety of road users especially pedestrians.
- Query the justification, need and cost benefit of the proposal.
- Concern of loss of trees and gardens.

77. Dearbhail Shannon (TRE)

- Concern of CPO of property at 6 The Townhouses, TRE, Dublin 6. Plot List: 1048(1).1, 1048(2).2d
- Concern of lack of detailed drawings and final designs.
- Concern of flawed public consultation process.
- Concern of negative impact to communities, urban villages and local residents.
- Query the justification, need and cost benefit of the proposal.
- Concern of loss of trees, impact upon heritage, period properties and protected structures, loss of historic railings and old brick / granite walls
- Concern of irreversible damage to the landscape, loss of architectural heritage.
- Concern of displacement of traffic to surrounding residential streets.
- Concern alternative measures have not been considered and trailing of alternative solutions.
- Concern of impact of right turn bans, one-way systems, Bus gates on secondary or small local roads.
- Concern of impact to businesses and service deliveries.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Lack of detailed drawings of the final design.
- Inadequate consultation process.
- Negative and inappropriate impact on trees, landscape, heritage and suburban villages.
- Concern of impact of right turn bans, one-way systems, Bus gates on secondary or small local roads.
- Concern of impact to businesses and service deliveries.
- No new issues raised.

78. Denis O'Connell (Drimnagh)

- Concern of impact to Rathfarnham Castle Park and to people who use the park.
- The bus corridor should terminate at the end of Rathfarnham village bypass (by the Butterfield Avenue Junction)
- Concern of excessive land take.
- Concern of loss of biodiversity, flora and fauna, hydrology (Glin River), trees and woodland.
- Concern of need and justification for land take.
- Concern of impact to vulnerable groups who use the park.
- Concern of loss of woodland habitat and impact to landscape and visual amenity.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Negative and inappropriate impact on biodiversity and wildlife habitat.
- Loss of woodland landscape, impact upon Rathfarnham Castle Park and playground.
- Disregard for importance of habitat for protected species.
- Inadequate explanation why land take from the opposite side of the road at Rathfarnham Castle is not considered.
- CPO of a large section of the park is fundamentally flawed.
- Negative impact upon woodland sensory playground.

79. Denise Russell (Templeogue Road)

- Query the justification, need and cost benefit of the proposal.
- Concern of CPO of property.
- Concern of deterioration of the aesthetic of the property (removal of mature hedges and shortening of the garden).
- Concern of reduction in the size of the driveway
- Concern of safe access to the road from driveway.
- Concern of loss of trees and mature hedges

- Concern of increased air and noise pollution.
- Concern of devaluation of property.
- Concern of displacement of traffic to surrounding residential streets.
- Concern of increase in traffic volumes.
- Concern for continuous cycle tracks.
- Concern alternative measures to improve public transport have not been considered.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No new issues raised.

80. Deputy Francis Noel Duffy TD and Cllr Mark Lynch

- Concern of extension of an already ineffective dual carriageway at Rathfarnham Road.
- Support Rathfarnham Wood Residents Association submission.
- Concern of impact upon Rathfarnham Castle Park – impact upon bats, biodiversity, natural habitats, woodland.
- Concern of unnecessary CPOs of Rathfarnham Road Residents Gardens.
- Concerns of location of the construction compound at Dodder View Road.
- Concern alternative public transport options have not been explored, extension of Metrolink to SW Dublin must be considered.
- General support for Busconnects CBC Route 12 project.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No New Issues raised.

81. Derek Bradley, Mrs Wallace and Mr and Mrs Paul Jones (Woodview Cottages)

- Concern to the proposed construction compound in the green area between Dodder View Road, Woodview Cottages and Church Lane, Rathfarnham.
- This area was used as a temporary depo for Dodder Greenway works.

- Concern of further disruption and impact from pollution, dust and related health issues.
- Concerns of loss of public amenity.
- Concern of traffic safety and hazard.
- Concern this compound will negate and destroy any environmental benefit that has been created with the construction of the Dodder Greenway.
- Damage to biodiversity (storage of hazardous materials)
- Impact upon residents (dust, traffic, night-time lighting)
- Suggest an alternative non-residential location be explored.

82. Derval O'Brien (Rathgar)

- Concern of flawed public consultation process.
- Concern of impact to non-bus traffic.
- Concern of traffic chaos and congestion.
- Query the need and justification of the proposal.
- Concern of impact to local residents and communities.
- Concern of environmental and ecological impact of the proposal.

83. Desmond Ryan (Rathgar)

- Concern of impact upon character and amenity of Rathgar and Rathmines villages (community, architectural and historical significances)
- Concern of severe traffic congestion on Highfield Road and Villiers Road.
- Concern of traffic safety for residents.

84. Diarmuid McGuinness (Rathgar SC)

- Failure to comply with the Requirements of Annex VI.2 of the EIA Directives and / or Section 50 of the Roads Act, 1993 as inserted by S.I 279/2019
- Failure to study reasonable alternatives.
- Concern of exclusion of the N81 and R137 Harold's Cross Road from consideration, study, assessment and comparison of environmental effects with the chosen route.

- Submission sets out alternative route options and redesign suggestions.
- The chosen route option is fundamentally flawed.
- Justification for not considering the alternative route at Harold's Cross has erred in law.
- The route from Terenure through Harolds Cross into the city centre is a shorter route, is a wider road, has significantly less property on it that may need to be subject to CPO or otherwise and by reason of its width, less construction work to adapt.
- Inconsistency in relation to the proposal for right turn bans and restriction for local residents along Rathgar Road.
- Query the need, feasibility and justification for the project.
- Concern of extinguishment of public rights of way and private rights of way.
- Concern of prohibitory traffic signs and right turn ban esp. off Rathgar Road.
- Concern of adequacy of traffic modelling, reliability of research and survey work.
- Concern of traffic chaos for local residents in Rathgar.
- Concern of proposed Bus gate time restrictions, access for locals, workers and church goers.
- **Request that an OH be held.**
- Submission accompanied with Appendices of written objection to NTA / Busconnects consultations and photos.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Insufficient response.
- Failure to consider and assess reasonable alternatives.
- Lack of necessity and impracticability of making Rathgar Road bus only proceeding southwards.
- Additional photos, of Garville Road, again indicating concern of ability of vehicles passing due to parked cars.

- No new issues raised.

85. Diarmuid O'Brien and Deirdre Healy (Rathgar)

- Question the time saving proposed and the need and justification of the proposal.
- Existing cycling routes are sufficient.
- Concern of environmental pollution, noise, loss of trees and habitats for flora and fauna.
- The widening of TRE would seriously damage architectural amenity,
- Concern of impact upon villages of Terenure, Rathgar and Rathmines
- Ireland needs to fully comply with the 2023 Climate Action Plan

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Insufficient response.
- Concern of justification given data used is out of date.
- Concern of impact upon Rathgar historic residential area.
- No new issues raised.

86. Dolores (Dee) Gaffney (Rathgar)

- Concern of relocation of a bus stop to the front of No. 16 TRE, Rathgar, which is a protected structure.
- Concern of relocation of a bus stop, at No. 34 Terenure Road East to the front of No. 16 Terenure Road East (TRE) (which is a protected structure) in terms of traffic safety, health, privacy.
- Concern the Bus Stop would be too close to the junction, this would cause flow of traffic to be blocked.
- Concern of creation of a traffic hazard due to inadequate footpath width.
- Concern that access to the driveway of No. 16 will be impeded.
- Lack of consultation
- Relocation for bus stop is inappropriate for passengers, residents, local businesses or other vehicle users. It was previously moved from the front of No. 12 TRE to its current location at No. 34 TRE due to issues arising.

- Concern of impact upon built heritage and protected structure status.

87. Dr. Roderick Maguire and Dr. M.E.Maguire

- Concern of traffic congestion on Highfield Road.
- Recognise the laudability of the project.
- Concern justification and need for the project in light of changing work patterns.
- Concern of proposed Bus gate at St. Mary's College and the one way inbound traffic on Rathgar Road.
- Concern of traffic displacement and safety for residents.
- Concern of traffic chaos and congestion.
- Concern of impediment of access to St. Luke's Hospital.
- Query the need and justification of the proposal on environmental grounds, loss of trees, impact to historic and protected structures.
- Concern of impact to local residents and communities.
- Query the lack of consideration of alternatives.
- **Request that an OH is held.**

88. Dublin Commuter Coalition

- Support Busconnects project
- Project route requires redesign.
- Need for enforcement and cameras to ensure enforcement.
- Bus lanes and Bus gates should be operational 24/7 hours.
- Two stage crossings for pedestrians should be omitted.
- Pedestrians need to be prioritised and junctions need to be in compliance with DMURS.
- Concern of safety of bus stop design and width of bus stop islands.
- Cycle track running in front of bus shelters should not be permitted.
- Shared space for pedestrians and cyclists causes conflict and is of concern.
- Concern that cycle parking provision is not included in the proposal.
- Location of cycle lane to the front of the bus shelter at Nutgrove / Rathfarnham Wood Junction should be redesigned.
- Noncontinuous cycle lane at Grange Road / Willbrook Road Junction should be redesigned.
- Cycle track should run behind the bus shelter at Rathfarnham Road / Main Street Junction.

- Priority signals for cyclists should be incorporated at Rathfarnham Road / Dodder Park Road Junction.
- Pedestrian crossing should be provided on the eastern arm of the junction at Rathfarnham Park / Rathfarnham Road Junction.
- Consideration of a modal filter on Ferguson Road to discourage rat running to and from Templeogue Road.
- Need for a pedestrian crossing at Beechlawn Way
- Cycle lanes on Terenure Place and TRE should remain.
- Request that a continuous footpath is provided at Terenure Road East / Aldi Entrance.
- Camden Street Junction and Charlotte Way Junction should be adjusted to a traditional T-junction.
- Recommends adjustment to South Great Georges Street Bus Stop to prevent conflict between pedestrians and cyclists.
- Request traffic calming measures are provided at Bushy Park
- Request pedestrian crossing be included on all arms of Templeogue Road / Old Bridge Road Junction.
- Request that more traffic calming be included in the Templeogue Road area to ensure drivers share the space safely.

89. Dublin Cycling Campaign

- Support for the scheme.
- **Request an OH**
- Needs to ensure that the needs of the large 'interested but concerned' cohort of cyclists are met to provide modal shift.
- Concern all works are compliant with universal design for cycling.
- Welcome design interventions such as Bus gates, amendments to the scheme, improved island bus stops, conversion of Spawell roundabout to a signalised junction, introduction of cycle facilities on Terenure Road North and Harold's Cross Road.
- Consideration needs to be given to cycle track widths – minimum 2.0m
- Consideration of cycle track continuity (Rathfarnham Road weak).
- Filtered permeability is a welcomed approach.
- Quiet Street Treatment should include reduced width and speed of the carriageway.

- Dutch Guidance as per CROW Design Manual for Bicycle Traffic should be adhered to.
- Welcome the role out of 30 Kph speed limits.

90. Dylan Timbs (Rathfarnham Road)

- Fundamentally Object to the proposal
- **Request that an OH be held.**
- No. 63 Rathfarnham Road will be affected by CPO Plot List 1073(1).1d, 1073(2).2d. Removal of 23.7 sq. m of front garden.
- This submission raises the same grounds as Brendan Timbs submission, summarised above at No. 38 of the submissions. It relates to the same address - No. 63 Rathfarnham Road.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Insufficient response by the NTA to submission
- Rubber stamping exercise – withholding of information is a desperate disservice to NTA and a damning mantle of ABP.
- Concern no OH was held.
- Accompanied with updated letter from NRB Consulting Engineers re: breach of Part M
- Additional submission raises the same grounds as Brendan Timbs and Elaine Timbs’s submissions. It relates to the same address - No. 63 Rathfarnham Road.
- No new issues raised.

91. Eamon Kelly (Terenure Road West)

- Concern of CPO for a scheme that has not yet received planning permission.
- Fundamentally object to the proposal.
- Object to the inclusion of the CPO of properties between Beaumont House and St. Joseph’s Church.
- Concern of justification, need for the scheme and lack of consideration of alternatives.
- Concern of lack of a proper public consultation process.
- Concern of wide ranging negative impacts for local communities.

- Concern of traffic chaos, loss of mature trees and historical features.
- Concern of impact to local businesses

92. Eileen Dolan

- Concern of justification and need for the project.
- Concern of impact to locals, communities and businesses particularly in Rathgar, Terenure, Rathmines and Ranelagh.
- Concern of lack of park and ride facilities.
- Concern of lack of consideration of alternatives.
- Concern of traffic displacement and chaos.
- Concern of access to schools, clubs, churches, leisure centres and other amenities.
- Concern of loss of trees.
- Concern of bus gate time restrictions.
- Concern of pedestrian and cyclists' safety.
- Concern of lack of testing of the proposal.

93. Eimear O'Broin (Fortfield, Drive Terenure)

- Queries the need and justification of the project.
- Concern of incentives to be put in place to increase bus use.
- Concern of access to schools, discussion and consultation with schools and residents generally.
- Concern time saving is not sufficient to warrant the project.
- Concern of no right turn ban at junction of Fortfield Road and Templeogue Road.
- Concern of continuous nature of the bus route.
- Concern bus stop at Terenure College is being relocated.
- Concern of footpath width and pedestrian safety.
- Concern for needs of the elderly and disabled.

94. Elaine J. Wright (Templeogue Road Terenure)

- Concern of justification of the scheme.
- Concern city's aging population and physically disabled has not been considered.
- Concern families with children not considered.
- Concern of impact upon historical and architectural heritage.

- Concern of the role of natural (green) environment in the reduction of carbon dioxide levels and combating climate change.
- Concern time saving is not significant enough to change behaviour.
- Concern bus stops are being removed or relocated.
- Concern cyclists are prioritised over pedestrians.
- Concern for pedestrian safety
- Concern of loss of mature trees
- Concern of impact upon stone wall and plaque along the green space of Rathdown Drive

95. Elaine Timbs (Rathfarnham Road)

- Fundamentally Object to the proposal
- **Request that an OH be held.**
- No. 63 Rathfarnham Road will be affected by CPO Plot List 1073(1).1d, 1073(2).2d. Removal of 23.7 sq. m of front garden.
- This submission raises the same grounds as Brendan Timbs and Dylan Timbs's submissions, summarised above at No. 38 and No. 90, respectively, of the submissions. It relates to the same address - No. 63 Rathfarnham Road.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Insufficient response by the NTA to submission
- Rubber stamping exercise – withholding of information is a desperate disservice to NTA and a damning mantle of ABP.
- Concern no OH was held.
- Accompanied with updated letter from NRB Consulting Engineers re: breach of Part M
- Additional submission raises the same grounds as Brendan Timbs and Brendan Timbs's submissions. It relates to the same address - No. 63 Rathfarnham Road.
- No new issues raised.

96. Emmanuel Kehoe and Dr. Attracta Halpin (Fortfield Drive)

- In principle support the project.
- Concern about the efficiency of the project.
- Concern of impact to local residents &, students.
- Concern of access to services and facilities.
- Concern of fewer bus stops
- Concern of impact upon community and creating a non-place.
- Concern of impact to older residents and people with disabilities.
- Concern of justification of the project and alternatives considered.

97. Eoin and Liadh Ui Chinneide and Nail and Amy Adams (Rathfarnham Mill – Construction Compound TR3)

- Concern of location of construction compound TR3
- Concern of impact to residential amenity.
- Concern of loss of a valuable recreational area.
- Concern of impact upon the environment, loss of biodiversity, wildlife habitats.
- Concern of pollution impacts and air quality deterioration.
- Lack of adequate consultation with locals.
- Failure to consider viable alternatives.

98. Eve McMorrow (Walkinstown – Rathfarnham Castle Park)

- Concern of impact upon Rathfarnham Castle Park
- Concern of excessive land take
- Concern of impact to users of the park, in particular autistic and neurodiverse children.
- Concern of negative environmental impact, loss of biodiversity and wildlife habitats.
- Proposals to widen the Grange Road over a substantial part of the woodland area of Rathfarnham Castle Park is excessive and unnecessary.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No new issues raised.

99. Feidhlimidh Wrafter (Fairfield Park, Rathgar)

- Do not support the proposal for the reasons set out in the submission made by the Rathgar Residents Association dated 17th June 2023.

100. Fergal Bolster and Others (Rathfarnham Road)

- Owners / Occupiers of 42, 44, 46, 48 and 50 Rathfarnham Road, Terenure
- Concern the EIAR is deficient in describing and assessing only part of what is a wider project in material non-compliance with the requirements of the EIA Directive.
- Concern it is not possible for the Board to carry out an adequate environmental impact assessment of the proposed scheme on the basis of the EIAR.
- Concern legal principals have not been complied with in relation to the compulsory acquisition of private property as identified by the Supreme Court in Reid v Industrial Development Agency [2015] 4 IR 494:
 - Not justified or necessary.
 - Not proportionate.
- Concern of impact upon community, social and safety reasons within urban villages.
- Negligible time savings (for bus commuters travelling in either direction between Bushy Park Road and Terenure Road North) do not justify the project and its proportionality.
- Concern the impact on private property has not been adequately described or assessed as required by law when considering the preferred route option or any alternative option.
- Concern of dangers for property owners entering and exiting their properties, due to new road layout, and for the cyclists, pedestrians and motorists they will have to negotiate.
- Concern of access to schools, sports, shops, amenities, social events for local residents.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Insufficient response.

- Failure to carry out adequate an EIAR
- Lack of justification of CPO of private lands.
- Failure to meet requirements of constitutional test.
- Unsuitable development in an urban village.
- Concern of amendments to front driveway, safety and ability to carry out turning manoeuvres.
- No new issues raised.

101. Filipa Allen Egan (Mountpleasant Avenue Lower)

- Concern of chronic traffic issues on Mountpleasant Avenue Lower.
- Support the proposed closure of the junction from Richmond Hill to Mountpleasant Avenue Lower.
- This road closure measure would improve the current overload of traffic on Mountpleasant Avenue Lower and would support the bus connect infrastructure.

102. Fiona Burns (Rathfarnham Road)

- Concern with relocation of Bus stop 1334 to outside No. 95 Rathfarnham Road – antisocial behaviour, nuisance, loitering, graffiti etc
- Concern of impact to young children living at No. 95
- Current location of the bus stop is preferable from a traffic, pedestrian and cyclists safety and pedestrian accessibility viewpoint.

103. Fiona Connolly (Villiers Road Rathgar)

- Concern of impact of road closures, (in particular, of Rathgar Road to outbound traffic)
- Concern of introduction of right-hand turn at intersection of Rathmines Road and Highfield Road
- Concern of new bus routes onto Highfield Road.
- Concern of traffic displacement
- Concern of level of traffic on Highfield Road
- Concern of adequacy of survey work and analysis of data with respect to additional traffic on Highfield Road.
- Concern of traffic safety and hazard.
- Concern of lack of consultation – The Aarhus Convention
- Concern of decision to change original plan on Rathgar Road without seeking input from those affected by the changes.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Insufficient response.
- Concern of increased traffic on Highfield Road due to turn bans.
- Lack of consultation.
- No new issues raised.

104. Fiona Daly (Rathgar Road)

- Question the justification and need for the project.
- Concern of traffic congestion.
- Concern of impact upon community in Rathgar.
- Concern of lack of consideration of alternatives, incl. more capacity on the Luas, school buses for children, congestion charges.

105. Fiona Eogan (Rathdown Park)

- Concern of COP of lands on Terenure Road East
- Concern of loss of trees
- Concern of severe traffic congestion
- Concern of Bus gate on Catholic church in Rathmines
- Concern of justification and need for the project.

106. Fiona Reilly (Terenure)

- Concern of accuracy and adequacy of traffic modelling - modal shift, how it has been applied and how journey types for residents in the area will be accommodated.
- Concern of accuracy of traffic counts and purported dissipation of traffic at Templeogue\Fortfield area.
- Concern of reduction in current Bus service on Templeogue Road.
- Proposed Bus gate and right-turn bans on Templeogue Road and the Spawell junction reconfiguration.
- Concern of overlay of orbital routes.
- Concern of changes in access to community\commercial concerns, Bushy Park, Terenure Rugby Club, commercial centres, emergency vehicles access.
- Environmental concerns. Loss of trees and CO2 emissions.
- Lack of Cost Benefit support for proposal
- Safety concerns, school children
- Concern of impact upon commercial traffic.

- Concern of construction & design of adjacent roads.

107. Fionnuala and Dick Blake (Terenure)

- Supportive of submission made by the Terenure Residents association (TRA)
- Query the justification, overall approach and evaluation process.
- Concern of accuracy and adequacy of traffic modelling - outdated.
- Concern of assessment and analysis of impacts on roads, residents and commercial interests.
- Concern of displacement of traffic.
- Concern of negative environmental impact.
- CBA, proportionality and time saving queried.
- Concern alternatives, with less invasive structural changes, have not been properly considered each of Building Regulations Part M – CPO affecting the west side of Rathfarnham Road
- Concern of impact to built heritage.
- Concern of lack of proposal for park and ride facilities.
- Concern of Bus gate times proposed.
- Concern of traffic chaos, congestion and impact upon residents from right turn bans.
- Concern of impact upon public realm, narrowing of footpaths esp. outside the PO / Centra on TRN

108. Frank O’Callaghan (Rathdown Drive Terenure)

- Supports the submission made by Senator Mary Seery Kearney

109. Gavan Maguire (Greenlea Road)

- Supports Busconnects
- It is critically important that the right-hand turn ban onto Greenfield Road from Fortfield Road is agreed and enforced.
- Suggest bollards be trialled for use, to enforce a one-way system.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Insufficient response.
- Failure to consider reasonable alternatives presented for Greenlea road.

- Concern of length of time involved to enforce turn bans, by way of cameras.
- No new issues raised.

110. Graham Brooks and Jennifer Porter (Victoria Road Rathgar)

- Concern of traffic chaos.
- Concern of Victoria Road becoming a rat run.
- Concern of access to services, villages and M50
- Concern of understanding of local issues.
- Concern of adequate modelling.
- Concern of environmental impact.
- Concern of loss of trees.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No new issues raised.

111. Grainne O'Neill and Others (Rathgar)

- Concern of justification of the scheme
- Support improvements to Bicycle lanes and public transport
- Concern from an environmental, heritage and safety perspective.
- Concern of loss of biodiversity and trees
- Concern of impact of CPO on Terenure Road East and displacement of traffic.
- Concern of lack of considerations of alternatives, incl. implementing congestion charges, park and ride and underground Metro.
- Lack of consideration of the impact of all of the 12 proposed bus corridors, EIAR deficient.
- Concern of impact upon Rathgar Village and community – impact of Rathgar Road being one way is draconian.
- Concern of inadequate public transport service for Harolds Cross Road.
- Concern of flawed initial premises, traffic modelling and counts and analysis.
- Cost benefit analysis is flawed. Significant cost to community.
- Concern of non-continuous cycle lanes.
- Concern of lack of park and ride facilities.
- Concern of operation of bus gates.
- Concern of flawed public consultation.

- **Considers that an OH would benefit the project.**
- Bus stops removed will shorten journey times:
 - Rathmines Park inbound and outbound removed
 - Bus stop at Garville Avenue inbound removed to Winton Avenue
 - Outbound bus stop at Brighton Road removed
 - Inbound bus stop near Brighton Road moved to Rathgar Village
- Concern of impact to elderly and disabled access.
- Concern of diminished access to services, St. Luke's hospital, doctors, parks, sports facilities and playgrounds
- Concern of impact upon heritage and Bushy Park.
- Concern of right turn bans and access to Church in Rathmines

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No new issues raised.

112. Greg and Audrey Turley

- Loss of mature trees on private lands.
- Concern of loss of trees not identified on the NTA maps.
- Concern for impact upon biodiversity and climate change.
- Concern of impact upon residential amenity both during and post works.
- The data used by the NTA in the Environmental Report is outdated.
- Query the legitimacy of the CPO procedure in advance of a grant of planning permission.
- Query the need and justification for the proposal.
- Concern of impact to built heritage along Terenure Road East.
- Consultation process pertaining to CBS has been unfair and undemocratic.
- Concern of impact upon historic heritage villages and communities.
- Information available is technical and not easily understandable in lay – man's terms.
- Query the cost effectiveness and robustness of the plan. A CBA is required. Especially in light of post Covid and changing environment.
- New Right turn at Terenure Cross from Rathfarnham Road towards Rathgar via Terenure Road East needs to be reconsidered.
- Concern of loss of car parking.

- Concern to cycle arrangements proposed. Diversions are not credible.
- Concern of spill over traffic and diverted traffic flow on local roads.
- Full implications of the bus gate and one-way system proposals needs to be assessed.
- Vulnerable elderly people affected by possible CPO's.
- Integrated traffic modelling for each of the routes Templeogue / Rathfarnham to city centre, Kimmage to city centre and Tallaght / Clondalkin to city centre is required.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No new issues raised.

113. Grove Park Residents Group (Grove Park)

- Concern of impact of bus gate in Rathmines
- Concern of effect on access and egress to residents, businesses and service deliveries.
- Concern of time restriction of bus gate proposed 6am – 8am 7 days a week.
- Concern of public consultation process to date.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Insufficient response.
- No new issues raised.

114. Helena McLoughlin (Highfield Road)

- Concern of displacement of traffic
- Concern of traffic congestion on surrounding roads.
- Concern of noise, emissions, traffic danger, access and egress to homes, schools, shops etc
- Concern if impact upon community.

- Concern of devaluation of property
- Concern of impact upon residential amenity
- Concern CBA and EIA deficient.
- Concern of impact upon property rights
- Concern of destruction of built heritage and protected structures
- Concern of lack of realistic consultation with locals.

115. I Love Terenure 2030 (Terenure)

- Welcome the improvement in public transport
- Query the justification and CBA of the project
- Concern at modest time savings.
- Concern of lack of assessment of alternatives such as Metro.
- Concern of impact upon local traffic and services.
- Concern the 24-hour bus gate on Templeogue Road will likely lead to redistribution of trips and rat running.
- Lack of foresight about trade and employment.
- It is vital that information is provided on:
 - The routes that all buses will take through the city centre
 - The volume of buses that will be involved
 - The measure required to achieve the required throughput of buses.
 - The implications of these measures
- Concern of relocation and removal of bus stops
- Concern of flawed modelling counts
- Concern of impact upon trade in villages and supermarkets
- Concern of timings of Bus gates
- Concern of creation of circuitous routes for locals – access to PO and St. Pius X church.
- Concern creation of longer journey times, extreme traffic and environmental issues.
- Concern of impact of right turn bans and creation of rat runs.
- Concern of flawed consultation and initial premises.
- With the proposed bus gates 24/7, 6am - 8pm Local Businesses will become unviable.
- Question the ability of buses to be able to meet existing demand and the growth requirements.
- Concern of destruction of built heritage esp. of Terenure village.
- Concern of flawed public consultation.

- **Requests that an OH be held.**

116. Irelands Autism D6 – D6W and Surrounds

- Concern of impact upon Rathfarnham Castle Park.as a large number of local autistic children love the peace and natural environment of the Woodland Playground.
- Concern that such an important resource for local families will be negatively impacted.
- Concern of impact upon the Glin River/ Whitechurch Stream.
- Concern that IFI was not given proper opportunity to comment.
- The cumulative effects of upstream development on the Glin River have not been addressed.
- Concern that the proposed road widening works would take place directly over an open river which is an important wildlife habitat and which is hydrologically connected to both the Owendoher and the Dodder.
- Concern of failure in terms of hydrological and hydrogeological assessments.
- Concern the new road, with its noise, smells and pollution, will be so much closer to the play area and the surrounding trees, bushes and undergrowth will have been lost.
- Concern that the playground will no longer meet the sensory needs of our children who love its peace, tranquillity and sense of being out in nature.
- Concern of impact upon biodiversity and wildlife.
- Support the Rathfarnham Wood Residents Association submission
- The bus corridor should terminate at the end of the Rathfarnham Village bypass (by the Butterfield Avenue junction). A signal-controlled priority light would provide sufficient priority for the limited number of outbound buses which pass Rathfarnham Castle Park.
- Vtally important a unique amenity for local autistic children is protected.

117. Irelands National Autism Charity (Involve Autism)

- Concern of substantial widening of Grange beside the woodland playground and natural play space in Road Rathfarnham Castle Park.
- A large number of local autistic children love the peace and natural environment of the Woodland Playground.

- Concern a unique vitally important, peaceful, nature filled haven / space for physical, mental and emotional wellbeing of local Autistic children will be lost / impacted.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Insufficient response to concerns raised re Rathfarnham Castle Park.
- Failure to consider the physical, mental and emotional wellbeing of local autistic children.
- No new issues raised.

118. Ivana Bacik TD

- Support for the scheme, which represents a key step towards improving public transport and cycling infrastructure along this busy route.
- Supportive of plans for improved bus services, the increased provision of safe cycle lanes and active travel infrastructure.
- It is of great benefit generally to see plans for the development of a cleaner, quieter, more sustainable environment for everyone living and working in the area covered by this scheme.
- Support Increased frequency of buses, and reduced journey times on public transport.
- Strongly supportive of the move towards metro and light rail transit for Dublin.
- Welcome the implementation of a bus corridor on Rathmines Road for the benefit of all. In particular, the implementation of segregated cycle lanes along the route will lead to a significant improvement to cyclist safety, and should encourage more people to use bicycles on a regular basis. Any changes to routes along Rathmines must also ensure continued safe access for those with impaired mobility to all the amenities and public buildings along this busy route, like medical services, shops and restaurants, cinemas and leisure amenities, Swan Leisure, the Swan Centre, Rathmines church and other venues.

- Concern of impact upon residents of Fortfield Road, Terenure Road West and adjoining roads due to new turning restrictions, suggest that the provision of 'local access' arrangements would be very helpful to address this issue.
- Concern of impact upon residents of Greenlea Road, and the Terenure Road West area, which is already a dangerous and busy road, particularly for cyclists.
- Concern of impact of construction on local communities, communication and liaison with DCC and local residents during the construction period.
- Concern for protection of biodiversity.
- Note the concerns of Rathfarnham Wood Residents' Association
- Express concern about the level of fee required to make a submission on this consultation process.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No new issues raised.

119. Jack Thornton (Terenure Road East)

- Concern of CPO of private property on Rathgar Road.
 - Loss of curtilage, mature trees and front gardens at protected structures
 - Serious permanent damage to the character of the retained lands at each PS where land is acquired.
 - Destruction of architectural heritage and historic fabric.
 - Creation of a bus highway through a residential conservation area
 - Reduced front gardens endanger safe movement of cyclists and pedestrians.
- Concern of destruction of a Conservation Area and Dublin's built heritage. Contrary to Dublin City Development Plan and Z2 zoning objective and conservation policy.
- Concern of failings within the EIAR
- The Feasibility Study is flawed.

- The route selection process appear imbalanced in favour of the emerging preferred route corridor.
- Concern Harold's Cross Road was disregarded at an early stage.
- Concern with regard to reasonable alternatives considered for cycle lanes and bus lanes.
- Concern of non-segregated bus and cycle lanes within this CBC
- Note ABP refused to approve the proposed civic plaza and ancillary traffic management measures at College Green due to not being satisfied that the impacts of the proposal were adequately assessed.
- Concern of the shortcomings in the route selection process.
- Concern of pinch points along the route and non-continuous bus lane in Terenure and non-continuous dedicated cycle lane.
- Concern of conflict between cyclists and motorists.
- Concern of loss of resident's car parking spaces, restricted entry and egress for property owners parking cars to the front of their properties.
- Concern of conflict with safe movement of pedestrians on footpaths, cyclists on the nearest lane and the free flow of buses passing at increased frequency.
- Consider the principal route through Harold's Cross may be preferable with a segregated cycle lane on TRE / Rathgar Road would create an attractive safe cycling route to and from the city
- Suggests an alternative route for core bus corridor 12TRN could be improved to accommodate bus lanes and passes virtually no PS.
- Separate alignments of cycle routes and bus lanes have potential to improve cycling safety and avoid or minimise road widening thus reducing CPO and avoidance of permanent damage to the architectural heritage of the area.

120. James and Cora McEntee

- Object on the grounds that no consideration has been given to the impact of the return traffic from town on the residential areas that traffic will have to pass through.

121. James Dwan (Victoria Villas Rathgar)

- The submission reiterates the submission by Senator Mary Seery Kearney, also submitted by Frank O'Callaghan.
- **Requests an OH is held.**

122. James M. Bourke and Ilona de Burgh:

- Concerns in relation to impact along Terenure Road East, in particular from No. 53 to No's 73 – 75 road widening is not justified.
- Object to destruction of Terenure village character, impact upon mature trees and natural habitats, protected structures, original railings, front gardens and stone boundaries.
- Concern of the environmental impact of the scheme
- Harmful effect of pollution on health
- Concern with increased heavy traffic volume.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No new issues raised.

123. Jaqueline Murphy (Ranelagh)

- Concern of the bus gate at St. Mary's school on Rathmines Road.
- Concern of impact upon the Parish Church in Rathmines.
- Concern of access for elderly and disabled access for parishioners, in terms of drop off and parking.

124. Jason Devine and Others (Rathfarnham Construction Compound TR3)

- Concern to the proposed construction compound in the green area between Dodder View Road, Woodview Cottages and Church Lane, Rathfarnham.
- This area was used as a temporary depo for Dodder Greenway works for the last 3 years.
- Concern of further disruption and impact upon residents (noise, dust, traffic, night-time lighting)

125. Jean Murray (Church Lane, Rathfarnham, Constriction compound TR3)

- Concern to the proposed construction compound in the green area between Dodder View Road, Woodview Cottages and Church Lane, Rathfarnham.
- Concern of impact upon residents due to proximity (noise, dust, traffic)
- Concerns of loss of public amenity.

126. Jim Byrne (Rathmines)

- Concern of traffic chaos
- Concern of Bus gates proposed times beyond / outside of rush hour peak traffic times.
- Concern of impact to lives of locals and communities / villages.
- Concern of traffic displacement to surrounding residential roads unsuitable for large traffic volumes.
- Concern of impact of bus gate at St. Marys College and lack of detail on the Portobello La Touche Bridge situation.
- Concern of impact upon trade and businesses and commercial traffic.

127. Jim O'Callaghan TD

- Concern that the proposal is proportionate and appropriate for the purpose of achieving modest bus journey time savings.
- There needs to be a balance against the potential detrimental impact that the proposal would cause.
- Concern wider and larger thoroughfares will result in increased vehicular traffic giving rise to increased carbon emission.
- Concern of noise, loss of trees, unnecessary CPO of property and inconvenience to many communities by limiting people's ability to access their homes in the most efficient manner.
- Concern of loss of trees, removal of front gardens, and proposal for replacement.
- The bus gate at St. Mary's College will be a major inconvenience for people living in Grove Park, parishioners of Church of Mary Immaculate Refuge of Sinners.
- The bus gate on the eastern side of Templeogue Road as it enters into Terenure will inconvenience the people living in Olney Crescent / Olney Grove and Fergus Road
- Concern of CPO of properties on Rathfarnham Road and TRE
- Concern of impact upon urban villages and Highfield Road.
- **Request that an OH be held.**

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Concern of traffic restrictions through Ranelagh

- Proposed changes were not part of the initial proposal and were never identified in any detailed way in the initial plans.
- Restricting right and left turns onto Ranelagh Road are excessive and disproportionate.
- Concern of impact on residents in the locality and longer car trips.

128. Joan Kelly (Mountpleasant Avenue)

- Support the Busconnects project.
- Agree with proposed hours for Bus gate over a seven-day period.
- Propose that a small roundabout be created at the junction of Mountpleasant Avenue Lower and the canal to permit cars travelling in an easterly direction to turn back to access Rathmines Road Lower.
- Propose a dual bicycle lane be created on the western side of Rathmines Road Lower.
- Propose the left turn from Rathmines Road Lower into Castlewood Avenue be reinstated.
- Agree with proposed right-hand turn ban from Leinster Road onto Rathmines Road Lower
- A right hand light is needed at Clanbrassil Street Bridge.
- Request that a 30 kph speed limit restriction for cars and e-bikes be introduced on Rathmines Road Lower and Upper.
- Support the introduction of bollards at Corrigans Pub on Mountpleasant Avenue Lower.

129. Joe Davitt

- Concern of proposed hours of use of the bus gate on Rathmines Road Lower, between 6 am and 8 pm seven days a week, impact upon access for residents to their property, emergency services, deliveries, construction works, bin trucks etc
- One new loading bay proposed on Rathmines Road Lower, however, it is unclear who can use the loading bay.
- Concern of access for deliveries and tradespeople.
- Concern with further parking and traffic restrictions on the Lower Rathmines Road there will be fewer places to park for local residents.
- Pay and display spaces will be removed from Military Road which causes problems for residents – query the need for residents only parking.

- Local residents on Lower Rathmines Road should have access through the bus gate by way of electronic tag system.
- Concern that drop off to school patterns will not change.
- Cycle lanes will have to have speed limits for e.scooters and electric bikes.
- Concern of impact to businesses
- Concern of need and justification of the project esp. the operation times proposed for bus gates.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No new issues raised.

130. John Gleeson and Christine Blessing (Rathgar)

- Concern of displacement of traffic, esp. Wasdale and Glenayre.
- Concern of lack of clarity for access for local residents to Rathmines, Dublin city centre and M50
- Concern of complexity of the route
- Concern of environmental impact and removal of trees on TRE
- Concern of traffic chaos in Rathgar.
- Concern of impact upon businesses in Rathagr Village.

131. John Grant (Terenure)

- Concern of impact of 30 kph speed limit from Rathfarnham Road to city centre.
- Concern of introduction of 'quiet cycleway' along Wasdale Park / Grove and Victoria Road – for safety reasons due to narrow width of roads.
- Concern for cyclists' safety due to parked cars and limited sightlines / visibility from driveways along Wasdale Grove.
- Bushy Park Road and Zion Road are wide enough to accommodate cycle lanes in addition to vehicular carriageways.
- The destination / origin for many cyclists will be children cycling to / from the High School on Zion Road (800 pupils) or Zion NS on Bushy Park Road (120 pupils) both only accessible by cycling along either Zion Road or Bushy Park Road. Safer option to make these roads cycle friendly.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Removal of on street car parking on Bushy Park Road and Zion Road would improve cyclist safety.
- No new issues raised.

132. John Lahart TD

- Attempting to create traffic advantages for buses makes sense.
- Concern of safety for roads users
- Concern of prudent use of public funds
- Concern of over engineering of the route
- Support the need to address Dublin's chronic traffic congestion
- Acknowledge the many public consultation meetings held by the NTA
- Many younger people have expressed support for the project but note that few young people attended the public meetings.
- Submit that it is imperative that ABP pay close attention to the smallest details contained in the NTA proposal and interrogate each accordingly.
- The public recognises change is needed, but many of the concerns raised are valid and need to be addressed.
- Concern Active Travel Section of Local Authorities should be liaised with.
- Community submissions and concerns of businesspeople and traders especially in Terenure need to be looked at carefully.
- Support the submission by WORK Residents Association, Orwell Park (Templeogue Residents Association), Rathfarnham Wood Residents Association.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Concern no OH held.
- Public cynicism with regards to the attitude of the NTA to public consultation.
- Public confidence in the planning system is at stake.
- Concern of impact on local Rathfarnham residents.
- No new Issues raised.

133. John Perham and Valerie Henderson (Templeogue Road)

- Concern of traffic impact and access to services, community, amenities and shopping.
- Concern of longer and more circuitous car journeys for residents.
- Concern of environmental damage and loss of trees.
- Concern of justification in terms of journey time savings achieved.
- Concern of operation time of bus gate close to Olney Crescent.
- Concern of needs for elderly and disabled.
- Concern of access for emergency services

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No new issues raised.

134. John Shanahan (Templeogue)

- Concern the scheme has not been designed to take account of disabled users of cycling infrastructure incl. tandems, wheelchair cycles, hand cycles, trikes, cycling without age trishaws and cargo bikes.
- Concern DMURS is not adhered to in the scheme.
- Separating cycle tracks and footpath crossings from general traffic lanes could help to reduce road crossing widths and delays.
- Concern of proposed traffic calming for cyclists.
- Concern bus stop review is not up to date.
- Concern RSA not up to date.
- Concern Parking report is not accurate.
- Concern that walking and cycling provision is not facilitated at all arms of signalised junctions.
- Concern of proposed junction cycle times and consistency with DMURS
- Concern of junction crossing times for pedestrians.
- There is a need to complete a walking and cycling assessment for each junction along the scheme, to adequately assess time for walking and cycling.
- Concern baseline description of existing cycling infrastructure is incomplete and inaccurate.
- Concern there are inaccuracies and errors in relation to drainage and catchments.

- A footpath and segregated cycle track is required along the south side of the R137 linking the Spawell junction to the southern side of the M50 junction.
- Imperative that active travel is given a high priority at Spawell junction.
- Existing two-way cycle track between Rossmore greenway and Spawell should be retained.
- Concern of design of Spawell Junction to Cypress Road.
- Concern of design of Templeogue Bridge Junction (pedestrian crossings and cycling prioritised)
- Concern of bus stop locations, distance between and relocation of stops.
- Concern of stacking of vehicle congestion and bus movements.
- Concern of consideration of reasonable alternatives for segregated cycle facilities esp. from Cypress Gove Road to Springfield Avenue.
- Concern the proposal is not in line and differs from the Templeogue Village and the TVI Part 8
- Concern of inconsistencies in red line boundary markings on drawings and description of the development.
- Concern adjacent infrastructure is not shown / detailed as required:
 - Two sets of pedestrian crossing lights within Templeogue Village are omitted.
 - Drainage omissions
 - The layout shown in Templeogue Village is not fully what was built.
 - The drawings do not make clear what infrastructure is existing or proposed.
 - The footpaths are shown incorrectly,
 - Parklets not shown
 - Street furniture and signs not shown
- Concern that the proposal is not in line with the DMURS or the National Cycle Manual (NCM)
- A priority crossing should be provided for walking and cycling across Rathdown Avenue.
- A segregated cycle track should be provided on the inbound lane on Rathdown Park where it meets the R114
- Provision needs to be made to ensure people cycling inbound can travel from Rathdown Park and Rathfarnham Road onto Bushy Park Road.

135. John Walsh (Mountpleasant Avenue)

- Supportive of the overall project.

- Concern proposal fails to deliver a future proof mobility model for Rathmines
- Concern proposal fails to take into account future increased pedestrian and cycle traffic.
- Concern of compliance with DMURS and with the Greater Dublin Area Cycle Network Plan (GDACNP).
- Concern lost opportunity to improve public realm in Rathmines
- Overall design engineering lead.
- Consider the scheme should be approved subject to:
 - Slower speeds for vehicles – 30 kph – design measures that support the reduction of traffic speeds, should be subject to condition.
 - Concern of dimensions of footpaths – a review of the relationship between cycling, bus and pedestrian infrastructure should be conditioned.
 - Make compliance with the minimum standards for road design (DMURS) and widening of footpaths as required on Mountpleasant Avenue Upper a condition of planning approval.
- Concern cycle infrastructure is deficient, and no consideration has been given to how secondary cycle routes as well as feeder routes will be integrated.
- Request that a disability audit and review of the pedestrian impact is a condition of permission.
- Concern of operation of the bus gate in Rathmines and access for locals. Consideration should be given to 'local access' automated system based on the technology that is used by toll roads for the area between Military Road and the Canal.
- Concern for local access to Rathmines Church, St. Mary's day centre and Meals on Wheels.
- Concern of vehicles mounting footpaths due to the road's dimensions at Mountpleasant Avenue Upper.
- Request that the reintroduction of two-way traffic on Mountpleasant Avenue Upper is rejected.
- Support the submission by residents of the Mountpleasant area.
- Local access to and from Rathmines Road could be enhanced by having a right turn onto Rathmines Road from Castlewood Road and a left-turn from Rathmines Road onto Castlewood.
- The proposed 'no right turn' from Cullenswood Road onto Ranelagh Road should be carefully evaluated as this restriction will result in considerable detours.

136. Judith Lunny (Rathgar)

- Concern of destruction of built environment, community, visual amenity.
- Concern of traffic congestion and pedestrian safety.
- Concern of traffic displacement to surrounding residential streets.
- Concern of justification of the project from a time saving perspective.
- Concern of impact upon businesses.

137. Karen Lynch (Rathfarnham Wood)

- Object to CPO of 8 Rathfarnham Wood Plot List 1016(1).1(d), 1016(2) 2d
- Object to CPO of Woodland area of Rathfarnham Castle Park Plot list 1001(1).1f; 1001(2).2f.
- Concern of impact to rear garden, lands sought to be acquired is 2sq.m and the lands sought temporarily is 23sq.m
- This submission raises the same concerns as the submission by Mary O'Mahony at No. 9 Rathfarnham Wood summarised below (under 167).

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No new issues raised.

138. Karen Quirk (Rathmines)

- Support enhanced public transport
- Concern of displacement of traffic and traffic chaos.
- Concern of justification of the project.
- Concern of time restriction of the bus gate on Rathmines Road
- Concern of impact upon community and urban villages.
- Concern of traffic congestion on roads in Rathmines and road safety particularly at junctions.
- Concern of impact to children attending St. Louis High School on Charleville Road.
- Concern of environmental and legal issues
- **Request that an OH be held.**

139. Kathryn and Eoin McVey (Rathgar)

- Concern of justification for the project.
- Concern of negative impact upon peoples lives
- Concern of major congestion of Rathgar
- Concern of traffic displacement and impact upon surrounding streets.
- Concern that time saving is inconsequential for the cost and disruption.
- Concern of accuracy of information and data.
- Concern cumulative impact of all bus connects schemes not carried out.
- Concern Aarhus Convention not taken into account.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Response by the NTA is inadequate.
- An OH should be held.
- Public consultation at an early stage required.
- No new issues raised.

140. Kathy Jacobs (Rathdown Park)

- Support enhanced public transport.
- Concern for the justification and need for the project.
- A Metro is required.
- Lack of governance, accountability and consultation.
- Concern of impact on family life, access to schools, activities, sports clubs and facilities.
- Concern of impact upon urban villages
- Concern of loss of trees, impact to property from CPO, widening of roads, loss of access to facilities and amenities, traffic congestion, traffic displacement and right / left turn bans and impact upon businesses.
- Concern of impact upon Terenure in particular, 'no right turn' at Terenure College is impactable.
- Concern of closing off Templeogue Road at Olney Crescent is impactable.

- Concern pushing all traffic from Rathfarnham Road through Rathdown Park will cause serious congestion and safety issue if emergency services cannot access resident's homes.
- Query the cost benefit analysis, impact upon lives and communities, environment and habitat destruction.
- Concern of removal of bus stops.
- Lack of provision of continuous cycle lanes
- Concern of installation of bus gates

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No new issues raised.

141. Keith Walsh, Camden Inns Limited

- Displacement of traffic
- Removal of loading bay on the west side of Wexford Street
- Concern of lack of traffic management plans on Wexford Street and Camden Row.
- Concern of impact upon commercial activity and general attractiveness as a place to visit and do business.
- Consideration should be given to more longer term alternatives such as an integrated light and heavy rail network that covers all suburbs.

142. Kerrie Glynn (Bloomfield Park Portobello)

- Opposed to the CPO of lands at the junction of Lennox Street and Richmond Street South thereby eliminating the public right of way.
- Concern of traffic chaos
- Concern of traffic congestion on Synge Street, Shaw Court, Stamer Street, Kingsland Park Avenue, Victoria Street, Bloomfield Avenue and surrounding routes due to road closure of Lennox Street.
- Concern of serious traffic hazard and forcing 100's of vehicles through restricted streets.
- Concern of lack of analysis of the traffic impact to the area of Portobello.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No new issues raised.

143. Kieran Comerford (Charleville Close)

- Concern of impact of the proposal on Charleville Close and Charleville Road.
- Concern of impact of egress from Wynnefield Road.
- The proposed right turn which is to be permitted from Leinster Road to Lower Rathmines Road is to be welcomed.
- Object to the whole Spine A proposal.
- Limited improvement in journey time for those living in areas beyond Terenure and no benefit at all for those in Rathmines.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- The proposed changes are short term and expensive and disruptive.
- It makes sense to extend the Metrolink from Charlemont to Rathmines and on to Terenure and beyond.
- Request that Spine A be implemented without any major changes to the existing roads in the Rathmines area.
- No new issues raised.

144. Leah Donnelly and Others (Woodview Cottages)

- Concern of location of the construction compound area TR3 proposed in the Woodview green amenity area, as it is a flood plain (Both A&B).
- Concern of River Dodder bursting its banks again.
- Concern of destruction of the amenity space.
- This area was used as a temporary depo for Dodder Greenway works for the last 3 years. Alternative location should be looked at.
- Concern of further disruption and impact upon residents (noise, dust, traffic)
- Contrary to Z9 Zoning Objective of the CDP

145. Leila Anglade (Rathgar)

- Concern of impact of increased traffic on Highfield Road
- Concern of safety for cyclists
- Concern of impact of patients/ access to Saint Luke's Hospital.
- Justification of the proposal is flawed.
- Concern of negative impact upon urban villages from increased traffic.
- An underground Metro is needed to save the built heritage and special character of the historic streets of Dublin.
- The introduction of school buses is necessary to improve the lives of families and residents.

146. Liam Bell (No. 63 TRE)

- Object to the proposed roads case and to the CPO (of lands at 63 TRE)
- **Request that an OH be held.**
- Concern of impact of bus gates.
- Concern of justification and need for the proposal esp. as it relates to TRE
- Queries the CBA of the scheme.
- Concern of loss / destruction of trees, historic built heritage, protected structures, original railings, stone boundaries and parts of gardens.
- Concern of loss of elm tree in the garden of No. 63 TRE, trees at Beaumont House, Argos House and those at No. 61.
- Concern no bicycle lane proposed on TRE
- Concern of pinch points at Rathgar and Terenure.
- Concern of flawed consultation process.
- Contrary to Aarhus Convention.
- Concern of conflict with Dublin City Development Plan.
- Concern of CBA of the project.
- Concern of need, justification and time saving involved.
- Concern of lack of alternatives considered.
- Concern of the impact of the new right turn for buses, taxis and cyclists at Terenure Cross, from Rathfarnham Road towards Rathgar via TRE.
- Concern of loss of on street parking, loading areas and local access on businesses and local traders.
- Concern the proposal is excessive.
- Concern of times of operation of the bus gates.
- Concern cycling arrangements are unsatisfactory, piecemeal, chaotic and dangerous.

- Concern of rat running, traffic displacement and increased traffic volume on suburban roads.
- Concern of impact upon journey times (travelling by car) for locals, esp. elderly.
- Concern of CPO of lands esp. for more vulnerable people.
- Concern of lack of communication and in person consultation.
- Concern it is premature to consider the approval of a CPO, since the scheme does not have planning permission.

147. Liam Fitzgerald (Highfield Road)

- Concern of negative impact upon village of Rathgar.
- Concern of impact of increased traffic on Highfield Road.
- Concern of traffic congestion and safety.
- Concern of loss of trees, noise pollution and increased emission reducing air quality.
- Concern of loss of gardens.
- Concern of justification in terms of reduced journey times.

148. Linda Hackett (Highfield Road)

- Concern of impact of increased traffic on Highfield Road.
- Concern of lack of a cycle lane on Highfield Road.
- Concern of traffic congestion and safety.
- Concern of removal of the ban on no right turn from the Upper Rathmines Road to Highfield Road.
- Concern of the removal of the ban on no right hand turn from Highfield Road onto Rathgar Road will cause additional delays at this junction and create traffic backlogs.
- Concern of access to from the main car park of Christchurch Rathgar and implications for meals on wheels service.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Concern of public consultation held.
- Concern of proposals for Rathgar Road.
- Highfield Road is not wide enough to facilitate bus lanes or cycle lanes.

- Concern of impact of increased traffic on Highfield Road and surrounding residential streets.
- Concern of impact of Bus gate on Rathmines Road Lower.

149. Linda Patton (Terenure)

- Concern of lack of cumulative impact of Busconnects projects.
- Concern of impact to local communities and urban villages
- Concern of impact of bus gates and times of operation.
- Concern of impact upon residents' access to services, shops, amenities and facilities, journeys which cannot be done by private car.
- Concern of impact on residents of Terenure.
- Concern of accurate modelling and justification for the project.
- Concern of flawed public consultation process.
- Concern of impact upon local businesses.
- Concern of project splitting and consideration of in combination effects between different routes.
- Concern of impact upon nature conservation. Loss of trees, habitat and feeding areas for bats.
- The feasibility of extending the proposed Dublin Airport underground metro to the southwest should be considered.
- Consideration should be given to allow residents free movement outside of rush hour, bus gates and restriction on turns into residential streets should be removed or operate at peak times only.
- Support having segregated cycle lanes from traffic and from pedestrians along main routes.
- Concern consideration of alternatives not considered.
- Clarification is needed if existing bus routes are to be retained or not.
- Concern of capacity issues on buses.
- Concern of impact to elderly and mobility impaired people.

150. Lissenfield Management Company CLG (Rathmines)

- Concern of location of 'bus gate' immediately adjacent to the entrance to Lissenfield.
- Concern of prohibition on right turning movements, except for public service vehicles and cyclists, from the entrance to Lissenfield onto Rathmines Road Lower between 6.00 am and 20.00 (Monday – Sunday)
- Request the bus gate be omitted or relocated to the north of the entrance to Mary Immaculate Refuge of Sinners Church on Rathmines Road Lower.

- Request that the prohibition on right turning movements also be omitted.
- Changes proposed would allow existing levels of accessibility / connectivity residents currently enjoy and given their marginal nature, will not compromise the scheme.
- Concern of the impact of the proposal on the level of connectivity (to services, amenities and facilities) which the residents of Lissenfield currently enjoy.
- Concern of impact upon patrons, local community funerals, weddings, baptisms and other celebrations at the church in Rathmines.
- Support the submission by the Parish Priest of Mary Immaculate Refuge of Sinners Church.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Concern of impact of the Rathmines bus gate on Lissenfield.
- Error in the documentation. Submission calls for relocation of the bus gate north of Richmond Hill and not south of Richmond.

151. Lorna Callanan (Rathfarnham Road)

- Consider the objective to improve mass public transport and cycling infrastructure and reduce congestion is commendable and necessary the short-term benefits of the proposal are not proportionate.
- Query the CBA of the scheme.
- **Requests and OH be held.**
- Breach of Part M of the Building Regulations on Rathfarnham Road, Rathdown Park Junction to Pearse Bridge
- Concern of CPO's affecting 51, 53, 55, 57, 59, 61, 63, 65, 67, 69 and 71 Rathfarnham Road.
- Concern of lack of information despite requests and complex terrain.
- Moving signalling 150m to the west at Saint Joseph's Church, will extend CPO of historical boundaries (and listed) for road widening and yields no material advantage.
- Concern of destruction to amenity, heritage, listed properties, trees / environment, etc
- Concern of proportionality, justification and need. Query time savings proposed.

- Concern of lack of consideration of alternatives.
- Concern proposal is contrary to the Dublin City Development Plan.
- Concern of reduction in footpath width outside the PO/Centra on Terenure Road North.
- Missed opportunity for public realm improvement in Terenure.
- Concern of CPO and destruction of fabric and amenity of the local environment.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Inadequate response to breach of Part M of the Building Regulations on Rathfarnham Road, Rathdown Park Junction to Pearse Bridge.
- Inadequate response to NRB Consulting engineers report – obliged to demonstrate that compliance exists.
- Attached updated 2024 letter from NRB consulting engineers, querying compliance and requesting ‘before and after’ cross sections through affected residents property on Rathfarnham Road.
- No new issues raised.

152. Macdara O Morain (Rathgar Road)

- Concern of impact on residents of Rathgar.
- Concern of impact to local communities and urban villages.
- Concern of speed of buses on Rathgar Road.
- Concern of impact of bus gates and times of operation.
- Concern of impact upon residents’ access to services, shops, amenities and facilities, journeys which cannot be done by private car.
- Concern of noise, increased emissions, and loss of trees.
- Concern of negative impact on public realm and streetscape.
- Concern of justification and need for the proposal.
- Object to the relocation of the city bound bus stop on Rathgar Road to outside no. 77 – no. 80 Rathgar Road. Suggest relocating it to 95 – 96 Rathgar Road.
- Concern relocation of the bus stop is dangerous.
- Concern for cyclist safety.
- Concern alternatives have not been considered and a trial of the system has not been carried out.

- Query CBA and time saving involved.
- Concern that traffic implication of all 12 corridors running concurrently have not been modelled or trailed.
- Concern of outdated traffic count data, soundness and credibility of data and inadequate EIA.
- Concern of inadequate public transport service for Harolds Cross Road.
- Exclusion of Harolds Cross Road, the by passing of the N81 and R137 is fundamentally flawed premises.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Letter indicating a wish to make a further submission.
- No new issues raised.

153. Maire O Kelly (Church Avenue)

- Concern of people's right to have convenient access to Church, chapel or other place of worship.
- Concern of impact upon elderly and visually impaired.

154. Malachy and Jackie Farrell (Lower Rathmines Road)

- Concern of the bus gate on lower Rathmines Road – impact upon Grove Park will see increased traffic.
- Submit that a yellow grid box would be required, at Grove Road / Grove Park Junction, to facilitate vehicles turning right.
- A mini roundabout is required at the junction of Mountpleasant Road Lower and Canal Road.
- Submit access should be allowed through the bus gate for bin trucks.
- Concern of time restrictions of bus gate.
- Submit residents should be provided with permit stickers allowing access via bus gate.
- Submit that bollards proposed at Mountpleasant Avenue Lower be automatic to allow emergency services.
- Concern of access at Lissenfield Rathmines Road Lower, dishing of cycle lane curbing at the entrances of houses on Lower Rathmines Road on the east side.

- Concern of traffic speeds.
- Noise and vibration studies and data needs to be updated.
- Concern of hours of construction and disruption to residents due to noise, amenity and mental health of the residents.
- Residents should be informed of any disruption planned i.e. unsocial working hours.
- Opportunity to provide a conduit for TY / Internet services, facilities / utilities for EV underground.

155. Marcus Purcell and Family (67 Rathfarnham Road)

- 67 Rathfarnham Road Terenure is affected by the CPO, impossible to understand the full impact of the proposed CPO on property.
- Concern of potential violation of Part M, of the Building Regulations.
- Concern of lack of detailed design.
- Reserve the right to expand on submission at the OH.
- Further issues raised are similar to issues raised by Liam Bell (No. 63 TRE) set out above at submission no. 146 of this report.
- No new issues raised.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Not satisfied with lack of an OH.
- Not satisfied that issues raised have been responded to satisfactorily.
- Breach of Part M of Building Regulations of significant concern.
- Lack of clarity in terms of how issues will be addressed.
- Attached 2024 letter from NRB consulting engineers re breach of Part M of Building Regulations.
- Attached NRB Consulting engineer's addendum letter, dated 2024. Regarding Part M Compliance.
- Attached RW Nowlan & Associates addendum report dated 2024, regarding justification for setback of front boundary wall of gardens 61 – 71 Rathfarnham Road.

156. Margaret and Patrick Kelly (Charleville Road)

- Concern of justification, need and CBA of the scheme.
- Concern of impact upon urban villages, needs of the elderly, those with children, disabled and businesses.
- Concern of planting of trees and maintenance issues.
- Concern of proposal to move stone walls, railings and boundary features along TRE and Rathgar Road.
- Concern of traffic chaos around Rathmines due to traffic displacement to residential roads.
- Concern of egress from Charleville Road.
- Concern that, alternative solutions, for greatly improving the flow of traffic, reducing pollution and diverting people to public transport by introducing a congestion charge, increasing parking fees and reducing or eliminating fares on public transport have not been considered.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Concern an OH was not held.
- Concern of project splitting
- Loss of trees
- Concern of future maintenance of proposed street planting.
- No new issues raised.

157. Margaret Silke (67 TRE)

- Owner of 67 TRE a property affected by CPO
- Concern of impact upon private property.
- Concern of absence of detailed final design drawings.
- This submission reiterates the submission by Marcus Purcell and Family (67 Rathfarnham Road), and Liam Bell (No. 63 TRE) set out above at submission no.'s 145 and 154 of this report.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No new issues raised.

158. Mari O'Leary (Rathgar Road)

- Concern of justification, need and CBA of the scheme.
- Concern of impact upon urban villages, needs of the elderly, those with children, disabled and businesses.
- Concern of loss of trees.
- Concern of impact upon access to Mary Immaculate Refuge of Sinners Church in Rathmines and St. Mary's school.
- Concern of traffic chaos around Rathmines due to traffic displacement to residential roads.
- Concern of removal of the current Rathfarnham QBC from Harold's Cross Road.
- Concern that footpaths will have capacity to accommodate increased numbers of pedestrians.
- Concern of conflict with DMURS
- Concern of unsafe cycle lanes as not continuous.
- Concern of bus stop relocations in Rathgar Village, TRE and Rathgar.
- 24 hr/ 7-day bus lanes are not required and will impact car parking and accessibility.
- Concern that, alternative solutions, for improving the flow of traffic, reducing pollution and diverting people to public transport by introducing bus signal lights, cashless payment on buses, park and ride facilities and congestion charges, have not been considered.
- Concern that the proposal is disproportionate cost in terms of trees, conservation and community disruption.

159. Maria Blair (Rathfarnham Wood)

- Object to CPO of 10 Rathfarnham Wood Plot List 1018(1).1(d), 101B(2).2d
- Object to CPO of Woodland area of Rathfarnham Castle Park Plot list 1001(1).1f; 1001(2).2f.
- Concern of impact to rear garden, lands sought to be acquired is 27 sq. m and the lands sought temporarily is 33.1 sq. m
- Concern of level of disruption and environmental impact.
- Agree and support all of the grounds of the Rathfarnham Wood Residents Association (RWRA) submission.
- Concern of loss of trees, removal of / impact upon shed and granite boundary wall.
- Concern of impact upon hydrology and Glin River
- Concern Water Framework Directive has not been complied with.

- Concern of impact upon Rathfarnham Castle Park.
- Concern of impact upon climate, flora and fauna, landscape and visual, noise, vibration and air.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Bus corridor should terminate at the Rathfarnham Village bypass.
- No new issues raised.

160. Marina Lynch and Kingston Mills (Brighton Road)

- Concern of justification and need for the project.
- Concern of impact upon the environment.
- Concern that the project will increase journey time by bus.
- Concern of increasing speed and destruction of neighbourhoods.
- Concern of environmental impact and lack of consideration of alternative Light Rail / tram service (LUAS)
- Concern of consideration of alternatives to improving public transport.
- Concern due regard is had to submissions and concerns raised.

161. Mark and Linda Smith (Highfield Road)

- Concern of impact upon / destruction of historic and cultural fabric of the city.
- Concern of negative environmental impact.
- Concern of consideration of alternatives at a time of climate change.
- Concern of impact upon businesses, in particular, deliveries to businesses on Highfield Road (Supervalu)
- Concern of impact upon delivery trucks, vans, and lorries.
- Concern of access for pedestrians in particular the elderly.
- Concern of justification of the project in terms of loss of trees and shorter journey times.
- Concern of no benefit to Rathgar no planning gain in terms of public amenities.
- Endorse the submission made by Rathgar Residents Association.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Concern of lack of car parking
- Concern cycle lanes will block kerbside access for deliveries to businesses.
- No new issues raised.

162. Mark Duggan and Maria and Brian Bilings (Orwell Park Glen)

- Concern of bus management in the city centre – how buses will travel through the city centre.
- The current city wide Busconnects network indicates that buses arriving at the junction of South Great George's St. and Dame St, will turn right and pass-through College Green. However, DCC plans is for this area from Georges Street / Dame Street junction to College Greet to be traffic free.
- Concern of how the north Quays from Ormond Quay to O'Connell Bridge will cope with the volume of buses.
- Concern of how south Quays will handle additional volume of buses.
- College green Plaza was previously rejected by ABP due to negative impacts on bus movements and on traffic, particularly on city quays.
- Concern of failure to examine alternative modes of transport.
- The proposal made by Metro South West Group (MSWG) was not examined by the NTA.
- Journeys times by Metro v bus v private car would be less utilising Metro link.
- Consider that Park and Ride should be considered for Spawell and Dodder Valley Park.
- Concern of traffic delays, traffic chaos and traffic displacement at Spawell roundabout due to additional sets of traffic lights.
- Concern of impact upon local residents in the Orwell Park area, local access to schools and GAA clubs.
- Concern of traffic safety and increased hazard conditions on the M50.
- Concern of impact upon local journey time necessary by private car.
- Concern of impact upon social interaction, particularly, among the elderly and mobility impaired.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No new issues raised.

163. Mark Fitzgerald (Rathfarnham Road)

- Concern of CPO of front garden of 149 Rathfarnham Road.
- Concern of increased noise levels, and air pollution.
- Concern of negative impact upon residential amenity and community.
- Concern of devaluation of property.
- Concern of traffic speed of buses and safety of pedestrians/residents.
- Query the justification and need for the project post Covid.

164. Martin and Bernie Gibbons (Rathdown Crescent)

- Concern of proposed right turn ban from TRW into Rathdown Crescent.
- Request that the proposed cycle access into Rathdown Drive be removed.
- Concern of cyclist safety on Rathdown Drive given narrow restricted width of the street.
- **Request that an OH be held.**

165. Mary Dunning (Whitehall Road Terenure)

- Disproportionate focus on commuters over communities.
- Concern of little improvement planned in the provision of cross suburban bus services.
- It is not always possible or appropriate to use public transport or bicycles to carry out general day to day business.
- Concern the plans included in this scheme (Corridor A), along with the schemes for the Kimmage Corridor F and the Greenhills/Clondalkin D plans, if implemented, will have a detrimental impact on communities
- Concern of the proposed one-way inbound system on the Rathgar Road necessitating the use of the heavily congested Upper Rathmines and Highfield Roads for all outbound journeys.
- Concern of closure of Templeogue Road 14 hours per day
- Concern of displacement of traffic
- Concern of the closure of Rathmines Road
- Concern of the change to a signalised junction at the Spawell Roundabout.
- Concern of the numerous Right Turn Bans.

- Concern of the removal of 1 of the outbound bus stops on Georges Street.
- Need to assess combined impact of the three schemes A, D and F corridors.
- Concern for cyclist safety
- Concern of impact upon climate, increasing greenhouse gas emissions and negatively affecting air quality.
- There is a need for updated traffic modelling.
- Concern of serious disruption for local communities and for the residents in the Crumlin/Kimmage/Terenure/Rathmines areas.
- Concern of bottle necks and traffic chaos.
- Concern consideration of alternatives has not been carried out:
 - The introduction of a congestion charge for City Centre during peak times.
 - Require Government Departments to close their car parks with the exception of car spaces for the disabled/emergencies.
 - Undertake updated traffic modelling in the area.
 - Review the case for Metro West.
 - Provide dedicated cycle greenways along the Dodder into town for improved safety.
 - If bus gateways have to be introduced, limit it to peak hours only, Monday to Friday.

166. Mary O'Farrell (Ranelagh)

- Supports the submission by the PP of Rathmines
- Concern of impact upon Mary Immaculate Refugee of Sinners
- Concern of impact of the proposed bus gate as it has made no provision or allowances for the functioning of the Church.

167. Mary O'Mahony (9 Rathfarnham Wood)

- Object to CPO of 9 Rathfarnham Wood Plot List 1017(1).1(d), 1017(2) 2d
- Object to CPO of Woodland area of Rathfarnham Castle Park Plot list 1001(1).1f; 1001(2).2f.
- Concern of impact to rear garden, lands sought to be acquired is 1.6m and the lands sought temporarily is 3m
- Concern of level of disruption and environmental impact.

- Concern of loss of a 100 year old tree in private rear garden
- The CPO and removal of the tree is disproportionate and unnecessary.
- Concern of removal of / impact upon 3m high granite boundary wall.
- Agree and support all of the grounds of the Rathfarnham Wood Residents Association (RWRA) submission.
- Concern of impact upon hydrology and Glin River
- Concern Water Framework Directive has not been complied with.
- Concern of impact upon Rathfarnham Castle Park.
- Concern of impact upon climate, flora and fauna, landscape and visual, noise, vibration and air.

168. Maura Byrne (Rathgar Road)

- Concern of the location of the bus stop at No. 85 / 86 Rathgar Road.
- Concern of proposal to route more buses through Rathgar.
- Concern that the relocation of the bus stop to outside No. 80 / 81 Rathgar Road is not appropriate and it should be relocated to be outside two large apartment blocks at numbers 94-95 and 96-97 Rathgar Road.
- Bus Connects plan is fatally flawed.
- Concern of destruction of built historic heritage of Rathgar.
- Concern for impact upon community and justification for the project in terms of time saving and impacts.
- Concern for so little gain, heritage, trees, livelihoods and wildlife are threatened.
- Concern of CPO of private property.
- Concern of traffic implications on all local streets.
- Concern of the bus gate at St Mary's College in Rathmines.
- Concern of one-way traffic, right/left turn bans.
- Concern of impact on the businesses in Rathgar due to loss of parking in the village.
- Concern of reduced width of footpaths in the Rathgar area.
- Concern of the overall safety of the proposed cycle paths.
- Concern that alternatives have not been considered
- proposed measures should be trialled before planning is granted
- Environmental Impact Assessment (EIA) is fundamentally flawed and is not fit for purpose as it does not take into account the fall-out of other bus corridors in the area.

- Concern of inadequate public transport service for Harolds Cross Road.
- Exclusion of Harolds Cross Road, the by passing of the N81 and R137 is fundamentally flawed premises.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No new issues raised.

169. Maureen O' Halloran (Highfield Road)

- Concern of loss of trees.
- Concern of destruction of Rathgar village.
- Concern of CPO of lands TRE.
- Concern of traffic problems on Highfield Road.

170. Maurice Dorney & Dympna Dorney (Highfield Road)

- Queries justification and need for the proposal.
- Queries the premises of the proposal.
- Concern a congestion charge and park and ride facilities have not been considered.
- Concern of traffic grid lock, delays, emissions
- Consideration should be given to one-way roads out of the city to support inward access.
- On street parking on one-way roads should be banned.

171. Meals on Wheels Rathmines

- Meals on Wheels operates from St. Mary's Community Centre, Richmond Hill, Rathmines.
- Concern of bus gate on Rathmines Road and negative impact upon delivery times.
- Suggest that the bus gate hours are open to car traffic Mon – Fri from 10 am to 4 pm in both directions North South.
- Concern of negative consequences of delivery drivers volunteering.
- Concern of proposed bollards on Lower Mountpleasant Avenue.
- Request that the return of the left turn from Rathmines Road Lower onto Castlewood Avenue be considered.

- Request a turning circle at the junction of Lower Mountpleasant Avenue and the Canal to facilitate turning onto Rathmines Road.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No new issues raised.

172. Melisa Kearney (Templeville Road)

- This submission reiterates the issues raised in Senator Mary Seery Kearney's submission, summarised below.

173. Mery Fenton, Olwyn Callaghan and Mary Rose Callaghan (Lissenfield)

- Concern of location of 'bus gate' immediately adjacent to the entrance to Lissenfield.
- Concern of prohibition on right turning movements, except for public service vehicles and cyclists, from the entrance to Lissenfield onto Rathmines Road Lower between 6.00 am and 20.00 (Monday – Sunday)
- Request the bus gate be omitted or relocated to the north of the entrance to Mary Immaculate Refuge of Sinners Church on Rathmines Road Lower.
- Request that the prohibition on right turning movements also be omitted.
- Concern changes proposed would have a serious disruptive impact upon residents of Lissenfields, impacting levels of accessibility / connectivity to services, family, healthcare.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Personal circumstances that require immediate access to medical and primary care services.
- Concern essential access to medical care and services will be severely impacted and impeded.
- No new issues raised.

174. Michael and Ann Marie Morris (Highfield Road)

- Concern of traffic implications for Rathgar and Highfield Road

- Concern of impact upon access to Saint Luke's Hospital
- Concern of loss of historic heritage and impact to protected structures.
- Concern of impact upon communities and businesses.
- Concern alternatives such as Metro / Luas have been discounted.
- Concern of justification, time saving and CBA.

175. Michael and Colette Clarke and Others (Rathgar Road)

- Concern of traffic chaos in Rathgar.
- Concern of justification, time saving and CBA.
- Concern of impact upon safety of pedestrians.
- The proposal is fundamentally flawed, it does not take account of the environment in which it operates – converging traffic, narrow streets.
- Concern of removal of a number of bus stops on Rathgar Road.
- Concern that the proposal makes travel by car difficult.
- Concern of impact upon Highfield Road.
- Concern of access, to schools and services.
- Consideration should be given to making public transport free.
- The area needs trams and or rapid rail.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Response by the NTA to submission made is unsatisfactory.
- No new issues raised.

176. Michael Bermingham (6 TRE)

- Object to the CPO of property at 6, The Townhouse, Terenure Road East – Plot List 1048(1).1(d), 1048(2).2(d)
- Concern detailed drawings of final design not available.
- Concern of consultative process to date.
- Question the overall design and background planning of the scheme.
- Concern of impact upon urban villages and those who live and work in these older areas of Dublin.
- Concern the proposal contravenes The Aarhus Convention.
- Concern of land-take by CPO
- Concern of impact upon treescape and landscape.

- Concern of justification of CPO of lands from Greenmount Road to Argos House.
- Concern of traffic impact upon Highfield Road and Terenure Road East.
- Concern of loss of historic heritage.
- Concern of impact upon urban villages
- Concern of justification, need, CBA and time savings.
- Concern alternatives have not been considered.
- Concern of impact of CBA on Terenure Cross, Terenure Village, TRE and Rathgar.
- Concern of impact upon businesses, loss of on streetcar parking spaces, traffic congestion and access for elderly.
- Concern of pedestrian and cyclist safety.
- Concern of impact of one-way systems and Bus Gates on secondary or small local roads.
- Concern of critical analysis and integrated traffic modelling has not been carried out.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No new issues raised.

177. Michael McAuley (Rathfarnham Road)

- Concern of impact upon private property and safety of family.
- Concern of CPO of front garden of 143 Rathfarnham Road.
- Concern of devaluation of property.
- Concern for pedestrian safety from speed of buses.
- Concern of need and justification of the project.
- Concern of impact upon community.

178. Michele Van Valey and Derek Hennessy (Terenure)

- Concern of impact upon local businesses
- Concern of inbound traffic on the Templeogue Road turning left onto Fortfield Road.
- Concern of the no turn right onto Greenlea and Laverna Roads.
- Restricting local traffic from turning right is going to impede pensioners access their homes, services and medical needs.

- Concern of bus gate in Rathmines.
- Concern mobile physiotherapy business will be impacted, as with heavy equipment travel by bus or bike is not viable.
- Concern of access to shops.
- Concern of safety for pedestrians and cyclists.
- Concern of disruption to existing bus routes, traffic congestion, 'no right turn bans' and creation of rat runs.
- Lack of consideration of alternatives, such as Metro.
- Concern of impact upon communities.

179. Mick and Miriam Dunne (Villiers Road)

- Concern of lack of public consultation.
- Concern of impact to non-bus traffic.
- Concern of traffic congestion in particular on Villiers Road.
- Concern of justification and need for the proposal.
- Concern of environmental and ecological impact.
- Concern of traffic displacement to surrounding residential roads.
- Concern of changes in access from Upper Rathmines Road and the removal of the slip at the junction of Highfield Road and Rathgar Village.
- Concern of traffic congestion of Highfield Road.
- Concern of cycling and pedestrian safety of residents.

180. Mona Stafford (Templeogue Road)

- Concern of relocation of Bus Stop to 217 Templeogue Road
- Concern for legally disabled driver and require an adapted car.
- Cannot take the bus as unable to stand for any length of time.
- Proposed no bus stop at all on stretch of road from 211 to Templeville lights.
- Note and agree with the observations made by Senator Mary Seery Kearney.
- The ground at 217 is prone to flooding and inappropriate for location of a Bus Stop.
- The Bus Stop at Terenure should be retained.

181. Monica Tansay (Rathfarnham)

- Concern of removal of 34 mature trees and one hazel thicket from Templeogue Road side of Bushy Park and a further 94 mature trees from Rathdown Drive / Rathdown Crescent section of Templeogue Road.
- Concern of impact upon climate change, and on human, animal, bird and insect life.
- Concern of a bottleneck at junction of Templeogue Cross with Fortfield Road.
- Object to the CPO of areas containing trees.
- Consideration should be given to alternatives to prevent trees being removed esp. at Bushy Park and Rathdown Park.

182. Mrs Marian Pau (Woodview Cottages)

- Concern of location of construction compound
- Concern of impact to residential amenity.
- Concern of impact upon architectural heritage
- Concern of loss of a valuable recreational area.
- Concern of impact upon the environment, loss of biodiversity, wildlife habitats.
- Concern of flooding, pollution impacts and air quality deterioration.
- Concern of road safety and traffic management.
- Concern of devaluation of property.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No new issues raised.

183. Muireann O’Dea, Frank Cronin and Oran Doyle (Terenure)

- Broadly support the proposal.
- The proposed scheme will provide much improved bus services, safe segregated cycling facilities and will create a cleaner, quieter environment for everyone.
- Particularly welcome the following:
 - The overall increase in cycling facilities from 11 km to 23.3 km of which 85.4% will be segregated
 - The provision of (almost) continuous segregated cycle tracks from Rathfarnham through Terenure to Harolds Cross
 - The segregated cycle tracks from Rathgar and Rathmines to the city centre

- The segregated cycle tracks from the Tallaght M50 junction to Templeogue, and from Templeogue Village to Rathdown Avenue
- The bus gate at Olney Grove to provide bus priority through the Terenure Village
- The bus gate in Rathmines and segregated cycle tracks through Rathmines Village
- Concern of cycle track widths, gaps in cycle tracks, quiet street treatment and speed limit enforcement.

184. Naomi Murphy (Terenure)

- Query the need and justification of the project.
- Concern that access by car to relatives, local amenities, shops, churches and parks will be disadvantaged.
- Concern of access to schools and sports amenities.
- Concern of impact to landscape, biodiversity, impact on health.
- Alternatives such as light rail (Luas / Metro) should be considered.

185. Nessa McGarrigle and Oisín Tobin (Greenmount Road)

- Query the justification and need for the project.
- Concern of limited upside and actual timesaving by bus.
- Concern of CBA
- Concern of an inaccurate understanding of the transport needs of citizens.
- Concern of lack of cumulative impact assessment of the project.
- Concern of flawed data base.
- Concern of air and noise pollution, grid lock, and traffic chaos.
- Concern of impact upon urban villages and communities.
- Concern that other, more proportionate, solutions are not considered.
 - Introducing congestion charges in the city centre such as that successfully introduced in London 20 years ago
 - Increasing the number of buses running on each route (convenience of frequency over total journey time).
 - Introduction of park and rides which work very successfully in other places (Oxford for example)
 - Ensuring the existing bus lanes operate efficiently.
 - Concern of reduced accessibility of bus service for some, due to removal of bus stops, removal of service to Bushy Park Road.

- Concern of impact upon environment, amenities, historic features and trees.
- Concern of impact upon pedestrian safety.
- Concern of increased car journey time due to right turn ban from Greenmount Road to TRE
- Concern of car journeys from Greenmount Road to:
 - Grand Canal Dock
 - Grangebrook estate.
 - Whitehall Road West.
 - Georges Street Dunlaoghaire
 - Dunnes in the Swan centre, Greenmount road to Tesco/homebase/Harvey Normans Ashgrove shopping centre, Greenmount road to Woodies in Tallaght. (Note: none of these are in the city centre)

186. Niall and Yvonne Gunne (Highfield Road)

- Concern of traffic impact upon Highfield Road
- Concern of displacement of traffic onto residential streets.
- Concern of making Rathgar Road one way and consequences for surrounding streets.
- Concern for children's safety being put at a heightened risk as is the safety of general pedestrians and cyclists.
- Concern of justification, need and data analysis.
- Concern of CPO of lands and loss of trees.
- Request that Rathgar Road is open to two way traffic and failing this to retain the current restrictions preventing cars turning from the Upper Rathmines Road onto Highfield Road.

187. Niall Turley (Highfield road)

- Object to the proposed rerouting of traffic heading out of the city via Templeogue / Rathfarnham, onto the Rathmines Road Upper and Highfield Road.
- Consideration should be given to a Bus traffic light system to give preference to buses beside shops at top of Rathgar Road.

- Concern of traffic congestion and chaos on Rathmines Road Upper.
- Concern of negative impact to Rathgar / Palmerstown / Rathmines / Ranelagh.
- Object to a large sign proposed, Ref. road marking page 29 BCIDC-ARP-TSM_GA-1012_XX_00-DR-CR-0026
- Query the viability and need for the scheme. A Luas system should be considered.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No new issues raised.

188. Niamh Wilson and David O'Doherty (Church Lane)

- Concern of location of construction compound TR3
- Concern of impact to residential amenity.
- Concern of devaluation of property.
- Concern of loss of a valuable recreational area.
- Concern of impact upon the environment, loss of biodiversity, wildlife habitats.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Request a meeting with local residents and ABP to discuss matter in person.
- Request more information is needed.
- No new issues raised.

189. Nigel Clerkin

- Query the necessity of the project.
- Concern of excessive restrictions to local traffic on Rathgar Road.
- Concern of removal of bus stops.
- Concern of distance between bus stops on Rathgar Road, in excess of 400m.
- Concern of removal of off peak parking.
- Concern Franfort Avenue will become a rat run.
- Concern for excessive restrictions on Rathmines through – traffic.
- Concern at the proposed hours of operation of the bus gate in Rathmines.

- Concern Rathmines Road Upper is unsuitable as an arterial outbound route.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No new issues raised.

190. Nora McCaul (Rathgar)

- Concern of removal of bus stop from Bushy Park Road
- Concern of diminishment of bus services to Bushy Park Road residents.
- Concern of negative impact to elderly.
- Concern of negative impact to residential amenities of the area.

191. Orla Kelly and Paul Farrell (Templeogue)

- Concern of traffic congestion, parking and access impacts.
- Concern of pedestrian and cycle safety, lack of continuous, segregated cycle lanes.
- Concern of proposed land acquisition. Loss of driveways, parking areas, reduction in property value, reduction in privacy and security.
- Concern of removal of bus stops.
- Concern of inadequate consultation process.
- Concern of environmental health, air and noise pollution.
- Query the need and viability of the scheme.
- Concern of loss of trees.
- Concern of loss of historical built heritage.
- Concern of adequacy and efficacy of modelling.
- Concern of reliance on ambiguous and un-supported 'sound bites' (24-hour use of bus lanes when buses do not run on a 24hour basis).
- Concern that impacts for religious practice have been ignored.
- Concern that implications for commercial life have been ignored.
- Concern that consultation was not face to face and inadequate.

192. Orla Murphy (Terenure)

- Concern of traffic chaos, grid lock, illegal parking, U-turns, rat running and nuisance driving.
- Concern that current and future demand analysis for Busconnects has been adequately assessed.

- Query the justification and need for the project.
- Question the capacity and demand analysis.
- Concern of the proposed traffic progression system to be put in place to prevent gridlock at KCR once people cannot drive through Templeogue / Terenure Village.
- Concern of capacity at peak hours and service for commuters of Terenure.
- Concern the proposed changes favour commuter's from Ballycullen.
- Concern commuters from Terenure/Templeogue/Bushy Park cannot get a bus in the morning to get to work or college.
- Concern of impact upon residents.
- Concern of confirmation on how buses will proceed at the end of Georges Street through the city centre.
- Concern of CBA of the project compared to a metro option.
- Concern of removal of trees along the Templeogue Road at Rathdown.
- Concern of impact upon the environment from loss of trees.
- Concern of issues around A spine from Tallaght through Terenure.
- Concern of issues around A spine from Ballycullen/
- Concern of impact upon access to Bushy Park
- Concern of impact upon access to schools in the Fortfield area.
- A Metro system is required.
- Alternative solution is required for cyclists going into Rathown Park / Rathdown Crescent without tree cutting.

193. Orwel Park Residents Association

- Queries the premise, need and projections of the project.
- Concern alternative proposals have not been examined.
- Concern that CBA carried out is inadequate. Inevitable high costs.
- Concern that supply of critical information is lacking –
 - ABP to request information on how many buses are forecast in the peak hour on each corridor?
 - How buses will proceed through the city centre?
 - How buses will proceed through TRE?
 - What are the impact of measures?
- Concern of limited benefits. (Capacity and time savings)
- Concern of severe disruption for car trips.
- Request that ABP refuse the proposal or approve with conditions:
 - Remove the fares process.

- Replace bus gates by bus priority.
- Limit construction and land – take to curtail expenditure.
- Preserve existing cycling lanes.
- Reduce bans on right hand turns.
- Consider continuing Metrolink from St. Stephens Green to South West Dublin.
- Supportive of submissions prepared by other representative organisations.
- Concern of road closures and displacement of traffic.
 - Closure of Templeogue Road
 - Closure of Rathmines Road
 - Impact upon Castlewood Avenue
 - One way inbound system on Rathgar Road impacting upon congestion on Upper Rathmines Road and Highfield Road
 - Change to the signalised junction at the Spawell Roundabout.
 - Numerous right turn bans
 - The removal of 1 of the outbound bus stops on Georges Street.
- Concern of impact to access to Bushy Park, Mount Argus Church.
- Concern of increased congestion on Wellington Road and Whitehall Road.
- No consideration to the opportunity to use N81 and provide a park and ride at the Spawell.
- Concern of traffic modelling and use of POWSCAR data – The ERM Transport Model is not in itself sufficient.
- The submission in Chapter 6 sets out 2 pages of suggested improvement incl.
 - Removing fares from buses.
 - Replacement of bus gates with bus priority
 - Reduced land take and construction (TRS and Spawell roundabout)
 - Preserve existing cycling lanes.
 - Remove many bans on right hand turns. (Templeogue Road – Rathdown Avenue, Templeogue Road to Rathdown Park, Fortfield Road.
- Submission accompanied with report entitled 'South West Dublin and the Continuation of Metrolink – Improvement in commuting times. October 2020

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Concern no OH held.
- Resilience testing is inadequate.
- No new issues raised.

194. Pat and Eileen McMorrow (Walkinstown Road)

- Concern of proposal to widen the Grange Road into the Woodland area of Rathfarnham Castle Park.
- Concern of impact upon amenity for many people, esp. autistic children.
- Concern of excessive land take up to 10m of woodland area.
- Concern of environmental impact, impact upon habitat, biodiversity, wildlife breeding birds, frogs, bats, squirrels, tufted ducks and mallards.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No new issues raised.

195. Pat and Maire Coman (Rathdown Park)

- Concern of removal of mature trees along Bushy Park.
- Concern of environmental pollution.
- Concern of workability of the project given space constraints.
- Concern of traffic chaos, esp. in Terenure and Templeogue Village.
- Concern that the proposal is short term solution to electric trams.

196. Pat and Theresa McCaffrey (Rathgar Road)

- Concern of creation of a superhighway
- Concern of data and analysis being out of date.
- Concern of need and justification for the project.
- Concern of decimation of villages and quality of life.
- Concern of impact to resident's access to services and community.
- Concern of impact upon elderly residents.
- Concern of removal of trees.
- Concern of extinguishment of Private Right of Way / Public Right of Way (one way system on Rathgar Road)

197. Patrick and Anne Fletcher (Rathgar)

- Support changes to improve pedestrian, cycle and bus infrastructure.
- Concern of aspects of the proposal between Templeogue and the bus gate at the north end of Rathmines Road close to the canal.
- Query the need, justification and time saving involved for buses.
- Concern Victoria Road is designated as part of the cycle route given width constraints.
- Concern of the removal of the left turn lane at the junction of Zion Road with Orwell Road
- Concern of location of a cycle lane proposed on TRE and its non-continuous nature.
- Concern of no proper integrated survey of traffic implications.
- Concern of access to Victoria Road from M50
- Concern of impact upon urban villages.
- Concern of impact of additional traffic on Highfield Road.

198. Patrick O'Hagan (Rathdown Drive)

- Concern of huge cost for little return / gain.
- Concern of impact upon Terenure.
- Concern that time saving proposed does not justify the loss of mature trees, greenbelt, impact upon the environment and increased carbon emissions and noise.
- Concern of limiting access to resident's homes.
- Welcome cycle lanes and submit they need to be properly laid and continuous.

199. Paul and Marie Baird (Terenure)

- Concern of traffic congestion, delays and chaos.
- Concern of noise and air pollution.
- Concern no plan to address cross city buses through the city centre.
- Concern of justification, CBA, time saving and predicted reduction in car journeys.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No new issues raised.

200. Paul Jacobs (Rathdown Park)

- Concern of adverse impact upon family life, schools and activities.
- Concern of increased journey times for cross city necessary car journeys.
- Concern of justification and need for the project post Covid.
- Concern of impact upon communities, from CPO, removal of trees, right hand turn bans, road closures and congestion.
- Concern of access to Bushy Park
- Concern of poor consultation and lack of accountability.
- Concern benefits do not warrant the costs.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No new issues raised.

201. Paul Kavanagh (Rathgar Road)

- Concern of justification and need for the project.
- Concern of cost benefit analysis.
- Concern of congestion, mobility, longer journey times and reduced access to services.
- Concern of impact upon community, villages and heritage.
- Concern alternatives have not been considered.

202. Paula and Ray Moore (Rathgar Road)

- Concern of justification and need for the project, post Covid.
- Concern of impact upon heritage, trees and wildlife.
- Concern of impact upon Rathgar and surrounding villages.
- Concern of increased emissions, noise and loss of trees.
- Concern CPO and road widening will negatively impact architectural layout of streets.
- Concern of traffic chaos, congestion, and dispersion to surrounding residential streets.
- Concern of bus gate in Rathmines, one way traffic, right/left turn bans.
- Object to relocation of the city bound bus stop on Rathgar Road to outside no. 77 – no. 80 Rathgar Road. Relocating the bus stop to circa 95 – 96 Rathgar Road would be preferable.

- Concern alternatives, such as Metro, park and ride, introduction of school buses, cashless fares have not been considered.
- Concern traffic implications of all 12 corridors running concurrently have not been modelled.
- Concern of out dated traffic counts and traffic modelling.
- Concern that Harolds Cross Road was excluded from the project.
- Support the submission of Rathgar residents & Professor Jennifer McElwain.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Concern Census data 2016 has been used to calculate population and not Census data 2022 as used in Metrolink.
- Disappointed no OH held.
- No new issues raised.

203. Pauline Wheatley (Fortfield Drive, Terenure)

- Concern of impact upon car dependent users.
- Concern of impact to elderly and people with disabilities.
- Concern of impact upon access to Bushy Park
- Concern of traffic displacement esp. to Fortfield Road
- Concern of impact upon access to Terenure College, Our Lady's School and St. Pius X school.
- Concern of traffic safety issues.

204. Pete and Emma Smyth (Highfield Road)

- Concern of out-of-date survey work, pre covid, and increased focus on ebikes.
- Concern of lack of consideration of alternatives.
- Concern of lack of number of buses on the route.
- Concern of actual time saving achieved.
- Concern of longer car journey times.
- Concern of lack of consideration of how people will get out of town (cars, vans etc)
- Concern of impact to villages and quality of life of residents.
- Concern of impact of increased traffic on Highfield Road.

- Concern of impact upon businesses and deliveries in particular to SuperValu, with slip road closure.
- Concern of effect on trees on Highfield Road.
- Concern of effect on wildlife on Highfield Road
- Concern of noise and air pollution.

205. Peter Lynch (Rathfarnham)

- Concern of impact to properties at 55 Rathfarnham Road Terenure and in particular No.'s 51 – 71 Rathfarnham Road i.e. Pearse Bridge to the Rathdown entrance junction.
- Submission contains two reports from RW Nowlan & Associates and from NRB Consulting Engineers outlining a number of concerns and flaws
- Submit the proposed scheme should be modified to omit CPO in respect of No.'s 51 – 71 Rathfarnham Road as the works are unnecessary, disproportionate and fail to satisfy any reasonable criteria for their inclusion.
- Concern of lack of detailed design of works proposed under CPO
- Concern of lack if integrated assessment of the overall scheme.
- Concern the EIAR of the project is fundamentally flawed.
- Concern of impact upon Terenure Village, trees, residential amenity, wildlife and fauna in the area.
- Concern the proposed does not consider alternatives and is shortsighted.
- Concern of:
 - Removal of left-hand turning lane into Rathdown Park outside house nos. 51-53
 - Dedicated cycle lane to replace shared cycle/bus lane outside house nos. 51-71
 - Compulsory acquisition and loss of land to enable set back of boundary wall outside house nos. 51-71 to facilitate a cycle lane.
 - New boundary treatment to match existing outside house nos. 51-71.
 - Signal controlled priority for buses outside no. 51.

- This submission questions the necessity and benefit of the setting back of the boundary wall along the front gardens of the house nos. 51-71 on the basis that this setback does not facilitate an additional bus lane but rather a cycle lane where such a cycle lane is already available as a shared bus/cycle bus.
- Concern of impact on traffic flows and congestion.
- Concern of gradient of private dwellings and driveways.
- Concern of lack of rationale for the dedicated cycle lane.
- Concern of conflict with Development Plan zoning objective.
- Concern that the Bus Connect plans (as per the Planning Application, based on the design data provided) appear to result in a significantly steeper approach to the majority of the subject dwellings, contravening National Building Control Regulations – Part M.
- Concern the implications for accessibility to the subject houses has not been undertaken.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Concern no OH to be held.
- Failure of the NTA to address any issues raised in the original submission.
- Submission attached with updated RW Nowlan Planning Consultants Report dated March 2024 & NRB Consulting Engineers updated letter dated March 2024.
- No new issues raised.

206. Peter Thornton and Helen Callanan (TRE, Rathgar)

- In assessing the application made by the NTA, ABP needs to have regard to the submissions made to the NTA in the course of the public consultation process.
- In particular, reliance is placed on the expert reports/submissions submitted to the NTA on behalf of the following:
 - Rathgar Road Residents' Group (Kieran O'Malley & Co Ltd dated 30 April 2019);
 - Terenure Road East Residents' Group (Tom Philips and Associates);

- Professor Jennifer McElwain Professor of Botany (1711) Head, Botany Department Trinity College Dublin College Green Dublin 2 (dated 28 April 2019);
- Sworn statement of Greg Turley dated 14 December 2020 together with the report of Ronan Hannigan, chairman of the Eco Restoration Trust dated 15 December 2020 which were submitted to the NTA;
- Dr Martin Rogers, who also compiled a report on Terenure Road East on behalf of Michael O'Donoghue SC;
- Mr Peter Twamley, a resident and member of the Urban Design Committee of the RIAI among others
- Concern valuable mature trees are still to be felled along Terenure Road East, including at No.59 Terenure Road East.
- Concern of impact upon Rathgar, residential area of historical and heritage significance.
- Concern of lack of consideration of cumulative impact incl. environmental impact.
- Concern of justification and valid CBA.
- Concern of failure to consider Harolds Cross Road as a route into the city.
- Concern of failure to consider impact upon protected structures.
- Concern of absence of traffic modelling and traffic dispersion to adjoining roads.
- Concern of lack of consideration of alternatives, an alternative route (along Harolds Cross Road) being discounted, pinch points remain which are an insuperable objective of achieving shorter journey times.
- Concern of safety, air pollution, impact upon environment, quality of life of residents, impact on village atmosphere, heritage and character, impact upon property values.
- Concern of longer car journey times.
- Concern of project splitting and inadequacy of public consultation in relation to routes considered. ABP will be required to assess the legality of the NTA approach (and ultimately it will be a matter for the courts to decide - all rights are reserved in that respect).
- Support the submission of Diarmaid McGuinness (Auburn Villas)
- Concern that there is no evidence of a stronger demand for a bus along the Rathgar Road/Rathmines Road when compared to Harold's Cross Road.
- Concern of flawed route selection in particular in relation to the exclusion of the Harolds Cross (R137) route.

- Concern modelling is flawed and ABP cannot be in a position to determine that the proposal is acceptable, safe, workable or necessary.
- **Request an OH**

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Support the submission of Rathgar Residents Association and TRE Residents group.
- Concern no OH to be held.
- Concern data is outdated.
- No new issues raised.

207. Philip and Sally Berman (Leinster Road)

- Concern of lack of consideration of alternatives in particular congestion charges.
- In London the congestion charge was aided with high quality alternatives to driving to work.
- Research from Sweden indicates that introducing congestion charges can reduce urban car traffic by up to 33 percent.
- Concern separating cyclists from buses has not been adequately considered.
- Cost of implementing a congestion charge would be substantially less than the current enormously complex proposal.
- Concern of impact upon the community of Rathmines, both businesses and community interaction.
- Concern of financial justification.
- Concern of environmental and climate costs.
- Concern of disruption during construction of the scheme.

208. Philip and Vivienne Mayne and Jacky Mayne (Templeogue Road)

- Support the proposal in principle.
- Concern that public consultation process was flawed.
- Concern of accurate supported survey data and assessment of the age profile and occupation of the inhabitants of Terenure Village.
- Concern of traffic displacement.
- Concern of the Bus Gate on Templeogue Road.

- Concern for those properties which have car access within the Bus Gate such as 19 Templeogue Road, no clarity on access.
- Concern of provision of services with the Bus gates.
- Concern of time of operation of Busgates.
- Concern of access to Saint Lukes Hospital Highfield Road, access to educational facilities.
- Traffic through Terenure Place could be reduced by introducing a Bus Gate on Terenure Road West close to the Garda Station.

209. Philip Elliott, Elliott's Food Service (Montague Street)

- Concern of the construction of a new loading bay directly outside The Camden, as it will detract from the protected structure status.
- Concern of narrowing of the footpath, welfare concerns for patrons and pedestrians.
- Concern of traffic displacement to surrounding streets such as Heytesbury Street.
- Concern of removal of a loading bay from west side of Wexford Street and impact upon Camden Street.
- Concern of lack of traffic management plans.
- Calls for the introduction of an integrated heavy and light rail network that covers all suburbs.

210. Philip O'Reilly (68 Gandon Close)

- Concern over the viability and need for the proposal.
- Concern that Bus connects is not the solution a Metro system is needed.
- Concern of serious environmental destruction and loss of trees.
- Concern of impact upon historic built heritage.
- Loss of boundary walls, boundary railings and front gardens.
- Concern over routes connections proposed and journey times.
- Concern of traffic grid lock and chaos resulting.

211. Philip O'Reilly (18 Grosvenor Place)

- Query the justification, cost benefit and need for the proposal.
- Concern of very little benefit resulting in an overall serious negative impact.
- Concern that similar proposals to transport issues were imposed in DUBLIN in the past and resulted in dereliction and destruction.
- Loss of historic built fabric in the area of Rathfarnham and Terenure.

- Loss of residential amenity and front gardens of residences for no benefit.
- Concern of loss of mature trees and greenery.
- Provision of an underground metro is needed.
- Concern of waste of money on an environmentally destructive scheme.

212. Ranelagh Village Improvement Group

- Recognise the time, effort and resources gone into Busconnects initiative.
- Acknowledge transport planning is difficult and fraught.
- Acknowledge the current period of climate change and other environmental and social challenges.
- Concern of negative impact upon urban historic, social, heritage and architectural villages in particular Ranelagh.
- Concern of the impact of the proposed Busgate in Rathmines and traffic dispersion and significant increased traffic flows through Ranelagh Village.
- Concern the public consultation process was flawed.
- Concern of right turn bans on traffic into Ranelagh Village from a southerly direction.
- Concern of elimination of right turn from Ashfield.
- Concern of safety of children walking to local schools from increased traffic.
- Concern for justification and time saving of the project.
- Concern that the Sandyford Clonskeagh to Charlemont Street Pedestrian and Cyclist Improvement scheme has not been considered during the assessment of the project.
- Concern the project is detrimental to other plans by the NTA to encourage more 'walking / cycling' 'to schools' policies of the NTA.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Concern that the NTAs response to submissions is deficient.
- Concern consultation process is flawed.
- Concern of turn Bans and impact upon residents of Merton Drive, Beechwood Avenue, Edenvale Road and Mountainview Road.
- No new issues raised.

213. Rathfarnham Castle Residents Association.

- Concern of impact to Castleside Drive residents.

- Concern of CPO of a large strip of the Rathfarnham Castle Park
- Concern of removal of roadside trees, boundary wall and entrance to grounds / park opposite Yellow House.
- Concern of loss of woodland area and consequent negative impact to biodiversity and people using the Park.
- Query the necessity of an additional out bound bus lane. Bus priority signals could be an alternative solution.
- Concern of climate change and impact due to loss of mature trees.
- Concern of impact to flora and fauna
- Concern of landscape and visual impact
- Concern of noise, vibration and air quality.

214. Rathfarnham Wood Residents Association

- Concern of environmental effects and loss of parkland (Rathfarnham Castle Parks Woodland)
- Concern specifically with respect to the section of CBC from the junction of Grange Road with Nutgrove Avenue to its junction with Butterfield Avenue, being approx. 450m at the very start / end of the CBC.
- Concern of the need and justification for the project.
- Concern of impact to tranquillity of parkland, biodiversity, wildlife, play space, use by people with autism and sensory issues, and children.
- Concern of pedestrian, traffic, and cycle safety.
- Failure of documentation to identify a material watercourse – the River Glin / Whitechurch Stream – impact upon this water course has not been carried out.
- Concern a watercourse is proposed to be built over.
- Concern IFI have not been given opportunity to comment / assess impact upon this river.
- Concern of impact upon hydrology and the environment & lack of assessment of same.
- EIAR, NIS and other scheme documents display material deficiencies by not considering the Glin River
- Concern of inadequate hydrology and hydrogeology surveys.
- Concern Rathfarnham Castle Park has not been included in hydrology report.
- Concern of negative impact to biodiversity and lack of assessment.
- Concern of loss of trees.

- Concern of loss of two bat roosting trees.
- Concern of impact to breeding birds.
- Destruction of boundaries and walls.
- Alternative design solutions not considered.
- Concern of breaches of the Habitat Directive
- Concern of breaches of Water Framework Directive.
- Concern of cumulative impact of in combination effects.
- Concern of cost benefit of the proposal.
- Concern of lack of clear information / informed public participation.
- Concern of negative impact to parkland, landscape and visual impact.
- Concern of excessive land take from the park.
- Concern of noise and vibration, air quality, soils and geology and climate.
- Concern of hydrological connection to two Natura sites, has not been assessed. The Wicklow Mountains SAC and the South Dublin Bay SAC.
- Concern that the Whitechurch Stream is an acknowledged Otter habitat.
- Concern of the absence of survey of wintering birds.
- The bus corridor should cease at the end of the dual carriageway beside Rathfarnham Village (at the junction with Butterfield Avenue) rather than extending by 450m past the park. Bus priority for outbound buses could be achieved by utilising a bus priority signal.
- Concern of lack of adequate footpath or continuous cycle lanes and infrastructure in the Rathfarnham village and Nutgrove Avenue area.
- Concern of public participation in the proposal and Aarhus Convention – flawed process.
- Concern of the description of the boundary wall from Nutgrove Avenue as far as Willbrook Road (c 200m).
- Concern of the true amount of land and trees to be taken / removed. Documentation is misleading.
- Concern of the validity of the whole process given incorrect dates initially stated on certain documents.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Concern of impact upon Rathfarnhan Castle Park which is important at a local scale.

- Concern lands on the opposite side of Grange road were not considered by the NTA.
- Response by the NTA to submission is inadequate.
- No new issues raised.

215. Rathgar Business Association

- Concern of consultation process and lack of engagement with NTA.
- Query the need and justification for the proposal.
- Concern many historic buildings and architectural features will be lost.
- Concern of impact upon historic urban villages and fabric of Dublin.
- Concern of access for deliveries to businesses.
- Concern of loss of trees.
- Concern it brings no benefits for Rathgar

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Support the submission of Rathgar Residents Association.
- No new issues raised.

216. Rathgar Medical Practice

- Concern of impact upon the GP practice and loss of access for patients.
- Concern of impact to business of the practice.
- Easy access for elderly patients and patients with mobility issues is necessary.
- Concern of loss of access to car parking.
- Concern of need for the project, in light of changing behaviour since covid.

217. Rathgar Residents Association

- Concern of destruction of built historic heritage.
- Concern streetscape and public realm of the Rathgar Area will be lost.
- Concern of negative impact to Rathgar historic urban village.
- Query justification and gains to bus times.
- Concern the consultation process was not inclusive of all residents. Online consultation process (carried out even when the Covid pandemic restrictions were lifted) was challenging.
- Concern of heritage, trees, and wildlife.

- Outdated road widening based upon outdated traffic count data from Nov 2019 and February 2020.
- Concern of impact to Highfield Road and surrounding residential streets.
- There is a need to trial the proposed traffic changes.
- Concern that this is a short-term solution as opposed to long – term projects such as rail and Luas.
- Concern no actual effort is made to take cars out of the system. No new park n’ ride facilities proposed.
- Concern traffic implications of all 12 corridors running concurrently has not been modelled let alone trialled in real time.
- EIA is flawed as it does not take account of other bus corridors.
- Concern of failure to comprehensively consider the Harolds Cross Road – undermines the project.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Concern the response by the NTA to submissions made is deficient.
- Concern traffic modelling and data is flawed.
- Disappointed no OH held.
- Concern Census data 2016 has been used to calculate population and not Census data 2022 as used in Metrolink.
- No new issues raised.

218. Rathmines Parish

- Concern of impact to access for parishioners of the Church of Mary Immaculate Refuge of Sinners, Rathmines Road, D6.
- Concern of regard for age friendly and family friendly strategies.
- Concern the proposal meets the objectives of the NPF and Regional Spatial and Economic Strategy for the Eastern and Midland Assembly, with regard to ageing population.
- Concern of impact upon places of worship. The church is located on lands zoned Z15.
- Concern that vehicular access is maintained to the Church from Rathmines Road to provide access for funerals, weddings and other church events.
- Reassured and welcome that access to Church car parks on Rathmines Road and from Richmond Hill will be maintained.

- Request that the hours of operation of the Bus Gate on Rathmines Road be reconsidered to 6am – 9am and 4pm – 8pm.
- Welcome benefits of the Busconnects programme
- Recognise the improved public transport and benefits for parishioners.

219. Recorder Residents Association (Whitehall Road)

- Concern the consultation process was not inclusive of all residents, fundamentally flawed.
- Concern that route options 'A', 'F' and 'D' will negatively impact upon neighbourhoods and daily lives.
- Concern cumulative impact has not been adequately assessed of route options 'A', 'F' and 'D'.
- Concern of cross city bus route, continuation of buses to the north side of the city, solution is not part of the project.
- Concern of the function of the core corridor.
- Concern of:
 - Closure of the Templeogue Road (Busgate) 14 hours per day x 365 and displacement of some 7,000 vehicles a day.
 - Closure of Rathmines Road (Busgate)
 - Diversion of traffic via Castlewood Avenue
 - One-way inbound system on Rathgar Road and impact upon Highfield Road and Upper Rathmines Road.
 - Change to signalised junction at Spawell Roundabout
 - Numerous right turn bans
 - The removal of 1 of the outbound bus stops on Georges Street.
- Concern of cross city and orbital journeys.
- Concern of justification of the project in terms of cost and time saving achieved.
- Concern of number of buses on each corridor, capacity issues and frequency.
- Consideration of underground option should be explored.
- Concern Metro option ignored.
- Concern that park and ride facilities are not incorporated.
- Concern of failure to consider alternative options.
- Concern traffic modelling is deficient and cannot be relied upon.
- Concern of loss of 300 year old mature trees.
- Concern of impact on Terenure Road East and destruction of character of Terenure Village.
- Concern of imbalance in relation to common good.

- Concern of distance between bus stops. No outbound bus stop at the garda station in Rathmines.
- Concern carbon emission will be increased.
- Request that a feasibility study on the south west area be carried out and evaluated.
- There is a need for more introduction of local link routes, cashless payments, dedicated school buses, monitoring of bus priority.
- Suggest evening Busgate closure on lower Kimmage Road should be shortened to 4 pm to 7 pm to facilitate businesses and nighttime economy and taxis.
- Concerns raised by Cheeverstown House, represented by Cheeverstown House Employment Support Services on 198 Whitehall Road, of impact to people with intellectual disabilities living in south west Dublin.
- Concern pedestrians are required to cross over cycle lanes to get on and off a bus.
- Concern of the changes to bus routes and loss of direct bus routes for people with disabilities.

220. Residents of 51 – 71 Rathfarnham Road

- Concern of impact to properties at No.'s 51 – 71 Rathfarnham Road, along the western side of the road.
- Submission contains two reports from RW Nowlan & Associates and from NRB Consulting Engineers outlining a number of concerns and flaws.
- The issues raised in the reports have already been raised / submitted by Peter Lynch (Rathfarnham) and are summarised above at submission 205 of this report.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Updated report by RW Nowlan & Associates on behalf of the residents of 51 – 71 Rathfarnham Road, March 2024.
 - It is submitted that the NTAs response does not address issues raised with respect to traffic congestion south of the junction with Rathdown Park.

- Additional information should be sought with respect to cross sections indicating dimensions, datums on a 'before and after' basis – gradient of private dwelling driveways.
 - No new issues raised.
- Original Report dated July 2023 and Updated letter by NRB Consulting Engineers, March 2024.
 - It is submitted that the NTAs response does not address issues raised with respect to compliance with Part M of the Building Regulations.
 - Additional information should be sought with respect to cross sections indicating dimensions, datums on a 'before and after' basis – gradient of private dwelling driveways.
 - Suggests that a comprehensive design for pedestrian and vehicular access from the public road to the door of each house, that meets the part M requirements, should be provided demonstrating to ABP and each resident that this has been adequately addressed.

221. Residents of Brighton Road and Brighton Square

- Request that traffic calming (planters / benches / raised tables Zebra crossings) measures be introduced along the length of Brighton Road to reduce the speed of vehicles driving through and discourage the use of Brighton Road as a short cut and avoid rat running.
- As a second preference a one-way system could be put in place restricting traffic entering Brighton Road from TRE.
- Concern of safety of residents, pedestrians, and users of Brighton Road.
- Request that Brighton Road is designed to passively calm traffic through the creation of self – regulating street environment that is suited to all users, incl. pedestrians and cyclists.

222. Residents of Fortfield Road

- Concern of impact of increased traffic on Fortfield Road and its environs.
- Con of impact of turn bans will cause rat running, increase traffic on residential roads and cause congestion and traffic safety issues.
- Concern of loss of local access to schools, services, amenities, the park.
- Concern of impact of proposed inbound bus gate on Templeogue Road adjacent to Ferguson Road.

- Concern of extra traffic on Fortfield Road and adjacent roads.
- Concern of restricted access to Bushy Park.
- A right turn ban into Rathdown Avenue should not apply post morning peak, so locals can access the Park.

223. Residents of Greenlea Avenue, Drive and Park

- Concern of road restrictions and impact to locals (incl. resident of Greenlea and Parkmore area) trying to access their homes and businesses.
- Concern of inbound traffic on the Templeogue Road turning onto Fortfield Road and accessing Greenlea Road.
- Concern of impact of 24 hour bus gates on Templeogue Road near Olney Crescent.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Reject assertion by the NTA in their response that no material traffic will be diverted into Greenlea Avenue area.
- Note page 72 of the NTAs response showing a very long detour (via Templeville Road, Wainsfort Road and a right turn into Fortfield Road)
- Diverted traffic is not a mere inconvenience.
- No new issues raised.

224. Residents of Greenlea Road

- Concern of 24/7 right turn ban from Fortfield Road into Greenlea Road this will give rise to difficulty for local residents to access their homes, services, local amenities and cause congestion and environmental pollution.
- Concern for elderly accessing services, not all residents can cycle or walk to local services.
- Concern Bus gate on Templeogue Road will cause major disruption for the village of Terenure
- Query the time saving proposed.
- Concern of cumulative consideration of all proposed bus corridors has not been carried out.

- Concern of proposed right turn into Terenure Road East for public transport only.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Same response as to Residents of Greenlea Avenue, Drive and Park, see above.
- No new issues raised.

225. Residents of Laverna Grove and Laverna Road

- Concern of increased volume of traffic on residential roads
- Concern of air pollution from cars,
- Concern of safety for pedestrians
- Concern of danger for cyclists
- Concern of lack of policing for no right turns

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Same response as to Residents of Greenlea Avenue, Drive and Park, see above.
- No new issues raised.

226. Residents of Mountpleasant Area

- Broad support for the project.
- Welcome the filtered permeability proposal on Mountpleasant Avenue Lower.
- Request that the proposed re-introduction of a vehicular right-turn from Richmond Hill into Mountpleasant Avenue Upper is not implemented, on traffic safety grounds.
- Concern that the proposal does not comply with minimum standards (for road width and footpath widths), DMURS Guidelines and objectives.
- Concern the proposed shuttle system would compromise pedestrian and cyclists safety.

- Concern that information provided by NTA for the proposal was late to the process, lacks detail, is inconsistent and misleading and lacks proper detailed information for accurate assessment to be made.
- Concern of lack of appropriate public consultation in relation to re-introduction of a vehicular right-turn.

227. Residents of Mountpleasant Avenue Lower

- Commend the decision to close off Mountpleasant Avenue Lower to cars, while allowing bicycles to traverse the area.
- By implementing traffic calming measures and reducing vehicular access, local families and wider community can enjoy a more peaceful and secure environment.
- Welcome improvement in road safety and reduction in localised pollution, with fewer cars rat – running, idling, and releasing harmful emissions.
- Believe that the proposed initiative will greatly encourage the use of public transport and facilitate cycling.
- Proposal is necessary in meeting and exceeding national targets for carbon emissions reduction, helping to combat climate change and preserve the planet.
- Proposal showcases the value of prioritising environmental concerns and sustainable urban planning,

228. Residents of Parkmore Drive, (Terenure).

- Welcome the provision of better bus routes and corridors.
- Concern of turn bans, in particular prohibition from turning right from Fortfield Road into Greenlea Road.
- Concern of operation and hours of operation of the proposed Bus gate on Templeogue Road adjacent to Ferguson Road.
- Concern of traffic congestion on Terenure Road West
- Concern of access to Bushy Park – right turn ban into Rathdown Avenue should not apply post morning peak, so locals can access the local park.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Same response as to Residents of Greenlea Avenue, Drive and Park, see above.
- No new issues raised.

229. Residents of Terenure Road West (TRW)

- Concern of Traffic congestion and delays.
- Concern Busconnects proposes to use bus gates to direct further traffic onto Terenure Road West (TRW)
- Concern of age of population in the Terenure area and their need to use their cars for medical and hospital appointments.
- Concern of environmental pollution from congestion.
- Concern of impact to local and residents needs such as shopping, accessing services, amenities or visiting friends.
- Concern of access for emergency services.
- Rights of people to have reasonable access to public roads.
- Concern of loss of trees and negative visual impact upon Terenure Village.

230. Residents of The Cloisters & Maple Drive Area

- Whether the proposed corridor meets community need or public interest.
- Environmental concerns
- Traffic diversion and impact upon minor roads in the wider area.
- Whether cycle lane provision requires to be linked to the CBC proposal
- Improved frequency and punctuality of the existing service and introduction of a free or reduced fare structure would be preferable.
- Concern that it will not deliver sufficient time saving on journeys.
- Concern of loss of bus stops.
- Concern of increase in walking distance to bus stops for residents and community.
- Concern of blocked left / right hand turns, access to certain areas, traffic congestion.
- Concern of enforcement of traffic flow.
- Concern of loss of trees.

- Concern of loss of access to amenities, shopping areas, parks, leisure centres and the Hospice at Harolds Cross.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No new issues raised.

231. Residents of Upper Rathmines Road

- Concern of Rathgar Road being one – way.
- Concern that traffic will be pushed to surrounding residential roads not suited for such traffic (8,000 cars and 500+OGV's)
- Concern of congestion and chaos.
- Concern of congestion, noise, pollution, and danger.
- Alternatives to the proposal need to be examined, disproportionate consequences for minimal time saving.
- Concern quality of Bus service for Rathmines will be adversely impacted / diminished.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Find the response to submissions unsatisfactory and lacks credibility.
- Data is questionable and lacks credibility.
- No new issues raised.

232. Ria Duignan (Lissenfield)

- Concern of location of 'bus gate' immediately adjacent to the entrance to Lissenfield.
- Concern of prohibition on right turning movements, from the entrance to Lissenfield onto Rathmines Road Lower.
- Concern of impact of Bus connects project on meals on wheels delivery in the area, specifically from St. Mary's Community centre located behind the church on Lower Rathmines Road.

- Request the bus gate be omitted or relocated or not operate between the hours of 10.00 and 14.00 Monday - Friday.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No new issues raised.

233. Richard Carroll (Glendown Close)

- Concern of the impact of the project upon communities, businesses and quality of urban village life.
- Concern of lack of consideration of alternatives.
- Concern of impact upon alternative modes of transport.
- Concern the wider needs of a large proportion of citizens living in the area are not taken into account.
- Concern of impact upon elderly and mobility impaired.
- Concern of justification, scope, need and CBA for the project.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No new issues raised.

234. Rita Delahunty (Villiers Road)

- Concern of impact of proposal on Castlewood Avenue Junction with Upper Rathmines Road.
- Concern of impact of proposal on Upper Rathmines / Highfield Diversion – traffic dispersion to Villiers Road, Neville Road and Templemore Avenue.
- Concern of impact upon residents of closure of Rathgar Road to outbound traffic and the introduction of the proposed Busgate on Lower Rathmines Road.

- Concern proposed right turns at Highfield Road / Rathgar Road Junction will cause delays.
- Concern that the widening of Highfield Road is not provided for in the proposal.
- Concern of the level of traffic which will be displaced onto Highfield Road.
- Concern an up-to-date assessment of traffic volumes using Highfield Road, Upper Rathmines Road and Rathmines / Castlewood Avenue junction has not been submitted.
- The proposal is premature and lacking information.
- Concern of times saving is insignificant give the level of disruption, inconvenience and permanent damage to ecology, built environment, amenity and local community life.

235. Rita O’Cleirigh (Grosvenor Place)

- Concern of impact upon Rathgar and urban villages and local communities.
- Concern of impact upon heritage, trees and wildlife.
- Concern of emissions, increased traffic flows and loss of car parking.
- Concern of overwhelming Rathgar Village.
- Concern Harolds Cross would have inadequate public transport.

236. Robin Jones (TRE)

- Concern of impact upon built heritage and of loss of character.
- Concern of loss of mature trees dating to 1870’s
- Concern of limiting car traffic, traffic congestion and overspill / diversion onto adjoining roads.
- A consolidated traffic impact assessment is required.
- Query the need and justification for the proposal.
- Negative impact to villages and communities of Terenure and Rathgar.

237. Roisin Kennedy and Andrew Folan & Others (Lower Mountpleasant Avenue)

- Concern of lack of public consultation
- Concern of restricted vehicle access to Rathmines, in particular for elderly and parisioners of Church of Mary Immaculate Rathmines.
- Concern of increased traffic on minor roads

- Concern of impact to pedestrians, consumers, services providers, community facilities and public facilities in Rathmines.
- Concern on impact to businesses.
- Concern of loss of car parking spaces.
- Concern of loss of trees, destruction of environment and gardens.
- Concern of destruction of communities.
- Concern for need and justification of the project.
- Concern of destruction of the historical built environment, incl. removal of Victorian railings and front gardens.

238. Ronan and Siobhan Garrigan (Lavarna Road)

- Concern to 'no right turn' from Fortfield Road to Lavarna Grove.
- Concern of impact to residents of Lavarna and Terenure Road West.

239. Rory and Cliona Carton (Highfield Road)

- Concern of traffic congestion.
- Concern for safety of cyclists and pedestrians on Highfield Road.
- Rathgar Road should remain open to two – way traffic and failing this to retain the current road restrictions preventing cars turning from Upper Rathmines Road onto Highfield Road.

240. Rory and Margaret Crerar and Others (Church Lane)

- Concern to the proposed construction compound TR3 in the green area between Dodder View Road, Church Lane and Woodview Cottages, Rathfarnham.
- This area was used as a temporary depo for Dodder Greenway works, its continued use as a depo is unwarranted.
- Concerns in relation to:
 - Loss of public amenity
 - Impact upon residents (dust, traffic, nighttime lighting)
 - Flooding Impact – area is a flood plain.
 - Negative impact upon archaeology and heritage
 - Damage to biodiversity (destroying grassland area by filling, accommodating large commercial vehicles, habitat loss)
 - Negative impact to business in Rathfarnham village and historical Rathfarnham Castle & Park
 - Danger to public safety
- Suggest an alternative non-residential location be explored.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No new issues raised.

241. Rosemary and Roger Conan (Highfield Road)

- Object to proposal to impose a Bus Gate on Rathmines Road to the Canal.
- Concern of prohibition of vehicular access.
- Concern to impact upon services such as Rathmines Catholic Church.
- Concern of diversion of traffic.
- Concern of limitation of private car on Rathmines Road.
- Underground route should be considered.

242. Rosemary Ryan (Hannaville Park)

- Concern of loss of mature trees.
- Concern of compromise to cycle lanes.
- Concern that linked trips by parents on way to creches, schools, work etc would be unworkable.
- Concern of impact to neighbourhoods, communities, and villages.
- Concern of impact to elderly.
- Concern as to the need and justification of the project.
- Process is of engagement with public by NTA is undemocratic.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No new issues raised.

243. Rosmary Steen (Richmond Hill)

- Concern of traffic displacement due to Busgate in Rathmines.
- Concern of road safety on Richmond Hill.
- Concern of increase in noise, air pollution and traffic volumes 24/7.
- Concern of traffic congestion and tailbacks.
- A right turn should be allowed up Mount pleasant Avenue from Richmond Hill.
- Concern local residents are not allowed access via moveable bollards or the provision of keys to the bollards in case of emergency on Richmond Hill.

- Concern of lack of traffic management on the road.

244. Saint Judes Mens Shed Club (Templeogue)

- Supportive of positive improvements for cyclists and pedestrians.
- Concern of traffic congestion and access to services.
- Concern of access to emergency services and resultant health and safety issues.
- Concern of access to services generally for the elderly (Meals on wheels, emergency repairs etc)
- Concern of access for elderly to recreational facilities.
- Concern that the proposal is contrary to proposal for better connected communities and enhanced quality of life.
- Concern of loss of existing bus routes in particular route 150

245. Sean Crowe TD (Greenhills Road)

- Concern of removal / demolition of 380 m of existing boundary wall at Rathfarnham Castle.
- Replacing the existing wall with a rendered wall is inappropriate.
- Concern of removal and loss of mature trees.
- Concern of impact upon wildlife and biodiversity
- Concern of impact to protected species of birds and Bats.
- Concern of impact to underground historic passageway that connects Rathfarnham Castle to an old orchard.

246. Sean Leake and Morina Carr (Greenlea Grove)

- Concern of traffic congestion and chaos due to traffic dispersion and diversion.
- Concern of lack of cumulative assessment of adjoining busconnects schemes.
- Concern of justification and need for the project.
- Concern alternatives not considered, and the proposal is outdated.
- Concern of impact upon TRW.
- Concern of traffic safety, bus gates, right turn bans, extended car journey time for residents.
- Concern of impact upon built heritage.
- Concern of impact upon Bushy Park.
- Concern of negative impact upon Terenure.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No new issues raised.

247. Sean Silke (TRE)

- Concern of traffic congestion
- Negative impact on Terenure village and local communities.
- Loss of mature trees
- Unfair and undemocratic consultative process – Covid – 19 pandemic.
- Concern that the proposal is properly costed. A CBA is required.
- Concern that Bus Connects scheme is not the solution to Dublin transport issues.
- An underground metro should be considered as a long term solution.
- Concern of loss of built heritage and historic Dublin.
- Concern that the proposal is not justified, properly trailed or necessary.
- New Right turn at Terenure Cross from Rathfarnham Road towards Rathgar via Terenure Road East needs to be reconsidered.
- Concern of loss of car parking.
- Concern to cycle arrangements proposed. Diversions are not credible.
- Concern of spill over traffic and diverted traffic flow on local roads.
- Full implications of the bus gate and one-way system proposals needs to be assessed.
- Vulnerable elderly people affected by possible CPO's.
- Integrated traffic modelling for each of the routes Templeogue / Rathfarnham to city centre, Kimmage to city centre and Tallaght / Clondalkin to city centre is required.
- It is premature to consider the approval of a CPO, since the scheme does not have planning permission, nor have the NTA established that there is a need for the scheme.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- NTAs response to submission is inadequate.
- The scheme is unnecessary, bus priority signalling approach – already in place and operating successfully, will do the job just as well as zero cost.

- Integrated traffic modelling for each of the adjoining CBC routes required.
- No new issues raised.

248. Senator Mary Seery Kearney (Templeville Road)

- Flawed initial premises.
- Concern of proportionality, cost, CPO, build cost, consultancy, design, legal fees.
- Key measures are efficiency, safety, integration, sustainability.
- Concern that the cost and reduction in quality of life and environmental impact far outweighs any theorised improvements.
- Concern of tree removal - at Rathfarnham Castle Park, Rathfarnham Road, Templeogue Road and at Rathgar Road.
- Concern of considerable woodland take at Rathfarnham Castle Park.
- Concern of impact upon wildlife and biodiversity.
- Concern of impact on Whitechurch Stream which runs under the Grange Road into the Park where it feeds and drains the duck pond and exits again close to Butterfield Avenue.
- Concern a proper hydrological assessment of the stream has not been carried out.
- Concern of impact upon a very important public amenity, particularly for local autistic children and families.
- Concern of traffic dispersion, increased volume of traffic and congestion to surrounding residential roads.
- Concern of reduced access to traditional thoroughfare roads.
- Concern of environmental pollution from congestion.
- Concern cumulative impact of all the bus corridors has not been carried out.
- Concerns for pedestrians regarding the diminution in safety at evening and night time brought by the introduction of LED lighting.
- Welcomes the delivery of cycling infrastructure.
- Concern segregated cycling tracks are not continuous along the CBC routes.
- Concern there will be no cycle lanes on Terenure Road East.
- Concern that a minimum of 2 meters cycle track width is not reached throughout whole sections of the proposed cycle tracks.
- Concern alternatives such as congestion charges, subsidised or free bus services and a proper on street or underground metro system has not been considered.

- It is not just residents in these suburbs who use public transport, people coming to Dublin for matches, music gigs, hospital appointments and a plethora of other reasons also come to Dublin and a significant portion come by car.
- Concern of reduced accessibility due to bus gates and right hand turn bans.
- Concern that the 54A bus route as it was, proposed now as the F1, will be removed from its route along Templeville Road.
- Concern of impact to Fortfield Road.
- Concern of flawed public consultation. The NTA has left themselves wide open to a challenge under the Aarhus Convention for a failure to properly engage in public consultation.
- Concern bus drivers were not consulted with.
- **Request that an OH be held.**
- Concern of removal of bus stops:
 - Outbound bus stop at Westbourne Road removed
 - The inbound bus stop at Lakelands Park will be removed
 - The two bus stops at Our Lady's will be consolidated into one with no bus shelter. These are busy stops for children alighting to go to school.
 - Bus stop at Rathmines Park inbound and outbound removed. It will be necessary to walk to Circle K
 - Bus stop at Garville Ave inbound removed to Winton Avenue
 - Outbound bus stop at Brighton Road removed.
 - Inbound bus stop near Brighton Road moved to Rathgar village.
- Concern that the bus stop on Templeogue Road at Bushy Park and Terenure College is being consolidated with the bus stop currently opposite Springfield Road.
- Concern the bus stops on the Rathfarnham Road are being changed.
- Concern that the traffic counts that form the basis of these plans have not been updated since before the covid pandemic.
- Concern of traffic modelling data presented.
- No one believes the modelling when it forecasts a reduction of traffic in the section of the Tallaght Road between the M50 and the Spawell.
- Concern of proposed bus gate at Templeogue Road.
- Concern of equality of access for the people with mobility issues and the elderly.
- Concern of access to St. Lukes Hospital and Bushy Park.
- Concern of impact upon built heritage –

- Concern of loss of trees.
- Concern of impact upon businesses in Terenure and Kimmage/Sundrive as well as the residents in a small triangle of residential roads whom will be disproportionately impacted by the implementation of the Greenhills/Crumlin, Kimmage and Templeogue CBCs.
- Concern of actual time saving on bus journeys proposed.
- The submission sets out 3 pages of 'specifics of the route that have not been addressed or where congestion and inaccessibility will be at its height.'
Relates to access to villages and supermarkets, shopping centres, disparity between routes, access to PO in Templeogue Village, St. Pius X Church, increased volume of traffic at junction of Fortfield Road with Wainsfort Road and the estate called The Orchard. The plan to turn Rathgar Road into a one-way system is draconian and unnecessary. Concern of vol of traffic on TRW and access to schools.
- Concern that the traffic restrictions being brought to Rathmines will effectively lead to the closure of the church.
- Concern that busroutes will affect climate change while causing traffic chaos that will increase air pollution, reduce footfall to businesses and inadequately deal with the need to provide complete cycling infrastructure.
- Changing the times of the bus gates would be of great assistance in getting local support and this one change alone would have the effect of supporting less traffic diversions, less rat run trips and significant traffic flows.
- A broad acceptance without detailed explanations of your reasoning for acceptance or rejection of the entirety or the individual elements of the scheme will not be acceptable.
- Concern that there are conflicts in base plans and contradictions across plans supplied for those affected by CPOs.

249. Senator Michael McDowell (Leinster House)

- Concern of impact upon non bus traffic in the form of lorries, vans, cars and motorcycles.
- Concern of traffic congestion at peak times.
- Concern of severe congestion to residents for whom improved bus transport does not meet their needs.
- Query the need, justification and collateral damage of the project.
- Concern of one way traffic regime for Rathgar Road
- Concern of bus gate at Rathmines Road Lower

- Concern of traffic diversion, due to congestion on Castlewood Avenue/Belgrave Square/Charlston Road.
- Concern of right-hand turn bans, esp. at into Ranelagh village
- Concern of reduction of traffic to two single lanes with no filter at the Ranelagh / Chelmsford Road junction
- Concern of adequacy of the environmental impact study.
- Concern of reduced car access to city centre by residents from Rathgar, Rathmines and Dartry.
- Failure to carry out EIA makes the proposal unlawful.
- Concern of the removal of the 18 bus route – from Ballyfermot to Sandymount.
- Endorse the submission by The Ranelagh Village Improvement Group.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Decision not to hold an OH is inappropriate.
- Fundamental failure by NTA to strike a sensible balance between the needs of cyclists and general traffic.
- False ideological prioritisation for the requirement of cycle lanes.
- Combined effect of all of the proposed traffic restrictions will lead to traffic chaos, in particular the Rathmines Busgate.
- Failure to address issues and concerns will lead to judicial review.
- Submission accompanied with Ranelagh Community Response submission.
- No new issues raised.

250. Sharon McCaffrey (Greenmount Lawns, Terenure)

- Concern of impact upon local residents, community and heritage.
- Concern of traffic impact, hazard and chaos.
- Query the need for the project.
- Query the justification of the project.
- Concern over proposal to turn Terenure / Rathgar / Rathmines into a one-way in-bound traffic system.
- Concern of impact upon communities.
- Concern of reduction in number of bus stops.
- Concern of congestion and rat runs.
- Concern of negative impact for local residents.
- Concern of destruction of villages, communities, and local life.

- **Request that an OH is held.**

251. Shauna and Ray Clarke and Others (Olney Crescent)

- Concern of proposed restriction for cars travelling towards Terenure Village.
- Concern of traffic congestion.
- Concern of diversion of traffic to surrounding roads.
- Concern of enforcement of traffic layout and signals.
- Suggest to move the bus gate from Olney further away from Terenure Village.
- If the proposed bus gate is not changed, the hours of operation (and the left-hand turn ban from Olney) should be limited to peak times. The proposal is operate the bus gate from 6am to 8pm, 7 days a week is excessive and disproportionate.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Relocating the Templeogue Bus gate as suggested has not been responded to by NTA
- No new issues raised.

252. Simon Harris and Marie Redmond (Woodview Cottages)

- Concern to the proposed construction compound in the green area between Dodder View Road and Woodview Cottages.
- Concerns in relation to:
 - Wildlife - damage to biodiversity (risk of contaminants)
 - Query whether an environmental survey has been completed
 - Road Safety
 - Loss of green space for residents, especially for children.
 - Loss of public amenity impacting upon community.
 - Health and Safety
 - Impact upon residents (dust, traffic, nighttime lighting)
 - Flood impact
 - Effect upon current infrastructure – destruction of the Dodder greenway project.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No new issues raised.
- 253. Saint Judes GAA Club (Templeogue)**
 - Recognise the positive environmental objectives of the project.
 - Concern that a cross city link for buses is not assessed or clear.
 - Concern of access to the club, particularly as a result of changes to Spawell roundabout.
 - Concern of failure to examine alternatives, such as continuation of Metrolink from Stephens Green and park and ride at Spawell.
 - Concern that the proposal has ability to supply the forecasted demand for public transport in southwest Dublin.
 - Concern of increased journey times and distances.
 - Concern for impact upon residents and people who rely upon private transport to move around.
 - Concern that buses alone will not fix the transportation needs or capacity required.
 - There is a need for a more transparent study which explores the continuation of Metrolink.
- 254. Saint Louis High School (Charleville Road)**
 - Concern of restructuring of access routes around Rathmines having a profound impact on local institutions, incl. Saint Louis.
 - Concern of access for patrons of the Church of Mary Immaculate Refuge of Sinners Rathmines.
 - Concern that lack of direct travel infrastructure to Rathmines will impede workers who access Rathmines from the north city.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Concern of loss of bus routes and frequency of the No. 18/A, 18 and 15.
- Concern of shortfall of bus service to Rathmines.
- No new issues raised.

255. Stephanie Frame (Highfield Road)

- Concern of traffic congestion and spill over, in particularly to Highfield Road.
- Concern of noise impact upon residents.
- Concern to safety of cyclists.
- Concern of loss of front gardens.
- Concern of loss of mature trees.
- Query whether a light rail system would be preferable.
- **Request an OH**

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Object to the proposed new right hand turn on Upper Rathmines Road onto Highfield Road
- No new issues raised.

256. Stephen Bailey (Rathgar Road)

- Supports the submission made by Rathgar Residents Association (RRA).
- Full submission submitted as summarised above at submission no. 217 of this report.
- **Requests an OH**

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Concern of loss of bus stops in particular bus stop on Rathgar Road at Garville Ave Junction.
- Concern of removal of turns in Ranelagh / turn bans.
- Concern of bus gate in Rathmines and its impact upon Ranelagh residents.
- Concern of shortfall of bus service to Rathmines.
- Concern no OH was held.
- No new issues raised.

257. Stephen Garland (Greenmount Road, Terenure)

- Query the need and justification for the project.

- Concern of reduced cross service bus routes and reduced geographical spread of bus routes.
- Concern of reduced bus service on Haroldscross Road.
- Concern of additional traffic on Terenure Road West.
- A light rail / luas would be a better transport solution.
- Concern of lack of public consultation.
- While car congestion is a problem road widening and tree felling is not the solution.
- Citizens and tourists with special needs and have a physical disability should have full priority in relation to no tariffs and have disabled car parking available in the city.
- Concern with respect to pedestrian crossings and right and left-hand turns.
- Concern of loss of historic built heritage, impact upon ecology & biodiversity and loss of mature trees.

258. Stephen Woulfe (Victoria Road)

- Concern of inaccurate and misleading information.
- Concern of flawed modeling approach.
- Concern of lack of coherence to long term strategic objectives of the state.
- Concern of failing regarding delivery on the key concept of public good.
- Concern of poor and unfair public consultation process.
- Concerned that the fundamental flaws of the current transport system, i.e. bottlenecks has not been addressed.
- Concern alternatives have not been considered.
- Concern local travel routes and needs are not understood.
- Concern of reduced access to services, schools and activities for children.
- Concern of destruction of urban villages.
- Concern of negative environmental impact.
- Concern of restricting local movements and accessibility to shops amenities and public spaces.
- Concern of inaccurate and misleading information provided.
- Concerned accumulative impact, in association with other Busconnects projects, has not been assessed.
- Concern that the fundamental premise of the project is flawed and outdated.
- Concerning the proposal does not serve those people impacted most, given the material reduction in the number of stops, increased distances from people's homes to those stops, thereby reducing the usability of the service.

- Concern of justification off the project and cost benefit analysis.
- Concern of destruction of historic Dublin villages.
- Concern of impact to communities, businesses and individuals.
- Concern the project is not keeping with the '15 minute city' adopted by Dublin City Council.
- Concern the project is contrary to Project Ireland 2040, the Transport Strategy for the Greater Dublin area 2016 to 2035 and to the Climate Action Plan 2023.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Request for an OH to be held.
- Inadequate response submitted by the NTA – fails to address the specific concerns raised.
- Failure to understand the implications of the project on the day-to-day lives of residents.
- Failure regarding delivering on the key concept of 'public good'.
- No new issues raised.

259. Stonepark Investments LTD (Grange Road Rathfarnham)

- Submit that the existing bus stop on Terenure Road East is a health and safety issue for access and egress into Earls Court, No. 80 Terenure Road East. Request that the bus stop be relocated.
- Concerns that the proposal will create a traffic hazard and negatively impact upon the residents of Earls Court to enter and exit the property.
- Concern of loss of car parking
- Concern of devaluation of property
- Concern of loss of residential amenity.
- Concern that the entrance does not meet the required NRA design safety standards.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No new issues raised.

260. Susan Coleman and Declan O'Neill (Rathgar Park)

- Concern the scheme is no longer fit for purpose.
- Concern the scheme is flawed in design.
- Concern of disproportionate inconvenience to achieving final objectives.
- Welcome the NTA's commitment to improving infrastructure and providing a safer, greener, environment for all road users.
- Concern of traffic displacement and failure by the NTA to address where traffic will go.
- Concern of restricted access, delivery and emergency access and most particularly child safety.
- Concern of creation of lengthy circuitous routes to access homes and local villages.
- Concern of increasing emissions.
- Concern of cost benefit analysis proving the projects value.
- Concern of lack of consideration of alternatives.
- Concern of sufficient capacity and frequency of buses on the proposed project and an assessment of same.
- Concern of lack of engagement and consultation with the public.
- Concern for justification of the project.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- The NTA's response does not justify the need to widen TRE/ Rathgar Road or to fell trees.
- The use of the bus light on TRE has made a significance difference and was not in use when NTA, planned the proposed scheme.
- No new issues raised.

261. Susan Kearney, Mary Duff & Iona Whelan (Woodview Cottages)

- Concern to the proposed construction compound in the green area used by Woodview Cottages.
 - Flood impact
 - Health and Safety (dust, traffic hazard, noise)
 - Impact upon residents
 - Wildlife - damage to biodiversity (risk of contaminants)
 - Query whether an environmental survey has been completed.

- Loss of green space for residents, especially for children.
- Road Safety

262. Susan McNamara (Rathfarnham)

- Concern of the compulsory purchase order application for lands attached and adjacent to Rathfarnham Castle.
- Concern insufficient weight has been attached to the importance of the woodland's ecology and local amenity.
- Concern at the proposed loss of the recently renovated unique natural playground for children.
- Concern for the need for another cycle path on Grange road.
- Concerns sufficient attention has not been paid to the possibility of directing a dedicated cycle route through Castleside Drive and Rathfarnham Wood to rejoin Loretto Ave. / Grange road at this point.
- Consideration should be given to moving the bus stop closer to the point where it splits into two lanes where it joins Loretto Ave.
- There are other available spaces locally to provide for improved infrastructure that won't impact the mature woodland at the heart of the CPO application.
- Concern of impact on local people, mature trees, wildlife and children.

263. Tara Delaney (Fairfield Park)

- Concern of the vibrancy, accessibility of Rathgar village.
- Concern that the proposal is contrary to living city needs and local businesses living close to the city centre.
- Concern of traffic rerouting and traffic congestion and impact upon surrounding road, in particular Highfield Road.
- Concern that significant increase in traffic on Highfield Road would make it too dangerous for cyclists.

264. Templeogue Wood Residents Association

- Welcomes the project.
- Concern of closing off access along well established historic main roads.
- Concern Bus gates will close off access to parts of the city from 6:00 AM to 8:00 PM over 14 hours and at Rathmines Bridge, no access onwards at any time.
- Concern of diverting traffic along routes which will involve substantial increase in distances travelled as well as increasing congestion.

- Concern of isolating many districts from easy access to other areas due to widespread imposition of no entry regulations, no right turn / no left turn, no through road across the city.
- Concern of the construction timeframe of the project.
- Concern of serious traffic congestion and damage to the environment.
- Concern of the cost.
- Recommend should the application be granted that a range of conditions be imposed:
 - maintaining access to the major well-established roads.
 - restricting the hours of operation of bus gates to peak travel times example 6:00 AM to 10:00 AM and 4:00 PM to 7:00 PM
 - investigate the wider use of new technology to facilitate bus priority without the need for bus gates / road closure.
 - investigate the use of congestion charges for certain parts of the city particularly during peak travel times.
 - limit the level of construction, limit land take and limit removal of trees.
 - independent consultant review of the entire Busconnects plan.
 - undertake a study for the extension of the metro to southwest Dublin.
- Concern the communitive impact has not been assessed.
- Concern of impact on elderly.
- Concern of severe impact on private transport to move about the city.
- Concerned that cost benefit analysis has not been carried out to date.
- Concern of the level of opposition to the proposal.
- Concern of use of out of date estimates of population density and ignoring opinions of citizens and their public representatives.
- Concern that the project is short term.
- Concern that legal challenges to land acquisition will make the timeframe for construction and completion probably closer to 10 years.
- Concern of impact on built heritage, residential communities and urban villages.
- Concern of the impact on residents of Templeogue, who are essentially being denied access to Lower Kimmage Road.
- Concerned that the plans for each corridor do not consider the implications for developments / communities in adjoining or proximity corridors.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Failure of the NTA's response to address issues raised.
- Concern no OH held.
- No new issues raised.

265. Terenure and Templeogue Sustainable Community Association

- **Requests an OH**
- Transport Analysis & Advocacy Limited has been instructed by its clients Terenure and Templeogue Sustainable Community Association CLG to make the observation on its behalf.
- Professor Austin Smyth has 40 years' experience in transport consultancy and research worldwide. He has acted as lead economist / project manager in securing in the region of 2000 million investment in transport infrastructure in the UK and the Republic of Ireland and internationally.
- Concern for Bus gate on Templeogue Road.
- Concern for Bus gate on Rathmines Road Lower.
- Concern of rat running and traffic spill over / displacement to surrounding residential streets, safety risk to young and elderly.
- Concern of quality of access to facilities, esp. for mobility impaired.
- Concern of potential for redistribution of private vehicle traffic and freight vehicular traffic.
- Query a review of the evidence presented by the NTA for projected increase in AM peak hour trips by Bus travel solely attributable to the CBC Infrastructure bus priority measures.
- Query the projections for an increase in cycling and walking.
- Query the robustness of the transport models employed to generate forecasts and the validation and reliability of model parameters.
- Concern that capacity to cater for bus users will be provided.
- Concern of reduction in the hourly frequency of buses on Templeogue Road, post introduction of the proposed Busconnects scheme.
- Concern data input to the modelling has regard to changes in travel demand, new technology advances and increases in working from home, online shopping and other activities.
- Concern the assessment of the MCA concerning route options may not be robust and alternatives such as 'hurry lights', could provide an improved net outcome.
- Concerns over uncertainty of travel demand for buses and cycling.
- Need for an in-depth review of validation performance of models, as well as application of realism testing and sensitivity testing.

- Concern of an absence of validated behavioural models capable of generating robust estimates of demand.
- Concern of traffic redistribution.
- A projected increase of 73% in total am inbound peak hour travel and 71% pm outbound seems entirely out of line with what could reasonably be expected or supported by verifiable evidence from similar schemes.
- Concern the business case published for the Busconnects project incorporates for the city area as a whole.
- Request the project is paused pending independent review.
- Comprehensive review to be taken of key elements of the ERM and LAM models in conjunction with corridor micro-stimulation models and junction models.
- Comprehensive review of alternatives, of travel behaviour, of timeliness of and coverage of data inputs, a robust cycle trip forecasting tool and updated and independent review of preliminary business case.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Failure of the NTA's response to address issues raised.
- Continued concern regarding data modelling, robustness of analysis and errors in the information submitted.
- Inadequate studies have been undertaken to inform design and assessment of the proposed scheme.
- Concern no OH held.
- No new issues raised.

266. Terenure College Rugby Club

- Concern of threat to children's safety.
- Welcome the provision of Busconnects, however, note practical consideration that some people need to use private vehicles.
- Concern of reduced bus service on Templeogue Road.
- Concern of impact of the busgate on Templeogue Road.
- Concern of right-hand turn bans from Fortfield Road and consequent impact to access to Terenure College Rugby Football Club.
- Concern of traffic displacement and congestion, especially on Fortfield Road & Greenlea Road.
- Concern of limited traffic modelling.

- Concern of inconvenience to local people.
- Concern of reduced access to M50, services and local amenities.
- Concern of lack of enforcement in terms of managing traffic flow and safety issues.
- Concern of impact upon Laverna Grove and Terenure Road West.
- Concern of removal of trees from TRE.
- Concern of impact to businesses in Terenure and 10 minute neighbourhood concept.
- Concern of impact to elderly and their access to services and local amenities such as Bushy Park.
- Concern bus stop 1159 at Terenure College, Templeogue Road is to be moved to a location which floods.
- Concern of removal of slip road from Templeogue Road into Springfield Avenue.
- Concern of CPO of parkland fronting Bushy Park and Rathdown Avenue along the Templeogue Road.
- Concern of impact of the busgate on Rathmines Road and duration of restrictions.
- Concern of Rathgar Road being one way only.
- Concern a consistent direction of traffic flow is not maintained throughout the corridor.
- Support the submission by Terenure West Residents Association and Orwell Park.

267. Terenure Residents Association

- Concern of loss of amenity.
- Concern of restriction of access.
- Concern of reduced commercial activity.
- Concern of damage to heritage and streetscapes.
- Concern of traffic redirection due to bus gates and other restrictions.
- Concern of scale of destruction and environmental impacts.
- Concern of limited short term benefits.
- Concern of lack of cumulative impact of bus connects schemes.
- Concern of lack of consideration of commercial transport journeys.
- Concern of proportionality.
- Concern of lack of consideration of alternatives.
- Concern of breach of Part M Building Regulations affecting the west side of Rathfarnham Road.
- Contravention of Dublin City Development Plan.

- Concern no Park and Ride facilities provided.
- Concern of Bus Gate time restrictions esp. Templeogue Road Bus Gate.
- Concern of right hand turn bans into Rathdown Avenue and Rathdown Park from Templeogue Road.
- Concern of reduction of footpath outside the PO / Centra on TRN.

268. Terenure Road East (TRE) Residents Group

- This submission reiterates the submission by Peter Thornton and Helen Callanan (TRE, Rathgar) summarised above at submission 206 of this report.
- **Requests an OH**

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Note the submission by Rathgar Residents Association
- Concern no OH held.
- The NTA's response does not justify the need to widen TRE/ Rathgar Road by way of CPO or to fell trees.
- The use of the bus light on TRE has made a significance difference and was not in use when NTA, planned the proposed scheme.
- No new issues raised.

269. Terenure West Residents Association

- Concern of traffic hazard to school children in the area.
- Welcome BusConnects in general but have concerns of negative traffic spin of diverted traffic to the surrounding area.
- Concern of closure of Templeogue Road by a bus gate from 6 am to 8 pm seven days a week.
- Concern of unreasonable hours of operation of Bus gate.
- Concern that survey work and justification is current and valid.
- Concern of the number of right turn bans from Rathfarnham Road into Terenure Road East.
- Submit that there is an overwhelming case for a bus priority light in lieu of the bus gate at Templeogue Road, just past its junction with Lakelands.
- Concern of downgrading of bus services on Templeogue Road.
- Concern of poor directional signage for traffic.
- Concern of diverted traffic to Fortfield Road.

- Concern of the imposition of 24/7 turn bans from Fortfield Road onto both Greenlea Road and Lavarna Grove.
- Concern that consultation with residents has not been carried out.
- Concern of access to residents, amenities, parks, schools, churches, services will be negatively impacted.
- Concern that many motorists may disobey the right-hand turn bans and give rise to traffic hazard.
- Concern of unsafe car parking.
- Concern of alteration of traffic flow on Terenure Road West.
- Concern of loss of mature trees.
- Concern of bus stop moves.
- Concern of the CPO of parkland fronting Bushy Park and Rathdown Avenue along the Templeogue Road.
- Concern that a consistent direction of flow along alternative sections of the route cannot be consistent.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Note the submission by Terenure Templeogue Sustainable Community Association CLG & Professor Austin Smyth.
- Inadequate response by the NTA to issues raised re traffic distribution.
- Strongly of the view that the Templeogue Bus gate should be omitted.
- No new issues raised.

270. Teresa and Vincent Lambe (Brighton Road)

- Concern that the consultation process lacks fairness and openness.
- Concern of lack of consultation with local Councils conservation authorities.
- Concern of lack of proper communication with residents who will be affected.
- Concern of impact upon historic heritage villages and communities of Rathgar, Terenure, Rathmines, Kimmage and Templeogue.

271. Tesco Ireland Limited

- Welcome the proposed investment in public transport.
- Busconnects Scheme will greatly improve the way in which Dublin City functions from an economic, social and environmental perspective.

- Welcome the inclusion of the loading bays adjacent to the Camden Street and Aungier Street stores.
- Concern that loading bays will be properly policed and operated.
- Concern that interfaces between the road and bicycle lane along with the materials used are considered in detail.
- Concern that access to the car park of the Tesco retail unit on Terenure Road East is not negatively impacted.

272. The Barber Family (TRE)

- This submission reiterates the submission submitted by Senator Mary Seery Kearney (Templeville Road) summarised above at submission 248 of this report.
- **Requests an OH**

273. The Rathmines Initiative

- Concern of impact upon residents / local people of Rathmines.
- Concern of justification and need for the project.
- Concern of lack of public engagement.
- Concern of lack of clarity of traffic modelling assumptions.
- Concern of redirecting of traffic into residential roads
- Concern of impact upon cyclists and pedestrian safety.
- Concern insufficient urban realm improvements are not included.
- Placemaking should be prioritised over road engineering considerations.
- Recommends that Bus Gate Hours be limited to peak times only.
- Concern of the impact upon Our Lady of Refuge Church in Rathmines.
- Access to Grove Park, Blackberry Lane and Lissenfield be residential access only.
- Concern of impact upon Grove Park.
- Concern of non continuous cycle lanes.
- Need for enforcement of speed limits for buses and e-bikes.

274. The Richview Residents Association (x2 submissions dated 21st June and 25th June 2023)

- Concern of potential impact of the removal of historic boundaries, railings, gates, pavement and street furniture on sensitive historic streets such as Terenure Road East.
- Concern of conflict with the Architectural Heritage Protection Guidelines for

Planning Authorities.

- Concern 169 trees are to be removed.
- Concern with location of a Bus Gate at Rathmines Road Lower
- Concern that the proposal provides no detailed analysis of the likely knock-on effects on traffic flows in the surrounding residential areas.
- Concern of the consequences of the proposed corridor - in particular, the proposed Bus Gate on Rathmines Road Lower.
- Concern of access to Rathmines Church (Church of Mary Immaculate, Refuge of Sinners), especially for funerals and weddings.
- Concern of lack of car parking on Rathmines Road during off peak times.
- Concern and query the restriction on a number of right hand turns.
- Query the need and justification for the project.
- Consultation was conducted over a relatively short period and during a time that coincided with a Covid-19 lockdown. This is contrary to the Aarhus Convention.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No new issues raised.

275. Thomas Michael Larkin

- Traffic safety concern especially for school children at St. Mary's R.C. school in Rathmines.
- Concern of impact to R.C. Church of Mary Immaculate Refuge of sinners.
- Concern of impact to commerce and enterprise.
- Query the need for the scheme.

276. Thomas Sexton (9 Rathfarnham Wood)

- This submission is the same as the submission, by Mary O'Mahony, summarised above at No. 167 – relates to No. 9 Rathfarnham Wood
- Object to CPO of 9 Rathfarnham Wood Plot List 1017(1).1(d), 1017(2) 2d
- Object to CPO of Woodland area of Rathfarnham Castle Park Plot list 1001(1).1f; 1001(2).2f.

- Concern of impact to rear garden, lands sought to be acquired is 1.6m and the lands sought temporarily is 3m
- Loss of beech tree in rear garden
- Agree and support all of the grounds of the Rathfarnham Wood Residents Association (RWRA) submission.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- Concern lands on the opposite side of Grange Road to Rathfarnham Castle Park were not considered.
- Importance of the Park is not appreciated
- No new issues raised.

277. TII

- No specific submissions to make in relation to the proposed road development of the Templeogue / Rathfarnham to city centre Core Bus Corridor Scheme.

278. Tom Kelly (TRE)

- Concern as a property owner who is affected by CPO
- Concern of:
 - The requirement to purchase the specified land has not been properly demonstrated.
 - The consultation process has not given residents adequate opportunity for engagement.
 - The design of the Bus Corridor Scheme will negatively impact not just the immediate vicinity of the corridor, but a far wider zone.
 - The scheme would result in irreparable damage to the heritage of the local area, and to the local community.
 - The scheme would severely impact the quality of life for local residents.
- The proposed scheme has not taken into account changing work & travel patterns resulting from the Covid-19 pandemic.
- The proposed scheme has not adequately taken into account alternative forms of transport.

- No attempt has been made to properly sequence improvements to the bus corridor.
- The scheme is short-sighted and not remotely future-proofed.
- The sites proposed for CPO on Terenure Road East do not seem to be required in the context of the NTA's Signal Controlled Priority Plans.
- Concern of loss of trees and built heritage.
- Concern of impact upon the community and businesses and trade.
- The scheme would severely impact the quality of life for residents of affected properties, and considerable destruction to property value.
- Concern of loss of two beautiful trees on private property which act as noise barrier.
- Concern of proximity of carriageway 20m closer to bedroom window of 2 Townhouses, TRE, D6.

279. Una Lyons (Highfield Road)

- Concern of built and historic heritage of the city.
- Concern of lack of capacity and impact of traffic to Highfield Road.
- Concern for cyclists using Highfield Road.
- Traffic alterations from Upper Rathmines Road to Highfield Road will significantly increase volumes of outbound traffic onto the outbound lane on Highfield Road onto Rathgar Road.
- Concern of Traffic congestion and backlogs.
- Concern of delays of accessing the Christchurch Rathgar car park.

280. Una O'Neill (Templeogue)

- Concern of traffic congestion, volume and gridlock.
- Health and safety concerns as a result of traffic hazard.
- Concern of access for emergency vehicles.
- Concern of loss of access to services and amenities for community and locals.
- Concern of connectivity to of the CBC with College Green and Dame Street.
- Query the justification for the scheme.
- Concern adequate consideration of alternatives not considered.

281. Ursula Budd & Michael McArdle (Rathgar Ave)

- Concern of impact upon built heritage and historic villages, in particular Rathgar Village.
- Query justification, traffic modelling and survey accuracy for the proposal.

- Support improvements to pedestrian facilities, bicycle lanes and public transport network but not at a cost to environment, heritage and community.
- Concern of loss of mature trees.
- Concern of increased traffic flow and parking issues.
- Concern of pushing traffic onto surrounding residential streets, in particular Highfield Road.
- Concern that as a short-term solution Busconnects will destroy Georgian and Victorian Dublin.
- Alternative measures such as congestion charges, comprehensive Park and Ride facilities, contactless payment, priority bus light and introduction of school buses have not been explored.
- Proposed measures should be trailed before planning is granted.
- Concern that traffic modelling for the entire Busconnects project is performed.
- Concern that the EIA is fundamentally flawed.
- Concern that Harold's Cross Road (a major traffic route) was excluded at the earliest stages of the Busconnects project and not properly assessed as a possible route.
- Concern of threat to heritage, trees and wildlife
- Concern of emissions and noise impacts.
- Concern of loss of access for local residents to amenities and services.
- Concern of reduction in width of footpaths, one way traffic, right / left turn bans and the impact on businesses in Rathgar during construction phase.
- Concern of safety for pedestrians and cyclists.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- The NTA's response does not address concerns raised.
- The NTA have commenced a new bus service, Busconnects Orbital S4 route, along Highfield Road in Rathgar which is already having an impact of clogging the system on Rathgar.
- Again concern bus traffic is being funnelled through Rathgar and Rathmines, rather than down through Harolds Cross, which is an area seeing significant residential / population growth.
- No new issues raised.

282. Wainsfort and College Residents Association

- Concern of impact of the proposed bus gate on Templeogue Road and its proposed time of operation.
- Concern that the proposed bus gate and ban on right-hand turns in our area will add many kilometres to car trips.
- Concern of impact to elderly and disabled.
- Concern of access to Bushy Park and local amenities, services and facilities.
- Concern of justification and need for the project.
- Concern of impact upon local traffic.
- Concern of lack of cumulative impact assessment with adjoining Busconnects schemes, such as Kimmage Bus Corridor.
- Concern of lack of clarity in relation to where the bus corridor goes after it reaches Georges Street.
- Concern of flawed and lacking public consultation process.

283. WORK Residents Association

- Represent Willington, Wilderwood, Osprey, Rushbrook and Kennington area of south – west Dublin.
- Support the delivery of an efficient, low carbon and climate resilient public transport service.
- Question the contribution CBC can make to meeting the travel needs of commuters.
- Query the need and justification of the scheme.
- Minimal reduction in the time of the average bus journey to the city centre
- The mismatch between demand and supply is not addressed in the application.
- There is a need for Metro.
- Concern that the impact of all three CBC in southwest Dublin area have not been cumulatively assessed.
- Concern of impact of right / left turn bans and proposed bus gate (6am – 8 pm) at Olney Crescent on approach to Terenure Place together with the bus priority signalling in Terenure Village.
- Query the necessity of bus gate restrictions for 14 hours a day 7 days a week.
- Concern of impact to businesses, particularly in Terenure Village, on many trades people and workers who rely on private car / vans.
- Concern of access for residents to local amenities, community facilities, services, Bushy Park.
- Concern of car and bus traffic congestion and chaos.

- Concern of how the proposed scheme ties into the existing road network on Dame Street.
- Welcome dedicated cycle tracks and cycle lanes.
- Welcome measures to improve public realm along the scheme.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- No new issues raised.

284. Ashfield Place Owners Management CLG

- Part of the common area of Ashfield Place is affected by the CPO – section 1d: Cypress Grove Junction to Templeville Road, 1110(1).1d (permanent) and 1110(2).2(d) (temporary)
- Concern that there is no provision for a yellow box at the entrance to the estate.
- Concern cycle path proposed is not continuous and a shared space.
- Request that speed cameras are installed to enforce the 30 Kph speed limit, through Templeogue Village.
- Oppose the installation of speed humps due to noise pollution.
- Concern over alteration to the playground and amenity space. Survey requested of attenuation tank under the playground and commitment to reinstatement of impacted trees and compliance with safety requirements and planning approval.

South Dublin County Council.

Response to NTAs Comments on submission

The third parties responded to the NTAs comments in relation to the proposed scheme as follows:

- South Dublin County Council would welcome a condition that, should approval be granted, the NTA and their design consultants ensure that communication channels are maintained with SDCC.

- The SDCC traffic section are satisfied with the responses to all items raised for the first section from the existing Spawell junction to Fortfield Road.
- With respect to Nutgrove Avenue to Dodder Park Road Bus Corridor section: SDCC traffic section are satisfied that sufficient junction modelling analysis has been completed to demonstrate that the proposed changes will still work within acceptable junction capacity limits.
- SDCC traffic section are satisfied that the NTA have demonstrated that the proposed scheme will seamlessly tie into the Dodder Greenway project.
- With respect to construction compound TR3 at Woodview Cottage Green - SDCC are generally satisfied with the compound location save for the suggested additional screening around the compound to minimise the visual impact on the adjacent green amenity.
- With respect to land management - SDCC are satisfied that close liaison on land matters will continue with the NTA and their agents until the completion of the scheme and handover of the public realm areas to SDCC.
- With respect to construction traffic management - SDCC are satisfied that the NTA have addressed our comments in relation to this item.
- SDCC Public Realm Section have employed the services of an Arborist to investigate their concerns of the impacts of the Templeogue Rathfarnham to City Centre Core Bus Corridor Scheme on the existing trees within 'Rathfarnham Castle Park'. SDCC have attached a copy of this Arborist's report with this submission. SDCC ask that this report is carefully considered and if practical, any recommendations implemented.
- It is noted in the NTA response to the original submissions that "There will be provision of substantial new tree planting within the castle demesne to consolidate the new edge to the woodland group and ensure the amenity of the open space is restored. There will also be substantial replacement and additional street tree planting throughout this section, including medians, footpaths and roadside spaces"

- In the original SDCC submission, the Council's Architectural Conservation Officer provided a very detailed report in relation to this specific item and provided feedback and comments throughout the consultation stage.
- The design for the reinstated boundary wall is considered an improvement allowing better consistency within the ACA and a boundary treatment that reflects the original type, all of which had been discussed and agreed with the undersigned, OPW, DHLGH and Conservation Architect consultants for the NTA.
- SDCC Economic Development Section acknowledges the detailed response by the NTA are satisfied with the response and have nothing further to raise at this moment in time.
- SDCC Active Travel Section are satisfied with the response and have nothing further to raise at this moment in time.
- SDCC Roads Maintenance Section have nothing further to raise at this moment in time.
- SDCC Water and Environment Section:
 - During construction the developer must ensure the protection of the existing live storm, foul and watermain pipes and services.
 - Non new issues raised
- SDCC submit that the NTA have satisfactorily addressed the vast majority of the issues raised in the SDCC original submission dated August 2023.
- SDCC have highlighted a few items that are of particular importance, namely the potential mature tree loss at Rathfarnham Castle and have attached a recent arborist report that recommends some further mitigation measures to address these concerns. We highlight the importance of the facilitation of commuter travel during the works, the protection of existing live services and the satisfactory reinstatement of public realm areas. In particular, perhaps additional screening around the proposed compound to minimise the visual impact at the adjacent green amenity and some gesture to improve the remaining green amenity area to offset the loss of some of it for the period of construction.

- In general, SDCC are fully supportive of this sustainable movement Core Bus Corridor in our County. This proposed scheme aligns with national, regional and our SDCC policy objectives on supporting sustainable movement and reaching our climate action targets. SDCC are committed to assist the NTA and their agents in delivering the proposed scheme in the South Dublin administrative area.
- Arborist Report, 22nd March 2024.
 - The report concurs with SDCC that there is a high probability that the impact from the proposed works will be higher than that indicated and that more trees will need to be removed to facilitate the proposed works than shown and that the visual impact on the area will be greater when one considers all the understory and smaller trees that will be removed to facilitate the proposed works.
 - There are uncertainties within the scheme and while the approach put forward to construct the scheme is acceptable in principle, it is likely that the impact on the tree vegetation will be greater than shown and in some instances, the retention of trees shown to be retained at this stage will not be feasible at construction stage.
 - The report concludes in order to assess the full implications of the proposed works on the woodland block within 'Rathfarnham Castle Park', the tree survey needs to be reviewed to include all trees within influence, the topographical survey needs updating to ensure trees are accurately positioned and the arboricultural impact assessment needs to have a realistic review of the proposed works on the trees to be retained, including the review of all levels,
 - Service proposals and whether proposals such as No-Dig methodologies are workable mitigation measures.

