



Project Ireland 2040
Building Ireland's Future

NTA Observations on the Proposed Scheme Submissions and CPO Objections

Belfield/Blackrock to City Centre Core Bus Corridor Scheme

National Transport Authority

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Contents

1.	Introduction	14
1.1	Introduction	14
1.2	Overview of Submissions and Objections Received	14
2.	Response to Submissions on Proposed Scheme	17
2.1	Proposed Scheme on Nutley Lane	17
2.1.1	Description of Proposed Scheme at this Location	17
2.1.2	Overview of Submissions Received	18
2.1.3	Common Issues Raised	19
2.2	Proposed Scheme on Pembroke Road	42
2.2.1	Description of Proposed Scheme at this Location	42
2.2.2	Overview of Submissions Received	48
2.2.3	Common Issues Raised	48
2.3	Proposed Scheme on Baggot Street Upper	67
2.3.1	Description of Proposed Scheme at this Location	67
2.3.2	Overview of Submissions Received	72
2.3.3	Common Issues Raised	72
2.4	Whole Scheme	89
2.4.1	Overview of Submission	89
2.4.2	31 – Dún Laoghaire-Rathdown County Council	89
2.4.3	42 – Brendan Heneghan	117
2.4.4	29 – Dublin Commuter Coalition	125
2.4.5	30 – Dublin Cycling Campaign	137
2.4.6	24 – Development Applications Unit	151
2.4.7	28 – Dublin City Council	153
3.	Response to Objections to the Compulsory Purchase Order (CPO)	185
3.1	Overview of Objections	185
3.2	Responses to Individual CPO Objections	186
3.2.1	CPO1 - 1 Merrion Land Limited (133-145 Merrion Road)	186
3.2.2	CPO2 - Blackrock Clinic	189
3.2.3	CPO3 - Blue Infinity PropCo. Limited	199
3.2.4	CPO4 - Blackrock College	203
3.2.5	CPO5 - BreastCheck Merrion St. Vincent's University Hospital (SVUH)	208
3.2.6	CPO6 - Dalata Hotel Group Plc	211
3.2.7	CPO7 - Draper Rhoda	215
3.2.8	CPO8 - Elm Court Management DAC	219
3.2.9	CPO9 - Elm Park Golf and Sports Club	225
3.2.10	CPO10 - Elmpark Green Development	237
3.2.11	CPO11 - Farrell Caroline	241
3.2.12	CPO 12 - Freeman Veronica	245
3.2.13	CPO 13 - Gas Networks Ireland	250
3.2.14	CPO 14 - Harrison Anthony	255
3.2.15	CPO 15 - Lamtos Unlimited Company – Merrion House	259
3.2.16	CPO 16 - Long Helen	264
3.2.17	CPO 17 - Management Company 31 – 33 Merrion Road CLG	268
3.2.18	CPO 18 - McGivern Shauna	270
3.2.19	CPO 19 - Quinn Laura	276
3.2.20	CPO 20 - Salinger Richard	281
3.2.21	CPO 21 - Tesco Ireland Limited	283
3.2.22	CPO 22 - Vaughan Eileen	290
3.2.23	CPO 23 - Wappinger Food Corporation Limited	298

4.	Responses to Individual Submissions on the Proposed Scheme	303
4.1	01 – Ailesbury Road Resident’s Association	303
	4.1.1 Submission – Ailesbury Road	303
	4.1.2 Response to submission	303
4.2	02 – Aviva Life and Pensions Ireland DAC	304
	4.2.1 Submission	304
	4.2.2 Response to submission	304
4.3	03 – Bailey J W	305
	4.3.1 Submission – Pembroke Road	305
	4.3.2 Response to submission	305
4.4	04 – Blackrock Clinic	305
	4.4.1 Submission – Blackrock Clinic	305
	4.4.2 Response to submission	306
4.5	05 – Bowles Michael P.	306
	4.5.1 Submission – Baggot Street	306
	4.5.2 Response to submission	306
4.6	06 – Bowles Patrick	307
	4.6.1 Submission – Baggot Street	307
	4.6.2 Response to submission	307
4.7	07 – Bradly David and Cooney Marie-Therese	307
	4.7.1 Submission – Nutley Lane	307
	4.7.2 Response to submission	307
4.8	08 – Brereton Hilda and Brian P.	307
	4.8.1 Submission – Nutley Lane	307
	4.8.2 Response to submission	308
4.9	09 – Brophy David	308
	4.9.1 Submission – Nutley Lane	308
	4.9.2 Response to submission	308
4.10	10 – Byrne Liam and Mary and Others	308
	4.10.1 Submission – Nutley Lane	308
	4.10.2 Response to submission	308
4.11	11 – Byrne Patrick	309
	4.11.1 Response to submission	309
4.12	12 – Calvert John and Emma	309
	4.12.1 Submission – Nutley Lane	309
	4.12.2 Response to submission	310
4.13	13 – Cavanagh Maurice	310
	4.13.1 Submission – Pembroke Road	310
	4.13.2 Response to submission	310
4.14	14 – Collins Breda	310
	4.14.1 Submission – Nutley Lane	310
	4.14.2 Response to submission	311
4.15	15 – Comaskey Anthony and Others	311
	4.15.1 Submission – Baggot Street Upper	311
	4.15.2 Response to submission	311
4.16	16 – Conroy Patricia	311
	4.16.1 Submission – Baggot Street Upper	311
	4.16.2 Response to submission	311
4.17	17 – Corcoran Declan	312
	4.17.1 Submission – Nutley Lane	312
	4.17.2 Response to submission	312
4.18	18 – Cotter Colette	312

	4.18.1	Submission – George’s Avenue	312
	4.18.2	Response to submission	312
4.19		19 – Coughlan Anthony	313
	4.19.1	Submission – Pembroke Road	313
	4.19.2	Response to submission	314
4.20		20 – Cllr Marie Baker	315
	4.20.1	Submission – George’s Avenue	315
	4.20.2	Response to submission	315
4.21		21 – Dalata Hotel Group Plc	317
	4.21.1	Overview of Submission	317
	4.21.2	Response to submission	317
4.22		22 – Deane James	317
	4.22.1	Submission – Baggot Street Upper	317
	4.22.2	Response to submission	318
4.23		23 – Dee Marion	318
	4.23.1	Submission – Nutley Lane	318
	4.23.2	Response to submission	318
4.24		24 – Development Applications Unit	318
	4.24.1	Summary of Submission	318
	4.24.2	Response to submission	319
4.25		25 – Dineen Mark and Mary	319
	4.25.1	Submission – Baggot Street Upper	319
	4.25.2	Response to submission	319
4.26		26 – Dorman John and Others	319
	4.26.1	Submission – Pembroke Road	319
	4.26.2	Response to submission	320
4.27		27 – Doyle Stephen	320
	4.27.1	Submission – Pembroke Road	320
	4.27.2	Response to submission	320
4.28		28 – Dublin City Council	320
	4.28.1	Submission – Whole Scheme	320
	4.28.2	Response to submission	320
4.29		29 – Dublin Commuter Coalition	321
	4.29.1	Submission – Whole Scheme	321
	4.29.2	Response to submission	321
4.30		30 – Dublin Cycling Campaign	321
	4.30.1	Submission – Whole Scheme	321
	4.30.2	Response to submission	322
4.31		31 – Dún Laoghaire-Rathdown County Council	322
	4.31.1	Submission – Whole Scheme	322
	4.31.2	Response to submission	322
4.32		32 – Dunne Geraldine	322
	4.32.1	Submission – Baggot Street Upper	322
	4.32.2	Response to submission	323
4.33		33 – Elm Court Management DAC	323
	4.33.1	Submission – Merrion Road	323
	4.33.2	Response to submission	324
4.34		34 – Elm Park Golf and Sports Club	324
	4.34.1	Submission – Nutley Lane	324
	4.34.2	Response to Objection Raised	325
4.35		35 – Elmpark Green Development	325
	4.35.1	Submission – Merrion Road	325

	4.35.2	Response to submission	326
4.36		36 – Frame Geraldine and David	326
	4.36.1	Submission – Nutley Lane	326
	4.36.2	Response to submission	326
4.37		37 – Gallagher Conor	326
	4.37.1	Submission – Pembroke Road	326
	4.37.2	Response to submission	327
4.38		38 – Gilmartin Kieran	327
	4.38.1	Submission – Other	327
	4.38.2	Response to submission	327
4.39		39 – Halpenny Patrick	329
	4.39.1	Submission – Nutley Lane	329
	4.39.2	Response to submission	329
4.40		40 – Harte Aidan	329
	4.40.1	Submission – Baggot Street Upper	329
	4.40.2	Response to submission	329
4.41		41 – Harte Bronagh	329
	4.41.1	Submission – Baggot Street Upper	329
	4.41.2	Response to submission	329
4.42		42 – Heneghan Brendan	330
	4.42.1	Submission – Whole Scheme	330
	4.42.2	Response to submission	330
4.43		43– Hoey Bridget	330
	4.43.1	Submission – Baggot Street Upper	330
	4.43.2	Response to submission	330
4.44		44 – Hoey Daniel J.	330
	4.44.1	Submission – Baggot Street Upper	330
	4.44.2	Response to submission	331
4.45		45 – Hoey Eamon	331
	4.45.1	Submission – Baggot Street Upper	331
	4.45.2	Response to submission	331
4.46		46 – Hough Hilary and Rosemary	331
	4.46.1	Submission – Nutley Lane	331
	4.46.2	Response to submission	332
4.47		47 – Kavanagh Liam	332
	4.47.1	Submission – Nutley Lane	332
	4.47.2	Response to submission	332
4.48		48 – Keaveney Andrew	332
	4.48.1	Submission – Pembroke Road	332
	4.48.2	Response to submission	333
4.49		49 – Kelly John	333
	4.49.1	Submission – Baggot Street Upper	333
	4.49.2	Response to submission	333
4.50		50 – Kelly Margaret	333
	4.50.1	Submission – Nutley Lane	333
	4.50.2	Response to submission	333
4.51		51 – Kierwan Georgina	334
	4.51.1	Submission – Baggot Street Upper	334
	4.51.2	Response to submission	334
4.52		52 – Langkawi Malaysian Restaurant	334
	4.52.1	Submission – Baggot Street Upper	334
	4.52.2	Response to submission	334

4.53	53– Lillis Sarah and Stephen	334
	4.53.1 Submission – Nutley Lane	334
	4.53.2 Response to submission	335
4.54	54 – Little Ross	335
	4.54.1 Submission – Baggot Street Upper	335
	4.54.2 Response to submission	335
4.55	55 – Magrath Mary	335
	4.55.1 Submission – Nutley Lane	335
	4.55.2 Response to submission	335
4.56	56 – Mahon Paul	335
	4.56.1 Submission – Other	335
	4.56.2 Response to submission	336
4.57	57 – Mathews Clare	339
	4.57.1 Submission – Nutley Lane	339
	4.57.2 Response to submission	339
4.58	58 – McAuley Muiris	339
	4.58.1 Submission – Baggot Street Upper	339
	4.58.2 Response to submission	339
4.59	59 – McDermott Brian	339
	4.59.1 Submission – Nutley Lane	339
	4.59.2 Response to submission	340
4.60	60 – McEvoy Jack and Freeda	340
	4.60.1 Submission – Nutley Lane	340
	4.60.2 Response to submission	340
4.61	61 – McGee Siobhan and Others	340
	4.61.1 Submission – Other	340
	4.61.2 Response to submission	341
4.62	62 – McGrath Damian	348
	4.62.1 Submission – Baggot Street Upper & Pembroke Road	348
	4.62.2 Response to submission	348
4.63	63 – McKillen Dr Mike	348
	4.63.1 Submission – Nutley Lane	348
	4.63.2 Response to submission	349
4.64	64 – Merrion Road Residents Association	349
	4.64.1 Submission – Merrion Road	349
	4.64.2 Response to submission	349
4.65	65 – Moore Maura and O’Reilly Joseph	353
	4.65.1 Submission – Pembroke Road	353
	4.65.2 Response to submission	353
4.66	66 – Moran Pádraig	353
	4.66.1 Submission – Whole Scheme	353
	4.66.2 Response to submission	353
4.67	67 – Morris Mary	355
	4.67.1 Submission - Baggot Street Upper	355
	4.67.2 Response to submission	355
4.68	68 – Morris Mary Ballyfermot	355
	4.68.1 Submission – Baggot Street Upper	355
	4.68.2 Response to submission	356
4.69	69 – Mulligan Paddy	356
	4.69.1 Submission – Baggot Street Upper	356
	4.69.2 Response to submission	356
4.70	70 – Mulligan Susan and Cyril	356

	4.70.1	Submission – Pembroke Road	356
	4.70.2	Response to submission	357
4.71		71 – Nolan Bill and Margaret	357
	4.71.1	Submission – Nutley Lane	357
	4.71.2	Response to submission	357
4.72		72 – Nutley’s Resident’s Association	357
	4.72.1	Submission – Nutley Lane	357
	4.72.2	Response to submission	358
4.73		73 – O’Byrne Mark	363
	4.73.1	Submission – Baggot Street Upper	363
	4.73.2	Response to submission	364
4.74		74 – O’Callaghan Elise	364
	4.74.1	Submission – Whole Scheme	364
	4.74.2	Response to submission	364
4.75		75 – O’Leary Pierce	368
	4.75.1	Submission – Baggot Street Upper	368
	4.75.2	Response to submission	368
4.76		76 – O’Malley John P.	368
	4.76.1	Submission – Nutley Lane	368
	4.76.2	Response to submission	368
4.77		77 – O’Neill Garrett	369
	4.77.1	Submission – Pembroke Road	369
	4.77.2	Response to submission	369
4.78		78 – O’Shea James	369
	4.78.1	Submission – Baggot Street Upper	369
	4.78.2	Response to submission	369
4.79		79 – O’Sullivan Cornelius and Mary	369
	4.79.1	Submission – Nutley Lane	369
	4.79.2	Response to submission	370
4.80		80 – Owens Dr Rozelle	374
	4.80.1	Submission – Baggot Street Upper	374
	4.80.2	Response to submission	374
4.81		81 – Pembroke Road Association	374
	4.81.1	Submission – Pembroke	374
	4.81.2	Response to submission	375
4.82		82 – Quinn James	375
	4.82.1	Submission – Baggot Street Upper & Pembroke Road	375
	4.82.2	Response to submission	375
4.83		83 – Quinn Michael J. & Helen Quinn	375
	4.83.1	Submission – Baggot Street Upper & Pembroke Road	375
	4.83.2	Response to submission	376
4.84		84 – Rathgar Residents Association	376
	4.84.1	Submission – Entire Scheme	376
	4.84.2	Response to submission	376
4.85		85 – Reidy Sarah	378
	4.85.1	Submission – Baggot Street Upper & Pembroke Road	378
	4.85.2	Response to submission	378
4.86		86 – Ross Gráinne	378
	4.86.1	Submission – Baggot Street Upper & Pembroke Road	378
	4.86.2	Response to submission	378
4.87		87 – Smyth Richie	379
	4.87.1	Submission – Entire Scheme	379

	4.87.2	Response to submission	379
4.88		88 – Starr Vivienne	379
	4.88.1	Submission – Baggot Street Upper & Pembroke Road	379
	4.88.2	Response to submission	379
4.89		89 – Staunton Sarah	380
	4.89.1	Submission – Whole Scheme	380
	4.89.2	Response to submission	380
4.90		90 – Tarmey Seamus	380
	4.90.1	Submission – Baggot Street Upper & Pembroke Road	380
	4.90.2	Response to submission	380
4.91		91 – Taylor Anne-Marie	380
	4.91.1	Submission – Pembroke	380
	4.91.2	Response to submission	381
4.92		92 – Tesco Ireland Limited	381
	4.92.1	Submission – Baggot Street Upper / Merrion Road	381
	4.92.2	Response to submission	381
4.93		93 – Tomaz Barbara	381
	4.93.1	Submission – Pembroke Road	381
	4.93.2	Response to submission	382
4.94		94 – Tyrell Hugh	382
	4.94.1	Submission – Nutley Lane	382
	4.94.2	Response to submission	382
4.95		95 – Upper Baggot Street Traders Association	382
	4.95.1	Submission – Baggot Street Upper	382
	4.95.2	Response to submission	382
4.96		96 - Eileen Vaughan	383
	4.96.1	Submission – Pembroke Road	383
	4.96.2	Response to submission	383
4.97		97 - Wappinger Food Corporation Limited	383
	4.97.1	Submission – Ballsbridge	383
	4.97.2	Response to submission	383

Tables

Table 1.1:	Summary of Submissions in Response to the Proposed Scheme	14
Table 1.2:	Location Referred to by each Objection to the CPO (by ABP Reference Number)	15
Table 1.3:	Location(s) Referred to by each Submission on the Proposed Scheme (by ABP Reference Number)	16
Table 2.1:	Submissions Made in Respect of Nutley Lane	19
Table 2.2:	Submissions Made in Respect of Baggot Street Upper	48
Table 2.3:	Submissions Made in Respect of Baggot Street Upper	72
Table 3.1:	ABP CPO numbering by geographic location	185

Figures

Figure 2.1:	Extract 1 from General Arrangement Drawing	18
Figure 2.2:	Extract 2 from General Arrangement Drawing	18
Figure 2.3:	2028 AM Peak Hour Passenger Volume Along Proposed Scheme (inbound direction)	21
Figure 2.4:	2043 AM Peak Hour Passenger Volume Along Proposed Scheme (Inbound direction)	21
Figure 2.5:	Extract from New Dublin Area Bus Network Map (NTA 2020)	22

Figure 2.6: Extract from Greater Dublin Area Cycle Network Plan (Proposed Scheme Highlighted in Yellow for Information)	23
Figure 2.7: Pay & Display Parking on Nutley Avenue (Image Source: Google)	29
Figure 2.8: General Traffic Flow Difference – AM Peak Hour	30
Figure 2.9: Typical Junction Layout from BusConnects Design Guidance Booklet	33
Figure 2.10: Extract of Map 11 of the draft PRO for the 3 rd Round of Public Consultation on Nutley Lane	36
Figure 2.11: Nutley Lane - Significance of Effects for Pedestrian Impact during Operational Phase	38
Figure 2.12: Do Something Photomontage of the proposed wall from the roadside on Nutley Lane	42
Figure 2.13: Extract from General Arrangement Drawing	44
Figure 2.14: Extract from Landscape General Arrangement Drawing	44
Figure 2.15: Extract from Landscape General Arrangement Drawings 1	45
Figure 2.16: Extract from Landscape General Arrangement Drawings 2	45
Figure 2.17: Pembroke Road - View 1, Existing Situation	46
Figure 2.18: Pembroke Road – View 1, Post-Implementation of the Proposed Scheme	46
Figure 2.19: Pembroke Road - View 2, Existing Situation	47
Figure 2.20: Pembroke Road - View 2, Post-Implementation of the Proposed Scheme	47
Figure 2.21: Combined Activity Density Map	50
Figure 2.22: Annotated Extract from Combined Activity Density map in the Baggot Street Upper Area	50
Figure 2.23: Stage 2 Route options sub-section division extracted from ‘Dún Laoghaire to City Centre Core Bus Corridor Options Study – Feasibility and Options Assessment’	51
Figure 2.24: Stage 2 Route options sub-section division extracted from ‘Dún Laoghaire to City Centre Core Bus Corridor Options Study – Feasibility and Options Assessment’	52
Figure 2.25: SAS 1 Route Options Assessment Summary (Main Criteria)	53
Figure 2.26: Extract from Chapter 6 of the EIAR outlining road links which experience traffic reduction during the 2028 AM Peak Hour	54
Figure 2.27: Pembroke Road - View 1, Existing Situation	59
Figure 2.28: Pembroke Road - View 1, Post-Implementation of the Proposed Scheme	59
Figure 2.29: Pembroke Road - View 2, Existing Situation	60
Figure 2.30: Pembroke Road - View 2, Post-Implementation of the Proposed Scheme	60
Figure 2.31: Extract from General Arrangement Drawing	69
Figure 2.32: Extract from Landscape General Arrangement Drawing	69
Figure 2.33: Baggot Street Upper - View 1, Existing Situation	70
Figure 2.34: Baggot Street Upper – View 1, Post-Implementation of the Proposed Scheme	70
Figure 2.35: Baggot Street Upper - View 2, Existing Situation	71
Figure 2.36: View 2, Post-Implementation of the Proposed Scheme	71
Figure 2.37: Combined Activity Density Map	74
Figure 2.38: Annotated Extract from Combined Activity Density map in the Baggot Street Upper Area	74
Figure 2.39: Stage 2 Route options sub-section division extracted from ‘Dún Laoghaire to City Centre Core Bus Corridor Options Study – Feasibility and Options Assessment’	75
Figure 2.40: Sub-section SAS1 Route Options extracted from ‘Dún Laoghaire to City Centre Core Bus Corridor Options Study – Feasibility and Options Assessment’	76
Figure 2.41: SAS 1 Route Options Assessment Summary (Main Criteria)	77
Figure 2.42: Extract from Chapter 6 of the EIAR outlining road links which experience traffic reduction during the 2028 AM Peak Hour	78
Figure 2.43: Baggot Street Upper - View 1, Existing Situation	87
Figure 2.44: Baggot Street Upper – View 1, Post-Implementation of the Proposed Scheme	87
Figure 2.45: Baggot Street Upper - View 2, Existing Situation	88

Figure 2.46: View 2, Post-Implementation of the Proposed Scheme	88
Figure 2.47: Typical Junction Layout from BusConnects Design Guidance Booklet	93
Figure 2.48: extract from Figure 30 of Appendix A4.1 (Preliminary Design Guidance Booklet)	96
Figure 2.49: extract from Figure 30 of Appendix A4.1 (Preliminary Design Guidance Booklet)	97
Figure 2.50: Facilities for Inbound Cyclists from Monkstown Road	98
Figure 2.51: New Soft Landscaping Areas at Sion Hill / Castledawson	100
Figure 2.52: Extract from Figure 12.6 showing location of Three-Cornered Garlic	109
Figure 2.53: Stage 2 Route options sub-section division extracted from 'Dún Laoghaire to City Centre Core Bus Corridor Options Study – Feasibility and Options Assessment'	121
Figure 2.54: Sub-section SAS1 Route Options extracted from 'Dún Laoghaire to City Centre Core Bus Corridor Options Study – Feasibility and Options Assessment'	122
Figure 2.55: Typical Junction Layout from BusConnects Design Guidance Booklet	128
Figure 2.56 Example from the Netherlands of traffic signals + give way signage controlling turning traffic and cyclists (Source: Dutch Design Guide Ontwerprijzer Fietsverkeer)	129
Figure 2.57: Extract from Dutch Design Guide Ontwerprijzer Fietsverkeer	130
Figure 2.58: Proposed Junction Layout as part of the Proposed Scheme	133
Figure 2.59: Proposed ultimate junction layout following implementation of the Proposed Scheme and the Bray to City Centre CBC Scheme	133
Figure 2.60 Typical Junction Layout from BusConnects Design Guidance Booklet	145
Figure 2.61 Example from the Netherlands of traffic signals + give way signage controlling turning traffic and cyclists (Source: Dutch Design Guide Ontwerprijzer Fietsverkeer)	146
Figure 2.62: Extract from Dutch Design Guide Ontwerprijzer Fietsverkeer	146
Figure 2.63: Extract from EIAR Chapter 13 detailing change in impermeable surface area and proposed SuDS features	166
Figure 3.1: Proposed new Layout at 133-145 Merrion Road	186
Figure 3.2: Existing aerial view of at 133-145 Merrion Road (Image Source: Google)	187
Figure 3.3: Existing Street View of 133-145 Merrion Road (Image Source: Google)	187
Figure 3.4: Proposed new Layout at Blackrock Clinic	190
Figure 3.5: Existing aerial view at Blackrock Clinic (Image Source: Google)	191
Figure 3.6: Existing Street View at Blackrock Clinic (Image Source: Google)	191
Figure 3.7: Constraints at Emmet Square (Image Source: Google)	194
Figure 3.8: Photomontage View 2 As Proposed View from Rock Road at Emmet Square	198
Figure 3.9: Proposed new Layout at Meta, Merrion Road	201
Figure 3.10: Existing aerial view of Meta, Merrion Road (Image Source: Google)	201
Figure 3.11: Existing Street View of Meta, Merrion Road (Image Source: Google)	202
Figure 3.12: Proposed new Layout at Blackrock College	203
Figure 3.13: Proposed new Layout at Blackrock College	204
Figure 3.14: Proposed new Layout at Blackrock College (Willow Park)	204
Figure 3.15: Existing aerial view at Blackrock College (Image Source: Google)	205
Figure 3.16: Existing aerial view at Blackrock College (Willow Park) - (Image Source: Google)	205
Figure 3.17: Existing Street View at Blackrock College (Image Source: Google)	205
Figure 3.18: Existing Street View at Blackrock College (Image Source: Google)	206
Figure 3.19: Existing Street View at Blackrock College (Willow Park) (Image Source: Google)	206
Figure 3.20: Proposed new Layout in vicinity of BreastCheck Merrion (SVUH)	209
Figure 3.21: Existing aerial view in vicinity of BreastCheck Merrion (SVUH) - (Image Source: Google)	210
Figure 3.22: Existing aerial view in vicinity of BreastCheck Merrion (SVUH) showing new Structure within SVUH - (Image Source: Google)	210

Figure 3.23: Existing Street View in vicinity of BreastCheck Merrion (SVUH) - (Image Source: Google)	211
Figure 3.24: Proposed new Layout at the Clayton Hotel Merrion Road	212
Figure 3.25: Existing aerial view at the Clayton Hotel Merrion Road (Image Source: Google)	213
Figure 3.26: Existing Street View at the Clayton Hotel Merrion Road (Image Source: Google)	213
Figure 3.27: Proposed new Layout at 118 Stillorgan Road	216
Figure 3.28: Existing aerial view at 118 Stillorgan Road (Image Source: Google)	216
Figure 3.29: Existing Street View at 118 Stillorgan Road – view from Stillorgan Road (Image Source: Google)	217
Figure 3.30: Existing Street View at 118 Stillorgan Road – view from Nutley Lane (Image Source: Google)	217
Figure 3.31: Existing Street View at 118 Stillorgan Road – view from Stillorgan Road (Image Source: Google)	219
Figure 3.32: Proposed new Layout at Elm Court Apartments	220
Figure 3.33: Existing aerial view at Elm Court Apartments (Image Source: Google)	220
Figure 3.34: Existing Street View at Elm Court Apartments (Image Source: Google)	221
Figure 3.35: Proposed new Layout at Elm Park Golf and Sports Club (South of Nutley Park)	226
Figure 3.36: Proposed new Layout at Elm Park Golf and Sports Club (North of St. Vincent’s Hospital)	226
Figure 3.37: Existing aerial view at Elm Park Golf and Sports Club (Image Source: Google)	226
Figure 3.38: Existing Street View at Elm Park Golf and Sports Club – looking north at vehicular entrance to property (Image Source: Google)	227
Figure 3.39: Existing Street View at Elm Park Golf and Sports Club – looking south at northern end of site (Image Source: Google)	227
Figure 3.40: 2028 AM Peak Hour Passenger Volume Along Proposed Scheme (inbound direction)	230
Figure 3.41: 2043 PM Peak Hour Passenger Volume Along Proposed Scheme (outbound direction)	231
Figure 3.42: Extract from New Dublin Area Bus Network Map (NTA 2020)	232
Figure 3.43: Extract from Greater Dublin Area Cycle Network Plan (Proposed Scheme Highlighted in Yellow for Information)	233
Figure 3.44: Proposed new Layout at Elmpark Green Merrion Road	237
Figure 3.45: Existing aerial view at Elmpark Green Merrion Road (Image Source: Google)	238
Figure 3.46: Existing Street View at Elmpark Green Merrion Road (Image Source: Google)	238
Figure 3.47: Proposed new Layout at 1-11 Pembroke Road	242
Figure 3.48: Existing aerial view at 1-11 Pembroke Road (Image Source: Google)	243
Figure 3.49: Existing Street View at 1-11 Pembroke Road (Image Source: Google)	243
Figure 3.50: Proposed new Layout at 153 Merrion Road	245
Figure 3.51: Existing aerial view at 153 Merrion Road (Image Source: Google)	246
Figure 3.52: Existing Street View at 153 Merrion Road (Image Source: Google)	246
Figure 3.53: Proposed new Layout at St. Vincent’s AGI	251
Figure 3.54: Existing aerial view at St. Vincent’s AGI (Image Source: Google)	252
Figure 3.55: Existing Street View at St. Vincent’s AGI (Image Source: Google)	253
Figure 3.56: Proposed new Layout at 1-11 Pembroke Road	256
Figure 3.57: Existing aerial view at 1-11 Pembroke Road (Image Source: Google)	256
Figure 3.58: Existing Street View at 1-11 Pembroke Road (Image Source: Google)	257
Figure 3.59: Proposed new Layout at Merrion House	260
Figure 3.60: Existing aerial view at Merrion House (Image Source: Google)	260
Figure 3.61: Existing Street View at Merrion House (Image Source: Google)	261
Figure 3.62: Extract from Fencing and Boundary Treatment Drawing	262

Figure 3.63: Proposed new Layout at Sion Hill Merrion Road	265
Figure 3.64: Existing aerial view at Sion Hill Merrion Road (Image Source: Google)	265
Figure 3.65: Existing Street View at Sion Hill Merrion Road (Image Source: Google)	266
Figure 3.67: Proposed new Layout at 31-33 Merrion Road	268
Figure 3.68: Existing aerial view at 31-33 Merrion Road (Image Source: Google)	269
Figure 3.69: Existing Street View at 31-33 Merrion Road (Image Source: Google)	269
Figure 3.70: Proposed new Layout at 155 Merrion Road	271
Figure 3.71: Existing aerial view at 155 Merrion Road (Image Source: Google)	271
Figure 3.72: Existing Street View at 155 Merrion Road (Image Source: Google)	272
Figure 3.73: Extract from GDA Cycle Network Plan (proposed scheme highlighted in yellow for information)	275
Figure 3.74: Proposed new Layout at 157 Merrion Road	276
Figure 3.75: Existing aerial view at 157 Merrion Road (Image Source: Google)	277
Figure 3.76: Existing Street View at (Image Source: Google)	277
Figure 3.77: Extract from GDA Cycle Network Plan (proposed scheme highlighted in yellow for information)	280
Figure 3.78: Proposed new Layout at Elmpark Green	282
Figure 3.79: Existing aerial view at Elmpark Green (Image Source: Google)	282
Figure 3.80: Existing Street View at Elmpark Green (Image Source: Google)	283
Figure 3.81: Proposed new Layout at Merrion Shopping Centre	284
Figure 3.82: Existing aerial view at Merrion Shopping Centre (Image Source: Google)	285
Figure 3.83: Existing Street View at Merrion Shopping Centre (Image Source: Google)	285
Figure 3.84: Proposed new Layout at Tesco Baggot Street Upper	287
Figure 3.85: Existing aerial view at Tesco Baggot Street Upper (Image Source: Google)	288
Figure 3.86: Existing Street View at Tesco Baggot Street Upper (Image Source: Google)	288
Figure 3.87: Proposed Loading Bay Cross Section with Chamfered Kerbs	290
Figure 3.88: Proposed new Layout at 1-11 Pembroke Road	291
Figure 3.89: Existing aerial view at 1-11 Pembroke Road (Image Source: Google)	292
Figure 3.90: Existing Street View at (Image Source: Google)	292
Figure 3.91: Extract from Chapter 6 of the EIAR outlining road links which experience traffic reduction during the 2028 AM Peak Hour	294
Figure 3.92: Combined Activity Density Map	295
Figure 3.93: Annotated Extract from Combined Activity Density map in the Baggot Street Upper Area	295
Figure 3.94: Stage 2 Route options sub-section division extracted from 'Dún Laoghaire to City Centre Core Bus Corridor Options Study – Feasibility and Options Assessment'	296
Figure 3.95: Sub-section SAS1 Route Options extracted from 'Dún Laoghaire to City Centre Core Bus Corridor Options Study – Feasibility and Options Assessment'	297
Figure 3.96: Proposed new Layout at Roly's Bistro Merrion Road	299
Figure 3.97: Existing aerial view at Roly's Bistro Merrion Road (Image Source: Google)	299
Figure 3.98: Existing Street View at Roly's Bistro Merrion Road (Image Source: Google)	300
Figure 4.1: Extent of land take at the corner of Phoenix Terrace / Blackrock Park (Image Source: Google)	328
Figure 4.2: Preliminary design of the Proposed Scheme tie-in with the Bray to City Centre Core Bus Corridor Scheme	362
Figure 4.3: 2028 AM Peak Hour Passenger Volume Along Proposed Scheme (inbound direction)	373
Figure 4.4: 2043 PM Peak Hour Passenger Volume Along Proposed Scheme (outbound direction)	374

Drawings

No table of figures entries found.

Pictures

No table of figures entries found.

Photographs

No table of figures entries found.

Attachments

No table of figures entries found.

Appendices

No table of contents entries found.

1. Introduction

1.1 Introduction

This report provides a response to the submissions and objections made to An Bord Pleanála (“the Board”) in response to the following:

- *the application under Section 51 of the Roads Act 1993, as amended, for approval of the Belfield / Blackrock to City Centre Core Bus Corridor Scheme (“the Proposed Scheme”); and*
- *the Belfield / Blackrock to City Centre Core Bus Corridor Scheme Compulsory Purchase Order 2022 (“the CPO”).*

An overview of the submissions and objections is provided in Section 1.2 below. The issues raised in the submissions on the Proposed Scheme, together with responses thereto are provided in Section 2. The issues raised in the objections to the CPO, together with the relevant responses, are provided in Section 3. It is noted that there is a degree of overlap between many of the issues raised in submissions on the Proposed Scheme.

Where the same issue is raised in a number of submissions and/or objections, this report identifies the individuals who raised those issues and provides a composite response to each issue raised.

1.2 Overview of Submissions and Objections Received

A total of 120 submissions and objections were received by the Board; 97 submissions in response to the Proposed Scheme and 23 objections to the associated CPO.

Each submission and each objection were individually numbered according to their alphabetical order and this numbering system has been retained for ease of reference in this report.

The 97 submissions in response to Proposed Scheme are broken down into groups either associated with a particular location along the Corridor or of a more general nature below. Of the 97 submissions, 87 related to single site-specific locations and 10 related generally to the whole scheme (submissions related to more than 1 location). Table 1.1 below sets out the locations referred to, the number of submissions on the Proposed Scheme referring to each location and the key issues raised by the submissions.

Table 1.1: Summary of Submissions in Response to the Proposed Scheme

	Location	No. of submissions on the Proposed Scheme referencing this Location	Key Issues Raised
1	Nutley Lane	25	Need for the Scheme (on Nutley Lane), extents of proposed cross section, cycle provision.
2	Merrion Road	2	Proposed Land take, Loss of trees
3	Pembroke Road	14	Amendments to access/egress, routing of services on Pembroke Road/Baggot Street.
4	Upper Baggot Street	28	Loading, Parking, routing of services on Pembroke Road/Baggot Street.
5	George’s Avenue / Blackrock	2	Proposed Traffic Management Measures, access to Blackrock Village Centre

	Location	No. of submissions on the Proposed Scheme referencing this Location	Key Issues Raised
6	Pembroke Road/Baggot St Upper	6	
6	Whole Scheme	10	Various
7	Individual properties	10	Land acquisition from property (6 identical Objections also made in relation to the CPO)

23 objections to the CPO related to the acquisition of land from an individual plot and 6 of these objections were the same as submissions made in response to the Proposed Scheme. The locations to which these objections related were throughout the scheme.

The location(s) referred to by each objection to the CPO and each submission in response to the Proposed Scheme shown in Table 1.2 and Table 1.3 below.

Table 1.2: Location Referred to by each Objection to the CPO (by ABP Reference Number)

No	Location	No	Location	No	Location	No	Location
1	Merrion Road	7	Stillorgan Road	13	Merrion Road (St. Vincent's AGI)	19	157 Merrion Road
2	Rock Road (Blackrock Clinic)	8	Merrion Road (Elm Court Apartments)	14	1-11 Pembroke Road	20	Merrion Road (Elm Park Green)
3	Merrion Road (Facebook / Meta)	9	Nutley Lane (Elm Park Golf and Sports Club)	15	Merrion Road (Merrion House)	21	Merrion Road (Merrion Shopping Centre)
4	Rock Road (Blackrock College)	10	Merrion Road (Elm Park Green)	16	Rock Road (Castledawson / Westfield)	22	1-11 Pembroke Road
5	Merrion Road (St Vincent's Hospital)	11	1-11 Pembroke Road	17	31 – 33 Merrion Road	23	Merrion Road (Roly's Bistro)
6	Merrion Road (Dalata-Clayton Hotel)	12	153 Merrion Road	18	155 Merrion Road		

Table 1.3: Location(s) Referred to by each Submission on the Proposed Scheme (by ABP Reference Number)

No	Location	No	Location	No	Location	No	Location
1	Other	26	Pembroke Road	51	Baggot Street Upper	76	Nutley Lane
2	Other	27	Pembroke Road	52	Baggot Street Upper	77	Pembroke Road
3	Pembroke Road	28	Entire Scheme	53	Nutley Lane	78	Baggot Street Upper
4	Other	29	Entire Scheme	54	Baggot Street Upper	79	Nutley Lane
5	Baggot St Upper	30	Entire Scheme	55	Nutley Lane	80	Baggot Street Upper
6	Baggot St Upper	31	Entire Scheme	56	Other	81	Pembroke Road
7	Nutley Lane	32	Baggot St Upper & Pembroke Road	57	Nutley Lane	82	Baggot Street Upper
8	Nutley Lane	33	Other	58	Baggot Street Upper	83	Baggot Street Upper & Pembroke Road
9	Nutley Lane	34	Nutley Lane	59	Nutley Lane	84	Entire Scheme
10	Nutley Lane	35	Baggot St Upper & Pembroke Road	60	Nutley Lane	85	Baggot Street Upper & Pembroke Road
11	Other	36	Nutley Lane	61	Other	86	Baggot Street Upper & Pembroke Road
12	Nutley Lane	37	Pembroke Road	62	Baggot Street Upper	87	Entire Scheme
13	Pembroke Road	38	Other	63	Nutley Lane	88	Baggot Street Upper & Pembroke Road
14	Nutley Lane	39	Nutley Lane	64	Merrion Road	89	Baggot Street Upper
15	Baggot St Upper	40	Baggot St Upper	65	Pembroke Road	90	Entire Scheme
16	Baggot St Upper	41	Baggot St Upper	66	Entire Scheme	91	Pembroke Road
17	Nutley Lane	42	Entire Scheme	67	Baggot Street Upper	92	Baggot Street Upper
18	George's Avenue	43	Baggot St Upper	68	Baggot Street Upper	93	Pembroke Road
19	Pembroke Road	44	Baggot St Upper	69	Baggot Street Upper	94	Nutley Lane

No	Location	No	Location	No	Location	No	Location
20	George's Avenue	45	Baggot Street Upper	70	Pembroke Road	95	Baggot Street Upper
21	Merrion Road	46	Nutley Lane	71	Nutley Lane	96	Pembroke Road
22	Baggot St Upper	47	Nutley Lane	72	Nutley Lane	97	Other
23	Nutley Lane	48	Pembroke Road	73	Baggot St Upper		
24	Other	49	Baggot St Upper	74	Entire Scheme		
25	Baggot St Upper	50	Nutley Lane	75	Baggot St Upper		

2. Response to Submissions on Proposed Scheme

2.1 Proposed Scheme on Nutley Lane

2.1.1 Description of Proposed Scheme at this Location

As set out in Section 4.5.5.1 of Chapter 4 of the EIAR, Proposed Scheme Description, this alignment of the Proposed Scheme ties in with the existing signalised junction of the R138 Stillorgan Road and Nutley Lane. Proposed works to this junction are confined to removing the existing left turn slip lane from Nutley Lane to the R138 Stillorgan Road, and providing a new two-way cycle crossing across the R138 Stillorgan Road on the eastern arm of the junction. It is noted that the Bray to City Centre Core Bus Corridor Scheme is routed along the R138 Stillorgan Road and proposes significant interventions at this junction. The design of the Proposed Scheme and the Bray to City Centre Scheme at this junction have been coordinated. Between the R138 Stillorgan Road and Nutley Road, a four lane cross-section is proposed, with a bus lane and a general traffic lane in each direction. It is proposed that a two-way cycle track will be provided on the eastern side of Nutley Lane, continuing north past the entrance to Elm Park Golf and Sports Club. This proposed cross-section includes the requirement for land acquisition from the properties currently occupied by RTÉ and Eir.

Between the entrance to Elm Park Golf and Sports Club and the entrance to SVUH, in order to achieve the objectives of the Proposed Scheme and facilitate the provision of bus lanes in each direction and a two-way cycle track while minimising land acquisition, no footpath is proposed on the Elm Park Golf and Sports Club side of road. A Toucan crossing will be provided just north of the access to Elm Park Golf and Sports Club. The proposed two-way, 3.0m wide, cycle track will continue on the Elm Park Golf and Sports Club side of Nutley Lane, as far as the SVUH access junction. The existing footpath and verge on the north-western (residential) side of this stretch of Nutley Lane, is proposed to be retained, which in turn allows the trees on this side of the road to also be retained. No land acquisition of any residential property (i.e., no boundary wall of residences will be affected) along this stretch of Nutley Lane will be required, however, to achieve the proposed cross section, land acquisition from the Elm Park Golf and Sports Club as well as SVUH will be required.

Toucan crossings are proposed at the SVUH access junction to connect the two-way cycle track to the single cycle tracks to the north.

At the access junction to SVUH, a right turn lane into the hospital is proposed which requires a curtailment of the receiving southbound bus lane in order to mitigate potential impact on the operation of internal roadways within the hospital. Southbound bus priority will be enabled through signal controlled priority provided on the northern arm.

From the access junction to SVUH to the junction of Nutley Lane with Merrion Road, the proposed cross-section comprises four lanes, including a bus lane and a general traffic lane in each direction with a single cycle track in each direction also. To achieve the proposed cross section along this stretch of Nutley Lane, land acquisition from the Merrion Shopping Centre as well as SVUH will be required.

Extracts from drawing set **2. General Arrangement**, which are provided as an appendix to Chapter 4 in Volume 3 of the EIAR, are included below in Figure 2.1 and Figure 2.2.

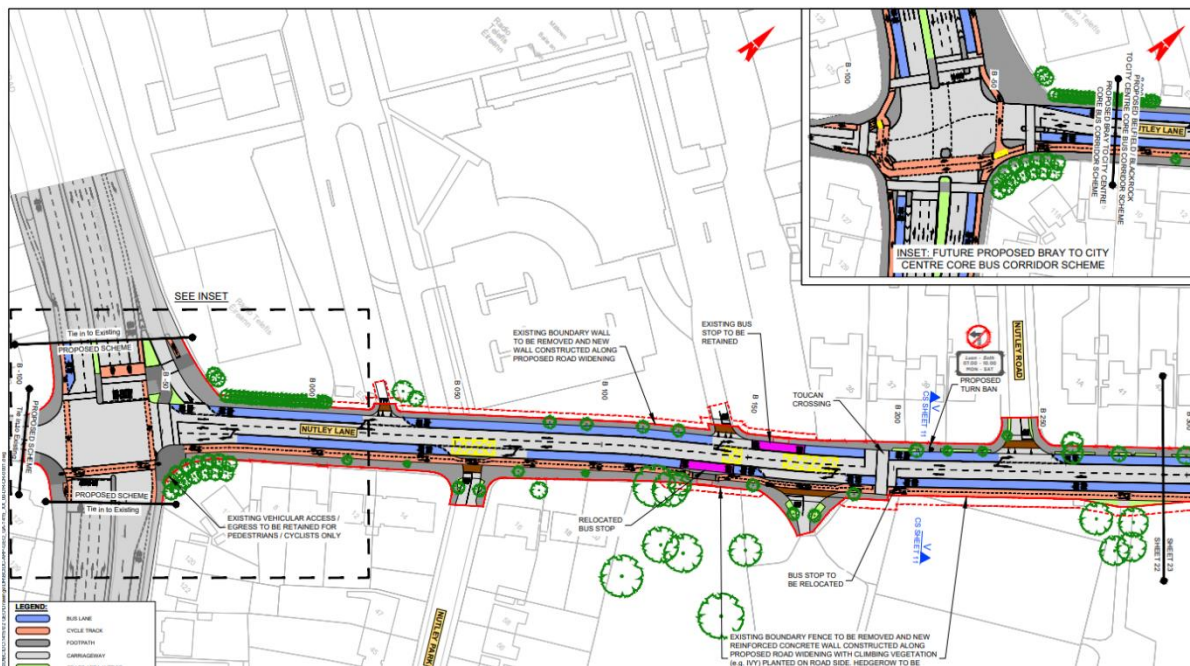


Figure 2.1: Extract 1 from General Arrangement Drawing

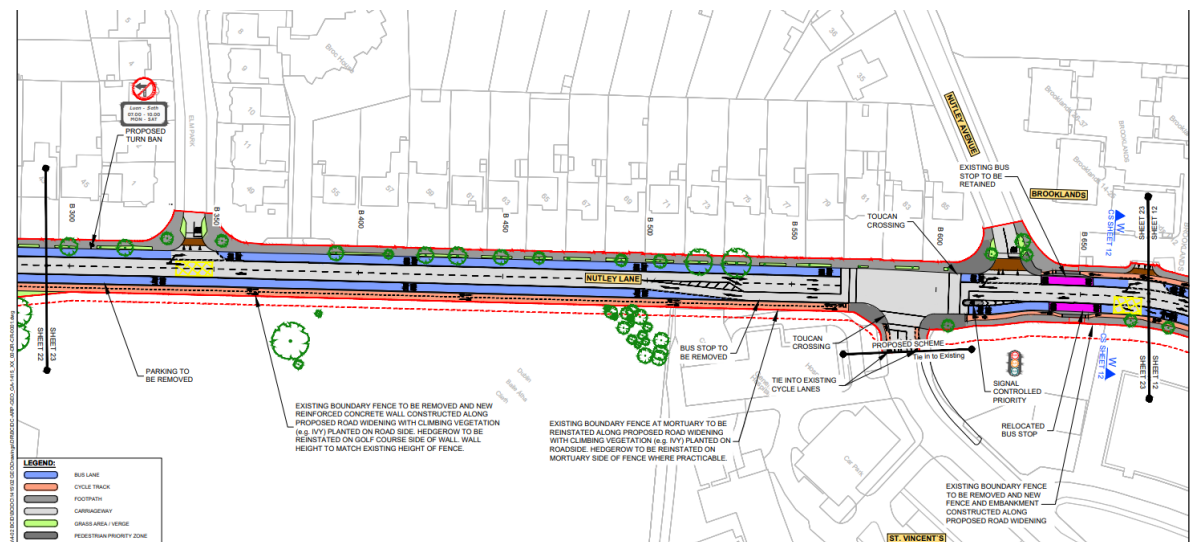


Figure 2.2: Extract 2 from General Arrangement Drawing

2.1.2 Overview of Submissions Received

Table 2.1 below lists the 25 individual submissions made in respect of the proposed scheme at Nutley Lane.

Table 2.1: Submissions Made in Respect of Nutley Lane

No	Name	No	Name	No	Name
7	David Bradley / Marie-Therese Cooney	36	David Frame / Geraldine Frame	60	Jack McEvoy / Freeda McEvoy
8	Hilda Bereton / Brian P Bereton	39	Patrick Halfpenny	63	Dr. Mike McKillen
9	David Brophy	46	Hilary Hough / Rosemary Hough	71	Bill Nolan / Margaret Nolan
10	Liam Byrne	47	Liam Kavanagh	72	Nutley Residents' Association
12	John Calvert / Emma Calvert	50	Margaret Kelly	76	John P. O'Malley
14	Breda Collins	53	Stephen Lillis / Sarah Lillis	79	Cornelius O'Sullivan / Mary O'Sullivan
17	Declan Corcoran	55	Mary Magrath	94	Hugh Tyrrell
23	Marion Dee	57	Clare Matthews		
34	Elm Park Golf and Sports Club	59	Brian McDermott		

2.1.3 Common Issues Raised

2.1.3.1 Need for the Proposed Scheme on Nutley Lane

Summary of Issue Raised

Many residents queried the need to provide a link between Merrion Road and Stillorgan Road stating that there are already well-established bus routes along Merrion Road and Stillorgan Road suggesting those routes should be utilised before creating a new connection through Nutley Lane. Submissions also stated that UCD is the starting and end point for buses using Nutley lane, expressing concern that the improvement of such a short link does not justify the adverse impacts, nor the associated cost and that the justification for the necessity of the link has not been demonstrated.

Response to issue raised

EIAR Volume 2 Chapter 2 Need for the Proposed Scheme outlines the policy context that underpins the Proposed Scheme as well as the regional and local transport need for the Proposed Scheme. Section 2.2.1.4 notes the following:

“To inform the preparation of the GDA Transport Strategy, the NTA prepared the Core Bus Network Report (NTA 2015) for the Dublin Metropolitan Area, which identified those routes on which there needed to be a focus on high capacity, high frequency and reliable bus services, and where investment in bus infrastructure should be prioritised and concentrated. The Core Bus Network is defined as a set of primary orbital and radial bus corridors which operate between the larger settlement centres in the Dublin Metropolitan Area.”

Section 2.2.1.6 outlines the need for the Nutley Lane link as part of the Core Bus Corridor Infrastructure Works. It notes that across the Core Bus Network, the corridors are generally proposed along established radial corridors into and out of the city. However, in developing the Core Bus Network a significant demand was identified for travel between UCD and Ballsbridge. It is for this reason that the Core Bus Network proposed a route connecting the radial corridors on which these destinations lie, namely the “Bray – UCD – Donnybrook” corridor and the “Dún Laoghaire to City

Centre” corridor. The Proposed Scheme connecting Belfield and Blackrock to the City Centre serves a significant public transport demand between these locations.

As noted in Section 2.2.2 of EIAR, there are a number of high frequency public bus services along the routes to be improved by the Proposed Scheme. Many of these services suffer from journey time unreliability, particularly in peak times, due to the lack of bus priority provision. The route from UCD via Nutley Lane and into the City Centre via Ballsbridge along the Merrion Road, already has a number of existing public bus services (including the 47 and 27x bus routes), as well as private services including shuttle buses connecting UCD with other transport services such as the DART at Sydney Parade. These services suffer from poor journey time reliability, again particularly at peak commuter times when demand is highest as there are currently no bus lanes on Nutley Lane. The UCD Belfield to DART shuttle bus operates from 8:00 to 10:10 and 16:00 to 18:10, while the 27x leaves the UCD terminus at 7:35 and 17:05. In addition to the level of service improvements the Proposed Scheme will facilitate for existing bus services, the ongoing Dublin Area Bus Network Redesign will see continued investment in bus services into the future, which will also be afforded similar journey-time reliability and therefore improve their attractiveness as an alternative to private car usage.

As part of the BusConnects revised bus network proposals, the Proposed Scheme will serve the B-Spine bus services. Image 2.7 in Chapter 2 of the EIAR which is reproduced below, is an extract from New Dublin Area Bus Network Map (NTA 2020) and shows the B-Spine interface with the Proposed Scheme between Monkstown Road and Nutley Lane (B3 and B4), along Nutley Lane (B1 and B2), and from Nutley Lane to the City Centre (B1, B2, B3 and B4). It is noted that both the B1 and B2 routes along Nutley Lane are proposed to operate with 15 minute intervals between buses, and the L13 route is proposed to operate with 60 minute intervals. This equates to 18 buses per hour on Nutley Lane in both directions.

It is further noted that the benefits of the scheme in terms of bus passenger volumes is clearly demonstrated in Chapter 6 of the EIAR. Diagram 6.11 in Section 6.4.6.2.3.1 of the EIAR (reproduced in Figure 2.3 below) presents the passenger loading profile the AM Peak Hour in the inbound direction in 2028.

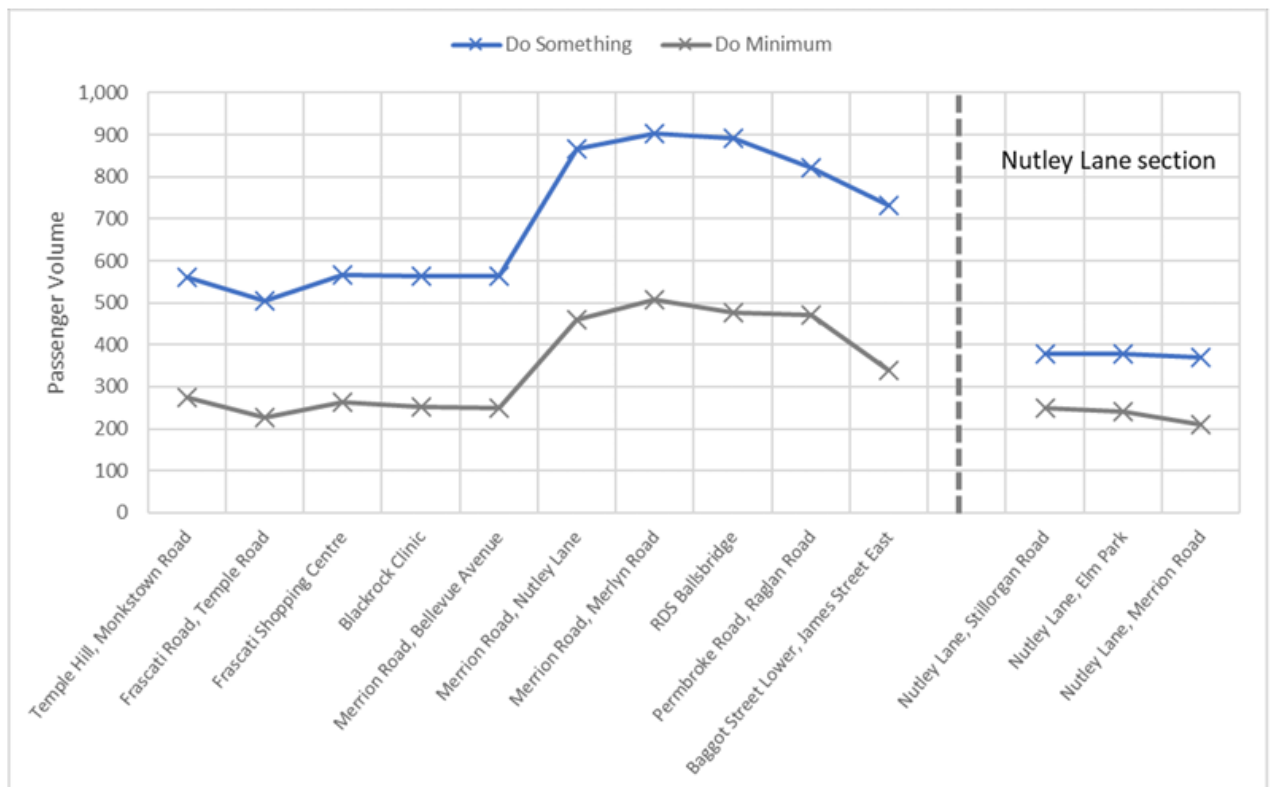


Figure 2.3: 2028 AM Peak Hour Passenger Volume Along Proposed Scheme (inbound direction)

As can be seen in Figure 2.3, a higher level of bus passenger loading can be seen along the Proposed Scheme with c.150-200 additional passengers being carried along Nutley Lane in the AM Peak hour in 2028. This increases to c. 300-350 additional passengers in the AM Peak hour in 2043 as shown in Diagram 6.12 in the EIAR (reproduced in Figure 2.4 below). The substantial increase in passengers using the corridor at this location as a result of the Proposed Scheme further highlights the need for the scheme along Nutley Lane. It is noted that as outlined in Section 6.3.1 of Chapter 6 of the EIAR, the Do Minimum scenario includes all other elements of the BusConnects Programme of projects (apart from the CBC Infrastructure Works elements), including the Dublin Area Bus Network Redesign. As such, the benefits outlined below are solely due to the infrastructure improvements proposed under the Proposed Scheme.

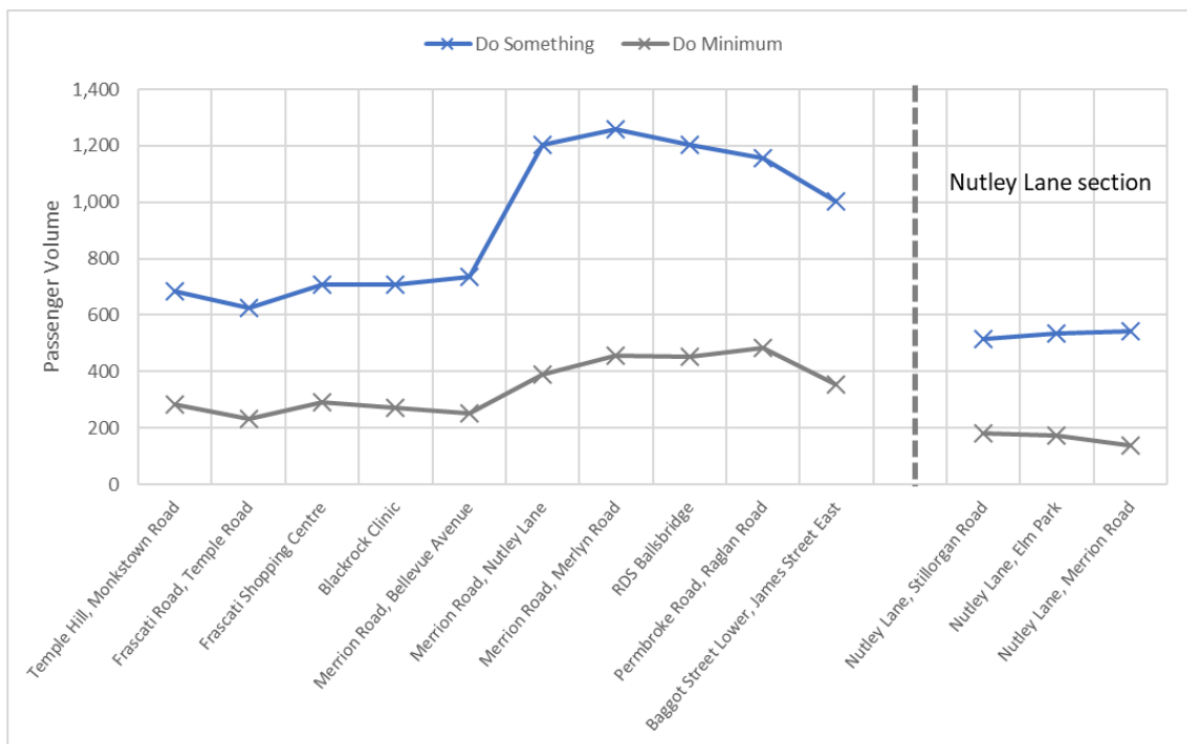


Figure 2.4: 2043 AM Peak Hour Passenger Volume Along Proposed Scheme (Inbound direction)

Demand for travel by bus is anticipated to continue to grow in this corridor into the future, in line with population growth. The bus priority measures forming part of the Proposed Scheme are required to accommodate this growth in travel demand and to facilitate the revised bus network (B-Spine) by providing journey time savings and reliability for passengers. This will ensure that the projected growth in passenger demand is facilitated and protected from increasing congestion, providing resilience which can in the future cater for additional bus service provision.

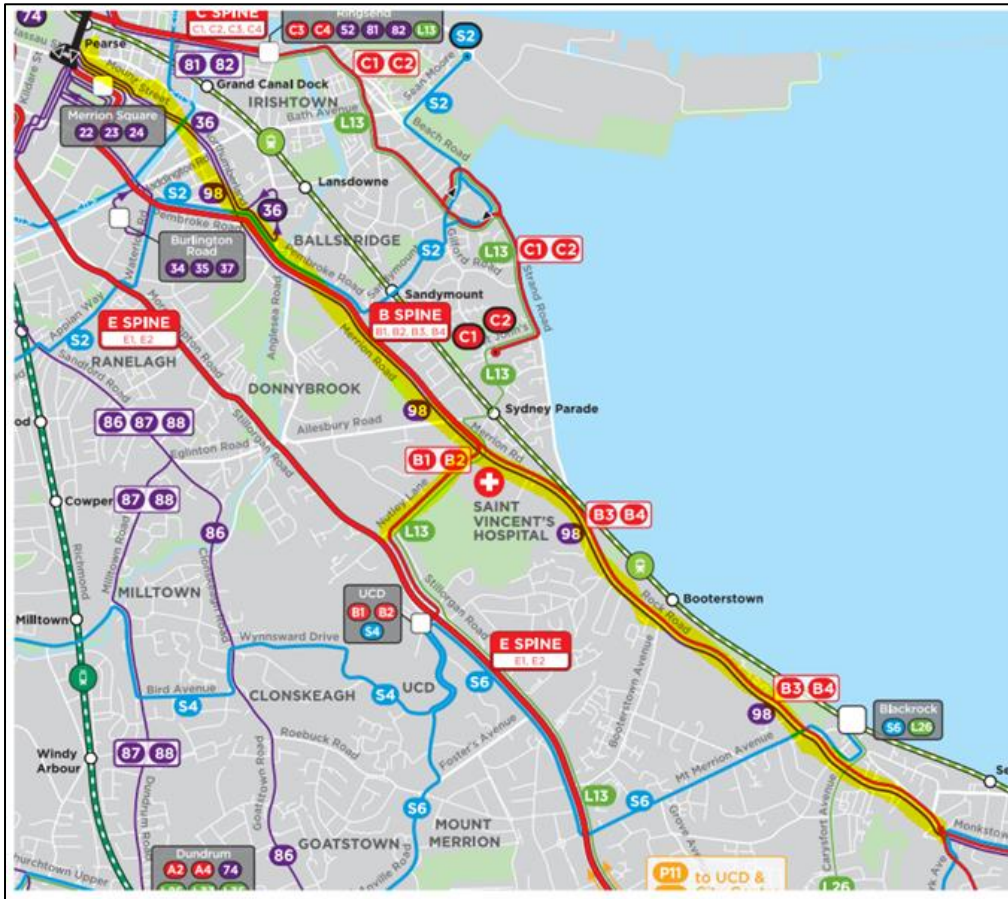


Figure 2.5: Extract from New Dublin Area Bus Network Map (NTA 2020)

In terms of cycling, EIAR Volume 2 Chapter 2 Section 2.2.1.3 outlines the need for the Nutley Lane link as part of the cycle network. This section notes that the Greater Dublin Area (GDA) Cycle Network Plan was adopted by the NTA in early 2014, following a period of consultation with the public and various stakeholders. This plan forms the strategy for the implementation of a high quality, integrated cycle network as set out in the GDA Transport Strategy. An extract from the GDACNP is shown in Figure 2.6, which highlights the Proposed Scheme in the context of the planned cycle network. There are two primary cycle routes (Cycle Route 13 and Cycle Route 13A) identified running along the majority of the Proposed Scheme, as well as Secondary Cycle Routes on Nutley Lane (S04) and Fitzwilliam Street (C7).



Figure 2.6: Extract from Greater Dublin Area Cycle Network Plan (Proposed Scheme Highlighted in Yellow for Information)

The GDA Cycle Network Plans also aims to provide high quality links to DART stations from the surrounding areas in order to increase the catchment area of these stations, assuming high quality cycle parking is available at all stations. One such example is the route from UCD to Sydney Parade, which was identified within the GDA Cycle Network Plan as requiring further development – noting that Nutley Lane (which is a key link in this route) currently has no cycle facilities. Cycle facilities in the Proposed Scheme will increase to 100% in both directions, all of which being segregated with the exception of localised tie-ins to the existing of environment. Given its status as a Secondary Cycle Route and its proximity to large catchments such as RTE, St. Vincent’s University Hospital, and UCD, and its function as a key connection to the DART, a high-quality cycle facility is required along Nutley Lane.

In summary, the need for high quality bus and cycle facilities along Nutley Lane has been demonstrated in Chapter 2 of EIAR which identifies the need to serve both existing and future planned bus services along the route, as well as providing a high-quality cycle facility that realises the ambition set out in the GDACNP.

2.1.3.2 Increase in air and noise pollution

Summary of Issue

Many of the submissions felt that the Proposed Scheme will give rise to an increase in noise pollution and a reduction in air quality, arising from increase in bus traffic. Concerns were expressed about the adverse consequences to human health and enjoyment of their area,

Response to issue

Air quality

The impacts of the Proposed Scheme on air quality have been assessed and are reported in Chapter 7 Air Quality of Volume 2 of the EIAR, as set out below.

In the vicinity of Nutley Lane, the key air quality sensitive receptors are St. Vincent's University Hospital and residential properties within 20m to 100m from the road. In terms of construction, Section 7.6.1 of Chapter 7 of the EIAR states that overall, it is considered that the residual effects as a result of the Proposed Scheme's construction are neutral and short-term. No significant residual impacts have been identified during the Construction Phase of the Proposed Scheme, whilst meeting the scheme objectives set out in Chapter 1.

In terms of operational impacts, Section 7.4.3.3 of Chapter 7 Air Quality of Volume 2 of the EIAR provides the operational phases predicted change in and impact on pollutant concentrations in 2028 as a result of the Proposed Scheme. The significance of the changes in the concentration of each of the ambient receptors has been determined in the context of the TII significance criteria (TII 2011) and are summarised as follows:

- the majority of modelled receptors are estimated to experience a negligible impact due to the Proposed Scheme in terms of the annual mean NO₂ concentration;
- the Proposed Scheme will be overall neutral in terms of annual mean PM₁₀ concentrations, with all receptors experiencing a negligible impact;
- the Proposed Scheme will be overall neutral in terms of the annual mean PM_{2.5} concentration with all receptors experiencing a negligible impact; and
- In accordance with the EPA Guidelines (EPA 2017) the impacts associated with the Operational Phase traffic emissions pre-mitigation are overall neutral and long-term

Noise and vibration

The impacts of the Proposed Scheme on noise and vibration have been assessed and are reported in Chapter 9 Noise and Vibration of Volume 2 of the EIAR. The traffic noise impacts associated with the Proposed Scheme have fully considered any physical changes along the proposed scheme with potential to alter traffic noise levels.

The study area for potential noise and vibration impacts during both Construction and Operational Phases relate to areas of potentially impacted noise sensitive locations (NSLs), which include areas where people spend significant periods of time and where concentration, sleep and amenity are important considerations. The key noise and vibration sensitive receptors in the vicinity of Nutley Lane include St. Vincent's University Hospital and residential properties within 20m to 100m from the road.

In terms of construction, Section 9.6.1 of the EIAR states that once the various mitigation measures are put in place, noise impacts associated with the Construction Phase will be negative, not significant to slight, temporary impact during all key construction phases, with the exception of road widening and utility works which are negative, slight to moderate and temporary within 15m distance to the works during daytime periods.

During evening periods, noise impacts associated with the Construction Phase will be of negative, not significant to slight, temporary impact during general road works, urban realm, boundary treatment, retaining wall works and additional works identified at distances greater than 15m from the works. During this period, noise impacts associated with road widening and utility diversion works will be of negative, moderate to significant, temporary impact at distances between 15m to 20m from the works. At distances within 10m of road widening / utility diversion and retaining wall works, the noise impact is negative, significant to very significant and temporary. As per DMRB Noise and Vibration (UKHA 2020), in cases of moderate to major magnitude of impacts, the duration of works determines the overall significance rating. As part of the mitigation measures, the durations advised in the DMRB

Noise and Vibration (UKHA 2020) will be followed, where practicable, to reduce overall significance effects (i.e. scheduling works to occur for periods of less than ten days/nights over 15 consecutive day/night periods and less than 40 days over six consecutive months where significant effects are identified). Once the CNL (Construction Noise Levels) and duration of works is considered in line with the DMRB Noise and Vibration (UKHA 2020) all key Construction Phase residual noise levels are not significant, whilst meeting the scheme objectives set out in Chapter 1 (Introduction).

In terms of operational impact, Section 9.6.2 of Chapter 9 of the EIAR states that once operational, there will be a positive to neutral direct impact along the Proposed Scheme due to a reduction in traffic volumes during both the year of opening and the design year.

There are no significant residual Operational Phase noise or vibration impacts associated with the Proposed Scheme, whilst meeting the scheme objectives set out in Chapter 01 of the EIAR.

Mitigation and Monitoring Measures

The appointed contractor will be required to take specific noise abatement measures to the extent required and comply with the recommendations of BS 5228–1 (BSI 2014a) and European Communities Noise Emissions by Equipment for Use Outdoors (Amendment) Regulations 2006 (S.I. No 241/2006). On review of the likely vibration levels associated with construction activities, it is considered that the construction of the Proposed Scheme is not expected to give rise to vibration that is either significantly intrusive or capable of giving rise to structural or cosmetic damage to buildings.

The impact assessment has determined that traffic noise impacts during the operational phase across the study area for the Proposed Scheme results in a positive to neutral imperceptible short and long-term direct impacts along the Proposed Scheme and negative imperceptible to moderate short- and long-term indirect impacts along the surrounding road network. The range of noise level changes and overall noise levels calculated do not require any specific noise mitigation measures to be incorporated into the Proposed Scheme.

2.1.3.3 Consideration of Alternatives Summary of Issue

A number of submissions raised concerns which related to the consideration of alternative scheme design options along this section of the Proposed Scheme. Within these submissions, key themes that are referenced include:

- a) **The removal of trees and foliage** - Many of the submissions objected to the removal of mature trees and foliage along Nutley Lane that would result from road widening, stating that the proposals will have a detrimental impact on the local environment. The trees and hedgerows along the boundary of the Elm Park Golf Club are of particular concern.
- b) **The removal of parking** - Many submissions raised concerns over the proposed removal of on-street parking along Nutley Lane as part of the Proposed Scheme and the proposals to redistribute parking into side roads off Nutley Lane, stating that St. Vincent's University Hospital experiences parking capacity issues and that the on-street parking is often used by visitors of the hospital. This problem will be exacerbated by the proposals to build the new maternity hospital on the ground of St. Vincent's University Hospital.
- c) **The consideration of a three lane option** - A number of submissions refer to the potential for a three lane option on Nutley Lane to mitigate against the removal of trees and parking, i.e. either a one-way general traffic regime, or partial bus lanes in each direction (i.e. splitting the provision so that a bus lane over half the length of the link is provided in each direction within the same cross-section) with signal controlled priority.

Response to issue

Chapter 3 of the EIAR (Consideration of Reasonable Alternatives) outlines the extensive options assessment exercise which has been undertaken to determine the Preferred Route Option for each section of the Proposed Scheme, including Nutley Lane. In line with the scheme objectives to deliver improved pedestrian, cycling and bus priority infrastructure on this key corridor, the EPR Option on

Nutley Lane consisted of two general traffic lanes, two bus lanes, two cycle tracks and two footpaths, from the R138 Stillorgan Road junction to the R118 Merrion Road junction. In order to achieve this cross-section, the EPR Option indicated a loss of existing trees and parking along the length of Nutley Lane, as well as potential land take on both sides of the road (including a number of front gardens on the north-west side immediately adjacent to Nutley Avenue).

From a review of submissions received as part of the first round of non-statutory public consultation for this route, as well as a review of the topographical survey carried out subsequent to the route's publication, a number of issues were identified with this proposal. The proposed removal of on-street trees and those in front gardens was a significant cause for concern amongst residents.

These issues primarily relate to the section of Nutley Lane between the St. Vincent's University Hospital entrance / Nutley Avenue and the Elm Park Golf and Sports Club entrance due to the number of residential properties fronting onto the north-western side of the road, including a number which were proposed to be subject to land acquisition, and the number of on-street trees.

Following this, an extensive options assessment was carried out along Nutley Lane to identify if there were any alternative options available which would reduce impacts while still achieving the scheme objectives. As set out in section 3.4.1.1.4 of the EIAR, an initial options appraisal of the cycle facilities in isolation was undertaken. Three options were assessed, as follows:

- **Option CF1 (EPR Option)** – Two single cycle tracks along the length of Nutley Lane;
- **Option CF2** – Providing a two-way cycle facility connecting from the R138 on the eastern side of Nutley Lane as far as the St. Vincent's University Hospital entrance, then reverting to the EPR Option of two single cycle tracks on both sides to Merrion Road; and
- **Option CF3** - Parallel cycle route via Woodbine Road and Trimleston Avenue to connect UCD to Merrion Road.

The preferred option for the Draft Preferred Route Option was Option CF2 – the provision of a two-way cycle facility from the junction with the R138 Stillorgan Road on the Elm Park Golf and Sports Club side, continuing as far as the St. Vincent's University Hospital entrance, then reverting to two single cycle tracks to Merrion Road. Compared to the other two options, this was considered to be the preferred option for cyclists, as it offered improved safety, comfort, and directness, and it reduced the potential impacts on properties and trees and was also the most cost-effective. In terms of the sub-criteria under the Environment criterion, the preferred option performed the best under this criterion as it had the lowest impact on trees, properties, boundaries, and parking.

As set out in Section 3.4.1.1.5 of the EIAR, following the cycle route appraisal, the principal route options along Nutley Lane were assessed. Seven options were considered.

- **Option NL1:** EPR Option of a single traffic lane, bus lane and cycle lane in each direction along the entire section, and some general design refinements identified upon review of the topographical survey;
- **Option NL2:** This route option reflects the EPR Option in terms of traffic and bus lane arrangements, however, includes the two-way cycle track as identified during the initial assessment of alternative cycle route options for the route selection process. This option also removes the footpath between Elm Park Golf and Sports Club and St. Vincent's University Hospital entrances on the south-east side of the road;
- **Option NL3:** As per NL2 from the R138 Stillorgan Road to Nutley Road and from St. Vincent's University Hospital entrance to the R118 Merrion Road, however, reduced to only two general traffic lanes between Nutley Road and St. Vincent's University Hospital entrance. This arrangement would be facilitated through the introduction of a Bus Gate on the northern side the Nutley Road junction;
- **Option NL4:** As per NL2 from the R138 Stillorgan Road to Elm Park Golf and Sports Club entrance and from St. Vincent's University Hospital entrance to the R118 Merrion Road,

however, reduced to a single one-way northbound general traffic lane between Nutley Road and St. Vincent's University Hospital entrance – with potential for offline traffic management measures. A continuous bus lane is proposed in either direction;

- **Option NL5:** As per NL2 from the R138 Stillorgan Road to Nutley Road and from St. Vincent's University Hospital entrance to the R118 Merrion Road, however, reduced to a three-lane cross-section of two general traffic lanes and back-to-back bus lanes in between with the introduction of signal-controlled bus priority at the junctions of Nutley Road and St. Vincent's University Hospital;
- **Option NL6:** As per NL2 from the R138 Stillorgan Road to Nutley Road and from St. Vincent's University Hospital entrance to the R118 Merrion Road, however, reduced to only two general traffic lanes (to be shared with buses) between Nutley Road and St. Vincent's University Hospital entrance. This arrangement would be facilitated through the introduction of a bus priority signal at both the Nutley Road junction and the St. Vincent's University Hospital entrance. Queue relocation would be utilised to provide virtual bus priority through the two-lane shared section;
- **Option NL7:** As per NL2 from the R138 Stillorgan Road to Nutley Road and from St. Vincent's University Hospital entrance to the R118 Merrion Road, however, reduced to only a northbound bus lane along with two general traffic lanes (southbound to be shared with buses) between St. Vincent's University Hospital entrance and Nutley Road. This arrangement would be facilitated through the introduction of a bus priority signal at the St. Vincent's University Hospital entrance. Queue relocation would be utilised to provide virtual bus priority through the southbound shared section.

The draft Preferred Route Option was identified as Option NL2, comprising two bus lanes and two traffic lanes along the majority of this section and the two-way cycle track described above. While other options did perform well under many criteria, the expected impacts in relation to Transport Quality & Reliability and Traffic Network Integration were considerably more significant than in the Preferred Route Option. In particular is the likely associated reduction of bus journey time reliability and potential impacts on surrounding residential streets due to local and through traffic detouring onto other streets such as Ailesbury Road and Nutley Road, and beyond, in the options assessed which did not provide full physical bus priority. This option was considered the preferred option as it will provide continuous bus priority and cycle facilities, while also minimising the required tree removal when compared to the EPR Option, and significantly reducing the land acquisition when compared to the EPR Option, and maintaining local access.

As outlined above, a number of the options developed consisted of a three-lane cross section between Nutley Road and St. Vincent's University Hospital, namely options NL4, NL5 and NL7. Each of these options had specific reasons as to why they were not preferred. All three of these options performed poorly under traffic network integration compared to Option NL2 due to detours required for through traffic as a result of the one-way system in option NL4 and the potential queuing and delays as a result of the signal-controlled priority measures in options NL5 and NL7. Each of the three-lane options also performed worse than Option NL2 in terms of Road Safety due to additional interactions required between buses and general traffic. Options NL5 and NL7 performed worse than option NL2 in terms of transport quality and reliability due to a lack of physical bus priority and sharing road space with general traffic.

The proposed road alignment was revised to retain the existing kerb line on the north-western (residential) side, and as such, retaining the existing on-street trees along this footpath, and removing the requirement for land acquisition and tree removal in private residential properties on that side of Nutley Lane.

It is noted that the scheme in this area has been specifically designed to reduce the impact on trees and land. As noted in table 4.29 of Chapter 4 of the EIAR, approximately 610m of narrowed two-way cycle track is provided on the south-eastern side of Nutley Lane. Providing a standard width would result in the loss of a further number of trees and would require additional land acquisition to adjacent

private properties with more significant impacts. This narrowed width enables the retention of the existing kerb line on the north-western side of the road and as such provides more opportunities for the retention of existing trees at the footway edge.

Impacted trees have been presented on the Volume 3 – Figures, Chapter 4 Proposed Scheme Description, 5. Landscaping General Arrangement drawings and further described in Volume 4 Appendices Part 2 of 2, Appendix A17.1 Arboricultural Impact Assessment (AIA). As summarised in Table 4 of the AIA, a total of 329 trees will be removed to facilitate the scheme. However as stated in section 17.4.4.2.9 of Chapter 17 there will be substantial replanting of trees as part of the proposed scheme. As stated in section 12.5.1.2.1 of Chapter 5, a total of 349 street trees will be planted throughout the scheme resulting in a net increase of 20 trees.

Where existing trees, hedges, and/or plantings are removed from temporary acquisition areas, new planting replacements will be provided as appropriate. Where practicable, new plants will be the same species to those removed. Replacement plant sizes will be those that are readily available and therefore, will be unlikely to match the maturity of plants removed (especially in the case of larger trees). However, where practicable, semi-mature trees will be used in the replanting works throughout the scheme. Where the same or similar species are provided, maturity like that of the existing can be achieved in time.

Chapter 17, Landscape (Townscape) & Visual of the EIAR has considered the potential landscape and visual impacts associated with the Construction and Operational Phases of the Proposed Scheme. Table 17.7 classifies the significance and quality of Townscape /Streetscape /Visual Effects / Effects of the proposed changes to the Townscape and Streetscape Character of Nutley Lane to be Negative, Significant / Very Significant and Temporary / Short-Term. As noted in Table 17.10, this reduces to Negative, Moderate and Short-Term at 1-year post construction and Negative, Slight/Moderate, Long-term at 15 years post construction.

Section 6.4.6.1.6.4 of Chapter 6 of the EIAR, Traffic and Transport, sets out the impact on parking and loading within this section of the Proposed Scheme. The following is noted in this regard:

“Removal of 39 residential pay & display and permit parking spaces along the eastern side of Nutley, Lane between Nutley Road and Nutley Avenue, to gain road space to provide a bus lane and general traffic lane travelling in each direction, where there is currently only one lane in each direction and no bus priority measures. All of the residential properties along this stretch have off-street parking and the on-street spaces are underutilised. There are approximately 60 equivalent parking spaces with ample availability along adjacent streets of Elm Park, Nutley Park, Nutley Road and Nutley Avenue where any displaced parking can be accommodated. As a result, the impact of this loss of parking is considered to have a Negative, Slight and long-term effect.”

And

“Removal of four disabled bays, one commercial pay & display, and two loading bays along the western side of Nutley Lane outside of Merrion Shopping Centre. This change is to gain road space to provide a cycle lane, bus lane and general traffic lane travelling in each direction. Merrion Shopping Centre provides free parking for customers in an off-street car park, including disabled parking. Furthermore, the shopping centre has a designated service yard for loading and servicing activities, therefore, the impact of the loss of the parking and loading bays at this location is considered to have a Negative, Slight and long-term effect.”

The assessment outlined in this section of the EIAR has identified approx. 105 on-street pay & display parking of equivalent types available within 200m of these locations on adjacent residential streets and within Merrion Shopping Centre. The EIAR determined that there are sufficient number of adjacent parking spaces to compensate for the loss of parking along Nutley Lane.

It is worth noting that the large trip attractors on Nutley Lane such as St Vincent's University Hospital, RTÉ Studios, Elm Park Golf and Sports Club, St. Michael's College and the Merrion Shopping Centre all currently have off-street parking on each of their sites. Overall, it is anticipated that more efficient use of off-street parking supply and some continued use of on-street parking on local side roads will

provide a robust and adequate parking provision for this area into the future. As part of the new permitted National Maternity Hospital, an extension to the existing multi-storey car park is under construction.

The NTA notes the concerns raised in relation to additional congestion and blocking of residential access on side roads off Nutley Lane. As outlined in the Section 7.1.3 of the Parking Survey Report contained in Appendix G of the Preliminary Design Report, approximately 105 alternative parking spaces are available within 200m of the Proposed Scheme in this location on Nutley Park, Nutley Road, Elm Park and Nutley Avenue. The proposed alternatives are formal Pay & Display parking with clear road markings identifying space allocated for parking. Enforcement of road traffic laws, including compliance with parking regulations, is a matter for An Garda Síochána.



Figure 2.7: Pay & Display Parking on Nutley Avenue (Image Source: Google)

2.1.3.4 *Traffic and Access Issues*

Summary of Issue

Many submissions expressed their concern that the Proposed Scheme will have result in congestion along Nutley Lane, that will arise from the increase in bus traffic. Concerns were raised about the adverse increase in air and noise pollution and, the deterioration of the community in Nutley Lane and residential enjoyment of the area. Stating that the proposals will divide the community into two. Some submissions also queried the design proposals at major junctions along Nutley Lane, namely junctions with Stillorgan Road, Merrion Road and St. Vincent's University Hospital. Many submissions state the proposals do nothing to relieve existing congestion at these junctions and that congestion will be exacerbated by the proposals, impact to ambulance access to St. Vincent's is of particular concern.

Residents of Nutley Lane also expressed their concern that the proposed four-lane cross-section and increase in bus frequencies will diminish accessibility to their properties. The alignment of the two-way cycle track between Nutley Park and R138 Stillorgan Road was another concern raised in the many submissions. Residents state that the decision to change the two-way cycle track from the northern side of Nutley Lane outside RTE, as noted during the non-statutory public consultation process, to the southern side was not consulted with residents of Nutley Lane prior to the ABP planning applications. Some submissions identified that the new alignment of the two-way cycle track will create property

access issues at eight residential homes on the southern side of Nutley Lane. And, that the previous alignment outside RTE was a better alternative as it created no conflicts with residential homes.

Several submissions also questioned why a Traffic Management Plan, assessing the cumulative impact of the Proposed Scheme was not developed for Nutley Lane.

Response to issue

Traffic Congestion

There are no increases in general traffic flows along the direct study area in the AM peak hour, as indicated in Chapter 6 of the EIAR, Traffic and Transport, which sets out the assessment of the impact on traffic and transport associated with the Construction and Operational Phases of the Proposed Scheme. This assessment has been carried out in line with the Environmental Protection Agency's (EPA) guidance on the information to be contained in EIARs and other best practice guidance. The Proposed Scheme aims to provide an attractive alternative to the private car and promote a modal shift to public transport, walking and cycling on this key access corridor in the Dublin region. Chapter 6 concludes that the Proposed Scheme will have a Positive, Moderate and Long-Term impact on areas along the Proposed Scheme, due to reductions in general traffic flows.

Table 6.65 in Section 6.4.6.2.8.3 General Traffic Flow Difference – AM Peak Hour, outlines that there will be a reduction of 220 Passenger Car Units (PCUs) on Nutley Lane during the AM peak hour. See Figure 2.8 below which presents an extract of Table 6.65 of Chapter 6 of the EIAR:

Table 6.65: Road Links that Experience a Reduction of ≥ 100 Combined Flows during 2028 AM Peak Hour (Direct Study Area)

Location	Map I.D.	Road Name	Do Minimum Flows (PCUs)	Do Something Flows (PCUs)	Flow Difference (PCUs)
Section 5 – R138 Stillorgan Road to R118 Merrion Road – Nutley Lane	S.5	Nutley Lane	1,112	892	-220

Figure 2.8: General Traffic Flow Difference – AM Peak Hour

This reduction in traffic flows is attributed to the Proposed Scheme and the associated modal shift as a result of its implementation. This reduction in general traffic flow has been determined as an overall Positive, Significant and Long-term impact on the direct study area.

For the PM peak hour, Section 6.4.6.2.8.4 General Traffic Flow Difference – PM Peak Hour, identifies that there are no reductions (or increases) in general traffic flows of at least 100 PCUs along the main stretch of Nutley Lane within Section 5 of the Proposed Scheme. As set out in Table 6.64 of Chapter 6 of the EIAR, a reduction in general traffic flows of fewer than 100 PCUs is considered 'Not Significant'. Furthermore, as outlined in Diagram 6.26, for an increase in general traffic flows, only an increase of greater than 100 combined flows was considered for further assessment by way of a traffic capacity analysis on the associated junctions. There is no increase or decrease in general traffic in excess of either of these thresholds in the PM peak hour hence why Diagram 6.28 in Section 6.4.6.2.8.4 of Chapter 6 of the EIAR has neither a blue nor a red line shown for the majority of Nutley Lane for the PM peak hour.

For the AM peak hour, the reduction in traffic flow on Nutley Lane will contribute to efficient operation of junctions once the Proposed Scheme is implemented. Similarly, for the PM peak hour, the change in traffic flows of less than 100 PCUs per hour along the main stretch of Nutley Lane will also enable efficient operation of junctions. The results of the junction analysis illustrated in Table 6.78 of Section 6.4.6.2.8.5 General Traffic Impact Assessment, demonstrate that the majority of junctions continue to operate with a maximum Volume / Capacity (V / C) ratio of below 85% in the Do Something scenario during the PM Peak Hour in the 2043 Design Year. The effect is considered to be Not Significant and Long-term at 159 out of 199 junctions assessed and Imperceptible and Long-term at 29 junctions.

In meeting its objectives, the Proposed Scheme will deliver strong positive impacts in terms of promoting active travel and sustainable transport:

- It will facilitate the proposed increase to the bus network capacity operating along the corridor due to the extensive priority provided;
- the significant segregation and safety improvements to walking and cycling infrastructure will further maximise the movement of people travelling sustainably along the corridor and will therefore cater for higher levels of future population and employment growth.

Given the proposed amendments to the pedestrian, cycling, bus and parking / loading infrastructure outlined above, the Proposed Scheme will have greater capacity to facilitate People Movement along the corridor. A quantitative impact assessment has been undertaken using outputs from the NTA's ERM and LAM, comparing the Do Minimum and Do Something peak hour scenarios for each forecast year (2028, 2043). The results of the assessment demonstrate that there will be an increase in the number of people travelling along the corridor by sustainable modes of 86% and 105% during the 2028 AM and PM Peak respectively. During the 2043 scenario there will be an increase of 113% and 107% in the number of people travelling along the Proposed Scheme by sustainable modes during the AM and PM Peak Hours respectively. The analysis also shows that there will be an increase of 11.3% and 12.3% of bus boarders during the 2028 AM and PM Peak Hours respectively. During the 2043 scenario there will be an increase of 16% and 18% in bus boarders during the AM and PM Peak Hours respectively.

The Proposed Scheme will accommodate access to and from St. Michael's College on Nutley Avenue, by ensuring that connectivity for sustainable transport modes is provided not only on the R118 Merrion Road, but also between the R138 Stillorgan Road and the R118 Merrion Road, i.e. on Nutley Lane itself, which will provide alternative transport options for students leading to less dependency on the private motor car to travel to and from St. Michael's College.

In relation to an overall comprehensive traffic management plan for the greater Nutley area and also references to expected developments in the area, it should be noted that, from a Traffic / Transportation, Air, Noise, etc. perspective, general growth and major infrastructural development has been allowed for in the modelling. The planning data which underpins the traffic modelling for the Proposed Scheme has been derived from the National Development Forecasting Model which accounts for the growth in population and employment across the GDA at an aggregate level for the assessment years 2028 and 2043. This growth is informed by regional growth projections and local development planning data.

St. Vincent's University Hospital (SVUH) is a modelling zone in and of itself due to its size. For the Proposed Scheme, growth is assumed for the National Maternity Hospital (NMH) in both 2028 and 2043, with an employment growth increase of approximately 400 and 700 assumed by 2028 and 2043 respectively. With the provision of infrastructure associated with the Proposed Scheme, the number of car trips over 24 hours accessing the SVUH site reduces from approximately 3,300 car trips in 2020 to approximately 2,000 car trips in both 2028 and 2043. The number of public transport trips over a 24 hour period increases from approximately 1,900 in 2020 to approximately 3,000 and 3,400 in 2028 and 2043 respectively. The planning permission achieved for the NMH included for a new right turn lane from Nutley Lane to the SVUH campus and a right turn lane has also been included for in the Proposed Scheme design.

Overall, it is adjudged that the Proposed Scheme will have a Positive, Very Significant and Long-term effect on the sustainable movement of people along the corridor. The Proposed Scheme will have a Negative, Slight and Long-Term impact on the surrounding road network due to the redistribution of general traffic. Both impacts are considered acceptable given the significant positive impacts the Proposed Scheme will have in relation to sustainable transport modes.

Changes to road layout and increase in bus frequency will result in congestion at key junctions on Nutley Lane

The design and modelling of junctions has been an iterative process to optimise the number of people (rather than vehicles) that can pass through each junction, with priority given to pedestrian, cycle and bus movements. The design for each junction within the Proposed Scheme was developed to meet

the underlying objectives of the Proposed Scheme. Junctions have been designed to ensure a high level of comfort and priority for sustainable modes of travel e.g., walking, cycling and public transport, by prioritising the space and time allocated to these modes within the operation of a junction, and subsequently to accommodate the forecasted future year traffic volumes as safely and efficiently as possible within the remaining space and time. This has allowed the design to maximise the number of people moving through each junction and to prioritise these sustainable modes of travel.

Junctions on the Proposed Scheme have been categorised into 4 types of junction as set out in Appendix A4.1 BusConnects Preliminary Design Guidance Booklet (PDGB) of the EIAR and specifically set out at each location in the Junction Design Report which have been included in Appendix A6.3 and summarised in Table 4.5, Table 4.12, Table 4.18, Table 4.25 and Table 4.32 in Chapter 4 of the EIAR. It should be noted that only junction Types 1 and 3 are proposed for the Proposed Scheme, i.e. neither Junction Type 2 nor 4 are proposed. The junction types set out in the PDGB directly align to the Proposed Scheme core aim and objectives and have been designed using the hierarchy of transport mode users as follows:

1. Pedestrians;
2. Cyclists;
3. Public Transport; and
4. General Traffic.

Section 6.4.6.1.6 of chapter 6 of the EIAR identifies the Qualitative Assessment of Section 5 of the proposed Scheme (Stillorgan Road to Merrion Road – Nutley Lane). A Level of Service (LoS) junction assessment was undertaken using a set of five criteria to determine the impact that the Proposed Scheme has for pedestrians. The results of the impacted junctions on Nutley Lane in table 6.44, demonstrate that the LoS during the Do Minimum scenario consists predominantly of the low D / E ratings. During the Do Something scenario, i.e. following the development of the Proposed Scheme, the LoS consists predominantly of the highest A / B ratings. Overall, the improvements to the quality of the pedestrian infrastructure will have Positive, Significant and Long-term effects across Section 1, 2, 3 and 5 of the Proposed Scheme (including Nutley Lane), and a Positive, Moderate and Long-term effect in Section 4.

The proposed scale of the BusConnects CBC Infrastructure Works will be transformational for cycling in Dublin, delivering a large number of the primary cycling routes identified in the Greater Dublin Area Cycle Network plan. With proposals of this scale, it is critical that the overall design approach matches the stated ambition, and can achieve a longevity that such investment deserves. The Proposed Scheme also consists of measures to enhance the potential for cycling by providing safe infrastructure for cycling, segregated from general traffic (and pedestrians) wherever practicable along the direct study area. Cyclists are a vulnerable road user, but are most vulnerable at junctions, and are therefore a primary consideration when it comes to junction design for the Proposed Scheme. A LoS assessment was undertaken using an adapted version of the NTA's National Cycle Manual Quality of Service (QoS) Evaluation criteria. The results of the Cycling Qualitative Assessment on Nutley Lane in Table 6.45 of Chapter 6 of the EIAR, demonstrate that the LoS during the Do Minimum scenario consists of C ratings. During the Do Something scenario, the LoS consists predominantly of the highest A / A+ ratings. Given the quality of the existing cycling infrastructure along the Proposed Scheme, the improvements will have a Positive, Very Significant and Long-term effect on Nutley Lane.

The typical protected junction layout in Figure 2.9 below offers significant safety improvements compared to the traditional junction layout. The deflection of the cycle track at the junction allows the protection kerb (Note 4) to be positioned on the corner of the junction. In urban locations subject to spatial constraints, the protection kerb provides a tighter turning radius for vehicles and will force the left-turning motorist to reduce speed before making the tighter turn. This design layout also keeps straight-ahead and right-turning cyclists on the raised-adjacent cycle track as far as the junction, avoiding any cyclist-vehicle conflict at weaving and merging lanes, for example, where access to a dedicated left-turn lane would previously have necessitated a vehicle to cross the cycle lane. Right-

turning cyclists will navigate the cycle lane on the junction and turn right (in a controlled manner) after it crosses the side arm. Other benefits to this junction design include:

- Traffic Signal arrangement removes any uncontrolled pedestrian-cyclist conflict;
- Raised and protected cycle track approaching junction;
- Reduced risk of side-swipe due to the removal of cyclist-vehicle conflict at weaving and merging lanes on all approaches;
- Improved right-turning safety; and
- Improved sight lines for left turning traffic.

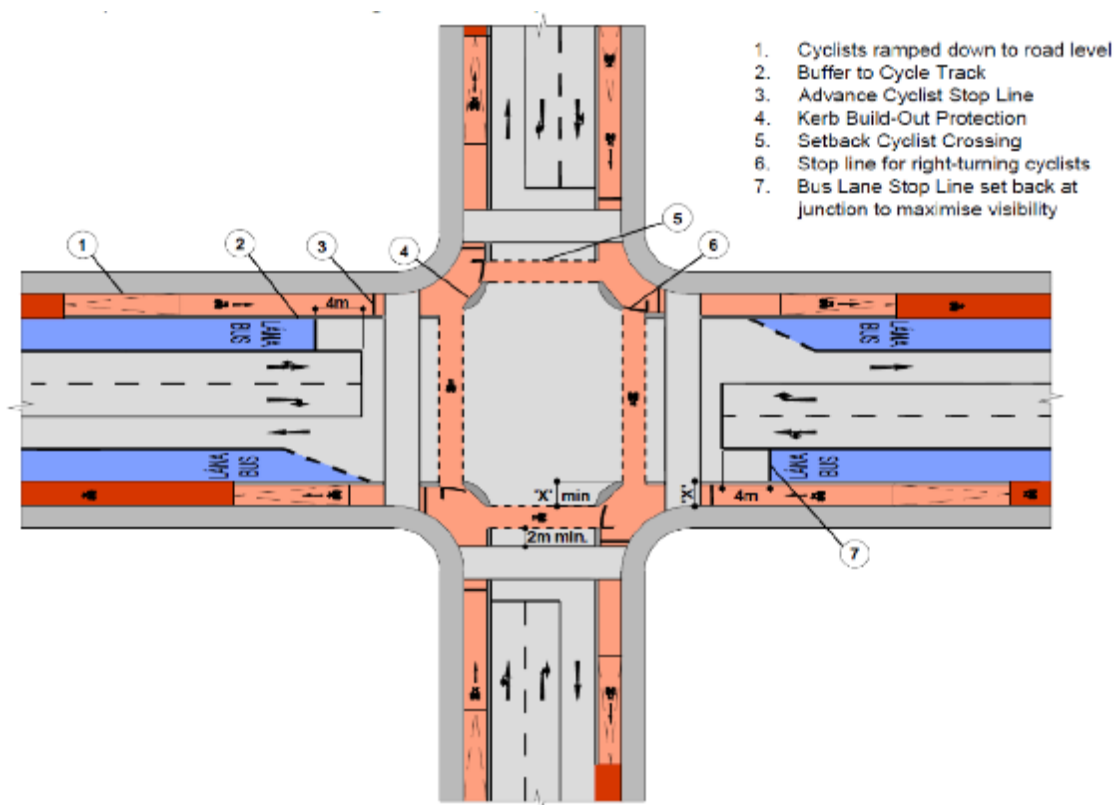


Figure 2.9: Typical Junction Layout from BusConnects Design Guidance Booklet

As indicated above under the heading 'Traffic Congestion', the results of the junction analysis illustrated in Table 6.78 of Section 6.4.6.2.8.5 General Traffic Impact Assessment, demonstrate that the majority of junctions continue to operate with a maximum Volume / Capacity (V / C) ratio of below 85% in the Do Something scenario during the PM Peak Hour in the 2043 Design Year.

The three signalised junctions on Nutley Lane will undergo junction improvements under the Proposed Scheme, striking a balance between safety improvements for pedestrians and cyclists and ensuring that bus journey times are improved as much as is practicable. The following benefits are noteworthy:

- The Nutley Lane / St Vincent's University Hospital junction does not currently have a pedestrian crossing on the north-eastern arm but under the Proposed Scheme, a new Toucan crossing is proposed on this arm to cater for both pedestrians and cyclists. Patrons walking and cycling to/from St. Michael's College on Nutley Avenue, the Merrion Shopping Centre (and adjacent businesses) and St. Vincent's University Hospital (SVUH) will benefit from this improvement measure under the Proposed Scheme. The junction design accommodates connectivity between the proposed two-way cycle track on the south-western arm with the

proposed cycle tracks on either side of the north-eastern arm, through the use of Toucan crossings. The Proposed Scheme also introduces a new right turn lane from Nutley Lane to SVUH in acknowledgment of proposals now permitted under the National Maternity Hospital planning permission.

- The Merrion Road / Nutley Lane junction does not currently have a pedestrian crossing on the north-western arm between the Merrion Shopping Centre and Ailesbury Park but under the Proposed Scheme, a new direct pedestrian crossing is proposed on this arm. Patrons walking between the Merrion Shopping centre and Ailesbury Park, Merrion Village, Our Lady's Queen of Peace Church, etc will benefit from this improvement measure under the Proposed Scheme. On the Nutley Lane arm of this junction, a new direct crossing will replace a staggered crossing which will improve connectivity across this arm including for patrons walking between SVUH and the Merrion Shopping Centre. Left turning and right turning general traffic will turn from a shared lane on Nutley Lane which will allow the bus lane approaching the junction on Nutley Lane to extend all the way to the stop line, improving access to the junction for buses. The existing left turn pocket from Merrion Road to Nutley Lane will be retained as the left turning volumes of general traffic on this approach to the junction are not considered high enough to cause a significant impact on inbound bus progression through the junction. The existing right turn lane from Merrion Road to Nutley Lane will be retained and it is proposed that right turn buses will turn right also from this lane.
- The Stillorgan Road / Nutley Lane junction will undergo junction improvement under the Proposed Scheme. Left turn slip lanes pose a safety risk to pedestrians and cyclists and where practicable, are being removed on sustainable transport corridors. By consolidating the junction through the removal of slip lanes, corner radii can be reduced which acts as a traffic calming measure. The proposed removal of the left turn slip lane from Nutley Lane to the Stillorgan Road will allow for the replacement of the three-stage pedestrian crossing across the Nutley Lane arm of the junction, with a direct crossing of a shorter length. The removal of the slip lane also allows for the continuation of the proposed two-way cycle track on Nutley Lane to the junction with the Stillorgan Road and also the introduction of a proposed cycle only crossing across the south-eastern arm of the junction on the Stillorgan Road. Whilst the existing slip lane from the Stillorgan Road to Nutley Lane is to be retained under the Proposed Scheme, it should be noted that it is proposed to be removed under the separate Bray to City Centre Scheme for the same safety reasons outlined

EIAR Volume 4 Part 2 Appendix A6.3 (Junction Design Report) has been prepared to document the evolution of the design of key junctions along the Proposed Route. In addition, the report presents the junction assessment results for the final scheme design which demonstrates the expected operation of each junction.

The following conclusions have been made on the operation of the final scheme design at the three key junctions on Nutley Lane;

- Nutley Lane / St Vincent's University Hospital junction operates within capacity during AM and PM peak.
- Merrion Road / Nutley Lane junction operates within capacity during AM and PM peak.
- Stillorgan Road / Nutley Lane junction operates over capacity during the AM peak only with Practical Reserve Capacity of -5%.

Access to residential properties

The principle of how residents can access/ egress their properties will remain generally the same once the scheme is operational. At present, all vehicles entering/exiting adjacent properties are required to cross the public footpath to do so. This will remain the case for all properties along the north-western side of Nutley Lane between the R138 Stillorgan Road and Nutley Avenue (e.g. 35- 85 Nutley Lane, Eir, RTÉ) as no cycle track is proposed in front of these properties. Between Nutley Avenue and the R118 Merrion Road, a raised adjacent cycle track is proposed in each direction on

both sides of the road. On the north-western side of the road, access/egress to/from Brooklands and the Merrion Shopping Centre will traverse both the footpath and the proposed cycle track, and motorists will give way to both pedestrians and cyclists. It is noted that there is no existing or proposed access to property on the south-eastern side of Nutley Lane between the R118 Merrion Road and SVUH. Where the two-way cycle track is proposed along Nutley Lane (between SVUH and the R118 Stillorgan Road, access/egress to/from properties (Elm Park Golf and Sports Club, 8-22 Nutley Lane, 118 Stillorgan Road) will traverse the footpath and the proposed two-way cycle track, with motorists giving way to both pedestrians and cyclists.

It is noted that under S.I. No. 182/1997 Section 13 Driving on Footway, a vehicle is allowed to be driven across the footpath for the purpose of access to or egress from a place adjacent to the footpath, and in accordance with S.I. No. 182/1997 Section 14 Cycle Tracks, a vehicle is also allowed to be driven across the cycle track for the purpose of access to or egress from a place adjacent to a cycle track.

It is worth highlighting that the design allows for access to driveways as per Appendix A4.1 BusConnects Preliminary Design Guidance Booklet (PDGB) of the EIAR. Figure 30a illustrates how a two-way cycle track will cross an uncontrolled T-junction. The principle of how the raised kerb between the cycle track and the bus lane is dropped across the side road can be used at driveway so that residents can access / egress their properties. The Road Safety Audits undertaken for the Proposed Scheme, included as Appendix M of the Preliminary Design Report provided in the Supplementary Information did not highlight any safety issues with the proposed arrangement in this regard.

With regard to the positioning of the proposed two-way cycle track on the south-eastern side of Nutley Lane, the following is noteworthy:

- The proposed two-way cycle track between SVUH and the R138 Stillorgan road was first introduced during the second round of non-statutory public consultation in March 2020. Two options for Nutley Lane between SVUH and the R138 Stillorgan Road were presented within the draft Preferred Route Option (PRO) at the time. Option A consisted of a footpath on the north-western side of the road, with a bus lane and a general traffic lane in each direction, and a two-way cycle track on the south-eastern (golf course) side of the road between VUH and Nutley Park. A Toucan crossing was proposed at Nutley Park where the two-way cycle track swapped over to the RTÉ side of the road and continued to the R138 Stillorgan Road on that side, where it tied in with the Bray to City Centre cycle track proposals at the junction.
- Option B was the same as Option A, with the only difference being that only one general traffic lane was proposed in Option B in the uphill direction towards the R138 Stillorgan Road. Neither Option A or B proposed a footpath on the south-eastern (golf course) side of the road.
- For both Option A and Option B, one of the primary reasons that the proposed two-way cycle track was proposed on the golf course side between SVUH and Nutley Park was to minimise the number of properties that the cycle track interacted with, i.e. to minimise vehicle–cyclist conflict where cyclists cycle across a driveway at 35- 85 Nutley Lane. Locating the cycle track on the south-eastern side of Nutley Lane between SVUH and Nutley Park would result in only 4 properties instead of 23 properties (plus Broc House) being accessed across the cycle track.
- Option A was brought forward to the third round of public consultation in November 2020 which retained the Toucan crossing at Nutley Park to swap the two-way cycle track from the golf course side to the RTÉ side of Nutley Lane.
- Figure 2.10 below is from the third round of public consultation in November 2020, shown in the Public Consultation Report 2018-2022 within the Supplementary Information. Map 11 illustrates that the proposed two-way cycle track swaps over from the golf course side of Nutley Lane to the RTÉ side at the junction with Nutley Park and continues to the R138 Stillorgan Road on that side, where it ties in with the Bray to City Centre proposals at the junction.

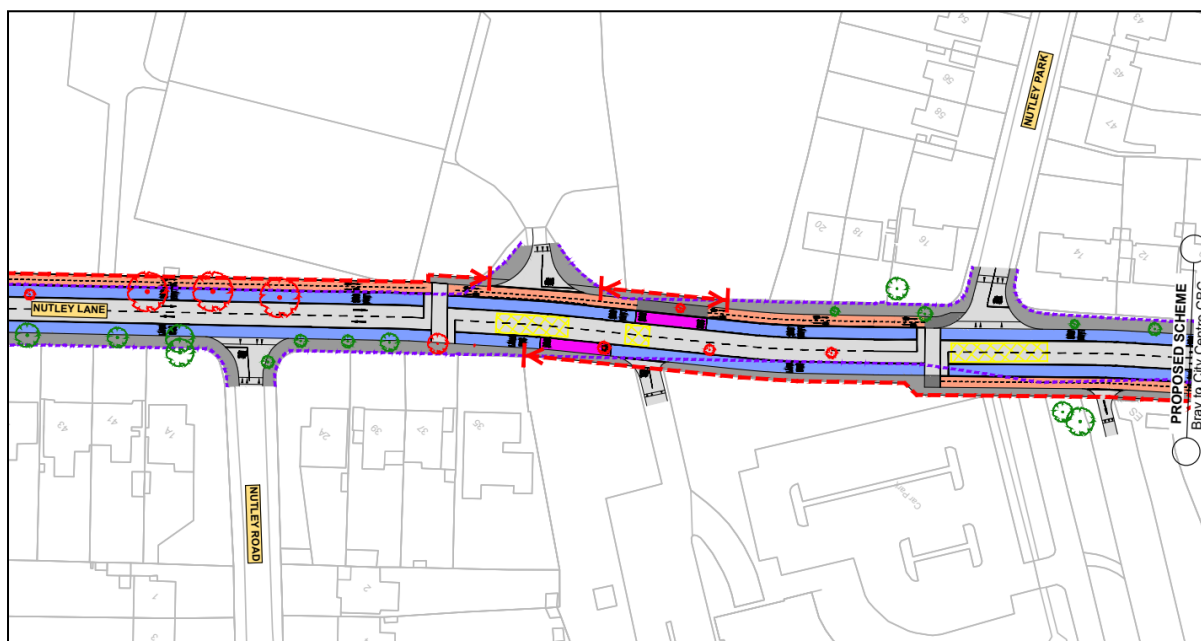


Figure 2.10: Extract of Map 11 of the draft PRO for the 3rd Round of Public Consultation on Nutley Lane

- The current design proposal of the Proposed Scheme includes the continuation of the two-way cycle track on the golf course side of Nutley Lane all the way to the R138 Stillorgan Road. This is due to the latest design development for the Bray to City Centre Scheme which now has a proposed two-way cycle crossing of the south-eastern arm of the junction on the R138 Stillorgan Road.
- The proposed continuation of the two-way cycle track on the golf course side of Nutley Lane all the way to the R138 Stillorgan Road avoids the need for the previously-proposed Toucan crossing at Nutley Park.
- The proposed continuation of the two-way cycle track on the golf course side of Nutley Lane all the way to the R138 Stillorgan Road, will now interact with five additional properties (and not eight as suggested by some submissions), noting that the proposed two-way cycle track was always proposed in front of the three properties between Nutley Park and the entrance to the golf club.

It is further noted in EIAR Volume 4 Part 2 Appendix A6.3 (Junction Design Report), that the provision of this cycle track on the south-eastern side of Nutley Lane ties-in with proposals under the Bray to City Centre Scheme at the Nutley Lane / R138 Stillorgan Road junction. The proposed two-way crossing of the southern arm of the R138 Stillorgan Road allows for the Proposed Scheme to be delivered independently of the Bray to City Centre CBC Scheme but also future-proofs the junction design to ensure both schemes can operate together, should both be permitted.

2.1.3.5 *Impact on property values*

Summary of Issue

Some submissions raised the concern that the Proposed Scheme will have a negative impact on property values of residential homes along Nutley Lane. Stating that the desirability to live on Nutley Lane will vastly diminish by the provision of a bus corridor.

Response to issue

The aim of the Proposed Scheme is to provide enhanced walking, cycling and bus infrastructure on this key access corridor in the Dublin region, which will enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor. The Proposed Scheme will greatly improve transport services for all that live along the route of the Proposed Scheme, including on

Nutley Lane, by providing significantly improved sustainable transport options. Furthermore, it is an objective of the Proposed Scheme to ensure that the public realm is carefully considered in the design and development of the transport infrastructure and seek to enhance key urban focal points where appropriate and feasible.

EIAR Chapter 10 Population includes Appendix A10.2 Economic Impact of the Core Bus Corridors. Section 3 on page 14 of the appendix discusses the envisaged impact of the Proposed Scheme on property prices along the route. The conclusion reached is that in overall terms the public realm improvements planned by the NTA may in fact lead to an increase in value of both residential and retail property prices, especially in the community centres along the corridors.

The report notes:

“Evidence shows that investing in public realm creates nicer places that are more desirable for people and business to locate in, thereby increasing the value of properties in the area.”

and

“Residents along the corridors will also see a measurable increase in their quality of life, with evidence showing that residents are willing to pay more for an improved public realm.”

Based on the above text, it is believed that a combination of improved connectivity as a result of the dedicated public transport infrastructure being rolled out by the proposed scheme as well as public realm improvements, will not have a negative impact on values of residential properties on Nutley Lane but are more than likely to contribute to an increase in property value along the proposed core bus corridor.

2.1.3.6 *Impact on community and character of Nutley Lane* Summary of Issue

Many submissions expressed concerns that the Proposed Scheme will have a detrimental impact on the community and character of Nutley Lane. Submissions state that the Proposed Scheme will vastly increase bus frequencies which will contribute to an increase in noise and air pollution. It has also been stated that the provision of bus lanes and cycle tracks will divide the Nutley Lane community into two, with Elm Park Golf Club on one side and the rest of the Nutley community on the other. A number of submissions also state that the Proposed Scheme will ruin the character of Nutley Lane as a quiet residential street.

Response to issue

During the development of the Proposed Scheme, the NTA has carried out a significant non-statutory public consultation exercise with the objective of ensuring all interested parties, including local communities, had the opportunity to express their opinions on the proposals put forward as part of the Proposed Scheme. This public consultation process is summarised in the EIAR Volume 2 Chapter 1, Introduction. Part of this public consultation involved setting up dedicated Community Forums for community representatives and elected representatives, to provide a forum at which community interests could be outlined and considered. Meetings with local residents groups have also been facilitated during the non-statutory public consultation process.

As a result of this consultation process, additional options were considered and assessed as outlined in EIAR Volume 2 Chapter 3, Consideration of Reasonable Alternatives, in part due to the feedback received from local communities, including those on Nutley Lane. The NTA has balanced the concerns raised with the objectives of the Proposed Scheme in determining the Preferred Route Option for the Scheme. It is noted that the significantly improved facilities for buses and active travel modes on Nutley Lane will serve the local community, as well as the wider catchment area, in using more sustainable travel modes.

EIAR Volume 2 Chapter 10 Population, Section 10.4.4.1.1 considers Community Amenity impacts, which arise from a combination of traffic, air quality, noise, and visual impacts. It concludes that following the implementation of the Proposed Scheme, there will be a reduced air and noise impact along the route in general, leading to a positive, not significant, long-term impact.

As outlined in the EIAR Volume 2 Chapter 7, Air Quality, and described in more detail in section 2.1.3.2 above, the overall residual effects of the Proposed Scheme on air quality are neutral and long-term while the residual effect on noise and vibration is considered positive to neutral. The Proposed Scheme aims to provide an attractive alternative to the private car and promote a modal shift to public transport, walking and cycling.

The aims and objectives of the Proposed Scheme, including along Nutley Lane, are underpinned by the central concept and design philosophy of 'People Movement'. People Movement is the concept of the optimisation of roadway space and / or the prioritisation of the movement of people over the movement of vehicles along the route and through the junctions along the Proposed Scheme. The aim being the reduction of journey times for higher person-carrying capacity modes (bus, walking and cycling), which in turn provides significant efficiencies and benefits to users of the transport network and the environment. EIAR Chapter 6 (Traffic and Transport) Table 6.44 (Figure 2.11 below) demonstrates that the scheme will have a long-term positive impact on the quality of the pedestrian infrastructure between Nutley Lane and the R118 Merrion Road.

Junctions	Chainage	Do Minimum LoS	Do Something LoS	Impact	Sensitivity	Significance of Effect
R138 Stillorgan Road / Nutley Lane / Greenfield Park Signalised Junction	B-050	F	D	Medium	Medium	Positive Significant
Nutley Lane / RTE Car Park Exit Priority Junction	B025	D	B	Medium	Low	Positive Moderate
Nutley Lane / Nutley Park Priority Junction	B050	D	B	Medium	Low	Positive Moderate
Nutley Lane / Elm Park Golf Club and Sports Club Car Park Access Priority Junction	B175	D	B	Medium	Medium	Positive Significant
Nutley Lane / Nutley Road Priority Junction	B225	D	B	Medium	Low	Positive Moderate
Nutley Lane / Elm Park Priority Junction	B350	D	B	Medium	Low	Positive Moderate
Nutley Lane / Broch House Suites Access Priority Junction	B375	D	B	Medium	Low	Positive Moderate
Nutley Lane / St Vincent's Hospital Access Signalised Junction	B575	D	A	Medium	High	Positive Very Significant
Nutley Lane / Nutley Avenue Priority Junction	B625	D	A	High	Low	Positive Moderate
Nutley Lane / Brooklands Residential Development Access Priority Junction	B675	C	B	Low	Low	Positive Slight
Nutley Lane / The Merrion Shopping Centre Priority Junction	B725	D	B	Medium	Medium	Positive Significant
Section Summary		D	B	Medium	Medium	Positive Significant

Figure 2.11: Nutley Lane - Significance of Effects for Pedestrian Impact during Operational Phase

The key pedestrian infrastructure improvements along Nutley Lane that contribute to the improved Level of Service (LoS) are aligned with the current urban street design guidelines and with the principal design guidelines outlined in the Design Manual for Urban Roads and Street (DMURS). The improvements are summarised as follows:

- Footpath with a minimum running width of 2.0m;
- Removal of the left turn slip lane from Nutley Lane to the R148 Stillorgan Road and conversion to a single dedicated signalised crossing;
- Raised table treatments provided on priority side roads where the stop/ yield line is located behind the raised table and footpath crossing to encourage a "courtesy crossing" for pedestrians; and

- Reduction to junction turning radii on priority side roads to encourage slower egress and ingress.

Section 6.4.6.1.6.1 of EIAR Chapter 6 describes the improvements to pedestrian infrastructure along Nutley Lane.

The Proposed Scheme reduces general traffic lane widths to 3.0m, from the existing average width of 4.25m. This, along with provision of roadside landscaping and the already described upgrades to pedestrian infrastructure will contribute to a calmer traffic environment. As outlined in Section 2.1.3.4 above under the 'Traffic and Access Issues' heading, the Proposed Scheme also provides for a new pedestrian and cyclist crossing outside Elm Park Golf and Sports Club along with upgrading the existing pedestrian crossing at the junction with Stillorgan Road and the R118 Merrion Road (Nutley Lane arms) as well as providing a new Toucan crossings (for both pedestrians and cyclists) where none exists currently on the north-eastern arm (across Nutley Lane) of the St. Vincent's University Hospital junction and a new pedestrian crossing where none exists currently on the north-western arm of the R118 Merrion Road junction.

The NTA has taken into consideration all concerns regarding the impact of the Proposed Scheme on the Nutley Lane community and following a comprehensive review of the impacts outlined in the EIAR, the improvements to walking and cycling infrastructure along with bus service improvements result in an overall enhancement to the local community. The NTA recognises the importance of assigning higher priority to pedestrians and cyclists, without unduly compromising vehicle movement, in order to create secure, connected places that work for all members of the community. Walking and cycling will improve health and well-being and will provide greater opportunities for interaction which promote neighbourliness and community growth.

EIAR Volume 2 Chapter 10 Population, Appendix 10.2 contains a report prepared by EY outlining the Economic Impact of the Core Bus Corridors. This report outlines the benefits of the Proposed Scheme in terms of Community Health and Wellbeing and Social Cohesion, including the paragraphs quoted below:

"The development of new walking and cycling infrastructure will have a positive impact on the health of all those along the corridors who walk and cycle more as a result of these improvements. "Access to good-quality, well-maintained public spaces can help to improve our physical and mental health by encouraging us to walk more, to play sport, or simply to enjoy a green and natural environment. In other words, our open spaces are a powerful weapon in the fight against obesity and ill-health"

"Public transport offers people, particularly those at a disadvantage, the opportunity to access jobs and services. As a result, communities can become more fair and equitable. Research from the UK has found that the provision of good public transport networks can create civic participation, connectivity, and health and wellbeing which can all contribute to addressing the wider societal challenges of exclusion and isolation."

and

"Transport is an important facilitator for social inclusion and wellbeing which, in turn, can affect economic and social outcomes. Public transport can connect people to essential services like healthcare facilities which is particularly important for vulnerable groups. It also allows access to non-healthcare activities that are beneficial for physical and mental health and for social connection and wellbeing¹¹, for example this can include connections to family, friends, jobs, amenities and hobbies. Social inclusion is the ability for an individual to participate and be an active member of the local community."

Based on the above, the NTA believe that the Proposed Scheme will not have a negative impact on the community and character of Nutley Lane but rather it will contribute positively to the community through improved public realm and cycle provision as well as improved connectivity as a result of the dedicated public transport infrastructure being rolled out by the proposed scheme.

2.1.3.7 Pedestrian and Cyclist Safety

Summary of Issue

Several submissions raised concerns regarding the safety implications of the Proposed Scheme, stating that the proposals will increase the volume of traffic at Nutley Lane, compromising safety for pedestrians and cyclists, especially school children and the elderly. Another concern raised refers to the cycle infrastructure proposed at St. Vincent's University Hospital, stating that the lack of continuity may encourage cyclists to avoid the designated crossings and continue on the road, resulting in safety risks.

Response to issue

The aim of the Proposed Scheme is to provide enhanced walking, cycling and bus infrastructure on this key access corridor in the Dublin region, which will enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor. The proposed scale of the BusConnects CBC Infrastructure Works will be transformational for walking and cycling in Dublin, delivering a large number of the primary cycling routes identified in the Greater Dublin Area Cycle Network plan. With proposals of this scale, it is critical that the overall design approach matches the stated ambition, and can achieve a longevity that such investment deserves. With this in mind, the NTA set about developing 'Design Principles' for the project. These principles would complement existing documents and standards such as the National Cycle Manual and the Design Manual for Urban Roads and Streets (DMURS). A Preliminary Design Guidance Booklet (Refer to Appendix O to the Preliminary Design Report in Supplementary Information) was developed to outline the agreed design principles and to enable consistency of design.

The PDGB draws on international best practice from countries at the forefront of active travel infrastructure design and delivery such as the Netherlands, Denmark and the UK and has been peer reviewed by international experts from each of these countries. The Proposed Scheme has been designed in accordance with the PDGB and other best practice guidance documents to ensure that all designs are safe and comfortable for pedestrians and cyclists, in line with the road user hierarchy set out in DMURS.

An independent, Stage 1 Road Safety Audit was carried out on the Proposed Scheme by PMCE and is included in Appendix M to the Preliminary Design Report. This audit did not envisage any safety issues with respect to the pedestrian and cyclist facilities proposed on Nutley Lane.

EIAR Volume 2 Chapter 6, Traffic and Transport documents the baseline conditions with respect to walking and cycling on Nutley Lane and assesses the Proposed Scheme against this baseline. In relation to pedestrian facilities the results of this assessment demonstrate that the Level of Service (LoS) for pedestrians in the Do Minimum (existing infrastructure) scenario is typically of D rating. In the Do something (Proposed Scheme) scenario this LoS typically increases to a B rating, and in some cases an A rating. This is categorised as a Positive, Significant and Long-term impact in terms of the level of service of pedestrian facilities on Nutley Lane.

In relation to cycling facilities the results of this assessment demonstrate that the LoS for cyclists in the Do Minimum (existing infrastructure) scenario is of D rating throughout. In the Do something (Proposed Scheme) scenario this LoS increases to an A rating throughout. This is categorised as a Positive, Very Significant and Long-term impact in terms of the level of service of cycling facilities on Nutley Lane.

As outlined in Section 2.1.3.3 above, the proposed two-way cycle track on Nutley Lane has been designed to minimise land take to the Elm Park Golf and Sports Club and located so as to minimise interaction with vehicular access and egress to driveways and also to provide future connectivity to the proposed cycle facilities under the proposed Bray to City Centre Core Bus Corridor Scheme. Two of the three signalised crossings at the junction of Nutley Lane and St. Vincent's University Hospital are proposed to be Toucan Crossings, to cater for both pedestrians and cyclists, to ensure continuity of connection between the two-way cycle track and the single direction cycle track approaching the R118 Merrion Road.

Chapter 6 of the EIAR also does not identify a significant increase (>100 combined traffic flows) in traffic volumes on Nutley Lane as a result of the Proposed Scheme. In the 2028 AM peak traffic volumes are reduced by 220 PCU when comparing the Do Minimum and the Do something scenarios. In the 2028 PM peak traffic volumes do not exceed the 100 combined traffic flows to be deemed significant.

2.1.3.8 *Replacing the existing boundary fence at Elm Park Golf and Sports Club with a concrete wall*

Summary of Issue

Several submissions raised concerns over the removal of existing boundary fence along with hedgerows adjacent to Elm Park Golf Club and replacing it with a concrete wall with hanging vegetation. Submissions stated that the Proposed Scheme will negatively impact on the visual quality of Nutley Lane. The choice of construction material for the wall was also queried, suggesting that brick or stone are more suitable materials.

Response to issue

The aim of the Proposed Scheme is to provide enhanced walking, cycling and bus infrastructure on this key access corridor in the Dublin region, which will enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor. In delivering a feasible scheme which achieves this stated aim, the NTA has had to balance a number of often-competing factors. With respect to the proposed land acquisition and associated removal of the boundary fence and hedgerows adjacent to Elm Park Golf and Sports Club, EIAR Volume 2 Chapter 3 Consideration of Reasonable Alternatives, outlines the comprehensive options assessment process which has been carried out in arriving at the Preferred Route Option for the Proposed Scheme. The Preferred Route Option was identified as Option NL2, comprising two bus lanes and two traffic lanes along the majority of Nutley Lane, along with a two-way cycle track. While other options did perform well under many criteria, the expected impacts in relation to Transport Quality & Reliability and Traffic Network Integration were considerably more than in the preferred option.

EIAR Volume 2 Chapter 17, Landscape (Townscape) & Visual of the EIAR has considered the potential landscape and visual impacts associated with the Construction and Operational Phases of the Proposed Scheme. During the Construction Stage the residual impact on Nutley Lane in terms of townscape/streetscape character has been categorised as Negative, Significant/Very Significant and Temporary/Short Term. During the Operational Stage the residual impact on Nutley Lane in terms of townscape/streetscape character has been categorised as Negative, Slight/Moderate and Long Term.

The Chapter concludes that the Proposed Scheme has been subject to an iterative design development process which has sought insofar as practicable to avoid or reduce negative impacts, including townscape and visual impacts. Nevertheless, the Proposed Scheme will give rise to some degree of townscape and visual effect, most notably during the Construction Phase. These impacts arise especially where there is temporary and / or permanent acquisition of lands associated with residential or other properties including amenities, and where tree removal is required. The Proposed Scheme includes for replacement of disturbed boundaries, reinstatement of the Construction Compound, return of temporary acquisition areas, and for additional tree and other planting where possible along the Proposed Scheme.

In the Operational Phase residual effects will remain for properties experiencing permanent land acquisition and in the loss of trees along all sections of the Proposed Scheme, excluding the section from Ballsbridge to Merrion Square. However, the Proposed Scheme will also provide for a significantly enhanced level of service for public transport and for pedestrian / cycle connectivity.

With respect to the choice of material for the proposed boundary wall along the Elm Park Golf and Sports Club, this was developed in consultation with representatives from the Elm Park Golf and Sports Club. The proposed reinforced concrete wall offers improved security to the Elm Park Golf and Sports Club, replacing a post and chainlink fence at the same height. A new hedgerow will be reinstated on the golf course side of the proposed wall of a height to match the existing hedge. Climbing vegetation (for example, ivy) is proposed on the road side of the wall to offer aesthetical

improvement to the roadside face of the reinforced concrete wall. Figure 2.12 below shows a photomontage from Appendix A17.2 in Volume 4 of this EIAR of the proposed wall from the roadside on Nutley Lane.



Figure 2.12: Do Something Photomontage of the proposed wall from the roadside on Nutley Lane

2.1.3.9 Changes to Commuting Patterns Summary of Issue

Several submissions outlined their concerns about the changes to travel patterns as a result of the COVID-19 pandemic, suggesting that pre-pandemic public transport demands will not be restored in part due to the rise in remote working.

Response to issue

The following is noted in Section 2.1 of Chapter 2 of the EIAR, in relation to the effect of COVID-19:

“The COVID-19 pandemic brought about a short-term change in travel patterns in the Greater Dublin Area (which led, for example, to fewer people using public transport and more people working from home). Travel demand and patterns of travel have now started to return to pre-pandemic levels and are anticipated to grow in line with population growth. The impacts on travel demand and patterns of travel are still dependent on the quality of the transport system, in particular the reliability of a bus service that is not constrained by general traffic congestion.”

2.2 Proposed Scheme on Pembroke Road

2.2.1 Description of Proposed Scheme at this Location

As set out in EIAR Volume 2 Chapter 4 Proposed Scheme Description, on Pembroke Road, from Elgin Road to Northumberland Road, the Core Bus Corridor provision for dedicated public transport priority is continued with an inbound and an outbound bus lane proposed on both sides of the road. No bus lanes are provided on the section of Pembroke Road between Northumberland Road and Eastmoreland Place, with bus priority through this section provided by a bus gate which is proposed on Pembroke Road, between the Eastmoreland Place and Waterloo Road junctions. Only public transport, cyclists, pedestrians and authorised vehicles will be permitted to travel through the bus gate in either direction during the hours of operation. The bus gate will ensure that buses travelling on the core bus corridor on this section of Pembroke Road are not impacted by having to share lanes with general traffic and will also ensure that the improved journey times projected for public transport under the Proposed Scheme are achieved

This reduced quantum of lanes avoids any permanent land take along Pembroke Road which means that existing boundary treatments of historical and heritage value will be retained, existing trees will be retained, with some on-street parking also retained. The existing footpath width along this section of the Proposed Scheme will also be retained and/or widened where practicable.

2.0m wide cycle tracks are proposed on Pembroke Road where practicable but it is proposed to reduce the width of the cycle tracks to 1.5m locally in places, in order to facilitate the retention of a number of existing trees along this section of Pembroke Road. A single general traffic lane is proposed in both directions also.

At the junction of Pembroke Road, Northumberland Road and Lansdowne Road, a right turn lane will be introduced from Pembroke Road onto Lansdowne Road to replace the right turn movement at Ballsbridge Junction (Pembroke Road to Shelbourne Road) that will be removed as part of public realm improvement in the village. The western approach to the Pembroke Road, Northumberland Road and Lansdowne Road junction will be reduced from two lanes to one lane. The existing slip lane which currently allows inbound traffic to bypass the junction, will be removed, resulting in all traffic being brought up to the junction to turn left on to Pembroke Road towards Baggot Street Upper. The existing kiosk which is currently located on the existing splitter island on the southwestern corner of the junction will be relocated nearby to the new proposed urban realm as part of the proposed works. Any existing services to the existing kiosk will be retained at the new location.

Access to Pembroke Road, between Northumberland Road and Eastmoreland Place, during the hours of operation of the proposed bus gate, will be maintained via the Lansdowne Road junction. Local access will also be maintained via Eastmoreland Place, Wellington Road and Raglan Road. Offline traffic management measures at Clyde Lane and at the Herbert Park / Pembroke Park junction are also proposed to prevent through traffic diverting inappropriately and will safeguard the proposed level of service of the core bus corridor.

Extracts from drawing set **2. General Arrangement** and drawing set **5. Landscape General Arrangement**, which are provided as an appendix to Chapter 4 in Volume 3 of the EIAR, are included below in Figure 2.13, Figure 2.14, Figure 2.15 and Figure 2.16. A number of photomontages have been prepared which document the visual impact of the scheme post implementation and show the improvements to the public realm within the area. These photomontages are included in Figure 17.2 of Volume 3 of the EIAR, and are reproduced below in Figure 2.17, Figure 2.18, Figure 2.19 and Figure 2.20.

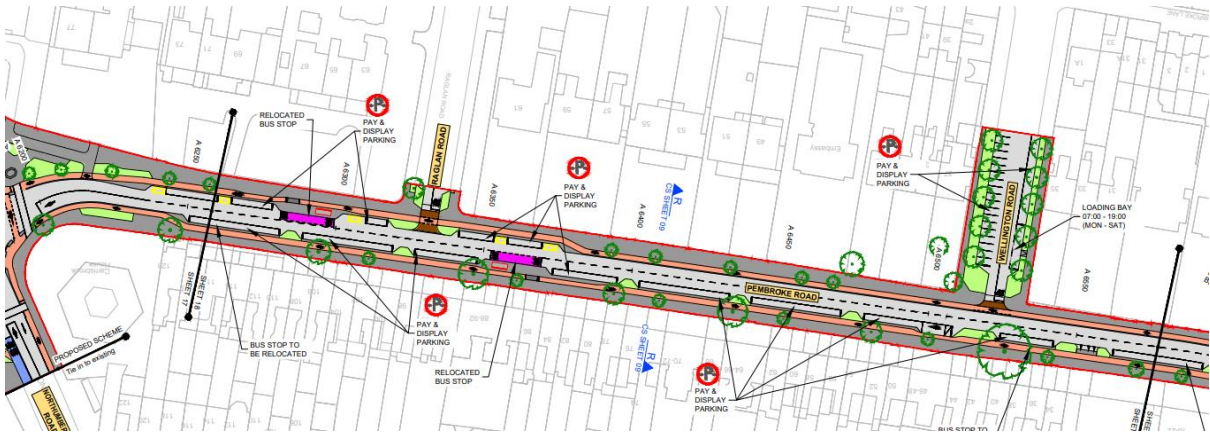


Figure 2.13: Extract from General Arrangement Drawing

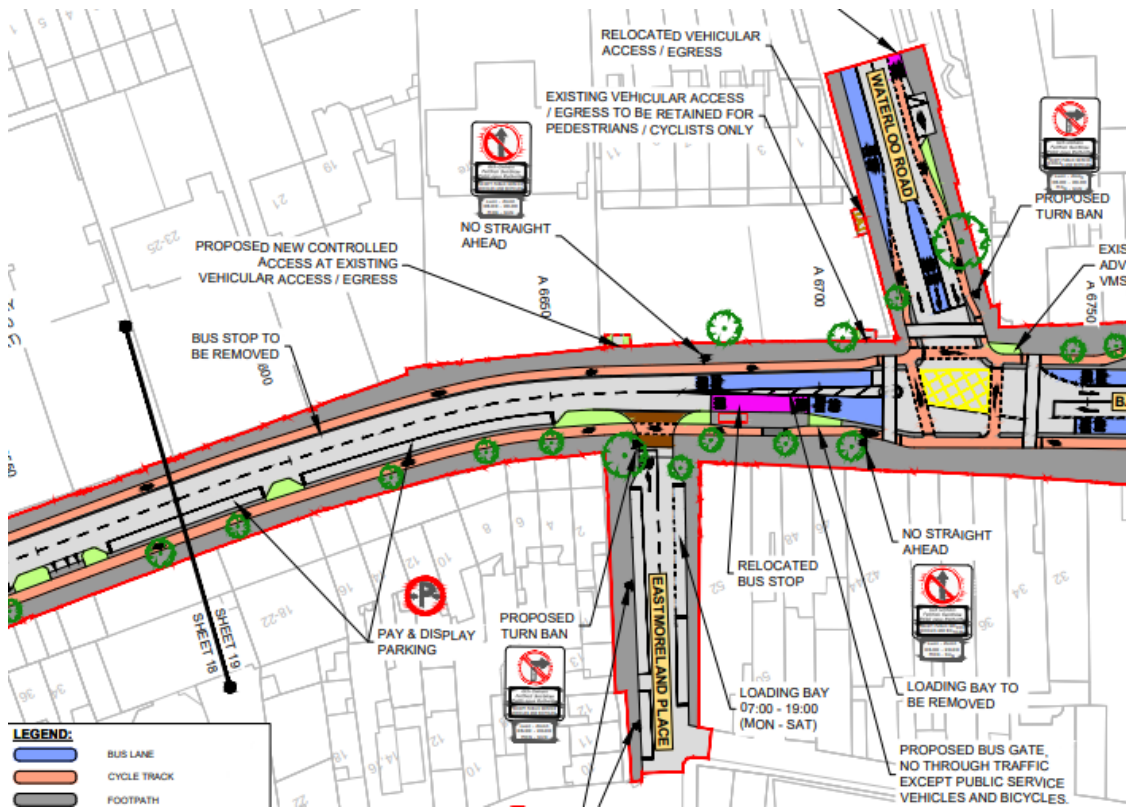


Figure 2.14: Extract from Landscape General Arrangement Drawing

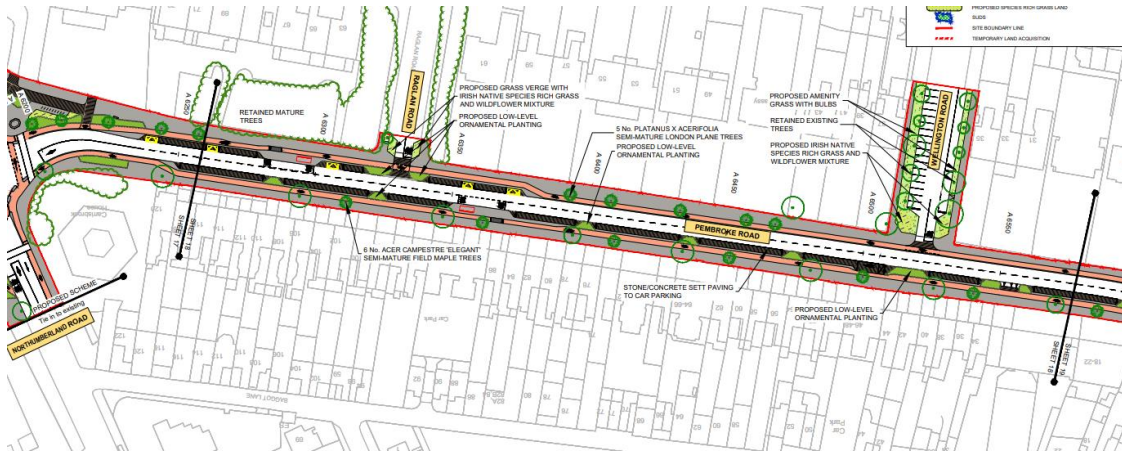


Figure 2.15: Extract from Landscape General Arrangement Drawings 1

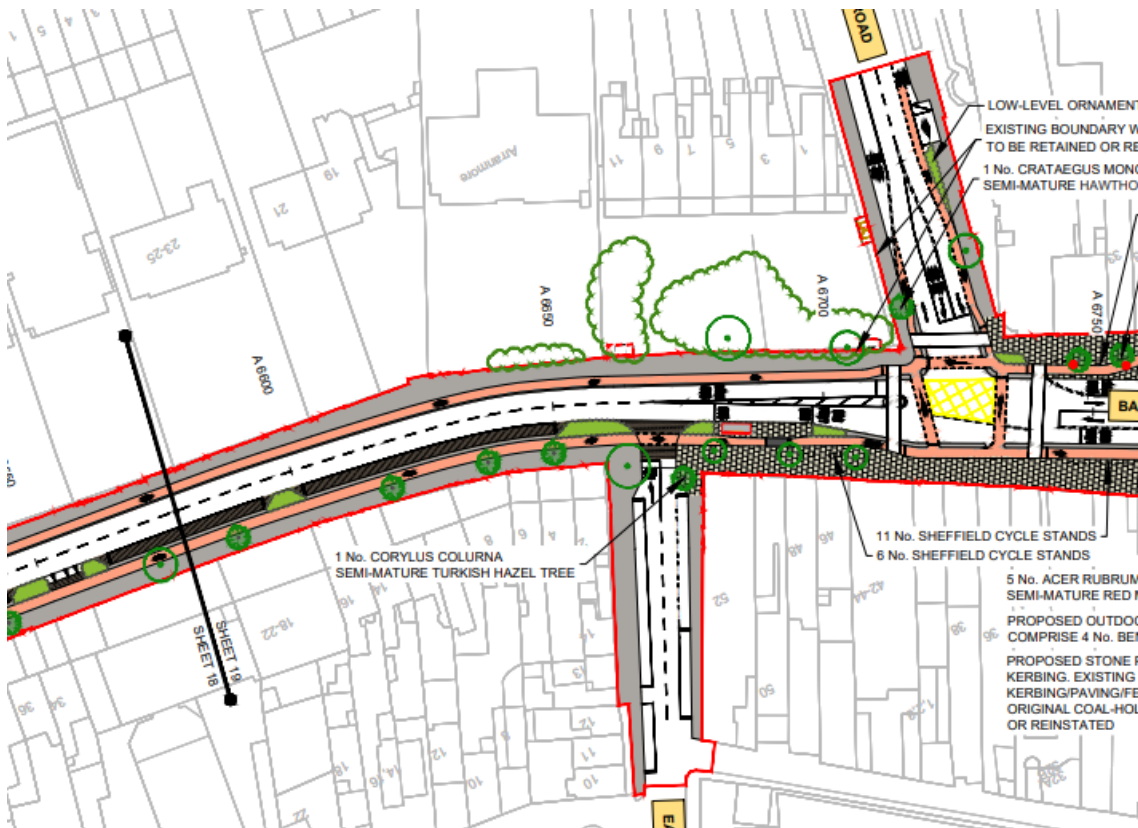


Figure 2.16: Extract from Landscape General Arrangement Drawings 2



Figure 2.17: Pembroke Road - View 1, Existing Situation



Figure 2.18: Pembroke Road – View 1, Post-Implementation of the Proposed Scheme



Figure 2.19: Pembroke Road - View 2, Existing Situation



Figure 2.20: Pembroke Road - View 2, Post-Implementation of the Proposed Scheme

2.2.2 Overview of Submissions Received

Table 2.2 below lists the 14 individual submissions made in relation to the Proposed Scheme at this location.

Table 2.2: Submissions Made in Respect of Baggot Street Upper

No	Name	No	Name
3	J.W Bailey	64	Maura Moore / Joseph O'Reilly
13	Maurice Cavanagh	70	Cyril Mulligan / Susan Mulligan
19	Anthony Coughlan	77	Garrett O'Neil
26	John Dorman & others	81	Pembroke Road Association
27	Stephen Doyle	91	Anne-Marie Taylor
37	Conor Gallagher	93	Barbara Tomaz
48	Andrew Keaveney	96	Eileen Vaughan

It is noted that a further 12 submissions were appended to the submission made by the Pembroke Road Association as listed below which have also been included in this assessment:

Susan McCarrick

Robert Walsh

Eamon O'Farrell

June Lambert

Matthew O'Farrell

Elizabeth Murray

Paul Murray

Stephen Murray

Bernie Traynor

Paul Harrison

Esther Murnane / Dorinda Kavanagh

Mary Costello

2.2.3 Common Issues Raised

2.2.3.1 *Routing of the Proposed Scheme on Pembroke Road and Baggot Street Upper* Summary of issue

A number of submissions voiced concern at the proposed routing of the Proposed Scheme along Pembroke Road and Baggot Street, and noted that a more suitable route would be via Northumberland Road and Mount Street. A number of submission highlighted that McCartney Bridge was older than Mount Street Bridge and voiced concerns that it was unsuitable for large volumes of buses, due to its 'humpback' nature. Some submissions asserted that a route via Northumberland Road was more direct than the route of the Proposed Scheme.

Response to issue

Chapter 2 of the EIAR, Need for the Scheme, sets the context for the transport need for the Proposed Scheme. It is noted in section 2.2.1.6 of this chapter that:

“The Dublin Area Bus Network Redesign Revised Proposal (October 2019) (NTA 2019) presented information on ‘patterns of demand’. Image 2.5 is an extract of the Combined Activity Density map for areas local to the Proposed Scheme, which combines residential, employment, and student enrolment densities to approximate the total effect of all densities in representing potential demand for public transport.”

Figure 2.21 and Figure 2.22 are extracted from Chapter 2 of the EIAR and present the combined activity density along the route of the Proposed Scheme. It is noted that the combined activity density map referenced in Chapter 2 is extracted from the BusConnects Dublin Area Bus Network Redesign Revised Proposal Report. It is evident from these figures that there is a greater combined activity density along the route of the Proposed Scheme, i.e. along Pembroke Road and Baggot Street Upper, when compared with the alternative route raised in these submissions, i.e. along Northumberland Road and Mount Street.

The Preferred Route Option (PRO) report included in the Supplementary Information further outlines the justification for the route of the Proposed Scheme via Pembroke Road, as outlined below:

“It is considered that the options assessment presented in the ‘Dún Laoghaire to City Centre Core Bus Corridor Options Study – Feasibility and Options Assessment’ has appropriately assessed route options and that the selected corridor offers the most benefits for pedestrians, cyclists, and buses. That assessment compared route options via Pembroke Road and Northumberland Road. The route via Pembroke Road was considered to be the preferred route forming the EPR Option.

The UCD Ballsbridge to City Centre Section of the Proposed Scheme is routed via Pembroke Road for reasons including the following:

- *To improve the integration with new and existing sustainable transport facilities on the street itself and through Baggot Village;*
- *To provide cycle facilities on the Secondary Route of the GDA Cycle Network Plan; and*
- *To increase the catchment of the Proposed Scheme in terms of Combined Activity Density – refer to Figure 3.2 within Chapter 3.2.2.1 of this report.”*

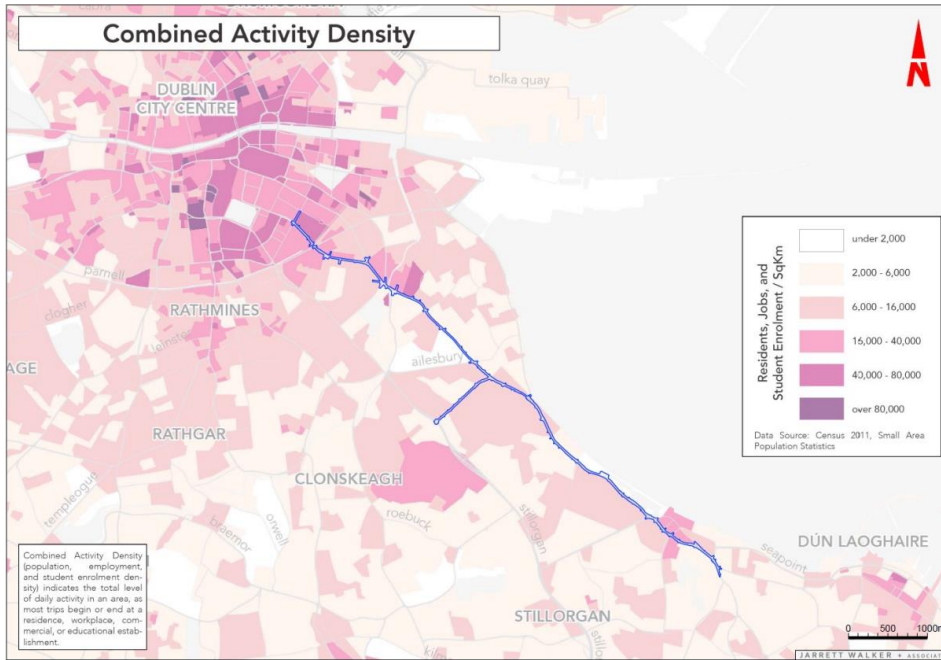


Image 2.5: Combined Activity Density Map (Dublin Area Bus Network Redesign Revised Proposal (NTA 2019)). Proposed Scheme Highlighted in Blue for Information.

Figure 2.21: Combined Activity Density Map



Figure 2.22: Annotated Extract from Combined Activity Density map in the Baggot Street Upper Area

Chapter 3 of the EIAR, Consideration of Reasonable Alternatives, outlines the Options Assessment process in determining the Preferred Route Option. During the initial assessment stage, the Proposed Scheme consisted of two separate Core Bus Corridors (CBCs), namely the Dún Laoghaire to City Centre CBC and the Ballsbridge to UCD CBC. These CBCs were subsequently combined to form the Proposed Scheme. In determining the Emerging Preferred Route (EPR), the Dún Laoghaire to City

Centre CBC scheme was divided into three sub-sections (Study Area Section - SAS) for further assessment and refinement (see Figure 2.23). As noted, the third section, SAS3 was included in the original assessment but subsequently removed from the Proposed Scheme.

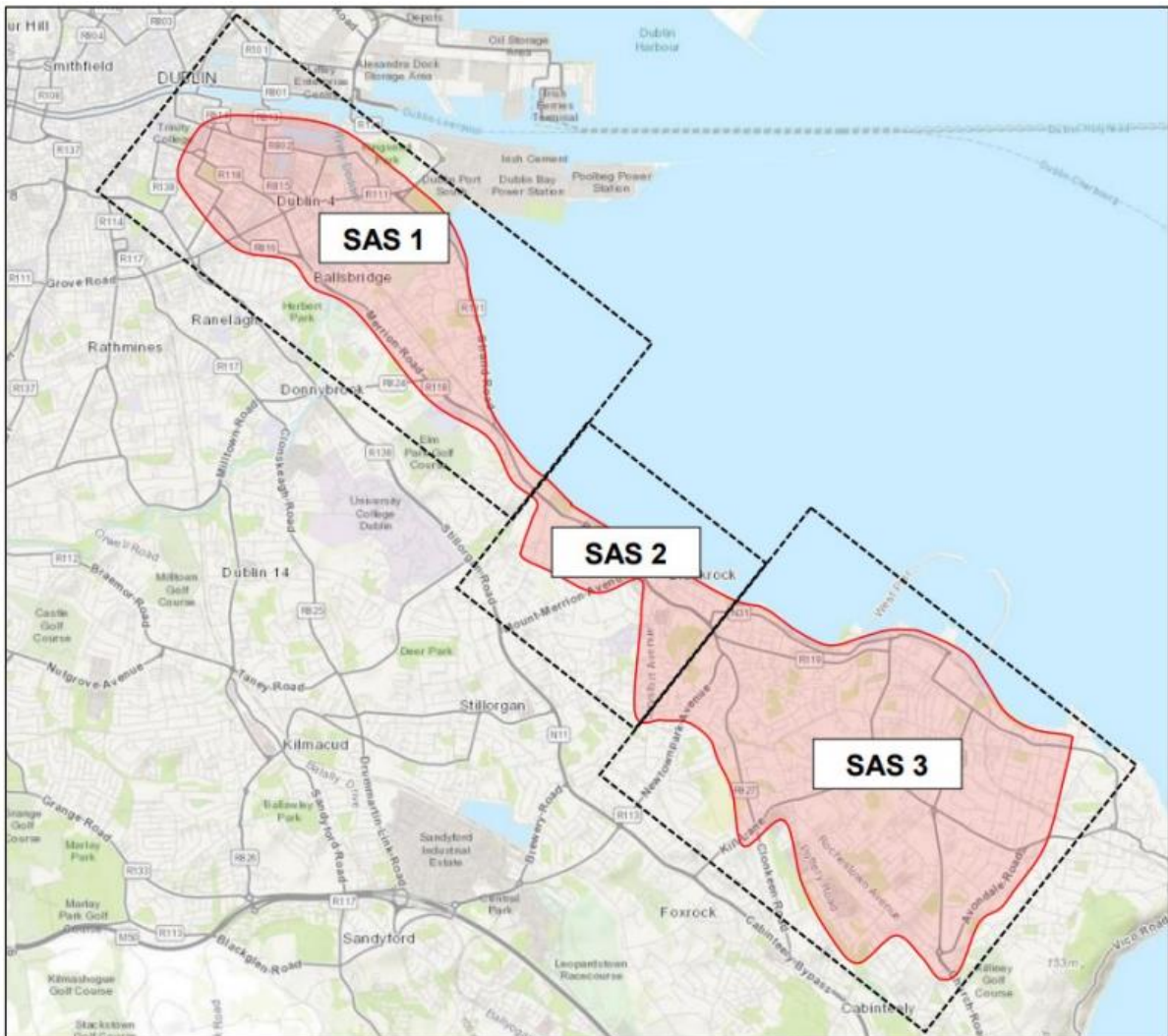


Figure 2.23: Stage 2 Route options sub-section division extracted from ‘Dún Laoghaire to City Centre Core Bus Corridor Options Study – Feasibility and Options Assessment’

In relation to sub-section SAS1, following the Stage 1 sifting process, two viable route options for sub-section SAS1, were taken forward for assessment and further refinement:

- Route Option N1: A route option via Merrion Road, Pembroke Road and Baggot Street Lower; and
- Route Option N2: A route option via Merrion Road, Northumberland Road and Merrion Square North.

These routes are presented in Figure 2.24.

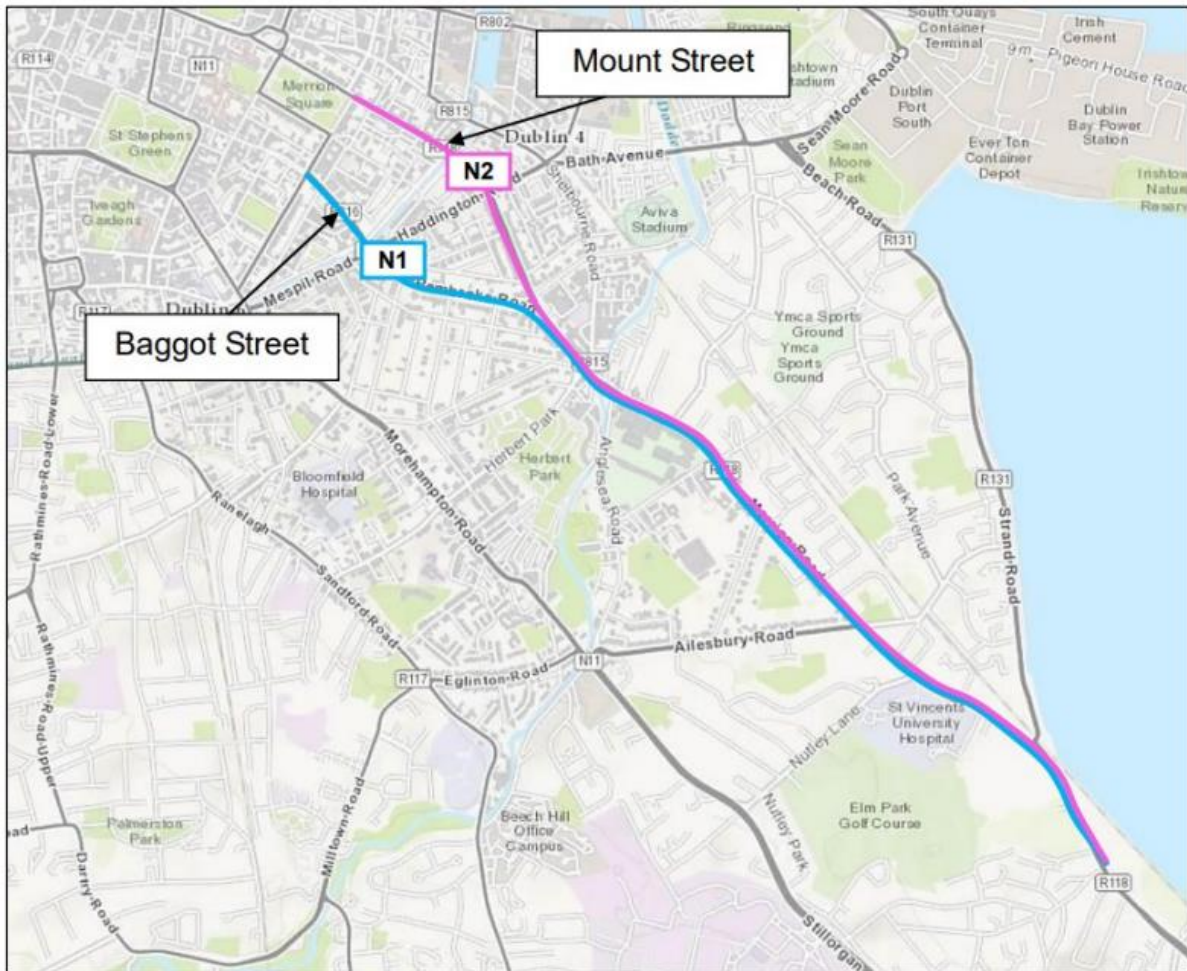


Figure 2.24: Stage 2 Route options sub-section division extracted from ‘Dún Laoghaire to City Centre Core Bus Corridor Options Study – Feasibility and Options Assessment’

Two scheme options were considered along each route which would provide traffic lanes, bus lanes and cycle tracks in each direction. The primary difference between these scheme options was the treatment at the junctions (Option 2 of each route required buses to share with left-turning traffic at junctions). The four options considered within this section were:

- **Route N1 Option 1:** A route via Merrion Road, Pembroke Road and Baggot Street Lower, with bus priority provided to the stop line at junctions;
- **Route N1 Option 2:** A route via Merrion Road, Pembroke Road and Baggot Street Lower, where buses share with left-turning traffic at junctions;
- **Route N2 Option 1:** A route via Merrion Road, Northumberland Road and Merrion Square North, with bus priority provided to the stop line at junctions; and
- **Route N2 Option 2:** A route via Merrion Road, Northumberland Road and Merrion Square North, where buses share with left-turning traffic at junctions.

The assessment sub-criteria which were differentiators between scheme options included Capital Cost, Transport Reliability and Quality, Residential Population and Employment Catchments, Traffic Network Integration and Land Use Character.

Route N1 Option 2 was identified as having significant benefits over other options in relation to both Capital Cost and Land Use Character. Following a detailed MCA, route N1 Option 2 was identified as the preferred option for this section and was brought forward into the Emerging Preferred Route.

In terms of capital cost, Route, N1 Option 2 was identified as the lowest costing due to the reduced level of land acquisition required.

When the options were considered under the Land Use Character sub-criteria, Route N1 Option 1 and Route N1 Option 2 (via Pembroke Road and Baggot Street Upper), were considered to have some advantages when compared to Route N2 Option 1 and Route N2 Option 2 (via Northumberland Road) with Route N1 Option 2 presenting further advantages over Route N1 Option 1. In all four options, a large number of trees and on-street parking provision was expected to be affected, however, to a greater extent on the Route N2 Options via Northumberland Road. Route N1 Option 2 was therefore considered to have advantages under this criterion given the lower impact on existing land use character.

Route Option 2 was identified as the Emerging Preferred Route for this section of the Proposed Scheme. Route Option 2 was therefore brought forward into the overall Emerging Preferred Route. This option was subsequently confirmed as the Preferred Route Option for this section of the Proposed Scheme.

Figure 2.25 below is an extract from Table 6.4 of Appendix H1 Dún Laoghaire to City Centre Core Bus Corridor Options Study Feasibility and Options Assessment Report in the Supplementary Information, and summarises the multi-criteria analysis undertaken to assess option 1 and 2 for route N1 and option 1 and 2 for route N2.

MCA criteria	Assessment Sub-Criteria	N1 Option 1	N1 Option 2	N2 Option 1	N2 Option 2
Economy	1.a. Capital Cost	Green	Green	Yellow	Green
	1.b. Transport Reliability and Quality (Journey Time)	Green	Yellow	Green	Yellow
	2.b. Residential Population and Employment Catchments	Yellow	Yellow	Green	Green
	2.e. Traffic Network Integration	Green	Green	Yellow	Yellow
	6.i. Land Use Character	Green	Green	Yellow	Yellow

Figure 2.25: SAS 1 Route Options Assessment Summary (Main Criteria)

The BusConnects Dublin Area Bus Network Redesign Revised Proposal Report includes combined activity density maps which highlight the significant combined activity density along the Pembroke Road/Baggot Street Upper route, including within the urban village of Baggot Street Upper. Subsequently, the route option assessment determined the advantages provided by a route along Pembroke Road and Baggot Street Upper, compared to a route along Northumberland Road

In relation to the McCartney Bridge, the Proposed Scheme prioritises walking, cycling and buses crossing this bridge. As such, the Proposed Scheme design in this location successfully meets the objectives of the Proposed Scheme. It is further noted that Table 6.65 in Chapter 6, Traffic and Transport, of the EIAR, lists road links which experience a reduction in general traffic flows in 2028 following the implementation of the Proposed Scheme. As shown in Figure 2.26 below, Baggot Street Upper experiences a reduction of 952 PCUs in the peak hour, while Baggot Street Lower experiences a reduction of 317 PCUs. As such, significantly fewer vehicles will be crossing the bridge following the implementation of the Proposed Scheme than currently do.

Table 6.65: Road Links that Experience a Reduction of ≥ 100 Combined Flows during 2028 AM Peak Hour (Direct Study Area)

Location	Map I.D.	Road Name	Do Minimum Flows (PCUs)	Do Something Flows (PCUs)	Flow Difference (PCUs)
Section 1 – R827 Stradbroke Road to L1003 Booterstown Avenue	S.1	Temple Hill	1,643	608	-1,035
		Temple Road	867	380	-488
		Frascati Road	1,754	680	-1,074
		Rock Road South of Booterstown	1,819	938	-881
Section 2 – L1003 Booterstown Avenue to Nutley Lane	S.2	Rock Road North of Booterstown	2,160	1,178	-981
Section 3 – R118 Merrion Road to Ballsbridge	S.3	Merrion Road South of Nutley Lane	1,431	781	-651
		Merrion Road North of Nutley Lane	2,420	1,545	-875
Section 4 – Ballsbridge to Merrion Square	S.4	Pembroke Road	1,085	101	-984
		Baggot Street Upper	1,274	322	-952
		Baggot Street Lower	430	113	-317
		Fitzwilliam Street Upper	665	316	-349
Section 5 – R138 Stillorgan Road to R118 Merrion Road – Nutley Lane	S.5	Nutley Lane	1,112	892	-220

Figure 2.26: Extract from Chapter 6 of the EIAR outlining road links which experience traffic reduction during the 2028 AM Peak Hour

In relation to structural loading on the bridge, it is further noted that due to the reduction in cross-sectional width of the trafficked area on the bridge, that the number of vehicles crossing the bridge at any given time will be significantly reduced following the implementation of the Proposed Scheme (the trafficked area will be approximately halved from approximately 12m to approximately 6m).

2.2.3.2 *The proposed bus gate and associated traffic impacts* Summary of issue

A number of submissions highlight the proposed bus gate on Pembroke Road and note that this will have a detrimental effect on the Pembroke Road area, through the restriction of access by private vehicle to the Baggot Street area and associated businesses.

Response to issue

The NTA note the comments raised in relation to the proposed bus gate on Baggot Street Upper. The rationale for the provision of this bus gate is outlined in Section 3.4 of Chapter 3 of the EIAR, Consideration of Reasonable Alternatives. As outlined above in response to Common Issue 2.3.3.1 above, a route along Pembroke Road and Baggot Street Upper was identified as the Emerging Preferred Route for the Proposed Scheme.

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

- New and updated topographical survey information;
- Output from engagement and consultation activities on the Emerging Preferred Route and draft Preferred Route Option proposals;
- Further design development and options assessment; and
- Changes in the extent of the scheme.

Where substantial revisions had been made to the design since the publication of the Emerging Preferred Route, options were assessed using Multi-Criteria Analysis (MCA) to determine the

Preferred Route Option. The MCA assessed any newly developed options against the previously identified Emerging Preferred Route. The methodology and MCA used were consistent with that carried out during the initial route optioneering work (including consideration of the relevant environmental aspects), which informed the identification of the Emerging Preferred Route.

One such area where alternative design options were developed and assessed was Pembroke Road and Baggot Street Upper. Section 3.4.1.1.2 of Chapter 3 of the EIAR summarises this options assessment process as follows:

“The EPR Option along Pembroke Road (between Baggot Street Upper to Northumberland Road) would impact on mature trees and antique railings. Consultation also identified safety concerns around narrowed footpaths as well as the importance of the local on-street parking for residents. Four options were assessed, as follows:

- **Option PR1:** EPR Option with the road realigned to remove impact on existing access steps to properties on the northern side and reappportion all land acquisition to the southern side of the road (4 lane cross-section + cycle tracks + parking);
- **Option PR2:** Removal of land acquisition on the northern side as per PR1, however, with removal of all parking along the section, including removal of space between parking bays for tree planting (4 lane cross-section + cycle tracks);
- **Option PR3:** Removal of land acquisition on the northern side as per PR1, however, with only a one-way outbound traffic lane and with Bus Lanes and cycle tracks in each direction (3-lane cross-section + cycle tracks + parking); and
- **Option PR4:** Introduction of a single Bus Gate between Waterloo Road and Eastmoreland Place with two general traffic lanes from there to the Northumberland Road junction, with retention of all trees and no impact to property boundaries (2-lane cross-section + cycle tracks + parking).

The preferred option was identified as Option PR4 – comprising the provision of two traffic lanes and a Bus Gate at the western end of Pembroke Road. Compared to the alternative options, this option will not require permanent land take from adjacent protected structures and other structures of significant heritage value through road widening nor on-street mature tree removal and will retain and, in some areas, widen footpaths, which has further benefit for large footfall in the area during major sporting and concert events.

In terms of the sub-criteria under the Environment criterion, the preferred option performed significantly better than the other options in relation to Flora & Fauna as it does not require the removal of any trees, whereas the others required the removal of a significant number of trees. In terms of Air Quality and Noise & Vibration, the preferred option again performed the best as it removes significant volumes of traffic from the road and reduces the carriageway width.

In terms of Architectural Heritage, Landscape & Visual and Land Use Character, the preferred option does not require tree removal nor permanent land acquisition and was ranked the highest under these categories. This option also retains the highest amount of parking. Each of the other options require land acquisition from properties that are on the record of protected structures and tree removal along the street. In these options existing parking volumes are also significantly reduced.

The preferred option performed equally to all other options in the remaining sub-criteria under Environment.

As such is it noted that the preferred option scored significantly higher under the environmental criteria compared to the other options, and overall it best met the Proposed Scheme objectives when compared to the other options. It is noted that other options were also considered in the area but were not carried forward to the MCA for the reasons briefly outlined below:

- Option of reversing the direction of the proposed one-way general traffic in Route Option PR3. This option was examined and sifted out as the outbound direction was considered to be the better option for a one-way road. This is primarily due to Pembroke Road’s proximity to the city

centre, which would have a higher probability of becoming congested more often if there are a higher quantity of inbound general traffic streets in comparison to outbound general traffic streets. This could, in turn, impact on bus operations within the city centre core;

- Option of removing cycle tracks on Pembroke Road and providing an off-line cycle route. This option was examined but not considered a viable solution due to a number of factors. Firstly, Pembroke Road is defined as a primary cycle corridor in the GDA Cycle Network Plan. In addition, alternative routes were examined in order to determine if suitable cycle routes could be facilitated on a number of adjacent streets and lanes, but each of these routes were found to not meet the criteria of a primary cycle track under criteria including directness, safety and attractiveness and comfort; and
- Option of providing one-way general traffic outbound (as in Route Option PR3) yet with the removal of all on-street parking (as in Route Option PR2). This option was examined and sifted out, as such an option was not expected to offer the same benefits arising from a Bus Gate arrangement, in terms of Environmental criteria (with the Bus Gate option PR4 scoring higher in all Environmental sub-criteria with the exception of Soils, Geology & Hydrogeology under which it was neutral), while sharing negatives arising from both the one-way arrangement being assessed (regarding Traffic Integration) and the removal of parking being assessed (regarding loss of parking under Land Use Character)."

All reasonable alternatives for this section of the Proposed Scheme have been considered. Furthermore, the Preferred Route Option best meets the objectives of the Proposed Scheme and performs the best under the assessment criteria as outlines in the 'Common Appraisal Framework for Transport Projects and Programmes' published by the Department of Transport, Tourism and Sport (DTTAS), March 2016.

In relation to access to the businesses on Baggot Street Upper, access to these businesses by sustainable modes will be greatly improved following the implementation of the Proposed Scheme as well as the amendments to the bus network service routing, with expected bus journey time reductions, more dependable bus services and increases in the frequency of bus services across the network as a whole. This serves to achieve the aim of the Proposed Scheme which is to provide enhanced walking, cycling and bus infrastructure on this key access corridor in the Dublin region, which will enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor. It is further noted that a significantly enhanced public realm is also proposed including new tree planting, bicycle parking (27 Sheffield stands with space for 52 bicycles) and spill out areas that will establish a more cohesive village environment and with high quality materials that reflect those of the traditional built environment. Access by private vehicle will still be possible to both the Pembroke Road and Baggot Street Upper area outside of the hours of operation of the bus gate. It is noted that general traffic access to Baggot Street Upper will be maintained at all times, however during the hours of operation of the bus gate, general traffic will not be able to access Baggot Street Upper from Pembroke Road.

2.2.3.3 *Loss of car parking*

Summary of issue

A number of submissions highlighted concerns with the removal of car parking on Pembroke Road and the impact that this would have on local residents in particular.

Response to issue

Section 6 of Appendix G Parking Survey Report in the Supplementary Information, outlines the impact of the Proposed Scheme on parking and loading on Pembroke Road and its side streets. This is summarised in section 6.4.6.1.5.4 of Chapter 6 of the EIAR, Traffic and Transport, which sets out the impact on parking and loading within this section of the Proposed Scheme. The following is noted in this regard:

“Removal of approximately 29 of the 67 general residential pay & display and permit parking spaces along the R816 Pembroke Road between Pembroke Lane and Wellington Road to provide controlled sections of parking bays. This enables more orderly parking practices, provides build out at bus stop islands and allows the cycle track to move off-road to bypasses both the on-street parking retained at this location and the bus stop islands. The residential properties on the southern side of the road typically have off-street car parking, whereas the properties on the northern side rely on the on-street parking provision. Additionally, there is ample alternative parking along adjacent streets of Raglan Road and Wellington Road within 100m of this location. It is therefore considered that retaining 38 on-street parking spaces is sufficient to serve the needs of the residential properties along this section, and the impact of the loss of parking is considered to have a Negative, Slight and Long-term effect;

Removal of six of the 22 residential pay & display and permit parking and the loading bay along the R816 Pembroke Road between Wellington Road and Waterloo Road to provide improvements for pedestrian and cyclists in the form of widening the footpath and reallocating road space to provide cycle tracks in both directions. A new loading bay accommodating two loading spaces will be created on Wellington Road and there is ample alternative parking along the R816 Pembroke Road to the east, and along Eastmoreland Place directly adjacent to this location. Therefore, the impact of this loss of parking is to have a Negative, Slight and Long-term effect;

Provision of an additional seven residential pay & display and permit parking spaces (and one loading bay with two spaces) along Wellington Road by converting the parallel parking to side-by-side spaces perpendicular to the kerb to replace some of the parking lost along this section;”

This section of the EIAR further goes on to state:

“Furthermore, the Proposed Scheme is considered to allow for significant improvement to the walking, cycling and bus facilities encouraging the use of sustainable modes of transport, that will ultimately reduce the demand for parking along with the availability of adjacent parking.”

In developing the design of the Proposed Scheme, the NTA has balanced the need to provide parking and loading within this constrained urban location with the objectives of the Proposed Scheme to provide high quality public transport, cycling and walking facilities through this area. As such, some parking spaces have been removed or relocated in close proximity to its current location. It is noted that within this section of the Proposed Scheme (between Ballsbridge and Merrion Square) that there are approximately 650 additional parking spaces within 200m of the Proposed Scheme.

It is envisaged that the implementation of the Proposed Scheme will serve to improve connectivity to the Pembroke Road area by sustainable modes of transport including walking, cycling and the bus. As such the demand for parking in this location is expected to reduce following the implementation of the Proposed Scheme. It is further noted that 9 Sheffield stands with space for 18 bicycles are proposed at the junction of Northumberland Road and Pembroke Road, as part of the Proposed Scheme. This will facilitate those accessing the area by bicycle.

2.2.3.4 Impact on Properties of heritage and architectural significance

Summary of issue

A number of submissions highlight that the Proposed Scheme will have impacts on properties of significant heritage and architectural significance. Submissions reference the Georgian nature of Pembroke Road and state that the Proposed Scheme will have a significant impact on the character of the street. The provision of parking protected cycle tracks is referenced as a negative visual impact. A number of submissions make reference to the proposed alterations to historic railings at 1-11 Pembroke Road.

Response to issue

The aim of the Proposed Scheme is to provide enhanced walking, cycling and bus infrastructure on this key access corridor in the Dublin region, which will enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor. EIAR Volume 2 Chapter 3, Consideration of Reasonable Alternatives, outlines the comprehensive options assessment process which has been carried out in order to arrive at the Preferred Route Option for the Proposed Scheme.

In relation to Pembroke Road, the Emerging Preferred Route (EPR) Option consisted of a cross-section including two bus lanes, two general traffic lanes, two cycle tracks, parking on the northern side of the carriageway and two footpaths.

The EPR Option along Pembroke Road (between Baggot Street Upper to Northumberland Road) would impact on mature trees and antique railings. Consultation also identified safety concerns around narrowed footpaths as well as the importance of the local on-street parking for residents. Four options were assessed, as follows:

- **Option PR1:** EPR Option with the road realigned to remove impact on existing access steps to properties on the northern side and reapportion all land acquisition to the southern side of the road (4 lane cross-section + cycle tracks + parking);
- **Option PR2:** Removal of land acquisition on the northern side as per PR1, however, with removal of all parking along the section, including removal of space between parking bays for tree planting (4 lane cross-section + cycle tracks);
- **Option PR3:** Removal of land acquisition on the northern side as per PR1, however, with only a one-way outbound traffic lane and with Bus Lanes and cycle tracks in each direction (3-lane cross-section + cycle tracks + parking); and
- **Option PR4:** Introduction of a single Bus Gate between Waterloo Road and Eastmoreland Place with two general traffic lanes from there to the Northumberland Road junction, with retention of all trees and no impact to property boundaries (2-lane cross-section + cycle tracks + parking).

The preferred option was identified as Option PR4 – comprising the provision of two traffic lanes and a Bus Gate at the western end of Pembroke Road. Compared to the alternative options, this will not require permanent land take through road widening nor on-street tree removal and will retain and, in some areas, widen footpaths. In terms of Architectural Heritage, Landscape & Visual and Land Use Character, the preferred option does not require tree removal or permanent land acquisition and was ranked the highest under these categories. This option also retains the highest amount of parking. Each of the other options require land acquisition from properties that are on the record of protected structures and tree removal along the street. In these options existing parking volumes are also significantly reduced. It is noted that the parking removed is all public, on-street parking. There is no impact on private parking spaces.

As outlined above, significant efforts have been made to minimise impacts on Architectural Heritage, Landscape & Visual and Land Use Character on Pembroke Road, while achieving the objectives of the Proposed Scheme to deliver bus priority and active travel infrastructure on this key corridor.

EIAR Volume 2 Chapter 17, Landscape (Townscape) & Visual, documents the potential landscape (townscape) and visual impacts associated with the Construction and Operational Phases of the Proposed Scheme. The assessment concludes that the residual impacts during the Construction Stage will be Negative, Very Significant and Temporary / Short-Term. During the operational Phase the residual impact will be Positive, Moderate / Significant and Long-Term.

A number of photomontages have been prepared which document the visual impact of the scheme post implementation and show the improvements to the public realm within the area. These photomontages are included in Figure 17.2 of Volume 3 of the EIAR, and are reproduced below in Figure 2.27, Figure 2.28, Figure 2.29 and Figure 2.30.



Figure 2.27: Pembroke Road - View 1, Existing Situation



Figure 2.28: Pembroke Road - View 1, Post-Implementation of the Proposed Scheme



Figure 2.29: Pembroke Road - View 2, Existing Situation



Figure 2.30: Pembroke Road - View 2, Post-Implementation of the Proposed Scheme

With respect to the comments relating to parking protected cycle tracks, the assessment has not highlighted a visual impact from the proposal to route cyclists behind parked vehicles. This design is in line with Appendix O Preliminary Design Guidance Booklet (PDGB) of the Preliminary Design Report in the Supplementary Information which states:

“Where parking is provided along the CBC, the preferred location for raised adjacent cycle tracks is between the pedestrian footpath and any proposed parking spaces to provide additional protection for cyclists.”

This is also in line with international best practice for high-quality cycling infrastructure. The UK Department for Transport document Cycle Infrastructure Design (LTN 1/20) notes the following in this regard on page 59:

“Providing a cycle track between parked vehicles and the footway provides a much higher level of service in terms of safety and comfort than having a cycle lane on the offside of parking/loading areas; and requires no additional width.”

EIAR Volume 2 Chapter 16, Architectural Heritage, documents the potential architectural heritage impacts associated with the Construction and Operational Phases of the Proposed Scheme. This assessment concludes that once the mitigation measures have been implemented, there will be no significant residual impact on the architectural heritage resource, as a result of the Construction Phase of the Proposed Scheme. There will be no significant residual impact on the architectural heritage resource, as a result of the Operational Phase of the Proposed Scheme.

With regard to numbers 1-11 Pembroke Road, EIAR Volume 2 Chapter 16 notes the following:

“The alteration of the entrances to 1 Pembroke Road (DCC RPS 6552) will have an impact on the setting of numbers 1 to 11 Pembroke Road (DCC RPS 6552, 6554, 6556, 6558, 6560, 6562, odd numbers only) protected structures of Regional Importance and Medium Sensitivity, during the Operational Phase. The Magnitude of the impact is Low. The potential Operational Phase impact is Indirect, Negative, Slight and Long-term.”

and

“Two further locations were identified where it is proposed that access, egress and gates to protected structures will be altered. These include the relocation of the vehicular entrance gate to the former Pembroke Town Hall (DCC RPS 5084) to Anglesea Road and relocation of the existing egress from 1 Pembroke Road (DCC RPS 6552) onto Waterloo Road. The existing gate will be retained as a pedestrian entrance. The pre-mitigation Construction Phase impact is Negative, Moderate and Permanent. The mitigation is for recording and labelling the affected sections of the boundary treatments in detail prior to the commencement of construction works. The existence of a pedestrian gates in the location of the proposed vehicular entrances will help mitigate the loss of historic fabric as the existing gates will be adapted. The existing gates are to be taken down along with the end posts, sections of railing and plinths. The north end post to the pedestrian gate on Anglesea Road will be retained in position. Removed sections of historic fabric are to be stored safely for reuse. The southern end posts are to be reinstated in the widened entrances. The removed railings will be adapted to form gates to match the existing pedestrian gates. The existing and new gates will be reinstated. Historic fabric which is not directly affected by the proposed landscaping works or works to the gates, such as adjoining sections of railing, or other architectural heritage features will be protected during the course of works. The kerbs or edging to the flower beds will be recorded and labelled before being carefully removed by the appointed contractor and stored for reuse in the proposed landscaping. Recording is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor. The architectural heritage specialist will oversee the labelling, taking-down and reinstatement of the affected gates, railings, piers, bricks and masonry. Works to historic fabric will be carried out in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR. The resulting vehicular entrances with double leaf gates will retain much of the existing historic fabric and will be in keeping with the Protected structures and the adjoining streetscapes. The reinstatement of historic fabric will reduce the magnitude of impact from Medium to Low. The predicted residual impact is Direct, Negative, Slight and Long-term.”

As such, it is noted that the impact on this property will be slight and balancing this with the realisation of the aims and objectives of the Proposed Scheme, this impact is considered to be acceptable.

2.2.3.5 Impacts on the businesses in the area

Summary of issue

A number of submissions raised concerns about the potential impacts of the Proposed Scheme on businesses in the area. Some of these submissions cited removal of parking and loading and the proposed bus gate in their submission and these issues are dealt with separately in other responses. Other submissions referred more generally to the negative impact of the Proposed Scheme on their businesses.

Response to issue

The Proposed Scheme on Pembroke Road and Baggot Street Upper proposes a significant number of improvements that will not only improve the movement of people through the area by sustainable modes, but improve the general amenity of the area by enhancing its sense of place and strengthening its position as a destination in its own right. These include:

- Significant widening of footpaths on the northern side of the street with some localised widening on the southern side;
- An additional pedestrian crossing across the Baggot Street Upper western approach to the Waterloo Road junction facilitating easier movement of people within the village;
- Enhanced public realm consisting of high quality natural stone paving, new street trees and public seating;
- Enhanced cycle facilities facilitating safer access to the Baggot Street Upper area by bicycle;
- Provision of c. 60 bicycle parking spaces (c. 30 Sheffield cycle stands).

Chapter 10 of the EIAR considers the potential community and economic impacts on the human population associated with the Construction and Operational Phases of the Proposed Scheme. These potential impacts can affect the way in which people live, work, relate to one another, organise to meet their needs and generally operate as members of society. The population assessment considers both social impacts on communities (community assessment) as well as economic impacts on commercial businesses (economic assessment). The assessment also considers the ways in which the Proposed Scheme will improve walking, cycling and bus facilities and is anticipated to encourage sustainable modes of transport, therefore reducing the demand for private vehicles / parking along the Proposed Scheme.

Section 10.4.3.2.1 sets out the economic assessment and commercial amenity assessment. The assessment is summarised in Table 10.14 where the community amenity residual impact on Baggot Street (included in the study section titled 'Haddington Road' as per Figure 10.1 in Volume 3 of the EIAR), is identified as Positive, Not Significant and Long-Term. The community accessibility assessment identifies the impact on Baggot Street as being Positive, Moderate to Significant and Long-Term for pedestrians, Positive, Moderate to Very Significant and Long-Term for Cyclists and Bus Users and Positive, Moderate and Long-Term for private vehicles.

As a whole, the Proposed Scheme will deliver positive impacts in terms of accessibility to community facilities and commercial businesses for pedestrians, cyclists and bus users during the Operational Phase. The Proposed Scheme is also expected to benefit individuals and businesses whose workers live along the corridor. It is noted that Appendix A10.2 contains a report prepared by EY which outlines the economic impact of the Core Bus Corridors. In relation to impacts on local businesses, this report makes the following conclusions:

“Evidence from studies in Ireland and internationally suggest that reductions in the numbers of car journeys to the shops should not lead to a reduction in footfall as traders typically overestimate the importance of cars. Many shoppers are already arriving using sustainable transport options and

therefore should be quick to take advantage of new transport options. There may be some disruption to business during the construction phase, however once the new routes are open footfall should return to normal and may in fact rise (see next three pages).

There is strong international evidence to suggest that the proposed improvements will lead to further increases in the use of sustainable transport. This should, in turn, more than compensate for reductions in visits by car users. Whilst spend per visitor may fall slightly, the overall spend rises due to the increased overall footfall. This effect should occur as soon as the new proposed routes open with shoppers choosing to make even more use of sustainable transport decisions. Whilst there is limited evidence of the impact during the construction work, none of the evidence suggested an increase in business insolvency or a departure of businesses from the area during construction works.

The construction of the new infrastructure, including cycle lanes, will result in the loss of commercial parking along the routes, however all of the evidence suggests that this will not lead to a loss of business. In fact the reverse has been shown to occur in other countries, with more cyclists visiting a range of shops more often and spending more when suitable bike parking is made available. This does not appear to be only linked to major city centres, with many studies looking at a wide range of communities along transport routes. Increased safety due to reduced car traffic and protected cycle routes, alongside increased parking spaces for bicycles, should encourage a rapid shift to walking and cycling for all age groups.

By creating easy access to local village centres and reducing the level of car traffic in these areas, more people will be attracted to the area and also spend a longer amount of time in each visit. As a consequence, this is likely to have a positive impact on all local businesses along the routes, regardless of size or location. It will also create a nicer atmosphere and a greater sense of community. This impact will be rapidly felt and communities should begin to benefit as soon as the new infrastructure works have been completed.”

As such, it is anticipated that the Proposed Scheme will have a positive impact on local businesses in the Pembroke Road area, rather than a negative impact.

2.2.3.6 Pedestrian and Cyclist Facilities

Summary of issue

A number of submissions reference the lack of a proposed pedestrian crossing on Pembroke Road. A number of other submissions note that parking protected cycle tracks are dangerous and create conflicts between people accessing/egressing cars and for cyclists. Other submissions note that the proposed increase in bus traffic will create a dangerous environment for pedestrians. It is further noted in a number of submissions that there are likely to be issues with events at the Aviva stadium where 60,000 people will access the stadium by foot, and query why this was not specifically addressed. Several submissions state that priority should not be given to cyclists as they are a menace to pedestrians and only represent a minority of road users.

Response to issue

The aim of the Proposed Scheme is to provide enhanced walking, cycling and bus infrastructure on this key access corridor in the Dublin region, which will enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor. The proposed scale of the BusConnects CBC Infrastructure Works will be transformational for walking and cycling in Dublin, delivering a large number of the primary cycling routes identified in the Greater Dublin Area Cycle Network plan. With proposals of this scale, it is critical that the overall design approach matches the stated ambition, and can achieve a longevity that such investment deserves. With this in mind, the NTA set about developing ‘Design Principles’ for the project. These principles would complement existing documents and standards such as the National Cycle Manual and the Design Manual for Urban Roads and Streets (DMURS). A Preliminary Design Guidance Booklet (Refer to Appendix O to the Preliminary Design Report in Supplementary Information) was developed to outline the agreed design principles and to enable consistency of design.

Appendix O Preliminary Design Guidance Booklet (PDGB) of the Preliminary Design Report in the Supplementary Information draws on international best practice from countries at the forefront of active travel infrastructure design and delivery such as the Netherlands, Denmark and the UK and

has been peer reviewed by international experts from each of these countries. The Proposed Scheme has been designed in accordance with the PDGB and other best practice guidance documents to ensure that all designs are safe and comfortable for pedestrians and cyclists, in line with the road user hierarchy set out in DMURS.

An independent, Stage 1 Road Safety Audit was carried out on the Proposed Scheme by PMCE and is included in Appendix M to the Preliminary Design Report. This audit did not envisage any safety issues with respect to the pedestrian and cyclist facilities proposed on Pembroke Road.

Chapter 6, Traffic and Transport, of the EIAR outlines the methodology followed in assessing the impact of the Proposed Scheme with respect to the baseline environment. Section 6.4.6.1.1.1 notes the following with respect to pedestrian infrastructure:

“The impacts to the quality of the Pedestrian Infrastructure as a result of the Proposed Scheme have been considered with reference to any changes to the existing pedestrian facilities along footpaths and crossing locations within the direct study area. Reference has been made to the overall changes along the full length of the Proposed Scheme and the impact assessment primarily focuses only on the pedestrian facilities at junctions to provide a direct comparison between the Do Minimum and Do Something scenarios. Where the Proposed Scheme introduces a change to a junction layout, the impact on pedestrians has been assessed using a set of criteria which has been derived from guidance listed in Section 6.9. The contents of Table 6.18 outline the assessment criteria for each junction.”

Table 6.18: Pedestrian Junction Assessment Criteria

Aspect	Indicator
Routing	Are pedestrian crossings (signalised or uncontrolled) available on all arms?
Directness	Where crossings are available, do they offer direct movements which do not require diversions or staggered crossings i.e., no or little delay required for pedestrians to cross in one direct movement?
Vehicular speeds	Are there measures in place to promote low vehicular speeds, such as minimally sized corner radii and narrow carriageway lane widths?
Accessibility	Where crossings exist, are there adequate tactile paving, dropped kerbs (or raised table treatment) and road markings for pedestrians (including able-bodied, wheelchair users, mobility impaired and pushchairs)?
Widths	Are there adequate footpath and crossing widths in accordance with national standards?

The level of service (LoS) rating demonstrated in Table 6.19 has been applied to each junction for both the Do Minimum and Do Something scenarios based on whether the above indicators have been met.”

Table 6.19: Pedestrian Junction Assessment LoS

LoS	Indicators Met (of a Total of 5)
A	5
B	4
C	3
D	2
E	1
F	0

Section 6.4.6.1.1.2 notes the following with respect to cycling infrastructure:

“The impacts to the quality of the cycling infrastructure as a result of the Proposed Scheme have been considered with reference to the changes in physical provision for cyclists provided during the Do Minimum and Do Something scenarios. The NTA’s National Cycle Manual’s Quality of Service (QoS) Evaluation criteria have been adapted for use in assessing the cycling qualitative impact along the Proposed Scheme. The refined cycling facilities criteria are as follows:

- *Segregation: a measure of the separation between vehicular traffic and cycling facilities;*

- *Number of adjacent cyclists / width: the capacity for cycling two abreast and / or overtaking ('2+1' accommodates two abreast plus one overtaking); and*
- *Junction Treatment: a measure of the treatment of cyclist traffic at existing junctions.*

The contents of Table 6.21 outline the assessment criteria with reference to the corresponding LoS ratings.

Table 6.21: Cycling Assessment Criteria

LoS	Segregation	No. of adjacent cyclists/width		Junction treatment
A+	High degree of separation. Minimal delay	2+1	2.5m	Cyclists get green signal priority at signalised junctions / has priority across uncontrolled junctions
A	Well separated at mid-link with some conflict at intersections	1+1	2.0m	Toucan crossings at signalised junctions for cyclists along CBC / Protected junctions not already classified as A+ for junction treatment
B	On-road cycle lanes or carriageway designated as 'quiet cycle routes'	1+1	1.75m	Cyclists share green time with general traffic and cycle lanes continue through the junction, for junctions not already classified as A or A+ for junction treatment
C	Bicycle share traffic or bus lanes	1+0	1.25m	Cyclists share green time with general traffic with cycle facilities (advanced stacking locations / cycle lanes) available up to the junction but don't continue through
D	No specific bicycle facilities	1+0	0.75m	No specific bicycle facilities

As the cycle provision varies along the corridor, each section of the Proposed Scheme has been further separated into smaller subsections in order to apply the cycling assessment criteria appropriately.

When comparing the Do Minimum and Do Something scenarios for cyclists, the terms outlined in Table 6.22 have been used to describe the impact, based on the changes in the Qualitative Cycling LoS rating.

Table 6.22: Description of Impact for Cycling Qualitative Assessment

Magnitude of Impact	Change in LoS Rating
High	3 to 4
Medium	2
Low	1
Negligible	0

EIAR Volume 2 Chapter 6, Traffic and Transport documents the baseline conditions with respect to walking and cycling on Pembroke Road and assesses the Proposed Scheme against this baseline. In relation to pedestrian facilities the results of this assessment demonstrate that the Level of Service (LoS) for pedestrians in the Do Minimum (existing infrastructure) scenario is typically of C/D rating. In the Do something (Proposed Scheme) scenario this LoS typically increases to a A/B rating. This is categorised as a Positive, Slight to Significant and Long-term impact in terms of the level of service of pedestrian facilities on Pembroke Road.

In relation to cycling facilities the results of this assessment demonstrate that the LoS for cyclists in the Do Minimum (existing infrastructure) scenario is of D rating throughout. In the Do something (Proposed Scheme) scenario this LoS increases to an A rating throughout. This is categorised as a Positive, Very Significant and Long-term impact in terms of the level of service of cycling facilities on Pembroke Road.

In relation to the provision of a new pedestrian crossing on Pembroke Road, a number of informal crossing points of Pembroke are available in the existing scenario. The Proposed Scheme will retain these informal crossing points. Furthermore, it is noted that it is proposed to narrow the existing

carriageway as part of the Proposed Scheme, as well as reducing the level of through traffic significantly through the introduction of a Bus Gate at the western end of Pembroke Road, and at the location of the crossings, buildouts are provided to reduce crossing distances and improve visibility thereby facilitating safer and easier crossings movements for pedestrians.

In relation to the concerns in relation to events at the Aviva Stadium it is noted that the Proposed Scheme provides the preferred cross-section for the day to day functioning of this section of the Proposed Scheme which does not include events at the Aviva Stadium. Traffic and crowd management for events within the Aviva Stadium, or any other such adjacent location, will be a matter for the event organisers, in liaison with An Garda Síochána. It is noted that existing footpath widths on Pembroke Road are maintained and widened where feasible, and as such it is not envisaged that additional issues would be experienced with respect to pedestrian volumes during large events.

With respect to the comments relating to parking protected cycle tracks, this design is in line with the PDGB which states:

“Where parking is provided along the CBC, the preferred location for raised adjacent cycle tracks is between the pedestrian footpath and any proposed parking spaces to provide additional protection for cyclists.”

The provision of parking protected cycle tracks is also in line with international best practice for high-quality cycling infrastructure. The UK Department for Transport document Cycle Infrastructure Design (LTN 1/20) notes the following in this regard on page 59:

“Providing a cycle track between parked vehicles and the footway provides a much higher level of service in terms of safety and comfort than having a cycle lane on the offside of parking/loading areas; and requires no additional width.”

In relation to the submissions which note that cyclists should not be given priority as part of the Proposed scheme, the prioritisation of active and sustainable modes is enshrined in national policy. Section 2.3 of Chapter 2 of the EIAR, Need for the Proposed Scheme, sets out the policy context for the Proposed Scheme. The following national policies are relevant to cycling and outline the hierarchy of road users, the top of which active travel sits at:

“This [National Development Plan] NDP represents a step-change in the approach towards funding active travel in Ireland. Over the next 10 years approximately €360 million per annum will be invested in walking and cycling infrastructure in cities, town and villages across the country, including Greenways.’ It continues ‘The investment proposed for the major urban centres over the next 5 years will target over 700km of improved walking and cycling infrastructure delivered across the five cities.”

“The National Cycle Policy Framework 2009-2020 (hereafter referred to as the NCPF) (DTTAS 2009b) is Ireland’s cycling policy framework. The vision is to create a strong cycling culture in Ireland, stating that ‘Cycling will be a normal way to get about, especially for short trips’. The NCPF outlines 19 specific objectives, so that by the year 2020, 10% of all journeys made were intended to be by bike. This policy framework outlines a number of interventions to make cycling easier and safer.”

“The Road Safety Strategy 2021 – 2030 (RSA 2021) is ‘Vision Zero’ which is to achieve the long term goal of eliminating deaths and serious injuries in road traffic collisions by 2050. The strategy ‘involves the promotion of the safer modes (e.g., public transport, such as bus and rail travel), and the promotion and provision of safe road environments for otherwise healthy, active modes. This includes walking and cycling, where the risks of death and serious injury in the event of a collision are higher than for protected in-vehicle road users.’ The Strategy acknowledges that ‘The promotion and increased uptake of public transport can greatly contribute to fatality and serious injury reductions over the course of the 2021-2023 strategy’. It continues ‘The substantial societal benefits of increased active travel (i.e. walking or cycling) must also be acknowledged in light of Ireland’s climate objectives, including reduced emissions, traffic congestion and noise pollution, and increased physical activity and its related health benefits.”

“In regard to modal shift the Climate Action Plan 2021 sets out that: ‘The proposed pathway in transport is focused on accelerating the electrification of road transport, the use of biofuels, and a modal shift to transport modes with lower energy consumption (e.g. public and active transport)’.”

“The Department of Transport (DoT) has finalised the transport framework, the National Investment Framework for Transport in Ireland (hereafter referred to as NIFTI) (DoT 2021) to ensure alignment with the policies of the NPF. NIFTI sets out the DoT’s strategy for the development and management of Ireland’s land transport network (roads, public transport, walking and cycling) over the next two decades. The NPF and its projections around population and settlement patterns are central to the development of NIFTI. The purpose of NIFTI is to enable the delivery of Project Ireland 2040 and the ten National Strategic Objectives (NSOs) by guiding the appropriate investment in Ireland’s roads, active travel and public transport infrastructure.”

“NIFTI Modal Hierarchy is:

- 1. Active Travel;*
- 2. Public Transport; and*
- 3. Private Vehicles”*

Various regional and local policy documents including the Transport Strategy for the Greater Dublin Area, the Greater Dublin Area Cycle Network Plan and the relevant Development plans also support the promotion of cycling as an important, sustainable transport mode.

2.2.3.7 Consideration of Alternatives (The Newton Plan)

Summary of issue

A number of submissions refer to the Newton Plan as an alternative to the Proposed Scheme and request that this plan be examined by the NTA as a potential alternative to the Proposed Scheme.

Response to issue

The NTA acknowledge that the Newton Plan has been referenced in a number of submissions and in some cases a report prepared by Tom Phillips Associates has been appended to the submission. It is noted that this report was submitted on behalf of the Baggot Street Traders and the Pembroke Road Association as part of the consultation process on the Draft Greater Dublin Area Transport Strategy (2022-2042).

The Proposed Scheme is a sustainable transport infrastructure project and is being carried out under the auspices of the Transport Strategy for the Greater Dublin Area 2016-2023. The Newton Plan relates predominantly to planning for transport services rather than the infrastructure that these services would use. Future service patterns are being introduced under the Network Redesign element of BusConnects during the development of which there was considerable engagement around the contents of the Newton Plan. In addition, the Newton Plan has been considered as part of the development of the Draft Transport Strategy for the Greater Dublin Area 2022-2042. In relation to the Proposed Scheme, specifically it is noted that the Newton Plan refers to the use of Pembroke Road and Baggot Street. The reasons for this are set out in the response to the ‘Routing of the Proposed Scheme on Pembroke Road’ above.

2.3 Proposed Scheme on Baggot Street Upper

2.3.1 Description of Proposed Scheme at this Location

As set out in Section 4.5.4.1.3 of Chapter 4 of the EIAR, Proposed Scheme Description, the Proposed Scheme includes for the proposed installation of a bus gate at the western end of Pembroke Road with a short section of bus lane between the Eastmoreland Place and Waterloo Road junctions. This bus gate, along with the provision of sections of inbound and outbound bus lanes on Baggot Street Upper will ensure bus priority through this section of the Proposed Scheme. The Proposed Scheme

also includes for the provision of dedicated cycle tracks through the Baggot Street Upper retail area while also significantly enhancing the urban realm in this vibrant urban village.

Eastbound general traffic on Baggot Street Upper will not be permitted to access Pembroke Road and vice versa for westbound traffic on Pembroke Road during the hours of operation of the proposed bus gate (6am to 8pm, Monday to Sunday). Consequently, the existing right-turn lane from Baggot Street Upper to Waterloo Road will be retained and the existing straight-ahead general traffic lane towards Pembroke Road will be converted to a bus lane. Some loading and parking will be retained in the Baggot Street Upper retail area with additional / compensatory parking and loading provided where practicable.

At Baggot Street Upper on the inbound approach to the Mespil Road junction, it is proposed to reduce the number of lanes at the junction from four to two. Due to the proposed constrained width on MacCartney Bridge, signal controlled priority will be provided approaching the Mespil Road junction, where inbound (northbound) buses will be allowed to cross the bridge ahead of general traffic.

Proposed improvements to the urban realm within the Baggot Street Upper area include the planting of new street trees and low-level planting, the provision of public seating, the installation of high-quality stone paving, the retention of historic granite kerbing, paving and other features such as coal holes and heritage lighting columns and the provision of 31 no. new cycle parking stands capable of accommodating 62 bicycles.

At the McCartney Bridge (also known as MacCartney Bridge, Baggot Street Bridge), where Baggot Street Lower meets Baggot Street Upper, it is proposed to widen the existing footpaths on both sides of the bridge and introduce cycle tracks on both sides of the carriageway on the bridge. Due to the constrained width of this bridge, it is also proposed to reduce the number of lanes to one general traffic lane in each direction crossing the bridge which will allow for these improvements to walking and cycling infrastructure crossing the canal. Upgrades at the junction of Wilton Terrace / Herbert Place / Baggot Street Lower will integrate the Proposed Scheme with the Grand Canal cycleway.

Extracts from drawing set **2. General Arrangement** and drawing set **5. Landscape General Arrangement**, which are provided as an appendix to Chapter 4 in Volume 3 of the EIAR, are included below in Figure 2.31 and Figure 2.32. A number of photomontages have been prepared which document the visual impact of the scheme post implementation and show the improvements to the public realm within the area. These photomontages are included in Figure 17.2 of Volume 3 of the EIAR, and are reproduced below in Figure 2.33, Figure 2.34, Figure 2.35 and Figure 2.36.

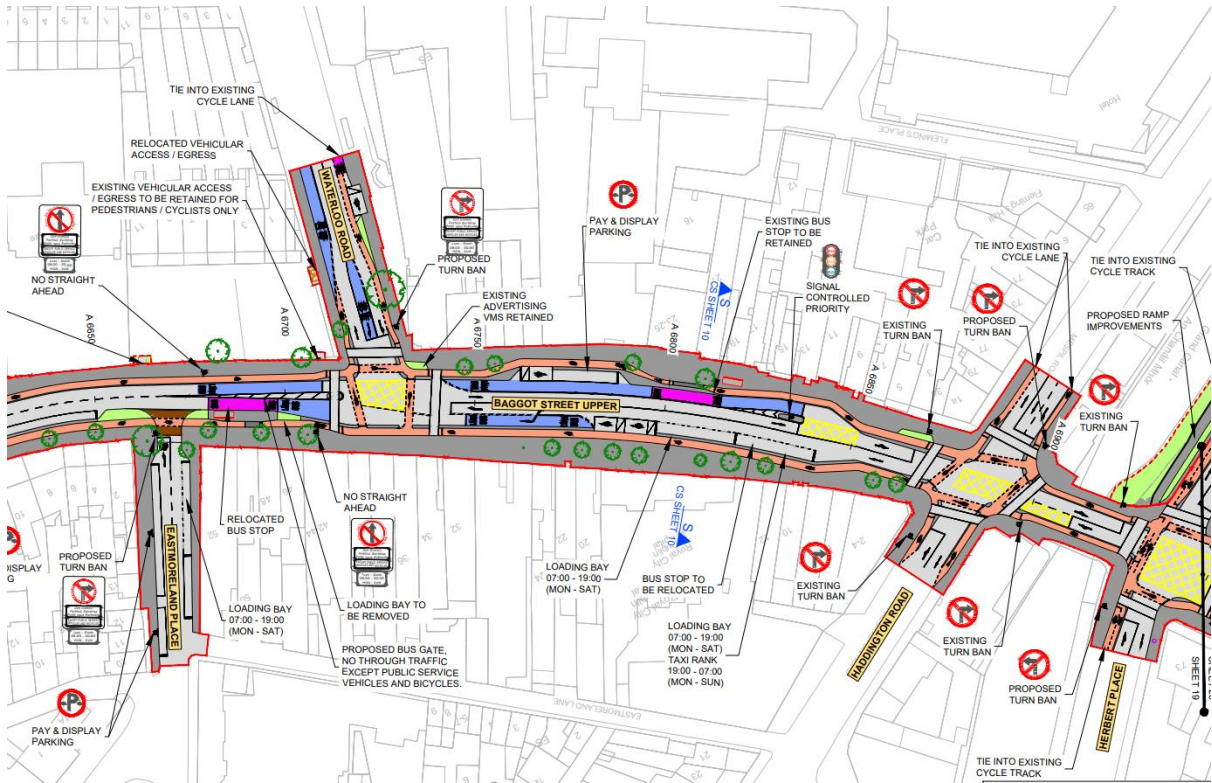


Figure 2.31: Extract from General Arrangement Drawing

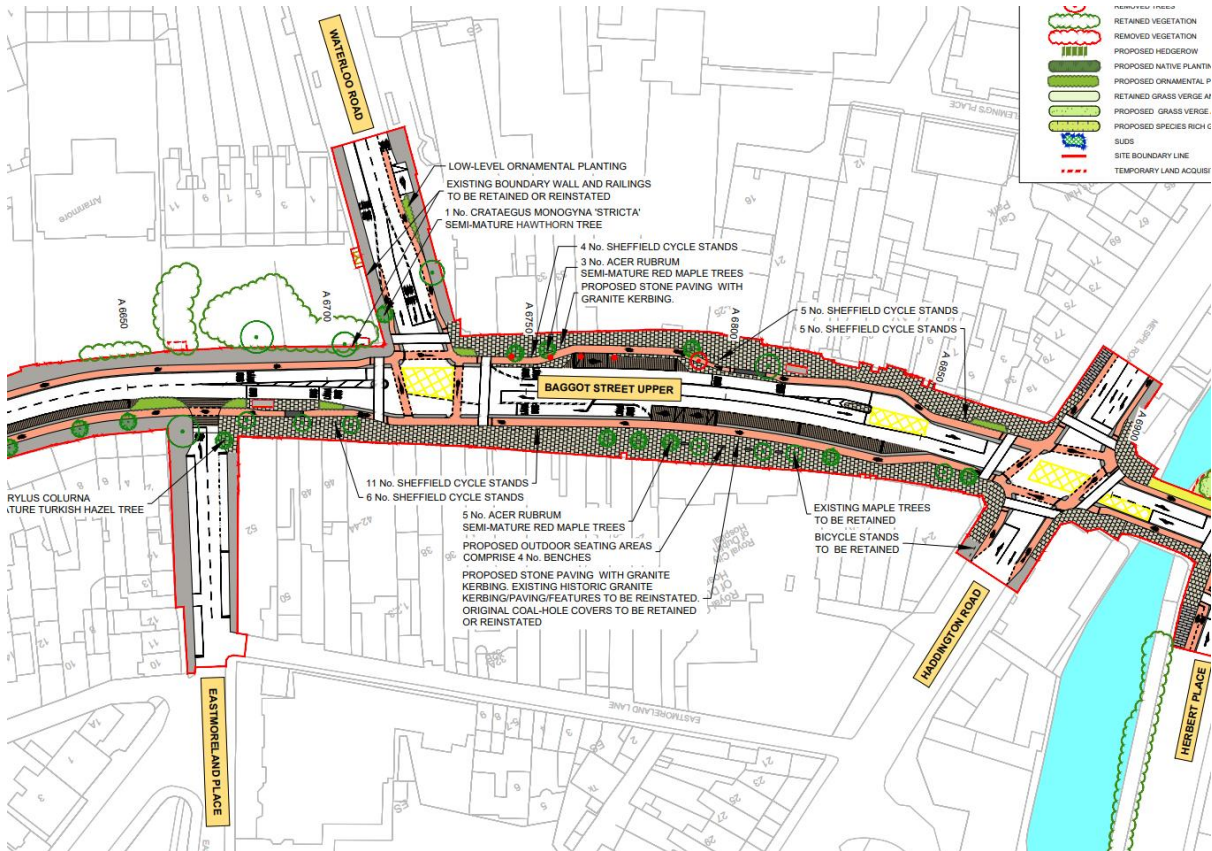


Figure 2.32: Extract from Landscape General Arrangement Drawing



Figure 2.33: Baggot Street Upper - View 1, Existing Situation



Figure 2.34: Baggot Street Upper – View 1, Post-Implementation of the Proposed Scheme



Figure 2.35: Baggot Street Upper - View 2, Existing Situation



Figure 2.36: View 2, Post-Implementation of the Proposed Scheme

2.3.2 Overview of Submissions Received

Table 2.3 below lists the 28 individual submissions made in relation to the Proposed Scheme at this location.

Table 2.3: Submissions Made in Respect of Baggot Street Upper

No	Name	No	Name	No	Name
5	Michael P Bowles	45	Eamon Hoey	73	Mark O'Byrne
6	Patrick Bowles	49	John Kelly	75	Pierce O'Leary
15	Anthony Comaskey	51	Georgina Kirwan	78	James O'Shea
16	Patricia Conroy	52	Langkawi Malaysian Restaurant	80	Dr Rozelle Owens
22	James Deane	54	Ross Little	82	James Quinn
25	Mark Dinneen / Mary Dinneen	58	Muiris McAuley	89	Sarah Staunton
40	Aidan Harte	62	Damien McGrath	92	Tesco Ireland Limited
41	Bronagh Harte	67	Mary Morris	95	Upper Baggot Traders Association
43	Brigid Hoey	68	Mary Morris		
44	Daniel J Hoey	69	Paddy Mulligan		

2.3.3 Common Issues Raised

2.3.3.1 Routing of the Proposed Scheme on Pembroke Road and Baggot Street Upper

Summary of issue

A number of submissions voiced concern at the proposed routing of the Proposed Scheme along Pembroke Road and Baggot Street, and noted that a more suitable route would be via Northumberland Road and Mount Street. A number of submission highlighted that McCartney Bridge was older than Mount Street Bridge and voiced concerns that it was unsuitable for large volumes of buses, due to its 'humpback' nature. Some submissions asserted that a route via Northumberland Road was more direct than the route of the Proposed Scheme.

Response to issue

Section 3.3.3.2.2 of the Preferred Route Option Report included in the Supplementary Information outlines the rationale for the routing of the Proposed Scheme via Pembroke Road and Baggot Street Upper as follows:

"The Proposed Scheme is routed via Baggot Street Upper and Pembroke Road for reasons including the following:

- *To improve the integration with new and existing sustainable transport facilities on the street itself and through Baggot Village;*

- *To provide cycle facilities on the Secondary Route of the GDA Cycle Network Plan; and*
- *To increase the catchment of the Proposed Scheme in terms of Combined Activity Density”*

Chapter 2 of the EIAR, Need for the Scheme, sets the context for the transport need for the Proposed Scheme. It is noted in section 2.2.1.6 of this chapter that:

“The Dublin Area Bus Network Redesign Revised Proposal (October 2019) (NTA 2019) presented information on ‘patterns of demand’. Image 2.5 is an extract of the Combined Activity Density map for areas local to the Proposed Scheme, which combines residential, employment, and student enrolment densities to approximate the total effect of all densities in representing potential demand for public transport.”

Figure 2.37 and Figure 2.38 are extracted from Chapter 2 of the EIAR and present the combined activity density along the route of the Proposed Scheme. It is noted that the combined activity density map referenced in Chapter 2 is extracted from the BusConnects Dublin Area Bus Network Redesign Revised Proposal Report. It is evident from these figures that there is a greater combined activity density along the route of the Proposed Scheme, i.e. along Pembroke Road and Baggot Street Upper, when compared with the alternative route raised in these submissions, i.e. along Northumberland Road and Mount Street.

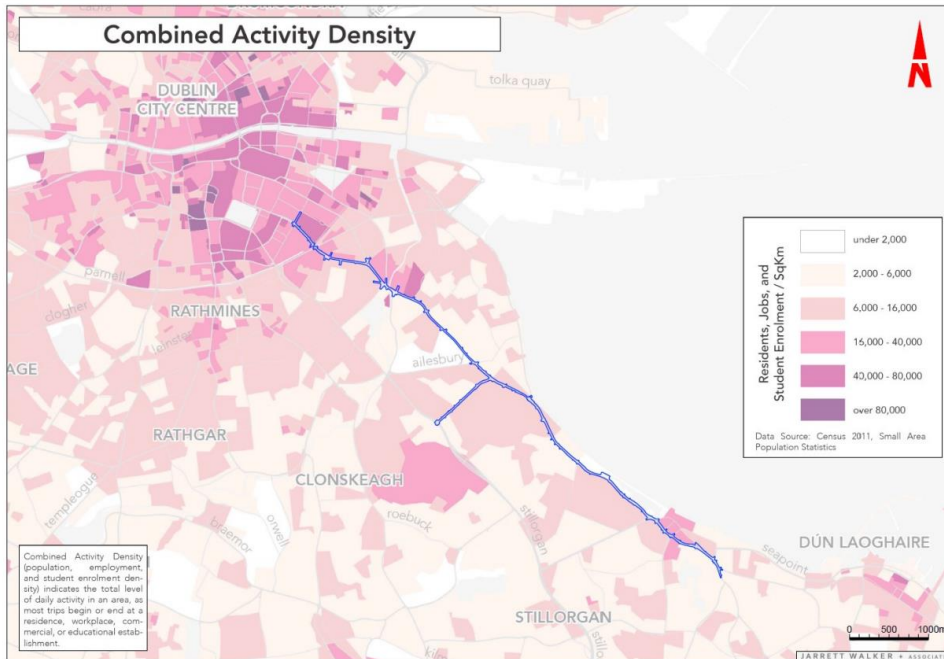


Image 2.5: Combined Activity Density Map (Dublin Area Bus Network Redesign Revised Proposal (NTA 2019). Proposed Scheme Highlighted in Blue for Information.

Figure 2.37: Combined Activity Density Map



Figure 2.38: Annotated Extract from Combined Activity Density map in the Baggot Street Upper Area

Chapter 3 of the EIAR, Consideration of Reasonable Alternatives, outlines the Options Assessment process in determining the Preferred Route Option. During the initial assessment stage, the Proposed Scheme consisted of two separate Core Bus Corridors (CBCs), namely the Dún Laoghaire to City

Centre CBC and the Ballsbridge to UCD CBC. These CBCs were subsequently combined to form the Proposed Scheme. In determining the Emerging Preferred Route (EPR), the Dún Laoghaire to City Centre CBC scheme was divided into three sub-sections (Study Area Section - SAS) for further assessment and refinement (see Figure 2.39). As noted, the third section, SAS3 was included in the original assessment but subsequently removed from the Proposed Scheme.

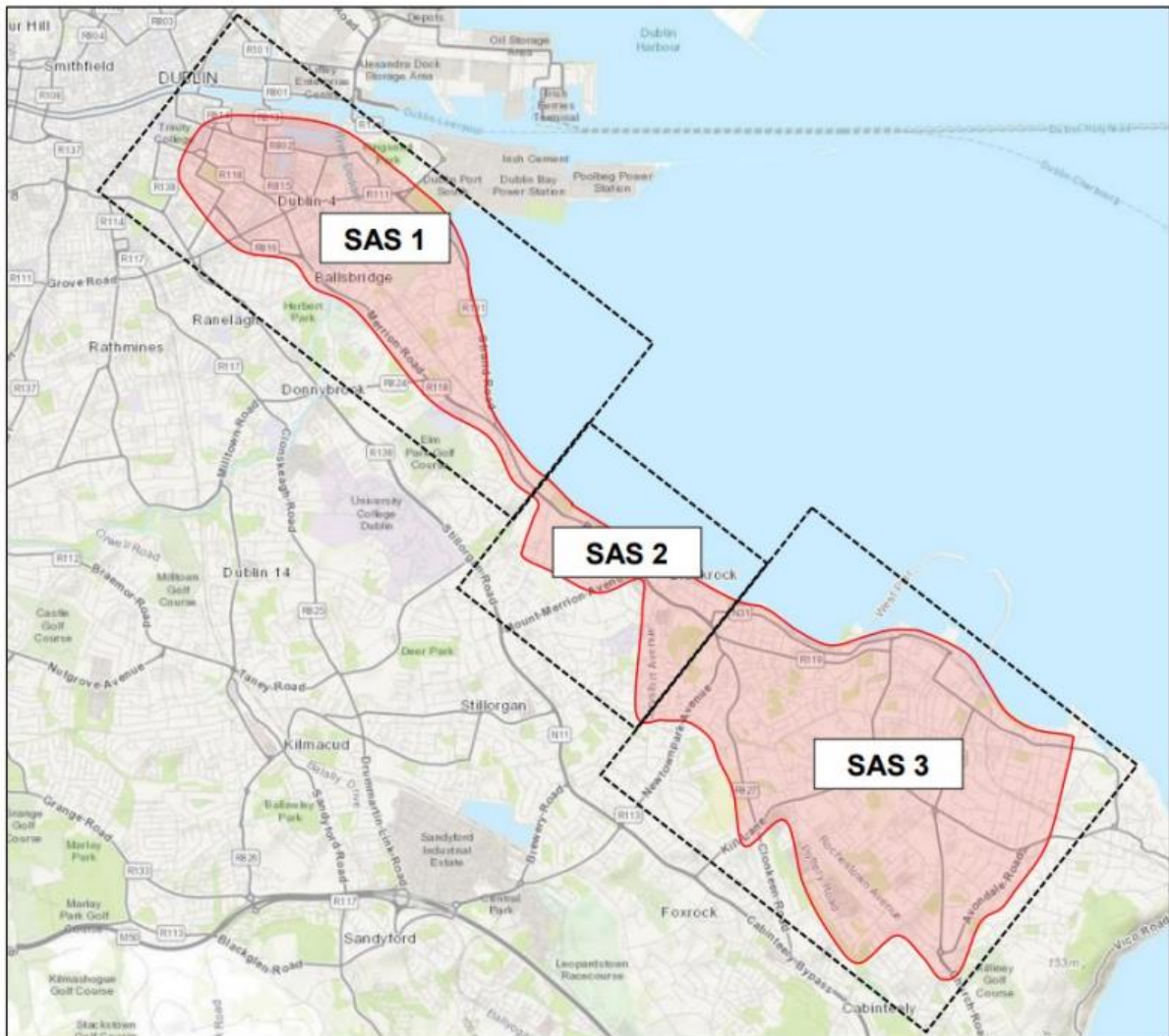


Figure 2.39: Stage 2 Route options sub-section division extracted from ‘Dún Laoghaire to City Centre Core Bus Corridor Options Study – Feasibility and Options Assessment’

In relation to sub-section SAS1, following the Stage 1 sifting process, two viable route options for sub-section SAS1, were taken forward for assessment and further refinement:

- Route Option N1: A route option via Merrion Road, Pembroke Road and Baggot Street Lower; and
- Route Option N2: A route option via Merrion Road, Northumberland Road and Merrion Square North.

These routes are presented in Figure 2.40.

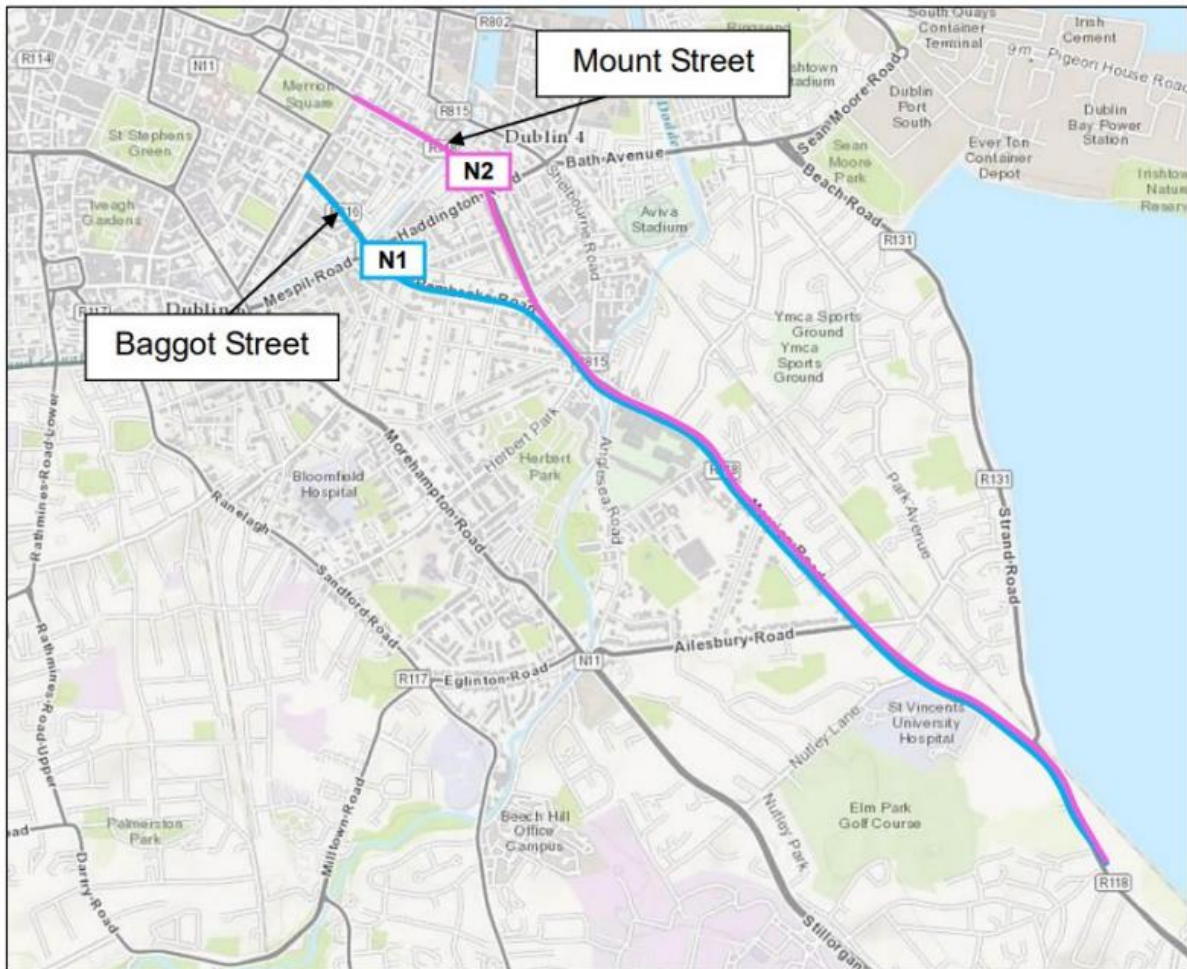


Figure 2.40: Sub-section SAS1 Route Options extracted from ‘Dún Laoghaire to City Centre Core Bus Corridor Options Study – Feasibility and Options Assessment’

Two scheme options were considered along each route which would provide traffic lanes, bus lanes and cycle tracks in each direction. The primary difference between these scheme options was the treatment at the junctions (Option 2 of each route required buses to share with left-turning traffic at junctions). The four options considered within this section were:

- **Route N1 Option 1:** A route via Merrion Road, Pembroke Road and Baggot Street Lower, with bus priority provided to the stop line at junctions;
- **Route N1 Option 2:** A route via Merrion Road, Pembroke Road and Baggot Street Lower, where buses share with left-turning traffic at junctions;
- **Route N2 Option 1:** A route via Merrion Road, Northumberland Road and Merrion Square North, with bus priority provided to the stop line at junctions; and
- **Route N2 Option 2:** A route via Merrion Road, Northumberland Road and Merrion Square North, where buses share with left-turning traffic at junctions.

The assessment sub-criteria which were differentiators between scheme options included Capital Cost, Transport Reliability and Quality, Residential Population and Employment Catchments, Traffic Network Integration and Land Use Character.

Route N1 Option 2 was identified as having significant benefits over other options in relation to both Capital Cost and Land Use Character. Following a detailed MCA, route N1 Option 2 was identified as the preferred option for this section and was brought forward into the Emerging Preferred Route.

In terms of capital cost, Route, N1 Option 2 was identified as the lowest costing due to the reduced level of land acquisition required.

When the options were considered under the Land Use Character sub-criteria, Route N1 Option 1 and Route N1 Option 2 (via Pembroke Road and Baggot Street Upper), were considered to have some advantages when compared to Route N2 Option 1 and Route N2 Option 2 (via Northumberland Road) with Route N1 Option 2 presenting further advantages over Route N1 Option 1. In all four options, a large number of trees and on-street parking provision was expected to be affected, however, to a greater extent on the Route N2 Options via Northumberland Road. Route N1 Option 2 was therefore considered to have advantages under this criterion given the lower impact on existing land use character.

Route Option 2 was identified as the Emerging Preferred Route for this section of the Proposed Scheme. Route Option 2 was therefore brought forward into the overall Emerging Preferred Route. This option was subsequently confirmed as the Preferred Route Option for this section of the Proposed Scheme.

Figure 2.41 below is an extract from Table 6.4 of Appendix H1 Dún Laoghaire to City Centre Core Bus Corridor Options Study Feasibility and Options Assessment Report in the Supplementary Information, and summarises the multi-criteria analysis undertaken to assess option 1 and 2 for route N1 and option 1 and 2 for route N2.

Table 6.4: SAS 1 Route Options Assessment Summary (Main Criteria)

MCA criteria	Assessment Sub-Criteria	N1 Option 1	N1 Option 2	N2 Option 1	N2 Option 2
Economy	1.a. Capital Cost				
	1.b. Transport Reliability and Quality (Journey Time)				
	2.b. Residential Population and Employment Catchments				
	2.e. Traffic Network Integration				
	6.i. Land Use Character				

Figure 2.41: SAS 1 Route Options Assessment Summary (Main Criteria)

In relation to the McCartney Bridge, the Proposed Scheme prioritises walking, cycling and buses crossing this bridge. As such, the Proposed Scheme design in this location successfully meets the objectives of the Proposed Scheme. It is further noted that Table 6.65 in Chapter 6, Traffic and Transport, of the EIAR, lists road links which experience a reduction in general traffic flows in 2028 following the implementation of the Proposed Scheme. As shown in Figure 2.42 below, Baggot Street Upper experiences a reduction of 952 PCUs in the peak hour, while Baggot Street Lower experiences a reduction of 317 PCUs. As such, significantly fewer vehicles will be crossing the bridge following the implementation of the Proposed Scheme than currently do.

Table 6.65: Road Links that Experience a Reduction of ≥ 100 Combined Flows during 2028 AM Peak Hour (Direct Study Area)

Location	Map I.D.	Road Name	Do Minimum Flows (PCUs)	Do Something Flows (PCUs)	Flow Difference (PCUs)
Section 1 – R827 Stradbroke Road to L1003 Booterstown Avenue	S.1	Temple Hill	1,643	608	-1,035
		Temple Road	867	380	-488
		Frascati Road	1,754	680	-1,074
		Rock Road South of Booterstown	1,819	938	-881
Section 2 – L1003 Booterstown Avenue to Nutley Lane	S.2	Rock Road North of Booterstown	2,160	1,178	-981
Section 3 – R118 Merrion Road to Ballsbridge	S.3	Merrion Road South of Nutley Lane	1,431	781	-651
		Merrion Road North of Nutley Lane	2,420	1,545	-875
Section 4 – Ballsbridge to Merrion Square	S.4	Pembroke Road	1,085	101	-984
		Baggot Street Upper	1,274	322	-952
		Baggot Street Lower	430	113	-317
		Fitzwilliam Street Upper	665	316	-349
Section 5 – R138 Stillorgan Road to R118 Merrion Road – Nutley Lane	S.5	Nutley Lane	1,112	892	-220

Figure 2.42: Extract from Chapter 6 of the EIAR outlining road links which experience traffic reduction during the 2028 AM Peak Hour

In relation to structural loading on the bridge, it is further noted that due to the reduction in cross-sectional width of the trafficked area on the bridge, that the number of vehicles crossing the bridge at any given time will be significantly reduced following the implementation of the Proposed Scheme (the trafficked area will be approximately halved from approximately 12m to approximately 6m).

2.3.3.2 Impacts on the businesses in the area

Summary of issue

A number of submissions raised concerns about the potential impacts of the Proposed Scheme on businesses in the area. Some of these submissions cited removal of parking and loading and the proposed bus gate in their submission and these issues are dealt with separately below. Other submissions referred more generally to the negative impact of the Proposed Scheme on their businesses.

Response to issue

The Proposed Scheme on Baggot Street Upper proposes a significant number of improvements that will not only improve the movement of people through the area by sustainable modes, but improve the general amenity of the area by enhancing its sense of place and strengthening its position as a destination in its own right. These include:

- Significant widening of footpaths on the northern side of the street with some localised widening on the southern side;
- An additional pedestrian crossing across the Baggot Street Upper western approach to the Waterloo Road junction facilitating easier movement of people within the village;
- Enhanced public realm consisting of high quality natural stone paving, new street trees and public seating;
- Enhanced cycle facilities facilitating safer access to the Baggot Street Upper area by bicycle;
- Provision of c. 60 bicycle parking spaces (c. 30 Sheffield cycle stands).

Chapter 10 of the EIAR considers the potential community and economic impacts on the human population associated with the Construction and Operational Phases of the Proposed Scheme. These potential impacts can affect the way in which people live, work, relate to one another, organise to meet their needs and generally operate as members of society. The population assessment considers both social impacts on communities (community assessment) as well as economic impacts on commercial businesses (economic assessment). The assessment also considers the ways in which the Proposed Scheme will improve walking, cycling and bus facilities and is anticipated to encourage sustainable modes of transport, therefore reducing the demand for private vehicles / parking along the Proposed Scheme.

Section 10.4.3.2.1 sets out the economic assessment and commercial amenity assessment. The assessment is summarised in Table 10.14 where the community amenity residual impact on Baggot Street (included in the study section titled 'Haddington Road' as per Figure 10.1 in Volume 3 of the EIAR), is identified as Positive, Not Significant and Long-Term. The community accessibility assessment identifies the impact on Baggot Street as being Positive, Moderate to Significant and Long-Term for pedestrians, Positive, Moderate to Very Significant and Long-Term for Cyclists and Bus Users and Positive, Moderate and Long-Term for private vehicles.

As a whole, the Proposed Scheme will deliver positive impacts in terms of accessibility to community facilities and commercial businesses for pedestrians, cyclists and bus users during the Operational Phase. The Proposed Scheme is also expected to benefit individuals and businesses whose workers live along the corridor. It is noted that Appendix A10.2 contains a report prepared by EY which outlines the economic impact of the Core Bus Corridors. In relation to impacts on local businesses, this report makes the following conclusions:

“Evidence from studies in Ireland and internationally suggest that reductions in the numbers of car journeys to the shops should not lead to a reduction in footfall as traders typically overestimate the importance of cars. Many shoppers are already arriving using sustainable transport options and therefore should be quick to take advantage of new transport options. There may be some disruption to business during the construction phase, however once the new routes are open footfall should return to normal and may in fact rise (see next three pages).

There is strong international evidence to suggest that the proposed improvements will lead to further increases in the use of sustainable transport. This should, in turn, more than compensate for reductions in visits by car users. Whilst spend per visitor may fall slightly, the overall spend rises due to the increased overall footfall. This effect should occur as soon as the new proposed routes open with shoppers choosing to make even more use of sustainable transport decisions. Whilst there is limited evidence of the impact during the construction work, none of the evidence suggested an increase in business insolvency or a departure of businesses from the area during construction works.

The construction of the new infrastructure, including cycle lanes, will result in the loss of commercial parking along the routes, however all of the evidence suggests that this will not lead to a loss of business. In fact the reverse has been shown to occur in other countries, with more cyclists visiting a range of shops more often and spending more when suitable bike parking is made available. This does not appear to be only linked to major city centres, with many studies looking at a wide range of communities along transport routes. Increased safety due to reduced car traffic and protected cycle routes, alongside increased parking spaces for bicycles, should encourage a rapid shift to walking and cycling for all age groups.

By creating easy access to local village centres and reducing the level of car traffic in these areas, more people will be attracted to the area and also spend a longer amount of time in each visit. As a consequence, this is likely to have a positive impact on all local businesses along the routes, regardless of size or location. It will also create a nicer atmosphere and a greater sense of community. This impact will be rapidly felt and communities should begin to benefit as soon as the new infrastructure works have been completed.”

As such, it is anticipated that the Proposed Scheme will have a positive impact on local businesses in the Baggot Street Upper area, rather than a negative impact.

2.3.3.3 Loss of car parking and loading bays

Summary of issue

A large number of submissions raised concerns in relation to the proposed changes to parking and loading on Baggot Street Upper as a result of the Proposed Scheme. A number of submissions from business owners noted that their clients and staff travel by car and will not be able to park in close proximity to their business. Others raised concerns about the removal of loading bays, and referenced the relocation of loading bays to Eastmoreland Place as not sufficient.

Response to issue

In relation to the proposed removal of parking and loading bays on Baggot Street Upper, Section 6.4.6.1.5.4 of Chapter 6 of the EIAR, Traffic and Transport, sets out the impact on parking and loading within this section of the Proposed Scheme. The following is noted in this regard:

*“Removal of nine commercial pay & display and permit parking spaces, one disabled bay and one loading bay (three loading spaces) along the R816 Baggot Street Upper between Waterloo Road and the R111 Haddington Road to allow space for proposed new cycle tracks on both sides of the road to transition into off-road cycle tracks that bypass the on-street parking to be retained at this location. Both the R111 Haddington Road and Eastmoreland Place have an ample amount of equivalent parking spaces within close proximity to this location. It is estimated that there are approximately 194 alternative spaces within 200m. As a result, the impact of this loss of parking is considered to have a **Negative, Slight and Long-term effect.**”*

This section of the EIAR further goes on to state:

“Furthermore, the Proposed Scheme is considered to allow for significant improvement to the walking, cycling and bus facilities encouraging the use of sustainable modes of transport, that will ultimately reduce the demand for parking along with the availability of adjacent parking.”

In developing the design of the Proposed Scheme, the NTA has balanced the need to provide parking and loading within this important urban village with the objectives of the Proposed Scheme to provide high quality public transport, cycling and walking facilities through this area. As such, some parking and loading has been removed or relocated in close proximity to its current location. It is noted that approximately 194 parking spaces were identified within 200m of Baggot Street Upper which is considered to serve this area sufficiently.

The Parking Survey Report, which is included as Appendix G to the Preliminary Design Report in the Supplementary information, outlines the comprehensive analysis which was carried out to determine the impacts on parking and loading along the route of the Proposed Scheme. The change in on-street parking supply was identified and assessed in the context of the local needs and adjacent land uses. The local adjacent parking supply and characteristics were also noted.

It is envisaged that the implementation of the Proposed Scheme will serve to improve connectivity to the Baggot Street Upper area by sustainable modes of transport including walking, cycling and the bus. As such the demand for parking in this location is expected to reduce following the implementation of the Proposed Scheme. It is further noted that 27 Sheffield stands with space for 52 bicycles are proposed on Baggot Street Upper, as part of the Proposed Scheme. This is a substantial increase with respect to the existing provision and will facilitate those accessing the area by bicycle.

2.3.3.4 Consideration of Alternatives (The Newton Plan)

Summary of issue

A number of submissions refer to the Newton Plan as an alternative to the Proposed Scheme and request that this plan be examined by the NTA as a potential alternative to the Proposed Scheme.

Response to issue

The NTA acknowledge that the Newton Plan has been referenced in a number of submissions and in some cases a report prepared by Tom Phillips Associates has been appended to the submission. It is noted that this report was submitted on behalf of the Baggot Street Traders and the Pembroke Road Association as part of the consultation process on the Draft Greater Dublin Area Transport Strategy (2022-2042).

The Proposed Scheme is a sustainable transport infrastructure project and is being carried out under the auspices of the Transport Strategy for the Greater Dublin Area 2016-2023. The Newton Plan relates predominantly to planning for transport services rather than the infrastructure that these services would use. Future service patterns are being introduced under the Network Redesign element of BusConnects during the development of which there was considerable engagement around the contents of the Newton Plan. In addition, the Newton Plan has been considered as part of the development of the Draft Transport Strategy for the Greater Dublin Area 2022-2042. In relation to the Proposed Scheme, specifically it is noted that the Newton Plan refers to the use of Pembroke Road and Baggot Street. The reasons for this are set out in the response to the 'Routing of the Proposed Scheme on Pembroke Road' above.

2.3.3.5 *The proposed bus gate and associated traffic impacts*

Summary of issue

A number of submissions highlight the proposed bus gate on Pembroke Road and note that this will have a detrimental effect on the Baggot Street area, through the restriction of access by private vehicle to the Baggot Street area and associated businesses.

Response to issue

The NTA note the comments raised in relation to the proposed bus gate on Baggot Street Upper. The rationale for the provision of this bus gate is outlined in Section 3.4 of Chapter 3 of the EIAR, Consideration of Reasonable Alternatives. As outlined above in response to Common Issue 2.3.3.1 above, a route along Pembroke Road and Baggot Street Upper was identified as the Emerging Preferred Route for the Proposed Scheme.

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

- New and updated topographical survey information;
- Output from engagement and consultation activities on the Emerging Preferred Route and draft Preferred Route Option proposals;
- Further design development and options assessment; and
- Changes in the extent of the scheme.

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

One such area where alternative design options were developed and assessed was Pembroke Road and Baggot Street Upper. Section 3.4.1.1.2 of Chapter 3 of the EIAR summarises this options assessment process as follows:

“The EPR Option along Pembroke Road (between Baggot Street Upper to Northumberland Road) would impact on mature trees and antique railings. Consultation also identified safety concerns around narrowed footpaths as well as the importance of the local on-street parking for residents. Four options were assessed, as follows:

- **Option PR1:** *EPR Option with the road realigned to remove impact on existing access steps to properties on the northern side and reappportion all land acquisition to the southern side of the road (4 lane cross-section + cycle tracks + parking);*
- **Option PR2:** *Removal of land acquisition on the northern side as per PR1, however, with removal of all parking along the section, including removal of space between parking bays for tree planting (4 lane cross-section + cycle tracks);*
- **Option PR3:** *Removal of land acquisition on the northern side as per PR1, however, with only a one-way outbound traffic lane and with Bus Lanes and cycle tracks in each direction (3-lane cross-section + cycle tracks + parking); and*
- **Option PR4:** *Introduction of a single Bus Gate between Waterloo Road and Eastmoreland Place with two general traffic lanes from there to the Northumberland Road junction, with retention of all trees and no impact to property boundaries (2-lane cross-section + cycle tracks + parking).*

The preferred option was identified as Option PR4 – comprising the provision of two traffic lanes and a Bus Gate at the western end of Pembroke Road. Compared to the alternative options, this option will not require permanent land take from adjacent protected structures and other structures of significant heritage value through road widening nor on-street mature tree removal and will retain and, in some areas, widen footpaths, which has further benefit for large footfall in the area during major sporting and concert events.

In terms of the sub-criteria under the Environment criterion, the preferred option performed significantly better than the other options in relation to Flora & Fauna as it does not require the removal of any trees, whereas the others required the removal of a significant number of trees. In terms of Air Quality and Noise & Vibration, the preferred option again performed the best as it removes significant volumes of traffic from the road and reduces the carriageway width.

In terms of Architectural Heritage, Landscape & Visual and Land Use Character, the preferred option does not require tree removal nor permanent land acquisition and was ranked the highest under these categories. This option also retains the highest amount of parking. Each of the other options require land acquisition from properties that are on the record of protected structures and tree removal along the street. In these options existing parking volumes are also significantly reduced.

The preferred option performed equally to all other options in the remaining sub-criteria under Environment.

As such is it noted that the preferred option scored significantly higher under the environmental criteria compared to the other options, and overall it best met the Proposed Scheme objectives when compared to the other options. It is noted that other options were also considered in the area but were not carried forward to the MCA for the reasons briefly outlined below:

- Option of reversing the direction of the proposed one-way general traffic in Route Option PR3. This option was examined and sifted out as the outbound direction was considered to be the better option for a one-way road. This is primarily due to Pembroke Road’s proximity to the city centre, which would have a higher probability of becoming congested more often if there are a higher quantity of inbound general traffic streets in comparison to outbound general traffic streets. This could, in turn, impact on bus operations within the city centre core;
- Option of removing cycle tracks on Pembroke Road and providing an off-line cycle route. This option was examined but not considered a viable solution due to a number of factors. Firstly, Pembroke Road is defined as a primary cycle corridor in the GDA Cycle Network Plan. In addition, alternative routes were examined in order to determine if suitable cycle routes could be facilitated

on a number of adjacent streets and lanes, but each of these routes were found to not meet the criteria of a primary cycle track under criteria including directness, safety and attractiveness and comfort; and

- Option of providing one-way general traffic outbound (as in Route Option PR3) yet with the removal of all on-street parking (as in Route Option PR2). This option was examined and sifted out, as such an option was not expected to offer the same benefits arising from a Bus Gate arrangement, in terms of Environmental criteria (with the Bus Gate option PR4 scoring higher in all Environmental sub-criteria with the exception of Soils, Geology & Hydrogeology under which it was neutral), while sharing negatives arising from both the one-way arrangement being assessed (regarding Traffic Integration) and the removal of parking being assessed (regarding loss of parking under Land Use Character)."

All reasonable alternatives for this section of the Proposed Scheme have been considered. Furthermore, the Preferred Route Option best meets the objectives of the Proposed Scheme and performs the best under the assessment criteria as outlines in the 'Common Appraisal Framework for Transport Projects and Programmes' published by the Department of Transport, Tourism and Sport (DTTAS), March 2016.

In relation to access to the businesses on Baggot Street Upper, access to these businesses by sustainable modes will be greatly improved following the implementation of the Proposed Scheme as well as the amendments to the bus network service routing, with expected bus journey time reductions, more dependable bus services and increases in the frequency of bus services across the network as a whole. This serves to achieve the aim of the Proposed Scheme which is to provide enhanced walking, cycling and bus infrastructure on this key access corridor in the Dublin region, which will enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor. It is further noted that a significantly enhanced public realm is also proposed including new tree planting, bicycle parking (27 Sheffield stands with space for 52 bicycles) and spill out areas that will establish a more cohesive village environment and with high quality materials that reflect those of the traditional built environment. Access by private vehicle will still be possible to both the Pembroke Road and Baggot Street Upper area outside of the hours of operation of the bus gate. It is noted that general traffic access to Baggot Street Upper will be maintained at all times, however during the hours of operation of the bus gate, general traffic will not be able to access Baggot Street Upper from Pembroke Road.

2.3.3.6 *The proposed restriction of right turns from Mespil Road*

Summary of issue

A number of submissions highlighted the proposed restriction of the right turn for general traffic from Mespil Road onto Baggot Street Upper as a concern, noting that it will further restrict access to the Baggot Street area by private vehicle.

Response to issue

The proposed restriction for general traffic turning right from Mespil Road onto Baggot Street Upper is required to improve the operation of this key junction in order to prioritise the sustainable modes of walking, cycling and buses at this junction. It is noted that all other right turn movements at this junction are currently restricted, and as such the restriction of the only currently permitted right turn, i.e. from Mespil Road to Baggot Street Upper, will significantly improve the operation of this junction and allow for bus and cyclist movements along the CBC to be prioritised and operate as efficiently as practicable. Access to the Upper Baggot Street area by private car will still be maintained, albeit motorists will be required to take alternative routes, such as via Burlington Road or from Baggot Street Lower. It is further noted that due to the proposed bus gate on Pembroke Road, it is envisaged that the demand for this right turn movement will be significantly reduced following the implementation of the Proposed Scheme. Access to the businesses on Baggot Street Upper by sustainable modes will be greatly improved following the implementation of the Proposed Scheme as well as the amendments to the bus network service routing, with expected bus journey time reductions, more

dependable bus services and increases in the frequency of bus services facilitating local access and efficient hop-on and hop-off for shopping and restaurant usage.

2.3.3.7 Difficulty for vulnerable road users crossing the road

Summary of issue

A number of submissions raised the concern that the Proposed Scheme will create additional difficulty for Vulnerable Road Users, namely the elderly, the mobility impaired and those with small children, in crossing the road.

Response to issue

One of the primary objectives of the Proposed Scheme is to:

“Ensure that the public realm is carefully considered in the design and development of the transport infrastructure and seek to enhance key urban focal points where appropriate and feasible.”

A key element in considering the public realm is providing safe, comfortable facilities for pedestrians, and in particular vulnerable pedestrians, who sit at the top of the hierarchy of road users, as outlined in the Design Manual for Urban Road and Streets (DMURS). Providing high-quality pedestrian facilities, including appropriate crossing facilities, has been a core element of the design of the Proposed Scheme.

Chapter 6, Traffic and Transport, of the EIAR outlines the methodology followed in assessing the impact of the Proposed Scheme with respect to the baseline environment. Section 6.4.6.1.1.1 notes the following:

“The impacts to the quality of the Pedestrian Infrastructure as a result of the Proposed Scheme have been considered with reference to any changes to the existing pedestrian facilities along footpaths and crossing locations within the direct study area. Reference has been made to the overall changes along the full length of the Proposed Scheme and the impact assessment primarily focuses only on the pedestrian facilities at junctions to provide a direct comparison between the Do Minimum and Do Something scenarios. Where the Proposed Scheme introduces a change to a junction layout, the impact on pedestrians has been assessed using a set of criteria which has been derived from guidance listed in Section 6.9. The contents of Table 6.18 outline the assessment criteria for each junction.

Table 6.18: Pedestrian Junction Assessment Criteria

Aspect	Indicator
Routing	Are pedestrian crossings (signalised or uncontrolled) available on all arms?
Directness	Where crossings are available, do they offer direct movements which do not require diversions or staggered crossings i.e., no or little delay required for pedestrians to cross in one direct movement?
Vehicular speeds	Are there measures in place to promote low vehicular speeds, such as minimally sized corner radii and narrow carriageway lane widths?
Accessibility	Where crossings exist, are there adequate tactile paving, dropped kerbs (or raised table treatment) and road markings for pedestrians (including able-bodied, wheelchair users, mobility impaired and pushchairs)?
Widths	Are there adequate footpath and crossing widths in accordance with national standards?

The level of service (LoS) rating demonstrated in Table 6.19 has been applied to each junction for both the Do Minimum and Do Something scenarios based on whether the above indicators have been met.”

Table 6.19: Pedestrian Junction Assessment LoS

LoS	Indicators Met (of a Total of 5)
A	5
B	4
C	3
D	2
E	1
F	0

It is noted that there is currently no pedestrian crossing on the north-western arm of the R816 Baggot Street Upper / Waterloo Road signalised junction. The Proposed Scheme proposes a signalised crossing on this arm of the junction, significantly improving crossing facilities for pedestrians, including vulnerable pedestrians, in this location. The Pedestrian Infrastructure Assessment, included in Appendix A6.4 of the EIAR notes that the overall Level of Service for pedestrians at this junction will be improved from a D to and A due to the Proposed Scheme.

Similarly, there is currently no pedestrian crossing on the north-western arm at the R816 Macartney Bridge / R111 Haddington Road / R816 Baggot Street Upper / Mespil Road signalised junction. The Proposed Scheme proposes a signalised crossing on this arm of the junction, significantly improving crossing facilities for pedestrians, including vulnerable pedestrians, in this location. The overall Level of Service for pedestrians at the R816 Macartney Bridge / R111 Haddington Road / R816 Baggot Street Upper / Mespil Road signalised junction increases from an E to an A due to the Proposed Scheme.

It is further noted that Appendix I1 of the Preliminary Design Report within the Supplementary Information includes an Accessibility Audit Report which assessed the existing situation along the route of the Proposed Scheme to identify existing issues and problems for people with mobility impairment. A number of issues including issues with parking provision, drainage, footpath levels, crossing points and tactile paving surfaces, among others were highlighted during this audit. The Proposed Scheme will address these issues, and will provide significantly improved facilities for vulnerable road users.

As such, it is noted that the Proposed Scheme will significantly improve facilities for pedestrians in the Baggot Street Upper area, including improved crossing facilities with shorter crossing distances than before in some cases.

2.3.3.8 *Impact on the character (social or otherwise) of the area*

Summary of issue

A number of submissions make reference to the impact of the Proposed Scheme on the character of the Baggot Street Upper area. Some submissions refer to perceived negative impacts on the streetscape which they note is rich with cultural and architectural heritage. Other submissions use more general language and refer to the destruction of the area due to the Proposed Scheme.

Response to issue

The Proposed Scheme has been designed to enhance local communities and urban villages. Section 14.7.4 of the Preliminary Design Report (PDR) notes the following with respect to the proposed Urban Realm improvements on Baggot Street Upper:

“At Baggot Street Upper, pedestrian footpath space is to be increased so as to create a more accessible, attractive and pedestrian friendly village environment in which both sides of the street are more strongly connected (refer to Figure 14.9). Additional urban realm space will permit new tree planting, bicycle parking and spill out areas that will establish a more cohesive village environment and with high quality materials that reflect those of the traditional built environment. Improvement in

pedestrian facilities and urban realm will extend to incorporate the bridge crossing Grand Canal and leading into Baggot Street Lower.”

The impacts of the Proposed Scheme in relation to townscapes and visual impacts have been assessed within Chapter 17 of the EIAR, Landscape (Townscape) and Visual. This Chapter highlights the status of Baggot Street Upper as a Conservation Area (CA).

Due to the substantial works proposed, the post-mitigation Construction Stage impact in this location has been categorised as Negative, Very Significant and Temporary / Short-Term.

The following is noted with respect to the Operational Phase:

“The Operational Phase of the Proposed Scheme will involve substantial changes along the corridor of the Proposed Scheme particularly along Pembroke Road and Baggot Street Upper. The changes will not alter the overall townscape, however, there will be a notable positive effect on some areas of streetscape character along this section of the Proposed Scheme with improved junction layouts, new planting, paving and street trees, most notably at Baggot Street Upper and to a lesser extent on Baggot Street Lower, Pembroke Road and Fitzwilliam Street, and at Grand Canal where there will be improved ramped access to McCartney Bridge. The magnitude of change is medium.

The potential townscape / streetscape effect of the Operational Phase is assessed to be Positive, Moderate and Short-Term, becoming Positive, Moderate / Significant and Long-Term.”

A number of photomontages have been prepared which document the visual impact of the scheme post implementation. These photomontages are included in Figure 17.2 of Volume 3 of the EIAR, and are reproduced below.



Figure 2.43: Baggot Street Upper - View 1, Existing Situation



Figure 2.44: Baggot Street Upper – View 1, Post-Implementation of the Proposed Scheme



Figure 2.45: Baggot Street Upper - View 2, Existing Situation



Figure 2.46: View 2, Post-Implementation of the Proposed Scheme

It is acknowledged that there will be a temporary / short term significant negative impact on Baggot Street Upper during the Construction of the Proposed Scheme, which will be minimised as much as is practicable through appropriate mitigation measures.

Notwithstanding this, the long-term impacts during the operational phase of the Proposed Scheme will be positive and moderate to significant, as evidenced in the photomontages reproduced above.

2.4 Whole Scheme

2.4.1 Overview of Submission

Submissions relating to the whole scheme are listed below and detailed in the following sub-sections:

- 02 Dún Laoghaire Rathdown County Council
- 03 Brendan Heneghan
- 43 Dublin Community Coalition
- 59 Dublin Cycling Campaign
- 71 Development Applications Unit
- 95 Dublin City Council

2.4.2 31 – Dún Laoghaire-Rathdown County Council

Structure of Submission

Dún Laoghaire-Rathdown County Council's (DLR) submission comprises 26 pages and is sectionalised numerically. For ease of reference, the DLR section numbering and sub-section numbering conventions have been retained throughout the NTA's response as set out in the following paragraphs. The NTA's response to the submission is set out as follows:

- Section 1 – Introduction and Planning Policy
- Section 2 – Traffic and Active Travel recommendations
- Section 3 – Landscape, Public Realm and Architectural Conservation recommendations
- Section 4 – Environment and Biodiversity Recommendations
- Section 5 – Drainage, Road Maintenance, Public Lighting and Pollution Control Recommendations.

Introduction

The Belfield / Blackrock to City Centre Core Bus Corridor Scheme (hereinafter referred to as the "Proposed Scheme") within the Dún Laoghaire-Rathdown County Council area is one of 12 schemes to be delivered under the BusConnects Dublin - Core Bus Corridors Infrastructure Works (hereinafter referred to as the "CBC Infrastructure Works"). The CBC Infrastructure Works is one of the initiatives within the NTA's overall BusConnects Programme.

Section 1

Overview of Submission

DLR declare their support for the Proposed Scheme at the outset of the submission, stating that the BusConnects Core Bus Corridor Infrastructure projects present a major opportunity for transformative improvements for both cycling and public transport infrastructure within DLR County Council and the wider Dublin area. The submission also sets out the County Development Plan and Blackrock LAP objectives which support the Proposed Scheme.

DLR believes that their recommendation in submission will add value and help maximise the move to sustainable travel. The submission outlines how modal shift is essential to the creation of a compact, connected and climate resilient County and the provision of enhanced public transport and cycling facilities will greatly assist with hastening the change.

Response to submission

DLR's support for the scheme is noted and welcomed by the NTA. The NTA acknowledges DLR's request that their recommendations be considered, and this is discussed further in the following sections.

Section 2 - Traffic and Active Travel recommendations

Overview of Submission

'The Board is requested to:

- *ensure that all bus stops are adequately set back from junctions to avoid buses potentially backing up and blocking traffic and to also ensure that visibility of junction traffic signal heads for oncoming traffic is not impeded.*
- *ensure that adequate stacking space for cyclists is provided, especially at protected junctions, to accommodate cyclists waiting to cross the road and to take into account the anticipated increase in cycle traffic over the years ahead.'*

DLR note that cycle times have been extended to 120 secs *'to maximise the throughput of people through the junction'* but contend that increasing the cycle time increases the throughput of cars only and that peds, cyclists and buses do not benefit from longer cycle time.

DLR note that at some junctions, *'there are separate stages for each mode (presumably for safety reasons)'*. Currently cyclists have more green time than would be proposed as a result.

DLR concerned about cyclist compliance with phasing where straight through cyclists are on red while straight through car are on green.

DLR suggest that Results of DCC trials should be used to decide final detailed design of protected junctions.

DLR request a condition for a trial junction with significant car and cyclist traffic and that final design and phasing is agreed with DLR.

DLR believe the best way to mitigate the impacts of traffic reassignment is to expedite the approval/construction of the Bray to CC Scheme.

Side Roads:

DLR query the uncontrolled side road detail (e.g. Temple Park Avenue).

Specific Comments

DLR request design amendment at Monkstown Rd junction to facilitate inbound cyclists from Monkstown.

DLR request consideration of all red ped stage at Monkstown Rd junction as well as removal of staggered Toucan with a fully protected junction.

DLR argue that the proposed Newtown Ave junction is poorer than existing. St Teresa's Development has been granted permission and offers a better junction solution. DLR request prior agreement of final design with DLR.

DLR requesting to not carry out proposals at George's Ave and to have a post-construction monitoring of George's Ave, to determine traffic control measures.

DLR argue that removal of cycle slip lanes at Mount Merrion Avenue results in reduced LoS so should be retained within proposed design as there is plenty of room.

DLR argue that the right lane to Sion Hill / Castledawson is excessive and could be reduced to increase planting/SUDS in median. DLR request a ped crossing here also.

Blackrock Clinic: DLR request prior agreement and engagement re: junction layout due to 3rd part planning application.

DLR concerned that traffic congestion (temple Hill down to one inbound lane) will impede buses accessing the CBC, and request due consideration to how this is addressed and mitigated in the Proposed Scheme.

Response to submission

Set back of bus stops from junctions

Appendix H to the Preliminary Design Report in the Supplementary Information includes the Bus Stop Review Report for the Proposed Scheme, which outlines the approach taken to rationalise bus stop quantity, location and spacing along the Proposed Scheme corridor.

Appendix A within the Bus Stop Review Report presents the more general Bus Stop Review Methodology Report. This report outlines the basic criteria for consideration when locating a bus stop along the Proposed Scheme:

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

The above criteria have been adopted on the Proposed Scheme as much as practicable. Some bus stops have been retained in the existing location or close to it (for example, CH A 050 outbound, CH A 575 outbound, CH A 1020 outbound, CH A 1050 inbound, CH A 1200 outbound, CH A 1325 inbound). In general, where bus stop locations are being amended, the new bus stop has been located on the downstream side of a junction as outlined in Section 5 of Appendix H Bus Stop Review Report. This avoids stationary buses impacting on visibility of approaching vehicles (for example, blocking junction signal heads). It also avoids stationary buses at bus stops impacting on the progression of general traffic through the junction, if the bus stop were located on the upstream side of a junction. In the case of the Proposed Scheme, most bus stops are located within a dedicated bus lane, therefore avoiding any impact on the progression general traffic. Examples if this are at CH A140 inbound, CH A 580 inbound, for example.

There are some bus stops that have been retained at or very close to their current location, and in doing so, contradict the aforementioned advice in relation to locating bus stops. For example:

- CH A 575 Outbound – bus stop retained in current location on the approach to the Temple Road / Frascati Road / Barclay Court junction. Locating this bus stop on the downstream side of the junction would impact on existing public realm and art installation.

also, an existing bus stop on the downstream side of the Booterstown Avenue junction is proposed to be relocated to CH A 2300 on the upstream side of the junction due to the following:

- Available space to locate both a local bus stop and a private coach (layby) bus stop;
- Existing pedestrian crossing and desire line is on the south-eastern arm of the junction, connecting the DART Station and the south-western side of Rock Road. There is no existing pedestrian crossing on the north-western arm of the junction, and none proposed as part of the Proposed Scheme.

Adequate stacking space for cyclists

The junction types set out in Appendix A4.1 BusConnects Preliminary Design Guidance Booklet (PDGB) of the EIAR directly align to the Proposed Scheme core aim and objectives. One of the core aims of the Proposed Scheme is to:

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

The proposed scale of the BusConnects CBC Infrastructure Works will be transformational for cycling in Dublin, delivering a large number of the primary cycling routes identified in the Greater Dublin Area Cycle Network plan. The ambition of the PDGB was to take the benefits of the traditional junction layout from the National Cycle Manual and supplement this with a range of measures aimed at increasing protection for cyclists and reducing uncontrolled conflict with pedestrians.

The Netherlands has one of the highest rates of bicycle use in the world, provides the widest range of cycling know-how and is famous worldwide for its cycling infrastructure. The ‘Ontwerpwijzer Fietsverkeer’ (Dutch Cycle Design Guide) was used during the development of the PDGB. Of particular interest to the PDGB team, was how the design of junctions could be improved to offer better protection to cyclists.

The typical protected junction layout in Figure 2.47 below offers significant safety improvements compared to the traditional junction layout. The deflection of the cycle track at the junction allows the protection kerb (Note 4) to be positioned on the corner of the junction. In urban locations subject to spatial constraints, the protection kerb provides a tighter turning radius for vehicles and will force the left-turning motorist to reduce speed before making the tighter turn. This design layout also keeps straight-ahead and right-turning cyclists on the raised-adjacent cycle track as far as the junction, avoiding any cyclist-vehicle conflict at weaving and merging lanes, for example, where access to a dedicated left-turn lane would previously have necessitated a vehicle to cross the cycle lane. Right-turning cyclists will navigate the cycle lane on the junction and turn right (in a controlled manner) after it crosses the side arm. Other benefits to this junction design include:

- a) Traffic Signal arrangement removes any uncontrolled pedestrian-cyclist conflict;
- b) Raised and protected cycle track approaching junction;
- c) Reduced risk of side-swipe due to the removal of cyclist-vehicle conflict at weaving and merging lanes on all approaches;
- d) Improved right-turning safety; and
- e) Improved sight lines for left turning traffic.

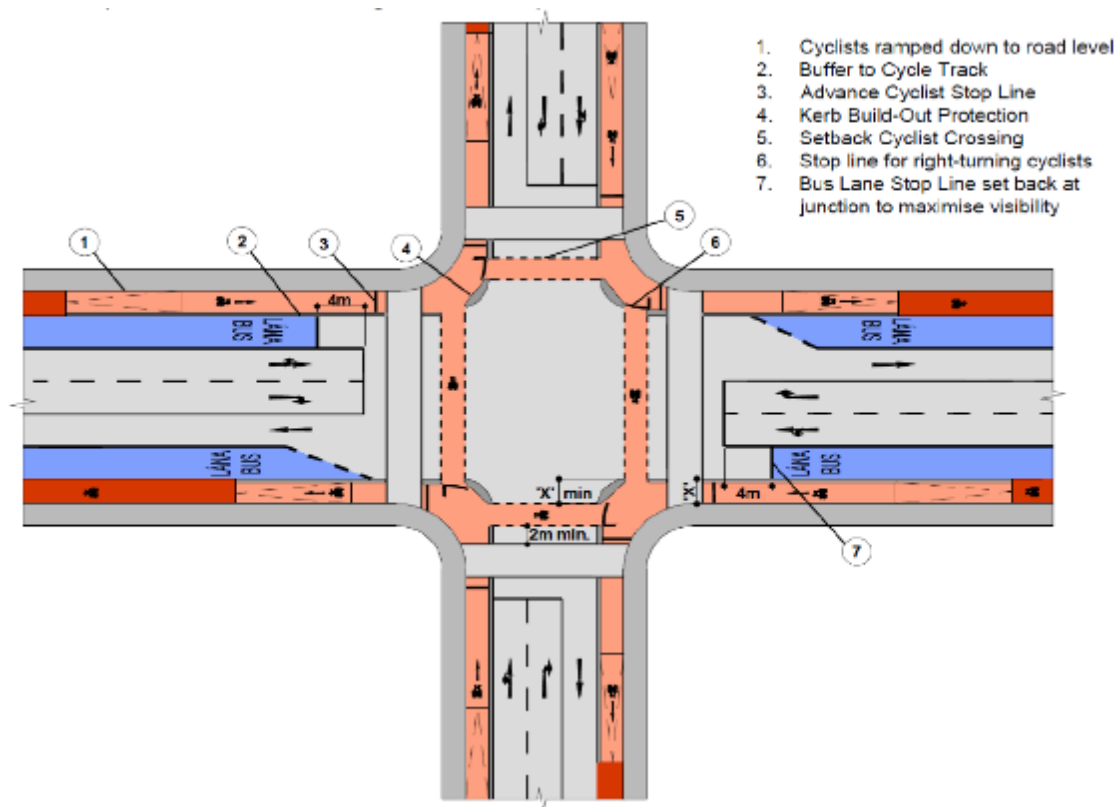


Figure 2.47: Typical Junction Layout from BusConnects Design Guidance Booklet

In constrained urban locations, the space available at junctions for the introduction of the projected junction design principles will be restricted, and so will be the ability to provide more than the standard cycle track width on approaches to junctions. Stacking space will benefit from the following:

- Advance cycle stop line on approaches to junctions ahead of the general traffic and bus lane stop lines to maximise stacking space and also maximise visibility of cyclists ahead of general traffic and buses;
- Phasing and staging of the proposed traffic signals whereby left turning cyclists can proceed even when straight ahead cyclists are on red. This will minimise the quantum of cyclists stacking at a stop line;
- Early start signal for cyclists to allow cyclist to proceed before vehicles get green;
- A secondary stop line and stacking room behind the kerb build-outs provided for right-turning cyclists making a hook-turn;
- Unimpeded cycle track provision on approaches to junctions, whereby the Proposed Scheme provides 100% coverage of segregated raised-adjacent cycle track.

120 Second Cycle Time

For the purposes of the Traffic assessment as part of Chapter 6 of the EIAR, a 120 second cycle time (for a cycle of all of the traffic light stages at a junction) was applied across all junctions within Dún Laoghaire-Rathdown County Council. It is expected, however, that in practice, the corridor will operate on an adaptive basis, permitting reduced cycle times when traffic volumes drop momentarily (preventing any lost green time) and permitting priority to be applied to different modes including, for example, hurry calls for buses. Whilst pedestrians and cyclists benefit from shorter cycle time, on

balance, considering the overall demand of each mode within a cycle, the 120 second cycle time caters best for overall People Movement, as prescribed in section 6.1.1.1 of Chapter 6 of the EIAR.

Currently cyclists have more green time than would be proposed

DLR contend that, due to separate stages being proposed for each mode at some junctions, cyclists have more green time currently than would be proposed.

Whether cyclists run with straight ahead traffic or whether they run on their own depends on the junction type. No two junctions are the same. Junctions on the Proposed Scheme have broadly been categorised into 4 types of junction as set out in Appendix A4.1 BusConnects Preliminary Design Guidance Booklet (PDGB) of the EIAR and specifically set out at each location in the Junction Design Report (Appendix A6.3) and summarised in Table 4.5, Table 4.12, Table 4.18, Table 4.25 and Table 4.32 in Chapter 4 of the EIAR. A more detailed description of the Junction types on the Proposed Scheme is provided in Sections 5.3.3.1, 5.3.3.2, 5.3.3.3 and 5.3.3.4 of the Preliminary Design Report with a detailed summary of the junction types along the Proposed Scheme also provided in Table 5-1 and Table 5-2 of the Preliminary Design Report. It should be noted that only junction Types 1 and 3 are proposed for the Proposed Scheme, i.e. neither Junction Type 2 nor 4 are proposed.

Each junction within the Proposed Scheme has been designed taking into consideration anticipated demands and predicted operation. Staging and signal times have been proposed on a case-by-case (junction-by-junction) basis considering multiple factors including safety and demand.

Concerns about cyclist compliance

The Proposed Scheme and the proposed scale of the BusConnects CBC Infrastructure Works overall will be transformational for cycling in Dublin, delivering a large number of the primary cycling routes identified in the Greater Dublin Area Cycle Network plan. With proposals of this scale, it is critical that the overall design approach matches the stated ambition, and can achieve a longevity that such investment deserves. In the case of the Proposed Scheme, the percentage of fully segregated cyclist facilities across the entire corridor will increase from 4% to 100% as indicated in Table 4.1 of Chapter 4 of the EIAR.

A Level of Service (LoS) assessment was undertaken using an adapted version of the NTA's National Cycle Manual Quality of Service (QoS) Evaluation criteria. The results of the Cycling Qualitative Assessment on Section 1 of the Proposed Scheme (between the R827 Stradbroom Road and the L1003 Booterstown Avenue) in Table 6.25 of Chapter 6 of the EIAR, demonstrate that the LoS during the Do Minimum scenario consists of B ratings. During the Do Something scenario, the LoS consists predominantly of the highest A / A+ ratings. Given the quality of the existing cycling infrastructure along the Proposed Scheme, the improvements will have a Positive, Moderate and Long-term effect on the Proposed Scheme between the R827 Stradbroom Road and the L1003 Booterstown Avenue.

Table 6.49 and table 6.50 of Chapter 6 of the EIAR outline the AM and PM peak hour trips expected by mode in the 2028 traffic model. Cycling is projected to increase its modal share from 4% to 16% during the AM peak hour and from 5% to 19% during the PM peak hour. In absolute numbers, this equates to an increase from 60 trips to 230 trips during the AM peak hour (283% increase) and an increase from 60 trips to 230 trips during the PM peak hour (267% increase).

As for all road users, it will not be practicable to ensure that all future cyclists on the Proposed Scheme will comply with all traffic management measures, however, when one considers the significant increase in cyclist numbers projected, those prepared to not comply with the traffic management measures is expected to be a low percentage of the overall quantum of cyclists and that the consistency across the over BusConnects Infrastructure programme will ensure that cyclists adapt to the design principles outlined in Appendix A4.1 BusConnects Preliminary Design Guidance Booklet (PDGB) of the EIAR.

Use of Results of DCC trials for final detailed design of protected junctions

DCC have been monitoring a small number of junctions that have been installed in recent years which have trialled design concepts similar to that of the PDGB as set out in Appendix A4.1 of the EIAR. Whilst the junctions in question (for example junction of Balbutcher Lane and Hampton Wood) don't facilitate dedicated bus lanes on any approach, the manner in which they control vehicle / cyclist conflict at the junction is similar to that of the Proposed Scheme. The design team of the Proposed Scheme have been liaising with DCC's BusConnects Liaison Office throughout the design period including in relation to the newly installed junction at Balbutcher Lane and Hampton Wood junction. This liaison will continue for the detailed design process.

Condition for a trial junction

It isn't proposed that a trial junction be constructed as part of the Proposed Scheme. As noted above, the Proposed Scheme has been designed to achieve the stated objectives, and this allows for all junctions in practice to operate on an adaptive basis, permitting priority to be applied to different modes. The EIAR as submitted has robustly addressed this matter.

Traffic Reassignment (Mitigate impacts of traffic reassignment by expediting the approval/construction of the Bray to CC Scheme).

DLR are carrying out their own active travel measures and are concerned about traffic reassignment in these areas as a result of the Proposed Scheme, suggesting that the expedition of the Bray to City Centre Core Bus Corridor Scheme will allay their traffic reassignment concerns.

For the purpose of planning, all BusConnects Infrastructure Schemes will undergo their own separate planning process. Each scheme will be designed and assessed in isolation on its own merits and will be capable of operating as a stand-alone scheme without any dependence on other or adjacent BusConnects schemes. The Bray to City Centre Core Bus Corridor Scheme is no different and when the time comes, will be assessed independently of the Belfield / Blackrock to City Centre Core Bus Corridor Scheme.

Treatment of Side Roads

DLR highlight the proposed entry treatment at Grotto Avenue as the exemplar for side road treatment and raise concerns that other side roads have cycle lanes at grade with the carriageway.

To ensure pedestrian priority at side roads, physical interventions in the form of raised table side entry treatments, and raised cycling infrastructure are proposed in line with Appendix A4.1 BusConnects Preliminary Design Guidance Booklet (PDGB) of the EIAR. Figure 30 of the PDGB (see Figure 2.48 below) illustrates how a footpath and raised-adjacent cycle track will cross an uncontrolled T-junction.

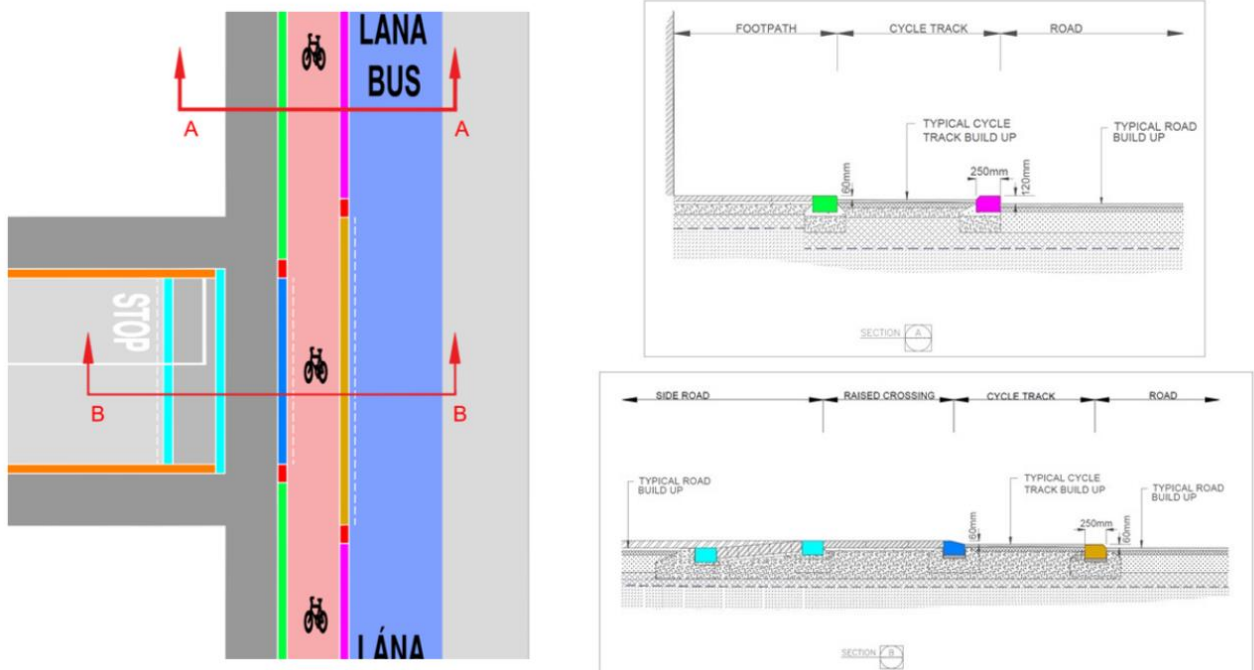


Figure 2.48: extract from Figure 30 of Appendix A4.1 (Preliminary Design Guidance Booklet)

The principle of how the raised kerb between the cycle track and the bus lane is dropped across the side road can be visualised by observing how the kerb between the bus lane and the cycle track in Section A (purple kerb) transitions from 120mm high to 60mm high in Section B (orange kerb). Whilst this kerb height transitions, the level of both the footpath and the cycle track across the side road remains at 120mm above the carriageway and 60mm above the carriageway respectively. The 60mm kerb between the cycle track and the footpath remains also across the side road. This detail allows for the entry treatment to be applied at side road T-junctions where there is no parking either side of the side road.

In situations where parking is provided on either side of a side road (Grotto Avenue, Raglan Road), Figure 31 of the PDGB (see Figure 2.49 below) details how the platform upon which the raised-adjacent cycle track will cross an uncontrolled T-junction, extends to meet the kerb at the edge of the carriageway. Localised road markings will define the roadside edge of the cycle track across the side road.

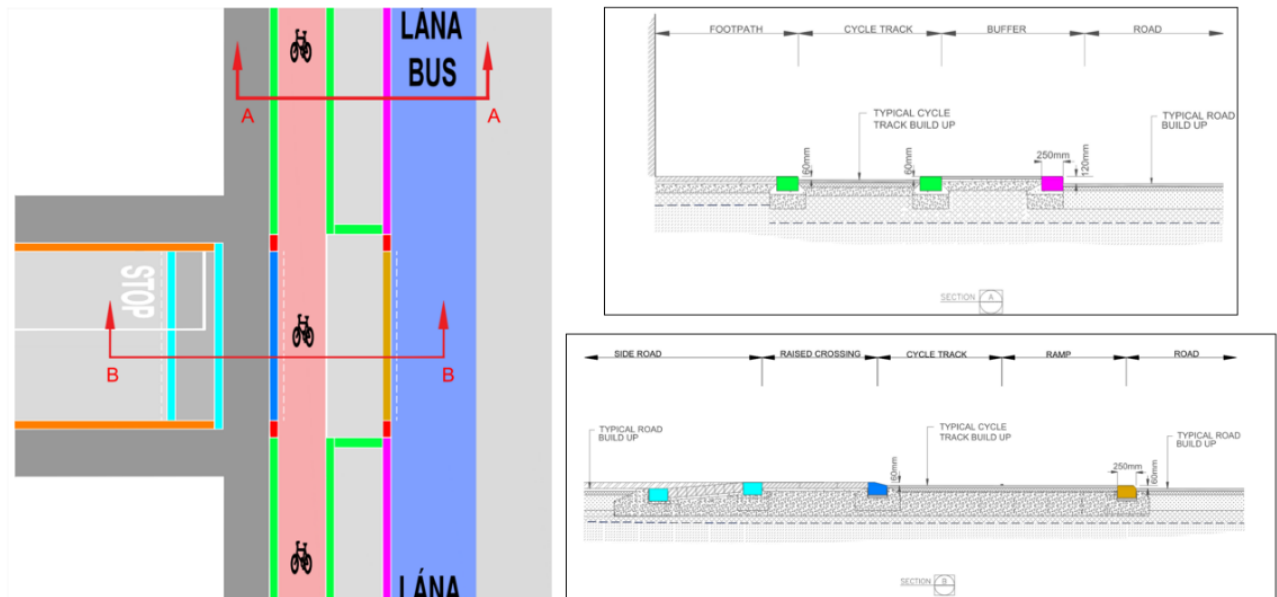


Figure 2.49: extract from Figure 30 of Appendix A4.1 (Preliminary Design Guidance Booklet)

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

The Proposed Scheme will increase the number of raised table crossings on side roads from 9 in the Do Minimum to 55 in the Do Something scenario, equating to a 511% increase.

Specific Locations

Monkstown Road Junction

A design amendment has been suggested at the Monkstown Road approach to the Temple Hill junction to facilitate cyclists travelling inbound from Monkstown Road to Temple Hill (northbound). Cycle movement is accommodated via the proposed shared area at the corner of the junction to allow the inbound cyclist on Monkstown Road use the existing Toucan crossings (which will be retained) on the southern arm of the junction. This enables the inbound cyclists from Monkstown Road gain access to the inbound cycle track on Temple Hill as illustrated in Figure 2.50 below and outlined in section 4 (Junction Design and Modelling Results) of Appendix A6.3 Junction Design Report for the Temple Hill / Temple Crescent junction.

An all red pedestrian stage of the traffic signals is already proposed at this junction as part of the Proposed Scheme, as indicated in section 4 (Junction Design and Modelling Results) of Appendix A6.3 Junction Design Report for the Temple Hill / Temple Crescent junction.

A fully protected junction was considered at this junction, however, the tall, large CCTV camera pole in the central median of the southern arm of the junction is a constraint to this layout, including a direct crossing to replace the existing staggered crossing, therefore, the Proposed Scheme will tie in to all existing facilities on all arms at the southern extents of the Proposed Scheme.

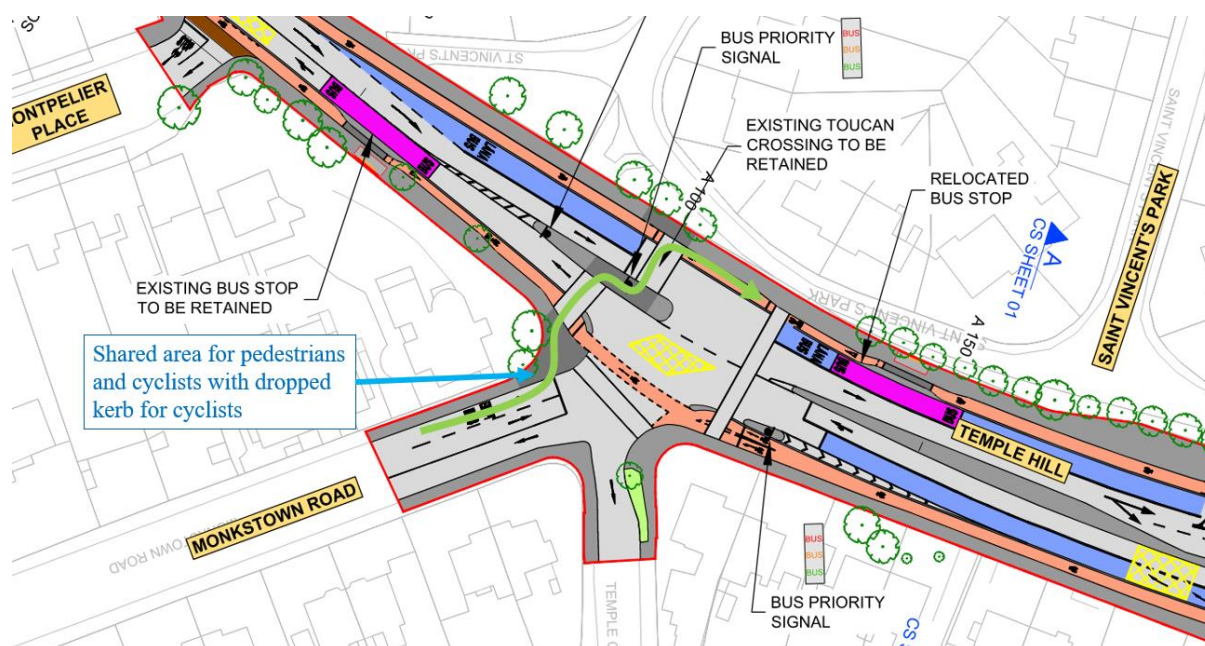


Figure 2.50: Facilities for Inbound Cyclists from Monkstown Road

Newtown Avenue junction

In relation to the DLR suggestion that the Newtown Avenue junction design should incorporate the amended junction design as put forward by the St. Teresa's Development in adjacent lands, it is noted that the decision to grant planning for that development (An Bord Pleanála reference ABP-312325-21) was made on April 14th 2022 at a time when the design for Proposed Scheme had been finalised in advance of a lodgement to An Bord Pleanála on May 12th 2022.

The Proposed Scheme caters for all road users at the Newtown Avenue junction and has been designed in accordance with all relevant standards and guidelines as well as in accordance with Appendix A4.1 BusConnects Preliminary Design Guidance Booklet (PDGB) of the EIAR. The NTA will liaise with DLR in relation to the Newtown Avenue junction, should the St. Teresa's Development proceed.

George's Avenue

In relation to DLR's request to not carry out proposals at George's Avenue and to instead, have a post-construction monitoring of George's Avenue, to determine traffic control measures, it is noted that the interventions put forward as part of the Proposed Scheme are based on the environmental risk that the Proposed Scheme would pose. Without those interventions, therefore, any delay in the implementation of the proposed interventions at George's Avenue will risk the introduction of the impacts identified as part of the proposed design and assessment process.

During the development of the Proposed Scheme design, traffic modelling was undertaken in parallel to identify potential implications arising from the proposals and allow the design to be refined to mitigate any potential impacts. The modelling carried out is set out in Chapter 6 of the EIAR. The modelling predicted traffic volumes along the corridor and surrounding roads and these traffic volumes were then examined by environmental specialists to assess the impacts of changes in traffic volumes on roads.

When the Local Area Model (LAM) of the Proposed Scheme was run, the Annual Average Daily Traffic (AADT) volumes were provided to the Air and Noise specialists. These specialists carried out air and noise modelling of the scheme to identify any locations where an unacceptable deterioration in air quality or noise volumes may occur.

This assessment identified that, as a result of the Proposed Scheme, additional traffic would be attracted onto George's Avenue, between Anglesea Avenue and Frascati Road. This was observed to be traffic which would traditionally travel down Carysfort Avenue and turn left onto Frascati Road but was now seen to divert onto Anglesea Avenue and then to George's Avenue before turning left onto Frascati Road. This diversion was assessed in terms of air quality and noise impacts and a predicted negative noise impact classified as Moderate - Significant in the short term was identified. In order to mitigate against this, alternative proposals were considered.

While a number of potential mitigation measures were considered, including the full signalisation of the Frascati Road and George's Avenue junction, the restriction of traffic exiting from George's Avenue onto Frascati Road was identified as the preferred solution to deter traffic diverting to George's Avenue from Carysfort Avenue.

To prevent rat-running traffic from travelling along George's Avenue, it is proposed to close the exit from George's Avenue onto Frascati Road, creating a cul-de-sac at the northern end of George's Avenue (to the south of Frascati Road). This road will still be accessible to residents and visitors from Frascati Park, Sydney Avenue, Anglesea Avenue and Avoca Place as is currently the case, however, those exiting George's Avenue would now also exit the street via one of these streets. This will have the effect of removing all through traffic from the street and maintaining access to local traffic only.

George's Avenue, however, is a narrow street, which will require occasional access for larger vehicles such as refuse trucks, oil deliveries etc. There is limited space available to provide a turning bay for larger vehicles at the northern end of George's Avenue. Therefore, it is proposed that egress for authorised vehicles only will be provided from George's Avenue onto Frascati Road.

Notwithstanding the primary reason for the proposals outlined above, the proposed arrangement provides significantly improved facilities for pedestrians and cyclists at this location. This is reflected in Chapter 6 of the EIAR where the pedestrian level of service increases from Level of Service (LoS) C to LoS B at the Frascati Road / George's Avenue junction (see table 6.24 of the EIAR) and the cyclist Level of Service increases from LoS B to LoS A (see table 6.25 of the EIAR).

Mount Merrion Avenue

In relation to DLR concerns about the Mount Merrion Avenue junction, it should be noted that the proposed cycle track on Mount Merrion Avenue approaching the Rock Road junction is 1.5m wide, which is acceptable as a desirable minimum cycle track width in Appendix A4.1 BusConnects Preliminary Design Guidance Booklet (PDGB) of the EIAR. Section 5.3 of the PDGB states the following:

'The minimum width is 1.5m, which, based on the National Cycle Manual (NCM) Width Calculator, allows for single file cycling. Localised narrowing of the cycle track below 1.5m may be necessary over very short distances to cater for local constraints (e.g. mature trees).'

In relation to the proposed removal of cycle slip lanes, it should be noted that the junction design is consistent with the protected junction design principles as per Appendix A4.1 BusConnects Preliminary Design Guidance Booklet (PDGB) of the EIAR. The protected junction caters for all cycle movements including cycle movements along the main desire line across the junction (Blackrock to City Centre inbound), which currently has to deal with left turning vehicles from Rock Road to Mount Merrion Avenue weaving across the inbound cycle lane.

Table 6.25 of Chapter 6 of the EIAR identifies the Level of Service (LoS) for Cycling infrastructure in Section 1 of the Proposed Scheme between the R827 Stradbrook Road and Booterstown Avenue. For the section between George's Avenue and Emmet Square (including the Mount Merrion Avenue junction), the LoS improves from B in the Do Minimum scenario to A in the Do Something scenario which will have a long-term positive impact on the quality of the cycling infrastructure.

It should also be noted that the proposed protected junction design, including the removal of the existing cycle slip lanes, affords the opportunity to increase and improve the public realm provision at the Mount Merrion Avenue junction. Table 6.24 of Chapter 6 of the EIAR identifies the Level of

Service (LoS) for Pedestrian infrastructure in Section 1 of the Proposed Scheme between the R827 Stradbroke Road and Booterstown Avenue. At the Mount Merrion Avenue junction, the LoS for pedestrians increases from D in the Do Minimum scenario to C in the Do Something scenario. The Proposed Scheme will have a long-term positive impact on the quality of the pedestrian infrastructure.

Sion Hill / Castledawson

The existing central medians at the entrance to Sion Hill / Castledawson provide an opportunity to create soft landscaping areas in a boulevard-style at this location and have been retained for this purpose. The length of the right turn pocket is defined by the existing median which is being retained for landscaping purposes. **Figure 2.51** below illustrates the amount of additional soft landscaping that is proposed as part of the landscaping design for the Proposed Scheme.

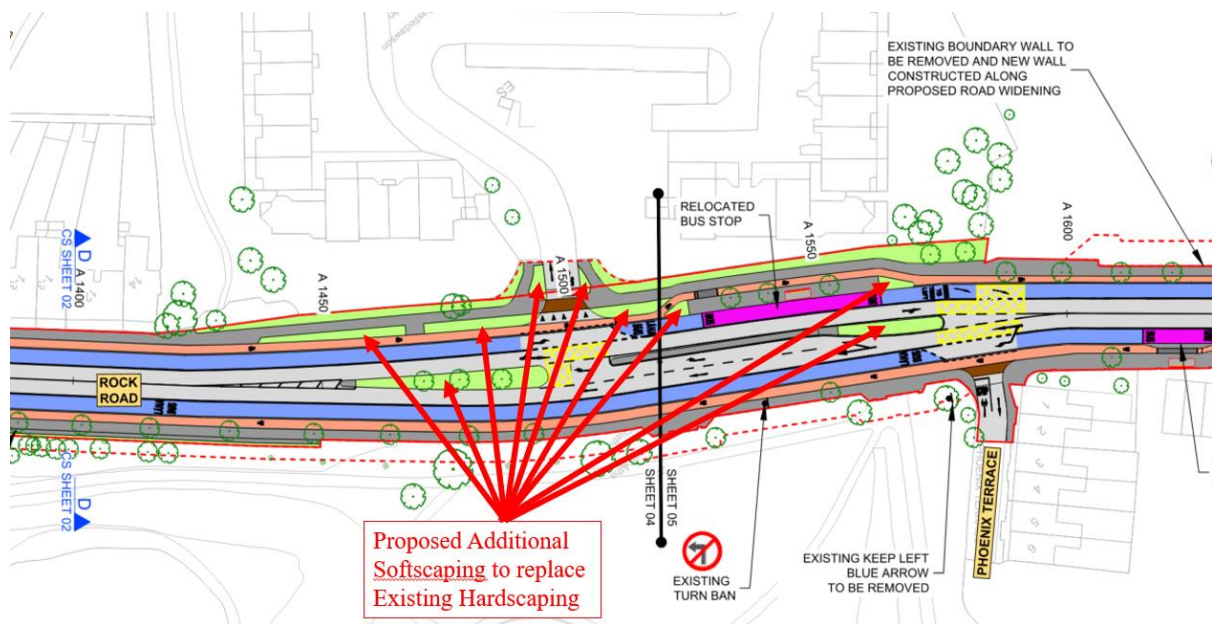


Figure 2.51: New Soft Landscaping Areas at Sion Hill / Castledawson

The pedestrian crossing facilities at both the Mount Merrion Avenue and the Blackrock Clinic junctions are considered to be located at the primary desire lines for crossing the Rock Road in this area.

Blackrock Clinic

The Proposed Scheme includes for the retention of the existing access junction at Blackrock Clinic in the absence of planning permission for an application for redevelopment at Blackrock Clinic (with the relocation of the access junction) at the time that the Proposed Scheme was lodged for planning to An Bord Pleanála on May 12th 2022. As acknowledged in the submission, the NTA has met with Blackrock Clinic on a number of occasions throughout the design process. As such the NTA have been aware of Blackrock Clinic's plans to seek permission for a new access junction in a location further south than the existing access junction. We note that planning permission for planning reference D22A/0490 was granted on August 31st 2022 by Dún Laoghaire-Rathdown County Council. As part of the engagement with Blackrock Clinic during the design process for the Proposed Scheme, the NTA have reviewed and commented on the junction relocation proposals and how they relate to the Proposed Scheme. It has been acknowledged that the proposed junction relocation is compatible with the Proposed Scheme.

Traffic Queues on Approach to the Core Bus Corridor

Chapter 6 Traffic and Transport of the EIAR outlines both the Do Minimum and the Do Something assessment scenarios for the projected opening year of 2028 and the design year of 2043. It should be noted that even without the Proposed Scheme in 2028 (Do Minimum), it is envisaged that the population will grow by 11% and 25% by 2043 (above 2016 census data levels). Similarly,

employment growth is due to increase by 22% by 2028 and 49% by 2043 (Source: NTA Reference Case Planning Sheets 2028, 2043). The assessment also assumes that goods vehicles (HGVs and LGVs) continue to grow in line with forecasted economic activity with patterns of travel remaining the same. For example, the assessment assumes a 45% and 77% increase in goods traffic versus the base year in 2028 and 2043 respectively. Therefore, whether the Proposed Scheme is implemented or not, buses approaching the core bus corridor from side roads off the main core bus corridor will more than likely experience an increased form of congestion.

The GDA Strategy (along with existing supply side capacity constraints e.g., parking availability, road capacity etc.) has the effect of limiting the growth in car demand on the road network into the future. Total trip demand will increase into the future in line with demographic growth (population and employment levels etc.). To limit the growth in car traffic and to ensure that this demand growth is catered for predominantly by sustainable modes, a number of measures will be required, that include improved sustainable infrastructure and priority measures delivered as part of the NDP/GDA Strategy. In addition to this, demand management measures will play a role in limiting the growth in transport demand, predominantly to sustainable modes only. The result will be only a limited increase or no increases in overall demand for travel by private car. The Proposed Scheme will play a key role in this as part of the wider package of GDA Strategy measures.

As indicated in Appendix A6.3 Junction Design Report of chapter 6 Traffic and Transport of the EIAR, the Temple Hill / Temple Crescent (Monkstown Road) junction will experience a Practical Reserve Capacity (PRC) of 53% in the 2028 AM Peak Traffic Model.

The implementation of the Proposed Scheme will result in changes in the quality of bus infrastructure provision along the route, including dedicated bus lanes and bus stop upgrades / relocations. Improvement in bus priority measures will reduce the interaction between buses and general traffic and reduce the likelihood of delays.

As indicated in Table 6.27, the Proposed Scheme improves the quality of existing bus infrastructure along Section 1 of the Proposed Scheme, which will provide long-term benefits for bus users and aligns with the overarching aim to provide enhanced bus infrastructure on the corridor. The impact for this section of the Proposed Scheme is medium. The sensitivity of environment rating is predominately categorised as high due to the high traffic levels and number surrounding community facilities within Blackrock local centre. This is predicted to result in a Positive, Very Significant Long-term effect Section 1 of the proposed Scheme between the R827 Stradbroke Road and the L1003 Booterstown Avenue.

The Proposed Scheme will have greater capacity to facilitate movement of people travelling along the corridor. A quantitative impact assessment has been undertaken using outputs from the NTA's ERM and LAM, comparing the Do Minimum and Do Something peak hour scenarios for each forecast year (2028, 2043). The results of the assessment demonstrate that there will be an increase in the number of people travelling along the corridor by sustainable modes of 86% and 105% during the 2028 AM and PM Peak respectively.

During the 2043 scenario there will be an increase of 113% and 107% in the number of people travelling along the Proposed Scheme by sustainable modes during the AM and PM Peak Hours respectively. The analysis also shows that there will be an increase of 11.3% and 12.3% of bus boarders during the 2028 AM and PM Peak Hours respectively. During the 2043 scenario there will be an increase of 16% and 18% in bus boarders during the AM and PM Peak Hours respectively. Overall, it is anticipated that the increases to the total number of people travelling through the Proposed Scheme will have a High Positive impact.

To give an overview of how the Proposed Scheme will impact on bus journey times along the corridor, outputs for the B3 service, which traverses the largest extent of the Proposed Scheme (Sections 1-4), have been extracted from the model and are presented in section 6.4.6.2.5.2 of Chapter 6 of the EIAR which states that the Proposed Scheme will deliver average inbound journey time service bus passengers of up to 6.6 minutes (20%) in 2028 (AM) and 5.2 minutes (16%) in 2043. Furthermore, results presented in Diagram 6.15 suggest an improvement in bus journey time reliability. Based on

the AM and PM peak hours alone, this equates to 8.2 hours of savings in 2028 and 7.6 hours in 2043, when compared to the Do Minimum combined across all buses. On an annual basis this equates to approximately 6,200 hours of bus vehicle savings in 2028 and 5,700 hours in 2043, when considering weekday peak periods only. Journey time variation and reliability are shown to improve in all Do Something scenarios compared to the Do Minimum. Overall, it is anticipated that the improvements to the network performance indicators for bus users along the Proposed Scheme will have a High Positive impact.

Based on the above data, the benefits of the Proposed Scheme will outweigh concerns raised in relation to suggested congestion gaining access to the core bus corridor.

Section 3 – Landscape, Public Realm and Architectural Conservation Recommendations

Overview of submission

Proposed Soft Landscaping

The submission notes concerns that the array of proposed trees and groundcover included as part of the Proposed Scheme may impede the achievement of a coordinated landscape design response. DLRCC request that An Bord Pleanála include a condition requiring the submission of comprehensive soft landscaping details for the prior agreement of DLRCC which include the following specific recommendations:

- Fewer species should be proposed to establish a coherent uniformity. Junctions and other key areas can be targeted for more diverse planting;
- The coastal nature of the route should be addressed with planting choices;
- Small pockets of planting should be omitted as they are difficult to maintain;
- Soft areas should be considered for SUDS;
- A 24 month establishment period will be required for all soft landscaping;
- New landscaping and tree planting should not obscure visibility of traffic signal heads.

A number of specific recommendations are also outlined:

Barclay Court

The submission requests a feature tree such as fastigate purple beech be considered for either side of the entrance to Barclay Court and woodland perennial mix and bulb planting should be considered beneath the existing and proposed roadside trees also in this location.

Castledawson and Blackrock Park

The submission requests that trees be provided in the green areas opposite Blackrock Park and adjacent to Castledawson. The submission also queries whether there is sufficient footpath width to accommodate the proposed trees adjacent to Blackrock Park and questions the need for the kick in the footpath in this location.

Willow Terrace and Green Strip Adjacent to Blackrock Park

The submission requests that trees be provided in the green areas adjacent to the entrance to Willow Park and within the Green Strip Adjacent to Blackrock Park.

Existing Landscaping including Landscaped Median on Temple Road

The submission requests that the landscaped median on Temple Road be included in the landscape design for the proposed scheme with the existing Buxus groundcover to be replaced with a herbaceous mix with all soft landscaping to be amalgamated into one large bed and extended to the kerb lines.

Proposed Hard Landscaping

The submission notes concerns that the proposed hard landscaping measures may impede the achievement of a coordinated landscape design response, especially if proposals are not sufficiently coordinated with public realm works being carried out by DLRCC at locations which interface with the Proposed Scheme. DLRCC request that An Bord Pleanála include a condition requiring the submission of comprehensive hard landscaping details for the prior agreement of DLRCC which include the following specific recommendations:

- Coordination should be carried out with public realm improvements in Blackrock Village currently being considered by DLRCC;
- Coordination should be carried out with DLRCC on proposed street furniture including public seating and bicycle stands, with the design scale and colour to be considered in the broader context of the area. Best practice in design is required regarding the needs of older people and those with mobility issues;
- Full details of all proposed new or relocated roadside boundary walls and treatments should be submitted for prior agreement with the Council; and
- Coordination with DLRCC is required regarding the creation and treatment of new landing areas at the main entrance to Blackrock Park opposite Mount Merrion Avenue and at pedestrian entrances to the park adjacent to the junction of Rock Road and Rock Hill. Paving and surface designs at both entrances to Blackrock Park, west of Phoenix Terrace also need to be submitted for prior agreement with DLRCC.

Cantilever Signal Poles

The submission notes that a number of cantilever signal poles are proposed at location close to Protected Structures, ACAs and Candidate ACAs. DLRCC request that an Bord Pleanála include a condition requiring prior engagement and agreement regarding the necessity for, location and design of any proposed Cantilever Signal Poles.

Blackrock College

The submission notes that the protected dressed piers, plinth and railings and main entrance gates to Blackrock College are to be repositioned. The submission also notes that the demesne will be slightly reduced under the proposal. The submission notes that the mitigation measures and methodology as set out in the EIAR are deemed appropriate and requests an Bord Pleanála include a condition requiring prior engagement and agreement with DLRCC at detailed design stage for these works and including the proposed materials and surface treatments to be used at the main entrance and boundary of Blackrock College.

Age-Friendly County

The submission notes that DLRCC is an age-friendly county and requests that an Bord Pleanála include a condition requiring that public realm interventions are in accordance with Age Friendly Ireland Guidelines, Accessibility Guidelines and best practice requirements for such work.

Heritage

The submission requests that an Bord Pleanála include a condition requiring that public realm interventions, hard landscaping and street furniture are in accordance with the DLRCC County Heritage Plan 2021 – 2025.

Response to submission

Proposed Soft Landscaping

The planting strategy proposed is appropriate and will result in a coherent landscape, while also including a range of species which can react to the context of a specific area or place.

A number of species have been chosen for their suitability in coastal sites, including *Pinus sylvestris* (Scots pine) and *Crataegus monogyna* ‘*Stricta*’ (Hawthorn).

The Proposed Scheme has been designed with cognisance of minimising very small, landscaped areas, as the NTA is aware of the challenges in maintaining such areas. Notwithstanding this, in such constrained environments, even small green areas can be of significant value in providing attractive and healthy spaces for the local community, but also in providing better air quality, managing surface water run-off and in maintaining and creating habitats. The Proposed Scheme has appropriately balanced the need to provide appropriate levels of green space, while also minimising green spaces that are too small to effectively maintain.

All green areas have been considered for SuDS features where appropriate. The Landscaping General Arrangement drawings and the Proposed Surface Water Drainage Works Drawings identify areas where SuDS measures are proposed.

When preparing the Construction contract documents, the NTA will ensure that the appropriate establishment period is specified. The appointed Works Contractor will be required to ensure that all new planting is maintained following their installation until the conclusion of the establishment period.

All new planting has been located to ensure that it does not impede visibility of traffic signal heads at junction and pedestrian crossings.

Section 4.6.12.3.1 of Chapter 4 of EIAR Volume 2, Proposed Scheme Description outlines the planting strategy developed as part of the Proposed Scheme. The following is noted in this regard:

“The planting strategy has been developed to meet the needs of the Dún Laoghaire-Rathdown County Development Plan 2016-2022, the Dublin City Tree Strategy and the Dublin Biodiversity Action Plan as follows:

- *Where possible the initial conservation of existing biodiversity has been considered;*
- *Opportunities have been identified to enhance biodiversity through green infrastructure;*
- *Promote the role of street trees planting consistent with the recommendations of the Dún Laoghaire Rathdown County Development Plan 2016-2022 and Dublin City Tree Strategy; and*
- *Develop the role of SuDS opportunities within the Proposed Scheme to ideally reduce impervious areas for drainage management benefit.”*

Section 4.6.12.5 of Chapter 4 of EIAR Volume 2, Proposed Scheme Description outlines the typical planting typologies developed as part of the Proposed Scheme. In relation to new street trees the following is noted:

“As noted on the Landscaping General Arrangement (BCIDC-ARP-ENV_LA-1415_XX_00-DR-LL-9001) in Volume 3 of this EIAR, a range of urban street tree species (Image 4.19) have been incorporated into the design. The type of tree depends on the location and whether trees are to be planted in grass verges or in tree pits within paved urban environments as appropriate, and also to ensure diversity of species and provide habitats for urban wildlife. Typically, trees will be semi-mature and where appropriate, selected for having a clear stem height to facilitate visual permeability.”

In relation to New woodland / parkland areas and tree groups the following is noted:

“The Proposed Scheme corridor includes existing mature woodland / parkland, street trees and scrub areas, some of which will be impacted where the existing carriageway is to be widened or cycling infrastructure is to be provided. It is proposed to reinstate construction working areas and also to replant the edges of impacted areas to as to reinstate the streetscape or roadway character.

*Woodland / parkland tree planting will typically comprise bare-root native tree species including (Black Alder), *Salix aurita*, *Salix cinerea oleifolia*, *Salix caprea*, *Salix petrandra* (Willow sp.), *Betula pendula**

(Silver Birch), Pinus sylvestris (Scots Pine), Crataegus monogyna (Hawthorn), Quercus petraea (Sessile Oak) and Prunus spinosa (Blackthorn).

Elsewhere along the Proposed Scheme there are a range of existing mature and immature street trees. While it is proposed to retain and protect existing trees wherever possible, some will be impacted. The Proposed Scheme includes replacement and additional planting of semi-mature street trees to mitigate the loss of existing trees and to maintain the long-term tree-lined character of streets.

The Proposed Scheme incorporates additional landscaping arising from junction reconfiguration, reinforcement of existing vegetation areas, and the establishment of new urban realm and landscape opportunity areas. Tree species will be determined by location and will comprise of either native woodland / parkland trees as set out above. Landscaping proposals respond to the different localities and may include grass planting, hedgerows, trees, grasses, ornamental planting and swathes of bulbs.”

In relation to boundary planting the following is noted:

“The Proposed Scheme corridor is bounded by a wide range of established private, institutional, commercial and public land boundaries. While the design development has sought to avoid impacts on such boundaries, the Proposed Scheme will nonetheless require both temporary and permanent acquisition of lands.

Impacted property boundaries will be reinstated following construction. In some instances, boundaries will be rebuilt along their original alignments. In other cases, boundaries will be re-built on a new setback alignment. In general, property boundaries will be reinstated on a ‘like for like’ basis, including any walls, piers, fences, railings, gates, driveway finishes and private landscaping. Private grounds that are utilised in part for construction access will be reinstated following completion of the works to match the existing landscaping of the property. Where private grounds are reduced by permanent land take required for the scheme, the remaining grounds will be reinstated to match the landscape and character of the existing grounds in consultation with the property owner.”

Barclay Court

Existing trees are proposed to be retained on the western side of the access to Barclay Court. There is insufficient space to provide a new tree on this side of the access without removing existing trees in this location. As outlined in the Arboricultural Impact Assessment Report contained within Appendix A17.1, these trees are categorised as mature Lime and Hornbeam trees displaying overall good condition, and as such, the removal of these trees would not be in line with the objectives of the Proposed Scheme. The provision of new ornamental planting beneath existing trees along the Proposed Scheme is not within the remit of the Proposed Scheme.

Castledawson (Sion Hill) and Blackrock Park

As part of the design of the Proposed Scheme, new trees were considered in this location but ornamental planting is proposed in the green verges instead as there are trees already present within the existing landscaped area between the footpath and the boundary wall. It should also be noted that new trees are proposed within the solid median in the centre of the carriageway as per the Landscape General Arrangement Drawings in Volume 3 of the EIAR.

With respect to the proposed street trees on the Blackrock Park side of the road in this location, the proposed footpath width in this location is 2.0m which is considered sufficient to accommodate street trees while maintaining sufficient effective footpath width. It is noted that the footpath does not ‘kick in’ in this location, rather a new retaining wall is proposed along the section where the footpath appears to ‘kick out’. The proposed footpath width in this location will be a constant 2.0m wide.

Willow Terrace and Green Strip Adjacent to Blackrock Park

As part of the design of the Proposed Scheme, trees were considered near the entrance to Willow Park and one is proposed within ornamental planting in the green verges as per the Landscape General Arrangement Drawings in Volume 3 of the EIAR.

With respect to the proposed narrow strip adjacent to Blackrock Park, it was considered that this strip was too narrow to accommodate street trees.

Existing Landscaping including Landscaped Median on Temple Road

The NTA is aware that Temple Road/Frascati Road was recently upgraded by DLR as part of the Frascati Road/Temple Hill Route Improvement Scheme and as such the Proposed Scheme does not propose significant additional upgrades in this area, where not strictly necessary, to achieve the objectives of the Proposed Scheme. The landscaped median in this location has been designed in line with other soft landscaping proposal on this Section of the Proposed Scheme.

Proposed Hard Landscaping

The NTA has actively engaged with DLRCC during the design process of the Proposed Scheme and will continue to do so with respect to specific details (for example street furniture, Blackrock Park landings, Heritage, etc). The Proposed Scheme will not preclude any public realm schemes currently proposed by DLRCC.

The relocation of boundary walls will be discussed and agreed with the relevant landowner, including DLRCC as appropriate. Section 4.6.12.5.3 of EIAR Volume 2 Chapter 4 Proposed Scheme Description notes the following with respect to boundary treatments:

“Impacted property boundaries will be reinstated following construction. In some instances, boundaries will be rebuilt along their original alignments. In other cases, boundaries will be re-built on a new setback alignment. In general, property boundaries will be reinstated on a ‘like for like’ basis, including any walls, piers, fences, railings, gates, driveway finishes and private landscaping. Private grounds that are utilised in part for construction access will be reinstated following completion of the works to match the existing landscaping of the property. Where private grounds are reduced by permanent land take required for the scheme, the remaining grounds will be reinstated to match the landscape and character of the existing grounds in consultation with the property owner.”

Cantilever Signal Poles

The NTA understand the impacts that cantilever signal poles have on their environment, in particular in relation to visual impacts. As such, cantilever signal poles have only been proposed where absolutely necessary. The impacts associated with these signal poles have been assessed and considered as part of EIAR Volume 2, Chapter 15, Landscape (Townscape) & Visual.

Blackrock College

The NTA acknowledge and welcome the statement by DLRCC that the mitigation measures and the methodology as set out in the EIAR are deemed appropriate.

Age Friendly County

In line with best practice design principles the NTA has endeavoured to ensure that all designs included as part of the Proposed Scheme are age-friendly and cater for all abilities.

Heritage

The NTA has actively engaged with DLRCC during the design process of the Proposed Scheme and can continue to do so with respect to specific details (for example street furniture, Blackrock Park landings, Heritage, etc).

Section 4 – Environment and Biodiversity Recommendations

Overview of submission

Ecological Data

The submission notes that DLRCC's Biodiversity Officer holds ecological data sets on biodiversity within the county which DLRCC can share with An Bord Pleanála, should it be of use in the assessment of the planning application.

DLR Biodiversity Plan

The submission notes that a second DLR Biodiversity Plan has now been published – DLR Biodiversity Action Plan 2021 – 2025.

Invasive Alien Species

With respect to Section 12.4.3.1.1.4 of the EIAR, DLRCC's Biodiversity Officer requests that the presence of Japanese Knotweed in the vicinity of Booterstown Marsh and Blackrock Park be considered and addressed. It is further noted that any works in the vicinity of the Three-Cornered Garlic (leek) may cause the spread of seeds that are contained within the soil. The submission notes that it is unclear how this has been considered in the EIAR and IAS Management Plan and unclear what investigations have been carried out to ensure that any soil disturbance does not result in the spread of this invasive species.

DLR requests that the Board considers these issues as appropriate to ensure the effective control of invasive species.

Monitoring of Ecological Mitigation Measures

The submission notes that the EIAR Biodiversity chapter does not provide details of the monitoring of ecological mitigation measures and how the monitoring will be implemented. It is noted that monitoring in relation to landscape elements is proposed, but that this does not cover ecological monitoring. DLRCC requests that the Board require monitoring of mitigation measures by a suitably qualified ecologist for those mitigation measures that are related to potential significant impacts.

It is further noted that the NIS does not provide details of the monitoring of ecological mitigation measures outlined for both construction and operation phases and how these will be implemented. DLRCC requests that the Board requires that monitoring of mitigation measures is carried out for those mitigation measures that are related to potential significant impacts of the NIS and to ensure that clear and transparent monitoring details (carried out by a suitably qualified ecologist) are required.

Recommended Conditions

DLRCC lists a number of conditions which it requests the Board to include in relation to environmental management and biodiversity.

1. That a qualified ecologist be appointed, from the commencement of construction and for the duration of the implementation of mitigation measures.
2. That all mitigation measures relating to Biodiversity, be provided in a single Biodiversity Mitigation Plan document and will be implemented and recorded by a suitably qualified ecologist and reported directly to the Planning Authority.
3. That the programme for monitoring and implementation of mitigation measures both during construction and operation, be submitted by a suitably qualified ecologist, for agreement with the Planning Authority, 5 weeks prior to site works commencing.
4. Prior to commencement that the developer shall submit to the planning authority a letter from their ecologist, that they are satisfied that the final design of the external illumination proposed, is to the required specification recommended by a suitably experienced ecologist and that they are satisfied that biodiversity and landscape features for bats and other sensitive species are not illuminated.

5. Prior to commencement of development, that the developer shall submit a Final Landscape plane, which will be completed in consultation with the ecologist to include details of (but not exclusively):
 - a. Green/biodiverse roof on at least one of the bus shelters along the Proposed Scheme within DLRCC;
 - b. Planting enhancement;
 - c. Planting for pollinators and other invertebrates; and
 - d. Foraging areas for bats with consideration of the lighting plan.
6. Prior to commencement of development, that the developer shall submit a Habitat and Species Management Plan which will include a monitoring programme for habitats and species during construction and operation phases. DLRCC request that his will be provided for agreement with DLR's Biodiversity Officer.
7. That the developer shall submit a report from the ecologist after the installation of the external lighting, at the proposed development, confirming that it is operating according to specification.
8. That a detailed site-specific Final Construction and Environmental Management Plan (CEMP) will be submitted for agreement with the Planning authority at least 5 weeks prior to the commencement of the proposed works. The CEMP will include input from a suitably qualified ecologist and will include the following:
 - a. All of the mitigation and enhancement measures relating to biodiversity set out in the EIAR and NIS;
 - b. A detailed monitoring programme for agreement with the Planning Authority;
 - c. A suitably qualified project ecologist / ecological clerk of works will be retained to ensure that the necessary measures of the CEMP are implemented. Monitoring schedule and reporting will submitted for agreement with DLR's Biodiversity Officer;
 - d. The Management Plans for relevant IAS will be included in the CEMP;
 - e. The CEMP will include the details of the primary responsibilities of the Project Ecologist (PE) which are listed in the submission.
9. That the developer shall submit monitoring reports from their ecologist to the Planning Authority at intervals agreed with the Planning Authority, relating to measures included in the Ecological Impact Assessment report, the habitat and Species Management plan and CEMP and will confirm that the measure have been implemented according to specification. Actions required to be undertaken by the developed as a result of the recommendation of monitoring will be reported to the Planning Authority.

Response to submission

Ecological Data

The NTA notes the comment in this regard by DLRCC. The EIAR is robust in this regard and based on a sound and comprehensive ecological data set. It is a matter for An Bord Pleanála to determine whether the data referenced in the submission will assist in their determination.

DLR Biodiversity Plan

The NTA notes this comment from DLRCC. It is acknowledged that the DLRCC Biodiversity Action Plan 2009-2013 has now been superseded by the DLRCC Biodiversity Action Plan 2021-2025. The NTA has reviewed the DLRCC Biodiversity Action Plan 2021-2025 and note that there is no material alteration to the assessment contained in EIAR Volume 2 Chapter 12, Biodiversity due to the publishing of this new plan.

Invasive Alien Species

Section 12.2.3.3 or EIAR Volume 2, Chapter 12 Biodiversity, sets out the methodology followed in carrying out the baseline habitat survey. The following is noted:

“Habitat surveys were carried out by Scott Cawley between June and August 2018, and in August 2020 and October 2020 to capture design changes to the Proposed Scheme. All habitats located within or immediately adjacent to the Proposed Scheme footprint were surveyed and mapped to level three of the Heritage Council’s A Guide to Habitats in Ireland habitat codes, after Fossitt (Fossitt 2000) and in accordance with Best Practice Guidance for Habitat Survey and Mapping (Smith et al. 2011). The level of field data quality (as per Smith et al. 2011) was also recorded. Plant species present that were either representative of a habitat or considered to be of conservation interest (i.e., those listed on the Flora Protection Order or listed in the ‘threatened’ category or higher on the Ireland Red List No. 10 Vascular Plants (Wyse Jackson et al. 2016) and the Ireland Red List No. 8 Bryophytes (Lockhart et al. 2012)) were recorded, along with their relative abundances. Non-native invasive plant species listed on the Third Schedule of the (Birds and Natural Habitats) Regulations were also recorded. The habitat’s extent was mapped onto an aerial photograph, with Global Positioning System (GPS) points taken where a habitat’s extent could not be clearly identified from the aerial photograph. Vascular plant nomenclature follows that of the New Flora of the British Isles Fourth Edition (Stace 2019).”

These habitat species did not identify the presence of Japanese Knotweed in the vicinity of the Booterstown Marsh adjacent to the Proposed Scheme.

The presence of Three-cornered garlic (*Allium triquetrum*) has been identified near the viewing area located adjacent to the north-western corner of Booterstown Marsh. The location of this non-native invasive species is shown in Figure 2.52, which is an extract of Volume 2 – Figures: Part 2 of 2. The Proposed Scheme in this location does not consist of road widening, and all works will be contained within the existing boundary, separated from the Booterstown Marsh area by an existing wall.

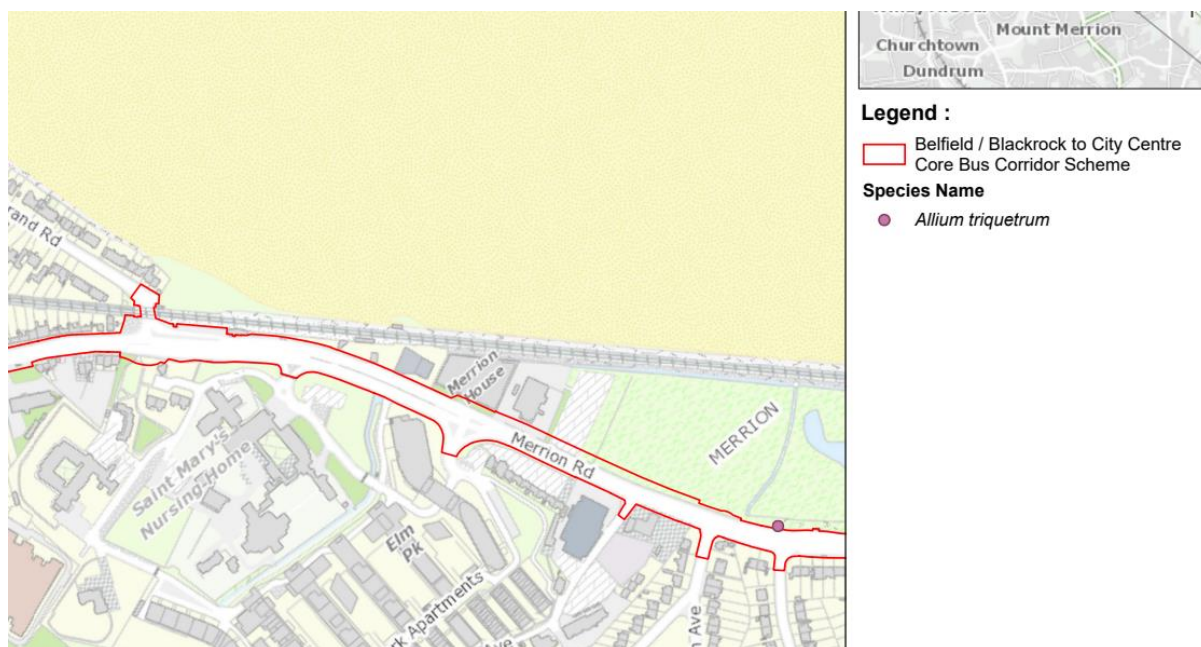


Figure 2.52: Extract from Figure 12.6 showing location of Three-Cornered Garlic

With regard to Non-Native Invasive Plant Species, the following is noted in Section 12.5.1.2.5 of Chapter 12:

“The NTA will ensure that a confirmatory pre-construction invasive species survey will be undertaken by a suitably qualified specialist to confirm the absence and/or extent of all Third Schedule invasive species within the footprint of the Proposed Scheme. Where an infestation is confirmed/identified, this

will require the implementation of a non-native Invasive Species Management Plan (refer to the Plan contained in the CEMP in Appendix A5.1 of Volume 4 of this EIAR).

Following the confirmatory pre-construction survey, the following mitigation measures will be implemented, as required.

- Where a pre-construction invasive species re-survey identifies newly established non-native invasive species within the footprint of the Proposed Scheme, the final non-native invasive species management plan produced will provide a detailed description of the infestations (e.g., approximate area of the respective colonies (m²), where feasible; approximate total number of stems, pattern of growth and information on other vegetation present), and where necessary, include calculations of volumes of infested soils to be excavated;
- The ISMP will be finalised following the pre-construction survey as advised by a suitably qualified specialist, with regard to the National Roads Authority (2010) Guidelines on the Management of Noxious Weeds and Non-native Invasive Plant Species on National Roads, and other species specific guidance documents including those listed in the draft ISMP, as necessary;
- The NTA will ensure that all control measures specified in the Proposed Scheme non-native ISMP shall be implemented by a suitably qualified and licenced specialist prior to the construction of the Proposed Scheme to control the spread of newly established non-native invasive species within the footprint of the Proposed Scheme. Furthermore, the appointed contractor will adhere to control measures specified within the ISMP throughout the Construction Phase of the Proposed Scheme;

The site will be monitored by the appointed contractor after control measures have been implemented. Any regrowth will be subsequently treated as detailed in the Proposed Scheme non-native ISMP.”

Monitoring of Ecological Mitigation Measures

Section 12.5.1 of the EIAR outlines the mitigation and monitoring measures to be implemented during the construction phase. These include the following monitoring measures:

- Section 12.5.1.2.2 Habitat Degradation – Surface Water Quality refers to the SWMP which includes the following:
 - The appointed contractor shall carry out visual monitoring of surface water control measures (settlement tanks, silt fences, fuel storage areas etc.) on a daily basis. In addition, weekly visual inspections of all of the water bodies crossed by the Proposed Scheme will be carried out by the appointed contractor, where it is possible to do so i.e. where the water body is not in culvert. For those water bodies in culvert, a weekly inspection of their outfall(s) to Dublin Bay will be carried out by the appointed contractor.
- Section 12.5.1.2.3 Habitat Degradation – Groundwater refers to the following:
 - Qualitative and quantitative monitoring will be adopted to ensure that the water is of sufficient quality to discharge. The use of silt traps will be adopted if the monitoring indicates the requirement for same, with no silt or contaminated water permitted to discharge to the receiving water environment.
- Section 12.5.1.2.5 Habitat Degradation – Non-native Invasive Plant Species, refers to the following:
 - The NTA will ensure that a confirmatory pre-construction invasive species survey will be undertaken by a suitably qualified specialist to confirm the absence and/or extent of all Third Schedule invasive species within the footprint of the Proposed Scheme.... The site will be monitored by the appointed contractor after control measures have

been implemented. Any re-growth will be subsequently treated as detailed in the Proposed Scheme non-native ISMP.

- *Section 12.5.1.4.1.1 Protection of Bats during Vegetation Clearance states the following:*
 - *A qualified arborist engaged by the appointed contractor will assess the condition of, and advise on any repair works necessary to, any trees which are to be retained or that lie outside of the Proposed Scheme footprint but whose RPA is impacted by the works;*
- *Section 12.5.1.4.2.1 Disturbance / Displacement states the following:*
 - *the NTA will ensure that a confirmatory pre-construction check of all suitable badger habitat will be completed within 12 months prior to any construction works commencing.*
- *Section 12.5.1.4.3.1 Loss of Breeding / Resting Sites states the following:*
 - *The NTA will ensure that a confirmatory pre-construction check of all suitable otter habitat will be completed within 12 months prior to any construction works commencing.*
- *Section 12.5.1.5.1.2 Mortality Risk (Birds) states the following:*
 - *Where the construction programme does not allow this seasonal restriction to be observed, then these areas will be inspected by a suitably qualified ecologist as engaged by the appointed contractor, for the presence of breeding birds prior to clearance. Areas found not to contain nests will be cleared within three days of the nest survey, otherwise repeat surveys will be required.*
- *Section 12.5.1.7.1 Mortality Risk (Amphibians) states the following:*
 - *If vegetation clearance works by the appointed contractor are to begin during the season where frogspawn or tadpoles may be present (i.e. February to mid-summer), or where breeding adult newts, their eggs or larvae may be present (i.e. mid-March to September), a pre-construction survey of suitable habitat will be undertaken by a suitably qualified ecologist engaged by the appointed contractor to determine whether breeding amphibians are present.*
- *In addition the following is proposed:*
 - *The appointed contractor will carry out annual post construction monitoring, over a two year period to ensure the successful re-establishment of vegetation within the Proposed Scheme.*

In line with legislative provisions, Dún Laoghaire-Rathdown County Council will revert to being the Road Authority following the completion of construction of the Belfield/Blackrock Core Bus Corridor Scheme.

Recommended Conditions

The NTA acknowledges the close liaison with DLRCC that has been in place during the planning and design stage of the Proposed Scheme. The Proposed Scheme as submitted to An Bord Pleanála has properly considered, and taken into account, the inputs from DLRCC during the design development process.

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

Section 5 – Drainage, Road Maintenance, Public Lighting and Pollution Control Recommendations

Overview of submission

Drainage Comments

SuDS

The submission advises that the requirements for SuDS should be thoroughly investigated to ensure that adequate space is provided and that utility checks are undertaken to confirm the feasibility of SuDS proposals. DLRCC note that they are happy to see areas that are currently paved being changed to landscaped areas, however that not all of these are being utilised for SuDS. The submission requests that this should be addressed where feasible.

Trees

The submission notes that a lot of new trees are proposed but it is not clear why all of these have not been specified as tree pits for surface water runoff. It is noted that redirecting existing footpaths/carriageways to these tree pits could aid in relieving any localised pluvial flooding and provide interception/treatment of this run-off for water quality improvement.

Hardstanding

The submission notes that it is unclear why all new hardstanding is not specified as permeable/porous surfacing. DLRCC state that this scheme presents an ideal opportunity to trial such surfaces in less trafficked areas such as proposed footpaths/cycle paths. It is noted that this would reduce the requirement for gully gratings in cycle paths, which themselves can be a hazard for cyclists, reducing surface water runoff and risk of icy surfaces in winter.

Existing Landscaped Areas

The submission notes that there appear to be some existing landscaped areas that could be altered as part of this scheme to provide bioretention basins, as an alternative or in addition to the oversized attenuation pipes referenced in the report, for surface water run-off, improving water quality, biodiversity and the public realm as a whole. The submission further notes that as alternation works are already proposed in the vicinity, it would be remiss of both the NTA and DLRCC not to take this opportunity to improve drainage and the public realm in this area.

Recommended Conditions

The DLRCC drainage department lists a number of recommended conditions which they request An Bord Pleanála to include in relation to Surface Water and Drainage.

1. Prior to the commencement of development, that the developer submit to the Planning Authority full details of the drainage proposals for the entire scheme. DLRCC note that these proposals must demonstrate SuDS potential has been maximised across the scheme. This should not be limited to proposed increase in hardstanding areas but provided across all sections of the scheme. It further notes that where possible, all trees should be specified as tree pits and bioretention areas incorporated where space is available, such as at junction. All proposed hardstanding areas must be permeable/porous and drain to an appropriately designed SuDS measure. DLRCC note that oversized pipes should not be considered SuDS measures.
2. Prior to the commencement of development, that the developer submit to the Planning Authority full dimensioned construction details of the proposed SuDS measures. DLRCC note that details shall include a construction plan and a post-construction maintenance specification and schedule. Contractors with specialist training in SuDS should be used.

Thereafter, works shall be carried out in accordance with the agreed details. The SuDS measures shall be designed in accordance with the SUDS Manual (C753).

3. Prior to the commencement of development, that the developer submit to the Planning Authority a construction management plan and programme of work that among other items provides for interception, containment and treatment of construction runoff. No construction runoff should be diverted to proposed SuDS measures. Any surface water sewer pipes used to convey construction runoff should be thoroughly cleaned before subsequent connection to SuDS elements.
4. If total infiltration of surface water run-off generated by the scheme is not possible then, prior to the commencement of development, the applicant is requested to submit a design with discharge rate for the scheme limited to Q_{bar} or 2l/s/ha, whichever is greater, subject to the orifice size of the flow control device not being less than 50mm in diameter. The submission shall include detailed calculations, including modelling results of the proposed system during all required storm events.

Road Maintenance Comments

The DLRCC road maintenance department lists a number of recommended conditions which they request An bord Pleanála to include.

- A pre and post PSCI survey shall be carried out by the developer for the access roads along the Core Bus Corridor with active monitoring of the road condition to include sufficient tie in road surface area and effective remediation measures to rectify any potential damage caused by construction traffic.
- That the developer shall submit for prior agreement with DLRCC, detailed design for all elements of the scheme including but not limited to footpaths, cycle lanes, kerb separators between modes, pavement treatment options, drainage details, tree pits etc.
- That the developer shall submit for prior agreement with DLRCC a detailed pavement treatment plan based on the PMS structural evaluation FWD Level 1 analysis and Level 2 report recommendations.
- That the developer shall submit for prior agreement with DLRCC, a detailed ironworks drawing to include the mastic requirement for the existing and new ironworks. Ironworks shall be reinstated with mastic surrounds in accordance with CC-PAV-04012 as follows:
 - Where they are in the wheel track of a lane,
 - Gullies in the vicinity of bus stops i.e., approximately 5 no. gullies on either side of a bus stop
 - Where existing ironworks are in poor condition; and
 - At any other location identified by the Resident Engineer.

Pollution Control Comments

The DLRCC pollution control section lists a number of recommended conditions which they request An bord Pleanála to include.

1. That the appointed contractor for the scheme shall engage with DLRCC's Pollution Control Section, in advance of construction works commencing, to agree the relevant details of the Construct Environmental Management Plan and the Surface Water Management Plan in relation to the construction compound.

The DLRCC pollution control section further notes that no petrol interceptors appear to be included in the proposals.

Public Lighting Comments

DLRCC's public lighting department note that street lighting along DLRCC's section of the CBC corridor has all been upgraded to LED lighting in recent years and note that the columns and brackets are in good condition. It is noted that the addition of trees will have to take account of those light locations and ensure that the light levels on the road and footpath surface are not negatively impacted, It is noted that any alteration of the light column locations should be done under a complete lighting design.

Response to submission

Drainage Comments

SuDS

The NTA notes the comment from DLRCC's drainage department that they are happy to see currently impermeable areas being converted to permeable areas as part of the Proposed Scheme. As set out in section 4.6.15.4 of EIAR Volume 2 Chapter 4, Proposed Scheme Description, SuDS features have been proposed where practicable. The following is noted:

"Flows will be controlled by the implementation of SuDS techniques, where practicable. One of the principal objectives of the road drainage system is to minimise the impact of the runoff from the roadways on the surrounding environment via the position of: filter drains, swales, bio-retention areas, tree pits, oversized pipes, silt traps and attenuation features if necessary."

Proposed SuDS features have been assessed to ensure that sufficient space is allowed for them, and utility checks have been carried out against available utility record information. The following I noted in Section 4.6.45.5 of the EIAR:

"Infiltration rates were assumed to be zero for calculating the required attenuation volumes for SuDS measures. This is a conservative approach and ensures SuDS measures are not knowingly undersized at this stage of the design. Where necessary, permeability tests will be completed so that infiltration rates can be considered in further design."

Trees

It is noted in Section 4.16.15.5 of EIAR Volume 2, Chapter 4 Proposed Scheme Description that:

"A SuDS drainage strategy has been developed for all newly paved areas in accordance with the SuDS hierarchy. SuDS are provided to ensure no increase on existing runoff rates from new paved areas will also provide a level of treatment before discharging into the existing network system."

As such, tree pits are proposed in locations where new street trees are proposed in the vicinity of newly paved areas. It is further noted that where trees are proposed in landscaped areas such as verges or similar, tree pits are not proposed.

Hardstanding

Permeable paving was considered as an option for paved surfaces in some specific location but wasn't pursued further.

Existing Landscaped Areas

As noted in the response to the specific query on trees above it is noted in Section 4.16.15.5 of EIAR Volume 2, Chapter 4 Proposed Scheme Description that:

"A SuDS drainage strategy has been developed for all newly paved areas in accordance with the SuDS hierarchy. SuDS are provided to ensure no increase on existing runoff rates from new paved areas will also provide a level of treatment before discharging into the existing network system."

As such the conversion of existing landscaped areas into bioretention basins does not form part of the scope of the Proposed Scheme.

Response to Recommended Conditions

1. The NTA acknowledges the close liaison with DLRCC that has been in place during the planning and design stage of the Proposed Scheme. The Proposed Scheme as submitted to An Bord Pleanála has properly considered, and taken into account, the inputs from that DLRCC during the design development process.

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

2. Please refer to the response to proposed DLRCC Drainage Department Condition 1 above.
3. A Construction Environmental Management Plan (CEMP) has been submitted as Appendix A5.1 of EIAR Volume 4. This Construction Environmental Management Plan includes a Surface Water Management Plan which outlines how surface water shall be managed during the construction stage of the Proposed Scheme. These are matters that can be successfully addressed between DLRCC and the NTA, in the absence of any approval condition.
4. As set out in section 13.4.1.1 of EIAR Volume 2 Chapter 13 Water:

“The drainage design is based on a number of general principles, which are set out in the document ‘BusConnects Core Bus Corridor Drainage Design Basis’ (NTA 2020). A SuDS drainage design has been developed as a first preference and in accordance with the SuDS Management Train described in the CIRIA SuDS manual (CIRIA 2015). The CIRIA SuDS Manual recommends that when considering SuDS solutions, the preferred approach is a hierarchy whereby runoff using source control solutions (e.g. pervious surfacing) are considered first. Where source control is not possible or cannot fully address an increase in runoff from a development, residual flows are then managed using site controls (e.g. bioretention / infiltration basins). If this is not practical or residual flows remain above existing runoff rates, regional controls (e.g., oversized pipes) are used. SuDS provide the dual benefits of controlling flow and treating water quality.

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

The Proposed Scheme primarily involves the reallocation of existing road space. Where additional impermeable areas are proposed, a SuDS strategy has been developed to ensure that there will be no increase in existing runoff rates. This is the appropriate surface water management strategy for the Proposed Scheme.

Road Maintenance Comments

1. Section 5.2 of the Construction Environmental Management Plan (CEMP) included in EIAR Volume 4 Appendix A5.1, contains the Construction Traffic Management Plan. Section 5.2.3.14 of this document outlines the measures to be carried out by the appointed contractor to ensure that the road condition is not negatively impacted by construction activities. The following is noted:

“The extent of the lorry traffic movements and the nature of the payload may create problems of:

- *Fugitive losses from wheels, trailers, or tailgates; and*
- *Localised areas of subgrade and wearing surface failure.*

Activities which may reduce the impact on road condition are outlined below. They should be incorporated into the CTMP by the appointed contractor where practicable;

- i. Loads of materials leaving each works area will be evaluated and covered if considered necessary to minimise potential dust impacts during transportation;*
- ii. Take all reasonable measures while transporting waste or any other materials likely to cause fugitive losses from a vehicle during transportation to and from the works areas, including but not limited to;

 - a. Covering of all waste or material with suitably secured tarpaulin / covers to prevent loss; and*
 - b. Utilisation of enclosed units to prevent loss.**
- iii. Undertake pavement condition surveys along roads forming part of the construction traffic route, based on consultation with the NTA and professional judgement regarding the condition of the route pre-construction. These record the baseline structural condition of the road being surveyed immediately prior to construction; and*
- iv. Throughout the course of construction of the Proposed Scheme, undertake on-going visual inspections and monitoring of the construction traffic routes to ensure any damage caused by construction traffic is recorded. Arrangements can then be made to repair any such damage to an appropriate standard in a timely manner such that any disruption is minimised.*

Upon completion of construction of the Proposed Scheme, the surveys carried out pre-construction shall be repeated, and a comparison of the pre-construction and post-construction surveys carried out.”

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

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

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

3. Please refer to the response to proposed DLRCC Road Maintenance Department Condition 2 above.

4. Please refer to the response to proposed DLRCC Road Maintenance Department Condition 2 above.

Pollution Control Comments

The NTA has included a comprehensive Construction Environmental Management Plan (CEMP) including a Surface Water Management Plan within EIAR Volume 4 Appendix A5.1. The Proposed Scheme as submitted to An Bord Pleanála has properly considered, and taken into account, the inputs from the pollution control department during the design development process, including in relation to the CEMP and the Surface Water Management Plant in relation to the construction compound as referenced in this requested condition.

The NTA notes the comment by DLRCC in relation to the fact that no petrol interceptors appear to be included in the proposals. For areas where no increase in impermeable area is proposed the proposed drainage strategy is to utilise the existing drainage regime with the relocation of existing gullies where practicable. A SuDS drainage strategy has been developed for all newly paved areas in accordance with the SuDS hierarchy. SuDS are provided to ensure no increase on existing runoff rates from new paved areas will also provide a level of treatment before discharging into the existing network system.

Public Lighting Comments

The NTA notes the comments from DLRCC in this regard. As outlined in Section 4.6.13 of EIAR Volume 2 Chapter 4 Proposed Scheme Description:

“Light Emitting Diode (LED) lanterns will be the light source for any new or relocated public lighting provided. The lighting design will involve works on functional, heritage and contemporary lighting installations on a broad spectrum of lighting infrastructure along the Proposed Scheme. This will include, but not exclusively, luminaires supplied by underground and overhead cable installations and those located on ESB infrastructure.”

Proposed relocation of light column locations and new lighting column locations have been coordinated with existing and proposed tree locations to ensure no adverse effect on the light levels to road and footpath surfaces.

2.4.3 42 – Brendan Heneghan

Overview of Submission

The submission raised the following issues:

Consultation Process - Aarhus Convention / Kazakhstan Advice;

Access issues in Elgin Road area;

Continue to use existing 7 and 39A routes rather than Pembroke Road and Nutley Lane;

Extra traffic in local streets;

Bus gates during prescribed hours; and

Moving bus stops.

Consultation Process - Aarhus Convention / Kazakhstan Advice

Summary of issue

The submission considers that the consultation on the Proposed Scheme was inadequate at all stages of the development of the proposal and that the NTA largely ignored the principles of the

Aarhus Convention on effective public participation. It also expresses the view that no opportunity was afforded to those who are not computer literate (by a toll free number) to participate in any aspect of Phase 2 or Phase 3, which is in breach of paragraph 49 and 50 of the Kazakhstan Advice. It goes on to cite other potential breaches under paragraphs 29, 33, 38, 45, 46, 23, 26, 34 and 57 of the Kazakhstan Advice. It makes the request that a further consultation is undertaken with Kazakhstan principles being observed.

Response to issue

Ireland ratified the Aarhus Convention in June 2012 and it entered into force in Ireland in September 2012. Prior to that ratification, Ireland had to ensure that all the provisions of the Convention were implemented in national law, which took a number of years, and involved over 60 pieces of legislation.

Accordingly, Ireland's obligations under the Aarhus Convention have been fully incorporated into Irish legislation and include rights of access to information on the environment, rights of participation in planning determinations, rights of access to adequate review procedures and various other rights.

These are now statutory provisions, which are binding on all applicable parties.

In relation to transport infrastructure projects, the applicable statutory provisions are set out in the relevant planning and transport legislation, which include requiring major projects to seek planning consent from An Bord Pleanála. Those application processes for large infrastructure schemes provide for a statutory process requiring the making available for public review all of the applicable information set out in the legislation, and permitting the making of submissions in relation to the proposals to the determining body, being An Bord Pleanála.

Thereafter, the legislation provides for the holding of an Oral Hearing, enabling direct public engagement and participation in the decision making process.

It should be noted that the advice sought by the Republic of Kazakhstan from the Aarhus Convention Compliance Committee related to the holding of "public hearings". The term "public hearing" is the equivalent of the "Oral Hearing" process conducted by An Bord Pleanála here in Ireland. This Oral Hearing arrangement is part of the statutory process set out in Irish legislation in fulfilment of its obligations under the Aarhus Convention.

In relation to the three phases of non-statutory consultation referred to in the submission, at that time the Proposed Scheme had not yet progressed to the stage of a planning application to An Bord Pleanála. Instead, the Proposed Scheme was still at the stage of considering various scheme options before finalising a proposal that would then be brought forward for consideration of development consent. As part of the scheme development stage, various non-statutory public consultation processes have been undertaken. These processes are in excess of the requirements of the Aarhus Convention, whose obligations are already enshrined in Irish legislation including "statutory public consultations" which is the stage that the project has now reached.

While, as mentioned above, the Kazakhstan Advice does not apply to the non-statutory public consultation, every effort was made by the NTA to facilitate public participation and engagement during government restrictions relating to the Covid-19 pandemic. A second round of non-statutory public consultation was launched on 4 March 2020 but shortly thereafter due to the Covid-19 pandemic and the various government restrictions, all events forming part of this second round of non-statutory public consultation scheduled after 12 March 2020 were cancelled. However, as the NTA had already received some written submissions by that date, the decision was made not to close the consultation entirely but instead to allow written submissions to continue to be made up until 17 April 2020 which was the original deadline for such submissions.

To further facilitate public engagement and participation, a third round of non-statutory public consultation took place from 4 November 2020 to 16 December 2020. With the continuing effect of the Covid-19 pandemic and associated government restrictions, the third round of non-statutory public consultation was held largely virtually.

Access issues in Elgin Road area

Summary of issue

The submission notes that the proposals to restrict general traffic at Elgin Road, as well as at the proposed bus gate at Eastmoreland Place on Pembroke Road will have impacts on access to Wellington Road, Raglan Road and other surrounding roads. The submission notes that residents will largely have access from Morehampton Road. The submission states that the author does not believe that local residents are necessarily aware of these impacts due to the significant body of material submitted. The submission further states that the restriction of general traffic should not be permitted unless An Bord Pleanála are satisfied that residents have no issue and that all traffic exiting onto Morehampton Road has no impact in that location.

Response to issue

Volume 1 of the EIAR comprises the Non-Technical Summary of the EIAR for the Proposed Scheme. Section 6 the Non-Technical Summary provides an overview of the description of the Proposed Scheme. General Arrangement drawings are also provided as part of the Non-Technical Summary.

EIAR Volume 2 Chapter 4, Proposed Scheme Description, provides full details of the proposed works for all the various component elements of the Proposed Scheme, including proposed restriction to traffic movements. The Non-Technical Summary provides a very clear indication of what works are to be carried out and Chapter 4, together with the Chapter 4 Figures in Volume 3, provide clear and detailed information of all aspects of the proposed works, including those outlined above. Furthermore, there has been extensive non-statutory public consultation of the Proposed Scheme to date, which has included details of the proposed traffic management measures.

As such, the NTA firmly believes that all reasonable efforts have been made to make any persons potentially impacted by the proposed scheme, aware of these potential impacts.

In relation to potential impacts arising from these proposals, as set out in EIAR Chapter 6 Traffic and Transport, Section 6.4.6.2.8 General Traffic Assessment, the transport modelling undertaken for the assessment of the Proposed Scheme has considered the potential for traffic redistribution impacts resulting from the Proposed Scheme measures. This identifies potential decreases as well as increases in traffic flows on some road links in the study area as a result of the Proposed Scheme, due to the reallocation and rebalancing of road space in favour of sustainable modes (Walking, Cycling and Public Transport).

To determine the impact that the Proposed Scheme has in terms of an increase in general traffic flows on the direct and indirect study areas, a robust assessment has been undertaken, with reference to TII's "Traffic and Transport Assessment Guidelines (May 2014)". Each road link that is predicted, through the modelling, to experience an increase in 2-way flows of more than 100 passenger car units has been subjected to further assessment to assess the significance of effects in relation to the traffic flow changes on these links.

Section 6.4.6.2.8.5 General Traffic Impact Assessment of Chapter 6 outlines the 3-step assessment process that has been undertaken to assess the impact and significance of effect at each junction along the identified links that are predicted to experience traffic flow increases. Tables 6.52 to 6.55 outline the results of this assessment which shows that the majority of assessed junctions have V / C ratios of below 85%, i.e. they are operating within capacity for all assessed years in the Do Minimum and Do Something scenarios (i.e. with and without the Proposed Scheme). The assessment indicates that these junctions will be able to accommodate any changes in traffic volumes, as a result of the Proposed Scheme. The effects at each junction are predominantly deemed to be Imperceptible to Not Significant and Long-term. Given that the redistributed traffic will not lead to a significant deterioration of the operational capacity on the surrounding road network, no additional mitigation measures, beyond what is included already in the design, have been considered.

In relation to Morehampton Road, the assessment has considered the Leeson Street Upper / Wellington Place / Morehampton Road junction and determined that the Proposed Scheme will have

a Negative, Moderate and long term effect on this junction. Considering the wider effects of the Proposed Scheme, across the study area as a whole, it is determined that there will be an overall Negative, Slight and Long-term effect from the redistribution of general traffic as a result of the Proposed Scheme. This impact is considered acceptable in line with the Proposed Scheme objectives and the considerable improvements and priority provided for sustainable modes along the Proposed Scheme.

The traffic congestion outlined in the impact assessment is considered acceptable when considering the urban location of the area and in the context of the increased movement of people overall and by sustainable modes along the Proposed Scheme.

Continue to use existing 7 and 39A routes rather than Pembroke Road and Nutley Lane

Summary of issue

The submission starts by noting that these comments are made without knowledge of the views of affected residents on Pembroke Road and adjacent streets, and on Nutley Lane. The author notes that if the residents are happy with what is proposed then they are probably ok with it too. The submission notes that the current number 7 and number 4 bus routes proceed to the city centre via Northumberland Road and Lower Mount Street. The submission notes that the route now proposed via Pembroke Road is somewhat longer and will cause disruption along the route. It is noted that the new route runs on a section of Lower Fitzwilliam Street that is part of the golden mile and is a particularly important heritage area. The submission notes that there is already bus lane infrastructure on the Northumberland Road and Lower Mount Street corridor and submits that this should be the route of the Proposed Scheme. The submission contends that the reasons for dismissing this in the options report are difficult to understand.

It is further noted that the current 39A route proceeds to the city centre via Donnybrook on what is to be the E spine. The author asserts that this route should continue to be used, and that Nutley Lane should not be utilised as an important bus route.

Response to issue

Chapter 3 of the EIAR, Consideration of Reasonable Alternatives, outlines the Options Assessment process in determining the Preferred Route Option. The Dún Laoghaire to City Centre scheme was divided into three sub-sections for further assessment and refinement (see Figure 2.53). As noted the third section, SAS3 was included in the original assessment but subsequently removed from the Proposed Scheme.

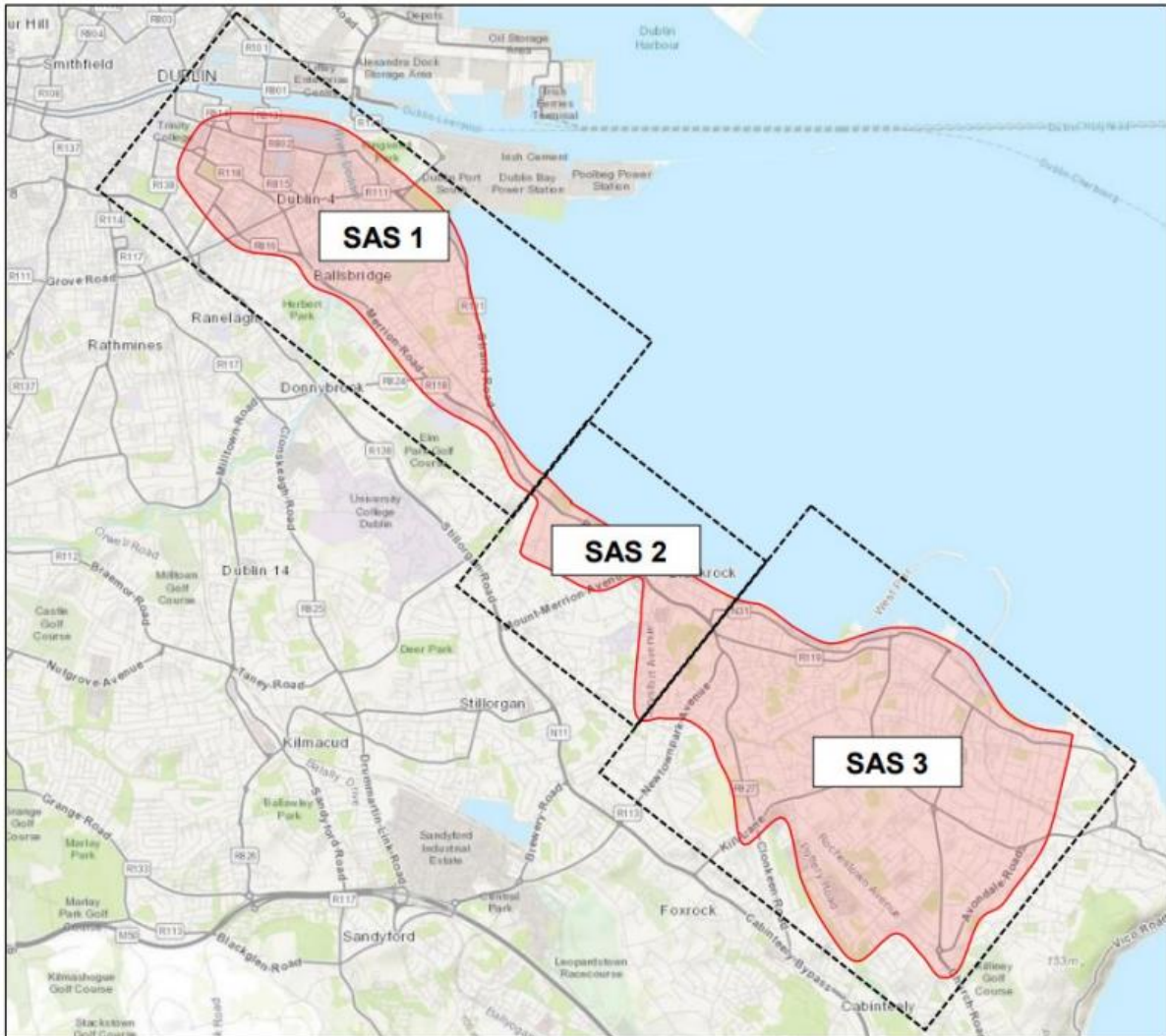


Figure 2.53: Stage 2 Route options sub-section division extracted from ‘Dún Laoghaire to City Centre Core Bus Corridor Options Study – Feasibility and Options Assessment’

In relation to sub-section SAS1, following the Stage 1 sifting process, two viable route options for sub-section SAS1, were taken forward for assessment and further refinement:

- Route Option N1: A route option via Merrion Road, Pembroke Road and Baggot Street Lower; and
- Route Option N2: A route option via Merrion Road, Northumberland Road and Merrion Square North.

These routes are presented in Figure 2.54.

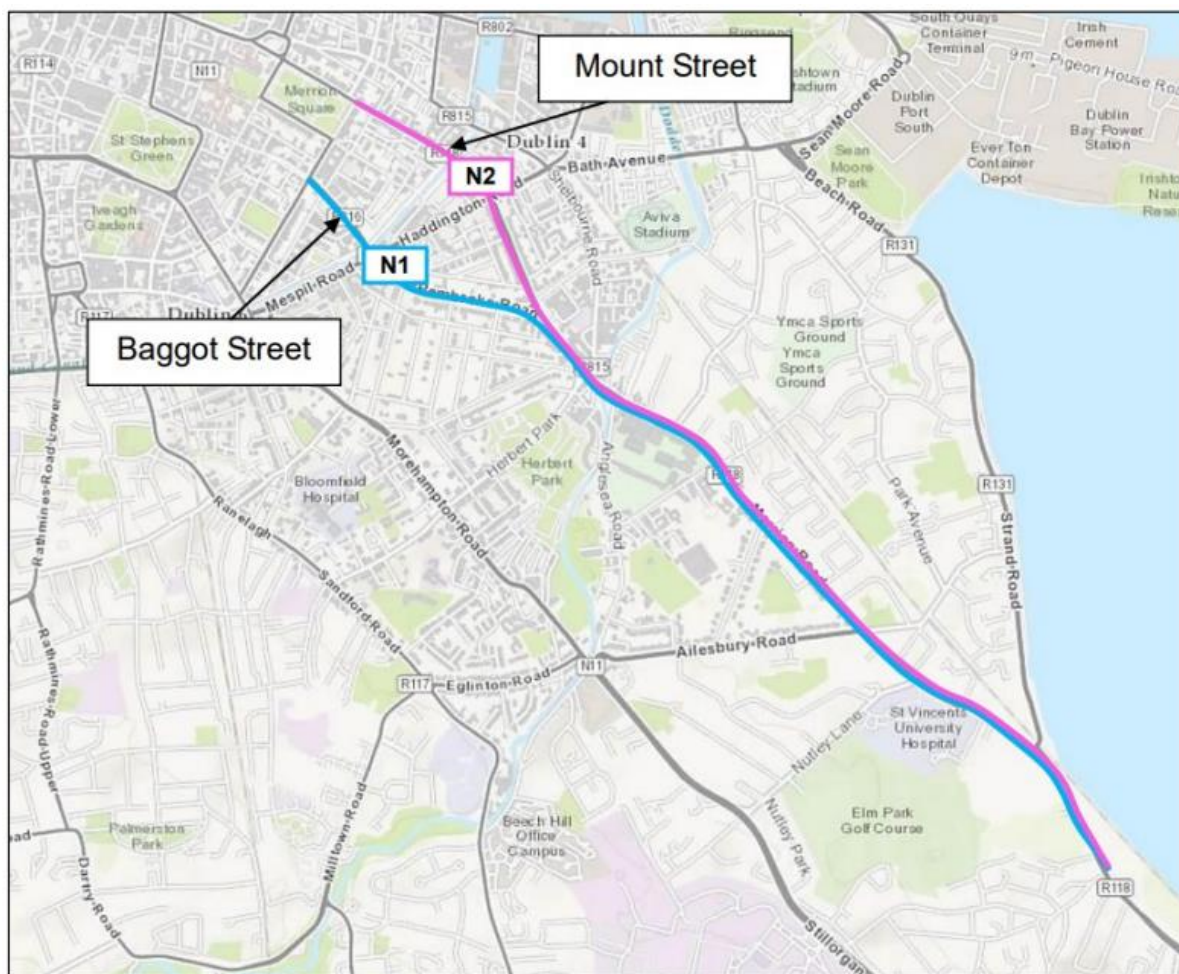


Figure 2.54: Sub-section SAS1 Route Options extracted from ‘Dún Laoghaire to City Centre Core Bus Corridor Options Study – Feasibility and Options Assessment’

Two scheme options were considered along each route which would provide traffic lanes, bus lanes and cycle tracks in each direction. The primary difference between these scheme options was the treatment at the junctions (Option 2 of each route required buses to share with left-turning traffic at junctions). The assessment sub-criteria which were differentiators between scheme options included Capital Cost, Transport Reliability and Quality, Residential Population and Employment Catchments, Traffic Network Integration and Land Use Character. Route N1 Option 2 was identified as having significant benefits over other options in relation to both Capital Cost and Land Use Character. Following a detailed MCA, route N1 Option 2 was identified as the preferred option for this section and was brought forward into the Emerging Preferred Route.

As mentioned previously each route option was evaluated using a multi-criteria assessment with one of the primary criteria being ‘Environment’, under which there was a number of sub-criteria which each route option was considered against comparatively.

In terms of potential Archaeological, Cultural Heritage and Architectural Heritage impacts, it was considered that all four route options were considered neutral when compared against one another given the largely equivalent number of recorded monuments and protected structures directly affected or in close proximity.

With regard to Flora and Fauna, it was considered that all four route options were considered neutral when compared against one another given the largely equivalent number of trees likely to be removed in each option.

All four route options were considered neutral when compared against one another under the Soils and Geology sub-criterion, given none presented any appreciable impacts.

All four route options were considered neutral when compared against one another under the Hydrology sub-criterion, given none presented any appreciable impacts.

With regard to Landscape and Visual, it was considered that all four route options were considered neutral when compared against one another given the largely equivalent level of road widening and impact on tree lines in each option.

With regard to Air Quality, it was considered that all four route options were considered neutral when compared against one another given that in each option there is already existing vehicular and bus traffic, and each would have an equivalent level of road widening.

When the options were considered under the Land Use Character sub-criteria, Route Options 3 and 4 (via Northumberland Road) were considered to have some disadvantages when compared to Route Options 1 and 2 (via Pembroke Road), with Route Option 2 presenting further advantages over Option 1. In all four options a large number of trees and on-street parking provision was expected to be affected, however to a greater extent on Route Options 3 and 4 on Northumberland Road, with the lowest impact being under Route Option 2. Route Option 2 was therefore considered to have advantages given the lower impact on existing land use character.

Route Option 2 was identified as the preferred option for this section. With regard to the consideration of the Environment criterion, Route Option 2 was considered to have some advantages when compared to the other options due to the reduced impact on Land Use Character. Route Option 2 was therefore brought forward into the Emerging Preferred Route. This option was subsequently confirmed as the Preferred Route Option for this section of the Proposed Scheme.

In relation to the routing of the Proposed Scheme along Nutley Lane, Section 2.2.1.3 of Chapter 2 of the EIAR, Need for the Proposed Scheme, outlines the need for the Nutley Lane link as part of the cycle network. This section notes that the Greater Dublin Area (GDA) Cycle Network Plan was adopted by the NTA in early 2014, following a period of consultation with the public and various stakeholders. This plan forms the strategy for the implementation of a high quality, integrated cycle network as set out in the GDA Transport Strategy. Paragraph four of Section 2.2.1.3 notes that there are two primary cycle routes (Cycle Route 13 and Cycle Route 13A) identified running along the majority of the Proposed Scheme, as well as Secondary Cycle Routes on Nutley Lane (S04) and Fitzwilliam Street (C7).

Section 2.2.1.6 of Chapter 2 of the EIAR, Need for the Proposed Scheme, outlines the need for the Nutley Lane link as part of the Core Bus Corridor Infrastructure Works. It notes the following in paragraph 6:

'Across the Core Bus Network, the corridors are generally proposed along established radial corridors into and out of the city. However, in developing the Core Bus Network a significant demand was identified for travel between UCD and Ballsbridge. It is for this reason that Core Bus Network proposed a route connecting the radial corridors on which these destinations lie, namely the "Bray – UCD – Donnybrook" corridor and the "Dún Laoghaire to City Centre" corridor.'

The Proposed Scheme connecting Belfield and Blackrock to the City Centre serves a significant public transport demand between these locations.'

Extra traffic in local streets

Summary of issue

The submission notes that the scheme identifies a number of roads which may face significant extra traffic should the scheme be permitted. The submission notes that it is difficult to understand why a scheme which is not really taking away a significant amount of road space on the Merrion Road and is supposed to divert car passengers to bus can have this effect.

The submission goes on to refer to Paragraph 6.4.6.2.8 in the Traffic and Transport Chapter of the EIAR, which the submission claims is very difficult to follow, and which the submission asserts, seems to breach transparency norms. The submission request clarity as to whether the modelling includes the effect of the Bray Corridor. The submission goes on to list a number of residential roads which will experience additional traffic and notes that the scheme should not be permitted unless residents have been made aware of these impacts, and their views taken into account.

Response to issue

As set out in EIAR Chapter 6 Traffic and Transport, Section 6.4.6.2.8 General Traffic Assessment, the transport modelling undertaken for the assessment of the Proposed Scheme has considered the potential for traffic redistribution impacts resulting from the Proposed Scheme measures. This identifies potential decreases as well as increases in traffic flows on some road links in the study area as a result of the Proposed Scheme, due to the reallocation and rebalancing of road space in favour of sustainable modes (Walking, Cycling and Public Transport).

To determine the impact that the Proposed Scheme has in terms of an increase in general traffic flows on the direct and indirect study areas, a robust assessment has been undertaken, with reference to TII's "Traffic and Transport Assessment Guidelines (May 2014)". Each road link that is predicted, through the modelling, to experience an increase in 2-way flows of more than 100 passenger car units has been subjected to further assessment to assess the significance of effects in relation to the traffic flow changes on these links.

Section 6.4.6.2.8.5 General Traffic Impact Assessment of Chapter 6 outlines the 3-step assessment process that has been undertaken to assess the impact and significance of effect at each junction along the identified links that are predicted to experience traffic flow increases. Tables 6.75 to 6.78 outline the results of this assessment which shows that the majority of assessed junctions have V / C ratios of below 85%, i.e. they are operating within capacity for all assessed years in the Do Minimum and Do Something scenarios (i.e. with and without the Proposed Scheme). The assessment indicates that these junctions will be able to accommodate any changes in traffic volumes, as a result of the Proposed Scheme. The effects at each junction are predominantly deemed to be Imperceptible to Not Significant and Long-term. Given that the redistributed traffic will not lead to a significant deterioration of the operational capacity on the surrounding road network, no additional mitigation measures, beyond what is included already in the design, have been considered.

Accordingly, across the study area as a whole, it is determined that there will be an overall Negative, Slight and Long-term effect from the redistribution of general traffic as a result of the Proposed Scheme. This impact is considered acceptable in line with the Proposed Scheme objectives and the considerable improvements and priority provided for sustainable modes along the Proposed Scheme.

The traffic congestion outlined in the impact assessment is considered acceptable when considering the urban location of the area and in the context of the increased movement of people overall and by sustainable modes along the Proposed Scheme.

In respect of the cumulative effect of the Bray to City Centre CBC Scheme, the assessment presented in EIAR Chapter 6 Traffic and Transport is based on the Proposed Scheme only. Consideration of cumulative impacts with other proposed projects is included in EIAR Chapter 21 Cumulative Impacts and Environmental Interactions.

Section 21.2.7 of Chapter 21 sets out that for the operational cumulative effects including the Proposed Scheme, the assessment has been undertaken based on a scenario where all the other 11 Core Bus Corridor schemes are also operational. It is the NTA's intention that all BusConnects Core Bus Corridor schemes would be completed by 2028, therefore the scenario is considered to be reasonable. In addition, it is the largest scale option and therefore represents a reasonable worst case for operational effects in terms of redistribution of traffic and traffic related effects.

The Do Minimum scenarios (in both 2028 and 2043) include all other elements of the BusConnects Programme (apart from the Core Bus Corridor Infrastructure Works elements) i.e. the new BusConnects routes and services (as part of the revised Dublin Area bus network), new bus fleet, the Next Generation Ticketing and integrated fare structure proposals are included in the Do Minimum scenarios. In 2028, other notable Do Minimum transport schemes include; the roll out of the DART+ Programme, Luas Green Line capacity enhancement and the Greater Dublin Area Cycle Network Plan implementation (excluding BusConnects Core Bus Corridor elements). As outlined above, the 2043 Do Minimum scenario assumes the full implementation of the GDA Strategy schemes and so assumes that proposed major transport schemes such as MetroLink, DART+ Tunnel, Luas line extensions to Lucan, Finglas and Bray are all fully operational. Chapter 6 Appendix A6.2 Transport Modelling Report in Volume 4 of the EIAR, provides further information on the modelling assumptions contained within the Do Minimum scenario including the full list of transport schemes included.

Bus gates during prescribed hours

Summary of issue

The submission states that they think it is appalling that the bus gate hours of operation are not set out in the description of the scheme at paragraph 5.4.5.1.2. The submission notes that the applicant has been evasive on this issue on other corridors. The submission further notes that a bus gate operating 6am to 10am city bound and 3:30pm to 7pm Monday to Friday at this location is a vastly different proposal as opposed to a 24/7 timescale 365 days a year.

Response to issue

The NTA note the comment in relation to the hours of operation of the proposed bus gate. Sheet 19 of the General Arrangement Drawings clearly note that the bus gate is proposed to operate between the hours of 06:00 and 20:00 from Monday to Sunday, in both directions.

Moving bus stops

Summary of issue

The submission notes that there are a large number of bus stops which are proposed to be relocated, and that there should have been a site notice placed at each location where a bus stop is proposed to be relocated due to the impact that this will have on its users

Response to issue

All the required statutory notices were issued for the application for the Proposed Scheme and the CPO. Non-statutory site notices relating to the CPO were erected at a total of 29 locations along the route of the Proposed Scheme, supplementing the statutory notices for the CPO.

2.4.4 29 – Dublin Commuter Coalition

Overview of submission

This submission raised the following issues:

- i) Advocate for the Proposed Scheme;
- ii) Enforcement;
- iii) Junction Design;
- iv) Pedestrian Crossings;
- v) Shared Space;
- vi) Bus Stop Design;

- vii) Bus Stop Locations;
- viii) Parking Spaces;
- ix) Nutley Lane;
- x) Minor Junctions;
- xi) Yellow Boxes

Advocate for the Proposed Scheme

Summary of issue

The submission sets out that the Dublin Commuter Coalition is a voluntary advocacy group for public transport users, cyclists, and pedestrians in Dublin and surrounding counties. The submission notes that the Dublin Commuter Coalition has been engaging with the NTA over the last three years and they believe the project will be a catalyst for greater usage of public transport and active travel.

Response to issue

The NTA recognises the benefit of the continued engagement with the Dublin Commuter Coalition and other advocacy groups through the three rounds of non-statutory public consultation, community forums and one to one meetings in developing the Proposed Scheme. The NTA welcomes the support from the advocacy group for the Proposed Scheme. Requests to modify particular detailed design aspects of the Proposed Scheme are noted and the NTA provides responses to those requests as set out in the following sections. The NTA looks forward to continuing to collaborate with the Dublin Commuter Coalition in achieving the Proposed Scheme objectives which have many synergies with the Dublin Commuter Coalition members vision in creating a Dublin that works for all users of sustainable transport.

Enforcement

Summary of issue

The submission has outlined its views in relation to the importance of enforcement for lawful use of bus lanes such that the benefits of the Proposed Scheme will be realised by passengers. The submission notes in particular the removal of the right turn for vehicular traffic onto Shelbourne Road. The submission notes that this is a well-used junction for vehicular traffic and notes its concern that the removal of this right turn will result in a large number of illegal turns to avoid the oncoming bus gate at Baggot Street. The submission notes that there is enough room at this junction to retain a right turn filter lane at this location, or alternatively Gardai or traffic camera enforcement will be required.

Response to issue

The NTA acknowledges the comments raised in relation to camera enforcement. Whilst enforcement for the lawful use of bus lanes is currently a matter for An Garda Síochána the NTA is separately exploring proposals and methods for bus lane enforcement as set out under *Measure INT20 – Enforcement of Road Traffic Laws* of the Draft Greater Dublin Area Transport Strategy 2022-2042. Notwithstanding this, specific measures have been considered in the development of the Proposed Scheme that will help deter inappropriate and unlawful use of bus lanes including advanced bus signal detection systems which will activate green signals at traffic lights for authorised vehicles only.

In relation to the specific location referenced at the junction of the R118 Merrion Road and Shelbourne Road, the right turn to Shelbourne Road has been banned to improve the operation of the junction. The junction is in close proximity to the junction of the R118 Merrion Road and Anglesea Road and the removal of the dedicated right turn lane and movement to Shelbourne Road enables the improved optimisation of the set of junctions. Furthermore, it allows the pedestrian provision in the village of Ballsbridge to be enhanced through increased width of footpaths, including on the Balls Bridge itself. An alternative right turn movement will be provided for traffic further north through the

provision of a new right turn lane from Pembroke Road onto Lansdowne Road which will mitigate the risk of vehicles making an illegal turn at the Shelbourne Road junction.

It should also be noted that any right turns to Shelbourne Road will be heading east or northeast and as such, will be heading in the opposite direction to the proposed Bus Gate on Pembroke Road (between junctions of Waterloo Road and Eastmoreland Road). Alternative routes to the Baggot Street Upper area will be available via Donnybrook and also via Northumberland Road.

Junction Design

Summary of issue

The submission has queried the design approach undertaken by the NTA in relation to adopting international best practice. The submission references a 'Dublin-style' junction, 'Dutch-style' junction and 'CYCLOPS' junction and queries the safety rationale for the junction designs in the Proposed Scheme. The submission further notes that there are several junctions (Newtown Avenue, Rock Hill, Lansdowne Road etc.) that do not align with the general direction of DMURS to minimise corner radii.

Response to issue

1 Principles of Protected Junction Design for BusConnects

The NTA wishes to clarify that the following terms 'Dublin-style' junction, 'Dutch-style' junction and 'CYCLOPS' junction do not form part of the Proposed Scheme application description.

It is important to note that no two junctions are the same. Junctions on the Proposed Scheme have broadly been categorised into 4 types of junction as set out in Appendix A4.1 BusConnects Preliminary Design Guidance Booklet (PDGB) of the EIAR and specifically set out at each location in the Junction Design Report which have been included in Appendix A6.3 and summarised in Table 4.5, Table 4.12, Table 4.18, Table 4.25 and Table 4.32 in Chapter 4 of the EIAR. A more detailed description of the junction types on the Proposed Scheme is provided in Sections 5.3.3.1, 5.3.3.2, 5.3.3.3 and 5.3.3.4 of the Preliminary Design Report with a detailed summary of the junction types along the Proposed Scheme also provided in Table 5.1 and 5.2 of the Preliminary Design Report.

The junction types set out in the PDGB directly align to the Proposed Scheme core aim and objectives. One of the core aims of the Proposed Scheme is to:

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

The proposed scale of the BusConnects CBC Infrastructure Works will be transformational for cycling in Dublin, delivering a large number of the primary cycling routes identified in the Greater Dublin Area Cycle Network plan. With proposals of this scale, it is critical that the overall design approach matches the stated ambition, and can achieve a longevity that such investment deserves. With this in mind, the NTA set about developing 'Design Principles' for the project. These principles would complement existing documents and standards such as the National Cycle Manual and DMURS. The PDGB was developed to outline the agreed design principles and to enable consistency of design.

Documents such as the National Cycle Manual and DMURS continue to serve the engineering and development industry well and over the past 7-10 years, have played an important role in allowing Ireland to follow international best practice. The PDGB, like all guidance documents, was developed to be cognisant of the everchanging nature of society, including commuting patterns and behaviours. To acknowledge the expected increase in cycling numbers and to set about achieving the necessary 'step change' to cater for this increase, international best practice from countries which have already experienced this transition successfully was consulted. The ambition of the PDGB was to take the benefits of the traditional junction layout from the National Cycle Manual and supplement this with a range of measures aimed at increasing protection for cyclists and reducing uncontrolled conflict with pedestrians.

The Netherlands has one of the highest rates of bicycle use in the world, provides the widest range of cycling know-how and is famous worldwide for its cycling infrastructure. The 'Ontwerprijzer Fietsverkeer' (Dutch Cycle Design Guide) was used during the development of the PDGB. Of

particular interest to the NTA, was how the design of junctions could be improved to offer better protection to cyclists.

The typical protected junction layout, as shown in Figure 2.55 below, offers significant safety improvements compared to the traditional junction layout. The deflection of the cycle track at the junction allows the protection kerb (Note 4) to be positioned on the corner of the junction. In urban locations subject to spatial constraints, the protection kerb provides a tighter turning radius for vehicles and will force the left-turning motorist to reduce speed before making the tighter turn. This design layout also keeps straight-ahead and right-turning cyclists on the raised-adjacent cycle track as far as the junction, avoiding any cyclist-vehicle conflict at weaving and merging lanes, for example, where access to a dedicated left-turn lane would previously have necessitated a vehicle to cross the cycle lane. Right-turning cyclists will navigate the cycle lane on the junction and turn right (in a controlled manner) after it crosses the side arm. Other benefits to this junction design include:

- a) Traffic Signal arrangement removes any uncontrolled pedestrian-cyclist conflict;
- b) Raised and protected cycle track approaching junction;
- c) Reduced risk of side-swipe due to the removal of cyclist-vehicle conflict at weaving and merging lanes on all approaches;
- d) Improved right-turning safety; and
- e) Improved sight lines for left turning traffic.

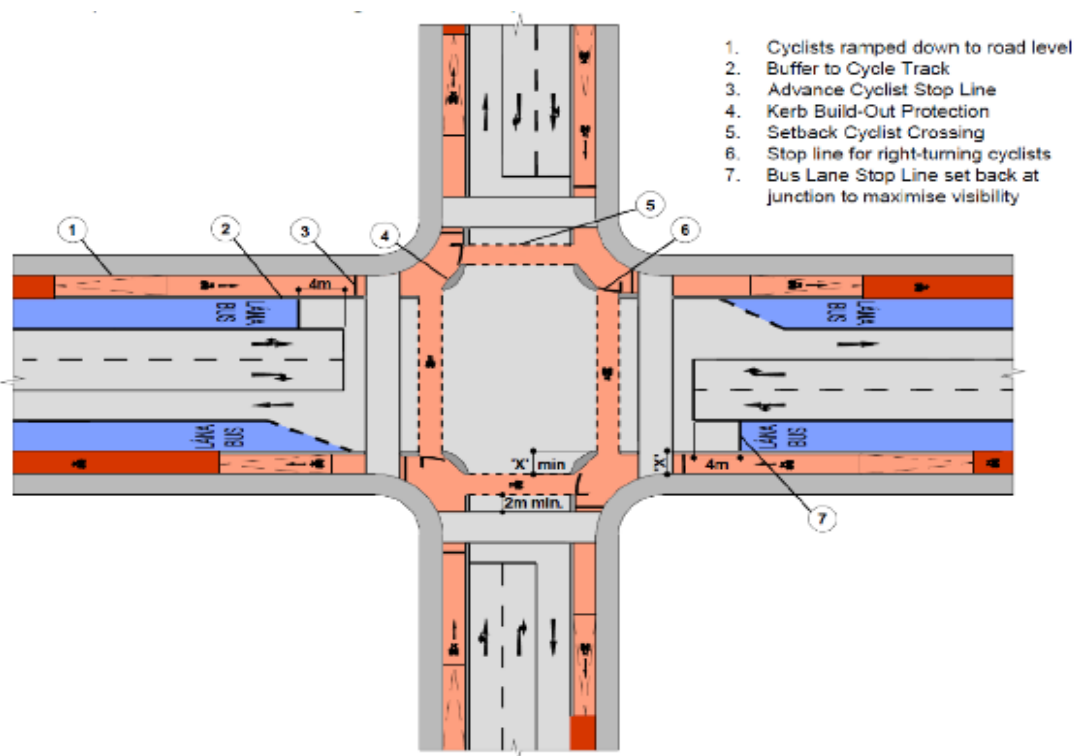


Figure 2.55: Typical Junction Layout from BusConnects Design Guidance Booklet

2 Pedestrian-Cyclist Conflict

Spatial constraints are an important factor in determining any junction design. This is especially the case in urban settings. Where possible, the protected junction has been proposed to be retrofitted into all existing junctions, taking into consideration the best practice from international settings including the Netherlands. The NTA notes the Dublin Commuter Coalition has set out their preference for the 'Dutch style' junction type as described within the submission. There are, however, legislative, behavioural and other practical considerations that need to be taken into account when looking at

these international examples. Consideration for all of these elements has led to the development of the four junction types described in the PDGB.

An important consideration during the development of the PDGB was the implementation of measures to mitigate pedestrian-cyclist conflict. The 'Dutch-style' junction described in the submission is typical of many junctions in the Netherlands and it allows for a potential un-signalised conflict between pedestrians and cyclists, which depends on a level of courtesy to ensure that collisions are avoided. Following discussions with Irish disability groups, the issue of this potential conflict was raised as a significant concern along the core bus corridors for the visually impaired and for the mobility impaired, based on their members' experiences. Pedestrians are the most vulnerable of road users, and the addition of disability exacerbates this vulnerability. The four junction types within the PDGB have specifically been set out to mitigate these potential conflicts insofar as is reasonably practicable, following the hierarchy of road users set out in DMURS which places pedestrians at the top of the hierarchy.

Similarly the layout of the 'dutch style' junctions described in the submission can result in a reduced level of service for pedestrians. The layout of these junctions require a multi-movement, sometimes multi-directional, non-continuous crossing for pedestrians, with at least 3 crossing movements (2 x cycle track crossing, 1x carriageway) to cross a side road of a typical junction. The intermediate landing area for pedestrians between the cycle track and carriageway requires a suitably sized holding area for pedestrians to wait before crossing the road. This can require a significant space for urban locations with high pedestrian volumes. Junction types 1-3 in the PDGB aim to consolidate and segregate/confine this waiting area to within the footpath, thus creating a more legible and functional use of the available space for all users with direct crossing facilities that align to the principles of DMURS.

It is for these reasons that the layout of the 'dutch style' junctions described in the submission have not been adopted for junctions on the Proposed Scheme.

3 Use of Traffic Signals to Yield to Cyclists

The concept of allowing both cyclists and general traffic to proceed together in the same direction is not uncommon and the same traffic signals arrangement also caters for left-turning traffic. In the Netherlands, there are scenarios where the equivalent right-turn movement can be green whilst cyclists are also green. There is, however, an additional requirement to yield to cyclists in this Dutch scenario (see Figure 2.56 below).



Figure 2.56 Example from the Netherlands of traffic signals + give way signage controlling turning traffic and cyclists (Source: Dutch Design Guide Ontwerpwijzer Fietsverkeer)

The arrangement depicted above from the Netherlands is beneficial for cyclists in that it minimises delay time but should be subject to design thresholds, which are outlined below. Heavy turning volumes, HGV movements (difficulty with blind spots), high speed environments etc. have been considered during the design of junctions as part of the Proposed Scheme. The PDGB also includes guidance on appropriate signage to be provided to reinforce the requirement for motorists to yield to straight ahead cyclists in such locations.

The Dutch themselves have a suite of solutions for different scenarios – no one solution works everywhere. For junctions to operate safely and effectively, it is critical that the control of all movements is considered. All road users can have their own traffic signals at junctions (pedestrians, cyclists, buses, vehicles). To achieve optimum operational efficiency including the efficient movement of cyclists, it is also possible for some movements to occur safely at the same time. To assist with these design decisions, thresholds for turning movements have been used. Chapter 6 (Page 153) of the Dutch Design Guide *Ontwerpwijzer Fietsverkeer* discourages partial conflicts between cyclists and vehicles if the volume of turning vehicular traffic exceeds 150 PCU¹s per hour. See the above extract from *Ontwerpwijzer Fietsverkeer* which identifies the above threshold.

To put the above turning thresholds into context, 150 PCUs per hour equates to approximately 5 cars on average turning per 120 second cycle, or between 3 and 4 cars turning on average per 90 second cycle. The Proposed Scheme also provides other measures such as kerb segregation, advanced position cycle stop lines and early starts for cyclists which will further segregate and reduce the number of interactions between cyclists and vehicles. All these elements form the basis of a typical junction design and operation, thus no one element of a junction design should be considered in isolation.

Seven of the 27 key junctions on the Proposed Scheme have implemented this approach to achieve optimum operational effectiveness including the efficient movement of cyclists. Introducing separate signal phases will increase delay for cyclists at junctions. This arrangement will promote the sustainable mode hierarchy for cyclists at junctions by providing priority to ahead cyclists over vehicles turning left. At each of these junctions the left turning vehicle traffic volumes in these locations are estimated to be less than the 150PCU threshold and similarly low HGV volumes are estimated in line with the principles established by international guidance. In addition to specific signage such as that presented in Figure 39 and Figure 40 of the PDGB, at each of the seven locations, a three to five second early start for cyclists is typically provided to further mitigate the potential for the number of interactions with vehicles/cyclists at these locations. The Proposed Scheme has also been subject to Road Safety Audits at different stages that have informed the design development of the Proposed Scheme.

Separately, the NTA and Dublin City Council will continue to promote the already established driver awareness campaign that seeks to promote driver awareness in line with the Road Safety Authority rules of the road as noted below. It is noted that these rules are also applicable within DLRCC.

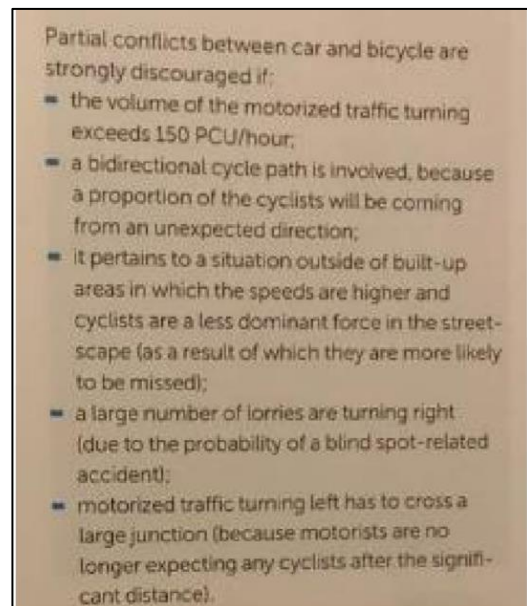


Figure 2.57: Extract from Dutch Design Guide *Ontwerpwijzer Fietsverkeer*

¹ Vehicle to Passenger Car Unit (PCU) conversion as per TfL Values; Pedal Cycle - 0.2, Motor Cycle – 0.4, Passenger Car/LGV – 1.0, Medium Goods Vehicle (MGV/OGV1) – 1.5, Buses and Coaches – 2.0 and Heavy Goods Vehicle (HGV/OGV2) – 2.3

When turning left, or right, all drivers must watch out for cyclists going ahead or turning. When making a turn, watch out for cyclists in front of you or coming up on your left or right. Do not overtake a cyclist as you approach a junction if you are turning left or right, as the cyclist may be continuing straight ahead.

4 Junction Corner Radii

Junction corner radii have been designed in line with the principles of DMURS and, where practicable, have been minimised and informed by swept path analysis. Some corner radii (Newtown Avenue, Rock Hill, Lansdowne Road junctions) are larger than what DMURS recommends due to the angle of the side arm alignment (which would require a larger swept path to make the turn), the presence of central medians, facilitating bus turning movements, etc.

Pedestrian Crossings

Summary of issue

The submission has queried the design rationale for providing two stage crossings as part of the Proposed Scheme, in particular at the following junctions: Temple Hill / Monkstown Road, Temple Road / Newtown Avenue, Frascati Road / Temple Road, Frascati Road/ George's Avenue and Nutley Lane / Stillorgan Road. The submission also notes some junctions are missing pedestrian crossings at one or more arms including Temple Road / Newtown Avenue, Frascati Road / Temple Road, Rock Road / Booterstown Avenue, Strand Road, Fitzwilliam Street Lower and Mount Street Upper and Nutley Lane / Stillorgan Road. The submission also requests that a pedestrian crossing be installed on Fitzwilliam Street at Fitzwilliam Lane.

Response to issue

The NTA acknowledges the comments raised in the submission and note that the Proposed Scheme will increase the number of controlled pedestrian crossings from 68 in the existing to 96 in the Proposed Scheme, equating to a 41% increase. Additionally, there will be an increase in the number of raised table crossings on side roads from 9 in the existing to 55 in the Proposed Scheme, equating to a 511% increase.

The summary level design rationale for each of the junctions on the Proposed Scheme is set out in Appendix A6.3 Junction Design Report of the Traffic Impact Assessment Report.

For the pedestrian crossings at the junctions of Temple Road / Newtown Avenue and Frascati Road / Temple Road, direct single movement crossings were explored in accordance with the approach set out in Section 5.6 of the PDGB. However, at these locations two stage crossings are the preferred design (consistent with the existing approach) due to the level difference between the inbound and the outbound carriageways either side of the central median. The staggered crossing allows for this level difference to be addressed within the central median over the necessary transition length in line with the design guidance in Building for Everyone: A Universal Design Approach. As such, the width of the central median (either existing or proposed) is not wide of enough to cater for the transition of levels on a suggested straight crossing, hence, staggered crossings are proposed to be retained.

At the Temple Hill / Monkstown Road junction, the presence of an existing CCTV pole within the central median precluded the removal of this median. It was also considered that the provision of a straight through crossing at this location would require the stop line on the southern arm of the junction to be set back significantly, with associated impacts on the junction operation as well as the proposed bus lane on this approach.

At the Frascati Road/ George's Avenue junction a central median is provided, however the crossing will run in a single stage.

As summarised in the Junction Design Report included in Appendix L of the Preliminary Design Guide in the Supplementary Information, at the Temple Road / Newtown Avenue Junction a pedestrian crossing is not proposed on the southern arm of the junction (consistent with the existing scenario) for the following reasons: 1) No immediate desire line identified, 2) a direct crossing distance would be in excess of 19m which would compromise overall people movement capacity within the junction due to lengthy intergreen periods, 3) the presence of the entrance to St. Vincent's Park to the southwest and

Temple Park Avenue to the northeast means that there is no space to locate pedestrian crossing landings safely to the south of the junction. Furthermore, a signalised pedestrian crossing is not proposed on the western arm of this junction (consistent with the existing scenario) due to the existing access arrangement to St Vincent's Park (which must be retained) as well as the presence of multiple private driveway accesses in close proximity to the junction which makes the provision of a signalised pedestrian crossing (and the associated traffic signal equipment) in this location impracticable. An uncontrolled crossing on the southwestern arm is proposed, however, to facilitate the pedestrian desire line on this side of the junction.

As summarised in the Junction Design Report, at the Frascati Road / Temple Road Junction, a pedestrian crossing is not proposed on the south-eastern arm (consistent with the existing scenario) of the junction for the following reasons: 1) No immediate desire line identified, 2) a crossing landing on the north-eastern side of the crossing would impact on the existing public realm and art installation which is set at a lower level than the edge of carriageway kerb and would require civil works to facilitate the landing and subsequent continuation of a formal footpath adjacent to the art installation, which would have a visual impact on the art installation, 3) a direct crossing distance would be in excess of 19m (see Section 5.6 of the PDGB) and would compromise overall people movement capacity within the junction due to lengthy intergreen periods.

As summarised in the Junction Design Report, at the Rock Road / Booterstown Avenue Junction a pedestrian crossing is not proposed on the northern arm (consistent with the existing scenario) of the junction for the following reasons: 1) No immediate desire line identified. 2) It is proposed to relocate all bus stops adjacent to this junction to the south-eastern arm which will result in the existing pedestrian crossing on this arm retaining the main desire line between the DART Station and the schools and bus stops.

As summarised in the Junction Design Report, at the Strand Road Junction, a pedestrian crossing is not proposed on the southern arm (consistent with the existing scenario) of the junction for the following reasons: 1) No immediate desire line identified. 2) a direct crossing distance would be in excess of 19m and would compromise overall people movement capacity within the junction due to lengthy intergreen periods.

At the Fitzwilliam Street Lower / Mount Street Upper, the Proposed Scheme ties into existing just west of the junction. All existing pedestrian crossings are retained at this junction. In relation to the request that a pedestrian crossing be installed on Fitzwilliam Street at Fitzwilliam Lane, the design team believe that this is not warranted as the Fitzwilliam Street Lower block has pedestrian crossings at either end which are only 150m apart. Also, Fitzwilliam Lane is only 60m from the nearest crossing at the junction with Baggot Street Lower.

As summarised in the Junction Design Report, at the Nutley Lane / Stillorgan Road Junction a pedestrian crossing is not proposed on the southern or western arms (consistent with the existing scenario). A staggered pedestrian crossing is proposed on the northern arm (consistent with the existing scenario). It is noted that the existing pedestrian crossing provision is proposed to be retained at this junction in the interim prior to the delivery of the Bray to City Centre Core bus Corridor Scheme, subject to the approval of that scheme, which proposes more significant junction alterations. A straight crossing at this location would result in a crossing distance of greater than 19m (see Section 5.6 of the PDGB) and the overall junction performance and people movement would be reduced which is not desirable at this location due to the dual-carriageway nature of the R138 Stillorgan Road. As outlined in Section 3.3 of the Preliminary Design Report, only minor interventions are proposed under the Proposed Scheme at this junction, associated with a new two-way cycle crossing facility. This layout is shown in Figure 2.58 below. More comprehensive improvement measures are proposed at this junction as part of the Bray to City Centre CBC scheme, which includes for the provision of pedestrian crossings on all arms of this junction. This layout is shown in Figure 2.59 below.

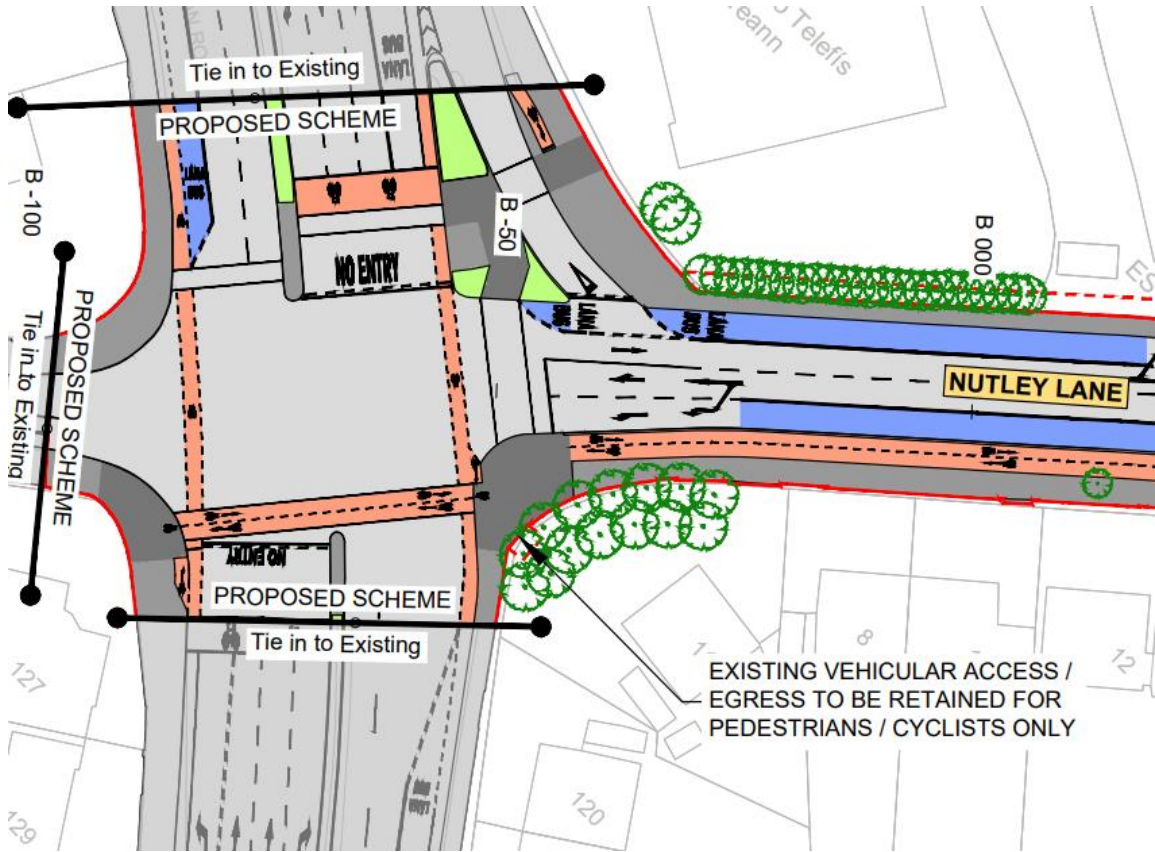


Figure 2.58: Proposed Junction Layout as part of the Proposed Scheme

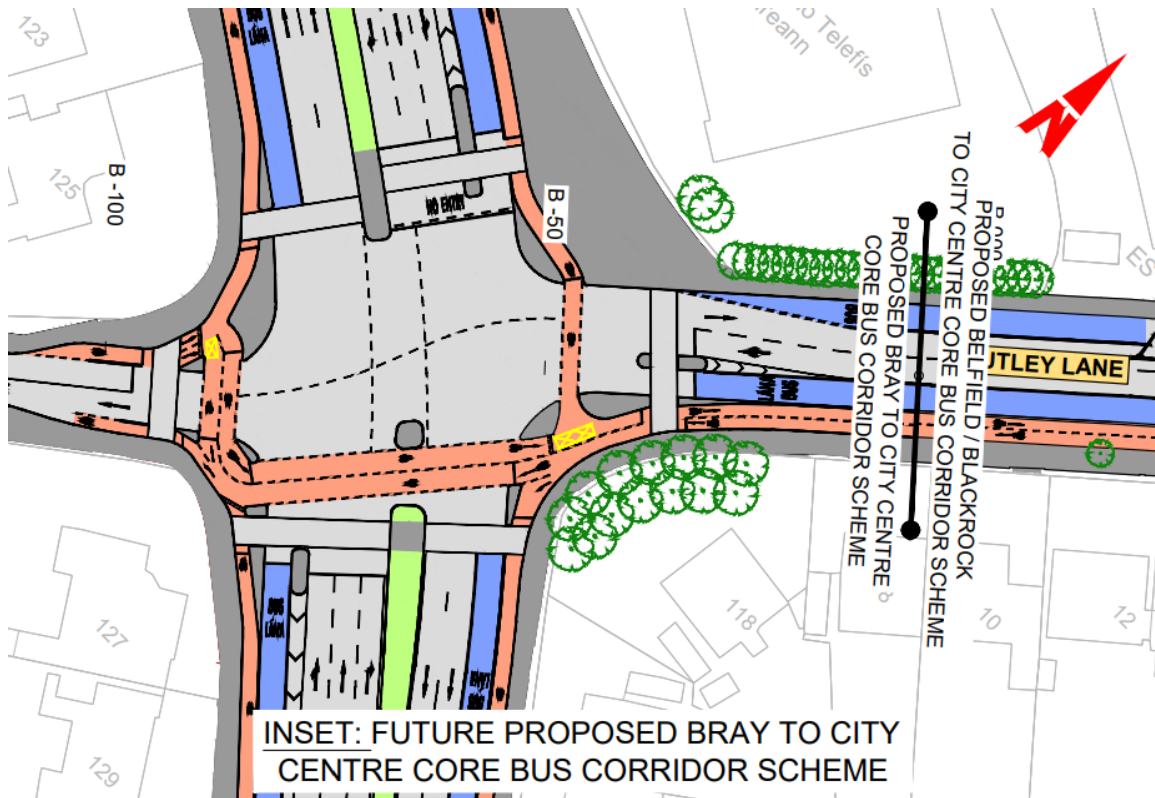


Figure 2.59: Proposed ultimate junction layout following implementation of the Proposed Scheme and the Bray to City Centre CBC Scheme

Shared Space

Summary of issue

The submission notes that the Proposed Scheme includes for the provision of shared space for pedestrians and cyclists at a number of junctions and asserts that this is an unsuitable arrangement for busy urban junctions. The submission requests that pedestrians and cyclists be segregated at all junctions for the safety and comfort of everyone.

Response to issue

The National Cycle Manual notes that where practicable, the segregation of pedestrians and cyclists is desirable, and shared facilities should not be considered as a first option. The National Cycle Manual recognises, however, that in some cases, shared facilities are appropriate. The design of the Proposed Scheme has been undertaken such that pedestrians and cyclists are segregated wherever practicable and shared spaces are only used in specifically constrained locations, typically at junctions where there is insufficient space to provide a protected junction thereby requiring cyclists to make turning movements via toucan crossings.

Bus Stop Design

Summary of issue

The submission raises concerns about the proposed bus stop designs and in particular the width of bus stop islands that are proposed which may lead to pedestrian and cyclist conflicts.

Response to issue

The NTA welcomes Dublin Commuter Coalition's comments in relation to the importance of considering the pedestrian/cyclist interaction at bus stops. In Section 11 of EIAR Chapter 4, Proposed Scheme Description Appendix A4.1 Preliminary Design Guidance Booklet (PDGB) sets out the key measures to address the concerns raised in relation to vulnerable users at these locations which is further elaborated in Section 4.14 of the Preliminary Design Report in the Supplementary Information. These details have evolved as a result of direct consultation between the NTA and representative mobility groups, accessibility audits and road safety audits which have been carried out during the development of the Proposed Scheme.

As described in PDGB Section 11.1 Island Bus Stop, these types are the preferred bus stop option to be used as standard on the CBC project where space constraints allow. Island bus stops reduce the potential for conflict between pedestrians, cyclists and stopping buses by deflecting cyclists behind the bus stop, thus creating an island area for boarding and alighting passengers. On approach to the bus stop island the cycle track is intentionally narrowed, with yellow bar markings also used to promote a low-speed single file cycling arrangement on approach to the bus stop. Similarly, a horizontal cycle track deflection is proposed on the approach to the island to reduce cyclists' speed on approach to the controlled pedestrian crossing point on the island. To address the potential pedestrian/cyclist conflict, a pedestrian priority crossing point is provided for pedestrians accessing the bus stop island area.

Where space constraints do not allow for an island bus stop, PDGB Section 11.2 Shared Bus Stop Landing Zone provides an option consisting of a shared bus stop landing zone that may be considered. This proposed arrangement will remove the conflict between cyclists and stopping buses by ramping cyclists up to the footpath level where they continue through the stop.

Section 11.2 goes on to explain that to address the pedestrian/cyclist conflict, which would apply to wheelchair users also, the cycle track should be narrowed on approach to the bus stop and yellow bar markings should be provided to alert cyclists to the potential conflict ahead. In addition to this, at the bus stop, the cycle track should be deflected to provide a 1.0m wide boarding/alighting zone for bus passengers, including wheelchair users. Also, appropriate tactile kerbing should be provided to ensure that visually impaired users are aware of crossing areas.

Section 4.14.4 Preliminary Design Report in the Supplementary Information outlines the location where island bus stops are proposed. Section 4.14.5 of the same document outlines the locations where shared landing area bus stops are proposed.

Bus Stop Locations

Summary of issue

The submission raises concerns about the location of some of the bus stops proposed as part of the Proposed Scheme, in particular at Temple Hill and Baggot Street Lower. The primary concerns relate to the ability for bus passengers to interchange with proposed orbital routes and the submission requests that additional bus stops are added on side roads of junctions to cater for orbital bus movements.

Response to issue

Appendix H of the Preliminary Design Report included in the Supplementary Information includes the Bus Stop Review Report. This report sets out a comprehensive exercise which has been carried out to review existing bus stops along the route of the Proposed Scheme and, where appropriate to rationalise these stops in line with best practice principles related to bus stop placement. These principles include:

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

As noted, a main consideration in the siting of bus stops was minimising walking distance between interchange stops. This exercise was carried out with cognisance of the interface with orbital routes proposed as part of the Dublin Area Bus Network Redesign, which involved significant liaison with the BusConnects Dublin Area Bus Network Redesign team.

The scope of the Proposed Scheme includes the provision of infrastructure for bus services routed along the main corridor, i.e. from Belfield / Blackrock to the City Centre. Infrastructure for orbital bus routes, if required, will be delivered as part of a separate orbital core bus corridor scheme, whereby the provision of bus stops, including their location, can be assessed on a holistic basis along the orbital corridor, taking into account the location of existing nearby bus stops which are outside the red line boundary of the Proposed Scheme.

Parking Spaces

Summary of issue

The submission queries the provision of parking spaces on the Merrion Road south of Merrion Gates. It notes that there is no demand for these parking bays and that northbound drivers may be encouraged to perform a dangerous u-turn to access them.

Response to issue

As noted in the Parking Survey Report, additional parking spaces are proposed in this location to mitigate the removal of all Pay & Display and Permit Parking spaces on Merrion Road southbound between Nutley Lane and Strand Road as well as the removal of informal parking which occurs in the bus lane/clearway in this area outside of the hours of operation of the bus lane. As such, there is demand for these parking spaces.

Nutley Lane

Summary of issue

The submission states that the proposed design for Nutley Lane is inadequate for pedestrians and notes that the removal of the footpath should be avoided at all costs. The submission proposes making Nutley Lane one-way for traffic to implement cycle lanes, bus lanes and footpaths on both sides of the road.

Response to issue

Chapter 3 of the EIAR, Consideration of Reasonable Alternatives, sets out the route options assessment process to determine the Preferred Route Option for the Proposed Scheme. In relation to Nutley Lane, as outlined in Section 3.4.1 of the EIAR, from a review of submissions received as part of the first round of non-statutory public consultation for this route, as well as a review of the topographical survey carried out subsequent to the route's publication, a number of issues were identified. The proposed removal of on-street trees and those in front gardens was a significant cause for concern amongst residents. These issues primarily relate to the section of Nutley Lane between the St. Vincent's University Hospital entrance / Nutley Avenue and the Elm Park Golf and Sports Club entrance due to the number of residential properties fronting onto the north-western side of the road, including a number which were proposed to be subject to land acquisition, and the number of on-street trees.

The Emerging Preferred Route (EPR) Option on Nutley Lane consisted of the two general traffic lanes, two bus lanes, two cycle tracks and two footpaths, from the R138 Stillorgan Road junction to the R118 Merrion Road junction. In order to achieve this, the EPR Option design indicated a loss of existing trees and parking along the length of Nutley Lane, as well as potential land take on both sides of the road (including a number of front gardens on the north-west side immediately adjacent to Nutley Avenue).

The proposed road alignment was revised to retain the existing kerb line on the residential side, and as such, retain the existing on-street trees along this footpath, and remove the requirement for land acquisition and tree removal in private residential properties on the north-western side of Nutley Lane. In order to minimise the incursion into the properties on the opposite side of the road as a result (SVUH Mortuary, Elm Park Golf and Sports Club), additional design development was carried out. This included delaying the on-set of the proposed southbound bus lane to the south of the St. Vincent's University Hospital entrance. In addition, it was determined that no footpath is to be proposed on the south-eastern (Elm Park Golf and Sports Club) side of Nutley Lane over this section from just south of the St. Vincent's University Hospital entrance junction to just north of the Elm Park Golf and Sports Club entrance junction, with dedicated pedestrian crossings provided at both ends. The proposed removal of parking and the fact that there are no private entrances along this section (which would require footpath access) enables the removal of the footpath on this side of Nutley Lane. By combining the two directions of cycle track on Nutley Lane into the proposed 2-way cycle track, less land take is required from the Elm Park Golf and Sports Club than would be necessary if two 2m wide cycle tracks were provided separately on either side of the road. The proposed 2-way cycle track has been provided along the Elm Park Golf and Sports Club side of the road to take advantage of the reduced quantum of driveways and access junctions on that side, thus minimising cyclist-motorist conflict. The 2-way cycle track in this location also caters for cycle connectivity between SVUH and UCD.

Treatment at Minor Junctions

Summary of issue

The submission queries the treatment of cycle lanes at minor roads and notes that while the raised crossing is welcome, it is not clear why the cycle track is narrowed, rather than the cycle track curving in slightly.

Response to issue

In line with Section 8.1 of the PDGB, where a two-way cycle track crosses a minor junction, it is proposed that the two lanes of the cycle track are narrowed as it crosses the mouth of the junction and deflected slightly away from the mainline carriageway. The narrowing will act as a traffic calming measure to cyclists, albeit cyclists will still maintain priority. This traffic calming measure is deemed necessary as the presence of the proposed 2-way cycle track may result in some motorists encountering cyclists approaching the junction from the opposite direction that they were expecting.

Yellow boxes

Summary of issue

The submission believes that yellow boxes should be extended in certain locations to avoid vehicles being stranded in dangerous areas and impeding active travel users. The submission notes in particular the Strand Road junction at Merrion Gates and the Rock Road at Phoenix Terrace.

Response to issue

Yellow boxes have been provided in these locations to replicate or indeed increase the existing provision.

2.4.5 30 – Dublin Cycling Campaign

Overview of submission

This submission raised the following issues:

- i) Advocate for the Proposed Scheme;
- ii) Cycling for all ages and abilities;
- iii) Existing Cycling Conditions;
- iv) Welcome Improvements;
- v) Requested Modifications;
 - a. Width of cycle track;
 - b. Shared Walking and Cycling Spaces and Crossings;
 - c. Right Turn Movements;
 - d. Other Modifications; and
 - e. Connections beyond the scheme.
- vi) Junction Design;
- vii) Location Specific Comments;
 - a. Newtown Avenue and Entrance to St. Vincent's Park;
 - b. Nutley Lane;
 - c. Ballsbridge; and
 - d. Baggot Street Upper.

2.4.5.1 Advocate for the Proposed Scheme

Summary of issue

The introduction of the submission outlines that the Dublin Cycle Campaign is '*extremely happy to see this proposal*'. The submission sets out that the Dublin Cycling Campaign is a registered charity that advocates for better cycling conditions in Dublin. The submission notes that the Dublin Cycling Campaign has been engaging with the NTA through all stages of the project including multiple rounds

of public consultation, community forums, and through one to one meetings. The submission notes that its April 27th submission to Dún Laoghaire-Rathdown County Council in relation to the recently proposed pedestrian and cycling facility between Blackrock and Trimleston Avenue (referred to as Trimlestown Road in the submission) is also relevant. The submission states its support for the project and has requested modifications to the Proposed Scheme design. The submission also requests an Oral hearing from the Board. The submission notes the hierarchy of transport modes outlined in the Department of Transport's Infrastructure Investment Framework (NIFTI).

Response to issue

The NTA recognises the benefit that the continued engagement with the Dublin Cycling Campaign and other advocacy groups through the three rounds of non-statutory public consultation, community forums and one to one meetings, has had in developing the Proposed Scheme. The NTA notes that the Dublin Cycle Campaign are extremely happy with the proposal and welcomes the support from the charity for implementing the Proposed Scheme. The NTA notes the request for an Oral hearing which will be a matter for An Bord Pleanála to decide. Requests to modify particular detailed design aspects of the Proposed Scheme are noted and the NTA have provided responses to those requests as set out in the following sections. The NTA looks forward to the continuation of collaboration with the Dublin Cycling Campaign in achieving the Proposed Scheme objectives which have many synergies with the Dublin Cycling Campaign's vision for a vibrant city where people of all ages and abilities can choose to cycle as part of their everyday life. The NTA notes the reference to the Department of Transport's Infrastructure Investment Framework (NIFTI). As referenced in the EIAR Section 3.2.3 of the Traffic Impact Assessment Report (Volume 4 Appendices Part 1 of 2, A6.1 Transport Impact Assessment Report), the recently published National Investment Framework for Transport in Ireland (NIFTI) sets out a hierarchy of travel modes to be accommodated and encouraged when investments and other interventions are made. Sustainable modes, starting with active travel (walking, wheeling and cycling) and then public transport, will be encouraged over less sustainable modes such as the private car. This aligns with the core objectives of the Proposed Scheme. It is noted that Section 3.2.3 of the Traffic Impact Assessment Report (Volume 4 Appendices Part 1 of 2, A6.1 Transport Impact Assessment Report) refers to the Draft National Investment Framework for Transport in Ireland (NIFTI) (2021), however, this policy was finalised and published on 21 December 2021. It is therefore clarified that this reference should be to the final National Investment Framework for Transport in Ireland (NIFTI) (2021).

2.4.5.2 Cycling for all ages and abilities

Summary of issue

The submission sets out the views of the Dublin Cycling Campaign in relation to categorising different cyclists into four types including *Strong and Fearless, Enthused and Confident, Interested but Concerned, and No Way, No How*. The submission provides a graphical representation of the four types of cyclists in the Appendix and suggests that the Proposed Scheme needs to resolve particular issues to attract the large '*Interested but Concerned*' cohort of cyclists to promote modal shift to fulfil the goals of the National Sustainable Mobility Policy. The submission also notes that reductions in 'school run' traffic will be important measure of how much the '*Interested but Concerned*' cohort are attracted to active travel and suggest that the NTA should be encouraged to track this metric.

Response to issue

The NTA acknowledges the submission's approach to categorising cyclists by characteristic type and notes that there are multiple industry studies that have taken a similar approach, however, the Proposed Scheme has not set out to target any particular cycling cohort. The Proposed Scheme will provide a safe, sustainable transport corridor that can provide a sustainable alternative mode of transport for all ages and abilities.

Comments raised in relation to the recently published National Sustainable Mobility Policy are noted and the Proposed Scheme's aims and objectives as set out in Section 1.2 of Chapter 1 in the EIAR have a direct alignment to the objectives that underpin this policy.

The NTA notes the reference to 'school run' traffic. One of the objectives of the Proposed Scheme as set out EIAR Volume 2 Chapter 1 Introduction is to:

“Improve accessibility to jobs, education and other social and economic opportunities through the provision of improved sustainable connectivity and integration with other public transport services.”

It is noted that the Proposed Scheme will serve a significant number of schools and other educational facilities including Willow Park School, Blackrock College, Pembroke Montessori School, St. Mary’s Boys National School and the City of Dublin Education and Training Board (CDETB) in Ballsbridge. The Proposed Scheme will significantly enhance safe and reliable access to these facilities by bus, cycling and walking.

2.4.5.3 Existing Conditions

Summary of issue

The submission states the existing cycling conditions along the Proposed Scheme are poor. The submission notes that on Rock Road cyclists share with buses, taxis and other vehicles. It notes that the junctions are unsafe and have little cycle infrastructure and in some cases cycle lanes have traffic lanes on either side of them. It is noted that there are some good elements such as the cycle path through Booterstown and Blackrock Parks, the improved public realm in Blackrock Village and the cycleway along the Blackrock bypass.

Response to issue

The NTA acknowledges the comments raised in relation to the existing environment for cyclists. An assessment of the existing arrangement compared to the Proposed Scheme has been set out in Appendix A6.4.2 of the Transport Impact Assessment and summarised in Section 8 of the Transport Impact Assessment main report. The results of the assessment demonstrate that the Level of Service of the Do Minimum (existing infrastructure) scenario is typically of C rating. For the Do Something (Proposed Scheme) scenario, the Level of Service is predominantly of the highest A / A+ rating, with the exception of four highly constrained sections which received a rating of B (Strand Road to Nutley Lane, Ailesbury Road to Shrewsbury Road, Ballsbridge to Northumberland Road and Haddington Road to Fitzwilliam Street). The improvements will have a Medium Positive Impact for Sections 2 (Booterstown Avenue to Nutley Lane), 4 (Ballsbridge to Merrion Square (Pembroke Road, Baggot Street and Fitzwilliam Street)) and 5 (Nutley Lane) of the Proposed Scheme and a Low Positive Impact for Sections 1 (Stradbroke Road to Booterstown Avenue) and 3 (Merrion Road (Nutley Lane to Ballsbridge) of the Proposed Scheme. Additional information in relation to the Level of Service Impact assessment can be found in Section 4.2.3.1 of the Transport Impact Assessment Report.

Comments in relation to the cycling infrastructure at junctions are noted. As set out in Chapter 4, Section 4.6.7, junctions have been designed to ensure a high degree of comfort and priority for sustainable modes of travel, including cyclists.

The reference to existing high quality infrastructure is also noted. While they do not form part of the Proposed Scheme, the Proposed Scheme ties into the cycle path through Booterstown and Blackrock Parks and complements these existing facilities. The Proposed Scheme largely retains the existing cycle facilities along Frascati Road in their current arrangement. In relation to the improved public realm within Blackrock Village, this does not form part of the Proposed Scheme, and as these works were carried out as temporary measures in response to COVID-19, the scheme does not tie into this current arrangement. Notwithstanding this, the scheme design does not preclude these measures, should they be made permanent. Overall, this section of the submission serves to outline the deficiencies that the corridor has currently with respect to cycling provision, which the Proposed Scheme improves significantly.

Welcome Improvements

Summary of issue

The submission states the proposed cycling infrastructure would significantly improve the existing situation that would attract more cyclists to the route due to a number of factors including the continuous kerb protected cycle tracks, segregation of buses and cyclists at bus stops, protected junction designs and the removal of slip lanes.

Response to issue

The NTA acknowledge and welcome the comments raised in relation to the support for the Proposed Scheme including the kerb protected cycle tracks, provision of island bus stops and protected junction designs. Comments relating to concerns over junctions designs are noted and responded to in subsequent sections.

2.4.5.4 Requested Modifications

a. Width of Cycle Track - Summary of issue

The submission notes that at the very least, cycle tracks should be wide enough for cyclists to overtake each other comfortably. The submission further notes the importance of providing wide cycle tracks for inclusivity, given that non-standard cycles are typically wider than standard cycles. It is further noted that cycle tracks of 2 to 2.25m width allow two people to cycle side-by-side allowing for parents to cycle with smaller children or older children cycling to school with friends. The submission specifically references Rock Road and Merrion Road as areas of concern.

a. Width of Cycle Track - Response to issue

The NTA recognises the importance of accommodating the full range of cycles to ensure routes are accessible to all cyclists. The NTA notes the comments raised in the submission and notes that Section 2 of the PDGB outlines the objectives of the design guidance document. Within this section the following statement is made:

“In the approach to cycle infrastructure design, the BusConnects project not only aims to cater for existing cyclists, but more particularly for younger and older cyclists, mobility impaired cyclists and new cyclists as well as those who currently do not cycle but would be prepared to, subject to improved safety and greater cycle infrastructure provision.”

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

Whilst cycles can come in a range of shapes and sizes (for example standard, tandem, recumbent, cargo, handcycle, wheelchair user tricycle, articulated bikes with additional child trailer or trailer bikes), these cycles are typically less than 1m in width and will be accommodated by the Proposed Scheme.

b. Shared Walking and Cycling Spaces and Crossings - Summary of issue

The submission notes the following in relation to shared walking and cycling spaces and crossings:

“Pedestrians, cyclists and disability groups all dislike shared spaces that mix walking, wheeling and cycling – this mixing leads to conflict and to people finding these shared spaces confusing and intimidating. The applicant should revisit the designs where space is shared, particularly Toucan crossings.”

The submission makes specific reference to Emmet Square/Blackrock Clinic, Nutley Avenue and Ballsbridge Village Centre.

b. Shared Walking and Cycling Spaces and Crossings – Response to issue

The NTA notes the request in the submission to revisit the provision of toucan crossings. Toucan crossings have been provided in a number of locations as part of the Proposed Scheme to facilitate access to destinations and to cater for pedestrian and cyclist movements across the main corridor. At junctions, toucan crossings have been provided where it would be impracticable to provide a protected junction arrangement. Toucan crossings have also been provided in some locations away

from junctions, or mid-block. It is likely that a range of movements will be required at these crossings including:

- *U-turn to access a destination back along the path of origin but on the opposite side of the road to travel;*
- *Access to a destination located in the immediate vicinity of the crossing on the opposite side of the road (e.g. a shop, house, cycle parking);*
- *Access to a destination located further along the path of travel but on the opposite side of the road (which cyclists could access by dismounting and walking to the ultimate destination).*

A toucan crossing will facilitate each of the above movements adequately and safely for all road users, and is preferred to provide a balanced solution to cater for pedestrian and cycle users.

It is noted that dedicated crossings for cyclists, would require a two-way cycle crossing facility to enable similar movements in both directions with a potential for shared surfaces on each side of the crossing to facilitate the movement across the footpath to the key destination access described in the last two bullet points above. It is therefore preferred to retain toucan crossings in these locations.

The provision of toucan crossings in mid-block scenarios is set out in Section 7.5 of the PDGB. Figure 28 and Figure 29 of the PDGB provide the two configurations that exist on the Proposed Scheme.

c. Right Turn Movements – Summary of issue

The submission requests that right-turn movements for cyclists are reviewed at all proposed major junctions. It is noted that a number of the designs make it nearly impossible for cyclists to turn right, i.e. northbound on Stradbroke Road turning into Monkstown Road. It is also requested that some minor roads, e.g. Nutley Lane, where toucan crossings are proposed, be reviewed.

c. Right Turn Movements – Response to issue

As outlined in the PDGB, the provision of kerb protected junctions throughout the Proposed Scheme will significantly improve safety for cyclists turning right at signalised junctions. In specific constrained locations, where the provision of protected junctions is not practicable, toucan crossings have been provided to provide a safe crossing facility for cyclists. With regard to the right turn from Stradbroke Road travelling northbound into Monkstown Road, the Proposed Scheme ties into an existing arrangement of toucan crossings between Temple Hill and Monkstown Road which can connect right turning cyclists to the crossing on Monkstown Road. With regard to Nutley Lane, a number of Toucan crossings are proposed which the NTA believe adequately provide for right turn movements.

d. Other Modifications – Summary of issue

The submission notes that right turn from general traffic lanes into minor roads should be removed as these introduce conflicts with cyclists travelling straight ahead. It is further noted that green buffers should be provided wherever possible between cycle lanes and bus/general traffic lanes to improve the quality of experience for cyclists. It is further noted that yield road markings where cycle lanes end on side arms are contrary to NIFTI hierarchy, and requests that these be revised in the design.

d. Other modifications – Response to issue

The NTA notes the comments in relation to right turns into minor roads. It would be impracticable to remove all right turns from general traffic lanes into minor roads throughout the Proposed Scheme. As outlined in the PDGB, the treatment on minor roads provides priority for pedestrians and cyclists through the provision of a raised entry treatment with splayed kerbs providing a step change from the carriageway to the cycle track and from the cycle track to the footpath.

Separately, the NTA and Dublin City Council will continue to promote the already established driver awareness campaign that seeks to promote driver awareness in line with the Road Safety Authority rules of the road as noted below.

Table 6.3: Pedestrian Junction Assessment Criteria

Aspect	Indicator
Routing	Are pedestrian crossings (signalised or uncontrolled) available on all arms?
Directness	Where crossings are available, do they offer direct movements which do not require diversions or staggered crossings i.e., no or little delay required for pedestrians to cross in one direct movement?
Vehicular speeds	Are there measures in place to promote low vehicular speeds, such as minimally sized corner radii and narrow carriageway lane widths?
Accessibility	Where crossings exist, are there adequate tactile paving, dropped kerbs (or raised table treatment) and road markings for pedestrians (including able-bodied, wheelchair users, mobility impaired and pushchairs)?
Widths	Are there adequate footpath and crossing widths in accordance with national standards?

When turning left, or right, all drivers must watch out for cyclists going ahead or turning. When making a turn, watch out for cyclists in front of you or coming up on your left or right. Do not overtake a cyclist as you approach a junction if you are turning left or right, as the cyclist may be continuing straight ahead.

The NTA notes the comments raised in relation to green buffers. The National Cycle Manual provides information in relation to the typical arrangement for cycle lanes adjacent to bus lanes as set out below noting that this arrangement is typically applicable to collector or district distributor roads up to 60km/hr. The Proposed Scheme provides additional measures including continuous kerb segregated cycle tracks typically 2m wide (this arrangement allows for two-abreast cycling) and other traffic calming measures. 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. Careful consideration needs to be given when introducing grassed buffers such that a consistent and legible layout can be understood by all road users. Key elements including, available space, entrances, side roads, trees, site grading/levels, drainage and utilities need to be considered, hence the introduction of green buffer spaces may not be suitable at all locations.

The NTA notes the comments in relation to yield markings on cycle tracks. These are typically provided where the scheme ties into the existing arrangement on a side road where there are no cycle facilities present. As such, yield markings are provided to warn cyclists that they are leaving a protected cycle facility and must yield to general traffic. The safety implications of these proposals have been considered by the designer and by an independent auditor as part of the Road Safety Audit carried out on the Proposed Scheme and included in Appendix M of the Preliminary Design Report in the Supplementary Information. No problems were raised relating to such yield markings for cyclists as part of the Road Safety Audit.

e. Connections beyond the Scheme – Summary of issue

The submission notes that a small number of connections beyond the scheme red line boundary could greatly facilitate surrounding populations to access and use the scheme and gives examples of cycle lanes on Mount Merrion Avenue connecting with Blackrock Village at Carysfort Avenue and Rock Hill and to the Coastal Mobility Route at Newtown Avenue. A further example at Shelbourne Road is cited.

e. Connections beyond the Scheme – Response to issue

These suggested additional measures are noted by the NTA. The aim of the Proposed Scheme is to provide enhanced walking, cycling and bus infrastructure on this key access corridor in the Dublin region, which will enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor. While it would be desirable to improve all surrounding areas as well, the Proposed Scheme does not have the remit to do so, and it has focussed on the stated aim, to improve facilities along the corridor. It is possibly likely that future schemes, brought forward either by the relevant local authority or the NTA, will address these connections and the Proposed Scheme allows for this to happen at a future date.

f. Enforcement – Summary of issue

The submission notes that existing cycle tracks are abused every day by parking motorists due to a lack of enforcement and highlights that no provision for enforcement cameras has been made as part of the Proposed Scheme.

e. Enforcement – Response to issue

The NTA acknowledges the comments raised in relation to camera enforcement. Whilst enforcement for the lawful use of bus lanes is currently a matter for An Garda Síochána, the NTA is separately exploring proposals and methods for bus lane enforcement as set out under *Measure INT20 – Enforcement of Road Traffic Laws* of the Draft Greater Dublin Area Transport Strategy 2022-2042. Notwithstanding this, specific measures have been considered in the development of the Proposed Scheme that will help deter inappropriate and unlawful use of bus lanes including advanced bus signal detection systems which will activate green signals at traffic lights for authorised vehicles only.

2.4.5.5 Junction Design Summary of Issue

The submission has categorised/summarised the 4 typical junction types as set out in Appendix A6.3 Junction Design Report to two styles of junction for cyclists. The submission has referred to Junction Type 4 as ‘the Cyclops junction’ type and junctions Type 1, 2 and 3 as the ‘Dublin-style’ junction. The submission suggests that the proposed Junction Types 1-3 allow for vehicles to turn left while cyclists will be crossing the junction, leading to ‘left hook’ collisions and also suggests that Junction Type 4 eliminates the ‘left hook’ collision. The submission makes reference to the importance for shorter pedestrian crossings for those with mobility impairments. The submission also makes reference to constructed examples of junction types and legacy and legacy BusConnects designs which the submission has referred to as ‘Dutch-style’ junction designs with designs with some example visuals which align to the text submission. The submission also makes reference to the Pedestrian Infrastructure Assessment in EIAR Chapter 6, and notes that the criteria considered does not include the pedestrian crossing distance when assessing junction quality.

Response to Issue

Principles of Protected Junction Design for BusConnects

The NTA wishes to clarify the following terms and associated visuals provided in the appendix of the submission including ‘Cyclops junction’, ‘Dublin-style’ junction and ‘Dutch-style’ junction do not form part of the Proposed Scheme application description.

It is important to note that no two junctions are the same. As noted in the submission, junctions on the Proposed Scheme have broadly been categorised into 4 types of junction as set out in Appendix A4.1 BusConnects Preliminary Design Guidance Booklet (PDGB) of the EIAR and specifically set out at each location in the Junction Design Report which have been included in Appendix A6.3 and summarised in Table 4.5, Table 4.12, Table 4.18, Table 4.25 and Table 4.32 in Chapter 4 of the EIAR. A more detailed description of the Junction types on the Proposed Scheme is provided in Sections 5.3.3.1, 5.3.3.2, 5.3.3.3 and 5.3.3.4 of the Preliminary Design Report with a detailed summary of the junction types along the Proposed Scheme also provided in Table 5-1 and Table 5-2 of the Preliminary Design Report. It should be noted that only junction Types 1 and 3 are proposed for the Proposed Scheme, i.e. neither Junction Type 2 nor 4 are proposed.

The junction types set out in the PDGB directly align to the Proposed Scheme core aim and objectives. One of the core aims of the Proposed Scheme is to:

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

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

NTA set about developing 'Design Principles' for the project. These principles would complement existing documents and standards such as the National Cycle Manual and DMURS. The PDGB was developed to outline the agreed design principles and to enable consistency of design.

Documents such as the National Cycle Manual and DMURS continue to serve the engineering and development industry well and over the past 7-10 years, have played an important role in allowing Ireland to follow international best practice. The PDGB, like all guidance documents, was developed to be cognisant of the everchanging nature of society, including commuting patterns and behaviours. To acknowledge the expected increase in cycling numbers and to set about achieving the necessary 'step change' to cater for this increase, international best practice from countries which have already experienced this transition successfully was consulted. The ambition of the PDGB was to take the benefits of the traditional junction layout from the National Cycle Manual and supplement this with a range of measures aimed at increasing protection for cyclists and reducing uncontrolled conflict with pedestrians.

The Netherlands has one of the highest rates of bicycle use in the world, provides the widest range of cycling know-how and is famous worldwide for its cycling infrastructure. The 'Ontwerpwijzer Fietsverkeer' (Dutch Cycle Design Guide) was used during the development of the PDGB. Of particular interest to the PDGB team, was how the design of junctions could be improved to offer better protection to cyclists.

The typical protected junction layout in Figure 2.60 below offers significant safety improvements compared to the traditional junction layout. The deflection of the cycle track at the junction allows the protection kerb (Note 4) to be positioned on the corner of the junction. In urban locations subject to spatial constraints, the protection kerb provides a tighter turning radius for vehicles and will force the left-turning motorist to reduce speed before making the tighter turn. This design layout also keeps straight-ahead and right-turning cyclists on the raised-adjacent cycle track as far as the junction, avoiding any cyclist-vehicle conflict at weaving and merging lanes, for example, where access to a dedicated left-turn lane would previously have necessitated a vehicle to cross the cycle lane. Right-turning cyclists will navigate the cycle lane on the junction and turn right (in a controlled manner) after it crosses the side arm. Other benefits to this junction design include:

- a) Traffic Signal arrangement removes any uncontrolled pedestrian-cyclist conflict;
- b) Raised and protected cycle track approaching junction;
- c) Reduced risk of side-swipe due to the removal of cyclist-vehicle conflict at weaving and merging lanes on all approaches;
- d) Improved right-turning safety; and
- e) Improved sight lines for left turning traffic.

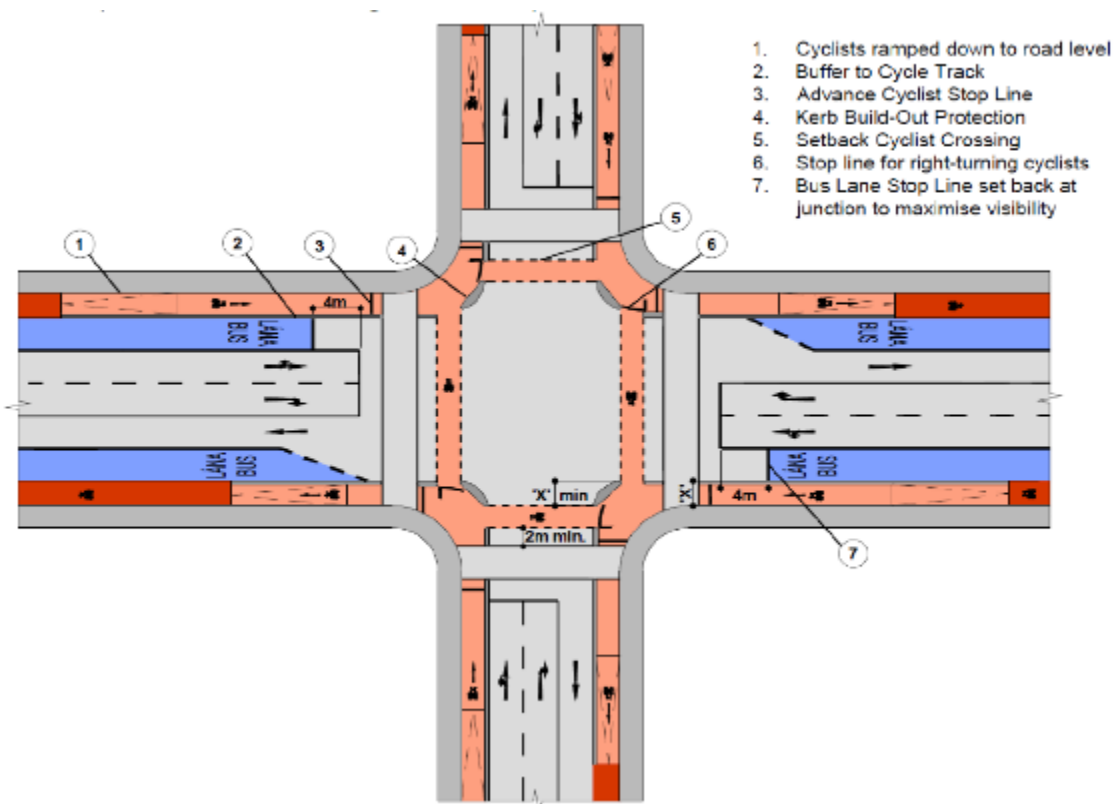


Figure 2.60 Typical Junction Layout from BusConnects Design Guidance Booklet

2 Pedestrian-Cyclist Conflict

Spatial constraints are an important factor in determining any junction design. This is especially the case in urban settings. Where possible, the protected junction has been proposed to be retrofitted into all existing junctions, taking into consideration the best practice from international settings including the Netherlands. The NTA notes the Dublin Cycling Campaign has set out their preference for the 'Dutch style' junction type as described within the submission. There are, however, legislative, behavioural and other practical considerations that need to be taken into account when looking at these international examples. Consideration for all of these elements has led to the development of the four junction types described in the PDGB.

An important consideration during the development of the PDGB was implementation of measures to mitigate pedestrian-cyclist conflict. The 'Dutch-style' junction described in the submission is typical of many junctions in the Netherlands and it allows for a potential un-signalised conflict between pedestrians and cyclists, which depends on a level of courtesy to ensure that collisions are avoided. Following discussions with Irish disability groups, the issue of this potential conflict was raised as a significant concern along the core bus corridors for the visually impaired and for the mobility impaired, based on their members' experiences. Pedestrians are the most vulnerable of road users, and the addition of disability exacerbates this vulnerability. The four junction types within the PDGB have specifically been set out to mitigate these potential conflicts insofar as is reasonably practicable.

Similarly, the layout of the 'dutch style' junctions described in the submission can result in a reduced level of service for pedestrians. The layout of these junctions require multi-movement, sometimes multi-directional, non-continuous crossings for pedestrians, with at least 3 crossing movements (2 x cycle track crossing, 1x carriageway) to cross a side road of a typical junction. The intermediate landing area for pedestrians between the cycle track and carriageway requires a suitably sized holding area for pedestrians to wait before crossing the road. This can require a significant space for urban locations with high pedestrian volumes. Junction types 1-3 in the PDGB aim to consolidate and segregate/confine this waiting area to within the footpath, thus creating a more legible and functional

use of the available space for all users with direct crossing facilities that align to the principles of DMURS.

It is for these reasons that the layout of the 'dutch style' junctions described in the submission have not been adopted for junctions on the Proposed Scheme.

3 Use of Traffic Signals to Yield to Cyclists

The concept of allowing both cyclists and general traffic to proceed together in the same direction is not uncommon and the same traffic signals arrangement also caters for left-turning traffic. In the Netherlands, there are scenarios where the equivalent right-turn movement can be green whilst cyclists are also green. There is, however, an additional requirement to yield to cyclists in this Dutch scenario (see Figure 2.61 below).



Figure 2.61 Example from the Netherlands of traffic signals + give way signage controlling turning traffic and cyclists (Source: Dutch Design Guide Ontwerprijzer Fietsverkeer)

The arrangement depicted above from the Netherlands is beneficial for cyclists in that it minimises delay time but should be subject to design thresholds, which are outlined below. Heavy turning volumes, HGV movements (difficulty with blind spots), high speed environments etc. have been considered during the design of junctions as part of the Proposed Scheme. The PDGB also includes guidance on appropriate signage to be provided to reinforce the requirement for motorists to yield to straight ahead traffic in such locations.

The Dutch themselves have a suite of solutions for different scenarios – no one solution works everywhere. For junctions to operate safely and effectively, it is critical that the control of all movements is considered. All road users can have their own traffic signals at junctions (pedestrians, cyclists, buses, vehicles). To achieve optimum operational efficiency including the efficient movement of cyclists, it is also possible for some movements to occur safely at the same time. To assist with these design decisions, thresholds for turning movements have been used.

Chapter 6 (Page 153) of the Dutch Design Guide Ontwerprijzer Fietsverkeer discourages partial

- Partial conflicts between car and bicycle are strongly discouraged if:
- the volume of the motorized traffic turning exceeds 150 PCU/hour;
 - a bidirectional cycle path is involved, because a proportion of the cyclists will be coming from an unexpected direction;
 - it pertains to a situation outside of built-up areas in which the speeds are higher and cyclists are a less dominant force in the street-scape (as a result of which they are more likely to be missed);
 - a large number of lorries are turning right (due to the probability of a blind spot-related accident);
 - motorized traffic turning left has to cross a large junction (because motorists are no longer expecting any cyclists after the significant distance).

Figure 2.62: Extract from Dutch Design Guide Ontwerprijzer Fietsverkeer

conflicts between cyclists and vehicles if the volume of turning vehicular traffic exceeds 150 PCU²s per hour.

To put the above turning thresholds into context, 150 PCUs per hour equates to approximately 5 cars on average turning per 120 second cycle, or between 3 and 4 cars turning on average per 90 second cycle. The Proposed Scheme also provides other measures such as kerb segregation, advanced position cycle stop lines and early starts for cyclists which will further segregate and reduce the number of interactions between cyclists and vehicles. All these elements form the basis of a typical junction design and operation, thus no one element of a junction design should be considered in isolation.

All junction types as set out in the PDGB have been specifically developed to provide a balanced approach to safety for all modes and in particular to mitigating some of the significant concerns raised by disability advocacy groups for the visually impaired and for the mobility impaired, based on their members' experiences relating to potential uncontrolled conflicts between pedestrians and cyclists. Pedestrians, and in particular vulnerable pedestrians, are at the top of the road user hierarchy as outlined within DMURS. The Proposed Scheme will attract a high volume of pedestrians and cyclists with the proposed infrastructure and urban realm improvements along one of the busiest core bus corridors in the city. As such the protected junction designs proposed within the PDGB serves to improve safety at the junctions, in line with the road user hierarchy.

The submission has raised a specific concern in relation to the concurrent cyclist ahead movement with left turning vehicle traffic (under a flashing amber/give way to cyclists) and the potential for the 'left hook' conflict. As set out above, there are specific infrastructure measures that have been implemented in the design of the junctions to reduce vehicle turning speeds, improve the physical safety, and safety awareness aspects of these junctions. Section 7.1 of the PDGB recognises the importance of providing the infrastructure in line with international best practices as follows:

The primary conflict for cyclists is with left-turning traffic. On the basis of international best practice, the preferred layout for signalised junctions within the CBC project is the "Protected junction", which provides physical kerb build-outs to protect cyclists through the junction.

As noted above in paragraph 3 (Use of Traffic Signals to Yield to Cyclists), the staging and phasing of the junction operation has taken into account the guidance from international expertise in establishing safe thresholds (<150PCU) for implementing the left turning flashing amber/give way to ahead cyclists scenario. 7 of the 27 key junctions on the Proposed Scheme have implemented this approach to achieve optimum operational effectiveness including the efficient movement of cyclists. Introducing separate signal phases will increase delay for cyclists at junctions. This arrangement will promote the sustainable mode hierarchy for cyclists at junctions by providing priority to ahead cyclists over vehicles turning left. At each of these junctions the left turning vehicle traffic volumes in these locations are estimated to be less than the 150PCU threshold and similarly low HGV volumes are estimated in line with the principles established by international guidance. In addition to specific signage such as that presented in Figure 39 and Figure 40 of the PDGB, at each of the 7 locations a three to five second early start for cyclists is typically provided to further mitigate the potential for the number of interactions with vehicles/cyclists at these locations. The Proposed Scheme has also been subject to Road Safety Audits at different stages that have informed the design development of the Proposed Scheme.

Taking on board the added safety measure to avoid pedestrian and cycle conflicts as set out in paragraph 2 (Pedestrian-Cyclist Conflict), the left turning safe threshold (<150PCU's) requirement the Junction Type 1-3 have a higher safety standard for pedestrian and cycle users than the equivalent international options advocated.

² Vehicle to Passenger Car Unit (PCU) conversion as per TfL Values; Pedal Cycle - 0.2, Motor Cycle - 0.4, Passenger Car/LGV - 1.0, Medium Goods Vehicle (MGV/OGV1) - 1.5, Buses and Coaches - 2.0 and Heavy Goods Vehicle (HGV/OGV2) - 2.3

Separately, the NTA and Dublin City Council will continue to promote the already established driver awareness campaign that seeks to promote driver awareness in line with the Road Safety Authority rules of the road as noted below. It is noted that these rules are applicable in DLRCC.

When turning left, or right, all drivers must watch out for cyclists going ahead or turning. When making a turn, watch out for cyclists in front of you or coming up on your left or right. Do not overtake a cyclist as you approach a junction if you are turning left or right, as the cyclist may be continuing straight ahead.

As outlined above, there are, legislative, behavioural and other practical considerations that need to be taken into account when looking at these international examples. Consideration for all of these elements has led to the development of the four junction types described in the PDGB. The PDGB and associated protected junctions have been developed in consideration of the collective principles from international best practice, and in consultation with cycling design experts from the UK, the Netherlands and Denmark for a local Irish context to ensure the safe and effective operation of the junctions, with pedestrian vulnerability as the highest priority.

As outlined above, no two junctions are the same and no one element defines a junction type. The submission has made reference to likening Junction Type 4 to the 'Cyclops' style junction being implemented in the UK. Whilst some of the operational based characteristics of the 'cyclops' style junction are also considered in Junction Type 4 such as parallel and simultaneous pedestrian and cycle movements, there are fundamental differences in these junction types. These fundamental differences relate particularly to pedestrian and cyclists conflicts as described previously.

4 Pedestrian Crossing Distances

As set out in Section 5.6 of the PDGB (Appendix A4.1 of the EIAR) and specifically outlined in the Junction Design Report (Appendix A6.3 of the EIAR) for each junction on the Proposed Scheme, the desirable maximum pedestrian crossing length without providing a refuge island is 19m.

The pedestrian qualitative assessment criteria for junctions is set out in Table 6.3 of the Traffic Impact Assessment Report. This criteria has been derived from a set of industry standards and guidance listed in Section 3 of the Traffic Impact Assessment Report. Of particular note, the Directness criteria aligns to the principles of DMURS and Smarter Travel (2009) which sets out that designs should allow pedestrians to cross the street in a single direct movement where reasonably practical to do so.

Table 6.3: Pedestrian Junction Assessment Criteria

Aspect	Indicator
Routing	Are pedestrian crossings (signalised or uncontrolled) available on all arms?
Directness	Where crossings are available, do they offer direct movements which do not require diversions or staggered crossings i.e., no or little delay required for pedestrians to cross in one direct movement?
Vehicular speeds	Are there measures in place to promote low vehicular speeds, such as minimally sized corner radii and narrow carriageway lane widths?
Accessibility	Where crossings exist, are there adequate tactile paving, dropped kerbs (or raised table treatment) and road markings for pedestrians (including able-bodied, wheelchair users, mobility impaired and pushchairs)?
Widths	Are there adequate footpath and crossing widths in accordance with national standards?

2.4.5.6 Location-Specific Comments

a. Newtown Avenue and Entrance to St. Vincent's Park - Summary of Issue

The submission requests that the cycle lane connect to the Coastal Mobility Route here. The submission asserts that the left exit traffic lane from Newtown Avenue is not needed and should be converted to a 2 way cycle track connecting the two routes.

a. Newtown Avenue and Entrance to St. Vincent's Park – Response to Issue

The comments relating to a connection to the Coastal Mobility Route are noted. As outlined previously, the aim of the Proposed Scheme is to provide enhanced walking, cycling and bus

infrastructure on this key access corridor in the Dublin region, which will enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor. As such, this junction has been designed in accordance with the Preliminary Design Guidance Booklet (PDGB) in Appendix O of the Preliminary Design Report in the Supplementary Information. The primary objective for cycling facilities at this junction has been to provide for high-quality facilities along the main CBC corridor. While it would be desirable to improve all surrounding areas as well, the Proposed Scheme does not have the remit to do so, and it has focussed on the stated aim, to improve facilities along the corridor.

It is noted that the Coastal Mobility Route was delivered as a temporary measure in response to COVID-19. Notwithstanding this, it is possibly likely that future schemes, brought forward either by the relevant local authority or the NTA will address these connections to the Coastal Mobility Route and the Proposed Scheme allows for this to happen at a future date.

b. Vincent's Park/Rockfield Park entrance - Summary of Issue

The submission notes that this entrance will have vehicles directly crossing over people on bikes, and requests that it be redesigned to provide enhanced safety for cyclists from left turning vehicles. It is requested that the small area of private driveway in this location should be acquired.

b. Vincent's Park/Rockfield Park entrance – Response to Issue

The comments relating to this entrance are noted. This is a particularly constrained location, given the existing access arrangement to St. Vincent's Park. This access serves a small number of properties and as such, the volume of traffic expected to be using this access is low. This junction has been improved through the provision of a side road entry treatment as per the PDGB details which will greatly improve safety for pedestrians and cyclists at this junction compared with the existing arrangement.

c. Nutley Lane - Summary of Issue

The submission calls for consideration of a one-way cycle track either side of the full length of Nutley Lane. It notes that a 3.0 wide two-way cycle track is inadequate given that this is a main accessway to UCD. It is also noted that *“stopping the two-way bike lane entirely at the entrance to St. Vincent's Hospital provides too low a quality of service for this very busy route”*. The submission requests that the option of making Nutley Lane one-way for motor traffic be considered.

c. Nutley Lane – Response to Issue

Chapter 3 of the EIAR, Consideration of Reasonable Alternatives, outlines the extensive options assessment exercise which has been undertaken to determine the Preferred Route Option for each section of the Proposed Scheme, including Nutley Lane. In relation to Nutley Lane, from a review of submissions received as part of the first round of non-statutory public consultation for this route, as well as a review of the topographical survey carried out subsequent to the route's publication, a number of issues were identified. The proposed removal of on-street trees and those in front gardens was a significant cause for concern amongst residents. These issues primarily relate to the section of Nutley Lane between the St. Vincent's University Hospital entrance / Nutley Avenue and the Elm Park Golf and Sports Club entrance due to the number of residential properties fronting onto the north-western side of the road, including a number which were proposed to be subject to land acquisition, and the number of on-street trees.

The Emerging Preferred Route (EPR) Option on Nutley Lane consisted of the two general traffic lanes, two bus lanes, two cycle tracks and two footpaths, from the R138 Stillorgan Road junction to the R118 Merrion Road junction. In order to achieve this, the EPR Option design indicated a loss of existing trees and parking along the length of Nutley Lane, as well as potential land take on both sides of the road (including a number of front gardens on the north-west side immediately adjacent to Nutley Avenue).

Consultation on the EPR Option for Nutley Lane highlighted concerns regarding the proposed impact to residential gardens, removal of on-street trees, and a number of safety concerns relating to conflict between vehicles accessing driveways and the users of the footpath, cycle track and bus lane. A number of alternative options were developed and assessed. An option consisting of a one-way route along the entire length of Nutley Lane was not considered feasible due to the presence of St.

Vincent's University Hospital at the northern end of Nutley Lane which would therefore not have two-way access to the entrance on Nutley Lane. As well as this, there is a large number of residents along Nutley Lane and in the vicinity of Nutley Lane that may be significantly negatively impacted by this proposal through limited local access, potential for rat-running on the residential streets, and need for additional traffic management interventions.

As outlined in EIAR Volume 2 Chapter 3 Consideration of Alternatives, a number of feasible route options were developed and assessed. The draft Preferred Route Option was identified as Option NL2, comprising two bus lanes and two traffic lanes along the majority of this section and the two-way cycle track described above. While other options did perform well under many criteria, the expected impacts in relation to Transport Quality & Reliability and Traffic Network Integration were considerably more significant than in the Preferred Route Option. In particular is the likely associated reduction of bus journey time reliability and potential impacts on surrounding residential streets due to local and through traffic detouring onto other streets such as Ailesbury Road and Nutley Road, and beyond, in the options assessed which did not provide full physical bus priority. This option was considered the preferred option as it will provide continuous bus priority and cycle facilities, while also minimising the required tree removal when compared to the EPR Option, and significantly reducing the land acquisition when compared to the EPR Option, and maintaining local access.

The proposed road alignment was revised to retain the existing kerb line on the residential side, and as such, retaining the existing on-street trees along this footpath, and remove the requirement for land acquisition and tree removal in private residential properties on that side of Nutley Lane. In order to minimise the incursion into the properties on the opposite side of the road as a result (SVUH Mortuary, Elm Park Golf and Sports Club), additional design development was carried out. This included delaying the on-set of the proposed southbound bus lane to the south of the St. Vincent's University Hospital entrance, making use of signal controlled priority. In addition, it was determined that no footpath is to be proposed on the south-eastern (Elm Park Golf and Sports Club) side of Nutley Lane over this section from just south of the St. Vincent's University Hospital entrance junction to just north of the Elm Park Golf and Sports Club entrance junction, with dedicated pedestrian crossings provided at both ends. The proposed removal of parking and the fact that there are no private entrances along this section (which would require footpath access) enables the removal of the footpath on this side of Nutley Lane. By combining the two directions of cycle track on Nutley Lane into the proposed 2-way cycle track, less land take is required from the Elm Park Golf and Sports Club than would be necessary if two 2m wide cycle tracks were provided separately on either side of the road. The proposed 2-way cycle tracks has been provided along the Elm Park Golf and Sports Club side of the road to take advantage of the reduced quantum of driveways and access junctions on that side, thus minimising cyclist-motorist conflict. The 2-way cycle track in this location also caters for cycle connectivity between SVUH and UCD.

The final Preferred Route Option for this section of the Proposed Scheme, balances the provision of infrastructure to meet the objectives of the scheme, including bus lanes and cycle tracks, with ensuring that the level of land acquisition proposed is proportional.

d. Ballsbridge - Summary of Issue

The submission notes that the proposed toucan crossing in Ballsbridge will promote conflict with pedestrian as will the northbound contraflow section to Beatty's Avenue. The submission notes that desire lines along the Dodder Greenway must be taken into account.

d. Ballsbridge – Response to Issue

The NTA notes the comments in the submission relation to the proposed toucan crossing in Ballsbridge. It should be noted that the proposed toucan crossing and location of same has been designed following consultation with the design team involved in the Dodder Greenway project. The proposed toucan crossing offers connectivity for the proposed Dodder Greenway facilities between Anglesea Road and Beatty's Avenue. The location of the toucan crossing is between two major junctions and provides for what is also a busy pedestrian desire line in Ballsbridge Village, which caters for a significant quantum of pedestrians during large local sporting and recreational events in the vicinity. Due to its mid-block location, the NTA believe that the toucan crossing is the best solution

for catering for cyclists travelling through Ballsbridge on the Dodder Greenway. The location of the toucan crossing takes account of the need to maintain vehicle access at Beatty's Avenue.

e. **Baggot Street Upper - Summary of Issue**

The submission notes that the bus gate in this location is a great idea and will calm the surrounding environment.

e. **Baggot Street Upper – Response to Issue**

The NTA welcomes this positive feedback in relation to the proposed bus gate on Baggot Street Upper.

2.4.6 24 – Development Applications Unit

2.4.6.1 Overview of submission

The submission outlines heritage related observations/recommendations under the heading of Nature Conservation. The submission notes that the Department's primary concern relates to the potential for pollutants arising from the Construction Stage of the Proposed Scheme having detrimental effects on the Williamstown Creek and Booterstown Marsh of the South Dublin Bay and River Tolka Estuary Special Protection Area (SPA), and the loss of treeline, hedgerows, mixed broadleaved woodlands and scattered trees and parkland habitat along sections of the Proposed Scheme.

The submission refers to the proposal to locate the Construction Compound in the Booterstown Carpark in Blackrock Park. The submission notes that this area lies beside the outlet to Dublin Bay from Williamstown Creek into Booterstown Marsh, both of which are of conservation significance for wintering Special Conservation Interest (SCI) bird species. It is noted that should pollutants enter Dublin Bay through this mechanism, that they could also detrimentally affect SCI bird species in the wider South Dublin Bay and River Tolka Estuary SPA. The submission also notes that the construction of the Proposed Scheme along the Rock Road adjacent to Booterstown Marsh could result in pollution of the marsh with impacts on the SCI bird species and their habitats there.

The submission acknowledges that the Natura Impact Statement (NIS) prepared as part of the application recognises the potential for pollution arising from aforementioned sources, and that various appropriate measures to prevent any pollution arising from the compound or other works associated with the Proposed Scheme are set out in the NIS, the Construction Environmental Management Plan (CEMP), and the Surface Water Management Plan (SWMP) submitted. It is also acknowledged that an Environment Response Incident Response Plan has been prepared to provide mitigation of any accidental spillages. The submission states that if these plans are fully adhered to that any detrimental effect to the SAC should be successfully avoided.

The submission further refers to the proposal to remove 1040m of hedgerows and 4157m of treeline comprising 329 trees as part of the Proposed Scheme, in particular along the boundaries of Blackrock Park and Blackrock College on the Rock Road, and the boundaries of Elm Park Golf Club and RTÉ grounds on Nutley Lane. It is noted that these trees are not of national conservation significance but can be considered of local importance and that the resulting biodiversity loss must be considered.

The submission makes 2 recommendations:

1. That the measures proposed to avoid detrimental effects on the South Dublin Bay and River Tolka Estuary SPA and South Dublin Bay SAC arising from the development of the proposed bus corridor set out in the NIS, CEMP and SWMP submitted in support of the present application shall be implemented in full.

Reason: To avoid the proposed bus corridor detrimentally affecting SCI bird species and Qualifying Habitats for which the South Dublin Bay European sites are designated under the Birds and Habitats Directives.

2. That no removal of trees or vegetation shall occur during the main bird breeding season from March to August inclusive.

Reason: To avoid the destruction of bird nests, eggs and nestlings.

Finally, the submission recommends that in the interest of protecting local biodiversity, the applicant should be required to review the proposed removal of trees and hedgerows as part of the Proposed Scheme, to determine whether such removals are necessary and in the case of large mature specimen trees is found to be necessary, it should be considered, where feasible, transplanting such trees to sites immediately adjacent to the present locations.

2.4.6.2 Response to submission

The NTA welcomes the engagement of the Department in relation to these important matters of nature conservation. As highlighted in the submission, the NTA has extensively considered the potential of the Proposed Scheme to impact on adjacent sensitive receptors, and has outlined a number of mitigation measures which addresses these risks in the EIAR, the NIS and other supporting documentation.

In relation to the potential for impacts on the Booterstown Marsh and Williamstown Creek, Table 5.2 of the Construction Environmental Management Plan (CEMP) summarises the Construction Phase mitigation measures which the appointed contractor will be required to implement. A number of these mitigation measures, namely WT1, WT2, WT3, WT4, BD21 and BD22, specifically relate to mitigating construction stage impacts on Booterstown Marsh and Williamstown Creek. The mitigation measures include a range of elements such requirements around storage of fuel and other materials, control measures to protect surface water drains from silty runoff, use of silt fences, ground investigation to determine if contamination is present etc.

Section 5.4.4.1 of the CEMP provides further detail relating to the proposed Construction Compound and additional measures which will be required by the Contractor appointed to deliver the Proposed Scheme. Section 5.4.4.2 further details additional measures to protect the Booterstown Marsh. As noted in the CEMP, the NTA shall set out the Employer's Requirements in the Construction Contract including all applicable mitigation measures identified in the EIAR, as well as additional measures required pursuant to conditions attached to any decision to grant approval.

In relation to the impacts on existing trees and vegetation, this specific issue is addressed in EIAR Chapter 12 Biodiversity Section 12.5.1.5.1 Breeding Birds. Under the sub-title Mortality Risk, it sets out that, where feasible, vegetation (e.g. hedgerows, trees, scrub, bankside vegetation and grassland) will not be removed, between the 1st March and the 31st August, to avoid direct impacts on nesting birds. Where the construction programme does not allow this seasonal restriction to be observed, then these areas will be inspected by a suitably qualified ecologist as engaged by the appointed contractor for the presence of breeding birds prior to clearance. Areas found not to contain nests will be cleared within 3 days of the nest survey, otherwise repeat surveys will be required. Vegetation clearance will not commence where nests are present, works will resume when birds have fledged and nests are no longer in use, or an agreement is reached with National Parks and Wildlife Service (NPWS).

In relation to the request to review the requirement to remove trees as part of the Proposed Scheme, the NTA has carried out an exhaustive exercise in determining the trees and vegetation which are required to be removed to facilitate the Proposed Scheme. It is noted that throughout development of the scheme design, the retention of trees along the route has been a key consideration. This is demonstrated through changes to the original design presented at the Emerging Preferred Route Stage which would have resulted in significant tree loss, for example along Pembroke Road and Merrion Road. The subsequent iterations of the scheme design in both of these areas resulted in a reduced cross-section that still met the objectives of the scheme and allowed the retention of a large number of mature trees.

EIAR Volume 4 Part 2 Chapter 17 provides the Arboricultural Impact Assessment Report, which includes detailed drawings showing all trees that are to be removed. As summarised in Table 4 of that report, a total of 329 trees will be removed to facilitate the scheme. However, as stated in section 17.4.4.2.9 of Chapter 17, there will be substantial replanting of trees as part of the Proposed Scheme.

As stated in section 12.5.1.2.1 of Chapter 5, 349 street trees will be planted throughout the scheme resulting in a net increase of 20 trees.

The trees identified for removal in the Arboricultural Impact Assessment Report (AIAR) are only those which are required to be removed to facilitate the Proposed Scheme. In relation to the suggestion that the NTA should consider transplanting specific mature trees where possible, the NTA has considered this option, but determined that it would not be feasible along the scheme.

2.4.7 28 – Dublin City Council

Dublin City Council's (DCC) submission comprises 37 pages and is sectionalised numerically. For ease of reference the DCC section numbering and sub-section numbering conventions have been retained throughout the NTA's response as set out in the following paragraphs.

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

- A. Role of NTA & Liaison
- B. DCC's Support for the Scheme
- C. Certain Observations Raised/Clarification Sought by DCC
 - C1 – Response to Section 2.1 Relevant Planning History
 - C2 – Response to Section 2.2 Policy Context
 - C3 – Response to Section 2.3 Departmental Reports, including reference to the Appendix
 - C4 – Response to Section 2.4 Planning Assessment (sub-sections 2.4.1 to 2.4.12)
 - C5 – Response to Section 2.5 Conclusion
 - C6 – Response to Appendix to DCC Submission

2.4.7.1 Introduction

The Belfield / Blackrock to City Centre Core Bus Corridor Scheme (hereinafter referred to as the "Proposed Scheme") within the Dublin City Council area is one of 12 schemes to be delivered under the BusConnects Dublin - Core Bus Corridors Infrastructure Works (hereinafter referred to as the "CBC Infrastructure Works"). The CBC Infrastructure Works is one of the initiatives within the NTA's overall BusConnects Programme.

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

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

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

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

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

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

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

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

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

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

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

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

2.4.7.3 B - DCC's support for the Scheme

In its submission, DCC confirms its support for the Proposed Scheme, and state in their conclusion on page 29 of the submission:

“The Belfield / Blackrock to City Centre Core Bus Corridor Scheme is supported and welcomed by Dublin City Council as it will ensure the delivery of a number of key policies and objectives of the Dublin City Development Plan 2016-2022 as well as the draft Dublin City Development Plan 2022-2028.”

DCC further confirms (at page 29 of its submission) that the development of the Proposed Scheme will provide an upgraded and expanded bus network and quality of service together with better quality cycling and pedestrian facilities and DCC acknowledges that these improvements will make it easier for people to access and use public transport. It also acknowledges that the Proposed Scheme will, in turn, promote modal shift from the private car to more sustainable forms of transport including walking, cycling and public transport, ultimately contributing to the creation of a greener and more sustainable city.

In relation to planning policy, the NTA welcomes the acknowledgement by DCC (at page 10 of its submission) that, in terms of Regional Policy, the Proposed Scheme is supported by the Regional Spatial and Economic Strategy (RSES) and that DCC is of the view that the Proposed Scheme will contribute to, and support, continued improved integration of transport with land use planning and the delivery of improved high-capacity Core Bus Corridors will enable and support the delivery of both residential and economic development opportunities, facilitating the sustainable growth of Dublin City and its metropolitan area, not only seeking an improved and enhanced bus network but also places cycling at the core of its transport objectives.

In relation to the Dublin City Development Plan 2016-2022, the DCC submission (page 6) confirms that the development plan: *“recognises the need for an efficient, integrated, and coherent transport network as a critical component of the Development Plan’s Core Strategy”*. It goes on to state: *“[t]he City Council supports the improvement of public transport and cycling which will allow for higher density development, thereby creating a more sustainable interaction between land-use and transport.”*

Equally, on page 14 of its submission, DCC notes that the Proposed Scheme will help to achieve the strategic objectives envisaged in the forthcoming Dublin City Development Plan 2022-2028 pertaining to: compact growth; sustainable mobility and permeability; and place making, while significantly contributing towards climate action.

In relation to the EIAR, DCC states (at page 10 of its submission) that: *“A comprehensive EIAR has been submitted with the application examining the project under all relevant headings and finds generally that the development would not adversely impact on existing environmental amenities”* and they go on to say, on page 11, that *“the content [of the EIAR] points generally to the development having negligible impact on the existing environment”*.

In relation to the NIS, DCC states (at page 11 of its submission) that the Natura Impact Statement submitted is generally satisfactory in terms of identifying the relevant European sites and the potential adverse impacts on the integrity of designated European sites along the Dublin coastline in view of their conservation objectives. DCC go on to state in its submission that: *“the proposed avoidance, design requirements and mitigation measures set out in the NIS will ensure that any impacts on the conservation objectives of European Sites will be avoided during the construction and operation of the proposed scheme such there will be no adverse effects on any European Sites.”*

DCC also observes that: *“Whilst An Bord Pleanála is the competent authority for the purposes of carrying out an Appropriate Assessment of the proposed scheme, it is noted that the Natura Impact Statement objectively concludes, following an examination, analysis and evaluation of the relevant information, including in particular the nature of the predicted impacts from the proposed scheme, and subject to the implementation of the identified mitigation measures, that the proposed scheme will not adversely affect (either directly or indirectly) the integrity of any European Site, either alone or in combination with other plans or projects.”*

In relation to zoning, the NTA notes that DCC sets out the view on page 13 of its submission that, Public service installations are compatible with the Z1, Z2, Z3, Z4, Z6, Z9 and Z15 zones along the Proposed Scheme.

On page 13 of its submission, in relation to amenities, DCC states: *“Dublin City Council is satisfied that the elements of the proposed scheme which fall within the administrative area of the Council would not have any adverse or undue impact on the amenities of adjoining properties or the wider area”*.

In fact, DCC goes on to state (at page 14): *“Once complete, the proposed scheme will provide for an attractive, safe and universally accessible public realm alongside the core bus and cycle facilities which will enhance the amenities of the area and provide for a more efficient urban transport network. The proposed public realm enhancements at Ballsbridge Village and Baggot Street Upper are welcomed.”*

The Environmental and Transportation Department of DCC set out (at page 14 of its submission) that: *“The Department is generally supportive of the improvements to bus and cycling infrastructure proposed in the overall context of encouraging a shift to sustainable mobility. In this regard the proposal generally aligns with the policies expressed in the Dublin City current and draft Development Plans”*.

DCC states further that, *“[t]he commitment by the NTA within the BusConnects project to increase the level of priority afforded to the bus service is very much welcomed. The introduction of, for the most part, separated and segregated cycle ways is again welcomed”*. Dublin City Council goes on to state that this will provide better and safer cycling environment and help the bus maintain a steady speed and achieve its journey times.

Also, on page 14 of its submission, DCC states: *“The Traffic Department is supportive of the integrated sustainable transport proposals and recognises the significant improvements that they will bring in terms of safe cycling measures and in enabling an efficient public transportation service along these routes”*.

On page 16 of the DCC submission, the Roads Department states: *“The BusConnects project seeks to radically improve bus and cycling infrastructure which is welcomed”*.

At page 21 of its submission, DCC Archaeology Department states: *“The Archaeology Section of Dublin City Council supports the proposed assessment and mitigation measures proposed in the EIAR”*

On page 26 of the DCC submission, the City Architects Department welcomes in principle the objectives of the Proposed Scheme to support integrated sustainable transport use through infrastructure improvements for active travel (both walking and cycling), and the provision of enhanced bus priority measures. It goes on to state that the Proposed Scheme will facilitate the modal shift from car dependency through the provision of walking, cycle, and bus infrastructure enhancements thereby contributing to an efficient, integrated transport system and facilitating a shift to a low carbon and climate resilient City. This Department also notes that proposals for public realm upgrades, including widened footpaths, high quality hard and soft landscaping contribute towards a safer, more attractive environment for pedestrians, are included, and that the Scheme has been developed having regard to relevant accessibility guidance and universal design principles so as to provide access for all users.

2.4.7.4 C - Certain Observations Raised/Clarification Sought by DCC

While, as is evidenced from the DCC submission itself, and from the extracts from the DCC submission as outlined above in section B - DCC's support for the Scheme, DCC is supportive of the Proposed Scheme and its improvements to public transport and the shift to sustainable mobility, DCC has also raised certain queries and observations that the NTA has now considered and responds to below.

These queries and observations are enclosed in section 2.0 of the DCC submission, (entitled “Description of the Proposed Development”). The queries and observations are included under a number of sub-headings and for ease of reference the DCC sub-section numbering convention has been retained throughout the following paragraphs.

2.0 Description of the Proposed Development

Section 2.1 Relevant Planning History

C1 - Response to Section 2.1

DCC, in this section 2.1 of its submission, lists 12 planning applications along, and adjacent to, the Proposed Scheme. The NTA notes that 9 of the 12 planning applications listed are identified in the application documentation – namely EIAR Volume 4 Appendices Part 1 of 2, 04. A2.1 Appendix 2 Planning Report, Table 2.1 as set out below:

- **Maldron Hotel and Tara View (site of former Tara Towers Hotel);** Permission granted for 140 no. bedroom hotel and apartment block (reg. ref. 3608/17).
- **Elmpark Green Business Campus;** Permission granted for 73 no. apartments in a block to rear (west) of campus (reg. ref. 3743/19 & ABP 307424/20).
- **Former Gowan Motors Compound Site (169-177 Merrion Road);** Permission granted for apartment development containing 46 no. units (reg. ref. 4477/19 and ABP ref. 307591-20, as amended by reg. ref. 4051/21).
- **Former Gowan Motors Site (133-145 Merrion Road);** Permission granted for apartment development (63 no. units).
- **Former AIB Banks Centre Site;** Permission granted for 2 no. office buildings fronting Merrion Road (reg. ref. 2064/19 and ABP PL29S.246717).
- **Jury's and Berkely Court Hotel Site;** Ten year planning permission granted for demolition of Jury's Hotel and Berkely Court Hotel and construction of a mixed-use development (568 no.

apartments and 9,805sq.m of commercial uses (reg. ref. 4015/09 and ABP PL29S.237454)> Lifetime of permission has been extended under reg. ref. 4015/09x1.

- **Hume House (128-138 Pembroke Road);** Permission granted for replacement office building (reg. ref. 4155/18 and ABP-303806019).
- **74-75 Baggot Street Lower;** Permission granted for replacement office building at junction of Baggot Street Lower and Wilton Terrace (reg. ref. 4166/16 and ABP PL29S.248884).
- **ESB Headquarters;** Permission granted for redevelopment of ESB Headquarters (reg. ref. 3052/14 and ABP PL29S.244492) including demolition and replacement of all 20th Century office facilities and renovation and reuse of Georgian house.

The three other planning applications that DCC refer to are:

- **St. Vincent's University Hospital;** Ten-year permission granted for Strategic Infrastructure Development primarily comprising new national maternity hospital at St. Vincent's University Hospital (ref. Part X/0018).
- **20 Merrion Road;** Permission granted for replacement office building (Glencar House) and restaurant at No. 20 Merrion Road (reg. ref. 4120/21).
- **Carrisbrook House 122 Northumberland Road);** Council decision to grant permission for replacement office building with ground floor commercial uses (reg. ref. 4120/21) under appeal to An Bord Pleanála (ABP ref. 313812).

The NTA confirms its awareness of these three planning permissions, which have been taken into account in the development of the Proposed Scheme. For example, in the case of the new national maternity hospital at St. Vincent's University Hospital, the granted planning permission included for a new right turn lane from Nutley Lane to the hospital campus - this right turn lane has been incorporated in the Proposed Scheme design.

It should be noted that from a Traffic / Transportation, Air, Noise, etc. perspective, individual developments are generally not utilised in the assessment processes and, instead, general growth and major infrastructural development are appropriately considered and evaluated. The planning data which underpins the traffic modelling for the Proposed Scheme has been derived from the National Development Forecasting Model which accounts for the growth in population and employment across the GDA at an aggregate level for the assessment years 2028 and 2043. This growth is informed by regional growth projections and local development planning data.

St. Vincent's University Hospital (SVUH) is a modelling zone in and of itself due to its size. For the Proposed Scheme, growth is assumed for the National Maternity Hospital (NMH) in both 2028 and 2043, with an employment growth increase of approximately 400 and 700 assumed by 2028 and 2043 respectively.

The DCC submission also notes 7 permitted structures within the public road, as set out below:

- Permission granted for refurbishment of existing kiosk previously containing coffee shop on traffic island at junction of Pembroke Road and Northumberland Road (Reg. ref. 4385/17).
- Permission granted for free-standing digital advertising structure to front of SPAR on Baggot Street Upper (reg. ref. WEB1460/17).
- Permission granted for replacement of bus shelters incorporating digital advertising in public footpath on either side of Baggot Street Upper (reg. ref. WEB1416/18 and WEB1417/18).
- Part 8 proposed for double sided metropole advertising structure on traffic island at junction of Pembroke Road and Herbert Road (reg. 2975/16) approved.
- Permission granted for replacement bus shelters incorporating advertising panels to front of 54 Merrion Road, the Clayton Hotel, Merrion Shopping Centre (reg. ref. WEB1421/18, WEB1419/18 and WEB1420/18).
- Permission granted for replacement telephone kiosk incorporating information and advertising panels in public footpath adjoining St. Vincent's University Hospital (4384/19).
- Part 8 proposal for metropole in public footpath to front of Caritas Convalescent Centre approved (reg. ref. 2804/10).

The majority of the above permitted structures have been installed/constructed. For those that have yet to be installed/constructed (for example, refurbishment of existing kiosk at junction of Pembroke Road and Northumberland Road - Reg. ref. 4385/17), these proposals can be accommodated within the Proposed Scheme as submitted and the NTA will continue to liaise closely with all relevant Stakeholders in order to ensure that their requirements are met within the context of the Proposed Scheme.

Section 2.2 Policy Context

C2 - Response to Section 2.2

The NTA acknowledges the commentary in section 2.2 of the DCC Submission in relation to Policy Context and notes that it generally aligns with the policy context set out within the application documents namely EIAR Volume 4 Appendices Part 1 of 2, 01. A2.1 Report Planning Report for the Proposed Scheme.

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

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

Section 2.3 Departmental Reports (including reference to the Appendix):

C3 - Response to Section 2.3

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

Section 2.4 Planning Assessment

C4 - Response to Section 2.4

2.4.1. Planning Policy

Response to Section 2.4.1:

Note this is responded to in Section 2.2 above.

2.4.2. Environmental Impact Assessment Report (EIAR)

Response to Section 2.4.2:

In relation to the EIAR, DCC states (at page 10 of its submission) that "[a] comprehensive EIAR has been submitted with the application examining the project under all relevant headings and finds generally that the development would not adversely impact on existing environmental amenities" and they go on to say, on page 11, that "the content [of the EIAR] points generally to the development having negligible impact on the existing environment".

2.4.3. Natura 2000

Response to Section 2.4.3:

In relation to the NIS, DCC states (at page 11 of its submission) that the Natura Impact Statement submitted is generally satisfactory in terms of identifying the relevant European sites and the potential

adverse impacts on the integrity of designated European sites along the Dublin coastline in view of their conservation objectives. DCC go on to state in its submission that: *“the proposed avoidance, design requirements and mitigation measures set out in the NIS will ensure that any impacts on the conservation objectives of European Sites will be avoided during the construction and operation of the proposed scheme such there will be no adverse effects on any European Sites.”*

DCC also observes that: *“Whilst An Bord Pleanála is the competent authority for the purposes of carrying out an Appropriate Assessment of the proposed scheme, it is noted that the Natura Impact Statement objectively concludes, following an examination, analysis and evaluation of the relevant information, including in particular the nature of the predicted impacts from the proposed scheme, and subject to the implementation of the identified mitigation measures, that the proposed scheme will not adversely affect (either directly or indirectly) the integrity of any European Site, either alone or in combination with other plans or projects.”*

2.4.4. Zoning and other designations

Response to Section 2.4.4:

In relation to zoning, the NTA notes that DCC sets out the view on page 13 of its submission that, Public service installations are compatible with the Z1, Z2, Z3, Z4, Z6, Z9 and Z15 zones along the Proposed scheme.

2.4.5. Impact on amenity

Response to Section 2.4.5:

On page 13 of its submission, in relation to amenities, DCC states: *“Dublin City Council is satisfied that the elements of the proposed scheme which fall within the administrative area of the Council would not have any adverse or undue impact on the amenities of adjoining properties or the wider area”*.

In fact, DCC goes on to state (at page 14): *“Once complete, the proposed scheme will provide for an attractive, safe and universally accessible public realm alongside the core bus and cycle facilities which will enhance the amenities of the area and provide for a more efficient urban transport network. The proposed public realm enhancements at Ballsbridge Village and Baggot Street Upper are welcomed.”*

2.4.6. Strategic Observation from the Forward Planning Department of Dublin City Council

Response to Section 2.4.6:

The DCC submission states that the Proposed Scheme will help to achieve the strategic objectives envisaged in the forthcoming Dublin City Development Plan 2022-2028 pertaining to: compact growth; sustainable mobility and permeability; and place making, while significantly contributing towards climate action. DCC further note that while the Scheme is supported, it is important that the Core Bus Corridor adequately addressed conservation impacts along the route. The NTA note this comment. In general, the EIAR addresses conservation impacts within EIAR Volume 2 Chapter 15 Archaeological and Cultural Heritage, Chapter 16 Architectural Heritage and Chapter 17 Landscape (Townscape) and Visual. Specific conservation related comments are responded to in Section 2.4.9 below.

2.4.7. Environment and Transportation Department Comments

Response to Section 2.4.7 General Comments:

The Environmental and Transportation Department of DCC sets out (at page 14 of its submission) that:

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

DCC states further that:

“[t]he commitment by the NTA within the BusConnects project to increase the level of priority afforded to the bus service is very much welcomed. The introduction of, for the most part, separated and segregated cycle ways is again welcomed”.

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

Response to Section 2.4.7.1. Traffic Department (including reference to the Appendix):

On page 14 of its submission, DCC states:

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

DCC’s Traffic Department acknowledges that the modelling work, which was carried out on the corridor of the real-life operation of a full corridor management system using an adaptive traffic control system, allows for a firm basis for how the corridor can be evaluated and to determine its benefits. As set out in the EIAR Volume 2 - Main Chapters - Section 6.4.6.3 of Chapter 6 Traffic and Transport, the micro-simulation modelling demonstrates that bus journey times will improve by between 16% and 18% during the AM and PM Peak hours of the 2028 Opening and 2043 Design Year. On an annual basis this equates to 6,200 hours of bus vehicle savings in 2028 and 5,700 hours in 2043.

Similarly, bus network resilience is a key performance criteria as set out in the EIAR Section 6.4.6.2.7.2 of Chapter 6 Traffic and Transport wherein the Proposed Scheme was tested with an additional 10 buses per hour (from 45 to 55) at the busiest section. As can be seen from Table 6.63 and Diagram 6.25 of the above referenced chapter, the results indicate that a high level of journey time reliability is maintained. This highlights the benefit that the Proposed Scheme infrastructure improvements can provide in protecting bus journey time reliability and consistency, as passenger demand continues to grow into the future.

The approach to incorporating the SCATS (Sydney Coordinated Adaptive Traffic System) bus priority measures is set out in Section 4.11 and Section 12.5.3 of the Preliminary Design Report in the Supplementary Information. Through the very positive and constructive liaison with the DCC BusConnects Liaison Office throughout the design and planning process, DCC’s Traffic Department is confirming that DCC will utilise its adaptive traffic control system SCATS to undertake the required traffic management on the corridor to enable the public transport corridor to perform as per the requirements.

Because of the use of a real-world system which has multiple inputs from the Bus AVL system, cycle and pedestrian detection as well as vehicle actuated sensors, the signals will be running multiple sets of timings across the day rather than a fixed set of timings and the use of this technology will facilitate improved corridor operation. This digital infrastructure along with the proposed civil infrastructure combine for the Proposed Scheme to meet its objectives.

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

The NTA notes the comment from DCC’s Traffic department that the use of Bus Gates and Queue Relocation along Merrion Road, Pembroke Road to compensate for the lack of continuous bus lanes along both sides of Merrion Road provide challenges for how the corridor will be managed during operation. DCC further note that the enhanced data garnered by DCC from the next Generation AVL system and the next generation Bus priority system currently being specified will play a key role in how the corridor is dynamically managed to ensure that the bus journey times and headways are met. The signal controlled priority proposed in this section provides bus priority through this section while significantly reducing the number of trees required to be removed, and the amount of land acquisition necessary relative to the Emerging Preferred Route Option which consisted of bus lanes in each direction through this section. The bus priority measures proposed in this Section of the Proposed Scheme will enable the objectives of the Proposed Scheme to be met while minimising the residual

environmental impacts on the area and welcomes DCCs comments in relation to the ever-improving dynamic traffic management systems..

It is also noted that DCC makes reference to the fact that the junction design at the junction of Strand Road and Merrion Road (Merrion Gates) allows for a connection at some point to a potential Strand Road cycle scheme and that this is welcomed by DCC. The NTA acknowledge this positive feedback. The submission further notes: *“As the junction is integrated with the Irish Rail infrastructure in terms of operation, during the detail design process the exact interface with the Irish Rail system and the location of infrastructure will have to be carefully assessed.”* This comment is noted. The Proposed Scheme as submitted caters for all those travelling through the junction, including Irish Rail. The NTA will continue to liaise with Irish Rail.

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

2.4.7.2. Roads Department

Response to Section 2.4.7.2 (including reference to the Appendix):

Movement Hierarchy

In regard to Movement Hierarchy, the Proposed Scheme pedestrian-movement initiatives are following best-practice and are enhancing the facilities for pedestrians / users with disabilities. As referenced in the EIAR section 3.2.3 of the Traffic Impact Assessment Report (Volume 4 Appendices Part 1 of 2, 01. A6.1 Transport Impact Assessment Report), the recently published National Investment Framework for Transport in Ireland (NIFTI) sets out a hierarchy of travel modes to be accommodated and encouraged when investments and other interventions are made. Sustainable modes, starting with active travel (walking, wheeling and cycling) and then public transport, will be encouraged over less sustainable modes such as the private car. This aligns with the core objectives of the Proposed Scheme. It is noted that Section 3.2.3 of the Traffic Impact Assessment Report (Volume 4 Appendices Part 1 of 2, A6.1 Transport Impact Assessment Report) refers to the Draft National Investment Framework for Transport in Ireland (NIFTI) (2021), however, this policy was finalised and published on 21 December 2021. It is therefore clarified that this reference should be to the final National Investment Framework for Transport in Ireland (NIFTI) (2021).

As set out in the EIAR Volume 2 - Main Chapters, Diagram 6.1 and Diagram 6.3 of Chapter 6 Traffic & Transport, 'People Movement' is a key design philosophy that underpins the objectives of the Proposed Scheme. As such, a multifaceted approach has been undertaken to assess the people movement throughout the Proposed Scheme. Section 3.2.5 of the Traffic Impact Assessment Report and Section 5.4.4.2 and Appendix A6.3 Junction Design Report (Volume 4 Appendices Part 1 of 2) demonstrate that each junction along the Proposed Scheme has been designed to be consistent with the National Cycle Policy Framework to accommodate a minimum 10% cycle mode share in terms of people movement capacity at each junction. This assessment also quantifies the theoretical people movement capacity by walking, bus, and car at each junction.

Diagram 6.7 of Chapter 6, conveys the positive impact that the Proposed Scheme has on modal share in the direct study area as a result of its implementation, using the weighted average number of people moved by each mode (Car, Bus, Active Modes). The NTA Eastern Regional Model (ERM) and Local Area Model (LAM) modelling indicates a corridor level reduction of 50% in the number of people travelling by car, an increase of 100% in the number of people travelling by bus and an increase of 67% in people walking or cycling along the Proposed Scheme during the 2028 AM Peak Hour assessment.

Similarly Diagram 6.8 of Chapter 6 indicates a reduction of 55% in the number of people travelling by car, an increase of 145% in the number of people travelling by bus and an increase in 67% in the

number of people walking or cycling along the Proposed Scheme during the 2028 PM Peak Hour assessment.

Ensuring Pedestrian Priority

With regard to ensuring Pedestrian Priority, additional physical interventions along the Proposed Scheme, such as enhanced/additional pedestrian crossings, raised table side entry treatments, and enhanced cycling infrastructure, have been assessed in the EIAR (Volume 4 Appendices Part 1 of 2, Chapter 6 Traffic and Transport Appendices) Appendix 4 and summarised in Section 8 of the Traffic Impact Assessment Report and Section 6.4.6.1.7 of the Volume 2 - Main Chapters Chapter 6 Traffic & Transport. These interventions, which form part of the Proposed Scheme, further enhance the movement hierarchy emphasis in line with the Proposed Scheme Objectives.

The Proposed Scheme will increase the number of controlled pedestrian crossings from 68 in the Do Minimum to 96 in the Do Something scenario, equating to a 41% increase. Additionally, there will be an increase in the number of raised table crossings on side roads from 9 in the Do Minimum to 55 in the Do Something scenario, equating to a 511% increase. It is further noted that the Proposed Scheme proposes to increase footpath widths at critical locations with high pedestrian demand, such as within Ballsbridge Village, on Pembroke Road, on Baggot Street Upper and on MacCartney Bridge.

The NTA welcomes DCC's comments in relation to the importance of considering the pedestrian/cyclist interaction at bus stops and notes that the EIAR Chapter 4, Proposed Scheme Description Appendix A4.1_ Preliminary Design Guidance Booklet (PDGB) for BusConnects Core Bus Corridor Section 11, sets out the key measures to address the concerns raised in relation to vulnerable users at these locations which is further elaborated in Section 4.14 of the Preliminary Design Report in the Supplementary Information. These details were developed as a result of direct consultation between the NTA and representative mobility groups.

These measures will reduce the potential for conflict between pedestrians, cyclists and stopping buses by deflecting cyclists behind the bus stop, thus creating an island area for boarding and alighting passengers. On approach to the bus stop island the cycle track is intentionally narrowed with yellow bar markings also used to promote a low-speed single file cycling arrangement on approach to the bus stop. Similarly, a 1 in 1.5 typical cycle track deflection is implemented on the approach to the island to reduce speeds for cyclists on approach to the controlled pedestrian crossing point on the island. To address the potential pedestrian/cyclist conflict, a pedestrian priority crossing point is provided for pedestrians accessing the bus stop island area. At these locations a 'nested Pelican' sequence similar to what has been provided on the Grand Canal Cycle Route will be introduced so that visually impaired or partially sighted pedestrians may call for a fixed green signal when necessary and the cycle signal will change to red. Where the pedestrian call button has not been actuated the cyclists will be given a flashing amber signal to enforce the requirement to give way to passing pedestrians. A 1:20 ramp is provided on the cycle track to raise the cycle track to the level of the footpath/island area onto a wide crossing. Suitable tactile paving is also provided at the crossing point in addition to a series of LED warning studs provided at the crossing location which are actuated by bus detector loops in the bus lane. The exit taper for the bus stop has been nominated at 1 in 3 to provide for a gradual transition to the cycle track.

Similarly, section 6 of the PDGB sets out the key design measures considered for on street parking interactions. Where parallel parking spaces are provided alongside a cycle track, a buffer must be provided to allow space for opening car doors. This buffer should be a minimum of 0.75m in width. (The buffer strip may encroach into the cycle track with localised narrowing where space is confined subject to a minimum 1.5m clear width). Examples where buffer strips have been included in the Proposed Scheme are provided on the General Arrangement Plans including the following locations:

- Chainage A1700 - outbound on street parking and loading bay on Rock Road
- Chainage A1850 – outbound on street parking on Rock Road
- Chainage A2450 – A2600 – revised parking arrangement on Rock Road between Booterstown Avenue and St. Helen's Road
- Chainage A3375 – outbound on street parking on Merrion Road south of Merrion Gates

- Chainage A3500 – revised outbound on street parking on Merrion Road north of Merrion Gates
- Chainage A5675 – outbound loading bay and disabled bay in Ballsbridge Village
- Chainage A5800 – revised parking arrangement on Shelbourne Road
- Chainage A6240 – A6375 – revised parking arrangement on southern side of Pembroke Road
- Chainage A6240 – A6650 – revised parking arrangement on northern side of Pembroke Road
- Chainage A6775 – revised parking arrangement on southern side of Baggot Street Upper
- Chainage A6800 – revised parking arrangement on northern side of Baggot Street Upper
- Chainage A7100 – revised parking arrangement on southern side of Baggot Street Lower
- Chainage A7125 - A7200 – revised parking arrangement on northern side of Baggot Street Lower

Awareness, Education and Behavioural Change Programme

The NTA notes DCC's request for an Awareness, Education and Behavioural Change Programme in the context of the Proposed Scheme. The aim and objectives of the Proposed Scheme is to provide enhanced walking, cycling and bus infrastructure on this key access corridor in the Dublin region, which will enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor (Reference Chapter 1 Introduction, Section 1.2 Aim and Objectives, of the Belfield / Blackrock to City Centre Core Bus Corridor Scheme Environmental Impact Assessment Report, Volume 2 of 4).

The aim and objectives are not unique to the CBC Infrastructure Works and many Active Travel projects are currently progressing similar infrastructure upgrades across most, if not all, local authority jurisdictions.

The need for a communications programme related to sustainable transport promotion is outside the scope of a singular project and would, instead, be likely to have a national or regional focus. It can be noted that the Draft Greater Dublin Area Transport Strategy 2022-2042, referenced in Section 2.3.4.3 of Chapter 2 (Need for Proposed Scheme) of the Belfield / Blackrock to City Centre Core Bus Corridor Scheme EIAR, Volume 2 of 4, sets out behavioural change measures that are intended to be implemented across the GDA, including sustainable transport initiatives, residential travel planning and the expansion of Smarter Travel Workplaces and Campuses Programme plus the Green Schools Programme. These commitments reflect measures already contained in the current Transport Strategy for the Greater Dublin Area 2016 – 2035 and in other national policies. The NTA anticipates undertaking these measures, in co-operation with DCC, and other local authorities, which will deliver the awareness, education and behavioural change programme suggested by DCC.

Impact on Loading and Servicing

The NTA notes DCC's comments in relation to Impact on Loading and Servicing and the challenge to balance a wide range of competing demands with public transport, pedestrians, cyclists, the private car and the functional and servicing needs of the city economy whilst ensuring the city remains a vibrant, attractive and accessible area for all.

This challenge directly correlates to the Proposed Scheme objectives as set out in Section 1.2 of Chapter 1. The 15-Minute City policy QHSN10 set out in Chapter of 5 of the forthcoming Draft Dublin City Development Plan 2022-2028 is also supported by the Proposed Scheme objectives. Movement of people is a core design philosophy of the Proposed Scheme as described in the EIAR Volume 2 - Main Chapters, Chapter 6 Traffic & Transport, which is centred around positioning active modes and public transport at the top of the modal hierarchy, in line with the principles of the National Investment Framework for Transport in Ireland (NIFTI). Improvements to the urban realm, pedestrian and cycle infrastructure between urban centres and neighbourhoods along Proposed Scheme including Blackrock, Ballsbridge and Baggot Street Upper benefit from the 15-Minute City principles.

The assessment of impacts on loading and parking for the Proposed Scheme is set out in the EIAR Chapter 6 Traffic and Transport, Appendix A6 Traffic Impact Assessment Report and summarized in Chapter 4 Proposed Scheme Description and Chapter 10 Population.

Section 6.4.6.1.7.4 of Chapter 6 summarizes the changes to the parking and loading provisions as a result of the Proposed Scheme. This will result in impacts on commercial and residential parking in this area which are reported in the above referenced section as follows:

“Total parking provision will be reduced by 165 spaces along the Proposed Scheme, which equates to a 12% reduction approximately.

Aspects of the Proposed Scheme and network proposals are expected to mitigate the reduction in parking by reducing reliance on private cars due to availability of an improved bus network with journey reliability, by availability of improved cycling infrastructure, and by continued and managed use of private off-street parking.

Similarly, many properties along the Proposed Scheme have driveways, and residents should be encouraged to utilise their available off-road space for parking (rather than seek to park on-street). Improved compliance with parking and loading bay regulations, and management of loading activities will also assist in offsetting the reduction in on-street parking spaces. It is concluded that the overall impact of loss of parking space on these streets is limited and will be largely offset by the cumulative effect of mitigations.”

As set out in the Traffic Impact Assessment Report under Sections 6.6.2.1.5.4, 6.6.2.1.6.4, 6.6.2.1.7.4, 6.6.2.1.8.4 and 6.6.2.2.1.4, the Proposed Scheme will formalise the parking arrangements to improve facilities for pedestrians and cyclists. Given the availability of equivalent types of parking along adjacent streets within 200m of these locations (and typically within under 100m), the overall impact of this loss of parking is considered to have a Low Negative effect overall along the Proposed Scheme. This low effect is considered acceptable in the context of the aim of the Proposed Scheme, to provide enhanced walking, cycling and bus infrastructure on this key access corridor.

It is noted that following a 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 Merrion Gates, Ballsbridge Village, Pembroke Road, Baggot Street Upper and Baggot Street Lower. It is further noted that increased provision of cycle parking is proposed as part of the Proposed Scheme. A large number of these proposed cycle parking facilities have been located close to urban villages and areas of commercial activity such as in Ballsbridge Village, Baggot Street Upper and Baggot Street Lower.

Similarly, the EIAR Volume 4 Appendices Part 2 of 2 Appendix A10.2 The Economic Impact of the Core Bus Corridors, identifies improved commercial opportunities once the new infrastructure is in place with increased walking and cycling and the evidence shows that any loss of business through less customers arriving by car is more than compensated for by increased numbers of customers arriving by more sustainable modes of transport.

Through the very positive and constructive liaison relationship with the DCC BusConnects Liaison Office throughout the design and planning process there has been consultation with the DCC Roads Department in regard to necessary changes to the Pay and Display parking and associated infrastructure to ensure adequate set down/loading for potentially impacted commercial units. As set out above, the design process has balanced the competing needs to achieve the Proposed Scheme objectives. The Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Roads Department inputs regarding Pay and Display parking and associated infrastructure for set down/loading for potentially impacted commercial units as these matters were the subject of extensive liaison throughout the design development process.

2.4.7.3. Public Lighting Department Comments and Recommended Conditions

Response to Section 2.4.7.3 (including reference to the Appendix):

Through the very positive and constructive liaison relationship with the DCC BusConnects Liaison Office throughout the design and planning process there has been consultation with the Public

Lighting Department in regard to the design process to all the various different elements including the required light level design and the relevant EN certification.

This includes awareness that a small section of the Proposed Scheme route has street lights that are mounted on ESB Networks Infrastructure, and that Public Lighting works may only be carried out on street lights mounted on ESB Networks in accordance with 'ESB Requirements for Work on Public Lighting on ESB's Networks' and by Public Lighting Contractors who have the required training and approvals for such work.

This also includes acknowledgement that, where works are being carried out in areas that remain open for public use, e.g. to facilitate the continued movement of vehicles and pedestrians, then the route will be lighted at all times during night time hours.

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

2.4.7.4. Environmental Protection Division Comments and Recommended Conditions

Response to Section 2.4.7.4 (including reference to the Appendix):

Through the very positive and constructive liaison relationship with the DCC BusConnects Liaison Office throughout the design and planning process there has been consultation with the DCC Environmental Protection Division in regard to the need for Sustainable Environmental Infrastructure as part of the development of the Proposed Scheme.

The NTA has, in consultation with DCC, followed the principles of integrating Sustainable Urban Drainage Systems with all other environmental aspects of the Proposed Scheme using best practice solutions appropriate to the Proposed Scheme. This has included consideration of a softer engineered approach as applicable to manage surface water at source as a greener, more environmentally effective approach for managing storm water. Chapter 13 Section 13.4.1.1 outlines the key design principles for the proposed surface water management design for the scheme.

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

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

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

Sustainable Drainage and Permeability

The drainage design is based on a number of general principles, which are set out in the document 'BusConnects Core Bus Corridor Drainage Design Basis' (NTA 2020) which is included as Appendix K of the Preliminary Design Report in the Supplementary Information. A SuDS drainage design has been developed as a first preference and in accordance with the SuDS Management Train described in the CIRIA SuDS manual (CIRIA 2015). The CIRIA SuDS Manual recommends that when considering SuDS solutions, the preferred approach is a hierarchy whereby runoff using source control solutions (e.g. pervious surfacing) are considered first. Where source control is not possible or

cannot fully address an increase in runoff from a development, residual flows are then managed using site controls (e.g. bioretention / infiltration basins). If this is not practical or residual flows remain above existing runoff rates, regional controls (e.g., oversized pipes) are used. SuDS provide the dual benefits of controlling flow and treating water quality.

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

The details of drainage measures proposed for each catchment and subsequently each water body are provided in Figure 2.63 below which is a reproduction of Table 13.12 from EIAR Chapter 13. It is noted that no new outfalls are proposed as part of the Proposed Scheme.

Table 13.12: Proposed SuDS and Impermeable Area changes

Existing Catchment Reference	Water body	Impermeable Area			SuDS Measures Proposed
		Impermeable Surface Area (m ²)	Change (m ²)	% Change	
Catchment 1	Brewery Stream_010 (Brewery Stream)	N/A	No change	-	None
Catchment 2	Ringsend WwTP	N/A	No change	-	None
Catchment 3	Brewery Stream_010 (Priory Stream)	N/A	No change	-	None
Catchment 4	Brewery Stream_010 (Priory Stream (Via S/W drains in Blackrock Park))	4,306	423	10	FD, TP & OSP
Catchment 6	Ringsend WwTP	N/A	No change	-	None
Catchment 5	Brewery Stream_010 (Boosterstown Stream)	6,770	1,232	18	FD, TP & SD
Catchment 7	Brewery Stream_010 (Elm Park Stream)	13,459	1,811	13	FD, TP, OSP & SD
Catchment 8	Ringsend WwTP	1,231	79	6	FD, TP & OSP
Catchment 9	Ringsend WwTP	3,727	200	5	FD, TP & OSP
Catchment 10	Ringsend WwTP	N/A	No change	-	None
Catchment 11	Ringsend WwTP	N/A	No change	-	None
Catchment 12	Ringsend WwTP	187	52	28	Bio-retention/rain gardens & SD
Catchment 13	Ringsend WwTP	N/A	No change	-	None
Catchment 14	Ringsend WwTP	N/A	No change	-	None
Catchment 15	Ringsend WwTP	N/A	No change	-	None
Catchment 16	Ringsend WwTP	N/A	No change	-	None
Catchment 17	Ringsend WwTP	N/A	No change	-	None

Note: Filter Drains (FD) Tree Pits (TP) Sealed Drains (SD) Oversized pipes (OSP).

Figure 2.63: Extract from EIAR Chapter 13 detailing change in impermeable surface area and proposed SuDS features

It is noted that the Dublin City Council Sustainable Drainage Design and Evaluation Guide was being developed while developing this planning application and was, therefore, not available during that stage of the overall design process. The NTA confirms that it will take account of this document during the detailed design process.

The NTA also confirms that it will liaise with and develop the detailed design of the scheme drainage in collaboration with DCC Drainage Planning, Policy and Development Section and will similarly liaise and collaborate in relation to connections and diversions. Any additional required surveys on the location and condition of surface water infrastructure sewers will be undertaken by the NTA.

Drainage Details

A number of comments refer to the proposed drainage details included in the 'BusConnects Core Bus Corridor Drainage Design Basis' (NTA 2020) which is included as Appendix K of the Preliminary Design Report in the Supplementary Information. In this regard it is noted that the Proposed Scheme, and indeed the BusConnects Dublin Infrastructure Works as a whole, interacts with numerous local authorities, who have differing requirements in relation to drainage details. The BusConnects Core Bus Corridor Drainage Design Basis' document includes options for consideration that have been developed with regard to the necessary standards and good industry practice. The NTA will continue to liaise closely with Dublin City Council Environmental Protection Department and will take their requirements into consideration where aligned with the EIAR.

Flood Risk

The Flood risk associated with the Proposed Scheme is dealt with within the Flood Risk Assessment included in Appendix A13.2 in EIAR Volume 4 Appendices Part 3 of 4. The FRA has been prepared in accordance with the Department of the Environment, Heritage and Local Government (DEHLG) and the Office of Public Works (OPW) Planning System and Flood Risk Management Guidelines for Planning Authorities (hereafter referred to as the FRM Guidelines) (DEHLG and OPW 2009). The Flood Risk Assessment covers three stages of a Site Specific Flood Risk Assessment (Identification of flood risk, initial flood risk assessment and detailed assessment supported by CFRAM hydraulic modelling). The Flood Risk Assessment also includes the 'Development Management Justification Test' (box 5.1 of the 2009 Planning System Flood Risk Management Guidelines), and concludes that the development satisfies the requirements of the Development Management JT (Justification Test). Refer to section 7.5 of the Flood Risk Assessment report.

In relation to pluvial flood risk, it should be noted that all of the proposed networks have been modelled independently of their length. The proposed networks are attenuated to existing runoff rates before discharging to the existing network. Where possible, SuDS and GI measures have been incorporated.

2.4.7.5. Air and Noise Pollution Unit Comments

Response to Section 2.4.7.5 (including reference to the Appendix):

In regards to the recommendation of the Air and Noise Pollution Control Unit relating to the consideration of the potential for increase air quality and noise issues within the EIAR, these issues are fully addressed in Chapter 7 and 9 in Volume 2 of the EIAR. These chapters consider the impacts on Air Quality and Noise/ Vibration during both the construction and operational stage of the scheme.

The Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Air and Noise Pollution Control Unit inputs regarding the Construction Environmental Management Plan (located in Volume 4 Appendix 5.1) submitted with the application and the Unit's Good Practice Guide for Construction and Demolition as these matters were the subject of extensive liaison throughout the design development process.

2.4.8. Archaeology Department Comments

Response to Section 2.4.8 (including reference to the Appendix):

At page 20 of its submission, DCC Archaeology Department acknowledges it supports the proposed assessment and mitigation measures proposed in the EIAR.

The NTA notes the recommendation set out in the Appendix by the Archaeology Department to appoint a Project Archaeologist and Section 15.5.1.1 of Chapter 15 of the EIAR sets out that:

"The NTA will procure the services of a suitably-qualified archaeologist as part of its Employer's Representative team administering and monitoring the works. The appointed contractor will make provision to allow for archaeological monitoring, inspection and excavation works that may arise on the site during the Construction Phase."

2.4.9. Conservation Department Comments

Response to Section 2.4.9 (including reference to the Appendix):

NTA acknowledges that DCC's Conservation Department welcomes the comprehensive assessment on Architectural Heritage (Chapter 16 and Appendix 16) submitted as part of the EIAR, and that the Department notes the comprehensive assessment of the impact of the Proposed Scheme on the architectural heritage, streetscape and urban environment generally and welcomes the proposed mitigation measures across the scheme.

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

Impact of land acquisition / change to site boundaries

The NTA notes that DCC make specific reference to a number of protected structures which will be impacted by the Proposed Scheme due to land acquisition and/or changes to site boundaries. These are:

- Nos. 151 and 153 Merrion Road (RPS 5090/5091);
- The Masonic School, now the Clayton Hotel on Merrion Road (RPS 5086);
- The former Pembroke Town Hall (RPS 5084); and
- 1 Pembroke Road.

Protected Structures or Groups of Protected Structures were identified in the study area, as outlined in Sections 16.3.1.2 and 16.3.1.3 of Chapter 16 of the EIAR, and described in Appendix A16.2 Inventory of Architectural Heritage Sites in Volume 4 of this EIAR. Section 16.4.3.1 outlines the Construction Stage Impacts on these Protected Structures which is summarised as follows:

“The boundary to 151 to 153 Merrion Road (DCC RPS 5090, 5091, odd numbers only) which consists of wrought and cast-iron railings in cut granite plinths with wrought and cast-iron gates and are Protected Structures, are to be repositioned to facilitate a land take which will accommodate a bus and cycle lane. The buildings are of Regional Importance and Medium Sensitivity. The Magnitude of the impact is Medium. The potential Construction Phase impact is Direct, Negative, Moderate and Permanent.

The existing wrought and cast-iron railings and cut granite plinths to the boundary treatment of the former Masonic School, now the Clayton Hotel, Merrion Road (DCC RPS 5086) will be repositioned as a result of a land take to accommodate a new bus lane and cycle lane. The buildings are of Regional Importance and Medium Sensitivity. The Magnitude of the impact is Medium. The potential Construction Phase impact is Direct, Negative, Moderate and Permanent.

The location of the proposed vehicular entrance gate to the former Pembroke Town Hall (DCC RPS 5084) on Anglesea Road will result in the alteration of an existing pedestrian iron gate, iron end posts, part of the wrought iron boundary railings and granite plinth and the removal of historic fabric. The buildings including the existing boundary treatment and pedestrian entrance are of Regional Importance and Medium Sensitivity. The main entrance gate on the corner of Merrion Road will be retained as a pedestrian entrance and no works are proposed to it. The Magnitude of the impact is Medium. The potential Construction Phase impact is Direct, Negative, Moderate and Permanent.

Accommodation works to amend egress from 1 Pembroke Road are proposed. This will include the relocation of the existing egress from Pembroke Road onto Waterloo Road. A new kerb will be installed across the existing exit at number 1 to prevent vehicles from egressing with the garden area extended across the existing gate. The existing entrance will not be altered and the entrance road along the eastern boundary of the site will remain as is. At the location of the new egress, the stone plinth will be removed on either side of the pedestrian gate and the existing railing amended to fit the new egress. Excavation and installation of a new control system for the gates will be required. Along the existing western side of the garden, the driveway will be widened. The existing stone kerbs will be setback, and the garden excavated and reinstated with compacted granular stone. Plant will include a mini-excavator and a dumper. Numbers 1 Pembroke Road is part of a terrace of 6 houses, all of which are Protected Structures (DCC RPS 6552, 6554, 6556, 6558, 6560, 6562, odd numbers only) of Regional Importance and Medium Sensitivity. The Magnitude of the impact is Medium. The potential Construction Phase impact is Direct, Negative, Moderate and Permanent.”

Section 16.4.4.1 outlines the Operational Stage Impacts on these Protected Structures which is summarised as follows:

“The alteration to the entrance gates to the former Pembroke Town Hall (DCC RPS 5084) a protected structure of Regional Importance and Medium Sensitivity, will have an impact on the setting of the protected structure during the Operational Phase. The Magnitude of the impact is Low. The potential Operational Phase impact is Indirect, Negative, Slight and Long-term.

The alteration of the entrances to 1 Pembroke Road (DCC RPS 6552) will have an impact on the setting of numbers 1 to 11 Pembroke Road (DCC RPS 6552, 6554, 6556, 6558, 6560, 6562, odd numbers only) protected structures of Regional Importance and Medium Sensitivity, during the Operational Phase. The Magnitude of the impact is Low. The potential Operational Phase impact is Indirect, Negative, Slight and Long-term.”

Section 16.5.1.1 of the EIAR sets out the proposed mitigation measures during the construction phase. Where boundaries are to be relocated, such as at Nos. 151 and 153 Merrion Road and the Masonic School, now the Clayton Hotel on Merrion Road (RPS 5086) the proposed mitigation is as follows:

“The mitigation is for recording the existing boundaries in position prior to the commencement of construction works. The affected masonry, brickwork, railings, gates, gate posts, capping stones are to be labelled prior to their careful removal to safe storage, and their reinstatement on new lines, reinstating the existing details, and the relationships between the entrances and the historic buildings. Recording is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor. The architectural heritage specialist will oversee the labelling, taking-down and reinstatement of the affected gates (which will be widened for safety reasons), the railings, piers, bricks and masonry. Works to historic fabric will be carried out in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR. With mitigation, the impact magnitude is reduced from Medium to Low. The predicted residual impact is Direct, Negative, Slight and Temporary.”

Where access gates are proposed to be relocated, such as at the former Pembroke Town Hall and 1 Pembroke Road the proposed mitigation is as follows:

“The mitigation is for recording and labelling the affected sections of the boundary treatments in detail prior to the commencement of construction works. The existence of a pedestrian gates in the location of the proposed vehicular entrances will help mitigate the loss of historic fabric as the existing gates will be adapted. The existing gates are to be taken down along with the end posts, sections of railing and plinths. The north end post to the pedestrian gate on Anglesea Road will be retained in position. Removed sections of historic fabric are to be stored safely for reuse. The southern end posts are to be reinstated in the widened entrances. The removed railings will be adapted to form gates to match the existing pedestrian gates. The existing and new gates will be reinstated. Historic fabric which is not directly affected by the proposed landscaping works or works to the gates, such as adjoining sections of railing, or other architectural heritage features will be protected during the course of works. The kerbs or edging to the flower beds will be recorded and labelled before being carefully removed by the appointed contractor and stored for reuse in the proposed landscaping. Recording is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor. The architectural heritage specialist will oversee the labelling, taking-down and reinstatement of the affected gates, railings, piers, bricks and masonry. Works to historic fabric will be carried out in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR. The resulting vehicular entrances with double leaf gates will retain much of the existing historic fabric and will be in keeping with the Protected structures and the adjoining streetscapes. The reinstatement of historic fabric will reduce the magnitude of impact from Medium to Low. The predicted residual impact is Direct Negative, Slight and Long-term.”

Cantilever Signal Poles

DCC outline concerns in relation to the proposed location of a number of cantilever signal poles at the following locations:

- Junction of Merrion Road, Simmonscourt Road and Sandymount Avenue close to the protected structures at the Masonic School, now Clayton Hotel, Merrion Road (DCC RPS 5086)
- Merrion Road – at the Royal Dublin Society (RDS) and at the junction of Serpentine Avenue will be located close to the protected structures at the RDS (DCC RPS 5085)
- Ballsbridge close to the protected structures at Balls Bridge (RMP DU018059) and the Former Pembroke Town Hall (DCC RPS 5084)
- The Belgian Embassy at Shrewsbury House, 2 Shrewsbury Road (Map Sheet 14) located within a residential conservation area

In regard to proposed cantilever signal poles, the NTA recognises the importance of the rationalisation of street furniture across the Proposed Scheme to reduce visual clutter and of particular importance in relation to the siting of associated utilities and traffic management signage in the vicinity of Protected Structures and Conservation Areas, historic paving and historic street furniture. Section 16.4.4.1 notes the following in relation to the proposed cantilever signal poles in these locations:

“The proposed location of cantilever signal poles at the junction of the Merrion Road, Simmonscourt Road and Sandymount Avenue will be located close to the protected structures at the Masonic School, now Clayton Hotel, Merrion Road (DCC RPS 5086), which are of Regional Importance and Medium Sensitivity. The cantilevers will have an indirect or visual impact on the setting of the protected structures, the magnitude of which is Low. The potential Operational Phase impact is Indirect, Negative, Slight and Long-term.

The proposed location of four proposed cantilever signal poles on Merrion Road at the Royal Dublin Society (RDS) and at the junction of Serpentine Avenue will be located close to the protected structures at the RDS (DCC RPS 5085), which are of National Importance and High Sensitivity. The cantilevers will have an indirect or visual impact on the setting of the protected structures, the magnitude of which is Low. The potential Operational Phase impact is Indirect, Negative, Slight and Long-term.

The proposed location of cantilever signal poles at Balls Bridge will be located close to the protected structures at Balls Bridge (RMP DU018059) and the Former Pembroke Town Hall (DCC RPS 5084), which are of Regional Importance and Medium Sensitivity. The cantilevers will have an indirect or visual impact on the setting of the protected structures, the magnitude of which is Low. The potential Operational Phase impact is Indirect, Negative, Slight and Long-term.

The Belgian Embassy (CBC1415BTH150) at Shrewsbury House, 2 Shrewsbury Road is of Regional Importance and Medium Sensitivity. The proposed location of cantilever signal poles on Merrion Road at the junction with Shrewsbury Road will negatively impact the setting of the Belgian Embassy, the magnitude of which is Low. The potential Operational Phase impact is Indirect, Negative, Slight and Long-term.”

Location of Bus Shelters

DCC outline concerns in relation to the proposed location of a number of bus shelters at the following locations. DCC further recommend that should bus shelters in these locations be permitted, that advertising panels should be omitted:

- 1 Merrion View Avenue
- 45-50 Baggot Street Upper
- 67-68 Baggot Lower
- 63-67 Pembroke Road
- 86-88 Pembroke Road
- 4-5 Fitzwilliam Street Lower

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

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

As such, bus shelters have been provided where practicable as part of the Proposed Scheme. In relation to the locations referenced above

“Bus shelters are proposed at numbers 63 (DCC RPS 6601) and 90 Pembroke Road (DCC RPS 6622), protected structures of Regional Importance and Medium Sensitivity. There are no bus shelters in these locations currently. The proposed bus shelters will be highly visible and will detract from the protected structure and the streetscape. The Magnitude of the impact is Low. The potential Operational Phase impact is Indirect, Negative, Slight and Long-term.

A bus shelter is proposed at number 50 Baggot Street Upper (DCC RPS 464) a protected structure of Regional Importance and Medium Sensitivity. A bus shelter is currently located at 19 Baggot Street Upper and another at number 12 (DCC RPS, 444). The existing bus shelters have a negative visual impact on the character of the street and of the adjoining protected structures (DCC RPS 6552, 6554, 6556, 6558, 6560, 6562, 434 to 465). The proposed bus shelters will be highly visible and will detract from the protected structure and the streetscape. The Magnitude of the impact is Low. The potential Operational Phase impact is Indirect, Negative, Slight and Long-term.

Bus shelters are proposed at numbers 47 (DCC RPS 369) and 65 and 66 (DCC RPS 376, 377) Baggot Street Lower, protected structures of Regional Importance and Medium Sensitivity. There are no bus shelters in these locations currently. The proposed bus shelters will detract from the protected structures and the streetscape particularly at number 68 as the bus shelter will be directly in front of it. The Magnitude of the impact is Low. The potential Operational Phase impact is Indirect, Negative, Slight and Long-term.

A bus shelter is proposed at numbers 5 and 7 Fitzwilliam Street (DCC RPS 2869, 2871) protected structures of Regional Importance and Medium Sensitivity. There is no bus shelter in this location currently. Fitzwilliam Street also forms part of the Georgian Mile which runs from Merrion Square to Leeson Street. The proposed bus shelter will detract from the protected structures and on the streetscape and vistas of the Georgian Mile. The Magnitude of the impact is Low. The potential Operational Phase impact is Indirect, Negative, Slight and Long-term.”

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

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

Impacts on Architectural Heritage arising from Proposed Tree Removal

DCC note a number of locations where the proposed removal of trees will impact on architectural character of historic structures, both protected and unprotected, and streetscapes. The following locations are noted:

1. Trees on Merrion Road on Map sheets 8, 9, 10, 11 and 12. Of particular concern are the impact of the removal of these trees on two protected structures on Map Sheet 10 and on Residential Conservation Areas across sheets 10, 11 and 12. EIAR Volume 2 Chapter 3, Consideration of Reasonable Alternatives, sets out the route option assessment process to arrive at the Preferred Route Option for Merrion Road. Section 3.4.1.1.3 sets out the rationale for the Preferred Route Option in this location.

Impacted trees have been presented on the Volume 3 – Figures, Chapter 4 Proposed Scheme Description, 5. Landscaping General Arrangements and further described in Volume 4 Appendices Part 2 of 2, Appendix A17.1 Arboricultural Impact Assessment. The Proposed Scheme has been specifically designed to retain mature trees where practicable.

Section 17.4.4.1.3 of the EIAR, Volume 2 Chapter 17, Landscape (Townscape) & Visual, sets out the following in relation to this section of the Proposed Scheme:

“The Operational Phase of the Proposed Scheme will involve substantial changes along the corridor of the Proposed Scheme, especially at No.85 and adjoining historic avenue on Merrion Road and at the CDETB premises (former Pembroke Town Hall), Ballsbridge, where a new vehicular access is provided through the granite wall and railing. The changes, including loss of mature street trees and impact on property boundaries, will not alter the overall townscape character, however, there will be a substantial impact on some areas of streetscape character along this section of the Proposed Scheme. There will be negative effects remaining from the loss of mature trees in the Construction Phase, even where there is replacement tree planting. Although replacement street trees will be specified to a considerable size (‘extra-heavy’ size; approximately 3-5m tall), given the smaller size and reduced maturity in relation to the large mature trees to be removed, these will take many years into the long-term to reach a state where they provide an equivalent contribution to the streetscape. The magnitude of change is medium.

The potential townscape / streetscape effect of the Operational Phase is assessed to be Negative, Moderate / Significant and Short-Term becoming Negative, Moderate, Long-Term.”

This impact has been considered and assessed and notwithstanding the impacts in this location, the route options assessment undertaken in this location is robust, and delivers the scheme objectives.

2. Trees along Pembroke Road, Wellington Road and Baggot Street Upper on Map Sheets 17, 18 and 19 in the setting of protected structures and Residential Conservation Areas. EIAR Volume 2 Chapter 3, Consideration of Reasonable Alternatives, sets out the route option assessment process to arrive at the Preferred Route Option for this section of the Proposed Scheme. Section 3.4.1.1.2 sets out the rationale for the Preferred Route Option in this location.

Impacted trees have been presented on the Volume 3 – Figures, Chapter 4 Proposed Scheme Description, 5. Landscaping General Arrangements and further described in Volume 4 Appendices Part 2 of 2, Appendix A17.1 Arboricultural Impact Assessment. The Proposed Scheme has been specifically designed to retain mature trees where practicable.

Section 17.4.4.1.4 of the EIAR, Volume 2 Chapter 17, Landscape (Townscape) & Visual, sets out the following in relation to this section of the Proposed Scheme:

“The Operational Phase of the Proposed Scheme will involve substantial changes along the corridor of the Proposed Scheme particularly along Pembroke Road and Baggot Street Upper. The changes will not alter the overall townscape, however, there will be a notable positive effect on some areas of streetscape character along this section of the Proposed Scheme with improved junction layouts, new planting, paving and street trees, most notably at Baggot Street Upper and to a lesser extent on Baggot Street Lower, Pembroke Road and Fitzwilliam Street, and at Grand Canal where there will be improved ramped access to McCartney Bridge. The magnitude of change is medium.

The potential townscape / streetscape effect of the Operational Phase is assessed to be Positive, Moderate and Short-Term, becoming Positive, Moderate / Significant and Long-Term.”

This impact has been considered and assessed and notwithstanding the impacts in this location, the route options assessment undertaken in this location is robust, and delivers the scheme objectives.

3. DCC note that while the introduction of trees within the city is generally supported in principle, that the introduction of a new line of trees on Fitzwilliam Street Lower (Map Sheet 20 and 21) will adversely impact on the architectural character of the Georgian Streetscape in this location. It is further noted that the introduction of trees may impact on coal bunkers beneath the footpath.

The NTA note this comment. As set out in section 14 of the Preliminary Design Report, Landscape and Urban Realm, included in the Supplementary Information, the planting strategy has been developed taking cognisance of the Dublin City Development Plan 2016-2022 and the Dublin City Tree Strategy 2016-2020. Both of these documents support the planting of urban trees where practicable and the Dublin City Tree Strategy in particular, sets out the wide ranging benefits of urban trees in terms of air quality, storm water management, shading and cooling, biodiversity support, noise masking and promoting a general sense of wellbeing.

As noted in Section 1.6 of the Preliminary Design Report, an audit of the existing situation has been carried out which included a cellar survey to identify the presence of Cellars along the route of the Proposed Scheme, with trees located in areas where impacts on cellars are not envisaged. It is further noted that street trees are proposed on the southern side of Fitzwilliam Street only, adjacent to the recently renovated ESB headquarters. The positive impacts of planting new street trees in this location are significant and that they will contribute to an improved overall streetscape.

DCC note that there will be significant tree removal along Nutley Lane (Map Sheet 22) which will impact on the architectural setting of buildings on this road. The NTA note this comment. EIAR Volume 2 Chapter 3, Consideration of Reasonable Alternatives, sets out the route option assessment process to arrive at the Preferred Route Option for Nutley Lane. Section 3.4.1.1.4 sets out the rationale for the Preferred Route Option in this location.

Impacted trees have been presented on the Volume 3 – Figures, Chapter 4 Proposed Scheme Description, 5. Landscaping General Arrangements and further described in Volume 4 Appendices Part 2 of 2, Appendix A17.1 Arboricultural Impact Assessment. The Proposed Scheme has been specifically designed to retain trees where practicable.

Section 17.4.4.1.4 of the EIAR, Volume 2 Chapter 17, Landscape (Townscape) & Visual, sets out the following in relation to this section of the Proposed Scheme:

“The Operational Phase of the Proposed Scheme will involve substantial changes to the existing road corridor, and to boundaries at the RTÉ Campus, Elm Park Golf and Sports Club and St. Vincent’s University Hospital including substantial loss of trees with and replacement of boundaries and some replacement planting. The changes will not alter the overall townscape character, however, there will be a substantial impact on some areas of streetscape character along this section of the Proposed Scheme. There will be negative effects remaining from the loss of mature trees in the Construction Phase, even where there is replacement tree planting. Although replacement street trees will be specified to a considerable size (‘extra-heavy’ size; approximately 3-5m tall), given the smaller size and reduced maturity in relation to the large mature trees to be removed, these will take many years into the long-term to reach a state where they provide an equivalent contribution to the streetscape. The magnitude of change is medium.

The potential townscape / streetscape effect of the Operational Phase is assessed to be Negative, Moderate and Short-Term and Slight / Moderate, Long-Term.”

This impact has been considered and assessed and notwithstanding the impacts in this location, the route options assessment undertaken in this location is robust, and delivers the scheme objectives.

Historic Paving, Setts, Kerbing & Associated Features

In regard to Historic Paving, Setts, Kerbing & Associated Features NTA recognises the importance of protecting historic street surfaces and note that these mitigation measures have been considered in

the EIAR, Volume 2 - Main Chapters, Chapter 16 Architectural Heritage Section 16.5.1 as set out below: “Proposed mitigation measures for architectural heritage features are outlined below and detailed in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR. The methodology has been prepared in accordance with the Architectural Heritage Protection: Guidelines for Planning Authorities (DEHLG 2011) and Paving: the conservation of historic ground surfaces (McLoughlin 2017)”

General Observations

1. DCC note that MacCartney bridge may be impacted by the upgrading of the existing access ramp to the northwest corner of the bridge/canal towpath. DCC recommend that this impact be mitigated by the recording, protection and monitoring of the works during the construction phase. Section 16.5.1 of EIAR Volume 2, Chapter 16 Architectural Heritage, sets out proposed Construction Stage mitigation and monitoring measures to be carried out in relation to the proposed improved access ramp in this location as follows:

“It is proposed that the existing access ramp from the north-west corner of McCartney Bridge (DCC RPS 872) to the Grand Canal tow path (CBC1415BTH211) on the north side of the Canal be upgraded. There is potential for damage to McCartney Bridge and its associated walls and railings and the Grand Canal including the tow path during the Construction Phase. The pre-mitigation Construction Phase impact is Indirect, Negative, Moderate and Temporary. The mitigation is for recording, protection and monitoring prior to, and for the duration of the Construction Phase. Recording, overseeing of protective measures and monitoring is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor, in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR, reducing the magnitude of the impact from Medium to Negligible. The predicted residual Impact is Indirect, Negative, Slight and Temporary.”

2. DCC further note that RPS Structures ref. 1978, 26 Clyde Road, 1979, 27 Clyde Road and ref. 1980, 28 Clyde Road have the potential to be negatively impacted by the provision of new signage in close proximity to them. DCC go on to state that three signs are proposed including, two at the entrance to Clyde Lane, which all signal the same route, and request that this be revisited.

The NTA note this comment. The proposed signage has been designed in accordance with Chapter 5 the Traffic Signs Manual. All three of these signs are required to adequately inform motorists of the proposed traffic restriction in this location.

Buildings and other non-Protected Structures

DCC note that the proposed relocation of the former entrance gates to Bloomfield House, will have a significant negative impact on the structure. DCC further note that the proposed new location has no relevance to the structure, being on lands outside the historical demesne and will have the effect of blurring the historical record, contrary to best conservation practice.

Section 15.5.1.5 of EIAR Volume 2, Chapter 16 Architectural Heritage notes the following with regard to the proposed relocation of the entrance gate at Bloomfield:

“The gothic gateway wrought and cast-iron gates, formerly to Bloomfield House, Merrion Road (CBC1415BTH110) will be repositioned in an alternative location at the pedestrian plaza at the junction of Merrion Road and Nutley Lane as a result of a land take to accommodate a new bus lane and cycle lane. The gateway is formerly associated with the demesne of Bloomfield House (NIAH 2447). The gateway is of Regional Importance and Medium Sensitivity and is all that survives of the demesne landscape. The pre-mitigation Construction Phase impact is Direct, Negative, Moderate and Permanent. The mitigation is the recording of the gothic gateway and wrought iron gates and the various elements are to be labelled before the gateway is carefully taken down. Recording is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor. The materials are to be stored in a secure location during the construction work. The gateway and gates will be reinstated at the pedestrian plaza at the junction of Merrion Road and Nutley Lane. The gates will remain open and in a fixed position. The architectural heritage specialist will oversee the

labelling, taking-down and reinstatement of the affected gates, railings, piers, and masonry. Works to historic fabric will be carried out in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR. The reinstatement of the gothic gateway ensures that it will be preserved and reduces the magnitude of impact from Medium to Low. The predicted residual Construction Phase impact is Direct, Negative, Slight and Long-term.”

The impact of the relocation of this feature has been appropriately addressed in the EIAR.

2.4.10. City Architects Department Comments

Response to Section 2.4.10 (including reference to the Appendix):

On page 26 of the DCC submission, the City Architects Department welcomes the Proposed Scheme to support integrated sustainable transport use through infrastructure improvements for active travel (both walking and cycling), and the provision of enhanced bus priority measures. It goes on to state that the Scheme will facilitate the modal shift from car dependency through the provision of walking, cycle, and bus infrastructure enhancements thereby contributing to an efficient, integrated transport system and facilitating a shift to a low carbon and climate resilient City. This Department also notes that proposals for public realm upgrades, including widened footpaths, high quality hard and soft landscaping contribute towards a safer, more attractive environment for pedestrians are included, and that the Scheme has been developed having regard to relevant accessibility guidance and universal design principles so as to provide access for all users.

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

1. Bus Shelter Design

DCC note that bus shelter locations are indicated on drawings but information is not provided on their proposed design, size and type. It is further noted that the proposed location of bus shelters in the vicinity of building of architectural importance and conservation areas needs to be considered carefully. The submission references Baggot Street Lower and Fitzwilliam Street Lower in particular and notes that bus stops with no shelters would be preferable in these locations. The submission goes on to state that in the interest of visual amenity and having regard to protected structures and their settings, advertisements should not be permitted on bus shelters in Architectural Conservation Areas, Red lined conservation areas or special planning control schemes.

The NTA notes these comments. Section 4.14.3 of the Preliminary Design Report, included in the Supplementary Information, outlines the proposals for bus shelters, as follows:

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

The optimum configuration that provides maximum comfort and protection from the elements to the travelling public is the 3-Bay Reliance ‘mark’ configuration with full width roof. This shelter is a relatively new arrangement which has been developed by JCDcaux in conjunction with the NTA. The shelter consists mainly of a stainless-steel structure with toughened safety glass and extruded aluminium roof beams. Figure 4.10 provides an example image of the preferred full end panel shelter arrangement. The desirable minimum footpath/island widths required to accommodate the full end panel shelter is 3.3m with an absolute minimum width of 3m to facilitate a minimum 1.2m clearance at the end panel for pedestrians. Alternative arrangements for more constrained footpath widths are considered below.



Figure 4.10: Example of a 3-Bay Reliance full end panel bus shelter (Source: JCDecaux)

The cantilever shelter using full width roof and half end panel arrangement provides a second alternative solution for bus shelters in constrained footpath locations. Figure 4.11 provides an example of this type of shelter. Advertising panels in this arrangement are normally located on the back façade of the shelter compared to the full end panel arrangement. The desirable minimum footpath/island widths required to accommodate the full end panel shelter is 2.75m with an absolute minimum width of 2.4m to facilitate a minimum 1.2m clearance at the end panels for pedestrians.



Figure 4.11: Example of a 3-Bay Reliance Cantilever Shelter with full width roof and half end panels (Source: JCDecaux)

Two alternative narrow roof shelter configurations (Figure 4.12) are also available which offer reduced protection against the elements compared to the full width roof arrangements. These shelter configurations are not preferred but do provide an alternative solution for particularly constrained locations where cycle track narrowing to min 1m width has already been considered and 2.4m widths cannot be achieved to facilitate the full width roof with half end panel shelter. The desirable minimum footpath widths for the narrow roof configuration are 2.75m (with end panel) and 2.1m (no end panel). The absolute minimum footpath widths for these shelters are 2.4m (with end panel) and 1.8m (no end panel) to allow for boarding and

alighting passengers in consideration of wheelchair, pram, luggage and other such similar spatial requirements.”



Figure 4.12: Example of a 3-Bay Reliance Cantilever shelter with narrow roof configuration with and without half end panels (Source: JCDecaux)

The provision of bus shelters in proximity to buildings of architectural significance, including on Baggot Street Lower and Fitzwilliam Street, has been assessed in EIAR Volume 2, Chapter 16 Architectural Heritage. Section 16.4.4.1 notes the following with respect to protected structures:

“Bus shelters are proposed at numbers 47 (DCC RPS 369) and 65 and 66 (DCC RPS 376, 377) Baggot Street Lower, protected structures of Regional Importance and Medium Sensitivity. There are no bus shelters in these locations currently. The proposed bus shelters will detract from the protected structures and the streetscape particularly at number 68 as the bus shelter will be directly in front of it. The Magnitude of the impact is Low. The potential Operational Phase impact is Indirect, Negative, Slight and Long-term. A bus shelter is proposed at numbers 5 and 7 Fitzwilliam Street (DCC RPS 2869, 2871) protected structures of Regional Importance and Medium Sensitivity. There is no bus shelter in this location currently. Fitzwilliam Street also forms part of the Georgian Mile which runs from Merrion Square to Leeson Street. The proposed bus shelter will detract from the protected structures and on the streetscape and vistas of the Georgian Mile. The Magnitude of the impact is Low. The potential Operational Phase impact is Indirect, Negative, Slight and Long-term.”

Section 16.4.4.3 notes the following with respect to Conservation Areas:

“Bus shelters are proposed at numbers 47 (DCC RPS 369), 65 and 66 (DCC RPS 376, 377) and 86 (BC1415BTH214) Baggot Street Lower. There are no bus shelters in these locations currently. Baggot Street Lower is a Conservation Area and contains protected structures of Regional and National Importance and is of High Sensitivity. The proposed bus shelters will be highly visible and will detract from the protected structures and the streetscape of the conservation area the magnitude of which is Low. The potential Operational Phase impact is Indirect, Negative, Slight and Long-term.

A bus shelter is proposed at number 5 and 7 Fitzwilliam Street (DCC RPS 2869, 2871). There is no bus shelter in this location currently. Fitzwilliam Street Lower Conservation Area contains protected structures of Regional and National Importance and is of High Sensitivity. It is also forms part of the Georgian Mile which runs from Merrion Square to Leeson Street. The proposed bus shelter will be highly visible and will detract from the protected structures and on the streetscape and vistas of the Georgian Mile, the magnitude of which is Low. The potential Operational Phase impact is Indirect, Negative, Slight and Long-term.”

2. Siting of utility cabinets and above-ground utility infrastructure

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

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

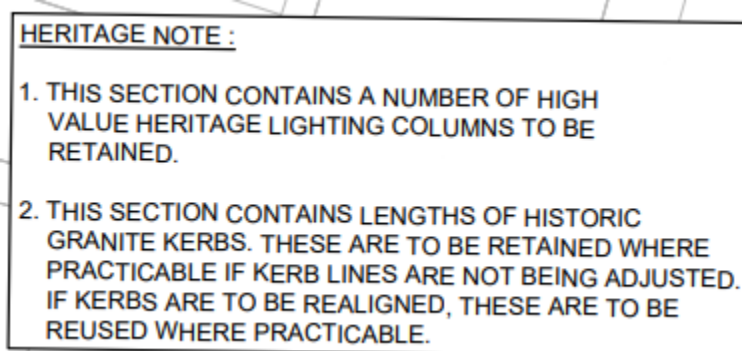
3. Palette of Materials

DCC note that the 'Typical Material Typologies' in Section 4.6.12.2.1 of Volume 2, Chapter 4 Proposed Scheme Description and the Landscape General Arrangement Drawings, do not appear to include or refer to existing historic fabric such as historic granite paving and historic granite kerbs within the Proposed Scheme.

Section 4.10 of the Preliminary Design Report included in the Supplementary Information notes the following:

"Along certain sections of the route where heritage granite kerbing exists, it is proposed to maximise the retention of the existing kerbing where practicable as the outside edge of the footpath, with proposed cycle track being constructed alongside. This is the case in the Baggot Street and Fitzwilliam Street sections."

Heritage features to be retained are also noted on the General Arrangement Drawings where applicable. The following note is included on drawing sheets where heritage features are to be retained or relocated:



4. Palette of street furniture

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

The NTA notes this comment. Section 16.5.1.7 of EIAR Volume 2 Chapter 16 Architectural Heritage includes details of the impacts on existing street furniture of heritage value due to the Proposed Scheme, including post boxes, lamp posts and statuary and other street furniture. NTA is satisfied that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC City Architects Department comments as these matters were the subject of extensive liaison throughout the design development process. NTA will however continue the very positive and constructive liaison with DCC throughout the procurement and construction process including in relation to the final detailing of new street furniture.

5. Boundary Treatments

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

The NTA note this comment. Section 13.5 of the Preliminary Design Report notes the following:

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

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

6. Street Trees and Planting

The submission notes that street trees are proposed on Baggot Street Lower and Fitzwilliam street, which are not in keeping with the Georgian Streetscape and should be omitted. The submission further notes that these proposed trees would reduce the usable width of the footpaths and may impact on cellars.

As noted in response to comments from the DCC conservation department above, Section 14 of the Preliminary Design Report, Landscape and Urban Realm, included in the Supplementary Information, sets out that the planting strategy has been developed taking cognisance of the Dublin City Development Plan 2016-2022 and the Dublin City Tree Strategy 2016-2020. Both of these documents support the planting of urban trees where practicable and the Dublin City Tree Strategy in particular sets out the wide ranging benefits of urban trees in terms of air quality, storm water management, shading and cooling, biodiversity support, noise masking and promoting a general sense of wellbeing.

As noted in Section 1.6 of the Preliminary Design Report, an audit of the existing situation has been carried out which included a cellar survey to identify the presence of Cellars along the route of the Proposed Scheme, with trees located in areas where impacts on cellars are not envisaged. The positive impacts of planting new street trees in this location are significant and that they will contribute to an improved overall streetscape. Footpath widths are appropriately wide in these locations to accommodate new street trees without impacting on pedestrian movements.

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

DCC note that the Scheme red line appears to exclude private landing areas adjacent to the footpath which may be surfaced in materials different to the palette proposed under the Proposed Scheme. It is further noted that there are areas of recently upgraded public footpath, for example in front of the recently renovated ESB headquarters on Fitzwilliam Street, which differ from the palette of the Proposed Scheme. DCC request that a strategy should be devised to incorporate these features.

The NTA note this comment. In relation to Private Landings, these have not been included within the Proposed Scheme red line boundary unless necessary to deliver the Proposed Scheme. If these private landings were to be resurface, it would require significant additional compulsory land acquisition to deliver, which would not align with the ethos of this scheme to minimise compulsory land acquisition. With regard to recently delivered public realm areas, these have been taken into account in developing the Proposed Scheme. In relation to the recently completed ESB headquarters, it is noted that the Landscape General Arrangement Drawings note the following in relation to this location:

“AS-BUILD FOOTPATH SURFACING FROM ADJACENT THIRD PARTY DEVELOPMENT TO CONSIDERED IN RELATION TO PROPOSED FOOTPATH SURFACE MATERIAL”

It is not the intention to replace the existing footpath delivered in this location, should it be sufficient to meet the objectives of the Proposed Scheme.

8. Village Signage

DCC note that existing 'Welcome to Village xxx' signage should be retained, in agreement with the local authority and community

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

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

2.5.11. Parks, Biodiversity and Landscape Division

Response to Section 2.5.11 (including reference to the Appendix):

The NTA note the comments from the Parks, Biodiversity and Landscape division in relation to the loss of trees along the proposed route.

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

An arboricultural survey has been undertaken for the Proposed Scheme to identify the condition of potentially impacted trees. This survey is included in Appendix 17.1 of Volume 4 of the EIAR.

The Landscape Proposals for the Scheme including the maturity of the new trees utilized are outlined in Appendix B5 of the Preliminary Design Report. These landscape proposals include the number of new trees, hedge planting and planting species. The maintenance period is addressed in the Construction Environmental Management Plan in Appendix 5.1 Volume 4 of the EIAR and Chapter 5 of Volume 2 of EIAR.

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

2.5.12. City Arts Officer Comments

Response to Section 2.5.12 (including reference to the Appendix):

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

2.6. Conclusion

C5 - Response to Section 2.6

DCC is supportive of the Proposed Scheme and state in their conclusion on page 29 of the submission:

"The Belfield/Blackrock to City Centre Core Bus Corridor Scheme is supported and welcomed by Dublin City Council as it will ensure the delivery of a number of key policies and objectives of the Dublin City Development Plan 2016-2022 as well as the draft Dublin City Development Plan 2022-2028."

DCC further confirms (at page 29 of its submission) that the development of the Proposed Scheme will provide an upgraded and expanded bus network and quality of service together with better quality cycling and pedestrian facilities and DCC acknowledges that these improvements will make it easier for people to access and use public transport. It also acknowledges that the Proposed Scheme will, in turn, promote modal shift from the private car to more sustainable forms of transport including walking, cycling and public transport, ultimately contributing to the creation of a greener and more sustainable city.

C6 - Summary Response to Appendix:

Dublin City Council and the National Transport Authority

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

Proposed Condition 1:

The first recommended condition requested by DCC states:

1. That a comprehensive agreement is put in place between DCC and the NTA regarding how the corridor is to be handed over to the NTA and its contractors, what pre-inspection and recording of the corridor is necessary and how the corridor is to be maintained during construction activities and by whom. The agreement shall also address the handback process, the treatment of all relevant records treated and how the corridor is to be accepted back by DCC following construction.

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

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

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

Proposed Condition 2:

The second recommended condition requested by DCC states:

2. Following handback, a separate agreement shall be put in place between DCC and the NTA regarding the costs of maintenance of the corridor as a high quality public transport corridor with agreed levels of performance and how the performance of the public transport corridor is not eroded in the future.

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

The Proposed Scheme upon its completion reverts to the status of a public road under the management of the relevant local authority, in this case Dublin City Council. The funding of costs

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

The Exchequer does not currently provide the NTA with funds for dispersal to local authorities for maintenance activities and the NTA does not have a role in overseeing or organising general public road maintenance activities. However, the NTA does retain responsibility for bus fleet, bus stops and bus shelters, and maintenance of these elements falls within its remit.

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

Proposed Condition 3:

The third recommended condition requested by DCC states:

3. All relevant DCC departments involved with the development of the Scheme shall be consulted during the detailed design development process for the Scheme and the NTA shall seek, to the extent practicable, to incorporate the requirements of the DCC departments into the final detailed design of the Scheme.

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

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

Traffic Division

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

Roads Division

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

Public Lighting Department

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

Environmental Protection Division

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

Air and Noise Pollution Control Unit

The Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Air and Noise Pollution Control Unit inputs regarding the Construction Environmental Management Plan (located in Volume 4 Appendix 5.1) submitted with the application and the Unit's Good Practice Guide for Construction and Demolition as these matters were the subject of extensive liaison throughout the design development process.

Archaeology Department

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

Conservation Department

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

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

The proposed engagement of an architectural heritage specialist is addressed in Section 16.5 in Chapter 16 in Volume 2 of the EIAR.

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

- The proposed engagement of an architectural heritage specialist and the duties is addressed in Section 16.5 in Chapter 16 in Volume 2 of the EIAR.
- The NTA will continue to engage with the relevant local authority departments in accordance with the relevant guidelines, policy and legislation outlined in 16.2.4 Chapter 16 in Volume 2 of the EIAR.
- Best conservation practice and the Architectural Heritage Protection Guidelines for Planning Authorities (2011) and the Advice Series issued by the Department of Housing, Local Government and Heritage are referenced in 16.2.4 Chapter 16 in Volume 2 of the EIAR.
- The proposed protection measures for all existing original architectural heritage features in the vicinity of the works are outlined in Section 16.5 Chapter 16 in Volume 2 of the EIAR.
- The requirement of the appointed contractor relating to the Architectural Heritage is outlined Section 16.5 Chapter 16 in Volume 2 of the EIAR.

City Architects Department

Response

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

Parks, Biodiversity and Landscape Division

Response

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

3. Response to Objections to the Compulsory Purchase Order (CPO)

3.1 Overview of Objections

This chapter of the report addresses the 23 written objections that were received by the Board against the Proposed Scheme under ABP Case Number ABP-313509 within the prescribed period for making of objections. Refer to Section 1.2 of this report for a high-level summary overview of the CPO objections and relevant association with submissions in relation to the Proposed Scheme application.

The original ABP numbering of individual objection letters has been maintained for continuity and ease of reference throughout, see Table 3.1 below.

Table 3.1: ABP CPO numbering by geographic location

CPO Ref No.	Location	CPO Ref No.	Location	CPO Ref No.	Location	CPO Ref No.	Location
1	Merrion Road	7	Stillorgan Road	13	Merrion Road (St. Vincent's AGI)	19	157 Merrion Road
2	Rock Road (Blackrock Clinic)	8	Merrion Road (Elm Court Apartments)	14	1-11 Pembroke Road	20	Merrion Road (Elm Park Green)
3	Merrion Road (Facebook / Meta)	9	Nutley Lane (Elm Park Golf and Sports Club)	15	Merrion Road (Merrion House)	21	Merrion Road (Merrion Shopping Centre)
4	Rock Road (Blackrock College)	10	Merrion Road (Elm Park Green)	16	Rock Road (Castledawson / Westfield)	22	1-11 Pembroke Road
5	Merrion Road (St Vincent's Hospital)	11	1-11 Pembroke Road	17	31 – 33 Merrion Road	23	Merrion Road (Roly's Bistro)
6	Merrion Road (Dalata-Clayton Hotel)	12	153 Merrion Road	18	155 Merrion Road		

3.2 Responses to Individual CPO Objections

3.2.1 CPO1 - 1 Merrion Land Limited (133-145 Merrion Road)

Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor, it is proposed to provide a footpath, cycle track, bus lane and general traffic lane in each direction.

The existing road cross section in this location provides a footpath on each side of the road with one general traffic lane and one bus lane in each direction.

In order to achieve the required cross section of the Proposed Scheme land acquisition is necessary from private properties along this section of the Merrion Road. As described in paragraph 4.5.2.1 of Chapter 4 of Volume 2 of the EIAR, the cross-section proposed between SVUH and Estate Avenue has been designed so as to minimise the extent of necessary land acquisition.

The land take required is shown in the following:

- relevant extract of the EIAR Chapter 4 Proposed Scheme Description Appendix the General Arrangement drawings in Figure 3.1
- and the existing aerial views in Figure 3.2 and
- existing street view in Figure 3.3.

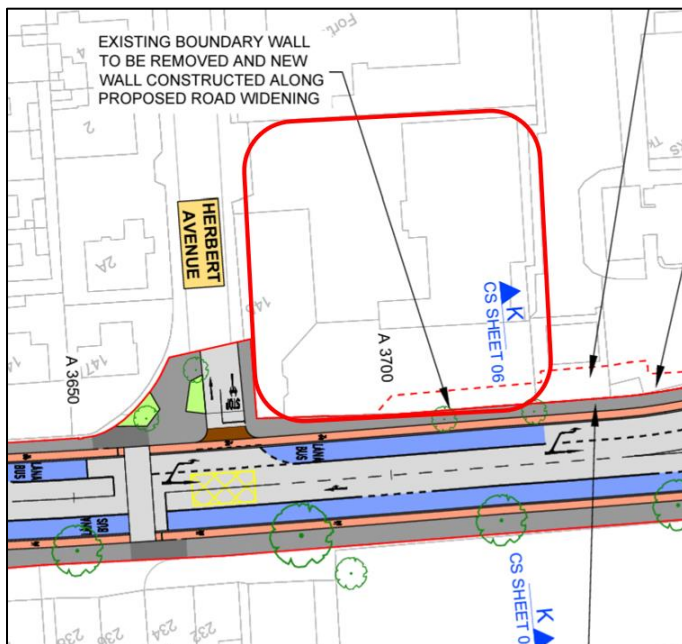


Figure 3.1: Proposed new Layout at 133-145 Merrion Road



Figure 3.2: Existing aerial view of at 133-145 Merrion Road (Image Source: Google)

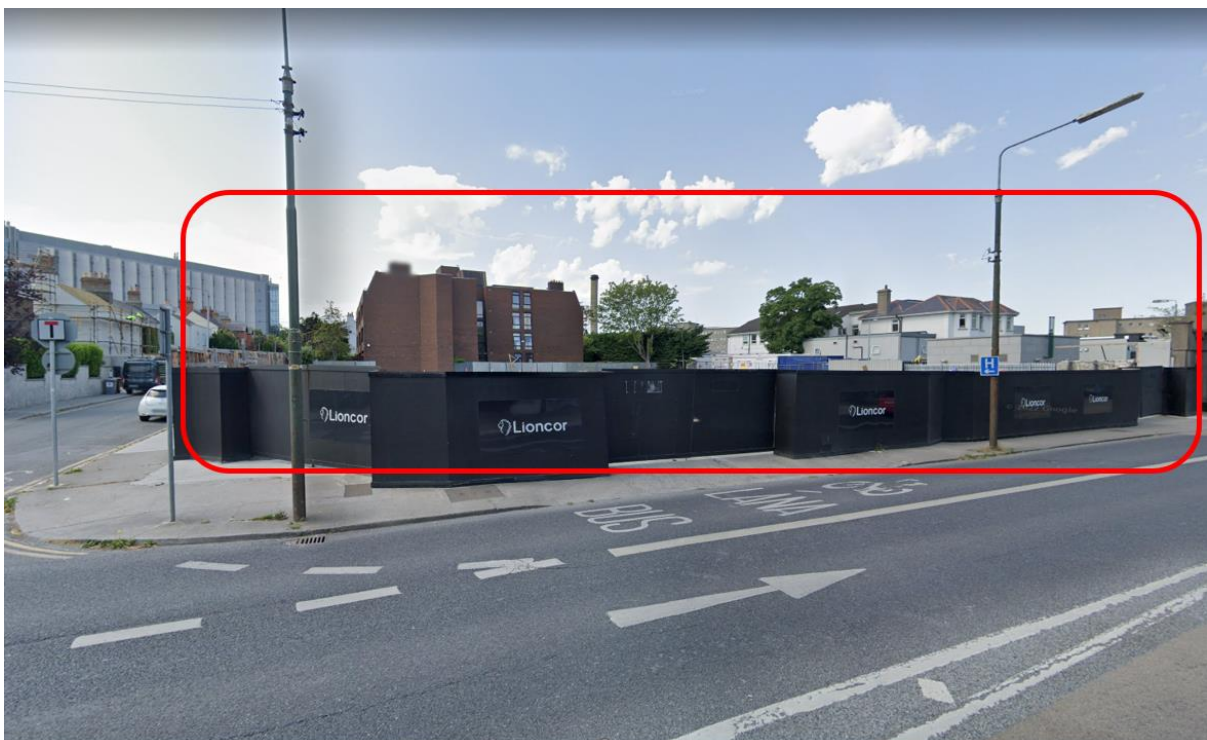


Figure 3.3: Existing Street View of 133-145 Merrion Road (Image Source: Google)

Summary of Observations Raised

Summary of Observations Raised

It is noted that this submission does not raise an objection to the CPO as proposed but does make a number of observations as follows:

- i. Extent of CPO zones – the observation notes that the approved development takes cognisance of the proposed CPO zones but that no extension to the proposed CPO zones would be possible.
- ii. Fire Safety Requirements – the observation is concerned with maintaining uninterrupted access during construction to a fire exit for the approved 133-145 Merrion Road Apartment Development that would discharge onto the Merrion Road.
- iii. Civil Engineering and Drainage Services – the observation is highlighting the need to protect private inspection chambers and utility lines during the construction works in the area subject to CPO.
- iv. Utilities and Public Lighting – the observation seeks that the lighting design for the proposed development does not result in severe light trespass onto the approved 133-145 Merrion Road Apartment Development.
- v. Public Landscaping – the observation notes that the approved 133-145 Merrion Road Apartment Development proposes landscaping works in the area subject to CPO. The observation requests that the NTA liaise with the landowner to ensure that these works are delivered in compliance with the grant of permission.
- vi. Legal Easements and Rights – the observation requests a number of conditions to any permission regarding access to/through the CPO areas during both construction and operation.

Response to Observations Raised

- i. Extent of CPO zones

The Proposed Scheme as submitted to ABP includes all land required to complete the scheme. The design team for the Proposed Scheme liaised with the design team for residential development and an appropriate set-back was agreed to ensure that the proposed residential development As such there will be no requirement for any extension of the CPO area to facilitate the Proposed Scheme.

- ii. Fire Safety Requirements

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

- iii. Civil Engineering and Drainage Services

As set out in section 19.5.1.1 of Chapter 5 of Volume 2, all possible precautions will be taken by the appointed contractor to avoid unplanned interruptions to any services during the Construction Phase of the Proposed Scheme. This will include appropriate investigation by the appointed contractor to identify the precise location of all utility infrastructure within the working areas prior to the commencement of excavation works. Where works are required in and around known utility infrastructure, precautions will be implemented by the appointed contractor to protect the infrastructure from damage, in accordance with best practice methodologies and the requirements of the utility companies, where practicable. Protection measures during construction will include warning signs and markings indicating the location of utility infrastructure, safe digging techniques in the vicinity of known utilities, and in certain

circumstances where possible, isolation of the section of infrastructure during works in the immediate vicinity.

iv. Utilities and Public Lighting

As can be seen in the Volume 3 – Figures, 9. Street Lighting Drawing sheet number 11 of 23, existing street lighting columns are required to be removed as part of the Proposed Scheme as the existing locations clash with the proposed cycle track. Replacement lighting columns are proposed in a similar location to those being removed, albeit set back to facilitate the new alignment. In the Supplementary Information section of the planning application documentation, Section 12.4.2 of the Preliminary Design Report states that all new lighting will aim to minimise the effects of obtrusive light at night and reduce visual impact during daylight. Lighting schemes will comply with the ‘Guidance notes for the Reduction of Light Pollution’ issued by the Institution of Lighting Professionals (ILP).

v. Public Landscaping

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage your its agent / valuer in preparing, negotiating, and advising on compensation. 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 in line with any formal agreements and in accordance with any embedded mitigations identified in the EIAR or conditions/modifications from An Bord Pleanála in relation to the Proposed Scheme application.

vi. Legal Easements and Rights

It is not possible at this stage to agree to easements/rights over CPO areas. As set out in response to item ii above, during construction local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. Where access to the CPO area is required for reasons other than access over the land (such as those reasons set out in the observation), this will be discussed on a case-by-case basis with the appointed contractor and NTA.

Once operational, the area identified for temporary acquisition will be returned to the landowner with all rights restored. The area identified for permanent acquisition will be retained in public ownership. Any rights to, through or over this portion of land, such as those set out in the observation, will form part of formal agreements put in place following the service of the Notice to Treat.

3.2.2 CPO2 - Blackrock Clinic

Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor on the R118 Rock Road, it is proposed to provide a footpath, cycle track, bus lane and general traffic lane in each direction.

The existing road cross section in this location provides a footpath on each side of the 2 general traffic lanes inbound and a bus lane and single general traffic lane outbound. Advisory cycle lanes are also provided.

In order to achieve the desired design for the Proposed Scheme in this area, permanent and temporary land acquisition is required from the Blackrock Clinic lands.

The land take required is shown in the following:

- The relevant extract of the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description Figures, as per Figure 3.4 below;
- the existing aerial views in Figure 3.5, and
- the existing street view in Figure 3.6.

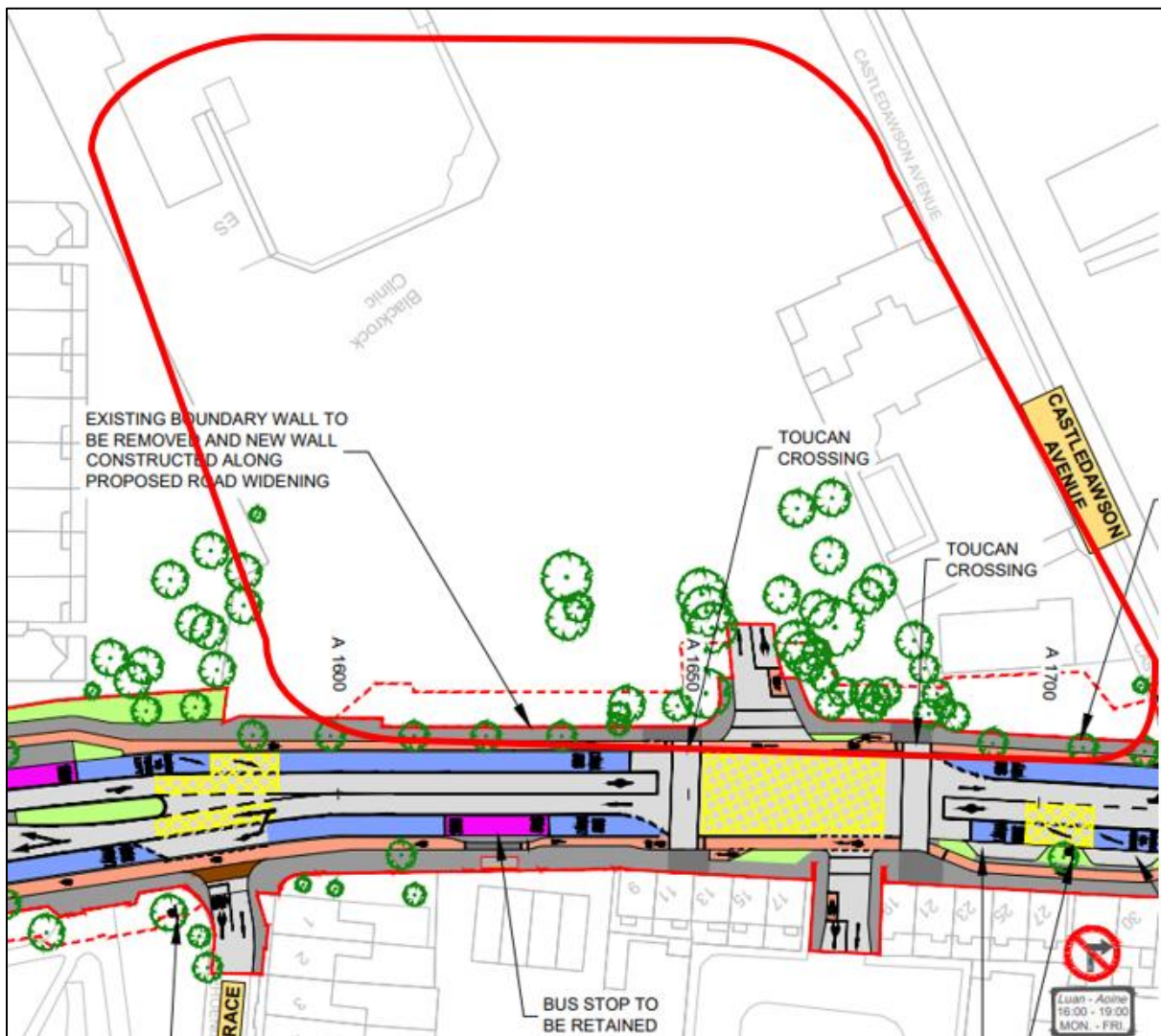


Figure 3.4: Proposed new Layout at Blackrock Clinic



Figure 3.5: Existing aerial view at Blackrock Clinic (Image Source: Google)



Figure 3.6: Existing Street View at Blackrock Clinic (Image Source: Google)

Summary of Objections Raised

This objection to the CPO raises six potential issues:

- i. The extent of CPO is considered to be excessive and will have significant impact on the operation of the Clinic.

The submission states that the proposed land take is excessive and in their view unnecessary to deliver BusConnects. In terms of the impact on Glenalla and Seafort Buildings (plot reference 1020(1)1i and 1020(2).2i) it is submitted that the proposal will result in the loss of approximately seven parking spaces as well as complete inaccessibility of the Glenalla buildings during construction, suggesting that the building would be unusable for the duration of the works.

An opinion is offered to the quantum of permanent and temporary land take required to deliver the scheme which is less than that proposed in the Proposed Scheme documents.

In relation to impact on Blackrock Clinic (plot reference 1019(1)1i, 1019(2)2i and 1019(3)3i), it is submitted that the temporary land take would result in the loss of in excess of 40 car parking spaces which in their view is not required to facilitate the scheme. The permanent loss of car parking is also quantified as being approximately ten spaces where it is noted that significant reconfiguration of the affected parking areas is required. An opinion is offered to the quantum of permanent and temporary land take required to deliver the scheme which is less than that proposed in the Proposed Scheme documents and a suggestion is made that the proposed cross-section can be reduced to minimise the impact on Blackrock Clinic lands. It is also submitted that the extent of CPO at the access junction to incorporate signal equipment is not required.

It is requested that a condition is attached to any approval removing the excess land from the CPO.

ii. Impact on access during construction

The submission states that during construction the operation of the existing main access will be severely impacted suggesting that an alternative access would be required to facilitate the works and that this would still not adequately cater for the operation requirements of Blackrock Clinic. It is submitted that the operation of the junction during construction would result in an impact on access to the facility for patients, visitors, service and emergency vehicles as a result of increased congestion.

It is further noted that the only pedestrian access to Blackrock Clinic will be impacted by the temporary works resulting in an unsafe environment for vulnerable road users.

iii. The BusConnects scheme has not taken cognisance of the proposed relocation of the entrance to Blackrock Clinic nor the future expansion.

It is noted in the submission that Blackrock Clinic currently have two planning applications being processed which are both similar and propose a relocation of the proposed entrance to an alternative location further south.

It is submitted that the proposed relocated entrance would reduce the requirement for CPO from Blackrock Clinic while still facilitating the BusConnects proposals. It is noted that the NTA met with representatives of Blackrock Clinic to discuss these proposals.

It is submitted that should an approval for the Proposed Scheme be forthcoming, that a condition is attached requiring the BusConnects design to comply with the drawings submitted with the submission resulting in reduced land acquisition.

iv. Removal of trees and established boundaries

It is submitted that the Proposed Scheme will result in the removal of several mature trees within the Blackrock Clinic site. It is noted that the scale of the impact could be reduced by reducing land take as set out in item i.

v. Impact on Utilities and Services

The submission states that the Proposed Scheme has the potential to impact on services to the site during construction both in terms of planned or unplanned disruptions. It is requested that all works to utilities, especially any potential disruption to utilities, is discussed with Blackrock Clinic in advance and that contingency plan is agreed before such works commences.

vi. Incorrect Dun Laoghaire Rathdown Development Plan

The submission states the Proposed Scheme application does not reflect the recently adopted Dun Laoghaire Rathdown Development Plan 2022 -2028 and in particular does not reflect changes to zoning the Blackrock Clinic lands.

Response to Objections Raised

The following are the responses to the six issues raised.

i. Extent of CPO considered to be excessive

The Proposed Scheme has been designed to deliver upon the scheme objectives set out in Chapter 1 of the EIAR to deliver a Core Bus Corridor and significantly increasing the Level of Service of the provision for pedestrians and cyclists. In some areas, CPO is required to deliver what has been determined to be the most appropriate design configuration that meets these objectives. The decision to acquire land in these locations has not been taken lightly and all areas included in the CPO have been carefully considered and only included where deemed absolutely necessary to meet the scheme objectives and to construct the scheme with permanent and temporary acquisitions respectively.

In this specific area, the proposed cross-section and subsequent land acquisition have been considered and deemed necessary to facilitate the optimum scheme as presented in EIAR Volume 3 Chapter 4 Proposed Scheme Description Figures, General Arrangement drawings. The submission received from Blackrock Health (Blackrock Clinic) makes a number of suggestions with regard to how temporary and permanent land acquisition could be reduced on both the Glenalla and main Blackrock Clinic plots. This appears to be achieved by reducing footpath and cycle track widths locally to 1.8m and 1.75m respectively and by curtailing cycle tracks such that cyclists share with the bus lane. Section 5 of Appendix A4.1 BusConnects Preliminary Design Guidance Booklet (PDGB) of the EIAR sets out the guidance for the proposed cross-sectional width of all proposed facilities including footpath and cycle tracks. This sets the desirable minimum width of 2m for footpaths and 2m for cycle tracks. At this location a 2m footpath has been provided. However, as noted in table 4.3 of Chapter 4 of the EIAR, a reduced width cycle track of 1.5m is provided through this area as providing a standard width would require additional land acquisition further impacting on Blackrock Clinic lands.

In relation to the suggested curtailed cycle track as the submitted alternative, it should be noted that the Proposed Scheme will facilitate a step change in the level of segregated cycling provision in comparison to existing conditions along the entire length of the corridor. 100% provision of fully segregated cycle infrastructure is proposed for the entire length of the Proposed Scheme. Table 6.49 and table 6.50 of Chapter 6 of the EIAR outline the AM and PM peak hour trips expected by mode in the 2028 traffic model. Cycling is projected to increase its modal share from 4% to 16% during the AM peak hour and from 5% to 19% during the PM peak hour. In absolute numbers, this equates to an increase from 60 trips to 230 trips during the AM peak hour (283% increase) and an increase from 60 trips to 230 trips during the PM peak hour (267% increase). As outlined in section 6.4.6.3 Operational Phase Summary, of Chapter 6 of the EIAR, a LoS assessment was undertaken using an adapted version of the NTA's National Cycle Manual Quality of Service (QoS) Evaluation criteria. The results of the assessment demonstrate that the LoS during the Do Minimum scenario consists of C ratings. During the Do Something scenario, the LoS consists predominantly of the highest A / A+ ratings. Given the quality of the existing cycling infrastructure along the Proposed Scheme, the improvements will have a Positive, Moderate and Long-term effect in Sections 1 (including in front of Blackrock Clinic) and Section 3 of the Proposed Scheme, and a Positive, Very Significant and Long-term effect in Sections 2, 4 and 5. Taking all of the expected benefits outlined above, that the Proposed Scheme will deliver for cycling infrastructure, the suggested curtailed cycle track would result in an undesirable arrangement for cyclists which fails to meet the scheme objectives in this area.

It should also be noted that the suggested curtailed cycle track and the suggested sharing of the bus lane by cyclists would interfere with the stated objectives of the Proposed Scheme whereby the effectiveness of the proposed dedicated bus lanes would be reduced as a result of the sharing. For the objectives of the Proposed Scheme to be met, it is critical that safe and segregated facilities for both cyclists and public transport are provided.

It is not clear if this submission also includes other proposals for the alignment through this area but reference is made to a further reduction being possible by acquiring some of the necessary lands from properties on the northern side of the Rock Road. However, there are constraints on this side of the road at the entrance to Emmet Square that restrict the ability for CPO on this side of the road. These constraints are outlined in Figure 3.7 and described in the following text.



Figure 3.7: Constraints at Emmet Square (Image Source: Google)

As noted in Figure 3.7, there is a significant level difference between No. 19 Rock Road and the Emmet Square access road (c. 400mm) and No. 17 Rock Road and the Emmet Square access road (c. 200mm). This means that these areas cannot be used to form part of the public footpath as this would introduce a step(s) to the footpath which is not appropriate to facilitate accessible movements along the footpath. As can be seen in the General Arrangement Drawing extract in Figure 3.4 the Proposed Scheme respects these constraints with the cross section being offset from this point. To achieve a straighter, improved road alignment, to incorporate a high-quality bus stop, and to improve footpath widths, the Proposed Scheme continues the kerbline on this proposed alignment. These design considerations combined require that all space necessary to facilitate the Proposed Scheme is acquired from Blackrock Clinic lands.

In relation to the impact on the Glenalla plot (plot reference 1020(1)1i and 1020(2).2i), it is submitted that the proposal will result in the loss of seven parking spaces. The permanent acquisition will result in the loss of between 3.2m to 4.7m with an additional 8-9m temporarily acquired to allow for the construction of boundary treatment and reinstatement works. In terms of the permanent acquisition,

this is required to facilitate the required cross section as set out above and in General Arrangement Drawing extract in Figure 3.4. As can be seen in the aerial image in Figure 3.5 which also shows the temporary (dashed red line) and permanent (solid red line) acquisition, approximately 3-4 car parking spaces will be removed by the proposed works. However, it is noted that following completion of the works there will still be ample space to facilitate a number of car parking spaces within the confines of the plot (c.6 – 7 spaces)

In terms of the temporary impact on the Glenalla plot, the space identified is required to facilitate the construction of the boundary treatment (a retaining wall) and reinstatement works within the plot. Specifically, given the gradients within the driveway of the property, it will be necessary to regrade the area when reinstating the plot following construction of the boundary treatment works. For clarity, the entire area identified for temporary acquisition is not expected to be required for the duration of the works. It is acknowledged that during the construction of the works there will be inconveniences for all users but this will be managed to minimise impacts for all affected parties. The duration of the works will vary from property to property, but access and egress will be maintained at all times, including to pedestrian access to the building on the subject plot. As described in paragraph 5.5.3.2 of Chapter 5 Construction of Volume 2 of the EIAR, details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area. When roads and streets are being upgraded, there will be some temporary disruption / alterations to on-street and off-street parking provision, and access to premises in certain locations along the Proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times.

In relation to impact on the Blackrock Clinic plot (plot reference 1019(1)1i, 1019(2)2i and 1019(3).3i), it is submitted that the proposal will result in the loss of approximately ten parking spaces. The permanent acquisition will result in the loss of between 1m to 4m with an additional 5.0m temporarily required to allow for the construction of boundary treatment and reinstatement works. While the proposals would require reconfigurations to parking in this area, there is an opportunity to continue to provide parking, for example by replacing this perpendicular parking in the affected area with parallel parking allowing 3-4 parking spaces to be provided and reducing the net loss to only 6 spaces. The exact details of any reconfiguration required during construction will be discussed with Blackrock Clinic prior to commencement of any works.

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage its agent / valuer in preparing, negotiating, and advising on compensation. 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 in line with any formal agreements and in accordance with any embedded mitigations identified in the EIAR or conditions/modifications from An Bord Pleanála in relation to the Proposed Scheme application.

In terms of the temporary impact on the Blackrock Clinic plot, it is submitted that the proposal will result in the temporary loss of 40 car parking spaces as a result of the proposed temporary land acquisition. However, as can be seen in the aerial image in Figure 3.5, the actual number directly affected by the temporary acquisition would be 15 spaces. As the temporary acquisition extends into the circulating aisle, there may be an additional loss of 3-4 spaces to facilitate the necessary circulating aisle width by making changes to the car parking on the row opposite those being acquired temporarily (e.g. making this row of parking angled parking bays). In total it is therefore estimated that there will be a temporary loss of approximately 20 spaces. However, similar to proposals at the Glenalla plot, the area identified for temporary acquisition is required to facilitate the construction of the boundary wall and necessary reinstatement works. The full extent of the temporary acquisition may not be required for the duration of the works and as such more parking may be retained for extended periods during construction. As noted above, details regarding temporary provisions will be discussed with Blackrock Clinic prior to construction starting in the area.

The submission also queries the need for the extent of permanent CPO along the access road to the Blackrock Clinic. This CPO is required to facilitate traffic signal infrastructure (induction loops) and maintenance of same in future as and when required.

The need for this was explained to Blackrock Clinic in recent meetings. While it is acknowledged that the induction loops are currently within lands controlled by Blackrock Clinic, and access for maintenance is facilitated by agreement, the proposed CPO ensures that access for maintenance is always available and accessible by the roads authority in an emergency scenario.

ii. Impact on access during construction

The submission suggests that in order to facilitate continued access to the site during construction, it will be necessary to provide a temporary access to Blackrock Clinic. This specific need has not been identified by the design team who believe that the Proposed Scheme can be delivered while retaining access/egress to the site via the existing access point using standard traffic management practices.

It is acknowledged that during the construction of the works there will be inconveniences for all users but this will be managed to minimise impacts for all affected parties. The duration of the works will vary from property to property, but access and egress will be maintained at all times. As described in paragraph 5.5.3.2 of Chapter 5 Construction of Volume 2 of the EIAR, details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area. When roads and streets are being upgraded, there will be some temporary disruption / alterations to on-street and off-street parking provision, and access to premises in certain locations along the Proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times. This includes facilitating alternative pedestrian access to the site if required, which is noted as a concern in the submission.

Furthermore, EIAR section 17.5.1 states *'where properties are subject to permanent and / or temporary acquisition (especially Blackrock Park, Blackrock Clinic, Blackrock College, Nos. 85, 151 to 157 and Elm Court apartments, properties on Merrion Road, Elm Park Golf and Sports Club and St. Vincent's University Hospital) appropriate measures will be put in place by the appointed contractor to provide for protection of features, trees and vegetation to be retained, for continued access during construction, for adequate security and screening of construction works. All temporary acquisition areas will be fully decommissioned and reinstated at the end of the Construction Phase or at the earliest time after the reinstatement works are completed to the satisfaction of the NTA'*.

The submission notes specific concerns around increased congestion at the junction during construction and the potential to impede access to Blackrock Clinic. As noted above there will be inconveniences during the works which will be managed to minimise impacts. As noted in section 6.5.1 of Chapter 6 of the EIAR, a detailed Construction Traffic Management Plan will be prepared, and subsequently implemented, by the appointed contractor prior to construction, including Temporary Traffic Management arrangements prepared in accordance with Department of Transport's 'Traffic Signs Manual, Chapter 8 Temporary Traffic Measures and Signs for Roadworks'. The CTMP will be consulted upon with the road authority and will include measures to minimise the impacts associated with the Construction Phase upon the peak periods of the day. It will include imbedded mitigation measures which will assist to alleviate any negative impact as a result of the Construction Phase of the Proposed Scheme. The appointed contractor will also prepare a Construction Stage Mobility Management Plan (CSMMP) which will be developed prior to construction, as described in the CEMP, to actively encourage personnel to travel to site by sustainable means.

iii. The BusConnects scheme has not taken cognisance of the proposed relocation of the entrance to Blackrock Clinic nor the future expansion.

The Proposed Scheme includes for the retention of the existing access junction at Blackrock Clinic in the absence of planning permission for an application for redevelopment at Blackrock Clinic (with the relocation of the access junction) at the time that the Proposed Scheme was lodged for planning to An Bord Pleanála on May 12th 2022. As acknowledged in the submission, the NTA has met with

Blackrock Clinic on a number of occasions throughout the design process. As such the NTA have been aware of Blackrock Clinic's plans to seek permission for a new access junction in a location further south than the existing access junction. We note that planning permission for planning reference D22A/0490 was granted on August 31st 2022 by Dún Laoghaire-Rathdown County Council. As part of the engagement with Blackrock Clinic during the design process for the Proposed Scheme, the NTA have reviewed and commented on the junction relocation proposals and how they relate to the Proposed Scheme. It has been acknowledged that the proposed junction relocation is compatible with the Proposed Scheme.

iv. Removal of trees and established boundaries

In relation to tree loss at Blackrock Clinic, specific efforts have been made in this area to reduce impact on private land and trees. As presented in Table 4.3 of Chapter 4 of the EIAR, a reduced width cycle track of 1.5m is provided through this area, as the provision of a standard 2m width would require additional land acquisition, further impacting adjacent private property and removal of trees.

EIAR Volume 4 Part 2 Chapter 17 Appendix A17 provides the Arboricultural Impact Assessment Report, which includes detailed drawings showing all trees that are to be removed. It can be seen from these drawings that 10 trees are identified for removal at Blackrock Clinic lands. However, as can be seen in the Landscaping General Arrangement drawings included in EIAR Volume 3 Chapter 4 Section 5, 20 trees are proposed resulting in a net increase of 10 trees at the Blackrock Clinic site.

In terms of visual impact Table 17.12 Chapter 17 of the EIAR identifies that post mitigation, the impact on the Proposed Scheme section between Stradbroke Road and Booterstown Avenue would be negative, slight/moderate and long-term (with establishment of landscaping at 15 years post construction). In terms of the impact immediately at the Blackrock Clinic site, section 17.5.2.1.3 presents a review of the photomontages presented Figure 17.2 in Volume 3 of the EIAR (reproduced in



Figure 3.8 below). This states that the primary changes are the widening of the road to the west, the setting back of boundaries and the removal of a mature tree from the open space at Blackrock Clinic. A segregated cycle track is introduced to both sides of the road and there are improvements to the street scape in the form of a new ornamental planting area to the right foreground, new stone paving across the junction with Emmett Square and new street trees along the left-hand side of the road.

There is predicted to be a minor negative change to the character of the view from the loss of the tree but no appreciable loss of visual amenity, especially over the long-term through establishment of the proposed trees.



Figure 3.8: Photomontage View 2 As Proposed View from Rock Road at Emmet Square

v. Impact on Utilities and Services

Chapter 19 Material Assets of the EIAR assesses the potential impact of construction works on major infrastructure and utilities. Section 19.5.1.1 states that the Proposed Scheme has been designed to minimise the impact on major infrastructure. This includes the avoidance of interactions with major utility infrastructure as far as possible. Where there are interfaces with existing utility infrastructure, protection in place or diversion as necessary is proposed to prevent long-term interruption to the provision of the affected services.

All possible precautions will be taken by the appointed contractor to avoid unplanned interruptions to any services during the Construction Phase of the Proposed Scheme. This will include appropriate investigation by the appointed contractor to identify the precise location of all utility infrastructure within the working areas prior to the commencement of excavation works. Where works are required in and around known utility infrastructure, precautions will be implemented by the appointed contractor to protect the infrastructure from damage, in accordance with best practice methodologies and the requirements of the utility companies, where practicable. Protection measures during construction will include warning signs and markings indicating the location of utility infrastructure, safe digging techniques in the vicinity of known utilities, and in certain circumstances where possible, isolation of the section of infrastructure during works in the immediate vicinity.

Consultation has been undertaken with the major utility companies regarding the design, potential interfaces and measures required to protect or divert the infrastructure which is interfacing with the Proposed Scheme design. All utility companies for which diversions are proposed will continue to be consulted with NTA oversight when designing any diversions to ensure that proposed diversions conform to the utility provider's requirements, where practicable, and acceptable to the NTA, and to

ensure that service interruptions are kept to a minimum. Where diversions, or modifications, are required to utility infrastructure (as listed in section 19.4.3 of Chapter 19), service interruptions and disturbance to the surrounding residential, commercial and/or community property may be unavoidable. Where this is the case, it will be planned by the appointed contractor. Required service interruptions will generally only occur for a set period of time per day (a set number of hours not exceeding eight hours where reasonably practicable) and will generally not be continuous for full days at a time. Prior notification will be given to all impacted properties. This notification will include information on when interruptions and works are scheduled to occur and the duration of such interruption. Any required works will be carefully planned by the appointed contractor to ensure that the duration of interruption is minimised in so far as is practicable.

Given the important function of Blackrock Clinic, any planned interruption to services will be discussed with them in advance.

vii. Incorrect Dún Laoghaire-Rathdown Development Plan

The Dún Laoghaire-Rathdown County Council Development Plan (DLRCCDP) 2016-2022 was cited in the application documents as it was the statutory Development Plan in place at the time of writing/preparation of the application documents. The Dún Laoghaire-Rathdown County Development Plan (DLRCCDP) 2022-2028 has been adopted and came into effect on the 21st April 2022. The DLRCCDP 2022-2028 is subject to a draft Ministerial Direction in which some elements of the Development Plan (that do not appear to be relevant to the subject representation) have not, at the time of writing, come into effect.

The representation highlights that the zoning objective of the subject lands has changed from MH 'To improve, encourage and facilitate the provision and expansion of medical/hospital uses and services' under the DLRCCDP 2016-2022 to Objective SNI 'To protect, improve and encourage the provision of sustainable neighbourhood infrastructure' under the DLRCCDP 2022-2028.

It is considered that the Proposed Scheme remains compliant with the objectives of the DLRCCDP 2022-2028 despite the change of zoning objective from MH under the DLRCCDP 2016-2022 to SNI under the DLRCCDP 2022-2028. As set out above, the scale of the potential impacts upon the SNI Zoning Objective are limited and in the most part temporary.

The SNI Objective 'To protect, improve and encourage the provision of sustainable neighbourhood infrastructure' is considered as complimentary towards the Proposed Scheme as it will facilitate the provision of a sustainable public transport network serving the Blackrock Clinic lands.

The DLRCCDP 2022-2028 updates and further confirms Dún Laoghaire-Rathdown County Council's continued support for the BusConnects programme of works. The DLRCCDP 2022-2028 includes Policy Objective T6: Quality Bus Network/BusConnects which sets out the following: '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 Strategy 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)'.

In addition to this policy objective the plan also includes the route of the 'Core Bus Corridor Blackrock to Merrion' along the Rock Road.

3.2.3 CPO3 - Blue Infinity PropCo. Limited

Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor, it is proposed to provide a footpath, cycle track, bus lane and general traffic lane in each direction.

The existing road cross section in this location provides a footpath on each side of the road with one general traffic lane and one bus lane in each direction. An indented bus stop is also currently provided on the inbound side of the carriageway.

In order to achieve desired design for the Proposed Scheme, temporary land acquisition is necessary from private properties at this location. This is required to provide a raised table treatment across the junction as set out in Section 8.1 of Appendix A4.1 Preliminary Design Guidance Booklet.

The land take required is shown in the following:

- The relevant extract of the EIAR Chapter 4 Proposed Scheme Description Appendix the General Arrangement drawings in Figure 3.9,
- The existing aerial views in Figure 3.10 and
- The existing street view in Figure 3.11 below.

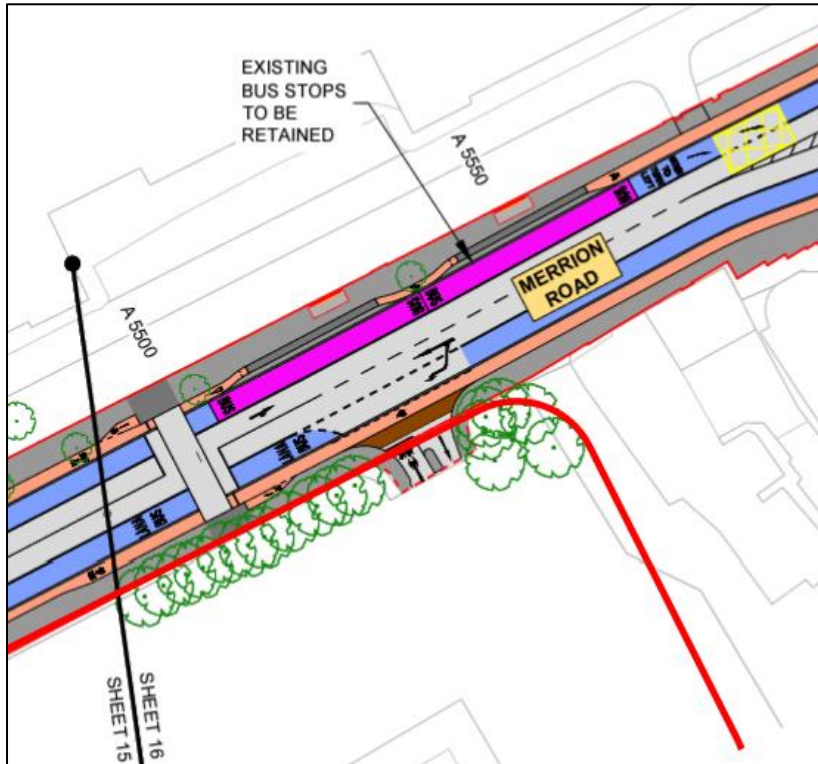


Figure 3.9: Proposed new Layout at Meta, Merrion Road



Figure 3.10: Existing aerial view of Meta, Merrion Road (Image Source: Google)



Figure 3.11: Existing Street View of Meta, Merrion Road (Image Source: Google)

Summary of Objection

i. Clarity of information provided

The submission received states that it was not clear from the material received by the landowner what the nature and extent of works to be carried out on the site were and how the works would interfere with their access and other rights. The objection is raised on the basis that the material provided is not sufficient to allow the landowner to understand the proposals and impact on their property.

Response to Clarification Raised

i. Clarity of information provided

As noted in the submission, Blue Infinity PropCo Limited contacted the NTA separately seeking clarification on the documents received. In response to the letter received by the NTA, the design team contacted James Kay-Hards who was acting on behalf of Blue Infinity PropCo limited to provide clarity on the items raised. It is noted that this conversation occurred after the submission of the objection received by ABP. The items discussed are presented below.

In order to achieve the desired design for the Proposed Scheme, temporary land acquisition is necessary from the subject site at this location. This is required to provide a raised table treatment across the junction as set out in Section 8.1 of Appendix A4.1 Preliminary Design Guidance Booklet. This facility improves safety for pedestrians and cyclists at uncontrolled junctions across the scheme. In order to facilitate the works, it is necessary to temporarily CPO lands at the current access point.

As described in section 5.5.3.2 of Chapter 5 of Volume 2 of the EIAR, details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area. The duration of the works will vary from property to property, but access and egress will be maintained at all times. Once the works are complete, these lands would be handed back to the landowner.

The submission notes that that the schedule appended to the Form of Notice did not include a Part IV (Section B) or (Section C). As no private rights were identified at this plot, no schedule extract has been provided with the Form of Notice.

3.2.4 CPO4 - Blackrock College

Description of the Proposed Scheme at this location

In order to achieve the Proposed Scheme objectives along this section of the corridor on the R118 Rock Road, it is proposed to provide a footpath, cycle track, bus lane and general traffic lane in each direction.

The existing road cross section in this location provides a footpath on each side of the road with one general traffic lane and a bus lane in each direction. At the Willow Park school access, a 2nd general traffic lane exists in the inbound direction.

In order to achieve the desired design for the Proposed Scheme, permanent and temporary land acquisition is required from the Blackrock College lands including at the two access locations on Rock Road.

The land take required is shown in the following:

- The relevant extract of the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description Figures, as per Figure 3.12, Figure 3.13 and Figure 3.14 below;
- The existing aerial views in Figure 3.15 and Figure 3.16, and
- The existing street view in Figure 3.17, Figure 3.18 and Figure 3.19 .

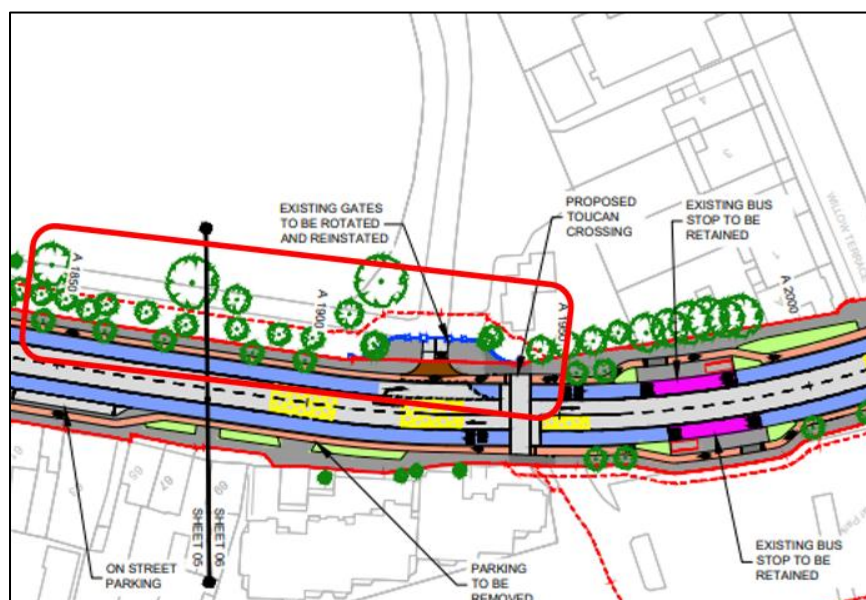


Figure 3.12: Proposed new Layout at Blackrock College



Figure 3.15: Existing aerial view at Blackrock College (Image Source: Google)



Figure 3.16: Existing aerial view at Blackrock College (Willow Park) - (Image Source: Google)

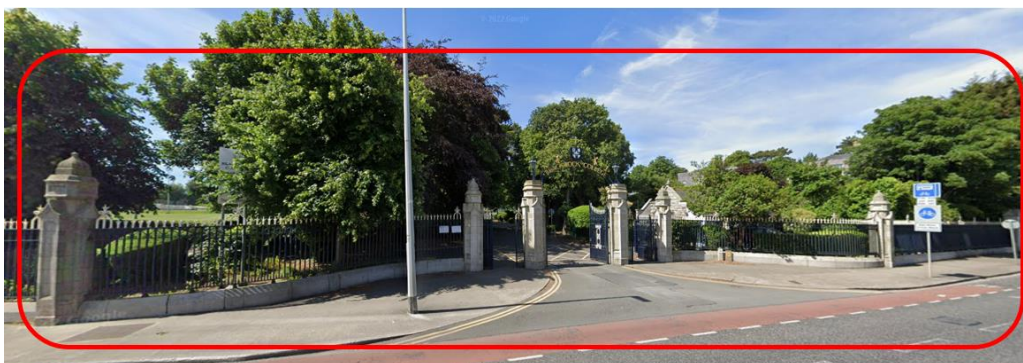


Figure 3.17: Existing Street View at Blackrock College (Image Source: Google)

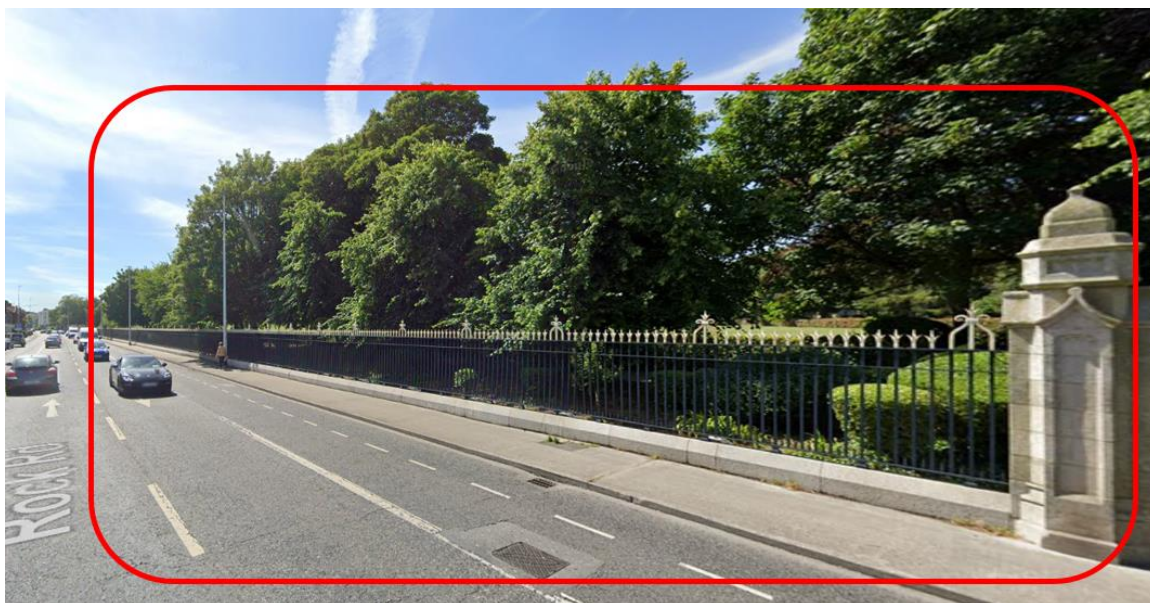


Figure 3.18: Existing Street View at Blackrock College (Image Source: Google)



Figure 3.19: Existing Street View at Blackrock College (Willow Park) (Image Source: Google)

Summary of Objections Raised

This objection to the CPO raises three potential issues:

- i. Proposed Arrangement at Willow Park School Entrance Gates

Impact on internal traffic management arrangements which has been developed to cater for peak drop-off and pick-up periods.

The submission states that the proposal at Willow Park Gates ignores the existing location of piers at the gated entrance and that these would be sitting in the middle of the running lanes. The submission suggests that the design would need to be updated to respect this constraint and allow sufficient space to allow the contra-flow movements through the gate.

It is requested that the NTA consider maintaining the existing arrangement at the Willow Park Gates which allows two exit lanes from the campus and a wider bell mouth area to allow the contra-flow movements at the gates. It is also requested that the existing yellow box is retained on the inbound side of Rock Road at this location.

ii. Access during Construction

The submission states the Blackrock College Archway is the primary access point to serve Blackrock College from the Rock Road and that vehicular and pedestrian access must be maintained during the works.

The submission also states that the Gate Lodge which is located within the college grounds and directly adjacent the entrance gates will also require vehicular and pedestrian access to be maintained during the works.

iii. Reinstatement and Method Statements

The submission requests that all temporary CPO areas are to be reinstated in consultation and agreement with the College.

The submission also states that only a brief statement is made in the EIAR in respect of the gateway/pier relocation methodology. It is requested that a full detailed method statement is submitted to the College for review prior to the commencement of relocation works.

Response to Objection Raised

i. Willow Park School Entrance Gates

There are no proposals to materially affect the manner in which the Willow Park School / Blackrock College traffic management regime operates. At the Willow Park entrance, the pillars and gate will remain unaffected by the works. While the lane arrangement will be reconfigured at the junction of the access with the Rock Road, the contra-flow one-way shuttle arrangement that currently operates at the gates will not be affected and will be retained.

In relation to the request to retain two exit lanes, the proposed junction arrangement has been designed so as to provide a raised table entry treatment across the junction as set out in Section 8.1 of Appendix A4.1 Preliminary Design Guidance Booklet. This facility improves safety for pedestrians and cyclists at uncontrolled junctions and is a detail that is being proposed across the Proposed Scheme. In order to reduce the pedestrian crossing width and reduce vehicle speeds at the access junction, corner kerb radii have been reduced and the entrance road width reduced also to 1 lane in each direction. This will result in a safer junction for pedestrians and cyclists and it is not believed that this will have a material impact on traffic movement into and out of the site.

The existing yellow box provided in advance of, and through the existing gate is noted and will be considered at detailed design stage.

ii. Access During Construction

The duration of the works will vary from property to property, but access and egress will be maintained at all times. It is acknowledged that during the construction of the works there will be inconveniences for all users but this will be managed to minimise impacts for all affected parties. As described in paragraph 5.5.3.2 of Chapter 5 Construction of Volume 2 of the EIAR, details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area. When roads and streets are being upgraded, there will be some temporary disruption / alterations to on-street and off-street parking provision, and access to premises in certain locations along the Proposed Scheme.

Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times.

iii. Reinstatement and Method Statements

In terms of method statements, section 16.5.1.5 of Chapter 16 of the EIAR states that the protected dressed granite piers, plinth and wrought iron railings and main entrance gates to the boundary of Blackrock College, Rock Road, Blackrock (DLR RPS 99, NIAH 2484) are to be repositioned to accommodate a bus and cycle lane. The demesne will also be slightly reduced under the proposal. The pre-mitigation Construction Phase impact is Direct, Negative, Moderate and Permanent. Mitigation is the recording of the existing boundaries in position prior to the works, labelling the affected railings and granite plinths, granite piers, gates and other ironwork, prior to their careful removal to safe storage and reinstatement on the new line. Recording is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor. The architectural heritage specialist will oversee the labelling, taking-down and reinstatement of the affected gates, railings, piers, and masonry. Works to historic fabric will be carried out in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR.

In terms of reinstatement, as noted in response to item (i), if the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage its agent / valuer in preparing, negotiating and advising on compensation. 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 in line with any formal agreements and in accordance with any embedded mitigations identified in the EIAR or conditions/modifications from An Bord Pleanála in relation to the Proposed Scheme application. Method statements for works associated with the Blackrock College entrance gates and piers, such as traffic management and access, can be discussed as part of this process and all temporary CPO areas will be reinstated in consultation and agreement with the College.

3.2.5 CPO5 - BreastCheck Merrion St. Vincent's University Hospital (SVUH)

Description of the Proposed Scheme at this location

In order to achieve the Proposed Scheme objectives along this section of the corridor on Merrion Road, it is proposed to provide a footpath, cycle track, bus lane and general traffic lane in each direction. Inbound, the bus lane is curtailed on the approach to the junction to facilitate left turners into SVUH.

The existing road cross section in this location provides a footpath on each side of the road with one general traffic lane in each direction. An outbound bus lane is also provided with the inbound bus lane curtailed on approach to the junction to facilitate left turners into SVUH.

In order to achieve the desired design for the Proposed Scheme, permanent and temporary land acquisition is necessary from the SVUH site in the vicinity of the BreastCheck Merrion facility on Merrion Road. This is required to facilitate the cross section set out above. The land take required is shown in the following:

- The relevant extract of the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description Figures, as per Figure 3.20 below;
- the existing aerial views in Figure 3.21 and Figure 3.22 and
- the existing street view in Figure 3.23.

It is noted that since the aerial photography was gathered for the project in 2019, a new building was constructed within the SVUH site immediately adjacent the Proposed Scheme. This building was constructed under emergency legislation during the COVID-19 pandemic. Additional topographical survey was collected to support the design development, but the aerial photography was never updated. However, in order to illustrate the impacts on this plot, the approximate footprint of the building and the surrounding plinth is outlined in yellow in Figure 3.21. An additional more recent aerial image from Google maps is also presented for information in Figure 3.22.

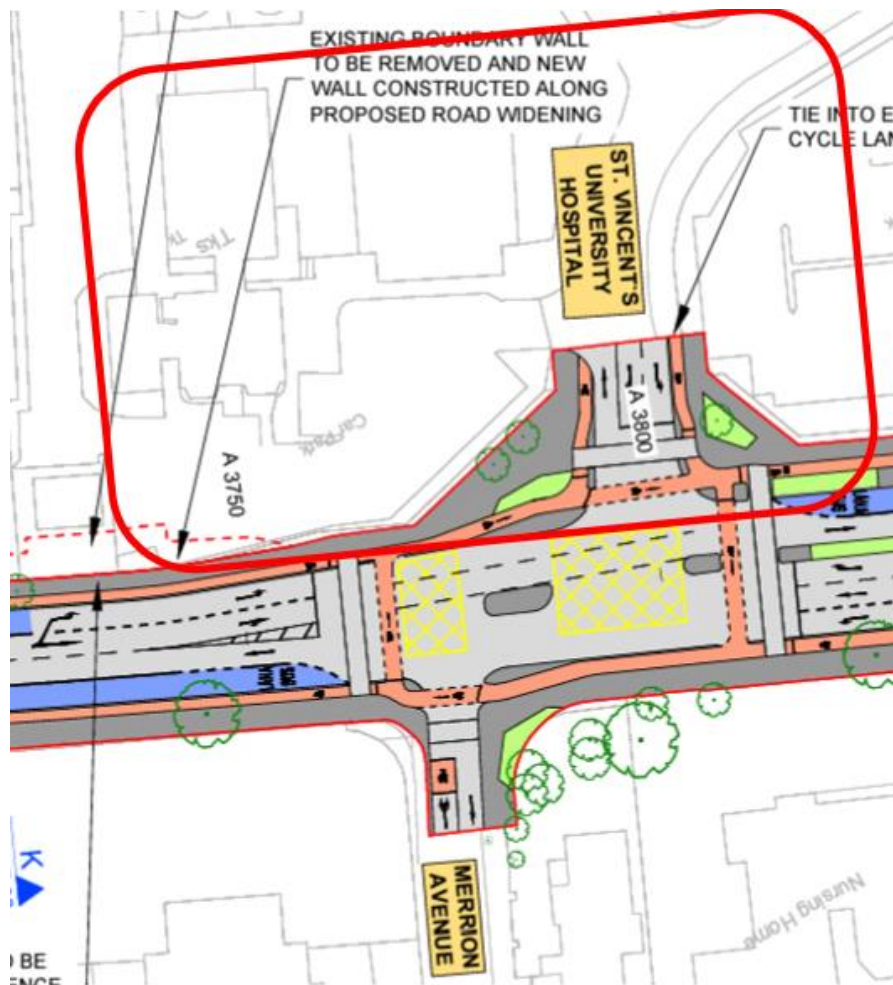


Figure 3.20: Proposed new Layout in vicinity of BreastCheck Merrion (SVUH)



Figure 3.21: Existing aerial view in vicinity of BreastCheck Merrion (SVUH) - (Image Source: Google)

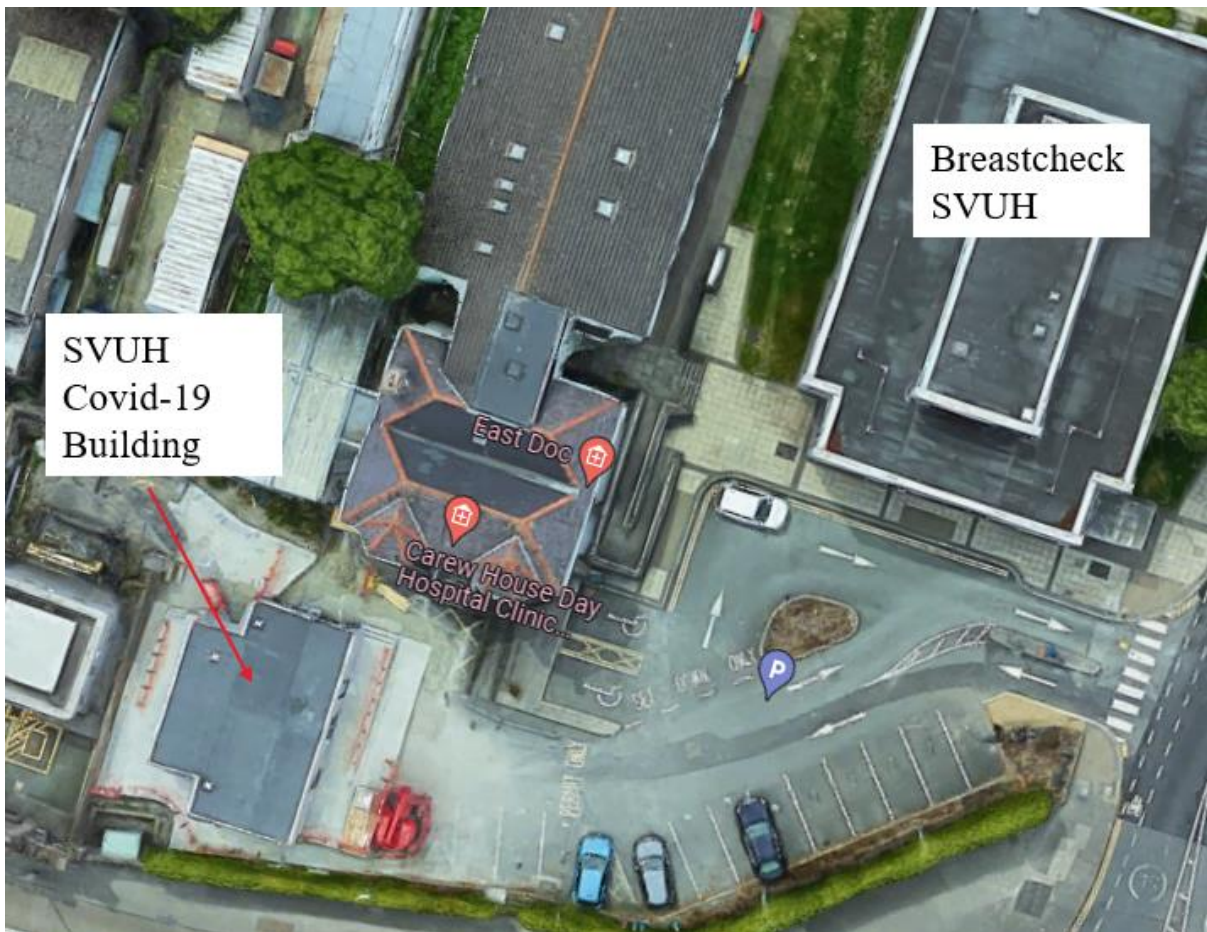


Figure 3.22: Existing aerial view in vicinity of BreastCheck Merrion (SVUH) showing new Structure within SVUH - (Image Source: Google)



Figure 3.23: Existing Street View in vicinity of BreastCheck Merrion (SVUH) - (Image Source: Google)

Summary of Objection

- i. Reduction in the number of car parking spaces

The submission received states that the proposed acquisition of land impacts negatively on the number of car parking spaces in the vicinity of the BreastCheck Merrion Unit and the broader SVUH site and wishes to seek assurances that any land acquisition will not impact negatively on the available space currently in use by the BreastCheck Merrion Unit.

Response to Objection Raised

- i. Reduction in the number of car parking spaces

The proposed land take at the SVUH will not result in any temporary or permanent loss of car parking in the vicinity of the BreastCheck Merrion Unit or at the campus. As can be seen in Figure 3.20 both temporary and permanent CPO is required only at the portion of SVUH lands which is adjacent the new structure with SVUH (between the new structure and the public footpath on Merrion Road) and does not extend as far as the current car parking area remaining (since the new structure was constructed). It is noted that the proposed temporary land acquisition line (broken red line in Figure 3.21 above) will run along the roadside facade of the new structure within SVUH but the temporary land take area will be returned to the owner upon completion of the Proposed Scheme.

3.2.6 CPO6 - Dalata Hotel Group Plc

Description of the Proposed Scheme at this location

In order to achieve the Proposed Scheme objectives along this section of the corridor on the R118 Merrion Road, it is proposed to provide a footpath, cycle track, bus lane and general traffic lane in each direction.

The existing road cross section in this location provides a footpath on each side of the road with one general traffic lane and a bus lane inbound and two general traffic lanes outbound merging to a single traffic lane and on road cycle lane.

In order to achieve the desired design for the Proposed Scheme, permanent and temporary land acquisition is required from the Clayton Hotel.

The land take required is shown in the following:

- The relevant extract of the EIAR Volume 3 Chapter 4 Proposed Scheme Description Figures, General Arrangement drawings in Figure 3.24,
- The existing aerial views in Figure 3.25 and
- The existing street view in Figure 3.26 below.

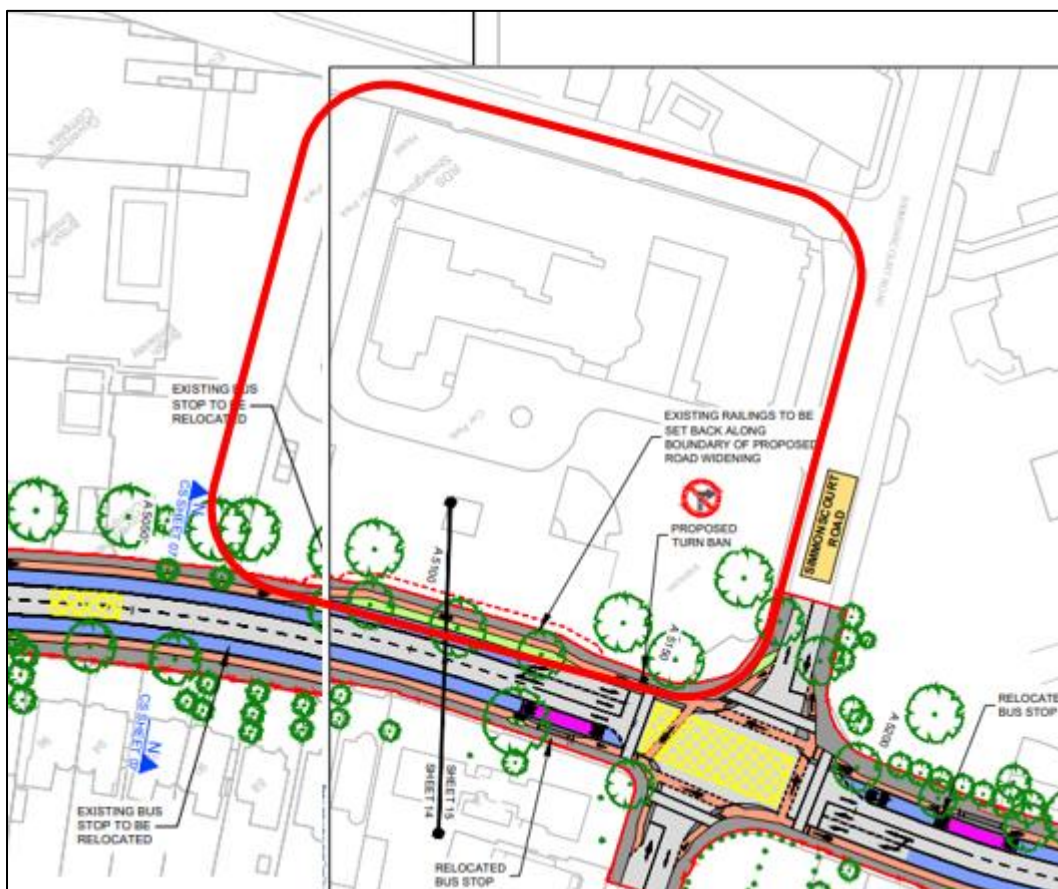


Figure 3.24: Proposed new Layout at the Clayton Hotel Merrion Road



Figure 3.25: Existing aerial view at the Clayton Hotel Merrion Road (Image Source: Google)



Figure 3.26: Existing Street View at the Clayton Hotel Merrion Road (Image Source: Google)

Summary of Objection

This objection raised one potential issue as follows:

- i. Impact on Heritage

The submission outlines the location of the Clayton Hotel, its current operation and the history of the building, as well as to outline the relevant planning history and local planning policy of the site.

The submission notes that the property is identified on the Council Register of Record of Protected Structures (reference 5089). The submission notes the guidance and objectives within the Dublin City Council Development plan with respect to such protected structures and highlights that the Development Plan makes specific reference to the curtilage of Protected Structures.

The submission goes on to outline concerns in relation to potential negative impacts on the Clayton Hotel, due to the proposed permanent and temporary land acquisition proposed. The submission notes the concerns of the property owners in relation to the proposed works to the front of their property, as well as in relation to the proposed CPO of their lands. The submission notes that the protected status of the property extends to the overall curtilage of the site, and as such the preservation of the sites external gardens and boundary fencing carries the same importance as that of the existing buildings. It is noted that the landscaped gardens form a unique and important setting and are visible on the Historic 25" map extract. It is also noted that the hotel building is purposefully set back from the R118 Merrion Road with a large buffer to the hotel from traffic.

The submission asserts that the CPO as submitted, would seriously injure the overall built heritage of the site as a whole and will have an undue negative impact on the Protected Structure. The submission further asserts that the exclusion of this element of the Proposed Scheme would have no material effect on the benefits of the Proposed Scheme.

Response to Objection Raised

I. Impact on Heritage

The NTA notes the concerns raised in relation to the proposed CPO in this location. The impact of the Proposed Scheme on this property is outlined in Section 16.4.3.1 of Chapter 16 of the EIAR, Architectural Heritage. This Section of the EIAR notes:

"The existing wrought and cast-iron railings and cut granite plinths to the boundary treatment of the former Masonic School, now the Clayton Hotel, Merrion Road (DCC RPS 5086) will be repositioned as a result of a land take to accommodate a new bus lane and cycle lane. The buildings are of Regional Importance and Medium Sensitivity. The Magnitude of the impact is Medium. The potential Construction Phase impact is Direct, Negative, Moderate and Permanent."

Section 16.5.1.1 of Chapter 16 of the EIAR, Architectural Heritage, further notes:

"Five locations were identified where the Proposed Scheme will directly impact on the boundaries of protected structures during the Construction Phase. These include the boundaries to 155 and 157 Merrion Road (DCC RPS 542 and 542a, odd numbers only), 151 to 153 Merrion Road (DCC RPS 5090, 5091, odd numbers only), the boundary treatment of the former Masonic School, now the Clayton Hotel, Merrion Road (DCC RPS 5086). The boundaries are to be repositioned to accommodate a bus and cycle lane. The pre-mitigation Construction Phase impact is Direct, Negative, Moderate and Permanent. The mitigation is for recording the existing boundaries in position prior to the commencement of construction works. The affected masonry, brickwork, railings, gates, gate posts, capping stones are to be labelled prior to their careful removal to safe storage, and their reinstatement on new lines, reinstating the existing details, and the relationships between the entrances and the historic buildings. Recording is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor. The architectural heritage specialist will oversee the labelling, taking down and reinstatement of the affected gates (which will be widened for safety reasons), the railings, piers, bricks and masonry. Works to historic fabric will be carried out in accordance with the methodology provided in Appendix A16.3 Methodology for Works

Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR. With mitigation, the impact magnitude is reduced from Medium to Low. The predicted residual impact is Direct, Negative, Slight and Temporary.”

The submission asserts that the exclusion of this element of the Proposed Scheme (i.e. the proposed land take) would have no material effect on the benefits of the Proposed Scheme.

Its exclusion, however, would result in the inability to provide the required cross section in this area which best meets the need of the scheme and would require the loss of 3 no. mature trees in front of the Clayton Hotel on the R118 Merrion Road. The Preferred Route Option Report, included in the Supplementary Information submitted, outlines the rationale for the proposed CPO in this location, as noted in Section 3.5.3.1 and reproduced below:

“In order to retain as many trees as practicable, a small area of land acquisition is proposed within the grounds of the Clayton Hotel Ballsbridge, Merrion Road, whereby a new footpath and cycle lane is proposed to run behind the existing trees. This would require land acquisition of a portion of the grass frontage and the relocation of the railing of this property which was not previously identified in the EPR Option.”

The trees in question have been surveyed and assessed as part of the Arboricultural Impact Assessment Report (AIAR), and have been categorised as follows:

- An 18m tall mature Lime displaying overall good condition, of Category B2 and with 20+ estimated remaining years;
- A 20m tall London Plane displaying overall good condition of category A2 and with 40+ estimated remaining years; and
- A 24m tall Horse Chestnut displaying overall good condition of category A2 and with 40+ estimated remaining years.

During the non-statutory public consultation of the Proposed Scheme, the removal of existing mature trees on Merrion Road was identified as a significant concern among members of the public. As such, in the development of the Preferred Route Option, this feedback was taken on board, and where reasonably practicable, healthy, mature trees were retained. Given the size, maturity and overall quality of these trees, and their contribution to the character of the Merrion Road in this location, the Proposed Scheme has been designed to retain them. The objective to retain these trees has been considered within the context of the impact on the adjacent property and in this case the Preferred Route Option has been to retain these trees. As outlined in the EIAR, the residual impact following mitigation is Direct, Negative, Slight and Temporary.

3.2.7 CPO7 - Draper Rhoda

Description of the Proposed Scheme at this location

In order to achieve the Proposed Scheme objectives along this section of the corridor at the junction of Nutley Lane and the R138 Stillorgan Road, it is proposed to provide a footpath, bus lane and general traffic lane in each direction. Westbound on Nutley Lane, the proposed bus lane is curtailed on the approach to the Stillorgan Road junction to facilitate left turners onto the Stillorgan Road. A two-way cycle track is also proposed on the southern side of Nutley Lane.

The existing road cross section in this location on Nutley Lane provides a footpath on each side of the road with one general traffic lane in each direction.

In order to achieve the desired design for the Proposed Scheme, permanent and temporary land acquisition is necessary along Nutley Lane. Additionally, in order to facilitate the design, it is necessary to close one of the two vehicular accesses to 118 Stillorgan Road – temporary CPO is required in order to facilitate these works.

The land take required is shown in the following:

- The relevant extract of the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description Figures, as per Figure 3.27 below;
- the existing aerial views in Figure 3.28, and
- the existing street view in Figure 3.29 and Figure 3.30.

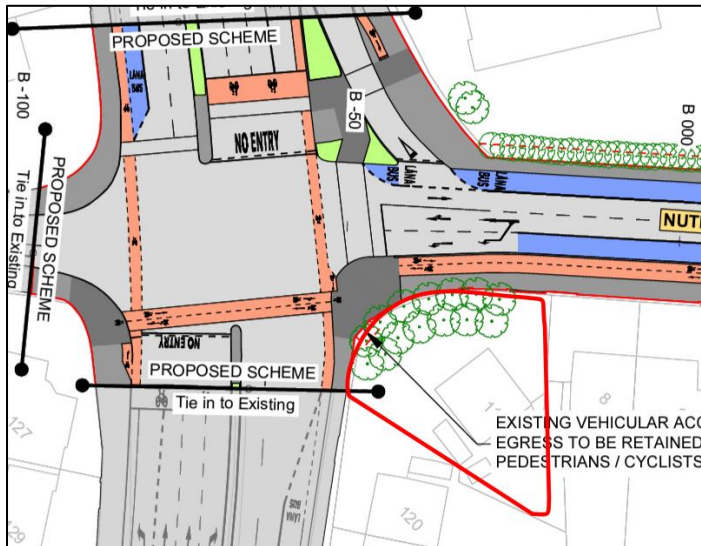


Figure 3.27: Proposed new Layout at 118 Stillorgan Road



Figure 3.28: Existing aerial view at 118 Stillorgan Road (Image Source: Google)

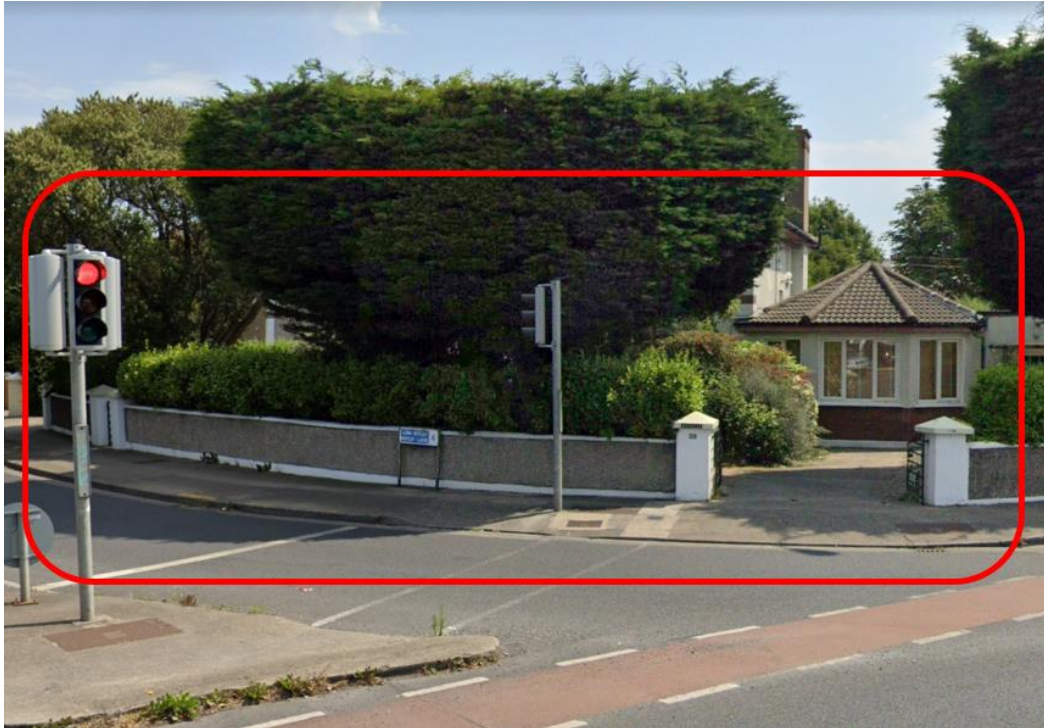


Figure 3.29: Existing Street View at 118 Stillorgan Road – view from Stillorgan Road (Image Source: Google)



Figure 3.30: Existing Street View at 118 Stillorgan Road – view from Nutley Lane (Image Source: Google)

Summary of Objection

This objection raised one potential issue as follows:

- i. Access/egress

The submission sets out the current operation of access and egress to the property via the two vehicular accesses one of which is on Stillorgan Road and one of which is on Nutley Lane.

The submission states that the access on Stillorgan Road is used for entry only, with the Nutley Lane access used for egress only. The submission raises concern that the proposed closure of the Stillorgan Road access to vehicular traffic would result in safety issues for vehicles turning right from Nutley Lane into the property, namely rear end type accidents.

Response to Objection Raised

i. Access/egress

As presented in the EIAR Chapter 4 Proposed Scheme Description Appendix the General Arrangement drawings Sheet 22 of 24, it is proposed to retain the existing vehicular access / egress to 118 Stillorgan Road, which is located within the Nutley Lane / Stillorgan Road junction, to pedestrians and cyclists only. As can be seen in the general arrangement drawings, a number of junction improvement measures are proposed in the vicinity of this access point including the removal of the slip lane from Nutley Lane to Stillorgan Road, the provision of a single stage crossing across Nutley Lane, and a dedicated cycle crossing across the Stillorgan Road southern approach to the junction. These proposals will materially affect the potential for continuation of the existing vehicular access to the property via this access gate on the corner of the junction as follows:

- The introduction of the dedicated cycle crossing across the southern approach of the Stillorgan Road will result in cyclists waiting in the area in front of the current access point along the path of travel to access the property. This conflict has been identified as a potential safety issue by the design team.
- The introduction of the dedicated cycle crossing in addition to other improvement measures at the junction (for example, shorter and wider pedestrian crossing across the Nutley Lane arm, dropped kerbs with tactile paving at all pedestrian crossing landings, tighter radii at the junction corners to act as a traffic calming measure) will result in additional traffic signal infrastructure (for example, signal poles, L-shaped tactile paving at pedestrian crossing landings) at the junction as shown in EIAR Chapter 4 Proposed Scheme Description Appendix the Junction System drawings Sheet 29 of 31. The presence of this signal infrastructure, in combination with the clear zones required for cyclists waiting to cross the R138 Stillorgan Road, would make the manoeuvre for vehicles entering and exiting 118 Stillorgan Road at this access/egress location more difficult and likely result in an increase in vehicular conflict with vulnerable road users on the corner of this junction, resulting in an unsafe environment for all road users.

It should also be noted that whilst the submission outlines that the access/egress at the corner of the junction is used for access only, it is still currently available for egress also, which present safety concern as it located within the signalised junction itself and is not a controlled manoeuvre. The egress onto Nutley Lane is located behind the stop line and motorists can enter the junction from Nutley Lane using the safety of the traffic signal control at the stop line on Nutley Lane.

It should also be noted that motorists gaining access to 118 Stillorgan Road from the south (R138 Stillorgan Road) or from the west (Greenfield Park) require what the design team consider to be unsafe manoeuvres to reach the access at the corner of the junction.

Based on the above, it was determined that the most appropriate arrangement for access/egress to the property at 118 Stillorgan Road was to retain the access/egress on the corner of the junction for pedestrians and cyclists only and that all vehicular access/egress to/from 118 Stillorgan Road would make use of the existing vehicular access to the property off Nutley Lane, which will remain unaffected by the Proposed Scheme.

A vehicular link exists also within the front garden of 118 Stillorgan Road, between both driveways, meaning that the parking area directly adjacent to the existing access/egress on the corner of the junction can still be available for use by the occupiers of 118 Stillorgan Road.

The access point off Nutley Lane is located approximately 30m from the junction with the R138 Stillorgan Road. While there is no guidance on appropriate distances for property access from junctions, it is considered that 30m allows for safe manoeuvring of vehicles into and out of the property and is a scenario that is not uncommon in this area. In fact, the vehicular access to the neighbouring 8 Nutley Lane is located directly adjacent to the existing vehicular access to 118 Stillorgan Road on Nutley Lane and presents the same environment for right turners to the driveway, as per Figure 3.31 below, and is not considered a safety concern by the design team. It is further noted that the Road Safety Audits undertaken for the Proposed Scheme, included as Appendix M of the Preliminary Design Report provided in the Supplementary Information, did not highlight any safety issues with the proposed arrangement at 118 Stillorgan Road in this regard.



Figure 3.31: Existing Street View at 118 Stillorgan Road – view from Stillorgan Road (Image Source: Google)

It is noted that throughout the project there have been several communications (letter, emails and telephone calls) with Ms Draper with regard to the proposals at 118 Stillorgan Road.

3.2.8 CPO8 - Elm Court Management DAC

Description of the Proposed Scheme at this location

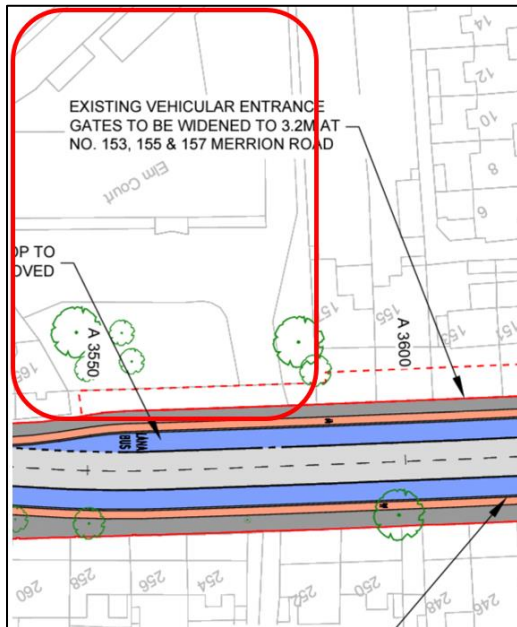
In order to achieve the scheme objectives along this section of the corridor, it is proposed to provide a footpath, cycle track, bus lane and general traffic lane in each direction.

The existing road cross section in this location provides a footpath on each side of the road with one general traffic lane and a bus lane inbound, and two traffic lanes outbound.

In order to achieve the desired design for the Proposed Scheme, permanent and temporary land acquisition is required from the grassed area between the boundary wall at Elm Court Apartments and the public footpath.

The land take required is shown in the following:

- The relevant extract of the EIAR Chapter 4 Proposed Scheme Description Appendix the General Arrangement drawings in Figure 3.32,
- The existing aerial views in Figure 3.33 and
- The existing street view Figure 3.34 below.



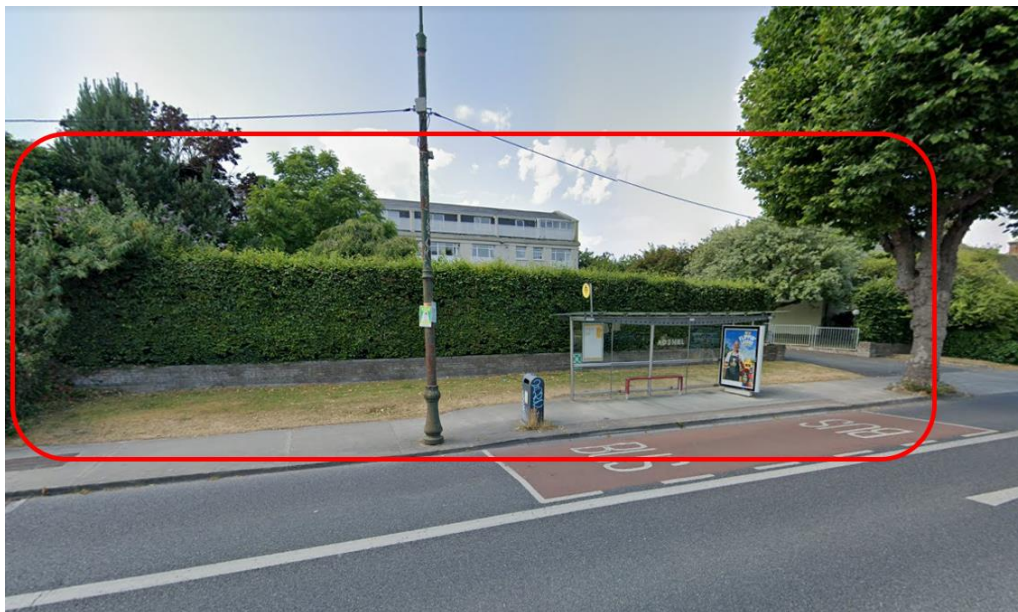


Figure 3.34: Existing Street View at Elm Court Apartments (Image Source: Google)

Summary of Objection Raised

This objection raised nine potential issues as follows:

i. Environmental Impact

The submission states that the Environmental Impact Assessment and supporting information has not been provided to them for consideration.

ii. Traffic and Transport

The submission states that the NTA has not provided reassurance that there will not be a significant negative impact on traffic.

iii. Proof of Need

The submission states the NTA has not provided reasons as to the need of the land.

iv. Parking Space

The submission states that the proposals would cause potential parking difficulties to residents, people with disabilities etc.

v. Local Economic Impact

The submission states that high volumes of car traffic may impede local business's ability to trade.

vi. Impact on the Land

The submission states 'Whether the NTA plans to cut down trees etc., whether residence will lose part of their front gardens to accommodate the project' – it is understood that this statement suggests that this information has not been provided by the NTA. The submission also states that the NTA has not confirmed the impact of the scheme on the hedge and electric gate at the access to the property.

vii. Access to the Village

The submission states that they have not been informed whether there will be a one-way system proposed and whether residents will lose direct access to the village by car.

viii. Compensation for usage of land

The submission states that the NTA have not provided a valuation for the land to be acquired at today's prices. It is submitted that the NTA should provide compensation at the value of the land at today's prices rather than the valuation at the time of notice to treat if this value is higher.

ix. Construction Programme

The submission states that the work time schedule for constructing the corridor has not been provided.

Response to Objection Raised

It is noted that the majority of items raised in this submission are related to general items across the scheme rather than specifics associated with the CPO at the property. All items raised are discussed in the following sections.

i. Environmental Impact

A full and comprehensive Environmental Impact Assessment Report has been prepared to fully assess and present the impacts of the Proposed Scheme. As per the cover letter accompanying the CPO notice issued to all parties listed in the CPO, the Environmental Impact Assessment Report, Natura Impact Statement and CPO documentation can be found at the National Transport Authority website for the Belfield / Blackrock to City Centre Core Bus Corridor Scheme at www.belfieldblackrockscheme.ie. This is reiterated in the notice itself. Furthermore, as set out in item 10 of the CPO notice, the EIAR and accompanying documentation was available for inspection at both the NTA and An Bord Pleanála offices between 17th May and 12th July.

ii. Traffic and Transport

Chapter 6 of the EIAR provides a comprehensive assessment and review of all traffic and transport impacts associated with the Proposed Scheme. The assessment for general traffic is presented in detail in section 6.4.6.2.8 and is summarised in section 6.4.6.3. It is concluded that overall there would be a reduction in general traffic flows along the Proposed Scheme which would result in a Positive, Moderate and Long-term effect whilst the impact of the redistributed general traffic within the surrounding road network will have a Negative, Slight and Long-term effect. Thus, overall, there will be no significant deterioration in the general traffic environment in the study area as a consequence of meeting the scheme objectives of providing enhanced sustainable mode priority along the direct study area.

iii. Proof of Need

Section 4.5.2.1 of EIAR Chapter 4 Proposed Scheme Description describes the proposals for the section of the route between Booterstown Avenue and Nutley Lane, where in the vicinity of the Elm Court Apartments, it is proposed to provide a bus lane, cycle track and a general traffic lane in each direction. There are currently only four traffic lanes on this section of road and to facilitate proposed cycle tracks, land acquisition is required from the Elm Court Apartments and adjacent property. For clarity, the proposed cross section is not feasible without CPO at this location.

It is noted that the proposed permanent and temporary CPO at Elm Court Apartments is within the open space (grassed area) between the boundary wall and the public footpath.

The proposed permanent acquisition at this location ranges from 0.4m to 1.2m in width and the proposed temporary acquisition ranges from 3.1m to 4.0m.

It is further noted that the existing hedge and electric gate will not be affected by the works with the arrangement retained as existing. This is demonstrated in EIAR Chapter 4 Proposed Scheme Description Appendix the Fencing and Boundary Treatment drawings 10 of 23 where no boundary works are proposed at this location.

iv. Parking Space

The detail in the submission under this heading is vague stating only 'Potential parking difficulties that the proposal would cause to residents, people with disabilities etc.' We understand this to be a concern over the loss of car parking in the vicinity of the Elm Court Apartments.

Section 6.4.6.1.3.4 of EIAR Chapter 6 Traffic and Transport sets out an assessment of car parking loss in the scheme section between Booterstown Avenue and Nutley Lane. Table 6.33 presents a summary of the car parking loss in this section. In total there will be a net reduction of 8 car parking spaces in this section. However, within the section between Trimleston Avenue and Nutley Lane where the Elm Court Apartments are located, there will be a net increase of 2 car parking spaces.

v. Local Economic Impact

A broad statement is provided in the submission with regard to concern over impact on local economy as follows 'Along with the loss of parking spaces, we were not informed as to whether there be high volume of car traffic that may be impeded the local business ability to trade'.

Chapter 6 of the EIAR provides a detailed assessment of traffic and transport related items with a summary of the traffic assessment provided in response to item ii.

Chapter 10 Population assesses the potential community and economic impacts on the human population associated with the Construction and Operational Phases of the Proposed Scheme. As set out in Section 10.2.1.2, the economic assessment considers impacts on individual commercial businesses along the Proposed Scheme within the community areas listed in Section 10.2.1.1, as well as any businesses in the surrounding road network that are located on a road that is expected to experience a moderate or greater traffic impact from displaced traffic in the AM and PM peak hours. The impacts are considered as two assessment topics: Commercial amenity; and Commercial land use and accessibility.

Section 10.6.2 summarises the impacts on commercial properties along the Proposed Scheme. As outlined in Table 10.14, the Proposed Scheme will deliver positive impacts in terms of accessibility to community facilities and commercial businesses for pedestrians, cyclists and bus users during the Operational Phase. The Proposed Scheme is also expected to benefit individuals and businesses whose workers live along the corridor. Retail and leisure businesses along the route could gain a double benefit from both increased sales and improved staff productivity (see Appendix A10.2 in Volume 4 of this EIAR). These improvements will help to achieve the aims and objectives of the Proposed Scheme by providing an attractive alternative to the use of private vehicles and promoting a modal shift to walking, cycling and public transport, allowing for greater capacity along the corridor to access residential, community and commercial receptors.

As discussed in Appendix A10.2 in Volume 4 of this EIAR, the Proposed Scheme will also ensure to connect people with essential services such as healthcare facilities and jobs (EY 2021). In order to accommodate the Proposed Scheme and to ensure it can be readily utilised by sustainable modes of transport, localised significant impacts from permanent land take are expected on a small number of properties. Negative (not significant) impacts are anticipated on private vehicles travelling in the surrounding road network.

However, the design of the Proposed Scheme, which is a result of a detailed design iteration process ensures that the surrounding road network will have the capacity to accommodate the redistributed traffic during Operational Phase whilst still achieving the aims and objectives of the Proposed Scheme. Accordingly, it is concluded that the Proposed Scheme will deliver strong benefits for users of sustainable modes of transport, with positive accessibility impacts expected for all community areas in the study area and align with specific objectives identified in Section 10.1.

vi. Impact on the Land

Although unclear, the submission appears to suggest that the NTA has not provided details of trees to be removed as part of the Proposed Scheme and whether private gardens will be affected.

A detailed Arboricultural Impact Assessment report is presented Appendix A17.1 of the EIAR. This report and associated drawings presented in Appendix C of that report, detail every tree to be retained or removed as part of the Proposed Scheme.

In relation to impact on private gardens, the Proposed Scheme and accompanying CPO identify all areas of private land which will be acquired to facilitate the Proposed Scheme. This includes areas of private gardens. The areas to be acquired can be identified on the Compulsory Purchase Order Deposit maps submitted with the CPO application.

vii. Access to the Village

Chapter 4 of the EIAR describes the Proposed Scheme including any traffic management measures proposed. This detail can be viewed EIAR Chapter 4 Appendix the General Arrangement drawings. It is unclear from the submission what village is being referred to and on what road a one-way system is being queried, but no one-way systems are proposed in the vicinity of the Elm Court Apartments.

viii. Compensation for usage of land

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage your its agent / valuer in preparing, negotiating and advising on compensation. 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 in line with any formal agreements and in accordance with any embedded mitigations identified in the EIAR or conditions/modifications from An Bord Pleanála in relation to the Proposed Scheme application.

It is further noted that the item 14 in the CPO notice issued to the landowner states “If land to which the order, as confirmed by either the Board or the NTA, relates is acquired by the NTA, compensation for the land will be assessed in respect of the acquisition as the value of the land at the date that the relevant notice to treat is served.”

ix. Construction Programme

Chapter 5 of the EIAR describes and assesses the construction activities associated with the Proposed Scheme. Section 5.4 states that the total Construction Phase duration for the overall Proposed Scheme is estimated at approximately 24 months. However, construction activities in individual sections will have shorter durations as outlined in overview of construction works presented Section 5.3. The programme identifies the approximate duration of works at each section. The location of each section / sub-section along the Proposed Scheme is shown in Figure 5.1 in Volume 3 of this EIAR.

3.2.9 CPO9 - Elm Park Golf and Sports Club

Description of the Proposed Scheme at this location

In order to achieve the Proposed Scheme objectives along this section of the corridor on Nutley Lane, it is proposed to provide a footpath, bus lane and general traffic lane in each direction. A two-way cycle track is also provided on the southern side of the carriageway.

The existing road cross section in this location provides a footpath on each side of the road with one general traffic lane in each direction. On-street car parking is also provided on the southern side of the carriageway.

In order to achieve the desired design for the Proposed Scheme, permanent and temporary land acquisition is required from the Elm Park Golf and Sports Club.

The land take required is shown in the following:

- The relevant extract of the EIAR Volume 3 Chapter 4 Proposed Scheme Description Figures, General Arrangement drawings in Figure 3.35 and Figure 3.36
- The existing aerial views in Figure 3.37 and,
- The existing street view in Figure 3.38 and Figure 3.39 below.

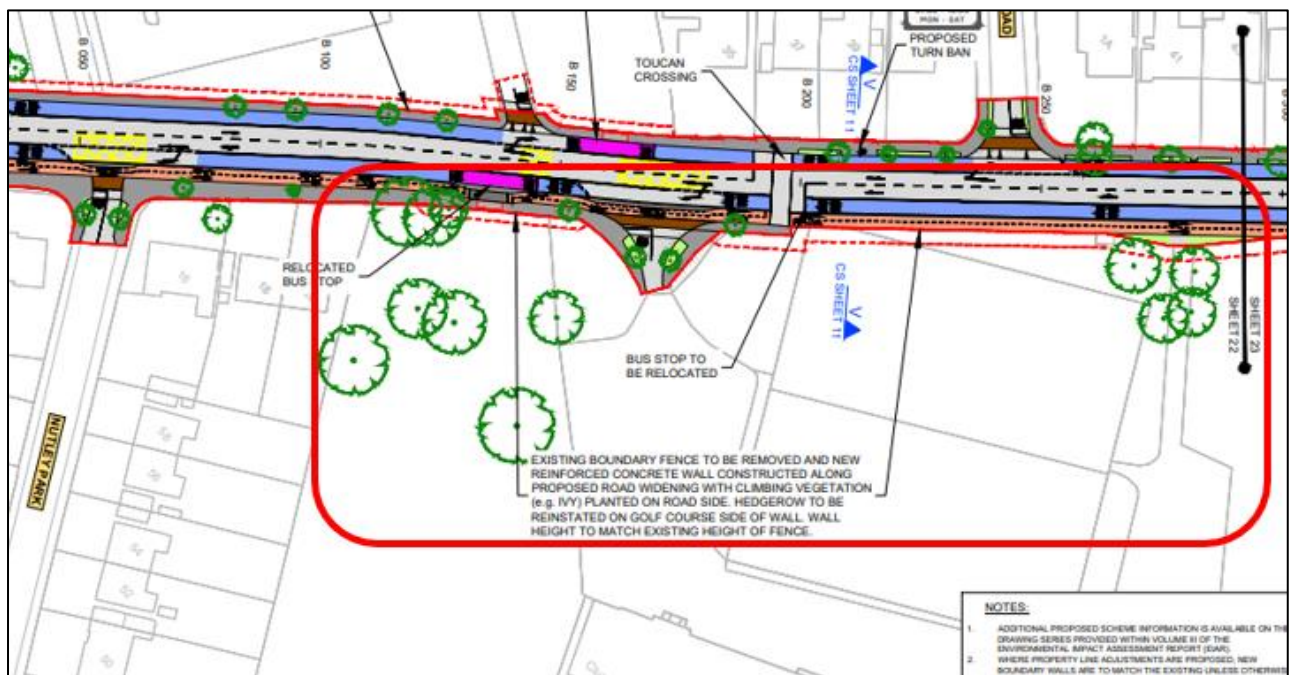


Figure 3.35: Proposed new Layout at Elm Park Golf and Sports Club (South of Nutley Park)

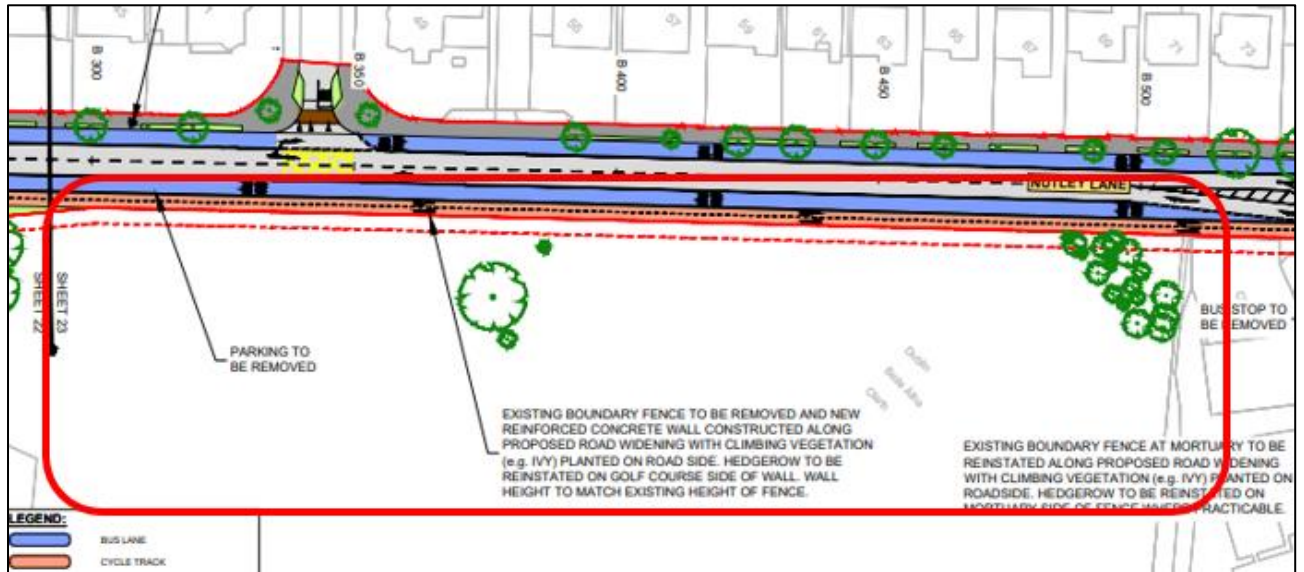


Figure 3.36: Proposed new Layout at Elm Park Golf and Sports Club (North of St. Vincent's Hospital)



Figure 3.37: Existing aerial view at Elm Park Golf and Sports Club (Image Source: Google)

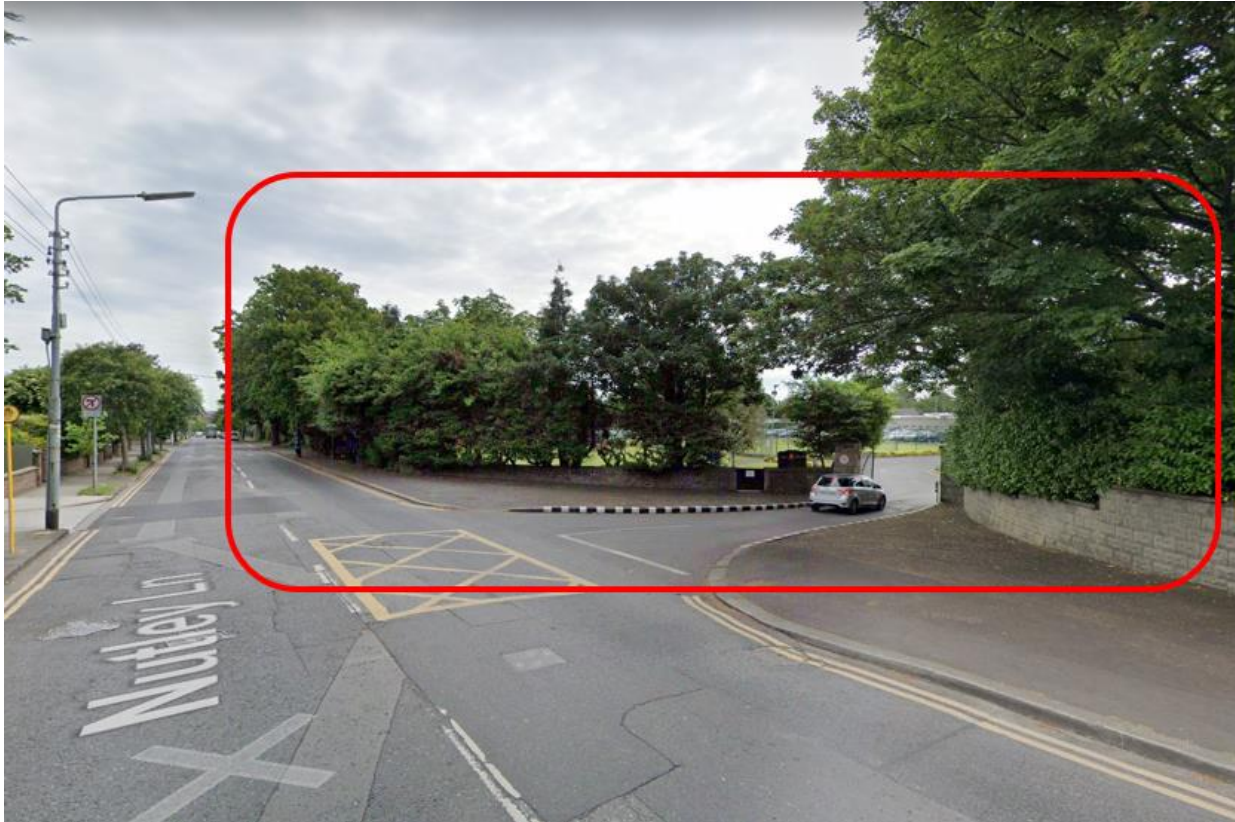


Figure 3.38: Existing Street View at Elm Park Golf and Sports Club – looking north at vehicular entrance to property (Image Source: Google)

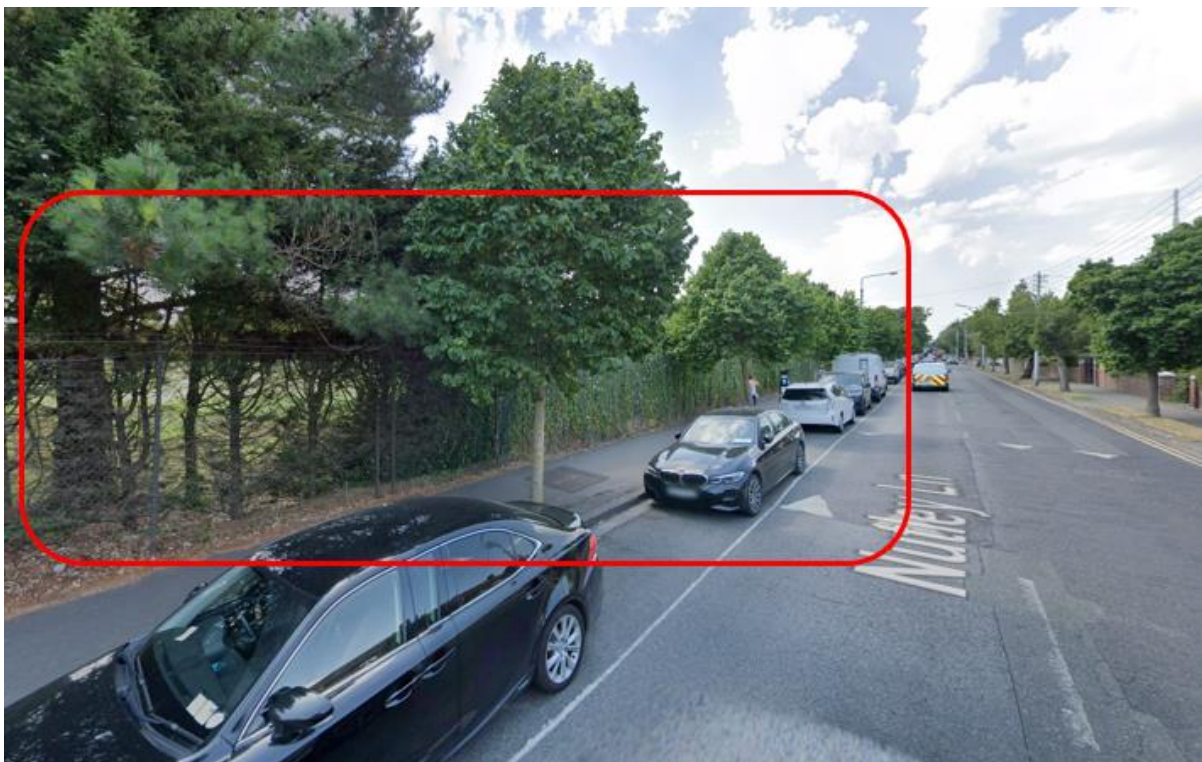


Figure 3.39: Existing Street View at Elm Park Golf and Sports Club – looking south at northern end of site (Image Source: Google)

Summary of Objection

This objection raised six potential issues as follows:

- i. Need and justification for the Nutley Lane link;

The submission questions the need for the proposed Nutley Lane link and suggests that the submitted document does not adequately justify its inclusion.
- ii. The impacts of the proposed CPO to Elm Park Golf and Sports Club including the main entrance, the 1st Tee, Tennis Court 9, the Golf Practice area and associated bunkers, the 4th and 7th tee areas, the 6th Green and bunker and the Services Entrance;

The submission notes that the loss of land may have an impact on the golf course rating which may impact the attractiveness of the club to new/continued membership. Concern is also noted that the loss of land would impact on the run-off/ retrieval areas at the tennis courts and that this loss will impact the attractiveness for members and the ability to attract elite players.
- iii. Traffic Safety at both the Main Entrance and the Service Entrance;

The submission notes concern over the safety and capacity at each junction. It is suggested that inadequate visibility exists at these junctions.
- iv. Loss of Mature Trees along the Elm Park Golf and Sports Club side of Nutley Lane

The submission notes concern over the loss of trees along Nutley Lane in the vicinity of the Golf and Sports Club suggesting an alternative arrangement could be adopted to retain these.
- v. Impacts on temporary works zones and disturbance during works especially but not restricted to access and security.
- vi. Reduced Cross-Section along Elm Park Golf and Sports Club

The submission suggests that a reduced cross-section along Nutley Lane would result in less or no impact on the Elm Park Golf and Sports Club lands.

The submission notes that the impacts of the Proposed Scheme for Elm Park Golf and Sports Club, in terms of significance and duration for a significant community-based sports club, including the physical and financial effects upon sports facilities and the viability of the club, have not been considered at all in the assessments of environmental effects upon Population and Human Health in Chapters 10 and 11 of the EIAR.

The submission notes that there does not appear to be a strong business case for the Nutley Lane link and that the cost-benefit ratio in terms of physical and ecological impacts has not been resolved in the documentation provided to support the scheme as designed.

The submission requests that the Nutley Lane link be removed by An Bord Pleanála or withdrawn from the scheme entirely by NTA as the case for it has not been proven. If it is to be retained, the submission recommends that it must be with a reduced cross-section along the Elm Park Golf and Sports Club frontage, to mitigate severe impacts upon the club grounds and operations and upon the local environs.

Response to Objection Raised

- i. Need and Justification for the Nutley Lane link

EIAR Volume 2 Chapter 2 Need for the Proposed Scheme outlines the policy context that underpins the Proposed Scheme as well as the regional and local transport need for the Proposed Scheme. Section 2.2.1.4 notes the following:

“To inform the preparation of the GDA Transport Strategy, the NTA prepared the Core Bus Network Report (NTA 2015) for the Dublin Metropolitan Area, which identified those routes on which there needed to be a focus on high capacity, high frequency and reliable bus services, and where investment in bus infrastructure should be prioritised and concentrated. The Core Bus Network is defined as a set of primary orbital and radial bus corridors which operate between the larger settlement centres in the Dublin Metropolitan Area.”

Section 2.2.1.6 outlines the need for the Nutley Lane link as part of the Core Bus Corridor Infrastructure Works. It notes that across the Core Bus Network, the corridors are generally proposed along established radial corridors into and out of the city. However, in developing the Core Bus Network a significant demand was identified for travel between UCD and Ballsbridge. It is for this reason that the Core Bus Network proposed a route connecting the radial corridors on which these destinations lie, namely the “Bray – UCD – Donnybrook” corridor and the “Dún Laoghaire to City Centre” corridor. The Proposed Scheme connecting Belfield and Blackrock to the City Centre serves a significant public transport demand between these locations.

As noted in Section 2.2.2 of EIAR, there are a number of high frequency public bus services along the routes to be improved by the Proposed Scheme. Many of these services suffer from journey time unreliability, particularly in peak times, due to the lack of bus priority provision. The route from UCD via Nutley Lane and into the City Centre via Ballsbridge along the Merrion Road, already has a number of existing public bus services (including the 47 and 27x bus routes), as well as private services including shuttle buses connecting UCD with other transport services such as the DART at Sydney Parade. These services suffer from poor journey time reliability, again particularly at peak commuter times when demand is highest as there are currently no bus lanes on Nutley Lane. The UCD Belfield to DART shuttle bus operates from 8:00 to 10:10 and 16:00 to 18:10, while the 27x leaves the UCD terminus at 7:35 and 17:05. In addition to the level of service improvements the Proposed Scheme will facilitate for existing bus services, the ongoing Dublin Area Bus Network Redesign will see continued investment in bus services into the future, which will also be afforded similar journey-time reliability and therefore improve their attractiveness as an alternative to private car usage.

As part of the BusConnects revised bus network proposals, the Proposed Scheme will serve the B-Spine bus services. Image 2.7 in Chapter 2 of the EIAR which is reproduced below, is an extract from New Dublin Area Bus Network Map (NTA 2020) and shows the B-Spine interface with the Proposed Scheme between Monkstown Road and Nutley Lane (B3 and B4), along Nutley Lane (B1 and B2), and from Nutley Lane to the City Centre (B1, B2, B3 and B4). It is noted that both the B1 and B2 routes along Nutley Lane are proposed to operate with 15 minute intervals between buses, and the L13 route is proposed to operate with 60 minute intervals. This equates to 18 buses per hour on Nutley Lane in both directions.

It is further noted that the benefits of the scheme in terms of bus passenger volumes is clearly demonstrated in Chapter 6 of the EIAR. Diagram 6.11 in Section 6.4.6.2.3.1 of the EIAR (reproduced in Figure 3.40 below) presents the passenger loading profile the AM Peak Hour in the inbound direction in 2028.

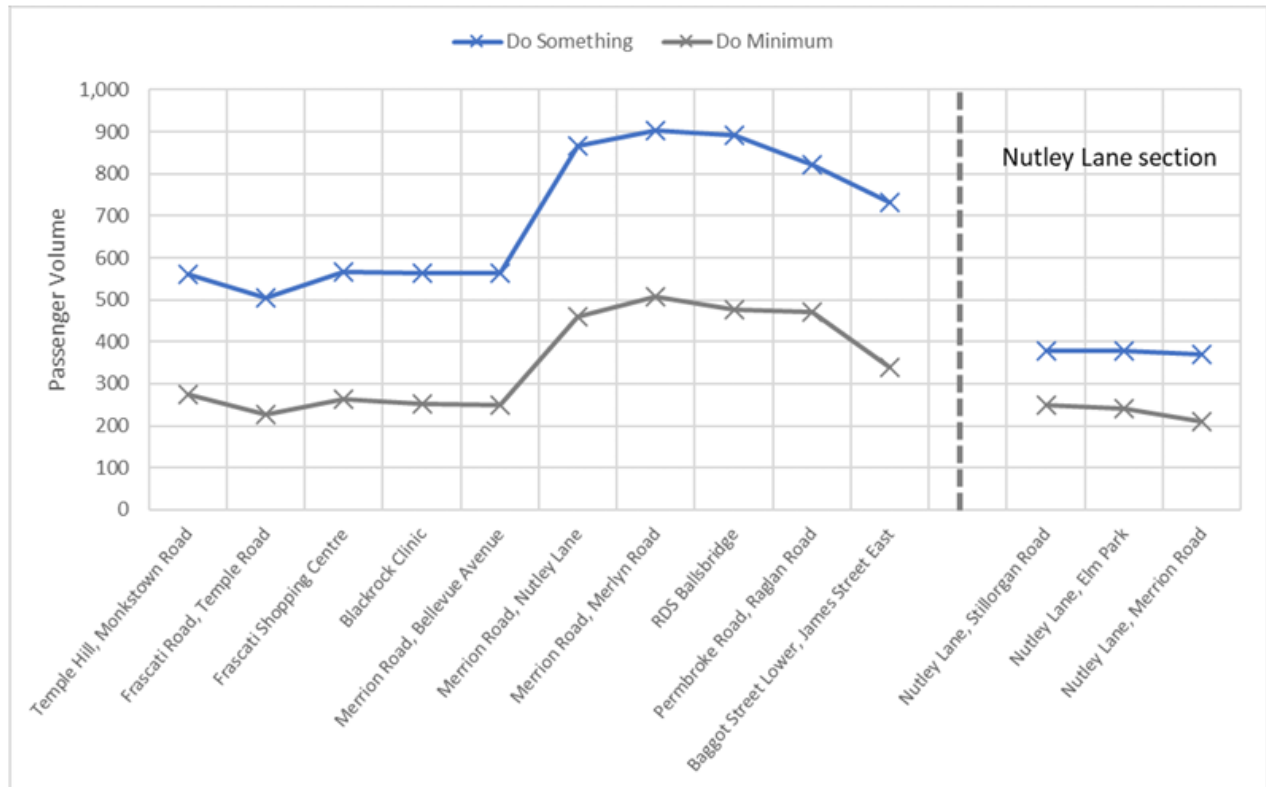


Figure 3.40: 2028 AM Peak Hour Passenger Volume Along Proposed Scheme (inbound direction)

As can be seen in Figure 3.44 a higher level of bus passenger loading can be seen along the Proposed Scheme with c.150-200 additional passengers being carried along Nutley Lane in the AM Peak hour in 2028. This increases to c. 300-350 additional passengers in the AM Peak hour in 2043 as shown in Diagram 6.12 in the EIAR (reproduced in

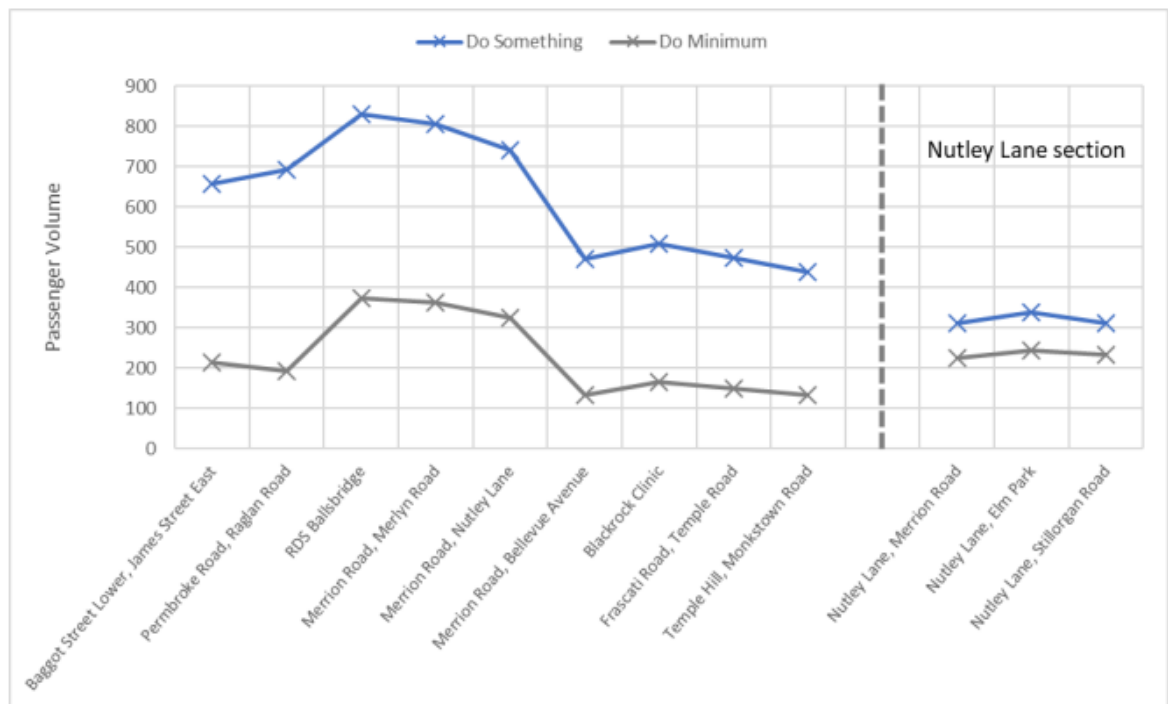


Figure 3.41 below). The substantial increase in passengers using the corridor at this location as a result of the proposed scheme further highlights the need for the scheme along Nutley

Lane. It is noted that as outlined in Section 6.3.1 of Chapter 6 of the EIAR, the Do Minimum scenario includes all other elements of the BusConnects Programme of projects (apart from the CBC Infrastructure Works elements), including the Dublin Area Bus Network Redesign. As such, the benefits outlined below are solely due to the infrastructure improvements proposed under the Proposed Scheme.

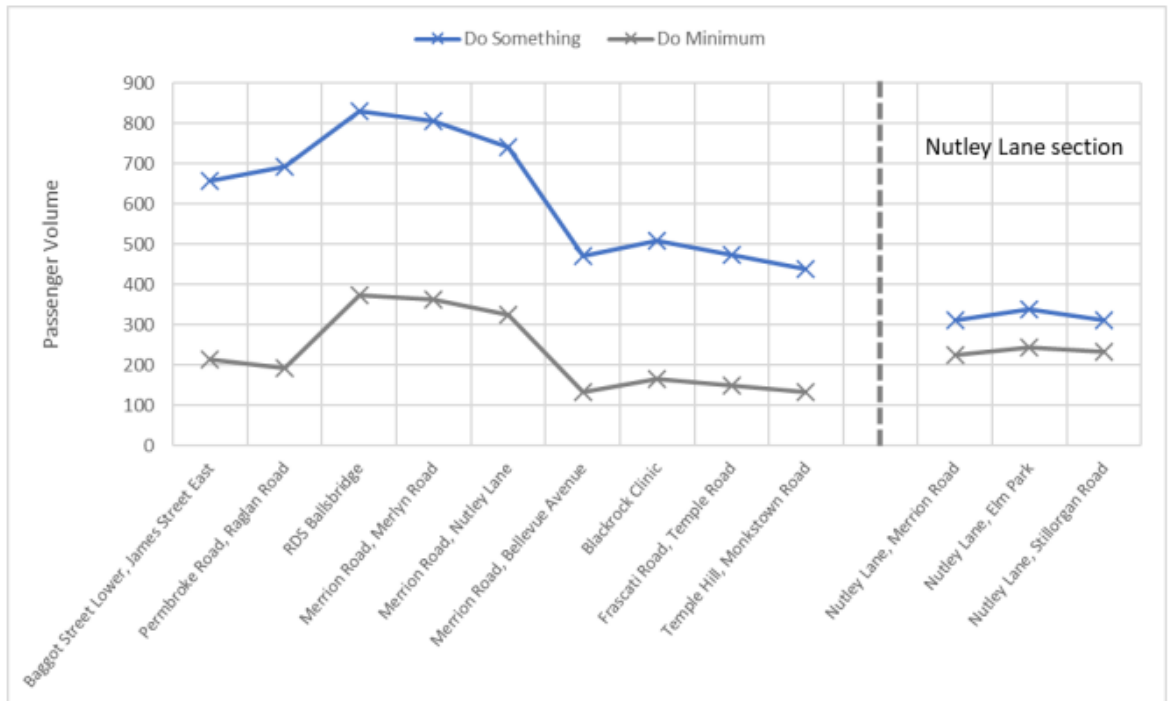


Figure 3.41: 2043 PM Peak Hour Passenger Volume Along Proposed Scheme (outbound direction)

Demand for travel by bus is anticipated to continue to grow in this corridor into the future, in line with population growth. The bus priority measures forming part of the Proposed Scheme are required to accommodate this growth in travel demand and to facilitate the revised bus network (B-Spine) by providing journey time savings and reliability for passengers. This will ensure that the projected growth in passenger demand is facilitated and protected from increasing congestion, providing resilience which can in the future cater for additional bus service provision.

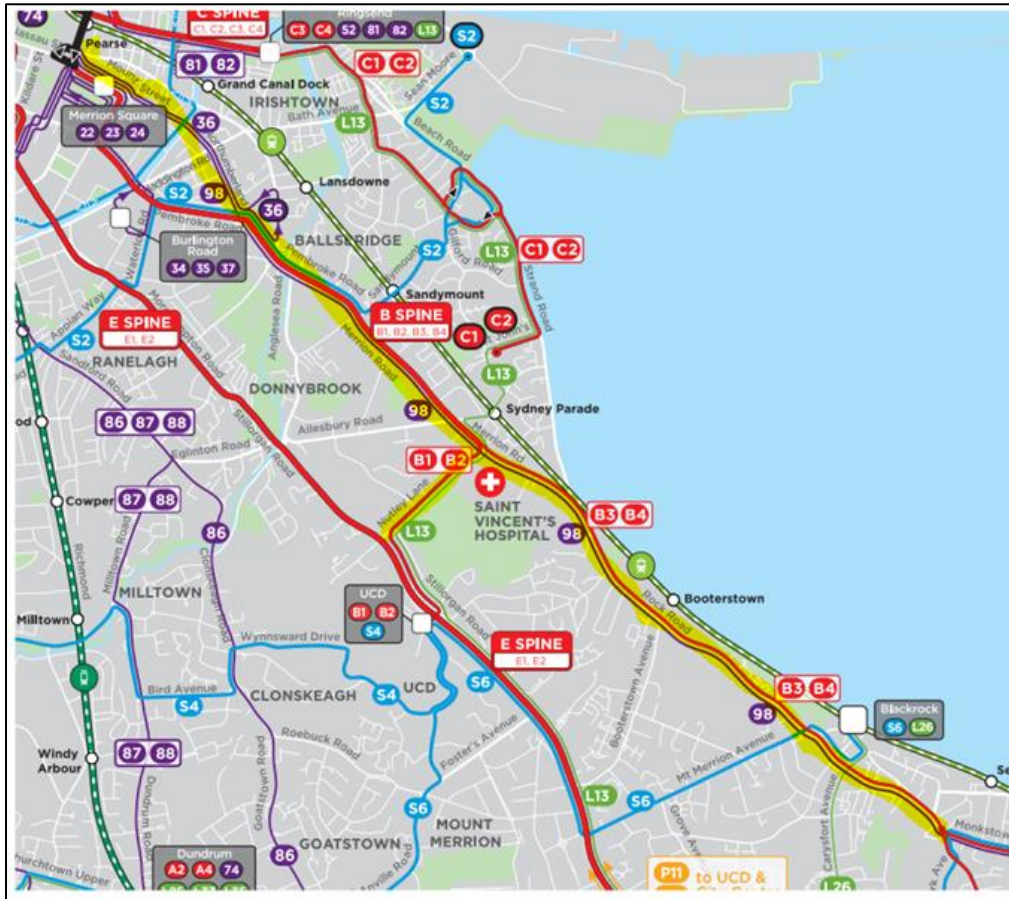


Figure 3.42: Extract from New Dublin Area Bus Network Map (NTA 2020)

In terms of cycling, EIAR Volume 2 Chapter 2 Section 2.2.1.3 outlines the need for the Nutley Lane link as part of the cycle network. This section notes that the Greater Dublin Area (GDA) Cycle Network Plan was adopted by the NTA in early 2014, following a period of consultation with the public and various stakeholders. This plan forms the strategy for the implementation of a high quality, integrated cycle network as set out in the GDA Transport Strategy. An extract from the GDACNP is shown in Figure 3.43, which highlights the Proposed Scheme in the context of the planned cycle network. There are two primary cycle routes (Cycle Route 13 and Cycle Route 13A) identified running along the majority of the Proposed Scheme, as well as Secondary Cycle Routes on Nutley Lane (S04) and Fitzwilliam Street (C7).



Figure 3.43: Extract from Greater Dublin Area Cycle Network Plan (Proposed Scheme Highlighted in Yellow for Information)

The GDA Cycle Network Plans also aims to provide high quality links to DART stations from the surrounding areas in order to increase the catchment area of these stations, assuming high quality cycle parking is available at all stations. One such example is the route from UCD to Sydney Parade, which was identified within the GDA Cycle Network Plan as requiring further development – noting that Nutley Lane (which is a key link in this route) currently has no cycle facilities. Cycle facilities in the Proposed Scheme will increase to 100% in both directions, all of which being segregated with the exception of localised tie-ins to the existing of environment. Given its status as a Secondary Cycle Route and its proximity to large catchments such as RTE, St. Vincent’s University Hospital, and UCD, and its function as a key connection to the DART, a high-quality cycle facility is required along Nutley Lane.

In summary, the need for high quality bus and cycle facilities along Nutley Lane has been demonstrated in Chapter 2 of EIAR which identifies the need to serve both existing and future planned bus services along the route, as well as providing a high-quality cycle facility that realises the ambition set out in the GDACNP.

ii. The Impacts of the proposed CPO to Elm Park Golf and Sports Club

The NTA has engaged with Elm Park Golf and Sports Club since 2018 in respect of the Emerging Preferred Route along Nutley Lane and will continue to work with them to mitigate potential impacts and concerns during the development of design options along Nutley Lane. This engagement has included discussions and on-site meetings with the engineering design team relating to tee boxes, embankments surrounding greens and the tennis courts. As a result of this engagement, the Preferred Route Option proposes to remove the pedestrian footpath on the golf course side of Nutley Lane to minimise the impact on the golf course.

The boundary treatment proposes to replace the existing boundary fence and hedgerow with a new reinforced concrete wall with climbing vegetation (e.g. ivy) planted on the road side and a new hedgerow reinstated on the golf course side. This option was chosen to minimise the impact of the Proposed Scheme on the Golf and Sports Club while maintaining the same level of privacy for the golf club. The concerns outlined by Elm Park Golf and Sports Club regarding the main entrance and the secondary entrance can be adequately resolved and the Proposed Scheme should not result in changes to the Par rating of any hole.

Chapter 10 (Population) of the EIAR has considered the potential community and economic impacts on the human population associated with the Construction and Operational Phases of the Proposed Scheme. Section 10.3.2.1 recognises Elm Park Golf and Sports Club as community receptor, which may attract a large number of users.

Section 10.4.3.1.1 identifies that Elm Park Golf and Sports Club is expected to experience a Negative, Moderate and Short – Term impact on amenity from a combination of traffic, air quality, noise and visual impacts, during the Construction Phase.

Section 10.4.4.1 notes that accessibility to Elm Park Golf and Sports Club would be improved as a result of reduced traffic.

Section 10.4.4.2.1 of Chapter 10 (Economic Assessment, Commercial Amenity) notes that the Elm Park Golf and Sports Club is expected to experience a Negative, Moderate / Significant and Short – Term visual impact due to its location on Nutley Lane.

iii. Traffic Safety at both the Main Entrance and the Service Entrance

The entrance to the golf club have been designed to allow safe passage for pedestrians, cyclists and vehicles. An independent Stage 1 Road Safety Audit was carried out on the Proposed Scheme by PMCE and is included in Appendix M to the Preliminary Design Report. This audit did not envisage any safety issues with either the main entrance or the secondary entrance to Elm Park Golf and Sports Club. A Stage 2 Road Safety Audit will be carried out also, as part of the detailed design process, should the Proposed Scheme receive planning permission.

Section 5.1 of Chapter 5 (Construction) of the EIAR describes the construction phasing and programme as well as the construction activities necessary to undertake the works. Section 5.8 presents the temporary traffic management measures, including the staging measures to be carried out (i.e. how vehicles, cyclists and pedestrians will be impacted and safely catered for, during the works). The construction traffic management measures have been developed in accordance with the Traffic Signs Manual. Construction traffic management measures are included in the Construction Traffic Management Plan (CTMP) in Appendix A5.1 CEMP in Volume 4 of the EIAR.

Table 5.2 of the CEMP summaries the Construction Phase mitigation outlined in the relevant EIAR assessment chapter. Mitigation number LV5 states:

'Where properties are subject to permanent and / or temporary acquisition (especially Blackrock Park, Blackrock Clinic, Blackrock College, Nos. 85, 151 to 157 and Elm Court apartments, properties on Merrion Road, Elm Park Golf and Sports Club and St. Vincent's University Hospital) appropriate measures will be put in place by the appointed contractor to provide protection of features, trees and vegetation to be retained, for continued access during construction, and for adequate security and screening of construction works.

All temporary acquisition areas will be fully decommissioned and reinstated at the end of the Construction Phase or at the earliest time after the reinstatement works are completed to the satisfaction of the NTA.'

iv. Loss of Mature Trees along Elm Park Golf and Sports Club side of Nutley Lane

Chapter 3 of the EIAR (Consideration of Reasonable Alternatives) outlines the extensive options assessment exercise which has been undertaken to determine the Preferred Route Option for each section of the Proposed Scheme, including Nutley Lane. In relation to Nutley Lane, from a review of submissions received as part of the first round of non-statutory public consultation for this route, as well as a review of the topographical survey carried out subsequent to the route's publication, a number of issues were identified. The proposed removal of on-street trees and those in front gardens was a significant cause for concern amongst residents. These issues primarily relate to the section of Nutley Lane between the St. Vincent's University Hospital entrance / Nutley Avenue and the Elm Park Golf and Sports Club entrance due to the number of residential properties fronting onto the north-western side of the road, including a number which were proposed to be subject to land acquisition, and the number of on-street trees.

The Emerging Preferred Route (EPR) Option on Nutley Lane consisted of the two general traffic lanes, two bus lanes, two cycle tracks and two footpaths, from the R138 Stillorgan Road junction to the R118 Merrion Road junction. In order to achieve this, the EPR Option design indicated a loss of existing trees and parking along the length of Nutley Lane, as well as potential land take on both sides of the road (including a number of front gardens on the north-west side immediately adjacent to Nutley Avenue).

The proposed road alignment was revised to retain the existing kerb line on the residential side, and as such, retain the existing on-street trees along this footpath, and remove the requirement for land acquisition and tree removal in private residential properties on that side of Nutley Lane.

Chapter 17, Landscape (Townscape) & Visual of the EIAR has considered the potential landscape and visual impacts associated with the Construction and Operational Phases of the Belfield / Blackrock to City Centre Core Bus Corridor Scheme.

Table 17.7 classifies the significance and quality of Townscape /Streetscape /Visual Effects / Effects of the proposed changes to the Townscape and Streetscape Character of Nutley Lane during the Construction Phase to be Negative, Significant / Very Significant and Temporary / Short-Term.

Table 17.10 classifies the significance and quality of Townscape /Streetscape /Visual Effects / Effects of the proposed changes to the Townscape and Streetscape Character of Nutley Lane during the Operational Phase to be Negative, Moderate and Short-Term at 1 year post-construction changing to Negative, Slight / Moderate and Long-Terms at 15 years post-construction. A new hedgerow is proposed on the golf course side of the reinstated boundary to mitigate the loss of the existing hedge and trees in this location.

These impacts have been considered and balanced with the significantly enhanced level of service for public transport and for pedestrian / cycle connectivity along this section of the Proposed Scheme in line with the objectives of the Proposed Scheme.

- v. Impacts on temporary works zones and disturbance during works especially but not restricted to access and security

Section 5.1 of Chapter 05, Construction of the EIAR describes the construction phasing and programme as well as the construction activities necessary to undertake the works. Section 5.8 presents the temporary traffic management measures, including the staging measures to be carried out (i.e. how vehicles, cyclists and pedestrians will be impacted and safely catered for, during the works)..The construction traffic management measures have been developed in accordance with the Traffic Signs Manual. Construction traffic management measures are included in the Construction Traffic Management Plan (CTMP) in Appendix A5.1 CEMP in Volume 4 of the EIAR.

Table 5.2 of the CEMP summaries the Construction Phase mitigation outlined in the relevant EIAR assessment chapter. Mitigation number LV5 states: 'Where properties are subject to

permanent and / or temporary acquisition (especially Blackrock Park, Blackrock Clinic, Blackrock College, Nos. 85, 151 to 157 and Elm court apartments, properties on Merrion Road, Elm Park Golf and Sports Club and St. Vincent's Hospital) appropriate measures will be put in place by the appointed contractor to provide protection of features, trees and vegetation to be retained, for continued access during construction, for adequate security and screening of construction works. All temporary acquisition areas will be full decommissioned and reinstated at the end of the Construction Phase or at the earliest time after the reinstatement works are completed to the satisfaction of the NTA. It is noted that the proposed boundary wall has been designed to minimise the impact on the Golf and Sports Club.

vi. Reduced Cross-Section along Elm Park Golf and Sports Club

Chapter 3 of the EIAR (Consideration of Reasonable Alternatives), outlines the extensive options assessment exercise which has been undertaken to determine the Preferred Route Option for each section of the Proposed Scheme, including Nutley Lane.

In relation to Nutley Lane, from a review of submissions received as part of the first round of non-statutory public consultation for this route, as well as a review of the topographical survey carried out subsequent to the route's publication, a number of issues were identified. The proposed removal of on-street trees and those in front gardens was a significant cause for concern amongst residents.

These issues primarily relate to the section of Nutley Lane between the St. Vincent's University Hospital entrance / Nutley Avenue and the Elm Park Golf and Sports Club entrance due to the number of residential properties fronting onto the north-western side of the road, including a number which were proposed to be subject to land acquisition, and the number of on-street trees.

The Emerging Preferred Route (EPR) Option on Nutley Lane consisted of the two general traffic lanes, two bus lanes, two cycle tracks and two footpaths, from the R138 Stillorgan Road junction to the R118 Merrion Road junction. In order to achieve this, the EPR Option design indicated a loss of existing trees and parking along the length of Nutley Lane, as well as potential land take on both sides of the road (including a number of front gardens on the north-west side immediately adjacent to Nutley Avenue).

The proposed road alignment was revised to retain the existing kerb line on the residential side, and as such, retaining the existing on-street trees along this footpath, and remove the requirement for land acquisition and tree removal in private residential properties on that side of Nutley Lane.

Section 3.4.1.1.5 of Chapter 3 of the EIAR describes the seven options assessed for Nutley Lane including three lane options along Elm Park Golf and Sports Club. The Preferred Route Option was identified as Option NL2, comprising two bus lanes and two traffic lanes along the majority of Nutley Lane, as well as a two-way cycle track. While other options did perform well under many criteria, the expected impacts in relation to Transport Quality & Reliability and Traffic Network Integration were considerably more than in the preferred option.

A number of the options developed consisted of a three-lane cross section between Nutley Road and St. Vincent's University Hospital, namely options NL4, NL5 and NL7. Each of these options had specific reasons as to why they were not preferred. All three of these options performed poorly under traffic network integration compared to Option NL2 due to detours required for through traffic as a result of the one-way system in option NL4 and the potential queuing and delays as a result of the signal-controlled priority measures in options NL5 and NL7. Each of the three-lane options also performed worse than Option NL2 in terms of Road Safety due to additional interactions required between buses and general traffic. Options NL5 and NL7 performed worse than option NL2 in terms of transport quality and reliability due to a lack of physical bus priority and sharing road space with general traffic.

3.2.10 CPO10 - Elmpark Green Development

Description of the Proposed Scheme at this location

In order to achieve the Proposed Scheme objectives along this section of the corridor on the R118 Merrion Road, it is proposed to provide a footpath, bus lane and general traffic lane in each direction. An inbound bus lane is provided on the western side of Merrion Road and a two-way cycle track on the eastern side.

The existing road cross section in this location provides a footpath on each side of the road with one general traffic lane and a bus lane outbound and two general traffic lanes inbound.

In order to achieve the desired design for the Proposed Scheme, permanent land acquisition is required from a number of properties in this area including Elmpark Green.

The land take required is shown in the following:

- The relevant extract of the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description Figures, as per Figure 3.44 below;
- The existing aerial views in Figure 3.45; and
- The existing street view in Figure 3.46.



Figure 3.44: Proposed new Layout at Elmpark Green Merrion Road



Figure 3.45: Existing aerial view at Elmpark Green Merrion Road (Image Source: Google)



Figure 3.46: Existing Street View at Elmpark Green Merrion Road (Image Source: Google)

Summary of Objections Raised

This objection raised three potential issues as follows:

- i. CPO of Elmpark Green lands

The submission queries the need for permanent CPO and whether the proposed works can be facilitated by a temporary acquisition. It is requested that the permanent acquisition be limited to the back of the footpath with the landscaped areas returned to Elmpark Green development upon completion of the works.

The submission states the proposal to permanently acquire the areas to be landscaped could lead to a disjoint in both appearance and maintenance of landscaping owing to the fact that one would be maintained by the landowner and one by the NTA/Local Authority. It is requested that a condition is included to require agreement of the landscaping design at the entrance with Elmpark Green development prior to construction.

ii. Impact on junction operation

The submission states that from a review of the traffic modelling outputs, there are concerns regarding the impact of the proposed works on the operation of the Elmpark Green Junction and associated impacts on accessibility to the development.

iii. Access during Construction

The submission requests that in the event of a grant of permission, a condition is included to ensure the measures outlined in the Construction Environmental Plan are enforced in full. It is also requested that necessary access is maintained for the Elmpark Green Development.

Response to Objection Raised

i. CPO of Elmpark Green lands

The proposed scheme has been designed to deliver upon the scheme objectives set out in Chapter 1 of the EIAR. In some areas, CPO is required to deliver what has been determined to be the most appropriate design configuration that meets these objectives. The decision to acquire land in these locations has not been taken lightly and all areas included in the CPO have been carefully considered and only included where deemed absolutely necessary to meet the scheme objectives and construct the scheme for permanent and temporary acquisitions respectively.

The submission queries the need for permanent CPO along the access road to the Elmpark Green development and the proposed landscaping areas, suggesting that the proposed works could be undertaken under a temporary CPO acquisition. It is noted that permanent CPO has been identified in this location to facilitate parts of the proposed works which will require ongoing maintenance by the NTA/Local Authority. At this location this includes traffic signal infrastructure (induction loops), proposed SUDS i.e. swales, raingardens, filter drain identified on the northern side of the access road, public lighting columns (within the landscaped area on the southern side of the junction). While it is acknowledged that access for maintenance could be facilitated by agreement, the proposed CPO ensures that access for maintenance is always available.

In relation to the landscaped areas, these have been designed so as to be sympathetic to the existing landscaping areas being retained beyond the line of permanent CPO. If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage their agent / valuer in preparing, negotiating, and advising on compensation. 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 in line with any formal agreements and in accordance with any embedded mitigations identified in the EIAR or conditions/modifications from An Bord Pleanála in relation to the Proposed Scheme application. With respect to queries regarding maintenance of the landscape areas, this can be discussed during this stage of the process.

ii. Impact on junction operation

As set out in the EIAR Volume 2 - Main Chapters, Diagram 6.1 and Diagram 6.3 of Chapter 6 Traffic & Transport, people movement is a key design philosophy that underpins the objectives of the Proposed Scheme. People Movement is the concept of the optimisation of roadway space and / or the prioritisation of the movement of people over the movement of vehicles along the route and through the junctions along the Proposed Scheme. The aim being the reduction of journey times for higher person carrying capacity modes (bus, walking and cycling), which in turn provides significant efficiencies and benefits to users of the

transport network and the environment. As such, a multifaceted approach has been undertaken to assess the people movement throughout the Proposed Scheme.

Given the proposed amendments to the pedestrian, cycling, bus and parking / loading infrastructure, the Proposed Scheme will have greater capacity to facilitate movement of people travelling along the corridor. A quantitative impact assessment has been undertaken using outputs from the NTA's ERM and LAM, comparing the Do Minimum and Do Something peak hour scenarios for each forecast year (2028, 2043). The results of the assessment demonstrate that there will be an increase in the number of people travelling along the corridor by sustainable modes of 86% and 105% during the 2028 AM and PM Peak respectively.

During the 2043 scenario there will be an increase of 113% and 107% in the number of people travelling along the Proposed Scheme by sustainable modes during the AM and PM Peak Hours respectively. The analysis also shows that there will be an increase of 11.3% and 12.3% of bus boarders during the 2028 AM and PM Peak Hours respectively. During the 2043 scenario there will be an increase of 16% and 18% in bus boarders during the AM and PM Peak Hours respectively. Overall, it is anticipated that the increases to the total number of people travelling through the Proposed Scheme will have a High Positive impact.

To give an overview of how the Proposed Scheme will impact on bus journey times along the corridor, outputs for the B3 service, which traverses the largest extent of the Proposed Scheme (Sections 1-4), have been extracted from the model and are presented in chapter 6.4.6.2.5.2 which states that the Proposed Scheme will deliver average inbound journey time service bus passengers of up to 6.6 minutes (20 %) in 2028 (AM) and 5.2 minutes (16 %) in 2043. Furthermore, results presented in Diagram 6.15 suggest an improvement in bus journey time reliability. Based on the AM and PM peak hours alone, this equates to 8.2 hours of savings in 2028 and 7.6 hours in 2043, when compared to the Do Minimum combined across all buses. On an annual basis this equates to approximately 6,200 hours of bus vehicle savings in 2028 and 5,700 hours in 2043, when considering weekday peak periods only. Journey time variation and reliability are shown to improve in all Do Something scenarios compared to the Do Minimum. Overall, it is anticipated that the improvements to the network performance indicators for bus users along the Proposed Scheme will have a High Positive impact.

In addition to quantitative assessment summarised above, a qualitative assessment of the improvements to pedestrian and cycle facilities at each junction has been undertaken. As can be seen in table 6.29 of Chapter 6, the proposed improvements at the Elmpark Green junction would increase from LoS D to LoS A indicating a positive moderate effect at this location. Similarly, an assessment of the cycling infrastructure, which is assessed on a sectional basis, shows that the level of service for cyclists along the section between Booterstown Avenue and Nutley Lane would increase from LoS C to LoS B.

It is acknowledged that the junction assessment presented in Junction Design Report contained in Appendix A6.3 of the EIAR shows the junction to be operating above what is considered to be acceptable limits. However, it should be noted that this is only experienced in the AM peak period with only the southern Merrion Road approach operating above capacity with all other approaches, including the access to Elmpark Green, operating within capacity during both the morning and evening peak periods. Considering the significant benefits to people movement and in particular the movement of sustainable modes noted above, the operation of this junction for general traffic is considered to be acceptable.

With regard to the statement regarding the assessment not presenting the true impact of the Proposed Scheme, it is highlighted that that a comprehensive traffic assessment has been carried out using a variety of modelling software packages as summarised in Diagram 6.3 of Chapter 6 Traffic & Transport of the EIAR. Further detail on the transport model development process, the traffic data inputs used, the calibration, validation and forecast model development for the suite of transport models can be found in the Transport Modelling Report,

in Appendix A6.2 (Transport Modelling Report) and Appendix A6.3 (Junction Design Report) of Volume 4 of the EIAR. The assessment and results presented in the EIAR represent a full and true reflection of the impacts of the Proposed Scheme.

iii. Access during Construction

The submission notes specific concerns around access to Elmpark Green during construction. It is acknowledged that during the construction of the works there will be inconveniences for all users but this will be managed to minimise impacts for all affected parties. The duration of the works will vary from property to property, but access and egress will be maintained at all times.

As described in paragraph 5.5.3.2 of Chapter 5 Construction of Volume 2 of the EIAR, details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area. When roads and streets are being upgraded, there will be some temporary disruption / alterations to on-street and off-street parking provision, and access to premises in certain locations along the Proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times. This proposal is applicable to Elmpark Green.

As noted in section 6.5.1 of Chapter 6 of the EIAR, a detailed Construction Traffic Management Plan will be prepared, and subsequently implemented, by the appointed contractor prior to construction, including Temporary Traffic Management arrangements prepared in accordance with Department of Transport's 'Traffic Signs Manual, Chapter 8 Temporary Traffic Measures and Signs for Roadworks'. The CTMP will be consulted upon with the road authority and will include measures to minimise the impacts associated with the Construction Phase upon the peak periods of the day. It will include imbedded mitigation measures which will assist to alleviate any negative impact as a result of the Construction Phase of the Proposed Scheme. The appointed contractor will also prepare a Construction Stage Mobility Management Plan (CSMMP) which will be developed prior to construction, as described in the CEMP.

3.2.11 CPO11 - Farrell Caroline

Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor, it is proposed to provide a footpath, cycle track and bus lane/general traffic lane in each direction. A bus gate is also provided in front of the subject property.

The existing road cross section in this location provides a footpath on each side of the road with two general traffic lanes inbound and a single traffic lane outbound. An on-street loading bay is also provided on the outbound side of the carriageway

In order to achieve the desired design for the Proposed Scheme in this area, temporary land acquisition is from 1-11 Pembroke Road. This acquisition is required in order to undertake boundary works necessary to facilitate the bus gate. The land take required is shown in the following:

- The relevant extract of the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description Figures, as per Figure 3.47 below;
- the existing aerial views in Figure 3.48, and
- the existing street view in Figure 3.49.

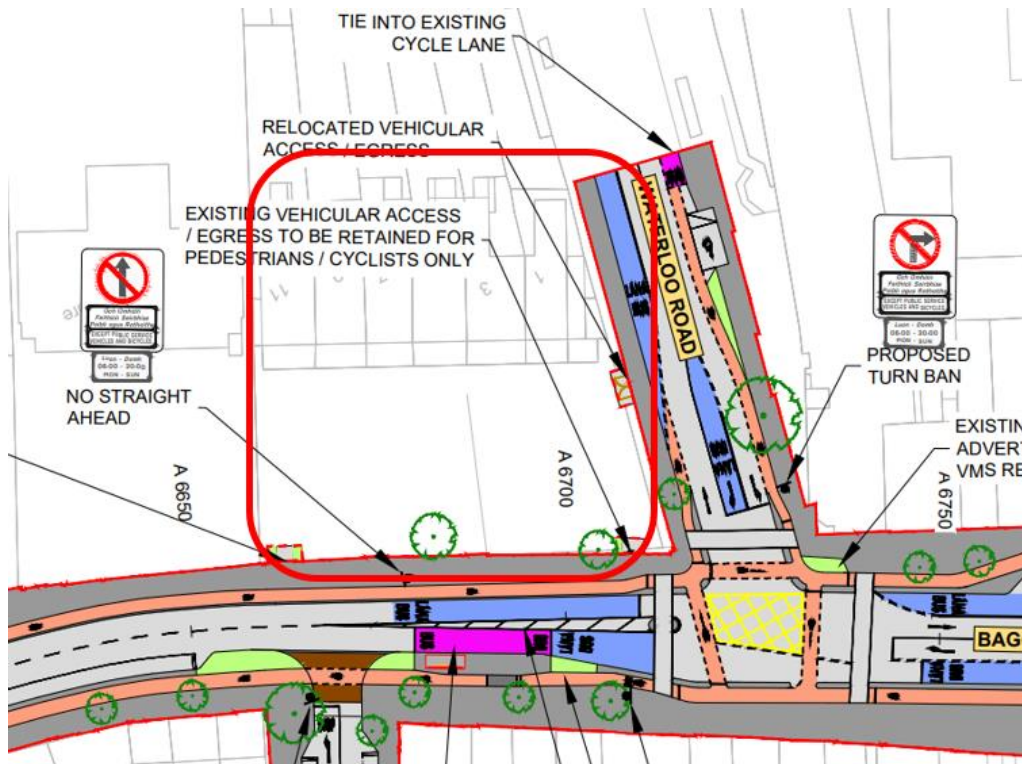


Figure 3.47: Proposed new Layout at 1-11 Pembroke Road



Figure 3.48: Existing aerial view at 1-11 Pembroke Road (Image Source: Google)

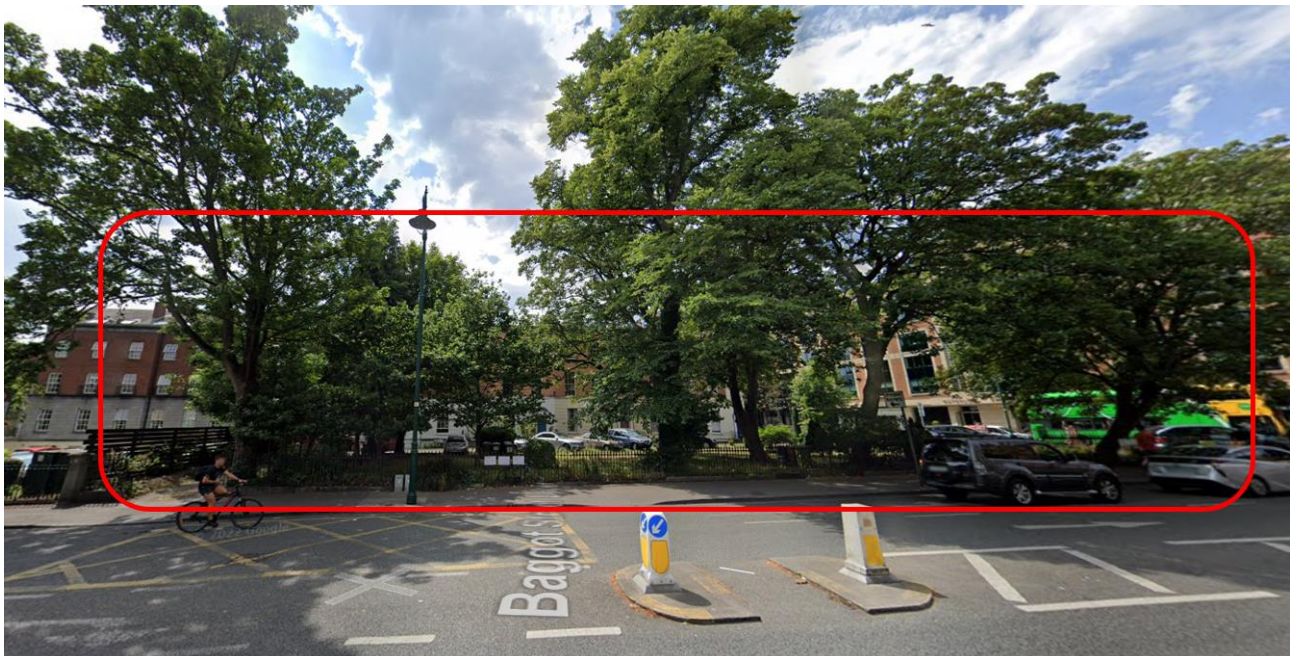


Figure 3.49: Existing Street View at 1-11 Pembroke Road (Image Source: Google)

Summary of Objection

- i. Support for other submissions

This submission notes support for submissions made by the Pembroke Road Association, Upper Baggot Street Traders Association and the Newton Plan

ii. Impact on access/egress of property

The submission notes objection to anything that will interfere with the current access/egress of the property

Response to Objection Raised

i. Support for other submissions

Detailed responses to the issues raised by this submission have been provided in Section 2.2.3 of this report.

ii. Impact on access/egress of property

As noted in Section 4.5.4.1.2 of Chapter 4 of the EIAR, a single bus gate is proposed on Pembroke Road, between the Eastmoreland Place and Waterloo Road junctions. This bus gate will ensure that public transport is prioritised on this section of the Proposed Scheme and that the only traffic utilising Pembroke Road (during the hours of operation of the bus gate) will be local traffic with a destination on or close to Pembroke Road, as well as through buses and authorised vehicles. The introduction of the proposed bus gate removes the need for four traffic lanes including dedicated bus lanes along this section of Pembroke Road resulting in a cross-section of a general traffic lane in each direction and a cycle track in each direction, i.e. inbound and outbound buses will use the two general traffic lanes. This reduced quantum of lanes along Pembroke Road avoids any permanent land take which means that all boundary treatments on Pembroke Road (including those of a historical / heritage value) remain unaffected, existing trees will be retained, and some on-street parking will also be retained. The existing footpath width along this section of the Proposed Scheme will also be retained and/or widened where practicable.

In order to facilitate the proposed bus gate, it will be necessary to amend access arrangements for 1-11 Pembroke Road. This is required as one of the existing access points to the property (the westernmost access) will be located within the area identified for the proposed bus gate. In addition, given the proximity of the existing access to the junction and also considering the improvement measures that the junction will undergo as part of the proposed protected junction design (as detailed in Appendix A4.1 BusConnects Preliminary Design Guidance Booklet (PDGB) of the EIAR), retaining vehicular movements at this access on the corner of the junction would require a compromise on the protected junction design approach and result in a poorer arrangement for pedestrians, cyclists and buses. As there was an alternative access solution achievable within such close proximity off Waterloo Road, it was therefore decided that on balance, the access on the corner of the junction should be restricted to pedestrian / cycle access only. As noted in section 5.5.5.1 of Chapter 5 of the EIAR, the existing vehicular access / egress will not be altered and the entrance road along the eastern boundary of the site will remain as it is presently. These details were agreed following on-site discussions with residents of 1-11 Pembroke Road and avoids impact on the internal garden and driveway layout. A new bollard will be installed in the centre of the existing access / egress to prevent vehicles from using the access / egress.

To mitigate the closure of this access to vehicular traffic, a new vehicular access is proposed on Waterloo Road approximately 20m from the Waterloo Road/Baggot Street junction where there is currently a pedestrian gate.

A new vehicular gate will replace the pedestrian gate and is proposed to facilitate continued vehicular access for residents at 1-11 Pembroke Road from all directions, that would otherwise be restricted during the hours of operation of the proposed bus gate. At the location of the new access / egress on Waterloo Road, the stone plinth will be removed on either side of the existing pedestrian gate and the existing railing will be amended to facilitate the new

vehicular access / egress. It is noted that the proposals include provision of a new control system at each of the vehicular access points on both Waterloo Road (adjacent to No. 1 Pembroke Road) and on Pembroke Road (at No. 11 Pembroke Road). These measures are proposed to mitigate the risk of through traffic from using the 1-11 Pembroke Road driveways to bypass the proposed bus gate.

3.2.12 CPO 12 - Freeman Veronica

Description of the Proposed Scheme at this location

In order to achieve the Proposed Scheme objectives along this section of the corridor on the R118 Merrion Road, it is proposed to provide a footpath, cycle track, bus lane and general traffic lane in each direction.

The existing road cross section in this location provides a footpath on each side of the road with one general traffic lane and a bus lane in each direction.

In order to achieve the desired design for the Proposed Scheme, permanent and temporary land acquisition is proposed from a number of properties in this area including 153 Merrion Road. The land take required is shown in the following:

The relevant extract of the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description Figures, as per

- Figure 3.50 below;
- The existing aerial views in Figure 3.51 and
- The existing street view in Figure 3.52.

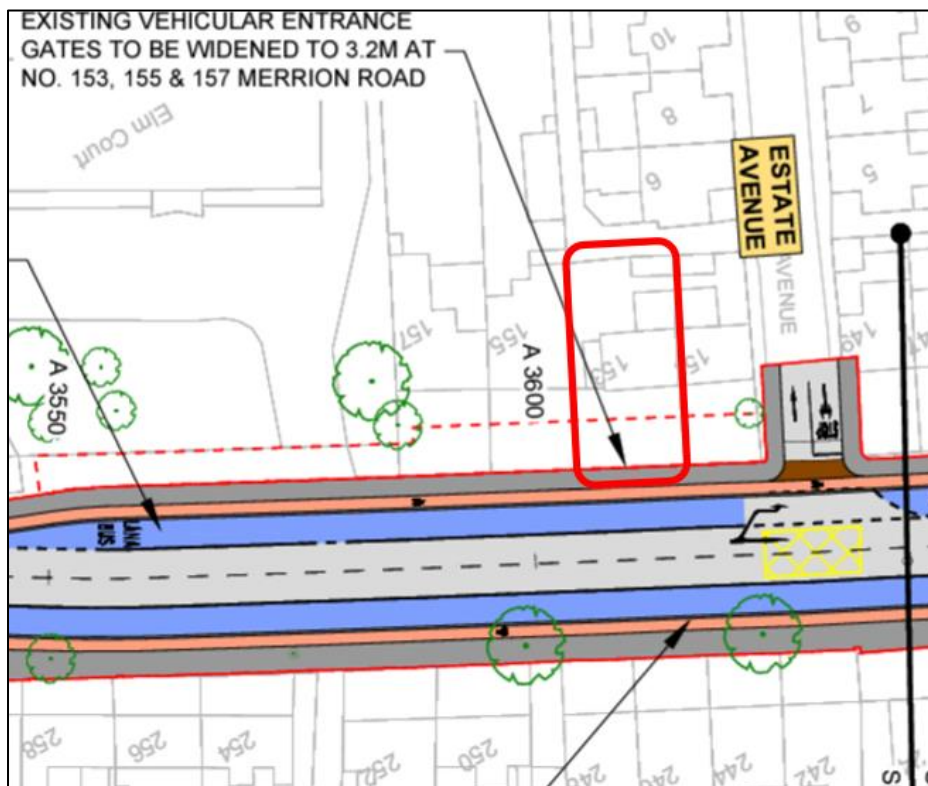


Figure 3.50: Proposed new Layout at 153 Merrion Road



Figure 3.51: Existing aerial view at 153 Merrion Road (Image Source: Google)



Figure 3.52: Existing Street View at 153 Merrion Road (Image Source: Google)

Summary of Objection Raised

This objection raised five potential issues as follows:

i. Enjoyment and Amenity of Home

The submission states that the proposed works will have a significant impact on the enjoyment of their home for the following reasons.

- It is suggested that the proposals have the potential to remove two car parking spaces within the curtilage of the property;
- The removal of hedging from the front of garden will increase pollution and noise levels within their home;
- The removal of historical railing and hedging will open up the view to the property impacting on the current level of privacy enjoyed;

- Reducing in market value of property due to loss of parking and garden space.
- ii. Cultural Heritage

The submission states that the property is listed under Dublin City Council's record of protected structures and that the proposal to reset the wall and railing will have a significant impact on the listed building.
 - iii. Removal of Street Trees.

The submission states that the removal of street trees from outside the property and vegetation within the garden will impact on the property.
 - iv. Environmental Impact Assessment.

The submission states that a detailed Environmental Impact Assessment should be carried out to identify the scale of potential impact.
 - v. Provision of Bus Priority Measures.

The submission suggests that the proposed signal-controlled priority from the Merrion Gates junction could be extended past no.157 Merrion Road, thus eliminating the impact on properties in this area.

Response to Objections Raised

i. Enjoyment and Amenity of Home

The proposed permanent acquisition will result in the loss of between 0.6m to 0.8m at the roadside of the front garden, with an additional 5.0m temporarily required to allow for the construction of boundary treatment works and tying into the existing garden/driveway. Upon completion of the permanent works, the temporary land take area will be handed back to the property owner. The edge of the proposed carriageway (bus lane) will be 0.3m to 0.4m (approximately 1 foot) closer to the residence than the kerb of the existing general traffic lane.

The 10.6m long front boundary wall will be at least 8.2m from the front of the house. This will not hinder the parking of two cars within the driveway, or materially reduce the number of cars that can be parked there.

EIAR Chapter 7 Air Quality provides details of the air quality assessment undertaken for the Proposed Scheme. For this section of the corridor this has been assessed as Negligible to Moderate Beneficial as shown in Figures 7.3 – 7.8 of Chapter 7 Air Quality of Volume 3 of the EIAR.

Section 9.4.4 of EIAR Chapter 9 Noise and Vibration assesses the impact of the operational phase of the Proposed Scheme on noise levels. As set out in Section 9.4.4 of EIAR Chapter 9 Noise and Vibration assesses the impact of the operational phase of the Proposed Scheme on noise levels. As set out in Section 9.4.4.1.1.5 the calculated impact in 2028 varies from a direct, positive, imperceptible to slight, short to medium term impact, to a negative, not significant, short to medium term impact (Reference to Table 9.18). This is as a result of reduction in overall traffic volumes through the incorporation of bus priority signals and junctions, restricted turning movements for private vehicles and the incorporation of dedicated bus lanes, cycle lanes and footpaths.

Section 9.4.4.2 of EIAR Chapter 9 Noise and Vibration considers the operational vibration impact of the Proposed Scheme. Analysis of traffic data for the Proposed Scheme indicates a reduction in overall AADT traffic flows along the core bus corridor. Reference to the monitoring results in Table 9.26 and Table 9.27 of Chapter 9 of the EIAR confirms that vibration levels associated with passing buses and other vehicular traffic at distances of 2.5 to 10m from the road edge are negligible in terms of human perception and building response. Vibration levels associated with a passing bus were recorded at 0.1mm/s PPV or less under

the monitored scenarios. These values are below the normal range of perceptible human response to vibration and would not pose any significant impact.

In respect of loss of privacy, if the CPO is confirmed by An Bord Pleanála, 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 in line with any formal agreements and in accordance with any embedded mitigations identified in the EIA or conditions /modifications from An Bord Pleanála in relation to the Proposed Scheme application. It is noted that throughout the project there have been several communications (letters, emails, telephone calls and site visits) with Ms Freeman with regard to the proposals at 153 Merrion Road.

The objection raises concerns about the loss of property value due to the loss of car parking and garden space.

EIA Chapter 10 Population includes Appendix A10.2 Economic Impact of the Core Bus Corridors. Section 3 on page 14 of the appendix discusses the impact of the Proposed Scheme on property prices. The conclusion reached is 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.

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage its agent / valuer in preparing, negotiating, and advising on compensation.

ii. Cultural Heritage

Appendix A16.2 Inventory of Architectural Heritage Sites in Volume 4 of the EIA outlines the locations of the Protected Structures along the Proposed Scheme which includes the referenced RPS 5091 to 5088 houses at 147 - 153 Merrion Road. The impact of the proposed works at this location is set out in section 16.4.3.1. This section notes that the existing boundary consists of wrought and cast-iron railings in cut granite plinths with wrought and cast-iron gates and are Protected Structures and are to be repositioned to facilitate a land take which will accommodate a bus and cycle lane. The buildings are of Regional Importance and Medium Sensitivity. The Magnitude of the impact is Medium. The potential Construction Phase impact is Direct, Negative, Moderate and Permanent.

However, mitigation is proposed as described in section 16.5.1.1 of the EIA where it states that the mitigation is for recording the existing boundaries in position prior to the commencement of construction works. The affected masonry, brickwork, railings, gates, gate posts, capping stones are to be labelled prior to their careful removal to safe storage, and their reinstatement on new lines, reinstating the existing details, and the relationships between the entrances and the historic buildings. Recording is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor. The architectural heritage specialist will oversee the labelling, taking-down and reinstatement of the affected gates (which will be widened for safety reasons), the railings, piers, bricks and masonry. Works to historic fabric will be carried out in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIA. With mitigation, the impact magnitude is reduced from Medium to Low. The predicted residual impact is Direct, Negative, Slight and Temporary.

iii. Removal of Street Trees

Immediately in front of the subject property at 153 Merrion Road, there are no existing trees and therefore no proposals for removal. Two trees immediately adjacent the property (outside

nos. 151 and 155 Merrion Road) are proposed to be removed to facilitate the proposed cross-section. It is noted that the scheme in this area has been specifically designed so as to retain as many trees as possible.

This is outlined in Table 4.9 of Chapter 4, where it states that approximately 300m of narrowed cycle track is provided on both sides of the Merrion Road in this area. Providing a standard width would require the demolition of adjacent private properties, result in the loss of a further number of trees, and require additional land acquisition, further impacting a number of adjacent private properties. In some cases, this would result in existing driveways becoming unusable, therefore, the minimisation of lane widths as part of the Proposed Scheme in this area reduces the residual impact in this area.

EIAR Volume 4 Part 2 Chapter 17 provides the Arboricultural Impact Assessment Report, which includes detailed drawings showing all trees that are to be removed. As summarised in Table 4 of that report, a total of 329 trees will be removed to facilitate the scheme. However, as stated in section 17.4.4.2.9 of Chapter 17, there will be substantial replanting of trees as part of the Proposed Scheme. As stated in section 12.5.1.2.1 of Chapter 5, 349 street trees will be planted throughout the scheme resulting in a net increase of 20 trees.

iv. Environmental Impact Assessment

A full and comprehensive Environmental Impact Assessment Report has been prepared to fully assess and present the impacts of the Proposed Scheme. As per the cover letter accompanying the CPO notice issued to all parties listed in the CPO, the Environmental Impact Assessment Report, Natura Impact Statement and CPO documentation can be found at the National Transport Authority website for the Belfield / Blackrock to City Centre Core Bus Corridor Scheme at www.belfieldblackrockscheme.ie. This is reiterated in the notice itself. Furthermore, as set out in item 10 of the CPO notice, the EIAR and accompanying documentation was available for inspection at both the NTA and An Bord Pleanála offices between 17th May 2022 and 12th July 2022.

v. Provision of Bus Priority Measures

The submission suggests that the proposed signal-controlled priority from the junction of R118 Merrion Road and Strand Road (Merrion Gates junction) could be extended past no.157 Merrion Road thus eliminating the impact on properties in this area.

As noted in section 4.5.2.1 of Chapter 4 of the EIAR, between the Merrion Gates junction and Elm Court, it is proposed to provide a three-lane carriageway along this section with a footpath and cycle track in both directions. The carriageway will comprise two general traffic lanes (one in each direction) and one outbound bus lane. Priority for inbound buses will be provided via signal-controlled priority at the Merrion Gates junction which will control the use of the shared inbound traffic lane between the Merrion Gates junction and Elm Court.

As stated in section 3.4.4.4 of Chapter 3 of the EIAR, the issue which required consideration was the bus lane on the Merrion Road inbound, immediately after the Merrion Gates junction. The Emerging Preferred Route proposed a full cross-section at this location, which would require land acquisition from 7 residential properties, the full demolition of another property and land acquisition from a commercial property over a section of 100m. Three of these properties possess very limited front gardens of approximately 2.5m depth, which the Emerging Preferred Route would effectively remove, resulting in these properties front doors being accessed directly from the new footpath. Additionally, nos. 165 and 167 Merrion Road have short driveways of c. 4.5m which would have been materially impacted by the previously proposed land take such that it would not have been possible to provide parking in front of these properties. An alternative option was considered to investigate if the impacts of the Emerging Preferred Route could be lessened while achieving the core objectives of the Proposed Scheme. The following design options were assessed:

- **EPR Option.** This option is the option as described above whereby fully segregated bus lanes and cycle tracks, together with footpaths and general traffic lanes are provided in both directions. This option ensures full priority for inbound buses; and
- **Alternative Option.** This option delays the re-introduction of the inbound bus lane on Merrion Road for approximately 100m after the Merrion Gates junction. Buses approaching the Merrion Gates junction inbound, will have a bus priority signal to stop inbound general traffic and permit inbound buses to join the shared general traffic lane between the Merrion Gates junction and Elm Court. Traffic signal operation would be configured to keep the general traffic lane clear of stationary traffic to prevent delay to buses in the shared section. This option removed the need for land acquisition and full demolition of property, permits fully segregated cycle facilities and permits some on-street parking to be retained.

While fully segregated bus lanes will be omitted over a 100m section of the Proposed Scheme, due to its location at a signalised junction on the route and the short length of shared lane, it will be possible to provide bus priority through this section without increased delay to buses. Given that the Alternative Option can still provide bus priority it is preferred when compared to the EPR Option which would result in land acquisition and property demolition. The Alternative Option has therefore been included in the final Preferred Route Option.

It is noted that the starting point of the bus lane in the inbound direction is located immediately after the aforementioned constraint at no. 165 Merrion Road so as to maximise the amount of physical priority afforded to buses and limit the potential for queuing traffic approaching the SVUH junction (in the inbound direction) to extend beyond the available physical bus lane. This proposal provides c. 170m of physical bus priority in advance of the SVUH junction with a length of c. 110m controlled by signal-controlled priority. Extending the area of signal-control priority and reducing the length of dedicated bus lane to remove land take from nos 151 to 157 Merrion Road, would reduce the physical bus lane in this area to only 85m in advance of the SVUH junction and increase the signal-controlled priority length to almost 200m. It is considered that significantly reducing the available queuing space for vehicles on approach to the SVUH junction would introduce an unacceptable risk to the progress of buses through this area and as such this is not considered to be an option that meets the scheme objectives.

3.2.13 CPO 13 - Gas Networks Ireland

Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor, it is proposed to provide a footpath, bus lane and general traffic lane in each direction.

The existing road cross section in this location provides a footpath on each side of the road with one general traffic lane and a bus lane in each direction.

In order to achieve the desired design for the Proposed Scheme, permanent and temporary land acquisition is from a number of properties in this area including the St. Vincent's Above Ground Installation (AGI). The land take required is shown in the following:

- The relevant extract of the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description Figures, as per Figure 3.53 below;
- The existing aerial views in Figure 3.54 and
- The existing street view in Figure 3.55.

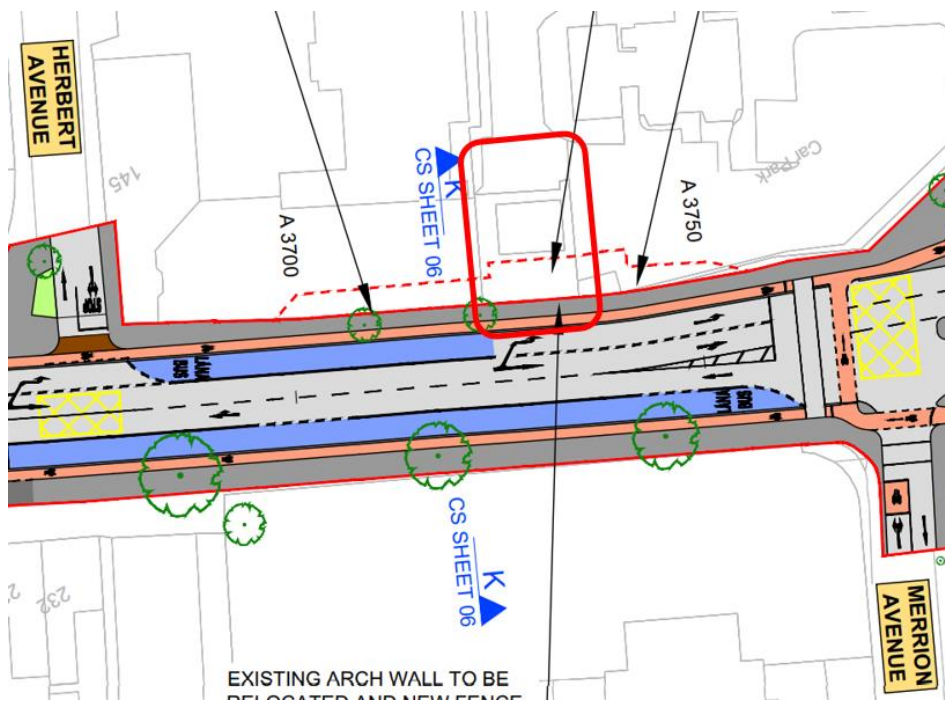


Figure 3.53: Proposed new Layout at St. Vincent's AGI



Figure 3.54: Existing aerial view at St. Vincent's AGI (Image Source: Google)



Figure 3.55: Existing Street View at St. Vincent's AGI (Image Source: Google)

Summary of Objection Raised

This objection raised three potential issues as follows:

i. Request for meeting with NTA

The submission states that GNI have contacted the NTA with a request to meet the safety team and engineers to discuss the proposal and options to avoid works at the AGI.

ii. Impact on operations during construction

The submission states that decommissioning this installation for an extended period during construction will severely impact the gas supply to the hospital and the surrounding area, leading to loss of supply for a large number of customers that includes vulnerable members of the public. Therefore, the proposed temporary land take is a serious concern for GNI.

The submission states that the AGI is a Transmission Installation and GNI requires safe access to this AGI at all times in order to maintain a safe and secure gas network.

iii. AGI unsuitable for access by non-GNI operatives

The submission states that there is an isolation valve on the inlet of the 19 bar transmission connection in the parking area which has a Zone 1 hazardous area associated with it. This would make the area unsuitable for access by non-GNI operatives, due to the potential presence of an explosive atmosphere.

Response to Objections Raised

i. Request for meeting with NTA

The submission notes that GNI had contacted the NTA to discuss the proposals and options to avoid works at the AGI. It is noted that that on the day this submission was sent to ABP in June 2022, the NTA met with representatives from GNI to discuss the proposals. During this meeting, it was highlighted that a number of meetings were held with GNI representatives prior to this to discuss the proposals at St. Vincent's AGI, including meetings in February 2021, April 2021 and June 2021. During the meeting in June 2022, the items previously

discussed with GNI were presented by NTA and a brief history of engagement with GNI was shared.

The previous meetings with GNI, held in 2021 were also supplemented with several emails explaining and clarifying proposals. These meetings discussed several difficulties to the setting back of the existing boundary, raised by GNI, arising from difficulties currently experienced at the AGI due to the very narrow stone arch along the frontage. GNI informed NTA of the difficulties experienced in access and egress for GNI staff in vehicles. Design proposals were developed by NTA to alleviate existing challenges and to allay safety concerns. This culminated in a design which relocated the existing archway away from the boundary of the AGI, permitting a significantly wider, roller type gate and security fencing to be installed. The new access gate would also be located in a position away from the existing isolation valve, meaning AGI staff could fully drive into the facility without parking over the hazardous zone, as is currently the case.

During these meetings, while no acceptance of the CPO was confirmed and GNI indicated a preference that the boundary not be required to be set-back, GNI acknowledged their understanding that the proposals would improve access and visibility to the AGI, improving safety for GNI staff while also improving access to the emergency isolation valve for GNI staff.

Additionally, GNI advised NTA that further engagement with GNI in relation to all services potentially impacted by the Proposed Scheme will be required during the detailed design and construction of the Proposed Scheme, however no specific requirements with regards to access to the area during construction were stated. NTA agreed to continue to engage with GNI during the further development of the scheme.

ii. Impact on operations during construction

As set out in section 5.5.4.2.1.3 Chapter 5 of the EIAR, the existing cut stone masonry archway located outside the St. Vincent's AGI, will be carefully dismantled and re-erected in an adjacent area along the northern boundary of St. Vincent's University Hospital. A new gateway and boundary treatment will be constructed at the St. Vincent's AGI location. As can be seen EIAR Chapter 4 Proposed Scheme Description Appendix GNI Alteration drawings, there are no works planned to any of the GNI infrastructure in this area. It is therefore not anticipated that these works will result in a need to decommission the AGI for any period of time.

Chapter 19 of the EIAR assesses the potential impact of construction works on major infrastructure and utilities. Section 19.5.1.1 states that the Proposed Scheme has been designed to minimise the impact on major infrastructure. This includes the avoidance of interactions with major utility infrastructure as far as possible, including at the St. Vincent's AGI. It is noted in Table 4.9 of Chapter 4 of the EIAR that approximately 300m of narrowed cycle track (1.5m) is provided on both sides of the Merrion Road in this area. Providing the desirable cross section would also result in a significant impact to the operation of the existing GNI above ground installation, among other things, and as such a decision was made to reduce cycle track widths locally.

In terms of the temporary land acquisition area, the space identified is required to facilitate the careful removal of the existing cut stone masonry archway, construction of the new wall and access gate and reinstatement works. For clarity, the entire area identified for temporary acquisition will not be required for the duration of the works. It is acknowledged that during the construction of the works there will be inconveniences for all users but this will be managed to minimise impacts for all affected parties. The duration of the works will vary from property to property, but access and egress will be maintained at all times, including access to the live AGI to facilitate any works necessary. As described in paragraph 5.5.3.2 of Chapter 5 Construction of Volume 2 of the EIAR, details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area.

During construction, all possible precautions will be taken by the appointed contractor to avoid unplanned interruptions to any services during the Construction Phase of the Proposed Scheme. This will include appropriate investigation by the appointed contractor to identify the precise location of all utility infrastructure within the working areas prior to the commencement of excavation works. Where works are required in and around known utility infrastructure, precautions will be implemented by the appointed contractor to protect the infrastructure from damage, in accordance with best practice methodologies and the requirements of the utility companies, where practicable. Protection measures during construction will include warning signs and markings indicating the location of utility infrastructure, safe digging techniques in the vicinity of known utilities, and in certain circumstances where possible, isolation of the section of infrastructure during works in the immediate vicinity.

iii. AGI unsuitable for access by non-GNI operatives

The submission states that the presence of an isolation valve on the inlet of the 19 bar transmission connection in the parking area which has a Zone 1 hazardous area associated with it make the area unsuitable for access by non-GNI operatives, due to the potential presence of an explosive atmosphere.

As explained above, NTA are of the understanding that the proposed scheme will result in an improved work space for GNI staff, through the replacement of the access gate to the AGI. This will allow GNI staff to park within the AGI enclosure, without parking over the isolation valve or hazardous area associated with it.

Additionally, GNI advised NTA that further engagement with GNI in relation to all services potentially impacted by the Proposed Scheme will be required during the detailed design and construction of the Proposed Scheme, however no specific requirements with regards to access to the area during construction we stated. NTA agreed to continue to engage with GNI during the further development of the scheme.

It is anticipated that during the detailed design phase of the Proposed Scheme, further details and construction methodologies can and will be agreed with GNI, including any potential construction works supervision. It will also be a requirement that the appointed contractor will be sufficiently qualified, experienced and competent to carry out works in restricted areas, including hazardous zones associated with underground and overground utilities.

3.2.14 CPO 14 - Harrison Anthony

Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor, it is proposed to provide a footpath, cycle track and bus lane/general traffic lane in each direction. A bus gate is also provided in front of the subject property.

The existing road cross section in this location provides a footpath on each side of the road with two general traffic lanes inbound and a single traffic lane outbound. An on-street loading bay is also provided on the outbound side of the carriageway

In order to achieve the desired design for the Proposed Scheme in this area, temporary land acquisition is from 1-11 Pembroke Road. This acquisition is required in order to undertake boundary works necessary to facilitate the bus gate. The land take required is shown in the following:

- The relevant extract of the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description Figures, as per Figure 3.56 below;
- the existing aerial views in Figure 3.57, and
- the existing street view in Figure 3.58.

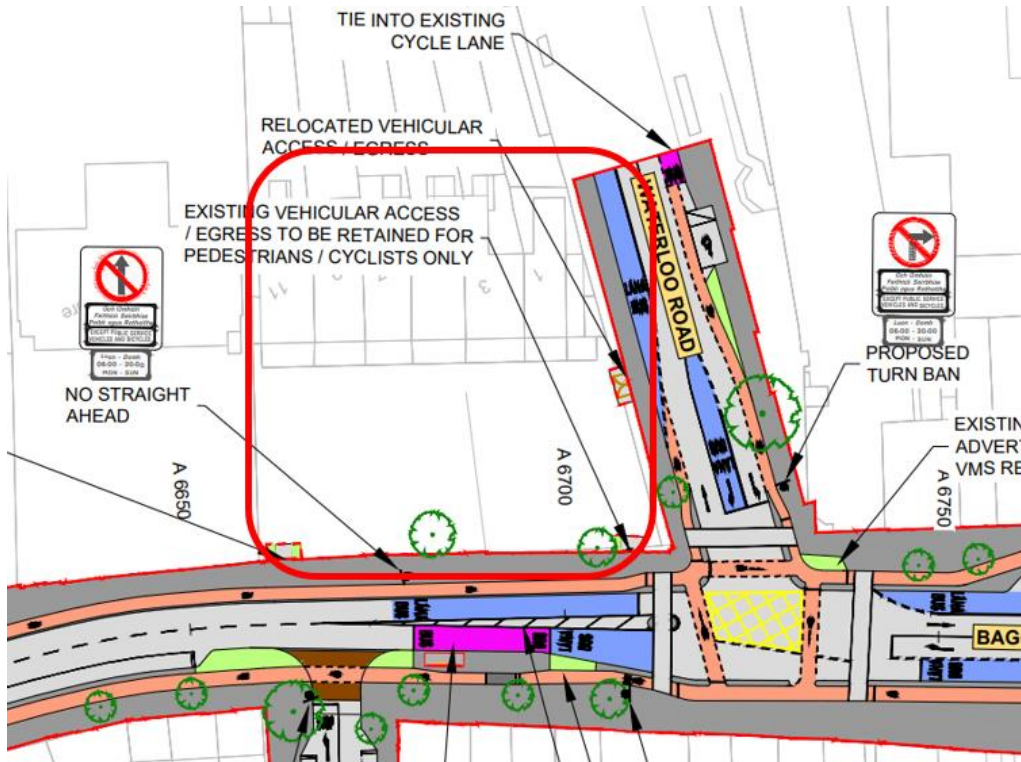


Figure 3.56: Proposed new Layout at 1-11 Pembroke Road



Figure 3.57: Existing aerial view at 1-11 Pembroke Road (Image Source: Google)

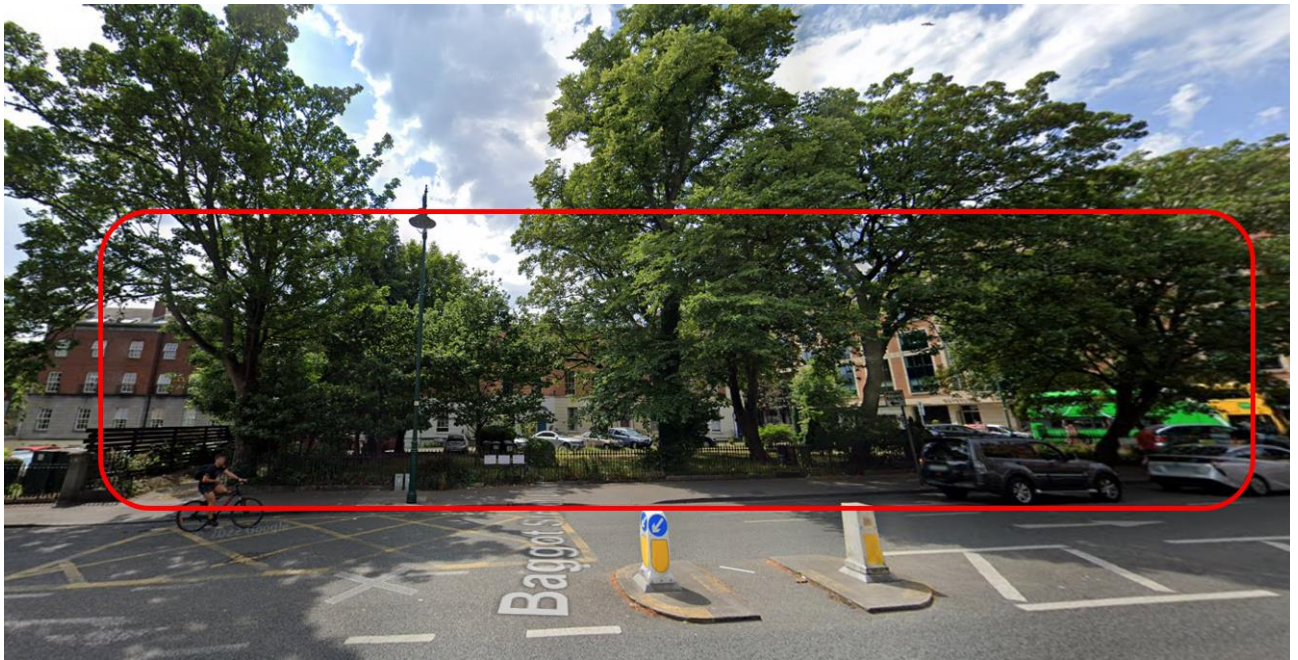


Figure 3.58: Existing Street View at 1-11 Pembroke Road (Image Source: Google)

Summary of Objection Raised

This objection raised two potential issues as follows:

i. Impact on access and safety

The submission states that the works would alter the access to the property. It notes that traffic from the access to be closed is intermittent and has proved safe for a long time. The proposed gate onto Waterloo Road could prove dangerous due to proximity to Baggot Street Upper.

ii. Impact on Heritage

The submission notes that the plinth and railings enclosing the gardens date from the year 1850 and that it is an area of conservation.

Response to Objections Raised

i. Impact on access and safety

As noted in Section 4.5.4.1.2 of Chapter 4 of the EIAR, a single bus gate is proposed on Pembroke Road, between the Eastmoreland Place and Waterloo Road junctions. This bus gate will ensure that public transport is prioritised on this section of the Proposed Scheme and that the only traffic utilising Pembroke Road (during the hours of operation of the bus gate) will be local traffic with a destination on or close to Pembroke Road, as well as through buses and authorised vehicles. The introduction of the proposed bus gate removes the need for four traffic lanes including dedicated bus lanes along this section of Pembroke Road resulting in a cross-section of a general traffic lane in each direction and a cycle track in each direction, i.e. inbound and outbound buses will use the two general traffic lanes. This reduced quantum of lanes along Pembroke Road avoids any permanent land take which means that all boundary treatments on Pembroke Road (including those of a historical / heritage value) remain unaffected, existing trees will be retained, and some on-street parking will also be retained.

The existing footpath width along this section of the Proposed Scheme will also be retained and/or widened where practicable.

In order to facilitate the proposed bus gate, it will be necessary to amend access arrangements for 1-11 Pembroke Road. This is required as one of the existing access points to the property (the westernmost access) will be located within the area identified for the proposed bus gate. In addition, given the proximity of the existing access to the junction and also considering the improvement measures that the junction will undergo as part of the proposed protected junction design (as detailed in Appendix A4.1 BusConnects Preliminary Design Guidance Booklet (PDGB) of the EIAR), retaining vehicular movements at this access on the corner of the junction would require a compromise on the protected junction design approach and result in a poorer arrangement for pedestrians, cyclists and buses. As there was an alternative access solution achievable within such close proximity off Waterloo Road, it was therefore decided that on balance, the access on the corner of the junction should be restricted to pedestrian / cycle access only. As noted in section 5.5.5.1 of Chapter 5 of the EIAR, the existing vehicular access / egress will not be altered and the entrance road along the eastern boundary of the site will remain as it is presently. These details were agreed following on-site discussions with residents of 1-11 Pembroke Road and avoids impact on the internal garden and driveway layout. A new bollard will be installed in the centre of the existing access / egress to prevent vehicles from using the access / egress.

To mitigate the closure of this access to vehicular traffic, a new vehicular access is proposed on Waterloo Road approximately 20m from the Waterloo Road/Baggot Street junction where there is currently a pedestrian gate.

A new vehicular gate will replace the pedestrian gate and is proposed to facilitate continued vehicular access for residents at 1-11 Pembroke Road from all directions, that would otherwise be restricted during the hours of operation of the proposed bus gate. At the location of the new access / egress on Waterloo Road, the stone plinth will be removed on either side of the existing pedestrian gate and the existing railing will be amended to facilitate the new vehicular access / egress. It is noted that the proposals include provision of a new control system at each of the vehicular access points on both Waterloo Road (adjacent to No. 1 Pembroke Road) and on Pembroke Road (at No. 11 Pembroke Road). These measures are proposed to mitigate the risk of through traffic from using the 1-11 Pembroke Road driveways to bypass the proposed bus gate.

In terms of safety, Safety Audits have been undertaken for the Proposed Scheme and are included as Appendix M of the Preliminary Design Report provided in the Supplementary Information. These audits did not highlight any safety concerns with the proposed arrangement.

ii. Impact on Heritage

EIAR Volume 2 Chapter 16, Architectural Heritage, documents the potential architectural heritage impacts associated with the Construction and Operational Phases of the Proposed Scheme. With regard to numbers 1-11 Pembroke Road, EIAR Volume 2 Chapter 16 notes the following:

“The alteration of the entrances to 1 Pembroke Road (DCC RPS 6552) will have an impact on the setting of numbers 1 to 11 Pembroke Road (DCC RPS 6552, 6554, 6556, 6558, 6560, 6562, odd numbers only) protected structures of Regional Importance and Medium Sensitivity, during the Operational Phase. The Magnitude of the impact is Low. The potential Operational Phase impact is Indirect, Negative, Slight and Long-term.” and

“Two further locations were identified where it is proposed that access, egress and gates to protected structures will be altered. These include the relocation of the vehicular entrance gate to the former Pembroke Town Hall (DCC RPS 5084) to Anglesea Road and relocation of the existing egress from 1 Pembroke Road (DCC RPS 6552) onto Waterloo Road. The existing gate will be retained as a pedestrian entrance. The pre-mitigation Construction Phase

impact is Negative, Moderate and Permanent. The mitigation is for recording and labelling the affected sections of the boundary treatments in detail prior to the commencement of construction works. The existence of a pedestrian gates in the location of the proposed vehicular entrances will help mitigate the loss of historic fabric as the existing gates will be adapted. The existing gates are to be taken down along with the end posts, sections of railing and plinths. The north end post to the pedestrian gate on Anglesea Road will be retained in position. Removed sections of historic fabric are to be stored safely for reuse. The southern end posts are to be reinstated in the widened entrances. The removed railings will be adapted to form gates to match the existing pedestrian gates. The existing and new gates will be reinstated. Historic fabric which is not directly affected by the proposed landscaping works or works to the gates, such as adjoining sections of railing, or other architectural heritage features will be protected during the course of works. The kerbs or edging to the flower beds will be recorded and labelled before being carefully removed by the appointed contractor and stored for reuse in the proposed landscaping. Recording is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor. The architectural heritage specialist will oversee the labelling, taking-down and reinstatement of the affected gates, railings, piers, bricks and masonry. Works to historic fabric will be carried out in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR. The resulting vehicular entrances with double leaf gates will retain much of the existing historic fabric and will be in keeping with the Protected structures and the adjoining streetscapes. The reinstatement of historic fabric will reduce the magnitude of impact from Medium to Low. The predicted residual impact is Direct, Negative, Slight and Long-term.”

As such, it is noted that the impact on this property will be slight and balancing this with the realisation of the stated aims and objectives of the Proposed Scheme, this impact is considered to be acceptable.

3.2.15 CPO 15 - Lamtos Unlimited Company – Merrion House

Description of the Proposed Scheme at this location

In order to achieve the Proposed Scheme objectives along this section of the corridor on the R118 Merrion Road, it is proposed to provide a footpath, bus lane and general traffic lane in each direction. An inbound bus lane is provided on the western side of Merrion Road and a two-way cycle track on the eastern side.

The existing road cross section in this location provides a footpath on each side of the road with one general traffic lane and a bus lane outbound and two general traffic lanes inbound.

In order to achieve the desired design for the Proposed Scheme, permanent and temporary land acquisition is from a number of properties in this area including Merrion House.

The land take required is shown in the following:

- The relevant extract of the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description Figures, as per Figure 3.59 below;
- the existing aerial views in Figure 3.60, and
- the existing street view in Figure 3.61.

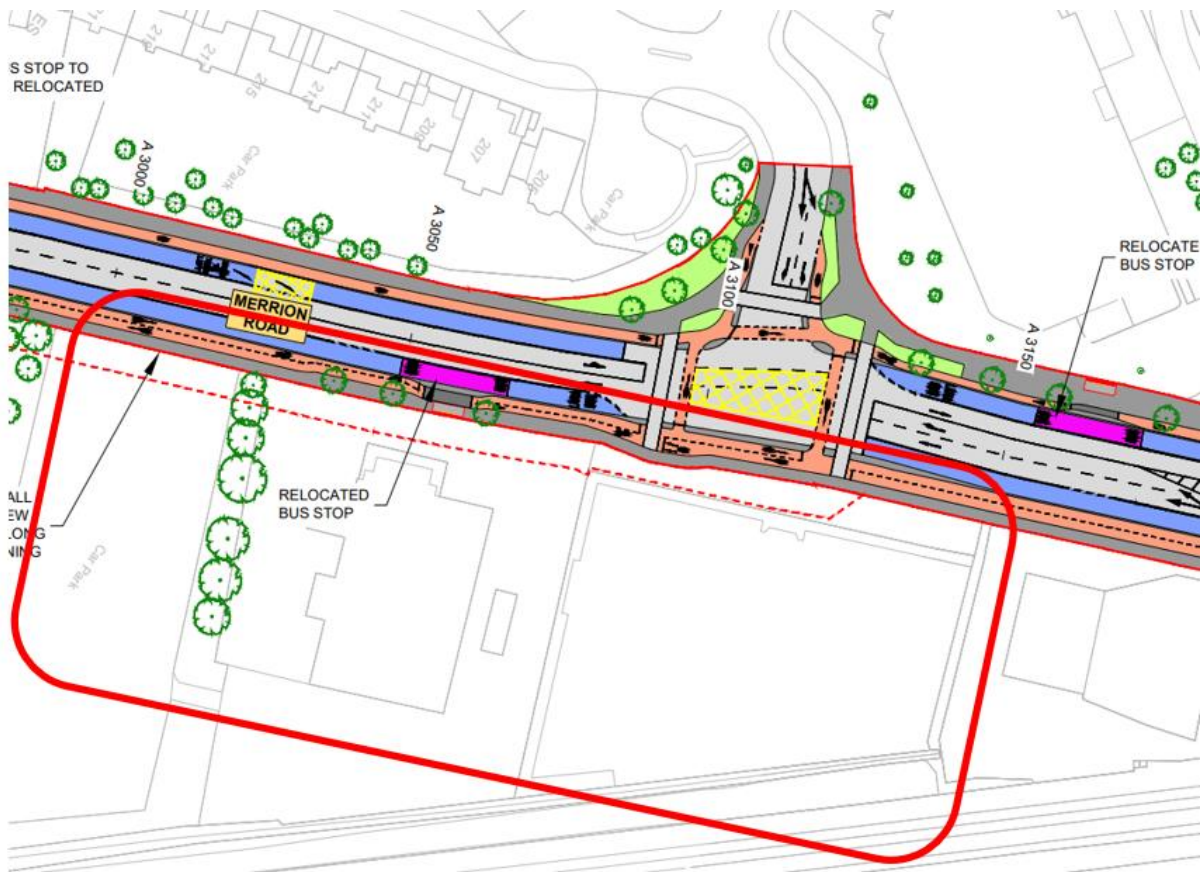


Figure 3.59: Proposed new Layout at Merrion House



Figure 3.60: Existing aerial view at Merrion House (Image Source: Google)



Figure 3.61: Existing Street View at Merrion House (Image Source: Google)

Summary of Objection Raised

This objection raised three potential issues as follows:

- i. Exclusion of site accesses from Proposed Scheme Drawings

The submissions states that the three vehicular access points to the site have not been shown on the General Arrangement drawings.

- ii. Extent of CPO and the need for two-way cycle track on eastern side of Merrion Road

The submission states that the two-way cycle track on the eastern side of Merrion Road and the northbound cycle track on the western side is an unnecessary duplication that would involve additional land take from the site. It is suggested that the two-way cycle track is reduced to one-way to reduce the extent of CPO required.

- iii. Location and arrangement of proposed bus stop

The submission states that Bus Stop 425 has been relocated to the location of the proposed future access to the development at this site and it is requested that it is moved such that it doesn't impact on that proposal.

It is further noted that the arrangement at the bus stop appears to drop bus passengers off onto the proposed cycle path which would lead to conflicts with cyclists and bus users. It is suggested that an island bus stop be provided to ensure safety for both bus users and cyclists.

Response to Objection Raised

- i. Exclusion of site accesses from Proposed Scheme Drawings

The three site access locations have not been omitted from the scheme drawings. While the location of these is not immediately apparent from the General Arrangement drawings, these are more clearly identified on the Fencing and Boundary Treatment Drawings in EIAR Volume 3 Chapter 4 Proposed Scheme Description Figures and as such have been considered in the design. See Figure 3.62 below for an extract from Sheet 09 of 23 of the Fencing and Boundary Treatment Drawings. The reason that they are not apparent from the on the General Arrangement Drawings is due to the manner in which these access points are proposed to be treated under the Proposed Scheme. Similar to the existing arrangement at

these access points where vehicles cross over the footpath to access the road, the proposed design allows for a similar arrangement albeit with vehicles now crossing over a footpath and a cycle track to access the road. This is similar to how all driveways or access to minor developments are treated across the scheme. This arrangement affords visual and physical priority to pedestrians and cyclists at these minor access locations.

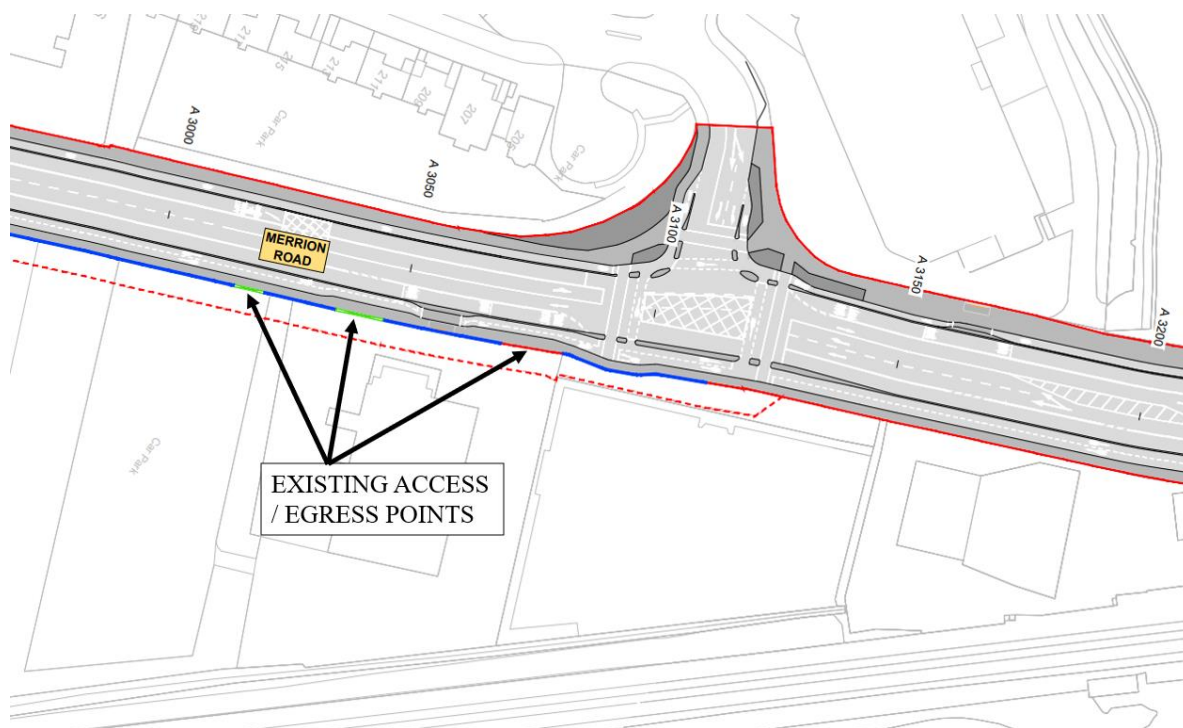


Figure 3.62: Extract from Fencing and Boundary Treatment Drawing

- ii. Extent of CPO and the need for two-way cycle track on eastern side of Merrion Road

As noted in section 1.2 of Chapter 1 of the EIAR, one of the primary objectives of the Proposed Scheme is to enhance the potential for cycling by providing safe infrastructure for cycling, segregated from general traffic wherever practicable.

A key part of meeting this objective is ensuring that the proposed scheme for cycling aligns with broader policy in relation to the development of a safe coherent cycle network in the city and Greater Dublin Area.

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

Extracts from the GDACNP are shown in Image 2.1 and Image 2.2 of Chapter 2 of the EIAR, which highlights the Proposed Scheme in the context of the planned cycle network. There are two primary cycle routes (Cycle Route 13 and Cycle Route 13A) identified running along the majority of the Proposed Scheme, as well as Secondary Cycle Routes on Nutley Lane (S04) and Fitzwilliam Street (C7). The Proposed Scheme also intersects with two other primary cycle routes, namely SO1 and SO3 (the Grand Canal Greenway and the Dodder Greenway respectively) as well as a number of secondary cycle routes (including Cycle Routes SO2, SO6, 13E). In addition, a proposed greenway (N5 East Coast Trail) is identified running parallel to a section of the corridor.

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

As noted in Section 4.6.6.3, the proposed scheme will integrate with the East Coast Trail. The East Coast Trail, GDACNP Corridor 5, runs along the East Coast from Rosslare through Dublin to the border with Northern Ireland and onward to Belfast and Larne. The Sutton to Sandycove (S2S) Greenway section of the East Coast Trail will interact with the Proposed Scheme between the Merrion Road / Strand Road junction and the Merrion Road / Booterstown DART Entrance junction. As a result, the Proposed Scheme includes a two-way cycle track on the coast side of Merrion Road between Strand Road and Booterstown DART Entrance to accommodate the S2S section of the East Coast Trail and avoids cyclists who are travelling on the greenway in either direction from having to cross the road to continue on the East Coast Trail as it interacts with the Proposed Scheme. The two-way cycle track also offers a connection opportunity to existing cycle facilities within and through Blackrock Park at the Booterstown Avenue junction.

Considering the dual function of this section of the route as part of both Primary Cycle Route 13 and Greenway Route N5, both of which serve different purposes, the proposed scheme was identified as the most appropriate option for cyclists that best meets the objectives of the scheme.

iii. Location and arrangement of proposed bus stop

As part of the development of the design of the Proposed Scheme a bus stop review was undertaken and is presented in the Preliminary Design Report Appendix H (Bus Stop Review Report), included in the Supplementary Information. The purpose of the process was to review the locations of the existing Dublin Bus stops and to determine whether a stop should be removed, relocated, or remain where it is. This exercise was carried out to optimise the performance of the bus services on the Proposed Scheme by reducing the journey time of the bus service, increasing the walking catchment of the bus stops and ensuring that key trip attractors located along the route are sufficiently covered within the catchment of bus stops.

As part of this exercise, it was proposed to relocate bus stop 425 c.125m north to be immediately adjacent to Merrion House and the Elmpark Green junction. As noted in Appendix B2 of the Preliminary Design Report Appendix H (Bus Stop Review), included in the Supplementary Information, *'this new location better serves Elmpark Green (which is a major catchment), and is located directly after a junction'* in line with the principles of bus stop location. This location is the optimal location for a bus stop in this area which best meets the objectives of the scheme.

In relation to the request to move the bus stop so as to avoid conflict with the proposed access to the redeveloped Merrion House site, the Proposed Scheme has been designed so as to respect the existing access arrangement to the site, i.e. the proposed bus stop is located between two existing vehicular access points. Extant permissions have also been considered in the development of the Proposed Scheme, however it is noted that the proposals at Merrion House are not yet submitted for planning and as such the proposed access arrangement has not been considered in the scheme design.

As set out in Section 11.1 of Appendix A4.1 Preliminary Design Guidance Booklet (PDGB) of EIAR Chapter 4 Proposed Scheme Description, an island bus stop is the preferred bus stop option where space constraints allow. However, as noted in Section 11.2 of the PDGB, in constrained locations, where insufficient width is available to provide an island bus stop, a shared landing area bus stop arrangement may be considered. This design avoids conflict between cyclists and stopping buses and a 1:20 ramp is provided on the cycle track to raise the cycle track to the level of the footpath/island area. On approach to the shared landing area bus stop, the cycle track is intentionally narrowed and yellow bar markings proposed also to promote a low-speed single file cycling arrangement on approach to the bus stop.

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.

At the proposed bus stop location, an island bus stop would result in additional land take, therefore, a shared bus stop landing zone has been adopted so as to minimise the extent of land take on Lamtos/ Merrion House lands.

3.2.16 CPO 16 - Long Helen

Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor, it is proposed to provide a footpath, cycle track and bus lane/general traffic lane in each direction.

The existing road cross section in this location provides a footpath, bus lane and general traffic lane in each direction. At the entrance to the Sion Hill complex a right turn lane is also provided.

In order to achieve the desired design for the Proposed Scheme in this area, temporary land acquisition is from Sion Hill. This acquisition is required in order to facilitate the bus gate a side road entry treatment and associated tie-in works.

The land take required is shown in the following:

- The relevant extract of the EIAR Volume 3 Chapter 4 Proposed Scheme Description Figures, General Arrangement drawings in Figure 3.63
- The existing aerial views in Figure 3.64 and
- The existing street view in Figure 3.65 below.



Figure 3.65: Existing Street View at Sion Hill Merrion Road (Image Source: Google)

Summary of Objections Raised

This objection raised three potential issues as follows:

i. Extent of CPO

The submission states that the CPO should be rejected on the basis that the location is a vital part of the Sion Hill apt complex to exit and enter the Sion Hill lands.

ii. Development on other Sion Hill lands not included in the CPO

The submission suggests that the proposed scheme is partially on other lands within the ownership of Sion Hill.

iii. Safety of proposals at entrance

The submission notes that the entry/exit to/from Sion Hill is already dangerous and the proposed scheme would make crossing more hazardous.

Response to Objection Raised

i. Extent of CPO

The Proposed Scheme includes a small portion of temporary land acquisition from the Sion Hill lands in order to facilitate the construction of a new raised entry treatment across the entry to the property. This is proposed in order to facilitate a safer environment for pedestrians and cyclists across the entrance and is provided in line with the guidance set out in Section 8.1 of Appendix A4.1 Preliminary Design Guidance Booklet.

The submission notes that the CPO should be rejected on the basis that the location is a vital part of the Sion Hill apt complex to exit and enter the Sion Hill lands.

For clarity, the Proposed Scheme will not impact on access to the Sion Hill complex and access is to be retained at the same location following completion of the works, with improvements as noted above to improve safety for vulnerable road users.

The proposed CPO will be temporary in nature with all lands returned to the owner following completion of the works. It is acknowledged that during the construction of the works there will be inconveniences for all users but this will be managed to minimise impacts for all affected parties. The duration of the works will vary from property to property, but access and egress will be maintained at all times. As described in paragraph 5.5.3.2 of Chapter 5 Construction of Volume 2 of the EIAR, details regarding temporary access provisions (if required) will be discussed with homes and businesses prior to construction starting in the area.

ii. Development on other Sion Hill lands not included in the CPO

The submission suggests that the Proposed Scheme includes land within the ownership of Sion Hill that has not been included in the CPO. While the specific area has not been identified in the submission, it is understood that this refers to the landscaped verge between the Sion Hill boundary wall and the back of the public footpath. Through the detailed land referencing exercise undertaken by the NTA, it is understood that this landscaped verge (which includes public infrastructure such as public lighting and ESB control boxes) is within the boundaries of the public road and as such has not been included in the CPO.

Based on the above we believe that all required private lands in this area have been included in the CPO.

iii. Safety of proposals at entrance

As noted in response to Item i, the proposals at the entrance to the Sion Hill complex facilitate the construction of a new raised entry treatment across the entry to the property. This is proposed in order to facilitate a safer environment for pedestrians and cyclists across the entrance including:

- Ramped entrance and reduced corner radii at entrance to Sion Hill to slow vehicles entering/exiting the property; and
- Continued priority for pedestrians and cyclists across the entrance without the need for either to ramp down to the level of the access road.

The proposal is provided in line with the guidance set out in Section 8.1 of Appendix A4.1 of the EIAR, Preliminary Design Guidance Booklet and is compliant with the principles Design Manual for Urban Roads and Streets.

It is noted that broadly speaking, the arrangement at the junction with the exception of the changes noted above, will remain similar with a dedicated right turn lane into the Sion Hill complex being provided as per the existing arrangement

In terms of safety, Safety Audits have been undertaken for the Proposed Scheme and are included as Appendix M of the Preliminary Design Report provided in the Supplementary Information. These audits did not highlight any safety issues with the proposed arrangement.

3.2.17 CPO 17 - Management Company 31 – 33 Merrion Road CLG

Description of the Proposed Scheme at this location

In order to achieve the Proposed Scheme objectives along this section of the corridor on the R118 Merrion Road, it is proposed to provide a footpath, cycle track, bus lane and general traffic lane in each direction.

The existing road cross section in this location provides a footpath on each side of the road with a bus lane and general traffic lane inbound, and a cycle lane and general traffic lane outbound.

In order to achieve desired design for the Proposed Scheme, temporary land acquisition is necessary from 31-33 Merrion Road. This is required to provide a raised table treatment across the junction as set out in Section 8.1 of Appendix A4.1 Preliminary Design Guidance Booklet.

The land take required is shown in the following:

- The relevant extract of the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description Figures, as per Figure 3.66 below;
- The existing aerial views in Figure 3.67, and
- The existing street view in Figure 3.68.

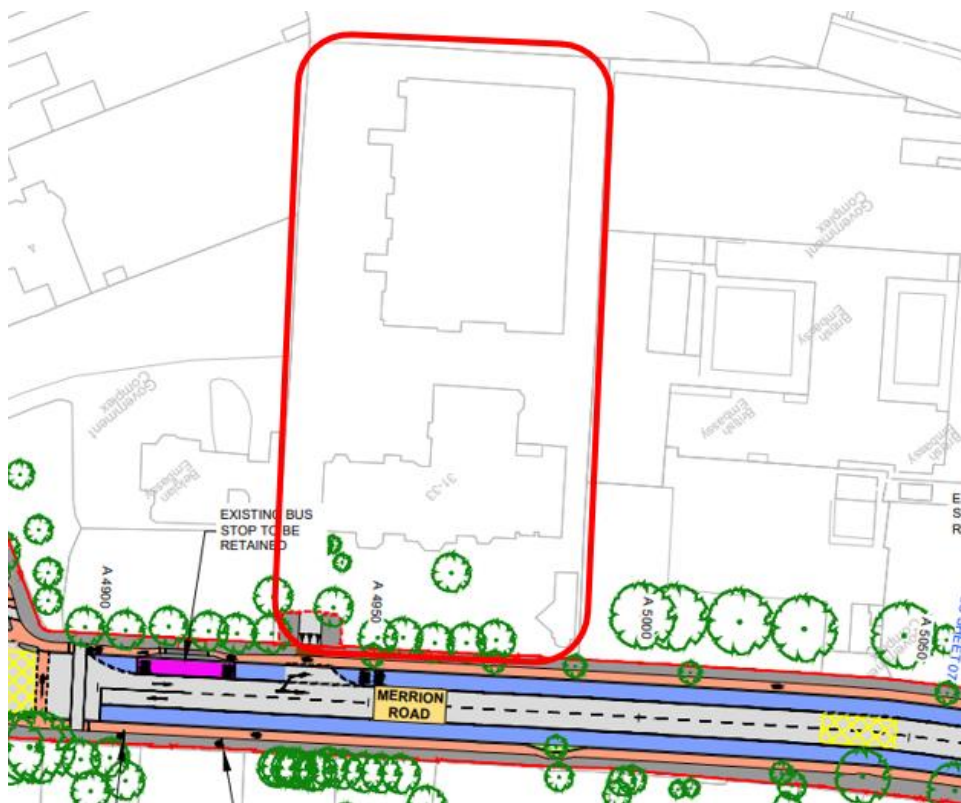


Figure 3.66: Proposed new Layout at 31-33 Merrion Road



Figure 3.67: Existing aerial view at 31-33 Merrion Road (Image Source: Google)

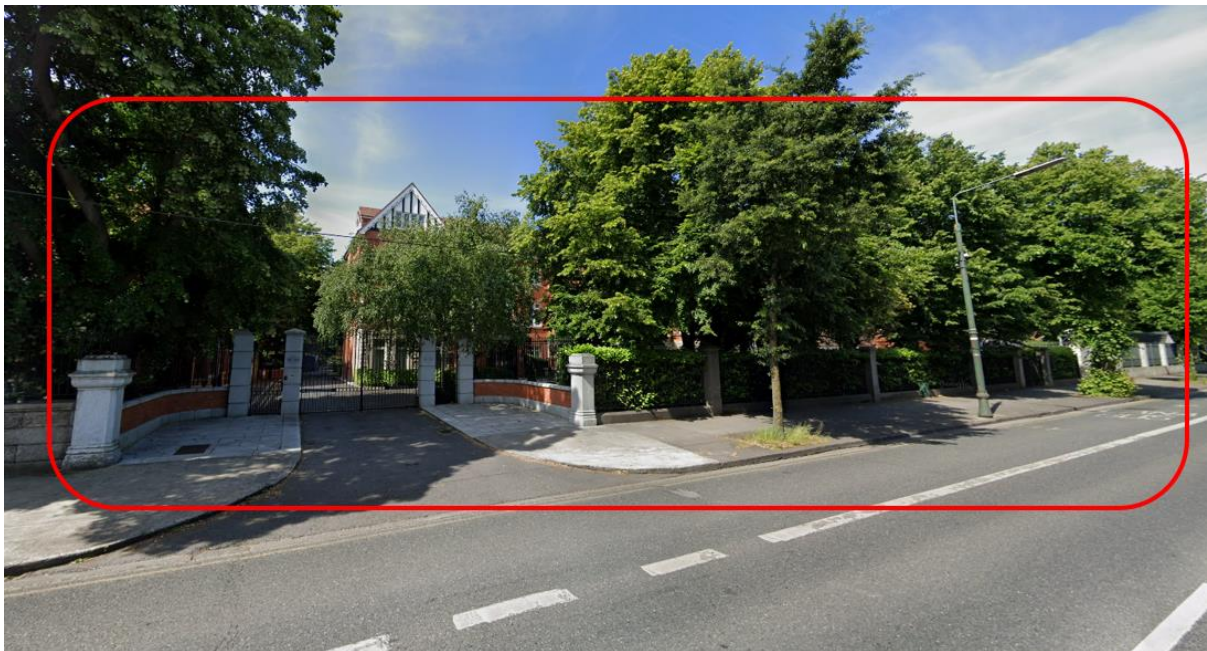


Figure 3.68: Existing Street View at 31-33 Merrion Road (Image Source: Google)

Summary of Objection

It is noted that this submission does not raise an objection to the CPO as proposed but does make two requests for conditions with any decision as follows:

- i. Condition that consultation takes place with Management Company 31-33 Merrion Rd CLG with regard to final materials, specifications used in works at the property.
- ii. Condition that consultation takes place with Management Company 31-33 Merrion Rd CLG with regard to maintenance of access arrangements during construction.

Response to Objection Raised

- i. Condition that consultation takes place with Management Company 31-33 Merrion Rd CLG with regard to final materials, specifications used in works at property.

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on the landowner whose land is being acquired. Following service of the Notice to Treat, the landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage its agent / valuer in preparing, negotiating, and advising on compensation. 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 in line with any formal agreements and in accordance with any embedded mitigations identified in the EIAR or conditions/modifications from An Bord Pleanála in relation to the Proposed Scheme application.

- ii. Condition that consultation with Management Company 31-33 Merrion Rd CLG with regard to maintenance of access arrangements during construction.

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

3.2.18 CPO 18 - McGivern Shauna

Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor on the R118 Merrion Road, it is proposed to provide a footpath, cycle track, bus lane and general traffic lane in each direction.

The existing road cross section in this location provides a footpath on each side of the road with one general traffic lane and a bus lane in the inbound direction and two general traffic lanes in the outbound direction.

In order to achieve the desired design for the Proposed Scheme, permanent and temporary land acquisition is proposed from a number of properties in this area including 155 Merrion Road.

The land take required is shown in the following:

- The relevant extract of the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description Figures, as per Figure 3.69 below;
- the existing aerial views in Figure 3.70, and
- the existing street view in Figure 3.71.

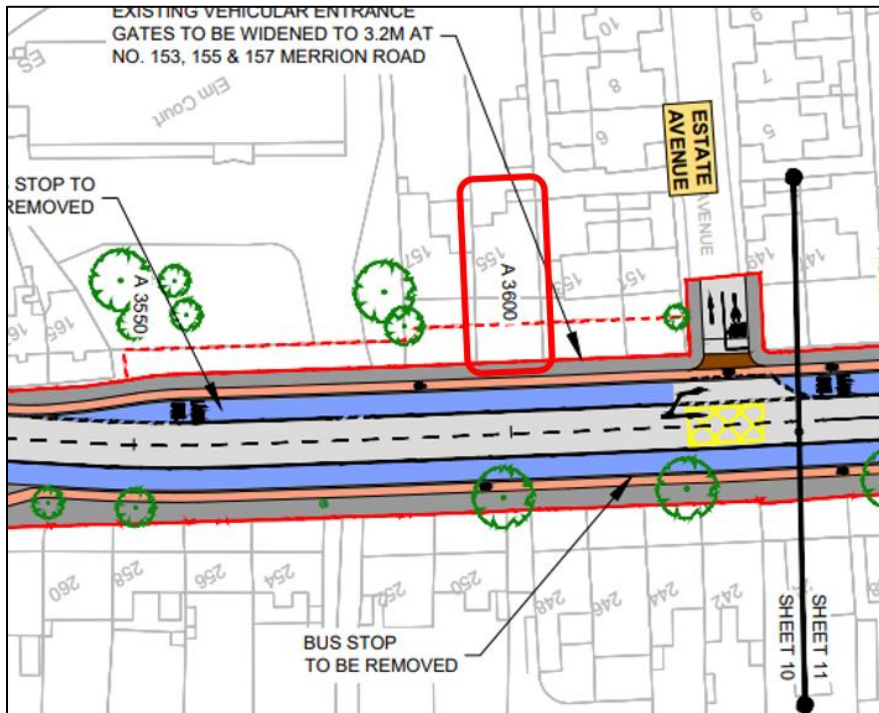


Figure 3.69: Proposed new Layout at 155 Merrion Road



Figure 3.70: Existing aerial view at 155 Merrion Road (Image Source: Google)



Figure 3.71: Existing Street View at 155 Merrion Road (Image Source: Google)

Summary of Objections Raised

This objection raised five potential issues as follows:

i. Extent of CPO and impact on property

The submission states that the proposed CPO would have a disproportionate effect on the property and result in an increased risk to the owners during both the construction and operation stages.

ii. Cultural Heritage

The submission states that the proposed CPO will result in the removal of period walls and railings from the property.

iii. Car Parking and Access

The submission states that it is unclear whether there will be space to park upon completion of the works. Furthermore, it states that there will be increased risk/hazard entering or exiting the property as there will be need to cross a far greater area to gain access to the road and the vehicles may need to block the cycle track or bus lane to enter/exit.

iv. Removal of Cycle Facilities as Alternative Route exists

The submission offers an opinion that the cycle facility along Sandymount Strand provides a reasonable alternative for cyclists traveling to/from the city and as such cycle facilities could be dropped by the proposed scheme along Merrion Road

v. Enjoyment and Amenity of Property

The submission states that the proposed scheme would constitute an infringement of the owners rights to the quiet enjoyment of their property.

Response to Objection Raised

i. Extent of CPO and impact on property

The permanent acquisition will result in the loss of between 0.7m to 0.8m with an additional 5.0m temporarily required to allow for the construction of boundary treatment works and tying into the existing garden/driveway. The edge of the proposed bus lane will be 0.4 to 0.5m closer to the residence than the kerb of the existing general traffic lane. The 9.0m long front boundary wall will be at least 6.2m from the steps at the front of the house. It is believed that this would not introduce any additional risk to the owners during the operation of the proposed scheme and that this will not hinder the ability to park in the driveway.

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

As noted in section 5.10.5 of Chapter 5 of the EIAR, the requirements of the Safety, Health and Welfare at Work Act 2005, the Safety, Health and Welfare at Work (Construction) Regulations, 2013 and other relevant Irish and EU safety legislation will be complied with at all times. As required by the Regulations, a Health and Safety Plan will be formulated which will address health and safety issues from the design stages through to the completion of the Construction Phase. This plan will ensure that all works are undertaken in a safe manner.

ii. Cultural Heritage

Appendix A16.2 Inventory of Architectural Heritage Sites in Volume 4 of the EIAR outlines the locations of the Protected Structures along the Proposed Scheme which includes the referenced RPS 542 and 542a houses at 155 - 157 Merrion Road. The impact of the proposed works at this location is set out in section 16.4.3.1. This section notes that the existing boundary consists of wrought and cast-iron railings in cut granite and red brick plinths with wrought and cast-iron gates terminating in red brick piers topped with granite capstones. The material contents of the existing boundary are to be repositioned to facilitate a land take which will accommodate a bus and cycle lane. The buildings are of Regional Importance and Medium Sensitivity. The Magnitude of the impact is Medium. The potential Construction Phase impact is Direct, Negative, Moderate and Permanent.

However, mitigation is proposed in section 16.5.1.1 of the EIAR where it states that the mitigation is for recording the existing boundaries in position prior to the commencement of construction works. The affected masonry, brickwork, railings, gates, gate posts, capping stones are to be labelled prior to their careful removal to safe storage, and their reinstatement on new lines, reinstating the existing details, and the relationships between the entrances and the historic buildings. Recording is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor. The architectural heritage specialist will oversee the labelling, taking-down and reinstatement of the affected gates (which will be widened for safety reasons), the railings, piers, bricks and masonry. Works to historic fabric will be carried out in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR. With mitigation, the impact magnitude is reduced from Medium to Low. The predicted residual impact is Direct, Negative, Slight and Temporary.

iii. Car Parking and Access

As noted in response to item i above, the permanent acquisition will result in the loss of between 0.7m to 0.8m with an additional 5.0m temporarily required to allow for the construction of boundary treatment and tying into the existing garden/driveway.

The 9.0m long front boundary wall will be at least 6.2m from the steps at the front of the house. It is believed that this should not hinder the ability to park in the driveway.

It is noted that there is an existing bus lane already in operation outside of 155 Merrion Road. This is retained in the Proposed Scheme and a new cycle track is proposed between the bus lane and the new footpath. The design allows for the safe use of the access as per Appendix A4.1 BusConnects Preliminary Design Guidance Booklet (PDGB) of the EIAR and the principle of how residents can access / egress their properties is unchanged by the Proposed Scheme. The Road Safety Audits undertaken for the Proposed Scheme, included as Appendix M of the Preliminary Design Report provided in the Supplementary Information, did not highlight any safety issues with the proposed access and parking arrangement in this regard.

Also, under S.I. No. 182/1997 Section 13 Driving on Footway, a vehicle is allowed to be driven across the footpath for the purpose of access to or egress from a place adjacent to the footpath, and in accordance with S.I. No. 182/1997 Section 14 Cycle Tracks, that a vehicle is also allowed to be driven across the cycletrack for the purpose of access to or egress from a place adjacent to a cycle track. It is not anticipated that entry / exit to / from the property will result in any prolonged blocking of the bus lane, cycle track or footpath.

iv. Removal of Cycle Facilities as Alternative Route exists

Section 2.2.1.3 of Chapter 2 of the EIAR summarises the Greater Dublin Area (GDA) Cycle Network Plan (hereafter referred to as the GDACNP) and the context of the proposed scheme within it. The EIAR states that the GDACNP (NTA 2013), was adopted by the NTA in early 2014 following a period of consultation with the public and various stakeholders. This plan forms the strategy for the implementation of a high quality, integrated cycle network as set out in the GDA Transport Strategy.

Extracts from the GDACNP are shown in Figure 3.72, which highlights the Proposed Scheme in the context of the planned cycle network. There are two primary cycle routes (Cycle Route 13 and Cycle Route 13A) identified running along the majority of the Proposed Scheme, as well as Secondary Cycle Routes on Nutley Lane (S04) and Fitzwilliam Street (C7). The Proposed Scheme also intersects with two other primary cycle routes, namely SO1 and SO3 (the Grand Canal Greenway and the Dodder Greenway respectively) as well as a number of secondary cycle routes (including Cycle Routes SO2, SO6, 13E). In addition, a proposed greenway (N5 East Coast Trail) is identified running parallel to a section of the corridor.



Figure 3.72: Extract from GDA Cycle Network Plan (proposed scheme highlighted in yellow for information)

The Proposed Scheme, which is supported by the GDACNP for the area, is needed to address the significant deficiency in the very limited segregated cycling infrastructure currently available on this corridor. As can be seen in Figure 3.72, the primary route for cyclists (route 13) is along the R118 Merrion Road and caters for cycle access to religious, educational and employment hubs in the Merrion Village area such as St. Vincent's University Hospital, Our Lady Queen of Peace Church, St. Michael's College, the Merrion Shopping Centre, Elm Park Golf and Sports Club and RTÉ, as well as residential developments in the Merrion Village area. As such, it is not considered that the Strand Road cycle route (secondary route 13E/N5) is a suitable alternative should it be implemented in a permanent state.

v. **Enjoyment and Amenity of Property**

The submission states that the proposed scheme would constitute an infringement of the owners' rights to the quiet enjoyment of their property.

As set out in Section 17.4.4.2.4 of Chapter 17 Landscape (Townscape) & Visual, the new boundary treatment will be reinstated on a like-for-like basis at a setback location. Overall, there would be a relatively small loss of private / garden area (approximately 0.7m – 0.8m) which will result in a partial loss of landscape amenity space, but there would be no notable change to the key characteristics of these properties.

Chapter 10 of the EIAR assesses the impact of permanent land take acquisition on community facilities and residential properties. Section 10.6.2 identifies that a Negative, Not significant and Long-Term land take impact is expected at 155 Merrion Road.

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on each landowner whose land is being acquired. Following service of the Notice to Treat, each landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage their own agent / valuer in preparing, negotiating, and advising on compensation.

3.2.19 CPO 19 - Quinn Laura

Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor on the R118 Merrion Road, it is proposed to provide a footpath, cycle track, bus lane and general traffic lane in each direction.

The existing road cross section in this location provides a footpath on each side of the road with one general traffic lane and a bus lane in the inbound direction and two general traffic lanes in the outbound direction.

In order to achieve the desired design for the Proposed Scheme, permanent and temporary land acquisition is proposed from a number of properties in this area including 157 Merrion Road.

The land take required is shown in the following:

- The relevant extract of the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description Figures, as per Figure 3.73 below;
- The existing aerial views in Figure 3.74, and
- The existing street view in Figure 3.75.

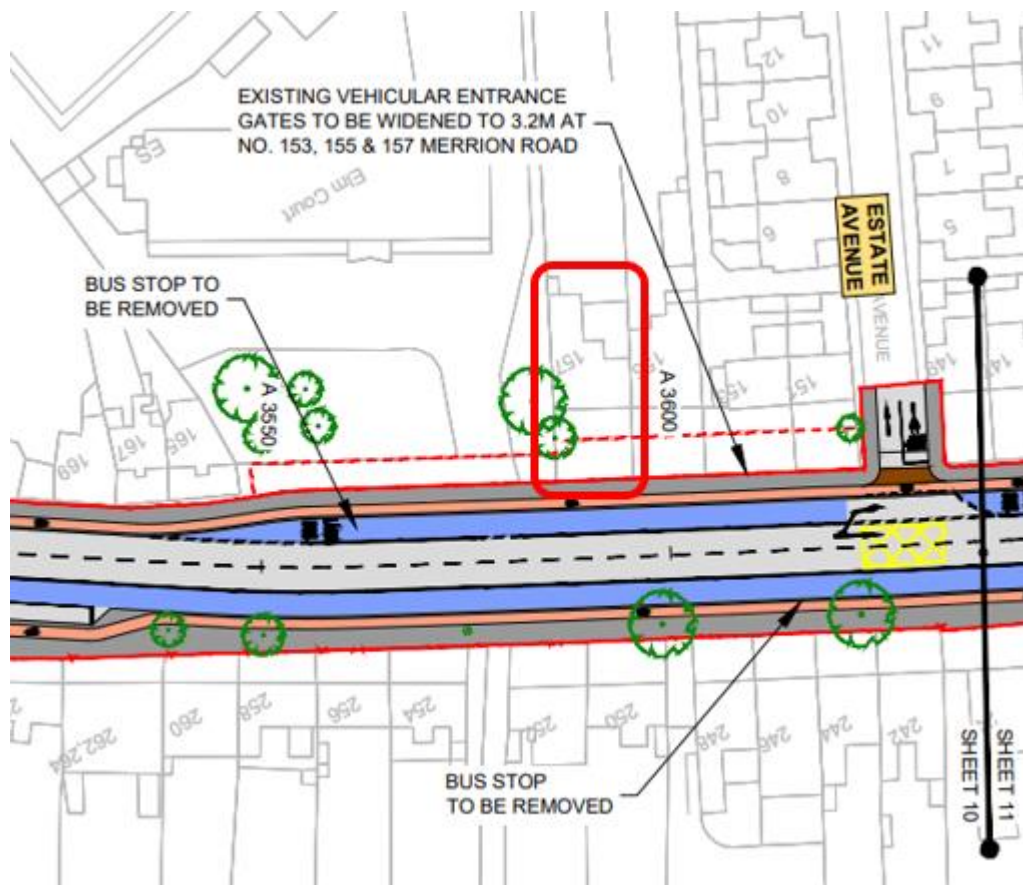


Figure 3.73: Proposed new Layout at 157 Merrion Road



Figure 3.74: Existing aerial view at 157 Merrion Road (Image Source: Google)



Figure 3.75: Existing Street View at (Image Source: Google)

Summary of Objection

This objection raised five potential issues as follows:

- i. Extent of CPO and impact on property

The submission states that the proposed CPO would have a disproportionate effect on the property and result in an increased risk to the owners during both the construction and operation stages.

ii. Cultural Heritage

The submission states that the proposed CPO will result in the removal of period walls and railings from the property.

iii. Car Parking and Access

The submission states that it is unclear whether there will be space to park upon completion of the works. Furthermore, it states that there will be increased risk/hazard entering or exiting the property as there will be need to cross a far greater area to gain access to the road and the vehicles may need to block the cycle track or bus lane to enter/exit.

iv. Removal of Cycle Facilities as Alternative Route exists

The submission offers an opinion that the cycle facility along Sandymount Strand provides a reasonable alternative for cyclists traveling to/from the city and as such cycle facilities could be dropped by the proposed scheme along Merrion Road

v. Enjoyment and Amenity of Property

The submission states that the proposed scheme would constitute an infringement of the owners' rights to the quiet enjoyment of their property.

Response to Objection Raised

i. Extent of CPO and impact on property

The permanent acquisition will result in the loss of between 0.7m to 0.8m with an additional 5.0m temporarily required to allow for the construction of boundary treatment works and tying into the existing garden/driveway. The edge of the proposed bus lane will be 0.4 to 0.5m closer to the residence than the kerb of the existing general traffic lane. The 9.0m long front boundary wall will be at least 6.2m from the steps at the front of the house. It is believed that this would not introduce any additional risk to the owners during the operation of the proposed scheme and that this will not hinder the ability to park in the driveway.

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

As noted in section 5.10.5 of Chapter 5 of the EIAR, the requirements of the Safety, Health and Welfare at Work Act 2005, the Safety, Health and Welfare at Work (Construction) Regulations, 2013 and other relevant Irish and EU safety legislation will be complied with at all times. As required by the Regulations, a Health and Safety Plan will be formulated which will address health and safety issues from the design stages through

to the completion of the Construction Phase. This plan will ensure that all works are undertaken in a safe manner.

ii. Cultural Heritage

Appendix A16.2 Inventory of Architectural Heritage Sites in Volume 4 of the EIAR outlines the locations of the Protected Structures along the Proposed Scheme which includes the referenced RPS 542 and 542a houses at 155 - 157 Merrion Road. The impact of the proposed works at this location is set out in section 16.4.3.1. This section notes that the existing boundary consists of wrought and cast-iron railings in cut granite and red brick plinths with wrought and cast-iron gates terminating in red brick piers topped with granite capstones. The material contents of the existing boundary are to be repositioned to facilitate a land take which will accommodate a bus and cycle lane. The buildings are of Regional Importance and Medium Sensitivity. The Magnitude of the impact is Medium. The potential Construction Phase impact is Direct, Negative, Moderate and Permanent.

However, mitigation is proposed in section 16.5.1.1 of the EIAR where it states that the mitigation is for recording the existing boundaries in position prior to the commencement of construction works. The affected masonry, brickwork, railings, gates, gate posts, capping stones are to be labelled prior to their careful removal to safe storage, and their reinstatement on new lines, reinstating the existing details, and the relationships between the entrances and the historic buildings. Recording is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor. The architectural heritage specialist will oversee the labelling, taking down and reinstatement of the affected gates (which will be widened for safety reasons), the railings, piers, bricks and masonry. Works to historic fabric will be carried out in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR. With mitigation, the impact magnitude is reduced from Medium to Low. The predicted residual impact is Direct, Negative, Slight and Temporary.

iii. Car Parking and Access

As noted in response to item i above, the permanent acquisition will result in the loss of between 0.7m to 0.8m with an additional 5.0m temporarily required to allow for the construction of boundary treatment and tying into the existing garden/driveway. The 9.0m long front boundary wall will be at least 6.2m from the steps at the front of the house. It is believed that this should not hinder the ability to park in the driveway.

It is noted that there is an existing bus lane already in operation outside of 157 Merrion Road. This is retained in the Proposed Scheme and a new cycle track is proposed between the bus lane and the new footpath. The design allows for the safe use of the access as per Appendix A4.1 BusConnects Preliminary Design Guidance Booklet (PDGB) of the EIAR and the principle of how residents can access / egress their properties is unchanged by the Proposed Scheme. The Road Safety Audits undertaken for the Proposed Scheme, included as Appendix M of the Preliminary Design Report provided in the Supplementary Information, did not highlight any safety issues with the proposed access and parking arrangement in this regard.

Also, under S.I. No. 182/1997 Section 13 Driving on Footway, a vehicle is allowed to be driven across the footpath for the purpose of access to or egress from a place adjacent to the footpath, and in accordance with S.I. No. 182/1997 Section 14 Cycle Tracks, that a vehicle is also allowed to be driven across the cycletrack for the purpose of access to or egress from a place adjacent to a cycle track. It is not anticipated that entry / exit to / from the property will result in any prolonged blocking of the bus lane, cycle track or footpath.

iv. Removal of Cycle Facilities as Alternative Route exists

Section 2.2.1.3 of Chapter 2 of the EIAR summarises the Greater Dublin Area (GDA) Cycle Network Plan (hereafter referred to as the GDACNP) and the context of the

proposed scheme within it. The EIAR states that the GDACNP (NTA 2013), was adopted by the NTA in early 2014 following a period of consultation with the public and various stakeholders.

This plan forms the strategy for the implementation of a high quality, integrated cycle network as set out in the GDA Transport Strategy.

Extracts from the GDACNP are shown in Figure 3.76, which highlights the Proposed Scheme in the context of the planned cycle network. There are two primary cycle routes (Cycle Route 13 and Cycle Route 13A) identified running along the majority of the Proposed Scheme, as well as Secondary Cycle Routes on Nutley Lane (S04) and Fitzwilliam Street (C7). The Proposed Scheme also intersects with two other primary cycle routes, namely SO1 and SO3 (the Grand Canal Greenway and the Dodder Greenway respectively) as well as a number of secondary cycle routes (including Cycle Routes SO2, SO6, 13E). In addition, a proposed greenway (N5 East Coast Trail) is identified running parallel to a section of the corridor.



Figure 3.76: Extract from GDA Cycle Network Plan (proposed scheme highlighted in yellow for information)

The Proposed Scheme, which is supported by the GDACNP for the area, is needed to address the significant deficiency in the very limited segregated cycling infrastructure currently available on this corridor. As can be seen in Figure 3.76, the primary route for cyclists (route 13) is along the R118 Merrion Road and caters for cycle access to religious, educational and employment hubs in the Merrion Village area such as St. Vincent’s University Hospital, Our Lady Queen of Peace Church, St. Michael’s College, the Merrion Shopping Centre, Elm Park Golf and Sports Club and RTÉ, as well as residential developments in the Merrion Village area. As such, it is not considered that the Strand Road cycle route (secondary route 13E/N5) is a suitable alternative should it be implemented in a permanent state.

v. **Enjoyment and Amenity of Property**

The submission states that the proposed scheme would constitute an infringement of the owners rights to the quiet enjoyment of their property.

As set out in Section 17.4.4.2.4 of Chapter 17 Landscape (Townscape) & Visual, the new boundary treatment will be reinstated on a like-for-like basis at a setback location. Overall, there would be a relatively small loss of private / garden area (approximately 0.7m – 0.8m) which will result in a partial loss of landscape amenity space, but there would be no notable change to the key characteristics of these properties.

Chapter 10 of the EIAR assesses the impact of permanent land take acquisition on community facilities and residential properties. Section 10.6.2 identifies that a Negative, Not significant and Long-Term land take impact is expected at 157 Merrion Road.

If the CPO is confirmed by An Bord Pleanála, a Notice to Treat will be served on each landowner whose land is being acquired. Following service of the Notice to Treat, each landowner will be required to submit a claim for compensation and as part of this process, the NTA will pay the reasonable costs (as part of the claim) for the landowner to engage their own agent / valuer in preparing, negotiating, and advising on compensation.

3.2.20 CPO 20 - Salinger Richard

Description of the Proposed Scheme at this location

In order to achieve the proposed Scheme objectives along this section of the corridor on the R118 Merrion Road, it is proposed to provide a footpath, bus lane and general traffic lane in each direction. A one-way cycle track is provided on the inbound/western side of the R118 Merrion Road with a two-way cycle track provided on the outbound/eastern side.

The existing road cross section in this location provides a footpath on each side of the road with one general traffic lane and a bus lane outbound and two general traffic lanes inbound. The proposed two-way cycle track on the outbound/eastern side of the road accommodates proposals for the East Coast Trail (Sutton to Sandycove Greenway) which is being proposed under a separate planning application.

In order to achieve the desired design for the Proposed Scheme and facilitate future maintenance of the signalised junction and its equipment, permanent land acquisition is required from the Elmpark Green development.

The land take required is shown in the following:

- The relevant extract of the EIAR Chapter 4 Proposed Scheme Description Appendix, the General Arrangement drawings in Figure 3.77,
- The existing aerial views in Figure 3.78 and
- The existing street view in Figure 3.79 below.

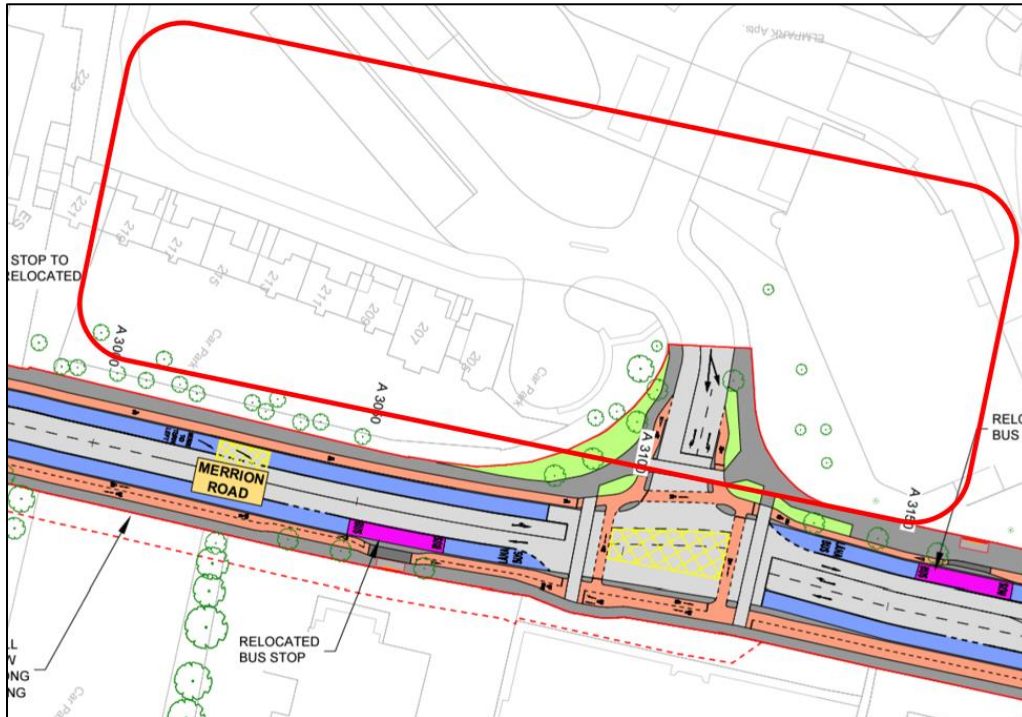


Figure 3.77: Proposed new Layout at Elmpark Green



Figure 3.78: Existing aerial view at Elmpark Green (Image Source: Google)



Figure 3.79: Existing Street View at Elmpark Green (Image Source: Google)

Summary of Objection

This objection raised one potential issue:

i. CPO of Property

The submission states that they are opposed to the CPO on the grounds that this is the resident's principal private residence where he has resided since 2008.

Response to Objections Raised

i. CPO of Property

The CPO notice and accompanying CPO server maps issued to Mr. Salinger dated May 12 2022 outlined the proposed Compulsory Purchase Order under the Belfield / Blackrock to City Centre Core Bus Corridor Scheme (the Proposed Scheme) for an area of land at the entrance junction to Elmpark Green on the Merrion Road (plot reference 1042(1).1e). The reason that this area of land is being permanently acquired is to facilitate the proposed works as well as facilitate future maintenance of the signalised junction. The area in question falls within a larger ownership plot within which the Elmpark Green development is located. As Mr. Salinger is a resident/occupier of the Elmpark Green development (at 17, Heskin Court), he is an interested party to the proposed acquisition. It should be noted that 17, Heskin Court itself, as a residential unit, does not form part of the proposed CPO for the Proposed Scheme. It is further noted that access to Mr Salinger's property will be maintained during both the operation and construction of the Proposed Scheme.

We have clarified the above in communication with Mr Mehigan (acting on behalf of Mr Salinger) in a letter dated July 20 2022 following receipt of the same letter received by An Bord Pleanála.

3.2.21 CPO 21 - Tesco Ireland Limited

This submission raises potential issues at two locations along the scheme where there are Tesco stores, and the submission author has an interest. It is noted that CPO is only required at one of these locations, Merrion Shopping Centre, and the other is a general observation in relation to proposals in the vicinity of the Tesco store on Baggot Street Upper. It is further noted that this submission is not an

objection but rather seeks clarifications on proposals and consideration of amendments. A response is provided to each location and the issues raised are provided separately in the following sections.

Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor, it is proposed to provide a footpath, cycle track, bus lane and general traffic lane in each direction.

The existing road cross section in this location provides a footpath on each side of the road with one general traffic lane and a bus lane inbound and two general traffic lanes and a bus lane outbound.

In order to achieve the desired design for the Proposed Scheme, permanent and temporary land acquisition is from a number of properties in this area including Merrion Shopping.

The land take required is shown in the following:

- The relevant extract of the EIAR Chapter 4 Proposed Scheme Description Appendix the General Arrangement drawings in Figure 3.80,
- The existing aerial views in Figure 3.81 and
- The existing street view in Figure 3.82 below.

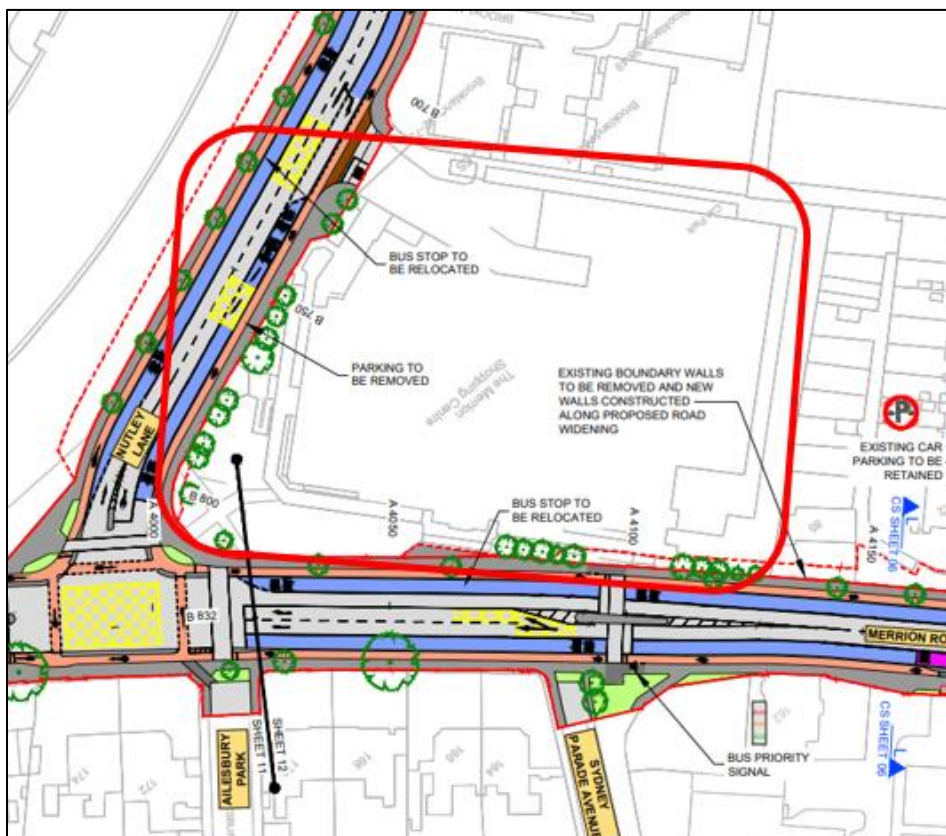


Figure 3.80: Proposed new Layout at Merrion Shopping Centre



Figure 3.81: Existing aerial view at Merrion Shopping Centre (Image Source: Google)



Figure 3.82: Existing Street View at Merrion Shopping Centre (Image Source: Google)

Summary of Clarification

It is noted that this submission does not raise an objection to the CPO as proposed but does make the following requests for clarification as follows:

- i. CPO and Potential Impact on Pedestrian Access During Construction

The submission seeks clarification regarding CPO of plot 1004(4).2c at Merrion Shopping Centre and whether the CPO relates to both the ramp and footpath at this entrance to the

shopping centre. Clarification is sought as to whether there will be any disruption to the current access arrangements during the works. If impacted, it is noted that this would be disruptive, especially for mobility impaired customers.

The submission also seeks clarification on the timing and duration of the temporary acquisition of the lands.

Response to Clarification

i. CPO and Potential Impact on Pedestrian Access During Construction

With regard to CPO plot 1004(4).2c, this area incorporates the access ramp into the shopping centre. This is required to facilitate reconstruction of the ramp following the minor setback of the adjacent boundary wall to achieve the required scheme cross-section. It is likely that during the works in this area that the access ramp will need to be closed. While the duration of any closure will be minimised, a detailed plan will be put in place to provide adequate signage for users wishing to use the ramp to direct them to the Nutley Lane access to the shopping centre where level access is available.

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

In terms of the timing of the temporary acquisition of the lands, it is not possible at this stage to identify when this will occur as it is subject to many variables including planning process, government approvals and tender process. However, this will be communicated to the landowner throughout the process following any planning approval.

In terms of the duration of the temporary acquisition, as set out in section 5.3.3.1 of the EIAR, it is anticipated that works in this section (between Nutley Lane and Shrewsbury Road) will take approximately 8 months to complete. However, it is likely that works in the vicinity of the Shopping Centre will be undertaken in a shorter timeframe thus minimising the impact on access to the Shopping Centre.

Description of the Proposed Scheme at Baggot Street Upper

In order to achieve the scheme objectives along this section of the corridor, it is proposed to provide a footpath, cycle track, bus lane and general traffic lane in each direction. Car parking and loading bays are also provided in this area.

The existing road cross section in this location provides a footpath on each side of the road with two general traffic lanes in each direction. On-street car parking and loading facilities are also provided.

As noted earlier in this section, there is no CPO required in this location.

The site location is shown in the following:

- The relevant extract of the EIAR Chapter 4 Proposed Scheme Description Appendix the General Arrangement drawings in Figure 3.83,
- The existing aerial views in Figure 3.84 and
- The existing street view in Figure 3.85 below.

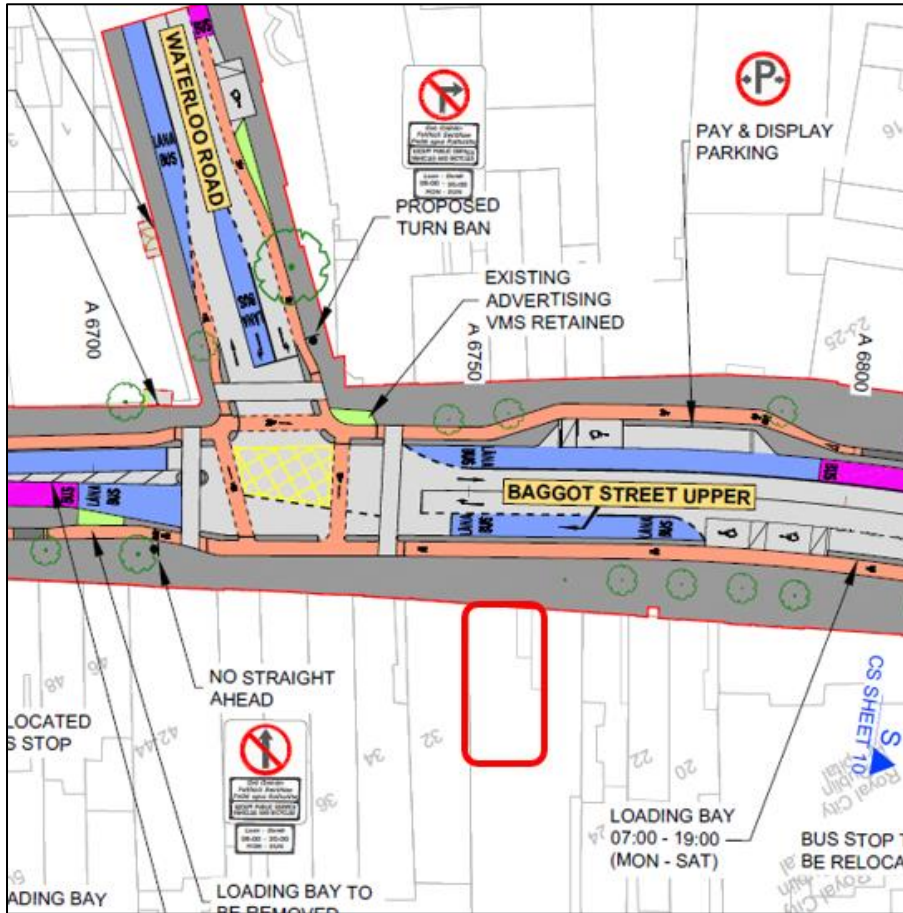


Figure 3.83: Proposed new Layout at Tesco Baggot Street Upper



Figure 3.84: Existing aerial view at Tesco Baggot Street Upper (Image Source: Google)



Figure 3.85: Existing Street View at Tesco Baggot Street Upper (Image Source: Google)

Summary of Clarification

- i. Loading Bay Provision and Cyclist Safety at Loading Bay

In relation to the Tesco store on Baggot Street Upper, the submission states that the proposed scheme reduces the availability of loading bays in the immediate vicinity of the store which could have significant impacts on the operation of the store. The proposed loading bay on East Moreland Place is considered to be too far from the store.

The submission also states that there are concerns regarding cyclist and staff safety at the loading bays due to the presence of the cycle track between the loading bay and footpath. Clarification is also sought on whether there will be segregation between the cycle track and loading bay, and if this will be dropped to facilitate deliveries.

Response to Clarification

i. Loading Bay Provision and Cyclist Safety at Loading Bay

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

It is noted that in the immediate vicinity of Tesco on Baggot Street, it is proposed to provide loading facilities which are formed partially by a dedicated loading bay and partially by a dual use loading bay/taxi rank. Combined, these provide 42m of dedicated loading facilities between 07:00 and 19:00. This increases the loading provision in this area compared to the existing situation where only 26m of loading bay/taxi rank is provided in the immediate vicinity of the Tesco store. It is acknowledged that the proposed loading bay location is offset from its current location but will only be c.40m from the Tesco store which is considered to be acceptable.

For clarity, the proposed loading bay on Eastmoreland Place is proposed to offset the loss of a loading bay in front of 46-50 Baggot Street Upper.

In relation to proposed arrangement at loading bays, Section 6 of Appendix A4.1 BusConnects Preliminary Design Guidance Booklet (PDGB) of the EIAR sets out the guidance for the design of parking and loading bays. The routing of cyclists between the loading bay and footpath has been identified the safest arrangement for cyclists in these areas as it affords the most physical protection from passing traffic. As noted in Section 6 of Appendix A4.1, the loading bay details are such that they won't inhibit loading activities. Therefore, chamfered kerbs with a maximum height of 60mm should be used which will facilitate trollies, pallet trucks etc. Figure 13a in Section 6 illustrates a cross section for the detail at loading bays which is reproduced below.

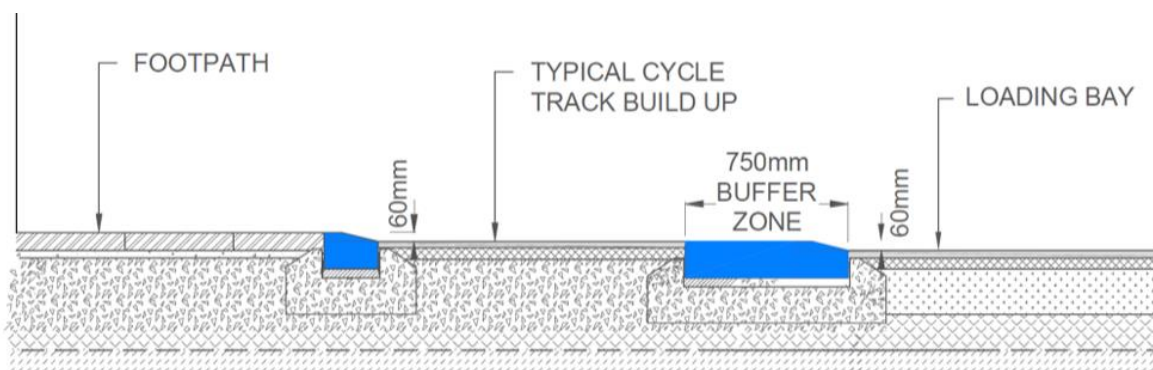


Figure 3.86: Proposed Loading Bay Cross Section with Chamfered Kerbs

It is worth highlighting that the design in this location allows for the safe use of the loading as per the design standards. The Safety Audits undertaken for the Proposed Scheme, included as Appendix M of the Preliminary Design Report provided in the Supplementary Information did not highlight any safety issues with the proposed arrangement in this regard.

3.2.22 CPO 22 - Vaughan Eileen

Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor, it is proposed to provide a footpath, cycle track and bus lane/general traffic lane in each direction. A bus gate is also provided in front of the subject property.

The existing road cross section in this location provides a footpath on each side of the road with two general traffic lanes inbound and a single traffic lane outbound. An on-street loading bay is also provided on the outbound side of the carriageway

In order to achieve the desired design for the Proposed Scheme in this area, temporary land acquisition is from 1-11 Pembroke Road. This acquisition is required in order to undertake boundary works necessary to facilitate the bus gate.

The land take required is shown in the following:

- The relevant extract of the General Arrangement Drawings in the EIAR, Volume 3, Chapter 4 Proposed Scheme Description Figures, as per Figure 3.87 below;
- The existing aerial views in Figure 3.88, and
- The existing street view in Figure 3.89.

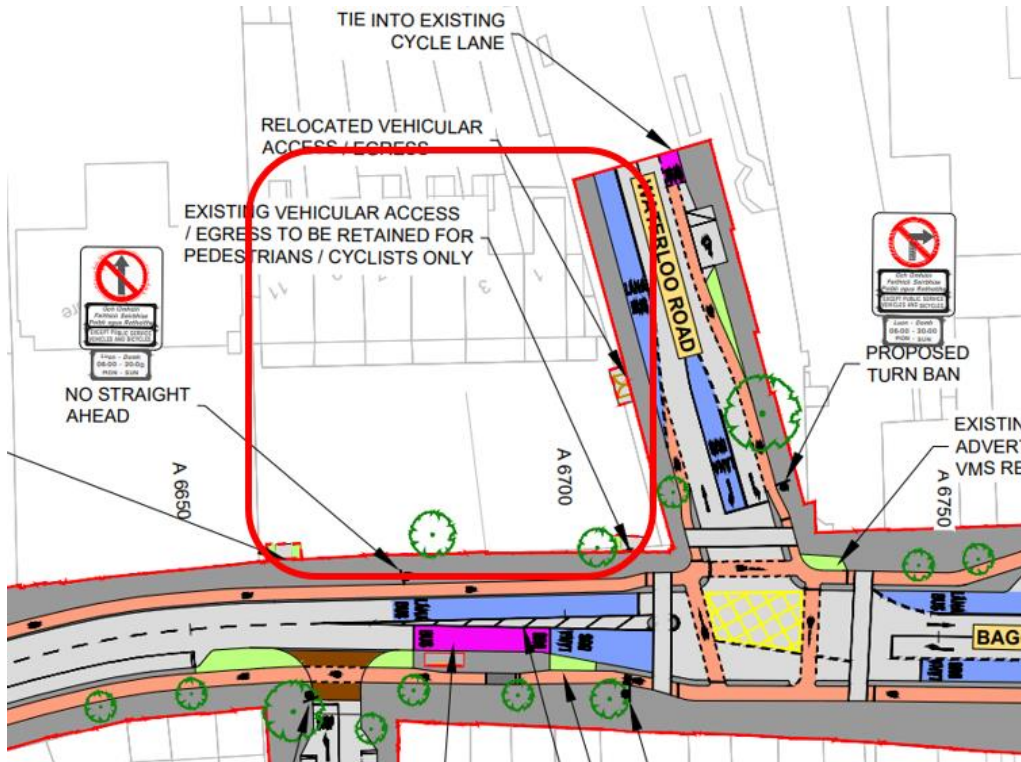


Figure 3.87: Proposed new Layout at 1-11 Pembroke Road



Figure 3.88: Existing aerial view at 1-11 Pembroke Road (Image Source: Google)

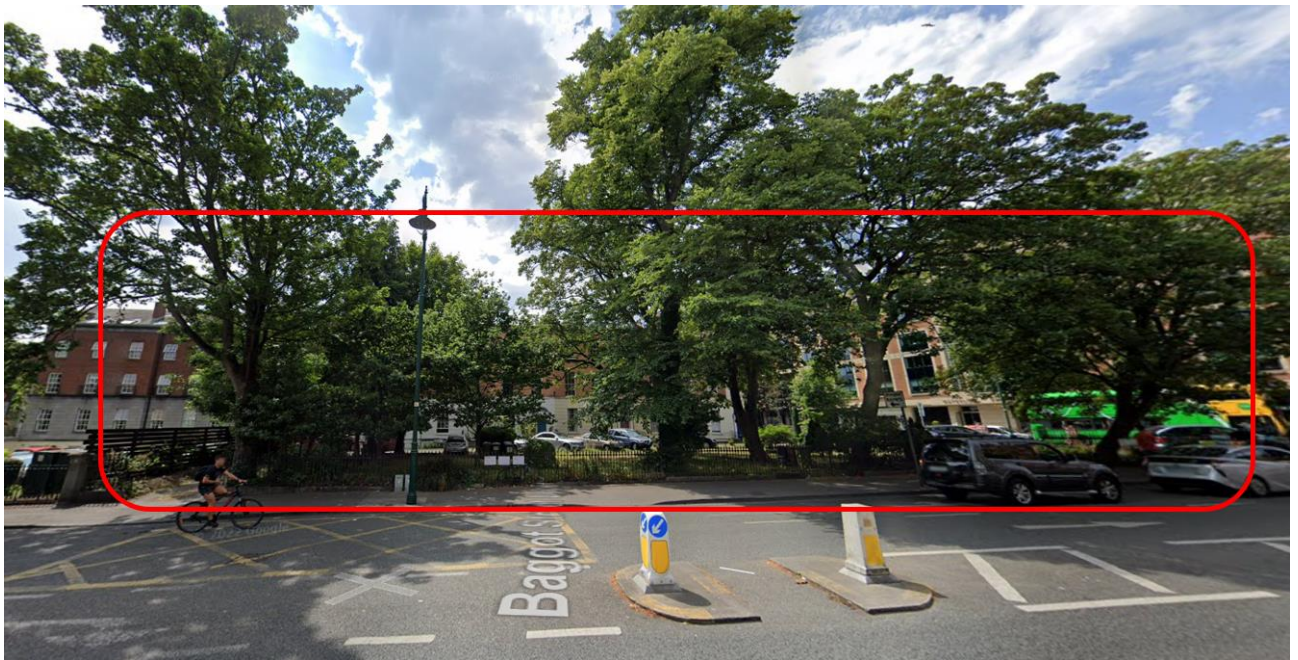


Figure 3.89: Existing Street View at (Image Source: Google)

Summary of Objection

This objection raised two potential issues as follows:

- i. Safety as a result of proposals and increased bus numbers

The submission cites concerns that the increase in bus volumes associated with the proposed scheme would endanger residents and visitors to the area.

- ii. Alternative Routing of buses along Northumberland Road

The submission offers an opinion that all modes should not be facilitated on the same corridor suggesting that buses should be routed along Northumberland Road and onwards to the city via Mount Street.

Response to Objection Raised

- i. Number of buses proposed along Pembroke Road

The aim of the Proposed Scheme is to provide enhanced walking, cycling and bus infrastructure on this key access corridor in the Dublin region, which will enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor. The proposed scale of the BusConnects CBC Infrastructure Works will be transformational for walking and cycling in Dublin, delivering a large number of the primary cycling routes identified in the Greater Dublin Area Cycle Network plan. With proposals of this scale, it is critical that the overall design approach matches the stated ambition and can achieve a longevity that such investment deserves. With this in mind, the NTA set about developing 'Design Principles' for the project. These principles would complement existing documents and standards such as the National Cycle Manual and the Design Manual for Urban Roads and Streets (DMURS). A Preliminary Design Guidance Booklet (Refer to Appendix O to the

Preliminary Design Report in Supplementary Information) was developed to outline the agreed design principles and to enable consistency of design.

The PDGB draws on international best practice from countries at the forefront of active travel infrastructure design and delivery such as the Netherlands, Denmark and the UK and has been peer reviewed by international experts from each of these countries. The Proposed Scheme has been designed in accordance with the PDGB and other best practice guidance documents to ensure that all designs are safe and comfortable for pedestrians and cyclists, in line with the road user hierarchy set out in DMURS.

An independent, Stage 1 Road Safety Audit was carried out on the Proposed Scheme by PMCE and is included in Appendix M to the Preliminary Design Report. This audit did not envisage any safety issues with respect to the pedestrian and cyclist facilities proposed on Pembroke Road.

EIAR Volume 2 Chapter 6, Traffic and Transport documents the baseline conditions with respect to walking and cycling on Pembroke Road and assesses the Proposed Scheme against this baseline. In relation to pedestrian facilities the results of this assessment demonstrate that the Level of Service (LoS) for pedestrians in the Do Minimum (existing infrastructure) scenario is typically of C/D rating. In the Do something (Proposed Scheme) scenario this LoS typically increases to a A/B rating. This is categorised as a Positive, Slight to Significant and Long-term impact in terms of the level of service of pedestrian facilities on Pembroke Road.

In relation to cycling facilities the results of this assessment demonstrate that the LoS for cyclists in the Do Minimum (existing infrastructure) scenario is of D rating throughout. In the Do something (Proposed Scheme) scenario this LoS increases to an A rating throughout. This is categorised as a Positive, Very Significant and Long-term impact in terms of the level of service of cycling facilities on Pembroke Road.

While there will be an increase in bus numbers as part of the BusConnects Network Redesign, it is important to acknowledge that as a result of the Proposed Scheme, there will be a significant reduction in traffic volumes along the corridor. This is particularly evident in the vicinity of Pembroke Road and Baggot Street where volumes will decrease by up to almost 1,000 passenger car units (PCUs) in the morning peak period as demonstrated in the Figure 3.90 which reproduces table 6.65 from Chapter 6 of the EIAR. It is noted that similar reductions are noted in the PM peak as presented in Table 6.69 of Chapter 6 of the EIAR. The reduction in traffic volumes, combined with the significant improvements to pedestrian and cycle facilities as noted above, will result in a safer environment for vulnerable road users.

Table 6.65: Road Links that Experience a Reduction of ≥ 100 Combined Flows during 2028 AM Peak Hour (Direct Study Area)

Location	Map I.D.	Road Name	Do Minimum Flows (PCUs)	Do Something Flows (PCUs)	Flow Difference (PCUs)
Section 1 – R827 Stradbroke Road to L1003 Booterstown Avenue	S.1	Temple Hill	1,643	608	-1,035
		Temple Road	867	380	-488
		Frascati Road	1,754	680	-1,074
		Rock Road South of Booterstown	1,819	938	-881
Section 2 – L1003 Booterstown Avenue to Nutley Lane	S.2	Rock Road North of Booterstown	2,160	1,178	-981
Section 3 – R118 Merrion Road to Ballsbridge	S.3	Merrion Road South of Nutley Lane	1,431	781	-651
		Merrion Road North of Nutley Lane	2,420	1,545	-875
Section 4 – Ballsbridge to Merrion Square	S.4	Pembroke Road	1,085	101	-984
		Baggot Street Upper	1,274	322	-952
		Baggot Street Lower	430	113	-317
		Fitzwilliam Street Upper	665	316	-349
Section 5 – R138 Stillorgan Road to R118 Merrion Road – Nutley Lane	S.5	Nutley Lane	1,112	892	-220

Figure 3.90: Extract from Chapter 6 of the EIAR outlining road links which experience traffic reduction during the 2028 AM Peak Hour

ii. Alternative Routing of buses along Northumberland Road

Chapter 2 of the EIAR, Need for the Scheme, sets the context for the transport need for the Proposed Scheme. It is noted in section 2.2.1.6 of this chapter that:

“The Dublin Area Bus Network Redesign Revised Proposal (October 2019) (NTA 2019) presented information on ‘patterns of demand’. Image 2.5 is an extract of the Combined Activity Density map for areas local to the Proposed Scheme, which combines residential, employment, and student enrolment densities to approximate the total effect of all densities in representing potential demand for public transport.”

Figure 3.91 and Figure 3.92 are extracted from Chapter 2 of the EIAR and present the combined activity density along the route of the Proposed Scheme. It is evident from these figures that there is a greater combined activity density along the route of the Proposed Scheme, i.e. along Pembroke Road and Baggot Street Upper, when compared with the alternative route raised in these submissions, i.e. along Northumberland Road and Mount Street.

The Preferred Route Option report included in the Supplementary Information further outlines the justification for the route of the Proposed Scheme via Pembroke Road, as outlined below:

“It is considered that the options assessment presented in the ‘Dún Laoghaire to City Centre Core Bus Corridor Options Study – Feasibility and Options Assessment’ has appropriately assessed route options and that the selected corridor offers the most benefits for pedestrians, cyclists, and buses. That assessment compared route options via Pembroke Road and Northumberland Road. The route via Pembroke Road was considered to be the preferred route forming the EPR Option.

The UCD Ballsbridge to City Centre Section of the Proposed Scheme is routed via Pembroke Road for reasons including the following:

- *To improve the integration with new and existing sustainable transport facilities on the street itself and through Baggot Village;*

- To provide cycle facilities on the Secondary Route of the GDA Cycle Network Plan; and
- To increase the catchment of the Proposed Scheme in terms of Combined Activity Density – refer to Figure 3.2 within Chapter 3.2.2.1 of this report.”

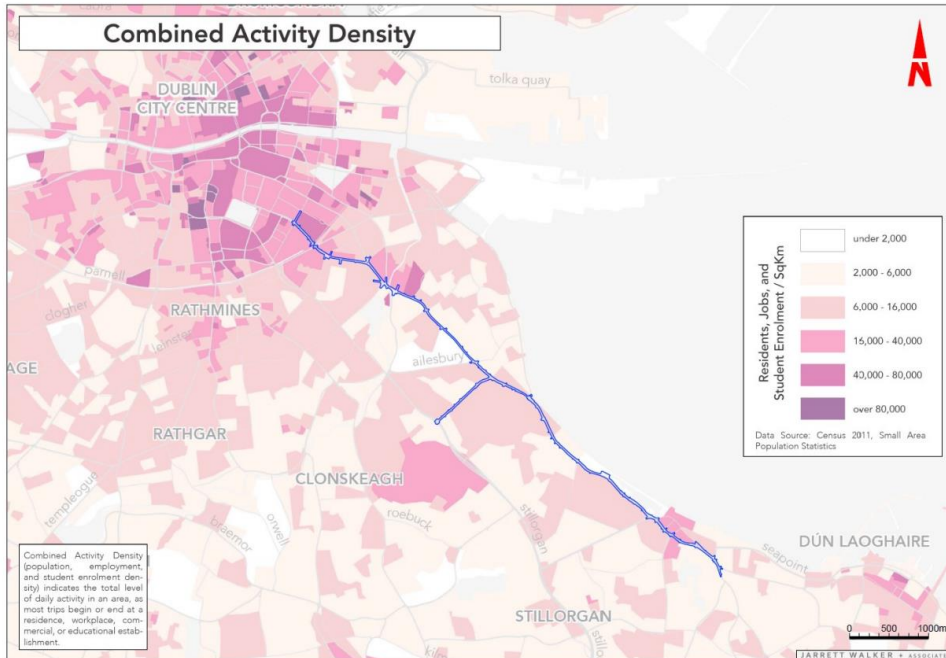


Image 2.5: Combined Activity Density Map (Dublin Area Bus Network Redesign Revised Proposal (NTA 2019). Proposed Scheme Highlighted in Blue for Information.

Figure 3.91: Combined Activity Density Map



Figure 3.92: Annotated Extract from Combined Activity Density map in the Baggot Street Upper Area

Chapter 3 of the EIAR, Consideration of Reasonable Alternatives, outlines the Options Assessment process in determining the Preferred Route Option. During the initial assessment stage, the Proposed Scheme consisted of two separate Core Bus Corridors (CBCs), namely the Dún Laoghaire to City Centre CBC and the Ballsbridge to UCD CBC. These CBCs were subsequently combined to form the Proposed Scheme. In determining the Emerging Preferred Route (EPR), the Dún Laoghaire to City Centre CBC scheme was divided into three sub-sections (Study Area Section - SAS) for further assessment and refinement (see Figure 3.93). As noted, the third section, SAS3 was included in the original assessment but subsequently removed from the Proposed Scheme.

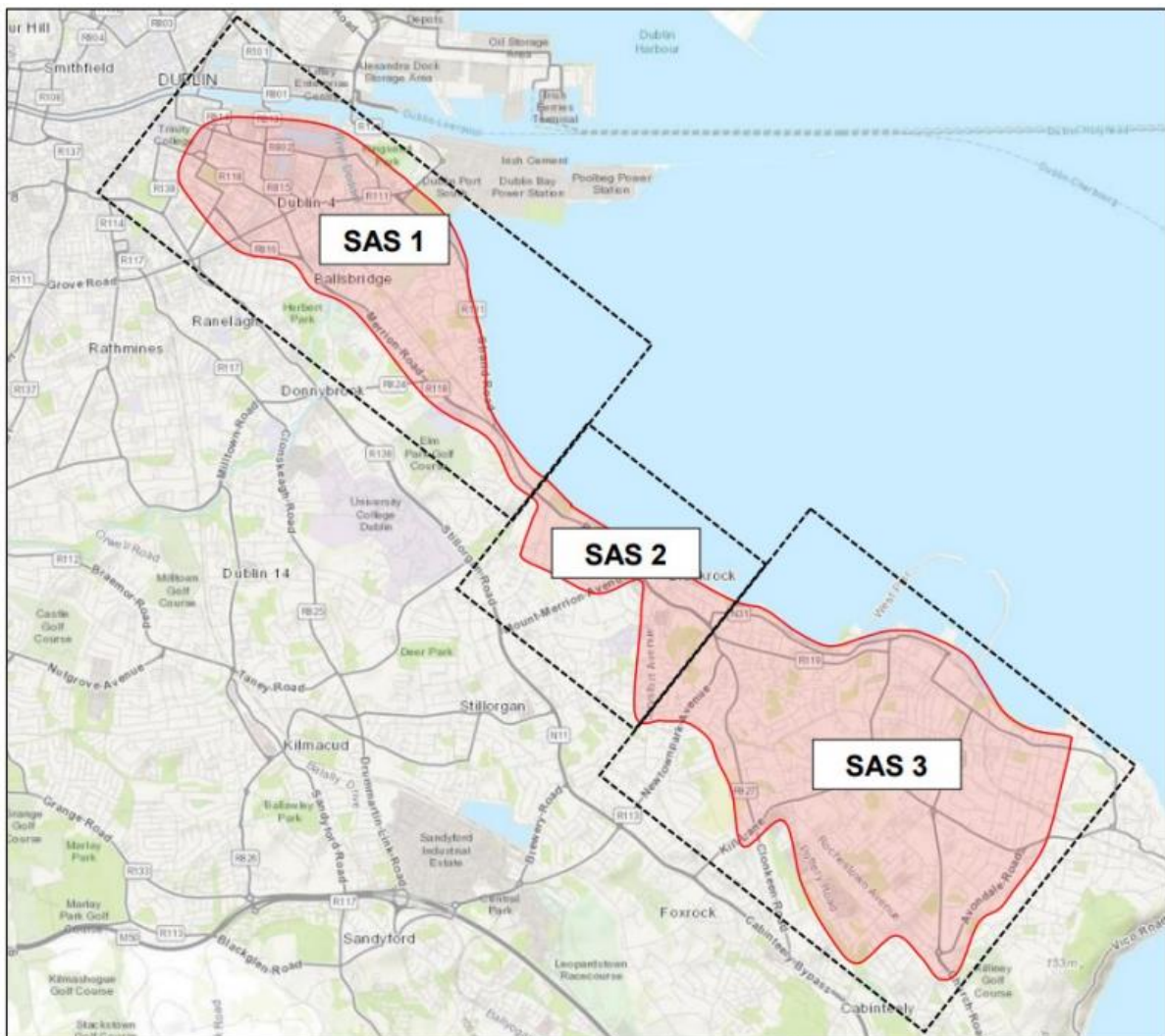


Figure 3.93: Stage 2 Route options sub-section division extracted from ‘Dún Laoghaire to City Centre Core Bus Corridor Options Study – Feasibility and Options Assessment’

In relation to sub-section SAS1, following the Stage 1 sifting process, two viable route options for sub-section SAS1, were taken forward for assessment and further refinement:

- Route Option N1: A route option via Merrion Road, Pembroke Road and Baggot Street Lower; and
- Route Option N2: A route option via Merrion Road, Northumberland Road and Merrion Square North.

These routes are presented in Figure 3.94.

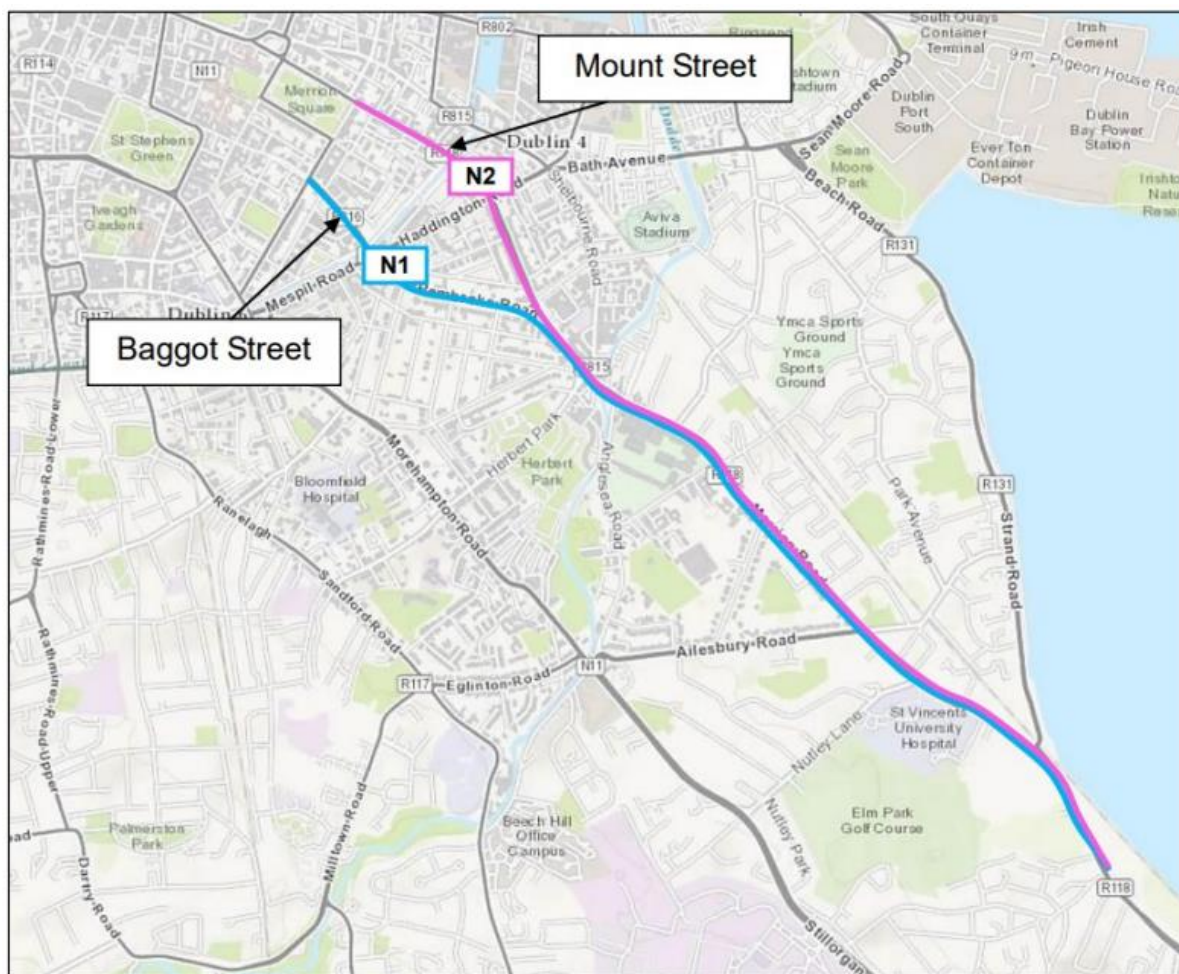


Figure 3.94: Sub-section SAS1 Route Options extracted from ‘Dún Laoghaire to City Centre Core Bus Corridor Options Study – Feasibility and Options Assessment’

Two scheme options were considered along each route which would provide traffic lanes, bus lanes and cycle tracks in each direction. The primary difference between these scheme options was the treatment at the junctions (Option 2 of each route required buses to share with left-turning traffic at junctions). The assessment sub-criteria which were differentiators between scheme options included Capital Cost, Transport Reliability and Quality, Residential Population and Employment Catchments, Traffic Network Integration and Land Use Character.

Route N1 Option 2 was identified as having significant benefits over other options in relation to both Capital Cost and Land Use Character. Following a detailed MCA, route N1 Option 2 was identified as the preferred option for this section and was brought forward into the Emerging Preferred Route.

In terms of capital cost, Route N2 Option 1 was identified as costing considerably more than other options, largely due to the quantity of private land-take required. Conversely, N1 Option 2 was identified as the lowest costing due to the reduced level of land acquisition required.

When the options were considered under the Land Use Character sub-criteria, Route Options 3 and 4 (via Northumberland Road) were considered to have some disadvantages when compared to Route Options 1 and 2 (via Pembroke Road and Baggot Street Upper), with Route Option 2 presenting further advantages over Option 1.

In all four options, a large number of trees and on-street parking provision was expected to be affected, however, to a greater extent on Route Options 3 and 4 on Northumberland Road, with the lowest impact being under Route Option 2. Route Option 2 was therefore considered to have advantages given the lower impact on existing land use character.

Route Option 2 was identified as the Emerging Preferred Route for this section of the Proposed Scheme. Route Option 2 was therefore brought forward into the overall Emerging Preferred Route. This option was subsequently confirmed as the Preferred Route Option for this section of the Proposed Scheme.

3.2.23 CPO 23 - Wappinger Food Corporation Limited

Description of the Proposed Scheme at this location

In order to achieve the scheme objectives along this section of the corridor, it is proposed to provide a footpath, cycle track, bus lane and general traffic lane in each direction. It is also proposed to realign the junction to remove the stagger between Herbert Park and Shelbourne Road allowing a more conventional alignment which better serves all modes.

The existing road cross section in this location provides a footpath on each side of the road with two general traffic lanes in each direction and a left turn flare provided for traffic turning from Pembroke Road to Herbert Park.

In order to achieve the desired design for the Proposed Scheme in this area, permanent land acquisition is from Roly's Bistro. This acquisition is required in order to facilitate the proposed junction arrangement between Pembroke Road/Shelbourne Road/Herbert Park.

The land take required is shown in the following:

- The relevant extract of the EIAR Volume 3 Chapter 4 Proposed Scheme Description Figures, General Arrangement drawings in Figure 3.95,
- The existing aerial views in Figure 3.96 and
- The existing street view in Figure 3.97 below.

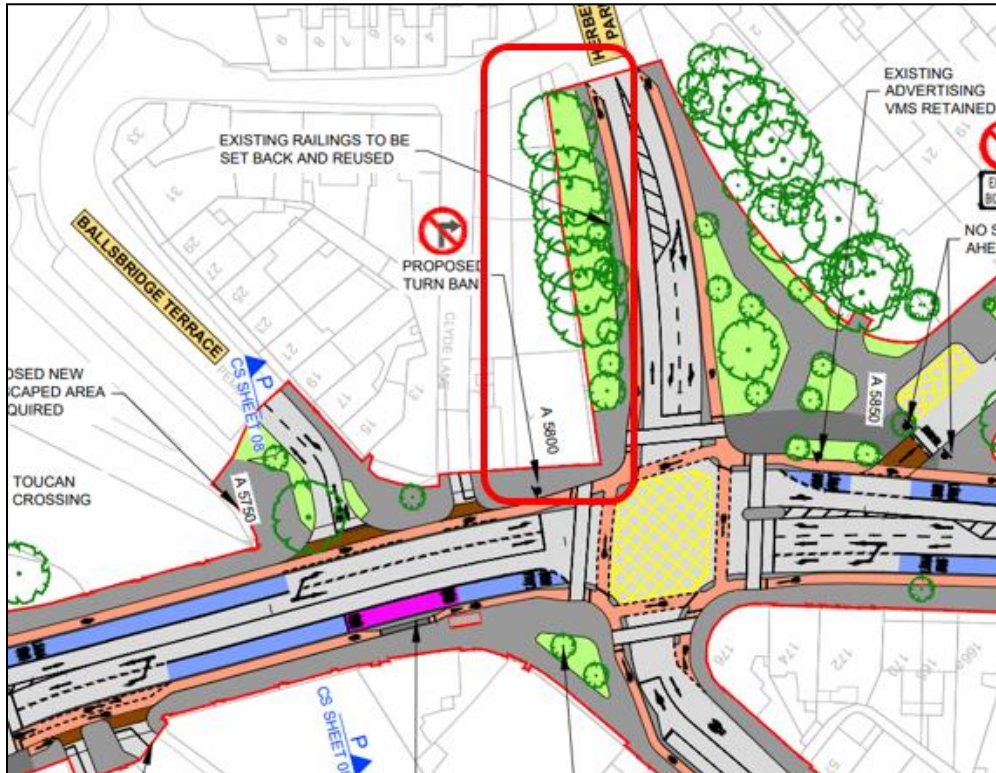


Figure 3.95: Proposed new Layout at Roly's Bistro Merrion Road



Figure 3.96: Existing aerial view at Roly's Bistro Merrion Road (Image Source: Google)



Figure 3.97: Existing Street View at Roly's Bistro Merrion Road (Image Source: Google)

Summary of Objection Raised

This objection raised two potential issues as follows:

- i. New pergola structure has not been taken into account in the proposed scheme

The submission states that the recently completed pergola structure adjacent Roly's has not been considered in the proposed design. It is suggested that the impact on this land could be avoided by realigning the Herbert Park approach.

It is also noted that the proposed arrangement would result in an impact on the heritage plinth and result in the removal of trees from the area.

- ii. Impact on Biodiversity

The submission states the park adjacent to Roly's supports a habitat of ecological significance, the likes which are commonly used by bats for roosting. The submission notes that no bat surveys were carried out in the vicinity of Roly's Bistro which is a significant omission

Response of Objection Raised

- i. New pergola structure has not been taken into account in the proposed scheme

As set out in the submission received, the land in question adjacent Roly's Bistro is owned by Dublin City Council. It is noted that Wappinger Food Corporation Limited (WFCL) entered into an agreement with DCC whereby an external dining pergola structure was added to the gable of Roly's Bistro and a licence to occupy the land was granted by DCC. It is submitted that this was constructed in response to the Covid 19 pandemic and to facilitate outdoor dining.

It is noted that DCC in their submission to ABP as part of the Proposed Scheme, note that the pergola as described above is an unauthorised extension.

This opinion was also shared with the NTA during discussions prior to the Proposed Scheme being submitted to ABP for planning approval. It is for this reason the pergola was not assessed in the EIAR.

Notwithstanding this, this response has now been prepared to assess the impact of the land take on Roly's Bistro and what change this would make to the final assessment presented in Chapter 10 Population of the EIAR.

The Proposed Scheme would require the removal of the pergola adjoining the existing restaurant. As this is a permanent land take impact it would be assessed within the Operational Phase Economic Assessment, specifically Section 10.4.4.2.2.1 with the impact captured within Table 10.12 'Land Take Impacts on Commercial Receptors during the Operational Phase'.

Following the DMRB guidance, the removal of the structure is expected to result in a medium magnitude of impact as there would be a change in operating conditions but not compromising the overall viability of the business i.e., the business could still operate successfully without the pergola structure, as it would have prior to its construction. The business is assigned a medium sensitivity (as it is an existing employment site < 1ha). The overall significance of effect (using Table 10.2) that results from a medium sensitivity and magnitude is a negative, moderate, long term but not significant land take impact on the business.

This impact does not affect the overall impact on the Donnybrook community area which is assessed as Negative, Not Significant and Long-Term (Table 10.14).

It is submitted that the proposed land take could be avoided by redesigning the junction and shifting the alignment of the Herbert Park approach further west. The proposed junction design has been subject to a number of design iterations throughout the design process. The evolution of the design is detailed in the Junction Design Report contained in Appendix A6.3 of the EIAR. While the specifics of the junction layout have changed over time, the overall principle to realign Herbert Park to create a standard 4-arm crossroads has been retained through the process. This proposal is central to meeting the scheme objectives at this location by providing a much-improved layout for all road users especially pedestrians and cyclists who would benefit from a simplified crossing arrangement of all approaches as well as a more legible junction with less conflict points. As set out in the Junction Design Report, in developing the design from Public Consultation 2 to Public Consultation 3, the alignment on Herbert Park was amended to reduce the impact on adjacent land and retain trees previously identified for removal. A further realignment of Herbert Park to the west was not considered possible as this would reintroduce a stagger to the junction removing the benefit to cyclist and pedestrian movement gained by the Proposed Scheme. For this reason the Proposed Scheme was identified as the most appropriate alignment in this area.

The submission notes that the railings and plinth at the plot boundary have heritage value. This has been assessed in Chapter 16 of the EIAR where section 16.4.3.5 states that the wrought iron gate, granite plinths and railings at the corner of Roly's Bistro, 7 Ballsbridge Terrace and Herbert Park Road and which were built as part of the park, will be repositioned as a result of a land take. There will also be a loss of trees which will impact the setting and the vista down Herbert Park. The railings and vista are of Regional Importance and Medium Sensitivity. The Magnitude of the impact is Medium. The potential Construction Phase impact is Direct, Negative, Moderate and Permanent.

DCC's submission has identified that the pergola structure is unauthorised. DCC have now granted a temporary street furniture licence for the pergola structure at Roly's Bistro until May 2023, it is anticipated that this structure will be removed at the end of the licence period in line with normal licencing conditions.

ii. Impact on Biodiversity

The addition of incorrect mapping of the newly constructed pergola is noted with regards to the habitat mapping at this location. This is classified as Buildings and Artificial Surfaces (BL3). BL3 is not considered a Key Ecological Receptor (KER) in the context of the EIAR, due to being largely devoid of flora and fauna, and the loss of this habitat does not warrant any changes to the impact assessment with respect to biodiversity.

The submission has correctly identified that bat activity surveys were not carried out at the corner of Roly's Bistro. As it was not feasible, practical or proportionate to survey the entirety of the Proposed Scheme, a desk study was carried out to identify suitable bat foraging and / or commuting habitat (e.g. woodland and mature treelines) for the focus of bat surveys. Following this, transect routes for bat activity surveys were designed within these areas to encompass a representative sample of the habitats present within the Proposed Scheme area. Bat activity collected at these locations are considered representative of bat activity across the length of the scheme owing to similar habitats and disturbance levels across the city. The impact assessment incorporated these findings when assessing potential impacts upon the local bat community.

As noted in the submission, the existing treeline outside the building will be partially removed as a result of the Proposed Scheme. In total 6 no. trees are proposed to be removed at this location. Walked surveys were carried out across the length of the Proposed Scheme, including this treeline, identifying the presence of potential roost features (PRFs) for bats, and assessing trees suitability for roosting bats in March 2022. Examples of PRFS include natural holes, cracks / splits in major limbs, loose bark, hollows / cavities. PRFs were not identified on any of the 6 no. trees outside Roly's Bistro, and therefore were not considered to have potential for roosting bat. This habitat was considered suitable for foraging and commuting bats, and as such the assessment of loss of this habitat was considered within the EIAR Biodiversity Chapter assessment of impacts on bats.

The impact assessment concluded that there will be a negative impact on bats arising from the loss of commuting and foraging habitat across the length of the Proposed Scheme. The scale of effects was assessed as significant at the local geographic scale. In the context of the overall assessment, the loss of 6 no. trees adjacent to Roly's Bistro is not significant. Ireland's bat species have an estimated core sustenance zone (CSZ) of between 1km and 4km from a roost, and the 6 no. trees represent a tiny fraction of any bat CSZ. Furthermore the existing environment at this location is highlight disturbed, with considerable existing lighting at night, thus reducing the suitability of this treeline to foraging bats (as bats tend to avoid heavily lit areas). Although offering a connecting habitat to the more suitable foraging habitat of Herbert Park, bats are more likely to forage within Herbert Park proper and the River Dodder to the south which contain large tracts of high-quality foraging habitat.

As such, the proposed removal of the 6 no. trees of the WL2 treeline and associated shrubs outside Roly's Bistro will not negatively affect the conservation status of any of Ireland's bat species. Furthermore the EIAR Biodiversity Chapter considers the effects of habitat loss in relation to bats, and is therefore not deficient in this regard.

4. Responses to Individual Submissions on the Proposed Scheme

4.1 01 – Ailesbury Road Resident’s Association

4.1.1 Submission – Ailesbury Road

This submission makes two observations relating to:

- i. Removal of left turn filter lane at the Ailesbury Road/Merrion Road junction and impact on traffic
- ii. Consider removal of restricted turn from Ailesbury Road onto Shrewsbury Road

4.1.2 Response to submission

- i. Removal of left turn slip lanes at the Ailesbury Road/Merrion Road junction and impact on traffic

“DMURS” is The Design Manual for Urban Roads and Streets (Government of Ireland 2013) and is the key design guidance relevant for the Proposed Scheme. Section 4.4.3 of DMURS relates to junction design and sets out how junction design is largely determined by volumes of traffic and while the design of junctions has traditionally prioritised motor vehicle movement, designers must take a more balanced approach to junction design in order to meet the objectives of Smarter Travel and DMURS.

Specifically, DMURS states that designers should, inter alia, “Omit left turn slips, which generally provide little extra effective vehicular capacity but are highly disruptive for pedestrians and cyclists. Where demand warrants, they may be replaced with left turning lanes with tighter corner radii”.

In addition, the NTA’s Draft GDA Transport Strategy (GDATS) 2022 – 2042 identifies a range of measures to achieve the aims of the Draft GDATS, as noted in Table 3.7 of Appendix A2.1 Planning Report of EIAR Chapter 2 Need for the Scheme. Measure WALK3 relates to Improved Junctions and sets out how the NTA, in conjunction with local authorities, will implement junction improvements across the GDA to, inter alia, enhance movement by pedestrians and cyclists via a programme of removal of slip lanes at appropriate locations, together with consideration of junction signalling changes to better balance the use of the junction between motorised and vulnerable modes.

It is clear from the above that the retention of the left turn slip lanes would be contrary to the requirements of DMURS. In relation to achieving the scheme objectives the removal of left turn slip lanes is essential to achieving the necessary enhanced pedestrian, cyclist and bus priority infrastructure.

- ii. Consider removal of restricted turn from Ailesbury Road onto Shrewsbury Road

The existing turn restriction at this location prohibits the left turn from Ailesbury Road onto Shrewsbury Road between the hours of 07:00 and 10:00 Mon-Sat. The extensive traffic modelling exercise undertaken as part of the Proposed Scheme assessment as presented in Chapter 6 of the EIAR has not identified the need for any offline traffic management measures in this area in order to facilitate the Proposed Scheme or mitigate anticipated impacts. As such, it is not proposed to remove this restriction.

4.2 02 – Aviva Life and Pensions Ireland DAC

4.2.1 Submission

This submission raises one potential issue:

- i. Impact on access to Blackrock Village Centre during construction and operation of the Proposed Scheme

The submissions sets out concerns around the impact of the proposed scheme on vehicular access to Blackrock Village Centre during the operation of the scheme. A suggestion is made to reverse the one way-system on Rock Hill Road to improve access from the south west.

Concern is also raised around the impact on vehicular access to Blackrock Village Centre during construction.

4.2.2 Response to submission

- i. Impact on access to Blackrock Village Centre during construction and operation of the Proposed Scheme

In terms of the impact during the operation of the scheme, the extensive traffic modelling exercise undertaken as part of the Proposed Scheme assessment as presented in Chapter 6 of the EIAR has not identified the need for any offline traffic management measures in this area in order to facilitate the Proposed Scheme or mitigate anticipated impacts. The Junction Design Report included in Appendix A6.3 presents the junction assessment results at the Rock Road / Rock Hill junction where it is demonstrated that the junction will operate within capacity in 2028 in each peak period. As such, it is not proposed to reverse the one-way system currently in place along Rock Hill Road.

In terms of impact on access during construction, it is acknowledged that during the works there will be inconveniences for all users but this will be managed to minimise impacts for all affected parties. The duration of the works will vary from property to property, but access and egress will be maintained at all times. As described in paragraph 5.5.3.2 of Chapter 5 Construction of Volume 2 of the EIAR, details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area.

The submission notes specific concerns around increased congestion during construction and the potential to impede access to Blackrock Village Centre. As noted above there will be inconveniences during the works which will be managed to minimise impacts. As noted in section 6.5.1 of Chapter 6 of the EIAR, a detailed Construction Traffic Management Plan will be prepared, and subsequently implemented, by the appointed contractor prior to construction, including Temporary Traffic Management arrangements prepared in accordance with Department of Transport's 'Traffic Signs Manual, Chapter 8 Temporary Traffic Measures and Signs for Roadworks'. The CTMP will be consulted upon with the road authority and will include measures to minimise the impacts associated with the Construction Phase upon the peak periods of the day. It will include imbedded mitigation measures which will assist to alleviate any negative impact as a result of the Construction Phase of the Proposed Scheme. The appointed contractor will also prepare a Construction Stage Mobility Management Plan (CSMMP) which will be developed prior to construction, as described in the CEMP, to actively encourage personnel to travel to site by sustainable means.

Furthermore as set out in section 5.1.6 of Appendix A5.1 of the EIAR, the appointed contractor will put in place a Communications Plan in accordance with the Employer's Requirements. The Plan will provide a mechanism for members of the public to communicate with the NTA and the appointed contractor, and for the NTA and the appointed contractor to communicate important information on various aspects of the Proposed Scheme to the public. The Plan will include procedures to inform members of the community directly affected by the

Construction Phase on schedules for any activity of a particularly disruptive nature which is likely to impinge on their property such as boundary works, road closures and diversions, and any mitigating actions that are being taken to minimise such disruption.

4.3 03 – Bailey J W

4.3.1 Submission – Pembroke Road

The submission notes that the authors are residents of Saint Mary's Road and wish to support the objection of the Pembroke Road Association to the Proposed Scheme.

4.3.2 Response to submission

The NTA notes the support of this submission for objections raised by the Pembroke Road Association. Detailed responses to the issues raised by the Pembroke Road Association have been provided in Section 2.2.3 of this report.

4.4 04 – Blackrock Clinic

4.4.1 Submission – Blackrock Clinic

This objection to the CPO raises six potential issues:

- i. The extent of CPO is considered to be excessive and will have significant impact on the operation of the Clinic.

The submission states that the proposed land take is excessive and in their view unnecessary to deliver BusConnects. In terms of the impact on Glenalla and Seafort Buildings (plot reference 1020(1)1i and 1020(2).2i) it is submitted that the proposal will result in the loss of approximately seven parking spaces as well as complete inaccessibility of the Glenalla buildings during construction, suggesting that the building would be unusable for the duration of the works. An opinion is offered to the quantum of permanent and temporary land take required to deliver the scheme which is less than that proposed in the Proposed Scheme documents.

In relation to impact on Blackrock Clinic (plot reference 1019(1)1i, 1019(2)2i and 1019(3).3i), it is submitted that the temporary land take would result in the loss of in excess of 40 car parking spaces which in their view is not required to facilitate the scheme. The permanent loss of car parking is also quantified as being approximately ten spaces where it is noted that significant reconfiguration of the affected parking areas is required. An opinion is offered to the quantum of permanent and temporary land take required to deliver the scheme which is less than that proposed in the Proposed Scheme documents and a suggestion is made that the proposed cross-section can be reduced to minimise the impact on Blackrock Clinic lands. It is also submitted that the extent of CPO at the access junction to incorporate signal equipment is not required.

It is requested that a condition is attached to any approval removing the excess land from the CPO.

- ii. Impact on access during construction

The submission states that during construction the operation of the existing main access will be severely impacted suggesting that an alternative access would be required to facilitate the works and that this would still not adequately cater for the operation requirements of Blackrock Clinic. It is submitted that the operation of the junction during construction would result in an impact on access to the facility for patients, visitors, service and emergency vehicles as a result of increased congestion.

It is further noted that the only pedestrian access to Blackrock Clinic will be impacted by the temporary works resulting in an unsafe environment for vulnerable road users.

- iii. The BusConnects scheme has not taken cognisance of the proposed relocation of the entrance to Blackrock Clinic nor the future expansion.

It is noted in the submission that Blackrock Clinic currently have two planning applications being processed which are both similar and propose a relocation of the proposed entrance to an alternative location further south.

It is submitted that the proposed relocated entrance would reduce the requirement for CPO from Blackrock Clinic while still facilitating the BusConnects proposals. It is noted that the NTA met with representatives of Blackrock Clinic to discuss these proposals.

It is submitted that should an approval for the proposed scheme be forthcoming, that a condition is attached requiring the BusConnects design to comply with the drawings submitted with the submission resulting in reduced land acquisition.

- iv. Removal of trees and established boundaries

It is submitted that the proposed scheme will result in the removal of several mature trees within the Blackrock Clinic site. It is noted that the scale of the impact could be reduced by reducing land take as set out in item i.

- v. Impact on Utilities and Services

The submission states that the proposed scheme has the potential to impact on services to the site during construction both in terms of planned or unplanned disruptions. It is requested that all works to utilities, especially any potential disruption to utilities, is discussed with Blackrock Clinic in advance and that contingency plan is agreed before such works commences.

- vi. Incorrect Dun Laoghaire Rathdown Development Plan

The submission states the proposed scheme application does not reflect the recently adopted Dun Laoghaire Rathdown Development Plan 2022 -2028 and in particular does not reflect changes to zoning the Blackrock Clinic lands.

4.4.2 Response to submission

This submission was also made in response to the CPO relating to the proposed acquisition of land from the premises. Detailed responses to the issues raised have been provided in Section 3.2.2 of this report.

4.5 05 – Bowles Michael P.

4.5.1 Submission – Baggot Street

This submission objects to the proposed Scheme and raises the following issues which relate to Baggot Street Upper:

- i. Potential negative impact on businesses due to the removal of parking spaces; and.
- ii. Reduced need for public transport due to the pandemic.

4.5.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.3.3 of this report.

4.6 06 – Bowles Patrick

4.6.1 Submission – Baggot Street

This submission objects to the proposed Scheme and raises the following issues which relate to Baggot Street Upper:

- i. Potential negative impact on businesses due to the removal of parking spaces; and.
- ii. Reduced need for public transport due to the pandemic.

4.6.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.3.3 of this report.

4.7 07 – Bradly David and Cooney Marie-Therese

4.7.1 Submission – Nutley Lane

This submission objected the proposals at Nutley Park and raised the following issues:

- i. Access to Property
- ii. Safety implications due to the alignment of two-way cycle track
- iii. Increase noise and air pollution
- iv. Removal of trees / hedges and environmental impacts.

4.7.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.8 08 – Brereton Hilda and Brian P.

4.8.1 Submission – Nutley Lane

This submission objected the proposals at Nutley Lane and raised the following issues:

- i. Need for the link through Nutley Lane
- ii. Loss of greenery
- iii. Increase in air and noise pollution
- iv. Removal of footpath at Elm Park
- v. Removal of on-street parking
- vi. Increase in traffic congestion as result of the Proposed Scheme and the new Maternity Hospital
- vii. Alignment of the two-way cycle track and adverse impact to property access

4.8.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report

4.9 09 – Brophy David

4.9.1 Submission – Nutley Lane

This submission objects to certain aspects of the proposals at Nutley Lane and raised the following issues:

- i. Need for the link through Nutley Lane;
- ii. Removal of trees / hedges and environmental impact;
- iii. Inadequate Level of Service for pedestrian due to removal of footpath adjacent to Elm Park;
- iv. Increase in air and noise pollution;
- v. Removal of on-street parking and the adverse consequences to property access and congestion on side roads off Nutley Lane;
- vi. Scheme does nothing to relieve existing congestion levels, which will be exacerbated by the new maternity hospital; and
- vii. Impact on Elm Park Golf and Sports Club.
- viii. Loss of trees and hedges

4.9.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.10 10 – Byrne Liam and Mary and Others

4.10.1 Submission – Nutley Lane

This submission objected the proposals at Nutley Lane and raised the following issues:

- i. Need for the link through Nutley Lane
- ii. Damage to residential nature
- iii. Increase in air and noise pollution
- iv. Removal of on-street parking
- v. Impact on Elm Park Golf and Sports Club
- vi. Loss of trees and hedges

4.10.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report

4.11 11 – Byrne Patrick

This submission makes a number of observations and suggestions for proposals at Ballsbridge:

- i. Location of proposed toucan crossing in vicinity of Beattys Lane

The submission states the proposed location of the toucan crossing does not accommodate desire lines coming from Beatty's Lane.

- ii. Relocation of car parking for mobility impaired drivers

The submission states that the relocation of the parking space for mobility impaired drivers from outside Life Pharmacy to outside Crowes pub

4.11.1 Response to submission

- i. Location of pedestrian crossing in the vicinity of Beatty's Lane

At present there are currently 2 pedestrian crossing points provided in this area, one on the eastern approach of Merrion Road to the junction with Ballsbridge Park, and one on the western approach of Merrion Road to the junction with Shelbourne Road. These are located c. 200m apart. The Proposed Scheme proposes two further crossing locations within this 200m stretch significantly enhancing pedestrian and cycle safety.

The location of the proposed toucan crossing in the vicinity of Beatty's Lane has been carefully selected to integrate the Dodder Greenway with the Proposed Scheme in the most appropriate manner while accommodating desire lines within this area. It is noted that this proposal has been developed in consultation with the Dodder Greenway team in DCC to ensure both schemes are fully integrated.

It is noted that an alternative crossing location is suggested which would place the crossing to the west of Beatty's Lane. The submission states that this location would better accommodate the desire line for pedestrians coming from Beattys Lane to Herbert Park Lane which is noted as the typical path taken by pedestrians. It is noted that this proposal would not be possible owing to space constraints on Balls Bridge.

However, it is considered that the inclusion of the crossing as proposed, in combination with the other new proposed crossing of Merrion Road on the eastern approach to the junction of Shelbourne Road, would represent an adequate provision for pedestrians and a serve as a significant improvement over existing conditions.

- ii. Relocation of car parking for mobility impaired drivers

In order to facilitate the proposed toucan crossing location, it is necessary to relocate the existing parking space for mobility impaired drivers currently located immediately outside Life Pharmacy, to outside Crowes Pub. This represents a relocation of c.18m. Given the parking space serves all business in this area, it is not considered to be a major diversion from the current situation. It is further noted that as part of the Proposed Scheme, the parking bay will be upgraded to incorporate a dropped kerb better facilitating access from the bay to the footpath.

4.12 12 – Calvert John and Emma

4.12.1 Submission – Nutley Lane

This submission objected the proposals at Nutley Lane and raised the following issues:

- i. Changes to road layout and bus frequencies resulting in hazards for vulnerable road users

- ii. Need for the link through Nutley Lane
- iii. Increase in air and noise pollution
- iv. Loss of trees and hedges

4.12.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report

4.13 13 – Cavanagh Maurice

4.13.1 Submission – Pembroke Road

This submission objects to the proposal to route the Proposed Scheme along Pembroke Road and Baggot Street Upper. It raises the following issues:

- i. The appropriateness of Pembroke Road as a bus route due to its Georgian heritage;
- ii. Safety concerns for pedestrians and cyclists due to buses, specifically referencing large crowds at the Aviva stadium;
- iii. The appropriateness of MacCartin bridge for a bus corridor;
- iv. Reduction in air quality due to the Proposed Scheme;
- v. If pedestrian crossings are installed this would slow the progress of buses;
- vi. The Proposed Scheme would impact on the village function of Baggot Street Upper, including outdoor dining;
- vii. Lack of proposed pedestrian crossings on Pembroke Road;
- viii. Negative impact for businesses on Baggot Street Upper;
- ix. Need for the Proposed Scheme due to new working patterns;
- x. The Proposed Scheme should be routed via Mount Street and Northumberland Road;
- xi. Objects to the removal of parking on Pembroke Road

4.13.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.2.3 of this report.

4.14 14 – Collins Breda

4.14.1 Submission – Nutley Lane

This submission objected the proposals at Nutley Lane and raised the following issues:

- i. Additional lanes and bus traffic will negatively impact the community and residential nature
- ii. Removal of on-street parking and the adverse consequences to property access and congestion on side roads off Nutley Lane
- iii. Traffic Management Plan for greater Nutley area

- iv. Scheme does nothing to relieve existing congestion levels, which will be exacerbated by the new maternity hospital;
- v. Clarifications on the Environmental Impact Assessment Report;
- vi. Removal of trees and hedges and impact to environment
- vii. Increase in air and noise pollution
- viii. Impact on the amenities of properties of properties during construction
- ix. Property values
- x. Two-way cycle track alignment and adverse impact to property access
- xi. Changes to commuting patterns post Covid-19

4.14.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.15 15 – Comaskey Anthony and Others

4.15.1 Submission – Baggot Street Upper

The submission objects to the Proposed Scheme. The submission raises the following issues:

- i. The removal of parking and loading will have a detrimental impact on businesses;
- ii. The proposed scheme will have a negative impact on the heritage of the neighbourhood and the local community; and
- iii. Alternative plans should be considered, such as the Newton Plan.

4.15.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.3.3 of this report.

4.16 16 – Conroy Patricia

4.16.1 Submission – Baggot Street Upper

This submission objects to the proposed Scheme and raises the following issues which relate to Baggot Street Upper:

- i. Potential negative impact on businesses due to the removal of parking spaces; and.
- ii. Reduced need for public transport due to the pandemic.

4.16.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.3.3 of this report.

4.17 17 – Corcoran Declan

4.17.1 Submission – Nutley Lane

This submission objected the proposals at Nutley Lane and raised the following issues:

- i. Need for the link
- ii. Consideration of alternatives; buses are becoming outdated and cannot accommodate the same level of passengers as trams

4.17.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.1.4 of this report.

4.18 18 – Cotter Colette

4.18.1 Submission – George’s Avenue

This submission objects to certain aspects of the proposals at George’s Avenue and raises the following issues:

- i. Need for traffic restrictions from George’s Avenue onto Frascati Road; and
- ii. Traffic complications due to the proposed restrictions.

4.18.2 Response to submission

- i. Traffic restrictions from George’s Avenue onto Frascati Road

During the development of the Proposed Scheme design, traffic modelling was undertaken in parallel to identify potential implications arising from the proposals and allow the design to be refined to mitigate any potential impacts. The modelling carried out is set out in Chapter 6 of the EIAR. The modelling predicted traffic volumes along the corridor and surrounding roads and these traffic volumes were then examined by environmental specialists to assess the impacts of changes in traffic volumes on roads.

When the LAM of the proposed scheme was run, the Annual Average Daily Traffic (AADT) volumes were provided to the Air and Noise specialists. These specialists carried out air and noise modelling of the scheme to identify any locations where an unacceptable deterioration in air quality or noise volumes may occur.

This assessment identified that, as a result of the scheme, additional traffic would be attracted onto George’s Avenue, between Anglesea Avenue and Frascati Road. This was observed to be traffic which would traditionally travel down Carysfort Avenue and turn left onto the Frascati Road but was now seen to divert onto Anglesea Avenue and then to George’s Avenue before turning left onto Frascati Road. This diversion was assessed in terms of air quality and noise impacts and a predicted negative noise impact classified as Moderate - Significant in the short term was identified. In order to mitigate against this, alternative proposals were considered.

While a number of potential mitigation measures were considered, including the full signalisation of the Frascati Road and George’s Avenue junction, the restriction of traffic exiting from George’s Avenue onto Frascati Road was identified as the preferred solution to deter traffic from diverting to George’s Avenue from Carysfort Avenue.

To prevent rat-running traffic from travelling along George's Avenue, it is proposed to restrict the egress from George's Avenue onto Frascati Road, creating a cul-de-sac at the northern end of George's Avenue (to the south of Frascati Road). This road will still be accessible to residents and visitors from Frascati Park, Sydney Avenue, Anglesea Avenue and Avoca Place as is currently the case, however, those exiting George's Avenue would now also exit the street via one of these streets. This will have the effect of removing all through traffic from the street and maintaining access to local traffic only.

George's Avenue, however, is a narrow street, which will require occasional access for larger vehicles such as refuse trucks, oil deliveries etc. There is limited space available to provide a turning bay for larger vehicles at the northern end of George's Avenue. Therefore, it is proposed that egress for authorised vehicles only will be provided from George's Avenue onto Frascati Road.

Notwithstanding the primary reason for the proposals outlined above, the proposed arrangement provides significantly improved facilities for pedestrians and cyclists at this location. This is reflected in Chapter 6 of the EIAR where the pedestrian level of service increases from Level of Service (LoS) C to LoS B at the Frascati Road / George's Avenue junction (see table 6.24 of the EIAR) and the cyclist level of service increases from LoS B to LoS A (see table 6.25 of the EIAR).

ii. Traffic rerouting due to the proposed restrictions.

The submission notes that the alternative routes available are not suitable for traffic rerouting from George's Avenue as a result of the proposed restrictions.

However, it is considered that there is adequate permeability within the local road network to accommodate traffic rerouting as a result of the restriction. These routes are summarised below:

- Route via Frascati Park and Mount Merrion Avenue. A yellow box provided on Mount Merrion Avenue to assist with vehicles exiting from Frascati Park.
- Route via Sydney Avenue and Mount Merrion Avenue. The presence of a pedestrian crossing to the east of Sydney Avenue combined with the provision of a yellow box will assist with vehicles exiting from Sydney Avenue.
- Route via Avoca Place, Convent Road and Carysfort Avenue.

In terms of the suitability of these routes, it is considered that given the low volumes of traffic in the area, as well as the 30kph speed limit, that these routes are adequate to facilitate the rerouting of traffic as a result of the Proposed Scheme.

It is noted that the traffic assessment of the proposed scheme, which is presented in Chapter 6 of the EIAR, did not identify any of the routes mentioned above as being significantly impacted as a result of the proposed changes.

4.19 19 – Coughlan Anthony

4.19.1 Submission – Pembroke Road

This submission objected the proposals at Pembroke Road and raises the following issues:

- i. Obsolete traffic data due to shift in commuter patterns from Covid 19;
- ii. Consideration of alternative routes;
- iii. Safety implications from the proposed parking protected cycle track;
- iv. Removal of on-street parking;

- v. Lack of pedestrian crossing; and
- vi. Compulsory Purchase Order.

4.19.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in of this report.

- i. Obsolete traffic data due to shift in commuter patters from Covid 19;

The following is noted in Section 2.1 of Chapter 2 of the EIAR, in relation to the effect of COVID-19:

“The COVID-19 pandemic brought about a short-term change in travel patterns in the Greater Dublin Area (which led, for example, to fewer people using public transport and more people working from home). Travel demand and patterns of travel have now started to return to pre-pandemic levels and are anticipated to grow in line with population growth. The impacts on travel demand and patterns of travel are still dependent on the quality of the transport system, in particular the reliability of a bus service that is not constrained by general traffic congestion.”

Chapter 06 (Traffic & Transport) of the EIAR has considered the potential traffic & transport impacts associated with the Construction and Operational Phases of the Belfield / Blackrock to City Centre Core Bus Corridor Scheme. Section 6.4.6.2.8.1 of this document has addressed the flexibility in working arrangements brought on following COVID – 19 and states:

‘The Proposed Scheme aims to provide an attractive alternative to the private car and promote a modal shift to public transport, walking and cycling. It is, however, recognised that there will be an overall reduction in operational capacity for general traffic along the direct study area given the proposed changes to the road layout and the rebalancing of priority to walking, cycling and bus. This reduction in operational capacity for general traffic along the Proposed Scheme will likely create some level of trip redistribution onto the surrounding road network.

It should be noted that the Do Minimum and Do Something scenarios are based on the assumption that travel behaviour will remain broadly consistent over time and that car demand, used for this assessment, represents a reasonable worst-case scenario. It is possible that societal trends in the medium to long term may reduce car demand further due to ongoing changes to travel behaviours and further shifts towards sustainable travel, flexibility in working arrangements brought on following COVID – 19, and delayed car ownership trends that are emerging.’

In summary it is considered that the traffic assessment contained in the EIAR, and the traffic data upon which it is based (collected pre-covid pandemic), represents a reasonable basis for the assessment.

- ii. Consideration of alternative routes;

A detailed response to this issue has been provided in Section 2.2.3 of this report.

- iii. Safety implications from the proposed parking protected cycle track;

Section 6 of Appendix A4.1 BusConnects Preliminary Design Guidance Booklet (PDGB) of the EIAR sets out the guidance for the design of parking and loading bays. In this section, parking protected cycle tracks are identified as the preferred layout for provision of cycle facilities adjacent on-street car parking as it affords the most physical protection from passing traffic. It is noted that this arrangement includes a 0.75m buffer between the edge of the parking bay and the edge of the cycle track to facilitate an open door as well as provide some space for car passengers entering/exiting vehicles.

iv. Removal of on-street parking;

A detailed response to this issue has been provided in Section 2.2.3 of this report.

v. Lack of pedestrian crossing

The proposed scheme includes controlled pedestrian facilities at the junction of Pembroke Road/Northumberland Road and at the Pembroke Road/Waterloo Road junctions. These are located approximately 500m from each other. However, the proposed bus gate will significantly reduce traffic flows along Pembroke Road to a level that allows safer movement of pedestrians across Pembroke Road without the need for a controlled pedestrian crossing. For this reason, no additional controlled pedestrian crossings were proposed along Pembroke Road but uncontrolled pedestrian crossings can be retained close to where they currently exist.

vi. Compulsory Purchase Order.

The submission queries the temporary CPO at 1-11 Pembroke Road and suggests that felling of trees will be necessary. This arrangement at 1-11 Pembroke has been agreed with the relevant land owners at 1 and at 11 Pembroke Road including the introduction of control at the access gate to 11 Pembroke Road. There will be no felling of trees to enable the Proposed Scheme to be implemented at 1-11 Pembroke Road.

4.20 20 – Cllr Marie Baker

4.20.1 Submission – George’s Avenue

- i. Traffic restrictions from George’s Avenue onto Frascati Road; and
- ii. Traffic rerouting due to the proposed restrictions.

4.20.2 Response to submission

- i. Traffic restrictions from George’s Avenue onto Frascati Road

During the development of the Proposed Scheme design, traffic modelling was undertaken in parallel to identify potential implications arising from the proposals and allow the design to be refined to mitigate any potential impacts. The modelling carried out is set out in Chapter 6 of the EIAR. The modelling predicted traffic volumes along the corridor and surrounding roads and these traffic volumes were then examined by environmental specialists to assess the impacts of changes in traffic volumes on roads.

When the LAM of the proposed scheme was run, the Annual Average Daily Traffic (AADT) volumes were provided to the Air and Noise specialists. These specialists carried out air and noise modelling of the scheme to identify any locations where an unacceptable deterioration in air quality or noise volumes may occur.

This assessment identified that, as a result of the scheme, additional traffic would be attracted onto George’s Avenue, between Anglesea Avenue and Frascati Road. This was observed to be traffic which would traditionally travel down Carysfort Avenue and turn left onto the Frascati Road but was now seen to divert onto Anglesea Avenue and then to George’s Avenue before turning left onto Frascati Road. This diversion was assessed in terms of air quality and noise impacts and a predicted negative noise impact classified as Moderate - Significant in the short term was identified. In order to mitigate against this, alternative proposals were considered.

While a number of potential mitigation measures were considered, including the full signalisation of the Frascati Road and George's Avenue junction, the restriction of traffic exiting from George's Avenue onto Frascati Road was identified as the preferred solution to deter traffic diverting to George's Avenue from Carysfort Avenue.

To prevent rat-running traffic from travelling along George's Avenue, it is proposed to close the exit from George's Avenue onto Frascati Road, creating a cul-de-sac at the northern end of George's Avenue (to the south of Frascati Road). This road will still be accessible to residents and visitors from Frascati Park, Sydney Avenue, Anglesea Avenue and Avoca Place as is currently the case, however, those exiting George's Avenue would now also exit the street via one of these streets. This will have the effect of removing all through traffic from the street and maintaining access to local traffic only.

George's Avenue, however, is a narrow street, which will require occasional access for larger vehicles such as refuse trucks, oil deliveries etc. There is limited space available to provide a turning bay for larger vehicles at the northern end of George's Avenue. Therefore, it is proposed that a controlled exit, for authorised vehicles only, will be provided from George's Avenue onto Frascati Road.

The proposed exit will be controlled by retractable bollards in the carriageway of the left turn from George's Avenue to Frascati Road. These bollards will be spaced apart so that cars will not be able to pass through them, however cyclists and pedestrians will be able to pass through.

Notwithstanding the primary reason for the proposals outlined above, the proposed arrangement provides significantly improved facilities for pedestrians and cyclists at this location. This is reflected in Chapter 6 of the EIAR where the pedestrian level of service increases from LoS C to LoS B at the Frascati Road / George's Avenue junction (see table 6.24 of the EIAR) and the cyclist level of service increases from LoS B to LoS A (see table 6.25 of the EIAR).

ii. Traffic rerouting due to the proposed restrictions.

The submission notes that the alternative routes available are not suitable for traffic rerouting from George's Avenue as a result of the proposed restrictions.

However, it is considered that there is adequate permeability within the local road network to accommodate traffic rerouting as a result of the restriction. These routes are summarised below:

- Route via Frascati Park and Mount Merrion Avenue. A yellow box provided on Mount Merrion Avenue to assist with vehicles exiting from Frascati Park.
- Route via Sydney Avenue and Mount Merrion Avenue. The presence of a pedestrian crossing to the east of Sydney Avenue combined with the provision of a yellow box will assist with vehicles exiting from Sydney Avenue.
- Route via Avoca Place, Convent Road and Carysfort Avenue.

In terms of the suitability of these routes, it is considered that given the low volumes of traffic in the area, as well as the 30kph speed limit, that these routes are adequate to facilitate the rerouting of traffic as a result of the Proposed Scheme.

It is noted that the traffic assessment of the Proposed Scheme, which is presented in Chapter 6 of the EIAR, did not identify any of the routes mentioned above as being significantly impacted as a result of the proposed changes.

4.21 21 – Dalata Hotel Group Plc

4.21.1 Overview of Submission

The submission is made by Coakley O'Neill Town Planning Ltd. on behalf of Dalata Hotel Group Plc. The submission notes that Dalata Hotel Group Plc. are very supportive of any scheme that promotes more sustainable forms of transport within Dublin City, which will alleviate pressure placed on the road network by private cars. The submission goes on to note however that Dalata Hotel Group Plc cannot fully support the Proposed Scheme in its current iteration due to the impacts which the Proposed Scheme has on the Clayton Hotel Ballsbridge.

The submission goes on to outline the location of the Clayton Hotel, its current operation and the history of the building, as well as to outline the relevant planning history and local planning policy of the site. The submission notes that the property is identified on the Council Register of Record of Protected Structures (reference 5089). The submission notes the guidance and objectives within the Dublin City Council Development plan with respect to such protected structures and highlights that the Development Plan makes specific reference to the curtilage of Protected Structures.

The submission goes on to outline concerns in relation to potential negative impacts on the Clayton Hotel, due to the proposed permanent and temporary land acquisition proposed. The submission notes the concerns of the property owners in relation to the proposed works to the front of their property, as well as in relation to the proposed CPO of their lands. The submission notes that the protected status of the property extends to the overall curtilage of the site, and as such the preservation of the sites external gardens and boundary fencing carries the same importance as that of the existing buildings. It is noted that the landscaped gardens form a unique and important setting and are visible on the Historic 25" map extract. It is also noted that the hotel building is purposefully set back from the R118 Merrion Road with a large buffer to the hotel from traffic.

The submission asserts that the CPO as submitted, would seriously injure the overall built heritage of the site as a whole. It goes further to state that the Proposed Scheme runs contrary to the Guidelines for Planning Authorities on Architectural Heritage Protection and the policies and the relevant objectives within the Dublin City Development Plan and will have an undue negative impact on the Protected Structure. The submission further asserts that the exclusion of this element of the Proposed Scheme would have no material effect on the benefits of the Proposed Scheme.

4.21.2 Response to submission

This submission was also made in response to the CPO relating to the proposed acquisition of land from the premises. Detailed responses to the issues raised have been provided in Section 3.2.6 of this report.

4.22 22 – Deane James

4.22.1 Submission – Baggot Street Upper

This submission objects to the proposed changes to be made to Haddington Road and Upper Baggot Street as part of the Proposed Scheme. The submission highlights the following issues:

- i. The Proposed Scheme will make their business, a car garage, less accessible by car;
- ii. The Proposed Scheme will lead to traffic congestion;
- iii. The routing of the Proposed Scheme should be along Northumberland Road;
- iv. Removal of parking and loading will be detrimental to businesses and residents; and
- v. The Proposed Scheme will ruin the beautiful Victorian and Georgian streetscape.

4.22.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.3.3 of this report.

4.23 23 – Dee Marion

4.23.1 Submission – Nutley Lane

This submission objected the proposals at Nutley Lane and raised the following issues:

- i. Access to property;
- ii. Removal of trees and impact to environment;
- iii. Property values;
- iv. Removal of on-street parking;
- v. Additional traffic; and
- vi. Increase in air pollution.

4.23.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.1.3 of this report.

4.24 24 – Development Applications Unit

4.24.1 Summary of Submission

The submission outlines heritage related observations/recommendations under the heading of Nature Conservation. The submission notes that the Department's primary concern relates to the potential for pollutants arising from the Construction Stage of the Proposed Scheme having detrimental effects on the Williamstown Creek and Booterstown Marsh of the South Dublin Bay and River Tolka Estuary Special Protection Area (SPA), and the loss of treeline, hedgerows, mixed broadleaved woodlands and scattered trees and parkland habitat along sections of the Proposed Scheme.

The submission refers to the proposal to locate the Construction Compound in the Booterstown Carpark in Blackrock Park. The submission notes that this area lies beside the outlet to Dublin Bay from Williamstown Creek into Booterstown Marsh, both of which are of conservation significance for wintering Special Conservation Interest (SCI) bird species. It is noted that should pollutants enter Dublin Bay through this mechanism, that they could also detrimentally affect SCI bird species in the wider South Dublin Bay and River Tolka Estuary SPA. The submission also notes that the construction of the Proposed Scheme along the Rock Road adjacent to Booterstown Marsh could result in pollution of the marsh with impacts on the SCI bird species and their habitats there.

The submission acknowledges that the Natura Impact Statement (NIS) prepared as part of the application recognises the potential for pollution arising from aforementioned sources, and that various appropriate measures to prevent any pollution arising from the compound or other works associated with the Proposed Scheme are set out in the NIS, the Construction Environmental Management Plan (CEMP), and the Surface Water Management Plan (SWMP) submitted. It is also acknowledges that an Environment Response Incident Response Plan has been prepared to provide mitigation of any accidental spillages. The submission states that if these plans are fully adhered to that any detrimental effect to the SAC should be successfully avoided.

The submission further refers to the proposal to remove 1040m of hedgerows and 4157m of treeline comprising 329 trees as part of the Proposed Scheme, in particular along the boundaries of Blackrock Park and Blackrock College on the Rock Road, and the boundaries of Elm Park Golf Club and RTÉ grounds on Nutley Lane. It is noted that these trees are not of national conservation significance but can be considered of local importance and that the resulting biodiversity loss must be considered.

The submission makes 2 recommendations:

- I. That the measures proposed to avoid detrimental effects on the South Dublin Bay and River Tolka Estuary SPA and South Dublin Bay SAC arising from the development of the proposed bus corridor set out in the NIS, CEMP and SWMP submitted in support of the present application shall be implemented in full.

Reason: To avoid the proposed bus corridor detrimentally affecting SCI bird species and Qualifying Habitats for which the South Dublin Bay European sites are designated under the Birds and Habitats Directives.

- II. That no removal of trees or vegetation shall occur during the main bird breeding season from March to August inclusive.

Reason: To avoid the destruction of bird nests, eggs and nestlings.

Finally, the submission recommends that in the interest of protecting local biodiversity, the applicant should be required to review the proposed removal of trees and hedgerows as part of the Proposed Scheme, to determine whether such removals are necessary and in the case of large mature specimen trees is found to be necessary, it should be considered, where feasible, transplanting such trees to sites immediately adjacent to the present locations.

4.24.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.4.6.

4.25 25 – Dineen Mark and Mary

4.25.1 Submission – Baggot Street Upper

This submission objects to the Proposed Scheme and highlights the following issues:

- i. The routing of the Proposed Scheme along Pembroke Road and Baggot Street Upper;
- ii. The proposed Bus Gate and bus priority signal on Pembroke Road;
- iii. Impacts on businesses due to the removal of parking on Baggot Street Upper; and
- iv. The need for the Proposed Scheme due to changing travel patterns due to working from home.

4.25.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.3.3 of this report.

4.26 26 – Dorman John and Others

4.26.1 Submission – Pembroke Road

This submission objected the proposals at Pembroke Road and raises the following issues:

- i. Alteration of railing and plinths outside No. 1-11 Pembroke Road;

- ii. No Architectural Heritage Impact Assessment; and
- iii. Insufficient information for An Bord Pleanála to appropriately assess the impact on protected structures.

4.26.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.2.3 of this report.

4.27 27 – Doyle Stephen

4.27.1 Submission – Pembroke Road

This submission objected the proposals at Pembroke Road and raises the following issues:

- I. Impact to traders.

4.27.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.2.3 of this report.

4.28 28 – Dublin City Council

4.28.1 Submission – Whole Scheme

Dublin City Council's (DCC) submission comprises 37 pages and is sectionalised numerically. For ease of reference the DCC section numbering and sub-section numbering conventions have been retained throughout the NTA's response as set out in the following paragraphs.

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

- Role of NTA & Liaison
- DCC's Support for the Scheme
- Certain Observations Raised/Clarification Sought by DCC
- C1 – Response to Section 2.1 Relevant Planning History
- C2 – Response to Section 2.2 Policy Context
- C3 – Response to Section 2.3 Departmental Reports, including reference to the Appendix
- C4 – Response to Section 2.4 Planning Assessment (sub-sections 2.4.1 to 2.4.12)
- C5 – Response to Section 2.6 Conclusion
- C6 – Response to Appendix to DCC Submission

4.28.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.4.7 of this report.

4.29 29 – Dublin Commuter Coalition

4.29.1 Submission – Whole Scheme

This submission raised the following issues:

- i. Advocate for the Proposed Scheme;
- ii. Enforcement;
- iii. Junction Design;
- iv. Pedestrian Crossings;
- v. Shared Space;
- vi. Bus Stop Design;
- vii. Bus Stop Locations;
- viii. Parking Spaces;
- ix. Nutley Lane;
- x. Minor Junctions; and
- xi. Yellow Boxes

4.29.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.4.4 of this report.

4.30 30 – Dublin Cycling Campaign

4.30.1 Submission – Whole Scheme

This submission raised the following issues:

- i. Advocate for the Proposed Scheme;
- ii. Cycling for all ages and abilities;
- iii. Existing Cycling Conditions;
- iv. Welcome Improvements;
- v. Requested Modifications;
 - a. Width of cycle track;
 - b. Shared Walking and Cycling Spaces and Crossings;
 - c. Right Turn Movements;
 - d. Other Modifications; and
 - e. Connections beyond the scheme.
- vi. Junction Design;
- vii. Location Specific Comments;

- a. Newtown Avenue and Entrance to St. Vincent's Park;
- b. Nutley Lane;
- c. Ballsbridge; and
- d. Baggot Street Upper.

4.30.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.4.5 of this report.

4.31 31 – Dún Laoghaire-Rathdown County Council

4.31.1 Submission – Whole Scheme

Dún Laoghaire-Rathdown County Council's (DLR) submission comprises 26 pages and is sectionalised numerically. For ease of reference, the DLR section numbering and sub-section numbering conventions have been retained throughout the NTA's response as set out in the following paragraphs. The issues raised are broadly categorised as follows:

- Section 1 – Introduction and Planning Policy
- Section 2 – Traffic and Active Travel recommendations
- Section 3 – Landscape, Public Realm and Architectural Conservation recommendations
- Section 4 – Environment and Biodiversity Recommendations
- Section 5 – Drainage, Road Maintenance, Public Lighting and Pollution Control Recommendations.

4.31.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.4.2 of this report.

4.32 32 – Dunne Geraldine

4.32.1 Submission – Baggot Street Upper

This submission objects to the Proposed Scheme proposals in the Baggot Street area. The submission raises the following issues:

- i. Impact on businesses due to the removal of parking and loading;
- ii. Vulnerable Road users would be affected in crossing the road;
- iii. The need for enhanced bus services on this route;
- iv. The routing of the Proposed Scheme along Pembroke Road and Baggot Street, Baggot Street Bridge is noted as a particular constraint;
- v. The proposal to restrict the right turn onto Baggot Street from Mespil Road will be harmful to business as customers and staff will not be able to drive to the business;
- vi. Restricting Haddington Road to one general traffic lane at the Baggot Street junction will cause congestion; and

- vii. Impact on businesses due to restriction of car access to the area from the south.

4.32.2 Response to submission

The response to item i, iii, iv, and vi has been included in Section 2.3.3 of this report. Additional responses to other items raised is presented below.

- ii. Vulnerable Road users would be affected in crossing the road;

There is currently no pedestrian crossing on the north-western arm of the R816 Baggot Street Upper / Waterloo Road signalised junction. The Proposed Scheme proposes a signalised crossing of this arm of the junction, significantly improving crossing facilities for pedestrians, including vulnerable pedestrians, in this location. The Pedestrian Infrastructure Assessment, included in Appendix A6.4 of the EIAR notes that the overall Level of Service for pedestrians at this junction is improved from a D to and A due to the Proposed Scheme. Similarly, the overall Level of Service for pedestrians at the R816 Macartney Bridge / R111 Haddington Road / R816 Baggot Street Upper / Mespil Road signalised junction increases from an E to an A due to the Proposed Scheme. As such, it is noted that the Proposed Scheme will significantly improve facilities for pedestrians in this location, including improved crossing facilities.

- v. Proposal to restrict the right turn onto Baggot Street from Mespil Road will be harmful to business as customers and staff will not be able to drive to the business

The proposed restriction for general traffic turning right from Mespil Road onto Baggot Street Upper is required to improve the operation of this key junction. It is noted that all other right turn movements at this junction are currently restricted, and as such the restriction of the only currently permitted right turn, i.e. from Mespil Road to Baggot Street Upper, would significantly improve the operation of this junction and allow for bus movements along the CBC to be prioritised. Access to the Upper Baggot Street area by private car would still be maintained, albeit motorists would be required to take alternative routes, such as via Burlington Road. It is further noted that due to the proposed bus gate on Pembroke Road, it is envisaged that the demand for this right turn movement would be significantly reduced following the implementation of the Proposed Scheme.

- vi. Restricting Haddington Road to one general traffic lane at the Baggot Street junction will cause congestion;

As outlined in the Junction Design Report contained in Appendix A6.3 of the EIAR, following a review of the junction operation, the removal of the dedicated left turn lane on Haddington Road is proposed to be removed in order to provide cycle facilities on this arm of the junction and was deemed to be the preferred option, with an acceptable reduction in vehicular capacity at the junction. It is noted that Haddington Road is designated as a Secondary Route in the Greater Dublin Area Cycle Network Plan.

4.33 33 – Elm Court Management DAC

4.33.1 Submission – Merrion Road

This objection raised nine potential issues as follows:

- i. Environmental Impact

The submission states that the Environmental Impact Assessment and supporting information has not been provided to them for consideration.

ii. Traffic and Transport

The submission states that the NTA has not provided reassurance that there will not be a significant negative impact on traffic.

iii. Proof of Need

The submission states the NTA has not provided reasons as to the need of the land.

iv. Parking Space

The submission states that the proposals would cause potential parking difficulties to residents, people with disabilities etc.

v. Local Economic Impact

The submission states that high volumes of car traffic may impede local business's ability to trade.

vi. Impact on the Land

The submission states 'Whether the NTA plans to cut down trees etc., whether residence will lose part of their front gardens to accommodate the project' – it is understood that this statement suggests that this information has not been provided by the NTA. The submission also states that the NTA has not confirmed the impact of the scheme on the hedge and electric gate at the access to the property.

vii. Access to the Village

The submission states that they have not be informed whether there will be a one-way system proposed and whether residents will lose direct access to the village by car.

viii. Compensation for usage of land

The submission states that the NTA have not provided a valuation for the land to be acquired at today's prices. It is submitted that the NTA should provide compensation at the value of the land at today's prices rather than the valuation at the time of notice to treat if this value is higher.

ix. Construction Programme

The submission states that the work time schedule for constructing the corridor has not been provided.

4.33.2 Response to submission

This submission was also made in response to the CPO relating to the proposed acquisition of land from the premises. Detailed responses to the issues raised have been provided in Section 3.2.8.

4.34 34 – Elm Park Golf and Sports Club

4.34.1 Submission – Nutley Lane

This objection raised six potential issues as follows:

- i. Need and justification for the Nutley Lane link;

The submission questions the need for the proposed Nutley Lane link and suggests that the submitted document does not adequately justify its inclusion.

- ii. The impacts of the proposed CPO to Elm Park Golf and Sports Club including the main entrance, the 1st Tee, Tennis Court 9, the Golf Practice area and associated bunkers, the 4th and 7th tee areas, the 6th Green and bunker and the Services Entrance;

The submission notes that the loss of land may have an impact on the golf course rating which may impact the attractiveness of the club to new/continued membership. Concern is also noted that the loss of land would impact on the run-off/ retrieval areas at the tennis courts and that this loss will impact the attractiveness for members and the ability to attract elite players.

- iii. Traffic Safety at both the Main Entrance and the Service Entrance;

The submission notes concern over the safety and capacity at each junction. It is suggested that inadequate visibility exists at these junctions.

- iv. Loss of Mature Trees along the Elm Park Golf and Sports Club side of Nutley Lane

The submission notes concern over the loss of trees along Nutley Lane in the vicinity of the Golf and Sports Club suggesting an alternative arrangement could be adopted to retain these.

- v. Impacts on temporary works zones and disturbance during works especially but not restricted to access and security.

- vi. Reduced Cross-Section along Elm Park Golf and Sports Club

The submission suggests that a reduced cross-section along Nutley Lane would result in less or no impact on the Elm Park Golf and Sports Club lands.

The submission notes that the impacts of the Proposed Scheme for Elm Park Golf and Sports Club, in terms of significance and duration for a significant community-based sports club, including the physical and financial effects upon sports facilities and the viability of the club, have not been considered at all in the assessments of environmental effects upon Population and Human Health in Chapters 10 and 11 of the EIAR.

The submission notes that there does not appear to be a strong business case for the Nutley Lane link and that the cost-benefit ratio in terms of physical and ecological impacts has not been resolved in the documentation provided to support the scheme as designed.

The submission requests that the Nutley Lane link be removed by An Bord Pleanála or withdrawn from the scheme entirely by NTA as the case for it has not been proven. If it is to be retained, the submission recommends that it must be with a reduced cross-section along the Elm Park Golf and Sports Club frontage, to mitigate severe impacts upon the club grounds and operations and upon the local environs.

4.34.2 Response to Objection Raised

This submission was also made in response to the CPO relating to the proposed acquisition of land from the premises. Detailed responses to the issues raised have been provided in Section 3.2.9.

4.35 35 – Elmpark Green Development

4.35.1 Submission – Merrion Road

This objection raised three potential issues as follows:

- i. CPO of Elmpark Green lands

The submission queries the need for permanent CPO and whether the proposed works can be facilitated by a temporary acquisition. It is requested that the permanent acquisition be limited to the back of the footpath with the landscaped areas returned to Elmpark Green development upon completion of the works.

The submission states the proposal to permanently acquire the areas to be landscaped could lead to a disjoint in both appearance and maintenance of landscaping owing to the fact that one would be maintained by the landowner and one by the NTA/Local Authority. It is requested that a condition is included to require agreement of the landscaping design at the entrance with Elmpark Green development prior to construction.

ii. Impact on junction operation

The submission states that from a review of the traffic modelling outputs, there are concerns regarding the impact of the proposed works on the operation of the Elmpark Green Junction and associated impacts on accessibility to the development.

iii. Access during Construction

The submission requests that in the event of a grant of permission, a condition is included to ensure the measures outlined in the Construction Environmental Plan are enforced in full. It is also requested that necessary access is maintained for the Elmpark Green Development

4.35.2 Response to submission

This submission was also made in response to the CPO relating to the proposed acquisition of land from the premises. Detailed responses to the issues raised have been provided in Section 3.2.10

4.36 36 – Frame Geraldine and David

4.36.1 Submission – Nutley Lane

This submission objected the proposals at Nutley Lane and raised the following issues:

- i. Need for link through Nutley Lane
- ii. Proposed Scheme does not cater for visitors of St. Vincent's Hospital
- iii. Scheme does nothing to relieve existing congestion levels, which will be exacerbated by the new maternity hospital
- iv. Clarification on the Traffic Management Plan
- v. Ambulance access to St. Vincent's Hospital
- vi. Removal of trees and impact to environment

4.36.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.1.3 of this report.

4.37 37 – Gallagher Conor

4.37.1 Submission – Pembroke Road

This submission objected the proposals at Pembroke Road and raises the following issues:

- i. Consideration of alternative routes;
- ii. Impact of Proposed Scheme on retailers; and
- iii. Removal of on-street parking.

4.37.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.2.3 of this report.

4.38 38 – Gilmartin Kieran

4.38.1 Submission – Other

This submission welcomes the principles of BusConnects but makes the following observations at the Blackrock section:

- i. Retention of Blackrock Park wall and pillars;
- ii. Requests that the NTA confirm that there are no proposals to reduce parking outside No. 1-6 Phoenix Terrace and that there are no proposals to restrict right turning movements from Rock Road onto Phoenix Terrace
- iii. Landscape treatments at median verge on Rock Road between Landscape treatments at median verge on Rock Road between Castledawson and Blackrock Park

4.38.2 Response to submission

- i. Retention of Blackrock Park wall and pillars;

In order to achieve the proposed cross section, permanent land acquisition is required from Blackrock Park. This commences at the corner of Phoenix Terrace where it is required to set back the wall which faces Rock Road by up to 1.5m (at the end closest to the entrance to Blackrock Park) tapering to nothing as the wall turns the corner onto Phoenix Terrace. The section wall which faces Phoenix Terrace will remain in its current location. It is also noted that the section of wall immediately adjacent no. 1 Phoenix Terrace will not be impacted by the proposed works. The extent of permanent land take (solid red line) and temporary land take (dashed red line) required is indicated in Figure 4.1 below.



Figure 4.1: Extent of land take at the corner of Phoenix Terrace / Blackrock Park (Image Source: Google)

- ii. Requests that the NTA confirm that there are no proposals to reduce parking outside No. 1-6 Phoenix Terrace and that there are no proposals to restrict right turning movements from Rock Road onto Phoenix Terrace

In terms of car parking, there are no proposals to materially affect kerblines on Phoenix Terrace. As such, the existing unmetered car parking can continue to operate as per the existing situation.

In terms of turning movement restrictions, there are no proposals to restrict the right turn from Rock Road into Phoenix Terrace

- iii. Landscape treatments at median verge on Rock Road between Castledawson and Blackrock Park

The existing median between Castledawson and Blackrock Park is a hardscape median with no planting. As part of the Proposed Scheme, this median will be retained in its current location. However, where feasible, it is proposed to convert some of this area to soft landscaping. Between Phoenix Terrace and the entrance to Castledawson, where sufficient width is available to allow maintenance, grass has been included in the central median. Additionally, three trees are proposed in the median on the eastern approach to the Castledawson junction. It is considered that trees in the median closer to Phoenix Terrace would restrict visibility, particular for vehicles seeking to turn right out of Phoenix Terrace onto Rock Road.

4.39 39 – Halpenny Patrick

4.39.1 Submission – Nutley Lane

This submission objected the proposals at Nutley Lane and raised the following issues:

- i. Need for link through Nutley Lane
- ii. Proposed Scheme does not cater for visitors of St. Vincent's Hospital
- iii. Scheme does nothing to relieve existing congestion levels, which will be exacerbated by the new maternity hospital
- iv. Clarification on the Traffic Management Plan
- v. Ambulance access to St. Vincent's Hospital
- vi. Removal of trees and impact to environment

4.39.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.1.3 of this report.

4.40 40 – Harte Aidan

4.40.1 Submission – Baggot Street Upper

This submission objects to the Proposed Scheme. The submission highlights the following issues:

- i. BusConnects is out of date post-covid;
- ii. The Proposed Scheme will destroy Upper Baggot Street; and
- iii. The Newton Plan should be considered as an alternative.

4.40.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in 2.3.3 of this report.

4.41 41 – Harte Bronagh

4.41.1 Submission – Baggot Street Upper

This submission objects to the Proposed Scheme. The submission highlights the following issues:

- i. BusConnects is out of date post-covid;
- ii. The Proposed Scheme will destroy Upper Baggot Street; and
- iii. The Newton Plan should be considered as an alternative.

4.41.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.3.3 of this report.

4.42 42 – Heneghan Brendan

4.42.1 Submission – Whole Scheme

The submission raised the following issues:

- i. Consultation Process - Aarhus Convention / Kazakhstan Advice;
- ii. Access issues in Elgin Road area;
- iii. Continue to use existing 7 and 39A routes rather than Pembroke Road and Nutley Lane;
- iv. Extra traffic in local streets;
- v. Bus gates during prescribed hours; and
- vi. Moving bus stops.

4.42.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.4.3.

4.43 43– Hoey Bridget

4.43.1 Submission – Baggot Street Upper

This submission objected the proposals at Baggot Street and raises the following issues:

- i. Impact to business due to disruptions to deliveries
- ii. Removal of on street parking and loading;
- iii. Pedestrian crossing and implications to vulnerable road users;
- iv. Absence of demand for proposed bus frequencies;
- v. Northumberland Road / Mount St is a more suitable route, current proposals will impact the Georgian Streetscape of Pembroke Road and Baggot Street;
- vi. Proposals to remove right turn onto Upper Baggot Street from Mespil will prove harmful to business;
- vii. Proposals for one lane at Haddington Road at Baggot Street Junction will result in congestion;
- viii. Baggot Street bridge is unsuitable for the proposed volume of traffic; and
- ix. Changes to footpath will damage the ability for business to operate and hinder access

4.43.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.3.3 and 4.43 of this report.

4.44 44 – Hoey Daniel J.

4.44.1 Submission – Baggot Street Upper

This submission objected the proposals at Baggot Street and raises the following issues:

- i. Removal of on street parking and loading;

- ii. Pedestrian crossing and implications to vulnerable road users;
- iii. Northumberland Road / Mount St is a more suitable route, current proposals will impact the Georgian Streetscape of Pembroke Road and Baggot Street;
- iv. Proposals to remove right turn onto Upper Baggot Street from Mespil will prove harmful to business;
- v. Proposals for one lane at Haddington Road at Baggot Street Junction will result in congestion;
- vi. Proposals to restrict access from Eastmoreland Place / St. Mary's Road will divide the community;
- vii. Baggot Steet bridge is unsuitable for the proposed volume of traffic; and
- viii. Changes to footpath will damage the ability for business to operate and hinder access

4.44.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.3.3 and 4.43 of this report.

4.45 45 – Hoey Eamon

4.45.1 Submission – Baggot Street Upper

This submission objected the proposals at Baggot Street and Pembroke Road and raises the following issues:

- i. Northumberland Road / Mount St is a more suitable route, current proposals will impact the Georgian Streetscape of Pembroke Road and Baggot Street;
- ii. Baggot Steet bridge is unsuitable for the proposed volume of traffic;
- iii. Impact to wildlife along the Canal due to the proposed increase in bus frequencies.
- iv. Removal of on street parking and loading will be detrimental to business;
- v. Proposed traffic restrictions onto Baggot Street from adjoining roads isolates the street;
- vi. Changes to commuter patters due to Covid-19;
- vii. Impact to heritage from the proposed bus depot at Merrion Square; and
- viii. Consultation with residents.

4.45.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.3.3 of this report.

4.46 46 – Hough Hilary and Rosemary

4.46.1 Submission – Nutley Lane

This submission objected the proposals at Nutley Lane and raised the following issues:

- i. Need for the link through Nutley Lane
- ii. Consideration of alternatives with a lesser environmental impact;

- iii. Rational for rejecting option NL3 and NL4;
- iv. Alternative three lane option with cycle lanes in both directions and shared bus and general traffic lane eastbound;
- v. Removal of trees / hedges and impact to environment
- vi. Choice of material for replacement wall along Elm Park boundary
- vii. Property Value

4.46.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.1.3 of this report.

4.47 47 – Kavanagh Liam

4.47.1 Submission – Nutley Lane

This submission objected the proposals at Nutley Lane and raised the following issues:

- i. Additional lanes and bus traffic will negatively impact the community and residential nature
- ii. Removal of on-street parking and the adverse consequences to property access and congestion on side roads off Nutley Lane
- iii. Traffic Management Plan for greater Nutley area
- iv. Scheme does nothing to relieve existing congestion levels;
- v. Clarifications on the Environmental Impact Assessment Report;
- vi. Removal of trees and hedges and impact to environment
- vii. Increase in air and noise pollution
- viii. Impact on the amenities of properties of properties during construction
- ix. Property values
- x. Two-way cycle track alignment and adverse impact to property access
- xi. Changes to commuting patterns post Covid-19

4.47.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.1.3 of this report.

4.48 48 – Keaveney Andrew

4.48.1 Submission – Pembroke Road

This submission objected to certain aspects of the proposals at Pembroke Road and raises the following issues:

- i. Proposals will severely impact the operation of Morgans Wine Merchants. Customers and deliveries will not be able to access the office.

- ii. Absence of clear loading bays in the proposals;
- iii. Increase in bus frequencies and the associated visual impact of the streetscape;
- iv. Changes to commuter patterns due to Covid-19;
- v. Pembroke Road is a pedestrian route for events at the Aviva Stadium; and
- vi. Northumberland Road / Mount St is a more suitable route with wider roads and a more direct route into the city centre.

4.48.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.2.3 of this report.

4.49 49 – Kelly John

4.49.1 Submission – Baggot Street Upper

This submission raised the following observations on the proposals at Upper Baggot Street:

- i. By restricting access to Upper Baggot Street from the local catchment the proposals will have a detrimental effect on businesses on Upper Baggot Street.
- ii. Removal of trees will adversely affect the character of the area, many of which could be retained with minor changes to the design; and
- iii. Quality of life should be enhanced for people living within the city centre rather than prioritising suburbs.

4.49.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.3.3 of this report.

4.50 50 – Kelly Margaret

4.50.1 Submission – Nutley Lane

This submission objected certain aspects of the proposals at Nutley Lane and raised the following issues:

- i. Need for link through Nutley Lane;
- ii. Access to properties;
- iii. Proposed Scheme does not cater for visitors of St. Vincent's Hospital and new maternity hospital; and
- iv. Scheme does nothing to relieve existing congestion levels, which will be exacerbated by the new maternity hospital;

4.50.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.1.3 of this report.

4.51 51 – Kirwan Georgina

4.51.1 Submission – Baggot Street Upper

This submission objected to the proposals at Upper Baggot Street and raised the following issues:

- i. Removal of on-street parking will hamper the hinder access to local amenities on Baggot Street; and
- ii. Changes to commuter patters due to Covid-19;

4.51.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.3.3 of this report.

4.52 52 – Langkawi Malaysian Restaurant

4.52.1 Submission – Baggot Street Upper

This submission raised the following observation on the proposals at Upper Baggot Street:

- i. Proposals will hinder accessibility to the premises and disrupt deliveries;

4.52.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.3.3 of this report.

4.53 53– Lillis Sarah and Stephen

4.53.1 Submission – Nutley Lane

This submission objected certain aspects of the proposals at Nutley Lane and raised the following issues:

- i. Proposals to change alignment of two-way cycle track and replace existing boundary fence at Elm Park.
- ii. Inaccuracy in the noise and vibration of the operation phase assessment, impact assessed for the entire route along which there are existing bus lanes.
- iii. Choice of location for the noise and vibration receptors;
- iv. Increase in air and noise pollution arising from an increase in traffic volumes has not been captured in the EIAR.
- v. Congestion issues arising from the removal of left-turn lane from Nutley Lane onto Stillorgan Road
- vi. Changes to commuting patterns post Covid-19
- vii. Consideration of alternative
- viii. Congestion and cyclist safety at major junctions along Nutley Lane as a result of increased bus traffic.

4.53.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.1.3 of this report.

4.54 54 – Little Ross

4.54.1 Submission – Baggot Street Upper

This submission objects to certain aspects of the proposals at Pembroke Road and Upper Baggot Street. The following issues were raised:

- i. Proposed traffic restrictions onto Baggot Street Upper from adjoining roads will divide the community and will be detrimental to businesses;
- ii. On-street parking and loading on Upper Baggot Street will negatively affect businesses in the area; and
- iii. Parking restrictions on Upper Baggot Street will push car demand to Waterloo where there is already restricted parking. There is no alternative parking for residents and their visitors.

4.54.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.3.3 of this report.

4.55 55 – Magrath Mary

4.55.1 Submission – Nutley Lane

This submission objects to the proposals at Nutley Lane and raised the following issues;

- i. Inadequacy in consultation;
- ii. Safety implications for vulnerable road users;
- iii. Scheme does nothing to relieve existing congestion levels, which will be exacerbated by the new maternity hospital;
- iv. Access to property;
- v. Increase in air and noise pollution;
- vi. Cumulative traffic impact from proposed developments; and
- vii. Property values.

4.55.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.1.3 of this report.

4.56 56 – Mahon Paul

4.56.1 Submission – Other

This submission raised the following potential issues;

i. Safety of proposed bus stop on Fitzwilliam Street Lower/Fitzwilliam Lane

The submission states that the relocation of the bus stop from Baggot Street Upper to Fitzwilliam Street Lower results in an unsafe environment due to proximity to Fitzwilliam Lane. It is also noted that it places the stop further from pedestrian crossings.

It is further noted that the available footpath width at the Lower Baggot Street would be greater than at Fitzwilliam Street Lower.

ii. Reduced footpath width on Baggot Street Lower

It is noted that narrowing of footpath widths on Baggot Street Lower should be avoided.

iii. Inclusion of Bus Shelters in South Georgian Core

The submissions states that the inclusion of bus shelters in the South Georgian Core is inappropriate in terms of retaining the aesthetics of historical Georgian Dublin.

Routing of buses along Fitzwilliam Street and along the same route

The submission states that the routing of buses along Fitzwilliam Street Lower should be avoided and notes that the impact of this has not been considered in the EIAR or the optioneering citing that option via Mount Street would be more suitable.

The submission notes that consideration was not given to routing cyclists and buses along different routes allowing a reduced cross-section on each.

4.56.2 Response to submission

i. Safety of proposed bus stop on Fitzwilliam Street Lower/Fitzwilliam Lane

As part of the design of the Proposed Scheme a detailed review of bus stop locations was undertaken as set out in Bus Stop Review Report in Appendix H of the Preliminary Design Report provided as Supplementary Information. This exercise was carried out to optimise the performance of the bus services on the Proposed Scheme by reducing the journey time of the bus service, increasing the walking catchment of the bus stops and ensuring that key trip attractors located along the route are sufficiently covered within the catchment of bus stops.

The main principles considered as part of the review are as follows:

- Aim to achieve a bus stop spacing of 400m in suburban locations, and 250m in urban centres;
- Locate bus stop to nearest junction/pedestrian crossing;
- Locate bus stop downstream of junction rather than upstream;
- Consider space requirements to provide bus stop including shelter, waiting area, cycle lane and footpath provision and information displays;
- Review existing and proposed boarding & alighting volumes to determine the size of the bus stop; and
- Consider the potential for interchange with orbital bus services proposed as part of the New Dublin Area Bus Network.

As noted in Appendix B1 of the Bus Stop Review Report it is proposed to move bus stop 784, which is currently located on Baggot Street Lower, to Fitzwilliam Street Lower 35m from the junction. It is noted that this provides better spacing with the previous stop (c.300m versus 210m if retained in its current position) and provides an inbound bus stop on Fitzwilliam Street where there is currently none. Furthermore, the proposed location

better aligns with the principle to location bus stops downstream of a junction to better improve the flow of buses.

The exact positioning of the bus stop has been driven by the ability to locate a shelter along this section without impeding on access to adjacent properties. The location identified is the optimum location for this shelter. It is noted that while a stationary bus may temporarily impede visibility to pedestrians and cyclists crossing Fitzwilliam Lane, this will be intermittent and for a short duration. The alternative in this location was to locate the shelter in advance of Fitzwilliam Lane but as this would permanently interfere with visibility, the Proposed Scheme was identified as the most suitable arrangement.

It is further noted that Road Safety Audits have been undertaken for the Proposed Scheme and are included as Appendix M of the Preliminary Design Report provided in the Supplementary Information. These audits did not highlight any safety concerns with the proposed arrangement.

In terms of footpath width, at the proposed bus stop location, footpath widths will be retained at 2.3m to the rear of the shared landing bus stop.

ii. Reduced footpath width on Baggot Street Lower

It is acknowledged that in order to facilitate the Proposed Scheme, it will be necessary to reduce footpath widths along Baggot Street Lower in some locations. This is required to facilitate segregated cycle tracks which will significantly enhance the safety and attractiveness of cycling in the area thus meeting the objectives of the scheme. It is noted that no footpath will be reduced to less than the desirable minimum of 2m and the vast majority of footpaths along Baggot Street Lower will be in the region of 2.5m to 3m as per the existing situation.

The Level of Service (LoS) assessment presented in Chapter 6 of the EIAR highlights the improvements in this area as a result of the Proposed Scheme with the LoS for cyclists increasing from LoS D to LoS B between Haddington Road and Fitzwilliam Street, and from LoS D to LoS A along Fitzwilliam Street.

iii. Inclusion of Bus Shelters in South Georgian Core

The streetscape impact of new bus shelters along Fitzwilliam Street Lower has been assessed in 16.4.4.1 of Chapter 16 of the EIAR as follows:

A bus shelter is proposed at numbers 5 and 7 Fitzwilliam Street (DCC RPS 2869, 2871) protected structures of Regional Importance and Medium Sensitivity. There is no bus shelter in this location currently. Fitzwilliam Street also forms part of the Georgian Mile which runs from Merrion Square to Leeson Street. The proposed bus shelter will detract from the protected structures and on the streetscape and vistas of the Georgian Mile. The Magnitude of the impact is Low. The potential Operational Phase impact is Indirect, Negative, Slight and Longterm.

Section 16.4.4.3 assesses the impact on the conservation area:

A bus shelter is proposed at number 5 and 7 Fitzwilliam Street (DCC RPS 2869, 2871). There is no bus shelter in this location currently. Fitzwilliam Street Lower Conservation Area contains protected structures of Regional and National Importance and is of High Sensitivity. It is also forms part of the Georgian Mile which runs from Merrion Square to Leeson Street. The proposed bus shelter will be highly visible and will detract from the protected structures and on the streetscape and vistas of the Georgian Mile, the magnitude of which is Low. The potential Operational Phase impact is Indirect, Negative, Slight and Long-term.

iv. Routing of buses along Fitzwilliam Street and along the same route

A detailed response setting out the rationale for the routing of buses along Baggot Street Upper in lieu of Mount Street is provided in Section 2.3.3.

It is further noted in section 3.2.2 of the Preferred Route Option Report provided in the Supplementary Information, that although Fitzwilliam Street fell within the Study Area of the Laoghaire to City Centre Core Bus Corridor Options Study 'Dún Feasibility and Options Assessment', it did not form part of the route sections assessed in the development of the EPR Option.

The Proposed Scheme was subsequently extended onto Fitzwilliam Street Lower for the following reasons:

- To improve the integration with new and existing sustainable transport facilities on the street itself and on Merrion Square;
- To provide cycle facilities on the Secondary Route of the GDA Cycle Network Plan; and
- To increase the catchment of the Proposed Scheme in terms of Combined Activity Density. In particular, this relates to significant new and existing commercial properties in this area.

It is noted that within the EIAR, the impacts on of the Proposed Scheme on Fitzwilliam Street are considered across all criteria. Within section 16.3.1.5.5 of Chapter 16 Architectural Heritage, the designation of Fitzwilliam Street Lower as a conservation area is acknowledged as having a national importance and high sensitivity. The following is noted with respect to impacts during construction:

The Proposed Scheme lies within two Conservation Areas of National Importance and High Sensitivity. They include the Baggot Street Lower Conservation Area and the Fitzwilliam Street Conservation Area. Both contain heritage kerbs, coal holes and cobbles which will be directly impacted by changes in the alignment of the footpaths to accommodate bus and cycle lanes as well as paving and landscaping works. The removal of the kerbs coal holes and cobbles will carry a potential risk of loss or damage during their removal, transportation, storage and reinstatement. The pre-mitigation Construction Phase impact is Direct, Negative, Significant and Temporary. Mitigation with regard to the protection of the historic paving is recommended in Section 16.5.1.8 reducing the magnitude of the risk from High to Low. The predicted residual Construction Phase impact is Direct, Negative, Slight and Temporary.

The Baggot Street Lower Conservation Area, Fitzwilliam Street Conservation Area and the Merrion Square Conservation Area contain protected structures and other architectural heritage features of Regional and National importance and Medium to High Sensitivity which fall within the study area, and front onto or share a boundary with or are within the Proposed Scheme. While these features will not be directly impacted by the Proposed Scheme, there is potential for damage during construction. The pre-mitigation Construction Phase impact is Indirect, Negative, Significant and Temporary. Mitigation is the recording, protection and monitoring of the sensitive fabric prior to, and for the duration of the Construction Phase. Recording, overseeing of protective measures and monitoring is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor, in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR, reducing the magnitude of the risk from Medium to Low. The predicted residual Construction Phase impact is Indirect, Negative, Slight and Temporary.

Chapter 17 of the EIAR assesses the impact of the Proposed Scheme on Landscape and Visual where it is concluded that the potential townscape / streetscape and visual effect of the Construction Phase is assessed to be Negative, Very Significant and Temporary / Short-Term.

However, in terms of the operational phase, due to the streetscape improvements proposed the potential townscape / streetscape effect is assessed to be Positive, Moderate and Short-Term, becoming Positive, Moderate / Significant and Long-Term

4.57 57 – Mathews Clare

4.57.1 Submission – Nutley Lane

This submission objected certain aspects of the proposals at Nutley Lane and raised the following issues:

- i. Cyclist and pedestrian safety;
- ii. Ambulance access to St. Vincent’s University Hospital;
- iii. Alternative options.

4.57.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.1.3 of this report.

4.58 58 – McAuley Muiris

4.58.1 Submission – Baggot Street Upper

This submission raised the following observations on the proposals at Upper Baggot Street:

- i. Proposals to remove loading bays and on-street parking will be detrimental for businesses on Upper Baggot Street;
- ii. Increase in bus frequencies will result in a loss of through traffic adversely affecting businesses; and
- iii. Proposed traffic restrictions will reduce accessibility to Upper Baggot Street

4.58.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.3.3 of this report.

4.59 59 – McDermott Brian

4.59.1 Submission – Nutley Lane

This submission objected certain aspects of the proposals at Nutley Lane and raised the following issues:

- i. Removal of on-street parking and the adverse congestion on side roads off Nutley Lane;
- ii. Traffic Management Plan for Nutley Lane;
- iii. Access to property and safety implications of crossing additional lanes;
- iv. Removal of trees / hedges and impact to environment;
- v. Property value;
- vi. Changes to commuting patterns post Covid-19;

- vii. Need for link through Nutley Lane; and
- viii. Installing traffic signals at all junctions contradict the objective to provide an express bus route.

4.59.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.1.3 of this report.

4.60 60 – McEvoy Jack and Freeda

4.60.1 Submission – Nutley Lane

This submission outlined observations of the proposals at Nutley Lane and raised the following issues:

- i. Consultation process;
- ii. Consideration of options for Nutley Lane;
- iii. Removal of trees and hedges and environmental impacts
- iv. Consideration of alternative routes; and
- v. Damage to community.

4.60.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.1.3 of this report.

4.61 61 – McGee Siobhan and Others

4.61.1 Submission – Other

This submission contains three separate submissions made on behalf of a number of residents associations, namely the Woodbine Glenomena Resident's Association, the Seafeld Residents' Association and the Trimleston Resident Association, which are collectively known as the 'Montara' forum of resident's associations. The submission welcomes the overall improvements and is supportive of proposed improvements to cycle infrastructure. The submission outlines a number of issues with the Proposed Scheme including:

- i. The Proposed Scheme is aiming to achieve a lot in a narrow varied corridor which will lead to compromises and reductions in levels of service for some modes;
- ii. Believes that the proposals will result in a build-up of traffic at specific junctions which will impact on residents of the surrounding area;
- iii. Believes that proposed turn bans will restrict access to the surrounding areas;
- iv. Toucan crossings are not welcomed;
- v. The hours of operation of the corridor are not clear;
- vi. Concerns about construction stage impacts;
- vii. Concerns about redistribution of traffic due to the proposed Bus Gate;

- viii. Concerned about the reduction in the number of bus stops; and
- ix. Concerned that Archaeological, Cultural and Architectural heritage will be irrevocably changed. Bloomfield gates are specifically referenced.

4.61.2 Response to submission

- i. The Proposed Scheme is aiming to achieve a lot in a narrow varied corridor which will lead to compromises and reductions in levels of service for some modes

The NTA acknowledges that there are constraints along the route of the Proposed Scheme, as there are with the delivery of most urban transport infrastructure. Notwithstanding these constraints, the need for the Proposed Scheme has been comprehensively outlined in EIAR Volume 2, Chapter 2 Need for the Proposed Scheme. EIAR Volume 2, Chapter 3 Consideration of Reasonable Alternatives outlines the significant body of work which has been carried out in order to arrive at the Preferred Route Option for the Proposed Scheme. The submission notes that constraints have led to disruption to levels of service in a number of locations and references the proposed signal controlled priority for buses on the Merrion Road and reductions in the proposed width of cycle tracks in some locations. At such pinch points, design decisions have been made in line with the objectives of the Proposed Scheme and the road user hierarchy set out in DMURS and other policy documents which notes that designers should consider pedestrians first, followed by cyclists, then public transport with private motorists at the bottom of the hierarchy. At specific pinch points on the scheme, the NTA has balanced the competing objectives of the Proposed Scheme with each other, using the hierarchy as a guide, and with the impacts on the surrounding environment.

In relation to pedestrian infrastructure it is noted that the Proposed Scheme will make significant improvements through the provision of increased signal crossings, introduction of traffic calming measures, improved accessibility, increased pedestrian directness and wider footpaths and crossings. The number of pedestrian signal crossings will increase by approximately 41% as a result of the Proposed Scheme.

It is noted that the Proposed Scheme proposes segregated cycle tracks along 100% of its length in both directions, including protected junctions for cyclists. This is compared to 4% and 5% This is compared to the existing provision of cycle tracks along 4% and 5% of the route inbound and outbound respectively with approximately 47% and 59% of the route, outbound and inbound respectively, having no cycle facilities or having cyclists sharing the bus lane.

In relation to bus priority, it is noted that the length of bus lanes proposed will increase from 3.2km to 7.4 km in the inbound direction and will increase from 2.9km to 7.3km in the outbound direction. The total proportion of the Proposed Scheme with Bus Measures following the implementation of the Proposed Scheme will be 100%, a significant increase from the existing 37%.

The NTA acknowledges the comments that the Proposed Scheme is aiming to achieve a lot within a constrained corridor and believes that through extensive consultation and considered design the Proposed Scheme as submitted will deliver significant benefits for the modes at the top of the road user hierarchy, and achieve the scheme objectives.

- ii. Believes that the proposals will result in a build-up of traffic at specific junctions which will impact on residents of the surrounding area

The NTA notes the concerns raised about the potential for traffic queuing at specific junctions. The junctions of particular concern raised in this submission are the junction of Rock Road and Trimleston Avenue and the junction of Nutley Lane and the Stillorgan Road. The concerns primarily relate to the reallocation of road space from general traffic

to other modes and reference the removal of general traffic lanes along the corridor, the removal of turning lanes at junctions.

EIAR Volume 2 Chapter 2 outlines the rationale by which the Proposed Scheme has been designed:

“The Proposed Scheme design involves the prioritisation of People Movement, focusing on maximising the throughput of sustainable modes (i.e. Walking, Cycling and Bus modes). A quantitative people-movement assessment, as part of the transport impact assessment, facilitates a comparison of the Do Minimum and Do Something peak-hour scenarios for the forecast years (2028 and 2043). The benefits resulting from the 2028 AM Peak Hour people-movement assessment shows that there is an increase of 100% in the number of people travelling by bus, an increase of 67% in people walking or cycling, and a reduction of 50% in the number of people travelling by car along the Proposed Scheme. This is summarised in Image 2.9.”



Image 2.9: Average People Movement by Mode during 2028 AM Peak Hour

The priority of the Proposed Scheme is to increase the movement of people through junctions and along the corridor. The most effective way to do so is through Public Transport and sustainable modes, including walking and cycling. The reallocation of road space to such sustainable modes will increase the overall people movement along the corridor, and as such will meet the objectives of the Proposed Scheme.

Chapter 6 of the EIAR Traffic & Transport outlines the impacts of the Proposed Scheme. In relation to pedestrian infrastructure the level of service at the Rock Road/Trimleston Avenue junction will increase from a C to an A. Cycling infrastructure on approach to and exiting this junction will improve from a level of service of C/B to an A.

The junction Design Report which is included in Appendix L of the Preliminary Design Report in the Supplementary Information, highlights that this junction operates with 5%

Practical Reserve Capacity in the 2028 AM peak and 11% Practical Reserve Capacity in the 2028 PM peak. As such, the junction is anticipated to operate within capacity following the implementation of the Proposed Scheme.

In relation to pedestrian infrastructure the level of service at the Nutley Lane/Stillorgan Road junction will increase from an F to an A. Cycling infrastructure on Nutley Lane leading to this junction will improve from a level of service of D to an A.

The junction Design Report which is included in Appendix L of the Preliminary Design Report in the Supplementary Information, highlights that this junction operates with -5% Practical Reserve Capacity in the 2028 AM peak and 56% Practical Reserve Capacity in the 2028 PM peak. As such, the junction is anticipated to operate within capacity in the PM peak hour following the implementation of the Proposed Scheme, and slightly above capacity in the AM peak.

- iii. Believes that proposed turn bans will restrict access to the surrounding areas

The submission notes that the proposed turn bans will necessitate more circuitous routes for residents to access their destinations. The submission also queries whether these cumulative changes will result in more traffic traversing this route to progress to Dublin Port and/or the Port Tunnel.

Section 4.16 of the Preliminary Design Report included in the Supplementary Information notes the following with respect to the proposed turn bans for general traffic:

“Turning bans and other traffic management measures will be implemented on the route to direct traffic away from either the Proposed Scheme corridor (to maximise bus journey time reliability) or to limit use of side streets as a short-cut route by through traffic.”

Proposed turn bans may require drivers to utilise new routes, however access by car will be maintained to all locations as per existing arrangements. Chapter 6 of the EIAR Traffic and Transport has assessed the likely impact of the proposed scheme on general traffic on the indirect study area. The indirect study area is defined as follows:

“This is the area of influence that the Proposed Scheme has on changing traffic volumes above a defined threshold with reference to TII’s Traffic and Transport Assessment Guidelines (May 2014) (see Section 6.4.5.4.6 for further details on the threshold applied in relation to traffic volume changes used in the definition of the indirect study area).”

This assessment has not identified that additional traffic would use the route of the Proposed Scheme to access Dublin Port or the Port tunnel.

- iv. Toucan crossings are not welcomed

The National Cycle Manual notes that where practicable, the segregation of pedestrians and cyclists is desirable, and shared facilities should not be considered as a first option. The National Cycle Manual recognises, however, that in some cases, shared facilities are appropriate. The design of the Proposed Scheme has been undertaken such that pedestrians and cyclists are segregated wherever practicable and shared spaces are only used in specifically constrained locations, typically at junctions where there is insufficient space to provide a protected junction and thereby requiring cyclists to make turning movements via toucan crossings.

- v. The hours of operation of the corridor are not clear

Bus lanes will operate 24 hours a day 7 days a week. The proposed Bus Gate on Pembroke Road will operate from 06:00 to 20:00 Monday to Sunday as noted on the General arrangement drawings.

- vi. Concerns about construction stage impacts

The submission raises a number of concerns about construction stage impacts including how the mitigation proposed in the Natura Impact Statement (NIS) will be reviewed and managed during construction. The Booterstown Marsh is noted in particular and concerns relating to Japanese Knotweed are highlighted. The submission also raises concerns about the location of the construction compound within the Booterstown Carpark and raises specific queries which relate to the storage of material and interactions between construction traffic and other road users during the construction stage. The submission also raises concerns about the construction programme and queries why the project has not been phased.

EIAR Volume 2 Chapter 5 Construction notes the following with regard to how potential Construction stage environmental impacts will be managed:

“As stated in Section 5.1, a Construction Environmental Management Plan (CEMP) has been prepared for the Proposed Scheme and is included as Appendix A5.1 in Volume 4 of this EIAR. The CEMP will be updated by the NTA prior to finalising the Construction Contract documents for tender, so as to include any additional measures required pursuant to conditions attached to An Bord Pleanála’s decision. It will be a condition of the Employer’s Requirements that the successful contractor, immediately following appointment, must detail in the CEMP the manner in which it is intended to effectively implement all the applicable mitigation measures identified in this EIAR. The CEMP has regard to the guidance contained in the TII Guidelines for the Creation, Implementation and Maintenance of an Environmental Operating Plan, and the handbook published by Construction Industry Research and Information Association (CIRIA) in the UK, Environmental Good Practice on Site Guide, 4th Edition (CIRIA 2015).

Details of mitigation measures proposed to address potential impacts arising from construction activities are described in Chapter 6 (Traffic & Transport) to Chapter 21 (Cumulative Impacts & Environmental Interactions) as appropriate and are summarised in Chapter 22 (Summary of Mitigation & Monitoring Measures) of this EIAR. A number of sub-plans have also been prepared as part of the CEMP and these are summarised in the following sections.

For the avoidance of doubt, all of the measures set out in the CEMP and the sub-plans appended to this EIAR will be implemented in full by the appointed contractor to the satisfaction of the NTA.”

In relation to the potential for impacts on the Booterstown Marsh, Table 5.2 of the Construction Environmental Management Plan (CEMP) summarises the Construction Phase mitigation measures which the appointed contractor will be required to implement. A number of these mitigation measures, namely WT1, WT2, WT3, WT4, BD21 and BD22, specifically relate to mitigating construction stage impacts on Booterstown Marsh and Williamstown Creek. Section 5.4.4.1 of the CEMP provides further detail relating to the proposed Construction Compound and additional measures which will be required by the Contractor appointed to deliver the Proposed Scheme. Section 5.4.4.2 further details additional measures to protect the Booterstown Marsh. As noted in the CEMP, the NTA shall set out the Employer’s Requirements in the Construction Contract including all applicable mitigation measures identified in the EIAR, as well as additional measures required pursuant to conditions attached to any decision to grant approval.

Section 5.4 of Chapter 5 sets out the proposed Construction Programme, which is robust. The following is noted:

“In order to achieve the overall programme duration, it will for the most part, be necessary to work on more than one section / sub-section at any one time. The programme has been prepared with a view to providing as much separation as practicable between sections under construction at any given time. This has been done in order to minimise

traffic disruption and facilitate the ease of movement of sustainable modes, bus services and goods along the Proposed Scheme.”

vii. Concerns about redistribution of traffic due to the proposed Bus Gate

The NTA note the comments raised in the submission in relation to the proposed bus gate on Baggot Street Upper. The rationale for the provision of this bus gate is outlined in Chapter 3 of the EIAR, Consideration of Reasonable Alternatives. As outlined earlier in the response to this submission, a route along Pembroke Road and Baggot Street Upper was identified as the Emerging Preferred Route for the Proposed Scheme.

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

- New and updated topographical survey information;
- Output from engagement and consultation activities on the Emerging Preferred Route and draft Preferred Route Option proposals;
- Further design development and options assessment; and
- Changes in the extent of the scheme.

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

One such area where alternative design options were developed and assessed was Pembroke Road and Baggot Street Upper. Section 3.4.1.1.2 of Chapter 3 of the EIAR summarises this options assessment process as follows:

“The EPR Option along Pembroke Road (between Baggot Street Upper to Northumberland Road) would impact on mature trees and antique railings. Consultation also identified safety concerns around narrowed footpaths as well as the importance of the local on-street parking for residents. Four options were assessed, as follows:

- Option PR1: EPR Option with the road realigned to remove impact on existing access steps to properties on the northern side and reapportion all land acquisition to the southern side of the road (4 lane cross-section + cycle tracks + parking);
- Option PR2: Removal of land acquisition on the northern side as per PR1, however, with removal of all parking along the section, including removal of space between parking bays for tree planting (4 lane cross-section + cycle tracks);
- Option PR3: Removal of land acquisition on the northern side as per PR1, however, with only a one-way outbound traffic lane and with Bus Lanes and cycle tracks in each direction (3-lane cross-section + cycle tracks + parking); and
- Option PR4: Introduction of a single Bus Gate between Waterloo Road and Eastmoreland Place with two general traffic lanes from there to the Northumberland

Road junction, with retention of all trees and no impact to property boundaries (2-lane cross-section + cycle tracks + parking).

The preferred option was identified as Option PR4 – comprising the provision of two traffic lanes and a Bus Gate at the western end of Pembroke Road. Compared to the alternative options, this will not require permanent land take through road widening nor on-street tree removal and will retain and, in some areas, widen footpaths.

In terms of the sub-criteria under the Environment criterion, the preferred option performed significantly better than the other options in relation to Flora & Fauna as it does not require the removal of any trees, whereas the others required the removal of a significant number of trees. In terms of Air Quality and Noise & Vibration, the preferred option again performed the best as it removes significant volumes of traffic from the road and reduces the carriageway width.

In terms of Architectural Heritage, Landscape & Visual and Land Use Character, the preferred option does not require tree removal nor permanent land acquisition and was ranked the highest under these categories. This option also retains the highest amount of parking. Each of the other options require land acquisition from properties that are on the record of protected structures and tree removal along the street. In these options existing parking volumes are also significantly reduced.

The preferred option performed equally to all other options in the remaining sub-criteria under Environment.

As such it is noted that the preferred option scored significantly higher under the environmental criteria compared to the other options, and overall it best met the Proposed Scheme objectives when compared to the other options. It is noted that other options were also considered in the area but were not carried forward to the MCA for the reasons briefly outlined below:

- *Option of reversing the direction of the proposed one-way general traffic in Route Option PR3. This option was examined and sifted out as the outbound direction was considered to be the better option for a one-way road. This is primarily due to Pembroke Road's proximity to the city centre, which would have a higher probability of becoming congested more often if there are a higher quantity of inbound general traffic streets in comparison to outbound general traffic streets. This could, in turn, impact on bus operations within the city centre core;*
- *Option of removing cycle tracks on Pembroke Road and providing an off-line cycle route. This option was examined but not considered a viable solution due to a number of factors. Firstly, Pembroke Road is defined as a primary cycle corridor in the GDA Cycle Network Plan. In addition, alternative routes were examined in order to determine if suitable cycle routes could be facilitated on a number of adjacent streets and lanes, but each of these routes were found to not meet the criteria of a primary cycle track under criteria including directness, safety and attractiveness and comfort; and*
- *Option of providing one-way general traffic outbound (as in Route Option PR3) yet with the removal of all on-street parking (as in Route Option PR2). This option was examined and sifted out, as such an option was not expected to offer the same benefits arising from a Bus Gate arrangement, in terms of Environmental criteria (with the Bus Gate option PR4 scoring higher in all Environmental sub-criteria with the exception of Soils, Geology & Hydrogeology under which it was neutral), while sharing negatives arising from both the one-way arrangement being assessed (regarding Traffic Integration) and the removal of parking being assessed (regarding loss of parking under Land Use Character)."*

All reasonable alternatives have been considered and that the Preferred Route Option best meets the objectives of the Proposed Scheme and performs the best under the assessment criteria as outlined in the 'Common Appraisal Framework for Transport Projects and Programmes' published by the Department of Transport, Tourism and Sport (DTTAS), March 2016.

viii. Concerned about the reduction in the number of bus stops

Section 4.6.4.5 of EIA outlines the approach to the provision of bus stops along the Proposed Scheme:

"To improve the efficiency of the bus service along the Proposed Scheme the position and number of bus stops has been evaluated as part of a bus stop assessment. The criteria that are considered when locating a bus stop are as follows:

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

For the Core Bus Corridor Infrastructure Works it is proposed that bus stops should be preferably spaced approximately 400m apart on typical suburban sections of route, dropping to approximately 250m in urban centres.

It is important that bus stops are not located too far from pedestrian crossings as pedestrians will tend to take the quickest route, which may be hazardous. Locations with no or indirect pedestrian crossings should be avoided.

The following bus stop designs were considered for use on the Proposed Scheme - the Island Bus Stop, the Shared Landing Bus Stop, the Inline Bus Stop and the Layby Bus Stop.

Further detail on the design and locations of bus stops along the Proposed Scheme are described in Section 4.5."

ix. Concerned that Archaeological, Cultural and Architectural heritage will be irrevocably changed. Bloomfield gates are specifically referenced

EIA Volume 2, Chapter 15 Archaeological and Cultural Heritage and Chapter 16 Architectural Heritage have assessed the Proposed Scheme in the context of the likely Archaeological, cultural and architectural heritage impacts. Both of these assessments have concluded that there will be no significant residual impacts either in the Construction or Operational Phase of the Proposed Scheme following mitigation.

Section 15.5.1.5 of EIA Volume 2, Chapter 16 Architectural Heritage notes the following with regard to the proposed relocation of the entrance gate at Bloomfield:

"The gothic gateway wrought and cast-iron gates, formerly to Bloomfield House, Merrion Road (CBC1415BTH110) will be repositioned in an alternative location at the pedestrian

plaza at the junction of Merrion Road and Nutley Lane as a result of a land take to accommodate a new bus lane and cycle lane. The gateway is formerly associated with the demesne of Bloomfield House (NIAH 2447). The gateway is of Regional Importance and Medium Sensitivity and is all that survives of the demesne landscape. The pre-mitigation Construction Phase impact is Direct, Negative, Moderate and Permanent. The mitigation is the recording of the gothic gateway and wrought iron gates and the various elements are to be labelled before the gateway is carefully taken down. Recording is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor. The materials are to be stored in a secure location during the construction work. The gateway and gates will be reinstated at the pedestrian plaza at the junction of Merrion Road and Nutley Lane. The gates will remain open and in a fixed position. The architectural heritage specialist will oversee the labelling, taking-down and reinstatement of the affected gates, railings, piers, and masonry. Works to historic fabric will be carried out in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR. The reinstatement of the gothic gateway ensures that it will be preserved and reduces the magnitude of impact from Medium to Low. The predicted residual Construction Phase impact is Direct, Negative, Slight and Long-term.”

The impact of the relocation of this feature has been appropriately addressed in the EIAR.

4.62 62 – McGrath Damian

4.62.1 Submission – Baggot Street Upper & Pembroke Road

This submission objected to the proposals at Baggot Street Upper and raised the following issues:

- i. By restricting access to Upper Baggot Street from the local catchment the proposals will have a detrimental effect on businesses on Upper Baggot Street;
- ii. Proposed Cycle Lanes on Pembroke Road will impede residential access to parking outside their properties;
- iii. Impact to Georgian architecture on Baggot Street, Pembroke Road and Raglan Road;
- iv. Access to property.

4.62.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.2.3 and 2.3.3 of this report.

4.63 63 – McKillen Dr Mike

4.63.1 Submission – Nutley Lane

This submission outlined observations of the proposals at Nutley Lane and raised the following issues:

- i. Focus on modal shift for school children attending St. Michael's;
- ii. Unsatisfactory Cycling Level of Service along Nutley Lane;
- iii. Enforcement of traffic management; and
- iv. Prohibited turns to accommodate cyclists and promote a modal shift.

4.63.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.1.3 of this report.

4.64 64 – Merrion Road Residents Association

4.64.1 Submission – Merrion Road

This submission objects to elements of the proposed scheme and is primarily focused on the section of Merrion Road between Merrion Gates and Herbert Avenue / St. Vincent's Hospital. The Merrion Road Residents Association consider that elements of the scheme are disproportionately destructive in terms of its impact on the Residential Conservation Area / Protected Structures and have suggested the following amendments:

- i. Extend the proposed 3-lane carriageway from Elm Court Apartments to the junction at Estate Avenue;
- ii. Reduce the size of the parking bay so that it does not require the removal of mature trees;
- iii. Obviate the need for any alteration to the existing boundaries of protected structured structures at 147 – 153 Merrion Road by extending the proposed 3-lane carriageway from Elm Court Apartments to the junction at Estate Avenue;
- iv. Replace the 3 car parking spaces in front of Numbers 266 – 270 Merrion Road with an outbound stop, retaining the two mature trees, and possibly remove the outbound stop south of Merrion Gates; and
- v. Retain the IMCO concrete seats, ideally in their current location, but if that is not feasible in a suitable adjacent location.

4.64.2 Response to submission

- i. Extend the proposed 3-lane carriageway from Elm Court Apartments to the junction at Estate Avenue

The submission suggests that the proposed signal-controlled priority from the junction of R118 Merrion Road and Strand Road (Merrion Gates junction) could be extended past no.157 Merrion Road thus eliminating the impact on properties in this area.

As noted in section 4.5.2.1 of Chapter 4 of the EIAR, between the Merrion Gates junction and Elm Court, it is proposed to provide a three-lane carriageway along this section with a footpath and cycle track in both directions. The carriageway will comprise two general traffic lanes (one in each direction) and one outbound bus lane. Priority for inbound buses will be provided via signal-controlled priority at the Merrion Gates junction which will control the use of the shared inbound traffic lane between the Merrion Gates junction and Elm Court.

As stated in section 3.4.4.4 of Chapter 3 of the EIAR, the issue which required consideration was the bus lane on the Merrion Road inbound, immediately after the Merrion Gates junction. The Emerging Preferred Route proposed a full cross-section at this location, which would require land acquisition from 7 residential properties, the full demolition of another property and land acquisition from a commercial property over a section of 100m. Three of these properties possess very limited front gardens of approximately 2.5m depth, which the Emerging Preferred Route would effectively remove, resulting in these properties front doors being accessed directly from the new footpath. Additionally, nos. 165 and 167 Merrion Road have short driveways of c. 4.5m

which would have been materially impacted by the previously proposed land take such that it would not have been possible to provide parking in front of these properties. An alternative option was considered to investigate if the impacts of the Emerging Preferred Route could be lessened while achieving the core objectives of the Proposed Scheme. The following design options were assessed:

- **EPR Option.** This option is the option as described above whereby fully segregated bus lanes and cycle tracks, together with footpaths and general traffic lanes are provided in both directions. This option ensures full priority for inbound buses; and
- **Alternative Option.** This option delays the re-introduction of the inbound bus lane on Merrion Road for approximately 100m after the Merrion Gates junction. Buses approaching the Merrion Gates junction inbound, will have a bus priority signal to stop inbound general traffic and permit inbound buses to join the shared general traffic lane between the Merrion Gates junction and Elm Court. Traffic signal operation would be configured to keep the general traffic lane clear of stationary traffic to prevent delay to buses in the shared section. This option removed the need for land acquisition and full demolition of property, permits fully segregated cycle facilities and permits some on-street parking to be retained.

While fully segregated bus lanes will be omitted over a 100m section of the Proposed Scheme, due to its location at a signalised junction on the route and the short length of shared lane, it will be possible to provide bus priority through this section without increased delay to buses. Given that the Alternative Option can still provide bus priority it is preferred when compared to the EPR Option which would result in land acquisition and property demolition. The Alternative Option has therefore been included in the final Preferred Route Option.

It is noted that the starting point of the bus lane in the inbound direction is located immediately after the aforementioned constraint at no. 165 Merrion Road so as to maximise the amount of physical priority afforded to buses, and limit the potential for queuing traffic approaching the SVUH junction (in the inbound direction) to extend beyond the available physical bus lane. This proposal provides c. 170m of physical bus priority in advance of the SVUH junction with a length of c. 110m controlled by signal-controlled priority. Extending the area of signal-control priority, and reducing the length of dedicated bus lane to remove land take from numbers 151 to 157 Merrion Road, would reduce the physical bus lane in this area to only 85m in advance of the SVUH junction and increase the signal-controlled priority length to almost 200m. It is considered that significantly reducing the available queuing space for vehicles on approach to the SVUH junction would introduce an unacceptable risk to the progress of buses through this area and as such this is not considered to be an option that meets the scheme objectives.

- ii. Reduce the size of the parking bay so that it does not require the removal of mature trees

The Proposed Scheme provides 5 car parking spaces in front of No. 264 – 270 Merrion Road. These spaces have been provided to facilitate some degree of parking for properties in the vicinity which do not have off-street parking and which currently rely on on-street car parking. The proposed parking bay has been positioned in the only location in this area that would not require any land acquisition. It is acknowledged that 2 no. trees will be removed to facilitate this proposal. However, in the immediate vicinity and on the same side of the road, it is proposed to plant 5 new semi-mature trees.

- iii. Obviate the need for any alteration to the existing boundaries of protected structured structures at 147– 153 Merrion Road by extending the proposed 3-lane carriageway from Elm Court Apartments to the junction at Estate Avenue

As noted in response to item i, the suggested alternative would not meet the objectives of the scheme and introduce an unacceptable risk to the progress of buses through this area.

In terms of impact on Protected Structures, this is set out in Appendix A16.2 Inventory of Architectural Heritage Sites in Volume 4 of the EIAR. This appendix outlines the locations of the Protected Structures along the Proposed Scheme which includes the referenced RPS 5091 to 5088 houses at 147 - 153 Merrion Road. The impact of the proposed works at this location is set out in section 16.4.3.1. This section notes that the existing boundary consists of wrought and cast-iron railings in cut granite plinths with wrought and cast-iron gates and are Protected Structures and are to be repositioned to facilitate a land take which will accommodate a bus and cycle lane. The buildings are of Regional Importance and Medium Sensitivity. The Magnitude of the impact is Medium. The potential Construction Phase impact is Direct, Negative, Moderate and Permanent.

However, mitigation is proposed as described in section 16.5.1.1 of the EIAR where it states that the mitigation is for recording the existing boundaries in position prior to the commencement of construction works. The affected masonry, brickwork, railings, gates, gate posts, capping stones are to be labelled prior to their careful removal to safe storage, and their reinstatement on new lines, reinstating the existing details, and the relationships between the entrances and the historic buildings. Recording is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor. The architectural heritage specialist will oversee the labelling, taking-down and reinstatement of the affected gates (which will be widened for safety reasons), the railings, piers, bricks and masonry. Works to historic fabric will be carried out in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR. With mitigation, the impact magnitude is reduced from Medium to Low. The predicted residual impact is Direct, Negative, Slight and Temporary.

- iv. Replace the 3 car parking spaces in front of Numbers 266 – 270 Merrion Road with an outbound stop, retaining the two mature trees, and possibly remove the outbound stop south of Merrion Gates

A review of the locations of the existing Dublin Bus stops was carried out and is contained in Appendix H to the Preliminary Design Report. The purpose of this process was to review the locations of the existing Dublin Bus stops and to determine whether a stop should be removed, relocated or remain where is. This exercise was carried out to optimise the performance of the bus services on the Proposed Scheme by reducing the journey time of the bus service, increasing the walking catchment of the bus stops and ensuring that key trip attractors located along the route are sufficiently covered within the catchment of bus stops. In a number of locations, existing and proposed bus stops were therefore rationalised based on best practice principles related to bus stop placement. The outcome of this study was to develop a more efficient route which would attract more passengers by creating a wider population catchment and offer a shorter journey time to destinations.

The main principles considered as part of the review were as follows:

- Aim to achieve a bus stop spacing of 400m in suburban locations, and 250m in urban centres;
- Locate bus stop to nearest junction / pedestrian crossing;
- Locate bus stop downstream of junction rather than upstream;
- Consider space requirements to provide bus stop including shelter, waiting area, cycle lane and footpath provision and information displays;

- Review existing and proposed boarding & alighting volumes to determine the size of the bus stop; and
- Consider the potential for interchange with orbital bus services proposed as part of the New Dublin Bus Network.

The above principles were considered to determine whether a bus stop should remain as is, or relocated or be removed.

In terms of the bus stop proposed to the south of Strand Road, this aligns with each of the principles noted above fully meeting the needs of the proposed scheme and operation of services along it.

The submission notes concern around pedestrian safety at the existing junction citing this makes the proposed bus stop location unsuitable. However, the Proposed Scheme would provide significant safety enhancements for pedestrians at this junction including:

- A more compact junction layout with tighter corner radii to reduce vehicular speeds;
- Removal of the slip lane for traffic merging from Strand Road;
- A new pedestrian crossing across Strand Road with a shorter crossing distance than present.

A qualitative assessment of the improvements to pedestrian and cycle facilities at each junction has been undertaken. As can be seen in table 6.29 of Chapter 6 of the EIAR, the proposed improvements at the Strand Road junction would increase from LoS C to LoS B indicating a positive moderate effect at this location. Similarly, an assessment of the cycling infrastructure, which is assessed on a sectional basis, shows that the level of service for cyclists along the section between Strand Road and Nutley Lane would increase from LoS C to LoS B.

The proposed bus stop location, in combination with the proposed upgrade to the Merrion Road/Strand Road junction is considered to represent an appropriate solution in this area.

- v. Retain the IMCO concrete seats, ideally in their current location, but if that is not feasible in a suitable adjacent location.

Chapter 16 (Architectural Heritage) of the EIAR has considered the potential architectural heritage impacts associated with the Construction and Operational Phases of the Belfield / Blackrock to City Centre Core Bus Corridor Scheme. Section 16.3.1.10.3 of this document describes the Statuary and Miscellaneous Street Furniture including the three mid-20th century concrete benches. Table 16.14 of this document classifies these benches as 'local importance, low sensitivity'.

Section 16.5.1.7.3 states the following:

'Three concrete benches (CBC1415BTH087 to CBC1415BTH089) located at the former Swiftcall Centre and at an office block will be removed to accommodate a proposed land take and changes in the alignment of the footpaths to accommodate the proposed bus and cycle lanes on Merrion Road. The pre-mitigation Construction Phase impact is Direct, Negative, Slight and Long-term. Given the benches will not be reinstated, the residual impact is predicted to be Direct, Negative, Slight and Long-term. The removal of the benches does not represent a significant loss of architectural heritage.'

4.65 65 – Moore Maura and O’Reilly Joseph

4.65.1 Submission – Pembroke Road

This submission objected to the proposals at Pembroke Road and raised the following issues:

- i. Non-statutory consultation process;
- ii. Proposals will negatively affect the ambience and heritage of the area and therefore discourage pedestrians walking towards the Aviva or RDS and likewise discourage international tourists from visiting;
- iii. Change to commuting patterns due to Covid-19 and embrace of remote hybrid working;
- iv. Donnybrook and Leeson Street is a more direct route from UCD, likewise, Northumberland Road is a more suitable route into the City Centre from Blackrock.
- v. Safety implications of parking protected cycle lanes and general safety concerns associated with increased cyclist volumes.

4.65.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.2.3 of this report.

4.66 66 – Moran Pádraig

4.66.1 Submission – Whole Scheme

This submission raised the following potential issues:

- i. Traffic impacts

The submission raises a number of issues related to traffic impacts including:

- Impact of reduction in traffic lanes in some areas such as Merrion Road between Monkstown Road and Booterstown Avenue, Pembroke Road and removal of merge lane for traffic turning left from Strand Road to Merrion Road
- Removal of slip lanes at Frascati Road/Rock Road junction and Pembroke Road/Lansdowne Road
- Impact on emergency vehicle access to SVUH as a result of traffic congestion

- ii. Impact of Bus Gate on Traffic Routing

The submission states that the bus gate will have a detrimental impact on the surrounding roads due to rerouting of traffic.

- iii. Impact on Baggot Street businesses

The submissions states that the proposals will have an impact on businesses in the Baggot Street area.

4.66.2 Response to submission

- i. Traffic impacts across the scheme

As set out in the EIA Volume 2 - Main Chapters, Diagram 6.1 and Diagram 6.3 of Chapter 6 Traffic & Transport, people movement is a key design philosophy that

underpins the objectives of the Proposed Scheme. People Movement is the concept of the optimisation of roadway space and / or the prioritisation of the movement of people over the movement of vehicles along the route and through the junctions along the Proposed Scheme. The aim being the reduction of journey times for higher person carrying capacity modes (bus, walking and cycling), which in turn provides significant efficiencies and benefits to users of the transport network and the environment. As such, a multifaceted approach has been undertaken to assess the people movement throughout the Proposed Scheme.

Given the proposed amendments to the pedestrian, cycling, bus and parking / loading infrastructure, the Proposed Scheme will have greater capacity to facilitate movement of people travelling along the corridor. A quantitative impact assessment has been undertaken using outputs from the NTA's ERM and LAM, comparing the Do Minimum and Do Something peak hour scenarios for each forecast year (2028, 2043). The results of the assessment demonstrate that there will be an increase in the number of people travelling along the corridor by sustainable modes of 86% and 105% during the 2028 AM and PM Peak respectively. During the 2043 scenario there will be an increase of 113% and 107% in the number of people travelling along the Proposed Scheme by sustainable modes during the AM and PM Peak Hours respectively. The analysis also shows that there will be an increase of 11.3% and 12.3% of bus boarders during the 2028 AM and PM Peak Hours respectively. During the 2043 scenario there will be an increase of 16% and 18% in bus boarders during the AM and PM Peak Hours respectively. Overall, it is anticipated that the increases to the total number of people travelling through the Proposed Scheme will have a High Positive impact.

To give an overview of how the Proposed Scheme will impact on bus journey times along the corridor, outputs for the B3 service, which traverses the largest extent of the Proposed Scheme (Sections 1-4), have been extracted from the model and are presented in chapter 6.4.6.2.5.2 which states that the Proposed Scheme will deliver average inbound journey time service bus passengers of up to 6.6 minutes (20 %) in 2028 (AM) and 5.2 minutes (16 %) in 2043 Furthermore, results presented in Diagram 6.15 suggest an improvement in bus journey time reliability. Based on the AM and PM peak hours alone, this equates to 8.2 hours of savings in 2028 and 7.6 hours in 2043, when compared to the Do Minimum combined across all buses. On an annual basis this equates to approximately 6,200 hours of bus vehicle savings in 2028 and 5,700 hours in 2043, when considering weekday peak periods only. Journey time variation and reliability are shown to improve in all Do Something scenarios compared to the Do Minimum. Overall, it is anticipated that the improvements to the network performance indicators for bus users along the Proposed Scheme will have a High Positive impact.

In addition to quantitative assessment summarised above, a qualitative assessment of the improvements to pedestrian and cycle facilities at each junction has been undertaken. In relation to pedestrian facilities the results of this assessment demonstrate that across the scheme the Level of Service (LoS) for pedestrians in the Do Minimum (existing infrastructure) scenario is typically of D/E rating. In the Do something (Proposed Scheme) scenario this LoS typically increases to a A/B rating. Similarly for cyclists, the Do Minimum scenario is typically a C/D rating increasing to a A/B rating upon completion of the Proposed Scheme.

In terms of the removal of slip lanes, "DMURS" is The Design Manual for Urban Roads and Streets (Government of Ireland 2013) and is the key design guidance relevant for the Proposed Scheme. Section 4.4.3 of DMURS relates to junction design and sets out how junction design is largely determined by volumes of traffic and while the design of junctions has traditionally prioritised motor vehicle movement, designers must take a more balanced approach to junction design in order to meet the objectives of Smarter Travel and DMURS.

Specifically, DMURS states that designers should, inter alia, “Omit left turn slips, which generally provide little extra effective vehicular capacity but are highly disruptive for pedestrians and cyclists. Where demand warrants, they may be replaced with left turning lanes with tighter corner radii”.

In addition, the NTA’s Draft GDA Transport Strategy (GDATS) 2022 – 2042 identifies a range of measures to achieve the aims of the Draft GDATS, as noted in Table 3.7 of Appendix A2.1 Planning Report of EIAR Chapter 2 Need for the Scheme. Measure WALK3 relates to Improved Junctions and sets out how the NTA, in conjunction with local authorities, will implement junction improvements across the GDA to, inter alia, enhance movement by pedestrians and cyclists via a programme of removal of slip lanes at appropriate locations, together with consideration of junction signalling changes to better balance the use of the junction between motorised and vulnerable modes.

It is clear from the above that the retention of the left turn slip lanes would be contrary to the requirements of DMURS. In relation to achieving the scheme objectives the removal of left turn slip lanes is essential to achieving the necessary enhanced pedestrian, cyclist, and bus priority infrastructure.

In terms of emergency vehicle access SVUH, the submissions states that the increases in congestion will hamper access to the hospital. However, it is noted that emergency vehicles will be able to use bus lanes to access the hospital avoiding any congestion that may be present along the scheme.

ii. Impact of Bus Gate on Traffic Routing

Detailed responses to the issues raised by this submission have been provided in Section 2.2.3 of this report.

iii. Impact on Baggot Street businesses

Detailed responses to the issues raised by this submission have been provided in Section 2.3.3 of this report.

4.67 67 – Morris Mary

4.67.1 Submission - Baggot Street Upper

The document received as part of this submission included an incomplete document which appeared to include only the last sheet. From the information available the submission refers to Baggot Street Upper and raised the following issues:

- i. Northumberland Road / Mount St is a more suitable route, current proposals will impact the Georgian Streetscape of Pembroke Road and Baggot Street;

4.67.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.3.3 of this report.

4.68 68 – Morris Mary Ballyfermot

4.68.1 Submission – Baggot Street Upper

This submission objected the proposals at Baggot Street and raises the following issues:

- i. On street parking and loading;

- ii. Pedestrian crossing and implications to vulnerable road users;
- iii. Absence of demand for proposed bus frequencies;
- iv. Northumberland Road / Mount St is a more suitable route, current proposals will impact the Georgian Streetscape of Pembroke Road and Baggot Street;
- v. Proposals to remove right turn onto Upper Baggot Street from Mespil Road will prove harmful to business;
- vi. Proposals for one lane at Haddington Road at Baggot Street Junction will result in congestion;
- vii. Baggot Steet bridge is unsuitable for the proposed volume of traffic; and
- viii. Changes to footpath will damage the ability for business to operate and hinder access

4.68.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.3.3 of this report.

4.69 69 – Mulligan Paddy

4.69.1 Submission – Baggot Street Upper

Submission objected to the proposals at Baggot Street Upper and raised the following issues:

- i. The proposed route serves the same catchment area as the Dart;
- ii. Route through Donnybrook and Leeson Street is the more direct route from UCD to the City Centre;
- iii. Northumberland Road / Mount St is a more suitable route, current proposals will impact the Georgian Streetscape of Pembroke Road and Baggot Street;
- iv. Traffic restrictions onto Baggot Street Upper and reducing the number and on-street parking will be detrimental to businesses in the area.
- v. Location of proposed loading bays on Wellington Road and Eastmoreland Place will inadequately serve the businesses they intend to.

4.69.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.3.3 of this report.

4.70 70 – Mulligan Susan and Cyril

4.70.1 Submission – Pembroke Road

Submission objected to the proposals at Baggot Street Upper and raised the following issues:

- i. Reduction of loading bays and on-street parking on Baggot Street Upper and Pembroke Road will relocate parking onto Raglan Road and Wellington Road causing a shortage of parking for residents on those streets.
- ii. Removal of trees and the adverse impact on the streetscape ambience; and

- iii. Northumberland Road / Mount St is a more suitable route, current proposals will impact the

4.70.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.3.3 of this report.

4.71 71 – Nolan Bill and Margaret

4.71.1 Submission – Nutley Lane

This submission objects to certain aspects of the proposals at Nutley Lane and raised the following issues:

- i. Additional traffic lanes for private vehicles and the associated carbon emissions;
- ii. Consideration of alternative options;
- iii. Environmental Impact Assessment for Nutley Lane;
- iv. Proposals to replace existing boundary fence at Elm Park with a concrete wall;
- v. Removal of trees and hedges as part of the preferred option; and
- vi. Visual quality of streetscape.

4.71.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.1.3 of this report.

4.72 72 – Nutley’s Resident’s Association

4.72.1 Submission – Nutley Lane

This submission strongly objects to Nutley Lane being developed into a four lane highway, as part of the proposal.

Observations were made on the following items:

- i. Object to the scheme being referred to as simply a 'road development';
- ii. 4 lane highway will sever the golf club and Nutley Park from the rest of the Nutley Community;
- iii. Scheme would destroy the residential nature of Nutley Lane;
- iv. Loss of parking will put pressure and congestion on surrounding streets. A traffic management plan for the area should have been prepared. Currently traffic on Nutley Lane is at a standstill and ambulances need to use it.
- v. The scheme does nothing to relieve congestion on Nutley Lane;
- vi. loss of trees will forever impact the visual and amenity value of the urban landscape;
- vii. Scheme will create many conflict points for residents existing / entering houses, side roads and other premises;

- viii. Increased noise, nuisance, pollution, vibration created by major traffic route. Also profound impact on properties in terms of excavations, disposal of waste from construction, potential alteration of the underlying hydrology and consequential effects on structural stability and construction traffic;
- ix. No evidence that the scheme will take a single car off the road. No impact for commercial traffic and those whom a car is essential and those who have to drive to the hospital;
- x. potentially catastrophic impact on property values on houses on Nutley Lane;
- xi. Submission states that a change to the scheme was not subject of any public consultation and calls into question the whole scheme. Change of the cycle track at Stillorgan Rd end of Nutley will now be outside entrances to 8 houses where as if it was on the RTE side, it wouldn't pass any house;
- xii. Covid has changes needs and transport demand, remote working;
- xiii. No proposals for Nutley Lane were included in the GDA Transport Strategy 2016 – 2035;

4.72.2 Response to submission

- i. Object to the scheme being referred to as simply a 'road development'

Section 1.5.4 of Chapter 01 of the EIAR confirms that Section 50(1)(a) of the Roads Act states that 'A road development that is proposed that comprises any of the following shall be subject to an environmental impact assessment:

- The construction of a motorway;
- The construction of a busway;
- The construction of a service area;
- Any prescribed type of road development consisting of the construction of a proposed public road or the improvement of an existing public road'.

- ii. 4 lane highway will sever the golf club and Nutley Park from the rest of the Nutley Community

Paragraph two of Section 11.4.4.3 of Chapter 11, Human Health, of the EIAR states that '*Studies show that there is an inverse relationship between the average number of social contacts people in a residential street have and the volume of traffic (see Section 11.3.4 for supporting evidence). Reduced through-traffic would reduce actual and perceived community severance and support more social interaction. There are limited studies that demonstrate measurable short or long-term health outcomes from reduced community severance. However, there is substantial evidence of the importance of social contacts to improved health outcomes (Mindell and Karlsen 2012)*'.

Table 6.65 of Chapter 06 (Traffic & Transport) of the EIAR shows that the Local Area Model (LAM) indicates that Nutley Lane will experience a reduction in traffic during the 2028 Opening Year scenario.

- iii. Scheme would destroy the residential nature of Nutley Lane

Paragraph two of Section 11.4.4.3 of Chapter 11, Human Health, of the EIAR states that '*Studies show that there is an inverse relationship between the average number of social contacts people in a residential street have and the volume of traffic (see Section 11.3.4 for supporting evidence). Reduced through-traffic would reduce actual and perceived community severance and support more social interaction. There are limited studies that demonstrate measurable short or long-term health outcomes from reduced community*

severance. However, there is substantial evidence of the importance of social contacts to improved health outcomes (Mindell and Karlsen 2012)'.

Table 6.65 of Chapter 06 (Traffic & Transport) of the EIAR shows that the Local Area Model (LAM) indicates that Nutley Lane will experience a reduction in traffic during the 2028 Opening Year scenario.

- iv. Loss of parking will put pressure and congestion on surrounding streets. A traffic management plan for the area should have been prepared. Currently traffic on Nutley Lane is at a standstill and ambulances need to use it

A Parking Survey Report is included in Appendix G to the Preliminary Design Report. Chapter 7 of this report deals with parking impact on Nutley Lane. Section 7.2.1 of this report states the following: *'All parking and loading facilities will be removed along Nutley Lane, due to the proposed bus lanes and cycle tracks along the corridor. Along with 5 spaces being removed outside the Merrion Shopping Centre, a two-way cycle track on the southwest bound lane of Nutley Lane is proposed and therefore will require removal of 39 spaces.'*

The large trip attractors on Nutley Lane such as St. Vincent's University Hospital , RTE Studios, Elm Park Golf and Sports Club and the Merrion Shopping Centre all currently have off-street parking on each of their sites. Overall, it is anticipated that more efficient use of off-street parking supply and some contained use of on-street parking on local side roads will provide a robust and adequate parking provision for this area into the future.'

- v. The scheme does nothing to relieve congestion on Nutley Lane

Table 6.65 of Chapter 06 (Traffic & Transport) of the EIAR shows that the Local Area Model (LAM) indicates that Nutley Lane will experience a reduction in traffic during the 2028 Opening Year scenario.

- vi. Loss of trees will forever impact the visual and amenity value of the urban landscape

Chapter 17, Landscape (Townscape) & Visual of the EIAR has considered the potential landscape and visual impacts associated with the Construction and Operational Phases of the Proposed Scheme. Table 17.7 classifies the significance and quality of Townscape /Streetscape /Visual Effects / Effects of the proposed changes to the Townscape and Streetscape Character of Nutley Lane to be Negative, Significant / Very Significant and Temporary / Short-Term.

- vii. Scheme will create many conflict points for residents existing / entering houses, side roads and other premises

Table 6.65 of Chapter 06 (Traffic & Transport) of the EIAR shows that the Local Area Model (LAM) indicates that Nutley Lane will experience a reduction in traffic during the 2028 Opening Year scenario.

- viii. Increased noise, nuisance, pollution, vibration created by major traffic route. Also profound impact on properties in terms of excavations, disposal of waste from construction, potential alteration of the underlying hydrology and consequential effects on structural stability and construction traffic

Noise and Vibration

Chapter 09 (Noise & Vibration) of the EIAR has considered the potential noise and vibration impacts associated with the Construction and Operational Phases of the Belfield / Blackrock to City Centre Core Bu Corridor Scheme. Section 9.6.1 of this document states the following:

'Once the various mitigation measures are put in place, noise impacts associated with the Construction Phase will be negative, not significant to slight, temporary impact during all key construction phases, with the exception of road widening and utility works which are negative, slight to moderate and temporary within 15m distance to the works during daytime periods.

During evening periods, noise impacts associated with the Construction Phase will be of negative, not significant to slight, temporary impact during general road works, Bus Gate, urban realm, boundary treatment, retaining wall works and additional works identified at distances greater than 15m from the works. During this period, noise impacts associated road widening and utility diversion works will be of negative, moderate to significant, temporary impact at distances between 15m to 20m from the works. At distances within 10m of road widening / utility diversion and retaining wall works, the noise impact is negative, significant to very significant and temporary. As per DMRB Noise and Vibration (UKHA 2020) in cases of moderate to major magnitude of impacts, the duration of works determines the overall significance rating. As part of the mitigation measures, the durations advised in the DMRB Noise and Vibration (UKHA 2020) will be followed, where feasible, to reduce overall significance effects (i.e. scheduling works to occur for periods of less than ten days/nights over 15 consecutive day/night periods and less than 40 days over six consecutive months where significant effects are identified). Once the CNL (Construction Noise Levels) and duration of works is considered in line with the DMRB Noise and Vibration (UKHA 2020) all key Construction Phase residual noise levels are not significant, whilst meeting the scheme objectives set out in Chapter 1 (Introduction).

Once operational, there will be a positive to neutral direct impact along the Proposed Scheme due to a reduction in traffic volumes during both the year of opening and the design year.

There are no significant residual Operational Phase noise or vibration impacts associated with the Proposed Scheme, whilst meeting the scheme objectives set out in Chapter 01 of the EIAR.

Air Quality

Chapter 07 of the EIAR has considered the potential air quality impacts associated with the Construction and Operation Phases of the Belfield / Blackrock to City Centre Core Bus Corridor Scheme. Section 7.6.1 of this document states: *'overall, it is considered that the residual effects as a result of the Proposed Scheme's construction are neutral and short-term. No significant residual impacts have been identified during the Construction Phase of the Proposed Scheme, whilst meeting the scheme objectives set out in Chapter 1(Introduction)'*.

Section 7.6.2 states: *'The air dispersion modelling assessment has found that the majority of all modelled receptors are predicted to experience negligible impacts due to the Proposed Scheme, and beneficial impacts are also estimated along the length of the Proposed Scheme. Overall it is considered that the residual effects as a result of the Proposed Scheme's operation are neutral and long-term.'*

Water Quality

Chapter 13 of the EIAR has assessed the impact of the Belfield / Blackrock to City Centre Core Bus Corridor Scheme on the surface water environment during the Construction and Operation Phases.

Section 13.6.3.2 of this document concludes: *'Considering all requirements for compliance with the WFD (Water Framework Directive), the Proposed Scheme will not cause a deterioration in status in any water body, not prevent it from achieving GES (Good Ecological Status) or GEP (Good Ecological Potential). There are no cumulative*

impacts with other Schemes, and it complies with other environmental legislation. It can be concluded that the Proposed Scheme complies with all requirements of the WFD.'

- ix. No evidence that the scheme will take a single car off the road. No impact for commercial traffic and those whom a car is essential and those who have to drive to the hospital

Chapter 06 (Traffic & Transport) of the EIAR has considered the potential traffic & transport impacts associated with the Construction and Operational Phases of the Belfield / Blackrock to City Centre Core Bus Corridor Scheme.

Table 6.65 of this document shows that the Local Area Model (LAM) indicates that Nutley Lane will experience a reduction in traffic during the 2028 Opening Year scenario.

- x. Potentially catastrophic impact on property values on houses on Nutley Lane

Chapter 10 (Population) of the EIAR has considered the potential community and economic impacts on the human population associated with the Construction and Operational Phases of the Belfield / Blackrock to City Centre Core Bus Corridor Scheme. Appendix A10.2 to this document assesses the economic impact of the Core Bus Corridors. Section 3 of this appendix concludes that: *'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.'*

- xi. Submission states that a change to the scheme was not subject of any public consultation and calls into question the whole scheme. Change of the cycle track at Stillorgan Rd end of Nutley will now be outside entrances to 8 houses where as if it was on the RTE side, it wouldn't pass any house

As part of the Preliminary Design of the Proposed Scheme, consideration has been given to the potential coordination required in relation to other schemes within the BusConnects CBC Infrastructure Works. This section outlines potential interactions of the Proposed Scheme with adjacent scheme(s) and identifies any procedures within the construction strategies that may be required in order to account for various sequencing scenarios in the construction of the schemes.

The closest such scheme to the Proposed Scheme is the Bray to City Centre CBC Scheme, with which the Proposed Scheme interacts at the signalised junction of the R138 Stillorgan Road and Nutley Lane (henceforth referred to as the subject junction).

The BCID Infrastructure Team has coordinated the design tie-ins to ensure a holistic design has been achieved, so that each scheme can be implemented, and integrated, regardless of the sequencing of their construction.

The Proposed Scheme intends to tie-in with the subject junction at the Nutley Lane arm in terms of main carriageway, cycle facilities and footpaths, with some minor interventions required at the junction associated with a new two-way cycle crossing facility. Figure 4.2 shows an extract of the preliminary design of the Proposed Scheme at the subject junction.

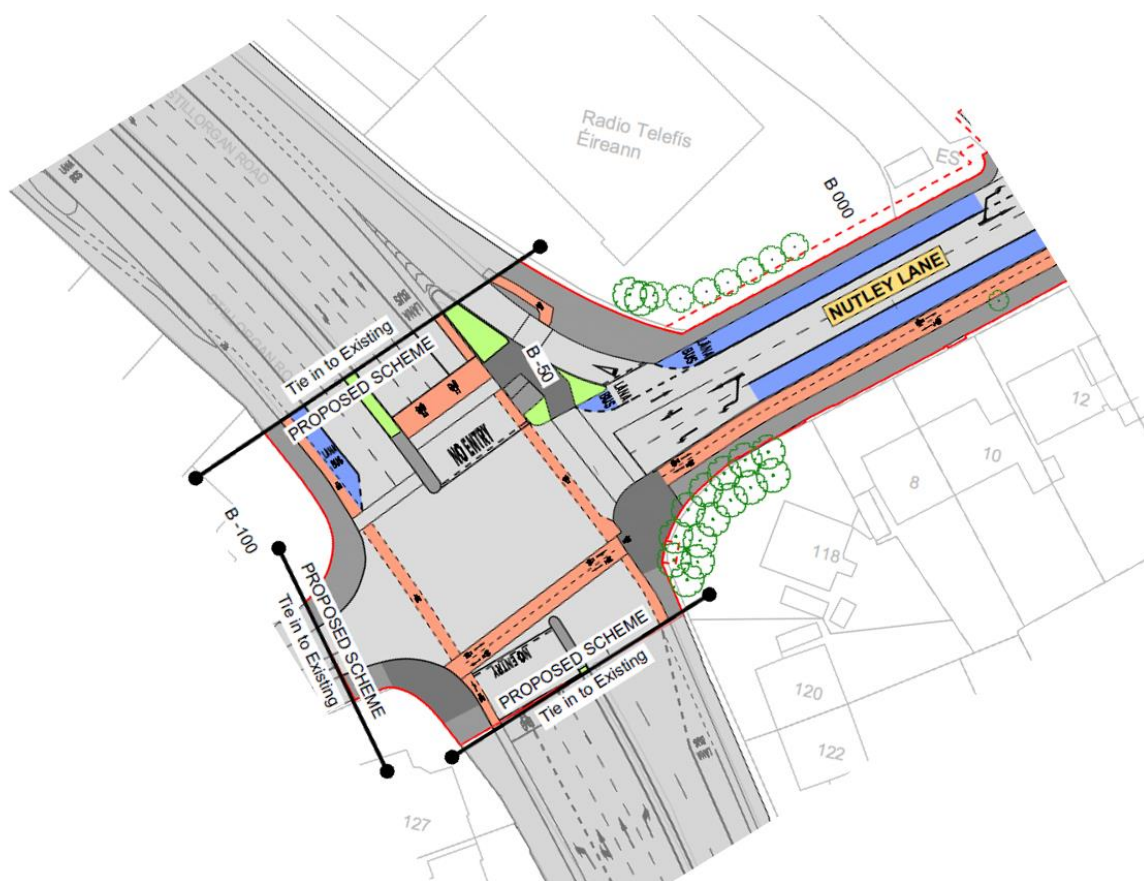


Figure 4.2: Preliminary design of the Proposed Scheme tie-in with the Bray to City Centre Core Bus Corridor Scheme

Consultation

Ireland ratified the Aarhus Convention in June 2012 and it entered into force in Ireland in September 2012. Prior to that ratification, Ireland had to ensure that all the provisions of the Convention were implemented in national law, which took a number of years, and involved over 60 pieces of legislation.

Accordingly, Ireland's obligations under the Aarhus Convention have been fully incorporated into Irish legislation and include rights of access to information on the environment, rights of participation in planning determinations, rights of access to adequate review procedures and various other rights.

These are now statutory provisions, which are binding on all applicable parties.

In relation to transport infrastructure projects, the applicable statutory provisions are set out in the relevant planning and transport legislation, which include requiring major projects to seek planning consent from An Bord Pleanála. Those application processes for large infrastructure schemes provide for a statutory process requiring the making available for public review all of the applicable information set out in the legislation, and permitting the making of submissions in relation to the proposals to the determining body, being An Bord Pleanála. Thereafter, the legislation provides for the holding of an Oral Hearing, enabling direct public engagement and participation in the decision making process.

It should be noted that the advice sought by the Republic of Kazakhstan from the Aarhus Convention Compliance Committee related to the holding of "public hearings". The term "public hearing" is the equivalent of the "Oral Hearing" process conducted by An Bord

Pleanála here in Ireland. This Oral Hearing arrangement is part of the statutory process set out in Irish legislation in fulfilment of its obligations under the Aarhus Convention.

In relation to the three phases of non-statutory consultation referred to in the submission, at that time the Proposed Scheme had not yet progressed to the stage of a planning application to An Bord Pleanála. Instead, the Proposed Scheme was still at the stage of considering various scheme options before finalising a proposal that would then be brought forward for consideration of development consent. As part of the scheme development stage, various non-statutory public consultation processes have been undertaken. These processes are in excess of the requirements of the Aarhus Convention, whose obligations are already enshrined in Irish legislation including “statutory public consultations” which is the stage that the project has now reached.

- xii. Covid has changes needs and transport demand, remote working

Chapter 06 (Traffic & Transport) of the EIAR has considered the potential traffic & transport impacts associated with the Construction and Operational Phases of the Belfield / Blackrock to City Centre Core Bus Corridor Scheme. Section 6.4.6.2.8.1 of this document has addressed the flexibility in working arrangements brought on following COVID – 19 and states:

‘The Proposed Scheme aims to provide an attractive alternative to the private car and promote a modal shift to public transport, walking and cycling. It is, however, recognised that there will be an overall reduction in operational capacity for general traffic along the direct study area given the proposed changes to the road layout and the rebalancing of priority to walking, cycling and bus. This reduction in operational capacity for general traffic along the Proposed Scheme will likely create some level of trip redistribution onto the surrounding road network.

It should be noted that the Do Minimum and Do Something scenarios are based on the assumption that travel behaviour will remain broadly consistent over time and that car demand, used for this assessment, represents a reasonable worst-case scenario. It is possible that societal trends in the medium to long term may reduce car demand further due to ongoing changes to travel behaviours and further shifts towards sustainable travel, flexibility in working arrangements brought on following COVID – 19, and delayed car ownership trends that are emerging.’

- xiii. No proposals for Nutley Lane were included in the GDA Transport Strategy 2016 – 2035

A detailed responses to the issues raised by this submission have been provided in Section 2.1.3 of this report.

4.73 73 – O’Byrne Mark

4.73.1 Submission – Baggot Street Upper

This submission objects to the proposals at Baggot Street Upper and raises the following issues:

- i. Reduction of short-term on-street parking will have a detrimental effect on businesses on Baggot Street Upper;
- ii. Northumberland Road / Mount St is a more suitable route to Merrion Square while Donnybrook and Leeson Street is a more direct route from UCD to the City Centre;
- iii. Prohibiting delivery and service vehicles from stopping on the double yellow line will be catastrophic for local businesses;

4.73.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.3.3 of this report.

4.74 74 – O’Callaghan Elise

4.74.1 Submission – Whole Scheme

This submission raises the following potential issues:

- i. Need for routing of buses along Pembroke Road
- ii. Impact of Pembroke Road bus gate on surrounding roads
- iii. Impact of Covid on traffic/travel patterns
- iv. Impact on heritage boundary and loss of trees at Roly’s Bistro
- v. Interference with the Pembroke Town Hall curtilage and relocation of vehicular access gate
- vi. Removal of Kiosk at the junction of Pembroke Road/Northumberland Road
- vii. Impact on curtilage of 1-11 Pembroke Road, impact on trees and the relocation of the vehicular access
- viii. Cycletrack provision between footpath and parking spaces along Pembroke Road
- ix. Pedestrian crossing needed across Pembroke Road
- x. Removal of Trees on Merrion Road
- xi. Creation of a bus terminus at Merrion Square

4.74.2 Response to submission

- i. Need for routing of buses along Pembroke Road

A detailed response to this issue has been provided in Section 2.2.3 of this report.

- ii. Impact of Pembroke Road bus gate on surrounding roads

A detailed response to this issue has been provided in Section 2.2.3 of this report.

- iii. Impact of Covid on traffic/travel patterns

The following is noted in Section 2.1 of Chapter 2 of the EIAR, in relation to the effect of COVID-19:

“The COVID-19 pandemic brought about a short-term change in travel patterns in the Greater Dublin Area (which led, for example, to fewer people using public transport and more people working from home). Travel demand and patterns of travel have now started to return to pre-pandemic levels and are anticipated to grow in line with population growth. The impacts on travel demand and patterns of travel are still dependent on the quality of the transport system, in particular the reliability of a bus service that is not constrained by general traffic congestion.”

Chapter 06 (Traffic & Transport) of the EIAR has considered the potential traffic & transport impacts associated with the Construction and Operational Phases of the Belfield / Blackrock to City Centre Core Bus Corridor Scheme. Section 6.4.6.2.8.1 of this

document has addressed the flexibility in working arrangements brought on following COVID – 19 and states:

‘The Proposed Scheme aims to provide an attractive alternative to the private car and promote a modal shift to public transport, walking and cycling. It is, however, recognised that there will be an overall reduction in operational capacity for general traffic along the direct study area given the proposed changes to the road layout and the rebalancing of priority to walking, cycling and bus. This reduction in operational capacity for general traffic along the Proposed Scheme will likely create some level of trip redistribution onto the surrounding road network.

It should be noted that the Do Minimum and Do Something scenarios are based on the assumption that travel behaviour will remain broadly consistent over time and that car demand, used for this assessment, represents a reasonable worst-case scenario. It is possible that societal trends in the medium to long term may reduce car demand further due to ongoing changes to travel behaviours and further shifts towards sustainable travel, flexibility in working arrangements brought on following COVID – 19, and delayed car ownership trends that are emerging.’

In summary it is considered that the traffic assessment contained in the EIAR, and the traffic data upon which it is based (collected pre-covid pandemic), represents a reasonable basis for the assessment.

iv. Impact on heritage boundary and loss of trees at Roly’s Bistro

A detailed response to this issue has been provided in 3.2.23 of this report.

v. Interference with the Pembroke Town Hall curtilage and relocation of vehicular access gate

In order to facilitate a safer junction for all users but in particular pedestrians and cyclists, it is proposed to relocate the existing vehicular entrance to the CDETB (formerly Pembroke Town Hall) from its current location to along Anglesea Road. This proposal facilitates the removal of the left turn slip in line with DMURS guidance which states, “Omit left turn slips, which generally provide little extra effective vehicular capacity but are highly disruptive for pedestrians and cyclists”. The removal of the slip lane also facilitates a more compact junction arrangement with more suitable pedestrian and cycle crossings along the desire line. Under this arrangement, it would not be possible to retain vehicular access to the property at this location.

It is noted that the Proposed Scheme does not propose any changes to the existing entrance other than the positioning of a bollard in the middle to prevent vehicular access. It is noted that access will still be possible at this location for pedestrians and cyclists.

In order to facilitate the new location on Anglesea Road, the internal roadway arrangement, including the parking and footpath will be reconfigured. The proposed vehicular access will be located at an existing pedestrian gate. A railing, approximately 6m in length and an existing pedestrian gate and pier will be removed, to facilitate the proposed vehicular access / egress. The new internal roadway will require full depth construction of new pavement along with construction of new kerbs throughout the existing grassed area within the property.

With respect to the impact of this proposal on Architectural Heritage, Chapter 16 of the EIAR states the following:

Two further locations were identified where it is proposed that access, egress and gates to protected structures will be altered. These include the relocation of the vehicular entrance gate to the former Pembroke Town Hall (DCC RPS 5084) to Anglesea Road and relocation of the existing egress from 1 Pembroke Road (DCC RPS 6552) onto

Waterloo Road. The existing gate will be retained as a pedestrian entrance. The pre-mitigation Construction Phase impact is Negative, Moderate and Permanent. The mitigation is for recording and labelling the affected sections of the boundary treatments in detail prior to the commencement of construction works. The existence of a pedestrian gates in the location of the proposed vehicular entrances will help mitigate the loss of historic fabric as the existing gates will be adapted. The existing gates are to be taken down along with the end posts, sections of railing and plinths. The north end post to the pedestrian gate on Anglesea Road will be retained in position. Removed sections of historic fabric are to be stored safely for reuse. The southern end posts are to be reinstated in the widened entrances. The removed railings will be adapted to form gates to match the existing pedestrian gates. The existing and new gates will be reinstated. Historic fabric which is not directly affected by the proposed landscaping works or works to the gates, such as adjoining sections of railing, or other architectural heritage features will be protected during the course of works. The kerbs or edging to the flower beds will be recorded and labelled before being carefully removed by the appointed contractor and stored for reuse in the proposed landscaping. Recording is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor. The architectural heritage specialist will oversee the labelling, taking-down and reinstatement of the affected gates, railings, piers, bricks and masonry. Works to historic fabric will be carried out in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR. The resulting vehicular entrances with double leaf gates will retain much of the existing historic fabric and will be in keeping with the Protected structures and the adjoining streetscapes. The reinstatement of historic fabric will reduce the magnitude of impact from Medium to Low. The predicted residual impact is Direct Negative, Slight and Long-term.

vi. Relocation of Kiosk at the junction of Pembroke Road/Northumberland Road

The submission notes an objection to the relocation of the Kiosk at the junction of Pembroke Road/Northumberland Road. It is noted that the Kiosk is being retained only 10m from its current location and will be restored with full services to allow it to operate as normal in future.

Chapter 16 of the EIAR states the following with respect to the impact on the Kiosk:

A kiosk, and railings to the pocket park (CBC1415BTH198) on the corner of Pembroke Road and Northumberland Road will be repositioned to accommodate the proposed changes in the alignment of the road, footpaths and cycle track and proposed urban realm works. The kiosk and pocket park are of Local Importance and Low Sensitivity. There is potential for damage of the sensitive fabric during its removal, transport, storage, and reassembly. The pre-mitigation Construction Phase impact is Direct, Negative, Moderate and Temporary. Mitigation is recording of the kiosk and railings and component parts prior to the commencement of works, labelling the affected fabric prior to its careful dismantling and removal to secure storage for the duration of the works. Recording is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor. The architectural heritage specialist will oversee the labelling and taking-down of the kiosk and railings by the appointed contractor. The present railings form one continuous border to the pocket park. Given a pedestrian path through the reconfigured pocket park is proposed, it will be necessary to reinstate the railings in two separate sections, thus the railings will be cut. This has occurred previously as there is a missing section of railings on the south side of the pocket park. Works to historic fabric will be carried out in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR. The railings are to be reinstated at the edge of the proposed two planted and grassed areas by the appointed contractor. The proposed mitigation works will retain the railings and park and will enhance the character of this junction and the vista up Pembroke Road. This will reduce the magnitude of the risk from High to Low. The predicted residual Construction Phase impact is Direct, Negative, Slight and Long-term

- vii. Impact on curtilage of 1-11 Pembroke Road, impact on trees and the relocation of the vehicular access

A detailed response to this issue has been provided in Section 2.2.3 of this report.

In terms of trees, it is acknowledged that in the Landscape Arrangement Drawings not all trees within the curtilage of 1-11 Pembroke Road have been presented. On these drawings, only trees which have the potential to be impacted by the scheme have been presented and are assessed. As the majority of trees within this particular property sit some distance behind a boundary wall where only minor alterations are required, there is no risk to them being affected by the works and have therefore not been included.

- viii. Cycletrack provision between footpath and parking spaces along Pembroke Road

Section 6 of Appendix A4.1 BusConnects Preliminary Design Guidance Booklet (PDGB) of the EIAR sets out the guidance for the design of parking and loading bays. In this section, parking protected cycle tracks are identified as the preferred layout for provision of cycle facilities adjacent on-street car parking as it affords the most physical protection from passing traffic. It is noted that this arrangement includes a 0.75m buffer between the edge of the parking bay and the edge of the cycle track to facilitate an open door as well as provide some space for car passengers entering/exiting vehicles.

- ix. Pedestrian crossing needed across Pembroke Road

The submission suggests that additional pedestrian crossings should be provided on Pembroke Road. The proposed scheme includes controlled pedestrian facilities at the junction of Pembroke Road/Northumberland Road and at the Pembroke Road/Waterloo Road junctions. As noted in the submission these are located c.500m from each other. However, the proposed bus gate will significantly reduce traffic flows along Pembroke Road to a level that allows safer movement of pedestrians across Pembroke Road without the need for a controlled pedestrian crossing. For this reason, no additional controlled pedestrian crossings were proposed along Pembroke Road but uncontrolled pedestrian crossings can be retained close to where they currently exist.

- x. Removal of Trees on Merrion Road

During the non-statutory public consultation of the Proposed Scheme, the removal of existing mature trees on Merrion Road was identified as a significant concern among members of the public. As such, in the development of the Preferred Route Option, this feedback was taken on board, and where reasonably practicable, healthy, mature trees were retained. Given the size, maturity and overall quality of these trees, and their contribution to the character of the Merrion Road, the Proposed Scheme was designed to retain them where reasonably practicable. This is outlined in Table 4.9 of Chapter 4, where it states that approximately 300m of narrowed cycle track is provided on both sides of the Merrion Road in this area. Providing a standard width would require the demolition of adjacent private properties, result in the loss of a further number of trees, and require additional land acquisition, further impacting a number of adjacent private properties.

EIAR Volume 4 Part 2 Chapter 17 provides the Arboricultural Impact Assessment Report, which includes detailed drawings showing all trees that are to be removed. As summarised in Table 4 of that report, a total of 329 trees will be removed to facilitate the scheme. However, as stated in section 17.4.4.2.9 of Chapter 17, there will be substantial replanting of trees as part of the Proposed Scheme. As stated in section 12.5.1.2.1 of Chapter 5, 349 street trees will be planted throughout the scheme resulting in a net increase of 20 trees.

- xi. Creation of a large bus terminus at Merrion Square

It is noted that while the Belfield/Blackrock to City Centre Core Bus Corridor Scheme terminates at Merrion Square, the bus services using the scheme will not terminate at this location, with the B-Spine continuing out to Blanchardstown. There are however 3 routes which will terminate at Merrion Square (22, 23 and 24) which serve northern parts of the city and which will run at frequencies of 15-20 minutes each. While these routes will terminate at this location, it is not intended that Merrion Square will be used as a layover and terminating buses will almost immediately return to serve their route in the opposite direction. This is therefore not considered to be a major bus terminus.

4.75 75 – O’Leary Pierce

4.75.1 Submission – Baggot Street Upper

This submission raises the following concerns on the proposals at Baggot Street Upper:

- i. Traffic restrictions and reduction to parking at Baggot Street Upper will be detrimental to businesses in the area; and
- ii. Businesses on Baggot Street Upper are not served with off street parking and heavily rely on on-street parking for attracting customers.

4.75.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.3.3 of this report.

4.76 76 – O’Malley John P.

4.76.1 Submission – Nutley Lane

This submission objected the proposals at Nutley Lane and raised the following issues:

- i. Additional lanes and bus traffic will negatively impact the community and residential nature
- ii. Removal of on-street parking and the adverse consequences to property access and congestion on side roads off Nutley Lane
- iii. Access to property;
- iv. Scheme does nothing to relieve existing congestion levels, which will be exacerbated by the new maternity hospital;
- v. Traffic Management Plan for greater Nutley area
- vi. Removal of trees and hedges and impact to environment, visual and amenity value;
- vii. Increase in air and noise pollution
- viii. Property values
- ix. Two-way cycle track alignment and adverse impact to property access

4.76.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.1.3 of this report.

4.77 77 – O’Neill Garrett

4.77.1 Submission – Pembroke Road

This submissions objects to the proposals at Pembroke and raised the following issues:

- i. Proposals to restrict general traffic access onto Pembroke Road will divert traffic onto nearby residential streets impact residential amenity, increase air and noise pollution and create a safety hazard for residents living on these streets.
- ii. Safety implications associated with parking protected parking.
- iii. Impact to visual of historic streetscape from the visual clutter resulting from the parking protected cycle lanes; and
- iv. Entrance to 33 Pembroke Road must be maintained as it serves as a usable entrance.

4.77.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.2.3 of this report.

4.78 78 – O’Shea James

4.78.1 Submission – Baggot Street Upper

This submission raises the following concerns on the proposals at Baggot Street Upper:

- i. The most direct route into the City Centre from UCD is through Donnybrook and Leeson Street, likewise, the most direct route into the city from Blackrock is through Northumberland;
- ii. Restricting access to Baggot Street Upper from the local catchment will be detrimental to local businesses and isolate communities
- iii. Change to commuting patterns due to Covid-19 and remote hybrid working;
- iv. Impact of the proposals on the Georgian streetscape of Pembroke and Upper Baggot Street

4.78.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.3.3 of this report.

4.79 79 – O’Sullivan Cornelius and Mary

4.79.1 Submission – Nutley Lane

This submission raises the following potential issues

- i. That Nutley Lane has the capacity to take 3 traffic lanes and should be configured as follows:
 - a. A dedicated bus lane from Stillorgan Road to Merrion Road;
 - b. A dedicated car lane from Stillorgan Road to Merrion Road;

- c. A shared bus and car lane from Merrion Road to Stillorgan Road, and
 - d. A 2-way cycle lane.
- ii. that the plan before the Bord proposes a road widening for a 4-lane road, with the 'additional' lane primarily to facilitate cars. The construction of this additional lane will give rise to:
 - a. cutting down approximately 75/80 mature trees;
 - b. cutting down 200 metres of 3.5m high evergreen hedge at Elm Park Golf Club boundary;
 - c. cutting down 200 metres of beech hedge at St. Vincent's Hospital boundary; and
 - d. many of the trees to be felled are 30/50 ft high and some at Elm Park Golf Club are in place for over a century.
 - iii. that the level of destruction of the natural environment is contrary to the strategic objectives of BusConnects as it facilitates car traffic.
 - iv. Putting yet another lane on the road will only draw more car traffic and give rise to huge destruction of the natural environment, give rise to growth in car usage leading to increased emissions, health impacts, air/noise pollution and congestion on this residential road. The objective should be to limit car traffic so as to clear capacity for the almost constant stream of ambulances going to/from SVUH.
 - v. Speed/timing is not a critical factor in this leg of the bus route and sharing the third lane is a practical solution.

The submission concludes by recommending that An Bord Pleanála consider conditions in relation to the removal of the existing traffic calming ramps on Nutley Lane, the treatment of the boundary wall at the golf course and questions the proposed removal of the footpath on the golf course side of the road.

4.79.2 Response to submission

- i. Nutley Lane has the capacity to take 3 traffic lanes

Chapter 3 of the EIAR (Consideration of Reasonable Alternatives), outlines the extensive options assessment exercise which has been undertaken to determine the Preferred Route Option for each section of the Proposed Scheme, including Nutley Lane.

In relation to Nutley Lane, from a review of submissions received as part of the first round of non-statutory public consultation for this route, as well as a review of the topographical survey carried out subsequent to the route's publication, a number of issues were identified. The proposed removal of on-street trees and those in front gardens was a significant cause for concern amongst residents.

These issues primarily relate to the section of Nutley Lane between the St. Vincent's University Hospital entrance / Nutley Avenue and the Elm Park Golf and Sports Club entrance due to the number of residential properties fronting onto the north-western side of the road, including a number which were proposed to be subject to land acquisition, and the number of on-street trees.

The Emerging Preferred Route (EPR) Option on Nutley Lane consisted of the two general traffic lanes, two bus lanes, two cycle tracks and two footpaths, from the R138 Stillorgan Road junction to the R118 Merrion Road junction. In order to achieve this, the EPR Option design indicated a loss of existing trees and parking along the length of Nutley

Lane, as well as potential land take on both sides of the road (including a number of front gardens on the north-west side immediately adjacent to Nutley Avenue).

The proposed road alignment was revised to retain the existing kerb line on the residential side, and as such, retaining the existing on-street trees along this footpath, and remove the requirement for land acquisition and tree removal in private residential properties on that side of Nutley Lane.

Section 3.4.1.1.5 of Chapter 3 of the EIAR describes the seven options assessed for Nutley Lane including three lane options along Elm Park Golf and Sports Club. The Preferred Route Option was identified as Option NL2, comprising two bus lanes and two traffic lanes along the majority of Nutley Lane, as well as a two-way cycle track. While other options did perform well under many criteria, the expected impacts in relation to Transport Quality & Reliability and Traffic Network Integration were considerably more than in the preferred option.

A number of the options developed consisted of a three-lane cross section between Nutley Road and St. Vincent's University Hospital, namely options NL4, NL5 and NL7. Each of these options had specific reasons as to why they were not preferred. All three of these options performed poorly under traffic network integration compared to Option NL2 due to detours required for through traffic as a result of the one-way system in option NL4 and the potential queuing and delays as a result of the signal-controlled priority measures in options NL5 and NL7. Each of the three-lane options also performed worse than Option NL2 in terms of Road Safety due to additional interactions required between buses and general traffic. Options NL5 and NL7 performed worse than option NL2 in terms of transport quality and reliability due to a lack of physical bus priority and sharing road space with general traffic.

- ii. Proposed 4-lane road is primarily to facilitate cars

The Proposed Scheme on Nutley Lane includes a bus lane in each direction and a general traffic lane in each direction. The existing layout also includes one general traffic lane in each direction, therefore the provision for private vehicles is proposed to stay the same. The proposed road widening on Nutley Lane is to facilitate new dedicated bus lanes in both directions in addition to a 2-way cycle track, whilst the footpath on the golf course side of the road is proposed to be removed in order to minimise the land take required to deliver these sustainable transport infrastructure improvements.

- iii. The level of destruction of the natural environment is contrary to the strategic objectives of BusConnects as it facilitates car traffic.

Chapter 3 of the EIAR (Consideration of Reasonable Alternatives) outlines the extensive options assessment exercise which has been undertaken to determine the Preferred Route Option for each section of the Proposed Scheme, including Nutley Lane. In relation to Nutley Lane, from a review of submissions received as part of the first round of non-statutory public consultation for this route, as well as a review of the topographical survey carried out subsequent to the route's publication, a number of issues were identified. The proposed removal of on-street trees and those in front gardens was a significant cause for concern amongst residents. These issues primarily relate to the section of Nutley Lane between the St. Vincent's University Hospital entrance / Nutley Avenue and the Elm Park Golf and Sports Club entrance due to the number of residential properties fronting onto the north-western side of the road, including a number which were proposed to be subject to land acquisition, and the number of on-street trees.

The Emerging Preferred Route (EPR) Option on Nutley Lane consisted of the two general traffic lanes, two bus lanes, two cycle tracks and two footpaths, from the R138 Stillorgan Road junction to the R118 Merrion Road junction. In order to achieve this, the EPR Option design indicated a loss of existing trees and parking along the length of Nutley

Lane, as well as potential land take on both sides of the road (including a number of front gardens on the north-west side immediately adjacent to Nutley Avenue).

The proposed road alignment was revised to retain the existing kerb line on the residential side, and as such, retain the existing on-street trees along this footpath, and remove the requirement for land acquisition and tree removal in private residential properties on that side of Nutley Lane.

Chapter 17, Landscape (Townscape) & Visual of the EIAR has considered the potential landscape and visual impacts associated with the Construction and Operational Phases of the Belfield / Blackrock to City Centre Core Bus Corridor Scheme.

Table 17.7 classifies the significance and quality of Townscape /Streetscape /Visual Effects / Effects of the proposed changes to the Townscape and Streetscape Character of Nutley Lane during the Construction Phase to be Negative, Significant / Very Significant and Temporary / Short-Term.

Table 17.10 classifies the significance and quality of Townscape /Streetscape /Visual Effects / Effects of the proposed changes to the Townscape and Streetscape Character of Nutley Lane during the Operational Phase to be Negative, Moderate and Short-Term at 1 year post-construction changing to Negative, Slight / Moderate and Long-Terms at 15 years post-construction. A new hedgerow is proposed on the golf course side of the reinstated boundary to mitigate the loss of the existing hedge and trees in this location.

These impacts have been considered and balanced with the significantly enhanced level of service for public transport and for pedestrian / cycle connectivity along this section of the Proposed Scheme in line with the objectives of the Proposed Scheme.

- iv. The objective should be to limit car traffic so as to clear capacity for the almost constant stream of ambulances going to/from SVUH.

The quantum of general traffic lanes is proposed to stay as per existing ie. One in each direction. The proposed new bus lanes in each direction will be subject to enforcement and general traffic shall not be allowed make use of the bus lanes. At all times including during times of congestion in the general traffic lanes on Nutley Lane, buses, taxis and emergency vehicles will be permitted to use the proposed bus lanes.

- v. Speed/timing is not a critical factor in this leg of the bus route and sharing the third lane is a practical solution.

One of the stated objectives of the Proposed Scheme, as set out in Section 2.1 of Chapter 2 (Need for the Proposed Scheme) of the EIAR is to *'enhance the capacity and potential of the public transport system by improving bus speeds, reliability and punctuality through the provision of bus lanes and other measures to provide priority to bus movement over general traffic movements.'*

The Proposed Scheme infrastructure improvements provide benefits in protecting bus journey time reliability and consistency, as passenger demand continues to grow into the future. This is best achieved with dedicated bus lanes. Sharing lanes between public transport and general traffic is avoided where practicable as part of the proposed Scheme.

As part of the BusConnects revised bus network proposals, the Proposed Scheme will serve the B-Spine bus services. Image 2.7 in Chapter 2 of the EIAR which is reproduced below, is an extract from New Dublin Area Bus Network Map (NTA 2020) and shows the B-Spine interface with the Proposed Scheme between Monkstown Road and Nutley Lane (B3 and B4), along Nutley Lane (B1 and B2), and from Nutley Lane to the City Centre (B1, B2, B3 and B4). It is noted that both the B1 and B2 routes along Nutley Lane are proposed to operate with 15 minute intervals between buses, and the L13 route is

proposed to operate with 60 minute intervals. This equates to 18 buses per hour on Nutley Lane in both directions.

It is further noted that the benefits of the scheme in terms of bus passenger volumes is clearly demonstrated in Chapter 6 of the EIAR. Diagram 6.11 in Section 6.4.6.2.3.1 of the EIAR (reproduced in Figure 4.3 below) presents the passenger loading profile the AM Peak Hour in the inbound direction in 2028.

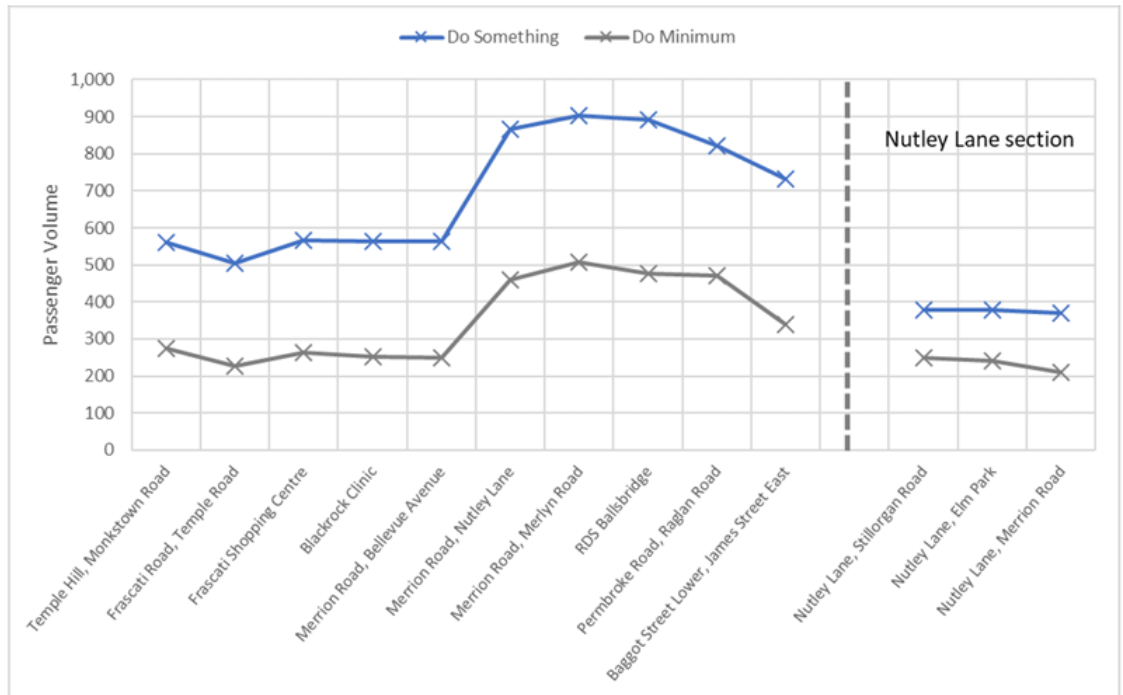


Figure 4.3: 2028 AM Peak Hour Passenger Volume Along Proposed Scheme (inbound direction)

As can be seen in Figure 4.3, a higher level of bus passenger loading can be seen along the Proposed Scheme with c.150-200 additional passengers being carried along Nutley Lane in the AM Peak hour in 2028. This increases to c. 300-350 additional passengers in the AM Peak hour in 2043 as shown in Diagram 6.12 in the EIAR (reproduced in Figure 4.4 below). The substantial increase in passengers using the corridor at this location as a result of the proposed scheme further highlights the need for the scheme along Nutley Lane. It is noted that as outlined in Section 6.3.1 of Chapter 6 of the EIAR, the Do Minimum scenario includes include all other elements of the BusConnects Programme of projects (apart from the CBC Infrastructure Works elements), including the Dublin Area Bus Network Redesign. As such, the benefits outlined below are solely due to the infrastructure improvements proposed under the Proposed Scheme.

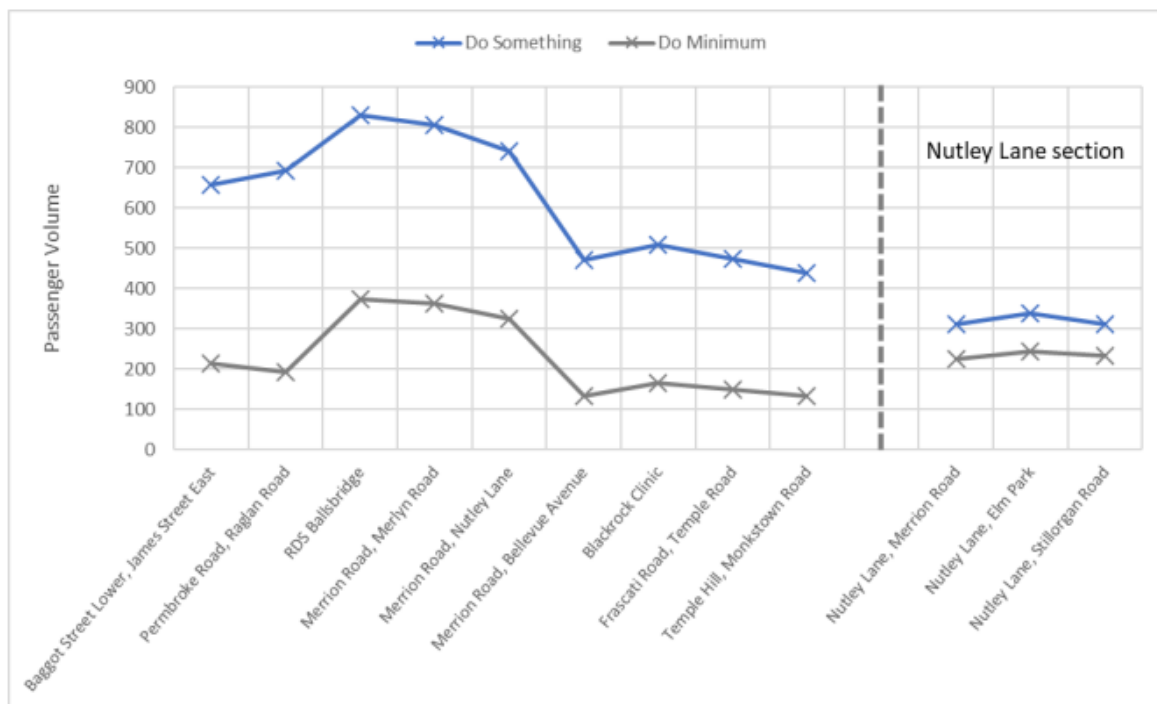


Figure 4.4: 2043 PM Peak Hour Passenger Volume Along Proposed Scheme (outbound direction)

Demand for travel by bus is anticipated to continue to grow in this corridor into the future, in line with population growth. The bus priority measures forming part of the Proposed Scheme are required to accommodate this growth in travel demand and to facilitate the revised bus network (B-Spine) by providing journey time savings and reliability for passengers. This will ensure that the projected growth in passenger demand is facilitated and protected from increasing congestion, providing resilience which can in the future cater for additional bus service provision.

4.80 80 – Owens Dr Rozelle

4.80.1 Submission – Baggot Street Upper

This submission makes the following observation on the proposals at Baggot Street Upper:

- i. Concerned of the impact the proposals will have on the historic streetscape, and local business community of Baggot Street Upper;

4.80.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.3.3 of this report.

4.81 81 – Pembroke Road Association

4.81.1 Submission – Pembroke

This submission raised the following concerns on the proposals at Pembroke Road:

- i. Proposals will have a detrimental effect on the heritage of Dublin Streetscape;
- ii. Northumberland Road / Mount St is a more suitable route, current proposals will impact the Georgian Streetscape of Pembroke Road and Baggot Street;
- iii. MaCartney Bridge is unsuitable to accommodate the proposed frequency of buses and is of historic significance;
- iv. Proposals to amend railing and plinths at properties 1-11 on Pembroke Road will alter the historical identify of the Pembroke District. Scale of tree removal identified in BusConnects drawings does not reflect the actual number of trees that will be impacted;
- v. Display of CPO notices;
- vi. Short-term parking is essential for the viability of businesses in the area. Requirement for short-term parking will increase by the proposals to develop The Royal City of Dublin Hospital.
- vii. The kiosk island continues to function as a rest on a crossing point at a busy junction and is considered a Dublin landmark.

4.81.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.3.4 of this report.

4.82 82 – Quinn James

4.82.1 Submission – Baggot Street Upper & Pembroke Road

This submission objects to the proposals at Pembroke Road and raised the following issues:

- i. The proposals will have a detrimental effect on communities and businesses along Pembroke Road and Baggot Street Upper.

4.82.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.2.4 and Section 2.3.3 of this report.

4.83 83 – Quinn Michael J. & Helen Quinn

4.83.1 Submission – Baggot Street Upper & Pembroke Road

This submissions objects to the proposals at Baggot Street Upper and Pembroke Road and raised the following issues:

- i. Proposals to route the scheme through Pembroke Road and Baggot Street Upper is flawed on the following ground:
- ii. McCartney Bridge is too narrow and of historical importance;
- iii. Increase in bus frequencies will damage Baggot Street Upper and diminish the quality and safety for pedestrians and proposals don't reflect changes to commuting patterns.
- iv. Number of proposed on-street parking and loading bays are insufficient to meet the requirements of traders.

- v. Proposals will diminish the historical streetscape of Pembroke Road and Baggot Street by providing a constant stream of buses;

4.83.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.3.3 of this report.

4.84 84 – Rathgar Residents Association

4.84.1 Submission – Entire Scheme

- i. Alternative solutions would relive impact on the environment

The submission notes a concern of the impact of the proposed scheme on a range of environmental topics considered in the EIAR.

The submission states that an underground metro would have less of an impact on the environment, built heritage and special character. The submission also notes alternative measures that could be implemented quickly such as congestion charging, park and ride facilities and cashless fares.

4.84.2 Response to submission

- i. Alternative solutions would relive impact on the environment

Environmental Impact Assessment is a systematic and an iterative process that examines the potential environmental impacts of a proposed scheme and establishes appropriate design and mitigation measures to avoid, reduce or offset impacts. The impacts noted in the submission are acknowledged in the EIAR and have been mitigated in so far as is reasonably practicable.

In terms of alternative solutions, Chapter 3 of the EIAR sets out the reasonable alternatives studied and the main reasons for the selection of the Proposed Scheme taking into account the effects on the environment. Within this Chapter consideration is given to strategic alternatives including both light rail and metro. Section 3.2.4 of this chapter states that the appropriate type of public transport provision in any particular case is predominantly determined by the likely quantum of passenger demand along the particular public transport route.

For urban transport systems, bus-based transport is the appropriate public transport mode for passenger demand levels of up to 4,000 passengers per hour per direction. (UITP 2009). Light rail provision would generally be appropriate to cater for passenger demand of between 3,500 and about 7,000 passengers per hour per direction. Passenger demand levels above 7,000 passengers per hour per direction would generally be catered for by heavy rail or metro modes, which would usually be expected to serve a number of major origins or destinations along a particular corridor. In the case of both the bus and light rail modes, higher levels of passenger demand than the above stated figures can be accommodated under specific conditions.

The development of the GDA Transport Strategy considered the likely public transport passenger demand levels across the region using the NTA's transport model and took into account the other studies referenced above, in addition to studies that had been carried out to investigate a potential light rail scheme within the area of this corridor. Likely passenger flows were identified to be within the capacity of bus transport, without reaching the quantum of passenger demand which would support the provision of higher capacity rail solutions. Section 3.2.1 set out various studies undertaken for the GDA

Transport Strategy. Arising from these studies and the specific assessment and transport modelling work undertaken for the Strategy, it was concluded that a bus-based transport system would be the proposed public transport solution in the corridor of the Proposed Scheme. The proposed transport solution would be supplemented by the upgrade of the Luas Green line to Metro, to provide more passenger capacity as well as the extension of the Luas Green line from Cherrywood to Bray Town Centre. It was considered that there would be insufficient demand to justify the provision of an additional light rail alternative above what is proposed above, particularly given the low to medium density nature of development in this corridor.

Similar to BRT, environmentally the light rail option compared to the Core Bus Corridor proposal would be more impactful in terms of construction impacts, including flora and fauna, heritage, air and noise. Light rail requires continuous unbroken physical lane infrastructure to achieve high-priority. This would involve significantly more land take and potentially involve demolition of buildings at pinch-points. In the case of the Core Bus Corridor proposals bus-priority can be achieved through short lengths at pinch-points by the use of signal-control priority.

Given the consideration of light rail provision, and the level of likely public passenger use along this overall corridor assessed in the transport modelling work, the development of the GDA Transport Strategy identified that a metro solution would not be economically justified within the area covered by this corridor.

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, nor would it obviate the need to develop the cycling infrastructure required along the route of the Proposed Scheme.

Environmentally the metro option compared to the Core Bus Corridor proposal would be more impactful in terms of construction impacts, including flora and fauna, heritage, air and noise. Metro systems require unbroken physical lane infrastructure to achieve high-priority. This would involve significantly more land take and potentially involve demolition of buildings at pinch-points. In the case of the Core Bus Corridor proposals bus-priority can be achieved through short lengths at pinch-points by the use of signal-control priority.

With respect to congestion charging, section 3.2.7 of the EIAR states that a key success factor of demand management is greater use of alternative travel modes, in particular public transport. In the case of Dublin, the existing public transport system does not currently have sufficient capacity to cater for larger volumes of additional users.

In advance of a significant uplift in overall public transport capacity in the Dublin metropolitan area, the implementation of major demand management measures across that area would be unsuccessful. Effectively constraining people from making journeys by car and requiring them to use other modes, without those modes having the necessary capacity to cater for such transfer, would not deliver an effective overall transport system. Instead, the capacity of the public transport system needs to be built up in advance of, or in conjunction with, the introduction of major demand management measures in the Dublin metropolitan area. This is especially true in the case of the bus system where a major increase in bus capacity through measures such as the Proposed Scheme would be required for the successful implementation of large-scale demand management initiatives.

While the foregoing addresses the dependency of demand management measures on public transport capacity, it is equally correct that the provision of greatly enhanced cycling facilities will also be required to cater for the anticipated increase in cycling numbers, both in the absence of demand management measures and, even more so, with the implementation of such measures. Demand management initiatives by

themselves will not deliver the level of segregated cycling infrastructure required to support the growth in that mode. Consequently, the progression of demand management proposals will not secure the enhanced safe cycling infrastructure envisaged under the Proposed Scheme. Accordingly, the implementation of demand management measures would not remove the need for additional infrastructure to serve the bus transport needs of the corridor covered by the Proposed Scheme, nor would it obviate the need to develop the cycling infrastructure required along the route of the Proposed Scheme.

Finally it is noted that park and ride and cashless fares both form part of the broader BusConnects programme and will be implemented to complement improvements to the overall bus system, including the Proposed Scheme infrastructure.

4.85 85 – Reidy Sarah

4.85.1 Submission – Baggot Street Upper & Pembroke Road

This submission objects to aspects of the proposals at Baggot Street Upper and Pembroke Road and raises the following issues:

- i. Traffic restrictions onto Upper Baggot Street and Pembroke will isolate the community and negatively impact local businesses;
- ii. Reduction of on-street parking and loading facilities will have detrimental effect on business and consequentially divert parking onto Waterloo Road, adding additional stress to parking availability for residents and their visitors; and
- iii. Impact to historic streetscape;

4.85.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in 2.2.3 and 2.3.3 of this report.

4.86 86 – Ross Gráinne

4.86.1 Submission – Baggot Street Upper & Pembroke Road

This submission objects to aspects of the proposals at Baggot Street Upper and Pembroke Road and raises the following issues:

- i. Northumberland Road / Mount St is a more suitable route, current proposals will impact the Georgian Streetscape of Pembroke Road and Baggot Street;
- ii. Reducing on-street parking and restricting access onto Baggot Street Upper will adversely impact businesses and negatively affect the historic neighbourhood;
- iii. Traffic restrictions onto and off Baggot Street Upper will redirect traffic and delivery vehicles onto Eastmoreland Lane causing traffic

4.86.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in 2.2.3 and 2.3.3 of this report.

4.87 87 – Smyth Richie

4.87.1 Submission – Entire Scheme

This submissions raised the following observation on the proposals:

- i. Trees contribute to the character of the city and should be retained as part of the proposed scheme.

4.87.2 Response to submission

- i. Loss of trees

EIAR Volume 4 Part 2 Chapter 17 provides the Arboricultural Impact Assessment Report, which includes detailed drawings showing all trees that are to be removed. As summarised in Table 4 of that report, a total of 329 trees will be removed to facilitate the scheme. However, as stated in section 17.4.4.2.9 of Chapter 17, there will be substantial replanting of trees as part of the Proposed Scheme. As stated in section 12.5.1.2.1 of Chapter 5, 349 street trees will be planted throughout the scheme resulting in a net increase of 20 trees.

It is noted that in many places, the proposed scheme was amended in order to retain existing street trees. For example, during the non-statutory public consultation of the Proposed Scheme, the removal of existing mature trees on Merrion Road was identified as a significant concern among members of the public. As such, in the development of the Preferred Route Option, this feedback was taken on board, and where reasonably practicable, healthy, mature trees were retained. Given the size, maturity and overall quality of these trees, and their contribution to the character of the Merrion Road, the Proposed Scheme was designed to retain them where reasonably practicable. This is outlined in Table 4.9 of Chapter 4, where it states that approximately 300m of narrowed cycle track in provided on both sides of the Merrion Road in this area. Providing a standard width would require the demolition of adjacent private properties, result in the loss of a further number of trees, and require additional land acquisition, further impacting a number of adjacent private properties.

4.88 88 – Starr Vivienne

4.88.1 Submission – Baggot Street Upper & Pembroke Road

This submission raised the following concerns on the proposals at Baggot Street Upper and Pembroke Road:

- i. Retention of accessibility to Pembroke Road and Baggot Street Upper is vital to the local community; and
- ii. Northumberland Road / Mount St is a more suitable route, enabling a more direct route to Merrion Square and lesser environmental impact.

4.88.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in 2.2.3 and 2.3.3 of this report.

4.89 89 – Staunton Sarah

4.89.1 Submission – Whole Scheme

This submission raised the following issues:

- i. The proposals will have a detrimental effect on the historic streetscape of Dublin. Bridge at Baggot Street is a protected structure that should not be developed to preserve its heritage.
- ii. Proposals serve the same catchment area as the DART;
- iii. Proposals will not serve visitors of St. Vincent's University Hospital and the new Maternity Hospital;
- iv. Restricting access onto Pembroke Road will restrict vulnerable users that rely on private vehicles and taxis from accessing amenities on Pembroke Road and Baggot Street Upper;
- v. Change to commuter patterns due to Covid-19;
- vi. Lack of feasibility plan for additional bus depots; and
- vii. Assessment of the Special Area of Conservation (SAC) lacks depth and requires further assessment.

4.89.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in 2.2.3 and 2.3.3 of this report.

4.90 90 – Tarmey Seamus

4.90.1 Submission – Baggot Street Upper & Pembroke Road

- i. Routing of the Proposed Scheme on Pembroke Road and Baggot Street Upper
Objects to proposal for a bus corridor along Baggot Street/Pembroke Road
- ii. Loss of trees

The submission states that the proposal will destroy the streetscape and remove a large number of trees along this road.

4.90.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in 2.2.3 and 2.3.3 of this report

4.91 91 – Taylor Anne-Marie

4.91.1 Submission – Pembroke

This submission objected to the proposals at Pembroke Road and raised the following issues:

- i. Proposals will fundamentally change the character of the Pembroke Road;

- ii. A more suitable and direct route from UCD towards the City Centre is through Donnybrook and Leeson Street; and
- iii. Restricting access onto Pembroke Road and Baggot Street Upper will severely increase commuting times for residents of Pembroke Road, Wellington Lane and Raglan Road. Contributing to an increase in emissions.

4.91.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in 2.2.3 and 2.3.3 of this report.

4.92 92 – Tesco Ireland Limited

4.92.1 Submission – Baggot Street Upper / Merrion Road

It is noted that this submission does not raise an objection to the CPO as proposed but does make the following requests for clarification as follows:

- i. CPO and Potential Impact on Pedestrian Access During Construction

The submission seeks clarification regarding CPO of plot 1004(4).2c at Merrion Shopping Centre and whether the CPO relates to both the ramp and footpath at this entrance to the shopping centre. Clarification is sought as to whether there will be any disruption to the current access arrangements during the works. If impacted, it is noted that this would be disruptive, especially for mobility impaired customers.

The submission also seeks clarification on the timing and duration of the temporary acquisition of the lands.

- ii. Loading Bay Provision and Cyclist Safety at Loading Bay

In relation to the Tesco store on Baggot Street Upper, the submission states that the proposed scheme reduces the availability of loading bays in the immediate vicinity of the store which could have significant impacts on the operation of the store. The proposed loading bay on East Moreland Place is considered to be too far from the store.

The submission also states that there are concerns regarding cyclist and staff safety at the loading bays due to the presence of the cycle track between the loading bay and footpath. Clarification is also sought on whether there will be segregation between the cycle track and loading bay, and if this will be dropped to facilitate deliveries.

4.92.2 Response to submission

This submission was also made in response to the CPO relating to the proposed acquisition of land from the premises. Detailed responses to the issues raised have been provided in Section 3.2.21.

4.93 93 – Tomaz Barbara

4.93.1 Submission – Pembroke Road

This submission raises the following concerns on the proposals at Pembroke Road:

- i. Proposals will turn the area into a bus depot;
- ii. Removal of mature trees;
- iii. Negative impact to businesses in the area;

- iv. Donnybrook and Northumberland Road have well established bus routes

4.93.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in 2.2.3 of this report.

4.94 94 – Tyrell Hugh

4.94.1 Submission – Nutley Lane

This submission strongly supports improvement to public and active transport infrastructure and raises the following observations for Nutley Lane;

- i. Environmental impacts arising from the preferred option;
- ii. Prioritisation of traffic at the expense of pedestrian amenity;
- iii. The preferred option is likely to create an unpleasant environment; and
- iv. Unsatisfactory Cycling Level of Service due to the two-way cycle track and complicated configuration at St. Vincent's Hospital.

4.94.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.1.3 of this report.

4.95 95 – Upper Baggot Street Traders Association

4.95.1 Submission – Baggot Street Upper

This submission is made by the Upper Baggot Street Trader's Association, who represent approximately 80 businesses in the greater Baggot Street areas who believe that the wrong route has been chosen for the Proposed Scheme. The submission highlights the following issues:

- i. The removal of parking and loading bays and the ability to stop in a car on the street;
- ii. The proposed bus gate and the associated rerouting of traffic onto other roads and separation of Pembroke Road and Baggot Street Upper;
- iii. The need for increased bus services;
- iv. The removal of trees or rails and narrowing of footpaths;
- v. The appropriateness of routing of the Proposed Scheme through Baggot Street Upper; and
- vi. The consideration of alternative plans, such as the Newton Plan.

4.95.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.3.3 of this report.

4.96 96 - Eileen Vaughan

4.96.1 Submission – Pembroke Road

This objection raised two potential issues as follows:

- i. Safety as a result of proposals and increased bus numbers

The submission cites concerns that the increase in bus volumes associated with the proposed scheme would endanger residents and visitors to the area.

- ii. Alternative Routing of buses along Northumberland Road

The submission offers an opinion that all modes should not be facilitated on the same corridor suggesting that buses should be routed along Northumberland Road and onwards to the city via Mount Street.

4.96.2 Response to submission

This submission was also made in response to the CPO relating to the proposed acquisition of land from the premises. Detailed responses to the issues raised have been provided in Section 2.3.3 of this report.

4.97 97 - Wappinger Food Corporation Limited

4.97.1 Submission – Ballsbridge

This objection raised two potential issues as follows:

- i. New pergola structure has not been taken into account in the proposed scheme

The submission states that the recently completed pergola structure adjacent Roly's has not been considered in the proposed design. It is suggested that the impact on this land could be avoided by realigning the Herbert Park approach.

It is also noted that the proposed arrangement would result in an impact on the heritage plinth and result in the removal of trees from the area.

- ii. Impact on Biodiversity

The submission states the park adjacent to Roly's supports a habitat of ecological significance, the likes which are commonly used by bats for roosting. The submission notes that no bat surveys were carried out in the vicinity of Roly's Bistro which is a significant omission

4.97.2 Response to submission

This submission was also made in response to the CPO relating to the proposed acquisition of land from the premises. Detailed responses to the issues raised have been provided in Section 3.2.23 of this report.