To the Lord Mayor and Members of Dublin City Council Report No. 191/2017 Report of the Chief Executive



- (a) Planning and Development Act 2000 (as amended) & Planning and Development Regulations 2001 (as amended) (Part 8)
- (b) Local Government Act 2001

In compliance with the provisions of Section 179 of the Planning and Development Act 2000 (as amended) and Part 8 of the Planning and Development Regulations 2001 (as amended) and in compliance with the provisions of the Local Government Act 2001 and pursuant to the requirements of the above, notice is hereby given of Dublin City Council's intention to carry out the following works:

(A) The Site

The site is the Causeway Road that provides access to Bull Island

(B) The Proposal

The proposal is to regularise car-parking on Causeway Road by reducing the width of the carriageway and replacing existing parking spaces with diagonal parking spaces at 45 degrees from the road alignment. The current car-parking capacity on the Causeway Road is approximately 450 parking spaces, however this involves using the entire length of the Causeway Road for parking. The proposed works will provide an equivalent capacity within a closer proximity to the beach, reducing the need to use the remainder of the Causeway Road for parking. Car-Parking capacity could be increased to approximately 600 parking spaces if the entire length of the Causeway Road was included.

The existing carriageway is to be narrowed from its approximate 10.8m width to 6m which is standard for vehicular access. This will involve reducing in width the earth bunds which were put in place some years ago to prevent unauthorised encampments. The parking bays will be resurfaced in a 'honeycomb' geotextile, which will allow these areas to colonise with the natural vegetation of the Island. The permeable nature of this surfacing over tar macadam will also alleviate issues with surface run-off. This type of carpark surface has successfully been used at Airfield, Dundrum, Farmleigh and Malahide Castle.

The installation of a 'honeycomb' geotextile as a replacement for tar macadam under the parking areas provides a larger area for rainwater to percolate. In addition, it is proposed to provide a Geotextile layer which acts as a filter for hydrocarbons. The fibres of the geotextile encourage the growth of a microbic biofilm habitat. These microbes biodegrade any organic matter found in the run-off, with a capacity to consume 400g of hydrocarbon per annum. Currently, all surface water runoff from the Causeway Road is directed to the side of the roadway and drains to the soil berm at each side. The proposed works will improve the current situation on Causeway Road by providing a filter and retention of any hydrocarbons that are mixed with the rainwater.

In addition, it is proposed to construct ten new disabled parking spaces on the southern link road from the roundabout to the beach. This is to facilitate access to the beach for those with impaired mobility. It will involve the relocation of existing dune habitat on the southern link road to the mitigation area (this is an area of equivalent size further along the link road towards the beach where the existing carriageway will be narrowed and macadam removed to promote success of relocation). There will be no habitat loss as a result. The parking bays will be resurfaced in a 'honeycomb' geotextile, which will allow these areas to colonise with the natural vegetation of the Island. A macadam surface will be provided between each parking space to facilitate egress from cars.

A new gate will be erected to the south of the new disabled parking spaces on the link road to prevent vehicular access to the beach.

(C) Site Planning History

No relevant planning history recorded

(D) Area Committee

At the July 2016 meeting, the North Central Area Committee were informed of the commencement of a Part 8 application for this project.

At its meeting held on 15th May, 2017, the North Central Area Committee were presented with a report which recommended proceeding with the development. This report was agreed by the North Central Area Committee.

(E) Statutory Submissions/Observations

Submissions/Observations

Four have been received from the following groups/bodies,

Minister for Arts, Heritage, Regional, Rural and Gaeltacht Affairs; St. Anne's Golf Club, North Bull Island; Save Our Seas; Clontarf Residents Association and issues are summarised as follows:

Minister for Arts, Heritage, Regional, Rural and Gaeltacht Affairs

Concerns relating to grassed areas/dunes, timing of the project and scale and protection of natural habitat.

St Anne's Golf Club, North Bull Island

Deficiencies are identified in the proposal, which the observer states is the replacement of a less-than-perfect existing traffic and access solution with another less-than-perfect scheme. They have proposed an alternative solution including amongst other things the relocation of proposed parking, additional parking, and a new junction for their own site. They also have proposed improvements to DCC's own scheme if the observer's own alternatives are not considered acceptable at this time.

<u>Save Our Sea Front – Representative Sutton to Sandycove Interim Works, Environmental Monitoring & Liaison Committee</u>

The observer notes the benefits for disabled and elderly of close access to beaches and wider health benefit for citizens. They note that beyond providing 10 additional disabled spaces the parking is not closer to the beach access – which will be over 400m away. The beach was available for parking until relatively recently, with parking being reduced on the link roads. Reference is made to a study which notes that parking on beaches does not

affect the biosphere. It is suggested that on-beach parking should be reinstated, but perhaps closing it off on summer weekends or over the entire summer period.

Clontarf Residents Association (CRA)

The geotextile treatment and the possibility that the car parking will naturalise over time, the provision of additional disabled parking space closest to the beach, and proposed mitigation measures are welcomed.

Concern is raised at the carriageway way width – but could be lessened if a dedicated cycle track is implemented. There is an awareness that this is being proposed but details have not been disclosed – which should be provided and then more time allowed for observations to be made.

The proposal does not address the loss of access to the beach, with suggestions to reopen car parks perhaps for limited periods. Other potential users in addition to disabled permit holders have access/mobility issues also. There has been a long tradition of directly accessing beaches.

The subject Part 8 proposal was not sufficiently on display in local venues. Public consultation issues regarding the nearby S2S Part 8 proposal have been well flagged and DCC should move on from complying solely with the letter of Planning Law. The CRA and Clontarf.ie should have been advised of the proposal. It is noted that an Environmental Monitoring & Liaison Committee as proposed for the aforementioned S2S Part 8 should have been used as a vehicle for public consultation for the subject Part 8 proposal. The observer states that they are available to meet with DCC representatives in relation to the subject proposal and other matters relevant to the Clontarf/Dollymount area.

The issues raised have been considered and are dealt with in the evaluation of the application.

(F) Evaluation/Assessment

Appropriate Assessment:

The project areas lie within the North Dublin Bay Special Area of Conservation and the North Bull Island Special Protection Area. There will be no habitat loss or fragmentation as a result of the project. Best practice in the relocation process will be implemented to ensure that the integrity of the dune habitat is maintained insofar as possible and incidental damage is minimised. The 'honeycomb' geotextile will improve the current situation on Causeway Road by providing a filter and retention of any hydrocarbons that are mixed with the rainwater. There will be no encroachment by machinery or works onto any Annex habitat. Construction will take place at an appropriate time when there will be no impact on the Special Conservation Interests of the Special Protection Area. On this basis, the Screening for Appropriate Assessment concludes that the proposed works will not have any significant cumulative, direct or indirect impacts upon any of the Natura 2000 Sites.

2016-2022 Development Plan policies/objectives:

- CEE12: (i) To promote and facilitate tourism as one of the key economic pillars of the city's economy and a major generator of employment and to support the provision of necessary significant increase in facilities such as hotels, apart hotels, tourist hostels, cafes, and restaurants, visitor attractions, including those for children
- CHC43: To protect and improve the city's cultural tourism amenities and the natural and built environment that forms the basis of Dublin city's attractiveness for tourists, including niche tourism products.
- 2.3.9 Conservation, Culture and Heritage

- GIO4: To improve pedestrian and cycle access routes to strategic level amenities while ensuring that ecosystem functions and existing amenity uses are not compromised and existing biodiversity and heritage is protected and enhanced.
- GIO7: To promote the city landscapes, including rivers, canals and Bay, as a major resource for the city and forming core areas of green infrastructure network.
- GIO9: To maximise managed access to key landscape and amenity areas of Dublin city.
- 10.5.4 Rivers, Canals and the Coastline
- GI17: To develop sustainable coastal, estuarine, canal and riverine recreational amenities to enhance appreciation of coastal natural assets in a manner that ensures that any adverse environmental effects are avoided, remedied or mitigated.
- 10.5.5 Dublin Bay
- GIO22:To promote and upgrade visitor facilities at North Bull Island to raise awareness of biodiversity and promote nature conservation and manage recreation sustainably, having regard to Article (6) of the Habitats Directive.
- 10.5.8 Sport, Recreation and Play

Interdepartmental Reports

Drainage Division, Engineering Department: No objections subject to compliance with recommended conditions

Roads & Planning Traffic Division:

The site of the proposed perpendicular parking is located adjacent to the entrance to St. Ann's Golf club. The proposal will result in reduced sightlines for traffic turning right out of the access road and onto Causeway Road. It is recommended that the proposed perpendicular car parking be relocated northwards to allow for 45m sight distances (50kph road) in accordance with DMURS.

The Roads and Traffic division recommends that the proposed perpendicular car parking on Causeway Road shall be relocated northwards to allow for 45m sight distances (50kph road) in accordance with DMURS.

Response to Submissions/Observations.

1. Submission from the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs

No works will be carried out on the grass area at the rear of the footpath on both the north and south sides of the Causeway Road.

With regard to the timing of the works, it is noted that certain parts of the site are more sensitive to bird disturbance, e.g. where the Causeway Road abuts the north and south lagoons, with other areas being less sensitive, e.g. the Causeway Road to the south-east of the Royal Dublin Golf Club entrance and the proposed disabled parking location on the link road.

The latter areas will be prioritised for works during late Spring (from late March when many of the wintering birds will have migrated), with specific dates to be determined based on on-site checks for the presence or absence of birds. Works on other parts of the Causeway Road will be undertaken when wintering and migratory birds have left the Island.

With regard to the specific methods to be used to relocate the white dune habitat, the preparation of the mitigation area will be the first priority. The area will be marked out and cordoned off, and the existing macadam will be removed to aid success. The dune habitat will be relocated in blocks (lifting from the bottom to retain its root structure insofar as possible) using specialized machinery and machine operators. The dune habitat will be relocated in sequence in order to facilitate an appropriate habitat structure. The following diagram is indicative only.

Removal Sequence - Relocation Sequence

13	14	15	16
5	6	11	12
3	4	9	10
1	2	7	8
Road			

Dune	Bank				
1	3	5	6	11	7
2	4	9	10	12	8
	13	14	15	16	

Temporary holding/reinforcement infrastructure will be put in place to minimise erosion impacts and to allow time for the marram grass to strengthen the structure of the habitat.

Following the completion of works, the relocated habitat will be monitored over a five year period by the Island Manager to ensure that relocation is successful.

2. Submission from St Anne's Golf Club:

As recommended by the Roads and Traffic Division, the proposed perpendicular car parking on Causeway Road will be relocated northwards to allow for adequate sightline for traffic turning right, coming out of the access road from St. Anne's Golf club, in accordance with DMURS.

The proposed Alternative Golf Club Access Layout includes the removal of a large area of Annex 1 habitat, but does not include any proposed compensatory measures for same. This proposal is not recommended.

With regard to the Special Speed Limit, it is considered appropriate that a reduced speed limit is implemented on Causeway Road. This will be investigated further as part of the general management of North Bull Island, but is not considered necessary with regard to this project.

The proposed Public Lighting has the potential to impact the protected species on the Island, and as such it is not recommended to include same.

3. Submission from Save Our Seafront:

As noted in the Part 8 report, the access concerns raised in the submission relate to a response to traffic management and public safety issues at North Bull Island, as requested by An Garda Síochána.

The proposed works will provide an equivalent car-parking capacity on the Causeway Road within a closer proximity to the beach than currently exists.

Set down spaces have been provided at the roundabout to allow people to be dropped off before the driver parks the car at some location on Causeway Road.

4. Submission from Clontarf Residents Association

With regard to carriage width, it is noted that the standard carriageway width on Local streets should be between 5-5.5m (i.e. with lane widths of 2.5-2.75m) as per DMURS. The proposed carriage width on the Causeway Road will be 6m. It is noted that this proposal concerns car-parking only, and not the provision of cycle tracks.

With regard to the timing of the works, it is noted that certain parts of the site are more sensitive to bird disturbance, e.g. where the Causeway Road abuts the north and south lagoons, with other areas being less sensitive, e.g. the Causeway Road to the south-east of the Royal Dublin Golf Club entrance and the proposed disabled parking location on the link road.

The latter areas will be prioritised for works during late Spring (from late March when many of the wintering birds will have migrated), with specific dates to be determined based on on-site checks for the presence or absence of birds. Works on other parts of the Causeway Road will be undertaken when wintering and migratory birds have left the Island.

As noted in the Part 8 report, the access concerns raised in the submission relate to a response to traffic management and public safety issues at North Bull Island, as requested by An Garda Síochána.

The proposed works will provide an equivalent car-parking capacity on the Causeway Road within a closer proximity to the beach than currently exists.

Set down spaces have been provided at the roundabout to allow people to be dropped off before the driver parks the car at some location on Causeway Road.

With regard to consultation, it is noted that the statutory requirements for same were complied with in full. It is further noted that prior to the Part 8 application process, draft proposals for car parking and access to the North Bull Island were placed on public display in the Red Stables, St Anne's Park, from July 18th 2015 for a period of three months, the proposals were circulated to all area councillors, and a report was prepared for the North Central Area Committee.

Planning Division comment as follows:

As noted the proposal involves:

- reducing the width of the carriageway and grass berm;
- replacing existing parking spaces with diagonal parking spaces on "honeycomb" geotextile;
- relocation of existing dune habitat on the southern link road to the mitigation area (this is an area of equivalent size further along the link road towards the beach where the existing carriageway will be narrowed and macadam removed to promote success of relocation);
- provision of 10 new disabled parking spaces on "honeycomb" geotextile with macadam surface in between spaces to facilitate egress from cars - located on the southern link road from the roundabout to the beach;
- Erection of new gate to the south of the new disabled parking spaces on the link road.

It is considered in this instance that due to the limited nature of the proposed intervention in the receiving landscape setting, as mitigated by the proposed landscaping and use of materials, that the proposal will have a minimal impact on the visual amenities of the area. As noted the project area lies within the North Dublin Bay Special Area of Conservation (SAC) and the North Bull Island Special Protection Area (SPA).

Under Article 6 (3) of the EU Habitats Directive and Regulation 30 of SI no. 94/1997 "European Communities (Natural Habitats) Regulations (1997)" any plan or project which has the potential to significantly impact on the integrity of a Natura 2000 site (i.e. SAC or SPA) must be subject to an Appropriate Assessment. This requirement is also detailed under Section 177 (U) of the Planning and Development Act 2000 (as amended). In this instance the proposal has been screened out for Appropriate Assessment by the proposer's Natura Impact Statement as per the requirements of the Habitat's Directive.

As per Schedule 7 of the Planning & Development Regulations 2001 (as amended) it is considered that an EIS in this instance is not necessary for the subject proposal considering the relatively modest scale of development proposed in this instance.

The proposer notes that their work program will seek to minimise bird disturbance, and they have also taken cognisance of the amendments recommended by the Roads & Traffic Planning Division.

The Planning Division has no objection to the proposed scheme of works as it is considered that the proposal and its various elements are compatible with the *permissible use* categories for development on lands zoned Z9 'Amenity/Open Space Lands/Green Network' and the relevant objectives and policies of the 2016-2022 Dublin City Development Plan.

Recommendation:

The proposed development has been assessed and it is considered consistent with the provisions of the Dublin City Development Plan 2016-2022 and would be in accordance with the proper planning and sustainable development of the area. Accordingly it is recommended that a decision be made by the elected members of the Council to proceed with the proposed development without modification subject to the requirements of the drainage division as outlined below.

- The development shall comply with the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0 (available from www.dublincity.ie Forms and Downloads).
- The development shall incorporate Sustainable Drainage Systems in the management of stormwater. Full details of these shall be agreed with Drainage Division prior to commencement of construction.
- The Roads and Traffic division recommends that the proposed perpendicular car parking on Causeway Road shall be relocated northwards to allow for 45m sight distances (50kph road) in accordance with DMURS.

This report is submitted to the City Council pursuant to Section 138 of the Local Government Act, 2001 and Section 179 of the Planning and Development Act, 2000, subject to the provisions of Section 139 of the Local Government Act, 2001.

Owen P. Keegan
Chief Executive

Date 18th May 2017





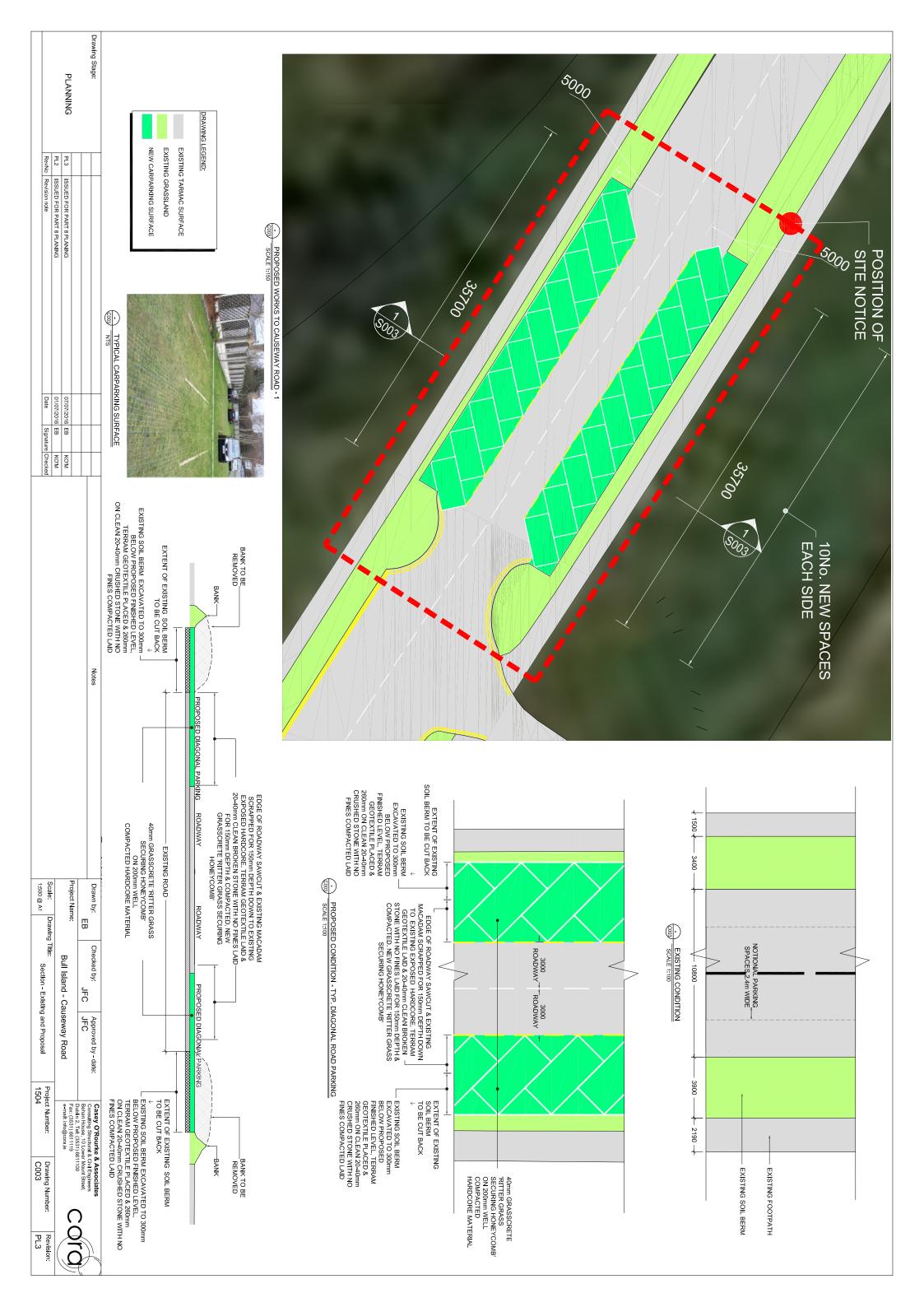
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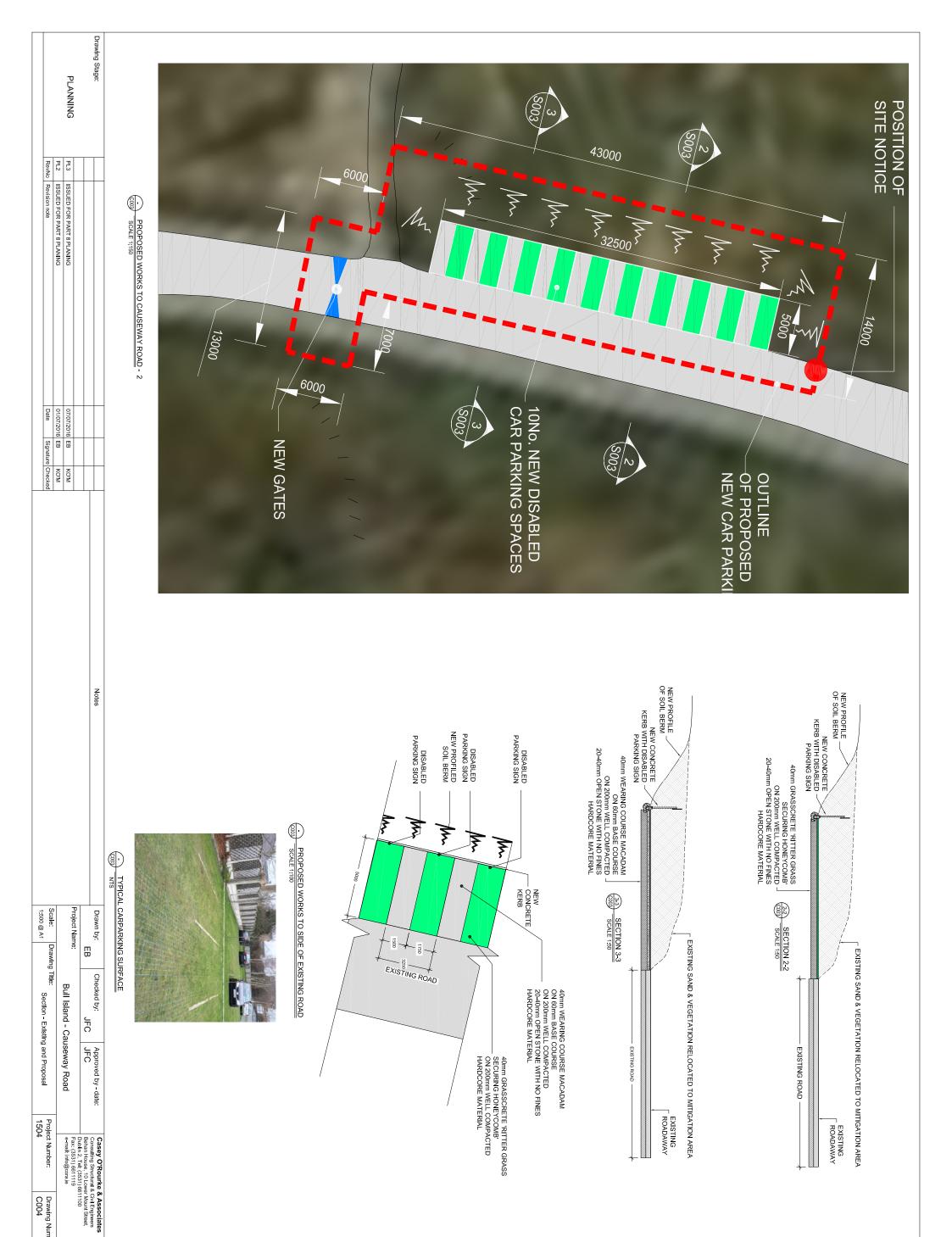
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EB JFC JFC JFC Consulting Structural & Civil Engineers EB JFC JFC JFC Dublin 2, Tel. (233) 6611100 Project Name: Project Name: Project	PLANNING PL3 ISSUED FOR PART 8 PLANING
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