

Date: 2 July 2024

**FAO:** An Bord Pleanála (Strategic Infrastructure Division)

**Ref:** ABP-317742-23

**From:** Julieanne Prendiville, Senior Executive Planner, Transportation, DLRC, Tel: DDI 2054719, Email: julieanneprendiville@dlrcoco.ie *on behalf of* Dun Laoghaire – Rathdown County Council, Marine Rd, Dun Laoghaire, Co. Dublin, A96 K6C9.

**Re. NTA Observations on the Proposed Scheme Submission (May 2024) on BusConnects Bray to City Centre Core Bus Corridor Scheme**

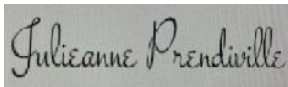
Dún Laoghaire-Rathdown County Council (DLRCC) received notification from An Bord Pleanála (dated 17th June 2024) inviting the Council to make a submission under s.217B of the Planning and Development Act 2000, as amended in relation to the submission received from the NTA (dated 24th May 2024) in respect of the BusConnects Bray to City Centre Core Bus Corridor Scheme.

This correspondence was referred to various departments within the Council for comment where relevant. In response two replies were received from the Active Travel Unit and the Parks Section, which are outlined below under appendix A and B, along with their associated attachments.

With regards to the Traffic and Road Safety Section, they are of the view that the detailed design of all junctions in particular signalised junctions should be agreed with the Council prior to construction.

As for the management of the process going forward, DLRC request that the proposed conditions suggested in the original submission should still apply.

Regards,



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Julieanne Prendiville, Senior Executive Planner  
Transportation, Dún Laoghaire-Rathdown County Council

## Appendix A



# Memorandum

Active Travel, Infrastructure and Climate Change Department,  
Level 3, 1 Harbour Square, Dún Laoghaire

Date: 1 July 2024

To: dlr Transportation Section

From: Michele Costello, Senior Executive Planner, Active Travel

Subject: NTA Observations on the Proposed Scheme Submission (May 2024) on BusConnects Bray to City Centre Core Bus Corridor Scheme

### Re. NTA Observations on the Proposed Scheme Submission (May 2024) on BusConnects Bray to City Centre Core Bus Corridor Scheme

#### Active Travel Section Commentary

Dún Laoghaire-Rathdown County Council (DLRCC), in conjunction with the NTA, are working with ARUP consulting engineers on a rapid build cycle scheme between Cherrywood Park access and Rathmichael Manor, Loughlinstown, Co. Dublin. The proposed Cherrywood to Rathmichael Manor Rapid Build Cycle Scheme is being promoted by the Active Travel Section, Infrastructure and Climate Change Department.

In response to the 'Rapid Build Active Travel Facilities' (Page 769 of the NTA Observations dated 24 May 2024), DLRCC Active Travel Section brings to the attention of the Board that it has completed non-statutory public consultation on the proposed Cherrywood to Rathmichael Manor Rapid Build Cycle Scheme which is being progressed under Section 38 of the Roads Traffic Act 1994.

#### Description of Proposed Rapid Build Scheme

The Cherrywood to Rathmichael Manor Rapid Build Cycle Scheme is approximately 720 metres long. The scheme commences at the Cherrywood Park access, routing along Bray Road on the western side of the N11 as far as Rathmichael Manor. Access will be maintained to all existing properties along the route.

A 'cycle street' design is proposed along the Bray Road (slip road from N11) which utilises the low-traffic nature of the Bray Road. The 'cycle street' transitions briefly into a shared path where the N11/Bray Road slip lane merges onto the cycle street. A two-way cycle track and footpath is proposed south of the N11/Bray Road slip road. The two-way cycle track and footpath lead to a new pedestrian and cycle crossing at Rathmichael Manor.

The works will include ancillary upgrade works to the public footpath, modifying the St Columcille's Hospital bus stop (stop 3143) to an island-style bus stop together with a pedestrian crossing of the cycle lane at that point. A 3-metre-wide shared path will link the footpath and cycle track with the Loughlinstown pedestrian bridge. The scheme will include additional traffic calming measures including new road markings, signage and two raised tables along the Bray Road. Plans and particulars of the scheme as shown on Drawing Numbers: **CSG-ARUP-ZZ-ZZ-DR-CH-0100-P03 to CSG-ARUP-ZZ-ZZ-DR-CH-0104-P03**. Details of the scheme are available on the DLRCC CitizenSpace website <https://dlrcoco.citizenspace.com/infrastructure-climate-change/cherrywood-rathmichael-manor-cycle-scheme/>

A copy of the proposed rapid build scheme plans are enclosed for your convenience, titled Drawing Numbers: **CSG-ARUP-ZZ-ZZ-DR-CH-0100-P03 to CSG-ARUP-ZZ-ZZ-DR-CH-0104-P03, along with Visualisations and public information pdf.**

Non-statutory public consultation on the proposed scheme was undertaken from 9 April to the 7 May 2024. At the time of writing, the Active Travel Section are still in the process of reviewing the submissions and observations received as part of the non-statutory public consultation.

As referred to by the NTA in its submission, DLRCC has been engaging throughout with the NTA in respect of this proposals and the proposals have been assessed throughout having regard to the BusConnects Bray to City Centre Core Bus Corridor Scheme along this section of the route. It is noted that the BusConnects Bray to City Centre CBC proposes a single way cycle track along a section of the route. The DLRCC rapid build scheme proposes a two-way cycle track. The proposed rapid build scheme has been carefully assessed and designed having regard to the BusConnects design proposals and does not conflict with the BusConnects proposals. DLRCC will continue to engage and collaborate with the NTA in respect of the progression of this proposed rapid build scheme.

DLRCC also note that the proposed development has been screened for Environmental Impact Assessment (EIA) and screened for Appropriate Assessment (AA). DLRCC determines that there is no real likelihood of significant effects on the environment arising from the proposed development, either by itself or in combination with other plans or projects, and that an EIA is not required. DLRCC also determines that the proposed Cherrywood to Rathmichael Manor Rapid Build Cycle Scheme, individually or in combination with other plans or projects, without relying on any mitigation measures, will not have a significant effect on any designated European Sites, given their conservation objectives, and that there is no reasonable scientific doubt about this conclusion. Consequently, a Stage Two AA and a Natura Impact Statement (NIS) are not required.

Should An Bord Pleanála require any further information, please do not hesitate to contact Dún Laoghaire-Rathdown County Council.

Regards,



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Michèle Costello, Senior Executive Planner  
Active Travel Section, Dún Laoghaire-Rathdown County Council

## Appendix B



# Memorandum

Parks and Landscape Services, DLR Community and Cultural Development Department ,

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**From:** Deirdre O’Riordan, Executive Parks Superintendent, Parks Department  
Endorsed: Dara O’Daly, A/Senior Executive Parks Superintendent  
**To:** Julieanne Prendiville, Senior Executive Planner  
**Date:** 28<sup>th</sup> June 2024  
**Our Ref:** EM 13577

**Re: Parks Dept 2024 Report on the Landscape & Arboricultural Aspects of the Bray to City Centre Core Bus Corridor (CBC) Scheme**

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The proposed development has very significant impacts on the existing landscape character of the environs it will be constructed in, along the proposed 18.5km length of the scheme. There is a huge impact alone in the proposed loss of high value amenity trees which is envisaged at many locations along the length of the CBC, the route which travels from the N11 to Bray. Recommended conditions are outlined and generally apply to *the entire project* unless specific to a particular area or location. The NTA responses have been read. The layout changes relating to Shanganagh Park/cemetery, UCD Bus interchange, the Castle Farm entrance and more, resulting in higher existing tree retention, are welcomed, appreciated and should be replicated in additional sites for greater tree retention (and further improved in relation to Woodbrook; see Section 1.13). Finally, this report contains some repeated content from the previous October 2023 report issued from this Department, but also adds several new points and has re-structured the report layout somewhat.

### 1. Arboriculture

1.1 The loss of 410 existing trees of which 30 are Category A and 135 are Category B trees is extremely significant and a great pity. In the first instance at detailed design, it is essential that further consideration be given to some of the Category A (30 trees) & Category B (135 trees) trees whose removal is planned and outlined in the Preliminary Design Tree Removal Plan, which is based on the current layout. **There may be localised interventions that could aid the retention of these important trees which have taken the best part of a century or more to mature and have a very high value in terms of their contribution to climate mitigation, biodiversity, local heritage and landscape character.** An example is T0135, a Horse Chestnut (Category A tree) in Shanganagh Park where a pinch point in the width of the path/cycleway could facilitate its retention. There are several other similar examples in the scheme. This number of 410 trees for removal could be reduced. It is very important that all efforts are made to minimise the numbers of trees to be removed/felled and this can be achieved by the daily presence of an Arborist on-site, who would advise systems and strategies to retain trees wherever possible (cellular confinement, for example).

1.2 It is noted that the old DLR tree strategy was consulted for the original scheme design, entitled the DLR Trees 2011-2015 document, which is well out of date. The current iteration of this approved document is entitled DLR Tree Strategy: A Climate for Trees: Tree Strategy 2023-2030 and was adopted last year in 2023 by Council and is referred to throughout this report, particularly for both the retention of good trees wherever and however possible and also regarding the proposed tree planting and variety of species used.

1.3 There are many Tree Protection and Preservation Objectives in the DLR County Development Plan 2022-2028 which relate to trees in DLR County which would be affected by the proposed works. Thus, all efforts should be made to retain these trees by re-design, or as a last resort, by using any and all tested arboricultural

methods, as advised by the Project Arborist. Some examples of areas with these trees are Woodbank, Woodbrook, Beech Park, Shanganagh Park and Woodbrook Shankill.

**1.4 Condition:** Chapter 6 of the Arboricultural Impact Assessment & Method Statement Bray 20-079 Report must be strictly adhered to.

**1.5 Condition:** There must be a **qualified Arborist on site on a daily basis where site preparation, site clearance work and construction works are being implemented in the vicinity of trees to be retained on site, in order to ensure the Root Protection Zone is appropriately fenced and protected during site works as this is the greatest period of risk to the trees (RPA = Root Protection Area). Also, the Arborists presence is required to advise on sensitive works adjacent to trees as they unfold during the construction period and to assess these sensitive works on a case-by-case basis in deciding the best approach to protect the trees and ensure their survival and longevity.** No-dig cellular confinement systems are mentioned on the drawing sheets to protect existing trees from construction. The on-site Arborist will ensure that these interventions are correctly implemented.

1.6 The greatest unnecessary loss of trees happens as a result of the Root Protection Zones not being properly implemented or enforced, trees subsequently being damaged, tree safety being compromised and this results ultimately in extra unanticipated tree removals.

**1.7 Condition:** The Arboricultural Consultant must be involved in the detailed design stage as well as the construction stage to identify opportunities for retention of significant trees.

**1.8 Condition:** There shall be a tree bond of €1.5 million applied to protect the trees which are to be retained to ensure their safe retention. This is reflective of the importance and value of the trees located within the project area and is a very modest figure relative to the natural capital of the trees being retained (combined contributions to environment, heritage, history, aesthetics etc). The tree bond is an effective method of ensuring greater likelihood of adequate protection and supervision to ensure retention.

1.9 The majority of the trees scheduled for removal are significant in terms of maturity and it is essential that appropriate numbers of tree replacements are planted. This is covered by the DLR Tree Strategy - A Climate for Trees – Tree Strategy 2023-2030 (extracts below in italics) which details the importance of retaining the existing tree canopy in the first instance as the replacement trees take many years to attain the levels of environmental functions lost when mature trees are removed. **Detailed below are the relevant extracts from the DLR Tree Strategy 2023-2030:**

**DLR Tree Strategy Policy 7 - When consistent with planning objectives and conditions, the Council will use its powers, under the Planning and Development Act 2000, to ensure maximum and robust retention, conservation and management of trees, woodlands and hedgerows.**

**Policy 9 - An Arboricultural report is required for any planning application where there are trees, shrubs or hedges on site or outside the boundary within 20m of any construction works.**

**Policy 10 - The Council encourages new and replacement planting of trees on development sites and recommends that new plantings are in line with the above table or attempt to achieve a target of 18% canopy cover along with government and Council canopy cover targets.**

**Policy 11 - Where a tree of category A, B or C is to be removed then replacement trees should be proposed. Replacement trees should increase biodiversity, be an appropriate species for the location, and have a mature canopy spread equivalent to, or greater than, the tree(s) removed. The replacement tree should be no smaller than dbh 6.5cm (which means the diameter of the tree trunk at breast height, or at a height of 4.5 feet above ground), which means a girth of minimum 20 cm.**

**Policy 12 - Where a loss of trees occurs, a contribution towards offsite planting may be considered where it is shown that the site cannot accommodate replanting. This is to be developed as part of the supplementary planning publication on planning and trees.**

**Policy 13 - Protection of County value hedgerows and the provision of native hedgerows as part of the landscaping plan should be included in a development proposal. The consideration of how the hedgerows link to the surrounding landscape and enhance the Ecological Network should also be included in any development proposal.**

**1.10 Condition:** The Arboricultural Assessment must take into account the Policies listed the DLR Tree Strategy: A Climate for Trees: Tree Strategy 2023-2030.

1.11 Only if tree removals are still proposed in Shankill village and this section of the corridor is not being left as it currently is: The section of the route that navigates through Shankill Village has a significant negative impact on the existing mature tree population. The proposed juvenile tree replacements fail to adequately compensate for the local amenity, biodiversity, and environmental loss. Carbon sequestration associated with the mature tree population will be diminished considerably, with the replacement juvenile trees & species unable to meet the same sequestration for a minimum of 60-80 years, if at all (species selection-related). For much of Shankill Village and the roads serving the village, the CDP 2022-2028 has identified many of the trees stands for protection – please refer to the CDP maps.

1.12 It has to be emphasised that the removal of healthy mature trees directly contradicts many of DLR's policies set out in the CDP – chapters 4, 8 & 14, the Climate Change Action Plan, Biodiversity Action Plan, & the Tree Strategy and the dlr Tree Strategy - A Climate for Trees – Tree Strategy 2023-2030.

1.13 The proposal to remove a large stand of mature Category A & B trees on either side of the Woodbrook development is **absolutely unacceptable, thus DLR Parks Dept strongly opposes this and objects to it**. These trees are of very high quality and huge effort has been made to date with the developer of Woodbrook to successfully retain the trees here thus far during the Woodbrook planning process and design. Some existing trees along the East side of the road at Woodbrook would still be felled to facilitate the development, which is far from acceptable. **Very strong consideration should be given to the provision of a signal-controlled bus priority and not having a continuous bus lane in both directions as proposed; this would allow retention of trees on both sides of the road at Woodbrook.**

**1.14 Condition:** Alternative design solutions must be explored to enable the retention of the high quality trees on either side of the Woodbrook Development – **their loss is unacceptable.**

**1.15 Condition:** Detail of Shanganagh Cemetery boundary wall to consist of low stone wall & railing top. Liaise with Dlr Parks for approval on detail at detailed design stage. A new pedestrian entrance to cemetery at the southern-most corner of the boundary wall (53°13'12.7"N 6°07'12.3"W) along the Dublin Rd., connecting the footpath into cemetery should also be provided, details to be agreed with DLR Parks.

## 2. N11 / Stillorgan Road

2.1 The row of standard trees in the central median on the N11 needs to be continued. *Carpinus betulus* (Hornbeam) has been planted on the N11 median in the past and improves the visual amenity as well as providing other environmental benefits. Some additional species to Hornbeam to add into the proposed planting mix would be *Quercus robur* 'Fastigiata' (fastigate/narrow Oak), *Quercus palustris* 'Green Pillar' (also fastigate) and *Sorbus aucuparia* 'Autumn Spire'. The continuation of this median tree planting on the N11 is required, partly to mitigate against the extensive loss of trees throughout this development and to improve the vista along the N11. This is very achievable as the margin is of sufficient width for the most part – median width to accommodate tree planting is a minimum of 3 metres. The precise details of this planting are to be agreed with DLR Parks prior to the commencement of construction. Despite the requirement in the DLR Tree Strategy 2023-2030 for variety of species in proposed planting based on the 10/20/30 rule, piecemeal localised tree planting is to be avoided. The tree planting strategy should be coherent overall with thoughtful low repetition of tree species in similar layouts/areas as appropriate.

**2.2 Condition:** Appropriate sections along the central median along entire length of Stillorgan road should be considered for incorporating a BioSwale, collecting the surface run-off from the adjacent carriageways. Existing services can be incorporated within the construction detail of the bioswale – refer to NTA 'Greening & Nature-Based SuDS for Active Travel Schemes Advice Note.

## 3. Replacement Tree Planting

Compensatory or replacement planting is required when a tree in land is sought to be removed or damaged due to development or utility works. However, this should not be the first step, the starting point should be AVOID removal of trees which is best at the project planning stage, if this is not possible then Minimisation of the impacts by development or construction should be introduced. If neither of these is an option, then restoration should be considered and finally replacement or compensatory planting should be proposed.

3.1 The number of trees required to compensate for loss of existing trees depends upon the size of the trees to be lost. This is set out in the following table:

Trunk Diameter of Tree lost to development (cm measured at 1.5 metres above ground level)	Number of Replacement Trees
<i>Less than 15</i>	<i>1</i>
<i>15 – 19.9</i>	<i>2</i>
<i>20 – 29.9</i>	<i>3</i>
<i>30 – 39.9</i>	<i>4</i>
<i>40 – 49.9</i>	<i>5</i>
<i>50 – 59.9</i>	<i>6</i>
<i>60 – 69.9</i>	<i>7</i>
<i>70 – 79.9</i>	<i>8</i>
<i>80+</i>	<i>9+</i>

3.2 Furthermore the underplanting of these trees with successional bulb planting for the entire length of the median (not already planted with bulbs) should be an objective (with an emphasis on pollinator-supporting bulbs) as this intervention facilitates the public acceptance of long grass and vegetation for a considerable period of time and therefore greatly benefits pollinator species as well as being appreciated for its amenity value.

3.3 The minimum width of grass margin/median or planted areas is to be 1 metre. Anything narrower than 1 metre width is to be incorporated into the pavement/hardscape as it is not maintainable with conventional machinery. Previously this measurement was cited as a minimum width of 500mm, however we are increasing the minimum dimension in this report to 1 metre to ensure that there are no un-maintainable grassed or planted areas.

3.4 The size for Tree pits for new trees should be minimum 1200mm or 1.2 metres in each of the three directions (depth, width and length – thus 1.2m X 1.2m X 1.2m = 1.75 cubic metres) to ensure longevity of newly planted trees and the thriving of them long-term.

3.5 **The DLR Tree Strategy - A Climate for Trees –2023-2030 (published in October 2023)** (extracts below in italics) embraces the challenges posed by climate change and the following policies are critical and need to be taken on board within this development.

***Policy 16 The Council will endeavour to plant ‘The Right Tree in The Right Place’.***

***Policy 17 The Council will encourage planting a diversity of tree species, sizes and ages to build resilience in the urban forest carefully selecting native tree species as appropriate to ensure we do not adversely impact on our ecosystems and biodiversity, and non-native trees as street trees or specimen trees in parks.***

3.6 Until recently, it has been practice to plant mono-cultures to achieve uniformity and formality along streets and road, i.e. the same tree variety planted along the median or in grass verges. However due to climate change, trees are experiencing more stress and disease now than in the past- e.g Ash die-back is very prevalent resulting in all trees in a plantation or along a road dying over a season or two. (other diseases of concern here are Oak Processionary moth – which has severely impacted oaks in London and other UK and European cities, Bleeding canker of Horse Chestnut etc). Therefore, to prevent loss of entire avenues of trees more diversity in tree species, sizes and age is being recommended. The proposed plans do appear to indicate a lot of variety in the proposed tree planting.

This is achieved as follows:

*10-20-30 Rule: The rule suggests an urban tree population should include no more than 10% of any one species, 20% of any one genus, or 30% of any family.*

*Height to First Branch: The distance from the ground to the first branches of the tree canopy creates the visual and physical pathway that we view or walk under. By keeping this space equal between trees, the walking or viewing experience appears uniform between trees.*

*Tree size and shape: Planting similar sized trees and similar shaped trees beside each other will provide a fairly uniform view.*

**3.7 Condition:** Tree planting is to be maximized throughout the route corridor in lieu of existing mature trees being lost due to the proposed development. This should include road verges & central medians. Where space is limited, construction details consisting of CU Soils & extended growing area beneath footpaths / roads should be considered. Where underground services pose a constraint to tree planting, **root barrier solutions** shall be utilized to redirect future tree root expansion away from services, but this should not prevent tree planting from occurring i.e. N11 central median.

**3.8 Condition:** Tree species selection shall be determined by scale appropriateness, environmental conditions, and ground/ substrate conditions. The Tree schedule on the drawing needs to be reviewed & agreed with Dlr Parks prior to proceeding to commencement of construction works.

**3.9 Condition:** All landscape works shall have a 36-month, post planting maintenance period to ensure establishment. This shall form part of the contract for the landscape contractor appointed to carry out the installation of the landscape works.

**3.10 Condition:** Care needs to be taken to ensure that any new landscaping or tree planting does not impede visibility of traffic signal heads at junctions and pedestrian crossings.

**3.11 Condition:** All tree planting construction details shall incorporate route barriers to line tree pit trenches/pits to protect both services and adjacent surfaces. Growing substrate, aeration & irrigation details to be developed in collaboration with Dlr Parks Dept. Tree planting details to be agreed & signed off by Dlr Parks Dept prior to proceeding to construction phase.



#### **4. Specific Recommendations and Conclusion**

4.1 Please refer to attached Appendix for recommendations on specific locations along the route corridor.

4.2 The example of the re-routing of the cycle/foot-path into Shanganagh park to avoid removing existing good trees along both Shanganagh Park and Cemetery is welcomed, as it is for the UCD Bus interchange area which will save more existing trees and also the re-design at Crinken church etc. A similar approach should be taken in as many cases as possible along the entire 18.5km length of the scheme to prevent/reduce the numbers of removals of both the Category A trees (35 no.) and the Category B trees (130 no).

4.3 In conclusion, the proposals should exhaust every avenue to retain the maximum number of healthy mature trees, while planting new trees at every available opportunity. To remediate against the removal of mature trees is extremely difficult to achieve even with multiplied factor planting, as per the table in Section 3.1. The associated front loading of costs to achieve the preferred maximum retention of existing trees will, over time, prove to be prudent forward planning to help tackle the Climate Change emergency and also preserve the existing wealth of natural capital the trees provide in terms of soil sequestration, air purification, heritage, history, aesthetics/beauty and biodiversity.