Inspector's Report

ABP-314610-22

Development	BusConnects Ballymun/Finglas to City Centre Core Bus Corridor Scheme
Location	Ballymun/Finglas to Dublin City Centre
Planning Authority	Dublin City Council & Fingal County 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 I
Prescribed Bodies	Refer to Appendix II
Date of Site Inspection	26th January, 4&5th September, 25 & 26th October & 19th November 2023
Inspector	Sarah Lynch

Contents

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 11km and will be comprised of two main alignments, from Ballymun to the City Centre (the Ballymun Section) and from Finglas to Phibsborough (the Finglas Section).

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 314642-22. 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. Four Consultation Meetings were held on 21st April, 2021, 20th May, 2021, 10th June, 2021, and 29th June, 2021. A determination in relation to whether the project is

strategic infrastructure or not is not required under this Act. The pre application discussions were closed on the 12th August 2021.

1.4. 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 12th May 2023.

2.0 Site Location and Description

2.1. The start of the scheme at Arran Quay commences at the junction with the R148 and Father Matthew Bridge, the carriageway at this location is flanked by 3-5 storey buildings and is wide accommodating 4 traffic/bus lanes and separate cycle lanes. As the Road progresses north, it narrows to two traffic lanes and cycle lanes, flanked by the public records office to the east and development lands to the west. The road widens after the junction with Chancery Street and narrows again at Church street due to the presence of a two story terrace after which it widens again and is flanked by a mix of developments on the approach to the junction with Kings Street North.

2.2. North of this junction the road widens to a dual carriageway with central reservation and advisory cycle lanes and proceeds northwards in this arrangement to just north of the junction with Catherine North Lane whereby it narrows again and proceeds towards Constitutional Hill and the junction with the Western Way. Cyclists are diverted along the Western Way and onto the Royal Canal Bank which is a narrow back street bounded by mews and terrace properties and a green area and walkway for its entire length.

2.3. For the vehicle route beyond the junction with the Western Way the road is narrow and accommodates three lanes of traffic and is restricted by a stone wall and further on residential buildings. The road continues in this arrangement with the uses on either side changing between residential and commercial on ground floor as the route proceeds into Phibsborough crossroads.

2.4. The vehicle route slightly widens north of the Phibsborough Shopping centre with a fourth traffic lane available. The use remains predominantly residential interspersed by commercial properties.

2.5. The quiet street treatment for cyclists crosses the North Circular Road and continues along the Royal Canal Bank until it rejoins the vehicle route at the junction with the R108 and Eglington Terrace.

2.6. A contra flow cycle path is provided on the eastern side of the R108 (Prospect Road) and continues to the junction with Prospect Way at Harts Corner. The route at this junction separates into two routes, the first continuing to Ballymun and the other to Finglas.

Ballymun Route

2.7. The Ballymun Route continues along Botanic Road and is flanked on both sides by terrace dwellings. At the junction with Botanic Road and the R108 the route continues along Mobhi Road (R108) with street upgrades proposed along Botanic Road.

2.8. North of the Junction with Botanic Avenue the road widens and a segregated cycleway is present to the west of the road separated from the carriageway by a grass treelined verge. A cycle lane is proposed along Mobhi Drive along the banks of the Tolka which his bounded by dwellings to the north and the river to the south, and the vehicular route along with the proposed cycle and bus infrastructure continues along St. Mobhi Road which his flanked by dwellings on both sides and Scoil Mobhí and its attendant grounds.

2.9. The route continues to the junction with Griffith Avenue whereby it ties into upgrades along Griffith Avenue and continues along the triangle of Griffith Avenue, Ballymun Road and St. Mobhi Road which merge at the northern end of the triangular arrangement into a dual carriage way type route with a grassed central reservation. This element of the route is bounded by Albert College Park and DCU to the east and dwellings to the west. This road layout continues with three vehicle lanes northwards and is bounded by predominantly residential development, interspersed with small neighbourhood shopping parades and educational buildings into Ballymun whereby the scheme ends.

Finglas Route

2.10. The Finglas Route as mentioned above commences when the route branches into two separate routes at the junction with Prospect Way at Harts Corner. This element of the route is contains three vehicle lanes and advisory cycle lanes and is flanked by residential development, educational facilities and Glasnevin Cemetery. The road

widens from north of the Glasnevin Cemetery entrance and accommodates four lanes with advisory cycle lanes on the inbound side of the carriageway and a segregated cycle lane on the outbound. The road also widens to include a planted central reservation. For a considerable length, residential development is set back from the road and in many sections separated from the road by a 2 metre wall.

2.11. North of the junction with the Tolka Valley Road the road widens and provides a mix of on carriage way cycle lanes and segregated cycle lanes through Finglas. Along this section of the road residential development is of a higher density with many apartment complexes. Northwards of Church Street the development is set further back and largely out of sight from the route and proceeds in this manner along the Finglas bypass to the end point of the scheme at the roundabout junction with St. Margarets Road.

3.0 **Proposed Development**

3.1. The Proposed Scheme will be approximately 11km in length and will be comprised of two main alignments in terms of the route it will follow, from Ballymun to the City Centre (the Ballymun Section) and from Finglas to Phibsborough (the Finglas Section). The Ballymun Section of the Proposed Scheme will commence on R108 Ballymun Road at its junction with St. Margaret's Road, just south of M50 Motorway Junction 4, and will be routed along the R108 on Ballymun Road, St. Mobhi Road, Botanic Road, Prospect Road, Phibsborough Road, Constitution Hill and R132 Church Street as far as R148 Arran Quay at the River Liffey on the western edge of Dublin City Centre. Priority for buses will be provided along the entire route, consisting primarily of dedicated bus lanes in both directions, where feasible, with alternative measures proposed at particularly constrained locations such as at R108 St. Mobhi Road.

3.2. A complementary cycle route along quiet streets is proposed along Royal Canal Bank in Phibsborough, which will extend southwards from the Royal Canal to Western Way, parallel a short distance to the east of R108 Phibsborough Road, and also through the Markets Area at the southern end of the Proposed Scheme. The Finglas Section of the Proposed Scheme will commence on the R135 Finglas Road at the junction with R104 St. Margaret's Road and will be routed along the R135 Finglas Road as far as

Hart's Corner in Phibsborough, where it will join the Ballymun Section of the Proposed Scheme.

3.3. Priority for buses will be provided along the entire route, consisting of dedicated bus lanes in both directions. Continuous segregated cycle tracks will be provided from the Church Street Junction in Finglas to Hart's Corner. No cycle tracks are proposed along the Finglas Bypass at the northern end of the Proposed Scheme, as more suitable routes are available along local streets.

Key elements of the Scheme:

- The number of pedestrian signal crossings will increase by 26 from 18 to 44 as a result of the Proposed Scheme;
- The proportion of segregated cycle facilities will increase from 60% on the existing corridor to 93% on the Proposed Scheme; and
- The proportion of the route having bus priority measures will increase from 49% on the existing corridor to 100% on the Proposed Scheme.

Specific works proposed within the development include the following:
The Proposed Scheme is described in the following seven sections (Section 1 to Section 4 comprise the Ballymun Section of the Proposed Scheme and Section 5 to Section 7 comprise the Finglas Section of the Proposed Scheme):

- Section 1 – Ballymun Road from St. Margaret's Road to Griffith Avenue;
- Section 2 – St. Mobhi Road and Botanic Road from Griffith Avenue to Hart's Corner;
- Section 3 – Prospect Road, Phibsborough Road from Hart's Corner to Western Way;
- Section 4 - Constitution Hill and Church Street to Arran Quay;
- Section 5 – Finglas Road from St. Margaret's Road to Wellmount Road;
- Section 6 – Finglas Road from Wellmount Road to Ballyboggan Road; and
- Section 7 – Finglas Road from Ballyboggan Road to Hart's Corner.

<u>Section 1</u>

Section 1 of the Proposed Scheme will commence on R108 Ballymun Road at its junction with St. Margaret's Road, just south of M50 Motorway Junction 4. This section of the Proposed Scheme extends along R108 Ballymun Road to the junction with R102 Griffith Avenue.

Priority for buses will be provided along the entire length of this section of the Proposed Scheme, with dedicated bus lanes in both directions. Segregated cycle tracks will be provided in both directions. The Proposed Scheme will also reduce the footprint of the existing 12 wide signal-controlled junctions.

Section 2

Section 2 of the Proposed Scheme will commence at the R108 St. Mobhi Road / R102 Griffith Avenue Junction and will extend for 1.5km to Hart's Corner north of Phibsborough, where it will meet the Finglas Section of the Proposed Scheme.

A northbound Bus Gate will be provided on R108 St. Mobhi Road at the southern arm of the junction with R102 Griffith Avenue to provide appropriate priority for bus services where no bus lane is provided in the northbound direction due to width constraints. Segregated cycling tracks will be provided on each side of the street generally, with a two-way cycle track section proposed on part of the eastern side of R108 St. Mobhi Road to cater for higher flow of pedestrians and cyclists accessing a cluster of schools and sports clubs on that side of the road.

Section 3

Section 3 of the Proposed Scheme will commence at the R108 Prospect Road / Lindsay Grove Junction at the southern apex of Hart's Corner and will extend through Phibsborough over a length of 1.2km to the R135 Western Way Junction. Priority for buses will be provided along the entire length of this section of the Proposed Scheme, with dedicated bus lanes in both directions over most of the length, apart from at three short sections (Prospect Road / Whitworth Road, Phibsborough Road (150m south of Doyle's Corner) and Phibsborough Road (50m north of Western Way) where signal-controlled priority for buses will be used. A two-way segregated cycle track will be provided along the eastern side of R108 Prospect Road to the Royal Canal, where the cycle route will deviate a short distance eastwards to join the Royal Canal Bank, an infilled former canal branch, bypassing Phibsborough Village.

The existing railway bridge on the Connolly railway line to the south of Lindsay Grove will be widened, and two new cycle / pedestrian bridges will be provided:

- One over the Docklands railway line adjacent to Whitworth Road; and

- One over the Royal Canal. Heading southward from the Royal Canal, the cycle route will largely avail of the existing quiet street along Royal Canal Bank.

The cycle route will pass around the eastern side of Phibsborough Library and will then cross underneath R101 North Circular Road, where a new bridge will be provided to enable the north to south cycle route to pass through without the climb and delay of a traffic signal crossing.

Section 4

Section 4 of the Proposed Scheme will commence at the R135 Western Way Junction and will extend along R108 Constitution Hill and R132 Church Street for 1km southwards to the R148 Arran Quay / Ormond Quay Junction at the River Liffey, which will be the end of the Proposed Scheme.

Priority for buses will be provided with dedicated bus lanes over most of this section, with three short gaps where Signal Controlled Priority will be provided instead at the following locations on Church Street Lower:

- Southbound from the junction of R804 King Street North to Mary's Lane for a length of 190m;
- Northbound from the junction at May Lane for a length of 60m; and
- Southbound from the junction at Chancery Street for a length of 50m.

Along R108 Constitution Hill, a two-way cycle track will be provided on the eastern side of the street to connect from R135 Western Way to Coleraine Street.

An additional northbound cycle track will also be provided on the western side to connect to the Technological University Dublin campus at Grangegorman via Broadstone Gate.

The main cycle route will follow quiet streets through the Markets Area from Coleraine Street to R148 Ormond Quay. Along Church Street Lower short sections of cycle track will be provided at the three locations where there will be gaps in the bus lanes.

Section 5

Section 5 of the Proposed Scheme will commence at the northern end at the junction of R135 Finglas Road with R104 St. Margaret's Road and will extend in a south-eastern direction along the Finglas Bypass dual carriageway over a length of 1.1km to the Wellmount Road Junction on the southern edge of Finglas Village.

Priority for buses will be provided along the entire length of this section of the Proposed Scheme, with dedicated bus lanes in both directions.
In the Proposed Scheme, a northbound bus lane will be provided along the full length of this section through conversion of the existing left-hand traffic lane to a bus lane over a length of 0.5km. Bus lanes will also be provided on the southern slip ramps at the Mellowes Road grade-separated junction to cater for proposed bus route F2 that will serve the north-western area of Finglas.

Section 6

Section 6 of the Proposed Scheme will extend along R135 Finglas Road from the Wellmount Road Junction to the Ballyboggan Road Junction, over a length of 1.6km. Priority for buses will be provided along the entire length of this section of the Proposed Scheme, with dedicated bus lanes in both directions. Segregated cycle tracks will be provided in both directions along the full length of this section of the Proposed Scheme.

Section 7

Section 7 of the Proposed Scheme will extend along R135 Finglas Road for a distance of 1.5km to Hart's Corner where it will meet the Ballymun Section of the Proposed Scheme. Priority for buses will be provided along the entire length of this section of the Proposed Scheme, with dedicated bus lanes in both directions. This will require road widening over a length of 330m in front of Glasnevin Cemetery at St. Vincent's School on the western side and at part of Bengal Terrace on the eastern side.
South of Claremont Lawns, alongside Glasnevin Cemetery, the existing on-street parking will be removed and replaced with a new parking facility with the same number of spaces, which will encroach into the open public space at Claremont Lawns. Segregated cycle tracks will be provided in both directions along the full length of this section of the Proposed Scheme.

The Construction Phase for the Proposed Scheme is anticipated to take approximately 24 months to complete. It will be constructed based on individual sectional completions that will individually have shorter durations typically ranging between two to 12 months.

4.0 Submissions

4.1. Prescribed Bodies

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.
- The proposal has been considered in relation to the core strategy of the Dublin City Council Development Plan.
- The Council will not comment on the acceptability of the EIAR.
- Ballymun Local Area Plan – development is in accordance with movement policies contained therein. Attention is drawn to the proposed east west link within this plan, and it is requested that the development does not jeopardise the delivery of this infrastructure.
- Ballymun main street should be treated consistently for its full length.
- There should be adequate parking to serve commercial developments along the main street.
- Tree colonnade should be extended.
- The proposed development will deliver on a number of objectives within the Finglas Strategy 2021.
- 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 development does pass through the Phibsborough conservation 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 signficantly contributing towards climate action.
- Overall strong support for proposed scheme.
- Scheme will remove bicycles from bus lane and therefore improve speed of bus service.
- DCC 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.
- Scheme should seek to maintain existing footpath where possible and seek to improve pedestrian connectivity to bus stops.
- Where cycle lanes move behind bus stops and car parking areas, measures should be put in place to slow cyclist down.
- NTA should undertake a substantial awareness campaign and behavioural change programme.
- Queries in relation to a number of locations such as parking at school inside the bus lane, interaction of all road users at the metro interchange, junction design at Church street, left turn slip of luas lane on Church street to be reviewed, purpose of yellow boxes on bus lane, safety of cycle crossing on Finglas Road.
- A liaison group is recommended between DCC, TII, NTA and construction contractors.
- Changes to parking at commercial units is proposed, adequate set down for deliveries should be provided at these premises and changes to parking and road markings should be agreed with DCC.
- Position of verges should permit drainage from both the footpath and the cycleway.
- Rationale for single and two way lane on Griffith Avenue to be clarified.
- Junction of Prospect way with Botanic Road is overly complicated.
- Bus island at Lindsay Grove is narrow and will result in passengers disembarking onto the cycle way.
- Two-way cycle track merges with footpath at Whitworth Road, this is not acceptable.
- Merging of cycle lanes and bus lanes is considered unnecessary.

- The submission outlines a number of locations whereby cycle lanes make conflict with footpaths.
- All drainage works should be agreed with DCC and clarifications are sought in relation to a number of locations.
- Scheme to ensure protection of receiving waters.

Archaeology

- Scheme passes through the zone of archaeological constraint for recorded monuments DU018-020 Historic City.
- Conditions recommended.

Conservation

- Route runs through the Prospect/De Courcy Square ACA, new bus shelters will impact character of ACA, location appropriate design is required.
- Route also runs along part of St. Canice's Square Conservation Area. Similar issues raise to that above.
- Cumulative impact of additional signage and street furniture should be
- Relevant conservation policies are outlined.
- CPO will affect the railings of the Players Factory RPS 855, care to be taken to ensure works do not affect setting of RPS.
- Setting of Westmoreland Bridge RPS 8807 will be impacted by new bridge which appears overly bulky.
- Works to front of Phibsborough Library RPS 8884 will result in removal of railings.
- Concerns are raised in relation to bus shelters near to Glasnevin Cemetery.
- All protected structures in vicinity of works should be adequately protected.
- Care should be taken in relation to works within or adjacent to other non protected structures and historic landscapes included on the National Inventory of Architectural Heritage such as lands at former Stormanstown House, Church of Our Lady of Victories, Dean Swift Bridge, historic steps at from Broadstone Park to North Circular Road to name a few.
- Impact to Structures on the Dublin City Industrial Heritage Record Survey – sub surface elements of Wad Bridge, Finglas Bridge/Tolka Bridge,
- Adequate protections during construction are required for historic street furniture, cobbles setts, surfaces and lamp posts.

- Where kerb stones are to be removed, they should be integrated into works and protected.
- Where trees are to be removed, they should be replanted.
- Where boundary treatments are to be removed they should be set back and all details of same should be agreed with the DCC Conservation Officer.
- Red tarmac to be replaced with a more appropriate surface in ACA.

City Architect

- Overall support for project.
- Footpaths to be of sufficient width, concerns are raised in relation to Mobhi Road.
- Drawings are not of a sufficient scale to determine proposed public realm improvements.
- Access to NCBI should not be restricted for visually impaired.
- Additional details are required in order to assess impacts to the Phibsborough library – main access route from North Circular Road is to be removed, alterations to this section of the works are proposed.
- Removal of 23 trees along Constitution Hill will remove an effective noise barrier, the replacement with Silver Birch is not acceptable as this species will not provide adequate noise buffering.
- Scheme should consider retention of lime trees at Kings Inn.
- Bus Shelters design should be considered in relation to ACAs and impacts to footpath widths.
- Additional details in relation to materials and street furniture palette is required.
- Drinking water fountains should be included in scheme.
- Query omission of raised tables at some locations.

Constitution Hill Regeneration Project

- This project will deliver 49 homes in 2025 & 76 homes in 2027.
- Construction compound identified by Bus Connects is in the location of a new housing block.
- To facilitate construction of Constitution Hill it has been agreed that all existing residential traffic will access the site via St. Catherine's Lane, the northern entrance will be solely for construction traffic and the location of this compound in this area will cause issues for traffic management.

- The location of this compound should be reconsidered in the context of this redevelopment.

Parks Department

- CAD drawings were requested from NTA by this section and were not provided. Drawings are not of sufficient size to see detail.
- Due to lack of details, it is not possible to comment accurately.
- Details of replacement trees is required.
- Trees indicated for retention will not be retained due to works at and near to roots. A tree bond is recommended.
- Concerns in relation to underpass at Phibsborough Library – under pass will signficantly impact the existing park and will create an area for antisocial behaviour due to lack of surveillance.
- Lack of detail in relation to SUDs.
- Photomontages do not reflect plans in terms of landscaping.

Department of Housing, Local Government and Heritage - DAU

- Impacts to Otter around the new pedestrian bridge and cycle bridge across the Royal Canal downstream of Cross Guns Bridge in Phibsborough, concerns are raised in relation to the movement of otters in this area and the cumulative effect of works together with other infrastructural projects that will be developed at the same time. Facilitating otter movement is essential, it is recommended that a plastic chute with internal corrugations or ladder is placed on the downstream face of the 5th Lock Gate.
- 5 trees to be removed contain features suitable for bat roosts, removal of these trees should be carried out under supervision and a bat box provided in its place.
- Development and works should be carried out in a manner which prevents any deterioration of water quality of adjacent rivers, standard conditions recommended.
- No objections outlined in relation to archaeology, standard conditions recommended.

Inland Fisheries

- Royal Canal supports significant populations of coarse fish.

- Tolka supports Atlantic Salmon, Lamprey and brown trout.
- Adequate protections are required during construction through environmental construction management planning.
- Any dewatering of excavations must be treated by overland infiltration or attenuation area.
- Guidelines on protection of fisheries during construction should be consulted.
- Crossing of canal must include fish passable structures, preferably in clear span design.

4.2. **NTA Response to prescribed Bodies**

4.3. **Response to Dublin City Council**

4.4. There are numerous comments made by DCC within the submission in relation to design elements of the scheme and the NTA has responded to all such comments individually, in the interest of conciseness I will not summarise all such responses and refer the Board to the NTA's response to submissions should the need for further detail be required. The following is a summary of the main responses.

- The NTA acknowledges the comments made by DCC in relation to the policy context of the proposed scheme and the planning history along the route.

<u>Ballymun Parking</u>

- In relation to parking it is stated that, along the Ballymun Road there is a limited amount of existing parking at irregular intervals along the street. Most parking is provided on side streets, or within multi-storey buildings.
- Just south of Santry Cross there are 11 existing parking spaces in 4 pockets indented into the footpaths on each side of the street. The need for these spaces is limited. The removal of these spaces will improve pedestrian facility and remove the conflict with cars and cyclists at this location.
- In the heart of Ballymun town centre there is part-time on-street parking on the eastern side along part of the street. This is a busy location with extensive active frontage, and the parking is intensively used. This is to be retained and an additional separate parking layby will be provided to prevent parking on the bus lane on the western side of the street.

Trees

- In relation to the extension of the tree colonnade the BusConnects proposals for additional street trees are focussed on those parts of the street where there is space available for additional tree planting, elsewhere there is no frontage development yet and it would be premature to implement tree planting at these locations.

Paving

- In relation to paving materials – high quality materials will be used at appropriate locations such as the heart of Ballymun town centre.

Finglas

- Removal of footbridge at Finglas Rd is not required and is on a desire line but is augmented by the provision of an at surface level-controlled crossing for cyclists and pedestrians.

Phibsborough

- Many of the objectives outlined in the Phibsborough Local Environmental Improvement Plan January 2017, are provided for within the scheme and are listed within the NTA response to the submission.
- At Westmoreland Bridge on Phibsborough Road over the Royal Canal the proposed scheme proposes to more than double the existing footpath width on the western side as is clearly shown on the drawings therefore addressing pedestrian facility concerns.
- In relation to Phibsborough Village it is stated that there are limited extents of heritage paving features in parts of the Doyles Corner junction which will be preserved in – situ. High quality paving will be provided over the 400m length of Phibsborough Road from the junction at Connaught Street southwards as far as the junction at Monck Place.
- Landscaping is shown on general arrangement drawings.
- Parking on Ballymun Road South of Our Lady of Victories Primary school is required as there is regular obstruction of the bus lane and cycle lane by cars

parked in the vicinity of the primary schools. The removal of one traffic lane will provide parking and prevent interference with the bus and cycle lanes.

- In relation to Mobhi Road/ Griffith Avenue junction – changes to this junction during COVID were temporary and funded by the NTA. The junction has therefore been redesigned for the purpose of the BusConnects scheme.
- Additional alterations are also proposed to facilitate child cyclists to the nearby school.
- In relation to interchange at Glasnevin with Metro Link it is stated that provision of a bus stop at the future railway/metro station is annotated on the proposed scheme drawing, the location of this stop was coordinated with the Metro link design teams.
- In relation to the reduction of right turning at Church Street, it is stated that this is not heavily used and will therefore not result on queuing which would impact the Luas.
- The removal of the left turning slip at the crossing of the Luas Red Line at Church Street was reviewed with TII who operate the tramway and it was requested that this remain.
- In relation to roundabout at Finglas and St. Margarets Road, liaison with the Luas extension team has occurred and will continue and it is recognised that this roundabout is intended to be replaced at a later date to facilitate the Luas. The design will be amended accordingly when required.
- Purpose of yellow boxes with arrows is stated to protect cyclists - Any permitted bus lane traffic such as public service vehicles which includes taxis and private coaches that wishes to turn left must first move right into the general traffic lane and await the green signal for that lane which will come after the green bus signal has shut down and most cyclists will have cleared the junction in advance of the left-turn traffic movement.
- In relation to safety concerns at the cycle crossing on the Finglas Road after the junction with Prospect Way the NTA has outlined how this junction will function and provides for 2 no. stop lines to protect cyclists. Signalisation of this

junction is also sequenced in a manner that protects cyclists crossing in all directions.

- In relation to pedestrian priority along the scheme it is stated that, overall in the Proposed Scheme for Pedestrian Priority, additional physical interventions are provided throughout the length of the core bus corridor, such as enhanced/additional pedestrian crossings, raised table side entry treatments, and enhanced separate cycling infrastructure.
- Pedestrian crossings will increase from 111 to 137, raised table crossing will increase from 27 to 78.
- In relation to conflicts with cyclists at bus stops, the NTA outlines that cycle lanes are narrowed on approach to the bus stop and the gradient increased as well as the provision of signalised crossings and tactile paving to protect the visually impaired.
- In relation to loading bays it is stated with a few exceptions due to constraints, the existing servicing and loading provisions have been retained. In very restricted places such as in Phibsborough Village it may be necessary to allow loading from within the bus lane for limited off-peak hours instead of designating formal loading bays.
- In relation to the interaction with other major transport schemes the applicant has confirmed that they have consulted extensively with other stakeholders in this regard.
- In response to requests to locate the green area between the cycle lane and footpath it is stated, for most of the 1.5km length of the Finglas Road dual carriageway between Finglas Village and old Finglas Road where there are grass verges along the edges of the road, the proposed cycle track will be located on the road side of the tree-lined verges to provide new separation between cyclists and pedestrians compared to the existing arrangement. This will largely address the shortcomings of the current road layout as noted by DCC. In only one short 150m long northbound section of the proposed scheme is it proposed to locate the cycle track beside the footpath because of an irregularity in the existing road layout where the trees are too close to the carriageway for the cycle track to fit.

- In relation to concerns about bus stops and separation distances, it is stated that narrow island bus stops are only included in the proposed scheme where space is restricted, and mainly for bus stops that will accommodate alighting activity more than boarding on the northbound side of the route. In those locations there would be little or no benefit in full width bus stop islands as waiting by boarding passengers will be minimal.
- In relation to St Mobhi Road, it is stated that a compromise was necessary to enable retention of the mature street trees that are of major significance for the existing high-quality visual character of the street. This entails reduction of the generous existing 2.5m to 3m wide footpaths to 1.8m, which is consistent with the minimum requirement of the Design Manual for Urban Roads and Streets as applicable to a suburban street with low numbers of pedestrians. The proposed cycle tracks are also of minimum 1.25m width for single file cycling as necessary to fit within the constraints on this street.
- In response to Ballymun Local Area Plan Site 31, it is stated that the Proposed Scheme will require acquisition of a very small area at these lands for the provision of a cycle track and an island bus stop, the impact of this very minor encroachment into the undeveloped lands in the ownership of DCC will be insignificant and can be incorporated into the design of the future proposed site development.
- Access to houses and shopping areas and carparks will be maintained throughout the scheme.
- The rationale for having both single lane and two way cycle tracks on Griffith Avenue - there is a primary school located on Griffith Avenue a very short distance to the west of the Ballymun Road junction. The purpose of the short length of two-way cycle track on the southern side of Griffith Avenue is to enable school children to cycle eastwards to St. Mobhi Road and the adjoining large residential area without need to cross the main road twice.
- In response to concerns about where the inbound cycle track cuts through the footpath at the Junction of Ballymun Road and St. Mobhi Road it is stated that where there is a right-turn pocket for cyclists at the junction to cross from the eastern to the western side of Ballymun Road. The proposed footpath along

this section will be 1.8m wide, similar to the rest of St. Mobhi Road. In the detailed design development there is the potential for refinement to widen the footpath a little through adjustment of the cycle track alignment locally.

- Applicant has responded to each query raised by DCC within the submission in terms of detailed design clarification and justification.
- With regard to bus stops on Prospect Road it is outlined that the reason for the two closely spaced bus stops at this location is to provide enough capacity for the expected large numbers of passengers that will alight from buses on the two BusConnects Spine Routes E and F that overlap briefly on Prospect Road and where there will be interchange with both the proposed Metrolink and DART West railway services at the proposed Glasnevin Station on the opposite side of the road.
- Space is limited at the northern bus stop so that only the narrow island bus stop can be accommodated. In this context cyclists will be required to stop to allow alighting and boarding bus passengers to cross the cycle track, possibly with activation of the proposed pelican traffic signal.
- In relation to the shared surface at Whitworth Road the applicant states that with the complexity of pedestrian and cyclist movements in multiple directions at this location it would not be feasible to provide segregation of modes. Such shared arrangements are the norm on greenways and extend for very long distances. Short distances of this arrangement are proposed along the route in order to prevent cyclists sharing within general traffic.
- Road safety audit has been carried out for the proposed scheme and did not find any conflict with proposed parking on Church Street Lower.
- It is not intended to relocate the existing southbound bus stop that is located at the Met Éireann office further west.
- Flooding on cycle tracks will be prevented through design and implementation of SUDs measures and will liaise with DCC in this regard.
- In response to bus shelters near Protected Structures I note that the applicant states that new bus shelters will be retained and old ones replaced. No change to bus stops is proposed in terms of visual impact at these locations. Bus

Shelters are stated to be of a high-quality design, constructed largely of glass panels with slimline stainless-steel frames. They are discreet and highly transparent so as to have minimal visual impact on their surroundings. This type of bus shelter is widely used across Dublin and was designed for use in visually sensitive locations, including in proximity to protected structures and historic buildings. They are already in place in 6 of the 7 locations listed by DCC in their submission and at the seventh location there is an older type of bus shelter.

- In relation to cycle surfacing the following is stated: 'The DCC Conservation Section request for an alternative high quality cycle lane surface in-lieu of red tarmacadam in certain locations is impractical in a city where this would require a change of the cycle track surfacing at numerous places. It is questionable if worthwhile benefit would derive from such superficial arrangements on the main arterial streets and roads in the Proposed Scheme. To locally modify the cycle track surface would be inconsistent, and it would diminish the effectiveness of distinguishing that part of the road visually to increase awareness of vehicle drivers of the need to safeguard the road space allocated to cyclists for safety reasons'
- No south bound bus lane on constitutional hill, road widening will require the removal of trees which will be replaced along the western side of the southern section of Constitutional hill.
- Under the relevant legislation, upon the completion of the construction of the Proposed Scheme the NTA automatically ceases to be the road authority and the status of DCC as the relevant road authority is automatically restored – it does not require the operation of the conventional "taking-in-charge" arrangements provided for elsewhere in legislation.
- Details of street furniture and the palate of materials to be used will be decided in consultation with DCC.
- Further consultation with DCC will be carried out in relation to items such as water drinking fountains, art, side road entry treatments, signage (most will be retained with minimal new signage), compound proposed at Constitutional hill (at lands under utilised at present).

- In relation to footpaths it is stated that widths will be retained with the exception of Mobhi Road. The details of the existing and proposed footpath widths are tabulated in the Preliminary Design Report (Supplementary Information lodged with the scheme application) in Table 4-2 on pages 35 to 44.
- Landscaping has been designed in consultation with an arborist.
- Trees on Mobhi Road – construction method will protect trees, concrete will be hand sawed and grass area hand dug. At Na Fianna, and at Home Farm Football Club, the existing large conifer trees along the boundary will be removed to enable widening of the footpath and cycle track along the eastern side of the public road. Replacement planting of new trees is proposed, subject to agreement with the property owners. New trees are expected to be deciduous.
- Commentary is provided in relation to the recommended conditions, of note are the recommended conditions in relation to the hand over at the scheme completion. It is clearly outlined that the NTA are only the road authority during the works and all lands and infrastructure revert to DCC as the road authority upon completion.

Response to DAU

4.5. In relation to archaeology the proposed condition to appoint a suitably qualified archaeologist is noted and engagement with all relevant stakeholders in this regard will be ongoing.

4.6. In relation to otters it is stated that provision for commuting otters has been included in the design of footbridge over the Royal Canal. Measures for the protection of water pollution are outlined in the EIAR, nonetheless it is stated that liaison with the relevant stakeholders will continue.

Response to Inland Fisheries

4.7. Section 13.5 of Chapter 13 (Water) in Volume 2 of the EIAR sets out the measures envisaged to avoid, prevent or reduce any potential significant adverse effects on the environment identified in Section 13.4 and, where appropriate, identify any proposed monitoring of the efficacy of implementing those mitigation measures.

4.8. A clear span footbridge is proposed over the Royal Canal which will not impede the canal channel and any fish movements. During the construction works it is proposed to lower the water level in the canal between the 4th and 5th locks to facilitate the works, but a minimum 0.5m water depth will be retained at all times to support aquatic life in the canal. On each bank of the canal, passageways will be provided for otters, and other mammals.

4.9. **Third Party Observations**

4.10. 65 no. third party submissions have been received and are summarised within Appendix 1 hereunder. It is of note that concerns raised are generally common to all submissions received from third parties, for example many submissions are concerned with the proposed bus gate at Mobhi Road, and the use of island bus stops. 4 no. submissions request an Oral Hearing to be held. Issues raised in submissions are summarised as follows, I refer the Board to Appendix I of this report to view a summary of individual submissions.

<u>Impact to schools</u>

- Concerns about the safety of school children due to diverted traffic and increase in air pollution at schools at St. Mary's HFC, Old Finglas Road, St. Brigid's GNS Old Finglas Road and Glasnevin Educate Together, Griffith Avenue. It is stated within many of the submissions that the proposed development will impact the students of these schools both whilst attending school and on their commute to the school.

<u>Diverted traffic & Congestion at:</u>

- Concerns are raised about the traffic that the proposed Bus Gate will divert onto Botanic Road – Glasnevin Hill – Old Finglas Road – Cremore Villas – Griffith Avenue.
- Some submissions raised concerns about the traffic congestion at Griffith Avenue which induces rat running up along Ballygall Road to St Canice's Road and St Pappin Road, with the subsequent impact on these residential areas.
- Diversions will worsen congestion on Old Finglas Road.

General Concerns

- Concerns are raised in relation to the proposed replacement bus stop at Mobhi Road in the footpath opposite the small parade of shops, the third parties are concerned about a loss of parking and accessibility for deliveries.

  Loss of parking at 2 Ballymun Road – residents request a justification for the narrowing of the road.

- Lack of engagement is a concern raised, and non-compliance with Aarhus Convention.
- Concerns raised in relation to incorrect labelling of plans.

Project Design

- Concerns are raised in relation to the design of the project including the bus gate at Mobhi Road and the access to the cycle track along the Royal Canal from Phibsborough. The provision of an access ramp between North Circular Road and Royal Canal Bank Park and the use of island bus stops, removal of green space at Claremont Lawns/ Finglas Road, junction design for cyclists and appropriateness of left turning movements for cyclists with traffic. The width of cycle lanes and footpaths and provision of links to housing and alternatives for quiet streets.
- Traffic calming in Glasnevin and Iona district is sought and a 30km speed limit.
- Additional biodiversity is sought.
- Need for traffic lights at the junction of Botanic Avenue and Botanic Road.
- Restriction of right-turn eastbound on Botanic Avenue onto St. Mobhi Road southbound should be permitted for local access only.
- Impacts arising from the loss of right turn onto Canice's Road.
- Loss of trees along the scheme.
- Impact to private property accesses.
- Premature pending metrolink.
- Lack of consideration of cumulative effects.

- Request for loading bays along the route.
- Objects to opening of wall adjacent to 117 North Road due to antisocial behaviour.
- Parking to be retained for businesses on Triangle at Ballymun Road.
- Lack of connected routes to Basketball club.
- Concerns relating to protection of cyclists at Doyles Corner.
- Request for a safe pedestrian crossing at bus stop no. 37 near Albert College Lawn.
- Objection to opening of the cul de sac on Albert College Lawn onto Ballymun Road.
- Concerns raised in relation to increase in traffic to St. Pappins Road.

Phibsborough Shopping Centre

- Concerns are raised in relation to the loss of carparking.
- It is requested that the left turning for deliveries is retained.

Clearwater Shopping centre

- In relation to clearwater shopping centre, concerns are raised in relation to the removal of the left turning slip lane onto the Finglas Road
- Inclusion of guide lane markings for HGV should be provided.
- Kerbs to be softened at radius of the junction ensuring that junction is widened and a reduction in the central median.

Ballymun Tesco Distribution Centre

- It is requested that works do not prohibit the safe access and egress of this centre.

NTA Response to Submissions

The NTA has responded to each submission individually within Section 3 of the response to submissions document and I refer the Board to same for further detail. Many of the issues raised are similar in nature and I will therefore outline the NTA's response to the issue raised rather than outline the response to each individual

submission and where there are standalone issues raised I will refer to the particular submission and summarise the response accordingly.

Diversion of bus gate at St.Mobhi Road and related impacts raised within submissions.

- It is stated that the proposed works will reduce traffic into and out of the city. A reduction of -36% in car passengers towards the city centre in the morning peak hour and a corresponding increase of + 34% bus passengers and +17% walking and cycling. Those trips that shift mode in the morning will also return in the evening by the same mode. These reductions will spread out across the road network onto most of the adjoining streets. It is anticipated that the dispersed traffic will follow different routes and therefore the volume of diverted traffic on individual routes will not be significant.
- It is acknowledged that on some localised routes there will be an increase in traffic. Ballygall Road East and Cremore Villas will see an increase of 266 additional vehicles per hour, however this increase has not been considered significant within the EIAR assessment.
- A net reduction of -192 will occur on the Old Finglas Road and -103 on Glasnevin Hill. This is likely due to traffic using Finglas Road from Hart's Corner rather than Botanic Road and continuing north past the junction at Old Finglas Road due to the overall reduction in traffic flow along that route. Many drivers will choose alternative routes from close to the origin of their trip rather than directly re-routing just before the Bus Gate section, which will limit the amount of traffic that would turn left at the southern end of St. Mobhi Road and proceed along Botanic Road and Glasnevin Hill instead.
- The overall effect of the Bus Gate on St. Mobhi Road will therefore be to lead to an increase in traffic on just a section of one alternative route at Cremore Villas and the southern end of Ballygall Road East. The traffic model does not indicate any appreciable change in traffic further north at St. Canice's Road or St. Pappin Road.
- It is stated at Griffith Avenue junction, existing on carriage way cycle lanes will be removed and placed within the verge.

- There is existing traffic pressure on Finglas Road at the Old Finglas Road junction in the northbound right-turn direction where the turning traffic queue can exceed the length of the right-turn lane. In the Proposed Scheme this right turn lane will be lengthened from 35m to 70m thereby doubling the storage capacity. The traffic model indicates a significant reduction in traffic along Finglas Road generally, and more signal time can be allocated to the northbound right-turn as necessary to eliminate any queuing and delay
- In relation to safety near schools this is stated to not be an issue in the context of the proposed Bus Gate at St. Mobhi Road and the operational hours for the Bus Gate will commence at 4pm after the schools finish for the day. In addition the Proposed Scheme will greatly increase the cycling facilities in the general area, with an upgrade from cycle lanes to segregated cycle tracks on Glasnevin Hill, and on Ballymun Road northbound to Griffith Avenue
- The no. 83 bus will increase in speed overall due to bus priority measures proposed in the wider scheme.
- Glasnevin village will receive some diverted traffic but this is stated to be minimal, and several improvements are proposed in the village as a result of the proposed scheme which are outlined in section 2.2.3 of the NTA's response and include public realm, cycle and pedestrian improvements and traffic calming measures.

<u>Oneway south bound traffic restriction on Ballymun Road.</u>

- If road was open to north bound traffic it would attract traffic from the Mobhi Road bus gate. It is more preferable that traffic disperses onto wider more suitable roads rather than relocate to the Ballymun road where width are restricted and compromised by parked cars.
- It is in the interest of the wider community in the Glasnevin area for the displaced traffic to be dispersed as widely as possible by not providing a simple and attractive alternative route to St. Mobhi Road. In this respect the restriction of the narrow section near the southern end of Ballymun Road to one-way southbound will be helpful in deflecting through traffic away from the area from as far upstream as Hart's Corner.

Width of footpath on Mobhi Road

- A major factor raised by many people in the early public consultations for the Proposed Scheme was the desire to retain the existing mature plane trees along St. Mobhi Road. To enable the trees to be retained the Proposed Scheme will reduce the existing 2.8m wide footpaths to 1.8m which is the minimum permitted in the Design Manual for Urban Roads and Streets.
- A wider 2.5m footpath is proposed along the frontage of the schools and sports clubs on the eastern side of the road where pedestrian activity is greater, linking to the River Tolka corridor which connects east and west to the wider neighbourhood. Only a narrow 1.25m cycle track can be provided between the footpath and the trees, which will provide for single file cycling.
- An embedded kerb separator is proposed to delineate the separation of the cycle track from the footpath, which will assist the safety of both pedestrians and cyclists in this location where space is constrained.
- At Na Fianna, and at Home Farm Football Club, the existing large conifer trees along the boundary will be removed to enable widening of the footpath and cycle track along the eastern side of the public road. Replacement planting of new trees is proposed, subject to agreement with the property owners as this planting will be located on the retained private lands. It is not therefore appropriate to show such details in the Proposed Scheme drawings prior to the necessary agreement of the landowner.

Bus Shelter on Mobhi Road (no. 167)

- There is an existing bus stop at this location which serves a large catchment area, and it will remain essential for access to the bus services on the existing bus routes and the proposed Spine E route. The new shelter will be located 1.5m further from the building frontage.
- Island bus stops are proposed generally along the Proposed Scheme to separate cyclists from the boarding and alighting activity at the bus stops for safety reasons, and also to reduce delay for cyclists who will bypass the bus stop zone. In this case the removal of the existing bus layby will allow the proposed cycle track to replace the existing bus shelter which will be moved

further out towards the road and away from the building. The effective width of the footpath in front of the shops will actually increase slightly by 0.25m in the Proposed Scheme.

- No impact to pedestrian safety due to increase in footpath width at this location.
- No loading bay at this location so the situation remains as is at present.
- Construction will be short term and will have limited impact to businesses.

Public Consultation

- The first issues responded to relates to compliance with the Aarhus Convention and the Kazakhstan advice. Ireland obligations under the Aarhus Convention has been fully incorporated into Irish Law and it is considered that the proposed development and associated consultation is in accordance with same.
- It is stated that three rounds of consultation were undertaken with a number of methods used.
- A second round of non-statutory public consultation ran from 4th of March 2020 to 17th of April 2020 but shortly thereafter due to the Covid-19 pandemic and the various government restrictions, all events forming part of this second round of non-statutory public consultation scheduled after 12th of March 2020 were cancelled. However, as the NTA had already received some written submissions by that date, the decision was made not to close the consultation entirely but instead to allow written submissions to continue to be made up until 17th of April 2020 which was the original deadline for such submissions. To further facilitate public engagement and participation, a third round of non-statutory public consultation took place from 4th of November 2020 to 16th of December 2020. With the continuing effect of the Covid-19 pandemic and associated government restrictions, the third round of non-statutory public consultation was held largely virtually.

Phibsborough Section of route

- Cyclists will be permitted to use the bus lane through Phibsborough where a 30km speed limit applies. Where there are short gaps in the bus lanes at particularly narrow sections of the streets, linking cycle tracks are provided so that cyclists will have a continuous facility that does not require use of the

general traffic lane at any point. This arrangement is the best that can be achieved, and it provides a reasonable balance overall with two alternative routes available for cyclists through Phibsborough.

- The 30km speed limit will apply to the urban village centre along Phibsborough Road from Connaught Street at the northern end to Monck Place at the southern end. 40-50km/h will apply outside of these extents.
- In relation not the Royal Canal 'Quiet Street' route conflicts with traffic on sections is unlikely with low traffic volumes observed.
- In relation to Air quality it is stated that the Operational Phase of the Proposed Scheme will generally have a neutral impact on air quality, and as a result no mitigation or monitoring measures are required.
- Covid samples during full lockdown are not used within the modelling for air quality.
- WHO guidelines do not have any impact on assessment results. Air quality is assessed in accordance with the mandatory limits.
- In relation to particulate matter - Department for Environment, Food & Rural Affairs (DEFRA) emissions factor toolkit (EFT, v10.1) was used to calculate PM emissions for the assessment. The EFT calculates emissions which take into account vehicle exhaust, brake wear, tyre wear and road abrasion for both PM10 and PM2.5, with non-road emissions ranging from 75% to 91% for PM10 and 62% to 84% for PM2.5 for the Proposed Scheme study area. 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 the 2028 and 2043 emissions

<u>Response to issues raised in relation to Constitutional Hill & Church Street</u>

- In response to Brendan Heneghan's submission the NTA has stated that priority for buses will be provided with dedicated bus lanes over most of this section, with three short gaps where Signal Controlled Priority will be provided instead 3 locations on Church Street Lower.
- Church street is serviced by the no. 83 and no. 23 and 24 which cross the city linking communities not on the main routes.

- Cyclists can use either the bus lanes on Church Street, or the parallel quiet streets route through the Markets Area, so they are well provided for in this section of the Proposed Scheme.
- Church Street will see a reduction in cars from 900 to 600 and the closure of Caple Street will result in the dispersion of circa 300 cars which is considered low and will disperse across the city without significance.

Sections 5, 6 & 7: Finglas Road from St Margaret's Road to Hart's Corner

- The response to submissions in relation to this section of the route are summarised as follows:
    - The opening of a wall near to No.117 North Road, Finglas will provide a more direct link to the new bus stop. The opening up of the currently enclosed area under the footbridge will bring increased pedestrian activity which should deter anti-social activity compared to the current situation.
    - In response to Tesco at Clearwater Shopping Centre it is stated that tight roads and turns are intentional to slow traffic down. The proposed road layout fits the swept-path of large lorries but avoids excessive road space that would encourage faster traffic movements.
    - In response to the loss of green space to accommodate parking at Glasnevin Cemetery, it is stated that due to the volume of people attending the cemetery any loss of parking would result in parking in nearby residential streets and as such parking lost will be replaced at this location and will only result in a 5% loss of the green area.

In relation to bus time savings it is stated that these vary but overall bus priority measures will improve journey times.

NTA response to Annemarie and Ciaran Rogers

- In response to it is stated that the Proposed Scheme will not change the existing uncontrolled parking arrangements on Ballymun Road south between Church Avenue and Charlemont Avenue. It is proposed to restrict the road to northbound traffic so as to avoid an increase in two-way traffic on the narrow street.

- At the junction of Church Avenue a traffic island will be provided to close off the western side of the road to northbound through traffic.
- Emergency vehicles will not be restricted by the oneway system.

NTA response to Cabra Park Residents Association (Samir Eldin)

- A response in relation to cycle infrastructure and connectivity has been outlined above.
- In relation to biodiversity it is stated that a new planted median island with additional trees in the centre of Phibsborough Road between the Royal Canal and Munster Street as shown on Sheet 13 of the drawings in Figure 3-7 is proposed. In busy pedestrian areas it is not practical to provide much planting where space is limited and damage by trampling is likely, which is why there is not more planting included in the Proposed Scheme.
- Hierarchy of paving is proposed to define areas as key urban nodes and provide legibility in the landscape.
- The standard regulatory sign (F360) for a bus lane includes a cycle symbol to reflect that the bus lane is for the use of cyclists as well.
- An accessible ramp is included in the Proposed Scheme between North Circular Road and Royal Canal Bank park.

In response to additional queries raised by Carmel Sherry

- There is an existing northbound advisory cycle lane on Botanic Road beside the Botanic Gardens. This road is too narrow for a segregated cycle track, so instead cyclists can follow the proposed cycle track on St. Mobhi Road and then along the Tolka Valley Cycleway beside St. Mobhi Drive which links to Glasnevin Hill and Ballymun Road where the existing cycle lanes will be upgraded to segregated cycle tracks.
- The proposed footbridge over the Royal Canal will cross over the water channel at a high level with vertical clearance for boats to pass underneath.

In response to an additional issue raised by Ciaran and Laura Byrne

- It is not proposed to restrict the right-turn eastbound on Botanic Avenue onto St. Mobhi Road southbound. This submission refers to a sign for a proposed

northbound right-turn restriction from St. Mobhi Road into Botanic Avenue eastbound towards Drumcondra, which will avoid delay for northbound buses. There are alternative routes for local traffic instead.

In response to CIE

- The biodiversity garden and existing advertising hoarding will be retained. NTA will collaborate with CIE and the local community group to further develop a design for the Broadstone Pocket Garden that is sensitive to the biodiversity planting, as well as providing improved public access and maintenance.

In response to additional issues raised by John Deegan & Nóirín Finnegan, 32 St. Mobhi Road, and Brian McCormack, 45 St. Mobhi Road

- In relation to the tree outside no. 30/32 St. Mobhi Road the arborist report states that the tree is deadwood throughout and in a state of decline.

In response to additional issues raised by Kevina McGill, 50 Dean Swift Road,

- Cumulative impacts of other projects including the Blanchardstown CBC and potential traffic displacements have shown there to be an overall reduction in traffic flows on all the main radial roads in Dublin as a result of mode shift form private transport to public transport as the integrated network is developed.
- Construction impacts of the Proposed Scheme with Metrolink if constructed concurrently are stated to be “localised Moderate and Temporary / Short-Term most notable at the locations of the proposed Metro stations between Glasnevin and Ballymun.

In response to additional issues raised by Lesley Hewson, Lorraine Rooney & Alfreda Kavanagh

- Public realm scheme is proposed in heart of Glasnevin village at junction of Botanic Road / Botanic Avenue / Glasnevin Hill. Improved pedestrian access from church to shops will be provided.

In response to additional issues raised by Senator Marie Sherlock

- Two-way cycle track on Prospect Road is 3 m wide with an effective width of 2.5m, the minimum required is 2.25m.

- Additional space on the cycle lane would require the acquisition of lands from 21 houses that have small front gardens, the section of cycle track is 200 m long. Cyclist traffic is expected to be quite tidal on the radial route to and from the city centre, which will allow overtaking against the low opposing flow of cyclists. The Proposed Scheme provides a continuous segregated cycle track compared to the original proposal in the Emerging Preferred Route
- The Royal Canal quiet street is two way and narrow and such scenarios are common across Europe.
- On the northern part of this route at Eglington Terrace at the side of Mountjoy Prison a south bound cycle lane will be provided for ease.
- Pedestrian security at the underpass at North Circular Road will be assisted by the proposed 19m wide span of the bridge which is greater than the 16.7m length of the bridge. There will be public lighting at night and the approaches will have good through visibility.
- NTA notes the recent planting at Broadstone pocket garden, and this will be adapted into the proposed further improvement of this small park area in the Proposed Scheme.
- There is no existing loading bay between St. Mobhi Road and Hart's Corner. However, this submission probably refers to the loading bay on Botanic Road at the corner with Botanic Avenue, which will be retained in the proposed scheme but shifted slightly south.

<u>In response to an additional issue raised by Martina Creaven</u>

- The operation of the traffic signals on Old Finglas Road at the junction with Cremore Villas / Addison Park will be adjusted to reflect changes in traffic flows and will include suitable provision for the eastbound right-turn into Addison Park.

<u>In response to additional issues raised by Senator Mary Fitzpatrick</u>

- Removal of trees is kept to a minimum in overall terms there will be a net increase of 236 (21%) trees along the route.

- Provisions for loading: In general the existing loading bays are retained on the Proposed Scheme, with possible minor adjustments of the locations.
- Requests for loading to be permitted from bus lanes where there is no nearby loading bay can be considered by the NTA in conjunction with Dublin City Council as an operational matter on a case-by-case basis.

Response to additional issue raised by Paul McAuliffe TD

- Construction impacts as Casement Park, Finglas: The Proposed Scheme will require Construction Compound F1 to be located in this public park area, and it is likely to be required for the full 2 years duration of the construction.
- All other queries are responded to within the responses outlined above.

In response to additional issues raised by Richard & Susan Dunne, 25 Glasnevin Hill and Collette Casey, 63 Glasnevin Hill

- The General Arrangement Drawing Sheet No.21 shown in Figure 3-6 indicates provision of 9 new on-street parking spaces on the western side of Glasnevin Hill beside No.34 & 38. The existing road is unusually wide at this location at the entrance to the Bon Secours Hospital and the additional parking can be provided by minor adjustments of the road layout without encroachment into the adjoining properties, for which there is a planning permission for development.

In response to additional issues raised by St. Vincent's Basketball Club

- Existing cycling facilities at the junctions of Griffith Avenue with Ballymun Road and St. Mobhi Road will be modified as part of the Proposed Scheme to move off the road surface and onto the grass verges. All junctions on this CBC, and the other CBCs in Dublin will be modified in a similar way so that they will become the standard arrangement with which drivers and cyclists will become familiar with to ensure that cyclists have appropriate protection from traffic.
- Improved cycling facilities along Finglas Road are included in the Proposed Scheme.

In response to additional issues raised by Residents of Albert College Lawn.

- Pedestrian access to the bus stop from Albert College Lawn will be the same standard arrangement as for all island bus stops.

- There is a large beech tree located south of the footpath link between Ballymun Road and Albert College Lawn, no works will occur at this location.
- Works in this area are of a short duration and will not impact residents signficantly.

5.0 **Planning History**

- ABP-314691-22 Appeal refused at Corner of Church Street Upper and Brunswick Street North: application for the construction of 52 residential units (each with private balcony/terrace) within three apartments blocks ranging from 3 to 8 storeys
- ABP-315062-22 Permission granted at Daneswell Place, former Printworks/Smurfit Site, Botanic Road, Glasnevin, Dublin 9 for 168 no. apartment units.
- Part 8 Proposal 3131/22 (LAW) – Permission granted at Ballymun Civic Plaza, Shangan Road, Ballymun, Dublin 11: development to improve the public realm.
- DCC4145/22 Permission granted at 364-374 North Circular Road, Royal Canal Bank and 168-169 Phibsborough Road (former Des Kelly site): mixed use development with two retail units, coffee shop and 80 apartments ranging in height from three to eight storeys.
- ABP-308875-20 – Permission granted at Phibsborough Shopping Centre: Build to Rent Shared Accommodation and other minor alterations to the permitted development.
- ABP-309345·21 Permission granted at Old Bakery Site 113 Phibsborough Road, Cross Guns Bridge, Phibsborough: 205 No. Build to rent units.
- ABP- 310686-21 Permission granted at 146-147 Phibsborough Road & 10 Eglinton Terrace, Dublin 7. mixed-use block consisting of a restaurant & cafe space and 17 No. apartments in 2. no blocks of six storeys.
- DCC 2080/17 Permission granted at Dominick Street Upper: 6 storey over lower ground floor/basement level student accommodation development with 247 no. bed spaces.

- ABP- 248726- 17 Permission granted at North Circular Road, Dublin 7: student accommodation development with 444 no. bedspaces (420 bedrooms) in 9 no. blocks which range in height from 1 no. storey to 7 no. storeys.
- ABP-244466 – 15 Permission granted at 27-31 Church Street, Dublin 7: student accommodation with 232 no. bedrooms.

6.0 Policy Context

6.1. European

6.2. 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.

6.3. 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.

6.4. 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 sustainably. The provision of well planned, affordable or free public transport system and bicycle lanes are encouraged.

6.5. **National**

6.6. **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.

6.7. **National Sustainable Mobility Policy Action Plan 2022-2025**

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

6.8. **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.

6.9. **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

6.10. **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.

6.11. 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.

6.12. 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.

6.13. 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.

6.14. **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.

6.15. **Climate Action Plan 2023**

- The Climate Action Plan (CAP23) sets out a roadmap to halve emissions by 2030 and reach net zero by 2050. CAP23 will also be the first to implement carbon budgets and sectoral emissions ceilings that were introduced under the Climate Action and Low Carbon Development (Amendment) Act, 2021. Sector emission ceilings were approved by Government in July 2028 for the electricity, transport, built environment – residential, built environment – commercial, industry, agricultural and other (F-gases, waste & petroleum refining) sectors. Finalisation of the emissions ceiling for the Land Use, Land Use Change and Forestry (LULUCF) sector has been deferred for up to18 months from July 2022.
- 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 CAP23 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 CAP23 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. CAP23 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 will be developed in 2023 with the aim of reducing travel demand and improving sustainable mobility alternatives.

- The major public transport infrastructure programme set out in the NDP rebalances the share of capital expenditure in favour of new public transport schemes over road projects. BusConnects in each of our 5 cities, the DART+ Programme and Metrolink will continue to be progressed through public consultations and the planning systems. BusConnects is a key action under the major public transport infrastructure programme to deliver abatement in transport emissions, as outlined in CAP23 for the period 2023-2025.

Cycle Design Manual, NTA, 2023

This new Cycle Design Manual supersedes the National Cycle Manual. The new manual draws on the experience of delivering cycling infrastructure across Ireland over the last decade, as well as learning from international best practice, and has been guided by the need to deliver safe cycle facilities for people of all ages and abilities.

6.16. **Regional**

6.17. **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.

6.18. **Local**

Dublin City Development Plan 2022-2028

- Chapter 8 Sustainable Movement and Transport
    - Table 8.1 Current and target mode share outlines that cycling is expected to increase by 7% by 2028 and bus 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. The impact of public transport infrastructure projects on mode share is more likely to come into fruition during the lifespan of the following plan.
    - Dublin City Council recognises and welcomes the opportunities for developing public realm around the city and in the urban villages where new public transport proposals are being developed such as Metrolink, BusConnects and the Luas expansion and DART+ project.
    - 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.
    - 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

- SMTO21 - To seek improvements to Cross Guns Bridge for pedestrian and cycle users, taking into consideration the BusConnects and Metrolink projects.
- It is acknowledged that new street/road infrastructure and improvements to existing streets/roads will be required over the period of the plan. In some instances, the development of new areas is predicated on the delivery of new street/road connections such as the new networks in Belmayne, Ballymun, and Cherry Orchard

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:

- 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.

6.19. **Ballymun Local Area Plan 2017 (extended to October 2027)**

- MO3: Facilitate the delivery of a core bus corridor through Ballymun as proposed in the NTA transport strategy.

6.20. **Fingal County Development Plan 2023-2029**

Fingal is set to benefit from major rail and bus projects such as MetroLink, BusConnects and DART+ and LUAS Expansion under the National Development Plan 2021–2030. These projects are identified as key growth enablers for Fingal in the NPF and will significantly increase capacity and allow more services to operate across the region, facilitating Fingal's vision for compact growth and sustainable mobility, serving key destinations and facilitating opportunities along the route for high-density residential development, mixed-use and employment generating activities.

MRE – Metro and Rail Economic Corridor.

Objective Facilitate opportunities for high-density mixed-use employment generating activity and commercial development and support the provision of an appropriate quantum of residential development within the Metro and Rail Economic Corridor.

- Policy CSP26 – Consolidation and Growth of Swords - Promote and facilitate the long-term consolidation and growth of Swords as a Key Town including the provision of key enabling public transport infrastructure, including MetroLink and BusConnects, in accordance with the relevant provisions of the NPF, RSES and the MASP
- Objective CMO23 – Enabling Public Transport Projects - Support the delivery of key sustainable transport projects including MetroLink, BusConnects, DART+ and LUAS expansion programme so as to provide an integrated public transport network with efficient interchange between transport modes to serve needs of the County and the mid-east region in collaboration with the NTA, TII and Irish Rail and other relevant stakeholders.
- Objective CMO24 – NTA Strategy Support NTA and other stakeholders in implementing the NTA Strategy including MetroLink, BusConnects, DART +, LUAS and the GDA Cycle Network.
- Section 7.3 - Infrastructure provision will be a key factor for the economic development of the County and the prospective MetroLink, BusConnects and Dart + projects will bring significant economic benefits to Fingal. Transport and infrastructure interventions are expected to facilitate the modal shift in alignment with the policy hierarchy and national, regional and local objectives

such that they encourage sustainable ways of improving Fingal's integration, connectivity and the movement of workers.

6.21. 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.

6.22. **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.

6.23. **Legislative Context**

6.24. 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.

6.25. 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.

6.26. **Natural Heritage Designations**

6.27. The following Special Areas of Conservation and Special Protection Areas are contained within the zone of Influence for the proposed development:

- North Dublin Bay SAC,
- South Dublin Bay SAC,
- Baldoyle Bay SAC,
- Howth Head SAC,
- Rockabill to Dalkey Island SAC,
- Lambay Island 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 and,
- The Murrough SPA..
- North West Irish Sea SPA

6.28. A Natura Impact Statement (NIS) has been prepared with regard to the foregoing 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).

6.29. **EIA Screening**

6.30. 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.

7.0 **Assessment**

7.1. The proposed development as outlined above is essentially an upgrade to the existing bus priority and cycle facilities. The Proposed Scheme includes a substantial increase in the level of bus priority provided along the Ballymun and Finglas roads into and out of the city including the provision of additional lengths of bus lane, resulting in improved journey time reliability.

7.2. Throughout the Proposed Scheme cycle facilities will be substantially improved with segregated cycle tracks provided along the aforementioned roads and protected junctions with enhanced signalling for cyclists provided at junctions. Where space for a segregated cycle track is not available on the main corridor, a number of locations have been identified for alternative cycle routes via quiet roads, the first is proposed from the Quays through the Markets Area to Coleraine Street and then from the Royal Canal Bank to Eglington Terrace where it continues over the Royal Canal via a new cycle and pedestrian bridge. An additional quiet route will be along St. Mobhi Drive.

7.3. Pedestrian facilities will also be upgraded, and additional signalised crossings are to be provided. In addition, public realm works will be undertaken at key locations with higher quality materials, planting and street furniture provided to enhance the pedestrian's experience.

7.4. This application is accompanied by a separate Compulsory Purchase Order ref: ABP-314642-22 in which it is sought to acquire various sections of lands along the route. The majority of lands to be acquired relate to the accommodation of construction compounds and a number of boundary setbacks to accommodate proposed cycle lanes or road widening.

7.5. Given the variety of issues raised within the submissions received, I will consider the issues raised on a themed basis within the relevant sections of the report hereunder. All submissions are summarised within appendix 1 and 2 below for ease of reference and the NTAs response to submissions has been summarised above also.

7.6. I have read the entire contents of the file including the EIAR, Planning Report and supporting documentation and the NIS all submitted with the application. I have visited the subject site and its surroundings. I have read in full the submissions submitted in respect of the application including the third-party submissions, the submissions from the Planning Authorities and the submissions from prescribed bodies. I consider the critical issues in determining the current application before the Board are as follows:

- Principle of development, need and justification.
- Adequacy of Consultation.
- Project Design – Provision for buses, cyclists and pedestrians, Mobhi Road Bus Gate, Traffic calming, Metro.

- Residential Amenity
- Visual Impact
- Property Devaluation
- Phibsborough Shopping Centre.
- Other issues raised in submissions.
- Appropriate Assessment.
- EIAR.

Principle of development

7.7. 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.

7.8. 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.

7.9. 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.

7.10. As noted above, the overriding motivation for BusConnects is to reduce CO_2 emissions and this is critical from a global climatic perspective. The proposed scheme is specifically identified and supported within the Climate Action Plan 2023 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 city which currently experiences significant congestion and impediments to movement and accessibility.

7.11. At the local and shorter-term level, the issue of congestion is more obvious, and both congestion and CO_2 emissions are continuing to rise. Any further increases in traffic levels will see an exacerbation of congestion, CO_2 emissions and of all 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.

7.12. When examining the functionality and capacity of road space to facilitate the movement of people it is important to consider the capacity of the space and how to optimise it. The applicant within the documentation submitted raises the following:

> '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'.

7.13. The prioritisation of buses over cars and the creation of more space for pedestrians and cyclists will therefore allow for increased people movement capacity along the core bus corridor. This is vital given the existing congestion and the forecasted growth in population, jobs and goods vehicle numbers by 2040. The proposed scheme is expected to see a 30% reduction in car use along the route and an increase in cycling and walking of 93%, in addition to a 24% increase in bus use.

7.14. Having regard to the above, the proposed scheme is of critical importance to the transport network in Dublin to facilitate the actual movement of people and this can only be achieved through a realistic modal shift from the private car to sustainable modes. The proposed scheme allows for increased people moving capacity and the best chance to avoid gridlock in future years as the population grows and the demand for travel increases. The proposed scheme also has the potential to reduce Ireland's greenhouse gas emissions signficantly. The proposed scheme will therefore make a significant contribution to carbon reduction, the easing of congestion and the creation of more sustainable travel patterns for the growing population.

7.15. BusConnects 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.

7.16. In terms of local transport need it is outlined by the applicant that bus priority along the proposed route is provided along approximately 47% (outbound) and 51% (citybound), cumulatively equating to approximately 49% 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 buses, enhance their reliability and provide resilience to congestion.

7.17. One of the key objectives of the Proposed Scheme is to enhance interchange between the various modes of public transport operating in the city and wider metropolitan area. The CBC Infrastructure Works, including the Proposed Scheme, are developed to provide improved existing or new interchange opportunities with other existing and planned transport services, including:

- DART stations;
- Existing Dublin Bus and other bus services;
- The Greater Dublin Area (GDA) Cycle Network Plan;
- Future public transport proposals such as the DART+ Programme and MetroLink; and
- Supporting the Dublin Bus Network Re-design

7.18. With regard to cycling it is stated that Segregated cycling facilities are currently provided along approximately 60% of the Proposed Scheme. The remaining extents have non-segregated cycle lanes or cyclists must cycle in the bus lanes where provided, with no provisions in some critical places such as on parts of the Hart's Corner traffic gyratory system. High-quality cycle facilities in the Proposed Scheme will increase to 93% consisting mainly of segregated cycle tracks in both directions and the remainder using quiet streets. The improvements to cycle infrastructure will vastly improve the current offer to cyclists and by doing so will signficantly increase the modal share.

7.19. It is important to note that the Ballymun / Finglas Corridor 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 residential development applications within the planning history section of this report above which will accommodate significant growth in the area of the scheme.

7.20. 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 public transport facility to the most vulnerable in society in a safe, well-lit and protected environment.

7.21. 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 is therefore justified and acceptable in principle.

Adequacy of Consultation

7.22. 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. There are concerns that the public were not made fully aware of the details of the proposed scheme and were not involved in 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. Reference is also made within submissions to the compliance with the Aarhus convention.

7.23. I refer the Board to the NTA's response to concerns raised in relation to the consultation process and consider it important to reiterate at this juncture the key points that have been made within it.

7.24. It is contended by the NTA that compliance with the Aarhus Convention is an integral part of the statutory process and is provided for within relevant legislation i.e. the Planning and Development Regulations, 2001, as amended and the Planning and

Development Act, 2000, as amended. The erection of site notices, publishing newspaper notices, the use of a dedicated website and the seeking of submissions from the public and other stakeholders is required and part of the consenting process carried out by An Bord Pleanala. Given that the applicant has complied with all such requirements I am satisfied that the proposed development process adequately complies with the requirements of the Aarhus Convention.

7.25. I note that as part of the scheme development stage, various non-statutory public consultation processes were undertaken. These processes are in excess of the requirements of the Aarhus Convention, whose obligations are already enshrined in Irish legislation as outlined above.

7.26. It is stated by the applicant that a total of three rounds of non-statutory public consultation were undertaken and every effort was made by the NTA to facilitate public participation and engagement during government restrictions relating to the Covid-19 pandemic. A second round of non-statutory public consultation ran from 4th of March 2020 to 17th of April 2020 but shortly thereafter due to the Covid-19 pandemic and the various government restrictions, all events forming part of this second round of non-statutory public consultation scheduled after 12th of March 2020 were cancelled. However, as the NTA had already received some written submissions by that date, the decision was made not to close the consultation entirely but instead to allow written submissions to continue to be made up until 17th of April 2020 which was the original deadline for such submissions.

7.27. I note that the applicant states that to further facilitate public engagement and participation, a third round of non-statutory public consultation took place from 4th of November 2020 to 16th of December 2020. With the continuing effect of the Covid-19 pandemic and associated government restrictions, the third round of non-statutory public consultation was held largely virtually. As per previous rounds 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.

7.28. 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.

7.29. 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. Based on the foregoing I am satisfied that there has been continued meaningful engagement with the public and other third parties in relation to the proposed scheme.

Project Design

7.30. The overall objective of the scheme design is to provide improved, attractive and safe sustainable transport infrastructure from the city at Arran Quay to Ballymun and Finglas.

7.31. It is important to note at the outset that whilst the applicant refers to the Design Manual for Urban Roads and Streets, 2019. The applicant also refers to a design document, called the Preliminary Design Guidance Booklet (PDGB) which has been developed as a tool for the design of the BusConnects scheme across the city. Whilst this is useful reference for the design justification of the proposed route, I note that the design of the proposed route largely complies with the requirements of DMURS. Any non-compliance with DMURS in terms of lane widths or design will be examined in detail under the relevant heading below.

7.32. It is also important to note that the Cycle Design Manual 2023 has been issued since the submission of this application and I have had regard to this manual in the assessment of the proposed scheme.

7.33. For the purpose of detailing the features of the proposed scheme and as outlined within the development description above, the applicant has firstly divided the scheme into the following seven sections (Section 1 to Section 4 comprise the Ballymun Section of the Proposed Scheme and Section 5 to Section 7 comprise the Finglas Section of the Proposed Scheme):

- Section 1: Ballymun Road from St. Margaret's Road to Griffith Avenue;

- Section 2: St. Mobhi Road, Botanic Road and Diversionary Route from Griffith Avenue to Hart's Corner;
- Section 3: Prospect Road and Phibsborough Road from Hart's Corner to Western Way;
- Section 4: Constitution Hill, Church Street Upper and Church Street from Western Way to Arran Quay;
- Section 5: Finglas Road from St. Margaret's Road to Wellmount Road;
- Section 6: Finglas Road from Wellmount Road to Ballyboggan Road; and
- Section 7: Finglas Road from Ballyboggan Road to Hart's Corner.

7.34. In terms of the current baseline conditions, please refer to the traffic and transport section of the EIAR in section 9 of this report hereunder. I will endeavour to describe the proposed changes within each section as follows, it must be noted that pavement upgrade works, widening and resurfacing of roads, footpaths, cycle tracks and kerbs will occur along the entirety of the route and is relevant to all sections hereunder, as is the introduction of new signage, street furniture and public realm improvements.

Section 1: Ballymun Road from St. Margaret's Road to Griffith Avenue;

7.35. This section has a length of 2,930metres along the R108 Ballymun Road between St. Margaret's Road and R102 Griffith Avenue, including a short section of R108 St. Mobhi Road on the eastern side of the traffic gyratory junction at R102 Griffith Avenue. Additional land is required from public open spaces along the edges of the road within Section 1 at a number of locations, including Construction Compound B1 at the R108 Ballymun Road / R104 Santry Avenue Junction and for working space at seven other locations for boundary works where footpaths will be realigned to suit the proposed road layout at island bus stops.

7.36. General improvements include:

- Priority for buses along the entire length of this section
- Dedicated bus lanes in both directions
- 13 no. Island bus stops, 4 no. shared bus stops
- Removal of 4 no. existing bus stops
- Segregated cycle tracks will be provided in both directions with a raised kerb.

- Reduce footprint of 11 pedestrian junctions.
- Dedicated bus lane and traffic lane in both directions in Ballymun Village.
- Provision of on street parking bays along Ballymun Main Street.
- Minor utility diversions
- Removal of vegetation within the central median and along verges.

Junctions within this section:

- St. Margaret's Road / Ballymun Road – left slip lane removed.
- Northwood Avenue / Ballymun Road - left slip lane removed.
- Santry Cross: Ballymun Road / Santry Avenue - Bus Lanes to the stop line.
- Shangan Road / Ballymun Road – Bus lanes to stop and 1 lane traffic.
- Gateway Crescent / Ballymun Road - Bus lanes to stop and 1 lane traffic.
- Collins Avenue / Ballymun Road - Left-slip lanes removed on east side. Segregated left-turn lanes on Ballymun Road. Protected cycle tracks. Bus Lanes to the stop line.
- St. Pappin Road / Ballymun Road – 3 arm junction.
- St. Canice's Road / Ballymun Road – new signals.
- Ballymun Road / St. Mobhi Road - New southbound right-turn to the western side of the traffic gyratory.
- Ballymun Road / Griffith Avenue – upgrade of junction.
- St. Mobhi Road / Griffith Avenue - No left-turn southbound. Traffic diverted around the western and southern sides of the traffic gyratory system. Proposed northbound bus gate here, no through general traffic except buses, taxis and bicycles.

<u>Section 2: St. Mobhi Road and Botanic Road from Griffith Avenue to Hart's Corner</u>

7.37. This section will be constructed in four smaller sections and will commence at the R108 St. Mobhi Road / R102 Griffith Avenue Junction and will extend for 1.5km to Hart's Corner north of Phibsborough, where it will meet the Finglas Section of the Proposed

Scheme. This section of the scheme will provide a dedicated south bound bus lane but for the majority of the length there will be no dedicated north bound bus lane.

7.38. A bus gate which will operate from 16:00hrs to 20:00hrs will be provided at the St. Mobhi Road on approach to the Griffith Avenue junction.

7.39. A two-way cycle track section proposed on part of the eastern side of R108 St. Mobhi Road to cater for higher flow of pedestrians and cyclists accessing a cluster of schools and sports clubs. The Board should note that Dublin City Council within their submission referred to the need for this two way lane and I am satisfied that the applicant has adequately addressed this by way of facilitating ease of access to sports and educational buildings.

7.40. In this section northbound through-traffic will be diverted at Hart's Corner via R135 Finglas Road instead of R108 Botanic Road. This traffic may then traverse eastward at Old Finglas Road to re-join R108 Ballymun Road at R102 Griffith Avenue.

7.41. A second local traffic diversion route will divert away from R108 St. Mobhi Road along Botanic Road, Glasnevin Hill, Old Finglas Road, Cremore Villas and R102 Griffith Avenue to re-join R108 Ballymun Road. The Board should note that concerns are raised in relation to the capacity of these routes to accommodate additional traffic, this is examined hereunder, however it is important to briefly note at this juncture that there is expected to be a reduction in traffic on many roads and the expected increases on Cremore Villas is not expected to be significant.

7.42. To the west of R108 St. Mobhi Road, a short section of Ballymun Road Lower between Claremont Avenue and Church Avenue will be restricted to a one-way southbound general traffic lane where the road is too narrow for two-way traffic alongside on-street parking, which will be formalised to accommodate the parking needs of residents at houses without driveways. Residents are also concerned about this change, and it has been responded to by the NTA in their response to submissions as out lined above. As stated above, this change is required to prevent traffic from utilising this road as an alternative route and directing traffic in a different direction prior to this point. This is reasonable and will ensure that traffic volumes at this location do not increase signficantly beyond current levels.

7.43. On R108 Botanic Road, south of the junction with R108 St. Mobhi Road, there is a narrow section of street where bus lanes cannot be accommodated. Instead, bus

priority will be provided by signal controls at the upstream approaches to this section in both directions.

7.44. Works also include:

- realignment of a fence and gates at Scoil Chaitríona
- realignment of gates at Scoil Mobhi
- Reconstruction of retaining wall at Home Farm Football Club and relocation of a gate.
- Construction of a section of the Tolka Valley Cycleway parallel to St. Mobhi Drive, and the River Tolka, across open green space
- Urban realm works in Glasnevin Village and St. Mobhi Rd and Botanic Rd.
- A fence and a wall will be realigned at Daneswell Place.
- Minor utility diversions.
- Vegetation will be removed at the entrance to Bon Secours Hospital.
- Removal of trees along R108 Botanic Road, at Daneswell Place.
- Provision of 7 no. share bus stops, 1 no. inline stop, 1 no. layby bus stop and removal of 1 no. existing bus stop.

Junctions within this section include the following:

- St. Mobhi Road / Botanic Avenue – movement improvements
- St. Mobhi Road / Botanic Road - Left slip lane removed at south-west corner.
- Botanic Road / Prospect Way - Existing pedestrian crossings moved from the central island and replaced with direct crossings on each entry arm.
- Hart's Corner (Botanic Road / Lindsay Grove / Prospect Road / Finglas Road) - movement improvements.

<u>Land acquisition locations:</u>

- R108 St. Mobhi Road at Scoil Chaitríona, CLG Na Fianna sports club, Home Farm Football Club pitches and Whitehall College of Further Education for widening works for a footpath and cycle tracks;

- In front of a group of four businesses (No. 163 to 169, St. Mobhi Road) at the junction of R108 St. Mobhi Road and R108 Botanic Road, to provide an Island Bus Stop with a cycle track and footpath around the rear of the bus stop.
- Acquisition at the former Cahill printworks and adjoining Daneswell Place residential development on the eastern side of R108 Botanic Road just north of Prospect Way to accommodate a new northbound bus lane and segregated cycle tracks on both sides.

Section 3: Prospect Road, Phibsborough Road from Hart's Corner to Western Way

7.45. Works within this section commence at the R108 Prospect Road / Lindsay Grove Junction at the southern apex of Hart's Corner and will extend through Phibsborough over a length of 1.2km to the R135 Western Way Junction. It is proposed to construct three new bridge structures and an underpass within this section. Bridges are as follows:

- Single span structure proposed next to the existing bridge over the railway to the south of Lindsay Grove. 6m wide and 21m in length.
- A new cycle bridge over the railway line adjacent to Whitworth Road. Single span bridge, 15m length, 12m wide.
- New cycle / pedestrian steel arch bridge with a perforated deck over the Royal Canal connecting to the Royal Canal Greenway. 6m wide and 17m long

7.46. Under pass will provided under the North Circular Road to allow the unimpeded north-south passage of the cycle lane and footpaths. 16.7m length, 19.2m wide.

7.47. Works along this section of the route include:

- Provision of a two-way segregated cycle track will be provided along the eastern side of R108 Prospect Road to the Royal Canal.
- New pedestrian / cycle infrastructure over the railway at Lindsay Grove and Whitworth Road will be constructed next to the existing railway bridges to facilitate the addition of the cycle track.
- Quiet street cycle way along Royal canal which will pass under the R101 North Circular Road.

- A number of cycle way sections are below the required width within this section due to significant space constraints.
- Trees and vegetation will be removed at the junction of R108 Botanic Road and R135 Finglas Road, along R108 Phibsborough Road, at R108 Constitution Hill, particularly at the Dublin Bus Phibsborough Depot and either side of canal either side of R101 North Circular Road, at the area between R132 Church Street, Coleraine Street and Linenhall Terrace and along R135 Western Way.
- Existing wall at Phibsborough Shopping Centre will be realigned.
- Cellars at Doyle's Corner will not be impacted.
- A new Royal Canal Bank Underpass under R101 North Circular Road to link to Royal Canal cycleway.
- Removal of trees.
- 9 no. inline bus stops
- 1 no. shared landing and island double bus stop.
- For most of Section 3, the cycle route will share the existing quiet residential streets along Royal Canal Bank beside the public park where the former canal channel was filled in. At R101 North Circular Road, an underpass will be provided to bring the cycle and pedestrian route under the very busy street rather than crossing the street at surface level. There was an old masonry arch bridge (Blaquiere's Bridge) at this location when the former canal was in operation, but this was removed when North Circular Road was widened, and the humpback bridge was flattened. The cycle route will intersect R135 Western Way 130m east of the junction with the R108 on Phibsborough Road and Constitution Hill at Broadstone. The cycle route will cross to the southern side of R135 Western Way at a Toucan crossing from where a two-way cycle track will be provided for the connection westwards back onto the bus corridor at the southern side of the Broadstone Junction. Some short lengths of cycle track will be provided where there are three gaps in the bus lanes along R108 Phibsborough Road to accommodate cyclists who choose to remain on the bus corridor instead of taking the alternative route to the east.

<u>Junctions</u>

- Whitworth Road / Prospect Road / Phibsborough Road – general improvements and Southbound signal controlled priority for bus
- Connaught Street / Phibsborough Road - general improvements and New southbound bus lane downstream.
- Doyle's Corner: Phibsborough Road / North Circular Road – general improvements.
- R108 Phibsborough Road / R135 Western Way / Constitution Hill / LUAS Green Line tram - Bus lane to the stop line in southbound direction, not shared with left-turn traffic.

Land Acquisitions

- Private landing areas (permanent) at two businesses on Prospect Road (No. 21 / 22 Prospect Road) beside the railway bridge for the provision of a wider bridge for a two-way cycle track and enlarged footpath area;
- Forecourt area at The Bernard Shaw Public House, Prospect Road; and
- Phibsborough Shopping Centre Car Park.

Section 4 Constitution Hill and Church Street to Arran Quay

7.48. Commences at the R135 Western Way Junction and will extend along R108 Constitution Hill and R132 Church Street for 1km southwards to the R148 Arran Quay / Ormond Quay Junction at the River Liffey, which will be the end of the Proposed Scheme. Priority for buses will be provided with dedicated bus lanes over most of this section, with three short gaps where Signal Controlled Priority will be provided instead at the following locations on Church Street Lower: •

- Southbound from the junction of R804 King Street North to Mary's Lane for a length of 190m;
- Northbound from the junction at May Lane for a length of 60m; and
- Southbound from the junction at Chancery Street for a length of 50m.

7.49. Along R108 Constitution Hill, a two-way cycle track will be provided on the eastern side of the street to connect from R135 Western Way to Coleraine Street. An additional northbound cycle track will also be provided on the western side to connect to the

Technological University Dublin campus at Grangegorman via Broadstone Gate. The main cycle route will follow quiet streets through the Markets Area from Coleraine Street to R148 Ormond Quay. Along Church Street Lower, short sections of cycle track will be provided at the three locations where there will be gaps in the bus lanes.

7.50. Cycle lanes at 5 locations will be under the minimum width due to space constraints and the need to protect footpath widths in these areas. Locations are outlined in table 4.24.

7.51. Works include:

- Loss of 1 no. bus stop, provision of 2 no. shared landing bus stop, inline bus stop, island bus stop and a layby bus stop.

Junctions

- Constitution Hill / Broadstone – general improvements.
- North Brunswick Street / Church Street Upper – general improvements.
- King Street North / Church Street Upper and Lower - general improvements and Southbound signal controlled priority for bus.
- Church Street Lower / Mary's Lane / May Lane- general improvements and Bus priority signal northbound.
- Church Street Lower / Chancery Street / LUAS Red Line tram - Additional pedestrian crossing on the southern arm. Bus priority signal southbound.
- Church Street Lower / Arran Quay / Ormond Quay - general improvements.

Land Acquisitions

- Temporary land acquisition at one location for Construction Compound B3 on a yard area at the Dublin City Council (DCC) public housing block at the Catherine Lane North / Constitution Hill Junction.
- Permanent land acquisition will be required from CIE lands to facilitate the Broadstone Pocket Park urban realm improvement works at Broadstone in Phibsborough.

Section 5 - Finglas Road from St. Margaret's Road to Wellmount Road

7.52. Section 5 of the Proposed Scheme will commence at the northern end at the junction of R135 Finglas Road with R104 St. Margaret's Road and will extend in a south-eastern direction along the Finglas Bypass dual carriageway over a length of 1.1km to the Wellmount Road Junction on the south-western edge of Finglas Village.

7.53. The Finglas Bypass is a segregated dual carriageway road, pedestrians and cyclist will continue to use the adjacent roads and streets. New bus stops will be provided on the Finglas Bypass dual carriageway, just south of the roundabout, to cater for the proposed F1 route bus services that will bypass Finglas Village. To provide access to these bus stops, new footpaths will be provided around the roundabout, with associated signal pedestrian crossings on all four arms of the junction.

7.54. Proposed works include the following:

- Priority for buses will be provided along the entire length of this section of the Proposed Scheme, with dedicated bus lanes in both directions.
- Loss of left turning lane to accommodate a dedicated bus lane.
- Bus lanes will also be provided on the southern slip ramps at the Mellowes Road grade-separated junction to cater for proposed bus route F2 that will serve the north-western area of Finglas.
- A footpath will be constructed through Mellowes Park.
- Trees and vegetation will be removed along R135 Finglas Road, particularly at the R104 St. Margaret's Road Roundabout, at the Finglas Bypass slip roads, and between Church Street and Wellmount Road and .
- Minimum cycle widths will be reduced in 3 instances due to restricted widths and to protect footpaths and in one instance so as not to conflict with the diverge slip ramp linking to Mellowes Road.
- 4 no. bus stops within this section, 3 no. inline and one shared landing.

<u>Junctions</u>

- St. Margaret's Road – major junction – general improvements
- Mellowes Road/Finglas bypass - A new northbound bus lane will be provided on the Finglas Bypass through the junction. Bus lanes will be provided on the southern slip ramps.

- Church Street - Left-in / left-out junction on the western side only. Northbound bus lane provided through the junction. Northbound cycle track provided through the junction. Signal toucan crossing provided on the southern side across the Finglas Road. Signal pedestrian crossing provided on the eastern Church Street arm.

Land Acquisition

- Temporary at Construction Compound F1 at Mellowes Park at the northern extent of Section 5.

Section 6: Finglas Road from Wellmount Road to Ballyboggan Road

7.55. Section 6 of the Proposed Scheme will extend along R135 Finglas Road from the Wellmount Road Junction to the Ballyboggan Road Junction, over a length of 1.6km. Priority for buses will be provided along the entire length of this section of the Proposed Scheme, with dedicated bus lanes in both directions. Segregated cycle tracks will be provided in both directions along the full length of this section of the Proposed Scheme. Works include:

- Deviation of cycle track widths at various locations to avoid trees.
- 10 no. bus stops, 9 n0. Island bus stops and 1 no. shared landing bus stop.
- Trees and vegetation will be removed along R135 Finglas Road, along the verges, and the central median.
- At Clearwater Shopping Centre, the removal of the left-turn slip lane at the north-western corner will allow for the creation of a proposed urban realm area.

Junctions

- Wellmount Road / Finglas Village – general improvements
- Finglas Place / Finglas Road – general improvements and Southbound left-turn lane.
- Clearwater Shopping Centre / Glenhill Road / Finglas Road - Slip lanes and corner islands removed for shorter pedestrian crossings. Segregated southbound bus lane to the stop line not shared with left-turn traffic. Segregated northbound bus lane to the stop line with a separate left-turn lane on the inside. Left-turn traffic segregated from bus and cyclist traffic. 4 pedestrian and cyclist

crossings where there are 2 at present. Protected corners and turning facilities for cyclists.

- The Griffith / Finglas Road - Pedestrian crossing on Finglas Road straightened with stagger removed.
- Tolka Valley Road / Finglas Road - Northbound left-turn traffic lane. New cycleway facilities on Tolka Valley Road.
- Old Finglas Road / Finglas Road - Southbound left-turn traffic lane. Additional pedestrian crossings on east and south arms.
- Ballyboggan Road / Finglas Road - Northbound left-turn traffic lane and left-slip lane removed. Shorter and simpler pedestrian crossings.

Land Acquisition

- Temporary land acquisition at the open green space at Finglas Place for proposed Construction Compound F2.

Section 7: Finglas Road from Ballyboggan Road to Hart's Corner

7.56. Section 7 of the Proposed Scheme will extend along R135 Finglas Road for a distance of 1.5km to Hart's Corner where it will meet the Ballymun Section of the Proposed Scheme. Priority for buses will be provided along the entire length of this section of the Proposed Scheme, with dedicated bus lanes in both directions. This will require road widening over a length of 330m in front of Glasnevin Cemetery at St. Vincent's School on the western side and at part of Bengal Terrace on the eastern side.

7.57. South of Claremont Lawns, alongside Glasnevin Cemetery, the existing on-street parking will be removed and replaced with a new parking facility with the same number of spaces, which will encroach into the open public space at Claremont Lawns. Segregated cycle tracks will be provided in both directions along the full length of this section of the Proposed Scheme.

7.58. Reaching Hart's Corner, the southbound traffic turns left into Prospect Way, which is the northern side of the one-way triangular gyratory traffic system at Hart's Corner. A two-way cycle track will be provided along the northern side of Prospect Way to connect to the proposed two-way cycle track along the eastern side of R108 Prospect Road, as described in Section 2 of the Proposed Scheme. This will allow cyclists to

circulate around the northern and eastern sides of Hart's Corner, fully segregated from traffic.

7.59. Works include:

- Provision of 7 no. bus stops, 4 no. island bus stops and 3 no. share landing bus stops.
- A wall along R135 Finglas Road, at the junction of Slaney Road, will be realigned.
- Trees and vegetation will be removed along R135 Finglas Road, along the verges, and the central median.
- At the public park area at Claremont Lawns, extensive works will be carried out for the construction of a new car park opposite Glasnevin Cemetery.
- A fence will be realigned, and a gate will be relocated along R135 Finglas Road, opposite Glasnevin Cemetery.
- A fence will be realigned, and gates will be relocated at St. Vincent's School.
- A fence will be realigned, and gates will also be relocated at 34 to 42, Finglas Road.
- Some minor utility diversions and / or protections will be required.
- Trees and vegetation will be removed along R135 Finglas Road, particularly at St. Vincent's School.

Junctions

- Slaney Road / Finglas Road – general improvements.
- Claremont Court / Finglas Road - general improvements.
- Prospect Way - general improvements and segregated crossing facilities for cyclists.

Provision for Buses

7.60. Prior to the examination of the merits of the proposed scheme in terms of bus infrastructure provision. I considered it necessary for the benefit of the Board, to clearly describe the features and bus infrastructure proposed.

7.61. Three types of bus stop are proposed along the route as follows:

- **Island Bus Stops** – bus stops whereby cycle lanes pass behind the bus stop separating the bus stop area from the footpath. To prevent conflict with pedestrians, pedestrian priority crossings accompanied by on-call signals will be provided, with narrowing of the cycle track from 2.0m to 1.5m to prevent cyclists overtaking through the bus stop. (see image 4.16 & 4.17 Chapter 4 of the EIAR)
- **Shared Bus Stop Landing Zone** - Where space constraints do not allow for an island bus stop, an option consisting of a shared bus stop landing zone is proposed. It is designed to reduce conflict between cyclists and stopping buses by ramping cyclists up to footpath level where they continue through the stop. The cycle track will also be narrowed when level to the footpath and tactile paving provided to prevent pedestrian/cyclist conflict. (See image 4.18 as above).
- **Layby Bus Stop –** Bus stops which are indented off the bus lane allowing other buses to pass. These are used for buses with longer dwell times**.** A Layby bus stop is proposed at one location on the Proposed Scheme, at Marino Crescent. This will allow for unimpeded traffic flow at this location. (see image 4.19 as above).
- **In line Bus Stop -** Where there are no cycle tracks provided, Inline Bus Stops will be used, where the users departing the bus will exit straight onto the footway. Inline Bus Stops are proposed to be retained only on the southern section of the Proposed Scheme through Phibsborough, where a separate cycle route will be provided, from Cross Guns Bridge on the Royal Canal at the northern end, along R108 Phibsborough Road to R135 Western Way, and at one location on R132 Church Street.

7.62. **Bus priority measures** can be achieved by – dedicated lanes, bringing bus lane to junction stop and this means in some circumstances that left-turning traffic cannot use the bus lane at junctions and instead will be provided with a dedicated left-turn traffic signal phase for the turn movement off the general traffic lane or will be provided with a separate left-turning lane.

7.63. **Signal Controlled Priority** - An alternative measure for achieving bus priority at locations where the provision of bus lanes is not possible is the use of Signal Control Priority (SCP). SCP facilitates bus priority by using traffic signals to give buses priority ahead of general traffic on sections of a route with significant physical constraints or pinch-points impacting on the provision of a bus lane. It works through the use of traffic signal controls (typically at junctions) where the bus lane and general traffic lane must merge ahead and share the road space for a short distance until the bus lane recommences downstream. The general traffic will be stopped at the signal to allow the bus pass through the narrow section first.

7.64. There are a number of locations along the route whereby SCP will be required, which are outlined within Section 4.6.4.2 of the EIAR.

7.65. **Bus Gates** - A Bus Gate is a sign-posted short length of stand-alone bus lane. This short length of road is restricted exclusively to buses, taxis, cyclists and emergency vehicles. It facilitates bus priority by removing general through-traffic along the overall road where the Bus Gate is located. General traffic is directed by signage to divert towards other roads before it arrives at the Bus Gate. Bus Gates will be in place for specified hours during the day. One Bus Gate is proposed on the R108 St. Mobhi Road on the Ballymun section of the proposed scheme. This Bus Gate will restrict northbound through-traffic at the junction of R108 St. Mobhi Road and R102 Griffith Avenue.

Concerns raised in relation to Bus infrastructure and stop locations

7.66. It is clear from the submissions received that there are a number of concerns in relation to bus infrastructure, such as accessibility of bus stops for the visually and mobility impaired, wheelchair uses and others with various disabilities. Conflict between cyclist and pedestrians at bus stops is also raised as a concern as is the potential for antisocial behaviour at bus shelters and the potential for impacts to accessibility of entrances.

7.67. In relation to the accessibility of bus stops for the mobility impaired I note that the applicant states that bus stops have been designed in an accessible manner for this group. The applicant contends within the EIAR that A Disability Audit of the existing environment and proposed draft preliminary design for the corridor was undertaken.

7.68. The Audit provided a description of the key accessibility features and potential barriers to disabled people based on the Universal Design standards of good practice. Examples of design solutions for the mobility impaired is the use of 60mm set down kerbs which identify a change in pavement use and is legible to guide dogs. The use of bus islands and including signal call button for crossing of cycle tracks will manage interactions with cyclists and pedestrians. I note that the applicant has engaged in consultation with Irish disability groups and has incorporated their advice within the design of the scheme, further evidence of this will be discussed in relation to junction design hereunder.

7.69. Bus islands are considered to 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 applicant states that 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. A 1 in 1.5 typical cycle track deflection is implemented on the approach to the island to reduce speeds for cyclists on approach to the controlled pedestrian crossing point on the island. To address the potential pedestrian/cyclist conflict, a pedestrian priority crossing point is provided for pedestrians accessing the bus stop island area. At these locations a 'nested Pelican' sequence similar to what has been provided on the Grand Canal Cycle Route will be introduced so that visually impaired or partially sighted pedestrians may call for a fixed green signal when necessary and the cycle signal will change to red.

7.70. In addition to the foregoing 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.

7.71. Having reviewed the detailed design of the proposed island bus stop and the concerns raised within the submissions, I am satisfied that the applicant has had due regard to the requirements of the mobility impaired and has designed this infrastructure accordingly to meet the needs of not only the mobility impaired but also the visually impaired.

7.72. I note that there are no submissions from representative groups for either the visually impaired or mobility impaired to the scheme, and I further note that extensive consultations with such groups has formed part of the design process for the scheme.

7.73. Dublin City Council within their submission also refer to the potential conflict between cyclists and pedestrians at bus stops and suggest that the scheme includes measures to slow cyclists down. Measures in this regard in relation to island bus stops has been adequately dealt with above. In relation to other bus stop types such as Shared Bus Stop Landing Zone, I note that the applicant proposes to narrow cycle lanes to 1 metre and to raise the cycle lane by a 1:20 gradient to the same level as the footpath on approach to the stop. Tactile paving will be used at these locations to differentiate between uses.

7.74. It is important to note at this juncture that the proposed cycle lane width reductions at these locations whilst below that required within DMURS have been adequately justified in the interest of pedestrian safety. I note DCC raise concerns in relation to the size of the bus island at Lindsay Road and consider it to be too small. In a general sense it is reasonable to expect that there will be instances whereby the optimal design cannot be achieved given that the proposed scheme is to be retrofitted into an existing urban fabric. The applicant within the documentation provides adequate justification for such reductions and has responded to these specific concerns within their response to the submissions as summarised above. Based on the information submitted and the context of the site I am satisfied that both the reduction in cycle lane width with behind the bus island and the provision of a smaller bus island at Lindsay Road are acceptable and adequately justified in the context of the overall scheme.

Access impacts

7.75. In relation to concerns raised in relation to bus stops and shelters impacting accessibility of existing entrances, I note that the applicant has responded to such concerns outlining the rationale for the selection of bus stops which is contained within Appendix H of the Preliminary Design Report, within the bus stop review report which based on best practice principles and required a distance of c. 250 metres between urban bus stops. In relation to bus stop no. 39, which is the subject of a specific submission, this review identified a need to move the said bus stop to a more central location. In response to concerns raised by third parties the applicant clarifies that the

proposed bus stop will be a slim structure that will not impede visibility into and out of the adjacent properties at no's 10 & 12 St. Mobhi Road. In addition, and in response to concerns raised, the proposed cycle track will not impact the ability of residents to reverse into their driveways at this location either and there is sufficient space for a bus to stop between both entrances without impacting accessibility to these properties.

7.76. Based on the foregoing I am satisfied that the revised location is acceptable in this instance.

Glasnevin Hill bus stop

7.77. Changes to public realm in Glasnevin at the junction with Botanic Avenue towards Glasnevin Hill will improve sight visibility of drivers and the bus stop at this location and in response to concerns raised I am satisfied that the proposed alterations at this location are appropriate and will be effective in this regard and will provide for a more accessible bus stop with a shorter crossing.

DCU Bus Stop

7.78. Concerns have been raised in relation to the position of Bus Stop no. 37 which is to be moved slightly further south and a new island bus stop constructed. Concerns relate to existing antisocial behaviour at this location. This bus stop has been identified as one of the more important stops as it serves DCU, the new proposed bus stop at this location will permit a free flow for cyclists which will pass behind the island stop and pedestrians on the footpath which will reduce current congestion and inaccessibility at peak times on the footpath at this location. The provision of a bus stop at this location is essential to service the university and whilst I note the concerns of third parties in this regard, I am satisfied that the new proposal will provide a signficantly improved arrangement for bus users and pedestrians at this location. Antisocial behaviour is not anticipated to increase as a result of relocating this bus stop.

Bus Gate St. Mobhi Road

7.79. I note from the submissions received that there is both support and concerns in relation to the proposed bus gate at St. Mobhi Road. Support for the proposed bus gate relates to the retention of trees along St. Mobhi Road and the improved bus service reliability.

7.80. Concerns relate to the enforcement of the bus gate, an increase in congestion and the diversion of traffic onto adjoining roads such as Botanic Rd, Glasnevin Hill, Old Finglas

Rd, Cremore villas and Griffith Avenue. It is also stated within the submissions that the proposed bus gate will result in an increase in pollution and congestion within these areas and the delaying of other bus services. Concerns are also raised in relation to the routing of diverted traffic from St. Mobhi Road past existing schools and the potential for impacts to arise in relation to increased traffic volumes at these schools. Third parties contend that the impacts on the routes that will accommodate the diverted traffic have not been considered within the EIAR.

7.81. I refer the Board to the EIAR section of this report hereunder in which all traffic impacts including those which relate to routes outside of the application boundaries and those which will accommodate diverted traffic are examined in detail. The applicant has responded to concerns raised by third parties in this regard and refers to the traffic assessment of EIAR in which it is outlined that there will be a reduction in traffic volumes heading to and from the city.

7.82. In summary, it is anticipated that there will be a 36% reduction in car passengers towards the city centre in the morning peak hour and a corresponding increase of 34% bus passengers and a 17% increase in walking and cycling. Impacts on surrounding roads are therefore expected to be positive, with the exception of Cremore Villas and Ballygall Rd whereby it is acknowledged by the applicant that there will be an increase of 266 vehicles, such increases are not considered to be significant within the context of the EIAR and I am satisfied based on the information submitted that these roads can adequately cater for the additional traffic and given that traffic is to reduce in most instances I am satisfied that there is no requirement to upgrade such routes.

7.83. In terms of St. Canices Rd or St. Pappin Rd modelling suggests that vehicles will not proceed to these locations and will divert earlier in the route thus resulting in no change to these routes. I am satisfied that the applicant has robustly examined the potential for impacts to arise in relation to the surrounding road network and that such changes will not give rise to any significant effects.

7.84. It is stated by the applicant that the proposed bus gate is necessary to ensure that a reliable and faster bus service can be achieved over a 1km section where bus lanes cannot be provided. A number of alternative routes outside of those referred to above have also been considered within the documentation submitted and the diversion of traffic onto these routes will further dilute the volume of traffic expected on the above

routes. Thus, whilst I acknowledge that there will be additional traffic on Cremore Villas and Ballygall road these roads are wide good quality and easily accessible routes that are well connected to other substantial routes within the area. The additional vehicles can therefore be adequately accommodated along these routes and I am satisfied that the applicant has provided a clear justification and rational for the proposed infrastructure and has adequately addressed the concerns of third parties within the response to submissions.

7.85. As mentioned above, based on the information provided within the application I am satisfied that the applicant has adequately and robustly considered the potential for impacts to arise on roads outside of the scheme. Furthermore, I consider it is reasonable to expect a reduction in general traffic as a result of the provision of a high frequency reliable bus service along the route which can be conveniently accessed by residents in the surrounding area, and which provides a more efficient and attractive mode of travel to the private car.

7.86. Having regard to the foregoing, I am also satisfied that additional traffic will not conflict with the safe operation of schools in the vicinity, as raised within a number of third-party submissions. It is important to note that the bus gate will only be operational in the evening times from 4pm to 8pm which is outside of school peak times. It is also clear from the information provided that less traffic is expected on many routes and as such the general traffic environment will improve for schools in the area.

7.87. Specific concerns have been raised by Our Lady of Victories School relating to staff and student safety and the routing of additional buses past the school as well as the disruption to students during construction. Traffic impacts have been considered above and are not considered to be significant and I am therefore satisfied that the proposed development would not pose a risk to the safety of students or staff, given that the school is accessible by foot via a segregated footpath and other multimodal means including, bicycle, bus and car. In addition, the proposed bus stop outside of this school is an island bus stop which will reduce dwell times on the footpath and any resultant pedestrian congestion at this location.

7.88. In response to concerns raised in relation to disruption to school students as a result of construction, the applicant has stated that works will be carried out during school

holidays to avoid such impacts from arising. This is reasonable and will also reduce traffic impacts within the surrounding area.

Provision for cyclists

7.89. One of the objectives for the Proposed Scheme is to enhance the potential for cycling by providing safe infrastructure, segregated from general traffic wherever practicable. The Proposed Scheme is 10.9km long (21.8km in the two directions) and includes approximately 20.2km of segregated cycle tracks compared with an existing provision of 7.5km of cycle tracks, and 5.5km of unsegregated cycle lane.

7.90. Segregated cycle tracks are to be provided along approximately 20.2km of the Proposed Scheme. At-grade cycle tracks will be provided as an alternative at locations whereby a no dig technique is required to protect trees. Slip kerbs will delineate cycle tracks in such instances.

7.91. As mentioned above at locations where roadway widths cannot accommodate cyclists alternative cycle route are proposed along quiet streets. One such route will be accommodated along the Royal Canal Bank for 1.1km in Phibsborough, with a further link southward for 0.7km between Coleraine Street and R148 Ormond Quay (running through the Markets Area). There will be a new link provided under R101 North Circular Road to provide a connection between the two parts of Royal Canal Bank at the location of a former canal bridge that was infilled.

7.92. For the benefit of the Board Quiet Streets are called so due to the low volume of only local general traffic users travelling at low speed and are deemed suitable and safe 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.

7.93. In relation to the design of the proposed cycle lanes, I note that it is proposed to provide lane widths of 2 metres for the majority of the proposed scheme. I note from the National Cycle Manual that a lane width of 2 metres allows for overtaking within cycle lanes and is the most appropriate minimum width for commuter routes. Concerns are raised within the submissions regarding the width of cycle lanes. It is suggested that all lanes should be 2/2.25 metres in width and that green buffers should be provided between the bus lane and the cycle track.

7.94. Whilst it is proposed to provide cycle lanes of 2 metres wide for the majority of the scheme, the applicant contends that the proposed scheme is being delivered in a constrained urban environment 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. As previously mentioned, cycle lane widths will also be reduced on approach to bus stops in order to reduce cyclist speeds at these locations. At such locations cycle lanes will reduce to 1.5 metres on approach to Island Bus Stops and 1 metre at Shared Landing zone bus stops.

7.95. 1 metre is the minimum width achievable for a single cyclist. Such reductions are necessary to adequately reduce cycle speeds in order to protect pedestrians particularly those with mobility or visibility impairments. I am satisfied based on the foregoing that the applicant has adequately demonstrated a justified need for the reductions in widths proposed and note that the overall scheme provisions are a significant improvement in cycle infrastructure.

7.96. With regard to the provision of green buffers I note the applicant's response in which it is stated that the proposed scheme provides additional measures including continuous kerb segregated cycle tracks, traffic calming measures and lower speed limits throughout the Proposed Scheme. Notwithstanding, the NTA recognises the benefits green buffers can bring and have introduced these elements at various sections in the Proposed Scheme where reasonably practicable to do so.

7.97. In relation to two way cycle lanes I note DCC concerns in this regard and note that the NTA have provided such facilities to facilitate safe access to sports and school buildings at locations along the route. I further note DCC concerns in relation to the shared surface at Whitworth Road as pedestrians and cyclists will access the proposed bridge and land at Whitworth Road in the same space before proceeding onto segregated lanes. This can not be avoided and it is reasonable to have shared spaces at locations where the provision of a separate bridge and segregation would not be feasible.

7.98. Given the nature of the scheme and the location and traffic speeds I consider the provision of a segregated cycle way as described will be a significant improvement over the current situation. The proposed development will provide a safe facility for

cyclists of all abilities to utilise, and will undoubtedly increase the modal share in favour of cycling. As mentioned above and in response to submissions, it is reasonable to expect that it will not be possible to retrofit the optimal infrastructure design without considerable impact to existing properties at locations whereby the road width is narrow. I am satisfied that the applicant has adequately justified such reductions in design widths and consider the proposed approach which includes the provision of alternative cycle routes via quiet streets to be acceptable and a proportionate design response to the constraints that the city and built environment give rise to. The Board should note that all deviations from design standards are outlined in Deviations / Departures / Relaxation from Standards Report contained within Appendix C of the EIAR. The majority of reduced standards relate to the retention of trees or provision of a wider footpath. Whilst I note submission in relation to the lack of cycle lanes in locations such as Phibsborough, as mentioned above I am satisfied that the applicant has provided the best quality cycle infrastructure in accordance with the requirements of DMURS.

Junction Design for cyclist

7.99. Concerns are also raised within the submissions received in relation to the various junction designs proposed by the applicant. It is suggested within the submissions received that the Dutch style junction would be a preferable design to be implemented within the proposed scheme. The third parties are concerned that junction designs as proposed have the potential to create conflict with cyclists and lead to collisions with both pedestrians and vehicles.

7.100. As mentioned above the applicants have prepared a Junction Design Report which is contained in Appendix A6.3 in which each design approach is outlined, in addition typical junction designs are also fully outlined and described within the project guidance document referred to as the PDGB. The applicant contends that due to the inherently complex nature of mixed mode movements at junctions, the provision for cyclists at junctions is a critical factor in managing conflict and providing safe junctions for all road users.

7.101. It is important to note at the outset that the applicant clearly states that both the Dutch Design Guide ‘Ontwerpwijzer Fietsverkeer’ and the National Cycle Manual have been considered and have informed the design principles for the junctions proposed.

7.102. Given that no two junctions are the same within the proposed scheme the applicant contends that while layouts differ in terms of lanes, signals and crossings, the principles of safety and functionality contained within the NCM and DMURS are integral to each junction layout.

7.103. Four main junction layout designs are outlined within the PDGB. Each layout responds to constraints in terms of space, volume of turning vehicle traffic etc. For the benefit of the Board, and in the interest of clarity I will describe each of the proposed junction types hereunder. In addition, the Junction Design Report contained in Appendix L outlines the design for each junction along the scheme and the justification for same.

Junction Type 1

7.104. These junctions have dedicated bus lane, vehicle lane and cycle lane, no left turning lane is provided for general traffic. (see section 7.4.1 of PDGB for illustration)

7.105. To be used when volume of left-turning vehicles is greater than 100 PCUs (Passenger Car Unit) per hour, in an urban setting where no space is available for a dedicated left-turning lane/pocket. In this scenario the mainline cyclists proceed with the bus phases. The bus lane then gets red, allowing the general traffic lane to proceed. Cyclists can continue with general traffic if volumes are between 100-150PCUs, with left turners controlled by a flashing amber. If volumes are in excess of 150 PCUs per hour then the cyclists are also held on red whilst the general traffic proceeds on green. Cyclists are separated from traffic at corners of junctions by kerbs. This will ensure long vehicle take a wide turn and not collide with left turning cyclists. These junctions will be dominant in urban locations.

Junction Type 2

7.106. These junctions will have a yellow box which crosses the bus lane approximately 30 metres from the stop line to allow left turning vehicles to enter a separate left turning lane. In this instance left turning cyclists are held and mainline cyclists proceed at the same time as buses. If volumes are less than 150PCUs mainline cyclists can proceed in tandem with left turning cyclists. Left turning cyclists will also be permitted to continue whilst side road traffic is moving but mainline cyclists will be held on red during these movements.

7.107. As with Junction type 1 cyclists from side road can proceed with mainline traffic and left turning cyclists will see a flashing amber light and get an early start to general traffic

turning in the same direction. In the event that turning traffic from the side arms exceeds 150PCUs per hour the cyclist phase can be separated from the traffic phase.

Junction Type 3

7.108. These junctions terminate the bus lanes a short distance from the junction (15-20 metres) to allow left turning general traffic move into the bus lane to turn left. Bus lanes commence directly after the junction on the opposite side. In this scenario mainline traffic including left turning traffic and buses proceed together but before they do mainline cyclists are given an 'early start' of approximately 5 seconds (minimum of 3 seconds) to minimise any conflict with left turners. When this early start is complete, the mainline cyclists can still proceed, assuming turning volumes are less than 150 PCUs per hour. Left-turners from the left-turn pocket are given a flashing amber arrow.

7.109. Bus lanes will be physically protected on the approach to Junction Type 3 which will ensure the performance of the bus lane isn't compromised by the left turners. Such protection measures will not impede residential entrances.

7.110. As with Junction Type 1 and 2, cyclists from the side roads can proceed with general traffic from the same arms, and the left turners from the side arms will be controlled by a flashing amber arrow and cyclists should receive an early start. As with the mainline, there may be circumstances where turning traffic from the side arms exceeds 150 PCUs per hour, in which case the cyclist phase from the side arm can be separated from the turning traffic phase.

Junction Type 4

7.111. The main difference with this junction is that the pedestrian crossing has two signalised crossings, one to cross the cycle lane and one to cross the junction. Similar to junction 3 the 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.

7.112. In this instance, mainline buses and left turners from the mainline proceed together. Depending on the prevailing site conditions, mainline cyclists can proceed with left-turners from the mainline (who are controlled with a flashing amber arrow) or cyclists can be held on red until it's time to share a full pedestrian 'wrap around' stage where all vehicular traffic is held and the green man is activated across all arms of the junction.

7.113. Left turning cyclists can bypass the junction while giving way to pedestrians crossing as well as cyclists already on the orbital cycle track.

Toucan Crossing

7.114. A toucan crossing is a signalised crossing whereby cyclists and pedestrians can cross together. Access to Toucan crossings will be necessary in certain circumstances from the main cycle track, for example where protected junctions cannot be provided (due to spatial constraints) or at mid-block Toucan crossings. providing a waiting area for cyclists waiting to use the Toucan crossing which is out of the way of straight-ahead cyclists. Where minimum footpath widths don't allow for a separate waiting area to be provided.

7.115. Overall, the proposed junction designs will ensure that pedestrian and cyclists safety is a priority whilst ensuring the free flow of buses and traffic along the route.

7.116. As mentioned above a number of submissions raised concerns in relation to the junction design approach proposed by the NTA. It is queried as to why an international standard such as the Dutch style junction or the Cyclops junction has not been adopted. The applicant has responded to this issue and contends that no two junctions are the same along the route. The proposed junction designs achieve the core aim of the project which is to enhance the potential for cycling by providing safe infrastructure for cycling, segregated from general traffic wherever practicable.

7.117. It is stated by the applicant that given the scale of the proposed scheme across the Greater Dublin Area a consistent design approach was required which led to the development of the PDGB. The ambition of the PDGB was to take the benefits of the traditional junction layout from the National Cycle Manual and supplement this with a range of measures aimed at increasing protection for cyclists and reducing uncontrolled conflict with pedestrians. The Dutch Cycle Design Guide has informed the design development process for the proposed scheme.

7.118. The proposed junction design includes deflection of the cycle track at junctions to provide a protection kerb which aims to prevent collisions with general traffic. This kerb also provides for a tighter turning movement for left turning vehicles and forces them to slow down before making the turn. This 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 at weaving and merging lanes. The proposed junction

design will also prevent cyclists from crossing the centre of a junction to turn right, cyclists will be required to cross at the crossing points and therefore improve their safety at such locations.

7.119. In comparison to the Dutch style junction, I note that the proposed junction layouts of the scheme include measures to mitigate pedestrian-cyclist conflict. The applicant states in their response to the submissions that the 'Dutch-style' junction described in the submission 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 is reasonably practicable.

7.120. It is further contended that the 'Dutch Style' junctions can result in a reduced level of service for pedestrians, requiring multimovement in multi directional, non-continuous crossings for pedestrians. The intermediate landing zones of such junctions can require substantial sized holding area for pedestrians to wait before crossing the road, this can require a significant space for urban locations. In contrast junctions 1-3 consolidate this waiting area with the footpath which a more legible and functional use of the available space for all users with direct crossing facilities that align to the principles of DMURS. It is the applicant's contention that it is for the reasons outlined above that the 'Dutch style' junctions have not been adopted. It is also noted by the applicant that the Dutch Design Guide also contains multiple solutions for junctions and does not prescribe the same design for all locations.

7.121. I am satisfied that the applicant has adequately justified the design approach and it is clear from the layout of the different types of junctions that there will be a significant improvement in terms of safety and accessibility for both cyclists and pedestrians. In addition, having a consistent design approach throughout the city will provide legibility within the streetscape for all users that is currently absent. A clear consistent approach to street and junction layouts will encourage people to interact with the landscape in

the manner which is intended by the scheme. A recognisable junction layout removes uncertainty for users and can only improve safety in the longer term.

7.122. Having regard to the foregoing, I am satisfied that the proposed junction designs conform with the key sentiments of the National Cycle Manual and the requirements of DMURS in that the user hierarchy is pivotal to the design with pedestrians being served at the outset and cyclists followed by public transport. The proposed junctions along this route are restricted in widths and in many instances particularly along the Ballymun section of the route there is only one dedicated bus lane in one direction and there are instances whereby cyclists are not always protected by kerbs from main line traffic. As mentioned above this is as a result of space constraints. Overall, whilst I acknowledge that the proposed scheme does not proposed a completely dedicated and separate bus lane in both directions for its entirety and that cycle lanes are not at optimal widths or layouts for the entirety of the route however, I acknowledge and am satisfied that the proposed development will be a significant improvement over the current bus and cycle infrastructure and will provide for a more efficient and safe experience for public transport users and cyclists along the route.

7.123. I note from the DCC submission that concerns are raised in relation to the complexity of the Prospect way junction which at present is a complicated layout. I have reviewed the proposed junction layout and acknowledge that the applicant within the design of the junction proposes to prioritise buses over general traffic and whilst I acknowledge that the design approach is particularly complicated I am satisfied that it adheres to the hierarchy of users as required by DMURS and whilst not an optimal situation is an improvement over the current car dominated arrangement at this location.

Metro

7.124. The development of the Metro is acknowledged within the information submitted and is considered in terms of cumulative impacts within the transport section of the EIAR below. I note that there will be five stations along the route as follows:

- Northwood,
- Ballymun,
- Collins Avenue,
- Griffith Park and,

- Glasnevin (Phibsborough)

7.125. The applicant has considered the interaction with the proposed scheme (which has been raised within the third party submissions) with these station locations and I am satisfied that adequate provision for the tie into this scheme has been made within the proposed development. I note that the applicant states that the designs of the two projects have been coordinated in relation to surface features including bus stops, cycle track alignments and footpaths for access to the stations. There are other interfaces along the route such as at a tunnel access and fire ventilation building at Albert College Park for which traffic access will be provided for maintenance vehicles from R108 Ballymun Road. At R101 North Circular Road, in Phibsborough, the metro tunnel will be located at a depth of about 25m below ground and will pass underneath the foundations for the proposed bridge over the Royal Canal Bank cycle route. Based on the information submitted it is clear that the proposed scheme will tie into and compliment the proposed metro infrastructure.

Provision for Pedestrians

7.126. The proposed scheme provides segregated footpaths of 2 metres in width with the exceptions referred to the table 4.5 of the EIAR. Pedestrian crossings will be simplified and shortened through the removal of left-slip lanes, road narrowing where possible, and straight crossings without staggers in median islands that require further waiting by pedestrians. At many existing junctions, pedestrian crossings are not currently available on all arms which requires pedestrians to go around the long way and to cross the junction in stages. In the Proposed Scheme, additional pedestrian crossings will be provided at all arms for more convenience and directness. There are a number of junctions however whereby additional crossings are not provided for as the need was not apparent due to the small numbers of pedestrians.

7.127. The Proposed Scheme will increase the number of controlled pedestrian crossings from 111 to 137. Additionally, there will be an increase in the number of raised table crossings on side roads from 27 to 78. I note the improvements proposed and in the assessment of same I note the requirements of DMURS in relation to footpath widths and crossing design.

7.128. For the benefit of the Board the desired footpath width outlined in DMURS is 2 metres with a minimum of 1.8 metres. 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.

7.129. Pedestrian crossings are recommended to be provided to allow for a single, direct movement. To facilitate road users who cannot cross in a reasonable time, the desirable maximum crossing length without providing a refuge island is 19m. It is also recommended within DMURS that Build-outs should be used on approaches to junctions and pedestrian crossings in order to tighten corner radii, reinforce visibility splays and reduce crossing distances, this specification has been included within the junction designs outlined above, however it is acknowledged by the applicant that in some instances there is insufficient space to accommodate such build outs and some crossings extend to 21 metres without an island due to space constraints.

7.130. A number of issues have been raised within the submissions received in relation to pedestrian crossings. Issues relate to the provision of a new pedestrian crossing at Botanic Gardens, this crossing was not considered to be required by the applicant and as such should be raised with the council as a local matter. Issues also relate to paving materials. I note that a consistent approach is to be taken in relation to the proposed development and materials to be used. The Proposed Scheme will provide new stone street paving in the heart of Ballymun town centre that is of a higher quality than the existing concrete paving materials. This is consistent with the general proposal for paving of the highest quality along the proposed core bus corridors within the BusConnects network. Elsewhere along the route the paving will be of similar quality to the existing paving. This is a common approach to paving materials whereby village centres will be delineated and highlighted through the use of superior paving than that provided on approach roads.

7.131. I note that the applicant has clarified that the removal of the existing footbridge on Finglas road and Church Street will not occur and this bridge shall remain in place and will be supplemented by a new pedestrian crossing to the south of the bridge.

7.132. Further issues relate to changes to crossings relate to the left slip Luas turning lane at church street. The NTA have responded to this issue and state that this was reviewed with Transport Infrastructure Ireland. TII expressed a desire for the existing left-slip lane to be retained as there is Garda traffic use of Chancery Street, and the current road layout provides better resilience for the tram operations by segregation from this

traffic at the junction. The proposed scheme therefore provides a necessary improvement at this junction with a new pedestrian crossing of Church Street without affecting the existing arrangement for the tramway. This is an acceptable response to the issues raised by DCC and I am satisfied that the proposed development will adequately provide for pedestrians at this location. In relation to Prospect Way and Botanic Road crossing, I acknowledge as mentioned above that this is a complicated arrangement but am satisfied that the segregation of cyclists and pedestrians is acceptable in this instance and will reduce the potential for conflicts to arise.

7.133. Finally, I note that concerns are raised in relation to the provision of a pedestrian link adjacent to no. 117 North Road which will provide a link from North Road to a new bus stop on Finglas Road beside the existing footbridge just south of the roundabout at St. Margaret's Road. The third party is concerned that the proposed link will provide an access where there has previously been none and as such will give rise to antisocial behaviour.

7.134. I note in this regard that the improvement of pedestrian linkages to public transport is an integral objective of the proposed scheme and one which is supported by the DCC County Development Plan. I further note that the applicants have responded to the submission and state that the opening up of the currently enclosed area under the footbridge will bring increased pedestrian activity which should deter anti-social activity compared to the current situation. I am satisfied having carried out a site inspection at this location that the proposed connection is appropriate in this instance and will improve upon the current public circulation areas at the existing footbridge.

7.135. Overall, additional physical interventions are provided throughout the length of the core bus corridor, such as enhanced/additional pedestrian crossings, raised table side entry treatments, and enhanced separate cycling infrastructure, all infrastructure to be provided is generally in line with the requirements of DMURS and any deviations are adequately justified and considered to be acceptable.

Traffic calming

7.136. There are a number of traffic calming measures that have been implemented in the Proposed Scheme that will reduce speeds including improved junction layouts with reduced corner radii, narrow carriageway lane widths, raised table crossings on side roads and proposed speed limit reductions. The additional landscaping and enhanced

pedestrian/ cyclist priority measures along the Proposed Scheme will also lend themselves to the principles of self-regulating streets as set out in DMURS to encourage lower driving speeds. I am satisfied that the applicant has adequately illustrated the type and location of all such measures and consider the proposed measures necessary to the success of the proposed scheme.

Parking

7.137. Briefly I draw the Boards attention to the assessment of parking along the route which has been considered and examined in detail within the EIAR submitted and will in the interest of conciseness will not be repeated hereunder. This section of the report should therefore be read in conjunction with the EIAR section below. Nonetheless it is important to note at this juncture that parking in Ballymun Village will be provided to service the existing commercial units and in relation to a query from DCC about parking inside of the bus lane I note the applicant's response and photographic evidence of parking on the bus lane at these locations. The regularisation of parking at these locations will prevent the need to encroach onto the bus lane and therefore protect the reliability of the service.

Structures

7.138. It is proposed to construct a new bridge over the Royal Canal, widen the existing bridge at Lindsay Grove and provide an underpass under the North Circular Road. All of these elements have been examined in the context of environmental impacts with both the Appropriate Assessment and Environmental Impact Assessment sections of this report. In the interest of conciseness, I will not revisit these elements of the assessment and this section of the report should be read in conjunction with the aforementioned. However, it is important to note that these elements are essential to the scheme to provide of safe segregated cycle infrastructure. In the case of the under pass, I consider that this element of the proposal will provide for a significantly improved public realm at this location which is currently under used and a poor uninviting public access way. The proposed bridge over the Royal Canal will be visually acceptable and will provide a safe access across the canal to Whitworth Road whereby a signficantly enhanced public circulation space will be provided.

7.139. The provision of widened bridge at Lindsay Road will enable and facilitate the continued segregation of cyclists, traffic and pedestrians and will largely assimilate into the existing urban fabric without any significant visual impact.

7.140. Overall the aforementioned structures are necessary and acceptable in the context of the overall scheme and I note no significant objections have been made within the submissions received in relation to these structures.

Residential Amenity.

7.141. Concerns are raised within the submissions in relation to antisocial behaviour at bus stops. In addition, general concerns are raised in relation to noise and pollution disturbance from additional buses along the route, these issues have been addressed within the EIAR section of this report and no significant impacts are expected in relation to air or noise pollution. In relation to anti-social behaviour at bus stops, it is of note that bus stops are present along the entirety of the route and the provision of island bus stops at many locations will move bus users further away from properties thus reducing the impact of noise and other such behaviour. Given that bus stops are already present along the scheme I am satisfied that the proposal will not introduce a new form of development or behaviour experience along the proposed route.

Visual Impact

7.142. 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.

7.143. 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.

7.144. 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. I note comments within the DCC submission which refer to the legibility of plans in relation to landscaping and based on the information submitted I am satisfied that the applicant has provided sufficient detail to adequately assess the merits of the proposed landscaping along the proposed scheme route.

7.145. It is evident that the landscaping and public realm proposals intend to soften the existing hard landscape with the use of edge planting, additional trees, pocket gardens and green pockets at junctions. Overall, the proposals provide for a more inviting space designed to cater for an improved pedestrian flow and environment. I note CIE's submission in relation to the pocket garden and acknowledge the NTA response in which is it agreed to incorporate the pocket garden into the proposed scheme. Replanting of trees to be removed at locations such as Na Fianna GAA club and Constitutional Hill will be agreed with the relevant landowner and implemented accordingly. Should the Board be minded to grant permission such matters can be dealt with by way of condition.

7.146. As mentioned within the landscape section of the EIAR, the existing front boundaries of 4 properties are to be set back at Nos. 34, 36 and 38 Bengal Terrace; and Daneswell Place, the Board should note that no objections have been received from these owners and the proposed works will reinstate the front boundaries and as such will not result in any significant changes to the visual setting of these properties.

7.147. Having regard to the plans submitted, I am satisfied that the proposal will have a positive impact to 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.

Property devaluation concerns

7.148. Third parties are concerned that the proposed scheme will devalue their properties. In general I note the NTA's response to these contentions within the EIAR submitted with the planning application in which it is concluded 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, especially in the community centres along the corridors, 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.

Phibsborough Shopping Centre

7.149. It is proposed to acquire lands that are currently part of the existing car park at the front of the Phibsborough Shopping Centre to accommodate bus lanes in both directions and upgraded pedestrian facilities within the carriageway way directly opposite the car parking area. The acquisition will require the loss of 35 no. parking spaces and will also require the relocation of an access for HGV movements at the front boundary of the site. Objections have been received from both the shopping centre and Tesco who is the anchor tenant at the centre. The NTA responded to these submissions and have outlined that the lands are required due to the restricted road width at this location. Cycle lanes have been redirected along quiet streets to avoid this area given the lack of space available. I have reviewed the plans at this location in detail and note that the carriageway is significantly restricted in terms of width. The Board should note that the objectors have maintained their objections to the proposed works in a response to the NTA response to their submissions.

7.150. The third parties are concerned that the proposed loss of parking will impact the viability of both the shopping centre and Tesco store. Further to this the third parties are unclear as to whether the proposed arrangement would provide adequate circulation space and whether the revised access can accommodate delivery trucks within the site.

7.151. Given the restricted widths at this location there is no other option but to acquire the proposed lands, a narrowing of traffic lanes to reduce the quantum of lands at this location would not alleviate the loss of car parking to such a degree as to appease the objectors and would result in significant alterations to the scheme in terms of traffic flows and access into and out of the shopping centre.

7.152. Therefore, whilst I acknowledge the objectors concerns, I am satisfied that there is no other option at this location but to acquire the lands outlined in order to achieve the objectives of the proposed scheme. The loss of these lands will allow for a sustainable and active travel scheme which will benefit all residents in the area and the overall environment at this location and as such the impact to landowners is justified in the context of the common good.

Northwood Distribution (Tesco)

7.153. Concerns are also raised by Tesco in relation to the modification of the Northwood Avenue Junction which provides access for heavy goods vehicles (HGVs) to and from the Tesco Distribution Centre.

7.154. It is proposed to remove the left turn slip lane at this location to provide improved protection to cyclists and pedestrians at this location. The NTA in their response state that the proposed modifications will not affect HGVs as the roads at the junction are wide with multiple lanes and generous widths for large vehicles to turn as is demonstrated within the Autotrack Swepth path analysis which has been illustrated within Fig. 2-1-9 of the NTA response to submissions report. I am satisfied based on the information provided that the proposed junction modifications at this location will not impede the use of this access by HGVs and as such will not impact the current use of the site by Tesco.

7.155. In addition to the foregoing Tesco have also raised concerns in relation to the junction at Clearwater Shopping Centre in relation to a similar issue whereby the left slip lanes will be removed. The applicants have carried out a Swepth Path Analysis and the proposed road layout fits the swept-path of large lorries but avoids excessive road space that would encourage faster traffic movements. I am therefore satisfied that such modifications improve pedestrian and cycle safety in accordance with the requirements of DMURS and also retain unimpeded access for large vehicles to the site.

Other issues raised

7.156. I note DCC concerns in relation to the underpass proposed under the North Circular Road and the potential for antisocial behaviour to occur at this location. Whilst such facilities can be attractive to such behaviour, I note that many of the residents groups welcome this element of the scheme and I note that public lighting and the large number of pedestrians expected to use this area will provide passive surveillance of the area and by doing so improve the safety of the area also.

7.157. Access to NCBI will not be treated any different to other areas whereby visually impaired are safeguarded by the legal obligation for cyclists to proceed with care and to give priority to all pedestrians. I acknowledge the provision of a shared space at this location but these are not unique and are necessary in limited circumstances whereby

space is constrained. I note that the applicant will liaise further with DCC in relation to tactile paving at this location in the final design specification for this footpath surface.

7.158. Concerns are raised in relation to the movement of traffic at Griffith Avenue within the submissions received. The applicant has provided a detailed response to these queries as to how traffic will move and access various streets. I will not repeat this response and direct the board to pages 47 and 48 of the NTAs response to submissions document in this regard. Nonetheless I have reviewed the applicant's response and am satisfied that a detailed account of traffic movements which cater for traffic capacity in the area and based on the information provided within the traffic section of the EIAR will ensure that congestion is avoided in the surrounding road network of this junction.

7.159. With regard to the concerns raised in relation to the GDA Cycle Network Plan, I note that the applicant states the proposed development will match the stated ambition of the network plan and elements proposed within the scheme form part of larger sections of the GDA Cycle Network and will tie into the scheme when implemented. I am satisfied that the proposed scheme compliments the network plan and will deliver on the plans ambitions as well as elements of the physical network also.

7.160. In relation to the loss of green space at Claremount Lawns to facilitate the relocation of carparking at Glasnevin Cemetery I am satisfied that the small area measuring 0.1 hectares which is 5% of the existing green area at this location is not significant and is adequately justified given the national status and significant number of visitors to Glasnevin Cemetery on a daily basis which need to be adequately accommodated for by way of car and bus parking.

7.161. Traffic calming on Iona Road is not required given the limited traffic accessing this road. This is reasonable.

7.162. In relation to conflicts with housing development at Constitutional Hill, I note that the works at this location will not be for a significant duration, it is recommended that should the board be minded to grant permission that a condition is imposed that requests the applicant to consult with the landowner in this regard and agree timelines for the proposed works in order to avoid any conflict in the delivery of housing.

7.163. In relation to the labelling of plans and level of detail provided, I am satisfied that the applicant complied with their statutory obligations in this regard and the level of detail is adequate to facilitate a detailed examination of the proposed scheme.

7.164. I note in their submissions that both FCC and DCC planning authorities have included lists of recommended conditions. Where relevant to any of the above assessment these have been discussed previously and are also referred to within the EIAR assessment below. 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.

7.165. 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.

7.166. 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 spec 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.

Linkage to Arran Quay

7.167. Concerns are raised in relation to the termination of the service at Arran Quay, in that this location is not central to the city centre or safe. I note that there are a number of spine routes which are expected to link bus users with additional city centre bus services which will travel to other destinations and as such patrons will have to continue their journey onwards along the quays or to the south of the river Liffey. The redesign of the bus service will also ensure that buses do not terminate at the same location in the city centre which would lead to significant congestion at the one location.

The routes as proposed will provide for a circular service each looping around the dedicated spine route and supplemented by peripheral more local routes and city centre routes including other travel infrastructure such as the LUAS.

7.168. In terms of safety the route will terminate at a busy main road similar to other routes in the city which is well lit by street lighting and heavily trafficked by both pedestrians and general traffic. This is not uncommon for a city centre.

Navigation on Royal Canal

7.169. A submission has been received in relation to the Royal Canal and the height of the pedestrian bridge over the canal onto Whitworth Road. I note that the NTA has confirmed that the proposed bridge will not impede navigation on the canal.

No. 2 Ballymun

7.170. In relation to parking at no. 2 Ballymun the applicant has confirmed that no changes are proposed to parking at this location.

7.171. Interaction with the proposed Blanchardstown BusConnects will arise at the Monck Place and Phibsborough Junctions. Works proposed to these junctions as part of the Blanchardstown to City Centre Core Bus Corridor Scheme (which has the greater influence on traffic displacement) include the introduction of short one-way sections, kerbline realignment and uncontrolled raised crossings, along with landscaping and a cycle track at the Monck Place Junction along with the introduction of right-turn bans onto R108 Phibsborough Road. These works have been considered in terms of cumulative impacts within the EIAR assessment hereunder and have been found not be significant.

7.172. In relation to cycle signage, it is proposed to provide adequate signage along the route and in particular at Phibsborough where cyclists are permitted to utilise the bus lane.

Conclusion

7.173. Overall, it is clear that the proposed scheme has been designed in a manner that is compliant with the overriding government policy, guidelines and the Dublin City Development Plan 2022-2028 in relation to such infrastructure and the applicant has been mindful to provide detailed analysis of all aspects of the proposed scheme and appropriate justifications for the approaches taken. I am satisfied that the proposed scheme will provide a high quality, reliable, safe and aesthetically pleasing multimodal

transport corridor and will encourage a significant modal shift in favour of active and sustainable travel modes into and out of the city. Whilst I acknowledge all of the concerns raised by third parties I am satisfied that the applicant has provided clear, robust and detailed information in relation to the design and layout of the proposed scheme and has provided clear detailed and robust justifications for all aspects of the scheme and has clearly outlined how this scheme can contribute to the achievement of a low carbon society and economy through the sustainable movement of people into and out of the city. I am therefore satisfied that the proposed development is in accordance with the proper planning and sustainable development of the area.

7.174. It must be acknowledged that a significant number of issues have been raised which I have considered and endeavoured to examine throughout this report. It must also be acknowledged, as discussed throughout this report that there is significant difficulty in retrofitting sustainable and active travel infrastructure into a densely developed urban fabric and as a general comment it must be recognised and accepted that optimum design standards cannot always be met in such situations. Guidance such as DMURS accepts that such situations arise.

7.175. Therefore, in overall conclusion of this assessment I am satisfied that the proposed development whilst it does not provide optimal design specifications in all instances, does provide for signficantly improved public transport and active travel infrastructure. In addition to the foregoing and in the context of improvements in journey times, it is also important to acknowledge that whilst in some instances speed of journeys improve moderately, the improvements to public realm and the improved and enhanced experience of public transport and safety of active travel infrastructure is significant. The proposed scheme from a visual and circulation experience signficantly improves the general environment within and surrounding the scheme and will therefore provide a positive experience for residents and commuters in the area of the scheme. Such improvements are proven to be effective in the reduction in antisocial behaviour which has been the concern of many third parties along the route.

7.176. It is of further note that all issues have been considered and whilst not specifically referred to within this report are considered in the context of the scheme and appropriate conditions have been recommended where considered necessary.

8.0 Appropriate Assessment

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

Article 6(3) of the Habitats Directive

8.2. 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

8.3. The application is accompanied by an AA Screening report and an NIS (2020) 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.

8.4. 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.

8.5. A description of all baseline surveys is outlined within section 4.6 of the NIS. The following is a list of surveys undertaken:

8.6. Habitats, Flora and Fauna surveys (which included Otter), –were carried out in June and August 2018, August 2020, Kingfisher October 2020,

8.7. The desk study identified all hydrological crossing points within the footprint of the Proposed Scheme and identified one hydrological crossing point within the footprint of the Proposed Scheme which involved instream works, modifications to banks or significant disturbance. This site was located at the proposed Royal Canal pedestrian / cycle bridge crossing point (referred to as CBC0304AR001) and was surveyed by Triturus Environmental Ltd. in October and November 2020, aquatic surveys were carried out due to in stream works proposed.

8.8. A desk study was carried out to identify any potential suitable inland feeding and / or roosting sites for wintering birds located within or directly adjacent to the Proposed Scheme. This study identified one site along or adjacent to the Proposed Scheme with potential for wintering birds that would be subject to direct habitat loss. This was located at Home Farm Football Club pitch on R108 St. Mobhi Road (referred to as CBC0304WB001). 70 Winter bird field surveys were conducted by Scott Cawley Ltd. The site was surveyed during four visits between the months November 2020 and March 2021. The site was also surveyed over the 2021 / 2022 wintering bird season. Thirteen surveys of the site were conducted between October 2021 and March 2022.

8.9. 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.

8.10. 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.

8.11. There were five areas of non-native invasive plant species listed on the Third Schedule of the Birds and Habitats Regulations identified along or adjacent to the Proposed Scheme. Records within close proximity to the Proposed Scheme include giant hogweed *Heracleum mantegazzianum*, Japanese knotweed *Reynoutria japonica* and Himalayan balsam *Impatiens glandulifera* scattered along the banks of the Tolka across the Proposed Scheme, while Nuttall's waterweed *Elodea nuttallii*, and Canadian waterweed *E. canadensis* were recorded in the Royal Canal in the vicinity of the proposed pedestrian cycleway bridge. Several records of Brazilian giant-rhubarb *Gunnera manicata*, New Zealand pigmyweed *Crassula helmsii*, three-cornered garlic *Allium triquetrum*, Nuttall's waterweed, and water fern Azolla filiculoides were recorded within the grounds of the National Botanic Gardens adjacent the Proposed Scheme.

8.12. No records of any Annex II plant species were recorded within the footprint of the Proposed Scheme during field surveys.

8.13. No signs of otter, an Annex II species, were recorded during surveys within the footprint of the Proposed Scheme. Otter scat was recorded at one location during the 2022 surveys along the River Tolka at the R135 Finglas Road / Ballyboggan Road Junction, immediately adjacent to the Proposed Scheme. No signs of otter were recorded within 150m upstream and downstream of the proposed Royal Canal pedestrian / cycle bridge crossing point. Signs of otter were recorded further upstream and downstream of the Proposed Scheme along the River Tolka, but not along the Royal Canal at the crossing point for the proposed Royal Canal pedestrian / cycle bridge.

8.14. The desk study (Appendix II) found that kingfisher *Alcedo atthis*, an Annex I species, are known to occur within 1km of the Proposed Scheme and across the wider study area. In particular, a population of kingfisher are reported to be present along the River Tolka in the vicinity of Tolka Valley Park. There are no records of kingfisher on the Royal Canal, in the vicinity of the Proposed Scheme. No kingfisher were recorded within the footprint of the Proposed Scheme, during the multidisciplinary or habitat suitability assessment surveys.

8.15. The desk study returned records of three breeding gull species within 300m of the Proposed Scheme which may use inland amenity grassland feeding sites including black-headed gull *Chroicocephalus ridibundus*, herring gull *Larus argentatus*, and lesser black-backed gull *Larus fuscus*. There are no known inland feeding sites for light bellied Brent Geese within the footprint of the proposed scheme, a list of six known sites within 300 metres of the scheme is provided within the NIS.

8.16. Wintering bird surveys were carried out for the Proposed Scheme at one location, Home Farm Football Club pitch on R108 St. Mobhi Road (referred to as CBC0304WB001), between November 2020 and March 2021, and again between October 2021 and March 2022. Species recorded during the survey were: black-headed gull, herring gull and grey heron Ardea cinerea.

8.17. Transect CBC0304WB001 is characterised by a private recreational green space adjacent to R108 St. Mobhi Road. The ground is maintained through regular cutting by Home Farm Football Club. Grass cover was high across the survey period with a

low sward height. No disturbance was observed on the site as it was fenced off from public use, utilised solely by the Football Club. Heron was the only bird that was frequently observed on the football pitch and neighbouring treeline. Black-headed gull was only observed once using the football pitch. The records of wintering birds returned from the survey was not high. The lands through which the transect covered will not be directly impacted by the Proposed Scheme. Three additional known foraging sites located within 300m of the scheme are identified within section 5.1.3.4 of the NIS.

8.18. The Proposed Scheme will cross a total of four watercourses: the River Tolka, the Royal Canal, the Claremont Stream and the Bachelors Stream. In the northern section, the Proposed Scheme will terminate at St. Margaret's Road, in close proximity to the River Santry. In the southern section, the Proposed Scheme will terminate at R148 Arran Quay, adjacent to the Liffey Estuary Upper. The drainage system for the Proposed Scheme will discharge to two main surface water receptors, the Tolka_050 and Tolka_060, and Ringsend WwTP (which ultimately discharges to Liffey Estuary Lower, Dublin Bay, post-treatment).

8.19. 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.

8.20. **It is important to note that the proposed scheme does not overlap with any European site. The nearest European Site to the Proposed Scheme is South Dublin Bay and Tolka Estuary SPA, located 2.7km east of the Proposed Scheme.**

8.21. 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 Table 7 & 8.

8.22. Mitigation measures are presented from section 7.1.5 of the NIS onwards under each site heading and detailed in full in the Construction Management Plan (CMP). An assessment of potential in-combination effects is presented in Section 9 of the NIS.

8.23. **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.

8.24. 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 development on lands from Ballymun to the City Centre (the Ballymun Section) and from Finglas to Phibsborough (Finglas Section) I am satisfied that all possible European Sites that could in anyway be affected have been considered by the Applicant.

8.25. 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

8.26. 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).

8.27. 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 North West Irish Sea SPA which extends offshore along the coasts of counties Louth, Meath and Dublin, and is approximately 2,333km2 in area and is adjacent to and ecologically connected to several existing SPAs in this area which have been screened in by the applicant. I have included this site within my screening for Appropriate Assessment which brings the total number of sites to 18.

8.28. 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 the applicant has included sites at some remove from the proposed development site.

8.29. 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 European Sites for which the likelihood of significant effects cannot be ruled out (Applicant).

Potential impacts and zone of influence of effects	**European sites within Zone of Influence**
Habitat loss and Fragmentation 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 bird species.	**No** There are no European sites at risk of habitat loss impacts associated with the Proposed Scheme
Habitat degradation/ effects on QI/SCI species as a result of hydrological impacts: Habitats and species downstream of the Proposed Scheme and the associated surface water drainage discharge points, and downstream of offsite wastewater treatment plants	**Yes** There are European sites at risk of hydrological effects associated with the Proposed Scheme: 8.30. North Dublin Bay SAC, South Dublin Bay SAC, Howth Head SAC, Rockabill to Dalkey Island SAC, Lambay Island SAC, South Dublin Bay and River Tolka Estuary SPA, North Bull Island SPA, Howth Head Coast SPA, Malahide Estuary SPA, Baldoyle Bay SPA, Rogerstown Estuary SPA, Skerries Islands SPA, Lambay Island SPA, Ireland's Eye SPA, Dalkey Islands SPA, Rockabill SPA and The Murrough SPA and the North West Irish Sea SPA
Habitat degradation as a result of hydrogeological impacts:	**No** There are no European sites at risk of hydrogeological effects

Groundwater-dependant habitats, and the species those habitats support, in the local area that lie downgradient of the Proposed Scheme.	associated with the Proposed Scheme
Habitat degradation as a result of introducing/spreading non-native invasive species: Habitat areas within, adjacent to, and potentially downstream Sof the Proposed Scheme	**Yes** There are 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: North Dublin Bay SAC, South Dublin Bay SAC, North Bull Island SPA and South Dublin Bay and River Tolka Estuary SPA, North -West Irish Sea SPA.
Air quality impacts Potentially up to 200m from the Proposed Scheme boundary:	**No** There are no European sites at risk of air quality effects associated with the Proposed Scheme
Disturbance and displacement impacts: 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	**Yes** There are no European sites within the potential zone of influence of disturbance effects associated with the construction or operation of the Proposed Scheme. However, there are ex-situ inland feeding sites which are utilised by SCI wintering bird species within the potential disturbance ZoI of the Proposed Scheme for 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, and The Murrough SPA, North West Irish Sea SPA.

Screening Determination (recommendation)

8.31. 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

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

8.32. I also consider in addition to the above that there is potential to impact on the newly designated North West Irish Sea SPA.

8.33. Given the hydrological connections and proximity of the proposed works to ex-situ feeding sites associated with the Qualifying Interests of the European sites listed above and the potential relationship with all European sites within the zone of influence, and their conservation objectives, it is reasonable to conclude that there is a potential for impacts to arise in relation to habitat degradation and disturbance and

displacement. As screening is considered at pre-assessment stage, further analysis is required to determine the significance of such impacts and if appropriate, where any potential impacts are identified on the qualifying interests associated with natura 2000 sites, to apply any mitigation measures to exclude adverse effects. Therefore, North Dublin Bay SAC, South Dublin Bay SAC, Howth Head SAC, Howth Head Coast SPA, Rockabill to Dalkey Island SAC, Lambay Island SAC, North Bull Island SPA, South Dublin Bay and River Tolka Estuary SPA, Dalkey Islands SPA, Malahide Estuary SPA, Rockabill SPA, Baldoyle Bay SPA, Rogerstown Estuary SPA, Skerries Islands SPA, Ireland's Eye SPA, Lambay Island SPA, Murrough SPA and North West Irish Sea SPA, are brought forward for inclusion in the Stage 2 AA. It should be noted by the Board that the NIS submitted does not include Ireland's Eye SAC within the Stage 2 Appropriate Assessment, however this site is referred to within the Section 7.2.3 and within the heading of table 12 of the NIS. I consider this to be a typographical error and am satisfied that this site should not be considered within the Stage 2 Appropriate Assessment on the basis that it is signficantly removed from the proposed development works and any impacts to water quality would be significantly dispersed and diluted prior to meeting this SAC and as such would not result in any likely significant effects to this designated site.

Appropriate Assessment (recommendation)

8.34. 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.

8.35. 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:

8.36. 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,
- Howth Head Coast SPA,
- North Bull Island SPA,
- South Dublin Bay and River Tolka Estuary SPA,
- Dalkey Islands SPA,
- Malahide Estuary SPA,
- Rockabill SPA,
- Baldoyle Bay SPA,
- Rogerstown Estuary SPA,
- Skerries Islands SPA,
- Ireland's Eye SPA,
- Lambay Island SPA and the
- Murrough SPA.
- North West Irish Sea SPA,

8.37. 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.

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

8.39. Tables 2-8 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 in relation to habitat, community - extent/vegetation structure/distribution including fine sand to sandy mud with Pygospio elegans and Crangon crangon community complex; Fine sand with Spio martinensis community complex.	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 alone or cumulatively with other pollution sources, could affect the quality of the intertidal habitats and the fauna communities they support.	Detailed pollution control measures to protect water quality are outlined within section 7.1.5 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
Annual vegetation of drift lines	Restore the favourable conservation condition in relation to habitat - extent/structure/distribution/ composition. Maintain presence of sea rocket (Cakile maritima), sea sandwort (Honckenya peploides), prickly saltwort (Salsola kali) and oraches (Atriplex spp.)		
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.		receiving water environment. 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.
Atlantic salt meadows (Glauco-Puccinellietalia maritimae) **Mediterranean salt meadows (Juncetalia maritimi)**	To maintain the favourable conservation condition in relation to habitat, community - extent/vegetation structure of habitat & physical structure /distribution		
Embryonic shifting dunes **Shifting dunes along the shoreline with Ammophila arenaria (white dunes)** **Fixed coastal dunes with herbaceous vegetation (grey dunes)** **Humid dune slacks**	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 7.1.5 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.
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 all

watercourses 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	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 alone or cumulatively with other pollution sources, could affect the quality of the intertidal habitats and the fauna communities they support.	Detailed pollution control measures to protect water quality are outlined within section 7.1.5 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
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 Zostera dominated community and fine sands with Angulus tenuis		
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		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. 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.
		Spread of invasive 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 7.1.5 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.
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 watercourses 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 Howth Head SAC

Howth Head SAC [000202] **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**
Vegetated sea cliffs of the Atlantic and Baltic coasts	Maintain favourable conservation condition in relation to habitat length/distribution/structure and hydrological regime, vegetation structure: zonation transitional zones, natural processes etc, vegetation height/composition – negative indicator species to be below 5% and bracken less than 10% etc. Terrestrial habitats above the high tide line are not at risk of effects from water pollution in Dublin Bay	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 7.1.5 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. 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.
European dry heaths	Maintain favourable conservation condition in relation to habitat length/distribution/Ecosystem – maintain soil nutrient status/community diversity/vegetation composition-number of positive indicator species at monitoring stop at least 2. Vegetation percentage cover per species in line with that outlined in Objective.	None, the proposed development is not connected to this SCI	None required.

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 Howth Head 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 adjacent watercourses 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 Howth Head SAC

Table 5: 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 7.1.5 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
Harbour porpoise *Phocoena phocoena*	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.	

			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.

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 adjacent watercourses 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 6 AA Summary matrix for Lambay Island SAC

Lambay Island SAC [000204] **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		
Reefs	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 required.
Vegetated sea cliffs of the Atlantic and Baltic coast	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	
Halichoerus grypus (Grey Seal)	No restriction of species range by artificial barriers to site use; breeding and moult 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.	Pollution event could potentially affect the quality of the intertidal /marine habitats which support grey seal and harbour seal.	Detailed pollution control measures to protect water quality are outlined within section 7.1.5 and include but are not limited to: the use of silt fences, silt curtains, settlement lagoons and filter materials. Provision of exclusion zones
Phoca vitulina (Harbour Seal)	No restriction of species range by artificial barriers to site use; breeding and moult and resting haul-out sites maintained in natural	As Above	

	condition; and human activities should occur at levels that do not adversely affect the species at the site.		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. Detailed pollution control measures to protect water quality are outlined within section 7.1.5 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.

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 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 adjacent

watercourses 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 Lambay Island SAC.

Table 8: 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, North West Irish Sea SPA.

North Bull Island SPA [004006], Baldoyle Bay SPA [004016], Malahide Estuary SPA [004025] and Dalkey Islands SPA [004172], Howth Head Coast SPA [004113], South Dublin Bay and River Tolka Estuary SPA [004024], Rogerstown Estuary SPA [004015], Skerries Islands SPA [004122], Rockabill SPA [004014], Ireland's Eye SPA [004117], Lambay Island SPA [004069], North West Irish Sea SPA [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**
Long term pop trend stable or increasing 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.	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 the of intertidal/coastal habitats that support the special conservation interest bird	Detailed pollution control measures to protect water quality are outlined within section 7.1.5 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

	species of the SPA. This could potentially affect the use of habitat areas by birds and have long-term effects on the SPA populations. 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.	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. 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. See the mitigation measures described in Section 7.1.5 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,
Baldoyle Bay SPA [004016} Light-bellied Brent Goose, Shelduck, Ringed Plover, Golden Plover, Grey Plover, Bar-tailed Godwit		
Summary of Appropriate assessment		
Conservation Objectives **Targets and attributes** **(summary)**	**Potential adverse effects**	**Mitigation measures**
Long term pop trend stable or increasing No significant decrease in range, timing or intensity of use of areas by wintering waterbirds	In a worst case scenario, an accidental pollution event during construction or operation could affect surface water downstream in Dublin Bay, which SCI birds may utilise outside of their core SPA foraging areas. An accidental pollution event of a sufficient magnitude, either alone or cumulatively with other pollution sources, could potentially affect the quantity and quality of prey fish species and the quality the of intertidal / coastal habitats that support the special	As Above in relation to water quality protection.

	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.	
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	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 alone 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.	As Above in relation to water quality protection.
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	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 alone or cumulatively with other pollution sources, could potentially affect the quantity and quality of prey fish species and the quality the of intertidal/coastal habitats that	As above in relation to water quality. Section 7.1.5 of NIS.

	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.	
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.	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 alone or cumulatively with other pollution sources, could potentially affect the quality 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. 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	As Above in relation to protection of water quality. See the mitigation measures described in Section 7.1.5 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,

	have long-term effects on the SPA populations.	
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**
Long term pop trend stable or increasing No significant decrease in range, timing or intensity of use of areas	In a worst case scenario, an accidental pollution event during construction or operation could affect surface water downstream in Dublin Bay, which SCI birds may utilise outside of their core SPA foraging areas. An accidental pollution event of a sufficient magnitude, either alone or cumulatively with other pollution sources, could potentially affect the quantity and quality of prey fish species and the quality 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.	As Above in relation to protection of water quality.
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**
Long term pop trend stable or increasing	As above	As Above

No significant decrease in range, timing or intensity of use of areas 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		
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		
Summary of Appropriate Assessment		
Conservation Objectives **Targets and attributes** **(summary)**	**Potential adverse effects**	**Mitigation measures**
Long term pop trend stable or increasing No significant decrease in range, timing or intensity of use of areas	As Above	As Above
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 argentatu		
Summary of Appropriate Assessment		
Conservation Objectives **Targets and attributes** **(summary)**	**Potential adverse effects**	**Mitigation measures**
As Above	In a worst case scenario, an accidental pollution event during construction or operation could affect surface water downstream in Dublin Bay, which SCI birds may utilise outside of their core SPA foraging areas. An	As Above in relation to water quality protection.

	accidental pollution event of a sufficient magnitude, either alone or cumulatively with other pollution sources, could potentially affect the quantity and quality of prey fish species and the quality 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	
Lambay Island SPA [004069] Fulmar Fulmarus glacialis, Cormorant Phalacrocorax carbo, Shag Phalacrocorax aristotelis, Greylag Goose Anser answer, 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**
As Above	In a worst case scenario, an accidental pollution event during construction or operation could affect surface water downstream in Dublin Bay, which SCI birds may utilise outside of their core SPA foraging areas. An accidental pollution event of a sufficient magnitude, either alone or cumulatively with other pollution sources, could potentially affect the quantity and quality of prey fish species and the quality 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	As Above in relation to protection of water quality.
The Murrough 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, Wetlands		

Conservation Objectives Targets and attributes (summary)	Potential adverse effects	Mitigation measures
To maintain or restore the favourable conservation condition of the wetland habitat at The Murrough SPA as a resource for the regularly-occurring migratory waterbirds that utilise it.	As Above	As Above
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**
Long term pop trend stable or increasing No significant decrease in range, timing or intensity of use of areas 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.	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 quantity and quality of prey fish species and the quality and suitability of roosting sites within the SPA. 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 signficantly effects.	As Above in relation to water quality protection.
North West Irish Sea SPA (004236) Common Scoter (Melanitta nigra), Red-throated Diver (Gavia stellata), Great Northern Diver (Gavia immer), Fulmar (Fulmarus glacialis), Manx Shearwater (Puffinus puffinus), Shag (Phalacrocorax aristotelis), Cormorant (Phalacrocorax carbo), Little Gull (Larus minutus), Kittiwake (Rissa tridactyla), Black-headed Gull (Chroicocephalus ridibundus), Common Gull (Larus canus), Lesser Black-backed Gull (Larus fuscus), Herring Gull (Larus argentatus), Great Black-backed Gull (Larus marinus), Little Tern (Sterna albifrons), Roseate Tern (Sterna dougallii), Common Tern (Sterna hirundo), Arctic Tern (Sterna paradisaea), Puffin (Fratercula arctica), Razorbill (Alca torda), Guillemot (Uria aalge).		
Conservation Objectives **Targets and attributes**	**Potential adverse effects**	**Mitigation measures**

(summary)		
In the absence of any site specific conservation objectives it is reasonable to apply those outlined above pertaining to other sites as species are listed within these sites are the same as those listed above.	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 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. 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.	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. 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. 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. See the mitigation measures described in Section 7.1.4.2 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,
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 that are remote from the proposed development site 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 adjacent watercourses 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

8.40. 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.

8.41. Additional potential impacts relate to disturbance arising from noise and vibration during construction works and the operational phase of the development. I have considered the potential for impacts to arise in relation to air quality impacts and dust deposition, however there are no Natura 2000 designated sites within the zone of influence for such impacts to occur and I am satisfied that impacts arising from air quality and dust deposition do not require any further assessment.

8.42. It is important to reiterate 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.

8.43. I will examine the foregoing impacts hereunder, the Board should note that designated sites will be considered and grouped under each relevant heading in order to prevent repetition. Potential impacts to water quality relate to all sites listed above.

<u>Noise & Vibration Disturbance</u>

8.44. 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 effects due to the distance of Natura 2000 sites and known ex-situ sites from the proposed works. It is acknowledged within the NIS that there are a number of open amenity grasslands which would be suitable for foraging by over wintering birds which are outlined below, such lands are examined in the context of each relevant SPA and the QIs within the NIS.

- Glasnevin / St. Vincent's Primary School (major importance), approximately 82m from the Proposed Scheme;
- Finglas / Erin's Isle GAA (major importance), approximately 85m from the Proposed Scheme
- Glasnevin / DCU Sports Grounds (major importance), approximately 170m from the Proposed Scheme;
- Finglas / Dunsink Road (high importance), approximately 207m from the Proposed Scheme;
- Tolka Valley Park (moderate importance), approximately 262m from the Proposed Scheme; and
- Finglas / Farnham Drive Park (high importance) approximately 269m from the Proposed Scheme.

8.45. The zone of influence in relation to noise impacts (during the construction phase) is stated to be within 300m of the proposed works. As aforementioned, there are no Natura 2000 sites within this radius. Impacts would therefore relate solely to ex-situ effects in relation to foraging birds. Significant adverse effects are not considered likely due to the availability of suitable foraging lands within the vicinity (and the wider area away from the proposed construction works) and the temporary nature of the proposed works in such an urbanised setting.

8.46. Effects arising from the construction would not be expected beyond 150m for mammals such as otter. I note that while the Proposed Scheme is within the potential foraging range of male otter, the Proposed Scheme is located in a different catchment to the Wicklow Mountains SAC which is the nearest designated SAC to the proposed scheme for which Otter is a QI, therefore, any otters present in the vicinity of the Proposed Scheme are not associated with the QI populations of any European site.

As such no disturbance impacts arising from noise and vibration are considered likely. No otters were recorded within the boundary of the proposed scheme but scat was recorded within 150m of the proposed works and within the Royal Canal. The Board should note that impacts to Otters not associated with a Natura 2000 designated site are considered within the EIAR of this report.

Habitat loss and fragmentation

8.47. Home Farm Football Club on R108 St. Mobhi Road is identified as being utilised for foraging by over wintering birds, this site is adjacent to the proposed scheme. This site will not be directly impacted by the proposed works and there will not be any loss of sites suitable to support breeding gull and wintering bird species. Therefore, there is no potential for impacts on SCI species associated with SPAs to occur as a result of habitat loss / fragmentation.

Habitat degradation/effects on QI/SCI species as a result of the spread of Invasive Plant Species.

8.48. The applicant has recorded five areas of four non-native invasive plant species listed on the Third Schedule of the Birds and Habitats Regulations, within, or in close proximity to, the Proposed Scheme: Giant hogweed, Himalayan balsam, Japanese knotweed and Nuttall's waterweed.

8.49. During construction and / or routine maintenance / management work during the operational phase of the development, these species could potentially spread or be introduced to terrestrial habitats located within downstream European sites via surface water features. As stated by the applicant, the introduction and/or spread of these invasive species to downstream European sites could potentially result in the degradation of existing habitats present, in particular coastal habitats which are 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. This in turn could undermine the conservation objectives of these European sites.

8.50. The Board should note as outlined above that the Proposed Scheme is hydrologically connected to the River Tolka, Royal Canal, Liffey Estuary Upper and River Santry , all of which flow into Dublin Bay. Therefore, there is potential for the Proposed Scheme to undermine the conservation objectives of South Dublin Bay and River Tolka Estuary

SPA, North Bull Island SPA, North Dublin Bay SAC and South Dublin Bay SAC as a result of invasive species spread.

Habitat degradation/effects on QI/SCI species as a result of hydrological impacts

8.51. 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.

8.52. The Proposed Scheme is hydrologically connected to the River Tolka, Royal Canal, Liffey Estuary Upper and River Santry, all of which flow into Dublin Bay. In addition, the Proposed Scheme is hydrologically connected to Dublin Bay as a result of surface waters from the footprint of the Proposed Scheme which will join the public sewer and will be treated at the Irish Water Ringsend WwTP prior to subsequent discharge to Dublin Bay via the Liffey Estuary Lower.

8.53. It is stated by the applicant that whilst it is unlikely to occur, this 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 Dublin Bay SAC, South Dublin Bay SAC, Howth Head SAC, Howth Head Coast SPA, Rockabill to Dalkey Island SAC, Lambay Island SAC, North Bull Island SPA, South Dublin Bay and River Tolka Estuary SPA, Dalkey Islands SPA, Malahide Estuary SPA, Rockabill SPA, Baldoyle Bay SPA, Rogerstown Estuary SPA, Skerries Islands SPA, Ireland's Eye SPA, Lambay Island SPA, Murrough SPA and North West Irish Sea SPA.

8.54. In combination Effects

8.55. 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 SPA 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 ZoI of the Proposed Scheme and are listed in Table 32 of the NIS submitted. Each plan and project has been individually considered for any potential in combination effects, these considerations are detailed in table 33 of the NIS submitted.

8.56. It is important to note that since the submission of the application the Dublin City Development Plan 2022-2028, Fingal County Development Plan 2023-2029 and the Climate Action Plan 2023 have been adopted. I have had regard to these plans for the purpose of assessing the potential for cumulative effects in relation to the proposed development and note that no new issues arise within the development plan that would have a materially different impact upon the cumulative impacts assessed by the applicant under the previous development plan. In addition I have reviewed the Planning Register in relation to proposed developments since the lodgement of the application and am satisfied that there are no new applications which would materially impact the proposed scheme in terms of cumulative impacts.

8.57. It is important to note 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 Metrolink. All such projects have been considered in the context of in combination effects and it is important to note that projects such as Metrolink 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.

8.58. 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.

8.59. The 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 ZoI, to arise as a consequence of the Proposed Scheme in-combination with any other plans or projects.

8.60. Mitigation measures detailed in Section 7 of the NIS and summarised within table 10 below will ensure that no adverse effects on European sites integrity will arise from the implementation of the Proposed Scheme.

8.61. 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 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.

8.62. 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.

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

8.64. 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. The Board should note that site specific mitigation measures are proposed in relation to the proposed pedestrian bridge at the Royal Canal and the construction compound at Mobhi Road. Such measures include the lowering of water level within the Royal Canal and the use of sandbags to provide a dry works are for a short period of time to prevent contamination of waters at this location during in channel works. It is also proposed to use a steel casing to prevent concrete spillage during piling works. In relation to Mobhi Road there will be no connection between the compound and existing surface water drainage system. Storage will be located away from surface water drains adjacent to the site and the area will be monitored and maintained.

8.65. I consider that all measures proposed are implementable and will be effective in their stated aims. Furthermore, an Ecologist will be employed to ensure that measures are implemented as prescribed. A summary of mitigation measures is presented in Table 10 below this list is not exhaustive and I refer the Board to the NIS for full details of the extensive list of mitigation measures proposed.

Table 10: Summary of Mitigation Measures to avoid adverse effects on European Sites

Measures to protect surface water quality and groundwater quality during construction:	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 spill kits. The use of onsite treatment for surface water runoff, use of settlement tanks/ponds and management of same. Monitoring of water bodies. Specific measures such as sandbags are

	proposed for construction compounds such as that at Mobhi Road and pedestrian crossing at Royal Canal.
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.

8.72. **Appropriate Assessment Conclusion: Integrity Test**

8.73. 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, Howth Head SAC, Howth Head Coast SPA, Rockabill to Dalkey Island SAC, Lambay Island SAC, North Bull Island SPA, South Dublin Bay and River Tolka Estuary SPA, Dalkey Islands SPA, Malahide Estuary SPA, Rockabill SPA, Baldoyle Bay SPA, Rogerstown Estuary SPA, Skerries Islands SPA, Ireland's Eye SPA, Lambay Island SPA, Murrough SPA and North West Irish Sea SPA, and that Appropriate Assessment was required in view of the conservation objectives of those sites.

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

SPA, Murrough SPA and North West Irish Sea SPA, can be excluded with confidence in view of the conservation objectives of those sites.

My conclusion is based on the following:

8.75. 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.

8.76. Consideration of the conservation objectives and conservation status of qualifying interest species and habitats

8.77. A full assessment of risks to special conservation interest bird species and qualifying interest habitats and species

8.78. Complete and precise survey data and analysis of wintering birds. The proposed development site has been scientifically verified as not being of significance to or an area favoured by SCI bird species at any stage of the wintering or summer seasons.

8.79. Application of mitigation measures designed to avoid adverse effects on site integrity and likely effectiveness of same.

8.80. 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.

8.81. Maybe just put in the standard concluding paragraph set out in the AA guidelines to make sure everything is boxed off??

9.0 Environmental Impact Assessment

Introduction

9.1. 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.

9.2. 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.

9.3. 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 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.

9.4. 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 of the EIAR.

9.5. The potential for 'flooding' is considered in Section 13 which relates to the Water Environment. I consider that the requirement to consider these factors under Article 3(2) is met.

9.6. 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.

9.7. It is important to note at the outset that the proposed development under consideration within this application does not cross international boundaries. Thus there are no transboundary effects.

Alternatives

9.8. 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.

Transit Alternatives

9.9. 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.

9.10. Metro alternative was also considered and as in the case for light rail, there is a higher capacity requirement for such solutions it was therefore not considered to be 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.

9.11. 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.

9.12. 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

9.13. 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 70 individual links were considered for the Ballymun Section and 40 no. for the Finglas section.

9.14. The Stage 1 assessment considered engineering constraints, high-level environmental constraints and an analysis of population catchments. Numerous links forming part of the 'spider's webs' were not brought forward to the Stage 2 assessment due to 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.

9.15. Following completion of the Stage 1 initial appraisal, the remaining 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, physical activity and environment. Under each headline criterion, a set of sub-criteria were used to comparatively evaluate the options which included soils and geology, hydrology, flora and fauna, potential archaeological, architectural and cultural heritage impacts, air quality, noise and vibration and landscape and visual.

9.16. Following stage 2 sifting process 2no. viable routes were identified for the Ballymun route and an additional 2no. for the Finglas route. Having regard to the information submitted it is clear that 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.

9.17. In relation to design considerations, I note that section 3.2.8 outlines technological advances in relation to travel however, whilst advances do provide new opportunities in the transport area, particularly in the area of information provision, they do not yet provide viable alternatives to the core need to provide for the movement of more people by non-car modes, including the provision of safe, segregated cycling facilities. Accordingly, there are no viable technological alternatives to meet the transport needs of this sector of the city. Therefore in terms of design I am satisfied that the proposed

infrastructure is a reasonable option that will meet the needs of transport in the city at present and into the future.

9.18. Thus, having regard to the information provided by the NTA in relation to the alternatives considered I am satisfied that a significant number of options have been considered in detail and that the process undertaken by the applicant has been a robust assessment of alternative options having regard to environmental considerations and the stated Project Objectives, which are considered to be reasonable. I agree that the routes chosen are the ones which best meet these objectives. I also accept that the consideration of options within the selected route corridor and the strategy for key infrastructure provisions was a rigorous process. I therefore generally concur with the reasons for choosing the preferred alternatives as presented in the EIAR.

Population and Human Health

9.19. 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.

9.20. 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, noise, travel patterns and behaviour in the context of the proposed development.

9.21. 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 within 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.

9.22. Issues raised in this context within the submissions received, relate to accessibility to properties both residential and commercial. Dublin City Council have requested that

access to commercial properties in terms of drop off and unloading areas are provided for and I note the NTA's response in this regard is to work with the council to provide unloading in areas where no designated space is available.

9.23. 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 during construction or rerouted traffic. Additional concerns relate to the loss of amenity space at locations identified for the use of construction compounds.

Baseline conditions

9.24. In terms of baseline conditions, it is of note that Dublin has a better health profile than average for Ireland with lower mortality rates. Based on available monitoring data, levels of air pollution are almost entirely within the EU limit values for NO2 and Particulate Matter (PM). However, there is a relatively high prevalence of exposure to excessive traffic noise, particularly at nighttime for properties close to the Proposed Scheme corridor. In terms of the economic baseline, it is of note that the proposed scheme will pass circa 300 commercial businesses.

Potential Impacts

9.25. 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 significant residual effects.

9.26. 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.

9.27. 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. Such impacts give rise to driver frustration and imped access at times and there is a potential for increases to traffic on roads catering for

diverted traffic. It must be stated however, that the proposed development will also see positive impacts which are expected during the operation of the proposed development when it is anticipated that more people will cycle, therefore improving physical health. An increase in bus use will see a reduction in car emissions along the route and will also have a positive impact on residents' overall health.

9.28. Reduced community severance will also have a positive impact on the local population in terms of overall health outcomes, as will improved accessibility to health care providers via a signficantly improved bus service.

Mitigation Measures

9.29. In relation to traffic disruption, I note 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 access to the Mater Misericordiae Hospital will be maintained and the Construction Traffic Management Plan will set out measures to minimise any delay for emergency response vehicles, specifically ambulances, in accessing the hospital. This mitigation is expected to reduce the risk of delay to be comparable to baseline conditions where existing traffic conditions can cause delays to emergency access.

9.30. 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 I whilst I acknowledge 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.

9.31. Mitigation for adverse psychosocial responses to the Construction Phase are stated to include providing the public with sufficient information to enable people to plan their days, journeys and activities around the construction works. The NTA will manage and take responsibility for community liaison and engagement during this time.

9.32. In relation to the permanent diversion of traffic to other routes as a result of the development, this 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.

9.33. Conclusion

9.34. 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.

Traffic and Transport

9.35. 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 seven no. sections as follows:

- Section 1: Ballymun Road from St. Margaret's Road to Griffith Avenue;
- Section 2: St. Mobhi Road, Botanic Road and Diversionary Route from Griffith Avenue to Hart's Corner;
- Section 3: Prospect Road and Phibsborough Road from Hart's Corner to Western Way;
- Section 4: Constitution Hill, Church Street Upper and Church Street from Western Way to Arran Quay;
- Section 5: Finglas Road from St. Margaret's Road to Wellmount Road;
- Section 6: Finglas Road from Wellmount Road to Ballyboggan Road; and
- Section 7: Finglas Road from Ballyboggan Road to Hart's Corner.

9.36. Baseline Conditions

9.37. Overall cycling infrastructure along the Proposed Scheme currently covers 58% of the route providing segregated cycle tracks along those lengths. Bus services along the Proposed Scheme currently operate within a constrained and congested environment, with approximately 54% of the route benefiting from bus lanes.

9.38. The following section of this report will outline the base line conditions in relation to the relevant sections mentioned above.

Section 1 – Ballymun Road from St. Margaret's Road to Griffith Avenue

9.39. This section of the Proposed Scheme will commence on R108 Ballymun Road at its junction with St. Margaret's Road, just south of M50 Motorway (Junction 4). It continues along this route in a southerly direction generally concluding at the junction of R108 Ballymun Road and R102 Griffith Avenue. This section includes the following:

- Two way dual carriage way with central reserve for the majority of this section.
- Footpaths – 2-4 metres wide.
- Several controlled pedestrian crossings.
- Cycle facilities are present along most of the route and are c. 1.5m wide, comprising of a mix of segregated and advisory.
- Cycle parking at 3 locations along the route.
- Bus lanes in both directions for majority of route.
- 21 bus stops along the route.
- Junctions are described in section 6.3.2.4 and include:
    - R108 Ballymun Road / St. Margaret's Road junction;
    - R108 Ballymun Road / Northwood Avenue junction;
    - R108 Ballymun Road / R104 Balbutcher Lane / R104 Santry Avenue junction;
    - R108 Ballymun Road / Balbutcher Lane / Shangan Road junction;
    - R108 Ballymun Road / Gateway Crescent junction;
    - R108 Ballymun Road / R103 Glasnevin Avenue / R103 Collins Avenue Extension junction; and

- R108 Ballymun Road / St. Pappin Road junction.

- Parking detailed in Section 6.3.2.5 of EIAR, approximately 50 spaces are available along this section of the route along with 3 loading bays.

Section 2 – St. Mobhi Road, Botanic Road and Diversionary Route from Griffith Avenue to Hart's Corner

9.40. This section of the Proposed Scheme will commence at the R108 St. Mobhi Road / R102 Griffith Avenue Junction and will extend for 1.5km to Hart's Corner in Phibsborough, where it will meet the Finglas Section of the Proposed Scheme. Section 2 also includes a diversionary / local traffic route for outbound traffic which diverts away from R108 St. Mobhi Road along Botanic Road, Glasnevin Hill, Ballymun Road to re-join R108 Ballymun Road. An alternative diversion takes users via Old Finglas Road, Cremore Villas and R102 Griffith Avenue to re-join R108 Ballymun Road, although no infrastructure changes are proposed through this route and it is not included in the scheme red line boundary. This section includes the following:

- R108 St. Mobhi Road is a two-way single lane carriageway which features one general lane in each direction.
- Footpaths on both sides 2-3.5 m in width.
- Footpaths on Glasnevin Hill on diversion route – approx1.8m wide.
- Footpaths on Botanic Road – 1.5 m wide.
- Several controlled pedestrian crossings.
- Cycle lanes vary from advisory on bus lane, to segregated.
- Southbound bus lanes are provided, there are no bus priority measures northbound.
- 14 no. bus stops along the route.
- The existing major junction arrangements along R108 St. Mobhi Road are as follows:
    - R108 St. Mobhi Road / R102 Griffith Avenue / R102 St. Mobhi Road four-arm signalised junction;
    - R108 St. Mobhi Road / Botanic Avenue four-arm signalised junction; and

- R108 St. Mobhi Road / Botanic Road/ Fairfield Road / R108 Botanic Road four-arm signalised junction

- The existing major junction arrangement along the one-way road system at Hart's Corner includes as follows:
  - R108 Botanic Road / R108 and R135 Botanic Road / R108 and R135 Prospect Way three-arm signalised junction; and
  - Lindsay Road / R108 and R135 Botanic Road / R108 and R135 Finglas Road priority junction arrangement – detailed in Section 3 of the EIAR.
- The existing major junction arrangements along the diversionary route are as follows:
  - Glasnevin Hill / Ballymun Road / Old Finglas Road three-arm signalised junction; and
  - R108 Ballymun Road / Ballymun Road / R102 Griffith Avenue four-arm signalised junction.
- 88 parking spaces are available on street within this section.

Prospect Road and Phibsborough Road from Hart's Corner to Western Way

9.41. This section of the Proposed Scheme will commence at the R108 Prospect Road / Lindsay Road Junction at the southern apex of Hart's Corner and will extend through Phibsborough over a length of 1.3 km to the R135 Western Way Junction.

- The footpath widths range from 2.5m wide to 4m wide, apart from a section of Phibsborough Road (R108 and R135) adjacent to Royal Canal Terrace which is slightly narrower and approximately 2m wide.
- Cycle infrastructure is intermittent, consisting of cycle lanes and bus lanes.
- Bus lanes are provided along this section of the route but are intermittent, with 10 no. bus stops provided.
- The existing major junction arrangements along Prospect Road and Phibsborough Road (R108 and R135) between the one-way road system at Hart's Corner and R131 Western Way are as follows:

- R108 and R135 Prospect Road / Whitworth Road three-arm signalised junction;
- Connaught Street / R108 and R135 Phibsborough Road three-arm signalised junction;
- R101 North Circular Road / R108 and R135 Phibsborough Road four-arm signalised junction; and
- R108 and R135 Phibsborough Road / R135 Western Way / R108 Constitution Hill three-arm signalised junction.
- 11 no. loading bays are present in this section and 147 parking spaces and 6 taxi ranks are available in this section.

Constitution Hill, Church Street Upper and Church Street Lower from Western Way to Arran Quay

9.42. This section of the Proposed Scheme will commence at the R135 Western Way Junction and will extend along R108 Constitution Hill and R132 Church Street for 1km southwards to the R148 Arran Quay Junction at the River Liffey, which will be the end of the Proposed Scheme.

- R108 Constitution Hill is a two-way carriageway subject to a speed limit of 50km/h. There are predominately two northbound and southbound lanes although the carriageway narrows to one lane where constrained.
- Footpaths on both sides of 2-3m wide.
- Advisory cycle lanes are provided in both directions throughout apart from a 100m section for southbound traffic along the R108 Church Street carriageway between Mary's Lane and the tram tracks of the LUAS red line.
- Public cycle rental scheme stands are located at various locations.
- There are no designated bus lanes along Section 4 of the Proposed Scheme, apart from a short 20m bus lane on the northbound approach of R108 Constitution Hill to the junction with R135 Western Way and 6 no. bus stops are provided.
- The existing major junction arrangements along R108 Constitution Hill are as follows:

- R108 Constitution Hill / Broadstone three-arm signalised junction; and
- R108 Constitution Hill / R804 Brunswick Street North / R108 Church Street Upper three-arm signalised junction.
- The only existing major junction arrangement along R108 Church Street Upper is the R108 Church Street Upper / R804 King Street North / R108 Church Street four-arm signalised junction.

- The existing major junction arrangements along R108 Church Street are as follows:
  - R108 Church Street / Mary's Lane / May Lane four-arm junction; and
  - R108 Church Street / R148 Arran Quay / R148 Inns Quay four-arm signalised junction.
- 65 no. parking spaces and 1 no. loading bay.

Finglas Road from St. Margaret's Road to Wellmount Road

9.43. This section of the Proposed Scheme will commence at the northern end at the junction of R135 Finglas Road with R104 St. Margaret's Road. Section 5 of the Proposed Scheme will extend in a south-eastern direction along the Finglas Bypass dual carriageway over a length of 1.1km and will conclude at the Wellmount Road Junction on the southern edge of Finglas Village.

- R135 Finglas Road between R104 St. Margaret's Road and Wellmount Road is a dual carriageway with a general north to south alignment.
- Pedestrian facilities are not provided along the dual carriageway section of this route and are provided at other locations along the section.
- Cycle lanes are intermittent and within bus lanes.
- Bus lanes are intermittent, and no bus stops are provided within this section.
- The existing major junction arrangements along Section 5 of the Proposed Scheme are as follows:
  - R135 Finglas Road / Casement Road / R135 North Road / R104 St. Margaret's Road four-arm roundabout; and
  - R135 Finglas Road / Wellmount Road three-arm signalised junction.

- No parking or loading bays are provided for along this section.

Finglas Road from Wellmount Road to Ballyboggan Road

9.44. This section of the Proposed Scheme will extend along R135 Finglas Road from the Wellmount Road Junction to the Ballyboggan Road Junction, over a length of 1.6km.

- R135 Finglas Road, between Wellmount Road and Ballyboggan Road, is a dual carriageway that includes a central reservation.
- Footpaths on both sides of the R135 Finglas Road between Wellmount Road and Ballyboggan Road, ranging from 2-4 m wide in general.
- Intermittent cycle lanes and cycle tracks are provided adjacent to both the northbound and southbound carriageways for most of this section.
- Bus lanes are intermittent and there are 9 no. bus stops provided along this section.
- The existing major junction arrangements along Section 6 of the Proposed Scheme are as follows:
    - R135 Finglas Road / Clearwater Shopping Centre / Glenhill Road four-arm signalised junction;
    - R135 Finglas Road / The Griffith four-arm signalised junction;
    - R135 Finglas Road / R102 Tolka Valley Road four-arm signalised junction;
    - R135 Finglas Road / Access to Tolka Vale Apartments / R102 Old Finglas Road four-arm signalised junction; and
    - R135 Finglas Road / Ballyboggan Road three-arm signalised junction.
- There are no parking and loading spaces along the main corridor of Section 6 of the Proposed Scheme.

9.45. Finglas Road from Ballyboggan Road to Hart's Corner

9.46. This section of the Proposed Scheme will extend along R135 Finglas Road for a distance of 1.5km to Hart's Corner where it will meet the Ballymun Section of the Proposed Scheme. R135 Finglas Road, between Ballyboggan Road and the one-way road system at Hart's Corner, predominately consists of a single general traffic lane

and a bus lane in each direction with the exception of additional flares at junctions to cater for turning movements. South of the R135 Finglas Road / Claremont Court three-arm signalised junction there is no northbound bus lane and therefore, the northbound there is just one general traffic lane.

- Footpaths on both sides of the carriageway of 2-3 metres wide.
- Cycle tracks are a mix of segregated narrow tracks, advisory lanes and bus lanes.
- Bus lanes are intermittent and there are 9 no. bus stops within this section.
- The existing major junction arrangements along this section of the R135 Finglas Road are as follows:
    - R135 Finglas Road / Slaney Road three-arm signalised junction; and
    - R135 Finglas Road / Claremont Court three-arm signalised junction.
- 34 no. parking spaces, 2 no. loading bays.

Potential impacts

9.47. For the purpose of the assessment of potential impacts the applicant has considered the scheme under the seven sections outlined above. I have reviewed the information in relation to all seven sections and in the interest of conciseness I will consider potential impacts in relation to the individual mode, i.e. walking, cycling, bus, private car and parking in relation to both the construction and operational phases of the development in its entirety hereunder.

Construction

9.48. In relation to the full proposed scheme, I note that 6 construction compounds are proposed and the scheme will employ 60-70 people which will rise to c. 100 at the peak of construction. The haulage of materials is expected to be minimal with the daily projected number stated as c. 17 HGV trips. The applicant has identified haul routes as follows:

- M50 Motorway;
- R108 Regional Road; and
- R135 Regional Road.

9.49. It is important to note at the outset that the proposed works will be carried out over a 24 month period and will be shorter in duration in some areas.

9.50. In terms of impacts, it is stated that traffic flows on all routes and at site compounds and works areas will be managed by the construction traffic management plan. Temporary diversions, and in some instances temporary road closures, may be required where a safe distance cannot be maintained to undertake works necessary to complete the Proposed Scheme. This in my view is reasonable having regard to the long-term benefits which will be derived for the proposed project.

9.51. All road closures and diversions will be determined by the NTA, who will liaise with the local authority and An Garda Síochána, as necessary. The need for temporary access restrictions will be confirmed with residents and businesses prior to their implementation. Impacts in relation to the foregoing are not stated to be significant or long term.

9.52. 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, it is stated that bus stops may require temporary relocation, but access will be retained in order to ensure continuity in the service. The magnitude of effects in this regard is expected to be slight to moderate.

9.53. Parking and loading locations may be temporarily impacted by construction activities along the Proposed Scheme corridor, but it is also stated that alternatives will be provided.

9.54. In general I note it is stated that significant impacts due to general traffic redistribution away from the direct study area are not anticipated as traffic flows are to be maintained in both directions. Access for general traffic to existing residential and commercial units immediately adjacent to the Proposed Scheme is to be accommodated throughout the Construction Phase.

9.55. 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

9.56. In terms of the operational impacts, I note that the assessment of impacts relates to both the functionality of the infrastructure to be provided in terms of journey times, accessibility etc, and the qualitative nature of the infrastructure, i.e whether there are direct crossing, tactile paving, dropped kerbs etc. The applicant has developed a set of criteria for each mode which are outlined in tables 6.19 and 6.22 for pedestrians and cyclists respectively. Bus infrastructure is examined in relation to the frequency of service to be provided and the infrastructure such as shelters, seating, accessible kerbs etc.

9.57. In relation to parking the applicant has clearly outlined the number of spaces to be lost at each location which is set out in paragraph 1.62 below 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. Many residents have also raised concerns within the third party submissions in relation to the loss of parking on street and request pay and display and residents only solutions. It is important to note in this regard that no significant effects are expected to arise in relation to parking, specifically in the Ballymun area of the scheme. The applicant has demonstrated that adequate car parking has been retained within both the on-street locations (as detailed below).

Pedestrian Infrastructure.

9.58. In terms of operational impact in relation to pedestrian infrastructure, it is important to note at the outset that all impacts to all 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.

Cycle Infrastructure

9.59. 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 over significant distance of the route will provide for a signficantly 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.

9.60. The magnitude of impacts in relation to cycling are stated to be positive and significant.

Bus Infrastructure

9.61. It is proposed that there will be a total of 61 bus stops along the entire length of the scheme which will be an overall reduction of 8 stops. 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.

9.62. 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 7 Project Design of this report above for detailed assessment of bus shelter accessibility.

9.63. 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 signficantly improved to that available currently.

Such improvements will have a positive and long-term impact for patrons and will not result in any significant negative effects.

Parking

9.64. As mentioned above, significant concerns have been raised by third parties in relation to the removal of on street car parking along the route of the proposed scheme. Each section of parking to be removed or added has been examined individually as follows:

Section 1 – Ballymun Road from St. Margaret's Road to Griffith Avenue

- Removal of 8 spaces along R108 Ballymun Road to the south of the R104 regional road (Balbutcher Lane / Santry Avenue).
- Additional 36 spaces to be provided R108 Ballymun Road, outside the Intreo Centre Ballymun.
- Additional 11 spaces to be provided at northbound carriageway of R108 Ballymun Road between R103 Collins Avenue Ext and the R102 one-way triangular road section.
- Loss of 10 informal spaces at R108 Ballymun Road between R103 Collins Avenue Ext and the R102 one-way triangular road section
- Loss of 4 spaces southern side of the four-lane, one way R102 Griffith Avenue carriageway.

9.65. Overall, in this section there will be an additional 22 spaces – magnitude of effects are therefore stated to be positive.

Section 2 – St. Mobhi Road, Botanic Road and Diversionary Route from Griffith Avenue to Hart's Corner

- An additional 7 spaces to be provided along this section of the route.

Section 3 – Prospect Road and Phibsborough Road form Hart's Corner to Western Way

- Loss of 34 paid parking spaces in Phibsborough Shopping Centre and loss of 3 out of 7 existing loading bays adjacent to the southbound lane of R108 / R135 Phibsborough Road opposite to Phibsborough Shopping Centre.

- Loss of 29 designated night parking spaces and two loading bays to the northbound lane of R108 / R135 Phibsborough Road, immediately north of Monck Place.
- Loss of 23 designated paid parking spaces (out of an existing 41), and six taxi rank spaces. To mitigate this loss, it is proposed that seven additional designated paid parking spaces are provided along R108 / R135 Phibsborough Road, immediately north of White Lane.

9.66. Overall impacts to parking in this section range between moderate to slight. For the benefit of the Board, an overview of parking impacts along the route will see a reduction of 93 spaces out of an existing 255 currently available. Given the availability of parking in adjacent streets the overall impact is not considered as being significant. The board should note at this juncture that the removal of parking a locations, such as Phibsborough Shopping centre have been the subject of strong objection from third parties and have been considered in detail within the assessment section of this report above, and will not be repeated hereunder. However, I am satisfied that the applicant has provided a robust justification for the removal of these spaces and has considered this particular impact in the context of the overall positive impacts to the general population in terms of health and wellbeing and accessibility to the city together with improvements to public realm and I am therefore satisfied that on balance, the loss of these spaces is outweighed by the overall positive benefits of the scheme.

Section 4 – Constitution Hill, Church Street Upper and Church Street from Western Way to Arran Quay

- Removal of loading bay located on R108 Church Street, south of Mary's Lane.

9.67. Section 5 – Finglas Road from St. Margaret's Road to Wellmount Road

- No facilities currently available and no change proposed.

9.68. Section 6 – Finglas Road from Wellmount Road to Ballyboggan Road

- No facilities currently available and no change proposed.

9.69. Section 7 – Finglas Road from Ballyboggan Road to Hart's Corner

- Relocation of existing 30 designated paid parking spaces, one disabled parking space and two loading bays to a designated car park with improved

accessibility. It is proposed to add 2 additional disabled spaces and remove three paid parking spaces from this configuration. Impacts are considered negligible in this regard.

9.70. The Proposed Scheme will formalise the parking arrangements at aforementioned locations and will improve the street environment, particularly for pedestrians and cyclists and enable a signficantly improved and more efficient bus service along this route. 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 to have a 'Negative, Moderate and Long-term' effect. I am satisfied that no significant effects arise in this regard. It is important to state at this juncture, however, that the loss of a single loading bay on R108 Church Street, south of Mary's Lane and the lack of replacement of same at a similar location is not acceptable. Should the Board be minded to grant permission, I recommend that a number of existing spaces on the opposite side of the road whereby no loss of parking is proposed, should be utilised to accommodate a loading bay. The provision of a loading bay at this location will be restricted to normal opening hours and will therefore not result in any loss to nighttime parking for residents.

Benefits of the scheme

9.71. In terms of the modelled benefits of the proposed scheme, I draw the Board's attention to section 6.4.6.2.1 of the EIAR in which the movement of people is assessed. The 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 29%. Private car use for the same year is predicted to decrease by 39%. The PM peak for the same year is predicted to have a similar modal shift with 24% of people walking outbound, and a 48% reduction in the private car.

9.72. Modelled modal shifts for the year 2043 also see a significant increase in people walking and cycling with a 17% increase in the am peak hour and an 21% increase in the pm peak hour and a greater uptake of public transport with an additional 22% passengers in the am peak hour of 2028 and an additional 34% for the same peak

hour in the 2043 year. PM hours also see increases with an increase of 26% in 2028 and 56% in 2043.

9.73. The Board should note that individual routes have been examined in terms of efficiencies and overall impacts to service are examined in detail within chapter 6 of the EIAR.

9.74. The overall magnitude of the forgoing modelled changes is positive, significant and long term. 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.

9.75. 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.

9.76. 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

9.77. Given the improvements to bus priority, walking and cycling as a result of the Proposed Scheme, there will be an overall reduction in operational capacity for general traffic along the direct study area. This area will see a reduction in general traffic numbers of between -344 and -1106 (vehicles per hour) combined general traffic flows along the direct study area during the AM Peak Hour in the Opening Year (2028).

9.78. In addition to the foregoing, there are also reductions in general traffic noted along certain road links within the indirect study area during the AM Peak Hour. These links are detailed in table 6.77 and will see a reduction of between -103 and -471 cars per hour overall in this period. The magnitude of effects to these roads, which will experience a reduction in traffic, is therefore positive.

9.79. However, there are other link roads which will experience an increase in traffic, of these, a number will exceed the 100 flow additional traffic threshold (this is the

threshold at which further analysis is required of road and junction capacity) at the AM peak hour, these roads are outlined in table 6.78 of the EIAR. It is stated that the increase in traffic on these roads will increase by between 101cars per hour and 297 during the peak AM hour.

9.80. As a consequence of the increases in traffic, the roads listed in table 6.78 have been examined in terms of their operational capacity including junction capacity to accommodate the additional traffic. I note that the modelling was based on the worst performing arm of each junction as a worst case scenario assessment.

9.81. The Board should note that national roads will not experience more than a 2% increase to traffic and as the threshold to trigger a detailed assessment of these routes is a 5% increase, no further assessment is required.

9.82. According to the EIAR, the majority of assessed junctions that required further traffic analysis had outcomes that are broadly similar before and after the Proposed Scheme, with the exception of the following junctions which are stated to possibly experience Negative and Moderate impacts:

- R804 King Street North / Beresford Street / King Street North; and
- Ratoath Road / The Bogie's Roundabout / The Bogie's Roundabout.

9.83. Overall, it is determined that there will be a Negative, Slight and Long-Term impact from the redistributed general traffic as a result of the Proposed Scheme. The Board should note that no junctions are predicted to experience significant effects. Overall, I am satisfied that the applicant has carried out a robust and detailed assessment of the surrounding road network and the capacity of the network to absorb an additional diverted traffic as a result of the proposed scheme.

Mitigation

9.84. Traffic and transport mitigation measures are set out in section 6.5 of the EIAR. It is stated within this section that construction related mitigation will be included within the CEMP and the implementation of this document will ensure disruption and nuisance are kept to a minimum during the Construction Phase. I note that 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).

9.85. 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 agreed with the road authority and will include measures to minimise the impacts associated with the Construction Phase upon the peak periods of the day.

9.86. No mitigation measures are proposed for the operation of the proposed scheme. Residual impacts remain as stated above and will not be significant.

Conclusion

9.87. I have 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. I am also satisfied that the long term operational impacts will be positive for public transport users, cyclists and pedestrians and will have an overall positive impact on the well being of people circulating within the area of the proposed scheme.

9.88. **Air and Climate**

9.89. 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

9.90. The key pollutants considered relevant to the proposed development are identified as:

- Nitrogen Dioxide

- Dust
- Particulate Matter PM_{10} and $PM_{2.5}$
- Greenhouse gases; Carbon Dioxide (CO_2), Sulphur Hexafluoride (SF_6)

9.91. The EIAR submitted outlines, within table 7.2, the upper limits for the above pollutants and within Sections 7.2.2, 7.2.2.2 and 7.2.2.3, the relevant international and domestic legislation and policy pertaining to same. Baseline 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.

9.92. In relation to baseline levels, I note that the most recent annual report at the time of assessment is Air Quality in Ireland 2022 (EPA). The Board should note that the EIAR refers to Air Quality in Ireland, 2019. I have reviewed the most recent report and have taken it into account in my assessment hereunder. It is stated that a long term assessment of air quality was undertaken to inform the EIAR and data from the Swords, Ballyfermot, Rathmines, Coleraine Street and Winetavern Street stations were reviewed for the period 2015-2019. The result of these trends in relation to NO_2 are outlined in table 7.14 of the EIAR.

9.93. In addition, the EPA has gathered NO_2 data using the passive diffusion tube methodology in proximity to the Proposed Scheme. Concerns have been raised about this data within the submissions made and as stated above, I note that the applicant outlines that diffusion tube data was collected over a seven month period (15 November 2019 to 8 June 2020), however due to COVID-19 impacts on the baseline traffic environment, the final two data sets (16 March 2020 to 8 June 2020) are considered non ‘typical’ baseline data (full lockdown was implemented on 27 March 2020), and therefore, are not included in the baseline data set. This a reasonable approach to data interrogation and I am satisfied that the applicant has utilised the most relevant data in the assessment of air quality. Diffusion tube monitoring data is outlined in table 7.16 of the EIAR.

9.94. In relation to data collection, the Board should note that under the TII Air Quality Guidelines (TII 2011), a minimum of one-month baseline monitoring is required, ideally

extending to at least three months, the applicants have collected four months of pre covid baseline data.

9.95. Air quality monitoring locations are outlined in table 7.17 and results are outlined in table 7.18. I note that ninety exceedances were modelled at receptors on R132 Dorset Street / R804 King Street North / R132 Bolton Street / Church Street, R108 Phibsborough Road / R135 Finglas Road / R108 Botanic Road / R108 High Street, R148 Arran Quay, R804 Queen Street and R805 Manor Street. Such occurrences demonstrate the urgent need for an overall improvement in air quality in the city.

Potential Construction Impacts

9.96. During the Construction Phase of the Proposed Scheme, works will involve predominately utility diversions, road widening works, road excavation works (where required), road and junction reconfiguration and resurfacing works, public realm improvements including landscaping, and construction access routes including movement of machinery and materials within, and to and from, the Construction Compounds along the Proposed Scheme.

9.97. For the purposes of the EIAR seven individual construction sections are set out. Sections may be completed simultaneously and combined in certain areas as follows:

- Section 1: Ballymun Road from St. Margaret's Road to Griffith Avenue;
- Section 2: St. Mobhi Road and Botanic Road from Griffith Avenue to Hart's Corner:
    - Section 2a: Griffith Avenue to Botanic Road;
    - Section 2b: Griffith Avenue;
    - Section 2c: Ballymun Road, Glasnevin Hill and Botanic Road; and
    - Section 2d: Botanic Road to Prospect Way.
- Section 3: Prospect Road, Phibsborough Road from Hart's Corner to Western Way:
    - Section 3a: Prospect Way to Lindsay Road;
    - Section 3b: Lindsay Road to Royal Canal;
    - Section 3c: Royal Canal to Western Way; and

- Section 3d: Royal Canal Bank Cycleway.

- Section 4: Constitution Hill and Church Street to Arran Quay:
  - Section 4a: Western Way to Coleraine Street;
  - Section 4b: Coleraine Street to Arran Quay; and
  - Section 4c: Markets Cycleway.
- Section 5: Finglas Road from St. Margaret's Road to Wellmount Road;
- Section 6: Finglas Road from Wellmount Road to Ballyboggan Road;
- Section 7: Finglas Road from Ballyboggan Road to Hart's Corner:
  - Section 7a: Ballyboggan Road to Claremont Lawns;
  - Section 7b: Claremont Lawns to St. Vincent's School; and
  - Section 7c: St. Vincent's School to Hart's Corner

9.98. 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.

9.99. The magnitude of dust emissions is defined in relation to each specific activity, as follows:

- Earthworks – large impact as the area is in excess of 10,000m^2 and there may be between 5 and 10 heavy earth moving vehicles active at any one time. The dust emission magnitude for the proposed earthwork activities required for the Proposed Scheme can be classified conservatively as 'medium'.

9.100. Notwithstanding that the impact is large, the magnitude of effects from this activity to human health and ecological receptors prior to mitigation is defined as 'temporary and medium'.

- Construction works – the area is limited and works relate to the laying of paving and hard landscaping along the route. No buildings are proposed as part of the construction works.

9.101. The magnitude of effects to ecological receptors and human health arising from construction works prior to mitigation is defined as 'medium and temporary'.

- Trackout movements – medium impact, such activities may comprise of 10 to 50 HDV (heavy duty vehicles) outward movements in any one day during peak construction activity with surface material with a low potential for dust release.

9.102. The magnitude of effects to human health and ecological receptors in relation to track out movements prior to mitigation is defined as 'medium and temporary'.

9.103. Construction traffic – 12 public roads are identified as required construction access routes where construction traffic will be permitted to travel along. An additional 88 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, a much lower number of vehicles is proposed within the transport and traffic chapter of the EIAR which assumes c.17 lorries per day in relation to works at a particular section as it is not proposed to build out the entire scheme simultaneously. 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.

9.104. The potential air quality impacts associated with additional construction traffic is examined in relation to NO_x, PM_{10}, and $PM_{2.5}$. Modelled receptors are outlined in table 2.2 within Appendix A7.1 Volume 4 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. 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. In terms of ecological receptors I note that impacts in this regard are expected to be 'Negative, Slight and Short-Term'.

Mitigation

9.105. Mitigation measures proposed during the construction phase of the development relate to the suppression of dust. Such measures include road sweeping, water misting or spraying during dust generating activities, use of tarpaulins when transporting materials and use of site hoardings of 2.4 metres in height. Significant residual impacts are not expected to arise.

Mitigation for Operational phase

9.106. No mitigation is proposed in relation to the operational phase of the proposed scheme and no residual impacts are expected.

9.107. I have considered the potential for cumulative impacts to arise in relation 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.

9.108. 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 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. It is clear that the proposed development will have an overall positive/neutral impact on air quality as a result of a modal shift to more sustainable forms of travel within the route and with the introduction of electric bus fleet. I note that the EIAR states that there are residual moderate adverse impacts expected at the R101 North Circular Road Junction with R108 Phibsborough Road. It is apparent that exceedances of NO_2 currently occur at this location and these exceedances will remain during the opening year of 2028 however these levels are expected to reduce over time with the magnitude of impacts expected to be slight adverse or negligible by 2043.

9.109. Based on the information submitted, I am satisfied that the proposed development will not give rise to significant impact to air quality and will have a positive impact in terms of the long term outlook.

Climate

9.110. 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 2023 (CAP 23) as a key project that will contribute to the reduction in GHG within Irelands cities. The CAP 23 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.

9.111. Impacts to climate are considered within section 8 of the EIAR and are considered in the context of GHG emissions relating to land use 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

9.112. It is important to note at the outset that the key phases of the GHG generation are the embodied carbon of the construction materials and the construction activities, which, when combined, account for 88% of all carbon emissions. Pre-construction together with construction waste is expected to account for 12% of all emissions.

9.113. The applicant states that the Proposed Scheme is estimated to result in total Construction Phase CO2eq[1] emissions of 9316 tonnes embodied CO2eq for materials over a 24-month period, equivalent to an annualised total of 0.008% of Ireland's national GHG emissions in 2019 or 0.012% of Ireland's non-ETS 2020 target.

9.114. In order to provide clarity to the Board, it is important to consider the proposed construction related emissions in the context of CAP23 and the agreed Sectoral Emission Ceilings for transport projects within this document. In the context of the 2021-2025 carbon budget period, the proposed development represents 0.01725% of the transport emission ceiling for the period. It is likely that construction will extend into the following carbon budget period of 2026-2030 and as such the proposal would represent 0.02517% of this period's emission ceiling allocation (if it were to be constructed fully in this period).

9.115. It is important to reiterate at this juncture that the aforementioned climate emissions relate solely to embodied carbon during the construction phase of the development.

9.116. 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 CAP 23 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

[1] Carbon Dioxide Equivalent

negative, significant and short term. In an attempt to provide some context to the carbon emissions figures provided, the applicant states that the construction impacts are equitable to the construction phase of a three-bed housing development of 186 units. I consider this to be a useful comparison in order to visualise the quantum's referred to..

9.117. 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 CAP 23, that the construction phase of the proposed development would not give rise to any long term significant climate impacts and has been adequately assessed and quantified within the EIAR .

9.118. In relation to mitigation measures proposed for the construction phase of the development I note that the applicant proposes a number of measures which include the reuse materials were feasible, the sourcing of materials locally and the replacement of concrete containing Portland cement with concrete containing ground granulated blast furnace slag.

Potential Operational Impacts

9.119. 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 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 23 in which updated figures are provided. Latest figures state that transport is responsible for 15.7% of the national GHG output and importantly has been the fastest growing source of GHG emissions over the past three decades, showing a 112% increase between 1990 and 2021.

9.120. 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 14,500 and 15,200 car trips per weekday from the road network in 2028 and 2043 respectively. This represents a significant contribution towards the national target of reducing car emissions by 1.87$MtCO_2eq$[2] by 2025 and 3.79 $MtCO_2eq$ by 2030 as set out in tables 15.4 and 15.5 of CAP 23. I note from the information submitted that haulage and heavy goods road freight emissions are not projected to decrease and are essentially outside of the scope of this development.

9.121. In relation to impacts to sequestered carbon I note a number of trees (circa 275 no.) will be removed as part of the earth works and preparation stage of construction and third parties have expressed their concerns in this regard. Whist I acknowledge the concerns raised, I note it proposed to replant 515 no. trees, 2,478m of hedging, 6884m^2 of native planting and 3562m^2 of ornamental planting which taken in the context of the proposed construction works will have a neutral and positive effect on the sequestering of carbon over the life of the development.

9.122. In summary of the foregoing, the applicant has stated that the magnitude of effects arising from the operation of the development will be 'Neutral and Permanent' no mitigation measures are proposed for the operation of the scheme, however mitigation as outlined in relation to the construction phase in terms of reuse of materials and replacement of Portland cement with concrete containing ground granulated blast furnace slag.

9.123. Having regard to the information submitted and the requirements outlined within CAP 23, 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 also satisfied that the proposal is supported by the recently adopted CAP 23 which

[2] Million Tonnes of Carbon Dioxide Equivalent

was not finalised prior to the submission of this application but is nonetheless essential to the assessment of the development in the foregoing context.

9.124. 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 and am satisfied that the proposed development which proports to achieving an overall reduction in CO2eq of 6000 tonnes will have a positive impact on achieving the overall reduction required for Ireland.

Conclusion

9.125. 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.

Noise and Vibration

9.126. Chapter 9 of the EIAR examines the potential for impacts to arise in relation to noise and vibration. It is important to note at the outset that a significant number of third-party submissions have raised concerns in relation to operational noise which could impact residential amenity. Specifically, the loss of trees near Constitutional Hill which was raised by Dublin City Council in their submission. The replacement of these trees with birch is not considered acceptable for noise attenuation and the Council seek consultation in this regard in order to agree the replacement species. The following section of this report will examine the potential for such impacts to arise in relation to the proposed development.

Baseline Conditions

9.127. 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. Baseline Noise monitoring for the proposed scheme was undertaken during January, February and April 2019 and June to October 2020. As the baseline noise monitoring was carried out during Level 2 and Level 3 of the Covid-19 restrictions, a review has been carried out on logged L_{Aeq} raw data, provided by DCC, for noise monitors between June to October in 2019 and 2020 to identify any changes in noise levels across the two year period. I note the overall difference in the aforementioned noise monitoring period was between 1dB and 2dB.

9.128. 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. Baseline data results identify road traffic as the dominant noise experienced along the route during both daytime and nighttime hours. Average background noise during daytime hours varies along the route with some areas experiencing higher background noise levels than others. Results indicate exceedances in existing ambient noise levels at various locations along the route. This can be attributed to traffic volumes along the route. Ambient noise recorded at the locations outlined within the appendix of the EIAR as referred to above ranged between 55dB and 68dB. It is clear from the range recorded that the study area is a high noise environment. High noise levels were also recorded during nighttime hours. Noise during this period is also dominated by road traffic.

9.129. I draw the Boards attention to Section 9.3 of the EIAR in which a description of baseline noise is provided for each section of the proposed scheme and the nearest noise sensitive locations identified. Noise sensitive locations comprise of dwellings, hotels, churches and educational facilities. The noise sensitive receptors are located between 5 and 20m away from the route. Noise experienced at some of these locations are as high as 72dB during day time hours and 64dB at night.

9.130. 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

9.131. Noise generation will arise in relation to construction works and the operation of plant during the construction phase. Increased noise levels are also anticipated due to the increase in buses utilising the route during operational phase. 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.

9.132. 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 from the proposed works at noise sensitive locations. I draw the boards attention to tables 9.32 – 9.46 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 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 ranges from slight to very significant, on a temporary basis and over the short term during both daytime and nighttime hours.

9.133. Whilst there are exceedances expected in relation to unmitigated noise emissions from construction activity, in the majority of instances as shown within the aforementioned tables, a number of significant exceedances are expected within both the Ballymun and Finglas sections of the proposed route whereby high noise levels of up to 83dB are expected arising from road widening and utility diversion works and the use of vacuum excavators at St. Mobhi Road and Finglas Road. Activities such as kerb cutting is also expected to give rise to noise emissions of c. 80dB at at NSL's at various sections along the route.

9.134. Construction traffic has also been modelled in terms of noise impacts and it is expected that 510 HGV movements (255 vehicles) will occur over a peak construction day. It should be noted that such figures are excessive when considered within the context of the nature of the proposed works to be carried out and are at variance with predicted construction traffic predictions outlined within the traffic chapter of the EIAR which predicts 17 HGV movements per day. Given the nature of the works and that it is intended to carry out the development in a phased manner, I consider that the predicted number of movements within the noise chapter have been outlined in error. Should the Board require further clarity on this matter they can do so by way of further information, however I am satisfied that the movement of vehicles into and out of the

site can be adequately dealt with by way of condition which restricts the number of vehicles to a maximum of 100 daily which would not impact the capacity of the road surrounding road network and would be in accordance with predicted HGV and HDV movements outlined in the other relevant chapters of the EIAR.

9.135. Modelling has been carried out at numerous locations outlined in section 9.4.3.4 of the EIAR which will not be repeated hereunder. Modelling results during the assessed construction year 2024, indicate that the highest potential noise impacts are calculated along Glendalough Road, Crawford Avenue, and Hollybank Road due to traffic redistribution during construction works along the Proposed Scheme. The change in traffic noise is defined as 'major' with the traffic noise level calculated at the closest NSLs along these three roads categorised as 'medium'. The overall impacts are determined to be 'Negative', 'Moderate to Significant' and 'Temporary'.

9.136. I draw the boards attention to table 9.49 of the EIAR in which construction impacts in relation to all other relevant roads are considered and range between negative'slight /moderate' and 'temporary'.

9.137. Construction compounds are considered within table 9.40 of the EIAR in terms of noise generation. Unmitigated noise emissions from these compounds ranges between 52 and 68dB with exceedances expected in relation to evening and weekend noise upper limit thresholds.

9.138. In relation to piling activities, I note that bored piling rigs will be used in the Prospect Road, Phibsborough Road: Hart's Corner to Western Way geographical section for the following proposed structures:

- Pedestrian / cycle bridge over railway line at Lindsay Grove, widening with new cycle bridge, at R108 Prospect Road;
- Pedestrian / cycle bridge over railway line at Whitworth Road
- Pedestrian / cycle bridge over the Royal Canal; and
- North Circular Road Underpass, proposed under R101 North Circular Road.

9.139. Noise levels are typically in the range of 61 to 77 dB in relation to this activity. Daytime exceedances are likely within 15 metres of such works in the absence of any mitigation.

9.140. Potential impacts arising from vibration are associated with the groundbreaking activities and piling. I note from the information submitted that the magnitude of effects associated with this activity is stated as negative, slight to moderate and temporary at distances of 10m from the activity. Beyond 50m from this type of activity, impacts are stated to be reduced to imperceptible to slight and temporary.

9.141. 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 a no significant effects arise from the proposed works.

9.142. In terms of the operational phase of the development, as mentioned above, noise impacts have the potential to arise from changes in traffic volumes, private traffic will reduce on the route and there will be an increase in buses along the route. In addition, redistributed traffic onto surrounding local road network will also have the potential to affect noise levels. It is important to note at this juncture that impacts in this regard are not expected to be significant in the long term.

Mitigation Measures

9.143. Mitigation measures are included within the Construction Management Plan and are discussed in Section 9.5 of the EIAR. It is clear that the largest magnitude of effects arises at distances of 15 metres from the proposed works and relate to construction related activities whereby concrete is to be removed and replaced and road widening is to be carried out. Other significant impacts arise in relation to works being carried out during evening and weekend hours whereby the upper limit for ambient noise is lower.

9.144. 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 up to 10dB. Mufflers will be fitted to pneumatic concrete breakers and tools, noisy machinery will be placed away from NSLs and sensitive boundaries. Compressors will be sounded 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. Such measures can also reduce noise levels by up to 10dB.

9.145. 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.

9.146. 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.

9.147. Overall mitigation measures are expected to reduce noise levels by 10dB. As outlined above, baseline daytime noise levels are c. 67dB and evening baseline levels are 65dB. Following mitigation, the highest predicted construction noise levels are between 67 to 73 dB $L_{Aeq,T}$ 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.

9.148. 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

9.149. Significant residual impacts remain during nighttime and evening hours in relation to the following works:

- Quiet street treatment works,
- Construction compound

- Boundary wall construction works

9.150. 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.

9.151. 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

9.152. 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.

Archaeology, Cultural Heritage & Architectural Heritage

9.153. 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

9.154. 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. There are two distinct routes within the proposed scheme i.e the Ballymun section and the Finglas section. With regard to the Ballymun section it is stated that the route which follows the R108 was a rural landscape until the 20th Century and as such would have been more sparsely populated that the more urban sections of the route. The Finglas route which travels along the R135 and follows the Tolka River in an area where significant historical finds have been recorded.

9.155. The Proposed Scheme will pass through Phibsborough and Broadstone, before entering the Zone of Archaeological potential (ZAP) of the Historic City of Dublin at R108 Constitution Hill. In overview of the scheme, I note that 57 Protected structures or groups of Protected Structures were identified. Of these, 50 will share a common boundary with the Proposed Scheme. Forty-seven are of Regional Importance and Medium Sensitivity.

9.156. Seven post boxes of architectural significance were identified in the study area, as outlined in Section 16.3.1.10.1 and described in Appendix A16.2 Inventory of Architectural Heritage Sites in Volume 4 of this EIAR. These post boxes are of Regional Importance and Medium Sensitivity. All of the post boxes will be retained in position, and none of them will be directly impacted during the Construction Phase.

9.157. For the purpose of consideration of this element of the EIAR, the route has been broken into sections and examined under each section in relation to Archaeology, Cultural Heritage & Architectural Heritage as follows:

- From Ballymun Road at St. Margarets to Griffith Avenue –
    - No national monuments or sites under preservation order are located within or in the vicinity of this section of the Proposed Scheme. Two recorded archaeological monuments both of which relate to the same site, the former Stormanstown House (RMP DU014-067001; DU014-067002) which have been demolished. No sites of cultural heritage interest were identified along this section.
- St. Mobhi Road and Botanic Road to Griffith Avenue to Harts Corner –

- No national monuments or sites under preservation order are located within or in the vicinity of this section of the Proposed Scheme. The route passes by Glasnevin Cemetery, a number of individual sites are identified within the cemetery and are within 50 metres of the proposed works.
- The route also passes by the 18th century Director's residence of the Botanic Gardens which is a RMP / SMR site (RMP DU018-005009). A list of all sites within (of which there is one Glasnevin Cemetery) and those within 50 metres of the proposed scheme is provided within table 15.6 and 15.7 of the EIAR.
- Details of industrial heritage sites are outlined in section 15.3.3.5 of the EIAR and refer to old tram tracks under the carriageway surface and Glasnevin Bridge which was replaced in the 1990's.

- Prospect Road, Phibsborough Road from Harts Corner to Western Way –
  - No national monuments or sites under preservation order or archaeological monuments, are located within or in the vicinity of this section of the Proposed Scheme. Six recorded industrial heritage sites are located along this section of the Proposed Scheme, all of which relate to former transport infrastructure; canal and tram sites.
- Constitutional Hill and Church Street to Arran Quay –
  - No national monuments or sites under preservation order are located within or in the vicinity of this section of the Proposed Scheme.
  - This section of the Proposed Scheme will travel through the Historic City of Dublin (RMP DU018-020) from R108 Constitution Hill to R148 Arran Quay and R148 Inns Quay.
  - There are 27 sites adjacent to the Proposed Scheme and a further four which are in the vicinity and whose ZAPs extend into the Proposed Scheme, details of which are provided in section 15.3.5.2.
  - There are three industrial heritage sites recorded, one of which is Forster Aqueduct which was demolished in the 1950's with only the ashlar wall remaining.

- Finglas Road from St. Margaret's Road to Wellmount Road, -
    - No national monuments or sites under preservation order within or in the vicinity of this section of the Proposed Scheme. One site, King William's Rampart, is on the Register of Historic Monuments (RMP DU014-066008).
    - There are seven recorded monuments adjacent to this section of the Proposed Scheme. They comprise of St. Canice's Church and associated monuments (RMP DU014-066009; DU014-066010; SMR DU014-066015; DU014-066016; DU014-066017), 'King William's Rampart' which forms the town defences (RMP DU014-066008).
- Finglas Road from Wellmount Road to Ballyboggan Road –
    - No national monuments or sites under preservation order within or in the vicinity, one recorded archaeological site within the Proposed Scheme and two adjacent to it Finglas Bridge' (RMP DU018-002); a mill (RMP DU018-001), a mound (RMP DU014-077).
    - There are two recorded industrial heritage sites i.e two bridges.
- Finglas Road from Ballyboggan Road to Hart's Corner –
    - No national monuments or sites under preservation order, no recorded archaeological sites or industrial heritage sites within or adjacent to this section.

9.158. The Board should note that the applicant has provided a list of all Protected structures along the route within table 16.7 of the EIAR submitted in addition a list of buildings contained within the National Inventory of Architectural Heritage site is also provided within table 16.9 of the EIAR. The Board should note in this regard that inclusion on the NIAH does not afford statutory protection.

9.159. The proposed development also overlaps with two Architectural Conservation Areas i.e Prospect Square / DeCourcy Square and Environs ACA and The Phibsborough Centre ACA.

9.160. In terms of street furniture and areas of historical paving I draw the Board's attention to tables 16.14 to 16.6 of the EIAR in which full list is provided of such items and their

location within the scheme. The sensitivity of these features ranges from 'Regional Medium' to 'local low sensitivity'. Impacts to such features will be considered hereunder. It is of note however that there are no features of national significance or regional significance along the route.

Potential Impacts in relation to Archaeology & Cultural Heritage

9.161. Potential impacts to archaeology and cultural heritage relate to the construction phase of the proposed development and are associated with works relating to ground breaking activities which would be carried out in relation to pavement construction, repairs and reconstruction works; resurfacing works; piling; and any excavations of soil, including landscaping works, ground disturbance for utilities and grubbing up works.

9.162. Of relevance to the proposed works in terms of potential impacts to archaeology is Glasnevin cemetery. It is possible that the burial ground extended further west to the Proposed Scheme and that any remains will be impacted by any ground-breaking works at this location. The ZAP for this burial ground has a medium sensitivity value and the magnitude of impact is considered to be medium. Therefore, the potential impact will be 'Negative', 'Moderate' and 'Permanent'.

9.163. I note that the magnitude of impacts to archaeological sites is slight and permanent. No cultural heritage sites were identified.

9.164. In order to minimise and avoid such impacts, it is proposed to carry out monitoring of any excavation or groundbreaking works. This will ensure that in the event such material is encountered, it is preserved and recorded appropriately.

9.165. The operational phase of the proposed development will not give rise to impacts to archaeology, recorded monuments or cultural heritage as a whole.

9.166. For ease of reference I draw the Board's attention to tables 15.19 to 15.25 of the EIAR in which Construction impacts are outlined in relation to archaeology and cultural heritage, in summary no impacts of significance are expected in this regard.

9.167. Whilst no significant impacts are expected to arise in regard to the foregoing I note that potential archaeological material may remain under three of the proposed compound sites, i.e B3, B1, F1, the applicant has acknowledged this and recommends

appropriate mitigation to prevent any such impact from arising which will be outlined hereunder.

Mitigation for Archaeology & Cultural Heritage

9.168. Mitigation measures proposed include the following:

- Archaeological monitoring to be carried out under licence to the DHLGH and the NMI, and the proper excavation and recording of, all archaeological soils, features, finds and deposits which may be disturbed below the ground surface.
- In the case of cellars, coal cellars and / or basements, the appointed contractor in consultation with the archaeologist engaged by them will make provision for a geodetic survey and recording of each individual structure which will be subject to impact. This survey and recording will be carried out in advance of any construction works on cellars, coal cellars and / or basements.
- 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.
- In the event of archaeological features or material being uncovered during the Construction Phase, all machine work will cease in the immediate area.
- Secure storage for artefacts recovered during the course of the monitoring and related work will be provided.
- Archaeological investigation will be carried out prior to any works where any newly discovered features are present along the site.
- Features to be removed or relocated will be done under supervision.

9.169. No operational mitigation is required.

Potential Impacts in relation to Architectural Heritage

9.170. As mentioned above 50 Protected Structures share a boundary with the proposed scheme, impacts are therefore indirect and will potentially arise in relation to the

construction phase of the development. The magnitude of effects in this regard are stated to be 'negative', 'moderate' and 'temporary'.

9.171. Three of these structures which area adjacent to but not within the proposed development boundary are of National Importance and High Sensitivity (National Botanic Gardens DU018-009, King's Inns and Registry of Deeds DCC RPS 6358 2030, 2031 and Glasnevin Cemetery DCC RPS 2745). The magnitude of impact is 'Medium'. The potential Construction Phase impact will be 'Indirect', 'Negative', 'Significant' and 'Temporary'.

9.172. I draw the Board's attention to section 16.4.3.1 of the EIAR in which it is stated that the Former Players Factory which is a Protected Structure DCC RPS 855 will be impacted by the development, the impact will arise in relation to the acquisition of land at the front boundary of this development which will require the relocation of the boundary which is original to the building. The magnitude of effects are stated to be 'significant' and 'permanent' in this regard.

9.173. The magnitude of effects to the setting of the Phibsborough ACA are expected to be 'Negative', 'Moderate' and 'Temporary'. Such impacts will arise from the temporary moving of street furniture, upgrading of surfaces etc. I note that DCC have requested that the applicant replace and reinstate all items of architectural heritage when the works are complete. I am satisfied that the applicant will carry out such reinstatement works and will adequately protect features of architectural heritage during the course of the works.

9.174. The route also passed by the boundary of the Prospect Square / DeCourcy Square and Environs ACA, the proposed works in this area will be minor in nature and the magnitude of effects is therefore expected to be negligible. I note DCC comments in this regard in relation to the design of bus stops, this has been considered within the assessment above and will not be repeated at this juncture.

9.175. It is of note that the application documentation includes an assessment on the DCC conservation areas which include the following:

- River Tolka and Botanic Gardens Conservation Areas
- Royal Canal Conservation Area
- Broadstone Conservation Area

- King's Inns Conservation Area
- St Michan's Roman Catholic Church Conservation Area

9.176. It is important for the Board to note that these are not Architectural Conservation Areas but are conservations areas that have been defined as such for the purpose of the Dublin City Development Plan. Impacts to such areas arise from construction and the magnitude of effects ranges from negative moderate and permanent to no impacts with the Royal Canal being the most affected due to the proposed new bridge, upgrading of surfaces and alteration of historic walls at the entrance to Cross Guns Tunnel. I note DCC has no objection to the proposed works but recommends that all works are completed in a sensitive manner.

9.177. Potential impacts to street furniture are outlined in section 16.4.3.5. 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.

9.178. Overall general impacts to architectural heritage arise in relation to the alterations to bus stop locations, particularly where these include the erection of new shelters, 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 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 adjacent ACAs also.

9.179. Overall, with the exception of the relocation of the Former Player's Factory front boundary no permanent negative impacts of significance are expected as a result of the development.

9.180. I draw the Board's attention to table 16.17 of the EIAR in which all of the potential construction impacts, and the magnitude of same are summarised for ease of reference.

9.181. Significant impacts do not arise in relation to the operation of the development. Operational impacts in relation to Protected Structures and ACAs are expected to be positive or neutral due to public realm improvements with the exception of the Royal Canal whereby the proposed new bridge will partially impact views of the Cross Guns Bridge.

Mitigation

9.182. I refer the Board to Section 16.5 of the EIAR in which mitigation measures are proposed in relation to the proposed works. Such measures include the following:

- In relation to the removal of front boundary at Former Players Factory – it is proposed to record every item, label the affected railings, gates, gate posts, capping stones and historic masonry, prior to its careful removal to safe storage; and reinstate the removed items on new lines, which faithfully reinstate the existing details, including maintaining the relationship between the gate and the front entrance to the building.
- Employment of an Architectural Heritage Specialist to monitor all works and to record all materials during removal and replacement.
- Employment of an archaeologist to monitor all ground works at locations whereby archaeological material is known or suspected to be present. The Archaeologist will record and preserve material as appropriate and will determine measures to for the protection of materials or features during the work period.
- The reuse of materials where appropriate.

9.183. No mitigation is proposed in relation to the operational phase of the development as impacts are slight or not significant.

9.184. Following mitigation, no residual impacts are expected.

Conclusion

9.185. I have considered all 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.

Landscape and Visual

9.186. 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. 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.

Baseline Conditions

9.187. 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.

9.188. For the purpose of the visual & townscape assessment, the proposed route has been divided into seven sections as follows:

- Section 1: Ballymun Road from St. Margaret's Road to Griffith Avenue;
- Section 2: St. Mobhi Road and Botanic Road from Griffith Avenue to Hart's Corner;
- Section 3: Prospect Road and Phibsborough Road from Hart's Corner to Western Way;
- Section 4: Constitution Hill and Church Street to Arran Quay;

- Section 5: Finglas Road from St. Margaret's Road to Wellmount Road;
- Section 6: Finglas Road from Wellmount Road to Ballyboggan Road; and
- Section 7: Finglas Road from Ballyboggan Road to Hart's Corner.

9.189. 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 Ballymun Road from St. Margaret's Road to South District Centre above the area is located within the outer suburbs and comprises predominately two-storey residential with newer taller developments and areas of undeveloped lands. The route is predominantly dual carriageway. There are no amenity designations, tree preservation orders (TPO's), protected views or Protected Structures along this section.

9.190. Section 2 which encompasses Ballymun Road from South of Ballymun District Centre (Gateway Avenue) South to Griffith Avenue is located within the outer suburbs and comprises dual carriageway flanked by predominately two-storey residential dwellings, educational, religious and sports facilities. The area contains a residential conservation area at Hampstead Avenue and has amenity designations including, major open space / public park at Albert College (Hampstead) Park. Recreational open space at DCU Sports Campus / St. Clare's Nursing Home. Open space along roadside at boundary with Albert College residential estate. No tree preservation orders or protected views are present. The following protected structures are present: No. 3508 Cuilín House, Albert Cottages and outbuildings (within Albert College Park). No. 3510 Hampstead House.

9.191. Section 3 which encompasses St. Mobhi Road and Botanic Road from Griffith Avenue to Hart's Corner is located within the outer suburbs centred on the outer suburban village of Glasnevin with Botanic Gardens to the west. The route at this location is a major suburban street flanked by two-storey and two-storey over basement, semi-detached and terraced residential properties. Development includes the Bon Secours Hospital, educational and sports grounds. The National Botanic Gardens, which are bounded by a fine stone wall backed by mature trees, are located to the west of Botanic Road at Glasnevin. Met Éireann Glasnevin, Our Lady of Dolours Church Glasnevin, and the former Player's Factory and boundary railing on Botanic Road are prominent local landmark features.

9.192. The routes passes the Botanic gardens and the Prospect Square / De Courcy Square and Environs ACA. There are no protected views or TPOs and protected structures along this section of the route include: No. 854 Botanic House and No. 855 former Player's Factory.

9.193. Section 4 which encompasses Prospect Road, Phibsborough Road from Hart's Corner to Western Way is located within the inner-city suburbs and is flanked by primarily residential with local retail, office and other mixed uses. Architecture and streetscape are of a generally good standard.

9.194. Amenity designations include open space at the Royal Canal and the lands pass through the Phibsborough ACA and a number of residential conservation areas. There are no protected views in this section.

9.195. Protected structures along this section of the route include; No. 2097 Railings, gates of former St. Vincent's Orphanage on Prospect Road; No. 6732 Former Mill Cross Guns Quay Royal Canal; a number of structures at Phibsborough Road / North Circular Road Junction; No. 6731 Church of Ireland, All Saints Parish Church, Grangegorman, and the adjoining former old schoolhouse, Grangegorman Schools, including boundary walls and gates; Terraces of houses at Phibsborough Road / Royal Canal Terrace, Broadstone; No. 2029 Broadstone Station terminal building, Dublin Bus Phibsborough garage. Curtilage buildings and features; No. 2030 Lodge to Kings' Inns and No. 2031 King's Inns: Railings, boundary walls and gate piers.

9.196. Section 5 which encompasses Constitution Hill and Church Street to Arran Quay which is located within the city centre. The area is characterised by wide urban streets predominantly of modern three, four, and five storey apartment and office development, interspersed with some original sections of streetscape, prominent church buildings and associated buildings, and a two-storey residential estate. Limited tree planting, with some trees in median along Church Street Upper.

9.197. Residential conservation areas are within the wider area. There are no TPOs. Protected Views include a number of structures along west side of Church Street, including, terrace to north of King Street North Junction, Memorial Hall, St. Mary of the Angels Church, Nos. 143 and 144, St. Michan's Church, and 1 Arran Quay. Coleraine House and Public Records Office on east side.

9.198. Section 6 encompasses Finglas Road from St. Margaret's Road to Tolka Valley Road and comprises of an outer predominantly two-storey residential suburb, centred on outer city village of Finglas. The route in this section is a dual carriageway flanked by larger commercial sites, 4 and 5 storey modern residential apartment blocks to either side. Amenity designations include Mellowes Park, St. Canice's Square, open spaces in Finn Eber and along Finglas Road at Finglas Village and Erin's Isle GAA Grounds.

9.199. Protected Structures include No. 8734 King William's Ramparts, No. 1554 St. Canice's Church of Ireland. Church, No. 1552 Ruined church, graveyard and stone cross (St. Canice's Square) Nos. 8729 / 8730 Barrack Lane (cottages) and No. 4849 Woodlands Lodge, all to west of road. (Refer to Chapter 16 (Architectural Heritage) for full details). No. 4851 St. Canice's Catholic Church, No. 4850 Rose Hill House to east of road.

9.200. Section 7 encompasses Finglas Road from Tolka Valley Road to Hart's Corner (tie-in to Ballymun Section of Proposed Scheme), this area is located in the outer suburbs and is flanked by mixed use development but dominated by the Glasnevin Cemetery. Residential property in the area is generally 2 storey.

9.201. Amenity designations include open space along stream corridor at Glasnevin Downs, Tolka Valley Park, Clareville Grove, Claremont Lawns. Nationally significant Glasnevin (Prospect) Cemetery. This section runs along the boundary of the Prospect Square / De Courcy Square and Environs ACA.

9.202. There are no TPOs or protected views. Protected Structures are associated and located within Glasnevin Cemetery.

Potential Impacts

9.203. The potential for impacts to arise relate to both the construction and operational phase of the development. The applicant within section 17.4.1 of the EIAR has listed the key characteristics of the proposed development 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 open space landscaping.

9.204. Other impacts relate to the location of construction compounds on open space areas and within the existing road corridor at 6 separate locations, all of which are detailed in Section 17.4.1.3.7 of the EIAR.

9.205. In terms of the operational phase of the development, visual and landscape changes relate to the change in traffic movements, the provision of SUDs, the change to road surfacing, improvements and changes to public realm.

9.206. 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.

9.207. In the interest of conciseness, I will examine the potential impacts relevant to each of the seven sections of the scheme individually hereunder and will briefly summarise the findings of the EIAR in this regard. It is important to note however that 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. I refer the Board to table 17.7 and 17.8 in which a summary is provided outlining all of the potential construction and operational impacts and the associated magnitude of effects.

- Ballymun Road from St. Margaret's Road to the South of Ballymun District Centre (Gateway Avenue) – landscape/ townscape of low sensitivity - minor alterations to streetscape proposed – magnitude of effects is therefore negative, slight and temporary.
- Ballymun Road from the South of Ballymun Town Centre (Gateway Avenue) to the South of Griffith Avenue) – landscape/ townscape of medium sensitivity - minor alterations to streetscape proposed - magnitude of effects is therefore 'negative', 'moderate' and 'temporary'.
- St. Mobhi Road and Botanic Road from Griffith Avenue to Hart's Corner - landscape/ townscape of high to very high sensitivity – proposed works will alter

historic road corridor running through primarily established residential suburbs, removal of road boundaries particularly at the Formers Players Factory - magnitude of effects is therefore negative, very significant and temporary.

- Prospect Road, Phibsborough Road from Hart's Corner to Western Way - landscape/ townscape of high sensitivity - The Proposed Scheme will include for the construction of three new pedestrian / cycle bridges over the Royal Canal and the adjacent railway lines east of Cross Guns Bridge. The Proposed Scheme will also include the installation of a pedestrian / cycle underpass, under R101 North Circular Road, which will require re-construction of the section of R101 North Circular Road south of Phibsboro (Phibsborough) Library and lowering of existing ground levels within the open space on the former Blessington Canal spur north and south of R101 North Circular Road. The construction works will be extensive and will result in substantial changes to elements of the existing streetscape, including the removal of the existing Irish Volunteers Memorial statue, railings and trees - magnitude of effects is therefore 'negative', 'very significant' and 'temporary'.
- Constitution Hill and Church Street to Arran Quay - landscape/ townscape of medium sensitivity - minor alterations to streetscape proposed, removal of several trees at the open space fronting Constitution Hill Flats - magnitude of effects is therefore 'negative', 'significant' and 'temporary'.
- Finglas Road from St. Margaret's Road to Tolka Valley Road - landscape/ townscape of low sensitivity – works will include alterations to streetscape in relation to kerbs, resurfacing etc which is common to all sections to the route and will remove trees and other planting - magnitude of effects is therefore 'negative', 'slight' and 'temporary'.
- Finglas Road from Tolka Valley Road to Hart's Corner (tie-in to Ballymun Section of Proposed Scheme) - landscape/ townscape of medium to high sensitivity - minor alterations to streetscape proposed - magnitude of effects is therefore 'negative', 'slight' and 'temporary'.

9.208. It is clear from the foregoing that the two main areas of significance in terms of changes to the streetscape relate to the proposed bridge over the Royal Canal and the relocation of the boundary treatment at the Former Players Factory. Whilst these

works will provide for a change in the streetscape at these locations, I am satisfied that the changes are not sufficiently negative as to warrant a refusal of the development. The works to the Former Players Factory site will merely relocate the boundary treatment slightly further back into the site and the proposed bridge will provide a safe and vastly improved cycle and pedestrian environment over the Royal Canal in an area which is densely development with a wide range of buildings flanking the canal on both sides.

9.209. In terms of surrounding ACAs, I note that the proposed scheme proceeds through the Phibsborough ACA and the removal of mature and semi mature trees in this area will impact the visual amenity and setting of this area, however on balance the proposed improved public realm and the significant improvements to cycle and pedestrian infrastructure at this location outweigh the loss of these trees. New trees will be introduced in this area and as such impacts will not be permanent.

9.210. The applicant has examined the potential for impacts to arise in relation to areas identified within the Dublin City Development Plan as conservation areas and residential conservation areas and I note that no significant impacts are expected to arise in this regard.

9.211. I have reviewed the operational phase impacts and note that the operation of the development will not give rise to significant visual or landscape impacts along the route.

9.212. The Proposed Scheme will require permanent land acquisition from four residential properties: Nos. 34, 36 and 38 Bengal Terrace; and Daneswell Place (under construction). There will be permanent loss of property due to the relocation of the roadside boundary walls and railings and entrances gates, together with the loss of areas of existing garden lawn within the permanent land acquisition areas. However, the areas of land lost will be relatively minor in relation to the overall garden areas. The magnitude of change for the properties with permanent land acquisition will be medium.

9.213. In addition, the Proposed Scheme will require permanent land acquisition from a number of non-residential properties, including commercial properties:

- Scoil Chaitríona, St. Mobhi Road;

- CLG Na Fianna Sports Ground, St. Mobhi Road;
- Home Farm Football Club pitch, St. Mobhi Road;
- Whitehall College of Further Education, St. Mobhi Road;
- 163 to 169 St. Mobhi Road (footpath areas in front of businesses);
- Botanic Business Centre (former Cahill Printers), Botanic Road;
- 21 / 22 Prospect Road;
- Forecourt area at The Bernard Shaw Public House, Prospect Road;
- Phibsborough Shopping Centre Car Park;
- Green Area at former service station at Slaney Road and Finglas Road Junction; and
- St Vincent's School, Finglas Road. T

9.214. The magnitude of change for the non-residential properties with permanent land acquisition will be medium.

Mitigation

9.215. 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.

9.216. No mitigation or monitoring is proposed for the operational phase of the development.

Residual Impacts

9.217. 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

9.218. 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 amenity 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 amenity 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.

Land, soil, geology and hydrogeology

9.219. Section 14 of the EIAR submitted addresses lands, soils, geology and hydrogeology.

Baseline Conditions

9.220. 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 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.

9.221. The Proposed Scheme is predominantly underlain by made ground over alluvium over glacial till over limestone bedrock.

9.222. 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. Alluvium and marine sediments are also present along the route mostly around the Tolka River and River Santry. Subsoils comprise glacial till for the most part with areas of gravels and shallow bedrock.

9.223. The underlying bedrock of the study area is predominantly comprised of the Lucan Formation (of carboniferous limestone). Excavations will not exceed 300mm in depth, reference to bedrock is therefore for context and not related to concerns relating to potential impacts. There are no karst features identified within the study area.

9.224. 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 petrol stations along the route, all are outlined within table 14.27 of the EIAR.

Potential Construction Impacts

9.225. 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.**
- Excavation of potentially contaminated ground – works resulting in exposure of contaminated material – magnitude of effects - **slight**
- Loss of future quarry or pit reserve – no notable existing or historic quarries with the study area – No impact**, imperceptible significance**
- Loss or Damage of Proportion of Geological Heritage Area **-** The land, soils and geology on a local scale will be negatively impacted by the construction of new pavements and structures along with Construction Compound F3 in the vicinity of the Glasnevin Cemetery CGS. However, as there are no intended works within the CGS, the magnitude of this impact will be **negligible.**
- Loss or damage of proportion of aquifer - minimal excavation into the limestone rock as part of the Proposed Scheme – magnitude of impact **negligible**
- Change to groundwater regime - Localised pumping of excavations could lead to change in groundwater levels – magnitude of effects – **imperceptible.**

Potential Operational Impacts

9.226. 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**.

Mitigation

9.227. 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 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.

9.228. Cumulative impacts have been considered in this regard and given the nature of the proposed works are considered to be unlikely.

Conclusion

9.229. 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.

Water

9.230. Section 13 of the EIAR submitted examines the potential for impacts to arise in relation to hydrology. As mentioned above the proposed route will follow the existing Ballymun and Finglas Roads from the city and lies within Hydrometric Area (HA) 09 (Liffey and Dublin Bay) and is within the River Liffey catchment. Relevant water body status is outlined within table 13.7 of the EIAR. It is of note from this table that the known status of the waterbodies encountered along the route range between poor and good, and all are at risk with pressures arising from urban wastewater. Very little SUDs measures are present along the proposed routes.

Baseline Conditions

9.231. The waterbodies examined for the purpose of EIA for the proposed scheme include the following:

- Santry_010;

- Tolka _ 050;
- Tolka _060;
- Royal Canal, and
- Liffey Estuary Upper.

9.232. Hydrological connections to the above waterbodies are via the sewer system and roadside gullies. A number of crossings which include the pedestrian/cycle bridge over the Royal Canal,

9.233. I draw the Board's attention to Appendix 13.1 of the EIAR which contains a Water Framework 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

9.234. 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.

- **Santry_010** - Construction Compound B1 will be located at Santry Cross there is a potential hydrological connection via drainage sewers, the Construction Compound is located 220metres from the river and overland runoff is therefore unlikely. Magnitude of effects - **Imperceptible significance**
- **Tolka_050 -** hydrological connection via drainage under compound and surrounding area- Magnitude of effects - **Slight significance**.
- **Tolka_060 -** Construction Compound B1 will be located at Santry Cross there is a potential hydrological connection via drainage sewers it is not clear from

drainage plans is the outfall is to the Santry as above or this section of the Tolka, other impacts relate to risk of pollutants entering the water course via drainage or - Magnitude of effects -**Significant to Slight**

- **Royal Canal Main line (Liffey and Dublin Bay) -** The proposed cycle / pedestrian bridge over the Royal Canal and the ramp down to Royal Canal Bank at Eglington Terrace has the potential to result in impacts on water quality. A risk of spills and leaching into the water during works can give rise to pollution events - Magnitude of effects range between **slight to significant** in the case of a hydrocarbon spill or leaching.
- **Liffey Estuary Upper –** pavement repair works will not cause significant impacts – magnitude of effects are stated to be of **Imperceptible significance.**

Potential Operational impacts

9.235. 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 into the proposed scheme along the entirety of its length where there are none at present. Such works will have a positive impact on the receiving waters surrounding the proposed scheme.

9.236. 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.

9.237. In addition, the proposed scheme will result in a loss of 65m of soft canal bank to accommodate the ramp and bridge, however in the context of the overall length of the canal I am satisfied that this loss will not be significant.

9.238. 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

9.239. The applicant has carried out a flood risk assessment for the proposed scheme, which is appended to the EIAR, it is important to note at the outset that a stage 2 FRA was not required as the development is in an area of low risk. 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.

Fluvial / Coastal Flooding:

9.240. The OPW flood maps show the Proposed Scheme will be outside the boundaries of the flood zones, and therefore, there will be no likelihood of flooding from this source.

Groundwater flood risk - Scheme falls into the 'Low' groundwater vulnerability categories.

9.241. As the Proposed Scheme is on existing roads with no known flooding specifically due to groundwater. It is not expected that this risk will increase to the site or surrounding areas due to the construction of the Proposed Scheme.

Pluvial Flooding

9.242. Whilst there is a risk of pluvial flooding along the proposed route, this risk will be reduced as a result of the drainage improvements of the Proposed Scheme.

9.243. 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.

Mitigation

9.244. Mitigation measures are outlined in section 13.5 of the EIAR and include measures 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. No residual significant negative impacts are therefore expected to arise.

9.245. I 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.

Biodiversity

9.246. 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

9.247. The lands within and adjacent to the development site are urban in nature with various sections of the route bounded by mosaics of landscaped habitats including hedgerows, treelines and amenity grassland. Amongst the urban-dominated habitats throughout the scheme amenity grassland associated with Balcurris Park will border the west of the Proposed Scheme. As the Proposed Scheme will approach Glasnevin and will extend south to Broadstone, residential areas and buildings and artificial surfaces will continue to dominate and feature mosaics of landscaping habitats including treelines amenity grassland, and scattered trees and parkland. Within a largely urban environment, freshwater habitats are present at the River Tolka and the Royal Canal crossings with associated areas of reed and large sedge swamps, treelines, and amenity grassland.

9.248. Habitats present at R135 Finglas Road include scattered trees and parkland, and broadleaf woodland adjacent to Bachelor's Stream. As the Finglas Section will extend southwards from the R103 Seamus Ennis Road crossroads, the dominant habitats will include residential development and buildings and artificial surfaces.

9.249. The Zone of Influence (ZoI) 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.

9.250. Air quality ZoI is set depending on the activity i.e 50 m from proposed scheme, 200m from construction compound during construction phases and 200m proposed scheme boundary or local road during the Operational Phase.

9.251. The ZoI for aquatic plant and animal species incorporates 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.

9.252. The ZoI 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.

9.253. ZoI 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 km.
- Breeding birds – ex-situ up to 300m.
- Amphibian species – direct habitat loss / indirect impact to water quality.
- Lizard – direct habitat loss and severance / displacement during construction.

9.254. Overall, it is clear that the determination of the zone of influence differs depending on the construction and operational activity.

9.255. It is important to note 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 site is South Dublin Bay and River Tolka Estuary SPA which is located c. 0.5km east of the Proposed Scheme. 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.

9.256. The closest nationally designated site to the Proposed Scheme is North Dublin Bay pNHA, which is located c. 0.4km east of the Proposed Scheme. All pNHAs within both the ZoI and the wider vicinity of the proposed scheme are listed within table 12.6 of section 12 of the EIAR. 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.

9.257. 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 between 2018 and 2020 with updated surveys carried out in 2022, details of all surveys are outlined in section 12.2.3 of the EIAR. 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: mammals such as badger (known to occur within 1km of the proposed scheme) and otter (the site is within foraging range for otter), breeding birds of conservation concern, common lizard, common frog or smooth newt. I also note that the Santry River is not a salmonoid river and there are no records of invertebrates such as white clawed crayfish, fresh water molluscs or marsh fritillary butterfly in the study area.

9.258. 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. In addition, it is important to note that works will occur during normal daytime working hours and at locations such as river crossing, and the Royal Canal will not be carried out at night. The applicant therefore states that the proposed works will therefore not impact the behaviour or foraging patterns of nocturnal mammals such as otter and badger.

Potential Impacts in relation to bats

9.259. Bat surveys have been carried (see details in section 12.3.8.1 of EIAR) with the following species recorded:

- Leisler's bat
- Common Pipistrelle
- Nathusius' pipistrelle bat
- Soprano pipistrelle

9.260. Leisler's bat, was recorded in three of the four locations surveyed between 2018 and 2021, at CBC0304BT002 (Albert College Park), CBC0304BT003 (St. Mobhi Road), and CBC0304BT004 (R108 Phibsborough Road). 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.

9.261. Common Pipistrelle was recorded in all four transects surveyed between 2018 and 2021, at CBC0304BT001 (Mellowes Park), CBC0304BT002 (Albert College Park), CBC0304BT003 (St. Mobhi Road), and CBC0304BT004 (R108 Phibsborough Road). T002 (Albert College Park), CBC0304BT003 (St. Mobhi Road), and CBC0304BT004 (R108 Phibsborough Road). A total of 99 recordings of this species were made in these locations between 2018 and 2020, with a total of 647 recordings of this species made during the July 2021 surveys at CBC0304BT004 (R108 Phibsborough Road), the majority of which were concentrated around existing lighting columns and Cross Guns Bridge. No roost sites for common pipistrelle bat were recorded during any of the surveys for the Proposed Scheme.

9.262. Nathusius' pipistrelle bat was recorded in one of the transects surveyed in 2021 at CBC0304BT004 (R108 Phibsborough Road). A total of five recordings of this species were made at this location all during the dusk survey on 13 July 2021. No roost sites

for Nathusius' pipistrelle bat were recorded during any of the surveys for the Proposed Scheme.

9.263. Soprano pipistrelle was recorded in two of the four locations surveyed between 2018 and 2021, at CBC0304BT003 (St. Mobhi Road), and at CBC0304BT004 (R108 Phibsborough Road). A total of 71 recordings of this bat species can be attributed to these two locations. No roosts were recorded.

9.264. Unidentified pipistrelle species were recorded in only two locations surveyed between 2018 and 2020, at CBC0304BT003 (St. Mobhi Road) and at CBC0304BT004 (R108 Phibsborough Road). A total of 14 recordings between 2018 and 2020 can be attributed to unidentified pipistrelle species.

9.265. One unidentified myotis bat was recorded at CBC0304BT003 (St. Mobhi Road) during surveys undertaken in spring 2020. This was the only Myotis bat detected within the locations surveyed, between 2018 and 2020. Twenty-five recordings of unidentified myotis bats were recorded at CBC0304BT004 (R108 Phibsborough Road) during surveys undertaken on 13 July 2021. It is stated that these bats among others are known to occur within 1km of this location.

9.266. The most significant trees with potential roost features identified were located near to St. Mobhi Drive. The Proposed Scheme will result in the loss of 5 no. trees with PRFs (Potential Roosting Features). The potential impact of the permanent loss of these trees is considered to be significant at a local geographic scale due to the relatively low number of bats likely to be utilising this PRF and the availability of other PRFs in the wider area.

9.267. In assessing the impacts of habitat loss as a result of fragmentation of foraging / commuting habitat on bat populations, consideration was given to a species Core Sustenance Zone (CSZ). A CSZ refers to the area surrounding a communal bat roost within which habitat availability and quality will have a significant influence on the 'resilience and conservation status' of the colony using the roost.

9.268. Having regard to the type of works proposed e.g. upgrading of existing infrastructure for the most part), it is stated that there is limited potential for the Proposed Scheme to act as a barrier to flight paths for bat species. The exception to this is the proposed bridge over the canal which will result in a loss of area along the canal for foraging bat populations.

9.269. In addition to the foregoing the removal of vegetation will occur within boundaries of the proposed scheme, however such vegetation will be within the road medians. This habitat removal is therefore within a highly disturbed urban environment with low numbers of bat 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.

9.270. Nonetheless it is proposed by the applicant that where practicable, habitats of importance to bats such as scattered trees and parkland, treeline and hedgerow habitat types, which lie within the footprint, or along the boundary of the Proposed Scheme, will be retained. It is also proposed to bolster such habitat with the planting of an additional 515 street trees, 2,478m of hedgerows, 71m^2 species rich grassland, 6884m2 of native planting, 3562m2 ornamental planting and 1969m2 of proposed amenity grassland planting.

9.271. An additional potential impact to bats arises from the introduction of lighting in the construction compounds. In order to prevent significant impacts to bats utilising this area, lights will be installed in a manner that directs light downwards and will be of a reduced intensity to reduce any potential impacts to bats.

9.272. With regard to the construction compound, it is of note that this facility will be located in within a heavily trafficked urban areas whereby bat species are habituated to light to a certain degree. Thus, given the limited numbers encountered, the absence of any roosts recorded and the environment in which the proposed development is located it is reasonable to assume that impacts to bats at this location will not be significant.

Mitigation in relation to Bats

9.273. Mitigation measures proposed include, pre-construction surveys, use of bat boxes where trees with PRFs are in existence these will be protected where practicable. The use of low lux directional lighting at compounds and at works areas, low level lighting where required and the use of sensor lights.

9.274. Overall, given the limited level of bat activity within the vicinity of the proposed works, the absence of any roost sites, the availability of suitable habitat within the vicinity of the works and the mitigation measures proposed above, I am satisfied that the proposed development adequately provides for the protection of bat species and is acceptable in this regard. The Board should note that the proposed works are to be

carried out in a highly urbanised environment whereby bat species are habituated to a certain level of noise and light disturbance. The proposed works would not alter the environment to such a degree as to have a permanent negative impact on bat populations in the area. 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.

Potential Impacts in relation to birds

9.275. It is important to note that the applicant has examined the potential for impacts to arise in relation to overwintering bird species within the Appropriate Assessment section of this report 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 the Appropriate Assessment above in relation to over wintering bird species. Nonetheless, it is important to note that the applicant has examined records of all overwintering birds relevant to the proposed scheme and has identified ex-situ feed grounds within 300m of the proposed scheme boundary. It is important to clarify at this juncture that there will be no loss of feeding habitat to overwintering birds as a result of the scheme.

9.276. Temporary disturbance could occur in relation to noise etc during the construction and could disturb foraging birds at locations such as the Na Fianna GAA Club and Home Farm Football Club. However, outside of the works at the Royal Canal, none of the construction works are expected to give rise to noise levels that would impact foraging birds within 300 m of the proposed scheme and as such no significant impacts are expected to these species.

9.277. All of the suitable foraging sites which are outlined in Section 12.4.3.5.2.2 of the EIAR have been surveyed and are examined in the AA above. The only permanent loss of habitat of any significance is at the proposed Royal Canal pedestrian / cycle bridge which will require the permanent removal of potential nesting habitat for mute swans, and other riparian bird species, which are known to breed in the vicinity of Cross Guns Bridge.

9.278. Suitable habitats for such species include areas of reed and large sedge swamp and bankside grassland vegetation. However, the area subject to direct habitat loss (i.e. approximately 7.75m2 in total area) forms a relatively small part of larger expanses of similar habitat types found along sections of the Royal Canal both upstream and downstream of the proposed Royal Canal pedestrian / cycle bridge.

9.279. Overall, I note that none of the habitat areas to be lost are unique to the locality and, the applicant states that either individually or collectively these areas are not likely to support a significant proportion, or the only population of any given breeding bird species locally.

9.280. Habitats for other common birds that are affected by the development form 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 are available in the wider locality of the Proposed Scheme. Impacts to birds in this regard are not expected to be significant.

9.281. Habitat loss in the general sense will arise along the full route and will occur in the form of permanent land take of edge habitats adjacent to the existing road network, or as temporary land take to facilitate construction activities. Such habitats are identified as being of Local Importance (Higher Value) and Local Importance (Lower Value). As mentioned above habitats impacted by the development are commonly found in urban settings and comprise of grass verges, trees, hedgerows, ornamental planting or scrub etc and given their location in highly trafficked urban areas are highly disturbed. Overall, considering all habitat types to be lost, their extents and the surrounding habitats beyond the Proposed Scheme boundary, I am satisfied that the potential impacts will not result in a significant effect at any local geographic scale.

9.282. In terms of disturbance, as mentioned above the proposed works are to be carried out within the carriageway and edge of carriageway, birds within this environment would be habituated to urban noise levels. The magnitude of impact is heavily dependent on the type of construction works to be carried out. It is recognised within the EIAR that works at the Royal Canal will create the most significant impact and the species to be most affected as mentioned above is the mute swan. However, as aforementioned the area over which disturbance / displacement effects will occur, form a relatively small part of larger expanses of similar habitat types in the wider locality of the Royal Canal (i.e. both upstream and downstream sections of the Royal Canal). As such, given the availability of suitable habitat in the wider locality of the Proposed Scheme, the construction works are therefore not likely to affect the conservation status of breeding mute swan and will not result in a likely significant negative effect, at any geographic scale.

9.283. Overall disturbance will be temporary as construction proceeds along the scheme and will not give rise to significant permanent effects.

Mitigation for Birds

9.284. Mitigation measures for the protection of birds is outlined in section 12.5.1.5 of the EIAR and relates to the following:

- Retention of vegetation where possible.
- Avoidance of the removal of habitat during breeding season, in the event that this is necessary pre works surveys will be carried out and works ceased if birds are encountered.
- Noise mitigation measures will be employed to prevent disturbance.
- Removal of screening vegetation adjacent to areas used by foraging over wintering birds will be carried out in September. This includes the area of vegetation removal along the boundary of R108 St. Mobhi Road and the Na Fianna CLG / Home Farm Football Club sports pitches.
- Protective fencing of vegetation close to works.

Potential Impact in relation to Aquatic species

9.285. 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.

9.286. With regard to the works at the Royal Canal, I note that the proposed works will result in localised narrowing of the canal at this point with instream works. The works will not result in severance of passage, nor offer a barrier, but will represent a permanent loss of a small area of canal habitat for coarse fish and eel. As in the case of birds utilising the canal, the area of loss and the temporary nature of disturbance will not signficantly affect local fish populations. No mitigation is therefore proposed outside of that relating to the protection of water quality.

9.287. The Board should note that in channel works will be carried out in a temporarily separated area to the canal. No impacts are expected from the operation of the development.

Potential Impacts in relation to Plant species

9.288. 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

9.289. Four non-native invasive plant species listed on the Third Schedule of the Birds and Habitats Regulations were present in five locations within, or in close proximity to the Proposed Scheme. In the absence of mitigation, there is potential for these species to spread or be introduced, during routine maintenance / management works, to terrestrial habitat areas in European sites downstream in Dublin Bay.

Mitigation for Invasive Plant Species

9.290. 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

9.291. The applicant has considered the potential for impacts to arise in relation to the operational phase of the development and I refer the Board to Section 12.5.2 of the EIAR in this regard. Overall, 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, a monitoring and management plan for invasive plant species, restricting the timing of vegetation removal to protect birds and ongoing monitoring of the site will prevent any impacts of significance from arising. I am satisfied that the applicant has adequately considered all potential operational impacts in detail.

Residual Impacts

9.292. 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.

9.293. In this context I draw the Board's attention to table 12.16 of the EIAR in which residual impacts are for the most part expected not 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.

9.294. Whilst I accept that the removal of vegetation can be identified has having a significant effect, I will consider the limited level of removal in the context of the significant replanting scheme proposed to be acceptable. The applicant has clearly stated that trees identified as having potential roosting features for bats will be retained (with the exception of the 5 mentioned above to be removed) and all trees will be inspected prior to felling to ensure no bats are present. In the case of the trees to be removed, bat boxes will be erected to mitigate against significant impacts arising in relation to bats.

9.295. In addition, whilst the river area adjacent to the proposed scheme is within foraging distance for otters, none were encountered. Preconstruction surveys will be undertaken to ensure that impacts do not arise. Similarly, no evidence of other protected mammals was recorded during surveys. In the absence of such species being recorded 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.

9.296. 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.

Conclusion

9.297. 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.

Material Assets & Waste

9.298. Section 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 an encompasses Dublin and the Eastern-Midlands.

Material Assets

9.299. All major infrastructure and utilities which may be impacted by the Proposed Scheme have been assessed including:

- Railway lines;
- The Royal Canal;
- Luas Green Line;
- Luas Red Line;
- Electricity;
- Water / Wastewater;
- Surface Water Drainage;
- Gas; and
- Telecommunications

9.300. 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

9.301. The Proposed Scheme will interact with several pieces of major infrastructure, namely two railway lines, the Royal Canal and two Luas lines. The Proposed Scheme will cross two railway lines just north of the Royal Canal at Cross Guns Bridge. The two railway lines are close to each other at the point where they will cross under the Proposed Scheme, the northern line being part of the Western Commuter Line and South Western Commuter Line which carries both intercity trains (Dublin to Sligo) and commuter trains, and the southern line being part of the Docklands spur of the Western Commuter Line and is only operational at peak times Monday to Friday.

9.302. The Proposed Scheme will cross the Royal Canal at Cross Guns Bridge, with a new pedestrian / cycle bridge over the Royal Canal proposed to the east of the existing bridge. The Royal Canal is mainly used for leisure activities, namely boating and angling within the waterway, and walking and cycling along the pathways running alongside it. The 5th Lock is located adjacent to Cross Guns Bridge.

9.303. The Proposed Scheme will cross both of the Luas lines. It will cross the Green Line on R108 Constitution Hill, close to the ‘Broadstone – DIT’ Luas Stop. The frequency of the Luas in this area can be as high as every three to four minutes at peak times in

each direction. The Proposed Scheme will then cross the Red Line on R132 Church Street between the Four Courts Luas Stop and the Smithfield Luas Stop. Again here, the frequency of the Luas in this area can be as high as every three minutes at peak times in each direction. This therefore is a high frequency service

9.304. A table listing all major utilities in the vicinity of the proposed scheme is outlined in table 19.5 of the EIAR and refers mainly to overhead lines and underground cables.

9.305. 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.

9.306. 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. The use of the Royal Canal and associated walkways may be interrupted temporarily to facilitate development of the new bridge.

9.307. 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.

9.308. The magnitude of effects arising from infrastructure diversions ranges between no significant impact to Negative, Moderate, Temporary. Impacts relating to each individual infrastructure element is outlined in table 19.11 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 imperceptible in this regard.

9.309. 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.

Mitigation

9.310. Mitigation in relation to material assets include the protection of existing infrastructure at the Royal Canal, protection of major utility and diversion if necessary and ongoing liaison with the utility providers throughout construction. In the event of service disruption, the public will be notified, and disruptions will be minimised in terms of duration. Materials will be sourced locally where possible. There are no mitigation measures proposed for the operation of the development as impacts are expected to be minimal during this phase of the development.

9.311. Residual impacts are not expected.

9.312. Overall, it is clear that the proposed scheme seeks to reduce the impact on material assets within the area and within the scheme itself and I am satisfied that the applicant has made adequate provisions to protect major infrastructure assets and reduce overall materials being brought into the site.

Waste

9.313. 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 Council.

9.314. It is important to note at the outset that impacts arising from waste are not deemed to be significant.

9.315. 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 19,000 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.

9.316. 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.

9.317. I have examined the waste estimates provided by the applicant and note the following in relation to construction waste:

- Estimates of demolition waste are outlined in table 18.8 of the EIAR and result in a total predicted amount of 1,220 tonnes which equates to 0.01% 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 91,000 tonnes is expected to be generated from the development which equates to 0.85% 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 (i.e can not be recycled or reused). Such levels of waste are standard in construction and as such are not expected to give rise to significant impacts in the regional context.

9.318. 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. It is important to note that the quantity of bituminous mixtures generated over the assumed lifetime of the Proposed Scheme (60 years), will decrease by approximately 1,186 tonnes due to an overall narrowing of the carriageway. Therefore, there will be a decrease in maintenance needs during operation of the Proposed Scheme. The magnitude of effects during the operation will therefore be positive, not significant and long term.

9.319. 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. The proposed development once operational will in fact reduce waste and therefore have a positive effect on waste quantities in the region.

Waste Mitigation

9.320. A construction and demolition resource and waste management plan has been prepared and it is stated that this will be implemented and include measures as follows:

- Stockpiling of existing subbase, capping layer and topsoil material generated on-site for direct reuse in the Proposed Scheme, where practicable, in the proposed Construction Compounds (subject to material quality testing to ensure it is suitable for its proposed end use); and
- Recycled aggregates and reclaimed bituminous mixtures will be specified in the Proposed Scheme, where practicable. For example, suitable recycled aggregates and appropriate site won material may be specified in the proposed road base / binder layers, subbase layers under footpaths / cycle tracks, and capping layer material within the road, footpath and cycle track pavement, subject to testing to ensure material is suitable for its proposed use.
- Source segregation: Metal, timber, glass and other recyclable material will be segregated (and waste stream colour coding will be used) during construction works and removed off site to a permitted / licensed facility for recycling;
- Material management: 'Just-in-time' delivery, where practicable, will be used to minimise material wastage;
- Any hazardous waste arising will be managed by the appointed contractor in accordance with the applicable legislation; and
- Waste auditing: The quantity and types of waste and materials leaving site during the Construction Phase will be recorded by the appointed contractor. The name, address and authorisation details of all facilities and locations to which waste and materials will be delivered will be recorded along with the quantity to each facility. Records will show material which is recovered, which is recycled and which is disposed of.

9.321. Overall residual impacts in relation to construction waste in terms of both the operational and construction phases following mitigation are not expected to arise. Having reviewed the relevant documents and chapters of the EIAR submitted I am satisfied that the applicant has adequately addressed waste arising from the development and has adequately employed the principles of the circular economy in this regard through the inclusion of waste materials within the project construction where appropriate and the reuse of existing materials along the route. Measures to reduce waste such as on demand delivery will further reduce waste during the

construction phase is in accordance with the key tenets of the Eastern Midlands Region waste Management Plan.

Conclusion

9.322. 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 avoided 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.

Risk of major accidents and / or disaster

9.323. An assessment of the risk of major accidents or disasters is outlined in section 20 of the EIAR. In terms of potential risks, it is noted that for the large part the proposed development has a low risk to major accidents or disasters. However, I note that there is a medium risk associated with the potential of striking a main gas line, spreading of invasive species and water contamination during construction.

Mitigation

9.324. Mitigation is proposed in this regard, an invasive species management plan will be implemented to prevent the spread of such plants, surface water management as outlined within the water section of this EIAR assessment will prevent the contamination of surface watercourse and an emergency incident plan will also be prepared and implemented in the event of an emergency.

Conclusion

9.325. Following mitigation, it is stated that the risk of such incidents occurring is low and no significant residual effects are expected in this regard. I considered all of the relevant contents of the file including the EIAR in relation to risk of major accidents or disaster. I am satisfied that the potential for impacts on major accidents or disaster 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 major accidents and 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.

Interactions between the Factors and Cumulative Impacts

9.326. Section 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:

- DCC planning reference 2628/17: extension to the existing Phibsborough Shopping Centre;
- DCC planning reference 3361/22: construction of 52 residential units within three apartments blocks ranging from three to eight storeys fronting both Church Street and Brunswick Street North;
- ABP reference 308905: 101 Apartments, Glasnevin Hill;
- ABP reference 309345: An application for Strategic Housing Development at Old Bakery Site, 113 Phibsborough Road.
- ABP reference 310722: An application for Strategic Housing Development on Finglas Road;
- Major Project (ID MP08) - DART+ Programme West;
- Major Project (ID MP14) - Finglas LUAS (Green Line extension Broombridge to Finglas); and
- Major Project (ID MP32) - MetroLink.

9.327. In regard to DCC planning reference 2628/17, Finglas LUAS (Green Line extension Broombridge to Finglas) and MetroLink, the assessment of cumulative effects has identified potential for cumulative impact on land take (and accessibility) on population receptors. However, given the limited interface in respect to the overall length of the

Proposed Scheme and the wider community, such impacts are not anticipated to be significant.

9.328. 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.

9.329. It is important to note at the outset that for the large part no significant adverse cumulative impacts are expected. All cumulative impacts are outlined in detail within Section 21 of the EIAR and whilst I will not repeat all of the information hereunder, I will have considered the full details of this chapter in my assessment of the cumulative impacts. It is important to note at the outset that cumulative impacts in relation to human health are considered in the long term to be positive, significant.

Water, soils, geology and hydrogeology

9.330. 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. It is of note however that the applicant considered 32 other projects in relation to cumulative impacts arising in relation to water I refer the Board to section 21.3.1.8 of the EIAR in this regard for further detail but note overall that impacts are predicted to be not significant.

Traffic

9.331. 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.

9.332. In order to prevent such significant impacts from arising, the applicant has stated that a number of routes will not be constructed simultaneously as follows:

- Ballymun/ Finglas to City Centre Core Bus Corridor Scheme – will not be constructed concurrently with Swords and Blanchardstown Schemes;
- Lucan to City Centre Core Bus Corridor Scheme – will not be constructed concurrently with Liffey Valley and Blanchardstown Schemes;
- Templeogue /Rathfarnham to City Centre Core Bus Corridor Scheme will not be constructed concurrently with Kimmage and Bray Schemes; and
- Bray to City Centre Core Bus Corridor Scheme – will not be constructed concurrently with Blackrock/Belfield and Templeogue /Rathfarnham Schemes.

9.333. The remaining eight schemes, of which the current proposed scheme is one, 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.

9.334. MetroLink is a proposed high-capacity metro system that will run between Dublin City Centre and Dublin Airport, before continuing to Swords. It will run predominantly underground for most of the length parallel to the Ballymun Section of the Proposed Scheme between Phibsborough at the southern end and Northwood at the northern end. There will be interfaces between the two schemes at five locations (Northwood, Ballymun, Collins Avenue, Griffith Park and Glasnevin (Phibsborough) MetroLink stations), where underground stations will be located beside the Ballymun Section of the Proposed Scheme. The applicant has considered the cumulative impact of this scheme.

9.335. The DART+ West (a proposed railway corridor upgrade along the Dublin to Sligo line) and the DART+ Southwest (a proposed railway corridor upgrade along the Dublin to Cork line) projects converge and cross under the Ballymun Section of the Proposed Scheme at Phibsborough / Glasnevin. A new railway station will be constructed to the west of R108 Prospect Road as part of the development of a MetroLink station at a lower level where the north / south metro tunnel will pass beneath the east / west railway line that is in cutting just below ground level. The new Glasnevin Station will

provide an interchange point between the four major transport schemes - DART+ West, DART+ Southwest, MetroLink and the Proposed Scheme.

9.336. It is stated within the EIAR that the BusConnects Infrastructure team has considered the potential for spatial and temporal overlap with these major transport projects, and they have been considered in the traffic modelling undertaken. It is not considered that the development when taken in conjunction with the aforementioned projects would give rise to a temporal or spatial overlap that will give rise to significant cumulative impacts. It is envisaged that the Proposed Scheme will be constructed in advance of significant construction works on MetroLink in particular.

9.337. The applicant states that coordination with the development teams for both Metrolink and Dart +West has occurred and is ongoing to ensure that no conflicts arise. I am therefore satisfied that no significant cumulative effects will arise in relation to traffic and transport.

Dust and air pollution & Climate

9.338. 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.

9.339. 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, I am satisfied that no significant cumulative impacts are expected, the overall magnitude of impact is predicted as negative, not significant and short term.

9.340. 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 which are now provided for within the Climate Action Plan 2023. This issue has been discussed in detail above and will not be repeated hereunder. However, in the context of the proposed development as a whole 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

9.341. Cumulative impacts in relation to Noise and vibration have been examined in the context of the proposed 12 routes and the developments listed above. Due to the distance between routes, cumulative impacts in relation to the other proposed routes are not expected. Other major infrastructure projects could directly interface with the construction of the Proposed Scheme and a total of 33 projects have been identified within the 300 m zone of influence of the proposed scheme and considered in the context of cumulative noise impacts. Given that the proposed scheme will dominate the noise environment at the nearest noise sensitive location as construction proceeds along the route, I am satisfied that cumulative noise impacts will not arise in this instance.

9.342. In relation to construction noise, I note that under the cumulative construction traffic scenario, the magnitude of impacts are reduced along roads impacted as a result of the Proposed Scheme in isolation, and impacts are increased along a small number of additional roads as result of the cumulative construction scenario. This is due to alternative traffic management measures in place during the cumulative schemes' construction scenario compared to the standalone Proposed Scheme. Five roads in total will experience cumulative traffic noise impacts in the cumulative scenario, all impacts are temporary in nature.

9.343. I note from other BusConnects applications it has been proposed to liaise with contractors of other projects to ensure that there is coordination between projects and no significant cumulative impacts arise, this is a reasonable response to noise monitoring and should the Board be minded to grant permission, I recommend a condition is imposed in this regard.

Biodiversity

9.344. Cumulative impacts to biodiversity relate to habitat loss and degradation, 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.

9.345. Cumulative impacts arising from other developments referred to above within the vicinity of the site could result in relation to bats, however I note that impacts will be no higher than the already predicted residual effects significant at the local geographic scale for the Proposed Scheme alone. Similarly for birds, impacts will be local in scale and not significant. The removal of trees will be compensated by the replanting program proposed as part of the scheme, any potential impacts will therefore be temporary in nature.

9.346. 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, even cumulatively with any future projects that might be proposed.

9.347. In relation to fish it is expected that the proposed development will not result in any cumulative impact.

Archaeology & Architectural Heritage

9.348. The archaeological and cultural heritage assessment did not identify any projects with the potential to give rise to cumulative effects during construction. This was because works associated with other projects within the ZoI for archaeology and cultural heritage can and will be archaeologically mitigated for. Taken in conjunction with the Proposed Scheme, no significant cumulative impacts have been identified.

9.349. In terms of architectural heritage, I note that the applicant has considered cumulative impacts in the context of the following:

- Major Project (MP08) - DART+ Programme West;
- Major Project (MP012) - DART+ Programme South West;
- Major Project (MP32) - MetroLink; and
- Major Project (MP34) - Cycling: Greater Dublin Area Cycle Network Plan (excluding Radial Core Bus Corridor elements).

Landscape and Visual

9.350. The landscape (townscape) and visual assessment identified 37 other projects with the potential for likely significant cumulative effects with the Proposed Scheme during construction. The landscape (townscape) and visual assessment identified the potential for temporary in-combination indirect townscape / visual effects to occur if construction periods coincide / are successive for 25 other projects. Such effects are likely to be localised and contained within the local townscape area, due to the enclosing effect of the surrounding built form. It is stated that for 22 of these projects' effects are likely to be localised Moderate and Temporary / Short-Term during construction in the local area.

9.351. As a result of cumulative tree loss at locations affected by the Dart + West the magnitude of predicted impacts are moderate and temporary. The applicant has also had regard to Metrolink and states that cumulative impacts will be most notable at locations of the proposed Metro stations between Glasnevin and Ballymun with an expected magnitude of moderate and temporary also.

9.352. For the remaining three other projects of the 25, due to the enclosing effect of the surrounding built form and enclosed nature of railway cuttings at the closest points to the Proposed Scheme, the potential townscape / visual effects are likely to be localised Slight and Temporary / Short-Term cumulative construction effects in the local area:

- DART+ Programme South West;
- Finglas LUAS (Green Line extension Broombridge to Finglas); and
- LUAS Cross City incorporating LUAS Green Line Capacity Enhancement - Phase 1.

9.353. It is of note that the Blanchardstown route will not be constructed concurrently with the proposed scheme to avoid cumulative impacts on the local intervening townscape around Smithfield, interconnecting roads, the Liffey Quays and other local receptors.

9.354. Other cumulative impacts whereby no significant impacts are expected relate to waste and material assets I refer the Board to Table 21.2 of the EIAR in which regional projects in relation to cumulative waste impacts are outlined.

9.355. Having regard to the very detailed information provided by the applicant in relation to cumulative effects, I am satisfied that a robust assessment of all cumulative impacts has been carried out and I am satisfied based on the information submitted that the proposed development will not give rise to any significant cumulative effects.

Interactions

9.356. 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.

9.357. 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 Section 21 of the EIAR which I have considered.

9.358. 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.

9.359. Similarly human health and biodiversity can interact with Air Quality, noise & 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. A number of trees and grassland are to be removed as part of the scheme; however these works will be temporary in that trees will be replanted and grass areas reseeded.

9.360. 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.

9.361. Interactions also occur between Landscape (Townscape) & Visual, Architectural Heritage, Archaeology and Cultural Heritage. The Construction Phase will have impacts on a number of local features of heritage value, Conservation Areas, historic street furniture etc. Excavations may interact with archaeology, but this would be restricted to the construction phase of the development. Having regard to the mitigation measures proposed by the applicant in this regard I am satisfied that significant interactions will not arise.

9.362. 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.

10.0 Recommendation

10.1. I recommend that permission is granted subject to the following conditions.

11.0 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 2023
- National Development Plan

- National Planning Framework

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
- Fingal County Development Plan 2023-2029
- Dublin City Biodiversity Action Plan 2021-2025.
- Greater Dublin Area Transport Strategy – 2022-2042
- Sustainable and Smart Mobility Strategy 2020 (EU Commission 2020)
- Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009 – 2020
- Department of Transport National Sustainable Mobility Policy on 7th April 2022.
- Design Manual for Urban Roads and Streets, 2019
- 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, including the proposed offshore element of the development,
- 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
- the submissions made to An Bord Pleanála in connection with the planning application, and
- the report and recommendation of the Inspector, including the examination, analysis and evaluation undertaken in relation to appropriate assessment and environmental impact assessment.

11.1. **Proper Planning and Sustainable Development**

11.2. 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:

The Board agreed with and adopted the screening assessment and conclusion carried out in the inspector's report that the Baldoyle Bay SAC, North Dublin Bay SAC, South Dublin Bay SAC, Howth Head SAC, Howth Head Coast SPA, Skerries Islands SPA, Rockabill SPA, Lambay Island SPA, Ireland's Eye SPA, North Bull Island SPA, South Dublin Bay and River Tolka Estuary SPA, Malahide Estuary SPA, Baldoyle Bay SPA, Rogerstown Estuary SPA, Dalkey Islands SPA, The Murrough SPA, North West Irish Sea SPA, Rockabill to Dalkey Island SAC and Lambay Island SAC are the European sites for which there is a likelihood of significant effects.

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

i. Mitigation measures which are included as part of the current proposal,
ii. Conservation Objective 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 site's 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.

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 CO_2 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 signficantly small percentage of the sectoral emission ceilings outlined in CAP 23 for the 2021-2025 carbon budget period, the proposed development represents 0.00967% 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 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.

11.3. 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.

12.0 **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. Prior to the commencement of development at each section of the proposed works, pre-construction surveys shall be carried out to determine the presence of protected mammal, bird or bat species.

   Reason: In the interest of environmental protection

4. Prior to the commencement of works the contractor shall install a plastic chute with internal corrugations or ladder on the downstream face of the 5th Lock Gate. This shall be carried out under the supervision of an appropriately qualified Ecologist and inspected at regular intervals to be determined by the Ecologist for the full duration of works at this location.

   Reason: to protect and facilitate commuting otter.

5. Proposed kerb height differentials between footpaths, cycleways and bus lanes shall be retained in perpetuity.

   Reason: In the interest of maintaining the proper functionality of the scheme.

6. In accordance with the EIAR, all works shall be monitored by an Ecological Clerk of Works or Ecologist. Where appropriate, monitoring shall be specialists. Monitoring schedules shall be included in Site Specific Habitats Protection and Re-instatement Method Statements.

   Reason: In the interest of environmental protection

7. Prior to the commencement of development the location and duration of use of the proposed construction compound shall be agreed with Dublin City Council and the use of this compound shall not conflict or impede the delivery of consented

housing at this location. The applicant shall relocate the proposed compound should a conflict arise.

Reason: In the interest of orderly development.

8. In accordance with the EIAR, 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 Local Authority to be held on file. The Architectural Conservation Specialist shall ensure that adequate protection of the retained and historic fabric during the proposed works and across all preparatory and construction phases. Discovery of new architectural heritage shall be made known to the Conservation Section of Dublin City Council as soon as is practicably possible.

   Reason: In the interest of environmental protection

9. Noise monitoring shall be carried out at all times during the construction phase of the development. In the event of exceedances all relevant works shall cease until appropriate mitigation is implemented.

   Reason: In the interest of environmental protection and public health.

10. Water supply and drainage arrangements, including the attenuation and disposal of surface water, shall comply with the requirements of the relevant planning authority for such works in respect of both the construction and operation phases of the proposed development.

    Reason: In the interest of environmental protection and public health.

11. 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.

12. Construction works will be undertaken in accordance with best practice and relevant guidance to prevent any deterioration of water quality and disturbance to

bird species, as set out in the preliminary CEMP. These measures will be integrated in full into the final CEMP by the eventual contractor as a means of effective implementation of all measures. This plan shall provide details of intended construction practice for the development, including hours of working, noise management measures, surface water management proposals, the management of construction traffic and off-site disposal of construction waste.

Reason: In the interests of public safety, protection of ecology and residential amenity.

13. 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 Local Authority. Such monitoring information shall be provided in a report to the Local Authority on a weekly basis.

    Reason: In the interest of orderly development.

14. Prior to the replacement of trees, hedging and planting which is to be removed the NTA shall agree with the relevant landowner the species, size and location of all replacement vegetation. The NTA shall also employ the services of an appropriately qualitied arboriculturist and Landscape Architect for the full duration of the proposed works to ensure landscaping and tree works are implemented appropriately.

    Reason: In the interest of visual and residential amenity.

15. 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

16. All details of soft landscaping shall be submitted to the Local Authority prior to implementation.

    Reason: In the interest of orderly development.

17. Details of all signage shall be submitted to the Local Authority prior to the commencement of development to be held on record.

    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 interest 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 with the EIAR 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. (a) All lighting shall be operated in such a manner as to prevent light overspill to areas outside of compounds and works areas.

    (b) Prior to the commencement of development, the applicant shall submit a detailed lighting plan to be held by the planning authority. The plan shall include the type, duration, colour of light and direction of all external lighting to be installed within the site compounds of the development site.

    Reason: In the interests of clarity, and of visual and residential amenity and protection of local biodiversity.

21. Prior to the commencement of development, the applicant shall submit an Invasive Species Management Plan to the local 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 interest of nature conservation and mitigating ecological damage associated with the development.

22. Trees to be felled shall be examined prior to felling and demolition to determine the presence of bat roosts. Any works shall be in accordance with the TII Guidelines for the Treatment of Bats during the construction of National Road Schemes.

    Reason: In the interest of wildlife protection.

23. The developer shall ensure that all plant and machinery used during the works should be thoroughly cleaned and washed before delivery to the site to prevent the spread of hazardous invasive species and pathogens.

    Reason: In the interest of the proper planning and sustainable development of the area.

24. No ground clearance shall be undertaken and no vegetation shall be cleared during the bird breeding season, unless otherwise agreed with the local authority.

    Reason: In the interest of local biodiversity

Sarah Lynch
Senior Planning Inspector

27th November 2023

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.

Appendix I - Third party submissions

1. Aidan Power

Submission relates the concerns raised by a number of residents from Cremore Crescent.

- Traffic will be routed past three schools – St. Mary's HFC, Old Finglas Road, St. Brigid's GNS Old Finglas Road and Glasnevin Educate Together, Griffith Avenue.
- This diversion will impact the safety and health of school children and is contrary to the Climate Action Plan.
- Congestion on Griffith Avenue has signficantly increased due to westbound traffic reduced from 2 lanes to 1 and adjustments to traffic lights at the intersection with Ballymun road.
- A rat run has developed to Ballymun road via St. Canice's road, the proposed plan will result in a diversion along that route and impact another school – Schoill Chiaran St. Canice's road and Sacred Heart BNS, St. Canice's road.
- One way southbound will result in greater congestion at the junction of Old Finglas Road and Mobhi Road.
- Reversing the flow northbound of the city would mitigate these issues.
- Diversion creates pinch points at Glasnevin hill and Cremore Villas which will actually disincentivize large populations of users from using bus routes 23, 24 and N2. (No OH)

2. Ann Moynihan – 1018(1) 1e (CPO SUB)

- Owner of Reddy's Pharmacy
- No objection in principle
- Proposal will devalue the property.
- Proposal will restrict the potential to change use of the unit to a coffee shop without outdoor seating.
- Objection to the provision of a bus shelter at this location, request for this to be removed.

3. Anna Bourke - 1018(1) 1e (CPO SUB)

- Employee at Reddys Pharmacy
- Objects to Bus stop due to impacts to wheelchair users, elderly, people with poor vision and those with poor mobility.
- Proposed footpath is too narrow and will force people onto the cycle lane.
- Deliveries will be impacted.
- A section of 2 metres of path way will be available to park.
- Proposal will result in loss of income as pharmacy will not be easily accessible.
- No details have been provided in relation to accommodations to be provided.

4. Annette Murphy

- Concerns relating to impact of diverted traffic.
- It is contended that the development will increase congestion around schools.
- There is only one left turn off the dual carriageway to the Old Finglas Road for 3/4km.
- Old Finglas road is a concrete surface and not fit for purpose it was never intended as a main artery.
- Use of cement road will increase noise pollution in the area and air pollution will increase.
- Alternative routes should be considered.

5. Annemarie & Ciaran Rogers

- Property at 2 Ballymun Road.
- Concerns are raised in relation to car parking and the removal of spaces for residents. All remaining spaces should be pay and display for residents.
- It is requested that 2 spaces are made available to residents and details of same are required.
- Justification of road narrowing at Ballymun and Church Road is requested. This element of the scheme is considered to be unnecessary.
- Request for NTA to meet with residents.

- Clarification as to whether emergency vehicles have two-way access on road.
- Details in relation to tree retention on Old Ballymun Road are requested.

6. Caitriona O'Brien – Ballygall Road East residents

- Concerns relating to lack of engagement.
- EIA does not adequately address impact to Ballygall Road East or the side estates such as Glasilawn Avenue and Road, Tolka Estate and Griffith Road which will have increased traffic.
- Option A will lead to longer journeys. Congestion is already an issue at peak times at Ballygall Road East and Fitzmaurice Road due to the traffic lights at the junction of Fitzmaurice Rd and Ballygall Rd East and schools in the area.
- Northbound peak traffic will fan out through surrounding roads, increasing road safety concerns for elderly and school children.
- Termination of bus at Arran Quay will increase commute times for people as it is not the city centre.
- Arran Quay is not safe at night and not easy to access.
- Concerns are raised in relation to emergency access to the nursing homes in the area.

7. Beyond the Junction

This groups states to represent independent business owners and residents, the submission relates to the section between Cross Guns Bridge (Hart's Corner) to the quays.

- General support for scheme
- Air Quality – assumptions do not take into account daily peaks. Proposal will worsen air quality.
- Traffic and facilities for Buses and Cyclists are outdated. Diverts traffic from main route to village.
- Need for wider footpaths.
- Impacts to biodiversity through loss of green areas
- Impacts to climate change as a result of more road space.

8. Bill Reddington - 6 Cremore Road

- Old Finglas Road is a bottle neck
- Concerns are raised in relation to the diversion of traffic from the bus gate at St. Mobhi Road and associated congestion.

9. Brendan Heneghan

- Bus journey time savings.
- Bus lanes and cycling facilities at Church Street, continuous cycle lanes are recommended to the north quay.
- Bus Gate on St. Mobhi Road.
- Interactions with Blanchardstown CBC.
- Lack of consultation – did not observe the Aarhus Convention.

10. Cabra Park Residents Association (Samir Eldin)

- The Proposed Scheme is generally welcomed, especially the proposed urban realm improvements at Cross Guns Bridge and the underpass at North Circular Road.
- Concern about linkage from the western side of Phibsborough to the Royal Canal Bank cycle route, including from Cross Guns Bridge to Leinster Street North
- Desire for more biodiversity with suggestions for additional planting on Phibsborough Road from Cross Guns Bridge to Leinster Street, and at the junction of Church Street and Chancery Street.
- Request for higher quality paving on from both sides of Phibsborough Road from Connaught Street to Leinster Street.
- It is noted that some cyclists will wish to use the bus lanes through Phibsborough and that appropriate signs should make clear that this is legitimate.
- Accessible ramp is required between North Circular Road and Royal Canal Bank Park.
- Enforcement of bus lanes is required.

11. Carmel Sherry - 18 Mannix Road

- Diversion of traffic from the bus gate at St. Mobhi Road.
- Need for traffic lights at the junction of Botanic Avenue and Botanic Road.
- Segregation between pedestrians and cyclists.
- Cycle Lane beside the Botanic Gardens.
- Navigation clearance under the proposed footbridge over the Royal Canal.

12. Carola Reynolds - 10 St. Mobhi Road

- Concerns relating to bus stop at front of property.
- Bus stop will cause obstruction for vehicles entering and leaving property.
- Increase in footpath width required.

13. Ciaran & Laura Byrne - 100 St. Mobhi Road

- Objection to southbound bus lane at southern end of St. Mobhi Road.
- Objection to cycle tracks beside the footpaths at southern end of St. Mobhi Road, area is too narrow.
- Restriction of right-turn eastbound on Botanic Avenue onto St. Mobhi Road southbound should be permitted for local access only.
- Risk to trees on Southern end of St. Mobhi Road

14. CIE

- Plot 1025 (1)
- Biodiversity garden and advertising displays should be incorporated into design.

15. Collette D'Arcy, Residents of Tolka Estate

- Concerns relate to the diversion of traffic from the bus gate at St. Mobhi Road.

16. David & Annette Ryan & others

- Concerns are raised in relation to lack of communication.
- Diversion of traffic from the bus gate at St. Mobhi Road.
- One-way southbound traffic restriction on Ballymun Road south.

- Prevention of right-turn from St. Canice's Road to Ballymun Road.
- Queries about the proposed changes to the traffic system at the junction of Griffith Avenue:
    - a) Is southbound traffic on St. Mobhi Road allowed to turn right onto Griffith Avenue. If so, how is that to be accomplished?
    - b) Eastbound traffic on Griffith Avenue and southbound traffic on Ballymun Road will be competing for very limited space in the traffic lane at the southern end of the junction to continue their journey on Griffith Avenue.
    - c) How will the right hand turn at the northern end of the junction for traffic wanting to travel eastwards on Griffith Avenue be managed?
    - d) How will city bound traffic travelling east on Griffith Avenue access St. Mobhi Road? If traffic turns north onto Ballymun Road, we feel that this could become a chokepoint and block the one general lane of northbound traffic.
- Bus route to the city centre.

17. David Kerins & Nicola Callaghan, 34 St. Mobhi Road

- Lack of consultation.
- Documentation is too cumbersome.
- Discrepancies on drawings.
- Sharing of footpaths with cyclists not appropriate.
- Bus stop and shelter.
- Bus Gate will not work.
- Cycle tracks beside the footpaths on St. Mobhi Road.
- Risk to trees on St. Mobhi Road.

18. Declan & Audrey Dempsey, 6 Cremore Crescent

- Support for changes to Griffith Ave, bus gate and cycle lanes.
- Concerns are raised in relation to increases in traffic and road safety for all users.
- Requested that Glasnevin end of the Old Ballymun road is kept two way for traffic.

- Increase in traffic will impact schools in area.

19. Deirdre Dalton, 97 Tolka Estate & Patrick, Rita and Louise Hanlon, 104 Tolka Estate

- Objection to the Bus Gate on Mobhi Road.
- Diverted traffic will be forced onto road which are not suitable.
- Diverted routes are not being upgraded and are already congested and will further impact services such as schools and health care facilities. These routes are not within the red line of the application boundary.

20. Dublin Commuter Coalition

- Concerns regarding island bus stops and conflicting with pedestrians.
- Some bus stops should be relocated, and some are too close together.
- Metro link interchange in Phibsborough will have no cycling infrastructure.
- The submission list's locations where cycle lanes and bus lanes are missing.
- No on street parking in Ballymun Main Street should be provided.
- A bus gate should be provided at Doyle's Corner.
- Objection to the removal of green space at Claremont Lawns/Finglas Rd.

21. Dublin Cycling Campaign

- Concerns in relation to junction design and lack of cycle infrastructure from side routes.
- Lack of clarity on plans in particular lack of cross sections.
- No integration with Greater Dublin Area Cycle Network.
- Without modifications the project will not deliver a modal shift.
- Left turning with traffic instead of pedestrians will result in collisions.
- Unproven junction designs will put people at unnecessary risk, Dublin junction design will mean cyclists cross junctions at the same time as traffic.
- Planted green buffers are recommended between traffic and cycle lane.
- Lanes should be 2/2.25m
- Links to housing in the west are proposed.

- Alternative routes are proposed for quiet street routes.
- Query regarding junction design at Church Street.
- Concerns regarding cycle track widths.

22. Glasilawn Area Tolka Estate Active Group

- Lack of adequate communication
- EIAR does not adequately address impact to Ballygall Road or side estates.
- Closure of Ballymun road to traffic will exacerbate traffic congestion.
- Termination at Arran Quay is inconvenient.

23. Glasnevin Avenue Residents Association

- Lack of adequate consultation.
- Closure of Ballymun road to traffic will exacerbate traffic congestion.
- Concerns are raised in relation to increases in traffic and road safety for all users and schools.

24. Glasilawn Environmental Group

- Principle of scheme supported.
- Lack of adequate consultation.
- Closure of Ballymun road to traffic will exacerbate traffic congestion.
- Lack of adequate communication
- EIAR does not adequately address impact to Ballygall Road or side estates.
- Closure of Ballymun road to traffic will exacerbate traffic congestion.
- Termination at Arran Quay is inconvenient.

25. Glasilawn Residents Group

- Principle of scheme supported.
- Lack of adequate consultation.
- Closure of Ballymun road to traffic will exacerbate traffic congestion.
- Concerns are raised in relation to increases in traffic and road safety for all users and schools.

26. Glasilawn Road Residents Association

- Lack of adequate communication
- EIAR does not adequately address impact to Ballygall Road or side estates.
- Closure of Ballymun road to traffic will exacerbate traffic congestion.
- Termination at Arran Quay is inconvenient.
- Concerns are raised in relation to increases in traffic and road safety for all users and schools.

27. Glasnevin Village Residents Association

- Enforcement is critical.
- Illegal parking in the village must be eliminated.
- Traffic calming in village required.
- Ensure homeowners can access driveways at new bus stop locations.
- Concerns over proposed new bus stop at 85 Mobhi Road opposite existing bus stop.
- Timing for Mobhi bus gate should be reconsidered to avoid excessive traffic in village.

28. Griffith Avenue and District Residents Association

- Proposed development is premature pending the metro-link, bus routes should be fed into it and not laid on top of it.
- Impacts of diversions has not been assessed.
- Impacts arising from loss of rights of way have not been adequately considered.
- Footpath widths along Mobhi Road will be too narrow at 1.8 metres.
- Project is flawed due to heavy reliance on island bus stops.
- No evidence of consideration of cumulative impacts arising in relation to Metro-link.
- Objection to the removal of mature trees at boundary of Na Fianna.
- Cost benefit does not make sense giving the improvement to journey times will be 4 seconds.

- Current application does not protect the health of commuters.
- It is requested that the section of route is delayed until after the delivery of the Metro Link.
- The proposal does not cater for the needs of people with additional needs.
- Consultation does not accord with Aarhus Convention and the process was not inclusive for all, in particular the elderly.
- Change in bus routes will impact elderly residents of the area.
- Refuse bins will block paths due to restricted widths.
- Speed limit on Mobhi Road should be reduced to 30kmph.
- Concerns relating to surface water drainage from temporary construction.
- Realtime information is required for bus arrivals and departures.

29. Iona and District Residents Association

- Timing of works for both the proposed project and the Metro-link to be as short as possible.
- Long term traffic management solution to protect against future traffic challenges.
- Number of rat runs identified in submission and speeding is a concern along these routes as drivers break speed limits.
- Road signs are also ignored.
- Parking on footpaths impedes access.
- Traffic calming in the Iona District for the duration of the project works is requested.

30. Jean Keogh – 69 Ballymun Rd.

- Concerns relating to consultation process.
- Third party states that there has been insufficient time to collect information.
- Requests and Oral Hearing.

31. John Deegan & Nóirín Finnegan - 32 Saint Mobhi Road

- Lack of clear and open communication, lack of understanding as to how proposal will impact the area.

- Audit of footpaths has not been undertaken.
- Walking infrastructure is not first in terms of hierarchy within the scheme.
- Conflicting information in relation to removal of green areas on Mobhi Road.
- Any raised barrier between footpath and cycleway will be a trip hazard.
- Residents have to reverse out of driveway which will mean reversing onto cycle path.
- Real time bus information will mean less of a need for bus shelters.
- Proposed bus shelter at 34 to 36 Mobhi Road will give rise to a negative visual impact.
- Objection to the removal of high value trees.
- Discrepancies in arborist documents.
- Acquisition of lands at Scoil Caitríona, Nan Fianna CLG and Home Farm is excessive and not required.
- Enforcement of bus gate.
- Oral Hearing is requested.

32. John Keoghan – 26 Clareville Road

- Objection to car park beside house.
- Bus will be closer to house, concerns about noise.
- Green space is used all of the time.

33. John Lillis

- Lack of consultation.
- Increase in traffic on Ballygall road has not been assessed.
- Arran Quay is not convenient.
- Bus connects routes should be staggered in terms of construction periods.

34. Katherine Kelliher Blessington court

- Objects to removal of trees and the removal is not shown on general arrangement drawing.
- Pedestrian crossing outside Botanic Gardens is needed.

- Retain pedestrian area at Botanic Avenue and Botanic Road, this area is congested.

35. Kathleen Cuffe

- Concerns in relation to width of road and footpaths and the potential for accidents to occur.
- Proposal will not improve situation on Mobhi Road.
- Loss of trees.
- Long term plan needs to be developed to get people out of cars and onto public transport.
- Proposal on Mobhi road does little to improve commute times and has a large impact on residents.
- Lights to be moved to Mobhi Road and Botanic Avenue.

36. Kevin & Helen Summons Walsh – 94 old Finglas road.

- Closure of lower part of old Ballymun road will create traffic congestion.
- Solution is to make Ballymun road one way northwards.
- Proposal diverts traffic past three schools.

37. Kevina McGill

- No consideration of traffic impacts on surrounding roads.
- EIAR does not consider impact to surrounding roads.
- Increase in traffic to St. Pappins Road and other roads outlined in submission.
- No reference to construction of metro and cumulative impact arising from the proposed scheme and the metro.
- Concerns over consultation.
- Termination of bus service in Arran Quay is inconvenient.

38. Lesley Hewson & others

- Access to Prospect ACA is problematic.
- Cycle way shared with footpath will give rise to accidents.

- Will proposed bridge widening to allow for two-way cycle way and new bus. stop at Prospect Road be a permanent feature after Metro-link.
- Concern in relation to two way cycle lane.
- Public

39. Louise Rainford

- Increase in traffic through Glasnevin
- Increase in pollution
- Diverted routes pass schools which are on the NTA's safe route to schools program which conflicts with bus connects.
- Diverting traffic past schools is contrary to the Governments ambition in the climate action plan.
- Adjustments to traffic lights have resulted in a rat run to Ballymun Road.
- One way changes to Ballymun Road will increase congestion.
- The direction of the one way should be altered to a northward direction.

40. Maeve O'Neill

- Traffic Congestion
- Loss off on street
- Blocking of north bound traffic will exacerbate congestion further.

41. Margaret McDonnell & Kieran Smyth & Others

- No consideration to current crime rates in EIAR.
- Antisocial behaviour from crowds congregating at bus stops.
- Objection to purchase of land at Albert College Estate / Ballymun Road.
- Use of DCU parking to facilitate the loss of on street parking.

42. Marie Sherlock

- Concerns relating to cumulative impact of Metro Link and Busconnects.
- Concerns relating to air pollution.
- Restrictions of Mobhi road will increase congestion.
- Concern over shared space cyclists on Royal Canal bank cycle path.
- Containment of future rats runs.

- Maintenance of Broadstone pocket garden.
- Ecological management plan and ecological oversight.

43. Martina Creaven

- Congestion
- Lack of site notices
- Concerns regarding quality of life

44. Mary & Brian Lambert

- Refers to 2-16 Ballymun road
- Residents to be issued with a tag for two-way access along Ballymun road.
- Trees should remain
- Pay and display parking only shown for a number of properties.
- Green corridor should be provided for movement from Harts corner to Ballymun.
- Issues relating to incorrect labelling on plans in relation to Sheet 23 being incorrectly indicated on sheet 3 layout of the 08 Traffic signs and markings layout.

45. Mary Fitzpatrick

- The consideration of Metrolink and Busconnects at the same time is difficult for residents and an oral hearing is requested to consider the project in detail.
- Griffith Avenue to Ballymun section should only be considered after the consideration of Metrolink.
- Provision for loading and unloading along the route should be provided.
- Island bus stops should be accessible to disabled users.

46. Maureen Smyth

- Concerns relating to one way system on Mobhi Road and the resultant congestion, it is suggested this should reverse morning and evening.
- Segregation of pedestrians and cyclists is requested.

47. Neasa Hourigan

- Concerns raised in relation to the accessibility of bus islands.
- Clarity regarding parking protected cycle lanes.
- Submission refers to the issues raised within the Beyond the junction submission.
- Street parking to the east of Cremore Villas is protected as residents.
- Concerns about diverted traffic through Cremore villas.

48. Niamh & Ger Davis

- Diverted traffic will pass three schools, concerns are raised about safety.
- Air pollution increases.
- Reliance on Griffith Avenue is short sighted.
- Plan fails to incentivise bus use.

49. Our Lady of Victories Girls National School.

- 45% of students arrive to school on foot or bicycle, 87% of parents that drive park in school grounds. This will become unsustainable when Metro link is under construction.
- Concerns are raised in relation to traffic congestion and cumulative impact of Metro Link.
- Continual movement of buses outside of school is not compatible with the safe operation of the school.
- Concerns relating to disruption to services at school which will impact children's education.
- Permitting the development will put the staff and pupils' lives at risk.
- Concerns relating to impacts to outdoor learning arising from construction activities.
- Construction will impact children with sensory processing issues.

50. Pat Rooney

- Concerns raised in relation to lack of appropriate consultation.
- Plans do not match from ABP to Busconnects website.

- Congestion.
- Impact to accessibility of house.
- Current cycle lanes around Griffith Avenue are not used.
- Impact to local business.
- Objection to removal of trees.
- No direct bus to airport

51. Paul McAuliffe & others

- Objects to CPO and opening of wall adjacent to 117 North Road due to antisocial behaviour.
- Concerns relating to consultation process.
- Clarity requested in relation to northbound traffic an whether times can be altered without planning permission.
- Proposal will increase congestion on other roads.
- Concerns relating to safety of children commuting to school.
- Cumulative impact of Metro Link.

52. Paul McLoughlin & Emma Costello

- Diverted traffic will pass three schools, concerns are raised about safety.
- Air pollution increases.
- Reliance on Griffith Avenue is short sighted.
- Plan fails to incentivise bus use.

53. Peter & Ann Dore

- Concerns over width of road and capacity to adequately provide proposed additional lanes.
- Objection to cycle lane moving from off road to on road.
- Impact to trees.
- Proposed bus lane is mot value for money.

54. Philip Lynch & others

- Objection to bus gate

- Concerns relating to increase in traffic as congestion is currently significant.
- Two way should remain at Glasnevin end of Old Ballymun Road.
- Additional traffic will impact quality of life and lead to more 'rat runs' through estates.
- School bus service should be improved.
- Walking to school should be encouraged.

55. Ray Lynn

- Concerns that current congestion levels will increase with development.
- Objection to one way works on Mobhi Road.

56. <u>Residents of Tolka Estate</u>

- Overall support for scheme
- Concerns relating to increase in traffic as congestion is currently significant.
- Child safety concerns
- Deter older generation from using car.
- Ballymun rod should stay open for bus gate to work.

57. Richard & Susan Dunne & Colette Casey

- Recent traffic alterations
- Concerns relating to further congestion as a result of the development.
- Lack of consideration for impact to Glasnevin in terms of cultural and archaeological significance.
- Accuracy of drawings questioned as a 6-7 story building was permitted at Glasnevin Hill where parking spaces are indicated on map.

58. Roisin Shorthall.

- Overall support for project.
- Concerns relating to traffic congestion and the exacerbation of this by the scheme.
- Parking to be retained for businesses on Triangle at Ballymun Road.
- Lack of consultation with disability or older persons groups.

- Bus Islands are dangerous to vulnerable users.
- Objection to reduction in pavement widths.
- Parking issues at hospital etc. create congestion in village, additional park and rides at outskirts of city should be provided.
- Off street parking at Botanic Gardens to be provided
- Improve enforcement.

59. Sean & Natalie L'Estrange

- Query the distance between residents wall and cycle track,
- Clarification required in relation to trees.
- Concerns relating to access onto Mobhi Road.
- Travel time to access property will increase.
- Third party will have to reverse out on to road from property.

60. Sindy & Noel Fitzpatrick

- Objects to walkway at 117 North Road due to current antisocial behaviour.
- Move opening to end of road where opening already exists**.**

61. St Vincent's Basketball Club

- Club encourages members to use active travel to access the club.
- Lack of connected routes to club.
- Cyclist should not share road space with buses nor footpaths with pedestrians.
- Prioritisation of cyclists at signalled junctions.
- Buffers to be provided between general traffic and cyclists.
- Cyclops junctions should be provided.
- Cycle lanes should be more than 2 metres wide.
- Implementation of 30km speed limit.
- No protection for cyclists at Doyle's Corner.
- Traffic reduction and reduction in air pollution needs to be addressed in development.
- Current route from St. Margaret's needs to prioritise cycling.
- Oral Hearing requested.

62. Tesco

- Tesco has two stores along the route.
- CPO to Phibsborough Shopping centre will result in loss of 35 parking spaces and potential to impact deliveries.
- Need for parking is acknowledged in Retail Planning Guidelines.
- There is no option within the area to cater for this loss of parking and as such the commercial viability of the anchor store is questionable.
- Clarification is requested in relation to CPO.
- Left turning for deliveries must be retained.
- In relation to clearwater shopping centre, concerns are raised in relation to the removal of the left turning slip lane onto the Finglas Road.
- Inclusion of guide lanes markings for HGVs.
- Softening of kerb radius of the junction ensuring that junction is widened and a reduction in the central median.
- In relation to Ballymun Distribution centre it is requested that works do not prohibit the safe access and egress of this centre.

63. The Cremore Residents Association.

- Recently permitted developments will increase traffic in Glasnevin.
- Works on Mobhi Road will significantly impact congestion in surrounding areas.
- One-way northwards should be permitted.
- Traffic will be rerouted past residents on the Old Finglas Road and Cremore Villas and will cause congestion around schools.
- Impact of congestion on emergency response times.
- Increase in air pollution.

64. The Residents of Albert College Lawn

- General support for scheme
- Concerns regarding bus stop 37 island.
- Safe level crossing across cycle lane is required.
- Air and noise pollution.
- Parking for construction workers.

- Antisocial behaviour.
- Loss and damage to trees.
- Objection to opening of the cul de sac on Albert College Lawn onto Ballymun Road.
- Objection to an alternative route which opening Albert College Lawn/Ave onto the access avenue into DCU in front of no. 16 for motor traffic.

65. Wadelai Hillcrest & District Resident Association

- Inadequate Consultation
- EIAR should assess impacts to surrounding roads where traffic will be diverted to.
- Bus Gate on Mobhi Road will create diversion to other routes and impact communities and create rat runs.
- Increase in traffic to St. Pappins Road and other roads outlined in submission.
- Termination of bus service in Arran Quay is inconvenient.

Appendix II Prescribed Bodies

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.
- The proposal has been considered in relation to the core strategy of the Dublin City Council Development Plan.
- The Council will not comment on the acceptability of the EIAR.
- Ballymun Local Area Plan – development is in accordance with movement policies contained therein. Attention is drawn to the proposed east west link within this plan, and it is requested that the development does not jeopardise the delivery of this infrastructure.
- Ballymun main street should be treated consistently for its full length.
- There should be adequate parking to serve commercial developments along the main street.
- Tree colonnade should be extended.
- The proposed development will deliver on a number of objectives within the Finglas Strategy 2021.
- 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 development does pass through the Phibsborough conservation 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 signficantly contributing towards climate action.

- Overall strong support for proposed scheme.
- Scheme will remove bicycles from bus lane and therefore improve speed of bus service.
- DCC 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.
- Scheme should seek to maintain existing footpath where possible and seek to improve pedestrian connectivity to bus stops.
- Where cycle lanes move behind bus stops and car parking areas, measures should be put in place to slow cyclist down.
- NTA should undertake a substantial awareness campaign and behavioural change programme.
- Queries in relation to a number of locations such as parking at school inside the bus lane, interaction of all road users at the metro interchange, junction design at Church street, left turn slip of luas lane on Church street to be reviewed, purpose of yellow boxes on bus lane, safety of cycle crossing on Finglas Road.
- A liaison group is recommended between DCC, TII, NTA and construction contractors.
- Changes to parking at commercial units is proposed, adequate set down for deliveries should be provided at these premises and changes to parking and road markings should be agreed with DCC.
- Position of verges should permit drainage from both the footpath and the cycleway.
- Rationale for single and two way lane on Griffith Avenue to be clarified.
- Junction of Prospect way with Botanic Road is overly complicated.
- Bus island at Lindsay Grove is narrow and will result in passengers disembarking onto the cycle way.
- Two-way cycle track merges with footpath at Whitworth Road, this is not acceptable.
- Merging of cycle lanes and bus lanes is considered unnecessary.
- The submission outlines a number of locations whereby cycle lanes make conflict with footpaths.

- All drainage works should be agreed with DCC and clarifications are sought in relation to a number of locations.
- Scheme to ensure protection of receiving waters.

Archaeology

- Scheme passes through the zone of archaeological constraint for recorded monuments DU018-020 Historic City.
- Conditions recommended.

Conservation

- Route runs through the Prospect/De Courcy Square ACA, new bus shelters will impact character of ACA, location appropriate design is required.
- Route also runs along part of St. Canice's Square Conservation Area. Similar issues raise to that above.
- Cumulative impact of additional signage and street furniture should be
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- Relevant conservation policies are outlined.
- CPO will affect the railings of the Players Factory RPS 855, care to be taken to ensure works do not affect setting of RPS.
- Setting of Westmoreland Bridge RPS 8807 will be impacted by new bridge which appears overly bulky.
- Works to front of Phibsborough Library RPS 8884 will result in removal of railings.
- Concerns are raised in relation to bus shelters near to Glasnevin Cemetery.
- All protected structures in vicinity of works should be adequately protected.
- Care should be taken in relation to works within or adjacent to other non protected structures and historic landscapes included on the National Inventory of Architectural Heritage such as lands at former Stormanstown House, Church of Our Lady of Victories, Dean Swift Bridge, historic steps at from Broadstone Park to North Circular Road to name a few.
- Impact to Structures on the Dublin City Industrial Heritage Record Survey – sub surface elements of Wad Bridge, Finglas Bridge/Tolka Bridge,
- Adequate protections during construction are required for historic street furniture, cobbles setts, surfaces and lamp posts.

- Where kerb stones are to be removed, they should be integrated into works and protected.
- Where trees are to be removed, they should be replanted.
- Where boundary treatments are to be removed they should be set back and all details of same should be agreed with the DCC Conservation Officer.
- Red tarmac to be replaced with a more appropriate surface in ACA.

City Architect

- Overall support for project.
- Footpaths to be of sufficient width, concerns are raised in relation to Mobhi Road.
- Drawings are not of a sufficient scale to determine proposed public realm improvements.
- Access to NCBI should not be restricted for visually impaired.
- Additional details are required in order to assess impacts to the Phibsborough library – main access route from North Circular Road is to be removed, alterations to this section of the works are proposed.
- Removal of 23 trees along Constitution Hill will remove an effective noise barrier, the replacement with Silver Birch is not acceptable as this species will not provide adequate noise buffering.
- Scheme should consider retention of lime trees at Kings Inn.
- Bus Shelters design should be considered in relation to ACAs and impacts to footpath widths.
- Additional details in relation to materials and street furniture palette is required.
- Drinking water fountains should be included in scheme.
- Query omission of raised tables at some locations.

Constitution Hill Regeneration Project

- This project will deliver 49 homes in 2025 & 76 homes in 2027.
- Construction compound identified by Bus Connects is in the location of a new housing block.
- To facilitate construction of Constitution Hill it has been agreed that all existing residential traffic will access the site via St. Catherine's Lane, the northern

entrance will be solely for construction traffic and the location of this compound in this area will cause issues for traffic management.

- The location of this compound should be reconsidered in the context of this redevelopment.

Parks Department

- CAD drawings were requested from NTA by this section and were not provided. Drawings are not of sufficient size to see detail.
- Due to lack of details, it is not possible to comment accurately.
- Details of replacement trees is required.
- Trees indicated for retention will not be retained due to works at and near to roots. A tree bond is recommended.
- Concerns in relation to underpass at Phibsborough Library – under pass will signficantly impact the existing park and will create an area for antisocial behaviour due to lack of surveillance.
- Lack of detail in relation to SUDs.
- Photomontages do not reflect plans in terms of landscaping.

Department of Housing, Local Government and Heritage - DAU

- Impacts to Otter around the new pedestrian bridge and cycle bridge across the Royal Canal downstream of Cross Guns Bridge in Phibsborough, concerns are raised in relation to the movement of otters in this area and the cumulative effect of works together with other infrastructural projects that will be developed at the same time. Facilitating otter movement is essential, it is recommended that a plastic chute with internal corrugations or ladder is placed on the downstream face of the 5th Lock Gate.
- 5 trees to be removed contain features suitable for bat roosts, removal of these trees should be carried out under supervision and a bat box provided in its place.
- Development and works should be carried out in a manner which prevents any deterioration of water quality of adjacent rivers, standard conditions recommended.
- No objections outlined I relation to archaeology, standard conditions recommended.

Inland Fisheries

- Royal Canal supports significant populations of coarse fish.
- Tolka supports Atlantic Salmon, Lamprey and brown trout.
- Adequate protections are required during construction through environmental construction management planning.
- Any dewatering of excavations must be treated by overland infiltration or attenuation area.
- Guidelines on protection of fisheries during construction should be consulted.
- Crossing of canal must include fish passable structures, preferably in clear span design.