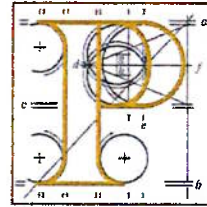


Our Case Number: ABP-317679-23



**An
Bord
Pleanála**

Transport Infrastructure Ireland
Parkgate Business Centre
Parkgate Street
Dublin 8
D08 DK10

Date: 03 October 2023

Re: Ringsend to City Centre Core Bus Corridor Scheme.
Ringsend to City Centre, Co. Dublin.

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter.

Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

The Board has also received an application for confirmation of a compulsory purchase order which relates to this proposed road development. The Board has absolute discretion to hold an oral hearing in respect of any application before it, in accordance with section 218 of the Planning and Development Act 2000, as amended. Accordingly, the Board will inform you in due course on this matter. The Board shall also make a decision on both applications at the same time.

If you have any queries in relation to this matter please contact the undersigned officer of the Board at laps@pleanala.ie

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

HA03A

Teil	Tel	(01) 858 8100
Glaos Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Niamh Thornton

From: LAPS
Sent: Friday 29 September 2023 10:36
To: Niamh Thornton
Subject: FW: TII submission ABP Ref. HA29N.317679_ Ringsend to City Centre Bus Corridor Scheme_NTA, TII ref. TII23-124008
Attachments: TII23-124008 Ringsend BusConnects_ABP ref. HA29N.317679_submisison issued 28.09.2023.pdf
Categories: TO PRINT

From: SIDS <sids@pleanala.ie>
Sent: Thursday, September 28, 2023 1:47 PM
To: LAPS <laps@pleanala.ie>
Subject: FW: TII submission ABP Ref. HA29N.317679_ Ringsend to City Centre Bus Corridor Scheme_NTA, TII ref. TII23-124008

From: Landuse Planning <LandUsePlanning@tii.ie>
Sent: Thursday, September 28, 2023 1:39 PM
To: SIDS <sids@pleanala.ie>
Cc: Landuse Planning <LandUsePlanning@tii.ie>
Subject: FW: TII submission ABP Ref. HA29N.317679_ Ringsend to City Centre Bus Corridor Scheme_NTA, TII ref. TII23-124008

Dear Sir/Madam,

Please find attached a copy of TII's observation on the above application.

Please acknowledge receipt of this submission.

Acknowledgements can be forwarded to landuseplanning@tii.ie.

Regards,

Cliona Ryan
Land Use Planner
Transport Infrastructure Ireland
Phone: +353 (0)1 646 0000
Land Use Planning Email: landuseplanning@tii.ie
Address: [Parkgate Business Centre, Parkgate Place, Parkgate Street, Dublin 8, Ireland, D08 DK10](#)



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do not expect a response or action outside of your own working hours unless it is clearly noted as requiring urgent attention.

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An Bord Pleanála
(Strategic Infrastructure Division)
64 Marlborough Street
Dublin 1
D01V902

By email: sids@pleanala.ie

Dáta | Date 28 September 2023

Ár dTag | Our Ref. TII23-124008

Do dTag | Your Ref. HA29N.317679

Re: BusConnects Ringsend to City Centre Bus Corridor Scheme

Dear Sir/Madam,

Transport Infrastructure Ireland (TII) acknowledges receipt of referral of the BusConnects Ringsend to City Centre Bus Corridor Scheme application by National Transport Authority (NTA). TII wishes to acknowledge and support the BusConnects Project in playing a key part of the Government's policy to improve public transport and address climate change in Dublin and other cities across Ireland.

Project Ireland 2040, the National Planning Framework and National Development Plan, 2021 – 2030, outline the key sectoral priority of maintaining Ireland's existing national road network to a robust and safe standard for users. The significant investment required for Luas to 2040 as part of asset protection is further reflected the National Investment Framework for Transport in Ireland (NIFTI). Official planning policy for development at or near national roads is set out in the DoECLG *Spatial Planning and National Roads Guidelines for Planning Authorities (2012)*.

The requirement to protect the capacity, safety and efficiency of the existing national road network is further reflected in the *Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy, 2019-2031*, specifically at Section 5.6 Integrated Land Use and Transportation Guiding Principle; *"The strategic transport function of national roads and associated junctions should be maintained and protected."*

The NTA Greater Dublin Area Transport Strategy 2022-2042 at Measure ROAD2 sets out *National Roads Requirements* explicitly complementary to the Guidelines and includes provisions 1 and 9 as follows:-

"1. The primary function of national roads is to cater for strategic traffic and this function must be protected"

TII is also responsible for the safe and efficient operation of the existing light rail network, Luas. The Greater Dublin Area Transport Strategy 2022-2042 at Measure LRT11 – *Enhance Priority for Trams*, states:-

"The NTA, in conjunction with TII and the local authorities, will explore how best to manage the road and street network to:

- *ensure reliable and competitive journey times for Luas;*
- *maximise service efficiency; and*
- *enable capacity to expand in line with increase future demand."*

To assist the Board in ensuring sustainable compatibility between State transport assets, TII's submission seeks to address the safety, capacity and strategic function of the national road network and existing Luas in accordance with TII's statutory functions, and the provisions of official policy.

Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag www.tii.ie.
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A review of the proposed Ringsend to City Centre Bus Corridor Scheme application notes that the proposal will interact with the light rail network, tramstops and associated under and overground services at one location on Mayor Street Upper between the junctions of the National Convention Centre and Park Lane.

TII considers it is critical for the safe and efficient operation of the light rail network during and after the proposed works that any potential impacts of the proposed works and resulting scheme are adequately mitigated as part of the proposed scheme.

This submission identifies the interactions of the proposed BusConnects scheme with the light rail network, sets out potential impacts arising and identifies appropriate treatment/mitigations in order for the proposed BusConnects scheme to proceed complimentary to, and integrated with Luas. TII advises as follows:

Light Rail Interactions, Mitigations Requirements and Recommendations

TII is responsible for the safe and efficient operation and maintenance of the Luas service. Unlike buses, trams require fixed tracks, overhead lines, fixings and associated under and over ground services infrastructure, including trackbed and surfaces, which are complex and costly to alter. In addition, changes to this infrastructure and the implementation of amended street finishes and traffic management practices can create disruption to the Luas network service which should be avoided or ameliorated. These are important considerations that have implications for the practical implementation of this proposed scheme.

This submission is made having regard to:-

- TII's *Code of engineering practice for works on, near, or adjacent the Luas light rail system*, and
- *Light Rail Environment - Technical Guidelines for Development*, TII Publication no. PE-PDV-00001.

The Proposed Ringsend Bus Corridor Scheme interacts with Luas at a single location immediately north of the National Convention Centre on Mayor Street Upper along which Luas travels at grade and within 70 metres of Mayor Street junction with Park Lane and the Spencer Dock Luas Tramstop to the east. This location is isolated from the proposed continuous bus corridors. This interaction identified is set out below.

1.0 Summary of current and proposed traffic arrangements at Mayor Street Upper

The proposal interacts with Luas at the entrance / exit from the Convention Centre and underground car park onto Mayor Street Upper along which Luas runs and Luas signalisation is installed.

This section of Luas, part of the Luas Red Line Docklands Extension from Busáras to the Point, was completed in 2009. Currently, there exists a 'no right turn' sign at this exit. In addition, Mayor Street Upper does not allow eastbound traffic between this exit and Park Lane to the east. In this way, all vehicular traffic running eastbound from Guild Street along Mayor Street Upper is prevented from travelling past the Convention Centre onto the Junction of Park Lane and Mayor Street.

The current and established Convention Centre and underground car park access /exit onto Mayor Street Upper allows eastbound and westbound access but westbound exit only onto Mayor Street Upper onto the Mayor Street Bridge junction with Guild Street where traffic can travel north or south. Traffic traveling south along Guild Street may turn westbound onto the North Quays.

It is noted that the proposal excludes Luas from the boundaries of the Scheme works, however it appears that increased traffic movements across the Luas alignment will occur as part of the Scheme as a result of a new vehicular eastbound lane proposed to be installed on the northern side of Mayor Street Upper between the exit from the Convention Centre and Park Lane. This will allow left and right hand turning movements onto Park Lane from Mayor Street Upper in addition to the proposed right turning movements from the exit of the Convention Centre. These proposed alterations to the carriageway on Mayor Street Upper and revised traffic arrangements will interfere not only with the efficiency of

the Luas service due to a degraded signal priority in both directions but also the safety of Luas operations due to an increase in conflicting movements.

2.0 Interaction of Proposal with Light Rail at Mayor Street Upper

According to *Ringsend to City Centre Core Bus Corridor Scheme General Arrangement*, Sheet no. 03 of 12, Drawing no. BCIDD-ROT-GEO_GA-0016_XX_00-DR-CR-0003, REV M01 (insert) 'right turn movements at this location are to be allowed'.

TII advise that this alteration is not indicated on *Ringsend to City Centre Core Bus Corridor Scheme Traffic Signs And Road Markings*, Sheet no. 03 of 12, Drawing No. BCIDD-ROT-TSM_GA-0016_XX_00-DR-CR-0003, REV M01 (insert). The alteration appears to be depicted on *Ringsend to City Centre Core Bus Corridor Scheme Junction System Design Mayor Street Upper / Park Lane*, Sheet 20 of 20, Drawing No. CIDD-ROT-TSM_SJ-0016_XX_00-DR-TR-0020, REV M01.

The works proposed for this part of Mayor Street Upper are not physically connected to the Ringsend to City Centre Bus Corridors.

The submitted EIAI divides the proposed scheme into 3 sections. The junction alterations and works on Mayor Street Upper to connect to the Mayor Street Upper / Park Lane junction would appear to occur in *Section 1 Talbot Bridge to Tom Clarke East Link Bridge* as they lie directly north of this *Section 1*.

Chapter 2 of the submitted EIAI entitled *The Need for the Proposed Scheme* does not appear to set out the rationale for the proposed works at the Mayor Street Upper location though cites the Convention Centre specifically and Docklands generally as generating demand for an improved public transport service at subsection 2.2.

Chapter 3 *Consideration of Reasonable Alternatives* provides a rendition of the iterations of design of the proposed scheme. Similarly, the rationale for the alterations to Mayor Street Upper do not appear to be described separately with the closest part of the proposed scheme along North Wall Quay, part of *Section 1* of the scheme, is identified as having been preferred to be included in the scheme¹.

Design evolution identifies the preference for Option A² that includes continuous bus lanes along North Wall Quay. To facilitate the continuous bus lane along the North Quays, "the effect of right-turns along the north quays was considered further"³ with a determination made for "Option D - Retain right-turns, where required for essential access or public transport movements only (i.e. ... Park Lane)"⁴.

TII notes that the works proposed on Mayor Street Upper consisting of the creation of the proposed westbound carriageway between the Convention Centre and Park Lane, the right hand turning movement out of the Convention Centre and alterations to the Park Lane / Mayor Street junction appears to be cited only once at Chapter 4 *Proposed Scheme Description* of the submitted EIAI as follows at section 4.2 *Proposed Scheme overview*:

"The Proposed Scheme includes a local modification to Mayor Street at Spencer Dock. In order to accommodate proposed turning movement restrictions at the Guild Street / Samuel Beckett Bridge junction for the purposes of provided enhanced bus, cycle and pedestrian priority, it is proposed to open an eastbound traffic lane north of the LUAS between the National Convention Centre Car Park and Park Lane. This will facilitate traffic exiting the car park towards the M50 Port Tunnel."

No further individual description or record of the works at this location is at Chapter 4 of the submitted EIAI. This includes its omission from *Table 4.4: Junctions within Section 1 of the Proposed Scheme* that lists only the 3 arm signal junction at Park Lane / North Wall Quay in vicinity of the works proposed at Luas. Park Lane at its junction with North wall Quay is currently signalised and both the North Quays and Park Lane appears to be proposed to retain two-way travel for all vehicles alongside proposed dedicated continuous bus lanes either side of the North Quays.

¹ At 3.4 *Design Alternatives*, 3.4.1 *Development of the Draft Preferred Route Option* of the submitted EIAI

² At 3.4.1.1.1 *Section 1 Bus Priority Options – North Quays* of the submitted EIAI

³ At 3.4.1.1.3 *Section 1 – Access and Servicing Arrangements on the North Quays* of the submitted EIAI

⁴ *ibid.*

City Centre Core Bus Corridor Scheme General Arrangement, Sheet no. 01 of 12, Drawing no. BCIDD-ROT-GEO_GA-0016_XX_00-DR-CR-0003, REV M01, appears to indicate the retention of a left hand turning lane from Guild Street onto the North Quays that currently facilitates onward travel from the 'left only' exit at the Convention Centre along Mayor Street Upper, to Guild Street, onto the North Quays and onward to Dublin Port or the Dublin Tunnel. However, the extent of the proposed Scheme does not include the junction of Mayor Street Bridge and Guild Street where traffic exiting Mayor Street Upper from the Convention Centre may turn north or south.

Chapter 6 of the submitted EIA *Traffic and Transportation* describes the existing and anticipated proposed traffic profiles as result of the proposed scheme. The existence of Luas is not recorded nor therefore considered amongst the modes of transport in subsection 6.3.2 *Section 1 – Talbot Memorial Bridge to Tom Clarke East Link Bridge* where the baseline traffic environment is described from the perspective of pedestrian, cycling and bus infrastructure and general traffic and existing parking / loading. TII also would highlight to the Board that neither the existing national road nor light rail networks appear to be separately considered as discreet chapters or subsections of the submitted EIA, including at Chapter 19 *Material Assets*.

It is noted that the Euro Car Parks Convention Centre and Point Square are cited as ameliorating the loss of on street car parking as a result of the proposed scheme in Chapter 6 of the submitted EIA *Traffic and Transportation*. Specifically the Convention Centre Car Park is noted as amelioration for the proposed loss of 9 no. informal parking spaces adjacent to the eastbound lane of R801 North Wall Quay and 7 no. paid spaces east of the junction of the North Quays with Park Lane⁵.

As advised previously, the interaction with Luas created by the proposed alteration of vehicular traffic movements on Mayor Street Upper will interfere not only with the efficiency of the Luas service but also its safety.

3.0 Mitigation Requirements for Light Rail - Luas

The proposed Ringsend Bus Corridor Scheme includes works on Mayor Street Upper unconnected to the Ringsend Bus Corridor Routes focussed on the North and South Quays. A new eastbound carriageway running alongside Luas is proposed. In addition, it appears indicated that all traffic exiting the Convention Centre and underground car park onto Mayor Street Upper that is currently subject to a 'left only' turn allowing travel westbound onto the junction of Mayor Street Bridge and Guild Street where it may head north or south will be allowed to exit in both directions.

Having regard to the function of the Convention Centre car park as a public paid car park, identified in the submitted EIA as suitable to accommodate the loss of limited on street parking along the North Quays, in addition to its dedicated use car parking for events at the Convention Centre, the proposed new right turn crossing of the tramway eastbound onto Mayor Street Upper to Park Lane will have negative impact on the safe and efficient operation of Luas at this location and on Red Line Luas services.

From information submitted, TII are unable to ascertain the impact on Luas from the proposed works on Mayor Street Upper. For example, it is reiterated that the proposed works to Mayor Street Upper do not appear to form part of the rationale of the design rationale as set out in Chapter 3 of the submitted EIA.

Also from the information submitted, it appears that the rationale for the installation of a new eastbound traffic lane between the Convention Centre and Park Lane is to "... facilitate traffic exiting the car park towards the M50 Port Tunnel"⁶. TII notes that traffic currently access the Dublin Tunnel, by means of travelling (left) westbound along Mayor Street Upper, turn left at the junction of Mayor Street Bridge and Guild Street and left again at the junction of Guild Street onto the North Quays. This routing is established and is to remain unchanged in the proposal. It therefore appears that the element of the proposal is unwarranted and inappropriate.

⁵ At subsection 6.4.6.2.2.4 *Parking and Loading* of the submitted EIA

⁶ At Chapter 6 *Traffic and Transportation*, subsection 6.4.6.2.2.4 *Parking and Loading* of the submitted EIA

Uncontrolled crossings of the Luas tramway at grade pose a significant safety risk to Luas, its users and also road users. In addition there is potential to significantly negatively impact service efficiency and reliability especially when occurring in proximity to planned established stops at Park Lane / Mayor Street junction and the Spencer Dock Luas Tramstop.

Just as continuous bus lanes in both directions long the North Quays was a fundamental design principle in the proposed Scheme, the maintenance of the safe and efficient operation of the public infrastructure asset that is Luas relies on minimal unplanned stoppages between Tramstops.

In accordance with *The Measure LRT11 – Enhance Priority for Trams* of the Greater Dublin Area Transport Strategy 2022-2042, Luas should maintain priority over the private car along Mayor Street Upper especially in relation to a paid parking facility for private cars.

TII requests that the proposed works to Mayor Street Upper be excluded from the proposed Ringsend Bus Corridor Route which the Mayor Street Upper works are unconnected to.

4.0 Luas Light Rail Network Recommendation

The proposed scheme includes works proposed to be carried out on, and in close proximity to Luas infrastructure that may necessitate alteration and relocation of Luas infrastructure, which includes underground services that must be subject to the prior approval of TII. In addition, the proposed works to install an eastbound traffic lane between the Convention Centre and Park Lane along Mayor Street Upper, that holds Luas, is to facilitate left and right hand turning movements for private vehicles from the Convention Centre and underground car park onto Mayor Street Upper.

The established private vehicle movements exiting the Convention Centre and underground car park are 'left only' to avoid uncontrolled crossing by these vehicles of the Luas alignment. The proposal to allow right hand turning movements at this location will result in the crossing of the Luas alignment by private vehicles which will substantially negatively impact the safe operation of Luas at this location and impact the maintenance of the efficient operation of the service.

From information submitted, TII are unable to ascertain the impact on Luas from the proposed works on Mayor Street Upper that from a review of the submitted application appear to be proposed to "... facilitate traffic exiting the car park towards the M50 Port Tunnel"⁷. However there are existing routes, unaffected in the proposed Scheme, which will facilitate the use of private vehicles to the Dublin Tunnel. It would appear the requirements of private vehicles are to receive priority over Luas operations and safety. TII notes that in the submitted application, this car park is described as the Euro Car Parks Convention Centre identified as an alternative for a limited amount of on street car parking spaces to be repurposed for Bus Routes in the proposed scheme⁸.

TII are surprised that the impact on Luas does not appear to be separately described nor proposed for mitigation in the submitted application. This element of the proposal is contrary to the interests of the safe and efficient operation of Luas, its users and road safety as well as the coordinated implementation of public transport services.

The proposed works on Mayor Street Upper are physically disconnected from the remainder of the proposed Ringsend to City Centre Bus Corridor Scheme and therefore do not directly contribute to the creation of the proposed Bus Corridors. No connected alterations to traffic arrangements in the vicinity of the works appear to be proposed and therefore the existing eastbound and westbound access to the Convention Centre and underground car park at Mayor Street Upper remains unchanged in the proposed scheme as does the ability of all traffic exiting westbound to access the North Quays from the North wall Quay junction with Guild Street as is currently in place.

In the interests of the protection of the safety, capacity and efficiency of the light rail network, and coordinated maintenance and delivery of public transport services in accordance with *Measure LRT11 – Enhance Priority for Trams*

⁷ At Chapter 4 *Proposed Scheme Description*, 4.2 *Proposed Scheme overview* of the submitted EIA

⁸ At Chapter 6 *Traffic and Transportation*, subsection 6.4.6.2.2.4 *Parking and Loading* of the submitted EIA

of the Greater Dublin Area Transport Strategy 2022-2042, TII recommends the omission of proposed works on Mayor Street Upper from the Scheme. Their omission is the only appropriate method to mitigate the impact of these works.

Conclusion

The content of this submission and revisions requested by TII are submitted in the interests of protecting the capacity, safety and efficiency of national roads and Luas light rail transport networks. TII trusts that the foregoing comments will be of assistance to the Board in considering the BusConnects Ringsend to City Centre Bus Corridor Scheme.

TII would appreciate acknowledgment of receipt of this submission.

Yours faithfully,



Cliona Ryan
Land Use Planner