An Bord Pleanála

Inspector's Report

ABP-317742-23

Development	BusConnects Bray to City Centre Core Bus Corridor Scheme
Location	Bray, Co. Wicklow to Dublin City
Planning Authorities	Dublin City Council, Dún Laoghaire-Rathdown County Council, Wicklow County Council
Applicant	National Transport Authority
Type of Application	Applications under the provisions of Section 51 (2) of the Roads Act 1993, as amended (Strategic Infrastructure Development (Road))
Prescribed Bodies	Dublin City Council Dún Laoghaire-Rathdown County Council Wicklow County Council Department of Housing, Local Government & Heritage Transport Infrastructure Ireland
Observers	See Appendix A and B
Date of Site Inspection	14th February 2024, 20th June 2024, 2nd September 2024, 30th September 2024
Inspector	Tomás Bradley

Contents

1.0 Introduction 1

2.0 Administrative Matters 2

2.1 Timeline of Application 2

2.2 Pre-Application Consultation 2

2.3 Oral Hearing 3

2.4 Further Information 3

2.5 Site Visits 3

2.6 Notes for Reader 4

3.0 Site Location and Description 5

3.1 Description of the Route 5

3.2 Description of the Location 6

4.0 Proposed Scheme 8

4.1 Development Description (High Level) 8

4.2 Development Description (Detailed) 9

4.3 Development Need 14

4.4 Development Objectives 14

4.5 Documents supporting the Proposed scheme 15

5.0 Planning History 17

6.0 Policy Context 18

6.1 European 18

6.2 National 19

6.3 Regional 24

6.4 County 27

7.0 Legal Context 42

7.1 Environmental Impact Assessment 42

7.2 Appropriate Assessment 42

8.0 Submissions 44
8.1 Planning Authorities 44
8.2 Prescribed Bodies 47
8.3 Observations to SID Application 48
9.0 Planning Assessment 58
9.1 Principle of the Development 59
9.2 Detailed Design 62
9.3 General Design 109
9.4 Adequacy of Consultation 129
9.5 Conclusion 131
10.0 Environmental Impact Assessment 134
10.1 Consideration of Alternatives 136
10.2 Assessment of Topics 146
10.3 Cumulative Impacts 220
10.4 Transboundary Effects 222
10.5 Interactive Impacts 222
10.6 Reasoned Conclusion 225
11.0 Appropriate Assessment 228
11.1 Receiving Environment 229
11.2 Screening for Appropriate Assessment (Stage 1) 231
11.3 Appropriate Assessment (Stage 2) 236
11.4 Appropriate Assessment Conclusion: Integrity Test 260
12.0 Overview of Conditions 262
13.0 Recommendation 266
14.0 Reasons and Considerations 267

Tables

Table 1: Timeline of Application 2
Table 2: Classified Roads included within the site 5
Table 3: Description of the route within the site 5
Table 4: Description of the route within the site 6
Table 5: Summary of Changes as a result of the Proposed Scheme 9
Table 6: Description of the route within the site 10
Table 7: Policies and Objective of the Regional Spatial Economic Strategy 24
Table 8: Transport Strategy for the Greater Dublin Area 2022-2042 26
Table 9: Policies and Objective of the DCDP 29
Table 10: Zoning Objective of the DCDP 30
Table 11: Natural Heritage Policies and Objective of the DCDP 31
Table 12: Site Specific Natural Heritage Policies and Objective of the DCDP 31
Table 13: Built Heritage Policies and Objective of the DCDP 31
Table 14: Site Specific Built Heritage Policies and Objective of the DCDP 31
Table 15: Policies and Objective of the DLRCDP 34
Table 16: Zoning Objective of the DLRCDP 36
Table 17: Natural Heritage Policies and Objective of the DLRCDP 36
Table 18: Site Specific Natural Heritage Policies and Objective of the DLRCDP 36
Table 19: Built Heritage Policies and Objective of the DLRCDP 37
Table 20: Site Specific Built Heritage Policies and Objective of the DLRCDP 37
Table 21: Policies and Objective of Others Plans and Schemes 38
Table 22: Policies and Objective of the WCDP 39
Table 23: Policies and Objective of the BLAP 40
Table 24: Zoning Objective of the BLAP 40
Table 25: Natural Heritage Policies and Objective in County Wicklow 40
Table 26: Site Specific Natural Heritage Policies and Objective 41

Table 27: Built Heritage Policies and Objective in County Wicklow..... 41
Table 28: Site Specific Built Heritage Policies and Objective 41
Table 29: Number of Submissions (2023) 49
Table 30: Number of Submissions (2024) 50
Table 31: Quantity of Trees to be Removed..... 109
Table 32: Surveys Undertaken..... 230
Table 33: Sites for which the likelihood of significant effects cannot be ruled out... 233
Table 34: AA Summary Matrix 238
Table 35: Surveys Undertaken..... 259

Appendices

Appendix A: Observations of October 2023

Appendix B: Observations of July 2024

1.0 Introduction

The National Transport Authority (NTA or 'the applicant') have made an application to An Bord Pleanála (the Board) under Section 51 (2) of the Roads Act 1993, as amended (Road Development (RD)) for approval of a road development scheme (RD) for the construction and operation of the Bray to Dublin City Centre Core Bus Corridor (CBC) Scheme ('the proposed scheme') for the purposes of facilitating public transport. The road development scheme is commonly referred to as 'BusConnects'. The proposed scheme is one of twelve such BusConnects schemes within the Dublin area.

The proposed scheme has an overall approximate length of 18.5 km.

The proposed scheme consists of the development of transport infrastructure primarily related to improving for buses, cyclists and pedestrians including:

- pedestrian crossings which will increase by 60% from 106 to 170;
- segregated cycle facilities will increase from 47% to 91%;
- bus priority measures will increase from 69% to 99.6%.

2.0 Administrative Matters

2.1 Timeline of Application

For clarity, the following dates are noted:

Table 1: Timeline of Application	
Date	Detail
3rd March 2021	Pre-Application Consultation Request Opened
12th August 2021	Pre-Application Consultation Closed
4th August 2023	Roads/CPO Application Lodged
10th October 2023	Last Date for Submissions/Observations
1st November 2023	The Board requests the applicant to respond to Submissions / Observations by 28th November 2023
24th November 2023	Applicant requests the Board give extension of time for response to Submissions/Observations until 29th March 2023
27th November 2023	The Board approves extension of time for response to Submissions / Observations until 29th March 2023
15th January 2024	Inspector makes Oral Hearing Recommendation
21st February 2024	The Board defers Oral Hearing Direction until submission from Applicant is received.
25th March 2024	Applicant requests the Board give extension of time for response to Submissions/Observations until 24th May 2024.
29th March 2024	The Board approves extension of time for response to Submissions/Observations until 24th May 2024
24th May 2024	The applicant provides response to Submissions / Observations
4th June 2024	Inspector updates Oral Hearing Recommendation
10th June 2024	Oral Hearing Direction Issued by the Board
17th June 2024	The Board advises observers of Oral hearing Direction and requests the observers to respond to by 15th July 2024
15th July 2024	The Observers provide response to Applicant's Submission of 24th May 2024

2.2 Pre-Application Consultation

The Board and the NTA held pre-application consultations (ABP-309584-21) under section 51A of the Roads Act 1993, for the development of twelve standalone BusConnects schemes in Dublin. A total of four pre-application consultation meetings took place between the Board and the prospective applicant on the following dates:

- 21st April 2021
- 20th May 2021
- 10th June 2021
- 29th June 2021

The pre application discussions were closed on the 12th of August 2021. The Board gave advice to the NTA regarding the procedures involved and what considerations relating to the effects of the proposed scheme on the environment or the proper planning and sustainable development may have on its decision in relation to the application.

A determination in relation to whether the project is strategic infrastructure development or not is not required under the Roads Act.

2.3 Oral Hearing

There was several requests for an oral hearing to be held in respect of the proposed scheme in submissions made by observers in October 2023. However, it was decided that no Oral Hearing be held as directed by the Board on the 10th of June 2024 and instead observers were given the opportunity to make another written submission.

It is noted that in submissions received before the 15th of July 2024, many observers again requested that the Board reconsider this direction and proceed to hold an oral hearing. However, I am satisfied that the Board's direction remains appropriate and written evidence has allowed for a proper and full assessment of the case without recourse to an oral hearing. It is considered that there is no issue arising that lacks clarity or detail or are so complex as to require a hearing.

The holdings of an oral hearing is, if course, entirely at the discretion of the Board.

2.4 Further Information

On the 24th of May 2024, the applicant provided a response to observations and objections and as noted above, third parties had a further opportunity to consider the NTA's responses and submit further written comments if deemed necessary. This information was received before the 15th of July 2024.

On the basis of all the information received from the applicant and observers, it was considered there is no issue arising that lacks clarity or detail or are so complex as to require Further Information be requested from the applicant or indeed the observers and the applications can be satisfactorily assessed based on the information provided.

2.5 Site Visits

The site was visited on several occasions and by different modes of transport given the nature of the proposed scheme. These occurred on the following dates:

- 14th February 2024 (by motor car),
- 20th June 2024 (by pedal bike),
- 2nd September 2024 (by public bus),

- 30th September 2024

It should also be noted that Google Street View was relied on and supplemented the site visits given it provides an accurate photographic record of the majority of the site. Most photography on Google Street View dates to 2023. It is noted, however, that certain locations date to 2017. All locations were ground truthed on site visits.

2.6 Notes for Reader

Please note that throughout this report, the proposed scheme is considered from north to south for consistency and legibility. This aligned with the information submitted by the applicant in the planning particulars.

When describing the scheme, reference is also made to:

- ‘inbound’ or ‘northbound’ - in the direction of St Stephen’s Green, Dublin City.
- ‘outbound’ or ‘southbound’- in the direction of Bray, Co. Wicklow.

3.0 Site Location and Description

3.1 Description of the Route

The proposed scheme consists of construction of bus, cycle and pedestrian infrastructure and has an overall length of approximately 18.5 km. The site makes up an arterial urban route between Dublin City Centre and the south and east of the Dublin Metropolitan area. It also makes up a wider inter-urban route to settlements in the south-east of Ireland in counties Wicklow and Wexford.

It incorporates the following classified roads set out in Table 2.

Table 2: Classified Roads included within the site		
Road	From	To
R138 Regional Road	St. Stephen's Green	Mount Merrion Av., Co. Dublin
N11 National Primary Road	Mount Merrion, Co. Dublin	Loughlinstown, Co. Dublin
R837 Regional Road	Loughlinstown, Co. Dublin	Shankill, Co. Dublin
R119 Regional Road	Shankill, Co. Dublin	Cork Great, Co. Dublin
R761 Regional Road	Cork Great, Co. Dublin	Bray, Co. Wicklow
Note: The site also incorporates a number of roads, streets and lanes adjoining these primary roads.		

The proposed scheme is described in four sections as set out in Table 3.

Table 3: Description of the route within the site		
Section	Name	Description
1	Leeson Street to Donnybrook (Anglesea Road Junction);	The proposed scheme on commences St Stephen's Green East and continue to the junction of Leeson Street Lower and Earlsfort Terrace. The proposed scheme is routed along Leeson Street Lower and Upper, and Sussex Road. It continues along Morehampton Road and Donnybrook Road, through Donnybrook Village
2	Donnybrook (Anglesea Road Junction) to Loughlinstown Roundabout;	The on to the Stillorgan Road, serving the UCD Interchange via the Stillorgan Road Overbridge at Belfield. The route then continues on the Stillorgan Road (N11), which carries on to the Bray Road to Loughlinstown Roundabout.
3	Loughlinstown Roundabout to Bray North (Wilford Roundabout);	From Loughlinstown Roundabout it runs along the Dublin Road (R837) to St. Anne's Church and then continues south through Shankill village along the R119.
4	Bray North (Wilford Roundabout) to Bray South (Fran O'Toole Bridge).	It then passes through Wilford Junction and along the Dublin Road until it terminates on Castle Street in Bray, on the north side of the River Dargle crossing.
Note: The site also incorporates a number of roads, streets and lanes adjoining these primary roads.		

A full description of the precise roads, streets, lanes, junctions related to the proposed scheme is set out in Chapter 4 of the Environmental Impact Assessment Report (EIAR).

3.2 Description of the Location

The site of the proposed scheme is described below in terms of its characteristics in four sections.

Table 4: Description of the route within the site		
Sec.	Name	Description
Leeson Street to Donnybrook (Anglesea Road Junction);		
1		Between St Stephen's Green and Lesson Street Upper the area is characterised by four-storey buildings with continuous frontages with some pedestrian guardrails. This section includes a wide carriageway with minimal pedestrian crossing points. The end of Leeson Street Lower, at the canal, marks a threshold between the city street and inner suburban character. Eustace Bridge junction is a complex and busy area with multiple pedestrian and cycle crossings. This section at Leeson Street Upper and Sussex Road has an inner suburban residential character with a one-way gyratory. It includes a large central median on Leeson Street Upper with existing trees and a sculpture. Leeson Street Upper has significant pedestrian movements which reduce on the approach to Sussex Road. There are two and three-storey residential buildings along Leeson Street Upper and Sussex Road, with a small section of four-storey residential buildings along part of Leeson Street Upper. There are popular pubs, restaurants and a retail area at the junction with Sussex Terrace. Standard materials are applied to footpaths Between Leeson Street Upper to Wellington Place there are predominantly inner suburban residential in character with front gardens, hedges and mature street trees. It is dominated by vehicular movements with limited active frontages. There is a listed building in this section. Standard concrete materials are applied along footways On Morehampton Road the character is character with two and three-storey buildings with front gardens and hedges. Significant mature trees line this section of road on either side. There is some on street parking and footpaths consisting of poured concrete and concrete kerbs. A local retail area is well used near Herbert Park Junction. Donnybrook Road is a local retail centre with other mixed-use buildings. There are predominantly two and three-storey buildings, many offering active edges to the street. The wide carriageway dominates the area with limited pedestrian crossing points. Significant parking is provided along retail frontages. High quality mature trees make a significant contribution to the character to this area. Before Anglesea Road is an inner suburban mixed-use character area. Energia Park is a local landmark with a high boundary wall edge along Donnybrook Road. The road is relatively wide through this section with minimal urban realm amenity.
Donnybrook (Anglesea Road Junction) to Loughlinstown Roundabout;		
2		Between Stillorgan Road and Anglesea Road to UCD Campus Existing Character: This section is a wide arterial road. It is composed of standard footpath materials which are mostly poured concrete. An existing cycle lane runs parallel to the footpath. In some areas guardrails and street clutter diminish the quality of the character. There is a continuous median along most of the section, with some trees often of low quality. The rest of the route is a wide arterial road with residential and mixed-uses on its edges. Trees and green spaces are located along the route and median. Loughlinstown Roundabout is a threshold point that leads the route into the Shankill and Bray area.
Loughlinstown Roundabout to Bray North (Wilford Roundabout);		
3		Between Loughlinstown Roundabout to St Anne's Shankill, Including Stonebridge Road there is an outer suburban character. The route typically bounds residential properties with a mix of boundary types including timber fences, hedges, railings and walls, as well as mature trees behind. The built form is generally two-storey houses, some with high boundaries. In places the existing road widths are narrow. Two schools are located on Stonebridge Road. St Anne's Church is a significant local landmark in the area. This section also links with the Shankill Dublin Area Rapid Transit (DART) station area. The section between St Anne's Shankill and Cherrington Road, Including Shankill Village comprises a narrow road leading into the Shankill Village Centre with retail on the western side and residential properties on the eastern side. The retail area comprises two-storey, fine grain retail frontages in a Village setting. Small trees are present within planters along

	retail side and mature trees line the residential edge. 'Heritage' style lighting in black is laid through the village centre. After the main part of Shankill Village, it continuous as a suburban character with narrow carriageway widths in some sections. The main residential areas are set apart from the roadway by areas of green space. Significant lengths of this section of road are tree lined. A small retail area is located at the Barbeque Centre. There is fencing and hedges present along parts of the route. Shanganagh Park and Cemetery are local landmarks. There are numerous property entrances and listed structures along the route at this point
Bray North (Wilford Roundabout) to Bray South (Fran O'Toole Bridge).	
4	The Wilford Roundabout is a wide roundabout with existing grassed area, planting and stone boundary walls. South of the roundabout is of outer suburban character with one and two-storey residential edges, with large front gardens in front of houses with some high fences and edges. Out of town commercial premises feature in this section. Residential properties set back from the road edge. After Old Connaught Avenue there are retail areas in several parts of this section, including the Industrial Yarns Complex. One to three-storey residential properties are present approaching the Village Centre. There is a significant change in topography towards the Village Centre. Castle Street has a local Village Centre character with retail and mixed uses. The street is relatively wide with narrow footpaths and car parking along Castle Street. A recently upgraded small area of urban realm exists close to Fran O'Toole Bridge.
Note: The site also incorporates a number of roads, streets and lanes adjoining these primary roads.	

Overall, the site is located within an urbanised environment primarily along an existing and busy transport corridor which already accommodates foot, cycle, bus and general traffic. There is a mix of uses along site including, residential, retail and commercial, community and social, village centres as well as amenity space. There are a number of landscape and built heritage features along and in the vicinity of the site which are identified in the relevant sections of the EIAR.

4.0 Proposed Scheme

The proposed scheme is an upgrade to the existing bus priority, cycle facilities and pedestrian infrastructure associated with large sections of the Stillorgan/Bray Quality Bus Corridor (QBC), which has been in place for several decades. It will in particular see additional bus priority, cycle facilities and pedestrian infrastructure in the Shankill and Bray areas, where they currently do not exist.

4.1 Development Description (High Level)

The proposed scheme consists of inter alia:

- 36.9 km (two-way) of bus priority infrastructure and traffic management;
- 33.8 km (total both directions) of cycling infrastructure and facilities;
- Provision of new/refurbished pedestrian facilities and footpaths along the scheme and associated ancillary works;
- Widening of the existing pedestrian underpass at St. Laurence Stillorgan, N11 Stillorgan Road;
- Provision of 54 signalised junction upgrades and associated ancillary works;
- Provision of 80 new/refurbished raised table side entry facilities;
- Reconfiguration of existing bus stops resulting in 98 number new bus stop facilities;
- Public Realm works including landscaping, planting, street furniture, street lighting, boundary walls and sustainable urban drainage (SUDs) measures;
- Roads associated earthworks including excavation of unacceptable material, importation of material and temporary storage of materials;
- Provision of road pavement, signing, lining and ancillary works;
- Provision of gates, fencing and boundary treatment works;
- Provision of new and diverted drainage infrastructure;
- Diversion of utilities and services including associated ancillary works; and
- Construction of accommodation works including boundary treatments and ancillary grading and landscaping works; together with all ancillary and consequential works associated therewith.

These details of the proposed scheme are set out in the relevant Public Notices, which accompanied the planning application.

The Board should note that the consequential works associated therewith include the demolition and rebuilding of a protected structure (RPS) Woodbrook Side Lodge (DLR 1874).

This application is accompanied by an EIAR and a Natura Impact Statement (NIS).

Once commenced, it is expected that the construction phase will take approximately 36 months. It is expected the works would occur prior to 2028. The proposed scheme will be constructed in sections that will, individually, have shorter durations typically ranging between 2 to 12 months.

For conciseness, below is a summary of the proposed changes transcribed from Table 6.1 of the EIAR.

Table 5: Summary of Changes as a result of the Proposed Scheme		
Total Length of Proposed Scheme	18.5km	
Bus Priority	Existing (km)	Proposed (km)
Bus Lanes		
Inbound	12.6	16.1
Outbound	12.8	17.1
Bus Priority through Traffic Management		
Inbound	0.0	2.3
Outbound	0.0	1.4
Total Bus Priority (both directions)	25.4	36.9 (+45%)
Bus Measures		
Proportion of Route with Bus Priority Measures	69%	99.60%
Cycle Facilities – Segregated		
Inbound	8.0	16.5
Outbound	9.4	16.9
Cyclist Facilities – Non-segregated		
Inbound	7.5	0.4
Outbound	7.4	0.0
Cyclist Facilities - Overall		
Total Cyclist Facilities (both directions)	32.3	33.8 (+5%)
Proportion Segregated (including Quiet Street Treatment)	47%	91%
Other Features		
Number of Pedestrian Signal Crossings	119	176
Number of Residential Properties with Land Acquisition	Not applicable	56

4.2 Development Description (Detailed)

The proposed scheme is described further below. It is noted that the applicant in Chapter 2 of the EIAR sets out more detail on the development including:

- justification for where deviations occur from standard cross sections,

- detail on bus lane and stop provision,
- cycling provision,
- junction design,
- parking and loading bay design,
- landscape and urban realm proposals,
- land acquisition and use,
- rights of way

The General Arrangement Drawings should be read in conjunction with this general description which is taken directly from the EIAR.

Table 6: Description of the route within the site		
Sec.	Name	Description
Leeson Street to Donnybrook (Anglesea Road Junction);		
1		The section runs along Leeson Street Lower and Upper from the junction with St Stephen's Green, providing continuous bus priority and segregated cycle tracks in each direction. A bus gate has been located at the end of Leeson Street Lower before the St Stephen's Green junction. General inbound traffic is now to be directed from Leeson Street Lower on to Hatch Street Lower, and then on to Earlsfort Terrace in order to reach St Stephen's Green. There will be two-way general traffic introduced on Earlsfort Terrace between the Hatch Street Lower Junction and St Stephen's Green to facilitate this. This will require the northbound bus lane on Earlsfort Terrace to be made a general traffic lane. The existing left turning ban at Earlsfort Terrace towards Stephen's Green North has been removed to facilitate the general traffic movement. The one-way system on Sussex Road and the adjacent section of Leeson Street Upper have been retained, with a reduced number of general traffic lanes in each direction to allow for full bus and cycle lane provision and retain existing parking. The proposed junction at Fitzwilliam Place and Leeson Street Lower from the Fitzwilliam Cycle Route (DCC 2023) has been incorporated into the Proposed scheme, while revised junction layouts at Appian Way, Waterloo Road, and Wellington Place have been designed to improve road user throughput and safety. The full cycle track and bus lane provision continues along Morehampton Road, where in places the cycle tracks are brought behind the tree line. This will impact a number of on-street parking bays between Wellington Place and Belmont Avenue. A 'No Right Turn' restriction has been added from Morehampton Road onto Auburn Avenue to reduce crossing point conflicts. From Mulberry Lane to Rampart Lane the northbound bus lane has been removed to allow for two reduced width segregated cycle tracks in both directions, while the southbound bus lane has been retained along this narrow section. SCP at the Eglinton Terrace junction on Donnybrook Road will provide northbound bus priority over this length. The perpendicular parking spaces south of Mulberry Lane have been converted to parallel spaces, while the echelon parking spaces on the other side of the road have been retained. From Eglinton Terrace southwards to Eglinton Road a dedicated bus lane, segregated cycle track, and general traffic lane are provided in each direction. The tie in for the proposed Dodder Greenway, designed and built by others, has been included in the design at the Eglinton Road junction on Donnybrook Road. On Donnybrook Road between Eglinton Road and Anglesea Road in the southbound direction, there is a straight ahead and left-turn lane, a straight ahead general traffic lane, a bus lane, and a cycle track provided. The northbound approach on the Stillorgan Road towards Beaver Row has a cycle track, bus lane, a combined left and ahead general traffic lane, and a right-turn lane to Ailesbury Road. Between Beaver Row and Eglinton Road there is a cycle track, bus lane, and a combined left and ahead traffic lane.

	Coach laybys have been proposed at certain locations to reduce instances of loading coaches blocking the bus lane. It is proposed that, where possible along Section 1 of the Proposed scheme, existing kerb lines will be retained and the BusConnects Design Guide will be adhered to. Signal Controlled Priority shall be employed at certain locations where full segregated bus lane provision has not been possible due to space constraints.
Donnybrook (Anglesea Road Junction) to Loughlinstown Roundabout;	
2	The existing lane configuration is maintained on the Stillorgan Road between the Beaver Row / Anglesea Road junction and Foster's Avenue, apart from the southbound on-slip at Belfield, where a continuous bus lane is now provided from the slip road to the Stillorgan Road. To achieve this, the existing southbound bus lane on the Stillorgan Road has been truncated and will require coaches, buses, and taxis using it to merge with the adjacent general traffic lane as they pass under the Belfield flyover. New continuous bus lanes will be provided on the southbound off-slip, and across the Belfield flyover. It is intended to provide segregated cycle tracks on each slip road and a two-way segregated cycle track on the Belfield flyover. A separate cycle link will be provided to the adjacent sideroad to the east of the southbound slip roads. On the Stillorgan Road between Seafield Road and Foster's Avenue it is intended to provide a bus lane, a one-way segregated cycle track, and two general traffic lanes in each direction. A short length of two-way segregated cycleway will be provided on each side in this area due to the proximity to UCD. This will run from Woodbine Road to Merrion Grove by the southbound carriageway, and from Foster's Avenue to the newly proposed cycle entrance into UCD opposite Seafield Road by the northbound carriageway. A short new two-way cycle track connection is provided southbound from Merrion Grove which will improve access from Coláiste Eoin / Coláiste Íosagáin to the N11 junction with Merrion Grove. In addition, new junction layouts have been provided at RTÉ and Nutley Lane to improve road user throughput and safety. Bus stop locations and layouts have been reviewed, and in certain areas adjusted, to ensure optimum integration with interfacing services. Coach laybys have been proposed at certain locations to reduce instances of loading coaches blocking the bus lane. The bus interchange proposals at UCD have been developed in collaboration with UCD and are coordinated with the UCD Future Campus masterplan. The UCD Bus Interchange General Arrangement drawings (BCIDB-JACENV_LA-0013_IN_00-DR-LL-9001) in Volume 3 of the EIAR can be referenced in conjunction with the main drawing series for the Proposed scheme, to provide a more detailed overview of the UCD Interchange proposals. The proposed UCD interchange is located adjacent to the Belfield interchange on the R138 Stillorgan Road (at Chainage A4000 of the Proposed scheme) and consists of two main operation zones. The main interchange plaza adjacent to the N11 northbound slip road will accommodate high frequency bus routes. The interchange bus islands located south of the UCD veterinary building, to the north-west of the main plaza and existing woodland, will be used for lower frequency and regional bus routes, as well as to provide overflow for the main plaza services. The interchange proposals also capture upgrade works for a shared pedestrian and cyclist commuter route along a naturally developed route through the existing woodland area. The overall site will provide 20 bus stop locations with 12 standard NTA / UCD bus shelters finished to match UCD street furniture. Two landmark bus shelters are proposed with passenger seating area. Each shelter will serve two stops on each side of the main plaza, positioned central to the stops they serve. The shelter's cantilevered canopies provide large, covered areas of waiting, supplementing the semi-enclosed waiting rooms. 87m of seating is provided, enough for 40% of the estimated 350 peak bus patrons. They have been designed to provide a cohesive solution adjacent to UCD's proposed Future Campus masterplan development, including the proposed Arrival Plaza. The existing Lane configuration between Foster's Avenue and Wyattville Road has for the most part been retained. Junction designs along the route have been reviewed in an attempt to remove left turn filter lanes crossing cycle lanes where possible. Between Merrion Grove and Lower Kilmacud Road it is proposed to provide a bus lane and two general traffic lanes plus a one-way segregated cycle track in each direction. A new dedicated footpath is to be provided between the Lower Kilmacud Road and the Old Dublin

	Road (Stillorgan), and the Old Dublin Road (Stillorgan) and Trees Road Lower junctions on both sides of the Stillorgan Road. The new southbound footpath at this location will require an extension to the existing St Laurence's Park subway, where a new toucan crossing will also be provided across the Stillorgan Road. The slip road from the Stillorgan Road on to The Hill at Stillorgan is proposed to be closed. The northbound cycle track north of Brewery Road has been diverted on to St Brigid's Church Road, additional traffic calming and footway improvement measures are proposed along the St Brigid's Church Road to accommodate this. A section of southbound cycle track has also been diverted on to Belmont Terrace at Galloping Green. A new pedestrian link is proposed to South Park from Bray Road in Cornelscourt, and to Shanganagh Vale from the Bray Road. It is proposed to maintain one bus lane and two general traffic lanes in each direction between Wyattville Road and Loughlinstown Roundabout. Widening of the carriageway and a setback of existing vehicle restraint systems in front of the pedestrian footbridge will be provided on the southbound carriageway to ensure a continuous southbound bus lane through the Loughlinstown Roundabout. Footpaths are not proposed as per existing infrastructure between the Old Bray Road and Cornelscourt Shopping Centre pedestrian bridge, and between Clonkeen Road and Johnstown Road junctions and between Johnstown Road junction and the new junction at Druid's Glen Road, as alternative walking routes exist on adjacent quieter roads. A new footpath is proposed on either side of the Stillorgan Road at the new junction on the N11 at Druid's Glen Road which tie-in with the existing footpath towards Wyattville Road. Improvements have been made to cycle track provisions at the Wyattville Road Junction. The existing adjacent northbound Bray Road slip towards Cherrywood Road will be retained in its current two-way layout. At the Loughlinstown Roundabout it is proposed to signalise the existing roundabout on three arms and to provide a continuous bus lane southbound through the junction towards Shankill. In addition, new junction layouts have been proposed at all major junctions along this section to remove existing left turn slips and to provide improved cycle movements. The northbound U-turn Lane has been removed at the Westminster Road junction in order to facilitate a toucan crossing. It is proposed that existing kerb lines will be retained and that the BusConnects Design Guide will be adhered to where possible along Section 2 of the Proposed scheme.
Loughlinstown Roundabout to Bray North (Wilford Roundabout);	
3	Between Loughlinstown Roundabout and Stonebridge Road it is intended to provide a bus lane and general traffic lane in both directions. Where bus lanes are not continuous, Signal Controlled Bus Priority has been provided. South of Stonebridge Road up to Crinken Lane, where bus lanes are not continuous in both directions due to existing constraints, SCP has been proposed to ensure bus priority. Signal Controlled Bus Priority has been proposed between the St Anne's Church / Corbawn Lane Junction and Rathmichael Woods in the northbound direction. Segregated cycle tracks have not been provided between Loughlinstown Roundabout and Stonebridge Road along the Proposed scheme. It is intended to provide a two-way cycle track from Stonebridge Road on the Dublin Road as far as the Shanganagh Road junction, and on Stonebridge Road as far as Stonebridge Lane to provide a cycle link to the two schools on Stonebridge Road. The roundabout between the Dublin Road, Corbawn Lane, and Shanganagh Road is proposed to be upgraded to a signalised junction with new pedestrian crossing facilities and SCP for buses. Corbawn Lane is to be an exit only junction on to Shanganagh Road. A dedicated right-turn lane is proposed from Shanganagh Road on to Beechfield Manor. A dedicated left turn lane from Shanganagh Road into Beechfield Manor is also to be provided. The proposed design between the Shanganagh Road junction and Crinken Lane retains the existing general traffic lanes with no bus or cycle lanes, apart from a section of the northbound carriageway where a bus lane is provided from Crinken Lane to a new junction

	at the entrance to Olcovar. Signal-controlled bus priority will be provided along this section. The Quinn's Road roundabout is to be upgraded to a signalised junction, and an upgraded signalised junction is proposed at the entrance to the Olcovar development. Footpaths along the Dublin Road at Cherrington Drive and Beech Road are to be retained at their roadside location. From Crinken Lane to the Wilford Roundabout it is proposed to provide northbound and southbound bus lanes, segregated cycle tracks and general traffic lanes. Signal-controlled bus priority will be used northbound from Wilford Junction for a short distance as far as Woodbrook College. Where appropriate, roadside trees shall be retained by locating the proposed footpaths and cycle tracks behind the tree line. Improved lighting and crowning of trees will be provided to enhance visibility. New pedestrian crossings are proposed at the new junction outside Olcovar, south of Crinken Lane, south of Allies River Road, and by Crinken Church. The existing pedestrian crossing at Woodbrook College is to be moved southwards to provide a crossing point close to the relocated southbound bus stop. At Shanganagh Park and Shanganagh Cemetery, the northbound and southbound cycle track are proposed to be diverted into the park, alongside the southbound footpath, and behind green space and existing trees to the eastern side of the carriageway between two Toucan Crossings, with a newly proposed cemetery boundary wall set back to enable the retention of the roadside tree line. New lighting and crowned trees will be provided to ensure through visibility. Playground areas will be retained in their current existing location as part of BusConnects proposals. Their final future location will be confirmed as part of the Shanganagh Park and Cemetery Masterplan. Two new residential developments are under construction, at Shanganagh Castle and the Woodbrook Estate. The proposed signalised junctions for these developments and bus stops have been coordinated with the development proposals and incorporated within the design. It is proposed that existing kerb lines will be retained and that the BusConnects Design Guide will be adhered to where possible along Section 3 of the Proposed scheme. Bus stop locations and layouts have been reviewed, and in certain areas adjusted, to ensure optimum spacings. Coach laybys have been proposed at certain locations along the route to reduce instances of loading coaches blocking the bus lane.
Bray North (Wilford Roundabout) to Bray South (Fran O'Toole Bridge).	
4	From the M11 junction (Wilford Roundabout) to the Lower Dargle Road, it is proposed to continue with a bus lane, general traffic lane and a segregated cycle track in each direction. All junctions have been developed further to provide improved cycle movements. It is proposed to replace the Wilford Roundabout with a new signalised junction. The Corke Abbey Avenue / Old Connaught Avenue junction with the Dublin Road has been designed to cater for the proposed bus and cycle lanes, and to remove the left turn slips in and out of Corke Abbey Avenue. The design for the Upper Dargle Road junction with the Dublin Road has removed the northbound left turn slip from the Dublin Road. The junction with the new road at Chapel Lane has also been upgraded to a signalised junction, including improved cycle and pedestrian movements. The proposed works will impact the existing Woodbrook Side Lodge, which is a heritage structure located at the southern end of the Woodbrook Estate in Bray. It is proposed to demolish the existing lodge and build a new lodge building further east of its present location in order to allow for road widening in that area. In order to reduce the heritage impact associated with the demolition, it is proposed to reuse some of the materials from the existing lodge within the new lodge, where it is fit for reuse. Refer to the Woodbrook Side Lodge Plans and Elevations drawings (BCIDB-JAC-BLD_ZZ-0013_XX_01-DR-AA-0001, BCIDB-JAC-BLD_ZZ-0013_XX_02-DR-AA-0001) in Volume 3 of the EIAR for detail on the proposed schemes to rebuild the Woodbrook Side Lodge residential property. The EIAR has assessed the impacts associated with the demolition and subsequent construction of a replacement lodge building. However, in order to ensure a worst-case scenario has been assessed, where relevant an assessment has also been done of a scenario in which the building is not replaced.

	The proposed works will impact the existing Circle K Petrol Station on the eastern side of the Dublin Road. In order to make space for the wider cross-section at this location, the outer four pumps will be removed, and the canopy size will be reduced. The remainder of the petrol station will be reinstated. Refer to Chapter 5 (Construction) and the Circle K General Arrangement drawing (BCIDB_JAC_SPW_AW-0013_XX_00_DR_0001) in Volume 3 of the EIAR for detail on the proposed schemes at this location. At the end of the Proposed scheme at the tie-in to the Fran O'Toole Bridge, the northbound bus lane starts just after the Lower Dargle Road junction so the tie-in at the Proposed scheme termination consists of a southbound bus lane and two general traffic lanes and cycle track in both directions, on the immediate Castle Street approach to the Fran O'Toole Bridge, where the Proposed scheme will end. This layout has been developed to coordinate with the proposed Bray Bridge Improvement Scheme. It is proposed to retain the existing kerb lines wherever possible and adhere to the design standards from the PDGB along Section 4 of the Proposed scheme. Bus stop locations have been reviewed, and in certain areas adjusted, to ensure optimum spacings. Coach laybys have been proposed at certain locations along the route to reduce instances of loading coaches blocking the bus lane

4.3 Development Need

The applicant has put forward a statement of need in Section 3.0 of the EIAR which largely arises from the congestion caused by private car dependence which is affecting quality of life, the urban environment, and road safety. Due to upward population trends in the Greater Dublin Area (GDA) congestion will increase unless an intervention is made. Increasing congestion will result in longer and less reliable pedestrian, cycle, and bus journeys throughout the region and this will affect the quality of people's lives.

Overall, the proposed scheme will make a significant contribution to the aims and objectives of the GDA Transport Strategy 2022 – 2042 as well as supporting the key actions and targets for transport set out in the Climate Action Plan 2024 (CAP24). The CAP24 seeks a 50% reduction in transport emissions by 2030. There is also a target for a 20% reduction in total vehicle kilometres, a reduction in fuel usage, and significant increases to sustainable transport trips and modal share.

4.4 Development Objectives

The objectives of the proposed scheme 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.

4.5 Documents supporting the Proposed scheme

The following documents were submitted to the Board in the first instance in support of the proposed scheme:

- Planning Application Documentation
    - Planning Cover Letters
    - Site Notice
    - Newspaper Notice
    - EIAR Portal Confirmation (2023033)
    - Schedule of Prescribed Bodies and copy of Notification Letters
    - Confirmation Planning Application Fee
    - Location Maps
- EIAR
    - Volume 1- EIAR Non-Technical Summary (NTS)
    - Volume 2- EIAR Main Body
    - Volume 3- Figures
    - Volume 3- EIAR Appendices
- Appropriate Assessment (AA) Screening Report
- NIS (including Appendices)
- Preferred Options Report (including Appendices)
- Preliminary Design Report (including Appendices)
- Public Consultation Report

On the 24th of May 2024, the applicant submitted information in respect of ABP-317742-23 (SID), as requested by the Board, in response to submissions on the file from observers. This included:

- NTA Observations on the Proposed Scheme Submissions
    - Overview of Submissions
    - Response to Common Issues
    - Response to Individual Submissions

5.0 Planning History

A review of the relevant local authority planning portal and the Board's case files was carried out the on the 26th of August 2024 to collate any relevant, recent (within 10 years) planning history for the site. A detailed planning history is provided in Volume 4 of the EIAR Appendices in A2.1 Planning Report. This is noted.

There are a significant number of planning applications along the route which include large residential, domestic residential such as alterations to existing houses, commercial and community development and telecommunication infrastructure etc. This is to be expected in such urban locations. These are all noted and considered in the context of the assessment below – in particular the cumulative and in-combination assessments.

A number of observers to the file made reference in in their submissions to planning histories for particular sites, which are noted and acknowledged. In addition, DCC, in their submission, cited several other planning histories that are omitted from the applicants list in Volume 4 of the EIAR Appendices in A2.1 Planning Report. This is also noted.

6.0 Policy Context

The Board should note the following European, national and regional level policies and guidance which will be relied on in in the assessment below. They are generally all supportive, both directly and indirectly, of mobility scheme such as at proposed.

6.1 European

6.1.1 Towards a Fair and Sustainable Europe 2050: Social and Economic Choices in Sustainability Transitions (European Union (EU) Commission 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.

6.1.2 Sustainable and Smart Mobility Strategy 2020 (EU Commission, 2020)

The Smart and Mobility Strategy aims to reduce transport emissions by 90% by 2050. Objectives include:

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

6.1.3 European Green Deal (EDG) (European Commission (EC), 2019)

The EC 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.

6.2 National

6.2.1 Climate Action Plan 2024 (DECC, 2024)

The CAP24, builds on CAP23 and sets out a roadmap to halve emissions by 2030 and reach net zero by 2050. CAP24 continues to seeks the implementation of 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 2022 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 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 CAP24 to equip people with the skills to benefit from change and to acknowledge that costs need to be shared. Large investment will be necessary through public and private sectors to meet CAP24 targets and objectives.

The electricity sector will help to decarbonise the transport, heating and industry sectors and will face a huge challenge to meet requirements under its own sectoral emissions ceiling. CAP24 reframes the previous pathway outlined in CAP23 and 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 was commenced in 2023 with the aim of reducing travel demand and improving sustainable mobility alternatives.

The major public transport infrastructure programme set out in the National Development Plan (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 CAP24 for the period 2024-2026.

6.2.2 Cycle Design Manual (NTA, 2023)

The Cycle Design Manual 2023 replaced the previous 2011 National Cycle Manual and draws on the experience of cycle infrastructure development over the past decade and international best practice to help deliver safe cycle facilities for people of all ages and abilities. The Manual is intended as a live document that will be updated to reflect emerging best practice.

Chapter 2 of the Manual sets out the five main requirements of safety, coherence, directness, comfort, and attractiveness) that designs should fulfil to cater for existing cyclists and to attract new cyclists to the network.

Chapter 3 of the Manual addresses wider cycle network planning. Designing for cycling is covered in Chapter 4,

The Manual makes a single reference to BusConnects under protected junctions, where it is noted that a small number of such junctions have been implemented in Ireland and many more are currently being planned under active travel schemes around the country and on BusConnects corridors in Dublin and regional cities. The Manual anticipates that the continued rollout of protected junctions will improve junction consistency and coherence on the cycle network.

6.2.3 National Sustainable Mobility Policy (DoT, 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.

6.2.4 National Sustainable Mobility Policy Action Plan 2022-2025 (DoT, 2022)

This action plan sets out specific goals and associated core actions to deliver the National Sustainable Mobility Policy. BusConnects is identified as a key project to be delivered within 2025.

6.2.5 National Development Plan 2021-2030 (DPE, 2021)

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 CBCs expected to be substantially complete in all five cities by 2030.

6.2.6 National Investment Framework for Transport in Ireland (DoT, 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.

BusConnects 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.

6.2.7 Design Manual for Urban Roads and Streets (DHLGH, 2019)

This Manual provides guidance on how provide a balance design for urban streets. 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.
- 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.

6.2.8 National Planning Framework Project Ireland 2040 (DHPLG, 2018)

The National Planning Framework (NPF) 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) of the NPF recognises that 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 NDP makes provision for investment in public transport and sustainable mobility solutions to progressively put in place a more sustainable alternative. Furthermore NSO 4 provides support to develop a comprehensive network of safe cycling routes in metropolitan areas to address travel needs.

6.2.9 Permeability in Existing Urban Areas Best Practice Guide 2015 (NTA, 2015)

Among the priorities of the 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.

6.2.10 Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009 – 2020 (DoT, 2009)

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

1. to reduce overall travel demand,
2. to maximise the efficiency of the transport network,
3. to reduce reliance on fossil fuels,

4. to reduce transport emissions and
5. 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.

6.3 Regional

6.3.1 Regional Spatial Economic Strategy for the Eastern and Midlands Region (RSES)

The Regional Spatial Economic Strategy for the Eastern and Midlands Region (RSES) sets out the strategic plan and investment framework for the region which includes counties, Dublin and all their constituent local authorities and Wicklow

Chapter 5 of the RSES refers to the 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 sets out the guiding principles for the growth of the Dublin Metropolitan Area and includes “Integrated Transport and Land use” which covers a range of issues from focusing growth along existing and proposed high quality public transport corridors to supporting the delivery of BusConnects and other public transport programmes. The following Regional Policy Objective (RPO) are noted.

Table 7: Policies and Objective of the Regional Spatial Economic Strategy	
Policy/Objective	Detail
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
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.

Section 5.6 of the RSES 'Integrated Land use and Transportation' references the key transport infrastructure investments in the metropolitan area as set out in national policy which includes "investment in bus based public transport" will be delivered through BusConnects, which aims to overhaul the current bus system in the Dublin Metropolitan Area. Chapter 8 'Connectivity' of the RSES also references that bus infrastructure and services will be delivered through BusConnects (Section 8.4 refers).

6.3.2 Transport Strategy for the Greater Dublin Area 2022-2042

The 2022-2042 Transport Strategy sets out a framework for investment in transport infrastructure and services up to 2042. The Transport Strategy recognises a wide range of challenges for transport underpinned by climate change; the COVID 19 pandemic; servicing the legacy development patterns; revitalising city and town centres; transforming the urban environment; ensuring universal access; serving rural development; improving health and equality; fostering economic development; and delivering transport schemes.

The overall aim of the Transport Strategy is "to provide a sustainable, accessible and effective transport system for the GDA which meets the region's climate change requirements, serves the needs of urban and rural communities, and supports the regional economy."

Chapters 10, 11 and 12 of the Transport Strategy address walking, accessibility, and the public realm; cycling and personal mobility vehicles; and public transport respectively, and these sections relate both directly and indirectly to the proposed BusConnects programme.

Chapter 12 sets out the strategy for an overall public transport system for the region, central to which is the delivery of a comprehensive bus network, based on enhanced level of service and much greater on-street priority. Section 12.2.2 of the Transport Strategy notes that BusConnects Dublin comprises a range of elements including approximately 230km of radial bus priority and 200km of cycle routes, a new bus service network, new bus stops and shelters, low/zero emissions bus fleet, new park and ride interchanges, and a revised fare structure. The Proposed scheme is one of 12 radial schemes being brought forward under this programme to facilitate faster

and more reliable bus journeys on the busiest bus corridors in the Dublin region. Key elements of the Cycle Network Plan will also be delivered along these corridors. The following measures in the Transport Strategy relate to the roll out of BusConnects:

Table 8: Transport Strategy for the Greater Dublin Area 2022-2042	
Measure	Detail
BUS1	Core Bus Corridor Programme: Subject to receipt of statutory consents, it is the intention of the NTA to implement the 12 Core Bus Corridors as set out in the BusConnects Dublin programme.
BUS2	Additional Radial Core Bus Corridors: It is the intention of the NTA to evaluate the need for, and deliver, additional priority on radial corridors.
BUS3	Orbital and Local Bus Routes: It is the intention of the NTA to provide significant improvements to orbital and local bus services in the following ways: Increase frequencies on the BusConnects orbital and local bus services; and Providing bus priority measures at locations on the routes where delays to services are identified.

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

With respect to walking, accessibility, and the public realm, it is recognised in the Transport Strategy that better urban design and placemaking will encourage more people to walk, cycle or use public transport. Specific measures are outlined to incorporate a high standard of urban design and placemaking into major public transport infrastructure schemes and walking and cycling projects, taking account of architectural heritage (PLAN14 and PLAN15 of the Transport Strategy refer). Furthermore, measure PLAN16 seeks the reallocation of road space to prioritise walking, cycling and public transport use and the placemaking functions of the urban street network. Other specific measures relating to walking, accessibility and public realm include Measure WALK2 – Improved Footpaths; Measure WALK4 – Improved Junctions; Measure WALK6 – Crossing Points; Measure WALK8 – Traffic-Free Streets and Pedestrianisation; and Measure WALK9 – regarding those with disabilities or mobility impairments.

In terms of cycling and personalised mobility vehicles, it is the intention of the NTA and the local authorities to deliver a safe, comprehensive, attractive, and legible cycle network in accordance with the updated GDA Cycle Network (Measure CYC1 of the Transport Strategy refers). It is noted that some of the cycle provision included in BusConnects schemes examines the appropriateness of emerging international approaches to design standards. As the number of cyclists grows, the requirement to

ensure that cyclists can travel unimpeded along their entire journey becomes critical and this needs to be reflected in how cycle infrastructure and other traffic is managed. This is reflected in the Transport Strategy through Measure CYC2 – Cycle Infrastructure Design; Measure CYC3 – Extended Hours of Operation of Cycle Infrastructure; and Measure CYC4 – Maintenance of Cycle Infrastructure.

Chapter 17 provides the outcomes and how the Strategy contributes to an enhanced natural and built environment (consolidated development, public realm and placemaking, reduced impacts of traffic, improved air quality and noise levels); how the Strategy leads to more connected communities and better quality of life (enhanced community interaction, high quality public transport coverage); how the Strategy contributes to a strong and sustainable economy; and how the Strategy fosters an inclusive transport system (equality, health and access to jobs).

6.3.3 Greater Dublin Area Cycle Network Plan (NTA, 2013 and 2022)

The GDA Cycle Network Plan 2013 consisted of the urban network, inter-urban network, and green route network for local authority areas in the GDA (i.e., DCC, DLRCC, WCC and South Dublin, Fingal, Meath, Kildare County Councils). The key goal of the Cycle Network Plan was to ensure that a cycling culture is developed to an extent that by 2020, 10% of all journeys will be by bike via a high quality and extensive cycle route network.

The updated GDA Cycle Network was published along with the GDA Transport Strategy, 2022-2042. It is stated in the Strategy that “while the 2013 Plan has provided a robust framework for such investment to date, evolutions in cycle policy, design guidance and urban form since its publication have prompted an update of the network”. This review has ensured that the network proposed is fit for purpose and takes account of the needs of the full spectrum of users and trip types. The revised GDA Cycle Network forms part of the Transport Strategy and is published in full alongside this report.”

The network plan includes a primary cycle route from St. Stephen’s Green to Loughlinstown Roundabout. Between Loughlinstown Roundabout and St Anne’s Roundabout it is identified as secondary route. It rejoins a primary route again at this point to Bray. There are also a number of secondary, (other primary) and greenway cycle routes which connect with/traverse the proposed scheme and will use junctions that will be subject to works.

6.4 County

6.4.1 Dublin City Council

6.4.1.1 Dublin City Development Plan 2022-2028

Specific Policy Objectives in respect of BusConnects

The main strategic approach of the Dublin City Development Plan 2022-2028 (DCDP) is to develop a city that is low carbon, sustainable and climate resilient. Chapter 8 of the DCDP relates to sustainable movement and transport, and highlights that the sustainable and efficient movement of people and goods is crucial for the success and vitality of the city, along with the need to move away from private car and fossil-fuel-based mobility to reduce the negative impacts of transport and climate change.

To this end Objective SMTO1 states:

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

Table 8.1 of the DCDP sets out current and target mode share with cycling expected to increase by 7% by 2028 and public transport (bus, rail, and Luas) by 3% in the same timeline. It is stated that the modest increase in public transport mode share anticipates the construction of major public transport infrastructure that is proposed to occur over the lifetime of the plan, and accordingly the impact of public transport infrastructure projects on modal share is more likely to come into fruition during the lifespan of the following City plan.

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. DCC actively supports all measures being implemented or proposed by other transport agencies to enhance capacity on existing lines/services and provide new infrastructure. In this regard Policy SMT22 – Key Sustainable Transport Projects seeks:

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

DART +,
Metrolink from Charlemount to Swords,
BusConnects CBC projects,
Delivery of Luas to Finglas,
Progress and delivery of Luas to Poolbeg and Lucan"

Related Policy Objectives in respect of BusConnects

There are numerous policies in Chapter 8 of the DCDP which support the principle of sustainable mobility. Related policies include:

Table 9: Policies and Objective of the DCDP	
Policy/Objective	Detail
SMT1 Modal Shift and Compact Growth	To continue to promote modal shift from private car use towards increased use of more sustainable forms of transport such as active mobility and public transport, and to work with the National Transport Authority (NTA), Transport Infrastructure Ireland (TII) and other transport agencies in progressing an integrated set of transport objectives to achieve compact growth
SMT3 Integrated Transport Network	To support and promote the sustainability principles set out in National and Regional documents to ensure the creation of an integrated transport network that services the needs of communities and businesses of Dublin City and the region
SMT11 Pedestrian Network	To protect, improve and expand on the pedestrian network, linking key public buildings, shopping streets, public transport points and tourist and recreational attractions whilst ensuring accessibility for all, including people with mobility impairment and/or disabilities, older persons and people with children.
SMT12 Pedestrians and Public Realm	To enhance the attractiveness and liveability of the city through the continued reallocation of space to pedestrians and public realm to provide a safe and comfortable street environment for pedestrians of all ages and abilities.
SMT13 Urban Villages and the 15-Minute City	To support the role of the urban villages in contributing to the 15-minute city through improvement of connectivity in particular for active travel and facilitating the delivery of public transport infrastructure and services, and public realm enhancement.
SMT14 City Centre Road Space	To manage city centre road-space to best address the needs of pedestrians and cyclists, public transport, shared modes, and the private car, in particular, where there are intersections between DART, Luas and Metrolink and with the existing and proposed bus network.
SMT15 'Last-Mile' Delivery	To seek to achieve a significant reduction in the number of motorised delivery vehicles in the city through supporting and promoting the use of the 'last-mile' delivery through the development of micro hubs and distribution centres.
SMT16 Walking, Cycling and Active Travel	To prioritise the development of safe and connected walking and cycling facilities and prioritise a shift to active travel for people of all ages and abilities, in line with the city's mode share targets.
SMT18 The Pedestrian Environment	To continue to maintain and improve the pedestrian environment and strengthen permeability by promoting the development of a network of

	pedestrian routes including laneway connections which link residential areas with recreational, educational and employment destinations to create a pedestrian environment that is safe, accessible to all in accordance with best accessibility practice.
SMT19 Integration of Active Travel with Public Transport	To work with the relevant transport providers, agencies and stakeholders to facilitate the integration of active travel (walking/cycling etc.) with public transport, ensuring ease of access for all.
SMT20 Walking and Cycling for School Trips	(a) To prioritise and target a significant increase in the number of children walking and cycling to and from schools; (b) To promote walking and cycling for school trips to all educational facilities; (c) To promote and support initiatives such as "Safe Routes to School", the 'Green Schools' and 'Schools Streets' projects, and to prioritise school routes for permeability projects and provision and enhancements of pedestrian and cycle ways.
SMT25 On-Street Parking:	To manage on-street car parking to serve the needs of the city alongside the needs of residents, visitors, businesses, kerbside activity and accessible parking requirements, and to facilitate the re-organisation and loss of spaces to serve sustainable development targets such as in relation to, sustainable transport provision, greening initiatives, sustainable urban drainage, access to new developments, or public realm improvements.
SMT33 Design Manual for Urban Roads and Streets:	To design new streets and roads within urban areas in accordance with the principles, approaches and standards contained within the Design Manual for Urban Roads and Streets (DMURS) and to carry out upgrade works to existing road and street networks in accordance with these standards where feasible.
SMT34 Street and Road Design:	To ensure that streets and roads within the city are designed to balance the needs and protect the safety of all road users and promote place making, sustainable movement and road safety providing a street environment that prioritises active travel and public transport whilst ensuring the needs of commercial servicing is accommodated.
SMT35 Traffic Calming and Self-Regulation Street Environments	To ensure that all streets and street networks are designed to passively calm traffic through the creation of a self-regulating street environment that are suited to all users, including pedestrians and cyclists.

Zoning Objectives

The majority of proposed works are within and along the existing public road where there is no specific zoning provided in the DCDP. The Proposed scheme runs adjacent to lands that have been zoned in the following areas:

Table 10: Zoning Objective of the DCDP
Zones
Z1 Sustainable Residential Neighbourhoods
Z2 Residential Neighbourhoods (Conservation Areas)
Z3 Neighbourhood Centres
Z4 Key Urban Villages/Urban Villages
Z6 Employment/Enterprise
Z8 Georgian Conservation Areas
Z9 Amenity/Open Space Lands/Green Network
Z11 Waterways Protection
Z12 Institutional Land (Future Development Potential)
Z15 Community and Social Infrastructure

Specific Policies in respect of Natural Heritage

Chapter 10: Green Infrastructure and Recreation of the DCDP considers a range of policy objectives to protect and conserve natural heritage features. The following policies are noted.

Table 11: Natural Heritage Policies and Objective of the DCDP	
Policy Objective	Heading
GI5	Greening of Public Realm / Streets
GI9	European Union Natura 2000 Sites
GI10	Flora and Fauna Protected under National and European Legislation Located Outside Designated Areas
GI10	Proposed Natural Heritage Areas (NHAs)
GI12	National and International Sites for Nature Conservation
GI13	Areas of Ecological Importance for Protected Species
GI14	Ecological / Wildlife Corridors
GI18	Minimise Impact – Light and Noise
GI29	Protect Character of River Corridors
GI40	Tree Planting - General
GI41	Protect Existing Trees as Part of New Development
GI42	Tree Management

The following site specific objectives are noted:

Table 12: Site Specific Natural Heritage Policies and Objective of the DCDP	
Objective	Site
Blue Green Corridors	River Dodder
	Grand Canal
Designated/European Sites	Dublin Bay SACs/SPAs
	Grand Canal pNHA
Biosphere	Dublin Bay Biosphere
Parks	St Stephen's Green

Specific Policies in respect of Built Heritage

Chapter 11: Built Heritage and Archaeology of the DCDP considers a range of policy objectives to protect and conserve built heritage features. The following policies are noted.

Table 13: Built Heritage Policies and Objective of the DCDP	
Policy Objective	Heading
BHA2	Development of Protected Structures
BHA3	Loss of Protected Structures
BHA7	Architectural Conservation Areas
BHA8	Demolition in an ACA
BHA9	Conservation Areas
BHA10	Demolition in a Conservation Area
BHA18	Historic Ground Surfaces, Street Furniture and Public Realm
BHA19	Historic Street Furniture and the RPS
BHA26	Archaeological Heritage

The following site specific objectives are noted:

Table 14: Site Specific Built Heritage Policies and Objective of the DCDP	
Objective	Site

Conservation Areas	St Stephen's Green East to Leeson Street Upper
	River Dodder
Architectural Conservation Area	Mount Eden Road and Belmont Avenue
Record of Monuments and Places	St Stephen's Green East to Leeson Street Lower
	Donnybrook Area
Protected Structures	St Stephen's Green
	Leeson Street Lower
	Eustace Bridge
	Leeson Street Upper
	Morehampton Road
	Donnybrook Church
	RTÉ Campus

6.4.1.2 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 which are listed below:

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

6.4.1.3 Draft Dublin City Centre Transport Plan 2023

In September 2023 DCC in partnership with the NTA published the Draft Dublin City Centre Transport Plan 2023. Key initiatives outlined in the draft plan include:

- Removing 2 out of every 3 cars in the city centre which do not have a destination there.
- Implementing traffic management measures that prioritise pedestrians, public transport, and cyclists.

The Draft Plan acknowledges that the roll out of BusConnects and other public transportation projects over its lifetime will provide a major increase in public transport capacity as well as enabling buses to reach the city centre without undue delay. A critical element of the Draft Plan is to ensure that BusConnects can operate an efficient, reliable, and punctual service within the City Centre.

6.4.2 Dún Laoghaire-Rathdown County Council

6.4.2.1 Dún Laoghaire-Rathdown County Development Plan 2022-2028

Specific Objectives in respect of BusConnects

The Dún Laoghaire-Rathdown County Development Plan 2022-2028 (DLRCDP) is underpinned by the following five interrelated Strategic County Outcomes.

- Creation of a climate resilient County,
- Creation of a compact and connected County,
- Creation of a Network of liveable Towns and Villages,
- Creation of an inclusive and healthy County, and
- Creation of a vibrant economic County.

Chapter 5 of the DLRCDP refers to Traffic and Mobility, and the introduction to this chapter states that

"A holistic approach to transport is required with the aim to reduce dependency on the private car in favour of walking, cycling and public transport," with the aim of reducing congestion, create a more liveable city and reduce greenhouse gas emissions.

The overall policy approach outlined in the DLRCDP is:

- To adopt the "Avoid-Shift-Improve Approach" to transport, (built around the principles of reducing/avoiding the need to travel, shift to environmentally friendly modes of travel and improving the efficiency of transport modes and vehicle technology).
- To integrate land use and transport policies.
- To support the demand management approach which focuses on moving people from the private car to more sustainable modes.
- To improve permeability for the pedestrian and cyclist.
- To improve attractive high quality inclusive and connected walking and cycling networks with direct routes to local destinations at public transport hubs.

- To adopt a balanced approach to road and street design in accordance with the four core principles of the design manual for urban roads and streets (2019) (DMURS) - connected networks multifunctional streets pedestrian focus and a multidisciplinary approach resulting in a more place based/integrated street design.

In this regard Policy Objective T6: Quality Bus Network/BusConnects states:

It is a Policy Objective to co-operate with the NTA and other relevant agencies to facilitate the implementation of the bus network measures as set out in the NTA's 'Greater Dublin Area Transport 2016-2035' and 'Integrated Implementation Plan 2019-2024' and the BusConnects Programme, and to extend the bus network to other areas where appropriate subject to design, environmental assessment, public consultation, approval, finance and resources. (Consistent with RPO 8.9 of the RSES)

Related Policy Objectives in respect of BusConnects

There are numerous policies in Chapter 8 of the DLRCDP which support the principle of sustainable mobility. Related policies include:

Table 15: Policies and Objective of the DLRCDP	
Policy/Objective	Detail
T1 Integration of Land Use and Transport Policies	It is a policy objective to actively support sustainable modes of transport and ensure that land use and zoning are aligned with the provision and development of high-quality public transport systems.
T3 Delivery of enabling transport infrastructure	It is a policy objective to support the delivery of enabling transport infrastructure to allow development take place in accordance with the core strategy of this plan and the settlement strategy of the RSES. (In relation to policy objective T3 the DLRCDP lists BusConnects as enabling transport infrastructure).
T4 Development of Sustainable Travel and Transport	It is a policy objective to promote, facilitate and cooperate with other transport agencies in securing the implementation of the transport strategy for the County and the wider metropolitan area as set out in the Department of Transport's "Smarter Travel, A Sustainable Transport Future 2009 – 2020" and subsequent updates, the NTA's "Transport Strategy for the Greater Dublin Area 2016-2035" and subsequent updates, the RSES and the MASP.
T5 Public Transport Improvements	It is a policy objective to expand attractive public transport alternatives to carry transport as set out in "Smarter Travel, A Sustainable Transport Future" and subsequent updates the NTA's "Transport Strategy for the Greater Dublin area 2016 – 2035" and the NTA's "Integrated Implementation Plan 2019 to 2024" and subsequent updates by optimizing existing or proposed transport corridors, interchanges, developing new park and rides, taxi ranks, and cycling network facilities at appropriate locations.
T6 Quality Bus Network/BusConnects	It is a policy objective to cooperate with the NTA and other relevant agencies to facilitate the implementation of the bus network measures as set out in the NTA's "Greater Dublin Area Transport 2016 to 2035" and "Integrated Implementation Plan 2019 – 2024" and the BusConnects programme, and to extend the bus network to other areas where appropriate subject to design, environmental assessment, public transit consultation, approval, finance, and resources.
T7 Public Transport Interchanges	It is a Policy Objective to facilitate the provision of quality public transport interchanges at strategic rail, Luas stations and Core Bus

	Corridors within the County in accordance with national and regional guidelines in order to facilitate focussed access to multiple public transport modes and to maximize the movement of people via sustainable modes.
T11 Walking and Cycling	It is a policy objective to secure the development of a high quality, fully connected and inclusive walking and cycling network across the county and the integration of walking, cycling and physical activity with placemaking including public realm permeability improvements.
T12: Footways and Pedestrian Routes	It is a Policy Objective to maintain and expand the footway and pedestrian route network to provide for accessible, safe pedestrian routes within the County in accordance with best accessibility practice.
T13: County Cycle Network	It is a Policy Objective to secure improvements to the County Cycle Network in accordance with the DLR Cycle Network Review whilst supporting the NTA on the development and implementation of the Greater Dublin Area Cycle Network Plan 2013 and subsequent revisions, subject to environmental assessment and route feasibility.
T20: Control of On-Street Parking	It is a Policy Objective to regulate and control on-street parking by discouraging commuter parking.
T22: Taxi/Minibus/Hackney Transport	It is a Policy Objective to facilitate the provision of taxi/minibus/hackney transport as a feeder service to major public transport corridors and to encourage the provision of taxi ranks at DART Stations, Luas stops, key bus stations and at other appropriate locations - including within larger residential, commercial and/or mixed-use developments
T23: Roads and Streets	It is a Policy Objective, in conjunction and co-operation with other transport bodies and authorities such as the TII and the NTA, to secure improvements to the County Road network – including improved pedestrian and cycle facilities, subject to the outcome of environmental assessment (SEA, EIA and AA), flood risk assessment and the planning process
T24: Motorway and National Routes	It is a Policy Objective to promote, facilitate and cooperate with relevant transport bodies, authorities and agencies to secure improvements to the County's Motorway and National Road network to provide, protect and maintain for the safe and efficient movement of people and goods both within and through DLR.
T27: Traffic Noise	It is a Policy Objective to ensure that traffic noise levels are considered as part of new developments along major roads/rail lines in accordance with best practice guidelines.
T29: Traffic Management	It is a Policy Objective to introduce Traffic Management Schemes on particular roads and in appropriate areas throughout the County to reduce vehicle speeds to an acceptable level and to reduce the potential for traffic congestion and associated vehicular emissions in urban areas.
T30: Street Lighting	It is a Policy Objective to provide and maintain street lighting on the public road/footway/cycleways throughout the County in accordance with commonly accepted best practice, the Council's public lighting masterplan and the upgrade of sodium lights to LEDs.
T31: Accessibility	It is a Policy Objective to support suitable access for people with disabilities, including improvements to transport, streets and public spaces. Accessibility primarily concerns people with reduced mobility, persons with disabilities, older persons and children
T32: Personal Safety	It is a Policy Objective to provide and support initiatives that will promote the personal safety of women and vulnerable users who are using all forms of public transport as well as motorists, cyclists and pedestrians. This would include all Luas, DART and bus stops, carparks, cycle parking facilities, laneways and other areas of common use. Initiatives could include well-lit surroundings, use of CCTV. There would also be an emphasis on placing entrances/exits to public transport and cycle facilities close to busy built up areas.

T33: Directional/Information/ Waymarking Signage	It is a Policy Objective to provide directional signage for amenities, tourist attractions and local attractions and along cycle and pedestrian routes (waymarking) at appropriate locations throughout the County in accordance with planning and traffic regulations.
SLO 148 Laughanstown/Shankill	To protect and safeguard the roundabouts on the approaches into Shankill village at St. Anne's Church and at the junction of Dublin Road (R119) and Quinn's Road.

Zoning Objectives

The majority of proposed works are within and along the existing public road where there is no specific zoning provided in the DLRCDP. The Proposed scheme runs adjacent to lands that have been zoned in the following areas:

Table 16: Zoning Objective of the DLRCDP	
Zones	
A	To provide residential development and improve residential amenity while protecting the existing residential amenities
A1	To provide for new residential communities and Sustainable Neighbourhood Infrastructure in accordance with approved local area plans.
SNI	To protect, improve and encourage the provision of sustainable neighbourhood infrastructure.
GB	To protect and enhance the open nature of lands between urban areas.
F	To preserve and provide for open space with ancillary active recreational amenities.
TLI	To facilitate, support and enhance the development of third level education institutions.
DC	To protect, provide for and/or improve mixed-use district centre facilities.
MTC	To protect, provide for and/or improve major town centre facilities.
NC	To protect, provide for and/or improve mixed-use neighbourhood centre facilities.
E	To provide for economic development and employment.
SDZ	Refer to Planning Scheme for Details (Strategic Development Zone).

Specific Policies in respect of Natural Heritage

Chapter 9 Open Space, Parks and Recreation and Chapter 10: Green Infrastructure and Recreation of the DCDP considers a range of policy objectives to protect and conserve natural heritage features. The following policies are noted.

Table 17: Natural Heritage Policies and Objective of the DLRCDP	
Policy Objective	Heading
OSR3	Future Improvements
OSR7	Trees, Woodland and Forestry
OSR8:	Greenway and Blueway Network
GIB2:	Landscape Character Areas
GIB18	Protection of Natural Heritage and the Environment
GIB19	Habitats Directive
GIB21	Designated Sites
GIB22	Non-Designated Areas of Biodiversity Importance
GIB24	Rivers and Waterways
GIB25	Hedgerows
GIB27	Green Belts

The following site specific objectives are noted:

Table 18: Site Specific Natural Heritage Policies and Objective of the DLRCDP	
Objective	Site
Designated/European Sites	Dublin Bay SACs/SPAs

	Loughlinstown Wood pNHA
Biosphere	Dublin Bay Biosphere
Parks	Upgrade and Improve Killgobbet Park Create Linear Park along the Loughlinstown river
Trees And Woodlands	Various Locations along route

Specific Policies in respect of Built Heritage

Chapter 11: Heritage and Conservation of the DLRCDP considers a range of policy objectives to protect and conserve built heritage features. The following policies are noted.

Table 19: Built Heritage Policies and Objective of the DLRCDP	
Policy Objective	Heading
HER1	Protection of Archaeological Heritage
HER2	Protection of Archaeological Material in Situ
HER7	Record of Protected Structures
HER8	Work to Protected Structures
HER9	Protected Structures Applications and Documentation
HER12	National Inventory of Architectural Heritage (NIAH)
HER13	Architectural Conservation Areas
HER14	Demolition within an ACA
HER16	Public Realm and Public Utility works within an ACA
HER20	Buildings of Vernacular and Heritage Interest
HER22	Protection of Historic Street Furniture and Public Realm
HER23	Industrial Heritage

The following site specific objectives are noted:

Table 20: Site Specific Built Heritage Policies and Objective of the DLRCDP	
Objective	Site
Architectural Conservation Area	Foxrock
Record of Monuments and Places	Ecclesiastical Site, Newtown Avenue
	Church Site, Stillorgan Road
	Mound, Cairn Hill
	Inn Site, Loughlinstown
	St Annes Church, Shankill
Protected Structures	Various Locations along route

6.4.2.2 Dún Laoghaire-Rathdown County Biodiversity Action Plan 2021-2025

The Dún Laoghaire-Rathdown County Biodiversity Action Plan 2021-2025 (DLR Biodiversity Plan) recognises that as an urban environment there are many challenges for biodiversity, nature recovery, restoration and reconnection are the core aims of the plan. The DLR Biodiversity Plan sets out five themes supported by objectives and actions - these themes are set out below:

- Reaching a deeper understanding of the County's Biodiversity.
- Making good decisions for biodiversity.
- Powerful actions to protect biodiversity and us.

- Connecting people and nature and inspire a positive future.
- Strength in working together.

Theme 2 is supported by Objective 2 “Mainstream biodiversity into decision-making and improve the management of this valuable resource”. The importance of Booterstown Marsh is acknowledged in the DLR Biodiversity Action Plan and Action 3.13 (referring to Theme 3) reflects this by stating “Protect and enhance Booterstown Marsh, an important, unique coastal area within DLR and an EU Natura 2000 site.” River/Coastal wildlife corridors are also identified along the coastline in the vicinity of the proposed scheme. Blackrock Park is also noted and identified as a Locally Important Biodiversity Site (LIBS). LIBS are areas that are outside of protected areas, but which form an integral part the ecological network.

6.4.2.3 Others Plans and Schemes

The following plans are also noted:

Table 21: Policies and Objective of Others Plans and Schemes	
Plan	Detail
Stillorgan - Local Area Plan 2018 – 2024 as extended LAP incorporates the general area at Stillorgan Road and underpass to Patrician Villas	The ‘Stillorgan Village Area Movement Framework Plan’, which should be read in conjunction with this LAP, offers a detailed design specification for the redesign of Stillorgan roads and streets, with a particular focus on: • Incorporation of cycle tracks throughout the centre of Stillorgan • New pedestrian crossings • Reductions in road widths and cross sections, to single carriageway in key locations • The establishment of a strong pedestrian link along an upgraded streetscape from the Shopping Centre eastwards directly to QBC bus stop on N11. • Re-location of southbound N11 bus stop northwards to be opposite the northbound bus stop and incorporating an at-grade pedestrian crossing as an alternative to the underpass. • Removal of slip lanes onto Upper Kilmacud Road to minimise cyclist / vehicular conflict.
Woodbrook - Shanganagh LAP 2017-2023 as extended LAP incorporates the general area from the coast to the M11/N11 from Crinken Lane to the Wilford Roundabout	T8: To seek to retain the sylvan character of the Dublin Road in any road improvement schemes and to ensure that any loss of mature trees will be mitigated by replacement tree planting with consideration also to the re-instatement of any historic walls or features along any new road alignment.
	T7: To co-operate with the National Transport Authority, Transport Infrastructure Ireland and Wicklow County Council in relation to on-going corridor studies in respect of the Dublin Road Core Bus Corridor M11 / N11 which will inform potential road infrastructure improvements and public transport provision both in the Plan Area and the wider environs.
	56 To investigate the potential upgrading of the Wilford Interchange to provide connectivity to lands west of the M11 and Old Conna Village with any such improvements to be informed by the outcome of the TII`s on-going Corridor Studies.
Trees and Urban Forestry Strategy 2024-2030	This strategy brings focus to the role of trees and the urban forest in climate action, mitigation and adaptation. Over its 7-year timeframe, the strategy will: support good decision-making on trees and the urban forest, enable knowledge sharing and upskilling, and promote meaningful partnerships between the many guardians of trees in the County

6.4.3 Wicklow County Council

A short section of the route is located in County Wicklow on the northern side of Bray. This area is within the area of the Wicklow County Development Plan 2022-2028 (WCDP) and Bray Municipal District Local Area Plan 2018-2024 (BLAP). The Wicklow County Council Tree Management Policy 2022 is also noted.

6.4.3.1 Specific Policy Objectives in respect of BusConnects

The main strategic goal of the WCDP is to facilitate a modal shift to more sustainable transport options by supporting investment programmes and any associated infrastructure development that deliver improvements to public transport infrastructure and services, in particular the upgrading of mass transit to Bray.

Chapter 12 of the WCDP relates to sustainable transportation and highlights that the integrating land use planning with transportation is key to addressing climate change, supporting economic prosperity and improving the quality of life.

In this regard CPO 12.26 states it is the policy:

"To promote the delivery of improved and new bus services both in and out of the County but also within the County by:

- *supporting the development and delivery of bus service enhancement projects, including BusConnects and measures to improve bus priority such as additional bus lanes and priority signalling etc as may be deemed appropriate; …...*

In addition to the WCDP, the BLAP sets out specific objectives also in respect of bus services. Given its adoption date it does not reference BusConnects directly.

To promote the delivery of improved and new bus services both in and out of the district but also within the district by:

- *facilitating the needs of existing or new bus providers with regard to bus stops and garaging facilities (although unnecessary duplication of bus stops on the same routes / roads will not be permitted);*
- *facilitating the provision of bus priority where a requirement for such is identified by the NTA;*

6.4.3.2 Related Policy Objectives in respect of BusConnects

There are numerous policies in Chapter 12 of the WCDP which support the principle of sustainable mobility. Related policies include:

Table 22: Policies and Objective of the WCDP	
Policy/Objective	Detail
CPO 12.1 – 12.6	Sustainable Mobility Objectives
CPO 12.7 – 12.10	Climate Action & Environmental Protection Objectives

CPO 12.11 – 12.19	Cycling & Walking Objectives
CPO 12.20 – 12.28	Public Transport Objectives
CPO 12.29 – 12.34	General Road Objectives
CPO 12.35 – 12.42	National Road Objectives
CPO 12.43 – 12.48	Regional Road Objectives
CPO 12.49 – 12.54	Local Road Objectives
CPO 12.56 – 12.58	Parking Objectives
CPO 12.67 – 12.73	Roadside Signage Objectives

In addition to the WCDP, the BLAP sets out related objectives also in respect of BusConnects. The plan identifies the provision of adequate infrastructure, including public transportation, is critical to facilitate and sustain the growth of the Bray Municipal District over the lifetime of the plan.

Table 23: Policies and Objective of the BLAP	
Policy/Objective	Detail
PT1 – PT7	Public Transport Objectives
CW1 – CW4	Cycling and Walking Objectives
RO1 – RO12	Road Objectives

6.4.3.3 Zoning Objectives

The majority of proposed works are within and along the existing public road where there is no specific zoning provided in the BLAP. The Proposed scheme runs adjacent to lands that have been zoned in the following areas:

Table 24: Zoning Objective of the BLAP
Zones
RE Existing Residential
R-HD New Residential
TC Town Centre
NC Neighbourhood Centre
OS1 Open Space

6.4.3.4 Specific Policies in respect of Natural Heritage

Chapter 10: Green Infrastructure and Recreation of the WCDP considers a range of policy objectives to protect and conserve natural heritage features. The following policies are noted.

Table 25: Natural Heritage Policies and Objective in County Wicklow			
WCDP		BLAP	
CP0 17.1-17.3	General Natural Heritage & Biodiversity	B1-B4	Biodiversity
CP0 17.4-17.11	Protected Sites and Species	G1-G5	Green Infrastructure
CP0 17.12-17.17	Sites & Corridors of Ecological & Biodiversity Value		
CP0 17.18-17.23	Woodlands, Trees and Hedgerows		
CP0 17.35-17.38	Landscape, Views & Prospects		

The following site specific objectives are noted:

Table 26: Site Specific Natural Heritage Policies and Objective	
Objective	Site
Blue Green Corridors	River Dargle
Designated/European Sites	Dublin Bay SACs/SPAs
Tree Preservation Orders	B20 Ravenswell School Large Pine right of entrance

6.4.3.5 Specific Policies in respect of Built Heritage

Chapter 8: Built Heritage of the WCDP considers a range of policy objectives to protect and conserve built heritage features. The following policies are noted.

Table 27: Built Heritage Policies and Objective in County Wicklow			
WCDP		BLAP	
CPO 8.1-8.9	Archaeology	AH-AH5	Archaeology & National Monuments
CPO 8.10-8.12	Architectural Heritage		
CPO 8.13-8.17	Record of Protected Structure		
CPO 8.18-8.20	Other Structures & Vernacular Architecture		Architectural heritage, including the Record of Protected Structures, vernacular structures, and Architectural Conservation Areas
CPO 8.25-8.28	Historical & Cultural Heritage		Historical & Cultural Heritage

The following site specific objectives are noted:

Table 28: Site Specific Built Heritage Policies and Objective	
Objective	Site
View and Prospect	South near Castle Street Bray
Area of Archaeological potential and Significance	Castle Street Bray
Record of Monuments and Places	Castle Street Bray
Protected Structures	Dublin Road and Castle Street Bray

7.0 Legal Context

7.1 Environmental Impact Assessment

Annex I to Directive 2011/92/EU as amended by Directive 2014/52/EU requires as mandatory the preparation of an EIA for all projects listed therein. Projects listed in Annex II to the Directive are not automatically subjected to EIA. Member States can decide to subject them to an assessment on a case-by-case basis or according to thresholds and/or criteria (for example size, location, sensitive ecological areas and potential impact).

Screening is the term used to describe the process for determining whether a proposed scheme requires an EIA by reference to mandatory classes of development and legislative threshold requirements or by reference to the type and scale of the proposed scheme and the significance or the environmental sensitivity of the receiving baseline environment.

Section 50 (1) of the Roads Act 1993, as amended relates to road developments that require EIA. The thresholds for mandatory EIA of a road development are set out in Section 50 (1) (a). The prescribed types of proposed road development for the purposes of Section 50 (1) (a) (iv) are set out in Article 8 Roads Regulations 1994 and includes for the following:

"The construction of a new road of four or more lanes, or the realignment or widening of an existing road so as to provide four or more lanes, where such new, realigned or widened road would be eight kilometres or more in length in a rural area, or 500 metres or more in length in an urban area"

On this basis the applicant has submitted an EIAR.

7.2 Appropriate Assessment

Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora ('the Habitats Directive') is European Community legislation aimed at nature conservation. The Habitats Directive requires that where a plan or project is likely to have a significant effect on a European site(s) (i.e. Special Protection Areas (SPAs) and Special Areas of Conservation (SACs)), (and where the plan or project is not directly connected with or necessary to the nature conservation management of the European site), the plan or project will be subject to AA to identify any implications for the European site(s) in view of the site's Conservation Objectives

Case law of the European Court of Justice (ECJ) has determined that AA is required if likely significant effects cannot be excluded on the basis of objective information. Case law has also clarified that measures intended to avoid or reduce harmful effects on European sites, must not be considered when determining whether it is necessary to carry out an AA.

The applicant in this instance has screened in the requirement for AA.

8.0 Submissions

8.1 Planning Authorities

8.1.1 Dublin City Council

The submission from DCC is largely supportive of the proposed scheme and they have identified a number of key policies which underpins this support. The planning authority has provided a detail response however on various specific issues that were raised by the various sections in it. It is noted that DCC have also included a list of conditions in Appendix 1 of its submission that it requires are applied should the Board be minded to the grant planning permission.

- In terms of development management, DCC is of the view that the proposed development is in compliance with its various policies and zoning objectives. It also notes several strategic housing developments were not identified by the applicant. DCC has provided a list of planning histories in this regard.
- The forward planning section is also satisfied that the proposed scheme aligns with the DCDP. However, they seek additional green space as set out provisions for greening and green infrastructure. It also notes the significant loss of trees along the proposed scheme and seeks measures to retain trees where possible.
- The submission from traffic section raised the traffic control systems and the management of traffic during the operational phase of the proposed scheme. They seek integration with their systems like Vissim and adaptive traffic controls systems like SCATS. They all need to be integrated to ensure the proposed scheme operates efficiently and holistically across the wider transport and travel network. They also raise concern about the monitoring and enforcements of left-turn bans and bus gates and suggest that camera based enforcement is required across the scheme.
- The roads section examines pedestrian features associated with the proposed scheme and suggests improvements could be made at certain bus stops to ensure the safety of cyclists and pedestrians. They also request full consideration of the impact to loading bays and on street parking along the proposed scheme. They have provided comments in respect of the proposed scheme on Sheet 1-11 of the submission.

- The Active Travel Programme Office (AcTprO) has responsibility for improving walking and cycling in the city. Again, they are concerned about the integration of pedestrian and cyclists at junctions. They also seek the integration with other active travel projects which the proposed scheme interacts with.
- The environmental section seeks compliance with the Greater Dublin Regional Code of Practice for Drainage Works and in particular the integration of SuDs measures. The SUDS can be design along with the proposed landscaping scheme. They raise the Water Framework Directive specifically and the requirement to maintain good water quality across the scheme. It is also concerned with flooding and the plans for drainage along the proposed scheme. They request that this is considered in full in the Board's assessment.
- The archaeology section highlights the various built heritage features across the proposed scheme in including Recorded Monument DU018-020 (Historic City) and Recorded Monument REMP DU018-060/022-082 – Settlement at Donnybrook). It highlights in various policies for protection and preservation of archaeology, particularly in the DCCDP. They also highlight the features of Dublin's Industrial Heritage which should also be considered such as the canal, former tram tracks and coal holes for examples. They set out various conditions for preservation of any finds along the route.
- The conservation sections highlights the impact to trees and the provisions of the Dublin City Tree Strategy 2016-2020. It also highlights the Architectural Heritage Protection Guidelines for Planning Authorities (2011) and seeks the protection of historic paving and iron works along the proposed scheme. It also sets out the various features identified in the DCDP including the protected structures, conservation areas and ACAs.
- The architects division of DCDP seeks conditions and future engagement in relation to the design of the proposed development particularly for areas identified as public realm. This request relates to a range of features and furniture with the intention of ensure a consistent urban design and public realm.
- The city parks and biodiversity section is concerned about the hand-over arrangements when DCC is required to take this scheme in charge. The proposed scheme has extensive maintenance requirements.

- It requires measures to be put in place to ensure establishment of any landscaping proposals. In the long term It also raises the issue of compensatory planning and requests the applicant liaise with it to ensure there is no overall loss in the number of trees and to ensure trees are planted and have appropriate protections and are in appropriate locations.

8.1.2 Dún Laoghaire-Rathdown County Council

The DLRCC submission is also supportive of the proposed scheme. Similar to DCC, its submission contains comments from the various sections.

- In terms of planning policy, the proposed scheme is consistent with the strategic outcomes for travel and transport in the DLRCDP and delivering wider settlement policies. A modal shift is required to achieve this strategic outcome. The submission also notes the various local area plans along the proposed scheme which may interact with it.
- The traffic and travel section provides comments in relation to the active travel infrastructure design and ensure visibility of traffic signals. They seek monitoring of junctions once the scheme is implemented to ensure they are working successfully for all modes and in particular vulnerable road users. They also seek a condition that the final design be fully considered by the DLRCC prior to its implementation to ensure all requirements of DLR and included by the NTA. The removal of roundabouts in Quinns Road, Shankill is also queried. It is their view that its removal may not be the most practicable option. It also notes a development plan objective, SLO148, which seeks to specifically protect this roundabout. They also seek additional traffic calming measures in Shankill including a 30km/h speed limit. They also request consideration of a two-way cycle track between Bray and Shankill on the eastern side of the carriageway at Shanganagh Park. It also raised integration with existing active travels schemes at Loughlinstown and ensuring connectivity to Cherrywood SDZ.
- A key concern from the landscape and biodiversity sections is the loss of trees which is significant along Section 3 of the proposed scheme. The trees are a key component of the landscape character at this location. The submission also highlights the importance of Age Friendly and relevant accessibility guidelines in the design of the proposed development.

- The conservation department also seeks the incorporation of heritage features into the proposed scheme where appropriate in line with the Heritage Plan for the county.
- In terms of drainage, roads, maintenance, public light and pollution control, DLRCC seeks compliance the integration of SuDs measures with the proposed scheme. There is a range of conditions requested in respect of drainage and pavement design. The submission highlights the practical cleaning requirements of the proposed scheme during operation also. It is noted that the council are currently carrying out upgrades to pavement across the county and ask that the proposed scheme is conscious of this when carrying out construction. The applicant also requests a comprehensive lighting design.
- The council's property management section has considered the CPO elements of the proposed scheme and provides specific advice in Appendix 3 and seeks its consideration.

8.1.3 Wicklow County Council

The submission from WCC includes comments from elected members and the executive. The elected members seek that the NTA remove the bus lane planned for Castle Street, Bray given the impact it would have on the community and business in the vicinity. The comments from various executive sections of WCC are generally supportive of the proposed scheme.

- The transportation, water and emergency services section are satisfied that the proposed scheme would achieve key objectives in the WCDP and Climate Adaption Strategy for County Wicklow. However, they do seek further consideration on the impact to Castle Street as a result of the widening. In particular, they seek the minimisation in the loss of car parking where possible. The future development of a bus priority scheme on the Upper Dargle Road is also noted which would integrate with the proposed scheme and unlock lands in the Fassaroe area of Bray. They are also concerned about the traffic and transport impacts as a result of the removal of the roundabout at the Wilford junction. It may have a significant impact on the wider traffic flows in the Bray area. WCC also seeks an extension of the scheme to Ballywaltrim where the E-spine of BusConnects will ultimately end.

8.2 Prescribed Bodies

8.2.1 Department of Housing, Local Government and Heritage (DAU)

- The Department has provided a submission in respect of archaeology and flora and fauna.
- In terms of archaeology, seek implementation of Condition C5 and C6 in the OPR Practice Note.
- The potential existence of bats is also noted by the DAU and they seek further surveys to establish their locations and requests the applicant seek the relevant derogation if required.
- The impact to birds as a result of the removal of trees, particularly at Shankill is noted by the DAU. They recommend reviewing the need to remove these trees.
- The DAU notes that orchids may be located near Loughlinstown Roundabout and greater knapweed near Stonebridge. These should be protected from any damage during the construction phase.
- Overall, the DAU seeks the implementation of a CEMP to ensure that any impact to flora and fauna in the vicinity of the proposed scheme are mitigated

8.2.2 Transport Infrastructure Ireland

TII understand the need for the proposed scheme and the support for it in the governments transport and climate policies. However, their statutory remitted relates to the protection of safety capacity and strategic function the national road network and rail projects like Luas.

- The proposed scheme interacts with the national road at motorway network at M50/M11 Junction 17 and M11 Junction 5 Bray North. TII require adherence with all its relevant policies and guidelines and that they are consulted prior to the implementation of the proposed scheme. This is to ensure the maintenance of a safe and efficient national road network.
- There is a specific concern about the M11 Junction 5 Bray North and proposed design of the Wilford Roundabout junction where the safe operation of the M11 may be impacted. A primary concern of TII is that the design will result in queuing on the motorway. This is similarly the case at the Loughlinstown Roundabout and further mitigations may be required to ensure the safe operation of the national road network.

- TII request that additional consultation occurs and relevant agreements are put in place with the relevant contractors to ensure all measures are taken during construction to ensure the safe operation of the national road network.
- The TII has also identified the works to St Laurence's underpass at Patrician Villas and requests that the applicant ensure all technical requirements for such infrastructure is implemented.
- TII specifically request that it is a primary consultee for the CEMP when it is prepared to ensure all relevant technical matters are incorporated and relevant mitigation measures implemented.

The Board should note that a further submission was received from TII in July 2024 which reiterates a number of the points made above and recommends mitigation measures and conditions be implemented to ensure safe operation of the national road network is maintained.

8.3 Observations to SID Application

Table 29 and 30 sets out the number of submissions made in respect of the files. The observers are listed in Appendix A.

Table 29: Number of Submissions (2023)	
	Total
ABP-317742-23 (HA)	217

The observation are summarised thematically below due to the overlapping issues of many submissions. Many submissions have an overarching statement that state they do not oppose such a mobility project in principle; however, such projects need to demonstrate that they do not have an adverse impact on the environment and are in compliance with the relevant provisions of plans for the area.

Should the Board require a summary of the submissions received I would refer them to the NTA Observations on the Proposed Scheme Submissions - Table 2.1: Summary of Key Issues Raised in Submissions by Geographic Location.

The applicant responded to these submissions in May 2024. The response considered each individual submission and for the most part repeated information contained in the EIAR that may be relevant to the observers or objectors concern or property.

Following the response to observations by the applicant. The observers were given another opportunity to make a comment. This resulted in additional submissions set out below.

Table 30: Number of Submissions (2024)	
	Total
ABP-317742-23 (HA)	89

These submissions generally reiterated the grounds set out in their initial submission or expanded on the grounds already raised. However, no new material issues were raised in any of these submissions. These submissions also considered the response by the NTA generally dissatisfactory and does not address their concerns specifically or directly.

8.3.1 Impacts to Traffic & Transport

- A modal shift is occurring as a result of changing work practices -predominantly from office-based working to hybrid working or working from home. The proposed scheme does not take this into account.
- Other measures should be exhausted before carrying out the proposed scheme, including efficiencies in bus operations, including increasing the number and frequency of buses, reducing dwell times, removing driver changeover in Donnybrook, making fare payment more efficient, enforcement of bus lane use, bus lane operating hours.
- The proposed scheme would result in increased speeds along the route and make the roadway unsafe for vulnerable road users. Measures such as signage, speed limitations (30 km/h), traffic calming and footpaths (along Bray Road) should be included now, not later to ensure motorist behaviour is managed.
- The removal of slip lanes, in particularly those facilitating left turns would have a significant impact on traffic and transport in the area. It is requested that motorist able to use bus lanes at junctions where slip roads are removed should they not be retained.
- The removal of parking spaces, particularly adjacent to commercial properties, would have a significant impact on traffic and transport in the area. It is requested in most cases that they be retained.
- The traffic and transport analysis does not address the potential reduction in benefits if the Shankill section of the scheme were removed. The cost of

interventions in Shankill is disproportionately high compared to the benefits that would be derived and much higher than costs elsewhere on the scheme.

- A cumulative assessment in required with respect to traffic and transport impacts with other mobility projects currently being planned or undertaken in the area, including:
    - All other BusConnects Schemes;
    - Deansgrange Road Mobility Project;
    - Woodbrook Dart Station and enhancement to Dart Services;
    - Continuation of Metro North to South Dublin
    - M11/N11 Alternative Route
- Several observations consider that the proposed scheme is not consistent with the DMURS, this is particularly the case for the design of junctions, pedestrian crossings, bus stop islands, shared spaces.

8.3.1.1 Impact to Junctions

The proposed scheme would result in unacceptable impacts to the operation of these junctions.

- St Stephen's Green South (Retention of Slip Lanes)
- Leeson Street Lower (Bus Gate)
- Beaver Row/Anglesea Road (Removal of Slip Lanes)
- Donnybrook Castle (Access/Egress)
- Booterstown Avenue (Removal of Slip Lanes)
- Mount Merrion Avenue (Removal of Slip Lanes)
- Stillorgan Park Road (Removal of Slip Lanes)
- The Hill Road (Closure of Exit)
- Whites Cross (Leopardstown / Newtownpark) (Retention of Slip Lanes)
- Belmont Terrance at Galloping Green (Blindspots)
- Kill Lane (Removal of Slip Lanes)
- Clonkeen Road (Removal of Slip Lanes)
- Johnstown Road (Removal of Slip Lanes)
- Wyattville Road (Not legible for northbound cyclists)
- Seaview Park (Absence of Access/Egress Measures)
- Rathmichael Woods (Absence of Access/Egress Measures)

- Corbawn Lane / Shanganagh Road (Removal of Roundabout)
- Quinn's Road (Removal of Roundabout)
- Shanganagh Park (Absence of Pedestrian Crossings)
- Woodbrook Lands (SHD 305844) (Requirements of Land Take)
- Corke Abbey Avenue / Old Connaught Avenue (Removal of Slip Lanes)

8.3.1.2 Impact to Parking Spaces

The removal of car parking spaces, predominantly as a result of CPO, will result in a significant impact to the business operations at these locations and inhibit the enjoyment of these private properties.

- Morehampton Road (Donnybrook Fair (Removal)
- Donnybrook Road (Mola Architecture) (Removal)
- Dargle Centre (Removal)
- Castle Street and Castle Street Shopping Centre (Removal)

8.3.2 Impact to Residential Amenity

The proposed scheme would impact traffic and transport, air quality, climate, noise and vibration, human health, landscape and visual and material assets as a result of the:

1. loss of public and private green space, stone walls trees, other screening and privacy/overlooking
2. increase in visual impact, health (physical and mental) impact, decrease in property value and related issues such as anti-social behaviour
3. increase in air, noise and light pollution during the construction and operation phases of the proposed scheme,
4. increase in indirect traffic and transport impacts as a result of changing behaviours including ad-hoc parking, rat-running through residential areas.
5. alterations to existing access and egress arrangements

- Marlborough Road (4)
- Donnybrook Castle (1, 5)
- Patrician Villas (1, 2, 3, 4)
- The Grange (5)

- Galloping Green (5)
- Leopardstown Road (4)
- Foxrock Avenue (4)
- South Park (1, 2, 3, 4)
- Shanganagh Vale (1, 2, 3, 4)
- Willow Avenue (5)
- Seaview Park (1, 2, 3, 4, 5)
- Woodbank (1)
- Stonebridge Road (1)
- Shankill Village General (1, 2, 3, 4, 5)
- Dorney Court (1)
- Residential Areas east of Dublin Road at Shankill Village (5)
    - Corbawn, Eaton Wood, Foxes Grove, Quinn's Road, Shanganagh Grove, St Anne's Park, Shrewsbury Road, Cluain na Greine
- Residential Areas west of Dublin Road at Shankill Village (5)
    - Cherrington, Mountain View, Olcovar
- The Bridge (5)
- Sherrington Lodge (5)
- Woodbrook Lands (SHD 305844) (1, 2, 3, 4)
- Property at Askefield (1, 2, 3, 4)
- Other Individual Properties (1, 4, 5)

8.3.2.1 Impact to Shankill Village

- The village of Shankill should not be used as the route of an inter-urban corridor between Dublin City and Bray/Greystones. Shankill is already well serviced by public transport. The village already experiences 'rat-running' and the proposed scheme would exacerbate this.
- All bus services from Bray/Greystones should utilise the M11/N11 (Route 2A) which is due to accommodate a bus lane anyway. The route selection does not consider this fact.
- The character of the village will be significantly impact as a result of the proposed scheme and discourage mobility impaired, school children and other vulnerable road users such as pedestrians from using the road network.

- There is no evidence that bus times will be increases through the village as a result of the proposed scheme. It will only result in a saving of 7–10-minute journey time.
- Cyclists will, by and large share road space with buses and motor vehicles, thereby presenting a significant safety risk (as confirmed in the Road Safety Audit) which results in the proposed scheme not achieving its stated objectives particularly with regard to the integration of cycling.
- The proposed scheme at Shankill will not deliver the wider objectives of the project and the cost of the interventions in Shankill would not result in any significant improvements and would generally be a poor return on Investment.

8.3.2.2 Impact of Permeability Measures

A common issue is the opening of walls/tree stands to facilitate pedestrian access to the proposed scheme from adjoining residential areas. These openings will impact residential amenity (as set out below) and there is a general concern such measures will generate anti-social behaviour and safety issues for residents.

- Patrician Villas (at Stillorgan Road)
- South Park (at Bray Road)
- Shanganagh Vale (on bend in road)

8.3.3 Impact to Social, Community, Commercial Amenity/Operation

The proposed scheme would impact to traffic and transport, air quality, climate, noise and vibration, human health, landscape, visual and material assets and operation and amenity of these social, community and commercial properties as a result of:

1. loss of public and private space, stone walls trees, other screening and privacy/overlooking
2. increase in air, noise and light pollution during the construction and operation phases of the proposed scheme,
3. increase in indirect traffic and transport impacts as a result of changing behaviours.
4. alterations to existing access and egress arrangements, loss of parking;
5. disruption to operations both temporarily and permanent

- St. Stephen's Green Area (3,4, 5)
- Morehampton Road (Donnybrook Village) (3, 4, 5)
- 2-12 Donnybrook Road (3, 4, 5)
- Commercial Premises opposite Donnybrook Stadium (3, 4, 5)
- Coláiste Eoin (1, 3, 5)
- Foxrock Church (4)
- Deansgrange Village (3)
- Rathmichael National School (1, 2, 3, 4)
- Beechfield Manor Nursing Home (1, 2, 3, 4)
- St Annes Roman Catholic Church (4)
- The Barbeque Centre (4, 5)
- Shankill Tennis Club (5)
- Emergency Access to Rail Line (at Corbawn Lane/Quinn's Road) (5)
- Shanganagh Park and Cemetery (5)
- Shanganagh Marble & Stone Centre (1, 2, 3, 4)
- Crinken Church (1, 2, 3, 4)
- Woodbrook College (1, 2, 3, 4)
- Windsor Bray (3, 4, 5)
- Circle K Bray (3, 4, 5)
- Dargle Centre (3, 4, 5)
- Castle Street Shopping Centre (3, 4, 5)

8.3.4 Impact to the Built Heritage

This is predominantly as a result of the alteration or removal of stone walls which would have a significant impact on to the character and amenity of these location. The proposed scheme would also impact on the character of protected structures and their curtilage.

- Morehampton Road (impact to protected structure)
- Shankill Village (removal of walls)
- Property at Askefield (removal of walls and impact to protected structure)
- Shanganagh Marble and Stone Centre (impact to protected structure)
- Woodbrook Lands (SHD 305844) (Alteration of Existing Wall)
- Woodbrook House (removal of walls and impact to protected structure)

- Woodbrook Side Lodge (demolition and rebuilding of protected structure)
- Beauchamp House (removal of walls and impact to protected structure)

8.3.5 Impact of Natural Heritage

This is as a result of the removal or trees, tree stands, hedges, hedgerows which would have a significant impact on to the character, amenity and biodiversity of these locations. There would be a significant impact on flora and fauna, in particular bat species. There are queries on the extent of bat surveys also. Any replacement planting would take years to reach maturity and achieve its current ecological value.

- Patrician Villas (for permeability measures)
- South Park (for permeability measures)
- Opposite Seaview Park (for road widening)
- Shankill Village (for road widening)
- Dorney Court (for a construction compound)
- Woodbrook Lands (SHD 305844) (for road widening)
- Beauchamp House (for road widening)
- Property at Askefield (for road widening)
- Woodbrook House (for road widening)

8.3.6 Alternative Options Proposed

There is little assessment of reasonable alternatives provided for the proposed scheme and there may be more suitable options available that would have a lesser environmental impact.

- Morehampton Road - retention of car parking along commercial properties.
- Patrician Villas – Avoid land take by removing central median.
- Shankill Village – Utilise M11/N11 for bus lanes.
- Shanganagh Park – Fully Controlled Junction
- Woodbrook Lands (SHD 305844) – Existing path be retained.
- Willford Roundabout – Retention of Roundabout
- Old Connaught Intersection – Insertion of Roundabout
- Industrial Yarns – Insertion of Roundabout
- Supervalu Bray – Insertion of Roundabout

8.3.7 Contravention of Conventions, Polices, etc.

- Charter of Fundamental Rights of the EU
- Aarhus Convention
- Design Manual for Urban Roads and Streets
- DCDP
- DLRCDP
- DLR Tree Strategy
- DLR Biodiversity Plan
- Shanganagh-Woodbrook LAP

8.3.8 General Issues

- Lack of public consultation
- Misleading and contradictory Information provided during public consultation and in documents submitted as part of the planning application.
- Lack of Detail and Construction Methodology in respect of the proposed scheme and in particular on lands which are the subject of CPO. There is misleading and contradictory Information provided during public consultation and in documents submitted as part of the planning application.
- Environmental Impact Assessment (EIA) Directive Failures
- Habitats Directive Failures

9.0 Planning Assessment

The proposed scheme is an upgrade to the existing bus priority, cycle facilities and pedestrian infrastructure associated with large sections of the Stillorgan/Bray QBC which has been in place for several decades. It will also see additional bus priority, cycle facilities and pedestrian infrastructure in Section 3 Loughlinstown Roundabout to Bray North (Wilford Roundabout) and Section 4 Bray North (Wilford Roundabout) to Bray South (Fran O'Toole Bridge) of the proposed scheme in particular.

The proposed scheme includes an increase in the level of bus priority including the provision of additional lengths of bus lane (+ 7.8 km), particularly between Loughlinstown Roundabout through Shankill to Bray resulting in improved journey time reliability according to the NTA. It will bring the proportion of the route with bus priority measures from 69% to 99.60%.

Throughout the proposed scheme cycle facilities will be substantially improved with segregated cycle tracks provided along the links and protected junctions with enhanced signalling for cyclists provided at junctions. The total amount of segregated cycle facilities will increase by 16 km.

Pedestrian facilities will also be upgraded, and additional signalised crossings (+ 57) 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 experience.

This application is accompanied by a CPO 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 the proposed scheme. The total number of residential properties with land acquisition is 56.

Given the variety of issues raised within the submissions received, I will consider them on a themed or locational basis within the relevant sections of the report hereunder. I have read the entire contents of the file including the Planning Report, EIAR, NIS and all supporting documentation submitted with the application. I have visited the subject site and its surroundings on several locations. I have read in full the observations submitted in respect of the application including the third-party observations, the observations from the planning authority and the observations from

prescribed bodies. I consider the critical issues in determining the current application and appeal before the Board are as follows:

- Principle of the Development
- Detailed Design
- General Design
- Adequacy of Consultation

Having regard to the requirements of the PDA, the wider assessment of the proposed scheme is divided into three main parts: planning Assessment, EIA and AA. In each assessment, where necessary, reference is made to issues raised by all parties. There is an inevitable overlap between the assessments, for example, with matters raised falling within both the planning assessment and the environmental impact assessment. In the interest of brevity, matters are not repeated but such overlaps are indicated in subsequent sections of the report.

9.1 Principle of the Development

According to the NPF, the population of the GDA is forecast to increase by 25% by 2040 and this growth will have associated travel demands, placing added pressure on the transport system. There is significant congestion already throughout the GDA from private car dependence and intervention is therefore now required. The intervention will optimise road space and prioritise the movement of people over the movement of vehicles.

Following COVID-19, travel patterns changed in the GDA as the population work from home remotely. This resulted in few people using public transport. However, in the past few years, travel demand patterns are rising again to levels seen before the pandemic. This is expected to rise in line with population growth.

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 and conflicts with cyclists and parking and are not always operational on a 24 hour basis.

As noted above, an overriding motivation for BusConnects is to reduce CO_2 emissions and this is critical in the context of CAP24. BusConnects is specifically identified and supported within the CAP24 and is seen as a key action under the

major public transport infrastructure programme to deliver abatement in transport emissions. BusConnects 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. BusConnects is also seen as an economic driver within the cities which currently experience significant congestion and impediments to movement and accessibility.

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 and CO_2 emissions and of all of the associated issues highlighted above. The dependence on Private cars will continue to worsen unless there is intervention.

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. It is noted that a double-deck bus takes up the equivalent spatial area of three cars but typically carries 50-100 times the number of passengers of a car.

When buses are prioritised over the private cars and more space is created for pedestrians and cyclists there will be increased people movement capacity along the bus corridor. The proposed scheme is expected to see an increase of 40% in the number of people travelling by bus, an increase of 108% in people walking or cycling, and a reduction of 49% in the number of people travelling by car along the route of the development as calculated in the 2028 AM Peak Hour People Movement Assessment.

Having regard to the above, BusConnects 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. BusConnects 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. BusConnects also has the potential to reduce Ireland’s greenhouse gas emissions significantly. The proposed scheme will therefore make a contribution to carbon reduction, the easing of congestion and the creation of more sustainable travel patterns for the growing population.

BusConnects is identified as a component of a Strategic Investment Priority which is a factor in the delivery of the NPF. The proposed scheme is also consistent will all levels national, regional and local policy relating to climate action and sustainable transport provision.

In terms of local transport need it is outlined by the applicant that bus priority infrastructure is currently provided along approximately 69% (outbound) and 68% (inbound), cumulatively equating to 69% of the length of the route. The proposed scheme will facilitate 98.6% bus priority and complement the rollout of the Dublin Area Bus Network Redesign to deliver improved bus services on the route. This will improve journey times for bus, enhance its reliability and provide resilience to congestion.

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 wider BusConnects, including the proposed scheme, are developed to provide improved existing or new interchange opportunities with other existing and planned transport services in particular with existing Dublin Bus and other bus services and the GDA Cycle Network Plan.

The applicant states that existing mandatory cycle tracks are provided on approximately 51% outbound and 43% inbound of the route. There is also advisory cycle lanes are provided on approximately 40% outbound and 41% inbound on the route. The remaining extents have no dedicated cycle provision or cyclists must cycle within the bus lanes provided. Cycle facilities will increase to approximately 91% segregated compared to 48% existing segregated cycle tracks. The improvements to cycle infrastructure will vastly improve the current offer to cyclists and by doing so will significantly increase the modal share.

It is important to note that the Bray BusConnects 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. The attention of the Board is drawn to the relevant development plan zonings and planning history provided as part of the planning application particulars which list significant areas of land zoned for residential uses as well as extant and future residential planning applications along the route. This includes, among others, a scheme on the RTÉ Campus in Montrose, schemes for sites at Stillorgan LeisurePlex and the former Blakes and

Esmond Motors Cherrywood Strategic Development Zone Planning Scheme (SDZ), sites at Shanganagh Castle and Woodbrook under the Shanganagh-Woodbrook LAP 2017-2023 as extended, among others. These lands will accommodate significant population growth in this area.

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, notwithstanding its proximity to DART and Luas infrastructure, to the most vulnerable in society in a safe, well-lit and protected environment.

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

9.2 Detailed Design

The overall objective of the proposed scheme design is to provide efficient, safe, and integrated sustainable transport movement along the corridor. Its design is largely based on DMURS and the Cycle Design Manual which sets out broad principles for the design of urban roads and streets. DMURS is a high level documents and has been conceptualised for the site specific context of this site in a bespoke design document, called the Preliminary Design Guidance Booklet (PDGB). This booklet has been developed as a tool for the design of the BusConnects scheme across the city. The PDGB is entirely appropriate and generally consistent with the principles in DMURS. 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.

This is useful reference for the design justification of the proposed scheme and, as set out in subsequent section, the design of the proposed scheme largely complies with the requirements of DMURS and the Cycle Design Manual. The applicant has been circumspect in presenting any non-compliance with these design manuals as it arises. Such non-compliance is justified in several tables in the EIAR. It accepted that the applicant sought to achieve the standard in DMURS but through public

consultation and engagement and the existing constraints of the site compromises in the design were made.

This is entirely acceptable and inevitable in the course of such a scheme. It aligns with an iterative design approach as required by EIA guidance to avoid the most significant of impacts. There may simply be physical constraints given the highly developed environment in which it is located and where compromises are required to balance competing impacts - such as residential amenity, landscape and visual and built heritage for example. While certain observers point to the fact that the proposed scheme does not comply with the design manuals and other design standards on one hand, on the other hand they are concerned about the impacts of traffic, residential amenity and access/egress. Such is the challenge in designing this scheme and the NTA, to their credit, have sought ensure a balance is struck in the design of the scheme and to ensure it works for all. Slavishly implementing the design manuals in this instance is impossible or would result in increased impacts on communities and individuals along the scheme. I am satisfied the approach taken to the design manuals is entirely proportionate and balances the needs of the scheme with the environment and social impacts.

In terms of the current baseline conditions, the Board should read the Traffic and Transport section of the EIA set out below. It should 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.

In respect of every proposed change to the current road, I could spend time detailing and assessing each design change along the route, down to the location of every signpost and indeed the sequence of pedestrian push buttons - such is the level of detail provided by the applicant. But in the interest of brevity, this not entirely helpful, and instead it is my intention to focus purely on key areas of design and locations in which issues were raised by observers and that I, in my review of the proposed scheme, considered an issue. Otherwise, and unless noted, the Board can be satisfied that the proposed design is entirely appropriate and generally consistent with the principles in DMURS and the Cycle Manual and rely on the justifications for same set out by the applicant in the documents supporting the proposed scheme.

9.2.1 Section 1 Leeson Street to Anglesea Road Junction;

9.2.1.1 Junction at St. Stephen's Green East with Leeson Street Lower (Bus Gate)

The proposed junction design and bus gate at St Stephen's Green East with Leeson Street Lower is entirely appropriate and generally consistent with the principles in DMURS (Vehicle Permeability, Bus Services, Junction Design).

It will prioritise buses to improve journey times by restricting other private vehicles. The section along Leeson Street Lower and Upper, starting from St Stephen's Green, now features continuous bus priority and dedicated cycle tracks in both directions. Inbound traffic will be redirected from Leeson Street Lower to Hatch Street Lower, then to Earlsfort Terrace to access St Stephen's Green. The bus gate will result in the relocation of a number of bus-stops and the introduction of several coach stops. These are generally well positioned. The lack of bus shelters at this location is noted but given the limited footpath width, level of pedestrian footfall and the frequency of buses at this location, it is considered acceptable.

I note the submission of Mr Brendan Heneghan in respect of this junction. It is of the view that traffic arrangement should not change at this location and the junction operates as a key east-west route in the city. This is noted; however, I am satisfied that the proposed design, with priority to sustainable modes, is the best approach to addressing congestion at this location. The do-nothing scenario and retention existing traffic arrangements would simply result in additional congestion. I am satisfied that the EIAR has fully considered the traffic and transport implications at this junction and meets the objectives of the proposed scheme. I am satisfied that it complies with the *Draft Dublin City Centre Transport Plan 2023* which is fully cognisant of BusConnects and its implications.

9.2.1.2 Traffic Arrangement at Earlsfort Terrace and Hatch Street

The proposed two-way general traffic on Earlsfort Terrace between Hatch Street Lower to facilitate the bus gate on St Stephen's Green East/Leeson Street Lower is entirely appropriate and generally consistent with the principles in DMURS (Vehicle Permeability, Bus Services, Junction Design).

This will result in the conversion of the northbound bus lane on Earlsfort Terrace to a general traffic lane. Additionally, the previous left turn prohibition from Earlsfort

Terrace towards Stephen's Green North has been lifted to support the new traffic flow. The removal of a bus lane on Earlsfort Terrace will have an impact on buses which use this route. However, the volume of inbound buses which use it is small relative to the inbound buses which approach from Leeson Street Lower. The design is pragmatic in order to facilitate continued, albeit redirected, private car use and prioritise the main arterial bus routes.

9.2.1.3 Junction at Leeson Street Lower with Hatch Street and Pembroke Street Upper

The proposed junction design at Leeson Street Lower with Hatch Street and Pembroke Street Upper is entirely appropriate and generally consistent with the principles in DMURS (Vehicle Permeability, Bus Services, Junction Design).

It is noted that buses can be managed successfully thought the inbound signal controlled priority. A number of turn-bans and restriction will also be implemented in order to facilitate the bus gate on St Stephen's Green East/Leeson Street Lower and direct cars to Hatch Street. This is acceptable.

9.2.1.4 Junction at Lower Leeson Street with Adelaide Road

The inbound slip-lane to Adelaide Road has been retained. This is not consistent with the principles in DMURS (Vehicle Permeability). For safety and based on the design approach to the scheme generally, it should be removed. This would also result in an improved public realm area, which is currently marooned. It would also facilitate increased bus priority. It is noted however, that this site is due to be subject to a separate urban realm regeneration project by DCC. The ultimate solution for this space falls outside the design scope of BusConnects. Therefore, I am satisfied that the NTA's approach is acceptable. However, should the Board remain concerned about the retention of the inbound slip lane, in the interest of safety, a condition could be attached to the granting of any planning permission that it simply be closed and the Fitzwilliam Place junction be modified to allow for inbound left turns. The Board should consider this fully prior to any decision given it may have implications on the overall movement and design of the proposed scheme.

9.2.1.5 Junctions at and near the Grand Canal

The proposed arrangement at a succession of junctions between Fitzwilliam Place and Mespil Road is entirely appropriate and generally consistent with the principles in DMURS (Junction Design, Bus Services).

It is noted that between Fitzwilliam Place and Mespil Road, the bus priority is lost and becomes fragmented for a short section. While this will inevitably delay buses at peak times, it is only for approximately 120 m and can be managed successfully thought the signal controlled priority. It is appreciated that this section is constrained by the existing canal bridge and is a high volume pedestrian/cycling area. I am also satisfied that cycle infrastructure will integrate with the existing Grand Canal Cycle Route. No structural works are proposed to the canal bridge or canal itself.

9.2.1.6 Traffic Arrangement at Leeson Street Upper and Sussex Street

The one-way system on Sussex Road and the adjacent section of Leeson Street Upper have been retained. While this is not entirely appropriate and consistent with the principles in DMURS (Vehicle Permeability), its conversion to two-way system is not considered beneficial given the nature of the existing road layout and the requirement to promote sustainable forms of transport.

There is limited space to allow for dedicated lanes for all modes of transport in all directions. The reduced number of general traffic lanes in each direction to allow for full bus and cycle lane provision is appropriate. It is also noted, were the one-way system to be removed, that a number of residential properties along these roads would have limited access to parking and become marooned. It is noted that there a relocation proposed to the taxi rank shelter at the hotel, the loading bay at M O'Brien's Bar and the bus stops near the Waterloo Road junction – these are acceptable and of a minor nature.

9.2.1.7 Junction at Leeson Street Upper with Waterloo Road and Wellington Place

The proposed slip lane removal at Wellington Place is entirely appropriate and generally consistent with the principles in DMURS (Junction Design).

They generally provide little extra effective vehicular capacity but are highly disruptive for pedestrians and cyclists. It is noted that this design is justified on the basis of creating bus priority and cycle safety.

The proposed scheme introduced ‘jug turns’ along this section to facilitate bikes turning right. It is noted that it result in the mixing of pedestrians and cyclists in toucan crossings. While it may be preferable to not mix at these locations they are generally used at junctions with lesser footfall and are acceptable.

It is noted that a twos staged crossing is provided on the north side of the Waterloo Road junction. This is also not consistent with DMURS which seeks to allow pedestrians to cross the street in a single, direct movement. The applicant has justified this design decision on the basis of low pedestrian usage, higher traffic volumes, complex multi-junction arrangement (Wellington Place, Waterloo Road and Appian Way) and the requirement to maintain bus priority. This is acceptable in this instance.

It is noted that that applicant has not maintained pedestrian priority at junctions with Swan Place and Leeson Village. Should the Board remain concerned about pedestrian priority at these junctions, in the interest of safety, a condition could be attached to the granting of any permission that a vertical or horizontal deflection be included in the detailed design. The Board should consider this fully prior to any decision given it may have implications on the overall movement and design of the proposed scheme.

9.2.1.8 Arrangement at 2-78 Morehampton Road

The proposed urban realm and removal of parallel parking at 2-78 Morehampton Road is entirely appropriate and generally consistent with the principles in DMURS (On-Street Parking and Loading).

Firstly, the design has to promote sustainable forms of transport which it has done with the introduction of a dedicated cycle lane and bus priority. By limiting on-street car parking, the number of potential vehicular traffic conflicts/stoppages is reduced and safety improved. It has ensured minimal conflict with the cycle lane and bus priority. It has to be acknowledged that providing on-street parking at location is challenging given the widths and existing mature trees. The loss of car parking spaces on either side of the street is acknowledged and it is foreseeable that the lack of on-street parking can lead to poor parking behaviour from drivers who kerb mount and park on footpaths/cycle lanes. However, it is accepted that there is considerable existing off street parking in the vicinity of this location and limited commercial premises to offset such a concern. The loss of trees to facilitate the proposed design

is acceptable having regard to the long term benefits of the scheme and compensatory planting proposed.

9.2.1.9 Arrangement at 75-105 Morehampton Road

The proposed urban realm and removal of parallel parking at 75-105 Morehampton Road is entirely appropriate and generally consistent with the principles in DMURS (On-Street Parking and Loading).

Firstly, the design has to promote sustainable forms of transport which it has done with the introduction of a dedicated cycle lane and bus priority. By limiting on-street car parking, the number of potential vehicular traffic conflicts/stoppages is reduced and safety improved. It has ensured minimal conflict with the cycle lane and bus priority. It has to be acknowledged that providing on-street parking at location is challenging given the narrow widths and existing mature trees. The loss of approximately 20 car parking spaces on either side of the street is acknowledged and it is foreseeable that the lack of on-street parking can lead to poor parking behaviour from drivers who kerb mount and park on footpaths/cycle lanes and additional pressure for parking on adjoining streets. However, there is considerable on street parking in the vicinity of this location (e.g. Brendan Road, Mount Eden Road, Marlborough Road and Herbert Park Road) to offset such a concern. The relocated disabled parking bay is considered acceptable and in a safer location to enter/exit a vehicle. There are two Time Plated Loading Bays proposed also which are acceptable. I note the concern about displacement of car parking onto adjoining roads but in practice the loss of spaces at this location is considered moderate overall and generally acceptable. The loss of two mature trees to facilitate the proposed design is acceptable having regard to the long term benefits of the scheme and compensatory planting proposed.

9.2.1.10 Junction at Morehampton Road with Auburn Avenue

The proposed right turn ban at Auburn Avenue is entirely appropriate and generally consistent with the principles in DMURS (Signage and Line Marking).

Its implementation is not considered significant and vehicular users would be slightly inconvenienced in having to use the signalised junction at Victoria Avenue instead. By limiting this junction, the number of potential vehicular traffic conflicts/stoppages is reduced and safety improved.

9.2.1.11 Arrangement at 2-12 Donnybrook Road

The proposed urban realm and parallel parking at 2-12 Donnybrook Road is entirely appropriate and generally consistent with the principles in DMURS (On-Street Parking and Loading).

Firstly, the design has to promote sustainable forms of transport which it has done with the introduction of a dedicated cycle lane and bus priority. The northbound bus lane from Mulberry Lane to Rampart Lane has been removed to accommodate two narrower segregated cycle tracks, while the southbound bus lane remains. Northbound bus priority will be provided at the Eglinton Terrace junction on Donnybrook Road. It has to be acknowledged that this is challenging at this location given the pinch point outbound at the former Kiely's Public House. While several observers point to the fact that the Kiely's Public House site should have been set back in plans to redevelop it – this is a moot point now given the site has since been redeveloped in line with its planning permission.

While the loss of approximately 17 car parking spaces is acknowledged, the design has maintained a level of car parking that is directly accessible from the main vehicular carriageway. It has also ensured minimal conflict with the cycle lane and bus priority. DMURS is clear that on arterial streets on-street parking spaces should be provided in a series of bays that are parallel to the vehicular carriageway. Perpendicular or angled spaces may be provided in lower speed environments. While observers, including Mola Architecture who operate their businesses from No. 2, point to the fact that angled parking is being provided on the opposite side of the street, DMURS is clear that should generally be restricted to one side of the street to encourage a greater sense of enclosure and ensure that parking does not dominate the streetscape. It should be noted that the angled parking on the opposite side of the street is not a good design example either and simply formalises an existing arrangement. While it may be a concern that the lack of on-street parking can lead to poor parking behaviour from drivers who kerb mount and park on footpaths/cycle lanes. It is accepted that there is considerable on street parking in the vicinity of this location and in proximity to Mola Architecture (e.g. Mulberry Lane) to offset such a concern about the loss of parking.

It is accepted that the design of the public realm area is at present, basic. But I am satisfied, given its limited space, that it will be an attractive space in a highly traffic

area even under the current proposed scheme which includes street trees, seating and cycle parking. While the owner/occupiers at No.2 Donnybrook Road is of the view that cycle parking, which is indicated on its land, does not justify the land take. Taking a more holistic view, the inclusion of the space, which is required to provide public transport, is entirely justified and will serve more than just cycle parking.

I am satisfied that the proposed public realm is reasonably required for the proposed scheme in order to enhance safety of all road users and provide for a coherent cycling and pedestrian environment. If omitted, as requested by the owner/occupiers of lands at No. 2 Donnybrook Road, car parking would be maintained at this location and result in a traffic hazard for pedestrians and cyclists and be detrimental to the community need.

9.2.1.12 Arrangement opposite Donnybrook Stadium

The proposed widening of the inbound carriage way opposite Donnybrook Stadium is entirely appropriate and generally consistent with the principles in DMURS (Bus Service, Footways, Verges and Strips, Cycle Facilities).

The design has to promote sustainable forms of transport which it has done with the introduction of a dedicated cycle lane and bus priority. It is noted that access and egress to commercial properties, many of which are related to servicing of private vehicles, will be maintained. These commercial properties will have a smaller operational area as a result of the widening, and while disruptive, it is not considered detrimental to the use of these spaces for such operations.

The proposed redevelopment of these sites are noted and it is considered that both the proposed scheme and redevelopment of this site can work harmoniously. The location of bus shelters is noted but given the limited footpath width and the frequency of buses at this location, it is considered acceptable.

It is also noted that there is historic kerbing (CBC0013BTH117) at this location. I am satisfied that it can be managed successfully in line with Appendix A16.3 Methodology for Works Affecting Sensitive Historic Fabric. The loss of a mature tree outside FastFit to facilitate the proposed design is acceptable having regard to the long term benefits of the scheme and compensatory planting proposed.

9.2.1.13 Junctions at Donnybrook Road with Eglington Road, Anglesea Road, Beaver Row

The proposed arrangement at a succession of junctions between Donnybrook Stadium and Donnybrook Church is entirely appropriate and generally consistent with the principles in DMURS (Junction Design).

It is noted that bus priority and cycle lanes are maintained throughout, while traffic lanes will be filtered further south on the Stillorgan Road – this will promote sustainable forms of transport.

The removal of the inbound bus stop at Donnybrook Garage is noted and will result in the requirement for bus users to go to the bus stop at the Donnybrook Partnership site. Its removal, while inconvenient, is not considered unreasonable given the short distances to other bus stops and the improvement in pedestrian crossing facilities at all junctions on this stretch. The break in the median to facilitate access to Donnybrook Church is retained. The existing right turn ban relates to outbound traffic and should remain for safety reasons.

It is noted that a two staged crossing is provided on the north side of the Anglesea Road junction. This is not consistent with DMURS which seeks to allow pedestrians to cross the street in a single, direct movement. The applicant has justified this design decision on the basis of low pedestrian usage, higher traffic volumes, complex multi-junction arrangement (Eglington Road, Anglesea Road and Beaver Row) and the requirement to maintain bus priority. This is acceptable in this instance.

The omission of left turn slips at this junction are noted and as outlined in DMURS, they generally provide little extra effective vehicular capacity but are highly disruptive for pedestrians and cyclists is the correct approach.

It is also noted that the proposed scheme interacts with the Dodder Cycle Route at this location and I am satisfied that the designs of both can be successfully integrated.

9.2.2 Section 2 Anglesea Road Junction to Loughlinstown Roundabout

9.2.2.1 Junction at Stillorgan Road with Donnybrook Castle

The proposed raised table at this Donnybrook Castle is entirely appropriate and generally consistent with the principles in DMURS (Horizontal and Vertical Deflections).

It will encourage drivers to slow down when approaching this area. Thus, improving safety and enhancing accessibility and connectivity for vulnerable road users. While the concerns of observers are noted, such measures are in the interest of safety for the most vulnerable road users and will be of minor inconvenience to drivers. Such measures have been successfully implemented on several locations and are effective. The submission is also concerned with visibility splays from the location of the stop line/sign. The Stage 1 Road Safety Audit for the Proposed Scheme is provided as Appendix M2 of the Preliminary Design Report included as part of the Supplementary Information does not identify any problems or concerns associated with visibility at this junction. I am satisfied that the stop sign/line is located appropriately to calm vehicular traffic prior to entering the raised table and allow vehicles to proceed at caution onto the carriageway.

9.2.2.2 Junction at Stillorgan Road with Airfield Park and Raidió Teilifís Éireann

The proposed arrangement of the junction at Stillorgan Road with Airfield Park and Raidió Teilifís Éireann is entirely appropriate and generally consistent with the principles in DMURS (Junction Design).

It is noted that bus priority and cycle lanes are maintained but improved throughout, while traffic lanes are largely left as existing. Existing traffic management measures including U-turn bans and the enforcement of same are wider driver behaviour issues and would be subject to general rules of the road and policing by An Garda Siochana. It is noted that the cycle lane on Airfield Park is a tie-in to the existing carriageway and while it is a cul-de-sac, there is no reason why this road should not have such a cycle facility. It is noted that in Appendix B10 - Junction Systems Design that signalised toucan crossing is provided on the northern side of the junction for pedestrians.

9.2.2.3 Junction at Stillorgan Road with Nutley Lane and Greenfield Park

The proposed arrangement of the junction at Stillorgan Road with Nutley Lane and Greenfield Park is entirely appropriate and generally consistent with the principles in DMURS (Junction Design).

It is noted that the owner/occupier of 118 Stillorgan Road, which is a property on the south east corner of this junction, has raised concern about the closure of an entrance to the property. The property currently has three access points to the public roadway - two vehicular, one pedestrian. If closed, the owner/occupier will still have

vehicular access to Nutley Lane. While the observer points out that other Stillorgan Road properties access point are maintained, it must be noted that these properties largely have only one entrance as it is and are not located on the junction. Overall, on balance, I consider that the benefit in terms of increased traffic safety for cyclists, pedestrians and all vehicles using the Stillorgan Road junction outweighs the potential inconvenience that will arise for the occupants.

There is an interaction at this junction with the Interaction with the Blackrock to City Centre Core Bus Corridor Scheme. Works proposed to this junction are consistent across both schemes. Nutley Lane is an interconnecting road between both schemes. These works, on both Nutley Lane and the Blackrock Scheme generally have been considered in terms of cumulative impacts within the EIAR assessment hereunder and have been found not to be significant.

9.2.2.4 Bus Interchange at University College Dublin

The proposed bus interchange at University College Dublin (UCD) have been developed in collaboration with UCD and align with the UCD Future Campus masterplan. The interchange is situated near the Belfield flyover on the R138 Stillorgan Road and features two main operation zones: a main interchange plaza for high-frequency bus routes and bus islands for lower-frequency and regional routes, located near the UCD veterinary building. UCD is primarily reliant on bus services due to the distance from both DART and Luas services.

The proposed scheme includes the upgrade of shared pedestrian and cycle paths through the existing woodland at this location. There will be a total of 20 bus stops installed along with bus shelters and associated seating. There will be additional paving and crossings of the carriageways also to enhance the pedestrian experience.

The proposed development is consistent with the wider developments at the UCD campus and indeed the masterplan.

The development of the interchange will result in the the removal of a significant number of trees to facilitate it along with new carriageways. It is also noted that the design includes a bespoke canopy shelters for pedestrians which gives the area prominence as a transport hub. In order to compensate for tree removal, there will be new planting provided. This arrangement is illustrated in Drawing BLD_ZZ 13 IN_00 DR AA 0001 and BLD_ZZ 13 IN_00 DR AA 0002.

The proposed arrangement of the UCD Bus Interchange is entirely appropriate and well planned to create a unified urban environment under the masterplan. The loss of a mature trees to facilitate the proposed design is acceptable having regard to the long term benefits of the scheme and compensatory planting proposed.

9.2.2.5 Construction Compound at Fosterbrook

The location of the construction compound on a green space of Fosterbrook is acceptable. It is currently amenity grassland and habitually open. It will be a temporary installation for the construction phase and removed on completion. It has limited interaction, visual or otherwise, with St Helen's Hotel.

9.2.2.6 Entrance at Stillorgan Road with Coláiste Eoin

The proposed arrangement for the entrance at Stillorgan Road with Coláiste Eoin is entirely appropriate and generally consistent with the principles in DMURS (Horizontal and Vertical Deflections).

It will result in the loss of trees to the north of the entrance to facilitate a tie-in to a cycle track. This is required to facilitate access to the junction with Merrion Grove. While note the most straightforward design, its requirement in terms of safety is acknowledged and its arrangement generally acceptable. The loss of a mature trees to facilitate the proposed design is acceptable having regard to the long term benefits of the scheme and compensatory planting proposed. I note the submission of the school management and I am satisfied that issues in respect of the operation of the school including access, safety and use of the recreational spaces can be managed through the CEMP.

9.2.2.7 Junction at Stillorgan Road with Booterstown Avenue and Roebuck Avenue

The proposed arrangement of the junction at Stillorgan Road with Booterstown Avenue and Roebuck Avenue is entirely appropriate and generally consistent with the principles in DMURS (Junction Design).

The omission of left turn slips, which generally provide little extra effective vehicular capacity but are highly disruptive for pedestrians and cyclists is the correct approach. Their removal is also required to cater for the bus priority.

9.2.2.8 Junction at Stillorgan Road with Mount Merrion Avenue and Sycamore Cresent

The proposed arrangement of the junction at Stillorgan Road with Mount Merrion Avenue and Sycamore Cresent is entirely appropriate and generally consistent with the principles in DMURS (Junction Design).

The omission of left turn slips, which generally provide little extra effective vehicular capacity but are highly disruptive for pedestrians and cyclists is the correct approach. Their removal is also required to cater for the bus priority.

It is noted that Mount Merrion Avenue is also a National Primary Route (N31). The N31 connects the harbour at Dún Laoghaire to the N11/M11 and M50. It is not considered that the design of the junction will have any material impact on the operation of the N31.

9.2.2.9 Junction at Stillorgan Road with Treesdale and Trees Road Lower

The proposed arrangement of the junction at Stillorgan Road with Treesdale and Trees Road Lower is entirely appropriate and generally consistent with the principles in DMURS (Junction Design).

The omission of left turn slips, which generally provide little extra effective vehicular capacity but are highly disruptive for pedestrians and cyclists is the correct approach. Their removal is also required to cater for the bus priority. It is noted that utility boxes at James Hennesy Motors require movement to facilitate the proposed scheme, which is entirely acceptable.

9.2.2.10 Pedestrian Arrangements at Stillorgan Road and Patrician Villas

At Patrician Villas it is proposed to install a new pedestrian footpath and stairs/ramp to the connect the estate to the N11 and relocated bus stops. It is also proposed to widen the N11 underpass which connects the estate to St Laurence's. The estate is at a level below the road.

The observers to the file are of the view that the proposed development at this location is unnecessary and they are already having sufficient access to the bus stops on the N11. There is also the view that the proposed development will create new access to the estate and result in antisocial behaviours. The residents of the area have suggested other alternative options including improving the existing ramp

on the Stillorgan side of the N11 in order to avoid the additional works. The issue of maintenance is also raised given the poor lighting on the underpass currently.

The design for Patrician Villas is intended to improve mobility and the people of movement according to the applicant. The links being proposed to public transport will become increasingly important as demand increases for an improved public transport service. The applicant also highlights their document titled "Permeability in Existing Urban Areas Best Practice Guide 2015". This is detailed in Table 2.9, Section 2.3.5.1 of Chapter 2 (Need for the Proposed Scheme) of the EIAR. The document has informed the design of the proposed scheme and is focused on facilitating permeability and direct links to the public transport and indeed wider amenities in the area including shopping centres, schools and work places.

The proposed toucan crossing on the N11 will facilitate pedestrian access to the bus stop on the N11. The NTA are of the view that this is required to facilitate the efficient movement of pedestrians and enable them to access the public transport network. The NTA are satisfied that it aligns with the movement plan which is part of the Stillorgan LAP that was prepared by DLRCC. It will also provide improved links for other developments in the area such as those scheme proposed at St Laurence's Park and Stillorgan Leisureplex. It also provides increased accessibility for impaired and vulnerable users.

The improvements to the underpass are detailed in the Preliminary Design Report submitted a supplementary information. It is noted that the proposed scheme includes additional lighting and painting of the underpass. It is noted that the design has been informed by existing utilities at this location. I consider this report reasonable.

The overall design I considered the design best practice and is appropriate in this instance. It will significantly shorten walking times for local residents and visitors to Stillorgan who intend to access it by public transport. The Board should also bear in mind that short and direct links to public transport is critical for accessibility of those with a disabilities or reduced mobility.

I am satisfied based on the conclusion of the EIAR, that impacts in terms of air quality, noise and vibration, human health and loss of trees is acceptable. The loss of a mature trees to facilitate the proposed design is acceptable having regard to the long term benefits of the scheme and compensatory planting proposed.

I am also satisfied that the proposed development is being carried out in accordance with the Stillorgan LAP, as extended. The movement framework plan within this had identified the relocation of the sound bound bus stop and align it with the northbound stop. The LAP also identified the provision of an at-grade pedestrian crossing. This provides an alternative to using the underpass.

On this basis, it is considered the proposed arrangement at Patrician is entirely appropriate and generally consistent with the principles in DMURS (Retrofitting). The proposed scheme will ensure the link is short, overlooked, have clear sight lines and can be well lit to mitigate anti-social behaviour.

9.2.2.11 Junction at Stillorgan Road with Stillorgan Park Road and Lower Kilmacud Road

The proposed arrangement of the junction at Stillorgan Road with Stillorgan Park Road and Lower Kilmacud Road is entirely appropriate and generally consistent with the principles in DMURS (Junction Design).

The omission of left turn slips, which generally provide little extra effective vehicular capacity but are highly disruptive for pedestrians and cyclists is the correct approach. Their removal is also required to cater for the bus priority. I am also satisfied the proposed development generally accords with the Stillorgan - Local Area Plan 2018 – 2024 as extended which has a movement framework plan to remove of slip lanes onto Upper Kilmacud Road to minimise cyclist / vehicular conflict.

9.2.2.12 Junction at Stillorgan Road (Inbound) with the Hill

The proposed arrangement of the junction at Stillorgan Road with the Hill is entirely appropriate and generally consistent with the principles in DMURS (Junction Design).

The omission of left turn slips, which generally provide little extra effective vehicular capacity but are highly disruptive for pedestrians and cyclists is the correct approach. Their removal is also required to cater for the bus priority.

It is noted that the removal of the slip lane relates to vehicular traffic only and pedestrians can continue to permeate through. The permeation of cyclists is not facilitated by the proposed scheme. It is unclear why this was not facilitated by design given would be clear desire line for those wishing to access Stillorgan Village. The Cyle Design Manual 2023 advocates strongly for directness as an indirect designated route, as in this case to the junction with Lower Kilmacud Road, involves

extra distance will result in some cyclists choosing the most direct, faster option. Should the Board remain concerned about cycle links at this location, in the interest of orderly development, a condition could be attached to the granting of any permission that an inbound cycle lane link to the Hill be included in the detailed design. The Board should consider this fully prior to any decision given it may have implications on the overall movement and design of the proposed scheme.

9.2.2.13 Entrance at Stillorgan Road and the Grange

The proposed arrangement for the entrance at Stillorgan Road and the Grange is appropriate and generally consistent with the principles in DMURS. It is currently proposed that cycle track at the two existing access and egress points will be at grade with the road level and demarcated by road marking. However, it would certainly benefit from Horizontal and Vertical Deflections in the form of a raised table for pedestrians to ensure priority is maintained and other mechanism to narrow the entrances. It is unclear why the design did not include this treatment which is proposed at similar entrances in the scheme – particularly given the entrance widths at these locations.

It is noted that that applicant has not maintained pedestrian priority at the Grange. Should the Board remain concerned about pedestrian priority at this location, in the interest of safety, a condition could be attached to the granting of any permission that a vertical or horizontal deflection be included in the detailed design. The Board should consider this fully prior to any decision given it may have implications on the overall movement and design of the proposed scheme.

9.2.2.14 Cycle Lane Arrangement at Galloping Green

Outbound at Galloping Green, the cycle lane stays left of the main carriageway at the side road, rejoining it south of Belmont House Nursing Home. An observation queries whether the cycle lane should simply continue with the alignment of the main carriageway. The applicant has justified the design on the basis of safety for cyclists, bus stop and maintaining parking at this location. It is appreciated that given the speed at which private vehicles may leave the main carriageway and entre the side road would be unsafe for cyclists. Were the cycle route to continue along the main alignment it would also result in the loss of the green verge. it would certainly benefit from Horizontal and Vertical Deflections in the form of a raised table for pedestrians

to ensure priority is maintained and other mechanism to narrow the entrances. It is unclear why the design did not include this treatment which is proposed at similar entrances in the scheme – particularly given the entrance widths at these locations. Should the Board remain concerned about pedestrian priority at these junctions, in the interest of safety, a condition could be attached to the granting of any permission that a vertical or horizontal deflection be included in the detailed design. The Board should consider this fully prior to any decision given it may have implications on the overall movement and design of the proposed scheme.

9.2.2.15 Junction at Stillorgan Road with Leopardstown Road and Newtownpark Avenue

The proposed arrangement of the junction at Stillorgan Road with Leopardstown Road and Newtownpark Avenue is appropriate and generally consistent with the principles in DMURS (Junction Design).

The retention of left turn slips is noted and while they generally provide little extra effective vehicular capacity and can be highly disruptive for pedestrians, cyclists and bus priority. The design is justified based on the left turning traffic numbers. It is noted that cyclists will not have interact with the slip lane or be forced to cross it in order to continue through the junction.

The proposed schemes at the St Joseph's House and Abeline House sites are noted, however, I am satisfied that the proposed design, with priority to sustainable modes, is the best approach to addressing congestion. The do-nothing scenario and retention of slip lanes would simply result in additional congestion, which observers such as Mr Peet and others alludes to. I am satisfied that the EIAR has fully considered the traffic and transport implications at this junction and meets the objectives of the proposed scheme.

9.2.2.16 Junction at Stillorgan Road with Kill Lane

The proposed arrangement of the junction at Stillorgan Road with Kill Lane is entirely appropriate and generally consistent with the principles in DMURS (Junction Design).

The omission of left turn slips, which generally provide little extra effective vehicular capacity but are highly disruptive for pedestrians and cyclists, is the correct approach.

9.2.2.17 Pedestrian Arrangements at Stillorgan Road and South Park

There is a several submissions related to pedestrian arrangements at South Park (a cul-de-sac), many from residents of the area and notably the owner/occupiers of 114 and 115 and 116 South Park which are the dwellings at the end of the cul-de-sac. Those observers object to the design intervention at this location which includes a new pedestrian footpath connecting the N11 to South Park. A bus stop is located immediately west of the cul-de-sac and is being retained. Observers are of the view that the proposed pedestrian link is generally unnecessary.

The design for South Park is intended to improve mobility and the people of movement according to the applicant. The links being proposed to public transport will become increasingly important as demand increases for an improved public transport service. The applicant also highlights their document titled "Permeability in Existing Urban Areas Best Practice Guide 2015". This is detailed in Table 2.9, Section 2.3.5.1 of Chapter 2 (Need for the Proposed Scheme) of the EIAR. The document has informed the design of the proposed scheme and is focused on facilitating permeability and direct links to the public transport and indeed wider amenities in the area including shopping centres, schools and work places.

The permeability measure at South Park will facilitate pedestrian access to the bus stops on the N11. The NTA are of the view that this is required to facilitate the efficient movement of pedestrians and enable them to access the public transport network.

It will also provide improved links for other commercial premises and residential in Cornelscourt, which is located on the western side of the N11. It also provides increased accessibility for impaired and vulnerable users.

The Board should also bear in mind that short and direct links to public transport is critical for accessibility of those with a disabilities or reduced mobility.

I am satisfied based on the conclusion of the EIAR, that impacts in terms of air quality, noise and vibration, human health is acceptable. The loss of a trees to facilitate the proposed design is acceptable having regard to the long term benefits of the scheme and compensatory planting proposed.

On this basis, it is considered the proposed arrangement at South Park is entirely appropriate and generally consistent with the principles in DMURS (Retrofitting). The

proposed scheme will ensure the link is short, overlooked, have clear sight lines and can be well lit to mitigate anti-social behaviour.

9.2.2.18 Junction at Stillorgan Road with Clonkeen Road

The proposed arrangement of the junction at Stillorgan Road with Clonkeen Road is entirely appropriate and generally consistent with the principles in DMURS (Junction Design).

The omission of left turn slips, which generally provide little extra effective vehicular capacity but are highly disruptive for pedestrians and cyclists is the correct approach.

9.2.2.19 Junction at Bray Road with Johnstown Road

The proposed arrangement of the junction at Bray Road with Johnstown Road is entirely appropriate and generally consistent with the principles in DMURS (Junction Design).

The omission of left turn slips, which generally provide little extra effective vehicular capacity but are highly disruptive for pedestrians and cyclists is the correct approach.

9.2.2.20 Pedestrian Arrangements at Bray Road and Shanganagh Vale

There is a significant volume of submissions related to pedestrian arrangements at Shanganagh, many from residents of the area. Those observers object to the design intervention at this location which includes a new pedestrian footpath connecting the N11 to the southern end of Shanganagh Vale (opposite No 34 Shanganagh Vale). A bus stop is located immediately south and is being retained. Observers believe proposed pedestrian link is unnecessary.

The design for Shanganagh Vale is intended to improve mobility and the people of movement according to the applicant. The links being proposed to public transport will become increasingly important as demand increases for an improved public transport service. The applicant also highlights their document titled "Permeability in Existing Urban Areas Best Practice Guide 2015". This is detailed in Table 2.9, Section 2.3.5.1 of Chapter 2 (Need for the Proposed Scheme) of the EIAR. The document has informed the design of the proposed scheme and is focused on facilitating permeability and direct links to the public transport and indeed wider amenities in the area including shopping centres, schools and work places.

The link for Shanganagh Vale is considered best practice, as the new link and associated bus stop, along with the signalised crossing at N11 Road, will significantly

shorten the walk for residents to the N11's western side for inbound buses. The Board should also bear in mind that short and direct links to public transport is critical for accessibility of those with disabilities or reduced mobility.

I am satisfied based on the conclusion of the EIAR, that impacts in terms of air quality, noise and vibration and human health is acceptable.

On this basis, it is considered the proposed arrangement at Shanganagh Vale is entirely appropriate and generally consistent with the principles in DMURS (Retrofitting). The proposed scheme will ensure the link is short, overlooked and have clear sight lines and will provide a significantly improved arrangement for bus users and pedestrians at this location.

9.2.2.21 Junction at Bray Road with Willow Avenue

The proposed raised table at Bray Road and Willow Avenue is entirely appropriate and generally consistent with the principles in DMURS (Horizontal and Vertical Deflections).

It will encourage drivers to slow down when approaching this area. Thus, improving safety and enhancing accessibility and connectivity for vulnerable road users. While the concerns of observers are noted, such measures are in the interest of safety for the most vulnerable road users and will be of minor inconvenience to drivers. Such measures have been successfully implemented on several locations and are effective. The submission is also concerned with visibility splays from the location of the stop line/sign. The Stage 1 Road Safety Audit for the Proposed Scheme is provided as Appendix M2 of the Preliminary Design Report included as part of the Supplementary Information does not identify any problems or concerns associated with visibility at this junction. I am satisfied that the stop sign/line is located appropriately to calm vehicular traffic prior to entering the raised table and allow vehicles to proceed at caution onto the carriageway.

9.2.2.22 Junction and Flyover at Bray Road with Wyattville Road

The proposed arrangement of the junction and Flyover at Bray Road with Wyattville Road is appropriate and generally consistent with the principles in DMURS (Junction Design). However, I am of the view that the proposed scheme does not entirely meet the principles of the Cyle Design Manual 2023.

While general vehicular arrangements at this junction remain largely unchanged, this is a complex junction for pedestrians and cyclists as a result of:

- the existing flyover design which is orientated toward vehicular traffic and includes a spiral ramp on the western side (this is excluded from the scheme):
- the width of corridor at this location which includes up to 9 traffic lanes in parts can be difficult to read and illegible for pedestrians and cyclists,
- the interactions with the M11 and M50 Motorways which can be accessed from the R118 at Cherrywood and N11 at Loughlinstown Roundabout

For outbound cyclists, the route is straightforward and they will eventually meet the bi-directional cycle lane on the outbound side of the corridor between Wyattville Road and Loughlinstown Roundabout.

For inbound cyclists, the maintenance of the bi-directional cycle lane is appropriate given the majority of cycle traffic is coming from the Shankill and Bray area. However, once inbound cyclists reach the flyover, the principle of coherence, directness and attractiveness are lost.

At a network level, cycle routes should be connected and easy to navigate. Cycle routes should not have gaps or be interrupted at difficult locations. For inbound cyclists, there would be up to 6 interruptions in the length of approximately 600 m were a cyclist has to use the toucan crossing at Cherrywood Road. Were an inbound cyclist to use the flyover, there would be 4 interruptions over that same length as set out in the figures for the Junction Systems Design and Traffic Signs and Road Markings. Any weak links in the network will reduce the overall level of service, could deter new or less confident users to cycle and render a whole journey inaccessible for some people. In addition, indirect designated routes involving more stopping and starting will result in some cyclists choosing the most direct, faster option, even if it is less safe. In this instance, would likely mean use of bus lanes.

I note the submission of DLRCC and information provided about the proposed Cherrywood to Rathmichael Manor Rapid Build Cycle Scheme There is an overlap between both schemes and they share similar objectives and effectively complement one and other. However, it does not assist inbound cyclists from Shankill.

In conclusion, it is accepted that this a challenging intersection and flyover to retrofit cycle infrastructure into. While the proposed scheme is not the most direct or fastest, its design is safe and meets the objectives of the scheme. It is also noted that the

applicant has proposed relevant directional signage in its scheme for traffic signs and road markings.

9.2.2.23 Junction of Bray Road with M11 Merge/Diverge (Loughlinstown Roundabout)

It is noted that the arrangement at Loughlinstown Roundabout will largely remain as it currently exists. The retention of roundabouts in urban areas is not generally consistent with DMURS. They require a greater land take and are difficult for pedestrians and cyclists to navigate, particularly where controlled crossings/cycle facilities are not provided, and as such, vehicles have continuous right of way.

However, in this instance, I am satisfied that there is a lower level of pedestrian activity at this location largely due to the commencement of the M11. The applicant has provided a design that serves pedestrians and cyclists on the eastern side of the roundabout. A pedestrian bridge is located to the north of the roundabout and provides a pedestrian link to the St Columcille's Hospital and Rathmichael Manor. Were the motorway not present at this location, a signalised junction may have been preferable but I accept the approach in this instance.

9.2.3 Section 3 Loughlinstown Roundabout to Bray North (Wilford Roundabout);

9.2.3.1 Access(s) between Loughlinstown Roundabout and the National Ambulance Centre

The proposed arrangement for the access points between Loughlinstown Roundabout and the National Ambulance Centre at Dublin Road with National Ambulance Service (Loughlinstown) are generally appropriate and consistent with the principles in DMURS (Horizontal and Vertical Deflections).

It is noted that St Rita's (RPS 1786) is a protected structure but its boundary will not be interfered with.

It is currently proposed that pedestrian path at the existing access and egress point to the National Ambulance Centre will be at grade with the road level and demarcated by road marking. While it is acknowledged that emergency vehicles use this access, it would benefit from Horizontal and Vertical Deflections in the form of paving, even if it at the same grade as the road, to ensure pedestrians are afforded some level of safety and comfort from non-emergency vehicles using this entrance. It

is unclear why the design did not include this treatment which is proposed at similar entrances in the scheme – particularly given the entrance widths at these locations Should the Board remain concerned about pedestrian priority at these junctions, in the interest of safety, a condition could be attached to the granting of any permission that a vertical or horizontal deflection be included in the detailed design. The Board should consider this fully prior to any decision given it may have implications on the overall movement and design of the proposed scheme.

9.2.3.2 Junction at Dublin Road with Seaview Park

The proposed raised table at this Donnybrook Castle is entirely appropriate and generally consistent with the principles in DMURS (Horizontal and Vertical Deflections).

It will encourage drivers to slow down when approaching this area. Thus, improving safety and enhancing accessibility and connectivity for vulnerable road users. While the concerns of observers are noted, such measures are in the interest of safety for the most vulnerable road users and will be of minor inconvenience to drivers. Such measures have been successfully implemented on several locations and are effective. The submission is also concerned with visibility splays from the location of the stop line/sign. The Stage 1 Road Safety Audit for the Proposed Scheme is provided as Appendix M2 of the Preliminary Design Report included as part of the Supplementary Information does not identify any problems or concerns associated with visibility at this junction.

9.2.3.3 Junction at Dublin Road with Rathmichael Woods

The proposed raised table at Dublin Road with Rathmichael Woods is entirely appropriate and generally consistent with the principles in DMURS (Horizontal and Vertical Deflections).

It will encourage drivers to slow down when approaching this area. Thus, improving safety and enhancing accessibility and connectivity for vulnerable road users. While the concerns of observers are noted, such measures are in the interest of safety for the most vulnerable road users and will be of minor inconvenience to drivers.

Such measures have been successfully implemented on several locations and are effective. The submission is also concerned with visibility splays from the location of the stop line/sign. The Stage 1 Road Safety Audit for the Proposed Scheme is

provided as Appendix M2 of the Preliminary Design Report included as part of the Supplementary Information does not identify any problems or concerns associated with visibility at this junction.

9.2.3.4 Arrangement between Clonmore, Dublin Road and Rathmichael National School

This section relates the land acquisition between Clonmore, Dublin Road and Rathmichael National School and on the west side of Dublin Road. It includes several detached and semi-detached properties with front gardens, the Woodbank estate and an amenity space bounding road and Rathmichael National School which includes an all-weather pitch.

It is proposed to permanently and acquire lands along these properties. It is noted that the acquisition could have indeed been much more extensive were the designers intent on providing a more optimum scheme at this location. Segregated cycling facilities have not been provided as the impacts including land take to residential properties were not considered appropriate. The proposed bus lanes along this section will be shared with cyclists a result. In certain inbound sections, no bus lane will exist. It is considered the design has balanced the need for the scheme with the impacts to adjoining residents and lessened any significance and is entirely proportionate to the scheme.

The Dublin Road is constrained spatially and in order to achieve additional space certain trees will require removal and walls/access require alteration and reinstatement. While it may not be desirable to lose certain trees, hedging and walls/piers, I am satisfied that the mitigation proposed by the applicant in terms of supplemental planting and reinstatement is sufficient. It is also not considered that the impact to children and how they play would be significant. While I note the concerns of residents of Woodbank, the amenity area adjoining the Dublin Road would generally continue to operate as it currently does.

It is accepted that during the construction phase there will routine construction related pollution and nuisance generated including traffic, air and dust, noise and vibration, light, and visual related impacts with the potential to cause nuisance and impact on the amenities of various receptors. These impacts will be temporary and short-term and would be controlled as part of the standard and best practice construction measures. During the operational phase there will again be certain

traffic, air and dust, noise and vibration, light, and visual related impacts associated with the proposed scheme. These impacts are not considered to be significant, and while undesirable, are inevitable in such an urban/suburban context and not that dissimilar to what receptors would experience presently. I am satisfied based on the conclusion of the EIAR, that impacts in terms of air quality, noise and vibration, human health is acceptable.

The loss of a trees to facilitate the proposed design occurs further north than Clonmore at the National Ambulance Service and continues to Woodbank with some vegetation loss at Rathmichael Parish School. The impacts, again in terms of air quality, noise and vibration, human health is acceptable having regard to the long term benefits of the scheme and compensatory planting proposed. I also note that that new native planting will repair the front face of the broader tree belt to the north and losses at properties will be reinstated. I am satisfied that the applicant has considered all these issues.

It is noted that a building in the Rathmichael Parish School complex is a protected structure (RPS 1799). The building has had significant alterations and extensions over the years. The removal and setting back of the eastern concrete retaining wall, will not have a material impact on the setting of the protected structure. I note the submission of the school management and I am satisfied that issues in respect of the operation of the school including access, safety and use of the recreational spaces can be managed through the CEMP.

9.2.3.5 Junction of Dublin Road with Stonebridge Road

The proposed arrangement at the of junctions of Dublin Road with Stonebridge Road is entirely appropriate and generally consistent with the principles in DMURS (Junction Design). It is noted that a Singal Controlled Priority is also being installed at this location which will prioritise buses to improve journey times. It is noted that the land take occurs on the eastern side of the carriageway from this point with the loss of certain trees and walls. I am satisfied that the applicant has considered all these issues in terms of air quality, noise and vibration, human health and is acceptable.

9.2.3.6 Two Way Cycle Lane from Stonebridge Road to St Anne's Roundabout

The proposed two-way cycle from Stonebridge Road to St Anne's Roundabout is entirely appropriate and generally consistent with the principles in the Cycle Design

Manual. This is reasonably required to provide a safe cycle link to the two schools on Stonebridge Road which is relatively narrow road.

While the concern about the land take from the recently developed Stonebridge estate is noted, overall, it is considered acceptable. There would be sufficient space for a playground facility, which itself would have increased accessibility and a safe cycle route for younger and more vulnerable road users.

It is noted that the land take occurs on the eastern side of the Dublin Road carriageway from this point with the loss of certain trees and walls. I note the concern of residents along the Dublin Road I am satisfied that the applicant that the EIA has considered all these issues in terms of air quality, noise and vibration, human health and is acceptable. Access and egress will be maintained to properties during construction. The plot north of the church contains a protected structure St Annes (RPS 1800). While the boundary will be altered at this location, this is a 1930's construction and the boundary has no material heritage value. The setting of the protected structure will not be materially altered.

9.2.3.7 Junction of Dublin Road with Shanganagh Road and Corbawn Lane.

The proposed arrangement of the junction Dublin Road with Shanganagh Road and Corbawn Lane is entirely appropriate and generally consistent with the principles in DMURS (Junction Design).

While the existing roundabout may have served vehicular traffic well at this location, there is a safety issue arising for pedestrians and cyclists who find roundabouts more difficult to navigate where there is a lack of controlled crossings/cycle facilities .

Given the spatial constraints and amount of land-take required for roundabouts, a signalised junction is more appropriate given the requirement to introduce bus priority and safe facilities for pedestrian and cyclist. Furthermore, the existing community and commercial facilities at this junction, such as on the St Annes Church and Lidl property, has led to an increase in footfall in the area.

The concern of DLRCC and other observers about the compliance with Specific Local Objective 148 which seeks to protect and safeguard the roundabouts on the approaches into Shankill village at St. Anne's Church and at the junction of Dublin Road (R119) and Quinn's Road are noted – however, such an objective has no basis in policy or guidance and is inconsistent with DMURS where there is an overriding

principle of safety of all road users, rather than just efficiency of private vehicles. The Board should note that SLO148 is an objective rather than a policy. SLO148 also directly contradicts Policy Objective PHP35 in which it is a policy to promote the guidance set out DMURS and to promote safer and more attractive streets and public realm for all road users by proactively engaging with, and adhering to, guidance set out DMURS and a range of other polices set out in Table 15: Policies and Objective of the DLRCDP.

The use of large roundabouts should be restricted to areas with lower levels of pedestrian activity. Large roundabouts are defined in DMURS as those with radii greater than 7.5m, the current roundabout has an inscribed circle diameter/radius, of approximately 30m/15m Where large roundabouts currently exist, road authorities are encouraged, as part of any major upgrade works, to replace them with signalised junctions. Otherwise, roads authority should retrofit them so that are more compact and/or pedestrian and cycle friendly, as is appropriate. However, given the multi-modal objectives for this scheme, which also requires bus priority this would not be possible.

It is noted that this signalised junction design will result in a outbound bus lane up to the junction and will be supplemented with Single Control Priority as there is no bus lane through Shankill Village. The two-way cycle lane which was described in the previous section will continue to Corbawn Lane. Corbawn Lane is to be an exit only junction on to Shanganagh Road. It is noted that there is pedestrian facility at the Shanganagh Road and Corbawn Lane junction itself, rather it is approximately 50m north. While this provides access to Lidl, the pedestrian desire line is most likely to be more direct than that and is being facilitated by an improved footpath leading to an uncontrolled junction. Should the Board remain concerned about pedestrian priority at these junctions, in the interest of safety, a condition could be attached to the granting of any permission that a vertical or horizontal deflection be included in the detailed design. The Board should consider this fully prior to any decision given it may have implications on the overall movement and design of the proposed scheme.

A dedicated right-turn lane is proposed from Shanganagh Road on to Beechfield Manor. A dedicated left turn lane from Shanganagh Road into Beechfield Manor is also to be provided. This will formalise traffic arrangements for those accessing Lidl in particular. Access to the property on Corbawn Lane is maintained. It is noted that the existing car park at St Anne's Church, which is impacted by the Proposed

Scheme, will be reconfigured to accommodate the equivalent number of parking as existing, subject to agreement with the landowner. This is acceptable

The Dublin Road is constrained spatially and in order to achieve additional space certain trees will require removal and walls/access require alteration and reinstatement. While it may not be desirable to lose certain trees, hedging and walls/piers, I am satisfied that the mitigation proposed by the applicant in terms of supplemental planting and reinstatement is sufficient. While I note the concerns of owner/occupier at St Anne's Church, the community facility would generally continue to operate as it currently does and retain sufficient parking for ceremonies and services. It is also noted that the church is a protected structure but is setting will not be materially impacted and has been significantly altered over the years in any case and largely serves as a car park.

9.2.3.8 Shankill Village between Corbawn Lane and Quinn's Road

The proposed scheme at Shankill Village is entirely appropriate and generally consistent with the principles in DMURS. The primary intervention includes horizontal and vertical deflections at side roads which will encourage drivers to slow down when approaching this area. Thus, improving safety and enhancing accessibility and connectivity for vulnerable road users.

It is noted that despite their being sufficient width in parts, from Lower Road to Stonebridge Close, to provide for at least a bus lane in one direction, the applicant has sought the minimise the impact and function of the core commercial area of Shankill. The parking arrangements generally remain as it currently exists.

It is noted that that applicant has not maintained pedestrian priority at every junction within Shankill Village. Should the Board remain concerned about pedestrian priority at these junctions, in the interest of safety, a condition could be attached to the granting of any permission that a vertical or horizontal deflection be included in the detailed design. The Board should consider this fully prior to any decision given it may have implications on the overall movement and design of the proposed scheme.

9.2.3.9 Junction of Dublin Road with Quinn's Road and Cherrington Road.

The proposed arrangement of the junction Dublin Road with Quinn's Road and Cherrington Road is entirely appropriate and generally consistent with the principles in DMURS (Junction Design).

While the existing roundabout may have served vehicular traffic well at this location, there is a safety issue arising for pedestrians and cyclists who find roundabouts more difficult to navigate where there is a lack of controlled crossings/cycle facilities . Given the spatial constraints and amount of land-take required for roundabouts, a signalised junction is more appropriate given the requirement to introduce safe facilities for pedestrian and cyclist.

The concern of DLRCC about the junction and designs ability to handle right turns is noted but is only considerate of vehicular traffic. The Specific Local Objective 148 which seeks to protect and safeguard the roundabouts on the approaches into Shankill village at St. Anne's Church and at the junction of Dublin Road (R119) and Quinn's Road are noted – however, such an objective has no basis in policy or guidance and is inconsistent with DMURS where there is an overriding principle of safety of all road users, rather than just efficiency of private vehicles. The Board should note that SLO148 is an objective rather than a policy. SLO148 also directly contradicts Policy Objective PHP35 in which it is an actual policy to promote the guidance principles set out DMURS and to promote safer and more attractive streets and public realm for all road users by proactively engaging with, and adhering to, guidance set out DMURS and a range of other polices set out in Table 15: Policies and Objective of the DLRCDP.

The use of large roundabouts should be restricted to areas with lower levels of pedestrian activity. Large roundabouts are defined in DMURS as those with radii greater than 7.5m, the current roundabout has an inscribed circle diameter/radius, of approximately 20m/10m Where large roundabouts currently exist, road authorities are encouraged, as part of any major upgrade works, to replace them with signalised junctions. Otherwise, roads authority should retrofit them so that are more compact and/or pedestrian and cycle friendly, as is appropriate. However, given the multi-modal objectives for this scheme, which also requires facilities for pedestrian and cyclist this would not be possible.

9.2.3.10 Junction at Dublin Road between Castlefarm and Olcovar

The proposed arrangement of the junction Dublin Road between Castlefarm and Olcovar is entirely appropriate and generally consistent with the principles in DMURS (Junction Design).

At Castlefarm, a raised table is proposed which is again entirely appropriate and generally consistent with the principles in DMURS (Horizontal and Vertical Deflections). It will encourage drivers to slow down when approaching this area. Thus, improving safety and enhancing accessibility and connectivity for vulnerable road users.

The applicant has sought to retain trees at this location. Therefore, the existing boundary wall and footpath are set back from the existing carriageway. This will facilitate a wider footpath on both sides of the street, where it is currently sub-standard. This will require the removal and replacement of the attractive, old granite and limestone rubble boundary wall. Part of this wall has been previously rebuilt, specifically the northern portion and gate pier but the southern part is older and relates to Kiltuc Church (RMP DU026-054001) and the old demesne wall of Shanganagh Castle (RMP DU026-120, DLR RPS 1845, 2089, NIAH 60260146, 60260148, NIAH 2556). The applicant has identified the pre-mitigation Construction Phase impact as Direct, Negative, Moderate, and Permanent. To mitigate this impact, the applicant has provided for a number of measures which include keeping a record of the existing architectural features. They will also label any material that need to be altered or moved. The process will also be overseen by a qualified architectural heritage specialist. It will be the responsibility of the specialist to ensure that all works comply with the methodology outlined in Appendix A16.3 of the EIAR. With these mitigation efforts, the impact magnitude is reduced from Medium to Low, resulting in a post-mitigation impact that is Direct, Negative, Slight, and Long-Term.

At Olcovar, where there is submissions from several residents, it is again proposed to provide a raised table which is again entirely appropriate and generally consistent with the principles in DMURS (Horizontal and Vertical Deflections). Land take is required from an area of southern portion of Olcovar to provide for the inbound bus lane. However, there is signal controlled priority at this point which has avoided the need for land take in the northern portion of Olcovar. This is entirely appropriate and generally consistent with the principles in DMURS (Bus Service).

I am satisfied based on the conclusion of the EIAR, that impacts in terms of air quality, noise and vibration, human health is acceptable. The loss of a trees to facilitate the proposed design is acceptable having regard to the long term benefits of the scheme and compensatory planting proposed.

9.2.3.11 Access at Dublin Road and the Barbeque Centre

The proposed access arrangement at Dublin Road and the Barbeque Centre is entirely appropriate and generally consistent with the principles in DMURS (Vertical or Horizontal Deflection). It is noted that only a temporary land acquisition is required in the bell entrance area at this location in order to facilitate construction works. No permanent land take is required and it is not proposed to alter the boundary.

It is noted that concrete sett paving is proposed across the existing footpath at the entrance to the Barbeque Centre which will act as a deflection for private vehicles. It will encourage drivers to slow down when approaching this area. Thus, improving safety and enhancing accessibility and connectivity for vulnerable road users. While the concerns of observers are noted, such measures are in the interest of safety for the most vulnerable road users and will be of minor inconvenience to drivers and customers of these businesses.

The operational function of the business premises remains unchanged and the arrangement of how vehicles access the business is not materially affected by the proposed scheme. The disruption during construction as a result of works on the main carriageway is fully considered in the EIA and considered acceptable and not detrimental to the operation of the site. Access and egress will be maintained. During operation, access will revert to that existing, save for the pedestrian deflection.

It is noted that Crinken Cottage (former Gate Lodge to Shanganagh Castle) (RPS 1850) is located south of the Barbeque Centre. There is no changes proposed to this site and the proposed scheme will have no material impact.

9.2.3.12 Junction at Dublin Road with Crinken Lane

The proposed raised table at Dublin Road with Crinken Lane is entirely appropriate and generally consistent with the principles in DMURS (Horizontal and Vertical Deflections). It will encourage drivers to slow down when approaching this area. Thus, improving safety and enhancing accessibility and connectivity for vulnerable road users. While the concerns of observers are noted, such measures are in the interest of safety for the most vulnerable road users and will be of minor inconvenience to drivers.

From this point there is significant land take on the western side of the existing carriageway. This includes the setting back of gateway, railings and walls (RPS 2074) at Crinken Lodge. This also impacts on a side garden to the lodge on the

property. I am satisfied based on the conclusion of the EIAR, that impacts in terms of air quality, noise and vibration, human health is acceptable. The loss of a trees to facilitate the proposed design is acceptable having regard to the long term benefits of the scheme and compensatory planting proposed. It is noted that replanting is proposed.

9.2.3.13 Junctions at Dublin Road with Aillies River Road and Shanganagh Castle

The proposed raised table at Dublin Road with Aillies River Road and Shanganagh Castle is entirely appropriate and generally consistent with the principles in DMURS (Horizontal and Vertical Deflections, Junction Design). It will encourage drivers to slow down when approaching this area. Thus, improving safety and enhancing accessibility and connectivity for vulnerable road users. While the concerns of observers are noted, such measures are in the interest of safety for the most vulnerable road users and will be of minor inconvenience to drivers.

The proposed signalised junctions at Shanganagh Castle and bus stops have been coordinated with the development proposals and incorporated within the design.

It is noted that a tree removal is required along certain western sections of the proposed schemes in order to facilitate it. In certain sections roadside trees have been retained by locating the proposed footpaths and cycle tracks behind the tree line. While it may not be desirable to loss certain trees, hedging and walls/piers, I am satisfied that the mitigation proposed by the applicant in terms of supplemental planting and reinstatement is sufficient.

9.2.3.14 Junction of Dublin Road with Shanganagh Park and Cemetery

The proposed raised table at Dublin Road with Shanganagh Park is entirely appropriate and generally consistent with the principles in DMURS (Horizontal and Vertical Deflections, Junction Design).

It will encourage drivers to slow down when approaching this area. Thus, improving safety and enhancing accessibility and connectivity for vulnerable road users. While the concerns of observers are noted, such measures are in the interest of safety for the most vulnerable road users and will be of minor inconvenience to drivers.

The lack of pedestrian crossings to this recreational amenity is noted . However, two new toucan crossings are proposed on Dublin Road within a distance of 250 meters of either side of Shanganagh Park. While these are considered appropriate, it is

noted that on the inbound section a bus stop has been retained directly opposite the park entrance which would be undoubtedly used by park goers. It is unlikely a pedestrian would walk 200m north or 170 m south to access the park entrance directly opposite a bus stop. It is recommended that an additional pedestrian crossing by way of condition be provided at this location in the interest of safety – should the Board be minded to grant planning permission.

It is noted that a tree removal is required along certain western sections in order to facilitate the proposed scheme. In certain sections roadside trees have been retained by locating the proposed footpaths and cycle tracks behind the tree line. At Shanganagh Park and Shanganagh Cemetery, the northbound and southbound cycle track are proposed to be diverted into the park, alongside the southbound footpath, and behind green space and existing trees to the eastern side of the carriageway between two Toucan Crossings, with a newly proposed cemetery boundary wall set back to enable the retention of the roadside tree line. While it may not be desirable to lose certain trees, hedging and walls/piers, I am satisfied that the mitigation proposed by the applicant in terms of supplemental planting and reinstatement is sufficient. I note the concerns about the loss of Category A trees and certain localised alterations to the construction methodology may result in their retention.

It is noted that there are several protected structures on the western side of the carriageway also including the Orchard Gate Lodge (RPS 1987), Shanganagh Marble and Stone Centre (Memorial Hall and the Railings and Gates and Granite Milestone) (RPS 1858), Askefield House (RPS 1860), Askefield House Gate Lodge (RPS 2001), Beauchamp House (RPS 1862). These are part of larger demesne landscapes and will be impact by the removal of trees which contribute to the sylvan landscape as well as the setting back of wall which are of built heritage significance. However, I am satisfied, the loss of trees and setting back of walls to facilitate the proposed design is acceptable having regard to the long term benefits of the scheme and compensatory planting proposed. I am satisfied based on the conclusion of the EIAR, that impacts in terms of air quality, noise and vibration, human health are acceptable.

9.2.3.15 Access to St James Church

It is proposed to widen the road on the west side of the Dublin Road at the location of St James's Church which is a protected structure (RPS 1863). Access and egress, which is not impacted and temporary land take is required for construction of the scheme. Further south at the St James Church the Parsonage, it is proposed to widen the road on the east side of Dublin Road, which requires land take from The Parsonage to facilitate the Proposed Scheme cross section. As a result, there will be no impact to trees along the frontage of St James Church. There will be an impact to the existing tree group along the inside of The Parsonage boundary wall. This is considered acceptable.

9.2.3.16 Junction of Dublin Road with Woodbrook Avenue and Woodbrook Downs

The proposed arrangement of the junction at Dublin Road with Woodbrook Avenue and Woodbrook Downs is entirely appropriate and generally consistent with the principles in DMURS (Junction Design).

It is noted that a tree removal is required along certain western sections of the proposed schemes in order to facilitate it. In certain sections roadside trees have been retained by locating the proposed footpaths and cycle tracks behind the tree line. The proposed signalised junctions at Woodbrook and bus stops have been coordinated with the development proposals and incorporated within the design.

It is noted that lands at Beauchamp Lodge (Exterior Only) (RPS 2042) will be altered by the proposed scheme. The existing driveway access onto Dublin Road will be removed and new replacement boundary wall realigned to the footpath. Revised access will be provided on Woodbrook Downs and the garden reinstated and tree planting provided as required. The boundary is not of heritage value. In the interest of safety, the proposed approach is entirely justified. It is accepted that there would be some impact to the existing garden and ornamental planting. However, these can be replaced.

9.2.3.17 Arrangement at Dublin Road with Woodbrook House

The proposed widening at the inbound carriage way from Woodbrook College and Woodbrook House is appropriate and generally consistent with the principles in DMURS (Bus Service, Footways, Verges and Strips, Cycle Facilities).

The proposed scheme is consistent with the Woodbrook-Shanganagh LAP, and the proposed scheme is required in order to achieve its wider objectives for the residential development of the area by providing a reliable and efficient public transport system. Zoning analyses in Sections 4.3 and 4.4 of the Planning Report confirm that the scheme is consistent with DLRCC policies, primarily occupying existing road/pavement areas, with minimal impact on zoning objectives. It is acknowledged that there is competing policy objectives between mobility schemes and heritage receptors, however, the proposed scheme is in accordance with same and has sought to minimise the impacts such receptors.

The historic gated entrance to Woodbrook Estate will not be affected by carriageway widening, and the footway in front will feature enhanced stone setts and granite kerbs. However, the proposed southbound bus stop and carriageway widening near Woodbrook College will result in the removal of some mature trees and a setback of the wall. I am satisfied that careful planning has been done to minimise tree loss and maintain a row of mature trees further back. Additionally, the wall reinstatement north of the M11 diverge junction will match the stone material used in the surrounding area. This is acceptable.

The proposed land take on the east side of the Dublin Road will affect two 19th-century demesne walls

The applicant has assessed Corke Lodge and Woodbrook House. At Croke Lodge the sensitivity is considered medium as result of the removal and reinstatement required. It is noted that new openings in the wall have already been approved under a separate application for the Woodbrook Strategic Housing Development (SHD). There will be direct, negative and temporary construction phase impacts.

The boundary wall at Woodbrook House will also be removed and reinstated. However, in certain parts it is a replacement rather than the original wall and is therefore classified as low sensitivity by the applicant. Therefore, the impact to the demesne wall is less significant at this location. The construction phase impacts will be similar to that described for Corke Lodge.

To mitigate this impact, the applicant has provided for a number of measures which include keeping a record of the existing architectural features. They will also label any material that need to be altered or moved. The process will also be overseen by a qualified architectural heritage specialist. It will be the responsibility of the

specialist to ensure that all works comply with the methodology outlined in Appendix A16.3 of the EIAR. After these mitigations are applied the applicant is of the view that the impact will be low. This results in a long term non-significant impact.

The proposed development will have a significant impact on both individual trees and stands of trees at this location. These have been identified in the Arboricultural Impact Assessment and are of varying conservation value.

In order to mitigate the losses of trees at this location, the applicant proposes planting a variety of new trees along the estates boundary. This will enhance the landscape of the area over time. In addition, trees that will be retained can be protected during the construction phase.

The summary assessment from the EIAR indicates that while the construction phase will negatively impact trees significantly in the short term, these effects will diminish over time with the growth of replacement trees. During the operation phase, as trees mature and become established, the negative effects will reduce.

The applicant has confirmed that trees with a mix of ages and species will be planted. The photomontages provided by the applicant show the expected view and the anticipated growth of the trees over a 10 and 15 year period post construction. These illustrate that the short term visual impact will reduce over time and that the planting will ensure a reduced visual impact in the long term. While it may be preferable to retain all landscape features, the applicant has sought to minimise the loss and balance the requirements of a public transport scheme.

I am satisfied that the EIA has evaluated the potential impacts on architectural heritage due to the construction and operation of the Proposed Scheme including at Woodbrook House and adjacent features. The impact to the demesne landscape has also been consider in the Landscape and Visual section.

9.2.3.18 Arrangement at Dublin Road with Woodbrook College

On the opposite (western) side of the road, I note submissions from the owner/occupier of Woodbrook College and Wilford Lodge. From Beauchamp Lodge, the existing boundary wall and vegetation will remain and there will be no material impact to the Aske Gate Lodge and its gates, railing and walls. At the Woodbrook College, there are currently three vehicular entrances. One on the northern end is habitually closed, due to the location of surfaced playing courts inside it. The other

two operate as a one-way vehicular access and egress. The existing inset bus stop outside the school will be aligned with the road and a wider area will be paved and realigned with the inclusion of a cycle lane. Two trees in front of the college will be removed and replanted further in to facilitate the widening. Access and egress to the school will be maintained and the intervention is minimal and a formalisation of the space which is largely in the public domain already. At Wilford Lodge, the existing boundary wall and vegetation will be retained and however, the property may experience disruption during construction phase. This is all entirely acceptable and consistent with DMURS.

It is noted that that applicant has not maintained pedestrian priority at the entrance to the school itself. Should the Board remain concerned about pedestrian priority at these junctions, in the interest of safety, a condition could be attached to the granting of any permission that a vertical or horizontal deflection be included in the detailed design. The Board should consider this fully prior to any decision given it may have implications on the overall movement and design of the proposed scheme.

Junction of Dublin Road with M11 Merge/Diverge (Wilford Roundabout)

It is proposed to replace the Wilford Roundabout with a new signalised junction. The proposed arrangement of the junction is entirely appropriate and generally consistent with the principles in DMURS (Junction Design).

While the existing roundabout may have served vehicular traffic well at this location, there is a safety issue arising for pedestrians and cyclists who find roundabouts more difficult to navigate where there is a lack of controlled crossings/cycle facilities . Given the spatial constraints and amount of land-take required for roundabouts, a signalised junction is more appropriate given the requirement to introduce bus priority and safe facilities for pedestrian and cyclist.

The use of large roundabouts should be restricted to areas with lower levels of pedestrian activity. Large roundabouts are defined in DMURS as those with radii greater than 7.5m, the current roundabout has an inscribed circle diameter/radius, of approximately 60m/30m Where large roundabouts currently exist, road authorities are encouraged, as part of any major upgrade works, to replace them with signalised junctions. Otherwise, roads authority should retrofit them so that are more compact and/or pedestrian and cycle friendly, as is appropriate. However, given the multi-modal objectives for this scheme, which also requires bus priority this would not be

possible. While I note the submission of the Bray Retailers Group in respect of the roundabout, I am satisfied that the EIAR has fully considered the traffic and transport implications at this junction and the proposed design meets the objectives of the proposed scheme.

It is noted that this signalised junction design will result in an inbound bus lane up to the junction and will be supplemented with Single Control Priority as there is no bus lane until after Woodbrook College.

Finally, should the Board in their assessment compare and contrast the Wilford Roundabout, which will be signalised, with Loughlinstown Roundabout, which will not be signalised. I would make the distinction that the pedestrian and cyclist environment is entirely different at this Wilford. As is the historic built environment. Roundabouts require additional land take and upgrading Wilford Roundabout to facilitate both buses, cyclists and pedestrians would result in additional land take at and impacts to Wilford House (RPS 1873), Woodbrook House and its demesne features (RPS 1870) and the Woodbrook Side Lodge (RPS 1874) including associated impact to trees and walls. Loughlinstown Roundabout does not have those heritage constraints and there is existing pedestrian and cycle facilities largely in place to safely move vulnerable road users.

9.2.4 Section 4 Bray North (Wilford Roundabout) to Bray South (Fran O'Toole Bridge).

9.2.4.1 Carriageway Widening on Dublin Road (Demolition of Woodbrook Side Lodge)

The proposed scheme will significantly impact the existing Woodbrook Side Lodge (RPS No: 1874, NIAH: 60260162), which is located to the south-west of the Woodbrook Estate and south of the Wilford junction. It is proposed to demolish the existing lodge and build a new lodge building further east of its present location in order to allow for road widening in that area. This arrangement is illustrated in Drawing BCIDB-JAC-BLD_ZZ-0013_XX_01-DR-AA-0001 and BCIDB-JAC-BLD_ZZ-0013_XX_02-DR-AA-0001.

The lodge forms part of the demesne landscape of Woodbrook House (RPS No. 1870, NIAH: 60260157). The gate lodge has been assessed by the NIAH as being of Regional Importance and is therefore of Medium Sensitivity. Section 6.8.11 of the Architectural Heritage Guidelines (DAHG 2011) indicates that a robust justification is

necessary for the demolition of a protected structure to be permitted, and that every alternative to demolition must be thoroughly examined. In addition, the Board shall not grant permission for the demolition of a protected structure or proposed protected structure, save in exceptional circumstances under Section 57(10)(b) of the PDA.

As outlined in Section 3.4.1.4.1 of the EIAR (Consideration of Reasonable Alternatives), several alternatives to the demolition of the lodge were explored. The It is noted in the alternatives considered by the applicant that the do minimum scenario would only lead to increased queuing at the Wilford junction. This would have resultant impacts for public transport and reduce the ability to provide cycle infrastructure at this busy junction. Other options considered included widening the road westward to minimise impact on Woodbrook Side Lodge. However, this would result in other negative environmental impacts due to the land take required

Widening both sides of the road would also impact properties and additional heritage features, increasing environmental impacts.

The preferred approach is to widen to the east with a full cross-section, promoting the most efficient public transport service - this is in line with plethora of national transport objectives set out in previous sections of this report. However, the Board should be in no doubt that the demolition conflicts to several policy objectives in the DLRCDP including:

- Policy Objective CA6: Retrofit and Reuse of Buildings
- Policy Objective HER20: Buildings of Vernacular and Heritage Interest (where appropriate)
- Policy Objective HER8: Work to Protected Structures

In respect of Policy Objective CA6 and HER20, the policy provides the caveats, where possible or appropriate, when seeking to retain protected structures. On the basis of the argument put forward by the applicant in the Consideration of Reasonable Alternatives section of the EIAR, it is clear that its retention is not possible or appropriate in this instance based on a multi-criteria analysis which I consider reasonable. Policy Objective HER8 which deals specifically with protected structures does not mention ‘demolition’ specifically, but it is obvious that demolishing such a structure may ‘negatively impact their special character and appearance’. While not mentioning demolishing, it does defer to the Architectural

Heritage Protection Guidelines for Planning Authorities which brings the justification to demolish back to ‘exceptional circumstances’.

It should be expanded also at this point, that the proposed scheme includes the mitigation of constructing a larger replacement lodge (to meet Building Regulations), relocating boundary walls and gates, and salvaging existing materials where possible. However, let us be clear, this will result in the loss of historic fabric and alter the relationship with surrounding structures, with the impact deemed significant and permanent. Not replacing the lodge would lead to the total loss of the Side Lodge, further harming the historical landscape and relationships within the Woodbrook House demesne, also resulting in substantial negative and lasting impacts.

The current setting of the Lodge is such that it adds little to the architectural heritage of the area. Given the small scale of the Lodge, its dismantlement and reassembly is not an overly complex task and the continued presence of a new Lodge at this location would make a positive contribution to the architectural heritage of the community. The location now proposed with new widened vehicle access (3.1m opening) is a more appropriate location in the context of the proposed scheme and road. I am of the opinion that it will be a more distinct architectural features in revised location and features like the piers will demarcate the importance of the site as a gate lodge.

It is acknowledged that the protected structure is in its original location on and within a demesne landscape related to Woodbrook House and therefore, a link does remain between the two. However, the context of this location has changed irreversibly, primarily due to the construction of the Wilford Roundabout and adjacent motor dealership which has impacted the demesne wall. Its setting has been severely impinged upon. The protected structure no longer functions as gate access and avenue to the demesne. Instead of the Gate Lodge being located some metres within the boundary wall, as was traditional, the building now sites immediately inside an inappropriately detailed boundary wall.

It is noted that the submissions of the DHLGH, DLRCC and their competent experts raised no material issues with regard to the demolition and reinstatement. A submission form the owner/occupier was received and sought alternative design for a shared cycle and bus lane, to lessen the impact to the demesne and Side Lodge. I am satisfied that the applicant has extensively considered reasonable alternatives.

The design and need for the proposed scheme, including the extensive consideration of alternatives. The Board can be satisfied that the Architectural Impact Assessment presented in support of the proposed scheme adequately address the full extent of impacts on the protected structure. It is therefore concluded that the development, if permitted would not materially or adversely affect the character and setting of the demesne landscape and would, therefore, be consistent to the proper planning and sustainable development of the area.

In conclusion, having regard to:

- the strong justification provided in Chapter 16 Architectural Heritage of the EIAR by Cathal Crimmins (B.Arch, MArch Sc (Conservation of Towns and Buildings), RIAI Grade 1 Accredited Conservation Architect, FRIAI, MRIBA), an architect with specialist knowledge who considered all alternative options, other than demolition.
- the relationship with the parent estate and Woodbrook House and its location on the periphery to the demesne landscape, the already eroded state of the demesne landscape at this location as a result of the construction of the Wilford Roundabout (which resulted in the replacement of the historic demesne boundary wall), the proximity of the motor dealership and petrol station, and the existing trafficked road that in my view makes demolition permissible.
- the mitigation measures to be implemented which includes reinstatement of the gate lodge, albeit, at an altered location which reduces the significance of any impact to the cumulative historic interest of the wider Woodbrook Demesne.
- the provisions of the DLRCDP and requirements set out in the Architectural Heritage Protection Guidelines for Planning Authorities which seek to protect the built heritage and, in this individual instance and in the absence of alternative options, the need to balance same with an overriding, common good transport objectives in relevant national, regional and local level policies which support the proposed scheme.
- the requirement to improve road safety through improvement works at key junctions and upgrades to the pedestrian and cycling infrastructure as well as increasing the bus network capacity, and
- the submissions received in respect architectural heritage being impacted by the proposed scheme.

I am satisfied that exceptional circumstances existing for the demolition of Woodbrook Side Lodge.

The proposed widening at the inbound carriage way from Woodbrook Side Lodge is appropriate and generally consistent with the principles in DMURS (Bus Service, Footways, Verges and Strips, Cycle Facilities).

9.2.4.2 Carriageway Widening on Dublin Road from Windsor Motors to Croke Abbey Avenue

The proposed widening at the inbound carriage way from Woodbrook Side Lodge to Croke Abbey Avenue is appropriate and generally consistent with the principles in DMURS (Bus Service, Footways, Verges and Strips, Cycle Facilities).

The design has to promote sustainable forms of transport which it has done with the introduction of a dedicated cycle lane and bus priority. It is noted that access and egress to commercial and residential properties will be maintained. It is noted that Windsor Bray will have a smaller operational area as a result of the widening, and while disruptive, it is not considered detrimental to the use of these spaces for such operations.

The loss of green areas to the front of 1-14 Dublin Road is acceptable and largely grassed areas outside these walled properties which already read as if they are part of the public domain. It is noted that 5-7 Dublin Road do extend their walled properties out to the existing footpath. However, in all cases they will maintain a substantial front garden, sufficient parking and have their walled property reinstated, albeit set back from its original location.

9.2.4.3 Junction of Dublin Road with Corke Abbey Avenue and Old Connaught Avenue

The proposed arrangement of the junction at Dublin Road with Corke Abbey Avenue and Old Connaught Avenue is entirely appropriate and generally consistent with the principles in DMURS (Junction Design).

The omission of left turn slips, which generally provide little extra effective vehicular capacity but are highly disruptive for pedestrians and cyclists is the correct approach. Their removal is also required to cater for the proposed bus lanes. It is noted that buses can be managed successfully thought the outbound signal controlled priority.

9.2.4.4 Arrangement at Circe K Bray

The proposed widening at the outbound carriage at Circe K Bray and AXA is appropriate and generally consistent with the principles in DMURS (Bus Service, Footways, Verges and Strips, Cycle Facilities).

The design has to promote sustainable forms of transport which it has done with the introduction of a dedicated cycle lane and bus priority. It is noted that access and egress to the commercial property will be maintained. In order to make space for the wider cross-section at this location, the outer four pumps (out of a total of eight) will be removed, and the canopy size will be reduced. The petrol station, which will have four pumps, will be reinstated. This arrangement is illustrated in Drawing BCIDB_JAC_SPW_AW-0013_XX_00_DR_001.

It is noted that Circle K will have a smaller operational area as a result of the widening and is expected to have an adverse impact on the business during the operation of the scheme. In terms of design, however, I am satisfied the operations at Circle K can be reconfigured to facilitate a petrol station use.

Presently, at this location on the Dublin Road, there is a footpath and traffic lane in both directions with an outbound cycle lane which breaks for a short section at the service station. This is a main artery into and out of Bray. In order to avoid acquiring lands at this location it would likely result in the exclusion of the bus lanes. There may be space available to provide for cycle facilities. This would remove any impact to the service station.

However, the primary objective of the proposed scheme is to provide for the sustainable movement of people along this artery and in particular providing for bus priority - this is the core community need. The exclusion of the bus lane would impact the bus priority and on a network level fragmentation of the bus lane which will be established from Wilford Roundabout to the Castle Street Shopping Centre, save for a minor pinch point at the junction of Upper Dargle Road where a building line is established. The NTA acknowledged the proposed scheme will result in a significant impact to the operation of this business and suggests that this could be addressed via the compensation process.

It is clear that the proposed works were essential to the achievement of the scheme objectives and that all other alternatives were considered in an attempt to reduce the impact to this business but were none of the alternatives were considered to be

appropriate. Thus, having regard to the arguments made by the business representatives and those of the NTA I consider an alteration to this arrangement would undermine the proposed scheme and as such whilst I acknowledge the significant affect that the proposed development will have on the fuel station income and viability, I am satisfied that the proposed works are proportionate and necessary to achieve the objectives of the proposed scheme.

9.2.4.5 Junction of Dublin Road with Chapel Lane and Ravenswell

The proposed arrangement of the junction at Dublin Road with Chapel Lane and Ravenswell is entirely appropriate and generally consistent with the principles in DMURS (Junction Design).

The design has to promote sustainable forms of transport which it has done with the introduction of a dedicated cycle lane and bus priority

9.2.4.6 Junction of Dublin Road with Upper Dargle Road

The proposed arrangement of the junction at Dublin Road with Upper Dargle Road is entirely appropriate and generally consistent with the principles in DMURS (Junction Design).

The omission of the outbound left turn slips, which generally provide little extra effective vehicular capacity but are highly disruptive for pedestrians and cyclists is the correct approach. Their removal is also required to cater for the proposed bus lanes. The design has to promote sustainable forms of transport which it has done with the introduction of a dedicated cycle lane, bus priority and signal controlled priority for buses. It is accepted that there is a pinch point on the western side of the street which follows a building line. While widening is occurring on the eastern side, given the curvature of the road, it is only useful to a point and cannot ensure bus lanes on both sides through the junction.

9.2.4.7 Junction of Castle Street with St Cronan's Road and the Dargle Centre

The proposed widening at the inbound carriage way at the junction of Castle Street with St Cronan's Road and the Dargle Centre/FirstStop-Fast-Fit is appropriate and generally consistent with the principles in DMURS (Bus Service, Footways, Verges and Strips, Cycle Facilities).

Firstly, the design has to promote sustainable forms of transport which it has done with the introduction of a dedicated cycle lane and bus priority. The loss of parking

spaces at the Dargle Centre/FirstStop-Fast-Fit is acknowledged and it is foreseeable that the lack of on-street parking can lead to poor parking behaviour from drivers who kerb mount and park on footpaths/cycle lanes and additional pressure for parking on adjoining streets. However, there is considerable space to provide off-street parking at the Dargle Centre and there is sufficient on street parking in the vicinity of this location (e.g. adjoin streets, Castle Street Shopping Centre) to offset such a concern. It is noted that access and egress to the commercial property will be maintained. It is noted that the Dargle Centre will have a smaller operational area as a result of the widening, and while disruptive, it is not considered detrimental to the use of these spaces for such operations.

Presently, at this location on Castle Street, there is a footpath and traffic lane in both directions with substandard bus and cycle facilities. On the outbound side, at the Dargle Centre a bus lane commences but no cycle facilities exist. This is a main artery into and out of Bray. In order to avoid acquiring lands at this location it would likely result in the exclusion of the outbound bus lane and cycle lane. This would remove any impact to the Dargle centre.

However, the primary objective of the proposed scheme is to provide for the sustainable movement of people along this artery and in particular providing for bus priority - this is the core community need. The exclusion of the bus lane would impact the bus priority and on a network level fragmentation of the bus lane which will be established from Wilford Roundabout to the Castle Street Shopping Centre, save for a minor pinch point at the junction of Upper Dargle Road where a building line is established.

It is clear that the proposed works were essential to the achievement of the scheme objectives and that all other alternatives were considered in an attempt to reduce the impact to this business but were none of the alternatives were considered to be appropriate. Thus, having regard to the arguments made by the business representatives and those of the NTA I consider an alteration to this arrangement would undermine the proposed scheme and as such whilst I acknowledge the affect that the proposed development will have on business operations, I am satisfied that the proposed works are proportionate and necessary to achieve the objectives of the proposed scheme.

9.2.4.8 Arrangement at Castle Street with Castle Street Shopping Centre

The proposed widening at the outbound carriage way at Castle Street with Castle Street Shopping Centre is appropriate and generally consistent with the principles in DMURS (Bus Service, Footways, Verges and Strips, Cycle Facilities).

The design has to promote sustainable forms of transport which it has done with the introduction of a dedicated cycle lane and bus priority. It is noted that access and egress to the commercial property will be maintained.

There are currently 132 informal parking spaces located in the Castle Street Shopping Centre. It is proposed to reconfigure the existing car park which will result in an overall loss of 13 car parking spaces. It is accepted that the shopping centre will have a smaller operational area as a result of the widening. This will be disruptive for the operator of this business; however, it is not considered detrimental to the use of these spaces for such operations.

Presently, at this location on Castle Street, there is a footpath and traffic lane in both directions with an outbound bus lane and inbound cycle lane. This is a main artery into and out of Bray. In order to avoid acquiring lands at this location it would likely result in the exclusion of the inbound bus lane. This would remove any impact to the shopping centre.

However, the primary objective of the proposed scheme is to provide for the sustainable movement of people along this artery and in particular providing for bus priority - this is the core community need. The exclusion of the bus lane would impact the bus priority and on a network level fragmentation of the bus lane which will be established from Wilford Roundabout to the Castle Street Shopping Centre, save for a minor pinch point at the junction of Upper Dargle Road where a building line is established.

It is clear that the proposed works were essential to the achievement of the scheme objectives and that all other alternatives were considered in an attempt to reduce the impact to this business but were none of the alternatives were considered to be appropriate. Thus, having regard to the arguments made by the business representatives and those of the NTA I consider an alteration to this arrangement would undermine the proposed scheme and as such whilst I acknowledge the affect that the proposed development will have on business operations, I am satisfied that

the proposed works are proportionate and necessary to achieve the objectives of the proposed scheme.

9.2.4.9 Junction at Castle Street with Lower Dargle Road and Ravenswell Road (Tie-In)

The proposed raised table at the junction of Castle Street with Lower Dargle Road and Ravenswell Road (Tie-In) is entirely appropriate and generally consistent with the principles in DMURS (Horizontal and Vertical Deflections, Junction Design).

At the tie-in of the Proposed Scheme, where it connects to the Fran O'Toole Bridge, the northbound bus lane begins just past the Lower Dargle Road junction. Therefore, the area where the Proposed Scheme terminates features a southbound bus lane, two lanes for general traffic, and a cycle track in both directions on the immediate approach to the Fran O'Toole Bridge on Castle Street, marking the end of the Proposed Scheme.

The raised tables at side roads will encourage drivers to slow down when approaching this junction from side roads. Thus, improving safety and enhancing accessibility and connectivity for vulnerable road users. Such measures are of minor inconvenience to drivers and . have been successfully implemented on several locations and are effective.

9.3 General Design

9.3.1 Tree Removal and Replanting

The proposed scheme will have a significant impact on the existing landscape character of the area, in particular Section 3 Loughlinstown Roundabout to Bray North (Wilford Roundabout). The details of which are set out in Appendix A17.1 Arboricultural Impact Assessment of the EIAR.

This is largely as a result of the anticipated loss of trees at various locations. A tree survey, which identified 1,611 individual trees, groups of trees and garden hedges, was carried out in accordance with relevant standards and categorised. The proposed scheme will require the removal of 410 individual trees, groups of trees and garden hedges. This loss represents approximately 25%.

Table 31: Quantity of Trees to be Removed

Category		Existing	To be Removed
A	High Arboricultural Quality	144	30
B	Moderate Arboricultural Quality	631	135

C	Low Arboricultural Quality	795	245
U	Poor Arboricultural Quality	41	N/A
	Total	1611	410

The antipathy of several observers and indeed the planning authorities and prescribed bodies to the loss of such trees is understood.

All local authorities have policy measures to protect trees. This includes general measures within the development plans, local area plans which include tree protection objectives and preservation orders, biodiversity plans, climate action plans and indeed tree strategies specifically. Of note is the current the DLR Tree Strategy: A Climate for Trees: Tree Strategy 2023-2030, which was adopted by the Council in 2023 and emphasises the need to retain healthy trees wherever feasible and advocating for proposed tree planting and species diversity. It is particularly relevant to Section 3 Loughlinstown Roundabout to Bray North (Wilford Roundabout). The Board should note that the DLR strategy also acknowledged trees in the context of transport infrastructure and consider there to be occasions when removals may occur where there is no alternative option such as for essential road/construction works – the proposed scheme plainly meets this criterion.

It is acknowledged that there is an inherent competition in policy between mobility schemes such as BusConnects, which also enjoy widespread policy support, and tree protection. On balance, however, I am satisfied that the applicant has been restrained in in its design and has sought to avoid to most significant of impacts to trees. The design of the proposed scheme is well justified, and while may not be desirable to remove trees or hedges that provide an immediate social and environmental benefit, the tree removal is needed to achieve to overall objectives of the scheme - the long term environmental and social benefits of which have been clearly set out.

I am satisfied that the applicant has sought to mitigate the impact by design which utilises trees where appropriate. However, in the course of such a scheme, all trees cannot be avoided and the loss of up to 410 trees over a 20 km scheme is reasonable and proportionate. The Board should also note that up to 41 trees would likely require removal over the next 10 years in any case dure to the physiological and structural condition. For reasons of safety, they pose and unacceptable risk to persons or property. This is entirely acceptable.

Furthermore, to address the loss of arboricultural features, it is anticipated that the landscape plan included with the application will provide a varied selection of new trees and plants along the route. This new vegetation will incorporate a range of tree species that will be selected based on the local environmental conditions at any particular location, as well as considering future site uses, ecosystem service provision, benefits to local communities, and enhancing the current tree population. The plan will also take into account potential future impacts from climate change, pests, and diseases. The Landscape General Arrangement drawings in Volume 3 of the EIAR show the proposed landscape plans, including areas of tree removal and locations and details of proposed new tree and vegetation planting. The proposed quantities to be planted are: 551 trees, 4,153m^2 of native tree planting and 1,662m of hedgerow with other areas of grassland and ornamental planting proposed. This is an acceptable mitigation and will improve the situation over time as planting becomes established.

It is accepted that the proposed tree replacements does not immediately offset the losses in local amenity, biodiversity, and impacts to the environment. The carbon sequestration attributed to the mature trees will be greatly reduced, as the replacement juvenile trees and species are unlikely to achieve similar levels of sequestration for several decades. The disruption to biodiversity including bats is well documented in the EIAR and assessed below in the climate section of the EIA. As is the impact to property along the route, in terms of air quality, noise, light and general amenity and sense of place. However, I note the applicant has provided a robust argument in respect of the wider benefits of the scheme in terms of climate in its EIAR and has factored in tree removal into its calculations. The predicted impact to climate during the Maintenance Phase is therefore Negligible and Permanent. The EIAR concluded that with the application of the proposed mitigation measures, the impact on biodiversity during the Construction Phase will not be significant beyond the local level.

I note in particular the removal of a large number of mature Category A and B trees at Woodbrook, DLRCC consider this entirely unacceptable. Additionally, some existing trees along the eastern side of Woodbrook Road would still be cut down to accommodate the proposed scheme, which is also unacceptable to DLRCC Again it is acknowledged that these trees are of exceptional quality, and significant efforts have been made to preserve them. Indeed, it is DLRCC's objective that new

developments shall, protect and preserve trees and woodlands as identified on the development plan maps. Such trees are identified along UCD, at the junction of Booterstown Avenue, Talbot Hotel, Patrician Villas, , Saint Rita's, Kentfield, Woodbank, Rathmichael Park, Dorney Court, Shankill Village, at and near the junction of Crinken Lane, Shanganagh Park Cemetery, Askefield House, Beauchamp House, St James Church and Woodbrook. I note DLRCC has sought alternative designs in this location, including signal controlled priority rather than implementing a continuous bus lane in both directions as proposed. This would retain some trees on both sides of the road at Woodbrook. However, on balance I am satisfied that the applicant has sufficiently considered the reasonable alternatives to the proposed scheme at this location and the removal of these trees is justified. It is noted that the WCC Tree Preservation Order at Ravenswell School (TPO B20) will not be impacted and can be protected and retained.

It is noted that the removal of trees, vegetation, lawns, paving etc. will be minimised in so far as practicable. It is noted that a number of measures are put forward to ensure this including

- Tree Protective Fencing & Barriers
- Construction Exclusion Zones
- Temporary Ground Protection
- Permanent Ground Protection
- Pollution Control
- Specialist Working Methods
- Arboricultural Monitoring & Supervision

It is noted that temporary measures can be put in place during construction where boundaries are removed such as hoarding to ensure lands are not left habitually open during this phase. This includes measures for livestock should it arise in certain sections south of Shankill at Askefield and Woodbrook for example.

It is recommended that a condition be imposed on the applicant to ensure tree removal is reevaluated prior to construction and in consultation with the planning authority for the area. The planned removal of the Category A and B trees listed in the Preliminary Design Tree Removal Plan (which is based on the current layout) may be avoided through detailed design and localised modifications in construction methodology. This could help preserve some important trees, which have taken

decades or longer to mature and provide substantial value in terms of climate mitigation, biodiversity, local heritage, and landscape character. For instance, I noted DLRCC would like to see the retention of T0135, a Horse Chestnut (Category A tree) in Shanganagh Park. This could be achieved through the detailed design and localised modifications in construction methodology. I also agree with DLRCC that an Arborist should be present on-site daily during tree removal to recommend methods and strategies for tree preservation. This again would minimise the number of trees that need to be removed.

In conclusion, having regard to:

- the strong justification provided in Chapter 3 Consideration of Reasonable Alternatives for the proposed scheme route corridor in which alternative options and the environmental impacts of same were considered.
- the supporting assessment in relevant topics including Chapter 7 Air Quality, Chapter 8 Climate, Chapter 9 Noise & Vibration, Chapter 10 Population, Chapter 11 Human Health, Chapter 12 Biodiversity and most significantly Chapter 17 Landscape (Townscape) & Visual which provides mitigation measures and includes a landscape plan with replanting.
- the mitigation measures to be implemented which includes replanting of trees and other vegetation, albeit, at an different location which reduces the significance of any impact over the long term.
- the provisions of the various county developments which seek to protect trees and indeed the requirements set out in the specific tree strategies adopted by local authorities, and in the absence of alternative options, the need to balance same with an overriding, common good transport objectives in relevant national, regional and local level policies which also support the proposed scheme.
- the requirement to improve road safety through improvement works at key junctions and upgrades to the pedestrian and cycling infrastructure as well as increasing the bus network capacity, and
- the submissions received from observer, the planning authorities and prescribed bodies in respect trees being impacted by the proposed scheme.

Overall and with the imposition of conditions, I am satisfied that the impacts are acceptable and during construction it may be possible to retain certain these trees.

9.3.2 Historic Boundary Removal and Reinstatement

Along the proposed scheme there is several sections of wall and boundaries that will be impacted. Many hold no architectural heritage value and their removal and reinstatement is considered acceptable in the context of the proposed scheme. The disruption to property along the route is well documented in the EIAR and assessed below in the various sections of the EIA in terms of air quality, noise, light and general amenity and sense of place. However, I note the applicant has provided a robust argument in respect of the wider benefits of the scheme and in my opinion the impacts in this instance are justified.

There are others Historic Boundary walls which are of architectural heritage value. These largely relate to the demesnes. This is particularly the case south of Shankill in Section 3 Loughlinstown Roundabout to Bray North (Wilford Roundabout) of the proposed scheme. At this location, the EIAR is explicit in that the impacts will generally be direct, negative, and long term even following the implementation of mitigation and monitoring measures.

The historic features which will be impacted include, inter alia:

- CBC0013BTH068: Granite Wall Dublin Road in Shankill
- CBC0013BTH064: Carezza, Dublin Road
- Rathmichael Parish Primary School (DLR RPS 1799)
- CBC0013BTH062: Saint Anne's Catholic Church (RMP DU026-109, DLR RPS 1805)
- CBC0013BTH045: Rubble Wall to the north of Castle Farm Dublin Rd Shankill
- CBC0013BTH043: Boundary Wall to Kiltuc Church (RMP DU026-054001)
- CBC0013BTH040: Demesne Wall of Sherrington House (NIAH 60260153)
- CBC0013BTH037: CBC0013BTH036: Demesne Wall of Crinken House (DLR RPS 2074, NIAH 60260151)
- CBC0013BTH035: Boundary Wall to the north of Allies River Road
- CBC0013BTH032: Boundary Wall to Askefield House (DLR RPS 1860)
- CBC0013BTH030: Demesne Wall of Beauchamp House (DLR RPS 1862)
- CBC0013BTH025: Demesne wall of Corke Lodge (DLR RPS 1869)
- CBC0013BTH024: Demesne Wall of Woodbrook House
- CBC0013BTH021: Woodbrook Side Lodge, boundary wall and entrance gates (DLR RPS 1874, NIAH 5676)

- Gates and Boundary Wall to Ravenswell House

The Board should note that certain walls identified above are not the original demesnes wall. Many of these were previously rebuilt or are simply 20th century boundaries with contribute to the local architectural character of the area.

But certain walls or part thereof do form part of the attendant grounds of protected structures, primarily where the parent house or structure is existing such as Saint Anne's Catholic Church, Crinken House, Askefield Beauchamp, Corke Lodge, Woodbrook. It is noted that Section 6.8.11 of the Architectural Heritage Guidelines (DAHG 2011) requires that a robust justification is provided where the demolition of a protected structure is proposed, and that every alternative to demolition must be thoroughly examined by the constant authority.

The need to widen the carriageway promote the most efficient public transport service requires the removal and reinstatement the walls (in line with Appendix A16.3 of the EIAR). This is in consistent with plethora of national transport objectives set out in previous sections of this report. However, the Board should be in no doubt that their removal and reinstatement may conflict with parts of several policy objectives in the DLRCDP including Policy Objective HER8: Work to Protected Structures which requires the protection and retention of important elements of built heritage including historic gardens, stone walls, entrance gates and piers and any other associated curtilage features.

On the basis of the argument put forward by the applicant in the Consideration of Reasonable Alternatives section of the EIAR, it is clear that its retention in place is not possible or appropriate in this instance based on a multi-criteria analysis which I consider reasonable. Policy Objective HER8 which deals specifically with protected structures does not mention the removal and reinstatement of historic walls specifically, but it is obvious that removing and reinstating such structures may ‘negatively impact their special character and appearance’.

It is acknowledged that the historic walls in certain cases are in their original location within a demesne landscape and therefore, a link remains between the walls and the parent structures. However, the context of the change, which includes the setting back of several metres would be minimal.

Having regard to:

- the strong justification provided in Chapter 16 Architectural Heritage of the EIAR by Cathal Crimmins (B.Arch, MArch Sc (Conservation of Towns and Buildings), RIAI Grade 1 Accredited Conservation Architect, FRIAI, MRIBA), an architect with specialist knowledge who considered all alternative options, other than their removal and reinstatement.
- the mitigation measures to be implemented which includes reinstatement of the walls, albeit, at an altered location which reduces the significance of any impact to the cumulative historic interest of the area.
- the provisions of the DLRCDP and requirements set out in the Architectural Heritage Protection Guidelines for Planning Authorities which seek to protect the built heritage and, in this individual instance and in the absence of alternative options, the need to balance same with an overriding, common good transport objectives in relevant national, regional and local level policies which support the proposed scheme.
- the requirement to improve road safety through improvement works at key junctions and upgrades to the pedestrian and cycling infrastructure as well as increasing the bus network capacity
- the submissions received from observer, the planning authorities and prescribed bodies in respect boundaries being impacted by the proposed scheme.

I am satisfied that exceptional circumstances exist for the removal and reinstatement of historic boundary walls along the route of the proposed scheme.

It is noted that the submissions of the DHLGH, DLRCC and their competent experts raised no material issues with regard to the removal and reinstatement. Submission form the owner/occupiers and indeed the public observations generally were received and sought alternative design for a shared cycle and bus lane, to lessen the impact to demesne walls. I am satisfied that the applicant has extensively considered reasonable alternatives.

The Board can be satisfied that the Architectural Impact Assessment presented in support of the proposed scheme adequately address the full extent of impacts on protected structures. It is therefore concluded that the development, if permitted would not materially or adversely affect the character and setting of demesne

landscapes and any associate protected structures and would, therefore, be consistent to the proper planning and sustainable development of the area.

9.3.3 Pedestrian Features

The proposed scheme generally includes for 2 m wide footpaths, with some exceptions noted in Section 4.0 of the EIAR. The proposed scheme also introduced simpler pedestrian crossings. This is achieved through the removal of left-slip lanes largely which reduced the number of crossing. In certain locations no pedestrian crossings are present but will be introduced. The number of controlled pedestrian crossings will increase from 119 to 176, and there will also be more raised table crossings on side roads.

The design meets DMURS guidelines for footpath widths and crossing designs. DMURS recommends footpaths should be 2 m wide, with a minimum of 1.8 meters. In constrained areas, an acceptable minimum width can be 1.2 meters for short stretches.

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 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.

9.3.4 Cycling Features

9.3.4.1 Cycle Lanes

Given the nature of the proposed scheme, its location and traffic speeds, the provision of segregated cycle infrastructure will be a significant improvement over the current situation particularly in Section 1 Leeson Street to Donnybrook (Anglesea Road Junction) and Section 4 Bray North (Wilford Roundabout) to Bray South (Fran O'Toole Bridge). The proposed scheme will provide a safe facility for cyclists of all abilities to utilise and will undoubtedly increase the modal share in favour of cycling. 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 has an overall length of approximately 18.5 km. The proportion of segregated cycle facilities will increase from 47% on the existing corridor to 91%. Segregated cycle tracks are to be provided along approximately 16.5 km inbound (up from 8.0 km) and 16.9 km outbound (up from 9.4 km).

In response to submissions, it t is not possible to retrofit the optimal infrastructure design without considerable impact to existing properties at locations whereby the road width is narrow. Both tree and boundary removal is required. However, I am satisfied that the applicant has provide adequate mitigation in the form of replanting and boundary reinstatement. Many suggest alternatives to tree and boundary removal which would result in the removal of segregated cycle infrastructure in the first instance. However, it would be remiss of the applicant not to provide safe infrastructure where possible. On the basis of the EIA below, the provision of such infrastructure is acceptable in terms of impacts to air quality, noise, light and general amenity and sense of place.

The Board should be aware that all deviations from design standards are detailed in various tables in the EIAR. The standards have generally reduced where the applicant ha sought to preserve trees and create wider footpaths where pedestrian flow is higher. am confident that the applicant has aligned the cycle infrastructure with the requirements outlined in the cycle and manual and DMURS. Overall, however the applicant is expected to meet the 2m width design for cycle lanes. This width of 2m is set out in the National Cycle Manual and allows cyclists to overtake safely. I note several submissions who are of the view that the cycle lanes should be wider than 2m, up to 2.25m and include green buffer areas to separate them form the main carriage way.

Even though the majority of the proposed scheme includes 2-meter wide cycle lanes, the applicant argues that the proposed scheme is being developed within a constrained urban environment, making wider cycle tracks impractical in some areas. Therefore, some areas do reduce to a minimum width of 1.8 or 1.5m. This is particularly the case to facilitate bus stops in certain locations and to ensure cyclists slow down on approach to them. This is appropriate to ensure the safety of all users, particularly at island bus stops and shared landing zone bus stops. These design measures assist those with mobility or visual impairments in particular.

Given this context, I am satisfied that the applicant has convincingly shown the necessity for the proposed width reductions, and I recognise that the overall scheme represents a significant improvement in cycle infrastructure. 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 including at sections along Morehampton Road Shanganagh Park and Woodbrook.

I am satisfied that the applicant has adequately justified the design approach and it is clear from the layout of the different types of cycle lanes that there will be a significant improvement in terms of safety and accessibility for cyclists. In addition, having a consistent design approach throughout the city will provide legibility within the streetscape for all users that is currently absent.

9.3.4.2 Cycle Junctions

A key point made in submissions is that junction design should be in a Dutch-style which greater priority for cyclists and pedestrians. Other submissions from third parties are of the view that the introduction of revised junctions will only result in additional traffic delays and create a conflict between different modes.

I am satisfied that the applicant has justified the design of all junctions in the context of its PDGB. This is supplemented by a Junction Design Report (Appendix A6.3). I agree with the applicant that given the multimodal movements at junctions that once size will not fit all. However, I am satisfied that the applicant's design has been informed by a Dutch style where appropriate as set out in the Dutch Design Guide 'Ontwerpwijzer Fietsverkeer'. Furthermore, I am satisfied in the NTA's assessment of each unique junction which have different needs. I note the applicants four main junction designs in Appendix L of the Junction Design Report which are consistent with the PDGB and includes the provision of relevant safety features for vulnerable users including visually or mobility impaired persons.

Overall, I am satisfied that the applicant has justified the approach taken to reached the submitted design, which is being retrofitted into an existing and complicated

environment in terms of different travel modes, users, utilities and most importantly space constraints.

9.3.4.3 Integration with Other Schemes

The applicant has considered the interaction with other public transport scheme, cycling infrastructure provisions and public realm interventions -which has been raised within the third party submissions – including, the Fitzwilliam Cycle Route, Grand Canal, Dodder Greenway the now operational Deansgrange Cycle Lane Improvements, Killgobbet Park and Shanganagh Park. I am satisfied that adequate provision for the tie into these schemes has been made within the proposed scheme where appropriate. I note that the applicant states that the designs of the various projects have been coordinated in relation to surface features including bus stops, cycle track alignments and footpaths for access. Based on the information submitted it is clear that the proposed scheme will tie into and compliment the proposed metro infrastructure. In relation to conflicts with housing development at Woodbrook, I note that the works at this location will not be for a significant duration. It is noted that the applicant intends to continue engagement with various landowners including at Woodbrook, during the construction phases to ensure integration of various projects and to avoid any conflict in their delivery.

9.3.5 Bus Features

9.3.5.1 Bus Stops

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. . Alternative locations for bus infrastructure is also proposed by observers, particularly where it interferes with their property or community area generally.

In relation to the accessibility of bus stops for the mobility impaired it is noted that the applicant states that bus stops have been designed in an accessible manner for this group. The applicant has provided a Accessibility Audit in Appendix I1 and I2 of the Bray to City Centre Preliminary Design Report of the existing environment and proposed design. 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 various disability groups and has incorporated their advice within the design of the scheme.

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. These are 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. 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.

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. 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.

DCC 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. 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.

It is important to note at this juncture that the proposed cycle lane width reductions at these locations whilst have been adequately justified in the interest of pedestrian safety. I note several submissions which raise concerns in relation to the size of the bus islands and consider them 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 islands are acceptable and adequately justified in the context of the overall scheme.

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. The applicant is satisfied that the proposed bus stop will not impede visibility into and out of the adjacent properties. I would not propose to relocate any bus stops and the location in which they are proposed; however, bus stops are located in areas of activity/ access and are more or less evenly spaced in accordance with recommended standards. Relocation of a bus stop may also have knock-on impacts on the location of other stops. Having assessed their location and siting along the overall route, I am satisfied that the placing of bus stops is appropriate and acceptable and will not give rise to significant amenity issues.

Concern is also expressed in some submissions that bus stops may attract anti-social behaviour. On the contrary, I would be of the opinion that the increased

numbers of people using bus services and waiting at bus stops will provide “eyes on the street” type surveillance and this will have the effect of reducing anti-social behaviour.

9.3.5.2 Merge Right to Turn Left

It is noted that left turning vehicles using the bus lane, such as taxis and coaches, are required to merge into the right lane in order to turn left at various junctions. Obviously, private vehicles should not be in the bus lane and remain in the right lane so this does not affect their journey. The merge right to turn left approach is acceptable in order to ensure bus priority through junctions, however, there will undoubtedly be a bedding in period for users to understand the signal controlled priority which will be in place at the junction. However, this comes down to driver behaviour and is a matter for enforcement.

9.3.5.3 Coach laybys

It is noted that the applicant intends to introduce coach laybys in certain locations where there is sufficient space to provide one. These laybys will be used by larger and longer distance coaches who may have longer dwell times. Were they to remain on the main carriage way they would reduce the efficiency of the urban services which have shorter dwell times. I am satisfied they have been implemented where safety or road capacity necessitates it. In certain circumstances, it has resulted in the removal of trees and walls which is acceptable.

9.3.6 Private Vehicle Features

9.3.6.1 Access

Access to both residential, community and commercial premises is a recurring issue within submissions from property owners and occupiers, businesses and other organisations such as schools and churches located along the proposed scheme. The compulsory purchase of land will also affect the operation of certain businesses along the route, and this is addressed in further detail in the accompanying/ concurrent report on the CPO application. This section addresses the issues raised regarding access arrangements during the construction and operational phases of the proposed scheme for deliveries, customers, and staff members.

Clearly a scheme of this nature will cause disruption and inconvenience for adjoining businesses during the construction phase. The road and streets on the corridor is the

main point of access for these businesses. It is noted that the construction phase is likely to last approximately 36 months. The main construction activities will involve site preparation and clearance works, road and street upgrades, and construction site decommissioning, including the removal of all construction facilities and equipment. It will also likely include temporary closure of Circle K in Bray. The impacts will include inter alia temporary traffic diversions or lane restrictions and disruption to footpaths, cycleways, and other areas.

Access will be maintained to adjacent businesses, residences, and community facilities during the construction period. In addition, the Proposed Scheme will be constructed in individual sections. Therefore, businesses within each section will not be directly impacted for the full 36 months of the construction phase. A Construction Environmental Management Plan (CEMP) will be prepared for the Proposed Scheme which will will contain mitigation measures to ensure that disruption minimised.

A Construction Traffic Management Plan (CTMP) forming part of the CEMP will identify opportunities for the maximum movement of people during the construction phase with access being maintained for emergency vehicles. Temporary traffic management measures will be included to minimise the impacts during peak periods and safe routes past works areas will be provided for pedestrians and cyclists. The NTA will liaise with local authorities, An Garda Síochána, residents and businesses prior to all road closures and diversions.

In general, I consider that the construction works can be adequately managed so that significant effects on the street environment are minimised. Impacts on businesses are an inevitable consequence during construction and it is incumbent on the applicant to minimise these impacts to the greatest extent possible. I note that all temporary traffic measures to facilitate the works will be undertaken in accordance with Department of Transport's 'Traffic Signs Manual, Chapter 8 Temporary Traffic Measures and Signs for Roadworks' and associated guidance. Furthermore, general traffic redistribution onto the surrounding road network is not expected to be a significant issue during construction, and emergency access will be maintained for emergency vehicles along the Proposed Scheme throughout the construction phase. This is particularly important given the presence of substantial health facilities (Victoria Eye and Ear Hospital, The Royal Donnybrook Hospital, St Vincents University Hospital, Clonskeagh Hospital, Blackrock Clinic, St John of God Hospital, Stillorgan, National Rehabilitation Hospital, St. Columcille's Hospital, National

Ambulance Service Loughlinstown and other health centres) adjacent to the proposed scheme).

I do note TII's observations in relation the potential interaction between the Proposed Scheme with the national road network at Loughlinstown and Wilford Roundabouts and their associated request for mitigation and agreements for plans and details of works on or in the vicinity of the national road network and the timing of works. I consider this to be a reasonable request and can form part of the details contained within the CEMP and CTMP.

Many commercial business types including supermarkets and food (Donnybrook Fair, P.M. O'Loughlin Foods, The Shankill Market, Bakelicious, Four Star Pizza Bray, SuperValu Bray), wine shop (Terroirs), architectural firms (MOLA Architecture), petrol stations (Circle K Donnybrook and Bray), vehicle services (FastFit/First Stop Donnybrook and Bray), car dealerships (James Hennesy Motors, Windsor Motors Bray), hardware shops (Interlock), tailoring/fashion (Alteration Rooms, MuMu, Bond Brothers), Shanganagh Marble & Stone Centre and Castle Street Shopping Centre among others . state that they have direct access from the lands that the NTA proposes to acquire and are concerned that this may significantly and adversely affect vehicular access to their business. They highlight, given the nature of many of these businesses, vehicular access needs to be maintained at all times. I am satisfied that a CEMP will contain the details required to maintain continued access to this property.

Overall, I am satisfied that any impact during construction will therefore only be temporary, affecting commercial premises along the route for a relatively short period of time.

Objections from businesses along the Proposed Scheme also relate to impacts to access during the operation phase including reduced number of access points to the property, loss of car parking spaces which together will impact their operational capacity. I consider that these matter would form part of the arbitration process with the NTA. The NTA have confirmed that reinstatement of property frontage including boundary walls, gates, railings, driveway, footpath and landscaping will be on a like for like basis and detailed accommodation works plans will be prepared in consultation with landowners. I consider this to be acceptable.

Circle K in Bray contends that the proposed works are excessive in nature and too long in duration and will cause major disruption to their businesses if it will be viable at all as a result of the scheme. They are concerned that the removal of car parking spaces, pumps and the car wash will threaten the survival of the business. They state that all the existing space is needed for the loading and access of vehicles including fuel tankers, unloading of goods, refilling of the underground fuel tank and to allow access and circulation in the premises generally. The impact is accepted by the applicant and fully described and assessed in the EIAR and EIA, respectively. I consider that these matter would form part of the arbitration process with the NTA.

9.3.6.2 Parking

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 relevant EIA section below and will, in the interest of conciseness, not be repeated hereunder. The design of parking will prevent the encroachment onto the cycle lanes and bus lane and therefore protect the reliability and safety of the service.

It is proposed to remove significant levels of car parking in Donnybrook and Castle Street, Bray which are key commercial areas in order to accommodate bus priority and cycle lane infrastructure. It will also upgrade pedestrian facilities. Objections have been received from the occupier/occupier of several of these commercial premises. The NTA responded to these submissions and have outlined that the lands are required due to the restricted road width at these locations. I have reviewed the plans at all these location in detail and note that the carriageway is 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. The third parties are concerned that the proposed loss of parking will impact the viability of their businesses.

However, 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 addition, the discontinuation of cycle lanes to facilitate parking presents an inherent safety risk.

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.

On Morehampton Road (Donnybrook Fair and adjacent shops and Mola Architecture) and at Castle Stret in Bray (Dargle Centre and Castle Street Shopping Centre), it is request that parking outside of its premises be maintained. This is a Core Bus Corridor and main thoroughfare, and car parking should be placed at the bottom of the hierarchy as far as street space allocation is concerned – such is the policy direction set out in Section 6.0 of this report. In my opinion, there is no justification for retaining parking at these location when there is ample parking in surrounding streets.

More generally, it is contended that the current proposal at Morehampton Road and Castle Street lacks loading bays to facilitate the safe delivery of goods to the businesses on the street and that this can be facilitated by the removal of the bike lane in particular. I am satisfied that the NTA developing the design of the Proposed Scheme, has balanced the need to provide parking / loading at local shops / services with the need to achieve the objectives of the Proposed Scheme to provide high quality public transport, cycling and walking facilities through the Proposed Scheme. I am satisfied on the basis of the detailed assessment as set out in the Parking and Loading Report contained in Appendix G of the Preliminary Design Report included in the Supplementary Information, that parking and loading facilities, including disabled parking bays, have been retained in critical areas, such as at the Lesson Street, Morehampton Road, Donnybrook Road, St Anne Church, Dublin Road Bray.

On the whole, I recognise that the streetscape is being substantially altered and businesses and residents along the proposed scheme are amongst those who are likely to the most affected by the proposed scheme. Businesses are critical to street life and must be facilitated as best as possible through construction and operational stages. Notwithstanding this, businesses cannot assume ownership of public space to the front and there is no right to on-street parking. In the case of business where car parking is within its property ownership, the applicant has clearly demonstrated

the requirement for its acquisition in order to meet the community need. This is addressed under the CPO application.

Furthermore, delivery arrangements should be facilitated without impacting on the operation of bus services. In my opinion, adequate loading bays are proposed to serve the CBC and businesses should be expected more often to load from nearby side streets to avoid disruption on the main thoroughfare On balance, whilst businesses and other facilities along the CBC will experience a general reduction of vehicular access for parking and deliveries, this will be outweighed by the benefits to these businesses and facilities from an improved public realm and better footpaths, as well as improved public transport access.

9.3.6.3 Corner Radii

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.

9.3.6.4 Removal of Left Turn Lanes

The proposed removal of left turn/slip lanes at several locations including Beaver Row/Anglesea Road, Booterstown Avenue, Mount Merrion Avenue, Stillorgan Park Road, The Hill Road, Whites Cross, Kill Lane, Clonkeen Road, Johnstown Road, and Corke Abbey Avenue / Old Connaught Avenue is entirely appropriate and generally consistent with the principles in DMURS (Junction Design). It is clear that left turn slips generally provide little extra effective vehicular capacity and are highly disruptive for pedestrians and cyclists.

Many of the observations in this regard are concerned about private vehicle movement and associated traffic delays as result of their removal, which is reasonable. However, this needs to be balanced with safety of walking and cycling movement and increased bus priority. The reduction in general traffic flow through the removal of such lanes has been determined as an overall long-term positive

impact as a result of traffic redistribution following the delivery of the proposed scheme.

I have also considered the removal in the context of larger vehicles including HGVS and indeed buses and coaches. 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 Auto Track Swept path analysis. I am satisfied based on the information provided that the proposed junction modifications will not impede the use of this access by HGVs.

9.3.6.5 Roundabouts

I note submissions, including from Bray Retailers Group, in respect of either the retention or introduction of roundabouts at certain locations, most notably in Section 3 Loughlinstown Roundabout to Bray North (Wilford Roundabout) and Section 4 Bray North (Wilford Roundabout) to Bray South (Fran O'Toole Bridge) of the proposed scheme. While I appreciate roundabouts provide a solution for the flow of vehicular traffic, it is clear having regard to DMURS that they do not provide a safe or convenient options for pedestrians and cyclist. I am satisfied that the approach to junctions throughout the scheme is correct.

9.3.7 Other Features

9.3.7.1 Medium Voltage Substations

A number of interfaces between the existing electricity infrastructure and the Proposed Scheme have been identified, some of which will require diversion of the infrastructure. The proposed relocated MV Substation at the junctions of Dublin Road and Stonebridge Road and M11 Merge/Diverge (Wilford Roundabout) are considered acceptable.

9.4 Adequacy of Consultation

A number of the submissions made to the file are of the view that that the consultation process undertaken by the applicant was not meaningful. It is submitted that the consultation process was deficient and that there were inadequate timescales to make submissions. Another observer was not aware of the different rounds of public consultation. An Observer queries allowing NTA an opportunity for a response / 'second go' to submissions. It is also suggested that all 12 schemes

should have been submitted as one application. I note that a number of concerns are raised within the third-party submissions received in relation to the type and frequency of consultation carried out. Concerns are raised in relation to the timing of the consultation given that it occurred during the COVID pandemic and associated lock downs. There are concerns that the public were not made fully aware of the details of the proposed scheme and were prohibited from engaging with the NTA in relation to the design process. Further concerns are raised in relation to the virtual format utilised by the NTA to undertake consultations as a result of the pandemic and some believe that many people were unable to access the online forum and therefore did not have an opportunity to consider or make representations to the scheme. Reference is also made within a submission to the compliance with the Aarhus Convention.

It is important to consider the adequacy of the consultation undertaken by the NTA in relation to the proposed scheme. I refer the Board to the NTA's response in Section 3.9.3.15 of the May submission to concerns raised in relation to the consultation process above and consider it important to reiterate at this juncture the key points that have been made. It is stated by the applicant that three rounds of consultation were undertaken with a number of methods used including, a dedicated website, brochures social media coverage, advertising and public information events, including in person and the 3rd virtually due to COVID restrictions.

In relation to the statutory process, I note the applicant has erected 176 site notices along the proposed route, advertised the scheme within the relevant newspapers as required and engaged with third parties who have engaged with the process through their submissions to the Board. I am therefore satisfied that the applicant has complied with the requirements of the Aarhus Convention in its relevance to the statutory process and note that such requirements are not relative to any non-statutory consultation which is carried out at the discretion of the applicant.

It is also clear that the residents along the route have been made fully aware of the scheme details and as a result have participated actively in the application process through the many submissions received by the Board which is welcomed.

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.

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.

Overall, I am satisfied that extensive public consultation and stakeholder engagement was undertaken. The applicant has clearly engaged with all third parties, residents, businesses, community groups and other organisations and has amended the scheme accordingly where it has been feasible to do so and in response to concerns raised. I am also satisfied with the level of clarity provided within application and statutory consultation documentation. I am therefore satisfied that the applicant has complied with the requirements of the Aarhus Convention in its relevance to the statutory process and note that such requirements are not relative to any non-statutory consultation which is carried out at the discretion of the applicant. In any case, and in the absence of any specific framework for consultation and engagement, the applicant has met the minimum requirements for same in the context of the planning process.

It is also noted that the NTA intend to continue collaboration in advance of, and during, the subsequent construction stage. Construction works will therefore be carried in consultation with local residents.

9.5 Conclusion

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 relevant development plans 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 where there is a juxtaposition in policy. 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.

The applicant has also provided clear detailed and robust justifications for all aspects of the proposed scheme. I am satisfied that they have 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 and indeed to and from the various commercial, educational and community centres and residential areas found locally along the proposed scheme. I am therefore satisfied that the proposed scheme is in accordance with the proper planning and sustainable development of the area.

It must be acknowledged that a significant number of issues have been raised which I have considered and endeavoured to examine throughout this report. On the other hand, it must also be acknowledged, and as discussed throughout this report, that there is significant challenge in retrofitting sustainable and active travel infrastructure into an existing urban fabric. 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.

Therefore, in overall conclusion of this assessment I am satisfied that the proposed scheme, whilst it does not provide optimal design specifications in all instances, does provide for significantly improved public transport and active travel infrastructure. Optimal designs would have resulted in a greater impact. 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 significantly 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.

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.

10.0 Environmental Impact Assessment

The NTA has submitted to the Board the 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.

The EIAR 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 and AA. The EIAR consists of four volumes:

1. NTS which summarises the EIAR in plainer English.
2. Main Body which considers a range of specific environmental topics in compliance with Article 5 of the EIA Directive and Schedule 6 of the Planning and Development Regulations 2001, as amended.
3. Figures contain mapping/images in relation to the various chapters/topic, and
4. Appendices which contain supplemental information to the main body.

The likely significant direct and indirect effects of the development are considered under the following specific headings, which collectively address the factors set out in Article 3 of the EIA Directive 2014/52/EU:

- Need for the Proposed Scheme
- Reasonable Alternatives
- Proposed Scheme Description
- Construction
- Traffic and Transport
- Air Quality
- Climate
- Noise and Vibration
- Population
- Human Health
- Biodiversity
- Water
- Land, Soils, Geology & Hydrogeology

- Archaeological and Cultural Heritage
- Architectural Heritage
- Landscape (Townscape) & Visual
- Waste & Resources
- Material Assets
- Risk of Major Accidents and/or Disasters
- Cumulative Impacts & Environmental Interactions
- Summary of Mitigation & Monitoring Measures
- Summary of Significant Residual Impacts

The impact of the proposed scheme was assessed under all the relevant topics as set above. Mitigation measures are set out in each chapter. Where further detailed surveys or assessments were required under each topic these have been compiled and are contained in the appendices.

The EIAR sets out a case regarding the need for the development (Chapter 2) and provides detail with regard to the consideration of alternatives (Chapter 3). An overview of the main interactions is provided at Chapter 21. Details of the consultation entered into by the applicant with DCC, DLRCC and WCC 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 reports which are appendices to the Preferred Route Option Report accompanying the planning application.

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 same is addressed in Chapter 20 of the EIAR. potential for ‘flooding’ is considered in Section 13 Water. I consider that the requirement to consider these factors under Article 3(2) is met.

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 completed. 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.

It is important to note at the outset that the proposed scheme under consideration within this application does not cross international boundaries

The documentation prepared by Jacobs Engineering and dated August 2023 is in line with current best practice guidance and allows for a complete examination and identification of any potential significant effects of the development, alone, or in cumulation with other plans and projects. The qualifications and experience of the main author of the report and the authors of specific topics is suitable and relevant. The EIAR and supplementary information provided by the applicant complies with Article 94 of the PDR. The limitation of the EIAR set out in Section 1.8 of the EIAR are noted, however, none are considered material to the assessment or result in a defective assessment which occurs below.

The EIAR concluded that there would be no likely significant adverse impacts post mitigation.

10.1 Consideration of Alternatives

The Consideration of Alternatives is documented within Section 3 of the EIAR submitted. I note that alternatives were considered at three levels:

1. Strategic Alternatives,
2. Route Alternatives, and
3. Design Alternatives.

10.1.1 Strategic Alternatives

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. The applicant considered the development of a light rail service as an alternative to the proposed scheme. This would cater for 3,5000 to 7,000 passengers per hour per direction. However, it was concluded that there would be insufficient demand to justify such a light rail option. The light rail option would also require significantly more land take, necessitating the demolition of properties.

Metro alternative was also considered and as there is a higher capacity requirement for such solutions it was not suitable for this route. In addition, the development of an underground metro would not remove the need for additional infrastructure to serve the residual bus needs of the area covered by the proposed scheme.

Heavy rail alternatives carry in excess of 10,000 people each direction each hour and was considered an unsuitable solution due to major challenges in creating sufficient surface space for such provision.

Certain demand management in the form of restricting car movement or car access through the 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, the applicant has acknowledged that the current public transport system in Dublin does not have the ability to cater for a significant increase in users. The use of demand management would not work in isolation to encourage people to use alternative modes. It is also noted by the applicant that use of electric vehicles will not address the issue of congestion in Dublin. This is in spite of it being an advanced and advancing technology.

If the applicant recommended a Do Nothing approach to the infrastructure on this route, existing issues would be exacerbated including delays to buses and substandard cycling and pedestrian infrastructure. Overall, the shift to active travel and increased accessibility for all road users, including those with mobility and visual impairments would be limited.

10.1.2 Route Alternatives

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 which is set out in two stages is outlined in Section 3.3.1 (Initial High Level) and 3.3.2 (Route Option Assessment) of the EIAR. I note that an extensive ‘spiders web’ of individual links were considered, and a sifting process ensued resulting in the development of several route options. These routes were then considered against environmental considerations as well as other criteria including the economy, integration, accessibility and social inclusion and safety. Route options were compared based on a five-point scale.

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. Each emerging

route was considered in relation to a number of criteria such as economy, safety, integration, accessibility and social inclusion and environment.

Whilst I note that a number of submissions are concerned with the lack of alternatives considered by the applicant, this statement is not substantiated and in the context of the information provided by the applicant I am satisfied that the applicant has carried out an extensive, detailed and robust assessment of all reasonable options for the proposed scheme. I draw the Board's attention to Chapter 3 of the EIAR in which the applicant comprehensively details all alternative considered and the detailed assessment and consideration of the final routes and the emergence of the preferred route.

10.1.2.1 Route Alternatives at Section 3

Given the significant volume of submissions in relation to Section 3 Loughlinstown Roundabout to Bray North (Wilford Roundabout), it is critical that the Board consider the reasonable alternative that may exist at this location. The submissions received by the Board seek a review of the proposed scheme at Section 3 Loughlinstown Roundabout and Bray North (Wilford Roundabout). It is considered by observers, the majority residents of the area, that the scheme through Shankill via the Dublin Road would have adverse impacts on human beings and related topics including traffic and transport, air quality, noise and vibration landscape and visual and architectural heritage.

The concerns primarily relates to an inadvertent increase in congestion and the distribution of traffic in the area. It is also stated within the submissions that the proposed arrangement will result in an increase in pollution within these areas and the delaying of other bus services. Generally, it is the view of the third parties that the scheme provides no real benefits and the improvements suggested by the applicant related to public transport journey times are negated by the wider general traffic impact it would have.

It would also result in an unacceptable level of tree and wall removal and impact to demesne landscapes and change the character of the village and its approaches. Such landscape features and character are supported in DLR policies.

A key component of the argument from observers in relation to Shankill is that the need for bus infrastructure originates in Bray and that the existing infrastructure serves Shankill's population well. The alternatives proposed by the third parties

largely relate to buses using the N11/M11 to access Bray Town via the two roundabouts at Loughlinstown and Wilford.

The Board should note the Transport and Traffic section of the EIA section consider all traffic impacts of the actual scheme. This includes those which relate to routes outside of the application boundaries and those which will accommodate diverted traffic. 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. Many submissions from those in Shankill, such as those from Corbawn Residents Association, query various aspects of the traffic and transport assessment and the predicted modal shifts. I have addressed this in the Traffic and Transport Section of the EIA below – however, in short, I am satisfied with the methodology employed. While many submissions are concerned about the impact to Shankill, it is clear from evidence submitted that in a do-nothing it is likely that traffic congestion would get worse in the absence of the scheme's intervention. In summary, it is anticipated that there will be a 49% reduction in car passengers in the morning peak hour and a corresponding increase of 40% bus passengers and a 108% increase in walking and cycling. I am satisfied based on the information submitted that these roads can adequately cater for the traffic arrangement

Section 3.3.1 of Chapter 3 in Volume 2 of the EIAR discusses the assessment of route options for the Emerging Preferred Route (EPR) at the Feasibility and Route Options stage.

At the start of the process the applicant considered a range of potential routes within a defined study area related to the existing corridor. These were in time refined based on qualitive assessments which looked at criteria such as technical feasibility, existing road conditions and the interaction with other specific objective to enhance bus and cycle facilities along this corridor.

The process resulting in the elimination of several routes due to these criteria. Of note, issues like space constraint or the inability of certain routes to provide a coherent travel network were significant factors in their omission. This resulted in five key routes options, referred to by the applicant as 2A to 2E. These route options were limited to the section between Loughlinstown Roundabout and Bray North.

Given the limited road network at this location several of the options shared overlapping routes.

Route 2B was eventually selected as the emerging preferred route due to its low cost integration with existing public transportation along the route. However, it is noted that it was less favourable overall in terms of environmental criteria comparted to Route 2A (which runs parallel to the N11). I note that most options would require some level of tree and hedgerow removal.

The evaluation between options weighed up the various criteria, including environmental impacts. Other criteria included cost, service level and safety. Ultimately Route 2B was selected as it provide more direct integration of transport and also provide a better service level and safety. While 2A performed well overall, I accept the applicants view that it would not provide for that integration given it is located away from the population centre of Shankill and the M11 currently acts as a motorway.

Section 3.3 of Chapter 3 in Volume 2 of the EIAR details the assessment of reasonable alternatives leading to the finalisation of the Preferred Route Option for the Proposed Scheme, which evolved through several stages:

- Feasibility Studies: Two reports were completed by March 2018, identifying initial route options and a combined Emerging Preferred Route.
- Public Consultation: The first public consultation phase in respect of the Emerging Preferred Route occurred from February to May 2019.
- Revised Preferred Route Development: This revised route including design changes based on feedback received in the first phase of the consultation Revised from based on public feedback and design updates.
- Further Consultation: The second public consultation phase in respect of the Emerging Preferred Route occurred from March to April 2020. Another phase of consultation then occurred from November to December 2020. The Board should that these were affected by COVID19 Restrictions.
- Finalisation: Following incorporation of feedback received during the consultation phases, the preferred Route Option was finalised by the applicant.

All the relevant topics including in the EIAR were considered through the consultation and design phases to ensure that impacts could be avoided where possible. This in particular included the following topics, which required specific consideration:

archaeological and cultural heritage, flora and fauna, soils, hydrology, landscape, noise, air quality, land use, and climate. The relevant competent experts on the various topics worked with the design engineering team to integrate any environmental considerations into the design. This resulted in the minimisation of negative effects.

Overall, I am satisfied that Route 2B, which the DLRCDP recognises as the Core Bus Corridor for the area, is the correct option. Route 2A would have run parallel to the M11 on a newly constructed busway from Loughlinstown Roundabout through to a redesigned Wilford Junction. It would be a significant undertaking in terms of infrastructure in comparison to Route 2B and would result in similar impacts to several residential area (such as the rear of Woodbank, rear of Stonebridge, Stonebridge Close, rear of New Vale Cottages and Mountain View) and potentially expose established residential areas to the motorway with associated noise and air impacts. Overall, any environmental benefit in terms of tree loss may be negated through the creation of other environmental impacts adjacent to the motorway. It would also not serve the transport needs of Shankill Village and newer developments at Shanganagh and Woodbrook due to its remote nature. Furthermore, I note that the DLRCDP has indicatively marked as an objective the Luas Green Line Extension to Bray along the eastern verge of the M11 between the motorway and established area of Shankill. It is clear there is competing use for this space.

The submissions from various third parties in the Shankill area also seeks use of the N11/M11 Bus Priority Interim Scheme (N11/M11 BPIS). This project is being developed as a multi-authority project involving Transport Infrastructure Ireland (TII), the NTA, and local councils. It is led by WCCC. Several submissions propose using the advancing N11/M11 scheme as an alternative to Section 3 Loughlinstown Roundabout to Bray North (Wilford Roundabout), emphasising that Option 2A of the assessment report is the most economically advantageous.

Under Project Ireland 2040 and the National Development Plan 2021-2030 there is an emphasis placed in the importance of protecting and renewing the national road network. This would include increasing the use of public transport on the motorway and national road network. To do this, the roads would be renewed to include for bus lanes. This would enhance efficiency and capacity. TII who also made a submission, raise the issue of their protection more generally. The Board should also note that

the N11/M11 is designated as a regional corridor in the NTA's Transport Strategy for the Greater Dublin Area 2016-2035.

However, the scheme is focused on implementing a continuous bus priority measures during peak periods. It is only in the option selection phase and is evaluation how a bus lane might be integrated into a motorway/dual carriageway. The overriding objective of the N11/M11 BPIS is to develop a proposal for the provision of bus priority measures on the N11/M11 national road to facilitate longer distance buses and coaches in avoiding traffic congestion.

Currently, the N11/M11 BPIS is assessing the feasibility of dedicated bus lanes along the N11/M11 route, from the Loughlinstown roundabout in the north to N11 Junction 9 in the south. Follow a detailed evaluation, the best locations for the lanes within the existing roadway, any necessary road widening, and the extent of bus lane implementation can be decided by WCCC .

It is important to note that the objectives of the N11/M11 BPIS differ from those of the Bray BusConnects Scheme. In particular the Board should consider the design requirements of both projects - the N11/M11 BPIS will not include bus stops between Loughlinstown roundabout and Bray. This means it would not address local travel needs in Shankill. However, the N11/M11 BPIS is included in the traffic modelling for the Proposed Scheme and is consequently part of the EIAR and Traffic Impact Assessment (TIA). I am satisfied that the goals of the N11/M11 BPIS do not align with those of the Proposed Scheme, and therefore, I am satisfied that it is not a viable alternative for Section 3 (from Loughlinstown Roundabout to Bray North) of the Proposed Scheme on this basis.

I note Mr Brendan Heneghan raised the similarities of how Shankill Village and Chapelizod Village (in the Lucan BusConnects) was treated. In the Lucan BusConnects, the scheme follows the N4 Dual Carriageway and provides an accessible bus stop on the mainline dual carriageway. The scheme does not go through Chapelizod Village. While I note the design, in practical terms, the same design could not be introduced for Shankill given the M11/N11 is a motorway at this location and the introduction of bus stops on the motorway would give rise to safety concerns and require infrastructure to provide access for pedestrians. The distances from the main residential areas are again, not similar. In addition, the N4 is not a

motorway and a QBC in which bus infrastructure is already in existence and only being improved.

Several third parties also raise concern about the cost benefit of the proposed scheme, particularly in the context of N11/M11 BPIS also in development concurrently. The Board should refer to Section 3.9.3.2 of the EIAR for the cost benefit analysis. It should be noted that all major publicly funded infrastructure projects are required to comply with the Public Spending Code.

The Preliminary Business Case (PBC) for BusConnects, approved by the NTA Board, outlines the key costs and benefits and has been submitted for further review by the Department of Transport and the Department of Public Expenditure and Reform. In March 2022, the government granted Approval in Principle to the NTA to move forward with statutory consent applications and the tender process for the Next Generation Ticketing.

Following the PBC, the next steps are the required approvals for BusConnects which includes the planning application before the Board. I note that the NTA is satisfied the cost-benefit analysing has been carried out in accordance with Public Spending Code Guidelines.

The observers are of the view that the proposed scheme as it is currently presented results in unreasonable and avoidable impacts to Shankill and its environs - it is an inefficient use of resource and indirectly impacts the existing bus service. The observers provides several documents indicating the issues of same, including a document from a Transport consultant. While these documents are noted, none provide the comprehensive level of evidence that is put forward by the applicant which is holistic in its approach to mobility planning in the greater Dublin area and supported by a range of different policies at a national, regional and local level. .

Overall, I am satisfied that the applicant's EIAR and TIA is sufficiently robust to facilitate the Board in making an evidenced approach. I would also be critical of the singular view taken in such reports by traffic consultants which fail to consider the aims and objectives of this scheme to facility bus priority and pedestrian and cycling facilities. When this is factored in there will be a reduction in general traffic flow which will have a an overall potential Positive, Slight to Profound Long-Term impact on the direct study area. I am satisfied that the Proposed Scheme will not have any negative impact on traffic congestion in Shankill.

Overall, I am satisfied that the applicant fully considered the reasonable alternatives for the Section 3 Loughlinstown Roundabout to Bray North (Wilford Roundabout). Both Option 2A, which would see an offline bus lane parallel to the N11 installed and use of the N11/M11 itself through the BPIS were considered in full. Ultimately, this is a sustainable transport infrastructure scheme and I accept the applicant view that it needs to be located in and serve the widest community it can. In this instance it requires the use of the main artery through Shankill which is central to residential and commercial areas. Using routes closer to the N11 would not do that, given the location of and access to key population centres along the Dublin Road at Shankill. The Board should also be clear that N11/M11 BPIS does not negate the need for BusConnects or vice versa. It is not simply one or the other, both are likely required to meet the different transport needs of the GDA and achieve related climate targets set out in CAP24.

While the observer do not want Shankill to become a ‘corridor’ for interurban traffic between Bray and Dublin City Centre, it is important to note that the proposed scheme also serves local trips, for example from Shankill to Bray and Shankill to local hospitals, schools and community centres. It is does more than serve Bray to Dublin City Centre. I consider the overall environmental, social and economic concerns of observers to be overstated and the changes being proposed are restrained, proportional and have been fully assessed. Several parts of this section, including Shankill Village itself, will see no material change to its current layout. However, in terms of traffic and transport, the ‘Do Nothing’ scenario means there would be no changes to existing transport infrastructure, so infrastructure provision for buses, pedestrians and cyclists would remain the same. The streetscape would continue to be based around the movement and parking requirements of private cars instead of people. High levels of traffic are associated with discouraging pedestrian and cyclist activity and this activity would be further discouraged as traffic congestion remains the same or increases. The baseline situation of congestion and journey time reliability issues for buses would also continue, and potentially be exacerbated over time as traffic congestion increases in line with travel demand growth.

As detailed in the traffic and transportation section below, I am satisfied that the applicant has robustly examined the potential for impacts to arise in relation to the proposed corridor and indeed the surrounding road network. Any changes will not give rise to any significant effects. It is stated by the applicant that the proposed

arrangement is necessary to ensure that a reliable and faster bus service can be achieved between Loughlinstown and Wilford roundabouts. 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.

While extensive concerns have been raised by the local community in relation to the movement of traffic at in Shankill. The applicant has provided a detailed response to these queries as to how traffic will move and access various locations. I will not repeat this response and direct the Board to Section 3.9 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.

In addition, I am satisfied that the applicant has fully considered reasonable alternatives within Route 2B itself. The typical section which would include lanes for general traffic, public transport and bicycles in both directions was not applied in most cases and the applicant considered different alternatives to ensure the objectives of the scheme was met. The consideration of alternative designs was largely based on avoidance of sensitive features in so far as possible by not including certain infrastructure in certain locations. This includes a shared space for buses and cyclists on the Dublin Road for example to avoid potential impacts on properties north of Stonebridge Road, a shared space for all modes on the inbound section between Stonebridge Road and St Annes Church and shared space in both directions through Shankill Village. Many alternatives are also suggested by observers in terms of which side of the carriageway infrastructure should be located. Typically, where an observer is impacted by the proposed scheme, it is queried why the other side of the carriageway was not chosen to provide infrastructure. I am satisfied there has been careful design consideration given to which side of the

carriage way should host the infrastructure which was based on an extensive consideration of the constraints and the requirement to provide a legible scheme.

10.1.3 Conclusion

It is considered that the EIAR has adequately addressed reasonable alternatives, in particular the reasonable alternative routes available in the area.

10.2 Assessment of Topics

Each topic is considered individually in subsequent sections in the following format

- Introduction
- Existing Environment
- Potential Effects
- Mitigation Measures
- Residual Impacts
- Cumulative Impacts
- Other Issues Arising from Observations
- Conclusion

Unless otherwise stated below, the methodology and the approach to each topic is considered appropriate. This assessment relies on the EIAR submitted and addresses key issues, impacts and mitigations of thew proposed scheme.

10.2.1 Traffic and Transport

10.2.1.1 Introduction

Chapter 6 of the EIAR identifies, describes and assesses the potential direct and indirect impacts of the proposed scheme on traffic and transport during its construction and operation phases. This topic has numerous interactions with other chapters of the EIAR which are addressed in separate sections of this assessment.

10.2.1.2 Methodology

The Board should note that this assessment has considered and relied on supporting documents in the EIAR including a TIA. Additionally, at the outset the Board should be reminded that the aims and objectives of the proposed scheme are based on prioritising the movement of people, rather than motor vehicles only. The prioritisation has broad policy support, as set out in Section 6.0 of this report. In

short, public transport, walking and cycling are more efficient that vehicles in most traffic and transport scenarios.

I have considered Section 6.2 of the EIAR which sets out the methodology for the traffic and transport assessment and consider it a reasonable approach using TII's (2014) Traffic and Transport Assessment Guidelines. These guidelines are commonly used in development management in Ireland and can provide the appropriate description for the likely potential impacts.

I have also considered the transport model development process, the traffic data inputs used, the calibration, validation and forecast model development which are found in the appendices. Again, these are methodical, empirical and overall, acceptable. Of course, modelling is a complex task, however, the Board should be satisfied in the competency of the individuals who prepared the information - all hold relevant qualifications and experience.

A number of issues have been raised in relation to the modelling on which the Proposed Scheme is predicated on, particular in Section 3 Loughlinstown Roundabout to Bray North (Wilford Roundabout). I note the submission of Transport Analysis and Advocacy Ltd. on behalf of Shankill Community Action, Nigel Kenning and Prof. Patrick J Davey which challenges many aspects of the report but forward by the competent experts of the NTA.

I draw the Board's attention to Appendix A6.2 Transport Modelling in which the applicant's approach to transport modelling for the proposed route is outlined. I note that four models were developed to work together to develop the Proposed Scheme. The Models used are also used at a national and regional level and are a known in terms of their reliability. The applicant utilised local area data for the local model and also utilised micro simulation models to assist in the operational validation of the scheme designs and to provide visualisation of scheme operability along with its impacts and benefits. The design of the scheme was an iterative process and responded to constraints and requirements that were added to the models over time. Models were calibrated to account for the difference between modelled and observed traffic flows which improved the accuracy of the outcomes of the proposed route. The proposed route was modelled for vehicle type, speed changes, junction layouts and crossing facilities. All results were refined and altered to produce the preferred route and associated junctions and signalling.

On balance, considering the NTA's submission of May 2024 and the submission of Shankill Community Action, I am satisfied that the applicant has provided robust forecast of travel demand. This has been coupled with the requirements of DMURS and the National Cycle Manual to create the most suitable route within the constraints that exist along it. The assessment has also factored in changes to the baseline environment since COVID-19 and working from home practices have become more common. I am satisfied that applicant has made the appropriate case for not proceeding with the N11/M11 BPIS and that on the whole, the level of works needed in Shankill is minimal and proportionate and that the do-minimum scenarios is not sufficient in a wider common good context and for the benefit of all users and modes along the entire scheme. The environmental impact is acceptable also. Simply put, there is little point putting a CBC on or parallel to the N11/M11 where access to same would be remote and difficult to access for the local population.

I am satisfied that the Proposed Scheme will provide improved mobility at Section 3 Loughlinstown Roundabout to Bray North (Wilford Roundabout) and that the applicant has utilised a detailed, robust and multi-faceted modelling approach to develop the Proposed Scheme.

10.2.1.3 Existing Environment

The baseline conditions are categorised into four sections: Leeson Street to Donnybrook (Anglesea Road Junction) Donnybrook (Anglesea Road Junction) to Loughlinstown Roundabout Loughlinstown Roundabout to Bray North (Wilford Roundabout) Bray North (Wilford Roundabout) to Bray South (Fran O'Toole Bridge). For brevity, it is not intended to repeat or summarise these. However, in relevant sections of the EIAR the Board will find detailed information on pedestrian infrastructure such as crossings, cycling infrastructure including details on existing lanes and shared facilities, bicycle parking, bus infrastructure including bus priority measures, stops, frequency. Finally general traffic is described. including junctions, parking and loading.

10.2.1.4 Potential Impacts

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 modes, 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

In relation to the full proposed scheme, I note that two construction compounds are proposed and the scheme will employ 150-200 staff, rising to 280 staff at peak construction. The haulage of materials is expected to be minimal with the daily projected number stated as a maximum of 34 (40% of the peak total of 86) two-way HGV movements are expected in a typical hour during peak haulage activity.

Haul routes will largely come from the motorway network which is in close proximity to the proposed site. The applicant has examined routes from the M50 Junction 14 to M11 Junction 5. There junctions are all connected to the regionally classified road network.

It should be noted from the outset also that the works are programmed to take place over a period of thirty six months. However, in certain locations works would be completed in a considerably shorter period. This would depend on the scale of the works required at the different locations.

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 scheme.

All road closures and diversions that a required will need to be determined by the NTA following detailed design. The NTA will liaise with the local authority and An Garda Síochána, as necessary. The applicants have acknowledged that there is need, temporarily, to restrict access to private property may require from time to time. The applicant is committed to maintain access at all times but where it is required, they will be confirmed with the owner or occupier prior to it being implemented. These are localised issues and it is difficult to schedule these local closures in the context of a planning application. Impacts in relation to access are not stated to be significant or long term.

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.

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.

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.

Overall, the magnitude of impacts associated with the construction of the proposed scheme will be Negative, Slight to Moderate and Temporary in nature.

Operation

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 6.16 and 6.19 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.

In relation to parking the applicant has clearly outlined the number of spaces to be lost at each location 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 DCC 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 and business have also raised concerns within observations in relation to the loss of parking on street and request pay and display and residents/staff only solutions. It is important to note in this regard that no significant effects are expected to arise in relation to parking, specifically in Section 1 at Donnybrook and Section 4 at Castle Street where a higher level of parking is being removed relative to the rest of the scheme. The applicant has demonstrated that adequate car parking has been retained at on-street locations.

Pedestrian Infrastructure

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. Where standards cannot be achieved, largely as a result of spatial constraints, the applicant has justified the reason for same.

Cycle Infrastructure

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 significantly enhanced experience for cyclists over that currently available. I am satisfied that the applicants have examined the potential for impacts to arise in relation to the proposed cycle infrastructure and have examined all reasonable alternatives in this regard also.

Bus Infrastructure

It is proposed that there will be a total of 124 bus stops along the entire length of the scheme which will be an overall increase of 26 bus stops. The increase is primarily seen in Section 2, which is the also the longest section, which sees an increase of 20 bus 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.

Based on the information submitted and the NTA responses to the concerns raised as outlined within the assessment section of this report, I am satisfied that the applicant has adequately justified the proposed alterations to bus stops. I also note that all bus stops will have accessible kerbs and real time information and the majority will also have shelters which is currently not the case at all stops. Overall, the accessibility and reliability of the bus service will be significantly improved to that available currently. Such improvements will have a positive and long-term impact for patrons and will not result in any significant negative effects.

Parking

As mentioned above, significant concerns have been raised by third parties in relation to the removal of on car parking along the route of the proposed scheme.

The proposed scheme will affect existing car parking and loading arrangements in Section 1 of the proposed scheme. The key changes include the removal of 17 taxi spaces on Leeson Street. This is because of the design of the bus and cycle tracks. To mitigate this loss addition taxi parking is being proposed on Hatch Street. This is generally considered acceptable and would result in a negative slight and long term impact. On Sussex Road also, four taxi spaces will be removed to facilitate a coach stop. While taxi spaces will remain, it is still considered to be a negative, slight and long term impact to taxi operations.

The scheme proposed to remove six loading bays on Leeson Street and Sussex Road. This is to facilitate revised lane arrangement. The applicant has assessed this impacts as being negative moderate and long term. Conversely, It is noted that additional permit parking is being created on Leeson Street Upper to minimise losses as a result of the proposed scheme.

There is significant opposition to the removal of parking on Morehampton Road. All 20 designated paid parking spaces will be removed to facilitate the proposed scheme. This is the area at Donnybrook Fair and Terroirs. The applicant accepts that this would be a negative moderate and long term impact. The impact is somewhat minimised by parking on adjoining streets, off the main corridor. Up to four car parking spaces will also be removed. The disabled parking space is being relocated to a side street on Herbert Park Road which is approximately 140m away from its

current location. This is acceptable. A formal loading bay on Morehampton Road near the junction of Herbert Park will be created and reduce existing capacity by one. It will be time plated to ensure availability. This will be a negligible impact.

On Donnybrook Road 14 of the existing 35 designated paid parking spaces are going to be removed to facilitate the proposed scheme. Two loading bays will also be removed. There is currently 5 such spaces. The removal of parking also includes private parking at Mola and FastFit, both of whom have made submissions. However, it is expected that the impacts will be negative, moderate and long term. The impact is somewhat minimised by parking on adjoining streets and on the main corridor.

The proposed interchange at UCD will result in a significant volume of parking, up to 67 spaces. Given the availability of parking across the UCD campus this is consider negative, slight and long term impact.

St Annes Church in Shankill has approximately 82 informal parking spaces. There is land take to the west of the site which would see an impact to the current parking arrangement. However, the applicant expects to maintain the total number of car parking through a redesign of the parking layout. On this basis, the applicant is stated that the impacts will be negligible.

In Section 4 of the proposed scheme, at Bray, there will be impacts to parking also. This includes removal of parking at Windsor Motors (loss of 6 over an existing 59). This parking is used for commercial car sales. This would leave 53 spaces available for car sales and customer parking. This adjustment would negative but slight in the context of traffic and transport given their use for commercial purposes. Similarly, Fitzpatrick Motors (Bray) Limited now Bright Motor Group and part of the Circle K complex has 17 spaces used for commercial purposes. 8 spaces will be removed. This will leave 9 spaces and have moderate impact overall.

On the AXA site, there is 12 car parking spaces. Due to the land take at this location, 5 spaces will be removed leaving 7 spaces. These changes are also considered moderate. At the Castle Street Shopping Centre, a reconfiguration is required to due to the land take at that location. It is expected that 13 spaces will be lost out of 132 spaces. This is considered slight in the context of the spaces available.

At the Dargle Centre, where many of the occupants have made submissions are concerned about the loss of parking. It is noted that there will be a loss of 4 spaces

from a current number of 15. This is considered more moderate an impact in the context of the existing spaces available and its proximity to other parking spaces. The applicant intends to reconfiguration the car park works at this location.

In terms of positive impacts. There are currently two designated loading / unloading bay located adjacent to the Castle Street northbound carriageway It is proposed to provide four additional loading / unloading spaces.

The proposed scheme will result in the elimination of 224 spaces across all sections with impacts ranging from negligible to moderate with the majority of losses in Section 1 at Donnybrook with the loss of 92 spaces and Section 4 Bray with the loss of 46 spaces. The overall impacts should also be considered in the context of the proposed schemes purpose and objectives to enhance accessibility by walking, cycling and bus use and assist in a modal shift away from private vehicles.

For the benefit of the Board, an overview of parking impacts along the route will see a reduction of approximately 224 spaces out of an existing 2275 currently available (~ 10%). However, given the availability of parking in adjacent streets the overall impact is not considered as being significant. This is particularly the case in Donnybrook at Donnybrook Fair, Mola Architecture and opposite Donnybrook Stadium and similarly in Castle Street, Bray at the Dargle Centre and Castle Street Shopping Centre. The board should note at this juncture that the removal of parking at locations, such as have been the subject of strong objection from third parties in respect of these locations 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.

The Proposed Scheme will formalise the parking arrangements at certain locations and will improve the street environment, particularly for pedestrians and cyclists and enable a significantly 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 ‘Negligible-Negative, Moderate and Long-term’ effect. I am satisfied that no significant effects arise in this regard.

People Movement

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 108%. Private car use for the same year is predicted to decrease by 49%. The PM peak for the same year is predicted to have a similar modal shift with 67% of people walking/cycling outbound, and a 47% reduction in the private car. Modelled modal shifts for the year 2043 also see a significant increase in people walking and cycling with a 211% increase in the AM peak hour and an 125% increase in the PM peak hour.

There is also a greater uptake of public transport with an additional 40% passengers in the am peak hour of 2028 and an additional 60% for the same peak hour in the 2043 year. PM hours also see increases with an increase of 17% in 2028 and 2043. 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.

The overall magnitude of the forgoing modelled changes is positive, significant and long term. It is clear from the information provided by the applicant that the proposed scheme will be a significant intervention in the environment that will assist in the reduction of GHG in Dublin City. Once operational it will have a significantly positive impact on the sustainability of the city.

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.

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

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).

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 6.58 and will see traffic reductions vary between a slight -103 and a profound -1251 combined flows along the surrounding road links. The magnitude of effects to these roads, which will experience a reduction in traffic, is therefore positive.

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 6.59 of the EIAR. It is stated that the increase in traffic on these roads will increase by between +101 and +506 combined flows during the AM Peak Hour.

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.

The Board should note that national roads will not experience more than a 2% (M50 J16) increase to traffic and as the threshold to trigger a detailed assessment of these routes is a 5% increase, no further assessment is required.

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. The results of the assessment demonstrate that the surrounding road network has the capacity to accommodate the redistributed general traffic as a result

of the Proposed Scheme. The majority of assessed junctions that required further traffic analysis have V / C ratios that are broadly similar before and after the Proposed Scheme implementation

I am satisfied that the concerns of TII has been addressed in the EIA and the national road network's safety, capacity, and the strategic functions will not be adversely impacted, particularly at the Wilford Roundabout and Loughlinstown Roundabout. The proposed scheme is consistent with relevant planning policies and specifically the relevant TII Publications. TII in its submission has been explicit in the need for the applicant to liaise with them on any interactions that occur with the national road network including by its contractors which may be employed during all phases of the development. It is also requesting monitoring plans during the consultation phase to ensure the national road network continues to function correctly. TII seek to be a primary consultee on the CEMP also. In the event of Board approval, TII recommends specific mitigation measures to safeguard the safety and efficiency of the national road network, highlighting the need for thorough evaluations and consultations throughout the process. There are conditions recommend below, to this extent, should the board be minded to grant planning permission.

In summary, the evaluation has concluded that the decrease in overall traffic flows resulting from the Proposed Scheme will have a Positive, Significant, and Long-term impact. In contrast, the redistribution of general traffic across the surrounding road network will lead to a Negative, Moderate, and Long-term effect. Therefore, there will be no significant decline in the overall traffic conditions within the study area as a result of achieving the scheme's goals of improving priority for sustainable transport options in the immediate area. 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.

10.2.1.5 Mitigation Measures

There a range of mitigation measures proposed to minimise the construction impacts on all modes of transport including the CEMP included in Appendix A5.1 of the EIAR. This will be updated with any conditions required by the Board. In addition, there will be a Construction Traffic Management Plan (CTMP) that can manage movement at

peak traffic times. I note the applicant has also outlined a Construction Stage Mobility Management Plan to promote active travel among staff. I am satisfied based on the nature of the works no other mitigations are necessary once the proposed scheme is managed in the context of TII guidance and best practice standards. A condition should be attached to the granting of any planning permission to ensure the CEMP is agreed with the planning authority and any other relevant authority like TII.

10.2.1.6 Residual Impacts

I am satisfied that when the mitigation measures are implemented, no significant residual impacts will arise.

10.2.1.7 Cumulative Impacts

On a wider programmatic scale, the applicant is proposing to limit the number of BusConnects schemes to be developed at any one time. I am satisfied this will reduce the significance of the impacts further and ensure any traffic that is redistributed is not further impacted elsewhere.

The traffic flows on the site and on the surrounding road network is expected to be maintained at all times given it is a primary route in and out of the city. Any lane closures may create impacts elsewhere. However, I note access to properties will be maintained in so far as possible and the CTMP and CEMP can be updated to manage any local issues as they arise.

The DART+ Coastal South Project is noted as by the applicant as being in an early options select process. I also note the timeframe and differing nature of the works for that project and am satisfied it is unlikely that both would occur together. In the scenario that it would, it is noted both parties can liaise with one and other to manage any cumulative impacts collectively through the updated CEMP and CTMP.

During operation, impacts could arise due to the schemes implementation and indeed the wider BusConnects programme. However, I am satisfied in the applicant's modelling and that there is coordination between the projects in the programme such that they critical junctions and displacement of traffic can be managed. I do note however that the applicant is relying on the assumption that the scheme should bring about a modal shift that alleviates some of the cumulative traffic impacts in any case. While no significant cumulative operational impacts are expected -any such cumulative traffic impact that does arise should be considered acceptable by the

Board if there is to be a meaningful modal shift. Otherwise, traffic becomes worse in any case in the do nothing scenarios.

10.2.1.8 Other Issues Raised

I note the comments regarding the request for camera enforcement in bus lanes, at bus priority signals, at bus gates, and for turning restrictions. While enforcement of proper bus lane use is currently the responsibility of An Garda Síochána, the NTA is investigating various proposals and methods for enforcing bus lanes, as outlined in Measure INT20 – Enforcement of Road Traffic Laws of the Greater Dublin Area Transport Strategy 2022-2042. Additionally, it is noted that specific measures, such as advanced bus signal detection systems that will trigger green signals at traffic lights exclusively for authorised vehicles have been included in the Proposed Scheme to discourage improper and illegal use of bus lanes.

The other measures suggested by observers in respect of efficiencies in bus operations, including increasing the number and frequency of buses, reducing dwell times, removing driver changeover in Donnybrook, making fare payment more efficient, enforcement of bus lane use, bus lane operating hours are noted. It is noted that these measures are being pursued in addition to the proposed scheme – it is not one or the other – both are required as the bus services seeks to improve. It is also noted that these measures do not resolve safety concerns regarding pedestrian and cyclists. Pedestrian and cycle safety is a key objective of the proposed scheme.

I am satisfied speed limits have been appropriately considered under the Stage 1 Road Safety Audits and are appropriate.

In addition, I am satisfied based on the information submitted that the traffic and transport impacts from the proposed scheme to residential, community and commercial areas are acceptable including at Deansgrange Village, in the context of recently opened Deansgrange Cycle Route Scheme, Foxrock Church and to the east of Shankill Village including access to the rail line and tennis club is acceptable.

10.2.1.9 Conclusion

It is considered that the corresponding section of the EIAR has adequately identified, described and assessed the direct and indirect effects of the proposed scheme in respect of this topic and in accordance with the requirements of the EIA Directive.

It is considered that the proposed scheme, on the basis of information submitted and submission received on the file, and subject to mitigation and monitoring measures, would not be likely to have significant effects on traffic and transport.

10.2.2 Air Quality

10.2.2.1 Introduction

Chapter 7 of the EIAR identifies, describes and assesses the potential direct and indirect impacts of the proposed scheme on air quality during its construction and operation phases. This topic has numerous interactions with other chapters of the EIAR which are addressed in separate sections of this assessment.

10.2.2.2 Existing Environment

Several sources were examined to understand the baseline environment for air quality in including desk based sources and a site-specific monitoring programme. The applicant used the TII Air Quality Guidelines and any relevant data that was available from the EPA also. Particular attention is given to the nitrogen dioxide (NO2) and the exceedance in areas where motor travel is high such as in Dublin City Centre and along the M50. Air Quality was also considered in the context of ecology with the relevant sources from the NPWS being considered.

The site specific monitoring was undertaken from November 2019 to June 2020 at twelve location using diffusion tube sampling. All this data is presented in full in the EIAR. It is noted that exceedances of NO2 concentration was recorded at Lesson Street and Morehampton Road monitoring location.

10.2.2.3 Potential Effects

The key pollutants considered relevant to the proposed scheme are identified as: Nitrogen Dioxide; Dust; Particulate Matter PM10 and PM 2.5; and greenhouse gases; Carbon Dioxide (CO2), Sulphur Hexafluoride (SF6).

The impacts evaluated for the Construction Phase include dust emissions resulting from activities such as site clearance and preparation, utility diversions, road and junction construction, and landscaping. These impacts are standard construction nuisances, common to any construction scheme, and can be controlled as part of the standard and best practice construction measures. Additionally, the air quality impacts related to traffic during the Construction Phase and alterations in traffic flows have been assessed. It is noted that there would be between five and ten heavy

earth moving vehicles in use at any one time during peak construction activities. A total of 14 public roads have been identified as required construction access routes along which construction traffic will be permitted to travel. However, 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. The findings indicate that emissions from construction-related traffic will have an overall Neutral and Short-Term effect across the study area. The evaluation of potential air quality impacts from Construction Phase activities suggests that the impacts will be temporary. The effect on air quality is expected to be insignificant overall following the implementation of the proposed mitigation measures as set out by the applicant.

For the Operational Phase, the assessed impacts include potential air quality changes due to alterations in traffic flows along the Proposed Scheme and realigned traffic lanes. No mitigation measures will be necessary during the Operational Phase, as all ambient air pollutant levels are expected to meet air quality standards. The assessment indicates a generally Neutral impact on air quality resulting from the Operational Phase of the Proposed Scheme. The ecological impacts associated with the Operational Phase traffic emissions will overall be Negative, Slight and Long-term.

The concern of observers of an impact to air quality due to the removal of trees and, in certain instance, the closer proximity of traffic lanes to properties is noted. Whilst this concerns is acknowledged, 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 scheme 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. It is also noted that the proposed scheme includes, by design, additional vegetation planting to compensate for the trees removed.

10.2.2.4 Mitigation Measures

I consider that any impacts would be acceptable subject to the mitigation and monitoring measures set out by the applicant which will result in a reasonable possibility of effectively reducing their significance.

The impacts at construction phase will generally be temporary and short-term and would be controlled as part of the standard and best practice construction measures as well as specific mitigation measures set out in the EIAR.

There is no bespoke or extraordinary mitigations measures of note proposed.

10.2.2.5 Residual Impacts

In the 2028 forecasts, the operation phase will result in localised moderate adverse effects on human receptors on Baggot Street Upper and Mespil Road. This is due to the NO2 concentrations exceeding the relevant limits. However, the Board should note that NO2 the existing baseline NO2 levels that are already quite high. The applicant notes advancement of electric vehicle technologies which should see a reduction in NO2 to slight adverse or negligible levels by 2043.

10.2.2.6 Cumulative Impacts

The impacts arising from traffic displacement is largely related to air quality impacts. However, overall, these are expected to be negligible over the baseline environment. The standard mitigation measures for dust will ensure any construction phase impacts will be negligible.

10.2.2.7 Conclusion

I am satisfied that that the corresponding section of the EIAR has adequately identified, described and assessed the direct and indirect effects of the proposed scheme in respect of this topic and in accordance with the requirements of the EIA Directive.

I am satisfied that the proposed scheme would not be likely to have significant effects on air quality. This is on the basis of information submitted and submissions received on the file, and subject to mitigation and monitoring measures.

10.2.3 Climate

10.2.3.1 Introduction

Chapter 8 of the EIAR identifies, describes and assesses the potential direct and indirect impacts of the proposed scheme on climate during its construction and operation phases. This topic has numerous interactions with other chapters of the EIAR which are addressed in separate sections of this assessment.

10.2.3.2 Existing Environment

In order the established the baseline environment, the EIAR considers greenhouse gas emissions and examination of relevant guidelines The implementation of the BusConnects Programme is an inherently a climate mitigation or adaption measure in of itself and is well supported irrelevant government policy including CAP24 as outlined previously. The baseline also factors in the effects of climate change.

10.2.3.3 Potential Effects

In terms of the construction phase, the potential effects are related to typical construction activities including site clearance, utility diversions, excavations and landscaping. There are additional impacts from construction traffic through exhausts and it is a primary source of greenhouse gas emissions for the proposed development. Embodied carbon associated with the materials used in the projects also generate an impact.

The proposed scheme will generate approximately 15,652 tonnes of Embodied CO2 equivalent. This calculation is based on a 36-month construction phase. This represents approximately 0.014% of Ireland's non-emissions trading scheme target for 2020 and 0.087% of the ceiling for 2030. The applicant consider this a Short-Term, Negative, Minor residual impact On the basis of the implementation measures outlined in various other topics of the EIAR.

At operation phase there is not expected increase in greenhouse gas emission given the road is not expanding as such. GHG emissions related to traffic will have a negative minor permanent impact due to the CO2eq levels fluctuating between ±0.01% and ±0.5% of the Transport Emissions Ceiling. The applicant equates this to 9,300 car trips on a weekday in the 2028 forecast and 7,140 trips in 2043. The decrease between years is a result of the expected modal shift and usage of other modes of transportation. The applicant estimates that this equates to the elimination of 6,030 to 9,140 car trips per weekday in 2028 and 2043. I t is noted that haulage and heave good road freight in unlikely to change and the proposed scheme is not intended to bring about change in this subsector of transport.

The proposed development is consistent with the Climate Act 2021. Indeed, as previously outlined BusConnects is identified as a clear measure for climate action the CAP24 and is expected to resulted in a higher demand and shift toward for public transport, cycling and walking.

There is a significant number of third parties concerned about the loss of trees and they also raise the fact that their removal will result in the negatively on the ability of sequester carbon. It is noted that approximately 410 tress will be removed as part of the proposed scheme. While the concern is acknowledged, the information provided in this regard is clear and robust and I am satisfied based on the information provided that no significant impact will result int terms of climate and indeed air quality. I noted that there a measures for additional planting along the route which would minimise any impact further.

10.2.3.4 Mitigation Measures

I am satisfied that any impacts would be acceptable subject to the mitigation and monitoring measures set out which will result in a reasonable possibility of effectively reducing their significance.

The impacts at construction phase will generally be temporary and short-term and would be controlled as part of the standard and best practice construction measures as well as specific mitigation measures set out in the EIAR.

It is noted that applicant commits to measure including 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.

There is no bespoke or extraordinary mitigations measures of note proposed.

10.2.3.5 Residual Impacts

I am satisfied that that there will be no significant residual effect as a result of the proposed scheme on the basis of the mitigation measures being implemented.

10.2.3.6 Cumulative Impacts

The assessment of embodied carbon emissions for the proposed scheme was considered by the applicant in the national context along with other concurrent projects. The cumulative embodied carbon from the Dublin BusConnects programme calculates that 88% is from construction material and the remained from pre-construction activities and waste. It is expected that the scheme will generate 112.2 kilotons of embodies CO2 equivalent. This is 0.05% to 0.06% of Ireland's non-ETS emission targets for 2020 and 2030.The construction phase emissions is expected to have minor adverse impact on climate. Traffic emissions during construction are considered to be a minor adverse impact, amounting to 0.011% of the 2020 target

and 0.07% of the 2030 ceiling. To mitigate impacts, lower emission concrete will be used to reduce CO2 however the applicant cannot eliminate impacts in this regard due to the scale of the programme and the impacts are considered Negative, minor and short-term. The operational phase emissions largely emanate from road pavement maintenance materials and are considered negligible.

The BusConnects programme in cumulation will see decreases in CO2 emissions over time, with increase reductions coming over time over the do minimum baseline. This calculation is based on electrification of transport fleet. The climate impact of the proposed schemes during 2028 forecast is considered positive minor and permanent.

10.2.3.7 Conclusion

It is considered that the corresponding section of the EIAR has adequately identified, described and assessed the direct and indirect effects of the proposed scheme in respect of this topic and in accordance with the requirements of the EIA Directive.

Having 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 it is clear that the proposed scheme will have a positive impact on achieving the overall reduction required for Ireland. The proposed scheme is consistent with the Climate Action and Low Carbon Development (Amendment) Act 2021.

I am satisfied that that the proposed scheme would not be likely to have significant effects on climate, on the basis of information submitted and submissions received on the file, and subject to mitigation and monitoring measures.

10.2.4 Noise and Vibration

10.2.4.1 Introduction

Chapter 9 of the EIAR identifies, describes and assesses the potential direct and indirect impacts of the proposed scheme on noise and vibration during its construction and operation phases. This topic has numerous interactions with other chapters of the EIAR which are addressed in separate sections of this assessment.

10.2.4.2 Existing Environment

The applicant utilised Traffic Noise Level Monitoring Data which is recorded and mapped by the EPA. Attended baseline noise surveys were undertaken at twenty four locations along the length of the Proposed Scheme between June and September 2020. Unattended surveys (one week in duration) were made at five locations between August and October 2020 to supplement the attended survey locations and the desktop baseline noise study. 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 LAeq raw data 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 lower when compared to normal conditions in 2019.

The baseline data results identify road traffic as the dominant noise experienced along the route during both daytime and nighttime hours. The average background noise during daytime hours varies along the route. Depending on the location, some experience a higher background noise levels than other locations. The results provided by the applicant indicate exceedances in the existing ambient noise levels at various locations along the route. This is attributed to existing traffic volumes along the proposed scheme route. 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. Survey details are set out in Section 1.3 of Appendix A9.1 of the EIAR.

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.

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

10.2.4.3 Potential Effects

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.

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 9.28 – 9.42 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.

Construction traffic has also been modelled in terms of noise impacts and it is expected that 340 HGV movements (170 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 34 two-way 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.

Section 9.4.3.4 of the EIAR outlines the modelling carried out by the applicant. The modelling is based on a construction of 2024. The highest potential noise impact location, as a result of redistributed traffic are at Grove Road, South Hill Avenue and Lower Dargle Road. It is noted that Grove Avenue is considered to have a major impact in terms of noise levels. However, the overall impact is determined to be negative, significant and temporary due to the limited period of construction. All other locations have a lesser potential impact. Thoe Board should Table 9.45 of the EIAR and the other related construction impacts at locations.

Construction compounds are considered in Table. 44. There are two compounds, southwest of Wilford Junction and at St Helen's, Stillorgan and unmitigated impacts ranges between 75 and 78 dB with exceedances expected in relation to evening and weekend noise upper limit thresholds.

The additional structures including the underpass at St Laurence's and Patrician Villas, the reconstruction of the side lodge at Woodbrook and the establishment of the bus interchange at UCD will all generate noise from construction activities from typical machinery deployed on site. This could range from 64 to 81 dB LAeq,T at a distance of 10 meters. Table 9.41 lists the typical Construction Noise Levels (CNL) associated with this phase of the project.

Demolition and construction works during the daytime could surpass limits at a distance of 25m without any mitigation measures. At evening at weekends this could be surpassed at distance up to 75m. Table 9.42 presents the locations where these activities will occur and the calculated CNLs. At the St Laurence Park subway, the nearest noise-sensitive locations (NSLs) will be located 25 meters from the proposed works. Without mitigation this will be negative and very significant if works occur at the weekend. There is a similar trend for the UCD interchange and Woodbrook Side Lodge in the absence of mitigation measures.

It is noted that there will be slight to moderate impacts from vibration generating activities such as ground breaking up to 10m from the activity. However, this dissipates beyond 50m. The vibration levels are not anticipated to be at a scale that would cause cosmetic or structural damage for protected or historical buildings or structures

In terms of the operation phase there will be continued noise impacts from traffic including that traffic which is redistributed on the surrounding road network. However, it is considered the EIAR has reasonably considered this not significant, again against the existing baseline environment.

The removal of trees which act as a barrier for noise could also have an impact. This has been raised by a number of observers as another reason to retain the trees. In many instances trees are being removed to widen the carriageway the facilitate the bus lane. There is the potential that the noise impact would increase on the basis of increasing proximity to the road. This has been raised in particular among submissions for the works at Patrician Villas, South Park, Woodbank Woodbrook and

properties generally along the Dublin Road in Section 3 Loughlinstown Roundabout to Bray North (Wilford Roundabout). Whilst this concerns is acknowledged, 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 noise and vibration. It is clear that the proposed scheme will have an overall positive/neutral impact on noise as a result of a modal shift to more sustainable forms of travel within the route and with the introduction of electric bus fleet. It is also noted that the proposed scheme includes, by design, additional vegetation planting to compensate for the trees removed.

Overall, the Board should be satisfied with the operational impacts, particularly in the context of the existing base line environment. During construction, the magnitude of effects is more significant. However, these are temporary construction activities and the EIAR has clearly demonstrated that magnitude of effects dissipates after a distance of 15m. The applicant has identified that impacts of weekend and nighttime working also, which is a readily mitigated impact should it arise.

10.2.4.4 Mitigation Measures

It is considered that any impacts would be acceptable subject to the mitigation and monitoring measures set out which will result in a reasonable possibility of effectively reducing their significance.

The impacts at construction phase will generally be temporary and short-term and would be controlled as part of the standard and best practice construction measures as well as specific mitigation measures set out in Section 9.5.1 of the EIAR.

A key mitigation will be the implementation of a Construction Environmental Management Plan. A condition will ensure the CEMP is implemented is recommended below, should the Board be minded to grant planning permission. 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. The applicant also intends to control noise at source through acoustic exhausts, canopies, lagging, screens and enclosures which can reduce noise by up to 10dB.

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.

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 LAeq,T at the closest properties impacted by the most intrusive works. The higher impacts will be at those properties where the prevailing baseline is below the specific predicted construction works noise levels. No significant effects are expected during daytime hours post mitigation.

There is no bespoke or extraordinary mitigations measures of note proposed.

10.2.4.5 Residual Impacts

The applicant cannot eliminate all noise -such is the nature of the proposed scheme. The applicant has identified standard measures to manage any residual impact and keep noise at acceptable levels. Specific construction work will have bespoke control strategies particularly during evening working where moderate to significant negative impacts would occur. This includes in particular, simply limiting the duration of those works and applying the DMRB Noise and Vibration guidelines. The applicant has stated that it can schedule works for a maximum of ten days or nights within any 15 consecutive day/night period, and no more than 40 days over six consecutive months when significant effects arise.

While there will be local variations in noise due to the operation of the scheme, most are slight to moderate impacts at particular locations. Again, the scheme has the objective of reducing traffic noise overall though use of public transport and switching to electrified fleets in time.

10.2.4.6 Cumulative Impacts

Any cumulative construction noise impacts that arise at sensitive NSLs can be successfully managed though a working hours condition and management of same through the CEMP and in consultation with the local authority. This is recommended below should the Board be minded to grant planning permission.

The applicant has identified up to 55 other projects withing 300m of the proposed scheme. This list of projects can be updated prior to construction and the applicant can ensure the CEMP reflects and deploys the appropriate mitigation to any cumulative impacts that might arise. Construction traffic noise is not expected to give rise to ant significant cumulative impacts also.

In terms of cumulative operational noise as a result of a range of projects in the GDA Transport Strategy. It is noted that initial traffic noise might be higher, however by Year 2043, traffic levels and associated noise are predicted to reduce overall. I noted the EIAR has identified 19 roads that will experience such a medium term noise impact. The applicant also reiterates that it is likely noise levels would be lower than considered in the EIAR due to the use of electric vehicles.

10.2.4.7 Conclusion

It is considered that the corresponding section of the EIAR has adequately identified, described and assessed the direct and indirect effects of the proposed scheme in respect of this topic and in accordance with the requirements of the EIA Directive.

It is considered that the proposed scheme, on the basis of information submitted and submission received on the file, and subject to mitigation and monitoring measures, would not be likely to have significant effects on noise and vibration.

10.2.5 Population

10.2.5.1 Introduction

Chapter 10 of the EIAR identifies, describes and assesses the potential direct and indirect impacts of the proposed scheme on population during its construction and operation phases. This topic has numerous interactions with other chapters of the EIAR which are addressed in separate sections of this assessment.

10.2.5.2 Existing Environment

The existing environment has been described in detail in Section 3.0. There are a number of land uses along the proposed route as described by the applicant and to be expected in such an urban location. Notable receptors including St Stephens Green, Leeson Street, Donnybrook, Donnybrook Bus Depot, RTE, UCD, Stillorgan, Foxrock, Cabinteely, Loughlinstown, Shankill and Bray. The applicant has estimated the total population adjacent to the proposed scheme as 152,000 according to the 2016 Census. The applicant identified 47,000 residential properties and 330 apartment buildings all which contribute to the 65,000 commuters using public transport. Public transport usage is estimated at 20% from 831 public transport access points. There are 300 commercial receptors along the proposed scheme.

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 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.

10.2.5.3 Potential Effects

The primary features of the scheme including upgraded bus and cycle infrastructure including upgrades to the public realm. It is anticipated the number employed int he scheme will peak between 150 to 280 workers which is a positive impact on the economy. The scheme will increase access to commercial and education opportunities across the study area. Additional positive impact arise from more reliable journeys overall

The impact to population is also effected by traffic air quality noise and visual impacts which are addressed in other sections. As described in these sections, this is most acute during construction phase. In summary, the majority of impacts to these topics are temporary and short term during the construction phase.

The impact of temporary land take is noted and is an issue for several third parties whose properties may be affected. This includes:

- 76 open areas,
- 40 residential properties (primarily in Section 3)
- 36 community facilities.

In particular, the Board should note the demolition of the Woodbrook Side Lodge which will result in profound, short-term impacts.

Due to changes in road layout and the movement of bus stops accessibility during the construction phase will be temporarily disrupted. However, access/egress to all location is expected to me maintained at all times in so far as practicable. The assessment of private vehicle traffic suggests, this impact will be negative, moderate and temporary.

In summary, there will be notable negative impacts for communities along the proposed scheme and in particular on pedestrians cyclists and private vehicle users. This is particular the case where construction activities are occurring and road diversions are required. Certain areas will experience a negative slight and temporary impact as a result of these activities this includes Donnybrook,

Booterstown and Shankill. The areas which are further away from the proposed scheme will experience neutral effects. The applicant also notes Westland Row and Bray as areas which will face negative moderate and temporary impacts because of changes to the vehicle accessibility during the construction phase.

The assessment of population interacts with a number of other topics considered in this EIAR. This includes Chapter 6 Traffic and Transport when construction traffic will have residual negative impact on general traffic. For Air Quality in Chapter 7, local receptors will experience a neutral and short-term impact. The noise assessment in Chapter 9 identified Grove Avenue, Lower Dargle Road and South Hill Avenue as areas that will experience significant noise impacts. Chapter 17 considers landscape and visual with the most significant impacts experienced in Section 3 between Loughlinstown and Wilford Roundabout due to the extensive tree removal proposed. Overall, these impacts from other topics would contribute to a negative impact generally on population and commercial receptors. This is particularly adjacent to the proposed scheme with the significance of the impact fall the further away the receptor is from the proposed scheme.

There is particular consideration given to commercial land and the impacts therein as a result of the land take required by the proposed scheme. A schedule of commercial business is provided in Appendix A10.1 of the EIAR which is noted. There is a range of commercial business types including supermarkets and food (Donnybrook Fair, P.M. O'Loughlin Foods, The Shankill Market, Bakelicious, Four Star Pizza Bray, SuperValu Bray), wine shop (Terroirs), architectural firms (MOLA Architecture), petrol stations (Circle K Donnybrook and Bray), vehicle services (FastFit/First Stop Donnybrook and Bray), car dealerships (James Hennesy Motors, Windsor Motors Bray), hardware shops (Interlock), tailoring/fashion (Alteration Rooms, MuMu, Bond Brothers), Shanganagh Marble & Stone Centre and Castle Street Shopping Centre among others.

In particular the commercial areas on Donnybrook at Donnybrook Fair and Mola Architecture and the car services opposite Donnybrook Stadium. There is also significant land take in Section 3 of the proposed scheme at Windsor Motors, Circle K Bray, Ford Motors and other shopping centres on Castle Street. However, the land take is not considered detrimental to the future operations of these commercial lands. It is noted that 12 commercial receptors will undergo a permanent land take. This is

particular significant at Circle K Bray due to the removal of several of the petrol pump bays.

I note in the Appendix A10.2 Economic Impact Report that the evidence suggests the infrastructure work will improve the public realm along the routes with positive impacts on businesses and individuals along the corridors. It is fair assessment that a better public realm attracts footfall. However, the negative impacts are acknowledged due to the disruption during construction the difficulties of commercial loading during operation as a result of the scheme layout. The economic assessment also considers gentrification as a result of the proposed scheme.

Other impacts related to commercial land use include accessibility to the businesses for both customers and employees. General accessibility will largely remain unchanged due to the applicants commitment to put measures in place to maintain access and egress during construction. While some businesses may face disruption during the construction phase no significant negative impacts are expected. The loss of car parking is also of concern to commercial land uses who rely on their availability for customers. Overall, however, it is not expected that loss of parking would result in an adverse impact on business due to the availability of parking elsewhere. It is noted that general traffic at road junctions on the surrounding road network is not expected to be significantly impacted.

The proposed scheme results in the acquisition of community receptors and residential properties which will experience similar impacts to commercial properties. However, the land take is largely restricted to garden areas on the periphery of the properties and does not directly impact buildings except for Woodbrook Lodge which would experience profound impacts only for the fact the lodge is being rebuilt. Access arrangements to schools along the proposed scheme including Woodbrook College and Rathmichael National School will experience some negative impacts, however, the land take is not expected to be detrimental to their use and operational requirements and the safety of students and other school users can be managed. The scheme will have a positive impact in terms of accessibility to community facilities across the proposed scheme and will foster greater social cohesion by offering greater modal choice in accessing different locations. Pedestrians will experience moderate to very-significant positive impacts. Cycling where the infrastructure is not always segregated will experience a not significant to moderate positive impact depending on the location. Bus users will experience a moderate to

profound positive impact as a result of the intervention. Overall, the proposed scheme will bring about positive impacts to community facilities along the route as a result of increased accessibility.

Overall, in the case of both commercial and community centres there will experience a positive, significant and long term impact as a result of the reduction in general traffic and long term improvement in air and noise impact in time. It is noted that the landscape impacts

Commercial Land Use and Accessibility Overview

The short-term impacts of infrastructure projects on local communities during construction are largely uncertain due to insufficient research. The applicant acknowledges that concerns about business disruption and community impact are very common prior to the undertaking of these types of long linear schemes.

In particular the negative impacts associated with delivery access for undertaking the deliveries themselves have been cited by observers to the file as a key issue. However, the applicant is satisfied that these concerns generally become resolved post-completion as businesses understand the operation of the proposed scheme and localised solutions are arranged. Several reports cited by the applicant indicated that many businesses thrive following road and public realm improvement works and it may also be the case the other business opportunities are created.

It is also noted that commercial property may become more viable and attractive for investment. The proposed infrastructure would see an increase in walking and cycling making it more assessable and attractive for local customers. There is also a positive health impact as a result of increased opportunity for walking and cycling in a safer environment. It is acknowledged in the applicants documents that there are potential downsides such a gentrification and rising property prices which could impact existing local communities

In terms of the loss of car parking as a result of the proposed scheme, the applicant has provided detail of research carried out in Appendix A10.2. The studies, while not based on an Irish experience, suggest that replacing car parking with bike lanes can enhance commercial opportunities.

An example provided is London, were 81% of Londoners express safety concerns as the main barrier for them cycling. A second example is in New York where a study

examined the economic effect of changing car parking to cycle facilities. Overall, the commercial spend increased due to more frequent visits by cyclists.

While these studies are not directly applicable to the proposed scheme. They do indicate that the loss of commercial car parking for new cycle infrastructure does not necessarily harm business and can have the effect of increased visits and spending. It also noted that the infrastructure increases accessibility for all road users and in particular for vulnerable road users, those with disabilities or visual impairments and indeed all age groups.

Overall, and based on the information provided by the applicant I am satisfied that the proposed scheme will improve communities an along the route by maintaining and increasing connectivity to their local communities which provide a range of local shops, businesses and community centres. This shift to improving accessibility for local residents is important as remote working continues and people spend more time in their local area and engage more frequently with local businesses and community centres in the course of the week.

Similarly, as the economy moves on from COVID-19, the scheme will also assist in the increasing demand for accessibility to Dublin City Centre and indeed other towns and neighbours along the proposed scheme where employment, commercial and education centres are located. Enhancements in the public transport will support this increase.

The commercial businesses dependant on car movements, such as petrol stations and tyre services in Donnybrook and Bray can continue to operate, albeit within a reduced operation space.

Ultimately, in the event that the CPO is confirmed by the Board, and the NTA exercise its powers of acquisition pursuant to such a confirmed CPO, Notices to Treat will be served on all those included in the confirmed CPO, and it will then be for persons to make a claim for compensation and establish that they have a compensable interest in the land in question.

10.2.5.4 Mitigation Measures

The proposed scheme has been through an extensive iterative design process. The focus has been on minimising the most significant environmental impacts and ensuring the schemes objectives are met. This process has ensured the significance

of any impacts to the population have been mitigated including commercial and community receptors.

As discussed, the impact on population interacts with several other topics including Chapter 6 (Traffic & Transport), Chapter 7 (Air Quality), Chapter 9 (Noise & Vibration), and Chapter 17 (Landscape (Townscape) & Visual). All mitigations within these chapters will ensure population impacts are also mitigated.

10.2.5.5 Residual Impacts

No significant residual impacts have been identified either in the Construction or Operational Phases.

10.2.5.6 Cumulative Impacts

The applicant has examined the potential for cumulative impacts on land take and commercial and community receptors during construction. This includes a significant volume of planning applications in the planning authorities along the scheme. Should projects occur together, coordination with other developers through the CEMP will ensure construction phase impacts can be mitigated. Significant cumulative impacts during operation are note expected.

10.2.5.7 Other Issues Raised

Concerns are raised within the submissions in relation to antisocial behaviour along the proposed scheme at bus stops, pedestrian links and where public realm areas are being improved. In addition, general concerns are raised in relation to pollution (noise, light, air, dust) from additional buses along the route, redistributed traffic (including rat running) and illegal parking and non-resident parking in streets/roads adjoining the scheme.

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. It is not considered the proposed scheme in of itself would generate an anti-social or general social nuisance. These matters are wider social issues and would be subject to general criminal and civil laws and policing by An Garda Siochana, should it arise. It also has to be acknowledged that bus stops, pedestrian links and public realm areas already exist along the proposed scheme and generally work well.

Third parties are also 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.

Specific concerns have been raised by several schools along the route relating to staff and student safety and the routing of additional buses past the school as well as the disruption to students during construction. This includes, among others:

- Coláiste Eoin and Coláiste Íosagáin, Stillorgan Road;
- Rathmichael National School, Stonebridge Road;
- St Annes National School, Stonebridge Road
- Woodbrook College, Dublin Road
- North Wicklow Educate Together Secondary School, Dublin Road;

Traffic impacts have been considered above and are not considered to be significant and I am therefore satisfied that the proposed scheme would not pose a risk to the safety of students or staff, given that the schools are all accessible by foot via a segregated footpath and other multimodal means including, bicycle, bus and car. 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 outside of school holidays to avoid such impacts from arising. This is reasonable and will also reduce traffic impacts within the surrounding area. 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 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.

10.2.5.8 Conclusion

I am satisfied that that the corresponding section of the EIAR has adequately identified, described and assessed the direct and indirect effects of the proposed scheme in respect of this topic and in accordance with the requirements of the EIA Directive.

I am satisfied that that the proposed scheme would not be likely to have significant effects on population. This is on the basis of information submitted and the submissions received on the file, and subject to mitigation and monitoring measures.

10.2.6 Human Health

10.2.6.1 Introduction

Chapter 11 of the EIAR identifies, describes and assesses the potential direct and indirect impacts of the proposed scheme on human health during its construction and operation phases. This topic has numerous interactions with other chapters of the EIAR which are addressed in separate sections of this assessment.

10.2.6.2 Existing Environment

The assessment of human health is carried out in the context of the overall health status of the population within the study area. Other issues linked to this include social inequalities and the overall exposure of the population to environmental impacts like pollution, noise, air, dust and other issues as a result of car movements.

The baseline identifies that Dublin has a better health profile than average in Ireland and there is a lower level of mortality rates. Other data that informs the baseline includes levels of air pollution which are largely within EI Limit value for NO2 and Particular Matter. There is a high level of exposure to traffic noise in the study area. This is particularly the case at night time for properties adjacent to the proposed scheme

10.2.6.3 Potential Effects

The construction phase is expected to temporarily increase traffic congestions. In addition, the construction phase will see an increase in noise, vibration light and dust which will be disruptive to adjoining receptors. This impact increases during any nighttime works and may cause sleep disturbances.

There are extensive mitigation measures already proposed for manage these construction phase impacts which are largely considered temporary and short term with no residual impacts arising.

The diversion required for pedestrians and cyclists have the potential to increase collision risk. The applicant will be required to manage this risk through associated Construction Traffic Management Plans and the CEMP.

Given the short term nature of these impacts, it is unlikely to result in a lasting health impact.

Once operational, the proposed scheme provide an opportunity for positive impacts and outcomes through increased cycling and walking opportunities. The applicant is also of the view that better public transport services will reduce stress and improve accessibility to a number of amenities. This will be positive in terms of mental wellbeing and address any health inequalities that exist.

In the long term, the operational phase will not result in any significant health hazards or adverse outcomes for the local population. At Patrician Villas, Shanganagh Park and South Park improved accessibility to an improved service will be positive in spite of the views expressed by observers in these locations.

The demolition of the Side Lodge in Woodbrook Estate is considered appropriate in the context of the need for the proposed scheme. However, the loss of home may lead to significant health impacts for the affected occupiers and/or owners. The applicant identifies research that indicates that those expected to lose their home, without options or control over the process, experience mental health impacts. The overall effect on population health is consider imperceptible. However, the individual impacts of losing a home may be significant.

10.2.6.4 Mitigation Measures

A primary mitigation will be traffic management and safety measures for vulnerable road users who are required to interact with the areas undergoing construction.

The applicant also intends to manage access to various health centres along the route to ensure access is maintained. These include St John of God's, St Columcille's and the Victoria Eye an Ear as well as various GP practices directly along the route.

In addition, the CTMP will have specific measures to manage emergency response vehicles who have to pass areas of construction.

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 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.

Construction phase activities are a common features in an urban environment. However, the applicant is mindful of adverse psychosocial responses to the Construction Phase. To mitigate this impact, it is proposed to provide sufficient information to the local community to ensure they understand the time and nature of works and can plan the period of works as required.

Ongoing community liaison is also proposed. The NTA will maintain responsibility for this.

10.2.6.5 Residual Impacts

The residual impacts can be adequately dealt with through ongoing communication and direct support to anyone experiencing disruption during the construction phase activities. This will mitigate any health impacts should they arise.

The health impacts related to air, noise and traffic will remain unchanged in spite of the mitigation measures proposed. However, no significant negative health impacts are anticipated from the construction phase activities.

As previously noted, the proposed development given its nature and the introduction of more sustainable modes of transport is expected to have a longer term positive impact on human health. Through walking, cycling and increased physical activities, there is a link to the reduction of chronic disease rates.

10.2.6.6 Cumulative Impacts

The applicant's assessment of human health identified 70 projects with the potential for cumulative effects when considered together with the proposed scheme. These are detailed in Appendix A21.1 of Volume 4 of the EIAR.

No significant cumulative impacts were identified during the construction phase. Any impacts that do arise with other construction projects in proximity to the scheme can be adequately dealt with through the CEMP.

10.2.6.7 Other Issues Raised

Several third parties who made submissions raised the mental health impacts as a result of the proposed scheme. This would primarily arise as a result of the impact to the townscape/landscape and the extensive removal of trees and other vegetation. This is most notable in Section 3 of the scheme.

While the proposed scheme will alter the fabric of the townscape along the proposed scheme. I am satisfied it will not markedly affect the prevailing townscape pattern or overriding urban and suburban character of the area.

No specific evidence has been provided to indicate that there will be a mental health impact as a result of the landscape change , nor has any qualified evidence been supplied to indicate that this is the case elsewhere.

The Board will note that there is already transport infrastructure within the general area which has been in existence for several decades. Thus, while it is acknowledged that the proposed scheme is a change, it is not wholly at odds with the surrounding townscape.

10.2.6.8 Conclusion

I am satisfied that that the corresponding section of the EIAR has adequately identified, described and assessed the direct and indirect effects of the proposed scheme in respect of this topic and in accordance with the requirements of the EIA Directive.

I am satisfied that that the proposed scheme would not be likely to have significant effects on human health. This is on the basis of information submitted and the submissions received on the file, and subject to mitigation and monitoring measures.

10.2.7 Biodiversity

10.2.7.1 Introduction

Chapter 12 of the EIAR identifies, describes and assesses the potential direct and indirect impacts of the proposed scheme on biodiversity during its construction and operation phases. This topic has numerous interactions with other chapters of the EIAR which are addressed in separate sections of this assessment.

10.2.7.2 Existing Environment

The existing environment is largely located in a built up area of Dublin City with typical habitats such as urban streets with trees, planting and stone walls as well as amenity grassland, parkland with mixed broadleaf woodland and ponds. As the site largely relates to an urban roadway, much of the surface is artificial. A key habitat along the proposed scheme are the existing trees which have been raised by several of the third party observers as having high biodiversity value.

There are several water features also along the proposed scheme, including the Grand Canal, the River Dodder, Crinken/Rathmichael Stream and Shanganagh River. The River Dargle bounds the site at the southern end also. A list of Water Bodies Hydrologically Connected to the Proposed Scheme and Within its Zone of Influence is set out in Table 12.4.

In terms of designated sites, Loughlinstown Wood pNHA is located adjacent to the proposed scheme, east of the N11 and before the Loughlinstown Roundabout. The Natura 2000 sites are addressed in the Appropriate Assessment Section of this report. It should be noted however, that the proposed scheme does not overlap with any Natura 2000 sites. There is a hydrological connection to the Dublin Bay and River Tolka Estuary SPA which is located approximately 900 m from the proposed scheme. The hydrological connection is via the Elm Park Stream(Brewery Stream_010).

The assessment in considering the various ecological receptors has defined a Zone of Influence. This depends on the specific receptor. The zones are set out in detail in Section 12.3.1 of the EIAR for the Board reference. I consider these acceptable and within the relevant guidance for different species.

Given the proposed scheme is largely limited to the existing corridor, terrestrial habitats adjacent to the site was primarily considered although the applicant also notes that any impact to the hydrological features may have an impact to habitats over a greater distance.

The applicant lists the habitats found in the footprint of the proposed scheme as follows:

- Arable crops (BC1);
- Flower beds and borders (BC4);

- Buildings and artificial surfaces (BL3);
- Tidal rivers (CW2);
- Spoil and bare ground (ED2);
- Recolonising bare ground (ED3);
- Depositing / lowland rivers (FW2);
- Canals (FW3);
- Reed and large sedge swamps (FS1);
- Amenity grassland (improved) (GA2);
- Dry meadows and grassy verges (GS2);
- Residential;
- (Mixed) broadleaved woodland (WD1);
- Scattered trees and parkland (WD5);
- Hedgerows (WL1);
- Treelines (WL2);
- Wet willow-alder-ash woodland (WN6);
- Scrub (WS1);
- Immature Woodland (WS2); and
- Ornamental / non-native shrub (WS3).

No protected plant species are recorded along the proposed scheme. There are several invasive species noted, however, including Himalayan balsam, Japanese knotweed and Giant hogweed.

Given the extensive tree cover, bat species are present including Leisler's, common pipistrelle and soprano pipistrelle. The applicant has identified a total of 40 potential roosts along the proposed scheme

At the River Dodder in Donnybrook, an otter sprainting post was recorded by the applicant on a rock in the watercourse approximately 30 m west of Anglesea Bridge.

In terms of ornithology the applicant notes 133 breeding bird species and 21 wintering bird species along the proposed scheme.

The applicant notes the Dublin City Biodiversity Action Plan 2021-2025, and corresponding plans in DLR and WCC also. These plans high habitats without any designation but of localised importance to the biodiversity of that area.

The Board should note that the baseline environment is based on both a desk and field study. The field study including numerous walkover surveys and detailed mammal, bird, reptile and amphibian surveys. These were carried out over 2018 and 2020 and were further updated in 2022 and 2023, the details of which are found in Section 12.2.3 of the EIAR.

Overall, I am satisfied that the habitats and species recorded are typical of why might be expected in such an urban environment.

10.2.7.3 Potential Effects

Construction

The proposed development does interact with areas of ecological interest, in spite of the majority of the scheme relating to the existing artificial roadway. Overall, I am satisfied the applicant has comprehensively assessed the impact to any local biodiversity receptors and has set out a plan to identify and manage any potential impacts should they arising during the proposed scheme's implementation.

There is potential for the scheme to have significant effects on the identified Natura 2000 sites, but also the NHAs and pNHAs. The applicant has also focused on the Qualifying interests and Species of Conservation Interest. Again, would refer the Board to the Appropriate Assessment in respect of such sites.

The applicant's consideration of impacts is within the ZOI is based on the nature of the development, its scale and the ecological sensitivity of the receptors as well as any potential pathway.

The primary ways in which adverse impacts may arise to Natura 2000 sites related to

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

• Habitat degradation as a result of introducing / spreading non-native invasive species; and

• Disturbance and displacement impacts

Habitat loss and fragmentation, Habitat degradation as a result of hydrogeological impacts and air quality impacts were scoped out from further assessment at the Stage 1 AA Screening.

The primary hydrological impacts arises from pollutants and any contaminants running off into the watercourse. This may include sediments. This would pose an

impact to the aquatic species such as otters who have been recorded on the River Dodder.

The applicant has also identified invasives species. These need to be managed and controlled to ensure they do not become dispersed and outcompete native species elsewhere.

The applicant is of the view that emissions from vehicles and construction activities has a limited direct impact on designated sites due to the distances to designated sites. The applicant notes the monitoring mechanisms as part of the assessment of air quality that need to be further examined during operation to ensure there is compliance with air quality standards.

The proposed development has the potential to impact on NHA and sixteen pNHAs. It is noted that the direct impacts are minimal due to the distance to the sites, however, similar to the Natura 2000 sites, hydrological impacts, invasive species and disturbance displacement may generate an indirect impact. The applicant states that mitigation measures will be necessary to prevent contaminants entering the water and invasive species spreading to NHAs.

There are no confirmed bat roosts located within the footprint of the Proposed Scheme. However, the removal of trees which are capable of supporting bat roost has to potential to have a significant impact. The applicant will need mitigation measures to prevent direct impacts during the construction phase.

The scheme could also impact breeding and wintering bird habitats due to the habitat removal and disturbance. However, any disturbance is not considered to have significant long term consequences for same.

Other mammals, including, bats, badgers, otters and other protected species are assessed in terms of disturbance or habitat loss also. Again, the impact is not expected to be significant subject to the mitigation measures proposed which will protect such species along the proposed scheme. Similarly, invertebrates, amphibians fish and reptiles are not expected to experience a significant impact subject to mitigation.

Overall, I am satisfied that the construction phase impacts can be successfully mitigated by the applicant. Many of the impacts identified in the EIAR are standard and common to all construction projects. There would be no adverse impacts subject

to detailed management strategies for the different habitats and species along the proposed scheme.

Operation

Ongoing impacts during the operation phase to designated sites or sites of biodiversity importance largely relate to the hydrological connection between the proposed scheme and any pollution event that may occur. Any event could have a significant impact on both habitats and the bird populations which is reliant on them.

Other operation impacts include habitat loss and fragmentation, specifically in terms of bird population and sites relied on by species for foraging and roosting.

The presence of and impact from invasive species such as giant hogweed and Japanese knotweed remains during the operational phase. The species could simply be spread through any maintenance activities being carried out along the proposed scheme. However, I am satisfied that there are standard management strategies that can be employed to minimise the impact of invasive species spread.

The applicant also notes air quality deterioration during the operation of the proposed scheme. However, the impacts are expected to be minimal in this regard. There will be a general increase in human activity and noise along the proposed scheme that may create a disturbance. However, the levels of activity and noise and not expected to be significantly above that already in existence.

It is noted that there is inbuilt mitigation through the Sustainable Urban Drainage Systems (SuDS) which will manage runoff and minimise impacts to downstream habitats.

Overall, the operational impacts on biodiversity vary, but are generally slight and long term.

10.2.7.4 Mitigation Measures

Prior to construction, the applicant will undertake confirmatory pre-construction surveys. These will be carried out by an experienced bat specialist.

In order to mitigate potential impacts on bats, the applicant has committed to several measures including:

Fencing for PRF trees in order to protected their roots.

Managing parking and stockpiling of materials near PRF trees

Employing a qualified arborist to evaluate the RFP trees and manage them appropriate to ensure their survival where appropriate.

If any additional PRFs are identified during the pre-construction surveys the applicant extend the mitigation measures to these trees prior to works taking place.

If bats are identified during construction when vegetation is being cleared works will halt immediately until a derogation is sought from the NPWS. It is also noted that applicant intends to deploy bat boxes in proximity to the trees which are identified for removal and are RFPs. This will ensure the impact is further minimised should bats be displaced.

The Woodbrook Side Lodge has the potential to host roosting bats. Internal and external surveys will be completed to determine this prior to construction. Should bats be found, a derogation licence would be required.

Bats are also susceptible to light pollution and the applicant will ensure the appointed contractor collaborates with an experienced ecologists to ensure the design of temporary and permanent light minimised light spill into bat habitats. Certain measures include motion sensor or timer triggered light, LED lights and other adaptions to minimise excessive light.

Badgers are a protected species under the Wildlife Act. They cannot be intentionally killed or injured and their breeding and resting places cannot be destroyed. The field surveys did not identify any badger sets but the potential remains for badgers in the study area generally. The primary mitigation for badgers are confirmatory pr-co surveys 12 months prior to construction. The applicant intends to implement the standard guidelines for the Treatment of Badgers prior to the Construction of National Road Schemes. This is reasonable.

The applicant has also identified mitigation measures for otters which include pre-construction surveys and supervision of any works at water crossing by a qualified ecologist. Any new otter sites for otters identified will be managed in accordance with relevant guidelines.

Other notable mitigation measures which minimise impacts across a number of species include:

- Implementation of a Surface Water Management Plan (SWMP)
- Implementation of a lighting plan to minimise impacts from light spill

- Implementation of a plan to limit tree interference to specific times/seasons (i.e. 1st of March to 31st of August)
- Implementation of the Landscaping Scheme and the establishment of additional trees, hedgerows and amenity grassland.
- Protective Fencing of certain features
- Use of modern equipment to minimise noise impacts

It is considered that any impacts would be acceptable subject to the mitigation and monitoring measures set out which will result in a reasonable possibility of effectively reducing their significance.

There is no bespoke or extraordinary mitigations measures of note proposed.

In respect of orchids, which was raised by the DAU I am satisfied that a condition can ensure this the management of this species through a Site Specific Habitats Protection and Re-instatement Method Statements as well as monitoring by a monitored by an Ecological Clerk of Works or Ecologist.

10.2.7.5 Residual Impacts

I draw the Board's attention to table 12.21 of the EIAR in which residual impacts are for the most part expected not to be significant. However, I note in relation bats, red, amber and green list bird species, and wintering birds there is a Likely significant residual effect at the local geographic scale (habitat loss; disturbance / displacement)

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 19 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.

In addition, whilst the Dodder River has shown the presence of otter. 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.

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.

10.2.7.6 Cumulative Impacts

No significant cumulative impacts were identified. Any impacts that do arise with construction projects in proximity to the scheme can be adequately dealt with through the CEMP and mitigation measures identified by the applicant.

10.2.7.7 Conclusion

It is considered that the corresponding section of the EIAR has adequately identified, described and assessed the direct and indirect effects of the proposed scheme in respect of this topic and in accordance with the requirements of the EIA Directive.

I am satisfied that that the proposed scheme would not be likely to have significant effects on biodiversity. This is on the basis of information submitted and submissions received on the file, and subject to mitigation and monitoring measures proposed.

10.2.8 Water

10.2.8.1 Introduction

Chapter 13 of the EIAR identifies, describes and assesses the potential direct and indirect impacts of the proposed scheme on water during its construction and operation phases. This topic has numerous interactions with other chapters of the EIAR which are addressed in separate sections of this assessment.

10.2.8.2 Existing Environment

The proposed scheme is within the River Liffey catchment. And the Hydrometric Areas of (HA) 09 (Liffey and Dublin Bay Catchment) and HA10 (Ovoca-Vartry 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. All the waterbodies identified are at risk with pressures arising from urban wastewater. Very little SUDs measures are present along the proposed routes.

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

- Grand Canal Main Line (Liffey and Dublin Bay);
- Dodder_050;
- Brewery Stream_010 (Elm Park Stream);
- Brewery Stream_010 (Priory Stream);
- Brewery Stream_010 (Brewery Stream);
- Dublin Bay;
- Kill of the Grange Stream_010;
- Carrickmines Stream_010 (Cabinteely Stream);
- Carrickmines Stream_010 (Carrickmines Stream);
- Shanganagh_010;
- Dargle_040 (River Rathmichael);
- Dargle_040 (River Dargle);
- Dargle Estuary; and
- South Western Irish Sea – Killiney Bay.

The surface water along the proposed scheme are discharged into sewers and drainage systems. It is highly like that they eventually flow into local water bodies. Between the city centre and Brendan Road in Donnybrook, there is a combined sewer which leads to the Ringsend Wastewater Treatment Plan. After Brendan Road is largely enters surface water sewers. A primary issues in the surface water design is surface run-off creating overflows in the foul and combined sewer networks.

The Board should note 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 below assessment will examine the potential for the proposed scheme to impact waterbodies within the study area.

The applicant has also identified 12 marine bathing waters which are downstream of the proposed scheme. The EPA has assessed their water quality as generally good or excellent.

Both the Dargle and Varty rivers which are within the Ovoca-Vartry catchment are designated salmonid rivers.

The applicant has provided a Flood Risk Assessment. At a high level, the proposed scheme is located within all three flood zones categorised by the OPW. Depending on the location there is a high, moderate and low risk of flooding from rivers and the coast.

10.2.8.3 Potential Effects

In the absence of mitigation measures, there is the potential for the proposed scheme to have impacts on hydrology, water quality and hydromorphology.

A primary issue is the alteration of the natural hydrological regime from dewatering. This can directly impact the ground water levels and affect the flow at nearby surface water features.

The drainage systems at a localised level may be impacted through the required diversions during construction and related soil compaction, requirement for hard standing and overall higher run-off rates into local water bodies.

In terms of water quality, there is a risk that construction activities would result in run-off contained a high level of suspended solids. There is also an increased risk during construction of materials and liquids such as oil, chemicals and concrete running off. These largely originate from spills and leaks that come from machinery employed during construction or poor practices for storage of materials particularly where they are stored adjacent to waterbodies.

Other impacts include sediment plumes, smothering bed substrates and disrupting existing morphological features.

The construction of the proposed scheme may also require the alteration to areas around the banks of waterbodies in order to install structures or carry out works. This would have a long-term impact on the aquatic environment.

There is a potential for impacts to arise to specific water bodies during construction. The potential for impacts to arise is summarised by the applicant Table 13.14 for reference. While the majority of watercourses have the potential to have an adverse, short-term impact as a result of Increased surface water runoff; Increased sediment in run off and Anthropogenic sources (fuel etc.). The significance is imperceptible or slight in most cases. It is noted that the Brewery Stream may have a moderate impact due to the construction of the temporary compound for the proposed scheme. The Shanganagh Stream will also have moderate impacts due to road widening that

will occur adjacent to the water course. The Dargle River could be significant as a result of the earthworks required at this location. There are no significant impacts expect to non-WFD water features.

In summary the construction will be short term and localised. Where there is a sensitive water body, the impact has the potential to be more significant and require appropriate mitigation measures.

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.

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.

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.

The applicant has carried out a flood risk assessment for the proposed scheme, which is appended to the EIAR. This site is at risk of pluvial and fluvial flooding, the extent of which has been outlined in the FRA prepared by Jacobs on behalf of the applicant. The proposed scheme is considered a highly vulnerable development in terms of its sensitivity to flooding and as such a justification test is required under the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009).

The proposed scheme has received significant policy support in the relevant development plans and is adjacent to zoned lands. These plans themselves are subject to an FRA which would have justified the policy and zoning objectives. It is important to bear in mind that this is now the build out of new road scheme, rather retrofitting an existing road. The proposed scheme is generally consistent with the zoning objectives and the most significant flood risk has been mitigated by avoidance.

There is a high risk of pluvial flooding along the entire Proposed Scheme. This is simply a result of the capacity of the standard and existing surface water network at this location, which is typically designed to contain a 20% AEP storm. It is beyond the scope of the Proposed Scheme to increase the capacity of the existing surface water network. The Proposed Scheme will result in the creation of additional impermeable surfaces for local sections of road widening. SuDS measures have been implemented to ensure that there is no change in existing runoff rates as a consequence of the scheme. This will ensure no increase in the risk of pluvial flooding.

The Proposed Scheme is at risk from fluvial flooding from Dodder River, Brewery Stream, Carrickmines Stream & Shanganagh River and Rathmichael Stream. The scheme is located in Flood Zones A and/or B. The Proposed Scheme will not affect the hydraulic capacity of Dodder River, Elm Park Stream, Brewery Stream, Carrickmines Stream & Shanganagh River, Rathmichael Stream, River Dargle or any structures which cross it.

Climate change has been intensified by the applicant as a wider flood risk primarily from increased rain fall and river follows in this instance. It should be noted that new drainage measures which installed as part of the scheme, including any SuDS, are designed to allow for future climate change. It should be also noted by the board that the Proposed Scheme, given its nature, would not exacerbate the impacts of climate change on the risk of fluvial flooding.

While no additional measures, aside from SUDS, are provided to minimise flood risk to adjacent land and use receptors, I am satisfied that the risk of increasing flood risk to adjacent properties will not change as a result of the proposed scheme. Any residual risk has been factored into the design.

With regard to the foregoing, I have reviewed the drainage implications of the proposed scheme and note that the drainage design will ensure no net increase in surface water flow discharges. The overall impacts in relation to flooding and water quality are positive along the route of the proposed scheme.

Overall, I have considered the submissions and the contents of the application in relation to water, including flooding, 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.

10.2.8.4 Mitigation Measures

It is considered that any impacts would be acceptable subject to the mitigation and monitoring measures set out which will result in a reasonable possibility of effectively reducing their significance.

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.

There is no bespoke or extraordinary mitigations measures of note proposed.

10.2.8.5 Residual Impacts

Subject to mitigation measures being implemented by the applicant, there will be no significant residual effect as a result of the proposed scheme.

10.2.8.6 Cumulative Impacts

The Water assessment identified 54 projects that could potentially have significant cumulative effects when combined with the Proposed Scheme, considering both construction and operation phases. The assessment concluded that, with the implementation of mitigation measures outlined in the Surface Water Management Plan (SWMP) and the use of Sustainable Drainage Systems (SuDS), the cumulative impacts during both construction and operation would not be significant. Further details can be found in Appendix A21.1 of Volume 4 of the EIAR.

10.2.8.7 Conclusion

It is considered that the corresponding section of the EIAR has adequately identified, described and assessed the direct and indirect effects of the proposed scheme in respect of this topic and in accordance with the requirements of the EIA Directive.

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.

It is considered that the proposed scheme would not be likely to have significant effects on water, on the basis of information submitted and submissions received on the file, and subject to mitigation and monitoring measures proposed.

10.2.9 Land, Soils, Geology & Hydrogeology

10.2.9.1 Introduction

Chapter 14 of the EIAR identifies, describes and assesses the potential direct and indirect impacts of the proposed scheme on lands, soils and geology during its construction and operation phases. This topic has numerous interactions with other chapters of the EIAR which are addressed in separate sections of this assessment.

10.2.9.2 Existing Environment

The Board can refer to Table 14.29 of the EIAR which sets out features of importance in the context of this topic. These features are classified in line with guidelines provided by the NRA.

The geology (soils and rock) beneath the study area of the Proposed Scheme mainly comprises made ground, alluvium and glacial till derived from limestone which are underlain by Carboniferous Limestone. To the south of the region, stretching from Dún Laoghaire on the coast in a south to south-west direction and located beneath much of the Dublin and Wicklow Mountains, are the older Caledonian granites known as the Leinster Granite. The land within the study area is mainly used for urban developments, including but not limited to; industrial, commercial, residential, and recreational.

Aquifers (which store / produce groundwater) within the study area of the Proposed Scheme are classified as ‘Locally Important’ (moderately productive in local zones)

or ‘Poor’ (generally unproductive except for local zones) in terms of their ability to produce water.

there is a potential for contaminated land to be found given the urban context in which the Proposed Scheme is located. The assessment of contamination focused on the area directly within the footprint of the Proposed Scheme and its immediate surroundings unless there is a connection between potential contamination sources and the proposed scheme. These possible sources have been identified and evaluated. A summary of Potential Sources of Contaminated Land Adjacent to the Proposed Scheme us set out in Table 14.24 of the EIAR. This includes petrol stations for which works are proposed.

There are no facilities within the Proposed Scheme that are either currently licensed or previously licensed with the EPA for waste, industrial emissions and integrated pollution control.

It is noted that a County geological site is identified at 51 St. Stephens Green (DC001) .The entrance lobby of the building is original from mid 1800s, and displays a demonstration set of Irish marbles.

It is noted that scheme specific ground investigations were carried out and are set out in Table 14.3 and the factual reports provided in Appendix A14.2 Ground Investigation Report in Volume 4 of the EIAR. These primarily relate where the proposed subway widening is proposed at Patrician Villas and the Upper Dargle Road.

10.2.9.3 Potential Effects

For ease of reference, potential impacts on the land soils geology and hydrogeology are summarised in Table 14.35. They largely arise out of routine construction practices. The impacts assessed during the Construction Phase of the Proposed Scheme include:

- Loss or damage of topsoil;
- Excavation of potentially contaminated ground;
- Loss of future quarry or pit reserves;
- Loss or damage of proportion of Geological Heritage Area;
- Loss or damage / contamination of parts of an aquifer; and
- Change to groundwater flows.

It must be stated at the outset that no significant impacts are expected to arise in relation to land, soil, geology and hydrogeology. Impacts are expected to occur in relation to the following:

- Loss or damage of topsoil – works giving rise to potential effects – contamination of soils due to spillage of concrete/hydrocarbons/bitumen sealants etc, excavations and soil stripping and construction machinery – magnitude of effects is expected to be slight to imperceptible.
- Excavation of potentially contaminated ground – 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, negligible significance
- Loss or damage of proportion of aquifer - minimal excavation into the limestone rock as part of the Proposed Scheme – magnitude of impact negligible. Overall, the significance of this impact is assessed as moderate due to potential of pollutants from runoff and ground disturbance entering the watercourse.
- Change to groundwater regime - Localised pumping of excavations could lead to change in groundwater levels – magnitude of effects – imperceptible.

There is a Geological Heritage feature located at 51 St Stpehen's Greens. It is a county geological site. However, there is very little interaction with the features itself and it will not result in an significant permanent impact that would effects its integrity. It is considered imperceptible overall.

Loughlinstown Wood which is a pNHA is a ground water dependant habitat. This can be impact by contamination and any changes in the ground water levels. Loughlinstown Wood may be impact by limited and temporary drawdown also due to the excavation works 400 m away. There is also a risk from pollution events to groundwater as a result of spills and accidents. The impact magnitude is considered moderate adverse. However, due to the designation of the site as a pNHA it the significance is elevated and considered significant due to the close proximity of the ecological receptors.

The Operational Phase has the potential to lead to occasional and accidental leakage of oil, petrol or diesel. This would result in the contamination of the surrounding environment and potential impact to lands soils and geology. However, the magnitude of the impact is considered to be negligible.

10.2.9.4 Mitigation Measures

It is considered that any impacts would be acceptable subject to the mitigation and monitoring measures set out which will result in a reasonable possibility of effectively reducing their significance.

The impacts at construction phase will generally be temporary and short-term and would be controlled as part of the standard and best practice construction measures as well as specific mitigation measures set out in the EIAR.

There is no bespoke or extraordinary mitigations measures of note proposed.

10.2.9.5 Residual Impacts

There will be no significant residual impacts in respect of this topic.

10.2.9.6 Cumulative Impacts

The residual impacts of the Proposed Scheme on Land, Soils, Geology, and Hydrogeology are anticipated to be negligible and imperceptible during both the construction and operational phases. Cumulative impacts have been considered in this regard and given the nature of the proposed works are considered to be unlikely.

10.2.9.7 Conclusion

I am satisfied that he corresponding section of the EIAR has adequately identified, described and assessed the direct and indirect effects of the proposed scheme in respect of this topic and in accordance with the requirements of the EIA Directive.

It is considered that the proposed scheme would not be likely to have significant effects on lands, soil, geology and hydrogeology, on the basis of information submitted and submission received on the file, and subject to mitigation and monitoring measures proposed by the applicant.

10.2.10 **Archaeological and Cultural Heritage**

10.2.10.1 Introduction

Chapter 15 of the EIAR identifies, describes and assesses the potential direct and indirect impacts of the proposed scheme on archaeological and cultural heritage during its construction and operation phases. This topic has numerous interactions with other chapters of the EIAR which are addressed in separate sections of this assessment.

10.2.10.2 Existing Environment

A detailed description of the baseline environment is provided in Section 15.3 of the EIAR and it is not intended to repeat it in this section.

Features which the Board should note include the fact that the road was originally a main coach road and contains many historical features dating to the 18th and 19th centuries including street furniture, coal holes, and granite kerbstones. DCC in particular has highlighted the importance of these features. The key archaeological sites which the Board should note include St Stephen's Green, a National Monument.

The site, given its built up nature, has extensive features at different locations throughout the site. These are from the Records of Monuments and Places / Sites and Monuments Record, sites on the Dublin City Industrial Heritage Record, cultural heritage assets, Zones of Archaeological Potential, and one non-designated archaeological site.

10.2.10.3 Potential Effects

The main potential impacts on archaeology and cultural heritage as a result of construction works could arise from:

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

In addition, should unknown features be found also as the earth works are undertaken.

There may be a temporary negative visual impact on the setting of monuments also during construction.

I draw the Board's attention to tables 15.14 to 15.18 of the EIAR in which Construction impacts are outlined in relation to archaeology and cultural heritage features. In, in summary no impacts of significance are expected in this regard. I am generally in agreement for all these features and the categorisation of their impact.

There will be a temporary impact on the setting of the national monument at St. Stephen's Green (RMP DU018-020334, Figure 15.1 Sheet 1 of 26 in Volume 3 of the

EIAR) during construction works. The national monument has a high sensitivity value and the magnitude of impact is medium, therefore the potential impact is Negative, Significant, Temporary.

I also note significant impacts to three Recorded Archaeological Sites/Monuments at RMP DU023-007, Ecclesiastical site Woodland (Monastery in ruins), RMP DU023-011001,DU023-011002, DU023-011004, St. Brigid's Church Graveyard, Ecclesiastical enclosure and RMP DU026-119, Burial ground (Mount Offaly))

The impact to coalholes, tramlines, cellars and granite bollards is expected to be slight. There is a possibility that the original tramlines still exist beneath the road surfaces however it would only be partial disturbed from works. Coal-holes found along the footpaths feature decorative cast metal covers and historic granite surrounds.

The Proposed Scheme will run through a Zone of Archaeological Potential (ZAP) for Kiltuc Church. It is anticipated that archaeological features could be found during the groundworks in the area particularly at Castle Farm Estate as a result of the proposed footpath. The impact is considered significant.

Construction Compounds

The construction compounds (BR2 and BR1) at St. Helen's Radisson Hotel and Bray North are proposed in previously undeveloped parkland. Both locations have a potential for undiscovered archaeological sites and features below ground. It is not expected any significant impacts would occur and both sites are considered to have a slight impact.

10.2.10.4 Mitigation Measures

It is considered that any impacts would be acceptable subject to the mitigation and monitoring measures set out which will result in a reasonable possibility of effectively reducing their significance.

Archaeological strategies such as preservation in situ, design alterations, and detailed recording are described to avoid negative impacts on archaeological sites.

The applicant will appoint an archaeologist to oversee and monitor groundworks in particular. Much of these works will require a licence from the DHLGH and National Monuments Service. Indeed, the works at St Stephen's Green and the national monument there will require Ministerial approval.

Features of cultural significance will be temporarily removed under supervision and stored safely before being reinstated post-construction.

There is no bespoke or extraordinary mitigations measures of note proposed.

10.2.10.5 Residual Impacts

Subject to the mitigation measures contained in the EIAR, no significant residual impacts are anticipated.

10.2.10.6 Cumulative Impacts

The Archaeological and Cultural Heritage assessment provided by the applicant concluded that both the construction and operation of the Proposed Scheme would not lead to any residual impacts. I am satisfied that the proposed scheme will not cause any significant cumulative impacts.

10.2.10.7 Conclusion

I am satisfied that the corresponding section of the EIAR has adequately identified, described and assessed the direct and indirect effects of the proposed scheme in respect of this topic and in accordance with the requirements of the EIA Directive.

It is considered that the proposed scheme, on the basis of information submitted and submission received on the file, and subject to mitigation and monitoring measures, would not be likely to have significant effects on Archaeological and Cultural Heritage.

10.2.11 **Architectural Heritage**

10.2.11.1 Introduction

Chapter 16 of the EIAR identifies, describes and assesses the potential direct and indirect impacts of the proposed scheme on archaeological and architectural heritage during its construction and operation phases. This topic has numerous interactions with other chapters of the EIAR which are addressed in separate sections of this assessment.

10.2.11.2 Existing Environment

A detailed description of the baseline environment is provided in Section 16.3 of the EIAR and it is not intended to repeat it. Further information on the assets is provided in Appendix A16.2 Inventory of Architectural Heritage Sites in Volume 4 of the EIAR.

In terms of statutory and non-statutory designations the following features should be noted in the course of assessment. Each element contributes to the overall architectural heritage of the corridor from Dublin City Centre to Bray.

- World Heritage Sites (City of Dublin and its Georgian core)
- Archaeological Heritage Sites of Archaeological Significance
- Protected Structures (422 number of structures);
- Architectural Conservation Areas (Belmont Avenue ACA and Foxrock ACA);
- Conservation Areas (4 sites - St Stephen's Green, Leeson Street Lower, Grand Canal, Dodder);
- NIAH Structures (157 number of structures);
- Designed Landscapes (76 sites);
- Industrial Heritage Sites;
- Other Structures of Interest; and
- Street Furniture.

10.2.11.3 Potential Effects

Table 16.4.3.8 of the EIAR provides a summary of potential construction phase impacts on architectural heritage during the Construction Phase.

The potential impacts on architectural heritage during the Construction Phase include:

- Direct impacts to the boundaries (walls, railings etc.) and entrance gates of protected structures and other architectural heritage features where road widening is required;
- Direct impacts to street furniture (i.e. lamp posts, post boxes, statues etc.) due to land acquisition, construction works to pavements, changes in the layout of footpaths and landscaping works;
- Direct impact on the protected structure Woodbrook Side Lodge (DLR RPS 1874), which will be demolished and a replacement lodge constructed at a new location within the same site;
- Indirect impacts as a result of the potential for damage to sensitive structures in areas where the construction works for the Proposed Scheme come into close contact with these structures;

- Indirect impacts as a result of the potential for damage to protected structures due to increased vibration from construction vehicles; and
- Visual impacts on the setting of protected structures or buildings or structures of architectural heritage interest, historic streetscapes and views which will temporarily impact on their settings during the Construction Phase

I am generally satisfied and in agreement with the assessment carried out in the EIAR in respect of each feature and rather than repeat this, focus and additional consideration is instead placed on the features which have a high sensitivity or the impact magnitude is similarly high or where observers have raised a concern.

Concern for historic kerbstones, particularly on Leeson Street and Donnybrook Road is raised in several submissions. The assessment in this respect is noted and the risks loss or damage is noted and results in a high magnitude of impact. However, the removing and relaying such historic paving is a relatively common practice in Dublin City and appropriate safeguards can be put in place to. In a wider sense, Potential impacts to street furniture are outlined in section 16.4.3.7 and I note the Council's concerns in relation to the relocation of 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.

The proposed land take on the west side of the Dublin Road in Shankill to accommodate a bus lane will directly impact on the retaining boundary wall to Rathmichael Parish Primary School (DLR RPS 1799) a Protected Structure of Regional Importance and Medium Sensitivity. The land take will impact on a concrete retaining wall and hedging only.

The land acquisition on the eastern side of Dublin Road and the western side of Shanganagh Road will affect the granite boundary wall (CBC0013BTH062) of the regionally significant and of medium sensitivity Saint Anne's Catholic Church in Shankill (RMP DU026-109, DLR RPS 1805). The trees along the boundary will be retained but at certain localised areas they require removal/replacement. The impact is considered to be Medium.

In addition, the statue of Our Lady at Saint Anne's Catholic Church in Shankill will be relocated due to land acquisition on the east side of the Dublin Road. While the statue holds a local significance in terms of architectural heritage. Overall, it is

considered low sensitivity. The practice of removing and reinstating such statuary is a relatively common practice and appropriate safeguards can be put in place.

South of Shankill, there is a significant concentration of protected structures which form or formed part of a demesne landscape with associated gate lodges, boundary walls and gates. These include Shanganagh Castle and demesne (DLR RPS 1845), Crinken Cottage (DLR RPS 1850) is one of its many gate lodges. Other houses in the area include Beauchamp House (DLR RPS 1862) built c.1830, Corke Lodge (DLR RPS 1869) built before 1816, Woodbrook House built 1840 and its c1909 gate lodges (DLR RPS 1870, 1871, 1874), Wilford House (DLR RPS 1873) built in the 1790s, Askefield House (DLR RPS 1860) and the Aske House (DLR RPS 1866), both of which are early 19th century.

The land take that is required on the Dublin Road in Shankill will impact several of the structures located there including their associated landscape features. There is a potential impact to Crinken house, its gates and the crenelated demesne wall. The wall needs to be removed and reinstated. This results in a medium impact. Several of the trees also require removal at this location.

At Shanganagh Castle, a boundary wall will be impact and reinstated. The overall impact is considered to be negligible.

The demesne walls of Askefield House and Beauchamp House will both in part be removed and reinstated. This will have a moderate impact. Trees will generally be retained.

Woodbrook House Demesne will have extensive sections of its wall impacted. The applicant considers this wall of medium sensitivity and the impacts would be moderate.

There is potential impacts and adverse visual impacts to twelve designed landscapes. These landscapes are of medium sensitivity. There six other designed landscapes of low sensitivity which will also have indirect negative impacts.

I am satisfied also that the location of bus stops and shelters and other public realm improvements and the provisions of new trees and SUDs will not have a singifcant impacts on any built heritage feature.

The proposed scheme 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 protected structures and related designations

The permanent negative impacts are noted at a boundary wall to Kiltuc Church (CBC0013BTH043) and Woodbrook Side Lodge, boundary wall and entrance gates (CBC0013BTH021)

Indirect visual impacts are predicted where construction activities negatively affect the setting of identified sites, buildings, and features. It is expected that these visual impacts during the Construction Phase will also be Temporary. For further details, refer to Chapter 17 (Landscape (Townscape) & Visual), which evaluates the potential for visual impact.

I am satisfied that exceptional circumstances exist for the direct and permanent impact to Woodbrook Side Lodge (DLR RPS 1874), which will be demolished and a replacement lodge constructed at a new location within the same site. The consideration of same are set out in Section 9.2.4.6 of this report and will not be repeated here.

10.2.11.4 Mitigation Measures

It is considered that any impacts would be acceptable subject to the mitigation and monitoring measures set out which will result in a reasonable possibility of effectively reducing their significance.

Appendix A16.3: Methodology for Works Affecting Sensitive and Historic Fabric is noted and consider appropriate. It sets out general principles for conservation, as well as the measures to be implemented for works to buildings and structures including Woodbrook Side Lodge Features, boundary treatments, historic paving and surface treatments and other street furniture. It is noted the applicant intend on reusing materials where appropriate.

As outlined above the applicant is to employ an Architectural Heritage Specialist to monitor works and to record all materials during removal and replacement. A archaeologist will also be employed during the proposed works 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.

No operational mitigation measures are required.

10.2.11.5 Residual Impacts

There will be significant residual impacts at Woodbrook Side Lodge as a result of its demolition. This will be Direct, Negative, Significant, Permanent. The plan of the proposed is to rebuild the Side Lodge in a different location. When the lodge is rebuilt, the residual impact lowers to a Direct, Negative, Moderate and Permanent impact.

There are no other significant Operational Phase residual impacts anticipated as a result of the Proposed Scheme.

It is noted that the applicant also identifies some risk of damage from vibration from road traffic, however, I am satisfied this risk would likely be present in any case and in the absence of the scheme.

10.2.11.6 Cumulative Impacts

Both the Greater Dublin Area Cycle Network Plan and the Belfield/Blackrock to City Centre Core Bus Corridor scheme were considered in the context of cumulative impacts. The area around Stillorgan Road and Nutley Lane will have a temporary negative visual impact on the architectural features in its vicinity. However, it is noted that applicant has plans to schedule the different projects under the BusConnects programme.

No cumulative effects are expected during the operational phase of the Proposed Scheme.

10.2.11.7 Conclusion

I am satisfied that the corresponding section of the EIAR has adequately identified, described and assessed the direct and indirect effects of the proposed scheme in respect of this topic and in accordance with the requirements of the EIA Directive.

It is considered that the proposed scheme would not be likely to have significant effects on Architectural Heritage. This is on the basis of information submitted and submissions received on the file, and subject to the mitigation and monitoring measures proposed by the applicant.

10.2.12 Landscape (Townscape) & Visual

10.2.12.1 Introduction

Chapter 17 of the EIAR identifies, describes and assesses the potential direct and indirect impacts of the proposed scheme on landscape (townscape) visual during its construction and operation phases. This topic has numerous interactions with other chapters of the EIAR which are addressed in separate sections of this assessment.

10.2.12.2 Existing Environment

The Applicant has provided and overview of the proposed scheme and its baseline environment in Section 17.3 of the EIAR. It is not intended to repeat it. It provides a detail account of planning policy for landscape in the three county development plans and indeed the local area plans where relevant.

The Board should refer to Table 17.6 of the EIAR in which an analysis of the baseline townscape and visual environment is proposed. It includes a description of the townscape character, streetscape character, amenity designations, tree protections orders, woodland preservation objectives, protected views, protected structures and other community features of landscape or townscape prominence. It also assigns it a baseline sensitivity to each section of the proposed scheme. as follows:

Section 1 Very High

Section 2 – Low/Medium

Section 3 – Very High

Section 4 - High

It is noted that the baseline was established through desk studies and complemented by walk over surveys and targeted visual surveys as required.

10.2.12.3 Potential Effects

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 scheme 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. 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 17.4.1.3.5 of the EIAR.

During the operational phase of the proposed scheme, there may be landscape changes as a result of different traffic movements, SUDS and changes to road surfaces as well as the upgraded public realm features.

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 scheme. 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.

In the interest of conciseness, I will examine the potential impacts relevant to each of the 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.

Section 1: Leeson Street to Donnybrook (Anglesea Junction) has a very high baseline sensitivity and the magnitude of change is considered medium resulting in negative, moderate and short-term impacts. This is owing largely to the 18th and 19th century streetscape which is long established with mature trees. However, much of the established streetscape will not be impacted as a result of the proposed scheme.

Section 2: Donnybrook (Anglesea Road Junction) to Loughlinstown has a low /medium baseline sensitivity, however, the magnitude of change is considered low resulting in negative, slight and short-term impacts. The sensitivity becomes lower at this section given the existing dual-carriageway and larger junctions which dominate the townscape. However, much of the established townscape will not be impacted as a result of the proposed scheme.

Section 3: Loughlinstown Roundabout to Wilford Roundabout has a very high baseline sensitivity, and the magnitude of change is considered very high resulting in negative, very significant and short-term impacts. Once the scheme leaves the dual-carriageway the character changes and there are larger tracts of parkland, many of which form or formed part of historic demesne landscapes with associate protected structures. There is several tracts where widening is proposed along this section, along with changes to treelines and boundaries and the demolition of a protected structure which has resulted in such a very significant impact.

Section 4: Bray North to Bray South (Wilford Roundabout to Fran O'Toole Bridge) has a high baseline sensitivity, and the magnitude of change is considered medium-high resulting in negative, moderate / significant and short-term impacts. This is largely a result of a transitions from a suburban area to the town edge. Again, there is several tracts where widening is proposed along this section, along with changes to treelines and boundaries a which has resulted in such a significant impact.

The Board's assessment may be aided by Photomontages provided by the applicant. They have been prepared from key or illustrative viewpoints to give an indication of changes and potential effects resulting from the Proposed Scheme during the Operational Phase after the implementation of the Proposed Scheme. The proposed views are shown with proposed planting at approximately 10 to 15 years post-completion of the Construction Phase. There are no photomontages provided of the impact during construction or in the intervening, say 1 year or 5 year scenario. I am satisfied that these are not required and would not change the outcome of any assessment. The applicant has adequately described the impact through the written EIAR and has been circumspect in bringing the Board's attention to the significant impacts.

It is clear that the two main areas of significance in terms of changes to the streetscape relate to Sections 3 and 4, particularly where street boundaries are changed and trees are removed. 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, in most case, will set back or replace in-situ the boundary treatment and the demolition of the Woodbrook Side Lodge will provide a safe and vastly improved cycle and pedestrian environment between Bray and Shankill which is becoming increasingly development with a wide range of housing estates at Woodbrook and Shanganagh.

The tree removal is a significant impact, but I am satisfied that the applicant has assessed it in full. Given the spatial constraints of the built environment, there is an inherent policy juxtaposition between sustainable transport objectives and amenity designations in the relevant development plans. The designations for amenities and tree preservation will result in a high magnitude of change. 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. The level of tree removal is also linked to property receptors and the amenity they enjoy. I am satisfied, having visited the site and considered all the relevant documentation that while the proposed scheme will be disruptive, it is not considered detrimental to the use and enjoyment of these spaces. Furthermore, new trees will be introduced in this area and as such impacts will not be permanent.

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.

10.2.12.4 Mitigation Measures

Mitigation has largely been through design and the avoidance of townscape receptors such as treelines etc. Albeit they cannot always be avoided as evidenced in the impact assessment above.

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.

No mitigation or monitoring is proposed for the operational phase of the development. However, I do recommend that the applicant be required to adequately protect planting from damage until established. Any plants which die, are removed or become seriously damaged or diseased, within a period of five years from the completion of the development should be replaced, unless otherwise agreed in writing with the planning authority. A condition is attached below should the Board be minded to grant planning permission.

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.

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.

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 to be removed.

It is evident that the landscaping and public realm measures intend to soften the existing hard landscape with the use of edge planting, additional trees, pocket gardens and green pockets at junctions. Overall, the proposed schemes provide for a more inviting space designed to cater for an improved pedestrian flow and environment. Replanting of trees to be removed at ant location can 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.

Having regard to the plans submitted, I am satisfied that the proposed scheme will have a positive impact to the landscape and to people's experience of the street. The landscaping will be softened in many respects and the experience pedestrian and cyclist will be positive.

10.2.12.5 Residual Impacts

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.

10.2.12.6 Cumulative Impacts

I am also satisfied that while some cumulative effects may arise from the Proposed Scheme together with existing and permitted developments, these would be avoided, managed and mitigated by the measures which form part of the Proposed Scheme and through suitable conditions.

10.2.12.7 Conclusion

It is considered that the corresponding section of the EIAR has adequately identified, described and assessed the direct and indirect effects of the proposed scheme in respect of this topic and in accordance with the requirements of the EIA Directive.

It is considered that the proposed scheme, on the basis of information submitted and submission received on the file, and subject to mitigation and monitoring measures, would not be likely to have long-term effects on Landscape (Townscape) & Visual.

10.2.13 **Waste & Resources**

10.2.13.1 Introduction

Chapter 18 of the EIAR identifies, describes and assesses the potential direct and indirect impacts of the proposed scheme on waste and resources during its construction and operation phases. This topic has numerous interactions with other chapters of the EIAR which are addressed in separate sections of this assessment.

10.2.13.2 Existing Environment

The baseline environment for waste and by-products management in Ireland is outlined in the EIAR. The primary was from the proposed development will be construction and demolition wastes including excavated material during the construction phase. There will also be municipal type was as a result of construction and operational activities which would arise from ongoing maintenance.

Under the Waste Directive Regulations, certain materials are classified as by-products instead of waste materials. This is the case for soil and stone waste that arising during construction. However, they need to meet the specific requirements set out in the regulations to ensure their re-use. It is the responsibility of the

contractor to ensure compliance with these regulations as required. There are also responsible for any EPA notifications that arise should certain types of waste arise.

10.2.13.3 Potential Effects

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.

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

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 41,000 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.

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.

The estimated 8,480 tonnes of demolition waste which will be generated as a result of the Proposed Scheme is equivalent to 0.07% of the C&D waste management baseline

It is estimated that up to 250 tonnes of contaminated material could be generated from the excavation of the forecourt of the Circle K Petrol station in Bray.

The total forecast of surplus excavation material from the Proposed Scheme will be 181,000 tonnes and is equivalent to 1.52% of the C&D waste management baseline.

It is anticipated that there will typically be 150-200, possibly up to 280 at peak, construction staff employed over the Construction Phase of the Proposed Scheme.

The potential impacts from demolition, excavation, construction, and municipal waste during the Construction Phase are classified as adverse without the application of relevant mitigation measures. The contractor is responsible for the compliance with

the relevant legislation and regulations and ensure any waste or materials are managed by authorised facilities.

Overall, the construction phase impacts are categorised as follows:

- Demolition waste Adverse, Not Significant and Short-Term
- Excavation waste Adverse, Slight and Short-Term
- Construction waste Adverse, Imperceptible and Short-Term
- Municipal waste Adverse, Imperceptible and Short-Term

The Operational Phase of the Proposed Scheme is not predicted to give rise to significant adverse impacts. The potential Operational Phase Impacts are categorised as follows

- C&D waste Positive, Not Significant and Long-term
- Municipal waste Neutral and Long-term

Overall, the Proposed Scheme is not anticipated to yield significant adverse impacts during its Operational Phase.

10.2.13.4 Mitigation Measures

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.

There is no bespoke or extraordinary mitigations measures of note proposed.

10.2.13.5 Residual Impacts

No significant residual impacts expected.

10.2.13.6 Cumulative Impacts

No significant cumulative impacts expected.

10.2.13.7 Conclusion

It is considered that the corresponding section of the EIAR has adequately identified, described and assessed the direct and indirect effects of the proposed scheme in respect of this topic and in accordance with the requirements of the EIA Directive.

It is considered that the proposed scheme, on the basis of information submitted and submission received on the file, and subject to mitigation and monitoring measures, would not be likely to have significant effects on water and resources.

10.2.14 **Material Assets**

10.2.14.1 Introduction

Chapter 19 of the EIAR identifies, describes and assesses the potential direct and indirect impacts of the proposed scheme on material assets during its construction and operation phases. This topic has numerous interactions with other chapters of the EIAR which are addressed in separate sections of this assessment.

10.2.14.2 Existing Environment

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

- Roads and Bridges
- Canals
- Electricity;
- Water / Wastewater;
- Surface Water Drainage;
- Gas; and
- Telecommunications

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

10.2.14.3 Potential Effects

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.

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.

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 may result in temporary and short-term interruptions to electricity supply.

There will be a temporary impact to St Laurence's Underpass at Patrician Villas. When it is being installed it will have a negative, slight impact. This will be disruptive for residents of the area who wish to access Stillorgan Village. However, there are other routes that can be used in the short term. Similar assessment would apply to closure to other pedestrian bridges etc. along the proposed scheme.

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.

10.2.14.4 Mitigation Measures

Ongoing consultation with material asset providers, owners and managers will mitigate the majority of impacts and disruption. Ongoing community liaison will also result in its successful mitigation.

10.2.14.5 Residual Impacts

No significant residual impacts have been identified either in the Construction or Operational Phases.

10.2.14.6 Cumulative Impacts

No significant cumulative impacts are expected.

10.2.14.7 Conclusion

I am satisfied that the corresponding section of the EIAR has adequately identified, described and assessed the direct and indirect effects of the proposed scheme in respect of this topic and in accordance with the requirements of the EIA Directive.

It is considered that the proposed scheme would not be likely to have significant effects on material assets. The assessment is based on the information submitted and submissions received on the file, and subject to mitigation and monitoring measures proposed by the applicant.

10.2.15 Risk of Major Accidents and/or Disasters

10.2.15.1 Introduction

Chapter 20 of the EIAR identifies, describes and assesses the potential direct and indirect impacts of the proposed scheme on major accidents and/or disasters during its construction and operation phases. This topic has numerous interactions with other chapters of the EIAR which are addressed in separate sections of this assessment.

10.2.15.2 Existing Environment

A risk assessment that was carried out in three stages (Identification and Screening – setting out a list of potential incidents, Risk Classification – evaluating the likelihood of the potential incident arising as well as classifying its consequence, and Risk Evaluation – determining the level of significance). This process facilitates the assessment of the likely impacts of such incidents/disasters in relation to all environmental, social and economic receptors.

10.2.15.3 Potential Effects

Table 20.4 of the EIAR sets out the Rating of Major Accidents and Disasters in the Absence of Mitigation.

For the Construction Phase, there were a number of risks that were deemed low and were not considered further. No high risks were identified and the following medium level risks were identified for the Construction Phase:

- Risk of gas explosion due to striking underground gas mains during excavation works;
- Risk of striking high-voltage overhead power lines during works at St. Laurence Subway – **Medium Risk**;
- Ground collapse during structural works;
- Risk of encountering and mobilising contaminants during construction of road through existing petrol station forecourt in North Bray – **Medium risk**;
- Risk of pollution occurring to a watercourse or groundwater, most notably associated with the release of fine sediments during construction works; and
- Risk of spread of non-native invasive species during construction works, particularly during site clearance – **Medium Risk**.

No significant risks were identified as likely to occur during the Operational Phase.

The Proposed Scheme is not located within the consultation zone of any Seveso sites.

10.2.15.4 Mitigation Measures

The Mitigation and Monitoring Measure are largely address through comprehensive design iteration, with particular emphasis on avoiding or reducing the potential for environmental impacts, where practicable, whilst ensuring the objectives of the Proposed Scheme are attained.

IN addition, the CEMP, C&DRWMP, CTMP, Invasive Species Management Plan, Surface Water Management Plan and Environmental Incident Response Plan will also minimise risks

10.2.15.5 Residual Impacts

There will be no significant residual effect as a result of the proposed scheme.

10.2.15.6 Cumulative Impacts

It is considered that subject to mitigation measures that there will be no significant cumulative effects as a result of the proposed scheme due to the lack of any significant impacts associated with either the construction or operation phase.

10.2.15.7 Conclusion

It is considered that the corresponding section of the EIAR has adequately identified, described and assessed the direct and indirect effects of the proposed scheme in respect of this topic and in accordance with the requirements of the EIA Directive.

It is considered that the proposed scheme would not be likely to result in a risk of major accident or disaster. I am making this conclusion on the basis of information submitted and submission received on the file, and subject to mitigation and monitoring measures,

10.3 Cumulative Impacts

Each chapter of this EIA describes and assesses the potential cumulative impacts of the proposed scheme as it relates to that topic during its construction and operation phases. The applicant has included a significant volume of information in its EIAR, in

relation to the proposed scheme, related developments and planning histories in the area and the likely significant effects on the environment.

The proposed scheme is a linear development of some 20 km in an urban area of Dublin City. It would be unprecedented if it did not happen to interact with other mobility schemes and indeed private development such as that in the residential and commercial sector.

The proposed scheme is a continuation of an existing facility long established in this area, the extent of land-take is minimal and not significant in the context of its industrial site, and the development will not result in significant emissions to the environment. I am satisfied that the applicant has proposed effective measures to ensure that adverse significant impacts can be avoided. The works proposed are inherently flexible and can be scheduled and managed to ensure impacts, in particular, traffic, air, climate and noise are minor and short term.

Should the proposed scheme occur in tandem with other development, any impacts would be of a temporary nature and short-term given:

- the nature of the proposed scheme, which will result in a continuation of the existing use and only has limited and offline built structures proposed;
- the location of lands to be developed,
- the scheduled and phased approach to the proposed scheme with an overall programme of 36 months
- the location and distance to the other existing and/or approved projects and the likelihood of temporal overlap of construction works between projects.
- the compliance with its mitigation and monitoring measures and the implementation of standard and best practice construction and operation measures.

During operation, overall, the development will not result in significant emission increases to the environment and long-term it will in fact improve the situation. It is considered, on the basis of information submitted and submission received on the file, unlikely that unacceptable cumulative impacts with other existing and/or approved projects would arise subject to mitigation and monitoring measures.

It is considered that the corresponding section of the EIAR has adequately identified, described and assessed the direct and indirect cumulative effects of the proposed

scheme in respect of all topics and in accordance with the requirements of the EIA Directive.

10.4 Transboundary Effects

Given the location of the proposed scheme there is no potential for significant transboundary effects.

10.5 Interactive Impacts

I have considered the interrelationships between the various EIAR topics and whether these may as a whole affect the environment, even though the effects may be acceptable when considered on an individual basis. Table 21.29 of the EIAR provides a matrix of interactions between environmental factors during the construction and operational phases of the proposed development. Significant interactions occur between population, human health (which are treated as an individual Section in my EIA as these topics are intrinsically linked) and these two topics are further linked to varying degrees of significance to all the other topics (biodiversity, land and soils, water, air quality, climate, noise and vibration, waste, landscape/ townscape/visual, traffic and transport, cultural/architectural/archaeological heritage, traffic and transport as well as major accidents) either through direct connection, perception or appreciation.

The interaction between traffic and transport and climate is one of the main drivers behind the Proposed Scheme. The reduction in operational phase traffic and modal shift to more sustainable means of transport will reduce GHG emissions and associated impacts on climate.

The proposed construction phase of the development has the most potential to interact with human health and biodiversity in relation to water contamination with the potential for pollutants to enter waterbodies through spillage to directly impact human health and biodiversity. In this regard I note that with the application of the CEMP measures to protect water quality residual impacts to water were expected to be imperceptible and as such there is no likely significant interaction between Water and Human Health, Population or Water and Biodiversity from the construction phase of the Proposed Scheme. Similarly, with the application of SuDS and the proposed maintenance programme provided for there will be no significant interactions between these topics during the operational phase.

Population / Human health and biodiversity interact with air quality, noise and vibration, as well as traffic. While I note some adverse localised air quality impacts will arise, I am satisfied on the basis of the assessment set out above, information provided, and having regard to the location and nature of the Proposed Scheme (representing works to an existing transport corridor within an urban environment) that no significant impacts are expected in this regard and there is no likely significant interaction between these topics and human health/population.

Traffic and population/human health interactions will occur during construction where access may be disrupted and diversions required, this can lead to stress. The construction phase could also potentially affect local drainage and present an increase of flood risk with associated impacts on human health. These impacts are likely to be imperceptible, and are capable of management and control, I am therefore satisfied that no significant interaction will occur between these factors during the construction phase. In terms of the operational phase the modal shift encouraged and facilitated by the Proposed Scheme will provide for beneficial interactions from traffic and population/human health due to increased accessibility, improved cycling, walking and public transport infrastructure.

Interactions will also arise between population/human health and landscape/ townscape/visual. The construction phase will have impacts on a number of local amenities and open spaces, as well as representing the removal of a significant number of trees from along the route which are enjoyed by the community. On the basis of the information provided access to community spaces will be maintained insofar as practicable during construction and that phase will also provide for additional planting of trees and improvements to the public realm which will mature through the operational phase. I am satisfied therefore that the significance of interactions in this regard will be negligible and balanced against the public realm improvements and increased accessibility that will arise from the Proposed Scheme which will influence wellbeing, as well as providing opportunities for increased outdoor activity and social interactions with associated health benefits.

There is also the possibility of interactions between population/human health and material assets during the construction phase due to the potential for disruption to services/utilities. I am satisfied on the basis of information received that any such disruptions will be minimised and where necessary appropriate management and

mitigation can be applied through the construction process to ensure that any such interactions will not give rise to significant effect.

I acknowledge the potential for interactions between the topics of Biodiversity, Traffic, Land, Soils, Geology and hydrology, water, air quality, noise and vibration as well as landscape/visual. These potential interactions arise from tree removal and replanting (townscape), mortality risk (traffic), habitat degradation (water and air quality), and spread of invasives (soil). I am satisfied that while the potential for interactions exists that the mitigation measures provided within the submitted documentation will ensure these will be managed effectively and not give rise to significant impacts beyond those previously set out in the individual topic assessments above.

Potential interactions could also arise between land, soils, geology, and hydrology, and water due to the potential impact on water from works polluting watercourses, ground water or water supplies, including contaminated ground works. Such interactions have been discussed in the relevant topic sections and I am satisfied that the measures set out in the submitted documentation will ensure that the significance of interactions will be minimal.

There are also interactions between Landscape (townscape) and Visual, with Archaeology, Architectural and Cultural Heritage. All these factors influence the quality of townscape and place; however, I am satisfied that these interactions have been assessed, discussed and mitigated within the relevant sections of the EIA set out above.

Other potential interactions of a more minor nature include risks of major accidents with all topics, material assets and traffic, climate and water, climate and air quality, waste, traffic, among others. I consider these topics will not give rise to significant interactions and have been adequately considered and discussed within the individual topic discussions set out above.

Having regard to Section 21 of the EIAR and that set out above I am satisfied that effects as a result of interactions, both indirect and direct can be avoided, managed and / or mitigated for the most part by the measures which form part of the Proposed Scheme and where appropriate the stated mitigation measures can be augmented by specific conditions.

I consider the methodology carried out in the submitted EIAR to be appropriate as it assesses the Proposed Scheme with the other CBC projects, together with the other major transport proposals in the Greater Dublin Area and where appropriate considers other permitted developments, which I have augmented by considering the current relevant development and biodiversity plans and any additional relevant permissions/consents. I consider this to be a robust approach which allows a comprehensive assessment of the Proposed Scheme both by itself and in the context of any cumulative interactions with projects and plans in the area.

10.6 Reasoned Conclusion

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 scheme 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 scheme 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 scheme will have a significant positive effect on human health and population due to the displacement of CO2 from the atmosphere arising from an increased use of public transport which will be electrified and the reduction of cars on the route. Negative impacts during construction relate to the embodied carbon of construction materials which will have a negative significant impact but for the short term, any increase in carbon is considered significant, however the construction phase represents a significantly small percentage of the sectoral

emission ceilings outlined in CAP 23 for the 2021-2025 carbon budget period, the proposed scheme represents 0.087% 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 scheme on the environment would be primarily mitigated by environmental management measures, as appropriate.

Having regard to the above, the Board is satisfied that the proposed scheme 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.

11.0 Appropriate Assessment

The applicant has submitted an AA Screening Report and NIS which is dated August 2023 as part of the particulars supporting the planning application. The documentation is in line with current best practice guidance and provides adequate information to allow a complete ex2amination and identification of any potential significant effects of the development, alone, or in combination with other plans and projects on European sites.

The documentation was prepared by Scott Cawley, who are scientifically and technically competent to do so and the qualifications and experience of the authors of the report and various appendices associated with it are suitable and relevant. I am satisfied that all survey work has been undertaken and prepared by competent experts also in line with best practice and scientific and technical methods.

The application documentation includes information required in respect of the methodology applied, a description of the existing sites and 'Stage 1' and 'Stage 2' assessments. The scientific assessment to inform AA is presented in Sections 5-7 of the NIS submitted to the Board as part of the application. The conservation objectives of the various Qualifying Interests (QI) features and Special Conservation Interest (SCI) species are listed. Impact pathways are identified and the assessment of likely significant effects which could give rise to adverse effects on site integrity presented in Tables 2-8 of the NIS. Mitigation measures are presented from Section 7.1.4 of the NIS onwards under each site heading and detailed in full in the Construction Environmental Management Plan (CEMP), Invasive Species Management Plan, Surface Water Management Plan (SWMP); Construction and Demolition Resource and Waste Management Plan; and Environmental Incident Response Plan. and. An assessment of potential in-combination effects is presented in Section 9 of the NIS.

The requirements of Article 6(3) as related to AA of a project under Part XAB of the PDA are considered fully. The areas addressed in this assessment includes an AA of the implications of the proposed scheme on the integrity of each European site which are set out in Section 1.4 of this report.

The proposed scheme is not directly connected with or necessary to the management of a European Site and therefore it needs to be determined if the development is likely to have significant effects on a European site(s). I am satisfied

that all possible European Sites that could in anyway be affected have been considered by the applicant. I am also satisfied that all potential impact mechanisms have been considered and appropriately assessed within the NIS document.

It is noted that the estimated construction phase considered in the NIS is 30 months and this differs from that set out in the EIAR of 36 months. It is not considered that this temporal difference is material to the AA below.

The NIS submitted with the application concluded that, following the application of the detailed mitigation measures, the proposed scheme would not either alone or in combination with other plans or projects, adversely affect any European Site.

11.1 Receiving Environment

11.1.1 European Sites

The proposed scheme does not overlap with any European sites. The nearest European site to the site is South Dublin Bay and River Tolka Estuary SPA, which is located approximately 900 m away. The nearest European sites with a hydrological connection to the proposed scheme are South Dublin Bay and River Tolka Estuary SPA and South Dublin Bay SAC, which are located in Dublin Bay, approximately 1.3 km downstream of the proposed scheme.

11.1.2 Habitats

The receiving environment is described in line with standard methodology (Fossitt, 2000) and results of the field surveys are presented in Section 5 of the NIS and considered further in the assessment below. It is acknowledged that the proposed scheme is located in a highly urbanised environment. It is noted that there are 18 areas of the non-native invasive plant species comprising Japanese knotweed, Himalayan balsam and giant hogweed listed on the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations, 2011 identified along or adjacent to the Proposed scheme. These locations are summarised in Table 5 of the NIS. No records of any Annex II plant species were recorded within the footprint of the site during field surveys.

11.1.3 Hydrology

The proposed scheme crosses five watercourses: the Grand Canal, River Dodder, Brewery Stream, Shanganagh River and Rathmichael Stream, and ends on the northern bank of the River Dargle. The proposed scheme is also hydrologically

connected to Elm Park Stream, Booterstown Stream, Priory Stream, the Kill of the Grange Stream, Cabinteely Stream, Carrickmines Stream and South-western Irish Sea, as well as Dublin Bay via Ringsend WwTP. They all ultimately discharge into the Irish Sea at Liffey Estuary Lower, Dublin Bay and Southwestern Irish Sea – Killiney Bay.

The Irish Sea, where discharge occurs, relates to a significant number of European sites. 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 8 of the NIS.

11.1.4 Fauna incl. Surveys

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

Table 32: Surveys Undertaken	
Survey	Dates
Habitats and Flora	June and August 2018, August 2020 and May and August 2022
Instream Aquatic Habitat	Not considered necessary as there is no instream works.
Otter	June and August 2018, August 2020 and April 2022
Kingfisher	Not considered necessary as there is no instream works or disturbance of waterbodies.
Wintering Birds	**Allies River Road, (CBC0013WB001)** 9 Surveys in Wintering Bird Season 2020/21 **Shanganagh Park (CBC0013WB002)** 9 Surveys in Wintering Bird Season 2020/21 12 Surveys (twice a month) between October 2021 and March 2022

In respect of bird surveys, 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, 2010) 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.

Species identified during wintering bird surveys included Black headed gull and herring gull. Wintering bird activity was low across all visits. No droppings attributed

to light-bellied Brent goose were recorded along the transects. The disturbance at CBC0013WB002 was noted as high on this site due to animals (dogs off leash) and number of walkers using the public paths and Gaelic pitches for recreational exercise.

The desk study suggests that otters are present within 1km of the proposed scheme and throughout the wider study area. They use the Grand Canal for foraging and commuting and other water bodies like the River Liffey South Dublin Bay, the Shanganagh River, Deansgrange Stream and the Cabinteely Stream. There is evidence of sprainting posts and footprints from otters on the River Dodder which indicates some activity at this location. However, it is noted that flood relief measures have been introduced close to this location which may have impacted potential otter habitats. Sections of streams which interact with the proposed scheme have been culverted over the years and are unlikely to support otters. While the nearest designated European site for otters is the Wicklow Mountains SAC, located about 6.7km southwest of the Proposed scheme, the populations within the scheme's footprint may be connected to the SAC population.

11.2 Screening for Appropriate Assessment (Stage 1)

The AA Screening Report included in the NIS describes the proposed scheme, its receiving environment and relevant European Sites in the zone of influence of the development. The first test of Article 6(3) is to establish if the proposed scheme could result in likely significant effects to a European site, in which case the development is ‘screened in’ for further detailed assessment- AA (Stage 2).

A determination was prepared by the NTA (both published on the NTA website). The AA Screening concluded that there is the possibility for significant effects on the following European sites (no. 18), in the absence of mitigation, either arising from the project alone, or in combination with other plans and projects, as a result of hydrological impacts, hydrogeological impacts, invasive species and disturbance and displacement impacts:

SACs

- South Dublin Bay SAC,
- Bray Head SAC,

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

SPAs

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

Since the publication of the AA Screening Report, there have been minor design updates and updates to land plans used in the overall assessment of the proposed scheme. However, the conclusions of the AA Screening Report and determination remain unchanged. This NIS assesses the final Proposed scheme design. In addition, a new site has been designated as a candidate SPA called North-West Irish Sea cSPA (Site Code: 004236). This site will be assessed for completeness in conjunction with the other site named above.

In determining the potential significant effects of the proposed scheme, 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 scheme site. Similarly, a precautionary approach has been taken in relation to SCIs associated with SACs in the wider area.

This Zone of Influence was established based on the extent at which potential impacts may be carried via identified pathways (i.e., hydrological connection, ornithological behaviours). Having regard to the nature of the proposed scheme, the nature of the receiving environment and the source-pathway-receptor model. It is considered that the Zones of Influence identified are reasonable

Potential impacts and effects considered are presented in Table 1.

Table 33: Sites for which the likelihood of significant effects cannot be ruled out	
Potential Impacts	**European sites within Zone of Influence**
Habitat Loss and Fragmentation No European sites are at risk of direct habitat loss impacts. The proposed scheme will not result in the loss of a suitable inland feeding site for these SCI bird species. The proposed scheme has no potential for impacts on SCI species associated with SPAs to occur as a result of habitat loss / fragmentation. The proposed scheme will have no likely significant effects on raptor species (peregrine falcon and merlin), as a result of ex-situ habitat loss / fragmentation. Riverine habitat will not be subject to any instream works nor alteration to the territory currently occupied by otter.	**No** There are no European sites at risk of habitat loss and fragmentation effects.
Habitat Degradation/Effects on QI/SCI Species as a result of Hydrological Impacts The Proposed Scheme is hydrologically connected to Dublin Bay via the Dodder_50, Brewery Stream_010, Kill of the Grange Stream_010, Carrickmines Stream_010, Shanganagh_010, Dargle_040, South-western Irish Sea – Killiney Bay, and the Ringsend WwTP The potential 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 an event has the potential to affect mobile SCI bird species and QI mammal species that commute, forage and loaf in Dublin Bay	**Yes** There are European sites at risk of hydrological effects associated with the proposed scheme: • South Dublin Bay SAC, • Rockabill to Dalkey Island SAC, • North Dublin Bay SAC, • Wicklow Mountains SAC, • Lambay Island SAC, • South Dublin Bay and River Tolka Estuary SPA, • Dalkey Island SPA, • North Bull Island SPA, • Baldoyle Bay SPA, • The Murrough SPA, • Howth Head Coast SPA, • Ireland's Eye SPA, • Malahide Estuary SPA, • Rogerstown Estuary SPA,

	• Lambay Island SPA, • Skerries Islands SPA • Rockabill SPA and • North West Irish Sea cSPA
Habitat Degradation as a result of Hydrogeological Impacts Groundwater-dependant habitats, and the species those habitats support, in the local area that lie downgradient of the proposed scheme.	**No** There are no European sites at risk of hydrogeological effects associated with the Proposed scheme
Habitat Degradation as a result of introducing/ spreading Non-Native Invasive Species: There are eighteen (18) areas of non-native invasive plant species (Giant hogweed, Himalayan balsam, and Japanese knotweed) present within, or in close proximity to, the proposed scheme. There is potential for this to spread or be introduced, during construction and/or routine maintenance / management works, to terrestrial habitat areas in European sites downstream in Dublin Bay and beyond	**Yes** There are European sites at risk of Non-Native Invasive Species being introduced and spread as a result of the proposed scheme: • South Dublin Bay SAC, • Bray Head SAC, • Howth Head SAC, • Rockabill to Dalkey Island SAC, • North Dublin Bay SAC, • Wicklow Mountains SAC, • South Dublin Bay and River Tolka Estuary SPA, • Dalkey Island SPA and • North Bull Island SPA
Air Quality Impacts A reduction in air quality within the immediate vicinity of the construction works may occur as a consequence of dust deposition associated with these construction activities. The ZOI for construction related air quality effects arising from the proposed scheme has the potential to extend 50m from the site boundary, and 500m from the construction compounds during the construction phase. vehicle emission related air quality effects arising from the proposed scheme has potential to extend up to 200m from the proposed scheme boundary or associated diversion roads during the construction year and the operational phase.	**No** The nearest European site, South Dublin Bay and River Tolka Estuary SPA, is located approximately 900m from the Proposed Scheme (as the crow flies) and is therefore not located within the ZoI of this potential impact.
Disturbance and Displacement impacts There is a potential impact based on the predicted levels of noise, vibration and visual disturbance associated with the proposed scheme and taking into account the sensitivity of the QI species to disturbance effects 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	**Yes** There are European sites at risk of disturbance and displacement impacts associated with the proposed scheme: • South Dublin Bay and River Tolka Estuary SPA, • North Bull Island SPA, • Baldoyle Bay SPA, • The Murrough SPA, • Ireland's Eye SPA, • Malahide Estuary SPA, • Rogerstown Estuary SPA, • Lambay Island SPA and • Skerries Islands SPA.

It is noted that the following sites are within the ZoI if considering a nominal distance of 15 km: Malahide Estuary SAC, Ireland's Eye SAC, Baldoyle Bay SAC, Glenasmole Valley SAC, Knocksink Wood SAC, Ballyman Glen SAC, 000719 Glen of the Downs SAC, Carriggower Bog SAC, The Murrough Wetlands SAC. When considering the site and its qualifying interests it is noted that there is no or very limited hydrological or other connection with the site or there is no mobile species of qualifying interest that could frequent the site. It is considered that the proposed scheme would not be likely to have significant effects on any of these European sites and, accordingly, an AA of same is not required.

Having regard to the information presented in the AA Screening Report, NIS, submissions, the nature, size and location of the proposed scheme 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:

SACs

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

SPAs

- South Dublin Bay and River Tolka Estuary SPA,
- Dalkey Island SPA,
- North Bull Island SPA,
- Baldoyle Bay SPA,
- The Murrough SPA,
- Howth Head Coast SPA,
- Ireland's Eye SPA,
- Malahide Estuary SPA,
- Rogerstown Estuary SPA,

- Lambay Island SPA,
- Skerries Islands SPA and
- Rockabill SPA
- North West Irish Sea cSPA

Given the hydrological connections, the risk to downstream sites from the spread / introduction of nonnative invasive species and disturbance effects associated with the construction or operation of the proposed scheme it is reasonable to conclude that there is a potential for impacts to arise to European Sites, their QIs and conservation objectives.

Further analysis in the AA (Stage 2) is required to determine the significance of such impacts to these sites and QIs and to apply any mitigation measures to exclude adverse effects.

11.3 Appropriate Assessment (Stage 2)

The following objective assessment of the implications of the proposed scheme on the relevant conservation objectives of the European sites is based on the scientific information provided by the applicant and taking into account 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.

This assessment has had regard to relevant guidance including:

- Office of the Planning Regulator (OPR) (2021) AA Screening for Development Management: OPR Practice Note PN01•
- 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.
- EC (2018) Managing Natura 2000 sites. The provisions of Article 6 of the Habitats Directive 92/43/EEC
- Department of Environment, Heritage and Local Government (2010) AA of Plans and Projects in Ireland – Guidance for Planning Authorities
- NPWS (2010) AA under Article 6 of the Habitats Directive: Guidance for Planning Authorities. Circular NPW 1/10 & PSSP 2/10.

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.

A description of the sites and their Conservation Objectives and QIs/SCIs, including relevant attributes and targets for these sites, are set out in Section 7 Assessment of Potential Effects of the NIS.

The following tables summarise the information considered for the AA 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 34: AA Summary Matrix			
North Dublin Bay SAC [000206] **Detailed Conservation Objectives available:** ConservationObjectives.rdl (npws.ie)			
Summary of AA			
SCI (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. 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	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.
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.		
Atlantic salt meadows (Glauco-Puccinellietalia maritimae)	To maintain the favourable conservation condition in relation to habitat, community - extent/vegetation structure of habitat & physical structure /distribution		
Mediterranean salt meadows (Juncetalia maritimi)			

Embryonic shifting dunes	To restore the favourable conservation condition in relation to habitat – area/distribution/physical structure/vegetation structure and composition.		
Shifting dunes along the shoreline with Ammophila arenaria (white dunes)			
Fixed coastal dunes with herbaceous vegetation (grey dunes)			
Humid dune slacks			
Petalophyllum ralfsii (Petalwort)	To maintain the favourable conservation condition in relation to distribution/ population size/ habitat / hydrological conditions/ vegetation structure.		

Overall Conclusion: Integrity test

The applicant determined that following the implementation of mitigation, the construction and operation of this proposed scheme 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 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 scheme would not delay or prevent the attainment of the Conservation objectives of the North Dublin Bay SAC.

South Dublin Bay SAC [000210] Detailed Conservation Objectives available: ConservationObjectives.rdl (npws.ie)			
Summary of AA			
QI feature	**Conservation Objectives Targets and attributes (summary-inserted)**	**Potential adverse effects**	**Mitigation measures**
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	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. 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.	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.
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		

Overall conclusion: Integrity test

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

Based on the information provided, I am satisfied that adverse effects can be excluded for South Dublin Bay SAC. No wetland habitat loss will occur. Adverse effects from water contamination and sediment release can be effectively prevented by mitigation measures ensuring the protection of the 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 scheme would not delay or prevent the attainment of the Conservation objectives of the South Dublin Bay SAC.

Howth Head SAC [000202] Detailed Conservation Objectives available: ConservationObjectives.rdl (npws.ie)
Bray Head SAC [00714] Detailed Conservation Objectives available: ConservationObjectives.rdl (npws.ie)

Summary of AA

SCI (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 7.1.4.1 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.
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 scheme 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 scheme 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 and Bray 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 the 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 scheme would not delay or prevent the attainment of the Conservation objectives of the Howth Head SAC

Rockabill to Dalkey Island SAC [003000]
Detailed Conservation Objectives available: ConservationObjectives.rdl (npws.ie)

Summary of AA

QI feature	**Conservation Objectives Targets and attributes (summary-inserted)**	**Potential adverse effects**	**Mitigation measures**

Reefs	Maintain favourable conservation condition in relation to habitat area, distribution and community structure.	An accidental pollution event during construction or operation could affect surface water downstream in Dublin Bay. An accidental pollution event of a sufficient magnitude, either along or cumulatively with other pollution sources, could potentially affect the quality (vegetation structure and composition) and area/distribution of intertidal/coastal habitats.	Detailed pollution control measures to protect water quality are outlined within section 7.1.4.1 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.
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.	

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

Based on the information provided, I am satisfied that adverse effects can be excluded for Rockabill to Dalkey Island SAC. No habitat loss will occur. Adverse effects from water contamination and sediment release can be effectively prevented by mitigation measures ensuring the protection of the 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 scheme would not delay or prevent the attainment of the Conservation objectives of the Rockabill to Dalkey Island SAC.

Lambay Island SAC [000204]
Detailed Conservation Objectives available: ConservationObjectives.rdl (npws.ie)

Summary of AA

QI feature	Conservation Objectives	Potential adverse effects	Mitigation measures

	Targets and attributes (summary-inserted)		
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 7.1.4.1 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
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 condition; and human activities should occur at levels that do not adversely affect the species at the site.	**As Above**	

			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 scheme 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 the 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 scheme would not delay or prevent the attainment of the Conservation objectives of the Lambay Island SAC.

Wicklow Mountains SAC [002122]
Detailed Conservation Objectives available: ConservationObjectives.rdl (npws.ie)

Summary of AA

QI feature	Conservation Objectives Targets and attributes (summary- inserted)	Potential adverse effects	Mitigation measures
Lutra lutra (Otter)	To maintain the favourable conservation condition of this species, in terms of distribution, extent of habitat, and no significant increase of barriers to connectivity.	Due to the hydrological distance of the proposed scheme from the SAC being within the range of male otters from QI population of the SAC there is the potential for impacts to arise. An accidental pollution event during construction or operation could affect surface water downstream. Such an event of a sufficient magnitude, either alone or cumulatively with other pollution sources, could potentially affect the otter population through direct contact with pollutants, or a decline in fish prey.	Detailed pollution control measures to protect water quality as outlined in within section 7.4.4 of the NIS. Measures described in Section 7.4.4 of NIS will address disturbance/ displacement impacts of otter.

		Construction disturbance in the vicinity of the watercourses could result in disturbance to and potentially displacement of otter, particularly if works are undertaken at night-time	
Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae) Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or Isoeto-Nanojuncetea Natural dystrophic lakes and ponds Northern Atlantic wet heaths with European dry heaths Alpine and Boreal heaths Calaminarian grasslands of the Violetalia calaminariae Species-rich grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe) Blanket bogs (* if active bog)	Maintain the favourable conservation condition of Oligtrophic waters [3110], Natural dystrophic lakes and ponds [3160], Calaminarian grasslands, across a range of criteria including habitat areas, distribution, and vegetation composition. To restore the favourable conservation condition of Northern Atlantic Wet heaths [4010], European Dry heaths [4030], Alpine and Boreal heaths [4060], species rich Nardus grasslands [6230], blanket Bogs [7130], siliceaous scree of the montane [8110], Calcareous rocky slopes [8210], Sliceous rocky slopes [8220], Old Sessile Oak Woods [91A0], across a range of criteria including habitat areas, distribution, vegetation structure and composition.	As the SAC is located upstream of the Proposed Scheme and at a hydrological distance of approximately 7km, there is no potential for a pollution event of any magnitude to affect any QI habitats or associated plant species for which	None Required

Siliceous scree of the montane to snow levels (Androsacetalia alpinae and Galeopsietalia ladani)			
Calcareous rocky slopes with chasmophytic vegetation			
Siliceous rocky slopes with chasmophytic vegetation			
Old sessile oak woods with Ilex and Blechnum in the British Isles			

Overall conclusion: Integrity test

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

Based on the information provided, I am satisfied that adverse effects can be excluded for Wicklow Mountains SAC. No habitat loss will occur and there is no potential for effects to arise on the designated habitats of the SAC. While the potential for any adverse effects on Otter is low considering the separation distances between the SAC and ranges involved the link is there and this gives rise to the potential for effects. Adverse effects from water contamination and sediment release can be effectively prevented by mitigation measures ensuring the protection of the receiving waters. No increase in existing runoff rates will occur and appropriate treatment will ensure runoff quality. Specific mitigation measures have also been incorporated in order to ensure the protection of otters.

Based on the information provided, I am satisfied that adverse effects can be excluded for **Baldoyle** Bay SAC site in view of conservation objectives of the site.

The proposed scheme would not delay or prevent the attainment of the Conservation objectives of the Baldoyle Bay SAC.

North Bull Island SPA [004006],
Baldoyle Bay SPA [004016],
Malahide Estuary SPA [004025]
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 cSPA (004236)** **The Murrough SPA [004186** **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 AA		
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 SCI 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,
Baldoyle Bay SPA [004016} Light-bellied Brent Goose, Shelduck, Ringed Plover, Golden Plover, Grey Plover, Bar-tailed Godwit		
Summary of AA		
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	As above	As Above
Dalkey Island SPA [004172] Roseate Tern, Common Tern, Artic Tern		
Summary of AA		
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 SCIs for this SPA	As Above	As Above
Howth Head Coast SPA [004113] Kittiwake Rissa tridactyla		
Summary of AA		
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 SCIs for this SPA	As Above	As above
South Dublin Bay and River Tolka Estuary SPA [004024] *Light-bellied Brent Goose (Branta bernicla hrota), Oystercatcher (Haematopus ostralegus), Ringed Plover (Charadrius hiaticula), Grey Plover* (Pluvialis squatarola), Knot (Calidris canutus), Sanderling (Calidris alba), Dunlin (Calidris alpina), Bar-tailed Godwit (Limosa lapponica), Redshank (Tringa totanus), Black-headed Gull (Chroicocephalus ridibundus), Roseate Tern (Sterna dougallii), Common Tern (Sterna hirundo), Arctic Tern (Sterna paradisaea), Wetland and Waterbirds.* **Grey Plover (Pluvialis squatarola)] is proposed for removal from the list of SCI's for the site so no site specific conservation objective is included for the species*		
Summary of AA		
Conservation Objectives Targets and attributes	**Potential adverse effects**	**Mitigation measures**

(summary)		
Long term pop trend stable or increasing Distribution - no significant decrease in range, timing or intensity of use of areas by wintering waterbirds No decline in roosting or breeding colonies . Human activities should occur at levels that do not adversely affect breeding or roosting sites.	As Above	As Above
Irelands Eye SPA [0045117] Cormorant Phalacrocorax carbo, Herring Gull Larus argentatus, Kittiwake Rissa tridactyla, Guillemot Uria aalge, Razorbill Alca torda.		
Summary of AA		
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
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 AA		
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 Habitat area / Hectares /The permanent area occupied by the wetland habitat should be stable and not significantly less than the area of	As above	As Above

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 AA		
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 AA		
Conservation Objectives Targets and attributes (summary)	**Potential adverse effects**	**Mitigation measures**
As Above	As Above	As Above
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 g arctica		
Summary of AA		
Conservation Objectives Targets and attributes (summary)	**Potential adverse effects**	**Mitigation measures**
As Above	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	As Above	As Above in relation to water quality protection.

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.		
North West Irish Sea cSPA (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 (summary)	**Potential adverse effects**	**Mitigation measures**
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.	As above	
The Murrough SPA [004186] Red-throated Diver (Gavia stellata) [A001], Greylag Goose (Anser anser) [A043], Light-bellied Brent Goose (Branta bernicla hrota) [A046], Wigeon (Anas penelope) [A050], Teal (Anas crecca) [A052], Black-headed Gull (Chroicocephalus ridibundus) [A179], Herring Gull (Larus argentatus) [A184], Little Tern (Sterna albifrons) [A195], Wetland and Waterbirds [A999]		
Conservation Objectives Targets and attributes (summary)	**Potential adverse effects**	**Mitigation measures**
To maintain or restore the favourable 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
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 scheme 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 scheme 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 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.

Temporary ex-situ habitat has been shown not to be of significance to the SCIs recorded at these locations and in any case, there will be no loss of suitable inland feeding site.

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

The proposed scheme would not delay or prevent the attainment of the Conservation objectives of any of these SPA sites in Dublin Bay and beyond.

11.3.1 Potential for Adverse effects

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.

It is important to reiterate at this juncture that no works will take place within the boundary of any Natura 2000 site and as such the potential for direct effects does not arise.

In addition to the forgoing, I also consider it important to examine the potential for impacts to arise in relation to noise and vibration disturbance arising from construction works and in relation to Air Quality deterioration arising from both construction works and the operational phase of the development.

11.3.1.1 Noise & Vibration Disturbance

Potential Adverse effects in relation to noise disturbance and vibration have been examined by the applicant within the NIS and are not considered to be likely to give rise to significant adverse effect due to the distance of Natura 2000 sites and known ex-situ sites from the proposed works. Effects would not be expected beyond 150m for mammals such as otter and 300m for wintering birds. It is stated that noise levels arising from construction would attenuate to existing background noise levels at that distance and there are no European sites within the disturbance ZoI of the proposed scheme.

No signs of otter were recorded during field surveys of the proposed scheme, the River Liffey (and its tributaries), the Grand Canal, River Dodder, Brewery Stream, Shanganagh River, Rathmichael Stream, River Dargle and South Dublin Bay (i.e., watercourses within 1km of the Proposed Scheme) are known to support otter. As construction works will typically be undertaken during normal daylight working hours and otter are generally nocturnal in habit and can (in many circumstances) tolerate high levels of human presence and disturbance, displacement of otter from their habitat is extremely unlikely to affect the local otter population. On this basis there will be no significant adverse effect on the SCIs listed and consequently on the conservation objectives of the Wicklow Mountains SPA.

, any otter 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.

11.3.1.2 Air Quality Deterioration

In addition to the foregoing, consideration was given to the potential for adverse effects to occur in relation to habitat degradation as a result of air quality. I note that it is stated within the NIS that the unmitigated ZoI for air quality effects arising from the proposed scheme has the potential to extend 50m from the Proposed scheme boundary, and 500m from construction compounds during the construction phase, and up to 200m the proposed scheme boundary during the operational phase. There are no European sites present within these distances.

11.3.1.3 Habitat loss and Fragmentation

As mentioned previously above the applicant identified two ex-situ locations ,one of which has been excluded due to revisions in the proposed scheme. which were utilised and traversed by Bird Species, listed as SCIs of Malahide Estuary SPA, Baldoyle Bay SPA, Rogerstown Estuary SPA, North Bull Island SPA, South Dublin Bay and River Tolka SPA, Skerries Islands SPA, Ireland's Eye SPA, Lambay Island SPA, North West Irish Sea cSPA and The Murrough SPA. Species include black-headed gull and herring gull.

One site has been discounted given it does not relate to the proposed scheme. The remaining site, at Shanganagh Park were found to support SCI species. The proposed scheme will not result in the loss of habitat suitable to support breeding gull species. Surveys were undertaken to determine the importance of these sites for these species. I note that survey results demonstrated a relatively low frequency of occurrence of SCIs of the aforementioned sites. Low occurrence suggests that these species do not regularly use or rely upon these lands as foraging and/or roosting habitat and are likely to use other suitable sites available in the wider area on a similar or more regular basis. The availability of large areas of suitable foraging and/or roosting habitat for these SCI bird species in the wider locality of the proposed scheme, including those in closer proximity to SPAs ensures that there will be no significant adverse effect on the SCIs listed and consequently on the conservation objectives of the following SPAs, Malahide Estuary SPA, Baldoyle Bay SPA, Rogerstown Estuary SPA, North Bull Island SPA, South Dublin Bay and River

Tolka SPA, Skerries Islands SPA, Ireland's Eye SPA, Lambay Island SPA, North West Irish Sea SPA and The Murrough SPA.

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

The proposed scheme crosses several watercourses, all discharging into the Irish Sea at various locations. Surface waters will also drain to Dublin Bay via existing drainage across the proposed scheme. Dublin Bay contains several European sites. 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.

Therefore, (albeit unlikely) 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, 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, North West Irish Sea cSPA, and, The Murrough SPA.

11.3.1.5 In-Combination Effects

In combination effects are examined within Section 9 of the NIS submitted. The proposed works were considered in combination with all plans and/or projects with the potential to impact upon the European sites outlined above, I have also

considered the North West Irish Sea cSPA in my consideration of in combination effects. Such plans and projects included any national, regional and local land use plans or any existing or proposed projects (that were in place at the time of lodgement of the proposed scheme for the consideration of the Board) that could potentially affect the ecological environment within the ZoI of the Proposed scheme and are listed in Table 37 of the NIS submitted. Each plan and project has been individually considered for any potential in combination effects, these considerations are detailed in table 38 of the NIS submitted.

It is important to note at this juncture that concerns have been raised within the submissions received in relation to the potential for in combination effects with regard to other significant infrastructure projects in and around the city. All such projects have been considered in the context of in combination effects and it is important to note that projects 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; Deansgrange Road Mobility Project; Woodbrook Dart Station and enhancement to Dart Services; the continuation of Metro North to South Dublin and M11/N11 Improvements 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.

In the interest of clarity, it is important to note that all other BusConnects 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 proposed scheme will not give rise to cumulative impacts of any significance.

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.

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.

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 relevant development plan for the areas 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 AA and/or AA, as appropriate.

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.

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

SACs

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

SPAs

- South Dublin Bay and River Tolka Estuary SPA,
- Dalkey Island SPA,
- North Bull Island SPA,
- Baldoyle Bay SPA,
- The Murrough SPA,
- Howth Head Coast SPA,
- Ireland's Eye SPA,

- Malahide Estuary SPA,
- Rogerstown Estuary SPA,
- Lambay Island SPA,
- Skerries Islands SPA and
- Rockabill SPA
- North West Irish Sea cSPA

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.

11.3.2 Mitigation Measures and Monitoring

A summary of mitigation measures is presented in the tables above. Full details are provided in the NIS, CEMP and Invasive Species Management Plan and summarised below. I consider that all measures proposed are implementable and will be effective in their stated aims. Furthermore, where deemed necessary a suitably experienced and qualified ecologist will be employed by the appointed contractor. The ecologist will advise the appointed contractor on ecological matters during construction, communicate all findings in a timely manner to the NTA and statutory authorities, acquire any licences / consents required to conduct the work, and supervise and direct the ecological measures associated with the proposed scheme. A summary of mitigation measures is presented in the table below.

Table 35: Surveys Undertaken	
Measure	Detail
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.
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 related to Otter	Water Quality Measures during construction and operation, confirmatory pre-construction checks and management in accordance with the *Guidelines for the Treatment of Otters prior to the Construction of National Road Schemes (NRA, 2006*), management of excavations and fencing, reduction of lighting

Measures to Prevent the Spread of Non-Native Invasive Species to Downstream European sites	Preconstruction survey, Implementation of an Invasive species management plan and post construction monitoring programme.

11.4 Appropriate Assessment Conclusion: Integrity Test

In screening the need for AA, it was determined that the proposed scheme to upgrade existing bus priority, cycle facilities and pedestrian infrastructure had the potential to result in significant effects on European Sites, and that AA was required in view of the conservation objectives of those sites.

Following a detailed examination and evaluation of the NIS all associated material submitted with the application as relevant to the AA process and taking into account submissions of third parties, I am satisfied that based on the design of the proposed scheme, combined with the proposed mitigation measures, adverse effects on the integrity of:

SACs

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

SPAs

- South Dublin Bay and River Tolka Estuary SPA,
- Dalkey Island SPA,
- North Bull Island SPA,
- Baldoyle Bay SPA,
- The Murrough SPA,
- Howth Head Coast SPA,
- Ireland's Eye SPA,
- Malahide Estuary SPA,
- Rogerstown Estuary SPA,
- Lambay Island SPA,

- Skerries Islands SPA
- Rockabill SPA and
- North West Irish Sea cSPA

can be excluded with confidence in view of the conservation objectives of those sites.

This conclusion is based on the following:

- A detailed assessment of all aspects of the proposed scheme that could result in significant effects or adverse effects on European Sites within a zone of influence of the development site.
- Consideration of the conservation objectives and conservation status of QI habitats and species.
- A full assessment of risks to SCI bird species and QI habitats and species
- Complete and precise survey data and analysis of wintering birds. The proposed scheme 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.
- Application of mitigation measures designed to avoid adverse effects on site integrity and likely effectiveness of same.

The proposed scheme would not undermine the favourable conservation condition of any QI feature or delay the attainment of favourable conservation condition for any QI habitats and species for these European sites.

12.0 Overview of Conditions

It is noted that several parties including the planning authorities, observers and objectors seek the imposition of conditions should the Board be minded to grant planning permission or indeed confirm the compulsory purchase. The Board should note that the conditions do not raise any significant issues in relation to the route or principle of the proposed scheme and were largely focused on detailed design issues.

The majority relate to the continued engagement between the applicant and planning authority or landowner/occupier. It is noted that the NTA intend to continue collaboration in advance of, and during, the subsequent construction stage. Construction works will therefore be carried in consultation with the planning authority, owner/occupiers the community generally, as the case may be. There will also be continued engagement with owner/occupiers under the CPO process also and specific agreements will need to be made in this regard.

A number of the conditions that the planning authorities 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

DCC alone, in Appendix 1 of their submission, request a total of approximately seventy-eight individual conditions which are collated from the various departments in the planning authority. Seventy-eight conditions in of itself and regardless of the complexity of the proposed scheme is onerous and would not be practical to enforce. While they are entirely legitimate conditions and are generally acceptable, I note that the applicant has stated that additional specification conditions are not required and are largely covered by mitigation measures proposed.

Overall, I am satisfied that proposed scheme shall be carried out and completed in accordance with the plans and particulars lodged with the application as recommended in Condition 1. Furthermore, under the recommended Condition 3 the applicant will be required to follow through on all mitigation, environmental commitments and monitoring measures identified in the EIAR, NIS and any other supporting document. Such mitigation, environmental commitments and monitoring

measures covers the principle issues in the requests for conditions and there is no requirement to transpose individual mitigation measures into conditions to satisfy individual departments of the planning authorities. These related to detailed measures such as drainage, methodologies for conservation and recording and carrying out works around heritage receptors, traffic management, agreement on detailed design features, reinstatement works and standards to be adopted However, the local authorities should be in no doubt that they hold the power to enforce Condition 3 should it be required.

Where I am not satisfied that the applicant has covered the request of the planning authority, these have been incorporated into a consolidated schedule of conditions below which seek to merge planning authority requests. I note in relation to the carrying out of works to and in the vicinity of natural and built heritage features that both DLRCC and DCC have specialist conservation, landscape, biodiversity and architectural departments. These departments have detailed local expertise and considering their development management and planning functions, I consider it appropriate to ensure the NTA engage with them. Therefore, it is important, having regard to the nature and scale of the project and the particular built and natural heritage features which are being impacted, that a condition be applied to ensure the efficacy of the recording, preservation, protection, and reuse, replacement and retention methodologies where relevant.

Individual owner/occupiers have sought very specific conditions in respect of their properties including how and when reinstatement should occur. One example being that the Woodbrook Side Lodge be rebuilt within one year of its demolition. I do not consider such bespoke conditions necessary, however the observer and objector at relevant properties should continue to engage with the applicant directly with the NTA to agree construction timeframes, approaches to replanting and reinstatement.

The Board will note Condition 2 which seeks to bring into effect minor changes in the design of the scheme at Shanganagh Park and Cemetery. This changes while minor, will bring improve pedestrian safety through introduction of a pedestrian crossing for Shanganagh Park and Cemetery where a retained bus stop serving the park and cemetery will serve a clear desire line to these community facilities. The lack of pedestrian crossings results in users of the bus stop having to travel a distance of 250 meters of either side of Shanganagh Park. It would be remiss in my opinion, in the interest of safety, not provide such a facility on the basis of the scheme's reputed

objectives. I am satisfied the proposed change being requested by condition above are minor in nature and do not require a further information request. The changes would not materially change the outcome of the EIA or AA below. The condition is not required for the purposes of mitigation of any environmental impacts.

Within the report I had raised specific issues and suggested where design did not entirely meet the design principles and had deviated from DMURS or the Cycle Manual as the case may be. I have not recommended conditions in this regard given they are matters of detailed design or the applicant has good justification for the design as proposed. However, should the Board remain concerned about these issues a condition could be attached, in the interest of safety. However, the Board should satisfy itself of the resultant traffic and transport impacts which in turn could alter other assessment in the EIAR. Suggested changes include:

- the removal of a left-turn slip lane inbound at Adelaide Road.
- the introduction of vertical and horizontal and vertical deflections at a number of junctions which promote lower design speeds, slow turning vehicles at junctions and enable pedestrians to cross the street with greater priority.
- the introduction of a cycle link at the Hill in Stillorgan for inbound cyclists seeking to access Stillorgan Village which is an existing desire line for cyclists.
- the introduction of a more direct cycle link at the Wyattville Spiral Ramp, Wyattville Link Road and Cherrywood Road which at present may be incoherent, indirect and unattractive for users.

In making a decision, the Board may consider that additional facilities as set out are unwarranted given the number of such changes proposed throughout the scheme and that there is sufficient connectivity for cyclists and pedestrians. This would be a reasonable conclusion.

The Board will note Condition 21, 22 and 23 in respect of landscape (townscape) & visual including trees and walls. This is in direct response to relevant sections of the local authorities who are concerned how, in particular, trees and heritage walls, will be treated. The impacts have been thoroughly considered above and are considered acceptable. However, such a condition doubles down on the requirements set out in the supporting documentation and ensures input from the competent experts of the local authorities who have local knowledge and can contribute meaningfully to the construction of the proposed scheme - particularly where removal is required. It will

also ensure monitoring and supervision by a qualified specialists during construction and operation phases.

The conditions sought by the DHLGH in respect of archaeology, bat surveys, tree removal, protection of species and implementation of the CEMP have been incorporated into relevant conditions or an explicit in the mitigation measures proposed by the applicant.

The TII request that any crossing or interaction with the national road network must include prior consultation with TII to ensure compliance with TII Publications. This is reasonable and included for in Condition 4 and the preparation of the CEMP. To identify potential safety and queuing impacts in respect of national roads, a monitoring plan should be established during construction under Condition 10.

All other conditions are considered standard to the granting of this planning permission and typically apply during the construction phase to protect relevant receptors and environmental factors such as traffic, air, noise biodiversity, water, archaeology, architectural heritage.

13.0 Recommendation

It is recommended that the Board grant planning permission for the proposed scheme on the basis of the reasons and considerations below and subject to the following conditions.

14.0 Reasons and Considerations

In coming to its decision, the Board had regard to the following:

- European legislation, including of particular relevance:
    - The relevant provisions of EU Directive 2014/52/EU amending Directive 2011/92/EU (EIA Directive) on the assessment of the effects of certain public and private projects on the environment,
    - 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, and
    - Sustainable and Smart Mobility Strategy 2020 (EU Commission 2020).
- National planning and related policy, including:
    - the Climate Action Plan 2024,
    - the National Development Plan 2021-2030,
    - Project Ireland 2040 National Planning Framework,
    - the Department of Transport National Sustainable Mobility Policy, 2022,
    - the Design Manual for Urban Roads and Streets, 2019,
    - the Cycle Design Manual, 2023, and
    - other relevant guidance documents,
- Regional level policy, including:
    - the Greater Dublin Area Transport Strategy 2022-2042,
    - Regional Spatial Economic Strategy for the Eastern and Midlands Region
- local planning policy, including:
    - Dublin City Development Plan 2022-2028,
        - Dublin City Biodiversity Action Plan 2021-2025,
        - Draft Dublin City Centre Transport Plan 2023,
    - Dún Laoghaire-Rathdown County Development Plan 2022-2028
        - Dún Laoghaire-Rathdown County Biodiversity Action Plan 2021-2025,
        - Dún Laoghaire-Rathdown County Trees and Urban Forestry Strategy 2024-2030,
        - Stillorgan - Local Area Plan 2018 – 2024 as extended
        - Woodbrook - Shanganagh LAP 2017-2023 as extended

    - Wicklow County Development Plan 2022-2028
        - Wicklow County Council Tree Management Policy 2022
        - Bray Municipal District Local Area Plan 2018-2024
- the nature, scale and design of the proposed scheme as set out in the planning application and the pattern of development in the vicinity,
- the entirety of the documentation submitted by the National Transport Authority (applicant) in support of the proposed scheme, including the Environmental Impact Assessment Report and the Natura Impact Statement, and the range of mitigation and monitoring measures proposed,
- the submissions made to An Bord Pleanála in connection with the planning application,
- the likely consequences for the environment and the proper planning and sustainable development of the area in which it is proposed to carry out the proposed scheme and the likely significant effects of the proposed scheme on European Sites, and
- the report and recommendation of the Inspector, including the examination, analysis and evaluation undertaken in relation to appropriate assessment and environmental impact assessment.

It is considered that the proposed scheme 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.

Proper Planning and Sustainable Development

It is considered that the proposed scheme 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 South Dublin Bay SAC, Bray Head SAC, Rockabill to Dalkey Island SAC, North Dublin Bay SAC, Wicklow Mountains SAC, Howth Head SAC, Lambay Island SAC, South Dublin Bay and River Tolka Estuary SPA, Dalkey Island SPA, North Bull Island SPA, Baldoyle Bay SPA, The Murrough

SPA, Howth Head Coast SPA, Ireland's Eye SPA, Malahide Estuary SPA, Rogerstown Estuary SPA, Lambay Island SPA, Skerries Islands SPA, Rockabill SPA and North West Irish Sea cSPA are the European sites for which there is a likelihood of significant effects.

The Board considered the Natura Impact Statement and all other relevant submissions and carried out an appropriate assessment of the implications of the proposed scheme for the South Dublin Bay SAC, Bray Head SAC, Rockabill to Dalkey Island SAC, North Dublin Bay SAC, Wicklow Mountains SAC, Howth Head SAC, Lambay Island SAC, South Dublin Bay and River Tolka Estuary SPA, Dalkey Island SPA, North Bull Island SPA, Baldoyle Bay SPA, The Murrough SPA, Howth Head Coast SPA, Ireland's Eye SPA, Malahide Estuary SPA, Rogerstown Estuary SPA, Lambay Island SPA, Skerries Islands SPA, Rockabill SPA and North West Irish Sea cSPA 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 proposed scheme both individually or in combination with other plans or projects, specifically upon the South Dublin Bay SAC, Bray Head SAC, Rockabill to Dalkey Island SAC, North Dublin Bay SAC, Wicklow Mountains SAC, Howth Head SAC, Lambay Island SAC, South Dublin Bay and River Tolka Estuary SPA, Dalkey Island SPA, North Bull Island SPA, Baldoyle Bay SPA, The Murrough SPA, Howth Head Coast SPA, Ireland's Eye SPA, Malahide Estuary SPA, Rogerstown Estuary SPA, Lambay Island SPA, Skerries Islands SPA, Rockabill SPA and North West Irish Sea cSPA

and

- Mitigation measures which are included as part of the current proposed scheme,
- Conservation Objective for these European Sites, and
- 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 scheme 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 scheme, 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.

Environmental Impact Assessment

The Board completed an environmental impact assessment of the proposed development, taking into account:

- the nature, scale, location, and extent of the proposed development,
- the Environmental Impact Assessment Report and associated documentation submitted with the application,
- the submissions received during the course of the application, and
- the Inspector's report

The Board considered that the Environmental Impact Assessment Report, supported by the documentation submitted by the applicant, adequately considers alternatives to the proposed development, and identifies and describes adequately the direct, indirect, secondary, and cumulative effects of the proposed development on the environment. The Board agreed with the examination, set out in the Inspector's report, of the information contained in the Environmental Impact Assessment Report and associated documentation submitted by the applicant and submissions made during the course of the planning application.

Reasoned Conclusion

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 scheme 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 scheme 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 scheme will have a significant positive effect on human health and population due to the displacement of CO2 from the atmosphere arising from an increased use of public transport which will be electrified and the reduction of cars on the route. Negative impacts during construction relate to the embodied carbon of construction materials which will have a negative significant impact but for the short term, any increase in carbon is considered significant, however the construction phase represents a significantly small percentage of the sectoral emission ceilings outlined in CAP 23 for the 2021-2025 carbon budget period, the proposed scheme represents 0.087% 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 scheme on the environment would be primarily mitigated by environmental management measures, as appropriate.

Having regard to the above, the Board is satisfied that the proposed scheme 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.

Conditions

Plans and Particulars

1. The proposed scheme 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 scheme shall be carried out in accordance with the agreed particulars.
Reason: In the interest of clarity.

2. The proposed scheme shall be amended and provided for in accordance with the details set out below. Revised plans shall be submitted for the written agreement of the Planning Authority prior to the commencement of development which provide for appropriate pedestrian facilities at the junction of Dublin Road and Shanganagh Park and Cemetery to facilitate west-east crossings from the retained bus stop opposite the entrance to the park and cemetery, in the interest of orderly development and pedestrian safety. Revised drawings showing compliance with these requirements shall be submitted to the relevant planning authority for written agreement prior to the commencement of development where stated and the works carried out in accordance with the revised agreed details.
Reason: In the interests of clarity, orderly development and road safety.

3. (a) All mitigation, environmental commitments and monitoring measures identified in the EIAR shall be implemented in full as part of the proposed scheme.
(b) All mitigation, environmental commitments and monitoring measures identified in the Natura Impact Statement shall be implemented in full as part of the proposed scheme.
Reason: In the interest of development control, public information, and clarity.

4. Prior to the commencement of development, the developer, and/or any agent acting on its behalf, shall prepare in consultation with the relevant statutory agencies, an updated Construction Environmental Management Plan (CEMP), Construction Traffic Management Plan and Construction Stage Mobility Management Plan incorporating all mitigation measures indicated in the Natura Impact Statement and Environmental Impact Assessment Report and a demonstration of proposals to adhere to best practice and protocols. 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.

The construction of the development shall be managed in accordance with the Construction and Environmental Management Plan. This plan shall provide details of intended construction practices for the development, including:

a. Location of the site and materials compound(s) including area(s) identified for the storage of construction refuse.
b. Location of areas for construction site offices and staff facilities.
c. Details of lighting, site security fencing and hoardings.
d. Details of the timing and routing of construction traffic to and from the construction site.
e. Measures to prevent the spillage or deposit of clay, rubble or other debris on the public road network.
f. Alternative arrangements to be put in place for pedestrians, cyclists and vehicles in the case of the closure of any public road or footpath during the course of site development works.
g. Details of appropriate mitigation measures for noise, dust and vibration, and monitoring of such levels.
h. Containment of all construction-related fuel and oil within specially constructed bunds to ensure that fuel spillages are fully contained.
i. Off-site disposal of construction/demolition waste and details of how it is proposed to manage excavated soil.
j. Means to ensure that surface water run-off is controlled such that no silt or other pollutants enter local surface water sewers or drains.
k. Consultation with the respective Regional Waste Management Planning Office regarding development of the final plans.

A record of daily checks that the works are being undertaken in accordance with the Construction Management Plan shall be kept for inspection by the planning authority.
Reason: In the interest of amenities, public health and safety

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. 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 scheme.
   Reason: In the interest of environmental protection and public health.

7. 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.

8. 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.

9. (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.

Traffic and Transport

10. 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 and Transport Infrastructure Ireland (in the case of a national roads and motorways) on a weekly basis.
    Reason: In the interest of orderly development.

Noise and Vibration

11. 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.

Biodiversity

12. All works shall be monitored by an Ecological Clerk of Works or Ecologist. Where appropriate, monitoring shall be undertaken by specialists. Monitoring schedules shall be included in Site Specific Habitats Protection and Re-instatement Method Statements.
    Reason: In the interest of environmental protection.

13. 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.

14. 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.

15. 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.

16. 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.

17. 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.

18. No ground clearance shall be undertaken and no vegetation shall be cleared the bird breeding season from the 1st day of March to 31st day of August during, unless otherwise agreed with the local authority.
    Reason: In the interest of local biodiversity.

Archaeological and Cultural Heritage

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 and monitoring shall be carried out in accordance with the details specified within the Environmental Impact Assessment Report submitted with the application

    Reason: In order to conserve the archaeological heritage of the site and to secure the preservation and protection of any remains that may exist within the site.

Architectural Heritage

20. All works to protected structures and structures of 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 structures of heritage interest shall be made known to the relevant section of the planning authority for the area as soon as is practicably possible.
    Reason: In the interest of environmental protection

Landscape (Townscape) & Visual including Trees and Walls

21. The site shall be landscaped in accordance with the comprehensive scheme of landscaping submitted. Final details of which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development, including details on:
    a. Existing trees, hedgerows, shrubs, walls, specifying which are proposed for retention.
    b. The measures to be put in place for the protection of these landscape features during the construction period. Tree protection measures for all existing trees shall be put in place prior to the commencement of development or phases of development.
    c. The species, variety, number, size and, details and locations of all proposed trees and shrubs and walls prior to implementation.
    d. Hard landscaping works, specifying surfacing materials, furniture, play equipment (if any) and finished levels.
    e. A timescale for implementation

    All planting shall be adequately protected from damage until established. Any plants which die, are removed or become seriously damaged or diseased, within a period of five years from the completion of the development or until the development is taken in charge by the local authority, whichever is the sooner, shall be replaced within the next planting season with others of similar size and species, unless otherwise agreed in writing with the planning authority.

Reason: In the interest of residential and visual amenity.

22. 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 measures related to tree and landscaping works are implemented appropriately.
    Reason: In the interest of environmental protection

23. Prior to the removal of trees, hedging and planting the NTA shall agree with the relevant landowner (which may include the local authority for the area) the species, size and location of all replacement vegetation.
    Reason: In the interest of visual and residential amenity.

Professional Declaration

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.

_____

Tomás Bradley,

Senior Planning Inspector

20th November 2024

Appendix A: Observations of October 2023

Observations of October 2023
Angela O'Sullivan
Aeval Unlimited Company
Aidan Byrne
Alan Ashe
Alison, Mark, Leya & Esme Fallon
Andrew McNamee & Fernanda De Sousa
Andrew Peet & Others
Anna O'Laughlin
Anne & Cormac O'Donohue
Anne Austin
Anne Marie Murtagh
Anne O'Gorman Weber
Aoibhinn Maloney & Others
Aoife & Roman Hayes
Aoife Stokes & Glenn Mason
Aoife Sweeney
AWC Estate Owners Company Clg
Barry Wallace
Bastille Realty Limited
Beechfield Manor Nursing Home Ltd.
Blathin O'Shea
Bray Retailers Group (BRG)
Brendan Dunne
Brendan Heneghan
Brian Hannon and Sinead Ni Argain
Brian Holland
Bridin Hegarty
Carol Scott
Celeste Golden
Celine Smyth
Chris Horn
Ciaran Cuffe MEP
Circle K Bray
Circle K Donnybrook
Claire Scott-Lennon
Cllr. Carrie Smyth
Cllr. Kate Ruddock c-o County Hall
Cllr. Martha Fanning
Cllr. Michael D. Clark & Others
Coakley O'Neill Town Planning
Colette Harold & Tom Bebbington
Conor Gerard Maher
Cora Corbawn Residents Association
Cora Plant & D'OMuirthile
Councillor Joe Behan
Councillor Marie Baker
Courtenay Pollard
Damien & Bernda MacKenna & Others
Dara Byrne
David & Joanne McKenna
David & Mary Reidy
David and Eana Bernie
David Bowman
David Lawlor

Deirdre Spillane & Jason O'Sullivan
Denis & Trish Hosford
Derek & Deirdre McCann
Dermot & Anne Grumley
Dervila Cooke
Development Applications Unit
Donagh O'Doherty
Donnybrook Fair Limited
Dorothee Corrigan
Dr. Dermot Strokes
Dublin City Council
Dublin Commuter Coalition
Dún Laoghaire-Rathdown County Council
Eamon Griffith
Edmund Rice Schools Trust Limited
Edward and Noirin Gahan
Elizabeth Ryder
Enda Gavin
Eoin Conway and Helen Clarke
Esmond Green
Eugene Ryan
Eve & Ian McAulay
Fergus McCarthy
Fiachra Baynes & Sinead Lucey
Fiona Bennett & Brendan Dunne
Fiona Connor
Fionnuala & Noel Gilchrist
Four Star Pizza c-o Peadar Smyth
Fr. Michael O'Sullivan SAC, PP
Frances Healy and Others
Frank and Trudy Scott-Lennon
Gavin Doherty
Gerald Kennedy
Geraldine Comiskey
Gerard McCormick
Gerry Cosgrave
Gill Owens & Others
Grant White & Darina Bewley
Gregory Gallagher
Gregory O'Brien
Gwen & John Downing
Helen Griffin
Helen Ronayne
Ina Knerr
Ivana Bacik TD
Jacqueline Kennedy
Jade Garica Webber
James & Victoria Fahey
James Bergin
Jamie McKeown & Beatice Journee
Jane & John Deehan
Jill & John Bolton
Jo Armstrong
John Barron
John Cullen & Sandra Cullen
John Healy
John Hickie
John Kane
Karl Troy

Kathleen Lee
Kennedy Wilson & Kennedy Wilson Investments
Kim & Fintan McAlinden
Kingsley Hogan
Kylie O'Grady & Carl Faichney
Louise O'Reilly & Others
Maeve Muckian
Mairead Divilly
Mandabard Holding Ltd.
Marian Ward
Mark & Christine Russell
Mark Anderson
Martin D. Bermon
Mary Foran
Maura Harmon
MCL Estates Ltd - Fast Fit Tyres
MCL Estates Ltd - First Stop
Melcorpo Commercial Properties Unlimited
Melcorpo Commercial Properties Limited
Michael & Sophie Whelan
Michael Greene
Michael Philps
Michael Roberts
Michelle Salter
MOLA Architecture
Monica Glynn & Wiliam Cleary
Musgrave Limited
Natasha Hogan
Nigel Kenning
Nina and Peter Brennan
Nuala Weber
Oksana Marchenko
Orla & Tom Wilson
Orla Cooke
Padraic & Anna Costello
Pam Robinson
Patricia Beales and Pamela Donlan
Patricia McKeever
Patrician Residents Association
Patrician Community Centre
Patrick O'Connell
Paul Cullen
Paul Deery and Michael Fitzgerald
Paul Wilcock
Paula Whelan & Roy Parker
Pauline Fogarty
Peadar Ward
Pearse Nolan
Philomena O'Riordan
Pola Finegan
Professor Patrick Davey
Rathmichael National School
Rathmichael Parish School
Rathmichael Residents Association
Rayna Cooney & Owen Tighe
Redmond & Judith O'Leary
Redrock Donnybrook Ltd
Religious Sisters of Charity
Residents of South Park

Richard Noonan
Rod and Mary Allsop
Ross Lawless & Lisa Kenny
Roy Parker
Ruth Kennedy
Ruth Stewart
Sandra Maguire
Sarah & Peter Brennan
Sean Leavy
Senator Barry Ward
Shamrock Hill Mgmt. Ltd.
Shane Gethings
Shangan Marble & Stone Centre
Shankill Community Action
Shankill Tidy Towns c-o Eoin McBennett
Sharon & Nigel Rogers
Shekur Bonomally
Simon Geelon
Siobhan Mac Cobb
Sir Marc Cochrane
Sophie Wynne-Evans
Stephen & Marie Hedderman
Stephen & Patricia Kelly
Susan & Gareth Fanning
Suzanne Cook
Teresa Deering
Terroirs
The Congregation of Christian Brothers
The Donnybrook Partnership
Tom Wade
Tony & Marian Hearne
Twomey Supermarket Limited
Transport Infrastructure Ireland
Tricia McGrath
Trustees of St. James Church
Una Bannon
Violet Doherty
Wicklow County Council (Enterprise)
Wicklow County Council (Roads)
William Riordan
Willow Park Residents
Windsor Motors
Yongjing Xie
Zoe Stephenson & Adam Wong
Note: Prescribed Bodies highlighted in grey.

Appendix B: Observations of July 2024

Observations of July 2024
Andrew Peet & Others
Angela O'Sullivan
Brendan Heneghan
Cara Corbawn Residents Association
Carol Scott
Céleste Golden
Chris Horn
Circle K Bray
Circle K Donnybrook
Colette Harold & Tim Bebbington
Conor Gerard Maher
Cora Plant & D O'Muirthile
Courtenay Pollard
Damien and Berna MacKenna and Others
Denis & Trish Hosford
Derek & Deirdre McCann
Esmond Greene
Eve and Ian McAulay
Gerard McCormick
Gregory O'Brien
Helen Griffin
Martin D. Bernon (Ferndale Lodge)
Michael Greene
Monica Glynn & William Cleary
Nina & Peter Brennan
Philomena O'Riordan
Pola Finnegan
Shankill Community Action
Shankill Tidy Towns c/o Eoin McBennett
Siobhan Mac Cobb
Suzanne Cook
Una Bannon
Willow Park Residents (Barry Rojack)
Dara Byrne
David and Mary Reidy
Dr. Dermot Stokes
Ina Knerr
Kingsley Hogan
Ruth Kennedy
Stephen & Patricia Kelly
Transport Infrastructure Ireland (TII)
Bastille Realty Limited
Frank & Trudy Scott-Lennon
Professor Patrick Davey
Rathmichael National School (c/o Diocesan Board of Education)
Bray Retailers Group (BRG)
Claire Scott-Lennon
Councillor Joe Behan
Deirdre Spillane and Jason O'Sullivan
Eoin Conway and Helen Clarke
Four Star Pizza c/o Peadar Smyth
Paula Whelan and Roy Parker
Peadar Ward
Trustees of St James Church, c/o Robert Thompson
Andrew McNamee and Fernanda De Sousa

Kathleen Lee
Louise O'Reilly & Others
Orla Cooke
Pam Robinson
Patrician Community Centre
Patrician Residents Association (Pam Robinson)
Paul Deery and Michael Fitzgerald
Pauline Fogarty
Rayna Connery & Owen Tighe
Jacinta O'Sullivan and Seán Ó Raghallaigh
Maeve Muckian
Mark Anderson
Nigel Kenning
Teresa Deering
Tom Wade
Blathin O'Shea
David Lawlor
Grant White & Darina Bewley
Anne & Cormac O'Donohoe
Ross Lawless & Lisa Kenny
Sophie Wynne-Evans
Dún Laoghaire Rathdown County Council
Sir Marc Cochrane
Fergus McCarthy
Sharon & Nigel Rogers
Geraldine Comiskey
David and Eana Bernie
Michael Roberts
Maura Harmon
Donagh O'Doherty
Elizabeth Ryder
Note: Prescribed Bodies highlighted in grey.