

Client:

Dún Laoghaire-Rathdown County Council



Project:

Living Streets: Coastal Mobility Route

Report:

Section 38 Report



Document Control Sheet

Client:	Dún Laoghaire-Rathdown County Council
Project Title:	Living Streets: CMR
Document Title:	Section 38 Planning Report
File Name:	22410-BTL-XX-CMR-RP-PM-00147_Section_38_Planning_Report

Document Revision				Document Verification			
Issue Date (DD/MM/YY)	Revision Code	Suitability Code	Author (Initials)	Checker (Initials)	Reviewer As Per PMP (Initials)	Approver As Per PMP (Initials)	Peer Review (Initials or N/A)
15.06.2023	P01	S04	EP		RC	RC	

Table of Contents

	INTRODUCTION	1
	1.1 Objectives	2
	1.2 Report Structure.....	2
	PLANNING PROCESS	3
SECTION 1:	2.1 Section 38	3
	2.2 Documents Prepared.....	3
	2.3 Public Consultation	3
	2.4 Submission Process	3
SECTION 2:	LOCATION, CONTEXT AND SCHEME OVERVIEW	4
	RELEVANT POLICY CONTEXT.....	6
SECTION 3:	4.1 Overview	6
	4.2 European Policy.....	6
SECTION 4:	4.3 National Policy	9
	4.4 Regional Policy	15
	4.5 Local Policy	17
	4.6 Design Guidance	22
	POTENTIAL IMPACTS OF THE SCHEME	23
SECTION 5:	5.1 Design and Visual Impact.....	23
	5.2 Traffic and Transport Assessment.....	23
	5.3 Cultural Heritage (Archaeology and Architectural Heritage)	24
	5.4 Biodiversity, Landscaping and Arboriculture	24
	5.5 Drainage and Utilities.....	24
	5.6 AA Screening	27
SECTION 6:	5.7 EIA Screening.....	27
	CONSULTATIONS AND ALTERNATIVES CONSIDERED	29
	6.1 Consultations	29
	6.2 Alternatives Considered.....	29

INTRODUCTION

On behalf of Dún Laoghaire-Rathdown County Council (DLRCC), Barry's Transportation have prepared this Section 38 Report for the proposed Living Streets: Coastal Mobility Route Scheme (CMR). This is a pedestrian, cycle, public realm and improvement scheme and includes the following roads as well as junctions along the CMR:

SECTION 1:

- Newtown Avenue
- Seapoint Avenue
- Old Dunleary Road
- Crofton Road
- Queen's Road
- Windsor Terrace
- Newtownsmith
- Marine Parade
- Otranto Place
- Sandycove Avenue



Figure 1: Scheme Extents

1.1 Objectives

The proposed scheme will help deliver the following objectives:

- To provide continuous, high-quality, and consistent cycling and walking facilities, including providing a safe and direct route for cyclists between Blackrock Village and the Sandycove.
- To provide improved public realm areas and enhance the overall visual quality the Coastal Mobility Route, including providing attractive seating areas to encourage visitors to the area and to promote social cohesion.
- To provide increased landscaping, planting and SUDS elements to improve the environment.
- To promote modal shift from private vehicle to more sustainable modes including walking, cycling and public transport.
- To create a place for all ages and abilities.
- To enhance safety for all road users including vulnerable persons.

1.2 Report Structure

Following this introductory chapter, the remainder of this report is as follows:

- Section 2 presents an overview of the planning process that the scheme sits within.
- Section 3 presents the location, context, and scheme overview.
- Section 4 presents the relevant policy context.
- Section 5 presents the planning considerations.
- Section 6 details the consultation undertaken with DLRCC, and alternatives considered.

PLANNING PROCESS

2.1 Section 38

SECTION 2: This scheme is being delivered under Section 38 of the Road Traffic Act (1994). Traffic calming and minor road improvements are referred to as a “Section 38” development and the Road Traffic Act, 1994 (as amended) sets out the procedure for carrying out such developments. A road authority may, in the interest of the safety and convenience of road users, provide such traffic calming measures including footpath and cycle track improvements as they consider desirable in respect of public roads in their charge.

2.2 Documents Prepared

The following is a list of documents that have been prepared for this project:

- Site Location Map
- Proposed Layout – Engineer’s drawings
- Proposed Layout - Architect’s drawings and visualisations
- Options Assessment Report
- EIAR Screening Report
- AA Screening Report

2.3 Public Consultation

The Local Authority has decided to proceed with a non-statutory planning consultation held from the 3rd of July to the 11th of August (6 weeks).

2.4 Submission Process

Dún Laoghaire-Rathdown County Council will make full plans and particulars of the proposed development available for inspection. These will be made available at the following locations:

- Dún Laoghaire-Rathdown County Council, County Hall, 1 Harbour Square, Dún Laoghaire, Co Dublin, A96 K6C9

Submissions or Observations can be made online at:

<https://dlrcoco.citizenspace.com/environment/living-streets-coastal-mobility-rout/>

All submissions must include a contact name and address. Any submissions or observations received by the Council will be considered in the Public Consultation Report which will be prepared once the consultation period has ended.

LOCATION, CONTEXT AND SCHEME OVERVIEW

Living Streets CMR is a cycle, public realm and pedestrian improvement project which aims to enhance the attractiveness, liveability, connectivity, and economic vibrancy of the Coastal Mobility Route. The proposed scheme will upgrade the urban realm with new hard and soft landscaping, planting, and street furniture. It will also enhance the pedestrian and cycle infrastructure as well as safety at multiple junctions along the route. The scheme will include works on the following roads:

- Newtown Avenue
- Seapoint Avenue
- Old Dunleary Road
- Crofton Road
- Queen’s Road
- Windsor Terrace
- Newtownsmith
- Marine Parade
- Otranto Place
- Sandycove Avenue



Figure 2: Site Location.

Building on the temporary public realm and mobility improvement measures implemented during the COVID-19 restrictions of summer 2020 along the Coastal Mobility Route, this project will provide a series of permanent public realm, roadway, pedestrian, and cycle upgrades using high quality and durable materials. The scheme is consistent with the policies and objectives of the Interim Dún Laoghaire Urban Framework Plan and the County Development Plan, both of which were informed by extensive public consultation, as

demonstrated in Section 4 below. The scheme is informed by consultation with local representative business and resident groups through two independent evaluations of the temporary measures by TU Dublin; a mobility study (<https://www.tudublin.ie/media/website/news/2021/main-news/TU-Dublin--DLR-COVID-19-Mobility-Review-FINAL-RESIZED.pdf>) and an Economic Development & Business Community Feedback study (https://www.tudublin.ie/media/TU_Ph2a_CovidMob_BusinessCMR_IssDLR0223FI.pdf).

The existing public realm measures, introduced in the summer of 2020, include a one-way traffic system, two-way segregated cycle path, wider pedestrian areas, seating, and planters. Subsequent surveys have shown high levels of support for these temporary measures along the Coastal Mobility Route, with a significant majority of local residents expressing a wish to make these changes permanent. A majority of local businesses have also expressed support for the measures, with some seeking certain design improvements. Dún Laoghaire-Rathdown County Council has engaged with businesses and community groups along the route to create a scheme that best reflects their needs and aspirations, particularly exploring details concerning the design and location of public realm landscaping, street furniture, loading bays, bicycle parking racks, car parking spaces and traffic flow.

The scheme will replace existing finishes with high quality permanent materials to create a consistent look and feel along the route. This landscape upgrade will provide better seating, footpaths, and planting. New sections of two-way cycle track will be constructed on Newtown Ave and Crofton Road to complete a 4.5 km segregated route from Blackrock to Sandycove. The scheme will make it easier and safer to walk and cycle along the coast with extended pedestrian and cycling infrastructure and enhanced connectivity between Blackrock Village and Sandycove.

The scheme will provide high quality surfaces free of trip hazards and will remove any level differences between pedestrian areas. Permanent in ground planting, including approximately 38 new trees will be included in the works along with areas of low-level planting. Hard landscaping improvements are proposed at the Marine Parade parklet and at Sandycove Point. Rain gardens will also be introduced along the route to catch and store rainwater.

The scheme will provide new bus stops on Crofton to facilitate the implementation of the BusConnects network and will also include a change in traffic direction of traffic along Windsor Terrace (from Link Road to Park Road) to facilitate the Living Streets: Dun Laoghaire project.

Further details can be seen in the scheme drawings.

RELEVANT POLICY CONTEXT

4.1 Overview

SECTION 4:
The section of the report demonstrated that the scheme is strongly supported by policy at all levels (i.e., European, National, Regional and Local). While the scheme aligns most obviously with policy aimed at reducing emissions, improving safety, and encouraging a modal shift to walking and cycling, the project provides a unique opportunity to address a much wider range of policy objectives by integrating green infrastructure and public realm improvements. This section provides a detailed overview of this policy context and highlights how the scheme could make a positive impact in many policy areas.

Policy Level	Policy
European	<ul style="list-style-type: none"> European Green Deal RISM Directive
National	<ul style="list-style-type: none"> Project Ireland: National Development Plan 2021-2030 Project Ireland: National Planning Framework 2040 Climate Action Plan 2023 National Investment Framework for Transport in Ireland (NIFTI) Road Safety Authority (RSA), Road Safety Strategy 2021-2030 National Cycle Policy Framework (NCPF) Smarter Travel: A Sustainable Transport Future 2009-2020 National Sustainable Mobility Policy NTA Statement of Strategy 2018-2022
Regional	<ul style="list-style-type: none"> Greater Dublin Area (GDA) Cycle Network Plan 2013 Greater Dublin Area (GDA) Transport Strategy 2022-2042 GDA Cycle Network Plan 2021 Regional Spatial and Economic Strategy 2019-2031 (RSES)
Local	<ul style="list-style-type: none"> Dún Laoghaire-Rathdown County Council Development Plan 2022-2028 Interim Dún Laoghaire Urban Framework Plan Dún Laoghaire-Rathdown Cycling Policy Dún Laoghaire-Rathdown Climate Change Action Plan 2019-2024

4.2 European Policy

4.2.1 European Green Deal

The European Green Deal was adopted in 2020 and contains a set of policy initiatives (presented in the figure below) aimed at making the European Union climate neutral by 2050. Overall, the Green Deal aims to reduce emissions by at least 50% by 2030 and achieve net-zero emissions by 2050 by introducing new strategies, funding and legislation for the circular economy, transport, buildings, and biodiversity. Two of these strategies are described in further detail.



Figure 3: European Green Deal focus areas.

EU Sustainable and Smart Mobility Strategy

Forming part of the European Green Deal, the EU’s Sustainable and Smart Mobility Strategy aims to reduce transport emissions across the Union through funding, regulations and policy supports for clean and sustainable mobility. While naturally EU policy mainly focuses on pan-European measures and cross-border mobility, the Strategy does reiterate strong support for investment in urban walking and cycling infrastructure by member states.

The Strategy places a particular emphasis on urban mobility and increasing the sustainable mode shares for trips to work, school, and other key destinations. The scheme will make progress towards the strategy, as shown in the table below.

No.	Action
35	As set out in the 2030 climate target plan, increasing the modal shares of collective transport, walking, and cycling, as well as automated, connected, and multimodal mobility will significantly lower pollution and congestion from transport, especially in cities and improve the health and well-being of people. Cities are and should therefore remain at the forefront of the transition towards greater sustainability. The Commission will further engage with cities and Member States to ensure that all large and medium-sized cities that are urban nodes on the TEN-T network put in place their own sustainable urban mobility plans by 2030. The plans should include new goals, for example on having zero emissions and zero road fatalities. Active transport modes, such as cycling, have seen growth with cities announcing over 2300 km of extra cycling infrastructure. This should be doubled in the next decade towards 5000 km in safe bicycle lanes. The Commission is also considering developing a mission in the area of Climate-neutral and Smart Cities ²⁸ as a strategic priority for joint action to accomplish decarbonisation within a large number of European cities by 2030
37	The EU and Member States must deliver on our citizens’ expectations of cleaner air, less noise and congestion, and eliminating fatalities on our city streets. By revising the Urban Mobility Package to promote and support these sustainable and healthy transport modes, the Commission will contribute to the improvement of the current European framework for urban mobility. Clearer guidance is needed on mobility management at local and regional level, including on better urban planning, and on connectivity with rural and suburban areas, so that commuters are given sustainable mobility options. European policies and financial support should also reflect the importance of urban mobility for the overall functioning of the TEN-T, with provisions for first/last mile solutions that include multimodal mobility hubs, park-and-ride facilities, and safe infrastructure for walking and cycling.

This scheme will provide new and safer cycling infrastructure, improved footpaths, and significant additional green landscaping. This will also contribute towards reducing carbon emissions by promoting active travel throughout the county and creating a safe framework for urban mobility.

EU Biodiversity Strategy for 2030

The Biodiversity Strategy is also part of the European Green Deal, and it “aims to put Europe’s biodiversity on the path to recovery by 2030 for the benefit of people, climate and the planet”. Noting that “the biodiversity crisis and the climate crisis are intrinsically linked”, the strategy notes the dual benefits of green infrastructure or nature-based solutions, such as cooling in urban areas, reducing pollution and flooding, mitigating the impact of natural disasters, and protecting wildlife and biodiversity. It also recognises the value of green and open spaces to physical and mental wellbeing, particularly in urban areas where space is limited.

The Biodiversity Strategy recommends a number of actions aimed at greening urban areas, including:

- The “systemic integration” of healthy ecosystems, green infrastructure, and nature-based solutions into urban planning, including in public spaces, infrastructure and the design of buildings and their surroundings.
- The development of ‘Urban Greening Plans’ in all European cities of at least 20,000 inhabitants which would focus on creating biodiverse and accessible urban parks, green spaces, and tree-lined streets; as well as improve connections between existing green spaces.

The scheme provides a prime opportunity to integrate green infrastructure into the design of walking and cycling facilities, and to enhance the urban realm throughout the scheme extents. New planters and roughly 38 new trees as well as the integration of SUDS throughout the entirety of the scheme will not only help enhance the public realm but will also help comply with the EU Biodiversity Strategy by integrating green infrastructure and nature-based solutions along the Coastal Mobility Route.

4.2.2 Road Infrastructure Safety Management (RISM) Directive

The European Union has set a ‘Vision Zero’ target, which aims to halve fatalities on European roads by 2030 and reduce this to ‘almost zero’ by 2050. Influenced by a ‘Safe Systems’ approach, which is a road safety concept that deaths and serious injuries are largely preventable by good design and maintenance of road infrastructure, the ‘Vision Zero’ target is accompanied by a suite of European and national policies and programmes aimed at achieving this strategic ambition.

Accordingly, the Directive on Road Infrastructure Safety Management (RISM) defines procedures for EU member states to improve safety on European road networks. Under RISM, each member state is required to carry out actions to monitor and improve road safety on the network, including network-wide ‘Safety Ranking’, regular Road Safety Inspections, Road Safety Audits during planning and design of infrastructure, training, certification and knowledge exchange with local authorities and European partners. While RISM was originally intended to cover just the TEN-T network, the 2019 revision to the RISM Directive notes that it is: “desirable for those RISM principles to be applied to other parts of the European road network”.

RISM was updated in 2019 to require member states to take into account the needs of ‘vulnerable road users’ in network planning, design, and operation, which are defined as “non-motorised road users, including, in particular, pedestrians and cyclists”. In planning and designing road infrastructure, the updated RISM Directive places much greater emphasis on separating protecting vulnerable road users from the risks of high-speed and high-volume traffic, and requires authorities to consider things such as:

- “Provisions for cyclists, including the existence of alternative routes or separations from high-speed motor traffic.
- Density and location of crossings for pedestrians and cyclists.
- Provision for pedestrians and cyclists on affected roads in the area.
- Separation of pedestrians and cyclists from high-speed motor traffic or the existence of direct alternative routes on lower class roads”.

This project has been designed in accordance with the Design Manual for Urban Roads and Streets (DMURS) and the National Cycle Manual (NCM) and incorporates the re-allocation of road space to pedestrian and cycle. A key goal of this scheme is to increase safety for vulnerable road users and will be subject to several Road Safety and Road User Audits as the design progresses.

4.3 National Policy

4.3.1 Project Ireland 2040: National Development Plan 2021-2030

The National Development Plan 2021 - 2030 was published in 2021 as an early update to the 2018 National Development Plan (NDP). The 2018 NDP was published along with the National Planning Framework in February 2018 as part of Project Ireland 2040. The 2018 NDP was developed to drive Ireland’s long term economic, environmental, and social progress across all parts of the country over the next two decades and underpins the successful implementation of the new National Planning Framework (NPF). The updated NDP 2021 – 2030 extends the funding available to support all sectors and regions in Ireland. It will guide national, regional, and local planning investment decisions over the coming two decades. It also illustrates the commitment to reforming how public investment is planned and delivered. This will be done through a decisive shift to integrated regional investment plans and stronger co-ordination of sectoral strategies.

The National Development Plan provides €165 billion, which will underpin the National Planning Framework and drive its implementation over the next ten years. This will ensure accessibility between key urban centres of population and their regions.

In terms of active travel, €360 million is being committed per year to the development of walking and cycling infrastructure all over Ireland over the next 10 years. This project will draw funding from the National Development Plan.

4.3.2 Project Ireland 2040: National Planning Framework

Project Ireland 2040 is Ireland’s National Planning Framework (NPF) and provides a high-level strategic plan to shape planning policy, future growth, and development in Ireland in the period to 2040. The NPF aims to avoid the “mistakes” made in previous planning policy – mistakes that have led to urban sprawl, unbalanced regional development, and increased car dependency - by ensuring that investment is closely aligned to these overarching principles. The NPF is based on ten ‘National Strategic Outcomes’ (NSO), which are an expression of the shared national goals or benefits the NPF aims to achieve. These are displayed in the figure below.



All public projects are required to demonstrate how they align to the NPF, and how they would contribute to the achievement of the NSO. The alignment of the proposed scheme to the NSO is summarised in the table below.

NSO	Relevance to the proposed scheme
<p>1. Compact Growth</p>	<p>Responding to past levels of urban sprawl and car dependency, the NPF aims to concentrate growth in existing villages, towns, and cities; and to ensure that residents have easy access to jobs, amenities, and services. The scheme will encourage compact growth by encouraging a shift to sustainable modes of transport and increasing accessibility to different areas along the coast via sustainable modes of transport.</p>
<p>4. Sustainable Mobility & 8. Transition to a low Carbon and Climate Resilient Society</p>	<p>The scheme aims to support sustainable mobility and encourage a shift from private cars to reduce transport emissions. New bicycle parking stands will be provided along with higher quality and safer pedestrian and bicycle path facilities. Furthermore, bus stops are being relocated when necessary to allow for optimised accessibility along the routes.</p>
<p>7. Enhanced Amenity & Heritage</p>	<p>The scheme proposes to deliver enhanced amenities and public realm for local residents and visitors to walk, cycle or jog. The high quality hard and soft landscaping proposals will enhance the aesthetic and environmental quality of the streets, de-cluttering and removing cars which will improve views of protected structures and monuments along the Coastal Mobility Route. Furthermore, improved seating area, art pieces and parklets will help enhance amenities.</p>
<p>9. Sustainable management of water, waste, and other environmental resources</p>	<p>The scheme aims to improve environmental quality by integrating green infrastructure (i.e., vegetation, SuDS etc) into the planning and design, where possible. A number of additional trees and planters will be provided along the route.</p>

As well as the NSO, the NPF also includes ‘National Policy Objectives’ to provide a more specific statement of the types of actions or investment that should be prioritised. Several of these are of particular relevance to the scheme and are displayed in the table below. As well as transport and climate objectives, this highlights the potential of the project to make a positive contribution to other policy areas, particularly in terms of improving the environment and quality of life within the study area.

<p>NPO 6</p>	<p>Making Stronger Urban Places: Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.</p>
	<p>The scheme provides enhanced public amenities with high quality materials, helping rejuvenate the coastal route.</p>

<p>NPO 26</p>	<p>People, Homes, and Communities: Support the objectives of public health policy including Health Ireland and the National Physical Activity Plan, through integrating such policies, where appropriate and at the applicable scale, with planning policy.</p>
	<p>The scheme provides better pedestrian and cycling facilities, promoting health and physical activity through active travel.</p>

NPO 27	People, Homes, and Communities: Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.
	Pedestrian and cyclist improvements being provided will help prioritise walking and cycling accessibility along the coastal route. Making these new amenities safer will allow for all age groups to benefit from them.

NPO 57	Realising our Sustainable Future: Integrating sustainable water management solutions, such as Sustainable Urban Drainage (SUDS), non-porous surfacing and green roofs, to create safe places.
	The scheme includes provision of new green areas with integrated SUDS as well as approximately 38 new trees.

NPO 64	Realising our Sustainable Future: Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport to the private car, the promotion of energy efficient buildings and homes, heating systems with zero local emissions, green infrastructure planning and innovative design solutions.
	This scheme supports active travel through new and improved pedestrian and cycle paths, and through improved public transport amenities, which all promote reduction in pollution levels. It also includes green infrastructure such as SuDS.

4.3.3 Climate Action Plan 2023

Following the enactment of the Climate Action and Low Carbon Development Act 2015, the Government published the Climate Action Plan 2019 in June 2019, and published an updated Climate Action Plan in 2023. The objective of the plan is to help accelerate the actions required in order to respond to the climate crisis and put climate solutions at the centre of Ireland’s social and economic development, to enable Ireland to meet the legally-binding, economy-wide carbon budget and sectoral ceilings agreed in 2022 and the emission reductions targets set out in the Climate Action and Low Carbon Developments Acts. The plan set out actions which extended to all sectors of the economy including Transport. The third Climate Action Plan was published in December 2022 after the signing into law of the Climate Action and Low Carbon Development (Amendment) Act 2021 in July 2021. This plan builds on measures and technologies set out in the 2021 plan to deliver greater ambition. The objective of the Plan is to enable Ireland to meet its EU targets to reduce its carbon emissions by 50% by 2030 with the ultimate objective of achieving a transition to a climate resilient, biodiversity rich and carbon neutral economy no later than 2050.

The Plan sets out measures to deliver targets for all sectors of the economy including Transport. Section 15.3 of the Plan outlines measures and actions required to deliver the sectoral emissions targets in the transport sector. These are categorised as Horizontal, Avoid, Shift, and Improve.

Regarding the ‘Sustainable Mobility’ measure in the Climate Action Plan 2023, the proposed Scheme seeks to support and promote sustainable transport, which will encourage a modal shift from individual vehicle usage. The proposed Scheme seeks to provide continuous dedicated cycle and pedestrian facilities throughout the length of the scheme, with the aim of encouraging a modal shift to a more sustainable

transport mode. Therefore, it is considered that the proposed scheme will align with the Climate Action Plan 2023. Some relevant actions are shown in the table below.

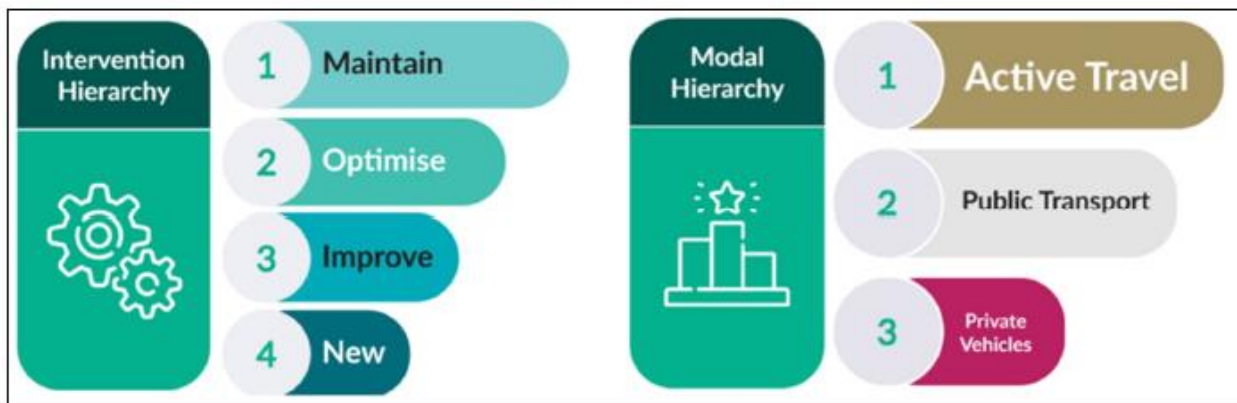
No.	Action
TR/23/14	Promote widespread, consistent, and accelerated implementation of the Design Manual for Urban Road and Streets to ensure improved placemaking and accessibility, including delivery of 10-Minute Towns and 15-Minute Cities.
TR/23/25	Local Areas to identify roads and streets suitable for road space reallocation.
TR/23/27	Pedestrian enhancement plans developed for five metropolitan areas.
TR/23/29	Advance roll-out of 1,000 km walking/cycling infrastructure.
TR/23/30	Advance roll-out of National Cycle and Greenway Networks.
TR/23/31	Advance widespread and consistent implementation of National Cycle Manual guidance and the Design Manual for Urban Roads and Streets with DHLGH.
TR/23/32	Leverage of Protection and Renewal Road infrastructure programme to enhance safety of sustainable mobility users.

4.3.4 National Investment Framework for Transport in Ireland (NIFTI)

The Department of Transport published a framework for guide future investment in the land transport network and to prioritise investment that supports the delivery of the National Strategic Outcomes. The investment objectives of NIFTI are:

- Delivering clean, low-carbon and environmentally sustainable mobility.
- Supporting successful places and vibrant communities.
- Facilitating safe, accessible, reliable, and efficient travel on the network.
- Promoting strong and balanced economy.

NIFTI includes two ‘hierarchies’ specifying the order in which transport investment should be prioritised: an ‘intervention hierarchy’ and a ‘modal hierarchy’; both of which are shown in the figure below.



The Intervention Hierarchy differentiates between the level of intervention proposed, and states that investment should firstly seek to ‘maintain’ existing infrastructure; then to ‘optimise’ or ‘improve’ existing infrastructure; and finally – if it is not possible to achieve an objective through previous steps – to invest in providing ‘new’ infrastructure. The aim of the Investment Hierarchy is to maximise the lifespan and value for

money of past investments, and to ensure that more affordable and efficient options for achieving an objective are considered before investing in large-scale transport projects or programmes.

The scheme is mostly aligned with Level 2 ('Optimise') on the Intervention Hierarchy. While requiring improved infrastructure in parts, the primary focus of the project is optimising and re-designing existing public space along the coastal route to be more efficient, sustainable, and equitable. This includes targeted upgrades to cycling, pedestrian, and public transport infrastructure, while reducing the prominence given to private cars.

The Modal Hierarchy differentiates between the modes of transport, and states that Active Travel (walking and cycling) should be prioritised, followed by public transport, and lastly by private vehicles. As outlined throughout, the scheme has been guided by a user hierarchy which seeks to prioritise active travel and bus users over private cars, which squarely aligns with NIFTI's Modal Hierarchy.

4.3.5 Road Safety Authority (RSA), Road Safety Strategy 2021-2030

The Road Safety Strategy seeks to reduce the number of fatalities and injuries on our roads through a number of specific objectives covering the areas of road safety education, enforcement, and engineering. The primary target of the 2021 – 2030 Strategy is to "reduce deaths and serious injuries by 50% by 2030".

With regard to engineering, it acknowledges that there are frequent issues raised by road users in relation to unsatisfactory road design including cycle lane and junction design. The proposed development of Blackrock village as part of this scheme addresses this area of concern through the provision of high-quality, coherent off-road cycle facilities that provide a level of segregation within the proposed development. The revised junction layouts provide an improved operating environment for vehicular traffic. The proposed development also encourages increased levels of walking and cycling due to a safer and more pleasant environment.

The scheme has been subject to a Stage 1 Road Safety Audit and further audits will be carried out as the design progresses.

4.3.6 National Cycle Policy Framework (NCPF)

The Government is committed to developing cycling as one of the most desirable modes of travel, it being good for your health, the economy, and the environment. The National Cycle Policy Framework (NCPF) sets out objectives to the year 2020 to achieve its vision. Analysis of the best practice of the most cycle friendly cultures, consideration of the views of stakeholders, identification of the potential to grow cycling as a share of overall commuting and mistakes made in the past by other countries allowed the government to identify measures that are required to make Irish towns and villages safe and attractive for cyclists of all ages and abilities and develop a framework document that provides a common, integrated basis for the long term development and implementation of cycling policies among various sectors and levels of government.

The design for this scheme is in accordance with the NCPF and the NCM through prioritisation of cyclists and pedestrians.

4.3.7 Smarter Travel: A Sustainable Transport Future 2009-2020

This document reflects the government's vision and required measures to have a sustainable transport system by 2020. It sets out below five goals:

- To reduce overall travel demand.
- To maximize the efficiency of the transport network.
- To reduce reliance on fossil fuels.
- To reduce transport emissions.
- To improve accessibility to transport.

In order to achieve these goals and ultimately ensure that sustainable travel and transport is in place by 2020, the following key targets are proposed:

- Future population and employment growth will take place predominantly in sustainable compact forms, which would reduce the need to travel for employment and services.
- 500,000 more people will make alternative means to commute and total share of car commuting will drop from 65% to 45%.
- Support and provide alternative methods such as walking, cycling and public transport, to rise the share to 55% of total commuter journeys to work.
- Total kilometres travelled by the car fleets in 2020 will not increase significantly from current levels.
- Reduction of GHG emission from transport sector will be achieved compared to the 2005 level.

Following these objectives and targets, following key actions are proposed:

- Reduce distance travelled by private cars and encourage smarter travel (e.g. encourage people to live close to workplaces, use pricing mechanisms or fiscal measures to encourage behavioural changes).
- Ensure alternatives to the car are more widely available, mainly through radically improved public transport service and through investment in cycling and walking.
- Improve the fuel efficiency of motorised transport through improved fleet structure, energy efficient driving and alternative technologies.
- Strengthen institutional arrangements to deliver the targets.

This scheme will help to achieve these goals by improving the infrastructure for cycling and walking along the coastal route which will make them safer, more convenient, and more pleasant choices of travel.

4.3.8 National Sustainable Mobility Policy

The National Sustainable Mobility Policy sets out a strategic framework to 2030 for active travel (walking and cycling) and public transport journeys to help Ireland meet its climate obligations. It is accompanied by an action plan to 2025 which contains actions to improve and expand sustainable mobility options across the country by providing safe, green, accessible, and efficient alternatives to car journeys. It also includes demand management and behavioural change measures to manage daily travel demand more efficiently and to reduce the journeys taken by private car.

The policy aims to deliver at least 500,000 additional daily active travel and public transport journeys by 2030 and a 10% reduction in the number of kilometres driven by fossil fuelled cars. This project will support this by making it easier for people to choose walking, cycling or public transport daily instead of having to use a petrol or diesel car to access the comprehensive range of services and facilities available along the coastal route.

4.3.9 NTA Statement of Strategy 2018-2022

Following the 2015-2017 Statement of Strategy, The NTA published a new statement of strategy to 2022. The vision set out in this document is to provide a high quality, accessible, sustainable transport network connecting people across Ireland. To deliver this vision, the NTA set out 5 key missions:

- To secure the provision of an efficient, accessible, and integrated transport system in rural and urban Ireland.
- To transform and elevate customer's transport experience.
- To regulate privately operated transport services for the benefit of consumers.
- To contribute to the effective integration of transport and land use policies.
- To advance Ireland's transition to a low emissions transport system.

One of the main strategic priorities is to promote the use of more sustainable transport. This means a shift from cars to public transport, cycling or walking, thereby reducing emissions. This project supports this aim.

4.4 Regional Policy

4.4.1 Greater Dublin Area (GDA) Cycle Network Plan 2013 and GDA Cycle Network Plan 2021

The Government, together with the National Transport Authority (NTA) and other state agencies are committed to support and enhance cycling as a mode of transport in Ireland and develop cycling infrastructure and networks to achieve these objectives. In 2013 the Greater Dublin Area (GDA) Cycle Network Plan was published, see Figure 2 below. Its core objective is to ensure investment into cycle infrastructure is made as efficiently as possible, and to help the NTA and local authorities within the GDA to enhance understanding as to the bicycle facilities currently available, identify gaps in connections and infrastructure, assess the state of existing facilities and where improvement measures will be most advantageous to the public. The National Cycle Manual (NCM) defines a cycle network as “a collection of connected routes. Routes are a set of connected links and junctions that follow logical corridors between zones or urban centres. The purpose of the cycle network is to connect the main zones of origin and destination within an urban area and should provide effective through-movement for cyclists. A well-planned cycle network will carry the vast majority of cycle journeys”. DLRCC, in conjunction with the NTA are currently working on a number of cycle routes through the area, these works form part of the NTA’s GDA Cycle Network Plan.

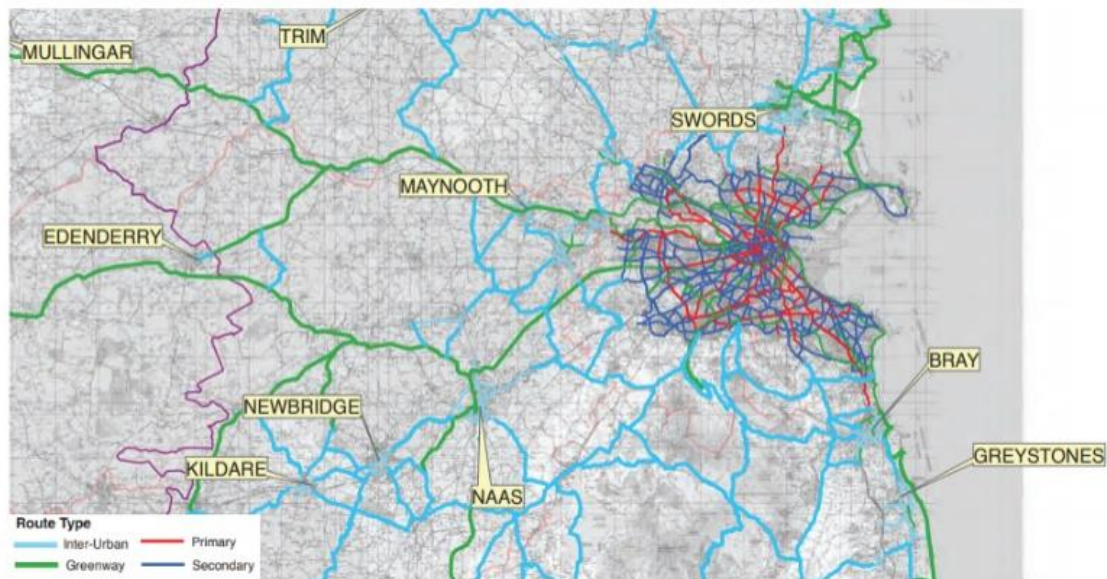


Figure 4: GDA Cycle Network Plan

The 2013 GDA Cycle Network Plan is currently undergoing a review. The updated GDA Cycle Network Plan was published in November 2021 as part of the ‘Supporting Documents’ for the public consultation on the Transport Strategy for the Greater Dublin Area 2022-2042. The Coastal Mobility Route has been identified as a primary route and a greenway in the GDA Cycle Network Plan, as shown in the figure below.

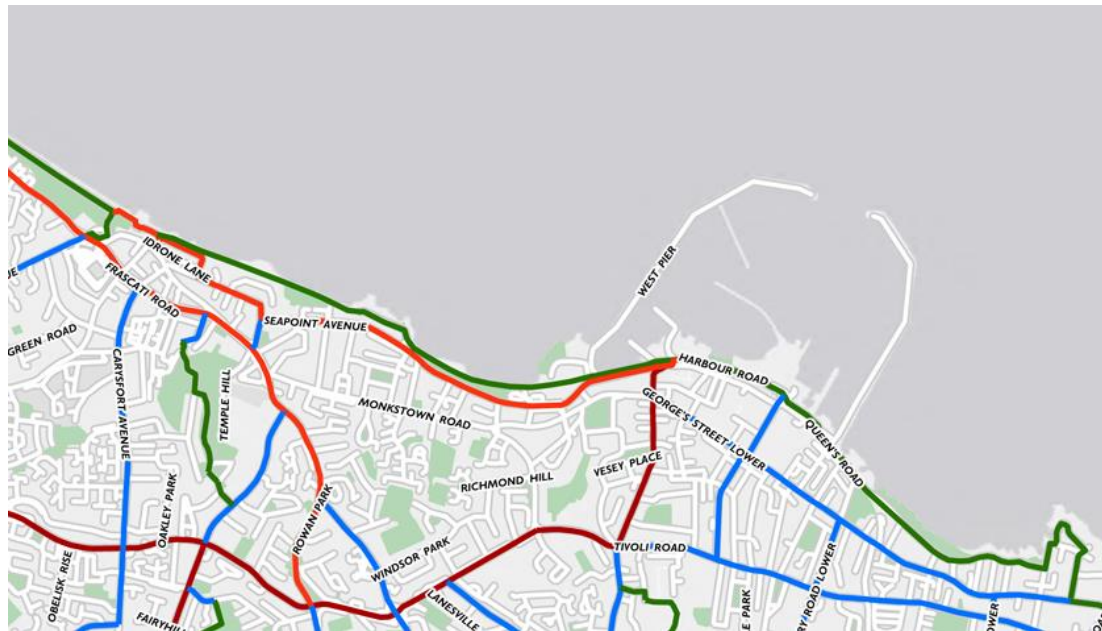


Figure 5: GDA Cycle Network Plan for the Coastal Mobility Route

4.4.2 Greater Dublin Area (GDA) Transport Strategy 2022-2042

The NTA's Greater Dublin Area Transport Strategy 2022-2042 provides a framework for the planning and delivery of transport infrastructure and services over the next two decades. The Strategy's role is to establish the essential policies and measures required to support the Greater Dublin Area in meeting its full potential and increasing sustainable transport use.

The Transport Strategy also proposes changes in the management and operation of the existing transport network to optimise and fully exploit the use of existing transport infrastructure. The strategy outlines the vision for the reallocation of road space and a modal shift from private car use to active travel modes such as walking and cycling. This modal shift and reallocation of road space will result in other benefits for the Greater Dublin Area such as:

- Reduced congestion at peak hours,
- Reduced dependency on private car use,
- Improve accessibility and social inclusion,
- Decreased air pollution levels,
- Increased levels of physical activity and enhanced health and wellbeing benefits.

This project aligns with the goals and objectives set out in the NTA's Strategic Transport Plan for Greater Dublin Area (GDA) for the period up to 2042 (Transport Strategy), and the implementation of this project will support the achievement of the goals set out in the strategy.

4.4.3 Regional Spatial and Economic Strategy 2019-2031 (RSES)

The Regional Spatial and Economic Strategy is a strategic plan and investment framework to shape the future development of our Region to 2031 and beyond by supporting the health and wellbeing of people and places, from urban to rural, with access to quality housing, travel, and employment for all.

Trends within the region indicate that there is an overreliance on the private car for travel to work and education. It is estimated that congestion in the Dublin area was costing the economy over €350m per year by 2012, in terms of lost time, and that this would grow to more than €2bn by 2033. This congestion impacts on the region's commuters, public transport and the efficient movement of goods and services to, from and within the region. Transport can affect health and wellbeing both directly, for example through traffic accidents, commuter stress, or accessibility to employment and health services and indirectly, for example through higher rates of diseases and ill health as a result of pollution or sedentary lifestyles. Increasing

traffic is a health hazard that predominantly effects the more socially disadvantaged and deprived. In contrast the provision of good public transport, greenways and cycleways can enhance areas, contributing to liveable places and creating opportunities to be physically active. There is a need to overcome barriers to better mobility be they political, economic, or physical such as poverty, disability, affordability, or gender.

This scheme supports the RSES by reducing reliance on private cars by creating safe and accessible pedestrian, cycle and public transport amenities along the coastal route. These amenities help in overcoming mobility barriers and help affect health and wellbeing of the population in a positive way, reducing the risk of accidents, commuter stress and accessibility to employment and health services, but also by promoting physical activity as opposed to use of private vehicles.

4.5 Local Policy

4.5.1 Dún Laoghaire-Rathdown County Council Development Plan 2022-2028

The County Development Plan guides future growth and development in the County. The DLR County Development Plan sets out the policy objectives and the overall strategy for the proper planning and sustainable development of the County over the plan period from 2022 to 2028. The Plan sets out an approach centred on the core principle of sustainability with a focus on creating vibrant, liveable, climate resilient communities. This Plan is consistent with both the 'National Planning Framework' (2018) (NPF) and the 'Regional Spatial and Economic Strategy' (2019) (RSES).

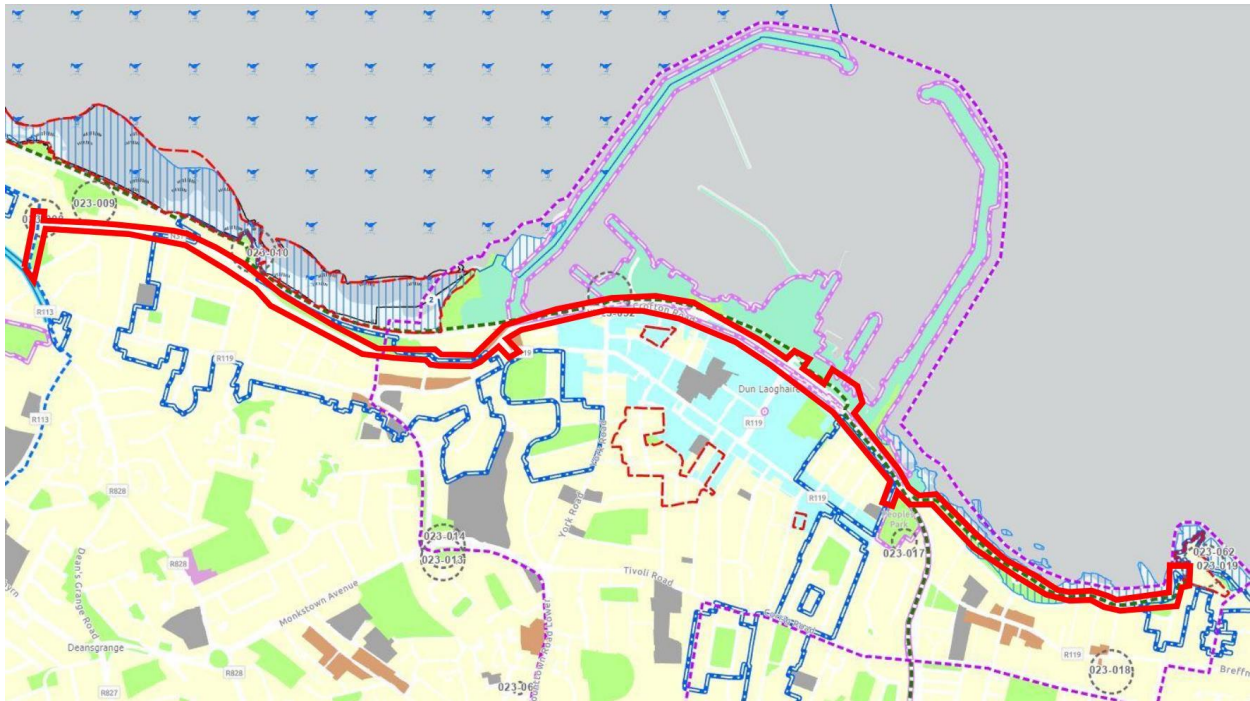


Figure 6: DLR Development Plan Map

The DLR development plan interactive map can be found online at:

<https://dlrcocouncil.maps.arcgis.com/apps/webappviewer/index.html?id=6e5e0fb0384a47dcb61cbf4e36eb6dcc>

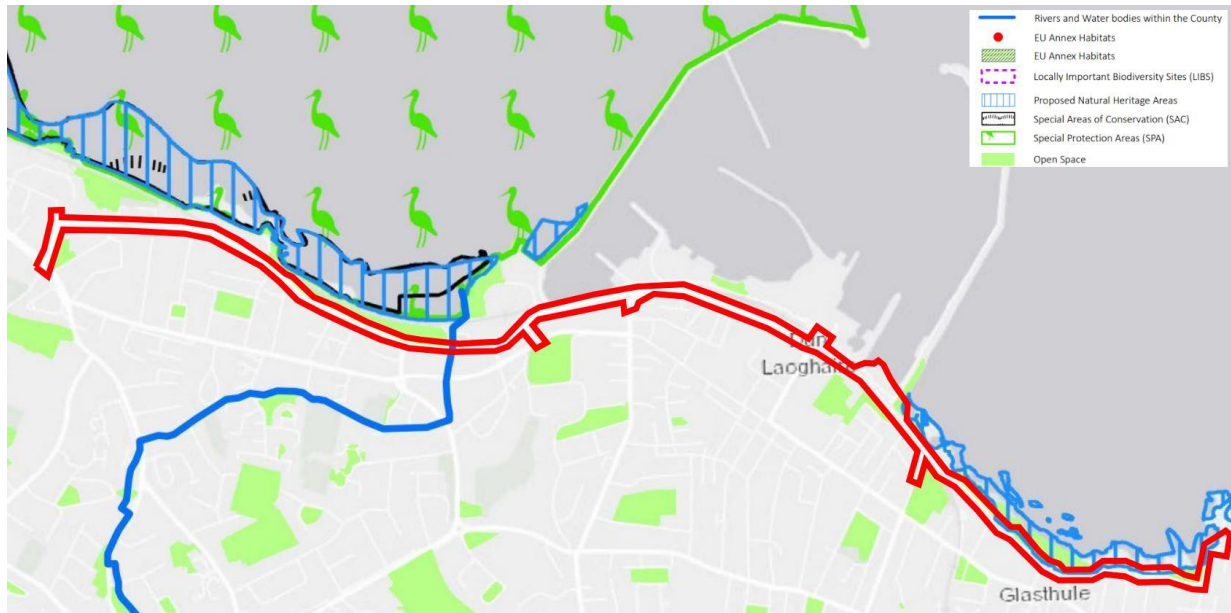


Figure 7: DLR Ecological Network Map

The DLR Ecological Network Map can be found online at:

https://www.dlrcoco.ie/sites/default/files/atoms/files/supplementary_map_b1_ecological_network_map_1.pdf

The scheme will support the specific objectives of the DLR County Development Plan 2022-2028, which include the following:

Objective CA18	It is a Policy Objective to retain and promote urban greening - as an essential accompanying policy to compact growth - which supports the health and wellbeing of the living and working population, building resilience to climate change whilst ensuring healthy placemaking. Significant developments shall include urban greening as a fundamental element of the site and building design incorporating measures such as high-quality biodiverse landscaping (including tree planting), nature-based solutions to SUDS and providing attractive routes and facilities for the pedestrian and cyclist.
	This project proposes new landscaping where possible within the scheme, including the planting of approximately 38 new trees. Nature based SuDS solutions will be used, and rain gardens will be introduced to trap and store water during storms which will reduce the demands on the water network in an environmentally friendly way.

Objective PHP36	It is a Policy Objective to promote and support the principles of universal design ensuring that all environments are inclusive and can be used to the fullest extent possible by all users regardless of age, ability, or disability.
	This scheme has been designed in accordance with guidance documents such as DMURS and the NCM to ensure accessibility throughout the extents of it. The proposed scheme will allow for the new cycle facilities to be used by everyone regardless of age and cycle experience.

Objective PHP37	It is a Policy Objective that all development proposals, whether in established areas or in new growth nodes, should contribute positively to an enhanced public realm and should demonstrate that the highest quality in public realm design is achieved.
	This is an improvement scheme plans to improve the public realm amenities as well as the cycling and pedestrian facilities. High quality materials will be used along the route in order to contribute to the improvements.

Objective T1	It is a Policy Objective to actively support sustainable modes of transport and ensure that land use and zoning are aligned with the provision and development of high-quality public transport systems.
	This scheme improves the environment for pedestrians and cyclists and will make these safer, more attractive, and more convenient choices for the public.

Objective T6	It is a Policy Objective to co-operate with the NTA and other relevant agencies to facilitate the implementation of the bus network measures as set out in the NTA's 'Greater Dublin Area Transport 2016-2035' and 'Integrated Implementation Plan 2019-2024' and the BusConnects Programme, and to extend the bus network to other areas where appropriate subject to design, environmental assessment, public consultation, approval, finance, and resources.
	This scheme takes into account the implementation of bus measures such as BusConnects.

Objective T11	It is a Policy Objective to secure the development of a high quality, fully connected and inclusive walking and cycling network across the County and the integration of walking, cycling and physical activity with placemaking including public realm permeability improvements.
	This scheme will provide fully connected and inclusive cycling and pedestrian facilities and integrate these modes of transport into the public realm design.

Objective T13	It is a Policy Objective to secure improvements to the County Cycle Network in accordance with the Dún Laoghaire-Rathdown Cycle Network Review whilst supporting the NTA on the development and implementation of the Greater Dublin Area Cycle Network Plan 2013 and subsequent revisions, subject to environmental assessment and route feasibility.
	This scheme will complete new cycle links that will add to these networks.

Objective T14	It is a Policy Objective of the Council to promote the development of the Sutton to Sandycove Promenade and Cycleway, as a component part of the National East Coast Trail Cycle Route and also the Dublin Bay Trail from the boundary with Dublin City to Wicklow County.
---------------	--

	This scheme will complete new cycle links that will add to these networks.
--	--

Objective T23	It is a Policy Objective, in conjunction and co-operation with other transport bodies and authorities such as the TII and the NTA, to secure improvements to the County road network – including improved pedestrian and cycle facilities, subject to the outcome of environmental assessment (SEA, EIA and AA), flood risk assessment and the planning process.
	This scheme will provide improved pedestrian and cycle facilities which will improve the County road network. The NTA have been consulted regarding the proposed design.

Objective T29	It is a Policy Objective to introduce Traffic Management Schemes on particular roads and in appropriate areas throughout the County to reduce vehicle speeds to an acceptable level
	This proposed layout seeks to reduce vehicle speeds by narrowing the lane width in places, tightening corner radii, and introducing speed humps where appropriate.

Objective OSR7	It is a Policy Objective to implement the objectives and policies of the Tree Policy and the forthcoming Tree Strategy for the County, to ensure that the tree cover in the County is managed, and developed to optimise the environmental, climatic, and educational benefits, which derive from an ‘urban forest’, and include a holistic ‘urban forestry’ approach.
	This scheme proposes significant new landscaping including the planting of approximately 38 new trees along the coastal route.

Objective E16	It is a Policy Objective to ensure that all development proposals incorporate Sustainable Drainage Systems (SuDS).
	Nature based SuDS solutions will be used on this project. Rain gardens will be introduced to trap and store water during storms which will reduce the demands on the water network in an environmentally friendly way.

Objective HER18	It is a Policy Objective that development proposals within a candidate Architectural Conservation Area will be assessed having regard to the impact on the character of the area in which it is to be placed.
	The proposed scheme relates to road upgrade works, it does not require any significant construction works or any additional land-use changes. The proposed scheme will preserve the established character of the buildings and streetscape. Therefore, there are no potential implications regarding the location of the Dun Laoghaire cACA.

4.5.2 Interim Dún Laoghaire Urban Framework Plan

The Interim Urban Framework Plan is intended to set out a clear and coherent vision to assist and guide the ongoing development and regeneration of Dún Laoghaire Town. This Framework Plan is entitled an Interim Plan and will be reviewed following on from the outcomes of the two ongoing studies of the Harbour and the town.

The scheme will support the specific objectives of the Interim Dún Laoghaire Urban Framework Plan, which include the following:

Objective 8	Provide a network of attractive and green urban spaces and public realm to enhance the user experience while also tacking climate action to create a low carbon, climate resilient and sustainable town.
	This scheme will provide new green spaces that incorporate SuDS features, contributing to a sustainable town. Furthermore, promoting cycling and walking as means of transports will help create a low carbon climate resilient and sustainable town.

Objective 14	Build on the temporary Covid 19 emergency works and strengthen cycling and walking links between Dún Laoghaire, Blackrock and Monkstown along Seapoint Avenue and Crofton Road and between Dún Laoghaire, Glasthule and Sandycove along Queen's Road and Newtownsmith.
	This scheme will make the emergency works permanent and will strengthen cycling and walking links in all the desired locations.

Objective 24	To implement the DLR Cycle Network objectives within the Interim Framework Plan area.
	This scheme improves and makes permanent the Coastal Mobility Route, which aligns with objectives in the DLR Cycle Network

4.5.3 Dún Laoghaire-Rathdown Cycling Policy

The publication by the government in 2009 of Smarter Travel - a Sustainable Transport Future 2009-2020 followed by the National Cycle Policy Framework 2009 – 2020 (NCPF) has set a new transport agenda in Ireland with an increased emphasis on sustainable transport including cycling. In particular, the NCPF recognises the contribution that cycling can make towards improving the quality of life and health of individuals whilst also contributing to the wider public realm, a stronger economy, and an enhanced environment for all.

The vision in this document is to cultivate a cycling culture, through the implementation of appropriate infrastructure and promotional measures, that positively encourages all members of the community to cycle at all life stages and abilities as a mode of sustainable transport that delivers environmental, health and economic benefits to both the individual and the community. This document sets out Dún Laoghaire-Rathdown County Council's own policies in response to the publication of the National Cycle Policy Framework, 2009 – 2020 and includes guidance for developers on cycle parking and cycle facilities to be provided as a consequence of new development.

To deliver its contribution to local and national goals, the Council, through the various policies set out in this document, will focus its attention on the following cycling activities by way of provision of infrastructure, promotion and marketing or any combination of these:

- Trips to school.
- Trips to work.
- Trips to and from public transport interchanges as part of onward journeys to work.
- Other utility trips i.e., trips to shops, leisure facilities etc.
- Recreational and tourism trips, including countryside access.
- Long distance and rural routes (except where they contribute to wider objectives, i.e. – above).

The proposed development includes permanent and improvement cycle facilities Blackrock Village and Sandycove. This promotes cycling as a mode of transport, and increases safety for cyclists, making these facilities accessible to all types of cyclists. The scheme also promotes a healthier lifestyle by encouraging and allowing people to cycle through Dun Laoghaire.

4.5.4 Dún Laoghaire-Rathdown Climate Change Action Plan 2019-2024

Dún Laoghaire-Rathdown County Council's Climate Action Plan sets out how the Council will improve energy efficiency and reduce greenhouse gas emissions in its own buildings and operations, while making Dún Laoghaire-Rathdown a more climate-resilient region, with engaged and informed citizens. This will be achieved by a range of ongoing and planned actions in five key areas which will be continuously monitored, evaluated, and updated to 2030 and beyond.

The key targets set out in the plan are as follows:

- 33% improvement in the Council's energy efficiency by 2020.
- Make Dublin a climate-resilient region by reducing the impacts of future climate change-related events.
- 40% reduction in the Council's greenhouse gas emissions by 2030.
- Actively engage and inform our citizens on climate change.

To fulfil those targets, DLRCC have decided to focus on five key actions areas: transport, food resilience, nature-based solutions, resource management and energy & buildings. This scheme will support the transport and nature-based solutions elements of this plan.

The proposed development aims at promoting and increasing active travel in the County, which in turn will help make Dún Laoghaire-Rathdown a more climate-resilient region, with engaged and informed citizens. Furthermore, the inclusion of SUDS in the scheme falls under the "nature-based solutions" area set out in the DLRCC Climate Change Action Plan.

4.6 Design Guidance

In addition to the relevant policy guidance, the proposed scheme has been prepared in compliance with the following design guidance:

- DMURS (Design Manual for Urban Roads & Streets).
- National Cycle Manual.
- National Transport Authority, Project Management Guidelines.
- Traffic Management Guidelines.
- Traffic Signs Manual.

POTENTIAL IMPACTS OF THE SCHEME

5.1 Design and Visual Impact

Design proposals for the Coastal Mobility Route and its surroundings will complement and not compete with the existing historical character and context of the area. The principles for the design seek to encourage cycling, pedestrians into the public realm, create safe, tranquil spaces, increased greenery, and integrated SUDs measures.

The streets will be decluttered and trip hazards removed, making movement easier for those with mobility issues and more accessible for other users such as those with buggies. The materials will be of high quality and utilise the warmth of natural stone. Tactile paving and continuous footpaths or dropped kerbs will be provided at key crossings and the transitions throughout the space follow best practice and guidance. Lighting, bins, and bike racks will be located appropriately, and the soft landscaping palette will provide year-round interest.

5.2 Traffic and Transport Assessment

The proposed scheme includes a change in the direction of traffic between Link Road and the People’s Park junction from Eastbound to Westbound. The traffic levels are expected to increase slightly on this section of road but will still be far below what they were before the introduction of the temporary one-way system. Traffic calming measures will be implemented along the route to reduce vehicle speeds and increase safety for road users, cyclists, and pedestrians. The proposed design will provide a higher level of service for pedestrians and cyclists, and this will encourage some drivers to instead choose sustainable modes of transport when using the Coastal Mobility Route.

BusConnects Network Redesign

The National Transport Authority published the new Dublin Area bus network in September 2020. The overall objective of the improved network is a significant increase in capacity and frequency for customers, as well as more evening and weekend services for all spines.

The implementation of the new network will take place on a phased basis over a number of years, the first phase of the new BusConnects network for Dublin was launched in June 2021 and it is expected to be fully implemented by the end of 2024.

The new network is expected to be in place by the time this project has finished construction and so the scheme is being designed with the future network in mind, rather than the existing one. However, depending on the progress of the two projects an interim scheme may be required, and this has also been considered by the design team.



Figure 7: BusConnects new network along the Coastal Mobility Route

BusConnects Belfield/Blackrock to City Centre Core Bus Corridor (CBC)

The NTA have progressed the design of this CBC and the planning application was lodged in May 2022. The route travels down Frascati Road and will interact with this scheme at the junction with Newtown Avenue. A screenshot of the proposed design for this junction is shown below.

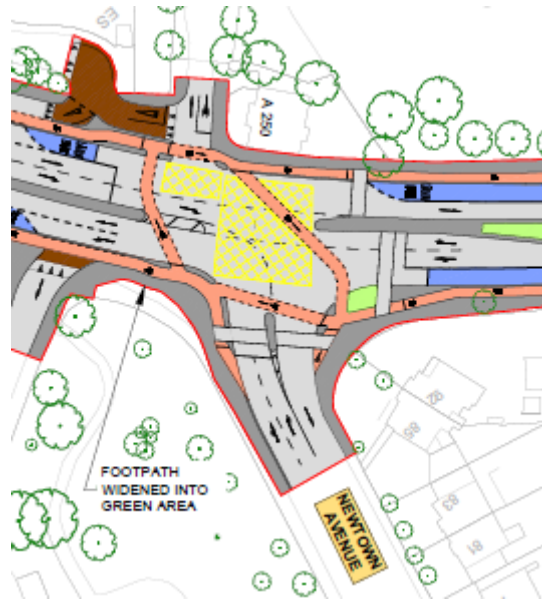


Figure 8: BusConnects – Proposed Newtown Avenue Junction

A new westbound bus stop is proposed on Crofton Road opposite the Dart station to support the implementation of the new BusConnects network.

5.3 Cultural Heritage (Archaeology and Architectural Heritage)

The post-box located at the Seafield Avenue and Seapoint Avenue junction is on the record of protected monuments, there are also several protected structures along the coastal route. The post-box and the protected structures will not be impacted by the scheme and will be maintained in their existing locations.

5.4 Biodiversity, Landscaping and Arboriculture

Arborist Associates Ltd was commissioned to provide a condition assessment of the existing trees within the study area as well as an impact assessment report for the trees on Crofton Road. This study recommended the removal of no trees along the coastal route.

Extensive landscaping and tree planting will be carried out as part of the works including the planting of approximately 38 new trees around the village.

During the construction works, a professionally qualified Arboriculturist will be retained by the principal contractor or site manager to monitor and advise on any works within the Root Protection Zones (RPA) of existing trees to ensure successful tree retention and planning compliance. This arborist will also be responsible for preparing methods statements for, and supervising, the planting of all new trees.

5.5 Drainage and Utilities

5.5.1 SuDS Policy

Dún Laoghaire-Rathdown County Council has set out their County Development Plan 2022-2028 which strives to deliver on its core focus of sustainability whilst centring its objectives towards achieving climate resilient, liveable, and vibrant communities. Within the County Development Plan, DLRCC have emphasised

the role green infrastructure has in delivering these core principles, outlining it as a strategic asset in aiding sustainable development and as a key factor in the progression to a climate resilient nation.

Sustainable management of water, waste and other environmental resources is supported in both National Strategic Outcome 9 of the National Planning Framework (NPF) and Regional Strategic Outcome 7 of the Regional Spatial and Economic Strategy (RSES). National Policy Objectives 5 of the NPF also advocates enhanced water quality and resource management, notably through the use of Sustainable Drainage Systems (SuDS).

Objective EI6 from the DLR County Development Plan aims to ensure that all development proposals incorporate Sustainable Drainage Systems (SuDS). Developments will only be permitted where the Council is satisfied that suitable measures have been proposed that mitigate the impact on drainage through the achievement of control of run-off quantity and quality while enhancing amenity and habitat. In particular the requirements of the 'SuDS Manual' by the UK's Construction Industry Research and Information Association (CIRIA) shall be followed unless specifically exempted by the Council.

The DLR County Development Plan also details that where a SuDS scheme provides biodiversity and amenity value and is readily accessible for either use or enjoyment in most weather conditions, a proportion of the SuDS area could be incorporated as a component part of the communal or public open space provision. This proportion will be decided by the Planning Authority on a case-by-case basis. The Council will also encourage the use of bioswales in roadside verges, and open spaces.

Furthermore, in Appendix 7 of the Development Plan, it is detailed that in accordance with County Development Plan 2022-2028 Section 10.2.2.6 Policy Objective EI4: Sustainable Drainage Systems, the proposal must demonstrate that they meet the requirements of the Greater Dublin Strategic Drainage Study (GSDS) policies in relation to Sustainable Drainage Systems (SuDS). The design must incorporate SuDS measures appropriate to the scale of the proposed development such as green roofs, bioretention areas, permeable paving, rainwater harvesting, swales, etc. that minimise flows to the public drainage system and maximises local infiltration potential. The applicant should provide cross-sections and long-sections, and commentary that demonstrates all proposed SuDS measures have been designed in accordance with the relevant industry standards and the recommendations of The SuDS Manual (CIRIA C753).

The above policies are supported at European level by the EU Water Framework Directive, this sets out rules to halt deterioration in the status of EU water bodies and achieve good status for Europe's rivers, lakes, and groundwater.

5.5.2 SuDS Strategy

The Living Streets: Coastal Mobility Route project will contribute to achieving the above objectives and will seek to provide the highest level of SuDS solutions possible while working within the constraints of the existing built environment. These SuDS features will combine to deliver the four key SuDS objectives:

Water Quantity – this project will use the sponge city principles to introduce pockets of water storage along the street. The first choice in this approach is to use nature-based solutions, typically in the form of raingardens and swales. There is a significant tree planting and landscaping proposed as part of this project, that will reduce the impermeable area along the route and greatly increase the water attenuation in the event of heavy rainfall. Rain gardens are proposed along the route in several locations. Approx. 38 new trees will also be planted along the route including several within the rain gardens. These green features will introduce evapotranspiration into the water management sequence, this is the vaporisation of water back into the local atmosphere, reducing the volume of water that passes through the network while also cooling local temperatures. Something that is especially beneficial when dealing with heavy summer showers.

Water Quality – The street designs will carefully consider the water shed path for surface water as it is conveyed across the street surface and enters into the drainage system. The aim is that as much water entering the system as possible should pass through biofilters that will trap and hold sediment, typical highway contaminants, such as hydrocarbons, brake dust and rubber crumb, amongst others. Biofilters also reoxygenate the water as well as cooling it down. It is important to note that all stormwater drainage from

the study area feeds into a combined sewer network and so ends up at a wastewater treatment plant. As such, the benefits from providing SuDS features that would filter and clean the water along the coastal route will be limited on this project.

Biodiversity – using nature-based solutions will hardwire habitat into the streetscapes, creating a long-term ecological environment for nature to recolonise and occupy.

Amenity - These green features will enhance the experience of passing along the route, especially on foot or by bicycle. By improving this experience, it will also increase the likelihood of people choosing to walk and cycle.

5.5.3 SuDS and Drainage Next Steps

As the design develops, further investigation into the position of existing drainage and utilities, soil conditions and adjacent land use may be required to establish what level of intervention can be achieved as part of this project. This could include, but not be exclusive to the following surveys and engagement:

- Soakaway testing to appraise infiltration feasibility and presence of contamination.
- CCTV surveys of existing drainage to establish condition and alignments.
- Targeted trial pits to establish extent of underground constraints.
- Consultation with relevant local authority departments and external stakeholders on potential use of adjacent areas of site to maximise SuDS benefits.

The detailed design of the SuDS features will include cross-sections, long-sections and commentary that demonstrates all proposed SuDS measures have been designed in accordance with the relevant industry standards and the recommendations of The SuDS Manual (CIRIA C753).

Suitable maintenance programmes will also need to be established to maximise the benefit and ensure the longevity of the scheme. Any agreed maintenance schedule for green infrastructure should include the following:

- Regular removal of debris
- Regular inspections of pipework and sediment forebays

Repairing of any erosional damage or re-planting when deemed necessary.

5.5.4 Flooding

Sections of the scheme along the low-lying areas of the route are subject to coastal flooding and are in flood zones A and B. These sections include Sandycove, Dun Laoghaire Harbour and Marine Parade. As per Section 5.28 of the Guidelines for Planning Authorities on Flooding, schemes such as this one which are unlikely to raise significant additional flooding issues are permitted to proceed within flood risk zones. The

Furthermore, two sections of the scheme are in areas of flood risk concern: Pluvial – Foul. These sections are the junction between Old Dunleary Road and Cumberland Street, and the junction between Link Road and Newtownsmith. The total prevention of flooding in these locations is beyond the scope of this project and would require separate flooding studies. Potential mitigation measures will be investigated during the detailed design stage, however the total prevention of flooding in these locations is likely to be beyond the scope of this project and would require separate flooding studies.

5.6 AA Screening

Screening for Appropriate Assessment is required under Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the Habitats Directive).

An Article 6(3) Screening for Appropriate Assessment of proposed scheme has been prepared by MKO, which concluded,

“It is concluded beyond reasonable scientific doubt, in view of best scientific knowledge, on the basis of objective information and in light of the conservation objectives of the relevant European sites, that the proposed development, individually or in combination with other plans and projects, in the absence of mitigation, will not have a significant effect on any European Site designated under the Habitats Directive and Birds Directive.

As a result, an Appropriate Assessment is not required, and a Natura Impact Statement shall not be prepared in respect of the proposed development.”

5.7 EIA Screening

Barry Transportation has undertaken an EIA Screening Report to inform the proposed scheme. The purpose of the EIA Screening Report was to determine whether the preparation of EIAR is required for the proposed scheme.

The assessment identifies that the proposed scheme does not meet the criteria or minimum thresholds outlined in Section 50(1)(a) of the Roads Act 1993 (as amended) or Schedule 5, Part 1 and Part 2 of the Planning and Development Regulations 2001 (as amended), and therefore does not trigger the requirement for a mandatory EIA.

A sub-threshold screening assessment was undertaken in accordance with selection criteria outlined in Annex III of the EIA Directive and Schedule 7 of the Planning and Development Regulations 2001 (as amended) in order to determine whether or not the proposed development would be likely to have significant effects on the environment.

The likely impacts that will arise from the proposed scheme in the absence of appropriate mitigation measures have been evaluated in-line with relevant guidance and regulatory frameworks described above.

It is recognised that during the construction phase of the Proposed Development there may be temporary and transient negative impacts although not significant.

However, the Contractor shall comply with all relevant environmental legislation, published standards, accepted industry practice, national guidelines, and codes of practice appropriate to the proposed scheme during the construction phase. If the recommended mitigation measures are adhered to, the proposed scheme will not result in any significant effect on any of the headings investigated as part of the sub-thresholds assessment for the Proposed Development.

The following mitigation measures shall be implemented during the construction phase of the proposed scheme.

- To ensure minimum disruption to Dún Laoghaire's existing underground services, it is recommended excavation be kept to a minimum.
- Construction material shall be sourced locally from licensed suppliers, where possible.
- Relevant best practice guidance documents, including the National Roads Authority's (NRAs) 'Guidelines for the Treatment of Noise and Vibration in National Road Schemes' (NRA, 2004) and the World Health Organisation's (WHO's) 'Community Noise Guidelines' (Berglund et al., 2003), should be implemented during the construction phase and working hours onsite should be limited to prevent noise becoming a nuisance. Other best practice pollution prevention measures include

CIRIA 'Guideline Document C532 Control of Water Pollution from Construction Sites' and 'C648 Control of Water Pollution from Linear Construction Projects'.

- A detailed mitigation strategy will be undertaken by a suitably qualified archaeologist and architectural heritage expert in advance of the construction phase of the development to eliminate the potential for significant impacts.
- Despite the ground disturbance caused by the previous development of the road, the National Monuments Service may require that an archaeological watching brief be carried out (involving archaeological monitoring and recording) alongside groundworks within the Zones of Notification by a suitably qualified and licensed Archaeological contractor. Relevant licenses should be acquired from the DoCHG/NMS and the National Museum of Ireland (NMI) for all archaeological works. Any archaeological mitigation must be agreed in consultation with the National Monuments Service and Dún Laoghaire-Rathdown County Council; and
- Close correspondence should be maintained between local utility providers in case of an instance where a diversion of utilities arises owing to the works during the construction phase.
- A Construction Environmental Management Plan, Waste Management Plan and Construction Traffic Management Plan should be prepared for the Proposed Development by the Contractor prior to construction.

CONSULTATIONS AND ALTERNATIVES CONSIDERED

6.1 Consultations

SECTION 6:
Consultation has been undertaken with the various departments in DLRCC to obtain feedback on the draft Scheme. Minor comments were received which will be taken on board during the detailed design stage.

The recommendations from the TUD Transportation and Economic studies on the current temporary cycle track have also been considered when developing the scheme.

6.2 Alternatives Considered

Barry's Transportation have prepared an Options Report which presents the alternatives options considered to inform the identification of a preferred option. The area was split into five sub-sections and several options were developed for each section. Multi Criteria Analysis (MCA) was undertaken for each section of the scheme, with a preferred option identified and taken forward through Preliminary Design. Through this process, the preferred route was identified as is set out in the scheme drawings.