

An Bord Pleanála
64 Marlborough Street
Dublin 1

OUR REF: 3rd /O/124

11 March 2014

Re: An Bord Pleanála Reference PA0033; Applicant; Galway Harbour Company – Galway Harbour Extension – Direct Application to An Bord Pleanála in respect of a Strategic Infrastructure Development

Dear Sir/Madam,

I refer to the above application and I wish to advise that on behalf of the Board of Iarnród Éireann, a Prescribed Body under the Planning & Development Regulations 2006, Article 28.(1).(j & w), we would like to make the following observations:

1) General:

- a) The Railway Safety Act 2005 places an obligation on all persons carrying out any works on or near the railway to ensure that there is no increase in risk to the railway as a consequence of these works. All work carried out adjacent to, or under or over the railway, or that may have a direct or indirect impact on the railway must be carried out in a safe manner which safeguards the interests of Iarnród Éireann (IÉ). This includes minimising the risk to the railway and minimising the general impact on the railway. Due to the interface of the proposed works to the railway, Galway Harbour Company must take into account this obligation in the design, construction and operation of the scheme.
- b) Iarnród Éireann is obliged to comply with the requirements of the Railway Safety Act (2005), the Railway Safety Directive (2004/49/EC) and the Interoperability Directive (2008/57/EC) for all new railway infrastructure. In order to satisfy these legislative requirements an application for Authorisation to Place in Service (APIS) shall be made to the Railway Safety Commission (RSC) for each stage of the project in accordance with the RSC Guidelines for the approval of new infrastructure works, in particular RSC-G-009 'Guidelines for the Process of Authorisation for Placing in Service of Railway Sub Systems'.
- c) Iarnród Éireann is also obliged to comply with the requirements of Commission Regulation (EC) No. 352/2009, 'Common Safety Method on Risk Evaluation and Assessment' for all new railway infrastructure. In order to satisfy the requirements of the Common Safety Method, Iarnród Éireann has developed a standard, IM-SMS-014 Safety Validation of Changes to Plant, Equipment, Infrastructure and Operations (PEIO). An application for safety validation shall be prepared by Iarnród Éireann for each stage of the project, to be submitted to the Safety Validation Panel (SVP), SVP approval will be required before an application can be made to the Railway Safety Commission.

2) Proposed Rail Freight Link:

- a) Iarnród Éireann have no objection to the inclusion of the proposed rail freight link on the proposed harbour extension lands for planning purposes but the feasibility of the link being brought into operational use is dependent on the development of the design to demonstrate its commercial viability and mitigation of all associated risks to railway safety, operations and infrastructure.

- b) A number of assumptions have been made in the EIS (Chapter 13.3 – Rail) in relation to the current and future line capacity of the rail infrastructure between Galway and Athenry, and the potential to accommodate new freight services from the proposed harbour extension. A detailed study of the current and future rail infrastructure capacity by Iarnród Éireann would be required to verify the assumptions made in the EIS and to determine the actual capacity of the rail infrastructure to accommodate new freight services.
- c) It is noted that while the proposed rail infrastructure within the Galway Harbour Extension will be constructed during Stages 2 and 3 of the development, the connection to the Galway to Athenry rail line will not be made until there is a commercially viable service.

3) Proposed Lowering of Lough Atalia Road at the Existing Railway Underbridge (UBG171):

- a) Iarnród Éireann are supportive of the proposal to increase the headroom at the Lough Atalia Road Bridge (UBG171), but given the extent and intrusive nature of the proposed works it is recommended that an effective clearance of 5.3m is provided for normal heavy goods vehicle passage below the existing soffit.
- b) The proposal includes significant works on Córas Iompair Éireann (CIÉ) lands beneath the Lough Atalia Road Bridge (UBG171) and a licence agreement between CIÉ/IÉ and Galway City Council/Galway Harbour Company is required for the design, construction and maintenance of the proposed works. The safety and technical acceptance of the proposed works by IÉ is also required in accordance with Iarnród Éireann Infrastructure Standard I-DEP-0120, Guidance on Third Party Works.
- c) Drg. No. 2139-2169 Rev. A:
The construction of the drainage attenuation tank will require a deep excavation close to the south-west edge of the existing bridge abutment. These works will require that all temporary works used to construct this tank must fully support the loading from the existing abutment. Full structural monitoring of the existing abutment and railway tracks will be required for these works in accordance with Iarnród Éireann Standards.
- d) Drg. No. 1254-2169 Rev. A:
Five manholes are to be constructed close to the centreline of the new carriageway. Insufficient engineering details are provided to show the means of water entering the attenuation tank from road level.
- e) Drg. No. 2139-2170 Rev. A:
The proposed South-West and North-East elevations indicate that concrete protection is provided to the base of the existing abutment, however, very little detail or sizes are provided for this concrete protection. The site investigations referenced in Appendix 6.2 of the EIS are inconclusive as the extents of the existing abutment foundations have not been determined. Trial pits 1 to 4 are at corners of the abutments however little is known about the extent of the foundations at the bottom of abutments along the road. In order to properly review the proposed works, it is recommended that additional site investigations are undertaken to determine the full extents of the existing abutment foundations.
- f) Provision should be made for maintaining the security of the railway boundary during the course of the works and the boundary treatment should be completed before any major development works begin on site.
- g) Should the development require the use of a crane that could swing over the railway property, then the developer must enter into an agreement with IÉ/CIÉ regarding this issue.
- h) Any proposed services that are required to cross along, over or under the railway property must be the subject of a wayleave agreement with CIÉ/IÉ.

4) Proposed new Railway Underbridge on Galway Harbour Enterprise Park Road:

- a) It is recommended that the detailed design of the proposed railway underbridge on the Galway Harbour Enterprise Park Road should be progressed as an integral structure.
- b) It is recommended that an effective clearance of 5.3m is provided for normal heavy goods vehicle passage below the proposed railway underbridge.

These observations are made in the interests of safety in operation of the railway and we recommend that the above points are addressed by An Bord Pleanála.

Yours faithfully,



James Kenny

Third Party Co-ordinator, New Works