# To the Lord Mayor and Members of Dublin City Council

Report No. 234/2023 Report of the Chief Executive



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:

**Application No:** 4110/23

Proposal: LAW: Planning and Development Act 2000 (as amended) Planning and

Development Regulations 2001 (as amended) - Part VIII

**Applicant:** Environment and Transportation Department

**Location:** The location of the Part 8 development is on the banks of the Royal

Canal immediately adjacent to Binn's Bridge/Dorset Street Lower,

Dublin 1.

**Proposal:** Pursuant to the requirements of the above, notice is hereby given of the

proposed amendment of approved Part 8 Application ref. 2870/15. Binns Bridge is a Protected Structure under the Record of Protected Structures within the Dublin City Development Plan 2022-2028 (RPS Ref. No. 908). Dublin City Council proposed to carry out the following

development:

The reduction of the ramp gradient to 4.99% along the entirety of its length;

the offset of the greenway from the boundary of the Portland Lock apartments by approximately 1.3-1.5 metres, in order to protect the integrity and function of the basement level vents fronting the towpath and for the amended and security of the ground floor apartments. The offset space will comprise of a narrow maintenance path and a soft landscaping strip;

The greenway will operate as a 4.6metre wide shared space for the majority of the area, tying back to the previously permitted cross sections at either end:

The removal and replacement to all existing railings, fences and gates in the area:

revision of stair access to the lock under Binns Bridge to provide additional stepped seating and soft landscaping to provide an improved public realm area;

Resurfacing of area surrounding the lock gate and provision of lighting and railings;

Ramp to be constructed using sheet piling and appropriate stone cladding:

Removal of an existing canal jetty and replacement in a new location to match the existing design;

minor additional features including removal of portion of the wall adjacent to Binns Bridge (but which does not form part of the Protected Structure) to provide a public bench, the removal of existing kissing gates and barriers, provision of public lighting, CCTV, potential relocation of existing services, associated works and associated ancillary services. The works do not impact the existing underground gas installation in the area.

An Appropriate Assessment Screening has been undertaken in accordance with Habitats Directive (92/43/EEC). An Environmental Impact Assessment Screening has been undertaken in accordance with EIA Directive (2014/52/EU) and concludes that there is no real likelihood of significant effects on the environment arising from the proposed development and a determination has been made that Environment Impact Assessment (EIA) is not required.

#### **Site Notice:**

Site notices in situ and legible on date of inspection

## **Zoning/ Site Designations:**

Under the current Development Plan, where the existing towpath is situated is zoned Z9, the objective of which is 'To preserve, provide and improve recreational amenity and open space and green networks'. The Royal Canal including Binn's Bridge is also located within a Conservation Area.

The canal water body is zoned Z11 'To protect and improve canal, coastal and river amenities.' The purpose of the zoning is to protect the amenity and integrity of these areas, including views and prospects into/out of the areas. The coast, canals, and rivers play a role in contributing to the development of a strategic green and blue network and also provide for critical flood management and climate adaptation infrastructure.

The Dublin City Development Plan 2022-2028 designates the Royal Canal as a red hatch conservation area. The Royal Canal, including the various locks, boundary walls and structures, all fall within the conservation area designation.

Binn's Bridge is included in the Record of Protected Structures (RPS) Ref. No. 908 (and does not make a distinction between the canal bridge and the railway bridge), and is included in the National Inventory of Architectural Heritage (NIAH):

Canal Bridge Reg. No. 50060189 with a Regional Rating and Categories of Special Interest cited as Architectural, Social and Technical (b.1769), Railway Bridge Reg. No. 50060296, also with a Regional Rating and Categories of Special Interest cited as Architectural, Social and Technical (b.1864) and 2nd Lock Royal Canal Reg. No. 50060188 with a Regional Rating and Categories of Special Interest cited as Architectural, Social and Technical (b.1795).

The Dublin City Industrial Heritage Record (DCIHR) has two entries for the subject site - Binn's Bridge and the 2nd Lock.

#### Site Location:

The location of the Part 8 development is on the banks of the Royal Canal immediately adjacent to Binn's Bridge/Dorset Street Lower, Dublin 1.

# **Proposed Development:**

The central purpose for the public realm improvement works as part of this Part 8 proposal is to upgrade the existing tow path in this area as part of the overall Royal Canal Greenway project in accordance with the standards set out in the National Cycle Manual and Design Manual for Urban Roads and Streets:

- The tow path is approximately 4m in width and at this point experiences a significant change upon entry to Dorset Street by way of a relatively steep gradient far in excess of the required 5% (1/20) from ramps as per the National Cycle Manual. The standards need to meet the National Cycle Manual and Design Manual for Urban Roads and Streets.
- Relocation of the existing canal jetty
- Potential relocation of existing services and the provision of new services including public lighting/CCTV etc.

## **Site Planning History**

2870/15: Part 8 application approved for the Royal Canal Greenway - Sheriff Street Upper, Dublin 1 to Ashtown, Dublin 15 constructed by Dublin City Council of the above scheme, consisting of three phases. Phase 2 to 4 inclusive. Please note that Phase 1 running from Guild Street to Sheriff Street Upper is already constructed. Phase 2: Sheriff Street Upper, Dublin 1 to North Strand Road, Dublin 1.

The proposed works shall comprise the construction of circa 520m of cycle and pedestrian route and landscaping between Sheriff Street Upper, Dublin 1 and the Ossory Road Railway Bridge along the western bank of the canal; c. 177 m of earth ramp and 7 span concrete bridge between Ossory Road Railway Bridge and North Strand Road (Newcomen Bridge - Protected Structure), Dublin 1. Phase 3: North Strand Road, Dublin 1 to Phibsborough Road, Dublin 7. The proposed works shall comprise the construction of c. 2.1 km cycle and pedestrian route from North Strand Route (Newcomen Bridge - Protected Structure) to Phibsborough Road. The route shall traverse past Clarke's Bridge and Binns Bridge, both Protected Structures. Toucan (pedestrian and cycle) crossings shall be provided at the following locations: North Strand Street / Newcomen Bridge; Summerhill Parade/ Clarke's Bridge; Russell Street / Russell Street Bridge: Drumcondra Road Lower / Binn's Bridge: Phibsborough Road / Cross Guns Bridge. Two new pedestrian / cycle bridges and associated ramps are proposed to facilitate the route at Croke Park south east of Russell Street and at the 3rd Royal Canal Lock. Phase 4: Phibsborough Road, Dublin 7 to Ashtown, Dublin 15. The proposed works shall comprise the construction of c. 4.3 km of cycle and pedestrian route from Phibsborough Road, Dublin 7 - Cross Guns Bridge to Ashtown, Dublin 15 along the northern towpath. The works traverse past Broome Bridge (Protected Structure) and H.S. Reilly's Bridge (Protected Structure). A Toucan (pedestrian and cycle) crossing is proposed at Broombridge Road/ Broome Bridge. In addition, for all 3 Phases of the Scheme the proposed works shall include: the provision of new public lighting, CCTV, gateways to prevent inappropriate motor vehicle

access and other ancillary services along the entire route. An Ecological Report and Built Heritage & Conservation Report accompany this application.

### **Submissions/ Observations**

Prescribed Bodies:

Department of Housing, Local Government and Heritage

#### Nature Conservation

With regards to the proposed Part 8 amendment, this Department's main concern from a nature conservation perspective is that the proposed alterations to the ramp from the canal tow path up onto Lower Dorset Street at the southern end of Binns Bridge do not in any way hinder otter access to and movement across this street up and down the Royal Canal.

The otter, a species subject to a system of strict protection under the Habitats Directive (92/43/EEC) is as mentioned in the Environmental Impact Screening Assessment supporting the present application as being known to occur on the Royal Canal, though, as reported in this document, during a walkover ecological survey of the area undertaken in April of this year no evidence of the presence of otter was found in the vicinity of Binns Bridge. Several other ecological surveys carried out along the Royal Canal in recent years are also referred to in this assessment, but the authors appear to be unaware of the otter survey of the canal from the M50 to the Liffey undertaken in January 2022 by Triturus Environmental Ltd (Royal Canal Greenway Cycle and Pedestrian route (Phibsborough to Ashtown) Otter Survey, Triturus March 2022), which was commissioned on behalf of Dublin City Council by Roughan O'Donovan consultants to the council in relation to the development of Phase 4 of the Royal Canal Greenway and a copy of which is attached to this submission. During this survey otter spraint was recorded at three sites on the north bank of the Royal Canal at Clonliffe Road Bridge and Croke Park circa 700 m downstream of Binns Bridge and on Level 2 of the canal which stretches up to the latter bridge.

On the other hand the Triturus survey recoded no otter signs on the canal between the 2<sup>nd</sup> and 6th locks, and it was noted that there were no otter accessible ladders or ledges at the 2nd or 1st Locks and that these locks therefore formed restrictions to otter movement along the canal forcing otters to circumnavigate them by crossing footpaths and roadways. The absence of the route ways for otters to move past the 2nd and 1st Locks without them having to traverse roads is explained by the locks' locations immediately upstream and adjacent to Binns Bridge and Newcomen Bridge (on the North Strand) respectively.

The 5th Lock at Cross Guns Bridge, the next bridge up the canal from Binns Bridge is referred to in the Triturus report with other locks as accessible to otters to move around in contrast to the 2nd and 1st Locks. In fact this is incorrect and the location of the 5th Lock immediately upstream of and adjacent to Cross Guns Bridge certainly prevents any move by otters upstream around it without them having to having cross Phibsborough Road, and very likely prevents any movement downstream without crossing this road as well. Despite the restriction to otter movements that the location of the 5th Lock adjacent to Cross Guns Bridge poses, an otter road casualty at Cross Guns Bridge reported in the autumn of 2022 suggests that otters do at least sometimes (presumably at night) attempt to move up and down the Royal Canal past this lock. It is strongly suspected that otters similarly on occasion circumnavigate the 2nd Lock by at Binns Bridge by crossing Lower Dorset Street between the sections of tow path on either side of the bridge at its southern end. In order to facilitate such movements to continue it is important therefore that the new configuration of the ramp up to Lower Dorset Street preserves at least the present level of accessibility for otters as the current configuration.

However, the Department considers it would be more desirable that as a biodiversity enhancement measure, and to some extent compensate for the adverse effects on the otter population likely to result from increased disturbance associated with the construction of the greenway, a new route for otters to pass the 2nd Lock without having to traverse Lower Dorset Street be provided. From an examination by a staff member of the National Parks and Wildlife Service (NPWS) of this Department of the configuration of the 2nd Lock to Binns Bridge it appears it may be feasible to install a ledge or pipe under the bridge on the northern, railway side of the canal, to allow passage of otters around the 2nd Lock without them having to cross Lower Dorset Street.

A somewhat similar approach was taken at 12th Lock on the Grand Canal in recent years when a bridge which carried the R136 Lucan to Newcastle Road across the canal was replaced, and a pipe was inserted under the new road carriageway at one end of the bridge to allow otter movement around the 12th Lock adjacent to the bridge without having them having to traverse the R136 in future. While the same arrangement would not be acceptable at Binns Bridge because of the architectural significance and protected status of the bridge, the construction of a ledge or pipe past the lower lock gate down to the canal level under the bridge might be possible to facilitate otter movement around the 12th Lock and, in the opinion of the Department, the feasibility of installing such an otter bypass deserves investigation.

The Department also considers it would be desirable to install one or more artificial otter holts on Level 2 of the Royal Canal below Binns Bridge, and possibly in addition on Level 3 or Level 4 above the bridge, as another biodiversity enhancement measure to compensate for the increased disturbance of otters likely to result from the operation of the greenway. Such an approach was adopted when the Grand Canal Green Way was laid out from Inchicore to the 12th Lock and a series of artificial holts was installed with the permission of Waterways Ireland along the Grand Canal from Park West at Gallanstown to Clonburris below the 12<sup>th</sup> Lock. On the Royal Canal 2nd Level below Binns Bridge, the most suitable location for an artificial holt would probably be in the northern railway side canal bank close to the otter sprainting sites identified at Croke Park, but otters might possibly also use a holt sited under the greenway on the canal's southern bank if it was of suitable design.

Transport Infrastructure Ireland

Section 49 Contribution Scheme Levy be applied as a condition of a grant of permission

Waterways Ireland

Letter of support and consents to the inclusion of the proposals as part of the Part 8 process

Third Parties:

There were 12 no. third party submissions received.

### Main points:

- Requests that as much green space/reeds etc along the canal be preserved and that building work be done as quickly as possible
- Concern re closure of canal path for a long time
- A non-black tarmac finish would be preferable
- Consider planting a tree on main Drumcondra road intersection/take opportunity for greening this paved area when there are major works being done.
- The real potential of the interface at Binn's Bridge appears to be threatened by a lack of meaningful coordination and failure to consider the bridge itself despite its Protected Structure status and aesthetic design of the wider junction.

- The three proposed infrastructure projects Dart Plus West, The Swords Bus Corridor and the Canal Greenway Project offer the opportunity to greatly enhance this junction as a gateway node into the city
- Recommend that the scope of these Part 8 works be extended or that a follow on project utilise this design team taking the Canal Greenway Project and the two other NTA projects and produce a co-ordinated design for this important place.
- The improvements will make the towpath more accessible and safer. Suggest also creating an entry to the towpath from the Portland Place Park. This additional permeability would further enhance the proposed works
- Pedestrian path needs to be wider too narrow to allow groups to pass each other
- Concern re accessibility for disabled persons
- Needs to be consideration for the potential for antisocial behaviour in this area. Proper lighting, litter collection, stopping dereliction in this strip is essential. The foxes mural is beautiful and needs protection from graffiti.
- Appropriate signage required signs to say "cycle on right, walk on left" to alert pedestrians to oncoming cyclists
- Why not have a segregated path for the full length of the ramp and not just the lower section beyond the bollards
- The footpath on the bridge on the east side also should aligned with the path on Drumcondra Road as cyclists can get squeezed out and it means cyclists invariably then go up on the path to avoid car traffic
- Please ensure there are no gates and access is kept for existing ways and new facilities listed are added

The submissions received have been considered in the assessment of this application.

# **Interdepartmental Reports:**

- **Drainage Department:** No objection subject to recommended conditions. Condition attached.
- **Transportation Planning Division:** No objection subject to recommended conditions. Condition attached.
- Conservation Section: No objection, subject to recommended conditions attached

### **Development Plan Policy/Ministerial Guidelines**

**Development Plan Context:** The City Development recognises the strategic importance of the development of the Metropolitan Greenway Network connecting Dublin Bay to the wider region / Dublin Mountains which is progressing through the city.

# **Policy GI8** Metropolitan Greenways

To support the development of Metropolitan Greenways connecting Dublin Bay to regional and national greenway projects, subject to careful routing and design to ensure ecological functions are maintained and existing biodiversity and heritage is protected and enhanced. The delivery of Metropolitan Greenways is identified in the National Planning Framework as one of the key enablers for the growth of Dublin City.

### Objective GIO6 Metropolitan and Local Greenways

To support the development of the following metropolitan greenways and local cycleways / walkways:

 Royal Canal and the Grand Canal (including the inner Grand/Royal canal loop linking the two canals via the Phoenix Park).

## Policy SMT16 Walking, Cycling and Active Travel

To prioritise the development of safe and connected walking and cycling facilities and prioritise a shift to active travel for people of all ages and abilities, in line with the city's mode share targets.

## **Objective SMT08** Cycling Infrastructure and Routes

To improve existing cycleways and bicycle priority measures and cycle parking infrastructure throughout the city and villages, and to create protected cycle lanes, where feasible. Routes within the network will be planned in conjunction with green infrastructure objectives and the NTA's Cycle Network Plan for the Greater Dublin Area, and the National Cycle Manual, having regard to policies GI2, GI6 and GI8 and objective GI02.

## **Objective SMTO9** Greater Dublin Area Cycle Network Plan

To support the development of a connected cycling network in the City through the implementation of the NTA's Greater Dublin Area Cycle Network Plan, subject to environmental assessment and route feasibility.

# Policy SMT8 Public Realm Enhancements

To support public realm enhancements that contribute to place making and liveability and which prioritise pedestrians in accordance with Dublin City Council's Public Realm Strategy ('Your City – Your Space'), the Public Realm Masterplan for the City Core (The Heart of the City), the Grafton Street Quarter Public Realm Plan and forthcoming public realm plans such as those for the Parnell Square Cultural Quarter Development and the City Markets Area. Designated Conservation Areas include extensive groupings of buildings, streetscapes and associated open spaces and include (parts of) the medieval/walled city, the Georgian Core, the 19th and 20th century city, and the city quays, rivers and canals.

# Policy BHA9 Conservation Areas

To protect the special interest and character of all Dublin's Conservation Areas – identified under Z8 and Z2 zoning objectives and denoted by red line conservation hatching on the zoning maps. Development within or affecting a Conservation Area must contribute positively to its character and distinctiveness and take opportunities to protect and enhance the character and appearance of the area and its setting, wherever possible.

## Enhancement opportunities may include:

- 1. Replacement or improvement of any building, feature or element which detracts from the character of the area or its setting.
- 2. Re-instatement of missing architectural detail or important features.

- 3. Improvement of open spaces and the wider public realm and reinstatement of historic routes and characteristic plot patterns.
- 4. Contemporary architecture of exceptional design quality, which is in harmony with the Conservation Area.
- 5. The repair and retention of shop and pub fronts of architectural interest.
- 6. Retention of buildings and features that contribute to the overall character and integrity of the Conservation Area.
- 7. The return of buildings to residential use.

Changes of use will be acceptable where in compliance with the zoning objectives and where they make a positive contribution to the character, function and appearance of the Conservation Area and its setting. The Council will consider the contribution of existing uses to the special interest of an area when assessing change of use applications, and will promote compatible uses which ensure future long-term viability.

The proposal is consistent with the policies and objectives outlined in the Dublin City Development Plan 2028-2028.

# **Planning Assessment**

This Part 8 application is submitted by the Environment and Transportation Department Division for public realm improvement works in order to upgrade the existing tow path at Binn's Bridge as part of the overall Royal Canal Greenway project in accordance with the standards set out in the National Cycle Manual and Design Manual for Urban Roads and Streets. The development is in therefore accordance with the Z9 zoning objective which is 'To preserve, provide and improve recreational amenity and open space and green networks'.

The works are part of the Royal Canal Greenway Scheme whose core objective is to provide a high quality cycle and pedestrian route to facilitate and encourage movement by active modes within Dublin City. This Part 8 proposal will further enhance the quality of the Scheme by improving localised gradients making it more accessible and user friendly while also providing public realm improvements, particularly in the context of Binn's Bridge which is a protected structure and the 2<sup>nd</sup> Lock Gate which is also of significant heritage value.

The Part 8 proposal acknowledges that there is a need to provide the highest quality cycle and pedestrian infrastructure in line with the National Cycle Manual and the Design Manual for Urban Roads and Streets. The design has been revised to ensure that gradients do not exceed the maximum of 5% at any point along the study area.

The design has been conscious of its location within the curtilage of Binn's Bridge, a protected structure. The extent of works has been expanded also to allow for the requirements of Waterways Ireland and this includes the full extent of the existing hardstanding surfaces, railings, fences and gates in this area and the area around 2<sup>nd</sup> Lock below Binn's Bridge.

The key aspects of the design are summarised as follows:

- The ramp gradient has been reduced to 4.99% along the entirety of its length
- In order to protect the integrity and function of the basement level vents fronting on the tow path and the amenity and security of the ground floor apartments in these adjacent blocks, the greenway has been offset from the existing boundary by approximately 1.3m-1.5m. This offset starts in advance of the western corner of the first apartment block and continues for approximately 50m until the proposed greenway level is sufficiently low so as to have no impact on the adjacent vents and structures.
- The greenway will operate as a 4.6m wide shared space for the majority of this area, tying back to the previously permitted cross sections at either end
- The 1.5m offset space will comprise a combination of a narrow maintenance path at existing ground level, approximately 0.5m-0.7m in width. The remainder of the space will form planted soft landscape strip to provide screening and additional security as indicated in the submitted sections.
- The works will involve the removal of all existing railings, fences and gates in this area and the replacement of same with railings more in keeping with the heritage setting, opening up the views of Binn's Bridge from the greenway.
- The existing stair access to the lock beneath Binn's Bridge has been revised and opened up with additional stepped seating and soft landscaping provided to create and improved public realm area which invites people to enjoy the setting of the Bridge and adds additional amenity value to the area
- The area immediately surrounding the lock gate is to be resurfaced with in-ground lighting provided to further compliment the public realm improvements. Railings are proposed along the lock gate itself as a safety feature due to the increased accessibility and given the unique nature of the lock gate in a constrained location beneath the bridge with notably greater depth than typically experienced at other lock gates along the canal. Gaps/gates are to be provided in the proposed railing to facilitate access to and from the lock when in operation and in emergency situations;
- The ramp will be constructed using sheet piling and appropriate stone cladding. The existing tow path wall will be removed and the stone assessed for re-use in the proposed cladding works. The area behind the sheet pile will be backfilled with suitable material to facilitate the increased width and ground level. Cladding works are expected to require de-watering of the canal to facilitate installation of masonry. No other works are proposed within the canal or below canal level. Sheet piling in the vicinity of the Lock Gate structure will seek to avoid impacting on same but may require temporarily taking down of some section of walls and reconstruction as detailed in the Architectural Heritage Impact Assessment (AHIA) submitted as part of this application and as discussed in the next section;
- Removal of the existing jetty due to its current poor condition and replacement with a new jetty in a new position slightly east of the current location. The design of the new jetty is to match the existing as per Waterways Ireland standard specification including all associated materials;
- Minor additional features including removal of a portion of the wall adjacent Binns Bridge, but which does not form part of the protected structure, to provide a public bench, removal of the existing kissing gates and barriers, provision of public lighting, CCTV services, relocation of existing services as required etc. It is stressed that the

proposed works do not Impact the existing underground gas installation in this area. Indeed, the removal of the existing kissing gates will improve access to same.

## <u>Drainage</u>

In terms of drainage, the proposed drainage strategy is in line with that proposed for the overall Royal Canal Greenway Phase 3. For the proposed shared space, the crossfall will be directed towards the carial edge. Where segregated, the footpath section will again crossfall to the canal edge. However, the cycle lanes are required to be at a lower level than the footpath. As a result, collection via a traditional Sully and pipe system is not possible given the level of the greenway relative to the public drainage infrastructure, which is at a much higher level in Dorset Street. Furthermore, Waterways Ireland have confirmed that point discharges into the canal are not permitted to maintain the integrity of the canal bed. On that basis, a permeable surface and build-up drainage solution is proposed which is also noted to be a positive Sustainable Drainage System (SOS) measure

## **Public Lighting and CCTV**

In terms of public lighting and CCTV, these are proposed in accordance with the design for the overall Royal Canal Greenway Phase 3 and with only minor alterations to relocate infrastructure based on the sight amendments to the layout, particularly where the greenway is offset from the adjacent structures.

In the area below Binns Bridge in the control of Waterways Ireland. in-ground lighting is proposed to provide adequate visibility and improved amenity given the increased accessibility. The detailed design of the lighting will be subject to agreement with DCC but will give appropriate consideration to offset any potential for vandalism and account for any maintenance requirements.

# Integration with Projects, Design and Construction

The report prepared by the Transportation Planning Division includes the following assessment: -

This report has been prepared in response to an amendment to the Part 8 permission in place for the Royal Canal Greenway Phase 3 (Planning register reference 2870/15). Under the permitted Reg. Ref. 2870/15, the route is permitted as a segregated pedestrian / cycle track. The permitted dimensions are noted, in particular below standard pedestrian path. The overall premise of delivering a safe 5% gradient is noted.

#### Integration with Projects

As noted above, there is an interaction between the application and BusConnects Swords to City Centre in respect of the proposed aligned toucan crossing. Having regard to the mutually complementary projects funded by the NTA, a condition should be attached to clarify the location of the proposed crossing.

### Gradient

In accordance with the National Cycle Manual, 2013, ensuring gradients are not excessive ensures such cycling facilities are usable. The maximum gradient for a ramp along a vertical

transition is 5% (refer to Section 4.10.4 –Combination Transitions). In terms of DMURS 2013, as amended, the maximum gradient is also noted as 5% (1:20 or less) which corresponds with Part M of the Building Regulations (refer to Section 4.4.6) for pedestrians. The proposed gradient as outlined under drawing no. D542-SK100-P04, titled "Plan and Profile – Binns Bridge" is consistent with the standards.

## Construction Management

The submitted EIA Screening Assessment refers to the implementation of all mitigation measures detailed in the Construction Environmental Management Plan. This consistent with the parent permission.

The comments and recommended conditions from the Transportation Planning Division are noted by the planning authority.

## **Conservation**

The report received from the Conservation Section includes the following assessment:

## Significance

As described in the Dublin City Industrial Heritage Record (DCIHR), 'The Royal Canal was part of the dawning of a new era in transportation in Ireland in the latter half of the eighteenth century. It commenced construction in 1790, in competition to the Grand Canal which commenced construction in 1789, and reached the river Shannon at Tarmonbarry in 1817. The construction of the canals constitutes one of the major civil engineering achievements of the eighteenth century facilitating transport links between Dublin and the interior of the country'.

The construction of the Royal Canal commenced in 1790 at the junction of the spur to Broadstone, to the east of Westmoreland Bridge and the 5th Lock, where Phase 4 of the Greenway commences. The canal then proceeded eastwards to the Liffey and westwards towards Ashtown.

The CO agrees that 'The Royal Canal constitutes one of the major civic engineering achievements of the eighteenth century', as noted in the Architectural Heritage Impact Assessment (AHIA) submitted.

As noted in the CO report on the original application Ref. No. 2870/15,

'The Royal Canal could be described as lying within the curtilage of adjacent protected structures. The physical and visual links with the adjacent railway network are also important. The canal defines the character of the commercial, industrial, residential and 'rural' areas through which it flows linking, in this instance, every period of Dublin's development. In some places it is need of care, in others it is well maintained but in general it is a well-used amenity, a place with an undeniable historic character that has managed to retain its unique thriving natural environment which is continually improving. The natural environment and built heritage within the canal corridor are intrinsically linked, both contributing to the character and significance of this conservation area'.

NIAH entry for Reg. No. 50060189 describes Binn's Bridge as a single elliptical arch with moulded granite voussoirs and vermiculated granite keystone and notes that 'The canal bridge is well executed with good quality masonry. Together with the adjacent canal lock and railway bridge it forms an important group of transport-related structures. The Royal Canal was developed in the latter part of the eighteenth century to provide freight and passenger transport

between Dublin and the River Shannon. This bridge was named for John Binns, one of the principal supporters of Royal Canal, and its construction is commemorated in a carved stone plaque on each face. In the mid-nineteenth century the canal was purchased by the Midland Great Western Railway company and a branch line to North Wall was constructed along this section of the canal in the 1860s'.

NIAH entry for Reg. No. 50060296 describes the 'Double-arch stone bridge, erected 1864, carrying road over railway line. Snecked limestone parapet wall with dressed granite copings and round arches with rusticated voussoirs....This railway bridge stands alongside an earlier canal bridge, neatly juxtaposing the eras of the canals and railways, the railway company having acquired the canal in the 1850s. The bridge is a good example of the high quality structures associated with the Midland Great Western Railway Company'.

NIAH entry for Reg. No. 50060188 describes the 'Double canal lock, constructed c.1795, having dressed limestone chamber walls with dressed limestone coping with recesses for lock gates..... This forms part of a group of three double canal locks (2nd Lock, 3rd Lock and 4th Lock) located between Binns Bridge at the southeast and Westmoreland Bridge at the northwest. Construction of the Royal Canal began in the late eighteenth century to provide freight and passenger transport between the Dublin and the River Shannon. The chambers exhibit good quality stone masonry with fine joints. The well-built double locks have attractive sloping edges to cope with the change in height between the lower, middle and upper levels. On either side of the lock, the canal expands in width to provide a mooring place for waiting boats. The 2nd Lock is complemented by the nearby Binns Bridge to the east'.

'Elegantly proportioned with a finely detailed and well-executed construction Binns Bridge is one of the earlier surviving canal bridges on the Royal Canal. The vermiculated key-stone, moulded archivolt and plaque exhibit a level of competency and skill associated with the late eighteenth and early nineteenth centuries.

This bridge is of particular note due to its incorporation of part of the second lock presenting the canal as a single co-ordinated achievement. Together with the rail/road bridge these structures form an important infrastructure-related group'. (DCIHR)

'These bridges and canal locks were an integral component of the canal system and railways, being fine examples of civil engineering prowess and feat of the times, an important reminder of Ireland's civil engineering history and heritage'. (AHIA)

#### Historic construction

The canal was lined with puddle clay to make it watertight. This was a light loam or clay mixed with water, the principal of which was to impregnate the earth or clay so that it could hold no more water. Puddle was prepared by finely chopping loam, preferably mixed with coarse sand or gravel as a deterrent to rats, with a spade and mixing it with water to a semi-plastic state. It was then applied in 9 " or 10 " layers. If the canal was dug out of permeable ground, both the sides and bed would have been lined with puddle.

Moving the bank of the canal outwards is a sizeable material alteration of a highly significant element of the city's industrial heritage, which was assigned a 'National' rating under the Dublin City Industrial Heritage Record (DCIHR Ref 18 02 001, 18 03 001, 18 07 019, 18 08 056).

While the edge of the canal along has been occasionally altered in the intervening years since its construction, this has generally been minimal in nature, and the width of the canal has not materially changed. The insertion of a new edge to sections of the canal is an irreversible intervention, which will have a serious impact the width and profile of the canal.

## Relevant Planning History

Previously approved Part 8 Planning Permission Ref. No. 2870/15.

### Description of the Works

In summary, it is proposed to amend the design of Phase 3 of the scheme which relates to a previously proposed ramp structure adjacent to Binns Bridge which will be modified to provide more appropriate gradients while allowing appropriate consideration of and integration with adjacent structures and properties accordingly, and also includes public realm and safety improvements to the area around the Royal Canal's 2nd Lock.

The constraints also include the location of an underground gas installation which lies between the tow path and the canal lock, a number of existing apartment blocks and associated basement structures bordering the tow path and a jetty along the tow path.

# Receiving environment

The subject site comprises a degraded and poorly presented arrangement with a utilitarian selection of guardings and anti-entry barriers, a 'kissing gate', a jetty, varied and poor-quality ground surfaces and access covers, and hostile graffiti on vertical historical surfaces of the bridge(s) and adjacent apartment blocks lower walls and other boundary walls. A large unsightly horizontal pipe extends across the eastern face of the older canal bridge. The former unbound ground surface has not been in place for a long time and has been replaced with hard concrete/asphalt/tarmac surfaces.

#### Assessment

I have reviewed the documentation submitted by the Design Team including Drawings, visualisations, OCSC Part 8 Report, AA Screening Report, EIA Screening Report, Architectural Heritage Impact Assessment (AHIA) and other documents.

The inclusion of professional services of a Grade 1 Conservation Architect in the Design Team designing the proposed works is welcome and important for this project in light of the significance of the Royal Canal.

In assessing the proposed amendments, the CO refers in particular to the policies and objectives in the Dublin City Council Development Plan 2022 - 2028 that are of relevance to the proposed works:

Policies BH\*A1 – Record of Protected Structures, BHA2 – Development of Protected Structures, BHA3 – Loss of Protected Structures, BHA4 – Ministerial Recommendations, BHA5 – Demolition of a Regional Rated Building on the NIAH (National Inventory of Architectural Heritage), BHA6 – Buildings on Historic Maps, BHA9 – Conservation Areas, BHA10 – Demolition in a Conservation Area, BHA12 – Industrial, Military and Maritime, Canalside and Rural Heritage, BHA16 – Industrial Heritage, GI\*\*8 – Metropolitan Greenways, GI11 – Proposed Natural Heritage Areas, GI18 – Minimise Impact – Light and Noise, GI20 – Views and Prospects, GI21 – Promote City landscape and

Objectives BHAO8 – Industrial Heritage and the RPS, BHA18 – Historic Ground Surfaces, Street Furniture and Public Realm.

- \* Built Heritage
- \*\*Green Infrastructure

It is acknowledged that only selected features of the Royal Canal are included in the current Record of Protected Structures, but its status as a Conservation Area, and its importance as one of the best examples of surviving, intact, early and innovative industrial and architectural heritage, and the inclusion of several of its features in the DCHIR is of great importance.

As previously stated, the CO supports the Royal Canal Greenway Scheme in principle, but has serious concerns about the impact and the irreversibility of the proposed works on the architectural character of the historic canal, albeit it is acknowledged that "the principle of narrowing of the canal width, reconstruction of side retaining wall and improvement works to the tow-path including new ramp transition has already been established in the approved Part 8 permission", as noted in the AHIA.

#### Selected comments on information received

It is understood by the CO that the proposed railing comprising vertical stainless steel plates with stainless steel wiring between the verticals was chosen to 'maintain openness along canal with visually permeable railings' – these are combined with a simpler tubular stainless steel guarding arrangement on the pontoon and beneath the bridge.

The 3no. Paul Hogarth visualisations are the same as were submitted at pre-app stage – the CO notes that the proposed finish to all guard railings is stainless steel, as indicated on Paul Hogarth Guardrails Drawing No. L703 Rev. P01 (however visualisations still indicate a mix of timber, powder-coated steel etc.) Visualisations shall be updated.

Paul Hogarth General Arrangement Drwg. No. L100 Rev.P06 (key aspects the same as preapp stage). The CO recommends that the Design Team submit detailed drawings of the proposed access gate set within new guarding beneath the bridge as concern is raised as to its suitability; the proposed access gate to vents and planting located adjacent to the maintenance pathway serving the existing Apartment Building on the southern boundary; the proposed access gate set within guarding to pontoon shall be submitted for the written agreement of the Planning Authority in advance of the works commencing

Paul Hogarth Site elevations – existing and proposed Drwg. No. L701 Rev. P03 (key aspects the same as pre-app stage).

Paul Hogarth Site Sections – Existing and Proposed Drwg. No. L702 Rev. P05. I have noted a number of changes on the drawing submitted including:

- A new interim level of 6.00 is indicated at the guardrail position on Section AA Existing (01) noted.
- Section AA Proposed (04) the large horizontal concrete beam / pilecap in the middle of the new stone clad wall is indicated with a thin stone cladding in front of the beam. The CO recommends that it would be preferable that the thickness of the stone cladding remains consistent along the height of the wall, with the horizontal beam pushed back accordingly to facilitate an authentic coursing arrangement. Concern is raised that the stone slip could break off, rending the concrete beam exposed. Similarly, it would be preferable that the lower horizontal beam (which is indicated at
  - the same level as the water level, but projecting beyond the face of the new stone cladding) is positioned sufficiently below the lowest anticipated water level, so that it is always concealed by the water and not visible at low water level as an interruption in the stone cladding.

The outwardly-curving vertical stainless steel plates to the proposed guardrail are indicated extending into the proposed hedge/planter along the perimeter of the ventilation zone serving the existing Apartment Buildings to the south of the cycle path.

It is difficult to assess whether the stainless steel horizontal wires and uprights will impede the growth of the proposed hedge, and how the guardrail will be maintained. Similarly, as drawn, the outwardly curving vertical plates will project into and above the pontoon structure. The CO recommends that the Design Team clarifies these items in advance of construction.

 Section BB-Proposed (05) indicates an exposed concrete beam beneath the Projecting canal pontoon which would visually interrupt the stone cladding to the new canal wall.

The CO recommends that as per the detail for Section AA Proposed (04), that if possible the stone cladding to the new retaining wall would continue up to the underside of the pontoon to avoid an exposed concrete beam within the stone cladding, notwithstanding the concrete beam would be somewhat concealed in shadow beneath the projecting pontoon.

The CO recommends that an elevation drawing of the proposed stone cladding to the new wall, including a dashed line to indicate the location of the intermediate / middle concrete beam and the proposed coursing (and preferably concealed concrete beams) is submitted for the written agreement of the Planning Authority in advance of the works commencing.

It would be preferable that the lower horizontal beam (which is indicated as projecting beyond the face of the new stone cladding, albeit below the water level) is positioned sufficiently below the lowest anticipated water level (as is indicated), so that it is not visible as an interruption in the stone cladding.

The Design Team is requested to submit a detailed drawing that indicates the proposed structural fixing detail between the pontoon and the new stone-clad retaining wall.

 Section CC – Proposed (06) The CO requests that the Design Team submits a detailed drawing for the fixing of the base of the proposed guardrail beneath the bridge, that will avoid any interference with the retained historic stone coping at the top of the wall.

NB. These comments pertain also to OCSC Structural Drawing D542-SK110 Rev.P08 Cross Sections D-D, A-A and B-B

- Paul Hogarth Guardrails Drwg. No. L703 Rev. P01 Handrail Type D: Jetty (04) It is understood that there will be steel wires running between the vertical members on the upper guardrail – the Design Team is requested to clarify this point. In addition, the Design Team shall submit a detail for the connection between the top rail of the pontoon guarding and the kick rail on the upper guardrail, and clarify the fixing detail (if one is required) between the lower rail on the pontoon guardrail and the stone cladding to the new retaining wall.

The proposed new edge and widening of the cycle/pedestrian path is indicated as a dashed light blue line on Paul Hogarth General Arrangement Drwg. No. L100 Rev.P06 and is illustrated in the existing and proposed sections on Paul Hogarth Drwg. No.

L702 Rev. P05. The increase in width of the path and decrease in the width of the canal ranges between c.3m and .9m.

The more significant direct and visual impact will occur due to the increase in height of the wall at the edge of the canal path to provide an improved gradient for universal access.

## Impact of the stone clad ramp in elevation

The submitted Paul Hogarth elevations (Drwg: No.L701 Rev P04) shows the impact of the proposal in elevation. The CO raises serious concerns in terms of the impact of the proposal on the special architectural character of the Conservation Area. The height of the sheer wall of the proposed new ramp extends over 3m in places and the extant soft character of the banks of the Royal Canal is lost in its entirety. The CO requests that provision to soften the impact of the stone clad sheer wall is considered through a new / augmented high quality high quality planting scheme appropriate for the banks of a canal (such as the introduction / encouragement of tall reeds) along its length.

#### AHIA Rev. June 2023

The methodology set out in the AHIA for the works to the historic fabric is acceptable in principle and confirms that the works will be monitored by a Conservation Architect.

The comments and recommended conditions from the Conservation Section are noted by the Planning Authority and attached.

## **Requirement for Appropriate Assessment**

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 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).

There are no Natura 2000 sites located either within or directly adjacent to the site. The Royal Canal has an indirect hydrological link via the River Liffey to Dublin Bay where several Natura 2000 sites are located. However, given the nature of the development, its scale, and the localised and temporary nature of the construction effects identified as potential sources, it is concluded that the proposed project is not foreseen to give rise to any significant adverse effects on any designated European sites, alone or in combination with other plans or projects.

In addition, no account was taken of any controls, conditions or mitigation measures intended to wholly or partly avoid or reduce impacts on any European Site.

This evaluation is made in view of the conservation objectives of the habitats or species for which these sites have been designated. Consequently, a Stage Two Appropriate Assessment is not required for the project.

#### **Environmental Impact Assessment**

The Applicant underwent an EIA Screening Exercise. Based on the size and nature of the proposed project, it is considered that the overall impact on the receiving environment will be low subject to implementation of all mitigation measures detailed in the Construction Environmental Management Plan. It was concluded that the nature of the proposed development is not considered to have likely significant effects on the environment (direct or indirect). It is considered therefore, given the nature and scale of the development that an EIA is not required in this instance

#### Conclusion

The works are part of the Royal Canal Greenway Scheme whose core objective is to provide a high quality cycle and pedestrian route to facilitate and encourage movement by active modes within Dublin City. This Part 8 proposal will further enhance the quality of the Scheme by improving localised gradients making it more accessible and user friendly while also providing public realm improvements, particularly in the context of Binn's Bridge which is a protected structure and the 2<sup>nd</sup> Lock Gate which is also of significant heritage value.

The works will provide a longer, primarily shared space ramp connecting the greenway to Dorset Street and it will improve the gradients on the scheme to below the maximum permitted 5% (1/20) as per the National Cycle Manual and DMURS. It will result in the narrowing of the canal channel however it will maintain the required 10m navigation width adjacent to the new structure and the following improvements including; sheet piling and stone cladding, improvements to the public realm area surrounding Binns Bridge and the 2 Lock and replacement of existing barriers, high fences and gates and provision of more appropriate finishes and edge treatments. There will also be the provision of additional soft landscaping features that will provide improved screening for adjacent properties. The removal of the existing jetty and its replacement with a new jetty in a new location will match the existing design which is considered acceptable.

Overall, the works will result in a significant improvement to the design for this area and improve the quality of the greenway as an amenity. The design has given significant consideration to the sensitive setting next to Binns Bridge and the 20 Lock to ensure they are not unduly impacted and to offer improvements to the environment where feasible.

It is considered that the proposed development in the form provided is acceptable and that the proposed development accords with the City Development Plan and the proper planning and sustainable development of the area.

#### Recommendation:

Accordingly, it is recommended that a decision be made by Elected Members of the Council to proceed with the proposed development, subject to the following recommendations;

- 1. The development shall comply with the following requirements of the Department of Housing, Local Government and Heritage
  - a) Prior to the commencement works at Binns Bridge the design of the proposed ramp from the Royal Canal tow path up onto Dorset Street Lower shall be reviewed to ensure that it does not impede the movement of otters across Lower Dorset Street from tow path to tow path on the southern side of Binns Bridge
  - b) That a Binns Bridge Otter Conservation Plan be agreed with the Dublin City Council Biodiversity Officer, this plan to include, if feasible, the installation of an otter bypass around the Royal Canal 2nd Lock under Binns Bridge at its northern end, and the construction of one or more otter holts on the Royal Canal 2nd Level below Binns Bridge and possibly also a holt on the 3rd or 4th Canal Level above Binns Bridge.

Reason: To provide for the free movement of otter, a species subject to a system of strict protection under Habitats Directive (92/43/EEC), along the Royal Canal, and provide secure resting places for this species on the canal in the Drumcondra area.

- 2. The development shall comply with the following requirements of the Transportation Planning Division:
  - a) The applicant shall liaise with the National Transport Authority in relation to any interaction with the Bus Connects proposals along Dorset Street Lower.
  - b) The proposed development shall otherwise comply with the condition of permission granted under Register Reference Terms & Conditions of the parent permission Reg. Ref. 2870/15.

Reason: To ensure a satisfactory standard of development.

- 3. The following requirements of the Planning Authority's Conservation Section shall be fully complied with in the proposed development:
- a) The Design Team is requested to submit the following details for the written approval of the Planning Authority when investigative works are complete:
- (i) Confirmation of the extent of historic 'wing wall' to be taken down and reconstructed recorded on 1:50 plan, elevation, section drawings
- (ii) Photographic record and schedule of all stones to be taken down, stored and reinstated / reused
- (iii) Elevation drawing of the proposed coursing of the stone cladding to the new retaining wall, including a dashed line to indicate the location of the intermediate / middle concrete beam behind
- (iv) Confirmation of the proposed mortar mix for repointing works, based on laboratory analysis
- (v) Samples of proposed cleaning methods (low pressure water / steam clean) including graffiti removal
- (vi) Samples of proposed raking out/repointing
- (vii) Drawing of historic stonework to bridge and canal structures indicating all proposed conservation repairs and consolidation, accompanied by cross-referenced photographs
- (viii) Detailed drawings of the proposed access gate set within new guarding beneath the bridge; the proposed access gate to vents and planting located adjacent to the maintenance pathway serving the existing Apartment Building on the southern boundary; the proposed access gate set within guarding to pontoon
- (ix) Detailed drawing that indicates the proposed structural fixing detail between the pontoon and the new stone-clad retaining wall.
- (x) Detailed drawing for the fixing of the base of the proposed guardrail beneath the bridge, that will avoid any interference with the retained historic stone coping at the top of the wall. [Ref. Section CC Proposed (06)]
- (xi) Detail drawing for the connection between the top rail of the pontoon guarding and the kick rail on the upper guardrail, and clarify the fixing detail (if one is required) between the lower rail on the pontoon guardrail and the stone cladding to the new retaining wall
- b) The Applicant is requested to address the following for written agreement:
- (i) It would be preferable that the thickness of the stone cladding in front of the large horizontal concrete beam / pilecap in the middle of the new stone clad wall remains consistent along the height of the wall, with the horizontal beam pushed back accordingly to facilitate an authentic coursing arrangement. [Ref. Paul Hogarth Section AA Proposed (04) New retaining wall]
- (ii) It would be preferable that the lower horizontal beam (which is indicated at the same level as the water level, but projecting beyond the face of the new stone cladding) is positioned sufficiently below the lowest anticipated water level, so that

- it is always concealed by the water and not visible at low water level as an interruption in the stone cladding. [Ref. Paul Hogarth Section AA Proposed (04) New retaining wall]
- (iii) The Design Team is requested to clarify whether the stainless steel horizontal wires and uprights will impede the growth of the proposed hedge along the southern boundary, and how the guardrail will be maintained, and provide a detail of the junction between the outwardly curving guardrail and the pontoon
- (iv) The stone cladding to the new retaining wall will if possible continue up to the underside of the pontoon to avoid an exposed concrete beam within the stone cladding [Ref.Section BB-Proposed (05)]
- (v) The lower horizontal beam (which is indicated as projecting beyond the face of the new stone cladding, albeit below the water level) is positioned sufficiently below the lowest anticipated water level (as is indicated), so that it is not visible as an interruption in the stone cladding. [Ref.Section BB-Proposed (05)]
- (vi) Salvaged stones from selected wall sections to be removed shall be cleaned and set aside for reuse in repairs and / or consolidation
- (vii) The CO shall be informed of any previously unknown features uncovered in the proposed works, and a site visit shall be facilitated at an appropriate time to inspect the works
- (viii) New Irish granite steps shall be formed of solid granite steps rather than 'thin' stone cladding
- (ix) All lamp standards, signage and any items shall be carefully considered and kept to a minimum to avoid visual clutter
- (x) The CO requests that provision to soften the impact of the stone clad sheer wall is introduced through a new / augmented high quality planting scheme appropriate for the banks of a canal / (such as the introduction / encouragement of tall reeds) along its length.
- (xi) A Grade 1 Conservation Architect or equivalent Conservation Professional with proven and appropriate expertise shall be employed to design, manage, monitor and implement the works and to ensure adequate protection of the retained and historic fabric during the works. In this regard, all permitted works shall be designed to cause minimum interference to the retained fabric and the curtilage of the Protected Structure.
- c) The proposed development shall be carried out in accordance with the following:
- (i) All works to the structure shall be carried out in accordance with best conservation practice and the Architectural Heritage Protection Guidelines for Planning Authorities (2011) and Advice Series issued by the Department of Housing, Local Government and Heritage. Any repair works shall retain the maximum amount of surviving historic fabric in situ. Items to be removed for repair off-site shall be recorded prior to removal, catalogued and numbered to allow for authentic re-instatement.
- (ii) All existing original features, in the vicinity of the works shall be protected during the course of the refurbishment works.
- (iii) All repair of original fabric shall be scheduled and carried out by appropriately experienced conservators of historic fabric.
- (iv) The architectural detailing and materials in the new work shall be executed to the highest standards so as to complement the setting of the protected structure and the historic area.

Reason: In order to protect the amenity, setting and curtilage of the Protected Structure at Binn's Bridge and the significance, character and amenity of the Royal Canal, and to ensure that the proposed works are carried out in accordance with best conservation practice.

The Area Committee as appropriate were informed of the initiation of the Part 8 planning process for the proposed development and the recommendation of the Planning Department at its meeting on the 9<sup>th</sup> May 2023 and on 13<sup>th</sup> October 2023 respectively.

The project is being funded by the National Transport Authority NTA. It is proposed to go to Construction Q1 2024.

Accordingly, it is recommended that a decision be made by Elected Members of the Council to proceed with the proposed development.

This report is submitted to the City Council pursuant to Section 179 of the Planning and Development Act, 2000 (as amended).

#### Resolution:

That Dublin City Council notes the contents of Report No. 234/2023 and hereby approves the contents therein.

Richard Shakespeare **Chief Executive** 

Date: 24th October 2023

# Appendix A

# **Consultees and Third Party Submissions/Observations**

# Consultees

Irish Water, Colvill House, 24 - 26, Talbot Street, Dublin 1

National Transport Authority (NTA), Head of Planning and Data Analysis, Harcourt Lane, Dublin, D02 WT20

Irish Rail, Pearse Street Station, Westland Row, Dublin 2

Transport Infrastructure Ireland (TII), Parkgate Business Centre, Parkgate Street, Dublin 8, DO8YFF1

The Heritage Council, Church Lane, Kilkenny City, Co. Kilkenny

An Taisce, Tailors Hall, Back Lane, Dublin 8

Department of Housing, Local Government and Heritage, Government Offices, Newtown Road, Wexford, Co. Wexford, Y35 AP90

# **Third Parties**

- 1 Austin Bayley
- 2 Christopher Maher
- 3 Ciaran Murphy
- 4 Conor Hogan
- 5 Dan Barry
- 6 Des Gunning
- 7 Eoin O'Mahony
- 8 Leo McNamee o.b.o. Iona District Resident's Association
- 9 Liam Egan
- 10 Murray Rees o.b.o. The Mountjoy Square Society
- 11 Paul Kelly
- 12 Stephen Hall



